

2014 STATE OF MISSISSIPPI ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE



FINAL REPORT

OCTOBER 29, 2014

2014 STATE OF MISSISSIPPI ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE



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Final Report
October 29, 2014

HAS YOUR RIGHT(S) TO FAIR HOUSING BEEN VIOLATED?

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Department of Housing and Urban Development
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EXECUTIVE SUMMARY

AI PURPOSE AND PROCESS

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

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

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

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

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

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

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

METHODOLOGY

As part of the consolidated planning process, and as a requirement for receiving HUD formula grant funding, the State of Mississippi is undertaking this AI to evaluate impediments to fair housing choice within non-entitlement areas of the State. Residents of the State of Mississippi are protected from discrimination in housing choice by the federal Fair Housing Act, which includes protections based on race, color, religion, national origin, sex, disability, and familial status².

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

² 42 U.S.C.A. §3601

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

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

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

Qualitative research included evaluation of relevant existing fair housing research and national and 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 2014 Mississippi Fair Housing Survey, monthly discussions with members of the Public Housing Authority Outreach Committee and the Planning and Development District (PDD) Outreach Committee. There are ten PDDs within Mississippi to help address the needs of communities, such as economic development, job training, social services, and transportation, which not are confined by political boundaries. Additionally there were four fair housing forums conducted in four cities in the State of Mississippi: Hattiesburg, Itta Bena, Jackson, and Tupelo, along with monthly discussions held with members of the MAPDD Outreach Committee and PHA Outreach Committee hosted via GoToWebinar, and six public review meetings held in Lexington, Canton, Clarksdale, Hollandale, Port Gibson, and Fayette.

Geographic analyses of racial and ethnic distribution were conducted by calculating race or ethnicity as the percentage of total population and then plotting the data on a geographic map of Census tracts in the State of Mississippi. 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 2012 were also used for select maps.

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

OVERVIEW OF FINDINGS

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

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

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

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

Socio-Economic Context

The population in non-entitlement areas of Mississippi grew by an estimated 6.8 percent between 2000 and 2013 and underwent several minor shifts during that time. In both the 2000 and 2010 Censuses, residents aged 35 to 54 years accounted for the largest share of the population; however, this share slipped by 0.9 percentage points over the decade and these residents represented 27.0 percent of the population in 2010. The two eldest cohorts, comprising residents between the ages of 55 and 64 and those aged 65 and older, grew more rapidly than the overall population between the Censuses. By 2010, these groups together accounted for a quarter of the population.

The racial composition of the state also changed, albeit slightly. White residents accounted for the largest share of residents in both years; though this share slipped by 1.8 percentage points between the two Censuses, white residents still accounted for 62.2 percent of all residents in 2010. By contrast, the Hispanic population more than doubled over the decade, though these residents still only accounted for 2.6 percent of the population in 2010.

Residents with disabilities accounted for 23.6 percent of the population in 2000. In that year, residents with disabilities were disproportionately concentrated in a large Census tract to the east of Jackson. By 2012, 16.5 percent of the population was observed to be living with disabilities, though due to changes in the ACS and Census questionnaires in 2008 it is impossible to conclude that the share of disabled residents actually declined.

The number of workers employed in non-entitlement areas of Mississippi has fluctuated considerably since 2000, when the number of employed persons peaked at over 1,072,000. The number of employed workers dropped by nearly 50,000 in 2009, though it began to increase steadily thereafter. Employment fell again in 2013, though because the size of the labor force contracted along with it, the unemployment rate continued to decline. As had been the case in the labor market, the unemployment rate fluctuated considerably after 2000. Rapid growth in the unemployment rate began in 2008 and continued through 2010, but began to fall after that year, and has continued to fall through 2013. The labor market decline of the late

2000s was also reflected in a drop in the number of full- and part-time jobs in the state, which continued through 2010.

In contrast to trends in the labor market, the amount that the average resident earned at his or her job grew steadily through the 1990s in real dollars. However, growth in earnings largely stopped after 2004 and held steady at around \$41,000 per year for approximately 6 years. However, in 2012 earnings ticked up to \$42,812. Growth in real per capita income has been even steadier over the same period, and has been almost uniformly positive since 1982, with the exception of a brief decline in 2009. Accordingly, household incomes rose between 2000 and 2012 as the share of households in all income groups below \$50,000 per year fell and the share of households in higher income groups rose. In spite of this shift in household incomes, the poverty rate rose by 2 percentage points between 2000 and 2012.

The composition of the housing stock in non-entitlement areas also shifted as growth in the number of housing units outpaced growth in the population. Though the number of occupied housing units increased by 8.5 percent these units declined as a share of the overall housing stock as the number of vacant units grew by 35.3 percent. There was a shift toward rental tenancy over the decade as the share of renter-occupied units grew over the share of owner-occupied units. Growth in the number of vacant units for rent accounted for a substantial portion of the increase in vacant units overall, along with the considerable growth in the number of “other vacant” units.

There was a marked shift away from medium sized households and toward larger and smaller households between 2000 and 2010. In addition, the shares of single-family units and apartments grew between 2000 and 2012, while the share of mobile homes and multiplexes fell. Fewer housing units were overcrowded by 2012, and fewer units had incomplete plumbing facilities. However, the share of units lacking complete kitchen facilities grew from 0.7 to 0.9 percent between 2000 and 2012.

Five-Year ACS estimates from 2012 indicate that tracts with relatively high median contract rent prices tended to be clustered around urban areas of the state; including Jackson and the coastal cities, as well as in the part of the Memphis, Tennessee suburbs that fell within the Mississippi border. Tracts with relatively high median home values tended to be concentrated in these same areas, as well as in Census tracts in and around Oxford and Starkville.

Fair Housing Law, Study, and Case Review

Mississippi residents are protected from discrimination in the housing market by the Federal Fair Housing Act, which recognizes race, color, national origin, religion, religion, sex, familial status, and disability as protected classes. In spite of these protections, national fair housing studies demonstrated the persistence of illegal discrimination in the housing market, though they also suggest that discrimination has become more subtle and difficult to identify.

The Department of Justice has lodged six complaints against housing providers in the State of Mississippi in the last five years. In three of these complaints, housing providers were alleged to have discriminated against Mississippi residents on the basis of familial status. Two complaints included allegations of discrimination on the basis of disability, and one complaint cited alleged racial discrimination.

Fair Housing Structure

Residents of non-entitlement areas of Mississippi who believe that they have been subjected to illegal discrimination in the housing market can lodge a complaint with the Department of Housing and Urban Development (HUD). HUD conducts complaint intake, investigation, and judges whether or not there is reasonable cause to believe that a fair housing complaint represents a genuine case of discrimination in the housing market. HUD may also resolve complaints found to be with cause through an administrative hearing, though many complainants elect to pursue their claims in a federal civil action. In such cases, HUD refers the complaint to the Department of Justice.

Since the beginning of 2014, the Mississippi Center for Justice has served residents of the State of Mississippi as a participant in HUD's FHIP program. The Center conducts complaint intake and processing for HUD in addition to a variety of services that it provides in furtherance of its commitment to advance racial and economic justice. Additionally, HEED (Housing Education and Economic Development), Mississippi Legal Services, and the Institute for Disability Studies at the University of Southern Mississippi may be contacted for guidance.

Fair Housing in the Private Sector

Private sector data that may suggest the presence of barriers to fair housing choice include data that detail patterns of lending and investment, fair housing complaints, and public perception of conditions in the housing market. Data collected through the Home Mortgage Disclosure Act (HMDA) show that 193,718 home purchase loans were originated in non-entitlement areas of Mississippi from 2004 through 2012, and 84,435 were denied, for an average denial rate of 30.4 percent. Black residents, Hispanic residents, and women were denied loans at a considerably higher rate than the average. For racial and ethnic minorities, these discrepancies held even when income was taken into account. Similarly, black and Hispanic borrowers were issued predatory style loans at a higher rate than white and non-Hispanic borrowers, as well as the overall average rate of 24.7 percent.

Analysis of data collected under the Community Reinvestment Act (CRA) provides for an overall portrait of the distribution of loans and loan dollars in non-entitlement areas of the state. Though such loans are intended to promote economic development in low- and medium-income areas, they were more frequently issued in Census tracts in which the median income was greater than 80.1 percent of the median family income of the counties in which those Census tracts were located. These Census tracts tended to be located in and around urban areas of the state; notably Jackson, Hattiesburg, Columbus, Tupelo, and Oxford. Rural Census tracts in the East Central and Delta regions tended to receive less in the way of loans and loan dollars.

A substantial number of Mississippi residents who lodged housing discrimination complaints with HUD alleged that housing providers had discriminated against them on the basis of race. Alleged discrimination on this basis was cited in 192 of the 329 complaints lodged with HUD between 2004 and 2014, followed by disability and sex, cited in 126 and 73 complaints, respectively. Familial status figured in 60 complaints lodged with HUD over the same period. The largest share of complainants cited "discrimination in terms, conditions, or privileges relating to rental", and "discriminatory refusal to rent" was also frequently cited.

Results from the Private Sector section of the 2014 Fair Housing Survey revealed that a majority of respondents typically were not aware of any barriers to fair housing choice in any of the industries or institutions mentioned, or did not know enough to weigh in on these questions. Perceived discrimination in rental housing was the most salient form of discrimination among survey respondents: more than a fifth of respondents claimed to be aware of housing discrimination in this area. In commentary submitted with the survey questions, perceived redlining on the part of housing providers and financiers was common. Many commenters also cited perceived discrimination on the bases of race, disability, and familial status.

Fair Housing in the Public Sector

Consideration of potential public sector barriers to fair housing choice included an analysis of the geographic distribution of subsidized, multifamily housing units as well as a discussion of local codes and policies and selected results from the 2014 State of Mississippi Fair Housing Survey. Survey questions included under this heading were designed to gauge the perceptions of stakeholders in non-entitlement areas of the state regarding potential barriers to fair housing in local policies, practices, and laws.

Geographic maps of multifamily assisted and Section 8 housing units administered through HUD and local Public Housing Authorities (PHAs) demonstrated that these units tended to be located in the north of the state, often clustered around major transportation corridors. Multifamily units funded through Low Income Housing Tax Credits tended to be located in areas with above average and disproportionate shares of poverty.

Analysis of public sector factors that have the potential to impact fair housing choice in the public sector included a survey of 41 land-use planners in non-entitlement areas of the state. The results of this survey suggest that local ordinances throughout non-entitlement areas of the state often lack provisions that may promote fair housing choice. For example, many jurisdictions lack provisions to promote development of affordable housing units or accessible construction.

Results from the 2014 Fair Housing Survey indicate a generally limited perception of barriers to fair housing choice in the public sector, though the perception that limited transportation networks represent a potential barrier to fair housing choice was relatively common. Commentary submitted with questions from the survey highlighted the perceived role of local policies in limiting the placement of affordable housing units.

Public Involvement

Efforts to promote and facilitate public involvement in the AI process included the 2014 Fair Housing Survey and Fair Housing Forums conducted in four cities in the State of Mississippi: Hattiesburg, Itta Bena, Jackson, and Tupelo, along with monthly discussions held with members of the MAPDD Outreach Committee and PHA Outreach Committee. As of July, 256 residents of non-entitlement areas of Mississippi have completed the survey. Their responses suggest that residents are general familiar with, and supportive of fair housing efforts. Discussions at fair housing forums were wide-ranging and varied with the location, though there were some themes in common between the forum discussions. Participants at more than one forum highlighted a need for increase outreach and education on fair housing law and

policy, as well as financial literacy, along with difficulties stemming from the lack of a state level fair housing law or policy and the prevalence of exclusionary zoning in local jurisdictions. In addition, a series of six public input meetings are scheduled for the middle of August, 2014. These meetings will be held in six different cities throughout the state.

IMPEDIMENTS TO FAIR HOUSING CHOICE AND SUGGESTED ACTIONS

Private Sector Impediments, Suggested Actions, and Measurable Objectives

Impediment 1: More frequent denial of home purchase loans to black, Hispanic, and female applicants: The perception that black, Hispanic, and female applicants found it more difficult to secure a home loan was cited by a number of survey respondents. This impression was shared by participants in fair housing forum discussion, and the perception was borne out in an analysis of home loan denials in non-entitlement areas of the state. Just over 30 percent of loan applications were denied to all applicants, but when those applicants were black the denial rate climbed to 45.2 percent. Hispanic applicants were denied 34.6 percent of the time, compared to a 28.4 percent denial rate for non-Hispanic applicants. Likewise, 36.1 percent of home loan applications from female applicants were denied, while 26.6 of applications from male applicants were denied.

Action 1.1: Educate buyers through credit counseling and home purchase training

Measurable Objective 1.1: Number of outreach and education activities conducted

Impediment 2: Predatory style lending falls more heavily on black borrowers: This impediment was identified in review of home loan data collected under the Home Mortgage Disclosure Act and in results of the 2014 Fair Housing Survey. Predatory style lending refers to loans with high annual percentage rates (HALs).³ While 24.7 percent of those who took out a home loan were issued a loan that was predatory in nature, the percentages of HALs to black and Hispanic borrowers were 38.7 and 27.3 percent, respectively.

Action 2.1: Educate buyers through credit counseling and home purchase training

Measurable Objective 2.1: Increase number of outreach and education activities conducted

Impediment 3: Discriminatory terms and conditions and refusal to rent: This impediment was identified through review of the results of the fair housing survey, the fair housing forum discussion in Hattiesburg, and fair housing studies profiled in the literature review. Perception of discriminatory refusal to rent was relatively common among survey respondents, who cited race as the basis for this perceived discrimination. In addition, discrimination was identified as more common in the rental industry during the fair housing forum in Hattiesburg, and national fair housing studies focus on the persistence of discrimination in the rental housing industry.

Action 3.1: Enhance testing and enforcement activities and document the outcomes of enforcement actions

Measurable Objective 3.1: Increase number of testing and enforcement activities conducted

³ See Section V for a more complete discussion of HALs.

Action 3.2: Continue to educate landlords and property management companies about fair housing law

Measurable Objective 3.2: Increase number of outreach and education activities conducted

Action 3.3: Continue to educate housing consumers in fair housing rights

Measurable Objective 3.3: Increase number of outreach and education activities conducted

Impediment 4: Failure to make reasonable accommodation or modification: Discrimination on the basis of disability was one of the most common complaints that HUD received from Mississippi from 2004 through the beginning of 2014, and the refusal on the part of housing providers to make a reasonable accommodation for residents with disabilities was a relatively common accusation. Fair housing forum discussions turned at points to the difficulties that persons with disabilities face in convincing landlords to allow reasonable modifications or in finding accessible apartments, as well as to the difficulties that those in construction and property management face in interpreting accessibility requirements. These concerns were also reflected in commentary submitted with the fair housing survey. Finally, two of the six DOJ complaints filed against Mississippi housing providers in the last five years alleged discrimination on the basis of disability.

Action 4.1: Enhance testing and enforcement activities and document the outcomes of enforcement actions

Measurable Objective 4.1: Increase number of testing and enforcement activities conducted

Action 4.2: Educate housing providers about requirements for reasonable accommodation or modification

Measurable Objective 4.2: Increase number of training sessions conducted

Action 4.3: Conduct audit testing on newly constructed residential units

Measurable Objective 4.3: Number of audit tests completed

Public Sector Impediments, Suggested Actions, and Measurable Objectives

Impediment 1: Insufficient understanding of fair housing laws: This impediment was identified through a review of the fair housing survey and the minutes taken at the four fair housing forums. Survey respondents and forum participants alike continually cited a need for more education of fair housing law and policies, as well as the types of actions that could constitute unlawful violations of the Fair Housing Act. In addition, results from the fair housing survey indicate some confusion among respondents on several matters relating to fair housing policy, including the extent of protections offered under the Fair Housing Act. Finally, nearly a quarter of fair housing survey respondents who reported their level of awareness of fair housing laws professed to know “very little” about such laws.

Action 1.1: Conduct outreach and education to the public for several perspectives related to fair housing

Measurable Objective 1.1: The number of outreach and education actions taken in regard to the value of having housing available to all income groups in the state, thereby encouraging neighborhoods to be more willing to accept assisted housing facilities

Measurable Objective 1.2: Participate in sponsorship or co-sponsorship of public meetings during April, Fair Housing Month

Measurable Objective 1.3: Request on a periodic basis fair housing complaint data from the Mississippi Center for Justice and HUD and publish this information to teach others about fair housing

Impediment 2: Insufficient fair housing testing and enforcement in non-entitlement areas of Mississippi: This impediment was identified in the results of the 2014 Fair Housing Survey. Of those who answered the survey question concerning awareness of fair housing testing, only about a fifth were aware of any such testing. Furthermore, a majority of respondents who registered their opinion on current levels of fair housing testing thought that they were insufficient.

Action 2.1: Initiate an inventory of Fair Housing Initiative Program (FHIP) grantees or prospective grantees in Mississippi

Measurable Objective 2.1: Compile the inventory

Measurable Objective 2.2: Conduct outreach and exploratory discussions with FHIP entities who might be able to perform testing and enforcement activities in the State

Action 2.2: Number of contacts made with FHIP entities

Impediment 3: Fair Housing Infrastructure largely lacking: This impediment was identified through review of the fair housing structure as well as the minutes from the Hattiesburg Fair Housing Forum. There is no state level agency that is charged with enforcing fair housing law in the state, just as there is no fair housing statute at the state level. The lack of such an agency, and the difficulties this presents for affirmatively furthering fair housing, were a dominant theme in the Hattiesburg Fair Housing Forum.

Action 3.1: Initiate an inventory of Fair Housing Initiative Program (FHIP) grantees or prospective grantees in Mississippi

Measurable Objective 3.1: Compile the inventory

Measurable Objective 3.2: Conduct outreach and exploratory discussions with FHIP entities who might be able to work in Mississippi

Action 3.2: Number of contacts made with FHIP entities

Impediment 4: Lack of understanding of the fair housing duties: Just as housing consumers are often unaware and uninformed of their rights under the Fair Housing Act, housing providers can be unaware of their responsibilities under the Act. This lack of awareness often manifests itself as an unwillingness to make reasonable accommodations for residents with disabilities, though it can appear in other actions and omissions on the part of housing providers. The presence of this impediment was identified through review of the minutes of the fair housing forum and the results of the fair housing survey.

Action 4.1: Promote the Analysis of Impediments and Fair Housing Action Plans during Fair Housing Month in April

Measurable Objective 4.1: Actions taken to promote fair housing month and the Analysis of Impediments to Fair Housing Choice

Action 4.2: Hold quarterly meetings to promote public understanding of fair housing, affirmatively furthering fair housing, and key issues in lending
Measurable Objective 4.1: Number of meetings held

Impediment 5: Overconcentration of vouchers, assisted housing, and lower-income housing in selected areas of the State. Geographic maps prepared that show the geographic dispersion of such housing is concentrated in selected non-entitlement areas of the State. Further analysis demonstrates that there is some correlation between locations of such housing and concentrations of poverty.

Action 5.1: Add additional criteria to assisted housing location and other investment decisions

Measurable Objective 5.1: Determine the additional criteria, such as concentration of poverty or concentration of racial or ethnic minority, and incorporate this in the decision process

Measurable Objective 5.2: Evaluate the implications of redevelopment and other investments in areas with high rates of poverty and/or higher concentrations of racial and ethnic minorities

Action 5.2: Facilitate the creation of certification classes for a small set of voucher holders so that they may qualify for enhanced value vouchers, a voucher that pays slightly higher than other vouchers

Measurable Objective 5.2: Facilitate education of prospective landlords about the qualities of certified holders of Housing Choice Voucher tenants

Action 5.3: Increase voucher use in moderate income neighborhoods

Measurable Objective 5.3: Facilitate education of prospective landlords about the qualities of Housing Choice Voucher

Action 5.4: In concert with Mississippi PHAs, open dialogue with HUD concerning elements of PHA operational and program requirements that may contribute to over-concentrations of assisted units in areas with high poverty rates and high concentrations of racial and ethnic minorities

Measurable Objective 5.4: Number of attempts to open dialogue, notes and recordings of meetings, recordings and notes about which changes can effect positive change to affirmatively further fair housing

FAIR HOUSING ACTION PLAN

The Community Services Division of the Mississippi Development Authority has developed a series of action steps that will be taken to address the impediments identified in the previous section. Though the MDA will take the lead in the implementation of these policies, it plans to do so through partnerships with statewide and local agencies that include Housing Education and Economic Development (HEED) and local Public Housing Agencies (PHA), as well as local and regional fair housing organizations. Action plan items pertaining to the private sector impediments are included in the first table, which begins on the following page. Actions designed to address public sector impediments are outlined in the second table, which begins on page 16.

Mississippi Development Authority

Community Services Division

2015-2018 FAIR HOUSING AND AFFIRMATIVELY FURTHERING FAIR HOUSING OUTREACH PLAN

Private Sector Impediments	Action Plan	Action Steps	Measurable Objective	Responsible Agency	Timeline
<p>1. More frequent denial of home purchase loans to Black, Hispanic, and Female Applicants</p> <p>Goal: Increase homeownership opportunities among minorities and lower income households</p>	<p>1.1. Educate buyer through credit counseling and home purchase training</p>	<p>MDA will ensure and monitor non-profit homebuyers grantees provide counseling and training to prospective homebuyers;</p> <p>MDA will continue to sponsor the HEED Fair housing and Fair Lending Conference annually; and seek to identify other fair housing organizations to provide additional fair housing educational services.</p> <p>MDA will conduct outreach to realtors, lenders and related associations and will seek to provide homebuyer training and workshops at various time frames throughout the calendar year and increase awareness during April – Fair Housing month;</p>	<p>1.1 Number of outreach and education activities conducted</p>	<p>MDA</p>	<p>All outreach activities will be conducted quarterly and/or bi-annually with an annual update of accomplishments</p> <p>Additional activities will be conducted as additional outreach opportunities become available.</p>

		<p>MDA will provide Fair Housing outreach by utilizing newspapers of general circulation and Minority owned newspapers, electronic and social media applications.</p> <p>MDA will ensure that Local Units of Government and other non-profit grantees conduct fair housing activities as part of their certification to affirmatively further fair housing and program requirements.</p>			
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Private Sector Impediments	Action Plan	Action Steps	Measurable Objective	Responsible Agency	Timeline
<p>2. Predatory style lending falls more heavily on black borrowers</p> <p>Goal: Implement and sponsor credit repair and homebuyer training to decrease the predatory practices and disparities in lending</p>	<p>2.1 Educate buyers through credit counseling and home purchase training</p>	<p>MDA will seek to provide homebuyer training and conduct workshops in partnership with non-profit housing organizations;</p> <p>MDA will conduct outreach to MS Banking Associations and lenders thru non-profit homebuyer grantees and MDA coordinated trainings;</p> <p>Provide Fair Housing outreach newspapers of general circulation and Minority owned newspapers and electronic and social media applications;</p>	<p>2.1 Increase number of outreach and education activities conducted</p>	<p>MDA</p>	<p>All outreach activities will be conducted quarterly and/or bi-annually with an annual update of accomplishments</p> <p>Additional activities will be conducted as additional outreach opportunities become available.</p>

Private Sector Impediments	Action Plan	Action Steps	Measurable Objective	Responsible Agency	Timeline
<p>3. Discriminatory terms and conditions and refusal to rent</p> <p>Goal: Implement and sponsor fair housing education and outreach trainings and conferences and research analysis to reduce housing discrimination</p>	<p>3.1 Enhance testing and enforcement activities and document the outcomes of enforcement actions</p> <p>3.2 Continue to educate landlords and property management companies about Fair Housing Laws</p> <p>3.3 Continue to educate housing consumers in Fair Housing rights</p>	<p>MDA will partner with a non-profit fair housing organizations to enhance testing and enforcement activities;</p> <p>MDA will provide landlord tenant education information to local units of government and provide education outreach information at schedule trainings and workshops;</p> <p>MDA will continue to sponsor the HEED Fair housing and Fair Lending Conference annually;</p> <p>MDA will seek to provide homebuyer training and workshops during April – Fair Housing month and at additional trainings;</p> <p>Provide Fair Housing outreach in newspapers of general circulation and Minority owned newspapers and electronic and social media applications;</p>	<p>3.1 Increase number of testing and enforcement activities conducted</p> <p>3.2 Increase number of outreach and educational activities conducted</p> <p>3.3 Increase number of outreach and educational activities conducted</p>	<p>MDA</p>	<p>All outreach activities will be conducted quarterly and/or bi-annually with an annual update of accomplishments</p> <p>Additional activities will be conducted as additional outreach opportunities become available.</p>

Private Sector Impediments	Action Plan	Action Steps	Measurable Objective	Responsible Agency	Timeline
<p>4. Failure to make reasonable accommodation or modification.</p> <p>Goal: Increase the availability of accessible, affordable housing throughout the State</p>	<p>4.1 Enhance testing and enforcement activities and document outcomes of enforcement activities</p> <p>4.2 Educate housing providers about requirements for reasonable accommodation or modification</p> <p>4.3 Conduct audit testing on newly constructed residential units</p>	<p>MDA will work thru non-profit grantees in educating contractors of reasonable accommodation requirements;</p> <p>MDA will seek to provide 1st accessible training to grantee and at various workshop across the state;</p> <p>MDA will work thru a non-profit or seek ways as an agency to effectively conduct audit testing on newly constructed residential units;</p>	<p>4.1 Increase number of testing and enforcement activities conducted</p> <p>4.2 Increase number of training sessions conducted</p> <p>4.3 Number of audit tests completed</p>	<p>MDA</p>	<p>All outreach activities will be conducted quarterly and/or bi-annually with an annual update of accomplishments</p> <p>Additional activities will be conducted as additional outreach opportunities become available.</p>

Mississippi Development Authority

Community Services Division

2015- 2018 FAIR HOUSING AND AFFIRMATIVELY FURTHERING FAIR HOUSING OUTREACH PLAN

Public Sector Impediments	Action Plan	Action Steps	Measurable Objective	Responsible Agency	Timeline
<p>1. Insufficient understanding of Fair Housing Laws.</p> <p>Goal: Increase and enhance fair housing outreach and education efforts throughout the State</p>	1.1 Conduct outreach and education to the public for several perspectives related to fair housing	<p>MDA will continue to sponsor the HEED Fair housing and Fair Lending Conference annually; and seek to identify other fair housing organizations to provide additional services</p> <p>MDA will conduct outreach to realtors, lenders and related associations as an agency</p> <p>MDA will seek conduct fair housing workshops and trainings at time frames throughout the calendar year and increase awareness during April – Fair Housing month;</p> <p>Provide Fair Housing outreach in newspapers of general circulation and Minority owned newspapers, electronic and social media applications.</p> <p>Ensure Local Units of Government and other non-profit grantees conduct fair housing activities as part of their certification to affirmatively further fair housing and program requirements.</p>	<p>1.1 Number of outreach and education activities conducted</p> <p>1.2 Sponsor and or Partner public meetings during Fair Housing Month (April)</p> <p>1.3 Request and publish fair housing complaint data.</p>	MDA	<p>All outreach activities will be conducted quarterly and/or bi-annually with an annual update of accomplishments.</p> <p>Additional activities will be conducted as additional outreach opportunities become available</p>

Public Sector Impediments	Action Plan	Action Steps	Measurable Objective	Responsible Agency	Timeline
<p>2. Insufficient Fair Housing testing and enforcement in non-entitlement areas.</p> <p>Goal: Provide testing and enforcement activities in communities where discrimination has been shown to be particularly high and to determine if discriminatory practices are occurring</p>	<p>2.1 Identify an inventory of Fair Housing initiative Program (FHIP) grantees</p> <p>2.2 Collaborate with identified FHIPs</p>	<p>MDA will seek to identify additional FHIPs and other non-profit agencies to partner with to conduct fair housing testing and enforcements</p> <p>Ensure Local Units of Government grantees conduct fair housing activities as part of their certification to affirmatively further fair housing and program requirements.</p>	<p>2.1 Compile the inventory</p> <p>2.2 Conduct outreach and exploratory discussions with FHIP to perform testing and enforcement</p>	MDA	<p>All outreach activities will be conducted quarterly and/or bi-annually with an annual update of accomplishments</p> <p>Additional activities will be conducted as additional outreach opportunities become available</p>
<p>3. Fair Housing Infrastructure largely lacking.</p> <p>Goal: Identify Fair Housing entities and resources to provide infrastructure</p>	<p>3.1 Enhance testing and enforcement activities and document the outcomes of enforcement actions</p> <p>3.2 Continue to educate landlords and property management companies about Fair Housing Laws</p> <p>3.3 Continue to educate housing consumers in Fair Housing right</p>	<p>MDA will seek to identify additional FHIPs and other non-profit agencies to partner with to conduct fair housing testing and enforcements;</p> <p>MDA will work to partner with non-profit agencies, PHA's and local units of government to identify private and public property management companies to conduct landlord tenant education and outreach training and workshops;</p> <p>MDA will ensure Local Units of Government grantees conduct fair housing activities as part of their certification to affirmatively further fair housing and program requirements.</p>	<p>3.1 Increase number of testing and enforcement activities conducted</p> <p>3.2 Increase number of outreach and educational activities conducted</p> <p>3.3 Increase number of outreach and educational activities conducted</p>	MDA	<p>All outreach activities will be conducted quarterly and/or bi-annually with an annual update of accomplishments</p> <p>Additional activities will be conducted as additional outreach opportunities become available</p>

Public Sector Impediments	Action Plan	Action Steps	Measurable Objective	Responsible Agency	Timeline
<p>4: Lack of understanding of fair housing duties.</p> <p>Goal: Provide and ensure grantees, landlords, housing providers, real estate agents, property managers, lenders, housing authority staff, and non-profit housing staff with fair housing education, responsibilities, and clearly defined roles</p>	<p>4.1 Promote the Analysis of Impediments and Fair Housing Action Plans during Fair Housing Month (April)</p> <p>4.2 Sponsor/Partner quarterly Fair Housing trainings/meetings</p>	<p>MDA will promote the AI at all workshops and meeting and seek to increase the awareness of the AI during April- Fair Housing Month;</p> <p>MDA will work with partners to provide quarterly and annually fair housing meetings and trainings;</p> <p>Ensure Local Units of Government and other non-profit grantees conduct fair housing activities as part of their certification to affirmatively further fair housing and program requirements;</p> <p>MDA will work to partner with non-profit agencies, PHA's and grantee to identify private and public property management companies to conduct landlord tenant education and outreach training and workshops;</p>	<p>4.1 Activities conducted to promote Fair Housing Month and AI</p> <p>4.2 Number of trainings/meetings held</p>	MDA	<p>All outreach activities will be conducted quarterly and/or bi-annually with an annual update of accomplishments</p> <p>Additional activities will be conducted as additional outreach opportunities become available</p>
<p>5: Overconcentration of vouchers, assisted housing, and lower-income housing in selected areas of the State</p> <p>Goal: Educate the public about the value of affordable housing</p>	<p>5.1 Add additional criteria to assisted housing locations and other investment decisions</p> <p>5.2 Create certification program/classes for</p>	<p>MDA will work to coordinate and facilitate outreach opportunities with PHA and HUD to discuss the action plan for these impediments.</p>	<p>5.1: Determine the additional criteria, such as concentration of poverty or concentration of racial or ethnic minority, and incorporate this in the decision process</p> <p>5.2 Evaluate the</p>	MDA will work as a facilitator in partnership with the PHA's to address this identified impediment.	<p>This will be an ongoing activity and schedule for the various organizations involved are determined.</p> <p>Additional activities will be conducted as additional outreach opportunities become</p>

<p>and the importance of strategies to increase diversity in the housing market.</p>	<p>select voucher holders that provide a slightly higher value</p> <p>5.3 Increase voucher use in moderate income neighborhoods</p> <p>5.4 Collaborate with PHAs regarding voucher program guidelines and requirements</p>		<p>implications of redevelopment and other investments in areas with high rates of poverty and/or higher concentrations of racial and ethnic minorities</p> <p>5.3 Facilitate education of prospective landlords about the qualities of certified holders of Housing Choice Voucher tenants</p> <p>5.4 Facilitate education of prospective landlords about the qualities of Housing Choice Voucher</p> <p>5.5 Number of attempts to open dialogue, notes and recordings of meetings, recordings and notes about which changes can effect positive change to affirmatively further fair housing</p>	<p>available</p>
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SECTION I. INTRODUCTION

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

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

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

WHY ASSESS FAIR HOUSING?

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

In 1994, HUD published a rule consolidating plans for housing and community development programs into a single planning process. This action grouped the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Solutions Grants (ESG)⁴, and Housing Opportunities for Persons with AIDS (HOPWA) programs into the Consolidated Plan for Housing and Community Development, which then created a single application cycle.

As a part of the consolidated planning process, states and entitlement communities that receive such funds as a formula allocation directly from HUD are required to submit to HUD certification that they are affirmatively furthering fair housing. In the State of Mississippi, the cities of Biloxi, Gulfport, Hattiesburg, Jackson, Moss Point, and Pascagoula must also certify that they are affirmatively furthering fair housing (AFFH). The Mississippi Development Authority (MDA) certifies for the remainder of the state, herein referred to as "non-entitlement areas". The AFFH certification process has three parts:

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

⁴In 1994, the Emergency Solutions Grants program was called the Emergency Shelters Grants program.

In the *Fair Housing Planning Guide*, page 2-8, HUD notes 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 availability of housing choices [and]
- Any actions, omissions, or decisions which have [this] effect.”⁵

State and local governments may enact fair housing laws that extend protection to other groups as well. However, no fair housing or general anti-discrimination provisions are included in Mississippi State Code.

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

PURPOSE OF THIS RESEARCH

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

- “Analyzing and working to eliminate housing discrimination in the jurisdiction;
- Promoting fair housing choice for all persons;
- 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.”⁶

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

LEAD AGENCY

The agency that led the effort of preparing this report on behalf of the State of Mississippi was the Mississippi Development Authority.

⁵ *Fair Housing Planning Guide*.

⁶ *Fair Housing Planning Guide*, p.1-3.

Commitment to Fair Housing

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

GEOGRAPHIC SCOPE OF THE ANALYSIS

This AI addresses the status of fair housing within non-entitlement areas of the State of Mississippi. As such, data from the entitlement cities of Biloxi, Gulf Port, Hattiesburg, Jackson, Moss Point and Pascagoula are excluded from this analysis. Map I.1, on the following page, displays the State of Mississippi along with the areas encompassed by the six entitlement jurisdictions, which are white on this map.

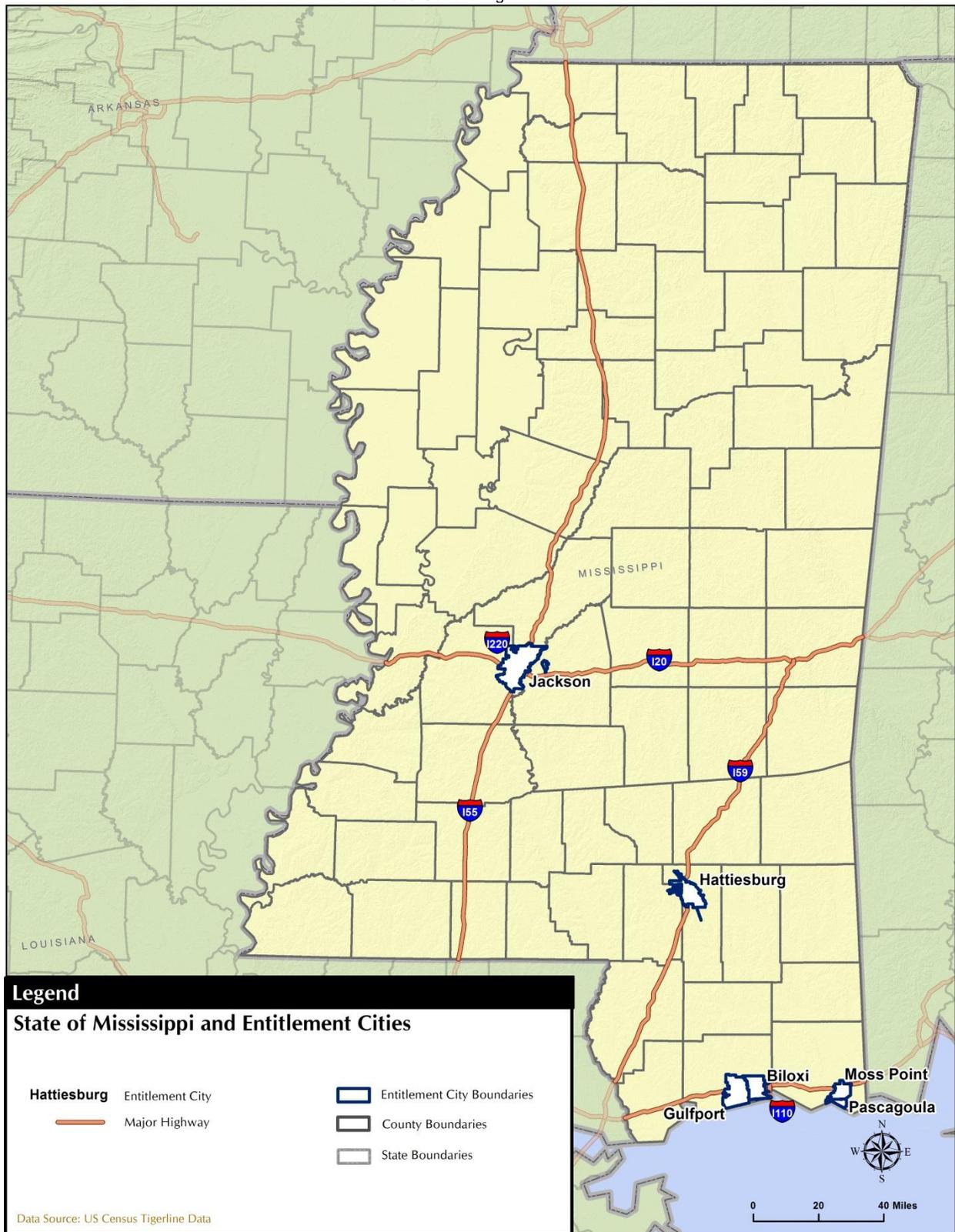
RESEARCH METHODOLOGY

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

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

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

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



Home Mortgage Disclosure Act Data

To examine possible fair housing issues in the home mortgage market, Home Mortgage Disclosure Act (HMDA) data were analyzed. The HMDA was enacted by Congress in 1975 and has since been amended several times. It is intended to provide the public with loan data that can be used to determine whether financial institutions are serving the housing credit needs of their communities and to assist in identifying possible discriminatory lending patterns. HMDA requires lenders to publicly disclose the race, ethnicity, and sex of mortgage applicants, along with loan application amounts, household income, the Census tract in which the home is located, and information concerning prospective lender actions related to the loan application. For this analysis, HMDA data from 2004 through 2012 were analyzed, with the measurement of denial rates by Census tract and by race and ethnicity of applicants the key research objectives. These data were also examined to identify the groups and geographic areas most likely to encounter higher denial rates and receive loans with unusually high interest rates.

Fair Housing Complaint Data

Housing complaint data were used to analyze discrimination in the renting and selling of housing. HUD provided fair housing complaint data for the 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 329 fair housing complaints from within non-entitlement areas of the State allowed for inspection of the tone, the relative degree and frequency of certain types of unfair housing practices, and the degree to which complaints were found to be with cause. Analysis of complaint data focused on determining which protected classes may have been disproportionately impacted by housing discrimination based on the number of complaints, while acknowledging that many individuals may be reluctant to step forward with a fair housing complaint for fear of retaliation or similar repercussion.

Fair Housing Survey

HUD recommends that surveys be conducted during the AI process to gain input for the public regarding perceived impediments to fair housing choice in an area. As such, the State elected to utilize a survey instrument as a means to encourage public input in the AI process. This step was a cost-effective and efficient method to utilize research resources.

The survey targeted individuals involved in the housing arena, although anyone was allowed to complete the survey. In addition to gathering data, this survey was utilized to help promote public involvement throughout the AI process. The 2014 State of Mississippi Fair Housing Survey, an internet-based instrument, has received 256 responses as of July 2014.

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

Federal, State, and Local Fair Housing Laws

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

Fair Housing Activities

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

Barriers to Fair Housing Choice in the Private Sector

This section addressed fair housing in the State of Mississippi's private housing sector and offered a series of two-part questions. The first part asked respondents to indicate awareness of questionable practices or barriers to fair housing choice in a variety of private sector industries, and the second part requested a narrative description of these questionable practices or concerns if an affirmative response was received. The specific areas of the private sector that respondents were asked to examine included the:

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

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

Fair Housing in the Public Sector

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

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

- Permitting processes,
- Housing construction standards,
- Neighborhood or community development policies, and
- Any other public administrative actions or regulations.

The questions in this section were used to identify fair housing issues in the State regarding zoning, building codes, accessibility compliance, subdivision regulations, displacement issues, development practices, residency requirements, property tax policies, land use policies, and NIMBYism.⁷

Additional Questions

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

Public Involvement

This section discusses analysis of fair housing in the State of Mississippi 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 State-wide impediments to fair housing choice. However, survey and forum comments that support findings from other parts of the analysis reinforce findings from other data sources concerning impediments to fair housing choice.

Research Conclusions

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

⁷ "Not In My Backyard" mentality

SECTION II. SOCIO-ECONOMIC CONTEXT

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

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

DEMOGRAPHICS

As part of the essential review of the background context of the markets which housing choices are made in non-entitlement areas of Mississippi, 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. Extreme concentrations of protected class populations do not necessarily imply impediments to fair housing choice, but may represent the results of impediments identified in other data.

POPULATION DYNAMICS

Table II.1 at right presents population counts in non-entitlement areas of the State of Mississippi, as drawn from the 2000 and 2010 Censuses, intercensal estimates for 2001 through 2009, and postcensal estimates from 2011 through 2013. In total, the population in non-entitlement areas of the State grew from 2,451,801 persons in 2000 to an estimated 2,619,259 in 2013, an increase of 6.8 percent. These data suggest that population growth in Mississippi accelerated from 2000 through 2009 and has since begun to slow.

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

Year	Estimate
Census 2000	2,451,801
July 2001 Est.	2,460,459
July 2002 Est.	2,468,920
July 2003 Est.	2,481,996
July 2004 Est.	2,501,163
July 2005 Est.	2,519,795
July 2006 Est.	2,535,327
July 2007 Est.	2,558,774
July 2008 Est.	2,579,601
July 2009 Est.	2,591,361
Census 2010	2,599,851
July 2011 Est.	2,606,561
July 2012 Est.	2,613,484
July 2013 Est.	2,619,259
Change 00 – 13	6.8%

POPULATION BY AGE

Population growth between the 2000 and 2010 Censuses was most rapid in older cohorts, as shown in Table II.2, below. The fastest growing group included residents aged 55 to 64, which grew by 42.8 percent over the decade. This led to an increase in the share of residents represented by this age cohort, from 8.8 percent in 2000 to 11.9 percent in 2010. The population aged 65 and older also accounted for a larger share of the population in 2010, or 13.1 percent, than it had at the beginning of the decade. All other age cohorts grew at a rate that was below the overall rate of 6 percent, and consequently came to account for a smaller share of the population. In the case of residents aged 5 to 19, the population declined by 3.2 percent over the decade. Residents in this each group, along with residents aged between 35 and 54 years, represented the two largest cohorts in both Census counts.

Table II.2

Population by Age

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

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	175,043	7.1%	182,953	7.0%	4.5%
5 to 19	578,453	23.6%	559,977	21.5%	-3.2%
20 to 24	174,981	7.1%	175,165	6.7%	.1%
25 to 34	324,595	13.2%	331,816	12.8%	2.2%
35 to 54	683,518	27.9%	700,917	27.0%	2.5%
55 to 64	216,325	8.8%	308,960	11.9%	42.8%
65 or Older	298,886	12.2%	340,063	13.1%	13.8%
Total	2,451,801	100.0%	2,599,851	100.0%	6.0%

As noted, the cohort of residents over the age of 65 grew at more than twice the rate of the overall population between 2000 and 2010. Overall, most of the growth in the cohort of persons aged over 65 years was accounted for by rapid growth in the number of residents at the lower end of the spectrum, as shown in Table II.3, below. The number of residents aged 65-66 years grew by 30.5 percent, the fastest rate of growth observed in the elderly cohort. In the next youngest cohort, the rate of growth was 22.7 percent, still well above the overall growth rate of 13.8 percent for the elderly cohort.

Table II.3

Elderly Population by Age

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

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	35,336	11.8%	46,128	13.6%	30.5%
67 to 69	50,769	17.0%	62,270	18.3%	22.7%
70 to 74	76,233	25.5%	84,384	24.8%	10.7%
75 to 79	58,983	19.7%	62,416	18.4%	5.8%
80 to 84	40,282	13.5%	45,892	13.5%	13.9%
85 or Older	37,283	12.5%	38,973	11.5%	4.5%
Total	298,886	100.0%	340,063	100.0%	13.8%

POPULATION BY RACE AND ETHNICITY

Over 95 percent of residents in non-entitlement areas of the state were either white or black in both Census counts, as shown in Table II.4, below. However, the rate of growth in these populations was relatively slow over the decade. The white population accounted for a smaller share of the population in 2010 than it had in 2000, while the black population accounted for a slightly larger share. More rapid growth was observed in the Asian and American Indian populations, though neither group accounted for more than 1 percent of the population in 2010. Rapid growth was also observed in the Hispanic population, which accounted for 1.3 percent of the population in the state's non-entitlement areas in 2000. This population doubled between 2000 and 2010 as a share of the total population, and more than doubled in number. By the end of the decade, 2.6 percent of Mississippi residents were Hispanic.

Table II.4
Population by Race and Ethnicity
 Non-Entitlement Areas of Mississippi
 2000 & 2010 Census SF1 Data

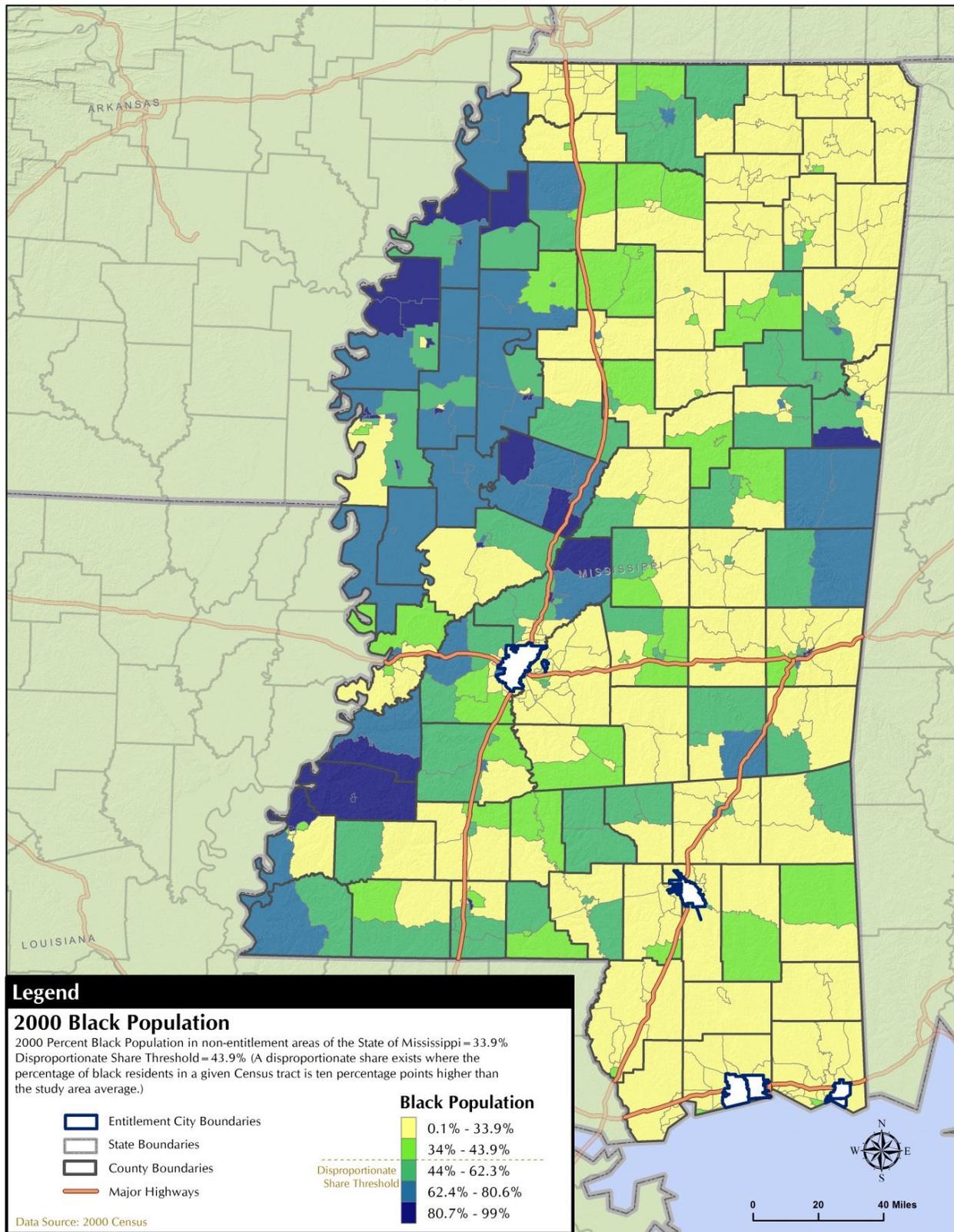
Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	1,570,081	64.0%	1,618,335	62.2%	3.1%
Black	830,193	33.9%	885,796	34.1%	6.7%
American Indian	10,724	.4%	14,089	.5%	31.4%
Asian	13,255	.5%	21,247	.8%	60.3%
Native Hawaiian/ Pacific Islander	501	.0%	900	.0%	79.6%
Other	11,356	.5%	31,303	1.2%	175.7%
Two or More Races	15,691	.6%	28,181	1.1%	79.6%
Total	2,451,801	100.0%	2,599,851	100.0%	6.0%
Non-Hispanic	2,419,153	98.7%	2,533,181	97.4%	4.7%
Hispanic	32,648	1.3%	66,670	2.6%	104.2%

The geographic distribution of racial and ethnic minorities can vary significantly throughout a community. The U.S. Department of Housing and Urban Development (HUD) has determined that an area demonstrates a disproportionate share of a population when the percentage of that population is 10 percentage points or more above the study area average. For example, the black population represented 33.9 percent of the total population in 2000. Therefore, any area in the State in which black persons accounted for more than 43.9 percent of the population in that year was considered to hold a disproportionate share of that population.

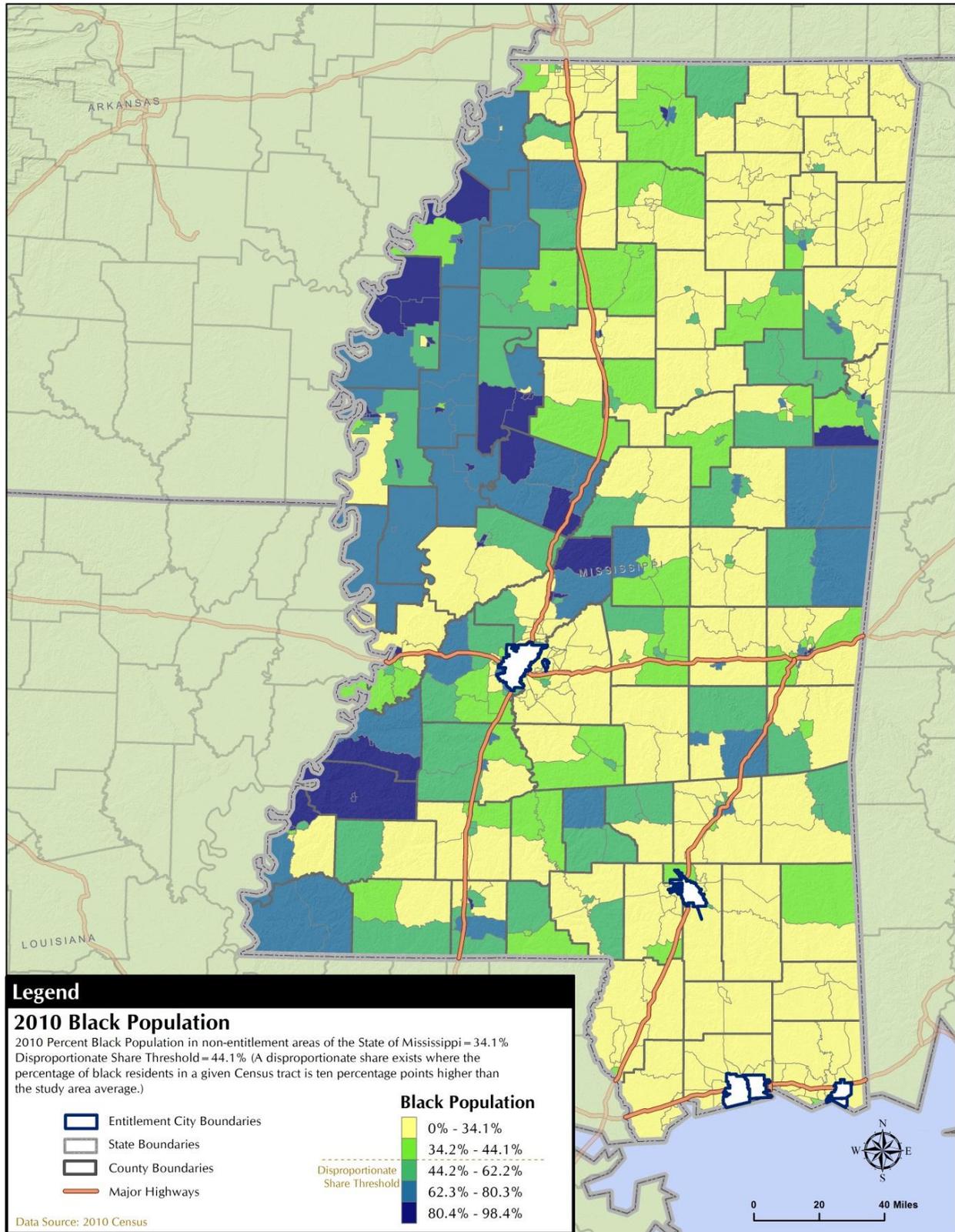
Areas with disproportionately high concentrations of black residents appeared throughout many of the non-entitlement areas of the state in 2000, though the highest concentrations tended to be located in Census tracts in the north and south Delta region, as shown in Map II.1, on the following page. In many of the latter areas, more than 8 residents in 10 were black. Tracts with such highly disproportionate shares of black residents tended to be small urban Census tracts, though there were some large rural tracts with disproportionate shares of black residents as well.

The general pattern in the distribution of the black population that was observed in 2000 had changed little by 2010 in spite of the slight growth in the black population between the Censuses. In both 2000 and 2010, highly disproportionate concentrations of black residents tended to be located in the Delta region. However, there were exceptions in both years—i.e., Census tracts in and around the city of Columbus in the east—as shown in Map II.2, on page 35.

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



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



The Hispanic population was disproportionately concentrated in three Census tracts in 2000— all of these were located within 40 miles of Jackson, as shown in Map II.3, on the following page. In a large rural area to the north of Jackson, nearly 16 percent of residents were Hispanic. Between 11.4 and 14.6 percent of residents were Hispanic in Census tracts in and around Morton and Forest, two small communities to the east of Jackson.

These latter two Census tracts were observed to hold the highest concentrations of Hispanic residents in 2010, as shown in Map II.4, on page 38. In those Census tracts, more than a quarter of residents were Hispanic in 2010. In addition, approximately a quarter of all residents in the large rural Census tract to the east of Natchez were Hispanic, as was more than a fifth of residents in one small Census tract near Meridian. Areas with moderately disproportionate concentrations of Hispanic residents were scattered throughout the northern part of the state.

DISABILITY STATUS

The Census Bureau defines disability as 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. Among all persons aged 5 years or older, 23.6 percent were living with a disability in the State of Mississippi in 2000, as shown in Table II.5, below. This share represented 525,177 persons living with a disability in the State. Five-Year ACS data from 2012 indicate that the share of persons with disabilities fell to 16.5 percent by 2012, as shown in Table II.6, below. However, due to changes in the ACS questionnaire that were implemented in 2008, figures with 2012 are not directly comparable with figures from 2000.

Table II.5

Disability by Age

Non-Entitlement Areas of Mississippi
2000 Census SF3 Data

Age	Total	
	Disabled Population	Disability Rate
5 to 15	24,306	5.8%
16 to 64	353,829	23.2%
65 and older	147,042	51.9%
Total	525,177	23.6%

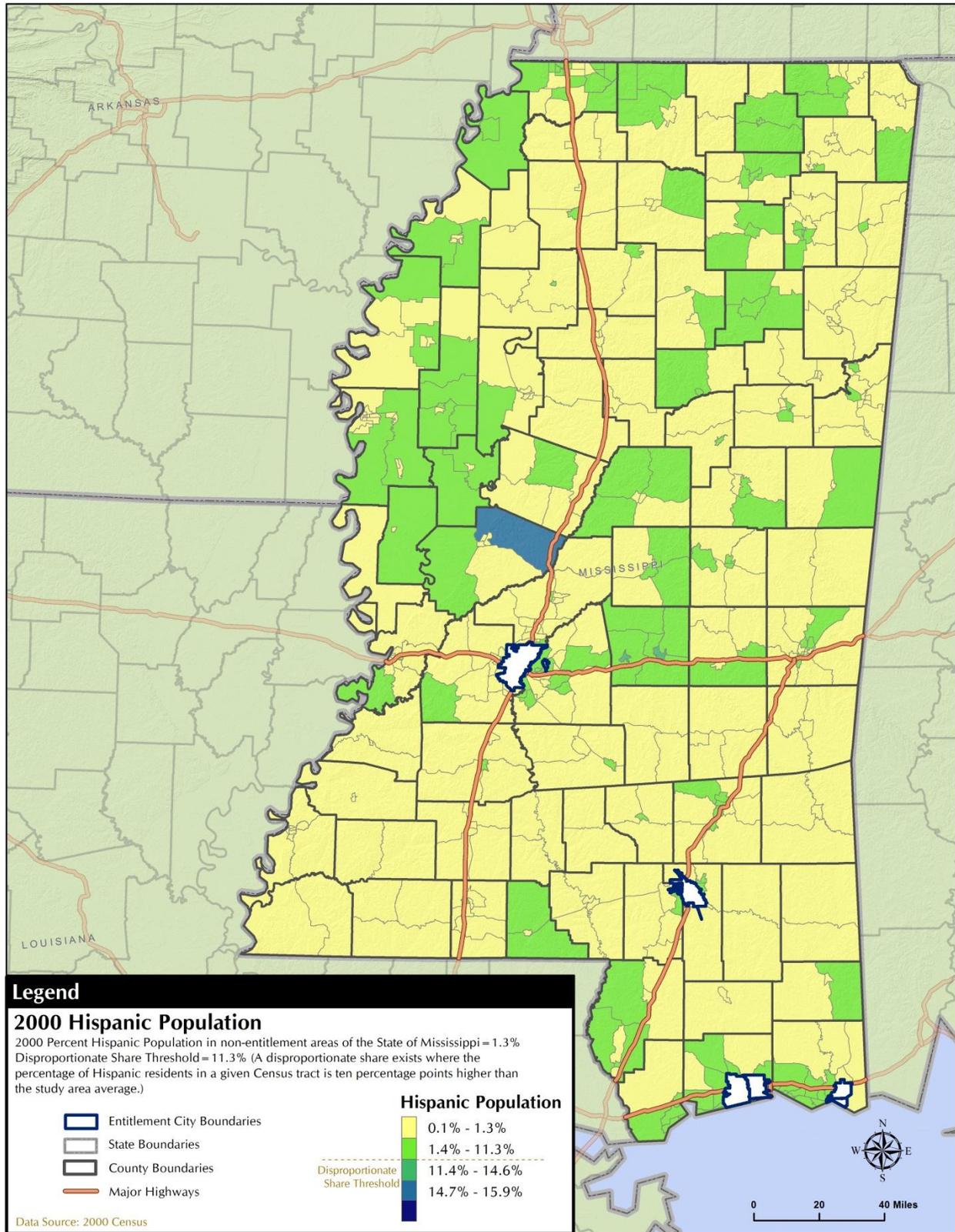
Table II.6

Disability by Age

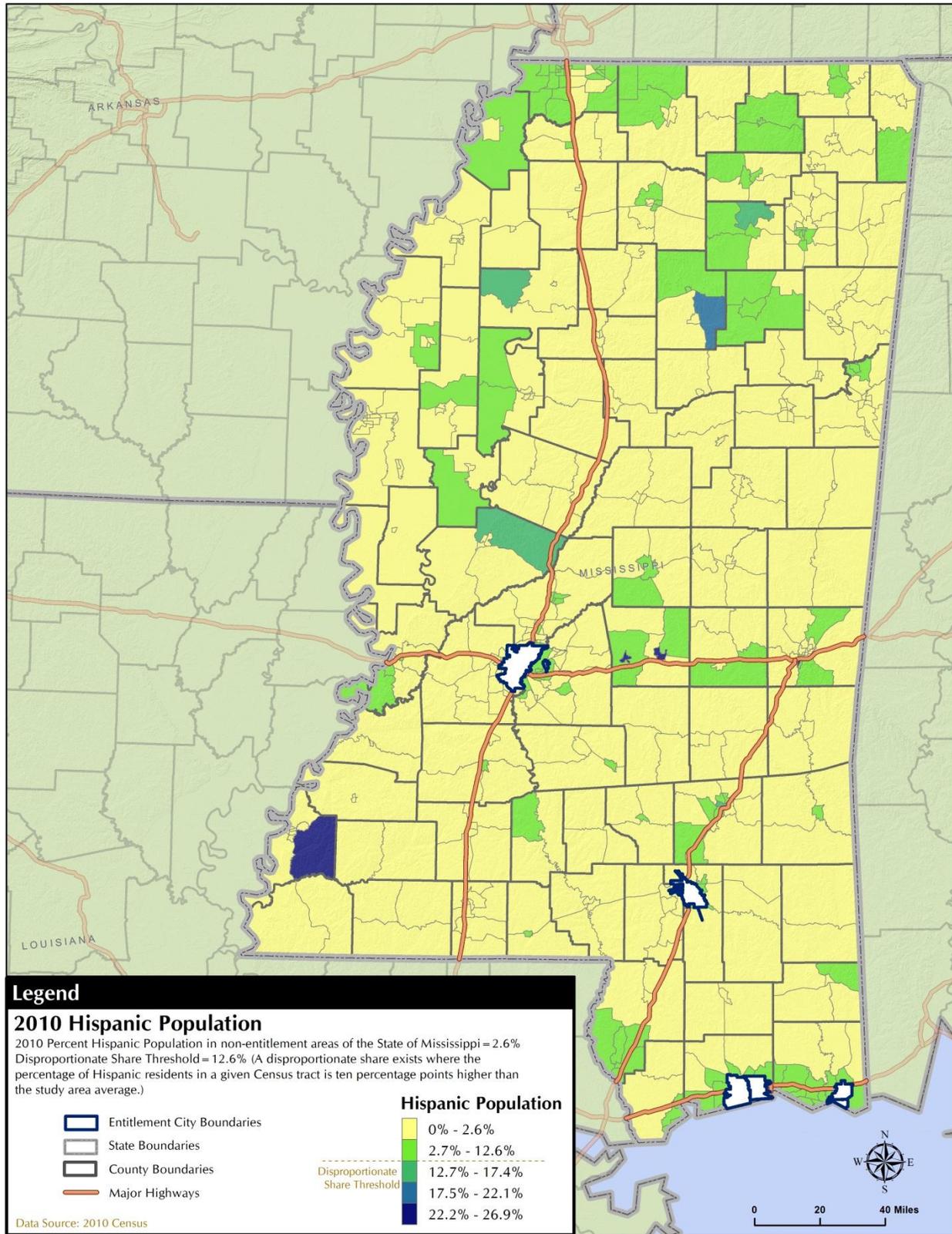
Non-Entitlement Areas of Mississippi
2012 Five-Year ACS Data

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	911	1.0%	694	.8%	1,605	.9%
5 to 17	18,813	7.7%	11,313	4.8%	30,126	6.3%
18 to 34	22,687	8.3%	20,257	6.9%	42,944	7.6%
35 to 64	93,122	19.8%	99,870	19.3%	192,992	19.6%
65 to 74	32,543	36.7%	37,140	35.7%	69,683	36.2%
75 or Older	29,376	56.8%	52,974	61.5%	82,350	59.7%
Total	197,452	16.2%	222,248	16.8%	419,700	16.5%

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



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



Disability data from the 2008 to 2012 ACS are not available by Census tract; the geographic distribution of the disabled population in non-entitlement areas of Mississippi as of the 2000 Census is presented in Map II.5, on the following page. More than 35 percent of residents of Ellisville and Laurel were living with disabilities in that year, along with 34 percent of residents in the northern portion of Smith County. There were no other areas with disproportionate shares of persons with disabilities in 2000, though Census tracts with above-average shares of residents with disabilities were widespread in non-entitlement areas of the state.

