# **2010** Analysis of Impediments to Fair Housing Choice

**STATE OF LOUISIANA** 

FINAL REPORT

APRIL 28, 2010



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# 2010 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

## **STATE OF LOUISIANA**

Sponsored by: The Louisiana Office of Community Development

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# HAS YOUR RIGHT TO FAIR HOUSING BEEN VIOLATED?

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

Louisiana Department of Justice Office of the Attorney General Public Protection Division 1885 North 3<sup>rd</sup> Street Baton Rouge, LA 70802 HUD@ag.state.la.us Fair Housing Hotline: 1-225-326-6400 1-800-273-5718

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## **ACRONYMS**

American Community Survey Administrative Enforcement Initiative Analysis of Impediments Bureau of Economic Analysis Bureau of Labor Statistics Community Development Block Grant Education and Outreach Initiative Emergency Shelter Grant Greater New Orleans Fair Housing Action Center Fair Housing Assistance Program Office of Fair Housing and Equal Opportunity Fair Housing Initiative Program Fair Housing Organization Initiative Fair Housing Organization Initiative Fair Housing Working Group High Annual Percentage Rate Loan Home Mortgage Disclosure Act HOME Investment Partnerships Program Housing Opportunities for Persons with AIDS United States Department of Housing and Urban Development
5 I.
Louisiana Department of Justice Private Enforcement Initiative

# **EXECUTIVE SUMMARY**

#### BACKGROUND

Entitlement jurisdictions are required to submit to the U.S. Department of Housing and Urban Development (HUD) certification of affirmatively furthering fair housing. This certification has three elements, which require that entities:

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

An Analysis of Impediments to Fair Housing Choice (AI) is an examination of the impediments or barriers to fair housing that affect protected classes within a geographic region. HUD defines impediments to fair housing choice in terms of their applicability to state and federal law. In Louisiana, this would include:

- Any actions, omissions or decisions taken on the basis of race, color, religion, sex, disability or handicap, familial status, national origin, or religion (protected classes) which restrict housing choices or the availability of housing choice.
- Any actions, omissions or decisions which have the effect of restricting housing choices or the availability of housing choice on the basis of the protected classes listed previously.

The AI process involves a thorough examination of a variety of sources related to housing, affirmatively furthering fair housing, the fair housing delivery system and housing transactions, which affect people who are protected under fair housing law. AI sources include census data; home mortgage industry data; federal, state and local housing complaint data; surveys of housing industry experts and stakeholders; and other housing information.

An AI also includes an active and involved public input and review process via direct contact with stakeholders, public forums to collect input from citizens, distribution of draft reports for citizen review and formal presentation of findings.

## COMMUNITY PROFILE

## Demographics

The population in the state of Louisiana declined slightly from 2000 to 2007 by 2.1 percent, resulting in a net loss of 95,666 inhabitants. The population of older age cohorts experienced a large amount of growth in the same period, especially in the 55 to 64 age cohort, while the number of persons aged 44 years and younger decreased. Intercensal

estimates showed negative population growth rates for all age cohorts 54 years old and younger and positive population growth for age cohorts 55 years or older.

In 2000, blacks comprised the largest minority racial group with 1,451,944 people or 32.4 percent of the population. The urban areas of the state tended to have the highest concentration of the black population, with some census tracts showing a 100.0 percent black population in 2000. Both blacks and whites experienced moderate declines in their size from 2000 to 2008, while all other racial groups grew in size, with the Hispanic population expanding most rapidly. From 2005 to 2007 the growth rates for blacks, whites and American Indians were negative, with the black population decreasing twice as much as the white population.

Louisiana's population had a disability rate of 21.8 percent in 2000, and the majority of disproportionate shares of disabled populations were located in the urban areas of Louisiana.

#### Economics

The labor force, defined as people working or looking for work, grew from 1,877,388 to 2,078,935 from 1990 to 2008, a gain of 10.7 percent. Unemployment fell by more than 14,000 individuals during the same time period, resulting in the unemployment rate changing from 5.9 percent in 1990 to 4.6 percent in 2008.

In terms of earnings and income, average real earnings per job increased by just under \$6,000 from 2000 to 2007, from \$38,380 to \$44,038. Another measure, per capita income, also increased in the same time period from \$28,242 in 2000 to \$35,844 in 2007. The poverty rate was 19.6 percent in 2000 with just under 320,000 inhabitants under the age of 18 experiencing poverty. Disproportionate shares of poverty were well distributed through all areas of the state, but extreme concentrations of poverty were observed mostly in urban areas.

## Housing

Of the housing stock in Louisiana in 2000, 1,255,030 units were single-family units, 74,492 units were duplexes, 83,524 units were tri- or four-plexes, 188,052 units were apartments, 240,944 units were mobile homes, and 5,129 units were boats, RVs, or vans. Of those total units, 1,124,995 were owner-occupied and 531,058 were renter-occupied, for a home ownership rate of 67.9 percent. More than 191,000 units were vacant, and, of those, 54,341 were for rent and 23,491 were for sale. Between 2005 and 2007 there was a decrease in single-family, apartment, duplex, and multiplex units while the number of mobile homes and boat, RV, and van units increased. The number of renter-occupied owner-occupied units decreased and there were slightly fewer vacant housing units.

Louisiana had a small number of households, 57,282, that experienced overcrowding in 2000. Those households that experienced severe overcrowding were even fewer at 29,144, or 1.8 percent of all households. Renters tended to have overcrowded and severely

overcrowded households more often than homeowners. Between 2005 and 2007 there was a slight increase in the number of owner-occupied households with overcrowding, from 1.7 percent in 2005 to 1.8 percent in 2007, while renter-occupied households with overcrowding saw a larger increase, moving from 3.7 percent in 2005 to 4.5 percent in 2007. In 2000, a combined 36.0 percent of renters had a cost burden or a severe cost burden as opposed to 24.3 percent of homeowners with mortgages with cost burdens or severe cost burdens. From 2005 to 2007, the percentage of owners with mortgages with a cost burden increased from 28.5 percent to 29.6 percent, while the number of renters with a cost burden decreased slightly from 42.9 percent to 42.4 percent.

#### LENDING PRACTICES

#### Lending Activity

Several federal laws affect lending practices, such as the Fair Housing Act, the Equal Credit Opportunity Act, the Community Reinvestment Act and the Home Mortgage Disclosure Act (HMDA). HMDA data are the most inclusive lending data available and were used to analyze lending practices in the state of Louisiana. HMDA data for the state of Louisiana from 2002 to 2007 showed 2,101,926 loan applications were processed for home purchases, home improvements and refinancing, with 692,990 loan applications for owner-occupied home purchases.

#### **Denial Rates**

In regard to the 692,990 owner-occupied home purchase applications, excluding loan applications that were withdrawn by the applicant, incomplete or accepted by the prospective lender but not exercised by the applicant, there were 328,211 loan originations and 113,724 loan denials for an average loan denial rate of 25.7 percent. The most common reasons for denial of an owner-occupied loan applicant were credit history and debt-to-income ratio. Denial rates were not even; whites had a denial rate of 20.7 percent, while blacks and Hispanics had higher denial rates of 37.9 and 26.8 percent, respectively.

Higher rates of denial for racial and ethnic minorities, regardless of income, were also measured. Blacks experienced much higher loan denial rates than whites at all income levels. White applicants with incomes below \$15,000 dollars were denied 57.3 percent of the time, while black applicants in the same income range were denied 68.2 percent of the time. This was also true for applicants with incomes above \$75,000, wherein whites had a denial rate of 10.6 percent and blacks had a denial rate of 25.1 percent. These higher denial rates were also observed in specific areas of the state.

### High Annual Percentage Rate Loans

HMDA data report loan originations with unusually high annual percentage rate loans, or HALs, which are loans that may be considered predatory in nature. While whites had 20.9 percent of owner-occupied loans as HALs, blacks had more than double this rate at 43.9 percent. Hispanics had a moderate rate of HALs at 28.3 percent. These minority groups tended to carry a disproportionately higher share of foreclosure risk due to such high numbers of home purchase HALs.

## FAIR HOUSING PROFILE

## Fair Housing Studies and Cases

Several national fair housing studies and cases revealed that, despite efforts to curb housing discrimination in the U.S., problems still exist in terms of discrimination against ethnic and racial minorities, discrimination against persons with disabilities, and residential segregation resulting from current housing efforts. National studies also revealed that there are issues of a lack of awareness of fair housing laws and protected classes.

A review of statewide fair housing studies and cases showed that the fair housing situation in Louisiana has been greatly affected by recent natural disasters, such as Hurricanes Katrina and Rita. Fair housing studies from the last five years showed that racial and ethnic minorities have faced discrimination in efforts to find housing in terms of discriminatory terms and conditions and advertising for rental properties. Additionally, several communities in the state enacted laws after the storms that may have encouraged residential segregation. Fair housing cases highlighted discrimination against persons with disabilities and ethnic and racial minorities.

## Fair Housing Complaint Data

Fair housing complaint data collected from the U.S. Department of Housing and Urban Development and the Louisiana Department of Justice showed that more than 1,200 complaints were filed in the state of Louisiana in the last nine to ten years. Most complaints were filed on the bases of race or disability and were either found to have no cause or were settled successfully.

## Fair Housing Survey Data

A fair housing survey was conducted throughout Louisiana and showed that most respondents were aware of fair housing laws and find them easy to understand. Many respondents noted issues of government actions or policies representing barriers to fair housing or specific areas within the entitlement that have fair housing problems. There was also substantive confusion about the difference between affordable housing planning and production and landlord/tenant law and affirmatively furthering fair housing. Furthermore, respondents expressed concerns about discrimination in the rental markets as well as an overall lack of understanding of fair housing law. Respondents, who were supposed to represent an expert community, did not seem to fully be aware of the fair housing responsibilities of the Louisiana Department of Justice. Last, the majority of respondents noted that there is a lack of fair housing outreach and education efforts in their community.

### **IDENTIFIED IMPEDIMENTS TO FAIR HOUSING CHOICE**

In 2009, a substantive analysis of impediments to fair housing choice was initiated statewide by the Louisiana Office of Community Development. Near the close of the calendar year, a strategy session was held in Baton Rouge with the Office of Community Development and participating entitlements throughout the state. The outcome of this strategy session was the identification of specific statewide impediments or concerns and a set of corresponding statewide fair housing actions directed toward mitigating, lessening or eliminating the identified impediments.

#### Impediments to Fair Housing Choice

#### Three Categories:

- A. Insufficient fair housing system capacity that limits access to the system and the ability to respond to fair housing needs.
- B. Insufficient or ineffective communication and coordination among agencies and those interested in affirmatively furthering fair housing.
- C. Lack of understanding of fair housing by both consumers and providers.

#### A. Insufficient Fair Housing System Capacity

- 1. Insufficient fair housing system capacity to respond to questions or concerns or to address fair housing needs (outside of New Orleans).
- 2. Lack of effective referral system, as interested persons are referred to many different places.
- 3. Poor documentation of fair housing activities or lack of interest in sharing information.
- 4. Alleged use of zoning and land use regulations to discriminate by units of local government.

#### B. Ineffective Communication and Coordination

5. Inadequate communication efforts between fair housing entities and agencies charged with affirmatively furthering fair housing.

#### C. Lack of Understanding of Fair Housing

6. Lack of sufficient fair housing outreach and education resulting in:a. Lack of understanding of fair housing issues and knowledge of fair housing laws,

- b. Confusion about the differences between fair housing, housing production planning, and landlord/tenant issues,
- c. Insufficient interest in fair housing activities in some communities,
- d. Lack of desire to affirmatively further fair housing, and
- e. Some local government actions may not be in the spirit of affirmatively furthering fair housing.
- 7. Lack of sufficient financial literacy resulting in:
  - a. Disproportionately high denial rates for racial and ethnic minorities,
  - b. Denial rates disproportionately high in lower-income areas, and
  - c. Originated high annual percentage rate loans targeted to minority areas.
- 8. Discrimination in rental markets.
- 9. Failure to make reasonable accommodation, particularly in rental markets.

## Suggested Actions to Consider

## Three Goals:

- A. Improve fair housing system capacity, access to system and ability to respond to needs.
- B. Improve communication and coordination among agencies and those interested in affirmatively furthering fair housing.
- C. Enhance understanding of fair housing by both consumers and providers.

## A. Improve Fair Housing System Capacity

- 1. Build additional fair housing system capacity.
  - a. Enhance departmental resources by acquiring seasoned and experienced personnel familiar with fair housing and affirmatively furthering fair housing.
  - b. Establish additional Fair Housing Initiative Program (FHIP) recipients in the state.
    - i. Provide technical assistance or other assistance to aid in creation of these entities, thereby providing better coverage in other areas of the state.
  - c. Establish the Louisiana Fair Housing Working Group (FHWG), a statewide entity charged with reviewing and setting statewide fair housing policy actions. The lead agency might best be one with ties throughout the state, such as the Louisiana Housing Finance Agency. The FHWG would:
    - i. Be comprised of individuals from entitlements and state agencies,
    - ii. Meet periodically with meeting locations rotating geographically,
    - iii. Offer oversight of statewide policies and actions,
    - iv. Include a budget for funding actions to occur,
    - v. Accept funding from everyone in the FHWG, such as through a percent of HUD formula allocation; funding could also come from contributions by private industry or other interested government agencies,
    - vi. Research and coordinate efforts to establish the FHWG as a non-profit entity so that private contributions could be tax deductible.
- 2. Develop consistent referral system and distribute to responsible agencies. This would: a. Be created through decisions by the FHWG.

- b. Streamline and condense referral system to fewer "doors" to improve access to the fair housing system.
- 3. Improve documentation of fair housing enforcement activities. The FHWG would recommend and set policy on fair housing reporting, such as:
  - a. Better tracking number of cases and basis of complaint,
  - b. Better tracking number and types of discriminatory issues, and
  - c. Better facilitating record keeping for outreach, education, testing and enforcement activities.
- 4. Inform units of local government on what types of zoning and land use regulations might be construed to be discriminatory.
  - a. The FHWG would study and make specific recommendations.
  - b. The FHWG would conduct research to uncover best practices.

#### B. Increase Communication and Coordination

- 5. Improve communication between fair housing agencies and agencies charged with affirmatively furthering fair housing.
  - a. The FHWG should coordinate an inter-agency approach including all entitlements, Louisiana Department of Justice, Louisiana Housing Finance Agency.
  - b. Members of the FHWG should share experiences of fair housing entities, set schedule of actions and make recommendations.
  - c. The FHWG should review prospective communication barriers and why they are occurring, including suggesting methods for improvement of both reporting and communication.

## C. Enhance Understanding of Fair Housing for Both Consumers and Providers

- 6. Enhance fair housing outreach and education for both consumers and providers.
  - a. Improve understanding of fair housing and fair housing law by:
    - i. Conducting public educational or public relations activities such as holding webbased seminars, outreach seminars and other teaching and instructional actions or tools for enhancing understanding of fair housing law.
    - ii. Creating learning opportunities, especially for selected groups.
  - b. Lessen or eliminate confusion between fair housing, planning for affordable housing production, and landlord tenant issues. The FHWG would draft a policy statement illuminating the differences between these issues.
  - c. Advise units of local government about responsibilities pertaining to fair housing and which land use policies may be construed to be discriminatory.
  - d. Encourage both entitlement and non-entitlement communities to affirmatively further fair housing by:
    - i. Researching and preparing examples of best practices,
    - ii. Researching and preparing prospective liabilities documented in case history.
- 7. Enhance the financial literacy of Louisiana residents, by
  - a. Enhancing first-time homebuyer education courses,

- b. Enhancing consumer understanding and knowledge of credit, how to obtain and keep good credit, etc. through public service ads, web-based seminars, and other outreach and education activities.
- c. These steps should result in:
  - i. Reducing disproportionately high denial rates,
  - ii. Reducing concentration of denial rates in selected lower-income areas,
  - iii. Reducing or eliminating the targeting of high annual percentage rate loans.
- d. Track future HMDA data for progress toward these goals.
- 8. Reduce or eliminate discrimination in rental markets.
  - a. Contact property management firms, associations and landlords and reach out to them for enhancing understanding of fair housing law.
  - b. Prepare lists of best and worst practices, liabilities and lessons learned, and share this with the property management firms, associations and landlords.
- 9. Encourage rental managers to accept requests for reasonable accommodation.
  - a. Communicate with rental managers to advise them of responsibilities pertaining to reasonable accommodation.
  - b. Conduct audit testing of newly constructed rental properties to measure compliance with current fair housing law and the Americans with Disabilities Act.

#### Suggested Two-Year Fair Housing Action Plan

The state of Louisiana has 14 HUD-designated entitlement communities, with the Louisiana Office of Community Development and the Louisiana Housing Finance Authority being the HUD grantees for the balance of the state. To better and more effectively affirmatively further fair housing, each of these government entities should consider taking the following actions:

- 1. Form a working group that will have the authority to determine, fund and take specific actions to affirmatively further fair housing throughout the state. This group will be identified by the end of December 2010.
  - a. During the July 1 through December 31, 2010 time period the group will accomplish the following:
    - i. Elect chair, vice chair and treasurer for the group;
    - ii. Determine meeting schedule and frequency, such as monthly or quarterly, as well as the location parameters, such as rotating locations or fixed locations;
    - iii. Prepare a list of fair housing activities to be undertaken, such as outreach and education, audit testing, or fair housing documentation procedures;
    - iv. Prepare a set of draft RFPs to be released that will hire contractors to conduct the fair housing activities. Each will have specific measurement criteria so that fair housing activities that are undertaken can be measured;
    - v. Invite the Louisiana Department of Justice to participate in affirmatively furthering fair housing and in the operation of the working group;

- vi. Develop a consistent fair housing referral system and distribute to all group members and have the members distribute this within their own communities.
- b. During the January 1, 2011 through June 30, 2011 time period, accomplish the following organizational and activity objectives:
  - i. Determine which entitlement or work group participant is to be the fiscal agent;
  - ii. Sign contracts with the fiscal agent and the fiscal agent signs contracts with the working group participants;
  - iii. Determine the precise CPD allocation percent that will represent the funding source. This represents a uniform portion or share of the HUD CPD allocation received by each of the participants;
  - iv. Send allocations to fiscal agent;
  - v. Finalize the RFP documents and release the RFPs for bid.
- c. During the second year of the existence of the working group the following actions should be considered:
  - i. Elect a new chairman, vice chair and treasurer;
  - ii. Determine meeting schedule and frequency, such as monthly or quarterly, as well as the location parameters, such as rotating locations or fixed locations;
  - iii. Select contractors to conduct the bid fair housing activities and initiate all projects;
  - iv. Have the treasurer initiate payments to the selected contractors;
  - v. Have the treasurer research the feasibility of converting the working group to a non-profit corporation, with the participants as members and without any payroll. This will allow private companies to contribute tax-deductable contributions to the fair housing organization;
  - vi. Determine if non-profit status will be beneficial for the group;
  - vii. Prepare a list of fair housing activities to be undertaken during the upcoming year, such as outreach and education, audit testing, or fair housing documentation procedures;
  - viii. Send fiscal agent budget allocations;
  - ix. Issue a progress review document that evaluates the contracted fair housing activities for effectiveness;
  - x. Revise or enhance the description of fair housing activities to be conducted in the next year;
  - xi. Determine the precise CPD allocation percent that will represent the funding source. This represents a uniform portion or share of the HUD CPD allocation received by each of the participants;
  - xii. Finalize the RFP documents and release the RFPs for bid;
  - xiii. Decide on fair housing contractors to be used for the second round of Louisiana fair housing activities.

# SECTION I. INTRODUCTION

### BACKGROUND

Title VIII of the 1968 Civil Rights Act, known as the Fair Housing Act, made it illegal to discriminate in the buying, selling or renting of housing because of 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 United States legislation:

- The Fair Housing Act;
- The Housing Amendments Act; and
- The Americans with Disabilities Act.

State or local government may also enact a fair housing law that extends protection to these or other groups. For example, the Louisiana Equal Housing Opportunity Act offers protections that are identical to national law, but in Orleans Parish the national protections – race, color, religion, national origin, sex, familial status and disability – are extended to include sexual orientation, gender identification, marital status and age.

#### WHY ASSESS FAIR HOUSING?

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

In 1994, HUD published a rule consolidating its housing and community development programs into a single plan: the *Consolidated Plan for Housing and Community Development*. This document incorporates the plans for the consolidated programs, which include Community Development Block Grants (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grants (ESG) and Housing Opportunities for Persons with AIDS (HOPWA).

In exchange for receiving funds from HUD for these programs, and as a part of the Consolidated Planning process, states and entitlement jurisdictions are required to submit certification to HUD that they are affirmatively furthering fair housing. This certification has three parts and requires that government entities:

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

HUD interprets these three certifying elements to mean:

- Analyzing and working to eliminate housing discrimination in the jurisdiction;
- Promoting fair housing choice for all people;
- Providing opportunities for racially- and ethnically-inclusive patterns of housing occupancy;
- Promoting housing that is physically accessible to, and usable by, all people, particularly individuals with disabilities;
- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act.<sup>1</sup>

#### PURPOSE

Thus, the purpose of an AI is to evaluate a broad range of quantitative and qualitative data, document identified impediments to fair housing choice, and to suggest actions that can be considered in working toward overcoming or mitigating the identified impediments.

#### LEAD AGENCY

The Louisiana Office of Community Development sponsored this study on behalf of each of the state's entitlements, with the non-entitlement portion or balance of the state represented as a separate geographic area. A list of the entitlements in Louisiana is presented at right.<sup>2</sup>

The Louisiana Office of Community Development is the local agency charged with preparing the Consolidated Plan as well as providing certification for affirmatively furthering fair housing in the state of Louisiana. Western Economic Services, LLC, a Portland, Oregon-based consulting firm specializing in analysis and research in support of housing and community development planning, prepared this AI.

#### **RESEARCH METHODOLOGY**

An AI offers a thorough examination of a variety of sources related to housing, affirmatively furthering fair housing, the fair housing delivery system and housing transactions affecting people who are protected under fair housing law. The following four types of research were utilized in creating this AI:

- 1. Primary the collection and analysis of raw data that did not yet exist;
- 2. Secondary the review of existing data and studies;
- 3. Quantitative statistical analysis of objective, measurable or numerical data; and

as a	City of Baton Rouge
iana	City of Bossier City
	City of Houma/Terrebonne Parish
	City of Kenner
ocal	City and Parish of Lafayette
ll as	City of Lake Charles
	City of Monroe
ig in	City of New Orleans
С, а	City of Shreveport
lysis	City of Slidell
inity	St. Tammany Parish
,	City of Thibodaux
	Jefferson Parish
	Balance of State
elated	l to housing, affirmatively
	ing transactions affecting
	a four two of recorded

Table 1.1 Entitlement Areas in

Louisiana

City of Alexandria

<sup>&</sup>lt;sup>1</sup> Fair Housing Planning Guide. U.S. Department of Housing and Urban Development. March 1996, pg.1-3.

 $<sup>^2</sup>$  St. Tammany Parish became a new entitlement during this process and, consequently, was not included as a separate geographic area. The city of Shreveport elected to have a report on complementary data and updated information, excluding an evaluation of the impediments themselves in the city of Shreveport.

4. *Qualitative* – evaluation of subjective, in-depth insights of people's beliefs, feelings, attitudes, opinions and experiences.

Combining all four types of research provides a rich data set for analyzing impediments to fair housing choice.

Much of the baseline secondary and quantitative data providing a picture of the housing marketplace were drawn from the 2000 census and intercensal estimates. These data included population, personal income, poverty estimates, housing units by tenure, cost burdens and housing conditions. Other data were drawn from records provided by the Bureau of Economic Analysis, the Bureau of Labor Statistics, and a variety of other state and federal statistics depicting the socio-economic context in which consumers make housing choices. The narrative below offers a brief description of the key data sources employed for the 2010 AI.

#### Home Mortgage Disclosure Act Data

The Home Mortgage Disclosure Act (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 the mortgage applicant, along with loan application amounts, household income and the census tract in which the home is located, along with information concerning their actions related to the loan application. For this analysis, HMDA data from 2002 through 2007 were analyzed, with denial rates by race and ethnicity of applicants as one of the key research objectives. Originated loans were further evaluated, with a subset of those loans identified as having characteristics of unusually high interest rates.

## Fair Housing Complaint Data

Fair housing complaint data was also gathered for the AI and was used to gain insight into the type and frequency of housing discrimination occurring in the housing market in the state. HUD provided fair housing complaint data for the years 2000 through 2008 by city and parish throughout the state. This information also included data about the alleged discriminatory action, the basis of the complaint, and the outcome of the housing complaint. The Louisiana Department of Justice provided selected statewide complaint data for the years 1999 through October 2009.

## 2009 Fair Housing Survey

One of the methods HUD recommends for gathering public input about perceived impediments to fair housing is a survey of stakeholders. As such, a survey was utilized to gain feedback from fair housing stakeholders. The purpose of the survey was to gain a more qualitative analysis of the knowledge, experiences, opinions and feelings of stakeholders regarding fair housing, as well as to gauge the stakeholders' understanding of affirmatively furthering fair housing. There were 451 surveys completed statewide.

#### **PUBLIC INVOLVEMENT**

Ten fair housing forums were held in locations throughout Louisiana the week of November 16, 2009 with each forum dedicated to one or two geographic areas. One such forum was held in the city of Baton Rouge on November 17, 2009. The purpose of these meetings was to present preliminary findings of the AI to the public, to afford the public an opportunity to assist in guiding the AI development process, and to give the public time to express their personal perspective, commentary and testimony regarding the AI and affirmatively furthering fair housing. A flyer that advertised the specifics of the meetings was broadly distributed via e-mail and public notification.<sup>3</sup>

A draft report for public review was released on March 1, 2010, which initiated a 30-day public review period. Public presentations of the draft report were made during the week of March 15, 2010, giving the public an additional opportunity to provide input on the draft of the AI and the AI development process.

#### COMMITMENT TO FAIR HOUSING

In accordance with the applicable statutes and regulations governing the Consolidated Plan, the Louisiana Office of Community Development certifies that it will *affirmatively further fair housing*. This means that this agency has conducted an AI, will take appropriate actions to overcome the effects of any impediments identified through this study, and will maintain records reflecting actions in this regard.

<sup>&</sup>lt;sup>3</sup> A copy of that flyer has been included in Appendix D of this document.

# SECTION II. COMMUNITY PROFILE

#### INTRODUCTION

This section presents demographic, economic and housing data collected from: the U.S. Census Bureau, the Bureau of Economic Analysis and the Bureau of Labor Statistics. Collected data include a broad range of socioeconomic characteristics for the area: population, race, ethnicity, disability, poverty, employment and housing trends. These data illustrate the underlying conditions that have shaped housing market behavior and housing choice and highlight potential impediments to fair housing choice within the state of Louisiana.

## **DEMOGRAPHICS**

#### POPULATION

In December of each year the U.S. Census Bureau releases its most current statewide population estimates as of July 1 of that particular year. By August of the following year, the Census Bureau releases estimates of parish and city data for July 1 of the previous year. As such, when this information was collected for this project, the most current statewide population estimates pertained to 2008, while the parish and city data was only available through 2007.

As seen in Table 2.1, on the following page, the population of the state of Louisiana fell by 2.1 percent from 2000 to 2007, from 4,468,976 to 4,373,310. Intercensal population estimates make it possible to examine changes in population from year to year. These data show a 2.7 percent decrease in population from 2005 to 2007, with the population changing from 4,495,672 to 4,373,310.

	Table 2.1     Intercensal Population Estimates											
State of Louisiana 2000 Census SF1 Data												
Entitlements	2000 Census	2001	2002	2003	2004	2005	2006	2007	% Change 00 - 07			
Alexandria	46,342	46,160	45,935	45,757	45,866	45,646	46,126	45,857	-1.0%			
East Baton Rouge	412,854	411,356	410,340	411,344	412,595	411,584	430,614	429,914	4.1%			
Bossier City	56,461	56,459	57,004	57,791	59,331	60,269	61,411	61,801	9.5%			
Houma- Terrebonne	104,503	104,724	104,912	105,157	105,435	106,167	108,043	108,316	3.6%			
Kenner	70,517	69,859	70,207	69,919	69,888	69,419	64,979	65,202	-7.5%			
Lafayette	190,503	190,780	192,700	193,820	195,514	197,212	203,203	204,649	7.4%			
Lake Charles	71,757	71,008	70,696	70,598	70,501	70,076	69,651	70,270	-2.1%			
Monroe	53,107	52,221	52,280	52,110	52,252	51,901	51,671	51,208	-3.6%			
New Orleans	484,674	477,548	472,085	466,767	460,556	453,726	210,198	239,124	-50.7%			
Shreveport	200,145	199,454	198,365	197,796	198,229	198,446	200,706	199,569	-0.3%			
Slidell	25,695	25,783	26,272	26,566	26,557	26,451	27,248	27,185	5.8%			
Thibodaux	14,431	14,387	14,416	14,425	14,382	14,137	14,266	14,158	-1.9%			
Jefferson Parish	455,466	451,981	451,213	451,144	452,116	450,848	422,222	440,339	-3.3%			
Balance of State	2,353,038	2,358,534	2,368,997	2,380,283	2,394,496	2,409,164	2,398,275	2,480,920	5.4%			
Total	4,468,976	4,460,395	4,465,215	4,473,558	4,487,830	4,495,627	4,243,634	4,373,310	-2.1%			

\*Table does not sum to total. Jefferson Parish estimates include the city of Kenner.

Table 2.2 presents the 2000 census population distribution by age. As of 2000, Louisiana's population was comprised mostly of people between the ages of 35 and 54 and those from ages 5 through 19.

Table 2.2   Population by Age   State of Louisiana   2000 Census SF1 Data										
Entitlements	Under 5	5 to 19	20 to 24	25 to 34	35 to 54	55 to 64	64 and Over	Total		
Alexandria	3,394	11,000	2,881	5,475	12,575	4,034	6,983	46,342		
East Baton Rouge	25,384	84,517	37,571	50,768	98,845	27,057	35,962	360,104		
Bossier City	4,544	13,074	4,551	8,314	15,346	4,443	6,189	56,461		
Houma-Terrebonne	7,754	26,233	7,123	14,270	30,148	8,789	10,186	104,503		
Kenner	4,910	16,254	4,677	9,976	22,220	6,170	6,310	70,517		
Lafayette	13,853	45,030	15,534	27,790	56,329	13,845	18,122	190,503		
Lake Charles	4,978	15,900	5,715	8,971	19,543	6,133	10,517	71,757		
Monroe	4,059	14,260	5,380	6,581	12,539	3,478	6,810	53,107		
New Orleans	33,496	112,214	38,932	70,466	135,187	37,726	56,653	484,674		
Shreveport	14,168	46,092	15,037	26,500	54,211	16,367	27,770	200,145		
Slidell	1,714	5,847	1,305	3,200	7,664	2,440	3,525	25,695		
Thibodaux	963	3,503	1,572	1,853	3,436	1,063	2,041	14,431		
Jefferson Parish	30,226	96,904	29,793	64,551	138,025	41,652	54,315	455,466		
Balance of State	172,859	576,063	160,177	312,423	694,389	212,021	277,856	2,405,788		
Total	317,392	1,050,637	325,571	601,162	1,278,237	379,048	516,929	4,468,976		

\*Table does not sum to total. Jefferson Parish estimates include the city of Kenner.

