

The City of Oak Ridge, Tennessee



Analysis of Impediments to Fair Housing

April 9, 2015

This report was prepared by the Community Development Department, in accordance with the Consolidated Planning Regulation; 24 CFR Part 9.

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I. Executive Summary

The City of Oak Ridge, Tennessee's Community Development Department initiated an update to their Analysis of Impediments (AI) to Fair Housing Choice in February 2015. The U.S. Department of Housing and Urban Development (HUD) requires all state and local governments that receive Community Development Block Grant (CDBG) federal funding to conduct an AI in conjunction with the Consolidated Plan every three to five years in order to understand the various changing issues facing their community. HUD is committed to "eliminating racial and ethnic segregation, illegal physical and other barriers to persons with disabilities and other discriminatory practices in housing."¹

The City of Oak Ridge is dedicated to fairly analyzing and eliminating housing discrimination, promoting fair housing choices, ensuring structurally sound and accessible housing for everyone, providing opportunities for inclusive housing occupancy, particularly persons with disabilities, and fostering compliance with the nondiscrimination provisions of the Fair Housing Act.

This Analysis of Impediments document is a summary of housing and housing-related practices evident throughout the community that inadvertently or deliberately prevent people from living where they choose. Some common factors that might limit housing choice include:

- Discrimination based on race, color, national origin, sex, religion, familial status, and disability;
- Lack of affordable housing (to own or rent);
- Lack of housing that is accessible to those holding Section 8 vouchers due to discrimination and holds on vouchers;
- Location of jobs, or access to jobs and availability of housing in the area;
- Lack of reasonable and accessible transportation services;
- Inability to obtain a mortgage;
- Inability to obtain homeowner's insurance based on the location of a home.

This AI process for the City of Oak Ridge resulted in the following impediments being recognized as those most prevalent in the community:

- Lack of awareness and education about fair housing laws and the process for discrimination complaints;
- Inadequate number of quality housing options for low income households;
- Accessibility issues for people with physical disabilities;
- No transitional housing available for individuals and families who are in emergency/crisis situations;
- No public transportation options for citizens to access resources.

In summary, some recommended strategies for dealing with the identified impediments include:

- Make fair housing information easily accessible on the City's website (in other languages as well, such as Spanish, etc.);
- Establish a housing marketing plan for the City's housing programs to help increase awareness among protected classes, including the use of ethnic and local news/media sources (TV/radio);
- Continue to fund quality affordable housing projects using CDBG funds, and leverage those funds and potentially other government funds, to increase the variety and affordability of housing that is suitable for different types of households;

¹ Fair Housing Planning Guide, vol. 1. March 1996. HUD-1582B-FHEO. Document can be found: <http://www.hud.gov/offices/fheo/images/fhpg.pdf>

- Assist in building partnerships to help gain funding to support a transitional housing program/facility for individuals and families;
- Ensure that accessibility standards are being adhered to in new developments and encourage landlords and homeowners to work with the City in finding programs and opportunities to remodel existing developments to incorporate accessibility;
- Assist in finding innovative approaches to address public transportation needs and promote current public transportation options for citizens who need access to transportation;
- Continue an active Board of Building and Housing Codes Appeals, whereby charges of housing discrimination can be addressed;
- Certification by the Mayor that the City of Oak Ridge affirmatively furthers fair housing.

II. Introduction

Fair housing describes the right of individuals to obtain housing of their choice, free from discrimination based on race, color, religion, sex, disability,² familial status,³ or national origin. This right is assured by the federal Fair Housing Act, as amended and other legislation which makes it unlawful to discriminate in the sale, rental, financing, and insuring of housing. HUD requires that all governing authorities that prepare a consolidated plan in order to receive HUD funds certify that they will “affirmatively further fair housing” within their jurisdictions.

Even when a community supports the idea of fair housing for all people; the community must also take special measures to afford all citizens the opportunity to live in housing of their choosing. An Analysis of Impediments to Fair Housing is a review of a community’s policies, procedures, laws, and allowances – both public and private – that might impact a person’s ability to choose housing of his or her choice without regard to their membership in any of the protected classes. Affirmatively furthering fair housing throughout the City of Oak Ridge may be grouped into four goals set at a federal level:

1. Reducing segregation, and building on racial, geographic and economic diversity.
2. Eliminating racially and ethnically concentrated areas of poverty.
3. Reducing disparities in access to community assets such as quality schools, jobs, and transit.
4. Narrowing gaps that leave families with children, people with disabilities, and people of different races, colors and national origins with more severe housing problems (disproportionate housing needs).

Under the Fair Housing Act, a person may file a complaint, no later than one year after an alleged discriminatory housing practice has occurred, directly with the U.S. Department of Housing and Urban Development (HUD) at <https://www5.hud.gov/Hud903/main/pagHUD903Form.jsp>, or with a state or local agency enforcing laws that are “substantially equivalent” to the Fair Housing Act. Within the City of Oak Ridge, a citizen may file a complaint with the Codes Enforcement Division of the City’s Community Development Department. Upon the filing of such a complaint, the City’s Board of Building and Housing Code Appeals will hear the complaint and City staff investigates to determine if there is cause for a formal discrimination violation and proceed with recommending ways of eliminating any present activities of discrimination. HUD has the responsibility to serve notice of the complaint and conduct an investigation into the alleged discriminatory housing practice. The

² Under the Fair Housing Act, a person with a disability has a physical or mental impairment that substantially limits one or more major life activities; has a record of such impairment; or is regarded as having such impairment. This does not include current, illegal use of, or addiction to, a controlled substance.

³ The protected class of “familial status” protects households with children under age 18. These protections also apply to any person who is or plans to become pregnant. Note, familial status is defined in terms of the presence or expected presence of children, and does not include marital status or sexual orientation.

Fair Housing Act also enables aggrieved parties to pursue redress through the courts, without limit on the recovery of damages and attorney's fees.

Authors: Oak Ridge Community Development Department with assistance from Ridge to Valley Consulting

Funding of Analysis: This AI was funded through the General Fund of the City of Oak Ridge.

Background

The City of Oak Ridge adopted a Fair Housing Ordinance on April 21, 1969, which at the time, was one of the first of its kind in the State of Tennessee. The City of Oak Ridge continues to be committed to working with the public, private, and nonprofit partners in the community to ensure fair housing choice for all residents. Several AI's have been completed for the City of Oak Ridge including one in June 1994 and the most recent update in March 2011. The 1994 document utilized housing data from the 1990 U.S. Census and due to Oak Ridge's relatively slow rate of growth the housing data reported in the 2000 Census, reflected in the 2011 AI did not change significantly. Oak Ridge's rate of growth is still considered slow, but its demographics are shifting and this AI reflects that shift with information and data from both the 2010 Census and the 2009-2013 American Communities Survey.

III. Methodology

The City's Community Development Department staff reviewed baseline information from the 2011 AI study, as well as a number of other quantitative and qualitative sources. Demographic and descriptive data was obtained through the U.S. Census Bureau. Housing market analysis and trends in real estate over the past two years as well as other locally-generated reports and relevant data pertaining to the City's housing market, patterns, and local economy were evaluated. Municipal policies, procedures, and practices of the City of Oak Ridge's Building Codes and Zoning Ordinance along with the 2014 Consolidated Plan were reviewed. To review the City of Oak Ridge's compliance with all fair housing requirements, alignment with actions recommended in the City of Oak Ridge's 2011 AI study were evaluated, as well as compliance with the Fair Housing Act and fair housing regulations at 24CFR Parts 100 through 125.