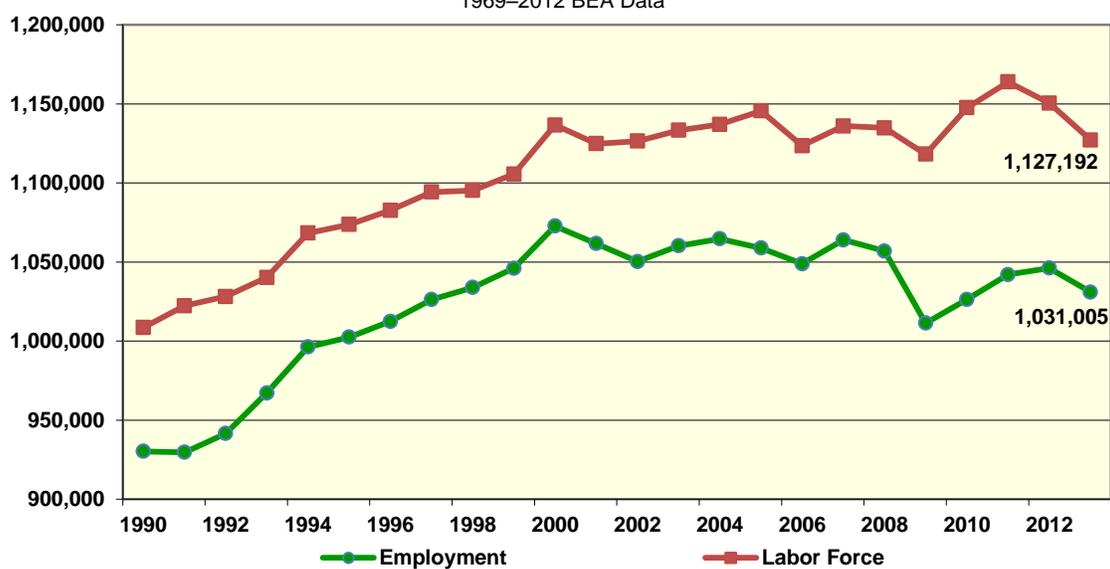
ECONOMICS

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

LABOR FORCE AND EMPLOYMENT

Data regarding the labor force, defined as the total number of persons working or looking for work and gathered from the Bureau of Labor Statistics (BLS), can be segmented by entitlement and non-entitlement areas of Mississippi. Employment figures for non-entitlement areas of Mississippi from 1990 to 2012, presented below in Diagram II.1, show that the number of employed grew consistently between 1990 and 2000, though not always at a steady rate. After 2000, the number of employed dropped by around 20,000 workers, and the level of employment was uneven through 2008. After 2008, the number of employed fell by nearly 50,000, the most dramatic drop in the number of employed observed in this period. The number of employed began to rise after 2009 before falling again in 2013.

Diagram II.1
Employment and Labor Force
 Non-Entitlement Areas of Mississippi
 1969–2012 BEA Data



Map II.5
Disabled Population by Census Tract
 Non-Entitlement Areas of Mississippi
 2000 Census Data

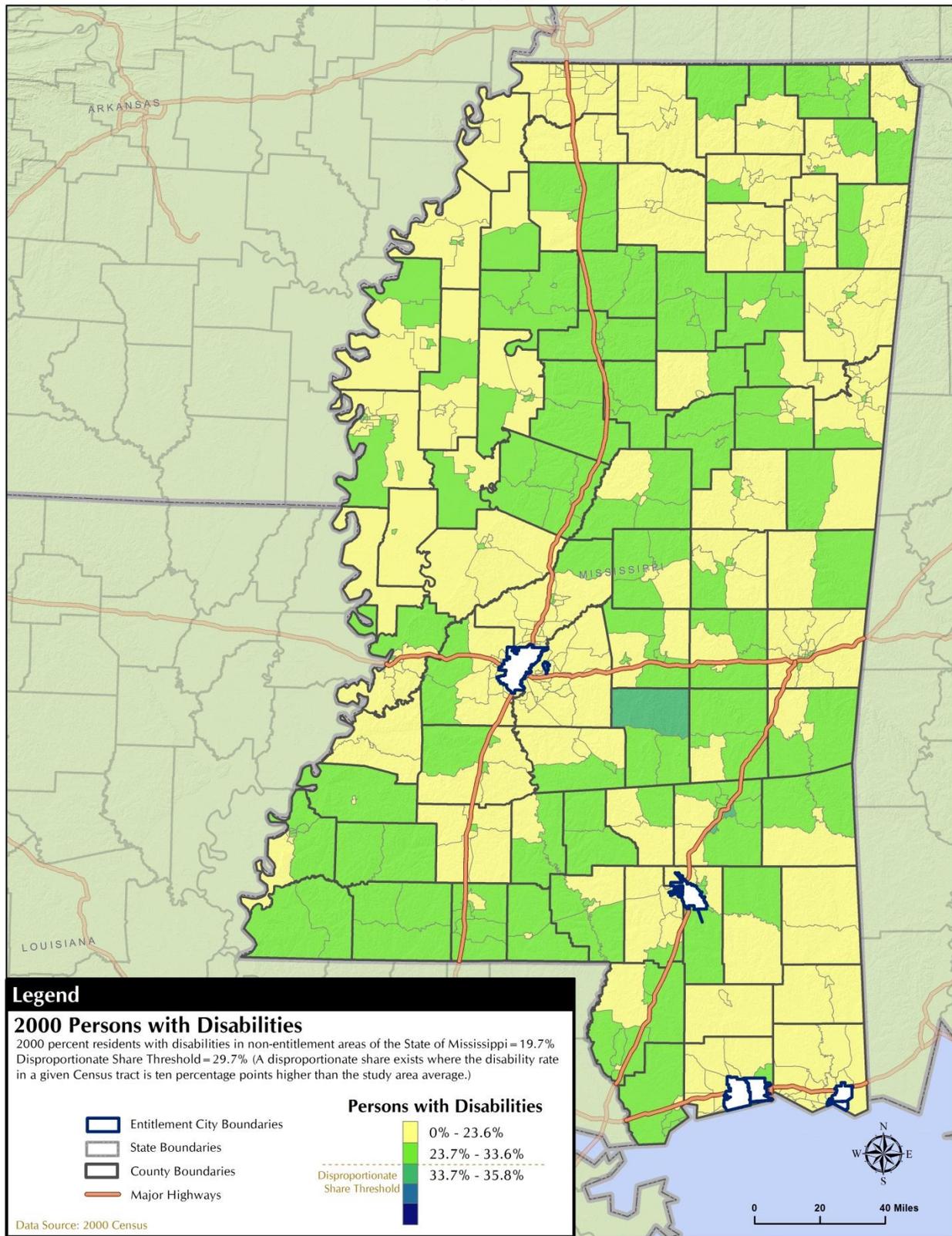
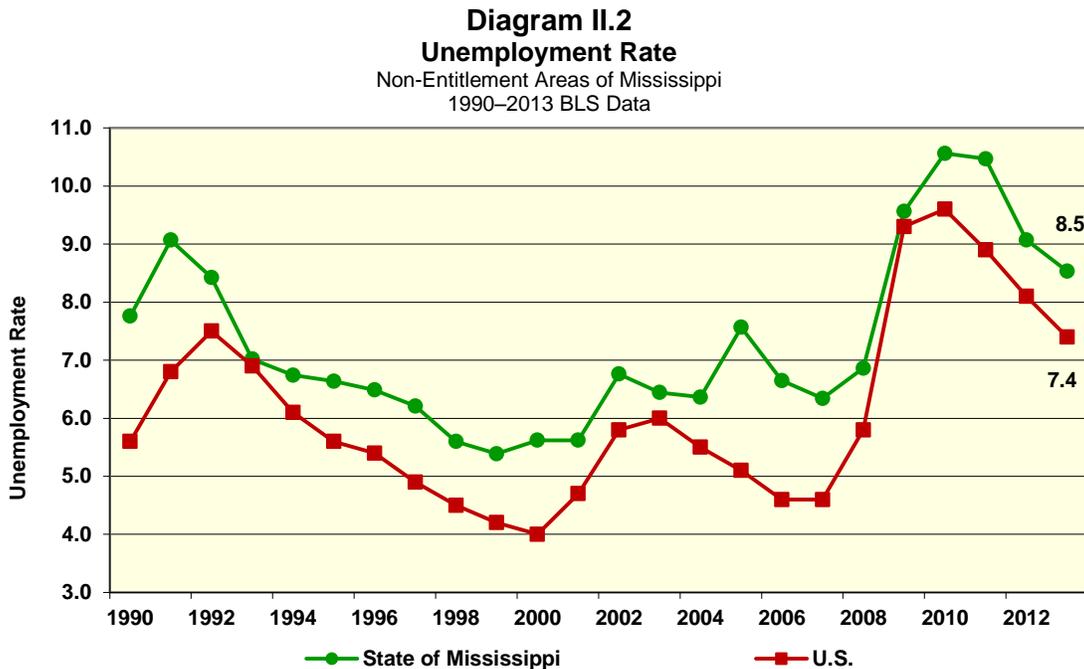
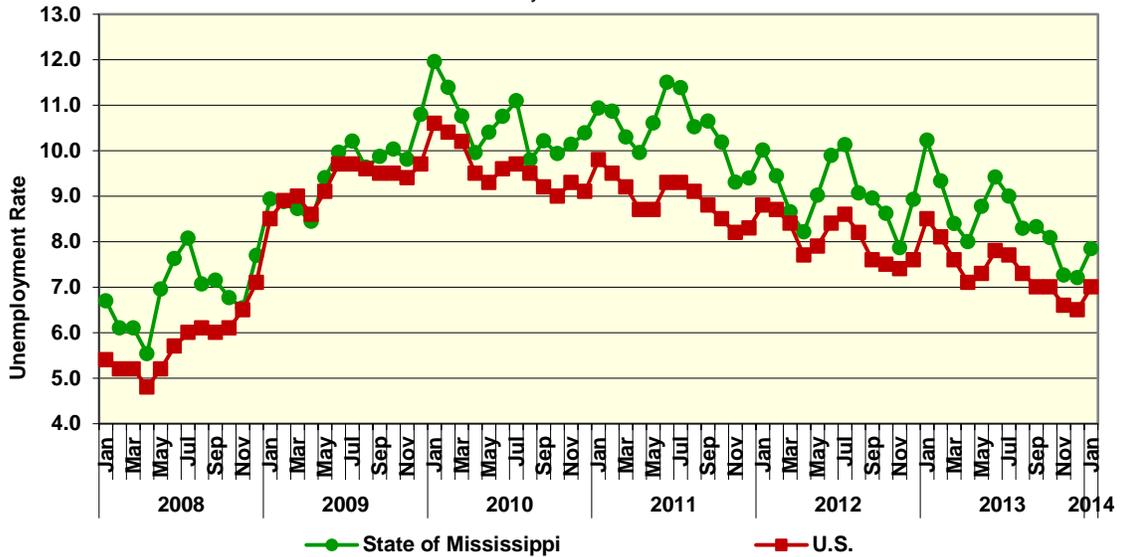


Diagram II.2, below, presents the yearly unemployment rates in the non-entitlement areas of Mississippi and the nation as a whole between 1990 and 2012. The unemployment rate represents the gap between the number of employed persons and the number of persons in the labor force. The unemployment rate in non-entitlement Mississippi was higher than the unemployment rate at the national level in every year from 1990 to 2013, though trends in unemployment at the state level generally mirrored trends at the national level. In non-entitlement areas of Mississippi, the unemployment rate fell sharply after 1991, and continued to drop through 1999. In 2000, the unemployment rate began to increase, peaking in 2002 and 2005. However, the most dramatic increase in unemployment in non-entitlement areas of Mississippi began after 2008: By 2009, the unemployment rate had grown by 2.7 percentage points; in 2010 it increased by another percentage point. The unemployment rate peaked in 2010 at 10.6 percent, and began to fall after 2011.



During the spike in unemployment that began after 2008, the state continued to experience marked seasonal variation in the unemployment rate, as shown in Diagram II.3, on the following page. In most years, unemployment spiked during the month of January and again during the summer months, generally in July. During this entire period, seasonal variation in the unemployment rate was more pronounced at the national level than it was in non-entitlement areas of the Mississippi.

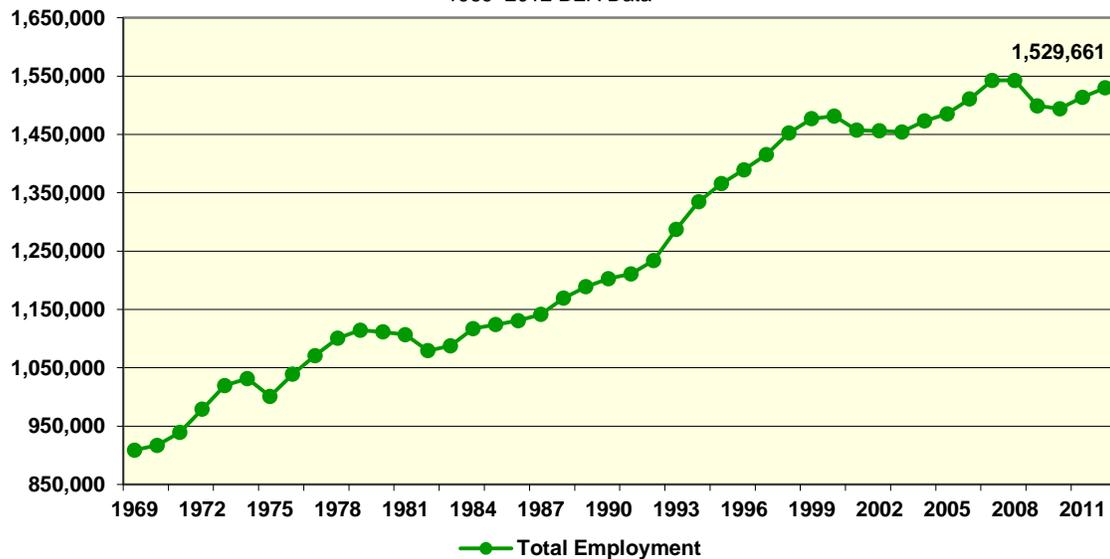
Diagram II.3
Monthly Unemployment Rate
 Non-Entitlement Areas of Mississippi
 2008–January 2014 BLS Data



FULL- AND PART-TIME EMPLOYMENT AND EARNINGS

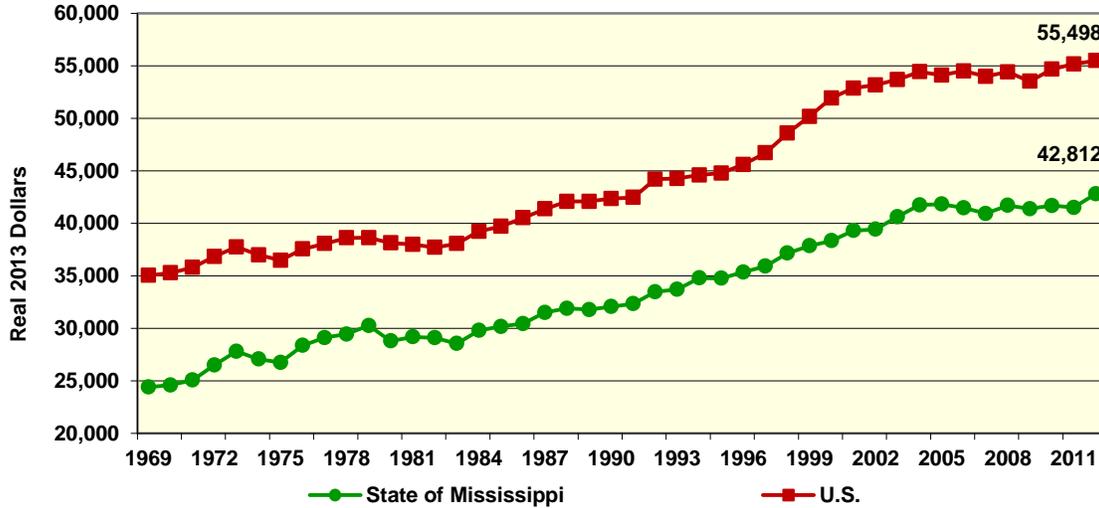
Full employment, as measured by the Bureau of Economic Analysis, refers to the total number of part-time and full-time jobs in the state as a whole. Data Unlike data from the BLS, people who work more than one job are counted more than once. In 1969, there were 908,677 jobs in non-entitlement areas of Mississippi, as shown in Diagram II.4, below. On the eve of the recession of the late 2000s, the number of jobs in Mississippi had grown to 1,542,564 in 2008. After 2008 full employment fell for two consecutive years, but has since begun to rise again. By 2012, the total number of jobs in Mississippi stood at 1,529,661.

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



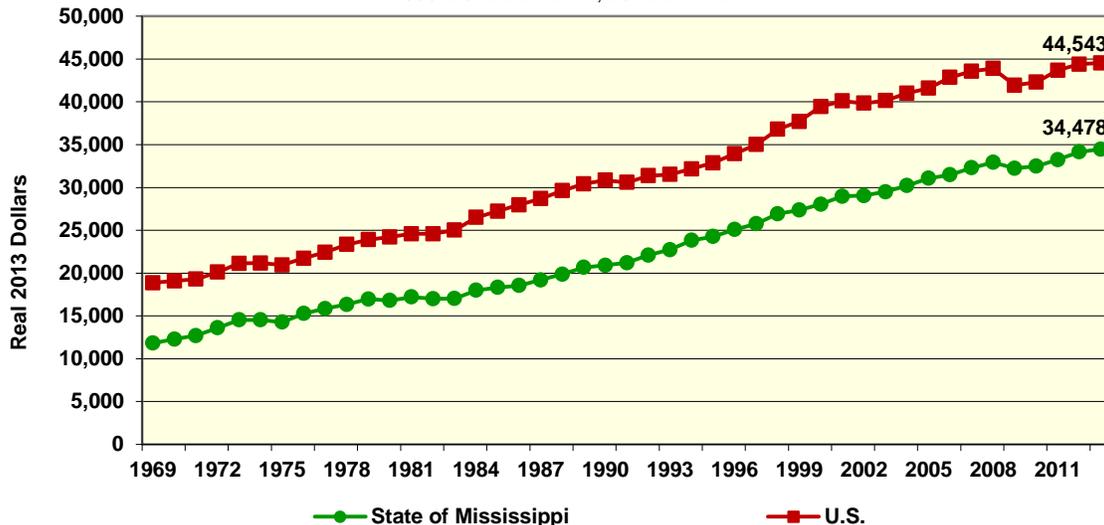
Though growth in the total number of jobs was subject to some fluctuation between 1969 and 2008, growth in real average earnings per job in Mississippi was relatively even over the same period, as shown in Diagram II.5, below, though a minor decline in earnings began in 2004. In spite of the sharp declines in employment and full employment described previously, real average earnings per job held steady through the recession of the late 2000s, and ticked upward in 2012. In that year, the average worker earned \$42,812 at his or her job.

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



Like growth in earnings, real average per capita income in Mississippi grew steadily between 1969 and 2008, as shown in Diagram II.6, below. Also mirroring the trend in real average earnings per job was the relatively minor impact of the global recession on per capita incomes in Mississippi.

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



HOUSEHOLD INCOME

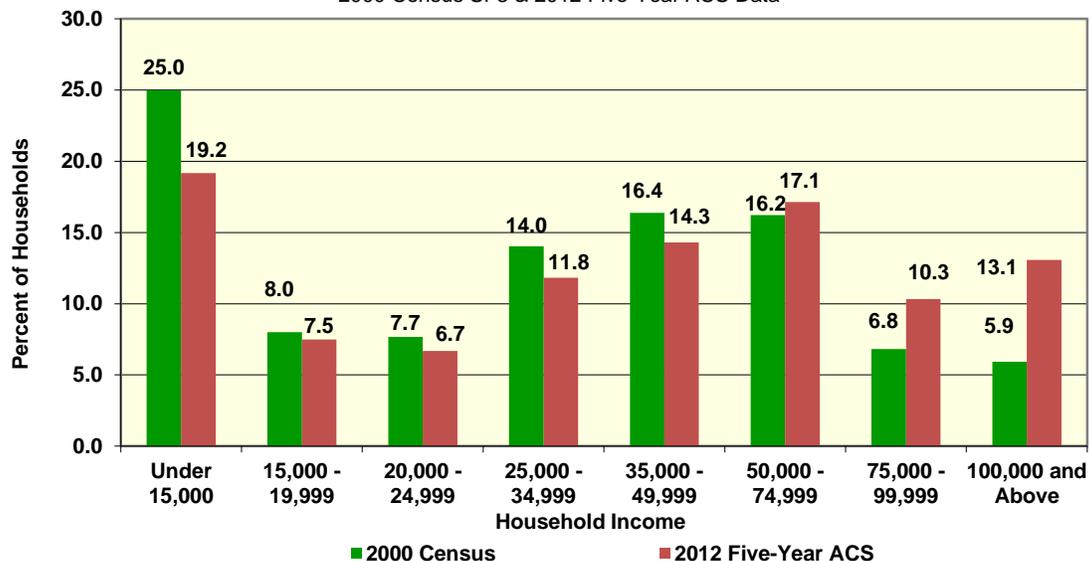
Household incomes in the non-entitlement areas of the state in 2000 and 2012 are shown below in Table II.7. Between 2000 and 2012, households in non-entitlement areas of Mississippi experienced a shift toward higher incomes as measured in current dollars⁸. The shares of households in all income categories below \$50,000 per year declined between 2000 and 2012, while the shares of households making \$50,000 or more increased in all income categories after the 2000 Census.

Table II.7
Households by Income
 Non-Entitlement Areas of Mississippi
 2000 Census SF3 & 2012 Five-Year ACS Data

Income	2000 Census		2012 Five-Year ACS	
	Households	% of Total	Households	% of Total
Less than \$15,000	224,832	25.0%	182,097	19.2%
\$15,000 to \$19,999	72,028	8.0%	71,068	7.5%
\$20,000 to \$24,999	69,069	7.7%	63,579	6.7%
\$25,000 to \$34,999	126,278	14.0%	112,369	11.8%
\$35,000 to \$49,999	147,354	16.4%	135,745	14.3%
\$50,000 to \$74,999	146,029	16.2%	162,686	17.1%
\$75,000 to \$99,999	61,334	6.8%	98,033	10.3%
\$100,000 or More	53,326	5.9%	124,148	13.1%
Total	900,250	100.0%	949,725	100.0%

Diagram II.7 below presents these income distributions graphically and further demonstrates the shift from lower- and medium- to higher-income households over time. Note that in all lower income categories, the proportion of households in 2012 was less than that of 2000. The opposite is true in higher-income households.

Diagram II.7
Households by Income
 Non-Entitlement Areas of Mississippi
 2000 Census SF3 & 2012 Five-Year ACS Data



⁸ "Current dollars" represent monetary amounts that have not been adjusted for inflation.

POVERTY

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

In non-entitlement areas of the State of Mississippi, the poverty rate in 2000 was 19.7 percent, with 468,188 persons considered to be living in poverty, as shown in Table II.8 below. Nearly 58,204 children aged 6 and below were counted as living in poverty at that time, in addition to over 54,941 persons aged 65 and older. The 2008 to 2012 ACS data showed that poverty in the State grew to 21.7 percent in 2012.

Table II.8
Poverty by Age

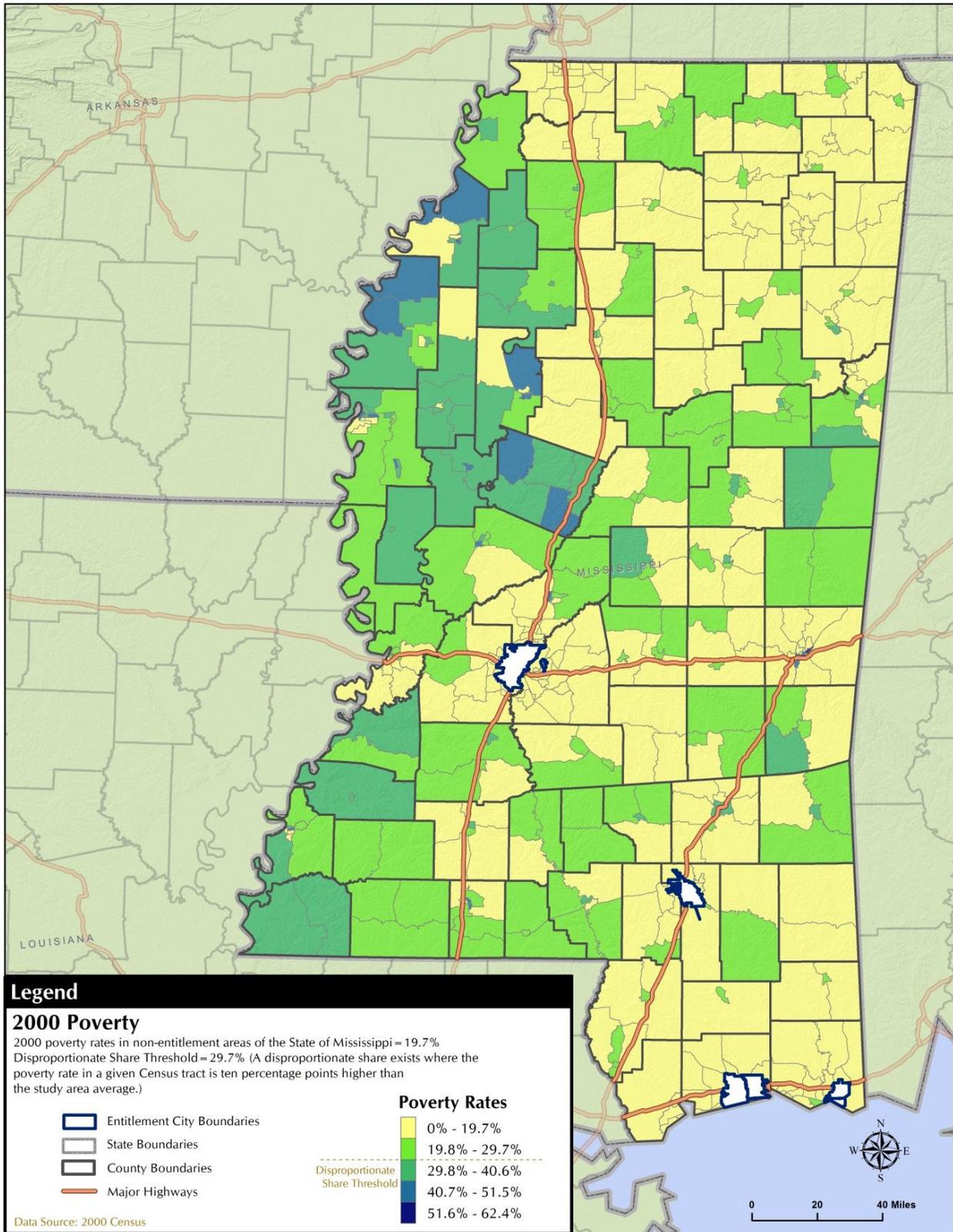
Non-Entitlement Areas of Mississippi
2000 Census SF3 & 2012 Five-Year ACS Data

Age	2000 Census		2012 Five-Year ACS	
	Persons in Poverty	% of Total	Persons in Poverty	% of Total
Under 6	58,204	12.4%	75,050	13.7%
6 to 17	116,986	25.0%	126,681	23.2%
18 to 64	238,057	50.8%	296,210	54.2%
65 or Older	54,941	11.7%	48,800	8.9%
Total	468,188	100.0%	546,741	100.0%
Poverty Rate	19.7%	.	21.7%	.

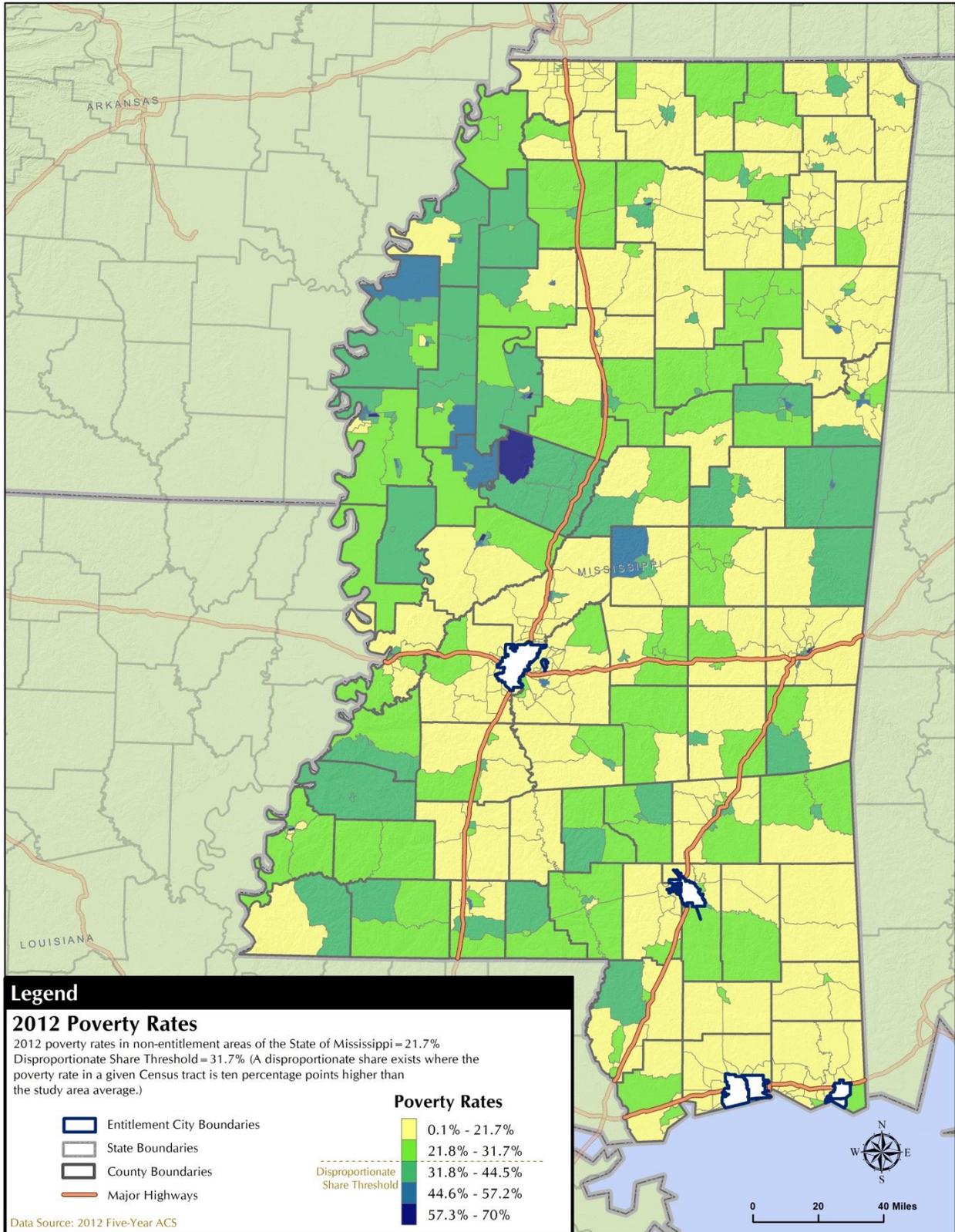
Poverty was not spread evenly throughout the State, as some Census tracts had much higher rates of poverty than others. Tracts with disproportionately high rates of poverty in 2000 tended to be located in the west of the state, especially in the Delta region, as shown in Map II.6, on the following page. Census tracts in which the poverty rate was between 40.7 and 51.5 percent were located almost exclusively in this area. The highest poverty rate in non-entitlement areas was also located in this area; specifically in the town of Clarksdale, where 62.4 percent of residents were living in poverty in 2000. However, the next highest poverty rates were observed in Census tracts in and around Meridian. Tracts with above-average and disproportionate rates of poverty were largely absent from Census tracts in the Gulf Coast region.

By 2012, the overall poverty rate had grown and areas with disproportionately high rates of poverty had become more widespread, as shown in Map II.7 on page 47. The highest rate of poverty was observed in a Census tract in Oxford, and areas with highly disproportionate concentrations of poverty, in which the poverty rate exceeded 57.3 percent, included Yazoo City, Greenwood, Natchez, Greenville, and Columbus. In addition, Census tracts in which the poverty rate lay between 44.6 and 57.2 percent were scattered throughout the northern portion of the state. Note that the poverty rates in some of these areas exceeded the highest poverty rates observed in 2000; such areas included tracts in and around Columbus, Greenville, and Canton.

Map II.6
Poverty Rate by Census Tract
 Non-Entitlement Areas of Mississippi
 2000 Census Data



Map II.7
Poverty Rate by Census Tract
 Non-Entitlement Areas of Mississippi
 2012 Five-Year ACS Data



HOUSING

Simple counts of housing by age, type, tenure, and other characteristics form the basis for the housing stock background, suggesting the available housing in 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 problems 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

In total, the number of housing units in non-entitlement areas of Mississippi increased by 11.1 percent between 2000 and 2010, from 998,175 to 1,109,503 units. During this time, the population of the non-entitlement areas of Mississippi increased by only 6.0 percent, which suggests that housing production outpaced population growth.

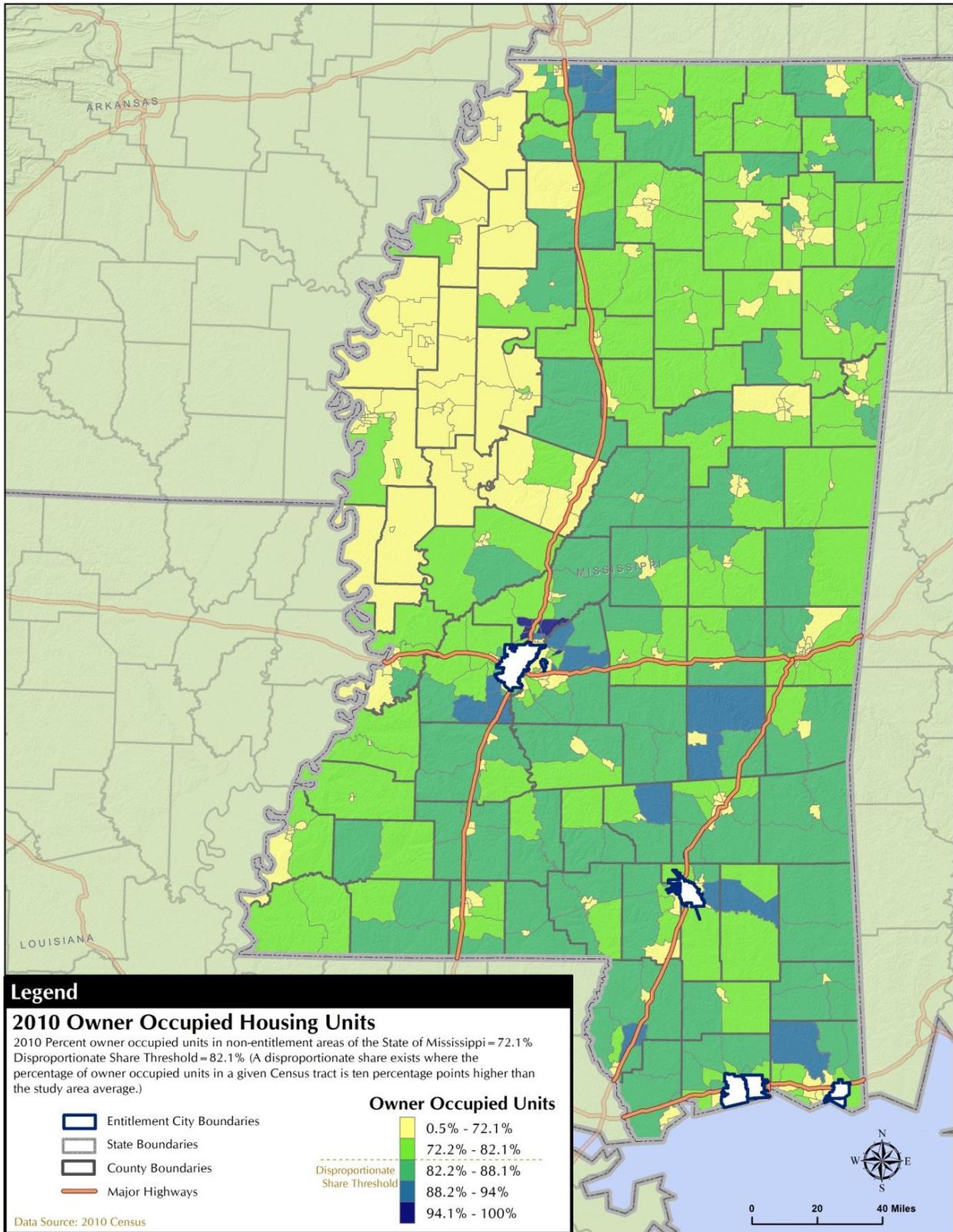
Between 2000 and 2010, the number of occupied housing units increased by 8.5 percent, as shown in Table II.9, below. During that time, non-entitlement areas of Mississippi experienced a shift away from owner-occupied toward renter-occupied units, as the rate of homeownership slipped from 75.0 percent to 72.1 percent and the rate of rental occupancy grew by nearly three percentage points. The number of vacant housing units, on the other hand, grew by nearly 2 percentage points, and accounted for 12.1 percent of housing units in 2010.

Table II.9
Housing Units by Tenure
Non-Entitlement Areas of Mississippi
2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	899,175	90.1%	975,525	87.9%	8.5%
Owner-Occupied	674,688	75.0%	703,764	72.1%	4.3%
Renter-Occupied	224,487	25.0%	271,761	27.9%	21.1%
Vacant Housing Units	99,000	9.9%	133,978	12.1%	35.3%
Total Housing Units	998,175	100.0%	1,109,503	100.0%	11.1%

The geographic distribution of owner-occupied units in the State of Mississippi in 2010 is presented on the following page in Map II.8. As mentioned previously, 72.1 percent of occupied housing units counted in the 2010 Census were owner-occupied. Though there were areas with disproportionate concentrations of owner-occupied units scattered throughout non-entitlement areas of the state, areas with the highest concentrations of owner-occupied units tended to be clustered around major urban areas of the state. More than 94 percent of occupied housing units were owner-occupied in Census tracts surrounding Jackson and Hattiesburg. Census tracts in which roughly nine-tenths of these units were owner-occupied were clustered in the same areas, as well as near the coastal entitlement cities and in Census tracts in the north of the state, located near Memphis, Tennessee.

Map II.8
Owner-Occupied Housing Units
 Non-Entitlement Areas of Mississippi
 2010 Census Data



By contrast, renter-occupied units tended to be disproportionately concentrated in areas outside of major urban areas, as shown in Map II.9, on the following page. The highest concentrations of these units were observed in smaller urban areas in the north of the state and in a large area encompassing much of the Delta region. In spite of the relative paucity of areas with high concentrations of renter-occupied units in and around entitlement cities, there were some Census tracts near Jackson with disproportionate concentrations of these units, and nearly all occupied units were renter-occupied in a small Census tract near Gulfport.

VACANT HOUSING

At the time of the 2000 Census, the vacant housing stock included 99,000 units. By 2010 this figure had reached 133,978, as shown in Table II.10, below. A substantial portion, or approximately one-fifth, of the vacant units in both years was for seasonal, recreational, or occasional use. The number of vacant units for rent increased over the decade and accounted for 24.2 percent of vacant units in 2010. A substantial increase was observed in the number of “other vacant” units, which increased by over 45 percent over the decade and came to account for 40.1 percent of all vacant units by 2010. The units accounted for the largest share of vacant units in both 2000 and 2010. In 2010, vacant units were disproportionately concentrated in Census tracts in the extreme northeast and southwest corners of the state, as well as a handful or tracts in between, as shown in Map II.10 on page 52.

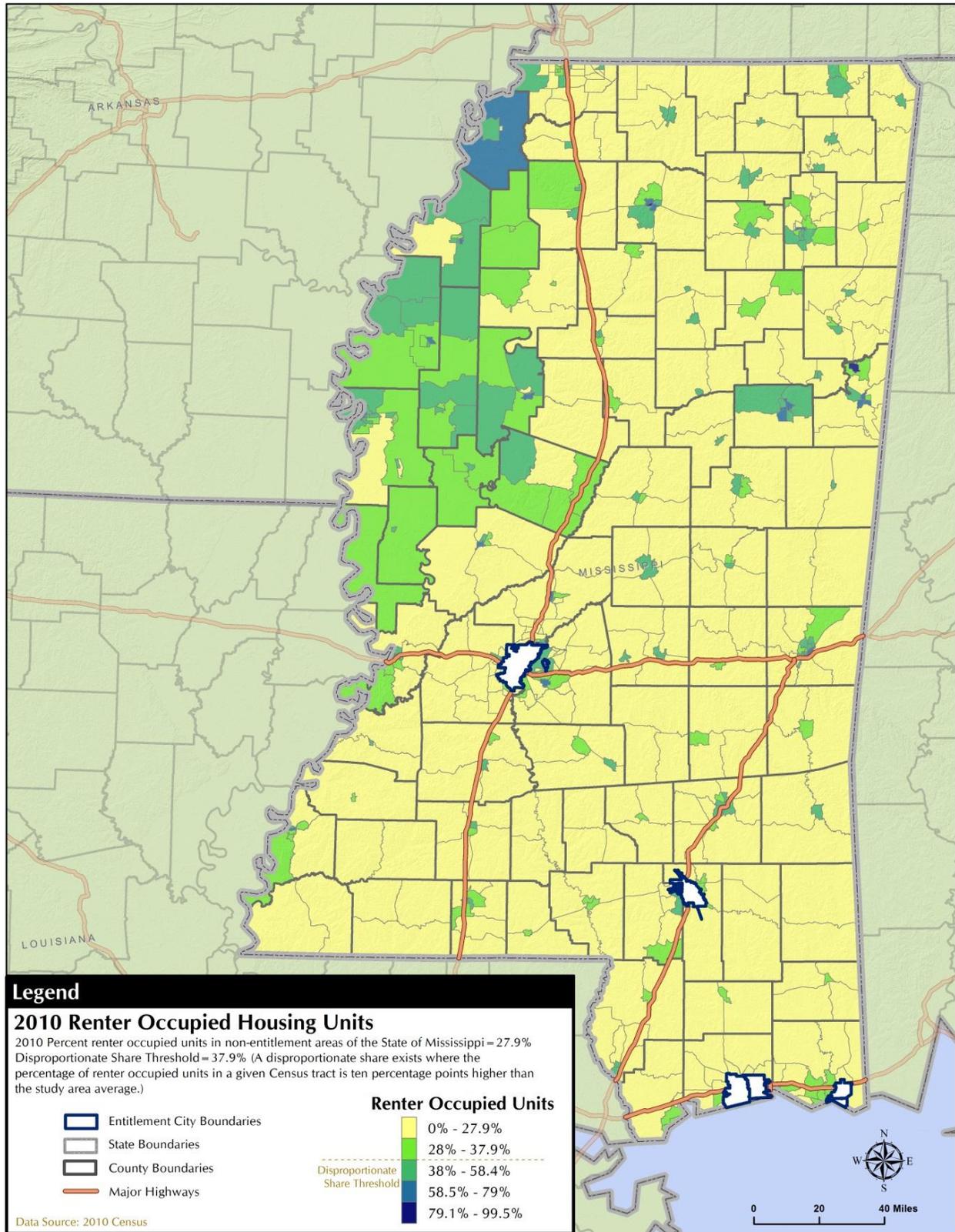
Table II.10
Disposition of Vacant Housing Units
Non-Entitlement Areas of Mississippi
2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00–10
	Units	% of Total	Units	% of Total	
For Rent	21,591	21.8%	32,441	24.2%	50.25%
For Sale	10,641	10.7%	14,274	10.7%	34.14%
Rented or Sold, Not Occupied	8,687	8.8%	5,959	4.4%	-31.40%
For Seasonal, Recreational, or Occasional Use	20,801	21.0%	27,347	20.4%	31.47%
For Migrant Workers	287	0.3%	286	0.2%	-.35%
Other Vacant	36,993	37.4%	53,671	40.1%	45.08%
Total	99,000	100.0%	133,978	100.0%	35.3%

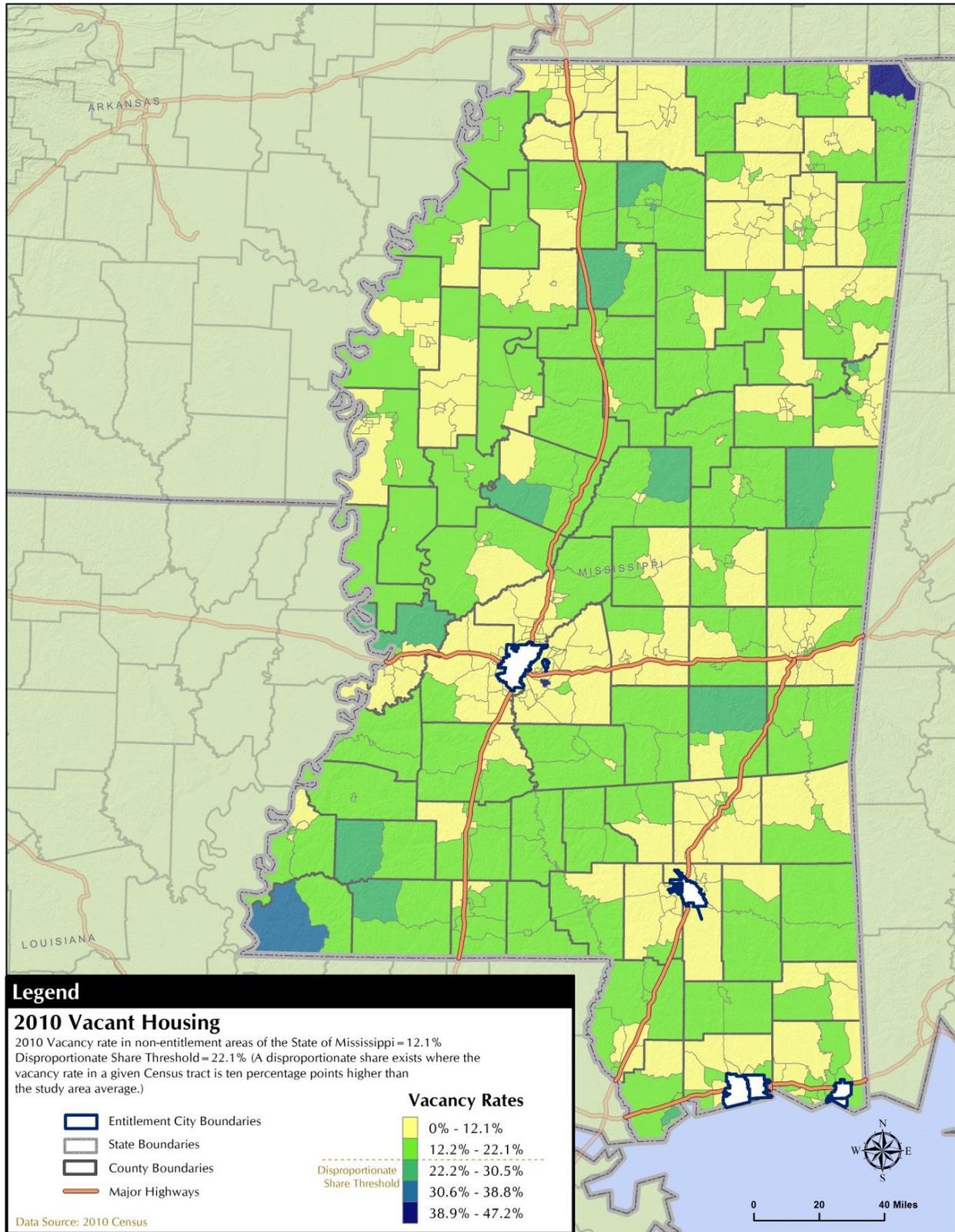
While high numbers of vacant units can be problematic, there are many reasons that housing units may be unoccupied, and vacancies can be temporary. However, units classified as “other vacant” units are a greater cause for concern, as these units are not available to the housing market, and if located in close proximity to each other may represent a blighting influence. On that count, the relatively rapid pace at which these units increased in number between the two Censuses, around 45 percent over the decade, is troubling, and blight is a concern in any areas in which such units were observed to be disproportionately concentrated.

In fact, there were several areas in Mississippi that held disproportionate shares of “other vacant” units in 2010, as shown in Map II.11 on page 53. In that year, an area in which more than 40.1 percent of vacant units were classified as “other vacant” would be said to have an above-average share of such units, and where they appeared in concentrations above 50.1 percent they would be considered to be “disproportionately concentrated”. The highest concentrations of such units appeared largely in rural Census tracts in the east and center of the state, as well as in one tract to the north of Columbus.

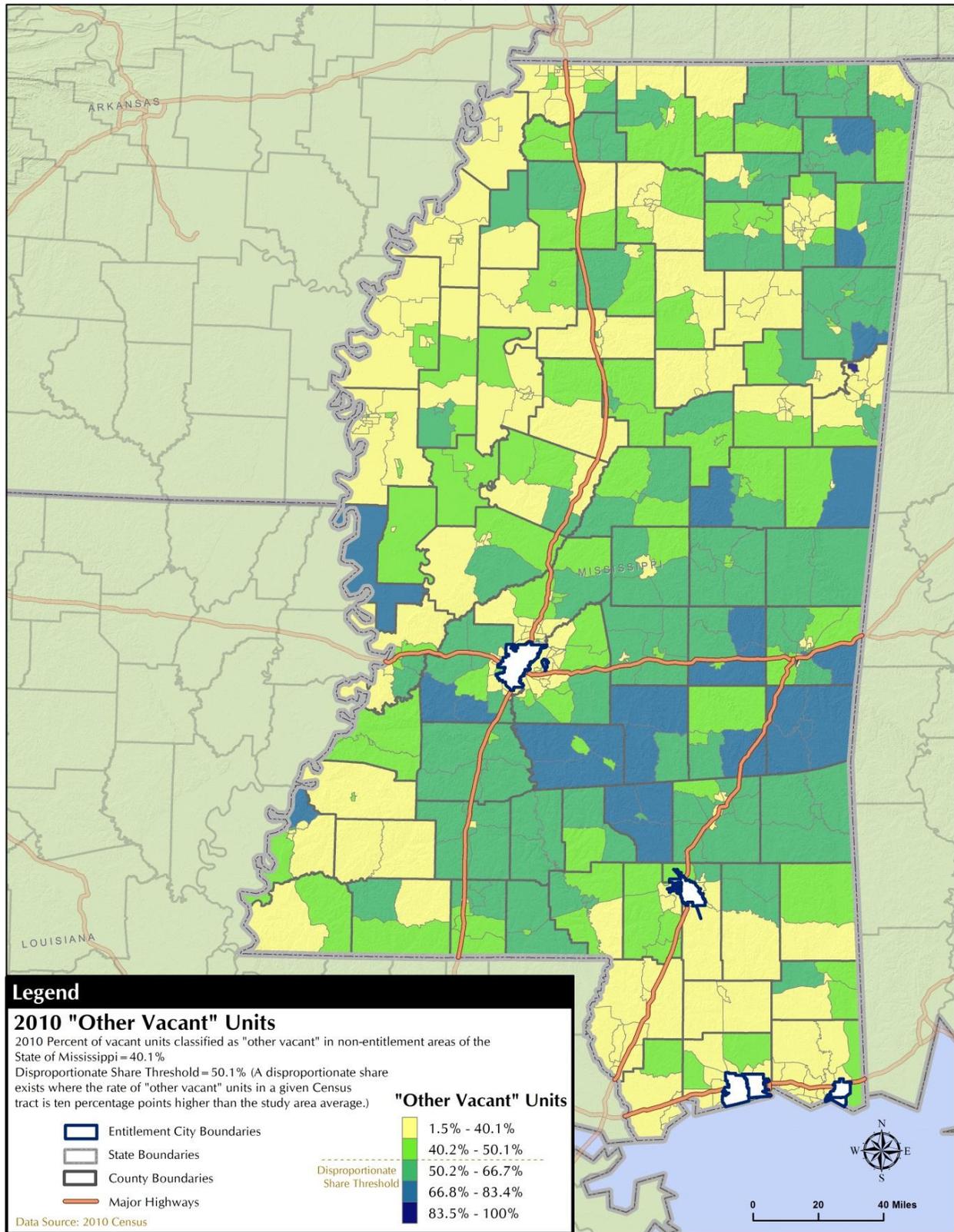
Map II.9
Renter-Occupied Housing Units
 Non-Entitlement Areas of Mississippi
 2010 Census Data



Map II.10
Vacant Housing Units
 Non-Entitlement Areas of Mississippi
 2010 Census Data



Map II.11
“Other Vacant” Housing Units
 Non-Entitlement Areas of Mississippi
 2010 Census Data



HOUSEHOLD SIZE

The size of the average household in Mississippi decreased slightly between 2000 and 2010 as growth in the number of one- and two-person households outpaced growth in households of medium sized households, as shown in Table II.11, below. One-person households increased in number by 16.9 percent, and accounted for more than a quarter of all households in 2010. Two-person households accounted for nearly a third of all households in that year, having increased in number by 11.4 percent since 2000. The number of households with three members increased very slowly, while the number of four-person households fell slightly. Households of these sizes accounted for a smaller share of all households in 2010 than they had in 2000. However, the largest households, or those composed of six or more members, increased in number over the decade.

Table II.11
Households by Household Size
 Non-Entitlement Areas of Mississippi
 2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
One Person	214,817	23.9%	251,060	25.7%	16.9%
Two Persons	282,824	31.5%	314,953	32.3%	11.4%
Three Persons	168,567	18.7%	170,826	17.5%	1.3%
Four Persons	136,490	15.2%	133,853	13.7%	-1.9%
Five Persons	61,022	6.8%	64,341	6.6%	5.4%
Six Persons	21,602	2.4%	24,247	2.5%	12.2%
Seven Persons or More	13,853	1.5%	16,245	1.7%	17.3%
Total	899,175	100.0%	975,525	100.0%	8.5%

Of the 998,154 housing units reported in non-entitlement areas of the State of Mississippi in the 2000 Census, 70.4 percent were single-family homes, as shown in Table II.12, below.⁹ An additional 18.7 percent of units were counted as mobile homes, 5.6 percent as apartment units, 2.8 percent as tri- or four-plex units, and 2.2 percent as duplexes. ACS data for 2012 showed that the share of mobile homes had dropped by over 1.5 percentage points, while the number of single-family units grew by 1.2 percentage points. By comparison, changes in the shares of multiplexes and apartments were relatively minor.

Table II.12
Housing Units by Type
 Non-Entitlement Areas of Mississippi
 2000 Census SF3 & 2012 Five-Year ACS Data

Unit Type	2000 Census		2012 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	702,258	70.4%	793,116	71.6%
Duplex	22,037	2.2%	23,360	2.1%
Tri- or Four-Plex	28,343	2.8%	28,981	2.6%
Apartment	55,754	5.6%	70,331	6.4%
Mobile Home	187,033	18.7%	189,974	17.2%
Boat, RV, Van, Etc.	2,729	0.3%	1,303	0.1%
Total	998,154	100.0%	1,107,065	100.0%

⁹ Summary File 3 (SF3), as defined by the U.S. Census Bureau, “consists of 813 detailed tables of [the 2000 Census’] social, economic, and housing characteristics compiled from a sample of approximately 19 million housing units (about one in six households) that received the 2000 Census long-form questionnaire.” <http://www.census.gov/census2000/sumfile3.html>. These sample data include sampling error and may not sum precisely to the 100 percent sample typically presented in the 2000 Census.

HOUSING PROBLEMS

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

Overcrowding occurs when a housing unit has more than one person per room but less than 1.5 and severe overcrowding occurs in housing units with 1.5 persons per room or more. Fortunately, the share of households that were to some degree overcrowded in non-entitlement areas of the state fell between 2000 and 2012, as shown in Table II.13, below. The share of overcrowded households of all types fell from 4.7 to 2.6 percent during that time, while the share of severely overcrowded households fell from 1.4 to 0.6 percent. In both years, overcrowding was a problem that affected renter-occupied housing units to a greater degree than it affected owner-occupied housing units.

Table II.13
Overcrowding and Severe Overcrowding
 Non-Entitlement Areas of Mississippi
 2000 Census SF3 & 2012 Five-Year ACS Data

Data Source	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
Owner							
2000 Census	651,126	96.5%	17,695	2.6%	6,066	.9%	674,887
2012 Five-Year ACS	676,292	98.3%	9,331	1.4%	2,412	.4%	688,035
Renter							
2000 Census	205,535	91.6%	12,010	5.4%	6,795	3.0%	224,340
2012 Five-Year ACS	248,280	94.9%	9,757	3.7%	3,653	01.4%	261,690
Total							
2000 Census	856,661	95.3%	29,705	3.3%	12,861	1.4%	899,227
2012 Five-Year ACS	924,572	97.4%	19,088	2.0%	6,065	.6%	949,725

Incomplete plumbing or kitchen facilities are other indicators of potential housing problems. According to the Census Bureau, a housing unit is classified as lacking complete plumbing facilities when any of the following are not present: piped hot and cold water, a flush toilet, and a bathtub or shower. 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.

At the time of the 2000 Census, a total of 8,235 units, or 0.9 percent of all housing units in the State, lacked complete plumbing facilities, as shown in Table II.14, on the following page. By 2012, the share of households with incomplete plumbing facilities had fallen to 0.7 percent according to the five-year ACS estimates from that year.

Table II.14
Households with Incomplete Plumbing Facilities

Non-Entitlement Areas of Mississippi
 2000 Census SF3 & 2012 Five-Year ACS Data

Households	2000 Census	2012 Five-Year ACS
With Complete Plumbing Facilities	890,992	943,501
Lacking Complete Plumbing Facilities	8,235	6,224
Total Households	899,227	949,725
Percent Lacking	0.9%	0.7%

The proportion of households with incomplete kitchen facilities was similar to the proportion of households that lacked complete plumbing facilities; however, the percentage of households lacking complete kitchen facilities rose slightly between 2000 and 2012, from 0.7 to 0.9 percent respectively, as shown in Table II.15, below.

Table II.15
Households with Incomplete Kitchen Facilities

Non-Entitlement Areas of Mississippi
 2000 Census SF3 & 2012 Five-Year ACS Data

Households	2000 Census	2012 Five-Year ACS
With Complete Kitchen Facilities	892,557	941,143
Lacking Complete Kitchen Facilities	6,670	8,582
Total Households	899,227	949,725
Percent Lacking	0.7%	0.9%

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

Table II.16, on the following, page shows that 13.5 percent of households were cost burdened and 11 percent were severely cost burdened in 2000. More than 15.3 percent of homeowners with a mortgage had a cost burden and 10.6 were severely cost-burdened in that year, while 16.1 percent of renters had a cost burden and 16.4 percent had a severe cost burden. ACS data averages for 2008 through 2012 showed that the average cost burdens and average severe cost burdens on residents of non-entitlement areas of the State increased to 16 and 13.1 percent, respectively. Home owners with mortgages and renters both experienced an increase in housing costs relative to income, though this increase was more pronounced among renters. By 2012, the share of cost burdened mortgagors had grown to over 19 percent and the share of mortgagors with severe cost burdens had grown to 13.4 percent. Similarly, the share of cost burdened renters grew to 20.7 percent during the same period and the share with severe cost burdens grew to 21.6 percent of all rental households in 2012. A complete version of this table with data for all households is included in Appendix D as Table D.1.

Table II.16
Cost Burden and Severe Cost Burden by Tenure

Non-Entitlement Areas of Mississippi
 2000 Census & 2012 Five-Year ACS Data

Data Source	31%-50%		Above 50%		Total
	Households	% of Total	Households	% of Total	
Owner With a Mortgage					
2000 Census	43,069	15.3%	29,683	10.6%	280,759
2012 Five-Year ACS	70,860	19.0%	49,784	13.4%	372,590
Owner Without a Mortgage					
2000 Census	12,780	7.3%	8,869	5.1%	175,419
2012 Five-Year ACS	27,325	8.7%	18,201	5.8%	315,445
Renter					
2000 Census	35,073	16.1%	35,701	16.4%	217,737
2012 Five-Year ACS	54,210	20.7%	56,557	21.6%	261,690
Total					
2000 Census	90,922	13.5%	74,253	11.0%	673,915
2012 Five-Year ACS	152,395	16.0%	124,542	13.1%	949,725

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

HOUSING COSTS

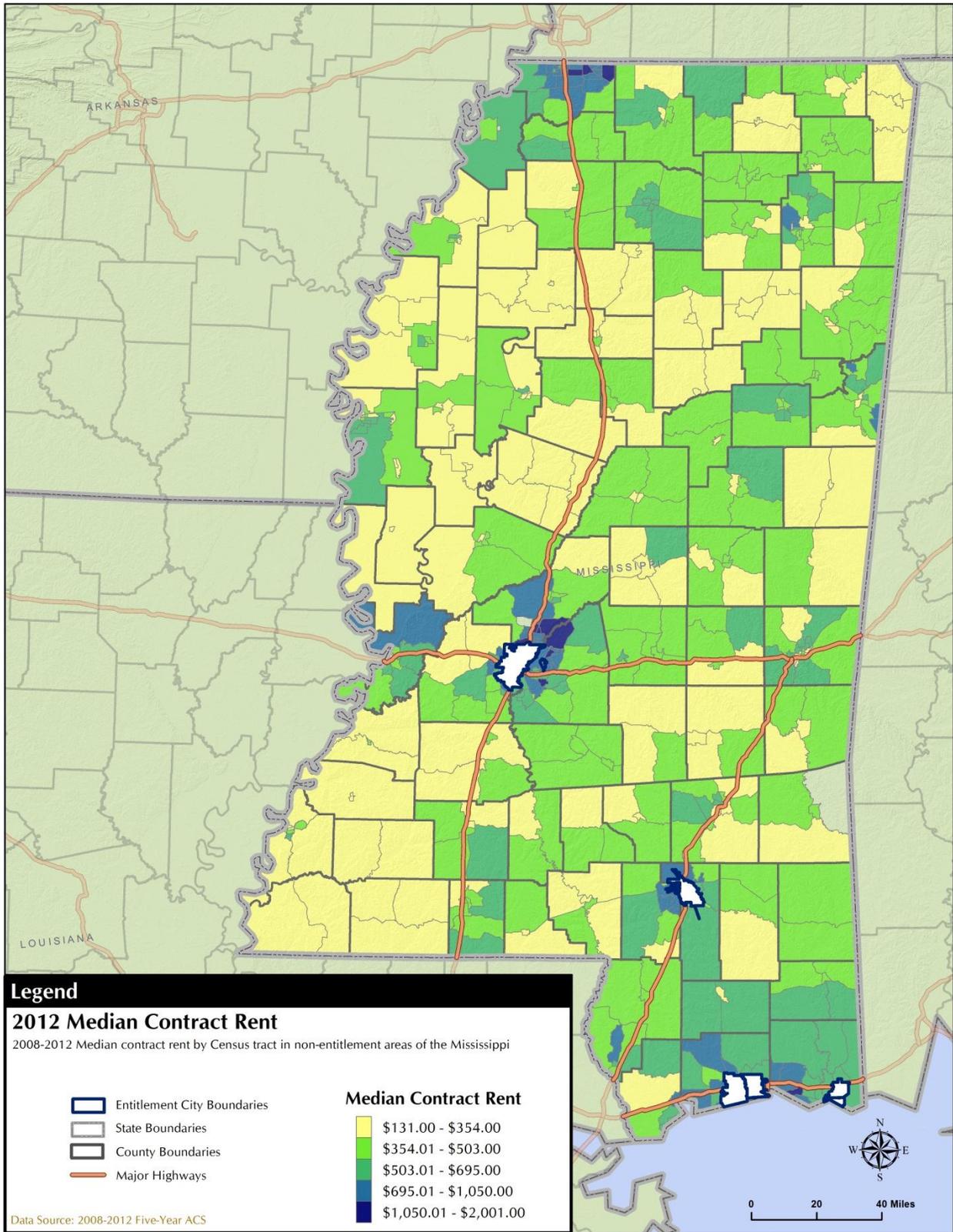
Map II.12, on the following page, illustrates data on median contract rent prices by Census tracts. Relatively high rental costs were observed in Census tracts surrounding major cities of the state, particularly around entitlement cities and in the suburban area to the south of Memphis, Tennessee. In some of those areas, median rental costs ranged from \$1,050.01 and \$2,001.00. By contrast, rental costs were typically low in rural tracts with relatively low population densities.