The U.S. Census Bureau also releases intercensal population by age estimates, depicted in Table 2.3. The data show that while the population under 44 years of age decreased from 2000 to 2008, the population 45 years of age and older increased, especially in the 55 to 64 age range.

Table 2.3   Intercensal Population Estimates by Age   State of Louisiana   2000 - 2008 Intercensal Estimates											
Age	2000	2001	2002	2003	2004	2005	2006	2007	2008	% Change 00 - 08	
Under 14	1,002,084	985,612	977,143	972,822	966,406	958,903	873,234	906,712	914,724	-8.7%	
15 to 24	691,516	698,629	702,265	701,973	702,187	693,985	647,967	664,537	664,524	-3.9%	
25 to 44	1,293,128	1,264,041	1,245,061	1,229,512	1,223,431	1,216,889	1,137,555	1,159,582	1,162,463	-10.1%	
45 to 54	586,271	608,080	614,735	623,911	632,780	641,337	616,225	635,265	639,360	9.1%	
55 to 64	379,048	385,699	405,664	421,659	436,850	453,490	449,907	474,797	489,411	29.1%	
65 +	516,929	518,334	520,347	523,681	526,176	531,023	518,746	532,417	540,314	4.5%	
Total	4,468,976	4,460,395	4,465,215	4,473,558	4,487,830	4,495,627	4,243,634	4,373,310	4,410,796	-1.3%	

The U.S. Census Bureau also conducts a nationwide survey, called the American Community Survey (ACS), which provides additional information on characteristics of the population. This data source was used to identify changes in population between 2005 and 2007, which may be attributable to occurrences such as Hurricanes Katrina and Rita. As seen in Table 2.4, ACS data show that all age cohorts 54 years of age and younger experienced a decline in population after the storms, while the population 55 and over increased slightly.<sup>4</sup>

Table 2.4   Population by Age   State of Louisiana   2005 & 2007 American Community Survey Data											
Age 2005 2007 % Change											
Under 5	318,771	296,454	-7.0%								
5 to 19	943,293	918,645	-2.6%								
20 to 24	335,824	335,283	-0.2%								
25 to 34	574,579	556,549	-3.1%								
35 to 54	1,262,091	1,200,654	-4.9%								
55 to 64	456,306	463,438	1.6%								
64 and Over	498,883	522,181	4.7%								
Total	4,389,747	4,293,204	-2.2%								

## **RACIAL COMPOSITION**

Table 2.5 shows the breakdown of the 2000 census population data by race for the state of Louisiana. The largest minority racial group was blacks with over 1,450,000 persons counted in Louisiana, followed by Hispanics with a much smaller population of 107,738 persons. Asians and American Indians were the next largest minority groups but were much fewer at 54,758 and 25,477 people, respectively.

<sup>&</sup>lt;sup>4</sup> The American Community Survey counts population residing in housing units. It overlooks persons residing in institutional and noninstitutional group setting as well as the homeless. These data are only available by parish and for the state in its entirety.

Table 2.5   Population by Race   State of Louisiana   2000 Census SF1 Data											
Entitlements	White	Black	American Indian	Asian	NH/PI	Other	Two or More Races	Total	Hispanic		
Alexandria	19,740	25,371	116	577	20	107	411	46,342	456		
East Baton Rouge	191,647	153,861	683	8,431	114	1,898	3,470	360,104	6,913		
Bossier City	40,335	12,840	322	976	60	813	1,115	56,461	2,232		
Houma- Terrebonne	77,401	18,594	5,533	845	16	568	1,546	104,503	1,631		
Kenner	48,038	15,900	279	2,002	41	2,679	1,578	70,517	9,602		
Lafayette	139,758	45,346	540	2,055	51	983	1,770	190,503	3,320		
Lake Charles	36,042	33,599	167	770	18	338	823	71,757	1,007		
Monroe	19,535	32,462	68	558	16	132	336	53,107	534		
New Orleans	135,956	325,947	991	10,972	109	4,498	6,201	484,674	14,826		
Shreveport	93,394	101,679	619	1,590	66	893	1,904	200,145	3,106		
Slidell	21,360	3,484	127	184	13	160	367	25,695	687		
Thibodaux	9,242	4,872	54	93	3	37	130	14,431	148		
Jefferson Parish	318,002	104,121	2,032	14,065	154	9,239	7,853	455,466	32,418		
Balance of State	1,753,749	589,768	14,225	13,642	600	11,465	22,339	2,405,788	40,460		
Total	2,856,161	1,451,944	25,477	54,758	1,240	31,131	48,265	4,468,976	107,738		

\*Table does not sum to total. Jefferson Parish estimates include the city of Kenner. \*\* NH/PI is Native Hawaiian/Pacific Islander.

Table 2.6 presents the intercensal changes in the racial and ethnic makeup of Louisiana from 2000 through 2008.<sup>5</sup> These data show that the black population declined more than the white population, with decreases of 3.3 percent and 1.2 percent, respectively. All other racial and ethnic groups experienced growth, none more so than the Hispanic population, which expanded by 37.8 percent. The Native Hawaiian/Pacific Island and Asian populations also saw significant growth rates of 28.6 and 14.0 percent, respectively.

Table 2.6   Intercensal Population Estimates by Race and Ethnicity   State of Louisiana   2000 Census SF1 Data and 2001 – 2008 Intercensal Estimates											
Race	2000	2001	2002	2003	2004	2005	2006	2007	2008	Percent Change 00 -07	
White	2,894,356	2,882,698	2,880,961	2,882,092	2,886,704	2,887,089	2,783,449	2,849,792	2,859,940	-1.2%	
Black	1,457,957	1,457,477	1,460,286	1,463,854	1,469,472	1,473,362	1,331,370	1,387,594	1,410,457	-3.3%	
American Indian	26,086	26,453	26,764	27,008	27,442	27,740	26,716	27,801	28,230	8.2%	
Asian	55,959	57,090	58,612	60,123	61,672	62,918	59,047	61,820	63,818	14.0%	
Native Hawaiian/ Pacific Islander	1,435	1,475	1,550	1,612	1,661	1,755	1,677	1,773	1,846	28.6%	
Two or More Races	33,183	35,202	37,042	38,869	40,879	42,763	41,375	44,530	46,505	40.1%	
Total	4,468,976	4,460,395	4,465,215	4,473,558	4,487,830	4,495,627	4,243,634	4,373,310	4,410,796	-1.3%	
Hispanic	107,738	113,849	119,260	123,902	129,274	134,773	130,059	141,617	148,463	37.8%	

<sup>&</sup>lt;sup>5</sup> Intercensal race and ethnicity estimates are only available by parish and for the state in its entirety.

Data from the ACS provide another source of information about recent changes in racial demographics in the state of Louisiana. As seen in Table 2.7, the most significant change between 2005 and 2007 was an increase of over 400 percent in the Native Hawaiian/Pacific Islander population, but in absolute terms this was an increase of less than 1,500 persons. The American Indian population experienced the largest decline, 13.0 percent, and the black and white populations underwent more moderate decreases of 4.8 and 1.4 percent in the population, respectively.

Table 2.7   Population by Race   State of Louisiana   2005 & 2007 American Community Survey Data						
Race	2005	2007	% Change			
White	2,795,263	2,756,277	-1.4%			
Black	1,425,685	1,357,893	-4.8%			
American Indian	24,921	21,683	-13.0%			
Asian	58,392	59,825	2.5%			
Native Hawaiian/Pacific Islander	347	1,803	419.6%			
Other	37,078	40,811	10.1%			
Two or More Races	48,061	54,912	14.3%			
Total	4,389,747	4,293,204	-2.2%			

An analysis of the geographic distribution of racial and ethnic populations was conducted by comparing the average share of a certain population to the share of all census tracts in Louisiana. The computed census tract shares were then plotted on a geographic map to determine if the areas exhibited a disproportionate share. HUD defines a population as having a disproportionate share when a particular portion of that population is more than 10 percentage points higher than the jurisdiction average. As Map 2.1 illustrates, the black population was concentrated mostly in the urban areas of Louisiana.



A similar spatial evaluation of the concentration of the Hispanic population revealed that almost all the census tracts with a disproportionate share of the Hispanic population were located within or near urban areas.



An analysis of the Asian population in Map 2.3 showed that, similar to other minority racial populations, disproportionate shares were present mostly in the urban areas of Louisiana.





#### **DISABILITY STATUS**

Disability is defined by the Census Bureau as a lasting physical, mental or emotional condition that makes it difficult for a person to do activities or impedes them from being able to go outside the home alone or to work.<sup>6</sup> Defined in this fashion, the disabled population comprised 21.8 percent of Louisiana's population in 2000, as seen in Table 2.8.

Table 2.8Disability by AgeState of LouisianaCensus 2000 SF3 Data							
Place	5 to 15	16 to 64	Over 65	Total	Disability Rate		
Alexandria	520	7,559	3,359	11,438	27.4%		
East Baton Rouge	3,749	45,174	14,944	63,867	19.4%		
Bossier City	525	6,311	2,477	9,313	19.4%		
Houma-Terrebonne	1,780	15,937	5,329	23,046	24.1%		
Kenner	882	9,374	2,782	13,038	20.0%		
Lafayette	2,213	21,787	7,575	31,575	18.1%		
Lake Charles	797	9,604	4,377	14,778	22.9%		
Monroe	482	7,291	2,863	10,636	22.3%		
New Orleans	6,251	68,775	27,096	102,122	23.2%		
Shreveport	2,188	26,592	11,755	40,535	22.3%		
Slidell	237	3,169	1,484	4,890	20.9%		
Thibodaux	169	1,679	820	2,668	20.5%		
Jefferson Parish	5,027	59,658	23,847	88,532	21.0%		
Balance of State	. 28,844	318,247	129,556	476,647	22.0%		
Total	52,782	591,783	235,482	880,047	21.8%		

\*Table does not sum to total. Jefferson Parish estimates include the city of Kenner.

As shown in Table 2.9, the size of the disabled population declined by 3.4 percent from 2005 through 2007. Among different age groups, the number of persons with disabilities in the 5 to 15 age cohort saw the largest change, dropping by 14.3 percent.

Table 2.9Disability by AgeState of Louisiana2005 & 2007 American Community Survey Data							
Age	2005	2007	% Change				
5 to 15	61,296	52,518	-14.3%				
16 to 64	443,364	423,679	-4.4%				
Over 65	232,633	236,351	1.6%				
Total	737,293	712,548	-3.4%				
Dis. Rate	18.2%	18.3%	0.1%				

<sup>&</sup>lt;sup>6</sup> The data on disability status were derived from answers to long-form questionnaire items 16 and 17 for the 1-in-6 sample. Item 16 asked about the existence of the following long-lasting conditions: (a) blindness, deafness, or a severe vision or hearing impairment, (sensory disability) and (b) a condition that substantially limits one or more basic physical activities such as walking, climbing stairs, reaching, lifting, or carrying (physical disability). Item 16 was asked of a sample of the population five years old and over. Item 17 asked if the individual had a physical, mental or emotional condition lasting 6 months or more that made it difficult to perform certain activities. The four activity categories were: (a) learning, remembering, or concentrating (mental disability); (b) dressing, bathing, or getting around inside the home (self-care disability); (c) going outside the home alone to shop or visit a doctor's office (going outside the home disability); and (d) working at a job or business (employment disability). Categories 17a and 17b were asked of a sample of the population five years old and over. For data products which use the items individually, the following terms are used: sensory disability for 16a, physical disability for 16b, mental disability for 17a, self-care disability for 17b, going outside the home disability if any of the following three conditions was true: (1) they were five years old and over and had a response of "yes" to a sensory, physical, mental or self-care disability; (2) they were 16 years old and over and had a response of "yes" to going outside the home disability; or (3) they were 16 to 64 years old and had a response of "yes" to employment disability; or (3) they were 16 to 64 years old and had a response of "yes" to employment disability; or (3) they were 16 to 64 years old and had a response of "yes" to employment disability.

Map 2.4 shows the distribution of the disabled population in the state of Louisiana according to the 2000 census and reveals that the majority of the disproportionate shares of disabled persons were in or near urban areas.


### LABOR FORCE AND EMPLOYMENT

According to the Bureau of Labor Statistics (BLS), the labor force is defined as people working or looking for work. As depicted in Table 2.10, the labor force increased by a little over 47,000 persons from 2000 to 2008, rising from 2,031,292 to 2,078,935. The number of unemployed persons decreased during the same time period from 100,630 to 95,715.

	Table 2.10     Labor Force Statistics     State of Louisiana										
	Bureau of Labor Statistics										
Year	Louisiana U. Labor Employment Unemployment Unemployment Unemployment Rate Ra										
1990	1,877,388	1,767,306	110,082	5.9	5.6						
1991	1,922,022	1,789,796	132,226	6.9	6.8						
1992	1,940,080	1,787,541	152,539	7.9	7.5						
1993	1,878,274	1,738,570	139,704	7.4	6.9						
1994	1,931,434	1,785,654	145,780	7.5	6.1						
1995	1,950,958	1,820,359	130,599	6.7	5.6						
1996	1,980,714	1,855,474	125,240	6.3	5.4						
1997	2,004,792	1,890,102	114,690	5.7	4.9						
1998	2,027,265	1,918,907	108,358	5.3	4.5						
1999	2,022,162	1,926,732	95,430	4.7	4.2						
2000	2,031,292	1,930,662	100,630	5.0	4						
2001	2,030,887	1,922,110	108,777	5.4	4.7						
2002	2,010,850	1,892,636	118,214	5.9	5.8						
2003	2,024,274	1,898,829	125,445	6.2	6						
2004	2,040,959	1,928,464	112,495	5.5	5.5						
2005	2,076,498	1,937,009	139,489	6.7	5.1						
2006	1,985,472	1,907,465	78,007	3.9	4.6						
2007	2,025,777	1,949,401	76,376	3.8	4.6						
2008	2,078,935	1,983,220	95,715	4.6	5.8						

When the number of employed persons grows more slowly than the size of the labor force, unemployment rises. Monthly unemployment rates from the BLS, presented in Diagram 2.1, show the unemployment rate spiked in 2005 after Hurricanes Katrina and Rita, fell to a low of almost 3.0 percent in 2006, and then steadily rose again to 7.8 percent in August 2009. The state rate in August 2009 was still below the national unemployment rate of 9.7 percent.



The Bureau of Economic Analysis (BEA) provides an alternate view of employment: a count of both full- and part-time jobs. Also, a person working more than one job can be counted more than once. Table 2.11 shows that from 2000 to 2007 the number of jobs increased by almost 113,000, from 2,404,237 in 2000 to 2,517,085 in 2007. Average earnings per job also increased during the same time period, from \$38,380 in 2000 to \$44,038 in 2007. Another perspective of the economy involves comparing the total of all forms of income: wages earned, transfer payments and property income, such as dividends, interest and rents. When these data are added together and divided by population, per capita income is the result. Table 2.11 also shows that per capita income rose to \$35,844 in 2007 from \$28,242 in 2000.

	Table 2.11   Total Employment and Real Personal Income   State of Louisiana State of Louisiana   BEA Data 2000 - 2007, 2008 Dollars Average   1,000s of 2008 Dollars Data													
Year	ear Social Residents Dividends, Transfer Personal Capita Emp Contributions Adjustments Rents Ren													
2000	92,275,315	9,029,982	-318,091	21,657,167	21,627,745	126,212,153	28,242	2,404,237	38,380					
2001	96,060,291	9,373,486	-166,275	20,825,717	24,399,351	131,745,598	29,537	2,409,298	39,870					
2002	97,136,677	9,528,952	-146,597	19,422,790	25,522,026	132,405,944	29,652	2,411,665	40,278					
2003	99,335,084	9,635,172	-190,909	18,277,565	25,254,237	133,040,805	29,739	2,435,683	40,783					
2004	101,882,077	9,732,933	-185,643	18,033,800	26,761,532	136,758,834	30,474	2,462,439	41,374					
2005	96,864,681	9,795,886	26,684	2,445,683	39,607									
2006	106,073,315	10,610,166	-163,910	23,524,737	27,288,504	146,112,480	34,431	2,434,730	43,567					
2007	110,846,253	11,152,099	-157,857	30,275,173	26,947,900	156,759,369	35,844	2,517,085	44,038					

Diagram 2.2 shows that average earnings per job in the state of Louisiana steadily increased, rising to a high of \$44,038. Still, this figure was below the earnings seen nationwide as of 2007.



### HOUSEHOLD INCOME

At the time that the 2000 census was taken, households with incomes under \$15,000 comprised the largest portion of the populace, with 400,016 households out of 1,657,107 in that category, as seen in Table 2.12. The majority of the remaining households fell into an income range of \$25,000 to \$75,000.

Table 2.12   Households by Income   State of Louisiana   Census 2000 SF3 Data												
Entitlements	Under 15,000	15,000 - 19,999	20,000 - 24,999	25,000 - 34,999	35,000 - 49,999	50,000 - 74,999	75,000 - 99,999	100,000 and above	Total			
Alexandria	5,634	1,408	1,543	2,409	2,512	2,122	862	1,332	17,822			
East Baton Rouge	29,756	10,288	9,607	17,456	20,216	22,608	12,513	15,542	137,986			
Bossier City	3,906	1,552	1,743	2,948	4,054	3,794	1,816	1,354	21,167			
Houma-Terrebonne	7,829	2,763	2,535	4,752	6,105	6,710	2,968	2,355	36,017			
Kenner	3,992	1,712	1,708	3,784	4,344	5,079	2,356	2,663	25,638			
Lafayette	14,990	4,962	5,177	9,588	11,551	13,023	6,255	6,866	72,412			
Lake Charles	7,451	2,327	2,085	3,733	3,994	4,133	2,047	2,195	27,965			
Monroe	6,615	1,511	1,317	2,438	2,505	2,336	1,207	1,518	19,447			
New Orleans	57,608	15,629	14,131	25,460	26,399	23,724	10,802	14,612	188,365			
Shreveport	19,850	6,708	6,228	11,182	12,005	11,502	5,422	5,838	78,735			
Slidell	1,485	539	505	1,282	1,678	2,006	994	1,015	9,504			
Thibodaux	1,782	411	438	787	725	659	355	382	5,539			
Jefferson Parish	30,234	12,163	12,699	25,357	30,474	33,426	15,893	16,178	176,424			
Balance of State	212,876	66,012	64,207	116,017	138,404	148,507	65,618	54,083	865,724			
Total	400,016	126,273	122,215	223,409	260,622	274,550	126,752	123,270	1,657,107			

\*Table does not sum to total. Jefferson Parish estimates include the city of Kenner.

Table 2.13 presents data from the ACS on household income from 2005 to 2007 for Louisiana. The largest increase was in households generating more than \$100,000 income. with 22.0 percent more in households in 2007. Significant decreases of slightly more than 17.0 percent were seen in the number of households earning less than \$19,999 in income. All other income groups declined moderately, except for the number of households with income between \$75,000 and \$99,999, which grew by 6.0 percent.

Table 2.13   Households by Income   State of Louisiana   2005 & 2007 American Community Survey Data								
Income	2005	2007	% Change					
Under 15,000	366,227	303,099	-17.2%					
15,000 - 19,999	127,322	105,576	-17.1%					
20,000 - 24,999	111,538	105,202	-5.7%					
25,000 - 34,999	198,173	185,449	-6.4%					
35,000 - 49,999	245,604	232,900	-5.2%					
50,000 - 74,999	280,195	266,542	-4.9%					
75,000 - 99,999	159,584	169,112	6.0%					
100,000 and above 187,956 229,231 22.0%								
Total	1,676,599	1,597,111	-4.7%					

### 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 their 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. Poverty is not defined for people in military barracks, institutional group quarters, or for unrelated individuals under age 15, including foster children. These groups are considered to be neither poor nor nonpoor. Table 2.14 shows that the poverty rate in 2000 was 19.6 percent, and there were 851,113 total persons living in poverty in the state.

			e 2.14								
Poverty Rate by Age State of Louisiana											
Census 2000 SF3 Data											
Entitlements	5 and Below	6 to 18	18 to 64	65 and Older	Total	Poverty Rate					
Alexandria	1,900	3,020	6,314	1,173	12,407	27.4%					
East Baton Rouge	8,161	14,335	40,000	4,134	66,630	19.2%					
Bossier City	1,351	2,006	4,071	634	8,062	14.8%					
Houma-Terrebonne	2,465	5,310	10,142	1,690	19,607	19.1%					
Kenner	1,282	2,286	5,234	700	9,502	13.6%					
Lafayette	3,302	6,229	17,046	2,639	29,216	15.7%					
Lake Charles	1,885	2,964	7,215	1,323	13,387	19.6%					
Monroe	2,406	4,549	7,751	1,333	16,039	32.3%					
New Orleans	16,884	34,823	68,721	10,468	130,896	27.9%					
Shreveport	6,137	11,759	22,369	4,240	44,505	22.8%					
Slidell	407	775	1,526	258	2,966	11.8%					
Thibodaux	438	779	1,736	351	3,304	25.1%					
Jefferson Parish	8,008	15,016	33,405	5,179	61,608	13.7%					
Balance of State	55,451	109,310	229,454	48,271	442,486	19.0%					
Total	108,795	210,875	449,750	81,693	851,113	19.6%					

\*Table does not sum to total. Jefferson Parish estimates include the city of Kenner.

As shown in Table 2.15, between 2005 and 2007 the number of persons whose income fell below the poverty line declined from 864,277 individuals in 2005 to 775,425 individuals in 2007, a 10.3 percent reduction.

Equally important, the poverty rate was not uniform throughout the state of Louisiana, as some areas had much higher concentrations of poverty than others. A computation was used to measure the

Table 2.15   Poverty by Age   State of Louisiana   2005 & 2007 American Community Survey Data									
Age	2005	2007	% Change						
5 and Below	5 and Below 98,691 86,648 -12.2%								
6 to 18	220,404	196,702	-10.8%						
19 to 64	471,360	425,785	-9.7%						
65 and Older	73,822	66,290	-10.2%						
Total 864,277 775,425 -10.3%									
Poverty Rate	19.8%	18.6%	-5.8%						

concentration of poverty. Again, an area with a disproportionate share of poverty would have a poverty rate of more than 10 percentage points above the jurisdiction average. As illustrated by Map 2.5, disproportionate shares of poverty were well distributed through all areas of the state, but extreme concentrations of poverty were observed mostly in urban areas.

Map 2.5



# HOUSING

Table 2.16 presents data on the type of housing units counted in the 2000 census. The vast majority of housing units in the state of Louisiana were single-family units, representing 1,255,030 units out of 1,847,181 total units. There were also a fair number of mobile homes and apartments, with 240,944 and 188,062 units, respectively.

	Table 2.16   Housing Units by Unit Type   State of Louisiana   Census 2000 SF3 Data										
Unit Type	Single- Family Unit	Duplex	Tri- or Four-Plex	Apartments	Mobile Homes	Boat, RV, Van, Etc.	Total				
Alexandria	14,620	1,478	869	2,263	643	21	19,894				
East Baton Rouge	99,154	3,662	11,024	32,176	3,410	56	149,482				
Bossier City	16,143	794	874	3,798	1,268	16	22,893				
Houma-Terrebonne	28,338	869	988	2,556	7,025	152	39,928				
Kenner	17,159	1,376	2,697	5,734	400	12	27,378				
Lafayette	51,158	1,562	4,544	11,399	9,379	80	78,122				
Lake Charles	22,813	1,672	1,479	4,622	673	52	31,311				
Monroe	14,769	1,172	1,779	3,143	456	0	21,319				
New Orleans	122,310	29,430	20,704	41,804	738	105	215,091				
Shreveport	62,083	2,341	5,123	14,891	2,431	52	86,921				
Slidell	8,281	343	430	635	395	19	10,103				
Thibodaux	4,126	525	406	766	234	0	6,057				
Jefferson Parish	127,174	8,080	12,941	36,166	3,491	55	187,907				
Balance of State	684,061	22,564	22,363	33,843	210,801	4,521	978,153				
Total	1,255,030	74,492	83,524	188,062	240,944	5,129	1,847,181				

\*Table does not sum to total. Jefferson Parish estimates include the city of Kenner.

ACS data on housing unit types are presented in Table 2.17. Overall, the number of housing units from 2005 through 2007 decreased by 4.2 percent, but this increase was not uniform. Mobile home units increased by 7.3 percent and there was an extremely large percentage increase of 166.9 percent in the number of boat, RV, and van units, but this was a small absolute change because of the small number of units present in 2005. The number of duplex, multiplex and apartment units all declined a similar amount, between 7.0 and 10.0 percent, and single-family units saw a more moderate decrease of 5.2 percent.<sup>7</sup>

<sup>&</sup>lt;sup>7</sup> Data are estimates of the actual figures that would have been obtained by interviewing the entire population using the same methodology. Sampling error in data will arise due to the use of probability sampling and results and should be treated as statistical estimates. For further discussion on sampling error and information regarding the calculation of confidence intervals see: http://www.census.gov/acs/www/UseData/Accuracy/Accuracy1.htm

Table 2.17   Housing Units by Unit Type   State of Louisiana   2005 & 2007 American Community Survey Data								
Unit Type	2005	2007	% Change					
Single-Family Unit	1,340,180	1,270,413	-5.2%					
Duplex	72,424	65,144	-10.1%					
Tri- or Four-Plex	83,589	76,092	-9.0%					
Apartments	201,521	185,048	-8.2%					
Mobile Homes	241,789	259,498	7.3%					
Boat, RV, Van, Etc. 896 2,391 166.9%								
Total	1,940,399	1,858,586	-4.2%					

Table 2.18 presents a count of the housing stock at the time of the 2000 census, including both occupied and vacant units. There were 1,124,995 owner-occupied units compared to 531,058 renter-occupied units, suggesting that while the majority of the units were owner-occupied, about 67.9 percent, there was still a large contingency of renters.

	Table A.10   Housing Units by Tenure   State of Louisiana   Census 2000 SF3 Data										
Unit Tenure	Owner Benter Occupied Vacant Tot										
Alexandria	10,181	7,675	17,856	2,038	19,894						
East Baton Rouge	81,268	56,542	137,810	11,672	149,482						
Bossier City	12,726	8,447	21,173	1,720	22,893						
Houma-Terrebonne	27,193	8,804	35,997	3,931	39,928						
Kenner	15,594	10,058	25,652	1,726	27,378						
Lafayette	47,803	24,569	72,372	5,750	78,122						
Lake Charles	16,112	11,775	27,887	3,424	31,311						
Monroe	9,571	9,861	19,432	1,887	21,319						
New Orleans	87,535	100,716	188,251	26,840	215,091						
Shreveport	46,597	32,165	78,762	8,159	86,921						
Slidell	7,237	2,278	9,515	588	10,103						
Thibodaux	2,920	2,593	5,513	544	6,057						
Jefferson Parish	112,534	63,700	176,234	11,673	187,907						
Balance of State	663,318	201,933	865,251	112,902	978,153						
Total	1,124,995	531,058	1,656,053	191,128	1,847,181						

\*Table does not sum to total. Jefferson Parish estimates include the city of Kenner.

ACS data regarding a comparison of tenure from 2005 and 2007 are displayed in Table 2.19. This table shows that both the number of renter-occupied units and owner-occupied units decreased by similar amounts, 4.6 and 5.1 percent, respectively. During the same time period the number of vacant housing units declined slightly by 0.9 percent.

Table 2.19Housing Units by TenureState of Louisiana2005 & 2007 American Community Survey Data								
Unit Tenure 2005 2007 % Change								
Occupied Housing Units	1,676,599	1,597,111	-4.7%					
Owner-Occupied	1,136,873	1,085,054	-4.6%					
Renter-Occupied	539,726	512,057	-5.1%					
Vacant Housing Units	Vacant Housing Units 263,800 261,475 -0.9%							
Total Housing Units   1,940,399   1,858,586   -4.2%								

As shown in Table 2.20, the hurricanes also spurred home construction, with nearly 62,000 new units built in the state of Louisiana between 2005 and 2007.

Table 2.20Housing Units by Year BuiltState of Louisiana2005 & 2007 American Community Survey Data									
Year Built	2005	2007	% Change						
1939 or earlier	155,884	132,526	-15.0%						
1940 to 1949	131,705	104,584	-20.6%						
1950 to 1959	226,282	198,699	-12.2%						
1960 to 1969	289,950	264,760	-8.7%						
1970 to 1979	408,654	384,098	-6.0%						
1980 to 1989	329,102	308,497	-6.3%						
1990 to 1999	257,446	244,715	-4.9%						
2000 to 2004	132,337	149,841	13.2%						
2005 or later	9,039	70,866	684.0%						
Total	Total 1,940,399 1,858,586 -4.2%								
Median	1974	1976	0.1%						

## VACANT HOUSING UNITS

Table 2.21 provides data on the disposition of vacant housing units. These data show that 54,341 of the 191,128 vacant units were for rent, for a vacancy rate of 9.3 percent. A number of vacant units, 45,412, were vacant because they were for seasonal, recreational or occasional use.

	Table 2.21   Disposition of Vacant Housing Units   State of Louisiana   Census 2000 SF3 Data										
Entitlements	For Rent	For Sale	Rented or Sold, Not Occupied	For Seasonal, Recreational, or Occasional Use	For Migrant Workers	Other Vacant	Total				
Alexandria	998	247	221	63	0	509	2,038				
East Baton Rouge	6,213	1,716	1,080	631	18	2,014	11,672				
Bossier City	950	231	110	150	13	266	1,720				
Houma-Terrebonne	873	401	340	1,416	21	880	3,931				
Kenner	1,194	175	117	107	0	133	1,726				
Lafayette	2,948	945	485	514	15	843	5,750				
Lake Charles	1,904	444	265	237	13	561	3,424				
Monroe	788	291	175	165	0	468	1,887				
New Orleans	8,782	2,459	4,010	3,136	31	8,422	26,840				
Shreveport	3,926	1,091	972	589	0	1,581	8,159				
Slidell	196	173	73	97	0	49	588				
Thibodaux	237	33	92	53	0	129	544				
Jefferson Parish	5,278	1,593	912	2,018	5	1,867	11,673				
Balance of State	21,248	13,867	14,386	36,343	520	26,538	112,902				
Total	54,341	23,491	23,121	45,412	636	44,127	191,128				

\*Table does not sum to total. Jefferson Parish estimates include the city of Kenner.

Data from the ACS about the disposition of vacant housing units between 2005 and 2007 are presented in Table 2.22. These data show a large decrease of 27.5 percent in the number of vacant units that were rented or sold but not occupied. The number of vacant units for rent also fell by 14.7 percent, while the number of vacant units for sale increased by 7.9 percent.

Table 0.00									
Table 2.22									
Disposition of Vacant H	lousing U	Inits							
State of Louisiana									
2005 & 2007 American Community Survey Data									
Disposition 2005 2007 % Change									
For Rent	47,237	40,282	-14.7%						
For Sale	19,242	20,764	7.9%						
Rented or Sold, Not Occupied	21,937	15,906	-27.5%						
For Seasonal, Recreational, or Occasional Use	40,856	50,680	24.0%						
For Migrant Workers	113	1,475	1205.3%						
Other Vacant	134,415	132,368	-1.5%						
Total	263,800	261,475	-0.9%						

### HOUSING PROBLEMS

While the 2000 census does not report significant details regarding the physical condition of housing units, information regarding overcrowding, incomplete plumbing or kitchen facilities, and cost burden is available.<sup>8</sup>

Overcrowding is defined as having from 1.1 to 1.5 people per room in a residence, with severe overcrowding defined as having more than 1.5 people per room. Table 2.23 shows that overall, 3.5 percent of households were overcrowded and 1.8 percent were severely overcrowded. Renters represented the larger share of overcrowding, with 5.4 percent of renters experiencing overcrowding and 3.6 percent of renters experiencing severe overcrowding versus 2.5 percent of owners experiencing overcrowding.

