

2016 STATE OF GEORGIA ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE



**FINAL REPORT
MARCH 31, 2016**

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ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE**



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State of Georgia Department of Community Affairs

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SECTION I. INTRODUCTION AND EXECUTIVE SUMMARY

The objective of the 2016 Analysis of Impediments to Fair Housing Choice (AI) process was to research, analyze, and identify prospective impediments to fair housing choice throughout non-entitlement areas of the State. To ensure an accurate evaluation of current fair housing conditions, the AI includes a review of demographic and housing market data, relevant legislation, policies and practices affecting fair housing, public education and outreach efforts and direct community involvement through surveys, public forums, webinars and focus groups. The goal of the completed AI is to suggest actions that the State can consider when working toward eliminating or mitigating the identified impediments.

General

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 federal Fair Housing Act, 42 U.S.C. § 3608(e)(5), requires the Secretary of the United States Department of Housing and Urban Development (HUD) to administer its housing and urban development programs in a manner to *affirmatively further fair housing* (AFFH). All jurisdictions that are direct HUD-funded recipients of Community Development Program funds are required to conduct an assessment of its barriers to housing choice and develop a plan for overcoming the impediments identified. 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.

In regards to the housing and community development programs it administers, such as Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Solutions Grants (ESG), and Housing Opportunities for Persons with AIDS (HOPWA), HUD requires a single consolidated planning process and application cycle (Consolidated Plan)¹ for states and local jurisdictions that receive direct funding allocated from HUD (entitlement communities). These recipients are required to certify that they are affirmatively furthering fair housing. In the State of Georgia, the following entitlement cities and counties must certify that they are affirmatively furthering fair housing (AFFH):

Albany	Gainesville	Savannah	DeKalb County
Athens-Clarke County	Hinesville	Smyrna City	Fulton County
Atlanta	Macon	Valdosta	Gwinnett County
Augusta-Richmond County	Marietta	Warner Robins	Henry County
Brunswick	Rome	Cherokee County	
Columbus	Roswell	Clayton County	
Dalton	Sandy Springs City	Cobb County	

¹ The regulations governing the Consolidated Plan: 24 C.F.R. § 91.225(a)(1)

The Georgia Department of Community Affairs (DCA) certifies for the remainder of the state, herein referred to as “non-entitlement areas”.

Although the AFFH obligation of an entitlement or non-entitlement community arises in connection with the receipt of federal funding, its AFFH obligation is not restricted to the design and operation of HUD-funded programs at the state or local level. The AFFH obligation extends to all housing and housing-related activities in the jurisdictional area whether publicly or privately funded. As HUD noted in its recent AFFH rule², the Fair Housing Act not only prohibits discrimination but, in conjunction with other statutes, directs HUD’s program participants to take steps proactively to overcome historic patterns of segregation, promote fair housing choice, and foster inclusive communities for all.

Therefore, each jurisdiction must certify that it will affirmatively further fair housing (AFFH), which requires: 1) conducting an analysis to identify impediments to fair housing choice; 2) taking appropriate action to overcome the effects of any identified impediments; and, 3) maintaining AFFH records reflecting the analysis and the actions in this regard. The Analysis of Impediments to Fair Housing Choice (AI) is a HUD-mandated review of impediments to fair housing choice in the public and private sector. Its submission is a required component of any required Consolidated Plan as implemented every three to five years.³

The AI involves:

- A review of a jurisdiction’s laws, regulations, and administrative policies, procedures and practices;
- An assessment of how those laws, policies and practices affect the location availability and accessibility of housing;
- An assessment of conditions, both public and private, affecting fair housing choices for all protected classes; and,
- An assessment of the availability of affordable and accessible housing.

According to HUD, the purposes of the AI are to:

- serve as the substantive, logical basis for the Fair Housing Plan;
- provide essential and detailed information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates; and,
- assist in building public support for fair housing efforts both within an entitlement jurisdiction’s boundaries and beyond.

The HUD *Fair Housing Planning Guide* (March, 1996) states that impediments to fair housing choice are:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the

² 24 C.F.R. §§5, 91, 92, et. al. (2015)

³ See 24 C.F.R. §§ 91.235(c)(4)(PHAs/nonprofits), 91.255(a)(1)(local jurisdictions), 91.325(a)(1)(state jurisdictions), and 91.425(a)(1)(I)(consortiums). 124 C.F.R. §§ 1, 4, 6.4, 91.225, and 570.601. See also, U.S. Department of Housing and Urban Development, Office of Fair Housing and Equal Opportunity, *Fair Housing Planning Guide*, vol. 1, chapter 1, section 1.2, 1-3 (March 1996). 2 78 Fed. Reg. 43710 (July 19, 2013).

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

In addition, 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;
- 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.”⁴

In sum, an analysis of impediments to fair housing choice is more than a catalog of prohibitive policies or illegal acts. The analysis must identify those systemic and structural issues that limit the ability of people to take advantage of the full range of housing which should be available to them. In addition, it is essential to distinguish between fair housing and housing production. 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 challenge unless members of protected classes face this issue disproportionately. In fact, a large increase in affordable units in close proximity to one another can contribute to a challenge for fair housing choice in some cases, such as the concentration of racial or ethnic minorities.

WHO CONDUCTED THE AI

This report was prepared by Western Economics Services, LLC (WES) on behalf of the Georgia Department of Community Affairs (DCA). WES is an economic and community development consultant with over twenty years of experience in conducting analyses of impediments to fair housing choice for local jurisdictions, counties, multi-county regions, states, and insular areas throughout the country.

FUNDING

Funding for the AI was provided from a combination of HUD’s CDBG, HOME and Housing Choice Voucher funds for administrative activities.

⁴ *Fair Housing Planning Guide*, p.1-3.

GEOGRAPHIC SCOPE OF THE ANALYSIS

This AI addresses the status of fair housing within non-entitlement areas of the State of Georgia. Map I.1 on the following page displays the State of Georgia along with the areas encompassed by the state's 25 entitlement jurisdictions, which are white on this map.

RESEARCH METHODOLOGY

General Overview

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. This analysis involved both the collection and analysis of raw data that did not previously exist and the review of existing data and studies. The data were then evaluated using *quantitative analysis*, or the evaluation of objective, measurable, and numerical data, and *qualitative analysis*, or the evaluation and assessment of subjective data such as individuals' beliefs, feelings, attitudes, opinions, and experiences.

Quantitative Analysis

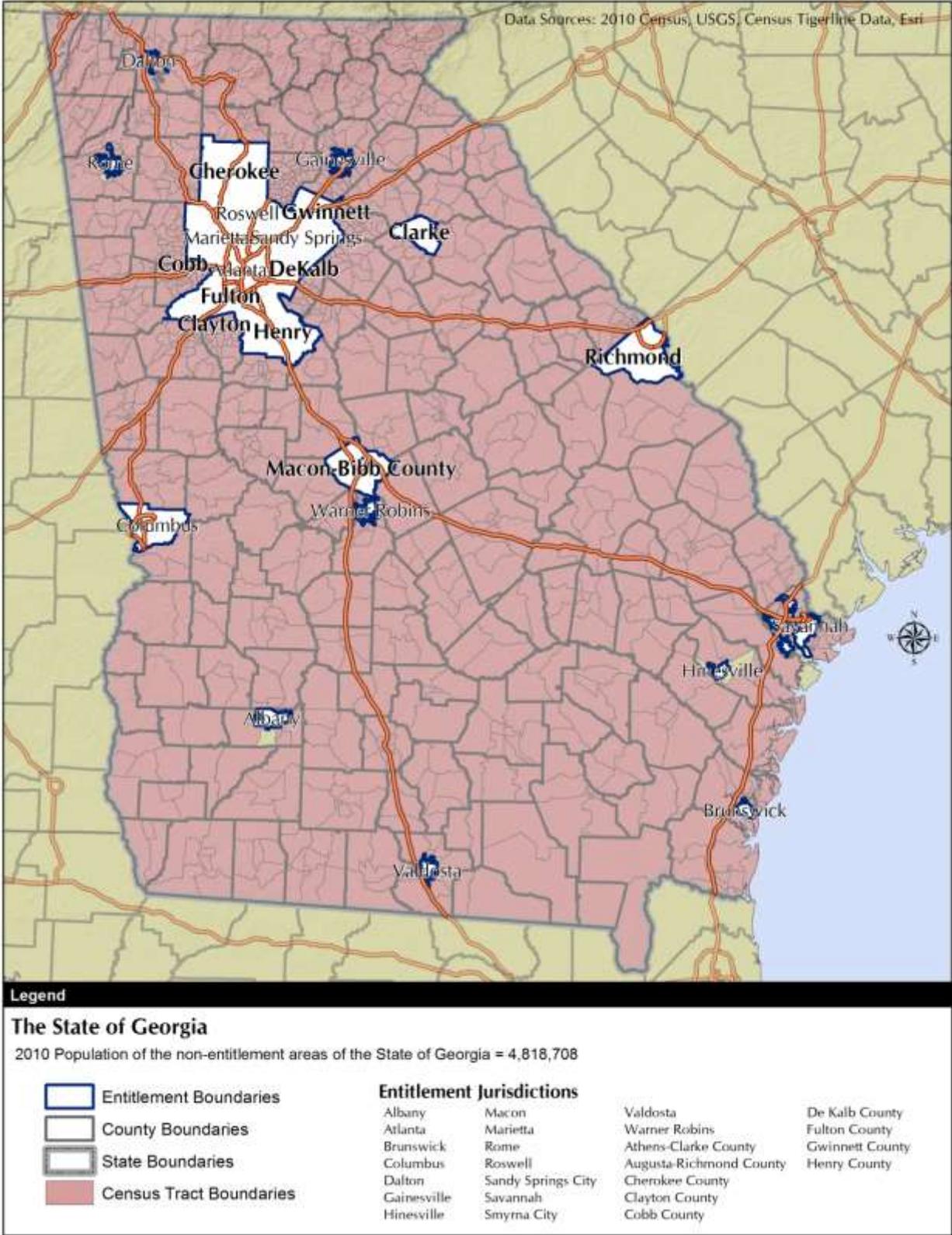
Quantitative sources used in analyzing fair housing choice in the State of Georgia included:

- 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.

Geographic analyses of racial and ethnic population distributions 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 State of Georgia. 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. Five-year ACS estimates from 2013 were also used for select maps.

Additional AI sources include the American Community Survey data averages from 2009 through 2013, 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. 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.

Map I.1
Georgia Study Area
Non-Entitlement Areas of Georgia
2010 Census Tigerline Data



Qualitative Analysis

Qualitative research included evaluation of relevant existing fair housing research and national and state 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 2015 State of Georgia Fair Housing Survey, regular meetings with members of the Grantee Outreach Committee and Public Housing Authority Outreach Committee, six fair housing focus groups, and six fair housing forums. In addition, this AI includes input from public housing authorities, recipients, city officials, residents, stakeholder groups, and key persons involved in the housing and community development industry, and particularly, fair housing. The surveys and various public involvement efforts, such as a series of four technology-based meetings (“webinars”) with the public housing authority outreach committee, three fair housing focus groups, six fair housing forums, and seven DCA-hosted fair housing outreach events, were conducted to gather information from consumers and various sectors of the housing industry about their experiences and perceptions of housing discrimination and their knowledge of fair housing laws and services.

The following narrative provides a brief description of key data sources employed for the 2016 AI for the State of Georgia:

Review of Fair Housing Laws, Studies, and Cases

Georgia residents are protected from discrimination in the housing market by laws at the federal and state level.⁵ These laws prohibit discrimination on the same bases identified in the federal law. Georgia’s housing discrimination law has been judged to be “substantially equivalent” to the federal FHA, which allows for HUD-subsidized, state-level enforcement of fair housing law through the Fair Housing Assistance Program (FHAP). The Georgia Commission on Equal Opportunity (GCEO) formerly served state residents in this capacity; however, the GCEO ceased to participate in the FHAP in 2012, though it is currently working to recertify as a FHAP agency.

Since the early 1970s the FHA has consistently been interpreted to apply to laws and policies that are apparently neutral with respect to protected class status, but which nevertheless “actually or predictably⁶” result in discrimination. In 2013, HUD finalized a rule formalizing its interpretation of discriminatory effects liability under the FHA. That interpretation was reaffirmed in a June 25, 2015 Supreme Court decision in *Texas Department of Housing and Community Affairs v. Inclusive Communities Project, Inc.* That case originated in a lawsuit against the Texas Department of Housing and Community Affairs (“the Department”) on the grounds that the process by which it awarded low income housing tax credits had the effect of concentrating affordable housing in areas with high concentrations of minority residents. In bringing the suit, the Inclusive Communities project relied in part on the disparate impact theory, and it was that theory that the Department sought to challenge in asking the Supreme

⁵ The State of Georgia has a fair housing law that parallels the federal Fair Housing Act at O.C.G.A. § 8-3-200 et seq. As a general rule, state and local governments may enact fair housing laws that extend protection to other groups as well. Georgia law extends fair housing protections to the same groups that are currently recognized under federal law. In addition, §8-3-220 Georgia’s state code prohibits “political subdivision[s] of the state” from adopting fair housing ordinances that extend protected class status to individuals who are not currently protected under the Georgia Fair Housing Law.

⁶ *United States v. City of Black Jack, Missouri*, 508 F.2d 1179, 1184 (8th Cir. 1974) It was racial discrimination, specifically, that was at issue in this case.

Court to hear the case. Ultimately, the Court held that individuals, businesses, and government agencies could be held liable for the disparate impacts of their policies.

Soon after the Supreme Court reached its decision, HUD announced a final rule significantly revamping its long-standing requirement to affirmatively further fair housing (AFFH). In developing and finalizing this rule, HUD has substantially revised the AFFH process by: (1) replacing the analysis of impediments with the assessment of fair housing (AFH), (2) integrating fair housing planning into the consolidated planning process, and (3) providing a fair housing assessment tool and nationally standardized datasets, among other changes. Generally speaking, the new rule will apply to local entitlement jurisdictions that are due to submit their next Consolidated Plan on or after January 1, 2017. For smaller entitlement jurisdictions, as well as states and insular areas, the new rule will apply to those set to submit their next Consolidated Plan on or after January 1, 2018. Until jurisdictions are required to submit an AFH, they are required to continue submitting analyses of impediments.

Under certain circumstances, the United States Department of Justice will file a fair housing complaint on behalf of residents who believe that they have suffered unlawful discrimination in the housing market. The Justice Department has filed ten such complaints against housing providers in the state over the last ten years, half of which alleged discrimination on the basis of race or color. Disability was the next most common complaint basis, cited in four complaints, and sex and familial status were each cited in a single complaint.

Georgia is the origin of the Supreme Court decision in *Olmstead v. LC*, which held that people with disabilities have the right to live in the least restrictive and most integrated settings. The *Olmstead* decision also mandates that states develop comprehensive plans to end unnecessary institutionalization of people with disabilities. Georgia was one of several states sued by the Department of Justice (DOJ) asserting an overreliance on segregated, institutional settings for persons living with disabilities. In 2010 DOJ entered into a Settlement Agreement with the Georgia Department of Behavioral Health and Developmental Disabilities (DBHDD). The Settlement Agreement requires the State to show the capacity to provide community-based long term care services and affordable housing to two discrete populations as follows:

1. Nine thousand (9000) individuals with severe and persistent mental illness, and/or co-occurring substance abuse disorders, who are currently served in state hospitals, frequently admitted into state hospitals, frequently seen in hospital emergency rooms, chronically homeless, at risk of being homeless and who are being released from jails or prisons; and
2. people with developmental disabilities transitioning from institutions or at risk of being institutionalized.

The Settlement Agreement also requires various strategies to develop normalized integrated community living options for individuals living with disabilities with access to voluntary supportive services. In addition to embracing its role in creating housing opportunities, Georgia seeks to support the broader goals of community integration expressed in the *Olmstead* decision. To that end, Georgia has been deliberate in developing new housing options for people disabilities in integrated settings.

Fair Housing Survey

HUD recommends that surveys be conducted during the AI process to gain input for the public regarding perceived impediments to fair housing choice in an area. As such, the State elected to utilize two survey instruments as a means to encourage public input in the AI process. The surveys targeted individuals involved in the housing arena and ordinary citizens. In addition to gathering data, these surveys were utilized to help promote public involvement throughout the AI process. The 2015 State of Georgia Fair Housing Survey, an internet-based instrument, received 739 responses; and the Citizens Survey received 247 responses.

The surveys were designed to address a wide variety of issues related to fair housing and affirmatively furthering fair housing. The following narrative summarizes key survey themes and data that were addressed in the survey instrument.

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 2013 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 State from 2004 through 2014. 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 535 fair housing complaints from within non-entitlement areas of the State allowed for inspection of the relative degree and frequency of certain types of fair housing complaints, and the degree to which such complaints were found to be with cause. 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. Additional complaint data were provided by the Georgia Commission on Equal Opportunity and the Savannah-Chatham Fair Housing Council.

Local and County Analyses of Impediments

The analysis presented in this document was supplemented by a review of five analyses of impediments to fair housing choice that have been submitted by local and county entitlement

jurisdictions in the state over the past five years.⁷ This review allowed for the identification of common trends and patterns in fair housing throughout the state, as well as to highlight differing approaches that those jurisdictions have taken to address the challenges identified.

The most common challenges included limitations on the supply and placement of affordable housing units, lack of sufficient fair housing education, and a lack of local fair housing enforcement and infrastructure. Other common impediments identified in at least two of the local and county AIs pertained to public transportation, restrictive zoning provisions, NIMBYism, home lending, and difficulties facing residents with disabilities. All of these issues identified at the local level reflect issues that are present in the state's non-entitlement areas.

Affirmatively Furthering Fair Housing in Georgia

Included in the current AI study was a summary of actions that the state has taken to address impediments to fair housing choice identified in the 2008 AI and subsequent planning documents. The State identified four impediments in total, relating to a general lack of knowledge of fair housing law and policy, limited supportive housing options for residents with disabilities, difficulties that individuals with limited English proficiency face in the housing market, and concentrations of racial and ethnic-minority households and households living in poverty. Though some of these challenges have proven persistent, the State has implemented a variety of policies and approaches to address the identified impediments, through public outreach and education, commitment of resources, and program design. These efforts are summarized in Section III of this report, and excerpts of planning documents detailing these efforts are included in Appendix O. The State will continue to build upon these efforts in addressing impediments identified in the current study, supplementing those efforts with actions outlined below under "Impediments to Fair Housing Choice and Suggested Actions."

Public Outreach

Efforts to secure public participation during the AI process included Fair Housing Forum and Public Outreach meetings in each of the state's 12 service delivery regions; two fair housing surveys, one targeting housing professionals, housing and community advocates, and other stakeholders and the other designed to assess the experience of residents in general; and an extended public review period that began in late December of 2015 and ran through February 28, 2016. Though HUD requires that the public be afforded at least thirty days to review AI documents, the State elected to provide an additional month to allow interested parties a chance to fully review the document and provide feedback and recommendations.

RESEARCH CONCLUSIONS

The final list of impediments to fair housing choice in the State of Georgia was drawn from all primary and secondary data sources using both quantitative and qualitative analysis, 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

⁷ Included in this review were AIs from the City of Atlanta (2013), the City of Warner Robins (2011), the City of Rome (2013), the City of Dalton (2014), and Gwinnett County (2015).

qualification as an impediment was derived from the frequency and severity of occurrences drawn from quantitative and qualitative data evaluation and findings.

IMPEDIMENTS TO FAIR HOUSING CHOICE AND SUGGESTED ACTIONS

Private Sector Impediments, Suggested Actions, and Measurable Objectives

Impediment 1: Discrimination based on race and disability in the rental markets. This impediment was identified through the review of fair housing complaints filed with HUD and the Georgia Commission on Equal Opportunity (GCEO), as well as through the review of the 2015 State of Georgia Fair Housing Survey.

Action 1.1: Conduct outreach and education concerning fair housing law and policy for landlords and property managers who are participating in DCA's Housing Programs throughout the state.

Measurable Objective 1.1: The number of outreach and education sessions conducted and the number of participants in those sessions.

Impediment 2: Failure to make reasonable accommodation or modification in the rental markets. This impediment was identified through the review of fair housing complaint data from HUD and the GCEO and responses to the 2015 Fair Housing Survey.

Action 2.1: Conduct outreach and education within DCA's housing programs concerning fair housing, Section 504 and ADA law for landlords and property managers throughout the state, focusing on the law's requirements as well as common misconceptions about those requirements.

Measurable Objective 2.1: The number of outreach and education sessions conducted and the number of participants in those sessions.

Impediment 3: Black and Hispanic home loan applicants are denied more frequently than white and non-Hispanic applicants. This impediment was identified through the review of data gathered under the Home Mortgage Disclosure Act ("HMDA data") and responses to the 2015 Fair Housing Survey.

Action 3.1: Conduct financial management outreach and education, through collaboration with housing counseling agencies, home buyer education entities and other partner organizations like the Georgia Student Finance Commission (GSFC) relating to credit and ways to build and maintain good credit.

Measurable Objective 3.1: The number of outreach and education sessions conducted and the number of participants.

Action 3.2: Create and implement a training for new lenders with the Georgia Dream program and existing lenders on DCA's lender advisory board related to the Supreme Court decision on disparate impact as it relates to race and ethnicity and the possible effect on lending laws and regulations. Also disseminate information via DCA's lender advisory newsletter.

Measurable Objective 3.2: The record of the training provided to new and existing lenders that partner with DCA on disparate impact and any assessments that

those lending institutions may offer to identify sources of discrepancies in loan denial rates.

Impediment 4: Female applicants have a higher denial rate than male applicants in rural Georgia home purchase markets. This impediment was also identified through the review of HMDA data.

Action 4.1: Conduct financial management outreach and education, through collaboration with housing counseling and home buyer education agencies as well as other partners like GSFC, relating to credit and ways to build and maintain good credit.

Measurable Objective 4.1: The number of outreach and education sessions conducted and the number of participants.

Action 4.2.: Provide training to new and existing lending partners with DCA on disparate impact related to differing lending rates by gender and share the results of the AI. Disseminate information at DCA's lender advisory board meeting and via the lender advisory newsletter.

Measurable Objective 4.2: The record of training provided to DCA's new and existing lending partners throughout the state on disparate impact of lending practices and differential loan rates and gender.

Impediment 5: Limited access to fair housing enforcement entities throughout rural areas of the state. This impediment was identified through the review of the state's fair housing enforcement entities, as well as in consultation with stakeholders who participated in public outreach sessions during the AI process, including the 2015 Fair Housing Focus Groups and Forums.

Action 5.1: Compile a statewide database of local private organizations that provide fair housing complaint referral or other fair housing services. Include information on these entities and fair housing laws and updates in DCA's current communications through newsletters to promote the dissemination of information concerning developments in fair housing policy and trends in fair housing enforcement and complaints.

Measurable Objective 5.1: Compilation of the database utilizing existing channels of communications concerning fair housing law. Note: The database will likely be compiled on an ongoing basis as more local providers are identified.

Impediment 6: Need for additional fair housing outreach and education. This impediment was identified in consultation with stakeholders who participated in the 2015 Fair Housing Focus Groups and Forum presentations, as well as through the review of responses to the 2015 Fair Housing Survey.

Action 6.1: Conduct outreach and education pertaining to fair housing, in partnership with local public housing agencies and non-profit and civic organizations, targeting housing providers and consumers.

Measurable Objective 6.1: The number of outreach and education sessions conducted, and the number of participants in those training sessions.

Action 6.2: Design and implement an outreach campaign to publicize fair housing law and policy during fair housing month (April) of every year.

Measurable Objective 6.2: The materials developed for the outreach campaign and the number of publications or websites through which those materials are distributed and publicized.

Public Sector Impediments, Suggested Actions, and Measurable Objectives

Impediment 1: Limited presence of fair housing enforcement entities in rural Georgia. This impediment was identified through the review of the state’s fair housing enforcement entities, as well as in consultation with stakeholders who participated in public outreach sessions during the AI process, including the 2015 Fair Housing Focus Groups and Forums.

Action 1.1: Compile a statewide database of local private organizations that provide fair housing complaint referral or other fair housing services. Include information on these entities and fair housing laws and updates in DCA’s current communications through newsletters to promote the dissemination of information concerning developments in fair housing policy and trends in fair housing enforcement and complaints.

Measurable Objective 1.1: Compilation of the database utilizing existing channels of communications concerning fair housing law. Note: The database will likely be compiled on an ongoing basis as more local providers are identified.

Impediment 2: Need for additional outreach and education. This impediment was identified in consultation with stakeholders who participated in the 2015 Fair Housing Focus Groups and Forum presentations, as well as through the review of responses to the 2015 Fair Housing Survey.

Action 2.1: Conduct outreach and education pertaining to fair housing, targeting local government agencies, sub recipients or grantees of DCA funding and PHAs, with the goal of keeping public officials throughout the state apprised of ongoing changes to fair housing law and policy.

Measurable Objective 2.1: The number of outreach and education sessions conducted and the number of agencies and officials participating in those sessions.

Action 2.2: Design and implement an outreach campaign to publicize fair housing law and policy during fair housing month (April) of every year.

Measurable Objective 2.2: The materials developed for the outreach campaign and the number of publications or websites through which those materials are distributed and publicized.

Impediment 3: NIMBYism and public policies used to limit access to affordable housing. This impediment was identified through the review of responses to the 2015 Fair Housing Survey.

Action 3.1: Share existing data and information on the impact of NIMBYism with sub recipients, local grantees and public housing agencies (PHAs) outlining the implications of the recent Supreme Court decision in *Texas Department of Housing and Community Development v. Inclusive Communities Project* for the development and placement of affordable housing units.

Measurable Objective 3.1: The number of local grantees and public housing agencies who receive the data and information disseminated, and any responses.

Impediment 4: Individuals with Housing Choice Vouchers (HCVs) predominately reside in high minority concentrated areas. This impediment was identified through the review of the location of Housing Choice Voucher recipients throughout the state.

Action 4.1: Conduct outreach to landlords and property owners on making units throughout the state available to persons with HCV while developing and implementing policies in the Low Income Housing Tax Credit (LIHTC) program that encourage the development of affordable housing units in communities of opportunity.

Measurable Objective 4.1: The number of outreach activities to landlords and property owners as well as documenting the policies in the Qualified Allocation Plan for the LIHTC program focused on affordable housing developments in communities of opportunities.

Impediment 5: Limited knowledge of fair housing law in rural areas of the state. This impediment was identified through the review of the results of the 2015 Fair Housing Survey, as well as in consultation with stakeholders who participated in the 2015 Fair Housing Focus Groups and Forum presentations.

Action 5.1: Conduct ongoing fair housing outreach and education sessions, in partnership with the entities identified in fulfillment of Public Sector Action 2.1, targeting housing providers and consumers.

Measurable Objective 5.1: The number of outreach and education sessions conducted, and the number of participants in those outreach and education sessions.

SECTION II. JURISDICTIONAL BACKGROUND INFORMATION

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 in non-entitlement areas of the State of Georgia.

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, which span the years from 2009 through 2013, 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.

DEMOGRAPHIC DATA

Population, age, race and ethnicity are important demand factors that influence choice and location within local housing markets. As part of the essential review of the background context of the markets which housing choices are made in non-entitlement areas of Georgia, detailed population and demographic data are included to describe the residents of these areas. These data summarize not only the protected class populations, but characteristics of the total population for the entire state’s non-entitlement areas, as well as the outcome of housing location choices. These data help to address whether over-concentrations of racial and ethnic minorities exist, and if so, which areas of the state are most affected.

POPULATION DYNAMICS

Table II.1 at right presents population counts in non-entitlement areas of the State of Georgia; as drawn from the 2000 and 2010 Censuses; intercensal estimates for the years from 2001 through 2009, and postcensal estimates from 2011 through 2014. As shown, the population of the state’s non-entitlement areas grew by 16.7 percent over the 14-year period. Growth between Census counts was generally steady.

Table II.1
Census and Intercensal
Population Estimates
Non-Entitlement Areas of
Georgia
2000, 2010 Census and Intercensal
Estimates

Year	Estimate
Census 2000	4,176,664
July 2001 Est.	4,085,553
July 2002 Est.	4,169,342
July 2003 Est.	4,247,276
July 2004 Est.	4,335,598
July 2005 Est.	4,428,363
July 2006 Est.	4,542,737
July 2007 Est.	4,653,897
July 2008 Est.	4,737,166
July 2009 Est.	4,791,313
Census 2010	4,818,708
July 2011 Est.	4,785,953
July 2012 Est.	4,806,769
July 2013 Est.	4,833,883
July 2014 Est.	4,873,929
Change 00 – 14	16.7%

POPULATION BY AGE

The population of Georgia's non-entitlement areas increased by 15.4 percent between 2000 and 2010, as shown in Table II.2 below. Approximately 12 percent of the 4,818,708 living in those non-entitlement areas were aged 55 to 64 in 2010, and a similar proportion were aged 65 or older. These age cohorts both grew considerably in number, and as a percentage of the overall population, between the two Censuses. By contrast, all of the younger cohorts grew at a rate that was below the overall average rate, and came to represent smaller percentages of the population. A similar trend was observed in the combined population of the state's entitlement areas, which grew by 21.4 percent over the decade, largely due to substantial growth in the number of residents aged 55 to 64, along with those aged 65 and older.

Table II.2
Population by Age

State of Georgia
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00-10
	Population	% of Total	Population	% of Total	
Non-Entitlement Areas of Georgia					
Under 5	298,350	7.1%	328,403	6.8%	10.1%
5 to 19	947,465	22.7%	1,046,701	21.7%	10.5%
20 to 24	276,113	6.6%	304,761	6.3%	10.4%
25 to 34	591,199	14.2%	589,041	12.2%	-0.4%
35 to 54	1,225,082	29.3%	1,375,550	28.5%	12.3%
55 to 64	376,547	9.0%	575,380	11.9%	52.8%
65 or Older	461,908	11.1%	598,872	12.4%	29.7%
Total	4,176,664	100.0%	4,818,708	100.0%	15.4%
Entitlement Areas of Georgia					
Under 5	296,800	7.4%	358,382	7.4%	20.7%
5 to 19	872,155	21.8%	1,048,143	21.5%	20.2%
20 to 24	316,083	7.9%	375,319	7.7%	18.7%
25 to 34	708,057	17.7%	746,519	15.3%	5.4%
35 to 54	1,208,418	30.1%	1,413,242	29.0%	16.9%
55 to 64	284,909	7.1%	494,177	10.1%	73.5%
65 or Older	323,367	8.1%	433,163	8.9%	34.0%
Total	4,009,789	100.0%	4,868,945	100.0%	21.4%
State of Georgia					
Under 5	595,150	7.3%	686,785	7.1%	15.4%
5 to 19	1,819,620	22.2%	2,094,844	21.6%	15.1%
20 to 24	592,196	7.2%	680,080	7.0%	14.8%
25 to 34	1,299,256	15.9%	1,335,560	13.8%	2.8%
35 to 54	2,433,500	29.7%	2,788,792	28.8%	14.6%
55 to 64	661,456	8.1%	1,069,557	11.0%	61.7%
65 or Older	785,275	9.6%	1,032,035	10.7%	31.4%
Total	8,186,453	100.0%	9,687,653	100.0%	18.3%

The elderly population grew by 29.7 percent in the state's non-entitlement areas between 2000 and 2010. As shown in Table II.3 on the following page, much of this growth was attributable to rapid growth at the younger end of the elderly cohort, which includes residents aged 65 to 74. These residents accounted for over 70 percent of the growth in the elderly population in the state's non-entitlement areas, and over 66 percent of the growth in the state's entitlement areas, where the elderly population as a whole increased by 34 percent.

Table II.3
Elderly Population by Age
 State of Georgia
 2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Non-Entitlement Areas of Georgia					
65 to 66	59,231	12.8%	89,427	14.9%	51.0%
67 to 69	81,878	17.7%	118,663	19.8%	44.9%
70 to 74	118,062	25.6%	149,111	24.9%	26.3%
75 to 79	91,423	19.8%	106,728	17.8%	16.7%
80 to 84	60,896	13.2%	72,969	12.2%	19.8%
85 or Older	50,418	10.9%	61,974	10.3%	22.9%
Total	461,908	100.0%	598,872	100.0%	29.7%
Entitlement Areas of Georgia					
65 to 66	40,177	12.4%	65,218	15.1%	62.3%
67 to 69	55,348	17.1%	82,699	19.1%	49.4%
70 to 74	80,999	25.0%	101,311	23.4%	25.1%
75 to 79	66,146	20.5%	76,007	17.5%	14.9%
80 to 84	43,258	13.4%	56,079	12.9%	29.6%
85 or Older	37,439	11.6%	51,849	12.0%	38.5%
Total	323,367	100.0%	433,163	100.0%	34.0%
State of Georgia					
65 to 66	99,408	12.7%	154,645	15.0%	55.6%
67 to 69	137,226	17.5%	201,362	19.5%	46.7%
70 to 74	199,061	25.3%	250,422	24.3%	25.8%
75 to 79	157,569	20.1%	182,735	17.7%	16.0%
80 to 84	104,154	13.3%	129,048	12.5%	23.9%
85 or Older	87,857	11.2%	113,823	11.0%	29.6%
Total	785,275	100.0%	1,032,035	100.0%	31.4%

POPULATION BY RACE AND ETHNICITY

Nearly three quarters of the residents in the state’s non-entitlement areas were white in 2000, while 21.6 percent of residents were black. As shown in Table II.4 on the following page, these percentages declined slightly over the following decade, due in large part to rapid growth in the percentage of residents who identified their race as “other”. Similarly, the non-Hispanic population declined as a proportion of the total non-entitlement population by just under three percentage points, while Hispanic residents of all races grew as a percentage of the total population. By 2010, around 6.4 percent of the non-entitlement population was Hispanic. Hispanic residents also accounted for a larger percentage of the population in the state’s entitlement areas in that year, at 11.2 percent, as did the black population, which represented 39.4 percent of the entitlement-area population.

Black residents of the state’s non-entitlement areas tended to be more concentrated in Census tracts in the center of the state, as shown in Map II.1 on page 19. In many Census tracts throughout this area, black residents represented more than three-quarters of all residents in 2000, and as much as 98.2 percent of the population. These areas include Census tracts in and around Dublin, Albany, Warner Robins, and Hinesville, along with some large, rural Census tracts near Greensboro. Many of these areas retained high percentages of black residents in 2010, as shown in Map II.2 on page 20. Indeed, the overall distribution of black residents in the state was similar in 2010 to what it had been at the beginning of the decade. However, black residents had come to account for considerably larger percentages of the population in

suburban Census tracts near the Atlanta metropolitan area. In both years, black residents accounted for relatively small percentages of the population in Census tracts throughout the north of the state.

Table II.4
Population by Race and Ethnicity, 2000 and 2010

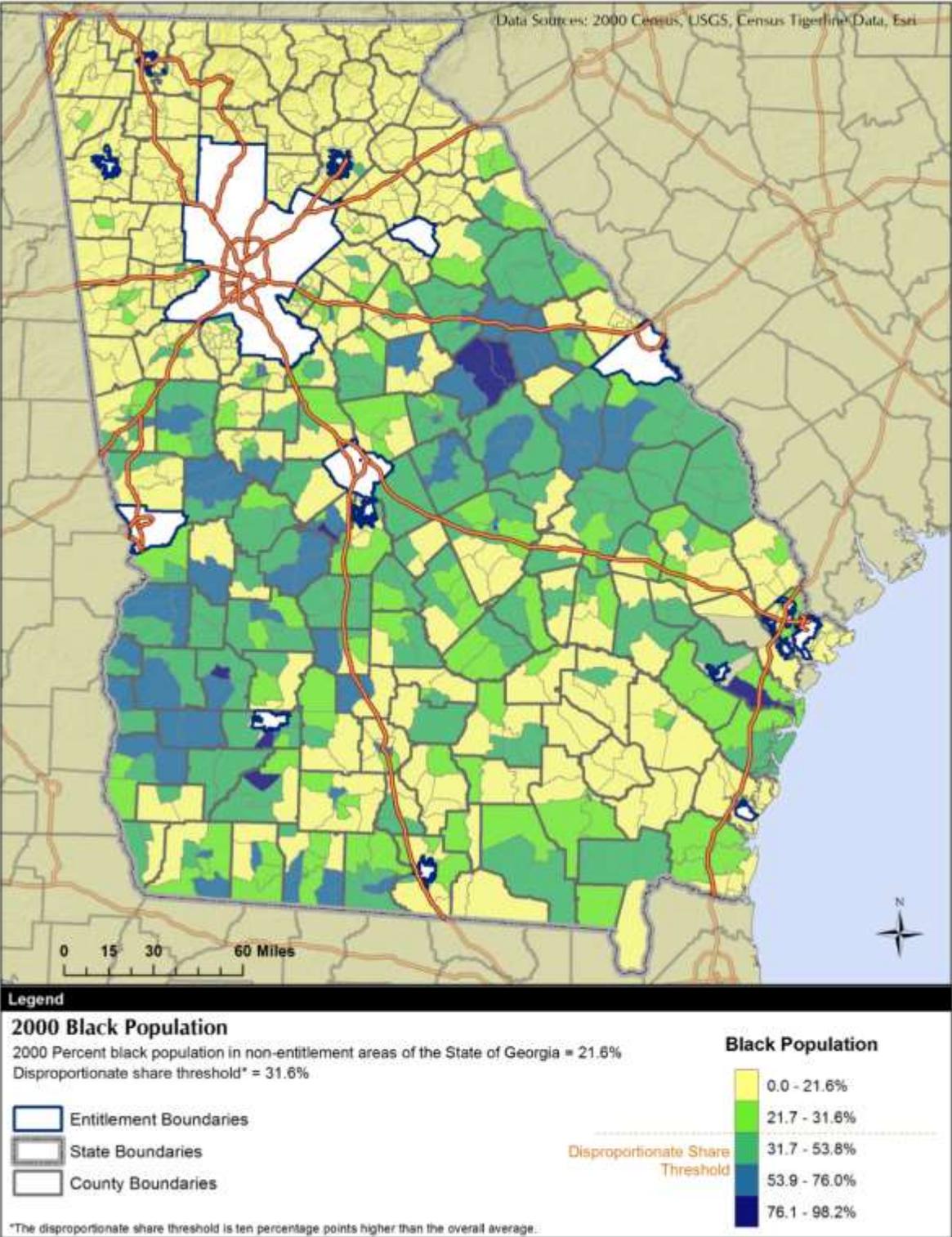
Non-Entitlement Areas of Georgia
2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00-10
	Population	% of Total	Population	% of Total	
Non-Entitlement Areas of Georgia					
White	3,115,416	74.6%	3,467,846	72.0%	11.3%
Black	900,590	21.6%	1,034,419	21.5%	14.9%
American Indian	11,718	0.3%	15,095	0.3%	28.8%
Asian	33,670	0.8%	66,479	1.4%	97.4%
Native Hawaiian/ Pacific Islander	2,042	0.0%	3,051	0.1%	49.4%
Other	69,917	1.7%	147,987	3.1%	111.7%
Two or More Races	43,311	1.0%	83,831	1.7%	93.6%
Total	4,176,664	100.0%	4,818,708	100.0%	15.4%
Non-Hispanic	4,028,096	96.4%	4,511,071	93.6%	12.0%
Hispanic	148,568	3.6%	307,637	6.4%	107.1%
Entitlement Areas of Georgia					
White	2,211,865	55.2%	2,319,594	47.6%	4.9%
Black	1,448,952	36.1%	1,916,016	39.4%	32.2%
American Indian	10,019	0.2%	17,056	0.4%	70.2%
Asian	139,500	3.5%	247,988	5.1%	77.8%
Native Hawaiian/ Pacific Islander	2,204	0.1%	3,748	0.1%	70.1%
Other	126,372	3.2%	240,885	4.9%	90.6%
Two or More Races	70,877	1.8%	123,658	2.5%	74.5%
Total	4,009,789	100.0%	4,868,945	100.0%	21.4%
Non-Hispanic	3,723,130	92.9%	4,322,893	88.8%	16.1%
Hispanic	286,659	7.1%	546,052	11.2%	90.5%
State of Georgia					
White	5,327,281	65.1%	5,787,440	59.7%	8.6%
Black	2,349,542	28.7%	2,950,435	30.5%	25.6%
American Indian	21,737	0.3%	32,151	0.3%	47.9%
Asian	173,170	2.1%	314,467	3.2%	81.6%
Native Hawaiian/ Pacific Islander	4,246	0.1%	6,799	0.1%	60.1%
Other	196,289	2.4%	388,872	4.0%	98.1%
Two or More Races	114,188	1.4%	207,489	2.1%	81.7%
Total	8,186,453	100.0%	9,687,653	100.0%	18.3%
Non-Hispanic	7,751,226	94.7%	8,833,964	91.2%	14.0%
Hispanic	435,227	5.3%	853,689	8.8%	96.1%

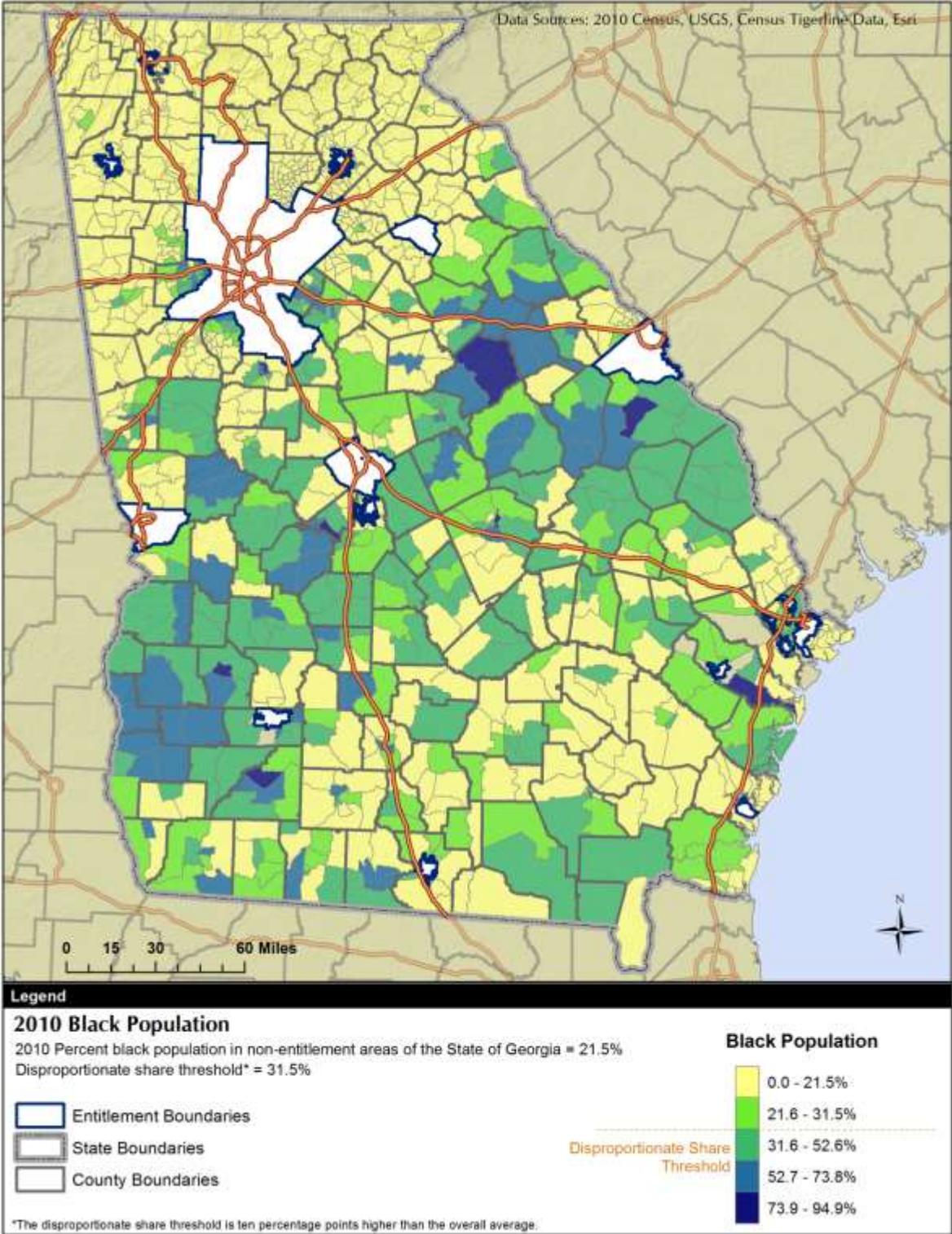
Hispanic residents, who accounted for 3.6 percent of the state's non-entitlement population in 2000, tended to be most highly concentrated in northern Census tracts, as shown in Map II.3 on page 21. The highest concentrations of Hispanic residents were observed around Gainesville, where as much as 69.2 percent of residents were Hispanic; to the southeast of Atlanta; and around Dalton in the north. There was also a band of Census tracts in the southeast of the state with above average concentrations of Hispanic residents.

The distribution of the Hispanic population throughout the state's non-entitlement areas was similar in 2010 to what it had been in 2000, as shown in Map II.4 on page 22. However, Hispanic residents had come to account for even larger percentages of the population in areas in which these residents were previously concentrated.

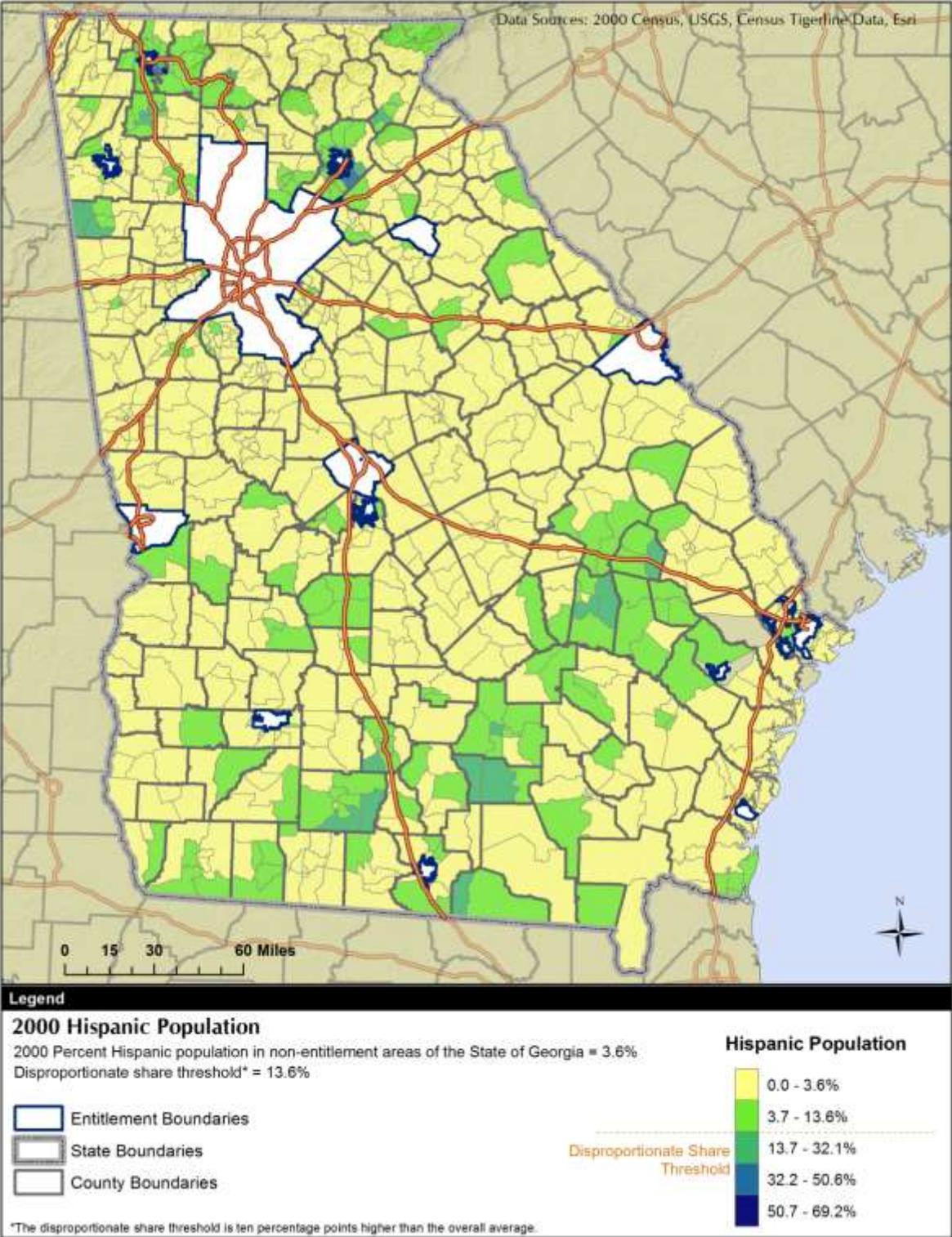
Map II.1
Black Population by Census Tract, 2000
Non-Entitlement Areas of Georgia
2000 Census Data



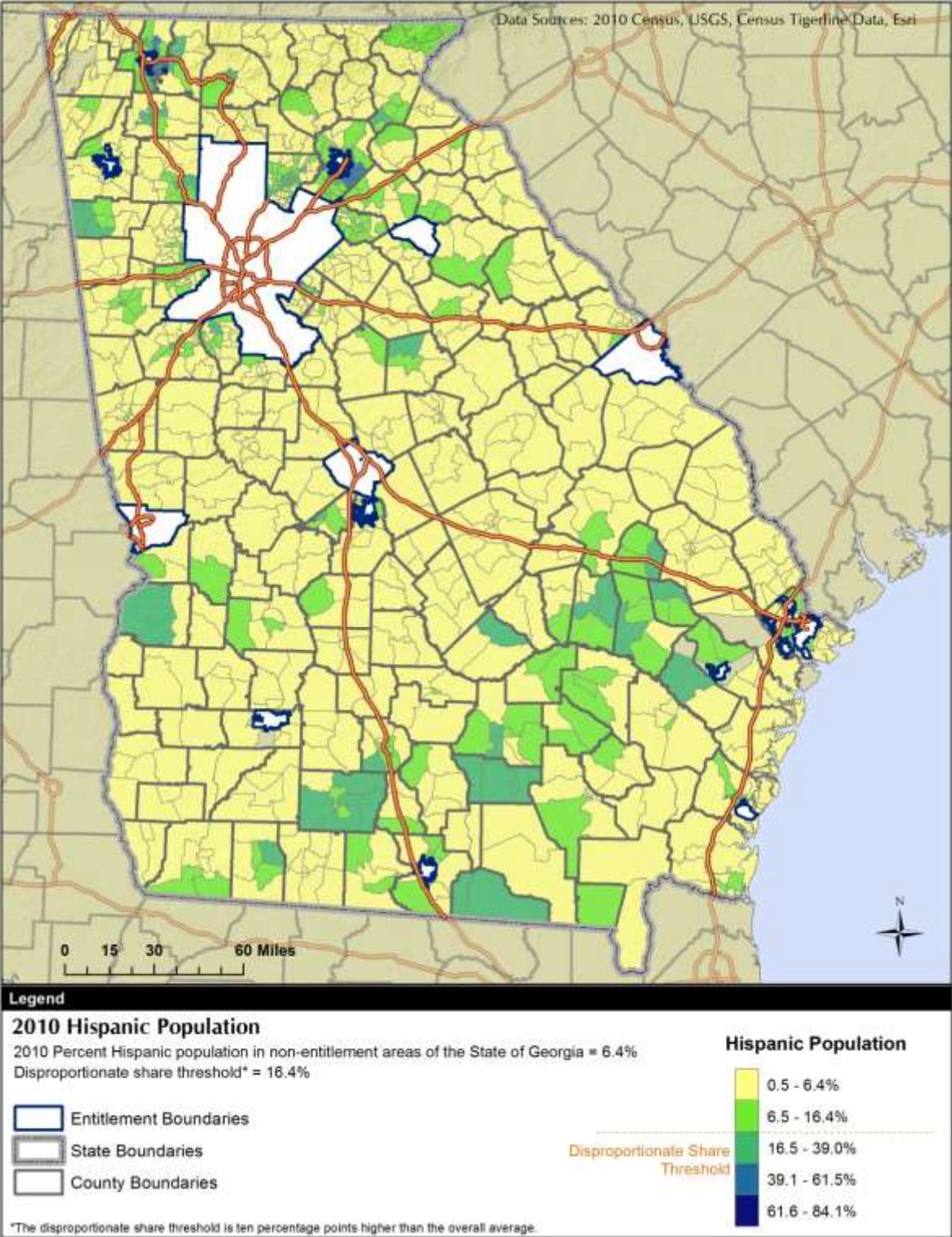
Map II.2 Black Population by Census Tract, 2010 Non-Entitlement Areas of Georgia 2010 Census Data



Map II.3
Hispanic Population by Census Tract, 2000
Non-Entitlement Areas of Georgia
2000 Census Data



Map II.4 Percent Hispanic Population by Census Tract, 2010 Non-Entitlement Areas of Georgia 2010 Census Data



Since 2010, black and Hispanic residents have continued to represent similar percentages of the population in the state’s entitlement areas. The same was true in the state’s non-entitlement areas, as shown in Table II.5 below.

**Table II.5
Population by Race and Ethnicity, After 2010**

Non-Entitlement Areas of Georgia
2000 & 2010 Census SF1 Data

Race	2010 Census		2013 5-Year ACS Census	
	Population	% of Total	Population	% of Total
Non-Entitlement Areas of Georgia				
White	3,467,846	72.0%	3,533,365	72.9%
Black	1,034,419	21.5%	1,054,800	21.8%
American Indian	15,095	0.3%	11,240	0.2%
Asian	66,479	1.4%	69,723	1.4%
Native Hawaiian/ Pacific Islander	3,051	0.1%	1,547	0.0%
Other	147,987	3.1%	98,061	2.0%
Two or More Races	83,831	1.7%	78,400	1.6%
Total	4,818,708	100.0%	4,847,136	100.0%
Non-Hispanic	4,511,071	93.6%	4,528,574	93.4%
Hispanic	307,637	6.4%	318,562	6.6%
Entitlement Areas of Georgia				
White	2,319,594	47.6%	2,415,612	48.7%
Black	1,916,016	39.4%	1,956,184	39.4%
American Indian	17,056	0.4%	13,256	0.3%
Asian	247,988	5.1%	260,669	5.3%
Native Hawaiian/ Pacific Islander	3,748	0.1%	3,007	0.1%
Other	240,885	4.9%	199,783	4.0%
Two or More Races	123,658	2.5%	114,770	2.3%
Total	4,868,945	100.0%	4,963,281	100.0%
Non-Hispanic	4,322,893	88.8%	4,405,994	88.8%
Hispanic	546,052	11.2%	557,287	11.2%
State of Georgia				
White	5,787,440	59.7%	5,948,977	60.6%
Black	2,950,435	30.5%	3,010,984	30.7%
American Indian	32,151	0.3%	24,496	0.2%
Asian	314,467	3.2%	330,392	3.4%
Native Hawaiian/ Pacific Islander	6,799	0.1%	4,554	0.0%
Other	388,872	4.0%	297,844	3.0%
Two or More Races	207,489	2.1%	193,170	2.0%
Total	9,687,653	100.0%	9,810,417	100.0%
Non-Hispanic	8,833,964	91.2%	8,934,568	91.1%
Hispanic	853,689	8.8%	875,849	8.9%

DISABILITY STATUS

Over one-fifth of residents in the state’s non-entitlement areas were living with some form of disability in 2000, as shown in Table II.6 on the following page, along with 17.7 percent of the state’s entitlement population. According to the 2013 Five-Year ACS, 13.9 percent of the state’s non-entitlement residents were living with disabilities in 2009-2013, as was 10 percent of the entitlement population, as shown in Table II.7 on the following page. It is important to note that those figures do not necessarily represent a drop in the disability rate. Because the definition of disability employed in 2000 differs considerably from the new definition adopted in 2008, figures from each year represent somewhat different populations, though there is considerable overlap between the two. For that reason, the Census Bureau discourages direct comparisons of figures from before and after 2008.

Residents with disabilities accounted for over a fifth of the state’s non-entitlement population in 2000. As shown in Map II.5 on the following page, residents with disabilities were not highly clustered in any specific geographic region. However, suburban Census tracts surrounding the Atlanta metropolitan area had lower-than-average disability rates, almost without exception, as well as in Census tracts near Savannah. This was due, in Census tracts to the northeast and west of Atlanta, to the large population of those Census tracts rather than the absence of residents with disabilities. By contrast, relatively few residents with disabilities lived in Census tracts between Atlanta and Macon in 2000.

The overall distribution of the population with disabilities had changed little by 2009-2013, as shown in Map II.6 on page 26. Census tracts with above-average disability rates were scattered throughout the state, as were tracts with below average disability rates. However, there were notable clusters of tracts with below-average disability rates in suburban Census tracts in and around the Atlanta metropolitan area and Savannah. Disability rates tended to be lower in coastal Census tracts.

**Table II.6
Disability by Age**

Non-Entitlement Areas of Georgia
2000 Census SF3 Data

Age	Total	
	Disabled Population	Disability Rate
Non-Entitlement Areas of Georgia		
5 to 15	41,692	6.0%
16 to 64	549,598	21.0%
65 and older	217,934	49.3%
Total	809,224	21.6%
Entitlement Areas of Georgia		
5 to 15	35,413	5.5%
16 to 64	471,564	17.5%
65 and older	140,611	45.0%
Total	647,588	17.7%
State of Georgia		
5 to 15	77,105	5.7%
16 to 64	1,021,162	19.2%
65 and older	358,545	47.5%
Total	1,456,812	19.7%

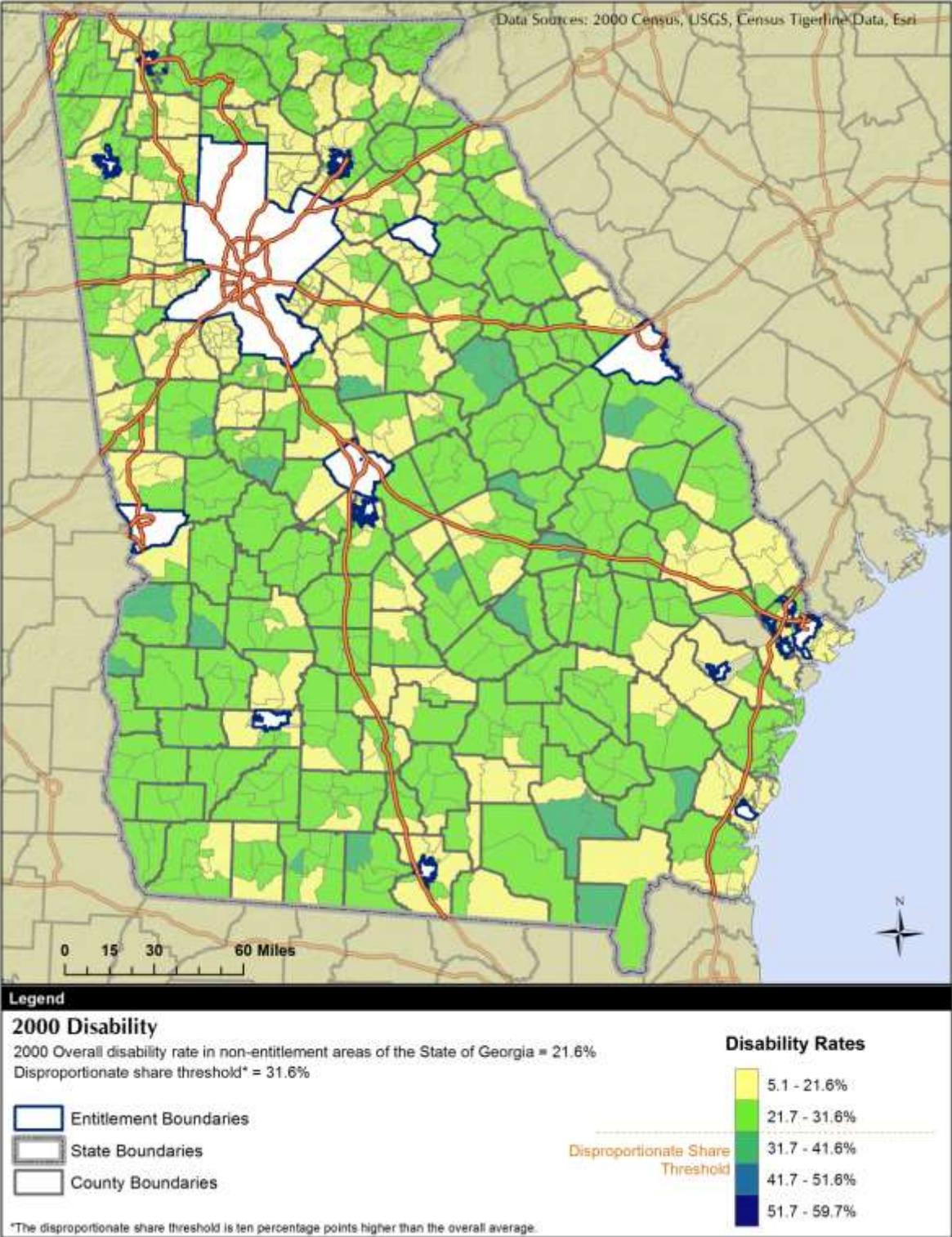
Table II.7

Disability by Age

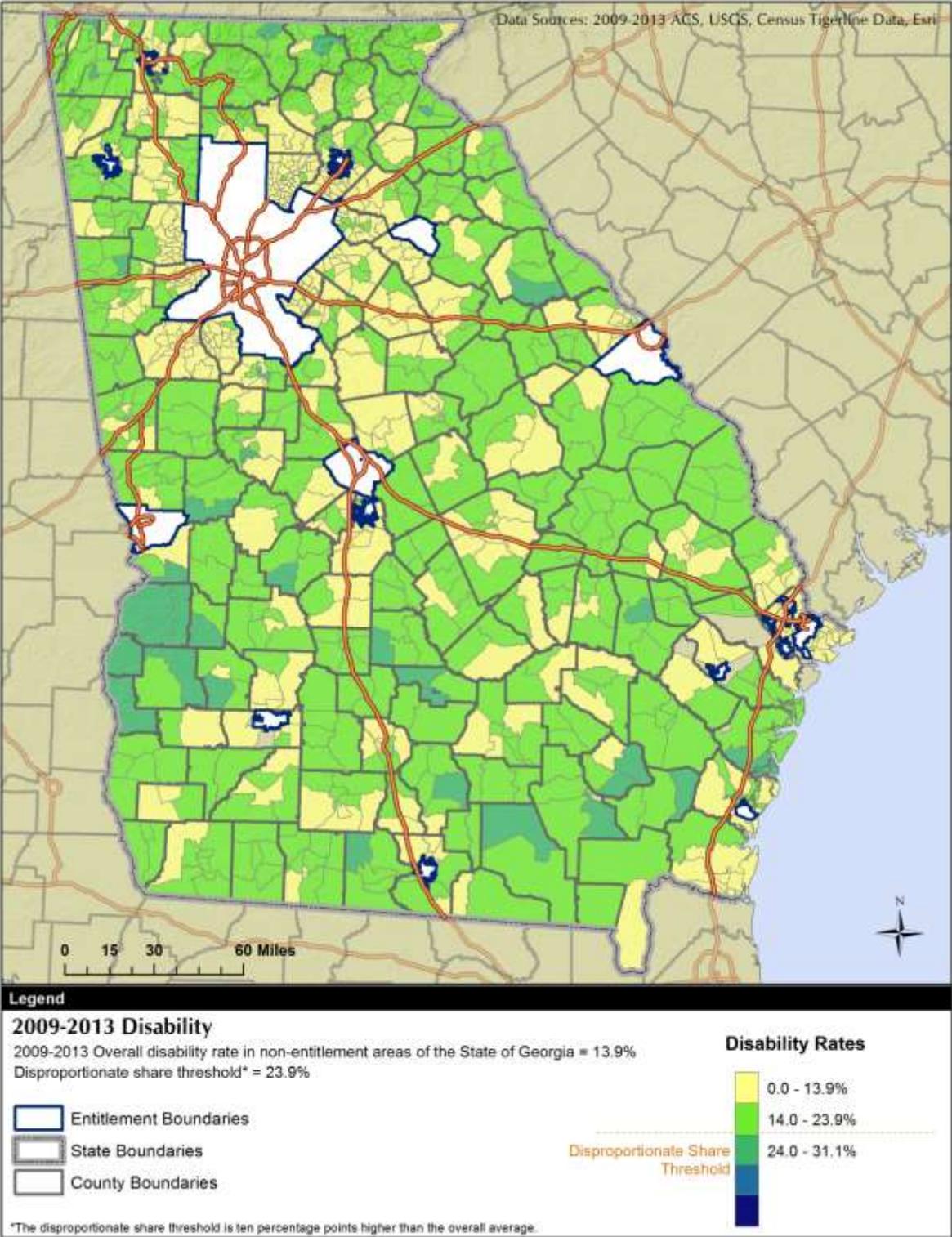
Non-Entitlement Areas of Georgia
2013 Five-Year ACS Data

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Non-Entitlement Areas of Georgia						
Under 5	1,641	1.0%	1,112	0.7%	2,753	0.9%
5 to 17	30,934	6.7%	18,536	4.2%	49,470	5.5%
18 to 34	33,759	7.0%	31,374	6.2%	65,133	6.6%
35 to 64	145,556	15.9%	150,794	15.3%	296,350	15.6%
65 to 74	55,429	31.5%	59,986	30.0%	115,415	30.7%
75 or Older	49,031	52.2%	80,765	56.9%	129,796	55.0%
Total	316,350	13.8%	342,567	14.1%	658,917	13.9%
Entitlement Areas of Georgia						
Under 5	1,525	0.8%	1,309	0.7%	2,834	0.8%
5 to 17	26,816	5.8%	15,539	3.5%	42,355	4.7%
18 to 34	31,645	5.2%	31,133	4.8%	62,778	5.0%
35 to 64	98,282	10.8%	117,300	11.6%	215,582	11.3%
65 to 74	29,753	24.8%	39,776	26.9%	69,529	26.0%
75 or Older	32,142	48.1%	63,571	55.7%	95,713	52.9%
Total	220,163	9.4%	268,628	10.6%	488,791	10.0%
State of Georgia						
Under 5	3,166	0.9%	2,421	0.7%	5,587	0.8%
5 to 17	57,750	6.3%	34,075	3.9%	91,825	5.1%
18 to 34	65,404	6.0%	62,507	5.4%	127,911	5.7%
35 to 64	243,838	13.4%	268,094	13.4%	511,932	13.4%
65 to 74	85,182	28.8%	99,762	28.7%	184,944	28.7%
75 or Older	81,173	50.5%	144,336	56.3%	225,509	54.1%
Total	536,513	11.6%	611,195	12.3%	1,147,708	11.9%

Map II.5
Population with Disabilities by Census Tract, 2000
Non-Entitlement Areas of Georgia
2000 Census Data



Map II.6 Population with Disabilities by Census Tract, 2009-2013 Non-Entitlement Areas of Georgia 2009-2013 ACS Data



Disability rates were higher for older residents than for younger residents in 2000 and 2008-2012. Just fewer than 50 percent of residents aged 65 and above, i.e., elderly residents, were reported to be living with disabilities in 2000. In 2008-2012, approximately forty percent of elderly residents were living with some form of disability. This trend, along with the growth in the elderly population in recent years discussed previously, is likely to increase demand for accessible housing in the state's non-entitlement areas.

EMPLOYMENT DATA

Data indicating the size and dynamics of job markets in the non-entitlement areas of Georgia, workforce, incomes, and persons in poverty provide essential contextual background and indicate the potential buying power of residents when making a housing choice.

LABOR FORCE AND EMPLOYMENT

The Bureau of Labor Statistics collects data on labor force participation and employment, and represents a count of people either working or seeking work. These data are collected through the Current Employment Statistics program, which surveys about 144,000 businesses and government agencies each month. The unemployment rate is based on the gap between the number of employed persons and the total number in the labor force; this gap is represented as a percentage of the total labor force.

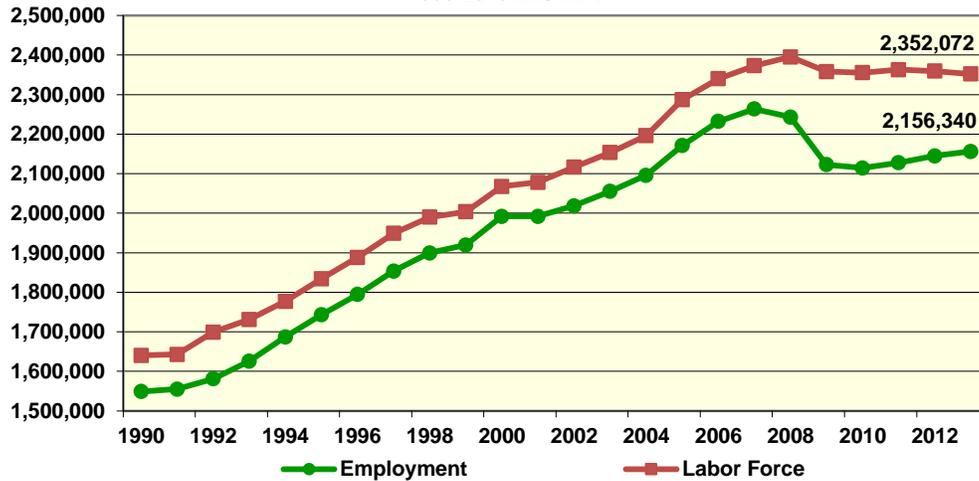
Growth in the state's non-entitlement⁸ labor markets was steady from 1990 through 2000, as shown in Diagram II.1 on the following page. Between 1990 and 1992, roughly 16,000 workers were being hired every year on average. That figure rose to more than 50,000 per year from 1992 through 2000, after which growth in the number of employed slowed to a trickle. Strong growth resumed in 2002, albeit at a slower pace than before 2000. This growth began to slacken in 2007 and, in the following year, the number of employed decreased for the first time in nearly two decades. However, the more dramatic drop in the number of employed came in 2009, when the number of employed persons in the state decreased by over 120,000. Since 2010, the job market has shown signs of recovery, though the rate of growth since that time has, on average, been below what was observed in the early 1990s.

Recent trends in the labor market reflect the impact of the nationwide recession of 2008 and 2009. The Obama Administration identified the State of Georgia, along with 17 other states and the District of Columbia, as one of the areas that was "hardest hit" by the housing crisis, based on unemployment figures and sharp declines in home values. The purpose of the Hardest Hit Fund was to provide targeted relief to homeowners whose home values had declined as a result of the recession, and who were struggling to pay their mortgages in the face of high unemployment.⁹

⁸ Note that the cities of Brunswick and Columbus are included in the state's non-entitlement areas for the purposes of the following discussion: because BLS data were not available for those cities, they could not be excluded from the analysis.

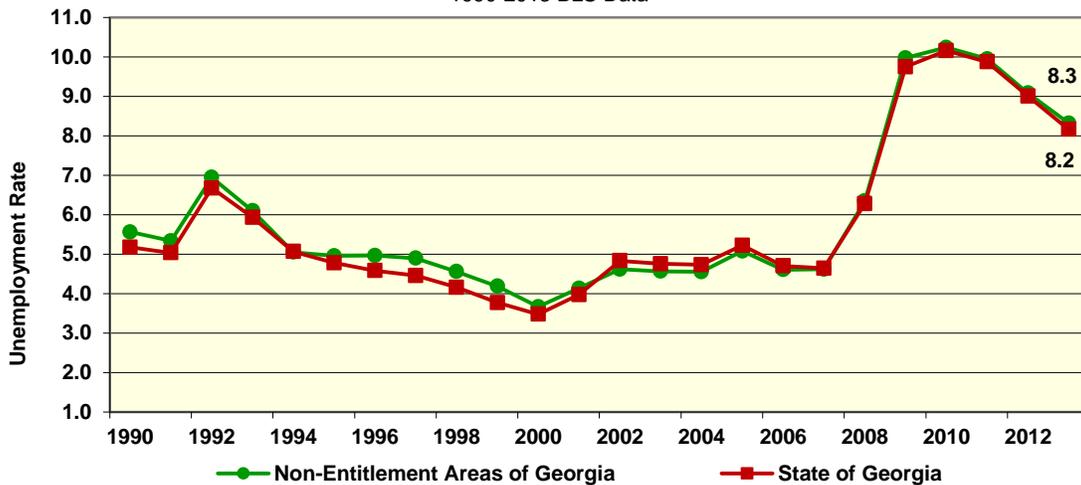
⁹ "Hardest Hit Fund". US Department of Treasury website. Accessed November 4, 2015 from <http://www.treasury.gov/initiatives/financial-stability/TARP-Programs/housing/hhf/Pages/default.aspx>.

Diagram II.1
Employment and Labor Force
 State of Georgia
 1990-2013 BLS Data

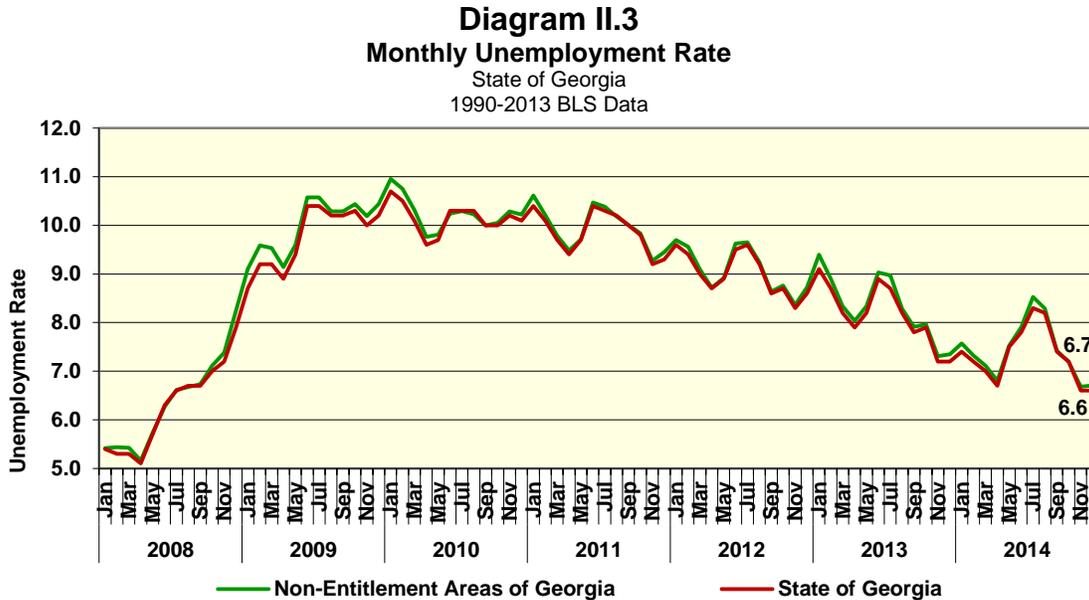


For most of those two decades trends in the labor force, which includes the number of employed as well as the number of those who are unemployed but looking for work, closely followed trends in the number of employed. In fact, as shown in Diagram II.2 below, the gap between the two narrowed between 1992 and 2000, leading to a steady decline in the unemployment rate during that period. However, the labor force continued to grow through 2008 amid slackening growth in the number of employed: the result was a 1.7 percentage point increase in the unemployment rate in that year. The dramatic drop in the number of employed the following year led to an even more dramatic increase in the unemployment rate, which rose to 9.7 percent in 2009 and topped ten percent the following year. Since that time, the unemployment rate has fallen steadily, due in part to stagnation in the labor force and steady, though slow, yearly growth in the number of employed.

Diagram II.2
Unemployment Rate
 State of Georgia
 1990-2013 BLS Data



Monthly unemployment data from the BLS indicate that high rates in unemployment persisted through early-2011. As shown in Diagram II.3 below, the unemployment rate has been on an overall decline since that time, notwithstanding the pronounced seasonal spikes in the unemployment rate in the winter and summer months.

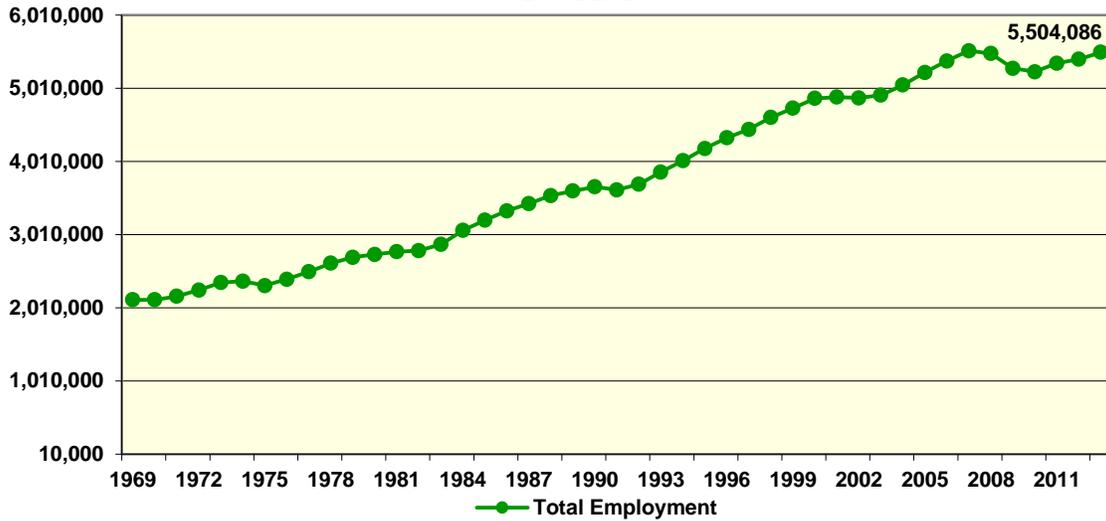


FULL- AND PART-TIME EMPLOYMENT AND EARNINGS

The Bureau of Economic Analysis (BEA) provided additional economic data for the State of Georgia. The BEA defines “total employment” as a count of jobs rather than workers, so workers can be counted twice in these data, e.g., those who work two or more part-time jobs. That the smallest geographic area for which these data are available is the county: as a result, most of the state’s entitlement jurisdictions could not be excluded from the analysis. For that reason, the trends discussed below pertain to the entire state, rather than just the state’s non-entitlement areas.

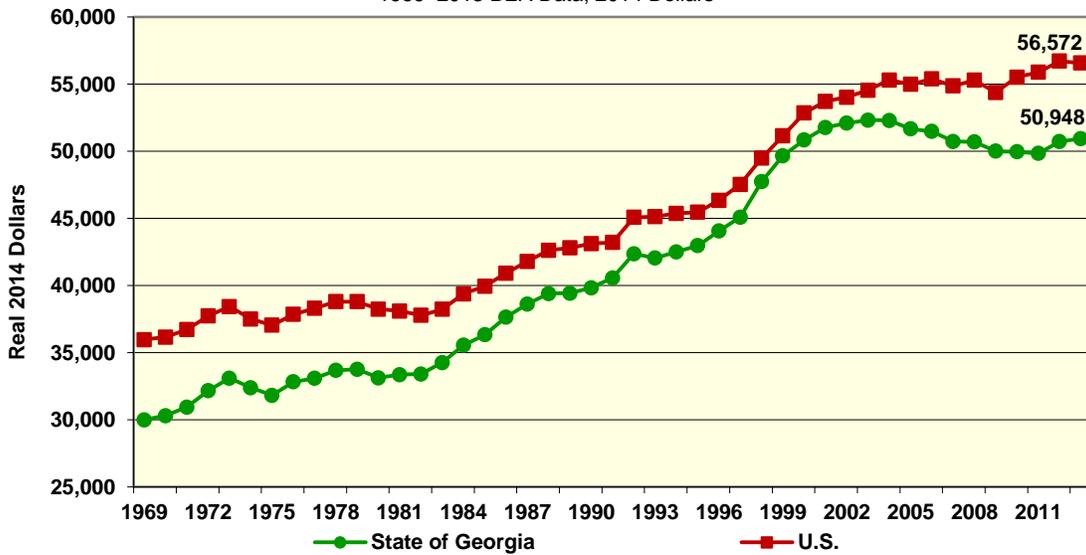
As shown in Diagram II.4 below, trends in total employment largely corresponded to trends in employment discussed above in the period from 1990 through 2013. In fact, these data suggest that at the state level, the steady growth of the 1990s and early 2000s is part of a larger trend in the state that stretches back to at least the early 1980s. That growth decreased off dramatically in 2001, and the total number of full- and part-time jobs in the state did not begin to grow again until 2004. The renewal of growth in total employment after 2004 was relatively short-lived, however, as the state lost around 286,000 full- and part-time jobs from 2008 through 2010. Total employment has grown steadily since 2010, and stood at 5,504,086 jobs in 2013.

Diagram II.4
Full- and Part-Time Employment
 State of Georgia
 1969–2013 BEA Data



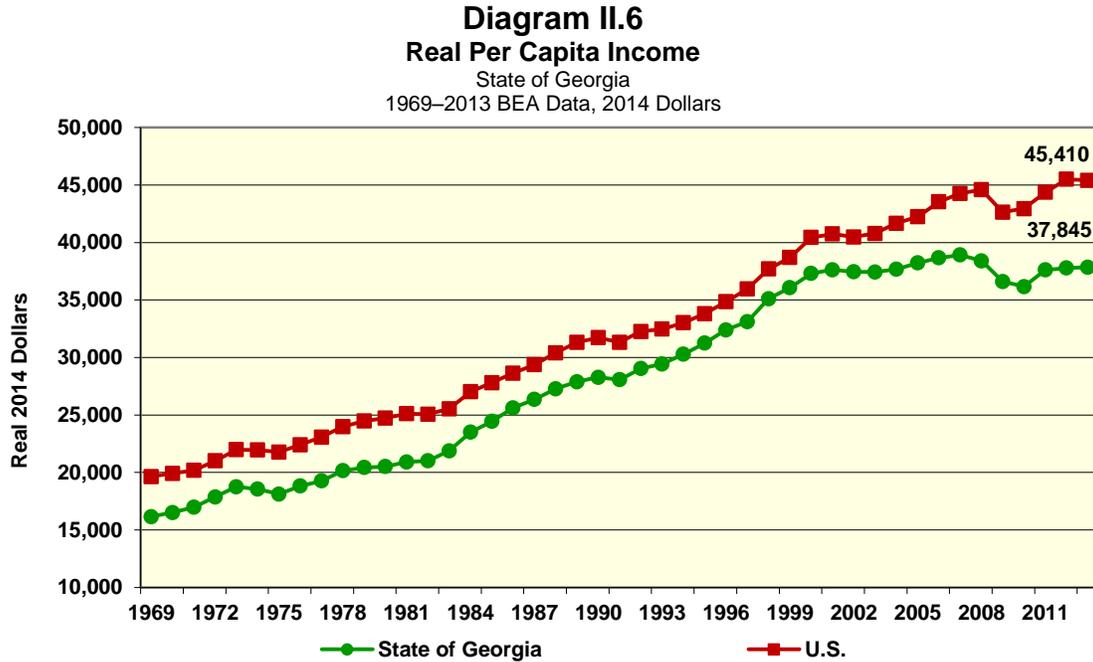
As more and more jobs were added to the state’s economy between 1990 and 2000, the average amount that workers earned at those jobs grew considerably. However, as shown in Diagram II.5 below, growth in real average earnings per job had already begun to slow by 2000, and began to decline in the mid-2000s after peaking at \$52,323 per year in 2003, in 2014 dollars. By 2011, average earnings had fallen below \$50,000 and, though earnings have begun to rebound in recent years, they have yet to rise to the levels observed in the early 2000s.

Diagram II.5
Real Average Earnings Per Job
 State of Georgia
 1969–2013 BEA Data, 2014 Dollars



Unlike earnings, growth in real per capita income (PCI) was steady throughout the nineties and continued to grow through the year 2000. However, as shown in Diagram II.6 on the following page, growth in real PCI leveled off after 2000. Modest growth in incomes resumed in 2005, only to end in 2008 with a decline in PCI of around \$515 per year. That decline accelerated in

the following year, and by 2010 the average resident had an income that was roughly \$2,800 per year lower, in real dollars, than it had been in 2007. Real PCI ticked upward in 2011, though growth has been tepid since that time.



INCOME DATA

HOUSEHOLD INCOME

The average income in the state’s non-entitlement areas appears to have increased between 2000 and 2013, as the growth in the number and percentage of higher income households outpaced growth in lower income households. As shown in Table II.8 on the following page, the most pronounced growth occurred among households earning more than \$100,000 per year, which more than doubled in number over the time period and came to account for 16.8 percent of all households in the state’s non-entitlement areas in 2009-2013. By contrast, the number of households earning less than \$15,000 per year decreased by over 16,000. In the entitlement areas of the state, a different pattern emerged, as the number and percentage of households earning less than \$20,000 grew, the number and percentage of households earning more than \$100,000 grew considerably more, and the percentage of all households in between decreased.

Table II.8

Households by Income

Non-Entitlement Areas of Georgia
2000 Census SF3 & 2013 Five-Year ACS Data

Income	2000 Census		2013 Five-Year ACS	
	Households	% of Total	Households	% of Total
Non-Entitlement Areas of Georgia				
Less than \$15,000	279,869	18.4%	263,565	15.3%
\$15,000 to \$19,999	101,246	6.7%	105,643	6.1%
\$20,000 to \$24,999	106,960	7.1%	105,348	6.1%
\$25,000 to \$34,999	203,763	13.4%	192,636	11.2%
\$35,000 to \$49,999	262,518	17.3%	247,529	14.4%
\$50,000 to \$74,999	293,517	19.3%	317,034	18.4%
\$75,000 to \$99,999	137,633	9.1%	201,922	11.7%
\$100,000 or More	131,444	8.7%	289,444	16.8%
Total	1,516,950	100.0%	1,723,121	100.0%
Entitlement Areas of Georgia				
Less than \$15,000	201,006	13.5%	246,502	13.7%
\$15,000 to \$19,999	76,430	5.1%	94,430	5.3%
\$20,000 to \$24,999	84,643	5.7%	95,231	5.3%
\$25,000 to \$34,999	174,926	11.7%	190,977	10.6%
\$35,000 to \$49,999	240,443	16.1%	241,272	13.4%
\$50,000 to \$74,999	299,686	20.1%	317,482	17.7%
\$75,000 to \$99,999	174,018	11.7%	205,206	11.4%
\$100,000 or More	239,576	16.1%	403,876	22.5%
Total	1,490,728	100.0%	1,794,976	100.0%
State of Georgia				
Less than \$15,000	480,875	16.0%	510,067	14.5%
\$15,000 to \$19,999	177,676	5.9%	200,073	5.7%
\$20,000 to \$24,999	191,603	6.4%	200,579	5.7%
\$25,000 to \$34,999	378,689	12.6%	383,613	10.9%
\$35,000 to \$49,999	502,961	16.7%	488,801	13.9%
\$50,000 to \$74,999	593,203	19.7%	634,516	18.0%
\$75,000 to \$99,999	311,651	10.4%	407,128	11.6%
\$100,000 or More	371,020	12.3%	693,320	19.7%
Total	3,007,678	100.0%	3,518,097	100.0%

POVERTY

In spite of the shift toward higher incomes, the poverty rate¹⁰ in the state’s non-entitlement areas increased after 2000, rising from 13.7 percent to 18.1 percent in 2009-2013, as shown in Table II.9 on the following page. The same was true in the state’s entitlement areas, though here the increase was more pronounced: from 12.3 percent in 2000, the poverty rate had grown to 18.3 percent by 2013.

¹⁰ 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 official poverty definition counts income before taxes and does not include capital gains and non-cash benefits such as Medicaid and food stamps.

Table II.9
Poverty by Age

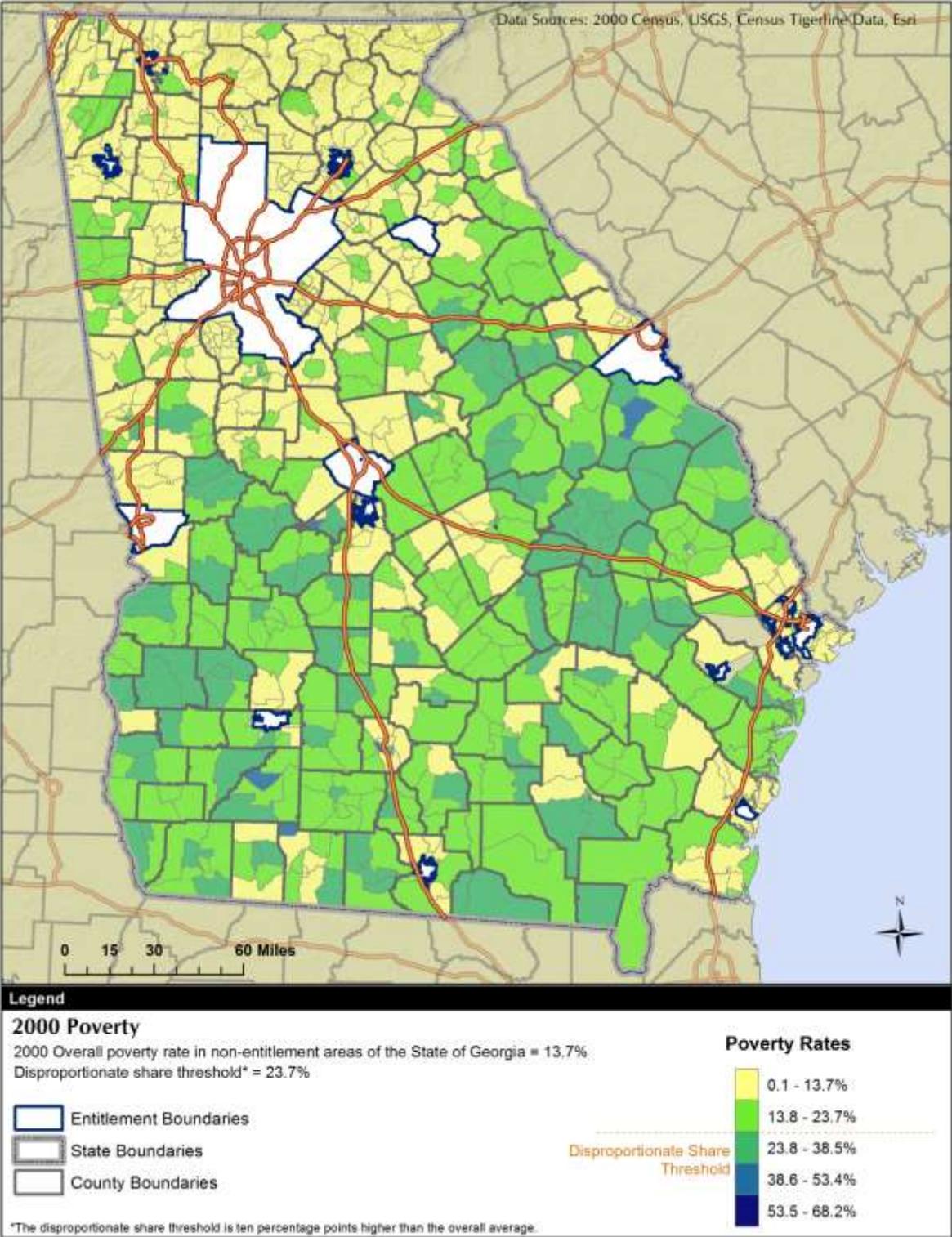
Non-Entitlement Areas of Georgia
2000 Census SF3 & 2013 Five-Year ACS Data

Age	2000 Census		2013 Five-Year ACS	
	Persons in Poverty	% of Total	Persons in Poverty	% of Total
Non-Entitlement Areas of Georgia				
Under 6	67,278	12.2%	107,352	12.6%
6 to 17	130,604	23.6%	191,106	22.5%
18 to 64	288,818	52.2%	482,896	56.8%
65 or Older	66,417	12.0%	69,150	8.1%
Total	553,117	100.0%	850,504	100.0%
Poverty Rate	13.7%	.	18.1%	.
Entitlement Areas of Georgia				
Under 6	60,073	12.5%	124,999	14.1%
6 to 17	107,451	22.4%	197,871	22.3%
18 to 64	277,341	57.7%	514,007	58.0%
65 or Older	35,811	7.5%	49,299	5.6%
Total	480,676	100.0%	886,176	100.0%
Poverty Rate	12.3%	.	18.3%	.
State of Georgia				
Under 6	127,351	12.3%	232,351	13.4%
6 to 17	238,055	23.0%	388,977	22.4%
18 to 64	566,159	54.8%	996,903	57.4%
65 or Older	102,228	9.9%	118,449	6.8%
Total	1,033,793	100.0%	1,736,680	100.0%
Poverty Rate	13.0%	.	18.2%	.

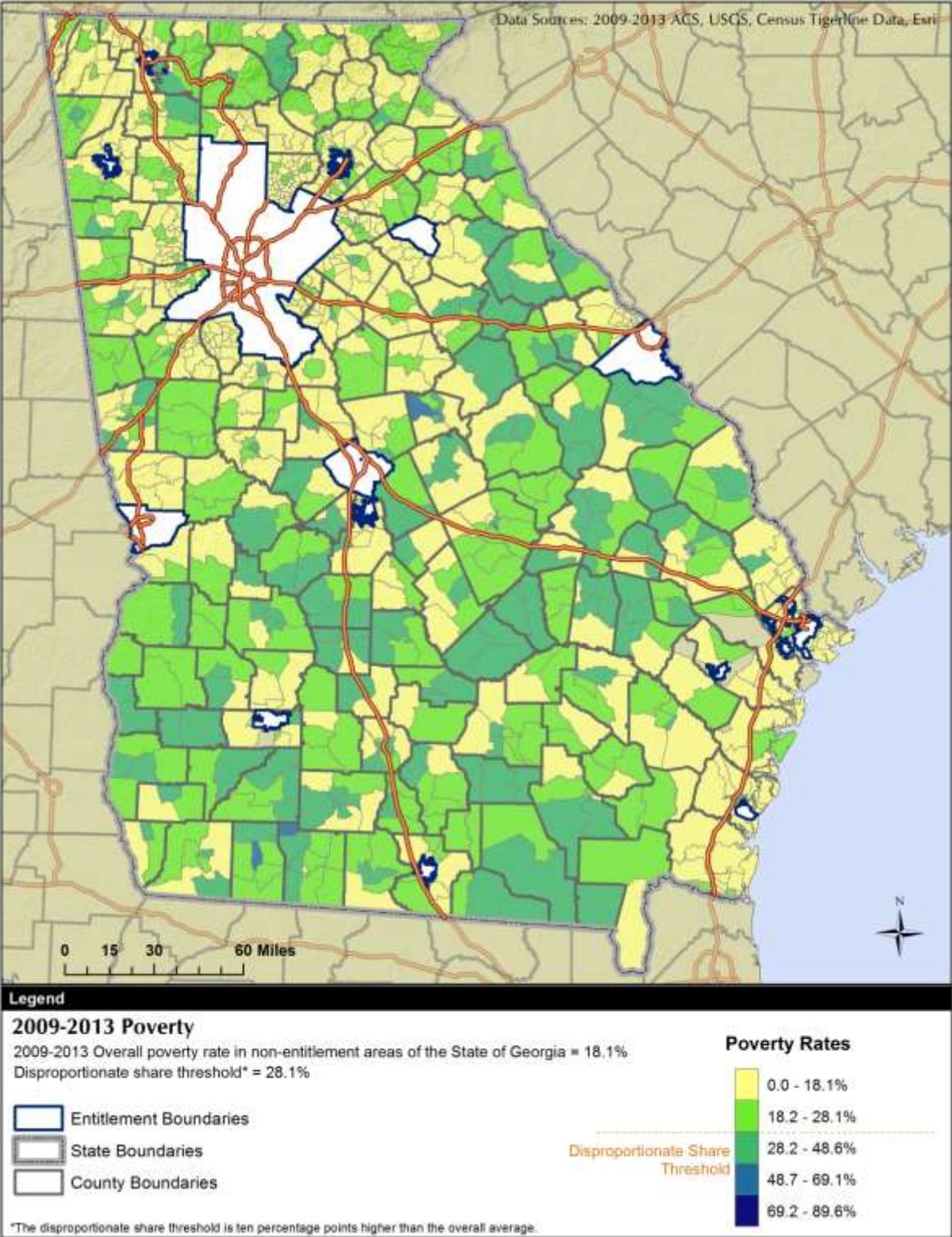
In 2000, Census tracts with relatively high concentrations of residents living in poverty tended to be clustered in rural areas in the center and south of the state, as shown in Map II.7 on the following page. More than half of the population was living in poverty in Census tracts in and around Statesboro and Dublin. By comparison, most of the Census tracts in the northern part of the state, including suburban Census tracts in and around the Atlanta metropolitan area, had below average poverty rates in 2000.

By 2009-2013, that picture had changed considerably. As shown in Map II.8 on page 35, poverty had become more widespread in the northern part of the state since 2000, even as the overall poverty rate in the state's non-entitlement areas grew by over four percentage points. Relatively high poverty rates persisted in those areas that were observed to hold high concentrations of residents living in poverty in 2000, including Statesboro and Dublin.

Map II.7
Poverty Rate by Census Tract, 2000
Non-Entitlement Areas of Georgia
2000 Census Data



Map II.8 Poverty Rate by Census Tract, 2009-2013 Non-Entitlement Areas of Georgia 2009-2013 ACS Data



HOUSING PROFILE

Simple counts of housing by age, type, tenure, and other characteristics form the basis for the housing stock background, suggesting the available housing in non-entitlement areas of the State 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 challenges such as incomplete plumbing and/or kitchen facilities. Review of housing costs reveals the markets in which housing consumers in the state can shop.