The distribution of owner-occupied home values in the State of Mississippi, as reported in the 2012 five-year ACS, is presented in Map II.13 on page 59. As with rental households, Census tracts with the highest home values were clustered near major cities, including Jackson, Oxford, Starkville, West Hattiesburg, and the suburban area to the south of Memphis.

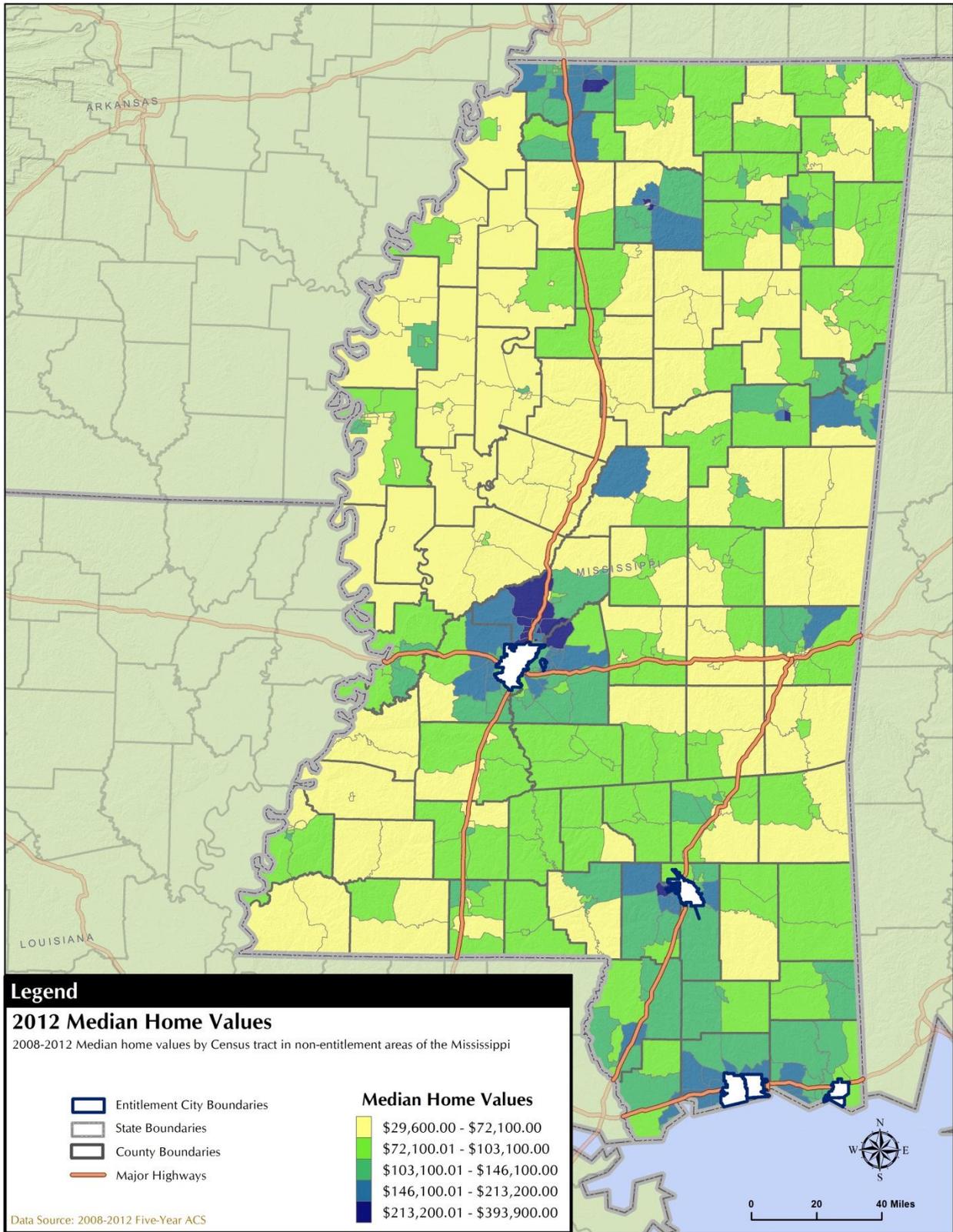
SUMMARY

The population in non-entitlement areas of Mississippi grew by an estimated 6.8 percent between 2000 and 2013 and underwent several minor shifts during that time. In both the 2000 and 2010 Censuses, residents aged 35 to 54 years accounted for the largest share of the population; however, this share slipped by 0.9 percentage points over the decade and these residents represented 27.0 percent of the population in 2010. The two eldest cohorts, comprising residents between the ages of 55 and 64 and those aged 65 and older, grew more rapidly than the overall population between the Censuses. By 2010, these groups together accounted for a quarter of the population.

Map II.12
Median Contract Rent
 Non-Entitlement Areas of Mississippi
 2012 Five-Year ACS Data



Map II.13
Median Home Value
 Non-Entitlement Areas of Mississippi
 2012 Five-Year ACS Data



The racial composition of the state also changed, albeit slightly. White residents accounted for the largest share of residents in both years; though this share slipped by 1.8 percentage points between the two Censuses, white residents still accounted for 62.2 percent of all residents in 2010. By contrast, the Hispanic population more than doubled over the decade, though these residents still only accounted for 2.6 percent of the population in 2010.

Residents with disabilities accounted for 23.6 percent of the population in 2000. In that year, residents with disabilities were disproportionately concentrated in a large Census tract to the east of Jackson. By 2012, 16.5 percent of the population was observed to be living with disabilities, though due to changes in the ACS and Census questionnaires in 2008, it is impossible to conclude with certainty that the share of disabled residents actually declined.

The number of workers employed in non-entitlement areas of Mississippi has fluctuated considerably since 2000, when the number of employed persons peaked at over 1,072,000. The number of employed workers dropped by nearly 50,000 in 2009, though it began to steadily increase after that year. Employment fell again in 2013, though because the size of the labor force contracted along with it, the unemployment rate continued to decline. As had been the case in the labor market, the unemployment rate fluctuated considerably after 2000. Rapid growth in the unemployment rate continued through 2010, but began to fall after that year, and has continued to fall through 2013. The labor market decline of the late 2000s was also reflected in a drop in the number of full- and part-time jobs in the state, which continued through 2010.

In contrast to trends in the labor market, the amount that the average resident earned at his or her jobs grew steadily through the 1990s in real dollars. However, growth in earnings largely stopped after 2004 and held steady at around \$41,000 per year for approximately 6 years. However, in 2012 earnings ticked up to \$42,812. Growth in real per capita income has been even steadier over the same period, and has uniformly positive since 1982, with the exception of a brief decline in 2009. Accordingly, household incomes rose between 2000 and 2012 as the share of households in all income groups below \$50,000 per year fell and the share of households in higher income groups rose. In spite of this shift in household incomes, the poverty rate rose by 2 percentage points between 2000 and 2012.

The composition of the housing stock in non-entitlement areas also shifted as growth in the number of housing units outpaced growth in the population. Though the number of occupied housing units increased by 8.5 percent these units declined as a share of the overall housing stock as the number of vacant units grew by 35.3 percent. There was a shift toward rental tenancy over the decade as the share of renter-occupied units grew over the share of owner-occupied units. Growth in the number of vacant units for rent accounted for a substantial portion of the increase in vacant units overall, along with the considerable growth in the number of “other vacant” units.

The average household size in non-entitlement areas of Mississippi appears to have changed very little between the 2000 and 2010 Censuses. However, there was marked shift away from medium sized households and toward larger and smaller households over the period. In addition, the shares of single-family units and apartments grew between 2000 and 2012, while the share of mobile homes and multiplexes fell. Fewer housing units were overcrowded by

2012, and fewer units had incomplete plumbing facilities. However, the share of units lacking complete kitchen facilities grew from 0.7 to 0.9 percent between 2000 and 2012.

Five-Year ACS estimates from 2012 indicate that tracts with relatively high median contract rent prices tended to be clustered around urban areas of the state; including Jackson and the coastal cities, as well as in the part of the Memphis, Tennessee suburbs that fell within the Mississippi border. Tracts with relatively high median home values tended to be concentrated in these same areas, as well as in Census tracts in and around Oxford and Starkville.

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).¹⁰

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, 1991.¹¹

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.

¹⁰ "HUD Fair Housing Laws and Presidential Executive Orders."

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

¹¹ "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.¹²

STATE AND LOCAL FAIR HOUSING LAWS

The Mississippi Code of 1972 Unannotated does not include any protections against discrimination in housing choice, though there are several articles that prohibit discrimination in specific settings and situations.

FAIR HOUSING STUDIES

NATIONAL FAIR HOUSING STUDIES

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

1. Phase 1 – Black and Hispanic Populations

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

2. Phase 2 – Asian and Pacific Islander Populations

This study, conducted in 2000 and 2001 and based on 889 paired tests in 11 metropolitan areas in the U.S., showed that Asian and Pacific Islander individuals who sought to rent a unit experienced adverse treatment compared to white individuals in 21.5 percent of tests, which was similar to the rate black and Hispanic individuals saw. The study also showed that Asian and Pacific Islander prospective homebuyers

¹²“HUD Fair Housing Laws and Presidential Executive Orders.”

experienced adverse treatment compared to white prospective homebuyers 20.4 percent of the time, with discrimination occurring in the availability of housing, inspections, assistance with financing, and encouragement by agents.

3. Phase 3 – American Indian Population

The last phase of HUD’s nationwide effort to measure housing discrimination involved estimating the level of discrimination experienced by American Indian individuals in their search for housing in metropolitan areas across Minnesota, Montana, and Mississippi. The findings showed that the American Indian population experienced adverse treatments compared to white individuals in 28.5 percent of rental tests. White individuals were consistently told about advertised units, similar units, and more units than American Indian individuals with similar qualifications. The high level of discrimination experienced by the American Indian population in these areas surpassed rates seen by Hispanic, black, and Asian individuals in the metropolitan rental markets nationwide.¹³

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

As a follow-up, HUD later released a study in February 2006 called *Do We Know More Now?: Trends in Public Knowledge, Support and Use of Fair Housing Law*. One aim of the study was to determine whether a nationwide media campaign had proven effective in increasing the public’s awareness of housing discrimination, and another goal was to determine the public’s desire to report such discrimination. Unfortunately, the study found that overall public knowledge of fair housing law did not improve between 2000 and 2005. As before, just half of the public knew the law regarding six or more illegal housing activities. The report showed that 17 percent of the study’s adult participants experienced discrimination when seeking housing; however, after reviewing descriptions of the perceived discrimination, it was determined that only about 8 percent of the situations might be covered by the Fair Housing Act. Four out of five individuals who felt they had been discriminated against did not file a fair housing complaint, indicating that they felt it “wasn’t worth it” or that it “wouldn’t have helped.” Others did not know where to complain, assumed it would cost too much, were too busy, or feared retaliation. One positive finding of the survey was that public support for fair housing law increased from 66 percent in 2000 to 73 percent in 2005.¹⁵

¹³ “Discrimination in Metropolitan Housing Markets: National Results from Phase 1, Phase 2, and Phase 3 of the Housing Discrimination Study (HDS).” <http://www.huduser.org/portal/publications/hsgfin/hds.html>

¹⁴ U.S. Department of Housing and Urban Development, Office of Policy Development and Research. *How Much Do We Know?: Public Awareness of the Nation’s Fair Housing Laws*. April 2002. <http://www.huduser.org/portal/publications/fairhsg/hmwk.html>

¹⁵ U.S. Department of Housing and Urban Development, Office of Policy Development and Research. *Do We Know More Now?: Trends in Public Knowledge, Support and Use of Fair Housing Law*. February 2006. <http://www.huduser.org/portal/publications/hsgfin/FairHsngSurvey.html>

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

- The number of fair housing complaints filed each year steadily increased since 1998. An increasing proportion of grievances alleged discrimination based on disability and a declining proportion alleged discrimination based on race, although race was still the most cited basis of housing discrimination;
- FHAP agencies conducted more fair housing investigations than Fair Housing and Equal Opportunity (FHEO) agencies over the eight-year period. The total number of investigations completed each year increased slightly after declining in 1997 and 1998; and
- Over this time period, an increasing percentage of investigations closed without finding reasonable cause to believe discrimination occurred. However, a declining percentage of investigations were resolved by the parties themselves or with help from FHEO or FHAP agencies.¹⁶

In 2006, the University of Southern California and Oregon State University collaborated to study rental discrimination and race. The universities responded to 1,115 advertisements regarding apartment vacancies in Los Angeles State and signed the bottom of each email with Tyrell Jackson, a traditionally black name; Patrick McDougall, a traditionally white name; or Said Al-Rahman, a traditionally Arab name. Analysis indicated that individuals who were perceived as black were four times more likely to be discouraged from viewing an apartment than persons perceived as white, and individuals considered to be Arab were three times more likely to be discouraged from viewing an apartment than individuals who appeared white. The analysis also noted that applicants perceived as black were more likely to receive negative responses, such as the apartment was no longer available for market rate or above market rate apartments. For example, only an email signed Tyrell Jackson received a reply that reiterated the apartment cost to ensure the apartment was within the applicant's price range. The study also analyzed the responses from private property owners versus corporate property owners, but found no statistical difference in the way the two groups responded to applicants of different races.¹⁷

Released by the Poverty & Race Research Action Council in January 2008, *Residential Segregation and Housing Discrimination in the United States* asserts that many current governmental efforts to further fair housing actually result in furthering unfair housing practices across the U.S. This article suggests that fair housing efforts can cause residential segregation. For example, if the majority of public housing residents are non-white and most public housing accommodations are grouped in the same Census tracts, residential segregation is resultant.

¹⁶ U.S. General Accounting Office. "Fair Housing: Opportunities to Improve HUD's Oversight and Management of the Enforcement Process." April 2004. <http://gao.gov/products/GAO-04-463>

¹⁷ Carpusor, Adrian and William Loges. "Rental Discrimination and Ethnicity in Names." *Journal of Applied Social Psychology* 36(4).

Similarly, many Section 8 voucher holders are racial or ethnic minorities, and most housing that accepts Section 8 vouchers is grouped in selected areas, which again results in residential segregation. The report offers recommendations to curb such residential segregation, including dispersing public housing developments throughout cities and communities and providing greater incentives for landlords with several properties to accept the vouchers.¹⁸

Published in 2009 by the National Fair Housing Alliance, *For Rent: No Kids!: How Internet Housing Advertisements Perpetuate Discrimination* presented research on the prevalence of discriminatory housing advertisements on popular websites such as Craigslist. According to the article, while newspapers are prohibited from publishing discriminatory housing advertisements, no such law exists for websites like Craigslist, as they are considered interactive internet providers rather than publishers of content. As such, they are not held to the same legal standards as newspapers. While individual landlords who post discriminatory advertisements may be held responsible, there are no such standards for companies like Craigslist that post the discriminatory advertisements. Newspapers and other publishers of content are required to screen the advertisements they accept for publishing for content that could be seen as discriminatory. This may include phrases like “no children” or “Christian only,” which violate provisions of the Fair Housing Act that state families with children and religious individuals are federally protected groups.¹⁹

In May 2010, the National Fair Housing Alliance published a fair housing trends report, *A Step in the Right Direction*, which indicated that recent years have demonstrated forward movement in furthering fair housing. The report began with a commendation of HUD’s federal enforcement of fair housing law and noted the agency’s willingness to challenge local jurisdictions that failed to affirmatively further fair housing. In response to the recent foreclosure crisis, many credit institutions have implemented tactics to reduce risk. However, this report suggests that policies that tighten credit markets, such as requiring larger cash reserves, higher down payments, and better credit scores, may disproportionately affect lending options for communities of color and women. *A Step in the Right Direction* concludes with examples of ways in which the fair housing situation could be further improved, including addressing discriminatory internet advertisements and adding gender identity, sexual orientation, and source of income as federally protected classes.²⁰

The positive note that the NFHA struck in its 2010 report carried over into the following year’s *The Big Picture: How Fair Housing Organizations Challenge Systemic and Institutionalized Discrimination*, published by the Alliance in April of 2011. This report began by noting an encouraging downward trend in the proportion of individuals in large metropolitan areas living in segregation, which had dropped from 69 to 65 percent between 2000 and 2010, according to census data from 2010. The report also highlighted the work of fair housing organizations to combat systemic and institutionalized discrimination produced by exclusionary zoning, NIMBYism, the dual credit market, and other fair housing challenges, often on limited budgets

¹⁸ U.S. Housing Scholars and Research and Advocacy Organizations. *Residential Segregation and Housing Discrimination in the United States*. January 2008. http://prrac.org/pdf/FinalCERD_HousingDiscriminationReport.pdf

¹⁹ National Fair Housing Alliance. *For Rent: No Kids!: How Internet Housing Advertisements Perpetuate Discrimination*. August 2009. <http://www.nationalfairhousing.org/LinkClick.aspx?fileticket=zgbukJP2rMM%3D&tabid=2510&mid=8347>

²⁰ National Fair Housing Alliance. *A Step in the Right Direction: 2010 Fair Housing Trends Report*. May 2010. <http://www.nationalfairhousing.org/Portals/33/Fair%20Housing%20Trends%20Report%202010.pdf>

and with limited personnel. The NFHA closed its 2011 report by praising the work of private fair housing organizations while underscoring the need for continued work.²¹

The 2012 report from the NFHA focused on issues of fair housing in the context of the shifting demographic composition of the United States, where the white population is projected to no longer represent a majority of residents within thirty years. The report discussed encouraging signals from HUD and the Justice Department, who have “increased their efforts and announced landmark cases of mortgage lending, zoning, and other issues that get to the heart of the [Fair Housing] Act: promoting diverse and inclusive communities²².” The report also highlights a new arena for discrimination in housing, which has emerged as a result of the massive level of foreclosures in the country in recent years: uneven maintenance of Real Estate Owned (REO) properties in white and minority areas. In concluding, the report hails the creation of the Consumer Financial Protection Bureau as a new ally for fair housing and equal opportunity.²³

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

FAIR HOUSING CASES

NATIONAL FAIR HOUSING CASES

As noted in the introduction to this report, provisions to affirmatively further fair housing are long-standing components of HUD’s Housing and Community Development programs. In fact, in 1970, *Shannon v. HUD* challenged the development of a subsidized low-income housing project in an urban renewal area of Philadelphia that was racially and economically integrated. Under the Fair Housing Act, federal funding for housing must further integrate community development as part of furthering fair housing, but the plaintiffs in the Shannon case claimed that the development would create segregation and destroy the existing balance of the neighborhood. As a result of the case, HUD was required to develop a system to consider the racial and socio-economic impacts of their projects.²⁴ 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

²¹ *The Big Picture: How Fair Housing Organizations Challenge Systemic and Institutionalized Discrimination*. National Fair Housing Alliance 2011 Fair Housing Trends Report. 29 April 2011.

<http://www.nationalfairhousing.org/LinkClick.aspx?fileticket=SbZH3pTEZhs%3d&tabid=3917&mid=5321>

²² <http://www.nationalfairhousing.org/LinkClick.aspx?fileticket=GBv0ZVJp6Gg%3d&tabid=3917&mid=5321>

²³ *Ibid.*

²⁴ U.S. HUD. *39 Steps Toward Fair Housing*. <http://www.hud.gov/offices/ftheo/39steps.pdf>

authorities.²⁵ The Shannon case gave entitlement jurisdictions the responsibility of considering the segregation effects of publicly-funded housing projects on their communities as they affirmatively further fair housing.

More recently, in a landmark fraud case, Westchester County, New York, was ordered to pay more than \$50 million to resolve allegations of misusing federal funds for public housing projects and falsely claiming their certification of furthering fair housing. The lawsuit, which was filed in 2007 by an anti-discrimination center, alleged that the County failed to reduce racial segregation of public housing projects in larger cities within the County and to provide affordable housing options in its suburbs. The County had accepted more than \$50 million from HUD between 2000 and 2006 with promises of addressing these problems. In a summary judgment in February 2009, a judge ruled that the County did not properly factor in race as an impediment to fair housing and that the County did not accurately represent its efforts of integration in its AI. In the settlement, Westchester County was forced to pay more than \$30 million to the federal government, with roughly \$20 million eligible to return to the County to aid in public housing projects. The County was also ordered set aside \$20 million to build public housing units in suburbs and areas with mostly white populations, and to promote legislation “currently before the Board of Legislators to ban ‘source-of-income’ discrimination in housing (§33(g))”.²⁶

In complying with the latter requirement, the County Executive’s actions were limited to sending five letters to various fair housing advocates, encouraging them to continue their advocacy, and one letter to the Board of Legislators expressing support for the legislation. This bill failed to pass during the 2009 legislative session, and a similar bill was taken up during the 2010 session. In the meantime, Westchester voters elected Rob Astorino to the position of County Executive. Astorino declined to promote the source-of-income legislation before the Board, and when a weakened version of the bill passed in early 2010, he vetoed it. Finding that Westchester had failed to affirmatively further fair housing in the manner agreed upon in the earlier settlement, HUD rejected the County’s AFFH certification and discontinued federal funding. As of April 2013, HUD’s decision had been upheld through several rounds of appeals by the County²⁷. The ramifications of this case are expected to affect housing policies of both states and entitlement communities across the nation; activities taken to affirmatively further fair housing will likely be held to higher levels of scrutiny to ensure that federal funds are being spent to promote fair housing and affirmatively further fair housing.

In 2008, \$3 billion of federal disaster aid was allotted to the Texas state government to provide relief from damage caused by hurricanes Ike and Dolly. These storms ravaged homes in coastal communities, many of which were owned by low-income families that could not afford to rebuild. However, instead of directing the federal funds to the areas most affected by the storms, the State spread funds across Texas and let local planning agencies spend at will. In reaction to this, two fair housing agencies in the state filed a complaint with HUD stating that the plan violated fair housing laws as well as federal aid requirements that specify half of the funds be directed to lower-income persons. In light of the complaint, HUD withheld \$1.7 billion in CDBG funds until the case was resolved. A settlement was reached in June 2010; the

²⁵ Orfield, Myron. “Racial Integration and Community Revitalization: Applying the Fair Housing Act to the Low Income Housing Tax Credit.” *Vanderbilt Law Review*, November 2005.

²⁶ <http://www.hud.gov/content/releases/settlement-westchester.pdf>

²⁷ *United States v Westchester State* 712 F.3d 761 2013 U.S. App.

State was required to redirect 55 percent of the amount of the original funds to aid poorer families that lost their homes. The State was also asked to rebuild public housing units that were destroyed by the storms and to offer programs that aid minority and low-income residents in relocating to less storm-prone areas or areas with greater economic opportunities.²⁸

In a recent audit of rental properties in the Dallas-Fort Worth area, the North Texas Fair Housing Center (NTFHC) measured the nature and extent of discrimination based on race and familial status in the North Texas region. The NTFHC discussed the findings of this study in a report published in 2011. According to the report, prospective African-American renters in the Dallas-Fort Worth metroplex can “expect to encounter discrimination in 37 percent of their housing searches”, while Hispanic renters will discriminate housing discrimination in 33 percent of housing searches, and families with children will face discrimination in 20 percent of housing searches. Although the study relied on limited sample sizes (particularly in testing for discrimination against Hispanic applicants and those with children), the findings suggest that housing discrimination is a live issue in the Dallas-Fort Worth area.²⁹

LOCAL FAIR HOUSING CASES

Recent U.S. Department of Justice Cases

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

- Where there is reason to believe that a person or entity is engaged in what is termed a “pattern or practice” of discrimination or where a denial of rights to a group of people raises an issue of general public importance;
- Where force or threat of force is used to deny or interfere with fair housing rights; and
- Where persons who believe that they have been victims of an illegal housing practice file a complaint with HUD or file their own lawsuit in federal or state court.³⁰

The Department of Justice has filed six complaints against housing providers in the State of Mississippi in the last five years (though some of these complaints concern alleged discriminatory actions that occurred more than five years ago). Three of these complaints included allegations that the housing provider (“defendant”) discriminated against the plaintiff on the basis of familial status, two complaints cited discrimination on the basis of disability, and one complaint cited racial discrimination. A brief summary of each of these cases is provided below.

United States v. Bryan Company

In May 2011, the Department of Justice files a lawsuit against a group of housing owners, developers, and designers who had been involved in the construction of 2,000 apartment units

²⁸ <http://www.reلمانlaw.com/docs/FinalConciliationAgreementTexas.pdf>

²⁹ Rental Audit: Dallas-Fort Worth Metroplex. North Texas Fair Housing Center. April 2011.

http://www.northtexasfairhousing.org/86bfb8ffc7_sites/www.northtexasfairhousing.org/files/2011_NTFHC_Rental_Audit_Report_FINAL.pdf

³⁰ “The Fair Housing Act.” The United States Department of Justice. http://www.justice.gov/crt/about/hce/housing_coverage.php

in multi-family housing complexes in Mississippi, Louisiana, and Tennessee. Included in these multi-family complexes were 800 ground floor units that are required by the federal Fair Housing Act to include accessible features. In spite of this requirement, the DOJ alleged, the apartment units were inaccessible to persons with disabilities, owing to a lack of accessible pedestrian routes, parking spaces, doorways, paths through apartment units, light switches, kitchens, and bathrooms, among other features. In addition, the units were observed to have steep cross and running slopes. The leasing offices were also alleged to be inaccessible.³¹

The case against Bryan Company was finally settled in February 2014. The terms of the settlement require that the company make “extensive retrofits” to the properties to bring them into compliance with federal accessibility requirements. In addition, in an earlier partial settlement associated with the same lawsuit, nine architects and civil engineers who were involved with the project were required to pay \$60,000 in compensation to those who had been harmed by the inaccessible conditions of the property.³²

United States v. Dawn Properties, Inc.

In May of this year, the Justice Department filed a complaint against Dawn Properties, a Mississippi-based developer. In the complaint, the DOJ alleged that the developer failed to design and build five new multi-family complexes in conformance with accessibility requirements included in the FHA and American’s with Disabilities Act (ADA). As had been the case in *United States v. Bryan Company*, these multifamily complexes lack accessible entrances and sufficient maneuvering space for residents who use a wheelchair, according to the allegations, and have steep pedestrian paths and light switches and other environmental controls that are excessively high.

In filing the suit, the DOJ is seeking a court order that will require the defendant to any properties that they have designed and constructed since 1991 into compliance with the FHA and ADA.³³ The suit also seeks monetary damages for those who have been harmed by the developer’s alleged failure to include accessible features in the design and construction of those five properties.

United States v. Kelly

The United States filed a complaint against defendant Kelly, the onsite property manager of Shamrock Apartments in Vicksburg, in November 2010. In the complaint, the Justice Department alleges that the defendant discriminated against the plaintiff, a white woman and mother of a biracial daughter, on the basis of race. According to the DOJ, the discriminatory behavior began after the defendant met the plaintiff’s daughter and subsequently asked another white tenant to let her know if the plaintiff had any black visitors. On several occasions thereafter, the plaintiff had a visitor at her apartment who was black. Following one of these visits, she was informed by the defendant that neighbors had complained about her visitor, and

³¹ Justice News. “Justice Department Files Lawsuit Alleging Disability-Based Housing Discrimination at Nine Apartment Complexes in Three States.” Department of Justice Website. 18 July 2014. <<http://www.justice.gov/opa/pr/2011/May/11-ag-646.html>>

³² Justice News. “Justice Department Resolves Lawsuit Alleging Disability-Based Discrimination at Nine Apartment Complexes in Three States.” Department of Justice Website. 18 July 2014. <<http://www.justice.gov/opa/pr/2014/February/14-crt-196.html>>

³³ Justice News. “Justice Department Files Lawsuit Alleging Disability-Based Discrimination by Mississippi Developer.” Department of Justice Website. 18 July 2014. <<http://www.justice.gov/opa/pr/2014/May/14-crt-560.html>>

that she was not allowed to have visitors who were not listed on her lease; a prohibition that appeared to apply uniquely to the plaintiff. On another occasion, the same visitor arrived at her apartment early in the morning and knocked on the plaintiff's door. Neighbors of the plaintiff called the police, and the next day the defendant informed her that she was going to be evicted due to the visit from the police the night before. By contrast, another tenant, who was white, had been visited by the police without receiving an eviction notice.³⁴

When her lease was not renewed, the plaintiff filed a complaint with HUD, who referred the matter to the Department of Justice following an investigation of the claim. The Justice Department and defendant settled the complaint in March 2012. As a condition of the settlement, the defendant was required to refrain from further discriminatory acts, adopt a non-discrimination policy and post a fair housing poster at the residents, pay the plaintiff and her daughter \$17,500 in monetary damages, and undergo training in fair housing and non-discrimination policy.

United States v. Magee

On April 17, 2013, the Department of Justice settled a case against a property owner and his affiliates ("defendants") in Magee who had been accused of discrimination on the basis of familial status.³⁵ According to the original complaint, which was filed on November 17, 2011, the defendants informed the complainant, a woman with four children, that she could not rent a three bedroom home that was available for lease because she had "too many children". The defendants, who owned the home in question along with several others, had established an occupancy policy that limited three-bedroom homes to three children; they informed the complainant that they had a four-bedroom home that she could rent. The complainant filed a fair housing complaint with HUD in March of 2011.³⁶

During the course of its investigation, HUD attempted to help the parties conciliate the complaint without success. After an investigation, the agency determined that there was reasonable cause to believe that discrimination had occurred, and the referred the matter to the Attorney General in accordance with the decision of the parties.³⁷ The case was settled in April of last year, and as a condition of the settlement the defendants are required to forebear from any further discriminatory acts, provide a public notice of non-discriminatory policies, undergo mandatory training, keep records and make reports detailing their compliance with the terms of the settlement, and to pay a total of \$27,000 in damages and civil penalties.³⁸

United States v. Mercker

In May 2006, a family of two adults and five children moved from a two bedroom apartment into a three bedroom single family home in Gulfport, Mississippi. As they were moving in, the owner of the home ("defendant") arrived to perform an announced inspection of recent repairs that had been made to the units. Having seen the family unpacking, the owner subsequently instructed the property manager to "get those people out because they [are] gonna tear up my

³⁴ *United States v. Kelly* (2010).

³⁵ Housing and Civil Enforcement Cases. "Case Summaries". Department of Justice Website. 23 July 2014. <<http://www.justice.gov/crt/about/hce/documents/casesummary.php#magee>>

³⁶ *United States v. Magee* (2011).

³⁷ *Ibid.*

³⁸ *United States v. Magee* (2013).

house³⁹.” The defendant claimed that the family size exceeded the occupancy policy for the unit, though this policy had not been articulated in writing and was more restrictive than local occupancy standards.⁴⁰ The family filed a fair housing complaint with HUD in September 2006, and after an investigation HUD found that there was reasonable cause to believe that discrimination had occurred, and referred the matter to the Attorney General.

The court entered a consent decree in this case on April 11, 2012, the same day that the case was filed with the federal court. As a condition of the settlement, the defendant is required to allow the maximum number of occupants permitted under local occupancy codes, notify applicants that all units are available for rent on a non-discriminatory basis, undergo mandatory training, keep records and make reports detailing their compliance with the terms of the settlement, and pay the complainants \$6,000 in damages resulting from the alleged denial of their rights under the Fair Housing Act.⁴¹

United States v. Penny Pincher, Inc.

In January 2009, a Mississippi resident (“complainant”) with a husband and three children filed two complaints with HUD; one against a housing provider in Biloxi who had advertised a home available for rent to individuals or couples without children and the other against the weekly newspaper, the Penny Pincher, that had run the advertisements. The complainant reported one of the advertisements to the Gulf Coast Fair Housing Center, who sent a tester to inquire about the property. In a conversation with the tester, the housing providers made other comments indicating their unwillingness to rent the home to a family with children, according to the HUD complaint.⁴² Having conducted an investigation and attempted to help the parties reach conciliation on the matter without success, HUD found that there was reasonable cause to believe that housing discrimination had occurred and referred the matter to the Attorney General.

The Department of Justice settled the complaint with Penny Pincher in August 2011. As a condition of the settlement, the newspaper was enjoined from publishing discriminatory advertising and required to adopt and publish a non-discrimination policy, to undergo mandatory training, and to pay \$10,000 in damages to the Gulf Coast Fair Housing Center, and \$1,500 to the woman who reported the advertisement to the Center, among other requirements.⁴³ The Department of Justice settled its complaint with the property owners, the other defendants in the case, in December of 2011. The terms of this settlement were similar to the terms of the settlement with Penny Pincher; as monetary relief, the owners were required to pay \$2,000 to the newspaper and \$500 to the woman who had reported the discriminatory advertisement.⁴⁴

³⁹ *United States v. Mercker* (2011). Complaint, 3.

⁴⁰ *Ibid.*

⁴¹ *United States v. Mercker* (2011). Consent Decree.

⁴² *United States v. Penny Pincher* (2010).

⁴³ *United States v. Penny Pincher* (Aug. 2011).

⁴⁴ *United States v. Penny Pincher* (Dec. 2011).

SUMMARY

Mississippi residents are protected from discrimination in the housing market by the Federal Fair Housing Act, which recognizes race, color, national origin, religion, sex, familial status, and disability as protected classes. In spite of these protections, national fair housing studies demonstrated the persistence of illegal discrimination in the housing market, though they also suggest that discrimination has become more subtle and difficult to identify.

The Department of Justice has lodged six complaints against housing providers in the State of Mississippi in the last five years. In three of these complaints, housing providers were alleged to have discriminated against Mississippi residents on the basis of familial status. Two complaints included allegations of discrimination on the basis of disability, and one complaint cited alleged racial discrimination.

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 Mississippi based on a number of factors, including an enumeration of key agencies and organizations that contribute to affirmatively furthering fair housing, evaluation of the presence and scope of services of existing fair housing organizations, and a review of the complaint process.

FAIR HOUSING AGENCIES

FEDERAL AGENCIES

U.S. Department of Housing and Urban Development

The U.S. Department of Housing and Urban Development (HUD) oversees, administers, and enforces the federal Fair Housing Act. HUD's regional office in Fort Worth oversees housing, community development, and fair housing enforcement in Arkansas, Louisiana, Mississippi, Oklahoma, and Texas. Contact information for HUD is listed below⁴⁵:

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 for Mississippi 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

Toll Free: (800) 225-5342

TTY: (404) 730-2654

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

The Office of Fair Housing and Equal Opportunity (FHEO) within 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 Mississippi. 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 makes a *prima facie* determination on the substantial equivalency of a state or local law to the federal Fair Housing Act. Once this determination has been made, and the law has been judged to be substantially equivalent, the agency enforcing the law is certified on an interim basis for a period of three years. During those three years, the local enforcement organization “builds its capacity to operate as a fully certified substantially equivalent agency.” 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 as a substantially equivalent agency for five years.

HUD will typically refer most complaints of housing discrimination to a substantially equivalent state or local 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. There are no FHAP grantees in the State of Mississippi.

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 initiatives⁴⁶: 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:

⁴⁶ Though there are four initiatives included in the FHIP, no funds are currently available through the Administrative Enforcement Initiative.

- **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.

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.

There have been several FHIP grantees operating in the State of Mississippi in various years since 2011. In 2011, the University of Southern Mississippi and Gulf Coast Fair Housing Center⁴⁷ both received \$125,000 in FHIP funding through the EOI. In 2012, the Gulf Coast Fair Housing Center also received \$325,000 in FHIP funding through the FHOI, though the Fair Housing Center was not included among FHIP grantees the following year. In 2013, HUD granted \$125,000 in continuing development funding to the Mississippi Center for Justice. This funding is being used to increase the Center’s capacity for fair housing enforcement.

STATE AGENCIES

At present there are no governmental agencies at the state level that accept or investigate complaints of unlawful discrimination on behalf of Mississippi residents.

PRIVATE ORGANIZATION

The Mississippi Center for Justice, a public interest law firm, serves residents of Mississippi who believe that they have been subjected to unlawful discrimination in fair housing choice, in addition to working to “promote educational opportunity, protect the rights of consumers, secure access to healthcare, ensure equity in disaster recovery, and put affordable housing

⁴⁷ In 2011, the Gulf Coast Fair Housing Center was referred to as the “Fair Housing Center for the Gulf Coast Region of Mississippi.”

within reach of all Mississippians⁴⁸." A FHIP grantee, the Center for Justice accepts complaints from Mississippi residents who believe that they have been subjected to unlawful discrimination in housing choice. The Center for Justice has three offices throughout the state, and they may be contacted through the information below. The Center for Justice may also be contacted through an online contact form available at <http://www.mscenterforjustice.org/contact-us>.

Address (Jackson Office):

5 Old River Place
Suite 203 (39202)
P.O. Box 1023
Jackson, MS 39215-1023
Telephone: (601) 352-2269
Fax: (601) 352-4769

Address (Biloxi Office):

3 Division Street
Biloxi, MS 39530-296
Telephone: (228) 435-728
Fax: (228) 435-7285

Address (Indianola Office):

120 Court Avenue
Indianola, MS 38751
Telephone: (662) 887-6570
Fax: (662) 887-6571

COMPLAINT PROCESS REVIEW

COMPLAINT PROCESSES FOR FAIR HOUSING AGENCIES

U.S. Department of Housing and Urban Development

The intake stage is the first step in the complaint process. When a complaint is submitted, intake specialists review the information and contact the complainant (the party alleging housing discrimination) in order to gather additional details and determine if the case qualifies as possible housing discrimination. If the discriminatory act alleged in the complaint occurred within the jurisdiction of a substantially equivalent 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

⁴⁸ Mississippi Center for Justice. "Our Work". Mississippi Center for Justice Website. 24 July 2014. <<http://www.mscenterforjustice.org/our-work/our-work>>

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.⁴⁹ 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.⁵⁰

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.⁵¹

SUMMARY

Residents of non-entitlement areas of Mississippi who believe that they have been subjected to illegal discrimination in the housing market can lodge a complaint with the Department of Housing and Urban Development (HUD). HUD conducts complaint intake, investigation, and judges whether or not there is reasonable cause to believe that a fair housing complaint represents a genuine case of discrimination in the housing market. HUD may also resolve complaints found to be with cause through an administrative hearing, though many complainants elect to pursue their claims in a federal civil action. In such cases, HUD refers the complaint to the Department of Justice.

Since 2013, the Mississippi Center for Justice has served residents of the State of Mississippi as a participant in HUD's FHIP program. The Center conducts complaint intake and processing

⁴⁹ "HUD's Title VIII Fair Housing Complaint Process." <http://www.hud.gov/offices/fheo/complaint-process.cfm>

⁵⁰ "Fair Housing—It's Your Right." <http://www.hud.gov/offices/fheo/FHLaws/yourrights.cfm>

⁵¹ "HUD's Title VIII Fair Housing Complaint Process." <http://www.hud.gov/offices/fheo/complaint-process.cfm>

for HUD in addition to a variety of services that it provides in furtherance of its commitment to advance racial and economic justice.

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 Mississippi'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 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.⁵² The analysis presented herein is from the HMDA data system.

⁵² *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>

The HMDA requires both depository and non-depository lenders to collect and publicly disclose information about housing-related applications and loans.⁵³ Both types of lending institutions must meet the following set of reporting criteria:

1. The institution must be a bank, credit union, or savings association;
2. The total assets must exceed the coverage threshold;⁵⁴
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

As presented on the following page in Table V.1, HMDA information was collected for tracts in non-entitlement areas of the State of Mississippi from 2004 through 2012. During this time, 1,255,583 loan applications were reported by participating institutions for home purchases, home improvements, and refinancing mortgages. Of these loan applications, 512,667 were specifically for home purchases.

⁵³ 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.

⁵⁴ 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 Mississippi
 2004–2012 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Home Purchase	75,274	84,156	83,635	66,098	45,683	39,152	39,566	38,772	40,331	512,667
Home Improvement	15,648	16,191	14,502	16,882	13,690	10,282	8,748	7,884	8,048	111,875
Refinancing	95,365	81,453	71,932	69,578	62,830	75,479	61,455	51,657	61,292	631,041
Total	186,287	181,800	170,069	152,558	122,203	124,913	109,769	98,313	109,671	1,255,583

Because access to homeownership is the focus of this analysis, the following discussion will be confined to trends in home purchase loans for owner-occupied housing units. Additional loan statuses, “Not Owner Occupied” or “Not Applicable”, may refer to loans on housing units in which the applicant does not intend to live. Accordingly, the ability to secure such a loan is not necessarily linked to an individual’s ability to choose where he or she lives. As shown in Table V.2, below, of the 512,667 home purchase loan applications submitted during the time period, 459,383 were specifically for owner-occupied homes. The number of owner-occupied home purchase loan applications was highest in 2005 with 84,156 applications.

Table V.2
Occupancy Status for Home Purchase Loan Applications
 Non-Entitlement Areas of Mississippi
 2004–2012 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Owner-Occupied	68,008	76,022	74,075	57,668	39,700	35,338	35,959	35,465	37,148	459,383
Not Owner-Occupied	6,633	7,758	8,876	8,048	5,563	3,712	3,521	3,238	3,128	50,477
Not Applicable	633	376	684	382	420	102	86	69	55	2,807
Total	75,274	84,156	83,635	66,098	45,683	39,152	39,566	38,772	40,331	512,667

Denial Rates

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

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

These outcomes were used to determine denial rates presented in the following section. Factors in denial of home purchase loans, such as credit scores or down payment amounts, are not reported in every report submitted through the HMDA, so the reasons for specific loan denials are often unknown. However, with that caveat in mind, the ratio of loan originations to loan denials can be seen as an indicator of the overall success or failure of home purchase loans. Altogether, there were 193,718 loan originations and 84,435 applications denied in

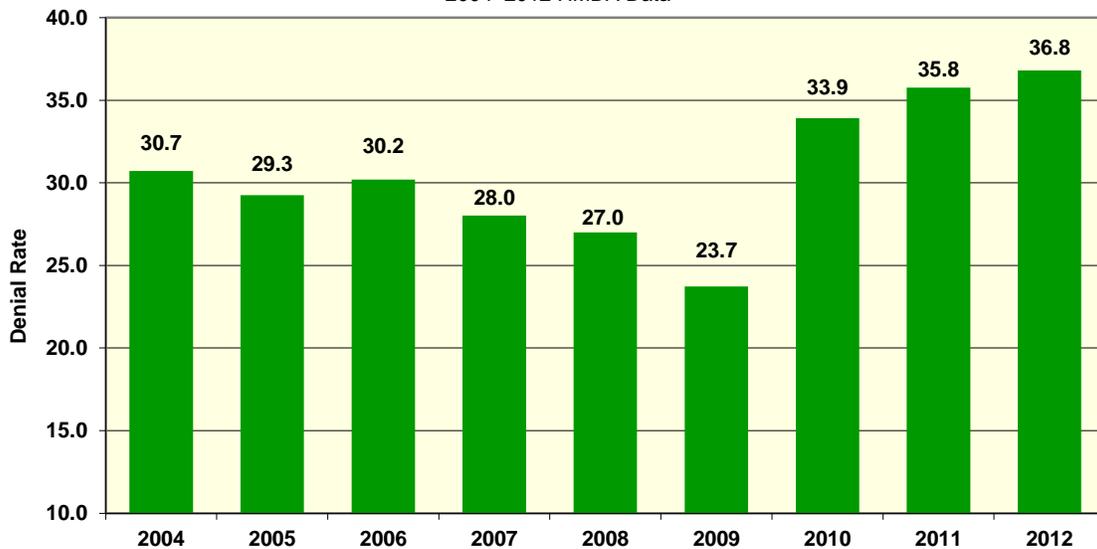
non-entitlement areas of the State of Mississippi, for an average nine-year denial rate of 30.4 percent, as shown in Table V.3 below. A version of this table with yearly loan data is included in Appendix E as Table E.2.

Table V.3
Loan Applications by Action Taken
 Non-Entitlement Areas of Mississippi
 2004–2012 HMDA Data

Action	Total
Loan Originated	193,718
Application Approved but not Accepted	29,635
Application Denied	84,435
Application Withdrawn by Applicant	27,792
File Closed for Incompleteness	7,536
Loan Purchased by the Institution	115,969
Preapproval Request Denied	287
Preapproval Approved but not Accepted	11
Total	459,383
Denial Rate	30.4%

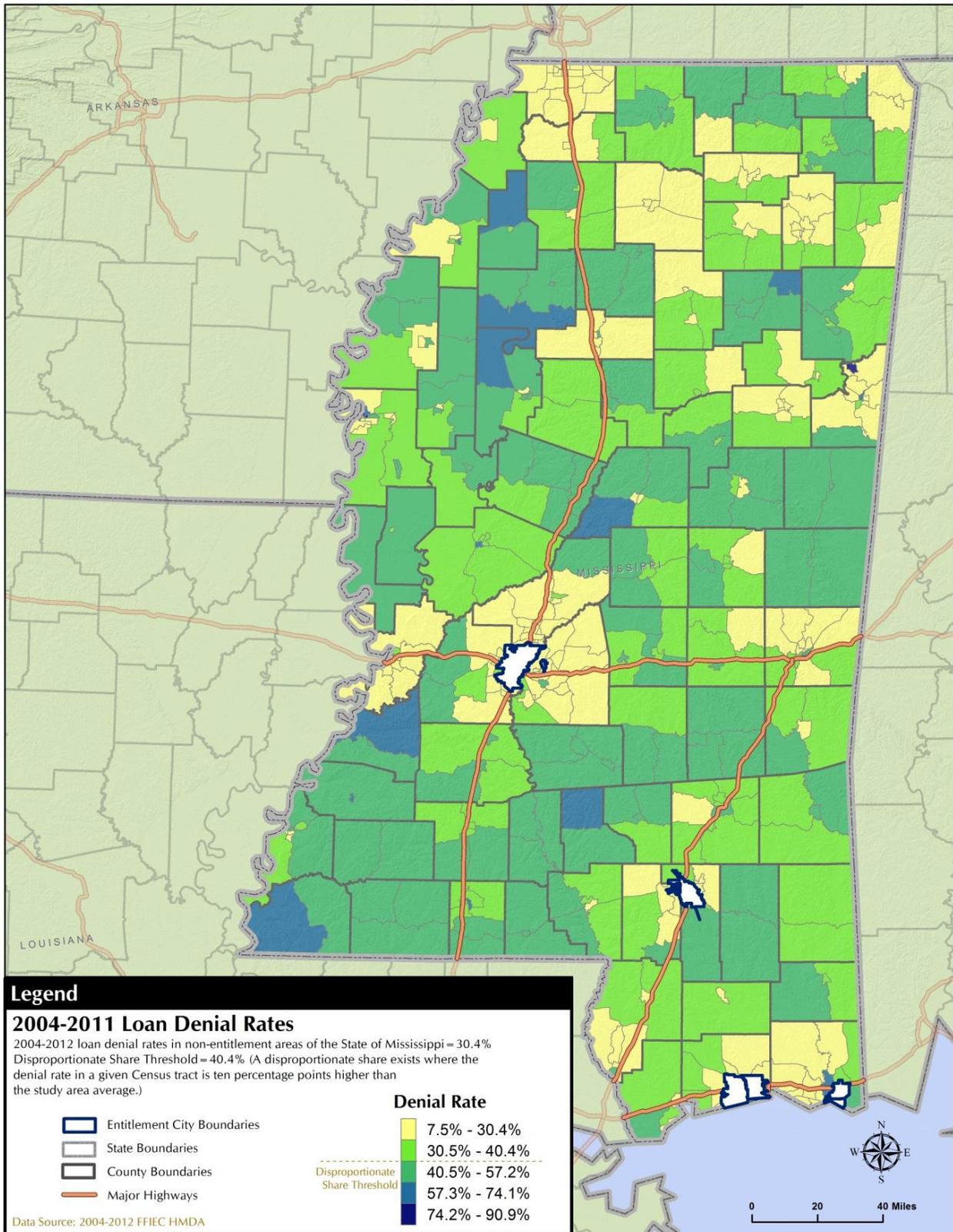
Annual denial rates fluctuated considerably between 2004 and 2012, ranging from a relatively low 23.7 percent in 2009 to 36.8 percent in 2012, as shown in Diagram V.1, below. Denial rates increased considerably in recent years, and topped 35 percent in 2011 and 2012. These rates were higher than what had been observed over the prior 7 years.

Diagram V.1
Denial Rates by Year
 State of Mississippi
 2004–2012 HMDA Data

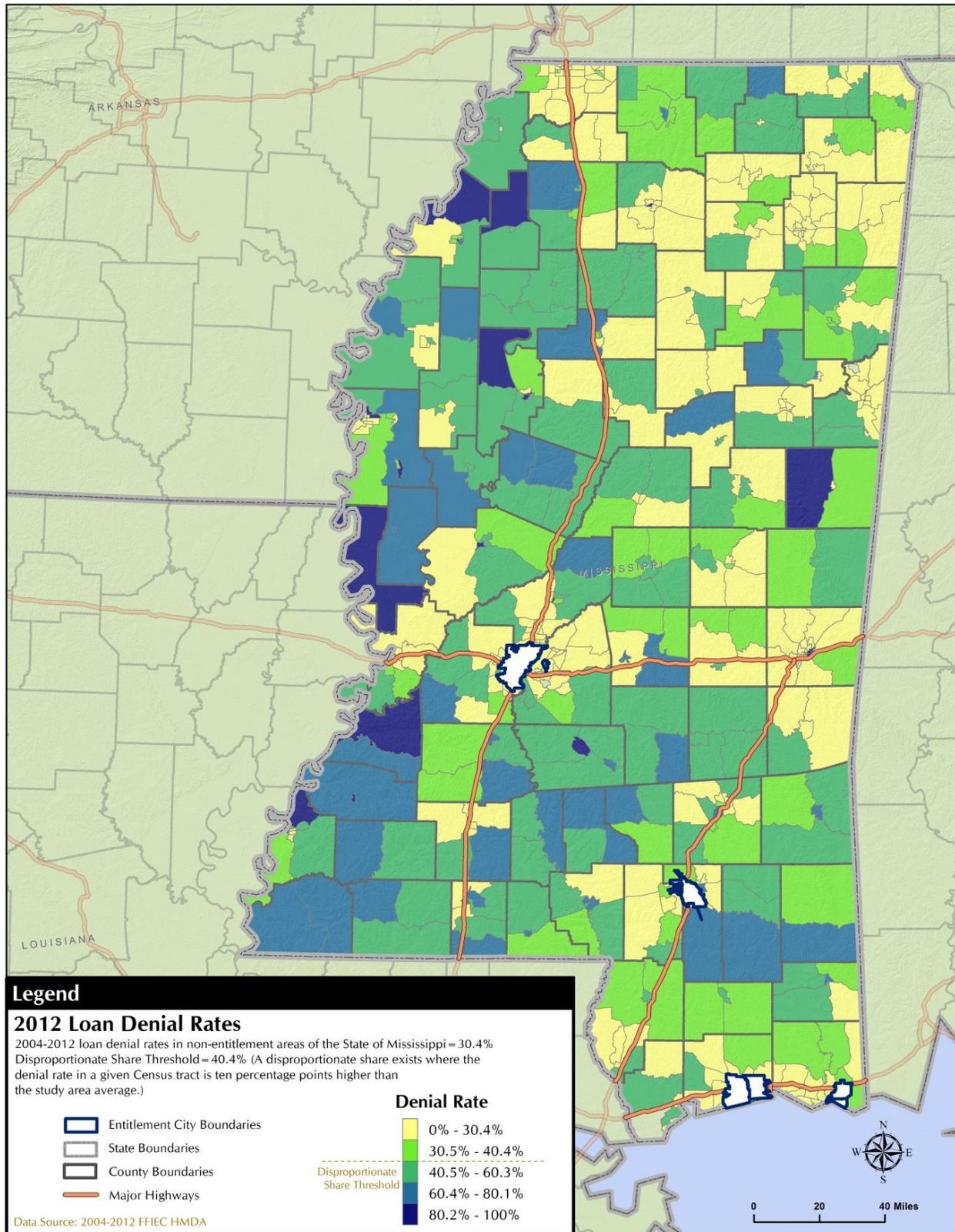


In addition to showing marked variation by year, denial rates showed some geographic variation across the State in the years between 2004 and 2011, as shown in Map V.1, on the following page. Areas with above average rates of loan denials were concentrated in tracts to the north of Columbus and Greenville. Several of these areas were observed to have relatively high concentrations of black residents, as well as relatively high poverty rates. In 2012, disproportionately high rates of loan denials were observed to be clustered in the Delta region and throughout the western part of the state, as shown in Map V.2 on page 86.

Map V.1
Denial Rates by Census Tract, 2004-2011
 Non-Entitlement Areas of Mississippi
 2004-2012 HMDA Data



Map V.2
Denial Rates by Census Tract, 2012
 Non-Entitlement Areas of Mississippi
 2004-2012 HMDA Data



In addition to yearly and geographic variations in denial rates discussed above, rates of home loan denials were observed to differ markedly across gender lines, as shown in Table V.4, below. The denial rate for female applicants was much higher than the rate for male applicants in every year between 2004 and 2012. The average denial rate for female applicants during this time was 36.1 percent, compared to a denial rate of 26.6 percent for male applicants, and the discrepancy between the two was 9.5 percentage points on average. However, the denial rate for female applicants was over 10 percentage points higher than it was for male applicants in the three most recent years included in the HMDA data. In 2012, female applicants were turned down at a rate of 45.8—14.6 percentage points higher than the rate for male applicants in that year.

Table V.4
Denial Rates by Gender of Applicant
Non-Entitlement Areas of Mississippi
2004–2012 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	27.0%	36.1%	53.6%	.0%	30.7%
2005	25.8%	34.0%	49.5%	35.3%	29.3%
2006	26.6%	35.3%	47.9%	55.6%	30.2%
2007	24.7%	33.1%	45.0%	13.3%	28.0%
2008	23.6%	32.4%	45.8%	74.5%	27.0%
2009	21.6%	27.2%	38.4%	.0%	23.7%
2010	29.8%	40.5%	51.4%	20.0%	33.9%
2011	30.9%	42.7%	64.2%	25.0%	35.8%
2012	31.2%	45.8%	68.3%	25.0%	36.8%
Average	26.6%	36.1%	50.6%	41.6%	30.4%

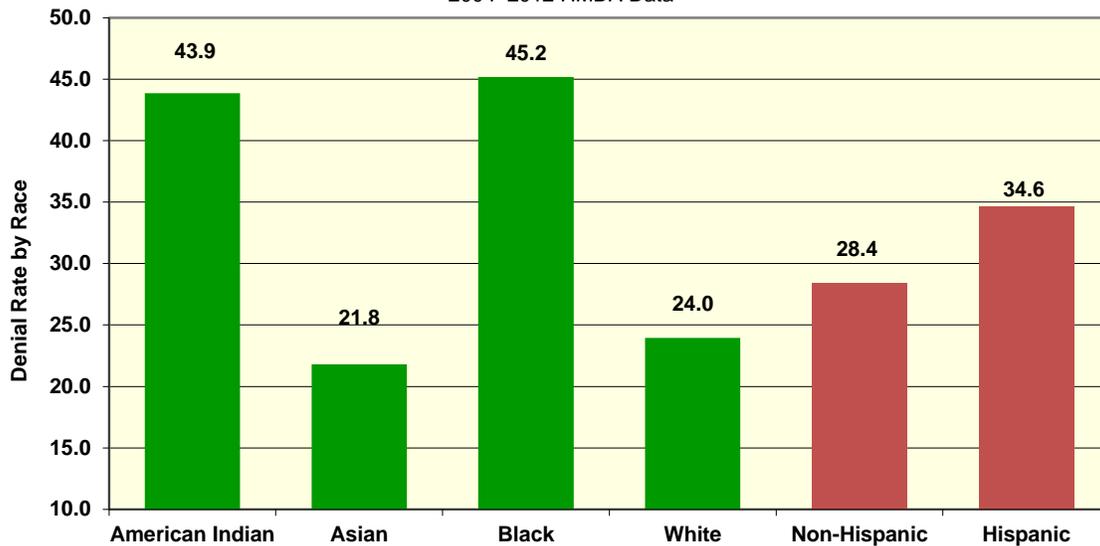
Denial rates also showed considerable variation by race and ethnicity between 2004 and 2012, as shown in Table V.5, below. The denial rate for black applicants was 45.2 percent, more than 20 percentage points higher than the denial rate for white residents during that time. In terms of ethnicity, Hispanic applicants were denied loans at a higher rate than non-Hispanic applicants in every year during this period. The overall denial rate for Hispanic applicants was 34.6 percent, more than six points higher than the rate for non-Hispanic residents, which was 28.4 percent.

Table V.5
Denial Rates by Race/Ethnicity of Applicant
Non-Entitlement Areas of Mississippi
2004–2012 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	2012	Average
American Indian	36.6%	33.3%	44.4%	30.4%	49.3%	50.0%	65.1%	46.4%	61.0%	43.9%
Asian	24.4%	19.6%	21.2%	17.8%	27.4%	21.2%	24.2%	18.2%	25.6%	21.8%
Black	45.7%	41.3%	42.6%	42.0%	40.5%	36.5%	49.7%	55.2%	59.5%	45.2%
White	23.6%	23.1%	24.0%	22.0%	22.2%	19.6%	27.5%	28.2%	27.5%	24.0%
Not Available	49.4%	45.5%	43.2%	42.2%	41.6%	39.2%	55.3%	60.3%	65.3%	47.1%
Not Applicable	37.0%	40.0%	50.0%	11.1%	72.7%	0.0%	20.0%	25.0%	25.0%	43.8%
Average	30.7%	29.3%	30.2%	28.0%	27.0%	23.7%	33.9%	35.8%	36.8%	30.4%
Non-Hispanic	28.9%	27.5%	28.4%	26.8%	25.7%	22.8%	31.9%	32.3%	33.1%	28.4%
Hispanic	44.7%	31.8%	29.7%	32.9%	29.7%	31.7%	38.7%	32.4%	36.6%	34.6%

Diagram V.2, on the following page, shows overall denial rates by race and ethnicity from 2004 through 2012.

Diagram V.2
Denial Rates by Race/Ethnicity of Applicant
 Non-Entitlement Areas of Mississippi
 2004–2012 HMDA Data



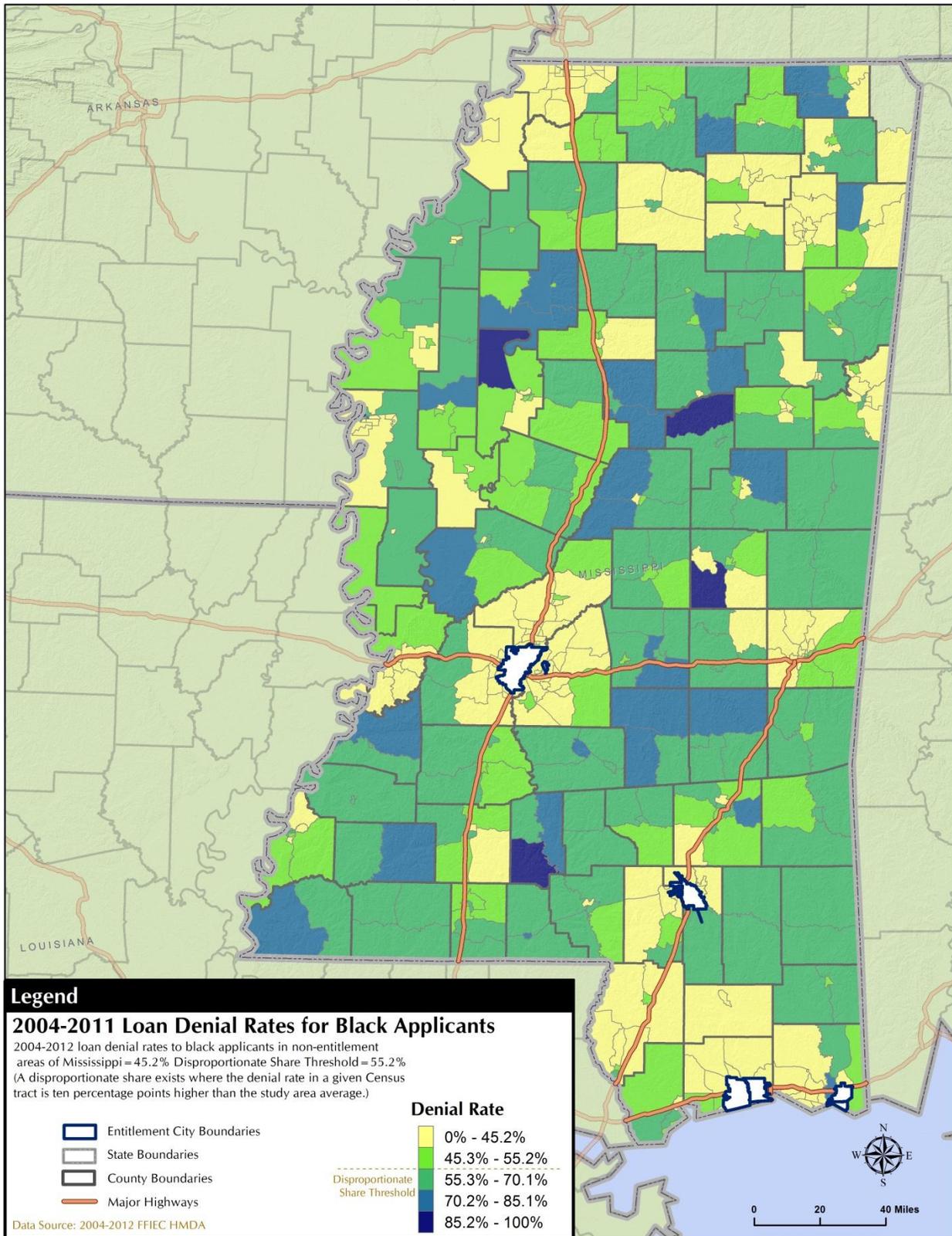
Over the eight-year period from 2004 to 2011, black borrowers tended to be denied loans most frequently outside of areas in which black residents had been disproportionately concentrated in 2000 or 2010, as shown in Map V.3, on the following page. The highest proportions of loan denials to black residents tended to be located in tracts in the center of the state.