<sup>&</sup>lt;sup>8</sup> These data are derived from the one in six sample, also called Summary File 3 or SF3 data and consist of 813 detailed tables of Census 2000 social, economic and housing characteristics compiled from a sample of approximately 19 million housing units (about 1 in 6 households) that received the Census 2000 long-form questionnaire. Source: http://www.census.gov/Press-Release/www/2002/sumfile3.html. These sample data include sampling error and may not sum precisely to the 100 percent sample typically presented in the 2000 census.

Table 2.23   Overcrowding and Severe Overcrowding   State of Louisiana   Census 2000 SF3 Data										
State of   No   Severe     Louisiana   Overcrowding   Overcrowding										
Owner										
Households	1,086,236	28,272	10,487	1,124,995						
Percent	96.6%	2.5%	0.9%	100.0%						
		Renter								
Households	483,391	29,010	18,657	531,058						
Percent	91.0%	5.4%	3.6%	100.0%						
	Total									
Households	1,569,627	57,282	29,144	1,656,053						
Percent	94.8%	3.5%	1.8%	100.0%						

Table 2.24 shows the number of overcrowded and severely overcrowded housing units in 2005 and 2007 in the state of Louisiana according to ACS data. The number of owner households with overcrowding increased slightly from 1.7 percent in 2005 to 1.8 percent in 2007. The number of renter households with overcrowding increased more, moving from 3.7 percent to 4.5 percent over this same time period.

Table 2.24   Overcrowding and Severe Overcrowding   State of Louisiana   2005 & 2007 American Community Survey Data											
	No	Overcrowdi	ng	0	vercrowd	ing	Sever	e Overcro	owding	Тс	otal
State	2005	2007	% Change	2005	2007	% Change	2005	2007	% Change	2005	2007
	Owner										
Households	1,113,389	1,065,575	-4.3%	19,737	19,192	-2.8%	3,747	287	-92.3%	1,136,873	1,085,054
Percent	97.9%	98.2%	0.3%	1.7%	1.8%	0.0%	0.3%	0.0%	-0.3%	100.0%	100.0%
					Ren	ter					
Households	514,619	487,718	-5.2%	20,121	23,161	15.1%	4,986	1,178	-76.4%	539,726	512,057
Percent	95.3%	95.2%	-0.1%	3.7%	4.5%	0.8%	0.9%	0.2%	-0.7%	100.0%	100.0%
				-	Tot	al				-	
Households	1,628,008	1,553,293	-4.6%	39,858	42,353	6.3%	8,733	1,465	-83.2%	1,676,599	1,597,111
Percent	97.1%	97.3%	0.2%	2.4%	2.7%	0.3%	0.5%	0.1%	-0.4%	100.0%	100.0%

Incomplete plumbing and kitchen facilities are another indicator 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, Table 2.25 shows that 31,797 housing units did not have complete kitchen facilities and 26,327 did not have complete plumbing facilities.

Table 2.25     Housing Units with Incomplete Kitchen or Plumbing Facilities     State of Louisiana     Census 2000 SF3 Data										
Entitlements	Lacking Complete Kitchen Facilities	Lacking Complete Plumbing Facilities	Total	Percent Missing Complete Facilities						
Alexandria	374	238	612	3.1%						
East Baton Rouge	1,556	1,155	2,711	1.8%						
Bossier City	121	92	213	0.9%						
Houma-Terrebonne	851	717	1,568	3.9%						
Kenner	163	184	347	1.3%						
Lafayette	718	445	1,163	1.5%						
Lake Charles	386	271	657	2.1%						
Monroe	331	211	542	2.5%						
New Orleans	6,393	4,762	11,155	5.2%						
Shreveport	1,591	909	2,500	2.9%						
Slidell	59	31	90	0.9%						
Thibodaux	36	30	66	1.1%						
Jefferson Parish	1,225	1,193	2,418	1.3%						
Balance of State	18,156	16,273	34,429	3.5%						
Total	31,797	26,327	58,124	3.1%						

\*Table does not sum to total. Jefferson Parish estimates include the city of Kenner.

As shown in Table 2.26, the number of housing units with incomplete kitchen or plumbing facilities in the state of Louisiana was fairly high in 2005 but were much less in 2007, with a 31.9 percent drop in the number of units with incomplete kitchen facilities and a 12.4 percent decline in the number of units with incomplete plumbing facilities.

Table 2.26Housing Units with Incomplete Plumbing or Kitchen FacilitiesState of Louisiana2005 & 2007 American Community Survey Data							
Facilities	2005	2007	% Change				
Lacking Complete Kitchen Facilities 13,480 9,180 -31.9%							
Lacking Complete Plumbing Facilities	9,859	8,634	-12.4%				

The third type of consideration pertaining to housing problems reported in the 2000 census is cost burden. Cost burden is defined as gross housing costs that range from 30 to 50 percent of gross household income; severe cost burden is defined as gross housing costs that exceed 50 percent 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 and selected electricity and natural gas charges. Table 2.27 shows that 13.4 percent of all households in the State of Louisiana had a cost burden and 11.8 percent had a severe cost burden. When broken down by tenure renters have an even higher cost burden, with 17.3 percent of renters having a cost burden versus 14.6 percent of owners with mortgages.

Table 2.27   Percent of Income Spent on Housing   State of Louisiana   Census 2000 SF3 Data										
State of Louisiana	Less than 30.0%	31% - 50%	Above 50%	Not Computed	Total					
	Renter									
Households	265,633	90,949	98,447	70,693	525,722					
Percent	50.5%	17.3%	18.7%	13.5%	100.0%					
		Owner With	Mortgage							
Households	386,404	75,229	50,180	4,847	516,660					
Percent	74.8%	14.6%	9.7%	0.9%	100.0%					
		Owner Witho	ut Mortgage							
Households	302,359	20,501	15,579	9,711	348,150					
Percent	86.8%	5.9%	4.5%	2.8%	100.0%					
		Tot	al							
Households	954,396	186,679	164,206	85,251	1,390,532					
Percent	68.6%	13.4%	11.8%	6.2%	100.0%					

For severe cost burden, 18.7 percent of renters were in this condition along with 9.7 percent of owners with mortgages.

Table 2.28 shows the same concept but with data reported by the ACS for 2005 and 2007. Overall, the number of households with a cost burden rose slightly from 28.5 percent to 28.6 percent. The number of owners with a mortgage who experienced a cost burden grew from 28.5 percent to 29.6 percent while the number of renters with a cost burden decreased from 42.9 percent to 42.4 percent.

				Table 2	2.28						
			Percent	of Income S	pent on l	Housing					
	State of Louisiana										
2005 & 2007 American Community Survey Data											
Percentage	•	Owner With N	lortgage	Owner Wi Mortga		Rente	r	Tota	l		
•		Households	Percent	Households	Percent	Households	Percent	Households	Percent		
Less	2005	469,982	71.0%	410,414	86.5%	233,231	43.2%	1,113,627	66.4%		
than	2007	432,478	69.9%	404,716	86.9%	209,716	41.0%	1,046,910	65.6%		
30.0%	% Change	-8.0%	-1.1%	-1.4%	0.4%	-10.1%	-2.3%	-6.0%	-0.9%		
	2005	188,536	28.5%	57,973	12.2%	231,333	42.9%	477,842	28.5%		
30.1 % or More	2007	183,511	29.6%	55,626	11.9%	216,881	42.4%	456,018	28.6%		
	% Change	-2.7%	1.2%	-4.0%	-0.3%	-6.2%	-0.5%	-4.6%	0.1%		
	2005	3,621	0.5%	6,347	1.3%	75,162	13.9%	85,130	5.1%		
Not Computed	2007	3,078	0.5%	5,645	1.2%	85,460	16.7%	94,183	5.9%		
Computou	% Change	-15.0%	0.0%	-11.1%	-0.1%	13.7%	2.8%	10.6%	0.8%		
	2005	662,139	100.0%	474,734	100.0%	539,726	100.0%	1,676,599	100.0%		
Total	2007	619,067	100.0%	465,987	100.0%	512,057	100.0%	1,597,111	100.0%		
	% Change	-6.5%		-1.8%		-5.1%	0.0%	-4.7%			

Households experiencing a severe cost burden are at risk. Such renters with just one financial setback may have to choose between rent and food or rent and healthcare for their family. Similarly, such homeowners with a mortgage and one unforeseen financial

issue, such as temporary illness, divorce or the loss of employment may be forced to face foreclosure or bankruptcy. Both face the prospect of homelessness. 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 home, contributing to dilapidation and blight. These situations should be of concern to policy makers and program managers.

# SUMMARY

## DEMOGRAPHICS

The population in the state of Louisiana declined slightly from 2000 to 2007 by 2.1 percent, resulting in a net loss of 95,666 inhabitants. The population of older age cohorts experienced a large amount of growth in the same period, especially in the 55 to 64 age cohort, while the number of persons aged 44 years and younger decreased. Intercensal estimates showed negative population growth rates for all age cohorts 54 years and younger and positive population growth for individuals aged 55 years or older.

In 2000, blacks comprised the largest minority racial group with 1,451,944 people or 32.4 percent of the population. The urban areas of the state tended to have the highest concentration of the black population, with some census tracts showing a 100.0 percent black population in 2000. Both blacks and whites experienced moderate declines in their size from 2000 to 2008, while all other racial groups grew in size, with the Hispanic population expanding most rapidly. From 2005 to 2007 the growth rates for blacks, whites and American Indians were negative, with the black population decreasing twice as much as the white population.

Louisiana's population had a disability rate of 21.8 percent in 2000, and the majority of disproportionate shares of disabled populations were located in the urban areas of Louisiana.

## **ECONOMICS**

The labor force, defined as people working or looking for work, grew from 1,877,388 to 2,078,935 from 1990 to 2008, a gain of 10.7 percent. Unemployment fell by more than 14,000 individuals during the same time period, resulting in the unemployment rate changing from 5.9 percent in 1990 to 4.6 percent in 2008.

In terms of earnings and income, average real earnings per job increased by just under \$6,000 from 2000 to 2007, from \$38,380 to \$44,038. Another measure, per capita income, also increased in the same time period from \$28,242 in 2000 to \$35,844 in 2007. The poverty rate was 19.6 percent in 2000 with just under 320,000 inhabitants under the age of 18 experiencing poverty. Disproportionate shares of poverty were well distributed through all areas of the state, but extreme concentrations of poverty were observed mostly in urban areas.

# HOUSING

Of the housing stock in Louisiana in 2000, 1,255,030 units were single-family units, 74,492 units were duplexes, 83,524 units were tri- or four-plexes, 188,062 units were apartments, 240,944 units were mobile homes, and 5,129 units were boats, RVs, or vans. Of those total units, 1,124,995 were owner-occupied and 531,058 were renter-occupied, for a home ownership rate of 67.9 percent. More than 191,000 units were vacant, and, of those, 54,341 were for rent and 23,491 were for sale. Between 2005 and 2007 there was a decrease in single-family, apartment, duplex, and multiplex units while the number of mobile homes and boat, RV, and van units increased. The number of renter-occupied and owner-occupied units decreased and there were slightly fewer vacant housing units.

Louisiana had a small number of households, 57,282, that experienced overcrowding in 2000. Those households that experienced severe overcrowding were even fewer at 29,144, or 1.8 percent of all households. Renters tended to have overcrowded and severely overcrowded households more often than homeowners. Between 2005 and 2007 there was a slight increase in the number of owner-occupied households with overcrowding, from 1.7 percent in 2005 to 1.8 percent in 2007, while renter-occupied households with overcrowding saw a larger increase, moving from 3.7 percent in 2005 to 4.5 percent in 2007. In 2000, a combined 36.0 percent of renters had a cost burden or a severe cost burden as opposed to 24.3 percent of homeowners with mortgages with cost burdens or severe cost burdens. From 2005 to 2007, the percentage of owners with mortgages with a cost burden increased from 28.5 percent to 29.6 percent, while the number of renters with a cost burden decreased slightly from 42.9 percent to 42.4 percent.

# SECTION III. LENDING PRACTICES

Since the 1970s, the federal government has enacted several laws aimed at promoting fair lending practices in the banking and financial services industries. Although the record is improving, discriminatory practices have not been entirely eliminated. 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 or 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; or selling or renting a dwelling.

The Equal Credit Opportunity Act was passed in 1974 to prohibit discrimination in lending based on race, color, religion, national origin, sex, marital status, age, receipt of public assistance or the exercise of any right under the Consumer Credit Protection Act.<sup>9</sup>

The Community Reinvestment Act was enacted in 1977 to require each federal financial supervisory agency to encourage financial institutions to help meet the credit needs of their entire community, including low- and moderate-income neighborhoods within those communities.

Under the Home Mortgage Disclosure Act (HMDA), enacted in 1975 and later amended, financial institutions are required to publicly disclose the race, sex and income of mortgage applicants and borrowers by census tract. Analysis presented herein is from the HMDA data system.<sup>10</sup>

# HOME MORTGAGE DISCLOSURE ACT DATA ANALYSIS

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

Reporting criteria for depository institutions are as follows:

- 1. The institution must be a bank, credit union or savings association.
- 2. The total assets must exceed the coverage threshold.<sup>11</sup>
- 3. The institution must have had a home or branch office in a metropolitan statistical area (MSA).

<sup>&</sup>lt;sup>9</sup> Closing the Gap: A Guide to Equal Opportunity Lending, The Federal Reserve Bank of Boston, April 1993.

<sup>&</sup>lt;sup>10</sup> HMDA data are considered "raw" because they contain some data entry errors and incomplete loan applications.

<sup>&</sup>lt;sup>11</sup> 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.

- 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.
- 6. The mortgage loan must have been insured, guaranteed or supplemented by a federal agency or intended for sale to Fannie Mae or Freddie Mac.

For other institutions, including non-depository institutions, the reporting criteria are:

- 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.
- 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 regarding home purchase originations, home remodel loan originations and refinancing available.

HMDA data for the state of were analyzed for the years 2002 through 2007.<sup>12</sup> As shown in Table 3.1, 2,101,926 loan applications were processed for home purchases, home improvements and refinancing. In most of these years, refinancing loans were the largest category. However, the ability to enter into a homeownership transaction is the focus of this particular analysis, so only home purchase loans were inspected.

Table 3.1   Purpose of Loan by Year   State of Louisiana   HMDA Data 2002 - 2007									
Purpose 2002 2003 2004 2005 2006 2007 Total									
Home Purchase	99,821	110,233	128,902	150,868	159,502	127,382	776,708		
Home Improvement	30,237	28,772	34,494	34,618	33,009	36,235	197,365		
Refinancing	192,280	276,228	209,575	174,648	137,070	137,121	1,126,922		
Multi-Family Dwelling   495   436   0   0   0   931									
Total	322,833	415,669	372,971	360,134	329,581	300,738	2,101,926		

Of the 776,708 home purchase loan applications, 692,990 were related to owner-occupied applications, as shown in Table 3.2. This subset represents the particular aspect of the home loan data that will be examined herein.

<sup>&</sup>lt;sup>12</sup> Starting in 2004, the HMDA data made substantive changes in reporting. It modified the way it handled Hispanic data, loan interest rates, as well as the reporting of multifamily loan applications.

Table 3.2     Owner Occupancy Status for Home Purchase Loan Application     State of Louisiana     HMDA Data 2002 - 2007									
Status 2002 2003 2004 2005 2006 2007 Total							Total		
Owner Occupied	91,058	98,922	115,070	133,225	141,177	113,538	692,990		
Not Owner Occupied	7,752	9,867	12,678	16,640	17,484	13,117	77,538		
Not Applicable	Not Applicable 1,011 1,444 1,154 1,003 841 727 6,180								
Total	99,821	110,233	128,902	150,868	159,502	127,382	776,708		

Financing institutions can take one of several actions pertaining to the loan application:

- "Originated" indicates that the loan was made by the lending institution.
- "Approved but not accepted" represents loans approved by the lender, but not accepted by the applicant. This generally occurs if better terms are found at another lending institution.
- "Application denied by financial institution" defines a situation where the loan application failed.
- "Application withdrawn by applicant" means that the applicant closed the application process.
- "File closed for incompleteness" means that the loan application process was closed by the institution due to incomplete information.
- "Loan purchased by the institution" indicates that the previously originated loan was purchased on the secondary market.

The outcome of the loan applications is presented in Table 3.3. Only loan originations and loan denials were inspected as an indicator of the underlying success or failure of home purchase loan applicants. In total, there were 328,211 loans originated and 113,724 loans denied, which resulted in a denial rate of 25.7 percent. The peak denial rate occurred in 2002 with a rate of 27.9 percent, while the lowest rate was seen in 2003 at 24.1 percent.

Table 3.3   Owner-Occupied Home Purchase Loan Applications by Action Taken   State of Louisiana   HMDA Data 2002 - 2007									
Action	2002	2003	2004	2005	2006	2007	Total		
Loan Originated	46,037	50,946	53,895	61,104	65,274	50,955	328,211		
Application Approved But Not Accepted	7,172	6,924	8,954	11,205	11,289	8,797	54,341		
Application Denied	17,783	16,151	17,869	21,869	22,122	17,930	113,724		
Application Withdrawn By Applicant	4,390	4,827	6,469	9,049	9,080	6,874	40,689		
File Closed for Incompleteness	1,653	1,671	2,163	2,884	2,987	2,348	13,706		
Loan Purchased by the Institution	14,023	18,403	25,720	26,786	30,413	26,604	141,949		
Preapproval Request Denied	0	0	0	327	7	19	353		
Preapproval Request approved but not accepted	0	0	0	1	5	11	17		
Total	91,058	98,922	115,070	133,225	141,177	113,538	692,990		
Denial Rate	27.9%	24.1%	24.9%	26.4%	25.3%	26.0%	25.7%		

Diagram 3.1 presents a comparison of loan denial rates for the state of Louisiana for the years 2002 through 2007.



Map 3.1 presents data on the geographic distribution of denial rates and shows that some areas in the state of Louisiana had loan denial rates above 65.0 percent.



Table 3.4 presents data on the rationale for loan denial. This table shows that the most common reasons for denial of an owner-occupied loan application were debt-to-income ratio and credit history, which suggests that further education efforts may be needed for potential homebuyers regarding financial literacy and building good credit.

Table 3.4     Owner-Occupied Home Purchase Loan Applications by Reason for Denial     State of Louisiana     HMDA Data 2002 - 2007								
Denial Reason	2002	2003	2004	2005	2006	2007	Total	
Debt-to-income Ratio	2,771	1,707	1,785	1,988	1,980	2,170	12,401	
Employment History	283	256	231	369	405	351	1,895	
Credit History	5,004	5,638	5,641	6,120	5,253	5,564	33,220	
Collateral	683	666	917	1,268	1,361	944	5,839	
Insufficient Cash	408	441	474	374	402	296	2,395	
Unverifiable Information	110	237	453	810	681	469	2,760	
Credit Application Incomplete	509	790	1,019	1,388	1,885	1,646	7,237	
Mortgage Insurance Denied	6	3	14	29	19	14	85	
Other	1,903	2,280	1,646	3,555	2,481	1,097	12,962	
Missing	6,106	4,133	5,689	5,968	7,655	5,379	34,930	
Total	17,783	16,151	17,869	21,869	22,122	17,930	113,724	

Table 3.5 displays denial rates by gender. In every year, denial rates for females were consistently higher than denial rates for males. Over the six-year period, the average denial rate for a female head of household was 6.9 percentage points higher than for a male head of household.

Table 3.5   Denial Rate for Owner-Occupied Home Purchase Loan   Applications by Gender   State of Louisiana   HMDA Data 2002 - 2007									
Year Male Female Not Provided Not Total by Applicant Applicable									
2002	22.9%	31.2%	51.4%	37.8%	27.9%				
2003	21.1%	28.2%	42.1%	2.1%	24.1%				
2004	22.2%	28.5%	44.3%	7.3%	24.9%				
2005	23.8%	30.4%	36.3%	26.3%	26.4%				
2006	22.8%	29.1%	36.9%	5.3%	25.3%				
2007	23.3%	30.2%	39.9%	8.6%	26.0%				
Total	22.7%	29.6%	42.9%	16.8%	25.7%				

Denial rates were calculated by race and ethnicity of the loan applicants as well. Table 3.8 shows that denial rates were higher for racial and ethnic minority applicants as compared to white applicants. While whites had a denial rate of 20.7 percent, blacks and Hispanics had much higher denial rates of 37.9 and 26.8 percent, respectively.

Table 3.6   Percent Denial Rates by Race   State of Louisiana   HMDA Data 2002 - 2007										
Year 2002 2003 2004 2005 2006 2007 Total										
American Indian or Alaskan Native	30.9%	36.5%	38.0%	38.6%	37.3%	34.5%	36.3%			
Asian or Pacific Islander	12.9%	17.2%	16.8%	20.8%	18.9%	18.4%	17.9%			
Black	41.6%	36.6%	36.0%	38.6%	36.7%	38.8%	37.9%			
Hispanic (Race)	21.7%	21.6%					21.6%			
White	21.2%	19.6%	20.0%	21.4%	20.4%	21.4%	20.7%			
Other	17.1%	23.0%								
Not Provided by Applicant	46.7%	37.5%	39.8%	38.1%	35.8%	34.2%	38.9%			
Not Applicable	28.6%	2.6%	19.2%	30.0%	4.8%	11.1%	18.4%			
Total 27.9% 24.1% 24.9% 26.4% 25.3% 26.0% 25.7%										
Hispanic (Ethnicity)	<b>.</b>	•	26.4%	28.3%	24.9%	28.1%	26.8%			

Map 3.2 presents the concentration of denial rates for black applicants. Several areas in the state showed a disproportionate share of loans denied to black applicants, with some areas exhibiting denial rates of over 82.0 percent.



2010 Analysis of Impediments

Map 3.3 shows the geographic distribution of loan applicant denial rates for Hispanic applicants in the state of Louisiana. As with the map for denial rates for black applicants, certain areas of disproportionally high denial rates were seen for Hispanic applicants, with some areas showing denial rates above 79.0 percent.



Map 3.4 shows the geographic distribution of loan application denial rates for Asian applicants. Certain areas within the state of Louisiana exhibited disproportionately high denial rates for Asians, with some areas reaching denial rates above 75.0 percent.



These data suggest that ethnic and racial minorities not only face higher loan denial rates than whites, but also that those denied applicants are concentrated in specific areas within the state. It remains to be seen if this is a result of steering practices or a non-biased assessment of individual applicant risk. In either case, it is important to note that ethnic and racial minorities in certain areas of the state of Louisiana are likely to have had difficulties in securing loans for owner-occupied homes.

Table 3.7 presents the reason for denial of loan application by race and ethnicity. There are approximately seven regulatory agencies that oversee the lending process; not all lenders report data in exactly the same way and not all lenders report a reason for the loan denial. In comparing the portion of absent reasons for loan denial by race, whites showed a 29.4 percent rate of missing loan denial reason, blacks showed a 27.9 percent rate and Asians

showed a 22.2 percent rate. These figures do not suggest significant bias in regulatory reporting.

Table 3.7     Owner-Occupied Home Purchase Loan Applications by Reason for Denial by Race     State of Louisiana     HMDA Data 2002 - 2007								
Denial Reason	American Indian or Alaskan Native	Asian or Pacific Islander	Black	White	Not Provided by Applicant	Total <sup>13</sup>	Hispanic (Ethnicity)	
Debt-to-income Ratio	87	171	3,577	7,219	1,229	12,401	234	
Employment History	9	44	412	1,252	163	1,895	42	
Credit History	214	240	11,027	17,774	3,740	33,220	507	
Collateral	28	88	1,292	3,520	870	5,839	149	
Insufficient Cash	15	31	739	1,300	286	2,395	63	
Unverifiable Information	16	70	947	1,342	347	2,760	101	
Credit Application Incomplete	38	166	1,679	4,397	898	7,237	186	
Mortgage Insurance Denied	0	2	23	54	6	85	5	
Other	76	181	4,075	7,143	1,328	12,962	266	
Missing	206	284	9,206	18,333	6,697	34,930	717	
Total	689	1,277	32,977	62,334	15,564	113,724	2,270	
% Missing	29.9%	22.2%	27.9%	29.4%	43.0%	30.7%	31.6%	

Table 3.8 shows denial rates by income. As one might expect, households with lower incomes tended to have a higher rate of denial than households with higher incomes. In the state of Louisiana, households with incomes below \$15,000 had an average denial rate of 62.6 percent, while households with incomes of \$75,000 and above had an average denial rate of only 13.2 percent over the six year period.

Table 3.8   Percent Denial Rates by Income by Year   State of Louisiana   HMDA Data 2002 - 2007									
Year 2002 2003 2004 2005 2006 2007 Total									
<= \$15K	63.2%	60.5%	60.7%	67.9%	58.0%	67.0%	62.6%		
\$15K - \$30K	45.3%	39.8%	40.8%	44.9%	44.6%	45.4%	43.3%		
\$30K - \$45K	30.2%	25.5%	25.9%	28.6%	29.1%	29.6%	28.1%		
\$45K - \$60K	21.4%	19.6%	20.1%	23.6%	23.7%	25.0%	22.4%		
\$60K - \$75K	14.2%	13.6%	15.1%	17.7%	19.4%	20.7%	17.1%		
Above \$75K	10.2%	9.8%	11.6%	13.8%	14.9%	15.7%	13.2%		
Data Missing	19.7%	20.8%	41.6%	22.6%	23.3%	28.6%	26.3%		
Total	27.9%	24.1%	24.9%	26.4%	25.3%	26.0%	25.7%		

Table 3.9 presents denial rates segmented by both race or ethnicity and income. Even when correcting for income, minority racial and ethnic groups faced a much higher loan denial rate than whites. For example, blacks experienced much higher loan denial rates than whites at all income levels: at income levels below \$15,000 blacks showed denial rates of 68.2 percent compared to a 57.3 percent denial rate for whites, and at income levels above \$75,000 blacks showed a denial rate of 25.1 percent while whites showed a denial rate of only 10.6 percent.

<sup>&</sup>lt;sup>13</sup> Total does not sum because the Hispanic (Race), Other, and Not Applicable categories were excluded from the above table.

Table 3.9     Percent Denial Rates of Owner-Occupied Home Purchase Loans by Race by Income     State of Louisiana     HMDA Data 2002 - 2007									
Year	<= \$15K	\$15K - \$30K	\$30K - \$45K	\$45K - \$60K	\$60K - \$75K	Above \$75K	Data Missing	Total	
American Indian or Alaskan Native	74.6%	53.1%	35.3%	35.3%	25.6%	21.7%	33.3%	36.3%	
Asian or Pacific Islander	50.6%	27.4%	19.0%	16.6%	16.7%	14.0%	14.2%	17.9%	
Black	68.2%	48.7%	35.2%	30.9%	27.0%	25.1%	41.7%	37.9%	
White	57.3%	38.1%	24.1%	18.7%	14.0%	10.6%	18.2%	20.7%	
Not Provided by Applicant	67.9%	59.9%	42.1%	34.9%	27.3%	21.7%	54.5%	38.9%	
Not Applicable	63.6%	51.0%	35.2%	14.1%	9.1%	7.5%	2.7%	18.4%	
Total	62.6%	43.3%	28.1%	22.4%	17.1%	13.2%	26.3%	25.7%	
Hispanic (Ethnicity)	64.4%	43.5%	27.8%	24.3%	22.3%	19.2%	18.9%	26.8%	

In addition to modifications implemented in 2004 for documenting 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;
- 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 for home purchases when contrasted with comparable treasury instruments, or five percentage points for refinance loans.

Originated owner-occupied home purchase loans qualifying as HALs were identified for 2004 through 2007. These high-interest loans are considered predatory in nature. Table 3.10 shows the total number of originated loans and originated loans that were HALs. As seen therein, there were 59,198 home purchase loans, 12,357 home improvement loans and 68,595 refinance loans in this time period that had these high-interest rate characteristics. In total, 25.6 percent of all originated owner-occupied home purchase loans were considered HALs.

Table 3.10     Originated Owner-Occupied Loans by Year Loan Purpose by HAL Status     State of Louisiana     HMDA 2004 - 2007										
Loan Purpose	Loan Purpose 2004 2005 2006 2007 Total									
	Other Originated	43,125	43,365	45,950	39,590	172,030				
Home Purchase	High APR Loan	10,770	17,739	19,324	11,365	59,198				
	Percent High APR	20.0%	29.0%	29.6%	22.3%	25.6%				
	Other Originated	10,758	10,327	10,440	11,173	42,698				
Home Improvement	High APR Loan	3,060	2,957	3,010	3,330	12,357				
	Percent High APR	22.1%	22.3%	22.4%	23.0%	22.4%				
	Other Originated	48,761	34,097	27,868	30,350	141,076				
Refinancing	High APR Loan	19,212	18,532	16,347	14,504	68,595				
	Percent High APR	28.3%	35.2%	37.0%	32.3%	32.7%				
	Other Originated	102,644	87,789	84,258	81,113	355,804				
Total	High APR Loan	33,042	39,228	38,681	29,199	140,150				
	Percent High APR	24.4%	30.9%	31.5%	26.5%	28.3%				

As shown in Table 3.11, of the 59,198 home purchase HALs originated during this time period, 35,228 were originated to white applicants and 17,532 were originated to black applicants.

Table 3.11     Owner-Occupied Home Purchase HALs Originated by Race     State of Louisiana     HMDA Data 2004 - 2007										
Race 2004 2005 2006 2007 Total										
American Indian	66	87	65	57	275					
Asian	162	230	232	163	787					
Black	lack 3,178 5,617 5,624 3,113 17,532									
White	6,576	10,384	11,180	7,088	35,228					
Not Provided by Applicant	772	1,419	2,220	941	5,352					
Not Applicable	Not Applicable 16 2 3 3 24									
Total 10,770 17,739 19,324 11,365 59,198										
Hispanic	261	490	698	300	1,749					

Table 3.12 shows the percent of HALs originated by race. While whites had 20.9 percent of owner-occupied loans as HALs, blacks had more than double these rates at 43.9 percent. This finding suggests that blacks tended to possess a higher share of loans with high interest rate characteristics and, hence, bore a larger burden of foreclosure risk.

Table 3.12   Percent of HAL Owner-Occupied Home Purchase Loans   Originated by Race   State of Louisiana   HMDA Data 2004 - 2007									
Race 2004 2005 2006 2007 Total									
American Indian	29.7%	38.5%	33.7%	31.3%	33.4%				
Asian	14.4%	21.9%	19.1%	15.9%	17.8%				
Black or African American	34.0%	52.5%	50.0%	36.1%	43.9%				
White	16.7%	23.0%	23.8%	19.0%	20.9%				
Not Provided by Applicant	21.6%	35.4%	39.5%	24.8%	31.5%				
Not Applicable	10.3%	14.3%	15.0%	12.5%	11.2%				
Total	20.0%	29.0%	29.6%	22.3%	25.6%				
Hispanic	18.4%	30.9%	37.6%	22.5%	28.3%				

Map 3.5 illustrates the geographic distribution of the percent of total HALs originated. This map shows that HALs were not distributed evenly throughout the state of Louisiana. Within some areas, more than 78.0 percent of all originated home purchase loans were HALs.



