# City of New Albany

Analysis of Impediments to Fair Housing Choice – Draft

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#### I: Introduction

The City of New Albany receives funding from HUD for the development and continuation of affordable housing. Annually, the City of New Albany receives approximately 600,000 dollars to help with this effort. The Consolidated Plan is a five-year plan that sets goals and strategies for funding affordable housing and community development efforts. From 2015 until 2019, the City of New Albany expects to receive 2.9 million dollars to invest in the community from HUD.

As part of this funding, the federal government mandates a review of impediments to fair housing choice in the private and public sectors. This is the *Analysis of Impediments to Fair Housing Choice* (AI) for the City of New Albany. It is a new document, examining the housing choices for residents living in the City of New Albany. The last AI was published in 2010. This document serves to both fulfill the requirements set by the U.S. Department of Housing and Urban Development (HUD) and steer the City of New Albany as it develops multiple plans for future development.

Federal regulations do not require a formal approval of this document by HUD to be compliant; however, the document must include:

- A review of the City of New Albany' laws, regulations, administrative policies and planning;
- An analysis of how those laws affect the placement and development of housing;
- An assessment of public and private sector circumstances affecting housing choice.

According to HUD, impediments to fair housing choice are:

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

Race, color, religion, sex, disability, familial status and national origin are defined by HUD as protected classes. The City of New Albany, utilizing funding from the Community Development Block Grant, has hired City Consultants and Research, LLC to prepare this report on their behalf.

The City of New Albany Indiana published its previous Analysis of Impediments (AI) in July 2010. The document found several impediments:



- The lack of affordable housing in some areas of the City;
- The lack of reliable and convenient public transportation throughout the City which restricts living options;
- The potential for resistance to development of Affordable Housing in some neighborhoods as evidenced in the Linden Meadows situation;
- Lack of a fair housing testing program to determine whether discrimination is occurring which can't be determined through data analysis; and,
- General lack of understanding about Fair Housing and its issues.

## History of the Fair Housing Act

The Fair Housing Act, passed by the U.S. Congress in 1968, is an extension of the Civil Rights movement to protect certain classes of people from discrimination when trying to locate housing. The U.S. Department of Housing and Urban Development, through its Office of Fair Housing and Equal Opportunity, enforces the Act to prevent discrimination and intimidation of people in their homes, apartments and condominium complexes and in nearly all housing transactions related to the rental or sale of housing and provision of mortgage financing. The Act only exempts owner-occupied buildings with no more than four units, single family housing sold or rented without the use of a real estate agent or broker and housing operated by organizations and private clubs that limit occupancy to members (US Department of Housing and Urban Development). The protected classes in the Act include race, color, religion sex, disability, familial status and national origin. Income level is not a protected class in the Act, however, many of the protected classes do have a higher ratio of people with lower incomes, so this document will examine the location of households based on income, as well as the protected classes.

The act prevents the following activities based on race, color, religion, sex, disability, familial status or national origin:

- Refusal to rent or sell a property;
- Refusal to negotiate on housing;
- Refusal to make housing available;
- Denial of housing;
- Setting different terms, provisions or conditions for the sale or rental of the housing;
- Providing different housing services or facilities;
- Persuading a person to sell their home or rent their home by suggesting a certain race has moved into the community;



- Denial of a person access to membership or participation in an organization, facility or service on the basis or related to the sale or rental of housing;
- Refusal to provide a mortgage;
- Refusal to provide information on mortgages;
- Imposing different terms for mortgages;
- Appraising property differently;
- Refusal to purchase a loan or mortgage;
- Intimidation or interference with anyone exercising fair housing or assisting others with fair housing;
- Refusal to provide homeowners insurance;
- Providing different insurance rates or terms related to insurance;
- Refusal to provide all terms of homeowners insurance or all information regarding available insurance;
- Making or printing any information regarding the sale or rental of housing, including mortgage and insurance information that indicates a preference or limitation to one of the protected classes.



## State of Indiana Fair Housing Acts

The primary enforcement agency for the State of Indiana is the Indiana Civil Rights Commission. The agency was established in 1961 as the Indiana Fair Employment Practices Commission. The agency lacked ability to enforce decisions or laws and had a limited scope. In 1963, the scope expanded to include civil rights and renamed the Indiana Civil Rights Commission (ICRC). The agency's ability to enforce laws, prosecute and make administrative decisions expanded at that time. The ICRC further expanded its jurisdiction in 1965 to include Housing.

In 1991, the State of Indiana General Assembly passed the Indiana Fair Housing Act Enacting the Indiana Fair Housing Act and promulgating rules and regulations were part of a process that allowed the agency to be certified as a substantially equivalent fair housing enforcement agency with the U.S. Department of Housing and Urban Development (HUD). The Indiana Fair Housing law prohibits activities like blockbusting and discriminatory advertising, which have the effect of making it harder for a person to live in a neighborhood or individual housing unit of their choice.

The ICRC recently issued its 2015-2018 Strategic Plan. The primary focus of the ICRC plan is:

- 1. To effectively educate Hoosiers on civil rights issues;
- 2. To provide efficient services to Indiana residents; and
- 3. To better understand civil rights issues Statewide.

The three strategic objectives each have a number of performance measures detailing outcomes to be achieved during the four-year period the plan is in effect. The different outcomes are designed to measure the Commission's progress in carrying out its mission in a time of static resources and an increasing need for services.

## City of New Albany Fair Housing Ordinance

The City of New Albany, Ordinance No. G-14-15 states the City of New Albany shall set policies "to provide, within constitutional limitation, for fair housing throughout its corporate limits as provide for under the federal Civil Rights Act of 1969, as amended, the federal Housing and Community Development Act of 1974, as amended and the Indiana Code 22-9.5-1 et. seq."

Section 4 goes further to define the types of housing discrimination, including preventing the selling or renting of a property based any of the above protected classes, preventing reasonable accommodations and the prohibition of discriminatory advertising.

Although the local ordinance lists the protected classes as the federal Fair Housing Act and the State of Indiana Fair Housing Act, it is not substantially equivalent to that of the federal housing act.



The City of New Albany does not have a person or department tasked with receiving calls about fair housing. The previous person assigned those duties had resigned from duties in July 2014. This document will discuss the need for the Redevelopment Department to fulfill this need and advocate for affordable housing development in Section VII: The Action Plan.

## Research Methodology

City Consultants and Research, LLC (CCR) drafted the *Analysis of Impediments to Fair Housing Choice* on behalf of the city of New Albany. CCR utilized the guidance in the *Fair Housing Planning Guide*, *Volume 1* to prepare this document. Our scope of work included:

- 1. Project Initiation: This included a meeting with Mayor Jeff Gahan and City of New Albany Redevelopment staff to begin the project. Meeting topics included communicating important stakeholders' contact information for consultation interviews, the review of previous actions taken and collection of other relevant data.
- 2. Community Data Review: CCR conducted a community profile review using 2010 U.S. Census information, the 2013 American Community Survey, data from the U.S. Bureau of Labor Statistics and the Indiana Business Research Center. Information was broken down into demographic information, income information and household type.
- 3. Housing Profile: CCR conducted a review of the housing market of the City of New Albany. Information and data were collected from the 2010 U.S. Census, the 2013 American Community Survey, data from the National Low Income Housing Coalition and U.S. Department of Housing and Urban Development CHAS data sets, 2007-2011. CCR also examined reports analyzing Home Mortgage Disclosure Act (HMDA) data and foreclosure information to determine if any racial disparities occurred.
- 4. Compliance Profile: CCR examined legal documents such as zoning regulations, zoning variance procedures, fair housing education programs and reporting to determine if any legal structures exist that prohibit fair housing choice.
- 5. Survey and Community Input: The Redevelopment Department initiated an on-line survey. The survey covers topics of fair housing, community development, social services and barriers to affordable housing. CCR conducted a presentation to a group of stakeholders at the Southern Indiana Housing Initiative monthly meeting. CCR also conducted face-to-face interviews of stakeholders to determine the housing issues with greatest need as it pertains to fair housing choice. The survey is included in Appendix A.
- Self-Evaluation and Identification of Impediments: CCR reviewed all sections of the analysis to identify any impediments to fair housing choice. CCR also evaluated the progress made by the City of New Albany to address impediments identified in the previous Al reports.



7. Action Plan: CCR worked with the City of New Albany to develop a strategic plan for addressing fair housing choice. CCR worked to develop goals that would be realistic and achievable, based on the progress made from previous Al documents.

## **Report Organization**

The remainder of this document is organized into six sections and three appendices.

II: Community Profile

III: Housing Profile

IV: Land Use Profile

V: Compliance Data

VI: Mail Survey and Community Input

VII: Fair Housing Impediments, Recommendations and Action Plan

Appendix A: Survey Instruments and Public Presentations

Appendix B: Stakeholder Interviewees

Appendix C: Results of Southern Indiana Housing Initiative Meeting

#### *Acknowledgements*

City Consultants and Research, LLC would like to thank the many people who helped complete this document. The Staff with the Redevelopment Department of the City of New Albany and the staff with the New Albany Public Housing Authority provided vital information for the completion of this document. Both provided insight into affordable housing development and connections to stakeholders in the community.

Maps in this document have been created utilizing the U.S. Department of Housing and Urban Development CPD mapping system and ArcGIS Standard, with data from HUD, the US Census and the local housing authority.



## **II: Community Profile**

This section of the AI analyzes the demographic makeup of the City of New Albany, Floyd County and illustrates the socioeconomic geography to create a background for analysis of the housing and lending profiles that follow in this report.

The City of New Albany is located in Southern Indiana, across the river from the City of Louisville, Kentucky. The City of New Albany is part of the Louisville Metropolitan Statistical Area. The City is also the county seat for Floyd County. Outside the City of New Albany, the remaining parts of Floyd County are primarily rural. Figure 1 is a map of the City of New Albany and the surrounding area.



Figure 1 - Map of New Albany Indiana



## Population, Demographics and Geography

According to the 2013 American Community Survey estimates, New Albany was home to 36,513 individuals. That is an increase of 141 individuals from the decennial census in April 2010 listed the population at 36,372 individuals. That is a nominal increase of 0.4 percent over three years. The 2000 Census listed the population at 37,603. The population peak for New Albany was in 1970 with 38,402 people. The 2013 American Community Survey data places the number of households in New Albany at 15,575.

These population estimates are five-year estimates from the *American Community Survey* from 2009 to 2013, which is a small sampling of the population. Depending on the level of detail or topic, some estimates are not available in the ACS numbers. When analyzing data in this study, the most recent data will be used unless it is not available at the geographic level required.