Data available through the HMDA often include information regarding the reason for a loan denial, although as noted previously financial institutions are not uniformly required to fill out this field. Nevertheless, where these data were included they suggest that credit history was by far the most common primary factor in loan denials from 2004 to 2012, as shown in Table V.6, below. Credit history was listed as the primary factor in more than a quarter of loan denials in 2004, and by 2009 it was listed as the primary factor in just over 40 percent of loan denials. However, by 2012 the share of loans denied primarily due to credit history had fallen below 35 percent. At the same time, debt-to-income ratio came to be a strong factor in a larger share of loan denials over the eight-year period.

Table V.6
Loan Applications by Reason for Denial
 Non-Entitlement Areas of Mississippi
 2004–2012 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Debt-to-Income Ratio	983	981	1,170	980	857	698	1,122	1,196	1,265	9,252
Employment History	149	118	143	116	66	80	113	114	112	1,011
Credit History	3,358	3,717	4,021	3,323	2,104	1,941	2,895	2,813	2,947	27,119
Collateral	393	593	816	595	304	269	249	223	240	3,682
Insufficient Cash	226	169	170	152	94	71	75	95	63	1,115
Unverifiable Information	204	477	422	198	102	75	59	96	91	1,724
Credit Application Incomplete	345	654	614	585	391	211	155	131	112	3,198
Mortgage Insurance Denied	2	5	4	7	20	11	7	4	1	61
Other	1,048	1,794	1,241	577	278	237	219	164	154	5,712
Missing	5,768	4,329	5,463	3,537	2,459	1,236	2,421	2,755	3,593	31,561
Total	12,476	12,837	14,064	10,070	6,675	4,829	7,315	7,591	8,578	84,435

Map V.3
Denial Rates for Black Applicants by Census Tract, 2004-2011
 Non-Entitlement Areas of Mississippi
 2004-2012 HMDA Data



As one might expect, households with lower incomes tended to be denied for loans more often than households with higher incomes, as shown in Table V.7, below. Households with incomes from \$15,001 to \$30,000 were denied an average of 49.7 percent of the time, while those with incomes above \$75,000 were denied 16 percent of the time on average.

Table V.7
Denial Rates by Income of Applicant
Non-Entitlement Areas of Mississippi
2004–2012 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
\$15,000 or Below	69.1%	70.6%	64.5%	62.0%	68.1%	68.4%	80.0%	83.1%	86.2%	70.9%
\$15,001–\$30,000	47.4%	47.6%	49.1%	46.5%	47.5%	40.5%	53.8%	58.5%	60.2%	49.7%
\$30,001–\$45,000	30.6%	30.4%	32.6%	30.7%	29.6%	25.0%	35.1%	38.0%	39.9%	32.8%
\$45,001–\$60,000	24.7%	23.2%	26.9%	24.3%	24.1%	20.5%	28.6%	29.9%	32.7%	26.1%
\$60,001–\$75,000	15.9%	17.5%	20.1%	19.8%	19.3%	17.1%	21.4%	23.0%	24.3%	19.5%
Above \$75,000	12.4%	14.6%	16.7%	16.1%	14.5%	12.3%	15.8%	16.9%	17.3%	16.0%
Data Missing	32.3%	18.3%	21.3%	28.4%	30.3%	27.9%	45.5%	49.7%	29.4%	19.8%
Total	30.7%	29.3%	30.2%	28.0%	27.0%	23.7%	33.9%	35.8%	36.8%	30.4%

Minority racial and ethnic applicants often faced much higher loan denial rates than white and non-Hispanic applicants, even after correcting for income as shown in Table V.8, below. For example, black applicants who made between \$15,000 and \$30,000 per year were turned down 57.5 percent of the time, while only 42.3 percent of white applicants in the same income range were denied loans: a discrepancy of 15.2 percentage points. Among those making more than \$75,000, black applicants were denied 29 percent of the time, while 12.3 percent of applications from white residents were denied. Though the disparity was not as pronounced in the case of loan denials by ethnicity, the denial rate for Hispanic applicants was still markedly higher than denial rates for non-Hispanic applicants at all income levels.

Table V.8
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
Non-Entitlement Areas of Mississippi
2004–2012 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
American Indian	90.5%	50.5%	44.6%	47.6%	40.8%	29.4%	31.3%	43.9%
Asian	60.7%	39.2%	25.1%	20.3%	13.3%	13.4%	29.1%	21.8%
Black	78.0%	57.5%	41.0%	35.5%	30.9%	29.0%	49.3%	45.2%
White	63.9%	42.3%	27.2%	21.7%	16.2%	12.3%	19.2%	24.0%
Not Available	74.3%	69.8%	50.1%	41.5%	30.6%	28.1%	45.1%	47.1%
Not Applicable	50.0%	59.1%	83.3%	55.6%	.0%	20.8%	45.7%	43.8%
Average	70.9%	49.7%	32.8%	26.1%	19.5%	16.0%	19.8%	30.4%
Non-Hispanic	69.6%	47.4%	30.2%	23.9%	18.4%	14.2%	23.2%	28.4%
Hispanic	77.4%	47.6%	37.5%	30.2%	21.4%	18.2%	27.3%	34.6%

Predatory Style Lending

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

1. If they are HOEPA loans;⁵⁵
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.⁵⁶

For the 2014 AI analysis, originated owner-occupied home purchase loans qualifying as HALs were examined for 2004 through 2012. There were 47,817 of these high-rate loans issued in non-entitlement areas of the State of Mississippi between 2004 and 2012. In all, 24.7 percent of the loans issued in these non-entitlement areas during that time were HALs, as shown in Table V.9, below.

Table V.9
Originated Owner-Occupied Loans by HAL Status

Non-Entitlement Areas of Mississippi
2004–2012 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Other	20,503	20,483	21,462	19,483	13,725	12,605	12,669	12,020	12,951	145,901
HAL	7,630	10,550	11,030	6,386	4,320	2,922	1,586	1,611	1,782	47,817
Total	28,133	31,033	32,492	25,869	18,045	15,527	14,255	13,631	14,733	193,718
Percent HAL	27.1%	34.0%	33.9%	24.7%	23.9%	18.8%	11.1%	11.8%	12.1%	24.7%

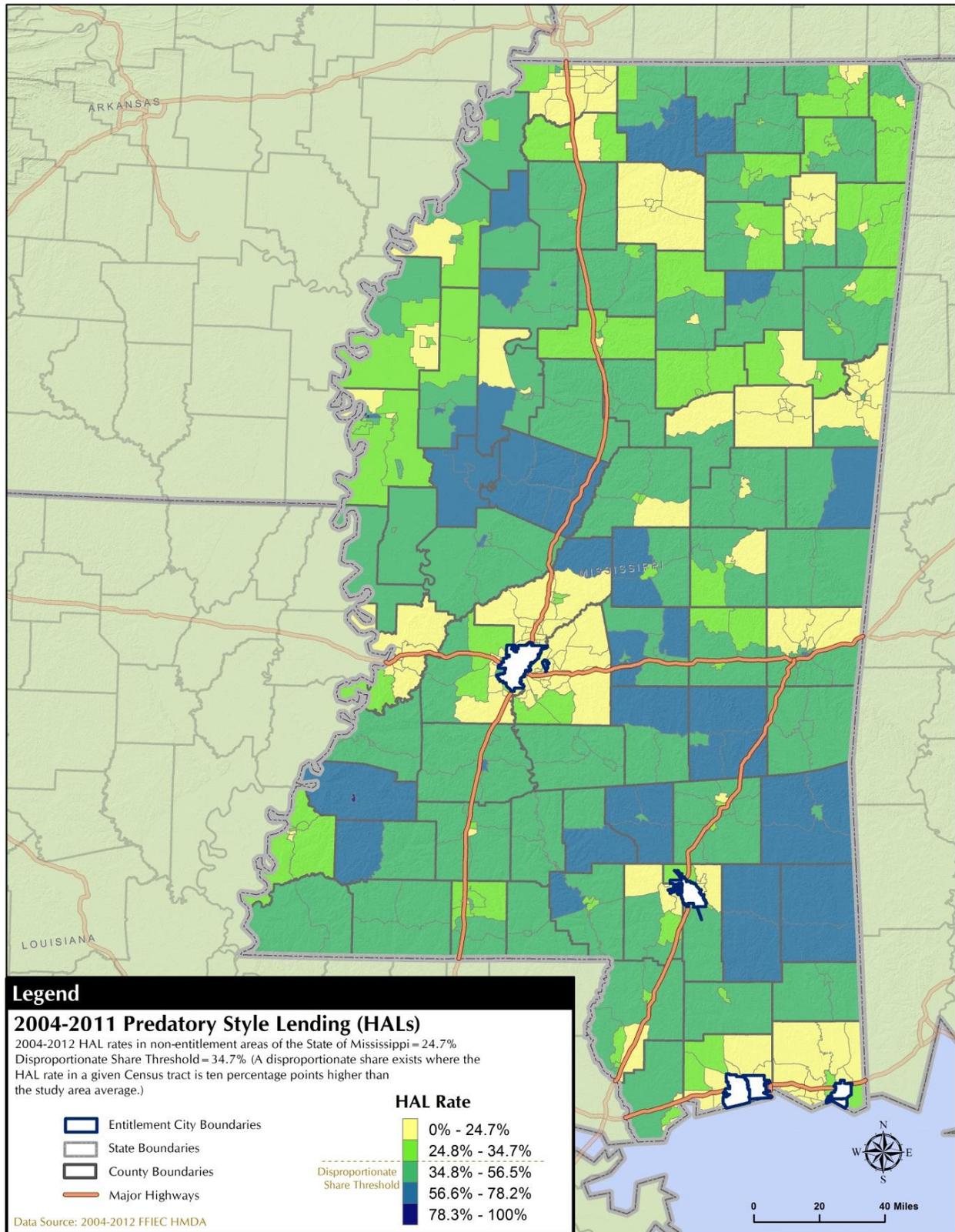
Census tracts with disproportionately high rates of HALs were scattered throughout non-entitlement areas of the state from 2004 through 2011, as shown in Map V.4, on the following page. These tended to be larger, more rural Census tracts, while Census tracts that surrounded urban areas of the state tended to have lower rates of predatory style lending. This remained true in 2012, as shown in Map V.5 on page 93, though in that year Census tracts with disproportionate rates of HALs tended to be absent from Census tracts in the northern and central parts of the state.

The rate at which loans with high annual percentage rates were issued to borrowers in non-entitlement areas of Mississippi varied over the nine years under consideration, as noted previously. The highest HAL rates were observed in 2005 and 2006; since that time, they have been less prevalent. However, though the number of HALs has declined it remains essential to examine the characteristics of borrowers who have been issued such loans. The greatest number of HALs by far was issued to white residents of non-entitlement areas of the state of Mississippi; these residents received 30,639 high-APR loans between 2004 and 2012, as shown in Table V.10, on page 94.

⁵⁵ 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>

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

Map V.4
Rate of HALs by Census Tract, 2004-2011
 Non-Entitlement Areas of Mississippi
 2004-2012 HMDA Data



Map V.5
Rate of HALs by Census Tract, 2012
 Non-Entitlement Areas of Mississippi
 2004–2012 HMDA Data

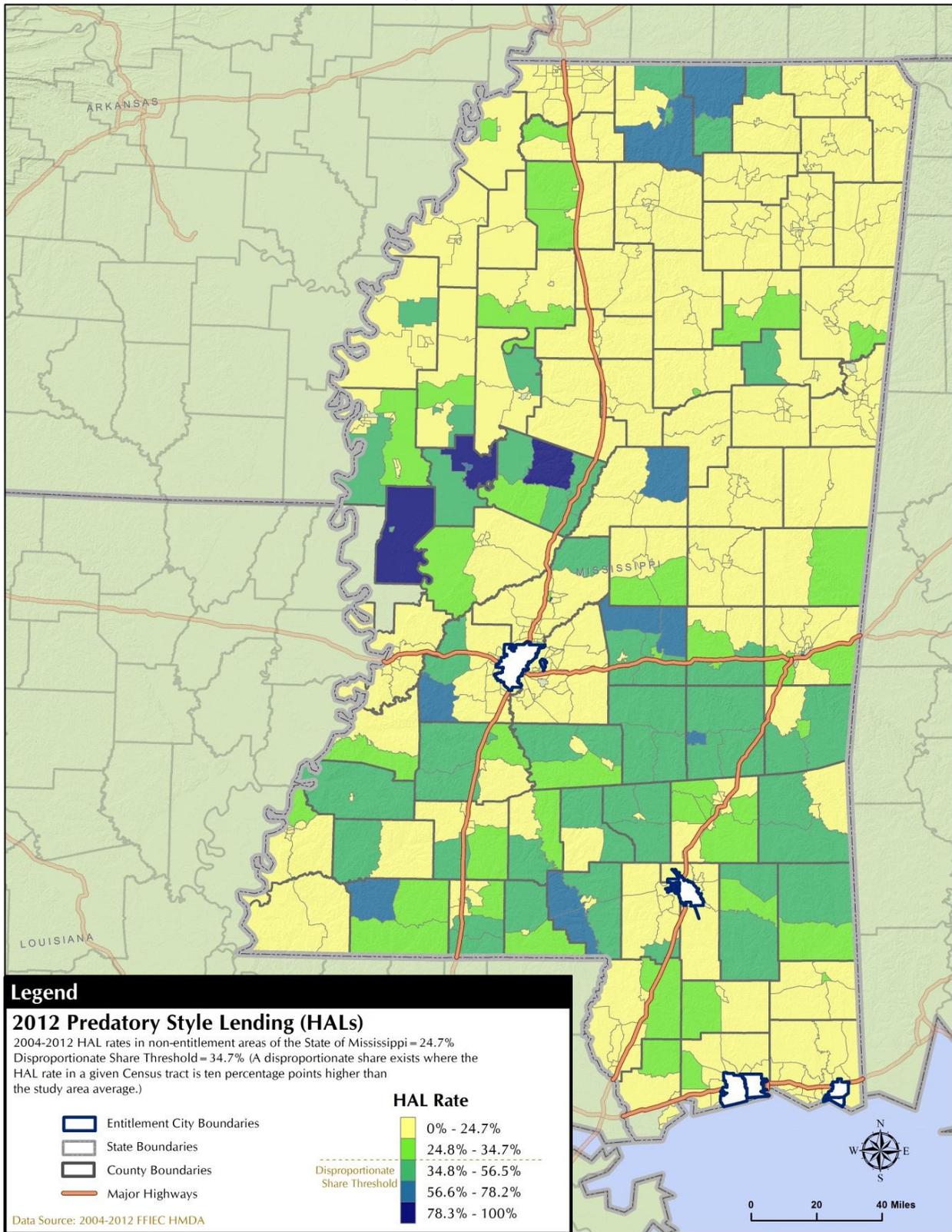


Table V.10
HALs Originated by Race of Borrower
 Non-Entitlement Areas of Mississippi
 2004–2012 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
American Indian	21	39	32	14	8	3	6	1	4	128
Asian	53	88	99	57	39	33	5	15	14	403
Black	2,181	3,616	3,494	1,761	865	448	412	387	502	13,666
White	4,774	6,008	6,477	4,175	3,319	2,400	1,141	1,156	1,189	30,639
Not Available	595	797	928	378	89	38	22	52	73	2,972
Not Applicable	6	2	0	1	0	0	0	0	0	9
Total	7,630	10,550	11,030	6,386	4,320	2,922	1,586	1,611	1,782	47,817
Non-Hispanic	6,342	9,441	9,806	5,907	4,165	2,793	1,501	1,400	1,497	42,852
Hispanic	154	184	227	92	48	41	12	21	25	804

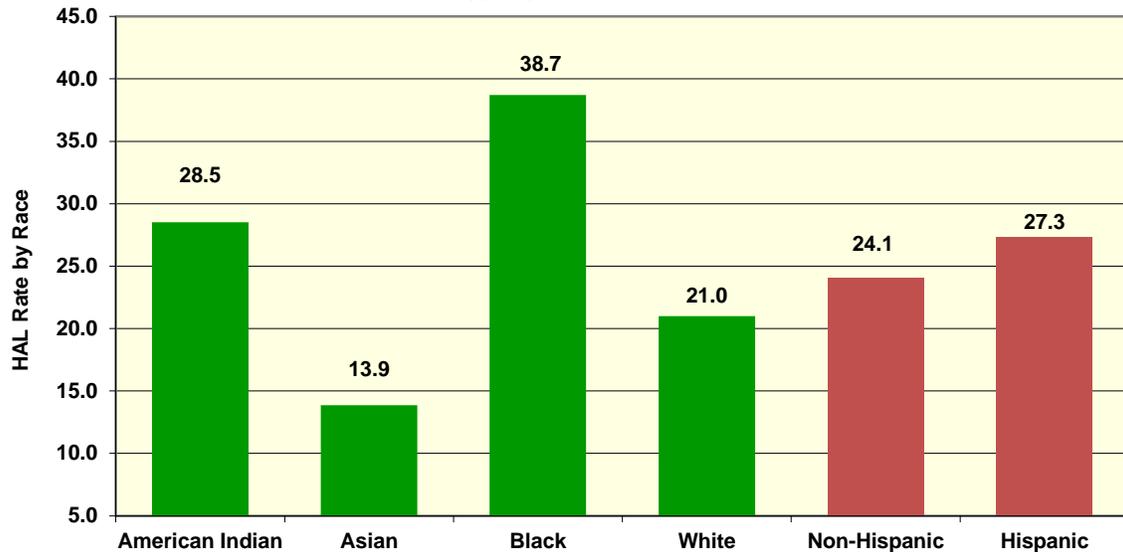
While the greatest *number* of HALs went to white borrowers, black borrowers were almost twice as likely to receive HALs as white residents, as shown in Table V.11, below. The disparity between the rate predatory style lending to Hispanic and non-Hispanic borrowers was less pronounced: 27.3 percent of loans issued to Hispanic borrowers between 2004 and 2012 were predatory in nature, while 24.1 percent of non-Hispanic borrowers were issued HALs during that time.

Table V.11
Rate of HALs Originated by Race/Ethnicity of Borrower
 Non-Entitlement Areas of Mississippi
 2004–2012 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	2012	Average
American Indian	26.9%	41.5%	45.7%	21.9%	21.1%	14.3%	27.3%	3.3%	12.5%	28.5%
Asian	15.3%	20.6%	20.7%	14.5%	17.1%	14.3%	2.6%	6.9%	7.2%	13.9%
Black	43.9%	57.0%	52.4%	35.7%	29.8%	18.0%	16.2%	17.6%	22.1%	38.7%
White	22.7%	26.8%	27.9%	21.8%	23.5%	19.5%	10.3%	10.7%	10.0%	21.0%
Not Available	36.4%	45.0%	44.2%	27.8%	12.2%	8.0%	5.5%	13.9%	16.2%	32.4%
Not Applicable	17.6%	22.2%	.0%	12.5%	.0%	.0%	.0%	.0%	.0%	10.0%
Average	27.1%	34.0%	33.9%	24.7%	23.9%	18.8%	11.1%	11.8%	12.1%	24.7%
Non-Hispanic	27.2%	33.1%	32.8%	24.5%	24.5%	18.9%	11.0%	10.8%	10.7%	24.1%
Hispanic	33.3%	34.9%	40.3%	23.4%	19.9%	21.4%	7.1%	11.3%	12.0%	27.3%

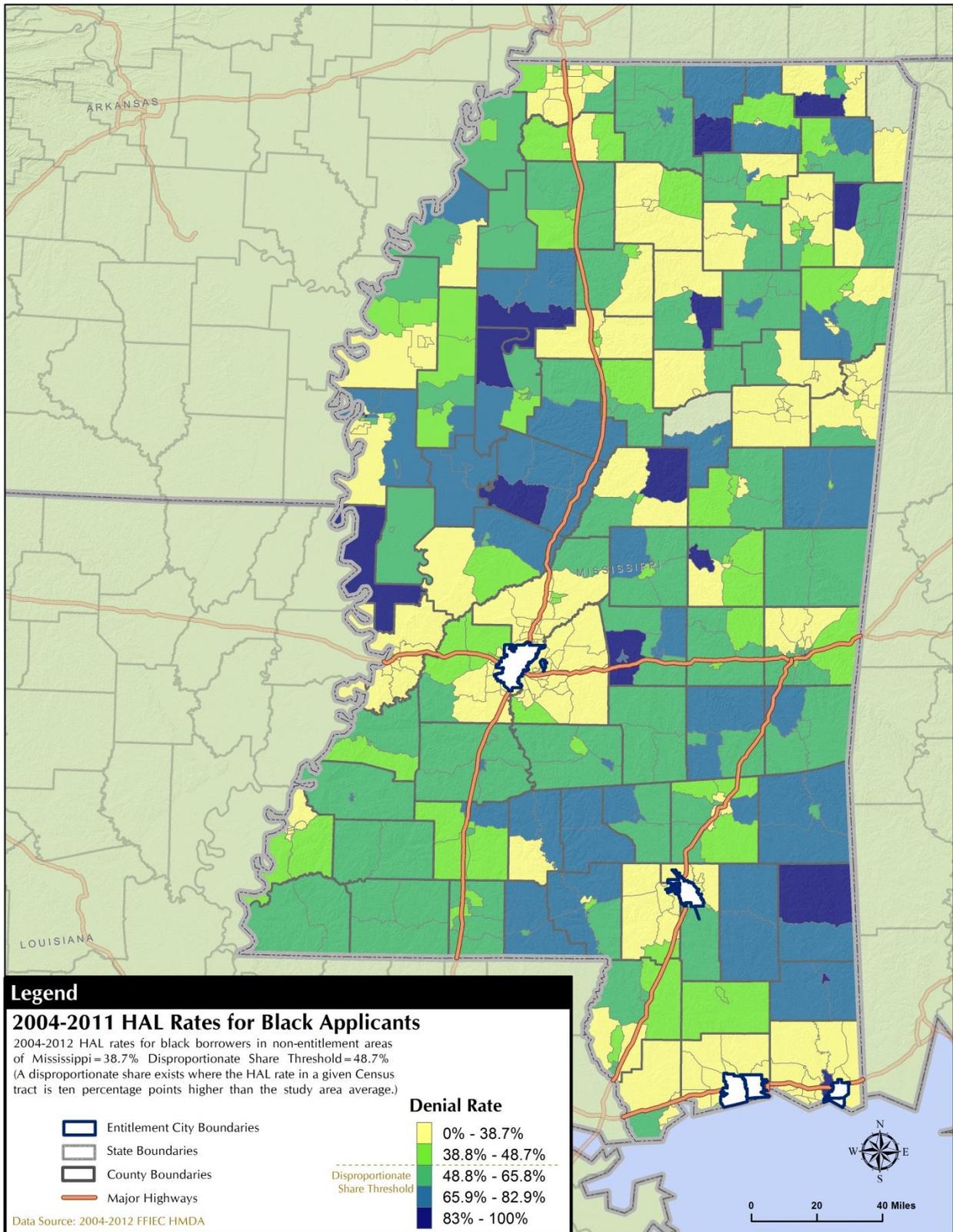
The relative distribution of HALs by racial and ethnic group is presented in Diagram V.3, on the following page. This figure clearly demonstrates the relative prevalence of predatory style loans among black loan applicants as compared to applicants from other races, and among Hispanic applicants as compared to non-Hispanic applicants.

Diagram V.3
Rate of HALs Originated by Race/Ethnicity of Borrower
 Non-Entitlement Areas of Mississippi
 2004–2012 HMDA Data



As had been the case with borrowers overall, predatory style loans were issued to black residents in disproportionate concentrations throughout the non-entitlement areas of the state from 2004 through 2011, as shown in Map V.6, on the following page. These areas tended to comprise large, rural Census tracts, with relatively low HAL rates appearing in Census tracts near entitlement cities and other urban areas.

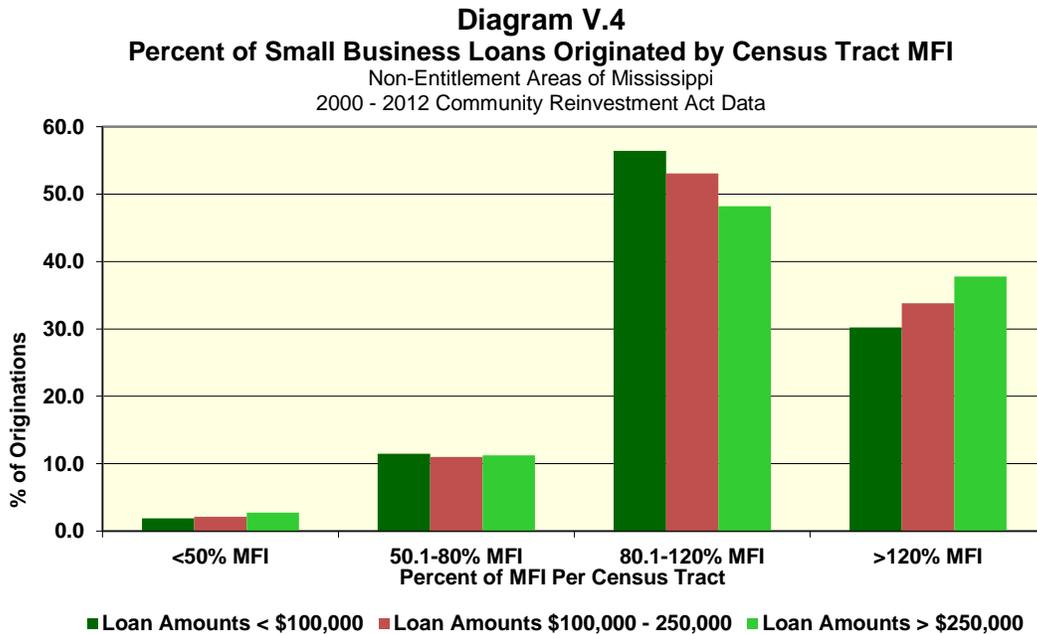
Map V.6
HALs to Black Applicants by Census Tract, 2004-2011
 Non-Entitlement Areas of Mississippi
 2004-2012 HMDA Data



COMMUNITY REINVESTMENT ACT DATA

The economic vitality of neighborhoods can partly be measured through Community Reinvestment Act (CRA) data. According to these data, 663,747 small business loans were extended to businesses in non-entitlement areas of the State of Mississippi during the period from 2000 to 2012. Of these, 360,509 loans went to businesses with annual revenues of less than \$1 million. A majority of all loans, or 608,584 loans, were valued under \$100,000. Tables with complete CRA data are presented in Appendix A.

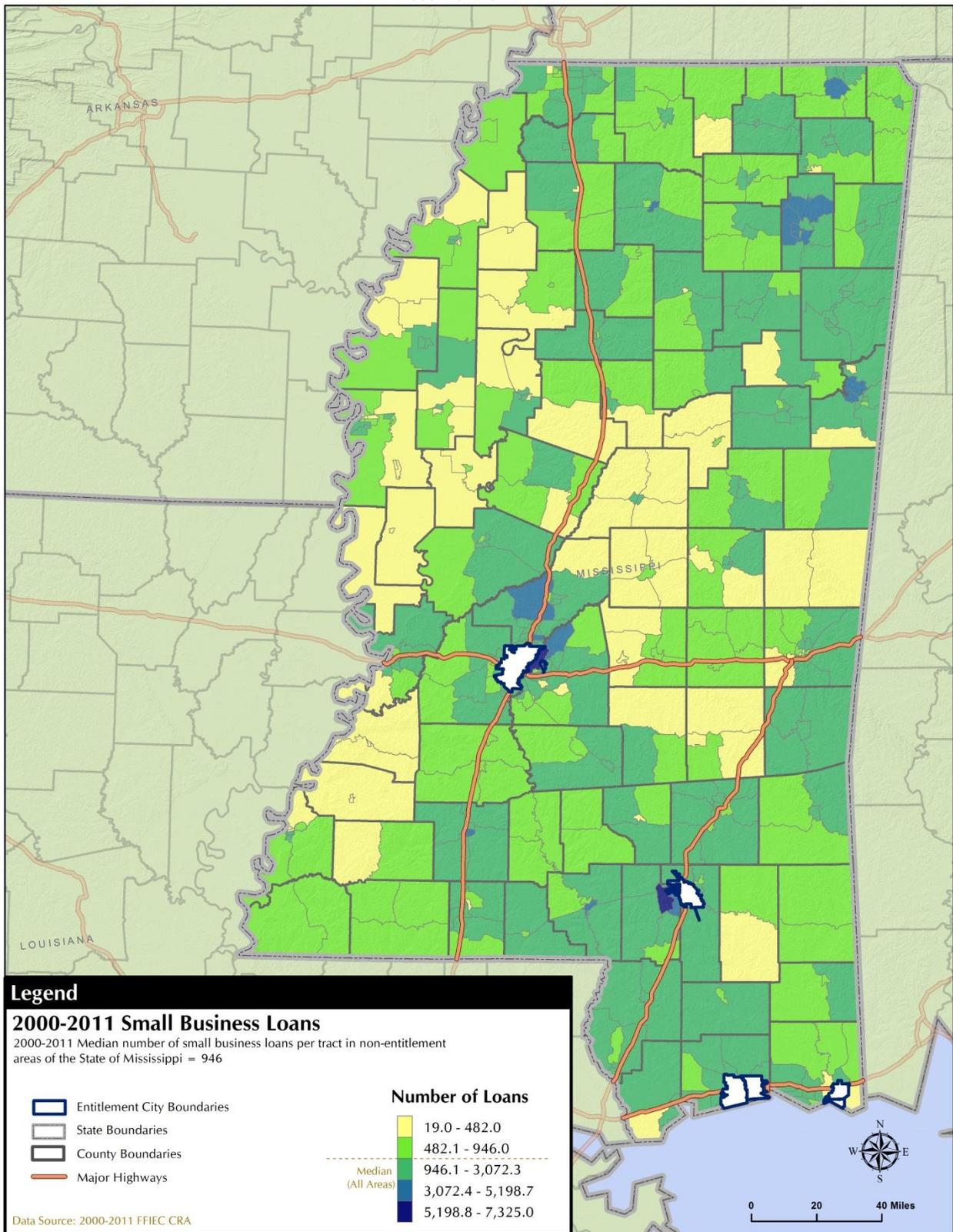
Small business loans were also analyzed to determine the location of funding in relation to median family income (MFI) levels. Diagram V.4, below, presents the distribution of small business loans by value and by percent of MFI by Census tract. Comparatively few loans went to areas with 80 percent or less of the MFI, despite the fact that these loans were designed to aid low- and moderate-income areas. Most small business loans were issued in Census tracts making more than 80 percent of the median family income.



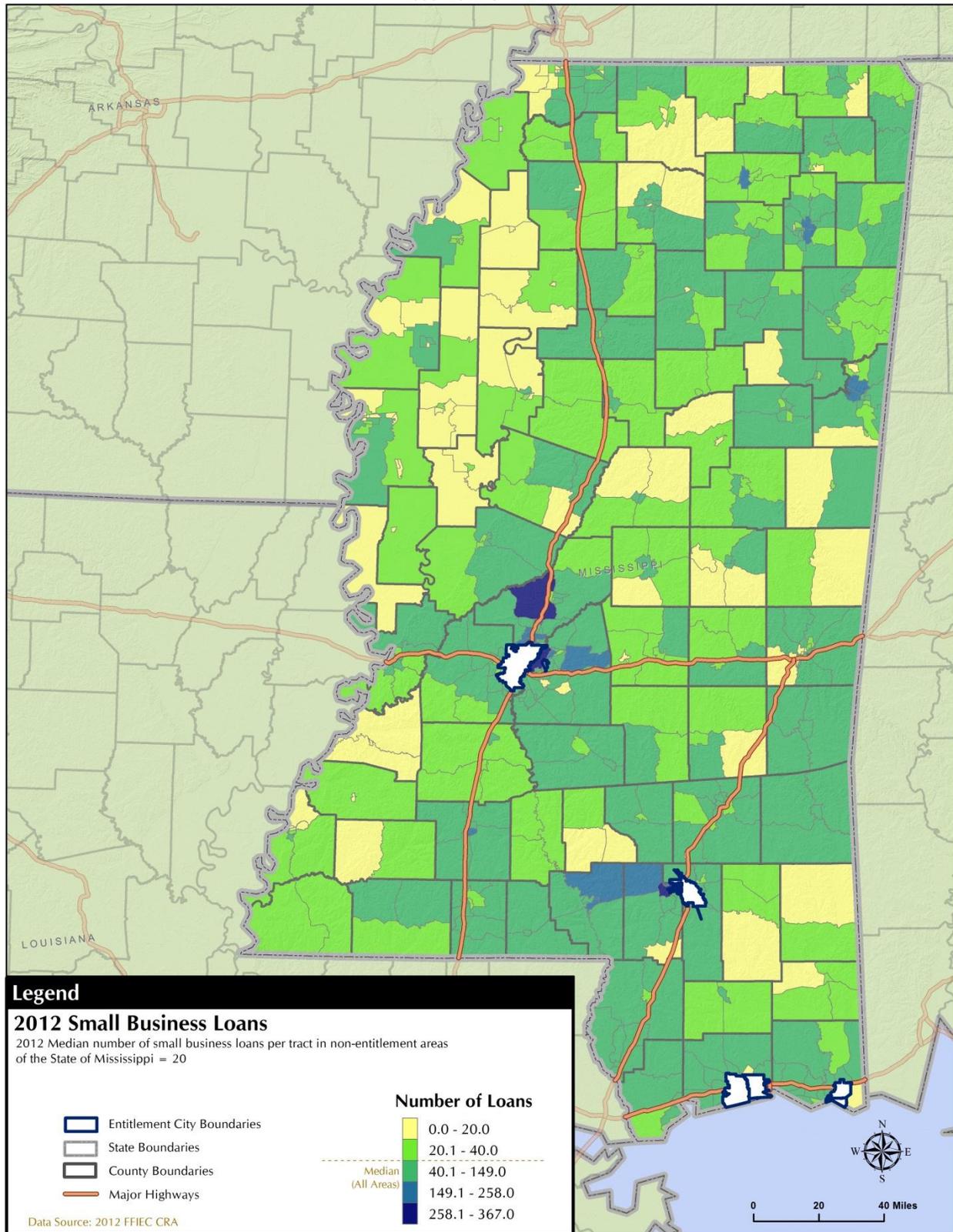
Over the period from 2000 through 2011, the greatest numbers of small business loans were issued in Census tracts around Jackson and Hattiesburg, as shown in Map V.7, on the following page. These tracts were both the recipients of more than 5,198 loans. In general, Census tracts that received fewer than the median number of loans were located in large rural areas, particularly in the East Central and Delta regions. In 2012, the distribution of small business loans in non-entitlement areas of the state resembled the overall pattern observed over the prior 11 years, as shown in Map V.8 on page 87.

Loan dollars tended to follow similarly, as shown in Map V.9 on page 88. During the period from 2000 to 2011, the highest values in loan dollars were issued in Census tracts in and around Jackson, Hattiesburg, Tupelo, Columbus, and Oxford. Tracts that received less than the median amount of loan funding tended to be clustered in rural areas, particularly in the East Central and Delta regions. Map V.10, on page 99 shows that the same overall pattern in the distribution of loan funding held in 2012.

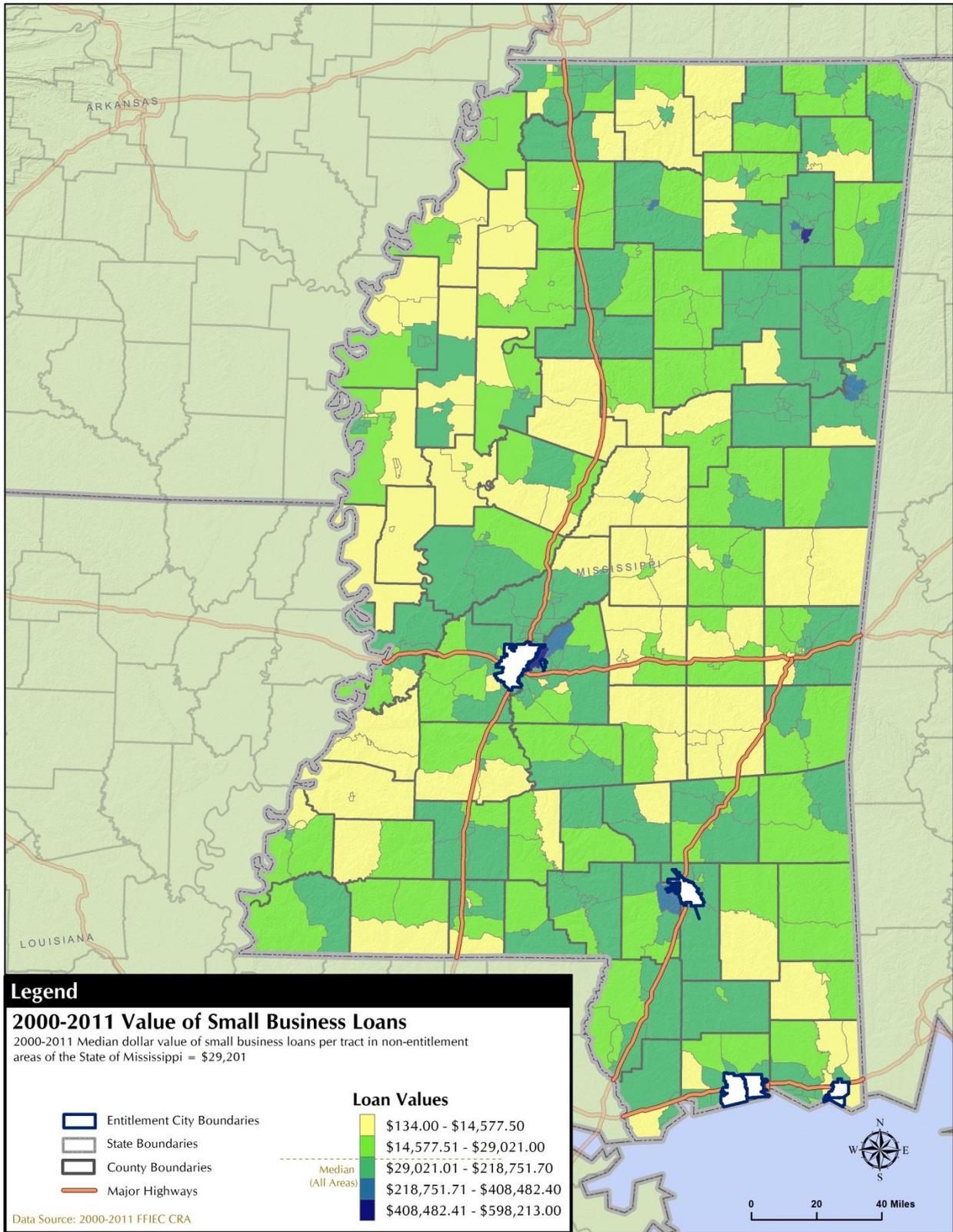
Map V.7
Number of Small Business Loans, 2000-2011
 Non-Entitlement Areas of Mississippi
 2000-2012 CRA Data



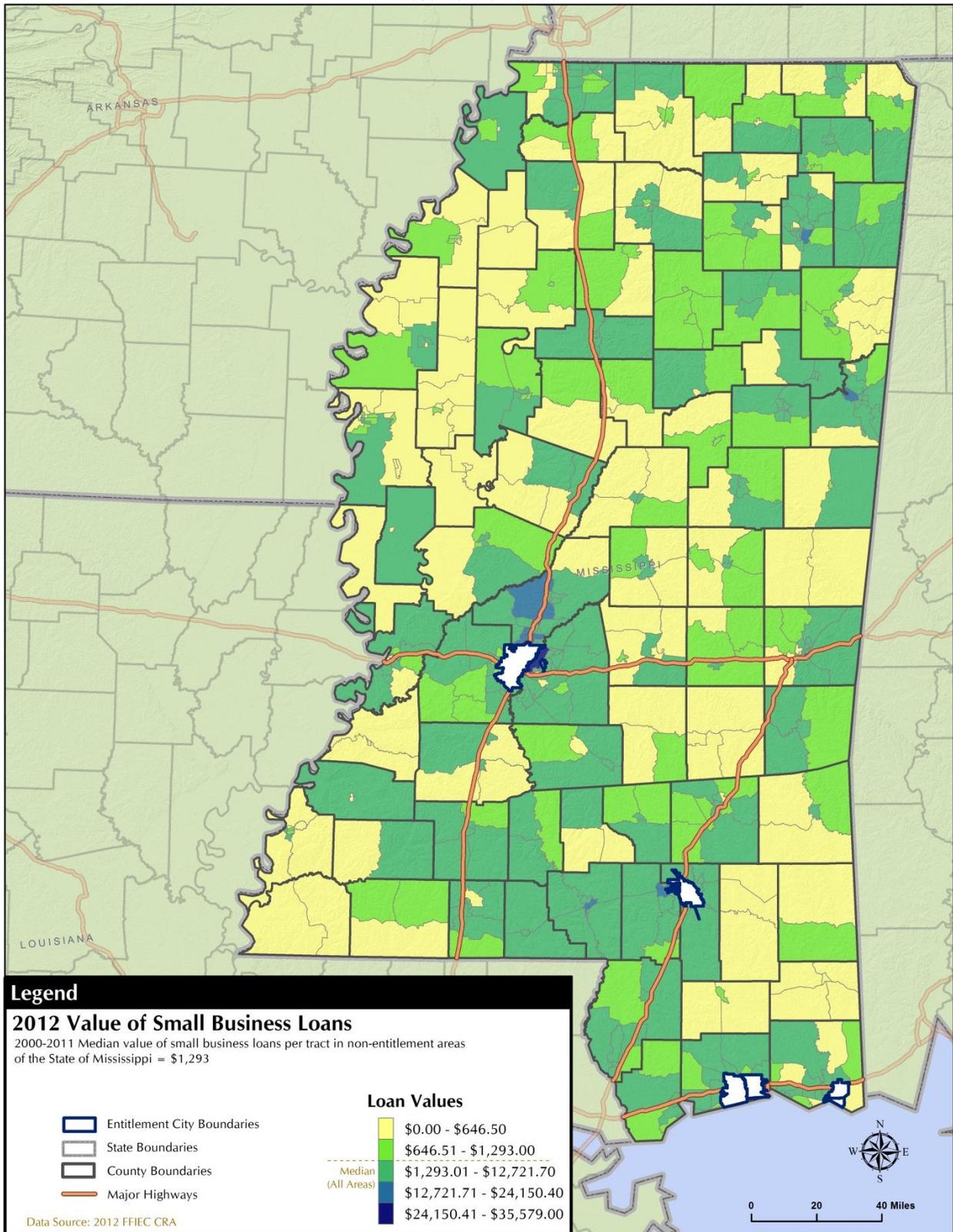
Map V.8
Number of Small Business Loans, 2012
 Non-Entitlement Areas of Mississippi
 2000–2012 CRA Data



Map V.9
Amount of Small Business Loan Dollars, 2000-2011
 Non-Entitlement Areas of Mississippi
 2000-2012 CRA Data



Map V.10
Amount of Small Business Loan Dollars, 2012
 Non-Entitlement Areas of Mississippi
 2000–2012 CRA Data



FAIR HOUSING COMPLAINTS

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

HUD maintains records of complaints that represent potential and actual violations of federal housing law, as described previously in the Complaint Process Review. Over 2004 through 2014 period, HUD reported 329 complaints filed in non-entitlement areas of the State, as shown below in Table V.12.⁵⁷ The number of complaints per year ranged from a maximum of 69 in 2008 to a minimum of 9 in 2013. This table also presents complaint data by basis, or the protected class status of the person allegedly aggrieved in the complaint. Complainants may cite more than one basis, so the number of bases cited can exceed the total number of complaints. As shown, a total of 496 bases were cited in relation to the 329 complaints filed. Race was the most commonly cited complaint basis, cited in 192 complaints, followed by disability, cited in 126 complaints.

Table V.12
Fair Housing Complaints by Basis
Non-Entitlement Areas of Mississippi
2004–2014 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	Total
Race	27	18	17	22	43	18	26	8	6	7		192
Disability	20	9	14	10	22	24	10	5	8	3	1	126
Sex	6	2	7	6	25	10	7	3	6	1		73
Family Status	8	3	3	6	13	12	8	3	4			60
National Origin	3		2	1	4	5	2					17
Retaliation	1	3	1	2	2	1	1	1	2	3		17
Color		1			5			1	1			8
Religion	1				1	1						3
Total Bases	66	36	44	47	115	71	54	21	27	14	1	496
Total Complaints	41	29	29	32	69	38	44	16	21	9	1	329

In addition to the basis for discrimination, HUD records the issue, or alleged discriminatory action related to each complaint. These are presented in Table V.13, on the following page. In the same way that bases are reported, more than one issue may be associated with each complaint. In the State of Mississippi 578 issues were cited, the most frequent issue being discrimination in terms, conditions, or privileges relating to rental, which was cited in 146 complaints. Other common discriminatory issues cited include the following (number of times cited in parentheses):

- Discrimination in term, conditions, privileges, or services and facilities (71);
- Discriminatory refusal to rent (65); and
- Discriminatory acts under Section 818 (coercion, etc.) (63).

A complete version of this table is included in Appendix D as Table D.2.

⁵⁷ Data were provided by HUD's Fort Worth Regional Office.

Table V.13
Fair Housing Complaints by Issue
 Non-Entitlement Areas of Mississippi
 2004–2014 HUD Data

Issue	Total
Discrimination in term, conditions or privileges relating to rental	146
Discriminatory terms, conditions, privileges, or services and facilities	71
Discriminatory refusal to rent	65
Discriminatory acts under Section 818 (coercion, etc.)	63
Failure to make reasonable accommodation	46
Discriminatory advertising, statements and notices	26
Otherwise deny or make housing available	19
Discriminatory financing (includes real estate transactions)	16
Discrimination in the terms or conditions for making loans	11
Discrimination in terms, conditions, privileges relating to sale	11
False denial or representation of availability - rental	9
Discriminatory refusal to rent and negotiate for rental	8
Refusing to provide municipal services or property	8
Failure to permit reasonable modification	7
Discriminatory refusal to sell and negotiate for sale	6
Using ordinances to discriminate in zoning and land use	6
Discriminatory refusal to sell	5
Discrimination in the selling of residential real property	5
Discrimination in services and facilities relating to rental	5
Discriminatory refusal to negotiate for sale	4
Steering	4
Non-compliance with design and construction requirements (handicap)	4
Discriminatory refusal to negotiate for rental	3
False denial or representation of availability - sale	3
Discrimination in making of loans	3
Failure to provide an accessible building entrance	3
Failure to provide usable doors	3
Failure to provide an accessible route into and thru the covered unit	3
Failure to provide usable kitchens and bathrooms	3
Discriminatory advertisement - rental	2
Discrimination in services and facilities relating to sale	2
Other discriminatory acts	2
Use of discriminatory indicators	2
Discriminatory advertising - sale	1
False denial or representation of availability	1
Discrimination in the brokering of residential real property	1
Failure to provide accessible and usable public and common user areas	1
Total Issues	578
Total Complaints	329

Housing complaints filed with HUD can also be examined by closure status, as shown in Table V.14, on the following page. Of the 329 total complaints, 141 were issued a “no cause” determination, which means that discrimination was not found during the HUD investigation. Between 2 and 9 complaints per year were successfully conciliated during this period. A complete version of this table with yearly complaint data is included in Appendix D as Table D.3.

Table V.14
Fair Housing Complaints by
Closure Status

Non-Entitlement Areas of Mississippi
 2004–2014 HUD Data

Closure Status	Total
No Cause	141
Withdrawal After Resolution	55
Conciliated / Settled	42
Complainant Failed to Cooperate	28
Withdrawal Without Resolution	23
Lack of Jurisdiction	19
Unable to Locate Respondent	13
Election Made to Go to Court	4
Untimely Filed	2
FHAP Judicial Consent Order	1
Trial has Begun	1
Total Complaints	329

Table V.15, below, presents the bases cited for the complaints found to be with cause, many of which were successfully conciliated or settled. In those 97 complaints, there were 133 bases cited, with 51 related to race and 41 related to disability. These bases represented classes of persons protected under the federal Fair Housing Act.

Table V.15
Fair Housing Complaints Found With Cause by Basis

Non-Entitlement Area of Mississippi
 2004–2014 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	Total
Race	3	2	8	8	15	4	6	1	2	2		51
Disability	8	1	5	2	6	9	4	3		2	1	41
Sex	1		3	1	6		1	1	2	1		16
Family Status		1		1	6	3	2		2			15
Retaliation		1							2	1		4
Color					3							3
National Origin				1	2							3
Total Bases	12	5	16	13	38	16	13	5	8	6	1	133
Total Complaints	10	4	11	10	22	13	12	5	6	3	1	97

The complaints found to be with cause are separated by issue, or discriminatory action, in Table V.16, on the following page. The most commonly cited issues in these 97 complaints were discriminatory terms, conditions, or privileges relating to rental; discriminatory terms, conditions, privileges, or services and facilities; and failure to make reasonable accommodation. The relative prevalence of the types of discriminatory issues found to be with cause differs slightly from the prevalence of issues alleged in all fair housing complaints, including those not found to have cause, as detailed previously in Table V.13. However, discrimination in the rental housing market figured strongly in both datasets, suggesting that fair housing complaints are more likely to come from residents who rent, even though these residents constitute a smaller share of the housing market than homeowners in the State of Mississippi. A complete version of this table with yearly complaint data is included in Appendix D as Table D.4.

Table V.16
Fair Housing Complaints Found With
Cause by Issue

Non-Entitlement Areas of Mississippi
 2004–2014 HUD Data

Issue	Total
Discrimination in terms, conditions or privileges relating to rental	43
Discriminatory terms, conditions, privileges, or services and facilities	25
Failure to make reasonable accommodation	18
Discriminatory refusal to rent	15
Discriminatory acts under Section 818 (coercion, etc.)	13
Discriminatory advertising, statements and notices	7
Otherwise deny or make housing available	6
Discriminatory refusal to rent and negotiate for rental	3
False denial or representation of availability - rental	3
Discriminatory financing (includes real estate transactions)	3
Failure to provide an accessible building entrance	2
Failure to permit reasonable modification	2
Discriminatory refusal to sell	1
Discriminatory refusal to negotiate for rental	1
Discrimination in making of loans	1
Discrimination in the terms or conditions for making loans	1
Discrimination in the selling of residential real property	1
Steering	1
Refusing to provide municipal services or property	1
Non-compliance with design and construction requirements (handicap)	1
Failure to provide accessible and usable public and common user areas	1
Failure to provide usable doors	1
Failure to provide an accessible route into and thru the covered unit	1
Failure to provide usable kitchens and bathrooms	1
Total Issues	152
Total Complaints	97

FAIR HOUSING SURVEY – PRIVATE SECTOR RESULTS

Additional evaluation of fair housing within the State of Mississippi was conducted via an online survey of stakeholders that began in April 2014. 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 2014 State of Mississippi Fair Housing Survey was completed by 256 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 Mississippi’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 below in Table V.17. Not every respondent who began the survey elected to answer these questions, and the number of missing responses per question ranged from 51 to 53. Note that any percentages reported below are percentages of respondents who answered a given question, or the total number of respondents less the number of missing responses.

Table V.17
Barriers to Fair Housing in the Private Sector
 State of Mississippi
 2014 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
The rental housing market?	38	85	47	86	256
The real estate industry?	23	78	67	88	256
The mortgage and home lending industry?	23	75	71	87	256
The housing construction or accessible housing design fields?	15	77	78	86	256
The home insurance industry?	8	74	85	89	256
The home appraisal industry?	21	72	76	87	256
Any other housing services?	9	73	86	88	256

Rental Housing

Half of all respondents, or 50 percent who answered this question, stated that they were not aware of barriers to fair housing choice in the rental housing market. However, 22.4 percent of respondents, or 38 persons, stated that they were aware of any such barriers. The proportion of positive responses was higher for this question than for any other question concerning discrimination in the private sector. Many of those who offered additional commentary on this question shared a perception that discrimination is persistent yet subtle in the state. According to one respondent, “[m]ost landlords aren’t direct in their refusal, but many clients get ‘I have nothing available after turning in their application’”. Perceived racial discrimination in the rental housing market was especially salient among survey respondents, as was discrimination on the basis of family status (i.e., the number of children in a family).

Real Estate Industry

Only 23 respondents were aware of any barriers to fair housing choice in the real estate industry, representing about 13.7 percent of those who responded to the question. Nearly half of all respondents professed to be unaware of any such barriers, and nearly 40 percent of respondents selected “Don’t know”. Comments submitted with this question revealed a common perception that real estate agents practice steering and redlining.

Mortgage and Home Lending Industry

Of those who responded to the question concerning barriers to fair housing choice in the mortgage and home lending industry, 13.6 percent indicated that they were aware of such barriers, or 23 respondents. Over 85 percent of respondents were not aware of any such barriers or did not know well enough to reply. Once again, redlining was a common allegation among survey respondents.

Housing Construction or Accessible Housing Design Fields

Only 15 respondents, or 8.8 percent, were aware of barriers to fair housing choice in the housing construction or accessible design fields. Over 45.3 percent stated that they were not aware of any such barriers, and 45.9 percent selected “Don’t know” in response to this question. Several commenters maintained that new home construction does not consistently incorporate accessibility requirements in the design of the home.

Home Insurance Industry

Only 8 respondents, or 4.8 percent, noted barriers to fair housing choice in the home insurance industry, while over 95 percent of those who took the survey were not aware of any barriers in this field or indicated that they did not know well enough to respond. Again, redlining was a common complaint among those who offered additional commentary in response to this question.

Home Appraisal Industry

Twenty-one respondents, or 12.4 percent, noted that they were aware of barriers to fair housing choice in the home appraisal industry, while more than 85 percent of respondents either were not aware of such barriers or did not feel that they knew enough to weigh in on the issue. One survey respondent reported that he or she had “experienced this first hand”, and once again redlining was a common complaint.

Any Other Housing Services

Respondents were also asked to discuss their awareness of barriers to fair housing in any other area of the private housing sector. Nine respondents noted awareness of other issues, representing 5.4 percent of all respondents who answered the question. Commentary on this subject was predictably wide-ranging, and respondents cited discrimination on the basis of sexual orientation, discrimination on the part of private rental housing providers, and

complicated application processes for public housing assistance as barriers to fair housing choice.

SUMMARY

Private sector data that may suggest the presence of barriers to fair housing choice include data that detail patterns of lending and investment, fair housing complaints, and public perception of conditions in the housing market. Data collected through the Home Mortgage Disclosure Act (HMDA) reveal that 193,718 home purchase loans were originated in non-entitlement areas of Mississippi from 2004 through 2012, and 84,435 were denied, for an average denial rate of 30.4 percent. Black residents, Hispanic residents, and women were denied loans at a considerably higher rate than the average; in the case of racial and ethnic minorities, these discrepancies held even when income was taken into account. Similarly, black and Hispanic borrowers were issued predatory style loans at a higher rate than white and Hispanic borrowers, as well as the overall average rate of 24.7 percent.

Analysis of data collected under the Community Reinvestment Act (CRA) provides for an overall portrait of the distribution of loans and loan dollars in non-entitlement areas of the state. Though such loans are intended to promote economic development in low- and medium-income areas, they were more frequently issued in Census tracts in which the median income was greater than 80.1 percent of the median family income of the counties in which those Census tracts were located. These Census tracts tended to be located in and around urban areas of the state; notably Jackson, Hattiesburg, Columbus, Tupelo, and Oxford. Rural Census tracts in the East Central and Delta regions tended to receive less in the way of loans and loan dollars.

A substantial number of Mississippi residents who lodged housing discrimination complaints with HUD alleged that housing providers had discriminated against them on the basis of race. Alleged discrimination on this basis was cited in 192 of the 329 complaints lodged with HUD between 2004 and 2014, followed by disability and sex, cited in 126 and 73 complaints, respectively. Familial status figured in 60 complaints lodged with HUD over the same period. The largest share of complainants cited “discrimination in terms, conditions, or privileges relating to rental”, and “discriminatory refusal to rent” was also frequently cited.

Results from the Private Sector section of the 2014 Fair Housing Survey revealed that a majority of respondents typically were not aware of any barriers to fair housing choice in any of the industries or institutions mentioned, or did not know enough to weigh in on these questions. Perceived discrimination in rental housing was the most salient form of discrimination among survey respondents: more than a fifth of respondents claimed to be aware of housing discrimination in this area. In commentary submitted with the survey questions, perceived redlining on the part of housing providers and financiers was common. Many commenters also cited perceived discrimination on the bases of race, disability, and familial status.

SECTION VI. FAIR HOUSING IN THE PUBLIC SECTOR

While the previous section presented a review of the status of fair housing in the private sector, this section will focus specifically on fair housing in the public sector. The U.S. Department of Housing and Urban Development (HUD) recommends that the AI investigate a number of housing factors within the public sector, including health and safety codes, construction standards, zoning and land use policies, tax policies, and development standards. The AI should also examine the placement of public and publicly assisted housing as well as its access to government services.

PUBLIC SERVICES

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

MULTI-FAMILY ASSISTED HOUSING UNITS

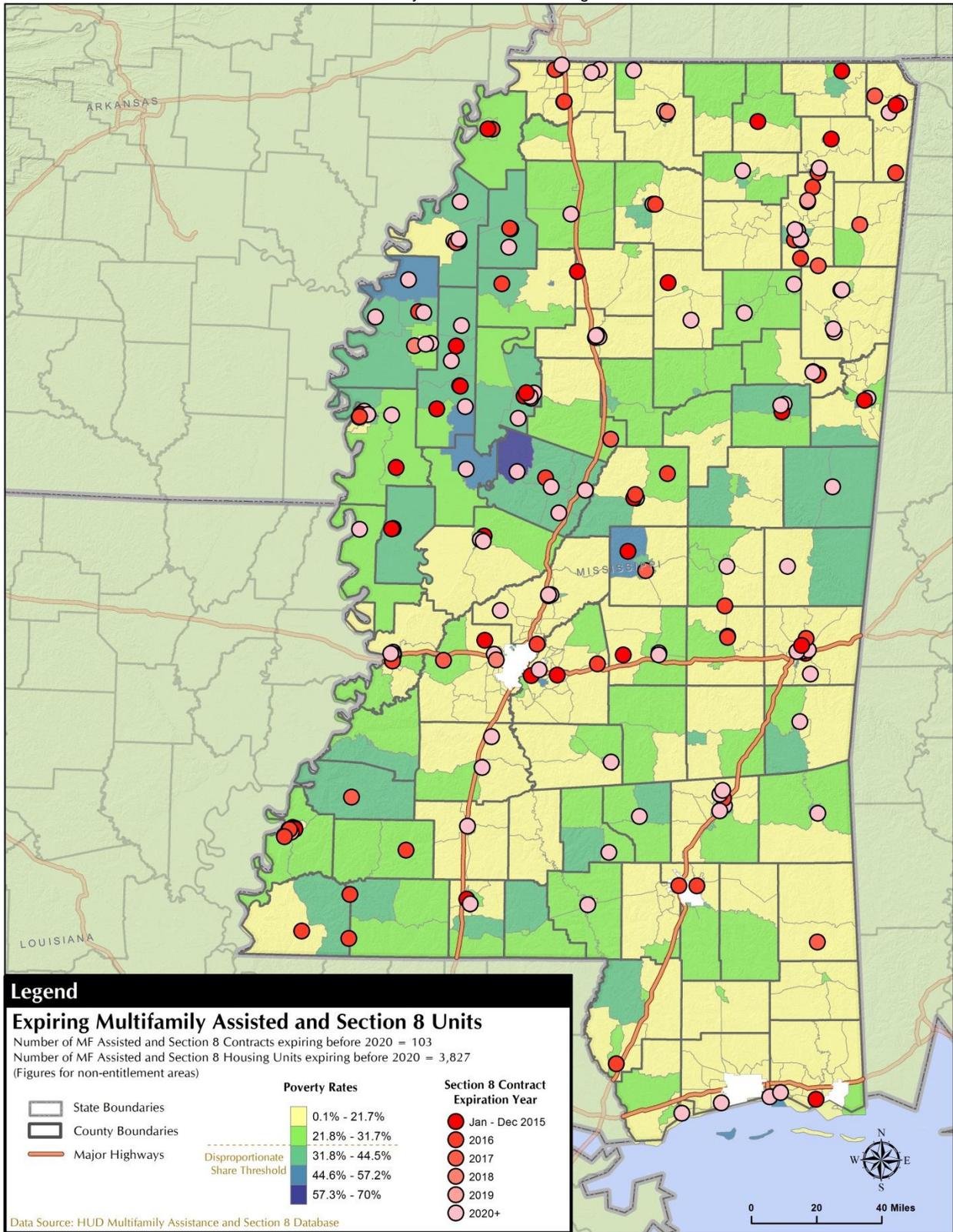
Public or assisted housing can exist in several forms, including low-income housing projects, housing voucher programs, and supportive housing. The objective of public and other forms of assisted housing is to provide housing that is suitable for persons with special needs or families of low- to moderate-income levels and to promote access to jobs, transportation, and related community resources. Uneven distribution of public and assisted housing can be the result of an impediment such as land use policies that discourage multi-family or low-income housing in some areas, thus leading to segregation or the overconcentration of low-income and other populations.

Map VI.1, on the following page, shows multi-family housing properties funded by HUD rental assistance and their relation to areas of poverty, along with year in which these subsidies are set to expire.⁵⁸ These units were distributed widely throughout the state, though they tended to be somewhat more concentrated in areas in the north of the state and along major transportation corridors.