CHARACTERISTICS OF THE HOUSING STOCK

The number of housing units in the state's non-entitlement areas increased by 20.1 percent between the 2000 and 2010 Census counts, as shown in Table II.10 below, outpacing growth in the number of households. During that time, the percentage of housing units that were occupied decreased from 89.6 to 86.5, due largely to relatively slow growth in the number of owner-occupied units. These units declined as a percentage of occupied-housing units as a whole, while the percentage of renter-occupied units grew by just over two percentage points, and by 2010, around 28 percent of all occupied units were occupied by renters.

Table II.10
Housing Units by Tenure
 Non-Entitlement Areas of Georgia
 2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Non-Entitlement Areas of Georgia					
Occupied Housing Units	1,516,407	89.6%	1,756,463	86.5%	15.8%
Owner-Occupied	1,127,245	74.3%	1,266,728	72.1%	12.4%
Renter-Occupied	389,162	25.7%	489,735	27.9%	25.8%
Vacant Housing Units	175,319	10.4%	275,008	13.5%	56.9%
Total Housing Units	1,691,726	100.0%	2,031,471	100.0%	20.1%
Entitlement Areas of Georgia					
Occupied Housing Units	1,489,962	93.7%	1,829,121	88.9%	22.8%
Owner-Occupied	901,909	60.5%	1,087,674	59.5%	20.6%
Renter-Occupied	588,053	39.5%	741,447	40.5%	26.1%
Vacant Housing Units	100,049	6.3%	228,209	11.1%	128.1%
Total Housing Units	1,590,011	100.0%	2,057,330	100.0%	29.4%
State of Georgia					
Occupied Housing Units	3,006,369	91.6%	3,585,584	87.7%	19.3%
Owner-Occupied	2,029,154	67.5%	2,354,402	65.7%	16.0%
Renter-Occupied	977,215	32.5%	1,231,182	34.3%	26.0%
Vacant Housing Units	275,368	8.4%	503,217	12.3%	82.7%
Total Housing Units	3,281,737	100.0%	4,088,801	100.0%	24.6%

However, more pronounced growth was observed in the number of vacant units, which increased by 56.9 percent over the decade. These units, which had accounted for 10.4 percent of all housing units in 2000, came to represent 13.5 percent of the housing stock in the state's non-entitlement areas. Similar trends were observed in the state's entitlement areas, though the growth in the number of vacant housing units was considerably more pronounced: these units, which had occupied 6.3 percent of the entitlement housing stock in 2000, came to account for 11.1 percent by 2010.

Over 72 percent of housing units in the state's non-entitlement areas were occupied by their owners in 2010. As shown in Map II.9 on the following page, owner-occupied housing units accounted for an even larger percentage of all units in Census tracts in the Atlanta suburbs, as well as in Census tracts throughout the northern half of the state and in coastal tracts, particularly near Savannah.

By contrast, smaller percentages of housing units were occupied by their owners in inland, rural Census tracts in the southern part of the state, and correspondingly larger percentages of those housing units were occupied by rental tenants, as shown in Map II.10 on page 39. The largest concentrations of rental units in the state's non-entitlement areas tended to be located in and around towns and cities in the southern part of the state, notably in the military bases around Hinesville and Columbus, as well as in Census tracts near Statesboro and Macon.

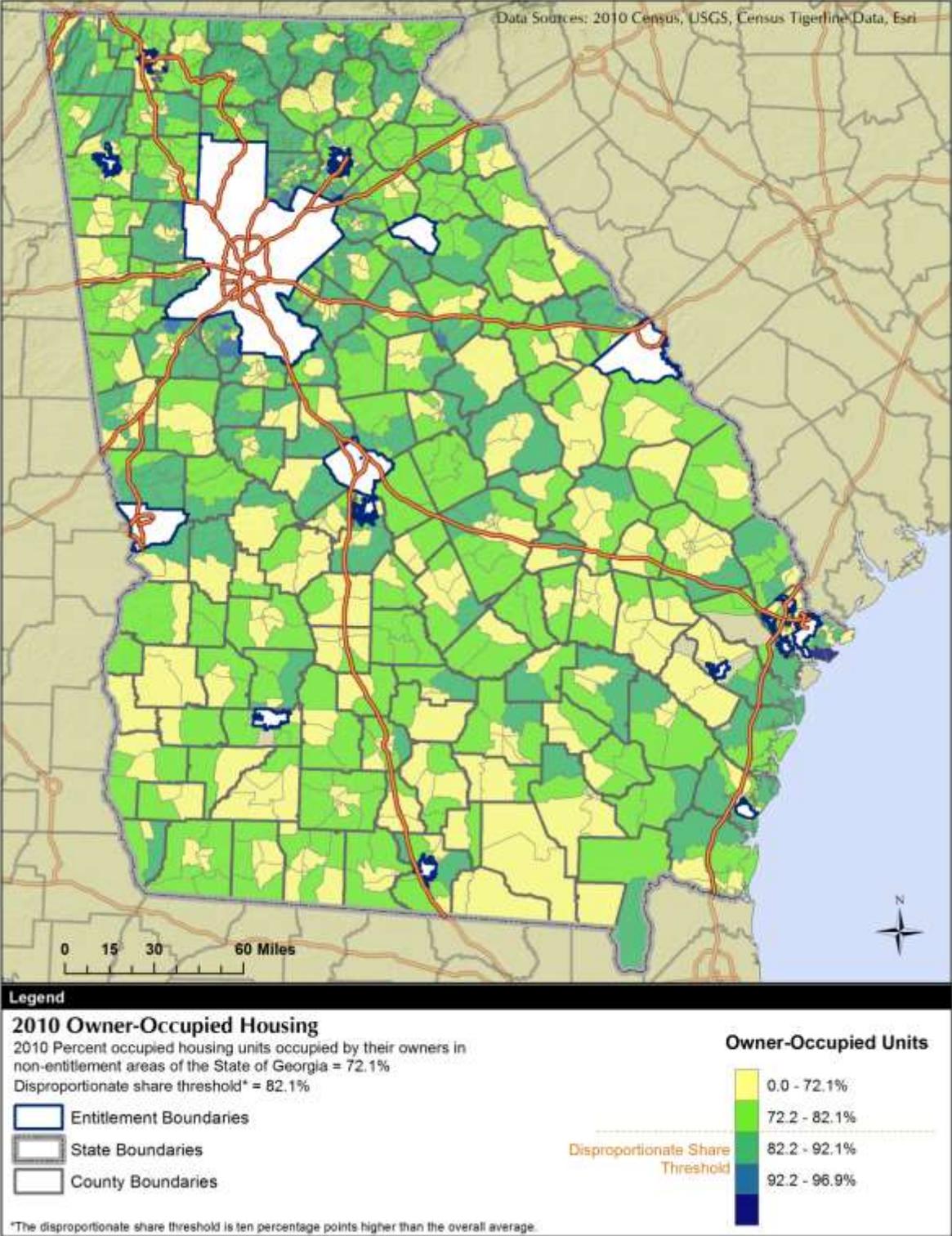
VACANT HOUSING

Housing units may be vacant for many reasons. As shown in Table II.11 below, much of the growth in vacant housing in the state's non-entitlement areas is attributable to an increase in the number of units available to the housing market, i.e., units available for sale and to rent. Together with homes dedicated to seasonal, recreational, or occasional use, these units represented around 65 percent of all vacant units in the state's non-entitlement areas in 2010, and 71 percent of entitlement vacancies.

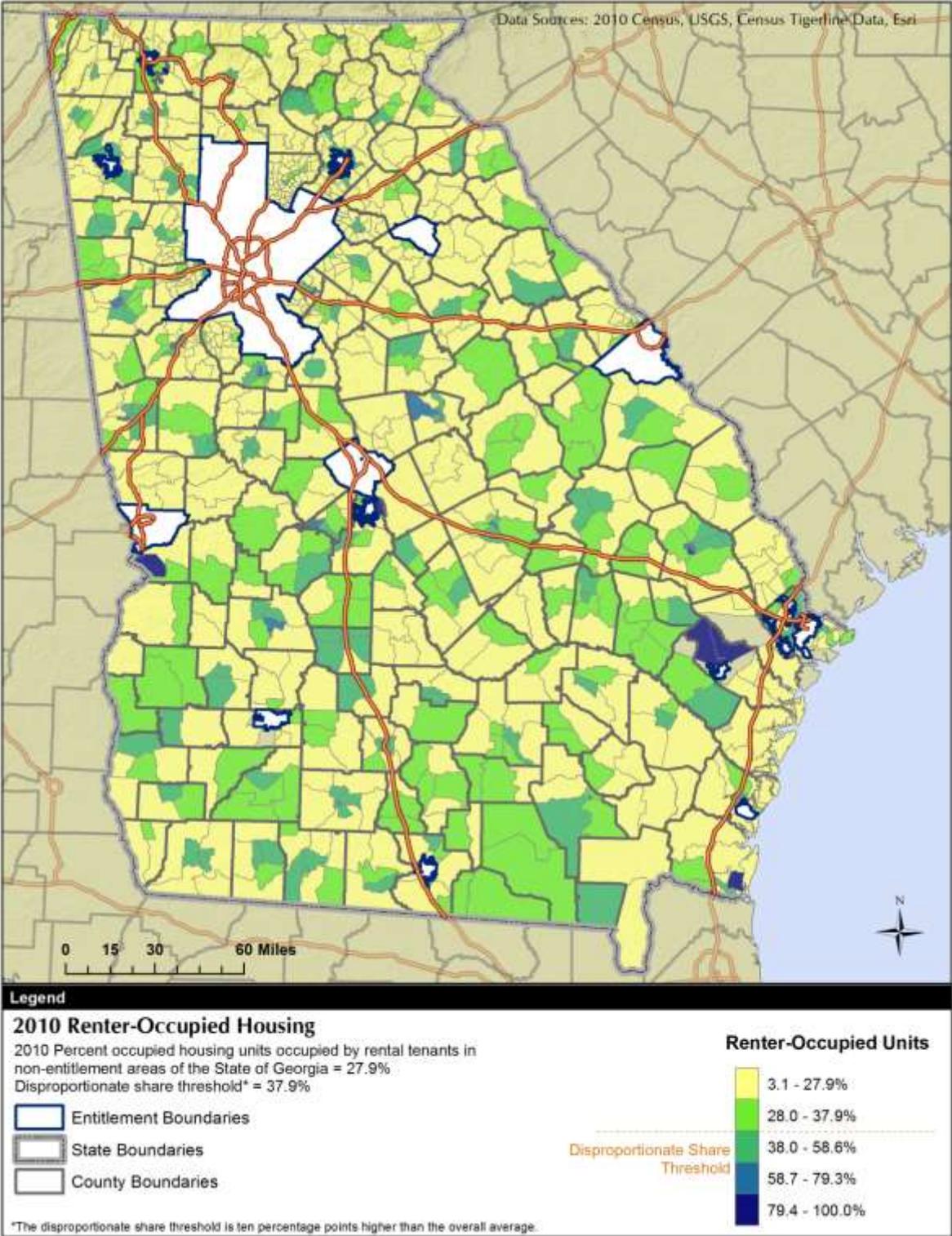
Table II.11
Disposition of Vacant Housing Units
Non-Entitlement Areas of Georgia
2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Non-Entitlement Areas of Georgia					
For Rent	42,001	24.0%	66,317	24.1%	57.9%
For Sale	21,026	12.0%	39,956	14.5%	90.0%
Rented or Sold, Not Occupied	12,891	7.4%	10,839	3.9%	-15.9%
For Seasonal, Recreational, or Occasional Use	44,963	25.6%	71,435	26.0%	58.9%
For Migrant Workers	810	0.5%	774	0.3%	-4.4%
Other Vacant	53,628	30.6%	85,687	31.2%	59.8%
Total	175,319	100.0%	275,008	100.0%	56.9%
Entitlement Areas of Georgia					
For Rent	44,904	44.9%	108,099	47.4%	140.7%
For Sale	17,414	17.4%	43,896	19.2%	152.1%
Rented or Sold, Not Occupied	7,462	7.5%	9,071	4.0%	21.6%
For Seasonal, Recreational, or Occasional Use	5,101	5.1%	10,076	4.4%	97.5%
For Migrant Workers	159	0.2%	80	0.0%	-49.7%
Other Vacant	25,009	25.0%	56,987	25.0%	127.9%
Total	100,049	100.0%	228,209	100.0%	128.1%
State of Georgia					
For Rent	86,905	31.6%	174,416	34.7%	100.7%
For Sale	38,440	14.0%	83,852	16.7%	118.1%
Rented or Sold, Not Occupied	20,353	7.4%	19,910	4.0%	-2.2%
For Seasonal, Recreational, or Occasional Use	50,064	18.2%	81,511	16.2%	62.8%
For Migrant Workers	969	0.4%	854	0.2%	-11.9%
Other Vacant	78,637	28.6%	142,674	28.4%	81.4%
Total	275,368	100.0%	503,217	100.0%	82.7%

Map II.9 Owner-Occupied Housing Units Non-Entitlement Areas of Georgia 2010 Census Data



Map II.10
Renter-Occupied Housing Units
Non-Entitlement Areas of Georgia
2010 Census Data

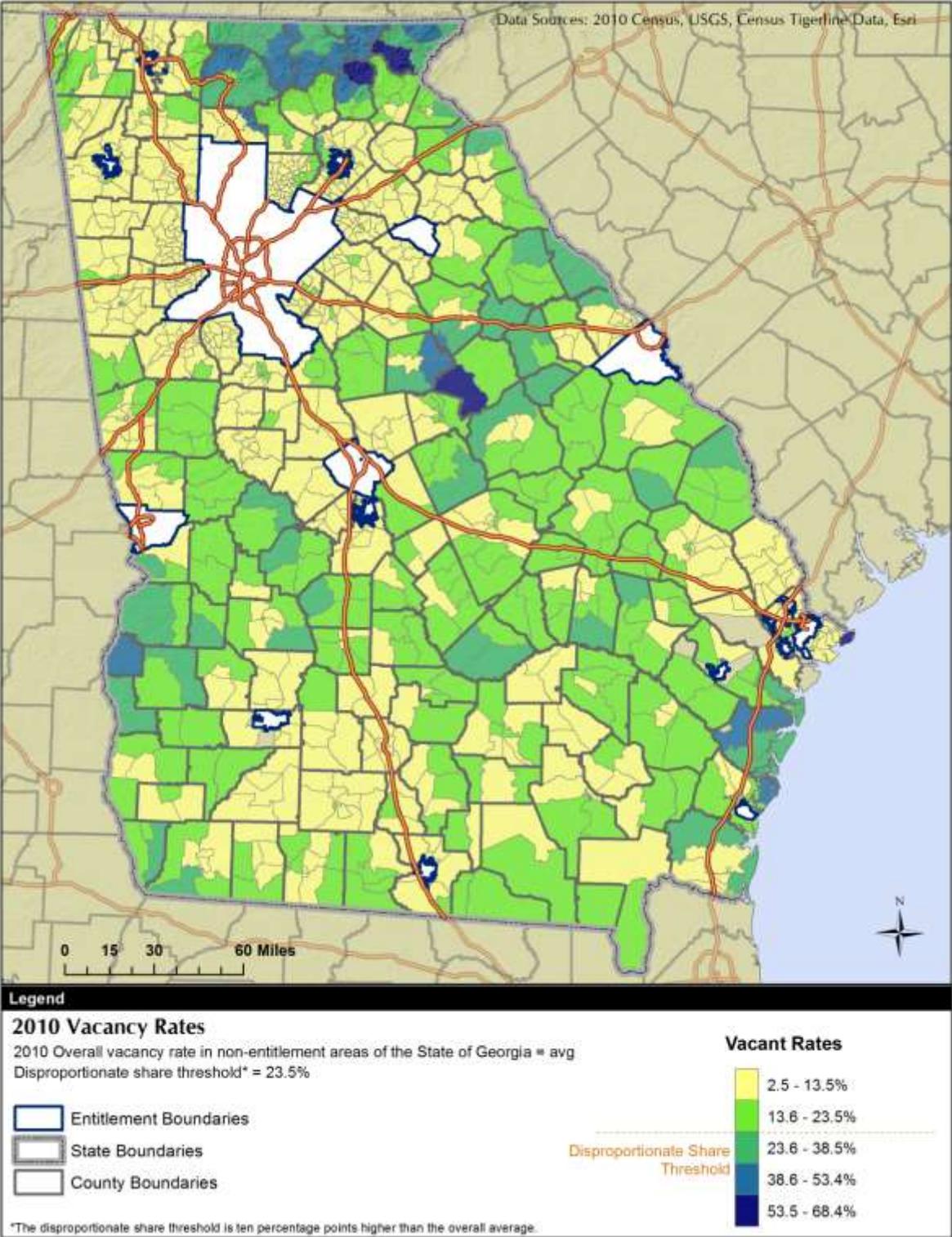


Unfortunately, nearly a third of the growth in the number of vacant housing units in non-entitlement areas was due to an increase in the number of “other vacant” units, which represented 31.2 percent of all vacant non-entitlement units in 2010. These units, which are not available to the market place, may represent a blighting influence where they are grouped in close geographic proximity. The number of “other vacant” units in the state’s entitlement areas grew by almost the same amount, but represented a smaller proportion of the overall growth in vacant units in those areas.

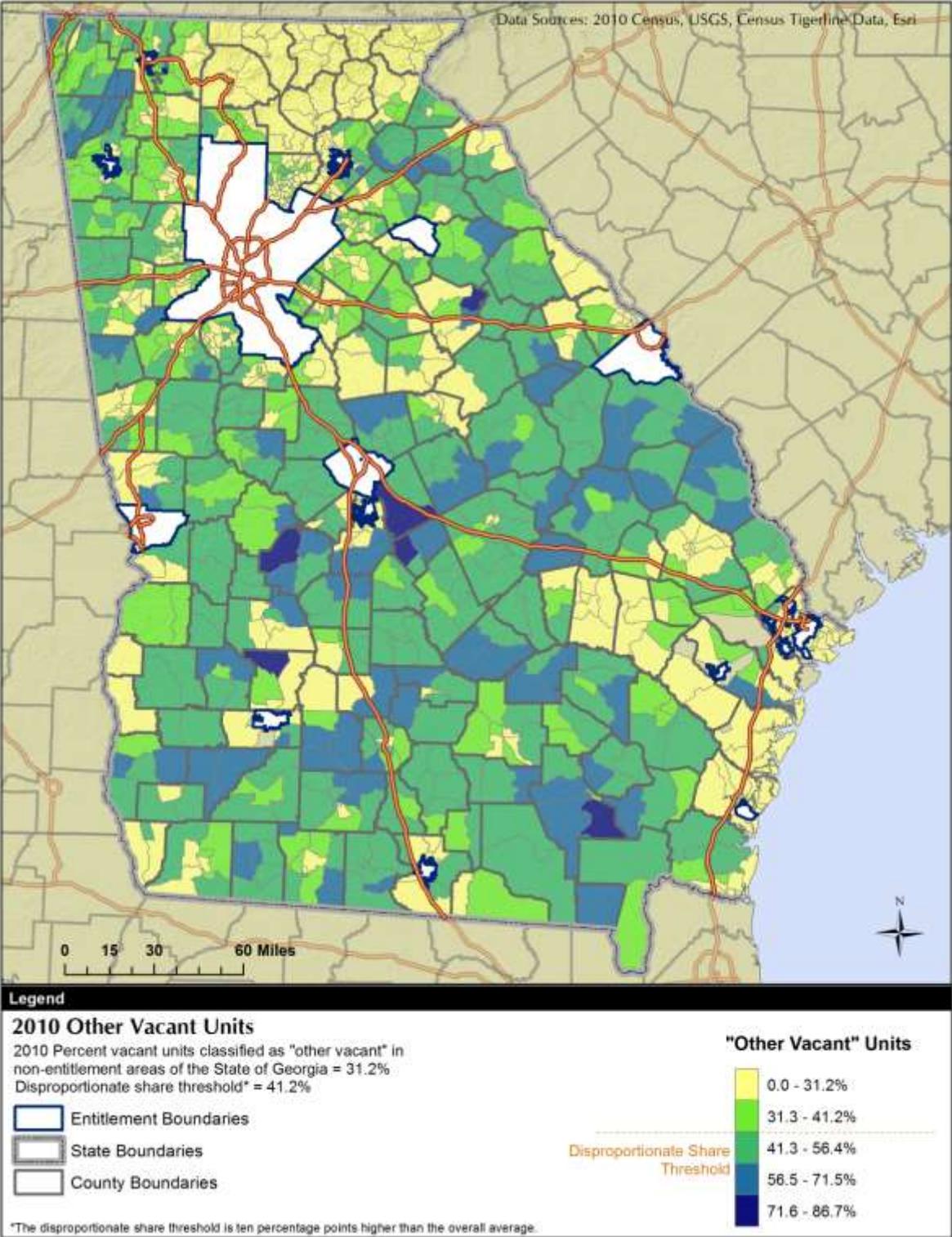
The highest concentrations of vacant housing units in the state in 2010 were observed in Census tracts near the state’s northern border, as well as in Census tracts to the east and southeast of Eatonton, where more than 38.5 percent of housing units were vacant. By comparison, vacancy rates were relatively low in most of the Census tracts surrounding the Atlanta metropolitan area, Savannah, and Macon, along with rural Census tracts in the south of the state. Vacancy rates throughout the state’s non-entitlement areas are presented in Map II.11 on the following page.

A relatively small percentage of housing units in the north of the state were classified as “other vacant”, as shown in Map II.12 on page 42. These units often present more of a challenge than other types of vacant units because they tend to fall into dilapidation, and may contribute to blight where they are grouped in close geographic proximity. Census tracts with high concentrations of “other vacant” units appeared throughout the south of the state, but accounted for smaller percentages of vacant units in tracts in and around the state’s entitlement jurisdictions.

Map II.11
Vacant Housing Units
Non-Entitlement Areas of Georgia
2010 Census Data



Map II.12 "Other Vacant" Housing Units Non-Entitlement Areas of Georgia 2010 Census Data



HOUSEHOLD SIZE

The number of households in the state's non-entitlement areas grew by around 240,000 between 2000 and 2010, to around 1.76 million, as shown in Table II.12 below. Around 63 percent of that growth was due to growth in the number of smaller households, or those with one or two members. Though there was pronounced growth, in relative terms, in the number of larger households (i.e., those containing six or more members), those households accounted for a small percentage of all households in both years, and their contribution to the growth in the number of households was relatively small. The average household size also appears to have declined in the state's entitlement areas, thanks again to marked growth in the number of smaller households.

Table II.12
Households by Household Size
 Non-Entitlement Areas of Georgia
 2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
Non-Entitlement Areas of Georgia					
One Person	325,549	21.5%	395,907	22.5%	21.6%
Two Persons	502,138	33.1%	584,888	33.3%	16.5%
Three Persons	288,993	19.1%	313,654	17.9%	8.5%
Four Persons	242,552	16.0%	262,266	14.9%	8.1%
Five Persons	101,903	6.7%	122,438	7.0%	20.2%
Six Persons	34,799	2.3%	47,494	2.7%	36.5%
Seven Persons or More	20,473	1.4%	29,816	1.7%	45.6%
Total	1,516,407	100.0%	1,756,463	100.0%	15.8%
Entitlement Areas of Georgia					
One Person	384,974	25.8%	513,567	28.1%	33.4%
Two Persons	461,644	31.0%	545,250	29.8%	18.1%
Three Persons	261,865	17.6%	307,240	16.8%	17.3%
Four Persons	218,087	14.6%	253,252	13.8%	16.1%
Five Persons	97,739	6.6%	121,637	6.7%	24.5%
Six Persons	37,712	2.5%	50,626	2.8%	34.2%
Seven Persons or More	27,941	1.9%	37,549	2.1%	34.4%
Total	1,489,962	100.0%	1,829,121	100.0%	22.8%
State of Georgia					
One Person	710,523	23.6%	909,474	25.4%	28.0%
Two Persons	963,782	32.1%	1,130,138	31.5%	17.3%
Three Persons	550,858	18.3%	620,894	17.3%	12.7%
Four Persons	460,639	15.3%	515,518	14.4%	11.9%
Five Persons	199,642	6.6%	244,075	6.8%	22.3%
Six Persons	72,511	2.4%	98,120	2.7%	35.3%
Seven Persons or More	48,414	1.6%	67,365	1.9%	39.1%
Total	3,006,369	100.0%	3,585,584	100.0%	19.3%

Around 90 percent of the housing units in the state's non-entitlement areas were single-family or mobile homes in 2000, as shown in Table II.13 on the following page. The same was true in 2009-2013; however, the percentage of single-family homes had increased considerably since 2000, from 68.8 to 73 percent, while the number and percentage of mobile homes had declined. The number and percentage of apartments also increased, and these units came to account for 5.5 percent of housing units in the state's non-entitlement areas in 2009-2013. Apartment units represented a considerably larger percentage of housing units in the state's entitlement areas, or nearly a quarter in 2009-2013.

Table II.13
Housing Units by Type
 Non-Entitlement Areas of Georgia
 2000 Census SF3 & 2013 Five-Year ACS Data

Unit Type	2000 Census		2013 Five-Year ACS	
	Units	% of Total	Units	% of Total
Non-Entitlement Areas of Georgia				
Single-Family	1,164,293	68.8%	1,481,479	73.0%
Duplex	42,844	2.5%	46,150	2.3%
Tri- or Four-Plex	43,657	2.6%	44,222	2.2%
Apartment	82,057	4.9%	111,813	5.5%
Mobile Home	354,777	21.0%	344,339	17.0%
Boat, RV, Van, Etc.	3,675	0.2%	1,775	0.1%
Total	1,691,303	100.0%	2,029,778	100.0%
Entitlement Areas of Georgia				
Single-Family	1,037,174	65.2%	1,389,129	67.3%
Duplex	47,526	3.0%	47,106	2.3%
Tri- or Four-Plex	88,878	5.6%	80,331	3.9%
Apartment	376,057	23.6%	509,482	24.7%
Mobile Home	40,161	2.5%	38,431	1.9%
Boat, RV, Van, Etc.	638	0.0%	555	0.0%
Total	1,590,434	100.0%	2,065,034	100.0%
State of Georgia				
Single-Family	2,201,467	67.1%	2,870,608	70.1%
Duplex	90,370	2.8%	93,256	2.3%
Tri- or Four-Plex	132,535	4.0%	124,553	3.0%
Apartment	458,114	14.0%	621,295	15.2%
Mobile Home	394,938	12.0%	382,770	9.3%
Boat, RV, Van, Etc.	4,313	0.1%	2,330	0.1%
Total	3,281,737	100.0%	4,094,812	100.0%

HOUSING ISSUES

While the overall 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 2009 to 2013 ACS averages.

Overcrowding was less common in 2009-2013 than it had been in 2000, when 2.6 percent of housing units were overcrowded, meaning that they included more than one resident per room and as many as 1.5 persons per room. As shown in Table II.14 on the following page, 1.3 percent of housing units were severely overcrowded in 2000, which means that there were more than 1.5 persons per room living in them. By 2009-2013, the number of housing units that showed any degree of overcrowding had fallen from 3.9 percent to 2.3 percent. A similar trend was observed in the state's entitlement areas, where overcrowding was marginally more prevalent. In both areas, rental housing units were more impacted by overcrowding and severe overcrowding than owner-occupied units.

Table II.14
Overcrowding and Severe Overcrowding
 Non-Entitlement Areas of Georgia
 2000 Census SF3 & 2013 Five-Year ACS Data

Data Source	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
Owner							
2000 Census	1,098,464	97.5%	20,663	1.8%	7,743	0.7%	1,126,870
2013 Five-Year ACS	1,217,989	98.7%	12,979	1.1%	3,639	0.3%	1,234,607
Renter							
2000 Census	358,380	92.1%	19,237	4.9%	11,542	3.0%	389,159
2013 Five-Year ACS	465,126	95.2%	17,009	3.5%	6,379	1.3%	488,514
Total							
2000 Census	1,456,844	96.1%	39,900	2.6%	19,285	1.3%	1,516,029
2013 Five-Year ACS	1,683,115	97.7%	29,988	1.7%	10,018	0.6%	1,723,121
Entitlement Areas of Georgia							
Owner							
2000 Census	881,114	97.6%	14,239	1.6%	7,070	0.8%	902,423
2013 Five-Year ACS	1,046,033	98.9%	9,618	0.9%	1,772	0.2%	1,057,423
Renter							
2000 Census	523,176	89.0%	34,335	5.8%	30,406	5.2%	587,917
2013 Five-Year ACS	702,345	95.2%	25,298	3.4%	9,910	1.3%	737,553
Total							
2000 Census	1,404,290	94.2%	48,574	3.3%	37,476	2.5%	1,490,340
2013 Five-Year ACS	1,748,378	97.4%	34,916	1.9%	11,682	0.7%	1,794,976
State of Georgia							
Owner							
2000 Census	1,979,578	97.6%	34,902	1.7%	14,813	0.7%	2,029,293
2013 Five-Year ACS	2,264,022	98.8%	22,597	1.0%	5,411	0.2%	2,292,030
Renter							
2000 Census	881,556	90.2%	53,572	5.5%	41,948	4.3%	977,076
2013 Five-Year ACS	1,167,471	95.2%	42,307	3.5%	16,289	1.3%	1,226,067
Total							
2000 Census	2,861,134	95.2%	88,474	2.9%	56,761	1.9%	3,006,369
2013 Five-Year ACS	3,431,493	97.5%	64,904	1.8%	21,700	0.6%	3,518,097

Incomplete plumbing or kitchen facilities are other indicators of potential housing challenges. 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. 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.

As shown in Table II.15 on the following page, the percentage of housing units with incomplete plumbing facilities decreased from 0.7 percent in 2000 to 0.5 percent by 2009-2013. In the state's entitlement areas, the percentage of units lacking complete plumbing facilities remained steady, at 0.5 percent, from 2000 through 2009-2013.

Table II.15
Households with Incomplete Plumbing Facilities
 Non-Entitlement Areas of Georgia
 2000 Census SF3 & 2013 Five-Year ACS Data

Households	2000 Census	2013 Five-Year ACS
Non-Entitlement Areas of Georgia		
With Complete Plumbing Facilities	1,506,086	1,714,970
Lacking Complete Plumbing Facilities	9,943	8,151
Total Households	1,516,029	1,723,121
Percent Lacking	0.70%	0.50%
Entitlement Areas of Georgia		
With Complete Plumbing Facilities	1,483,166	1,786,011
Lacking Complete Plumbing Facilities	7,174	8,965
Total Households	1,490,340	1,794,976
Percent Lacking	0.50%	0.50%
State of Georgia		
With Complete Plumbing Facilities	2,989,252	3,500,981
Lacking Complete Plumbing Facilities	17,117	17,116
Total Households	3,006,369	3,518,097
Percent Lacking	0.60%	0.50%

By contrast, the percentage of housing units with incomplete kitchen facilities rose during the same time period in entitlement and non-entitlement areas alike, as shown in Table II.16 below. However, these units accounted for less than one percent of housing units overall in both areas.

Table II.16
Households with Incomplete Kitchen Facilities
 Non-Entitlement Areas of Georgia
 2000 Census SF3 & 2013 Five-Year ACS Data

Households	2000 Census	2013 Five-Year ACS
Non-Entitlement Areas of Georgia		
With Complete Kitchen Facilities	1,507,810	1,710,897
Lacking Complete Kitchen Facilities	8,219	12,224
Total Households	1,516,029	1,723,121
Percent Lacking	0.5%	0.7%
Entitlement Areas of Georgia		
With Complete Kitchen Facilities	1,483,398	1,781,311
Lacking Complete Kitchen Facilities	6,942	13,665
Total Households	1,490,340	1,794,976
Percent Lacking	0.5%	0.8%
State of Georgia		
With Complete Kitchen Facilities	2,991,208	3,492,208
Lacking Complete Kitchen Facilities	15,161	25,889
Total Households	3,006,369	3,518,097
Percent Lacking	0.5%	0.7%

Households throughout the state’s non-entitlement areas were considerably more impacted by cost-burdening, as shown in Table II.17 on the following page. Households are considered to be cost-burdened when more than 30 percent, but less than 50 percent, of their monthly income goes toward housing costs, and severely cost-burdened when housing costs consume more than 50 percent of their income. Nearly 18 percent of households in the state’s non-entitlement areas were cost-burdened in 2009-2013, up from 14 percent in 2000. At the same time, the percentage of severely cost-burdened households grew from 9.8 to 14.2 percent. A similar trend was observed in the state’s entitlement areas, though households in those areas

were, on aggregate, more heavily impacted by cost-burdening. Rental households were also more heavily impacted than owner-occupied households in both areas.

Table II.17
Cost Burden and Severe Cost Burden by Tenure

Non-Entitlement Areas of Georgia
2000 Census & 2013 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	
Non-Entitlement Areas of Georgia									
Owner With a Mortgage									
2000 Census	404,112	75.1%	84,236	15.7%	46,483	8.6%	2,928	0.5%	537,759
2013 Five-Year ACS	511,230	65.2%	159,647	20.4%	107,409	13.7%	6,023	0.8%	784,309
Owner Without a Mortgage									
2000 Census	212,975	87.7%	14,833	6.1%	9,961	4.1%	5,209	2.1%	242,978
2013 Five-Year ACS	381,917	84.8%	35,765	7.9%	24,636	5.5%	7,980	1.8%	450,298
Renter									
2000 Census	206,455	54.6%	63,112	16.7%	57,285	15.1%	51,540	13.6%	378,392
2013 Five-Year ACS	200,459	41.0%	108,523	22.2%	111,991	22.9%	67,541	13.8%	488,514
Total									
2000 Census	823,542	71.0%	162,181	14.0%	113,729	9.8%	59,677	5.1%	1,159,129
2013 Five-Year ACS	1,093,606	63.5%	303,935	17.6%	244,036	14.2%	81,544	4.7%	1,723,121
Entitlement Areas of Georgia									
Owner With a Mortgage									
2000 Census	495,660	74.7%	107,911	16.3%	57,085	8.6%	3,154	0.5%	663,810
2013 Five-Year ACS	521,555	63.8%	165,406	20.2%	123,522	15.1%	6,427	0.8%	816,910
Owner Without a Mortgage									
2000 Census	134,713	88.7%	8,422	5.5%	5,950	3.9%	2,776	1.8%	151,861
2013 Five-Year ACS	204,297	84.9%	18,534	7.7%	14,060	5.8%	3,622	1.5%	240,513
Renter									
2000 Census	333,358	56.9%	119,450	20.4%	101,637	17.3%	31,609	5.4%	586,054
2013 Five-Year ACS	316,100	42.9%	179,431	24.3%	193,539	26.2%	48,483	6.6%	737,553
Total									
2000 Census	963,731	68.8%	235,783	16.8%	164,672	11.7%	37,539	2.7%	1,401,725
2013 Five-Year ACS	1,041,952	58.0%	363,371	20.2%	331,121	18.4%	58,532	3.3%	1,794,976
State of Georgia									
Owner With a Mortgage									
2000 Census	899,772	74.9%	192,147	16.0%	103,568	8.6%	6,082	0.5%	1,201,569
2013 Five-Year ACS	1,032,785	64.5%	325,053	20.3%	230,931	14.4%	12,450	0.8%	1,601,219
Owner Without a Mortgage									
2000 Census	347,688	88.1%	23,255	5.9%	15,911	4.0%	7,985	2.0%	394,839
2013 Five-Year ACS	586,214	84.9%	54,299	7.9%	38,696	5.6%	11,602	1.7%	690,811
Renter									
2000 Census	539,813	56.0%	182,562	18.9%	158,922	16.5%	83,149	8.6%	964,446
2013 Five-Year ACS	516,559	42.1%	287,954	23.5%	305,530	24.9%	116,024	9.5%	1,226,067
Total									
2000 Census	1,787,273	69.8%	397,964	15.5%	278,401	10.9%	97,216	3.8%	2,560,854
2013 Five-Year ACS	2,135,558	60.7%	667,306	19.0%	575,157	16.3%	140,076	4.0%	3,518,097

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 rent and 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 dilapidation and blight. All three of these situations should be of concern to policymakers and program managers.

HOUSING COSTS

Housing costs in the state's non-entitlement areas tended to be higher in the northern part of the state, as well as in coastal Census tracts. As shown in Map II.13 on the following page, median home values were almost uniformly above the statewide median around the Atlanta metropolitan area, and in Census tracts to the north and northeast of Atlanta. The same was largely true of median contract rent prices as shown in Map II.14 on page 50. Home values tended to be relatively low in rural Census tracts throughout the southern part of the state.

SUMMARY

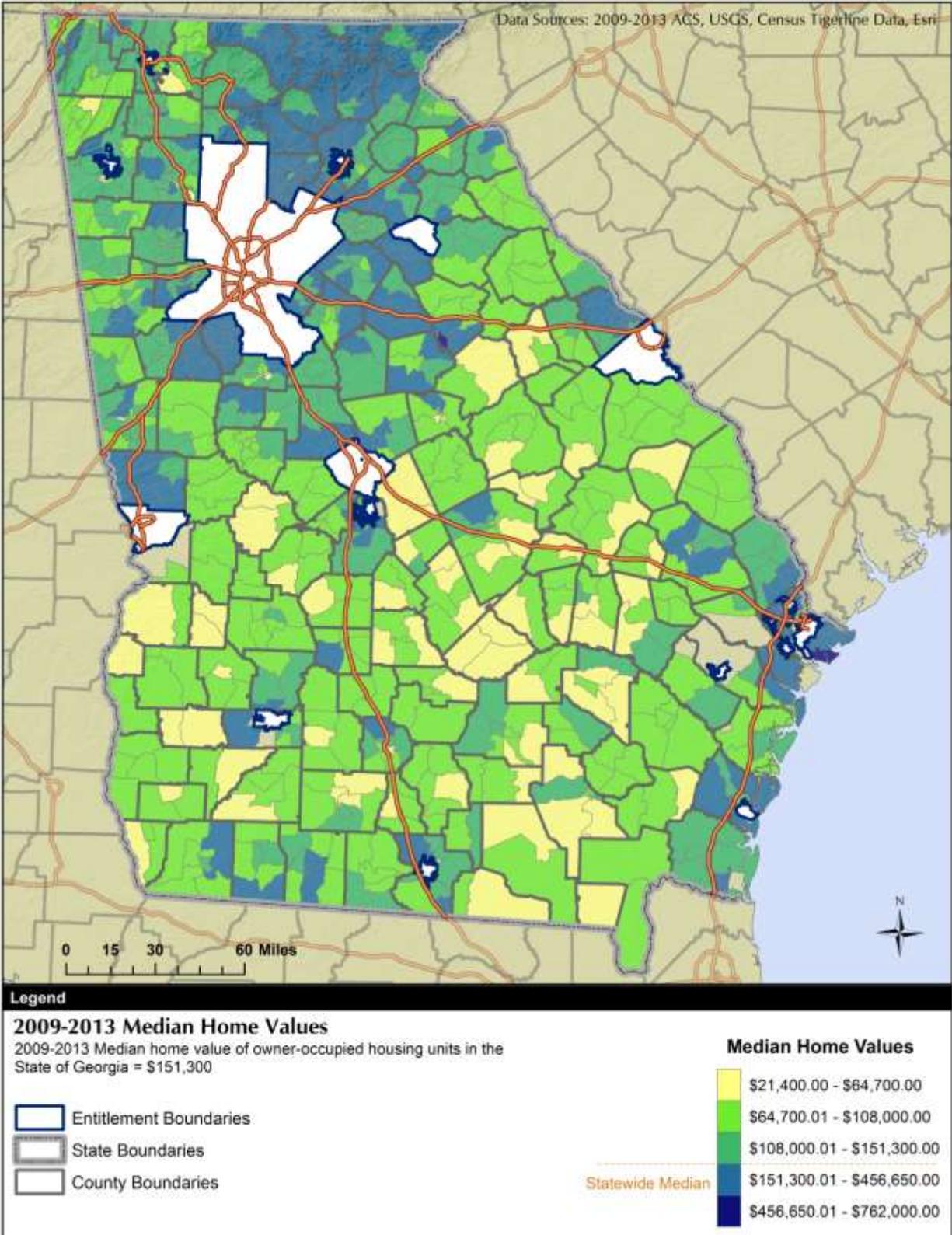
The population of Georgia's non-entitlement areas has grown by an estimated 16.7 percent since 2000. Much of the population growth in the state's non-entitlement areas between 2000 and 2010 was attributable to substantial growth in the number of residents aged 55 to 64 and those aged 65 and older; the same was true of the state's entitlement areas. The number of residents in that age cohort has continued to grow at a rate that was faster than the population average since 2010.

A majority of residents in Georgia's non-entitlement areas in 2000 and 2010 were white; however, the white population decreased in relation to the overall non-entitlement population during that time, from 74.6 to 72 percent, largely due to considerable growth in the percentage of residents who identified their race as "other". The population of black residents remained around 21.5 percent during the same time period. In terms of ethnicity, non-Hispanic residents accounted for a majority of residents in 2000 and 2010. Nevertheless, the population of Hispanic residents increased from 3.6 to 6.4 percent in non-entitlement areas in the intervening years.

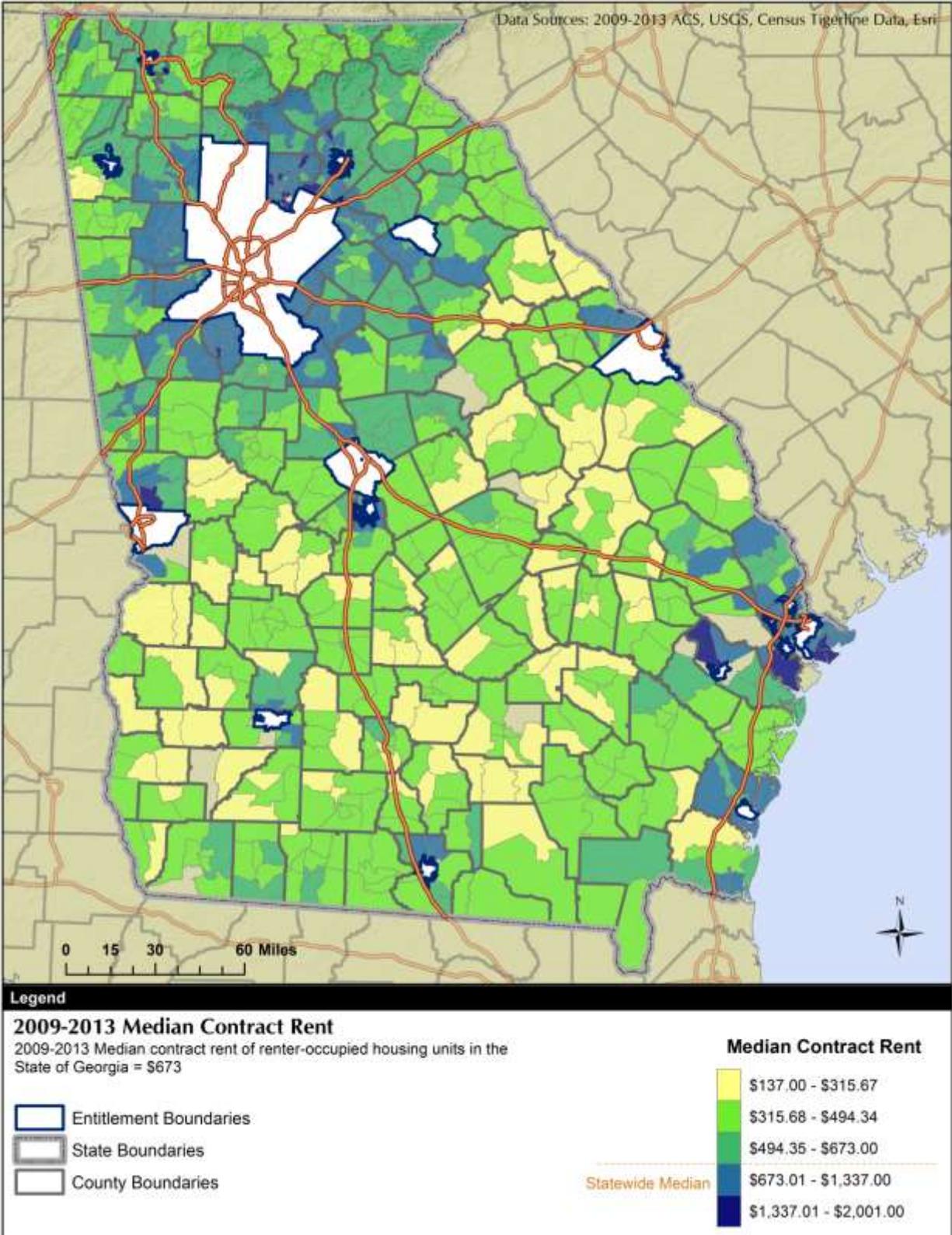
Similar trends were observed in the state's entitlement areas during that time, though these trends were in some cases more pronounced. The white population decreased from 55.2 to 47.6 percent of the total population and the Hispanic population increased from 7.1 to 11.2 percent of the total population. Unlike in the state's non-entitlement areas, where the population of black residents remained approximately the same in relation to the overall population, the percentage of black residents increased by over three points in the state's entitlement areas. By 2010, nearly forty percent of the state's entitlement population was black.

As the population continued to grow after 2010, the percentage of black, white, and Hispanic residents all increased as the number of residents who identified their race as "other" decreased by around one percentage point of the non-entitlement population. In the state's entitlement areas, the population of black residents remained the same in relation to the entitlement population, while white residents increased from 47.6 to 48.7 percent of the total entitlement population.

Map II.13
Median Home Values
Non-Entitlement Areas of Georgia
2009-2013 ACS Data



Map II.14
Median Contract Rent
Non-Entitlement Areas of Georgia
2009-2013 ACS Data



Black residents of the state's non-entitlement areas accounted for relatively large percentages of the population in Census tracts throughout the center of the state, including Census tracts in and around Dublin, Albany, Warner Robins, and Hinesville, along with large rural tracts near Greensboro. These same areas saw high concentrations of black residents in 2010, though black residents had also come to account for a relatively large percentage of the population in Census tracts surrounding the Atlanta metropolitan area. Hispanic residents tended to be concentrated in rural Census tracts surrounding urban areas in the north of the state, as well as in large rural Census tracts in the south of the state.

Over a fifth of the state's non-entitlement residents were living with some sort of disability in 2000, though this figure was slightly higher in the state's non-entitlement areas, at 21.6 percent. The overall disability rate was 11.9 percent in 2009-2013, according to American Community Survey estimates from those years. Note that this does not necessarily represent a true decline in the population with disabilities, as the definition of "disability" in ACS estimates after 2008 is substantively different from the one employed previously. However, as was the case in 2000, the disability rate in the state's non-entitlement areas was higher than in the entitlement areas.

Prior to 2007, the state's labor force had enjoyed nearly two decades of uninterrupted growth. The same was true of the total number of employed persons, which grew from approximately 1.55 million in 1990 to 2.26 million by 2007. The unemployment rate was generally below five percent during that time period. However, growth in the number of employed, which had already showed signs of slowing by 2007, ended abruptly the following year when the number of employed decreased by around 20,000. The decline in employment accelerated the following year, and by 2010 the number of employed had fallen by nearly 150,000. Meanwhile, growth in the labor force continued through 2008, and though it decreased in 2009, this decline was slight compared to the decline in the number of employed. As the gap between the number of employed and the number of workers in the labor force grew, the unemployment rate rose above ten percent in the state's entitlement and non-entitlement areas. That unemployment rate has fallen to just over 8 percent since that time due to modest growth in the number of employed coupled with a slight, but steady, decline in the labor force.

Even as strong growth in employment and the number of jobs in the state continued after 2000, growth in the amount that the average worker earned at those jobs was beginning to slow considerably, as measured in real 2014 dollars. Previously strong growth in earnings had come to a halt by 2004, levelling off at around \$52,000 per year, after which real earnings per job declined steadily through 2011. Average incomes in the state, by contrast, did not begin to decline until after 2007. By 2010, the income of the average state resident, which stood at just under \$39,000 per year in 2007, had fallen by over \$2,700. Incomes and earnings have both shown signs of recovery since 2010, though recovery in incomes has been slower at the state than at the national level.

Between 2000 and 2013, higher income households came to account for larger and larger percentages of households in the state's entitlement and non-entitlement areas. At the same time, the percentage of households in income brackets below \$75,000 per year generally declined, with one exception: in the state's entitlement areas, the percentage of households with a combined income of less than \$15,000 per year grew from 13.5 to 13.7 percent.

Even as larger percentages of households were moving into higher income brackets, the percentage of households living in poverty was growing. This was particularly pronounced in the state's entitlement areas, where the poverty rate grew by 6 percentage points from 2000 through 2009-13. Though the poverty rate in the state's non-entitlement areas grew by 4.4 percentage points over the same time period, both areas had similar levels of poverty in 2009-2013: just over 18 percent. Geographically, poverty in the state's non-entitlement areas tended to be more concentrated in large rural tracts away from the state's major urban areas. However, the highest poverty rates in the state were observed in Census tracts in and around Statesboro and Dublin.

In entitlement and non-entitlement areas alike, the state experienced a modest shift away from homeownership and toward rental tenancy from 2000 through 2010. In non-entitlement areas, the percentage of owner-occupied units decreased from 74.3 to 72.1 percent. In the state's entitlement areas, which had higher rates of rental occupancy to begin with, the percentage of owner-occupied units decreased by one point.

Overall, the number of housing units in the state grew more rapidly than the number of households between 2000 and 2010. As a result, a larger percentage of housing units lay vacant at the end of the decade. In the state's non-entitlement areas, 13.5 percent of housing units were vacant in 2010. In the state's entitlement areas, 11.1 percent of units were vacant. The number of units that were sold but unoccupied decreased considerably in both areas, while the number of units available to buy or rent grew. The number of "other vacant" units also grew, though this growth was comparatively modest. "Other vacant" units typically present more of a challenge than other types of vacant units, because they are often not available to the market place. These units may fall into dilapidation and represent a blighting influence where they are grouped in close proximity.

Single-family housing units came to represent a larger percentage of the housing stock in the state's entitlement and non-entitlement areas after 2000, as did apartment units. At the same time, mobile homes declined considerably in number as a percentage of the housing stock. The number of duplexes, triplexes, and four-plexes grew in the state's non-entitlement areas, though at a relatively slow pace. As a result, these units accounted for a smaller percentage of the housing stock in the state's non-entitlement areas. The same was true in the state's entitlement areas, though in this case declining percentages of multi-plex units reflected an actual decline rather than just slow growth.

The size of the average household appears to have remained roughly the same between 2000 and 2010, though the number of households with seven members or more grew at an above-average pace during that time. In spite of that growth, overcrowded housing units were less common in 2009-2013 than they had been in 2000. Housing units are considered to be overcrowded to some degree when they include more than one resident per room: such units accounted for roughly 2.3 percent of all non-entitlement housing units in 2009-2013, and 2.6 percent of entitlement units.

Fewer households lacked complete plumbing or kitchen facilities in 2009-2013: less than one percent in both cases. A more common housing challenge was cost-burdening. Approximately 17.6 percent of non-entitlement households found themselves paying 31 to 50 percent of their income in housing costs in 2009-2013: these units are considered to be cost-burdened.

Housing costs consumed more than fifty percent of households' incomes in an additional 14.2 percent of non-entitlement households: these households are considered to be severely cost-burdened. The incidence of cost-burdening was even higher in the state's entitlement areas, and renters were more heavily impacted than homeowners in both areas.

Housing costs, both in the form of contract rental prices and home values, tended to be higher in the north of the state, around the Atlanta metropolitan area, as well as in the state's coastal Census tracts.

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).¹¹

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, 1991.¹²

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.

¹¹ "HUD Fair Housing Laws and Presidential Executive Orders."

http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/FHLaws

¹² "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.¹³

In sum, the federal Fair Housing Act (FHA) is the foundation for a suite of laws at the national level that are designed to protect residents of the United States from discrimination in the housing market. As originally passed in 1968, the Act prohibited discrimination on the basis of race, color, religion, gender, and national origin. Subsequent amendments passed in 1988 added additional protections on the basis of disability and familial status, and strengthened the enforcement provisions of the Act. Additional laws passed from 1964 to the present have generally broadened the protections guaranteed under the FHA, applying stricter and more comprehensive protections to housing providers who benefit from federal funding.

STATE AND LOCAL FAIR HOUSING LAWS

In addition to these federal laws, Georgia residents are protected from discrimination in the housing market by laws at the state level (Georgia Fair Housing Law (O.C.G.A. §8-3-200, *et seq.*)). The protected classes recognized by state law are the same as those recognized in the federal Fair Housing Act, and §8-3-220 explicitly precludes the expansion of fair housing rights by local jurisdictions beyond what is provided for in state law. HUD has determined that the Georgia Fair Housing Law is “substantially equivalent” to the federal Fair Housing Act, meaning that the rights and remedies that the state law provides are equivalent to those provided in the federal law, which allows for HUD-subsidized, state-level enforcement of fair housing law through the Fair Housing Assistance Program (FHAP). The Georgia Commission on Equal Opportunity (GCEO) formerly served state residents in that capacity: however, the GCEO ceased to participate in the FHAP in 2012, and is currently working to recertify as a FHAP agency.

FAIR HOUSING IN THE UNITED STATES

THE FIRST FORTY YEARS OF THE FAIR HOUSING ACT

The Fair Housing Act of 1968 was a product of the tumultuous time in which it was passed. Coming near the end of a decade marked by concerted and often violent struggles for civil rights, it was a profound statement of a nation’s commitment, despite considerable reluctance in many quarters, to work toward the end of segregation by race, color, religion, sex, and national origin. It was also, upon its passage, a relatively weak law. Indeed, it was only after

¹³“HUD Fair Housing Laws and Presidential Executive Orders.”

the enforcement provisions of the Act were considerably blunted that it was able to secure enough support to ensure its passage.¹⁴

Due in part to the weakening of those enforcement provisions, the Act was initially of only limited effectiveness in eradicating residential segregation, one of the policy goals that motivated passage of the law. According to one analyst, the first two decades of the Fair Housing Act constitute a “lost opportunity in terms of race relations in the United States¹⁵”. Nevertheless, the period following the passage of the Act was marked by a “minority rights revolution¹⁶”, whose germinal moment was the movement for civil rights for black Americans. The civil rights movement had a limited impact on residential segregation, however, which has persisted since 1968 due in part to persistent discrimination in the housing market¹⁷¹⁸

However, the cultural shifts of the late twentieth century helped to pave the way for passage of the Fair Housing Amendments Act of 1988, which broadened the enforcement provisions of the Act, gave increased authority to the US Department of Housing and Urban Development (HUD) to administer and enforce fair housing law, and increased the penalties to those who violated the act.¹⁹ In addition, reflecting the impact of advocacy on behalf of those with disabilities as well as marked changes to the traditional family structure over the previous two decades²⁰, the 1988 law added new protections based on “handicap” and “familial status.”

The ten years following the passage of the 1988 amendments saw an increase in the number of fair housing complaints filed with HUD, as well as an evolution in housing discrimination to a form that was, in the estimation of former HUD Secretary Andrew Cuomo, “more sophisticated, less obvious, but more insidious.”²¹ An example of such segregation was to be found, according to a 1999 HUD study, in the home lending market. That study, which was based on the results of paired testing of home mortgage lenders in selected cities, concluded that minority applicants were given less time with loan officers than non-minority applicants, received less information on prospective loan products, and were quoted higher interests rates in most of the cities included in the study. This differential treatment occurred in spite of the fact that the paired testers represented themselves as being similarly situated with respect to credit history and other relevant characteristics.²²

It was not clear in the late 1990s whether HUD’s increasing fair housing case load was the result of increasing segregation or growth in the number of US residents taking advantage of newly expanded fair housing enforcement measures. To help answer this question, HUD conducted a massive three-part study of discrimination in metropolitan housing markets,

¹⁴ Denton, Nancy A. *Half Empty or Half Full: Segregation and Segregated Neighborhoods 30 Years After the Fair Housing Act*. Cityscape: A Journal of Policy Development and Research, 1999. Vol. 4, No. 3. P. 111.

¹⁵ *Ibid.*

¹⁶ Skrentny 2002. *The Minority Rights Revolution*. Harvard University Press, 2004.

¹⁷ Denton 1999.

¹⁸ Yinger, John. *Measuring Racial Discrimination with Fair Housing Audits: Caught in the Act*. The American Economic Review, Vol. 76, No. 5: 1986. P. 881. This study, based on the results of paired fair housing tests in the city of Boston, concluded that housing agents, in “[catering] to the prejudices of current or potential white customers”, told black housing seekers about 30 percent fewer available housing units. A similar methodology was employed in a 2012, which demonstrated the persistence of this form of discrimination (See “Housing Discrimination Against Racial and Ethnic Minorities 2012,” published by the US Department of Housing and Urban Development).

¹⁹ Denton 1999.

²⁰ Marsden 2008

²¹ Janofsky, Michael. “HUD Plans Nationwide Inquiry on Housing Bias.” *The New York Times*, 17 November 1998.

²² Turner, Margery A. et al. “What We Know About Mortgage Lending Discrimination in America”. The Urban Institute. September 1999.

publishing the results of the first phase in 2000. In the course of the study HUD, once again availing itself of the paired testing employed in earlier studies, demonstrated the persistence of housing discrimination on the basis of race and ethnicity and its continuation into the twenty-first century. As in the 1999 study in mortgage lending, the HUD report revealed that minority housing seekers were, on average, shown fewer units and given fewer housing options than their majority counterparts, even when their financial circumstances were similar.²³ These findings were reinforced by a study conducted jointly by the University of Southern California and Oregon State University on the Los Angeles County housing market in 2006.²⁴

A CHANGING FAIR HOUSING LANDSCAPE

NATIONAL FAIR HOUSING CASES

As noted in the introduction to this report, provisions to affirmatively further fair housing (AFFH) 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 racial and socio-economic impacts of their projects.²⁵ 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.²⁶ 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 affirmatively furthering fair housing. The lawsuit was filed in 2007 by the Anti-Discrimination Center (ADC), a New York-based non-profit organization, under the False Claims Act. According to the ADC, the County "failed to consider race-based impediments to fair housing choice; failed to identify and take steps to overcome impediments; and failed to meet its obligations to maintain records concerning its efforts."

In a summary judgment in February 2009, a judge ruled that the County had made "false certifications on seven annual AFFH certifications and on more than a thousand implied certifications of compliance when it requested a drawdown of HUD funds". Pursuant to a settlement agreement brokered by the Obama Administration in April 2009, Westchester County was required 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

²³ *The Housing Discrimination Study*. Department of Housing and Urban Development. (HDS 2000).

²⁴ Carpusor, Adrian and William Loges. "Rental Discrimination and Ethnicity in Names." *Journal of Applied Social Psychology* 36(4).

²⁵ U.S. HUD. *39 Steps Toward Fair Housing*. <http://www.hud.gov/offices/theo/39steps.pdf>

²⁶ Orfield, Myron. "Racial Integration and Community Revitalization: Applying the Fair Housing Act to the Low Income Housing Tax Credit." *Vanderbilt Law Review*, November 2005.

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))”.²⁷

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 in 2011. As of April 2013, HUD’s decision had been upheld through several rounds of appeals by the County²⁸. The case is likely to have ramifications for 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. The case also signals an increased willingness on the part of HUD to bring enforcement pressure to bear in order to insure that state and local jurisdictions comply with the AFFH requirements.

Affirmatively Furthering Fair Housing

At the same time that HUD has pursued a more active role in fair housing enforcement, the agency has sought to bring additional guidance and clarity to fair housing policy. This effort was inspired in part by the agency’s own assessment of shortcomings in current policy and in part by criticism from other agencies; notably the Government Accountability Office (GAO).²⁹

In 2009, HUD noted that many of the AIs it reviewed as part of an internal study did not conform to the agency’s guidelines. This finding was reaffirmed in a 2010 study conducted by the GAO, which sought to assess the effectiveness of Analyses of Impediments as a tool to affirmatively further fair housing, as well as their effectiveness as planning documents. According to the GAO, an estimated 29 percent of CDBG and HOME grantees’ AIs had been prepared in 2004 or earlier, and were therefore likely to be of limited usefulness in current planning efforts. Furthermore, the GAO found that those AIs that were up to date largely lacked features that would render them effective as planning documents, including timetables and the signatures of top elected officials. More generally, the GAO noted that HUD guidelines concerning AIs are unclear, and that its requirements for the analyses are minimal³⁰. Under those requirements, the agency observed, grantees are “not required through regulation to update their AIs periodically, include certain information, follow a specific format in preparing AIs, or submit them to HUD for review³¹.”

The conclusion of the GAO study is reflected in its title: *HUD Needs to Enhance Its Requirements and Oversight of Jurisdictions’ Fair Housing Plans*. In response to the criticism of the GAO, as well as a longstanding recognition on the part of HUD that fair housing policy stood in need of improvement and clarification, the agency developed and published a proposed rule entitled *Affirmatively Furthering Fair Housing* in July of 2013. The proposed rule represents a substantial restructuring of the AFFH process, eliminating the AI and replacing it with the Assessment of Fair Housing (AFH). According to the rule, the AFH will (1) incorporate key demographic and economic metrics specifically identified by HUD, (2) be completed with

²⁷ <http://www.hud.gov/content/releases/settlement-westchester.pdf>

²⁸ *United States v Westchester County* 712 F.3d 761 2013 U.S. App.

²⁹ 24 CFR §5, 91, 92, et al. (2013)(Proposed Rule)

³⁰ “HUD Needs to Enhance Its Requirements and Oversight of Jurisdictions’ Fair Housing Plans”. *Government Accountability Office*. September 2010.

³¹ *Ibid.*, page 32.

nationally uniform data provided by HUD, and (3) be submitted to HUD for review in advance of the consolidated plan to insure that the findings of the fair housing analysis are fully integrated into the consolidated planning process.³² The comment period for the proposed rule ended in September of 2013. The final rule was announced on July 8, 2015 and published on July 16, 2015.

Note that because the new requirements set forth in the rule will not take effect immediately, the current AI effort is being undertaken in conformance with HUD guidance that is currently in place, as articulated in the Fair Housing Planning Guide, subsequent memoranda, and as required by the AFFH rule itself.³³

Discriminatory Effects and the Fair Housing Act

Prior to publishing the proposed AFFH rule, HUD finalized a rule in February 2013 that was intended to “formalize HUD’s long-held interpretation of the availability of ‘discriminatory effects’ liability under the Fair Housing Act³⁴.” According to HUD, individuals and businesses may be held liable for policies and actions that are neutral on their face but have a discriminatory effect on housing choice. This theory of liability had not yet been articulated by the signing of the Civil Rights Acts of 1964 or 1968; however, it has been an important test for discrimination in employment since the Supreme Court found in 1971³⁵ that the Civil Rights Act “proscribes not only overt discrimination but also practices that are fair in form, but discriminatory in operation³⁶.”

The first test of “disparate impact theory” in housing law came in 1974, with *United States v. City of Black Jack*³⁷. In that case, the government alleged that the City of Black Jack had “exercised its zoning powers to exclude... a federally-subsidized housing development”, thereby excluding residents of low-income housing, who were disproportionately black.³⁸ In deciding the matter, the Eight Circuit Court maintained that a plaintiff “need prove no more than that the conduct of the defendant actually or predictably results in racial discrimination” to make a case that the conduct is itself discriminatory³⁹. The theory of discriminatory effect established in this case has been consistently applied in fair housing cases and upheld in numerous district court decisions.⁴⁰

However, disparate impact theory was to face a considerable legal challenge in early 2015 in the case of *Texas Department of Housing and Community Affairs v. The Inclusive Communities Project*. In this case, the Supreme Court of the United States was asked to finally settle the question of whether or not housing providers and policy makers could be held liable not just for intentional discrimination, but for the effects of neutral policies that produce discriminatory outcomes.

³² 24 CFR §5, 91, 92, et al. (2013)(Proposed Rule)

³³ 24 CFR §154 (a)(3)(2015)

³⁴ 24 CFR §100 (2013)

³⁵ Garrow, David J. “Toward a Definitive History of *Griggs v. Duke Power Company*”. 67 Vand. L. Rev. 197 (2014).

³⁶ *Griggs v. Duke Power Co.*, 401 U.S. 430 (1971).

³⁷ Rich, Joseph D. “HUD’s New Discriminatory Effects Regulation: Adding Strength and Clarity to Efforts to End Residential Segregation.” Lawyers’ Committee for Civil Rights Under Law. May 2013.

³⁸ *United States v. City of Black Jack, Missouri*, 508 F.2d 1179, 1184 (8th Cir. 1974)

³⁹ *Ibid.*

⁴⁰ 24 CFR §100 (2013); Rich, Joseph D. “HUD’s New Discriminatory Effects Regulation: Adding Strength and Clarity to Efforts to End Residential Segregation.” Lawyers’ Committee for Civil Rights Under Law. May 2013.

Texas Department of Housing and Community Affairs v. The Inclusive Communities Project

In 2008, a Dallas-based non-profit organization called the Inclusive Communities Project (“the Project”) sued the Texas Department of Housing and Community Affairs (“the Department”), claiming that the point system by which it allocates federal tax subsidies serves to concentrate subsidized housing in low-income communities.⁴¹ In the lawsuit, the Project relied in part on disparate impact theory, which had been established through decades of jurisprudence but upon which the Supreme Court had, at the time, never definitively ruled.

According to the Project, the Department disproportionately allocated low-income housing tax credits in minority areas while denying those credits in predominantly white communities. In addition to the direct effect of concentrating units subsidized through these tax credits, the Project alleged that this manner of allocation led to the further concentration of Section 8 Housing in those same areas⁴², which served to limit housing options for low-income, minority residents to areas with high concentrations of racial minority residents.⁴³ In its original complaint, the Project argued both that the point scheme was intentionally discriminatory and that it produced a disparate impact on minority residents. The District Court for the Northern District of Texas found that the Project had failed to prove intentional discrimination but had proved its disparate impact claim.

Having been upheld in the U.S. Court of Appeals for the Fifth Circuit, the matter then moved to the Supreme Court at the request of the Department.⁴⁴ In asking the Supreme Court to consider the case, the Department presented the court with two questions: First, “are disparate-impact claims cognizable under the Fair Housing Act?”⁴⁵ In other words, does the Act permit disparate-impact claims? Second, in the event that the Court finds that the FHA does allow such claims, the Department also asked “what are the standards and burdens of proof that should apply?”⁴⁶ The Court’s decision on this matter, handed down on June 25, 2015, upheld the availability of discriminatory effects liability under the Fair Housing Act, ruling that a complainant may bring a fair housing claim against an agency or organization based not only on the intent of a policy, but also on discriminatory effects of the policy.⁴⁷

AFFIRMATIVELY FURTHERING FAIR HOUSING IN GEORGIA

The State of Georgia previously conducted an Analysis of Impediments to Fair Housing Choice in 2008. In it, the State identified three impediments that limit fair housing choice among state residents, including the lack of fair housing knowledge among members of the public and local government officials; difficulty securing suitable, accessible housing for residents with disabilities; and language barriers and lack of familiarity that serve as catalysts for

⁴¹ *Inclusive Communities Project v. Texas Department of Housing and Community Affairs* (2014).

⁴² *Ibid.* Section 8 housing vouchers, which are often not accepted by private landlords, cannot be turned down by those who receive low income housing tax credits.

⁴³ *Ibid.*

⁴⁴ Howe, Amy. “Will the third time be the charm for the Fair Housing Act and disparate-impact claims? In Plain English.” Supreme Court of the United States Blog. January 6, 2015. Accessible at “<http://www.scotusblog.com/2015/01/will-the-third-time-be-the-charm-for-the-fair-housing-act-and-disparate-impact-claims-in-plain-english/>”

⁴⁵ *Texas Department of Housing and Community Affairs v. The Inclusive Communities Project* (2014). Petition for a Writ of Certiorari.

⁴⁶ *Ibid.*

⁴⁷ *Texas Department of Housing and Community Affairs v. The Inclusive Communities Project* (2015)

discrimination against Hispanic residents.⁴⁸ In the Annual Action Plan developed for FY2014, the State identified a fourth impediment in the geographic concentrations of racial and ethnic minorities and households living in poverty.

The State of Georgia has implemented a variety of policies to address these impediments, following three main approaches: outreach and education, resource commitment, and program design. The following narrative outlines the actions that the State has taken to address impediments identified in the 2008 AI and subsequent planning documents.⁴⁹

Outreach and Education

The first impediment identified in the 2008 AI document underscored the lack of fair housing knowledge among stakeholders, including residents and local government officials throughout the state. Accordingly, the State has undertaken a variety of outreach and education activities to promote a broader awareness of fair housing law and policy, through the development and marketing of informational materials relating to fair housing, training sessions delivered to stakeholders and policy makers in the state, and other efforts.

The State maintains a family of web pages that provide information on fair housing law, policy, and available resources, which are linked to the Department of Community Affairs' Fair Housing Statement web page. To promote broader awareness of this website, the State created the domain name "FairHousingGeorgia.com", which directs internet users to the Fair Housing Statement page. The State has also developed and distributed a tenant resources guide, fair housing guides, and training materials that have been distributed electronically and in print through facilitated retreats, training sessions, housing workshops, and DCA-sponsored conferences.

In addition to the development of informational materials for trainings sessions, the State has provided, hosted, or facilitated training sessions for local communities, CDBG grant applicants and recipients, and ESG grantees. These training sessions have featured presentations and workshops relating to Fair Housing and the duty to Affirmatively Further Fair Housing (AFFH), delivered by representatives of Metro Fair Housing Services and the Georgia Commission on Equal Opportunity, among others.

Along with these efforts, which were undertaken to address a general lack of knowledge of fair housing law and policy, the State has also conducted outreach and education activities to reduce the impact of language barriers and unfamiliarity with the housing market on the part of Hispanic residents. To that end, the State provides an online resource through GeorgiaHousingSearch.org with the goal of better connecting housing providers and property managers with those who seek affordable housing. In fiscal year 2013-2014, this resource was used to market more than 180,000 housing units in over 80 languages, and state residents used the website to perform nearly two million searches. In addition, the State has identified 18 counties where Limited English Proficiency (LEP) populations exceed five percent of the total

⁴⁸ *State of Georgia Analysis of Impediments to Fair Housing Choice for FFY2008-FFY2012*. Published August 2008.

⁴⁹ For more details on these actions, see the State of Georgia's 2013 *Consolidated Annual Performance and Evaluation Report (CAPER)*, 2014 *Annual Action Plan*, and 2013-2017 *State of Georgia Consolidated Plan*.

population, and has continued to actively market Georgia Dream first and second mortgage programs in neighborhoods with high minority concentrations.

Finally, the DCA includes fair housing instructional materials in manuals utilized to manage the Low-Income Housing Tax Credit and HOME Rental Housing programs, and consults with non-profit developers to determine how the agency can better support efforts to provide affordable housing.

Resource Commitment

In addition to those resources dedicated to outreach, education, and training materials, the State has dedicated monetary, institutional, and administrative resources to a suite of efforts designed to promote suitable and accessible housing for residents with disabilities. For example, a total of \$387,000 in home purchase loans were provided to first time homebuyer's through the Georgia Dream program's Consumer Home Ownership and Independence Choices for Everyone (CHOICE) initiative in FY2013. In another example, a partnership between the State and the Brain and Spinal Injury Trust Fund Commission provided over \$100,000 to complete accessibility modifications.

Furthermore, in an effort to foster the transition of individuals with disabilities from institutional settings to integrated housing, the DCA secured \$4.2 million in resources through the Section 811 Project Rental Assistance Demonstration program in 2013. The State has since taken steps to implement the program in collaboration with the DCA, the Department of Community Health, and the Department of Behavioral Health and Developmental Disabilities. The DCA also continues to fund the construction of supportive housing throughout the state through the HOME-funded Permanent Supportive Housing Program. Since its inception, the program has helped to fund the construction of more than 685 units.

Beyond the monetary resources that the State has dedicated to increasing the stock of accessible and supportive housing in the state, the DCA has provided institutional and administrative resources in the form of agency personnel, facilitation of partnerships with disability-services organizations, and the creation of the 2012 Strategic Housing Plan. Since 2001, the DCA has maintained a position, in partnership with the Georgia Council on Developmental Disabilities, focused on promoting a broader knowledge and understanding about issues pertinent to housing for individuals with disabilities. Since the publication of the 2008 AI, the DCA has worked to coordinate the efforts of housing and disability-services organizations throughout the state through networking and meeting opportunities.

In addition, the State has worked to comply with the Olmstead settlement agreement of 2008 to expand housing options for people with disabilities. A key step in this endeavor was the creation of the Strategic Plan to Create Supportive Housing Options for Persons with Disabilities in 2012. The DCA developed the plan in consultation with the Technical Assistance Collaborative, as well as the Department of Community Health (DCH) and Department of Behavioral Health and Developmental Disabilities (DBHDD). Following the rollout of the Strategic Plan, the DCA, DCH, and DBHDD have continued to meet quarterly to implement the plan.

Program Design

In addition to outreach and education efforts and the commitment of resources to address fair housing challenges identified in the 2008 AI, the State has sought to structure its housing and community development activities in a manner that promotes fair housing choice among its residents. An example of this emphasis on program design is to be found in the State's Qualified Allocation Plan (QAP), and the manner in which QAP points are awarded to affordable housing developers who seek funding under the low-income housing tax credit program ("LIH tax credits", or "LIHTC"). These tax credits are awarded on a competitive basis to developers who agree set aside a certain percentage of new developments to affordable units, and applications for the tax credits are scored on a variety of criteria. Among those criteria are the potential of the housing development to promote integrated supportive housing for residents with disabilities, as well as efforts to locate the housing development in stable neighborhoods and areas of opportunity.

As noted previously, the State identified the difficulties that residents with disabilities face in locating suitable, accessible housing as one of the impediments to fair housing choice in the State in 2008. In an effort to mitigate this impediment, the State provides a point preference in its QAP for affordable housing developers who provide integrated housing opportunities to persons with mental disabilities, among others who are covered by the Olmstead settlement agreement and who are eligible to participate in the Money Follows the Person (MFP) program, a national initiative designed to help individuals with intellectual and developmental disabilities return to their homes and communities.⁵⁰

Furthermore, the State has also designed elements of its QAP to promote affordable housing opportunities in stable neighborhoods and areas of opportunity, as well as to promote community revitalization efforts. In the 2008 AI, the State noted the existence of areas with high concentrations of racial and ethnic minorities and households living in poverty, and identified these concentrations as an impediment to fair housing choice.

The State currently includes a series of provisions in its QAP designed promote community revitalization in those areas, as well as to ensure that affordable housing options were available outside of those areas. To promote community revitalization efforts, the QAP requires an analysis of those efforts in applications for prospective LIHTC developments, limiting development priorities to areas in which neighborhood revitalization efforts have a real chance of success.

In addition, and to promote development in stable, high opportunity neighborhoods, the State provides additional QAP points to projects slated for development in middle- to upper-income Census tracts with low rates of poverty. Moreover, in recognition of the fact that local opposition can often present a barrier to the development of affordable housing, the State no longer provides additional QAP points for "resolution of support", stating that "[l]ocal government opposition that appears to be discriminatory or violate fair housing laws will not be grounds for failure of a project⁵¹."

⁵⁰ "Georgia Money Follows the Person". Georgia Department of Community Health website. Accessed March 22, 2016 at <https://dch.georgia.gov/georgia-money-follows-person-ga-mfp>.

⁵¹ 2014 *Annual Action Plan*, p. 64

Additionally, as a measure to promote the marketing of affordable housing options, developers are required to list all of their housing developments on GeorgiaHousingSearch.org before they can apply for LIH tax credits.

In sum, the State has undertaken a variety of steps to address the four impediments identified in the 2008 Analysis of Impediments to Fair Housing Choice and subsequent planning documents. These steps can be organized into three overall approaches (though of course there is often considerable overlap between approaches): outreach and education, commitment of resources, and program design. The State will continue to address new and long-term fair housing challenges, supplementing these efforts with new strategies to promote fair housing choice for Georgia residents, as outlined in the Executive Summary.

For more detail on these and other actions that the State has taken with regard to previously identified impediments, including information concerning the State's QAP requirements, see Appendix O.

SECTION IV. REVIEW OF THE EXISTING FAIR HOUSING STRUCTURE

The purpose of this section is to provide a profile of fair housing in the State of Georgia 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.

COMPLAINT PROCESS REVIEW

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 state 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.⁵² 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:

- 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.⁵³

⁵² "HUD's Title VIII Fair Housing Complaint Process." <http://www.hud.gov/offices/fheo/complaint-process.cfm>

⁵³ "Fair Housing—It's Your Right." <http://www.hud.gov/offices/fheo/FHLaws/yourrights.cfm>

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.⁵⁴

The Georgia Commission on Equal Opportunity

The complaint process laid out in Georgia's Fair Housing Law is similar to the process provided for in the federal Fair Housing Act, as described above. The agency designated by the statute to enforce the state fair housing law, the Georgia Commission on Equal Opportunity (GCEO), was a participant in the Fair Housing Assistance Program (FHAP) until 2012. As noted above, agencies may only participate in the FHAP if they enforce laws that HUD deems "substantially equivalent" to the FHA.

Within ten days of the receipt of such a complaint, the GCEO will inform the party against whom the complaint is directed (the respondent). After the complaint is submitted, the GCEO will begin investigation of the complaint. At the same time, the GCEO will attempt to facilitate a process of conciliation.

If the conciliation process fails and the complaint is found to have cause, or if the GCEO administrator otherwise determines that prompt judicial action is necessary to carry out the provisions of the Georgia Fair Housing Act, he or she will refer the matter to the Attorney General. If the complaint is not found to have cause, it will be dismissed.

If the complaint is found to have cause, the matter may be settled through an administrative procedure or in a civil action, subject to the decision of the complainant. If the respondent is ruled to have discriminated against the complainant in the provision of housing, he or she may be subject to up to \$50,000 in fines, depending on how many times he or she has been found guilty of discrimination in housing⁵⁵.

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 Atlanta oversees housing, community development, and fair housing enforcement in Georgia, as well as in Mississippi,

⁵⁴ "HUD's Title VIII Fair Housing Complaint Process." <http://www.hud.gov/offices/fheo/complaint-process.cfm>

⁵⁵ O.C.G.A. §§8-3-208, 8-3-209, 8-3-211, 8-3-213; available from [://www.lexisnexis.com/hottopics/gacode/Default.asp](http://www.lexisnexis.com/hottopics/gacode/Default.asp).

Tennessee, Kentucky, North Carolina, South Carolina, Alabama, Florida, the U.S. Virgin Islands, and Puerto Rico. Contact information for HUD is listed below⁵⁶:

Address:

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 Atlanta is:

Address:

Atlanta Regional Office
U.S. Department of Housing and Urban Development Southeast Office
40 Marietta Street
Atlanta, GA 30303

Telephone: (404) 331-5001

Website: <http://www.HUD.gov>

The Office of Fair Housing and Equal Opportunity (FHEO) in HUD's Atlanta office enforces the Fair Housing Act and other civil rights laws that prohibit discrimination in housing, mortgage lending, and other related transactions in Georgia. HUD also provides education and outreach, monitors agencies that receive HUD funding for compliance with civil rights laws, and works with state 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 state 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 determines whether a state or local law provides protections that are equivalent to the Fair Housing Act, at least on paper. Once this determination has been made, and the law has been judged to be substantially equivalent, the agency enforcing the law may sign a memorandum of understanding with HUD, thereby becoming 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." FHAP grants during this time period are issued to support the process of building capacity. When the interim certification period ends after three years, the Assistant Secretary issues a determination on whether or not the state 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 for five years.

HUD will typically refer most complaints of housing discrimination to a state or local FHAP agency for investigation (such complaints are dual-filed at HUD and the State 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. Until recently, the Georgia Commission on Equal Opportunity was a participant in the FHAP. The GCEO withdrew from the program in 2012, though it is currently working to renew its certification.

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 initiatives⁵⁷: 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 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 State 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.

⁵⁷ Though there are four initiatives included in the FHIP, no funds are currently available through the Administrative Enforcement Initiative.

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 State and local government agencies.

Georgia residents have been served by several FHIP grantees over the past decade, though are currently only served by one: Metro Fair Housing Services, Inc. This organization has been a consistent FHIP grantee over the last decade, having been awarded funding under the Private Enforcement Initiative in every year since 2004, with the exceptions of 2006 and 2007. Metro Fair Housing makes use of the FHIP funding it receives to conduct education and outreach, complaint intake and processing, and fair housing testing (systemic and complaint-based) in areas that include the Greater Atlanta Metropolitan Area and the counties of Gwinnett, Forsyth, Hall, Barrow, Jackson, Fulton, and DeKalb.

STATE AGENCIES

The Georgia Commission on Equal Opportunity

The Georgia Commission on Equal Opportunity (GCEO) was established in 1978 to enforce the provisions of the Fair Employment Practices Act of 1978. In 1988, with the passage of the Georgia Fair Housing Law, the mission of the GCEO was expanded to include efforts to combat housing discrimination.⁵⁸ Those who believe that they have been subjected to illegal discrimination in the housing market may contact the GCEO through the following information:

Georgia Commission on Equal Opportunity

7 Martin Luther King, Jr. Drive, Southeast

3rd Floor, Suite 351

Atlanta, Georgia 30334

Telephone: (404) 656-6003

Toll Free: 1(800) 473-OPEN(6736)

FAX: (404) 656-4399

Online Complaint Form: <http://gceo.state.ga.us/to-file-a-complaint/>.

PRIVATE ORGANIZATIONS

Metro Fair Housing Services

Metro Fair Housing Services of Atlanta serves residents of the Atlanta metropolitan area who believe that they have been subjected to illegal discrimination in the housing market. A

⁵⁸ "About Georgia Commission on Equal Opportunity." Georgia Commission on Equal Opportunity website. Accessed 14 July 2015, at <http://gceo.state.ga.us/sample-page-2/>.

consistent participant in HUD's Fair Housing Initiatives Program, the non-profit organization has served Atlanta-area residents since 1974. Metro Fair Housing may be contacted through the following information:

Metro Fair Housing Services

175 Trinity Avenue Southwest

Atlanta, Georgia 30303

Telephone: (404) 524-0000

FAX: (404) 524-0005

Email: <http://www.metrofairhousing.com/contact.htm> (Online contact form)

Savannah-Chatham Fair Housing Council

The Savannah-Chatham Fair Housing Council (SCFHC) serves residents of Savannah and Chatham Counties, accepting and processing complaints from residents who believe that they may have been subjected to illegal discrimination in the housing market. The organization, which has served in prior years as a participant in the FHIP, may be contacted through the following information:

Savannah-Chatham Fair Housing Council

1900 Abercorn Street

Savannah, Georgia 31401

Telephone: (912) 651-3136

FAX: (912) 651-3137

SUMMARY

A Georgia resident who believes that he or she may have suffered illegal discrimination in the housing market may file a complaint with HUD or the Georgia Commission on Equal Opportunity (GCEO). The former enforces the federal Fair Housing Act (FHA), while the latter enforces the Georgia's fair housing law. In past years, HUD's determination that the state law was "substantially equivalent" to the FHA allowed the GCEO to participate in the Fair Housing Assistance Program (FHAP), under which GCEO was eligible to receive funding from HUD to support its fair housing activities. However, the GCEO has not participated in the FHAP since 2012.

When HUD or the GCEO receives a complaint alleging discrimination in the housing market, it will generally notify the accused party ("the respondent") and begin an investigation within thirty days. During the investigation, the complaint may be voluntarily resolved through an agreement between the complainant and respondent. At the end of the investigation, HUD or the GCEO determines whether the complaint has merit; if not, the complaint will be dismissed, though the complainant retains the option of filing a lawsuit against the respondent. If the complaint is found to have merit, the complainant or respondents may elect to have the matter tried in court, or may elect to pursue the complaint in an administrative hearing.

When the GCEO served as a FHAP participant, failure to complete an investigation within 100 days after the complaint is received would like result in HUD taking the complaint back for

investigation, unless the GCEO could demonstrate that it was impracticable to complete the complaint in that time frame.

HUD and the GCEO; which are responsible for enforcing the FHA and Georgia's fair housing law, respectively; represent the backbone of fair housing enforcement and administration in the state. However, the state's fair housing infrastructure is also composed of private and non-profit organizations that play a role in fair housing enforcement, outreach, and education. These organizations apply for and receive funding from HUD to carry out fair housing activities under the Fair Housing Initiatives Program (FHIP). In Georgia, there is one organization currently serving as a FHIP participant in the state: Atlanta-based Metro Fair Housing Services, which serves residents of the Atlanta metropolitan area. However, residents of Savannah and Chatham County are served by the Savannah-Chatham Fair Housing Council, which has been a FHIP grantee in previous years.

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 State of Georgia's public sector is presented in **Section VI**, while this section focuses on research regarding the state's private sector, including the mortgage lending market, the real estate market, the rental market, and other private sector housing industries.

LENDING POLICIES AND PRACTICES 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.⁵⁹ 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.⁶⁰ Both types of lending institutions must meet the following set of reporting criteria:

⁵⁹ *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>

⁶⁰ 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;⁶¹
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

Financial institutions handled a total of 7,413,253 home loans or loan applications throughout the state from 2004 through 2013. As shown in Table V.1 on the following page, over 3,419,000 of these loans, or roughly 46 percent, pertained to home loans in the state's non-entitlement areas, and around 38 percent of these were intended to finance the purchase of a home. This percentage is slightly lower than the proportion of loans in the state's entitlement areas that were intended for home purchases: home improvement or refinancing loans accounted for a slightly larger percentage of home loans in the state's non-entitlement areas.

⁶¹ 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.

Table V.1
Purpose of Loan by Year
 Non-Entitlement Areas of Georgia
 2004–2013 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Non-Entitlement Areas of Georgia											
Home Purchase	170,767	214,645	226,307	159,980	96,371	83,685	77,507	78,802	81,490	93,004	1,282,558
Home Improvement	28,031	33,478	32,859	32,044	20,549	12,201	9,516	10,546	12,019	13,522	204,765
Refinancing	237,225	257,115	245,862	224,061	171,430	200,737	143,724	131,257	168,585	151,740	1,931,736
Total	436,023	505,238	505,028	416,085	288,350	296,623	230,747	220,605	262,094	258,266	3,419,059
Entitled Areas of Georgia											
Home Purchase	243,869	319,195	334,891	210,541	117,196	100,990	84,900	83,575	90,344	99,326	1,684,827
Home Improvement	27,141	33,417	34,657	31,311	18,419	9,162	6,797	8,883	11,605	12,624	194,016
Refinancing	288,821	300,180	280,532	241,875	159,837	205,413	144,395	131,195	195,421	167,682	2,115,351
Total	559,831	652,792	650,080	483,727	295,452	315,565	236,092	223,653	297,370	279,632	3,994,194
State of Georgia											
Home Purchase	414,636	533,840	561,198	370,521	213,567	184,675	162,407	162,377	171,834	192,330	2,967,385
Home Improvement	55,172	66,895	67,516	63,355	38,968	21,363	16,313	19,429	23,624	26,146	398,781
Refinancing	526,046	557,295	526,394	465,936	331,267	406,150	288,119	262,452	364,006	319,422	4,047,087
Total	995,854	1,158,030	1,155,108	899,812	583,802	612,188	466,839	444,258	559,464	537,898	7,413,253

For the purposes of the 2016 AI, analysis of home lending data will be confined to trends in home purchase loans, and specifically “owner-occupied” home purchase loans. These loans, which are intended to finance the purchase in which the owner intends to live, provide the best index available in these data of the ability of homebuyers and prospective homebuyers to choose where they will live. As shown in Table V.2 below, nearly 1,118,000 loans and prospective loans in the state’s non-entitlement areas were intended to finance the purchase of an owner-occupied housing unit, representing over 87 percent of all home purchase loans in those areas. A similar proportion of home purchase loans and loan applications were connected to owner-occupied housing units in the state’s entitlement areas.

Table V.2
Occupancy Status for Home Purchase Loan Applications
 Non-Entitlement Areas of Georgia
 2004–2013 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Non-Entitlement Areas of Georgia											
Owner-Occupied	150,266	185,577	191,335	136,493	82,744	74,953	69,287	70,067	72,843	84,357	1,117,922
Not Owner-Occupied	19,335	27,903	33,833	22,708	13,271	8,494	8,092	8,467	8,323	8,494	158,920
Not Applicable	1,166	1,165	1,139	779	356	238	128	268	324	153	5,716
Total	170,767	214,645	226,307	159,980	96,371	83,685	77,507	78,802	81,490	93,004	1,282,558
Entitled Areas of Georgia											
Owner-Occupied	212,624	265,557	272,374	178,243	102,285	93,075	77,926	76,118	82,434	91,656	1,452,292
Not Owner-Occupied	29,182	51,305	61,647	31,685	14,630	7,754	6,868	7,285	7,672	7,487	225,515
Not Applicable	2,063	2,333	870	613	281	161	106	172	238	183	7,020
Total	243,869	319,195	334,891	210,541	117,196	100,990	84,900	83,575	90,344	99,326	1,684,827
State of Georgia											
Owner-Occupied	362,890	451,134	463,709	314,736	185,029	168,028	147,213	146,185	155,277	176,013	2,570,214
Not Owner-Occupied	48,517	79,208	95,480	54,393	27,901	16,248	14,960	15,752	15,995	15,981	384,435
Not Applicable	3,229	3,498	2,009	1,392	637	399	234	440	562	336	12,736
Total	414,636	533,840	561,198	370,521	213,567	184,675	162,407	162,377	171,834	192,330	2,967,385

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.

Approximately one-fifth of owner-occupied home purchase loan applications in the state were denied from 2004 through 2013, as shown in Table V.3 on the following page. Over 531,000 loans were originated in Georgia’s non-entitlement areas during that same period, and nearly 131,000 were denied, for an overall denial rate of 19.8 percent. Considerably more loans were originated in the state’s entitlement jurisdictions, but the denial rate was similar to what was observed in the non-entitlement areas.

Yearly data on loan denials indicate that the denial rate in the state’s non-entitlement areas has been steadily increasing since 2004, when 17.2 percent of owner-occupied home purchase loan applications were denied, as shown in Diagram V.1 below.

Diagram V.1
Denial Rates by Year
 State of Georgia
 2004–2013 HMDA Data

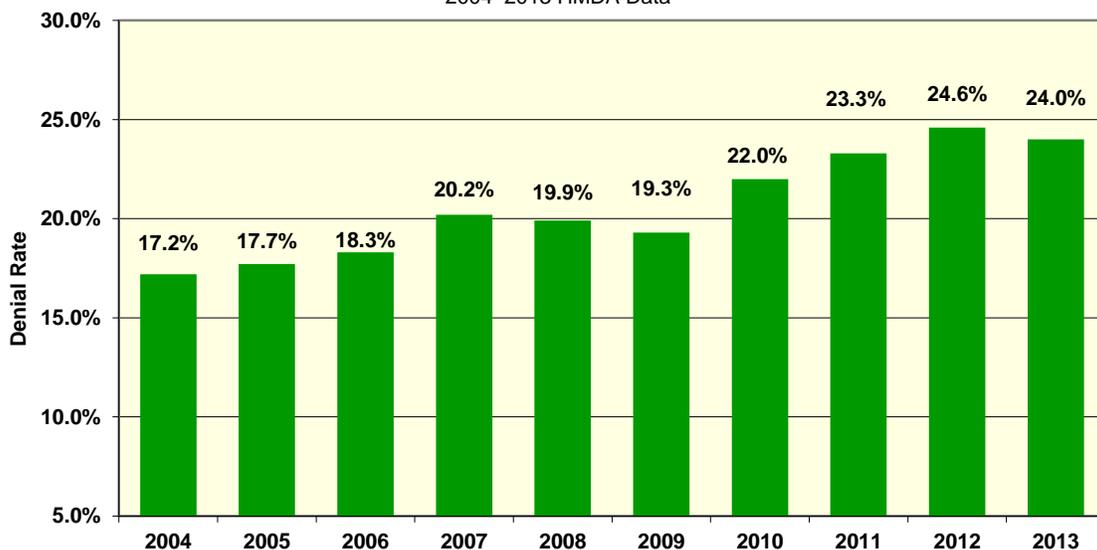
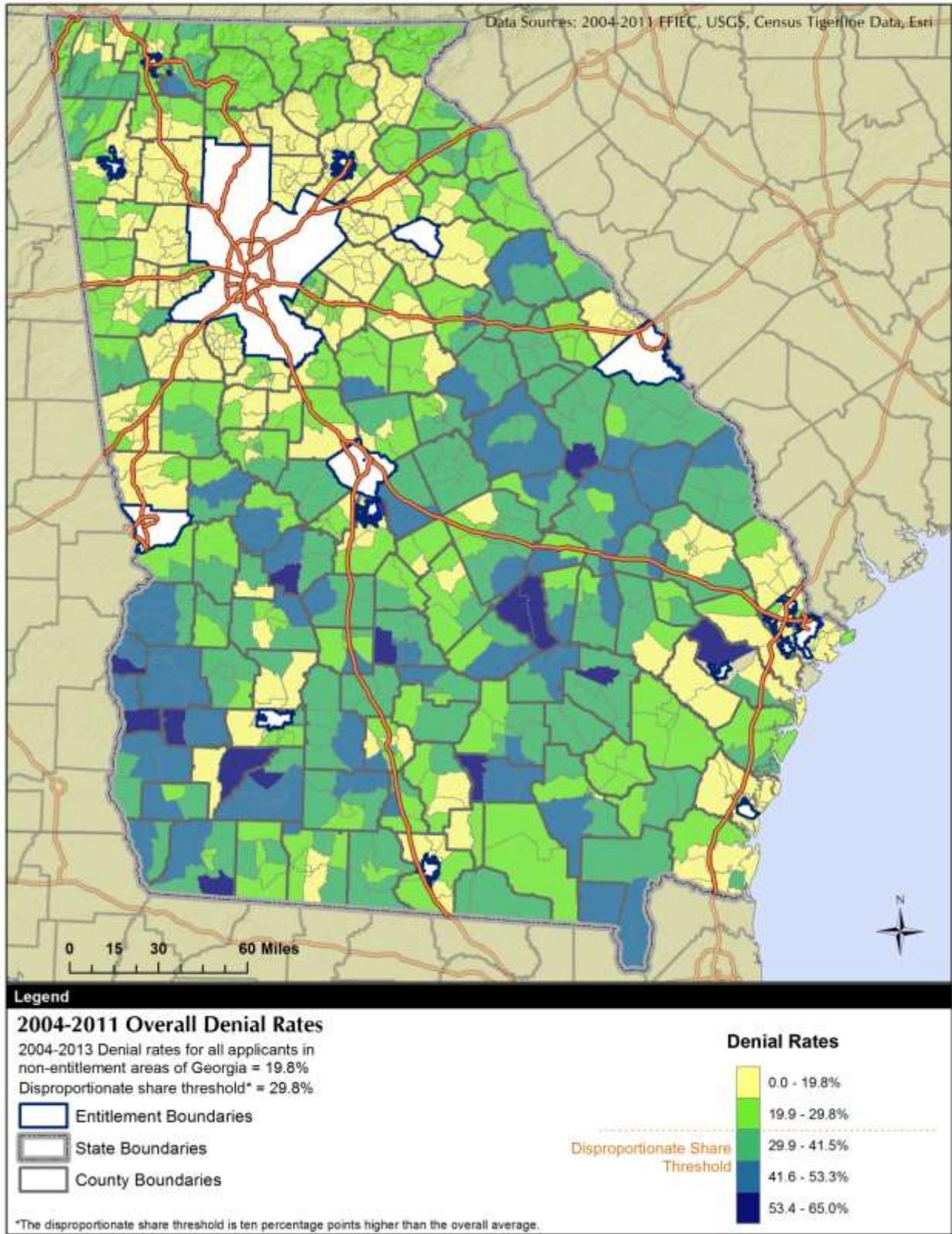


Table V.3
Loan Applications by Action Taken
 Non-Entitlement Areas of Georgia
 2004–2013 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Non-Entitlement Areas of Georgia											
Loan Originated	76,843	92,854	94,454	66,067	39,954	32,684	30,434	29,859	30,814	37,216	531,179
Application Approved but not Accepted	7,340	8,497	9,704	6,971	3,428	1,725	2,163	2,699	2,628	3,292	48,447
Application Denied	15,924	19,978	21,144	16,675	9,956	7,800	8,570	9,083	10,053	11,741	130,924
Application Withdrawn by Applicant	8,858	12,513	12,879	8,893	6,431	5,363	5,039	4,821	4,736	5,968	75,501
File Closed for Incompleteness	2,751	3,312	2,933	2,351	1,514	1,191	1,056	1,068	864	1,868	18,908
Loan Purchased by the Institution	38,550	48,247	50,202	35,515	21,454	26,082	22,023	22,536	23,695	24,231	312,535
Preapproval Request Denied	0	173	14	19	7	108	2	0	28	20	371
Preapproval Approved but not Accepted	0	3	5	2	0	0	0	1	25	21	57
Total	150,266	185,577	191,335	136,493	82,744	74,953	69,287	70,067	72,843	84,357	1,117,922
Denial Rate	17.2%	17.7%	18.3%	20.2%	19.9%	19.3%	22.0%	23.3%	24.6%	24.0%	19.8%
Entitled Areas of Georgia											
Loan Originated	111,261	131,833	127,787	81,411	46,875	39,115	35,067	32,644	37,062	42,727	685,782
Application Approved but not Accepted	10,105	12,562	15,464	10,521	4,898	2,438	2,190	2,567	2,213	2,408	65,366
Application Denied	22,010	30,601	34,901	23,718	12,151	8,016	7,745	7,362	8,304	8,683	163,491
Application Withdrawn by Applicant	14,192	20,798	20,376	12,101	8,571	7,038	6,943	6,791	6,825	8,186	111,821
File Closed for Incompleteness	4,371	5,997	5,326	3,602	2,104	1,514	1,103	1,041	1,128	1,705	27,891
Loan Purchased by the Institution	50,685	63,477	68,490	46,848	27,677	34,678	24,876	25,709	26,890	27,936	397,266
Preapproval Request Denied	0	282	27	42	9	276	2	4	7	9	658
Preapproval Approved but not Accepted	0	7	3	0	0	0	0	0	5	2	17
Total	212,624	265,557	272,374	178,243	102,285	93,075	77,926	76,118	82,434	91,656	1,452,292
Denial Rate	16.5%	18.8%	21.5%	22.6%	20.6%	17.0%	18.1%	18.4%	18.3%	16.9%	19.3%
State of Georgia											
Loan Originated	188,104	224,687	222,241	147,478	86,829	71,799	65,501	62,503	67,876	79,943	1,216,961
Application Approved but not Accepted	17,445	21,059	25,168	17,492	8,326	4,163	4,353	5,266	4,841	5,700	113,813
Application Denied	37,934	50,579	56,045	40,393	22,107	15,816	16,315	16,445	18,357	20,424	294,415
Application Withdrawn by Applicant	23,050	33,311	33,255	20,994	15,002	12,401	11,982	11,612	11,561	14,154	187,322
File Closed for Incompleteness	7,122	9,309	8,259	5,953	3,618	2,705	2,159	2,109	1,992	3,573	46,799
Loan Purchased by the Institution	89,235	111,724	118,692	82,363	49,131	60,760	46,899	48,245	50,585	52,167	709,801
Preapproval Request Denied	0	455	41	61	16	384	4	4	35	29	1,029
Preapproval Approved but not Accepted	0	10	8	2	0	0	0	1	30	23	74
Total	362,890	451,134	463,709	314,736	185,029	168,028	147,213	146,185	155,277	176,013	2,570,214
Denial Rate	16.8%	18.4%	20.1%	21.5%	20.3%	18.1%	19.9%	20.8%	21.3%	20.3%	19.5%

Just under a fifth of all owner-occupied home mortgage applications in the state's non-entitlement areas were turned down from 2004-2013. As shown in Map V.1 on the following page, home mortgage denial rates in the state's rural areas tended to exceed that overall average in rural Census tracts, but were relatively low in and around the state's urban and suburban areas, during the period from 2004 through 2011. During that time, the average Census tract in the state received around 593 home loan applications: the number of loan applications submitted in rural Census tracts tended, as one might expect, to be well below average.