The City of New Albany is divided into "tracts" for the purpose of Census reporting. The *Analysis of Impediments to Fair Housing* report created for the City of New Albany in December 2014/January 2015 and provides for a complete demographic analysis of the 2010 Census report, including information on race, ethnicity, gender, income, etc. by township. Basic total population information and what is available from interim reporting sources, such as the ACS and the Indiana Business Research Center, the City of New Albany can determine how to promote fair housing initiatives. However, the best estimated information available in 2013 does not allow for this detailed of a demographic analysis at the township/tract level.

Census Tracts are small, relatively permanent statistical subdivisions of a county or equivalent entity that are updated by local participants prior to each decennial census as part of the Census Bureau's Participant Statistical Areas Program. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data, some times where no local government, state or tribal location participates. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people.

Figure 2 shows the percent population change 1900 to 2013. These growth/decline numbers are based on estimates from the Decennial Census and the 2013 American Community Survey.

Despite the decline in population since 1970, the City of New Albany population has remained steady, with a total population hovering around 36,000 people. Population by Census Tract is available for the 2010 Decennial Census. However, since the census tract numbers have changed since 2000, this document cannot make a comparison between the different decennial census numbers and can only evaluate the 2010 data.



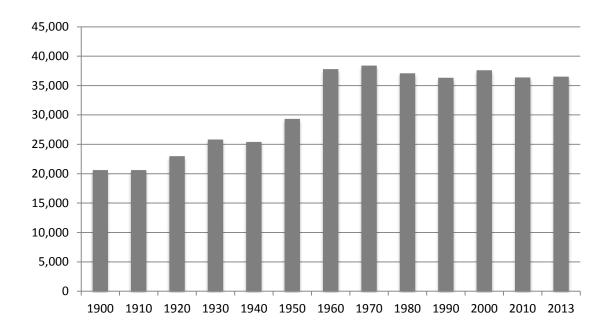
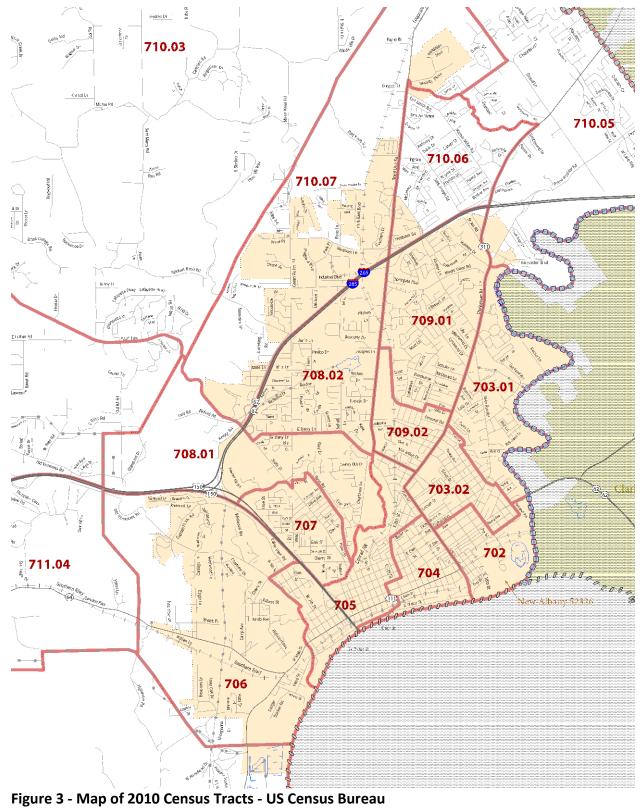


Figure 2 - Population Growth

Figure 3 on the next page shows a map of the census tracts. Some tracts are not fully located within the geographic boundaries of New Albany. For the purpose of the analysis, if the tract is located partially (50 percent or more) or totally within New Albany, it is included as part of the analysis.







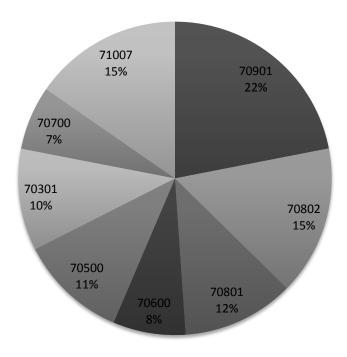


Figure 4 - Percentage of New Albany Population by Census Tract

The largest parts of the population live outside of the downtown area and towards the Interstate 265 loop, northeast of the urban center of the City. The largest census tract in the area is 709.01, with just under one quarter of the total City population. Census tract 710.07 is a new census tract for the 2010 Census, thus population numbers are not available prior to 2010.

**Table 1 - Population by Census Tract** 

Census Tract	70901	70802	70801	70600	70500	70301	70700	71007
2012 American Community Survey	6,359	4,464	3,354	2,179	3,224	3,045	1,911	4,454
2010 Census	5,612	4,314	3,530	2,297	3,150	2,908	2,357	<b>4,44</b> 0
2000 Census	5,595	4,576	3,517	2,570	3,091	2,914	2,574	N/A



Expanding beyond the City of New Albany, the townships across Floyd County have increased in population since 2000. Table 2 shows the population growth from 2000 until 2013. Lafayette Township and Georgetown Townships saw the biggest increases in population since 2000.

Table 2 - Population Growth by Township

	Franklin	Georgetown	Greenville	Lafayette	New Albany
2013 Population	1,320	9,786	7,003	7,508	49,503
2000 Population	1,292	8,337	6,340	6,378	48,476
Population Increase	2.17%	17.38%	10.46%	17.72%	2.12%

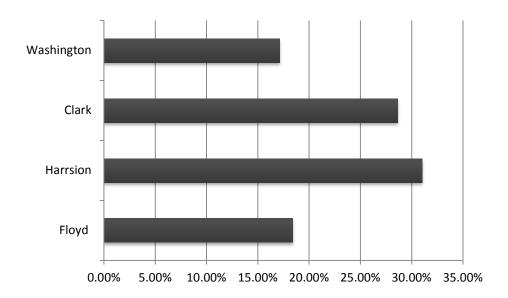


Figure 5 - Population Growth by County - Indiana Counties in Louisville MSA

The Floyd County population increased by over 18 percent, according to Stats Indiana, from 2000 to 2013. An important part of the total consideration of growth in Floyd County is the rate of growth of the surrounding counties. As Figure 4 shows, the population is growing in all of the Indiana Counties considered to be a part of the Louisville Metropolitan Statistical Area (MSA). By far the largest population increase has been seen in Harrison County, directly west of Floyd County and New Albany. See Figure 6 for a map of the entire metropolitan area. Harrison

<sup>&</sup>lt;sup>1</sup> STATS Indiana is the official digital data center for the State of Indiana. STATS Indiana is part of the Information for Indiana initiative to improve availability and access to data by working with state agencies to bring more and better data to Hoosiers. http://www.stats.indiana.edu.



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County has grown by over 31 percent from 1990 – 2013. Clark County also experienced a high rate of growth with a 28 percent population increase.

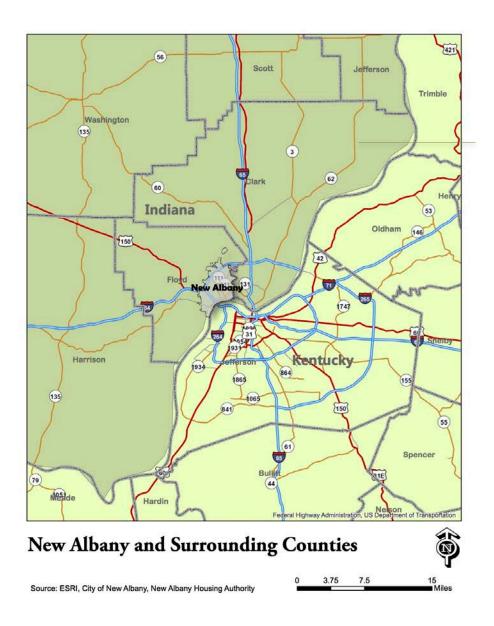


Figure 6 - Map of the City of New Albany and Surrounding Counties, Indiana

Race and Ethnicity



A key factor to analyzing the existing impediments to fair housing within a given area is the examination of distribution of racial and ethnic minorities across the region. In some cases, minority concentrations are a reflection of preferences, meaning that minorities may choose to live in certain areas because of access to the types of grocery stores, restaurants, etc. that cater to them. However, in other cases, minority populations are intentionally discouraged from living in certain areas. Housing prices can also affect the decision of some minorities when choosing where to live. Housing affordability and the dispersion of affordable units is discussed in the Housing Profile section of this document. This document will only examine data and not make assumptions as to why households of different races live in areas of the community.

From the 2010 Decennial Census, the basic racial makeup of the City of New Albany is 85.8 percent White, 8.7 percent African American and 2.6 percent other racial minorities, which is comprised of the typical racial/ethnic categories found in the census. These categories include: (1) American Indian and Alaska Native, (2) Asian, (3) Native Hawaiian and Other Pacific Islander, and (4) Other. Slightly over 1.7 percent of the total population in New Albany listed themselves as "some other race." 2.9 percent of the total population in New Albany listed themselves as two or more races.

It is important to note that race information did not provide information about the percentage of the total population that classify themselves as Hispanic or Latino. Individuals from this ethnic background were not likely to identify as any of the available racial categories tracked in the Census. They may select "Other" and they may not. To ascertain the percentage of the population that is Hispanic or Latino, a separate 2010 Census question was created. 3.7 percent of the New Albany population identified themselves as Hispanic or Latino. This is a 184 percent increase of the Hispanic population for New Albany since the 2000 Census, which showed 1.3 percent of the population identifying themselves as Hispanic or Latino.

Figure 6 shows the percentage of the population in each census tract that identifies themselves as White, according to the 2013 American Community Survey.



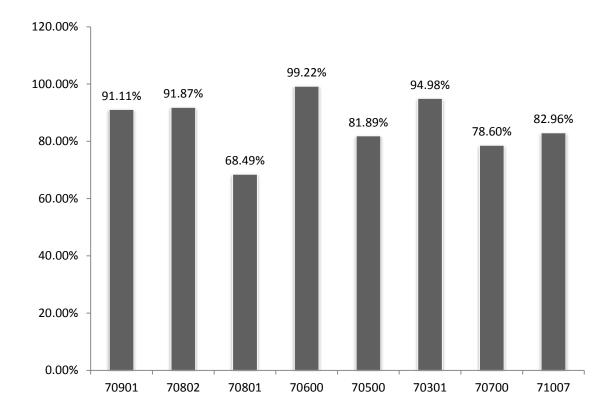


Figure 7 - Percent of Township Identifying Themselves as White

The chart reflects that White residents are the majority of the population in all of the census tracts located partially or wholly in the City of New Albany. The census tracts with the largest concentration of Whites are towards the outskirts of the City, away from downtown New Albany. Over 80 percent of the population is White in these census tracts. Figure 7 shows the percent of the population in each township identifying them as African American.