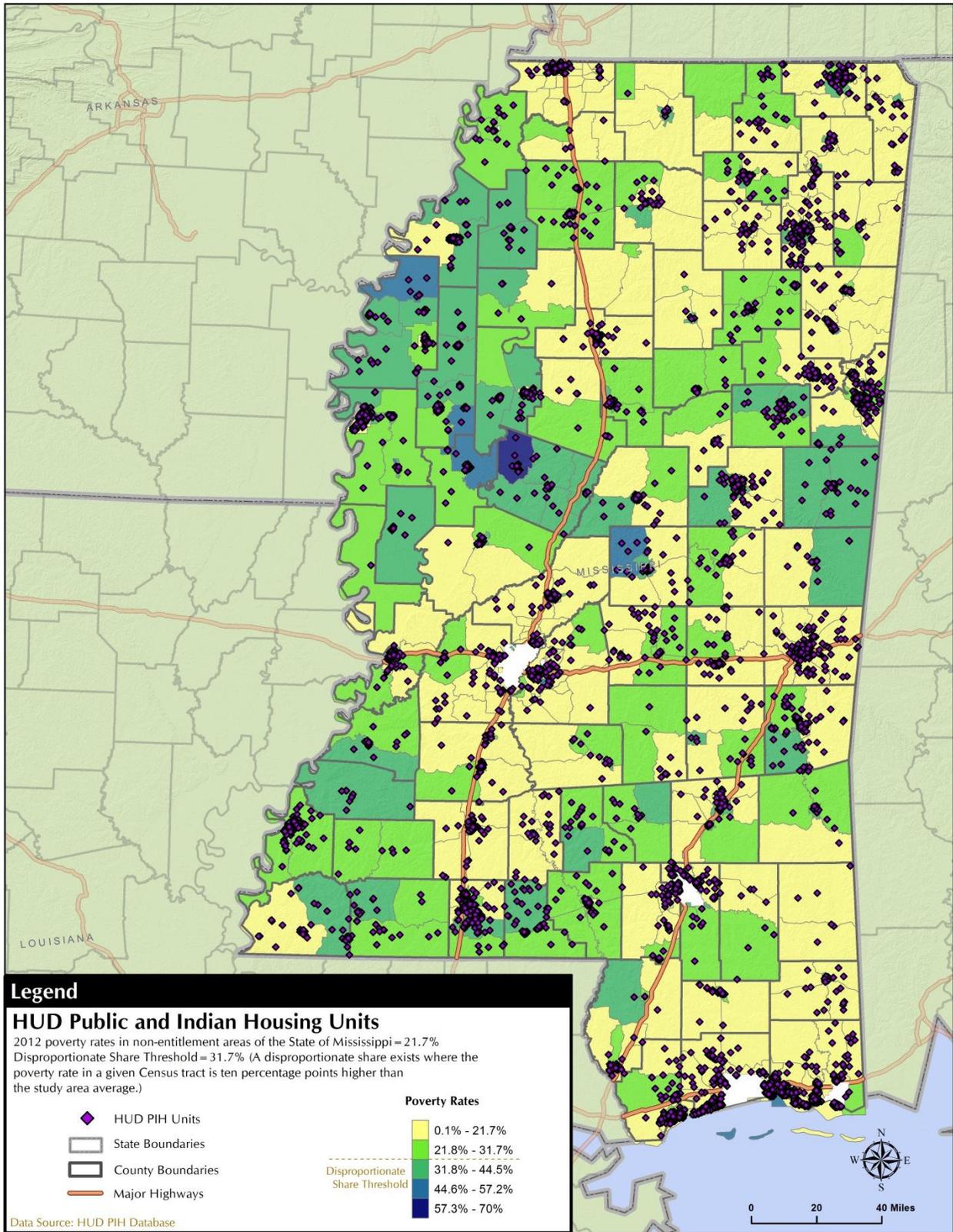
Map VI.2, on page 111, provides another portrait of assisted housing units in the state. The units included on this map are units administrated through the Public and Indian Housing program, which is charged with providing affordable housing to participants in a variety of federal programs, including Section 8 Vouchers and Project Based Units. As shown in the map, these units tended to be clustered in or near urban areas and areas with higher levels of poverty.

⁵⁸ HUD Multifamily Assistance and Section 8 Contracts database, May 2014, http://portal.hud.gov/hudportal/HUD?src=/program_offices/housing/mfh/exp/mfhdiscl

Map VI.1
Multi-Family Assisted Housing Units
 Non-Entitlement Areas of Mississippi
 2014 Multi-family and Section 8 Housing Database



Map VI.2
HUD Public and Indian Housing Units
 Non-Entitlement Areas of Mississippi
 2014 HUD LIHTC Database



LOW-INCOME HOUSING TAX CREDIT PROGRAM

The Low-Income Housing Tax Credit (LIHTC) Program is designed to promote investment in affordable rental housing by providing tax credits to developers of qualified projects. To qualify for the tax credits, housing projects must be residential rental properties in which a proportion of available units are rent-restricted and reserved for low-income families. The exact proportions of units that need to be reserved for low-income families for a project to qualify for LIHTC credits varies according to which threshold the property owner elects to implement: at least 20 percent of housing units must be occupied by families with incomes equal to or less than the area median income (as determined by HUD) according to the 20-50 rule, while at least 40 percent of units must be reserved for families earning less than 60 percent of the area median income if the property owner elects to follow the 40-60 rule. Area median incomes are adjusted for household size. Property owners are required to maintain rent and income restrictions for at least thirty years, pursuant to the HUD-mandated minimum affordability period, though in some areas they are required to operate under these restrictions for longer time periods.

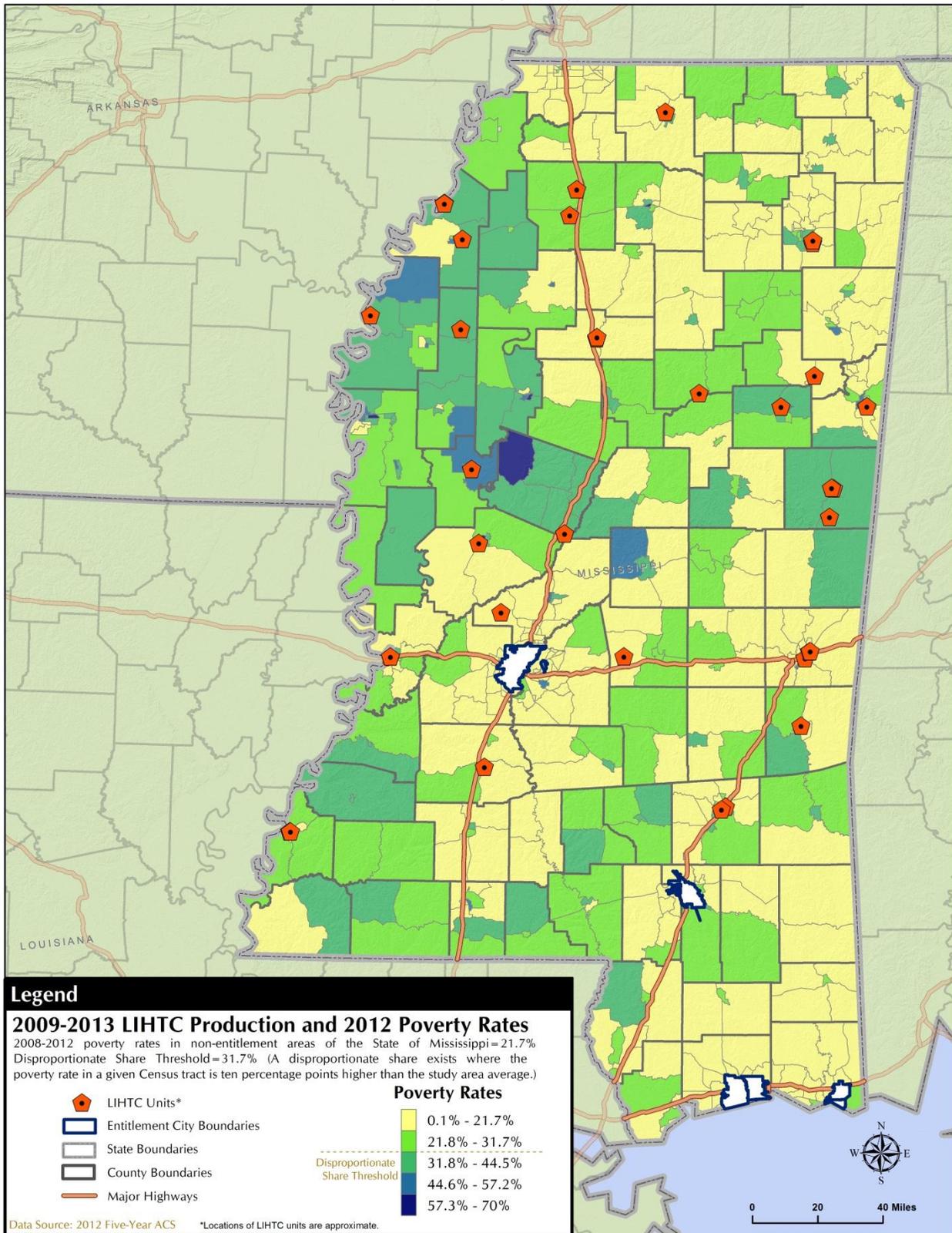
The distribution of housing projects participating in the LIHTC program is displayed in Map VI.3, on the following page. As had been the case with HUD-subsidized multifamily units, these units tended to be more numerous in the northern part of the state than the southern portion. There were several clusters of LIHTC projects in the state, notably in Tupelo, Meridian, and Laurel. Throughout the state, the locations of these units tended to correlate with areas having above-average and disproportionate shares of poverty.

POLICIES AND CODES

Information on municipal codes, ordinances, and other local policies were gathered through telephone interviews with officials from 41 non-entitlement communities in the State of Mississippi. Policies relating to housing development, special needs housing, and fair housing were addressed in order to evaluate the public sector environment for a variety of housing types, including affordable housing, mixed-use housing, senior housing, and group homes.

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. Some definitions of “dwelling” or “residential unit” can hinder the provision of housing for disabled or other special needs persons, and can inadvertently discriminate against boarding or care facilities. Most of the jurisdictions surveyed include definition of “dwelling unit” or “residential unit” in their housing codes, though four did not. In fifteen jurisdictions, the definition of these units included the phrase “for one family” or otherwise indicated that such units were intended for use by a “family”. Thirty-nine jurisdictions defined “family”, and 22 of the jurisdictions defined family along traditional lines—i.e., included the phrase “related by blood, marriage, or adoption”. The number of persons considered to be part of a family was limited by specific provisions of the housing codes of 16 jurisdictions, though more often there were no such limits.

Map VI.3
2013 Low-Income Housing Tax Credit (LIHTC) Units
 Non-Entitlement Areas of Mississippi
 2014 HUD LIHTC Database



Around 72 percent of the communities interviewed have codified specific guidelines allowing or encouraging the development of mixed-use housing, defined as buildings serving as a combination of residential, commercial, office, institutional, or “other use”. However, only 6 jurisdictions make any provisions to encourage the development of affordable housing, whether through inclusionary zoning or connections to funding or tax incentives. Six respondents also considered their jurisdiction to have complications in its zoning ordinances or codes that may hinder the development of low- to moderate-income housing. Several of those who felt that there were such barriers cited lot size restrictions and NIMBYism. Only one jurisdiction reported having residential occupancy standards or limits in local housing code.

Only eight of the communities define “disability” in their policies. In addition, nearly 90 percent of the jurisdictions included no development standards for making housing accessible to persons with disabilities. Twelve out of nineteen jurisdictions did not have a special administrative process by which persons with disabilities could request a variance for reasonable accommodations, apart from the standard appeals process. Similarly, only four included standards for the development of senior housing in their jurisdictional code, or policies that distinguish senior citizen housing from other residential uses. Finally, less than a third of the jurisdictions’ ordinances or codes include definitions of “group home” or “group housing”, and group homes are not permitted in single family residential areas in over a fifth of jurisdictions surveyed.

Only two of the jurisdictions included in the study have a fair housing ordinance, policy, or regulation. Eleven jurisdictions had no such a policy, and six respondents did not know whether or not such a policy was included in local ordinances. No jurisdiction reporting having any policies in place to affirmatively further fair housing.

FAIR HOUSING SURVEY – PUBLIC SECTOR RESULTS

As mentioned previously, further evaluation of the status of fair housing within State of Mississippi was conducted via an online 2014 Fair Housing Survey, which was completed by 256 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.1, below. As had been the case with questions concerning private sector barriers to fair housing choice, relatively few respondents were aware of any barriers to fair housing choice in any of the public sector contexts discussed. Note that any percentages reported in the following section represent the percentage of those who answered each question; missing responses are omitted from percentage calculations.

Table VI.1
Barriers to Fair Housing in the Public Sector

State of Mississippi
2014 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
Land use policies?	23	73	59	101	256
Zoning laws?	20	66	65	105	256
Occupancy standards or health and safety codes?	13	63	76	104	256
Property tax policies?	13	65	76	102	256
Permitting process?	12	68	74	102	256
Housing construction standards?	15	67	72	102	256
Neighborhood or community development policies?	13	65	73	105	256
Limited access to government services, such as employment services?	33	68	52	103	256
Public administrative actions or regulations?	14	64	77	101	256

Land Use Policies

When asked if they were aware of questionable practices or barriers to fair housing choice in land use policies, 23 respondents stated that they were aware of such barriers. Around 85 percent of respondents were unaware of any such barriers or selected “Don’t know” in response to this question. Commentary submitted with this question cited policies in local jurisdictions to limit the placement of multifamily housing units, or to bar them completely from the jurisdiction. According to several respondents, some local jurisdictions may also have policies in place that limit the type of housing units to owner-occupied units.

Zoning Laws

Zoning laws were also investigated as part of the survey. Twenty respondents noted awareness of barriers to fair housing choice due to zoning laws, or 13.3 percent of respondents, while around 87 percent of respondents claimed to be unaware of any such barriers or did not know well enough to respond. Again, commenters cited local policies that tend to limit housing options and housing locations for certain populations, including affordable housing residents and those with mental disabilities.

Occupancy Standards or Health and Safety Codes

Thirteen respondents, or 8.5 percent of those who answered this question, maintained that they were aware of barriers to fair housing choice or questionable practices in occupancy standards or health and safety codes. Those who provided additional commentary with this question acknowledged that housing standards are often poorly enforced, but maintain that financial and political constraints can hamper their enforcement.

Property Assessment and Tax Policies

Perception of barriers to fair housing choice in property assessment and tax policies was relatively limited; only 13 respondents were aware of any such barriers, representing 8.4 percent of those who answered the question.

Permitting Processes

There also relatively few respondents who professed to be aware of barriers to fair housing choice in the permitting process. Only 12 respondents, or 7.8 percent, were aware of such barriers, while over 90 percent of respondents were unaware of any such barriers.

Housing Construction Standards

Fifteen respondents claimed to have an awareness of barriers to fair housing policy in housing construction standards, representing about 9.7 percent of respondents who answered this question. Over 90 percent of those who answered the question were not aware of any barriers to fair housing choice in this context, or did not know well enough to respond. Those who provided additional commentary on this question focused on the confusing nature of federal accessibility requirements and the difficulties that builders have in complying with them.

Neighborhood or Community Development Policies

Thirteen respondents noted awareness of barriers to fair housing choice in neighborhood or community development policies, and commenters cited local policies that they perceive to have been enacted to limit the placement of multifamily homes. One commenter focused on proposed overlays in areas hit by recent tornados as a potential impediment to fair housing choice if they serve to bar construction of affordable housing units from the area.

Limited Access to Government Services

A question concerning barriers to fair housing choice in the provision of government services received a relatively high number of affirmative responses: 33 respondents, or about 21.6 percent of those who answered the question, maintained that they were aware of such barriers. A lack of adequate public transportation was cited by a relatively large number of respondents, many of whom claimed that current transit networks do not connect commuters to government services or job opportunities.

Any Other Public Administrative Actions or Regulations

Respondents were also asked to discuss their awareness of barriers to fair housing in any other public administrative actions or regulations. Fourteen respondents noted awareness of other issues, though over 90 percent of respondents were not aware of such barriers or did not know well enough to provide a response. Commentary submitted with this question touched on several themes, including a need for better customer service among public housing offices and a lack of coordination between local governments and Public Housing Authorities concerning the utilization of CDBG funding.

SUMMARY

Consideration of potential public sector barriers to fair housing choice included an analysis of the geographic distribution of subsidized, multifamily housing units as well as a discussion of local codes and policies and selected results from the 2014 State of Mississippi Fair Housing Survey. Survey questions included under this heading were designed to gauge the perceptions of stakeholders in non-entitlement areas of the state regarding potential barriers to fair housing in local policies, practices, and laws.

Geographic maps of multifamily assisted and Section 8 housing units administered through HUD and local Public Housing Authorities (PHAs) demonstrated that these units tended to be located in the north of the state, often clustered around major transportation corridors. Multifamily units funded through Low Income Housing Tax Credits tended to be located in areas with above average and disproportionate shares of poverty.

Analysis of public sector factors that have the potential to impact fair housing choice in the public sector included a survey of 41 land-use planners in non-entitlement areas of the state. The results of this survey suggest that local ordinances throughout non-entitlement areas of the state often lack provisions that may promote fair housing choice. For example, many jurisdictions lack provisions to promote development of affordable housing units or accessible construction.

Results from the 2014 Fair Housing Survey indicate a generally limited perception of barriers to fair housing choice in the public sector, though the perception that limited transportation networks represent a potential barrier to fair housing choice was relatively common. Commentary submitted with questions from the survey highlighted the perceived role of local policies in limiting the placement of affordable housing units.

SECTION VII. PUBLIC INVOLVEMENT

This section discusses analysis of fair housing in the State of Mississippi 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 2014 Fair Housing Survey comprised a large portion of the public involvement efforts associated with the development of the 2014 AI. While data from the survey regarding policies and practices within the private and public sectors have already been discussed, questions included to gauge and characterize public participation in the survey are discussed below.

The purpose of the 2014 Fair Housing Survey, a relatively qualitative component of the AI, was to gather insight into knowledge, experiences, opinions, and feelings of stakeholders and interested citizens regarding fair housing as well as to gauge the ability of informed and interested parties to understand and affirmatively further fair housing. Many organizations throughout the State were solicited to participate.

A total of 256 persons in the State of Mississippi completed the survey, which was conducted entirely online. A complete list of responses is included in Appendix B. Other survey results are also discussed in **Sections V and VI**.

Respondents of the 2014 Fair Housing Survey were asked to identify their primary role within the housing industry. As shown in Table VII.1, at right, 82 respondents identified themselves as homeowners, 34 as “Other”, 27 as property management professionals, 27 as renter/tenants, and 25 as local government officials.

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.2. As shown, 45 survey participants were not familiar with fair housing laws, while around 76 percent of those who answered this question indicated that they were “somewhat” or “very” familiar with fair housing laws.

Table VII.1
Role of Respondent

State of Mississippi
2014 Fair Housing Survey Data

Primary Role	Total
Homeowner	82
Other Role	34
Property Management	27
Renter/Tenant	27
Local Government	25
Construction/Development	15
Service Provider	14
Advocate/Service Provider	12
Banking/Finance	7
Real Estate	6
Law/Legal Services	4
Missing	3
Total	256

Table VII.2
How Familiar are you with
Fair Housing Laws?

State of Mississippi
 2014 Fair Housing Survey Data

Familiarity	Total
Not Familiar	45
Somewhat Familiar	84
Very Familiar	61
Missing	66
Total	256

Table VII.3, below, shows the responses to four questions regarding federal, state, and local fair housing laws. First, respondents were asked to indicate their perceptions of the usefulness of fair housing laws in their communities. As shown, 143 respondents indicated that they felt that fair housing laws are useful, while only 15 respondents maintained that fair housing laws are not useful.

Respondents were also asked if fair housing laws are difficult to understand or follow. Around half of the respondents stated that they were not difficult to follow, though over 34 percent of respondents felt that they were.

In response to a question concerning whether or not fair housing laws should be changed, 37 respondents, or just over one-fifth of those who answered the question, stated that fair housing laws should be changed. The most common proposed changes to fair housing laws involved the expansion of protected class status, particularly to include protections based on sexual orientation. Several respondents who submitted commentary with this question also noted a need for stronger enforcement of fair housing laws currently in effect, a perception that was borne out to some degree in responses to the following question.

Sixty respondents, or around one-third of those who answered this question, felt that such fair housing laws are not adequately enforced in the state, though just over half of respondents felt that such laws were adequately enforced.

Table VII.3
Federal, State, and Local Fair Housing Laws

State of Mississippi
 2014 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total
Do you think fair housing laws are useful?	143	15	30	68	256
Are fair housing laws difficult to understand or follow?	63	95	30	68	256
Do you think additional groups should be protected under the State fair housing law?	37	77	70	72	256
Do you think fair housing laws are adequately enforced?	101	60	20	75	256

The next section in the survey related to fair housing activities, including outreach and education and testing and enforcement. As shown on the following page in Table VII.4, when asked if there was a training process available to learn about fair housing laws, 101 respondents answered “yes”, and 91 respondents also noted that they had participated in fair housing training. The latter group represents 71.7 percent of respondents who answered this question. Respondents were also asked about their awareness of fair housing testing; 42

respondents indicated that they were aware of such activity, or about 23 percent of respondents.

Questions in this section also invited respondents to gauge the current levels of fair housing activities in their communities. Around 40 percent of those who answered the question, or 72 respondents, suggested that there is too little fair housing outreach and education activity in the State, while 44 respondents felt that outreach and education activities were sufficient. In terms of fair housing testing, 56 respondents maintained that current levels of testing are not sufficient, 25 claimed that they are sufficient, and only 4 thought that current levels of testing were excessive.

Table VII.4
Fair Housing Activities
State of Mississippi
2014 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total	
Is there a training process available to learn about fair housing laws?	101	60	20	75	256	
Have you participated in fair housing training?	91	29	7	129	256	
Are you aware of any fair housing testing?	42	111	29	74	256	
Testing and education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity?	72	44	5	60	75	256
Is there sufficient testing?	56	25	4	97	74	256

As part of the process of measuring understanding of fair housing law through the survey instrument, respondents were asked to list their awareness of classes of persons protected by fair housing laws on federal, state, and local levels. Race and disability were offered as examples of protected classes in the question narrative, and respondents were encouraged to continue on and list other protected classes.

Results of this question are presented at right in Table VII.5. Some respondents were able to correctly identify several of the protected classes, including religion, gender, family status, national origin, and color. However, many applicants incorrectly identified classes that are not protected under the federal Fair Housing Act. Such classes include age, identified by 39 respondents, and sexual orientation, identified by 32 respondents.

Table VII.5
Protected Classes
State of Mississippi
2014 Fair Housing Survey Data

Protected Class	Total
Gender	89
Religion	87
Family Status	77
National Origin	60
Age	39
Color	37
Sexual Orientation	32
Disability	11
Income	9
Race	6
Ethnicity	2
AIDS	2
Ancestry	1
Criminal History	1
Other	23
Total	482

Table VII.6, on the following page, presents tallied responses to survey questions related to the status of fair housing in the State of Mississippi. First, respondents were asked if they were aware of a fair housing plan in their communities. Twenty-five respondents stated that they were aware of such policies, while over 82 percent of respondents to this question stated that they were unaware of such policies or did not know.

Respondents were also asked to offer information regarding any specific geographic areas within the State that might be beset by fair housing issues. Twenty-eight respondents claimed to be aware of such areas, and rural lands were cited by a number of respondents as areas with a higher incidence of fair housing problems, in addition to the Delta Region and Madison.

Respondents were also asked to offer any additional comments that they might have regarding fair housing in their communities. Several respondents who provided commentary cited a need to promote a more widespread understanding of fair housing policy and cited particular instances of discrimination of which they were personally aware.

Table VII.6
Local Fair Housing
State of Mississippi
2014 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any city or county fair housing ordinance, regulation, or plan?	25	78	41	112	256
Are there any specific geographic areas that have fair housing problems?	28	30	86	112	256

FAIR HOUSING FORUMS AND PUBLIC INPUT MEETINGS

FAIR HOUSING FORUMS

Four fair housing forums were held in Mississippi as part of the AI process. These forums were held in Hattiesburg, Itta Bena, Jackson, and Tupelo in June 2014, and each forum included a presentation of analyses that had been conducted up to that point in connection with this AI effort. The purpose of the presentation and subsequent discussion was to provide the public with an opportunity to learn more about the AI process and why it was conducted and to share preliminary findings from the study. The complete minutes from the meeting are presented in Appendix C. Discussions at the forum covered a diverse set of topics, though there were several dominant themes. These themes include the following:

- The need to promote knowledge of fair housing laws and policies, and issues pertaining to fair housing more generally
- Difficulties stemming from the lack of a state-level fair housing law or agency
- The prevalence of exclusionary zoning as a practice that perpetuates housing discrimination

PLANNING AND DEVELOPMENT DISTRICT MEETINGS

In addition to these fair housing forums, three monthly meetings were held with the Mississippi Association of Planning and Development District (PDD) Outreach Committee. The first meeting was held on June 4, 2014, and the purpose of this meeting was to discuss the purpose of and preliminary findings from the AI, as well as to solicit further information and data from meeting attendees.

The second meeting was held on July 1, 2014, and the purpose of that meeting was to present the Committee with updated findings and a list of preliminary impediments, as well as to generate ideas of activities that the PDD's may undertake to assist with the AI effort and affirmatively further fair housing. Additional topics discussed at the meeting ranged from the current and potential role of the Mississippi Center for Justice in processing fair housing complaints, as well as the role of homebuyer education and classes in financial literacy as a potential vehicle for addressing differential rates of home loan denials and predatory lending.

The third meeting was held on July 29, 2014. The purpose of this meeting was again to present the Committee with updated findings and provide for a further discussion of identified impediments, as well as actions that may be taken to address those impediments and measurable criteria for those actions. This meeting included a discussion of avenues by which the PDD can promote greater participation in the AI process.

PUBLIC HOUSING AGENCY MEETINGS

Four monthly meetings were held with representatives of the Public Housing Agency (PHA) Outreach Committee. The first meeting was held on June 5, 2014, and the purpose of that meeting was to discuss the purpose of and preliminary findings from the AI, as well as to solicit further information from the PHAs and discuss information they may need.

The second meeting was held on July 2, 2014, and the purpose of this meeting was to present the Committee with updated findings from the AI and to discuss a list of preliminary impediments identified during the course of the AI. Discussion at this meeting touched on issues pertaining to the distribution of vouchers in the state, as well as the need for further education of housing providers and consumers.

A third meeting with representatives of the PHA Outreach Committee was held on July 30, 2014. The purpose of this meeting was to provide suggestions on actions that the PHAs might take to affirmatively further fair housing, potentially in concert with the state. The discussion at the meeting centered on the distribution of assisted housing in the state, and a potential certification scheme for voucher holders that might increase the value of their vouchers and allow them to move into areas with lower concentrations of poverty. The goal of such a program would be to promote the de-concentration of assisted housing in impoverished areas and areas with disproportionately high shares of minority residents.

Six final presentations are scheduled for August 2014. The first meeting will take place on Monday, August 11 at 4:00 PM in the Lexington Multi-Purpose Complex in Lexington. The second will take place on that same day at 7:00 PM in the Canton Multi-Purpose Complex in Canton. The third meeting is scheduled for 10:00 AM on August 12 in the J.W. Fore Municipal Building in Hollandale. The fourth meeting will take place in Clarksdale on that same day, at 3:00 PM in the Coahoma County Courthouse. The fifth and sixth meetings will both be held on the following day, August 13. The first meeting of the day will take place at 10:00 AM in the Matt Ross Administration Building in Port Gibson and the second will take place in the Jefferson County Multi-Purpose Building in Fayette at 3:00 PM.

Schedule of Public Forums

August 11, 2014 at 4:00 p.m.
Lexington Multi-Purpose Complex,
22521 Depot Street
Lexington, MS 39095
Phone: (662) 834-1261

August 12, 2014 at 3:00 p.m.
Coahoma County Courthouse
Board of Supervisor Boardroom
115 First Street
Clarksdale, MS 38614
(Phone: 662-624-3046)

August 11, 2014 at 7:00 p.m.
Canton Multi-Purpose Complex
501 Soldiers Colony Road
Canton, MS 39046
Phone: (601) 859-4358

August 13, 2014 at 10:00 a.m.
Matt Ross Administration Building
510 Market Street
Port Gibson, MS 39150
Phone: (601) 437-5216

August 12, 2014 at 10:00 a.m.
J.W. Fore Municipal Building
200 East Avenue South
Hollandale, MS 38748-0395
Phone: (662) 827-2241

August 13, 2014 at 3:00 p.m.
Jefferson County Multi-Purpose Building
678 Main St.
Fayette, MS 39069
(Phone: 601-786-0258)

SUMMARY

Efforts to promote and facilitate public involvement in the AI process included the 2014 Fair Housing Survey and Fair Housing Forums conducted in four cities in the State of Mississippi: Hattiesburg, Itta Bena, Jackson, and Tupelo, along with discussions with members of the MAPDD and PHA Outreach Committees. As of July, 256 residents of non-entitlement areas of Mississippi have completed the survey. Their responses suggest that residents are general familiar with, and supportive of fair housing efforts. Discussions at fair housing forums were wide-ranging and varied with the location, though there were some themes in common between the forum discussions. Participants at more than one forum highlighted a need for increase outreach and education on fair housing law and policy, as well as financial literacy, along with difficulties stemming from the lack of a state level fair housing law or policy and the prevalence of exclusionary zoning in local jurisdictions. In addition, a series of six public input meetings are scheduled for the middle of August, 2014. These meetings will be held in six different cities throughout the state.

SECTION VIII. SUMMARY OF FINDINGS

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

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

Socio-Economic Context

The population in non-entitlement areas of Mississippi grew by an estimated 6.8 percent between 2000 and 2013 and underwent several minor shifts during that time. In both the 2000 and 2010 Censuses, residents aged 35 to 54 years accounted for the largest share of the population; however, this share slipped by 0.9 percentage points over the decade and these residents represented 27.0 percent of the population in 2010. The two eldest cohorts, comprising residents between the ages of 55 and 64 and those aged 65 and older, grew more rapidly than the overall population between the Censuses. By 2010, these groups together accounted for a quarter of the population.

The racial composition of the state also changed, albeit slightly. White residents accounted for the largest share of residents in both years; though this share slipped by 1.8 percentage points between the two Censuses, white residents still accounted for 62.2 percent of all residents in 2010. By contrast, the Hispanic population more than doubled over the decade, though these residents still only accounted for 2.6 percent of the population in 2010.

Residents with disabilities accounted for 23.6 percent of the population in 2000. In that year, residents with disabilities were disproportionately concentrated in a large Census tract to the east of Jackson. By 2012, 16.5 percent of the population was observed to be living with disabilities, though due to changes in the ACS and Census questionnaires in 2008, it is impossible to conclude with certainty that the share of disabled residents actually declined.

The number of workers employed in non-entitlement areas of Mississippi has fluctuated considerably since 2000, when the number of employed persons peaked at over 1,072,000. The number of employed workers dropped by nearly 50,000 in 2009, though it began to steadily increase after that year. Employment fell again in 2013, though because the size of the labor force contracted along with it, the unemployment rate continued to decline. As had been the case in the labor market, the unemployment rate fluctuated considerably after 2000. Rapid growth in the unemployment rate continued through 2010, but began to fall after that year, and has continued to fall through 2013. The labor market decline of the late 2000s was also reflected in a drop in the number of full- and part-time jobs in the state, which continued through 2010.

In contrast to trends in the labor market, the amount that the average resident earned at his or her jobs grew steadily through the 1990s in real dollars. However, growth in earnings largely stopped after 2004 and held steady at around \$41,000 per year for approximately 6 years. However, in 2012 earnings ticked up to \$42,812. Growth in real per capita income has been even steadier over the same period, and has uniformly positive since 1982, with the exception of a brief decline in 2009. Accordingly, household incomes rose between 2000 and 2012 as the share of households in all income groups below \$50,000 per year fell and the share of households in higher income groups rose. In spite of this shift in household incomes, the poverty rate rose by 2 percentage points between 2000 and 2012.

The composition of the housing stock in non-entitlement areas also shifted as growth in the number of housing units outpaced growth in the population. Though the number of occupied housing units increased by 8.5 percent these units declined as a share of the overall housing stock as the number of vacant units grew by 35.3 percent. There was a shift toward rental tenancy over the decade as the share of renter-occupied units grew over the share of owner-occupied units. Growth in the number of vacant units for rent accounted for a substantial portion of the increase in vacant units overall, along with the considerable growth in the number of “other vacant” units.

The average household size in non-entitlement areas of Mississippi appears to have changed very little between the 2000 and 2010 Censuses. However, there was marked shift away from medium sized households and toward larger and smaller households over the period. In addition, the shares of single-family units and apartments grew between 2000 and 2012, while the share of mobile homes and multiplexes fell. Fewer housing units were overcrowded by 2012, and fewer units had incomplete plumbing facilities. However, the share of units lacking complete kitchen facilities grew from 0.7 to 0.9 percent between 2000 and 2012.

Five-Year ACS estimates from 2012 indicate that tracts with relatively high median contract rent prices tended to be clustered around urban areas of the state; including Jackson and the coastal cities, as well as in the part of the Memphis, Tennessee suburbs that fell within the Mississippi border. Tracts with relatively high median home values tended to be concentrated in these same areas, as well as in Census tracts in and around Oxford and Starkville.

Fair Housing Law, Study, and Case Review

Mississippi residents are protected from discrimination in the housing market by the Federal Fair Housing Act, which recognizes race, color, national origin, religion, religion, sex, familial

status, and disability as protected classes. In spite of these protections, national fair housing studies demonstrated the persistence of illegal discrimination in the housing market, though they also suggest that discrimination has become more subtle and difficult to identify.

The Department of Justice has lodged six complaints against housing providers in the State of Mississippi in the last five years. In three of these complaints, housing providers were alleged to have discriminated against Mississippi residents on the basis of familial status. Two complaints included allegations of discrimination on the basis of disability, and one complaint cited alleged racial discrimination.

Fair Housing Structure

Residents of non-entitlement areas of Mississippi who believe that they have been subjected to illegal discrimination in the housing market can lodge a complaint with the Department of Housing and Urban Development (HUD). HUD conducts complaint intake, investigation, and judges whether or not there is reasonable cause to believe that a fair housing complaint represents a genuine case of discrimination in the housing market. HUD may also resolve complaints found to be with cause through an administrative hearing, though many complainants elect to pursue their claims in a federal civil action. In such cases, HUD refers the complaint to the Department of Justice.

Since the beginning of 2014, the Mississippi Center for Justice has served residents of the State of Mississippi as a participant in HUD's FHIP program. The Center conducts complaint intake and processing for HUD in addition to a variety of services that it provides in furtherance of its commitment to advance racial and economic justice.

Fair Housing in the Private Sector

Private sector data that may suggest the presence of barriers to fair housing choice include data that detail patterns of lending and investment, fair housing complaints, and public perception of conditions in the housing market. Data collected through the Home Mortgage Disclosure Act (HMDA) reveal that 193,718 home purchase loans were originated in non-entitlement areas of Mississippi from 2004 through 2012, and 84,435 were denied, for an average denial rate of 30.4 percent. Black residents, Hispanic residents, and women were denied loans at a considerably higher rate than the average; in the case of racial and ethnic minorities, these discrepancies held even when income was taken into account. Similarly, black and Hispanic borrowers were issued predatory style loans at a higher rate than white and Hispanic borrowers, as well as the overall average rate of 24.7 percent.

Analysis of data collected under the Community Reinvestment Act (CRA) provides for an overall portrait of the distribution of loans and loan dollars in non-entitlement areas of the state. Though such loans are intended to promote economic development in low- and medium-income areas, they were more frequently issued in Census tracts in which the median income was greater than 80.1 percent of the median family income of the counties in which those Census tracts were located. These Census tracts tended to be located in and around urban areas of the state; notably Jackson, Hattiesburg, Columbus, Tupelo, and Oxford. Rural Census tracts in the East Central and Delta regions tended to receive less in the way of loans and loan dollars.

A substantial number of Mississippi residents who lodged housing discrimination complaints with HUD alleged that housing providers had discriminated against them on the basis of race. Alleged discrimination on this basis was cited in 192 of the 329 complaints lodged with HUD between 2004 and 2014, followed by disability and sex, cited in 126 and 73 complaints, respectively. Familial status figured in 60 complaints lodged with HUD over the same period. The largest share of complainants cited “discrimination in terms, conditions, or privileges relating to rental”, and “discriminatory refusal to rent” was also frequently cited.

Results from the Private Sector section of the 2014 Fair Housing Survey revealed that a majority of respondents typically were not aware of any barriers to fair housing choice in any of the industries or institutions mentioned, or did not know enough to weigh in on these questions. Perceived discrimination in rental housing was the most salient form of discrimination among survey respondents: more than a fifth of respondents claimed to be aware of housing discrimination in this area. In commentary submitted with the survey questions, perceived redlining on the part of housing providers and financiers was common. Many commenters also cited perceived discrimination on the bases of race, disability, and familial status.

Fair Housing in the Public Sector

Consideration of potential public sector barriers to fair housing choice included an analysis of the geographic distribution of subsidized, multifamily housing units as well as a discussion of local codes and policies and selected results from the 2014 State of Mississippi Fair Housing Survey. Survey questions included under this heading were designed to gauge the perceptions of stakeholders in non-entitlement areas of the state regarding potential barriers to fair housing in local policies, practices, and laws.

Geographic maps of multifamily assisted and Section 8 housing units administered through HUD and local Public Housing Authorities (PHAs) demonstrated that these units tended to be located in the north of the state, often clustered around major transportation corridors. Multifamily units funded through Low Income Housing Tax Credits tended to be located in areas with above average and disproportionate shares of poverty.

Analysis of public sector factors that have the potential to impact fair housing choice in the public sector included a survey of 41 land-use planners in non-entitlement areas of the state. The results of this survey suggest that local ordinances throughout non-entitlement areas of the state often lack provisions that may promote fair housing choice. For example, many jurisdictions lack provisions to promote development of affordable housing units or accessible construction.

Results from the 2014 Fair Housing Survey indicate a generally limited perception of barriers to fair housing choice in the public sector, though the perception that limited transportation networks represent a potential barrier to fair housing choice was relatively common. Commentary submitted with questions from the survey highlighted the perceived role of local policies in limiting the placement of affordable housing units.

Public Involvement

Efforts to promote and facilitate public involvement in the AI process included the 2014 Fair Housing Survey and Fair Housing Forums conducted in four cities in the State of Mississippi: Hattiesburg, Itta Bena, Jackson, and Tupelo, along with discussions with members of the MAPDD and PHA Outreach Committees. As of July, 256 residents of non-entitlement areas of Mississippi have completed the survey. Their responses suggest that residents are general familiar with, and supportive of fair housing efforts. Discussions at fair housing forums were wide-ranging and varied with the location, though there were some themes in common between the forum discussions. Participants at more than one forum highlighted a need for increase outreach and education on fair housing law and policy, as well as financial literacy, along with difficulties stemming from the lack of a state level fair housing law or policy and the prevalence of exclusionary zoning in local jurisdictions. In addition, a series of six public input meetings are scheduled for the middle of August, 2014. These meetings will be held in six different cities throughout the state.

Schedule of Public Forums

August 11, 2014 at 4:00 p.m.
Lexington Multi-Purpose Complex,
22521 Depot Street
Lexington, MS 39095
Phone: (662) 834-1261

August 12, 2014 at 3:00 p.m.
Coahoma County Courthouse
Board of Supervisor Boardroom
115 First Street
Clarksdale, MS 38614
(Phone: 662-624-3046)

August 11, 2014 at 7:00 p.m.
Canton Multi-Purpose Complex
501 Soldiers Colony Road
Canton, MS 39046
Phone: (601) 859-4358

August 13, 2014 at 10:00 a.m.
Matt Ross Administration Building
510 Market Street
Port Gibson, MS 39150
Phone: (601) 437-5216

August 12, 2014 at 10:00 a.m.
J.W. Fore Municipal Building
200 East Avenue South
Hollandale, MS 38748-0395
Phone: (662) 827-2241

August 13, 2014 at 3:00 p.m.
Jefferson County Multi-Purpose Building
678 Main St.
Fayette, MS 39069
(Phone: 601-786-0258)

SECTION IX. IMPEDIMENTS AND SUGGESTED ACTIONS

IMPEDIMENTS TO FAIR HOUSING CHOICE AND SUGGESTED ACTIONS

Private Sector Impediments, Suggested Actions, and Measurable Objectives

Impediment 1: More frequent denial of home purchase loans to Black, Hispanic, and female applicants: The perception that black, Hispanic, and female applicants found it more difficult to secure a home loan was cited by a number of survey respondents. This impression was shared by participants in fair housing forum discussion, and the perception was borne out in an analysis of home loan denials in non-entitlement areas of the state. Just over 30 percent of loan applications were denied to all applicants, but when those applicants were black the denial rate climbed to 45.2 percent. Hispanic applicants were denied 34.6 percent of the time, compared to a 28.4 percent denial rate for non-Hispanic applicants. Likewise, 36.1 percent of home loan applications from female applicants were denied, while 26.6 of applications from male applicants were denied.

Action 1.1: Educate buyers through credit counseling and home purchase training
Measurable Objective 1.1: Number of outreach and education activities conducted

Impediment 2: Predatory style lending falls more heavily on black borrowers: This impediment was identified in review of home loan data collected under the Home Mortgage Disclosure Act and in results of the 2014 Fair Housing Survey. Predatory style lending refers to loans with high annual percentage rates (HALs).⁵⁹ While 24.7 percent of those who took out a home loan were issued a loan that was predatory in nature, the percentages of HALs to black and Hispanic borrowers were 38.7 and 27.3 percent, respectively.

Action 2.1: Educate buyers through credit counseling and home purchase training
Measurable Objective 2.1: Increase number of outreach and education activities conducted

Impediment 3: Discriminatory terms and conditions and refusal to rent: This impediment was identified through review of the results of the fair housing survey, the fair housing forum discussion in Hattiesburg, and fair housing studies profiled in the literature review. Perception of discriminatory refusal to rent was relatively common among survey respondents, who cited race as the basis for this perceived discrimination. In addition, discrimination was identified as more common in the rental industry during the fair housing forum in Hattiesburg, and national fair housing studies focus on the persistence of discrimination in the rental housing industry.

Action 3.1: Enhance testing and enforcement activities and document the outcomes of enforcement actions
Measurable Objective 3.1: Increase number of testing and enforcement activities conducted
Action 3.2: Continue to educate landlords and property management companies about fair housing law

⁵⁹ See **Section V** for a more complete discussion of HALs.

Measurable Objective 3.2: Increase number of outreach and education activities conducted

Action 3.3: Continue to educate housing consumers in fair housing rights

Measurable Objective 3.3: Increase number of outreach and education activities conducted

Impediment 4: Failure to make reasonable accommodation or modification: Discrimination on the basis of disability was one of the most common complaints that HUD received from Mississippi from 2004 through the beginning of 2014, and the refusal on the part of housing providers to make a reasonable accommodation for residents with disabilities was a relatively common accusation. Fair housing forum discussions turned at points to the difficulties that persons with disabilities face in convincing landlords to allow reasonable modifications or in finding accessible apartments, as well as to the difficulties that those in construction and property management face in interpreting accessibility requirements. These concerns were also reflected in commentary submitted with the fair housing survey. Finally, two of the six DOJ complaints filed against Mississippi housing providers in the last five years alleged discrimination on the basis of disability.

Action 4.1: Enhance testing and enforcement activities and document the outcomes of enforcement actions

Measurable Objective 4.1: Increase number of testing and enforcement activities conducted

Action 4.2: Educate housing providers about requirements for reasonable accommodation or modification

Measurable Objective 4.2: Increase number of training sessions conducted

Action 4.3: Conduct audit testing on newly constructed residential units

Measurable Objective 4.3: Number of audit tests completed

Public Sector Impediments, Suggested Actions, and Measurable Objectives

Impediment 1: Insufficient understanding of fair housing laws: This impediment was identified through a review of the fair housing survey and the minutes taken at the four fair housing forums. Survey respondents and forum participants alike continually cited a need for more education of fair housing law and policies, as well as the types of actions that could constitute unlawful violations of the Fair Housing Act. In addition, results from the fair housing survey indicate some confusion among respondents on several matters relating to fair housing policy, including the extent of protections offered under the Fair Housing Act. Finally, nearly a quarter of fair housing survey respondents who reported their level of awareness of fair housing laws professed to know “very little” about such laws.

Action 1.1: Conduct outreach and education to the public for several perspectives related to fair housing

Measurable Objective 1.1: The number of outreach and education actions taken in regard to the value of having housing available to all income groups in the state, thereby encouraging neighborhoods to be more willing to accept assisted housing facilities

Measurable Objective 1.2: Participate in sponsorship or co-sponsorship of public meetings during April, Fair Housing Month

Measurable Objective 1.3: Request on a periodic basis fair housing complaint data from the Mississippi Center for Justice and HUD and publish this information to teach others about fair housing

Impediment 2: Insufficient fair housing testing and enforcement in non-entitlement areas of Mississippi: This impediment was identified in the results of the 2014 Fair Housing Survey. Of those who answered the survey question concerning awareness of fair housing testing, only about a fifth were aware of any such testing. Furthermore, a majority of respondents who registered their opinion on current levels of fair housing testing thought that they were insufficient.

Action 2.1: Initiate an inventory of Fair Housing Initiative Program (FHIP) grantees or prospective grantees in Mississippi

Measurable Objective 2.1: Compile the inventory

Measurable Objective 2.2: Conduct outreach and exploratory discussions with FHIP entities who might be able to perform testing and enforcement activities in the State

Action 2.2: Number of contacts made with FHIP entities

Impediment 3: Fair Housing Infrastructure largely lacking: This impediment was identified through review of the fair housing structure as well as the minutes from the Hattiesburg Fair Housing Forum. There is no state level agency that is charged with enforcing fair housing law in the state, just as there is no fair housing statute at the state level. The lack of such an agency, and the difficulties this presents for affirmatively furthering fair housing, were a dominant theme in the Hattiesburg Fair Housing Forum.

Action 3.1: Initiate an inventory of Fair Housing Initiative Program (FHIP) grantees or prospective grantees in Mississippi

Measurable Objective 3.1: Compile the inventory

Measurable Objective 3.2: Conduct outreach and exploratory discussions with FHIP entities who might be able to work in Mississippi

Action 3.2: Number of contacts made with FHIP entities

Impediment 4: Lack of understanding of the fair housing duties: Just as housing consumers are often unaware and uninformed of their rights under the Fair Housing Act, housing providers can be unaware of their responsibilities under the Act. This lack of awareness often manifests itself as an unwillingness to make reasonable accommodations for residents with disabilities, though it can appear in other actions and omissions on the part of housing providers. The presence of this impediment was identified through review of the minutes of the fair housing forum and the results of the fair housing survey.

Action 4.1: Promote the Analysis of Impediments and Fair Action Housing Plans during Fair Housing Month in April

Measurable Objective 4.1: Actions taken to promote fair housing month and the Analysis of Impediments to Fair Housing Choice

Action 4.2: Hold quarterly meetings to promote public understanding of fair housing, affirmatively furthering fair housing, and key issues in lending

Measurable Objective 4.1: Number of meetings held

Impediment 5: Overconcentration of vouchers, assisted housing, and lower-income housing in selected areas of the State. Geographic maps prepared that show the geographic dispersion of such housing is concentrated in selected non-entitlement areas of the State. Further analysis demonstrates that there is some correlation between locations of such housing and concentrations of poverty.

Action 5.1: Add additional criteria to assisted housing location and other investment decisions

Measurable Objective 5.1: Determine the additional criteria, such as concentration of poverty or concentration of racial or ethnic minority, and incorporate this in the decision process

Measurable Objective 5.2: Evaluate the implications of redevelopment and other investments in areas with high rates of poverty and/or higher concentrations of racial and ethnic minorities

Action 5.2: Facilitate the creation of certification classes for a small set of voucher holders so that they may qualify for enhanced value vouchers, a voucher that pays slightly higher than other vouchers

Measurable Objective 5.2: Facilitate education of prospective landlords about the qualities of certified holders of Housing Choice Voucher tenants

Action 5.3: Increase voucher use in moderate income neighborhoods

Measurable Objective 5.3: Facilitate education of prospective landlords about the qualities of Housing Choice Voucher

Action 5.4: In concert with Mississippi PHAs, open dialogue with HUD concerning elements of PHA operational and program requirements that may contribute to over-concentrations of assisted units in areas with high poverty rates and high concentrations of racial and ethnic minorities

Measurable Objective 5.4: Number of attempts to open dialogue, notes and recordings of meetings, recordings and notes about which changes can effect positive change to affirmatively further fair housing

SECTION X. FAIR HOUSING ACTION PLAN

The Community Services Division of the Mississippi Development Authority has developed a series of action steps that will be taken to address the impediments identified in the previous section. Though the MDA will take the lead in the implementation of these policies, it plans to do so through partnerships with statewide and local agencies that include Housing Education and Economic Development (HEED) and local Public Housing Agencies (PHA), as well as local and regional fair housing organizations. Action plan items pertaining to the private sector impediments are included in the first table, which begins on the following page. Actions designed to address public sector impediments are outlined in the second table, which begins on page 141.

Mississippi Development Authority

Community Services Division

2015-2018 FAIR HOUSING AND AFFIRMATIVELY FURTHERING FAIR HOUSING OUTREACH PLAN

Private Sector Impediments	Action Plan	Action Steps	Measurable Objective	Responsible Agency	Timeline
<p>1. More frequent denial of home purchase loans to Black, Hispanic, and Female Applicants</p> <p>Goal: Increase homeownership opportunities among minorities and lower income households</p>	<p>1.1. Educate buyer through credit counseling and home purchase training</p>	<p>MDA will ensure and monitor non-profit homebuyers grantees provide counseling and training to prospective homebuyers;</p> <p>MDA will continue to sponsor the HEED Fair housing and Fair Lending Conference annually; and seek to identify other fair housing organizations to provide additional fair housing educational services.</p> <p>MDA will conduct outreach to realtors, lenders and related associations and will seek to provide homebuyer training and workshops at various time frames throughout the calendar year and increase awareness during April – Fair Housing month;</p>	<p>1.1 Number of outreach and education activities conducted</p>	<p>MDA</p>	<p>All outreach activities will be conducted quarterly and/or bi-annually with an annual update of accomplishments</p> <p>Additional activities will be conducted as additional outreach opportunities become available.</p>

		<p>MDA will provide Fair Housing outreach by utilizing newspapers of general circulation and Minority owned newspapers, electronic and social media applications.</p> <p>MDA will ensure that Local Units of Government and other non-profit grantees conduct fair housing activities as part of their certification to affirmatively further fair housing and program requirements.</p>			
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Private Sector Impediments	Action Plan	Action Steps	Measurable Objective	Responsible Agency	Timeline
<p>2. Predatory style lending falls more heavily on black borrowers</p> <p>Goal: Implement and sponsor credit repair and homebuyer training to decrease the predatory practices and disparities in lending</p>	<p>2.1 Educate buyers through credit counseling and home purchase training</p>	<p>MDA will seek to provide homebuyer training and conduct workshops in partnership with non-profit housing organizations;</p> <p>MDA will conduct outreach to MS Banking Associations and lenders thru non-profit homebuyer grantees and MDA coordinated trainings;</p> <p>Provide Fair Housing outreach newspapers of general circulation and Minority owned newspapers and electronic and social media applications;</p>	<p>2.1 Increase number of outreach and education activities conducted</p>	<p>MDA</p>	<p>All outreach activities will be conducted quarterly and/or bi-annually with an annual update of accomplishments</p> <p>Additional activities will be conducted as additional outreach opportunities become available.</p>

Private Sector Impediments	Action Plan	Action Steps	Measurable Objective	Responsible Agency	Timeline
<p>3. Discriminatory terms and conditions and refusal to rent</p> <p>Goal: Implement and sponsor fair housing education and outreach trainings and conferences and research analysis to reduce housing discrimination</p>	<p>3.1 Enhance testing and enforcement activities and document the outcomes of enforcement actions</p> <p>3.2 Continue to educate landlords and property management companies about Fair Housing Laws</p> <p>3.3 Continue to educate housing consumers in Fair Housing rights</p>	<p>MDA will partner with a non-profit fair housing organizations to enhance testing and enforcement activities;</p> <p>MDA will provide landlord tenant education information to local units of government and provide education outreach information at schedule trainings and workshops;</p> <p>MDA will continue to sponsor the HEED Fair housing and Fair Lending Conference annually;</p> <p>MDA will seek to provide homebuyer training and workshops during April – Fair Housing month and at additional trainings;</p> <p>Provide Fair Housing outreach in newspapers of general circulation and Minority owned newspapers and electronic and social media applications;</p>	<p>3.1 Increase number of testing and enforcement activities conducted</p> <p>3.2 Increase number of outreach and educational activities conducted</p> <p>3.3 Increase number of outreach and educational activities conducted</p>	<p>MDA</p>	<p>All outreach activities will be conducted quarterly and/or bi-annually with an annual update of accomplishments</p> <p>Additional activities will be conducted as additional outreach opportunities become available.</p>

Private Sector Impediments	Action Plan	Action Steps	Measurable Objective	Responsible Agency	Timeline
<p>4. Failure to make reasonable accommodation or modification.</p> <p>Goal: Increase the availability of accessible, affordable housing throughout the State</p>	<p>4.1 Enhance testing and enforcement activities and document outcomes of enforcement activities</p> <p>4.2 Educate housing providers about requirements for reasonable accommodation or modification</p> <p>4.3 Conduct audit testing on newly constructed residential units</p>	<p>MDA will work thru non-profit grantees in educating contractors of reasonable accommodation requirements;</p> <p>MDA will seek to provide 1st accessible training to grantee and at various workshop across the state;</p> <p>MDA will work thru a non-profit or seek ways as an agency to effectively conduct audit testing on newly constructed residential units;</p>	<p>4.1 Increase number of testing and enforcement activities conducted</p> <p>4.2 Increase number of training sessions conducted</p> <p>4.3 Number of audit tests completed</p>	<p>MDA</p>	<p>All outreach activities will be conducted quarterly and/or bi-annually with an annual update of accomplishments</p> <p>Additional activities will be conducted as additional outreach opportunities become available.</p>

Mississippi Development Authority

Community Services Division

2015- 2018 FAIR HOUSING AND AFFIRMATIVELY FURTHERING FAIR HOUSING OUTREACH PLAN

Public Sector Impediments	Action Plan	Action Steps	Measurable Objective	Responsible Agency	Timeline
<p>1. Insufficient understanding of Fair Housing Laws.</p> <p>Goal: Increase and enhance fair housing outreach and education efforts throughout the State</p>	<p>1.1 Conduct outreach and education to the public for several perspectives related to fair housing</p>	<p>MDA will continue to sponsor the HEED Fair housing and Fair Lending Conference annually; and seek to identify other fair housing organizations to provide additional services</p> <p>MDA will conduct outreach to realtors, lenders and related associations as an agency</p> <p>MDA will seek conduct fair housing workshops and trainings at time frames throughout the calendar year and increase awareness during April – Fair Housing month;</p> <p>Provide Fair Housing outreach in newspapers of general circulation and Minority owned newspapers, electronic and social media applications.</p> <p>Ensure Local Units of Government and other non-profit grantees conduct fair housing activities as part of their certification to affirmatively further fair housing and program requirements.</p>	<p>1.1 Number of outreach and education activities conducted</p> <p>1.2 Sponsor and or Partner public meetings during Fair Housing Month (April)</p> <p>1.3 Request and publish fair housing complaint data.</p>	<p>MDA</p>	<p>All outreach activities will be conducted quarterly and/or bi-annually with an annual update of accomplishments.</p> <p>Additional activities will be conducted as additional outreach opportunities become available</p>

Public Sector Impediments	Action Plan	Action Steps	Measurable Objective	Responsible Agency	Timeline
<p>2. Insufficient Fair Housing testing and enforcement in non-entitlement areas.</p> <p>Goal: Provide testing and enforcement activities in communities where discrimination has been shown to be particularly high and to determine if discriminatory practices are occurring</p>	<p>2.1 Identify an inventory of Fair Housing initiative Program (FHIP) grantees</p> <p>2.2 Collaborate with identified FHIPs</p>	<p>MDA will seek to identify additional FHIPs and other non-profit agencies to partner with to conduct fair housing testing and enforcements</p> <p>Ensure Local Units of Government grantees conduct fair housing activities as part of their certification to affirmatively further fair housing and program requirements.</p>	<p>2.1 Compile the inventory</p> <p>2.2 Conduct outreach and exploratory discussions with FHIP to perform testing and enforcement</p>	<p>MDA</p>	<p>All outreach activities will be conducted quarterly and/or bi-annually with an annual update of accomplishments</p> <p>Additional activities will be conducted as additional outreach opportunities become available</p>
<p>3. Fair Housing Infrastructure largely lacking.</p> <p>Goal: Identify Fair Housing entities and resources to provide infrastructure</p>	<p>3.1 Enhance testing and enforcement activities and document the outcomes of enforcement actions</p> <p>3.2 Continue to educate landlords and property management companies about Fair Housing Laws</p> <p>3.3 Continue to educate housing consumers in Fair Housing rights</p>	<p>MDA will seek to identify additional FHIPs and other non-profit agencies to partner with to conduct fair housing testing and enforcements;</p> <p>MDA will work to partner with non-profit agencies, PHA's and local units of government to identify private and public property management companies to conduct landlord tenant education and outreach training and workshops;</p> <p>MDA will ensure Local Units of Government grantees conduct fair housing activities as part of their certification to affirmatively further fair housing and program requirements.</p>	<p>3.1 Increase number of testing and enforcement activities conducted</p> <p>3.2 Increase number of outreach and educational activities conducted</p> <p>3.3 Increase number of outreach and educational activities conducted</p>	<p>MDA</p>	<p>All outreach activities will be conducted quarterly and/or bi-annually with an annual update of accomplishments</p> <p>Additional activities will be conducted as additional outreach opportunities become available</p>

Public Sector Impediments	Action Plan	Action Steps	Measurable Objective	Responsible Agency	Timeline
<p>4: Lack of understanding of fair housing duties.</p> <p>Goal: Provide and ensure grantees, landlords, housing providers, real estate agents, property managers, lenders, housing authority staff, and non-profit housing staff with fair housing education, responsibilities, and clearly defined roles</p>	<p>4.1 Promote the Analysis of Impediments and Fair Housing Action Plans during Fair Housing Month (April)</p> <p>4.2 Sponsor/Partner quarterly Fair Housing trainings/ meetings</p>	<p>MDA will promote the AI at all workshops and meeting and seek to increase the awareness of the AI during April- Fair Housing Month;</p> <p>MDA will work with partners to provide quarterly and annually fair housing meetings and trainings;</p> <p>Ensure Local Units of Government and other non-profit grantees conduct fair housing activities as part of their certification to affirmatively further fair housing and program requirements;</p> <p>MDA will work to partner with non-profit agencies, PHA's and grantee to identify private and public property management companies to conduct landlord tenant education and outreach training and workshops;</p>	<p>4.1 Activities conducted to promote Fair Housing Month and AI</p> <p>4.2 Number of trainings/meetings held</p>	<p>MDA</p>	<p>All outreach activities will be conducted quarterly and/or bi-annually with an annual update of accomplishments</p> <p>Additional activities will be conducted as additional outreach opportunities become available</p>
<p>5: Overconcentration of vouchers, assisted housing, and lower-income housing in selected areas of the State</p> <p>Goal: Educate the public about the value</p>	<p>5.1 Add additional criteria to assisted housing locations and other investment decisions</p> <p>5.2 Create certification</p>	<p>MDA will work to coordinate and facilitate outreach opportunities with PHA and HUD to discuss the action plan for these impediments.</p>	<p>5.1: Determine the additional criteria, such as concentration of poverty or concentration of racial or ethnic minority, and incorporate this in the decision process</p>	<p>MDA will work as a facilitator in partnership the PHA's to address this identified impediment.</p>	<p>This will be an ongoing activity and schedule for the various organizations involved are determined.</p> <p>Additional activities will be conducted as additional outreach opportunities become</p>

<p>of affordable housing and the importance of strategies to increase diversity in the housing market.</p>	<p>program/classes for select voucher holders that provide a slightly higher value</p> <p>5.3 Increase voucher use in moderate income neighborhoods</p> <p>5.4 Collaborate with PHAs regarding voucher program guidelines and requirements</p>		<p>5.2 Evaluate the implications of redevelopment and other investments in areas with high rates of poverty and/or higher concentrations of racial and ethnic minorities</p> <p>5.3 Facilitate education of prospective landlords about the qualities of certified holders of Housing Choice Voucher tenants</p> <p>5.4 Facilitate education of prospective landlords about the qualities of Housing Choice Voucher</p> <p>5.5 Number of attempts to open dialogue, notes and recordings of meetings, recordings and notes about which changes can effect positive change to affirmatively further fair housing</p>		<p>available</p>
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SECTION XI. 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. General Accounting Office

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

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

HMDA: Home Mortgage Disclosure Act

HOME: HOME Investment Partnerships

HOPWA: Housing Opportunities for Persons with AIDS

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

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

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

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

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

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

MFI: Median family income

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

MSA: Metropolitan Statistical Area

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

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

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

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

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

1. If they are HOEPA loans;⁶¹
2. Lien status, such as whether secured by a first lien, a subordinate lien, not secured by a lien, or not applicable (purchased loans); and
3. Presence of HALs. For full definition, see **HAL**.

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

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

Protected Class: Group of people protected from discrimination and harassment. Mississippi 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.

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 Mississippi Analysis of Impediments to Fair Housing Choice.