To analyze mortgage lending trends, data was obtained from the Consumer Financial Protection Bureau through the Home Mortgage Disclosure Act (HMDA). Enacted by Congress in 1975 and implemented by the Federal Reserve Board's Regulation C who transferred rule-writing authority to the Consumer Financial Protection Bureau (CFPB) on July 21, 2011, HMDA requires lending institutions to report all public loan data⁴. Using the loan data submitted by many financial institutions, the Federal Financial Institutions Examination Council (FFIEC) creates aggregate and disclosure reports for each metropolitan area (MA) or County U.S. Census tract that are available to the public at central data depositories located in each MA. The following Anderson and Roane Counties, Tennessee 2010 Census Tract data were reviewed:

Anderson County

| | |
|--------|-----|
| 201 | 204 |
| 202.01 | 205 |
| 202.02 | 206 |
| 203 | |

Roane County

| |
|-----|
| 301 |
|-----|

⁴ <http://www.ffiec.gov/hmda/>

City staff also asked for and collected information from various local and regional stakeholders. Representatives of the following agencies and organizations provided information and input used in the development of this report:

- Aid to Distressed Families of Tennessee (ADFAC)
- East Tennessee Human Resource Agency (ETHRA)
- Emory Valley Center
- Habitat for Humanity
- Lafollette Housing Authority
- Legal Aid Society
- Oak Ridge Housing Authority
- Tennessee Housing Development Agency
- Tennessee Human Rights Commission
- Tennessee Valley Coalition for the Homeless
- Oak Ridge's Trinity Out-Reach Center of Hope (TORCH)

Summary of Organization Comments:

During conversations with representatives from the organizations listed above, several issues and as well as positive trends were discussed. As mentioned in previous AI documents, representatives from several organizations commented that limited transportation options cause a significant impediment to fair housing choice. Transportation options impact one's fair housing choice, as lower income families need to be close to work and are unlikely to use a taxi service due to the expense. Fixed route public transit options are currently not available in Oak Ridge.

Organizations consulted indicated that there are a limited number of quality housing options for very low income people, stating that the housing options that are affordable, exhibit poor living conditions (no heat, lack of proper insulation, etc.). Many organizations believe that landlords do not maintain their properties. Many of the people, who find themselves in unlivable housing situations, are not aware of fair housing laws or are afraid to file a complaint because they are unable to afford rent elsewhere or cannot pay to switch their utility deposits to a different location.

Organizations mentioned that the majority of affordable housing options in the City are homes that were built as temporary housing in the 1940s. Although structurally sound, this housing stock needs to be updated and maintained due to decades of owners not maintaining the properties. It was stressed that the amount of money it would take to upgrade and make these homes accessible and energy efficient is substantial.

One organization stressed the need for transitional housing within Oak Ridge. Currently, there is no place for any individual or family to go after one night if they find themselves in an emergency or crisis situation and they have no place to reside. The Oak Ridge community currently relies on the kindheartedness of its citizens to help people who find themselves in these crisis situations.

Another consideration raised was that landlords are generally not open to being accommodating for individuals that have either mental or physical disabilities. Finding accessible living conditions on rental properties is difficult within the City and if an individual has a mental illness, landlords are quick to assume that their behavior is not acceptable to neighboring tenants.

However, despite the concerns raised, many organizations are actively working with their clients and the community to promote increased awareness of fair housing laws and are encouraged that the City has begun its rental registration program.

Section IV. Demographic & Economic Profile

The following chart provides an overview of Oak Ridge's demographic and housing profile from both the 2000, 2010 Census, as well as the 2013 American Community Survey estimates. The City's population total is estimated to have increased over these years by 9.3%; however, the total number of households throughout the City has decreased. By estimates, Oak Ridge has been experiencing a slight rise in the average number of persons per household (both owned and rented) from 2.24 in 2000 to an estimated 2.39 persons in 2013. This is only minimally higher than Anderson County's household average size of 2.4 persons and Roane County's household average size of 2.38 persons.

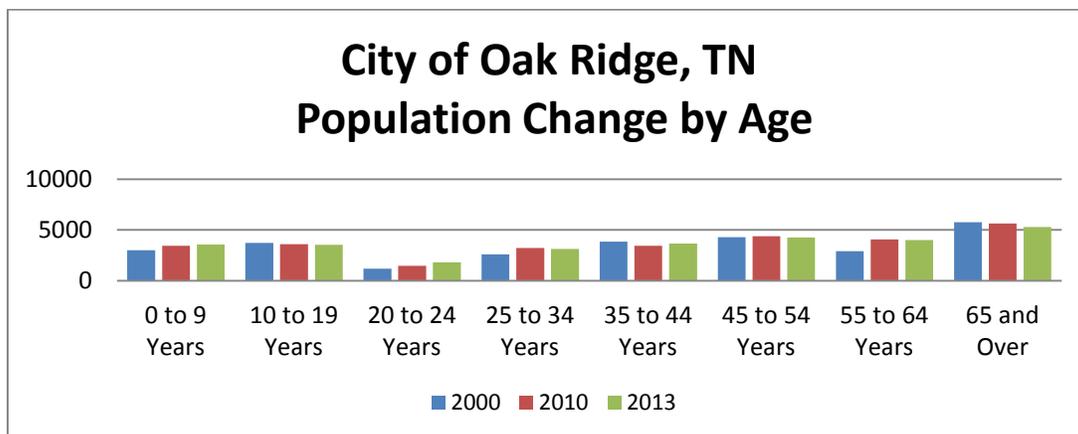
In the past, Oak Ridge has held a rising aged population with a median age of 43.4 in 2000, until the current ACS estimates for 2013 show that Oak Ridge's current median age is younger; around 41.3 years. The number of households with persons 65 years and over has decreased in recent years from over 20% of households in 2000, to an estimated 18.2% in 2013.

| City Demographic & Housing Profile 2000-2013 | | | |
|--|--------|--------|-----------------------------|
| Year | 2000 | 2010 | 2009-2013 (5-year estimate) |
| Population | 27,387 | 29,330 | 29,419 |
| Percent 65 or Older | 21.1% | 19.3% | 18.2% |
| Households | 12,602 | 12,772 | 12,415 |
| Avg. Household Size | 2.24 | 2.26 | 2.39 |
| Housing Units | 13,417 | 14,494 | 14,291 |
| Percent of Vacant Units | 10.1% | 11.9% | 13.1% |
| Owner Occupied Units | 68.4% | 64.4% | 53.5% |

Source: Census 2000, 2010, and the 2013 ACS estimates found at: http://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml

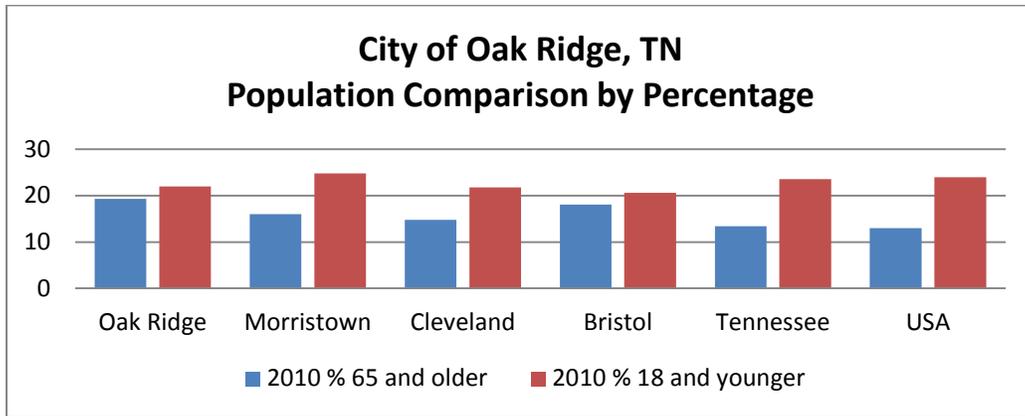
Population by Age

The chart below provides an overview of Oak Ridge's population's change by age. Between 2000 and 2013, there has been an increase in young adults between the ages of 20 to 24 years old, with a steady decrease in the amount of people aged 65 and older.