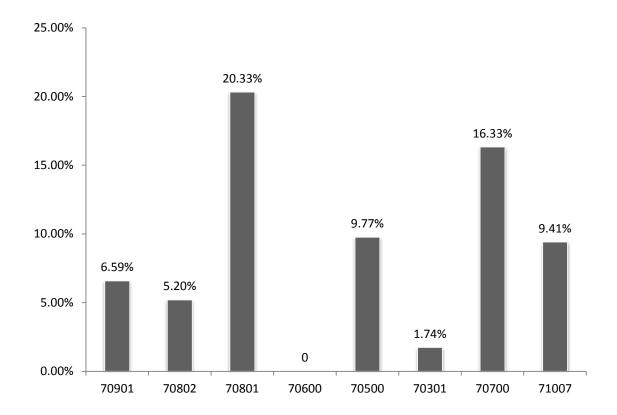


Figure 8 - Percent of Census Tract Identifying Themselves as Black or African American

Census tract 708.01 has the largest percent of its population identifying themselves as African American. Approximately one fifth of the population identify themselves as African American. According to the 2013 American Community Survey, one census tract has no people identifying themselves as African American and another census tract with under two percent of the population identifying themselves as African American.

Other Racial Minorities are calculated together using the individual 2013 American Community Survey data from the following racial categories: (1) American Indian and Alaska Native, (2) Asian, (3) Native Hawaiian and Other Pacific Islander, and (4) Some Other Race. Three Census Tracts have higher percentages of minorities, with more than 7.5 percent of the population identifying themselves as another minority. They are the same three areas with the higher percentages of people identifying themselves as Black or African American. Figure 9 shows the percentage of each census tract's population identifying themselves as one of the other racial minorities.



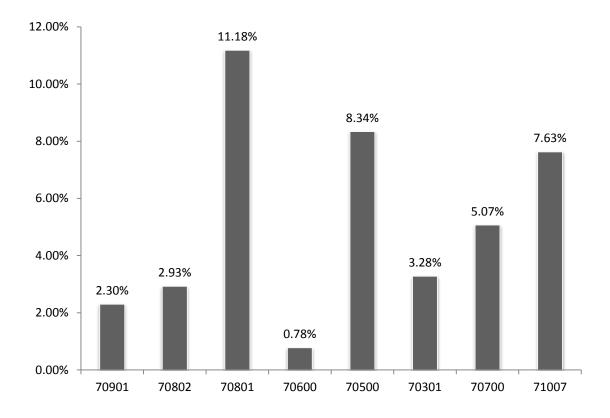


Figure 9 - Percent of Census Identifying Themselves as Race Other Than White or Black/African American

Figure 10 shows the population density of White residents in Floyd County and New Albany by census tract according the CPD maps, a HUD website. The majority of the census tracts with the lowest concentration of White residents are found in the through the center of New Albany. The City of New Albany has higher concentrations of White residents compared to its southern neighbor of Louisville, KY. Areas with very few concentrations of White residents are located across the Ohio River in Louisville.



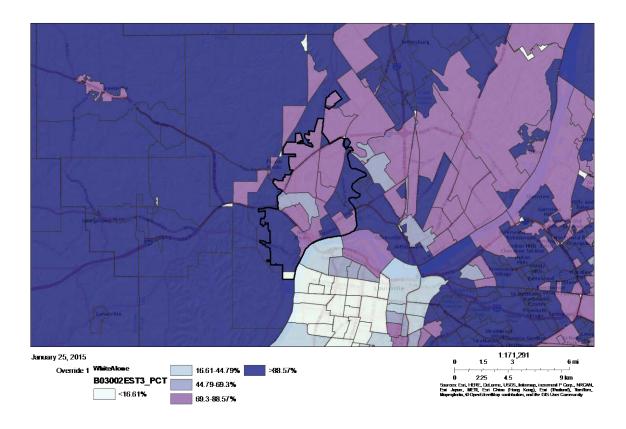


Figure 10 - Percentage of Population Identifying Themselves as White by Census Tract

Figure 11 shows the population density of African American residents in Floyd County and the City of New Albany by census tract using a HUD mapping tool. The majority of the census tracts with the highest concentration of African American residents are located in the center of New Albany and across the Ohio River in Louisville, KY. The areas surrounding New Albany, primarily rural counties in Southern Indiana have very low concentrations of African American Populations.



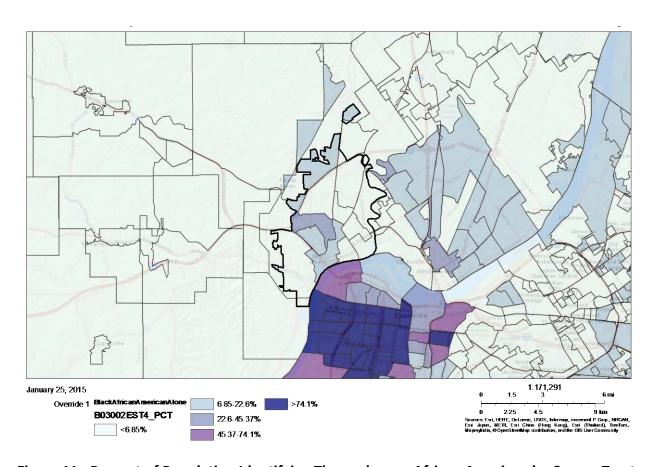


Figure 11 - Percent of Population Identifying Themselves as African American by Census Tract.

The City of New Albany is part of the Louisville, KY Metropolitan Statistical Area (MSA). Much of the American Community Survey Data available is for the MSA, not the individual City of New Albany. When comparing the percentage of population identifying themselves as minority races to that of the State of Indiana, more people in the State of Indiana identify themselves as a minority than Floyd County. A slightly higher percentage of the Louisville MSA identify themselves as either African American or Hispanic. This is due in part of the higher percentage of African Americans and other minorities living in Louisville, KY.



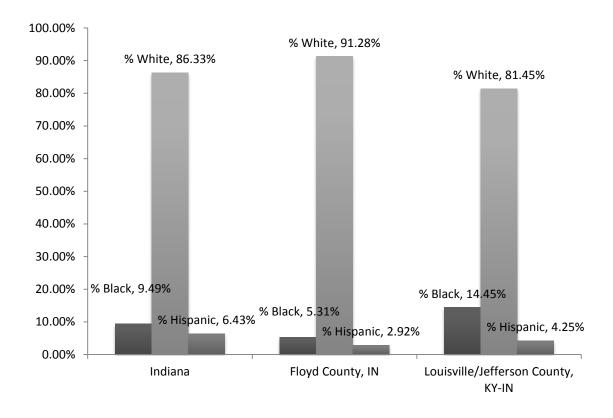


Figure 12 – Comparison of Floyd County, Louisville Metropolitan Statistical Area and State of Indiana

Many of the local service agencies work with low and moderate-income households from throughout Floyd County and the surrounding areas of southern Indiana. When examining race by township in Floyd County, the township of New Albany, an area slightly larger than the City of New Albany has a more diverse population. Figure 13 shows the map of the townships in Floyd County.



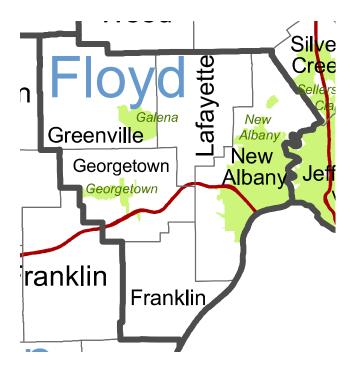


Figure 13 - Townships of Floyd County

The number of people identifying themselves as minority populations in the townships outside of New Albany is very low in number. Only 340 people identified themselves as a minority race in all of the townships combined, outside of New Albany Township, during the 2013 American Community Survey.

**Table 3 - Race Identification by Township** 

	Franklin	Georgetown	Greenville	Lafayette	New Albany
White	1,242	9,656	6,920	7,275	43,220
Black or African American	6	11	0	126	3,357
Other Minorities	0	67	56	74	1289

In New Albany Township, the number of people identifying themselves as a minority is much higher. Ten (10) percent of the population in New Albany Township identify themselves as a minority race.



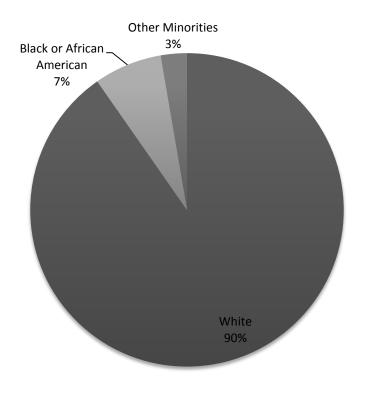


Figure 14 - Population by Race for New Albany Township

## Household Size and Characteristics

A household is defined as all the people permanently residing in a single housing unit, either related or unrelated. The total number of households in New Albany during the 2010 US Census was 15,575. There were 29,479 households in Floyd County in 2010. This was an increase of 1,968 households since 2000 when the total number of households in Floyd County was 27,511. This represents an increase of 8.0 percent over the ten-year time period. The average household size in 2010 was 2.5 persons per household.

The following charts and graphs represent the most current data available about households in Floyd County. Household size and characteristics can be tracked through information collected in the American Community Survey (ACS). The most recent ACS data available is from 2013.



Table 4 - Number of Households by Township

	Franklin	Georgetown	Greenville	Lafayette	New Albany
2013 Households	534	3,484	2,299	2,773	19,997

Household size is an important aspect of a community's demographic when considering housing needs. When redevelopment or new development takes place in a neighborhood, it is important to know what size of apartment or home is most likely to satisfy the needs of current and future community residents. The challenge encountered during urban redevelopment is the accurate estimation of household sizes to be planned for in redeveloped residential areas. Households found in redeveloped communities are unlikely to have the same size and makeup as those that occupied the site prior to redevelopment. This is because it is difficult to predict how this demographic will change because pre-redevelopment statistics will reflect the vacancies, inefficient land use, and financial losses that existed prior to the redevelopment project.