A. COMMUNITY REINVESTMENT ACT DATA

Table A.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI

Non-Entitlement Area of Mississippi
2000–2012 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	1,458	5,485	32,882	16,337	0	56,162
2001	1,507	6,040	33,277	16,001	0	56,825
2002	1,475	6,687	35,550	16,609	0	60,321
2003	764	7,190	35,375	15,167	0	58,496
2004	835	7,868	33,398	16,134	0	58,235
2005	739	5,277	26,030	14,377	0	46,423
2006	928	7,100	33,428	19,361	0	60,817
2007	865	7,280	35,329	20,405	0	63,879
2008	1,313	5,494	26,874	15,837	0	49,518
2009	503	2,747	13,532	7,856	0	24,638
2010	320	2,532	12,382	7,062	0	22,296
2011	367	2,766	13,522	7,847	0	24,502
2012	396	3,571	12,691	9,801	13	26,472
Total	11,470	70,037	344,270	182,794	13	608,584
Loan Amount (\$1,000s)						
2000	26,785	92,341	525,262	303,621	0	948,009
2001	28,662	104,638	562,706	308,710	0	1,004,716
2002	26,614	115,020	585,476	299,271	0	1,026,381
2003	13,167	125,847	587,805	267,894	0	994,713
2004	13,793	132,398	554,687	287,442	0	988,320
2005	11,943	77,413	408,077	233,204	0	730,637
2006	10,490	82,554	413,919	249,289	0	756,252
2007	11,356	83,892	429,656	262,940	0	787,844
2008	14,615	73,031	357,789	223,129	0	668,564
2009	8,333	47,650	240,356	146,111	0	442,450
2010	6,740	44,008	217,892	129,481	0	398,121
2011	7,526	44,649	231,832	136,088	0	420,095
2012	5,783	55,627	189,269	153,174	313	404,166
Total	185,807	1,079,068	5,304,726	3,000,354	313	9,570,268

Table A.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 Non-Entitlement Area of Mississippi
 2000–2012 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	85	272	1,313	877	0	2,547
2001	105	367	1,769	1,156	0	3,397
2002	106	419	1,986	1,151	0	3,662
2003	76	401	2,073	1,085	0	3,635
2004	50	487	1,960	1,209	0	3,706
2005	43	211	1,196	786	0	2,236
2006	34	222	1,169	801	0	2,226
2007	31	228	1,128	819	0	2,206
2008	34	237	1,215	774	0	2,260
2009	32	158	909	533	0	1,632
2010	36	167	727	519	0	1,449
2011	24	175	937	536	0	1,672
2012	23	214	750	594	1	1,582
Total	679	3,558	17,132	10,840	1	32,210
Loan Amount (\$1,000s)						
2000	15,386	45,112	214,164	146,832	0	421,494
2001	17,518	62,383	288,740	190,766	0	559,407
2002	18,011	70,035	324,953	191,702	0	604,701
2003	13,160	65,993	341,291	184,314	0	604,758
2004	8,731	78,432	321,340	200,063	0	608,566
2005	7,817	35,641	193,602	132,200	0	369,260
2006	6,444	36,229	190,344	135,150	0	368,167
2007	5,668	38,632	186,045	137,100	0	367,445
2008	5,396	39,452	200,934	132,618	0	378,400
2009	5,618	26,879	147,165	90,980	0	270,642
2010	5,698	27,458	118,183	87,164	0	238,503
2011	4,167	28,258	153,878	91,368	0	277,671
2012	4,235	34,927	123,749	99,437	101	262,449
Total	117,849	589,431	2,804,388	1,819,694	101	5,331,463

Table A.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 Non-Entitlement Area of Mississippi
 2000–2012 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	57	168	721	562	0	1,508
2001	105	235	1,003	816	0	2,159
2002	83	244	1,199	814	0	2,340
2003	55	281	1,354	744	0	2,434
2004	56	331	1,183	919	0	2,489
2005	40	210	801	655	0	1,706
2006	50	169	857	656	0	1,732
2007	38	173	808	672	0	1,691
2008	38	185	837	739	0	1,799
2009	36	140	642	540	0	1,358
2010	25	118	520	478	0	1,141
2011	20	153	606	529	0	1,308
2012	29	180	568	510	1	1,288
Total	632	2,587	11,099	8,634	1	22,953
Loan Amount (\$1,000s)						
2000	23,558	83,832	348,282	266,399	0	722,071
2001	53,265	119,484	484,348	391,031	0	1,048,128
2002	43,749	124,937	564,750	385,051	0	1,118,487
2003	29,332	137,724	641,461	361,532	0	1,170,049
2004	31,154	155,554	567,231	443,491	0	1,197,430
2005	20,837	102,418	377,246	321,561	0	822,062
2006	27,586	87,271	423,774	330,567	0	869,198
2007	22,679	93,805	403,315	337,253	0	857,052
2008	19,462	93,990	414,933	370,787	0	899,172
2009	18,796	73,656	316,963	267,177	0	676,592
2010	13,244	62,833	260,815	238,345	0	575,237
2011	9,699	78,937	304,570	259,610	0	652,816
2012	16,958	90,151	295,455	254,255	500	657,319
Total	330,319	1,304,592	5,403,143	4,227,059	500	11,265,613

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

Non-Entitlement Area of Mississippi
 2000–2012 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	1,028	4,060	23,723	10,939	0	39,750
2001	1,191	4,610	25,240	12,273	0	43,314
2002	948	4,353	23,698	10,811	0	39,810
2003	407	5,035	24,375	10,401	0	40,218
2004	407	5,496	22,651	10,949	0	39,503
2005	347	3,339	16,168	9,029	0	28,883
2006	276	3,254	15,661	8,730	0	27,921
2007	291	3,234	15,806	8,672	0	28,003
2008	263	2,405	11,576	6,491	0	20,735
2009	161	1,471	7,195	4,002	0	12,829
2010	130	1,389	6,473	3,665	0	11,657
2011	164	1,648	7,783	4,664	0	14,259
2012	209	1,810	6,262	5,338	8	13,627
Total	5,822	42,104	206,611	105,964	8	360,509
Loan Amount (\$1,000s)						
2000	39,798	146,011	741,212	479,278	0	1,406,299
2001	56,884	193,186	942,793	646,258	0	1,839,121
2002	47,715	189,897	1,014,020	620,027	0	1,871,659
2003	25,130	212,123	1,077,622	606,697	0	1,921,572
2004	27,301	243,970	985,434	670,690	0	1,927,395
2005	18,587	122,776	579,983	420,929	0	1,142,275
2006	15,018	110,894	580,255	389,337	0	1,095,504
2007	16,421	98,415	490,836	363,372	0	969,044
2008	15,578	92,565	459,507	361,787	0	929,437
2009	14,860	66,587	343,045	270,705	0	695,197
2010	10,005	66,417	288,843	240,509	0	605,774
2011	7,241	71,056	335,029	249,936	0	663,262
2012	12,689	77,132	268,890	261,537	397	620,645
Total	307,227	1,691,029	8,107,469	5,581,062	397	15,687,184

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?
 State of Mississippi
 2014 Fair Housing Survey Data

Comments:
1-800-440-8091 A law firm A lawyer an attorney Attorney attorney general CallACLU to help you work through the process Department of Fair Housing & Equal Opportunity Department of Housing & Urban Development Department of Housing and Urban Development Department of HUD Dept of housing District Attorney Don't know Don't know? Dont know dont really know EEOC fair housing Fair Housing advocates Fair Housing and Equal Opportunity, and help an individual complete the FHEO complaint document. Fair Housing department within Housing and Urban Development Fair Housing Enforcement Center U.S. Department of Housing and Urban Development Richard B. Rullsl Federal Building 75 Spring Street, SW, Room 230 Atlanta, Georgia 30303-3388 (404)331-5140 1-800-440-8091 TTY (404)730-2654 Fair Housing of HUD Fair Housing, HUD Federal Fair Housing Federal Gov/HUD Fha FHEO Finances Government Gulf Coast Fair Housing HEED 3405 Medger Evers DBoulevard Jackson, MS 39283 HEED(Housing Education and Economic Development) Charles Harris Housing Authorites Housing authority HUD HUD (MS Field Office), MS Center for Justice, Gulf Coast Fair Housing Center (no longer open) HUD / Attorney General HUD and/or Local Fair Housing Agency HUD Deptatment of Fair Housing HUD Fair Housing HUD Fair Housing Hotline HUD fair housing office HUD fair housing web site, phone # or address in Washington, or HEED HUD FHA HUD Field Representative Jackson, MS Claudean Ervin HUD HOTLINE or NFHA HUD office HUD Office HUD Office of Fair Housing HUD Office of FHEO HUD or the justice department HUD regional office HUD, 1800-440-8091 HUD, Fair Housing Accessibility First Program Hud, fairhousing first HUD's Fair Housing Division

HUD's Housing Discrimination Complaint form that is available on HUD's website.
 HUDD
 I don't know
 I don't know but want to find out I feel my rights have been violated
 I don't know.
 I personally had my fair housing rights violated in luka, MS. Nobody helped me. I was shunned or never contacted back.
 I would have them contact an attorney
 I WOULD RECCOMEND PEOPLE MOVE TO ANOTHER STATE OR ANOTHER COUNTRY AS INDUSTRIAL DEVELOPMENT IN MISSISSIPPI IS FAR MORE IMPORTANT THAN THE LIVELYHOOD OR THE SIMPLE RIGHT TO LIFE IN MISSISSIPPI. AS A RUAL HOMEOWNER IN MISSISSIPPI YOU VERY OWN TAX DOLLARS CAN AND WILL BE USED TO MOVE FORGIEN MANUFACTURING INTO YOUR LIVING ROOM AND MAKE YOUR LIFE A LIVING HELL AS WELL AS UNHEALTHY LIVING CONDITIONS.
 I would refer them to the Hud Fair Housing and the Department of Health & Human Services also Attorney General's Office and the Legal Services also to MsProject Lawyers, ACLU and Department of Public Affairs
 I would tell them to find another place to live and not to worry about it. Move on with life but if they insisted on complaining I would send them to a HUD office to find out where to go.
 I wouldn't
 Internet, Lawyer
 It depends on who violated the rights. If its a City matter, they should talk with the Planning Department initially.
 Jackson, MS HUD Field Office, FHEO Dept.
 Legal services
 Legal Services
 Legal services or HUD, MS Center for Justice
 Local fair housing advocacy group & HUD Fair Housing
 Local Fair Housing office
 local housing authority
 Local lawyer
 MDA and HUD
 Mississippi AG's Office, Mississippi Center for Jusice, HEED(Housing Education and Ecnomic Development) and/or Jackson Housing Authority Homeownership Center
 Mississippi Department of housing
 Mississippi Department of Housing
 Mississippi Development Authority
 Mrs. Lemons - Jackson HUD office
 MS Center for Justice
 N/A
 Not sure
 Our Fair Housing Coordinator on staff
 our local fair housing hub
 Our local office or Jackson office
 Refer them to HUD.GOV and other local agencies
 Refer to a Housing Advocate
 South MS legal Services
 State
 State Fair Housing Office
 State of MS Appropriate Department
 State of MS HUD office
 State office of HUD
 The HUD office
 the US Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity
 To an attorney
 To Heed or HUD
 To U.S Department of Housing and Urban Development
 Toll-free hotline
 U. S. Department of HUD
 U.S Dep. of Housing and Urban Development
 U.S. Department of Housing and Urban Development
 u.s. department of housing and urban development in washington dc
 U.S. Department of Housing and Urban Development, Fair Housing Division
 U.S. Dept. of Housing and Urban Development
 US Department of HUD
 USDA
 USDA Rural Housing Service

Table B.2
How did you become aware of fair housing laws?

State of Mississippi
 2014 Fair Housing Survey Data

Comments:
A member of my household works in fair housing; I work in the housing-related industry; I am a homeowner; I research everything about fair housing.
Administration of Public Housing and Housing Choice Voucher programs, FHEO training (yearly) by HUD FHEO Staff and HUD contractors.
Affordable rural revitalization experience
As an employee for the federal government.
As part of my job
Attend and host regular Fair Housing trainings in the State.
Attended several Fair Housing Seminars and workshops
Attended several training seminars over the years.
Attending Fair Housing Seminars and Workshops; Also informed by a Fair Housing Coordinator on staff
Because of my work in the real estate industry.
Brochure
Brochures and workshop
Brochures, website
Business experience
Classes seminar
Compliance auditor and VCA Administrator for the Tennessee Valley Regional Housing Authority
Exposure to regs during the year.
Fair Housing - It's The Law Brochure
Fair Housing Training
Fair Housing Trainings
FHEO workshops and newsletters
From media such as tv, and newspapers
Had previous issues in a location that I lived in which Condo. units had a violation in design and construction and the common ground routes/sidewalks were not accessible. Equal Rights Center had to intervene
Half way home for seniors
higher education
Housing conferences, seminars, etc.
Housing laws workshop
HUD Office of FHEO Training
HUD statements.
HUD training on Fair Housing
I am a Certified Housing Counselor and our agency is certified as a HUD counseling agency where we are required to keep up to date on fair housing.
I am the Compliance Auditor and VCA Administrator for the Tennessee Valley Regional Housing Authority
I attend a few Fair Housing conferences.
I became familiar after being denied public housing numerous times in my home town because of my sexual orientation.
I have a brochure about it
I have attended many Fair Housing Workshops while working with the Jackson Housing Authority
I have attended several Fair Housing trainings and conferences.
I have been employed in the housing industry for over 20 years. Over those 20 years a major factor of my job duties has consisted of involvement with Compliance of State/Federal Laws and regulations.
I have read about them in HUD and HAC publications.
I read about fair housing laws.
I used to be a realtor and currently work in the social services area for Emergency Solutions Grant.
I was accused of being unfair based on race
I was formerly a licensed real estate sales agent.
I work for a housing authority
I've worked in housing for several years
In updating City ordinances for "family" and "group homes" definitions.
Inactive realtor
Its a requirement of my job title. I have been employed in the Housing industry for over 20 years and most of my employment was based on Housing Federal Regulation Compliance
Job
just general awareness when I first became a renter and then a homeowner
Legal training and continuing education
Lived in California for a few years.
managed federal housing programs
Management of local Housing Authority
My agency, MDA, provided a brochure about fair housing.
Not sure
Posters, media
Professional Development Training
Prohibits discrimination
Public housing training

Public Housing Training
 Purchasing a home
 Purchasing home
 reading publicly available information about the laws
 Real Estate License study
 related to my job
 Research
 Role in managing HUD Section 8 property
 self inquiry on the internet
 Self taught
 Seminars, training, publications
 Some training and workshops on the subject of fair housing laws
 state workshops or training
 Through a Resource provided to me from Atlanta, Georgia and Legal Services
 Through buying and selling a house a year ago, my realtor made me aware of some fair housing practices.
 Through extremely limited HUD seminars and publications.
 Through federal housing programs
 through grant applications
 Through HUD/MAHRO Workshops
 Through media and reading HUD regulations. Research on predatory lending.
 Through my employment
 Through my profession as an economic developer
 Through NARs Code of Ethics Bylaws and Real Estate Trainings.
 Through real estate & construction.
 through research and training
 Through volunteer efforts with non-profit that seeks to provide affordable homes.
 Thru employment (grant administrator)
 training
 Training and updated manuel given at meeting
 Training from fairhousing first/ hud
 Training provided by MDA
 Trainings
 We attend fair housing courses yearly, and keep the information updated for any changes
 When I decided to purchase a home.
 Word of mouth, pamphlets
 Work
 Work in the housing industry: have attended various trainings annually.
 work related experience
 Worked in the housing industry for over 20 years
 WORKING IN GOVERNMENT AND BE A USER OF HOUSING SERVICES
 Working in the Housing Area for Several Years
 Working with CDBG and HOME grants.
 working with CDBG projects and MDA
 Working with HUD Funded Projects
 workshops
 Workshops and training
 Workshops, regulations and compliance monitoring
 years in public office

Table B.3
How should fair housing laws be changed?

State of Mississippi
 2014 Fair Housing Survey Data

Comments:
age and income status/situation all All covered by federal law All groups any minority group Caucasian Elderly Gays Gays, transgender and Bisexual Gays, Transgenders etc... because discrimination happens towarded these men and women daily... ex. high school, college, work place... Gender High er income based individuals should be entitled to down payment ASSISTANCE. HIV individuals, same sex partners I think current laws aren't enforced consistently If a person is married and under the age of 18 they are automatically considered eligible because the marriage license makes them emancipated. If the couple should divorce, the person under the age of 18 is no longer eligible and considered a minor, therefore, losing there home. I think this should be considered case by case. A person under the age of 18 may be responsible in paying rent, getting a job and taking care of the property. INDIVIDUAL HOMEOWNERS SHOULD HAVE RIGHTS PROTECTING THEIR INVESTMENT AND LIVELYHOOD IN THE EVENT YOUR LOCAL AND STATE GOVERNMENT SHOULD DECIEDE TO CREATE AN INDUSTRIAL PARK NEXT DOOR TO YOUR LIFETIME INVESTMENT. PLEASE HELP!!!!!! Latinos LGBTG people and women Low income individuals Middle class Need to review the law People like myself who are treated with disrespect and rudeness every day by my landlord who won't fix any of these holes in my ceiling, slamming doors in my face, walking through my apartment without being invited. People should be protected against discrimination because of sexual orientation. Also heard of people being denied because of something on their credit report from 5 years ago...that doesn't make any sense to me. Just because you forgot to return a cable box 5 years a go in another state should have no effect on your ability to get fair housing in your community. people with past criminal convictions who have served their time et had no recent arrest; weight; ethnicity Poverty level sexual orientation Sexual orientation Sexual Orientation Sexual orientation, age Sexual orientation. Sexual orintation, political affiliation Sexual Preference (LGBT) Sexual preference (LGBT) communities Those who have been discriminated against for whatever reason that is not Constitutionally sound. Veterans Women of Domestic Violence and Sexual Assault who received no child support and was abandoned without a vehicle and raised their son worked hard to make ends meet and also people who were traumatized due to neglect of the mental health systems were not equipped for such and needed referral could of been helped and got to move on in their life with their career .

LOCAL FAIR HOUSING

Table B.4
Are there any specific geographic areas that have fair housing problems?

State of Mississippi
 2014 Fair Housing Survey Data

Comments:
<p>All places outside urban areas certainly some parts of the state are worse than others and each have their own challenges. The City of Madison and surrounding areas work hard to limit the number of rental apartments and therefore "transient" residents. C counties have put a ban on housing tax credit developments. The Delta region still faces some of the toughest housing issues with poor existing housing that doesn't meet any HQS with owners who continue to rent seemingly without regard to ADA requirements. I would expect some fair housing issues in the Delta.</p> <p>delta area Delta region East central Hugh lack of accessible housing, including newdevelopements not compliant with federal codes and lack enforcement. In Hattiesburg there is a neighborhood called Burketts Creek. I'm white and wasn't allowed to rent there. luka, Mississippi Denials of fair housing opportunities due to being single(not married). Denials of fair housing due to being a middle aged man without fathering any children. Denials of fair housing due to sexual orientation discrimination. Madison, Ms. No public rental units. Is that a violation? Madison, Ridgeland, Pearl, Tupelo Attempts to keep minorities out of certain neighborhoods. Most urban areas. Oxford. Because it is considered a retirement community, housing is very expensive for the low to low medium income people, and everyone does not want to live in the projects or project housing!! Pike, Amite, Wilkinson and Walthall Poverty sticken areas all over MS Rural Ms Some counties have a concentration of a single race re: the housing applications taken by our ten county offices eg: Tishomingo county and Prentiss county - predominantly white, Monroe county and Chickasaw county - predominantly black Southwest Mississippi. Due to the rural nature of this part of the state many private owner are not aware of the fair housing laws. Statewide The Delta and other communities with high poverty levels. THE MISSISSIPPI DELTA The southern counties especially the rural areas.</p>

Table B.5
Please share any additional comments.

State of Mississippi
 2014 Fair Housing Survey Data

Comments:
<p>Based on my experience, we do not have problems regarding housing in the State of MS Due to the fact that many Public Housing complexes were built in the early 1960's, most of them have not had sufficient funding to retrofit their properties for the new UFAS accessibility requirements. Also many of the developments were built in certain areas of most cities before there were laws to prohibit segregation and concentration of races. So most Public Housing Authorities find it difficult to find tenants willing to move to certain communities or parts of cities where there is a concentration of certain races. I am not a minority, but I have always lived in a neighborhood or apartment complex that was diverse. I know of only one apartment complex that caters to people without children. I always wondered if that was legal. I am not even sure if that is the case with this complex anymore. I believe that familial status applies to whether people are married or not. I believe that the LGBT community should be included in the FHA protected groups because of the law the legislature passed regarding a business owner's ability to refuse transactions with an LGBT person. I believe the more publicity and information give to the public would provide them with the knowledge to identify when the Fair Housing Policy has been violated. I can't understand why it's illegal for me to not sell or rent my property to you if I don't like you. I also don't understand why someone would want to be where they are not wanted. Just to stir up trouble I guess. I have several questions that I am trying to find answers to would like to be contacted by someone who can assist me please I hope that this survey will not be just placed into a file cabinet and forgotten, but that serious evaluation will be given to this and action taken. I was hoping to be able to acquire fair federal housing based on my income. I was denied at all three locations I applied by very religious straight married women in their 50s and 60s. I believe I was denied because I'm a gay man with no kids. I'm not sure about fair housing that's why I'm trying to reach out to someone who can stop these people from treating me and my family inhumane None Thank you for your efforts to further Fair Housing in our community. Including all segments of the community, especially Public Housing Authorities, is a step in the right direction. We all want a better and fairer community, and it takes ALL of us sitting at the table in committed collaboration together to make it happen. The appraisal & banking fields are riddled with subtle discrimination. The income limits for Housing programs are very low. This is an issue that needs to addressed immediately. We need statewide inforcement, including education of architects on compliance to federal codes</p>

FAIR HOUSING IN THE PRIVATE SECTOR

Table B.6
Are you aware of any questionable practices or barriers to fair housing choice in the rental housing market?

State of Mississippi
 2014 Fair Housing Survey Data

Comments:
<p>A landlord want to rent their property, but does not want to rent to a black person or a black person with children.</p> <p>A landlord will often not rent to a handicapped person because they might have to do improvements that would make the unit handicapped accessible.</p> <p>Although I have nothing to back this up, I have heard it all of my lifetime that certain areas of rental housing avoid mixing races. application process does not ask if you have children. on interview found you do and you face denial</p> <p>Calling to inquire as to whether an apartment is available, when you have an African American dialect, and being told there are none when you've just seen a sign that said Now Renting.</p> <p>Good credit, deposits are too high</p> <p>Higher deposits to deter possible tenants</p> <p>I think prospective tenants just move ahead and not deal with the barriers.</p> <p>I would think that the public may not be aware of the actions they can take if they feel they have been discriminated against.</p> <p>In our area, it is a very sutler approach. Terms such as "blithe" and needing to reserve the 'culture of a community' are used. However, decision that are made by our community leaders, primarily affect minority and low-income individuals. Rental housing are restricted to a certain number. The city is buying up low-income housing, which house mostly minority or low income individuals. Most of the rental property being built will be for middle class individuals.</p> <p>In the past I have been a witness in a deposition of a friend who was discriminated against, based on race.</p> <p>Lack of racial diversity in some areas Lack of access to jobs, shopping, medical</p> <p>Landlords - lack of knowledge, understanding, testing, monitoring, compliance with Fair Housing laws, policies, procedures.</p> <p>Many managers do not want to rent to people with "a lot of kids" (familial status</p> <p>Mississippi is notorious for violating the rights of its citizens. That generation is still alive and well and for all of the HUD rental properties here in my hometown...the ones who decide who gets the rent are the same ones who violated the rights of citizens back in the 60s. Deciding who gets to rent should not be based on race, religion, sexual orientation, etc.</p> <p>More personal outreach and attention is needed for people who are not familiar with rental requirements.</p> <p>Most landlords aren't direct in their refusal, but many clients get "I have nothing available after turning in their application."</p> <p>Outright discrimination Steering Exclusionary zoning ordinances</p> <p>Prefer not to answer.</p> <p>Race and income are the biggest in the Delta area.</p> <p>Race is still an issue for a lot of landlords.</p> <p>Race, disability, age</p> <p>racial discrimination still exists in Mississippi' s re market. It's hatd to overcome.</p> <p>Refusing to rent to single parents, more particular females.</p> <p>Several places/landlords around town will not rent to African Americans. Mainly in the suburb areas of Madison, Ridgeland and Pearl.</p> <p>Some landlords discriminate based upon their own religious beliefs</p> <p>The option to rent to someone or not should not be determined based on the sound of ones voice</p> <p>There are new construction, not compliant with fairhousing building codes, in and outside of local municipalities</p> <p>Those who seek to rent housing especially those with a section 8 voucher are steered toward apartments are houses that are not fit to live in and the landlords get paid fair money for rent and he/she will not repair the house as needed or repairs will be insufficient.</p> <p>Transportation</p> <p>We often counsel the "mom and pop" type landlords on discrimination issues. We often hear people say "we do not want to rent to families with too many kids". When we explain it to them, they normally correct their actions. We also offer landlord training annually.</p>

Table B.7
Are you aware of any questionable practices or barriers to fair housing choice in the real estate industry?

State of Mississippi
 2014 Fair Housing Survey Data

Comments:
<p>Again the general public may not be aware of the actions they can take.</p> <p>Attempts to keep certain neighborhoods segregated</p> <p>Certain properties are shown to certian groups</p> <p>Families might only be only shown units that have children in that area</p> <p>I still know of cases of agents not showing certain clients certain properties.</p> <p>May not show houses to qualified buyers.</p> <p>MS still has certain sections of town that are "White".</p> <p>Not accomodating, individuals in wheelchairs, to view multi-levels hones, or even inaccessible entrances</p> <p>offered housing until the owner finds out you have children</p> <p>Only showing properties to families with children and heterosexual married couples.</p> <p>ra discrimination still exists. steering to certain neighborhoods is common.</p>

Real Estate Agents steer Blacks to certain areas to buy property even when they know what location they prefer to live.
 Redlining still exists in areas like the Delta.
 Residential segregation
 safe place for children
 Some private sector rental property owners are not aware that they cannot be selective about renting to families with children.
 Steering based on age and or type of employment.
 Steering based upon race, family status
 Targeting prospective homeowners to certain neighborhoods based upon race
 Wanted to keep all black people in the same area... so their property value will not go down.

Table B.8
Are you aware of any questionable practices or barriers to fair housing choice in the mortgage and home lending industry?

State of Mississippi
 2014 Fair Housing Survey Data

Comments:

Banks set different requirements for Blacks compared to Whites when getting approval for mortgage loans.
 Certain mortgage products are offered to minorities with the higher rates
 Denying mortgage loan to black families
DUE TO REDLINING
 Failing to give mortgages (1st & 2nd) in particular areas
 I experienced a racist appraiser who undervalued property because of its location in a primarily African-American neighborhood.
 I have had situations where people of color were not presented the same financing choices as others.
 It happens!
 Lenders will not qualify a person of color for certain areas of the city if so mortgage is extreme minorities and low income borrowers pay more for loans. That's what statistics say, even with similar credit scores.
 Mortgage brokers try to get as large of a fee as they can & women & poor are seen as easier targets
 Possibly on age: i.e.: 30 mortgage to elderly
 Redlining
 The racial minority is not given variety of financing options as others.
 There are several areas that racial minorities are not able to buy homes in due to their race.
 Women and minorities have a harder time getting approved for mortgage loans.
 women should be treated as men in every aspect but at times are not

Table B.9
Are you aware of any questionable practices or barriers to fair housing choice in the housing construction or accessible housing design fields?

State of Mississippi
 2014 Fair Housing Survey Data

Comments:

All areas of access
 apartment complexes with two or more floors that do not have elevators; apartments with bathrooms that are not handicapped accessible
 Having excessive square footage limits; indirectly limits offers of familial status and elderly.
 I think the victims are not aware of their options.
 Mississippi doesn't have or doesn't follow ADA requirements in some smaller communities.
 properties must acknowledge the hardships created and be open to fix the problems at their reasonable expense
 Same as above.
 Should not be used for people with disabilities and code inspections done and corrected if offered these services
 There many, that dont meet the basic need for access (zero step entrance)
 There must be a strong mix use of housing built and the plan must consider the complexities of the community (citizens needs)
 otherwise its not a good plan - not now or for the future.

Table B.10
Are you aware of any questionable practices or barriers to fair housing choice in the home insurance industry?

State of Mississippi
 2014 Fair Housing Survey Data

Comments:

Again, residential segregation often is connected to redlining.
DUE TO REDLINING AND HOMEOWNERS UNWARE/UNINFORMED OF INSURANCE INDUSTRY
 It happens!
 Not informing the family of being in a flood zone and the family not finding out until their home is flooded and insurance will not cover it.
 quoted pricing until in person and then find rate increases
 Very serious issue again in the Delta. Ex: Small municipalities with fire department challenges (equipment, volunteers, etc.) are in jeopardy of losing their fire rating which causes insurance companies to redline the community (no longer writing policies) and this causes undue burden and stress on the citizens (high premiums) and community (no growth).

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

State of Mississippi
 2014 Fair Housing Survey Data

Comments:
<p>Again, I have nothing to back this up, but have heard this as being the case. Don't understand how two houses that are similar and are within one mile of each other but one values over double the value of the other. DUE TO RELINING AND THEIR GOAL TO DEVALUE MINORITY HOMEOWNERS AND OVER APPRAISE TO FOR SELLER TO RIP OFF POTENTIAL MINORITY HOMEOWNER I experienced this first-hand. It happens! It is a well know fact that minority and low-income individuals cant afford higher end rental or homes. It is never openly stated, because you are a minority, you cant stay in this community. A low-income person is automatically priced out of buying an upper in home or renting a luxury apartment. Jackson is the best example. All predominately white neighborhoods have the best comps/appraisals Jackson the same house there is Cheaper than the same price house in out lying areas neighborhoods around a property surely effect marketability Property valuations are typically lower for properties in predominantly minority areas. Which is not right. Same as above. We see very low appraisals in areas of high minority concentration. White appraisers have deeply undervalued a home in an all-Black neighborhood, not based on figures, but because of the location in a certain area/zip code.</p>

Table B.12
Are you aware of any questionable practices or barriers to fair housing choice in any other housing services?

State of Mississippi
 2014 Fair Housing Survey Data

Comments:
<p>Advertising - ads still placed that violate the FH Act. Help to those with impaired credit! luka Housing Authority is guilty of discrimination. Was turned down for federal assisted housing because of sexual orientation at three locations: Height Circle, Riverside Apartments, and Pickwick Circle Apartments. Obtaining public housing assistance can be a daunting challenge for individuals who already have many problems in their lives. In my experience, the HUD public housing office staff usually do not make an effort to help people understand the up-front requirements and they do not offer to help guide people through the system. Simple, clear explanations and patience are needed to help people. The applicant may have some literacy, mental health, or family issues that impede their understanding. All HUD public housing rental staff should be trained to be polite, kind and patient. These attitudes should be monitored and enforced! private landlords do not keep homes repaired for safety. They rent to who they want. They evict when they want. Some houses, trailers and apartments through the private sector and on section 8 should be considered substandard housing. The private sector should have to follow all rules and regulations as anyone else with fair and equal housing Public Housing Home of Grace and Biloxi Authorities also Mississippi Home Corporation with Affordable Housing refusing to rent to someone with a past felony conviction The housing choices are limited for people with mobility or visually impaired due to owners lack of finances to retrofit old existing properties to meet new standards. This limits the choices available to those with needs for these accommodations. Visitability, a bill now before Congress would require all homes built with federal funds, to have at least one accessible entrance and an accessible bathroom on the first floor</p>

FAIR HOUSING IN THE PUBLIC SECTOR

Table B.13
Are you aware of any questionable practices or barriers to fair housing choice in land use policies?

State of Mississippi
 2014 Fair Housing Survey Data

Comments:
<p>Certain cities refuse to have multi family dwellings. certain counties have certain restrictive covenants that prevent apartment/multi-family developments from being built or they require them to be built in one area of town with certain type of building material. City of Madison, Ms does not allow affordable housing or public housing City of McComb is and has done this practice. Historic areas I don't think there are barriers, just standard planning practice LIHTC Administration Most local governments and communities try to limit the access to land for properties for low income housing. Which creates</p>

barriers as to where people can live and work due to transportation.
 Not allowing rental of dwellings (homeowner only neighborhoods)
 Only within certain districts & only done because of incentives.
 Our county , Forrest, is looking to limit the number of mobile homes to 4 per acre, that limits the growth of mobile home parks, one place where low income families live.
 Policies that limit Multi-Family construction in city limits
 Some cities don't allow rental practices period in order to support the refusal of multi-family construction
 THE "NOT IN MY NEIGHBORHOOD" SYNDROME
 the range reaching out is not enough to serve the needs
 Their is not enough public education regarding these policies for me to answer these questions.
 there are counties that won't allow multi family housing. others won't allow affordable multi family units to be built. These restrictions tend to concentrate wealthier homes in those counties with a higher percentage of lower income rental properties in surrounding counties.
 Yes, in minority area the use of land / reuse of land is very low. Zoning issues also present challenges. And taxes incentives to developers are low. Credit issues are challenging.

Table B.14

Are you aware of any questionable practices or barriers to fair housing choice in zoning laws?

State of Mississippi
 2014 Fair Housing Survey Data

Comments:
Above, Forrest county is trying to limit the number of mobile homes you can have to 4 per acre. Again local governments tend to limit location of housing for certain members of their community. Alot city of laurel zoning specifies where group homes can be City of Madison, Ms zoning laws. No confirmed but its very public I think municipal policies may influence where group homes may be placed. Limited acreage Limits on group homes. Minimum house size regulations. Large lot requirements when utilities and other services could serve smaller lots. Ordinances restricting multi-family rentals Policies that limit Multi-Family construction in city limits This is a protection for homeowners and I do not feel like it has a negative impact on the housing market. this is a travesty and happened in our county Zoning can't restrict the placement of group homes because of several legal cases and ADA requirements.

Table B.15

Are you aware of any questionable practices or barriers to fair housing choice in occupancy standards or health and safety codes?

State of Mississippi
 2014 Fair Housing Survey Data

Comments:
Adoption and enforcement of the Standard Housing Code is a major undertaking for a small community. Usually a small town has one (or none) enforcement officer who also has many other duties. In order to enforce a housing code, the town has to be willing and able to hold landlords responsible, and often landlords are town leaders. Even if the town disregards the respect for persons in holding landlords responsible, property laws are in favor of the property owners, and any action taken by the city is often stopped by the local judge. So the town has fights on several fronts, including political considerations in dealing with landlords, dealing with tenants who are living in substandard conditions but do not want to complain because they have nowhere else to go, staffing and training for enforcement activities, etc. city of laurel not enforcing codes Code enforcement is lacking (e.g., quality of material). Health and safety violations in all communities with most of the private renting. Housing codes not enforced - very difficult to enforce (expensive). Lack of enforcement of MINIMUM building standards - buyer/renter be ware philosophy Targeting poor neighborhoods for code enforcement because a real estate agent wants to pressure owner to sell. Not inforced persons who have some family member that is legal have rights for that person to be housed and if a child then the parents as well THERE HAS BEEN A TIRE FACTORY BEING BUILT MERELY FEET FROM MY HOME. THIS WAS MADE POSSIBLE BY FUNDING FROM THE MISS DEVELOPMENT AUTHORITY. NOBODY FROM THIS BRANCH OF GOVERNMENT SEEMS TO CARE ABOUT ME OR MY FAMILY, THEIR CONCERN IS WITH THE FORGIEN ENTITY AND NOT THE WELL BEING OF OUR OWN TAXPAYING CITIZENS

Table B.16
Are you aware of any questionable practices or barriers to fair housing choice in property tax policies?

State of Mississippi
 2014 Fair Housing Survey Data

Comments:
I am not aware of any tax incentives for making reasonable accommodations or modification for the disabled. If there are such incentives, there needs to be more dissemination of this information. i do not know where they are considered at all in tax review. many things creat hardships for disabled persons Lack of awareness of existing incentives, and minimal incentive amounts Local officials sometimes will restrict low-income housing in areas. Poor people pay higher taxes than the richer people.

Table B.17
Are you aware of any questionable practices or barriers to fair housing choice in the permitting process?

State of Mississippi
 2014 Fair Housing Survey Data

Comments:
certainly a statewide problem. city of laurel offers documents only in english Including Braille No Vietnamese language documents Probably they are usually legal citizens if they seek housing and should be accomadated

Table B.18
Are you aware of any questionable practices or barriers to fair housing choice in housing construction standards?

State of Mississippi
 2014 Fair Housing Survey Data

Comments:
Guidelines change, in public housing it seems as soon as we do a rehab and conform to the standards they change them again. We are so limited on money and it is impossible to stay current with the budgets we have to work with. I'm confused of why they won't make repairs in my apartment after the fire and I have a 2 year old daughter with holes in my ceiling and mold in my bathroom and window and my balcony railings are loose Lack in knowledge of, lack in enforcement of fairhousing building codes Lack of understanding laws for accessibility requirements for new/rehab housing. Public Housing accessibility standards are different, more stringent then the general public and funds to make the changes are unavailable The code is confusing. The standards are very confusing and contradictory. UFAS and ADA standards are sometimes in opposition to each other. Urban areas

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

State of Mississippi
 2014 Fair Housing Survey Data

Comments:
Again I think municipal governments may use this type of policy to limit the fair housing process. equal for all housings is as law should be . often known it is not. Generally restrictions are incentive-based. NEIGHBORHOOD????? WHO CARES??? LET'S DEVELOP INDUSTRY!!!! TO HELL WITH THE NEIGHBORHOOD..... NIMBYism is alive and well in most communities. No one seems to want affordable housing developments near their community. Permits not granted by city inspector because land would probably be bought by minorities The only policy that I am familiar with is one that was recently passed by one of the housing association in our community. Due to the recent tornads, one community was almost totally destroyed. The residents, along with our mayor, are proposing an overly, which is suppose to preserve the culture of their community. This is predominately a all white middle class community. I don't really know what is meant by the culture of this community, unless it refers to no Section 8, or low-income individuals can live in that community.

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

State of Mississippi
 2014 Fair Housing Survey Data

Comments:
<p>Both transportation and employment are HUGE impediments in rural Southwest MS. Most transportation services are limited to Medicare and Medicaid clients, and not the general public. Our low income clients have to pay family/friends a very high fee just to come to appointments, doctors' visits, school appointments. etc.</p> <p>Due to the fact that most of Mississippi is rural and lacks mass transit systems, low income families find it difficult to locate employment and get access to government services.</p> <p>funding</p> <p>I don't know if this is fair housing related, but the services aren't offered in most areas. Lack of funding maybe.</p> <p>In many area's, including minority owned, minority status should include all protected classes, not just race and sex, or nationality</p> <p>Lack of public transportation in rural or suburban areas.</p> <p>Lack of transportation</p> <p>Lack of transportation and employment services in the county create a huge burden on low-income families. To register at the nearest WIN Job Center, residents must travel to Picayune. There is no public transportation in the county for anyone other than elderly disabled to travel to and from the Senior Center.</p> <p>Mississippi has inadequate public transportation even in larger cities.</p> <p>More public transportation needed</p> <p>Most rural areas do not have public transportation, which prohibits a large segment of a population barriers to receiving service.</p> <p>no public transportation for more rural areas of the state</p> <p>NOW THAT THE TIRE PLANT IS BEING BUILT, ROADS AND OTHER LAND HAVE BEEN GIVEN TO THE YOKOHOMA PLANT MAKING IT IMPOSSIBLE FOR US TO EVEN GET TO THE HOSPITAL OR LAW ENFORCEMENT SHOUD THE TRAINS BE BLOCKING THE ROADS. WE CAN NOT EVEN SLEEP IN THE CONFINES OF OUR OWN HOMES DUE TO THIS PROJECT. PLEASE WE NEED YOUR HELP!!!</p> <p>Our community do not have a public transportation system. We are trying to get this as apart of our community. However, the reason stated for not having it, is that there are no funds. Yet, we have just built a nice aquatic center, etc.</p> <p>Public accessible routes from streets to various common areas.</p> <p>Public trans.</p> <p>Public transit is somewhat limited in this City and it actually hindered us utilizing grant funds (FHLB) because the only houses we could assist needed to be within a half mile of public transit.</p> <p>Public transit is very very limited in North MS. The Jackson area and the southern part of the state receives much more attention in this area.</p> <p>Rural areas have limited access to transportation.</p> <p>Services are fractured, making it very difficult for low-income/disabled to navigate services.</p> <p>Subsidized housing being placed in areas without services because land is cheaper</p> <p>There are no nearby employment offices near South and West Jackson. Transportation services are inadequate (not enough time options)</p> <p>There are no transportation in McComb that will be affordable like this.</p> <p>transportation</p> <p>TRANSPORTATION (BUSES-TAXIS) MAJOR ISSUE IN DELTA</p> <p>Transportation is a major barrier--for example, someone living in horrible conditions in a rural area find transportation to town to inquire about public housing or other rental properties. Usually this means they have to pay someone to take them. They arrive at the housing rental office and are told they don't have everything they need and cannot apply until they have that piece of paper. So that means another trip. PERSONNEL AT HOUSING RENTAL OFFICES SHOULD BE WELL TRAINED IN CUSTOMER SERVICE--there are some people who should not be in those jobs!</p> <p>When the government services are not located nearby then those without personal transportation have limited if no access.</p> <p>Yes, Transportation and employment services.</p>

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

State of Mississippi
 2014 Fair Housing Survey Data

Comments:
<p>deposits expenses for aquairing utilitys services Lack of customer service training. Lack of knowledge/cooperation from city/county officials hinders development projects of public housing authorities. More funding and involvement and inclusiveness of public housing authorities at the state level is much needed. Public housing authorities should be included and have input for each service rendered by the state, especially Health, Human Services, Transportation, Dept of Justice, Economic Development, CDBG grants and other economic grants, Recreation, Safety/Security, Disaster Preparedness, etc. Our low income clients should have knowledge and access to all services via the Public Housing Authority. money Property tax. The administrative actions of not being able to receive copies of documents to explain their actions. These people are unprofessional and rude. The lack of incentives that will allow Public Housing Authorities to be equal players in applying for development funds. Housing Authorities cater to the most needy segments of most communities, but are often not contacted when local governments plan to apply for CDBG funding. They miss an opportunity to satisfy Section 3 requirements by not contacting Housing Authorities on the front end of the application process. The three major area's are awareness of building codes for owners, builders, and architect's. Enforcement of exsusting codes, and awareness of and effectiveness (size of) tax incentives There seems to be a culture of poor customer service in HUD Public Housing offices (I have observed this in more than one city and State). The requirements for application can be overwhelming to someone who is already overwhelmed by financial or family problems. These are the people who most desperately need housing assistance. UPCS guidelines in Public Housing, there should be universal guidelines</p>

C. MINUTES FROM 2014 FAIR HOUSING FORUMS

Hattiesburg

Comment 1: There was no, first and for most Mississippi doesn't have a state fair housing enforcement agency unlike many other states in the country. So we don't have a state agency that is in charge with receiving those types of complaints. The only avenue for redress is to file a complaint with HUD. In order to facilitate that we don't have any private agency that's from the time the act was adopted in 1968 until around 2002/2003 and then this was a little bit curious in the fact that HUD had previously funded a fair housing group, HUD chose to fund two. One you referred to which was the Gulf Coast Fair Housing Center which served the six lower most counties and another one sponsored by South Mississippi Legal Services that was called the Mississippi Fair Housing Center and had a statewide reach. So from the period beginning on your chart 2004 until about 2012 you had two robust fully funded fair housing enforcement agencies sponsored by HUD in the State of Mississippi. They both went away somewhere around 2012/2013.

Rob Gaudin: Why did they go away?

Comment 2: I don't know.

Rob Gaudin: Maybe just how long they were funded.

Comment 3: I can't state that for a fact. We can presume that resources would have had to be an issue.

Rob Gaudin: They both organizations were FIPs. That is funded by the Fair Housing Initiative Program. There are no more FIPs in this city.

Comment 4: Until January of 2014 when my organization the Mississippi Center for Justice received a FIPs grant and opened its doors to begin processing HUD complaints.

Comment 5: At USM we have a fair housing program The Institute for Disability Studies. What I am finding is people have complained, but because sometimes they live in smaller towns they have a fear of retaliation and people know people. I just referred a lady to our fair housing person and one of the things that the lady told me, she said well my fear is because the police were called and other things. She was renting an apartment and she gave them notice that she was purchasing a home. When she told them that she was purchasing a home, she did it like 60 days in advance, because she didn't want to miss the deadline and so she was trying to prepare a head of time. They came into the apartment while she was in there and altercations happened. They did not knock or anything. They just came in and some other things happened and the police were called. She ended up with bruises and different things, because she didn't know who they were and she said they didn't and the police and everybody were related even to the judge. She said what do I do? I said that I am so sorry that that happened to you and I called the fair housing person and referred her to her. The lady called me back and said that I am scared because I am in my house now, but is that supposed to happen? I said no ma'am, but that is a fear. When you live in small communities and then you and the relationship with the judge and the law enforcement and everything.

Rob Gaudin: I am also hearing you say that this retaliation is way too small. This should be reflected into a larger pool of actual events, but people are reluctant to report this.

Comment 6: Right and then because they are low, very low-income they, a lot of time they don't feel that. They know they have a voice, but because they don't have the finances and other means that some of them don't have the education and they depend on other people. Then when you, when they depend on other people to help them and to guide them, they feel intimidated. They are a lot of times they are talked down to. Reality that is what happens.

Comment 7: I think that goes to education and outreach. So again what I take away from this chart is that when you have fully funded staff and active organizations who are engaged not only in education and outreach about the Fair Housing Act, but who are also filing or assisting in the filing of complaints for people. Your numbers of enforcement actions go up. When this has happened in Mississippi you do not have other private or state agencies enforcing the Fair Housing Act the numbers go down in part because, there is less education and outreach and secondly there is less actual enforcement. You know and I know and everyone at the table knows you can go to HUD and file a complaint online, but the kind of people, as discrimination moves into the closet in Mississippi, as opened to be outright fear and hateful and open. The people that experience that discrimination are going to be less likely to have access to the educational tools that they need to self-enforce the Fair Housing Act, if you will. It is education and outreach and the presence of staff persons and attorneys that can actually file complaints on behalf of affected citizens. That is what I take way from the chart.

Comment 8: I agree with you because a lot of these families they do not have computer to file online. Then when we do the fair housing workshops there is a misconception of about what it is sometimes because it is lack of knowledge once again. Then I know I have gone with some of my colleges to workshops and what made them come out was we tied it into. They were familiar with my name. A lot of them in this particular area in North Mississippi and they said ok when she comes she brings us information, but it was really for the Fair Housing College to come in. they learned a lot, but initially they tie it to when this lady comes has information for us. If you say fair housing, I think it is a fear because I've looked at some of their numbers with some of these workshops and they are not large at all and then because my name was attached to it and the lady that I usually work with in this particular area. She said that I was coming and she put it out there to the particular churches, but they assumed that I was coming to do what I normally do, but I am glad that they did, because some of the people they needed to hear the information and they did get information that they were not aware of, because a lot of them are renters.

Rob Gaudin: The grant that you guys recently received the FIPs grant. There is some lag between the times that it gets entered into the TEAPOTS system. Could you explain, one complaint is not accurate since you got your grant, but could you talk about that traffic through your office on this issue, since you got your grant?

Comment 9: Sure. No, there isn't enough of a time frame to let the complaints that will actually be generated by the grant that funds our organization, because we opened our doors in January and you need a certain amount of education and outreach getting started before that takes place. The HUD grant actually has time tables that we are on target for and benchmarks in terms of number of complaints that we are on target to achieve those, but what we have done in addition to education and outreach events are receive and investigate allegations of fair

housing. We have received allegations of fair housing violations based upon race, gender, and disability in the rental market. That is where we have received allegations.

Rob Gaudin: The top three here. There is a correlation.

Comment 10: We also and from what I think that most people that you talk to in the field that is what you probably hear. We are also planning to do some systemic testing. We are not well funded to do a lot of systemic testing. In fact we have expended half of the budget that we have been allocated for testing. Systemic testing according to the information that I have reveals racial discrimination in the rental market, familial status discrimination in the advertising market, and numerous disability access violations.

Rob Gaudin: For those of you who are not familiar there are different types of testing, complaint based means that you go and test upon a complaint and a systemic, please explain how you have implemented you systemic?

Comment 11: So you might, well people who apply for a FIP grant that targets certain areas based upon and understanding that that is something that needs to be done in the state. We targeted some rental, some sales, some lending, and some advertising. A very small amount of advertising and not a great deal of lending testing because we found most of the problems in Mississippi occur in rental market and so with a systemic I don't have to have Ms. Jones call in and say I think I was denied an apartment because I am a single mother and I have a child. You could send testers out posing as single mothers with children, followed by people who were married couples and if they were treated differently in the time frame was closely enough connected. If you followed all of your testing protocols you would have what is called an affirmative test of familial status discrimination. In the advertising market I know one of the things we found was a newspaper that agreed to run an ad saying no children. Straight up violation.

(Presentation)

Comment 12: So let me ask a question. Have you broken out the denial rates by race?

Rob Gaudin: Here are the denial rates by race.

(Presentation)

Rob Gaudin: What was the success of your tests?

Comment 13: So the success on lending the time line is not yet available.

Rob Gaudin: Oh, they are not yet available.

Comment 14: They don't roll out till August.

Rob Gaudin: August of this year. I would really be interested in seeing that.

(Presentation)

Comment 15: The obligation is not entirely on the non-profit community to build that structure and many states have a state agency that is dedicated not only to education and outreach, but to enforcement. So that is an important distinction between Mississippi and other states in the country. As we see these widespread disparities among racial lines, which your work clearly

shows and we all know the trouble to put it politely the history of Mississippi turns opposition into integration in the civil right progress. We can well conclude there is more the state can do to enforce the Fair Housing Act. We could make that conclusion. We are not just saying you go get a HUD grant. I hope you can get more and increase our infrastructure.

Rob Gaudin: You are absolutely correct. If the state were to take on this issue and even if they did not expand the classes particularly, but just affirm those in the state's law with its own State Fair Housing Act or Civil Rights Act for employment or other pieces too. That its own state act then for fair housing they had muscle to enforce that. Then they could go to HUD and ask to be a fair housing assistance program participating FIPs and FHAPs, but they get paid on a per case basis. It is net revenue inflow. You just get it and they work. Some states have been able to accomplish that and some states have passed their act. Some states haven't been able to get a substantiate equivalent status as to test as HUD does. New Mexico has the act, they have the bureau, and they can't get status because they didn't really fund the bureau to do it. So actually you have to do all these steps and put all of these things in place.

Comment 16: It takes a commitment.

Rob Gaudin: it takes a commitment. It takes time to formulate it and implement it. Other states, I have another example is the State of Montana. The group that had the rights to do this took on the real estate industry. Opps, they were no longer a commission. They were a bureau buried at the bottom of labor. Next time the legislation came around they said that you have to be reasonable. So it takes it from all. You can get it together and you can get it taken away. It's politics. So it takes the care to make it stay. Other states have successfully created those and enjoy the revenue stream and even have local offices scattered throughout the state for walk in traffic and all of that. It is a revenue generator. Not at first, but over the long haul it is a revenue generator. You get it on a case by case basis and you get a HUD revenue and if you are doing a great job, then your per case payment goes up. It can be a very positive thing, but it takes effort.

(Presentation)

Comment 17: Since you are focusing on the non-entitlement jurisdictions, what is your plan for the entitlement jurisdictions? Do you just receive the work that they do under this analysis and merge that with what you are discovering in non-entitlement or is there some other strategy?

Rob Gaudin: We are going to invite the entitlements to participate in this process, but it is not like we are going to take over their process.

Comment 18: So I guess a follow-up up question is how you deal with the possibility that a jurisdiction does a weak analysis or doesn't do a thorough analysis.

Rob Gaudin: Maybe Ray can respond to that. My initial reaction is HUD does the review and we don't.

Comment 19: Well to get back on the first question. I thought before we contracted out with Mr. Gaudin, I posed that question to the HUD office. We have entitlements that must do an AI, does the state include them or do we exclude them? This is a statewide study and I am still waiting on a response. Their response was that was a good question and let me look into that. We can't stop our process, but if they get back with us then maybe we can pool that group together and get that information. Right now it is still. The other dynamic is that even though

we do not fund Hattiesburg directly that county on the outskirts of Hattiesburg we fund. So there is still communicating with that jurisdiction. We're still getting information and so...

Comment 20: (Inaudible)

Comment 21: We just took the fair road approach as to not overlap in what they may deem an impediment for the area. I think what they find may happen statewide. So at some point I think we will have to look. I don't know what scale as far as having to do one. I don't know what your final plan is.

Rob Gaudin: I can offer some historic perspective about what states have done and 20 years ago the states would do statewide. Starting 8 or 10 years ago some started to not include the entitlements because then you are on the hook for sticking your nose on the entitlement community on their laws, etc. Now almost no state includes their entitlements in their AI. We have done them in Tennessee, Nebraska, and Wyoming, and Oregon, and New Mexico and everybody now is doing them without the entitlements. Then we are not obligated to anything within the city of Jackson with no resources that can go to the City of Jackson. That is a program barrier. On the other hand there are ways to incorporate and coordinate because private sectors do not know community boundaries, public sectors do. Zoning and planning is not outside of Jackson, it is inside for examples. So the private sector we all have the same lending problems. That is where we can share our activities and the public sector issues are a little bit more you have to focus on your own area.

Comment 22: Typically we talk about the fair housing and at one point each city will. Fair housing laws, there was a fair housing conference last month up in Jackson. Two of our legislators that were on the housing committee were there giving a presentation. The HUD representative was there and asking specific question, do you see Mississippi enacting a fair housing law in my lifetime? This is the fair housing person. The legislator, he said what? He has no hope that it will happen.

Comment 23: The thing is the absence of a fair housing law is still identifiable to affirmatively furthering fair housing and we can't control the legislator, but there is a process here that we are going through and we can't do the Mississippi thing of saying oh that is not likely to happen. This process should result in specific identification of every single impediment to fair housing and then it should have absolute objectives for correcting that impediment. Measurable ways of looking at progress towards that and the rest is just fallout from HUD or fallout from Mississippi or the legislator that you can't control or whatever. I know I am here in good faith to make sure that this process does what it is supposed to do and that we clearly identify the impediments some obvious and some not so obvious. One obvious impediment is the absence of a state fair housing.

Comment 24: I think personally as a state worker with MDA, like you said , I can't worry about the legislative now with being in charge of affirmatively further fair housing across the state. We are going to do that. In Tupelo yesterday, two things we had, have a car and we will travel and we have lots of paper. You all can assist us. When we put these maps together data says a lot. When you see those numbers you start wiggling a bit in your seat. It is not a good feeling. Those areas those numbers are high, that is where we need to hit with education, outreach and that is one thing we are really charged to do. We are going to do that. We are going to do what we have to do. We may go down in a flame of fire, but we are going to have some

accomplishment that we can show. This document was not in vain. We are making strides every day.

Comment 25: First of all in some of those data we looked at when looked at high percentage of race and denials of loans and high interest rates are most primarily black. Obviously the institutions are saying that based on their background issues and credit this is why. What do you do in your case what do you do? What do you think is an answer to dealing with some of that? How do you make an institution loan an individual's when you have seen the history, employment history and things of that nature? What I feel is the biggest problem we have dealing with issues like more education and some intervention to correct some of these issues that are prevalent among the population we are talking about. You got to get people to the point where you have to deal with those background issues. You have to deal with the fact that you have not been consistent in paying back your loans or taking care of your financial obligations.

Comment 26: Personal responsibility.

Comment 27: What are you saying?

Rob Gaudin: What I have done and the kind of suggestions I have made in the past. Let me rephrase that, is I have suggested that people enhance homebuyer education and after they get the loan. Some kind of homebuyer guidance on how to keep up their credit. Don't go buy a new car now that you have a new house and don't go buy a boat. You are just going to end up in trouble. So there are certain financial skills. People call it financial literacy.

Comment 28: Just continue to pay your bills on time.

Rob Gaudin: So some state agencies have sponsored financial literacy classes in high school. It is not like all year. They have a speaker come in for a two hour session to the seniors about something they could consider and about the implication about using all those credit cards you get in the mail and that kind of thing. There is the financial literacy part about getting into a house and keeping your credit, establishing credit, and maintaining it. Those pieces, the personal responsibility that you are talking about are one thing. The other thing is that when you are ready you have those ducks in a row and then you need to recognize what the look and feel of a predatory instrument is. That is the outreach and education and teaching people how to discriminate between those two. Just like the lady here, the story I told the first time. She knew it, but she couldn't get it. Maybe times have changes and hopefully they do. This person was in her 50's then. We need to have people understand and sense what the differences are between the loans that they are presented with. So it is outreach and education of financial literacy. You could try to go after the industry. One way is testing, but it is expensive. The best way in the long term is probably increase people's understanding on how to use credit.

Comment 29: I teach homebuyer education and I find over the years that you have to use different techniques because people are from different walks of life. I find what is most useful is when I do role play. I can pick just anybody and ask them to work with me. I will play like I am at a car dealership sometimes and I play like I am at a finance company. Over half that class is like that is what they did to me. A lot of times it is because they don't know it is because they grew up a certain way and that is all that they know. Momma did it. Daddy did it. It is OK because they have built that relationship with that finance company and they feel, but

their credit score could be 700, but because Momma and daddy said so. They use that same one. I use different education techniques and role play helps. You set up and you talk, but everybody does not receive the same. So I am like this person may not be on that level where all these words are bypassing them. If you get them to interact, you find that a lot with them.

Comment 30: Role play. I do the same classes and that is a good tool. I will take that back.

Comment 31: This is a beginning stage. This is where we talk. This is where we communicate. This is where we gather the information and the list will come out with those impediments and we are going to need this group and everyone else to assist us in how do we address this and eliminate it, basically.

Comment 32: I would like to offer some comment to that point. I am going to put in some type of written letter to the MDA. I feel like that structure of this gathering has been kind of informal and something might get left out if I am going to speak off the top of my head or follow the flow of the meeting. In terms of impediments I have already mentioned the absence of the state fair housing laws and the absence of a state fair housing enforcement agency. I would also add to that the fact that we don't have an Affordable Housing Trust Fund in Mississippi, but other states have adopted it. I appreciate the political realities that you run into at the legislator because we have been up there four years in a row to try to have this adopted. It would be helpful if it was identified as an impediment. That is at least something that you could go back and say this could help you with your fair housing problem. Want to talk about a special population that could benefit from the trust fund and that is the mentally ill and people that are develop mentally disabled. So there is a special problem in Mississippi right now. Those of you that are in the state already know about it. That is that the Department of Justice in 2011 issued findings of fact saying that Mississippi was not up to speed with terms of Olmstead. That is the Supreme Court Decision that requires mentally ill and developmentally disabled populations be treated in the least restrictive environment. The Department of Justice found that Mississippi wasn't the most if not the most institutional reliant state in the nation. Are you familiar with the problem? So we are going to and I just talked to one of the women who is handling the lawsuit on behalf of the Justice Department and Mississippi is about at the end of its leash with the Justice in terms with having to work out some sort of solution and Justice has brought these in other states and they have settled them in other states. There are plenty of reasonable ways to settle them. One of those frequently used ways to resolve them is to issue vouchers to these populations which they can take into less restrictive communities and use. That means two things that there has to be housing out there for those people to purchase with their vouchers and it also means that they are going to need protection from fair housing violations, because we know that this is a population that encounter discrimination all the time. So just highlighting for you that there is a special need right now at this time in Mississippi, because of the fact that we are under speed in terms of compliance with Olmstead and there is an opportunity here both with fair housing and with the Affordable Housing Trust Fund to provide protection to that population. The population is going to need another important impediment to affirmatively furthering fair housing in Mississippi is exclusionary zoning and land use. We have encountered this. We have certainly encounter this on the coast in the aftermath of Katrina with jurisdictions that wanted to restrict replacement of Katrina cottages in their area, but also jurisdictions that want to pass ordinances restricting the development of mobile family. That is where it still comes up and it comes up across the state. So exclusionary zoning is an impediment. Another impediment is the effect of programs that are actually administered by the state and I would challenge the people who are conducting this study to analyze the effect

of the state's administration on HOME, CDBG, and low-income housing tax credit dollars and take a look at where you got the statically ability. Take a look at where affordable housing is located and where the dollars are going and where they are not going and how that effects on racial segregation. Then I think that in terms of outcomes that will help, I would like to see a document of strong corrective actions and timelines and names of responsible parties. So if we get out of this process an Analysis of Impediments it comes back and it primarily recommendation is that there needs to be more education and outreach in the state of Mississippi. That is not going to be very satisfactory. That is a way that has historically been used to shift the burden to community based organizations and non-profits to do the work. What we really need to be doing is following the money, the CDBG dollars. That is the duty. If you are receiving this money, you have to certify that you are affirmatively furthering fair housing in the way that you use that money. So follow the money and look at the pattern of distribution, where it is going, where it is not going, and what that is doing to the map in terms of racial segregation. When we look for racial segregation we need to use advanced statically measures of segregation such as dissimilarity and isolations and not just the plus or minus 10 percent disparity. That is not the most current way of examining segregation and using the most up to date data, the ACS. I want to say one other thing about the process, but I don't want to be ghastly criticized. I really appreciate the invitation to come here. I realize that my background in education, privilege made me more able to hear about this and more able to get into a functioning vehicle to come up here to listen. Most of the people at this table are not from community based organizations. I know a lot. These are great people, but if somebody were to come in and say where are the grassroots community based organizations? At least with Hattiesburg we might hear some pushback about who is in this room and who is not in this room. So I think it is probably going to take more than just four meetings and more than just some education and outreach to be done to make sure that people found out that they were included in this conversation. As feedback that you are not trying to look over the shoulders of the entitlement cities, you have chosen to have three of the four meeting in the entitlement cities. I think that it might be prudent to think about, getting to Columbus or others and figure out some way to get some feedback from the non-entitlement jurisdictions, from the grassroots folks on the ground, and I don't dominate conversations, so there will be some additional things I writing. It has been a great opportunity and come and talk directly to that people that are going to be shaping the outcome of this document and to be able to provide my contribution. I really appreciate it.

Comment 33: This is what we need and I can't speak for what happened years back. I can only speak for now. This is a preliminary meeting and Rob yesterday. A lot of times information is submitted after the fact and that are what we don't want. We have email notifications. We have mailings. We need to speak to the people to get information. There may be another series of four or five meetings before this is even going to get to a final stage. It is something that we are going to have to look at and get that message out. That is why we need everyone. It is like the chain emails.

Comment 34: With the chain email is that people get too much viral and so too much email that I find that it is better if you pick up the phone so someone can hear your voice. Like he said get into the other areas that are not entitlement cities like West Point. I tell you the City of West Point, that lady that is in that office; she knows how to get the people to come out.

Comment 35: That is something that we haven't heard. That is a good one.

Comment 36: I think he would have said “Who would have thought it?”

Comment 37: I guess traditionally it is more of a geographic kind of thing. That is the way that it is set up.

Comment 38: If we keep doing the same thing we have been doing we will get the same results. So change up if that means just gradually with The Institute for Disability Studies. Yes we have and we work outside of the city limits. So the entitlement areas and so I am in charge to work those areas. I do know that there is a dire need for the education. With the non-profits we also have, we are strapped because we don’t have the funds to reach the masses even though there is a need. I have had people lately to email me to ask if I can come there, but I can’t go there because.

Comment 39: We communities with CHD instructions. I don’t know if most you all have seen those.

Comment 40: That is not how I heard about this. I got the advertisement in the paper, I got an email.

Comment 41: That is one thing as far as compliance is looking at how to build substantial outreach. (Inaudible) That is our targeted way, mayors, communities; citizens of communities receive funding from us. As we complete this document (Inaudible).

(Inaudible)

Comment 42: We wrote our HUD grant. I should also add that we were not fully funded. Congress didn’t have enough FIP money. They asked me to look to your state’s plan to see what your need is. That is how you support your state. We went back and looked at the state plan and the state specifically identified racial discrimination in the sales market inclosing racial serotypes. That is one of the things that we were able to draw out, but that document didn’t have in it was a real approach to curbing that practice other than education and outreach. So along the lines of talking about further years from now we come back and keep seeing racial discrimination identified as an impediment and no measurable benchmarks of a solution.

Itta Bena

Comment 1: Excuse me, do you have this that we can use or by email? Where can I find this information that you are presenting now?

Rob Gaudin: It will be made available to you if you signed in with your email address.

Comment 2: After we complete our forums we will have it on our website and I will also email you.

Comment 3: Thank you.

(Presentation)

Comment 4: I had a call from one of my clients one time and it took me a while. I had to go and research several different places before I figured out what I needed to do as far as the complaint and then get back to the client. That is more likely what it is. People do not know where to go and who to contact.

Rob Gaudin: Where did you eventually refer them?

Comment 5: They ended up talking to the state office of HUD in Jackson, but I was routed to Atlanta. I just went around the circle before I got to where I needed to be.

Rob Gaudin: Think of it. If you are John Q. Public just how frustrating it is to call this number and call that number. It is a difficult system to access what little bit we have.

Comment 6: Some of them the people may not realize because they are not familiar with the fair housing law, what is defined as discrimination. They may not realize what it is and so therefore we don't have any complaints because they don't realize what is going on.

Rob Gaudin: I agree with you. So it is really hard to believe we have such little activity. I think as you suggested we are missing a big piece about access to the fair housing system.

(Presentation)

Comment 7: I can just say for myself that I was denied a higher loan and my husband and I have been at our jobs for two years and we are stable people. We were turned down and we ended up having to go out of state to get a loan to get a home. So I can say that that is accurate from my personal experience. We are stable people in the community. We weren't going anywhere and in fact my husband was a lifelong resident. I moved here because of a job and still we could not get funding.

Rob Gaudin: Did they provide you with a reason.

Comment 8: That is another issue, because they may have the income and they may have some other factors going for them, but when you pull their credit. Their credit is the number one issue, credit was not an issue for us, but we ended up going out of state to get it. That is typical for this area.

Rob Gaudin: Do you have a story as well?

Comment 9: We have a home in the Section 8 program. I don't think, we had one person qualify and she worked for credit agency. She had to pay somebody to help here build her credit score. That is the only way that somebody can get qualified. You have been on the job for so many years, and you have the income, not even families with disabled, that person paid somebody and that put her at a disadvantage, because that is money she didn't have to pay that person, but she wanted a home. With the Section 8 program, it assists you with the mortgage and the bank wouldn't take that into consideration or anything. All they would say it is HUD credit. She was working with a lady with the same job and she made the same income and that is her friend so they compared and she got a home, but I couldn't.

Comment 10: Same race?

Comment 11: No, different race.

(Presentation)

Comment 12: As we go through this process, this is where everybody can come together and say predatory loans are an issue. We know MDA can't do it by ourselves, but it can be done? There is a big issue with that local unit of government and maybe we can partner. These groups come together with the education and outreach and then provide the information to those citizens and it spreads from there. So keep that in mind too. That is what it is all about.

(Presentation)

Comment 13: So when you finish gathering your information what do you plan to do with the information.