Source: Census 2000, 2010, and the 2013 ACS estimates found at: http://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml

The next chart compares Oak Ridge's population aged 65 and older, along with the population aged 18 and younger alongside other similarly sized CDBG Entitlement communities in Tennessee. Oak Ridge has the highest percentage (18.2%) of the population 65 years and over, but also holds an average percentage of youth, at around 22%. Bristol holds has the second highest 65 and older population at 18.1%, but has the smallest amount of youth in the comparison at 20.6%. Morristown, with 16% of their population over 65 years of age, holds the largest percentage of youth at almost 25% (24.8%).

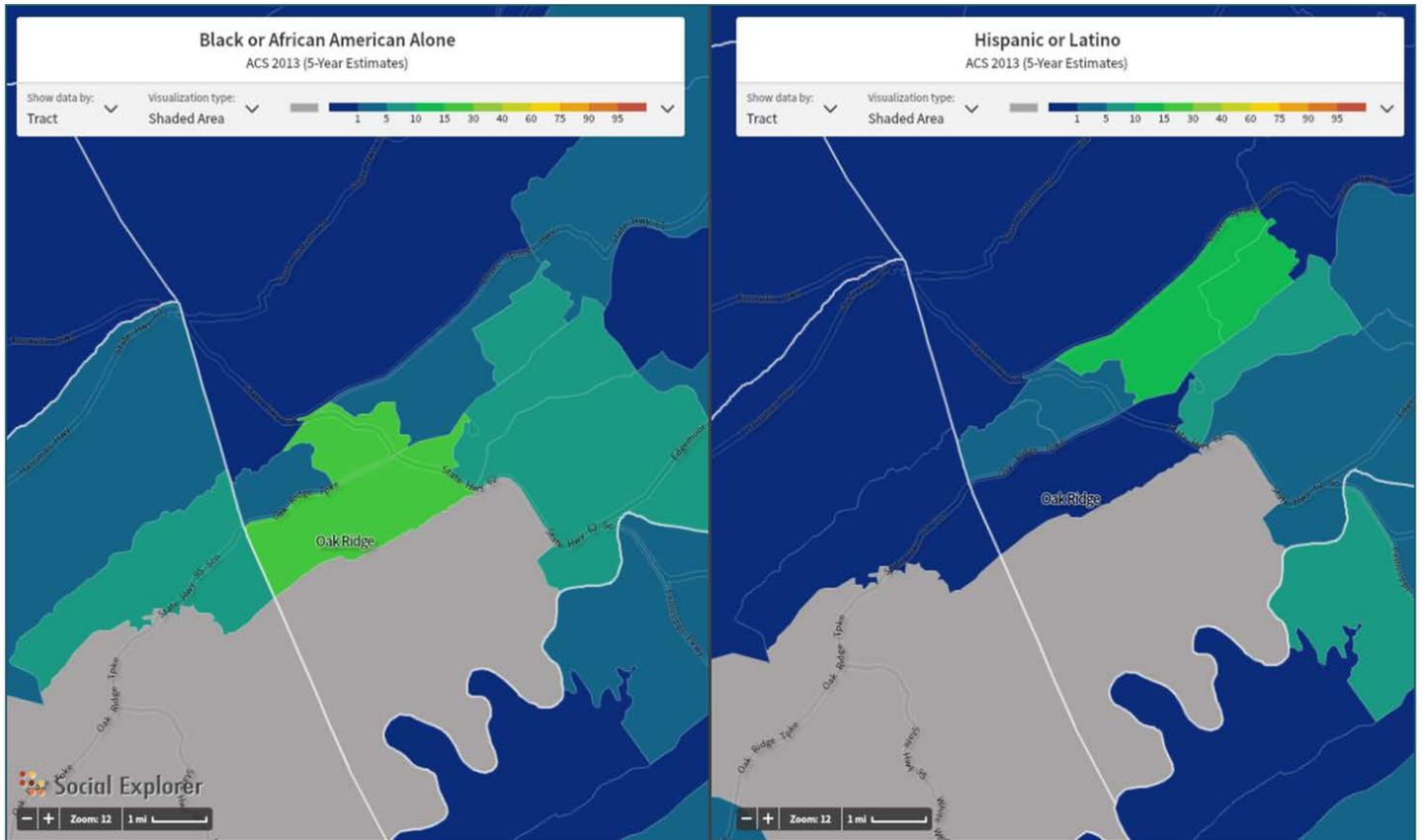


Source: Census 2000, 2010, and the 2013 ACS estimates found at: http://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml

Population by Race/Ethnicity

In 2010, Oak Ridge's population identified itself as 83.9% White, 8.1% Black or African-American, 0.4% American Indian/Alaska Native, 2.5% Asian, 0% Native Hawaiian and Pacific Islander, 2.0% some other race, and 3.0% two or more races. The Hispanic or Latino population comprised 4.6% of the City's total population.

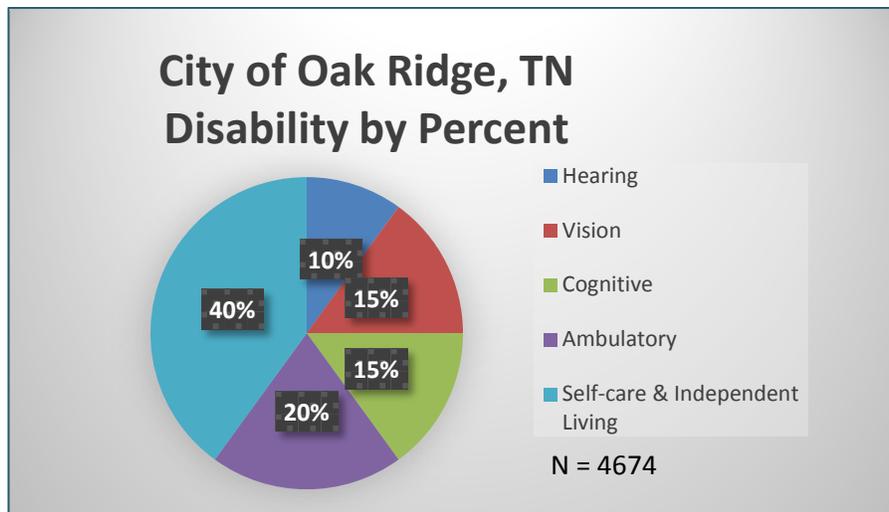
The side maps, on the following page, illustrate the distribution of the City's Black or African-American population and the Hispanic or Latino population. Comprising almost 10% of the total population, Black or African American individuals and families live throughout the City, but a larger percentage of those individuals and families live within the western/central areas of the city as shown below in the left portion of the map below in a shade of green. The Hispanic or Latino population also lives throughout the City, but a larger percentage of these individuals and families live north and east of the City's center, also shown in a shade of green. The areas of grey that you see in the maps below indicate that there is no population data for that area of the City.