Map V.1
Denial Rates by Census Tract, 2004-2011
 Non-Entitlement Areas of Georgia
 2004-2011 HMDA Data



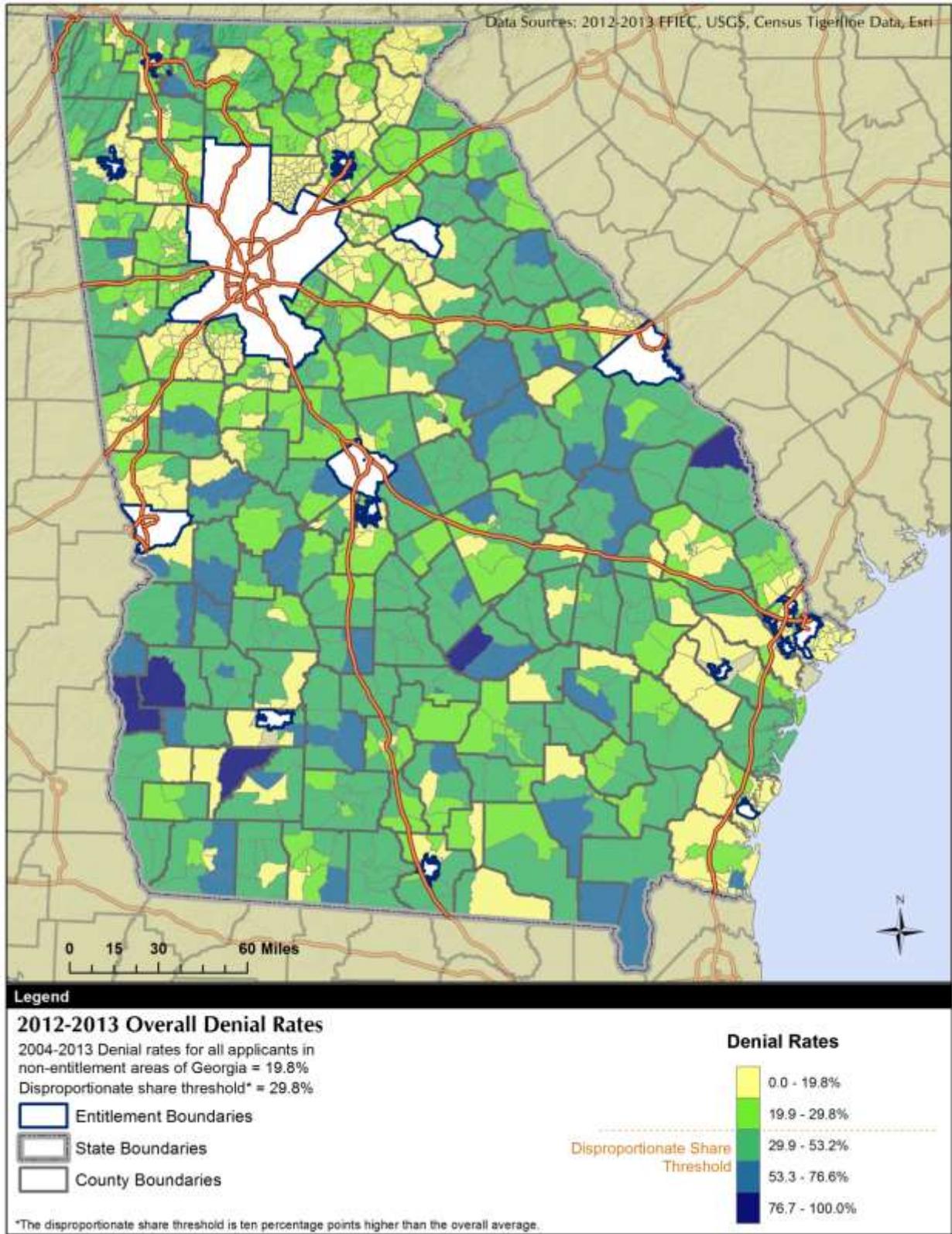
A similar trend was observed after 2011. However, as shown in Map V.2 on the following page, relatively high denial rates were more widespread in 2012 and 2013. Prior to 2012, denial rates in Census tracts surrounding the Atlanta metropolitan area were almost uniformly at or below average, with the exception of a few Census tracts to the southeast and southwest of Atlanta that saw higher denial rates. In 2012-2013 however, above-average denial rates had become more common in and around the Atlanta MSA, as they had in suburban and urban areas throughout the state.

Denial rates also differed considerably according to the gender of the applicant, as shown in Table V.4 below. Female applicants intending to purchase a home in the state’s non-entitlement areas were denied 22.9 percent of the time from 2004 through 2013, compared to a denial rate of 17.7 for male applicants. The discrepancy between the two, of 5.2 percent points on average, has been more pronounced in recent years, ranging as high as 7.4 percentage points. Denial rates for female and male borrowers were closer to parity in the state’s entitlement jurisdictions, where the difference between the two was only 2.7 percent over the decade. However, as in the state’s non-entitlement areas, this discrepancy has been more pronounced in recent years.

Table V.4
Denial Rates by Gender of Applicant
 Non-Entitlement Areas of Georgia
 2004–2013 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
Non-Entitlement Areas of Georgia					
2004	15.2%	19.8%	27.2%	9.5%	17.2%
2005	15.9%	20.5%	25.1%	45.5%	17.7%
2006	16.3%	20.9%	27.5%	22.7%	18.3%
2007	18.0%	23.2%	28.5%	19.2%	20.2%
2008	17.7%	23.8%	26.1%	22.2%	19.9%
2009	17.7%	22.3%	20.4%	28.6%	19.3%
2010	20.1%	25.6%	23.7%	33.3%	22.0%
2011	21.0%	27.7%	25.8%	50.0%	23.3%
2012	21.8%	29.2%	33.7%	30.0%	24.6%
2013	21.4%	28.2%	33.7%	25.0%	24.0%
Average	17.7%	22.9%	27.1%	26.3%	19.8%
Entitled Areas of Georgia					
2004	15.0%	17.4%	27.5%	14.8%	16.5%
2005	17.5%	20.2%	22.6%	34.8%	18.8%
2006	20.4%	22.8%	22.6%	69.2%	21.5%
2007	21.2%	23.9%	26.5%	40.0%	22.6%
2008	19.7%	21.9%	20.7%	27.3%	20.6%
2009	16.2%	18.1%	17.9%	14.3%	17.0%
2010	16.6%	19.6%	21.5%	40.0%	18.1%
2011	16.8%	20.0%	23.6%	16.7%	18.4%
2012	16.7%	20.0%	24.1%	14.3%	18.3%
2013	15.3%	18.6%	21.6%	14.3%	16.9%
Average	17.9%	20.6%	23.2%	29.5%	19.3%
State of Georgia					
2004	15.1%	18.3%	27.4%	12.5%	16.8%
2005	16.8%	20.3%	23.5%	40.0%	18.4%
2006	18.6%	22.1%	24.4%	40.0%	20.1%
2007	19.7%	23.7%	27.2%	29.4%	21.5%
2008	18.7%	22.7%	22.7%	25.0%	20.3%
2009	17.0%	19.8%	18.8%	23.8%	18.1%
2010	18.4%	22.2%	22.3%	35.7%	19.9%
2011	19.0%	23.5%	24.5%	33.3%	20.8%
2012	19.3%	24.0%	28.0%	20.8%	21.3%
2013	18.5%	23.0%	26.3%	18.2%	20.3%
Average	17.8%	21.5%	24.7%	27.9%	19.5%

Map V.2
Denial Rates by Census Tract, 2012-2013
 Non-Entitlement Areas of Georgia
 2012-2013 HMDA Data



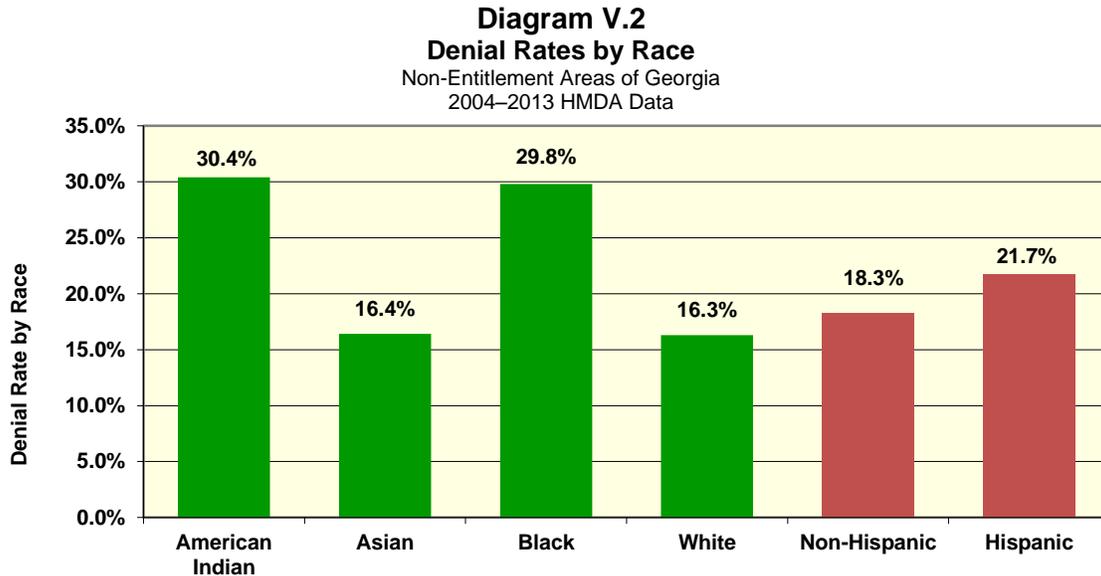
Denial rates varied considerably according to the race of the applicant, as shown in Table V.5 below. Around 16 percent of white applicants were turned down from 2004 through 2013 in the state’s non-entitlement areas, while black applicants were denied at a rate of 29.8 percent, ten percentage points above the average denial rate. This discrepancy was even more pronounced in the state’s entitlement areas, where the denial rate for white applicants was nearly five percentage points lower, at 11.7 percent, and the denial rate for black applicants was 28.9 percent. Denial rates were also observed to differ, though to a lesser degree, according to the ethnicity of the applicant: 21.7 percent of applications from Hispanic applicants for homes in the state’s non-entitlement areas were denied compared to a denial rate of 18.3 for non-Hispanic residents. The variation in denial rates by ethnicity was similar in the state’s entitlement jurisdictions. Overall denial rates by race and ethnicity are presented in Diagram V.2 on the following page.

Table V.5
Denial Rates by Race/Ethnicity of Applicant
 Non-Entitlement Areas of Georgia
 2004–2013 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Average
Non-Entitlement Areas of Georgia											
American Indian	25.8%	31.7%	26.6%	28.1%	30.4%	30.0%	32.5%	31.4%	41.8%	39.6%	30.4%
Asian	13.7%	15.0%	14.4%	17.6%	19.1%	19.0%	18.7%	18.9%	16.2%	16.6%	16.4%
Black	25.8%	26.8%	28.2%	31.8%	31.0%	29.2%	30.7%	34.6%	37.7%	38.0%	29.8%
White	13.7%	14.0%	14.0%	16.1%	16.7%	16.9%	19.8%	20.1%	21.2%	20.5%	16.3%
Not Available	27.3%	26.7%	28.8%	29.0%	25.3%	21.4%	24.7%	31.6%	35.3%	36.0%	28.2%
Not Applicable	21.8%	34.8%	28.0%	25.0%	17.6%	15.4%	33.3%	81.8%	22.2%	25.0%	24.5%
Average	17.2%	17.7%	18.3%	20.2%	19.9%	19.3%	22.0%	23.3%	24.6%	24.0%	19.8%
Non-Hispanic	15.6%	16.0%	16.9%	19.0%	19.0%	18.6%	21.0%	21.7%	21.9%	21.0%	18.3%
Hispanic	20.1%	22.1%	17.8%	21.6%	24.0%	23.3%	24.3%	23.1%	27.8%	24.3%	21.7%
Entitled Areas of Georgia											
American Indian	22.6%	24.1%	25.3%	37.5%	30.2%	25.4%	35.8%	27.0%	30.6%	21.8%	26.8%
Asian	12.1%	15.3%	15.9%	17.9%	20.0%	17.9%	19.9%	18.4%	17.5%	16.9%	16.5%
Black	24.7%	27.4%	32.0%	35.0%	30.3%	25.3%	24.3%	26.1%	27.7%	27.6%	28.9%
White	9.3%	11.0%	11.7%	12.7%	13.9%	12.3%	13.1%	12.8%	12.9%	12.1%	11.7%
Not Available	26.0%	24.7%	27.4%	28.3%	22.0%	18.1%	22.8%	27.7%	26.7%	21.8%	25.2%
Not Applicable	27.8%	35.0%	30.0%	41.2%	28.6%	25.0%	25.0%	50.0%	14.3%	14.3%	28.3%
Average	16.5%	18.8%	21.5%	22.6%	20.6%	17.0%	18.1%	18.4%	18.3%	16.9%	19.3%
Non-Hispanic	14.8%	17.6%	20.6%	21.6%	19.7%	16.4%	16.7%	16.6%	16.8%	15.7%	18.1%
Hispanic	17.5%	20.1%	21.4%	23.1%	30.0%	21.4%	24.7%	22.8%	21.5%	21.7%	21.6%
State of Georgia											
American Indian	23.8%	27.2%	25.9%	33.1%	30.3%	27.8%	34.2%	29.3%	35.7%	30.4%	28.4%
Asian	12.5%	15.2%	15.6%	17.8%	19.8%	18.2%	19.6%	18.6%	17.2%	16.8%	16.5%
Black	25.0%	27.2%	30.9%	34.0%	30.5%	26.5%	26.5%	29.1%	31.2%	31.5%	29.2%
White	11.5%	12.5%	12.9%	14.5%	15.5%	14.8%	16.9%	16.9%	17.4%	16.7%	14.1%
Not Available	26.5%	25.4%	27.9%	28.5%	23.2%	19.3%	23.6%	29.4%	30.2%	27.4%	26.3%
Not Applicable	25.7%	34.9%	28.9%	31.7%	23.7%	17.6%	30.8%	73.3%	18.8%	18.2%	26.8%
Average	16.8%	18.4%	20.1%	21.5%	20.3%	18.1%	19.9%	20.8%	21.3%	20.3%	19.5%
Non-Hispanic	15.1%	16.9%	19.0%	20.4%	19.3%	17.5%	18.8%	19.2%	19.3%	18.3%	18.2%
Hispanic	18.3%	20.7%	20.2%	22.6%	27.9%	22.1%	24.6%	22.9%	23.9%	22.8%	21.6%

As shown in Map V.3 on page 85, denial rates for black residents from 2004 through 2011 tended to mirror trends in overall denial rates during that time. In other words, black residents who applied for home purchase loans in and around the state’s urban and suburban areas were more likely to secure a loan than those who applied for home purchase loans in rural areas of the state.

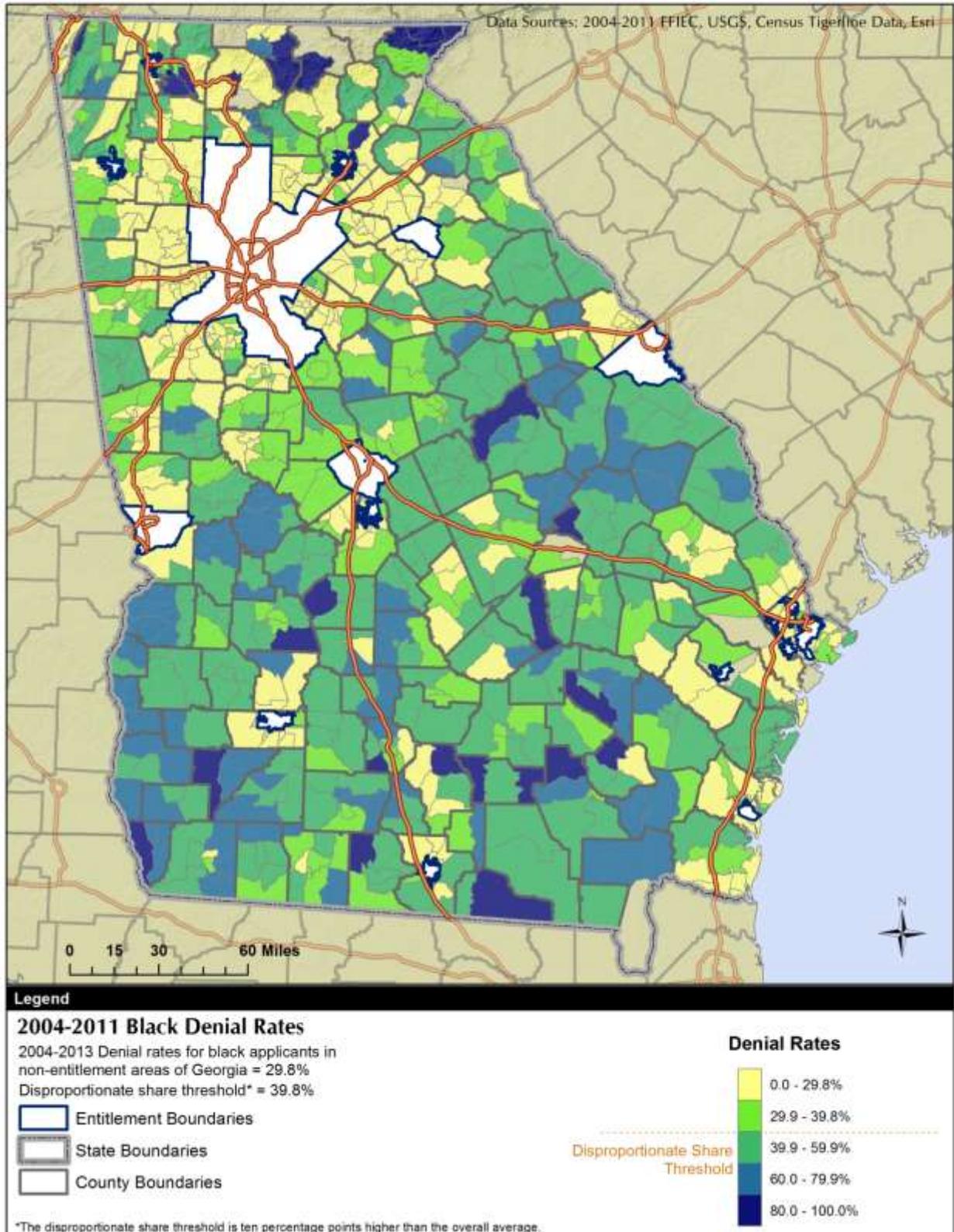
Hispanic borrowers were also more likely to secure a loan for housing units in and around the Atlanta metropolitan area, as shown in Map V.4 on page 86. In fact, as in the population as a whole, a substantial percentage of the home purchase loan applicants submitted by Hispanic residents were intended to finance the purchase of homes in and around Atlanta. Though denial rates to Hispanic borrowers were relatively high throughout the southern part of the state, those denial rates were often based on relatively few loan applications.



Credit history and debt-to-income ratio were consistently among the most prominent factors contributing to the decision to deny a loan, according to financial institutions reporting to the FFIEC. As shown in Table V.6 on page 87, credit history was cited as a factor in 34,871 loan denials in the state’s non-entitlement areas, over a quarter of loan denials throughout the ten-year period. Debt-to-income ratio was listed as a primary factor in around 18,000 loan denials, or around 14 percent. The prominence of each of these factors in the loan application process has varied over time: In 2006, some 22.2 percent of loan denials in the state’s non-entitlement areas cited credit history as a primary factor.

By 2011 that figure had grown to 33.4 percent. Similarly, debt-to-income ratio was a primary factor in 19.3 percent of loan denials in 2009, up from 10.4 percent in 2005. Recently, both have declined in prominence as factors in the decision to deny a loan, while the percentage of applications with missing information concerning the reason for denial has grown. Credit history and debt-to-income ratio were also the two most prominent reasons given for loan denials in the state’s entitlement jurisdictions.

Map V.3
Denial Rates for Black Applicants by Census Tract, 2004-2011
 Non-Entitlement Areas of Georgia
 2004-2011 HMDA Data



Map V.4
Denial Rates for Hispanic Applicants by Census Tract, 2004-2011
 Non-Entitlement Areas of Georgia
 2004-2011 HMDA Data

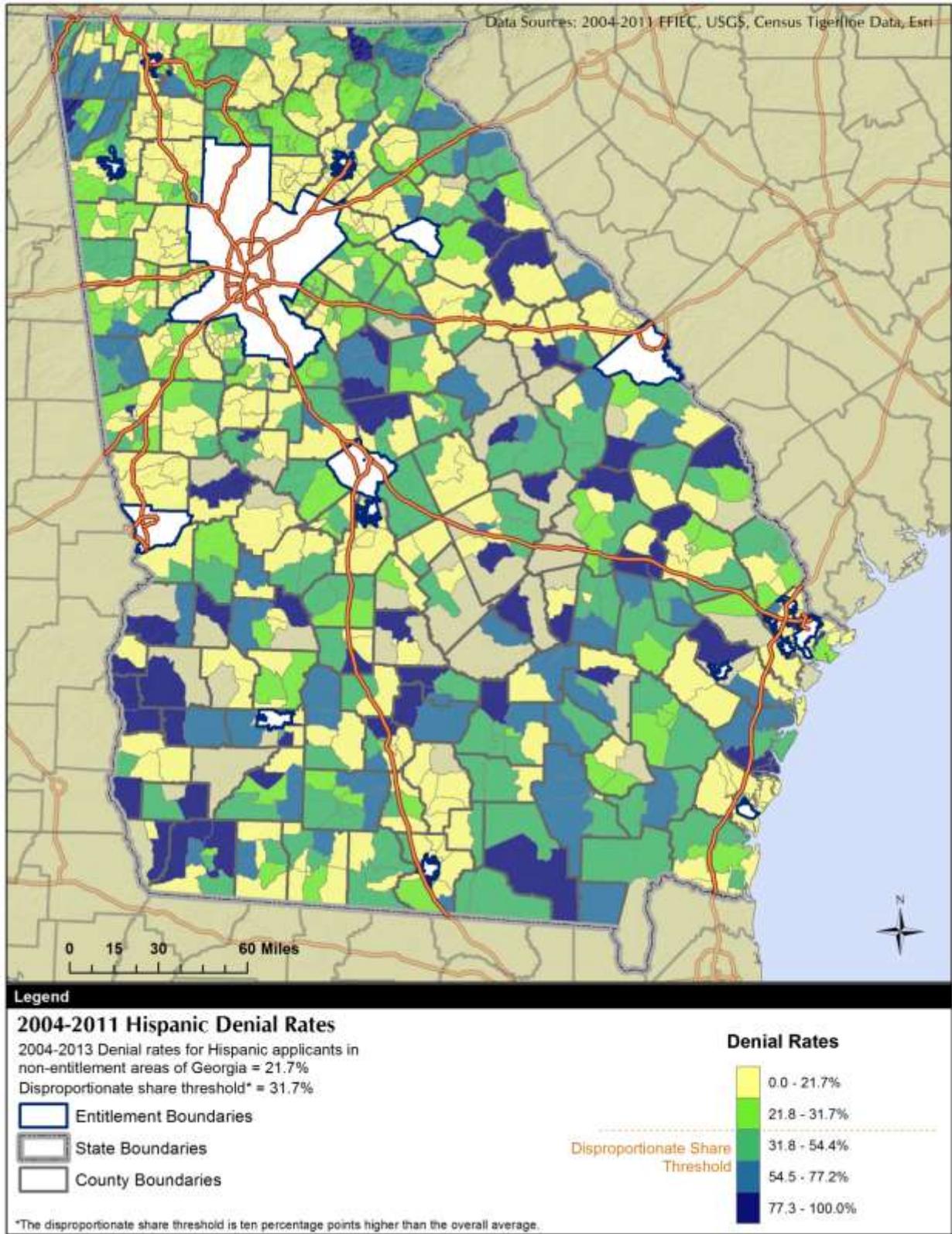


Table V.6
Loan Applications by Reason for Denial
 Non-Entitlement Areas of Georgia
 2004–2013 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Non-Entitlement Areas of Georgia											
Debt-to-Income Ratio	1,829	2,074	2,428	2,308	1,601	1,507	1,511	1,564	1,594	1,587	18,003
Employment History	258	349	445	347	199	199	208	172	207	175	2,559
Credit History	4,183	4,734	4,687	4,438	2,937	2,467	2,800	3,034	3,097	2,494	34,871
Collateral	961	1,323	1,473	1,240	677	749	789	728	808	1,057	9,805
Insufficient Cash	460	471	442	514	335	202	162	206	181	230	3,203
Unverifiable Information	506	855	874	680	371	231	244	229	263	278	4,531
Credit Application Incomplete	825	1,291	1,176	1,135	435	324	402	339	475	509	6,911
Mortgage Insurance Denied	4	3	19	29	35	31	23	12	11	14	181
Other	2,010	2,891	2,366	1,516	628	584	532	498	496	457	11,978
Missing	4,888	5,987	7,234	4,468	2,738	1,506	1,899	2,301	2,921	4,940	38,882
Total	15,924	19,978	21,144	16,675	9,956	7,800	8,570	9,083	10,053	11,741	130,924
Entitled Areas of Georgia											
Debt-to-Income Ratio	2,515	3,150	3,708	3,381	2,215	1,770	1,701	1,472	1,582	1,603	23,097
Employment History	521	705	759	506	254	227	221	190	220	203	3,806
Credit History	4,023	5,243	5,271	4,113	2,223	1,535	1,427	1,570	1,657	1,420	28,482
Collateral	1,673	2,759	2,927	2,551	1,452	1,269	1,262	981	1,227	1,500	17,601
Insufficient Cash	646	537	623	679	453	265	199	195	243	294	4,134
Unverifiable Information	1,487	2,077	2,267	1,742	803	440	409	358	417	432	10,432
Credit Application Incomplete	1,950	2,796	2,452	2,587	976	495	523	472	669	926	13,846
Mortgage Insurance Denied	6	20	21	20	90	49	13	11	15	10	255
Other	3,353	5,219	4,367	3,172	1,130	725	677	560	612	539	20,354
Missing	5,836	8,095	12,506	4,967	2,555	1,241	1,313	1,553	1,662	1,756	41,484
Total	22,010	30,601	34,901	23,718	12,151	8,016	7,745	7,362	8,304	8,683	163,491
State of Georgia											
Debt-to-Income Ratio	4,344	5,224	6,136	5,689	3,816	3,277	3,212	3,036	3,176	3,190	41,100
Employment History	779	1,054	1,204	853	453	426	429	362	427	378	6,365
Credit History	8,206	9,977	9,958	8,551	5,160	4,002	4,227	4,604	4,754	3,914	63,353
Collateral	2,634	4,082	4,400	3,791	2,129	2,018	2,051	1,709	2,035	2,557	27,406
Insufficient Cash	1,106	1,008	1,065	1,193	788	467	361	401	424	524	7,337
Unverifiable Information	1,993	2,932	3,141	2,422	1,174	671	653	587	680	710	14,963
Credit Application Incomplete	2,775	4,087	3,628	3,722	1,411	819	925	811	1,144	1,435	20,757
Mortgage Insurance Denied	10	23	40	49	125	80	36	23	26	24	436
Other	5,363	8,110	6,733	4,688	1,758	1,309	1,209	1,058	1,108	996	32,332
Missing	10,724	14,082	19,740	9,435	5,293	2,747	3,212	3,854	4,583	6,696	80,366
Total	37,934	50,579	56,045	40,393	22,107	15,816	16,315	16,445	18,357	20,424	294,415

As one might expect, denial rates tended to fall as the income of the applicant rose. As shown in Table V.7 on the following page, over 60 percent of loan applications from applicants earning \$15,000 per year or less were denied in the state's non-entitlement areas. Denial rates decreased with entry into higher income brackets, to 12.5 percent for those earning above \$75,000 per year in the state's non-entitlement areas. The same overall trend was observed within the state's entitlement jurisdictions; however, the impact of entry into higher income brackets on the average denial rate was considerably more pronounced at the lower end of the income scale than at the upper end.

Table V.7
Denial Rates by Income of Applicant
 Non-Entitlement Areas of Georgia
 2004–2013 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Non-Entitlement Areas of Georgia											
\$15,000 or Below	55.4%	61.8%	50.0%	60.6%	59.1%	61.4%	63.0%	64.5%	63.9%	73.1%	60.4%
\$15,001–\$30,000	30.8%	34.1%	33.6%	34.7%	35.5%	31.6%	35.7%	36.6%	41.9%	41.2%	35.0%
\$30,001–\$45,000	18.7%	19.7%	21.0%	22.0%	22.3%	20.7%	23.0%	25.0%	26.6%	26.9%	21.8%
\$45,001–\$60,000	14.7%	15.4%	17.0%	18.7%	19.2%	16.5%	18.5%	21.1%	23.5%	22.4%	17.8%
\$60,001–\$75,000	11.4%	12.7%	14.5%	16.1%	15.6%	14.8%	16.8%	17.7%	17.3%	17.5%	14.7%
Above \$75,000	9.6%	11.1%	13.0%	14.5%	12.8%	11.8%	12.7%	13.5%	13.7%	13.7%	12.5%
Data Missing	24.2%	16.2%	17.9%	30.6%	32.5%	49.4%	51.2%	53.7%	61.0%	69.1%	25.1%
Total	17.2%	17.7%	18.3%	20.2%	19.9%	19.3%	22.0%	23.3%	24.6%	24.0%	19.8%
Entitled Areas of Georgia											
\$15,000 or Below	48.1%	62.3%	41.0%	64.3%	65.7%	56.7%	61.3%	64.8%	59.7%	71.0%	57.9%
\$15,001–\$30,000	27.7%	31.1%	31.3%	31.2%	34.3%	27.8%	28.3%	29.2%	30.2%	32.5%	30.2%
\$30,001–\$45,000	18.0%	20.9%	22.8%	23.0%	23.2%	18.1%	20.4%	20.3%	21.4%	21.7%	20.9%
\$45,001–\$60,000	16.0%	18.7%	22.5%	22.1%	20.3%	15.4%	16.7%	17.4%	18.8%	17.1%	19.2%
\$60,001–\$75,000	14.6%	17.8%	21.9%	21.7%	18.5%	13.9%	14.8%	15.9%	15.5%	16.0%	18.1%
Above \$75,000	12.6%	15.5%	18.9%	20.0%	15.9%	12.5%	12.0%	11.9%	12.0%	11.4%	15.4%
Data Missing	26.1%	18.7%	19.7%	40.1%	35.8%	49.5%	45.9%	51.4%	48.4%	28.7%	25.4%
Total	16.5%	18.8%	21.5%	22.6%	20.6%	17.0%	18.1%	18.4%	18.3%	16.9%	19.3%
State of Georgia											
\$15,000 or Below	53.0%	62.0%	46.4%	61.9%	61.8%	59.2%	62.3%	64.6%	62.2%	72.3%	59.4%
\$15,001–\$30,000	29.5%	32.9%	32.7%	33.3%	35.0%	29.8%	32.2%	33.3%	36.7%	37.8%	32.9%
\$30,001–\$45,000	18.3%	20.4%	22.0%	22.5%	22.8%	19.3%	21.7%	22.8%	24.1%	24.7%	21.3%
\$45,001–\$60,000	15.5%	17.4%	20.2%	20.6%	19.8%	15.9%	17.6%	19.4%	21.2%	19.9%	18.5%
\$60,001–\$75,000	13.4%	15.8%	18.9%	19.2%	17.1%	14.3%	15.8%	16.8%	16.4%	16.8%	16.6%
Above \$75,000	11.6%	14.0%	16.8%	17.9%	14.7%	12.2%	12.3%	12.5%	12.7%	12.3%	14.3%
Data Missing	25.4%	17.7%	19.0%	36.3%	34.1%	49.5%	48.2%	52.4%	53.2%	47.1%	25.3%
Total	16.8%	18.4%	20.1%	21.5%	20.3%	18.1%	19.9%	20.8%	21.3%	20.3%	19.5%

In spite of the positive impact of higher applicant incomes on denial rates, discrepancies between black and white loan applicants persisted even when income was taken into consideration, as shown in Table V.8 on the following page. For example, white applicants who earned \$60,000 to \$75,000 per year in the state's non-entitlement jurisdictions were denied at a rate of 12.1 percent, while the denial rate for black applicants who were similarly situated with respect to income was almost twice that figure. Similarly, the denial rate for Hispanic applicants in the same income range was 17 percent, around 3.3 percentage points higher than the denial rate for non-Hispanic applicants in the same income range. The discrepancy in denial rates between white and black applicants in the same income range was even more pronounced in the state's entitlement jurisdictions, while the gap between denial rates for Hispanic and non-Hispanic applicants was smaller.

Table V.8
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 Non-Entitlement Areas of Georgia
 2004–2013 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
Non-Entitlement Areas of Georgia								
American Indian	76.1%	49.7%	35.2%	23.9%	20.7%	21.6%	34.3%	30.4%
Asian	58.0%	32.1%	19.5%	15.2%	12.9%	12.6%	19.3%	16.4%
Black	69.4%	44.9%	29.3%	24.8%	23.2%	24.8%	23.9%	29.8%
White	55.9%	30.2%	18.5%	14.9%	12.1%	9.7%	18.8%	16.3%
Not Available	65.7%	49.8%	31.4%	26.4%	21.0%	17.9%	45.4%	28.2%
Not Applicable	0.0%	35.3%	31.7%	24.4%	21.7%	15.9%	20.8%	24.5%
Average	60.4%	35.0%	21.8%	17.8%	14.7%	12.5%	25.1%	19.8%
Non-Hispanic	58.2%	33.2%	20.3%	16.4%	13.7%	11.7%	20.2%	18.3%
Hispanic	59.6%	28.3%	21.7%	19.0%	17.0%	16.6%	17.2%	21.7%
Entitled Areas of Georgia								
American Indian	69.2%	45.0%	25.8%	27.3%	21.8%	21.6%	23.6%	26.8%
Asian	56.2%	26.2%	18.7%	15.5%	14.6%	13.7%	19.3%	16.5%
Black	64.5%	35.0%	26.3%	26.3%	27.7%	31.2%	27.0%	28.9%
White	52.8%	22.4%	14.1%	12.1%	10.4%	9.0%	15.0%	11.7%
Not Available	53.1%	41.7%	28.2%	24.8%	22.9%	19.2%	46.4%	25.2%
Not Applicable	75.0%	18.4%	34.2%	31.0%	30.4%	22.4%	26.7%	28.3%
Average	57.9%	30.2%	20.9%	19.2%	18.1%	15.4%	25.4%	19.3%
Non-Hispanic	58.0%	28.8%	19.9%	18.1%	17.2%	14.6%	20.8%	18.1%
Hispanic	60.9%	28.0%	20.8%	20.5%	19.2%	19.7%	18.8%	21.6%
State of Georgia								
American Indian	72.9%	47.5%	29.9%	25.9%	21.3%	21.6%	27.8%	28.4%
Asian	56.7%	27.6%	18.9%	15.4%	14.2%	13.4%	19.3%	16.5%
Black	67.0%	39.0%	27.2%	25.9%	26.5%	29.6%	26.2%	29.2%
White	55.1%	27.8%	16.7%	13.7%	11.3%	9.3%	16.9%	14.1%
Not Available	59.7%	45.8%	29.5%	25.4%	22.2%	18.8%	45.9%	26.3%
Not Applicable	50.0%	29.2%	33.3%	29.2%	28.3%	20.2%	23.6%	26.8%
Average	59.4%	32.9%	21.3%	18.5%	16.6%	14.3%	25.3%	19.5%
Non-Hispanic	58.1%	31.4%	20.1%	17.3%	15.6%	13.5%	20.6%	18.2%
Hispanic	60.3%	28.1%	21.1%	20.0%	18.5%	18.7%	18.2%	21.6%

High-Cost Home Loans

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;⁶²
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 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.⁶³

⁶² 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>

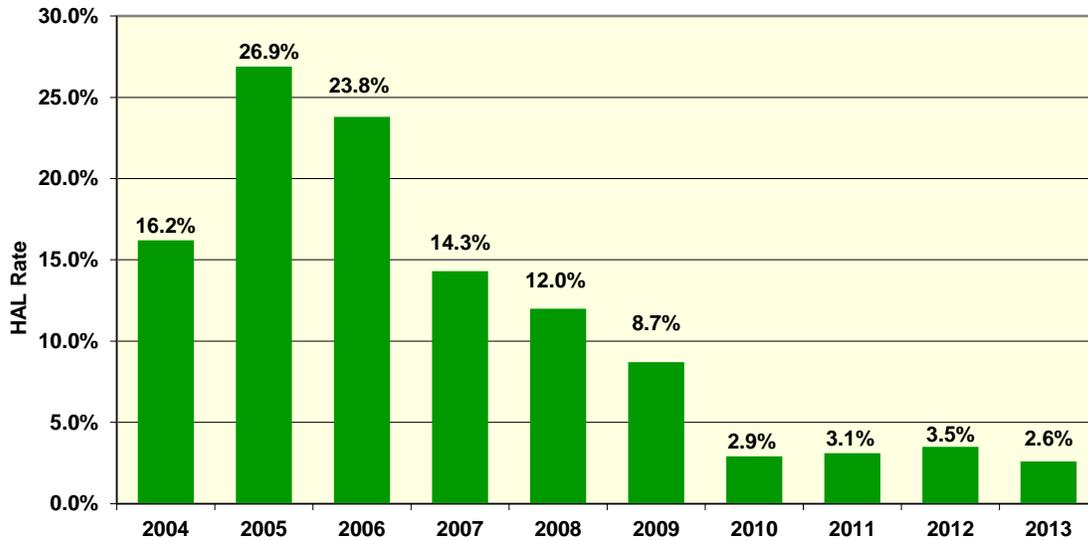
⁶³ 12 CFR Part 203, http://www.ffiec.gov/hmda/pdf/regc_020702.pdf

Many of those who were able to secure a home purchase loan were often issued loans with relatively high annual percentage rates (HALs). As shown in Table V.9 below, some 15.2 percent of owner-occupied home purchase loans in the state’s non-entitlement areas were HALs, compared to a HAL rate of 15.9 percent in the state’s entitlement jurisdictions. Unlike home purchase loan denials, the incidence of HALs in the state’s non-entitlement areas has declined considerably in recent years, from 26.9 percent in 2005 to 2.9 percent in 2010, as shown in Diagram V.3 below.

Table V.9
Originated Owner-Occupied Loans by HAL Status
 Non-Entitlement Areas of Georgia
 2004–2013 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Non-Entitlement Areas of Georgia											
Other	64,411	67,892	71,929	56,601	35,147	29,832	29,564	28,926	29,734	36,255	450,291
HAL	12,432	24,962	22,525	9,466	4,807	2,852	870	933	1,080	961	80,888
Total	76,843	92,854	94,454	66,067	39,954	32,684	30,434	29,859	30,814	37,216	531,179
Percent HAL	16.2%	26.9%	23.8%	14.3%	12.0%	8.7%	2.9%	3.1%	3.5%	2.6%	15.2%
Entitled Areas of Georgia											
Other	94,239	91,700	92,747	70,710	43,355	37,561	34,874	32,435	36,838	42,550	577,009
HAL	17,022	40,133	35,040	10,701	3,520	1,554	193	209	224	177	108,773
Total	111,261	131,833	127,787	81,411	46,875	39,115	35,067	32,644	37,062	42,727	685,782
Percent HAL	15.3%	30.4%	27.4%	13.1%	7.5%	4.0%	0.6%	0.6%	0.6%	0.4%	15.9%
State of Georgia											
Other	158,650	159,592	164,676	127,311	78,502	67,393	64,438	61,361	66,572	78,805	1,027,300
HAL	29,454	65,095	57,565	20,167	8,327	4,406	1,063	1,142	1,304	1,138	189,661
Total	188,104	224,687	222,241	147,478	86,829	71,799	65,501	62,503	67,876	79,943	1,216,961
Percent HAL	15.7%	29.0%	25.9%	13.7%	9.6%	6.1%	1.6%	1.8%	1.9%	1.4%	15.6%

Diagram V.3
HAL Rates by Year
 Non-Entitlement Areas of Georgia
 2004–2013 HMDA Data



Geographic trends in the distribution of these high-cost HALs were similar to trends in home loan denials, as shown in Map V.5 on page 92. Those who were able to secure an owner-occupied home purchase loan in areas in and around the state’s urban areas were less likely to be issued HALs than their rural counterparts. These high-cost loans accounted for larger

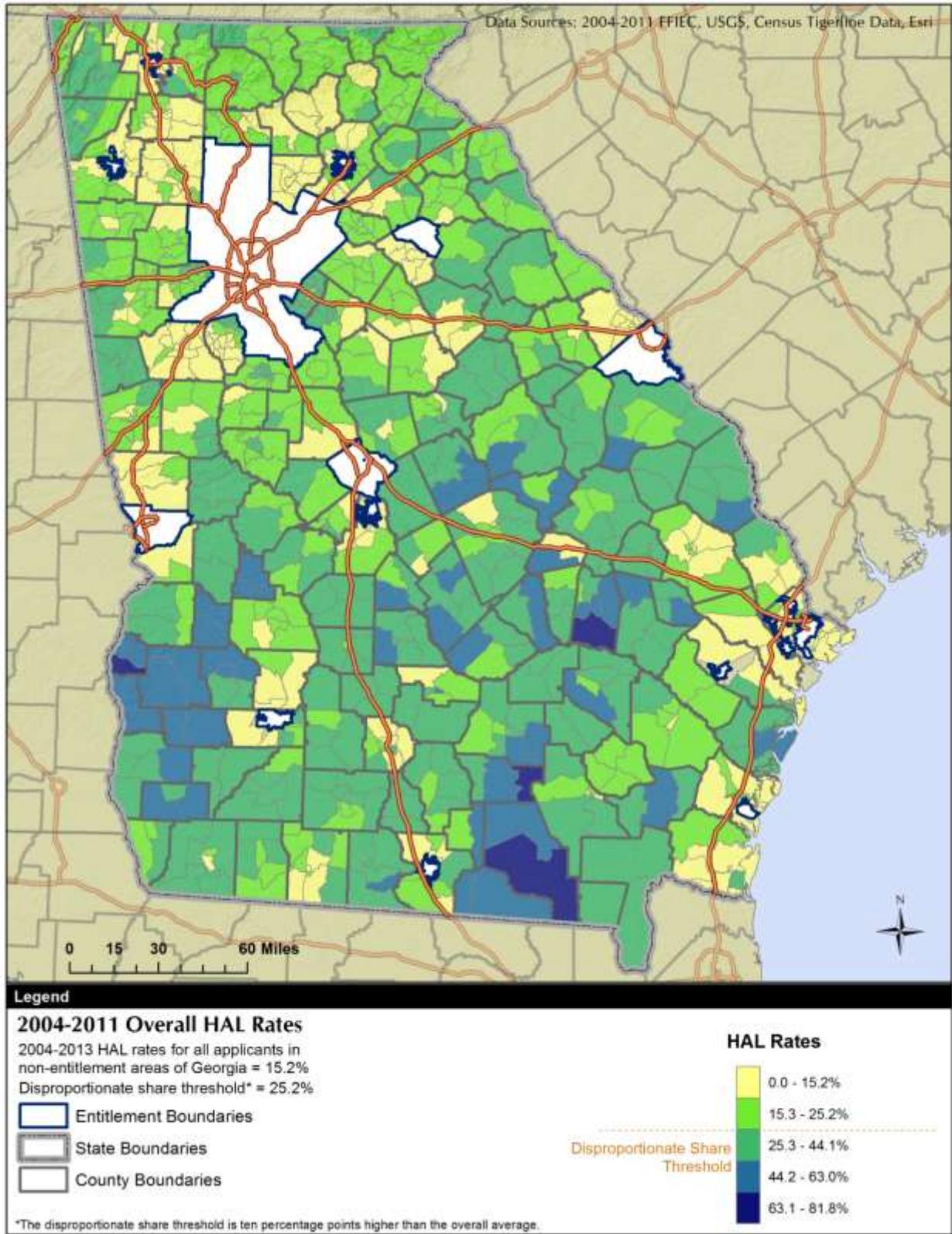
percentages of home purchase loans issued in rural Census tracts throughout the state from 2004 through 2011. The same was true in 2012 and 2013, as shown in Map V.6 on page 93. However, as had been the case with home loan denials, HALs came to account for a larger percentage of home purchase loans in Census tracts surrounding the state’s urban areas after 2011. In both years, Census tracts with greater numbers of home loan applications and loans tended to have lower HAL rates.

In keeping with trends in home purchase loan denials, black and Hispanic borrowers were more likely to be issued these high-cost loans than white and non-Hispanic borrowers, respectively. As shown in Table V.10 below, the HAL rate for black borrowers in the state’s non-entitlement areas was 28.2 percent, more than twice the HAL rate for white residents. The HAL rate for Hispanic borrowers in the state’s non-entitlement areas, at 18.8 percent, exceeded that of non-Hispanic residents by four percentage points. Similar trends were observed in the state’s entitlement areas, where the discrepancy between white and black borrowers was considerably more pronounced, as was the discrepancy between Hispanic and non-Hispanic residents.

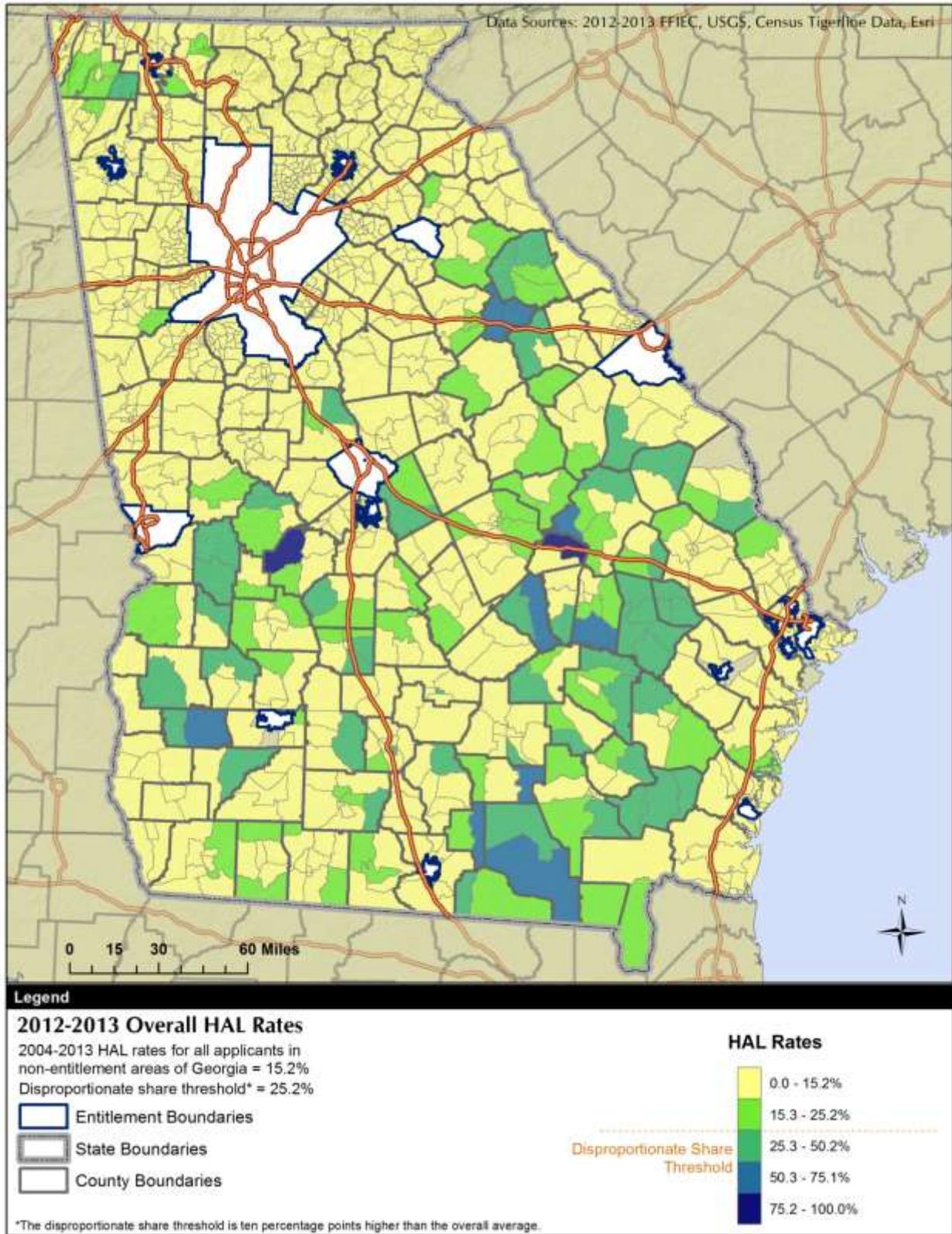
Table V.10
Rate of HALs Originated by Race/Ethnicity of Borrower
 Non-Entitlement Areas of Georgia
 2004–2013 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Average
Non-Entitlement Areas of Georgia											
American Indian	21.6%	29.4%	31.0%	13.5%	11.6%	9.5%	5.7%	4.3%	2.4%	5.2%	18.5%
Asian	9.5%	17.6%	14.5%	7.0%	7.4%	5.7%	1.5%	0.5%	0.6%	0.7%	8.2%
Black	30.1%	49.0%	43.2%	23.8%	13.4%	9.1%	3.2%	3.4%	4.5%	3.9%	28.2%
White	13.6%	21.0%	19.1%	12.6%	12.6%	9.5%	3.1%	3.3%	3.5%	2.5%	12.7%
Not Available	15.7%	35.0%	26.2%	14.4%	6.2%	2.9%	0.7%	2.0%	3.4%	1.7%	16.5%
Not Applicable	6.6%	0.0%	5.6%	11.1%	21.4%	0.0%	0.0%	0.0%	0.0%	0.0%	6.5%
Average	16.2%	26.9%	23.8%	14.3%	12.0%	8.7%	2.9%	3.1%	3.5%	2.6%	15.2%
Non-Hispanic	16.4%	25.6%	23.2%	14.2%	12.4%	9.3%	2.9%	3.0%	3.0%	2.3%	14.8%
Hispanic	17.9%	31.7%	29.8%	16.1%	13.1%	7.1%	3.7%	1.9%	4.1%	1.8%	18.8%
Entitled Areas of Georgia											
American Indian	18.2%	32.8%	26.7%	14.4%	5.1%	3.5%	0.0%	1.1%	2.5%	1.5%	18.0%
Asian	7.4%	16.9%	15.0%	6.5%	4.3%	2.4%	0.5%	0.3%	0.1%	0.1%	7.8%
Black	29.3%	51.6%	46.8%	23.7%	11.4%	6.7%	0.2%	0.4%	0.5%	0.4%	30.1%
White	8.7%	17.6%	16.3%	8.4%	6.1%	3.3%	0.8%	0.8%	0.7%	0.5%	9.2%
Not Available	15.9%	33.6%	27.7%	12.7%	6.2%	2.5%	0.1%	0.4%	0.4%	0.3%	16.2%
Not Applicable	8.9%	7.7%	14.3%	10.0%	20.0%	0.0%	0.0%	0.0%	0.0%	0.0%	9.0%
Average	15.3%	30.4%	27.4%	13.1%	7.5%	4.0%	0.6%	0.6%	0.6%	0.4%	15.9%
Non-Hispanic	15.2%	29.1%	26.5%	12.6%	7.1%	4.1%	0.6%	0.6%	0.6%	0.4%	15.3%
Hispanic	15.5%	37.8%	37.1%	19.6%	17.3%	6.0%	0.3%	1.1%	1.1%	0.3%	22.2%
State of Georgia											
American Indian	19.4%	31.6%	28.5%	13.9%	8.3%	6.5%	2.8%	2.7%	2.5%	3.1%	18.2%
Asian	7.8%	17.1%	14.9%	6.6%	5.1%	3.2%	0.7%	0.3%	0.3%	0.3%	7.9%
Black	29.5%	50.9%	45.7%	23.7%	12.0%	7.5%	1.2%	1.4%	1.7%	1.6%	29.5%
White	11.1%	19.3%	17.7%	10.6%	9.7%	6.6%	2.0%	2.1%	2.1%	1.5%	11.0%
Not Available	15.8%	34.1%	27.1%	13.3%	6.2%	2.7%	0.3%	1.0%	1.5%	0.8%	16.3%
Not Applicable	8.0%	3.6%	9.4%	10.7%	20.7%	0.0%	0.0%	0.0%	0.0%	0.0%	8.0%
Average	15.7%	29.0%	25.9%	13.7%	9.6%	6.1%	1.6%	1.8%	1.9%	1.4%	15.6%
Non-Hispanic	15.7%	27.6%	25.1%	13.3%	9.6%	6.5%	1.7%	1.8%	1.7%	1.3%	15.1%
Hispanic	16.2%	35.8%	34.5%	18.4%	15.8%	6.4%	1.6%	1.4%	2.1%	0.9%	21.0%

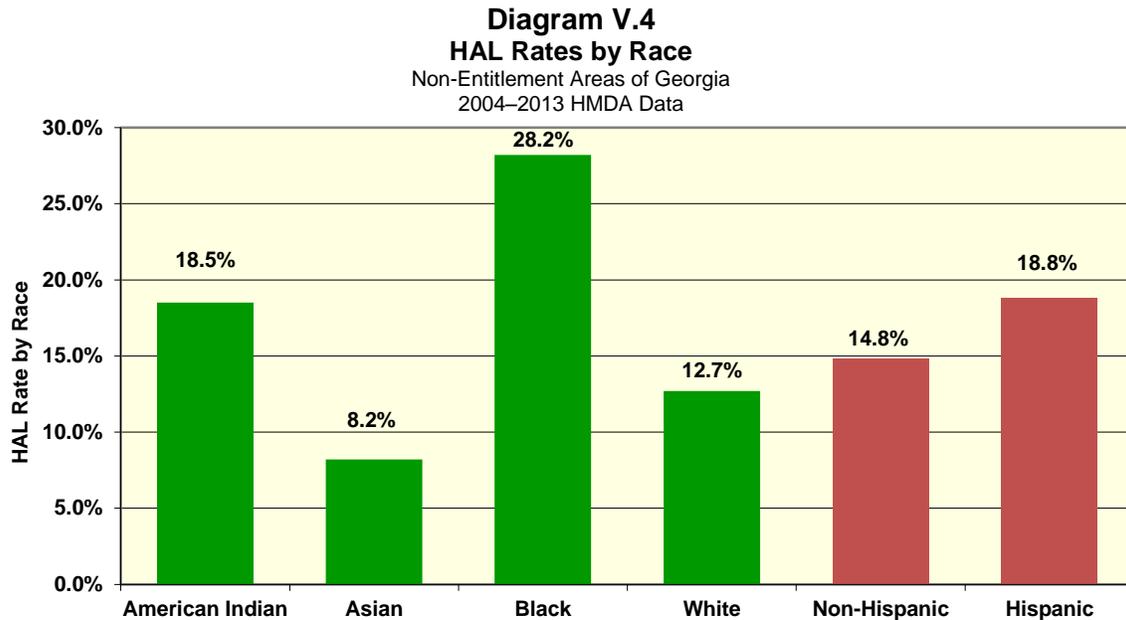
Map V.5
Rate of HALs by Census Tract, 2004-2011
 Non-Entitlement Areas of Georgia
 2004-2011 HMDA Data



Map V.6
Rate of HALs by Census Tract, 2012-2013
 Non-Entitlement Areas of Georgia
 2012-2013 HMDA Data



Overall HAL rates in the state’s non-entitlement areas are presented by race and ethnicity in Diagram V.4 below.



Trends in high-cost loans for black borrowers were also similar to trends in denial rates for black residents. As shown in Map V.7 on the following page, HALs accounted for a larger percentage of home purchase loans issued to black residents in the state’s rural areas than was typical in areas closer to the state’s urban centers.

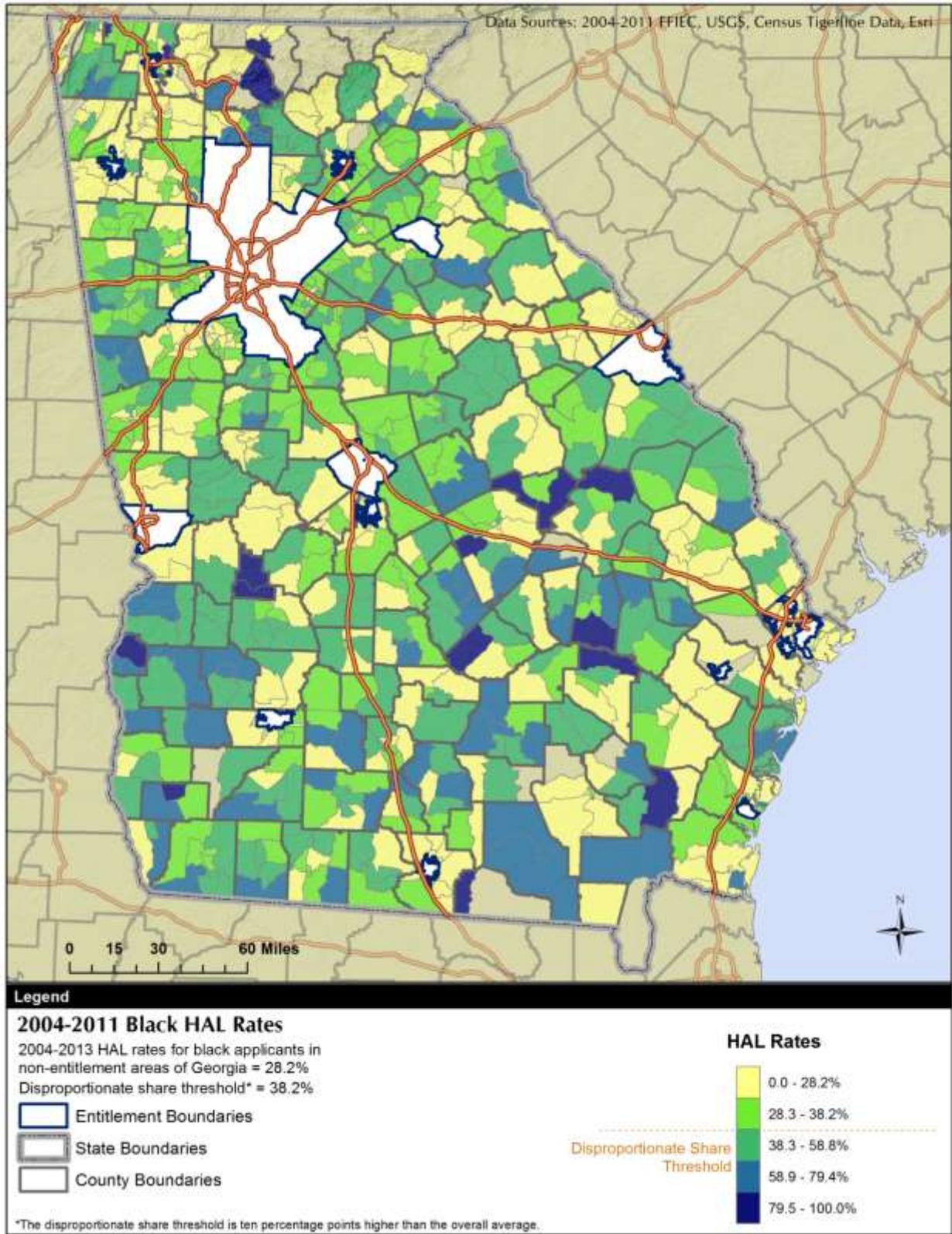
Hispanic residents were also less likely to be issued HALs in and around the Atlanta metropolitan area than elsewhere in the state, as shown in Map V.8 on page 96. However, the number of loans, high-cost or otherwise, issued in that area tended to be considerably higher than in the state’s non-entitlement areas overall. HAL rates tended to fall as the number of loan applications submitted by Hispanic borrowers increased.

COMMUNITY REINVESTMENT ACT DATA

The economic vitality of neighborhoods can partly be measured through Community Reinvestment Act (CRA) data, which detail the distribution of small business loans throughout the state. These loans were analyzed to determine the location of funding by Census tract and income level. Census tracts in which the MFI is 50 percent of the area MFI or less are considered low-income Census tracts; those in which the MFI ranges from 50.1 to 80 percent of the area MFI are considered moderate income Census tracts. Tables with complete CRA data are presented in Appendix A.

Small business loans were more likely to be issued in middle- to high-income Census tracts, where the median family income was 80.1 percent of the area MFI or more. As shown in Diagram V.5 on page 97, very few small business loans were issued in low-income Census tracts, and less than fifteen percent were issued in moderate-income tracts. By contrast, more than half of all small business loans were issued in middle-income Census tracts, and roughly a quarter went to high-income Census tracts.

Map V.7
HALs to Black Applicants by Census Tract, 2004-2011
 Non-Entitlement Areas of Georgia
 2004-2011 HMDA Data



Map V.8
HALs to Black Applicants by Census Tract, 2004-2011
 Non-Entitlement Areas of Georgia
 2004-2011 HMDA Data

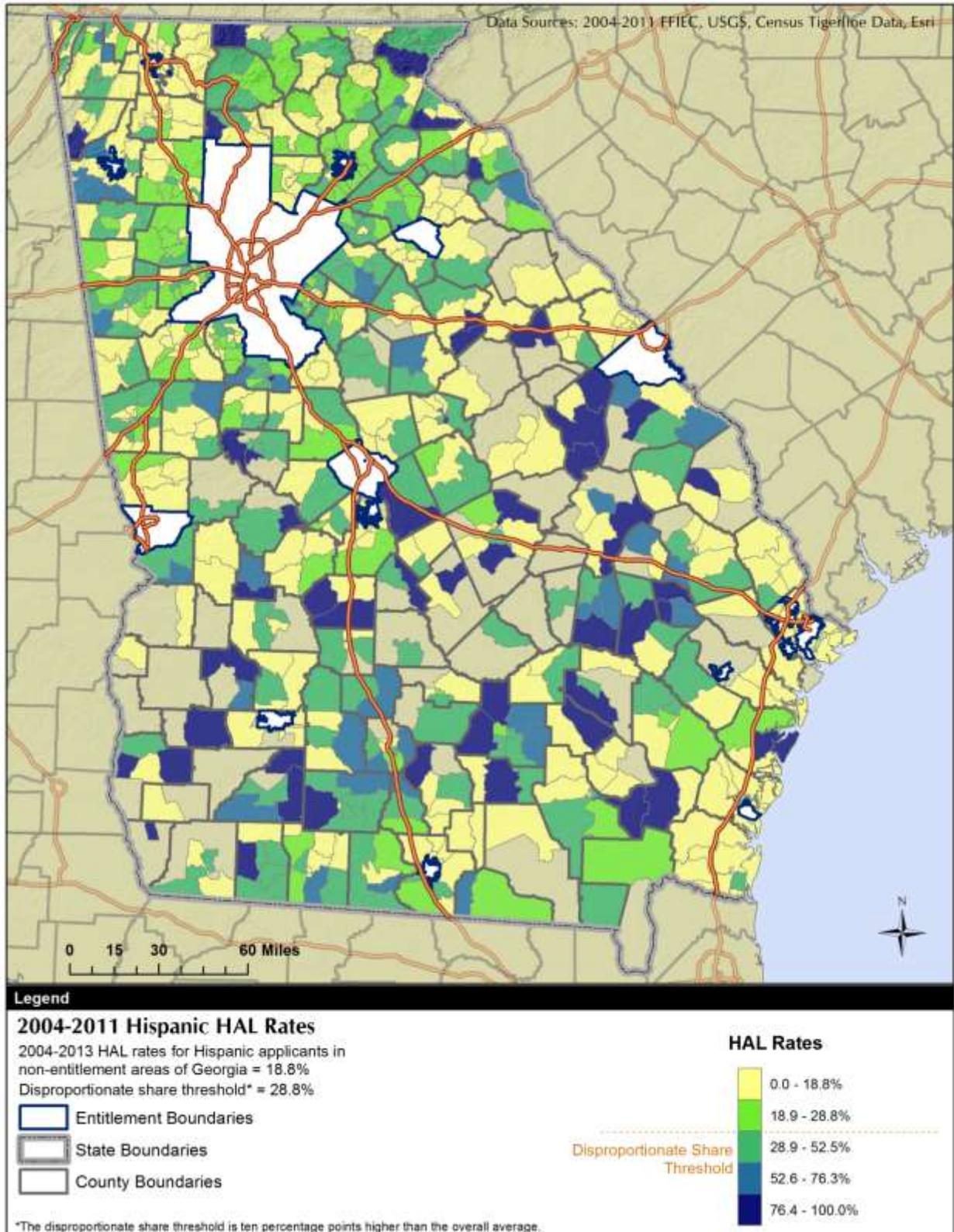
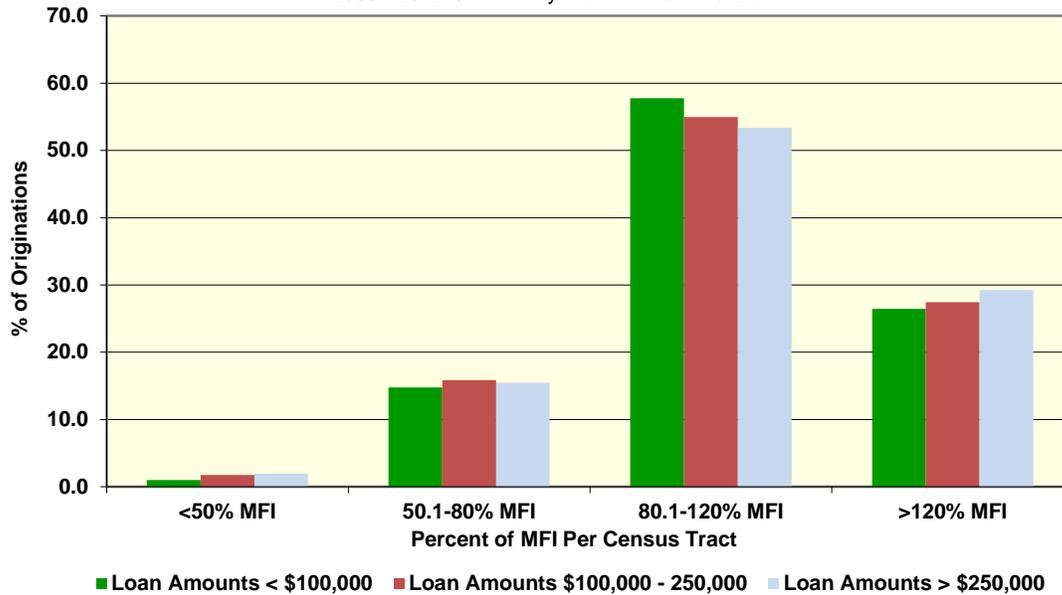


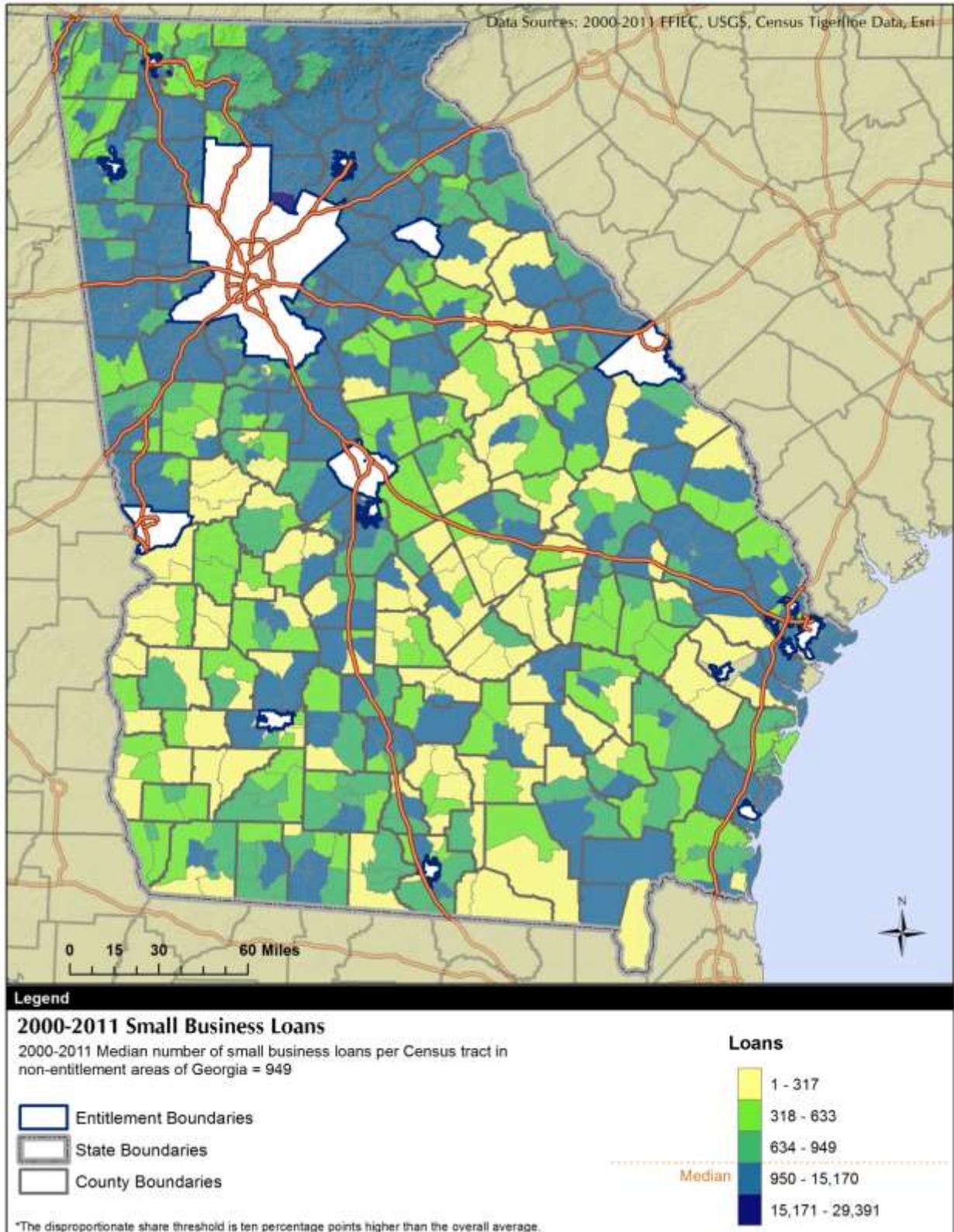
Diagram V.5
Percent of Small Business Loans Originated by Census Tract MFI
 Non-Entitlement Areas of Georgia
 2000 - 2012 Community Reinvestment Act Data



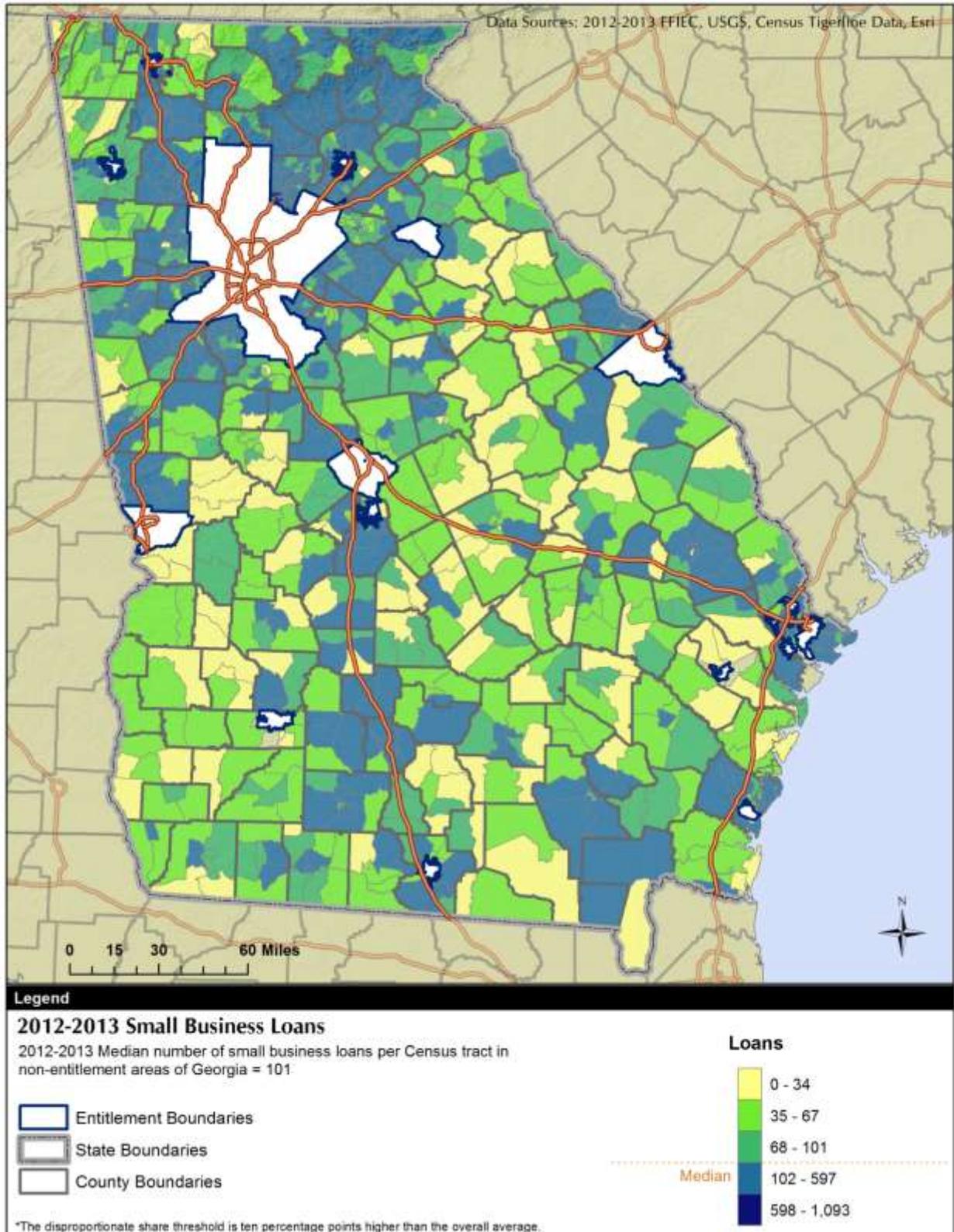
These trends were borne out in geographic patterns in small business lending throughout the state. As shown in Map V.9 on the following page, northern Census tracts tended to host considerably more small business lending activity than southern Census tracts, with the exception of Census tracts in the extreme northwest of the state. The number of small business loans issued in the area surrounding the Atlanta metropolitan area was generally above the overall median for the state’s non-entitlement areas, with the greatest number of loans appearing in a large Census tract to the immediate northeast of the city. By contrast, the number of loans issued in the state’s southern Census tracts, where poverty rates were relatively high, tended to be well below the overall median. A similar trend was observed in 2012-2013, as shown in Map V.10 on page 99.

As one might expect, Census tracts with greater numbers of loans also tended to receive more loan dollars from 2000 through 2011, as shown in Map V.11 on page 100. The median value of loans issued per Census tract in the state’s non-entitlement areas as a whole was \$29,744. As with the number of small business loans, the total value of small business loans from 2000 through 2011 tended to be above-median in Census tracts surrounding the Atlanta metropolitan area, and were highest to the immediate northeast of the city. As before, the total value of loans issued in southern, inland Census tracts from 2000 through 2011 tended to be well below the overall median. Similar geographic patterns in the distribution of loan dollars were observed in the period after 2011, as shown in Map V.12 on page 101.

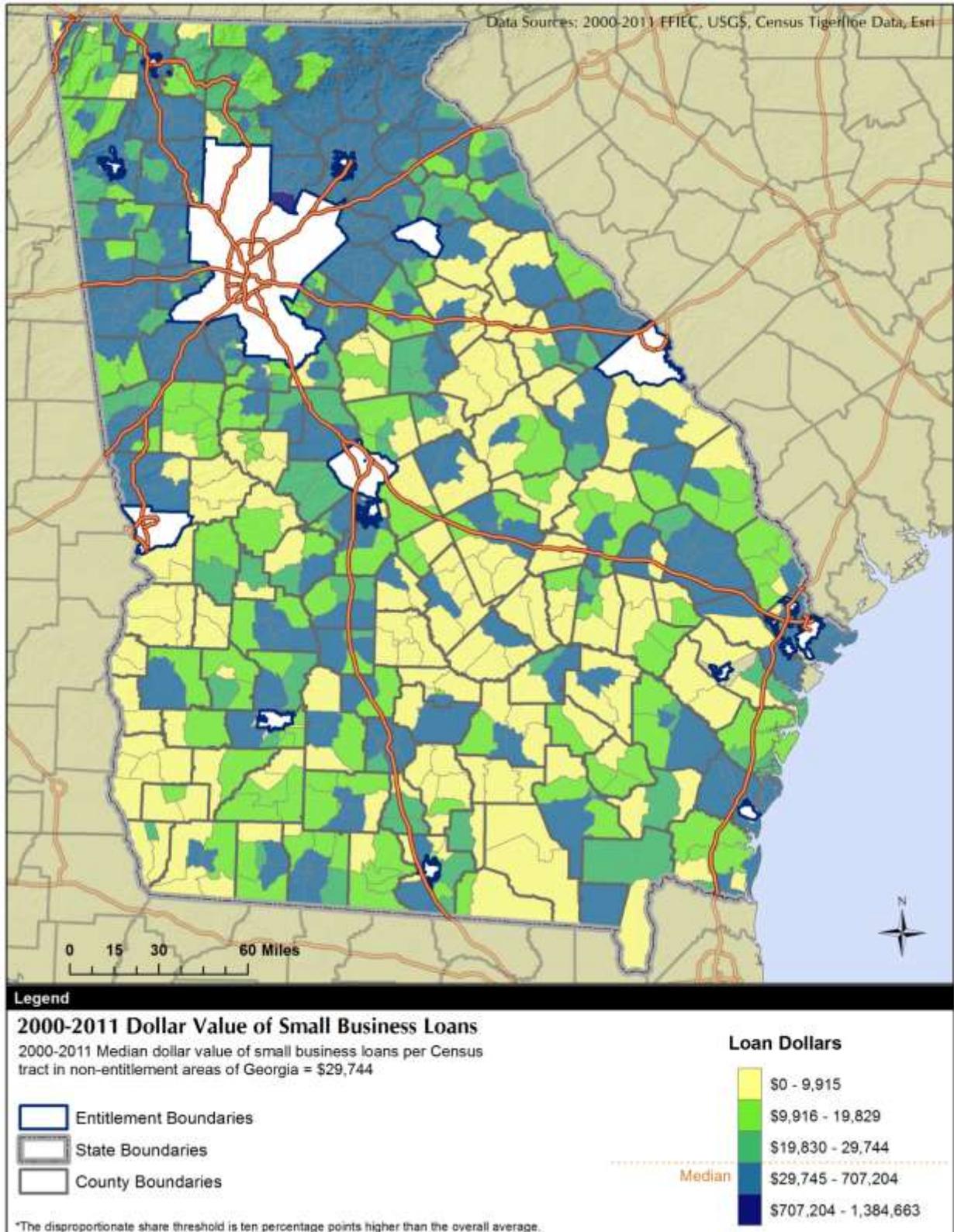
Map V.9
Number of Small Business Loans, 2000-2011
 Non-Entitlement Areas of Georgia
 2000-2011 CRA Data



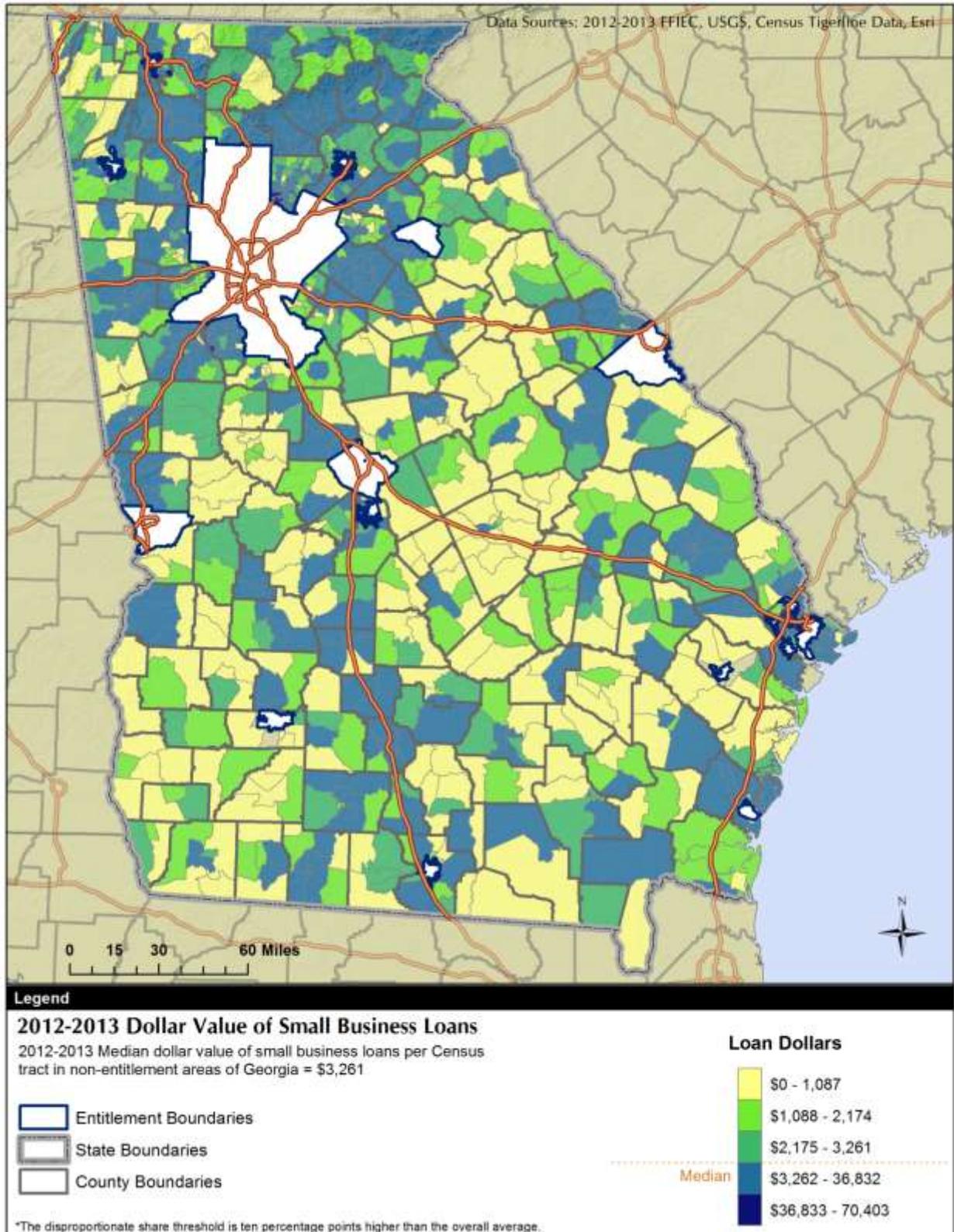
Map V.10
Number of Small Business Loans, 2012-2013
 Non-Entitlement Areas of Georgia
 2012-2013 CRA Data



Map V.11
Amount of Small Business Loan Dollars, 2000-2011
 Non-Entitlement Areas of Georgia
 2000-2011 CRA Data



Map V.12
Amount of Small Business Loan Dollars, 2012-2013
 Non-Entitlement Areas of Georgia
 2012-2013 CRA Data



FAIR HOUSING COMPLAINTS

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

The U.S. Department of Housing and Urban Development maintains records of complaints that represent potential or actual violations of fair housing law. As shown in Table V.11.A below, residents of the state's non-entitlement areas lodged 535 complaints with HUD from 2004 through 2014, the most recent year for which complaint data were available at the outset of the 2016 AI process. Perceived discrimination on the basis of race was most common, figuring in 308 complaints over the time period, or nearly 58 percent. The next most common complaint alleged discrimination on the basis of disability, cited in over 37 percent of complaints. Sexual discrimination was cited in 15.5 percent of complaints, and national origin figured in around 14 percent. More than one basis may be cited in a single complaint: accordingly, 782 bases were cited in connection to the 535 complaints filed with HUD over the decade.

Table V.11.A
Fair Housing Complaints by Basis
 Non-Entitlement Areas of Georgia
 2004–2014 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	Total
Race	42	30	33	25	43	46	27	7	12	25	18	308
Disability	17	22	22	25	32	31	27	5	6	5	8	200
Sex	12	14	9	7	11	15	6	3	3	2	1	83
National Origin	2	4	1	4	22	4	1	4	9	5	17	73
Family Status	5	7	8	6	13	9	8	3	2	3	2	66
Retaliation				2	5	1	1	2	4	17	2	34
Color		1	1	2	1	3	1			1		10
Religion			1	1	5			1				8
Total Bases	78	78	75	72	132	109	71	25	36	58	48	782
Total Complaints	58	46	51	54	106	67	48	18	24	34	29	535

Complaint data from entitlement jurisdictions throughout the state present a similar picture: as shown in Table V.11.B below, over half of the complaints filed with HUD from within the state's entitlement areas were related to perceived discrimination based on race. Disability was the second most common complaint basis, followed by sex.

Table V.11.B
Fair Housing Complaints by Basis
 Entitlement Areas of Georgia
 2004–2014 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	Total
Race	67	65	112	98	126	75	130	35	36	20	12	776
Disability	47	33	70	65	88	63	76	29	19	21	22	533
Sex	18	15	36	38	62	36	37	12	9	6	5	274
Family Status	16	19	21	17	34	20	34	9	10	7	3	190
National Origin	8	25	22	29	24	16	20	12	12	8	2	178
Retaliation	2	7	8	3	5	8	4	4	10	9	5	65
Color		2	4	3	16	8	6	2	5	3	1	50
Religion	1	4	6	3	12	6	8	4			1	45
Total Bases	159	170	279	256	367	232	315	107	101	74	51	2,111
Total Complaints	120	117	196	166	215	142	210	79	66	53	39	1,403

Complainants may also cite more than one discriminatory *issue*, or alleged discriminatory action or practice. Indeed, the non-entitlement residents who filed the 535 complaints with HUD cited 956 discriminatory issues in connection with those complaints, as shown in Table V.12.A below. The most common discriminatory practices alleged in these complaints included the following (number of complaints in parentheses):

- Discriminatory terms, conditions, privileges, or services and facilities (175 complaints);
- Discrimination in terms, conditions, or privileges relating to rental (162 complaints);
- Failure to make reasonable accommodation (98 complaints); and
- Discriminatory acts under Section 818 (88 complaints).

Under Section 818 of the Fair Housing Act, housing providers are prohibited from taking any coercive measures designed to prevent potential complainants from exercising their housing rights; i.e., through threats to evict in retaliation for potential fair housing complaints

In more than half of these complaints, an investigation by HUD did not produce sufficient evidence to conclude that discrimination had occurred, or was about to occur. Some 270 complaints ended with a “no cause” determination, as shown in Table V.13.A on the following page, while 79 complaints ended with a conciliation agreement or settlement. These latter complaints; along with the 51 that were withdrawn after resolution, and the one in which discrimination was found; are considered for the purposes of this analysis to have cause.

Table V.12.A
Fair Housing Complaints by Issue
 Non-Entitlement Areas of Georgia
 2004–2014 HUD Data

Issue	Total
Discriminatory terms, conditions, privileges, or services and facilities	175
Discrimination in term, conditions or privileges relating to rental	162
Failure to make reasonable accommodation	98
Discriminatory acts under Section 818 (coercion, etc.)	88
Discriminatory refusal to rent	76
Other discriminatory acts	48
Otherwise deny or make housing available	43
Discriminatory financing (includes real estate transactions)	31
Discriminatory advertising, statements and notices	24
Refusing to provide municipal services or property	22
False denial or representation of availability - rental	21
Discrimination in terms, conditions, privileges relating to sale	20
Discrimination in services and facilities relating to rental	15
Discrimination in the appraising of residential real property	14
Failure to permit reasonable modification	14
Discriminatory refusal to rent and negotiate for rental	13
Discriminatory refusal to sell	12
Discrimination in the terms or conditions for making loans	11
Discriminatory refusal to sell and negotiate for sale	9
Steering	9
Discrimination in making of loans	7
Using ordinances to discriminate in zoning and land use	7
Discriminatory refusal to negotiate for rental	6
False denial or representation of availability - sale	5
Discriminatory refusal to negotiate for sale	4
False denial or representation of availability	4
Discrimination in services and facilities relating to sale	3
Non-compliance with design and construction requirements (handicap)	3
Discriminatory advertisement - rental	2
Blockbusting - rental	1
Discrimination in the selling of residential real property	1
Discrimination in the brokering of residential real property	1
Discriminatory brokerage service	1
Discrimination in terms and conditions of membership	1
Restriction of choices relative to a sale	1
Adverse action against an employee	1
Failure to provide an accessible building entrance	1
Failure to provide an accessible route into and thru the covered unit	1
Other non-compliance with design and construction requirements	1
Total Issues	956
Total Complaints	535

Table V.13.A
Fair Housing Complaints by Closure Status
 Non-Entitlement Areas of Georgia
 2004–2014 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	Total
No Cause	36	25	22	28	43	25	16	9	17	25	24	270
Conciliated / Settled	7	7	14	9	25	1	2	2	5	6	1	79
Complainant Failed to Cooperate	5	2	5	7	12	17	19	1		1		69
Withdrawal After Resolution	7	7	2	3	11	10	5	4	1		1	51
Withdrawal Without Resolution		1	3	2	9	6	2	2		2	1	28
Lack of Jurisdiction	1	1	3	2	2	5	2		1		1	18
Unable to Locate Respondent	1	3	2	2	4	2	1				1	16
Untimely Filed				1								1
DOJ Dismissal	1											1
Unable to Identify Respondent							1					1
Litigation Ended – Discrimination Found						1						1
Total Complaints	58	46	51	54	106	67	48	18	24	34	29	535

A smaller proportion of complaints from the state’s entitlement areas were found to be without cause, or just under half. As shown in Table V.13.B below, 173 complaints were conciliated or settled, and 116 were withdrawn after resolution.

Table V.13.B
Fair Housing Complaints by Closure Status
 Entitlement Areas of Georgia
 2004–2014 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	Total
No Cause	76	77	108	87	97	62	66	43	31	32	19	698
Complainant Failed to Cooperate	6	3	31	18	39	32	56	12	7	1	1	206
Conciliated / Settled	18	17	17	16	23	16	18	8	16	14	10	173
Withdrawal After Resolution	10	4	3	16	16	13	23	10	8	6	7	116
Withdrawal Without Resolution	4	7	16	7	15	5	14	2	2		2	74
Lack of Jurisdiction	1	2	11	8	10	8	15	1	2			58
Unable to Locate Respondent	1	3	3	12	9	6	18	1				53
Election Made to Go to Court		3	3					1				7
Untimely Filed			2	1	1							4
FHAP Judicial Dismissal	4											4
DOJ Dismissal					2			1				3
Unable to Identify Respondent					3							3
FHAP Judicial Consent Order		1		1								2
Trial has Begun			2									2
Total Complaints	120	117	196	166	215	142	210	79	66	53	39	1,403

As had been the case with fair housing complaints overall, race was the most common alleged motivation for discrimination cited in complaints considered to have cause, followed by disability. As shown in Table V.14.A on the following page, race was cited as the basis for 64 complaints filed with HUD by residents from the state’s non-entitlement areas, and disability figured in 58 complaints. Each was cited in more than 44 percent of complaints considered to have cause.

Table V.14.A
Fair Housing Complaints Found With Cause by Basis
 Non-Entitlement Areas of Georgia
 2004–2014 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	Total
Race	11	7	12	5	12	7	2	1	4	3		64
Disability	4	9	6	7	9	7	6	2	3	3	2	58
Family Status	1	3	4	2	5	1	1	1				18
National Origin					12			2				14
Sex	2	1	1	1	2	3	1	2				13
Retaliation					3	1		1	1	1		7
Color						1						1
Religion					1							1
Total Bases	18	20	23	15	44	20	10	9	8	7	2	176
Total Complaints	14	14	16	12	36	12	7	6	6	6	2	131

Unlike in the state’s non-entitlement areas, the most common basis for complaints considered to have cause in the state’s entitlement jurisdictions was disability, as shown in Table V.14.B below. Around 46.7 percent of complaints considered to have cause cited disability as the perceived motivation for discrimination or protected class affected by discrimination, followed by the 127 who cited race, or 43.9 percent.

Table V.14.B
Fair Housing Complaints Found With Cause by Basis
 Entitlement Areas of Georgia
 2004–2014 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	Total
Disability	12	7	12	16	17	12	19	11	7	10	12	135
Race	12	11	12	19	19	14	19	3	9	7	2	127
Sex	5	1	4	6	8	8	4	1	5	1	1	44
Family Status	2	5	1		8	3	7	3	8	4	1	42
National Origin	2	2		6	6	1	6	2	2	4		31
Color					2	2	2		2	1	1	10
Retaliation			1			2	1	1	2	2	1	10
Religion	1	1			3	1	2					8
Total Bases	34	27	30	47	63	43	60	21	35	29	18	407
Total Complaints	28	21	20	32	39	29	41	18	24	20	17	289

Once again, the discriminatory issues cited in connection with complaints that were considered to have cause were similar to those cited in complaints overall. As shown in Table V.15.A on the following page, the most common discriminatory issues cited in these complaints included the following:

- Discrimination in terms, conditions, or privileges relating to rental, cited in 39 complaints;
- Discriminatory terms, conditions, privileges, or services and facilities, along with failure to make reasonable accommodation, both cited in 33 complaints; and
- Discriminatory refusal to rent, which was cited in 20 complaints.

Table V.15.A
Fair Housing Complaints Found With Cause by Issue
 Non-Entitlement Areas of Georgia
 2004–2014 HUD Data

Issue	Total
Discrimination in term, conditions or privileges relating to rental	39
Discriminatory terms, conditions, privileges, or services and facilities	33
Failure to make reasonable accommodation	33
Discriminatory refusal to rent	20
Discriminatory acts under Section 818 (coercion, etc.)	15
Other discriminatory acts	14
Discriminatory financing (includes real estate transactions)	7
Discrimination in services and facilities relating to rental	7
Discriminatory advertising, statements and notices	6
Otherwise deny or make housing available	6
Failure to permit reasonable modification	6
False denial or representation of availability - rental	5
Discrimination in terms, conditions, privileges relating to sale	5
Steering	3
False denial or representation of availability	2
Discrimination in making of loans	2
Discriminatory refusal to sell	1
Discriminatory refusal to negotiate for sale	1
Discriminatory refusal to sell and negotiate for sale	1
Discriminatory refusal to negotiate for rental	1
Discriminatory refusal to rent and negotiate for rental	1
Discrimination in the terms or conditions for making loans	1
Discrimination in services and facilities relating to sale	1
Adverse action against an employee	1
Using ordinances to discriminate in zoning and land use	1
Non-compliance with design and construction requirements (handicap)	1
Total Issues	213
Total Complaints	131

The predominant discriminatory issues in complaints from the state’s entitlement jurisdictions that were considered to have cause were also similar to complaints from those areas overall. As shown in Table V.15.B on the following page, the three most common discriminatory practices cited in complaints filed with HUD included the following:

- Discrimination in terms, conditions, or privileges relating to rental, cited in 99 complaints;
- Failure to make reasonable accommodation, cited in 84 complaints; and
- Discriminatory terms, conditions, privileges, or services and facilities, cited in 74 complaints.