Comment 14: What happens is once we compile and complete all of the preliminary readings and put all of that together then we come back out again. Here are our findings. This is what the impediments are. These are the recommended actions. These are the recommended partnering agencies that will assist us in eliminating these impediments. Once we put that together we put it out for public comment again. So that someone can agree or disagree or add to the impediments or add a recommendation to what we can do to that. Once that comment period is over we will compile it, finalize it, and it will go into effect for our next five year plan. It really starts before that. The same impediments we have identified we will be working on regardless, but it will direct that next Five-Year Consolidated Plan. One big dynamic, I love Rob's maps. Maps and data say a lot. There is no way. Here is and that area where the disparity is that is going to guide our plans. Even though we have a competitive process when it comes to our grants that is going to be a factor. Outreach efforts, where the lighter shade areas where we can still do outreach and education over there and up in the Delta area and this area a little bit more, a lot more. How best we can do that. It will take more than one meeting at the Civic Center.

Comment 15: The information that you provided, is that just for this area or Mississippi as a whole?

Rob Gaudin: Thus far we have taken the non-entitlement areas from the state. We are excluding those cities that get funds directly from HUD, such as Hattiesburg, Jackson, Biloxi, and so on. I do want to emphasize today's opportunity as well as the opportunity to offer perspective and commentary. Perhaps there are things that you think will never happen, but I really want to say. Remember we are going to try to think outside the box and consider everything. We already had the conversation internally and we will continue. OK, we don't have a Fair Housing Act, so we will dig out the language that this has been tried six times in the past and it has failed every time, but someday it will succeed. So bring it out and dust it off and put it back in the study and say this is what we need to do here. It seems to get shot down every time it is up to pass, but it isn't truly dead yet because something needs to be done. When you offer us commentary, your perspective, I urge you not to get discouraged about what has happened in the past, but look for what might be for the future.

Comment 16: We may work for a particular organization. Sometime we will focus on what that organization needs or what that organization wants, but look at as you are a citizen of this state. I am a citizen and this is what needs to happen. So take the organization out of it, but every impediment that is identified will be captured and reviewed and will come together. There will be a ranking system. I don't know how we are going to do it. That is why we have

Mr. Gaudin. So far so good and we would love to have our survey numbers come up tremendously. That secures our inclusiveness. We want people to come.

Jackson

Comment 1: How did the American Indian make such a significant jump? Were they just not registered? 31 percent change.

Rob Gaudin: They grew from roughly 11,000 to 14,000. This is self-selection. What are you? So people can select that.

Comment 2: Males is a significant jump in the Asian population. So were they just not registered?

Rob Gaudin: In the Census it is not about being registered. You get a form to fill out and then you fill it out and you self-select. The real differences between the two Censuses are the other. It is not two or more, it is other. Somebody has identified as others. So sometimes people no longer identify with white or black or Asian, but other. I am Polynesian, I'm something else. So it is self-selected. Those people chose themselves.

(Presentation)

Comment 3: Do we know what county or what area it is close to?

Rob Gaudin: These are Census tracts.

Comment 4: Is that the lower delta region? Is that homes?

Comment 5: Right here? I know that is the Delta, Sharkey County. This is a homes count.

Rob Gaudin: I apologize, sometimes I start to put too many things on these maps and you can't make out anything. So I just left on the highways. Remember all this data is without the cities. That is why it is just white.

(Presentation)

Comment 6: Is that a result of complaints filed or complaints that actually resulted in a finding?

Rob Gaudin: These are complaints filed and we will see the other slide in a moment.

(Presentation)

Comment 7: Is it also lower than other comparable states? Let's just say like Alabama or Southern?

Rob Gaudin: Yes it is. Well now wait, not so much the South is a little different than say the South or the Southwest or the Midwest. Minnesota we have done.

Comment 8: It appears that the poverty and the complaints have a direct correlation?

Rob Gaudin: We can't draw statically a correlation, but it does seem that in areas of higher incidents of poverty people has less understanding or access to the system. They have less understanding of where to turn to or what to do or they just think that is the way that it is and go down the road.

Comment 9: I was thinking the opposite. It is somewhat of the same language. You don't have the financial resources to move to a particular place. So you are less likely to file a complaint because the cost to stay there is \$800 and you only have \$600, but in another area you may have the \$800 to live there, but you complain and they don't want you to stay there verses I don't have the funds. So I don't put an application in that area. Say you want to buy a house in Madison and you don't have the resources, then you just don't go look in Madison for a house. It is plain and simple.

Rob Gaudin: We will look at the purchasing issues as well.

Comment 10: I am saying the rental as well. There are certain communities in Mississippi that higher income communities, people just don't make applications in those areas.

Comment 11: In a lot of the higher income communities they don't have rentals available such as like Madison. They made a conscious effort to make sure that they didn't have rental units available in those areas. That is something that needs to be addressed as well.

Comment 12: Talk about exclusionary zoning.

Comment 13: Or at least having the effect of being exclusionary.

Rob Gaudin: Your point is exactly right on.

(Presentation)

Comment 14: Has part of that contributed to the foreclosure crisis, the new requirements in obtaining a loan possibility?

Rob Gaudin: There are new requirements in obtaining a loan, but you can't get there if you can't qualify. You don't really apply, because somebody will talk to you when you sit there. Why go through this? Why pay the money? Haven't seen that have this significant an impact.

(Presentation)

Comment 15: Do people do testing and lending?

Rob Gaudin: Yes testing and lending. I think Ray and I have talked about the results in looking at that.

Comment 16: That is a very interesting point that if certain institutions are using a denial process to then feed into the predatory or pushing the predatory product on the customer. Then you could show the denial was raced based that would be huge.

Rob Gaudin: It would give you institutional names to conduct testing. That is what that is about. We did it in New Mexico and we can do it here if it appears to be the case and that was just last month.

(Presentation)

Comment 17: To me it seems like there is a disconnect between asking people about their perceptions about fair housing law and barriers to access and actually figuring out what to do about the problem. It seems that even if you ask people about their perceptions about barriers it doesn't necessarily lead you to the information about what to do about the problem.

Comment 18: They may not even realize that it is a problem, because they don't know where to go or that they were discriminated against. One of the reasons that we think testing is so important is because discrimination in housing is so elusive that you really don't know. If you go to a place and they tell you that they don't have anything available. How do you know that nothing is available? I mean the only way that you could really know is to test the facility, which is one of the things that we are charged with under the grant from HUD.

Rob Gaudin: I want to emphasize here we have not drawn a random sample of the population to send this too. I have done that. The first one, we went to DMV records and pulled thousands and did mail surveys in the era when mail surveys would work. We get a lot of John Q. Public who doesn't understand what in the world are you talking about. This group is stakeholders, people like yourselves who should have some understating of fair housing. People that are involved in this. We have list of people from bankers, Realtors who have an understanding or at should have an understanding. So we have appealed to them for what are solutions. That is one of the questions on the survey and that is the purpose also of these meetings. What do you think we ought to do?

Comment 19: These responses came from Stakeholders?

Rob Gaudin: That is correct. Largely, but they are also encouraged to send it out. It is not a statically sample, but we have encouraged the stakeholders to forward it to others they might believe would be interested in participating.

Comment 20: Is there any requirement that they participate and when you say stakeholders I am assuming you are referring to non-profits like the Mississippi Center for Justice and local governments.

Rob Gaudin: That is correct.

Comment 21: Do the local governments that would normally receive HUD funds have a requirement to participate.

Comment 22: If they receive one dollar then they have to participate in affirmatively furthering fair housing.

Comment 23: I mean participating in this actual study here, the Analysis.

Comment 24: Yes, they are encouraged.

Comment 25: They are not required?

Comment 26: It is not mandatory, but the State and MDA must certify that we are doing this. So we push that chart. It is like that chain email. Our local units of government, like Rob said is one target that we really need to get in front of. Whether it is mandatory style that before you get a grant that you sit down and talk to us or some mechanism that is going to get them to understand that there is a problem in my area. We had one local official in Tupelo, because he

wanted to be educated and he is concerned about his area, but in Tupelo city hall was two steps down.

Rob Gaudin: We do not have a hammer to hit this nail right now.

Comment 27: We are in the encouraging phase right now.

Comment 28: You don't have a hammer, but there are a lot. Mississippi doesn't have it and I am only talking about the non-profit communities so this does not relate to the failure of officials to participate or rather state agencies. Speaking for the non-profit community even though it isn't there must be a dozen non-profits and six rights here in Jackson that is focused on housing issues. I think you have to be challenged to be creative in your outreach and it is not about a hammer. It is about getting to the people who are.

Rob Gaudin: We are encouraging you, for example if you know someone in these other advocates, non-profits to please forward this to them.

Comment 29: I understand that and I am willing to do that. That is not my job.

Comment 30: That right there that is what we need to stop. It is everybody's job.

Comment 31: I understand. This process is MDA's job and if these meeting continue to have ten, four, whatever peoples in them your outreach approaches is subject to be examined.

Comment 32: It will be examined, but what I am trying to get you to understand.

Comment 33: I am encouraging you to take another approach.

Comment 34: We are encouraging everybody in this room to forward this information. You have an email list. You have a mailing list. You have tenants. Everyone here is a citizen of this state. Not just a stakeholder, you are citizens. So it is not my job or your job. We all have responsibilities. All we are encouraging is provide us with the information.

Comment 35: I said that I would supply a list of people and I will forward anything you send me to everyone I know. So if you will schedule another forum.

Comment 36: We will discuss that.

Comment 37: You make sure that you get a larger amount of participation. So if you take that step.

Comment 38: This is our first wave. We just started and this is what we are now thus far and we will be scheduling some more in August.

Comment 39: What is the timeline for those? What is the time line for this forum process? If this is the first wave, how long will it go?

Comment 40: All the way to October.

Comment 41: These series of forums are mainly for the stakeholders. Am I correct?

Comment 42: The citizens, real estate...

Comment 43: What I am saying you are targeting stakeholders in these particular forums. Are you targeting the stakeholders as well as the Mississippi citizenry?

Comment 44: Yes. This is what this is geared for.

Rob Gaudin: Perhaps I misspoke. The survey was sent largely to a stakeholders group. The survey was a non-randomly drawn sample. It was a judgmental sample, but the public outreach was to invite anyone who would be interested.

Comment 45: We are working on PSAs to even increase it.

Comment 46: I think that the point of the disconnect that to this whole process it appears to me that in times past none of the actual outcry warrant the particular changes that the community or stakeholders requested were to be made. They somehow went unheard. So now you are saying that I need your help now. When we were saying these things that we needed to be done and wanted to be done and wanted to see, none of that ever took place. So now everybody is saying this is sort of like what is the point? I come and we have our pride and nothing ever gets done. A public hearing at a city, the people come here and say we don't want his particular entity or we don't want this to go on. It is kind of like a check box. OK you came, you signed in, we heard you, but we are only going to do what we want to do. We thank you for your participation, but we are going to do what we want to do. That is where I think the disconnect is, because it seems like to problem is growing in the areas and the poverty and the housing is getting worse when these things have been probably been parleyed or shared with MDA over the years. We have had this discussion. The HOME funds we all have said that it should be issued on a need base and not necessarily because you have a blanket amount across the whole state. If I am in Washington County and I need more subsidies to buy a home, why are you going to give me the same that you are going to give somebody in Madison or somebody on the coast receives? That is not fair. I mean I am in a poorer community and I am making less wages. It is harder for me to get along and I need \$30,000 in subsidy, but the state says it will give you \$1499. That is it period. It is statewide. You are kidding. Then why would I come to a meeting and we have been crying this for the last ten years and nothing. You see what I am saying and so now you are asking us to come. I am just showing you one case in point. That is just one case and that is just one of my pet peeves.

Rob Gaudin: Just as a matter of clarification. I think what you are talking about are program guidelines and how certain programs are run and much of that is in the consolidated planning process and some of the Annual Action Plan things. This is slightly different. Whether we have insufficient affordable housing supply. That is actually outside this particular thing. It is how we can make a decision and what are the barriers to us making the decision based on impediments, actions, omissions, or decisions that restrict our housing choice based on those seven protected classes. Just because you do not have enough money to buy the house you want in the community you want right now that is not protected here.

Comment 47: That is what I am saying. What you are saying is to where the disconnect is. The community is not. I know exactly what we are saying as stakeholders, but basically what you just said is problematic and you are talking about fair housing as it relates to race, color, and those things. I don't think we have that big of a problem in Mississippi. I am just going to be honest. I just don't think it is that big of a problem. I think it is more of a financial. I don't you

have that big of a problem when it comes to those seven barriers you just placed there. What was it seven, six?

Comment 48: It is seven categories.

Comment 49: I think seven categories. I just, I don't see too many people being discriminated against due to religion. Race, but...

Rob Gaudin: Remember housing complaints...

Comment 50: Race and disability are the top two categories.

Rob Gaudin: Housing complaints related to rentals were race, disability, gender, and familiar status were the top four here. Then when we found that the infrastructure was not well and people do not have good access and don't go because they do not know where to go, but even with that we have less than 100, but the frequency of those complaints in the rental markets are still there. Race, disability, gender, and familiar status in the order. The other are also there, but they are just less frequent and because the access to the system or the use to the system is limited we really don't know how big of a problem it is. If it is in the compliant data and it says that it is valid we know we have a problem. I can't go away and believe. This is your opinion and you are certainly entitled to your opinion, but I can't say that there is no problem here because the data doesn't say that to me, the researcher.

Comment 51: If I had to say based on lack of knowledge, if I just put a finger on it and simply because what has been from the government in local entities it has always been since 7, 8, 9 be a homeowner, so there was a lot of credit counseling and those types of things in homeownership, but no knowledge of understanding how you are supposed to obtain that mortgage except getting your credit started. Those are what you mostly finding when they are educating black persons on homeownership. You know get your credit straight, money management. So the problem is they do that or try to do that and their other friends or other people they know may have gotten a mortgage and that may have been in the secondary market. So that is all they know the secondary market. So they go to that secondary market and this guy can help you. That secondary market guy he may not even want to put you in the private market simply because his origination fees back then were 2 or 3.5 percent. So he is not going to try to put you in that. So the education of understanding what and how you should get your mortgage or what to look for as far as being an applicant was not really taught.

Rob Gaudin: That is what we are lacking. I agree with you.

Comment 52: There have been cases recently where certain institutions were providing a bonus to employees for putting individuals into higher risk loans. There was incentive for the employees to put these individuals in these loans. That is an issue as well. It all works together against people of color, it appears.

Rob Gaudin: It does appear to be the case.

Comment 53: It is possible regardless of whether you are renting or trying to purchase. Jackson Housing Authority is the only approved local housing agency that is a Housing Authority in the State of Mississippi and we see it all. That has been since 2009.

Rob Gaudin: Since forever.

Comment 54: This is the beginning of outreach. Not just for the AI, but the state as a whole. Trainings, workshops, and things to really bring people together to learn more.

Comment 55: I think that might be a valuable approach is to actually utilize some CDBG money for that purpose and really build that out.

Comment 56: It all can come out in the document.

Comment 57: Sooner or later.

Rob Gaudin: You can rearrange the pie however you wish.

Comment 58: One thing that you do not have today, you don't have a final document. We are not in here saying this is it. It is beginning and it is going to build from there and we are going to be as inclusive as possible. We have already stated the inclusiveness with our PDD and our PHAs. We are just going to build on that and that in itself is a big shift. I am passionate. Numbers don't lie and those dark blue colors those are true too, but just rest assured and they let me keep typing at MDA we are going to push what the mandate is. Any other questions or comments for Mr. Gaudin?

Comment 60: Get with your zoning people and those people that are in charge with those properties.

Comment 61: Building codes.

Comment 62: The people that are building in those particular areas, the zoning municipality those are the people you really want to talk to.

Comment 63: A lot of the time those issues are found and one thing the state can do is say you just won't get funding from us. I guess the entity you look at the County as well. There are some things that can be done. Sometimes you are fighting the political wheel, but the room stands for itself.

Comment 64: As far as denial reasons.

Rob Gaudin: The denial reasons are included in the document. Generally speaking there is a huge category called missing and it is a requirement. Generally speaking there are seven regulatory agencies and HUD is the one that most frequently has missing, because they do not offer their financial institution advice and generally that is manufactured home providers. The others it is credit is the top one, employment is a top one. What I look at is to see if missing is more frequent or credit is more frequent for certain groups. So far I haven't turned that the same racial and ethnic groups we saw.

Comment 65: I was under the assumption from the origination was based on that loan officer feeling that that application had the time a chance of being approved, not just an application.

Rob Gaudin: The origination refers to the loan was completed. Everybody signed off on it. It was done. The other ones are basically all closures. They didn't get done, except for the ones that are sold off onto the secondary market. So we look at the originations, the loans that were completed, and they signed off and those that were denied. The actions that the institution fully took. The good or bad. Yes. No.

Comment 66: That is extremely high.

Rob Gaudin: That is extremely high. Thirty percent is extremely high for a state.

Comment 67: For actions submitted with origination, felt it had a chance.

Rob Gaudin: The reason I selected 2004, prior to that they had an error in the way in which they classed race. Then Hispanic was a race, which is wrong. So now they have fixed that starting in 2004 the same year that they added they attributes of the loan. That is why we look at 2004 to current.

Comment 68: The new thing that you are going to see with the new AI and the new Consolidated Plan is that you are going to get an update every year. We are going to update this thing every year. You are going to see what we have accomplished. What we have done. We are just going to build on that and that is the only way that you can do it. It is not a document that is going to be closed and you are like OK. That is it we did it. We are going to have something to show and may be in the next five years if we get Rob again, those colors would be a lot lighter. No more dark blues.

Rob Gaudin: There was talk at another meeting that we don't a fair housing law. If there was we don't have a group that would be substantially equivalent. If they were substantially equivalent they would be able to go to it. So it is a multiple step process so that might be started somewhere.

Tupelo

Comment 1: On the previous slide the percentage of poverty for 65 and older went down almost 2.8 percent and the poverty expanded in the category above. Is there some correlation between like Medicare or Medicaid and the availability, health insurance premiums, medical benefits that are paid for by 65 and up. Do you have a correlation there?

Rob Gaudin: Well it is hard to attribute precisely the reasons, because this is sample data.

Comment 2: Is that is odd?

Rob Gaudin: No, not necessarily. This under six went up a huge amount in numbers. We have roughly 80,000 more people in poverty. That is a significant distribution.

(Presentation)

Comment 3: We had a lady that said she was disabled and she only needed like a zero or one bedroom. Most of our zero or one bedrooms don't have washer or dryer hookups. They are just small units. They don't have it. She said that we were discriminating against her because she needed a unit that had a washer/dryer hookup, but she didn't qualify for a two bedroom or a larger size. So is that discrimination on our part?

Comment 4: That is a reasonable accommodation to put her in a two.

Comment 5: But we told her if she would get us a doctor's excuse saying she needed a unit that had that.

Comment 6: Is there access to a common area for her?

Comment 7: I could have put her in a bigger unit when she gets to the top of the waiting list, but I have to have some kind of a doctor's excuse saying I have to have a unit because I cannot go outside and hang my clothes out or go to the laundry mat.

Comment 8: Do you receive HUD funds? You should have a percentage of your buildings with that accessibility accommodation. If you have someone in that unit that does not meet that situation, like this lady with the disability takes preference over that person that you have in that unit that fits her needs.

Comment 9: What I am saying is like all of our zero bedrooms and most of our one bedrooms does not have access to washer/dryer and she only qualifies for a zero bedroom.

Comment 10: A tenant can request a reasonable modification of your unit to add washer and dryer hookups.

Comment 11: OK.

Comment 12: Now they can be temporary.

Comment 13: But if there is no place to put one?

Comment 14: Because if she leaves then that tenant is responsible for bringing that unit back to its original state.

Comment 15: The question you didn't automatically ask is are you willing to pay for the modification?

Comment 16: OK.

Rob Gaudin: Other questions?

Comment 17: It sound like it would be easier to put her in a bigger unit with a washer/dryer hookup. That is not going to cost you any money and that is one of the things to look at. Would this benefit me financially and it would not, it would be to put her in a two bedroom unit.

Comment 18: As long as I had documentation that she needed, she could not go outside, because would that not be discrimination against someone who just wanted a two bedroom?

Comment 19: She is a protected class.

Comment 20: Yeah.

Rob Gaudin: That assumes that the disability is valid.

(Presentation)

Comment 21: Do you think that is a result of Dodd Frank legislation?

Rob Gaudin: No.

Comment 22: You don't think that that has had any impact on the denial rate, Dodd Frank regulation?

Rob Gaudin: Other jurisdictions have gone down and other jurisdictions have seen other things go on. So this is little bit different. The point where I am going is when this HMDA act initiated, they reported certain things. Not just what they decided to do, but the race, gender, the ethnicity of the applicant, the income and so on. So we have some idea about who is getting denied.

(Presentation)

Comment 23: I have a question and it might not exactly relate to this. I don't work in the housing sector or anything like that, but in my community we have people that rent mobile homes. You know the mobile homes are probably rented for \$125 a week and it is probably a \$2,500 mobile home. Does the county or city have zones. Do they have zoning in place or is there any way to control stuff like that. People are living in these mobile homes that windows are out of them and basically you are seeing them in minorities and mixed race marriages. Low-income housing with children running around without adequate clothing. Is there not public housing available? I understand that some portion of this is probably because one of the parents may have a felony or something and they cannot get into public housing. Is there any way to control people that rent housing that actually should be condemned, but yet low-income families are living in them?

Rob Gaudin: That is a complicated question.

Comment 24: We are seeing more and more of that in our area and it is a sad fact that you are seeing in this time that we live in that people are in those types of conditions.

Comment 25: Our town is trying to pass a rental ordinance. Kind of like what Tupelo did several years ago. We are trying to curb that, because they were renting like you say something that you wouldn't live in for \$125 a week. It is mostly people like you say that maybe the husband has a felony or they have such bad credit or they have been evicted from a housing authority and they have nowhere else to go.

Comment 26: People are constantly calling about finding places to live. They are living in these.

Comment 27: They will call us and say is there not something that somebody can do to fix my water or something. I will ask them what does your lease say? Does your landlord and some of them don't actually have a lease.

Comment 28: They came, come in and their clothes are thrown out the door. It is just sad.

Comment 29: That could be an impediment situation. Number one the local unit of government, particularly if they receive federal funds, they are in charge of affirmatively furthering fair housing. Now if it is a private landlord.

Comment 30: This is all private.

Comment 31: That is one of the impediments. That is the group that we need to reach to inform them and inform those tenants, here are your rights here. Don't just take what the landlord says or is allowing you not to do. Here are your rights. We can inform the tenants. We

can inform the landlord. We can inform the local unit of government and bring that part together and make that situation a whole lot better. That is what this is about.

Comment 32: So the local unit of government if they get HUD funds for anything can say to Mr. Landlord that you will do it this way.

Comment 33: They need to have a talk with him or her. That is one thing that we are trying to beef up at MDA. That outreach and education. Particularly when we complete this new study, it is going to be a more stringent process with that grant like section. Those local units of government are going to have to do that outreach, do those activities, and inform their citizens about fair housing. That is how we bring those numbers down and with everyone here we can make that happen.

Comment 34: Does most public housing have available apartments for rent? Usually most of the time when I try to refer them there is a waiting list. Most of them are always at capacity?

Comment 35: Over capacity pretty much.

Comment 36: Most of the time most housing authorities are between 97 and 100 percent occupied and even our vouchers. We don't have enough vouchers.

Comment 37: It seems to me that and our community it is like there is no available housing. It is terrible. I don't know what the answer is.

Comment 38: They have to do references and they do criminal background checks. If people have a felony in X amount of years then they are not eligible. They owe other housing authorities money.

Comment 39: Is there never a way that a felon can get into public housing?

Comment 40: Well after a certain number of years they are eligible. HUD says that you are mandatorily not eligible within a certain time frame. It is pretty short. If you have been convicted for the production of crystal meth, you are never eligible. That is a lifetime thing. If you are a registered sex offender you can't be housed period. There are a few things that you can't get in public housing.

Comment 41: I don't know if other communities in your county, in the six counties that we serve there is not adequate housing in any county that we serve.

Comment 42: That is an impediment. What can be done for that? Another thing that came up, desegregation of populated areas where there is a concentration of protected classes. That is what the HUD fund is all about. Integrating those areas and spreading people out. I think there is a study that showed or compared that people want to live with the same race. People want to live where they can thrive. Where they can flourish in. That is the intent of fair housing laws is to desegregate those areas, spread the funding out, and we are going to be looking into that as well. What those dark green spots where particularly when we complete the study in as far as fair housing outreach. Denial rates and HUD is looking at us like that. They are saying you know about this and what are you doing? We can't just sit there.

Comment 43: Is the federal government looking at putting any money into expanding units available for these lower income people?

Comment 44: That is a question for that particular group, but I know and hope that our funding can increased particularly on the HOME to really make an impact on affordable housing. It is shrinking day by day and day by day we don't know what is going to happen. We still must march forward and to make sure that we tackle what we need to tackle. Any questions or concerns or issues that may pop out that we need to talk about now?

Comment 45: I am not sure if this is for what you need to hear now, but I was just wondering about the lack of housing and the responsibility of local government and possibly educating the local officials about that responsibility, because I know that enforcing a housing code is very difficult. It is different from a building code where you have a building inspector, but housing code is very difficult and then it comes down to when you have to go to court to it leans more towards the property owner, the landlord. You know there are just problems there.

Comment 46: That is one of our staff talks about all the time that those local units, mayors and we have one here today, the board of supervisors. We are working to get in their face. We have just been informed about the conference they are having on the cost. That may be one, but we can schedule our own outreach opportunity and in particular with grant awards we can make it mandatory to be there to talk and go over some things. That way they hear it from us and not being filtered through another source and they just blow it off. It is building it, providing the information, providing the guidance, and that is the way it is going to get better.

Comment 47: I do identify with everything that you are saying.

Comment 48: This is our first official forum for citizens and PHA's. You all are citizens of this state and when you go back to your offices think of questions, think of impediments, and jot them down and we will have the opportunity to provide those edits. We are going to give somebody some homework assignments. Our PHA's and our planning districts we need 100 percent participation from all of your staff in taking that survey. That is number one. We do have an email notification that we can forward to you all and you can forward it.

(Presentation)

D. ADDITIONAL CENSUS AND COMPLAINT TABLES

Table D.1
Cost Burden and Severe Cost Burden by Tenure

Non-Entitlement Area of Mississippi
 2000 Census & 2012 Five-Year ACS Data

Data Source	Less Than 30%		31%-50%		Above 50%		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage									
2000 Census	205,135	73.1%	43,069	15.3%	29,683	10.6%	2,872	1.0%	280,759
2011 Five-Year ACS	249,425	66.9%	70,860	19.0%	49,784	13.4%	2,521	0.7%	372,590
Owner Without a Mortgage									
2000 Census	148,656	84.7%	12,780	7.3%	8,869	5.1%	5,114	2.9%	175,419
2011 Five-Year ACS	265,212	84.1%	27,325	8.7%	18,201	5.8%	4,707	1.5%	315,445
Renter									
2000 Census	110,338	50.7%	35,073	16.1%	35,701	16.4%	36,625	16.8%	217,737
2011 Five-Year ACS	101,470	38.8%	54,210	20.7%	56,557	21.6%	49,453	18.9%	261,690
Total									
2000 Census	464,129	68.9%	90,922	13.5%	74,253	11.0%	44,611	6.6%	673,915
2011 Five-Year ACS	616,107	64.9%	152,395	16.0%	124,542	13.1%	56,681	6.0%	949,725

Table D.2
Fair Housing Complaints by Issue

Non-Entitlement Area of Mississippi
2004–2014 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	Total
Discrimination in term, conditions or privileges relating to rental	18	11	14	8	30	22	22	7	11	3		146
Discriminatory terms, conditions, privileges, or services and facilities	6	3	7	16	16	2	6	3	6	5	1	71
Discriminatory refusal to rent	6	2	4	3	14	5	16	8	6	1		65
Discriminatory acts under Section 818 (coercion, etc.)	13	7	5	6	11	4	4	4	4	5		63
Failure to make reasonable accommodation	5	5	3	4	8	10	2	2	6	1		46
Discriminatory advertising, statements and notices	2		2		2	5	6	2	5	2		26
Otherwise deny or make housing available	1		1				4	2	6	4	1	19
Discriminatory financing (includes real estate transactions)			1	4	7	1	1	1		1		16
Discrimination in the terms or conditions for making loans	3			4	3	1						11
Discrimination in terms, conditions, privileges relating to sale		4	1		2	3	1					11
False denial or representation of availability - rental	1	1			1	1	3		2			9
Discriminatory refusal to rent and negotiate for rental	1		1	1	1	2	2					8
Refusing to provide municipal services or property				1	1	5	1					8
Failure to permit reasonable modification	2	1			1	1		1	1			7
Discriminatory refusal to sell and negotiate for sale	1	1	1		1		2					6
Using ordinances to discriminate in zoning and land use		1				4	1					6
Discriminatory refusal to sell		1	1		1		1			1		5
Discrimination in the selling of residential real property			1	1	2	1						5
Discrimination in services and facilities relating to rental				1	1	1	2					5
Discriminatory refusal to negotiate for sale	1	1			2							4
Steering		1		1		1				1		4
Non-compliance with design and construction requirements (handicap)						1	2		1			4
Discriminatory refusal to negotiate for rental		1				1	1					3
False denial or representation of availability - sale	1		1						1			3
Discrimination in making of loans				1	1		1					3
Failure to provide an accessible building entrance							2		1			3
Failure to provide usable doors						1	1		1			3
Failure to provide an accessible route into and thru the covered unit							2		1			3
Failure to provide usable kitchens and bathrooms						1	1		1			3
Discriminatory advertisement - rental						1	1					2
Discrimination in services and facilities relating to sale		1			1							2
Other discriminatory acts							1		1			2
Use of discriminatory indicators	1				1							2
Discriminatory advertising - sale		1										1
False denial or representation of availability					1							1
Discrimination in the brokering of residential real property	1											1
Failure to provide accessible and usable public and common user areas							1					1
Total Issues	63	42	43	51	108	74	87	30	54	24	2	578
Total Complaints	41	29	29	32	69	38	44	16	21	9	1	329

Table D.3
Fair Housing Complaints by Closure Status

Non-Entitlement Area of Mississippi
 2004–2014 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	Total
No Cause	22	11	10	13	30	10	24	5	11	5		141
Withdrawal After Resolution	7	1	2	8	16	10	9	2				55
Conciliated / Settled	3	3	9	2	6	3	3	3	6	3	1	42
Complainant Failed to Cooperate	3	5		3	6	5	2	3	1			28
Withdrawal Without Resolution	3	6	1	2	4	3	2		2			23
Lack of Jurisdiction		2		2	5	5	3	1	1			19
Unable to Locate Respondent	3		3	2	1	1	1	1		1		13
Election Made to Go to Court			1		1	1		1				4
Untimely Filed		1	1									2
FHAP Judicial Consent Order			1									1
Trial has Begun			1									1
Total Complaints	41	29	29	32	69	38	44	16	21	9	1	329

Table D.4
Fair Housing Complaints Found With Cause by Issue

Non-Entitlement Area of Mississippi
 2004–2014 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	Total
Discrimination in term, conditions or privileges relating to rental	2	2	6	3	10	8	6	1	4	1		43
Discriminatory terms, conditions, privileges, or services and facilities	2		3	7	6	1	1	1	1	2	1	25
Failure to make reasonable accommodation	5		1		2	6	2	1		1		18
Discriminatory refusal to rent			1		5	3	2	2	2			15
Discriminatory acts under Section 818 (coercion, etc.)	3	2	1	1	1			1	2	2		13
Discriminatory advertising, statements and notices	1					2	1	1	1	1		7
Otherwise deny or make housing available								1	1	3	1	6
Discriminatory refusal to rent and negotiate for rental	1					1	1					3
False denial or representation of availability - rental						1	1		1			3
Discriminatory financing (includes real estate transactions)					1		1	1				3
Failure to provide an accessible building entrance							2					2
Failure to permit reasonable modification	1	1										2
Discriminatory refusal to sell					1							1
Discriminatory refusal to negotiate for rental						1						1
Discrimination in making of loans							1					1
Discrimination in the terms or conditions for making loans				1								1
Discrimination in the selling of residential real property				1								1
Steering						1						1
Refusing to provide municipal services or property						1						1
Non-compliance with design and construction requirements (handicap)							1					1
Failure to provide accessible and usable public and common user areas							1					1
Failure to provide usable doors							1					1
Failure to provide an accessible route into and thru the covered unit							1					1
Failure to provide usable kitchens and bathrooms							1					1
Total Issues	15	5	12	13	26	25	23	9	12	10	2	152
Total Complaints	10	4	11	10	22	13	12	5	6	3	1	97

E. ADDITIONAL HMDA TABLES

Table E.1
Owner-Occupied Home Purchase Loan Applications by Loan Type

Non-Entitlement Area of Mississippi
2004–2012 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Conventional	56,589	65,090	61,894	47,270	22,634	15,320	17,062	18,020	19,953	323,832
FHA - Insured	8,200	8,024	8,939	6,146	10,587	11,844	11,540	9,727	8,848	83,855
VA - Guaranteed	2,283	2,047	2,293	1,983	2,096	2,384	2,374	2,369	2,533	20,362
Rural Housing Service or Farm Service Agency	936	861	949	2,269	4,383	5,790	4,983	5,349	5,814	31,334
Total	68,008	76,022	74,075	57,668	39,700	35,338	35,959	35,465	37,148	459,383

Table E.2
Loan Applications by Action Taken

Non-Entitlement Areas of Mississippi
2004–2012 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Loan Originated	28,133	31,033	32,492	25,869	18,045	15,527	14,255	13,631	14,733	193,718
Application Approved but not Accepted	5,125	5,311	5,190	3,588	1,897	1,056	1,959	2,931	2,578	29,635
Application Denied	12,476	12,837	14,064	10,070	6,675	4,829	7,315	7,591	8,578	84,435
Application Withdrawn by Applicant	4,201	6,634	4,587	3,035	2,194	1,883	1,984	1,555	1,719	27,792
File Closed for Incompleteness	1,074	1,383	1,490	1,186	590	561	502	420	330	7,536
Loan Purchased by the Institution	16,999	18,554	16,239	13,915	10,298	11,479	9,943	9,337	9,205	115,969
Preapproval Request Denied	0	269	5	5	1	3	1	0	3	287
Preapproval Approved but not Accepted	0	1	8	0	0	0	0	0	2	11
Total	68,008	76,022	74,075	57,668	39,700	35,338	35,959	35,465	37,148	459,383
Denial Rate	30.7%	29.3%	30.2%	28.0%	27.0%	23.7%	33.9%	35.8%	36.8%	30.4%

Table E.3
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 Non-Entitlement Area of Mississippi
 2004–2012 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
American Indian	Originated	78	94	70	64	38	21	22	30	32	449
	Denied	45	47	56	28	37	21	41	26	50	351
	Denial Rate	36.6%	33.3%	44.4%	30.4%	49.3%	65.1%	65.1%	46.4%	61.0%	43.9%
Asian	Originated	347	427	479	392	228	231	191	216	195	2,706
	Denied	112	104	129	85	86	62	61	48	67	754
	Denial Rate	24.4%	19.6%	21.2%	17.8%	27.4%	21.2%	24.2%	18.2%	25.6%	21.8%
Black	Originated	4,970	6,348	6,665	4,930	2,904	2,487	2,540	2,194	2,272	35,310
	Denied	4,177	4,470	4,944	3,563	1,979	1,432	2,506	2,704	3,340	29,115
	Denial Rate	45.7%	41.3%	42.6%	42.0%	40.5%	36.5%	49.7%	55.2%	59.5%	45.2%
White	Originated	21,071	22,385	23,174	19,117	14,135	12,306	11,097	10,813	11,907	146,005
	Denied	6,526	6,734	7,335	5,401	4,022	3,007	4,209	4,242	4,515	45,991
	Denial Rate	23.6%	23.1%	24.0%	22.0%	22.2%	19.6%	27.5%	28.2%	27.5%	24.0%
Not Available	Originated	1,633	1,770	2,100	1,358	728	476	401	375	321	9,162
	Denied	1,596	1,476	1,596	992	519	307	497	570	604	8,157
	Denial Rate	49.4%	45.5%	43.2%	42.2%	41.6%	39.2%	55.3%	60.3%	65.3%	47.1%
Not Applicable	Originated	34	9	4	8	12	6	4	3	6	86
	Denied	20	6	4	1	32	0	1	1	2	67
	Denial Rate	49.4%	45.5%	43.2%	42.2%	41.6%	39.2%	55.3%	60.3%	65.3%	43.8%
Total	Originated	28,133	31,033	32,492	25,869	18,045	15,527	14,255	13,631	14,733	193,718
	Denied	12,476	12,837	14,064	10,070	6,675	4,829	7,315	7,591	8,578	84,435
	Denial Rate	30.7%	29.3%	30.2%	28.0%	27.0%	23.7%	33.9%	35.8%	36.8%	30.4%
Non-Hispanic	Originated	23,288	28,498	29,916	24,099	17,031	14,757	13,625	12,943	14,016	178,173
	Denied	9,480	10,812	11,873	8,804	5,898	4,357	6,395	6,171	6,935	70,725
	Denial Rate	28.9%	27.5%	28.4%	26.8%	25.7%	22.8%	31.9%	32.3%	33.1%	28.4%
Hispanic	Originated	462	527	563	394	241	192	168	186	208	2,941
	Denied	374	246	238	193	102	89	106	89	120	1,557
	Denial Rate	44.7%	31.8%	29.7%	32.9%	29.7%	31.7%	38.7%	32.4%	36.6%	34.6%

Table E.4
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant

Non-Entitlement Area of Mississippi
 2004–2012 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	47	148	3,127	5,200	727	3	9,252	163
Employment History	6	22	222	669	92	0	1,011	27
Credit History	129	174	9,588	15,182	2,038	8	27,119	428
Collateral	13	37	796	2,470	365	1	3,682	71
Insufficient Cash	6	11	301	692	105	0	1,115	30
Unverifiable Information	6	35	672	841	163	7	1,724	36
Credit Application Incomplete	10	62	931	1,858	337	0	3,198	56
Mortgage Insurance Denied	0	1	22	29	9	0	61	0
Other	18	61	1,942	2,901	786	4	5,712	96
Missing	116	203	11,514	16,149	3,535	44	31,561	650
Total	351	754	29,115	45,991	8,157	67	84,435	1,557
% Missing	33.0%	26.9%	39.5%	35.1%	43.3%	65.7%	37.4%	41.7%

Table E.5
Loan Applications by Selected Action Taken by Gender of Applicant

Non-Entitlement Area of Mississippi
 2004–2012 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Male	Originated	19,485	20,980	21,991	17,754	12,655	10,760	9,714	9,414	10,439	133,192
	Denied	7,197	7,296	7,979	5,826	3,910	2,973	4,131	4,210	4,728	48,250
	Denial Rate	27.0%	25.8%	26.6%	24.7%	23.6%	21.6%	29.8%	30.9%	31.2%	26.6%
Female	Originated	7,944	9,278	9,565	7,387	4,962	4,464	4,287	3,991	4,116	55,994
	Denied	4,483	4,785	5,223	3,657	2,379	1,671	2,919	2,980	3,477	31,574
	Denial Rate	36.1%	34.0%	35.3%	33.1%	32.4%	27.2%	40.5%	42.7%	45.8%	36.1%
Not Available	Originated	690	764	932	715	416	297	250	223	172	4,459
	Denied	796	750	857	585	351	185	264	400	371	4,559
	Denial Rate	53.6%	49.5%	47.9%	45.0%	45.8%	38.4%	51.4%	64.2%	68.3%	50.6%
Not Applicable	Originated	14	11	4	13	12	6	4	3	6	73
	Denied	0	6	5	2	35	0	1	1	2	52
	Denial Rate	0.0%	35.3%	55.6%	13.3%	74.5%	0.0%	20.0%	25.0%	25.0%	41.6%
Total	Originated	28,133	31,033	32,492	25,869	18,045	15,527	14,255	13,631	14,733	193,718
	Denied	12,476	12,837	14,064	10,070	6,675	4,829	7,315	7,591	8,578	84,435
	Denial Rate	30.7%	29.3%	30.2%	28.0%	27.0%	23.7%	33.9%	35.8%	36.8%	30.4%

Table E.6
Loan Applications by Income of Applicant: Originated and Denied

Non-Entitlement Area of Mississippi
 2004–2012 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
\$15,000 or Below	Loan Originated	568	391	435	318	172	131	130	90	86	2,321
	Application Denied	1,268	937	790	519	367	284	520	444	539	5,668
	Denial Rate	69.1%	70.6%	64.5%	62.0%	68.1%	68.4%	80.0%	83.1%	86.2%	70.9%
\$15,001–\$30,000	Loan Originated	5,126	5,011	4,449	3,388	2,052	2,006	2,176	1,857	1,880	27,945
	Application Denied	4,622	4,561	4,289	2,941	1,854	1,366	2,529	2,620	2,849	27,631
	Denial Rate	47.4%	47.6%	49.1%	46.5%	47.5%	40.5%	53.8%	58.5%	60.2%	49.7%
\$30,001–\$45,000	Loan Originated	6,828	7,327	7,427	5,730	4,031	3,901	3,468	3,128	3,328	43,720
	Application Denied	3,015	3,207	3,593	2,542	1,693	1,300	1,877	1,920	2,206	21,353
	Denial Rate	30.6%	30.4%	32.6%	30.7%	29.6%	25.0%	35.1%	38.0%	39.9%	32.8%
\$45,001–\$60,000	Loan Originated	5,457	6,055	6,344	5,065	3,656	3,090	2,682	2,538	2,713	36,767
	Application Denied	1,793	1,824	2,340	1,625	1,158	797	1,072	1,083	1,321	13,013
	Denial Rate	24.7%	23.2%	26.9%	24.3%	24.1%	20.5%	28.6%	29.9%	32.7%	26.1%
\$60,001–\$75,000	Loan Originated	3,564	4,123	4,473	3,598	2,462	2,087	1,873	1,910	2,022	25,970
	Application Denied	675	873	1,122	888	588	432	511	571	648	6,308
	Denial Rate	15.9%	17.5%	20.1%	19.8%	19.3%	17.1%	21.4%	23.0%	24.3%	19.5%
Above \$75,000	Loan Originated	6,088	7,336	8,545	7,444	5,465	4,134	3,822	3,957	4,555	48,671
	Application Denied	863	1,258	1,709	1,426	925	581	719	804	953	9,238
	Denial Rate	12.4%	14.6%	16.7%	16.1%	14.5%	12.3%	15.8%	16.9%	17.3%	16.0%
Data Missing	Loan Originated	502	790	819	326	207	178	104	151	149	4,957
	Application Denied	240	177	221	129	90	69	87	149	62	1,224
	Denial Rate	32.3%	18.3%	21.3%	28.4%	30.3%	27.9%	45.5%	49.7%	29.4%	19.8%
Total	Loan Originated	28,133	31,033	32,492	25,869	18,045	15,527	14,255	13,631	14,733	193,718
	Application Denied	12,476	12,837	14,064	10,070	6,675	4,829	7,315	7,591	8,578	84,435
	Denial Rate	30.7%	29.3%	30.2%	28.0%	27.0%	23.7%	33.9%	35.8%	36.8%	30.4%

Table E.7
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied

Non-Entitlement Area of Mississippi
 2004–2012 HMDA Data

Race		<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	> \$75K	Data Missing	Total
American Indian	Loan Originated	2	93	102	76	45	120	11	449
	Application Denied	19	95	82	69	31	50	5	351
	Denial Rate	90.5%	50.5%	44.6%	47.6%	40.8%	29.4%	31.3%	43.9%
Asian	Loan Originated	22	284	518	521	379	904	78	2,706
	Application Denied	34	183	174	133	58	140	32	754
	Denial Rate	60.7%	39.2%	25.1%	20.3%	13.3%	13.4%	29.1%	21.8%
Black	Loan Originated	748	8,667	10,186	6,566	3,724	5,107	312	35,310
	Application Denied	2,654	11,718	7,074	3,611	1,664	2,091	303	29,115
	Denial Rate	78.0%	57.5%	41.0%	35.5%	30.9%	29.0%	49.3%	45.2%
White	Loan Originated	1,352	17,771	32,452	28,643	20,646	42,678	2,463	146,005
	Application Denied	2,396	13,033	12,105	7,923	3,978	5,970	586	45,991
	Denial Rate	63.9%	42.3%	27.2%	21.7%	16.2%	12.3%	19.2%	24.0%
Not Available	Loan Originated	195	1,121	1,909	1,790	1,311	2,518	318	9,162
	Application Denied	563	2,589	1,913	1,272	577	982	261	8,157
	Denial Rate	74.3%	69.8%	50.1%	41.5%	30.6%	28.1%	45.1%	47.1%
Not Applicable	Loan Originated	2	9	1	4	7	19	44	86
	Application Denied	2	13	5	5	0	5	37	67
	Denial Rate	50.0%	59.1%	83.3%	55.6%	0.0%	20.8%	45.7%	43.8%
Total	Loan Originated	2,321	27,945	45,168	37,600	26,112	51,346	3,226	193,718
	Application Denied	5,668	27,631	21,353	13,013	6,308	9,238	1,224	84,435
	Denial Rate	70.9%	49.7%	32.8%	26.1%	19.5%	16.0%	19.8%	30.4%
Non-Hispanic	Loan Originated	2,031	25,530	41,627	34,658	24,059	47,497	2,771	178,173
	Application Denied	4,654	23,002	18,036	10,914	5,425	7,857	837	70,725
	Denial Rate	69.6%	47.4%	30.2%	23.9%	18.4%	14.2%	23.2%	28.4%
Hispanic	Loan Originated	31	548	739	585	342	640	56	2,941
	Application Denied	106	498	444	253	93	142	21	1,557
	Denial Rate	77.4%	47.6%	37.5%	30.2%	21.4%	18.2%	27.3%	34.6%

Table E.8
Loans by Loan Purpose by HAL Status
 Non-Entitlement Area of Mississippi
 2004–2012 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Home Purchase	Other	20,503	20,483	21,462	19,483	13,725	12,605	12,669	12,020	12,951	145,901
	HAL	7,630	10,550	11,030	6,386	4,320	2,922	1,586	1,611	1,782	47,817
	Percent HAL	27.1%	34.0%	33.9%	24.7%	23.9%	18.8%	11.1%	11.8%	12.1%	24.7%
Home Improvement	Other	4,836	4,436	5,059	5,514	4,495	3,905	4,389	3,896	4,061	40,591
	HAL	1,933	1,880	1,874	1,934	1,520	1,151	214	223	212	10,941
	Percent HAL	28.6%	29.8%	27.0%	26.0%	25.3%	22.8%	4.6%	5.4%	5.0%	21.2%
Refinancing	Other	21,238	15,175	13,174	15,212	15,367	24,347	24,489	20,240	27,441	176,683
	HAL	11,206	10,860	10,829	9,424	8,237	6,286	762	1,068	1,244	59,916
	Percent HAL	34.5%	41.7%	45.1%	38.3%	34.9%	20.5%	3.0%	5.0%	4.3%	25.3%
Total	Other	46,577	40,094	39,695	40,209	33,587	40,857	41,547	36,156	44,453	363,175
	HAL	20,769	23,290	23,733	17,744	4,320	2,922	1,586	1,611	1,782	159,889
	Percent HAL	30.8%	36.7%	37.4%	30.6%	29.5%	20.2%	5.8%	7.4%	6.8%	30.6%

Table E.9
Loans by HAL Status by Race/Ethnicity of Borrower

Non-Entitlement Area of Mississippi
2004–2012 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
American Indian	Other	57	55	38	50	30	18	16	29	28	321
	HAL	21	39	32	14	8	3	6	1	4	128
	Percent HAL	26.9%	41.5%	45.7%	21.9%	21.1%	14.3%	27.3%	3.3%	12.5%	28.5%
Asian	Other	294	339	380	335	189	198	186	201	181	2,504
	HAL	53	88	99	57	39	33	5	15	14	403
	Percent HAL	15.3%	20.6%	20.7%	14.5%	17.1%	14.3%	2.6%	6.9%	7.2%	13.9%
Black	Other	2,789	2,732	3,171	3,169	2,039	2,039	2,128	1,807	1,770	21,644
	HAL	2,181	3,616	3,494	1,761	865	448	412	387	502	13,666
	Percent HAL	43.9%	57.0%	52.4%	35.7%	29.8%	18.0%	16.2%	17.6%	22.1%	38.7%
White	Other	16,297	16,377	16,697	14,942	10,816	9,906	9,956	9,657	10,718	115,366
	HAL	4,774	6,008	6,477	4,175	3,319	2,400	1,141	1,156	1,189	30,639
	Percent HAL	22.7%	26.8%	27.9%	21.8%	23.5%	19.5%	10.3%	10.7%	10.0%	21.0%
Not Available	Other	1,038	973	1,172	980	639	438	379	323	248	6,190
	HAL	595	797	928	378	89	38	22	52	73	2,972
	Percent HAL	36.4%	45.0%	44.2%	27.8%	12.2%	8.0%	5.5%	13.9%	16.2%	32.4%
Not Applicable	Other	28	7	4	7	12	6	4	3	6	77
	HAL	6	2	0	1	0	0	0	0	0	9
	Percent HAL	17.6%	22.2%	0.0%	12.5%	0.0%	0.0%	0.0%	0.0%	0.0%	10%
Total	Other	20,503	20,483	21,462	19,483	13,725	12,605	12,669	12,020	12,951	145,901
	HAL	7,630	10,550	11,030	6,386	4,320	2,922	1,586	1,611	1,782	47,817
	Percent HAL	27.1%	34.0%	33.9%	24.7%	23.9%	18.8%	11.1%	11.8%	12.1%	24.7%
Non-Hispanic	Other	16,946	19,057	20,110	18,192	12,866	11,964	12,124	11,543	12,519	135,321
	HAL	6,342	9,441	9,806	5,907	4,165	2,793	1,501	1,400	1,497	42,852
	Percent HAL	27.2%	33.1%	32.8%	24.5%	24.5%	18.9%	11.0%	10.8%	10.7%	24.1%
Hispanic	Other	308	343	336	302	193	151	156	165	183	2,137
	HAL	154	184	227	92	48	41	12	21	25	804
	Percent HAL	33.3%	34.9%	40.3%	23.4%	19.9%	21.4%	7.1%	11.3%	12.0%	27.3%

Table E.10
Rates of HALs by Income of Borrower
 Non-Entitlement Area of Mississippi
 2004–2012 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	2012	Average
\$15,000 or Below	53.7%	62.1%	45.5%	46.2%	62.8%	48.1%	33.8%	33.3%	40.7%	50.9%
\$15,001–\$30,000	42.7%	50.9%	49.9%	41.0%	41.5%	29.1%	22.8%	24.9%	27.3%	41.2%
\$30,001–\$45,000	29.5%	39.3%	39.1%	27.9%	25.7%	17.1%	13.1%	14.6%	15.7%	28.7%
\$45,001 –\$60,000	25.0%	33.6%	33.3%	23.6%	21.9%	17.5%	9.8%	10.7%	11.4%	24.6%
\$60,001–\$75,000	19.3%	26.6%	29.1%	19.1%	19.4%	15.3%	7.0%	8.9%	7.4%	20.2%
Above \$75,000	16.2%	21.4%	23.6%	17.2%	18.6%	17.2%	5.1%	5.5%	5.4%	17.1%
Data Missing	17.1%	23.0%	34.6%	26.1%	15.5%	18.5%	2.9%	2.0%	3.4%	23.0%
Average	27.1%	34.0%	33.9%	24.7%	23.9%	18.8%	11.1%	11.8%	12.1%	24.7%

Table E.11
Loans by HAL Status by Income of Borrower

Non-Entitlement Area of Mississippi
 2004–2012 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
\$15,000 or Below	Other	263	148	237	171	64	68	86	60	51	1,097
	HAL	305	243	198	147	108	63	44	30	35	1,138
	Percent HAL	53.7%	62.1%	45.5%	46.2%	62.8%	48.1%	33.8%	33.3%	40.7%	50.9%
\$15,001–\$30,000	Other	2,939	2,461	2,228	1,999	1,201	1,422	1,680	1,395	1,366	15,325
	HAL	2,187	2,550	2,221	1,389	851	584	496	462	514	10,740
	Percent HAL	42.7%	50.9%	49.9%	41.0%	41.5%	29.1%	22.8%	24.9%	27.3%	41.2%
\$30,001–\$45,000	Other	4,811	4,451	4,525	4,130	2,996	3,232	3,014	2,671	2,805	29,830
	HAL	2,017	2,876	2,902	1,600	1,035	669	454	457	523	12,010
	Percent HAL	29.5%	39.3%	39.1%	27.9%	25.7%	17.1%	13.1%	14.6%	15.7%	28.7%
\$45,001–\$60,000	Other	4,094	4,021	4,232	3,870	2,854	2,548	2,419	2,267	2,404	26,305
	HAL	1,363	2,034	2,112	1,195	802	542	263	271	309	8,582
	Percent HAL	25.0%	33.6%	33.3%	23.6%	21.9%	17.5%	9.8%	10.7%	11.4%	24.6%
\$60,001–\$75,000	Other	2,877	3,027	3,172	2,909	1,985	1,767	1,741	1,740	1,872	19,218
	HAL	687	1,096	1,301	689	477	320	132	170	150	4,872
	Percent HAL	19.3%	26.6%	29.1%	19.1%	19.4%	15.3%	07.0%	8.9%	7.4%	20.2%
Above \$75,000	Other	5,103	5,767	6,532	6,163	4,450	3,423	3,628	3,739	4,309	38,805
	HAL	985	1,569	2,013	1,281	1,015	711	194	218	246	7,986
	Percent HAL	16.2%	21.4%	23.6%	17.2%	18.6%	17.2%	5.1%	5.5%	5.4%	17.1%
Data Missing	Other	416	608	536	241	175	145	101	148	144	2,370
	HAL	86	182	283	85	32	33	3	3	5	707
	Percent HAL	17.1%	23.0%	34.6%	26.1%	15.5%	18.5%	2.9%	2.0%	3.4%	23.0%
Total	Other	20,503	20,483	21,462	19,483	13,725	12,605	12,669	12,020	12,951	145,901
	HAL	7,630	10,550	11,030	6,386	4,320	2,922	1,586	1,611	1,782	47,817
	Percent HAL	27.1%	34.0%	33.9%	24.7%	23.9%	18.8%	11.1%	11.8%	12.1%	24.7%

2012 DENIAL RATES BY LENDER

Table E.12
Lenders with High Denial Rates to Black Applicants
 Non-Entitlement Area of Mississippi
 2012 HMDA Data

Name	Loans Originated	Loans Denied	Denial Rate
Vanderbilt Mortgage	116	1,293	91.8%
21st Mortgage	209	804	79.4%
First Federal Bank	6	120	95.2%
Acceptance Loan Company	3	106	97.2%
US Bank, N.A.	29	81	73.6%
Clayton Bank and Trust	42	69	62.2%
Keesler Federal Credit Union	5	53	91.4%
Total	410	2,526	.
Percent of All Loans	18.0%	75.6%	.

Table E.13
Lenders with High Denial Rates to Black Applicants
 Non-Entitlement Area of Mississippi
 2012 HMDA Data

Lender	Race	Loans Originated	Loans Denied	Denial Rate
Vanderbilt Mortgage	Black	116	1,293	91.8%
	White	172	890	83.8%
21st Mortgage	Black	209	804	79.4%
	White	336	993	74.7%
Acceptance Loan Company	Black	3	106	97.2%
	White	5	38	88.4%
First Federal Bank	Black	6	120	95.2%
	White	61	179	74.6%
US Bank, N.A.	Black	29	81	73.6%
	White	196	256	56.6%
Clayton Bank and Trust	Black	42	69	62.2%
	White	84	107	56.0%
Keesler Federal Credit Union	Black	5	53	91.4%
	White	79	245	75.6%

2012 PREDATORY STYLE LENDING BY LENDER

Table E.14
Predatory Loans to Black Applicants
 Non-Entitlement Area of Mississippi
 2012 HMDA Data

Lender Name	Regular Loan	HAL Loan	Percent HAL
Clayton Bank and Trust	0	42	100.0%
21st Mortgage	1	208	99.5%
Vanderbilt Mortgage	7	109	94.0%
U.S. Bank, N.A.	10	19	65.5%
Hope Federal Credit Union	15	23	60.5%

Table E.15
Predatory Loans by Race
 Non-Entitlement Area of Mississippi
 2012 HMDA Data

Lender	Race	Regular Loan	HAL Loan	Percent HAL
Clayton Bank and Trust	Black	0	42	100.0%
	White	107	84	44.0%
21st Mortgage	Black	1	208	99.5%
	White	993	336	25.3%
Vanderbilt Mortgage	Black	7	109	94.0%
	White	909	153	14.4%
U.S. Bank, N.A.	Black	10	19	65.5%
	White	335	117	25.9%
Hope Federal Credit Union	Black	15	23	60.5%
	White	8	14	63.6%

Table E.16
Predatory Loans by Race and Property Type
 Non-Entitlement Area of Mississippi
 Select Lenders - 2012 HMDA Data

Lender	Property Type	Race	Regular Loan	HAL Loan	HAL Loan
Clayton Bank and Trust	Single Family Home	Black	0	0	.
		White	0	0	.
	Mobile Home	Black	0	42	100.0%
		White	107	84	44.0%
21st Mortgage	Single Family Home	Black	0	0	.
		White	0	0	.
	Mobile Home	Black	1	208	99.5%
		White	993	336	25.3%
Vanderbilt Mortgage	Single Family Home	Black	0	0	.
		White	5	0	0.0%
	Mobile Home	Black	7	109	94.0%
		White	904	153	14.5%

2004 – 2012 LOANS TO BLACK APPLICANTS BY LENDER

Table E.17
Loans to Black Applicants by Action by Lender
 Non-Entitlement Area of Mississippi
 Select Lenders: 2004 - 2012 HMDA Data

Lender	Action	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
First Federal	Originated						5	17			22
	Denied						69	185			254
	Denial Rate	93.2%	91.6%	.	.	92.0%
Origen Financial	Originated	20	30	14	20	2					86
	Denied	267	173	105	160	39					744
	Denial Rate	93.0%	85.2%	88.2%	88.9%	95.1%	89.6%
Vanderbilt Mortgage	Originated	69	102	108	173			66	117	116	751
	Denied	261	519	679	384			495	877	1,293	4,508
	Denial Rate	79.1%	83.6%	86.3%	68.9%	.	.	88.2%	88.2%	91.8%	85.7%
21st Mortgage	Originated	158	7	32	35	36	12	131	138	209	758
	Denied	774	127	95	123	125	30	661	619	804	3,358
	Denial Rate	83.0%	94.8%	74.8%	77.8%	77.6%	71.4%	83.5%	81.8%	79.4%	81.6%
Keesler Federal Credit Union	Originated	7	5	11	2	5	4	10	2	5	51
	Denied	8	3	25	1	27	17	40	39	53	213
	Denial Rate	53.3%	37.5%	69.4%	33.3%	84.4%	81.0%	80.0%	95.1%	91.4%	80.7%
US Bank, N.A.	Originated	13	26	34	51	49	46	69	36	29	353
	Denied	27	49	47	89	99	98	124	112	81	726
	Denial Rate	67.5%	65.3%	58.0%	63.6%	66.9%	68.1%	64.2%	75.7%	73.6%	67.3%
WMC Mortgage Company	Originated	75	365	420							860
	Denied	95	300	583							978
	Denial Rate	55.9%	45.1%	58.1%	53.2%
Bancorpsouth Bank	Originated	164	114	102	105	125	151	138			899
	Denied	205	162	172	73	70	58	43			783
	Denial Rate	55.6%	58.7%	62.8%	41.0%	35.9%	27.8%	23.8%	.	.	46.6%

Table E.18
Loans to Black Applicants by Predatory Status and Lender

Non-Entitlement Area of Mississippi
 2004 - 2012 HMDA Data

Lender	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
21st Mortgage	Regular Loan	8	1	1	1	1		1	1	1	15
	High APR Loan	150	6	31	34	35	12	130	137	208	743
	Predatory Rate	94.9%	85.7%	96.9%	97.1%	97.2%	100.0%	99.2%	99.3%	99.5%	98.0%
WMC Mortgage Company	Regular Loan	6	9	9							24
	High APR Loan	69	356	411							836
	Predatory Rate	92.0%	97.5%	97.9%	97.2%
Vanderbilt Mortgage	Regular Loan								1	7	8
	High APR Loan								116	109	225
	Predatory Rate								99.1%	94.0%	96.6%
Decision One Mortgage	Regular Loan		18	7	0						25
	High APR Loan		213	301	36						550
	Predatory Rate	.	92.2%	97.7%	100.0%	95.7%
Bank of Holly Springs	Regular Loan	0	0	1	0	1	1	2	1	3	9
	High APR Loan	11	15	16	19	25	25	26	11	18	166
	Predatory Rate	100.0%	100.0%	94.1%	100.0%	96.2%	96.2%	92.9%	91.7%	85.7%	94.9%
Clayton Bank and Trust	Regular Loan				7	3	1	0	0	0	11
	High APR Loan				0	54	44	34	15	42	189
	Predatory Rate				.	94.7%	97.8%	100.0%	100.0%	100.0%	94.5%
Equifirst Corporation	Regular Loan	4	6	7	2	1					20
	High APR Loan	29	118	126	37	6					316
	Predatory Rate	87.9%	95.2%	94.7%	94.9%	85.7%	94.0%
Novastar Mortgage	Regular Loan	3	12	2	0						17
	High APR Loan	43	64	83	7						197
	Predatory Rate	93.5%	84.2%	97.6%	100.0%	92.1%
Agent Mortgage	Regular Loan	37	0	1							38
	High APR Loan	140	111	65							316
	Predatory Rate	79.1%	100.0%	98.5%	89.3%
Southstar Funding	Regular Loan	24	20	4							48
	High APR Loan	87	161	93							341
	Predatory Rate	78.4%	89.0%	95.9%	87.7%
US Bank, NA	Regular Loan	2	4	5	11	1	1	8	16	10	58

	High APR Loan	11	22	29	40	48	45	61	20	19	295
	Predatory Rate	84.6%	84.6%	85.3%	78.4%	98.0%	97.8%	88.4%	55.6%	65.5%	83.6%
National City Bank	Regular Loan	1		37	9	2					49
	High APR Loan	0		186	1	0					187
	Predatory Rate	.	.	83.4%	10.0%	79.2%
Community Bank	Regular Loan		4	4	2	4	9	14	11	16	64
	High APR Loan	16	14	21	13	28	18	3	8	7	128
	Predatory Rate	100.0%	77.8%	84.0%	86.7%	87.5%	66.7%	17.6%	42.1%	30.4%	66.7%

F. ADDITIONAL PUBLIC COMMENTS

The following pages include letters to the Mississippi Development Authority (MDA) from public housing agencies and non-profit fair housing advocates. The MDA sought feedback from these stakeholders during the public input stage of the AI process.

THE HOUSING AUTHORITY

CITY OF HOLLY SPRINGS

700 Hwy 4 East - Post Office Box 550
Holly Springs, Mississippi 38635
Ph: (662) 252-2971

October 1, 2014

Ray Robinson, Jr.
Manager, Compliance Bureau
Mississippi Development Authority
P.O. Box 849
Jackson, MS 39205

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OCT - 1 2014

MDA
COMMUNITY SERVICES DIV.

Re: MDA 2014 Analysis of Impediments to Fair Housing

Dear Mr. Robinson:

The Holly Springs Housing Authority concurs with the identified private and public impediments as identified in MDA 2014 Analysis of Impediments Study.

1. Quality housing for the elderly as well as the handicap as an impediment in Holly Springs.
2. Quality housing for low income persons other than public housing as an impediment.