The average household size changes in Floyd County by the housing tenure. Owner occupied households are larger on average, even in New Albany Township, than renter occupied households. Table 4 shows the average size of household by owner occupied housing and rental occupied housing. In both cases, the average household size is much smaller in New Albany Township compared to the surrounding townships in Floyd County.

Table 5 - Average Household by Housing Tenure by Township

	Franklin	Georgetown	Greenville	Lafayette	New Albany
Average household size of owner-occupied unit	2.5	2.84	2.97	2.68	2.48
Average household size of renter-occupied unit	2.12	2.47	3.72	2.99	2.32

The City of New Albany has 15,575 households living within the City limits. The average household size in the City of New Albany in 2010 was 2.27 people. The majority of those living in households are family households (58.9 percent), with related people living under one housing unit. Of those living in families, 4,102 of the households have children under the age of 18.



Table 6 - Households in the City of New Albany

Total households	15,575	100.0
Family households (families)	9,175	58.9
With own children under 18 years	4,102	26.3

The households headed by a female in the City of New Albany have account for 18.2 percent of all households. Table 6 shows the number of female-headed households by township. Of the five townships in Floyd County, Georgetown, Lafayette and New Albany Townships have the highest percentages of the household population that is single female head of household. New Albany Township has the highest percent of the total households that are single female head of household at 17.3 percent.

Table 7 - Number of Female Headed Households by Township

	Franklin	Georgetown	Greenville	Lafayette	New Albany
Number of Households	10	362	136	309	3,454
Percent of Total Households	1.9	10.4	5.9	11.1	17.3

In addition to knowing the size of the household, developers need to know the needs of potential clients, specifically those with a disability. New Albany Township is also home to the most people living with a disability. Most people living with a disability are between the ages 18 and 64 years. People who are over age 65 represent the second largest group of people living with a disability. Table 8 shows the number of persons with a disability that are not living in an institution, such as a hospital, nursing home or other institution.

Table 8 - Non Institutionalized Persons with a Disability by Township

	Franklin	Georgetown	Greenville	Lafayette	New Albany
Total with Disability	256	861	637	658	7,494
Under 18 Yrs. with a Disability	11	81	32	44	753
18-64 Yrs. with a Disability	170	541	340	367	4,342
65 Yrs. and Older with a Disability	75	239	265	247	2,399



Table 9 - Number and Percent of People with Disabilities by Census Tract.

	70901	70802	70801	70600	70500	70301	70700	71007
	6,359	4,464	3,354	2,179	3,224	3,045	1,911	4,454
% Disabilities	15.08%	16.98%	22.08%	9.73%	14.42%	12.97%	16.26%	12.12%
Number with Disabilities	959	758	741	212	465	395	311	540

Table 8 shows the number of people living with a disability by census tract within the City of New Albany. Some of the Census Tracts are only partially located with the incorporated limits of the City of New Albany. The Census Tract 70801 has the highest percentage of the population living with a disability while Census Tract 70901 had the highest number of people living with a disability.



#### Economic Status and Income Distribution

Ball State University Center for Business and Economic Research published an economic document called the Indiana Economic Outlook 2014. The document looks at the national and state economic recoveries as well as that of Central Indiana. The introduction to this document includes the following statement:

The Louisville metro area saw a deceleration of payrolls over 2014. Year-over-year growth almost hit negative territory in the middle of the year, but payroll has been on the upswing since. The Southern Indiana part of the region observed steady growth, with most of these job gains occurring in Clark County. While payroll gains did not materialize at the rate expected in last year's Louisville outlook, the region did see additional declines in the unemployment rate. As 2014 came to a close, national payrolls were beginning to show additional gains, and the nation has now observed two back-to-back quarters of solid growth. We should expect to see continued payroll gains for the Louisville metro and Southern Indiana in 2015.

As with the demographic information, the City of New Albany will examine economic data and income information by both census tracts and townships across Floyd County.

One of the first economic factors to measure the success of the economy is to look at the unemployment rate. For the City of New Albany, the unemployment rate in September 2014 was 6 percent. For the Louisville Metropolitan Area, the unemployment rate was 5.8 percent. The rates is the 3 month average from the U.S. Bureau of Labor Statistics. Floyd County fares slightly better overall with a 5 percent unemployment rate. Figure 15 shows the unemployment rate by township.



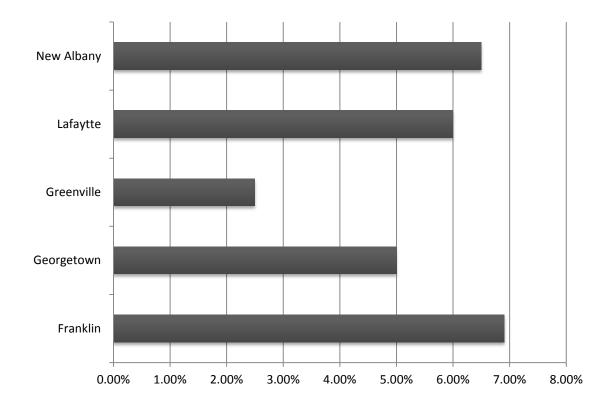


Figure 15 - Unemployment Rate by Township

Only Greenville and Georgetown Township have better or equal unemployment rates than the Floyd County unemployment rate. Franklin Township has the highest rate of unemployment at 6.9 percent. The New Albany Township rate is a close second with an unemployment rate of 6.5 percent.

Unemployment by census tract within the City of New Albany shows areas with even higher rates of unemployment. Three census tracts show higher unemployment than 12.41 percent. These areas are located toward the southern half of the City of New Albany. Figure 16 shows the unemployment rate by census tract.



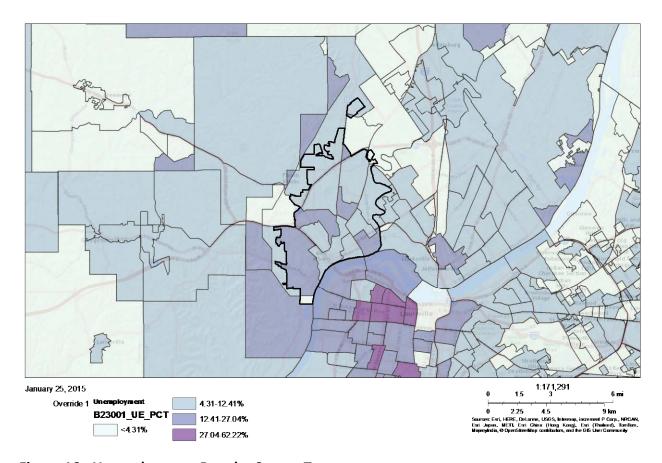


Figure 16 - Unemployment Rate by Census Tract

High unemployment rates can be an indicator of high poverty rates. Figure 17 is a map of the City of New Albany and surrounding areas showing the percentage of households living at or below the poverty level by Census Tract. High areas of poverty are also located in the same census tracts of high unemployment.



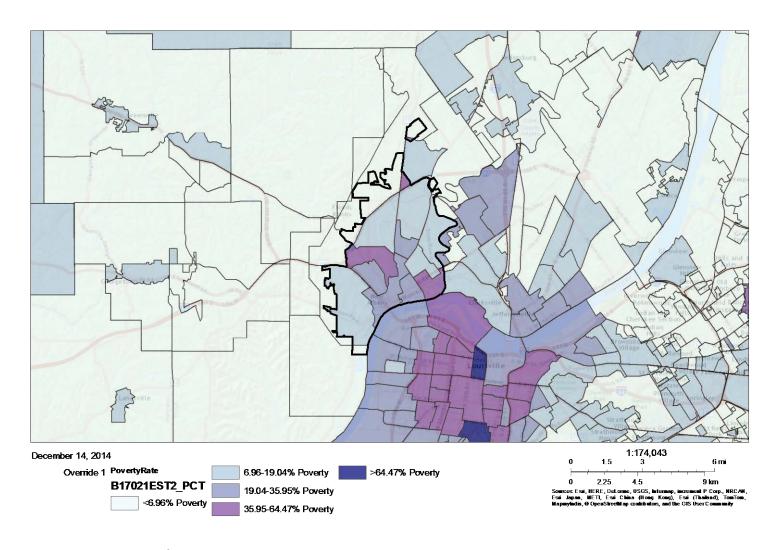


Figure 17 - Poverty Rate by Census Tract



For those individuals working in New Albany Township, they earned the lowest income of all townships. New Albany Township had a large increase in the median household income since 2000, a 13.6 percent growth. However, all the townships but one of the Floyd County townships had even greater increases in median household income.

Table 10 - Median Household Income by Township

	Franklin	Georgetown	Greenville	Lafayette	New Albany
2013 Median Household Income	\$57,500	\$72,799	\$81,581	\$80,680	\$44,243
2000 Median Household Income	\$51,573	\$58,388	\$59,323	\$61,313	\$38,939

Greenville Township had the highest increase in median household income increase since 2000 with a 37.5 percent increase. Lafayette Township is second with a 31.6 percent median household income since 2000. Figure 18 shows the increase of median household income from 2000 to 2013.

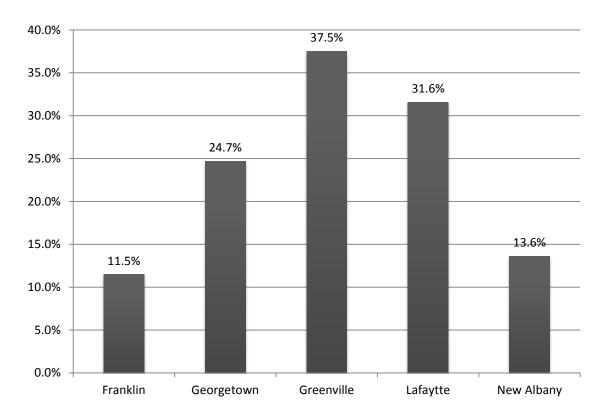


Figure 18 - Median Household Income - Increase from 2000-2013 by Township



Lafayette Township has the highest per capita income at \$30,146 per year and New Albany Township has the lowest per capita income at \$23,871 per year.