GEORGIA COMMISSION ON EQUAL OPPORTUNITY COMPLAINTS

As noted above, the Georgia Commission on Equal Opportunity (GCEO) also accepts complaints from Georgia residents who believe that they have been subjected to unlawful discrimination in the housing market. The GCEO also formerly accepted complaints by referral from HUD as a participant in the Fair Housing Assistance Program. Note that the complaint data provided by the GCEO are from the entire state, and were not categorized according to whether they lay within the state’s entitlement jurisdictions.

Table V.15.B
Fair Housing Complaints Found With Cause by Issue
 Entitlement Areas of Georgia
 2004–2014 HUD Data

Issue	Total
Discrimination in term, conditions or privileges relating to rental	99
Failure to make reasonable accommodation	84
Discriminatory terms, conditions, privileges, or services and facilities	74
Discriminatory acts under Section 818 (coercion, etc.)	39
Discriminatory refusal to rent	31
Discriminatory advertising, statements and notices	31
Discriminatory financing (includes real estate transactions)	28
Otherwise deny or make housing available	27
Failure to permit reasonable modification	15
Other discriminatory acts	13
Discrimination in terms, conditions, privileges relating to sale	12
False denial or representation of availability - rental	8
Discrimination in the terms or conditions for making loans	8
Discriminatory refusal to negotiate for rental	7
Discriminatory refusal to rent and negotiate for rental	5
Discrimination in making of loans	5
Discrimination in services and facilities relating to rental	5
False denial or representation of availability - sale	3
Discrimination in the selling of residential real property	3
Discrimination in the appraising of residential real property	3
Non-compliance with design and construction requirements (handicap)	3
Discriminatory refusal to sell	2
Discriminatory refusal to sell and negotiate for sale	2
Steering	2
Using ordinances to discriminate in zoning and land use	2
Other non-compliance with design and construction requirements	2
Discriminatory refusal to negotiate for sale	1
Discriminatory advertisement - rental	1
False denial or representation of availability	1
Discrimination in services and facilities relating to sale	1
Redlining - mortgage	1
Use of discriminatory indicators	1
Failure to provide accessible and usable public and common user areas	1
Total Issues	520
Total Complaints	289

As shown in Table V.16 on the following page, the GCEO received 1,301 complaints from residents throughout the state from 2004 through 2014: more than half of these alleged racial discrimination against black residents. As had been the case with HUD complaints from the state’s non-entitlement areas, disability (specifically, physical disability) was the second most common complaint basis among complaints filed with the GCEO. The number of complaints received per year dropped considerably after 2010. Prior to that year, the GCEO had received 165 complaints per year on average; after that year, the yearly average was thirty-six.

Table V.16
Fair Housing Complaints by Basis

State of Georgia
2004–2014 GCEO Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	Total
Race – Black	63	52	79	86	122	99	101	26	7	8	4	647
Physical Disability	28	17	29	43	64	69	70	12	1	10	7	350
Familial Status	19	14	20	19	43	25	18	10	1	4	2	175
Sex – Female	11	10	26	19	43	25	18	9	3	6	2	172
National Origin	10	11	16	26	45	15	22	12	3	4	1	165
Mental Disability	6	4	8	12	16	3	3	8	2	5	2	69
Race – Hispanic	2	10	9	16	4			12	3	3	1	60
Mental and Physical disability	5	1	5	10	19	3	1	12		1		57
Color		3	2	6	22	5	8	6	1			53
Race – White	5	1	6	10	3	3	3	7	2			40
Retaliation	1	2	2		5			1	4	4	2	21
Sexual Harassment (Female)	1		1	1	2	1	4	3		2	1	16
Religion			1	1	3		1	5				11
Race - Asian			1	3	3			2				9
Race _ Ethically Mixed Couple	1		2		1	2		2				9
Sexual Harassment(Male)						1	2	1		1		5
Race – American Indian			1					2				3
Sex – Male	7	3										
Total Basis	159	128	211	261	409	264	269	130	27	48	22	1,928
Total Complaints	118	97	151	171	258	178	185	82	14	33	14	1,301

The most common discriminatory practices cited in complaints filed with the GCEO on Equal Opportunity were similar to those cited in the HUD complaints discussed above. As shown in Table V.17 below, these complaints included the following (number of complaints in parentheses):

- Discriminatory terms, conditions, privileges, or services and facilities (488 complaints);
- Discrimination in terms, conditions, or privileges relating to rental (245 complaints);
- Failure to make reasonable accommodation (211 complaints); and
- Discriminatory acts under Section 818 (199 complaints).

Discriminatory refusal to rent was also a relatively common accusation, as was discriminatory financing: these issues figured in 190 and 128 complaints, respectively.

Table V.17
Fair Housing Complaints by Issue

State of Georgia
2004–2014 GCEO Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	Total
Discriminatory terms, conditions, privileges, or services and facilities	17	28	26	54	89	119	129	16	3	4	3	488
Discrimination in terms, conditions or privileges relating to rental	33	32	40	34	61	4	4	13	7	12	5	245
Failure to make reasonable accommodation	19	3	17	27	39	32	42	17	4	8	3	211
Discriminatory acts under section 818 (coercion, etc.)	3	3	21	39	78	16	16	12	3	5	3	199
Discriminatory refusal to rent	7	9	27	29	29	30	35	15	3	5	1	190
Discriminatory financing (includes real estate transactions.)	20	8	8	15	15	15	28	18		1		128
Discriminatory advertising, statements, and notices.	5	12	13	7	8	11	23	14	4	3	1	101
All other	41	28	76	51	78	39	39	0	0	0	0	352
Total Issues	145	123	228	256	397	266	316	105	24	38	16	1,914
Total Complaints	118	97	151	171	258	178	185	82	14	33	14	1,301

SAVANNAH-CHATHAM FAIR HOUSING COUNCIL COMPLAINTS

The Savannah-Chatham Fair Housing Council (SCFHC) accepts complaints from residents of Savannah and Chatham County, and investigates those complaints. As shown in Table V.18 below, an overwhelming majority of complaints filed with the non-profit organization cited perceived discrimination on the basis of race: fifteen out of the eighteen total complaints the organization received in the last four years. Two complaints cited sex as the discriminatory basis, and the same number alleged discrimination on the basis of familial status or gender. Discrimination based on religion figured in one complaint.

Table V.18
Fair Housing Complaints by Basis
 Savannah-Chatham County
 Savannah-Chatham County Fair Housing Council, Inc.

Basis	2010	2011	2012	2013	2014	Total
Race	2	1		11	1	15
Sex	1	1		.	.	2
Familial Status	.	1		.	1	2
Gender	1	1		.	.	2
Religion	.	.		.	1	1
Total Basis	4	4	0	11	3	22
Total Complaints	3	2	0	11	2	18

The discriminatory issues cited in complaints filed with the Savannah-Chatham Fair Housing Council are summarized in Table V.19 below. As shown, a majority of complaints cited discriminatory acts prohibited by Section 804 of the Fair Housing Act, which pertains to discrimination in the sale or rental of housing generally. Some of the specific allegations cited included “different terms & conditions” and “otherwise make unavailable”, each of which were cited in six complaints, intimidation, which was cited in four complaints, and discriminatory advertising, cited in three complaints.

Table V.19
Fair Housing Complaints by Issue
 Savannah-Chatham County
 Savannah-Chatham County Fair Housing Council, Inc.

Issue	2010	2011	2012	2013	2014	Total
Section 804	.	.		10	.	10
Different Terms & Conditions	3	2		1	.	6
Otherwise Make Unavailable	3	2		1	.	6
Intimidation	2	2		.	.	4
Discriminatory Advertising	1	.		.	2	3
Refusal to Rent/Sell or Negotiate	.	.		.	2	2
Refusal to Rent	1	.		.	.	1
Harassment	.	.		1	.	1
Total Issues	10	6	0	13	4	33
Total Complaints	3	2	0	11	2	18

A majority of the complaints filed with the SCFHC were ultimately withdrawn, as shown in Table V.20 on the following page. Two ended with an administrative closure, and the same number were closed after an investigation determined that there was no probable cause to conclude that discrimination had occurred or was about to occur. Only one complaint was successfully conciliated.

Table V.20
Fair Housing Complaints by Closure

Savannah-Chatham County
Savannah-Chatham County Fair Housing Council, Inc.

Closure	2010	2011	2012	2013	2014	Total
Complaint Withdrawn	0	0		10	0	10
Pending/Still Open	0	0		1	2	3
Administrative Closure	0	2		0	0	2
No Probable Cause	2	0		0	0	2
Conciliated	1	0		0	0	1
Total Closure	3	2	0	11	2	18

The results of eleven fair housing cases that were litigated from 2003 through 2015 are included in Table V.21 below. The monetary damages awarded to plaintiffs in these cases totaled \$1,444,252, and at least 3,250 housing units were made available to prospective residents regardless of their protected class status through this litigation. Most of these cases; or eight out of the eleven total cases; concerned discrimination on the basis of disability.

Table V.21
Litigated Fair Housing Complaints

Savannah-Chatham County
Savannah-Chatham County Fair Housing Council, Inc.

Year	Transaction Type	Protected Class	Units Made Available	Plaintiff's Actual Recovery	Other Remedies Awarded
2003	Rental	Disability	.	\$10,000	Modifications
2004	Rental	Disability	100	\$68,948	Modifications
2004	Rental	Familial Status	.	\$7,500	Policy Changes
2004	Sales, Condominium (Design & Construction)	Disability	32	\$49,566	Modifications
2007	Rental Mobile Home Park	Race, Color, Sex/Gender	89	\$680,000	Advertising Management Change, Training
2006	Sales, Condominium (Design & Construction)	Disability	TBD	\$437,875	Modifications, Settlement Fund
2007	Sales, Condominium (Design & Construction)	Disability	TBD		Modifications, Settlement Fund
2009	Sales, Condominium (Design & Construction)	Disability	4	\$10,800	Modifications
2010	Rental (Mobile Home on Separate Lot)	Race, Color	27	\$162,500	Management Change, Affirmative Marketing, Training
2010	Rental Apartments (Design & Construction)	Disability	>3000	\$17,063	Modifications
2015	Rental (Mobile Home on Separate Lot)	Disability	.	Pending/Open	.

FAIR HOUSING SURVEY – PRIVATE SECTOR RESULTS

Additional evaluation of fair housing within the State of Georgia was conducted via an online survey of stakeholders that began in April 2015. The purpose of the survey 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 below, and additional survey results are discussed in **Sections VI** and **VII**.

The 2015 State of Georgia Fair Housing Survey was completed by 739 persons in the state 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, or when multiple narrative responses indicated similar issues, findings suggested likely impediments to fair housing choice.

Numerical tallies of results and summaries of some comment-driven questions 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 State of Georgia’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.22 on the following page. Note that where percentages are given in the following narrative, those figures were based on respondents who actually answered the question under discussion; missing responses were accordingly omitted from percentage calculations.

Barriers to fair housing choice or questionable practices in the private housing sector were most salient in the rental housing market, where 97 respondents, or around 19 percent, stated that they were aware of such barriers or practices. Those who cited specific practices or issues in the rental housing market focused on a lack of affordable housing, failure to accommodate residents with disabilities, and racial discrimination. Around one respondent in seven was to be aware of questionable practices or barriers to fair housing choice in housing construction and accessible design and the home lending industries: in specifying the practices or barriers they had in mind, many respondents cited failure to include accessible design features in new construction and differential treatment in the lending market based on race and gender. Around one respondent in nine was aware of questionable practices in the real estate industry, highlighting a lack of affordable housing and perceived “steering” on the part of real estate agencies. Fewer than ten percent of respondents were aware of any questionable practices or barriers to fair housing choice in the remaining private sector areas.

Table V.22
Barriers to Fair Housing in the Private Sector
 State of Georgia
 2015 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?	97	264	148	230	739
The real estate industry?	54	246	206	233	739
The mortgage and home lending industry?	69	227	211	232	739
The housing construction or accessible housing design fields?	68	245	191	235	739
The home insurance industry?	34	223	247	235	739
The home appraisal industry?	38	212	253	236	739
Any other housing services?	33	226	241	239	739

Considered as a whole, commentary submitted with the private sector portion of the fair housing survey included some themes that were common across respondents and different areas of the private housing sector. Examples of recurring concerns included:

- Discrimination based on disability or failure to make reasonable accommodation;
- Discrimination based on race in the rental and lending markets;
- Issues relating to a lack of affordable housing and NIMBYism; and
- Lack of fair housing education.

SUMMARY

Analysis of factors in the private sector that may impact fair housing choice includes a review of patterns in home and small business lending, fair housing complaints filed with the Department of Housing and Urban Development and the Georgia Commission on Equal Opportunity, and a variety of practices in the private housing market.

Banks and other lending institutions in the state handled over 7.4 million small business loans and loan applications in the state from 2004 through 2013. Nearly half of these loans came from the state’s non-entitlement areas, and 38 percent of those loans were intended to finance the purchase of a home. Most of those home purchase loans; more than 87 percent; were for homes in which the loan applicant intended to live.

Nearly one fifth of these owner-occupied home purchase loans were denied in entitlement and non-entitlement areas alike from 2004 through 2013, though the yearly denial rate in the state’s non-entitlement areas has grown steadily and consistently since 2004, when 17.2 percent of loan applications in those areas were denied. Denial rates were markedly higher for female than for male applicants, particularly in the state’s non-entitlement areas. Black applicants were also more likely to be denied a loan than white applicants, and unlike discrepant denial rates for male and female applicants, the disparity in denial rates between white and black applicants was more pronounced in the state’s entitlement areas than in its non-entitlement areas. Nevertheless, at 29.8 percent the denial rate for black applicants in the state’s non-entitlement areas was close to twice the denial rate for white applicants. Hispanic applicants were also more likely to be turned down than non-Hispanic applicants, though the disparity was less: between three and four percentage points.

Geographic trends in denial rates for black and Hispanic residents tended to mirror denial rates for the population overall, in that denial rates were higher in rural Census tracts and lower in Census tracts surrounding the state's major cities and entitlement areas.

Credit history was by far the most prevalent reason for loan denials in the state's non-entitlement areas, followed by debt-to-income ratio. Unfavorable debt-to-income ratios were cited in a similar percentage of denied applications in the state's entitlement areas; however, credit history was not as prevalent a factor in loan denials in the state's entitlement areas. Not surprisingly, denial rates tended to fall as the income of the applicant increased, particularly in lower income brackets. However, increases in income had a relatively modest effect on denial rates in income brackets above \$30,000, especially in the state's entitlement areas. In spite of the effect of rising incomes on denial rates, discrepancies in denial rates between white and black loan applicants remained even when income was taken into consideration. For example, the denial rate for black, non-entitlement loan applicants earning \$60,000 to \$75,000 per year was, at 23.2 percent, nearly twice the denial rate for white applicants in the same income range over the ten-year period.

Many of those who were able to secure a home purchase loan were issued loans with relatively high annual percentage rates, or HALs. These high-cost loans were especially common in 2005 and 2006, though they have recently accounted for fewer than five percent of home purchase loans issued in the state's non-entitlement areas. Like home loan denials, HALs accounted for relatively large percentages of home purchase loans in Census tracts in the south of the state. Also in keeping with trends in home loan denials was the higher incidence of HALs among black and Hispanic borrowers, as compared to white and non-Hispanic borrowers, respectively.

Small business lending in the state tended to be directed toward more populous areas in and around entitlement jurisdictions and major transportation corridors. All told, less than ten percent of small business loans went to low- or moderate-income Census tracts, with the majority going to middle-income Census tracts.

Residents of the state's non-entitlement areas filed some 535 fair housing complaints with HUD between 2004 and 2014. More than half of these alleged discrimination on the basis of race, followed by the roughly 37.4 percent of complaints that cited discrimination on the basis of disability. Complainants most commonly accused housing providers of discrimination in terms, conditions, privileges, or services and facilities; discrimination in terms, conditions, or privileges relating to rental; failure to make reasonable accommodation; and coercion intended to prevent complainants from taking advantage of their fair housing rights. More than half of the complaints filed with HUD were determined to have no cause, meaning that the investigation did not produce sufficient evidence to conclude that discrimination had likely occurred. Among complaints that were resolved or found to have cause, race remained the most common discriminatory basis, followed by disability. The discriminatory issues cited in resolved complaints were also generally the same as those cited in complaints overall.

Though the foregoing narrative relates primarily to complaints from the state's non-entitlement areas, similar trends and patterns were observed in complaints filed with HUD by residents of the state's entitlement areas. Complaints filed with the Georgia Commission on Equal

Opportunity by state residents reflected many of the same issues and trends that were observed in HUD complaint data.

Finally, the Savannah-Chatham Fair Housing Council received 18 fair housing complaints from 2010 through 2014. An overwhelming majority of these cited racial discrimination. The non-profit organization also participated in the litigation of eleven fair housing complaints from 2003 through 2015, most of which alleged discrimination on the basis of disability. As a result of this litigation, plaintiffs recovered approximately \$1.4 million total, and over 3,200 units were made available to prospective residents irrespective of their protected class status.

A total of 739 stakeholders and citizens responded to the 2015 Fair Housing Survey. The most salient fair housing issues and challenges in the private sector among those respondents included perceived discrimination in the rental housing market. Those who provided additional commentary specifying the type of discrimination they saw most frequently cited a lack of affordable housing, failure to make reasonable accommodations to residents with disabilities, and racial discrimination. Awareness of questionable practices or barriers to fair housing choice was also relatively common in questions pertaining to housing construction, accessible design, and the home lending industry.

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, though investigation of a number of housing factors within the public sector, including health and safety codes, construction standards, zoning and land use policies, tax policies, development standards, the placement of public and publicly assisted housing, and 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.

ASSISTED HOUSING UNITS

Public or assisted housing, including low-income housing developments, housing voucher programs, and supportive housing, exist to provide subsidized housing that is suitable for persons with special needs or families of low- to moderate-income levels and to promote access to jobs, transportation, and related community resources.

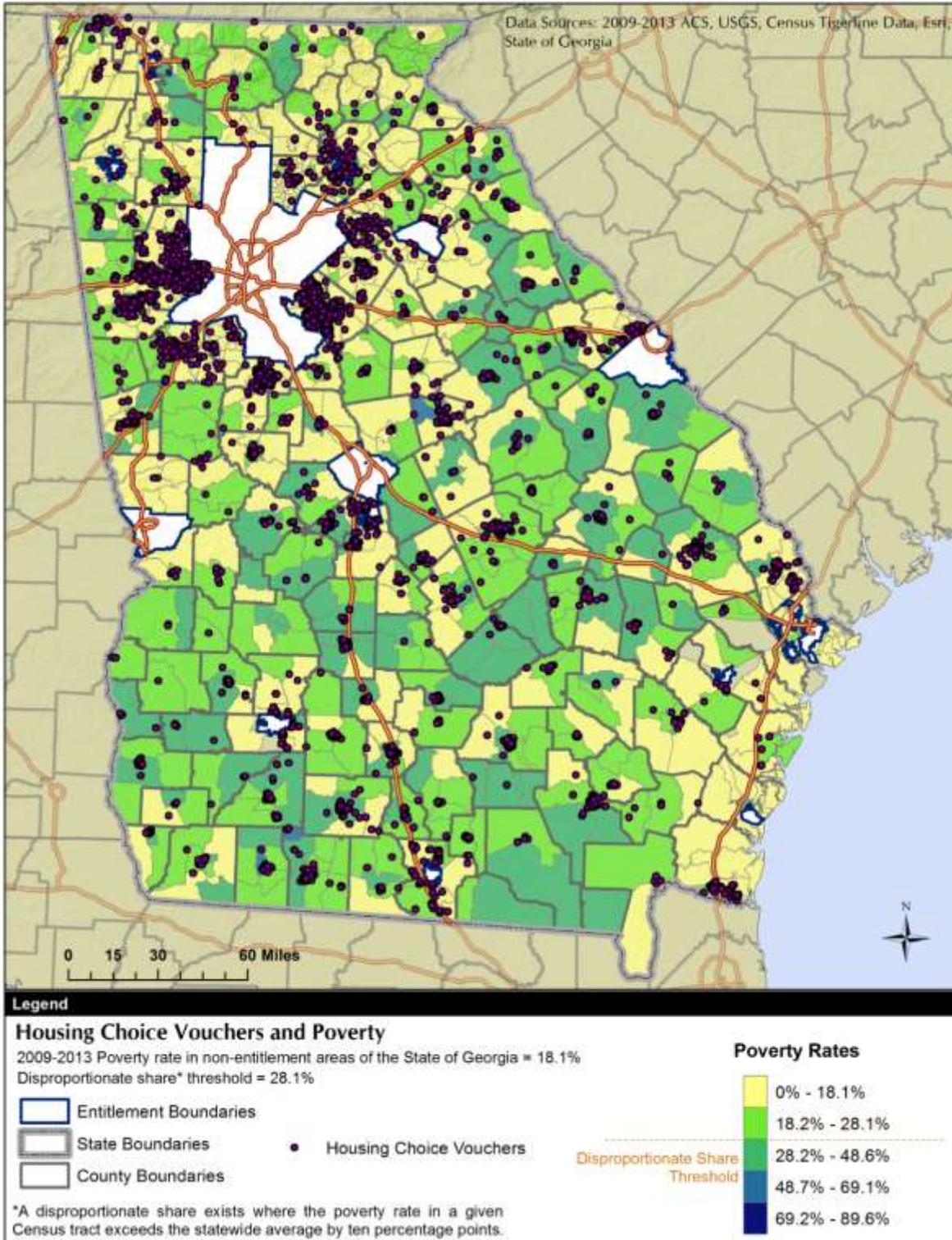
Housing Choice Vouchers

Housing Choice Vouchers are portable housing subsidies, meaning that 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. The program covers monthly rental costs minus the tenant's contribution, which is at most thirty percent of his or her monthly adjusted income or ten percent of monthly unadjusted gross income. The location of Housing Choice Vouchers throughout the state's non-entitlement areas is presented in Map VI.1 on the following page, as well as in Map VI.2 on page 117. As shown, these vouchers tended to be concentrated in and around the state's more populous entitlement jurisdictions and major transportation corridors. There was also a tendency for these units to be concentrated in areas with relatively high concentrations of poverty, as shown in Map VI.1, and racial minority residents, as shown in Map VI.2.

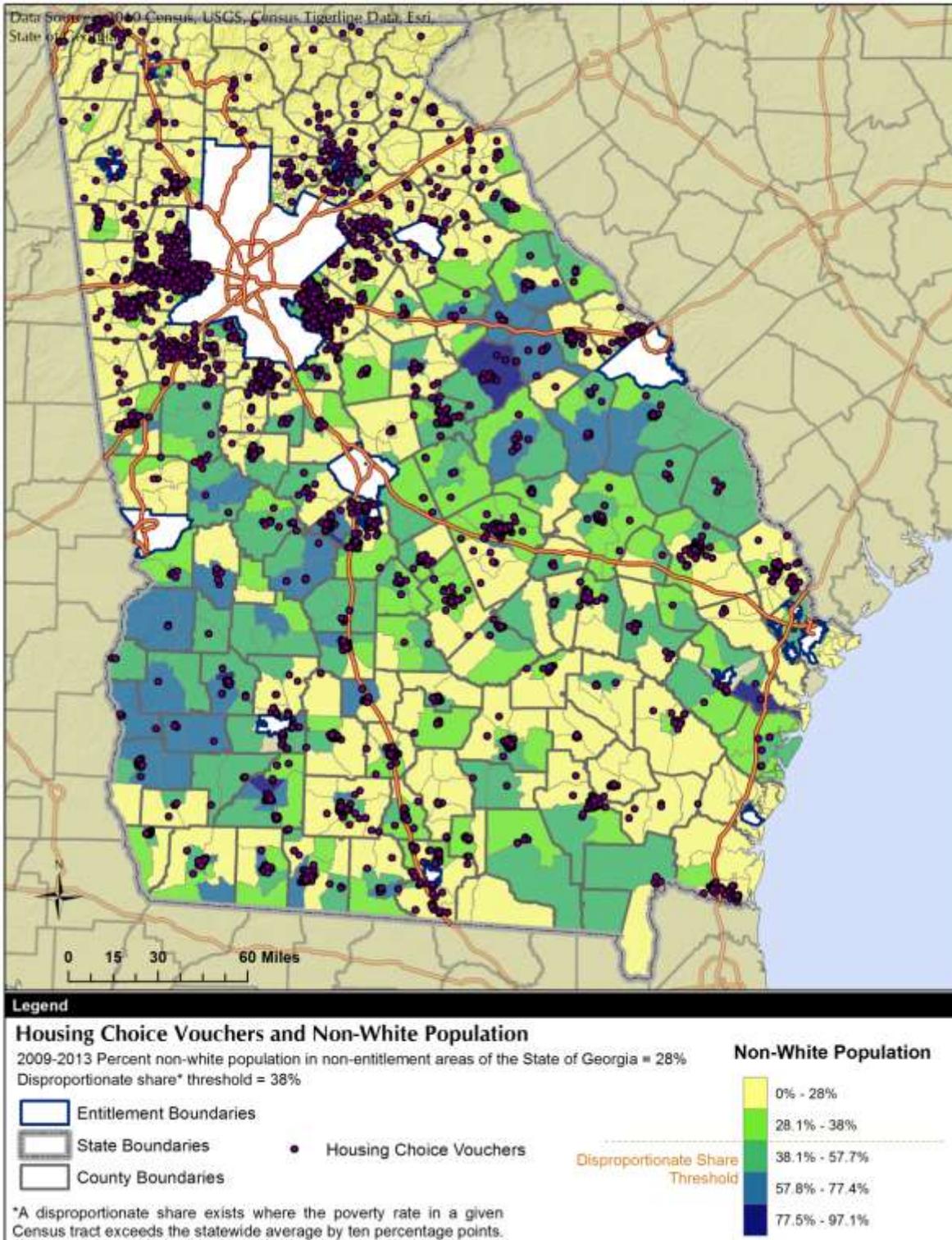
HUD-Assisted Multifamily Housing Developments

HUD maintains a database of housing developments that are funded through a variety of federal programs, including Housing Choice Vouchers and supportive housing for elderly residents and residents with disabilities. The locations of these developments throughout the state's non-entitlement areas are presented in Map VI.3 on page 118 and Map VI.4 on page 119. Like Housing Choice Vouchers, HUD-assisted multifamily units tended to be concentrated in and around urban areas of the state, and the number of multifamily housing units in a given Census tract tended to be higher in Census tracts with higher poverty rates, as shown in Map VI.3, and concentrations of minority residents, as shown in Map VI.4.

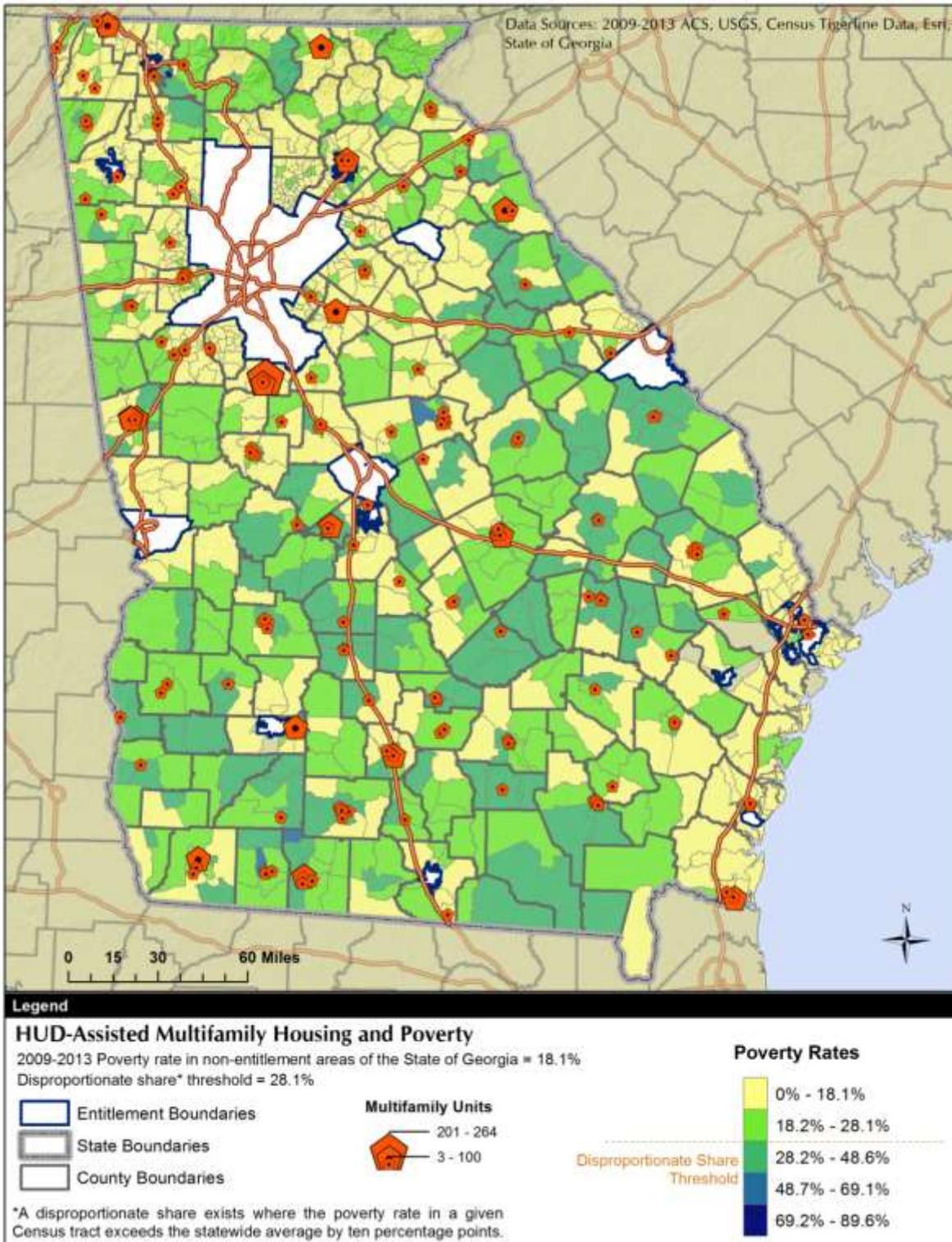
Map VI.1
Housing Choice Vouchers and Poverty
 Non-Entitlement Areas of Georgia
 2015 State of Georgia



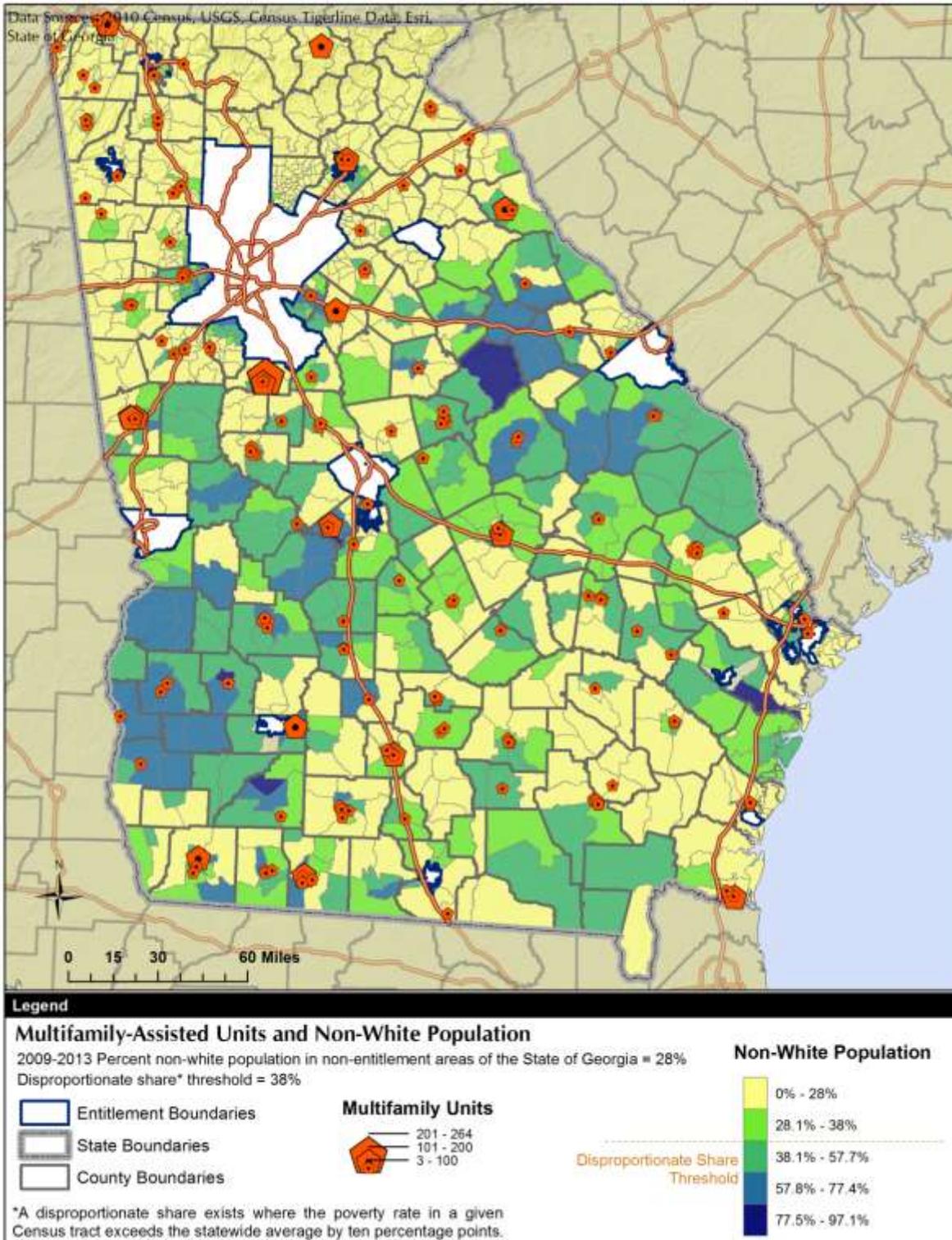
Map VI.2
Housing Choice Vouchers and the Non-White Population
 Non-Entitlement Areas of Georgia
 2015 State of Georgia



Map VI.3
Multifamily Housing and Poverty
 Non-Entitlement Areas of Georgia
 2015 Multi-family and Section 8 Housing Database



Map VI.4
Multifamily Housing and the Non-White Population
 Non-Entitlement Areas of Georgia
 2015 Multi-family and Section 8 Housing Database



POLICIES AND CODES

Information on municipal codes, ordinances, and other local policies were gathered through telephone interviews with officials from non-entitlement communities in the State of Georgia, as well as in review of local zoning codes and ordinances. Land-use and planning officials from a total of fifty non-entitlement communities were contacted during the course of the analysis of impediments, and of those who responded to requests for an interview, twenty-eight agreed to answer a series of question relating to housing development, special needs housing, and fair housing. A total of 45 land-use and planning officials completed the survey; the communities that those officials represented are listed in Table VI.1 below, at right.

The responses of these officials were supplemented in certain cases by a review of definitions included in local zoning codes. Note that where percentages or proportions are given in the following narrative, those figures exclude missing responses.

The purpose of the interviews was to evaluate the public sector environment for a variety of housing types, including affordable housing, mixed-use housing, senior housing, and group homes. The results of the survey of local land-use planning officials are tabulated in Table VI.2 on the following page.

Fair housing laws seek to protect classes of persons with certain attributes from discrimination, including individuals with disabilities, seniors, and families with children. In order to support these protected classes, it is helpful to have accurate definitions of these classes and to consider the potential effects of zoning and land use policies. Thirty-three of the jurisdictions surveyed included definitions for “dwelling units” or “residential units” in their local zoning codes, or approximately 94 percent. Thirty-two jurisdictions also included definitions for “family”. By contrast, only ten of twenty-six jurisdictions stated that their zoning codes included a definition for “disability”, or were observed to include such definitions in review of their zoning codes, or around thirty-eight percent.

Around 88 percent of jurisdictions included provisions in their zoning codes that allow or encourage the development of mixed-use housing; however, around 48 percent also included provisions that may serve to hinder the development of mixed-use housing, in the estimation of the planning officials surveyed. Three jurisdictions included guidelines that were designed to promote the development of affordable housing units, while eight officials considered their local zoning codes to include provisions that may hinder the development of affordable housing. Only one jurisdiction surveyed included residential occupancy standards or limits in its zoning code.

Apart from the applicable building codes, only five jurisdictions had adopted development standards designed to promote accessibility in housing, though sixteen did include a special process by which residents with disabilities could request reasonable accommodations or modifications to local land-use policies. Nine jurisdictions featured standards for the

Table VI.1
Participating Jurisdictions
The State of Georgia
2015 Land-Use Planner Survey

Americus	Metter
Ashburn	Milledgeville
Baxley	Monroe
Braselton	Moultrie
Byron	Newnan
Calhoun	Oakwood
Cartersville	Peachtree City
Chatsworth	Pelham
Conyers	Perry
Cornelia	Pooler
Cuthbert	Rockmart
Douglasville	Social Circle
Dublin	St. Marys
Euharlee	Statesboro
Fayetteville	Summerville
Griffin	Thomasville
Hartwell	Tifton
Hazlehurst	Vienna
Kingsland	Washington
LaGrange	Waycross
Lyons	Winder
Madison	Walthourville
Manchester	

development of senior housing in their zoning codes, and seven included guidelines that distinguish senior citizen housing from other (multi-family) residential uses. Finally, twelve jurisdictions had guidelines for developing housing for other special needs populations, including victims of domestic violence, those recovering from substance abuse, youth in crisis, and people living with HIV/AIDS, among others.

Table VI.2
Local Land-Use and Zoning Ordinances
The State of Georgia
2015 Land-Use Planner Survey Data

In your local zoning codes, are there:	Yes	No	Don't Know	Missing	Total
Definitions for the terms "dwelling unit" or "residential unit"?	33	1	1	10	45
Guidelines that allow or encourage the development of mixed use housing?	22	3	0	20	45
Any complications that may hinder the development of mixed use housing?	12	13	0	20	45
Guidelines that encourage the development of affordable housing units?	3	20	1	21	45
Any complications that may hinder developing low- to moderate-income housing?	8	16	0	21	45
A definition for the term "family"?	32	2	0	11	45
Residential occupancy standards or limits?	1	23	0	21	45
A definition for the term "disability"?	10	16	0	19	45
Development standards for making housing accessible to persons with disabilities, outside building codes?	5	18	1	21	45
Any special processes by which persons with disabilities can request reasonable accommodations or modifications to the jurisdiction's policies?	16	8	0	21	45
Standards for the development of senior housing?	9	15	0	21	45
Guidelines that distinguish senior citizen housing from other (multi-family) residential uses?	7	17	0	21	45
Guidelines for developing housing for any other special needs populations?	12	12	0	21	45

FAIR HOUSING SURVEY – PUBLIC SECTOR RESULTS

As mentioned previously, further evaluation of the status of fair housing within State of Georgia was conducted via an online 2015 Fair Housing Survey, which was completed by 739 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.3 below. As was the case with the private sector portion of the survey, those who were aware of barriers to fair housing choice in the state's public housing sector, or in public sector services of policies that affect the housing market, generally accounted for fewer than 20 percent of respondents.⁶⁴ A notable exception was "limited access to government services, such as transportation or employment services": over thirty percent of respondents maintained that they were aware of questionable practices or barriers to fair housing choice in this area, with many respondents citing a lack of access to public transportation or limited transit networks.

Apart from questionable practices or barriers in the provision of government services, the most salient issues relating to fair housing were to be found in land-use policies and zoning laws. Around one respondent in six maintained that they were aware of barriers to fair housing choice in these areas: A common perception among those respondents was of the use of restrictive land-use or zoning policies to block or limit the placement of affordable housing units.

Table VI.3
Barriers to Fair Housing in the Public Sector
State of Georgia
2015 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?	74	213	192	260	739
Zoning laws?	83	202	193	261	739
Occupancy standards or health and safety codes?	53	219	210	257	739
Property tax policies?	41	203	230	265	739
Permitting process?	36	215	227	261	739
Housing construction standards?	29	227	218	265	739
Neighborhood or community development policies?	49	210	209	271	739
Limited access to government services, such as transportation or employment services?	147	194	134	264	739
Public administrative actions or regulations?	34	202	239	264	739

Several themes emerge from consideration of commentary submitted with this portion of the survey. Such themes include the following:

- Issues relating to zoning, and to land-use policies that limit the placement of affordable housing;
- Inadequate enforcement of health and safety codes;
- The presence of a confusing array of accessibility standards at the federal, state, and local level;
- The perception that community development policies fail to promote the development of affordable housing, and may be used to block such development; and

⁶⁴ As before, percentage figures cited in this section do not include missing responses.

- Concern that rural and non-entitlement areas of the state tend to be bypassed by state and federal community development funds, which are perceived to be targeted toward the Atlanta metropolitan area, along with white, affluent areas more generally.

SUMMARY

Assessment of potential barriers to fair housing choice in the public sector involved an analysis of the placement of affordable housing units throughout the state, interviews with local land-use planning officials in select municipalities throughout the state, and the experience of stakeholders in a variety of industries and public policy arenas.

The data indicated that Housing Choice Voucher recipients tended to be more highly concentrated in and around the state's urban areas, especially around the Atlanta metropolitan area. Units that were subsidized through housing choice vouchers were also observed to be concentrated along the state's major transportation corridors, and tended to be more concentrated in areas with relatively high concentrations of racial and ethnic minorities and households living in poverty.

Relatively few of the non-entitlement jurisdictions surveyed included definitions of "disability" in their local zoning codes, and fewer of those zoning codes include development standards for making housing accessible to persons with disabilities. In addition, while 88 percent of jurisdictions surveyed included provisions in their zoning code to encourage the development of mixed-use housing, and about half of jurisdictions surveyed also considered their zoning codes to contain provisions that may serve to limit the development of mixed-use housing. Few jurisdictions had provisions to encourage the development of affordable housing, and eight of the jurisdictions surveyed considered their zoning codes to contain provisions that could limit the development of affordable housing.

The most salient fair housing challenges in the public sector among respondents to the 2015 State of Georgia Fair Housing Survey included limited access to government services and questionable practices in land-use and zoning laws. Those who submitted additional commentary to specify the types of challenges of which they were aware cited limitations in access to and availability of public transportation options, along with land-use and zoning policies that potentially serve to block or restrict the placement of affordable housing units.

SECTION VII. PUBLIC INVOLVEMENT

This section discusses analysis of fair housing in the State of Georgia 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 statewide 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 2015 Fair Housing Survey comprised a large portion of the public involvement efforts associated with the development of the 2016 AI. While data from the survey regarding policies and practices within the private and public sectors have already been discussed, questions included to gauge and characterize public participation in the survey are discussed below.

The purpose of the 2015 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 State were solicited to participate.

A total of 739 persons in the State of Georgia completed the survey, which was conducted entirely online. A complete list of responses is included in Appendix B. Additional survey results, relating to barriers to fair housing choice in the private and public sectors, are discussed in **Sections V and VI**, respectively. Respondents were asked to identify their primary role within the housing industry. As shown in Table VII.1 at right, the largest group of respondents consisted of the 197 who were local government officials and employees, followed by the 129 who considered themselves service providers, the 106 who considered themselves advocates or service providers, and the 79 who were property managers.

Table VII.1
Role of Respondent
State of Georgia
2015 Fair Housing Survey Data

Primary Role	Total
Local Government	197
Service Provider	129
Advocate/Service Provider	106
Property Management	79
Construction/Development	43
Law/Legal Services	27
Banking/Finance	23
Real Estate	21
Insurance	1
Other Role	101
Missing	12
Total	739

Table VII.2
What is your housing situation?

State of Georgia
2015 Fair Housing Survey Data

Tenure	Total
Homeowner	410
Renter	100
Other	215
Missing	14
Total	739

Survey respondents were also asked to identify their own housing status. As shown in Table VII.2 at left, a majority, or 410 respondents, consisted of homeowners. Some 100 respondents were renters, or 13.8 percent. A large minority of respondents, or around 30 percent, identified their housing situation as “other”.

The next question asked respondents about their familiarity with fair housing laws. Results of this question are presented on the following page in Table VII.3. As shown, a majority of respondents considered themselves to

be “somewhat” or “very” familiar with fair housing laws: more than 84 percent. Only around 16 percent felt that they were not familiar with fair housing laws.

Respondents were also asked a series of questions designed to gauge their perceptions concerning federal, state, and local fair housing laws. Responses to these questions are summarized in Table VII.4 below. An overwhelming majority of respondents, or around 88 percent, agreed that fair housing laws serve a useful purpose, though respondents were more divided on the question of whether or not such laws are difficult to understand or follow: around 35 percent felt that such laws were difficult to understand or follow. When asked whether they would like to see any additional groups protected by fair housing laws, more than a fifth stated that they would, citing a need for additional protections based on age, sexual orientation, criminal status, income, and LGBT⁶⁵ status. A majority of respondents felt that fair housing laws are adequately enforced, though around 36 percent felt that current laws are not well-enforced.

Table VII.3
How Familiar are you with Fair Housing Laws?

State of Georgia
2015 Fair Housing Survey Data

Familiarity	Total
Not Familiar	91
Somewhat Familiar	267
Very Familiar	210
Missing	171
Total	739

Table VII.4
Federal, State, and Local Fair Housing Laws

State of Georgia
2015 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total
Do you think fair housing laws are useful?	497	19	47	176	739
Are fair housing laws difficult to understand or follow?	199	266	100	174	739
Do you think additional groups should be protected under the State fair housing law?	125	191	243	180	739
Do you think fair housing laws are adequately enforced?	293	196	61	189	739

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 at the federal, state, and local level. 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. Results of this question are presented at right in Table VII.5. A total of 398 respondents attempted to identify groups protected under applicable fair housing laws, and more than half of those who answered were able to correctly identify religion, gender, and family status as protected classes. Fewer correctly identified national origin, and a considerable number of applicants incorrectly included groups that are not protected by fair housing laws at the federal or state level, .e.g., age and sexual orientation.

Table VII.5
Protected Classes

State of Georgia
2015 Fair Housing Survey Data

Protected Class	Total
Religion	256
Gender	247
Family Status	208
National Origin	189
Age	146
Color	109
Sexual Orientation	103
Disability	45
Marital Status	42
Income	38
Ethnicity	32
Race	18
Military	13
Victims of Domestic Violence	7
Criminal History	6
Persons with AIDS/HIV	4
Ancestry	1
Other	118
Total	1,543

Table VII.6 on the following page presents tallied responses to survey questions relating to a variety of fair housing activities in the State of Georgia. Some 293 respondents were aware of a

⁶⁵ LGBT stands for lesbian-gay-bisexual-transgender.

training process that was available to learn about fair housing, and 246 noted that they had participated in such training. However, 231 of respondents shared the impression that current levels of outreach and education are insufficient, while only twelve thought that current levels of outreach and education were excessive. Only around one fifth of respondents were aware of fair housing testing, and of those who weighed in on current levels of testing around 18 percent felt that current levels were insufficient.

Table VII.6
Fair Housing Activities
State of Georgia
2015 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total	
Is there a training process available to learn about fair housing laws?	293	196	61	189	739	
Have you participated in fair housing training?	246	104	16	373	739	
Are you aware of any fair housing testing?	124	297	125	193	739	
Testing and education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity?	231	115	12	191	190	739
Is there sufficient testing?	110	56	10	372	191	739

Respondents were also asked a couple of questions relating to fair housing at the local level. As shown in Table VII.7 below, 84 respondents were aware of a city or county fair housing ordinance, regulation, or plan. Eighty-three respondents were aware of specific areas with fair housing challenges. Those who provided additional commentary on this question listed a wide range of areas, but rural areas were commonly cited, as were counties in the north of the state.

Table VII.7
Local Fair Housing
State of Georgia
2015 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?	84	193	177	285	739
Are there any specific geographic areas that have fair housing problems?	83	91	281	284	739

Finally, respondents were asked to share any additional comments or concerns that they might have relating to fair housing in the state. Responses to those comments were predictably wide-ranging, though many respondents cited a need for increased fair housing education and additional resources dedicated to fair housing.

FAIR HOUSING CITIZENS SURVEY

In addition to the 2015 Fair Housing Survey, which primarily targeted stakeholders in the housing market, the State also conducted a survey targeting interested citizens in order to assess their experience in the housing market. A total of 247 citizens participated in the survey. The following narrative offers a summary of the responses to that survey. Note that where percentage figures are referenced in the survey, these figures are based on those who responded to each question. The total number who responded to each question are presented at the bottom of each table.

RESPONDENT PROFILE

Of the 247 who took the survey, 234 identified their role in the housing market, with 46.6 percent identifying themselves as citizens, 21.4 percent as local government staff, and 7.7 percent as local elected officials. These results are presented in Table VII.8 below.

Table VII.8
For statistical purposes, check which
one most applies to you

State of Georgia
 Impediments to Fair Housing: A Neighborhood Survey

Role	Responses	% of Total
Citizen	109	46.6%
Local Government Staff	50	21.4%
Local Elected Official	18	7.7%
Social Service Provider	10	4.3%
Fair Housing Advocate	10	4.3%
Grant Administrator	9	3.8%
Builder/Developer	7	3.0%
Other(Please Specify)	21	9.0%
Total	234	100.0%

Those who worked for state or local governments accounted for the largest percentage of survey respondents at 33.5 percent, as shown in Table VII.9 below. In addition, 17.6 percent of respondents worked in housing services, and 7.7 percent were part of faith-based organizations.

Table VII.9
Do you consider yourself or your organization
to be:

State of Georgia
 Impediments to Fair Housing: A Neighborhood Survey

Role	Responses	% of Total
Government	74	33.5%
Housing Services	39	17.6%
Faith Based	17	7.7%
Social Services	12	5.4%
Community Action Agency	12	5.4%
Advocacy Group	8	3.6%
Trade or Professional Organization	7	3.2%
Support Service Provider	7	3.2%
Health Service	3	1.4%
Other(Please specify)	42	19.0%
Total	221	100.0%

Around 60 percent of survey respondents were homeowners, and an additional 29.3 percent identified themselves as renters and 3.5 percent as residing in a rental house. As shown in Table VII.10 on the following page, an additional 3.5 percent lived with friends or family.

Table VII.10
Which type of housing applies to you?

State of Georgia
 Impediments to Fair Housing: A Neighborhood Survey

Housing	Responses	% of Total
Own	139	60.7%
Rent	67	29.3%
Emergency Shelter	1	0.4%
With Friends/Family	8	3.5%
Rental House	8	3.5%
Transitional Housing	2	0.9%
Other (please specify)	4	1.7%
Total	229	100.0%

A majority of respondents were married, as shown in Table VII.11 below. Around 37 percent of respondents were married with children, while 17.5 percent were married without children. Single female householders with children also accounted for 17.5 percent of survey respondents.

Table VII.11
Which type best describes your household?

State of Georgia
 Impediments to Fair Housing: A Neighborhood Survey

Housing	Responses	% of Total
Married couple with children	85	37.1%
Married couple without children	40	17.5%
Female householder with children	40	17.5%
Female householder without children	36	15.7%
Male householder without children	9	3.9%
Male householder with children	0	0.0%
Other	19	8.3%
Total	229	100.0%

A majority of respondents lived in small, two- or three-person households, while nearly a quarter lived in four- to five-person households, as shown in Table VII.12 below. Those who lived in single-person households comprised 17.5 percent of survey respondents.

Table VII.12
Counting yourself, how many people live in your household?

State of Georgia
 Impediments to Fair Housing: A Neighborhood Survey

Persons	Responses	% of Total
One	40	17.5%
Two to Three	129	56.3%
Four to Five	55	24.0%
Six or More	5	2.2%
Total	229	100.0%

Survey respondents were also asked to identify which age range they fell into: as shown in Table VII.13 on the following page, 37.1 percent of respondents were aged 46 to 60 years. These respondents, together with those aged 36 to 45, who accounted for around a fifth of survey respondents, represented a majority of those who took the survey and responded to this question.

Table VII.13
How old are you?

State of Georgia
Impediments to Fair Housing: A Neighborhood Survey

Age	Responses	% of Total
18-25	10	4.4%
26-35	40	17.5%
36-45	47	20.5%
46-60	85	37.1%
61-65	28	12.2%
66 and over	19	8.3%
Total	229	100.0%

Over 70 percent of respondents were employed full time, as shown in Table VII.14 below. An additional 10.9 percent of respondents worked part-time, and 4.1 percent were employed in more than one job. However, nearly twelve percent were unemployed.

Table VII.14
Employment Status?

State of Georgia
Impediments to Fair Housing: A Neighborhood Survey

Status	Responses	% of Total
Unemployed	26	11.8%
Part-time	24	10.9%
Full-time	158	71.8%
Seasonal/temporary	3	1.4%
More than 1 job	9	4.1%
Total	220	100.0%

Few who took the survey considered themselves to be totally uninformed about housing discrimination. As shown in Table VII.15 below, 30 percent of respondents considered themselves to be very informed, 40 percent were somewhat informed, and 22.4 percent were a little informed.

Table VII.15
How well informed would you say you are about housing discrimination?

State of Georgia
Impediments to Fair Housing: A Neighborhood Survey

Answers	Responses	% of Total
Very informed	63	30.0%
Somewhat informed	84	40.0%
A little informed	47	22.4%
Not informed at all	16	7.6%
Total	210	100.0%

More than ninety percent of survey respondents considered themselves to be aware of the basic requirements of fair housing law, as shown in Table VII.16 on the following page. Less than ten percent considered themselves to lack a basic awareness of fair housing requirements.

Table VII.16
Are you aware of the "basic" fair housing requirements?

State of Georgia
 Impediments to Fair Housing: A Neighborhood Survey

Answer	Responses	% of Total
Yes	192	90.6%
No	20	9.4%
Total	212	100.0%

FAIR HOUSING ISSUES

A considerable majority of respondents; more than two-thirds, did not believe that housing discrimination was an issue in their community. As shown in Table VII.17 below, 31.7 percent of respondents did consider housing discrimination to be an issue in their communities.

Table VII.17
Do you believe housing discrimination is an issue within your community?

State of Georgia
 Impediments to Fair Housing: A Neighborhood Survey

Answer	Responses	% of Total
Yes	63	31.7%
No	136	68.3%
Total	199	100.0%

Respondents were also asked to state whether a number of issues were present in their neighborhoods or communities. As shown in Table VII.18 below, 95 respondents noted that there were minorities living in segregated neighborhoods in their communities, or around 43 percent. A similar percentage, or 42 percent, stated that there was no housing for the elderly in their community, and around 44 percent noted that there was not sufficient housing for persons with disabilities in their community.

Table VII.18
Please indicate if the following issues are present in your community:

State of Georgia
 Impediments to Fair Housing: A Neighborhood Survey

Issues	Yes	No	Don't Know	Total
Minorities living in segregated neighborhoods	95	89	37	221
Housing for the elderly	62	93	66	221
Sufficient housing for persons with disabilities	40	97	85	222

When asked a series of questions designed to gauge respondents' experience with public transportation, those respondents most commonly reported that public transportation is not available in their immediate area. As shown in Table VII.19 on the following page, 51 respondents reported that public transportation did not lead to major employers, while 45 respondents stated that public transportation did provide access to major employers. In addition, 47 respondents maintained that public transportation was not available when they need to get to work, though 40 found that public transportation did operate at times that would allow them to get to work.

Table VII.19
Please indicate if the following transportation issues are present in you

State of Georgia
 Impediments to Fair Housing: A Neighborhood Survey

Issues	Yes	No	I do not take public transportation	Public transportation is not available in my immediate area	I don't know	Total
Does public transportation lead to major employers?	45	51	37	72	13	218
Does public transportation service run at times that you need to get to work?	40	47	43	72	15	217

Respondents generally considered affordable housing options in their communities to be insufficient. As shown in Table VII.20 below, over 70 percent of respondents maintained that there is not enough affordable housing in the community in which they reside. Only around 29 percent considered the current stock of affordable housing in their communities to be sufficient.

Table VII.20
Do you think there is enough affordable housing in the community in which you reside?

State of Georgia
 Impediments to Fair Housing: A Neighborhood Survey

Answer	Responses	% of Total
Yes	62	29.1%
No	151	70.9%
Total	213	100.0%

Respondents were also asked if they felt that their community needed more of any specific type of housing. As shown in Table VII.21 below, around a third of respondents noted that their communities needed more affordable housing. Around 23 percent of respondents stated that they would like to see more single-family housing, 18 percent cited a need for additional apartment/rental units, and 16.7 percent of respondents saw a need for additional lease/purchase options. Approximately 8.4 percent of respondents did not feel that any additional housing was needed in their communities.

Table VII.21
Our community needs more housing in the following areas (please check all that apply)

State of Georgia
 Impediments to Fair Housing: A Neighborhood Survey

Housing	Responses	% of Total
Single Family Housing	95	23.4%
Lease/Purchase Options	68	16.7%
Apartments/Rentals	73	18.0%
Affordable Housing	136	33.5%
More Housing Is Not Needed	34	8.4%
Total	406	100.0%

Respondents were also asked to rank the severity of a number of issues related to employment, housing, and social trends. The manner in which respondents ranked these issues is reported in Table VII.22 on the following page. As shown, a majority of respondents considered each issue to be of at least moderate severity. The only exceptions were questions relating to incomplete kitchen and plumbing facilities; a majority of respondents did not consider these to be an issue. The most serious issues, according to survey respondents were unemployment, poverty, and affordable housing; more than 44 percent of respondents considered these issues to be very

serious. More than a third of respondents also considered substandard housing, cost burden, alcohol/drug abuse, and teenage pregnancy to be very serious issues in their community.

Table VII.22
Please evaluate the severity of each following issue

State of Georgia
Impediments to Fair Housing: A Neighborhood Survey

Issues	Very Serious	Moderate Problem	Not a Problem	Total
Unemployment	93	87	27	207
Homelessness	47	108	54	209
Teenage pregnancy	76	93	31	200
Family violence	62	105	35	202
Affordable housing	94	82	30	206
Lack of day care services	60	88	54	202
Crime	62	112	34	208
Poverty	101	83	23	207
Overcrowding	46	65	89	200
Alcohol/drug abuse	78	101	24	203
Substandard houses	80	82	41	203
Cost Burden	77	87	36	200
Lacks complete kitchen facilities	22	73	99	194
Lacks complete plumbing facilities	19	78	98	195

PERSONAL EXPERIENCE WITH HOUSING DISCRIMINATION

Those who had personally experienced housing discrimination, or who knew someone who had experienced housing discrimination, represented a minority of survey respondents. Nearly 60 percent of respondents stated that they had not experienced housing discrimination, as shown in Table VII.23 below. Just under ten percent of respondents had experienced housing discrimination themselves, 7.2 percent thought they might have experienced discrimination at some point, and 5.8 percent knew someone who had experienced discrimination.

Table VII.23
Have you ever experienced housing discrimination?

State of Georgia
Impediments to Fair Housing: A Neighborhood Survey

Answer	Responses	% of Total
Yes, I have	20	9.6%
I think I may have	15	7.2%
No, I have not	124	59.6%
Yes, I know someone who was	12	5.8%
I think I may know someone who has	2	1.0%
No, I don't know anyone who has	16	7.7%
I do not know	19	9.1%
Total	208	100.0%

Those who had experienced housing discrimination, or who knew someone who had experienced housing discrimination, were asked to describe the discriminatory action. As shown in Table VII.24 on the following page, respondents most commonly reported that housing providers simply refused to rent or deal with a person. Eleven respondents cited different terms and conditions in rental housing, based on the race of the tenant, and ten stated that a housing provider had refused to make reasonable accommodations for a tenant with one or more disabilities.

Table VII.24
If you believe someone you know has encountered housing discrimination, please indicate any of the following

State of Georgia
 Impediments to Fair Housing: A Neighborhood Survey

Discrimination	Responses
Housing provider refuses to rent or deal with a person	18
Different terms and conditions are provided for renting based on race of the tenant	11
Housing provider refuses to make reasonable accommodations for a tenant with one or more disabilities	10
Housing provider falsely denies that housing was available	9
Real Estate Agent directs people to certain neighborhoods	9
Housing lender directs people to certain neighborhoods	7
Real Estate Agent refuses to sell or deal with a person	5
Housing provider uses discriminatory advertising	3
Housing mortgage lender discriminates by denying mortgage	3
Total	75

Among those respondents who reported having some personal experience with housing discrimination, 53 believed that the discrimination they or someone they knew had faced was motivated by race. As shown in Table VII.25 below, 24 felt that the discrimination had been motivated by color, and 23 believe that it was motivated by familial status.

Table VII.25
On what basis do you believe you or the person you know were discriminated against?

State of Georgia
 Impediments to Fair Housing: A Neighborhood Survey

Basis	Responses
Race	53
Color	24
Family Status (single, divorced, children, expecting a child)	23
Disability	7
National Origin	5
Gender	5
Religion	3
Not Applicable	80
Total	200

Only a few of those who had experienced discrimination, or knew someone who had experienced discrimination, reported their experience, as shown in Table VII.26 on the following page. Only eleven had reported the incident, while 47 had not reported it. Thirty-three respondents did not believe that it would make a difference to report the incident, and 14 did not know to whom they should report an instance of housing discrimination.

Table VII.26
If you believe you or someone you know has been subjected to housing discrimination, have you reported the incident?

State of Georgia
 Impediments to Fair Housing: A Neighborhood Survey

Answer	Responses
Yes	11
No	47
Do not know where to report	14
Afraid of retaliation	4
Too much trouble	6
Do not believe it make a difference	33
Total	115

In fact, a majority of respondents did not know how to file a claim of housing discrimination, as show in Table VII.27 below. Only 73 respondents, or 38.6 percent, did know how to file a complaint.

Table VII.27
Are you aware of how to file a fair housing or housing discrimination claim?

State of Georgia
 Impediments to Fair Housing: A Neighborhood Survey

Answer	Responses	% of Total
Yes	73	38.6%
No	116	61.4%
Total	189	100.0%

However, when asked to whom they would address a potential fair housing claim, most correctly identified HUD or the Office of Fair Housing and Equal Opportunity, as shown in Table VII.28 below.

Table VII.28
Where would you file a fair housing claim?

State of Georgia
 Impediments to Fair Housing: A Neighborhood Survey

Answer	Responses	% of Total
The Clerks Office	3	1.7%
Small Claims Court	2	1.1%
Office of Fair Housing and Equal Opportunity	126	72.0%
HUD	44	25.1%
Total	175	100.0%

FAIR HOUSING FORUMS AND PUBLIC INPUT MEETINGS

In addition to the 2015 State of Georgia Fair Housing Survey, the Department of Community Affairs sought the input and participation of stakeholders in the state's non-entitlement areas through several informational meetings. These meetings included fair housing focus groups, a series of six Fair Housing Forums held throughout the state, seven additional 2015 DCA AI Outreach Events, and a series of presentations to the Grantee and Public Housing Authority Outreach Committees. The complete minutes from all presentations are included in the

Appendices; the content of these presentations and subsequent discussions is summarized below.

FAIR HOUSING FOCUS GROUPS

The purpose of the fair housing focus group presentations, held on the 16th and 17th of April 2015, was to introduce stakeholders to the AI process and to discuss preliminary findings from that analysis. Following each presentation, of which there were three, focus group participants discussed a variety of topics relating to fair housing and the challenges facing the state. While a more detailed set of minutes from these meetings are included in the Appendices, the following is a brief summary of the topics discussed at each meeting.

The First Fair Housing Focus Group

At the beginning of the first focus group discussion, many of the comments and questions were designed to clarify various aspects of the AI process and the requirement to affirmatively further fair housing. Additional commentary focused on challenges in home purchase lending, and current weaknesses in the fair housing infrastructure. Participants maintained that the Georgia Commission on Equal Opportunity has been less engaged in fair housing enforcement since its departure from the Fair Housing Assistance Program in 2012. Additionally, participants discussed some of the factors that serve to concentrated affordable housing options in areas with high concentrations of poverty and racial and ethnic minority residents.

Complete minutes from this meeting are included in Appendix C.

The Second Fair Housing Focus Group

The second fair housing focus group discussion began with commenters offering different perspectives on, and requesting clarification of, patterns and trends in home purchase lending. Commenters also weighed in on the recent drop in fair housing complaints, and a representative of the Georgia Commission on Equal Opportunity noted that the agency is currently working to become recertified as a participant in the Fair Housing Assistance Program (FHAP), which will allow it to receive and process more fair housing cases. Another participant noted that fair housing outreach and education is limited outside of Atlanta, which is served by Metro Fair Housing Services, and other entitlement communities. The conversation then turned to various avenues by which policy makers in the state may promote fair housing outreach and education; the need to promote such outreach and education was a recurrent theme throughout the discussion.

Complete minutes from this meeting are included in Appendix D.

The Third Fair Housing Focus Group

The third fair housing focus group discussion began with comments and questions intended to clarify the final action on the AFFH rule and the forthcoming decision in *Texas Department of Housing and Community Affairs v. Inclusive Communities*, both of which were pending at the time of the focus group meeting. The discussion then turned to challenges relating to home mortgage foreclosures, and the failure of investors and property owners to maintain foreclosed

homes. Following the presentation on trends in home mortgage lending, participants discussed what they perceived to be the causes of disparate denial rates among black and white loan applicants, and citing a need for greater education in the use of management of credit.

Following the discussion on home lending, the focus group participants discussed the fair housing infrastructure available to state residents. In this connection, participants noted that a lack of Fair Housing Initiative Program (FHIP) participants throughout the state's non-entitlement areas limits public awareness of fair housing laws and policy and the remedies that are available to those who believe that they have been subjected to illegal discrimination in the housing market. Another participant reiterated that the GCEO was working toward renewing its participation in the FHAP. The discussion ended with participants discussing the need for and challenges to promoting more widespread awareness of fair housing policy, and participation in fair housing surveys, particularly among low-income individuals.

Complete minutes from these meetings are included in Appendix E.

FAIR HOUSING FORUMS

In order to gain the insight and feedback of local stakeholders in the AI process, a series of fair housing forums were held from the 8th through the 11th of June 2015. Hosted by Western Economic Services, LLC, these meetings, which were held in Athens, Blakely, Carrollton, Dalton, Hinesville, and Rome, began with a presentation of data gathered during the AI process, as well as preliminary findings concerning the fair housing challenges facing the state. During and after the presentation, participants were invited to discuss those data and findings, and to offer their own perspectives on them. The following are brief descriptions of the discussions that took place at each forum; the complete minutes from each forum are included in the Appendices.

The Athens Fair Housing Forum

Participants in the fair housing forum began by discussing trends in the migrant and farm worker population before entering a discussion on limitations in the public transit options available to the state's rural residents. Commenters noted that many areas simply lack affordable public transportation options, and that where such options exist, residents and workers often have to rely on a patchwork of services when they need to travel between counties, paying for a new ticket each time they change services.

Complete minutes from this meeting are included in Appendix F.

The Blakely Fair Housing Forum

Participants in the Blakely fair housing forum began by discussing trends and patterns in home purchase lending. Noting that denial rates tended to vary with the race, ethnicity, or sex of the applicant, participants discussed a variety of factors that may contribute to such discrepancies and high denial rates in general, as well as the role of credit counseling and education in combating high denial rates.

Forum participants then turned to a brief discussion of fair housing complaints, with one commenter stating that residents who begin the complaint process will often drop the complaint because they “found some place to live and [they] don’t want to be bothered anymore.” However, other participants maintained that in some cases fair housing investigations have been effectively dropped or ended by the investigator without notification to the complainant, and that complaints have been “lost in the process.”

Participants also maintained that there is a disconnect between government agencies and policy-makers in Atlanta, and that various types of housing and community development funding tend to target the Atlanta area and bypass the remainder of the state. Several participants also voiced their frustration with the failure or inadequacy of previous efforts to address challenges facing the state’s rural areas.

Complete minutes from this meeting are included in Appendix G.

The Carrollton Fair Housing Forum

Participants in the Carrollton fair housing forum began by discussing the survey, with one highlighting a need for public outreach efforts that include a broader group of stakeholders, including members of the general public who are not connected to local or state policy makers or the housing industry, apart from in their capacity as homeowners or renters.

The discussion then turned to some of the challenges facing the city, and rural areas of the state more generally. One participant, a representative of the Georgia Department of Community Affairs, highlighted the work of the Georgia Initiative for Community Housing, inviting participants and interested parties to contact the Initiative to discuss potential avenues for community development. Finally, participants discussed affordable housing, including the criteria and process by which assisted housing is developed and designated as “affordable.”

Complete minutes from this meeting are included in Appendix H.

The Dalton Fair Housing Forum

Participants in the Dalton fair housing forum began the discussion by talking about the fair housing complaint process. One participant noted that those who believe that they have been mistreated are often reluctant to file a fair housing complaint, maintaining that “[t]hey want somebody to help them, but they are intimidated by the whole process and... most of them don’t even realize that they have actually been discriminated against.” In this connection, several participants noted that changes in state-level fair housing enforcement have complicated the complaint process.

Participants also cited a need for increased outreach and education, particularly for established immigrants who may not understand the local housing market, or what the responsibilities of landlords are under Georgia law. The discussion then turned to limitations on the affordable housing stock in the area, and challenges facing the homeless population.

Complete minutes from this meeting are included in Appendix I.

The Hinesville Fair Housing Forum

Participants in the Hinesville fair housing forum began by discussing the survey and the need to promote broader participation in fair housing at the grassroots level. The rest of the discussion revolved around clarification of several aspects of the analysis of impediments process, the data employed in the analysis, and the services available to state residents. A recurrent theme during the discussion was the need for more outreach and education on fair housing policy, and efforts to promote grassroots involvement in policies affecting local jurisdictions.

Complete minutes from this meeting are included in Appendix J.

The Rome Fair Housing Forum

Participants in the Rome fair housing forum began by discussing housing choice vouchers and the common reluctance on the part of landlords to accept those vouchers. The discussion then turned to trends and patterns in home purchase lending, and the need for greater outreach and education concerning credit, particularly how to build and maintain good credit.

Complete minutes from this meeting are included in Appendix K.

2015 DEPARTMENT OF COMMUNITY AFFAIRS OUTREACH EVENTS

In addition to the efforts described above, the Department of Community Affairs (DCA) conducted a series of seven public outreach events from the 20th to the 30th of July 2015. The date, time, and location of each presentation are included in Table VII.29 below. In addition to providing an opportunity to share findings of the 2016 Analysis of Impediments with members of the public, these events ensured that residents of all twelve of the state's service delivery regions had been represented during the public involvement process. The presentations all provided an overview of the AI process, and included information concerning fair housing and the obligation to affirmatively further fair housing. In addition, the presentations offered a summary of the data and discussion included in the AI, along with preliminary results from the survey.

Table VII.29
Local Fair Housing Outreach Events
State of Georgia

Date	City	Venue	Time
July 20, 2015	Waycross	Southern Regional Commission	2:00 PM
July 21, 2015	Sapelo Island	Senior Citizen Center on the Island	9:00 AM
July 24, 2015	Augusta	Augusta Public Housing Authority	10:00 AM
July 27, 2015	Macon	Macon Public Housing Authority	9:00 AM
July 27, 2015	Dublin	Dublin City Hall	2:00 PM
July 29, 2015	Columbus	Columbus Public Housing Authority	10:00 AM
July 30, 2015	Gainesville	Gainesville Public Works/Senior Center Building	10:00 AM

FAIR HOUSING OUTREACH COMMITTEE MEETINGS

The purpose of the Grantee Outreach Committee and Public Housing Authority Outreach Committee presentations was to familiarize officials from local entitlement jurisdictions with the AI process and to discuss ways in which those officials could participate and contribute to the AI process. Commentary at these meetings was typically sparse: to the extent that participants in these meetings offered commentary or questions, the purpose of those comments or questions was mainly to clarify some aspect of the AI process. A series of four meetings, which were conducted via webinar, was held with each committee. Minutes from all meetings are included in Appendix L, for the Public Housing Authority Outreach Committee, and Appendix M for the Grantee Outreach Committee Meetings.

PUBLIC REVIEW PERIOD

The DCA published the draft Analysis of Impediments for public review in late December of 2016. The review period was originally scheduled to run through the 28th of January 2016 to provide 30 days of public review in accordance with HUD guidelines. However, in order to ensure that stakeholders and interested members of the public had an opportunity to fully review the document and provide feedback, the DCA extended the public review period for an additional month, through February 28, 2016. During the public review period, the State received feedback and recommendations from a variety of stakeholders, including representatives of Metro Fair Housing Services, Georgia Legal Services Program, Georgia Advancing Communities Together, the Statewide Independent Living Council of Georgia, and the Atlanta Housing Authority.

SUMMARY

In developing the 2016 State of Georgia Analysis of Impediments to Fair Housing, the state sought the input of stakeholders and members of the public through several channels, including the 2015 Fair Housing Survey, a series of Grantee and Public Housing Authority Outreach Committee Meetings, a series of focus group meetings, a series of Fair Housing Forum presentations held in six cities around the state, and a series of seven 2015 DCA AI Outreach Events, also held in various locations around the state.

The survey received 739 responses, including 197 responses from local government officials, 129 from services providers, and 106 from those who identified themselves as advocate/service providers. Responses to the 2015 Fair Housing Survey reveal that stakeholders in the state are generally aware and supportive of fair housing efforts. However, around 35 percent considered fair housing laws to be difficult to understand or follow, and there was moderate support for the expansion of fair housing laws to prohibit discrimination based on age, criminal status, income, and LGBT status.⁶⁶ Around 35 percent felt that current fair housing laws are not adequately enforced.

More than half of respondents were able to correctly identified “religion”, “gender”, and “family status” as protected classes. On the other hand, a considerable percentage of applicants incorrectly listed “age” and “sexual orientation” as protected classes: neither is protected under

⁶⁶ “Lesbian-Gay-Bisexual-Transgender”

the general provisions of state or federal fair housing laws. More than half of respondents were aware of a fair housing training process available to learn about fair housing laws, and many had participated in such a training process. However, respondents generally did not consider current levels of fair housing outreach and education to be sufficient, nor did they consider current levels of fair housing testing to be adequate. Relatively few were aware of a local fair housing ordinance, regulation, or plan.

In addition to the 2015 Fair Housing Survey, the State also conducted a survey targeting state citizens. Some 247 respondents completed this survey, which asked a range of questions relating to fair housing and the respondents' own experiences with housing discrimination. Around 31.7 percent of respondents considered housing discrimination to be an issue in their communities, though around 43 percent reported that minority residents in their communities lived in segregated neighborhoods. A similar percentage of respondents felt that housing opportunities for persons with disabilities were insufficient. Around 70 percent of respondents did not feel that the current stock of affordable housing in their communities was sufficient.

When asked to evaluate the severity of a range of issues in their communities, respondents ranked unemployment, poverty, and affordable housing to be the most serious issues. More than 44 percent of respondents considered each of these issues to be "very serious".

Respondents who had experienced housing discrimination, or thought that they may have, represented a minority of respondents overall. However, it is worth noting that very few of those who believed that they or someone they knew had experienced discrimination reported the discrimination, and 38.6 percent of respondents did not know how to file a complaint. Among those who stated that they had personally experienced discrimination, the most commonly perceived discriminatory motive was race, followed by color and family status. The most common form of discrimination described by these respondents was refusal on the part of the housing provider to rent or deal with a person.

A series of Fair Housing Outreach Committee meetings were held with representatives of local CDBG grantees and public housing agencies. These meetings were designed to keep local officials up-to-date with the AI as it developed, and to discuss ways in which those officials could participate and contribute to the AI process.

Efforts to promote public involvement during the AI process also included a series of fair housing focus groups, six fair housing forum presentations, and seven fair housing outreach events. Participants in these meetings and subsequent discussions highlighted a wide-range of fair housing issues, including patterns in home purchase lending, the fair housing infrastructure available to state residents, the role of the Georgia Commission on Equal Opportunity in state-level fair housing enforcement, and the need to promote fair housing outreach and education among stakeholders, housing providers, and members of the public.

SECTION VIII. LOCAL APPROACHES TO FAIR HOUSING

In order to develop a more comprehensive portrait of the state of fair housing in the State of Georgia, this analysis has been supplemented by a review of previously submitted analyses of impediments from five local and county entitlement jurisdictions. The purpose of this review is to identify common challenges facing non-entitlement and entitlement jurisdictions in the state, identify any aspects in which the challenges facing each area differ, and to consider differing approaches to affirmatively furthering fair housing at the local, county, and state level.

The five local and county jurisdictions whose analyses of impediments to fair housing choice were included in this review included the cities of Atlanta, Warner Robins, Rome, and Dalton, along with Gwinnett County. There were several criteria guiding the selection of these jurisdictions, including population, demographic composition, location, and administrative level⁶⁷. The following narrative provides a “snapshot” of each entitlement area; including relevant demographic, housing, and administrative characteristics; as well as a summary of identified impediments. Note: Demographic figures cited below were drawn from 2010 Census data, available through the American Factfinder website.⁶⁸

The 2013 City of Atlanta Analysis of Impediments to Fair Housing Choice

At the 2010 Census, the City of Atlanta had a population of just over 420,000. A majority, or 54 percent, of city residents were black while 38 percent were white. Hispanic residents accounted for 5.2 percent of the population. It is the largest city in Georgia, lying in the northwest of the state at the heart of the Atlanta metropolitan area. The city’s code of ordinances has, since 1977, including a fair housing ordinance, which was updated in 1984 and 2000. The city, as well as the greater metropolitan area, is served by Metro Fair Housing Services, a Fair Housing Initiatives Program (FHIP) participant.

In its 2013 AI, the City identified six impediments to fair housing choice: (1) lack of compliance with federal, state, and local Fair Housing Laws within the jurisdiction; (2) lack of knowledge of fair housing protections and redress under fair housing laws; (3) issues affecting persons with disabilities and the homeless; (4) shortage of/barriers to affordable housing and homeownership; (5) concentration of vacant and abandoned residential properties; and (6) fair and equal lending disparities.

The 2011 City of Warner Robins Analysis of Impediments to Fair Housing Choice

The City of Warner Robins had a population of 66,588 in 2010. A majority of city residents, or 53.2 percent, were white, while 37.1 percent were black. Hispanic residents accounted for 7.6 percent of the population in that year. The city lies roughly in the center of the state, just to the south of Macon-Bibb County. City ordinances do not include a fair housing ordinance, and the state is not currently served by a FHIP participant.

⁶⁷ That is, whether the entitlement was a county or city.

⁶⁸ “American Factfinder”. American Factfinder website. Accessed 15 July 2015 at <http://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>.

In its 2011 AI, the City identified a number of potential impediments that were seen to impact or arise from policies and practices in zoning, lending, and enforcement. Under the heading of zoning, the AI cited (1) restrictive residential zones that have the effect of creating neighborhoods that are affordable only to higher-income residents, (2) restrictive zoning for multifamily dwellings, and (3) a lack of definition for “group homes” in local zoning codes. Under the heading of lending, the report cited a discrepancy between the racial composition of the city and the racial composition of private consumer loan applicants, stating that black residents are under-represented in the lending market. Finally, the analysis cited the absence of a local fair housing enforcement agency.

The 2013 City of Rome Analysis of Impediments to Fair Housing Choice

The City of Rome had a population of 36,303 in 2010. White residents represented a majority, or 57.4 percent, of the city’s population while black residents accounted for 27.8 percent. Around 16.2 percent of city residents in that year were Hispanic. The city lies in the northwest of the state, approximately 30 miles to the northwest of the Atlanta metropolitan area.

In its 2013 AI, the city identified five impediments that served to restrict the fair housing choice of city residents: (1) a limited supply of decent, accessible, and affordable housing; (2) uneven distribution of community resources; (3) restrictive zoning provisions; (4) local attitudes resisting fair housing opportunities; and (5) lack of fair housing education.

The 2014 City of Dalton Analysis of Impediments to Fair Housing Choice

The City of Dalton was home to 33,128 residents in 2010. White residents accounted for 65 percent of the city’s population in that year, while black residents represented 6.4 percent. A relatively large percentage of residents identified their race as “other”. Nearly half of the population in that year was Hispanic. The city lies in the northwest of the state, roughly 32 miles to the north-northwest of the northernmost extent of the Atlanta metropolitan area.

In its 2014 Analysis of Impediments, the City identified two impediments to fair housing choice: (1) lack of public transportation options, and (2) lack of fair housing education, testing, and enforcement capacity.

The 2015 Gwinnett County Analysis of Impediments to Fair Housing Choice

Gwinnett County held a population of 805,321 in 2010. A majority, or 53.3 percent, of the population was white, while 23.6 percent of the county’s residents were black. Hispanic residents accounted for just over one-fifth of the population. The county lies within the Atlanta metropolitan area in the north of the state.

In its 2015 AI, the county identified six challenges that serve to restrict the fair housing choice of its residents: (1) a lack of affordable housing supply; (2) accessibility and mobility issues; (3) restrictive zoning provisions; (4) resident viewpoint on affordable housing; (5) deficiency of fair housing education; and (6) underserved populations, stemming in part from the diversity of the county’s population.

DISCUSSION

Many of the challenges and impediments to fair housing choice identified at the local and county level are reflected in those identified at the state level. All of the jurisdictions included in the discussion identified some factor that served to limit the supply or placement of affordable housing units, with the exception of the City of Dalton. In some cases, barriers to affordable housing took the form of restrictive zoning ordinances, as in the cases of Warner Robins and Atlanta. In other cases, NIMBYism and local opposition served to block the development of affordable housing units, as in the cases of Gwinnett County and Rome. These findings are consistent with findings in the state's non-entitlement areas.

Also consistent with impediments observed in non-entitlement areas of the state were challenges associated with a lack of fair housing education and enforcement, as well as the lack of a robust fair housing infrastructure. The cities of Atlanta, Rome, and Dalton all considered the state of local fair housing education to be inadequate, as did Gwinnett County; these areas all identified a lack of fair housing education as an impediment or potential impediment to fair housing choice. In addition, the Cities of Atlanta, Warner Robins, and Dalton all cited a lack of local fair housing enforcement, with Dalton and Warner Robins specifying the lack of a local fair housing organization as a contributing factor.

Additional impediments that were common to at least two entitlement jurisdictions, or to at least one entitlement jurisdiction and the state's non-entitlement areas, included a lack of public transportation options, restrictive zoning provisions, NIMBYism, disparities in home lending, and a variety of challenges facing the population with disabilities.

There were relatively few impediments identified that were particular to a jurisdiction: jurisdictions throughout the state tended to share many of the same challenges and concerns. In some cases, impediments that were apparently unique to a single entitlement area were seen, upon closer examination, to be similar in substance to impediments cited elsewhere.⁶⁹ Examples of impediments that were identified in only one jurisdiction, and which were not included in the list of impediments for the state's non-entitlement areas, included the concentrations of vacant and abandoned residential properties identified in Atlanta, and "underserved populations" in general, cited in the Gwinnett County AI.

A Variety of Approaches

Though many of the challenges and impediments identified were similar from one jurisdiction to the next, the approaches taken to address those impediments often differed considerably depending on the jurisdiction. For example, in Rome, where challenges to affordable housing were primarily characterized as limitations in the supply of affordable units, efforts to promote the development of affordable housing centered on strategies to secure additional funding, to continue funding currently in place, and additional political or material support for the development of low income housing units. The City of Atlanta also placed an emphasis on securing additional funding for affordable housing, but also advocated such measures as the

⁶⁹ Examples include the "uneven distribution of community resources" cited in the 2013 Rome AI. Among the community resources specifically cited in this connection was public transportation, which was a common to several AIs. However, the Rome AI also cited additional resources that were considered to be distributed inequitably, including parks and code enforcement; these were not typically cited in AIs from other jurisdictions.

adoption of an inclusionary housing policy and requirements for affirmative marketing of affordable housing units. The following is a brief summary of select policies and measures taken to address the three most common challenges identified in these studies:

(1) Limitations on the supply of affordable housing units. Several jurisdictions, including Atlanta, Dalton, and Gwinnett County proposed measures designed to secure or continue funding to expand the current stock of affordable housing units. Other proposed actions included the creation of an Inclusionary Housing Policy in Atlanta and the establishment of a counseling program to help Housing Choice Voucher recipients locate housing outside of high poverty/minority areas in Warner Robins.

(2) Lack of fair housing education. Deficiencies in local fair housing education was a common complaint, as were some of the methods proposed to promote a broader knowledge of fair housing law and policy. The centerpiece of Rome’s fair housing education strategy was the proposed allocation of CDBG funding to establish a competitive Fair Housing Grant, which would allow a local organization to provide fair housing training. In Gwinnett County, where such a program was already in place, proposed actions included the continuation of such funding and the adoption of a requirement for the annual review and approval of fair housing curricula to ensure that they are up-to-date. In Atlanta, fair housing education efforts focused on training, continuing education, and public outreach; the dedication of a portion of the City’s website to Fair Housing; and the publication of the analysis of impediments.

(3) Lack of fair housing enforcement and infrastructure. This was a challenge that admitted of a particularly wide range of approaches: In Atlanta, which has a local fair housing ordinance, strategies to promote fair housing enforcement centered on enforcement of the local law, efforts to make the local law “substantially equivalent” to the federal Fair Housing Act, and the development of a referral process for fair housing complaints. In the City of Dalton, proposals included the allocation of CDBG funding to establish a local Fair Housing Grant, part of which would be used to support a fair housing testing program. Warner Robins proposed to address the lack of a local fair housing enforcement organization in part through the creation of a local fair housing agency and the creation of a written policy on how the city will respond to fair housing complaints.

SUMMARY

A survey of analyses of impediments to fair housing choice developed by five entitlement jurisdictions in the state revealed a number of common challenges and impediments to fair housing choice, but also revealed differing perspectives on and approaches to those challenges. The most common challenges included limitations on the supply and placement of affordable housing units, lack of sufficient fair housing education, and a lack of local fair housing enforcement and infrastructure. Other common impediments identified in at least two AIs pertained to public transportation, restrictive zoning provisions, NIMBYism, home lending, and difficulties facing residents with disabilities. All of these issues identified at the local level reflect issues that are present in the state’s non-entitlement areas.

Although the entitlement jurisdictions included in the analyses identified many of the same challenges and impediments, a variety of approaches were developed in addressing these challenges. For example, efforts to promote the development and placement of affordable units

might take the form of increased or continued development funding, or they might include the proposed adoption of inclusionary zoning policies and efforts to combat NIMBYism. Similarly, the need to promote fair housing education was addressed in some cases by the proposed creation of a fair housing grant, and in other cases through marketing and public interest campaigns. Finally, jurisdictions alternately addressed shortcomings fair housing infrastructure and enforcement through proposed strategies to make a local ordinance “substantially equivalent” to the Fair Housing Act, the creation of local fair housing agencies, and the allocation of CDBG funding to support fair housing testing, among other approaches.

SECTION IX. 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.

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 repackages them as mortgage-backed securities for investors.

GAO: U.S. Government Accountability 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.⁷⁰

HMDA: Home Mortgage Disclosure Act

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.

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.

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).

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

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: Occurs when gross housing costs represent 50.1 percent or more of gross household income.

Severe overcrowding: Occurs when a housing unit has more than 1.5 persons per room.

⁷⁰ 12 CFR Part 203, http://www.ffiec.gov/hmda/pdf/regc_020702.pdf

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 State of Georgia Analysis of Impediments to Fair Housing Choice.

APPENDIX A. COMMUNITY REINVESTMENT ACT DATA

Table A.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 Non-Entitlement Areas of Georgia
 2000–2013 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	529	10,719	43,081	16,712	143	71,184
2001	670	12,261	48,608	17,803	96	79,438
2002	738	14,588	56,260	20,310	68	91,964
2003	1,205	15,209	56,075	22,898	53	95,440
2004	1,284	15,271	59,919	24,229	17	100,720
2005	1,147	14,137	57,451	24,974	68	97,777
2006	1,441	20,395	83,583	40,127	38	145,584
2007	1,569	21,422	89,368	43,496	47	155,902
2008	1,138	15,061	64,267	31,884	31	112,381
2009	505	6,113	26,415	12,776	4	45,813
2010	390	5,198	22,637	11,388	5	39,618
2011	514	6,074	26,632	14,335	6	47,561
2012	438	9,428	26,228	16,623	0	52,717
2013	395	8,780	23,665	15,795	0	48,635
Total	11,963	174,656	684,189	313,350	576	1,184,734
Loan Amount (\$1,000s)						
2000	9,082	154,065	620,153	250,194	933	1,034,427
2001	11,469	168,396	721,976	276,547	669	1,179,057
2002	9,795	193,536	780,516	292,958	496	1,277,301
2003	20,530	207,863	774,098	314,376	384	1,317,251
2004	22,084	210,814	812,115	335,922	323	1,381,258
2005	19,995	179,508	714,668	317,368	506	1,232,045
2006	19,635	207,534	854,778	421,430	333	1,503,710
2007	20,682	225,730	924,487	483,526	245	1,654,670
2008	15,677	168,824	700,009	360,158	267	1,244,935
2009	7,694	90,899	364,739	174,736	150	638,218
2010	6,536	70,656	293,088	147,113	126	517,519
2011	9,230	82,210	340,825	188,069	124	620,458
2012	6,826	119,474	298,998	198,000	0	623,298
2013	5,491	123,264	297,435	206,569	0	632,759
Total	184,726	2,202,773	8,497,885	3,966,966	4,556	14,856,906

Table A.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 Non-Entitlement Areas of Georgia
 2000–2013 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	62	634	2,422	1,036	4	4,158
2001	53	846	3,168	1,456	0	5,523
2002	65	817	3,065	1,435	0	5,382
2003	98	858	3,094	1,500	2	5,552
2004	136	905	3,442	1,533	1	6,017
2005	83	700	2,486	1,323	3	4,595
2006	98	662	2,415	1,292	2	4,469
2007	92	682	2,534	1,221	0	4,529
2008	84	634	2,280	1,251	0	4,249
2009	44	451	1,580	779	1	2,855
2010	44	303	1,275	622	1	2,245
2011	54	422	1,461	758	0	2,695
2012	49	548	1,138	718	0	2,453
2013	42	596	1,083	764	0	2,485
Total	1,004	9,058	31,443	15,688	14	57,207
Loan Amount (\$1,000s)						
2000	10,639	98,589	391,105	171,011	572	671,916
2001	9,584	137,598	522,706	243,467	0	913,355
2002	11,644	135,269	504,266	240,998	0	892,177
2003	17,253	142,136	508,551	254,492	353	922,785
2004	23,033	151,845	567,089	259,509	200	1,001,676
2005	14,398	117,025	413,618	225,098	476	770,615
2006	16,433	114,079	402,665	221,599	300	755,076
2007	15,881	117,642	430,572	209,580	0	773,675
2008	14,428	108,510	389,685	220,334	0	732,957
2009	7,647	76,860	269,824	136,889	125	491,345
2010	7,921	52,251	217,787	105,978	125	384,062
2011	10,095	72,388	250,217	130,444	0	463,144
2012	8,425	95,924	193,911	122,583	0	420,843
2013	6,805	101,392	184,425	131,791	0	424,413
Total	174,186	1,521,508	5,246,421	2,673,773	2,151	9,618,039

Table A.3
Small Business Loans Originated: More than \$250,000 by Tract MFI

Non-Entitlement Areas of Georgia
 2000–2013 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	38	349	1,449	728	2	2,566
2001	62	601	2,314	1,144	1	4,122
2002	70	622	2,442	1,097	3	4,234
2003	112	688	2,399	1,342	4	4,545
2004	95	729	2,639	1,378	3	4,844
2005	95	569	2,188	1,210	2	4,064
2006	104	633	2,105	1,213	2	4,057
2007	96	649	2,352	1,311	4	4,412
2008	102	659	2,277	1,270	5	4,313
2009	51	451	1,530	892	3	2,927
2010	39	340	1,367	697	2	2,445
2011	38	391	1,544	828	3	2,804
2012	35	573	1,152	819	0	2,579
2013	37	540	1,103	784	0	2,464
Total	974	7,794	26,861	14,713	34	50,376
Loan Amount (\$1,000s)						
2000	19,474	172,645	698,446	354,432	877	1,245,874
2001	32,303	287,261	1,138,466	564,939	650	2,023,619
2002	34,658	301,264	1,223,512	555,027	1,438	2,115,899
2003	58,979	351,362	1,200,857	679,368	1,990	2,292,556
2004	48,595	370,383	1,295,167	698,279	1,571	2,413,995
2005	49,249	283,833	1,092,344	623,719	885	2,050,030
2006	54,510	324,098	1,086,439	613,600	994	2,079,641
2007	47,415	331,979	1,189,949	672,902	3,000	2,245,245
2008	50,105	333,005	1,167,961	648,475	3,269	2,202,815
2009	25,972	235,516	778,096	460,123	2,087	1,501,794
2010	21,992	181,222	692,099	360,717	1,836	1,257,866
2011	21,050	198,748	788,433	435,660	2,105	1,445,996
2012	19,229	292,746	585,352	407,713	0	1,305,040
2013	18,623	277,752	572,804	415,038	0	1,284,217
Total	502,154	3,941,814	13,509,925	7,489,992	20,702	25,464,587

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

Non-Entitlement Areas of Georgia
 2000–2013 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	283	5,636	24,233	9,069	10	39,231
2001	391	7,165	29,565	10,864	6	47,991
2002	296	6,667	27,189	9,692	7	43,851
2003	633	8,013	30,493	11,955	4	51,098
2004	693	8,453	34,612	12,862	9	56,629
2005	643	7,989	33,527	14,274	11	56,444
2006	699	9,051	37,080	16,962	8	63,800
2007	679	9,512	39,486	18,565	10	68,252
2008	506	6,035	25,516	11,692	0	43,749
2009	178	3,117	12,727	5,377	1	21,400
2010	146	2,510	10,660	4,646	1	17,963
2011	291	3,468	15,325	8,231	0	27,315
2012	265	4,797	13,739	9,098	0	27,899
2013	248	4,869	13,870	9,446	0	28,433
Total	5,951	87,282	348,022	152,733	67	594,055
Loan Amount (\$1,000s)						
2000	18,103	260,384	1,125,606	511,898	1,672	1,917,663
2001	27,047	395,881	1,639,273	730,512	177	2,792,890
2002	22,705	406,464	1,654,713	691,322	707	2,775,911
2003	49,739	446,290	1,681,343	788,492	816	2,966,680
2004	49,034	481,996	1,878,889	815,313	959	3,226,191
2005	45,330	367,358	1,491,716	707,109	441	2,611,954
2006	51,850	385,669	1,477,758	724,991	225	2,640,493
2007	47,119	367,650	1,463,681	749,847	587	2,628,884
2008	45,009	311,812	1,255,687	612,114	0	2,224,622
2009	15,941	216,661	794,676	404,974	1	1,432,253
2010	12,178	158,764	692,513	310,794	8	1,174,257
2011	17,092	189,604	753,991	396,614	0	1,357,301
2012	20,176	250,540	564,462	377,264	0	1,212,442
2013	18,871	230,002	518,182	354,441	0	1,121,496
Total	440,194	4,469,075	16,992,490	8,175,685	5,593	30,083,037

APPENDIX 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?