Map 3.6 presents the geographic distribution of high interest rate loans originated to black applicants and shows that some areas of the state had more than 84.0 percent of all loans originated as HALs.



Map 3.6 Percent of Total High Annual Percentage Rate Loans Originated to Black Applicants State of Louisiana HMDA Data 2004-2007

Map 3.7 shows the distribution of HALs originated to Hispanic applicants. The state of Louisiana saw areas where more than 80.0 of all loans originated to Hispanic applicants as high-interest rate loans.



Map 3.7 Percent of Total High Annual Percentage Rate Loans Originated to Hispanic Applicants

Map 3.8 presents the geographic distribution of HALs originated to Asian applicants. HALs issued to Asians were not spread uniformly throughout the state of Louisiana, but were disproportionately concentrated in a few areas of the state, with some areas seeing HALs comprising above 75.0 percent of all originated owner-occupied loans.



# SUMMARY

## LENDING ACTIVITY

Several federal laws affect lending practices, such as the Fair Housing Act, the Equal Credit Opportunity Act, the Community Reinvestment Act and the Home Mortgage Disclosure Act (HMDA). HMDA data are the most inclusive lending data available and were used to analyze lending practices in the state of Louisiana. HMDA data for the state of Louisiana from 2002 to 2007 showed 2,101,926 loan applications were processed for home purchases, home improvements and refinancing, with 692,990 loan applications for owner-occupied home purchases.

# **DENIAL RATES**

In regard to the 692,990 owner-occupied home purchase applications, excluding loan applications that were withdrawn by the applicant, incomplete or accepted by the prospective lender but not exercised by the applicant, there were 328,211 loan originations and 113,724 loan denials for an average loan denial rate of 25.7 percent. The most common reasons for denial of an owner-occupied loan applicant were credit history and debt-to-income ratio. Denial rates were not even; whites had a denial rate of 20.7 percent, while blacks and Hispanics had higher denial rates of 37.9 and 26.8 percent, respectively.

Higher rates of denial for racial and ethnic minorities, regardless of income, were also measured. Blacks experienced much higher loan denial rates than whites at all income levels. White applicants with incomes below \$15,000 dollars were denied 57.3 percent of the time, while black applicants in the same income range were denied 68.2 percent of the time. This was also true for applicants with incomes above \$75,000, wherein whites had a denial rate of 10.6 percent and blacks had a denial rate of 25.1 percent. These higher denial rates were also observed in specific areas of the state.

## HIGH ANNUAL PERCENTAGE RATE LOANS

HMDA data report loan originations with unusually high annual percentage rate loans, or HALs, which are loans that may be considered predatory in nature. While whites had 20.9 percent of owner-occupied loans as HALs, blacks had more than double this rate at 43.9 percent. Hispanics had a moderate rate of HALs at 28.3 percent. These minority groups tended to carry a disproportionately higher share of foreclosure risk due to such high numbers of home purchase HALs.

# SECTION IV. FAIR HOUSING AGENCIES AND PROGRAMS

The following narrative provides an enumeration of key agencies and organizations contributing to affirmatively furthering fair housing in Louisiana. It concludes with a succinct review of the housing complaint intake and review processes.

# MAJOR FAIR HOUSING ORGANIZATIONS

### THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

The United States Department of Housing and Urban Development (HUD) oversees, administers and enforces the Fair Housing Act. HUD has ten regional offices throughout the U.S., and HUD's regional office in Ft. Worth, Texas oversees housing, community development and fair housing enforcement in Louisiana, as well as in Arkansas, New Mexico, Oklahoma, and Texas, with field offices in Louisiana in New Orleans and Shreveport.<sup>14</sup> The Office of Fair Housing and Equal Opportunity (FHEO) within HUD's Ft. Worth office enforces the federal Fair Housing Act and other civil rights laws that prohibit discrimination in housing, mortgage lending and other related transactions against the following protected classes: race, sex, religion, familial status, disability, national origin and color. 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 and Fair Housing Initiative Program.

#### FAIR HOUSING ASSISTANCE PROGRAM

In the U.S., many agencies receive funding directly from HUD as Fair Housing Assistance Programs (FHAPs). FHAPs require an ordinance or law that empowers a local governmental agency to enforce local fair housing laws; if HUD determines that the local entity can operate on a "substantially equivalent" level to federal agency enforcement activities, HUD contracts with that agency to process fair housing complaints and reimburses the jurisdiction on a per case basis.<sup>15</sup> FHAP grants are given to public, not private, entities and are given on a noncompetitive, annual basis to substantially equivalent state and local fair housing enforcement agencies.

To create a substantially equivalent agency, a state or local jurisdiction must first enact a fair housing law that is substantially equivalent to federal laws. In addition, the local jurisdiction must have both the administrative capability and fiscal ability to carry out the law. With these elements in place, the jurisdiction may apply to HUD in Washington D.C. for substantially equivalent status. The jurisdiction's law would then be examined, and the federal government would make a determination as to whether it was substantially equivalent to federal fair housing law.

<sup>&</sup>lt;sup>14</sup> http://www.hud.gov/offices/fheo/aboutfheo/fhhubs.cfm#hdcent

<sup>&</sup>lt;sup>15</sup> http://www.hud.gov/offices/fheo/progdesc/title8.cfm

When substantially equivalent status has been granted, complaints of housing discrimination are dually filed with the state (or local agency) and with HUD. The state or local agency investigates most complaints; however, when federally subsidized housing is involved, HUD will typically investigate the complaint. Still, the state or local agencies are reimbursed for complaint intake and investigation and are awarded funds for fair housing training and education.

### FAIR HOUSING INITIATIVE PROGRAM

A Fair Housing Initiative Program (FHIP) participant may be a government agency, a private non-profit or a for-profit organization. FHIPS are funded through a competitive grant program which provides funds to organizations to carry out projects and activities designed to enforce and enhance compliance with fair housing laws. Eligible activities include education and outreach to the public and the housing industry on fair housing rights and responsibilities, as well as enforcement activities in response to fair housing complaints, including testing and litigation. The following FHIP initiatives provide funds and competitive grants to eligible organizations:

The Fair Housing Organizations Initiative (FHOI) provides funding that builds the capacity and effectiveness of non-profit fair housing organizations by providing funds to handle fair housing enforcement and education initiatives more effectively. FHOI also strengthens the fair housing movement nationally by encouraging the creation and growth of organizations that focus on the rights and needs of underserved groups, particularly people with disabilities.

#### Grantee eligibility:

Applicants must be qualified fair housing enforcement organizations with at least two years of experience in complaint intake, complaint investigation, testing for fair housing violations, and meritorious claims in the three years prior to the filing of their application.

#### **Eligible activities:**

The basic operation and activities of new and existing non-profit fair housing organizations.

**The Private Enforcement Initiative (PEI)** offers a range of assistance to the nationwide network of fair housing groups. This initiative funds non-profit fair housing organizations to carry out testing and enforcement activities to prevent or eliminate discriminatory housing practices.

### Grantee eligibility:

Fair housing enforcement organizations that meet certain requirements related to the length and quality of previous fair housing enforcement experience may apply for FHIP-PEI funding.

#### Eligible activities:

Conducting complaint-based and targeted testing and other investigations of housing discrimination, linking fair-housing organizations in regional enforcement

activities, and establishing effective means of meeting legal expenses in support of fair housing litigation.

**The Education and Outreach Initiative (EOI)** offers a comprehensive range of support for fair housing activities, providing funding to state and local government agencies and non-profit organizations for initiatives that explain to the general public and housing providers what equal opportunity in housing means and what housing providers need to do to comply with the Fair Housing Act.

### Grantee eligibility:

State or local governments, qualified fair housing enforcement organizations (those with at least two years of experience), other fair housing organizations, and other public or private nonprofit organizations representing groups of people protected by the FHA may apply for FHIP-EOI funding.

### Eligible activities:

A broad range of educational activities that can be national, regional, local or community-based in scope. Activities may include developing education materials, providing housing counseling and classes, convening meetings that bring together the housing industry with fair housing groups, developing technical materials on accessibility, and mounting public information campaigns. National projects that demonstrate cooperation with the real estate industry or focus on resolving the community tensions that arise as people expand their housing choices may be eligible to receive preference points.

**The Administrative Enforcement Initiative (AEI)** helps state and local governments who administer laws that include rights and remedies similar to those in the Fair Housing Act implement specialized projects that broaden an agency's range of enforcement and compliance activities. No funds are available currently for this program.

In 2006, the FHIP program awarded \$18.1 million: \$13.9 million for PEI grants and \$4.2 million for EOI. Three organizations in Louisiana received a FHIP grant in 2006:

Louisiana ACORN Fair Housing Organization, A Project of ACORN Community Land Association

Education and Outreach Initiative - Fair Housing Awareness Component

Award Amount: \$100,000

Louisiana ACORN Fair Housing Organization will partner with grassroots and faithbased organizations to provide fair housing education and outreach to Katrina survivors in southern Louisiana. To raise awareness of fair housing, Louisiana ACORN Fair Housing Organization will distribute 40,000 pieces of educational literature in English, Spanish, and Vietnamese; conduct a telephone survey of 3,000 persons; and perform 3,000 door-to-door visits. As a result of its efforts, Louisiana ACORN Fair Housing Organization expects to receive about 100 inquiries and refer at least 20 housing discrimination complaints to HUD.

Advocacy Center Education and Outreach Initiative - Disability Component Award Amount: \$100,000

The Advocacy Center will partner with two community-based organizations to provide a statewide fair housing education and outreach program for persons with disabilities. Although the program will be statewide, it will focus on the eleven parishes hardest hit by Hurricane Katrina where approximately 850,000 disabled residents were displaced.

Greater New Orleans Fair Housing Action Center Private Enforcement Initiative - General Component Award Amount: \$275.000

The Greater New Orleans Fair Housing Action Center (GNOFHAC) is a full service, private fair housing organization that will provide enforcement services and conduct systemic investigation in the New Orleans area. GNOFHAC will receive, investigate, mediate, and refer housing discrimination complaints. GNOFHAC will also recruit and train testers to conduct testing of the housing, lending, and insurance markets. <sup>16</sup>

In 2007, the FHIP program awarded \$18.1 million: \$14 million for PEI and \$4.1 for EOI. Two organizations operating in Louisiana received FHIP grants that year.

Greater New Orleans Fair Housing Action Center

Private Enforcement Initiative – General Component

Award Amount: \$275,000

Greater New Orleans Fair Housing Action Center (FHAC) will conduct an array of fair housing enforcement activities that will include taking in a minimum of 125 new fair housing complaints, ensuring appropriate investigation of possible rental, sales and lending discrimination by conducting paired tests, and recruiting and training 20 new testers. FHAC will also conduct enforcement projects designed to determine the extent of discrimination against underserved populations and refer at least 25 enforcement proposals to HUD over the next year. In addition, FHAC will make 25 fair housing presentations to 300 first-time home buyers and groups working to further fair housing, and conduct its 12th annual Fair Housing Summit.

New Orleans Advocacy Center

Education and Outreach Initiative – General Component

Award Amount: \$100,000

The Advocacy Center will educate disabled Louisiana residents displaced by Hurricanes Katrina and Rita about their fair housing rights and what to do if they believe their rights have been violated. The Center will also inform housing providers about their responsibilities under the Fair Housing Act and how it makes good business sense to comply with fair housing laws. Specific education and outreach activities will be conducted in parishes hit hard by the storms, including Orleans, St. Bernard, Plaquemines, Jefferson, St. Tammany, Calcasieu, Cameron, Lafourche, Terrebonne, Vermilion, and St. May Louisiana.<sup>17</sup>

<sup>&</sup>lt;sup>16</sup> http://www.hud.gov/offices/fheo/partners/FHIP/fhip.cfm

<sup>&</sup>lt;sup>17</sup> http://www.hud.gov/news/releases/pr07-148.pdf

In 2008 the FHIP program awarded \$21.8 million: \$20 million for PEI and \$1.3 million for EOI. An additional \$500,000 was granted for an EOI Clinical Law School Component - \$500,000. One organization in Louisiana received a FHIP grant in 2008.

Greater New Orleans Fair Housing Action Center

Private Enforcement Initiative General

Component Award Amount - \$275,000

Greater New Orleans Fair Housing Action Center (FHAC) will continue its services to all individuals and families in the New Orleans MSA. FHAC proposes to utilize funding to conduct intake of new complaints alleging violations of federal and state fair housing laws; analyze complaints to determine appropriate investigative technique and/or referral; ensure appropriate investigations of housing discrimination by conducting paired rental/sales/insurance and lending tests; and conduct recruitment and training of new testers. FHAC will also conduct enforcement projects to assist in determining the nature/extent of discrimination against underserved populations. FHAC will conduct education and outreach activities and provide training to local governments, housing consumers, and housing providers.<sup>18</sup>

# LOCAL FAIR HOUSING ORGANIZATIONS

The state of Louisiana has both a FHAP organization, the Louisiana Department of Justice, and a FHIP organization, the Greater New Orleans Fair Housing Action Center, in operation.

## LOUISIANA DEPARTMENT OF JUSTICE, PUBLIC PROTECTION DIVISION

Public Protection Division of the Louisiana Department of Justice enforces the Louisiana Equal Housing Opportunity Act of 1991. This law prohibits discrimination based on the same protected classes as the national Fair Housing Act: race, color, sex, religion, familial status, disability and national origin in circumstances of renting or selling housing. This organization accepts, mediates and resolves fair housing complaints that are submitted in the state.

### **GREATER NEW ORLEANS FAIR HOUSING ACTION CENTER**

The Greater New Orleans Fair Housing Action Center (FHAC) is located in New Orleans and enforces the additional fair housing protections that exist in Orleans Parish, which include sexual orientation, gender identification, marital status and age. The FHAC has three main programs: investigation and enforcement, education and outreach, and homeownership protection.

<sup>&</sup>lt;sup>18</sup> http://www.hud.gov/offices/fheo/partners/FHIP/FY2008FHIP.cfm#mn

# COMPLAINT AND COMPLIANCE REVIEW

#### COMPLAINT PROCESS FOR THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

According to the HUD website, any person who feels their housing rights have been violated may submit a complaint to HUD via phone, mail or the Internet. A complaint can be submitted to the national HUD office at:

Office of Fair Housing and Equal Opportunity Department of Housing and Urban Development Room 5204 451 Seventh St. SW Washington, DC 20410-2000 (202) 708-1112 1-800-669-9777 http://www.hud.gov/offices/fheo/online-complaint.cfm

In Louisiana, the contact information for the regional HUD office is as follows:

Ft. Worth Regional Office of FHEO Department of Housing and Urban Development 801 Cherry Street, Unit #45 Suite 2500 Fort Worth, TX 76102 Phone: (817) 978-5965 Email: TX\_webmanager@hud.gov Fax: (817) 978-5569

When a complaint is submitted in areas that lack a substantially equivalent state or local government agency, HUD intake specialists review the information and contact the complainant in order to gather additional details and to determine if the case qualifies as possible housing discrimination. Complaints that are specific to a state or locality that is part of HUD's Fair Housing Assistance Program, or a substantially equivalent agency, are referred to the appropriate state or local parties, who have 30 days to address the complaint. If HUD is handling the case, the formal complaint is sent to the complainant for review and is then forwarded to the alleged violator for review and response.

Next, the circumstances of the complaint are investigated through conducting interviews and examining relevant documents. During this time, the investigator attempts to rectify the situation through mediation, if possible.

The case is closed if mediation of the two parties is achieved or if the investigator determines that there was no reasonable cause of discrimination. If reasonable cause is
found and mediation fails, then either a federal judge or a HUD Administrative Law Judge hears the case and determines damages, if any.<sup>19</sup> A respondent may be ordered to:

- Compensate for actual damages, including humiliation, pain and suffering.
- Provide injunctive or other equitable relief, for example, to make the housing available.
- Pay the Federal Government a civil penalty to vindicate the public interest. The maximum penalties are \$10,000 for a first violation and \$50,000 for a third violation within seven years.
- Pay reasonable attorney's fees and costs.<sup>20</sup>

However, if a substantially equivalent agency exists for the geographic areas, HUD will defer the complaint to the substantially equivalent agency. Thereafter, the complaint and its issues and outcomes are tracked as a "dually filed" complaint.

#### Section 504 Complaints

In addition to general fair housing discrimination complaints, HUD accepts specific complaints that violate Section 504 of the Rehabilitation Act of 1973, which prohibits programs or organizations that receive federal funds from discriminating against persons with disabilities. In relation to housing, this means that any housing program that accepts federal monies must promote equal access of units, regardless of disability status. Both mental and physical handicap are included in Section 504. An example of a Section 504 violation is a public housing manager who demands a higher housing deposit to a person in a wheelchair because of the anticipated damage that a wheelchair may cause. This violates Section 504 in that a person cannot be held to different standards or liabilities due to disability.

Complaints that are in violation of Section 504 are filed and processed in the same manner as general fair housing complaints.<sup>21</sup>

## COMPLAINT PROCESS FOR THE LOUISIANA DEPARTMENT OF JUSTICE

A person who wishes to file a complaint with the Louisiana Department of Justice (LDOJ) can call 1-800-273-5718 in order to receive a complaint form. The complaint form must be submitted to the LDOJ within one year of occurrence of the alleged discriminatory incident. The complaint should include information such as the name and address of all parties involved and a description of the incident including the date it occurred. The complaint form should be submitted to:

<sup>&</sup>lt;sup>19</sup> http://www.hud.gov/offices/fheo/complaint-process.cfm

<sup>&</sup>lt;sup>20</sup> http://www.hud.gov/offices/fheo/FHLaws/yourrights.cfm

<sup>&</sup>lt;sup>21</sup> http://www.hud.gov/offices/fheo/disabilities/sect504faq.cfm

Louisiana Department of Justice Equal Housing Opportunity Section PO Box 94005 Baton Rouge, LA 70804-9005

After the complaint form is submitted, the complainant is sent a letter verifying that the complaint was received and that investigation will occur. The complainant is asked to submit all information regarding the incident that supports the case of discrimination. At that time, the respondent is also notified that a complaint has been filed against them and is given the opportunity to submit information supporting the claim that no discrimination occurred. Next, interviews are conducted with each party. Mediation can be attempted within ten days of filing a complaint, but only if agreement is reached to mediate by both parties. If the matter cannot be resolved through mediation or conciliation, then a determination is made by the Louisiana Attorney General's Office. If evidence supports discrimination, a lawsuit is filed in state court on behalf of the complainant by the Attorney General's Office. However, the complainant may also choose to file the complaint with a private attorney in state court within two years of the incident. If discrimination is not supported by the investigation, then the complaint is dismissed.<sup>22</sup>

# **SUMMARY**

#### FAIR HOUSING AGENCIES AND ORGANIZATIONS

In Louisiana a small number of agencies and organizations exist to address the fair housing needs of the state. These organizations include the U.S. Department of Housing and Urban Development, the Louisiana Department of Justice, and the Greater New Orleans Fair Housing Action Center. These agencies accept fair housing complaints within the state.

<sup>&</sup>lt;sup>22</sup> http://www.ag.louisiana.gov/Shared/ViewDoc.aspx?Type=3&Doc=236

# SECTION V. EVALUATION OF THE FAIR HOUSING PROFILE

The following narrative presents several perspectives about the status of the fair housing system in Louisiana, including a review of national and regional fair housing cases and studies, an assessment of U.S. Department of Justice cases, and an examination of housing complaints filed within the region. It also includes findings from a fair housing survey and feedback gathered from a fair housing forum.

# FAIR HOUSING STUDIES AND CASES

#### **RELATED NATIONAL FAIR HOUSING STUDIES**

In 2000, the U.S. Department of Housing and Urban Development (HUD) released "Discrimination in Metropolitan Housing Markets" (HDS2000), measuring the prevalence of housing discrimination based on race or color in the U.S. The third nationwide effort to measure discrimination against minority home seekers since 1977, HDS2000 measured discrimination in metropolitan areas with populations greater than 100,000 and significant black, Hispanic and/or Native American minorities. The study found that discrimination persists in both rental and sales markets of large metropolitan areas nationwide, but that its incidence has generally declined since 1989. The exception was for Hispanic renters, who faced essentially the same incidence of discrimination in 2000 as they did in 1989.

In April 2002, HUD released, "How Much Do We Know?," a national study which assessed public awareness of and support for fair housing law. The study found that only one-half of the general public was able to identify six or more of eight 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 done something about it. Last, two-thirds of all respondents said that they would vote for a fair housing law.<sup>23</sup>

As a follow-up, in February 2006 HUD released "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, as well as its desire to report such discrimination. Unfortunately, the study found that overall public knowledge of fair housing laws had not improved between 2000 and 2005. As before, just half of the public knew the law with respect to six or more illegal housing activities. In the 2006 report, 17 percent of the study's adult participants claimed to have experienced 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 didn't know where to complain, assumed it would cost too much, were too busy or feared retribution. One

<sup>&</sup>lt;sup>23</sup> http://www.huduser.org/Publications.

<sup>2010</sup> Analysis of Impediments

positive finding of the survey was that public support for fair housing laws increased from 66 percent in 2000 to 73 percent in 2005.<sup>24</sup>

In 2004, the U.S. General Accounting Office's (GAO) released "Fair Housing: Opportunities to Improve HUD's Oversight and Management of the Enforcement Process." The GAO report found that, although the process had improved in recent years, 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 FHAP agencies. The report did find a higher percentage of investigations completed within the FHA's 100-day mandate.<sup>25</sup> 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, though race was still the most cited basis of housing discrimination over the period.
- FHAP agencies conducted more fair housing investigations than FHEO agencies over the eight-year period. The total number of investigations completed each year increased somewhat after declining in 1997 and 1998.
- Investigation outcomes changed during this time, with an increasing percentage closed without a finding of reasonable cause to believe discrimination occurred. A declining percentage of investigations were resolved by the parties themselves or with help from FHEO or FHAP agencies.

In January 2005, the Center for Community Capital at the University of North Carolina at Chapel Hill reported that the following three predatory loan terms increase the risk of mortgage foreclosure in subprime home loans: prepayment penalties, balloon payments and adjustable rates. The study examined recent home mortgages while controlling for credit scores, loan terms and varying economic conditions.<sup>26</sup> For example, in the prime lending market only two percent of home loans carry prepayment penalties of any length. Conversely, up to 80 percent of all subprime mortgages carry a prepayment penalty, a fee for paying off a loan early. An abusive prepayment penalty extends more than three years and/or costs more than six months' interest.<sup>27</sup> While previous studies have linked subprime lending with home loss, this study was the first to identify specific abusive terms that lead to foreclosure.

In May 2005, HUD published "Discrimination against Persons with Disabilities: Barriers at Every Step." The study documented findings about rental discrimination toward two groups in the Chicago Metropolitan Area: deaf individuals using a telephone relay service and persons in wheelchairs. The research resulted in three significant findings: landlords refused to speak to one in four of the deaf callers, both groups received less encouragement than able individuals, and most landlords agreed to any reasonable accommodation and modifications requests."<sup>28</sup>

<sup>&</sup>lt;sup>24</sup> *Do We Know More Now*? United States Department of Housing and Urban Development, Office of Policy Development and Research, 2006. Document available at http://www.huduser.org/Publications.

<sup>&</sup>lt;sup>25</sup> Fair Housing: Opportunities to Improve HUD's Oversight and Management of the Enforcement Process, United States General Accounting Office, Report to Congressional Requesters, April 2004.

<sup>&</sup>lt;sup>26</sup> http://www.kenan-flagler.unc.edu/assets/documents/foreclosurerelease.pdf

 <sup>&</sup>lt;sup>27</sup> http://www.kenan-nagler.une.edu/assets/documents/oreclosureretass
<sup>27</sup> http://www.responsiblelending.org/pdfs/2b003-mortgage2005.pdf

<sup>&</sup>lt;sup>28</sup> http://www.huduser.org/publications/hsgspec/dds.html.

Released by the Poverty and Race Research Action Council in January 2008, "Residential Segregation and Housing Discrimination in the United States" presented evidence that many current governmental efforts to further fair housing may actually result in furthering unfair housing practices across the U.S, specifically residential segregation. For example, the majority of public housing residents are non-white and most public housing units are grouped in the same census tracts, which results in residential segregation. Similarly, many Section 8 voucher holders are racial or ethnic minorities and most housing that accepts Section 8 vouchers is grouped in a few select areas, which again results in residential segregation. The report offers recommendations to curb such practices, which include:

- Dispersing public housing developments throughout cities and communities and
- Providing greater incentives for landlords with properties throughout an area to accept housing aid coupons.

A study released in April 2009, entitled "Segregation and the Subprime Lending Crisis," presents research on the relationship between residential segregation and subprime lending, specifically whether geographic areas with increased levels of residential segregation have a disproportionate share of subprime loans. The study concluded that, when controlling for other socio-economic factors traditionally attributed to the prevalence of high risk loans, racial segregation proved to be a strong determinant of high cost loans, with segregation of black populations having a stronger effect than segregation for Hispanic populations.<sup>29</sup>

## **RELATED NATIONAL FAIR HOUSING CASES**

In a landmark fraud case, Westchester County, New York, was ordered to pay more than \$50 million dollars to resolve allegations of misusing federal funds for public housing projects and falsely 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 Analysis of Impediments. In the settlement, Westchester County will be 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 must also set aside \$20 million to build public housing units in suburbs and areas with mostly white populations. The ramifications of this case are expected to affect housing policies of entitlement communities across the nation, which will likely be held to higher levels of scrutiny to ensure that federal funds are being spent in the best interest of protected classes.

## **RELATED STATEWIDE FAIR HOUSING STUDIES**

In 2005, the National Fair Housing Alliance conducted a study to assess the level of housing discrimination displaced residents encountered when relocating to undamaged areas in the wake of Hurricane Katrina. While this study evaluated discrimination outside of Louisiana, it focused

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<sup>&</sup>lt;sup>29</sup> Squires, Gregory D., Derek S, Hyra and Robert N. Renner. "Segregation and the Subprime Lending Crisis." April, 2009.

on discrimination against displaced Louisiana residents. The study found that 66 percent of African American evacuees faced some form of housing discrimination following the storm. The most frequent types of discrimination encountered concerned receiving accurate information about the terms and conditions of rentals and the availability of rental units. White testers were repeatedly told apartments were available and given correct information on the terms and conditions for securing an apartment, while blacks were often told no apartments were available or were quoted higher rent prices or larger security deposits.<sup>30</sup>

In 2006, the NAACP issued a report detailing the state of housing one year after Hurricane Katrina and offered policy recommendation focused on the equitable rebuilding of the hurricane damaged region. The research showed the natural disaster of Katrina exacerbated existing man-made problems of fair and affordable housing. The evidence showed blacks experienced housing discrimination when attempting to secure alternate housing. The acute residential segregation in New Orleans contributed to the disproportionate impact of the storm on minority communities with 80 percent of the most flooded areas consisting of nonwhite residents. Also, the policies put in place one year after the storm had the potential to re-establish the segregation that existed prior to the storm thereby limiting the opportunities for personal growth and development available to the African American community.<sup>31</sup>

A housing discrimination study conducted over the period of 2004 to 2006 evaluated changes in discriminatory behavior in pre- and post-Katrina housing markets. The study argued housing discrimination can occur in preliminary phone interactions, based on the caller's accent, command of the English language or other verbal cues that reveal the potential race of the applicant. After conducting 504 calls to 168 rental agents during the 2004 through 2006 period, it was found that the likelihood of a Latino encountering some form of discrimination not only depended upon the ethnic or linguistic cues from verbal interaction, but also from the current condition of the housing market. Unlike other fair housing studies, it was rare for agents to give differing information between White and Latino callers, however it was common that terms and conditions regarding available units differed by race. When statistical analysis was applied to the data, race was found to be a statistically significant factor in determining specific terms and conditions. Furthermore, the specific discriminatory action varied as housing market conditions varied. The study found discriminatory behavior existed before and after Hurricane Katrina, but the methods of discrimination changed as a result of changes in the housing market.<sup>32</sup>

The Center for Social Inclusion issued a report in 2006 which examined the impact of relief policies by race and their effect on minority opportunities within the hurricane affected regions of New Orleans. The report predicted the outcomes different policy choices could produce and illuminated the policy imperative to include racial considerations into the rebuilding process. This rebuilding process was evaluated across many different categories, including its effect on rental housing by race, and revealed the difficult challenges minority and black families must face to secure adequate housing.

 $<sup>^{30}\</sup> http://www.nationalfairhousing.org/LinkClick.aspx?fileticket=dhpik3cZYgc\%3D\&tabid=2555\&mid=5418$ 

<sup>&</sup>lt;sup>31</sup> http://4909e99d35cada63e7f757471b7243be73e53e14.gripelements.com/publications/Housing\_in\_NOLA\_KI\_OppAg\_NAACP.pdf <sup>32</sup> http://www.allacademic.com/meta/p\_mla\_apa\_research\_citation/1/8/4/6/9/p184698\_index.html

Recommendations to increase the availability of affordable housing and decrease the hardships minorities undergo when securing housing were presented.<sup>33</sup>

In 2007, the American Civil Liberties Union issued a report detailing the situation two years after Katrina ravened Louisiana and Mississippi's coastal areas. The report outlined the many instances of racial injustice, from police abuse to inadequate medical care to the racial basis of official reconstruction policies. The report also detailed the existence of housing discrimination in Louisiana and Mississippi by citing specific examples and highlighting policy trends that were aimed at enforcing racial segregation.<sup>34</sup>

In 2007, the Greater New Orleans Fair Housing Actions Center conducted a fair housing study, to uncover possible housing discrimination in Jefferson, St. Tammany, Orleans and St. Bernard Parishes. The study, entitled "For Rent, Unless You're Black," utilized paired testers, who were grouped together based on income, career path, family type and rental histories. The only characteristic varying between the testers was race. Forty housing providers were tested for racial discrimination. Types of discrimination included differences in accessing appointments to view units, differences in information regarding availability of units, differences in access to applications and differences in terms and conditions. The study recommended fair housing be a primary component in the rebuilding process, funding for fair housing enforcement be increased, business owners and developers be involved to combat discrimination, and private fair housing initiatives be expanded within the state of Louisiana.<sup>35</sup>

The Urban Institute was commissioned in 2007 by the Louisiana Family Recovery Corps to draft a report that would recommend promising programs and practices that would expand the affordable rental housing market. While this report focused on the broader issues of affordable housing, it also highlighted the adverse effects racial discrimination imposes on the affordable rental market. Fair housing issues were cited as a primary barrier to maximizing the potential of housing vouchers in the post-Katrina affordable housing rental market. The study also noted that the Housing Choice Voucher program results in lower housing cost burdens, better housing conditions and better neighborhood environments, however residents who receive vouchers are often unable to find qualifying houses and discrimination keeps voucher recipients from moving to communities of opportunity. The report recommended vigorous fair housing enforcement, as displaced families have encountered discrimination when attempting to secure housing. The authors noted that not only would more enforcement decrease discrimination against individuals in a protected class, it would also increase the effectiveness of housing vouchers, enabling lower income minorities to find secure affordable housing.<sup>36</sup>

In 2007, a report was presented by members of Advocates for Environmental Human Rights and Peoples' Hurricane Relief Fund to the United Nations' Committee for the Elimination of Racial Discrimination, claiming systematic discrimination against African

<sup>&</sup>lt;sup>33</sup> http://www.centerforsocialinclusion.org/PDF/racetorebuild.pdf.