Source: Oxford University Press, www.socialexplorer.com

Population by Disability Status

Currently, over 4600 individuals throughout the City of Oak Ridge have a disability and almost 18% are employed with a median income in 2013 of approximately \$30,360.



Source: 2013 ACS estimates found at: http://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml

Households

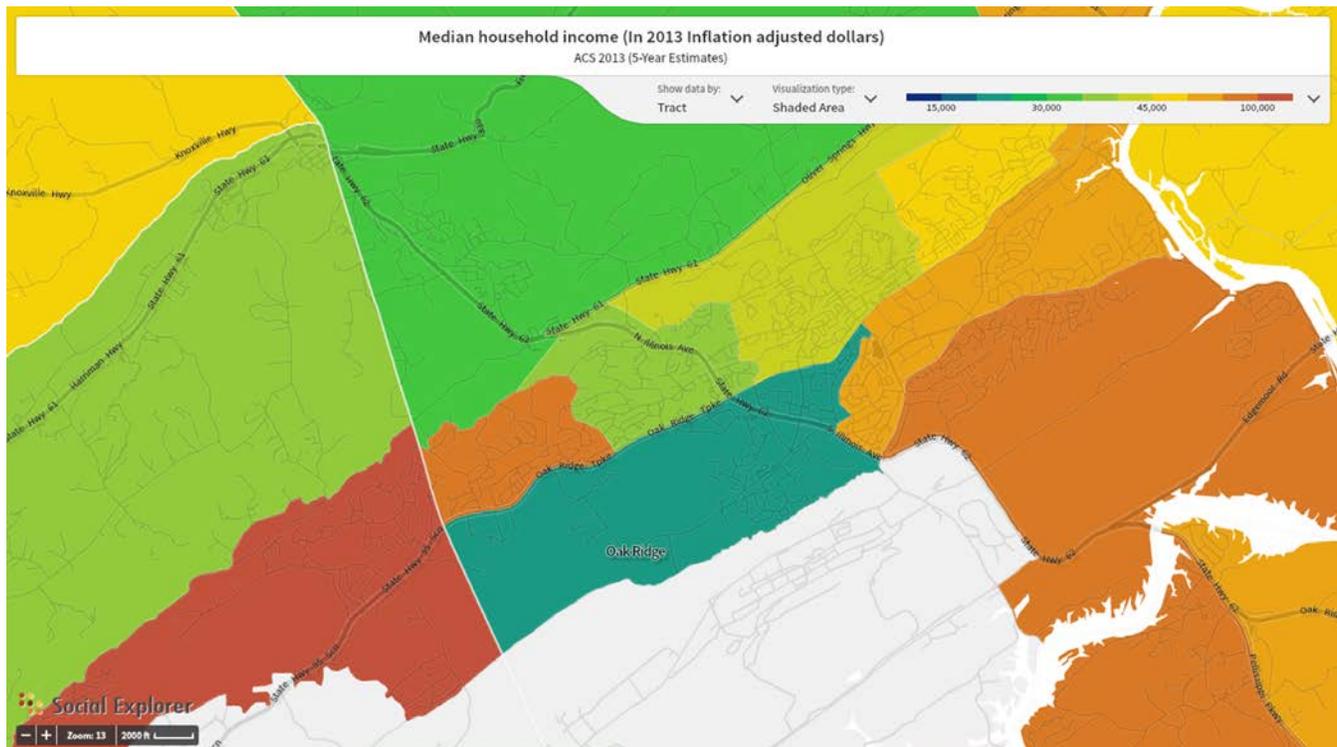
Households throughout Oak Ridge are predominately comprised of families. Over 30% of households accommodate individuals who are over the age of 65, and almost 10% of all households in the City are headed by a single parent with children under the age of 18.

| Households by Type, 2013 ACS (5-year estimate) | | |
|--|--------|---------|
| Household Type | Number | % Total |
| Total Households | 12,415 | 100 |
| Family Households | 7,641 | 61.4 |
| Non-Family Households | 4,796 | 38.6 |
| Individual(s) 65+ years | 3,944 | 31.8 |
| Male (alone) with related children under 18 | 292 | 2.4 |
| Female (alone) with related children under 18 | 923 | 7.4 |

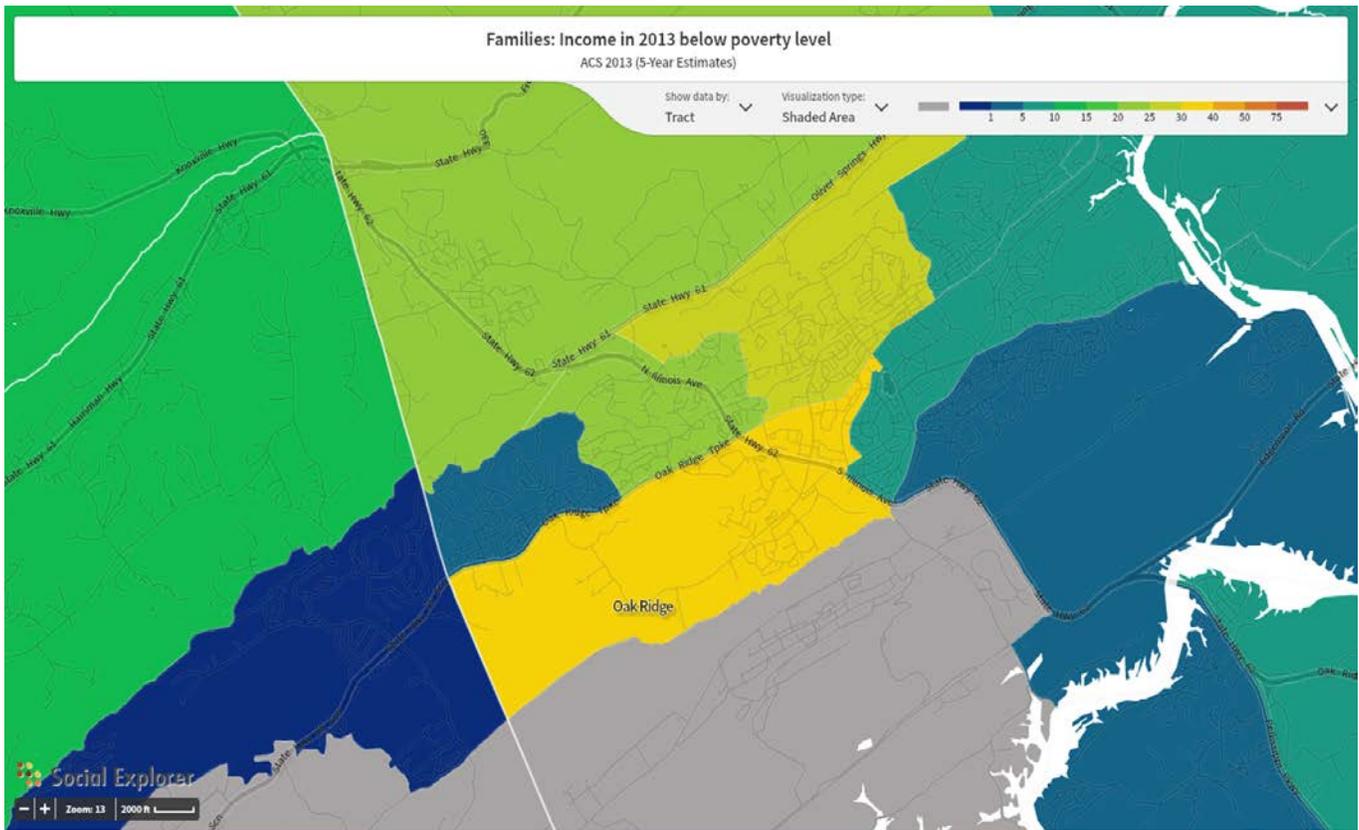
Source: U.S. Census Bureau, 2013, American FactFinder (census.gov)