The State of Georgia
 2015 Fair Housing Survey Data

Comments:
Fair housing department HUD Fair Hosuing ? 1-800-669-9777 1. Dept. of Housing and Urban Development Fair Housing Division 2. Georgia Commission on Equal Opportunity 3. Metro Fair Housing Services, Inc. A lawyer or our Regional Commission a lawyer to first insure their understanding of the mistreatment is truly covered by the law. absolutely ACLU Legal services an attorney An attorney An Attorney An attorney or DCA Atlanta - Metro Fair Housing or HUD Atlanta Legal Aid Atlanta Legal AID Atlanta Legal Aid or Georgia Legal Aid Georgia Advocacy Office HUD Atlanta Legal Aid, Cobb office Office of Equal Opportunity HUD Atlanta Legal Aid, DCA attorney Attorney ATTORNEY Attorney General's Office Attorney Generals Office Better Business Bureau City of Albany Housing Counseling Agency, Georgia Equal Opportunity Office or www.hud.gov/fairhousing City or County Attorney Community and Economic Development Congressman County Administrator County commision County Commissioners Office County Housing Authority DA Dalton Whitfield Community Development Corporation Dca DCA DCA Ga. State Government DCA HUD Justice Department DCA or GCOE DCA or HUD DCA or HUD or in our case, the Ga Legal Services lawyer who comes to our offices 1 x month to do pro bono work DCA website DCA, HUD DCA, Legal Aid or Civil Rights Commission. Or local housing authority (if public housing) DCA, Local Housing Authority DCA! Legal Aid, local housing authority, or other advocacy organization. DCA? Departmen of Community affairs. Legal aid. HUD Department of Community Affairs Department of Community Affairs ASPIRE Clinic (legal advice) UGA campus Legal Aid Department of Consumer Affairs Department of Fair Housing Department of Housing & Urban Development department of housing and urban affairs Department of Housing and Urban Development Department of Housing and Urban Development Fair Housing Department Department of Housing and Urban Development or a lawyer Department of Justice

Department of Justice or HUD
 dept of banking
 DEPT OF HUMAN SERVICES AND DEPT OF COMMUNITY AFFAIRS
 Dept. of Community Affairs, State govt.
 Dept. of Housing and Urban Development
 Dept. of Housing and Urban Development Fair Housing Division Georgia Commission on Equal Opportunity, Fair Housing Division
 Metro Fair Housing Services, Inc.
 Dept. of Justice
 Disability Agency
 District attorney
 doj
 Don't know
 DON'T KNOW
 Don't know - there is not Housing Authority in Effingham County
 Don't know as need has not arisen
 Don't know. And thats a shame and a problem.
 DWCDC or Georgia Legal Aid
 EEOC or HUD office of FH&EO
 Either to DCA or HUD Directly
 Equal Opportunity
 Fair Housing
 FAIR HOUSING
 Fair Housing Attorney
 Fair Housing Authority
 Fair Housing Commission or HUD
 Fair housing complaints can be filed with HUD by telephone (1-800-669-9777), mail, or via the Internet.
 Fair Housing Council
 Fair Housing Council and GLSP
 Fair Housing Council of Savannah
 Fair housing division at DCA
 Fair Housing Hotline
 fair housing office
 Fair Housing Office or Metro Fair Housing
 Fair Housing Programs to report the discrimination.
 FDIC
 Federal Fair Housing website
 Federal Government
 FHA
 FHEO
 file a complaint with HUD
 First to DCA Office
 First to the business to see if the problem could be resolved with more information/communication, then the Local Fair Housing office.
 GA Advocacy Office
 Ga Commission on Equal Opportunity
 GA Fair Housing
 GA Law Center for the Homeless
 Ga Legal
 Ga Legal Service
 GA Legal Services
 Ga Legal Services or Ga Commission of Equal Opportunity
 Ga Real estate commission
 Ga. Department of Community Affairs
 Ga. Dept of Comm Affairs
 GCA
 GCEO
 GEOC
 Georgia Comm. on Equal Opportunity
 Georgia Commission for Equal Opportunity
 Georgia commission on equal opportunity
 Georgia Commission on Equal Opportunity
 Georgia Department of Community Affairs Georgia Commission on Equal Opportunity
 Georgia Department of Community Affairs
 Georgia Law Center for the Homeless
 Georgia Legal -- non-profit agency
 georgia legal services
 Georgia Legal Services
 Georgia Legal Services Savannah Justice Law Center
 Georgia Legal Services or a private attorney if I felt the case had the merits that would interest a private attorney
 Georgia Real Estate Commission
 Georgia Real Estate Commission, HUD, District Attorney, Justice Department, Government Official, such as Mayor, State Legislature....
 GHFA or GDCA

GLSP
 Governing Authority
 governor
 Governor's office
 Governors Office
 Great Question
 have no idea
 Housing authority
 Housing Authority
 HOUSING COUNSELING AGENCY, STATE FAIR HOUSING, HUD
 housing counselor
 Housing Discrimination Hotline 1-800-669-9777
 hud
 Hud
 HUD
 HUD - Fair housing enforcement
 HUD and Georgia Commission on Equal Opportunity
 HUD and local fair housing agencies
 HUD and/or local fair housing authority/agency
 HUD Atlanta Field Office GA Department of Community Affairs
 HUD Fair housing
 HUD Fair Housing
 HUD fair Housing office
 HUD Fair Housing WEB site.
 HUD FHEO
 HUD FHEO Complaint Line, Georgia Equal Opportunity Commission, or their Local Housing Authority.
 HUD Field Office (Fair Housing)
 HUD has an online form
 HUD office
 HUD OFFICE NEAREST THEM
 HUD office, Fair Housing Atlanta
 HUD or Atlanta Regional Office
 HUD or city government
 HUD or DOJ Civil Rights division
 HUD or Georgia DCA
 HUD or state/local fair housing enforcement agencies.
 HUD or the relevant enforcement agency in Georgia
 hud Regional Office
 HUD Regional Office Local Housing Authority Georgia Commission on Equal Opportunity
 HUD website
 HUD website or leagal aid
 HUD website to file on-line
 HUD- to stop discrimination
 HUD, DOJ
 HUD, Fair Housing or the local Housing Authority for local information
 HUD, Legal Aid, I would call a friend!!
 HUD, STATE FAIR HOUSING DEPARTMENT, CERTIFIED HOUSING COUNSELING AGENCY
 HUD.gov
 HUD's Fair Housing Site
 HUD/ or a HUD counseling agency
 I am unsure of the fair housing protocols in our county.
 I don't know
 I don't know who to refer them to.
 I have no idea
 I will send them this information and as well to try to see can things get solve this way before they take another actions,
 I would recommend that they file a complaint with the local HUD Fair Housing Office; and offer to assist them in obtaining the proper forms if they didn't know how.
 I would refer them to the fair housing office in Atlanta
 I wouldn't - I would encourage them to work with the organization they felt violated by - before encouraging them to bring in outside parties
 I'd go online to make a complaint.
 I'd have to hear the nature of the complaint first. If it sounded legitimate, I suppose HUD.
 In Athens-Clarke County, to the Housing and Community Development Department. Outside of ACC, to HUD or Community Connection.
 In LaGrange, Ga. I am not sure, except responding to eviction notices in court
 In Macon, HomeFirst, ECDD, Macon Housing Authority, and ultimately HUD
 Initially, Savannah-Chatham County Fair Housing Council or Metro Fair Housing Services; then HUD
 It depends on where they are and if they are working with a nonprofit that can help them through the process. A key place, though, would be the HUD website where you can report violations.
 J C Vision
 J C Vision and Associates, Hinesville
 Jackson Housing Authority, HUD Website
 JC Vision in Hinesville or HUD website

JCVision and Associates, Inc. (the organization is a FHIP)
 legal aid
 Legal aid
 Legal Aid
 Legal Aid Housing Authority
 legal aid or the GA Bar Association
 Legal aide
 Legal counsel
 legal services
 Legal services and the fair housing office in Atlanta
 local fair housing center or HUD
 local fair housing office
 Local Homeless Program Manager, Chair of Housing Coalition
 Local Housing & Community Development Department
 Local Housing Authority
 Local housing authority for procedures
 Local HUD Office
 Local nonprofit, JC Vision and associates
 Local Public Housing for information to file a compliant
 local, state, and if no resolution federal level
 Metro Atlanta Fair Housing
 Metro Atlanta Fair Housing Services Atlanta Legal Aid Society Atlanta Bar Association Attorney Referral Service
 Metro Fair Housing
 Metro Fair Housing Agency HUD Fair Housing Dept
 Metro Fair Housing in East Point, GA
 Metro Fair Housing of Atlanta
 Metro Fair Housing or HUD - I think there is an online complaint function.
 Metro Fair Housing or the DCA Fair Housing unit, if not resolved then to HUD housing discrimination unit
 Metro Fair Housing Service
 Metro Fair Housing Services
 Metro Fair Housing Services, INC.
 Metro Fair Housing Services, INC.
 Metro Fair Housing, Inc.
 Metro Fair Housing, Inc. or a fair housing legal defense service
 Metro Fair Housing; Georgia Legal Services; Legal Aid; Volunteer Lawyers Association
 N?A
 Nearest HUD office
 No idea
 not really sure
 not sure
 Not sure
 Not Sure
 Office of Fair Housing
 Office of Fair Housing and Equal Opportunity
 Office of Fair Housing at HUD/Atlanta Office
 ombudsman office
 our fair housing contact in Atlanta
 Police.
 Probably dca
 Regional manager.
 Savannah Chatham Fair Housing Council or Georgia Legal Services
 Savannah Fair Housing Council or EOA Housing Counseling Program or HUD
 Savannah Fair Housing Office or Metro Fair Housing
 Savannah has a fair housing office
 Savannah-Chatham Fair Housing Council
 Savannah, Georgia
 start with Housing Authority, then DCA, then HUD
 State Attorney Generals office
 State DCA office
 state fair housing office or legal; services
 State Housing Authority
 State of Georgia Fair Housing Department's link can be found online which provides an address and phone number for complaints.
 State or Federal (HUD) office
 state or federal housing agency or district attorney's office/DOJ
 SWGRC
 Tenant Landlord Court
 The Bank's Complaint hotline or the Fair Lending Dept.
 The DCA
 The Department of Housing and Urban Development
 The Fair Housing of HUD.gov or telephone #'s listed on brochures in office(GA & additional 800#'s
 The Fair Housing Office
 The HUD
 The Savannah-Chatham Fair Housing Council, Inc. or to HUD.

The the local HUD office
 The U.S. Department of Housing & Urban Development
 their local attorney'
 to a case worker
 to agency first, then move up the letter. Finding out what would be the next step.
 to an attorney
 To an organization that provide fair housing services.
 to HUD
 to HUD or fair housing office to Wayne Dawson
 To my transition coordinator (Region 6)
 To our local COC/city or NACA.
 To our upper level management staff to see if we could help to remedy their issues/concerns
 To the Fair Housing division of HUD
 To the HUD portal
 To their local fair housing agency or any other housing agency that takes complaints
 U.S. Department of Housing & Urban Development Atlanta Field Office
 U.S. Department of Housing and Urban Development
 U.S. Dept of Housing and Development
 USDA Rural Development
 US Dept of Housing and Urban Development
 USDA Rural Develope or Ga. Cares
 USDA, Civil Rights or HUD Management Company
 Various places
 Warren County Housing Authority
 We refer to Metro Fair Housing's Fair Housing Hotline

Table B.2
What "Other" type of Tenure are you?

The State of Georgia
 2015 Fair Housing Survey Data

Comments:
Municipality
ACT Case Manager
Advocate
Agency
Agency employee
APARTMENT MANAGER OF PROPERTY
Area Agency on Aging
Assisted Housing Professional
Authority
Board member of CDC
Case Manager
Case Worker
City Clerk
city employee
City Manager
City of Gainesville
city official
city personnel
City personnel
CITY STAFF
Community Service Agency
compliance
Contractor
Coordinator
County Coordinator
CSB
developer
Developer
Developer/manager
Developer/Owner - Multifamily
Direct services delivery
Director of a Nonprofit
Director of Homeless Shelter
Director-Planning and Development
disability advocate
disability advocate without a disability
Disable city official
Domestic Violence Shelter
DV Shelter
Elected official
Employee of Government

Executive Director
 Executive Director - Public Housing
 General Contractor
 Grant Administrator
 grant administrator and writer
 Habitat for Humanity
 Homeless
 homeless service provider
 homeless shelter
 Housing Authority
 housing authority director
 Housing Authority Employee
 Housing manager
 Housing Program Administrator
 housing program manager
 Housing services for people with disabilities
 HUD Funded Agency
 LAND OWNER
 landlord
 lease from County
 legal services provider
 Lender
 LG
 live at home
 Live on property non-rev unit
 Live with family
 Live with parents
 Living with my Parents
 ||||||||||||||||||||||||||||||||||||||||||
 local elected official
 Local gov
 local government
 Local Govt
 low rent public housing manager
 Management Company
 manager
 Market Analyst
 Mental Health Provider
 military base living (Fort Stewart)
 mortgage lender
 municipal employee
 Municipal Government
 municipality
 Municipality
 N/A
 neither
 Non Peofit
 non profit
 Non profit housing provider
 Non Profit Service Provider
 non-profit
 non-profit agency
 Non-Profit housing Counseling Agency
 Non-Profit Housing Leader
 Non-profit transitional housing program
 nonprofit
 Nonprofit housing counselor and affordable housing developer
 office assistant to owner
 Onsite
 owner
 Owner
 Owner/developer
 Owner/Developer
 PHA
 PHA Director
 professional
 Program coordinator
 prop mgr
 Property Managemant Company
 property management
 Property management
 Property Management
 Property Management Company

Property manager
 Property Manager
 Property Mananger
 Property Mgt Company
 Provider
 PSH owner/operator
 Public Housing
 Public Housing Agency
 Public Housing Director
 Public housing management
 Public housing manager
 public official
 Publid Housing Authority
 Referral Source
 Rental property owner
 Residential Manager for Master Leasing Programs
 See above.
 service provider
 Service provider
 Service Provider
 Service Provider (Emergency Shelter)
 Service Provider Agency
 Service Provider of rental assistance and security deposits
 shelter for domestic violence
 stakeholder
 Support Manager
 Supportive Housing
 transitional housing
 Transitional Housing

Table B.3
How did you become aware of fair housing laws?

The State of Georgia
 2015 Fair Housing Survey Data

Comments:
<p>I remember when the Fair Housing Law was first adopted. 21 years of practicing law and volunteering for Georgia Legal Services 25 + Years in the industry, Several Fair Housing classes 40+ years experience in mortgage industry 6+ years of developing multifamily housing Advocacy work led me to research the laws. Annual requirement of my employer, Walton Communities, to complete a Fair Housing training class or online class. Annual training, conferences, seminars As a homeowner going through the process as well as reading over my own leases prior to. Currently, I am learning as issues arise with my clients. As a lender, we refresh on all lending laws annually As a LIHTC developer we have seminars on fair housing as a previous mortgage lender and now as a housing advocate As a property manager, I absolutely HAVE to know and understand the Fair Housing Laws As a provider of affordable housing we complete training in fair housing at least annually. We are under the regulations of HUD As a rental property owner, it was necessary to become familiar with the laws governing rental property. As a social worker, I work with local agencies to find people stable housing. As a trained ED of a Housing Authority As an advocate for a center for independent living and several years of experience. As an Entitlement Community it is our duty to Further Fair Housing through community education. As Director of the Gwinnett County Community Development Program, the office managing Gwinnett County's HUD grant portfolio, it is my responsibility to be well versed in fair housing laws to ensure full compliance with the County's grant funds. Attend company and industry fair housing training regularly Attended a seminar at the Department of Community Affairs on Fair Housing. attended a training (DCA) also through advocacy for clients attended fair housing workshops attended meetings presented by Fair Housing Attended seminars and training on fair housing to stay abreast of the current laws and possible law changes Attended workshop where Fair Housing Laws were discussed both at the federal level and state level Attending Fair Housing Seminar and on the Web. Attending meetings and assisting with housing needs in the community- I am sure there is Much more I need to know or readily identify aware of the different forms of housing and some of the voucher programs. BBA, Real Estate, Associational cont. Ed. Became familiar through my work at finding Shelter + Care Housing and other housing for clients. Been in the field for 20 years. Been working in this industry for years and have attended numerous trainings</p>

brochure
 By being a member of Savannah Fair Housing Council
 By sitting in on some of the meetings held by the Program Managers of Emergency Shelter and Permanent Supportive Housing.
 By working on the Board of Directors of Savannah Fair Housing Council
 CDBG Program
 City of Hinesville Community Development Department programming
 College.
 Compliance and lending law departments
 CONTACT WITH DCA
 Dalton Whitfield Community Development Corporation
 DCA
 DCA Messages.
 DCA workshops
 DCA, work, HUD
 Dealing with certain projects which are affected by Fair Housing
 Decades of experience in housing development.
 Due to my job with HUD
 Employment Training Seminars
 Executive Director of a Public Housing Agency
 experience
 Experience over the years
 Experience working in housing programs and assisting families in obtaining and maintaining housing
 Fair Housing classes
 Fair Housing Classes Fair Housing Guidebook
 Fair housing laws are civil rights laws. Housing discrimination not only restricts housing choice, but it can be a painful, humiliating, and costly experience for any individual or family.
 Fair Housing Training
 Fair housing training is required by HUD.
 FH Training provided by HUD & National Fair Housing Alliance (NFHA)
 FROM RESEARCH ONLINE TO HELP CLIENTS
 Georgia Department Of Community Affairs
 Grace Hill training less than 30 days ago
 Have attended many trainings.
 Have land within city limits and developer but city council votes down for PUD zoning due primarily to race. 2 White council vote against and 1 Black votes for.....
 have owned rental property in the past
 Have read documents regarding fair housing laws.
 Having worked in various planning departments that supported housing authority initiatives.
 Housing authority training
 Housing compliance for HUD housing
 Housing Conference, trainings, working with homeless
 Housing Grant administration
 I administer CDBG and HOME funds
 I have worked in the housing industry for over forty years. Working with public housing, state funded programs, federal programs, and neighborhood builders. Tenant and landlord mediation and support
 I am a certified housing counselor
 I am a city planner with a specialization in land use.
 I am a city planner, so I need to be familiar with them when developing new ordinances and reviewing development.
 I am aware of protected classes and can't really remember the first time I was introduced to "Fair Housing". I have been working with homeless persons for 18 years.
 I am aware there are a number of laws that protect against housing discrimination I am also aware of a number of housing discrimination issues that have occurred in our area.
 I am employed with a non-profit organization.
 I became aware of fair housing laws through job training.
 I became aware of fair housing laws through training for my position.
 I became aware through local discharge/admission planners
 I became aware through my employment.
 I have 18 years of apartment management experience including fair housing training.
 I have assisted clients with disabilities with fair housing claims.
 I have attended many Fair Housing training and now I make sure we have a fair housing component in our housing counseling program. This is very important for us because we serve low income refugees who speak other languages other than English at home.
 I have been involved in discussing housing for poor people and people with disabilities for over 20 years
 I have been operating permanent supportive housing for 15 years
 I have read literature regarding fair housing and use it as a guideline for our agency.
 I have received education on fair housing for my current job.
 I have worked with affordable housing organizations for over 20 years.
 I interned at the Equal Rights Center in DC.
 I know that it is illegal to discriminate in rental housing based on color, race, gender, family status and disability
 I know that you cannot discriminate against race, sex, etc.
 I learned in junior high civics class about laws against discrimination. I am also politically aware, and I've had several discussions about housing access, zoning, duties of real estate agents, and anti-discrimination legislation.
 I learned through numerous classes and workshops in conjunction with my job description.

I provided training on Fair Housing as President's of the National Federation of Housing Counselors, the National Association of Housing Counselors and Agencies, The American Homeownership Counseling and Training Institute. I have been on the Board of the Savannah Fair Housing Council for over 10 years and attended training on testing and education of fair housing. I helped develop housing training manuals for NFHC, NAHCA and AHECTI which included Fair housing laws dating back to the 1800's. I read articles about them, studied the laws and attended training in fair housing and fair lending. I have helped other people know their rights.

I read some of the laws to provide them to renters who discriminate on our consumes based on their mental health or addiction history

I remember when President Johnson signed the "Open Housing" Bill, in fact, the first home my husband and I bought was in Lathrup Village, Michigan. The original covenants of the deed stated that "No Jews, Negroes or Large Dogs" were allowed to live in Lathrup Villiage.I have that deed today. As Jews were were always aware of discrimination in Housing and Schools. When we were transferred from the DC Metro area to Atlanta in 1986 the Realtor showing me homes was Steering me away from certain areas of Atlanta, specifically Buckhead, where I had asked to look. We had more than enough moneyto afford any home there and i knew for a fact that those homes were available, but every home she showed me was not what I needed or wanted. I had never encountered this before, and this was my 18th move, so it took me a while to figure it out. She told me I would probably be happier with "my own kind" in Sandy Springs. Fortunately, her husband worked for mine, so he spojke to his partner and they fired him the next day after it became clear that he saw nothing wrong with what his wife said to me, and I got a new Reealtor who helped me find a perfect home. As a Realtor I am very carefull to not engage in any discussion about neighborhood or city demographics. I will show them the homes that match what they want, and always make sure they tell me where they want to live, where they will be working,spending limits, anything pertaining to location or demographics, instead of suggesting where they should live. I have kept up with the issue and am proud of the Licence Law that has severe penalties for violating Fair Housing Laws.

I supervise the S+C Grant at the agency

I was a Fair Housing Advocate with a legal services provider in the state of Florida.

I was a Property management professional for 25 years

I work at Housing Authority

I work for the Municipal Government

I work for the Savannah-Chatham County Fair Housing Council. I have been trained in all aspects of the Fair Housing Act as amended.

I work in Public Housing

I work with a transitional housing program, so we are certainly familiar with laws regarding fair housing.

I work with JCVision and Associates, Inc., a non-profit, Fair Housing Initiative Program (FHIP)

I worked on the regulations with regard to multi-family properties many years ago!

I'm a lawyer and own a property management company.

I've attended Fair Housing training opportunities offered by HUD and Metro Fair Housing.

I've previously done internet research.

I've taken HUD's Fair Housing Seminars and classes

In my role at work I coordinate with the DCA.

In capacity as a Municipal Advisor

In my employment

In my profession as a lawyer, and in general.

In my work with Homeless Clients, Housing Georgia and personal experiences.

in part through Fair Housing Council; also through reading and discussing housing issues with other advocates.

In providing services for victims for crime and helping them obtain housing.

In the 1960's when they were passed by Congress.

In the work I do.

In working for a housing non-profit and selecting applicant families.

Individuals cannot be discriminated upon when it comes to renting or buying a home, ie, race, disability

Industry Regulations

Industry training for over 20 years

industry updates

internet

It's part of my job

Job

Job Trainin

Law school, law practice.

Law school; training from someone at DCA on fair housing laws in 2013

Lawyer, worked with local fair housing council

Lender training.

Lifetime of work in issues related to people who have disabilities

Literature and court cases.

Local government employee Wife is a realtor

local government

Local Government

local government administrator working in building inspection and zoning office

Lots of industry training

Many many DCA and private compliance trainings needed to maintain various credentials

Meetings etc.

Multiple FH training

My coursework in the UGA School of Social Work

My legal training is in Civil rights law. I was an advisor to Congressional Staff when the 1988 FHAA was passed, and I teach fair housing law across the country.

My office administers affordable housing grant programs utilizing CDBG, HOME, and CDBG dollars. As a part of the administration it is imperative that I have a full knowledge of what the Fair Housing Act, and proposed Affirmatively Furthering Fair Housing Rule,

state.
 news
 news media
 on the job research
 Once worked for Atlanta Housing Authority
 Ongoing training and education
 Online courses
 Only by working with the Georgia Hosing Voucher Program
 Our agency provides advocacy services to low income families who rent
 our corporate office training and testing
 Our organization provides annual, fair housing training for all staff members.
 Over 30 years in public housing ownership and management. Have attended training programs as well as read regulations on the subject.
 Owner & Architect passed info along
 participated in online training sessions
 Participation in Fair Housing Training through Metro Fair Housing Services, Inc.
 Partnering with DCA
 Partnership with Dalton Whitfield Community Development Center
 Personal experience
 Personal experience as a renter and issues faced by residents in our program.
 Personal experience in looking for accessible housing.
 Practitioner in Section 8, Tax Credit and Public Housing
 Preparing the Analysis of Impediments to Fair Housing for Macon-Bibb County.
 Professional requirements
 property management
 Property Management Industry and yearly training requirement
 Public Housing is governed fair housing laws.
 Read up on the fair housing laws from the HUD Website and a recent Civil Rights training.
 Reading the laws
 Reading what was on website and word of mouth
 Real Estate courses
 Required course to initially receive real estate license and continuing education.
 Research
 researching particular aspects to help clients
 Savannah-Chatham Fair Housing Council
 Seminars and workshops
 Shelter Plus Care conference
 Social work
 Some mention in continuing education courses over the years. Minor exposure in my work.
 Studying the Georgia Fair Housing Act
 studying to buy a house recently
 Take advantage of the free courses.
 The City of Rockmart consolidated its Housing Authorities with the Rome/Floyd County housing Authority in the mid 1990's and formed what is now the NWGHA. This consolidation and the cooperation between staff members has provided educational opportunities and has allowed both cities to develop needed and much wanted housing opportunities for those who can not afford or can obtain a personal home loan. If you want to see a "success story" and one that has helped improve the quality of life for hundreds if not thousands this is one to clone. Ms. Hudson and her staff as well as my Community Development Director in Rockmart have a total team effort and a track record of success.
 The Dodd Frank Preparation Class
 The laws apply to my work.
 Through a past supervisor
 Through administration of Title 1 funding and our partnership with local housing authority
 Through building apartments
 through CDBG workshops and manuals
 Through DCA trainings.
 Through education provided by my employer
 Through Gelorgia Legal Services and GCADV
 Through information received at the local government level; however this information is usually not relevant in our case because we are not involved in this area of government.
 Through Locao Agencies
 Through many training seminars and courses by governmental agencies and private consultants for many years.
 Through my business working in housing finance
 Through my employer and attending meetings/trainings held throughout the state of Georgia.
 Through my involvement with low income families and individuals while advocating for their rental assistance and prevention of eviction.
 Through my job as a social worker, talking with clients and reviewing the website.
 Through my job with working with a DCA grant.
 Through my job.
 Through my position in the public housing sector
 Through my profession
 Through my work as a housing counselor.
 Through my work as a paralegal
 Through personal experience and professional experience

Through professional seminars and everyday practices
 through property management and training
 Through providing transitional housing services to survivors of domestic violence as well as real estate education.
 Through service in local government.
 Through the local government in Ellaville, GA
 Through the Money Follows the person program, CCSP and SOURCE
 Through the RE licensing process, and a continuing education class recently.
 Through training
 Through WIA services
 Through work
 Through work at previous housing provider, a 501c3 non profit
 Through working with placing client into housing.
 Through working with projects dealing with housing and those funded by HUD
 Through workshops
 thru workshops provided by Augusta/Richmond county
 Thru Ninth District
 took two real estate courses
 training
 Training
 training and educational seminars
 Training and experience
 training and going through the process of discrimination my self.
 Training as County Commissioner and Econ Dev training for IDA
 Training at Conferences, Individual Training, etc
 training classes
 Training Courses - Grace Hill, AJJohnson, Spectrum, RD, Zeffert and Associates, SAHMA
 Training for job
 Training from National Experts
 training programs
 Training thru Metro Fair Housing
 Training with DCA
 Training, professional experience
 trainings
 Trainings on the issue.
 Trainings with various providers, HUD, DCA, Legal Aid
 Trainings, Seminars and Workshops
 Trying to find homes for clients
 Trying to place families into housing.
 tv
 Via HUD grants process and program implementation
 Via training on the topic and reading on the topic.
 We are required to take yearly tests to make sure we are aware of the laws and any changes that may have taken place.
 We deal with it ever day with thousands of applicants
 We had fair housing training at our agency.
 We have been working in the property management industry for over 20 years and attend fair housing seminars several times a year.
 We use them to assist clients and/or file complaints when violated.
 When I got into the program with Community Affairs
 When I started working as an advocate in 2009
 When my non-profit organization attempted to purchase property for use as a group home for individuals with disabilities
 work
 Work closely with housing authority on a couple of projects.
 work in property management
 work through housing stability committee
 Work with Community Development and Grants.
 Worked for a member of Congress, live in a condo and researched issues.
 Worked in Community Action and provided supportive housing and helped persons in danger of homelessness through eviction prevention activities.
 Working at a homeless shelter that assist homeless clients in obtaining affordable housing.
 Working at tax credit communities
 Working at the housing authority.
 Working for Atlanta Housing Authority
 Working in housing industry for over 18 yrs
 Working with community advocacy groups and listening to comments of residents.
 Working with DCA/Section 8 and the Georgia Housing Voucher Programs.
 Working with housing clients and discovering that they had not been advised correctly (or at all) and leading them through the process of addressing that fact.
 Working with HUD property
 working with individuals with disabilities looking for housing. working with Wayne Dawson on fair housing
 working with local Center for Independent Living as a volunteer

Table B.4
How should fair housing laws be changed?

The State of Georgia
 2015 Fair Housing Survey Data

Comments:
Age Age (due to the increasing number of baby boomers and elderly residing in our state). Age and Income Age and Sexual Orientation age should be a protected class. Persons over the age of 60 should be allowed to live in special communities with facilities for caregivers that are not elderly. All age groups (renters with or without children/ young and old adults) and persons with language barriers All of The above. ANY ONE WHO IS ELIGIBLE Convicted felons Culture groups disabled and hard to house citizens Disabled Veterans, Elderly Don't know if they are protected by LGBT perhaps? also formerly incarcerated individuals Elderly Felons who have completed their rehabilitation Disabled people who receive monthly financial assistance gays and lesbians, poor people who receive subsidies (section 8 vouchers, welfare, food stamps, etc.) gen Genda, Age, Income Gender Gender identification or sexual orientation. Gender Identity; Sexual Orientation; Familial Status Gender Identity. Sexual Orientation GLBT people handicap needs to be clarified for uniform application Homeless Homeless and persons with criminal records (no major felonies) Homeless, convicted felons, youth, people with poor credit scores homeowners in condo associations, longterm rental residents, elderly Household with housing choice vouchers I am not sure "new groups" fits the description, but people with old criminal (not serious crimes), the mentally ill, and those recovery, all actively attending treatment should have the same ability to rent a house, but the truth is some realtors won't even consider them, and those who do, do not really take their responsibilities as landlords seriously. I believe that all people should be covered against discrimination in fair housing regardless of color, religion, sexual orientation or disability I feel as if the disabled community doesn't get fair treatment. They can't find affordable housing, if they do the housing still isn't fully accessible or the landlord/apartment manager doesn't abide by the fair housing law fully and no one is there to enforce it. So they might get a smack on the wrist. I think there are too many protected classes already. Also, enforcing the regulations are almost impossible unless the landlord is relatively stupid. Immigrants/refugees Income levels (i.e., people on SSI or SS), lgbt, status as a student, seniors Lesbian, Gay, Bi-Sexual, and Transgender Community Let me think about that LGBT LGBT, Immigrants Low income families low income households Martial status, Sexual Orientation Maybe not protected but gentrification needs to be put under control mentally ill/ HIV/AIDS Minorities , same sexual couples, disabled and seniors. minorities-hispanic n/a NOW THAT IT'S LEGAL TO MARRY SAME SEX COUPLES, I'M SURE THEY WILL WANT TO BE ON THE LIST. People with Limited English Proficiency People with service pets. Although American Disability Act protects them from questioning, they generally have to pay a lot more to have their pet and still not everywhere will take them due to it being an animal. This really restricts those with emotional disabilities especially because the landlords opinion generally falls under "emotional support dogs are not service animals, you can get medication for emotions" which simply is not fair. Persons discriminated against on basis of sexual orientation/trans status Persons experiencing homelessness; Senior Adults; persons or family units who have filed bankruptcy and been successfully discharged; and and persons who have had a family member charged with a felony and no longer lives with the current family unit Persons who are transgendered Persons with disadvantaged credit and some cases of criminal backgrounds Probably sexual orientation or gender identification. religion

Religion
 Review list in response #4
 same sex couples
 see above
 seniors
 seniors do not have access to affordable housing; as such more housing law should encourage the development of more affordable housing for seniors and low-income persons.
 Sexual identity and orientation, Marital Status, Source of Income
 sexual orientation
 Sexual orientation
 Sexual orientation Gender identify
 sexual orientation (gay & lesbian)
 sexual orientation and gender identity
 Sexual Orientation and Gender Identity
 Sexual orientation and marital status
 Sexual Orientation should be included as a protected class. That said, the state should NOT automatically include/identity formerly homeless persons or veterans in the "disabled" or "special needs" category. This can be demoralizing for said populations, and flies in the face of the spirit of the "Olmstead" settlement.
 Sexual Orientation should be included. Conversely, homelessness, veteran status, and disability should NOT be lumped together in the "disabled" category.
 Sexual Orientation, Education, Age
 Sexual Orientation, gender identity, marital status, source of income
 Sexual orientation, Gender, Source of Income
 Sexual preference/orientation
 Sexuality, Gender
 single parents elderly
 Single parents specially single mothers
 Some are slightly vague- and may not be readily identified.
 SSI recipients
 students
 The non-religious, sexual orientation and gender, LGBTQ.
 Those suffering from Domestic Violence
 those with old criminal history or misdemeanors
 trans gender
 Transgender Undocumented
 transgender persons, gay/lesbians
 transgender,
 very low and extremely low income persons who receive SSI - Supplemental Security Income through Social Security.
 Veterans- Housing not just employment!!!!!!

LOCAL FAIR HOUSING

Table B.5
Are there any specific geographic areas that have fair housing problems?

The State of Georgia
 2015 Fair Housing Survey Data

Comments:

I imagine most places have some bad apples, but predominately white suburban counties have landlords and realtors that ignore the laws regularly.
 All
 All counties
 All over
 Atlanta
 Atlanta and other urban areas.
 Attended a presentation that shows problems in rural areas and coastal Georgia
 BAINBRIDGE, DECATUR COUNTY
 Both staffing and the operating budget need to be increased.
 Buford, GA. Houston, GA. Harlem, GA
 Columbia County, GA it's ridiculous. The county is changing the subdivision regs to prevent middle income families from moving in to the county. Harlem, GA fighting against tax credit development because the residents don't want "those people." It's 77% white.
 Effingham County
 Generally speaking the entire state has fair housing issues and the state office that handles fair housing is nothing more than a facade. Our Fair Housing Council has in the past failed to act on any complaints we sent, so we go to the Justice Department or engage our own attorneys. We have complaints from many surrounding counties for housing discrimination in subsidized and unsubsidized housing in rural and urban communities in this state.
 gwinnett school and neighborhood segregation
 I know this to be the case in Chatham County.
 I only see the rural areas and the high cost of housing. Affordable, safe housing that meets rental assistance guidelines is difficult to

locate.

I would think the metro areas have more fair housing problems than the rural areas of Georgia.

In metro there are plenty of issues, but there are even more difficulties with sufficient stock of accessible housing out in rural counties.

In most of the state, housing areas are mostly segregated ethnically. It is difficult to know how much is self-segregation by choice, and how much is because of lack of options.

In rural counties, Walton county for example, I know of private landlords that have discriminated based on race.

It seems to vary throughout the State based on the involvement of the local government and/or non-profit housing organizations.

lack of accessible housing

Lack of government assisted housing.

Liberty, Long Counties and Tattnal county

Likely widespread- rural, urban and suburban

Metro Atlanta Fair Housing law suite against banks for allowing foreclosed properties to be unkempt in neighborhoods of color whereas such properties were fairly maintained in white neighborhoods.

metro, Thomasville, Albany.

North Atlanta. As a result of gentrification, some apartments are screening out families who receive subsidized housing awards/vouchers. i

North East Counties

Northwest Georgia -- Dalton, GA

Northwest Georgia -- discrimination according to race and sexual orientation

Not sure if the State of Georgia has governance guidelines to commission and have a mandatory FHAP for the balance of state.

The lack of commission to support fair housing intake and investigation establishes an impediment to fair housing act here in Georgia

Probably Valdosta

Rapidly gentrifying urban areas & college towns like Athens where luxury student housing is displacing affordable working class housing

Region 10 like of accurate and affordable housing available in this area. Consumers not understanding Landlord/Tenants rights.

Rural areas

Rural areas are ignored, and urban areas are overwhelmed with need.

Rural areas in NWGA

rural areas. high density poverty areas.

Rural communities

Rural GA

Rural, poor communities throughout the state having enough adequate/standard housing stock regardless of the rental cost.

Savannah, Chatham County

Savannah. Realtors refuse to even consider any person with past criminal charges, in recovery or suffering from mental health issues. The landlords who do treat them as 10th class citizens and do not really pay attention to issues with the properties unless repeatedly called or threatened with taking the issue to higher authorities

seems to be problematic across the state

Southeast

Southwest GA....Seems that ALL influence is located in "Atlanta" and bigger areas of state when South GA not given fair chance!

southwest Georgia

Southwest Georgia

Statewide

Sure, and part of the state excluding Atlanta.. funding in an around metro Atlanta, is not nearly as difficult as other parts of the state.. HUD and DCA taske care of Atlanta.. that is where the votes and politicians are.

The recent Fair Market Rental rates for this area are a JOKE.

the rural areas! the areas outside of Atlanta and Chatham county.

The State as a whole has a problem

There are vast unserved and under-served areas which have little or no access to any fair housing resource. Only two comprehensive fair housing organizations operate in 159 counties in Georgia.

There is not enough affordable housing in the Dalton Area

This is a large state and most infrature to improve fair housing is in large Metropolitan locations

Wealthy, white areas

Yes, rural areas

Table B.6
Please share any additional comments.

The State of Georgia
 2015 Fair Housing Survey Data

Comments:

All housing should be available to everyone with no exceptions.

ANY ONE WHO IS ELIGIBLE TO RECIEVE ANY KIND OF HELP. THIS IS THE FIRST TIME I HAVE BEEN ELIGIBLE IS MY WHOLE 52YRS OF LIFE, AND IT WAS NOT A GOOD EXPERIENCE WITH THE MORTGAGE COMPANIES, BANKS MADE ME FEEL LIKE I WAS BEING A BOTHER TO ASK ABOUT GA DREAM... ONE MORTGAGE COMPANY DRAGGED ME AROUND ABOUT A MONTH BEFORE I HAD TO LET THEM GO. I WAS BUYING A 90,000.00 HOME AND MY CLOSING ESTIMATE WAS \$6552.12 + MY \$1000.00 WHICH BTW I DID NOT MIND PAYING AT ALL... TOTAL (7552.12) NOW YOU DO THE MATH WAS THAT FAIR HOUSING? ... I DID NOT HAVE A GOOD EXPERIENCE AT ALL. FINALLY DECIDED TO NOT DO GA DREAM AND EVERYONES ATTITUDE AUTOMATICALLY CHANGED. IT WAS VERY DISCOURAGING. THANK YOU FOR LETTING ME SAY MY PEACE, AND THANK YOU FOR OFFERING THESE TYPES OF LOANS, BUT JUST KNOW THE BANKING INDUSTRY DOES NOT LIKE THEM AT ALL, I FEEL THEY SHOULD BE REGULATED AND NOT BE SO CONDESENDING TO OTHER HUMAN BEINGS TRYING TO DO THEIR BEST. SAD. I BELIEVE YOU NEED TO SEND OUT SECRET SHOPPERS TO LOCAL BANKS AND MORTGAGE COMPANIES, AND FIND OUT WHAT IS REALLY BEING CHARGED FOR SERVICES GRANT RECIPIANTS. ITS A SHAME, I'M SURE OTHERS FEEL LIKE I DO, I AM GRATEFUL FOR YOUR ASSISTANCE, AND WOULD LOVE TO BE YOUR SECRET SHOPPER. IM GRATEFUL, BUT VERY DISAPPOINTMENT IN THE BANKING INDUSTRY. HOW DO WE DEFEND OURSELF FROM PREDATORS LIKE THIS WE DON'T KNOW WHAT THE AVERAGE FEES SHOULD BE... MAYBE WHEN APPLYING FOR ONE OF THESE GRANTS A CHEAT SHEET SHOULD BE GIVEN TO THE HOME BUYER, SO THEY KNOW THEY ARE NOT BEING RIPPED OFF. I HAVE MY ITEMIZED LIST IF YOU WOULD LIKE TO SEE IT I WOULD GLADLY SEND IT TO YOU. I NEVER RECIEVED A GFE I CAN GO ON AND ON, SORRY ITS JUST SAD, HOW IT WORKS.

As a single female, I was able to successfully buy my own home at a competitive interest rate. My only problem was that there were few options in the size of house I wanted unless I wanted to buy a house more than 50 years old.

Augusta city and county leadership (mayor, council) are not very supportive nor are they active in the lack of safe, affordable housing for homeless, disabled individuals

DCA needs to be working on larger housing subsidies for very poor people, enforce basic access and restore funding for home modifications

Fair housing education is definitely much needed. I run a housing program and am not educated on the specifics asked here. I know protected classes and rough ideas of what you can tell someone about an area without leading, but I would like to know more of the ins and outs.

Fair housing efforts should focus on enforcement against severe violations, and requirements for routine operations conducted in good faith should be relaxed.

Fair housing laws are great but property managers find other creative ways to exclude persons from housing. Property managers should have to participate in Fair Housing trainings

From the Lessor's perspective, it'd be VERY helpful if your offices were more centralized. We have 5 section 8 houses and one of them is outside the purview of the other four, and getting a response from the one is like pulling hen's teeth. Sometimes getting a response from the four is not easy. It'd also be VERY nice if all five payments were centralized. It would also be helpful if you provided an overview of how DCA works and what it does for the property managers. Thank you.

Georgia is a large state- and as most people know the one that cries the loudest and longest will get assistance their community first- too many plans are for the metro areas- where the most people live- but the rural homeless or those needing assistance move to a more populated metro to have more service available

I admit to not being prepared for this process. I would have taken more time had I had a written assessment to fill out.

I am a little bit familiar with the Fair Housing Act since I did at one time have my Real Estate License.

I am homeless and do not understand any of this. I completed the survey because I was asked. The homeless need more assistance.

I have been treated so wrong to now June 30,2015 me and my kids might not have anywhere to stay cause my casework of Waycross Ga. didn't send my paper work in time for me to move in on July 1, 2015. I have losy my job cause i had everything transfer to Houston Co. because my case work sent a letter to me telling me i got to be out on June 30,2015. So now she told me today that i will not have anywhere to stay. I have two kids, 5 and 18 years old. We might have to sleep in my car for a night cause I have no where to stay or I have no job, cause i got to start July 1, 2015, but i have nowhere to move. I hate to have to tell my kids I have lost my job and we have no where to stay, that hurts so bad. If anyone can help me please call me at 229-575-6181, i really need help.

I have only been in my position for a little over a year.

I think it crazy how people have to have so much to get a house.

I work in SC as well as GA. I receive considerably more information about fair housing training from the State of SC and nonprofits working there than I do from any agency in Georgia.

I would love to more educated on the laws of the Fair Housing Act. Hopefully there will be some webinars in the future. Thank you.

If anything I feel we are so focused on Fair Housing that is difficult to enforce the "voucher" regulations.

In sum, from my perspective, lack of affordable supply is the largest impediment to housing choice. Avenues to build in underserved areas need to be developed as well.

It is a badly kept secret that Savannah has Fair Housing issues. Poverty and lack of nonprofit Community Development Corporations means there is little advocacy on critical housing issues (few are making noise and making the public uncomfortable enough to push for needed change). This includes; 1. holding landlords accountable for non-discrimination and maintaining their property (s), 2. holding the local Housing Authority to a client service standard instead of allowing an enforcement first approach, 3. educating tenants on their rights and giving them real options (going to a shelter is often the only option) if they exercise them and 4. addressing the eviction rate in the community as this is reflective of housing policy city/county wide.

It needs to be more available besides online, and it needs to be regulated a lot more in the rural areas. When it's in Chatham

county/Atlanta the problems are dealt with a lot faster. But when we look at the rural areas we work with, their problems and violations are just pushed aside and we are told sorry there is nothing we can do. When what it really sounds like is that they just don't want to be bothered with rural areas.

LUMPKIN IS A COLLEGE COMMUNITY WITH HOUSING GEARED MAINLY FOR STUDENTS - VERY FEW LOW INCOME HOUSING UNITS AVAILABLE

More information for homeless households that need fair housing options.

More outreach and education is need on both sides of housing and for owners it should be required ongoing training. Not enough general public know this information and PSA other marketing is needed

Most of the fair housing rules are examples of inverse condemnation and should not apply to private property.

N/A

Need more public info out there for people to read.

None

None.

Not enough is being done to educate people about what Fair Housing is and what it protects. Too often it's being seen as a negative tool that only works to harm affluent communities. If more education was being done about what Fair Housing is then the negative stigma that surrounds the law would begin to disappear.

Not my area of expertise. In Fayette County, I've not heard of any fair housing problems.

Our municipality has a mixture of races, ethnic backgrounds, types of housing, etc. It is a very diverse community and people from all backgrounds get along well. Ordinances are passed at times, in order to upgrade the condition in which some people live. This is a good community.

PLEASE USE THIS SURVEY RATHER THAN THE ONE I FIRST SENT. I DID NOT INDICATE DALTON IN THE FIRST SURVEY. THANK YOU!

Rental assistance being counted as income has reduced the amount of SSI for people that I serve. This locks them into not having the same benefits as others in the same home or permanent dependence on the programs.

Taking this survey has made me realize that I know very little about fair housing practices in Georgia.

Thank you for the opportunity to provide input.

that should be a hotline for fair housing in Georgia

The State should develop a plan to provide sufficient resources to under-resourced fair housing organizations to provide training and testing. Contracts should require CDBG, ESG, HOME sub-recipients DEMONSTRATE that they are affirmatively furthering fair housing.

the Stephens-Day homestead exemption should be made available throughout GA. Also the state needs to allow local municipalities more control over property tax mechanisms to accommodate affordable housing & stave off gentrification

The webinar was full prior to the call start time, therefore the online screens could not be viewed. Please send the materials via email to view. Presenters were reading from a script, not very engaging. Thank you.

This is a victimization trolling expedition. Poverty is NOT caused by society. The vast majority of it is self induced. Try repealing free trade and bring high paying manufacturing jobs BACK to the US.

Unfortunately, I haven't had the opportunity to run into any problems as trying to live on disability independently is not an option. I can't find anything in the metropolitan Atlanta area that I can afford on my own. I'm forced to rent a bedroom in an apartment already rented by someone else. I don't see how anyone on disability lives independently in Atlanta.

Valdosta has one of the BEST set of policies and practices in working with the disability community. Also, Georgia Municipal Association has worked to help educate elected officials through training at its conferences and technical assistance to cities.

What is wrong with you people? It always starts and finishes with ZONING. Once a property is built no one I know would turn away a paying renter, but before hand, because the program is called, "Low Income Housing Tax Credit" the image people get is busing poor black people in from downtown Atlanta/Athens/Augusta/Savannah/Valdosta/Rome/etc. Change the name of the program!

While I feel confident that there are shortcomings throughout the Savannah area, I do not have any direct personal interactions or proof.

FAIR HOUSING IN THE PRIVATE SECTOR

Table B.7

Are you aware of any questionable practices or barriers to fair housing choice in the rental housing market?

The State of Georgia
2015 Fair Housing Survey Data

Comments:

lack of education re fair housing and housing discrimination; inadequate public transportation; underserved populations; NIMBYism; apartment complexes refusing to work with housing subsidy programs

a lot of applications must be done on line. a lot of people don't have easy access to computers.

Affordability in private market

Affordability of quality housing.

Affordable rental housing has been segregated to distressed neighborhoods; landlords are taking advantage of persons by not making repairs as needed forcing renters to remain in substandard housing; rental housing cost has surpassed the house note costs direct to the renter.

Asking a disabled person to pay for pet deposits for service animals, Or refusing or making process very difficult to apply for a rental; over pricing the unit.

background checks for credit, criminal activity in the past

BASED ON THE COLOR OF YOUR SKIN YOU PAY A HIGHER RENT ONE INSTANCE WHEN THE OWNER DISCOVER THAT THE PERSON SHE WAS TALKING WITH FOR A WEEK WAS BLACK SHE TOLD HER THE HOUSE WAS NO LONGER

AVAILABLE. THIS WAS AFTER THEY HAD AGREED TO MEET THE FOLLOWING DAY TO SIGN THE LEASE AND PAY THE DOWN PAYMENT.

Because of physical accessibility barriers people who use wheelchairs have not been able to rent housing
Communities often protest the development of affordable rental housing based on perceptions about the tenants.

Credit report. I believe that a person's credit should not be the determining factor.

Criminal backgrounds

Education is the barrier. Those who are being discriminated against are unaware of their rights and so they cannot blow the whistle on perpetrators when discrimination happens.

Extremely high for low income person

Failure to reasonably accommodate or permit reasonable modifications for persons with disabilities; refusal to rent or imposing different terms & conditions for families with children (limiting a two-bedroom rental to one child per bedroom); sexual harassment of female tenants

Family size Savannah's Crime Free Housing Ordinance Inadequate housing inspections (tenants living in deplorable conditions and afraid to report at City will evict due to the state of unit)

financial ability, poor credit

For people with disabilities, architectural barriers combined with low income are significant barriers. Some tax credit properties need to be for very low income - 10 - 15% AMI as opposed to 50 to 80%. State needs to invest in vouchers for all disability groups, not just those with mental illness.

For persons who are transgendered

Having more than 4 individuals in a household Having a male between 12 and 18 in the household victims of domestic violence

Higher rent rates to discourage minorities from being able to rent homes.

houses are not made physically accessible.

Huge barrier for persons with disabilities: lack of accessible units on public transit lines

I have heard from renters, and once from a landlord, of people not getting a place to rent due to their skin color.

I have overheard people mistreated and did not know they had rights- I always encourage the person to report the case to end discrimination practices

I have seen a landlord deny someone a housing application based on race.

I know someone who experienced racial discrimination by a landlord

I know that race discrimination happens but landlords are very savvy about their application process in order to avoid violation detection

I think it is more subtle than a flat refusal to rent, it is not returning phone calls if a person "sounds" black, not considering applications from a family with an "ethnic looking" name, not having rental agreements in spanish, etc.

I think that many landlords don't rent to people based upon their race. I also believe that GA landlord tenant law makes it difficult for low-income people and persons with disabilities to effectively assert their rights in court.

I think they are steered to other locations or will not be considered first

I've heard stories of landlords offering what sound like weak reasons to refuse to rent but these are hearsay.

In our community, most rental housing is by private individuals who can easily discriminate without much chance of adverse consequences.

In the City of Hinesville, JCVision and Associates, Inc. has filed complaints with HUD and race was the reason for the refusal by the housing provider to decline housing to the consumer. The household was a multi-race household.

In the rental market the majority of units are substandard, with some not even fit for living conditions. Landlords do very little to correct issues.

Insufficient rental units for people of low to moderate income, people with disability,

It would mean just putting particular group of people in the same location based on their color or religion.

Knowledge of refusal of rental properties to make housing available to those with receiving disability benefits and/or of hispanic origin.

lack of affordable, accessible and integrated multi-family housing for people with disabilities who live on SSI income, about \$640 a month.

Lack of availability of affordable safe housing lack of regulatory bodies for safe and stable housing

Lack of knowledge of the fair housing laws

Likely not intentional but there is a lack of affordable wheelchair accessible rental housing

Many landlords and developers do not accept Section 8 vouchers; tax credit properties are not readily available in majority white areas, such as north Atlanta and counties outside of DeKalb and Fulton, thereby restricting people's access to good jobs.

Many times a landlord will decline to rent to someone who has an obvious mental illness or is a convicted felon. regardless of the charge.

Many times households with limited English skills are either told there is not anything available, the landlords managed to find a reason to evict them soon after they have moved in, raise the rent and there is a direct correlation to the number of children in a household and a seemingly inability to be able to stay in one location for any length of time.

minimum income requirements for consideration of housing, private homeowners/landlords who do not believe fair housing applies to them, local jurisdictions that refuse housing for special need housing, specifically individuals with developmental disabilities in single family homes

most landlords do not allow pets so they try to deny someone with a service dog or they try to make them pay an outrage fee for having the service animal.

Most rental housing are visibly segregated, by race and national origins.

NIMBY on tax credits in rural Georgia.

not accessible for mobility impaired person

not many disability accessible units

Of course, there are. A rental agent can easily control this if he or she chooses to act unethically.

owner's opinion of neighborhood composition

People are being steer away from certain area and towards others.

People in recovery, people with any type of criminal background and people with mental health issues

People still have their own prejudices, sometimes unknown to them.

People told by landlords that they don't rent to people with disabilities or who are on government subsidies

Persons who are transgender
 Physical Impairments Transgender
 Race
 Race, disabilities
 Refusal to rent based on color and military status
 refusing based on previous rental experience, refusing to rent based on inability to pay full deposit, set-up or connection fees,
 refusal to rent based on criminal history
 refusing to rent an upstairs unit which was the only one available to families with children
 Refusing to rent based on race
 Refusing to rent to people of with mixed children
 Religion and race protected class
 Sections of housing is referred to as: black section, Hispanic section, or white section. Renters are warned that they may not fit in in certain areas because of noise and activities of certain racial or ethnic groups. Complaints are often made against black or Hispanic children of certain age ranges: 13 to 18 are common. Landlords are also reluctant to make accommodations to properties for handicap accessibility. They often have not concept of how to handle the requests or evict someone who needs assistance.
 Single family construction is not covered. And, aggressive enforcement.
 Singles Mothers who get child support, but cannot work due to the ages of the children.
 Some discrimination for those with mental illness
 steering, indicating that a property is not available, when in fact, it is, discriminatory advertising, refusal to respond to interested callers on the basis of how their voices sound on the telephone
 Substandard housing in the rental market - some from the late 1800's that is in desperate need of repair - but with no other alternative people accept it or move on to other/larger communities.
 Supply of affordable rental housing.
 The housing markets in LaGrange, GA/ seems to be operated on the basis of color and age by private absentee landlords. Landlords are not held accountable for the upkeep and safety of their properties. The properties are dilapidated, insufficient utilities, and a host of other problematic conditions. The costs of these run-down properties are outrageous and the maintenance is far from adequate. There does not seem to be an recourse when a tenant's rights and the habitability of these new and/or old propertie are not addressed. There seems to be a great difference in "private property" owner's responsibility to decent housing.
 There are not enough housing for people living on or below the poverty level.
 There aren't enough handicap accessible rentals. The waiting lists for those units are too long.
 There is a different price price quoted for rental properties for African American v Whites in Bainbridge. Additionally, some landlords when they discover your race they will refuse to rent to you. this has happened to me.
 There were issues in my neighborhood. Residents making an issue of regulations that don't exist.
 Too many people in the family.
 Uneducated landlords avoiding certain protected classes
 Victims of DV or people with no work history

Table B.8

Are you aware of any questionable practices or barriers to fair housing choice in the real estate industry?

The State of Georgia
 2015 Fair Housing Survey Data

Comments:

can not refuse due to family
 depends on your socioeconomic status
 Discrepancy in rental rates
 Education is the barrier. Those who are being discriminated against are unaware of their rights and so they cannot blow the whistle on perpetrators when discrimination happens.
 Failing to show homes to individuals of certain racial or ethnic backgrounds or of certain sexual orientations
 Families often steered away from communities or not shown houses in certain areas because they are a different color from the predominant demographic. Again, subtle.
 Geographical impediments- districts keep changing to appease certain groups by squeezing others out. The most obvious is in the city where the train tracks almost perfectly divide the nicer area from the poorer
 Georgia Dream Program has been designed to discourage applicants and developers from participating. Applicant process to cumbersome and disorganized. Housing is developed into communities that exclude certain persons by design.
 Have experienced this in the Fulton County area.
 I do know agents are call by current residents about who is moving next door
 I have heard of realtors taking people to other counties
 I know of many, many instances in which Realtors neglect the needs/desires of their clients in only showing properties that they have a stake in or only show properties beyond the clients' stated budget and neglect clients with lower budgets. Also, too many Realtors are also investor/landlords who snap up affordable properties before they are fully listed and eliminate the possibility of homeownership of such properties.
 I suspect some agents steer without realizing they may be in violation of the persons rights.
 In the City Hinesville, JCVision and Associates, Inc has file a complaint claiming familial status; the family was refused an available rental housing unit due to having "too many" children. The family size was 8 in the household and the income was sufficient to rent the unit.
 Increase awareness
 lack of affordable housing supply to meet the needs of low-income population
 lack of affordable, accessible and integrated single-family housing served by public transportation for families who have members with disabilities and who live on very-low incomes
 More so with low income

most people don't know were to look
 My community remains very segregated in terms of housing. I think rental agents are aware of this and steer consumers accordingly.
 Not openly but it is certainly perceived as existing in parts of Walker County.
 Only people with low income or children are able to get better housing.
 Only providing limited information to minorities, and not advising individuals about options when credit scores are low.
 People are being told that only a certain amount of children are allowed in apartments of certain sizes.
 Phrased in a way that says neighbors and other tenants complain about the noise and disruption caused by a large number of children.
 Properties are said to be no longer available
 Realtor companies would not even consider people in recovery, people with any type of criminal background and people with mental health issues. Those who do treat them and 10th (second does not apply) class citizens
 Realtors' biases and opinions affect their showings, recommendations, etc.
 Red Lining
 Refusing to show houses in a certain area based on the way someone looks
 Same responses as for question #1;
 saying they do not want to rent to people with disabilities
 Single family construction is not covered. And, aggressive enforcement.
 Steering based on race, families w/ children and disability
 There have been multiple reports of steering residents to certain neighborhoods depending on their demographic profile throughout the Metro-Atlanta area.
 There seems to be antidotal evidence to support the discrimination of minorities in this category because there are large neighborhoods which are dominated by certain ethnic and racial groups.
 They steer.
 This is similar to the question above. People should be free to live where they want and not where the real estate agent wants him to live. This is called steering.
 unscrupulous realtors
 when I worked in mortgage lending I was surprised some realtors steered the client to certain areas
 Where it is dictated by the property - Over 55 community

Table B.9
Are you aware of any questionable practices or barriers to fair housing choice in the mortgage and home lending industry?

The State of Georgia
 2015 Fair Housing Survey Data

Comments:

aggressive enforcement.
 All top 5 banks have prey on minorities and the racial minority for over 3 decades. Every major bank and Gov't Divisions in the US have pending lawsuits regarding barriers placed on housing
 Among subprime borrowers with similar credit ratings, blacks and Hispanics are 30 percent more likely than whites to be charged the highest interest rate. There are incentives lending agencies give to mortgage brokers, saying the incentives reward brokers for steering customers to the most expensive loans. So Unfair
 As stated in the question! Discrimination still exists
 banks have closed many offices in minority neighborhoods, making it harder for minorities to apply for loans.
 Because women still earn less than men.
 Both groups are financially challenges and are therefore de facto discrimintated against by credit agencies.
 Common practice, told have too little credit or raised interest due to being labeled high risk
 fair credit
 FEMALE CLIENT WITH GOOD WORK HISTORY GIVEN INTEREST RATES HIGHER THAN MARKET RATES ADVERTISED
 From the information provided by a recent fair housing seminar showed that women and minorities received fewer loans but at higher interest rates.
 Happens all the times to minorities.
 higher rates for those with "risky" backgrounds
 HMDA, ECOA, CRA
 I have heard of this.
 I Want to believe this is not the situation but I am not certain so I say don't know
 I would not however as an advocate I have seen closing documents that clearly the raised the rate to be paid more commission- this is not prevalent now But I am sure if lenders could they would still engage in this activity
 Ignorance
 Increase awareness of the laws and the penalties
 It's very hard for underserved groups to gain access to financing.
 JCVision and Associates, Inc. filed a complaint for a homeowner looking to refinance the mortgage and receive a modification under the HAMP or HARP program. The homeowner is African American and refused a modification although he met the federal program requirements.
 Lenders employees send minority potential customers to subprime lenders rather than explain how they can improve their credit like the advice they provide to white clients.
 Low income families are challenged to qualify for a mortgage
 Making obtaining mortgages almost unattainable for women and racial minorities
 MAYBE WHEN THEY ARE INFORMED IT IS COMING FROM A GRANT. I WOULD LIKE TO KNOW WHAT REASONABLE RATES ARE FOR MORTGAGE FEES WHEN PURCHASING A HOME.THEN THE HOME BUYER COULD HAVE A GAGE.
 Minorities are continuously offered lesser rates and loan packages.

mortgage industry is using credit scores to deny mortgages.
 no accountability to large banks and financial institutions. Constant bailouts for corporations.
 Offering higher interest rates to minorities. I know this is the example, but it is true.
 Offering smaller loans to minorities Denying loans to people of color
 Once the property owner sees a person of color, the addresses of available properties changes and/or the price goes up.
 Predatory lending practices that targeted racial minorities. I know it's been exposed for years but suspect it is still going on.
 Refusing to give 100% information to a potential client based on appearance and not qualifications
 Same as above
 Saw quite a bit of that when the housing market was just starting to burst. You do not see it quite as much in this day and time but seem to see more denials to those groups which sort of amounts to the same thing.
 Since providing services to my clients, I have notices a bait and switch in the deeds. As an example on one clients paperwork she had two different interest rates on her document. One amount on the TIL and another on the HUD-1. This is not the first time. I have seen this. Many home purchasers in south GA are being taken advantage of because lack of education and training about home buyer training.
 slow credit, no credit barriers
 Steering minority borrowers to high-interest loan products. African-Americans borrowers are 3X as likely to receive high-interest product. (See NATIONAL COMMUNITY REINVESTMENT COALITION STUDY, 2003)
 The banks have tightened credit and are looking for the lowest risk and shutting out many after the previous bank crisis.
 The practice of offering exorbitantly higher mortgage rates to lower income people is unfair & only increases housing costs for those who can afford it less.
 There is a large group of persons that lost their homes to foreclosure during the housing crash who will never be able to return to home ownership. There is a steep variance in the interest rates for different socioeconomic groups.
 There is little help available to those with health issues who are still able to work...ie people undergoing cancer treatment who miss work as a result, but have not been terminated because of the illness
 This happened to me personally. When buying my first home, as a white female, the mortgage company spoke with me about my interest rate. Later that day they called my fiance and spoke with him about what his would be. Now be mindful, we started building credit at the same time, had the same history, identical debt ratio, and I made more money than he but my rate was far higher and there was no explanation offered up as to why.
 This is discrimination against women or racial minorities making it difficult for them to afford the home due to high interest rates.
 This is illegal and they should know they will be reported and shopped for discrimination
 This question is impossible to answer without being provided HMDA data to analyze.
 Women and more specifically single mother with children

Table B.10

Are you aware of any questionable practices or barriers to fair housing choice in the housing construction or accessible housing design fields?

The State of Georgia
 2015 Fair Housing Survey Data

Comments:
<p>accessibility is a real issue in our community be/c of historic preservation so rehabilitating is likely where this is more important ADA Again. Finding housing for those with physical limitations is very difficult. As stated in the question. Homes in general are NOT designed to be visitable much less inhabitable by people who need accessibility Available units and visitability throughout the property builders not providing basic access and step-free entrances with a bedroom and bathroom on the main floor accessible to a wheelchair user. Building design without attention to accessibility by physically disabled Discrimination comes in the form of not making enough units physically accessible. they may meet the law, but there are not enough units for current, let alone growing, demand. Further, many such units are placed in unsafe places in the community, Doorways surely are followed however- people with large families have a difficult time finding housing large enough for 6 or more people Ensure that industry professionals are aware of the need and provide incentives to making this adjustment. example used above, as well as, number of units available to LI in new housing Failure of local planning and zoning to redone at a higher density to make tax credit applications favorable. failure to comply with design construction requirements of the FHAA Failure to design & construct according to FHAA in both rental and sales (i.e., condominiums) Federal courts tend to allow violations en mass when no one sues...Single family construction is not covered. And, aggressive enforcement. Geared to specific populations Homes and apartments designed for student tenants or single tenants (homes, condos, apartments that rent out single rooms). Homes not allowing handicap access or parking Housing design and location has been very limited by zoning and code. Multi level rental complexes lack access to higher levels limiting choice for many renters. Lower level apartment units are at a higher rent. Entrances and exists of housing are most often inaccessible to persons with handicaps. However most construction created in the past 10yrs do not require builder to create wheelchair accessibility or unit for individuals who have disabilities. I find that the first floor apartments that should be for individuals with disabilities still have a little lift to get into the door or the flooring is a thick carpet, bathroom isn't big enough for a wheelchair/walker to get through, etc. Or you go to the complex pool and there are steps with no ramp to the pool, there is a ladder but no steps leading into the pool gradually or a chair lift to help people to get in and out of the pool, the rent office isn't accessible for wheelchair/walker users, etc. So the design on the outside might look</p>

good but once you get into the apartment and actually look at the complex amenities they are not accessible.
 I have been in many of these places, especially in low income areas.
 I have inspected properties in GA that do not meet the requirements of the FHAA of 1988.
 I think all housing should be wheelchair accessible if you don't need it now you may later
 In many areas we are still stuck in the thought process of give me the most bang for the least money so that I can recoup my costs in the shortest time possible - I just want to rent the place and if they can't access everything they can just go look elsewhere. I believe this is more prevalent in small rural communities than in the large population areas
 Insufficient amount of small but quality single family homes available in diverse areas. Currently in northwest Georgia, small new homes are only being built in areas that are already overwhelmingly Hispanic. In other areas, larger more expensive homes are built. Why is this?
 It is difficult and very challenging for a disabled body person to find comfortable housing that can accommodate their motor chair or wheel chair.
 just very few disability accessible units available
 lack of affordable, accessible and integrated multi-family housing, lack of universal design in both single-family and multi-family housing, lack of flexible structures that allow interiors to be re-arranged based on the needs of occupants, lack of use of low-cost, high-efficiency building materials, lack of coordination and planning between public transportation providers and housing construction contractors. Most single-family housing construction companies should be required by law to build in basic accessibility, i.e. visit-ability. Every new home visit-able for people with disabilities. Integration begins in the neighborhood!
 Lack of physical accessibility and accommodations
 Likely not intentional but there is a lack of affordable wheelchair accessible rental housing
 Many apartment complexes are building new & preexisting constructions with limited or narrow doorways & hallways.
 Most multi-family complexes are built for a totally homogeneous population and eliminate possibilities for diverse community building
 Most of the newer housing I have seen do not have wide enough doors. Including the front door.
 New homes are all not being built disabled access.
 New housing construction is designed and marketed to students
 New rental complexes not having enough accessible units. Having a wide doorway does not make a unit accessible. Not complying with the required number of accessible features like roll-in showers or accessible common areas.
 no sufficient or affordable housing
 not all houses/buildings are designed with HC access in mind.
 Older housing is often not suitable for accessibility needs.
 Personal and cheaper costs.
 Resistance of builders to adopt universal design principles and build homes that facilitate the option of aging in place.
 Single site PSH facilities are part of the ANSWER to Olmstead; not the enemy!!
 Some units have very limited accessibility
 The private builders are allowed to construct without the same adherence to policy as public builders
 There is a lack of accessibility for those who need accommodations.
 This is a big issue. Newer rental complexes without elevators, narrow doorways in homes, stairs without railings, etc.
 This would be a building code violation because handicap accessible units are required based on total number of units.
 Those in the construction business still seem to be unaware or unwilling to build in accordance with all laws regarding accessibility.
 Townhouses are not required to have any access features. The market rate building industry is constructing hundreds of these now.
 DCA should not allow these properties to be part of any tax credit program since our state is facing a huge increase in older people who will at least need one level living and at most, fully accessible homes.
 two story, no regard for elders with disabilities

Table B.11
Are you aware of any questionable practices or barriers to fair housing choice in the home insurance industry?

The State of Georgia
 2015 Fair Housing Survey Data

Comments:

a lot of people can't afford insurance
 basing insurance coverage acceptance on how much a home can be re-sold for...
 Enforce the rules and assessing a penalty
 example above, as well as, higher insurance for developers in certain areas to discourage development
 I have no idea how my insurance is calculated. At one point, my rate jumped almost 50% and was told it was a state hike. I wasn't sure, but what could I say.
 I must smile on that one
 I think it is more a question of cost and the mortgage holders will find the most expensive policy for you rather than to steer you to an affordable policy.
 I've experienced this type of discrimination myself.
 Insurance cost is much higher in certain zip code areas which have more minorities residing.
 insurance has been denied because of kind of dog in the household and because of credit score.
 Insurance providers bundle services together and are able to increase rates based on age or not using all the services in the bundle. Elderly paying more for car insurance or not having car insurance but paying more for home insurance because not bundled
 JCVision and Associates, Inc. filed a fair housing complaint for a Hispanic household that had a high cost lost. According to the documents, the insurance provider insured the home for twice the value of the home. Due to the statute of limitation, the homeowner could not seek protection under the act.
 Policies are being sold for current value and not replacement value. The home owners are not being told that there is a difference in the type of policies being sold. They are being sold on the cheapest price. Once the home is paid off they are not advised to maintain homeowner insurance or tax payments for annual taxes, so they are losing their homes to non-payment of taxes or

fires.

Racial discrimination in the provision of insurance not only denies fair housing choice, but also fosters disinvestment and the deterioration of neighborhoods. Discrimination in the provision of homeowners insurance can take many forms. Insurance redlining is the systematic refusal of insurers to issue policies and/or providing inferior terms and conditions on property in certain neighborhoods, based on racial stereotypes or other non-market criteria. Redlining is also demonstrated in higher rates for properties in minority neighborhoods, the relocation of insurance agencies outside of defined areas and the selective placement of agents on the basis of race. Minimum policy requirements and restrictions or penalties on older homes also have a discriminatory impact on older inner city, largely minority neighborhoods.

rates vary from one neighborhood to another
 same as question #4.

Same as the example. That is true!

The cost for in insurance is higher in neighborhoods with higher percentage of blacks. I have three homes in different communities in my City. The home have in the community where there is a higher percentage of blacks and the housing value is three times less than another home where the largest percentage of owners are white. The home in the minority neighborhood in insurance is over 2000 and is valued at 140000. In the other neighborhood my property is valued at over 500000 And the insurance is less than 1300m

using credit scores to determine coverage rates

Table B.12
Are you aware of any questionable practices or barriers to fair housing choice in the home appraisal industry?

The State of Georgia
 2015 Fair Housing Survey Data

Comments:
appraisal people are at least 10 years behind in understanding housing accessibility and universal design in housing features. They don't understand the value of a zero-step entry, wider door-ways, wider halls, at least one bathroom on the main floor and additional blocking behind the bathroom walls. appraisals are lower for homes in majority black areas than for the same home in a majority white area; Areas of town are factured into the value Areas with a high crime or theft rate depreciates the home value in those areas. No one wants to live in those neighborhood. Clustering is the extent to which minority areas adjoin one another spatially. It is maximized when Black neighborhoods form one large, contiguous ghetto; and it is minimized when they are scattered, as in a checkerboard pattern. Centralization is the degree to which Blacks are distributed in and around the center of an urban area, usually defined as the central-business district. Concentration is the relative amount of physical space occupied by Blacks; as segregation increases, Blacks are increasingly confined to smaller, geographically compacted areas of lesser value. Enforce the rules and assessing a penalty Home are being appraised based on location of the neighborhood and who is purchasing home and not the actual value of the home. Homes in South Fulton are appraised at a much lower value than homes in North Fulton. Houses being unvalued for whatever reasons I am guessing but general impression was value went down as minorities moved into my neighborhood. Major issue with housing valuation but not as simple as ethnic composition. More cultural. Most racial minority areas in GA home appraisal much lower than the average housing pricing. In addition, most are under water My experience is that this has been very subjective based on majority population in the community Particularly in rapidly gentrifying areas, home appraisals (& taxes) go up exponentially, even on homes that have not seen improvement. Wealthier new residents who demolish & rebuild or totally rehab & add-on to modest homes in affordable neighborhoods drive up property values for long terms & traditionally lower-income residents who cannot afford the increased taxes & upkeep expectations of their new neighbors. Person's property in ethnic neighborhoods are appraised used figures for another county, based on the size of the house. Red Lining Rundown neighborhoods. Not in my back yard mentality. Same as question #4. This trend tends to occur in older low-income in-town neighborhoods which just happen to have a large number of minorities both in rental and owned property. Zillow list my home far less than my White Neighbors home even though my home is newer, larger and have more upgraded amenities. Marshall and Swift provides a higher cost for my home.

Table B.13
Are you aware of any questionable practices or barriers to fair housing choice in any other housing services?

The State of Georgia
 2015 Fair Housing Survey Data

Comments:
restrictive zoning "Cash for house" illegal signs targeting neighborhoods that are gentrifying, which in Atlanta typically means that homeownership is transferring from black to white owners. Barriers in regards to assistance based rental properties Very few options in regards to housing program and services or funds offered in our area CDBG funding. Profound discrimination. Currently, only "entitlement" cities are guaranteed funding annually. This discriminates

against about 99% of cities in Georgia (and people). All cities should be allocated funding based on population. Code enforcement is lack in apartments occupied by minorities and women. communities need to be aware of those with disabilities when implementing crosswalks and other safety issues that could be altered per the needs of individuals

Condo associations need regulating--a single investor can purchase a majority of properties in a condo complex & have a majority vote on fee increases while also driving down the value of the other properties by selecting unsavory tenants & then coaxing existing homeowners to sell.

Emergency Sheltering and transitional housing lack the financial resources to ensure that their facilities are handicap accessible. Evicting victims of domestic violence if the incident of violence occurred on the property even though person evicted was the victim. HAS use of practices that have a disparate impact

Homes for people with disabilities discriminated against by zoning. Too many people with disabilities concentrated in nursing facilities , institutions, and large personal care homes

I have seen and heard about tenants treating individuals of color badly with race as a factor... And of landlords threatening to evict Muslims.

IF YOU ARE BLACK WHEN YOU ARE BEING EVICTED IN DECATUR COUNTY YOU ARE REQUIRED TO PAY ALL MONEYS BEFORE YOU CAN WRITE A RESPONSE. THIS IS NOT REQUIRED OF WHITE PERSONS BEING EVICTED.

Lack of affordable housing
 Lack of homebuyer training; lack of landlord/tenant training
 Lack of rural zoning or whether there is zoning, local failure to have housing choice through restrictive zoning. It has to stop!
 Likely not intentional but there is a lack of affordable wheelchair accessible rental housing
 Median income. What does this means for a mother of four or five who is forced to leave her home due to family violence. How can this family get over this barrier.
 municipal ordinances establishing minimum square footage of housing, resulting in lack of affordable housing, which predominantly affects the minorities

New immigrant households are often taken advantage of it many areas of housing due to a lack of knowledge of the housing market, the value of the property and a minimal standard to which it should be maintained.

Public housing and local governments continue to build housings that do not promote housing diversity.
 section 8 hud housing

Shelter services are often denied to those who are disabled or who have a medical or mental health issue which requires medication or use of a wheel chair or other devices for limited mobility. Families are also refused service for being unmarried, same sex couples, or transgendered.

Some section 8 housing units are very careful of trying to keep a balance of different people - white/black/Hispanic, old/young, married/single without letting you know what the actual rental costs are. Marion County is a good example of this - I know rates are income based but it seems to be a game to play the system to create the most money for the developer/owner rather than a reasonable dwelling at a reasonable price given a set income.

The Department of Community Affairs talks a good game but doesn't delivery on affordable, accessible and integrated housing. DCA needs to have their cage rattled a bit. they need to be shaken and they need to wake up to the changing demographics and changing needs of aging baby-boomers. People want to age-in-place but DCA is stuck in a paradigm from 20 years ago that tries to meet needs by creating separate but unequal housing for poor people, people with disabilities and the elderly with functional imitations.

The State of Georgia does not have a FHAP that represents the balance of state. Georgia EEOC was the FHAP that represented the balance of state. However, Georgia EEOC is not providing intake of fair housing cases and it appears the State of Georgia is not funding a FHAP to assist the balance of state to support fair housing prevention activities, education and outreach. This is an impediment.

There are no funds available for retrofitting homes in the event that an occupant has an acquired disability AND is low income. Job loss on account of disability is a sure way to enter in to poverty. The elimination of the Home Access program that DCA once had is a significant barrier to such people who want to remain at home. Inaccessible property often causes falls resulting in further injury and EXPENSIVE NURSING FACILITY PLACEMENT. The Home Access funding is desperately needed!!!

this isn't a "barrier" as defined by law but the lack of affordable housing for seniors is almost at a crisis level in our community

We are addressing fair housing itself as a barrier to housing many of our clients who have credit concerns, criminal histories or past evictions. We've been working with the Georgia Commission who has stated that, when our clients go through our program (rapid rehousing, or something similar - apartments can relax some restrictions and not worry about violating fair housing by giving them "preferential treatment". In fact, they would be "affirmatively furthering fair housing" by allowing homeless individuals and families access affordable housing choices.

Where to find low income housing and available units or open waiting list

FAIR HOUSING IN THE PUBLIC SECTOR

Table B.14
Are you aware of any questionable practices or barriers to fair housing choice in land use policies?

The State of Georgia
 2015 Fair Housing Survey Data

Comments:

allowing apartments in areas with high concentration of apartments, but not allowing them in predominantly white areas in gwinnett Athens has many apartment and condominium complexes, but they are not designed or advertised for/to families. The large complexes are geared toward students.

CERTAIN AREAS, DO NOT ALLOW FAMILIES TO PUT MOBILE HOMES ON PROPERTY.

Cities won't rezone if they think affordable housing is going in.

City of Atlanta Supportive Housing Permitting Process is difficult to navigate, has no identified appeal process, and it is unclear

whether or not the ordinance is having the intended affect. (I.e. Restrictions on SH programs within 2000 feet of each other.) City of Valdosta. The city council and its P&Z board discriminate against multifamily developments in certain areas, even though the zoning allows for multi family.

Clustering is the extent to which minority areas adjoin one another spatially. It is maximized when Black neighborhoods form one large, contiguous ghetto; and it is minimized when they are scattered, as in a checkerboard pattern. Centralization is the degree to which Blacks are distributed in and around the center of an urban area, usually defined as the central-business district.

Concentration is the relative amount of physical space occupied by Blacks; as segregation increases, Blacks are increasingly confined to smaller, geographically compacted areas of lesser value.

Decisions to locate low and moderate income units in areas with high concentrations of Caucasians.

Enforce the rules and assessing a penalty

example above as well as cost of land and development requirements

government laws that prohibit houses being closer together

I see multi-family zoned land concentrated in certain areas.

I think land use is often restricted for various reasons. Sometimes the use restrictions do limit multi-family housing, but unless its specifically done to act as a barrier to a protected class, it is not a violation.

I think the affordable housing market concentrates in areas less likely to oppose apartments

If a family owns property, there is a limit to the size of the property to add a mobile homes.

In Harlem, GA we are struggling with a land use plan that only allows higher density, meaning not single family, in a poverty QCT.

Efforts to expand into a middle income QCT were met with vitriol and borderline violence.

In the city on the wrong side of the tracks and out in the county- certain areas

It always starts and finishes with ZONING. Once a property is built no one I know would turn away a paying renter, but before hand, because the program is called, "Low Income Housing Tax Credit" the image people get is busing poor black people in from downtown Atlanta/Athens/Augusta/Savannah/Valdosta/Rome/etc.

Land use policies in this county do not take in account cost, transportation, income, and location for multi-family housing.

Land Use policies will routinely restrict the use or development of certain residential structures (multi-family housing or group homes) to non-residentially zoned areas.

Low income tax credit properties are sited in minority neighborhoods.

lower property values and higher crime rate.

Multi-family housing is restricted and tends to always be set aside from single family dwellings. Zoning is restrictive as evidenced by the segregated types and/or lack of housing. As a society we tend to implode upon others our beliefs of what housing should look like...this limits a communities exploration and acceptance of other types of land use policy.

not allowing apartments in cities

Overly stringent "definition of family" ordinances limiting the # of unrelated residents in a single home in certain areas. Multi-family zoning in traditionally single-family neighborhoods that encourage property owners to sell out to developers. A need for inclusionary zoning to encourage diverse housing opportunities

Policies that concentrate multi-family housing and tax credit funded projects in limited areas.

Quite often communities do not want multi-family housing to be within single-family neighborhoods or close to them either. Because of this, many comprehensive plans can indicate that multi-family is only permitted in a limited area that is not near existing single-family.

Renters with disabilities living in private communities is not welcome

Restrictive codes in wealthier cities that do not require or in some cases even permit multi-family housing or for developments to have a percentage of workforce/affordable housing.

Same as my answer to impediments that local govt and housing authorities do. In addition the state do no monitoring of their housing projects.

some places try to restrict group homes and some neighborhood associations do as well.

Square footage allowed per person is much greater in the unincorporated area of the county which limits density and affects affordability. However these types of policies tend to be addressed on a complaint basis only.

Stigma associated with higher density housing in most suburban communities. Trends toward larger minimum dwelling sizes and gated communities.

STOP building huge nursing homes! No one wants to live in them. They are just dumping grounds for old people.

Tailoring land use to include w/c accessibility.

The difficulty of building affordable housing in high-end areas

There are definite areas that are zoned for multi-family and they are generally in low-income areas.

There are too many of this kind of approach to fair housing. That in itself is a barrier

Think it's discrimination for "political officials" to NOT allow zone change due to the fact that a WHITE neighborhood is with-in walking distance of proposed "development". Politics and Discriminatiion!!!!

This is a controversial issue in Athens that is framed as keeping college students out of family neighborhoods, but has side effects that affect fair housing choice.

This is usually local zoning laws. Most cities that I am aware of tend to congregate their multi-family housing in one or two areas of the city/county.

we need more multi family availability in Dalton

We need More Multi-family housing in our community

Yes, throughout the state in metro and rural areas

Your better staffed zoning offices are better trained and willing to stand for true zoning vs the political expediency of the moment

Zoning that isn't inclusionary

zoning, land requirments

Table B.15
Are you aware of any questionable practices or barriers to fair housing choice in zoning laws?

The State of Georgia
 2015 Fair Housing Survey Data

Comments:
<p>Areas where hoa or others do not want group homes. attempts to revise the local zoning laws in our community got stalled by private industry Cities won't rezone if they think affordable housing is going in. City of Springfield GA recently settled complaint with HUD for denying group home facility. City of Valdosta. The city council and its P&Z board discriminate against multifamily developments in certain areas, even though the zoning allows for multi family. city ordinance Communities block low income housing Don't know if they are policies, but they meet a lot of neighborhood resistance Enforce the rules and assessing a penalty government laws that prohibit houses being closer together Historical areas, homes for elderly and disabled I have been told that it is very difficult to open a group home unless you know the right people in Douglasville. I have heard of the very thing mentioned in the example, difficulty opening a group home for disabled adults in a residential community. I see multi-family zoned land concentrated in certain areas. I will suspect this may not be enforced or recognized ignorance of local elected officials, city attorneys and city planners. In Albany groups homes, CLAs, PCHs. etc. must be a certain distance from one another. In this area there have been many instances where land has been donated to build shelters only to have the residence of the area to fight to keep homeless people out. It always starts and finishes with ZONING. Once a property is built no one I know would turn away a paying renter, but before hand, because the program is called, "Low Income Housing Tax Credit" the image people get is busing poor black people in from downtown Atlanta/Athens/Augusta/Savannah/Valdosta/Rome/etc. It is often stated that the zoning laws have restricted the establishment of group homes in some areas. Lack of higher density zoning diversity, moratorium on additional rental development, more restrictive subdivision standards which raise property costs large lot requirements local governments, citizens who don't know any better. minimum square footage for new construction eliminate access to affordable housing, thus disproportionately affecting minorities More smaller group homes are needed that will house 4 - 7 residents and support staff. Most county commissioners in our area frown upon adding shelters or group homes to their area. Most zoning ordinances, regardless of jurisdiction, prescribe appropriate zoning districts for this type of use. Neighborhood resistance to group home opportunities Nor in my backyard mentality Not allowing "group homes" or community living arrangements in neighborhoods Once again those areas with actual qualified zoning staff do better than those of us that just place a local body in the position. Our organization continually fights jurisdictions that refuse 2-3 unrelated individuals to reside in the same home. Also, the lack of by right locations for these types of housing Overly stringent "definition of family" ordinances limiting the # of unrelated residents in a single home in certain areas. Multi-family zoning in traditionally single-family neighborhoods that encourage property owners to sell out to developers. A need for inclusionary zoning to encourage diverse housing opportunities Prohibition against houses for special needs, or limited the proximity of certain type of housing within a specified distance or similar dwelling. Residential neighborhoods do not want group homes, so they protest to the cities for re-zoning. Restricting the placement of group homes/apartments Same thing as land use. There are a multitude of factors that determine zoning. Unless it's specifically done to act as a barrier to a protected class, it is not a violation. See above See above answer Significant attention is needed on this matter. As one arm of state government works to re-settle people from institutions, local governments often (and sometimes in error) cite zoning & fire safety codes that make it very expensive/difficult to secure properties. The allowable zoning for group homes has a different classification though it is usually at the edge of a R-1 area. Then it is usually the neighborhood residents that come out against a zoning change to allow for group homes. The City of Atlanta restricts the placement of single site permanent supportive housing (no 2 permanent supportive housing sites can be located with 2,000 feet of one another) The City recently face NIMBY with a group home request. The planning department has worked diligently to update the codes to prevent this from happening again. There are zoning regulations that prohibit housing on the second floors of downtown buildings. There have been several occurrences during the past year of communities who tried to pass zoning laws to keep out group homes This is a common problem related to zoning This is huge issue for homes for people with dev disabilities, mental illness and phys disabilities. Talk to SPADD, CSBs, commissioner frank berry at dbhdd Tried to do a group home and could not have the zoning changed even though everything was in foreclosure all around the property. Also with homeless.</p>

We are many thousands of units short of affordable housing in Savannah. This shortage for the general community contributes to the fact that little effort is paid to housing development for special populations such as group homes, housing for the homeless (such as SROs), low income senior housing.

Zoning for Low Income housing is extremely difficult from NIMBY issues.

Zoning laws can be restrictive in a number of ways beyond just the placement of group homes or multi-family structures. They can define what constitutes a family in a way to restrict access to who qualifies for a single-family home.

Zoning laws can contain certain requirements, like overly high minimum building sizes, that can effectively keep out certain classes of people because they cannot afford to build a house that large.

Zoning laws tend to favor low density residential development and the aggressive restriction of non "single family" residential uses adjacent or nearby.

Zoning ordinances, such as those that restrict non-home owner occupied businesses, are sometimes used as proxies to keep personal care homes out of residential neighborhoods. It makes it very challenging to provide sufficient community placements for persons with disabilities who require 24/7 services or family-style living situations.

Table B.16
Are you aware of any questionable practices or barriers to fair housing choice in occupancy standards or health and safety codes?

The State of Georgia
 2015 Fair Housing Survey Data

Comments:
<p>Actually it can be opposite with state dch hfr crackdown on unlicensed personal care homes being used to remove people with mental illness and other disabilities out of municipalities</p> <p>But I suspect there is not much enforcement unless some one complains to the right person in government or law enforcement</p> <p>Code enforcement is inadequate everywhere, for every population.</p> <p>Code is also being inadequately enforced in student housing as traditionally single-family homes are rehabbed to accommodate multiple students</p> <p>Codes are being enforced differently in immigrant and minority communities when landlords feel like it; vacant properties are maintained better in majority white areas than they are in minority areas.</p> <p>Codes are inadequately enforced in low income homes.</p> <p>Codes are not enforced or even inspected in low income rental properties; we have reported such problems ourselves to code inspectors in the past and nothing is done.</p> <p>Codes being inadequately enforced in poor communities</p> <p>do not know but suspect this could be a problem</p> <p>Enforce the rules and assessing a penalty</p> <p>Federal funding used/acquired in the construction of single-family and multi-family units must include the requirement for basic accessibility. This means at least one zero step entrance, wider door-ways and halls, at least one bathroom on the main floor and extra blocking behind the bathroom walls.</p> <p>government laws that prohibit houses being closer together</p> <p>Health and safety codes do not seem to be enforced in mobile home parks.</p> <p>I am aware of several incidents of this. I suspect that illiteracy and over willingness to trust on the part of the renter at the time of signing worsen the problem of bad landlords.</p> <p>I definitely have seen new housing that was substandard</p> <p>I had this a number of years ago with a former Mayor in Cornelia who rented the worst hovels to immigrants and thought it was okay. He controlled his city employees under threat and bullied the county employees with politics if anything was said. I understand it has improved with a change in mayors and managers</p> <p>I have a client who is dealing with a landlord who is known to evict people who have complained over the same health issues. Why does she have to fear getting evicted instead of simply released from her lease as the relationship between the two is so toxic that the landlord really seems to be preying on people in rough situations.</p> <p>I hear they can not rent to a family due to size- and I see both sides to this situation</p> <p>I understand this is an issue and many people do not know it is a form of discrimination</p> <p>In the City code enforcement is more proactive. Due to inspector available the County enforces those codes</p> <p>In the same community were we have one of our programs the latino population is not given the same care in response to issues.</p> <p>Lack of funding (city) and fear of eviction by residents keeps this a huge hidden problem. Owner/landlords have too much power and residents have too little.</p> <p>mold testing in poor communities.</p> <p>Number of occupants per unit/bedroom being exceeded.</p> <p>Primarily in public or subsidized housing and allowed by the federal enforcement agency, HUD.</p> <p>Property that houses immigrant communities have taken advantage of this population. The fear that the immigrant population will be deported keeps this population hidden and not wanting to file a complaint. Housing providers use the consumer's illegal legal status to intimidate this population and invoke a "take it or leave it" practice when renting substandard and hazardous housing units, and applying different terms and standards in the rental agreements. Fear will keep the immigrant population to report violations to their housing rights.</p> <p>Rural areas have fewer inspections</p> <p>Same answer as in #2 above with regard to people with disabilities & their move into home & community based settings.</p> <p>Slum lords!!</p> <p>The unrealistic standards placed on construction or repair of low income housing prices them out of reach for most very low income people. (Lead, Mold, Radon, Flood plains, construction codes, etc)</p> <p>There are landlords who just don't care...and will rent out inadequate housing to immigrants thinking the immigrants won't tell on them. I've seen poor housing in this area.</p> <p>There are several housing complexes that offer sub-standard housing. Many of our clients end up taking these housing options because it's all they can afford.</p>

There does not appear to be any compliance to health and safety codes in minority neighborhoods.
 There is rental property in this county that i wouldn't let my dog live in.
 This would be illegal and unethical
 Trailer parks that are run down, hispanics having to pay for it as if it were proper dwelling. Usually persons who do not speak the language. Well known slum lords- I have seen the properties run down and roach infested prey on the immigrants and single mothers- I have been told by a county official that sometimes it is bad to condemn these places bc people become displaced or homeless-
 We have lots of unfit housing that low income persons rent from landlords who will not update properties.

Table B.17
Are you aware of any questionable practices or barriers to fair housing choice in property tax policies?

The State of Georgia
 2015 Fair Housing Survey Data

Comments:
<p>Although there is a GA law passed many years ago that allows a home owner to claim a tax deduction for retrofits, it is unclear how many people are aware of this and it is unclear how many Georgians are using it. I have been unable to get this information from the Department of Revenue.</p> <p>Are no incentives for existing property and to the best of my knowledge incentives are only available for renovated commercial property regarding the dollars spent to modify the structure for handicapped accessibility. Existing property is grandfathered in does not have to be changed until it is purchased and rehabbed. Then you have to meet the federal code requirement which I believe is a small percentage of the number of total units.</p> <p>As so many agencies have had reductions to budgets- I will suspect there in little to now incentives available</p> <p>Based on the area of town</p> <p>Enforce the rules and assessing a penalty</p> <p>example above</p> <p>government laws that prohibit houses being closer together</p> <p>I have not considered this until asked= but I think Dalton area would be able to utilize tax incentives to improve our area</p> <p>If this is an issue for you then it needs to come out of state funding and not local funding.</p> <p>Lack of tax incentives for making reasonable accommodations or modifications for the disabled; lack of discounts on tax bills for the poor and elderly results in having a disparate impact in low-income neighborhoods that have "gentrified" leaving black elderly unable to "age in place" as white people move in.</p> <p>Many landlord's are not able to make the necessary accommodations due to lack of funds. None paying and late paying tenants creates a slow turn over therefore an incentive would be helpful.</p> <p>Many States are now Taxing Low Income Properties unfairly which results in a burden on the Low Income Tenant and Owner. This Practice results in limiting housing to minorities and protected groups by keeping housing out of certain areas. It is unfair and in my opinion violates Fair Housing.</p> <p>Need for tax freezes for longterm residents of rapidly gentrifying, traditionally working-class neighborhoods. New approach to assessment that bases value on actual property rather than sale value of nearby new or massively rehabbed properties</p> <p>No incentive are forthcoming from any taxing entities to help with any efforts to improve quality of or availability of fair or any other housing</p> <p>Property tax assessment of low income properties on an equal level as conventional/non-rent restricted properties</p> <p>Property tax freeze in columbus discourages home owners from making improvements.</p> <p>Stop trying to address the issue of access through the creation of separate housing with modifications for 'the disabled' and begin to require universally designed and visit-able housing in all new construction.</p> <p>tax incentives for aging in place -</p> <p>Tax system rewards owners of deteriorating properties by giving them a lower tax rate - at some point you should be penalized for endangering the safety of neighborhoods through blighted properties.</p> <p>taxing low income housing (LIHTC) at the rate of for profit/non rent controlled type units</p> <p>The example is great.</p> <p>The Memorandum of Understanding under the Treasury coordinates procedures for notifying the state agencies and IRS of charges, lawsuits, or other actions under the Fair Housing Act involving an LIHC property.</p>

Table B.18
Are you aware of any questionable practices or barriers to fair housing choice in the permitting process?

The State of Georgia
 2015 Fair Housing Survey Data

Comments:
<p>Cities won't rezone if they think affordable housing is going in. If the zoning is already present, many are a bear in the permitting process.</p> <p>Enforce the rules and assessing a penalty</p> <p>government laws that prohibit houses being closer together</p> <p>I can see where this would be a problem; however, I do feel that all legal citizens in this country should be able to speak and understand English as a condition of citizenship.</p> <p>I doubt this has been addressed and probably needs to be investigated</p> <p>I have managed for 15 years, and have yet to see any Corporation have their documents drawn up in any language besides English.</p> <p>I have many individuals who are Deaf/hard-of-hearing/deaf blind that when they go into a renting office for a complex or a realtors</p>

office there is no accommodation for communication. The landlord/realtor/complex managers are not very accommodating for them and in the end they lose money by this.

I hope this is being addressed and will not be the case in the future

In majority if cases documents are written in only one language. Who is going to interpret and explain the documents thoroughly. Intending homeowners have difficulty understanding materials on their own without interpreters.

It is very difficult to understand the process and I've heard that accessibility measures have been denied. There is also a language barrier.

Lack of neighborhood notification when new large-scale neighborhood adjacent projects are proposed. Lack of protection for neighborhoods from increased traffic, pedestrian safety, & other quality-of-life threats posed by large-scale new development near neighborhoods--need for required Traffic Impact Analyses, Parking Impact Analyses, and Impact Fees on developers to fund pedestrian safety & traffic calming measures in nearby neighborhoods

local government does not currently provide that.

Not offering documents that clearly communicate processes or in languages other than English

Not offering written documents on procedures in alternate languages

Offering documents in different languages is something that needs to be worked on.

Once again a funding issue. If needed, and I know a few communities that have large immigrant communities that are not well versed in the English language. However, I am even more concerned about people who can't read at all - how do we get them to first care, and then understand.

Our County Code is only available in English. If asked we try to run it through Google Translate as it is available on-line. This is not an attempt to limit access, we just don't have funds to publish everything in multiple languages.

Permitting documents are English only in our area

Resources are not available to provide documents in different languages. Additionally bilingual staffs are rare

Use of business license laws along with zoning to prohibit personal care homes

Various municipalities do not offer permitting documents or a written process in Spanish or in large print for the disabled.

Why the hell would you offer this in alternate languages? What liberal moron wrote this crap up?

Table B.19
Are you aware of any questionable practices or barriers to fair housing choice in housing construction standards?

The State of Georgia
 2015 Fair Housing Survey Data

Comments:

all public housing units, homes, etc. should be accessible, whether new or retrofitted. The demand is growing, plus people with physical disabilities like to visit each other. this also goes for sensory disabilities too: talking environmental and appliance controls for people who are blind; flashing, vibrating alerts for people who are deaf, etc.

Each of the "Accessibility Laws" use different standards (UFAS, etc) under which multifamily units must be built. They are so confusing, along with DOJ and HUD Memorandums of Understanding and "exemptions" that even the "experts" can't agree on all issues. DOJ, in conjunction with the Architectural industry should write one set of guidelines that is comprehensive, fair, and non-confusing. It is not that we, as developers, contractors, and owner, don't want to comply with Accessibility Laws, but rather that the laws themselves are subject to interpretation and there is no "FINAL WORD" on who is right or wrong.

Enforce the rules and assessing a penalty

Federal courts tend to allow violations en masse when no one sues...Single family construction is not covered. And, aggressive enforcement.

government laws that prohibit houses being closer together

I think the example is true - better accessibility would help all of us as we age.

In my neighborhood, several residents have encountered plumbing issues. Because one resident needed to consider improvements due to her husband's disability, she found out that the plumbing in her house had lots of shortcuts which was estimated to cost a couple thousand to correct.

It appears that there are no housing construction standards, as so many units do not comply, if they are built by "private property owners".

Market rate multi - family has a set of standards but if public dollars are used in anyway, then there are a different set of standards so clear, simply written guidelines & training is needed.

Not enough accessible housing

Not enough housing in our area has historically kept home and rent prices higher-

Public officials in charge of enforcing and developers who build are not familiar with guidelines for construction of accessible housing

same as stated in a previous answer. Pool not accessible, once you're inside the apartment it not having adequate space for wheelchairs/walkers.

See above

Some times it seems that some of the standards are interpreted by people differently resulting in some items failing inspection that doesn't and things passing that shouldn't.

Stop trying to address the issue of access through the creation of separate housing with modifications for 'the disabled' and begin to require universally designed and visit-able housing in all new construction.

The guidelines are not being enforced for construction of accessible housing/units. No oversight.

The Memorandum Of Understanding also calls for training for architects on the accessibility requirements.

There should be one standard combining all the different regulations. And only 1

They assume most people understand the guidelines but if contact is needed they are not assisted

Too complex. Too high. Too pointed toward enriching certain contractors.

I think the standards in ICC with GA amendments are clear. I believe it is more the builder/owner doesn't care (I need to be below X dollars to make this work for me; I'm building this stuff to help the community so you should make me meet the ICC code" etc.

Table B.20
Are you aware of any questionable practices or barriers to fair housing choice in neighborhood or community development policies?

The State of Georgia
 2015 Fair Housing Survey Data

Comments:
<p>Again, blocking housing</p> <p>Again, this can be shaped by the comprehensive plan or future land use map to only permit certain development in a narrowly defined area.</p> <p>City focusing on building expensive homes for tax purposes and not allowing affordable apartments to be built.</p> <p>City of Valdosta. The city council and its P&Z board discriminate against multifamily developments in certain areas, even in neighborhoods for which they have designated as mixed-use and transitional areas.</p> <p>Community housing development is and has been done in the same communities with no plans to include economic development. County or City Development Authorities do not want low income housing in their city. It brings down the value of property that potential businesses might purchase.</p> <p>DCED encourage development in undesirable areas and work with groups to provide funding for development.</p> <p>Enforce the rules and assessing a penalty</p> <p>Federal Title VII New Communities Program has overshadowed the significant number and performance of other large-scale, planned communities.</p> <p>Government funding is usually tied to a specific area .. some called economically disadvantaged area.</p> <p>government laws that prohibit houses being closer together</p> <p>Housing authority redevelops public housing properties into mixed-income properties, but fails to provide for displaced predominantly African-American tenants.</p> <p>I do think our community development policies, while intended to support high-poverty neighborhoods, can wind up segregating whether intentionally or not.</p> <p>Issues that affect affordability of housing disproportionately impact minorities, immigrants, and persons with disabilities.</p> <p>Communities use affordability as another tool to discriminate against minorities, immigrants, and others that are different.</p> <p>It is too small of area and is not helping a larger area</p> <p>It seems these policies are not marketed to a wide audience</p> <p>Many cities in some counties in GA are given little or no attention and resources resulting into blight; businesses tend to close. No access to grocery stores.</p> <p>More affluent areas tend to get the most attention.</p> <p>Neighborhood and community development policies are not distributed to the average community of color. These communities are occupied by absentee landlords and operated through blind deals with real estate management offices</p> <p>NIMBY</p> <p>Not enough funding, HUD has cut our agency funds consistently over the past few years with not much hope for an improvement in the future.</p> <p>Once again a trained/educated staff instead of a local with connections</p> <p>Politics and Discrimination!!</p> <p>Public funds allotted for amenities and neighborhood improvements in majority white areas more frequently than in majority black areas, particularly where gentrification is occurring.</p> <p>See above</p> <p>Stop trying to address the issue of access through the creation of separate housing with modifications for 'the disabled' and begin to require universally designed and visit-able housing in all new construction.</p> <p>Targeting low-income areas means that you continue to concentrate poverty.</p> <p>There were new multi family housing units and developments that were tailoring their advertising to solicit single individuals and the rental prices did not support family with children.</p> <p>This happens, but not usually to purposefully act as a barrier to affordable housing.</p> <p>This is not unusual in many zoning plans.</p> <p>Unfortunately neighborhood groups can organize against projects to the detriment of those who need housing. Elected officials are often reluctant to override these groups even when the need is critical.</p> <p>Use of home ownership groups to prohibit personal care homes</p> <p>What is wrong with you people? It always starts and finishes with ZONING. Once a property is built no one I know would turn away a paying renter, but before hand, because the program is called, "Low Income Housing Tax Credit" the image people get is busing poor black people in from downtown Atlanta/Athens/Augusta/Savannah/Valdosta/Rome/etc.</p> <p>Yes. Everything goes to the city-</p>

Table B.21
Are you aware of any barriers that limit access to government services, such as a lack of transportation or employment services?