<sup>&</sup>lt;sup>34</sup> http://www.aclu.org/files/pdfs/prison/brokenpromises\_20070820.pdf

<sup>&</sup>lt;sup>35</sup> http://www.gnofairhousing.org/pdfs/GNOFHAC%202007%20Rental%20Audit.pdf

<sup>&</sup>lt;sup>36</sup> http://www.urban.org/UploadedPDF/411514\_affordable\_rental\_housing.pdf

Americans by the federal government's reconstruction policies. The U.S. Department of Housing and Urban Development contracted with private developers to demolish 70 percent of public housing, residents of which were nearly all black. The report claimed many public housing units suffered little or no damage from the hurricane. The approved redevelopment plans included building a golf course and market rated housing units. As a result, the number of low-income apartments fell from 896 to 276 units in the Lafitte housing development, from 1,436 to 160 units in the St. Bernard housing development, from 1,550 to 154 units in the B.W. Cooper housing development and from 723 to 154 units in the C.J. Peete housing development. This situation created a housing crisis for approximately 5,000 black families.<sup>37</sup>

Policy Link issued a report in 2008 which reviewed the housing recovery process made by the state of Louisiana and evaluated the progress of major federally-funded recovery initiatives, such as the Large and Small Rental Repair programs and the homeowners Road Home program. The report highlighted the large scale displacement of many residents and the inadequate funds offered to rebuild the housing stock within New Orleans. While the majority of Road Home applicants received on average \$35,000 less than the amount required to fix their home, 60 percent of the applicants in the predominately African American neighborhoods of New Orleans East and the Lower 9th Ward had gaps over \$40,000. The report also highlighted the plight of renters. In hurricane affected areas, only two in five affordable damaged rental units were repaired or replaced with government assistance funds. In New Orleans, around one in three received recovery assistance. Of the 24,600 rental homes that received assistance, only 2,600 were available for occupancy. Because a large majority of African-Americans were renters, this placed a disproportionate share of the rental housing crisis on the African-American population.<sup>38</sup>

In 2008, the National Commission on Fair Housing issued its report on the current state of fair housing throughout the country and in regions affected by Hurricane Katrina. Through sworn testimony, the commission reported the failure to bring fair housing cases arising out of the aftermath of the catastrophe, citing discrimination to those seeking to relocate, discrimination on Internet sites offering housing for hurricane victims and discriminatory opposition to desperately needed affordable housing projects. The commission also identified specific cases of discrimination within a number of Louisiana's communities. For example, St. Bernard parish made it illegal for an owner of a single-family home, of which 93 percent are white, to rent to anyone not a blood relative. Also, lefferson Parish passed a resolution prohibiting Low Income Tax Credit Housing within its borders, limiting the availability of affordable housing in the area, thus discouraging the immigration of residents from the adjacent Lower Ninth Ward, who are predominantly black. Additionally, Kenner City, which sits within Jefferson Parish, took similar measures and imposed a moratorium on the construction of multi-family housing seeking to stop the development of affordable housing designed to alleviate the housing needs of minority populations.<sup>39</sup>

A December 2008 report suggested that Hurricane Katrina led to an increase in housing complaints filed in Louisiana, particularly in Baton Rouge. According to the Greater New

<sup>&</sup>lt;sup>37</sup> http://www.ehumanrights.org/docs/Katrina%20CERD%20Shadow%20Report.pdf

<sup>&</sup>lt;sup>38</sup> http://www.cwsworkshop.org/katrinareader/files/equityatlas.pdf

<sup>&</sup>lt;sup>39</sup> http://www.nationalfairhousing.org/Portals/33/reports/Future\_of\_Fair\_Housing.PDF

Orleans Fair Housing Action Center, housing complaints from 2005 to 2008 greatly increased after the storms. For example, the Center noted that after the storms in 2005, more renters complained of rental housing advertised on the internet that discriminated against certain races or religions.<sup>40</sup>

In 2009, the Greater New Orleans Fair Housing Action Center released findings from an audit which showed that housing being built in the New Orleans area often failed to meet modification standards for persons with disabilities. Despite the fact that the Federal Housing Act requires apartment complexes with more than four units to properly modify a certain number of units for persons with disabilities, the Center found that of 19 apartment units constructed since Hurricane Katrina most lacked proper modifications, including tub or shower adaptation, widened doorways, and light and power switch access. The authors of the report noted that many times disability discrimination of this type is not reported because it does not directly affect or hurt an individual. However, the report indicated that this type of discrimination does indeed hinder those with disabilities from having freedom of housing choice, particularly in metropolitan areas.<sup>41</sup>

## **RELATED STATEWIDE FAIR HOUSING CASES**

In 2005, a case of racial discrimination in the rental market was settled. The case involved a white woman and her black husband who sought an apartment in Metairie and were told by a landlord that he only rented units to single, white persons. The complaint was filed with the Greater New Orleans Fair Housing Action Council and then investigated by the same organization. Through testing activities, it was found that the landlord participated in patterns of discrimination based on gender, race and national origin. The landlord was fined \$9,000 and was required to adopt non-discriminatory practices in future leasing policies.<sup>42</sup>

A lawsuit was filed against the city of Denham Springs in 2005 in response to the city's refusal to allow persons with mental disabilities to utilize a group home building in the city. The lawsuit was filed on behalf of Options Foundation, Inc., an organization that planned to utilize a building, formerly a halfway house, to house persons with mental disabilities. The lawsuit alleged that the city was acting against the guidelines of the Fair Housing Act when it prevented mentally disabled persons who had been displaced by Hurricane Katrina from living in the building. Options, Inc, was granted a restraining order against the City as a result of this suit.<sup>43</sup>

In 2005, a complaint was filed by the Greater New Orleans Fair Housing Action Center (FHAC) against numerous housing Web sites that allowed discriminatory advertisements for housing to be posted. According to the GNOFHAC Web site, sites such as katrinahousing.org, katrinahome.com, and nolahousing.org, violated the Fair Housing Act when they published advertisements that noted preferences for tenants based on sex, national origin, religion, familial status and race. The complaint requested that the administrators of the Web sites remove all discriminatory advertising and enforce policies

<sup>&</sup>lt;sup>40</sup> http://www.2theadvocate.com/news/36281719.html

<sup>&</sup>lt;sup>41</sup> http://www.nola.com/news/t-p/neworleans/index.ssf?/base/news-10/1242969648315340.xml&coll = 1

<sup>&</sup>lt;sup>42</sup> http://gnofairhousing.org/pdfs/04-11-05-pressrelease-Spiller.pdf

<sup>&</sup>lt;sup>43</sup> http://gnofairhousing.org/pdfs/12-13-05-Press\_release\_Denham\_Springs%20Suit.pdf

that encourage non-discriminatory advertising for housing, including filtering future advertisements to prevent discriminatory postings from being published.<sup>44</sup>

A lawsuit was filed in 2006 against the Housing Authority of New Orleans and River Gardens apartment managers on the grounds that the organizations gave preferential housing placement to employees and other persons. The suit alleged that the organizations violated an agreement that would have allowed tenants of the St. Thomas public housing complex to be relocated to the River Gardens public housing complex after demolition of St. Thomas. The suit was filed after a former tenant of St. Thomas was continually refused housing at River Gardens for more than one year, while other less qualified persons were given housing at River Gardens. Part of the lawsuit was settled in 2006 when the individual was ultimately offered housing in one of the housing authority's public housing sites.<sup>45</sup> The remaining portions of the suit were settled in 2007, with the Housing Authority of New Orleans and River Gardens managers being required to uphold their previous agreement and offer housing at River Gardens to all former tenants of the St. Thomas complex.<sup>46</sup>

In 2008, the Kenner city council was accused of violating the Fair Housing Act when it enacted a yearlong ban on the development of multi-family housing units, or any housing with five or more units. The complaint alleged that the city council effectively banned housing for families with children, persons with disabilities and ethnic and racial minorities, all of which are considered protected classes under federal fair housing laws.<sup>47</sup>

In 2008, St. Bernard Parish was ordered to pay nearly \$33,000 in the settlement of a housing discrimination lawsuit. The lawsuit was filed in response to an ordinance created by the parish council in 2006 that required persons wishing to rent single-family homes to anyone other than a blood relative to seek approval by the council. While the Parish argued that the ordinance was to promote home ownership, housing advocates argued that the ordinance would prevent non-whites and those with lower incomes from living in the parish. In the settlement, the Parish was required to pay \$20,000 to the Fair Housing Action Center and \$12,500 to the landowner who challenged the ordinance.<sup>48</sup> However, in 2009, St. Bernard Parish was found in contempt of the consent decree reached in the 2008 settlement when it adopted an ordinance restricting the development of multi-family units. According to the lawsuit, a moratorium was placed on the construction of multifamily units in 2008. The parish claimed that the ordinance was designed to protect property values, while housing advocates argued that it prevented the development of a \$60 million mixed-income apartment complex in Chalmette that would have aided racial and ethnic minorities in finding affordable housing. In the ruling, the Parish was ordered to abandon its moratorium on multi-family unit development and to pay all legal fees associated with the trial, which totaled more than \$150,000.49

In 2009, HUD filed charges against Metairie Towers Condominium Association, Inc. based on disability discrimination and failure to make reasonable accommodation. According to

<sup>&</sup>lt;sup>44</sup> http://gnofairhousing.org/pdfs/12-22-05-Press\_release\_Advertising\_complaints.pdf

<sup>&</sup>lt;sup>45</sup> http://gnofairhousing.org/pdfs/12-05-06-RiverGardenPressRelease.pdf

<sup>&</sup>lt;sup>46</sup> http://gnofairhousing.org/07-09-07-HRIsettlement.htm

<sup>&</sup>lt;sup>47</sup> http://www.nola.com/news/t-p/frontpage/index.ssf?/base/news-28/120789128927440.xml&coll = 1

<sup>&</sup>lt;sup>48</sup> http://www.nola.com/news/t-p/frontpage/index.ssf?/base/news-2/1204093284207510.xml&coll = 1

<sup>&</sup>lt;sup>49</sup> http://www.nola.com/news/t-p/stbernard/index.ssf?/base/news-3/1248412977106510.xml&coll = 1

the charge, the respondent failed to acknowledge or allow numerous reasonable accommodation requests made by the disabled complainant. The severely deaf complainant had made several requests to be allowed to own service animals to let her to live independently, but the requests were repeatedly denied or ignored. The complainant was ultimately asked by the office to remove the pets or face eviction. The charge was filed after HUD investigated two complaints submitted by the alleged victim and found evidence of reasonable cause. The first complaint was filed with HUD in 2006 and alleged that the respondent had discriminated against the complainant based on disability. The second complaint was filed in 2007 and alleged that the respondent had retaliated against the complainant after the previous complaint was filed.<sup>50</sup>

## **RELATED U.S. DEPARTMENT OF JUSTICE CASES**

Under the Fair Housing Act, the U.S. Department of Justice (DOJ) may bring 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, the DOJ may institute criminal proceedings.
- Where people 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. The DOJ brings suits on behalf of individuals based on referrals from HUD.

The following narrative provides a brief summary of recent U.S. DOJ cases in Louisiana as noted on the U.S. DOJ Web site:

In March 2005, the Department of Justice reached a settlement to resolve allegations of discrimination against black tenants in more than 120 apartments in St. Bernard Parish. The lawsuit was brought about after testing conducted by the DOJ showed that apartment managers and owners in the area lied about the availability of units to potential black tenants, steered potential black tenants to certain complexes, and discouraged potential black tenants from renting through the company. The penalties include \$60,000 to be paid to the victims of the lawsuit, \$10,000 to the community to provide fair housing training, as well as \$100,000 to be paid to the government as civil penalties.<sup>51</sup>

A case from May 2008 documented that a couple was sued by the DOJ after interfering with the sale of a home based on the race of the potential buyers. According to the report, the couple made threats to the sellers of a home after learning that the potential buyers were black. This ultimately caused the potential buyers to retract their offer. As a result of the case, the couple was required to pay penalties to the potential buyers in addition to civil penalties.<sup>52</sup>

A DOJ case regarding familial discrimination in Lafayette was resolved in September 2008. According to the report, the owner and the manager of an apartment complex in the city

<sup>&</sup>lt;sup>50</sup> http://portal.hud.gov/portal/page/portal/HUD/documents/MetairieTowersRedactedCharge.pdf

<sup>&</sup>lt;sup>51</sup> http://www.usdoj.gov/opa/pr/2005/March/05\_crt\_153.htm

<sup>&</sup>lt;sup>52</sup> http://www.usdoj.gov/opa/pr/2008/May/08\_crt\_447.html

were accused of discouraging families with children from renting apartment in a complex and also refusing to rent certain apartment units to families with children. The complaint was investigated through DOJ testing. The owner and the manager of the complex were required to pay nearly \$150,000 in compensation and civil penalties and undergo training in fair housing laws, record keeping and non-discrimination policies.<sup>53</sup>

# HOUSING COMPLAINTS

#### COMPLAINTS FILED WITH THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

HUD maintains records of all complaints filed with the agency that represent alleged violations of federal housing law. Data on fair housing complaints filed within the state were requested from HUD in mid-July 2009 and were received in August. The data set included a record of each complaint received, along with the basis of the complaint, the alleged discriminatory activity or activities, and the outcome of the investigation undertaken.

Table 5.1 presents the total number of complaints received by HUD in Louisiana. More than 1,200 complaints were filed in the state between January 2000 and June 2009.

Table 5.2 shows data on the basis of the complaints, or what type of protections were involved in the case; each complaint that is submitted can be filed under more than

Table 5.1       Complaints by Entitlement       State of Louisiana       HUD Data, 2000 – 6/2009	nt
Entitlement	Total
City of Alexandria	17
City of Bossier City	23
East Baton Rouge Consolidated Area	134
Houma-Terrebonne Consolidated Area	12
Jefferson Parish	139
City of Kenner	23
Lafayette Consolidated Area	67
City of Lake Charles	31
City of Monroe	24
City of New Orleans	253
City of Shreveport	62
City of Slidell	21
City of Thibodaux	5
Balance	399
Total	1,210

one basis. So while 1,210 complaints were filed, a total of 1,610 bases were cited, most commonly for race and disability, followed by family status and sex.

					able 5.2						
Fair Housing Complaints by Basis											
State of Louisiana HUD Data, 2000 – 6/2009											
Year	2000	2001	2002	2003	<b>2000</b> - <b>2004</b>	<b>2009</b>	2006	2007	2008	2009	Total
Race	94	93	80	92	113	102	85	79	54	13	805
Disability	28	29	53	31	39	60	23	35	16	6	320
Family Status	20	17	16	53	28	25	23	18	15	2	217
Sex	18	12	6	23	17	24	11	16	11		138
Retaliation	3	5	6	2	3	5	4	4	2		34
Harassment	6	1	1	9	3	5	3	2	1		31
National Origin	2	3	4			6	5	2	2		24
Religion	2		2	2	1	1	3	4	3		18
Other Origin	2	3	2		2	4	1		1		15
Color				3	1	1		2	1		8
Total Basis	175	163	170	215	207	233	158	162	106	21	1,610
Total Complaints	132	137	123	134	175	163	124	118	85	19	1,210

<sup>53</sup> http://www.usdoj.gov/opa/pr/2008/September/08-crt-869.html

Table 5.3 shows these housing complaints segmented by issue, or type of discriminatory action reported. The majority of the complaints related to discrimination in terms and conditions in the rental market and refusal to rent.

Table 5.3     Fair Housing Complaints by Issue     State of Louisiana     HUD Data, 2000 – 6/2009											
Issue	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	Total
Discrimination in terms/conditions/privileges in rental	51	28	19	47	77	84	49	52	25	3	435
Discriminatory terms, conditions, privileges services etc.	13	38	34	22	38	32	46	33	35	12	303
Discriminatory refusal to rent and negotiate for rental	18	13	9	20	37	33	23	17	16	1	187
Discriminatory refusal to rent	9	13	8	8	21	24	25	32	17	8	165
Discriminatory acts under Section 818 (coercion, etc.)	28	12	4	12	25	28	13	20	12	1	155
Other discriminatory acts	2		44	39				2	2		89
Failure to make reasonable accommodation	11	5	8	8	14	14	7	10	8	2	87
False denial or representation of availability - rental	5	8	3	4	6	10	7	3	3		49
Discrimination in terms/conditions/privileges in sale	4	5	3	5	5	14	5	4	2		47
Otherwise deny or make housing available			1	33		1	7		4		46
Discriminatory financing (eg. real estate transactions)	6	6	5	7	6	8	1	1	3		43
Discriminatory refusal to sell and negotiate for sale	5	9	2	2	6	6	4	2	2		38
Discriminatory advertising, statements and notices	7	4	3	5	6	5	1	4	1		36
Discrimination in the terms or conditions for making loans	2	2	1	6	4	2	2	4	2		25
Discriminatory refusal to negotiate for rental	5			2	7	2	3	1		1	21
Using ordinances to discriminate in zoning and land use		1		1	1		3	3	6		15
Discrimination in the selling of residential real property		4	1		3		4	1	1		14
Steering	1	2	1	3	1	3	2			1	14
Discrimination in services and facilities relating to rental	2	1			1	4	3	2			13
Discrimination in making of loans	3	3	2			2		2			12
Failure to permit reasonable modification	1	4		1	1			1	1		9
Discriminatory advertisement - rental		1		4	1	1					7
Discriminatory refusal to sell	1	3	1		1		1				7
False denial or representation of availability	1		1	3	1				1		7
Refusing to provide municipal services or property	1				2		1	1			5
Adverse action against an employee				1		2		1			4
Discriminatory refusal to negotiate for sale	1	2							1		4
Discriminatory brokerage service	1					1	1				3
False denial or representation of availability - sale		1			2						3
Restriction of choices relative to a rental				1			2				3
Complaint withdrawn by complainant after resolution			1			1					2
Discrimination in services and facilities relating to sale					1	1					2
Discrimination in appraising of residential real property	1		1								2
Redlining	1					1					2
Refusing to provide insurance	1			1							2
Complaint withdrawn by complainant after resolution	1										1
Total	182	165	152	235	267	279	210	196	142	29	1,857

Table 5.4. presents the closure status of these complaints. A total of 553 complaints were found to have a "no cause determination," meaning that discrimination was not found. An

additional 319 complaints were settled successfully, and 119 complaints were closed when the complainant failed to cooperate.

Table 5.4     Fair Housing Complaints by Closure     State of Louisiana     HUD Data, 2000 – 6/2009											
Closure	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	Total
No cause determination	69	80	58	53	75	73	52	46	39	8	553
Conciliation/settlement successful	26	25	16	43	57	48	36	38	26	4	319
Complainant failed to cooperate	6	9	8	23	14	13	12	17	12	5	119
Complaint withdrawn by complainant after resolution	10	7	4	3	7	14	11	6	4	2	68
Complaint withdrawn by complainant w/out resolution	7	7	13	5	9	9	7	7	1		65
Dismissed for lack of jurisdiction	9	2	23	3	5	4		2	1		49
Unable to locate complainant	2	6	1	2	6	2	3				22
FHAP judicial consent order				1			1	1			3
Untimely filed				1			2				3
Administrative hearing ended - discrimination found								1	1		2
Closed because trial has begun	1				1						2
FHAP judicial dismissal	2										2
DOJ dismissal		1									1
Election made to go to court					1						1
Litigation ended - discrimination found									1		1
Case still open											
Election made to go to court											
No information provided											
Total	132	137	123	134	175	163	124	118	85	19	1,210

#### COMPLAINTS FILED WITH THE LOUISIANA DEPARTMENT OF JUSTICE

As a substantially equivalent agency, the Louisiana Department of Justice (LDOJ) also accepts fair housing complaints within the state. A tabulation of complaints was received from the LDOJ. However, this data set lacked detailed information about the specific geographic area of alleged discriminatory activities.<sup>54</sup> Complaints from the LDOJ were provided from 1999 through October 2009.

Table 5.5 presents the number of fair housing complaints received by the LDOJ from January 1999 through October 2009 by parish. Orleans Parish showed the highest number of complaints received during this time period, followed by Jefferson Parish, East Baton Rouge Parish and Lafayette Parish.

Table 5.5     Fair Housing Complaints by Parish     State of Louisiana     Louisiana Department of Justice, 1999 – 10/2009						
Parish	Total					
Orleans Parish	208					
Jefferson Parish	160					
East Baton Rouge Parish	136					
Lafayette Parish	42					
St. Tammany Parish	36					
Calcasieu Parish	29					
Bossier Parish	25					
Ouachita Parish	20					
Rapides Parish	18					
Terrebonne Parish	11					
Lafourche Parish	3					
Balance	253					
Total	941					

<sup>&</sup>lt;sup>54</sup> Some data by parish was ultimately received, but not in a timely enough manner for inclusion in this report.

2010 Analysis of Impediments

Data on the basis of the fair housing complaints or type of discrimination of the LDOJ complaints are presented in Table 5.6. More than 1,100 bases were cited by complainants, with roughly half of these bases relating to race. Discrimination on the basis of handicap, familial status and sex were also frequently cited.

Table 5.7 presents the closure status of the complaints. Of the 951 fair housing complaints filed with the LDOJ, 453 were found to have a no cause determination. Conciliation was successfully achieved in 277 cases and 67 cases were closed when the complainant failed to cooperate.

Table 5.6Fair Housing Complaints by BasisState of LouisianaLouisiana Department of Justice,1999 – 10/2009						
Description	Total					
Race	643					
Handicap	162					
Familial Status	154					
Sex	102					
National Origin	39					
Religion	15					
Color	10					
Future Use	1					
Retaliation	0					
Total	1,126					

Table 5.7     Fair Housing Complaints by Closure     State of Louisiana     Louisiana Department of Justice, 1999 – 10/2009							
Year	Total						
No Cause Determination	453						
Conciliation successful	277						
Complainant Failed to cooperate	67						
Withdrawn by complainant without resolution	51						
Withdrawn by complainant after resolution	38						
Unable to locate complainant	25						
Dismissed for lack of jurisdiction	18						
Litigation ended - discrimination found	7						
ALJ dismissal	4						
Cased deferred back to HUD	4						
Discrimination found	3						
DOJ dismissal	3						
Unable to identify respondent	1						
Missing	0						
Total	951						

# FAIR HOUSING SURVEY

Additional evaluation of the fair housing profile was conducted via a survey of stakeholders, including individuals associated with minority organizations, fair housing groups, disability resource organizations, real estate and property management associations, banking entities and other persons involved in the housing arena. This stakeholder or expert community was chosen because, as a group, they should have a relatively solid understanding of the fair housing arena. The purpose of the survey was to gain a more qualitative analysis of the knowledge, experiences, opinions and feelings of stakeholders and other interested parties regarding fair housing, as well as to gauge the stakeholders' actual understanding of affirmatively furthering fair housing.

A total of 451 responses were received from stakeholders throughout the state of Louisiana. Table 5.8 presents the number of responses by entitlement.

Table 5.8     Responses by Entitlement     State of Louisiana     2009 Fair Housing Survey							
Entitlement	Total						
City of Alexandria	37						
City of Bossier City	4						
East Baton Rouge Consolidated Area	59						
Houma-Terrebonne Consolidated Area	18						
Jefferson Parish	61						
City of Kenner	2						
Lafayette Consolidated Area	70						
City of Lake Charles	20						
City of Monroe	7						
City of New Orleans	133						
City of Shreveport	9						
City of Slidell	11						
City of Thibodaux	11						
Balance of State	9						
Total	451						

Respondents were asked to identify their role in the housing industry. Results showed that most respondents were advocates, followed by concerned citizens, bank/financial service representatives, housing developers and program managers. These data are presented in Table 5.9.

The next series of questions on the survey were generally introductory in nature. First, respondents were asked to reply to whether the laws were found to be useful; if they were difficult to understand and whether there was a training process available to them in regard to fair housing law. Table 5.10 provides the responses to these questions. Some 319 individuals felt that fair housing laws were useful and 17 felt that they were not useful. More than 100 individuals admitted that they were difficult to understand, with 50 more not really sure if they were or were not easy to understand. This is a substantive portion of the stakeholder community that appears to not understand fair housing law.

Table 5.9       Primary Role in the Housing Industry       State of Louisiana						
2009 Fair Housi Role	ng Survey Total					
Advocate	62					
Concerned citizen	49					
Bank/financial services	42					
Housing developer	33					
Program manager	28					
Mortgage lending	20					
Education/educator	24 20					
	19					
Property management Other services	13					
Real estate agent	13					
Construction	12					
Business services	9					
Concerned Citizen	9					
Welfare services	5					
	4					
Building inspection Law/legal services	4					
Architect	4					
	3					
Financial management	2					
Program Manager Public safety	1					
	·					
Other (please specify)	93					
Missing	7					
Total	451					

Table 5.10     Fair Housing Needs Survey     State of Louisiana     2009 Fair Housing Survey								
Question	Yes	No	Don't Know	Missing	Total			
Federal, State and Local Fair Hou	using Lav	N						
Do these laws serve a useful purpose?	319	17	36	79	451			
Are fair housing laws difficult to understand or follow?	103	216	50	82	451			
Is there a training process available for you to learn about fair housing laws?	178	60	26	187	451			

Table 5.11 presents a tabulation of responses to three questions about whether the survey respondent had particular concerns or issues pertaining to fair housing in the state. While a number of people elected to not answer this question, of those that did, 165 expressed concerns about fair housing, 137 saw specific barriers or constraints to affirmatively furthering fair housing, and 128 more thought of specific areas that had fair housing problems.

Table 5.11     Fair Housing Needs Survey     State of Louisiana     2009 Fair Housing Survey								
Question	Yes	No	Don't Know	Missing	Total			
Fair Housing Issues								
Do you have concerns about fair housing in your community?	165	150	27	109	451			
Do you see barriers or constraints to affirmatively furthering fair housing?	137	136	64	114	451			
Are there geographic areas that have fair housing problems?	128	74	131	118	451			

The following presents a paraphrased list of the concerns, barriers and constraints most often cited by respondents.

- Lack of available, accessible and affordable housing,
- Discrimination in the rental markets especially on the basis of color,
- Lack of understanding of tenant rights and landlord responsibilities,
- Lack of education and outreach efforts pertaining to fair housing,
- Insufficient availability of information especially on government web sites,
- Lack of reporting of fair housing violations,
- Lack of enforcement of fair housing laws,
- Lack of required fair housing training,
- Lack of presence of a statewide agency dedicated to education, enforcement and outreach efforts,
- Mortgages difficult to obtain by certain races,
- Redlining and steering,
- Alleged use of zoning ordinances or regulations that restrict affordable housing development, including construction moratoriums,
- An overall lack of commitment to affirmatively furthering fair housing especially after Hurricane Katrina in both government and community decision making.

However, some of these concerns are not necessarily impediments to fair housing choice. The lack of available and affordable housing is an important housing planning issue. Furthermore, the quality of the relationships between landlords and tenants is also a housing consideration. However, these are not typically impediments to fair housing choice, as defined previously, unless the action is due to protected class status. Additional outreach and education about fair housing, affordable housing planning, and landlord/tenant responsibilities would help to better frame the three topics and assist in affirmatively furthering fair housing.

Table 5.12 presents responses related to state and local government policies or activities that might be contrary to affirmatively furthering fair housing. These four questions were asked in slightly different fashions; but they emphasized the following:

- 1. Taking planning, financing, or administrative action that adversely affects affirmatively furthering fair housing;
- 2. Awareness of non-compliance issues with any public housing authorities;
- 3. State or local codes, regulations, that may represent barriers to fair housing choice;
- 4. Public administrative actions or policies, including tax policy, that are barriers to fair housing choice.

While about 130 respondents did not answer these questions, and another 100 indicated that the did not know about these issue, between 30 and 55 typically expressed some concerns about public policy actions and issues adversely affecting affirmatively furthering fair housing. The following themes arose:

- Alleged use of zoning ordinances or regulations that restrict affordable housing development, including construction moratoriums, denial of proposed subdivisions, and lot size limitations.
- The potential existence of NIMBYism in development planning,
- Instances of householder ordinances, such as "Blood relative ordinances" or limiting the number of persons per household,
- Discrimination in the rental markets, including lack of reasonable accommodation and actions on the part of local housing authorities,
- Lack of enforcement of safety, health, and ADA codes,
- Lack of sufficient capacity to administer programs, including fair housing activities,
- Evidence of steering and redlining.

Table 5.12     Fair Housing Needs Survey     State of Louisiana     2009 Fair Housing Survey								
Question	Yes	No	Don't Know	Missing	Total			
State and Local Government Policies and Activities Related to Fair Housing								
Do you feel state or local government may have taken planning, financing or administrative action that may have adversely affected fair housing choice?	56	155	114	126	451			
Are you aware of any fair housing non-compliance issues with any public housing authorities?	32	193	98	128	451			
Can you think of any state or local codes or regulations, including building, occupancy, health or safety codes, that may represent barriers to fair housing choice?	44	167	111	129	451			
Can you think of any public administrative actions or policies, including tax policy, that may represent barriers to fair housing choice?	52	156	113	130	451			

Three more questions pertained to fair housing activities in the area. These questions asked whether the respondent was aware of any fair housing testing in the community, aware of a statewide fair housing plan, and whether the fair housing laws of Louisiana should be changed. The results are presented in Table 5.13

Table 5.13     Fair Housing Needs Survey     State of Louisiana     2009 Fair Housing Survey										
Question Yes No Don't Know Missing To										
Fair Housing Act	tivities									
Are you aware of any fair housing testing in your community?	54	198	69	130	451					
Are you aware of a statewide fair housing plan?	95	154	67	135	451					
Do the fair housing laws in your community need to be changed? 44 90 182 135 451										

More than 50 individuals were aware of any fair housing testing and almost 100 of the respondents were aware of a statewide fair housing plan. This means that at least some of the stakeholders were looking to the state for guidance in this arena. A total of 44 respondents felt that the fair housing laws in the state need to be changed.

Respondents were also asked: If someone came to them alleging to be a victim of a fair housing violation, to what individual or organization would they refer the alleged victim? Respondents were not consistent in their responses. As seen in Table 5.14, 171 respondents did not provide an answer and 31 respondents did not know, while 83 persons suggested HUD and 53 suggested the Greater New Orleans Fair Housing Action Center. In the state of Louisiana, the Louisiana Department of Justice is HUD's designated substantially equivalent agency and complainants should be referred to this entity. It appears that the expert community responding to the 2009 fair housing survey was not aware of this. Consequently, the referral system may not be working well.

Table 5.14     Fair Housing Referral     State of Louisiana     2009 Fair Housing Survey								
Suggested Referral	Total							
Missing	171							
HUD	83							
Other	54							
GNOFHAC	53							
Don't Know	31							
Legal Aid	14							
Housing Authority Community Development	13							
Department	11							
Attorney General Neighborhood Counseling	9							
Services	5							
Louisiana DOJ	5							
Mayor's Office	1							
ACORN	1							
Total	451							

One of the concluding questions on the survey pertained to whether the stakeholder perceived of sufficient fair housing outreach and education. As seen in Table 5.15 the findings demonstrated that some 76 respondents did not know if there is sufficient fair housing outreach and education, only 6 respondents felt that there is too much and another 178 felt that there is too little fair housing outreach and education.