Median Income & Poverty

Oak Ridge's estimated median household income between 2009 and 2013 was \$53,834.00, with a per capita income estimated at \$31,864. The median income for Oak Ridge is higher than the median household income of other similarly sized CDBG Entitlement communities of Bristol, Cleveland and Morristown (information shown in Housing Cost section), and also higher than the state's median household income of \$44,298. However, Oak Ridge's median income is comparable to the national median income of \$53,046. The map below displays the geographic economic stratification in Oak Ridge, comparing each census tract's household median income. Census Tract 201, shaded in a teal blue, holds the average lowest median household income of approximately \$24,798. The highest average median household income is located in Census Tract 301 (Roane County) with a median income of \$100,651, shaded below in red.



In the map below, Census tracts with the highest percentage of families in 2013 whose income was at or below the poverty level are shown. Tracts shaded yellow or light green represent 25% or more of families living at or below current poverty thresholds.



As of January 2015, U.S. poverty guidelines were updated by the Census Bureau and provided in the table below.

| 2015 POVERTY GUIDELINES FOR THE 48 CONTIGUOUS STATES AND DISTRICT OF COLUMBIA | |
|---|-------------------|
| Persons in family/household | Poverty guideline |
| 1 | \$11,770 |
| 2 | 15,930 |
| 3 | 20,090 |
| 4 | 24,250 |
| 5 | 28,410 |
| 6 | 32,570 |
| 7 | 36,730 |
| 8 | 40,890 |

For families/households with more than 8 persons, add \$4,160 for each additional person.

Source: <http://aspe.hhs.gov/poverty/15poverty.cfm>

Employment

Between 2009 and 2013, almost half (48.9%) of Oak Ridge residents were employed in the labor force. The American Community Survey estimates unemployment in Oak Ridge is around 8.5%, with the most current U.S. Bureau of Labor Statistics report in January of 2015 showing that the Knoxville region's unemployment rate rose almost a full percent from December 2014 to 6.5%.

The American Community Survey (2009-2013) provided information showing that most Oak Ridge residents are now employed in educational services, health care and social assistance fields, followed closely by professional, management, administrative and waste management services. The graph below provides a breakdown of Oak Ridge residents employed by reported industry types. Also interesting, it's reported that Oak Ridge residents spend an average of twenty minutes commuting to work.

| Employed Residents by Industry, 2009-2013 | |
|--|-------|
| Agriculture, forestry, fishing, hunting, mining | 30 |
| Construction | 817 |
| Manufacturing | 1,254 |
| Wholesale trade | 196 |
| Retail trade | 1,474 |
| Transportation, warehousing, utilities | 478 |
| Information | 211 |
| Finance, insurance, and real estate, rental, leasing | 582 |
| Professional, management, administrative & waste management services | 2,785 |
| Educational services, and health care, social assistance | 3,031 |
| Arts, entertainment, and recreation, accommodation, food services | 986 |
| Other services (except public administration) | 613 |
| Public Administration | 712 |

Source: U.S. Census Bureau, 2013, American Factfinder (census.gov)

Section V. Housing Profile

This section of the document profiles Oak Ridge's housing market by analyzing various types of data for information on the City's housing type, age, condition, tenure, vacancy and lending trends.

Oak Ridge's housing stock is comprised of 14,291 housing units at latest estimate. The City's 9,914 single-family detached housing units comprised 69.4% of the entire inventory of housing units. The following table shows the inventory of all housing units in the City.

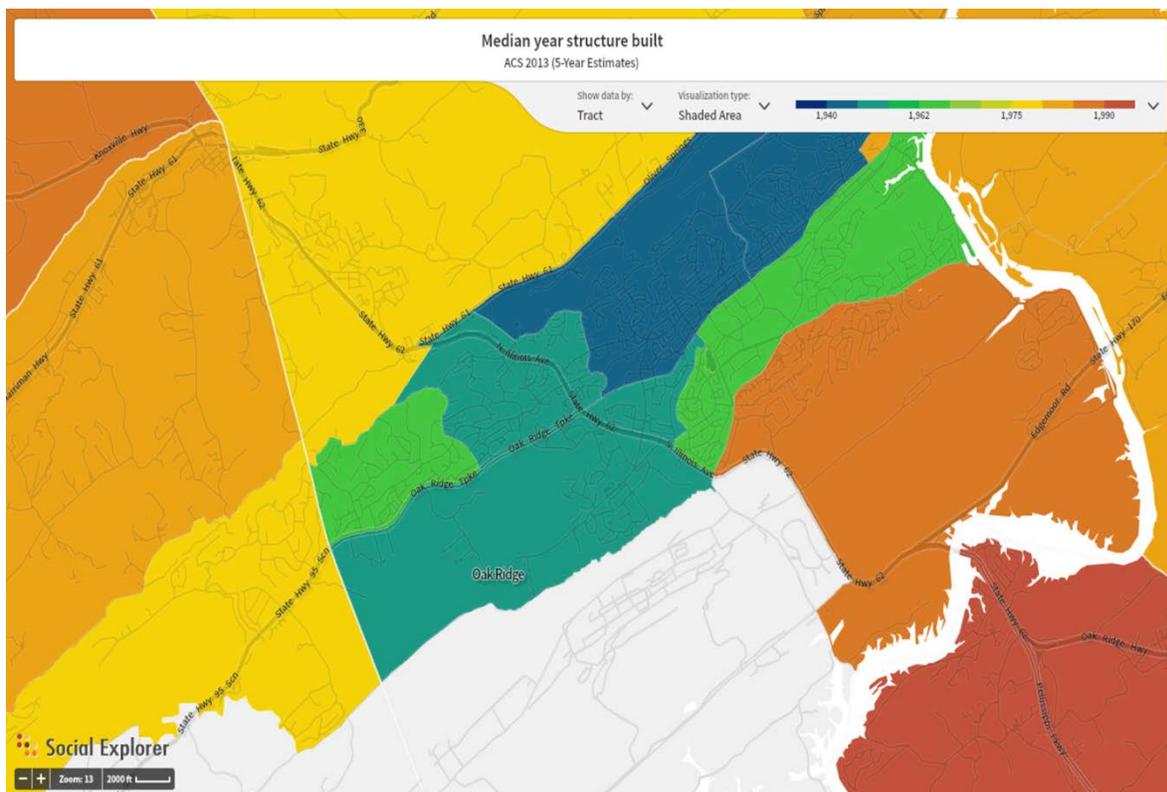
| Housing by Type, 2013 (ACS 5-Year estimate) | | |
|---|--------|---------|
| Type | Number | Percent |
| Boat, RV, van, etc. | 0 | 0 |
| Mobile home | 68 | 0.5 |
| 20 or more units | 978 | 6.8 |
| 10 to 19 units | 862 | 6.0.2 |
| 5 to 9 units | 524 | 3.7 |
| 3 or 4 units | 718 | 5.0 |
| 2 units | 786 | 5.5 |
| 1 unit, attached | 441 | 3.1 |
| 1 unit, detached | 9,914 | 69.4 |