The State of Georgia
 2015 Fair Housing Survey Data

Comments:
<p>Affordable housing in Douglas and a Paulding counties are not within walking distance to public transportation.</p> <p>Affordable public transportation</p> <p>barrier for connecting people to housing and services through transportation is a issue</p> <p>But I do know there is a transit bus based on income- it runs daily and it brings people to receive services- person has to arrange 24 hours in advance</p> <p>Dalton and Whitfield County are rural and the only public transportation is operated on an "on-call" basis. Transit must be called 24 hours in advance and it depends on each route on how long the travel time will be. What exists is a valuable service but the</p>

person needing the transportation better not be in a hurry because there is no such thing other than paying for a taxi.
 disability transport needs to be more available in our community.
 Education is the barrier. Those who are being discriminated against are unaware of their rights and so they cannot blow the whistle on perpetrators when discrimination happens.
 Example Vine City station has no bus route. All access for public transportation is very limited.
 examples above are serious barriers
 For many people with disabilities, the lack of transportation and employment are limited throughout the state. This includes access to housing and education
 For people with disabilities the lack of access to government services is well known and documented. So if there are not jobs that means there are no homes and both of these are impacted by lack of transportation and quality direct supports.
 Getting from point A to point B, lack of public transportation.
 Huge barrier for people with disabilities
 In my community there is considerable opposition to the expansion of transportation opportunities to blacks and others living in the center city areas to get outside the center city to take advantage of job opportunities in other parts of the county.
 In smaller communities public transportation is a barrier to access to services and job opportunities. We hear this complaint repeatedly in our town of 13,800.
 In some of the municipalities in many counties transportation is one of the primary barriers to services and housing mobility.
 In south Georgia transportation will always be an issue. Even if eligible for bus service if the client needs to go somewhere after 6:pm they are out of luck. In South Georgia the only city I know of is Albany that has a bus service.
 Inadequate public transportation
 Inadequate transportation infrastructure and a lack of public transit everywhere outside of Atlanta.
 Lack of comprehensive public transportation is a problem in Cobb.
 Lack of financial aid and cheap transportation available
 Lack of funding for transit compared to other transportation funding has severely limited access to housing, jobs, and services for people who can't or don't drive.
 lack of public transportation
 Lack of public transportation
 Lack of public transportation and employment services creates a major barrier to find affordable housing
 Lack of public transportation in rural areas is an impediment as well as a barrier.
 Lack of public transportation in rural counties and cities. Even if transit is available, the places and locations they will go are limited.
 Lack of public transportation in some areas where there is subsidized housing
 Lack of public transportation is a huge problem in this and many other small cities and large towns in the South. Cheap public transportation pollutes, and towns don't have the money for clean transportation. It's a big problem, and it limits the housing areas that many populations can consider.
 Lack of public transportation or pedestrian / bicycle friendly roads.
 lack of public transportation, competition for employment
 Lack of transportaiton
 lack of transportation
 Lack of transportation and employment in rural areas of the state.
 Lack of transportation and employment services
 Lack of transportation and lack of housing near jobs and schools.
 lack of transportation in rural areas greatly restricts the ability of people with disabilities to access government services,
 Lack of transportation in the northwestern arc were we serve is one of our biggest barriers.
 Lack of transportation outside of the narrow city limits
 Lack of transportation prevents access to employment
 Lack of transportation, day care and employment opportunities are barriers that have to constantly be addressed
 Lack of transportation, employment services, preventive medical care, not enough workers to adequately staff offices, reduced hours, no non-traditional hours,
 Lack of transportation, lack of internet access, lack of childcare, lack of educational attainment.
 Lack of transportation; government service hours are working hours and it is difficult for low-income persons to miss work because they often are in jobs without paid leave or with little paid leave.
 Living in areas that don't have public transportation is a barrier for those that do not live on public transit routes.
 Lots of transportation issues for Medicaid recipients.
LUMPKIN COUNTY DOES NOT PROVIDE PUBLIC TRANSPORTATION OR EMPLOYMENT SERVICES - CLIENTS REFERRED TO HALL COUNTY
 Many communities are not on a public transportation route which can cause an issue with the ability to get to specific locations.
 Many low-income neighborhoods do not have access to public transit.
 Many people who don't have cars don't have access to public transportation. Lack in rural areas.
 more access on line so transportation is not a barrier
 My county, McIntosh, has very little access to transportation and very little in the way of employment opportunities.
 No jobs in this area, no public transportation.
 no public transportation
 no public transportation except for taxis which are expensive
 No public transportation in area.
 No public transportation in our community - not even in the city limits
 No public transportation in this area
 Of course...transportation continues to be a challenge as we continue our auto worship and do not invest in forms of public transportation (especially the suburban Savannah areas). And while employment services are available...they are useless without adequate living wage jobs (those with criminal records have little opportunity to find work or housing).
 Our small town does not provide public transportation and that is how most rural cities are in this state.
 Outside of Atlanta, transportation or lack thereof limits access to government and employment services
 Plenty of employment services but many are unemployed. Transportation is better with our small transit service but they become more and more burdened by numbers- thus running late to locations and or forced to pick up early due to closing at regular

business hours. Some agencies try to transport people in the evenings for services they need during after hours.

Poor, communities do not have access within the outer suburbs to public transportation

Properties near MARTA train stations are often unaffordable & do not have sufficient subsidies. Affordable properties are often not near MARTA access AND para transit performance is abysmal so transportation is a major problem for people - both disabled & non - who cannot afford personal vehicles. Getting and keeping a job in GA is difficult for anyone of average skills/credentials; it is doubly difficult for people with disabilities.

Public trans

Public transit is limited and we have numerous missed appointments due to lack of transportation.

Public transit isn't what it should be and under employment remains a significant issue in our community, particularly in relation to housing costs.

Public transportation is a huge barrier to housing options. A broader more connected transportation system will connect lower income and disadvantaged tenets with a greater variety of housing options.

Public transportation is always lacking, but many times its a result of how a city is designed. Many cities just don't have the resources to completely change how its transportation infrastructure is setup. Citizens also have the right to determine how they will spend transportation infrastructure dollars.

public transportation is of major concern. lack of affordable transportation options for those in need - particularly with families and children in school - are extremely difficult.

PublicTransportation. To a Government entity is hampered in south Ga due to lack of Transportation ie buses

Recreation is unavailable to low income Dublin children who do not have transportation to the primary facility which is miles out in the county.

rural areas suffer due to lack of public transportation

Rural ares do not have transit services available daily, trips have different costs for different tasks.

Serious lack of transportation in rural aeas

Sidewalks, bike lanes and access to public transportation are not incorporated in all developments.

Small Rural Towns,

Some of the citizens, customers, residents that I work with and for can't be bothered to even care what government is let alone getting up and coming to talk to someone on staff. They can get to Albany but it is to much to come to Cuthbert to talk to us. We have public transportation available on a per call basis - but a stop for government concern is not a priority.

Some rural parts of county are not serviced by public transportation.

Some smaller towns do not have any public transportation. Many people can not work due to no transportation and few jobs in the area

South Atlanta and North Atlanta outside the City transportation is limited

terrible, impassable sidewalks, no sidewalks, lack of affordable and accessible transportation,

The Department of Community Affairs disallows tax credit properties from being built without connections to sewer (i.e. no septic), savvy small towns (yes, they exist) try to move any developer to that part of town knowing it won't work.

The rural areas have little to NO transportation. When the individuals call to get help they are usually directed to a website, which many of them have no access too. So they are stuck because the people on the phone who should be willing to help them, do not do it.

The suburbanization of poverty brought about by the gentrification of many in-town & urban areas pushes the very poor to the outskirts of urban/commercial centers where they must rely on cars to access jobs, education, & services. Children cannot walk to schools in these areas & parents are less likely to be involved while older kids are less likely to participate in extracurricular activities & more likely find trouble in their neighborhoods or get hit walking on unsidewalked, high-speed suburban corridors.

They are also less likely to find jobs to which they can walk...

There is a lack of transportation in Dalton

There is a lack of transportation in our area as well as employment.

THERE IS A LACK OF TRANSPORTATION. THERE IS LITTLE EMPLOYMENT SERVICES.

There is a lower number of services offered and rendered in many neighborhood of color.

There is no mass transit in any of our counties

There is no public transportation in LaGrange, GA. Most persons are forced to take livery cars. In fact, car services from Columbus and other areas are moving into LaGrange to take advantage of the absence of public and/or affordable transportation in LaGrange, GA>

There is no public transportation in the 4 county area that our agency serves.

There is no transportation to assist anyone.

Transit in exurban counties is difficult to access and unreliable.

transportation and employment opportunities are major issue in rural areas

transportation

transportation and employment

Transportation for public use to work or doctors.

transportation in rural areas continue to be an issue

Transportation is a challenge all over the state of Georgia. In many rural communities if there was funding to assist with transportation the transportation itself is not available to access.

Transportation is a continuous problem

Transportation is a huge issue. No public transportation.

Transportation is a large issue and creates a major barrier.

Transportation is a major issue is rural south Georgia

Transportation is limited in the area which hinders employment

Transportation is not always available to those that need a ride to work.

Troup county doesn't have public transportation so it would be difficult for people to go to jobs and to receive government services.

Unwritten policies. Prejudice that is unfounded (entirely unfounded).

We do not have transportation readily available and do not know that employment services is available to all in the community.

We don't have bus service in this county. DOL is only here a couple of days a week.

We have a free program, but transportation is a key problem with citizens accessing GED education centers.

WE have a lack of public transportation in Gwinnett. Buses are very on limited schedules

We provide subsidized bus service. You must call for pick-up but for \$2.50 you can ride to any destination in our county or any of the five surrounding counties.

Well with the problem with me, my case work from waycross told me that she i had to be out where i stay June 30,2015, but now im out of a job cause she didn;t sennnd my paper work to Eastman Ga. so now I don't know how im going to take care of my kids are bills and i don't haveno where to go, so now i got to pay for somewhere to stay but i don't have any money to do this so now i might got to sleep in my truck with my kids I need help

Whitfield Transportation is the only local area transportation service. It is difficult to use because of scheduling practices and the unpredictability of arrival and departure. People must call 24 to 48 hours in advance to request a pick up that could arrive an hour or more before the scheduled time leaving clients stranded and frustrated.

yes to both of the above in this community...even no income homes have to pay to use public transportation

Yes, in our area, the smaller cities do not have or offer affordable transportation or public transportation

Table B.22

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

The State of Georgia
2015 Fair Housing Survey Data

Comments:
<p>1) Renter's insurance is being required of housing authority properties managed by third party providers. Properties are comprised of low-income, predominantly African-American tenants thus having a disproportionate impact on communities of color.2) Tax credit properties impose unreasonable occupancy standards (no criminal history in last 99 years). City of Savannah has similar problem with Crime-Free Housing Program.</p> <p>As mentioned, Crime Fee Housing Ordinance is a major problem for housing access of persons with a criminal background. This ordinance applies to anyone in the household.</p> <p>availability of adequate housing vouchers</p> <p>DCA's interpretation of the DOJ settlement, as reflected in recent QAPs seems heavy handed. The settlement allows for up to 50% of supportive housing for the disabled to be "congregate." Although DCA cannot articulate the mix/ratio of congregate to scattered site - it appears the QAP reflects a preference only for non-100% communities. (Single-site options are part of the solution - not the enemy of - the DOJ settlement.</p> <p>Federal courts tend to allow violations en mass when no one sues...Single family construction is not covered. And, aggressive enforcement.</p> <p>Ga Law does not protect low income families using vouchers due to job status when trying to rent.</p> <p>Housing preferences not being utilized at all public housing authorities</p> <p>Information regarding fair housing laws are not widely distributed, as such, people are not aware of the services that are available and/or their rights.</p> <p>Lack of funding to improve conditions which act as barriers</p> <p>limiting household types puts limitations on housing choice.</p> <p>Perception and reality are very different. Sometimes you just need to reach out and not trust what someone in the community is saying.</p> <p>Personal care home regulations prohibit people with disabilities who need more than one person to transfer from bed. This is also problem with fire code regulations. This forces many people to live in institutions</p> <p>Politics and Discrimination!!</p> <p>RESTRICTED AREAS DO NOT ALLOW CERTAIN THINGS TO BE BUILT OR PUT ON LAND.</p> <p>Sate laws prohibiting progressive property taxation based on income</p> <p>Schools, BOE are not required to work with local government services to ensure adequate water, sewer, roads and social services are available to support the students and families</p> <p>Some governmental offices provide poor or inadequate sevicees and do knot provide funding to the right organizations. As a results the poor residents of those counties receive no services due to inadequate funding fundin</p> <p>staff pesonalities</p> <p>The fact that there aren't any new regulations to help eliminate barriers. Old policies need to be amended to be more inclusive and universal.</p> <p>The national policy of "mandated" institutional care vis a vis "optional home & community - based care" is a significant barrier for most Southern states. The South has a higher population of impoverished people who are on Medicaid combined with below average investment in leading edge, cost - effective models of service delivery.</p> <p>There are no funds that are for and only for or can be used for fair housing.. that I know of</p> <p>This is a witch hunt by the liberal admin currently in power. If you look hard enough, you find something to justify your employment.</p> <p>What BS. This section is total BS.</p> <p>victims of discrimination rarely know their rights. There is a need for action and advocacy in the disability community regarding access to affordable, accessible and integrated housing and access to public transpiration.</p> <p>Y</p> <p>yes- restricting those who have felonies and immigration</p> <p>yes, see above</p>

APPENDIX C. MINUTES FROM THE FIRST FAIR HOUSING FOCUS GROUP

Comment 1: Explain that. What do they do? They certified that they were adhering to the fair housing, but what didn't they do?

Comment 2: Was it an intentional false claim or did they make a mistake? I might check a box that is false, but not intend...

Rob Gaudin: They have to file this AI with HUD. Precisely speaking they don't have to. They have to get the chief elected officials to sign it and then if HUD asks for it you have to submit it. They asked for it and they did not consider race and the racial concentrations or the racial concentrations of poverty.

Comment 3: In the AI?

Rob Gaudin: In their AI. During the suit they found over 40 years ago that there weren't these concentrations and after they filled the housing, there became these concentrations.

(Presentations)

Comment 4: So the proposed rule talks about the assessment of fair housing. Since it is a proposed rule we are still working to create our Analysis of Impediments, because that is the current rule in place.

(Presentation)

Comment 5: We see that all the time where they are on two parallel tracks that never cross. FHEO is with its blinders on that this is all you need to do and if it is contrary to the programmatic requirements; well those programmatic requirements are considered impediments. That is what I have been told. So it is crazy, because they are under the same umbrella, but there is no dialog.

Rob Gaudin: That is correct.

Comment 6: We found that. We were trying to get an FHAP approved we saw a lot of turf. Of course we are doing the right thing. We saw exactly what you are talking about a lot of back and forth. It makes it difficult. It makes it hard to deal with.

Rob Gaudin: In the current environment when you fill out your Consolidated Plan there is no place in this template to put in fair housing. There is no place. Meanwhile FHEO is going where is it? So we are a little bit between a rock and a hard spot on this. Right now we are still operating under the fair housing planning guide even though it might go up in smoke in July. That is what is happening.

(Presentation)

Comment 7: Jurisdictions, is it by state? Is it by County? Does it vary by each state because you said the planning of the analysis is done by jurisdictions? How is that?

Rob Gaudin: What we are doing here is each entitlement has to do this AI. So the state doesn't have to do and you might potentially have a conflict is you do the whole state and the entitlements. What we are doing here is all entitlements as one area on this map. So in some

sense we are going to look at all non-entitled areas which is all the rural parts of the state. We are going to look at a selection.

Comment 8: By entitled you mean CDBG entitled cities.

Rob Gaudin: And HOME.

Comment 9: Bibb County called me a month ago and we have been helping them with their AI and it has been and they just went from a city to a city/county type model, but HOME and CDBG still in the confines of the county. So they are working on it now. So when that is complete is it sent to the state or is it?

Rob Gaudin: If they are an entitlement it is sent to HUD.

Comment 10: It is sent to HUD directly.

(Presentation)

Comment 11: The state will call and request for the Analysis of Impediments overall.

Comment 12: That is what I thought.

Comment 13: We will able to see what each jurisdiction is saying their impediments are. When we get ready to do our rounds for funding we will try to address those issues.

Comment 14: I'm sorry. Who are you with?

Comment 15: Here, DCA.

Comment 16: I just want to make sure before I say something wrong?

(Laughter)

Comment 17: So you are a consultant to DCA? So are you doing, is DCA doing entitlement areas as well as entitlement cities? Are you duplicating what is being done?

Rob Gaudin: I would have to say no. We are reviewing what the entitlements have done. I think we are under contract to take a look at five communities and just point out the differences. There is going to be differences. Significant differences. This is urban verses rural. This is really what we are talking about. I have some numbers so we can walk through urban verses rural and see that there are some really significant differences. The larger narrative in the State's AI and of course we will talk about the State, but we are really focused on the non-entitlements and comparing ourselves to the entitlements. Now PHA's where they make a play in this, HUD is encouraging them to adhere to say they were in Atlanta, the Atlanta AI. If they are somewhere located somewhere else in Georgia they would perhaps select the State's. Then you could certify that you are affirmatively furthering fair housing without conducting your own AI. So that is how it is cost effective.

Comment 18: So I will also add to that. So I am a planning and policy analysts here for the state. So when the PHAs send your certificate of consistency in, read them, and send you questions like did you do this or did you do that or why are you trying to say that this housing is only for this [particular group and what happen to this other housing group over there. I pretty much do that here. So when you send in your information you will get a whole lot of

questions form me. In the past I am not quite sure that they actually did that. They would probably just read it and say.

(Introductions)

Comment 19: Do you expect if Housing Authorities submit these affirmative fair housing market plans. I guess that is what we are talking about.

Rob Gaudin: That is for HOME program?

Comment 20: It might or for HUD I am not sure. It might contradict what the local jurisdiction is saying. Do you expect to see some of that where the county may do an Analysis of Impediments, but here with the Housing Authority might not agree with everything. The counties document...

Comment 21: Might be a little bit different.

Comment 22: Do you expect to see some of that?

Comment 23: Yes we do. Each area is different, but with you all being so close together we would hope and anticipate that the two of you or the group would at least talk to each other.

Comment 24: It looks like they are.

Comment 25: It would be as to his point that some jurisdictions you will have and we know jurisdictions and all of us around the table know of jurisdictions where maybe the Housing Authority is not talking too much to the local government. They are in their own little world. It will be interesting to see.

Comment 26: Or the local government is not listening to them.

Comment 27: Yes that is more like it.

Comment 28: We may have a more heighten awareness and interest than the local government.

Comment 29: Have you done an AI in the past?

Comment 30: We have not as a Housing Authority the city/ county has.

Comment 31: Their Consolidated Plan.

Comment 32: Yes, and they will say what do you think about this paragraph? What do you think about what we have found and we will add in our two cents about Section 8 and Public Housing and if we have done tax credit and that kind of stuff we add that in there. So we work closely with them in our jurisdiction. They do it every year or is it every five years or every year?

Rob Gaudin: You can do it three to five.

Comment 33: Three to five depending on your Consolidated Plan. At least they should.

(Presentation)

Comment 34: It is also trending to more balanced in the entitlement areas.

(Presentation)

Comment 35: Yes, absolutely.

Rob Gaudin: Are they residing in one or more particular areas?

Comment 36: We have seen some in middle Georgia, but you have to remember that we are starting from basically zero ten years ago. So percentages will, percentages will increase. You have to remember that in Macon.

Rob Gaudin: One is infinitely greater than zero.

Comment 37: Yes, so that may not be a particularly telling because I think the percentage increase would be pretty dramatic, but relative to the other metro areas of the state I think it would still be pretty low. That is just a guess.

Comment 38: So, I am just going to throw this out because I understand what is happening here and I know at least Metropolitan Atlanta is very different. The problem I have with minority concentration in the city of Atlanta is that HUD makes the assumption that the minority concentration is poverty and minority concentration and poverty are two separate things. Atlanta's may be minority concentration, but it is not necessarily poverty. I kind of have an issue with that. I am just throwing out my comments, but I also and part of what I think this does not take into account and this is me never studying and it is never just just we have a concentration in DeKalb County of areas of people in certain pockets and that is not necessarily driven by housing as it is a culture and assimilation and by when they come and they move to Georgia, they move to where ever their base population is and it is not necessarily about housing choice. So is any of that being considered when they talk about concentration and deconcentration, because it really is a cultural thing. We have a high population of Somalians.

Comment 39: I was going to say the Sub-Sahara.

Comment 40: Right, but it has nothing to do with housing. It has to do with my cousins were here first and I followed my cousins. It is the community.

Comment 41: If they come to Macon they are going to their families.

Comment 42: I understand the purpose of it, but I think there are some fundamental things that are happening that have not necessarily have to do with poverty.

Comment 43: Or discrimination.

Comment 44: Or discrimination. I am just throwing it out.

Comment 45: I am glad to hear you say that. I don't want to be the one to say that. I can also add you have to remember there are a lot of places in Georgia where no-one wants to live regardless of race, color, or creed, because of lack of economic opportunities, schools, and so forth. It wouldn't surprise me to see minorities moving out of certain counties, because that is the last choice. Then again so are young black families as well that say I want to be a farmer.

Comment 46: We redeveloped the public housing site on Johnson Ferry right down the street from the mall and the majority of our residents are Korean and the reason they are Korean is because their friends were there and they invited their friends, but it didn't have anything to do with housing choice. It was just the familiarity in the culture and the community. So I just feel like that is a part the nobody really talks about. That is a huge part of.

Comment 47: Even your whole poverty thing. I know when we were doing the study up by Stone Mountain, because it is predominantly and there is a large population of black families that automatically are like why are you building there? The wealth...

Comment 48: The City of Stone Mountain.

Comment 49: It is a very wealthy community. So it is the assumption so if it is majority of black that is going to be poor it makes it tough for us to...

Comment 50: That may be anomaly, because everybody is not like metropolitan Atlanta. I get that, but I just feel like people are not taking into consideration just the migration of immigrants in this country where people feel comfortable living, but that is just me.

Comment 51: You are correct, because we had the same thing. We have argued with HUD about certain concentrations and even in our high-rise communities we have a Russian population and we have a Korean population in certain ones and we have Korean translators and Russian translators, but as far as minority concentration you may have a minority concentration, but when you look at with the rents when you are doing different types of studies you find that what may be considered southwest Atlanta may be considered heavily minority concentrated, but then you have pockets of wealth in there too.

Comment 52: Absolutely.

Comment 53: You just can't take a brush and look at it and say southwest Atlanta or southeast Atlanta is not the same as Buckhead or northeast you have the same type of wealth.

Comment 54: Not to mess up.

Comment 55: We have done studies on this too.

Rob Gaudin: Your comments are totally well taken. On the other hand HUD is going to push us down this path. The most challenging are some in the arid West that have Native American Tribes on Reservations and Trust Lands and those are also areas of high poverty. You look at a map and you see that the only race, Native American and they are concentrated on a Reservation and what are you doing to do about that? Nothing. You don't even have jurisdiction there, but there are exceptions.

(Presentation)

Comment 56: May be boarded up.

Rob Gaudin: That is correct.

Comment 57: Do we take into account the housing bust that was going on during that time?

Rob Gaudin: Yes, but the 2013 indicates generally speaking vacant housing has gone up, particularly other vacant which represents those that are not for sale or not for rent or available to the market place.

Comment 58: That is probably indicative of that, the vacant.

(Presentation)

Comment 59: So In fact when I was talking to the County a couple of weeks back. They asked me do you ever get calls on someone saying I got my Section 8 voucher and such and such apartment building won't and they discriminated against me. We rarely get those, but if we do we refer them to HUD. At the local level we don't have the enforcement and so I turn around and ask the County what about and they had the same types of data points as the lending. So what if a certain bank and who is going to look at that bank and say why it that your bank has this is number is so skewed? So where is the enforcement? Certainly no one in our county is doing it that we know of. So is it FHEO that might come down to a bank in Macon Georgia and say why are your numbers like this?

Rob Gaudin: HMDA data, there are seven financial regulators and HUD is one of them. They have a group of lenders. Generally they are overseeing manufactured housing, HUD is. Other lenders they are supposed to all report the same thing and go through the same classes, but the timing of it doesn't always work. The Federal Reserve says you cannot inclusively say that our lenders are being discriminatory, because this happens everywhere, almost everywhere. Sometimes it is more outrageous, but three times the rate for those making more than \$75,000, thirds almost of the blacks get denied and only 9.3 percent of whites. That is challenging.

Comment 60: But you don't know if that is credit score or it doesn't appear to be income if it is over \$75,000 unless the housing cost to income ratio is skewed. Surely that data exists for further analysis on the reasons.

Rob Gaudin: It does not.

Comment 61: Really? Just the fact that they are denied.

Rob Gaudin: There are three fields for denial reason. You don't get the credit score, but you get a reason. Credit is often one and so is debt to equity and employment history and other is a big category. There is also missing is another one.

Comment 62: Other is a category?

Rob Gaudin: Other is a category, Missing is another category. They are supposed to put it in there, but they don't. They just skip it.

Comment 63: So if I am an underwriter and I check on my box other. Do I have to say...

Comment 64: That is out right discrimination.

Comment 65: That is where they are hiding it.

Comment 66: That is exactly where they are hiding it.

Rob Gaudin: Well we do compare by race the number of missing and generally speaking it should be 20 to 25 percent missing and I don't see significant differences there yet. I don't have a slide for that here.

Comment 67: To me that would be and if I am talking about impediments this would be a big glaring thing on impediments.

Rob Gaudin: Generally speaking it is not the hometown banker either. We can tell you who it is. The name of the financial institution is in there as well as which housing product they are selling.

Comment 68: You are saying generally it is larger, like the Bank of America is the big.

Rob Gaudin: It is usually not the home town banker. I will tell you that.

(Presentation)

Comment 69: The recession put a stop to that obviously.

Rob Gaudin: Well, this was because of the recession?

(Presentation)

Comment 70: So in other words a good healthy economic sign would be the increase of predatory lending.

(Laughter)

Rob Gaudin: Well that is not what I am suggesting. It is a state that doesn't get all over these guys. They still have payday lenders and car title lenders in the way too.

Comment 71: By the way are mobile homes included in this housing data?

Rob Gaudin: If they are on a permeant foundation.

Comment 72: They are bolted to the ...

Rob Gaudin: They are not considered mobile homes then. They are manufactured housing, so yes.

(Presentation)

Comment 73: We were going to and this is just a side antidote. We were going to use one of his entities as our tax-credit investor to buy the tax-credits, but in order to do so we had to use his manufacture product. We said no thank you we are not into that, but my guess is you are getting the same type of car lot financing as you are the people that continued to be denied and go to a manufactured home and get the credit taken care of on the lot are the same people that are getting messed over at the used car lot.

Rob Gaudin: Industry, you are in the banking industry and you are a lender and you have a variety of products for the person who isn't that articulate about their credit. You will deny them based on other or missing reasons and then you will feed them over to the predatory-style

product. I mean that is not happening so much anymore in the entitlement areas, but it is still occurring in the non-entitlements.

Comment 74: Back to his question about who is monitoring this and doing anything about it. Is FHEO looking at this type of stuff at all?

Rob Gaudin: No, they look at it in the AI and say that is a good analysis.

Comment 75: Another one of the banking pieces, so I don't know. When I engage with FHEO personnel many times they will say that your information is delayed and we are working on mega banking cases. I am always hearing that. I don't know if that infers they are reviewing this kind of data.

Rob Gaudin: Right, I believe that cases that come before HUD have been handled through their fair housing complaints system. That comes next, but generally speaking when you have a file of fair lending violations it will end up in the fair housing complaints. Those are large because generally you could begin to create a class action suit and you will go after a lender for that, but to get there is a lot of time.

(Presentation)

Comment 76: The totals are dropping.

Comment 77: In the disability the 504, look how it is creeping up. Well it dropped a lot, but now you have race 12, just in 14 and 22 it surpassed. We have seen a lot just in our business in the last couple of years a lot of things related to disability, a lot more than race.

Comment 78: I noticed that the non-entitlement areas the national origin number was 17, I think. So that might be the influx of other ethnicities.

(Presentation)

Comment 79: I don't know if that is even and this data is through 2014 and they are saying they have 30 complaints for the entire state. There are 30 complaints based on race?

Rob Gaudin: That is a basis. You can have more than and if you see the bottom row the basis isn't the only complaint. You can have more than one basis per complaint.

Comment 80: I know that we are currently working through discrimination complaints based on race and disability and national origin out of Sapelo Island and we are up to, there were over 82 or 84 initiated in 2013 and half of those were dismissed by HUD for lack of standing. They were alleging that they were property owners on the island. Under the Fair Housing Act they were able to dismiss half of that. So it is just curious to me that they have 2013 statewide 45, when I know for a fact there were over 80 filed against five respondents, DCA, DNR, the County Commissioner in Macintosh County, their tax assessor, I am missing one. I am saying that information.

Rob Gaudin: This is right from HUD.

Comment 81: That is just strange.

(Presentation)

Comment 82: Say that again?

Comment 83: They are just not providing you with information.

Rob Gaudin: They are not involved with housing.

Comment 84: The Georgia Commission on Equal Opportunity.

Comment 85: Is not involved with housing.

Comment 86: So we do have someone that is coming in for the afternoon session from Georgia Commission.

Rob Gaudin: Great. I would like to have the answer to this question.

Comment 87: We have and two or three years ago when we had complaints that we filed with HUD then those two bodies would contact us, but now that I think about it is just HUD that has been contacting us.

Comment 88: What are they doing, employment?

Rob Gaudin: They are more involved in employment. I think prior to 2011 they were substantially equivalent status. Meaning that they get paid for every complaint and they take over enforcement and since then they haven't I think they have lost their substantially equivalent status. I will find out this afternoon. If they just haven't been doing anything that would also explain why HUDs data has gone down, because they have to be dually filed. If you are Substantially Equivalent, they have to be filed with HUD and then you get the case, but if they don't get the cases then HUD gets to take care of it. In the non-entitled areas it is like one in two. So that is tiny, but at least it is race, disability, and familiar status are there historically. So we have a failure on the part of a state agency, if I can be so bold. Certainty it is a significant change from 2010 to 2011. That is just a massive shift away from taking care of fair housing compliance. So we have lost some institutional value there. The question would be should I articulate this as an impediment? Sometimes it is politically sensitive to do so and that you really in the end can't because you don't have the power to get them up on their feet and running. That is not good and I think the issues they have...

Comment 89: So you are going to put that as an impediments HUDs bad database?

(Laughter)

Rob Gaudin: There are two data bases. Even if you had substantially equivalent data, here the same number of complaints. Earlier, notice how many that the commission handled. That is not what HUD handled. They are different numbers prior to 2011. So even substantially equivalent agencies don't have the correct numbers. The same number of protections and I don't know why that it. I always ask for what I can get my hands on just to show it is a little bit of a moving target.

(Presentation)

(Discussion of Location of Survey link and contents of Survey)

Comment 90: These are questions and you are asking us for practices that we have been made aware of.

Rob Gaudin: Yes, are you aware of any questionable practices?

Comment 91: But something that somebody has reported to us or that we have observed. Not something that we read in the New York Times.

Rob Gaudin: That is correct.

(Presentation)

Comment 92: Racial concentrations exist in Macon, because of poverty and because of racial issues.

Comment 93: Lots of politics in Macon.

Comment 94: I mean a lot of it stems from economic issues. Is that and are you looking at that as an impediment because if you are in poverty you are going to live where public housing is? Public housing is typically in minority concentrated areas, at least it is in Macon, but that and we are not able to build new public housing. Is that an...

Rob Gaudin: The answer is yes and yes. The question is why is this that only choice they have?

Comment 95: I am not saying that, but that is and they don't with a voucher. If they can wait forever and get a voucher then they are free to take that anywhere they want.

Rob Gaudin: HUD is asking you to answer questions you are not able to answer. We are going to take an audit, if you will of where public housing is located. We are going to map it and as you suggest I believe that we will be able to demonstrate that they are largely located in low-income areas and are largely located in areas with high racial and ethnic concentrations. So what do we do about that? Now we have this investment that passed, but what do we do about it in the future. That is kind of the choices that we have in front of us. What do we do about the future? Do we demolish those homes and try to do scattered site at cost which means we would lose half of our housing. So these are just issues that we need to address. This is the history and where do we go from there?

Comment 96: Even on the voucher side you see concentrations because back to the income. I got my voucher, but my voucher because of the way the math works I can only pay so much for rent and the Housing Authority is only going to approve so much for the rent. So I am automatically limited. My choices are better than site based but you still see sometimes concentrations because of and especially if you have extremely low-income voucher holders going out there. We in the Section 8 world, some of us in this room are in that Section 8 world. We are and HUD wants us to let people know on the front end where the areas of concentration are so they know where they are and not to steer them there. You can't steer them anywhere with housing choice, but they implied that of course you want them to go to other areas away from the concentrated areas and sometimes that is difficult because of the money.

Comment 97: And payment standards. Even the laws here in Georgia don't protect family. If they don't have jobs and they have a voucher in their hand that doesn't mean a landlord is going to accept them. If they do and where as with other cities like in Illinois, they have laws that say you can't discriminate if they are without a job. If they have the ability to pay or rent the apartment you can't discriminate whereas here in Georgia you can deny.

Comment 98: You can deny. You can say that I am not accepting Section 8 vouchers.

Rob Gaudin: Exactly, because it is not protected.

Comment 99: It is supposed to be protected in tax credit properties. Atlanta Housing Authority is a Moving to Work agency, so we are exempt from most of the statutory and regulatory requirements like the 1937 Housing Act. So we are not subject to the laws. We have our own payment standards which are much higher than the HUD established ones, which would allow families with a voucher to move to the let's say the high rent districts. We still find that families tend to still want to go to areas where they are comfortable, but we are marketing the program in the Buckhead areas and the Northeast. Mostly Northeast and Northwest. We are not going to get into Class A properties. But we are looking at Class B that are near new construction sites of Class A. Class B are suffering maybe a little bit of vacancy issues, but hopefully we are going to allow opportunities to take place. Here is the menu of opportunities and it is up to the family still to choose and we are still finding that families for whatever reason and it could be an impediment that maybe you have a voucher that can pay the rent or be subsidized by the Housing Authority at a rent level that is affordable in this higher rent district, but we don't want a voucher family. So maybe that is occurring or otherwise families are still looking for that comfort level, but we are looking at ways to deconcentration poverty and deconcentration minority's concentration, but it is still left up to the family and of course that transition between the family and the owner or landlord. What takes place there we have no control over, so that may be an impediment.

Comment 100: Being a Moving to Work is HUD on the Section 8 side? I probably know the answer. They are not giving anymore HAP dollars. So you still have the same amount of HAP dollars and you are struggling with probably do I allow a Section 8 voucher holder to pay a million dollars in rent or a million people to pay a dollar? You still have that math problem no matter what. Your HAP dollars are...

Comment 101: We have ACC and we have our different allocations. In special purchase vouchers can mainstream or family unification you still have to rent those, but still our allocation is just under 20,000 vouchers. So we have some flexibility with respect to how we issue vouchers. We don't have to have 19,000 utilized.

Comment 102: But as your payment standards go up the number of people you can serve goes down.

Comment 103: If you are paying so much out in HAP dollars per person.

Comment 104: They have different metric. We still have to serve the same number of families if we were not an NTW agency.

Comment 105: Your funding is all in one bucket. So he is not just worried about I can only use this million dollars in HAP the other money that has come in whether it is the real estate, they can use that. There is a difference.

Comment 106: It's fundable?

Comment 107: Capital Operating subsidy.

Comment 108: That is a big help. That is a huge help.

Comment 109: But still we find that with even our public housing to make improvements. We don't have any family communities. We have two small family communities, because we demolished all of the large obsolete public housing communities. So we have 11 high rises and two small family communities. One located midtown and one is located near the stadium. We found that we are putting some of our voucher money into supporting the high rises. It is preservation because Capital Dollars are not as high.

Comment 110: Interesting.

Comment 111: Just speaking anecdotally in Macon from my observation where we can help promote choice in areas of non-concentration that is likely to happen to me and you might disagree in so called nicer areas, high rent districts where you have aging properties and because of economics now Class B properties will take the voucher holders where they didn't ten years ago. Once again within the matter of a year or two you have a new pocket of minority concentration, but it is in a better area and better school zone and nicer amenities and lower crime. I would say that is a success, because they have moved out of the inner city to a property that wouldn't want a voucher holder in 2000 and now is rolling out the red carpet for them.

Comment 112: Part of it is really the public sector development, the tax credit, the state. It is that avenue that can make this happen to be able to get people in the higher rent districts, but the problem is which is hard when you deal with QAP is if you are doing a tax credit deal your acquisition costs and everything that it takes to build in those areas you can't support that. So you have to build where it is affordable and so that is and you are talking about you have the public and I want to call it public, I guess that is right. You have the public policy and purpose and goal admission, but you are dealing with the private sector to obtain the land and the cost so they are not speaking the same language. So I don't know what you can do to fix that other than adjusting things in the QAP to allow for higher acquisition costs. I don't know what you can do.

Comment 113: DCA has done a few things. The give points for better school zones. They finally after five years have raised the TDC that allows for.

Comment 114: They are but the problem is now that the housing market and the economy is booming. Back when it crashed you could go to the suburbs. You could go and buy land. No way in the world are you going to get there now, because the market-rate developments are just taking over? I don't know how you fix that.

Comment 115: Here is a statutory issue. You get an extra point for being in a qualified Census tract so you are crazy if you don't look for a property in QCT. You also have a 30 percent basis boost of properties in a QCT. You are crazy if you don't at least look for properties, because these are statutory enhancements that are on the table and so you are stupid if you don't take advantage of those statutory opportunities.

Comment 116: I think too some of what we see and we are just outside of the city limits of Atlanta is transportation. We are talking about poverty. Especially if they are going down the second bullet there, people need to be able to get to work. They need to be able to get to the grocery store and some of our families don't have transportation. So where do they concentrate where there is by service, by train service or whatever. On the north side of our county, basically the north side doesn't want transportation there because it is going to bring in the

poor people or they don't want. It is kind of a social thing as well as the transportation and what is available for our families.

Comment 117: So let me throw out something that is really interesting. I love this right now. I know Atlanta may be a metropolitan anomaly, but what is the problem with people of the same culture and ethnicity being together as long as everybody is not poor? What is the problem with that?

Comment 118: That is the only place. The thing is if they told you could only live here, but if you choose?

Comment 119: I am just saying and we are just having a general conversation. If I am Asian and I want to live in my community and the area of concentration in Buford Highway and we are not necessarily in poverty, what is the issue? Why is that looked at as a problem? Poverty is the problem and not to me and this is just me and my soap box, not racial concentration. I think that is part of the issue. We need to look at the social and not the economics of it. Not the racial part of it. In New York don't people say that ethnicities live in the same communities? I am just throwing that out.

Comment 120: I think you go back to Civil Rights where people were told where they could live and I think that the government has come the other way and says that you can't do that. You can't say that because you are of this race and this nationally that this is the one place that you can live. I am saying that is why they make a big thing out of it. I don't know have they swung the pendulum too far.

Comment 121: The pendulum has swung the opposite way and maybe we need a middle ground.

Comment 122: One of the biggest impediments in Macon is actually supply. I have a waiting list and I am sure Atlanta does...

Comment 123: We do too.

Comment 124: I have a waiting list and 15 years ago this was unheard of, you remember. Public Housing waiting lists at least in Macon; we just didn't really have one. Now I have a Public Housing waiting list of 2,000 families and I have a Section 8 waiting list of 3,000 families. So I just can't work through, so one impediment is at least on the affordable side or Section 8 Public Housing, one impediment is supply. I don't have enough housing.

Comment 125: Adding a thousand units to...

Comment 126: In tax credit type stuff. Absolutely, through the tax credit program and the moratorium coming up here. There is a moratorium on public housing we will probably never build public housing again. So you have Section 8 vouchers, you have PBRA; you have tax credits and HOME, you just....

Comment 127: Have enough resources.

Comment 128: Exactly. If the poverty problem is not fixed somehow then the supply is going to continue to be an impediment. I just can't find somewhere. I am sitting on that Section 8 waiting list for years. How big is yours? It is probably huge.

Comment 129: We recently opened our housing choice waiting list.

Comment 130: Back in January, I think.

Comment 131: Yes and we had people registered to be considered for the waiting list. We had 113,000 and we selected through a random process. A third party did this for us, 10,000. So we are working on 10,000.

Comment 132: Out of 113,000. So it was basically a lottery system.

Comment 133: We are opening up our on the 28th, but it will be a lottery. We will get the rest. We have about 3,000.

Comment 134: So part of it is you have fair housing looking at it from a housing perspective, but if you don't have other player at the table talking about it collectively I am not sure how you get this even, I don't know how you make a dent in it. It is about education. It is about resources. It is about job opportunities. It is about a global issue and housing is just one component of that. So I'm just on my soap box today.

Comment 135: Well no one answered your question.

Comment 136: If I was being very candid and since we are a small group and whatever is said in here stays in here.

Comment 137: Actually they record it.

(Laughter)

Comment 138: My point is I am from Atlanta and I was born and raised in Atlanta. I grew up in southwest Atlanta upper middle class community and I choose to live in my community. I could go live somewhere else, but I choose to live in my community and so has many many other people. I don't feel that that should be looked at as negative or even if a white person wants to live in a community or Asian or Latino, I just don't feel like racial concentration as long as it is not poverty is a bad thing as long as people have equal opportunity to resources. Dr. King.

Comment 139: Percy Sledge who died the other day was going to move to Macon where he was recording. They burned his house down before he could move in. Obviously, didn't choose to live in Macon. I think we are passed those days. I think Percy Sledge these days would be welcomed in Macon. I think we are past that. I am not saying we are perfect. We are passed burning down houses. I am not saying discrimination is gone. It will never be gone in Macon, but at least we are past the day where somebody famous is going to have their housing burned down.

Comment 140: I think it is poverty concentration that is the issue.

Comment 141: I think so you have identified many challenges, but when you are receiving Federal Financial Assistance the idea is when you are building and when you are creating housing opportunities are you looking beyond the areas of minority concentration. The challenge that I have heard is well can we afford to do that and we have these limitations based on the QAP and so balancing those variables and I know that it is tough, but from the FHEO perspective and Rob you can chime in. You are certifying that you are Affirmatively Furthering

Fair Housing and that means you are taking actually steps to help create greater access to community resources and to houses in areas that are not minority concentrated. So you can, can you show that you are taking those affirmative steps? Then when you sign those certification and they are actually legitimate and it is not a situation in Westchester County where a decade or two before there wasn't these concentrated areas, but then there is this influx of federal funds and then you have these concentrated areas and so that and there is oversight if you are going to receive the funds. You have to have oversight, but they are saying for us it is quid pro quo. We give you this and you give us this back. So what is your affirmative step? Can you demonstrate due diligence? Your affirmative step is to spread the wealth so to speak. I don't really think and I don't know. My dealings with FHEO, I don't think they are considering a lot of the challenges that you have raised. I think it is sort of blinders and then it is for us to navigate that within the perimeters of here is what we are working with programmatically, financially, and still meeting our due diligent requirements with FHEO. What do you think Rob?

Rob Gaudin: I think you are right on the money there. Very well stated.

Comment 142: We have a single family program. We have a single family program where we have tried to target areas in North DeKalb County and then keeps the rents very affordable so that families can move in there. I guess that is just one house at a time. It has been very successful, but now that the market...

Comment 143: You need economics of scale.

Comment 144: Yes, one house here and one house there. How do we do it on a large-scale? We want to build in North DeKalb. We want to be in these areas, but I don't have 25 million dollars to build something. We definitely do. We definitely look. We have a map. We have done a study. We are here in South DeKalb and these are the areas that we are trying to get to. We look at it all the time. We can just never get to that. We would like to though or do you look at it from a standpoint like the Atlanta Housing Authority. They tore down all of their public housing in downtown Atlanta and that just gentrified the whole neighborhood. So what used to be a low poverty area is now a thriving area, because they turned their public housing into redevelopment. So I don't know.

Comment 145: Where is that population that was in the public housing?

Comment 146: You have a significant amount. They have public housing and you have project based.

Comment 147: You have mixed income. We do have and we don't exceed 40 percent of the units that are public housing assisted, but like Centennial Place which was the original HOPE 60 and the first one closed in the country. They replace Techwood Homes which was the first public housing in the country. Of course that is a mixed income, mixed finance community. Forty percent of the units are for public housing eligible residents, but it is all seamless. When we tore down and demolished Bankhead and all of these that are really have grown in mythic proportions are far as what is wrong with public housing, those families were issues Housing Choice Vouchers and they were also given property to move into vacant units that occurred in some of these mixed income and mixed financed communities. We also develop project based rental assistance housing which is our own PBRA program which allows for site based administration and so forth by the owner. We have created other housing opportunities to

replace the public housing. So we didn't do nor was it I think what was interesting was when we first started demolishing public housing some of the surrounding county said that 500,000 low-income families. There were never 500,000 low-income families. It is all execrated, Fayette County, DeKalb County, Clayton County, but we have tried to promote different types of housing opportunities. That is the reason we have a payment standard that is much higher.

Comment 148: The emphasis is sometimes on the word voucher. Maybe the emphasis should be on the word choice.

Comment 149: Certainly if you are saying housing choice.

Comment 150: If it is Housing Choice Voucher, let's not forget the word choice.

Comment 151: Where people choose.

Comment 152: Playing Devil's advocate with the national origin as protected class and you described ethnic groups deciding to reside in those communities. Is there language barrier there? Do we have limited English proficiency populations that feel that they can't go beyond those community boundaries because of the language barrier?

Comment 153: Absolutely.

Comment 154: That is a big deal. So that would trigger a concern here.

Comment 155: When we relocated our families from Toby Grant, large and small populations we made sure we had people from the community there that could help our families understand from the Somalian community outside of Toby Grant. We also brought in interpreters and we made sure that we took them to areas of deconcentration and other areas. The steps that we made sure in our plan, we took. Do families still tend to congregate together? Yes. It is a comfort and I see what you are saying. It is Limited English Proficiency, but it is more than just the Housing Authority then our have to work with schools and the government itself.

Comment 156: We have to figure out a way to do it.

(Presentation)

APPENDIX D. MINUTES FROM THE SECOND FAIR HOUSING FOCUS GROUP

Comment 1: The question is the display of the data and then in the background is, are you going someplace with this? Are you painting a particular picture or are we just looking at the display of the data, because if you are going someplace with this than the question is the model talks about financing. I currently don't see the model putting on display cultural practices, the involvement of government, leadership and those kinds of factors I don't see on your display. My questions I am kind of hesitating to see are they going to be data that reflects cultural impact points, because currently your data points to a reference point called financing. So let me pose the question. Did the model not include any cultural reference points by design or the remedies point to remedies can be done more in the area of financing and the reps want too much of our qualitative data.

Rob Gaudin: This particular data resource has no information about the individual applicant except largely these, say for one thing and this is the entire state, here is the income. What we can see here while whites are roughly half as likely to get denied when you talk about households making \$75,000 or more now blacks are three times as likely to get denied. The Federal Reserve goes on to explain why you can't say that our lenders are being discriminatory and they have a lot of stuff to say about the. I am not entirely sure if that is necessarily the case.

(Presentation)

Comment 2: When I look at the information it sort of says this is not news to me. I am glad to see it in some form of official data, but it is not news. When I look at it and I hear it, I want to know what is going to be done about it. That is where I am.

Comment 3: How many more slides do you have?

Rob Gaudin: On finance?

Comment 4: No, in this presentation?

Rob Gaudin: Forty-four slides.

Comment 5: And we are at number?

Rob Gaudin: Thirty.

Comment 6: Wouldn't the proportions be more disproportionate is you went from 2009 to 2013? You initial slide showed that prior to 2009 the rates were closer, but after 2009 the rates really became disproportional. So isn't it actually worse now if you look at this data from 2009 to 2013.

Rob Gaudin: No it is actually not. I will go backwards a couple here.

(Presentation)

Comment 7: Wasn't that peak time the fraudulent time?

Rob Gaudin: The peak times were 5 and 6.

Comment 8: 2009 was like the crash year.

Rob Gaudin: That was the peak 2005 and 2006.

(Presentation)

Comment 9: Do you have a slide on the breakdown of the banks that are denying?

Rob Gaudin: I do not have that slide.

Comment 10: But that information is available?

Rob Gaudin: That is available and I can tell you which lenders and which type of housing or dwelling they are lending on.

(Presentation)

Comment 11: Manufactured what?

Rob Gaudin: Manufactured houses. Not mobile homes, because they are on a permanent foundation.

(Presentation)

Comment 12: Have you done any assessment on what kind of testing is being done in Georgia?

Rob Gaudin: I haven't done that yet. There are some concerns I have about some agencies in Georgia and we will get to that shortly. Testing information as a category is hard to get even from an organization that does testing, because they do not want to share it and often it is confidential.

Comment 13: How many organizations in Georgia do testing, like none.

Rob Gaudin: I would not say none. HUD does no testing. They try to conciliate. Many times when you take something to litigation it is this individual who has tested and that goes to court. Testing is expensive, but can I return to that in a few minutes?

Comment 14: Sure.

(Presentation)

Comment 15: Could we talk about that for a minute; I am not sure why that is?

Rob Gaudin: Actually, I am really positive on why that is. It is three slides from now.

Comment 16: OK, good.

(Presentation)

Comment 17: Can you go back to that last slide for one moment?

Rob Gaudin: Certainty. If your email address is on the sign in sheet I will be happen to send you this.

(Presentation)

Comment 18: Actually, we had a MOU with HUD and a lot of that was before I started so I am not too familiar with that, but currently with that we no longer have the MOU. So we no longer get that huge influx of cases coming over to us. So now we just rely on our own education and outreach and our own walk-ins. That is kind of why the number has dwindled.

Rob Gaudin: Now are you still Substantially Equivalent?

Comment 19: We are still Substantially Equivalent. We have to continuously investigate under our own Georgia Fair Housing Law statute.

Rob Gaudin: Do you expect the complaints to get back to here this year?

Comment 20: This year?

Rob Gaudin: 2015.

Comment 21: It is definitely a little more. We are in the process of getting recertified. We will probably get back to that number once we get the recertification established.

Rob Gaudin: So you are not Substantially Equivalent now?

Comment 22: We are.

Rob Gaudin: What is the difference of the certification?

Comment 23: Substantially Equivalent just means that our statute is substantially equivalent to the Fair Housing Act. So regardless of having the recertification, our statute is still substantially equivalent to the Fair Housing Act and we are still investigating the same way. That recertification just helps us to get more cases. A lot of people go to HUD first to file their complaint before they would come to us. That is why they have a lot more cases than we do.

Rob Gaudin: So for over this period you had this memorandum of understanding which is never mind John Q. public, go somewhere else. I guess because they can go to HUD, but if you are the state equivalent then HUD sends the complaint back to you and you couldn't follow up on it?

Comment 24: No, Ok when we had the MOU HUD would send us maybe 100 or 200 cases over and we would investigate them and everything, you know was fine. Once we no longer had the MOU they no longer sent any cases to us and so we only rely on when people walk in.

Rob Gaudin: This says you only had six complaints come in your office or seen. This is your data, or your agency's data. This is how many complaints were on record. We sent the letter to your agency, your director, or somebody like that and this is the information we got back. So this is information which I am basing my decisions on. So then is this not an accurate record?

Comment 25: I wasn't there in 2011 so, I really can't say but if that is what they sent, because we have a database that we keep everything in so it is probably what happened.

Rob Gaudin: So during this period, the public would it be fair to say that the public is not being served as well as they used to be?

Comment 26: I think...

Comment 27: I think the majority by the state agency.

Rob Gaudin: The state agency.

Comment 28: You could go to HUD and get a more accurate number of complaints that are filed in Georgia, because they are going to go to them first because they feel they the federal agency that has more power.

Rob Gaudin: Here are the federal complaints and they drop off 150 the first year you have your MOU. So somebody is losing out here and I think it is John Q. Public if they need to move forward with a housing complaint. I mean you guys went from 300 or whatever or 185 to 258 down to six and HUD went from 258 to they lose 150. So trying to advise all of you on how this AI is done. It just seems like a piece of the puzzle went away.

Comment 29: Let me just say that is also complaints that are closed. A lot of time complaints...

Comment 30: That is my question. Are all of those just complaints or are they still open like when I did the audit the housing we did complaints and we would open them on a certain date and we had about so many days to close them. So is that and you wanted the number of complaints period that came into the office or the number of closed complaints?

Comment 31: That is another number. The system, that system is only going to be complaints that were closed and a lot of time complaints get to a point where the complainant would want to withdraw or they just won't answer any more.

Rob Gaudin: I am pretty sure whether it is open or close it is the same this year as it was this year because that is the data I have.

Comment 32: I guess I was thinking when you said complaints on your data that that meant filed complaints. Are you saying now that those are closed?

Rob Gaudin: I am not saying. I do believe that HUD data includes open, because we asked them for the status of the complaint. Typically we give those which are conciliated, those which are closed for administrative purposes and we have that data with all the HUD information. Regardless of whether they are open or closed they are going to be one or the other.

Comment 33: There is a big difference in those numbers because a lot of complaints are filed and not all are resolved. They are resolved in many different ways.

Comment 34: Right.

Rob Gaudin: All of them are those which are filed. They could be open or closed. That is what is going on here. Why did we change from 185 to 6? I think it is a smoke screen to say oh those are closed and there are others that are open. It is the same dataset. My belief is that these are mostly closed and there are some that are open, but why is the drop off so small? Typically when that happens there is a certain amount of access issues to the complaint system. Somebody has a problem and there is nowhere to proceed to so actually I would like to get a copy of the MOU to see what kind of barriers your agency ran into at this time. They really

didn't go away. This is the data that they provided. Even if these are closed cases why did they suddenly go or closed and open why did they go from here to here?

Comment 35: My experience in doing these cases during that time period is when HUD stopped and ended its relationship with the state agency. The state agency was at dreck. Then HUD started doing all the enforcement in the state where before you essentially had two agencies doing the enforcement and after 2010 you really lost half of that enforcement capability. No offense to your agency, but they weren't able to do it.

Rob Gaudin: ...Substantially Equivalent that HUD would turn the complaint over to you to get investigated. You don't have two.

Comment 36: No they don't. They don't send anything to us anymore.

Comment 37: But prior to the break, HUD would refer and in my experience we saw them refer mainly private landlord/tenant cases and then they would keep the subsidized housing.

Rob Gaudin: That is their prerogative. They can do that.

Comment 38: Right and that is what we saw them doing. They weren't referring everything to the state agency. So when the state agency left you really lost people who were...

Rob Gaudin: Left?

Comment 39: When they ended their relationship with HUD.

Rob Gaudin: I guess I have to resolve whether we have Substantially Equivalent Status during this period.

Comment 40: I think you are not getting the substantial equivalent. With Substantially Equivalent, all I am saying is that our acts are Substantially Equivalent. The law is Substantially Equivalent. Once we lost the MOU they were no longer, the complaint itself was no longer dually filed.

Rob Gaudin: Then you don't have Substantially Equivalent Status with HUD.

Comment 41: With the agency.

Comment 42: Correct, but our act, the law is.

Comment 43: The law is.

Rob Gaudin: The classification of Substantially Equivalent means that you are enforcing the same way that they would be if you were to hand them the complaints and that didn't happen. For whatever reason, I don't know what the reason is, but we have a hole in the system here. Any questions about that, as clear as mud as that is?

Comment 44: I think it is very clear the details really don't matter as much because even if you say that one, than one agency was handling the complaints it still just says that some, as you said, the public has suffered even if HUD is handling them all now it is impossible to believe that it went down to six complaints. The lowest it has gone is 97, which is still a substantial difference but the clarity is someone has suffered. The clarity is the same people have suffered that have always suffered and they are suffering according to those numbers because they are

not being seen to say the least this report indicated to the naked eye we have had the opportunity to explain the situation, but to the naked eye there are no more complaints, but they are somewhere, but according to this information we have done a excellent job since there are no more complaints.

Rob Gaudin: This says to me that from here to here there is an access problem. The doors are closed. That is what it says to me so we need to open those doors. Maybe they are now open in 2015.

Comment 45: A large reason for the differential difference between the entitlement and the non-entitlement is many of the entitlement communities have Substantially Equivalent laws and like Savannah and I believe Columbus actually have some city money that goes into education. Outside of those entitlement communities you don't have outreach. You don't have fair housing knowledge. You have that in Atlanta area, because the only HUD funded agency is Metro Fair Housing and they do a great job there, but outside of that when you get to the non-entitlement part of Georgia and particularly towards the south and the north, you don't have fair housing outreach and if you don't have the outreach you are not going to have people file a complaint.

Rob Gaudin: Correct. So a huge portion of the population there is not being served.

Comment 46: Not being served at all. We at Legal Services do our best to help the individual clients we see. It is just we are not funded to do outreach and we do somethings. We do somethings for the city and communities, but there are a lot of people out there and when we go and talk about fair housing in rural Georgia, the fact is it is very enlightening for them. So you are not going to get complaints because tenants, which are not self-identified and a lot of the landlords don't even know that they are doing anything wrong.

Comment 47: Even when you speak about outreach even when you don't consider rural areas, if you consider the city if someone doesn't facilitate the outreach. Not that the organization offers outreach, but still general public doesn't even know that that exists. So, if someone doesn't say hey, could you guys come over to this community and put out some information. The average person doesn't know that that information is available for them. They don't know that that information can be explained to them that there is a helping hand considered outreach. So when we say outreach, does that mean that someone actively goes out into communities, sets up a table and says we are here to give out information or does outreach mean I am here at my desk available and I will come if you call and ask?

Comment 48: I know which one is more effective of the two that you described and that is being out in the communities.

Comment 49: So even if you say we have an outreach department there is someone actually reaching out?

Comment 50: It is true. People are and my experience with tenants particularly because that is what we focus on is they don't even realize that what they are experiencing is discrimination a lot of times. So they are not going to file HUD a complaint because they just feel like it is not fair and they don't know that it is not right and that they have a right to be free from that behavior.

Comment 51: It seems like those are more in line with maybe cases that are closed. Those are not the total complaints at all.

Rob Gaudin: I can send another letter ask for more complaints or another set.

Comment 52: What is your agency again? I'm sorry.

Comment 53: Georgia Commission on Equal Opportunity.

Rob Gaudin: Yes it is this agency. When we sent the letter requesting complaint data this was the data that they sent us. So if there are more complaints then we have an incomplete dataset.

Comment 54: Do you all serve the entire state or is it just...

Comment 55: Yes.

Comment 56: Do you have a breakdown by the rural complaints verses?

Rob Gaudin: We have asked for it, but I do not know if we have it.

Comment 57: I have seen that HUD does break down the data by county.

Rob Gaudin: And city which is how we were able to do HUDs data by entitlement and non-entitlement. So I will revisit this with your agency. Can I talk to you for a few minutes after this?

Comment 58: Yes.

Rob Gaudin: That would be great. I do want the correct data so that people can interpret it correctly.

(Presentation)

Comment 59: Could you go back to the previous slide, please and explain what other roles is? They have more than the banking and the applicants.

Rob Gaudin: There is a huge list and this is just the ones that were checked. I deleted the ones that had no observations. Other is the one where you can type something in.

(Presentation)

Comment 60: Have you distributed this to providers? The big issue we are seeing in disability advocacy is personal care homes and smaller homes for people with disabilities zoned out of suburban communities or any community. The Commissioner for the Department of Health is going around trying to convince municipalities not to do that. Do you distribute it to those?

Rob Gaudin: We have another category here, other. This are no responses. The intent for the survey was for DCA to send it out. I think we are getting ready to do that. Is that correct? That hasn't happened yet.

(Presentation)

Comment 61: Disability is not on here.

Rob Gaudin: Yes they are it is just minuscule. It is right here.

Comment 62: OK. We definitely want disabilities on there.

Comment 63: My question is the amount of concentrations on the data the amount concentrated on the instruments and the amount of concentration on the collection and the assumptions that have been made. A lot of it based on the financial data and the financing of loans and what is happening with predatory lending. The other slide you had up goes more to qualitative analysis.

Rob Gaudin: That is correct.

Comment 64: So my question is how much has been done to put together reliable qualitative instruments as well as training people to do the survey and getting people to participate; training people to collect that kind of qualitative data for one; and two getting people to participate in that kind of conversation? Where those two reference points analyzed terms and the cost for that kind of delivery?

Rob Gaudin: Right now and this actually has not been distributed. It will soon be distributed and in all 15 states that I have worked in and all the local units of government that my firm has worked in we use largely the same survey instrument. Some geographic areas we change a few questions and add a few things, but essentially it is the same. We can expect what to get. It is fundamentally a stakeholders' survey. You need to understand some things about the housing industry to address this. If we have John Q. Public start to participate that is great. I am real good with that, but it is really about measuring what the stake holders understand about fair housing in this. This question asked how many protected classes are there. For example race and disability, how many others can you name. We measure what our stake holders understand about fair housing and then we say will the stakeholders seem to have short fall. They are limited and what about John Q. Public? John Q. Public understands a lot less than our stakeholders so it gives us an idea how to outreach to our citizens both as consumers and providers. That is what this measures and the actions that we take and subsequent to this is the outreach to the general public and the general providers to housing. Yes Ma'am?

Comment 65: One more follow up. Do you have a sense of the breakdown of the stakeholders? What percentage are non-profit organizations? What percentages are for-profit and what percentage are government stakeholders?

Rob Gaudin: None yet. This would tell us, but with 16 or 20 nothing yet.

Comment 66: In your experience is the stakeholders more non-profit and government than they are private or more private that there are government?

Rob Gaudin: It depends a little bit on who participates in distributing it. If for example the State Housing Authority is connected with many private sector developers and they send it out then the survey is populated with a lot of private developers. If it is only an agency connected to the general fund and they distribute it then it is more government and advocates and so on. You need to make sure that the distributing of the survey comes from a variety of agencies.

Comment 67: Can I speak to that Rob?

Rob Gaudin: Please.

Comment 68: Thank you. So we have and we have gotten from HUD a list of all of the email contacts for the Housing Authorities and when we do our mass email we will be sending to all of the Public Housing Authorities. We also have Constant Contact that is huge with thousands of emails for local governments and grantees that we have so we will be sending it to them as well. We have a disability advocacy group that we will be sending it to and NSP, CDBG, HOPWA and ESG; do you know what those acronyms mean?

Comment 69: Yes.

Comment 70: For the federal funds which is HOME, CDBG, and HOPWA and NSP. The state has a constant contact list for everybody who we are considered to be our stakeholders. So for all of those persons who are on this list you will get this mass email with this is the link to our survey and if you want to find the survey it is on the DCA website and she is about to pull it up, but underneath Rob's survey for the actual stakeholders we also did a survey. A neighborhood survey.

Comment 71: On our main page we have a revolving set of images so there is a fair housing image that just went live for Fair Housing Month and there is this language that is here where you can access the Fair Housing Survey. There is a Citizen Participation Survey which is for John Q. Public then the actual Stakeholders Survey. You also have an opportunity to see this in the Spanish language. There is also a PSA if someone is not familiar with fair housing regulations they can go on if they have the time and get the idea of the requirements under the Fair Housing Act. So, we welcome that you encourage individuals to either go on the main page. I can send the link, but as I said before you are on our main page, which is this. You will see the second image is celebrating National Fair Housing Month and then there is this language. If you could just put the word out and we can send you the Fair Housing Survey; if we have your contact information and just so you know we could send you that link to get access to it. We also have a DCA a fair housing page. If you click on this icon it will take you to and you can go through our language access resources and the accommodation policies types of communication. I am not sure if you are all familiar.

Comment 72: How long has this been up?

Comment 73: Since 2013.

Comment 74: OK.

Comment 75: The fair housing page. This was created this month. This for this survey, but what I just showed you this icon takes you to our fair housing page. Any questions on that?

Comment 76: Has the survey been run though the accessibility checkers?

Comment 77: So he was very involved in this process but I will verify that.

Comment 78: I think that and first of all let me say that I am a representative of the community. So whoever had the idea to invite us that was a very good idea? I think that just to say the public, I am going to say that a person that receives Section 8 or participates in the Housing Authority, maybe would not have reason to go to this website or consider the survey, but I think it may be helpful if there is some incentive or requirement. Say when you renew your contract annually that you must go and take the survey. It is a form of education for them and they will do it because it is a requirement, but it is also a method of outreach saying here is

how we can educate you. They don't have to lease home. They can do it at their leisure, but in a time frame. It is a way to give them information that they just would not normally have. I think that the more people that have the information I think that the better off everyone would be. If a landlord knew that most tenants know their rights then the landlords would be more active to do what they are supposed to do from the beginning, because they know that more people know what is supposed to be done. They have the idea that they don't know and they don't know how to get to complaint then they can continue to do what may not be right.

Comment 79: To go off of that what further requirements would landlords under the voucher program or getting that rental assistance through DCA go through fair housing training or receive some sort of information on that?

Comment 80: There is information.

Comment 81: I don't think it is a requirement on the owner's part or the owner's agent part, but they are supposed to have that fair housing information to the client, correct?

Comment 82: So let me just back up a little in terms of the regulations. So the actual recipient, we are, the landlords aren't responsible for let's say an accommodation request. They are not responsible for the cost. What new do is we had a voluntary compliance agreement? The Rental Assistance Division of DCA is often times with HUD not we closed that essentially under that voluntary compliance agreement we modify the landlord certification form in which we talked about assistance and procedures and reasonable accommodations. For our tenants we provide to them was a reasonable accommodation, notice of our voluntary compliance agreement, our reasonable accommodation policy where we discussed grievance, but they have the right to request an accommodation, but we would then contact their landlord to discuss whether their accommodation should be granted. If they needed a verification to that disability and the next request. Then the next step would be granting that. We have had some areas where the landlords have refused and we have worked through that process of educating them. Over all the landlords have an education process for the Housing Choice Vouchers, there is no mandate for that. I hope that answers your question.

Comment 83: Is that something that DCA could implement?

Comment 84: So, I know that we had in our rental assistance division we had staff from GCAD present on domestic violence issues. So if you are willing to do outreach then we will coordinate with you and partnered with you to get that information out. We could probably get PHAs to the table and not just DCA, but areas that we do not cover. We could get PHAs to the table and you could have a presentation on fair housing responsibilities. We could also probably get you in with landlords. It is tough to get private landlords. We could probably get the PHAs because we partner with them. We would welcome the opportunity to discuss any options.

Comment 85: I would be happy to do that. I just think that the landlords are benefiting from this and the tenants have a lot of obligations placed upon them and it seems fair that they landlords should also be required to take certain steps in order to benefit from the program which they do.

Comment 86: If the tenant is a Housing Choice Voucher participant that is connected to the department and they have raised an accommodation issue which goes into your department. That is not ignored. That is automatically considered by us.

Comment 87: I think his question is more broader than just the RA issue. It is the whole, all the protected classes and the right to be free from discrimination. So just general information provided to the landlords when they initiate their relationship to the department.

Comment 88: So let me just correct that. I am speaking accommodation, but I am not only speaking about disability. I am speaking as language access issues, if there is something discriminatory as it relates to race. Those issues are raised and then that goes into consideration with the department. It is not just a disability issue. Do we have an actual organized effort to go and educate the landlords?

Comment 89: So you don't supply the landlords who participate with any fair housing information at the time that they enter into their relationship?

Comment 90: No.

Comment 91: The only thing that I have seen is the Landlord Certification which talks about pet policies, assisted animals, reasonable accommodation.

(Inaudible)

Comment 92: I don't believe so, but I don't have and there is a briefing from where there is a check list of documents that are provided. I know it is provided to the tenant.

Comment 93: To the tenant, but not the landlord.

Comment 94: I don't believe it is provided to the landlord.

Comment 95: I think one of the challenges in terms of mandating a lot of requirements for landlords is there is already and I think there is already a deficiency in the number of landlords that are willing to participate in the program. I think you might run into a challenge if you start mandating, because a lot of them are going to be individual private landlords. So if you are talking about John Q. Landlord and he is renting to one participant and then you are going to layer on all of these other mandatory requirements you might end up increasing the scarcity of available housing.

Comment 96: So as other impediments if you have a limited number of people who are willing to be landlords for these voucher programs, isn't that an impediment to fair housing? Because then you have limited communities where these resources are available. So incentivizing more landlord participation in communities that might have better school districts or other opportunities wouldn't that be something that the agency could do?

Comment 97: We do do outreach to landlords, but I think what I was trying to address is you are trying to do outreach at the same time. You are talking about putting more requirements on landlords you might end up with the opposite effect.

Comment 98: If you and I don't know what is in the agreement, when you enter into a Housing Choice Voucher, but even in the agreement you could require the landlords to review this information and to be knowledgeable of this information and sign off that they got this information. As well as the tenant has to sign off that they have been educated on what their responsibilities are in receiving that subsidy. So even that is something simple that we could start now with the management companies which they don't do.

Comment 99: How many when you give folks information's about reasonable accommodation? How many folks are initiate accommodation requests would you say?

Comment 100: I don't know the numbers.

Comment 101: We are keeping track.

Comment 102: It is not a lot.

Comment 103: You are taking requests, but I am sure that it is not a lot through audits, but it is not a whole lot.

Rob Gaudin: Yes ma'am.

Comment 104: You mentioned that in the survey process you expect the answers that you are going to get because of the instrument that you use is a yes, no. it is already sort of like predetermined answers. A couple of the neighborhoods, to extract the language of these communities it is not a yes or no or 1, 2, 3. It is almost like could the survey be in a way they could write it out in almost like an essay form what their issue are?

Rob Gaudin: For those questions that say yes, no, and I don't know there is a box that you can write an answer in for everyone. So we tabulate yes and no, because it is easy, but we also release a set of tables that have all of the comments. You can read them yourself. They will be in the appendix to the document. We also go through that connect those similar themes into a thread which we put into the main body of the document.

Comment 105: I know we are having a lot of conversations about assent and then there is the next conversation called have you considered compliance or an impact strategy. In doing so does there are not enough resources to go around or even cover the cost of doing something so expensive. So are you already considering a collaborative model and has there been any preliminary language put in place for a collaborative model for remedies after the data has already been collected?

Rob Gaudin: My role is to identify these impediments and make recommendations. Then we talk about those recommendations and how they will work for DCA. It is appropriate to form partnerships then you can get a lot more done with fewer resources. So that is the idea. We are not there yet, but we are in the collecting the data part.

Comment 106: With respect to DCA we have 12 planning organizations throughout the state, right? Are we considering those planning organizations for partnership or are we just going to go directly to the providers and landlords? The reason why I am asking is because in the first public policy is about planning language, like each municipality and county have to submit their planning plan to the state. Then it would be submitted to DCA. So is the planning strategy just as much an access point as the provider strategy?

Comment 107: I not sure that I understand your question.

Rob Gaudin: I am not sure that all the entitlements who prepare an AI, they don't submit them to DCA. They send them to HUD.

Comment 108: Oh, is that what you are asking? Can you speak to that please?

Comment 109: So, as you said they do not send their AI to DCA unless we actually request it, but each jurisdiction has to submit to us their Comprehensive Plan. The Comprehensive Plan may or may not be a part of their Analysis of Impediments and it may or may not be a part of the Comprehensive Plan. So unless the State asks for it specifically, we really don't know what the other impediments or barriers are. So during this process we have been asking. So I have been reaching out to a lot of jurisdictions. Some of them do not have it at all and some of them do and some of them are really old. So, the only thing we can do at this point is add up what we have, go through it, and see what impediments overlap or may not overlap. We are at the look and see right now.

Comment 110: OK.

Comment 111: I was a little bit confused. Were you saying that once he pulls this information together it really doesn't go anywhere?

Comment 112: No, so each jurisdiction if they are an entitlement jurisdiction has to perform an AI. They have to. Their AIs are based upon three to five years depending on what their Consolidated Plan.

Comment 113: AI?

Comment 114: The Analysis of Impediments. Depending on what their Consolidated Plan is. The entitlement jurisdictions that are within the state don't necessarily come to the state unless we actually request it. But each jurisdiction, community, and county has to submit to the state their Comprehensive Plan, which is a little bit different.

Comment 115: You are saying you don't necessarily have to get it what the problems are you just get...

Comment 116: What they are planning.

Rob Gaudin: There are two types of planning systems. One is for the Feds. That is the Consolidated Plan and one is for the State and that is the Comprehensive Plan. That is what I think you all are talking about.

Comment 117: So because this whole system is kind of disconnected, it is not until people are actually like what is up with this jurisdiction. So now we are in this big planning strategy to see how we all align with what is HUD doing and what is the State doing and now we are talking to the jurisdictions and pulling their things together to figure out what they are doing, but before there is only the Comprehensive Plan. So I can only say comprehensively that this jurisdiction is going to do this as far as schools, transits, fair housing or whatever is concerned. So, it is not until we actually request everybody else's Analysis of Impediments that we really can't address what the barriers are. Which is what we are currently doing now?

Rob Gaudin: I will say this. Private sector barrier know no boundaries. They are largely statewide. It is the public sector ones that will change when you pass to another political jurisdiction. That is where I am going to search for differences. The private sector ones, the lending, the housing complaints that is just what goes on in the market place and they are statewide.

Comment 118: Doesn't it seem like a quick fix if there are only 12 jurisdictions in the state that have to submit and AI that you guys get that automatically.

Rob Gaudin: Actually it is the Comprehensive Plan.

Comment 119: Make it a requirement so that that way there is no disconnect. That way you guys are getting them as the Feds are getting them and you are able to access them at a local level. It just seems like that would be a quick fix to the gap of information.

Comment 120: So, first thing you have is the turnover. That is really a major issue.

Comment 121: Turnover?

Comment 122: Turnover with the whole government's period. So whether it is the state or a local government it is just turnover. So it is kind of a 50/50 chance. You may have somebody who actually knows what they are talking about and then you may not and they are like wait a minute. So I am just being honest. So when we are moving through this process, the state now is really trying to do a better job at creating or sustaining the partnerships that we have. So we are reaching out to the local governments, we are reaching out to the regional commissions, we are reaching out to the outreach groups and many of them and I don't know if you know, but the state is separated into 12 regional districts. So with that process in place we are trying to have all of the outreach groups talk to one another, but before they probably really weren't. Now we are in the process of accessing, well how do you communicate this and how many people and groups do you know in this area. So it is kind of like starting over.

Comment 123: At least we are having a conversation.

Comment 124: We are having a conversation.

Comment 125: What kind of "official request" have you made to the advocacy community to get involved with the front end of the requirement and help deliver this communication.

Comment 126: So since we are starting and this is our data. We are just starting so when we send out the Constant Contact list it will be our first standpoint. I have told everybody, listen we want you to copy and paste, we want you to print it out, print it out and mail it back. We need it. We want it. We are asking for it.

Comment 127: Is that published?

Comment 128: Local governments do and they should publish it. They are supposed to, but and trying to get and depending on what some of these things say it may not be posted.

Comment 129: Reliability and discrimination.

Comment 130: What we are finding out though is some of them really don't know that they are.

Comment 131: That is for sure. I just think advocates. I think people with disabilities, people of color are the ones that don't answer the questions of whether they are being discriminated against.

Comment 132: Outside of Rob's survey, but the neighborhood survey we can definitely tweak it. So if you see things that you want to add this or maybe you should have asked that. You can

tell us because we want to know, because we based it on a generalization. There are 159 Counties in the State of Georgia. There is no way that central DCA is going to know what your impediments are unless you tell us. So we need help.

Comment 133: The low-income housing tax credit property managers and owners will they be given this survey also?

Comment 134: Absolutely.

Comment 135: I know this is outside, but are you aware of how much training of the fair housing outreach that that department provides to the management of the low-income housing tax credit? We are seeing increasing issues particularly with low-income housing tax credit funded properties saying that we don't accept vouchers.

Comment 136: They can.

Comment 137: I know they can, but I have a newspaper article for one company in LaGrange that said it to a newspaper reporter.

Comment 138: They can't accept a certain amount, right?

Comment 139: We are not, because they are in the position and LaGrange is an example of what we have seen throughout the state where they want to build the property. The community doesn't want the property; because they hear low-income housing tax credit and they think subsidized housing. You have community protests. This is a case where somebody representing the builder said don't worry we won't be taking vouchers. You are going to have to.

Comment 140: We have seen litigation in Green County around the tax-credit issue. It is really the population and nobody knows.

Comment 141: You have the same issues in the Augusta area with low-income tax credits.

Comment 142: Isn't there a certain amount that they can take. Like they can't take 100 percent. They can take a small amount.

Comment 143: They are not supposed to discriminate against people because they come in with a voucher, which means if everybody on their waiting list has vouchers then they would have to treat them. They can't refuse to rent, because you have a voucher.

Comment 144: So what that is they said to a newspaper that we are going to discriminate.

Comment 145: Exactly.

Comment 146: And then the information is going to come out that there was discrimination and people are going to be surprised, but they have already publicized that we are going to discriminate. We don't want that here.

Comment 147: I think low-income housing tax credits properties are right now are the newest affordable housing being built. They are usually in nicer neighborhoods than some of the existing housing and we are seeing real issues with people trying to access that housing. They saying we don't want vouchers is just code.

Comment 148: Which vouchers are you talking about?

Comment 149: Housing vouchers. Housing Choice Vouchers.

Comment 150: And they require three times the rent to get into the community.

Comment 151: There are real issues with that. In other states there has been litigation around that issue.

Comment 152: So we will check into that. I think ...

Comment 153: It is true. I am telling you it is true. You could call some numbers. I have them.

Comment 154: For low-income housing tax credits?

Comment 155: Yes.

Comment 156: There are huge problems.

Comment 157: I was always under the assumption that if DCA is issuing the tax credit and DCA would say whether or not, could you set some highlights up here saying OK were issuing this tax credit you have to take certain incomes and certain populations? It sounds like the management companies are making up the rules as they go. It is like an industry standard now that the tenant selection plan consists of three times the rent. No criminal and we already know that, but certain things are keeping a certain level of the population out. I work with people with disabilities and so my folks they don't have three times the rent. They have \$710 a month and so they can't rent that tax credit property. That is an issue. So now if I even get them a voucher they can't even go to somewhere that is accessible that is new that is ADA and all set up.

Comment 158: What you aren't considering is the whole relationship with to contract the property management. So when a contracted property management has the accountability for managing the housing it is no longer "public accountability function" and they are clear about that because what it takes to go after a contracted entity and calling a public entity on compliance is a whole different world. So in effect the industry so to speak, has adapted to get around the accountability of the public model and that is to contract it out to property management. The property management makes the argument we could do it cheaper, better, and more efficient, but at the same time the discrimination factors increase the minute it goes to property management. So the question becomes how do we in effect move DCA more toward being in the regulatory business?

Comment 159: So DCA has a compliance unit. So this is a conversation and I am not sure that any of us were aware that they were doing that. That will have to be a conversation that we have, because I am not certain that we knew.

Comment 160: Within your own department.

Comment 161: As a whole.

Comment 162: Connect with her and the compliance group and have them connect.

Comment 163: Particularly in the urban areas. Atlanta, Savannah, Augusta that whole property management phenomena has spread like kudzu and as an entity who takes on peoples

conversation about what they are experiencing from “the management companies” and then if you go to the management company and address it. You begin to consider that they are not the public entity; they are a private entity even though they are getting public funds, so to speak. So in this conversation we want to recommend that at the same time that we are doing the assessment there may be some regulatory recommendations we can move forward. If you look at Rob’s data up there that six and three, six local government and three property management is nine and that is over half, that is over 50 percent the total aggregate number at the bottom which is 16. So that dynamic between government and between public dollars and private property management is where the acts of discrimination occur. We as advocates have been considering the regularity accountability is no longer going to be with DC, it is no longer going to be in HUD. It is going to come back to the states. Are we now in a position in the advocacy community to ask DCA to move more towards a regulatory representative when it comes to property management?

Comment 164: Was that a question or the end of a statement?

Comment 165: It was a question, but they do not have the answers to the dialog.

Comment 166: But we are going to talk about it and try to get an answer.

Comment 167: I just wanted to put on record since it was mentioned already and I do not want to speak for people who are not here. The gentleman mentioned people with criminal backgrounds and I think they should be included in a whole other category of discrimination, because I have spoken to people that say that they have felonies that are 20 or 28 years old and that felony still haunts them. So they are already in the bottom. They are denied the loans and then they just want to move into a different area and they cannot do that either after they have finally got somebody to give them a job. If we never take them out of the, because when they get out of prison they most likely are going back to the same neighborhood. So if we never take them out of the same environment they are just going to return back to the same things that they have done because they don’t have an opportunity to work and they don’t have an opportunity to move. So they will just continue to go back into the system.

Comment 168: I know now there are creating several new programs and this is just me hearing and it is not what our office is doing, but they brought attention to try to rectify this situation with breaking down those barriers of credit checks and felonies. I can give you the information of those programs that they are offering.

Comment 169: So the DCA partners with and is part of the Georgia’s Re-Entry Program. So that is what we are specifically targeting.

(Inaudible)

Comment 170: We are targeting returning citizens at DCA.

Comment 171: That is exactly what I am saying. So we do need and we have done outreach. They have hired housing counselors as part of their outreach efforts. DCA is a partner in terms of trying to remove those barriers as well.

Comment 172: And modify eligibility requirements in our Housing Choice Voucher Program as part of this too. Now we are only tracking mandated HUD requirements.

Comment 173: So that would be sex offender registry.

Comment 174: Lifetime registers and methamphetamine on federally assisted housing.

Comment 175: Are there any returning citizens actually on that panel as well.

Comment 176: Not from DCA, but I don't know we have several groups that are partners.

Comment 177: They actually have housing counselors in the jails and prisons and we have representatives to help with those.

Comment 178: I pulled it up and they are allowed any convictions. They are allowed felony convictions...

Comment 179: What program is that?

Comment 180: The Open Doors Program.

Comment 181: As well as they are allowing non-violent felony conviction one-plus year old and felony convictions, general felony conviction five-plus years old. They are several different programs that are that the person they can file under.

Comment 182: I did have and I mentioned early about the LAP and the language access and I was just wondering when he was speaking about compliance and specifically about the PHAs. I know it is a little more difficult when you have private landlords that are also in it, but one of the things that is concerning when you think about language access. A lot of the times when I have gone to a Public Housing Authority or we have had issues and we review for other access to justice or access to housing the a CoP and other planning tools. I have never run across a PHA that has a Language Access Plan. To specifically have a written comprehensive policy that their employees and everyone else will know that they can follow to ensure that they are affirming that access to fair housing. I was just wondering if there was any analysis or what the DCA might be able to do in terms of training or working with your PHAs to encourage them as a part of their planning and when they are reviewing their a CoPs. To actually have written language access to plan to address those types of issues and understanding the provision of language services, interpretation, translation, not using family or friends, certainly not using children, stressing the importance of having qualified interpreters. The fact that someone is merely bilingual does not qualify them to serve as an interpreter. Just those types of concerns and if there had been any discussion about that at all.

Comment 183: I do know that in our outreach when we are partnering with PHAs and I mean dialog across the board that we do have a Language Access Plan. We say go there and take a look and model your polices based on our fair housing documents.

Comment 184: Is that the DCA Language Access Plan or is that HUDs Language Access Plan?

Comment 185: It is mine. We have an effective communication policy; we have a Language Access Plan. I was showing that link on the fair housing page and when we have those conversations we are always referring people to our fair housing page so they can find that.

Comment 186: The Housing Authority is required to have a LAP plan. HUD sent out guidance on that. They have to do a four step or is it a three step?

Comment 187: It is a four step.

Comment 188: Process.

Comment 189: They have the four step analysis that comes from the DOJ guide and let's hope they have done that, but in terms of and a lot of times in our experiences we have just seen faces and speaking with other attorneys around the state. When we speak about the issues I have never been able to get a copy of it and say yes this is our Language Access Plan. They do have a protocol or practice that they follow in the office and likely what you are sharing is that they have reviewed for example the HUD Access Plan, DCA Access Plan, but I have never seen a policy so to speak. Are they able to hand me a copy of their a CoP?

Comment 190: It should be in their a CoP.

Comment 191: We will separate from that. A lot of times HUD has encouraged that they have a separate document and not just what you have in the a CoP. Which is helpful and you should certainly include it there, but to have a separate document in addition to the a CoP especially for those areas that have a critical mass of households that speak a language other than English. I think you would probably see if you populated it on a map not only in your mentor area, but when you go more towards the south. When you go south with all of the migratory workers and all of that you may see and we tend to see kind of hot spots there where issues may be and similar to other issues. A lot of our clients they don't know that they are being discriminated against and they don't know that it is even an issue that the lease wasn't translated and their 12 year old child had to be the mediatory when they went in for their informal hearing so to speak. So they just don't know. So they wouldn't know to one raise it and get in contact with Georgia Legal Services and say hey, I have this issue.

APPENDIX E. MINUTES FROM THE THIRD FAIR HOUSING FOCUS GROUP

Comment 1: Did you create the survey that is on DCA's website?

Rob Gaudin: One of the two surveys.

(Presentation)

Comment 2: Can I just say that for familial status that is just referring households that have children that are 18 years or younger.

Comment 3: Children under 18?

Comment 4: Yes.

(Presentation)

Comment 5: Meet those check marks that would increase the state's ability to meet inclusive neighborhoods, reduced housing concentrated poverty.

Comment 6: I was going to add to that. It seems like it is almost one-sided a bit. You mentioned that if you live in a poor neighborhood or a neighborhood that has minimal resources, then we should create transportation so we could go in a sense to better neighborhoods. That is what you said, correct?

Rob Gaudin: That is right. That is the long and short of it.

Comment 7: I think and when I look at that and let's say you do get money to develop a low-income housing tax-credit in a "better neighborhood" or less poverty neighborhood, is the services out there or are the services too expensive out there, meaning you pay for them and they are not free. Do you create a system from there to come back to neighborhoods that are poor and have free services in it? I am just kind of...

Rob Gaudin: It is a one-way street.

Comment 8: It is like one-way still doesn't affect the better neighborhoods in the sense that we are seeing nothing for them to want to make their neighborhoods different to attract people from poor neighborhoods to come out there. It is all a ways of trying to get the poor people out to the other neighborhoods versus doing it where they are.

Rob Gaudin: I am not saying it is a good decision.

Comment 9: It is harder to survive without the transportation if you are out in a rural community than you have to have a car. That is a big expense.

Comment 10: (Inaudible) get grant funds to set up the transportation system the government would have to subsidize and with this last estimate \$350 million dollars a year. That is not in their budget. So the only thing that we have is on call, because we are a rural area, a great program to do an on call so we get penalized.

Rob Gaudin: One of the most vocal groups to this proposed rule were PHAs. They found that they would need to support a school system. Wait a minute I am a houser, I am not an

educator. That is why I think partly why they have an issue, some conclusions, but the upshot is instead of doing any proposed rules we are still operating under the 1996 Fair Housing Planning Guide even though in June this might change.

Comment 11: If Texas is decided in a way that disparate treatment is no longer consider a valid theory of discrimination then will we take out a policy analysis from the AI?

Rob Gaudin: Probably not because the GAO reports still is true. Some people practice the proposed rule and some people do not.

Comment 12: (Inaudible) disparate impact, can you define that for the group?

Comment 13: I wish I could so easily.

Rob Gaudin: The impact on any decision is heavier on certain groups. It has more effect on certain groups than on others. In this case it would be those groups which are protected under fair housing law.

Comment 14: Disparate treatments can be either intention or unintentional. Sometimes we see it, for example I reviewed a recent County AI that said that the county requires double fire walls if it is going to be a home that holds one person with a disability. It is going to be like a two person home. I guess it is called host homes now, but they didn't require that of other people. So it increased the cost of those with disabilities to have a home in order to meet that permitting requirement. The county meant it to be parochially protective, but it ended up being discriminatory and that would be an example of disparate treatment. I think if that makes it simple, maybe not.

Comment 15: It is not simple, but disparate treatment is the unintentional piece of it. It creates this need if you really want to tow the line of everything has to be exactly the same. If you veer in any direction or another you have that chance of unintentional discriminating against someone. That is a very difficult way to run any organization. Based on from our perspective as a lender, the whole thing with HUD and disparate impact and it is going through the supports now was never written to punish someone who and like you said that didn't plan to discriminate. So and then people are actually looking at being fined and so forth and there was no intention of discrimination in their policy. So that in my opinion is almost an impediment to fair housing, because it is hard and you are trying to help a certain group who is in need, but maybe through one of your policies you are actually discriminating against another group, but you are still helping that group, a protected class group for example, but that may discriminate against someone else. It is a very difficult circle to live within sometimes.

(Presentation)

Comment 16: Is this choosing to live in concentrated areas or is this capturing development that were funded by HUD in concentrated areas?

Rob Gaudin: This is the decennial Census. So it is the result of whatever decisions were made and the question is what factors lead to this.

Comment 17: I can tell you Whitfield County, if you notice we are gray up there on the left and it was jobs. We literally had the size of our city population move in in five years.

Comment 18: That is the key to it all. I think people are going to go where they can work.

Comment 19: Now because we lost so many jobs during the recession we are considered an area in crisis. Our median area income dropped \$10,000.

(Inaudible)

Comment 20: It went from overtime to nothing.

Rob Gaudin: I will compare what this gentleman talks about. In one particular state that we have worked in this past year, Hispanics had this level of concentration in one Census tract and that was a very rural area, but they had a massive gambling casino. It was recently built and all of these people migrated.

Comment 21: Immigration always follows economic demand, always.

Rob Gaudin: That is how the market works. How the housing market works for immigrants. This is a rapidly growing population. Never the less this is what HUD is thinking is why did these guys decide to move here. It is not economics in all cases. Maybe you are escaping something from where you came from. A lot of people do that. It is not just Hispanic, but other minorities as well.

(Presentation)

Comment 22: It really seems to have increased on the north side. In the northern part of the state it has seemed to increase.

Rob Gaudin: That is correct.

(Presentation)

Comment 23: They lost them to foreclosure.

Rob Gaudin: I think it is the urban environment. Every, almost everyone had a slight decline in homeownership, but the differences between entitlement and non-entitlement are much more significant than the one or two percentage points lost with giving up homeownership. These are structural differences between the rural and the urban areas.

Comment 24: One thing that I have often questioned when I look at AIs is when we look at vacant housing units and it is amazing to look at the change between 2000 and 2010 with 58 percent of non-entitlement, 128 percent in entitlement areas. Are we looking at vacant housing due to foreclosures and sold ...

Rob Gaudin: I can answer that question. This vacant housing number here in the report you will see the flow through on this, but I do not have the slide that has for sale, for rent, occupied, rented or sold but not yet occupied.

Comment 25: You break it down like that.

Rob Gaudin: Yes.

Comment 26: Good.

Rob Gaudin: Then there is other vacant. That is what you are talking about which is not available to the market place. They are not for sale or for rent. Those went up tremendously

between 2000 and 2010. Tremendously. Some areas it is 150, 170 and it is really a lot. This is a big number 128,000, but other vacant is significantly less, but 2013 and here I am going against what I just said, but 2013 shows a growth in other vacant. So the problem still persists. Yes, foreclosures did contribute to those and people have spectacted and brought housing out and brought it back into the market place, but 2013 it is a rolling average. The collapse of the market is still there and in 2009...

Comment 27: Investors purchased a lot of the vacant property so it went from being occupied by an owner to being vacant or a tenant. HUD said if homeowners wanted to live in the house that if they were to bid then they would get preference. The investors actually bid more than what they had listed as the sale price and the people that wanted to own it just bid want the amount they were requesting. The investors bid more even if it was \$5,000 or more in some cases and they got the property as opposed to the homeowners that were supposed to get preference.

Comment 28: But you are speaking of the HUD foreclosed homes?

Comment 29: Yes.

Comment 30: There is a time frame where an investor cannot bid on a HUD home?

Comment 31: I think there is. I don't know what it is exactly, but there is.

Comment 32: The first 30 days.

Comment 33: You can't consider any offers. Then the 8th or the 15th day it is supposed to be open to first-time homebuyers only. What we have discovered when investigating complaints on the homebuyer priority program, one lending institution is that the agents are taking bids during the first seven days and all bids are being offered on the 8th day and a decision by the owner is being made. In addition all you have to do is insert answer yes I am going to be an owner occupant and there is no assurance that that is a true and there is no enforcement mechanism if that is found to not be true. So what is happening is exactly what she says. Investors are buying up the property and in a lot of cases particularly in the 303 and 10 area code in Atlanta which had the highest foreclosures in the nation; we find that they buy the homes. Investors have bought the homes and they have either decided that it is not worth rehabbing it so they have abandoned them. They are usually out of state investors so it is very difficult to find them.

Comment 34: They put very minimal amounts of money and one thing that we have found in our community, even though the numbers were higher in urban areas compared to rural areas, the percentage of rural areas foreclosure was higher. What we have found is the investors put a minimal amount of money and the people with all of the foreclosures like the top tier found another job or had enough money to move from homeownership to rental. They took the top tier of the properties and then everybody at whatever level that was they went down a level. Those people that were literally hanging onto their housing by their fingers are now hopeless.

Comment 35: I can probably shed some light on a lot of those. I am president of Empire Board of realtors. One of the things that we are aggressively dealing with is the issue of investors in the market place and so 39 percent of our housing stock was purchased by investors. If you think about it as a real estate professional back in 2006, I always tell people the easiest way to think about it is as you drive down the highway, Metro Brokers had a sign that would give you

a count of the housing stock. Back then it was 110,000. Today you look at it and it is about 32,000. So when you think about just the available access that is in the MLS available to the agent there is an astronomical difference. As it relates to the investor purchase, so the investor created what is called the securitize single family housing. So before the meltdown that was not a securitized item. So they made it, they kind of revamped what they did previously. Instead of doing low notes they went to securitizing single family residential assets. Well the issue with that I think the strategy is faulty is single family residential assets is not saleable. The issues that the investor did not take into account is when they bought in those particular areas, let's say 302 and 310 there is a specific type of person that rents in that. So the investor on Wall Street trying to rent a property in 302 or 310 they don't understand the dynamic of the person who is going to even rent there. So the issue there you are having in those neighborhoods is theft. Issues of weather. Weather related issues have become more significant than anybody anticipated. So when you are talking about having to fix single family scatter site assets as opposed to having an apartment complex and you are replacing two AC units as opposed to 20 AC units then to turn in those neighborhoods that property's to turn about \$8,000 to \$6,000 on a \$40,000 asset. So that now becomes an issue where those areas and those assets become stagnate. Nobody is paying attention. They are having a hard time leasing them up...

Comment 36: The rural areas because they could see when we tried to purchase properties with NSP. You go in there and say it would have an AC unit and you actually started to rehab it and they have gone in and taken out the copper, because nobody was there to see if they were doing it and so you have no heat or air in there.

Comment 37: The issue with HUD, so HUD has the homebuyer bid period. The issue with HUD is and HUD's main concern is not homeownership when it relays to our real assets. Its disposition. I try to get people to understand is what I want them to do is focus on homeownership. Their directive is to get the best rate of return on the assets. So they are now, the REO Disposition Strategy is the very last strategy on what HUD called this tier. So their position, so you have all of these other things going on including note sale. A very large part of HUD's portfolio was sold off in note sales to the same investors we are talking about. So you are battling several different things. They do REO assets on homeownership.

Comment 38: They do...

(Presentation)

Comment 39: So do you have data to show whether that is a lack of activity or there are actually, to go up in the non-entitlement areas what are they based on the data the reasons behind that?

Rob Gaudin: I think it is this in the non-entitlement areas we have these denial rates. Blacks and Native Americans, Hispanic are slightly above non-Hispanics. The same is also true for entitled areas both whites are way less. So we have a total state that looks like this 29, 29, and 29 for blacks, but it is 16 verses 11 for whites. So the denial rates decreased in the entitlement areas for whites. So the upshot is certain groups tend to have higher denial rates, but it is more pronounced in the entitlements between blacks and whites. Interestingly enough if we take a look at the entire state the denial rates by race and income and ethnicity and income, we see of course declining denial rates by income, but the degree to which these higher income groups, black or white this difference has now triple rather than slightly more than half, but when

segregated by income we see blacks are denied considerably more than whites for those households making \$75,000 or more. Now this data isn't every single lending record. Some bankers are depository or non-depository, brokers, but it is a very complete dataset.

Comment 40: Ask the bankers (inaudible) it is and I am wondering and I know how they are tracking this, but I am wondering if there was no ability to track it. It clearly shows that Black Americans are just leading all of the categories, right? I mean American Indians are kind of there in times. Is it because and is this data being tracked because we are checking that on our applications. Then it also says because you don't have to check it. So are they grabbing this information from the start of these applications where people are checking their information? Are they keeping up with it later on somehow? Are they grabbing this data through somewhere else?