Table 5.15     Fair Housing Needs Survey     State of Louisiana     2009 Fair Housing Survey										
Testing and Education										
Question	Too Little	Right Amount	Too Much	Don't Know	Missing	Total				
Is there sufficient outreach and education regarding affirmatively furthering fair housing?	178	60	6	76	131	451				
Is there sufficient testing in your community?	32	12	4	46	357	451				

# **SUMMARY**

## FAIR HOUSING STUDIES AND CASES

Several national fair housing studies revealed that, despite efforts to curb housing discrimination in the U.S., problems still exist in terms of discrimination against ethnic and racial minorities, discrimination against persons with disabilities, and residential segregation resulting from current fair housing efforts. National studies also revealed that there are problems with awareness of fair housing laws and protected classes.

A review of statewide fair housing studies and cases showed that the fair housing situation in Louisiana has been greatly affected by recent natural disasters, such as Hurricanes Katrina and Rita. Fair housing studies from the last five years showed that racial and ethnic minorities have faced discrimination in efforts to find housing in terms of discriminatory terms and conditions and advertising for rental properties. Additionally, several communities in the state enacted laws after the storms that may have encouraged residential segregation. Fair housing cases highlighted discrimination against persons with disabilities and ethnic and racial minorities.

#### FAIR HOUSING COMPLAINT DATA

Fair housing complaint data collected from the U.S. Department of Housing and Urban Development and the Louisiana Department of Justice showed that more than 1,200 complaints were filed in the state of Louisiana in the last nine to ten years. Most complaints were filed on the bases of race or disability and were either found to have no cause or were settled successfully.

#### FAIR HOUSING SURVEY DATA

A fair housing survey was conducted throughout Louisiana and showed that most respondents were aware of fair housing laws and find them easy to understand. Many respondents noted issues of government actions or policies representing barriers to fair housing or specific areas within the entitlement that have fair housing problems. There was also substantive confusion about the difference between affordable housing planning and production and landlord/tenant law and affirmatively furthering fair housing. Furthermore, respondents expressed concerns about discrimination in the rental markets as well as an overall lack of understanding of fair housing law. Respondents, who were supposed to represent an expert community, did not seem to fully be aware of the fair housing responsibilities of the Louisiana Department of Justice. Last, the majority of respondents noted that there is a lack of fair housing outreach and education efforts in their community.

# SECTION VI. IMPEDIMENTS AND SUGGESTED ACTIONS

#### **IDENTIFIED IMPEDIMENTS TO FAIR HOUSING CHOICE**

In 2009, a substantive analysis of impediments to fair housing choice was initiated statewide by the Louisiana Office of Community Development. Near the close of the calendar year, a strategy session was held in Baton Rouge with the Office and Community Development and participating entitlements throughout the state. The outcome of this strategy session was the identification of specific impediments or statewide concerns and a set of corresponding statewide fair housing actions directed toward mitigating, lessening or eliminating the identified impediments.

#### Impediments to Fair Housing Choice

#### Three Categories:

- A. Insufficient fair housing system capacity that limits access to the system and the ability to respond to fair housing needs.
- B. Insufficient or ineffective communication and coordination among agencies and those interested in affirmatively furthering fair housing.
- C. Lack of understanding of fair housing by both consumers and providers.

#### A. Insufficient Fair Housing System Capacity

- 1. Insufficient fair housing system capacity to respond to questions or concerns or to address fair housing needs (outside of New Orleans).
- 2. Lack of effective referral system, as interested persons are referred to many different places.
- 3. Poor documentation of fair housing activities or lack of interest in sharing information.
- 4. Alleged use of zoning and land use regulations to discriminate by units of local government.

#### B. Ineffective Communication and Coordination

5. Inadequate communication efforts between fair housing entities and agencies charged with affirmatively furthering fair housing.

#### C. Lack of Understanding of Fair Housing

- 6. Lack of sufficient fair housing outreach and education resulting in:
  - a. Lack of understanding of fair housing issues and knowledge of fair housing laws,
  - b. Confusion about the differences between fair housing, housing production planning, and landlord/tenant issues,
  - c. Insufficient interest in fair housing activities in some communities,
  - d. Lack of desire to affirmatively further fair housing, and

- e. Some local government actions may not be in the spirit of affirmatively furthering fair housing.
- 7. Lack of sufficient financial literacy resulting in:
  - a. Disproportionately high denial rates for racial and ethnic minorities,
  - b. Denial rates disproportionately high in lower-income areas, and
  - c. Originated high annual percentage rate loans targeted to minority areas.
- 8. Discrimination in rental markets.
- 9. Failure to make reasonable accommodation, particularly in rental markets.

## Suggested Actions to Consider

# Three Goals:

- A. Improve fair housing system capacity, access to system and ability to respond to needs.
- B. Improve communication and coordination among agencies and those interested in affirmatively furthering fair housing.
- C. Enhance understanding of fair housing by both consumers and providers.

## A. Improve Fair Housing System Capacity

- 1. Build additional fair housing system capacity.
  - a. Enhance departmental resources by acquiring seasoned and experienced personnel familiar with fair housing and affirmatively furthering fair housing.
  - b. Establish additional Fair Housing Initiative Program (FHIP) recipients in the state.
    - i. Provide technical assistance or other assistance to aid in creation of these entities, thereby providing better coverage in other areas of the state.
  - c. Establish the Louisiana Fair Housing Working Group (FHWG), a statewide entity charged with reviewing and setting statewide fair housing policy actions. The lead agency might best be one with ties throughout the state, such as the Louisiana Housing Finance Agency. The FHWG would:
    - i. Be comprised of individuals from entitlements and state agencies,
    - ii. Meet periodically with meeting locations rotating geographically,
    - iii. Offer oversight of statewide policies and actions,
    - iv. Include a budget for funding actions to occur,
    - v. Accept funding from everyone in the FHWG, such as through a percent of HUD formula allocation; funding could also come from contributions by private industry or other interested government agencies,
    - vi. Research and coordinate efforts to establish the FHWG as a non-profit entity so that private contributions could be tax deductible.
- 2. Develop consistent referral system and distribute to responsible agencies. This would:
  - a. Be created through decisions by the FHWG.
  - b. Streamline and condense referral system to fewer "doors" to improve access to the fair housing system.
- 3. Improve documentation of fair housing enforcement activities. The FHWG would recommend and set policy on fair housing reporting, such as:

- a. Better tracking number of cases and basis of complaint,
- b. Better tracking number and types of discriminatory issues, and
- c. Better facilitating record keeping for outreach, education, testing and enforcement activities.
- 4. Inform units of local government on what types of zoning and land use regulations might be construed to be discriminatory.
  - a. The FHWG would study and make specific recommendations.
  - b. The FHWG would conduct research to uncover best practices.

#### B. Increase Communication and Coordination

- 5. Improve communication between fair housing agencies and agencies charged with affirmatively furthering fair housing.
  - a. The FHWG should coordinate an inter-agency approach including all entitlements, Louisiana Department of Justice, Louisiana Housing Finance Agency.
  - b. Members of the FHWG should share experiences of fair housing entities, set schedule of actions and make recommendations.
  - c. The FHWG should review prospective communication barriers and why they are occurring, including suggesting methods for improvement of both reporting and communication.

#### C. Enhance Understanding of Fair Housing for Both Consumers and Providers

- 6. Enhance fair housing outreach and education for both consumers and providers.
  - a. Improve understanding of fair housing and fair housing law by:
    - i. Conducting public educational or public relations activities such as holding web-based seminars, outreach seminars and other teaching and instructional actions or tools for enhancing understanding of fair housing law.
    - ii. Creating learning opportunities, especially for selected groups.
  - b. Lessen or eliminate confusion between fair housing, planning for affordable housing production, and landlord tenant issues. The FHWG would draft a policy statement illuminating the differences between these issues.
  - c. Advise units of local government about responsibilities pertaining to fair housing and which land use policies may be construed to be discriminatory.
  - d. Encourage both entitlement and non-entitlement communities to affirmatively further fair housing by:
    - i. Researching and preparing examples of best practices,
    - ii. Researching and preparing prospective liabilities documented in case history.
- 7. Enhance the financial literacy of Louisiana residents, by
  - a. Enhancing first-time homebuyer education courses.
  - b. Enhancing consumer understanding and knowledge of credit, how to obtain and keep good credit, through public service ads, web-based seminars, and other outreach and education activities.
  - c. These steps will result in:

- i. Reducing disproportionately high denial rates.
- ii. Reducing concentration of denial rates in selected lower-income areas.
- iii. Reducing or eliminating targeting of high annual percentage rate loans. For these three items:
- d. Track future HMDA data for progress toward these goals.
- 8. Reduce or eliminate discrimination in rental markets.
  - a. Contact property management firms, associations, and landlords and reach out to them for enhancing understanding of fair housing law.
  - b. Prepare lists of best and worst practices, liabilities and lessons learned, and share this with the property management firms, associations, and landlords.
- 9. Encourage rental managers to accept requests for reasonable accommodation.
  - a. Communicate with rental managers to advise them of responsibilities pertaining to reasonable accommodation.
  - b. Conduct audit testing of newly constructed rental properties to measure compliance with current fair housing law and the Americans with Disabilities Act.

#### Suggested Two-Year Fair Housing Action Plan

The state of Louisiana has 14 HUD-designated entitlement communities, with the Louisiana Office of Community Development and the Louisiana Housing Finance Authority being the HUD grantees for the balance of the state. To better and more effectively affirmatively further fair housing, each of these government entities should consider taking the following actions:

- 1. Form a working group that will have the authority to determine, fund and take specific actions to affirmatively further fair housing throughout the state. This group will be identified by the end of December 2010.
  - a. During the July 1 through December 31, 2010 time period the group will accomplish the following:
    - i. Elect chair, vice chair and treasurer for the group;
    - ii. Determine meeting schedule and frequency, such as monthly or quarterly, as well as the location parameters, such as rotating locations or fixed locations;
    - iii. Prepare a list of fair housing activities to be undertaken, such as outreach and education, audit testing, or fair housing documentation procedures;
    - iv. Prepare a set of draft RFPs to be released that will hire contractors to conduct the fair housing activities. Each will have specific measurement criteria so that fair housing activities that are undertaken can be measured;
    - v. Invite the Louisiana Department of Justice to participate in affirmatively furthering fair housing and in the operation of the working group;
    - vi. Develop a consistent fair housing referral system and distribute to all group members and have the members distribute this within their own communities.
  - b. During the January 1, 2011 through June 30, 2011 time period, accomplish the following organizational and activity objectives:
    - i. Determine which entitlement or work group participant is to be the fiscal agent;

- ii. Sign contracts with the fiscal agent and the fiscal agent signs contracts with the working group participants;
- iii. Determine the precise CPD allocation percent that will represent the funding source. This represents a uniform portion or share of the HUD CPD allocation received by each of the participants;
- iv. Send allocations to fiscal agent;
- v. Finalize the RFP documents and release the RFPs for bid.
- c. During the second year of the existence of the working group the following actions should be considered:
  - i. Elect a new chairman, vice chair and treasurer;
  - ii. Determine meeting schedule and frequency, such as monthly or quarterly, as well as the location parameters, such as rotating locations or fixed locations;
  - iii. Select contractors to conduct the bid fair housing activities and initiate all projects;
  - iv. Have the treasurer initiate payments to the selected contractors;
  - v. Have the treasurer research the feasibility of converting the working group to a non-profit corporation, with the participants as members and without any payroll. This will allow private companies to contribute tax-deductable contributions to the fair housing organization;
  - vi. Determine if non-profit status will be beneficial for the group;
  - vii. Prepare a list of fair housing activities to be undertaken during the upcoming year, such as outreach and education, audit testing, or fair housing documentation procedures;
  - viii. Send fiscal agent budget allocations;
  - ix. Issue a progress review document that evaluates the contracted fair housing activities for effectiveness;
  - x. Revise or enhance the description of fair housing activities to be conducted in the next year;
  - xi. Determine the precise CPD allocation percent that will represent the funding source. This represents a uniform portion or share of the HUD CPD allocation received by each of the participants;
  - xii. Finalize the RFP documents and release the RFPs for bid;
  - xiii. Decide on fair housing contractors to be used for the second round of Louisiana fair housing activities.

# APPENDIX A. ADDITIONAL CENSUS DATA

Table A.1     Population by Ethnicity     State of Louisiana     2000 Census SF1 Data											
Entitlements	Hispanic	Non- Hispanic	Total Population	Percent Hispanic							
Alexandria	456	45,886	46,342	0.98%							
East Baton Rouge	6,913	353,191	360,104	1.92%							
Bossier City	2,232	54,229	56,461	3.95%							
Houma-Terrebonne	1,631	102,872	104,503	1.56%							
Kenner	9,602	60,915	70,517	13.62%							
Lafayette	3,320	187,183	190,503	1.74%							
Lake Charles	1,007	70,750	71,757	1.40%							
Monroe	534	52,573	53,107	1.01%							
New Orleans	14,826	469,848	484,674	3.06%							
Shreveport	3,106	197,039	200,145	1.55%							
Slidell	687	25,008	25,695	2.67%							
Thibodaux	148	14,283	14,431	1.03%							
Jefferson Parish	32,418	423,048	455,466	7.12%							
Balance of State	40,460	2,365,328	2,405,788	1.68%							
Total	107,738	4,361,238	4,468,976	2.41%							

\*Table does not sum to total. Jefferson Parish estimates include the city of Kenner.

Table A.2     Group Quarters Population     State of Louisiana     2000 Census SF1 Data												
Entitlements	Correctional Institutions	Instit Nursing Homes	tutionalized Other Institutions	Total Institutionalized Population	College Dormitories	Non Military Quarters	institutionalized Other Noninstitutional Group Quarters	Total Noninstitutional Population	Total Population in Group Quarters			
Alexandria	411	761	109	1,281	0	0	501	501	1,782			
East Baton Rouge	1,740	2,169	1,042	4,951	7,697	0	1,544	9,241	14,192			
Bossier City	28	569	255	852	0	791	52	843	1,695			
Houma-Terrebonne	540	522	180	1,242	0	0	171	171	1,413			
Kenner	0	414	23	437	0	0	261	261	698			
Lafayette	901	1,220	141	2,262	1,803	0	784	2,587	4,849			
Lake Charles	980	820	408	2,208	1,033	0	329	1,362	3,570			
Monroe	211	714	448	1,373	1,944	0	389	2,333	3,706			
New Orleans	6,160	2,976	636	9,772	4,731	255	2,883	7,869	17,641			
Shreveport	1,210	1,979	287	3,476	766	0	1,149	1,915	5,391			
Slidell	19	305	0	324	0	0	23	23	347			
Thibodaux	22	205	82	309	744	0	81	825	1,134			
Jefferson Parish	691	1,907	442	3,040	0	39	1,278	1,317	4,357			
Balance of State	36,941	17,374	4,597	58,912	8,241	2,792	5,943	16,976	75,888			
Total	49,854	31,521	8,627	90,002	26,959	3,877	15,127	45,963	135,965			

\*Table does not sum to total. Jefferson Parish estimates include the city of Kenner.

# APPENDIX B. ADDITIONAL HMDA DATA

Table B.1       Owner-Occupied Home Purchase Loan Applications by Loan Type       State of Louisiana       HMDA Data 2002 - 2007										
Loan Type	2002	2003	2004	2005	2006	2007	Total			
Conventional	68,602	76,479	95,146	115,752	124,853	98,251	579,083			
FHA - Insured	17,624	16,514	14,363	11,970	11,252	9,225	80,948			
VA - Guaranteed	3,743	4,168	3,777	3,729	3,445	3,351	22,213			
Rural Housing Service or Farm Service Agency	1,089	1,761	1,784	1,774	1,627	2,711	10,746			
Total	91,058	98,922	115,070	133,225	141,177	113,538	692,990			

			0A Data 200	2 - 2001				
Race		2002	2003	2004	2005	2006	2007	Total
	Originated	183	205	222	226	193	182	1,211
American Indian or Alaskan Native	Denied	82	118	136	142	115	96	689
	Denial Rate %	30.9%	36.5%	38.0%	38.6%	37.3%	34.5%	36.3%
	Originated	693	770	1,123	1,049	1,212	1,025	5,872
Asian or Pacific Islander	Denied	103	160	226	275	282	231	1,277
	Denial Rate %	12.9%	17.2%	16.8%	20.8%	18.9%	18.4%	17.9%
	Originated	6,572	7,487	9,337	10,703	11,253	8,620	53,972
Black	Denied	4,690	4,329	5,252	6,723	6,511	5,472	32,977
	Denial Rate %	41.6%	36.6%	36.0%	38.6%	36.7%	38.8%	37.9%
Hispanic (Race)	Originated	880	1,069					1,949
	Denied	244	294					538
	Denial Rate %	21.7%	21.6%	•	•			21.6%
White	Originated	32,964	37,485	39,489	45,098	46,973	37,315	239,32
	Denied	8,877	9,113	9,859	12,251	12,073	10,161	62,334
	Denial Rate %	21.2%	19.6%	20.0%	21.4%	20.4%	21.4%	20.7%
	Originated	422	453					875
Other	Denied	87	135					222
	Denial Rate %	17.1%	23.0%	•	•	-		20.2%
	Originated	4,143	3,325	3,568	4,014	5,623	3,789	24,462
Not Provided by Applicant	Denied	3,628	1,998	2,359	2,472	3,140	1,967	15,564
Applicant	Denial Rate %	46.7%	37.5%	39.8%	38.1%	35.8%	34.2%	38.9%
	Originated	180	152	156	14	20	24	546
Not Applicable	Denied	72	4	37	6	1	3	123
	Denial Rate %	28.6%	2.6%	19.2%	30.0%	4.8%	11.1%	18.4%
	Originated	46,037	50,946	53,895	61,104	65,274	50,955	328,21
Total	Denied	17,783	16,151	17,869	21,869	22,122	17,930	113,72
	Denial Rate %	27.9%	24.1%	24.9%	26.4%	25.3%	26.0%	25.7%
	Originated			1,415	1,585	1,854	1,334	6,188
Hispanic (Ethnicity)	Denied			508	626	615	521	2,270
	Denial Rate %			26.4%	28.3%	24.9%	28.1%	26.8%

Owner-Occ	Table B.3       Owner-Occupied Home Purchase Loan Applications by Selected Action Taken by Gender       State of Louisiana       HMDA Data 2002 - 2007												
Gender		2002	2003	2004	2005	2006	2007	Total					
	Originated	31,170	35,143	36,787	41,099	43,971	34,870	223,040					
Male	Denied	9,252	9,379	10,518	12,871	12,956	10,607	65,583					
	Denial Rate %	22.9%	21.1%	22.2%	23.8%	22.8%	23.3%	22.7%					
	Originated	11,831	13,852	15,699	18,042	18,811	14,427	92,662					
Female	Denied	5,358	5,453	6,259	7,882	7,718	6,242	38,912					
	Denial Rate %	31.2%	28.2%	28.5%	30.4%	29.1%	30.2%	29.6%					
	Originated	2,952	1,809	1,371	1,949	2,474	1,626	12,181					
Not Provided by Applicant	Denied	3,122	1,316	1,089	1,111	1,447	1,078	9,163					
by Applicant	Denial Rate %	51.4%	42.1%	44.3%	36.3%	36.9%	39.9%	42.9%					
	Originated	84	142	38	14	18	32	328					
Not Applicable	Denied	51	3	3	5	1	3	66					
	Denial Rate %	37.8%	2.1%	7.3%	26.3%	5.3%	8.6%	16.8%					
	Originated	46,037	50,946	53,895	61,104	65,274	50,955	328,211					
Total	Denied	17,783	16,151	17,869	21,869	22,122	17,930	113,724					
	Denial Rate %	27.9%	24.1%	24.9%	26.4%	25.3%	26.0%	25.7%					

Table B.4											
Action of	f Owner-Occupied	d Home I	Purchas	e Loan	Applica	tions by	/ Income	<b>e</b> :			
		Originate									
State of Louisiana HMDA Data 2002 - 2007											
Income Group		2002	2003	2004	2005	2006	2007	Total			
	Loan Originated	857	874	775	572	632	333	4,043			
\$15,000 or less	Application Denied	1,470	1,337	1,199	1,211	871	675	6,763			
	Denial Rate %	63.2%	60.5%	60.7%	67.9%	58.0%	67.0%	62.6%			
	Loan Originated	8,238	8,479	8,238	7,992	6,559	4,960	44,466			
More than \$15,000 up to \$30,000	Application Denied	6,814	5,606	5,687	6,514	5,277	4,124	34,022			
up to 400,000	Denial Rate %	45.3%	39.8%	40.8%	44.9%	44.6%	45.4%	43.3%			
	Loan Originated	10,856	12,128	12,754	13,788	13,505	10,507	73,538			
More than \$30,000 up to \$45,000	Application Denied	4,698	4,157	4,463	5,511	5,535	4,411	28,775			
up to 440,000	Denial Rate %	30.2%	25.5%	25.9%	28.6%	29.1%	29.6%	28.1%			
	Loan Originated	8,694	9,867	10,634	11,836	13,196	10,046	64,273			
More than \$45,000 up to \$60,000	Application Denied	2,374	2,411	2,670	3,650	4,101	3,344	18,550			
ap to \$60,000	Denial Rate %	21.4%	19.6%	20.1%	23.6%	23.7%	25.0%	22.4%			
	Loan Originated	5,960	6,423	7,023	8,079	9,078	7,128	43,691			
More than \$60,000 up to \$75,000	Application Denied	988	1,011	1,251	1,738	2,183	1,866	9,037			
ap to \$10,000	Denial Rate %	14.2%	13.6%	15.1%	17.7%	19.4%	20.7%	17.1%			
	Loan Originated	10,334	11,931	13,266	17,033	20,270	17,188	90,022			
More than \$75,000	Application Denied	1,169	1,302	1,742	2,719	3,536	3,192	13,660			
	Denial Rate %	10.2%	9.8%	11.6%	13.8%	14.9%	15.7%	13.2%			
	Loan Originated	1,098	1,244	1,205	1,804	2,034	793	8,178			
Data Missing	Application Denied	270	327	857	526	619	318	2,917			
	Denial Rate %	19.7%	20.8%	41.6%	22.6%	23.3%	28.6%	26.3%			
Total	Loan Originated	46,037	50,946	53,895	61,104	65,274	50,955	328,211			
IUIdi	Application Denied	17,783	16,151	17,869	21,869	22,122	17,930	113,724			
	Denial Rate %	27.9%	24.1%	24.9%	26.4%	25.3%	26.0%	25.7%			

Table B.5     Action of Owner-Occupied Home Purchase Loan Applications by Income by Race:     Originated and Denied     State of Louisiana     HMDA Data 2002 - 2007											
		A. = 1/	HMDA Da \$15K -	ata 2002 - 20 <b>\$30K -</b>	07 <b>\$45K -</b>	\$60K -	<b>A---</b> <i>ii</i>	Data			
Race		<= \$15K	\$30K	\$45K	\$60K	\$75K	> \$75K	Missing	Total		
American Indian	Loan Originated	16	175	289	251	174	288	18	1,211		
or Alaskan	Application Denied	47	198	158	137	60	80	9	689		
Native	Denial Rate %	74.6%	53.1%	35.3%	35.3%	25.6%	21.7%	33.3%	36.3%		
	Loan Originated	42	601	1,136	1,207	765	1,802	319	5,872		
Asian or Pacific Islander	Application Denied	43	227	267	241	153	293	53	1,277		
101011001	Denial Rate %	50.6%	27.4%	19.0%	16.6%	16.7%	14.0%	14.2%	17.9%		
	Loan Originated	1,251	12,546	15,425	10,505	5,633	7,815	797	53,972		
Black	Application Denied	2,684	11,931	8,386	4,701	2,084	2,622	569	32,977		
	Denial Rate %	68.2%	48.7%	35.2%	30.9%	27.0%	25.1%	41.7%	37.9%		
	Loan Originated	34	391	573	371	194	323	63	1,949		
Hispanic (Race)	Application Denied	28	188	134	100	35	43	10	538		
	Denial Rate %	45.2%	32.5%	19.0%	21.2%	15.3%	11.7%	13.7%	21.6%		
	Loan Originated	2,250	27,725	50,855	47,022	33,424	72,097	5,951	239,324		
White	Application Denied	3,019	17,097	16,104	10,823	5,430	8,538	1,323	62,334		
-	Denial Rate %	57.3%	38.1%	24.1%	18.7%	14.0%	10.6%	18.2%	20.7%		
	Loan Originated	8	128	210	169	106	221	33	875		
Other	Application Denied	10	62	67	33	9	30	11	222		
	Denial Rate %	55.6%	32.6%	24.2%	16.3%	7.8%	12.0%	25.0%	20.2%		
	Loan Originated	438	2,853	4,982	4,675	3,355	7,378	781	24,462		
Not Provided by Applicant	Application Denied	925	4,270	3,622	2,503	1,262	2,046	936	15,564		
Applicant	Denial Rate %	67.9%	59.9%	42.1%	34.9%	27.3%	21.7%	54.5%	38.9%		
	Loan Originated	4	47	68	73	40	98	216	546		
Not Applicable	Application Denied	7	49	37	12	4	8	6	123		
	Denial Rate %	63.6%	51.0%	35.2%	14.1%	9.1%	7.5%	2.7%	18.4%		
	Loan Originated	4,043	44,466	73,538	64,273	43,691	90,022	8,178	328,211		
Total	Application Denied	6,763	34,022	28,775	18,550	9,037	13,660	2,917	113,724		
	Denial Rate %	62.6%	43.3%	28.1%	22.4%	17.1%	13.2%	26.3%	25.7%		
	Loan Originated	47	665	1,491	1,337	810	1,632	206	6,188		
Hispanic (Ethnia)	Application Denied	85	511	574	430	233	389	48	2,270		
(Ethnic)	Denial Rate %	64.4%	43.5%	27.8%	24.3%	22.3%	19.2%	18.9%	26.8%		

Table B.6       Percent Denial Rates by Income by Year for White Applicants       State of Louisiana       HMDA Data 2002 - 2007										
Year	2002	2003	2004	2005	2006	2007	Total			
<= \$15K	56.9%	53.6%	55.6%	61.0%	57.6%	62.4%	57.3%			
\$15K - \$30K	38.5%	35.5%	35.6%	40.2%	39.4%	40.9%	38.1%			
\$30K - \$45K	24.3%	22.4%	22.3%	24.8%	24.9%	25.7%	24.1%			
\$45K - \$60K	16.9%	16.4%	17.2%	19.6%	20.3%	20.9%	18.7%			
\$60K - \$75K	10.7%	11.4%	12.6%	14.5%	15.8%	17.3%	14.0%			
Above \$75K	7.5%	7.8%	9.5%	11.3%	11.7%	13.0%	10.6%			
Data Missing	12.5%	14.5%	26.8%	16.3%	17.0%	22.2%	18.2%			
Total	21.2%	19.6%	20.0%	21.4%	20.4%	21.4%	20.7%			

Table B.7       Percent Denial Rates by Income by Year for Black Applicants       State of Louisiana       HMDA Data 2002 - 2007											
Year	2002	2003	2004	2005	2006	2007	Total				
<= \$15K	63.8%	67.3%	65.4%	74.1%	70.5%	70.9%	68.2%				
\$15K - \$30K	49.2%	46.5%	46.4%	49.7%	50.2%	51.0%	48.7%				
\$30K - \$45K	39.1%	32.1%	32.6%	35.1%	35.3%	37.5%	35.2%				
\$45K - \$60K	32.1%	28.0%	26.6%	32.9%	29.9%	34.7%	30.9%				
\$60K - \$75K	25.4%	21.7%	22.1%	27.1%	29.5%	31.1%	27.0%				
Above \$75K	23.6%	20.0%	20.7%	24.4%	27.9%	28.3%	25.1%				
Data Missing	28.8%	22.0%	55.4%	46.4%	37.4%	49.4%	41.7%				
Total	41.6%	36.6%	36.0%	38.6%	36.7%	38.8%	37.9%				

Table B.8     Originated Owner-Occupied Home Purchase Loans by Race by HAL     Status     State of Louisiana     HMDA Data 2004 - 2007							
Race	Loan Type	2004	2005	2006	2007	Total	
American Indian	Other Originated	156	139	128	125	548	
	High APR Loan	66	87	65	57	275	
	Percent High APR	29.7%	38.5%	33.7%	31.3%	33.4%	
	Other Originated	961	819	980	862	3,622	
Asian	High APR Loan	162	230	232	163	787	
	Percent High APR	14.4%	21.9%	19.1%	15.9%	17.8%	
	Other Originated	6,159	5,086	5,629	5,507	22,381	
Black or African American	High APR Loan	3,178	5,617	5,624	3,113	17,532	
Ameridan	Percent High APR	34.0%	52.5%	50.0%	36.1%	43.9%	
White	Other Originated	32,913	34,714	35,793	30,227	133,647	
	High APR Loan	6,576	10,384	11,180	7,088	35,228	
	Percent High APR	16.7%	23.0%	23.8%	19.0%	20.9%	
	Other Originated	2,796	2,595	3,403	2,848	11,642	
Not Provided by Applicant	High APR Loan	772	1,419	2,220	941	5,352	
	Percent High APR	21.6%	35.4%	39.5%	24.8%	31.5%	
	Other Originated	140	12	17	21	190	
Not Applicable	High APR Loan	16	2	3	3	24	
	Percent High APR	10.3%	14.3%	15.0%	12.5%	11.2%	
	Other Originated	43,125	43,365	45,950	39,590	172,030	
Total	High APR Loan	10,770	17,739	19,324	11,365	59,198	
	Percent High APR	20.0%	29.0%	29.6%	22.3%	25.6%	
Hispanic	Other Originated	1,154	1,095	1,156	1,034	4,439	
	High APR Loan	261	490	698	300	1,749	
	Percent High APR	18.4%	30.9%	37.6%	22.5%	28.3%	

Table B.9       Originated Owner-Occupied Home Purchase Loans by Income by HAL Status       State of Louisiana       HMDA Data 2004 - 2007						
Income Group		2004	2005	2006	2007	Total
\$15,000 or less	Other Originated	450	285	392	173	1,300
	High APR Loan	325	287	240	160	1,012
	Percent High APR	41.9%	50.2%	38.0%	48.0%	43.8%
More than \$15,000 up to \$30,000	Other Originated	5,763	4,521	3,780	3,084	17,148
	High APR Loan	2,475	3,471	2,779	1,876	10,601
	Percent High APR	30.0%	43.4%	42.4%	37.8%	38.2%
More than \$30,000 up to \$45,000	Other Originated	9,640	8,756	8,758	7,759	34,913
	High APR Loan	3,114	5,032	4,747	2,748	15,641
	Percent High APR	24.4%	36.5%	35.1%	26.2%	30.9%
More than \$45,000 up to \$60,000	Other Originated	8,490	8,173	8,909	7,738	33,310
	High APR Loan	2,144	3,663	4,287	2,308	12,402
	Percent High APR	20.2%	30.9%	32.5%	23.0%	27.1%
More than \$60,000 up to \$75,000	Other Originated	5,931	6,115	6,562	5,724	24,332
	High APR Loan	1,092	1,964	2,516	1,404	6,976
	Percent High APR	15.5%	24.3%	27.7%	19.7%	22.3%
	Other Originated	11,800	14,107	16,156	14,539	56,602
More than \$75,000	High APR Loan	1,466	2,926	4,114	2,649	11,155
	Percent High APR	11.1%	17.2%	20.3%	15.4%	16.5%
	Other Originated	1,051	1,408	1,393	573	4,425
Data Missing	High APR Loan	154	396	641	220	1,411
	Percent High APR	12.8%	22.0%	31.5%	27.7%	24.2%
Total	Other Originated	43,125	43,365	45,950	39,590	172,030
	High APR Loan	10,770	17,739	19,324	11,365	59,198
	Percent High APR	20.0%	29.0%	29.6%	22.3%	25.6%

Table B.10     Percent of HAL Owner-Occupied Home Purchase Loans     Originated by Income     State of Louisiana     HMDA Data 2004 - 2007						
Income	2004	2005	2006	2007	Total	
<= \$15K	41.9%	50.2%	38.0%	48.0%	43.8%	
\$15K - \$30K	30.0%	43.4%	42.4%	37.8%	38.2%	
\$30K - \$45K	24.4%	36.5%	35.1%	26.2%	30.9%	
\$45K - \$60K	20.2%	30.9%	32.5%	23.0%	27.1%	
\$60K - \$75K	15.5%	24.3%	27.7%	19.7%	22.3%	
> \$75K	11.1%	17.2%	20.3%	15.4%	16.5%	
Data Missing	12.8%	22.0%	31.5%	27.7%	24.2%	
Total	20.0%	29.0%	29.6%	22.3%	25.6%	
# APPENDIX C. ADDITIONAL FAIR HOUSING SURVEY DATA

#### Table C.1

#### Survey Results: What are your concerns about fair housing in your community?

State of Louisiana

2009 Fair Housing Survey

All clients are given the opportunity to choose any home they can afford, and not steered into certain areas/neighborhoods.
 That they are sold homes that meet the standards of livability.
 a lack of accessible, affordable housing
 Access by some protected classes

access for the working poor, and young adults 18-21

access, affordability, ridiculously high "fair market rent" which jacks up the price of renting a slum on Section 8 voucher.

accessibility for the disabled and discrimination against PSH tenants

affordability and availability

Affordable housing, either renting or buying a dwelling

After Hurricane Katrina, whether fair housing guidelines are being adhered.