Source: U.S. Census Bureau, 2013, American FactFinder (census.gov)

Age and Condition

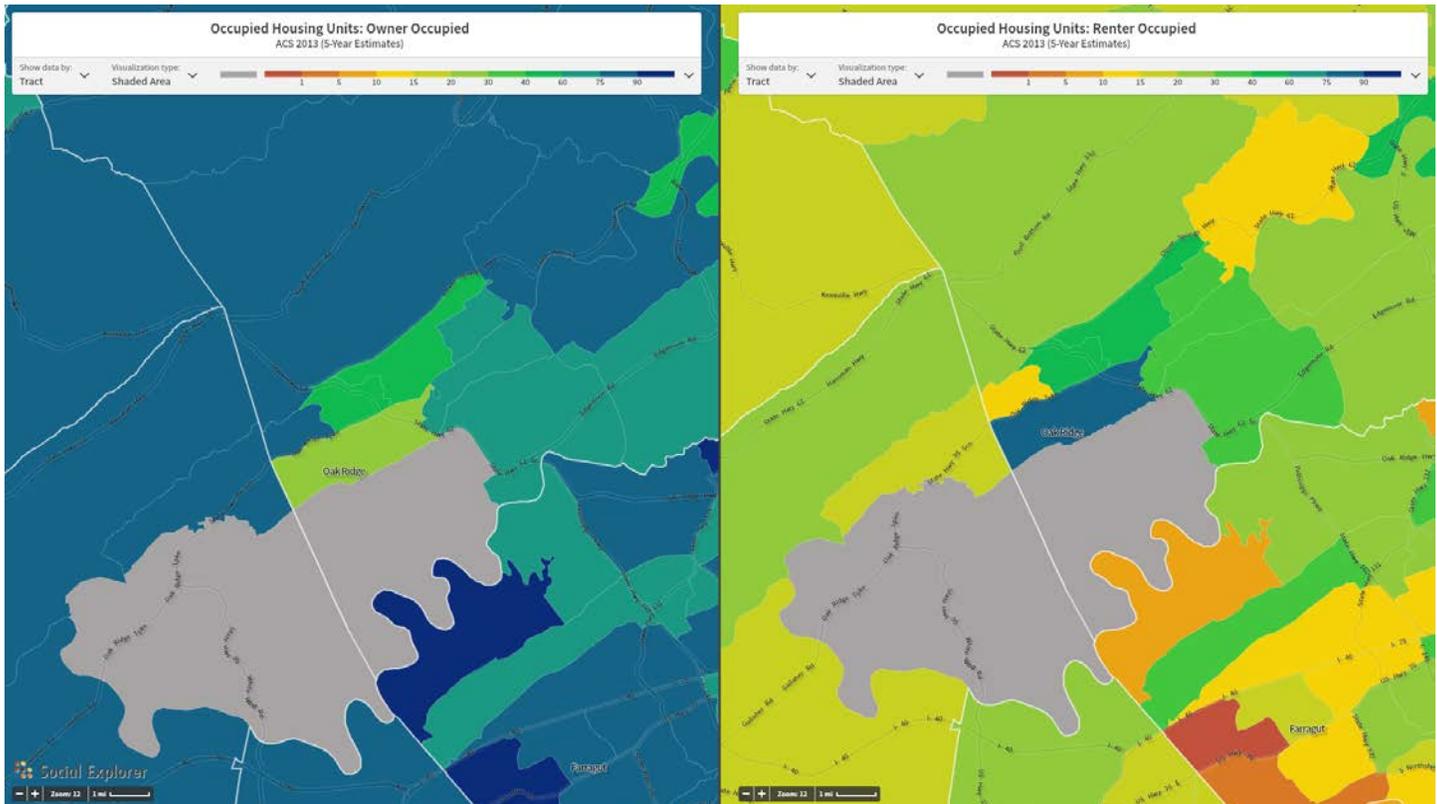
Over half of the total housing stock in Oak Ridge was built before 1960. With the exception of one census tract in the City where the homes were mostly built around 1988, the majority of all housing units in Oak Ridge were built before 1979. The age of the housing units throughout Oak Ridge presents many challenges for residents, including the potential for lead-based paint hazards and the need for significant financial investment in maintenance and updating (remodeling). The map below shows the median year a structure was built in each Census tract. This map displays that the median amount of structures built in Oak Ridge were built before 1990.

For low-income home owners, the necessary repairs to ensure safe and quality homes are frequently unaffordable, and deferred maintenance continues to deteriorate and depreciate houses throughout the City. Oftentimes, low-income rental housing cannot generate the revenue needed to make necessary improvements to structures without the owner having to raise the amount of rent charged, making it difficult for a low-income household to afford a place to live.



Tenure

The 2013 ACS estimated homeownership rate for Oak Ridge was 61.6%, which was lower than the Anderson County average of 68.5%, the state average of 67.8% and the nationwide rate of 65.2%. The map below shows the distribution of the 7,642 homeowners throughout City on the left side (largest percentage of homeownership for an area is shaded blue) along with the thirty-eight and a half percent of residents that currently rent their homes (largest percent of rented homes shaded in blue). As shown, the largest percentages of rental properties are located in the central portion of the City, with over 77% of the 1450 units renter occupied.



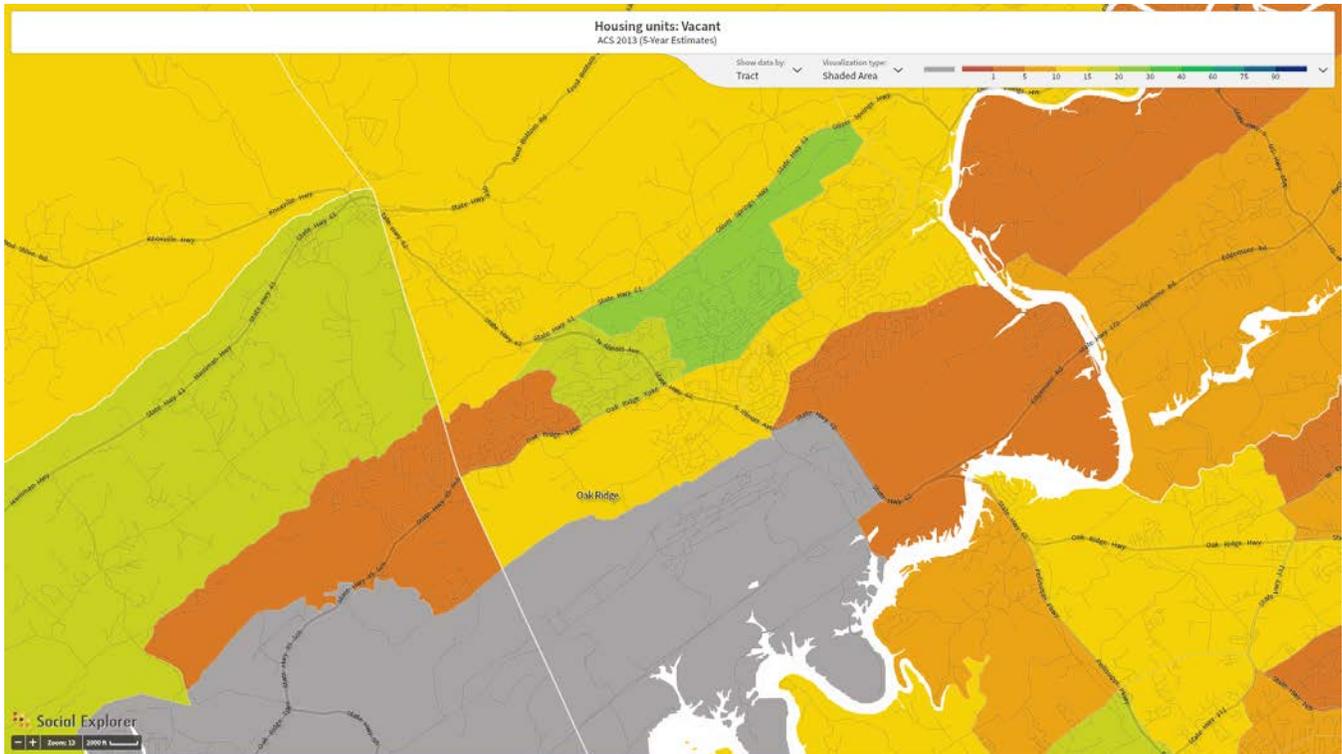
Source: Oxford University Press, www.socialexplorer.com