Comment 41: It has to count as a reportable transaction as in day to day.

Comment 42: So with that being said where is the discrimination? Obviously, it is somewhere in there, right?

Comment 43: It is not discrimination, because that would be to say if this is discrimination that I am going to look at a white individuals application and a black individuals application that have the same credit scores and the same credit profile and I am going to lend to the white individual and not the black individual. That ain't happening.

Comment 42: So why that denial is rates in the same areas not changing in the entitlement areas.

Comment 43: Credit scores.

Comment 44: So we are saying just 100 percent credit scores?

Comment 45: All the factors that have to be considered in lending and you guys can pop in. There is not discrimination going on when we are looking at applications. I have been in this industry for 20 years and ...

(Inaudible)

Rob Gaudin: One person at a time please. This database does give a reason. I'll call on this gentleman to talk.

Comment 46: I'm as African-American as you can come. You look at my skin and you look at my hair. We do not discriminate based on the fact that this person is African American. When this data is gathered based on all of the data it is going to be run through an automated system and it does not take into consideration your color. It all builds back down to economics. If you are in Atlanta and if you are pooling my market I have several reps in Atlanta. Certainly we are going to have more people that have been through tougher times that are trying to come out of these times. They may be single and have two or three kids so those numbers are certainly going to be high because they are not at this credit score we are requiring. Even Georgia Dream here has its credit scores. Every time I come here for a meeting they are talking about who is not paying us and it is typically the person with a low-credit score. So it is definitely credit based and you are qualifying by your income. It is not that we just look at one area and say let's not loan money. We want to loan money to anyone.

Comment 47: Can I say something? For the individuals who have income above \$75,000 that disparity in 29.6 percent versus 13.4?

Comment 49: It definitely becomes economics.

Comment 50: It is still the same gap. If even if somebody is \$75,000 black and white, how is it still...?

Comment 51: Education. It becomes education. I could just give you general knowledge. Typically when you first come out of school and you get a good job making say \$45,000 or \$50,000. The first thing that you are going to do is get a nice car, because it is all about education. It is not about saving it. It becomes hey I am in Atlanta and I have to live well. So I have to have a nice apartment. I have to have nice clothes. I have to have a nice Beemer. So before you know it you overload yourself. Then you have student loans. It all builds back down to education. If your parents tell you don't get student loans, drive a hoopty for \$1,500 and we will keep it running. Then when you come out an apply you will have that set. You will have good credit. So it boils down to people coming out of single homes and nobody helping them with their education of what I am going to do with the money when I receive it.

Comment 52: Right, so you are saying that other races don't do that.

Comment 53: No they don't.

Comment 54: You are saying the black race is the ones that are going to school, coming out of school.

Comment 55: Leveraged.

Comment 56: We are leveraging ourselves and you are saying today that there is no other race that does that.

Comment 57: Not in Atlanta in the people that apply. I am just telling you and I am serious what I see...

Comment 58: There is no other race that goes to college and the first thing that they graduate...we are the only ones.

Comment 59: Let's think about it. Let's go back about 50 years. If you think about it we are playing catch up to the fact that the system has not been leveled. So you can easily get yourself in too deep too quick. That is what the problem is. I am just telling you. I have two sons. I talked them out of leverage. They have no student loans, but all of their buddies have student loans because nobody was there saying hey don't load yourself up. If look at him he is telling you don't load up quick.

Comment 60: Some of them are getting too much. They are getting \$150,000 in student loans.

Comment 61: That doesn't mean that they are the only race that is doing that.

Comment 62: They are not the only race...

Comment 63: It is disproportionate.

Comment 64: It is disproportionate and it starts somewhere I am...

Comment 65: It is education.

Comment 66: Somewhere in that system you can't say there is not some kind of viewing or discrimination or disconnect.

Comment 67: I don't think it is discrimination. I think it goes back to your education, back to your high school or your junior high levels. We used to have outreach where the bankers were able to go to schools and teach those basic skill sets. There are none of that going on anymore. So you don't have those skill sets and unfortunately like he says going back to generations where one generation is trying to better themselves where they were discriminated against back in the day. It is not that way now it is just that group trying to catch up.

Comment 68: Right it is still the root that we are talking about. What I am saying is still just one group.

Comment 69: It is not discrimination.

Comment 70: It is still just one group that has to do everything thing. Nothing happens to this group that happens like to the other group. I don't think that there is fair and there are other groups that go through the exact same issues that the black people go through, but the numbers are not showing. If you didn't have this teaching thing that you said about coming to your school when you were in elementary. There are other schools that didn't have bankers coming to their school.

Comment 71: I think you are looking at two different families and histories where their training and their education level came from.

Comment 72: I am just talking.

Comment 73: I can bring you a counsel. You do counsel right? The numbers get skewed. We prequalify you sometime and then we go hey you are not ready for a property. So you don't get into the HMDA piece. So you go to the counselor and do everything that you can. You think that you are ready, but you are missing a piece or you may back step and by the time you get the contract and make another mistake, then we have to report it as a denial, but it all boils back down to that education. Sometime they just still have a hard time meeting all of these stringent guidelines. The guidelines certainly have made it tougher on African Americans. I talk about it all the time. I work with it. I am just telling you like it is.

Comment 74: I think because of the whole concept and I guess because I am all about the numbers. I am all about the whole concept form the perspective of (Inaudible) beyond race. Yes things are about race, but it also goes back to what they just talked about. The economics of it, because regardless of what your race is, it depend on what your economic status was at that particular time and what your values are that people do not have these days that that is how fall into these categories because in some ways we are not even teaching the basics of life anymore as to how to live and how to be a productive citizen. So as a part of that that is how we are falling into some of these categories and I am saying that regardless of race. I have people that is like is my issue is that you have to come to work so you are not getting paid. So you can't pay your mortgage and it is not about color either, black and white. I think it goes to that economic base and unfortunately in this particular instance you have people that are of minorities that are at the higher end of the spectrum. I think that it is something that we do

need to try to address, but it goes back to the same thing of education and it is not and it depends on the type of education which goes back to life skills that we don't do anymore.

Comment 75: For every car that you are making a payment on you lose \$75,000 in borrowing money. In the rural areas you have to have a car to get to work. There is no public transportation. If you go...oh the car is about to fall apart, you get your house and you think that you afford it; I am telling you will not be able to get a house if you even buy a used car.

Comment 76: Sometimes that leads them down the path of foreclosure. When the car breaks they have to have another car to go to work. They are going to buy another car and then they have to make a decision between the house and car and you know. The job and hopefully it evens out.

Comment 77: When we are counseling for foreclosure we have a lot of conversations like I make my car payment and I pay for my car. I hope you enjoy sleeping in it, because that is what is going to happen.

Rob Gaudin: Another set of statics is male and female.

Comment 78: I think all of the things that you have been discussing about how you assess loans and what your housing needs are, just amplify the reasons for the AI and HUD's congressional intent to provide more inclusive housing with access to similar schools and transportation and jobs. I think once we achieve that goal then some of these problems do go away.

Rob Gaudin: Just as an anecdote, if I were to map the denial areas those which had a disproportionate share of denials it would be areas largely that are populated by higher poverty rates. So we have higher poverty rates and higher crime rates and higher insurance rates and it becomes more expensive for a household making the same money to get a house. So just there are other issues outside of the control of the individual that are implied.

(Presentation)

Comment 79: Since you are gathering this data you see that we are on a path to repeat ourselves in terms of product that is coming back. What would you suggest as a community including the real estate agent that is pushing for the commission be able to do to stop the consumer from moving away from a good product to just get in the house? That is the consumer making that decision and not the lender. If you tell a person you don't qualify for an FHA loan, but here is another and the realtor says hey I have another guy over here that can get you in the house. What would you suggest?

Rob Gaudin: My own personal opinion?

Comment 80: Yes.

Rob Gaudin: Get rid of payday and car title lenders.

Comment 81: Ugh...

Rob Gaudin: If you are going to get the predatory loan you are going to get the title loan and the payday loan and all of that other stuff. That is just my opinion.

Comment 82: So you are saying that lender that is going to be offering the product and ignore all of the debt ratio requirements should be banned from coming back into the community.

Rob Gaudin: I have personal problems with these lenders because, they take wealth away from us.

Comment 83: Payday lenders.

Rob Gaudin: Payday lenders, car title lenders, that is just my personal opinion. I can't tell you what to do.

Comment 84: I just wanted your opinion since you have got it down more than we do.

Rob Gaudin: I will say who gets these loans. This is the banks and who gets the predatory-style instrument.

Comment 85: Discrimination.

Comment 86: There we go.

Rob Gaudin: Here we go.

(Inaudible)

Comment 87: I think this is what the banks are going to say, they choose that other loan. You can't get an FHA. Let's just say that you do not qualify for it and you are not approved for it, but here is another one.

Comment 88: We don't offer that.

Comment 89: Let's say you don't do that, but even whether or not you are doing it the consumer does not create this other loan option. The industry is producing these other options.

Comment 90: Private sector.

Comment 91: They are targeting that type of population that is saying you know what I know these people are not going to be approved when they come to him, but they are right there. So I am going to create this other model that has nothing to do with this person. They didn't create and they just qualify for that other option. They didn't go and say that I am going to create me a bad loan that is going to be a variable rate and go up...

Comment 92: They don't understand.

(Inaudible)

Comment 93: They understood that it was a bad loan for anybody.

Comment 94: Sometimes you get confused when you say the banks. We are trying to follow the requirements of agencies, Fannie, Freddie, FHA, USDA, but don't throw the bank in with the private sector. Private investor that has 63 billion dollars and decides that they want to do mortgage loans and gather the payment, because that is what a private man can do as well. That is part of the problem. If we teach our consumers to not go there that is the problem. It is not as an individual I have the right to loan my money out to whoever I want at any rate that I

want, because I am not putting a gun to your head for you to come and get it. So we need to, as a community, teach our African Americans not to go for it, because that is where the problem is. They have to learn. We are going to have to stop going into where we can meet the predator.

Comment 95: One thing is interesting is Georgia had the best predatory lending statute under the laws. So that was put into place and it was quickly attacked by the lending industry. It had the best protections in the nation and it was quickly attacked because, and I think what you are getting at is a lot of the lenders, banks, and institutions will own that secondary private. So they are saying on the front end that we cannot provide those loans, but on the backend we can provide those loans on the worst terms. So I think it is unfair to shift all of that blame to the consumer, because the people who have the power challenged the best statute that was in place. Why, because it was financially advantageous for us to offer those loans on a secondary market. Same persons who are owning those institutions are involved in that secondary market.

Comment 96: That is the past, but we are talking about now.

Comment 97: I don't think that it is.

Comment 98: I am just telling you right now that we are heading down the same path to get people ready to not do it again.

Comment 99: From a counselor standpoint, I need to understand this. This is a great discussion. We get calls from lenders all the time. Not private investors, lenders all the time. They say we know the minimum score is 640, but we have product where we can get them in at a score at 580. I am saying no we don't want to do that, because you are now putting them at risk for being on our foreclosure side of our company. Sometimes and I am trying to figure out for the banks that are offering the 580, where is the loan coming from? Is it coming...

Comment 100: FHA.

Comment 101: FHA is a loan and why are they allowing that score knowing they still have tons of collections, tons of student loans and we are now in the industry changing where the student loans will be figured into the debt ratio. I think that is June the 1st. So that is going to change and that percentage is going to increase. It does start with the education and the counseling, but the consumers who want the house and what other lending institution is available that can get me in with this low score? Whose monitoring those guidelines? Why is that allowed?

Comment 102: I have a couple of comments and I am going to come to what you said about the 580s. First of all when we talk about what is available on the market place outside of Fannie Mae, Freddy Mac, FHA lending, VA, and USDA is nil. It is almost nonexistent. We have a little bit of what is now termed non-QM coming back into the market place which is a non-qualified mortgage. So if you are similar with the ability to repay.

Comment 103: Non-GSE.

Comment 104: Well, it would be a non-GSE loan, but ability to repay, it is a CFP rule. It is where congress wrote into law underwriting guideline. Lenders can no longer, you can't make a no income, no assets loan. You can't make a stated income loan. There are two or three lenders that I know of that are bringing back a bank statement product where you can present

bank statements and derive an income from that, but it isn't for the 580 borrowers. First of all, it is a much higher credit score and a larger downpayment. It is not a low downpayment loan at all. Then you have some asset depilation loans that are coming back into the market which by the way is also a Fannie Mae product as well. If someone has large assets you can divide it by 360 and use that as income. You have some private sector investors that are also bring back some asset depilation loans. You don't have variable rates. The rates are set even on the non-QM products I don't think that I have seen anything that is set for less than seven years, because of the ability to repay in the qualified mortgage. So anyone sitting in this room that has not read ATR and QM go to CFPB website and read. It will tell you what the market place can do. What the secondary market can do. Any individual if someone makes a loan to them that is outside of QM, for it to be a qualified mortgage your points have to be 3 percent or less and then it has to meet and can't have a variable grade and so there are several standards for to meet QM. Right now we are under temporary QM. So if it meets HUDs and any of the agency guidelines it is a qualified mortgage, but you still have to stay within your three percentage points. So there is a massive protection in that for the consumer base and I don't know of any large hedge firms that are out there at this point that are offering the psychedelic loans that we saw in the past. So that discussion in my opinion is certainly history and that is not where we are today. So as far as the lower credit score loans it is HUD. Do you guys know of anybody private sector or outside that goes below? If you are talking about 580 loan it is somebody that is getting an FHA or a VA loan, USDA loan. USDA itself does not have a minimum credit score as HUD. HUD is never going to have a minimum credit score. That would be considered discriminatory to base it just off of credit score. So HUD is about access to credit. We just went through our HUD audit and HUD wants us to and lenders to follow their guidelines and give access to credit and do those lower credit score loans, believe it or not. We are denying access to consumers if we don't do that. The flip side of it is we also have to look at our default rate and our compare ratio. HUD, they base our continued approval and access to the program on whether or not our portfolio of loans is performing. So we very much have an invested interest and believe it or not the default rate with HUD nationwide now is 1 percent of the loans. They are considered seriously delinquent, which is a loan that went 60 days or more past due in the first 24 months. That is a serious delinquent ratio. So it isn't coming from the private sector below the 640. It is coming from VA loans and as a company we go down to 580. We don't go below that. We are still seeing approvals in my opinion that are higher than they need to be and when you have 57 percent of an individual's income gross income before taxes going out for housing and other debts and you are making \$2,500 a month. Do the math on that. I don't know how you survive, but those are still loans that will be approved through the AUS system which is FHAs scorecard.

Comment 105: Are considered cost burden and that is one of the things that the AI will be looking at. I am assuming that it will be included in the Analysis.

(Presentation)

Comment 106: The problem with the data and you are just using HUD data is there are two HUD certified Fair Housing Agencies in the state. Only two. That is Metro here and Atlanta, Savannah, Chatham County and they have complaint data as well. GCEO has complaint data separate from HUD and I think when we look at all of that we see more complaints, but I think even then we would be surprised at the low number that we would see, because we know from going out in the communities and talking to people that they either don't know that they have the rights or they know they have the rights, but they don't know how to file a complaint.

We have looked at jurisdictional websites to see how would I file a fair housing complaint and it is sometimes very confusing.

Rob Gaudin: It is very confusing.

(Presentation)

Comment 107: Up until 2010 GCEO had the Substantial Equivalent Certification from HUD, because our law is substantially equivalent, but in 2011 that Substantially Equivalency Certification was revoked because enforcement was not, which was the second tier for substantial equivalency, had not been demonstrated. GCEO has been undergoing some staff changes and organizational changes and I think they will get back on track soon.

Rob Gaudin: Sometime. The individual who was here said that our law is substantially equivalent and we have been doing it all and there is a different set of complaints and I will await those numbers.

(Presentation)

Comment 108: (Inaudible) is this what is on the Fair Housing Survey on the state's website?

Comment 109: On our main page.

(Explanation of how to find survey on State's website)

Comment 110: I just wanted to make a comment. Our agency and I am getting other agencies to fill out the stakeholders is conducting a Fair Housing Survey right now. We had a Homeless and At-Risk Resource Fair this past Wednesday and our City's CDBG representative was there with the Citizen Survey. This is a rural area and 103 people come in and the Department of Labor, dental, medical, and just all kinds of stuff. They were there with a Fair Housing table and we only had out of 103 we only got six to sit down, because they were like this is hard. You are talking low education level and to come in they had to do intake and they had to get tickets to get their lunch. So they did the stuff that they had to do because they wanted to get resources and goodies and free lunch and all of that stuff and they were asking people do I have to do this? This is hard. I mean so we were trying to sit down and do a one on one with them and to get descent survey results that is what we were going to do and that is hard to factor into what you are already doing.

Comment 111: This neighborhood survey or somebody else's neighborhood survey?

Comment 112: It was yours.

Comment 113: OK.

Comment 114: So it wasn't the industry professionals that Rob created. It was the actual Citizen Participation Survey and that was considered (Inaudible)

Comment 115: We had about 70 volunteers, but they were meeting the resources booths. The staff would go in there, but if they got them to sit down with us they would do it, but they...the way the questions are they are in legalize and they do not understand what they are asking. I am just telling you, because we just did it two days ago.

Comment 116: This is the information for us to have because now we have to go back and look at it.

Comment 117: Thirty-five question, right?

Comment 118: I am not quite sure how many questions it is.

Rob Gaudin: There is a Stakeholder's Survey and a Neighborhood Survey. This one that I was reviewing is the Stakeholder's Survey.

Comment 119: We will let you go next if you fill out the survey? Clever survey.

Comment 120: They make it through the first three or four pages and then they would get frustrated. Since it wasn't mandatory they would stop.

Comment 121: It is difficult to get citizen participation.

Comment 122: Particularly if they are low-education. They are not comfortable, they don't understand what you are asking, and if they don't have to do it. So we are going to try to do it one on one. The Housing Authority is going to give it out with when people present applications.

Comment 123: We have an event tomorrow at Stone Crest and in fact DCA will be there. Can you bring some of those surveys to the event? We will be out there from and we have a Financial Freedom and Housing Expo at the Stone Crest Mall. We have six classes, stage, radio station, face painters. It will be tons of about 25 vendors and SunTrust. So that is a great opportunity. You are in the mall and we have the whole bottom level of the mall and we have a stage set up in front of Sears. It is a good opportunity. DCA is one of the table vendors and you guys could bring that out there.

Comment 124: What time is that going to be from?

Comment 126: Ten to six at Stone Crest Mall.

Comment 127: Who were you coordinating with here at DCA?

Comment 128: I don't know. My education person is the one handling that, but I can find out from her. I know she told me that you guys have a table.

Comment 129: Can I give you my card?

Comment 130: Sure.

Comment 131: Would you prefer paper?

Comment 132: It needs to be paper.

Comment 133: I could easily put it on a PowerPoint the link and I could distribute it in the training program throughout the metro area.

Comment 134: In addition to saying that it is too difficult you are saying that it is too long? Do you want us to shorten it?

Comment 135: I am just telling you the feedback that we got.

Comment 136: We appreciate the feedback.

Comment 137: What we would also like to do is have you as well look at the survey. There could be some things that we hadn't thought about and then put that in the survey as far as disabilities are concerned or Limited English Proficiency or whatever.

Comment 138: We found out if we did one on one with them that they would do it and it made them feel more comfortable. If you want... that will get us quality data, but it won't get us volume.

(Explanation of location of surveys on website)

Comment 139: The low-income households, many of them are not computer savvy. You have to give them hard copies. That is just the way that it is.

Comment 140: Those are the people that you want to reach too. So you definitely want to do that.

Comment 141: I was thinking that if they could do it on their phone in a timely manner that would be OK, but you can't so.

(Presentation)

APPENDIX F. MINUTES FROM 2015 ATHENS FAIR HOUSING FORUM

Comment 1: It is good in theory, but it is not practical because the nicer apartment complexes don't want our clients in their apartments. So what do you do?

Rob Gaudin: There are challenges. HUD expectations are moving to something and you can't just flip a switch on it.

(Presentation)

Comment 2: I cover the southeast part of the state and the Hispanic and especially and not to assume that all farm workers are Hispanic, but there is a huge concentration of agriculture in the southeast and everywhere else and around this time of the year. We get farm workers, migrant farm workers and lately I have been going around and visiting a lot of libraries and healthy departments and dropping of Spanish language posters and DCA information. They all have it. You can tell in a county where they have a high concentration of Spanish speakers, because all of the public facilities have bilingual signs. That is a real thing and it is based on the farm work mostly.

Rob Gaudin: Are these migrant workers mostly?

Comment 3: I think a lot of the times they settle and get into construction and stay on. We are not seeing people that leave after six months. They are coming, migrant workers are coming to agricultural areas and are a lot of the times staying too. We saw, and I live North of I-16 in a yellow area, but we see that there too, that the construction workers they are by far doing road work and housing it is all going to be Latinos before the crash and now they are starting to come back in that part of the state. It is and thinks that the agriculture draws them and then they stay. They settle and they establish restaurants and businesses and do construction and all kinds of...

Rob Gaudin: Let's not forget in the urbanized areas there is a greater concentration. There is 11 percent of the population. We didn't really look to see how they were geographically distributed there. I also think that the occupations that they select such as agriculture or landscaping would reflect some of that. The question is, it only employment driven?

(Presentation)

Comment 4: If DCA was able to take control of transportation spending and improve transportation access. That is what I see. I work with the Homeless Coalition in Southeast Georgia and I told them you guys need to go to this meeting, Blakely would be closer. First of all there are not enough meetings in the south of the state. I don't know who set them up, but I provided and I was asked to provide a list of possible sites in South Georgia and I did and they were not chosen. So I don't know who made that decision, but my folks in Tifton said oh it is because affordable housing is way out in the county, but if you have a job at those few factories in town you can't get there, because you have the cheap trailer out in the county and there is no public transportation in most counties or if there is there are these sort of hybrid DOT, Department of Transportation services type systems. The coastal region has a system like that and some counties have systems like that, but it is three or four dollars each way and that is a lot of money, because you have just shelled out half of your daily income on transportation. So that is their big concern is that this particular community they are on I-75,

they see a lot of people get dumped there and a lot of the homelessness is just people having fights at the truck stop and separating. So they get homeless women. They have these really bizarre and hard to deal with situations and they also have the joblessness and homelessness problem, because they are a very rural county, I-75 goes through them, but they are extremely rural and so people there is just this huge disconnect. There is the great wealth of the interstate and there is the great poverty a mile or so off that. So the money is just not trickling down and DCA can't and I go to these meetings and I sit there and take notes and I send the notes back to Atlanta, but we can't do anything. There is nothing that we can do. We work with the Regional Commissions who of their own validation sometimes have set up these regional transportations. Coastal Georgia Regional Commission did that and I think Southwest Georgia Regional Commission has a system where they cobbled together DOT money with DHS money and they create these rural transportation systems, but you still have to pay, three, or four, or five dollars every time you get on and various county lines you pass through you pay more. So if you have a hospital appointment three counties away that is a very expensive day.

Rob Gaudin: Very challenging issues.

Comment 5: I wish we could do more. What do you want DCA to do?

Comment 6: We also are biggest thing in Newton-Rockdale is transportation and it is not far out. It is just there is no public transportation there and nobody wants to live there. I live there, but nobody wants to go in those counties if to face the unknown. They would rather stay in that one area where they can walk to a bus stop and get on the bus and go where they need to go.

Comment 7: That is your concentration is the bus route.

Comment 8: Yes and to clarify. DCA gives us more housing in Gwinnett. DBHDD gives us more money for Gwinnett. Gwinnett gives us grants and it is just hard to get anything in those other areas. It is hard.

(Presentation)

Comment 9: I would like to get and I am not sure that I have ever received the survey. If I did I probably didn't complete it and it is because I am not directly and I don't know the answers to a lot of them. I don't get that feedback, but please I would like to get it. I will send it to all of my homeless coalition folks who are agency reps who can then share it with their clients.

Comment 10: I was going to say that, I serve on the North Easter Homeless Coalitions and I have never seen the survey. I am not sure.

Comment 11: If you send it, I will make sure.

Rob Gaudin: I will send it to everyone on each meetings list.

Comment 12: I will make sure that all of my colleagues then get it out to our coalition groups.

Rob Gaudin: There is no reason to think we can't have at least a couple hundred replies.

Comment 13: This might have been on a DCA newsletter which means that even I just skim through it.

Rob Gaudin: They said that they sent it to everyone at your agency.

Comment 14: It could be funded agencies executive director which means it may not have floated down.

Rob Gaudin: They said they sent it to everyone on the constant contact.

Comment 15: That would be elected officials and you know what they are not going to complete stuff like that either. Their staff will, but a chief elected official will not so much.

Rob Gaudin: I agree, you cannot survey an elected official. There is nothing to be gained from them.

Comment 16: So it is midlevel who have access to clients.

Rob Gaudin: You need to survey staff and operational people at every level, like if it is a property management firm or it is the banking industry and it is a banker, realtors who are going to be at the operational level and not management, because operationally they will know what we are looking for. In an effort to also facilitate public involvement if you could also figure out some way if you have some friends or you go to church and maybe your church knows the other church leaders, whatever it is. There is time to have this fill out and get some more responses. What they have had isn't quite working. I understand that it is prominently on the DCA website.

Comment 17: Really?

Comment 18: I can make my staff take it. I have 100 or 200 clients. So my staff can take it out and teach and that could be a part of their computer skills teaching to take that and send it to the apartment complex. I have 30 apartment complexes.

Rob Gaudin: That would be great. If they don't know, just say don't know. That is fine. If they know and especially if they have been treated a certain way that is what I want to hear. Is there something that we need to do about that?

Comment 19: You may get more than you want from my clients.

(Laughter)

Rob Gaudin: That is alright. If they do it on line then it is also online.

Comment 20: I think we can get your number. I think and I know that in Georgia and I see this, people it is like the degrees of separation. It has to be a few degrees of separation. Like getting an email from DCA depending on what your position is you may not pay that much attention, but if you get it from someone that you know in DCA it makes such a difference. I have seen that. People will keep contacting me for all kinds of crazy things, but it is because they know that I am there and they know me. I am their point of contact and it doesn't matter they will send me anything under the sun. It is very much a relationship thing we have seen. That is why we do have regional staff, but in housing we only have a few of us, but still we do go to these coalition meetings. If I send an email out they are all going to look at it and say I will take that survey and I will have my clients take it. That will help.

Rob Gaudin: I get back to my office on Friday. Tonight I drive from here to Hinesville and get up in the morning. A little bit of driving is ahead for me, but when I get back to the office I will take all of these forms from the various meetings and hand it to one of my staff people who will send you a pdf of the presentation as well as some narrative about the survey and a link to click on. If you need a Spanish copy, please reply to that and she will also send you the Spanish copy.

Comment 21: You say it is on the DCA website, I will go look for it.

Rob Gaudin: Please go look for it. I would be very curious.

Comment 22: I wonder where it is?

Rob Gaudin: I know where it is. It has taken too much to find it.

Comment 23: On the front page it does say something like let us know, but I didn't know that I could click on that. It is not like red or blue. It does say something about Fair Housing on the front page. It does. I just never clicked on that. I was looking so I went down to...

Rob Gaudin: Look for a link, but they haven't done anything wrong. It is just we need to come back around and revisit and maybe they can send out a second reminder and ask them to put my name on the reminder list and see what it looks like when it really comes out. I may or may not get that.

Comment 24: I will ask and see when I got it, because I don't remember getting it.

APPENDIX G. MINUTES FROM 2015 BLAKELY FAIR HOUSING FORUM

Comment 1: Why is that?

Rob Gaudin: That is the question we need to ask ourselves.

Comment 2: Well I can answer.

Rob Gaudin: You have the answers?

Comment 3: The politicians are in Atlanta. DCA is in Atlanta. That is where the money is.

Rob Gaudin: I am recording this.

Comment 4: I will shout it from the rooftop. Hit below the net line and look at DCA.

Comment 5: The same question has been asked for the last ten years at best.

Comment 6: At these meetings.

Comment 7: Same meetings. Same questions. Same results being analyzed.

Rob Gaudin: Same question? What is the question?

Comment 8: Why isn't there anymore investment by DCA?

Comment 9: What are the impediments? Same questions and same answers every year.

Rob Gaudin: Really? Well I am here this time for better or worse.

Comment 10: Good.

Rob Gaudin: This is my conclusion as well that the North seems to get it. There are correlations between these vouchers and black populations which is another set of questions it is not just geographic that HUD will want us to refer to. So in a way this analysis is like an audit. This is what we have done in the past. Do we want to pursue that and continue that in the future or should we have some of these vouchers elsewhere? The voucher resources are being limited and there is less flexibility today than there used to be. They are also portable. They travel where people want to move.

(Presentation)

Comment 11: Could it be that the lack of education that maybe that is, you know the rating is like it is. Whereas you know there are probably more whites going to school, getting their degrees and compare it to blacks going to school and getting their degrees. Do you think that can play a part as to even owning their own business, because you do need some type of education for that?

Rob Gaudin: You are absolutely correct. There are "reasons" for the denial. There are three fields for each record. One of them frequently is credit and lack of employment history and a few other things. It never says anything about education. Getting an education, a financial education is an important element in being able to understand the value of having good credit is very important and people are less challenged when they have that. This is why Asians are a

little higher and they are very close to whites and I think they are very culturally sensitive to those issues. I certain Asian groups off the charts with denial rates, but they were one Asian population.

(Presentation)

Comment 12: What about with the Census male and female? Could it do with more males are incarcerated or had felonies or something like that to really get this entitlement compared to females? Females are more stable.

Rob Gaudin: In the entitlements 15 verse 18 it is very close. It is more of a problem in the non-entitlements. Incarceration and getting in trouble with the law is of course a huge concern and you have long-term troubles with trying to make these choices. For those who haven't, if you are a male and you have a history with problems with the law then you probably wouldn't be applying for a loan.

Comment 13: But the female.

Rob Gaudin: That is right.

Comment 14: I think that part of the denial part and I am only speaking for us. I work for Habitat for Humanity in Valdosta and we built 250 houses. Our average mortgage price including taxes, insurance, termite bind, our average home price for a three bedrooms, two bath home, landscaped front yard, all of that included is \$380 a month. We can only qualify 1 in 20. The main reason, our main focus is debt to income ratio. Debt has jumped gigantically. Income has not in the comparisons that we do. The other part is we know from about 2002,1 we have got so much more information, because of computers and people reporting to each other, we have so much more information on Joe and Jane Doe applying for a house than we ever had. So I think we are getting smarter about them, but it is bringing up more negative information. The debt to income ratio, the debt the biggest booger on earth coming up next to this economy is going to be student loan. Every time you turn on the TV now there is an ad for some online university. The first thing they tell you is we will take care of that application for student loan. They say that they are non-profit, but they are digging awful hard.

Rob Gaudin: Their offices are paid a lot.

Comment 15: Northern New Hampshire University and all that kind of stuff. We had a guy in the \$75,000 range apply for a Habitat home and we had to turn him down because he had a \$160,000 worth of student loans.

Rob Gaudin: They are challenging times and part of the education that you suggested was to teach people to not take on so much debt.

Comment 16: I think it is only about education. We are a HUD certified new homeowner counseling service. We are the only left in Valdosta. There were a bunch of them that came in when HUD was actually paying folks for attendance and that scam became that they falsified records. They said that they had 100 people come to a meeting when they had three and stuff like that and so they got caught.

Rob Gaudin: That is unfortunate that that spoils it for everyone, but it doesn't remove the fact that education does play a role.

Comment 17: Absolutely.

(Presentation)

Comment 18: Do you have any data on older adults?

Rob Gaudin: What do you mean? Lending data?

Comment 19: Yes.

Rob Gaudin: This data base does not have age. So if they were twenty, I could say first-time homebuyer. If they are 50, they are much less likely to be a first-time homebuyer. They are trading up, but it is still the home purchase transaction.

(Presentation)

Comment 20: The problem is I find, is when you try to get them into the office and I did housing counseling. One of the problems that I find is when they come into the office they expect you to fix everything. They don't want to do any of the work. I have a lot of clients that would come in and they would come in for the very first session, the very first meeting. Then they don't come back when I tell them we have to work together and it is not that I am fixing it. I have had a client leave my office because there is a lawyer that they have found online that they have paid \$1,500 to do that quick fix where they challenge everything on their credit report and then they have a clean credit report for 90 days. They would pay that person \$1,500 verses coming to my office where they pay just for the credit report and we work along and clean it up permanently and they don't come back, but they can come up with the \$1,500 to pay the attorney. I am like, I don't understand. You are 200 percent below the AMI, but you can come up with \$1,500 to pay someone to challenge everything and 90 days later all of that so coming back on your credit report. So none of that is cleared.

Rob Gaudin: I hear you. I think again it is about education.

Comment 21: You can't get us into education. Then I don't understand.

Rob Gaudin: I am with you. I don't understand that either.

(Presentation)

Comment 22: I could tell you why.

Rob Gaudin: Sure.

Comment 23: They are afraid to file. They are afraid to file. I have filed three cases last year and I don't ask them to file. When they come in I just say OK we will do it and I just go ahead and fill the paper out and say sign this. We have won all of the cases that we have submitted, but as a matter of fact we have two cases that their living situation was really bad and we found the, I found them places to live in the process and because they found new places to live they dropped the cases. They said that I found some place to live and I don't want to be bothered any more. I was like are you serious? So somebody else is going to walk into your problem. I had one young lady where she lived if you touched a wall it just crumbled and because I worked with Ms. Joyce's Housing Complex and she was able to move in there. She said it was such a nice place to live that she didn't even want to be bothered. I was like are you serious.

We have and I have pictures of how bad where she was living and she would not come back and finish the paperwork.

Rob Gaudin: That happens in this complaint process.

(Presentation)

Comment 24: I have a question since I was late. What the difference between entitlements area and a non-entitlement area. I came in late so could you explain that to me.

Rob Gaudin: Yes. The entitlement areas are those geography's city, county, multiple county regions, consortium who get an allocation from HUD directly. A formula allocation and then they too have to do a Consolidated Plan and an AI and an Annual Action Plan. They have separate processes for them. The non-entitled areas are those areas which are covered under the state's CDBG plan.

Comment 25: Is that the Continuum of Care?

Rob Gaudin: The Continuum of Care, the ESG, those are different geographic areas. They always attach themselves to something. They are not required to do an AI, but one of their master jurisdictions will have to do the AI.

Comment 26: I guess that is the balance of state.

Rob Gaudin: That would be balance of the state here.

Comment 27: So it would be considered the non-entitlement areas.

Rob Gaudin: Correct.

(Presentation)

Comment 28: So all of our cases now have to go directly to HUD?

Rob Gaudin: Yes.

Comment 29: That is a good thing to know.

(Presentation)

Comment 30: Out of curiosity why did they not track age?

Rob Gaudin: Age is not a protected class.

Comment 31: I work with the Council on Aging, so I work with the 14 counties in southwest Georgia. So that is why I am so focused on age.

Rob Gaudin: You can have additional protections under state or local office and any jurisdiction do. Their list can be very long. Then we go to that agency and ask for the complaints to incorporate to try to access how impacts are on those additional; protected classes, but it is just the federal protections that are down here. So we have a real significant problem with all of that.

Comment 32: I have a question. Since they didn't and I am looking at and I filed three cases in 2014 and I don't see that they put anything there, but I know they investigated and nothing ever happened. So what happens to those cases?

Rob Gaudin: I don't know. These are the cases that got somehow fielded by them. I don't think they do anything. We don't have any data that indicates what the closure is, the closure status. We do with HUDs data and that will be presented in the report. Typically it is less than half of the cases are closed through conciliation or some settlement. The rest of them are lost through the process. So overall the system doesn't work that well to begin with, but having this loss...

Comment 33: So the clients are just left in limbo and they just threw it away. I know one of the cases that I did they went to the point where they investigated, talked to the landlord, talked to the, and the investigator actually came down to the community and they were down to the negotiation part as to what the tenant wanted and how much the landlord was going to pay. Then all of a sudden the investigator stopped answering her phone calls and replying and we got no resolution. So what does she do now?

Rob Gaudin: I don't have any idea. Maybe she works on civil cases or employment cases.

(Presentation)

Comment 34: She just said that the complaints never get filled and some are even lost in the process. So what are we doing?

Rob Gaudin: This is a fair housing survey. It is different than what the complaint data is for the Commission. I am appealing to you; if you put your email address I will send you the link to the survey. I will send you the digital copy, a PDF if you want to have it out. That would be great.

Comment 35: Could you by chance send someone from the Atlanta area for where all of this has been going on down here. It is not that you are not doing your job, but someone who will come down and make a change in it. I have a complaint right now with fair housing and it boils down to nothing but race and politics. So but some higher up come down and talk and get the feel for what these folks are going through.

Comment 36: We know the issues. All of those slides that you showed us. We feel it. We live it every day. Year in and year out and no real progress or no measurement and no outcomes. The data is just looked at and glossed over year after year. Another year tacked on.

Comment 37: What made them change the meeting from Atlanta area to Blakely?

Comment 38: I think Joyce had a lot to do with it, but what made the change there?

Rob Gaudin: I am not familiar with that. My proposal I proposed to make five presentations. They wanted to do nine. We could maybe get six or seven, but I am losing count now. Teresa Concanon was asked to provide some suggestions in southern Georgia. I overheard her saying and they only selected Hinesville and Blakely. I can't answer that for the department. I am not with the department. I am a contractor they hired based on our experience with fair housing.

Comment 39: So you don't work for DCA.

Rob Gaudin: Correct. I work for Western Economic Services out of Portland, Oregon. I am a long ways from home.

Comment 40: He works at DCA though.

Comment 41: What do you do at DCA?

Comment 42: I am Housing Program Coordinator. My job is to come to functions like this and promote and talk about our Housing Programs. I serve regions 4, 6, 8, and 10. I actually live in Cuthbert. I have lived here for almost 13 years. Part of my job is to promote our housing programs. I talk about Georgia Dream, CHIP and other programs.

Comment 43: I guess I am trying to integrate all of this and listen to everyone talk about it might be the political part of it or it could be the rural areas, because we are in the rural areas that a lot of the complaints or things that need to take place it is not as major or we don't get as many complaints as Atlanta.

Rob Gaudin: You have half of the state's population.

Comment 44: It is a major as Atlanta. It is even worse down here.

Comment 45: Not when you are dealing with, You probably have 10 complaints here in the rural area. I am talking about the rural area and not Atlanta Georgia, but if you go to Atlanta Georgia then you are really talking about some problems. I mean they probably have 200 or 500 complaints compared to here. I mean because and then you have the people that is in Atlanta that is going back to education again. They are aware. They are educated on how to go through the process, but here in the rural area we only can go by what someone can tell us. You know we are not advanced as these people in and a lot of times in the rural area it is because of fear or we don't know how to go about doing the process. It is not that and you mentioned about the application that took place in 2014 that nothing happened. Where is that? But when you are dealing with something more severe and more. It is a lot bigger somewhere else compared to the rural areas.

Comment 46: I would challenge that. I would challenge that because it doesn't matter where you are located. What I notice is there is Atlanta and then there is the rest of Georgia. The thing that I noticed is that everything stops at Atlanta and they forget about us, because we have more and our issues here in southwest Georgia is just as severe if not worse than down there. What I have noticed in my five years living here in south Georgia there is one price for Dean and there is a price for me when it comes down to renting. He will get a better deal in rental then I would just base on how we look.

Rob Gaudin: I want to hear about that in this survey. I need to hear this. I need your help.

Comment 47: The other problem is I have Caucasians file complaints and I have had African Americans file complaints. It makes no difference as to race who is making the complaints. The problem that I have is everybody is afraid. When you live in these small towns and you file the complaints. They want to know and as a matter of fact I never had a sign out in my building until this week and the reason and the complaints were filed, the first thing they were asking these people is where did you get your information from? The name of my organization is Youth and Community Empowerment. So people think that I deal with youth. That is good for me, because the thing about it is everybody is afraid to file the complaints. The lady that I said

because she got housing at Joyce's place dropped the complaint is because she didn't want to follow through, because she thought she would have got kicked out.

Comment 48: But they deal with it every day in Atlanta. They don't have people that are afraid to file.

Comment 49: I ain't afraid of nobody.

Comment 50: We are not talking about you now. We are talking about the clients, themselves.

Comment 51: My agency educates. I have a housing, homebuyer training that we are going to have on the 27th. The problem is that we don't have enough people that is going to inform. You have an agency back there and right here in Early County that had community development with Ms. Nancy. How many people know that she is here? How many people go to her office and ask for help? I am in Bainbridge and I advertise and I hear oh I didn't know you were here. I have been here for two and a half years. I have people call me ask me what do I do? I tell them. I had a lady call me the other day and she is about to go get a second mortgage. She calls me and asks me can I help and I say yes. She is going to call me back after she fills out the paper work for a second mortgage. Really? You understand what I am saying. So it is not a fact that they are not educated. It is not a matter of fact that the paperwork is not there. It is just that they want to do what they want to do when they want to do it. It is not that the education doesn't process or that it is not there. It is not a comparison to Atlanta and South Georgia. It is what we are used to and they are afraid because I am telling you that you can knock on houses and doors. I had to go get me a concealed weapon and I am packing. You see what I am saying. I am packing. When you see me I am packing. I am loaded.

Rob Gaudin: Well let's not go that far here.

Comment 52: No, No, no I am just telling you how I know this area is.

Rob Gaudin: What I want from you is your opinions on this survey. We only have 46 replies from the entire state with nine million people. I showed you the first slide and Wyoming had 400 and they have less than one million people.

Comment 53: I am from Wyoming. See now most of the things that you are doing they are great. They are pacifying the people. They sent you here doing surveys that is not doing anything for the people here. The people are in great need.

Rob Gaudin: Well I don't know about that, but if this survey I am soliciting your opinion.

Comment 54: How did the surveys get distributed.

Rob Gaudin: That is my challenge.

Comment 55: Wyoming doesn't have fair housing anywhere.

Rob Gaudin: Please let me answer this question and I will get back to your question. In all of these surveys we use the same method of distribution. Which is to ask the client to send it to their list via email of stakeholders, anybody involved. If you are a representative of a special population group or you are an in need service provider. They got it and they were also informed to just distribute it to whoever you wish.

Comment 56: Who did you send that to?

Rob Gaudin: In each of these cases the client distributed the survey.

Comment 57: DCA did.

Rob Gaudin: DCA distributed this survey. For whatever reason they said they sent it to thousands of people on these constant contact list.

Comment 58: I have never seen that.

Rob Gaudin: Well everybody has said that at every fair housing forum. I have never seen that. Fine. Whatever, please if your email address is on the sign in sheet I will send you this survey the link. I will send you an announcement. I will send you a link and you a copy of the presentation and I will send you a printed copy so you can hand it out to those who do not have access to a computer.

Comment 59: I think that goes back to the concern of why the numbers are so low. I am the program manager for the aging and disability services for Southwest Georgia. So I have a network of professionals all across the state who serves for aging and disabilities. We have never heard of this.

Rob Gaudin: I want you to take the survey.

Comment 60: We will certainly do that, but I am saying if DCA targets who they send to it they will get the numbers that they want to get.

Rob Gaudin: I am not sure they think they sent it, but did they send it? I don't know. I don't know what happened. Something has happened that their 10,000 people they sent it to got no response from them, but please let's just do this. I will send it to everyone on the sign in sheet. Hand it around your community. Get it and we have a few months really. If you can get it done by mid-July that would be great. I get a draft report to DCA August the 1st. You complain that nothing has ever been done and I am trying to work with you here to get your opinions to them.

Comment 61: This is the same survey that was asked to fill out last year and the year before that.

Rob Gaudin: No, it is not.

Comment 62: This year is different. We are going to really get some outcomes.

Rob Gaudin: We could do nothing which is what you are advocating.

Comment 63: No we are here because we want something done. We just don't want to fill out a survey for it to go in some circular wastebasket or something equivalent.

Rob Gaudin: I am doing the best that I can. I am not to blame. I am just the guy doing the work. If you will help me with it maybe we can get some message through.

Comment 64: What I said wasn't directed at you, ok.

Rob Gaudin: That is fine you can shoot the messenger. That is fine, but the reality is if you shoot the messenger, the messenger can't get the message done.

Comment 65: Maybe the messenger needs to bring the higher up. Nothing on you, but I think that the Atlanta folks need to come, not just here, but anywhere in the state instead of staying up in Atlanta.

Rob Gaudin: I am very sensitive to that issue. I am surprised that no one accompanied me. I have driven a thousand miles all over the state and no one accompanied me. We had a representative of DCA I think at most meetings, but they have never seen the survey or don't know what is going on either. I am assuming it is correct, but no one accompanied me. I didn't drive the 15 hours on Tuesday from Dalton all the way to Hinesville, but whatever I am trying to do the job for you all.

Comment 66: May I make a recommendation.

Rob Gaudin: Yes and please this woman hasn't yet spoken.

Comment 67: My name is Jo Childers and I also work with DCA. I am a regional rep for 30 counties. It is very narrow and wide. A lot of our contacts are with city and county governments, chambers, development authorities. I do something called the Georgia County Economic Development and we try to do the outreach, but we don't know who the contact it is hard to expand that. We have 56 different programs. Some federal and some state, so Dean handles four regions and how many counties?

Comment 68: Fifty one.

Comment 69: Fifty one, so we are here to help. We have programs that, there is many housing programs. There are many loan programs for people looking for housing for purchasing their first home. Low-income housing tax credits for developers, but it is the developers that come to us for the tax-credits. We don't tell them where to build them, but we are here to help. I just wanted to say that I am here and I am from DCA.

Rob Gaudin: Would you please fill out the survey?

Comment 70: I am going to fill out the survey.

Comment 71: I would say that I actually live here and worked in housing for a number of years before I joined DCA, so I am actually passionate about housing because I worked in housing for a long time before joining DCA. I work with Olive in the Southwest Georgia housing Task Force and Joyce I have worked with her in different things. I just hope that they know and Dana, that they know that housing is in my heart.

Comment 72: I am with the Department of Labor and I am the vet rep for the Outreach Program and I really think that and I loved it and I just recently started but I loved the way that they called this program the Outreach Program, because when you are going out and you are touching base with different people in the community, different businesses and everything and you grasp on a lot more information once you come in contact. Especially and I keep mentioning about the rural areas. The rural areas you know the communication is not as broad. So you have to get out. You have to touch base and even with the survey that he is talking about that you know sometimes that you have to like go to your City Council Meetings or your

County Commissioner Meetings, or the Chamber of Commerce. Those people are the ones that in order to get that communication going it is either going in newspapers or it is going in flyers. Go to the library. Anybody that can bring all of that and just give this information out to different people in the area, because in the rural areas we either on the telephone or we are going by what someone else said or something like that. Which the information is either true or it is false. So I mean to really get people and increase those numbers we have to become active as well as going and explaining just like some of us at this meeting. If we could go to city council meeting and present that we need this survey. You know if we can get the community involved.

Rob Gaudin: I will leave it open up until the time that the final report is done, but I have couple of slides.

(Presentation)

Comment 73: Do you have any idea of what is going to be done once this survey is completed and put together. What is going to be the end result?

Rob Gaudin: The end result is a report that evaluates lending and housing complaints and everything I presented here shows a lot more geographic maps and it will be about 100 to 200 pages. There will be transcripts because I am recording this. There will be transcripts from each of the meetings. It won't be by name. It will be comment 1 and comment 2, but the idea is all of this information will be provided to DCA; will identify some impediments; we will recommend some actions; how to measure those things; and at what time schedule, because that is what HUD expects. The outcome of this young lady here who has suggested that they haven't done anything in the past. They are under a microscope now and they really have to do something.

Comment 74: Because DCA is taking on policies now that are in fact an impediment in some cases. I am a rural grassroots CHDO, their current policies have all but decimated that characteristic. I am an extinct developer in the state of Georgia based on recent policy changes that DCA has made and I would think as a result of surveys, analysis to impediments, because they no longer decreased grass roots CHDOs get the job done. So I am kind of a little...

Rob Gaudin: So if that is the way you feel.

Comment 75: That is the way it is sir.

Rob Gaudin: I offer you...

Comment 76: Joyce Barr Phase Inc. is no longer a grass roots CHDO as a result of DCAs latest policy decision. Now I am on the record.

Rob Gaudin: You are on the record. That is correct. Your name still won't come up. It will be comment number 17, 27, or 47, but we had the same thing in the public sector. You know that I am looking for you all to participate in this survey. The few comments that we receive said these things.

(Presentation)

Comment 77: That is every bit of my complaint. Every one of them I have and like I said a complaint filed with DCA, HUD, whoever it may be have prime acreage for development, but

because of white community area neighborhood. It is not even all white, but in the area where that property is the probably 85 percent of the homes are rental, but because it is already zoned for R-1 they will not zone it PUD when it is walking distance to downtown. Like I said in the very beginning it has nothing to do with except race and politics.

Comment 78: Isn't that local government decision?

(Inaudible)

Comment 79: I live in Americus so there was a low-income housing senior project that went in and it has been the best thing in our neighborhood.

Rob Gaudin: DCA has the capacity to change those things by the way in which they administer their programs. Other states have done that. Here in the south, I know that.

(Presentation)

Comment 80: I love the last one.

Comment 81: Does that last one say fair housing infrastructure is poor except for Atlanta and the Chatham County?

Rob Gaudin: That is what it says.

Comment 82: OK. I am just trying to get it straight here.

Rob Gaudin: They have a FHIP there. The Fair Housing Initiative Program participant so it is stronger there than here.

(Presentation)

Comment 83: Is there a website that we could go to and do this fair housing thing or do we have to get it from you?

Comment 84: You go to our DCA homepage.

Rob Gaudin: You can. You can find it that way and then you see two fair housing surveys. I have checked it out. One is for consumers and one is for professionals. That is not exactly true, but I would prefer you use the link that I provide you. It is also the link that is on there, but to find it on DCA website is a little bit of a challenge. It says tell us something like fair housing survey, fair housing is the law. Tell us what you think. It doesn't appear as a link. You have to put your cursor over it and click on it then it goes to the next page. Then you have a selection of things.

Comment 85: We have what might and the point of my question is we have about 75 people in our new homeowner workshops. I would like to give each one of them the web address and we have at the workshop computers for them to use. I would like to as part of the new homebuyer education, part of this thing for them to fill out.

Rob Gaudin: I will email you this. I will email everyone who has signed this sheet and included an email address a copy of the presentation...

Comment 86: I heard you when you said that.

Rob Gaudin: I mean it because today we have 90 some odd responses from what and I haven't sent out any of this yet and hopefully it will happen tomorrow. Tomorrow is Friday, right. Yes when I get back to Portland. Here is a copy of my contact information if you want to email me anything, please feel free to do so and you will get a copy of this presentation which has my contact information in it. If you want to voice your opinion about this presentation or anything else about the AI or impeding AI. The person I report to in this is this person.

Comment 87: You report to yourself?

Rob Gaudin: She asked me to back out. Just a minute. I do report to myself and my company.

Comment 88: You probably get real good reviews.

Rob Gaudin: I don't ever get an employee appraisal.

Comment 89: Are local officials or officials in general required to be educated in fair housing laws?

Rob Gaudin: They are not required, but they should be.

Comment 90: That is one thing I would put in as an impediment.

Comment 91: The local county attorney or city attorney.

Comment 92: That is what I was saying if you did collaborate together.

(Inaudible)

Comment 93: This information right here should be given to someone in your city or your county that way it can, they can broadcast it to their citizens of who they serve.

Rob Gaudin: Theoretically you should be able to use the AI as an educational tool when it is done. So that is my intent to provide an educational tool.

Comment 94: I think it should be required to receive funding.

Comment 95: I think so too.

Comment 96: You have city councilmen rigging public hearings with petitions and nobody is showing up and saying the majority opposition is based on signed petitions and some of the names are not even valid names. Then they say that is supposed to constitute a no zoning change. I mean it is just crazy.

Comment 97: Somebody could make a movie out of that.

Comment 98: Are you sure they are going to have a public hearing and they show up and they already passed everything. Then you show up and sign up and say that you want to comment and they have already made a decision.

Rob Gaudin: As to your comment monitoring would be a way to implement that. For any application that can into DCA they would have to show that they are affirmatively furthering fair housing. They have to do that according to HUD and to indicate they are affirmatively furthering fair housing they need to take some actions. These are perspective actions outreach

and education and HUD says that that is only the first step and you need to do more than that. Right, so outreach and education would involve units of local government officials, management officials, property management and program management officials. That would be a way to work that out. You do it inexpensively through webinars. You wouldn't have to travel or stay at a hotel in Atlanta. So that could all be done relatively inexpensively.

Comment 99: They could pay me to do it. I am there.

(Laughter)

Rob Gaudin: I do want to thank you very much for your comments even the ones of disheartening tone. It is important that we understand the context at what people are operating.

Comment 100: Disheartening is not a strong enough word. My livelihood has been affected.

Comment 101: There is a reason for the disheartening. There is a reason. I would say five or seven years ago we were very close in Georgia to having a realistically equitable distribution of fair housing knowledge, of fair housing information, of fair housing money. In the last five to seven years that knowledge, that money, that whatever has shrunk dramatically. There is no mystery that HUD wants a report from DCA saying they sent you down here and here is where we made a check to give knowledge to these poor devils in South Georgia in the non-entitlement communities. So we will get the same amount of money next year. HUD is looking at votes. The votes are in Atlanta. They do as all of those little dots around Atlanta and surrounding metro. Like the old show says, show me the money. It is where the money is and HUD goes to where the money is, DCA goes where HUD wants them to go. The reality of life is of outside of metro Atlanta. We are below the net line. We don't know where the nets are.

Rob Gaudin: I appreciate your commentary.

Comment 102: It is not a commentary. I hate that you are kind of talking down your nose to me. I don't like that.

Rob Gaudin: I am sorry. That is not what I meant.

Comment 103: That was very sarcastic on your part. I sweat with these families every day and it breaks my heart every time I have to turn somebody down, but we have to. We tried the Georgia Dream. I wrote umpteen letters about what the problems with Georgia Dream was. Georgia Dream works through a bank and it has to be a local bank certified by DCA to work on Georgia Dream. The local bank gives it to the junior officer. The junior office job depends on how many good loans they make. They get a Georgia Dream loan and somebody's margin. What is the easiest thing for him to right on that thing? Get a rubber stamp and boom next person.

Comment 104: I would like to add that I can really say this as a living testimonial. You know hard work always pays off and I remember her when she came to Seminole County and we don't have in Donaldsonville. We really don't have very many apartment areas or whatever, but Ms. Barr did come into the city and she spoke to the city council and to everybody that and you know present what she would like to have taken place in Donaldsonville and by her coming in contact with these politicians and the community, the people in the community, I mean she was active doing every part to reach out. You do have to work hard on these rural areas. She did that and I can say that we do have in Donaldsonville that we have a nice

complex apartment area where it is nice and clean and just what she presented. I do give her the thanks for it and coming to our area. It was a hard job that she had to do because she had to get involved not only with the politicians, but the community, chamber of commerce, everybody to get that and come inside Donaldsonville.

Comment 105: As a grass roots. Grass roots are no longer valid by the state. That is all I have to say.

Comment 106: It is sad though that she can go there and 30 miles away can't come. It is politics and race.

(Inaudible)

Comment 107: She did that job and she did the process and that is what I was trying to inform everyone. Anytime you need to get something done it can't just be that department. You have to expose yourself to everybody in the community, the surrounding areas as well to hear what you are trying to present and help in that community. It is our job.

Rob Gaudin: Let me conclude by saying your comment whether good or bad will be transferred to DCA. It will not be filtered or anything like that. So I am just the messenger. The person that I report to will get this information. She will have transcripts, she will have written documentation of what was said at these meetings. Southern Georgia has been and you are not alone. The other part of Southern Georgia that I went to had the same feelings that they were being kind of left out. I will share that with them. The rural areas have some real challenges. That is my conclusion in general, not in specifics. I appreciate your comments. So thank you very much for coming.

APPENDIX H. MINUTES FROM 2015 CARROLLTON FAIR HOUSING FORUM

Comment 1: I experienced it a lot in New York; Washington.

Rob Gaudin: Yes.

(Presentation)

Comment 2: I am with DCA and more single females apply for the loans than single males. So that could be more applications. We also finance a lot more single females than we do males.

Rob Gaudin: This is how many were denied out of all of them from whatever source and not just DCA, but across the entire market place.

(Presentation)

Comment 3: Oh you mean when we just submit it that is the amount of responses we had?

Rob Gaudin: It has been 46 for the last 2 or 3 weeks. I'll check it again tonight and I am sure it is still 46.

(Laughter)

Rob Gaudin: If not, then it will be fixed.

(Presentation)

Comment 4: We have more homebuyer agencies than that and they all received it so why didn't they come do it?

Rob Gaudin: I have looked at the responses and there is a field at the end of the survey that asks them to please include your name and your agency and so on. The only people who have replied are from a few grantees and a few housing Authorities who may have been involved in some outreach committee webinars that we had early on the process. So that is it. So I am not sure what is going on.

(Presentation)

Comment 5: I am thinking and I am trying to remember what it looks like when it went out?

Rob Gaudin: It is an online survey.

Comment 6: I know it is, but if we just sent a link and maybe there had to be words in the thing that said to take the survey.

Rob Gaudin: I have seen the folks there say that we have it on our website too. Then I couldn't find it. My staff has been looking for it and they can't find it either.

Comment 7: It says it is a bad link.

Comment 8: It is not coming up.

Comment 9: It is oh bananas we can't find your page. So survey monkey doesn't have it.

Rob Gaudin: It does. Believe me.

Comment 10: I found it. It is there.

Rob Gaudin: So I would encourage you to go and take the survey. Send it to your church goers, your friends. So we can get something a little bit better than 46.

(Presentation)

Comment 11: Did they send out the announcement more than one time to the same groups or do you know any of that kind of thing. I am wondering if we sent it one time and you know people have to see things over and over to see it. I am just curious.

Rob Gaudin: Usually you send it out and then a little period of time later you send out a reminder. I haven't gotten any correspondence and I don't know if this constant contact list has any names in it or anything. I haven't gotten any corresponded from anyone going what is this?

Comment 12: We have multiple lists like that. I have the one that has lenders, realtors, and home buyer info.

Rob Gaudin: Just send it them.

Comment 13: We did that. That is why I am wondering why they didn't and there is over 4,000 names. So over 4,000 people got the initial thing. There would be another list that each department has their own constant contact.

Rob Gaudin: Do you know personally that 5,000 people got it?

Comment 14: I know it went to their inbox.

Rob Gaudin: You know that it went out to their email. Then why don't we have more than 46?

Comment 15: That is why I am asking you, should we have sent it more than once? You know how in advertising they tell you that people don't see things until they are tired of seeing them.

Comment 16: I am wondering if you had some sort of IT mess up. Maybe it didn't actually go out.

Rob Gaudin: I would tend to think that is correct.

Comment 17: I think that maybe you should send it again.

Comment 18: I think so too. I do the Georgia Dream rate sheet, which is out rates and whatever for our lenders every Thursday. As long as you keep the subject line Georgia Dream—something else you are fine, but if you ever change that subject line people's computers will kick it out. It could be that people junked and blocked it. So we need to find out. I know it went out to a lot of people, but what happened. I am going back to look. You can actually open it up and look at constant contact and see how many people received it.

Rob Gaudin: Whatever has happened, something has happened because you are looking pitiful compared to states that are so much smaller.

(Inaudible)

Comment 19: I don't think I have got it so maybe you can send it out to the list of people you invited to this meeting.

Comment 20: That was me. I have never seen a survey.

Rob Gaudin: If your contact information is in the sign-up sheet, particularly your email, you will get everything.

Comment 21: You will send it to us, because I couldn't get to it from what you had up there. If you send it to us, I will do the survey.

(Inaudible)

(Presentation)

Comment 22: What is the timeline for your report?

Rob Gaudin: I am supposed to get the draft for internal review back to them in late this summer. I am hoping that I get more responses on the survey and get some more data on the distribution on housing and maybe low-income housing tax credits or HUD so we can put some more maps to that, but pretty soon. Then there will be a public review meeting after the document comes out and so I am not sure. It should be by fall to be completed.

Comment 23: With the email distribution that supposedly went out, do you know if they went to the professionals or did it go to the citizens?

Rob Gaudin: I do not know. The survey is designed to go to stakeholders who I have done surveys of the general population. By and large the general population doesn't know anything about this stuff. Stakeholders at least have some basic understanding or if they don't then we know that. If they don't have some basic understanding then we need to do some outreach to our stakeholders, but generally speaking we are trying to get a hold of the stakeholders and get them to participate. Typically that is an email list and as you suggest your agency has email lists for your lenders.

Comment 24: Well and you would have and I have communicated with lenders, realtors, homebuyer people, and the public. The public is free to sign up to receive our weekly email list. There would be another group, the low-income tax credit group would have a list of developers and city and community leaders, they would have received it. Chip would have city and local governments and they would have received it. There is all kinds of batches of people and we sent them to all of the contacts. Everyone that had a constant contact list sent this thing out. So my group alone is 4,000.

Rob Gaudin: I think this young woman over here said it correct when she said that there is something in the system that went wrong.

Comment 25: Your subject line maybe.

Comment 26: That is why I am going to go back and look to see if the subject line blocked it.

Comment 27: Georgia was one of the strongest hit in the recession. Are you factoring that in? Several of your slides actually show that 2010 and 2011 dip. Is that a part of your analysis as well? We lost five banks just in this one town.

Rob Gaudin: Five banks in this one county. Probably shouldn't...what were they doing with their lending?

Comment 28: Exactly. That is why you see that peak of 06 and 07 then that strong dip.

Comment 29: Then about ten banks have moved here since then to Georgia.

Comment 30: To Georgia yes, but not to this region.

Comment 31: To right here maybe not, but ten in Georgia.

Comment 32: That is in the entire south.

Comment 33: To Atlanta to do...

Rob Gaudin: I can tell you the names of the banks that did everything. It is all in the data piece.

Comment 34: It is a larger problem. One of the things that I would say and I cannot and I will not make an assessment of anybody else, but just general good research, primary and secondary research in conducting surveys, the stakeholders often are going to give you very skewed information, because they do not want their industry to take a hit. The other thing is if you are talking about the general public people who are and I call them stakeholders also because they are paying rent to the landlords and the mortgage companies, they are the ones who should be answering some of this survey. You are not going to get a realtor who is making money in like Coldwell Banker or Wells Fargo who is a bank or Bank of America and their entities to give you the facts of what they have to report to FCC. The people who really need to tell you what the problems are, what is discriminatory, what they feel of the services being provided are not being approached. The people who live in public housing, who live in the rental apartments, when the mortgage burst came in 2006 and 2008. There was a huge mortgage problem with the failing of the housing industry. So you have people there who would be able to say I took a balloon mortgage not knowing that I had an exorbitant rate on mortgage. I bought a two family house where one part of it is rental and one part of it is owner occupied. When the mortgage burst came and then those are problems and some of the same problems you listed there are the problems that people had such as discriminatory practices, high income, low-income, the skewed way they do the FICA and so those are the kinds of things that hinder both African Americans, Hispanics, non-Hispanics, poor whites and the native Indians, the entire list that you have there. So in order for us to have a good survey of what practices those are, you need to get it to the Joe Blow public. The people who live in these houses, who rent public housing, are renting from landlords who have shacks that they are renting. Those are the people who you need to get to reach to get a fair report to HUD. I can see where it is going now. Georgia and I saw something from 2008 that was totally skewed, but anyway it didn't tell the truth the Analysis of Impediments and people who go to the Housing Authority and pay their rent once a month if you gave them a survey, 78 percent of them are going to respond. If you sent a survey and not to discredit the lenders, but the lenders want to make sure that they maintain a lot of their clout with the people. That they keep their numbers up so they might not do it on the first and third quarter, but the second and fourth quarter will show you totally different numbers on how many banks failed because of

the poor bundling or mortgages. People couldn't even find who owned their mortgages. So the mortgage industry took a heavy hit. Those of us, the real estate agents knew and property management knew that there was something happening. If you took a mortgage out and you had a mortgage that you didn't pay or you couldn't afford to pay because of the balloon element. Then you went to look for your original mortgage and your mortgage was separated into four or five pieces with four or five other mortgages which they call bundling and therefore you have that discriminatory practice going back to where you are as well as financial. As fast as people were losing jobs they were losing their houses. So all of those things will connect to say OK what is A1 doing, HUD, Fannie Mae, they all took a hit because nobody was watching the shop.

Rob Gaudin: That is correct.

Comment 35: It would be good to reach people at that level, but how do you do that? How do you get people to respond? You could get every Housing Authority Director to conduct the surveys that would be a good thing. A lot of people and when I say lenders and realtors that is just the pocket group that I deal directly with, we also work every day with city and county leaders all over the state and we have a program called Georgia Initiative For Community Housing, where we meet with these people over a three year period and help them to address housing needs. So all of those people would be people who would have received the survey too. They know firsthand in cities and counties in South Georgia where the rentals are 70 percent rental compared to 30 percent homeownership. It is not unusual to find that in the South Georgia area so those surveys did go out to those people who are on the ground everyday trying to put people in housing, trying to enforce their codes and make people clean up that dilapidated rental and bring in some new low-income tax credit properties. So we also work with all of those people every day and you can get those maps for low-income tax credit where they are located in the state. I can get some.

Comment 36: What is the name of the organization again?

Comment 37: I am with the Georgia Department of Community Affairs.

Comment 38: I know you are, but the Georgia Initiative for?

Comment 39: Oh, Georgia Initiative for Community Housing is a group that we the Georgia Municipal Association and DCA partner for this program. We have 55 communities in the state go through it already, so it is almost time to apply to do that again. So Carrollton had a group of people who were interesting in housing and how would you make a change in Carrollton? We could have somebody come out and talk to a group and say here is how you put these folks together and get together to talk about improving housing.

Comment 40: What about the county?

Comment 41: There are a lot of things that people do not see because they are not out there on the ground, but it is happening.

Comment 42: In the county right? Who would you contact?

Comment 43: You could contact us and we would be glad to come out and talk to you. It is available to any county and any city government or county government. Most people come in

as cities, because you are working with a small group that is manageable. Some come in as a whole county like Liberty County just came in as the whole county together.

Comment 44: Could d you go back to your information?

Comment 45: I guess we get a lot of calls at the Housing Authority. Rent is so expensive now for most people and especially if you have a big family and they sometimes they don't have any credit or they have hospital bills and they don't pay them and with the recession, the crash, the mortgage industry, people are struggling and they are still struggling to get back to some level of not even property, you know. So they can't get a mortgage loan. They have to rent from slumlords who do not fix the properties and really they have no knowledge about where to go to say look, like I don't have running water and the ceiling is falling in. They don't have that kind of knowledge and they don't know who to go to. They call us. They can't rent a better property because their credit will be checked and they will be denied. It is just a horrible horrible and you know and I don't know what we can do.

Comment 46: I think education is the first thing and that is what we find in this community. If you can start bringing people in for housing fairs and information fairs and say did you know you might be able to own a home. Some people don't that they can or you don't have to live in that shack. There are ways to encourage those people and encourage to bring in some more housing.

Comment 47: I do that with NSP.

Comment 48: People come in who don't have any credit or they have...

Comment 49: Then they have to learn what to do.

Comment 50: Those people have to have homes too. They have children. I have 800 homeless children in Carroll County whose parents can't provide them a place to live and sometimes their parents have felonies and their parents don't have credit, but those kids still need a place to live. That is the tough thing. Had those things you address that people don't realize is if I was a developer and I built a property who am I going to rent too. Am I going to rent to them that are not sure they are going to pay or am I going to rent to a person who may be a danger to the people next door. How do we house those people. We have another initiative at DCA just about that Rapid Reentry Program going on now to house people who are coming out of prison who have not have found places to live. It is endless the problem with housing.

Comment 51: I say to myself I have kids that live on campus at the college and would I want a felon moving in to those apartments?

Comment 52: They are low-income, but you know. I don't know.

(Inaudible)

Comment 53: I was hoping you would flip back on that chart where you have some of the areas where there are the most effected the very top. I found in limited state level...they are not developing in certain counties here in Georgia the local jurisdictions are not developing their fair housing ordinances and I don't want to misquote, but I was reading when I was trying to get through this 2008 package where recently Georgia rewrote or declined the ordinance that will make it necessary for developers to maintain properties for senior citizens. They call it the

55 group. So that in itself is going to be another discriminatory practice because Georgia according to my last research had 26 percent people over 55 and who made less than 80,00 a year. That is another one of the things that we have seen. The way people and what is affordable now? What is the median income now. So what is affordable? No one is able to say what is affordable? What number are they talking about?

Comment 54: It is 30 percent.

Comment 55: It is 30 percent of your income is the amount you should pay for rent, but what is affordable not to me or to somebody else. What number is the federal, city, and state government using as what is affordable? Not how much I make. I know they say 30 percent of your salary should go for rent, but people are paying 50 and 55 percent now. What I am asking is this. They must set a standard number dollar amount that is affordable. If I make \$100,000 a year, yes I can afford to pay some rent, but what is the standard number? What is considered affordable housing? Is it \$250,000 house or a \$60,000 house? What does the government use as their affordable criteria? So we are building affordable housing what is the price?

Comment 56: They go by the area median income per county. It is listed.

Comment 57: We are part of metro Atlanta, Carroll County. We don't...

Comment 58: So how can you say...

Comment 59: Exactly.

Comment 60: This here is part of Atlanta and it is spreading now. What is affordable? If I want to develop some housing now and what can I call affordable? I am building affordable housing. What would HUD expect under their income.

Comment 61: For tax credit and I am on the tax credit side and you can speak for tax-credit. They have a standard and I don't know exactly what it is that they go by that is affordable. You can think about it as, really it is the working class affordable and then HUD developed properties that is really based on your income like the 202 senior high rises and based on your income properties.

Comment 62: Income based.

Comment 63: Those are the 30 percent.

Comment 64: But those are so limited.

Comment 65: Those are very limited. So to counter act the waiting list that people were experiencing, the obstacles, the IRS decided to develop housing and that is what they call affordable housing. So it is not higher than the market like you might go to some place and the rent is \$1,500. So affordable to them is lower than the market-rate. There is an industry standard that they go by which is the median income for the area.

Comment 66: For that particular area.

Comment 67: So that is how they decide what is affordable.

Comment 68: We have the low-income housing tax credits that you are talking about. The developer gets credits from the IRS to encourage to build those properties based on the amount

of money they get they have to keep a certain number of those units affordable for 30 years. So there are basis and there are guidelines for that and it is all going to be based on where you live. If you go down to Blakely Georgia it is going to be different than Carroll County or elsewhere.

Comment 69: So then maybe what one of the impediments would be is there is not being enough housing built that is affordable for the population.

Comment 70: That is true. Right now since the foreclosure crisis, it is a bigger crisis than you even know, because a lot of people who owned didn't pay on it so now they are in red. I think Carroll County and some of those surrounding counties shouldn't be in that Atlanta area because if HUD says to Section 8 you have to pay a \$1,000 a month of this property because this is the average it is going to drop...

Comment 71: All of the surrounding areas and then you can't afford, but I am not from Carroll County. I am from Treutlen County.

Rob Gaudin: I do want to emphasize the definition of an impediments is how the protected classes are affected, action, omission, or decision that restricts housing choice due to protected class. It is whether how much the house cost.

Comment 72: Do you believe that?

Rob Gaudin: I am just saying that is the definition.

Comment 73: Are we dealing with the real or are we dealing with theory? Theory or are we dealing with practical applications? Which one? I know you are just doing the survey?

(Laughter)

Comment 74: I know it seems like to a lot of people that nobody is doing anything and you would be surprised how much is going on every day. You can't catch up.

Comment 75: Because you didn't get a high number of responses for this analysis when you go back and do your analysis. What is the consequence for DCA or Georgia for not promoting?

Rob Gaudin: I haven't made up my mind. I might just use neighboring state experience in neighboring states.

Comment 76: You were elected to do Georgia for some higher entity?

Rob Gaudin: I bid on the job and we were awarded the job. The reason we can't survey everyone is because it is extremely costly. So we try to cut corners and bid this so we were the successful bidder.

Comment 77: You can hire me to do it here.

(Laughter)

Rob Gaudin: If the DCA would be willing to promote that, I am sure that we could figure out a way.

Comment 78: You could get a Census going.

Comment 79: I was like you don't get the answers. You do the round. You go to Rome. I saw some advertisements where you are going to be in Rome and Albany Georgia and South Georgia. So what happens if you do not get the response you need, what is the consequence.

Comment 80: Report card of sorts.

Comment 81: What is HUD going to do?

Rob Gaudin: The consequence I haven't ever had this happen, such low participation. It has never happened, in 20 years of doing this study, it has never happened. So I am thinking that from now, and the end, that participation will come up. You just start making noise.

Comment 82: When did this start?

Rob Gaudin: Early this year.

Comment 83: Your seminars, is this the first one this week?

Rob Gaudin: This is the first one.

Comment 84: So is it going to be doing about six of these this week and by the time that those are done, go back and you tell a few people...

Comment 85: Just send it to everybody on our email list.

APPENDIX I. MINUTES FROM 2015 DALTON FAIR HOUSING FORUM

Comment 1: Our County is the one that went from green to aqua in the slide. The northwest corner. If you looked at ten years before that it would have been yellow.

Rob Gaudin: I believe you. This particular population is growing very quickly throughout the US and not just here.

(Presentation)

Comment 2: We change colors in this one too.

(Presentation)

Comment 3: It is probably single family households, female headed households.

Rob Gaudin: There are a lot of reasons and that could certainly be it.

(Presentation)

Comment 4: We know who they are too, we see their mortgages.

(Presentation)

Comment 5: I would like to comment on that. As you are aware the City of Dalton is doing surveys and I know that half of the people here are service providers and they do it by client basis. Some things we do and somethings we didn't know. So we have been having some focus groups telling the data. One thing that we already knew is that when people come to us and discuss their housing problem, we know that they feel like they have been mistreated, but they are very surprised when we tell them that they have been discriminated against and that is against the law. We are finding that about 1 out of 25 is willing to file a complaint. They are willing to have us help them resolve the issue and the largest percentage of those that don't want to file a complaint are Hispanic. Anybody else want to comment on that? They want somebody to help them, but they are intimidated by the whole process and as I said most of them don't even realize that they have actually been discriminated against. They are like they have been treated bad, but until we tell them they don't realize they have been and it is against the law.

Rob Gaudin: I agree that the use of the fair housing system would be increased if people knew about fair housing law as well as where to go to file a complaint.

(Presentation)

Comment 6: Well it has even changed if you look at where it was so high and then when it went down. The general public used to be able to go to the Attorney General's office and actually file a fair housing complaint and now the process statewide has changed.

Rob Gaudin: The door has slammed shut.

(Presentation)

Comment 7: If I am not mistaken took it out of the way it was structured before through the Attorney General's office. You can't do that anymore.

Rob Gaudin: That is correct. They were once a substantially equivalent agency under contract to HUD as a FHAP. Fair Housing Assistance Program participant, but in 2012 it became official that they were no longer there, because they were not doing their duty. They were reviewed by HUD and their 2011 looks terrible and they were cut off.

Comment 8: We have actually done so, it is to help people to file complaints and learn to do it all over again. What we used to do, you were getting assistance and were getting resolutions.

Rob Gaudin: What was once and still not really, well working, is not there at all.

(Presentation)

Comment 9: As you and I discussed when we had the focus group in Atlanta, the service providers would love to do it and they will do it. They are trying to get their clients to do it and access the internet with their phone which is why we are doing it on paper.

Rob Gaudin: That is fine.

Comment 10: Or you can't do it but once on the computer.

Comment 11: We thought about actually having with laptops and bring people in, but once you have done it you have already filled out the survey and thank you very much.

Rob Gaudin: I can make a change to make that happen.

Comment 12: We have a community center that has a computer bank here for low-income households and part of it is income too. The very low-income households they don't have computers and as I said they use their phone. Most places too and not here, but at the library they time you out after 30 minutes and they will be so slow to do stuff that they will get timed out and they can't finish it.

Rob Gaudin: It should take 10 minutes.

Comment 13: Not with our Spanish speakers. No sir.

Rob Gaudin: There is a Spanish version.

Comment 14: It is sort of not colloquial Spanish. It is very formula.

Comment 15: They have very low income and literacy level in both languages.

Rob Gaudin: Do the best that you can with it.

(Presentation)

Comment 16: We already have more than 46 so we will know that we will beat that.

Rob Gaudin: We just need to get those entered, right?

Comment 17: When you talk about a date and everything goes to her first to compile it for the city and then we will turn it over to you to enter it for you.

Rob Gaudin: If you enter something by the end and put in your city and say entered by Dalton, I will separate and tabulate those results.

Comment 18: That would be fabulous.

Comment 19: We will get that done for you.

Comment 20: I actually sent the link to the board of realtors and asked them to share it with the members just so we could try to get a broader spectrum.

Rob Gaudin: That would be great if we could get everybody who is around the housing table. Not just one side with consumers, not just the side with realtors or property managers, but everybody and get all the opinions out.

Comment 21: Housing Stability Coalition and the service providers are all going to do the survey.

Comment 22: I said it was the clients who had to do those by hand, because it was just a lot more difficult to get it accomplished.

Rob Gaudin: If you could have all of that done by the middle of next month that would be great, Mid-July. I will need to get the draft for internal review to DCA by August 1st. It will give me a little time to run the numbers, so that would be great. That would be excellent.

(Presentation)

Comment 23: What about credit scores, because that is something, she went to the Consumer Federal the newly created and she went to a meeting yesterday and some of the things that we are finding, and she said that a lot of people talked about this yesterday, is that they were foreclosed upon and they have to work that out with the bank. They are saying that they are working it out and they are just now adding it to their credit scores and they are just dropping like a rock. They are adding and now they have a modification. When they were behind they didn't put it on their credit score, they are adding it now.

Rob Gaudin: It is a very challenging problem.

(Presentation)

Comment 24: Just because of the low-income tax credit the points you are allowed for public transportation the rural area will lose by one point. It is because the rural areas do not have and they have on demand. They have on call. That is all that they have. So we have trouble accessing what they state has to offer for incentives.

(Presentation)

Comment 25: The one we were talking about yesterday it is discrimination of religion. Would you please discuss that one, because I think it is becoming more and more prevalent. The one where they were single and they couldn't have...

Comment 26: Yes, there was some, a client that we had served through Salvation Army where I work and we have helped with something else. They have lived in a shelter in years past and they had identified housing and they moved into that housing had another child. She had another child and was divorced. Brought a lease to me, the lease agreement very unusual and

it had specifications about the landlord being able to come in at any time without notice. If you are a single female renting this unit or a single male renting this unit you are not allowed to have overnight visitors. It was owned by a church.

Comment 27: It does happen a lot.

Comment 28: It wasn't privately owned. It was owned by a church. It wasn't a shelter. It was a private rental and it had six units here in the city of Dalton. A very unusual lease agreement. I advised her to seek other housing and not sign the lease agreement and to take it possibly to legal services if she wanted to look it over since Georgia legal services does assist with some housing issues. At least they could advise her correctly on the legal issues.

Comment 29: She said in the past week she has had four clients have the same thing.

Comment 30: The rental rate is lower. It is lower rent, but the agreements are just ridiculous of what the landlord assumes that they have the right to do or not do. You are paying to live there. It was owned by clergy. It was owned by a church and there are quite a few that are privately owned by churches. They have very different policies as far as what they will allow for tenants to do or not do as if they were in some type of a program.

Comment 31: Something else, I think you talked about this earlier when you looked at the Census for 2010 for the city of Dalton, we got the disproportionate percentage. In the city it is disproportionate with Hispanics paying 50 percent or more of their income towards housing and then 50 percent or more living in substandard housing. The great immigration, the largest percent of it occurred about 15 years ago average. Some more or some a little less and we have been doing these focus groups and finding out that an established immigrant population not understanding the local housing market either on rental or we say a predatory loan products. We saw all of the financial mistakes anybody could make and it was paying too much for your housing and not knowing the landlords are required to make repairs and so on and so forth. So it was just not being familiar with the laws here. Now we are learning and I have been working with, there is an innovative high school and it is 90 percent Spanish speakers. They average 50 to 60 new students every fall, August that move there over the summer from Mexico or somewhere in Latin America. We speak to them and we are talking about some of the things that occur without knowledge about the housing market and all the mistakes that can occur if you don't have a good financial literacy background. I was giving examples and there were ten students that were interviewing us and by the time that we left half of them had asked for a card because it is not OK to pay 50 percent or more of your income. Oh, you mean the landlords have to fix it. They were asking for cards for their parents. They are making the same mistakes that happened in mass 15 years ago, just because they are unaware of paying too much for rent. They are paying too much for purchase because they don't know the value. Of course there are title loans. They are making all of the mistakes over again that the established population and the children of the ones that moved here 15 to 20 years ago, of course they grew up here, they are familiar with it,. But the new groups that come here every year are making exactly the same things.

Rob Gaudin: Outreach and education is an ongoing challenge to continue to reach new comers.

Comment 32: We want to target that. I was just saying that I didn't realize that the percentage was so high and we have learned that they are doing exactly the same things.

Rob Gaudin: They are new comers to the country and we need to teach them about credit and how it works.

Comment 33: They are being taken advantage of because they don't understand.

Comment 34: It isn't just them.

(Inaudible)

Comment 35: They don't know that they are required to do repairs and they are stuck. They feel that they are stuck where they are at. They pay \$200 or \$300 a month for a trailer that has holes in the floor, but their power bill maybe \$500. So they become homeless because of the or powerless and they have to choose do I pay my rent or do I pay my power bill.

Comment 36: By definition, if you don't have power you are in the definition of homeless.

Comment 37: Substandard.

Comment 38: They go and live with their family member and go sleep on their couch, they are not considered homeless.

Rob Gaudin: What we are trying to do is this and makes some head way with the variety of problems.

Comment 39: There are so many. I call them slumlords, they are making tons in this area where people on fixed income live and they feel like they have no choice because ...

Comment 40: Subsidized housing.

Rob Gaudin: Your political leadership if they have the wherewithal they can pass rental standards and have rental inspections.

Comment 41: If we know about it and they come to us they won't address it, but we will.

Comment 42: A lot of them don't know they don't have to put up with that.

Comment 43: On the other hand you do get a lot of people that they chose not to. They chose not to do it. They think that because there is housing there that everything should be paid for too.

(Inaudible)

Comment 44: People that can afford it and they think that there is no match out there for them to go to because all the housing places are really full of people with the same issues or with the same income. There is only so many units you have and there are other people that are demanding because they think that they should.

(Inaudible)

Comment 45: You are a housing authority and they assume that you have vouchers, but you don't. So that is another whole cup of tea. This county has the lowest number of tenant based vouchers of the six counties and we have the highest population.

Comment 46: That is true.

Comment 47: Another issue that when you educate someone about what they can do about the issues they are having with housing they also have to be educated about the consequences of what could happen when they do go out and really just voice their opinion or showing that they have a right to this or a right to that once they are educated. I have had several that were evicted. Then basically what happened was the place was condemned by the building inspector.

Comment 48: You call building inspections and you drive out.

Comment 49: They have to leave and they have to go somewhere and the housing is not provided and then maybe sometimes the landlords get a certain amount of time that they can make the repairs, but meanwhile that person is just homeless. Just out and so sometimes when they get informed about what their rights are that is a fear that they have is I know that I am not going to have anywhere to go. So that is why I don't want to say anything.

Comment 50: Then they don't have the resources to appropriately enforce their rights is another problem. Getting a management report is still 90 bucks. You may get it back and you might not.

Comment 51: Even if that happens in the time frame that collapses between when you have to leave the premises and it being resolved where are you going to be. What about your things? They are still in the property. It is an ongoing issue.

Rob Gaudin: I agree there are challenges ahead. So the question we still need to address is what we are going to do about it. We meaning at DCA. DCA needs to do something about these public and private sector impediments. They need to take action. That is what we say here and get a memo out here in not too long that will talk about these private sector and public sector impediments. If we have missed something, please tell me. It is kind of what these are for, is to get your commentary about these impediments, because they are the ones that have to take responsibility, that agency.

Comment 52: I think regarding the national origin discrimination most of it is and particularly Spanish in this area not having much access is a problem.

Comment 53: Of course anybody can get at our office the Housing Authority and we know that we are required by law to have based on the people that we must have everything in English and Spanish. The private sector doesn't have a clue and the Latino population that are signing those leases and they have no idea what is in that lease and they don't realize it until they come and see us, but I can't get them unless it is something that I can address I can't get them to file a complaint.

Comment 54: Not everybody read documents they sign even when it is in their first language.

Comment 55: They give a low literacy level it doesn't matter. I remember telling people going into my first mortgage signing, and I managed to look like I understood what the lawyer was saying but I have to tell you I turned to my husband and said what the Heck?

Comment 56: Most people who are going to sign a lease needed housing four days ago. So they don't even care what it said. They just sign it.

Comment 57: Just give me...

Rob Gaudin: A place to stay.

Comment 58: In rural areas and in metro areas you don't have a place to stay there is a shelter with a large number of beds for you to go to. In rural areas I mean for women and children there is nothing unless you were a victim of domestic violence. If you are a single male it is like 35 or 40 beds?

Comment 59: For single women and single men unaccompanied only.

Comment 60: So if you have children and you are not a victim of domestic violence there is no place. Rural areas don't have shelters so it becomes a major issue and they end up in housing situations that aren't the best situation because they are desperate. It is either that or just sleep in the car. If they have kids they don't want to sleep in the car because somebody might take their kids away.

Comment 61: That is a lot of fear.

Rob Gaudin: We kind of steered the discussion off into challenges associated with being at-risk or being homeless and that is another family of housing choices or lack of choices or lack of availability. Those are challenges that are faced in conducting your Consolidated Plan. Where do you fit in the COC and this particular study is actually more about trying to find the challenges you face and choosing your home. So in some ways they overlap and in many ways they do not.

APPENDIX J. MINUTES FROM 2015 HINESVILLE FAIR HOUSING FORUM

Comment 1: Now we talked about the loans. Are those only banks that are in state or is that nationwide?

Rob Gaudin: It doesn't matter where they are.

(Presentation)

Comment 2: I am with JCVision and Associates and EOC and I think one of the issues that you stated was the competitiveness of grants and depending on some of the competition requirements and one of the things that we were looking at was becoming a FHAP with some mentorship and right now with EOC not being able to be that mentor that is where the struggle comes in. So I think that right there is an impediment.

Rob Gaudin: That is correct.

(Presentation)

Comment 3: Well I will fill out these forms. I believe I heard that you sent out emails. Fifty percent of the population that I deal with do not have internet. Is this a form that can be printed out so when they come to the office to fill it out? Can we scan this in? Does this all have to be done?

Rob Gaudin: When people come in have them open it and take the survey right there, because if they are confused you can help them. There are yes, no, don't know and just checks don't know if they don't know. That would be totally fine. It needs to go on the electronic database because then I can download the whole thing and analysis it.

Comment 4: (Inaudible) You can text the link too.

Rob Gaudin: I am sorry?

Comment 5: Text the link to a cell phone or a smart phone.

Rob Gaudin: Do you want me to text it?

Comment 6: I am saying that that is an option too if they don't have email to text the link to a smart phone.

Rob Gaudin: Oh, that is true. Although at one of our Fair Housing Forums somebody had it on their phone and they said that this doesn't exist. There is something about the texting. You have to be careful.

(Presentation)

Comment 7: When is the deadline?

Rob Gaudin: The deadline I would say is probably mid-July, but if I can collect all of these emails I will send you the link and I will send you a reminder in mid-July.

Comment 8: I hear you say (Inaudible) can you just tell us some more stuff that you have done to get these surveys done other than emails? Is that it?

Rob Gaudin: My scope of work is designed so that it is least costly for the state. So the state needed to do some things. I am not sure what they have done. They have advertised at the presentations. I guess this is the presentation. They have posted it on their website, but I am not sure what else they have done. They have another and they have created another survey for the consumers and it is also on their website, but beyond that I do not know.

Comment 9: It just seems like a lack of ability of the state to integrate. We are talking about fair housing in a state where fair housing is an issue and we have 46, but we don't have a grassroots effort to obtain this information particularly from the consumer themselves and we have a deadline in the middle of next month to increase it.

Rob Gaudin: The middle of next month means that by August 1st I get the draft for internal review document. As a practical matter I always leave this survey open. I run the tables again for the draft for public review and that goes out. I make a presentation during that period. Then I run the tables again and I am constantly checking to see how many. So I think you are right. That grassroots thing, I am not sure how that is working out.

Comment 10: We are talking about people who don't have access to email. Who don't have the ability to go in and they don't have that stuff. So if you want to obtain information that is going to be more effective and it is going to affect their social economic area we have to do grassroots. When we are talking about seniors, minorities it is not about color. The possibility for them to have Wi-Fi computers is not real good. So we have to get something that is going to be more feasible. So sometimes doing a grassroots effort we take a pencil and pen and we provide churches and other people and we get them more involved.

Rob Gaudin: Just like this gentleman over here. If you would like to be sent a copy a PDF of the survey I would be more than happy to send it to you.

Comment 11: I would like for you to come.

Rob Gaudin: I would be happy to do that as well.

Comment 12: Have you thought about mail surveys?

Rob Gaudin: Those are also very difficult to do a statically based survey. When you are doing that kind of a survey people want to know of the population and how did you draw your sample and this is not a statically based survey. I am not drawing a sample. It is self-biased. It is drawing itself. The same as these gentlemen here there is some bias in that sample, but I am not concerned about it. If we do a mail survey and go to that expense then people want to know how you got that sample.

Comment 13: Where are we to find this? Is this through the chamber? Is this through DCA? Where do we find these surveys?

Rob Gaudin: This should be a link sent to you.

Comment 14: I mean if I am a person who is in the entitlement area and I don't come to this meeting because I think most people who probably meet that requirement are probably hopefully working somewhere so they can't be here now. So my question is again, where do you find out about the surveys? That is the problem there.

Rob Gaudin: The scope of work and I try to compete with other vendors and my method there was to have DCA do the legwork. What they have done is post it on their website. It says and I actually found it last night. It says tell us what you think about fair housing. You don't know that that is a link until you put your cursor over it. It is right on their first page. It comes up and you click on that and there is another discussion and then there are two surveys. This one and a consumer survey. I don't know anything about the consumer survey, but this is the one that I think we should do, but that is just me.

Comment 15: That is the disconnect. So most of us are not tech savvy at all, but I will fiddle around till I find what I am looking for. I have internet, but the elderly seniors.

Rob Gaudin: I agree 100 percent. There are many clients that we have that want a paper copy and then they can hand it out wherever they want. Then we just figure out how to get it typed in. I am totally good with that. No problem. If you all want the PDF sent to you, I am great with that too.

Comment 16: I think one of the suggestions because this looks like another impediment. As a housing counseling agency I didn't even know about that and I think that says and we were all together last week across the state in Atlanta.

Rob Gaudin: I don't know what is going on with DCA constant contact, but everyone at every one of the meetings, and this is the fifth of six had exactly said that, they didn't know this was available.

Comment 17: It is kind of a shame that DCA didn't do anything with social media with either twitter or Facebook. A lot of us are not going to DCA everyday looking for different surveys out there.

Comment 18: Also press releases to the major news organizations.

Comment 19: They really missed an opportunity to get their survey out there.

Rob Gaudin: It is not over. They haven't missed it yet. It is not over. I am recording your comments and a transcript will be prepared to prove DCA with that input.

Comment 20: I am with DCA too and some of you know me because I attend Homeless Coalition meetings or visit around the region. But I was in Athens for this meeting last night and this came up and wasn't really aware of the survey either. Even though I have seen on our website the little line that says tell us about fair housing. I never tried to click on it so now I know to click on it, but any of you who are on my mailing list who have heard from me by email I will be forwarding and he will be forwarding it to you and I will be forwarding it. In fact last night I received an email from our office of housing and finance because we have a constant contact list for that and they sent me the link to the survey. So we are sending it to various groups.

Rob Gaudin: I think that the word is getting out finally.

Comment 21: And encourage them to use their agencies to get their clients to fill it out.

Comment 22: You might send it out to the family connection coordinators.

Comment 23: I sent a media notice to everyone that I could think of when I heard about this meeting last week.

Rob Gaudin: I think it is really going to be through our efforts that this happens. If you could, I would greatly appreciate it.

Comment 24: Are we sending these types of surveys to military garrisons because they are the ones that have the disability coming back from the war and everything and they are the ones that are facing these types of impediments.

Rob Gaudin: In my opinion I want everybody around the table whether you are a banker, realtor, homeless, or whatever. I want everybody around the table so we can get all of the opinions that we can involve.

Comment 25: So could we forward it to other agencies that we know that could participate too?

Rob Gaudin: Absolutely. Faith based organizations definitely, whatever that would be really great. As you can see we have next to no information. I am not happy about this, but it is what it is and I am appealing to you all to help.

Comment 26: Which office in DCA is responsible for sharing information?

Rob Gaudin: I am sorry.

Comment 27: I don't know which office sent this. (Inaudible) I don't know that if her office would have. Someone in the housing division, seriously I don't really know which of our offices is coordinating this.

Rob Gaudin: Two people that I have worked with on this are Antonette, Director of Legal Services and December Thompson.

Comment 28: Right, who is with Christy Fletcher. You know what, as always look to your DCA, if you know someone at the DCA office go to whoever you know to find out things. Like she said I am a resource. Anyone who you know. That is how we really operate. It doesn't matter where we work if you have a question just come to who you know and we will find out for you.

Comment 29: That is my thought too. Even when we send it out if you are just sending out a link it is going to be hard without the background. Some type of fact sheet or news release is going to be important, because even if I am not tied in and I get this email from DCA that says take this survey, it is not going to appeal to me. I am not going to have enough information to share with people. If I get this in my email for the city and some body is telling me to share a survey I am going to need to know why I should send it to my residents and what is the background.

Comment 30: The Office of Housing and Finance, they will email this letter and these are the folks that do tax-credit developments. They have a really nice explanation. So what I am going to do is see if I can get and I will forward this. It is a really good explanation.

Comment 31: OK.

Rob Gaudin: Are we done beating up on DCA now?

Comment 32: We just want to know.

Comment 33: We have questions.

Comment 34: I do have another question. Going back I should have asked. I saw that on one of the slides that you had for refinancing and the numbers that were refinancing. Is there any data to show that there are discriminatory in refinancing? The reason I am asking that is because we do have people that I think one of the big categories was disability. If they are only receiving disability income sometimes lenders do not want to refinance that. So I don't know if that is being captured also it goes back to ownership. We have people that are on social security disability and they want to (inaudible) we give the stuff on house to file a fair housing complaint and they say no because of my type of income.

Rob Gaudin: Right that is, this particular data does not have disability. It has race and ethnicity, but what you are suggesting is source of income protection and that is not protected in this state. It is protected in many places. It would also help if you had a voucher. You couldn't say no because you don't take vouchers as a source of income protection.

Comment 35: But disability income would be protected because the only reason that you get it is because you are disabled.

Rob Gaudin: You are protected if you are disabled, but not your income. I tell you what I will do for everyone. I will add a copy of the survey to this announcement. A physical announcement, a PDF of the survey and then in the announcement the link. Then you can distribute that through your email and then you will have a printed version to distribute, but I urge you and this is really kind of a short survey. Whatever you can get in there that would be great.

(Presentation)

Comment 36: The presentation that you have given us today. At what point have you already sat down with DCA and shared the same concerns with leaders from public and community affairs. Are we receiving this?

Rob Gaudin: The way it is supposed to work is the contract is set by a meeting with them after the last fair housing forum, but we don't have anything scheduled. Then I am supposed to write a progress review memo identifying the preliminary evidence and make some recommendations on actions. I will be doing that and with the caveat we are waiting for additional information from the survey. So it is a little bit of a moving target. So I think we will make an initial statement and evaluate the survey and which you guys are going to produce, hopefully taking the survey and make a larger statement about fair housing. Then we negotiate. I am supposed to get a draft for internal review to them by August the 1st and then I will have a draft for public review by the end of August and a presentation mid-September or earlier.

Comment 37: My concern is the information that you receive from the people the equal opportunity in your presentation; I didn't see other information from Metro Fair Housing and some of the other data. I didn't see that. Why was that only one sector?

Rob Gaudin: Metro Fair Housing they gave it to us a little bit late, but I think we did get some comments. I am only asking for stuff that is readily available. We are all busy. Would you go through these paper records and sometimes that is what it is, but so people and everybody was sent a request.

Comment 38: You said that one slide had also HUD data.

Rob Gaudin: The HUD data with the metro data.

Comment 39: I was looking at the numbers and I was like, I know we as an organization have submitted more than that to HUD. That data, I question the data.

Rob Gaudin: During the time the commission was substantially equivalent should have been the same data, because they are dually filed. Whoever gets the complaints shares it with the other, but I have never seen the dually filled for the substantially equivalent agency. (Inaudible)

Comment 40: What about our clients with a criminal history. Is that included? I have problems with clients with a criminal history getting housing.

Rob Gaudin: Unfortunately they are not protected.

Comment 41: One last thing for me. I agree with this gentleman here with your recommendation that to DCA that I recommend you suggesting getting back to some grass roots entity involvement back in 1999 when Roy Barnes was in office on the side of highway safety and enforcement education. Governor Barnes used grass roots and while we were using those grass roots our seat belt rate went up to 92, 93 percent. When they began to change Governors they did away with grass roots. Our seat belt rate went down to about 59, 60. You are missing the opportunity to get into it and everybody don't see those ads on the television, everybody don't listen to the radios, but they do attend churches, they do attend grocery stores, and they attend community centers. You have to get back to grass roots and if you get back to grass roots that will make this successful.

Rob Gaudin: Thank you for your comment.

Comment 42: Back on I believe slide 24 you were showing housing voucher rates verses the poverty rate. I am assuming that was the 2010 census data.