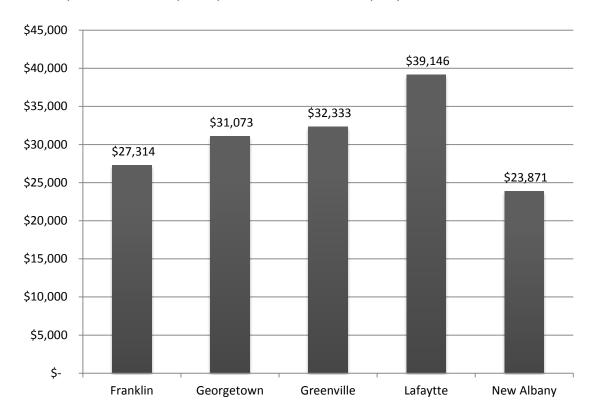


Figure 19 - Per Capita Income by Township

Social Security (SSA) program benefits include retirement income and Medicare. Residents of must be 62 years of age or older to receive SSA benefits. The program is designed to offer retirees retirement income and health benefits, supplementing other retirement funds. However many low income individuals do not have other funding resources and rely on SSA benefits alone in retirement. Table 10 shows the number and percent of the population that receive these benefits by township.



Table 11 - Number and Percent with SSA and SSI by Township

	Fra	anklin	Georg	getown	Gre	enville	Lafa	yette	New A	Albany
	#	%	#	%	#	%	#	%	#	%
With Social Security	136	25.50%	1,038	29.80%	613	26.70%	853	30.80%	5,976	29.9%
With Supplemental Security Income	44	8.20%	65	1.90%	41	1.80%	139	5.00%	1,088	5.4%

The Supplemental Security Income (SSI) program pays benefits to disabled adults and children who have limited income and resources. SSI benefits also are payable to people 65 and older without disabilities who meet the financial limits. While not every household that receives SSI is living with a disability, many people with a disability use this government assistance to help with daily living. Figure 10 shows that most of those utilizing SSI are living within New Albany Township.

Although the majority live within New Albany Township, the mean or average income per year by these households is in the middle of the pack of average earnings by Township. Table 11 shows households in Franklin and Georgetown Townships have average SSA earnings lower than households in New Albany Township. Households in Franklin, Georgetown and Lafayette Townships all have average SSI earnings less than households in New Albany Township.

Table 12 - Mean SSA and SSI Wages by Township

	Franklin	Georgetown	Greenville	Lafayette	New Albany
Mean Social Security income (dollars)	\$16,138	\$18,689	\$20,037	\$20,412	\$17,422
Mean Supplemental Security Income (dollars)	\$9,100	\$9,275	\$12,051	\$8,892	\$9,594

For those employed in the City of New Albany, the community has a large number of professions/occupations available for individuals to choose from. According to the U.S. Bureau



of Labor Statistics, in May 2013, the Louisville Metropolitan Statistical Area had a total of 609,220 occupations with an average wage of \$45,461 annually. Table 12 lists the general categories of occupations and the mean annual wage for each category. Management occupations fared the best with a mean annual wage of \$93,840 while food preparation and serving related occupations fared the worst with a mean annual wage of \$20,170. Office and administrative support occupations were the most in number with 96,410 jobs and farming, fishing and forestry occupations were the least in number with 650 jobs.

Table 13 - Number and Mean Wage by Occupation Type for Louisville MSA

	#	Mean Annual
Occupation Type/Category	Occupations	Wage
Architecture and Engineering Occupations	8,120	\$70,700
Arts, Design, Entertainment, Sports, and Media Occupations	6,540	\$40,220
Building and Grounds Cleaning and Maintenance		
Occupations	16,130	\$24,270
Business and Financial Operations Occupations	25,730	\$60,040
Community and Social Service Occupations	7,080	\$40,470
Computer and Mathematical Occupations	<b>12,</b> 870	\$66,440
Construction and Extraction Occupations	20,480	\$41,960
Education, Training, and Library Occupations	28,770	\$51,210
Farming, Fishing, and Forestry Occupations	650	\$25,660
Food Preparation and Serving Related Occupations	57,200	\$20,170
Healthcare Practitioners and Technical Occupations	39,640	\$68,080
Healthcare Support Occupations	17,460	\$28,080
Installation, Maintenance, and Repair Occupations	27,710	\$44,500
Legal Occupations	3,620	\$69,310
Life, Physical, and Social Science Occupations	2,340	\$52,200
Management Occupations	29,000	<i>\$93,840</i>
Office and Administrative Support Occupations	96,410	\$33,480
Personal Care and Service Occupations	17,740	\$23,130
Production Occupations	58,910	\$36,110
Protective Service Occupations	12,030	\$35,390
Sales and Related Occupations	60,480	\$37,650
Transportation and Material Moving Occupations	60,310	\$37,230



## **III: Housing Profile**

In June 2014, the Louisville/Jefferson County housing market was listed as the strongest housing market in the country. An article by USAToday, *Louisville Housing Market is No. 1, but the Numbers are Wonky* states because the area is a middle market and neither experienced a boom nor a bust, thus the area has had steady growth over the past seven years.

While many of these housing markets may be healthy, their home prices relative to median incomes tended to be quite high. According to Blomquist, when home prices start to outpace incomes, there is cause for concern. Homes in half of the counties that have grown the most were valued at more than four times estimated median household income for 2014, higher than in most counties.

The average home price in Jefferson County, which merged with the city of Louisville in 2003, was just \$73,879 in 2009, among the lower average home prices nationwide. Since then, however, home values have increased dramatically, rising every year to reach \$160,000 on average in 2014. As a result, the area's home prices are up 63% from Jefferson County's 2007 average home price of \$92,133. Foreclosures, too, are on the decline, having fallen 33% between the first quarter of 2013 and the first quarter of 2014. A report from the Federal Reserve Bank of St. Louis last year profiled Louisville as an example of a metro area that had successfully transitioned from an industrial to a service-based economy.

Through consultation, many of the stakeholders suggested that the cost of housing often exceeds what many people in the area can afford. The housing profile will examine the housing market in further detail to determine if any households have a disproportionate need.

### **Housing Affordability**

Affordable housing is not necessarily low-income housing or public housing. Affordable housing is housing that costs less than 30 percent of a household's gross monthly income. Households who spend more than 30 percent of their gross month income towards housing costs are considered to have a cost burden. By evaluating the number of households with cost burden, the City of New Albany may determine if there is a shortage in affordable housing for its population.

A large number of households spend more than 30 percent of their gross monthly income towards housing costs. By spending more than 30 percent of the gross monthly income, the household is considered to have a housing problem or a cost burden by the U.S. Department of Housing and Urban Development (HUD).

There is a higher level of cost burden, called Severe Cost Burden, where a household spends more than 50 percent of their gross monthly income towards housing costs. This is particularly difficult for these households to prepare or save for any emergency when most of their income



goes towards housing. Table 13 shows the total number of owners and renters with both cost burden and severe cost burden according to the HUD CHAS data.

Table 14 - Cost Burden and Severe Cost Burden for the City of New Albany

Cost Burden	# Owners	% Owners	# Renters	% Renters
Greater than 30%	1,529	17.6%	2,830	41.9%
Greater than 50%	514	5.9%	1,415	21.0%

Renters have a much higher rate of cost burden than homeowners. Over 41 percent of renters pay more than 30 percent of the household's gross monthly income towards housing, or has a cost burden. Nearly one quarter of renters have a severe cost burden, spending more than 50 percent of the household's gross monthly income towards housing costs.

Data for severe cost burden is not available at the township level. Rather, the 2013 American Community Survey three year estimates measure the number of households paying 30-34 percent of their gross monthly income towards housing and the number of households paying more than 35 percent of their gross monthly income towards housing.



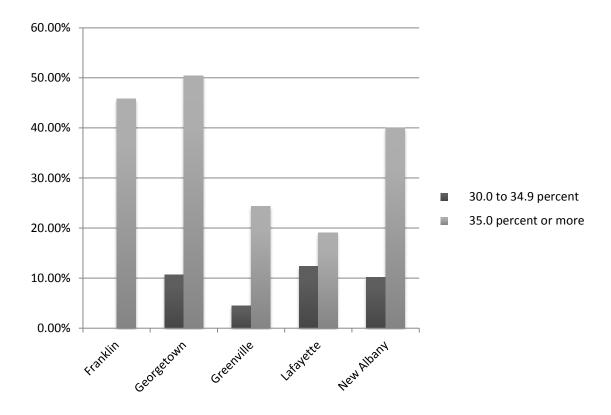


Figure 20 - Cost Burden by Township for Renter Households

Georgetown Township has the largest percentage of renters with cost burdens, with 50.4 percent of all renters experiencing a cost burden. However, renters in all townships experience cost burdens at a high rate, with most townships having between 20 and 50 percent of all renters experiencing a cost burden. For those experiencing a cost burden, most renter households spend more than 35 percent of the household's gross monthly income towards housing costs.

This document has already established that homeowners in the City of New Albany have a lower rate of cost burden than rental households. That trend continues when looking at all the townships within Floyd County. Looking at the data by township, an interesting phenomenon appears. Figure 22 shows homeowners in all townships of Floyd County with cost burden, both with a mortgage and without a mortgage. In four out of the five townships, 6 to 14 percent of homeowners without a mortgage still have a cost burden of 35 percent or more. Meaning 6 to 14 percent of homeowners without a mortgage are still paying more than 35 percent of their gross monthly income towards housing costs.



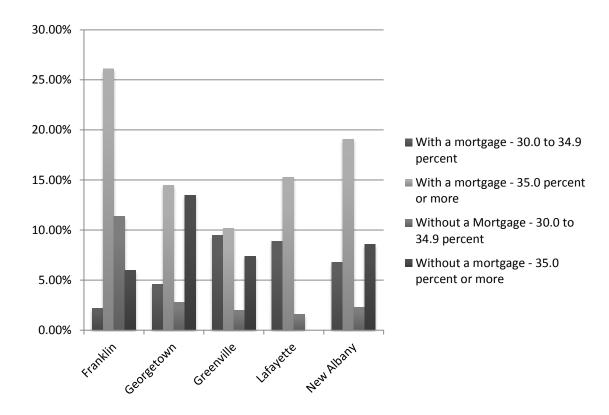


Figure 21 - Homeowners with a Cost Burden

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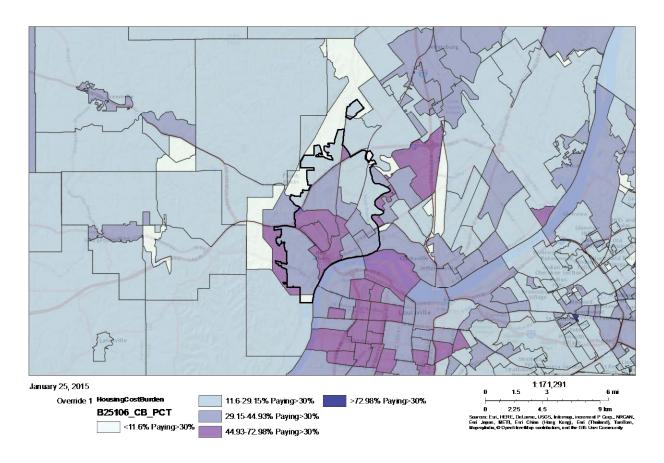


Figure 22 - Housing Cost Burden by Census Tract - CPD Maps

Figure 23 shows where in the community people are experiencing a cost burden, both renter and homeowner. The majority of them match the same neighborhoods with high concentrations of minority households and households living in poverty, which are located in the middle sections the City of New Albany.