Vacant Units

The distribution of vacant properties throughout Oak Ridge indicates that the older a structure is within City limits, the more likely it is to be vacant. The Manhattan District Overlay (MDO) contains half of all the vacant homes in the city (seen in the map below shaded green). Properties throughout the United States are often vacant as a result of metropolitan-wide trends, such as sprawling development, consumer preference, job loss and demographic shifts. For the City of Oak Ridge, many historic structures are now vacant because their intended use as structures for temporary housing during the mid-1940s has ended. The modern, more transient housing market is not open to the amount of significant investment it would take to remodel these homes and ensure their marketability for individuals or families. Therefore, the City is left with several hundred historic structures that remain vacant because no substantial updating of the property has taken place, and their previous owner or occupant no longer resides there.

In terms of the amount of financial burden these vacant properties place on the City, the longer a property remains vacant or abandoned, the higher the cost of renovation or repurpose. The City still has a financial obligation to provide infrastructure like sewer and water to the properties regardless if they are vacant which places a financial burden on owner occupied residents throughout Oak

Ridge. Unfortunately, this trend has led to continued abandonment even after housing market conditions have somewhat improved.



Housing Costs

Households and families that pay more than 30 percent of their income for housing are considered cost burdened and could have difficulty being able to afford other necessities including food, clothing, transportation and medical care. The U.S. Department of Housing and Urban Development estimates that 12 million renter and homeowner households are now paying more than 50 percent of their annual income on their housing throughout the United States.

Currently, a household with one full-time worker earning the minimum wage cannot afford any local fair-market rent for a two bedroom apartment, including here in Oak Ridge. There are over 900 units in the City that exceed the 30 percent threshold, and 250 that exceed a 50 percent threshold, mostly concentrated in Anderson County's Census Tracts 204 and 205 (Highland View and West Village neighborhoods). However, as of the 2013 ACS, estimated monthly owner costs for housing throughout the City, on average, does not exceed 30 percent. Monthly owner costs are estimated from questions asked about the following:

- Mortgage
- Second mortgage and/or home equity loans
- Real estate taxes
- Homeowners insurance
- Any fees (condo, association, etc.)
- Mobile Home costs (if applicable)
- Utilities (electricity, gas, water, sewer and any other)

One way that housing can become more affordable for lower income, elderly and disabled households is through the U.S. Government's Housing Choice voucher program. This program

provides households the ability to afford decent, safe, and sanitary housing. Currently, 425 units throughout Oak Ridge participate in this program.

The table below helps to show similarities and differences between Oak Ridge and other CDBG Entitlement communities as well as neighboring counties, towns and cities in terms of housing values, rent and overall costs.

| Comparison of Housing Values, Rents and Owner Costs, 2013 | | | | | |
|---|-------------------------|----------------------|-------------------|--|---|
| Town/City/County | Median Household Income | Median Housing Value | Median Gross Rent | Median Monthly Owner Costs (with mortgage) | Median Monthly Owner Costs (w/out mortgage) |
| Oak Ridge | \$53,834.00 | \$148,400.00 | \$736.00 | \$1,302.00 | \$439.00 |
| Cleveland | \$35,239.00 | \$153,300.00 | \$685.00 | \$1,176.00 | \$384.00 |
| Morristown | \$33,217.00 | \$110,700.00 | \$633.00 | \$965.00 | \$351.00 |
| Bristol | \$35,621.00 | \$103,500.00 | \$600.00 | \$1,011.00 | \$350.00 |
| Anderson County | \$43,620.00 | \$127,000.00 | \$687.00 | \$1,129.00 | \$360.00 |
| Farragut | \$95,877.00 | \$317,100.00 | \$1,119.00 | \$1,933.00 | \$463.00 |
| Knoxville | \$33,595.00 | \$117,000.00 | \$734.00 | \$1,085.00 | \$367.00 |
| Knox County | \$47,694.00 | \$157,400.00 | \$769.00 | \$1,260.00 | \$368.00 |

Source: <http://www.census.gov/quickfacts>

VI. Mortgage Lending Trends

This section profiles the City's mortgage lending trends by reviewing data available through the Home Mortgage Disclosure Act (HMDA), maintained by the Federal Financial Institutions Examination Council (FFIEC). An overview of the number of mortgage loans issued and denied to individuals and households by race, gender and average income is provided.

In 2013, out of over 1500 loan applications that were submitted for properties throughout the City of Oak Ridge, approximately 800 loans were approved or originated. Eighty-five percent of those loans were granted to applicants who were identified on their applications as White, followed by 4.0% to applicants who were identified as Black or African American, 1.6% to applicants identified as Asian, 1.5% to applicants with Hispanic ethnicity, 0.3% or 2 loans to applicants who were identified as American Indian or Alaska Native and 0.3% or 2 loans to applicants who were identified as Native Hawaiian or other Pacific Islander. Around 5.0% of the approved applicants did not provide their race status on the loan application and 2.3% of approved applicants listed their race as Not Applicable.

| Oak Ridge Housing Loans by Race/Ethnicity, 2013 | |
|---|-------|
| American Indian or Alaska Native | 0.3% |
| Asian | 1.68% |
| Black or African American | 4.0% |
| Hispanic | 1.5% |
| Native Hawaiian or Other Pacific Islander | 0.3% |
| Race list as Not Applicable | 2.3% |
| Race Not Provided | 5.0% |
| Whites | 85% |

Source: <http://www.consumerfinance.gov/hmda/>

Within the available public data, 54.5% of home loans were granted to higher-income earners (\$65,000/year or more) and 41.3% were granted to middle-income earners in 2013 (between \$30,000 and \$62,999/year). Only 4.2% of the housing loans approved in 2013 were granted to lower-income earners (making at or below \$22,000 annually). Out of the 721 loan applications that provided annual income information, 608 applicants were approved for a loan on an owner-occupied property in the City that holds 1 to 4 families, with a median borrower income of approximately \$82,400/year and an approximate average loan amount of \$136,770.