Age & sex

All is one area

Areas specified as "mixed income" housing provide unfair advantages to those on public assistance

availability

Barriers toward development of multi-family housing in NO East. Lack of Inclusionary provision for affordable housing.

Being in the field to provide housing to low income families yes, I see and hear about this from time to time. You have Landlords or property owners who will not rent to low income families for various reasons, one by listing the rent higher and or not wanting families with children.

Blocking of resources to develop affordable housing. "NIMBY" attitudes regarding the development of affordable and mixed income housing.

complete lack of a commitment to affirmatively further fair housing, continuing and widespread systemic violations by government bodies, a lack of resources, capacity, and support for fair housing enforcement, the fact that the state has not taken the AI seriously, to the extent that it will not be a useful document to promote fair housing and equal opportunity.

conditions of rental units

Discrimination against Section 8 tenants, anti-multi-family legislation which discriminates against low income individuals

Disc. against young AA males Disc. from apt complexes/tax credit unit developers Discr. against folks with SA/MH diagnosis Very few accessible units (complexes not meeting compliance)

discrimination

discrimination

Discrimination again persons of color, persons who are gay, the elderly, persons living with disabilities, and persons infected and affected with HIV are still being discriminated against.

Discrimination against Affordable Housing

Discrimination against individuals that are in a lower socioeconomic group.

Discrimination against minorities, against those with small children, against the poor

discrimination against persons of color and poor families generally

discrimination against those with mental health issues and/or substance abuse history

discrimination based on race

Discrimination based on race

Discrimination based on race and income and poor education

discrimination still exists

discrimination

discrimination still exists in the housing market, particularly in the citing of affordable housing developments.

Discrimination on different ethnic groups, blacks, hispanics, asians, other by more affluent whites.

Does not address need of individual, such as education to owners, managers, but more a "got you" attitude, rather than assistance due to recent news, I am concerned that people are being treated unfairly and taken advantage of and that my tax dollars are not being spent properly

Enough adequate homes available to those in need. A clear and simple process of acquiring these homes. The promotion of available housing to them that need and not to those that would take advantage of the situation.

#### Table C.1 Cont'd

#### What are your concerns about fair housing in your community?

State of Louisiana 2009 Fair Housing Survey

Equal housing for all joint races.

Ethnicity or Race Disabled and Elderly

Ethnicity or Race, Disabled and Elderly

Extensive NIMBYism

Fair market rent rates that have increased due to the influx of DHAP in our areas since Hurricane Katrina.

Hammond is not listed as an area in the survey

Hearing reports of clients who were discriminated against for race/disability & also background checks

High price for either purchasing a home or renting one

High Rental Costs; sometimes meant to exclude low income minority citizens; higher than normal real estate taxes and high insurance deductibles

homes located in the north part of lake charles are targeted as undesirable and thus is reflected in price

Housing is very limited however, one of the largest properties in this area often have vacancies but, several people have advised me that they are never called. I've been told the apts are rented to persons that the asst manage knows only.

I am concerned about race discrimination for rental properties.

I am concerned about the confidentiality of people living with HIV/AIDS in public housing.

I am sure that housing discrimination exists in New Orleans. I think a healthy supply of housing for people with disabilities is lacking in the New Orleans Area.

I believe there is still much racial discrimination, as well as other kinds.

I do not see active enforcement across the board

I have heard people say they were turned downed from renting a home because of handicap and also because they were not married they considered him not a constant source of income.

I want programs to promote more home ownership

I'm concerned that fair housing is more of a concept instead of a concrete action. Persons of lower socioeconomic statuses are still unable to access housing.

In developing Louisiana Housing Trust Fund developments in two rural Acadiana communities, we were given written evidence that were no zoning issues. However when the funds were awarded, problems arose.

Inability for poor minorities and elderly to secure affordable clean, safe housing, both rental and home ownership. Lack of understanding of community members regarding class, race, age and disabilities.

Increased rates for housing

lack of adequate housing available to handicap or disabled in community. Rental property available near family and friends.

Lack of affordable and mixed income units.

lack of affordable housing becomes a de facto discrimination issue

Lack of affordable housing.

lack of availability

Lack of Education of fair housing issues; lack of reporting of fair housing violations;

lack of high quality affordable housing

Lack of knowledge

Lack of knowledge of and enforcement of these laws

Lack of parity is quality of affordable housing for protected populations

land lords won't rent to people who need affordable housing, people are discriminated just for having a section 8 voucher, more need for rental property due to the high cost of insurance

Landlords charge too much for rent

landlords renting dilapidated and unsanitary as homes and refuses to repair or clean the rental

Laws against discrimination are not always enforced.

Limited affordable Housing

low income families & singles

Many rental units are priced out of ranges that are affordable to low-income people with disabilities.

Multiple studies have shown that discrimination based on race is common on the part of landlords. With this in mind, I can imagine that the lack of affordable rental units in the wake of Hurricane Katrina disproportionately effects minorities. Further, the way that the RH small rental program is set up, low income land lords cannot afford to take advantage of it, decreasing further the availability of rental properties in low income areas.

#### Table C.1 Cont'd

#### What are your concerns about fair housing in your community?

State of Louisiana

2009 Fair Housing Survey

my concerns are equal rights for everyone

My concerns are that the state and local municipalities are not affirmatively furthering fair housing, a requirement for recipients of CDBG grants. I am also concerned about the extreme resistance to the development of affordable housing in the New Orleans metro area; the extent and pervasiveness of housing discrimination in my community; and the failure of state and local entities to adequately address housing discrimination.

My primarily concern are applicant's that may be discriminated based upon family size in rental, and lending, and zoning in homeownership opportunities.

NIMBY Failure to follow accessibility guidelines

nimbyism effects on elderly and disabled disproportionate impact on race of families in redeveloped affordable housing sites

NIMBYism by parish officials preventing the development of affordable housing

NIMBYism in St. Bernard and Jefferson parishes; allocation of recovery funds for low income renters

NIMBYism--City Council Members do not want affordable housing in their district.

NIMBYism, an accurate forecast and resulting strategy into what kinds of housing are needed, including income ranges, and a plan for developing appropriate housing.

Not enough affordable housing stock available to those in need.

Not enough fair housing available

not enough landlords who will accept Section 8

Not enough low-moderate rental housing available.

not enough rental properties

Once landlords find out that an individual has a disability they are no longer considered by that landlord for housing.

Over pricing to control population

People are being over charged, people are having to live in uninhabitable conditions

PEOPLE OF COLOR BEING STEERED TO PURCHASE HOME IN AREAS THEY DO NOT WANT TO LIVE

People who live with HIV and/or AIDS and the Elderly seem to have a harder time finding decent affordable housing.

People who rent and don't pay.

Persons coming directly from the streets, are not the cleanest persons and are treated unfairly because of this.

Persons on Disability are denied housing.

policies that are being adhere to does not seem to make sense, ie: repair of occupied housing, that is normally for elderly or the extreme poor are not repaired because " we only have \$25,000.00 grants and the laws states that if we can not bring the entire house up to code we can't do the house." I do not believe that is accurate but even if it is, it makes no sense to leave people in a fire trap because of the poor wiring, or unsanitary housing because of poor plumbing, just because you can't do every thing the people need. We certainly could make their lives safe and far more sanitary if we used the money to do what we can.

#### Race & Age

Racial Discrimination

Racial discrimination is widespread, studies and experience have consistently shown. Familial status and disability discrimination are also common. Apartments are inaccessible. Govts oppose affordable housing with racial discrimination one important reason for this opposition. Discrimination based on sources of income is still legal.

Racial discrimination still persists in my community even in 2009 and includes both rental and home buying.

Real estate prices are too high for many people to afford to buy a house.

redhibition and steering

redlining

Rental rates seem to be based on area and is effectively keeping certain groups of people out of the area.

renter rights movement is not really present

See above. Two jurisdictions confirmed in writing that there was no zoning problem, then stifled the developments when they learned it was affordable housing.

Shortage of affordable housing Long waiting lists for housing assistance programs

Some landlords are blatant in discrimination, but is hard to prove because people are reluctant in coming forward.

That everyone be given the opportunity to live in a decent safe environment.

That everyone is treated fairly and given same opportunities no matter what. I know that is difficult during these times because many people are not trustworthy.

that landlords discriminate, especially based on race

That people with disabilities that are not widely recognized as such (like substance abuse or mental illness) are discriminated against in housing choice.

that persons who recently relocated to New Orleans for whom English is not their primary language are not offered assistance in Spanish to access fair housing laws

that the community is disengaged in the issue and most time unaware that discrimination is happening

That there is not enough investigation in the areas of homeowners insurance

The amount of Grant funds that not available for the entire Jefferson Parish Community.

the elderly

The level of public awareness is intermittent at best and fragmented by agency jurisdiction. Highly recommend the establishment of a Fair Housing Action Center in the Capital City of the State of LA whose primary responsibilities are education, investigation and enforcement year round.

the need for additional affordable units

The restrictions in place to halt the creation of enough units to sustain the City of New Orleans' considerable needs.

There is a significant amount of NIMBYism in our city. Many communities do not want any affordable housing in their community.

There is not enough housing available, period.

There is some discrimination that exists in neighborhoods

There is such a turnover in apartment managers, many apartment owner are not staffing their facilities with qualified staff. A great amount of required maintenance is not being done, and tenants are afraid to report these conditions due to fear of eviction.

too costly

Too many housing units are not handicapped accessible and I still believe there is a great deal of racial discrimination

unfair funding availabilities.

What are we doing to get more low income housing

What does it affect and how long?

Whether Landlords are following Law/renters & others know rights.

Wide perception that black people who receive welfare income will attract crime and damage the property.

Widespread racism Discrimination against people with disabilities Discrimination against gay people

#### Table C.2

#### Survey Results: What are the barriers or constraints to affirmatively furthering fair housing?

State of Louisiana 2009 Fair Housing Survey

1. A willingness not to be fair in helping clients obtain the best mortgages. 2. Outrageous closing costs.

A major barrier is created when city agencies change zoning codes so as not to allow specific housing activities.

action center focuses on Orleans parish for the most part

affordability

AFFORDABILITY

Affordability Discrimination Not enough adequate housing

again, regulatory rather than educational

an astonishing lack of commitment to the principle of affirmatively furthering fair housing on the part of elected officials and government workers, ignorance, racism, corruption, no enforcement mechanism (lack of HUD regulations regarding the duty to affirmatively further)

applications are not ways to understand

As with anything institutionalized, it is difficult to identify, let alone prevent, discrimination in the housing market because it is widespread and relatively amorphous. However, there are certainly groups taking steps to reverse it, and overt acts of discrimination are, I believe, becoming less common.

Availability

Availability of safe, affordable housing

barriers are peoples' fear of "the other"

Citizens need to be educated regarding fair treatment of everyone

City Planning. Enough and/or a variety of housing options available on the market.

City will change zoning, etc to exclude affordable housing.

Commitment and buy-in of community stakeholders, including stakeholders, politicians, etc.

Constraints exist, primarily in the form of bias, however through better education we should be able to make progress in eliminating these. I am thinking specifically of community homes that house disabled citizens. Many local residents are openly concerned about and/or opposed to community homes locating in their neighborhoods.

Contractors need more info on bidding jobs & receiving grants, example I tried to approach FEMA with NOLA 90% flood proof house design for same price as stick built, never made contacts yet some nonprofits get multimillion dollar grants & take 3 plus years to build 1st home.

Cost associated with safe decent housing.

cost of housing exceeds affordability, limiting choices

Costs of Implementation

Creating housing that is truly affordable and raising the income bracket to assist more individuals that fall into a middle income bracket that may need some assistance

Discrimination

Disinclination on the part of landlords to improve their property to meet current standards.

Do not know

Economic development and Education

Economic level, Ethnicity or Race, Disabled and Elderly

economic- rent

educating property managers about proper tenant screening techniques

Education of rights to those affected and landlords that don't know the regulations.

Elected officials who are more concerned about vacancies in market rate housing than in understanding the demand for affordable housing and making room for affordable housing in their communities.

Enforceability

Equal access to housing.

Finance: too much emphasis on homeownership denies the reality of our workforce. Also, I'm of the opinion that it would make more economic sense to tackle permanent supportive housing as a near-future priority for the city, as well as an excellent affordable transportation system.

financial literacy, lack of affordable housing

High price of rental units with no fair values given to the conditions of the properties

High rents.

Houses (as well as many apartments) are prohibitively pricey.

#### Table C.2 Cont'd

#### What are the barriers or constraints to affirmatively furthering fair housing?

State of Louisiana 2009 Fair Housing Survey

I don't see industry and/or community trainings. I don't see information on City and State websites

I think greed/money/bias deters some developers/property owners from following the law.

if a tenant has a problem they cannot resolve and must seek court relief they must wait sometimes for several months before their ordinary process hearing come to court. They endure a financial hardship in recovering deposits sand damages due them. This lack of money drives tenants to remain in substandard housing.

Inactivity from victims; lack of education or awareness

information brokers/agents may have

Insufficient resources allocated to enforcement of fair housing laws.

Intentional racial discrimination by elected officials and the public.

It seems like there is not a lot of support for building affordable housing, thus people on low income or section 8 have limited options. Affordable housing is VERY limited in our community, especially since the hurricanes.

knowledge of rights for tenants and responsibilities for landlords

Lack of accessible education of the general public about these laws and what to do if you belief you have been discriminated against

lack of affordable housing

Lack of affordable housing

Lack of affordable housing for the low income.

lack of affordable housing; entrenched practices

lack of education

Lack of housing units makes it difficult for people to find affordable housing. Landlords are getting high dollars for rental units that are being rented by construction or oil field companies. People are having to accept poor housing conditions to stay in affordable units. Some places are not worth the price landlords are charging.

Lack of knowledge even among advocates about prohibitions of discrimination due to race, disability

lack of law enforcement

Lack of understanding of Fair Housing Laws by Real Estate Brokers/Salespersons and lending institutions

Landlords who are concerned only about profit

laws are not always enforced

Limited Housing

Local fair housing agency inadequately funded, given extent of discrimination HUD not as active in enforcement locally Discrimination against sect 8 voucher holders

Loopholes need to be closed

More people are homeless and more people are affected by the down economic market

Mortgages difficult to obtain by certain races

Municipal sponsored barriers to affordable housing

Nationality

Neighborhood concerns. Too many people are afraid of low-moderate housing in their neighborhoods.

Neighborhood groups misinformed about multi-family housing and the role it plays in a community's vibrancy.

Neighborhood opposition, city council opposition to multi-unit/family housing

New amendments authored by Political folk wit a hidden agenda place in affect to bi-pass fair housing laws.

NIMBY. See above pertaining to resistance to housing developments even after being provided documentation suggesting no zoning issues.

nimbyism admission criteria issues

no laws protecting tenants from rising cost of rent and no laws protecting tenants from the condition of the property

not allowing people into housing, evicting people from housing based on disability

Not enough education and outreach

Not enough enforcement

Not enough housing available

Only certain neighborhoods are available to low income families.

People not paying

people not reporting and not knowing they have been discriminated upon and the older people who are renting a home do not know they are discriminating.

#### Table C.2 Cont'd

#### What are the barriers or constraints to affirmatively furthering fair housing?

State of Louisiana

2009 Fair Housing Survey

Perceptions and attitudes toward residents of affordable and public housing based on history of poorly managed housing and slum landlords.

Persons with criminal backgrounds

political and financial

politics, fear of minorities and blanketed racism

poverty & prejudice

Powerful lobbyists/developers Real Estate Association(Greater New Orleans) Apart. Association of Greater New Orleans

Proper processes to insure that housing is affordable

Racists homeowners

Rooted in discrimination, "Not In My Backyard" is a prevalent attitude

Same as above

See above. Funding commitments of \$1.35 in hand, but can't proceed to construction.

see answer #9

Self-Sufficiency

some parishes in the area have a strong NIMBY culture and have blocked development of affordable housing for fear of having an increase in minorities moving in their communities.

South side

State/local governmental and community opposition to the development of affordable housing; failure to fund local fair housing agencies to provide education, outreach, and enforcement of the fair housing laws; failure to enact an inclusionary zoning law; failure to comply with the fair housing act and other laws that prohibit discrimination on the basis of disabilities in terms of program and housing access; failure to affirmatively address segregated housing patterns

Stigma against substance abusers and the mentally unstable

The amount of Education and income

The commitment to fair housing is cursory in the business sectors of real estate, banking and finance. See the most recent www.ncrc.org report on the analysis of lending practices in East Baton Rouge Parish. Also, see the 2008 Update on the Analysis of Impediments for EBRP prepared by J-QUAD Planning Group. The real estate and multi-family industries only conduct an annual review of fair housing laws as a deterrent to violations. In addition, the previously active Fair Housing Commission legislatived by the Parish Council has been inactive for over 20 years and needs to be reactivated to ensure compliance with current laws on the books. Government enforcement is invisible and permits the ongoing noncompliance of private housing providers within East Baton Rouge Parish.

The cost for homeowners insurance has cost many potential homeowners 80% below to not be able to close. insurance carriers will not wright in our area, but they will wright in areas around our parish

The low income can't overcome higher pricing on homes and increased cost of insurance. The insurance premiums cause the payments to exceed and affordable payment. Lower priced homes are not in good condition and need much repair. Low income w/ more than 2 to the household can't afford homes with more than 2 bedrooms for the family size.

the people who run the program more often seem to look for reasons why they can't help people as oppose to ways that they can make these people's lives better,

The prejudice and ignorance about affordable housing.

The thought that it is not important and does not exist

There appears to be a lack of true concern for people in need of housing. Many feel that the homeless are just looking for a handout instead of a hand-up!

There is no enforcement and in most cases, the victim has no knowledge of any recourse they have when discriminated against There is not enough rental housing in the city of New Orleans and the surrounding area. The rental housing that does exist and is coming on-line is not affordable to people on social security disability or just plain social security benefits.

There is simply no enough affordable housing available in this community.

This area is a tourist attraction. therefore a prime area for upper class housing. Real estate is very expensive.

This survey is geared to larger cities and not our city.

Uninformed participants

updated current information.

Various area of misinformation in the system

Victimizers, will not fully comply with fair housing laws.

Wall Street. The mortgage process has become unfair. Credit scoring has influenced the market.

Zoning laws in some cases could provide a barrier or constraints to affirmatively furthering fair housing in particular the production of affordable housing units. Also, the refusal to make reasonable accommodations based upon the law.

Table C.3	
Survey Results: What are the geographic areas with fair housing problem	ems?
State of Louisiana	
2009 Fair Housing Survey I. The low income community	
all geographic areas	
All geographic areas	
all of Orleans parish	
Alsen St. Irma Lee Community	
ALSEN/ST.IRMA LEE COMMUNITY	
areas of substandard housing	
Baton Rouge	
3R is largely segregated in housing by race and class	
Can't say specific area.	
Certain neighborhoods are not available to low income families.	
Chalmette, St. Bernard Parish	
Citywide	
District 1 Grentna, ( Jefferson Parish) Louisiana	
East Baton Roge Parish.	
Eunice and Ville Platte.	
Eunice, St. Landry Parish, Louisiana. Ville Platte, Evangeline Parish, Louisiana.	
Fair housing is a problem in Orleans, Jefferson, St Bernard and Plaquemines.	
garden district	
Garden District and other nearly all white or affluent areas	
Garden District, Lakeview	
Harahan, Kenner, Metairie	
Houma, Thibodaux and Lafourche Parish	
don't really know but I am making an assumption that there are some problems.	
n certain suburban areas, property owners who are the purveyors of white flight, may discriminate based on c communities discriminate on the grounds that not all streets, etc. in municipality can be accessed by the reside nunicipality (they have been privatized).	
n higher income areas of the city	
t is scattered, but mostly around multi-family rental development	
lefferson and St. Bernard Parish (prefer Caucasian tenants) Uptown New Orleans	
Jefferson parish	
Jefferson Parish	
Jefferson parish St. Bernard Parish	
Jefferson Parish and St. Bernard Parish	
efferson parish as a whole but more so in Terrytown and Gretna Area	
Lafayette and surrounding areas	
Lafourche and Terrebonne Parishes	
Lots of racism in Vermilion Parish.	
ow income and rural	
_ower 3rd	
Lower ninth ward, N.O. East,	
Many communities with long-standing histories of racial or economic segregation	
Metairie, Westwego	
Metropolitan GNO Area particularly mid income areas	
Vid City	
Viddle to upper income single family neighborhoods.	
nost of the white parishes in the state	

#### Table C.3 Cont'd

#### What are the geographic areas with fair housing problems?

State of Louisiana

2009 Fair Housing Survey My office receives more housing complaint from the north side of Lafayette.

Nearby St. Bernard Parish.

New Iberia

New Orleans East Uptown Mid-City

New Orleans East, Lakeview, parts of MidCity and Uptown

New Orleans East, parts of the Westbank, uptown New Orleans, Lakeview.

New Orleans East, St. Bernard and Jefferson Parishes

New Orleans metro area, and state-wide

NO East

NO East has completely succumbed to NIMBYism

North Baton Rouge

North Lafayette

Northside

ON THE WESTBANK AND METAIRIE THEIR ARE SOME FAIR HOUSING PROBLEMS

Orleans Parish, and the surrounding metro area.

orleans parish, st bernard parish, jefferson parish

Orleans, Jefferson, St Bernard Parish

parishwide, when race and ethnicity in is an issue in neighborhoods and subdivision where whites are majority

Pick any one of the low to moderate census tracks

Pineville Housing Authority.

Primarily throughout the entire parish (NIMBY).

Proper processes to insure that housing is affordable

Property along the river front and Historical areas

Redlining appears prevalent in the insurance, credit collection and reporting, access to capital, etc. Especially in the very lowincome tracts in the Baton Rouge MSA. NIMBY issues are also widespread in the moderate to high income areas that fight against development of affordable housing projects. Areas located north of Florida Blvd are generally negatively stereotyped as undesirable places to live. Many areas with substandard housing is located are not properly served by public transit. This eliminates families from the marketplace and access to better homes.

**Rural Parishes** 

Same as #11.

Some of the newly incorporated suburban communities

South Baton Rouge, North Baton Rouge

Southside of Lafayette

St Bernard Parish areas

ST BERNARD PARISH, Uptown New Orleans (Coliseum Square Neighborhood Association in particular), New Orleans East

St. Bernard and St. Tammany Parishes

St. Bernard Parish

St. Bernard PArish

St. Bernard Parish Garden District in Orleans Parish

St. Bernard Parish, St. Tammany Parish, Orleans Parish, Jefferson Parish, the City of Kenner, etc

St. Bernard, Jefferson Parish

St. Bernard, Jefferson, Orleans, St. Tammany

Tangipahoa, Livingston, st. Helena, St. Tammany, and Washington Parishes

The entire Jefferson Parish Community where the low to moderate families are located and Section 8 including elderly

The Greater New Orleans Area.

the housing projects and east side of houma

the lower 3rd area.

The north part of the city-predom. african american residents-no funds for improvements are funneled and there is one bank-no office supply stores no pharmacies-no clothing stores-south end of city is booming with new banks-and tones of amenities The problem exists all over the city.

#### Table C.3 Cont'd What are the geographic areas with fair housing problems?

State of Louisiana

2009 Fair Housing Survey There is very little affordable rental housing in the entire city of New Orleans thibodaux University Lakes, Highland, Jefferson, and some parts of Sherwood Forest. Uptown Uptown and Downtown New Iberia,La Virtually the entire city has the problem I referred to. Webster Parish West Bank of Jefferson Parish white areas White, affluent areas, particularly in East Baton Rouge Parish. With private landlords and some apartment complexes.

Within the city limits of Baton Rouge and Central

Zachary, Livingston Parish

#### Table C.4 Survey Results: What are the main causes of problematic areas? State of Louisiana 2009 Fair Housing Survey a lack of knowledge of the home buying process and laws concerning fair housing. a proud culture of area history. I feel that if you are a buyer out of area you will pay more for the property. Affordable starter homes are in crime infested areas, so much so that better kept homes and neighborhoods are most often found outside Lafayette city limits or in very expensive neighborhoods applications are difficult to understand Barriers have not been addressed in local cities. blindness City Council members city government is profiling the north area as undesirable and not upgrading the area at all Community attitudes and perception, a lack of strong, committed leadership to promote fair housing issues, and lax enforcement of current laws on the books. correct information and assistance when needed culture, attitudes, mis information DISCRIMINATION BY PUBLIC AND PRIVATE SECTOR Do not know Economic dispar, low cost of wages for this population Endemic stigma and culture of denial. Existing residents who believe that new/revived developments would adversely affect their property values and quality of life. Fear of falling property values, traffic concerns, personal safety. Fear, lack of education and understanding. FEAR, LACK OF KNOWLEDGE Fear/ignorance of target populations; historical/institutionalized discrimination and "isms" Greed, economy and indifference Historic race discrimination Also concern by legitimate concerns by landlords about dealing with HANO/HUD aggravates discrim against voucher-holders Historical precedent; entrenched ideas Homeowners who rent do not know about the discrimination laws of fair housing. I'm personally unsure. Ignorance and prejudice Ignorance of the law ignorance, lack of social welfare, lack of enforcement

#### Table C.4 Cont'd What are the main causes of problematic areas?

State of Louisiana

2009 Fair Housing Survey

Inactivity; lack of education

Individuals in the system The Laws not conducive to the area

Individuals who live in high-end priced housing areas who think that someone of a different race or class moving into their neighborhoods will bring down property values. These are some of the same persons who are Real Estate Brokers/Salespersons and Lenders who have the ability to show and approve housing.

Lack of advocacy

lack of available housing and misappropriation of current residents

Lack of backbone of elected officials to call attention to documented cases of discrimination. Lack of attention by court system to prosecute those against whom strong cases are mounted by public interest lawyers.

Lack of community education

Lack of education and training

lack of enforcement of the fair housing laws and state/local governmental failure to comply with the affirmatively furthering fair housing requirements

Lack of functioning enforcement mechanism.

Lack of information

Lack of information about what mixed income housing means. Prejudice against lower income families.

Lack of knowledge

Lack of knowledge that the community receives

lack of knowledge, lack of interest in developing affordable housing

lack of law enforcement

Lack of public support to change

Lack of sufficient resources devoted to fair housing enforcement.

lack of training and education for landlords and owners, majority small mom and pop, attempting to get by day to day and having NO knowledge of requirements

Lack of understanding economics, and fear

lack on information/ignorance

landlords and lack of the law being enforced

Landlords charge too much for rent.... This may not be an affirmative housing issue, but it certainly puts a serious strain on the budgets of low-income families who then come to us. We can only partner with a few families each year. It is my impression that there are hundreds of families in need.

Landlords taking advantage of high demand

laws are not enforced

lax code enforcement, causing neighbors to confuse bad landlords with bad tenants; discrimination about the type of people who need affordable housing

Long history of racial bias, ignorance, bigotry, and racial prejudice

low income

money taking precedent over human rights

Most recently, the Hurricane Katrina that flooded New Orleans in Year 2005 is the biggest problem and then before the hurricane the rental housing was not always taken very good care of by landlords.

Negative attitudes to low-income individuals (classism), racism and a fear that the properties won't be managed well.

Negative impression of African Americans.

NIMBY and fear if the unknown.

NIMBYism

NIMBYism, No consequences to cities who exclude affordable housing by administrative or other means. They continue to recieve HUD funding. They continue to block affordable housing.

NIMBYism, lack of education, fear

Not enough housing available

Not enough housing to go around. There are a lot of persons who are living with relatives after the storms. They should be counted as homeless.

not enough investigation and enforcement

Parish Government

#### Table C.4 Cont'd

#### What are the main causes of problematic areas?

State of Louisiana

2009 Fair Housing Survey

People have a tendency to blame public schools for contributing to the problem

People not wanting to change there ways to include low income families and some just don't want to change due to culture status.

Perceptions and attitudes toward residents of affordable and public housing based on history of poorly managed housing and slum landlords.

Poor time management

poverty & prejudice

Prejudice minds and lack of knowledge of fair housing.

Predominately black area

prejudice and racism lack of adequate knowledge about affordable housing poor management of affordable housing in the past need for better public image and explanation of who lives in affordable housing

Price of housing is unaffordable.

Property owners only in for the money

race

Race and income disparities.

Race and Socioeconomic Prejudice

Racial prejudice

Racial and class discrimination

Racism and classism.

racism, classism

Racism, classism and a history of bad housing developments

Racism, fear, elitism

Racism, stereotyping

Rental property is being used up for industry workers and landlords can get the rent they ask for and have no need to accept people who need affordable housing

republican

See answer 11

see number 11- a total lack of commitment to the principle of affirmatively furthering fair housing, ignorance, racism, corruption

selfishness, racial discrimination, fear

Sheer ignorance and knee-jerk reaction to anything related to "affordable" housing. Also, in the past, poor opportunities for people trying to find quality affordable housing, lack of code enforcement and abysmal property management.

So called Fair Market Rental Rates are exorbitant.

Some problems are economic prejudice and some problems are racially motivated

The attitudes against multifamily units being constructed. Some who confuse affordable housing (for qualified low to moderate income residents) with Section 8.

the community remains divided along racial lines. There is no consistent and sustained advocacy toward informing those how housing discrimination is against the law

The elected officials do not want affordable housing in our parish.