The question becomes where are units affordable to renters in the City of New Albany? The next three maps, Figures 24-26, show the areas in which rental units are affordable to different income levels. Units affordable to low income renters are concentrated to the center and southern portions of the City of New Albany.

The maps refer to HAMFI, which means HUD Area Median Family Income. Despite the difference between households and families, the HAMFI refers to the number of people living in one household. The dollar amount of HAMFI is dependent on the size of the household, increasing with the number of people in the household. Table 14 shows the HAMFI by household number for 2014 in the Louisville MSA.



Table 15 - 2014 Income Limits for the Louisville MSA

	1 person	2 person	3 person	4 person	5 person	6 person	7 person	8 person
0-30 HAMFI	\$13,400	\$15,730	\$19,790	\$23,850	\$27,910	\$31,970	\$36,030	\$40,090
31-50 HAMFI	\$22,300	\$25,450	\$28,650	\$31,850	\$34,400	\$36,950	\$39,500	\$42,450
51-80 HAMFI	\$35,650	\$40,750	\$45,850	\$50,950	\$55,050	\$59,150	\$63,200	\$67,300

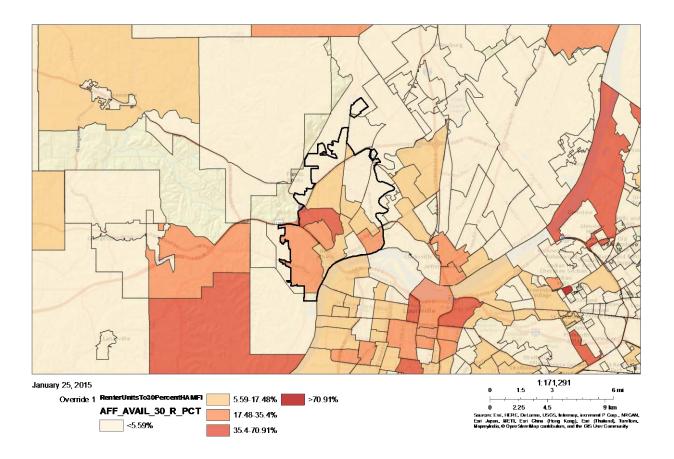


Figure 23 - Percent of Rental Units Affordable to Households Earning 30 Percent HAMFI or Less

The maps in this sections show how few units are available to those households earning the lowest incomes. Areas with greater numbers of affordable units to extremely low-income households are the same areas of poverty and housing cost burden in Figure 22.



All rental units affordable to households earning between 31 and 80 percent of the area median family income are also located in the same areas, although in greater numbers. Figures 24 and 25 show as income increases, the number of rental units affordable to those incomes the increase in number as well.

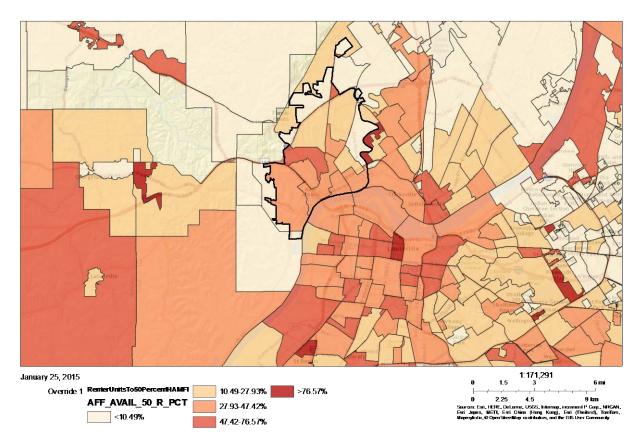


Figure 24 - Rental Units Affordable to Households Earning 31-50 Percent HAMFI - CPD Maps Tool



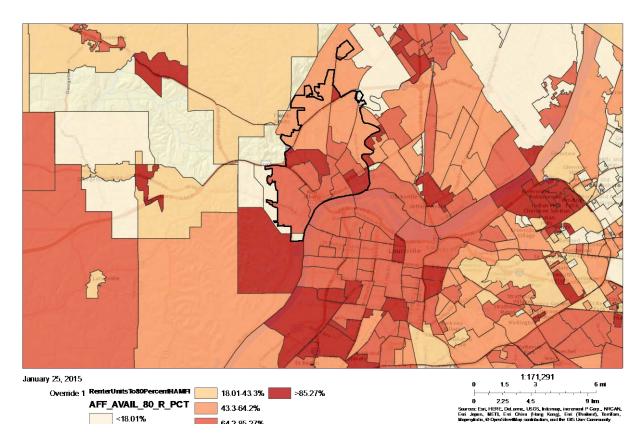


Figure 25 - Rental Units Affordable to Households Earning 51 to 80 Percent HAMFI - CPD Maps Tool



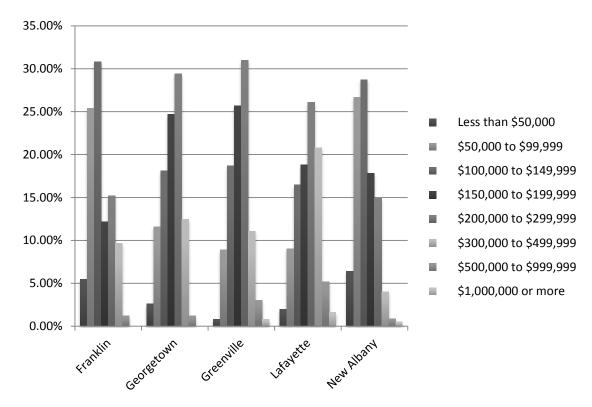


Figure 26 - Percent of Units by Value and Township

New Albany Township have the highest percentage of homes valued at \$150,000 or less, making it a more affordable place to live for moderate and low income homeowners. However, Franklin Township has the lowest median home value, \$126,000, of owner occupied units, just under the median value in New Albany Township. Lafayette Township has the highest median value. \$212,800, of all the townships in Floyd County. The median value in the City of New Albany in the 2013 American Community Survey was \$112,800. The median values by township are shown in Figure 27.



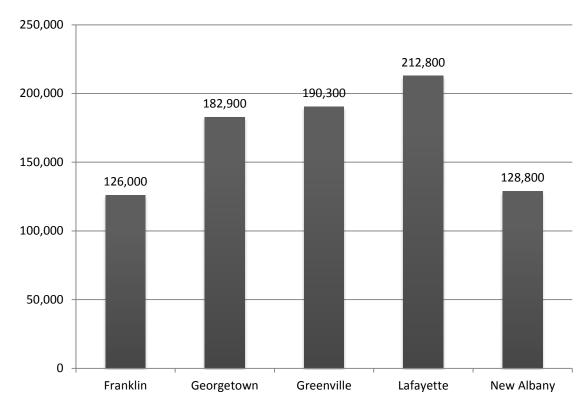


Figure 27 - Median Housing Value by Township

# Living Wage<sup>2</sup>

Recent news and debate have taken place on the need to increase the minimum wage for fast food workers to a living wage. While there are two sides of the debate with many people on each side, it brings to light that the minimum wage is different from a living wage. At the time of the publication of this document, a bill to raise the minimum wage to \$10.10 was under consideration by the Indiana General Assembly. The National Low Income Housing Coalition conducts an annual study called *Out of Reach*, a study that looks at what an hourly wage needs to be for a household to afford a place to rent without working more than the standard 40-hour workweek – a living wage.

The study compares the fair market rents for an area to the rents affordable at different wages, including minimum wage, average SSI payments, etc. Fair Market Rents are the 40th percentile of gross rents for typical, non-substandard rental units occupied by recent movers in a local housing market, meaning 40 percent of the rents are less expensive and 60 percent of the

<sup>&</sup>lt;sup>2</sup> Housing statistics and living wage information was compiled by the National Low Income Housing Coalition and City Consultants and Research, LLC.



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rental units are more expensive. The fair market rate increases with the number of bedrooms as part of the housing unit.

Table 16 - Fair Market Rents for Louisville MSA

Zero bedroom	One bedroom	Two bedroom	Three bedroom	Four bedroom
FMR	FMR	FMR	FMR	FMR
\$507	\$592	\$737	\$1,020	\$1,154

The minimum wage in the City of New Albany in 2014 is \$7.25 per hour. Working 40 hours per week, a person will earn \$15,080 per year. The rent payment affordable to a person earning minimum wage is \$377 per month. A person will need to work 54 hours a week to afford a studio apartment with no bedrooms. For a two-bedroom apartment, a person working minimum wage will need to work 82 hours per week, over double the typical workweek.

The picture is bleaker for recipients of SSI payments. The mean monthly payment from SSI is \$721 per month, meaning the rent affordable to a household or person with only SSI for income is \$261 per month. No apartments in New Albany at fair market rent are affordable to persons with only SSI payments as income.

To afford the fair market rents in New Albany/Floyd County, a household needs to earn a living wage, or a wage that enables them to work 40 hours per week and only pay 30 percent of their income towards housing. For a two-bedroom apartment in New Albany, the living wage needs to be \$14.17 per hour. This represents a wage need to be earned by the entire household to afford a two-bedroom unit. This does not account for other costs that may be associated with a multiple wage earners, such as day care, transportation, etc.

In 2014, the Area Median Income (AMI) for New Albany, which is part of the Louisville Metropolitan Statistical Area, is \$64,300 annually. With the U.S. Department of Housing and Urban Development (HUD) established affordability at 30% of a household's gross monthly income, the maximum housing costs a household at 100% AMI is \$1,608 per month. Table III-II shows the maximum housing costs for each income level used by HUD.



Table 17 - Maximum Affordable Housing Cost by Income

HAMFI Income Level	Affordable Housing Cost
30%	\$482
50%	\$804
80%	\$1,286
100%	\$1,608

Households earning minimum wage or SSI need other assistance to afford decent housing, such as rental subsidies or Section 8 Vouchers. These types of programs allow persons to pay just 30 percent of their income towards housing while the assistance pays the remaining amount of rent. Thus, if a minimum wage worker needs a two-bedroom unit at \$737 per month, he or she would pay the \$377 towards rent and the subsidy would cover the remaining \$360.