From the table below, 41.0% of the housing loans in 2013 were granted to male and female co-borrowers, followed by 31.3% of loans to only male borrowers, 27.1% to only female borrowers, and 0.1% to borrowers who did not provide their gender or listed it as not applicable.

| Housing Loans by Gender, 2013 | |
|---|-------|
| Housing loans by male and female co-borrowers | 331 |
| Housing loans by female borrowers only | 179 |
| Housing loans by male borrowers only | 227 |
| Percent of owner-occupied housing loans to male and female co-borrowers | 41% |
| Percent of owner-occupied housing loans by female borrowers | 27.1% |
| Percent of owner-occupied housing loans to male borrowers | 31.3% |
| Percent owner-occupied housing loans by applicants who either did not provide gender information or listed gender as not applicable | 0.1% |

Source: <http://www.consumerfinance.gov/hmda/>

From available 2013 data, 259 applicants were denied by a financial institution for a housing loan to purchase property, make home improvements, or refinance their home in Oak Ridge. Another 257 applicants had their loan purchased by an institution. An additional 222 applicants were approved for a loan but decided to withdraw their application, did not accept the loan, or their application was closed due to it being incomplete. The majority of denials were due to credit history, followed by debt to income ratio.

| Loan* Denials, 2013, n=259 | |
|--|-------|
| Race: Asian Applicants | 1.2% |
| Race: Black or African American Applicants | 12.4% |
| Ethnicity: Hispanic Applicants | 1.2% |
| Race: White Applicants | 73.4% |
| Gender: Female only applicant | 24.3% |
| Gender: Male only applicant | 34% |
| Gender: Male/Female co applicant | 32.4% |
| Income: Above \$65,000/year | 33% |
| Income: At or below \$22,000/year | 14% |
| Income: Between \$30,000 and \$64,999/year | 49% |

*Loan types consist of conventional, FHA-insured and VA guaranteed

Loans in Oak Ridge are typically purchased by the various institutions listed in the chart below.

| Loan Purchasers for Oak Ridge , 2013 n=798 | |
|--|-------|
| Fannie Mae | 23.1% |
| Freddie Mac | 7.6% |
| Ginnie Mae | 10.0% |
| Commercial Bank(s) | 13.0% |
| Life insurance company, credit union, mortgage bank or finance company | 9.3% |
| Other (Private or Affiliate Institution) | 6.3% |
| Loan was not originated or was not sold in 2013 | 30.7% |

VII. Impediments to Fair Housing

The following impediments were identified:

Impediment #1: Lack of awareness and education about Fair Housing laws and the process for discrimination complaints

Tenants are often uninformed or confused about discrimination and fair housing laws.

Recommended Actions:

- Display information about fair housing laws permanently on the City of Oak Ridge website
- Encourage managers of multi-family housing and landlords to distribute fair housing information
- Use existing points of contact (i.e., Realtors Association, Chamber of Commerce) to distribute Fair Housing information
- Encourage Oak Ridge Public Schools to continue to work with partners in educating children about fair housing through creative activities
- Continue declaring April as Fair Housing month and participate in regional fair housing conference provided by the Equality Coalition for Housing Opportunities (ECHO)
- Establish a housing marketing plan for the City's housing programs to help increase awareness among protected classes, including the use of ethnic and local news/media sources (TV/radio);
- Continue an active Board of Building and Housing Code Appeals whereby charges of housing discrimination may be addressed
- Certification by the Mayor that the City of Oak Ridge affirmatively furthers fair housing.

Impediment #2: Limited number of quality housing options for very low income families

There are limited suitable housing options for very low income families.

Recommended Actions:

- Continue to fund quality affordable housing projects using CDBG funds, and leverage those funds and potentially other government funds, to increase the variety and affordability of housing that is suitable for different types of households;

Impediment #3: Accessibility issues for people with physical disabilities

Much of the available housing in Oak Ridge has yet to be updated with accommodations for the disabled.

Recommended Actions:

- Ensure that accessibility standards are being adhered to in new developments and encourage landlords and homeowners to work with the City in finding programs and opportunities to remodel existing developments to incorporate accessibility

Impediment #4: No transitional housing is available for individuals and families who are in emergency or crisis situations

There is no emergency shelter in Oak Ridge or Anderson County.

Recommended Actions:

- Assist in building partnerships to help gain funding to support a transitional housing program/facility for individuals and families;

Impediment #5: No fixed public transportation options for citizens to access resources

If residents need to travel to a location for a resource (work, school, grocery store), they have no way to get there if they do not own or have access to a privately owned vehicle.

Recommended Actions:

- Assist in finding innovative approaches to address public transportation needs and promote current public transportation options for citizens who need access to transportation.

VIII. Current Fair Housing Legal Status

Oak Ridge residents who feel they have experienced discrimination can submit their complaints to the City through the Code Enforcement office. There is a Board of Building and Housing Code Appeals form attached to the end of this document that any person with a housing discrimination complaint can fill out and return to the City.

The Legal Aid Society is also a source for information in Oak Ridge in regards to handling fair housing complaints. Legal Aid provides free legal advice to people with low income and the Oak Ridge office may be able to assist clients with the following housing-related issues:

- Getting into public or Section 8 housing
- Being evicted from public or Section 8 housing
- Foreclosures and other home owner problems
- Renter problems, such as: landlord locking renter out, or cutting off lights, gas or water
- Unfair loans that lead homeowners into foreclosure
- Home owner counseling

There has been one formal fair housing complaint filed in Oak Ridge since 2012, however, this may be due to a lack of public awareness of fair housing laws. A representative from the Oak Ridge Legal Aid office stated that most of the fair housing complaints are discovered while discussing other issues. The most common complaint that is heard is a failure to accommodate people with disabilities, both emotional and physical. People with disabilities have been denied housing of his or her choice because of lack of accessibility and/or necessary design standards. This is typically due to unwillingness by landlords to make appropriate accommodations.

IX. Fair Housing Strategy:

Recommended strategy for dealing with impediments:

1. The City government should continue to support fair housing by proclaiming, "April is Fair Housing Month," by formal City Council action and by input to the media. Participate in local fair housing events each April.
2. The City should continue to appoint members to the Board of Building and Housing Code Appeals whereby charges of housing discrimination may be addressed.

3. The City should continue to address the issue of emergency housing in a fair manner through its social service programs, implementation of its relocation policy and through referrals to private, state and federal programs.
4. The City's housing-related staff should seek out partnerships for fair housing training.
5. The City should distribute fair housing information and encourage schools to educate children about fair housing choice.
6. The City should make fair housing information easily accessible on the City's website (in other languages as well, such as Spanish, etc.) and establish a housing marketing plan for the City's housing programs to help increase awareness among protected classes, including the use of ethnic and local news/media sources (TV/radio/utility bills);
7. The City should support housing accessibility improvements.
8. The City should assist in helping secure appropriate funding for transitional and emergency housing.
9. The City should assist in finding additional ways (work with ETHRA and other social service agencies) to help residents travel to and from necessary resources.

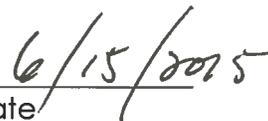
X. Certification

I, Mayor Warren Gooch, certify that the City of Oak Ridge, Tennessee will affirmatively further fair housing and that:

- This Analysis of Impediments to Fair Housing Choice was conducted by the City of Oak Ridge, Tennessee, in 2015, and this document is an accurate representation of the analysis process;
- The City of Oak Ridge will take appropriate actions as identified in this analysis; and
- The City of Oak Ridge will maintain records of this Analysis and the actions taken to overcome the impediments to fair housing choice.



Warren Gooch, Mayor of Oak Ridge, Tennessee



Date