The lack of leadership to put cost controls in to place.

The property in Thibodaux is limited. Not enough open areas to expand housing. Land owners can name their price. No reason to let properties go a lower prices.

The unavailability of loans to people with less than perfect credit.

This area has older smaller homes and more rental property than other sections of town. There are more apartment complexes and trailer parks. Tenants do not understand their rights and obligation and landlords are often not complying with the letter or spirit of the law

This is a traditionally African American, poor area. Appraisers devalue the property values because some residents receive government assistance for the purchasing of these properties. I personally have been told that because "those people receive government assistance, property values can be reduce by \$14000.00. This was a HUD affordable housing development and the appraised value of the homes prior to this appraiser was \$140,000.00. I'm going to file a formal complaint because I don't think that is fair. where people get the money from doesn't a thing to do with the value of their home.

Too many politics and preferences given to someone they know.

training on fair housing practices is very much needed in our community

Underserved area

Uneducated about mixed income housing or not interested Racism is also involved Fear of change

#### Table C.5

#### Survey Results: Please cite government actions that may have adversely affected fair housing State of Louisiana

2009 Fair Housing Survey

-Re-zoning -Multi-Family Housing barriers -Financing barriers

Above

Attempt to improve neighborhoods

Blocking multifamily developments, and not putting resources in the certain areas of the city.

City council members obstruct the progress of affordable housing developments (with PSH & accessible units) every chance they get.

City planning. Foot print of New Orleans.

Elimination of public housing without adequate facilities to house the displaced.

Fair Market Values Laws

Furthering isolation of the poor and minorities; lack of truly affordable, mixed-income housing

Giving out money to non profits with no construction background.

HDLC is arbitrary in their rulings; we have no enforceable master plan that includes housing, city councilpersons are fickle and somewhat arbitrary in their support of affordable housing development (Big Four approval notwithstanding.) Also, they do not understand housing funding streams and need to be educated on the differences and variety in affordable housing.

Inaction is an action

incredibly complex bureaucracy, permitting processes, etc

it is the lack of action to combat NIMBYism that has adversely affected fair housing choice

Lafayette is aware of LA Fair Housing concerns

Local government after Hurricane Katrina wanted many minority occupied areas to become green space

local single family dwelling definitions and restrictions of those who can live in areas zoned as residential single family dwellings where more than two people must be related/married to live in a single family dwelling

making it harder for minority.

moratoriums on development of multifamily Also local government should do more to speed up the approval process for affordable multifamily developments

moratoriums on siting of affordable housing and general opposition to siting of affordable housing

N/A

neglect and indifference

nothing changes in the housing market; no rent control laws

Planners have neglected upkeep of the central downtown areas, such as road repair, weed control, housing codes and vacant lots/homes

Policies and procedures which contradict fair housing laws.

Restrictive zoning ordinances throughout the New Orleans metro area that have prevented the development of affordable housing, ie Jefferson Parish, St. Bernard Parish, and the City of Kenner; the LRA's racially discriminatory calculation formula for Road Home grants; lack of funding for the development of housing in areas of opportunity, including proximity to quality education and health care; failure to adequately administer/fund educational and health systems throughout the city and state; failure to adopt inclusionary zoning ordinance; failure to train state and local governmental employees regarding the fair housing act

SBP enacted moratorium against multi-family housing. SBP enacted the "Blood Relative Ordinance".

See #11

See above regarding NIMBY notwithstanding prior confirmation of appropriate zoning.

The City of New Orleans has chosen to allow political motives to shape the deployment of critical funds needed to develop housing

The Louisiana Recovery Authority is considering revoking funding awards to affordable housing developments and redirecting funds away from housing and the reasons cited are anti-low income residents. New Orleans East, St. Bernard Parish, and Jefferson Parish are constantly trying to put moratoriums on affordable housing developments for NIMBY reasons.

The problem is not within local government, it is with developers and property management companies (like Livingston Management) that work to exclude rather than include persons who are low income and in desperate need of housing.

The way the RH program is structure, a landlord can only be reimbursed for repairing their rental property. As low income landlords infrequently qualify for private home repair loans, this program is not accessible to them.

#### Table C.5 Cont'd

#### Please cite government actions that may have adversely affected fair housing

State of Louisiana

2009 Fair Housing Survey

There is a requirement that neighborhoods have an approved plan by the Planning & Zoning Commission before they apply or receive investment from the Redevelopment Authority to improve their neighborhoods. Yet, there is very little promotion of the requirement or any technical assistance or capacity building offered the community to meet this requirement. The administration has been lax in updating the laws on the books to reflect the current groups of protected classes or to re-institute the Fair Housing Commission to serve as an oversight board to deal with fair housing issues. There has been minimal financial investment in fair housing education for the broader community, nor have there been any progressive changes in zoning, public transit, workforce development to alleviate the current barriers to fair housing.

They have often supported moratoriums on multi-family housing, thus promoting nimbyism.

They tried to convince HFA to withdraw funding from a LIHTC project in New Iberia.

under appraising of property-No capital outlaw improvement in a timely manner, sewerage, sidewalks and proper drainages, etc.

UNDERAPPRAISING OF PROPERTY-NO CAPITAL OUTLAY IMPROVEMENTS IN A TIMELY MANNER,

SEWERAGE, SIDEWALKS PROPER DRAINAGE AND , ETC.

we needed more planning in the low-income areas

widespread demolition of almost all housing projects prior to developing alternate affordable housing units - also not replacing affordable units at a rate comparable to units lost (ie mixed income 'projects' will not provide as many affordable units)

yes and no---- CD Department does a lot, but ordinances have been passed that are very close to being discriminatory regarding location of mixed income multifamily housing--- even to the point of not encouraging Federal incentives and tax credits

zoning ordinances put into effect

Zoning with excess lot sizes, permit restrictions, and implementing their own development to control were the money is spent.

# Table C.6 Survey Results: Please cite the fair housing non-compliance issues

State of Louisiana 2009 Fair Housing Survey

All individuals are guaranteed the right to fair housing.

City/Feds tore down tons of affordable housing, no progress rebuilding. Redevelopment of outer parts of NOLA post K was a short sighted and ultimately destructive idea.

Clients with disabilities are given one chance to make housing work which is a big disadvantage for people.

Dont know

Down-sizing of larger families on Housing Choice Voucher Program to smaller units when children reach 18.

endless waiting lists - inability or inefficiency to serve eligible residents in need

#### HANO

HANO cannot seem to improve the oversight of their tenant-based Section 8 program which leads to discrimination against tenants with these vouchers. This is guilt by omission (rather than by action) in my opinion.

having an adequate number of accessible units in our public housing inventory making reasonable accommodations in a timely fashion

Housing Authority of New Orleans-failure to provide reasonable accommodations and modifications for clients with disabilities; failure to replace deeply affordable ACC units during the redevelopment of public housing; failure to educate employees regarding the fair housing laws; City of Kenner Housing Authority- failure to administer programs in a way that is accessible to individual with disabilities; St. Bernard Housing Authority-failure to administer programs in a way that is accessible to individuals with disabilities

I do believe they should offer vouchers to the lowest income levels, including 0 income, in our community.

In the past, EBRPHA; however, they have recently begun improving their application process.

ineptitude & slowness of HANO before & after Katrina. Vice President Cheney's attitude & failure to send National Guard to NOLA after Katrina

Jefferson Parish, tenants do not have access to any kind of self development or self sufficiency training.

lack of transparency regarding accessibility on waiting list, both public and section 8,

Misappropriation of purchasing order and inappropriate accounting practices within HANO

N/A

New Orleans has a history of not accommodating people with disabilities

New Orleans Housing Authority has a long history of corruption

Noncompliance with reasonable accommodation requests, noncompliance with Section 504 requirements, demolition of public housing

#### Table C.6 Cont'd

#### Please cite the fair housing non-compliance issues

State of Louisiana 2009 Fair Housing Survey

One issue is lack of basic maintenance of public housing to the point of serious violation of federal standards of safety and decency. The historical record indicates that when these projects were predominantly white, HANO maintained them well. Whether this historical discrepancy is legally actionable is another question.

Only what I've read in the newspaper regarding River Gardens. Also, HANO is known to be slow, bureaucratic, unresponsive and unwilling to work in partnership to address needs.

patronage

Pineville Housing Authority, one specific community is currently being investigated for not wanting other families within the community, based on statement made on local news @ three weeks ago, they have elderly people living within and they know each other and just prefer having it like it is.

Priority into public housing is dependent on "who you know".

Rather not

Reverse discrimination

Right to return for public housing residents pre-Katrina using recovery funds

The organization seems to be absent and no one is accountable for their behavior/actions

THE PUBLIC HOUSING AUTHORITY HAS A BOARD OF THREE PEOPLE, DO BID OUT THEIR CONTRACTS, HOLD BOARD MEETING WITH ONLY TWO PEOPLE PRESENT AND THEN TAKE ACTION IN THIS TWO MEMBER BOARD MEETING LIKE EXTENDING, AND INCREASING NONE BID CONTRACTS BY 5000.00 A MONTH OR INCREASING THE DIRECTOR'S CONTRACT FROM THE YEAR 2012-2017. IF IT IS NOT A NON COMPLIANCE ISSUE IT SURE IS INAPPROPRIATE AND WRONG. SOMEONE SHOULD BE MONITORING THE FOOLISHNESS.

There are pending fair housing complaints against the Housing Authority of New Orleans, Kenner Housing Authority, and St. Bernard Housing Authorities. HANO has a long and well documented history of fair housing violations in addition to current complaints.

There is one Public Housing Facility that I know of in the City of New Orleans and it takes the Housing Authority way too long to get people placed in empty apartments.

Work requirement is a problem for people with disabilities, esp given that it takes people about 2 years to get SSI.

	Table C.7         egulations that may relate of Louisiana         Fair Housing Survey	present barriers to fair housing
see previous answers happens in most of the GNO Pa	rishes	
Allowing some landlords to charge outrageous prices for s	ub-standard housing.	
blighted housing		
Blighted Property		
Check apt. complexes for accessibility.		
City has suburban codes and regulations that do not work common green area, etc.	for infill projects that should ha	ave new urbanism rules ie; smaller lot size,
City of Ville Platte has an ordinance which says no comme ordinance can be and apparently has been selectively app		eet of residential development. This
code that address the lot size. The size restriction makes	t impossible to develop them a	affordably.
Don't know Codes		
DON'T KNOW CODES.		
Enforcement		
HUD's requirement that the Parish ensure rental and home enforced. Therefore, many households live in substandard		
I'm unsure, but I know they exist.		
I've lost track of all the ordinances St. Bernard Parish has t	ried to pass to keep out low in	come individuals.
Increased costs of HDLC's compliance for redeveloping his	storic housing stock.	
Issuance of Building Permits in Lower ninth Ward areas the	at were heavily minority occup	ied, were slower than normal
Jefferson Parish had a multifamily building condemned to a the building permit so the property could not be repaired, b		
lack of enforcement for ADA and other handicap/aging hou	ising	
Landlord's maintenance of rental properties		
2010 Analysis of Impediments	111	Final Report: 4/28/2010

# Table C.7 Cont'd Please cite the codes or regulations that may represent barriers to fair housing

State of Louisiana 2009 Fair Housing Survey

landlords not maintaining properties moratoria on multi-family housing

multi-family moratoriums that have been enacted throughout the New Orleans metro area; failure to provide reasonable accommodations to individuals with disabilities who live in group homes by limiting the number of individuals who may live in one household; selective enforcement of occupancy/health safety codes resulting in discrimination based upon national origin; restricting occupancy codes in a way that discriminates against families with children

Multiple zoning restrictions or moratoria on multi-family housing, code enforcement conducted only on blighted and uninhabited buildings in the City of New Orleans, lack of an inclusionary zoning ordinance, etc

n/a

No children in upstairs apartments

no section 8 in some sections or low income housing

NORA's unclear regulations as to which properties are affordable.

Not allowing mobile homes in the towns. These are the only affordable houses for many persons

nuisance abatement codes where personal property is condemned, often times when it could have been and should have been repaired

often the phone is not answered when seeking information individuals do not communicate intelligently with the public

pricing select groups out of what was affordable areas

Prohibition against multi-family housing in Jefferson Parish

R & D is crushed by Building Codes

Rather not

Re-Zoning to block affordable and or mixed income housing.

Safety with poor infrastructures.

SBP enacted moratorium against multi-family housing. SBP enacted the "Blood Relative Ordinance".

St. Bernard Parish's attempt to place a moratorium on multi-family units; council members refusal to support zoning variances for HIV/AIDS residential facilities; Jefferson Parish

St. Bernard Parish's ordinance du joir (whenever a court strikes down their most recent attempt to discriminate, they try a different tack)

St. Bernard Parish's restrictions to renting property and their blockage of building multi family units

The lack of enforceable regulations with regards to occupied units. The lack enforcement around abandoned and blighted properties.

THE PUBLIC HOUSING AUTHORITY ONCE AGAIN DOES NOT ALWAYS MONITOR THE SECTION 8 HOUSING CONDITION OF THE RESIDENTS, THEREFORE, RELEGATING TENANTS TO UNSAFE, UNSANITARY, AND INDECENT HOUSING CONDITIONS.

You cannot finance new construction with an FHA loan if the property is in a flood zone.

zoning

zoning laws that mandate minimum lot sizes or otherwise restrict density

#### Table C.8

#### Survey Results: Please cite policies that may represent barriers to fair housing State of Louisiana

2009 Fair Housing Survey

After Katrina, homes in minority areas were unfairly assessed for real estate taxes. Insurance deductibles have also been unfairly raised.

Barriers would include no knowledge of administrative actions or policies. Meetings take place and information sometimes is second-handed.

extra taxes for private patrols so that only in wealthy areas do people have adequate patrols

governmental entities not protecting older, diverse neighborhoods where social/cultural barriers are not issues with residents, these neighborhoods are too often the object of rezoning into light industrial and commercial zones. Governments/planning not endorsing and encouraging diverse neighborhoods with a variety of home sizes and value: these neighborhoods are more stable and sustainable than developments where the home cost range are too narrow, and size/style of homes are homogeneous.

Housing taxes are not follow through with in all districts

#### Table C.8 Cont'd

#### Please cite policies that may represent barriers to fair housing

State of Louisiana 2009 Fair Housing Survey

I would guess tax credits and how they are applied.

inadequate or non existent administrative support for the funding for construction of affordable housing

indiscriminate use of TIFS keeps support from all areas of the community, particularly residential areas

Individuals that may need housing assistance that are over the low-income tax credit guidelines have no other places to offer assistance to them

ineptitude and lack of professionalism within HANO

Insufficient funds designated to meet the needs of those who have been adversely affected.

Jefferson Parish does not allow CHDO's to submit projects anymore. WE have to wait for an RFP and it identifies the project.

Lack of knowledge

Lack of strategic, long term (3-5) housing plan, lack of coordination and leadership on housing issues, lack of funding and staffing for critical infrastructure (ORDA, NORA, Code Enforcement, etc.)

Large estates and Farmers are not taxed fairly, they pay less than residential owners of property.

LHFA financial overhead of operating their palatial office building.

Milage increased poor can't pay taxes facing possible adjudication.

MONIES GIVEN TO REBUILD 200 HOUSING UNITS AFTER THE KATRINA DISASTER WAS TAKEN BACK BECAUSE THE HOUSING WAS NEVER BUILT, LEAVING THE POOR STRUGGLING FOR AFFORABLE HOUSING. SOMEONE IN GOVERNMENT FEDERALLY OR STATE HAS DROPPED THE BALL HERE IN ALEXANDRIA BY NOT KEEPING AN EYE WHAT IS ON WHAT IS HAPPENING IN PUBLIC HOUSING.

Moratoriums and exclusionary zoning techniques

N/A

neighborhood associations forcing membership dues and imposing liens on homes

New assessment of Properties that increased taxes

no rent control law

nuisance abatement codes

parish tax office assesses the properties on the north side of I10 very low

Planning Councils refusing to sub-divide land for single family affordable housing, using planning councils to refuse re-zoning requests, moratoriums on multi-family or subdivision projects of affordable housing.

pricing

proposed legislation related to homestead exemption will unduly impact renters who frequently are minorities/women/disabled

Proposed moratoriums on multi-family. Denial of subdivisions

**Reverse Discrimination** 

SBP enacted moratorium against multi-family housing. SBP enacted the "Blood Relative Ordinance".

see above

See above.

Some taxes in current area are extremely high

Some taxes in different areas are to high

stopping of tax credit units by certain lawmakers

Tax policy-personal experience?

THE ALLOWING OF INDUSTRY TO HAVE UNFETTERED CHOICES FOR DUMP SITES AND PLANTS WHICH DEVALUE PROPERTY AND CREATE ADVERSE HEALTH PROBLEMS.

The allowing of Industry to have unfettered choices for dumpsites and plants which DEVALUE PROPERTY, CREATE ODORS, and ADVERSE HEALTH Problem.

The code that requires copies of estimates for major trades (Plumber, Electrical, HVAC) before a permit for an addition is granted

The property taxes in Orleans Parish has gone up drastically and so has Property Insurance. These two major issues have made it virtually impossible for many low-income working people from purchasing homes.

the Road Home program has not adequately addressed small rental properties and disproportionately impacted elderly and minority homeowners

The Road Home program, flood zone policies, waivers for CDBG funding related to disaster recovery, the permissive use permit process in St. Bernard Parish

#### Table C.8 Cont'd

#### Please cite policies that may represent barriers to fair housing

State of Louisiana

2009 Fair Housing Survey

The sewer user fee, waste management collection fee and escalating utility costs often places additional burdens on vulnerable households that can least afford the added costs. Especially for the elderly, disabled and low income families. Many of these families have lived with post hurricane GUSTAV damage to their living quarters, with very little recovery dollars committed to assist them bring their housing up to code. Those dollars are being diverted to infrastructure and other pet projects, but not dedicated where they are most needed. Even though the data clearly shows that continued neglect in this regard will raise the number of deteriorating housing stock in EBRP.

The State of Louisiana Tax Commission passed a recommendation that assessors use an income capitalization methodology/approach to assessing the value of properties with Low Income Housing Tax Credits to ease over priced taxes. Assessor's are not required to abide by this recommendation and several assessors in their public testimony seem to despise LIHTC properties for receiving subsidies and see their assessments as a way to get back at "the system".

#### The time it takes to process information and permits

The way this city's fails to collect adequate taxes and allows Homestead Exemption to further undercut collectible taxes represents, in my opinion, a clear and present danger to the housing market. The artificial devaluing of most of the city encourages redevelopment, specifically the creation of affordable housing, but the prejudice of the populace stymies these projects which creates a situation where huge swaths of lands sit idle.

#### unsure

What tax incentives are offered?

while government states that they want to create mixed income housing, the funding is restricted to 80% and below. If a nonprofit developer can only sell to 80% and below that creates a community of only 80% and below buyers and not a mixed income community

# Table C.9 Survey Results: How should fair housing laws be changed?

State of Louisiana 2009 Fair Housing Survey

1. The laws on the books need to be updated in keeping with the federal laws. 2. The Fair Housing Commission needs to be reinstituted to carry out the functions for which it was charged over 20 years ago. There should be zero impediments to making this a reality.

Additional information when individuals receive rental or homebuyer counseling

adopt additional protected classes such as source of income and adopt a fair housing ordinance that is actually enforceable. fund fair housing education, outreach and enforcement in meaningful ways.

amended to protect tenants from high demand and protect tenants from uninhabitable properties

changes needs to be made to include instead of excluding minority

Compliance must be enforced with monitoring and accountability

Develop an equitable process by planning councils and city councils to issue sub-division and/or zoning. For infill projects, utilize new urbanism codes.

Fair housing laws need to be given to all providers to study. Afterwards, discussions should follow to keep providers up to date on old/new ideas.

Grants should be given to for profit companies building not just unqualified non profits. Example: Cypress Group gets \$72 Million to build 500 Katrina Cottages, Our Company could build 500 Katrina Cottages for \$100 sq ft starting in 30 days not 21/2 years, saving millions or building many more homes.

If sexual orientation isn't included, it should be.

Implementation of aggressive local codes that penalized those who discriminate. Provide more information to potential victims and perpetrators about housing discrimination.

Included in the act should be protection for by-racial renting.

Inclusionary ordinances need to be adopted that mandate that a portion of new housing must conform with affordable housing goals including mitigation fees that support affordable housing development

law should prohibit discrimination on the basis of source of income

Make income source discrimination illegal.

More equitable

More teeth must be placed into law.

need to be enforced

need to protect voucher holders and recipients of other subsidies in addition to current protected classes

Probably not changed, but fairly enforced.

#### Table C.9 Cont'd How should fair housing laws be changed?

State of Louisiana

2009 Fair Housing Survey

Proper tax assessing needs to be adhere to in all communities rent control

should do more to promote rights of protected classes, eg persons living w/ HIV/AIDS

stricter housing laws for landlords

taxes

there is still some racial profiling and this needs to stop-education is seriously needed

There needs to be investigation into employees and residents of public housing.

They need to be enforced.

to include persons with criminal backgrounds

To meet the needs of our community

To meet the needs of our community.

To prevent discrimination based on source of income.

To the need of the community

Violate rights of private ownership

#### Table C.10

#### Survey Results: If you have other comments, please feel free to share them

State of Louisiana 2009 Fair Housing Survey

A comparison of the East Baton Rouge Parish Impediments to Fair Housing 2008 Report should be compared to the current analysis underway at the State level to determine if there are any disparities or consistencies in 2009 with content.

as briefly stated above, Fair Housing Laws were created to benefit the public as a whole in a "fair and equal" manner, somehow it has changed to an "Enforcement" group rather than an "Assistance" policy and direction, In New Orleans, by now, most property owners know of "FH", but not necessarily the actual requirements other than racial discrimination. In my opinion, a little information will go a long way to avoid any problems, yes, there will always be a few and those, who have preferences that violate and those should be cited and removed as landlords. More problems exist that owners do not maintain or provide what I call "decent and sanitary" shelter, whether by neglect or tenant abuse, either way it reduce overall quality of life for all in the community. All housing standards whether new construction, planning, inspections, code enforcement and maintenance requirements should be under one department or agency of the municipality, not spread to many other jurisdictional group, or at least report to one. Too many cooks in the kitchen.

Good survey to make people aware of Fair Housing Laws.

I am sorry that my answers are many with "don't Know"-- Unfortunately that's the street- it is something I am not sure of and needed to be exposed. I wanted to take the survey, incase I was knowledgeable in it, Good Luck to you- but I will forward this to others I know.

I haven't seen any testing in the Shreveport area recently, but I have seen TV spots in the past.

I would love a face to face meeting with decision makers

if we don't know the law, we can't know what needs to be changed.

Lack of knowledge

More testing will help insure better compliance to fair housing laws. Required education for all persons who are extended assistance with housing would help everyone work to the entire communities advantage.

More than fair housing compliance, there is a need for adequate housing. Too little affordable housing is available for low and very low income folks.

Now is the time for less interference from HUD, not more

One barrier to fair housing is not allowing low income individuals the use of funding programs (grants / soft seconds) for targeted areas based on where they currently reside. Example: City (A) Grants are provided to current residents of City (A). Residents of the surrounding communities may not be afforded the opportunity to move to City (A) due to their current residence being outside of the City (A) limits. (This may appear as an obstacle and discouragement to a first time homebuyer seeking the paths towards home ownership.

Our local Fair Housing Office in New Orleans does an excellent job in educating the community through its outreach programs. Reaching out to local communities, including smaller municipalities, would be helpful.

#### Table C.10 Cont'd How should fair housing laws be changed?

State of Louisiana 2009 Fair Housing Survey

Several of the questions in this survey are flawed. When you ask if the respondent is "aware" of certain problems in the community, you are not allowing the option that the respondent might believe that there are not problems in the community. As long as you've got a "Don't Know" option, you are safe to ask whether there are certain problems, and if the respondent is unaware of the existence of problems, he/she can say "Don't Know".

Terrebonne Parish has no real plan to address fair housing and has not implemented any measures that I know of that affirmatively furthers fair housing in this community

Thank you for this survey. I hope it helps. I've heard widespread reports of discrimination. Something must be done!

Thank you for your work.

Thanks for making this a consideration...also, don't forget the needs of those who are chronically disabled (for a variety of reasons) this is a housing and public health issue for all of us. PSS and fair housing needs to be included in every community (emphasis), not just low-income communities. It's every neighborhood's responsibility, and it's about the management, not the resident!

Thanks for taking the time to administer this survey.

The administrative housing policies perpetual housing discrimination and makes it impossible for organization committed to develop affordable house to survive.

The applicable fair housing laws do not need to be changed; they need to be enforced. Education and community outreach need to be enhanced.

The fair housing laws perhaps do not need to be changed, but I think they may not be enforced effectively. For instance, why aren't folks in subsidized housing forced to maintain their property? Also, if folks are getting subsidized housing they should be evicted for causing damage or for being non-compliant in other areas such as noise, too many people in the house and drug usage or other illegal activities

The GNO Fair Housing Action Center does a wonderful job of educating the community and providing outreach efforts to inform and protect the community with fair housing laws and practices.

The Jefferson Parish Finance Authority has not received any complaints from our citizens alleging any kind of discrimination when buying a home

There seems to be a lack of housing in Jefferson Parish for individuals with mobility problems.

There should be a mechanism for renters to learn and understand their rights as tenants. it should also be reader friendly.

We in the Apartment Association strongly suggest to everyone in our Association and those not in it to be sure to educate their employees and team about Fair Housing. This is offered twice a year in our Association; therefore no one should not know everything there is to know.

We must continue to make sure that all are treated equally.

We need to foster and promote available housing. With available housing the problems of discrimination would not be so hidden.

We would make great strides if current laws were implemented

When and where will provider meetings take place for smaller cities?

# THE 2009 LOUISIANA FAIR HOUSING FORUMS

Sponsored by the Louisiana Office of Community Development

## You are invited to attend!

The state of Louisiana is currently undertaking a study to evaluate fair housing throughout the state. It is known as: The Analysis of Impediments to Fair Housing Choice.

Listen to preliminary findings of the study. Provide your knowledge, opinions and feelings about fair housing choice. Offer your suggestions on how to eliminate impediments to fair housing choice and ways we can work together to further fair housing in your community.

Federal and state fair housing laws prohibit discrimination in housing based on race, color, religion, sex, national origin, disability or familial status.

Orleans Parish has extended additional protections for sexual orientation, gender identification, creed, age and marital status.

### Ten Fair Housing Forums are scheduled November 16 through November 19, 2009

#### Monday, Nov 16

City of New Orleans 10:00 am, Monday St. Maria Goretti Church L. Earl Gautreaux JCL Center, Rooms 3 & 4 7300 Crowder Blvd. Mr. Barry Walton 504-658-4348

Jefferson Parish and City of Kenner 1:00 pm, Monday East Bank Council Chambers 1221 Elmwood Park Blvd. 2<sup>nd</sup> Floor Ms. Anatola Thompson 504-736-6260

For anyone in need of special accommodations, please provide advance notice by contacting the above contact persons City of Slidell 4:00 pm, Monday Slidell City Council Chambers 1330 Bayou Lane Trailer #110 Ms. Marina Stevens 985-646-3879

#### Tuesday, Nov 17

East Baton Rouge and State of Louisiana 9:00 am, Tuesday Louisiana Housing Finance Agency 2415 Quail Drive LHFA Board Room Ms. Annie Clark 225-810-5689



Houma/Terrebonne and City of Thibodaux 2:00 pm, Tuesday 8026 Main St, 2<sup>nd</sup> Floor Council Meeting Room Houma, LA 70360 Ms. Kelli Cunningham 985-873-6591

#### Wednesday, Nov 18

City of Lake Charles 9:00 am, Wednesday Council Chambers 326 Pujo Street 1<sup>st</sup> Floor Ms. Esther Vincent 337-491-1485

#### Lafayette 5:00 pm, Wednesday Greenhouse Senior Center 110 NE Evangeline Thruway Mr. Jeff Broussard 337-291-8422

#### Thursday, Nov 19

City of Monroe 10:00 am, Thursday Monroe City Hall 400 Lea Joyner Expressway Ms. Alecia Murphy 318-329-2256

Bossier City 1:00 pm Thursday Bossier Parish Library Historical Center 2206 Beckett St. Mr. Bob Brown 318-741-8560

City of Alexandria 5:00 pm Thursday Bolton Avenue Community Center 315 Bolton Ave. Ms. Brenda Ray 318-449-5072

# **APPENDIX E. GLOSSARY**

Americans with D	Disabilities Act
	Established in 1990 and offers protection from discrimination for persons with disabilities.
Consolidated Plan	
	The Consolidated Plan services four separate, but integrated functions as: a
	planning document for the jurisdiction which builds on a participatory process with residents; an application for federal funds under HUD's formula grant programs which are: CDBG, HOME, ESG, HOPWA; a three- to five-year strategy
	to be followed in carrying out HUD programs; and lastly, an action plan describing individuals activities to be implemented.
Cost Burden	
	Relates to persons who spend more than 30.0 percent of their income on housing and housing related costs.
Denial Rate	
	The rate at which loans are rejected; in this report refers to mortgage lending activity.
Disproportionate .	Share
	A geographic region is said to have a disproportionate share of a population when that population comprises more than 10 percentage points of jurisdiction average.
Entitlement Area	,
	An underlying formula governing the allocation of Block Grant funds to eligible recipients. Entitlement grants are provided to larger urban cities (i.e. population greater than 50,000) and larger urban counties (greater than 200,000).
Fair Housing Act	
	Refers to Title VIII of the 1968 Civil Rights Act, which made it illegal to discriminate in the buying, selling or renting of housing based on a person's race, color, religion or national origin.
Fair Housing Assis	-
	An agency or organization that operates on a substantially equivalent level as a federal agency and is contracted to process housing complaints.
Fair Housing Initia	
	An agency or organization that receives federal grant money in exchange for offering fair housing services, such as education and outreach or testing.
Financial Literacy	
Lligh Appual Dava	In this report, refers to understanding of the mortgage lending industry and its practices, including high interest rate loans and credit history.
r iigii Annuar reic	entage Rate Loans Loans that are more than three percentage points for home purchases when contrasted with comparable treasure instruments or five percentage points for refinance loans.

Home Mortgage I	Disclosure Act	
	Enacted in 1975 and established that financial agencies are required to publicly disclose the race, sex, and income of mortgage applicants and	
	borrowers by census tract.	
Housing Amendn		
-	Extended protections of the Fair Housing Act to include familial status and disability.	
NIMBY	,	
	An acronym for Not In My Backyard; example: resistance to development of projects such as low-income housing or airports in local areas.	
Non-entitlement Area		
	Geographic areas that are not considered Entitlement Areas in the distribution of Block Grant funds.	
Tenure		
	Refers to status of housing in terms of being occupied or unoccupied, can be further classified by being occupied by renters or owners.	
Predatory Lending		
, , ,	In this report, refers to origination of high annual percentage rate loans, or loans that are more than three percentage points for home purchases when contrasted with comparable treasure instruments or five percentage points for refinance loans.	
Protected Class		
	Groups of persons protected by law in fair housing transactions.	
Reasonable Acco	mmodation	
	A modification or change in terms or property to accommodate a person with disabilities; example: installing a ramp for a person in a wheelchair or allowing a service animal to reside in an apartment complex that otherwise does not accept animals.	