Another programs to help reduce the cost of rents is called the Low Income Housing Tax Credit. These funds come from the federal government through the State to develop affordable, multifamily rental housing. The U.S. Department of Housing and Urban Development sets rent levels, which multi-family developments cannot exceed when charging rent. These rents are set to ensure affordability for low-income households.

Table 18 - 2014 HOME Rent Limits for Louisville MSA

	0 BRM	1 BRM	2 BRM	3 BRM	4 BRM	5 BRM	6 BRM
Low HOME Rent Limit	\$485	\$567	\$705	\$830	\$926	\$1,021	\$1,116
High HOME Rent Limit	\$485	\$567	\$705	\$976	\$1,104	\$1,245	\$1,345

Even at these levels, not every household can afford these rent levels. Some extremely low-income households cannot pay 30 percent of their gross monthly income towards housing and afford rent at the HOME levels. This is true for those earning minimum wage or just receiving SSI payments. Table 18 shows the monthly and hourly income needed to afford the low HOME rents. Developers can ask for lower rents; however, the HOME rents may be the lowest possible levels to keep a development financially feasible over the long term life of the development. Any lowering of rent would require greater amounts of capital investment into the building to lower debt burden of the owner or monthly subsidy payments such as Section 8 Vouchers.



**Table 19 - Income Needed to Afford Low HOME Rent** 

	0 BRM	1 BRM	2 BRM	3 BRM	4 BRM	5 BRM	6 BRM
Monthly Wage needed to afford low HOME Rent Limit	\$1,617	\$1,890	\$2,350	\$2,767	\$3,087	\$3,403	\$3,720
Hourly wage	\$9.33	\$10.90	\$13.56	\$15.96	\$17.81	\$19.63	\$21.46



## **HMDA** Analysis

Information contained in the following tables comes from the online reports available from the Federal Financial Institutions Examination Council (FFIEC). The FFIEC is responsible for the collection and administration of the Home Mortgage Disclosure Act (HMDA) reporting data that financial institutions are required to submit. The most recent data available comes from the 2013 calendar year and is only available at the county level for the City of New Albany.

In Floyd County, 4,293 home loan applications were filed during 2013. The home loan applications fell into one of the following four categories: (1) Government Guaranteed Home-Purchase, (2) Conventional Home-Purchase, (3) Refinancing, and (4) Home Improvement. By far, refinancing loans and conventional home loans are the two largest percentages of the 2013 home loan application pool. Applications for loans to refinance an existing home purchase loan made up slightly over 63.27 percent of all applications and conventional home loans made up nearly 18.73 percent of all applications, totaling 82 percent. The remaining 18 percent of the total home loan applications was comprised of home improvement loan applications (6.29 percent) and government guaranteed loan applications (11.72 percent).

Figure 1 illustrates the total number of home loan applications made by loan type. The total applications received are further categorized by final loan status. 62.24 percent of all applications resulted in a loan origination. Nearly 21 percent were denied. The remaining applications were deemed incomplete, not accepted or withdrawn.

Table 20 - Number of Loans by Type

	Government Guaranteed Home Purchase	Conventional Home Purchase	Refinance	Home Improvement	Total
Loans Originated	352	574	1,603	143	2,672
Applications Approved, Not Accepted	22	61	156	17	256
Applications Denied	90	104	599	96	889
Applications Withdrawn	29	51	230	10	320
Applications Determined Incomplete	10	14	128	4	156
Total Loan Applications Received	503	804	2,716	270	4,293



Conventional Home Purchases had the highest rate of loan origination, with 71.39 percent of all applications resulting in a loan. Government Guaranteed Home Purchases had a slightly lower rate of approvals, with 69.98 percent of all applications resulting with a loan. Both categories had low denial rates, reaching only 12.94 percent and 17.89 percent respectfully.

On the opposite side of the spectrum, Home Improvement loans had the highest denial rate, with a 35.56 percent rate of denial. This document, in later sections, will examine further statistical data connected to such a high denial rate.

Applicants seeking to refinance their mortgage, experienced loan originations and loan denials with 59.02 percent and 22.05 percent rates respectively. Figure 29 shows the difference in originations versus denials for each loan type.

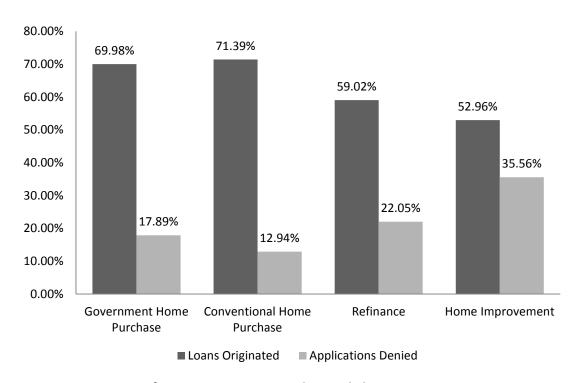


Figure 28 - Percent of Loan Originations and Denials by Type



#### -Government Guaranteed Home - Purchase loans-

In 2013, Government Guaranteed Home-Purchase (government guaranteed) loan applications made up 11.72 percent of the total home loan applications in Floyd County. A government guaranteed loan is available through and secured by the federal government of the United States. Government guaranteed loans are offered by three different agencies, the Federal Housing Administration (FHA), the Veterans Association (VA) and the United States Department of Agriculture (USDA).

The FHA loan is characterized by a fixed rate mortgage accessible to first-time and low-to-moderate income buyers. It is easier for these buyers to qualify for the FHA loan because it requires a smaller down payment (usually around 3 percent) and the interest rate is typically lower than those available from a Conventional Home-Purchase loan. Government guaranteed loans are only available to purchase homes that will be owner occupied.

The VA offers government guaranteed mortgages to individuals with a history of active military service or those individuals who have survived the death of a spouse that was an active service member. If an individual applicant meets the criteria and can prove the ability to make monthly payments, a VA home mortgage can be obtained with little or no down payment.

The USDA administers the Rural Development Guaranteed Housing loan program that provides mortgages for low-to-moderate income individuals wanting to purchase a home in an area that is designated a Rural Development area by the USDA. Applicants with a less-than-perfect credit history are able to qualify for this loan when they may not be able to qualify for a conventional loan because the USDA guaranteed loans do not require a down payment or mortgage insurance.

503 applications were made for government guaranteed loans and 90 were denied. Denials are based on an applicant's rating in one of the following nine evaluation areas:

- debt to income ratio;
- employment history;
- credit history;
- collateral;
- cash accounts;
- quality of information given in application;
- completeness of application;
- mortgage insurance availability; or
- "other."



Table 20 shows the total number of applicants denied government guaranteed loans in the Louisville/Jefferson County for the year 2013, categorized by race and ethnicity. A report for Floyd County by itself was not available. A problem with credit history is cited as the most common reason for denial in this loan type. 30.86 percent of the total application denials were denied for this reason. The second highest reason for denial in this loan type is cited as a problem with the applicant's debt to income ratio. 20.09 percent of the total application denials were denied for this reason.

The third most common reason for denial in this loan type is for credit application incomplete. 13.87 percent, of the total denials made were denied for this reason.



Table 21 - Number of Government Guaranteed Loans Denied by Race and Ethnicity

	Debt to Income Ratio	Employment History	Credit History	Collateral	Insufficient Cash	Unverifiable Information	Credit Application Incomplete	Mortgage Insurance Denied	Other	Total
Race	110110	riistory	· iiscoi y	Conacciai	Gusti		meompiece	Derned	<b>C</b> triei	10141
American Indian or Alaska Native	0	0	0	0	0	0	0	0	0	0
Asian	6	2	1	2	2	0	0	0	1	14
Black or African American	24	4	38	9	10	3	13	0	7	108
Native Hawaiian or Other Pacific Islander	1	0	0	1	0	1	0	0	0	3
White	176	48	278	107	42	43	134	2	89	919
Two or More Minority Races	1	0	0	0	0	0	0	0	1	2
Joint (White/ Minority Race)	2	0	4	1	0	0	1	0	2	10
Race Not Available	23	8	37	7	5	3	13	0	8	104
Total by Race	233	62	358	127	59	50	161	2	108	1,160



	Debt to Income Ratio	Employment History	Credit History	Collateral	Insufficient Cash	Unverifiable Information	Credit Application Incomplete	Mortgage Insurance Denied	Other	Total
Ethnicity										
Hispanic or Latino	14	2	17	5	5	5	5	0	1	54
Not Hispanic or Latino	192	51	299	116	48	40	140	2	97	1,558
Joint (Hispanic or Latino/Not Hispanic or Latino)	1	1	4	0	1	1	3	0	1	12
Ethnicity not available	26	8	38	6	5	4	13	0	9	109
Total by Ethnicity	233	62	358	127	59	50	161	2	108	1,160
Percent of Total	20.09%	5.34%	30.86%	10.95%	5.09%	4.31%	13.87%	.17%	9.31%	100%



Examining the data by race, White applicants comprised 82.50 percent of all applicants for government guaranteed financing, but only accounted for 79.22 percent of the total applicants denied. African American applicants comprised 7.44 percent of all applicants for government guaranteed financing, but accounted for 9.31 percent of all applicants denied financing. A higher proportion of African American applicants were denied government guaranteed financing than the total make-up of the applications by almost 2 percent. Conversely White applicants made up a lesser proportion of total applicants denied at a rate of 3.28 percent less. The remaining 11.47 percent of applicants denied a loan equate the proportion of their races combined in the applicant pool.

Applicants that classified themselves as Hispanic made up 4.66 percent of the total government guaranteed applications denied. Out of the 8,127 applications filed, Hispanic applicants account for 2.85 percent of applicants. This also shows a disproportionate amount of Hispanics were denied government guaranteed financing. Both Hispanics and African American applications are denied government guaranteed financing at a rate of 34 percent higher than the portion of their race or ethnicity in the total applicant pool.

The data available through the Federal Financial Institutions Examination Council (FFIEC) online reports also allows for applications to be tracked by an applicant's income. Applicants with the lower incomes experienced a higher denial rate than applicants with higher incomes. Credit history continues to be the number one reason for a denial despite income levels. This data suggests that education on the importance of credit may change the numbers at the income level. Table 21 shows the reasons for denial by income.