Regards,



Alfred Moore
Executive Director

THE HOUSING AUTHORITY OF THE CITY OF WEST POINT



805 IVY LANE • P.O. BOX 158
WEST POINT, MISSISSIPPI 39773
OFFICE: 662-495-2004
MAINTENANCE: 662-495-2006
FAX: 662-495-2005
TDD/TYY: 662-495-2005
EMAIL: westpointhousing@bellsouth.net

September 30, 2014

Mr. Ray Robinson, Jr.
Manager, Compliance Bureau
Mississippi Development Authority
Community Services Division
P. O. Box 849
Jackson, MS 39205

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MDA
COMMUNITY SERVICES DIV.

RE: 2014 Analysis of Impediments to Fair Housing Choice

Dear Mr. Robinson:

It was a pleasure meeting you and Ms. Fredna Perkins at the Mississippi Association of Housing and Redevelopment Officials (MAHRO) Executive Board Meeting on May 12, 2014. As Secretary-Treasurer of MAHRO along with MAHRO Director, Bob Farrar, we appreciated the opportunity to discuss the Mississippi Development Authority's (MDA) plan to include public housing agencies in the state's Analysis of Impediments. This plan conducted a study throughout the State to receive input as to what the public views as impediments to Fair Housing and what actions are needed. This was accomplished by conducting four (4) 90 minute monthly forums, a statewide survey, and four (4) public forums in June thru July. Through this process MDA formed two (2) fair housing focus group committees. The PHA Fair Housing Outreach Committee was one of these groups. We also had the privilege of attending the MAHRO Annual Conference in August in which you presented the Draft 2014 Analysis of Impediments for Fair Housing Choice.

We would like to express our appreciation to MDA for reaching out to MAHRO and its membership concerning the Analysis of Impediments to Fair Housing Choice.

The West Point Housing Authority would like to include the following additional impediments:

1. Inability to follow ADA, UFAS Guidelines

The West Point Housing Authority consists of 190 units Public Housing units ranging in size from 0 – 5 bedroom size located in 6 sites throughout the City of West Point. Over one-half of our housing stock is 63 years old with the newest being 38 years old. In 1992 we were required to meet the 504 handicap accessibility requirements. At that time anything constructed prior to 1976 was exempt from these requirements. Now ADA and UFAS requirements have come into existence and Fair Housing is enforcing Housing Authorities to comply with these regulations. To meet the requirements, our authority would have to completely remodel the interior which would be cost prohibitive. With insufficient funds to make our units accessible and UFAS compliant, it is impossible for us to meet these requirements. We feel that any units built prior to 1976 should still be exempt or HUD should provide the funding needed in order for us to be in compliance.

2. Accessibility to HOME and other housing improvement funds provide through the State

Due to requirements set by the State today, Housing Authorities are not able to obtain HOME funds and other housing improvement funds that are offered through the State. We would like for the State to assist Housing Authorities by providing more accessibility to HOME funds, set aside tax credit allocations as well as other housing improvement funds. This would help in our effort to provide choices of housing to the families that we serve in our community. According to the Market Study that was conducted in 2013, it was determined that the City of West Point is in need of additional affordable housing.

After reviewing and discussing the proposed MDA's 2014 Analysis of Impediments to Fair Housing Choice with our housing authority staff, we concur with the identified Private and Public Impediments as outlined.

Sincerely,



Kaye Judson
Executive Director
West Point Housing Authority



Bob Farrar
Director of Operations
West Point Housing Authority

*The Housing Authority
of the City of Booneville*

Miss. -65 1 College View Apts.
Miss. -65-2 Sunflower Apts.
Miss. -65-3 August Circle

Post Office Box 368
Booneville, Mississippi 38829
(662) 728-4032
Fax (662) 728-3000

Miss. -65-4 Sunflower Annex.
Miss. -65-5 East Circle Apts.

September 29, 2014

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MDA
COMMUNITY SERVICES DIV.

Mr. Ray Robinson, Jr.
Manager, Compliance Bureau
Mississippi Development Authority
P. O. Box 849
Jackson, MS 39205

Dear Mr. Robinson, Jr.

The Booneville Housing Authority has read the Analysis of Impediments conducted by the Mississippi Development Authority and agrees with the findings of the Analysis of Impediments. This authority would like the opportunity to share any local conditions for considerations as they may arise.

Sincerely,



Rita R. McKissick
Executive Director





Tennessee Valley Regional Housing Authority

P.O. Box 1329, Corinth, Mississippi 38835-1329, A.C. 662-286-8437, Fax 662-287-1996
mail@tvrha.com

TTY/TDD Customers Dial - 711 or 1-800-855-1000 (Voice) 1-800-582-2233 TTY/TDD

September 29, 2014

**Mr. Ray Robinson, Jr.
Manager, Compliance Bureau
Mississippi Development Authority
P.O. Box 849
Jackson, MS 39205**

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MDA
COMMUNITY SERVICES DIV.

Dear Mr. Robinson:

The Tennessee Valley Regional Housing Authority concurs with the Private and Public Impediments as identified in MDA's 2014 Analysis of Impediments Study.

The Tupelo hearing was attended by staff members of the Tennessee Valley Regional Housing Authority and a few comments were tendered by these attendees.

We appreciate your efforts in creating this document.

A handwritten signature in cursive script that reads "Thomas".

**Thomas M Coleman
Executive Director
Tennessee Valley Regional Housing Authority**

**The Housing Authority of the City of Winona, MS
P.O. Box 127
Winona, Mississippi 38967**

BOARD OF COMMISSIONERS

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EXECUTIVE DIRECTOR

MRS. MAGGIE W. FORREST
200 BRISCOE STREET
PHONE 662-283-2575
FAX 662-283-2576
E-Mail whousing@duckwood.net

September 29, 2014

Dear Mr. Robinson,

Winona Housing Authority agrees with the findings of the Analysis of Impediments conducted by the Mississippi Development Authority and I would like the opportunity to share any local conditions for consideration as they may arise.

Sincerely,



Maggie W. Forrest
Executive Director

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OCT - 1 2014

MDA
COMMUNITY SERVICES DIV.

**THE HOUSING AUTHORITY
OF THE CITY OF HATTIESBURG**

POST OFFICE BOX 832
HATTIESBURG, MISSISSIPPI 39403-0832
(601) 583-1881

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SEP 30 2014

MDA
COMMUNITY SERVICES DIV.

September 30, 2014

Mississippi Development Authority
Post Office Box 849
Jackson, Mississippi 39205

REF: Concurrence with State of MS MDA 2014 draft Analysis of Impediments to Fair Housing Choice

Dear Mr. Robinson:

Please be advised, the Hattiesburg Housing Authority has completed the review of the 2014 draft Analysis of Impediments to Fair Housing Choice (AI) and hereby offer our concurrence with the identified Private and Public Impediments as identified.

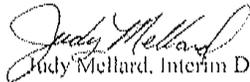
The Hattiesburg Housing Authority owns/manages 296 low income housing units divided among three sites in Forrest County, Hattiesburg, MS. In realizing the true importance of addressing Impediments, our agency participated and provided well thought participation in the statewide survey. Furthermore, we provided input into our State Association's (MAHRO) expressions of factors that are Impediments to Furthering Fair Housing as delineated in President Lucious Cameron March 27, 2014 letter to you. We concluded, lack of funding and outdated housing stock remains the major factors in ensuring compliance.

I attended the MDA meeting regarding the Impediments to Fair Housing held in Hattiesburg and also completed the survey MDA sent to our agency. During the months of October and November, we will conduct a series of meetings with our residents focusing on Fair Housing and will utilize partners such as Aids Service, Inc., Christian Services and our local banks to further educate our residents on matters related to Fair Housing. Based on the reactions and interest, further educational meetings will be established.

In conclusion, we concur with the 2014 draft Analysis of Impediments and will work collectively towards overcoming barriers faced by our low income residents and our community at large.

You may contact me at 601.583.1881 should you have questions or need additional assurances.

Thank you,


Judy Mellard, Interim Director



P.O. Box 419
 298 Northside Drive
 Newton, MS 39345

CENTRAL OFFICE

Phone: (601) 683-3371
 Fax: (601) 683-0478

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MDA
 COMMUNITY SERVICES DIV.

September 29, 2014

To the Mississippi Development Authority,

I have reviewed the State of Mississippi's Analysis of Impediments to Fair Housing Choice and I am in agreement with their findings.

Due to insufficient funding to make Public Housing renovations for accessibility and UFAS compliant units, Housing Authorities are finding it almost impossible to keep its goals of Affirmatively Furthering Fair Housing. The inability to make these renovations is limiting the housing choices of the disabled and mobility impaired families in the communities we serve. We, as Housing Authorities, serve a segment of the community (30% or less of the median income) many of whom are trying to move up the economic ladder, but are finding their choices of housing limited and aging. This also acts as barriers, which we are finding are unintentionally segregating low income families to certain communities.

Once again, I do concur with the identified Private and Public Impediments as identified in MDA's 2014 Analysis of Impediments Study. Please include Mississippi Regional Housing Authority No. V in your plan.

Sincerely,

Sonda G. Davis
 Executive Director

CLARKE • JASPER • KEMPER • LAUDERDALE • LEAKE • NESHOPA • NEWTON • NOXUBEE • SCOTT • SMITH



LAWYERS' COMMITTEE FOR
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 www.lawyerscommittee.org

September 29, 2014

Ray Robinson, Bureau Manager
 Community Services Division, Compliance Bureau
 Mississippi Development Authority
 P.O. Box 849
 Jackson, MS 39205

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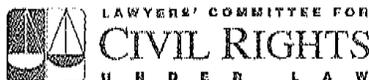
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General Counsel
 Nicholas T. Christakos
President & Executive Director
 Barbara R. Aronine

Dear Mr. Robinson:

Thank you for the opportunity to submit comments on the draft *2014 State of Mississippi Analysis of Impediments to Fair Housing Choice* (AI). The Lawyers' Committee for Civil Rights Under Law is a national non-profit civil rights organization that was founded at the request of President Kennedy in 1963 to marshal the resources of the private bar to secure equal justice for all through the rule of law. The Lawyers' Committee has a long track record of working to protect the civil and human rights of African Americans in Mississippi and had an office in Jackson from 1965 through 1984. Since 2005, the Lawyers' Committee's Fair Housing & Community Development Project has worked tirelessly to ensure an equitable recovery from the devastation wrought by Hurricane Katrina for African American residents of the Mississippi Gulf Coast. The Lawyers' Committee's is currently engaged on housing and community development issues in Mississippi through its representation of the North Gulfport Community Land Trust and the STEPs Coalition. Ensuring compliance with the duty to affirmatively further fair housing -- a process for which the AI is of vital importance -- is one of the Lawyers' Committee's top organizational priorities. It is with this commitment to Mississippi and substantive expertise in civil rights law, in general, and fair housing law, in particular, that the Lawyers' Committee respectfully submits the following comments on the Mississippi Development Authority's draft AI.

1. Criteria for Assessing Analyses of Impediments.

In developing the recommendations for improving the draft included in this letter, we drew from several authoritative sources on the meaning of the duty to affirmatively further fair housing and appropriate content for an AI. The U.S. Department of Housing & Urban Development's (HUD) *Fair Housing Planning Guide*, the summary judgment decision in *U.S. ex rel. Anti-Discrimination Center of Metro New York, Inc. v. Westchester County*, HUD's Proposed Rule on Affirmatively Furthering Fair Housing all informed these comments. In light of the *Westchester* decision, which held that the *Fair Housing Planning Guide* was persuasive authority for the purpose of determining what it means to conduct an AI, an AI should generally follow the template provided in the guide but must also reflect the lessons emphasized in the *Westchester* decision about the importance of protected class status and



recognize that better data is more broadly available today than at the time of the guide's publication.

2. *The Draft AI's discussion of demographic data is incomplete.*

There are several significant flaws with the discussion of demographic data of the draft AI that must be corrected in the final version of the document. In an effective AI, a thorough and germane discussion and analysis of demographic data provides an objective basis for conclusions about which impediments to fair housing are most pressing and what corrective actions would address those impediments.¹ The *Fair Housing Planning Guide* recommends the inclusion of demographic, income, employment, and housing data in AIs. It specifically notes that housing data should describe the degree of segregation in the jurisdiction. By addressing defects, the state can build a better foundation for the other sections of the report.

First, while there is no direction from HUD in the *Fair Housing Planning Guide* about how to measure segregation, we believe that the draft utilizes an inappropriate measure for determining where disproportionate shares of people of color and persons with disabilities reside. The draft includes maps of the state with Census Tract boundary overlays and color-codes Census Tracts by the extent to which the concentration of a given group in each tract exceeds (or falls below) the statewide concentration of that group. Census Tracts in which the group population concentration is 10% more than statewide are deemed to have disproportionate shares of that group. For example, the concentration of African Americans in non-entitlement areas across the state is 34.1%. Under this methodology, Census Tracts that are 44.2% or more African American have a disproportionate share of African American residents. Since housing markets function along regional lines, the use of this framework leads to results which do not accurately the level of residential segregation when employed at the statewide level. For example, Census Tract 8 in Greenville, Mississippi is 51.5% African American while the City of Greenville is 75.6% African American. Census Tract 706.10 in Southaven is 38.2% African American while the City of Southaven is 21.7% African American. It is clear that Census Tract 8 is far more integrated than Census Tract 706.10, yet the former has a disproportionate share of African Americans under this methodology while the latter does not.

Second and relatedly, the draft does not include the statistical indices for measuring residential segregation that are most commonly used by social scientists. Although HUD's Proposed Rule on Affirmatively Furthering Fair Housing is not yet final, the data documentation for the Proposed Rule provides the best indication of what data jurisdictions should use to measure segregation. It references the dissimilarity index which reflects the percentage of households of a given race within a given city or metropolitan area that would have to move in order to be integrated with respect to another race.² If a city has an African American-white dissimilarity index of 0.75, 75% of African Americans would have to move in order for the

¹ U.S. DEPARTMENT OF HOUSING & URBAN DEVELOPMENT, FAIR HOUSING PLANNING GUIDE 2-27 (1995), available at <http://www.hud.gov/offices/fhco/images/fhpg.pdf>.

² Affirmatively Furthering Fair Housing, 78 Fed. Reg. 43710 (Proposed July 19, 2013); U.S. DEPARTMENT OF HOUSING & URBAN DEVELOPMENT, AFFH DATA DOCUMENTATION 2 (June 2013).

The Lawyers' Committee was formed at the request of President John F. Kennedy in 1963.



percentage of African Americans to be constant across all Census Tracts. The isolation index measures the average Census Tract-level population concentration of a given race experienced by households of that race in a given city or metropolitan area.³ If there is an African American isolation index of 0.67, the average African American household resides in a Census Tract that is 67% African American. Since one of the primary components of an effective AI is an analysis of residential racial segregation, these two indices should be included in the report to serve as a starting point for that analysis.

Third, the draft includes several data points relating to economic and housing conditions but fails to connect those statistics to any protected class status thus limiting their value in a report concerned with fair housing choice. The *Fair Housing Planning Guide* clearly indicates that the purpose of including data is to assess conditions for members of protected classes.⁴ Additionally, the summary judgment decision in *Westchester* explicitly criticized the county for focusing on income without drawing the connections between income and race that are necessary to make such data relevant to fair housing.⁵ Additionally, many of these data points – including household income and housing tenure – are readily available by race, national origin, sex, and, in some instances, other protected classes. It is particularly important to include data points like tenure by race because such information provides a basis for concluding whether common exclusionary policies, such as those that limit the availability of rental housing, have a disparate impact in violation of the Fair Housing Act. Identifying such policies is the very essence of Mississippi's obligation under the duty to affirmatively further fair housing.

Fourth and finally, the draft's discussion of data concerning persons with disabilities in Mississippi could be dramatically improved. The draft erroneously states that Census Tract-level counts of the population of persons with disabilities are unavailable. Prior to the release of the 2008-2012 American Community Survey (ACS) 5-Year Estimates, there was a several year period during which such data was not available because of a change in the ACS's methodology for asking about disability between 2007 and 2008. However, over five years have elapsed since that change and there is no reason why the AI cannot be updated to reflect Census Tract-level demographics. Additionally, because of the methodological change, the draft claims that it is impossible to compare disability statistics from the 2000 Census to current ones. While it is true that a direct comparison of the statistics would not be informative, a simple work-around is available. The AI can report whether there has been any change in how many standard deviations the concentration of persons with disabilities in Mississippi is from the national average.

3. *The discussion of policies relating to zoning, the siting of subsidized housing, and affordable housing production is inadequate.*

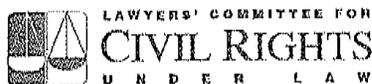
At multiple points in the process of drafting the AI, stakeholders informed the MDA's consultant that exclusionary zoning is an impediment to fair housing choice in Mississippi. The

³ *Id.* at 2-3.

⁴ U.S. DEPARTMENT OF HOUSING & URBAN DEVELOPMENT, *supra* note 1, at 2-27.

⁵ U.S. *ex rel.* Anti-Discrimination Center of Metro New York, Inc. v. Westchester County, 668 F. Supp. 2d. 548, 562 (S.D.N.Y. 2009).

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Fair Housing Planning Guide states that state AIs should include a “[r]eview of local planning/zoning and land use controls for evidence of restrictions that impede fair housing choice” in state-funded jurisdictions.⁶ Accordingly, the stakeholders identified multiple communities – including Madison, Pearl, and Ridgeland – where exclusionary zoning is particularly pernicious. All of these communities are non-entitlement jurisdictions that are within the purview of the AI. Yet, despite being informed of possible systemic violations of the Fair Housing Act, the draft did not discuss these zoning ordinances or propose that the state use its leverage and influence to attempt to get these communities to revise their zoning ordinances to facilitate the development of affordable housing in areas where such housing would promote residential integration. That is the type of discussion and analysis that is expected in an AI, and it is missing from the draft.

The planning guide directs states to review “[s]tatewide policies that restrict the provision of housing and community development resources to areas of minority concentration.”⁷ The draft’s discussion of the location of subsidized housing is flawed. The draft includes maps depicting the locations of Housing Choice Vouchers and public housing units across the state, but the scale of that map makes it difficult to tell whether subsidized housing is disproportionately located in areas of African American population concentration, especially in places where Census Tracts are compact and boundaries close together. The maps should be supplemented with additional maps that show the location of subsidized housing with greater granularity and tables that list the Census Tracts in which subsidized housing is located and the demographics of those Census Tracts. Additionally, though the draft appropriately recognizes that Low Income Housing Tax Credit (LIHTC) developments are concentrated in communities of color, it does not include any discussion of the causes of that impediment to fair housing choice, including how the Mississippi Home Corporation is administering the program. Throughout, the type of discussion envisioned in the planning guide to address specific programs and the policies governing them is missing.

During the community engagement process, stakeholders also pointed out that the lack of dedicated state resources for affordable housing needs was an impediment to fair housing choice. Specifically, advocates recommended the creation of an affordable housing trust fund. Although, as with LIHTC, the mere creation of affordable housing does not further fair housing in and of itself, a trust fund could be a powerful tool for promoting fair housing if operated consistent with fair housing principles. Additionally, because a proposed trust fund would create units affordable for households at 30% of Area Median Income, the program could be a powerful tool for promoting community integration for persons with disabilities. In its Proposed Rule, HUD strongly stated that promoting community integration for persons with disabilities is an important way of furthering fair housing choice for persons with disabilities.⁸

4. *The draft fails to identify the most significant impediments to fair housing choice and proposes insufficient corrective actions for the impediments that it does identify.*

⁶ U.S. DEPARTMENT OF HOUSING & URBAN DEVELOPMENT, *supra* note 1, at 3-10.

⁷ *Id.* at 3-8.

⁸ Affirmatively Furthering Fair Housing, 78 Fed. Reg. 43710, 43714 (proposed July 19, 2013).

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The draft AI omits three major impediments to fair housing choice that should have been included. First, as noted above, the document's discussion of exclusionary zoning is inadequate, and, relatedly, exclusionary zoning is not listed as an impediment to fair housing choice. This omission is glaring in light of the volume of stakeholder feedback that the consultant received on this point. Second, despite a high volume of stakeholder feedback highlighting the need for greater access to public transportation, the draft does not include that problem as an impediment. The *Fair Housing Planning Guide* explicitly recognizes that public transit is critical to ensuring that housing in high opportunity areas is linked to employment centers and other critical community assets for low-income families and directs states to consider how their transportation policies affect protected classes, especially persons with disabilities.⁹ Third, although the draft notes that Mississippi lacks a fair housing law and is unable to access federal funds through the Fair Housing Assistance Program (FHAP) as a result, the absence of a fair housing law is not listed as an impediment. The passage of such a law and the creation of a FHAP agency would dramatically enhance the ability of victims of housing discrimination to secure redress in Mississippi.

For those impediments that are included in the draft, the proposed corrective actions are insufficient. Although there is a role for education and outreach activities in furthering fair housing, education and outreach are unlikely to be the most effective tools for eliminating most impediments. Instead, meaningful enforcement and policy changes are necessary. For example, the state should commit to using its leverage as a grantor of housing and community development funds to incentivize jurisdictions to remediate exclusionary zoning ordinances and to implement new, inclusionary policies. Additionally, to the extent that state policies, such as those relating to the Mississippi Home Corporation's administration of the LIHTC program, are perpetuating residential racial segregation, the AI should directly propose changes to those policies. With one notable exception relating to the Housing Choice Voucher program, the draft does nothing of the sort.

There are a few additional structural flaws to the draft's proposed corrective actions that bear mention. First, many of the actions are listed multiple times because they have the potential to address multiple impediments. While there is nothing wrong with taking steps that would solve multiple problems, the AI should be clear about the number of total actions it is proposing. Otherwise, the AI would create a mistaken impression that the state is doing more than it really is. Second, many of the proposed benchmarks do not promote true accountability. The draft seems to have taken the recommendation to include measurable outcomes to mean that the actions should include components that are quantifiable, not to mean that the AI should include actual numerical goals for those components or numerical goals for changes in underlying conditions. The *Fair Housing Planning Guide* bolsters this point by stating that corrective actions should include defined objectives with measurable results.¹⁰ In general, it is appropriate to set specific numerical goals as interim benchmarks and numerical goals for changes in underlying conditions as long-term benchmarks. Third, the draft defers some steps that should

⁹ U.S. DEPARTMENT OF HOUSING & URBAN DEVELOPMENT, *supra* note 1, at 3-8.

¹⁰ *Id.* at 2-23.

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have been taken as part of the AI to the implementation process. Actually implementing a testing program by contracting with a non-profit legal services or fair housing organization should be a proposed corrective action, not performing certain preliminary steps toward that end.

5. The draft was developed without adequate public participation and does not reflect important comments by stakeholders who participated in the process.

The MDA dramatically improved upon its track record from its 2008 AI and its 2012 update to the 2008 AI in reaching out to stakeholders during the development of the draft AI. The agency held more public hearings in a more diverse array of locations, sought intergovernmental feedback, made this draft available for comment, and proactively reached out to the Mississippi Center for Justice, a key stakeholder. Even with all that in mind, the analysis in the draft does not reflect the comments that the MDA received during the public participation process. In addition to the glaring omission of exclusionary zoning, the lack of a state fair housing law and FHAP agency, and the lack of a housing trust fund from the list of impediments, the consultant used a flawed survey instrument to solicit input, and the draft does not reflect outreach to other important stakeholders, including but not limited to civil rights organizations, disability advocacy organizations, housing advocacy organizations, disability services providers, and affordable housing developers.¹¹ Before finalizing the AI, the MDA must reach out to such groups in order to ensure that the document reflects the experiences of members of protected classes in Mississippi.

Thank you for your considering these comments. Compliance with the duty to affirmatively further fair housing is a critical civil rights issue and a high priority for the Lawyers' Committee. Although the draft AI has serious flaws that undermine its validity, MDA now has the opportunity to address those mistakes and further fair housing. We urge you to address the issues and implement the recommendations identified in this letter. If you have any questions about implementation strategies, please do not hesitate to contact Thomas Silverstein by phone at (202) 662-8600 or by e-mail at tsilverstein@lawyerscommittee.org.

Sincerely,

Joseph D. Rich
Co-Director, Fair Housing & Community Development Project

Thomas Silverstein
Associate Counsel, Fair Housing & Community Development Project

¹¹ *Id.* at 2-13. The *Fair Housing Planning Guide* recommends engagement with these and other types of stakeholder organizations.

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THE UNIVERSITY OF
SOUTHERN MISSISSIPPI

INSTITUTE FOR DISABILITY STUDIES
 Mississippi's University Center for Excellence in Disabilities
 118 College Drive #5163 | Hattiesburg, MS 39406-0001
 Phone: 601.266.5163 | (TTY) 888.671.0051 | www.usm.edu/ids

September 29, 2014

Mississippi Development Authority (MDA)
 Attn: Ray Robinson
 Post Office Box 849
 Jackson, Mississippi 39205

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 SEP 29 2014

MDA
 COMMUNITY SERVICES DIV.

RE: MDA Analysis of Impediments (AI) comments

Mr. Robinson:

I have reviewed the AI draft and just wanted to comment on the following. Federal funds for Fair Housing activities in our state are sporadic, unpredictable and often times targeted to only certain locations of the state. The University of Southern Mississippi Institute for Disability Studies (IDS) has received funding from federal sources and MDA's Disaster Recovery Division. The outreach and training provided have definitely been beneficial. However, if MDA's Community Services Division could pursue being able to provide a continuous funding stream to supplement the federal funding, that may or may not be awarded our state, it would certainly affirmatively further fair housing and would be a great benefit to the state. Consistent funding would allow more areas of the state to have the opportunity to have fair housing outreach for residents. Consistent funding will allow organizations to be able to retain staff to provide the continuous outreach. And consistent funding will allow Mississippi residents to have program recognition and reliable contact information.

Currently, as the federal dollars come and go into our state, programs gain momentum and public awareness, but when funding lapses, momentum ceases. HUD is serious about fighting housing discrimination, and Mississippi should be as well. With proper guidance, education and monitoring, public and private entities, service providers and individuals will become more aware of the Fair Housing Laws and how to comply. People are often confused as to who to contact regarding fair housing in their local communities. Service providers often don't know who or how to contact agencies for support and technical assistance on fair housing issues.

If MDA's Community Services Division is able to take the lead in funding fair housing activities on a consistent basis in our state then the fair housing education, testing and monitoring needed would always be in place in Mississippi.

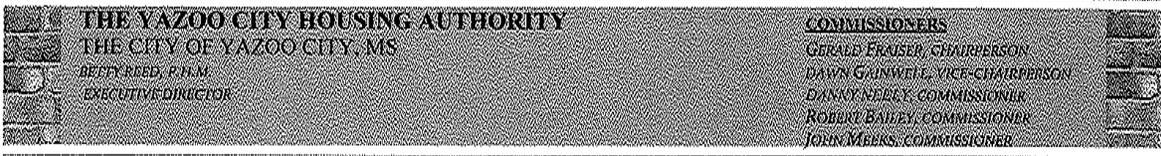
In regards to people with disabilities and fair housing, if additional consistent funding is provided, it will allow additional workshops to be held across our state and therefore provide better fair housing awareness to people with disabilities, as well as the elderly population. The issue with getting information in the Delta and other poverty areas of our state is transportation. People don't have access to transportation to attend meetings that are not held in their local communities; access is also an issue for people with disabilities. The information must be delivered at the local grassroots level and in a format that people are able to hear it, understand it and know how to report it as a fair housing issue.

So, heightened program awareness, additional funding and inclusive fair housing information delivery continue to be the fair housing impediments and barriers to address in Mississippi.

Sincerely,

Cassie Hicks

Cassie Hicks
Coordinator for Housing



October 2, 2014

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OCT - 6 2014

Ray Robinson, Jr
Manager, Compliance Bureau
Mississippi Development Authority
Post Office Box 849
Jackson, Mississippi 39205

MDA
COMMUNITY SERVICES DIV.

Dear Mr. Robinson

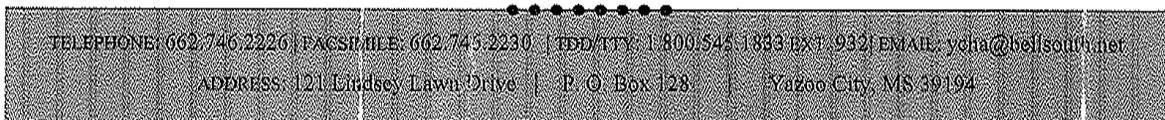
The Yazoo City Housing Authority does concur with the Private and Public Impediments as identified in MDA's 2014 Analysis of Impediments Study.

The Private and Public actions recommended is also acceptable actions the Yazoo City Housing Authority concurs that can be taken to address each action for each impediment.

The Yazoo City Housing Authority does not have any additional impediments and or suggested actions to include.

Sincerely,

Betty Reed, P.H.M.
Executive Director





TUPELO HOUSING AUTHORITY

P.O. BOX 3 • 701 SOUTH CANAL STREET
TUPELO, MISSISSIPPI 38802-0003
(662) 842-5122 • FAX (662) 680-9730
www.tupha.org

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EXECUTIVE DIRECTOR
JANICE STEWART WILLIAMS

October 2, 2014

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OCT - 6 2014

MDA
COMMUNITY SERVICES DIV.

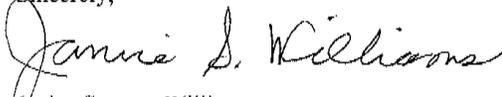
Mr. Ray Robinson, Jr.
Manager, Compliance Bureau
Mississippi Development Authority
P.O. Box 849
Jackson, MS 39205

Dear Mr. Robinson:

The Tupelo Housing Authority has reviewed the Analysis of Impediments to Fair Housing Choice conducted by the Mississippi Development Authority. We agree with the findings of the Analysis of Impediments. This Authority would like the opportunity to share local conditions for consideration as they may arise.

We look forward to working with the MDA in promoting fair housing in our state.

Sincerely,


Janice Stewart Williams
Executive Director

JSW:ts

Together We Can Make A Difference!

THE HOUSING AUTHORITY OF THE TOWN OF BALDWIN

Kenneth R. Bishop, Executive Director

P.O. Box 307

Baldwin, Mississippi 38824-0307

Phone (662) 365-2335

Fax (662) 365-7669

E-Mail byn@avsia.com

Board of Commissioners:
Robert McCoy, Chairman

Sammy Bolton
Cleavon Smith
Jack Hamblin, Jr.

Ray Robinson, Jr
Manager, Compliance Bureau
Mississippi Development Authority
Post Office Box 849
Jackson, Mississippi 39205



RE: Public Impediments

Mississippi Development Authority,

Thanks to the Mississippi Development Authority for the opportunity to comment on factors that are Impediments to Furthering Fair Housing encountered by the Housing Authority's within the State of Mississippi.

HUD states that impediments are barriers that affect the rights of fair housing choice. These impediments are defined as any action, 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.

We, as a Public Housing Authority, concur with the Public Impediments 1 - 5 as identified in MDA's 2014 Analysis of Impediments Study.

However, housing authority's across the State are battling a continuing decline in the funding required to maintain existing public housing much less construct new dwelling's to meet current needs as identified by the waiting list at housing authority's in Mississippi.

With this in mind, we consider the number one Public Impediment to be a lack of available funding.

Regards,

A handwritten signature in cursive script that reads "Kenneth R. Bishop".

Executive Director

The Housing Authority of the City of Corinth

1101 Cruise Street/P. O. Box 1003
Corinth, MS 38834
(662) 287-1489 (662) 286-6951
adm@corinthhousingauthority.org

October 1, 2014

Mississippi Development Authority
P. O. Box 849
Jackson, Ms. 39205

Attention: Ray Robinson, Jr.

Subject: Public Impediments

RECEIVED
OCT - 6 2014

MDA
COMMUNITY SERVICES DIV.

Dear Sir;

Housing and Urban Development states that impediments are barriers that affect the rights of fair housing Choices. These impediments are defined as any action, omissions or decisions that restrict or have the effect of restricting the availability of housing choices based on race, color, sex, religion, disability, familial status or national origin.

As a Public Housing Authority, I agree with the Public Impediments 1-5 as identified in MDA's 2014 Analysis of Impediments Study. Nevertheless, Mississippi housing authorities are fighting a continuing decline in the funding required to maintain our housing units much less add new construction to meet the Housing needs in our Cities and State.

I feel the lack of available funding to be the main problem Public Housing and Section 8 are facing considering the needs of housing each City in the State is facing.

Very truly yours,



Dianne Timbes
Executive Director

MISSISSIPPI REGIONAL HOUSING AUTHORITY NO. VII

130 Commerce Street - P. O. Box 748 - Phone 601-684-0561 or 9503
McComb, Mississippi 39649 FAX (601) 684-6422 or 3312

LUCIOUS CAMERON, Secretary
and Executive Director

October 3, 2014

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OCT - 3 2014

MDA
COMMUNITY SERVICES DIV.

Mr. Ray Robinson, Jr
Manager, Compliance Bureau
Mississippi Development Authority
Post Office Box 849
Jackson, Mississippi 39205

Dear Mr. Robinson, Jr.,

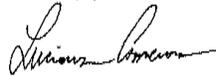
I would like to thank the Mississippi Development Authority for this opportunity to join in support of the States Analysis of Impediments (AI) to Furthering Fair Housing faced by Public Housing Authorities across the State of Mississippi.

HUD states that impediments are barriers that affect the rights of fair housing choice. These impediments are defined as any action, 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.

Due to insufficient funding to make Public Housing renovations for accessibility and UFAS compliant units, Housing Authorities are finding it almost impossible to keep its goals of Affirmatively Furthering Fair Housing. The inability to make these renovations is in a sense stifling or limiting the housing choices of the disabled and mobility impaired families in the communities we serve. Also Housing Authorities serve a segment of the community (30% or less of the median income) many of whom are trying to move up the economic ladder, but are finding their choices of housing limited and aging. This also acts as barriers, which we are finding are unintentionally segregating low income families to certain communities.

Again I want to thank the MDA and your Compliance Bureau for allowing Housing Authorities across our state to participate in the States AI and we look forward to forging a partnership with the MDA as we move forward to the goal of furthering Fair Housing in our great state of Mississippi.

Sincerely yours,



LUCIOUS CAMERON

MRHA7 is: *"Building a Stronger America, Through Housing. One Family at a Time"*

MISSISSIPPI REGIONAL HOUSING AUTHORITY NO. VI

P.O. DRAWER 8746
JACKSON, MISSISSIPPI
39284-8746

TELEPHONE (601) 373-7040

TTY (601) 714-3995

FAX (601) 373-9292

October 3, 2014

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OCT - 5 2014

MDA
COMMUNITY SERVICES DIV.

Ray Robinson, Jr.
Manager, Compliance Bureau
Mississippi Development Authority
Post Office Box 849
Jackson, MS 39205

RE: Draft 2014 Analysis of Impediments to Fair Housing Choice

Dear Mr. Robinson:

Thank you for allowing the opportunity for public comments regarding your agency's priority of Affirmatively Furthering Fair Housing. I attended one of your public hearings on March 24, 2014 held at Cabot Lodge in Jackson, MS.

As you are aware, there is insufficient funding readily available for Public Housing renovations and improvements for accessibility which challenges the housing authorities' ability to maintain its goals of affirmatively furthering fair housing. This inability to make necessary improvements has a limiting impact on the housing choices of the disabled and mobility impaired families in the communities we serve. Also, Housing Authorities serve a segment of the community with limited income and other resources which make finding their housing choices very limited. This also results in unintentional segregation of low income families to certain communities.

MRHA VI concurs with the identified Private and Public impediments as identified in MDA's 2014 Analysis of Impediments Study. We are also committed to work together with our Great State of Mississippi to positively impact our communities.

Sincerely,


Katina C. Pace
Deputy Executive Director

2180 TERRY ROAD, JACKSON, MISSISSIPPI 39204



MERIDIAN HOUSING AUTHORITY
 MERIDIAN, MISSISSIPPI 39302-0870

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 OCT - 3 2014

MDA
 COMMUNITY SERVICES DIV.

Committed to Excellence October 3, 2014

Executive Director:
 Ronald J. Turner, Sr., PHM
 601-693-4285
 Fax: 601-693-4491

Board of Commissioners:
 Wilbert Jones, *Chairman*
 Donnie Smith, *Vice Chairman*
 Jeanelle Kidd, *Commissioner*
 Sylvia Autry, *Commissioner*
 Rob Arline, *Commissioner*

MHA DEPARTMENTS:

Finance & Administration
 601-693-4285, Ext. 226

Executive Assistant & HR
 601-693-4285, Ext. 228

Asset Management
 601-693-4285, Ext. 223

Tenant Selection & HCV
 601-693-2800, Ext. 225

Modernization
 601-693-4285, Ext. 241

Vacancy Crew
 601-693-3328

Community Support Service
 601-693-2800

Dear Mr. Robinson:

On behalf of the Meridian Housing Authority's (MHA) residents and Board of Commissioners, I would like to thank the Mississippi Development Authority for the opportunity to discuss a few factors that are impediments to furthering fair housing at MHA.

The lack of available funding streams to make the conversions necessary to meet UFAS and accessibility compliance demands presents a major planning challenge at MHA. The task of achieving the goal of Affirmatively Furthering Fair Housing remains a near impossible accomplishment. MHA has a waiting list of over 400 eligible applicants. Many applicants on the waitlist are finding that their choices for housing opportunities are limited due to their economic status.

There are over 1400 units in our public housing and housing choice voucher portfolio. The average age of our housing stock is 60 years. Given these factors, we are asking the State of Mississippi to place priority on assisting MHA with overcoming affordable housing impediments.

The State's assistance is needed in providing accessibility to HOME funding and tax credit allocation set-asides for public housing agencies.

Your immediate attention to our cause is critically needed and sincerely appreciated.

Yours for affordable housing opportunities,

Ronald J. Turner, Sr.
 Executive Director

From:

10/02/2014 23:54

#328 P.002/002

The Water Valley Housing Authority
232 Blackmur Dr.
Water Valley, MS 38965
662-473-2801
FAX: 662-473-1826

10-03-2014

Mr. Ray Robinson
P.O. Box 849
Jackson, MS 39205
601-359-9273

RECEIVED
OCT - 3 2014

MDA
COMMUNITY SERVICES DIV

Dear Mr. Robinson,

The Water Valley Housing Authority would like to be included in your 2014 Mississippi AI. We would like to be considered an active participant in the program. We have no questions or comments to add to your proposal. Please include our housing authority in your presentation to HUD.

Thank you for your assistance in this matter.

Sincerely,


Ray Brasher
Executive Director

From:

10/02/2014 23:54

#328 P.001/002

The Water Valley Housing Authority
232 Blackmur Dr.
Water Valley, MS 38965
662-473-2801
Fax-1-662-473-1826

FAX to : _____

ATTN: Ray Roberson Jr.

FAX#: 601-359-3108

CONCERNING: Ms. AI

This cover sheet and 1 page(s).

Comments : Thanks for your help.



Post Office Box 908
Clarksdale, Mississippi 38814

THE HOUSING AUTHORITY OF THE CITY OF CLARKSDALE
Telephone: (662) 624-8030 • Fax: (662) 627-3341 • E-mail: ras_cha@bellsouth.net

Royal Ann Spencer
Executive Director

October 1, 2014

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OCT - 3 2014

Mississippi Development Authority
Post Office Box 849
Jackson, Mississippi 39205

MDA
COMMUNITY SERVICES DIV.

REF: Concurrence with State of MS MDA draft Analysis of Impediments to Fair Housing Choice

Dear Mr. Robinson:

Please be advised, the Clarksdale Housing Authority has completed the review of the 2014 draft Analysis of Impediments to Fair Housing Choice (AI) and hereby offer our concurrence with the identified Private and Public Impediments as identified.

The Clarksdale Housing Authority owns/manages 296 low income housing units divided among four sites in Coahoma County, Clarksdale, MS. We concur with President Cameron's March 27, 2014, letter to you that the lack of funding and outdated housing stock remains the major factors in ensuring compliance.

We will conduct meetings with our residents focusing on Fair Housing to further educate our residents on matters related to Fair Housing. I'm confident further educational meeting will be established.

In conclusion, we concur with the 2014 draft Analysis of Impediments and will work collectively towards overcoming barriers faced by our low income residents and our community at large.

You may contact me at 662-624-8030 should you have any questions or need additional information.

Thank you,

Royal Ann Spencer
Executive Director

The Housing Authority of the City of Iuka, MS
P.O. Box 267 Iuka, Mississippi 38852

October 1, 2014

BOARD OF COMMISSIONERS
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Ned Boston, VICE CHAIRMAN
Nan Lyles, COMMISSIONER
James Walker, COMMISSIONER
Nancy Brinkley, COMMISSIONER

EXECUTIVE DIRECTOR
Onita Howell
1629 Whitehouse Road
PHONE 662-423-9232
FAX 662-423-9233
E-Mail iukahn@bellsouth.net

Ray Robinson, Jr
Manager, Compliance Bureau
Mississippi Development Authority
Post Office Box 849
Jackson, Mississippi 39205

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OCT - 3 2014

MDA
COMMUNITY SERVICES DIV.

RE: Public Impediments

Mississippi Development Authority,

Thanks to the Mississippi Development Authority for the opportunity to comment on factors that are Impediments to Furthering Fair Housing encountered by the Housing Authority's within the State of Mississippi.

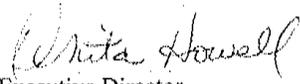
HUD states that impediments are barriers that affect the rights of fair housing choice. These impediments are defined as any action, omissions or decisions that restrict or have the effect of restricting, the availability of housing choices, based on race, color, religion, sex, disability, familial status, or national origin.

We, as a Public Housing Authority, concur with the Public Impediments 1 - 5 as identified in MDA's 2014 Analysis of Impediments Study.

However, housing authority's across the State are battling a continuing decline in the funding required to maintain existing public housing much less construct new dwelling's to meet current needs as identified by the waiting list at housing authority's in Mississippi.

With this in mind, we consider the number one Public Impediment to be a lack of available funding.

Regards,


Executive Director.

THE HOUSING AUTHORITY
OF THE
CITY OF PICAYUNE



Phone: (601) 798-3281

P.O. Drawer 40, 821 6th Avenue, Picayune, MS 39466

Fax: (601) 799-5123

October 2, 2014

Mr. Ray Robinson, Jr.
Manager, Compliance Bureau
Mississippi Development Authority
P.O. 849
Jackson, MS 39205

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OCT - 3 2014

MDA
COMMUNITY SERVICES DIV.

Dear Mr. Robinson:

I am writing on behalf of the Picayune Housing Authority to express that we agree with the Private and Public Impediments as identified in MDA's 2014 Analysis of Impediments to Fair Housing Choice Study.

We especially agree that there is insufficient understanding of Fair Housing Laws by low rent tenants and insufficient fair housing testing and enforcement in non-entitlement areas of Mississippi. We further agree with MAHRO findings that insufficient funding to make Public Housing renovations for accessibility and UFAS compliant units, Housing Authorities are finding it almost impossible to keep its goals of Affirmatively Furthering Fair Housing. The inability to make these renovations is in a sense stifling or limiting the housing choices of the disabled and mobility impaired families in the communities we serve.

Housing Authorities serve a segment of the community (30% or less of the median income) many of whom are trying to move up the economic ladder, but are finding their choices of housing limited and aging. This also acts as barriers, which we are finding are unintentionally segregating low income families to certain communities.

Thank you for providing assistance in helping PHA's remove these barriers to the provision of fair housing.

Sincerely,

Toni Watts
Executive Director

FOREST HOUSING AUTHORITY
518 FOURTH AVENUE NORTH
FOREST, MS 39074
TELEPHONE/FAX (601) 469-1342
Foresth2@bellsouth.net

Mary Johnson, Executive Director

Maxie Ruseo, Housing Manager

“ENHANCING LIVES OF RESIDENTS”

October 1, 2014

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To the Mississippi Development Authority:

MDA
COMMUNITY SERVICES DIV.

The Forest Housing Authority (FHA) has reviewed your draft of the 2014 Analysis of Impediments to Fair Housing Choice and supports your efforts to improve and enhance housing for residents that we serve. It is imperative that all work collectively to impact the need to serve this needy population. We need to see results.

The lack of affordable rental and homeownership choices, availability of funding for new development, community perceptions, and housing counseling services are institutional issues and barriers that should be addressed immediately. In the small rural community that we serve we see aged housing (40/50 years old) steady deteriorating in need of replacement or renovation due to lack of funding. Without priority being placed on funding for Furthering Fair Housing concerns it will be impossible to keep our community moving up the ladder, which leads to more self-sufficiency.

We as a Public Housing Authority seek to develop and restore more decent and safe housing in our community.

Respectfully yours'

Mary Johnson

Mary Johnson, Executive Director

Forest Housing Authority

THE HOUSING AUTHORITY OF THE CITY OF WEST POINT



805 IVY LANE • P.O. BOX 158
WEST POINT, MISSISSIPPI 39773
OFFICE: 662-495-2004
MAINTENANCE: 662-495-2006
FAX: 662-495-2005
TDD/TYY: 662-495-2005
EMAIL: westpointhousing@bellsouth.net

September 30, 2014

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OCT - 2 2014

Mr. Ray Robinson, Jr.
Manager, Compliance Bureau
Mississippi Development Authority
Community Services Division
P. O. Box 849
Jackson, MS 39205

MDA
COMMUNITY SERVICES DIV.

RE: 2014 Analysis of Impediments to Fair Housing Choice

Dear Mr. Robinson:

It was a pleasure meeting you and Ms. Fredna Perkins at the Mississippi Association of Housing and Redevelopment Officials (MAHRO) Executive Board Meeting on May 12, 2014. As Secretary-Treasurer of MAHRO along with MAHRO Director, Bob Farrar, we appreciated the opportunity to discuss the Mississippi Development Authority's (MDA) plan to include public housing agencies in the state's Analysis of Impediments. This plan conducted a study throughout the State to receive input as to what the public views as impediments to Fair Housing and what actions are needed. This was accomplished by conducting four (4) 90 minute monthly forums, a statewide survey, and four (4) public forums in June thru July. Through this process MDA formed two (2) fair housing focus group committees. The PHA Fair Housing Outreach Committee was one of these groups. We also had the privilege of attending the MAHRO Annual Conference in August in which you presented the Draft 2014 Analysis of Impediments for Fair Housing Choice.

We would like to express our appreciation to MDA for reaching out to MAHRO and its membership concerning the Analysis of Impediments to Fair Housing Choice.

The West Point Housing Authority would like to include the following additional impediments:

1. Inability to follow ADA, UFAS Guidelines

The West Point Housing Authority consists of 190 units Public Housing units ranging in size from 0 – 5 bedroom size located in 6 sites throughout the City of West Point. Over one-half of our housing stock is 63 years old with the newest being 38 years old. In 1992 we were required to meet the 504 handicap accessibility requirements. At that time anything constructed prior to 1976 was exempt from these requirements. Now ADA and UFAS requirements have come into existence and Fair Housing is enforcing Housing Authorities to comply with these regulations. To meet the requirements, our authority would have to completely remodel the interior which would be cost prohibitive. With insufficient funds to make our units accessible and UFAS compliant, it is impossible for us to meet these requirements. We feel that any units built prior to 1976 should still be exempt or HUD should provide the funding needed in order for us to be in compliance.

2. Accessibility to HOME and other housing improvement funds provide through the State

Due to requirements set by the State today, Housing Authorities are not able to obtain HOME funds and other housing improvement funds that are offered through the State. We would like for the State to assist Housing Authorities by providing more accessibility to HOME funds, set aside tax credit allocations as well as other housing improvement funds. This would help in our effort to provide choices of housing to the families that we serve in our community. According to the Market Study that was conducted in 2013, it was determined that the City of West Point is in need of additional affordable housing.

After reviewing and discussing the proposed MDA's 2014 Analysis of Impediments to Fair Housing Choice with our housing authority staff, we concur with the identified Private and Public Impediments as outlined.

Sincerely,



Kaye Judson
Executive Director
West Point Housing Authority



Bob Farrar
Director of Operations
West Point Housing Authority

**The Housing Authority of the City of Winona, MS
P.O. Box 127
Winona, Mississippi 38967**

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EXECUTIVE DIRECTOR

MRS. MAGGIE W. FORREST
200 BRISCOE STREET
PHONE 662-283-2575
FAX 662-283-2576
E-Mail whousing@duckwood.net

Ray Robinson, Jr
Manager, Compliance Bureau
Mississippi Development Authority
Post Office Box 849
Jackson, Mississippi 39205



MDA
COMMUNITY SERVICES DIV.

RE: Public Impediments

Mississippi Development Authority,

Thanks to the Mississippi Development Authority for the opportunity to comment on factors that are Impediments to Furthering Fair Housing encountered by the Housing Authority's within the State of Mississippi.

HUD states that impediments are barriers that affect the rights of fair housing choice. These impediments are defined as any action, 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.

We, as a Public Housing Authority, concur with the Public Impediments 1 - 5 as identified in MDA's 2014 Analysis of Impediments Study. However, housing authority's across the State are battling a continuing decline in the funding required to maintain existing public housing much less construct new dwelling's to meet current needs as identified by the waiting list at housing authority's in Mississippi.

With this in mind, we consider the number one Public Impediment to be a lack of available funding.

Regards,

Maggie W. Forrest
Maggie W. Forrest
Executive Director



HOUSING AUTHORITY—LAUREL

701 BEACON STREET • P.O. DRAWER 2910 • LAUREL, MISSISSIPPI 39442
PHONE (601) 425-4651 • FAX (601) 425-7977 • TDD (425-7972) • EMAIL: laurel@laurelha.net

AILRICK D. YOUNG, PHM
Executive Director

October 1, 2014

Ray Robinson, Jr
Manager, Compliance Bureau
Mississippi Development Authority
Post Office Box 849
Jackson, Mississippi 39205

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OCT - 2 2014

MDA
COMMUNITY SERVICES DIV.

RE: Public Impediments

Dear Mississippi Development Authority:

Thanks to the Mississippi Development Authority for the opportunity to comment on factors that are Impediments to Furthering Fair Housing encountered by the Housing Authority's within the State of Mississippi.

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However, housing authority's across the State are battling a continuing decline in the funding required to maintain existing public housing much less construct new dwelling's to meet current needs as identified by the waiting list at housing authority's in Mississippi.

With this in mind, we consider the number one Public Impediment to be a lack of available funding.

Regards,

Ailrick D. Young
Executive Director

BOARD OF COMMISSIONERS
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Equal Opportunity In Housing, Employment, Procurement and Services



Post Office Box 908
Clarksdale, Mississippi 38614

THE HOUSING AUTHORITY OF THE CITY OF CLARKSDALE
Telephone: (662) 624-8030 • Fax: (662) 627-3341 • E-mail: ras_cha@bollsouth.net

Royal Ann Spencer
Executive Director

October 1, 2014

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OCT - 1 2014

Mississippi Development Authority
Post Office Box 849
Jackson, Mississippi 39205

MDA
COMMUNITY SERVICES DIV.

REF: Concurrence with State of MS MDA draft Analysis of Impediments to Fair Housing Choice

Dear Mr. Robinson:

Please be advised, the Clarksdale Housing Authority has completed the review of the 2014 draft Analysis of Impediments to Fair Housing Choice (AI) and hereby offer our concurrence with the identified Private and Public Impediments as identified.

The Clarksdale Housing Authority owns/manages 296 low income housing units divided among four sites in Coahoma County, Clarksdale, MS. We concur with President Cameron's March 27, 2014, letter to you that the lack of funding and outdated housing stock remains the major factors in ensuring compliance.

We will conduct meetings with our residents focusing on Fair Housing to further educate our residents on matters related to Fair Housing. I'm confident further educational meeting will be established.

In conclusion, we concur with the 2014 draft Analysis of Impediments and will work collectively towards overcoming barriers faced by our low income residents and our community at large.

You may contact me at 662-624-8030 should you have any questions or need additional information.

Thank you,

Royal Ann Spencer
Executive Director

ABERDEEN HOUSING AUTHORITY

P.O. BOX 69 • 910 MARTIN LUTHER KING STREET
ABERDEEN, MISSISSIPPI 39730
(662) 369-9460 • FAX (662) 369-3366
dda@berha@hellsouth.net
aberdeensulm.org

COMMISSIONERS

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TERRY SMITH, VICE CHAIRPERSON
BETTY JACKSON, COMMISSIONER
ANN TACKETT, COMMISSIONER
JOYCE VASSER, COMMISSIONER

EXECUTIVE DIRECTOR
DENISE DOBBS, PUM

ATTORNEY
MICHAEL CHASE

Ray Robinson, Jr
Manager, Compliance Bureau
Mississippi Development Authority
Post Office Box 849
Jackson, Mississippi 39205

RECEIVED
OCT - 1 2014

MDA
COMMUNITY SERVICES DIV.

RE: Public Impediments

Mississippi Development Authority,

Thanks to the Mississippi Development Authority for the opportunity to comment on factors that are Impediments to Furthering Fair Housing encountered by the Housing Authority's within the State of Mississippi.

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We, as a Public Housing Authority, concur with the Public Impediments 1 - 5 as identified in MDA's 2014 Analysis of Impediments Study.

However, housing authority's across the State are battling a continuing decline in the funding required to maintain existing public housing much less construct new dwelling's to meet current needs as identified by the waiting list at housing authority's in Mississippi.

With this in mind, we consider the number one Public Impediment to be a lack of available funding.

Regards,



Executive Director

The Housing Authority of the City of Iuka, MS
P.O. Box 267 Iuka, Mississippi 38852

October 1, 2014

BOARD OF COMMISSIONERS
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Nan Lyles, COMMISSIONER
James Walker, COMMISSIONER
Nancy Brinkley, COMMISSIONER

EXECUTIVE DIRECTOR
Onita Howell
1629 Whitehouse Road
PHONE 662-423-9232
FAX 662-423-9233
E-Mail iukaha@bellsouth.net

Ray Robinson, Jr
Manager, Compliance Bureau
Mississippi Development Authority
Post Office Box 849
Jackson, Mississippi 39205

RECEIVED
OCT - 1 2014

MDA
COMMUNITY SERVICES DIV.

RE: Public Impediments

Mississippi Development Authority,

Thanks to the Mississippi Development Authority for the opportunity to comment on factors that are Impediments to Furthering Fair Housing encountered by the Housing Authority's within the State of Mississippi.

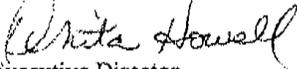
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With this in mind, we consider the number one Public Impediment to be a lack of available funding.

Regards,


Executive Director

Housing Authority of Iuka
 P O Box 267
 1629 Whitehouse Road
 Iuka, MS 38852
 662.423.9232 | 662.423.9233 |
<http://housingauthorityiuka.ybsitecenter.com/>

fax

TO: Ray Robinson FROM: Quita Howell
 FAX: (601) 359-3108 PAGES: 2
 PHONE: (601) 359-9273 DATE: 10/1/14
 RE: Public Impediments CC:

Urgent For Review Please Comment Please Reply Please Recycle

Comments:

Please accept the following page as A Revised letter Regarding Public Impediments for the Iuka Housing Authority. Sorry for Any Inconvenience this may cause, Thank you -

Quita Howell

Also, I mailed a hard copy of previous letter & I will be putting this one in the mail as well -

**MISSISSIPPI
CENTER
FOR JUSTICE**

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A Mississippi Nonprofit Corporation

September 29, 2014

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MDA
COMMUNITY SERVICES DIV.

Ray Robinson, Bureau Manager
Community Services Division, Compliance Bureau
Mississippi Development Authority
P.O. Box 849
Jackson, MS 39205

RE: Comments to the MDA Draft 2014 Analysis of Impediments to Fair Housing Choice (AI)

Dear Ray,

I am writing on behalf of the Mississippi Center for Justice to provide our organization's comments to the MDA draft 2014 Analysis of Impediments to Fair Housing Choice (AI). The purpose of these comments is to 1) provide constructive suggestions for strengthening the AI as a document that fully and accurately identifies the impediments to fair housing choice that exist in Mississippi; and 2) propose additional corrective action steps by the state that are not included in the AI.

The Mississippi Center for Justice is a non-profit, public interest law firm founded in 2003 with the mission of advancing racial and economic justice in the state. The Center has offices in Jackson, Indianola and Biloxi and works to advance policy change in the areas of housing, health, education, and consumer law. In the aftermath of Hurricane Katrina, housing issues – including fair housing and affordable housing – formed the centerpiece of the Center's efforts to promote an equitable recovery for all Mississippians.

The Mississippi Center for Justice is also the recipient of a 2013 HUD FHOI grant to support fair housing education and enforcement. The activities supported by this grant include fair housing education and outreach, systemic and investigative testing for fair housing violations and enforcement, including the filing of complaints with HUD. This grant promotes the development of existing non-profit organizations working to advance fair housing by expanding and supporting the ability of such organizations to perform fair housing testing and enforcement.

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Ray Robinson, Bureau Manager
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Mississippi Development Authority
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The Mississippi Center for Justice participated in public forums held in Hattiesburg and Jackson by the Mississippi Development Authority for the purpose of obtaining input from community-based organizations and other stakeholders regarding impediments to fair housing choice in Mississippi. The comments of the Mississippi Center for Justice's representative at these hearings are transcribed in the AI. The Center for Justice greatly appreciates the opportunity to participate in these public forums and it is in the same spirit of participation that the Center provides these written comments to the draft AI.

The Mississippi Center for Justice has reviewed the comments prepared by the Lawyers' Committee for Civil Rights Under Law and concurs with same in their entirety. Accordingly, the Mississippi Center for Justice adopts and incorporates the Lawyers' Committee comments in their entirety as if fully set forth herein. In particular, the Center would like to reinforce the Lawyers' Committee's comment regarding the need for a thorough analysis of the effect of the state's administration of HOME, CDBG and LIHTC programs and how that administration affects residential segregation and the concentration of lower-income housing in selected areas of the state.

The draft AI does not fully and accurately identify the impediments to fair housing choice that exist in Mississippi.

In each of the community forums attended by a representative of the Mississippi Center for Justice, the absence of a state fair housing law was cited as a primary impediment to fair housing choice in Mississippi. Mississippi is one of a very small minority of states that lack such a law. Though the body of the report includes a discussion of the benefits to be realized by a state with a "substantially equivalent" fair housing law and a state agency to enforce such a law, the AI does not cite the absence of a state fair housing law as an impediment and proposes no action steps to address this impediment.

Similarly, the effects of exclusionary zoning ordinances were repeatedly cited by stakeholders during the public forums and by survey respondents. Such ordinances – many of which prohibit or sharply limit the development of affordable multi-family housing – have the effect of supporting the demographics of "white flight" in those counties surrounding Jackson, Mississippi. Exclusionary zoning should be cited as an impediment to fair housing choice and an action plan should be set forth to combat this problem.

Although a high volume of stakeholder feedback highlighted the need for greater access to public transportation, the draft does not cite the lack of public transportation as an impediment.

The Center for Justice specifically identified the lack of a statewide affordable housing trust fund as an impediment to fair housing choice during the public forums. Forty-seven states and approximately 75 municipalities have adopted affordable housing trust funds. It is a proven tool

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for increasing the stock of affordable housing and has the added capability to target those living at or below 30% of AMI. The absence of a statewide affordable housing trust fund should be cited as an impediment.

The draft AI fails to address the needs of special populations including those living with HIV and the disabled, particularly the developmentally disabled. In December of 2011, following an extensive investigation, the U.S. Department of Justice issued a letter of findings to the State of Mississippi, the State Health Department, the State Division of Medicaid and others concluding that the state was in non-compliance with the Olmstead requirement to treat those with developmental disabilities in the least restrictive and most integrated community setting. The DOJ found that Mississippi – more than any other state in the nation – relied heavily on institutionalization of this population and that many institutionalized individuals could be supported with services in non-institutional settings. Resolution of this issue, whether through state vouchers, the creation of community based housing, or some combination of the two, will implicate fair housing concerns. The lack of sufficient community housing for special needs populations should be cited as an impediment to fair housing choice.

The draft AI does not set forth sufficient corrective actions by the state.

In general, the corrective actions identified in the draft AI are minimal and unlikely to have any significant impact upon the real barriers to fair housing choice that exist in Mississippi.

The draft AI lists “[i]nsufficient understanding of fair housing laws” as the number one public sector impediment to fair housing choice and “outreach and education” as the proposed corrective action. This impediment (or a similarly worded version) has been identified in every AI created by the State of Mississippi and the same (or similarly worded) corrective action proposed. Clearly, either the problem has been misdiagnosed or the remedy has been inadequately implemented. The action should be defined more specifically in terms of the number and location of outreach events and the outcome should be measured more specifically.

The draft AI lists “[i]nsufficient fair housing testing and enforcement in non-entitlement areas of Mississippi” and then proposes as a corrective action creating an “inventory” of HUD FHIP grantees in the state and then having “exploratory discussions” with these FHIP grantees about performing testing and enforcement in the state. First, the Center for Justice is the only FHIP grantee in the state currently funded to conduct enforcement activities and the AI acknowledges this fact on p. 66, so the creation of an inventory of FHIP grantees should not prove time-consuming. Secondly, and more importantly, the corrective action seeks to shift the state’s responsibility of addressing the identified impediment. The purpose of the AI process is to obtain a commitment from the state to take policy action to affirmatively further fair housing as a condition of receiving CDBG funds from HUD. Here, the state – which could take direct and

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concrete steps to enforce the Fair Housing Act – proposes instead to ask FHIP recipients to do the work.

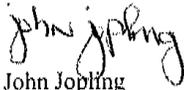
With regard to Public Sector Impediment 3 (the lack of a state fair housing infrastructure) and the proposed corrective action, the Center for Justice has the same objection as to Impediment 2 above.

With regard to Public Sector Impediment 4 (the lack of understanding of fair housing duties) and the proposed corrective action, the Center for Justice has the same objection as to Impediment 1 above.

With regard to Public Sector Impediment 5 (overconcentration of lower-income housing in selected areas of the state) and the proposed corrective action, the Center for Justice would emphasize the need to examine the state's administration of HOME, CDBG and LIHTC programs in order to evaluate the role that such administration plays in creating this impediment and the policy changes necessary to reduce the impediment.

The Center for Justice would like to thank your agency once again for the opportunity to participate in this process. The Center urges you to seriously consider our comments and adopt the recommendations set forth in this letter. If you have any questions or require any further information, please do not hesitate to contact me.

Truly,



John Jopling
Director of Housing Law
Mississippi Center for Justice
Gulf Coast Office
963 Division Street
Biloxi, MS 39530
(228) 702-9985

JJ/sw

cc: Marilyn Moore Lemons
Joseph D. Rich
Thomas Silverstein

**The Housing Authority of the City of Iuka, MS
P.O. Box 267
Iuka, Mississippi 38852**

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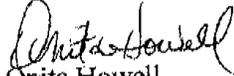
MDA
COMMUNITY SERVICES DIV.

September 29, 2014

Dear Mr. Robinson,

Iuka Housing Authority agrees with the findings of the Analysis of Impediments conducted by the Mississippi Development Authority and I would like the opportunity to share any local conditions for consideration as they may arise.

Sincerely,


Onita Howell
Executive Director



HOUSING AUTHORITY OF THE CITY OF LOUISVILLE, MISSISSIPPI

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RE: Public Impediments

Mississippi Development Authority.

Thanks to the Mississippi Development Authority for the opportunity to comment on factors that are Impediments to Furthering Fair Housing encountered by the Housing Authority's within the State of Mississippi.

HUD states that impediments are barriers that affect the rights of fair housing choice. These impediments are defined as any action, 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.

We, as a Public Housing Authority, concur with the Public Impediments 1 - 5 as identified in MDA's 2014 Analysis of Impediments Study.

However, housing authority's across the State are battling a continuing decline in the funding required to maintain existing public housing much less construct new dwelling's to meet current needs as identified by the waiting list at housing authority's in Mississippi.

With this in mind, we consider the number one Public Impediment to be a lack of available funding.

Regards,

Ginger H. Ming
 Executive Director