Rob Gaudin: The 2010, actually you brought up a very good technical point. In 2010 under the Bush administration they did not do what they had previously done in the past four decades. They did what the Constitution required. It was a head count and a house count. There was nothing about income and there was nothing about type of house or do you drive to work or anything like that. That is why we have the 2013 American Community Survey. The American Community Survey is conducted annually. The annual survey is good for communities of 60,000 or more. They do a three year rolling average which is good for communities of 20,000 or more, but we still can't get a Census tract. We have a five year rolling average which is everything that you saw here. So five years ago 2011.12,13 that is the rolling average.

Comment 43: I guess my question goes it changes a little bit being an ACS rep in the 2010 Census, but there was a huge concentration around Atlanta and around most entitlement areas where most housing choice vouchers were being dispersed. I guess I want to know if there is

any research to when DCA has done its last AI study to see if they had the same disbursement of housing choice vouchers as compared to this one to see if they have addressed anything.

Rob Gaudin: I don't believe they have looked at that subject last time. That would be new guidance offered by HUD.

Comment 44: She asked a question about the criminal background and you said that that is not protected here in Georgia.

Rob Gaudin: That is correct.

Comment 45: What state are they protected?

Rob Gaudin: I don't recall anywhere where felons are a protected class, but there are avenues and programs designed to help felons assimilate back into society, but their right and they have lost sometimes the right to vote. So sometimes...

Comment 46: Well they can get the right to vote back. OK.

Rob Gaudin: It is actually a real challenge in this system typo bring someone out of prison and make sure they get back into society. There are definitely challenges.

Comment 47: But it is doable?

Rob Gaudin: It is doable, but a program needs to be set up. Certain landlords need to be taught on how to accept this person.

Comment 48: Which is what we are doing and we need help with that.

Comment 49: I can jump in. The Governor's Office of Transition Supportive Re-Entry has housing coordinators though out the state, like five now. They are supposed to be doubling that staff. I know the guy in Savannah recently attended a homeless coalition meeting and he ensures us the he expects Hinesville to get a coordinator too. This is based on population (Inaudible) and prisoners coming back in large numbers. I don't know if Statesville will get one and other communities might get one, but apparently they are looking at hiring at least five more community coordinators and housing coordinators. There specific job is to educate housing providers for that very reason. So this is a beginning. This is a new program and it just started earlier this year.

Comment 50: I sit on those committees so I know the challenges that you are talking about, but it is doable prior to the returning citizen's initiative. We have had people, a couple of persons who have gone to prison for serious things, but now are voters. It is doable.

APPENDIX K. MINUTES FROM 2015 ROME FAIR HOUSING FORUM

Comment 1: What do you take away from all of the white colors around the metro area of Atlanta? Is white bad?

Rob Gaudin: It is not bad and it is not good. It is a geographic area that an AI has already been done for.

(Presentation)

Comment 2: I have a question on that. When you say, I see the white and black and then you have what you said less than 3 percent of Hispanics. Is that reported Hispanics or you know what I am trying to say, that are legal?

Rob Gaudin: This number doesn't consider their immigration status.

Comment 3: Ok.

Rob Gaudin: It is what their ethnicity is. They can be Hispanic of any race, but in the non-entitlement areas it is 6 percent.

(Presentation)

Comment 4: My question is do you know the answer to why the change in the 2000 to the 2010 for the concentration, the higher concentrations?

Rob Gaudin: I don't know the answer yet. I can't say with any precision certain say take one piece of evidence and say this proves the point. In this type of analysis you get a lot of indirect pointers. People can say that those folks have moved there because they wanted to and not because they were forced to. What we do have is this concentrations increasing for Hispanics and apparently in fewer areas, but persistence in concentrations is also with blacks.

(Presentation)

Comment 5: What do they consider poverty? What income?

Rob Gaudin: That is a national measure. I don't know the precise income number. It varies by geographic area, but it is a basket of goods that the Department of Agriculture has defined and they compare income and it is adjusted for household size.

Comment 6: So like for instance with us here we work on projects for a family of one it is \$27,000 a year. So that would be anything below that is low to moderate income in this area.

Comment 7: That is household?

Comment 8: That is household, but then it doesn't increase very much for a household of two. We get to two and it is \$29,000. So it doesn't, it goes up in very small increments. So say for a household of one could be a little bit further than a household of two at \$29,000.

Rob Gaudin: It is no surprise that people in poverty have struggles all across the board.

(Presentation)

Comment 9: You were explaining the difference and I may have missed it. The Census, the 2010 Census count data consisted of different data collection points than the five-year 2009 through 13.

Rob Gaudin: The 2000 Census actually had two forms. The long form maybe you remember the short form. The long form was a one in six sample which asked questions about your household income and what kind of housing type you lived in and various other types of question like whether you drove to work or what fuel you had to heat your house and so on, but that was the long form that asked those. They didn't do long form in 2010. They just did the short form which is what we have to do by the Constitution, but they quickly realized we still have all of these federal programs that require we have this information. So they began doing the American Community Survey and so that is what has come to be and it is kind of our best indicator of similar data.

Comment 10: So we have apples and apples to the best that we can tell.

Rob Gaudin: I won't confuse you with all of the technical details. It is not precisely the same, but it is close.

(Presentation)

Comment 11: What is DCA doing (inaudible)

Rob Gaudin: I am sorry I didn't hear that.

Comment 12: You see a lot of racial questions for people that have vouchers. I thought that was and the voucher you are using it (Inaudible) you are saying vouchers (Inaudible)

Rob Gaudin: Sometimes the landlords are reluctant to take vouchers so by the way it in fact steers them. It is not illegal here with source of income. With that protection it would probably be less pronounced.

(Presentation)

Comment 13: What is the answer to that question that causes that discriminatory numbers when you are talking about lending, when you are talking about homeownership in those populations.

Rob Gaudin: The solution I don't know. I think certainly having more understanding of credit and how to get credit and keep good credit is important. I do believe some lenders are kind of not good lenders. Many of those have gone out of business in the last few years, I am happy to report but we still have this problem. I can print out the names of the lenders who are acting certain ways if you wish, but what are you going to do there. It is a very powerful industry.

Comment 14: That is kind of the purpose of this study is to get all of the problems down on paper so we can start to develop solutions based on these numbers.

Comment 15: The thing about it is these numbers are not new.

Rob Gaudin: That is correct.

Comment 16: It's not new, so actually what the data is showing is saying it is continuing and it is still out there. The more awareness that we are, it is like we know where, but how do we get to the solution to the problem?

Rob Gaudin: I am not even done describing the problem.

(Laughter)

(Presentation)

Comment 17: Summarize it again. What did they do? Close the door, lock it behind them, nobody collected that.

Rob Gaudin: They are not doing housing complaints. I believe strictly employment.

Comment 18: That falls under Georgia Commission, who does that fall under or is that a separate agency?

Rob Gaudin: It is a commission. It is separate.

Comment 19: So it is not under DCA or anybody?

Rob Gaudin: No.

Comment 20: The governor just and it is not on the radar.

Rob Gaudin: It certainly isn't now. It was on somebody's radar in 2010 when they decided to turn the dial to off. So that is what happened. There is lots. There are civil cases. There is employment law. They just turned it to off for housing. That is what happened.

Comment 21: Is that a national trend or is it just...

Rob Gaudin: No, it is not.

(Presentation)

Comment 22: All of them went out at the same time?

Rob Gaudin: No, these are different years and different times. I would say little less of three or four years.

(Presentation)

Comment 23: When does that close?

Rob Gaudin: I am not going to close it until you do your survey.

Comment 24: So your contract is based on this. I understand that.

Rob Gaudin: No. I don't actually distribute the survey. It has been distributed through DCAs constant contact.

Comment 25: It would be interesting to know how many were sent out and who they sent it to. This is the first time I have heard.

Rob Gaudin: Well I am not sure what is going on there. I have heard one person at yesterday's meeting saying there has to be at least 5,000 that my department sent to this group, but that is one group.

(Presentation)

Comment 26: That is a national trend.

Rob Gaudin: I think it is the opposite of the national trend. I think females are getting more loans and better jobs than say 20 years ago, but by far in the professions in law and medicine a lot of the students are female. I know my daughter wants to go to law school. I am all in favor.

Comment 27: Is there any difference between the housing system voucher and surveying the market-based housing vouchers that is using the tax-credits?

Rob Gaudin: I am not sure what you are asking. The data that had the dots on the map those are just vouchers. Low-income housing tax credit voucher goes with the resident and the building the physical thing is the tax-credit. They try to do mixed use more often.

Comment 28: Many thought would be market based low-income you might have less restrictions on (Inaudible).

Comment 29: She can't hear what you are saying.

Comment 30: Let me think about that. I was wondering if and one of my questions was, a mixed use housing development that is low-income based that is both market based and supported by low-income tax credit. Would that make a difference in the rental base for the income? Should there be more accommodation for mixed use low-income.

Rob Gaudin: That is a decision each community needs to make. I would say of course.

(Inaudible)

(Presentation)

Comment 31: So when I pass this link on, the person who is going to open it is going to say the same ignorance that I have, well this is not for me. I am not on public, I am not living in a public house. I am not renting. I am not a minority. I am not disabled. That is my perception fair housing.

Rob Gaudin: Maybe your perception isn't quite right. We all should participate.

Comment 32: That is mine and I think it is hard. I am too sure about other people. I think we and the people in this audience here they know it, they spell it because they do it every day. I don't. So I am just wondering if that is a common and most of the people that I will send it to will say I have my own house and I don't have to worry about this.

Rob Gaudin: Well the...

Comment 33: What is wrong with people living in the same community who share the same demographics? That is totally a no no isn't it because we are supposed to be moving people into...

Rob Gaudin: I would certainly like you to participate in this survey.

Comment 34: I am going to for it, but I am just saying that I think.

Rob Gaudin: Your opinions are worthwhile and I want to hear everybody's opinions and the opening paragraphs of the survey explain the same thing that I did at the beginning of today's meeting on why it is being done and why we are doing it.

Comment 35: It is about education. It is not just one sector and if they understand that then that is important, because it does directly affect you. They may not understand that, but it does affect them.

Rob Gaudin: It will affect many people.

Comment 36: Exactly.

Comment 37: I wonder if you know anything about correlation on denial rates on loans and things as related to HUD. I feel like this conversation is hard. It is like what do you need to do? Where do you start to help folks who are in this, but it just made me think to myself that we should have some better tools? At the homeless shelter we should have some better tools about protecting your credit score.

Rob Gaudin: I agree.

Comment 38: I am sure a lot of those folks that are in the shelter from very young they have made poor choices about the link between a choice and the consequence of their credit score and the outcome and on and on. Gosh, worst case scenario when I see consumers who put their child name on a power bill and draw a huge bill they made and then their 12 year old in theory has bad credit because they already defaulted on a huge bill for power. At the moment they are thinking that we need electricity for our family. I will out my kids name down because I can't put my name down because I owe so much money to Georgia Power and I have no way to pay it or I cosigned a loan because they needed a vehicle because they were going to lose their job and house and everything and then that person defaults on their car loan and that ruins their credit too. I think that is something that we can do something about.

Rob Gaudin: The lending data.

Comment 39: The education piece of how quickly you can destroy your credit. I wonder if a lot of the unauthorized loans, I am sure some of that is surely about just outright discrimination and I think a lot of it is easily because of poor credit scores and that is because a lot of folks are just not educated about what it takes to protect their credit score. I think good family can cause a reason to kind of sacrifice that.

Rob Gaudin: The data base does give a reason. Up to three reasons and lack of good credit is one among many. There is lack of employment history, lack of insurance and other. They are all in there. Missing is the one that they are supposed to fill it in, but some of these jurisdictions and these lenders don't fill it in. So I always compare the missing with race to see if there is a pattern. So sometimes it.

Comment 40: So we all suspect that is two people come in with the same credit score, with the same background and same income and same history and there is one loan and if there is one

white person applicant and there is one black. So I would think based on what we are seeing that that discrimination is going to exist so that loan is going to go to the white folk.

Comment 41: Would that fall under disparate impact, that is trying to and I think that is proposed as well. Where you have disparate impact where you have black and white and both of them basically have the same criteria, but one is given approval and one is being denied. Would that be?

Rob Gaudin: In that particular case, if we are conducting a fair housing test this is what you are doing. A paired test. There is one difference between the two applicants and that is their race. One gets the loan and the other does not. If one who did not was a minority you know exactly what happened. They have the same income. The same location and the same everything. So that is really a given, but as always these shades of gray that always confuse the issue, because one is in one neighborhood and one is in a different. Why did that happen? So it is very complicated. The lending information only gives me some information. Why does this pattern exist? Your point about education is extremely correct. These folks...

Comment 42: That is a low hanging fruit I think.

Rob Gaudin: That is true and HUD says outreach and education is not the only thing you can do. What else are you going to do?

Comment 43: But if you got the disparate impact, unless you state that you are not discriminating because you had the actually two clients. One meet the criteria and the other one didn't so you had to pull up some criteria for the know. You did the same thing and said yes. So that is probably what the disparate impact does. It shows and I guess that is proposed as well.

Rob Gaudin: It is proposed.

Comment 44: So it hasn't gotten around to...

Rob Gaudin: The disparate impact I think it is a Texas case that was heard in January by the Supreme Court. The qualifying allocation plan for low-income housing tax credit got sued by this partnership in Texas and it made it all the way to the Supreme Court. It was heard in January and it is supposed to be a decision next month.

Comment 45: With the five year update to the State Housing Plan. Is there any and does it say there is any flexibility in terms of how HUD funding is used? Can it be more for education? Could it be more for incentives?

Rob Gaudin: I am not really the right one to address how the state is going to respond. How they are going to allocate their funding, but that is handled through the Consolidated Plan and I am not even sure who is handling that. Sorry. Is there a DCA representative here? Can you answer that question?

Comment 46: As far as the Consolidated Plan? They set up hearings and we have hearings with HUD. I think he is in charge of that. (Inaudible)

APPENDIX L. COMMENTS FROM PHA OUTREACH COMMITTEE MEETINGS

4/1/2015 PUBLIC HOUSING AUTHORITY OUTREACH COMMITTEE MEETING

No Comments

4/27/2015 PUBLIC HOUSING AUTHORITY OUTREACH COMMITTEE MEETING

Comment 1: At the beginning you said that we need to either join an entitlement or state AI process. How do we go about doing that?

Rob Gaudin: Well by attending these outreach meetings that is your first step. Which PHA are you representing?

Comment 2: We are in Monroe, Georgia. Do we actually join with our local city? What do we need to do?

Rob Gaudin: If your city is an entitlement and you can join with them. If that is not an entitlement you can participate with us. I am thinking that you do need to certify that you are affirmatively furthering fair housing for your Five-Year PHA Plan and to have some kind of action item in there for FHEO to look at. It could be what turns out to be in this state plan; you can just stay connected with it. When we go out with the public input meetings maybe you can direct your residents to where we are going to make presentations or have them fill out the survey. That is a great way to do it. In the end if there are things you don't like we certainly want to hear about that. If there are things that you do like we certainly want to hear about that. If you think there is something that we have overlooked we would certainly like to hear about that. So you are already participating and that is a great thing.

Comment 3: Alright, well thank you.

6/30/2015 PUBLIC HOUSING AUTHORITY OUTREACH COMMITTEE MEETING

No Comments

7/14/2015 Public Housing Authority Outreach Committee Meeting

No Comments

APPENDIX M. COMMENTS FROM GRANTEE OUTREACH COMMITTEE MEETINGS

4/3/2015 GRANTEE OUTREACH COMMITTEE MEETING

Comment 1: How can we get a copy of the PowerPoint?

Rob Gaudin: You can email me.

Comment 2: I would like a copy of this presentation emailed to me at this address.

Rob Gaudin: That certainly will happen.

Comment 3: Entitlement areas have zoning regulations that are highly discriminatory against persons with disabilities.

Rob Gaudin: That is great to know. Thank you so much.

Comment 4: For entitlements participating in DCA Continuum of Care, how will you handle the homeless data?

Rob Gaudin: That is a good question. This is the homeless data per say is outside of this, it is more how homeless persons are treated when trying to get in a residence. When they are trying to acquire housing and hopefully we can address that in the survey or if the homeless person wants to participate in the survey we have something for them as well.

Comment 5: Who do you suggest we ask in our rural southeast area?

Rob Gaudin: I would suggest for the stakeholder's survey everyone who is related to some service provider whether that is Catholic Charities, a homeless organization, disabled groups, certainly realtors and property managers. For the communities each of these, especially the faith based organizations if we can ask them to present the citizen survey we would be happy to send you the link. If you can email me at this address right here, I would be happy to respond to that and then you could print copies and hand it out at church or hand it out at a public meeting or anything that you wish in that regard.

Comment 6: What kind of info are they seeking from residents?

Rob Gaudin: I would encourage you to take a look at the survey. There is a little bit about attributes of the respondent and then there are some general questions about their experiences in trying to acquire a house whether that is a rental unit or homeownership. As well as your knowledge of discriminatory activities.

Comment 7: What is the Affirmatively Furthering Fair Housing Certification and how does it affect service providers?

Rob Gaudin: Service providers that are funded through the Department of Community Affairs have to as well certify that they are affirmatively furthering fair housing and when we get to the end we will know what impediments there are and we will need to take actions on those

impediments so at the end of this study those are the things that we will need to work on together.

4/27/2015 Grantee Outreach Committee Meeting

Comment 1: Housing Authority of Columbus Georgia. We were talking about fair housing earlier and I wanted to know if you knew of any laws that prohibit Housing Authority requiring services that use their vouchers. Here is a scenario. We have what we call Rapid Re-Housing Vouchers and we are using them for our chronically homeless. To clarify very quickly we are a MTW agency. We are using some of our housing vouchers for the chronically homeless. The chronically homeless have some sort of mental illness. They are at New Horizons which is a counseling facility and when we get them and once we get them housed we want them to continue treatment and we wanted to know and we have been doing research to see if that poses a fair housing violation and I have gotten mixed research where if we are using Section 8-11 and Section 504 it doesn't, but I didn't know if you knew if we were violating any other fair housing laws? I don't know if that is really your preview, but I didn't know if you heard anything about that?

Rob Gaudin: That particular issue it would behoove us to consider if we would like the state to add protections for public support forms of income or source of income. Certainly that might be a challenge for some groups if it is based solely on the disability, but if they have no income that is really a challenge or they get this as public support the landlord can still say in Georgia that I don't want that here, which is a reality.

Comment 2: OK. If we require the residents to continue their service we are not infringing upon their fair housing? Because we are not and I don't think that we are violating any of the seven protected classes. It is and we want them to continue their treatment. Some of our residents are like I have shelter so I don't need to go and get counsel. So the fear is that they won't do what they need to do and they will be back on the street soon.

Rob Gaudin: I am not a legal team. I can't give you a legal opinion, but I would continue to pursue that. I think that is a wise choice.

Comment 3: Alright.

Rob Gaudin: Any other questions or concerns?

6/30/2015 GRANTEE OUTREACH COMMITTEE MEETING

Comment 1: I need time to digest the impediments. Can we discuss at a later date via email.

Rob Gaudin: Most certainly, I totally understand. You can send them to me or Antonette. Whatever is your preference? We have plenty of time. You can digest these things and challenge what we can do collectively to overcome these things. What can we do to make headway with these things?

Comment 2: Are there any opportunities for training on ADA requirements?

Rob Gaudin: I don't know. I would tend to think that we should have some training on ADA and state level accessibility. Thank you for that. I don't know of those currently, but hopefully we can get that to you when we do find those.

Comment 3: Will we receive a link to access the presentation?

Rob Gaudin: Probably within a day or two.

7/14/2015 GRANTEE OUTREACH COMMITTEE MEETING

Comment 1: Support FHAP development in the balance of the state?

Rob Gaudin: That is a very good notion. There are two types of grants, fair housing grants offers one and is a state or local agency that has administrative muscle to be similar to federal fair housing law and that would be a FHAP. Typically, those would be for testing and enforcement. There is also a FHIP, a Fair Housing Imitative Program recipient and I am thinking for the rural areas of the state both FHAP and FHIP might be a great way to approach that. The DCA might help facilitate that and that is an excellent idea. Are there any other comments anyone would like to make?

(Presentation)

Comment 2: Does DCA know what percent of housing in Georgia qualifies as affordable.

Rob Gaudin: I will have to defer that to December. Are you able to answer that?

Comment 3: Not at this moment, no.

Rob Gaudin: Thank you very much.

(Presentation)

Comment 3: DCA provides little to zero direct annual assistance to most small cities which are not entitlement cities. Any discussion on changing funding parameters?

Rob Gaudin: This is a discussion right now and some of these are should, could, will they? What this exercise is about is to open discussion.

Comment 4: Should DCA conduct outreach and referrals to advocacy groups?

Comment 5: What else might DCA do or consider doing to address these impediments?

Rob Gaudin: I think that is a key parameter around which this whole exercise. We have been through four webinars. The first was to introduce you to what we need to do with the AI; the second and third we dealt with some findings form the data; and today we look at what the preliminary impediments are and consider hopefully some things that we can do. We, meaning DCA. So let's back up a little bit here. So in any of these things or all of them what is your opinion? Does anyone have an opinion?

Comment 6: Regarding the quantity of dwelling units currently statewide owned by Public Housing Authority, what is that number?

Rob Gaudin: I don't have that number.

Comment 7: Utilize state approved Housing Counseling Agencies to conduct education and outreach.

Rob Gaudin: That is a great idea.

Comment 8: I would have to agree with funding fair housing activities.

Rob Gaudin: I think that is also a great comment.

(Presentation)

Comment 9: Regarding funding, CDBG funds it would benefit all Georgians statewide to distribute 100 percent of those funds by city population. Has that been discussed?

Rob Gaudin: I am not sure if it has or has not been discussed. Since you brought it up it is a point that DCA will now be considering, reallocation of those based on population. The idea here is that we all have to certify that we are affirmatively furthering fair housing. It is important that in DCA's final report that we have identified some impediments and what actions are we going to take to address those impediments. To the extent that local units of governments receive these funds, they too will need to certify that they are affirmatively furthering fair housing.

APPENDIX N. ADDITIONAL HMDA TABLES

Table N.1
Owner-Occupied Home Purchase Loan Applications by Loan Type

Non-Entitlement Areas of Georgia
 2004–2013 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Non-Entitlement Areas of Georgia											
Conventional	119,118	156,621	164,204	110,961	42,206	27,093	23,196	25,229	28,659	37,413	734,700
FHA - Insured	23,343	20,808	18,055	18,015	30,041	30,305	30,102	27,017	26,376	26,046	250,108
VA - Guaranteed	7,225	7,580	8,565	6,869	7,940	9,563	9,565	10,288	9,961	11,147	88,703
Rural Housing Service or Farm Service Agency	580	568	511	648	2,557	7,992	6,424	7,533	7,847	9,751	44,411
Total	150,266	185,577	191,335	136,493	82,744	74,953	69,287	70,067	72,843	84,357	1,117,922
Entitled Areas of Georgia											
Conventional	178,936	239,794	249,959	155,029	56,479	36,387	26,709	29,575	36,024	49,382	1,058,274
FHA - Insured	27,079	20,235	16,458	18,309	39,866	49,055	44,199	39,090	38,482	33,364	326,137
VA - Guaranteed	6,525	5,474	5,940	4,886	5,816	7,091	6,656	7,024	7,413	8,455	65,280
Rural Housing Service or Farm Service Agency	84	54	17	19	124	542	362	429	515	455	2,601
Total	212,624	265,557	272,374	178,243	102,285	93,075	77,926	76,118	82,434	91,656	1,452,292
State of Georgia											
Conventional	298,054	396,415	414,163	265,990	98,685	63,480	49,905	54,804	64,683	86,795	1,792,974
FHA - Insured	50,422	41,043	34,513	36,324	69,907	79,360	74,301	66,107	64,858	59,410	576,245
VA - Guaranteed	13,750	13,054	14,505	11,755	13,756	16,654	16,221	17,312	17,374	19,602	153,983
Rural Housing Service or Farm Service Agency	664	622	528	667	2,681	8,534	6,786	7,962	8,362	10,206	47,012
Total	362,890	451,134	463,709	314,736	185,029	168,028	147,213	146,185	155,277	176,013	2,570,214

DENIAL RATES

Table N.2
Loan Applications by Reason for Denial
 Non-Entitlement Areas of Georgia
 2004–2013 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Non-Entitlement Areas of Georgia											
Debt-to-Income Ratio	1,829	2,074	2,428	2,308	1,601	1,507	1,511	1,564	1,594	1,587	18,003
Employment History	258	349	445	347	199	199	208	172	207	175	2,559
Credit History	4,183	4,734	4,687	4,438	2,937	2,467	2,800	3,034	3,097	2,494	34,871
Collateral	961	1,323	1,473	1,240	677	749	789	728	808	1,057	9,805
Insufficient Cash	460	471	442	514	335	202	162	206	181	230	3,203
Unverifiable Information	506	855	874	680	371	231	244	229	263	278	4,531
Credit Application Incomplete	825	1,291	1,176	1,135	435	324	402	339	475	509	6,911
Mortgage Insurance Denied	4	3	19	29	35	31	23	12	11	14	181
Other	2,010	2,891	2,366	1,516	628	584	532	498	496	457	11,978
Missing	4,888	5,987	7,234	4,468	2,738	1,506	1,899	2,301	2,921	4,940	38,882
Total	15,924	19,978	21,144	16,675	9,956	7,800	8,570	9,083	10,053	11,741	130,924
Entitled Areas of Georgia											
Debt-to-Income Ratio	2,515	3,150	3,708	3,381	2,215	1,770	1,701	1,472	1,582	1,603	23,097
Employment History	521	705	759	506	254	227	221	190	220	203	3,806
Credit History	4,023	5,243	5,271	4,113	2,223	1,535	1,427	1,570	1,657	1,420	28,482
Collateral	1,673	2,759	2,927	2,551	1,452	1,269	1,262	981	1,227	1,500	17,601
Insufficient Cash	646	537	623	679	453	265	199	195	243	294	4,134
Unverifiable Information	1,487	2,077	2,267	1,742	803	440	409	358	417	432	10,432
Credit Application Incomplete	1,950	2,796	2,452	2,587	976	495	523	472	669	926	13,846
Mortgage Insurance Denied	6	20	21	20	90	49	13	11	15	10	255
Other	3,353	5,219	4,367	3,172	1,130	725	677	560	612	539	20,354
Missing	5,836	8,095	12,506	4,967	2,555	1,241	1,313	1,553	1,662	1,756	41,484
Total	22,010	30,601	34,901	23,718	12,151	8,016	7,745	7,362	8,304	8,683	163,491
State of Georgia											
Debt-to-Income Ratio	4,344	5,224	6,136	5,689	3,816	3,277	3,212	3,036	3,176	3,190	41,100
Employment History	779	1,054	1,204	853	453	426	429	362	427	378	6,365
Credit History	8,206	9,977	9,958	8,551	5,160	4,002	4,227	4,604	4,754	3,914	63,353
Collateral	2,634	4,082	4,400	3,791	2,129	2,018	2,051	1,709	2,035	2,557	27,406
Insufficient Cash	1,106	1,008	1,065	1,193	788	467	361	401	424	524	7,337
Unverifiable Information	1,993	2,932	3,141	2,422	1,174	671	653	587	680	710	14,963
Credit Application Incomplete	2,775	4,087	3,628	3,722	1,411	819	925	811	1,144	1,435	20,757
Mortgage Insurance Denied	10	23	40	49	125	80	36	23	26	24	436
Other	5,363	8,110	6,733	4,688	1,758	1,309	1,209	1,058	1,108	996	32,332
Missing	10,724	14,082	19,740	9,435	5,293	2,747	3,212	3,854	4,583	6,696	80,366
Total	37,934	50,579	56,045	40,393	22,107	15,816	16,315	16,445	18,357	20,424	294,415

Table N.3
Denial Rates by Race/Ethnicity of Applicant
 Non-Entitlement Areas of Georgia
 2004–2013 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Average
Non-Entitlement Areas of Georgia											
American Indian	25.8%	31.7%	26.6%	28.1%	30.4%	30.0%	32.5%	31.4%	41.8%	39.6%	30.4%
Asian	13.7%	15.0%	14.4%	17.6%	19.1%	19.0%	18.7%	18.9%	16.2%	16.6%	16.4%
Black	25.8%	26.8%	28.2%	31.8%	31.0%	29.2%	30.7%	34.6%	37.7%	38.0%	29.8%
White	13.7%	14.0%	14.0%	16.1%	16.7%	16.9%	19.8%	20.1%	21.2%	20.5%	16.3%
Not Available	27.3%	26.7%	28.8%	29.0%	25.3%	21.4%	24.7%	31.6%	35.3%	36.0%	28.2%
Not Applicable	21.8%	34.8%	28.0%	25.0%	17.6%	15.4%	33.3%	81.8%	22.2%	25.0%	24.5%
Average	17.2%	17.7%	18.3%	20.2%	19.9%	19.3%	22.0%	23.3%	24.6%	24.0%	19.8%
Non-Hispanic	15.6%	16.0%	16.9%	19.0%	19.0%	18.6%	21.0%	21.7%	21.9%	21.0%	18.3%
Hispanic	20.1%	22.1%	17.8%	21.6%	24.0%	23.3%	24.3%	23.1%	27.8%	24.3%	21.7%
Entitled Areas of Georgia											
American Indian	22.6%	24.1%	25.3%	37.5%	30.2%	25.4%	35.8%	27.0%	30.6%	21.8%	26.8%
Asian	12.1%	15.3%	15.9%	17.9%	20.0%	17.9%	19.9%	18.4%	17.5%	16.9%	16.5%
Black	24.7%	27.4%	32.0%	35.0%	30.3%	25.3%	24.3%	26.1%	27.7%	27.6%	28.9%
White	9.3%	11.0%	11.7%	12.7%	13.9%	12.3%	13.1%	12.8%	12.9%	12.1%	11.7%
Not Available	26.0%	24.7%	27.4%	28.3%	22.0%	18.1%	22.8%	27.7%	26.7%	21.8%	25.2%
Not Applicable	27.8%	35.0%	30.0%	41.2%	28.6%	25.0%	25.0%	50.0%	14.3%	14.3%	28.3%
Average	16.5%	18.8%	21.5%	22.6%	20.6%	17.0%	18.1%	18.4%	18.3%	16.9%	19.3%
Non-Hispanic	14.8%	17.6%	20.6%	21.6%	19.7%	16.4%	16.7%	16.6%	16.8%	15.7%	18.1%
Hispanic	17.5%	20.1%	21.4%	23.1%	30.0%	21.4%	24.7%	22.8%	21.5%	21.7%	21.6%
State of Georgia											
American Indian	23.8%	27.2%	25.9%	33.1%	30.3%	27.8%	34.2%	29.3%	35.7%	30.4%	28.4%
Asian	12.5%	15.2%	15.6%	17.8%	19.8%	18.2%	19.6%	18.6%	17.2%	16.8%	16.5%
Black	25.0%	27.2%	30.9%	34.0%	30.5%	26.5%	26.5%	29.1%	31.2%	31.5%	29.2%
White	11.5%	12.5%	12.9%	14.5%	15.5%	14.8%	16.9%	16.9%	17.4%	16.7%	14.1%
Not Available	26.5%	25.4%	27.9%	28.5%	23.2%	19.3%	23.6%	29.4%	30.2%	27.4%	26.3%
Not Applicable	25.7%	34.9%	28.9%	31.7%	23.7%	17.6%	30.8%	73.3%	18.8%	18.2%	26.8%
Average	16.8%	18.4%	20.1%	21.5%	20.3%	18.1%	19.9%	20.8%	21.3%	20.3%	19.5%
Non-Hispanic	15.1%	16.9%	19.0%	20.4%	19.3%	17.5%	18.8%	19.2%	19.3%	18.3%	18.2%
Hispanic	18.3%	20.7%	20.2%	22.6%	27.9%	22.1%	24.6%	22.9%	23.9%	22.8%	21.6%

Table N.4
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant

Non-Entitlement Areas of Georgia
2004–2013 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
American Indian	Originated	287	289	306	200	112	84	106	94	82	96	1,656
	Denied	100	134	111	78	49	36	51	43	59	63	724
	Denial Rate	25.8%	31.7%	26.6%	28.1%	30.4%	32.5%	32.5%	31.4%	41.8%	39.6%	30.4%
Asian	Originated	1,456	1,868	2,112	1,579	940	888	780	783	944	1,339	12,689
	Denied	231	330	356	338	222	208	179	182	183	266	2,495
	Denial Rate	13.7%	15.0%	14.4%	17.6%	19.1%	19.0%	18.7%	18.9%	16.2%	16.6%	16.4%
Black	Originated	11,433	15,604	16,679	10,029	5,645	4,301	4,302	3,890	3,720	4,003	79,606
	Denied	3,980	5,701	6,536	4,674	2,535	1,771	1,902	2,055	2,251	2,452	33,857
	Denial Rate	25.8%	26.8%	28.2%	31.8%	31.0%	29.2%	30.7%	34.6%	37.7%	38.0%	29.8%
White	Originated	56,571	67,026	67,555	48,695	29,733	24,549	22,784	22,812	24,111	29,284	393,120
	Denied	8,965	10,879	10,983	9,319	5,958	5,008	5,628	5,742	6,492	7,560	76,534
	Denial Rate	13.7%	14.0%	14.0%	16.1%	16.7%	16.9%	19.8%	20.1%	21.2%	20.5%	16.3%
Not Available	Originated	6,867	8,052	7,784	5,546	3,510	2,851	2,456	2,278	1,950	2,491	43,785
	Denied	2,584	2,926	3,151	2,260	1,189	775	807	1,052	1,066	1,399	17,209
	Denial Rate	27.3%	26.7%	28.8%	29.0%	25.3%	21.4%	24.7%	31.6%	35.3%	36.0%	28.2%
Not Applicable	Originated	229	15	18	18	14	11	6	2	7	3	323
	Denied	64	8	7	6	3	2	3	9	2	1	105
	Denial Rate	27.3%	26.7%	28.8%	29.0%	25.3%	21.4%	24.7%	31.6%	35.3%	36.0%	24.5%
Total	Originated	76,843	92,854	94,454	66,067	39,954	32,684	30,434	29,859	30,814	37,216	531,179
	Denied	15,924	19,978	21,144	16,675	9,956	7,800	8,570	9,083	10,053	11,741	130,924
	Denial Rate	17.2%	17.7%	18.3%	20.2%	19.9%	19.3%	22.0%	23.3%	24.6%	24.0%	19.8%
Non-Hispanic	Originated	60,408	79,686	82,054	57,928	35,103	28,746	26,684	26,359	27,543	32,826	457,337
	Denied	11,194	15,158	16,730	13,617	8,218	6,588	7,089	7,303	7,730	8,739	102,366
	Denial Rate	15.6%	16.0%	16.9%	19.0%	19.0%	18.6%	21.0%	21.7%	21.9%	21.0%	18.3%
Hispanic	Originated	3,286	4,500	5,253	3,001	1,521	1,087	1,212	1,188	1,178	1,653	23,879
	Denied	828	1,273	1,140	825	480	331	390	357	453	531	6,608
	Denial Rate	20.1%	22.1%	17.8%	21.6%	24.0%	23.3%	24.3%	23.1%	27.8%	24.3%	21.7%

Table N.5
Loan Applications by Selected Action Taken by Gender of Applicant

Non-Entitlement Areas of Georgia
2004–2013 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Male	Originated	51,346	60,992	61,364	43,584	26,600	21,337	19,845	19,685	20,871	25,411	351,035
	Denied	9,229	11,501	11,983	9,596	5,706	4,599	4,983	5,234	5,830	6,923	75,584
	Denial Rate	15.2%	15.9%	16.3%	18.0%	17.7%	17.7%	20.1%	21.0%	21.8%	21.4%	17.7%
Female	Originated	22,373	28,258	29,224	19,489	11,347	9,598	8,970	8,759	8,762	10,237	157,017
	Denied	5,532	7,265	7,699	5,890	3,543	2,750	3,083	3,356	3,622	4,021	46,761
	Denial Rate	19.8%	20.5%	20.9%	23.2%	23.8%	22.3%	25.6%	27.7%	29.2%	28.2%	22.9%
Not Available	Originated	3,105	3,592	3,849	2,973	1,993	1,739	1,613	1,412	1,174	1,565	23,015
	Denied	1,161	1,202	1,457	1,184	703	447	501	490	598	796	8,539
	Denial Rate	27.2%	25.1%	27.5%	28.5%	26.1%	20.4%	23.7%	25.8%	33.7%	33.7%	27.1%
Not Applicable	Originated	19	12	17	21	14	10	6	3	7	3	112
	Denied	2	10	5	5	4	4	3	3	3	1	40
	Denial Rate	9.5%	45.5%	22.7%	19.2%	22.2%	28.6%	33.3%	50.0%	30.0%	25.0%	26.3%
Total	Originated	76,843	92,854	94,454	66,067	39,954	32,684	30,434	29,859	30,814	37,216	531,179
	Denied	15,924	19,978	21,144	16,675	9,956	7,800	8,570	9,083	10,053	11,741	130,924
	Denial Rate	17.2%	17.7%	18.3%	20.2%	19.9%	19.3%	22.0%	23.3%	24.6%	24.0%	19.8%

Table N.6
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant

Non-Entitlement Areas of Georgia
 2004–2013 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Non-Entitlement Areas of Georgia								
Debt-to-Income Ratio	94	442	4,867	10,660	1,931	9	18,003	979
Employment History	13	83	564	1,614	281	4	2,559	191
Credit History	206	395	9,414	20,680	4,159	17	34,871	1,522
Collateral	41	227	1,689	6,606	1,236	6	9,805	472
Insufficient Cash	9	85	690	2,063	351	5	3,203	187
Unverifiable Information	29	215	1,372	2,293	606	16	4,531	412
Credit Application Incomplete	40	238	1,557	4,099	968	9	6,911	394
Mortgage Insurance Denied	1	6	45	104	25	0	181	13
Other	51	299	3,143	6,647	1,824	14	11,978	670
Missing	240	505	10,516	21,768	5,828	25	38,882	1,768
Total	724	2,495	33,857	76,534	17,209	105	130,924	6,608
% Missing	33.1%	20.2%	31.1%	28.4%	33.9%	23.8%	29.7%	26.8%
Entitled Areas of Georgia								
Debt-to-Income Ratio	141	1,401	10,765	7,515	3,261	14	23,097	1,837
Employment History	21	311	1,674	1,316	479	5	3,806	373
Credit History	194	947	14,449	8,359	4,514	19	28,482	2,066
Collateral	52	923	7,529	6,359	2,726	12	17,601	1,026
Insufficient Cash	21	247	1,767	1,510	583	6	4,134	310
Unverifiable Information	57	803	5,028	3,123	1,382	39	10,432	1,077
Credit Application Incomplete	55	921	5,692	5,077	2,072	29	13,846	1,204
Mortgage Insurance Denied	0	15	95	99	46	0	255	33
Other	82	1,056	9,832	6,060	3,292	32	20,354	1,431
Missing	207	1,320	22,286	9,925	7,718	28	41,484	2,679
Total	830	7,944	79,117	49,343	26,073	184	163,491	12,036
% Missing	24.9%	16.6%	28.2%	20.1%	29.6%	15.2%	25.4%	22.3%
State of Georgia								
Debt-to-Income Ratio	235	1,843	15,632	18,175	5,192	23	41,100	2,816
Employment History	34	394	2,238	2,930	760	9	6,365	564
Credit History	400	1,342	23,863	29,039	8,673	36	63,353	3,588
Collateral	93	1,150	9,218	12,965	3,962	18	27,406	1,498
Insufficient Cash	30	332	2,457	3,573	934	11	7,337	497
Unverifiable Information	86	1,018	6,400	5,416	1,988	55	14,963	1,489
Credit Application Incomplete	95	1,159	7,249	9,176	3,040	38	20,757	1,598
Mortgage Insurance Denied	1	21	140	203	71	0	436	46
Other	133	1,355	12,975	12,707	5,116	46	32,332	2,101
Missing	447	1,825	32,802	31,693	13,546	53	80,366	4,447
Total	1,554	10,439	112,974	125,877	43,282	289	294,415	18,644
% Missing	28.8%	17.5%	29.0%	25.2%	31.3%	18.3%	27.3%	23.9%

HIGH ANNUAL PERCENTAGE-RATE LOANS

Table N.7
Loans by Loan Purpose by HAL Status
 Non-Entitlement Areas of Georgia
 2004–2013 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Non-Entitlement Areas of Georgia												
Home Purchase	Other	64,411	67,892	71,929	56,601	35,147	29,832	29,564	28,926	29,734	36,255	450,291
	HAL	12,432	24,962	22,525	9,466	4,807	2,852	870	933	1,080	961	80,888
	Percent HAL	16.2%	26.9%	23.8%	14.3%	12.0%	8.7%	2.9%	3.1%	3.5%	2.6%	15.2%
Home Improvement	Other	6,388	7,095	7,701	7,226	4,671	3,583	3,699	3,687	3,731	4,667	52,448
	HAL	3,274	3,920	4,086	4,105	2,333	1,229	304	213	250	217	19,931
	Percent HAL	33.9%	35.6%	34.7%	36.2%	33.3%	25.5%	7.6%	5.5%	6.3%	4.4%	27.5%
Refinancing	Other	61,493	53,079	47,174	46,908	42,735	67,862	53,309	51,677	74,208	63,066	561,511
	HAL	19,749	26,226	26,481	20,126	14,588	8,950	1,335	1,545	1,719	1,118	121,837
	Percent HAL	24.3%	33.1%	36.0%	30.0%	25.4%	11.7%	2.4%	2.9%	2.3%	1.7%	17.8%
Total	Other	132,292	128,066	126,804	110,735	82,553	101,277	86,572	84,290	107,673	103,988	1,064,250
	HAL	35,455	55,108	53,092	33,697	21,728	13,031	2,509	2,691	3,049	2,296	222,656
	Percent HAL	21.1%	30.1%	29.5%	23.3%	20.8%	11.4%	2.8%	3.1%	2.8%	2.8%	17.3%
Entitled Areas of Georgia												
Home Purchase	Other	94,239	91,700	92,747	70,710	43,355	37,561	34,874	32,435	36,838	42,550	577,009
	HAL	17,022	40,133	35,040	10,701	3,520	1,554	193	209	224	177	108,773
	Percent HAL	15.3%	30.4%	27.4%	13.1%	7.5%	4.0%	0.6%	0.6%	0.6%	0.4%	15.9%
Home Improvement	Other	5,725	6,671	7,715	6,118	3,703	2,335	1,992	2,030	2,613	3,306	42,208
	HAL	2,011	2,773	2,741	2,358	729	245	134	93	98	96	11,278
	Percent HAL	26.0%	29.4%	26.2%	27.8%	16.4%	9.5%	6.3%	4.4%	3.6%	2.8%	21.1%
Refinancing	Other	78,787	62,021	50,135	47,901	41,178	74,732	56,237	54,739	89,265	69,377	624,372
	HAL	18,137	26,142	25,337	14,047	5,010	2,374	277	278	370	225	92,197
	Percent HAL	18.7%	29.7%	33.6%	22.7%	10.8%	3.1%	0.5%	0.5%	0.4%	0.3%	12.9%
Total	Other	178,751	160,392	150,597	124,729	88,236	114,628	93,103	89,204	128,716	115,233	1,243,589
	HAL	37,170	69,048	63,118	27,106	9,259	4,173	604	580	692	498	212,248
	Percent HAL	17.2%	30.1%	29.5%	17.9%	9.5%	3.5%	0.6%	0.6%	0.5%	0.5%	14.6%
State of Georgia												
Home Purchase	Other	158,650	159,592	164,676	127,311	78,502	67,393	64,438	61,361	66,572	78,805	1,027,300
	HAL	29,454	65,095	57,565	20,167	8,327	4,406	1,063	1,142	1,304	1,138	189,661
	Percent HAL	15.7%	29.0%	25.9%	13.7%	9.6%	6.1%	1.6%	1.8%	1.9%	1.4%	15.6%
Home Improvement	Other	12,113	13,766	15,416	13,344	8,374	5,918	5,691	5,717	6,344	7,973	94,656
	HAL	5,285	6,693	6,827	6,463	3,062	1,474	438	306	348	313	31,209
	Percent HAL	30.4%	32.7%	30.7%	32.6%	26.8%	19.9%	7.1%	5.1%	5.2%	3.8%	24.8%
Refinancing	Other	140,280	115,100	97,309	94,809	83,913	142,594	109,546	106,416	163,473	132,443	1,185,883
	HAL	37,886	52,368	51,818	34,173	19,598	11,324	1,612	1,823	2,089	1,343	214,034
	Percent HAL	21.3%	31.3%	34.7%	26.5%	18.9%	7.4%	1.5%	1.7%	1.3%	1.0%	15.3%
Total	Other	311,043	288,458	277,401	235,464	170,789	215,905	179,675	173,494	236,389	219,221	2,307,839
	HAL	72,625	124,156	116,210	60,803	30,987	17,204	3,113	3,271	3,741	2,794	434,904
	Percent HAL	18.9%	30.1%	29.5%	20.5%	15.4%	7.4%	1.7%	1.9%	1.6%	1.6%	15.9%

Table N.8
HALs Originated by Race of Borrower
 Non-Entitlement Areas of Georgia
 2004–2013 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Non-Entitlement Areas of Georgia											
American Indian	62	85	95	27	13	8	6	4	2	5	307
Asian	138	329	306	110	70	51	12	4	6	10	1,036
Black	3,437	7,650	7,204	2,382	758	390	137	134	168	158	22,418
White	7,702	14,076	12,880	6,145	3,747	2,321	697	746	838	745	49,897
Not Available	1,078	2,822	2,039	800	216	82	18	45	66	43	7,209
Not Applicable	15	0	1	2	3	0	0	0	0	0	21
Total	12,432	24,962	22,525	9,466	4,807	2,852	870	933	1,080	961	80,888
Non-Hispanic	9,920	20,415	19,034	8,206	4,364	2,677	773	801	840	754	67,784
Hispanic	587	1,428	1,565	484	200	77	45	23	48	29	4,486
Entitled Areas of Georgia											
American Indian	91	157	115	29	6	3	0	1	3	2	407
Asian	433	1,148	1,072	300	116	62	10	6	4	4	3,155
Black	9,212	22,150	19,491	5,465	1,482	639	21	32	38	34	58,564
White	5,283	11,809	10,513	3,670	1,513	722	159	158	165	121	34,113
Not Available	1,968	4,868	3,847	1,236	400	128	3	12	14	16	12,492
Not Applicable	35	1	2	1	3	0	0	0	0	0	42
Total	17,022	40,133	35,040	10,701	3,520	1,554	193	209	224	177	108,773
Non-Hispanic	12,833	31,468	28,017	8,479	2,701	1,305	181	176	185	152	85,497
Hispanic	1,114	3,393	3,475	1,097	451	122	6	19	22	6	9,705
State of Georgia											
American Indian	153	242	210	56	19	11	6	5	5	7	714
Asian	571	1,477	1,378	410	186	113	22	10	10	14	4,191
Black	12,649	29,800	26,695	7,847	2,240	1,029	158	166	206	192	80,982
White	12,985	25,885	23,393	9,815	5,260	3,043	856	904	1,003	866	84,010
Not Available	3,046	7,690	5,886	2,036	616	210	21	57	80	59	19,701
Not Applicable	50	1	3	3	6	0	0	0	0	0	63
Total	29,454	65,095	57,565	20,167	8,327	4,406	1,063	1,142	1,304	1,138	189,661
Non-Hispanic	22,753	51,883	47,051	16,685	7,065	3,982	954	977	1,025	906	153,281
Hispanic	1,701	4,821	5,040	1,581	651	199	51	42	70	35	14,191

Table N.9
Loans by HAL Status by Race/Ethnicity of Borrower
 Non-Entitlement Areas of Georgia
 2004–2013 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
American Indian	Other	225	204	211	173	99	76	100	90	80	91	1,349
	HAL	62	85	95	27	13	8	6	4	2	5	307
	Percent HAL	21.6%	29.4%	31.0%	13.5%	11.6%	9.5%	5.7%	4.3%	2.4%	5.2%	18.5%
Asian	Other	1,318	1,539	1,806	1,469	870	837	768	779	938	1,329	11,653
	HAL	138	329	306	110	70	51	12	4	6	10	1,036
	Percent HAL	9.5%	17.6%	14.5%	7.0%	7.4%	5.7%	1.5%	.5%	.6%	.7%	8.2%
Black	Other	7,996	7,954	9,475	7,647	4,887	3,911	4,165	3,756	3,552	3,845	57,188
	HAL	3,437	7,650	7,204	2,382	758	390	137	134	168	158	22,418
	Percent HAL	30.1%	49.0%	43.2%	23.8%	13.4%	9.1%	3.2%	3.4%	4.5%	3.9%	28.2%
White	Other	48,869	52,950	54,675	42,550	25,986	22,228	22,087	22,066	23,273	28,539	343,223
	HAL	7,702	14,076	12,880	6,145	3,747	2,321	697	746	838	745	49,897
	Percent HAL	13.6%	21.0%	19.1%	12.6%	12.6%	9.5%	3.1%	3.3%	3.5%	2.5%	12.7%
Not Available	Other	5,789	5,230	5,745	4,746	3,294	2,769	2,438	2,233	1,884	2,448	36,576
	HAL	1,078	2,822	2,039	800	216	82	18	45	66	43	7,209
	Percent HAL	15.7%	35.0%	26.2%	14.4%	6.2%	2.9%	.7%	2.0%	3.4%	1.7%	16.5%
Not Applicable	Other	214	15	17	16	11	11	6	2	7	3	302
	HAL	15	0	1	2	3	0	0	0	0	0	21
	Percent HAL	6.6%	.0%	5.6%	11.1%	21.4%	.0%	.0%	.0%	.0%	.0%	6.5%
Total	Other	64,411	67,892	71,929	56,601	35,147	29,832	29,564	28,926	29,734	36,255	450,291
	HAL	12,432	24,962	22,525	9,466	4,807	2,852	870	933	1,080	961	80,888
	Percent HAL	16.2%	26.9%	23.8%	14.3%	12.0%	8.7%	2.9%	3.1%	3.5%	2.6%	15.2%
Non-Hispanic	Other	50,488	59,271	63,020	49,722	30,739	26,069	25,911	25,558	26,703	32,072	389,553
	HAL	9,920	20,415	19,034	8,206	4,364	2,677	773	801	840	754	67,784
	Percent HAL	16.4%	25.6%	23.2%	14.2%	12.4%	9.3%	2.9%	3.0%	3.0%	2.3%	14.8%
Hispanic	Other	2,699	3,072	3,688	2,517	1,321	1,010	1,167	1,165	1,130	1,624	19,393
	HAL	587	1,428	1,565	484	200	77	45	23	48	29	4,486
	Percent HAL	17.9%	31.7%	29.8%	16.1%	13.1%	7.1%	3.7%	1.9%	4.1%	1.8%	18.8%

Table N.10
Rates of HALs by Income of Borrower
 Non-Entitlement Areas of Georgia
 2004–2013 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Average
Non-Entitlement Areas of Georgia											
\$15,000 or Below	35.9%	38.2%	26.6%	33.2%	45.7%	35.2%	13.6%	12.7%	13.2%	9.6%	28.3%
\$15,001–\$30,000	23.3%	36.7%	29.1%	22.9%	24.7%	14.8%	6.1%	6.4%	8.3%	6.5%	20.8%
\$30,001–\$45,000	19.2%	33.1%	28.0%	16.3%	13.4%	9.4%	3.5%	4.1%	4.5%	3.6%	17.8%
\$45,001 –\$60,000	16.8%	29.9%	25.7%	14.1%	11.5%	7.6%	2.7%	2.7%	3.5%	2.7%	16.5%
\$60,001–\$75,000	14.1%	24.7%	23.2%	13.5%	8.7%	6.5%	1.7%	2.0%	2.3%	1.7%	13.8%
Above \$75,000	10.4%	18.1%	17.6%	10.0%	8.5%	6.5%	1.1%	1.3%	1.3%	1.0%	10.2%
Data Missing	15.9%	21.9%	33.3%	33.4%	17.0%	19.5%	0.7%	1.6%	3.2%	3.4%	25.1%
Average	16.2%	26.9%	23.8%	14.3%	12.0%	8.7%	2.9%	3.1%	3.5%	2.6%	15.2%
Entitled Areas of Georgia											
\$15,000 or Below	14.5%	22.0%	10.4%	14.4%	12.3%	9.1%	1.6%	1.7%	0.5%	3.0%	9.5%
\$15,001–\$30,000	17.8%	34.8%	27.2%	15.0%	13.5%	6.3%	0.4%	0.8%	1.0%	0.5%	14.4%
\$30,001–\$45,000	17.8%	37.7%	31.8%	13.9%	10.2%	5.0%	0.2%	0.6%	0.6%	0.3%	18.5%
\$45,001 –\$60,000	17.8%	36.2%	31.7%	14.6%	8.4%	3.3%	0.3%	0.3%	0.1%	0.2%	19.5%
\$60,001–\$75,000	16.6%	32.9%	30.5%	14.7%	6.4%	3.5%	0.1%	0.2%	0.2%	0.2%	18.1%
Above \$75,000	10.8%	21.7%	20.7%	10.1%	5.1%	3.0%	1.0%	0.8%	0.8%	0.6%	11.3%
Data Missing	18.1%	27.7%	38.5%	38.8%	5.4%	11.4%	0.9%	0.7%	1.8%	0.4%	28.6%
Average	15.3%	30.4%	27.4%	13.1%	7.5%	4.0%	0.6%	0.6%	0.6%	0.4%	15.9%
State of Georgia											
\$15,000 or Below	28.4%	33.6%	19.5%	27.0%	33.4%	22.4%	8.5%	8.0%	7.7%	7.2%	21.0%
\$15,001–\$30,000	21.0%	35.9%	28.3%	19.6%	19.6%	10.6%	3.3%	3.8%	4.8%	4.0%	18.0%
\$30,001–\$45,000	18.4%	35.7%	30.0%	15.1%	11.8%	7.1%	1.8%	2.4%	2.5%	2.1%	18.2%
\$45,001 –\$60,000	17.4%	33.6%	29.1%	14.3%	9.9%	5.4%	1.5%	1.6%	1.8%	1.4%	18.2%
\$60,001–\$75,000	15.6%	29.6%	27.5%	14.2%	7.5%	4.9%	0.9%	1.2%	1.2%	0.9%	16.2%
Above \$75,000	10.7%	20.4%	19.5%	10.1%	6.5%	4.4%	1.0%	1.0%	1.0%	0.7%	10.9%
Data Missing	17.3%	25.3%	36.4%	36.4%	11.4%	15.6%	0.8%	1.1%	2.2%	1.2%	27.2%
Average	15.7%	29.0%	25.9%	13.7%	9.6%	6.1%	1.6%	1.8%	1.9%	1.4%	15.6%

APPENDIX O. ADDITIONAL AFFH DOCUMENTATION

SUMMARY OF QUALIFIED ALLOCATION PLAN FOR LOW-INCOME HOUSING TAX CREDIT PROGRAM

DCA's Qualified Allocation Plan for Low Income Housing Tax Credit Program

- Summary of incentives for building in areas of low-poverty or high opportunity:
 - DCA provides up to 3 points for building in areas of low poverty, with urban thresholds of 5%, 10% and 15% poverty levels and rural thresholds of 15% and 20% poverty levels.
 - DCA provides up to 3 points for building in areas that rank in the highest demographic clusters defined by the Georgia Department of Public Health as having the greatest health outcomes. These measures include education level, job type, family type, race, age, and income.
 - DCA provides up to an additional 2 points for properties that meet the requirements in the previous two bullets and also pursue a mixed-income model of market and affordable apartments, with at least 15% market rate units.
 - DCA provides up to 2 points for building in areas that zone for schools that perform above the state average.
 - DCA provides up to 13 points for building within a close proximity to amenities such a grocery stores, parks, retail, medical services, or recreational centers. Undesirable surrounding land uses with a blighting or unsafe influence reduce this score.
- Summary of incentives for building in revitalization areas:
 - DCA provides up to 3 points for a development located within and contributing to a community revitalization or redevelopment plan.
 - DCA provides up to an additional 4 points for developments that meet the requirements in the previous bullet that also can display a confluence of positive factors such as local school improvement, local investment, or workforce development.
 - DCA provides 10 points for a development within a HUD Choice Neighborhood Implementation Grant award area.
 - DCA provides up to 2 points for brownfield remediation.
 - DCA provides 1 point for a development identified by a Georgia Initiative for Community Housing community as a priority within their housing or redevelopment plan.
- Tracking and recording local resistance to affordable housing, training developers, and providing a fair housing point of contact:
 - DCA maintains extensive records of every case of community support or resistance within the Housing Credit program, including grounds for resistance and the response of the relevant housing developer. DCA policy on the topic is located in the Qualified Allocation Plan section, Local Government Support and Community Engagement.
 - During the application process, applicants are able to communicate with DCA regarding instances of community resistance via formal communication to hfdround@dca.ga.gov.
- Manuals that cover Fair Housing

- Housing Credit manuals are intended to provide policy and instruction not already available through the Qualified Allocation Plan.
- Compliance Manuals provide guidance on fair housing records and cover fair housing topics several times throughout.
- The Market Study manual includes a fair housing reference.
- The Tax Credit manual includes a fair housing reference.
- The HOME Rental Housing Loan Program manual contains several fair housing references.
- The Relocation and Displacement manual includes multiple fair housing references.
- The Architectural Standards manual contains several fair housing references.
- The Accessibility Standards manual contains numerous fair housing references and exists to specifically inform applicant of fair housing requirements.
- The Appraisal manual references fair housing.
- Fair Housing training and approval, specifically regarding HCV discrimination and tracking
 - DCA disseminates Fair Housing brochures, informational packets and or other promotional materials to area housing counseling agencies, home buyer classes and in other housing workshops and conferences that DCA sponsors.
 - DCA requires all Low Income Housing Tax Credit (LIHTC) developments to comply with all applicable Federal and State accessibility laws and to retain a DCA qualified consultant to perform a pre-construction plan review and inspect the project at least 3 times during construction.
 - DCA provides annual fair housing training to property managers.
 - DCA site inspectors conduct accessibility checklist review during site visits.
 - Owners must report to DCA regarding the Affirmative Fair Housing Marketing Plan required in the QAP. Each property must confirm AFHMP use and record retention as part of the Annual Owner Certification.
 - Also as part of the Annual Owners Certification, each property confirms that vacancy advertising includes Equal Housing Opportunity advertising, that the property has received no fair housing discrimination findings, and that the owner is in compliance with Section 42(h)(6)(B)(iv)—that no applicants with a Section 8 Voucher or Certificate of Eligibility under Section 8 of the United States Housing Act of 1937, 42 U.S.C. 1437s were denied housing due to their status.
- Housing Data and Research Specialist position responsibilities
 - DCA has added this new position within the Housing Finance and Development team. The new staff member will specifically study the outcomes of DCA's affordable housing programs, such as the Housing Credit and HOME program. This position will use targeted research in areas such as fair housing and health impacts to inform future iterations of DCA housing policy.
- HUD Site and Neighborhood Standards
 - DCA requires that Housing Credit applicants receiving HOME funds must follow HUD Site and Neighborhood Standards

EXCERPT FROM FY2013-2017 CONSOLIDATED PLAN

I. Affirmatively Further Fair Housing

Georgia has a strong commitment to making decent affordable housing available to all residents. There are many programs established to meet a significant portion of the housing needs throughout the state. The State is fortunate that growth has been consistent in past years; nevertheless, the State has been proactive with implementing housing programs to facilitate access to available resources.

The State continues to pursue all available sources of funding for affordable housing activities to reduce the gaps and barriers to affordable housing such as the lack of fair housing policies and accessibility to transitional housing options. In addition, the State educates property owners, housing agencies, and citizens about fair housing laws.

To eliminate the affordable housing barriers, the State will continue to move in the directions to meet the needs of families in need for the federal programs offered to make their lives more enjoyable. Those steps include, but are not limited to the list below:

In addition to publicizing DCA's programs and services and providing appropriate auxiliary aids and services to individuals with disabilities, DCA is committed to a variety of outreach activities to persons with disabilities. These activities include marketing, programs targeted to those with disabilities, matching persons with disabilities with accessible housing units, criteria for funding selection weighted toward serving those with disabilities, research and technical assistance to facilitate access and services for individuals with disabilities, and DCA's treatment of its own staff through its human resource procedures.

The following describes several initiatives that demonstrate DCA's ongoing commitment to equal access for persons with disabilities.

1. Creation of a Disability Housing Coordinator Position at DCA

- Creating opportunities for expanding knowledge and understanding about issues pertinent to housing for individuals with disabilities through information sharing and distribution, relationship building, training and networking for and with people at all points through the housing spectrum, including DCA leadership and staff, builders, developers, local and state government officials, housing planners, lenders, and organizations representing people with disabilities and their families.
- Developing and coordinating programs and providing technical assistance designed to enhance awareness and understanding of the housing needs of individuals with mental, physical, and/or developmental disabilities and their families and expand the programs available to these targeted populations.

2. Creation of the Home Access Program

DCA identified that the architectural design of a home is a significant barrier to many individuals with disabilities being able to remain in their home, even when the home is affordable to them and the other services and supports necessary to live independently are available. As a result, DCA created the Home Access program to provide grant funding for the implementation of accessibility improvements at owner-occupied residences of individuals with a disability. DCA first began the program in 2002 and it now continues through a partnership with the Brain and Spinal Injury Trust Fund Commission (BSITFC).

3. Creation of GeorgiaHousingSearch.org

The GeorgiaHousingSearch.org provides an important tool to match available rental units to individuals and families needing this resource. Since its launch, the system has grown to include more than 180,000 units. DCA requires all developers of affordable rental units through its Low Income Housing Tax Credit program to list the portfolio of their properties in Georgia on the system.

Additionally, DCA also promotes its use with organizations serving the homeless or providing support services to individuals with disabilities and the service is translatable to over 71 languages at the simple click of a button.

One of the earliest disconnects identified by the Disability Housing Coordinator was the inability to link accessible rental units created by through DCA's Low Income Housing Tax Credit Program with those individuals who needed the accessibility features available in these units. Many accessible rental units were being created annually; however, these units were frequently occupied by individuals who did not require these features to live in the unit. Similarly, disability advocates noted the difficulty in identifying units with accessibility features.

As a result, DCA created the Rental Access Network (RAN) which provided a static, searchable database of affordable rental units. DCA quickly realized that the highest and best value was in a database that provides real-time listings of vacant units.

4. Creation of Choice Initiative under the Georgia Dream Homeownership Program

DCA offers the CHOICE Initiative, a down payment assistance/principal reduction program, to assist individuals with disabilities that, because of income considerations alone, could not afford to purchase a home in their community. Just as with any eligible home buyer, regardless of the existence of a disability, income and credit are the key issues to qualify for a home mortgage. However, individuals with disabilities have additional needs and issues which advocate for the provision of an enhanced amount of financial assistance beyond the traditional maximum cap that is available to traditional Georgia Dream borrowers.

- Collaborate with the Georgia Council on Developmental Disabilities, an advocacy group for individuals with physical disabilities and other nonprofit organizations to eliminate the barriers to purchasing a home and to improve access to affordable rental housing across the State.
- Promote homeownership awareness to Georgians interested in purchasing their homes and collaborate with a number of housing counseling agencies that work with specific non-English speaking populations to ensure their clients have access to this information as well.
- Collaborate with nonprofit agencies, lenders, and mortgage insurance companies who offer borrowers an opportunity to reduce cost and become successful homeowners.
- Implement the Continuum of Care Plan to provide a strong delivery system to meet the affordable housing and service needs of the state's homeless population.
- Continue the collaboration with the 11 local public housing authorities (Americus, Athens, Atlanta, Augusta, Brunswick, Columbus, Decatur, DeKalb, Hinesville, Macon and Marietta) to improve the services administered by National Housing Compliance.

In 2010, Georgia signed an Agreement with the U.S. Department of Justice to provide for more community based housing and supported services to persons with mental illness and persons with developmental disabilities. As a result, DBHDD is working to expand collaborative relationships with other state agencies and service providers to develop appropriate services and housing options to meet the needs of these individuals. The highlights specific targeted outcome measures for compliance in each of the five years included in the agreement.

DCA, in collaboration with the DBHDD and the Department of Community Health, the State Medicaid agency, have explored the options to promote the best practices for utilizing Medicaid waivers in the most cost effective way to provide housing-based support services for individuals that need supportive housing in the community. These strategies are listed below along with projected numbers to be served during State Fiscal Year 2013.

- DCA Housing Choice Voucher Set-Aside
- Shelter Plus Care Sponsor-based Expansion
- Section 811 Project-based Rental Assistance Funding
- Marketing of Tax Credit Units to Populations with Disabilities
- HOME Tenant-based Rental Assistance
- Outreach to Other Public Housing Agencies

DCA developed language for the Qualified Allocation Plan (QAP) for Low Income Housing Tax Credit Rental Housing, which set forth the policies regarding the allocation of federal and state tax credits for the development of affordable rental housing that would give developers an incentive to develop rental units targeted to special needs tenants, including persons with mental disabilities. The State continues to leverage all the available funding sources (mortgage revenue bonds, the federal Low Income Housing Tax Credits and Georgia Housing Tax Credits, and other non-federal resources) to accomplish the affordable housing objectives. In addition, the Housing Trust Fund for the Homeless funding is aimed to continue the efforts of service providers to assist the homeless and individuals with disabilities.

FAIR HOUSING CHOICE

DCA is issuing a Request for Proposals (RFP) from qualified consultants or organizations with experience in development of an AI for the State of Georgia. The AI is a review of impediments or barriers that affect the rights of fair housing choice. It covers public and private policies, practices, and procedures affecting housing choice. Impediments to fair housing choice are defined as any actions, omissions, or decisions that restrict, or have the effect of restricting, the availability of housing choices, based on race, color, religion, sex, disability, familial status, or national origin. The AI serves as the basis for fair housing planning, provides essential information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates, and assists in building public support for fair housing efforts. Conducting an analysis of impediments is a required component of certification and involves the following:

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

DCA intends to use these tools to identify barriers to affordable housing choice so that it can be proactive in fashioning ways to help promote fair housing choice and achieve the objectives under the Fair Housing laws. The AI should have the necessary analysis and possible solutions to barriers to AFFH to enable the State to evaluate whether the programs established and administered by its awardees are meeting the requirement to AFFH and to identify steps which the State can take directly to AFFH. These actions should help the State identify and prevent discriminatory effects on individuals in protected classes as defined by the Fair Housing Act.

The AI will evaluate all the areas of the State to AFFH by:

- Conducting an analysis to identify impediments to fair housing choice within the State;
- Taking appropriate actions to overcome the effects of any impediments identified through the analysis;
- Maintaining records reflecting the analysis and actions in this regard; and

- Assuring that units of local government funded by the State comply with their certifications to affirmatively further fair housing, in accordance with 24 CFR §570.487(b)(1)-(4).

The State is in the process of procuring a qualified organization or agency to update the Analysis of Impediments to Fair Housing Choice for the annual action plan federal fiscal year 2014. The current AI study is available on the State's webpage at:

<http://www.dca.ga.gov/communities/CommunityInitiatives/programs/Impediments.asp>

Affirmative Marketing Efforts

The Affirmative Fair Housing Marketing Plan (AFHMP) guides HUD's effort to ensure that prospective funding recipients will follow the Affirmative Fair Housing Marketing Regulations found in the Code of Federal Regulations (section 24 CFR 200.600, Subpart M). This requires each applicant to develop, and put in place an affirmative program that will attract potential consumers or tenants of all minority and non-minority groups within the housing market, regardless of race, color, religion, sex, national origin, disability, or familial status. The purpose of such programs is to provide services designed to affirmatively further the fair housing objectives stated in **Title VIII of the Fair Housing Act**.

Each applicant is to pursue affirmative fair housing marketing policies by seeking out possible buyers and tenants, and advertising available housing properties. Examples of such action include:

- Advertising the availability of housing to the population that is less likely to apply, both minority and non-minority groups, through various forms of media (i.e. radio stations, posters, newspapers) within the marketing area
- Use of the **Equal Housing Opportunity Logo** and the equal housing opportunity statement
- Educate persons within an organization about fair housing and their obligations to follow nondiscrimination laws
- Conduct outreach to advocacy groups (i.e. disability rights groups) on the availability of housing

The effort to meet the annual goals and objectives relied heavily on the State's attempt to effectively market the programs offered through the HUD programs by local governments, nonprofits, for-profit developers, and public housing authorities. Recipients of the CHIP and Rental Housing programs developed and implemented both the Affirmative Fair Housing Marketing (AFHMP) and a Minority Business Enterprise/Women Business Enterprise (MBE/WBE) outreach plan that was reviewed by the State.

The affirmative marketing plan must meet each of the following criteria:

- Specify a method by which the owner will inform potential residents about fair housing laws;
- Solicit applications from persons not likely to apply without special outreach by at minimum posting and/or distributing information on the project in such places as community organizations, places of worship employment centers, fair housing groups and housing counseling agencies;
- Require the use of the Equal Housing Opportunity (EHO) logo or slogan in any press releases or written materials distributed by or on behalf of the owner;
- Require the recipients of HOME funds to maintain records of efforts under the affirmative marketing plan and the results of said efforts; and,
- Require the recipient to assess annually their affirmative marketing efforts and describe the method of self-assessment used.

DCA reviews and approves all marketing and outreach plans before any written agreements are executed or funds are disbursed. The affirmative marketing policy shall consist of the following elements:

- Method for informing the public, owners, and potential tenants about federal fair housing laws and the participating jurisdiction's affirmative marketing policy requirements which may include, but are not limited to, providing a copy of this policy to be used in all media releases, using the Equal Housing Opportunity logo and slogan in all media releases, and explaining the general policy to the media, property owners, and tenants involved with the HOME program
- Requirements and practices each owner must adhere to in order to carry out the affirmative marketing procedures and requirements. When advertising for a HOME property, recipients may use commercial media (newspaper or television) or local community contacts, but should utilize the Equal Housing Opportunity logo or slogan and always use caution when documenting affordable housing (income and rent restrictions).
- Procedures used by owners to inform and solicit applications from persons in the housing market areas that are not likely to apply for the housing without special outreach. These persons most likely include those who are not the race/ethnicity of the residents of the neighborhood in which the unit is located.
- Records that will be kept describing actions taken by HOME grantees and by owners to affirmatively market units and records to assess the results of these actions.

Steps taken to address the corrective actions to improve the affirmative marketing actions are unacceptable. DCA will review the records annually to ensure the grantee or owners are making the appropriate efforts pursuant to the regulations. An agreement must be binding for a period (during the affordability period of the units).

EXCERPT FROM FY2013 CONSOLIDATED ANNUAL PERFORMANCE EVALUATION REPORT

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICES

Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91 .520(a)

The Georgia Commission of Equal Opportunity (GCEO) collaborated with DCA to provide educational and outreach activities, receive complaints, conduct investigations, provide fair housing training and initiative the enforcement of the Georgia Fair Housing Law. During the 2013 program year, GCEO processed 36 complaints to refer to the appropriate agency for investigation to affirmatively further fair housing. Printed materials are available on the website at www.dca.ga.gov.

Impediment #1: The general public and local government officials lack knowledge about the requirements of the fair housing laws and resources available to remedy violations.

- DCA has adopted a Fair Housing statement and designated a Fair Housing Resource Center on its website. In order to ensure greater access to this resource, DCA created a domain name – fairhousinggeorgia.com – which directs users directly to DCA's Fair Housing Statement web page that provides information on Fair Housing, Reasonable Accommodation, Language Access Resources, Filing a Fair Housing Complaint, and Grievance Procedures associated with DCA funded programs.
- The Georgia Initiative for Community Housing (GICH) - a partnership of the Georgia Department of Community Affairs, the Georgia Municipal Association, and the University of Georgia Family and Demographics Research Center – provides a three year program of facilitated retreats and technical assistance to local government staff for the purpose of developing strategy to address housing needs.
- DCA's Fair Housing committee promoted Fair Housing Month in April. The objective of this Committee is to improve DCA's promotion of Fair Housing throughout Fair Housing month and delivery throughout the year, especially to those in under-served populations. Objectives include:
 - Incorporating a Banner promoting FAIR HOUSING Month on DCA's website in April
 - Delivering fair housing materials through DCA's Housing Outreach and Team Georgia Managers to consumers, developers, and other partners throughout the year
 - Ensuring DCA's Fair Housing message is being conveyed through each DCA Division's Constant Contact data base, and press releases to our media outlets
 - Employing Radio and newspaper advertisements targeted to areas of under-served populations promoting Fair Housing during Fair Housing month.
- DCA contracted with Nan McKay, to provide an extensive all day seminar on fair housing laws and practices for over 150 staff and Board members in Macon on April 17, 2014.
- DCA distributes a tenant resource guide, the Landlord-Tenant Handbook developed in conjunction with Georgia Legal Services Program, Inc. A total of 811 copies were distributed during the program year.
- DCA disseminated the Fair Housing brochures and program information to area housing counseling agencies, home buyer classes and in other housing workshops and conferences that DCA sponsors.
- DCA implemented an updated Fair Housing Outreach Plan, Effective Communication Plan and Language Access Plan to increase public awareness of DCA resources and provide outreach to underserved populations.

Impediment #2: People with disabilities have difficulty finding suitable, accessible housing.

- DCA's CHOICE initiative provided down payment assistance in the amount of \$387,500 in 2013 resulting in 55 persons with disabilities becoming first time home buyers.
- DCA continued its established partnership with the Brain and Spinal Injury Trust Fund Commission (BSITFC) to complete accessibility modifications using the resources of the BSITFC. During Federal Fiscal Year 2013, the partnership assisted 12 homeowners, providing \$107,309 in resources.
- DCA has completed the construction of 685 units of supportive housing that provides a critical means for individuals with disabilities who are homeless to create the secure environment for their independence in the community.
- DCA has a designated staff Disability Housing Coordinator that participated in a wide-array of networking and meeting opportunity with organizations across Georgia that include but are not limited to:
 1. Creating opportunities for expanding knowledge and understanding about issues pertinent to housing for individuals with disabilities through information sharing and distribution, relationship building, training and networking for and with people at all points through the housing spectrum, including DCA leadership and staff, builders, developers, local and state government officials, housing planners, lenders, and organizations representing people with disabilities and their families.
 2. Developing and coordinating programs and providing technical assistance designed to enhance awareness and understanding of the housing needs of individuals with mental, physical, and/or developmental disabilities and their families.

Impediment #3: For Hispanics, language barriers and unfamiliarity with the home buying process are catalysts for discrimination.

- DCA provides an on-line resource, GeorgiaHousingSearch.org website, which provides property managers with a tool to market affordable rental units and offers a convenient resource to prospective renters to locate affordable and accessible housing and obtain additional community resource information. This website is free, searches not only in English and Spanish but in over 80 languages
- The State of Georgia has identified 18 counties where LEP populations exceed the Department of Justice's Safe Harbor 5% threshold.

County	Total Population	Total LEP Population	Language (name)	Language (number)	Language (% of total pop)
Atkinson County	7,600	800	Spanish	800	10.1
Clayton County	238,600	25,800	Spanish		6.9
Cobb County	634,900	50,400	Spanish	34,300	5.4
Colquitt County	41,300	4,200	Spanish	3,900	9.5
DeKalb County	639,100	57,900	Spanish	33,900	5.3
Echols County	3,700	1,100	Spanish	1,100	30.2
Evans County	10,100	700	Spanish	700	6.9
Gilmer County	26,500	1,600	Spanish	1,600	6
Gordon County	50,600	4,100	Spanish	3,800	7.5
Grady County	23,000	1,400	Spanish	1,300	5.8

County	Total Population	Total LEP Population	Language (name)	Language (number)	Language (% of total pop)
Gwinnett County	731,200	116,900	Spanish	70,900	9.7
Habersham County	39,900	2,700	Spanish	2,200	5.6
Hall County	163,700	24,500	Spanish	23,100	14.1
Murray County	36,900	2,600	Spanish	2,500	6.6
Polk County	38,000	2,400	Spanish	2,200	5.7
Telfair County	15,300	1,300	Spanish	1,200	8
Tift County	37,200	2,300	Spanish	2,000	5.3
Whitfield County	92,800	15,900	Spanish	15,200	16.4

- DCA continues to actively market its Georgia Dream first and second mortgage programs to real estate and mortgage companies operating in neighborhoods with high minority concentrations.

In addition the aforementioned actions listed above, DCA continues to integrate strategies and housing initiatives for areas with persistent poverty and minority concentrations.

1. Integration Strategies within the Low Income Housing Tax Credit Program
2. Collaborative initiatives to assist individuals with re-entry into society from the Georgia correctional facilities
3. Department of Juvenile Justice Youth Reentry Task Force: The Department of Juvenile Justice (DJJ) established this Task Force in March 2014 to leverage resources of participating entities to create a better outcome for youth
4. Re-Entry Partnership Housing (RPH): A unique collaboration within the state government, the RPH program provides short-term financial assistance to provide housing for inmates who remain in prison after the Parole Board has authorized their release due solely to having no residential options.
5. DCA provided Spanish translations of sample Public Hearing announcements for use by CDBG applicants in their Citizen Participation efforts.

EXCERPT FROM FY2014 STATE ANNUAL ACTION PLAN

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Impediment #1: The general public and local government officials lack knowledge about the requirements of the fair housing laws and resources available to remedy violations.

1. DCA has created a domain name – fairhousinggeorgia.com – which directs users directly to DCA's Fair Housing Statement web page that provides information on Fair Housing, Reasonable Accommodation, Language Access Resources, Filing a Fair Housing Complaint, and Grievance Procedures associated with DCA funded programs.
2. The Georgia Initiative for Community Housing (GICH) - a partnership of the Georgia Department of Community Affairs, the Georgia Municipal Association, and the University of Georgia Family and Demographics Research Center – provides a three year program of facilitated retreats and technical assistance to communities developing a strategy to address housing needs. As part of the September 2013 retreat, 10 communities heard a presentation on fair housing made by Mr. Lyonel LaGrone with Metro Fair Housing Services, Inc. Mr. LaGrone provided training of the fair housing law and responsibilities under the Fair Housing Act.
3. DCA formed a committee to promote Fair Housing in the month of April. The objective of this plan is to improve DCA's promotion of Fair Housing throughout Fair Housing month and delivery throughout the year, especially to those in under-served populations. Several objectives are either underway or being considered:
 - A Banner for FAIR HOUSING on DCA website in April
 - The Housing Outreach and Team Georgia Managers will deliver Fair Housing materials to consumers, developers, and other partners throughout the year
 - Ensure DCA Fair Housing message is being conveyed through each departments Constant Contact data base, and press release to our media outlets
 - Consider radio or newspaper advertisements in these areas of under-served populations
4. DCA distributes a tenant resource guide, the Landlord-Tenant Handbook developed in conjunction with Georgia Legal Services Program, Inc. A total of 625 copies were distributed during SFY2013. DCA also provides information to tenants through a designated email address at rentalhousing.com.
5. DCA disseminated the Fair Housing brochures, informational packets and or other promotional materials to area housing counseling agencies, home buyer classes and in other housing workshops and conferences that DCA sponsors.
 - CDBG grant recipients receive fair housing brochures, posters or other printed material with the request to display them in a prominent location for public access
6. CDBG Applicants' Workshop held on December 11-13, 2013. Information presented at that workshop specifically provides Technical Assistance in the availability of funding, application process and requirements for all federal regulations related to projects using CDBG funds. Among topics covered are requirements for local governments to Affirmatively Further Fair Housing, including specific presentations regarding FHEO, Section 3, and Section 504 compliance. Materials presented at this workshop may be found at:

<http://www.dca.ga.gov/communities/CDBG/programs/CDBGAppToolkit.asp>
7. CDBG Recipients' Workshop held on September 5-6, 2013. Information presented at that workshop specifically provides Technical Assistance in the requirements for all federal regulations related to implementation of projects using CDBG funds. Among topics covered are requirements for local governments to Affirmatively Further Fair

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Housing, including specific presentations regarding FHEO, Section 3, and Section 504 compliance. Materials presented at this workshop may be found at: <http://www.dca.ga.gov/communities/CDBG/programs/CDBG.asp>

8. Fair Housing Training for ESG Grantees was conducted in May 2014 by Teresa Chappell of Georgia Commission on Equal Opportunity for areas pertaining to emergency shelter, transitional housing, rapid re-housing, hotel/motel vouchers and prevention funds. This is different from the accessibility trainings that are currently offered as these will speak to the state and federal laws to make sub-grantees aware of client rights and agency obligations for advocacy.
 - Additional training will occur on May 13th Macon (35 recipients) and on May 23rd in Marietta (Atlanta MSA) (34 recipients).
 - On June 3, 2014 – Fair Housing Accessibility First Training promoted by HUD, and co-sponsored by DCA, the State ADA Coordinator's Office, Metro Fair Housing Services, State Fire Marshall, Statewide Independent Living Council, and the SOPOS Coalition. The event will promote compliance with the Fair Housing Act design and construction requirements. As of May 9, 2014, 60 participants registered. The training will be held at the Georgia Public Safety Training Center in Forsyth.
9. With CHIP, subrecipients are required to submit affirmative marketing plans for approval for all applicable housing activities

Impediment #2: People with disabilities have difficulty finding suitable, accessible housing.

1. DCA's Georgia Dream program provides enhanced down payment assistance through the CHOICE initiative (assisting individuals with disabilities) and provided 55 loans, totaling \$387,500 in fiscal year 2013.
2. In 2001, DCA partnered with the Governor's Council on Developmental Disabilities (now known as the Georgia Council on Developmental Disabilities) to create and maintains a position at DCA focused on:
 - Creating opportunities for expanding knowledge and understanding about issues pertinent to housing for individuals with disabilities through information sharing and distribution, relationship building, training and networking for and with people at all points through the housing spectrum, including DCA leadership and staff, builders, developers, local and state government officials, housing planners, lenders, and organizations representing people with disabilities and their families.
 - Developing and coordinating programs and providing technical assistance designed to enhance awareness and understanding of the housing needs of individuals with mental, physical, and/or developmental disabilities and their families.
 - Additionally for FY 2013, the Disability Housing Coordinator participated in a wide-array of networking and meeting opportunities with organizations across Georgia, including:
 - Statewide Independent Living Council
 - Georgia Council on Developmental Disabilities, serving as the DCA Commissioner's representative to the Council since 2009.
 - Georgia Financial Literacy Consortium
 - Georgia Emergency Management Agency Disaster Response Team
 - Money Follows the Person Advisory Board
 - Mental Health Planning Advisory Council

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- Brain and Spinal Injury Trust Fund Commission
 - Olmstead Planning Committee
 - Georgia Alliance to End Homelessness
 - Georgia Department of Behavioral Health and Developmental Disabilities Coordinating Council
 - Atlanta Regional Commission Housing Forum
 - State Interagency Council on Homelessness
 - Health Transition Initiative Advisory Council
 - Metro Fair Housing, Inc.
 - Governor's Office of Transition, Support and Re-Entry Housing Committee
 - Cooperative Agreement to Benefit Homeless Individuals (CABHI) Cooperative Agreement Committee – focuses on homeless individuals with substance abuse and co-occurring issues of substance abuse and mental health
3. DCA established a partnership with the Brain and Spinal Injury Trust Fund Commission (BSITFC) to complete accessibility modifications using the resources of the BSITFC. During State FY2014, the partnership assisted 12 homeowners, providing \$107,309 in resources.
 4. DCA implemented the HOME-Funded Permanent Supportive Housing Program. Supportive housing provides a critical means for individuals with disabilities who are homeless to create the secure environment for their independence in the community. Since its inception, DCA has completed the construction of 685 units of supportive housing, with an additional 59 currently under construction following the closure of two construction loans in 2014.
 5. In 2012, DCA created a Strategic Housing Plan to Improve Housing Options for Persons with Disabilities Qualified under the State's Settlement Agreement and the Money Follows the Person Program. DCA contracted with the Technical Assistance Collaborative (TAC) to provide input and facilitate DCA in its crafting of a strategic plan for the use of its housing resources to expand housing options for people with disabilities eligible under either the State's Settlement Agreement with the U.S. Department of Justice and the Money Follows the Person Initiative administered by the Georgia Department of Community Health. As it developed this strategic plan, DCA solicited input from for-profit and nonprofit housing developers, service providers to individuals with disabilities, and state agencies (Department of Corrections, State Board of Pardons and Paroles) to garner input on issues affecting both population groups. Additionally, DCA sought input throughout the process from its state agency partners, the Georgia Department of Behavioral Health and Developmental Disabilities and the Georgia Department of Community Health, to ensure that its strategies would benefit the targeted population. DCA, DCH, and DBHDD officials continue to meet quarterly regularly to implement this strategy.
 6. In 2013, DCA was awarded \$4.2 million in resources through the Section 811 Project Rental Assistance Demonstration program to foster the transition of individuals from institutional settings to integrated housing opportunities. The State of Georgia's partnership between DCA, the Department of Community Health, and the Department of Behavioral Health and Developmental Disabilities will target individuals eligible under the State's Settlement Agreement with the US Department of Justice as well as individuals eligible under the Money Follows the Person Initiative. The State is currently taking steps to implement the program pending receipt of a Collaborative Agreement with HUD.

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The State is also submitting an application for funding to HUD in May 2014 that if successful, will expand the state's initiative from approximately 135 units to nearly 500.

7. Housing Persons with Disability Strategies within the Low Income Housing Tax Credit Program
 - *The QAP provides a point preference for Integrated Supported Housing.*
 - Example: Points will be awarded to an Application that agrees to accept government project-based rental assistance for up to 15% of the units for the purpose of providing integrated housing opportunities to a target population which includes individuals with mental illness, as defined in the Settlement Agreement between the State of Georgia and the Department of Justice (#1:10-CV-249-CAP) and to individuals eligible to participate in the Money Follows the Person program.
 - *The QAP provides a Threshold requirement that all funded Projects Market to Persons with Disabilities*
 - Example: This section is designed to foster development of affordable housing units for tenants with disabilities or homeless populations. All projects selected for funding (regardless of their tenancy) must demonstrate a willingness to initiate marketing of units to these populations. Each project selected for an award of credits must prepare and submit a Marketing Plan outlining how the project will market units to tenants with special needs. The Plan must be submitted prior to issuance of 8609s. At a minimum, Marketing Plans must include:
 - a. The Marketing plan must incorporate outreach efforts to each service provider, homeless shelter or local disability advocacy organization in the county in which the project is located.
 - b. Affirmatively market to persons with disabilities and the homeless.
 - c. Must establish and maintain relationships between the management agent and community service providers.
 - d. Include a referral and screening process that will be used to refer tenants to the projects, the screening criteria that will be used, and make reasonable accommodations to facilitate the admittance of persons with disabilities or the homeless into the project.
 - e. Requires marketing of properties 2-4 months prior to occupancy to underserved populations
 - f. Applications for affordable units shall be made available to public locations including at least one that has night hours.

*The QAP requires that before an applicant submits an application; all projects owned by the applicant must be entered into Georgia Housing Search.

8. Accessibility Requirements in the Low Income Housing Tax Credit Program

All projects that receive allocations or funding under the Plan must comply with all applicable Federal and State accessibility laws including but not limited to: The Fair Housing Amendments Act of 1988, Americans with Disabilities Act, Section 504 of the Rehabilitation Act of 1973, Georgia Fair Housing Law and Georgia Access Law as set forth in the 2014 Accessibility Manual. When two or more accessibility standards apply, the applicant is required to follow and apply both standards so that a maximum accessibility is obtained.

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1. Elevators must be installed for access to all units above the ground floor
2. Buildings more than two story construction must have interior furnished gathering areas in several locations in the lobbies and/or corridors
3. 100% of the units must be accessible and adaptable, as defined by the Fair Housing Amendments Act of 1988

Each project selected for allocation is required to retain a DCA qualified consultant to monitor the project for accessibility compliance. The consultants must perform a pre-construction plan review and inspect the project at least 3 times during construction to monitor grading operations, framing, and final compliance. DCA must be copied on all reviews/reports.

Impediment #3: For Hispanics, language barriers and unfamiliarity with the home buying process are catalysts for discrimination.

1. DCA provides an on-line resource, GeorgiaHousingSearch.org website, which provides property managers with a tool to market affordable rental units and offers a convenient resource to prospective renters to locate affordable and accessible housing and obtain additional community resource information. This website is free, searches not only in English and Spanish but in over 80 languages, and the site is updated by owners/property managers at least bi-weekly with vacancy information.
 - DCA provided Spanish language materials and workbooks and offered Spanish translation compatibility on the GeorgiaHousingSearch.org website.
 - For the period of July 1, 2012 – June 30, 2013 there were 1,952,372 searches completed on Georgia Housing Search.
 - The total number of units on Georgia Housing Search at the end of this state fiscal year was 183, 243. At the beginning of this fiscal year, we had 175,284 units on the site and this represents an increase of 7,959 units added to the site over this period.
2. The State of Georgia has identified 18 counties where LEP populations exceed the Department of Justice's Safe Harbor 5% threshold¹.

County	Total Population	Total LEP Population	Language	Language LEP #	LEP % Total Pop
Atkinson County	7,600	800	Spanish	800	10.1
Clayton County	238,600	25,600	Spanish		6.9
Cobb County	634,900	50,400	Spanish	34,300	5.4
Colquitt County	41,300	4,200	Spanish	3,900	9.5
DeKalb County	639,100	57,900	Spanish	33,900	5.3
Echols County	3,700	1,100	Spanish	1,100	30.2
Evans County	10,100	700	Spanish	700	6.9
Gilmer County	26,500	1,600	Spanish	1,600	6
Gordon County	50,600	4,100	Spanish	3,800	7.5
Grady County	23,000	1,400	Spanish	1,300	5.8
Gwinnett County	731,200	116,900	Spanish	70,900	9.7
Habersham County	39,900	2,700	Spanish	2,200	5.6

¹A "safe harbor" means that if a recipient provides written translations under these circumstances, such action will be considered strong evidence of compliance with the recipient's written translation obligations.

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County	Total Population	Total LEP Population	Language	Language LEP #	LEP % Total Pop
Hall County	163,700	24,500	Spanish	23,100	14.1
Murray County	36,900	2,600	Spanish	2,500	6.6
Polk County	38,000	2,400	Spanish	2,200	5.7
Telfair County	15,300	1,300	Spanish	1,200	8
Tift County	37,200	2,300	Spanish	2,000	5.3
Whitfield County	92,800	15,900	Spanish	15,200	16.4

- DCA continues to actively market its Georgia Dream first and second mortgage programs to real estate and mortgage companies operating in neighborhoods with high minority concentrations.

Impediment #4: For area of racial and ethnic minority concentration and people facing conditions of persistent poverty.

Integration Strategies within the Low Income Housing Tax Credit Program

- The QAP limits priorities for development in low income neighborhoods to those that have neighborhood revitalization efforts with a real chance of success.

Example: QAP requires an analysis of neighborhood revitalization efforts in Community Revitalization Plans

- The QAP creates incentives for locating projects in high opportunity neighborhood areas. Georgia is one of only 12 states to provide these incentives.

Example: The QAP gives points for projects that are located in Stable Neighborhoods. (Projects that are located in a census tract that have low poverty rates and is designated middle or upper income levels in the most recent FFIEC.)

QAP gives points to an Application proposing to preserve a Family property which is located in the attendance zone of a High-Performing School Zone (this is limited to elementary schools).

- Changed QAP provisions that blocked projects from being developed in high opportunity neighborhoods.

Example: Points for resolution of support eliminated. Local Government opposition that appears to be discriminatory or violate fair housing laws will not be grounds for failure of a project.

- The QAP creates incentives to target the lowest income Georgia residents.

Example: Applications that agree to set gross rents and income limits for at least 15% of the total residential units at or below 30% of 50% AMI shall be awarded three points in the Deeper Targeting category.

- Strategies within the Low Income Housing Tax Credit Program for Rural Incentives

- 30% of each year's award must be allocated to projects in rural areas
- Rural Projects are given preference for HOME Funds

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Other Activities:

1. Planning for community development activities
 - CDBG has two specific designations, Revitalization Area Strategy (RAS) and Opportunity Zones (OZ) that are designed to align with HUD's Fair Housing Guide. These incentives are designed to reward local governments that are implementing comprehensive community revitalization
 - CDBG also rewards communities that undertake additional community efforts along with their CDBG funding with an enhanced strategy score.
2. CDBG has partnered with the State ADA Coordinator's office to develop a pilot project starting with use of CDBG programs to ensure compliance with applicable ADA regulations. The ultimate goal of the PILOT project is to provide DCA a framework for providing greater access to affordable housing options to eligible Georgians with disabilities.
3. CDBG Staff provided assistance in writing and editing the DCA Effective Communication Policy and Language Access Plan.
4. CDBG staff provided Spanish translations of sample Public Hearing announcements for use by CDBG applicants for use in their Citizen Participation efforts.
5. CDBG staff attended specialized trainings on AFFH. These included trainings by the State's ADA coordinator, the Georgia Commission on Equal Opportunity and Motivation, Inc. (Section 3 Training).
6. CDBG has appointed two 504 coordinators.
7. CDBG has actively participated in continuous improvement teams designed to improve access to DCA's services and more specifically with preparing to update the AI and the department's Section 3 policies.
8. In accordance with HUD's Fair Housing Planning Guide (see Chapter 5: Detailed Discussion of AI Areas For Entitlement, State, and State-Funded Jurisdictions), the state's Method Distribution encourages neighborhood revitalization as an important aspect of fair housing choice in the following ways:
 - The Method of Distribution emphasizes meeting the public health and safety needs of low- to moderate-income people, leading to greater access to public services such as municipal utilities and other vital services such as health and mental health services.
 - The Method of Distribution provides an incentive through the Revitalization Area Services (RAS) designation for communities to plan holistically for the community development needs of low- to moderate-income people by encouraging partnerships with service providers, private organizations, and both public and private funders. See the following link for further details:
<http://www.dca.ga.gov/communities/CDBG/programs/CDBGremitApproval.asp>.
9. CDBG administers the Opportunity Zone program that provides state tax incentives for businesses in areas in need of revitalization, creating jobs in locations that are near to low- to moderate-income communities and alleviating transportation barriers to jobs.
10. CDBG encourages and provides advice and assistance the use of state redevelopment tools such as the Urban Redevelopment Law (O.C.G.A. 36-61), the State Enterprise Zone Law (O.C.G.A. 36-88) and others.
11. Compliance Monitoring Team activities:
 - Monitoring tools and program guides have been updated to include Fair Housing requirements. Grantees have been brought up to date on requirements as well

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What	When	Group/ Division	Notes/ Comments
RAD Fair Housing Training	17-Apr-14	MF	
Fair Housing Training Workshop	May , 2014	S+C	materials can be found at: http://portal.dca.ga.gov/divisions/hfd/OSH/Shared%20Documents/Forms/AllItems.aspx?RootFolder=%2Fdivisions%2Fhfd%2FOSH%2FShared%20Documents%2FAir%20Housing%20Records&View=%7b5706D331%2d5B2A%2d48F1%2d81B7%2d2367146E7AC6%7d
Translation Services	15-Mar-13	DCA Admin Services	Statewide translation (interpretative) services, documentation is available for review
Section 3 Training	15-Apr-13	Cross-divisional	A hard copy of the list of attendees and presentation are available for review
504 Self Assessment Training	16-Apr-13	Cross-divisional	A hard copy of the list of attendees and presentation are available for review
State ADA Training (Best Practices)	28-Apr-13	Cross-divisional	Best practices training for staff that meet, greet or interact with persons that have a disability. A hard copy of the list of attendees and presentation are available for review.
Fair Housing Audit Training	6-May-13	Cross-divisional	Preparation for the DCA fair housing audit
GCEO Training	13-May-13	Cross-divisional	Training regarding the protected classes and how the GCEO investigates fair housing complaints
Analysis of Impediments to Fair Housing	May 20 & 28, 2013	Cross-divisional	Overview of the AI, the purpose, the associated regulations and current results
Section 3 Training (w/ K. Swiney)	23-May-13	Cross-divisional	A hard copy of the list of attendees and presentation are available for review
DCA Unified Management Systems	Aug-13	Cross-divisional	Four teams identified during the Fair Housing Audit: Reaching every corner of Georgia, Employment and Contract Opportunities, Planning to Overcome Impediments to Fair Housing and Continuous Improvement of Access to DCA Programs and Resources. These groups are still active.
Fair Housing Training	17-Apr-14	CDBG	Staff attended training
AFFH Lunch and Learn	24-Apr-14	Cross-divisional	Staff attended the Lunch and Learn session held at DCA

HAS YOUR RIGHT TO FAIR HOUSING BEEN VIOLATED?

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

The United States Department of Housing and Urban Development

National Office:

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>

Atlanta Regional Office

U.S. Department of Housing and Urban Development Southeast Office
 40 Marietta Street
 Atlanta, GA 30303

Telephone: (404) 331-5001

Website: <http://www.HUD.gov>

Residents of the State of Georgia contact:

Georgia Commission on Equal Opportunity

7 Martin Luther King, Jr. Drive, Southeast
 3rd Floor, Suite 351
 Atlanta, Georgia 30334

Telephone: (404) 656-6003

Toll Free: 1(800) 473-OPEN(6736)

FAX: (404) 656-4399

Online Complaint Form: <http://gceo.state.ga.us/to-file-a-complaint/>.

Residents of the Atlanta metropolitan area contact:

Metro Fair Housing Services

175 Trinity Avenue Southwest
 Atlanta, Georgia 30303

Telephone: (404) 524-0000

FAX: (404) 524-0005

<http://www.metrofairhousing.com/contact.htm>

Residents of Savannah-Chatham County contact:

Savannah-Chatham Fair Housing Council

1900 Abercorn Street
 Savannah, Georgia 31401

Telephone: (912) 651-3136

FAX: (912) 651-3137