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Table 22 - Number of Government Guaranteed Loans Denied by Income

	Debt to Income Ratio	Employment History	Credit History	Collateral	Insufficient Cash	Unverifiable Information	Credit Application Incomplete	Mortgage Insurance Denied	Other	Total
Less Than 50% of MSA Median	111	35	92	34	19	21	27	0	22	361
50 – 79% of MSA Median	59	14	112	45	14	14	47	1	33	339
80 – 99% of MSA Median	23	7	66	11	11	6	17	1	16	158
100 – 119% of MSA Median	16	1	34	8	6	3	16	0	15	99
120% or More of MSA Median	22	4	51	27	9	4	50	0	21	188
Income Not Available	2	1	3	2	0	2	4	0	1	15
Total	233	62	358	127	59	50	161	2	108	1,160



### -Conventional Home-Purchase Loans-

804 applications for Conventional Home-Purchase (conventional) loans were submitted in 2013 for Floyd County and 14,542 Conventional Home-Purchase for Louisville/Jefferson County. This makes up 18.73 percent of the total home loan applications for Floyd County. Conventional loans to purchase housing are made by private financial institutions. The terms to qualify for these loans will vary based on the individual underwriting at each institution. Furthermore, the down payment amount and interest rates will vary based on the way an applicant scores on their application. 3,428, or 23.57 percent, of applicants were denied conventional financing to purchase a home in Louisville/Jefferson County. Information was not available for Floyd County.

The most common reason for a denied conventional loan application cited by the HMDA data tables is credit history. 958, or 27.95 percent, of the total denials for this loan type were made for this reason.

The second most common reason for a conventional loan application denial was a problem with the applicant's debt to income ratio. 672, or 19.6 percent, of the total denials for this loan type were made for this reason. There is an eight-percentage point difference between the top two reasons for loan denials in the conventional market. This could be a result of the depressed housing market, lower housing values, tighter underwriting criteria and debt-loaded applicants.

The other category is not defined by HMDA but may be explained by the current drop in real estate values across the country and the resulting discrepancy between what the buyers and sellers agree to as the price for and what the bank is willing to loan on a property. This denial is likely to take place during the underwriting phase of the loan process. In 2013, 7.82 percent of the denials in the Louisville/Jefferson County for this loan type were made for this reason.

Table 22 shows the reasons for denials in the conventional loan market by race and ethnicity.



Table 23 - Number of Conventional Home Purchase Loans Denied by Race and Ethnicity

	Debt to Income Ratio	Employment History	Credit History	Collateral	Insufficient Cash	Unverifiable Information	Credit Application Incomplete	Mortgage Insurance Denied	Other	Total
Race										
American Indian or Alaska Native	2	0	2	0	0	0	0	0	0	4
Asian	6	1	4	4	1	2	9	0	4	31
Black or African American	23	3	41	7	7	4	8	1	5	99
Native Hawaiian or Other Pacific Islander	2	0	1	1	1	0	0	0	1	6
White	274	47	378	237	67	58	223	9	108	1,401
Two or More Minority Races	0	0	0	0	0	0	0	0	0	0
Joint (White/Minority Race)	1	1	10	1	0	0	3	0	2	18
Race Not Available	28	4	43	26	10	7	23	0	14	155



	Debt to Income Ratio	Employment History	Credit History	Collateral	Insufficient Cash	Unverifiable Information	Credit Application Incomplete	Mortgage Insurance Denied	Other	Total
Ethnicity										
Hispanic or Latino	15	3	17	7	4	8	2	0	5	61
Not Hispanic or Latino	287	47	404	239	71	57	238	10	109	1,462
Joint (Hispanic or Latino/Not Hispanic or Latino)	5	1	4	6	0	1	3	0	3	23
Ethnicity not available	29	5	54	24	11	5	23	0	17	168
Total	672	112	958	552	172	142	532	20	268	3,428



When examining this information by race, a similar trend of the government guaranteed loans occurs in the conventional market. Whites make up 84 percent of the total conventional loan applications while only making up 40.87 percent of the total denials. African Americans make up 2.74 percent of the total applications for conventional loans while making up 2.89 percent of the denials. 1.78 percent of the applicants denied conventional loan applications made were Hispanic. Hispanic applicants comprised 2.39 percent of the total applicants for conventional home financing.

Credit history and debt to income ratio are the top reasons for denial of conventional loans. However, credit history is the number one reason for loan application denials for low to moderate income applicants, or those earning 80 percent or less of the area median income. For those applicants earning more than 80 percent of the area median family income, credit history is the number one reason they are denied a conventional loan. This can be due to the requirements for obtaining a convention home loan. Table 23 shows the reason for loan denials at each income level.



Table 24 - Number of Conventional Home Purchase Loans Denied by Income

	Debt to Income Ratio	Employment History	Credit History	Collateral	Insufficient Cash	Unverifiable Information	Credit Application Incomplete	Mortgage Insurance Denied	Other	Total
Less Than 50% of MSA Median	94	19	112	32	15	20	32	0	15	339
50 – 79% of MSA Median	78	11	132	50	15	10	54	1	34	385
80 – 99% of MSA Median	41	3	59	38	12	6	26	0	13	198
100 – 119% of MSA Median	27	4	45	21	7	5	31	3	10	153
120% or More of MSA Median	87	16	120	131	36	25	120	6	53	594
Income Not Available	9	3	11	4	1	5	3	0	9	45
Total	336	56	479	276	86	71	266	10	134	1,714



# - Home Loan Refinancing -

Homeowners looking to refinance their existing mortgages submitted the largest percentage of 2013 total home loan applications in the county. With 4,293 total applications, Home Loan Refinancing (refinancing) applications accounted for over 63 percent of the total home loan applications in Floyd County. In Louisville/Jefferson County of the total applicants, 79.94 percent were White, 5.95 percent were African American, and 2.7 percent was an individual that classified themselves as one of the other minority races. Race information was not available for 11.41 percent of the total applicants.

18,188, or 42.98 percent, were denied based on a poor application score in one of the basic nine evaluation areas. The top two reasons for denial were collateral and credit history.

Out of the 31.02 percent of applicants denied a loan due to a perceived problem with their credit history, 73.39 percent were White, 8.76 percent were African American and 3.45 percent was one of the other racial minorities. African Americans accounted for 8.76 percent of the applications; however, they made up 10.24 percent of the denials based on credit history. This represents an 85.55 percent difference in the amount of denials over the percent of applications they represent.

This situation is similar for Hispanic applicants. In 2013, those applicants that classified themselves as Hispanic made up 1.84 percent of the total refinancing applications denied. Out of the 42,319 applications filed in Louisville/Jefferson County, Hispanics account for 1.19 percent of applicants.

Collateral and credit history are the top reasons for denial of home refinance loans. Credit history is the number one reason for loan application denials for both low to moderate income applicants and applicants earning more than 80 percent of the area median income. Debt to income ratio is the second reason for denial for applicants earning less than 80 percent of the area median income. This could be due to the unemployment rates; however, there is no definite answer for this reason used as such a high frequency.

Tables 24 and 25 show the reason for loan denials by race, ethnicity and income level.



Table 25 - Number of Refinance Loans Denied by Race and Ethnicity

	Debt to Income Ratio	Employment History	Credit History	Collateral	Insufficient Cash	Unverifiable Information	Credit Application Incomplete	Mortgage Insurance Denied	Other	Total
Race										
American Indian or Alaska Native	8	0	11	7	4	0	4	0	5	39
Asian	39	5	44	25	8	7	12	0	26	166
Black or African American	99	7	289	152	68	15	74	5	88	797
Native Hawaiian or Other Pacific Islander	5	0	7	4	0	1	3	0	1	21
White	1,172	88	1,913	1,373	428	234	746	9	711	6674
Two or More Minority Races	1	0	2	1	1	0	3	0	0	8
Joint (White/Minority Race)	15	1	23	13	6	3	10	0	5	76
Race Not Available	193	15	532	216	40	43	120	0	154	1,313
Total	1,532	116	2,821	1,791	555	303	972	14	990	9,094



	Debt to Income Ratio	Employment History	Credit History	Collateral	Insufficient Cash	Unverifiable Information	Credit Application Incomplete	Mortgage Insurance Denied	Other	Total
Ethnicity										
Hispanic or Latino	29	3	65	19	6	6	23	0	16	167
Not Hispanic or Latino	1,305	99	2,210	1,540	507	248	829	14	817	7,569
Joint (Hispanic or Latino/Not Hispanic or Latino)	7	1	13	6	2	3	6	0	3	41
Ethnicity not available	191	13	533	226	40	46	114	0	154	1,317
Total	1,532	116	2,821	1,791	555	303	972	14	990	9,094



Table 26 - Number of Refinance Loans Denied by Income

	Debt to Income Ratio	Employment History	Credit History	Collateral	Insufficient Cash	Unverifiable Information	Credit Application Incomplete	Mortgage Insurance Denied	Other	Total
Income										
Less Than 50% of MSA Median	517	28	488	179	59	48	135	4	137	1,595
50 – 79% of MSA Median	378	32	680	366	114	63	216	2	185	2,036
80 – 99% of MSA Median	180	7	360	249	69	23	111	4	109	1,112
100 – 199% of MSA Median	118	10	327	182	63	23	81	0	92	896
120% or More of MSA Median	278	28	792	749	211	109	359	4	342	2,872
Income Not Available	61	11	174	66	39	37	70	0	125	583
Total	1,532	116	2,821	1,791	555	303	972	14	990	9,094



## - Home Improvement Loans -

Home Improvement loan applications accounted for 6.29 of the total loan applications for Floyd County. Of the total applicants for Louisville/Jefferson County, 70.05 percent were White, 14.2 percent were African American, and 4.18 percent was an individual that classified themselves as one of the other minority races. Race information was not available for 11.57 percent of the total applicants. Of the 3,678 total applications made for home improvement loans in 2013, 1,556, or 42.31 percent, were denied based on a poor application score in one of the basic nine evaluation areas. As discussed in the general HMDA analysis section, this category of loan financing experienced the highest denial rate out of all four loan types.

Credit history (56.04 percent) and debt to income ratio (18.96 percent) account for the largest amount of denials. Out of the applicants denied a loan due to a perceived problem with their credit history, 72.02 percent were White, 15.48 percent were African American and 2.87 percent was one of the other racial minorities. Out of the applicants denied a loan for debt to income ratio, 65.42 were White, 15.59 percent were African American and 6.11 percent were one of the other racial minorities. In both cases, African Americans and other racial minorities experience a higher rate of denial than the proportion of applicants in the total applicant pool.

Applicants that classified themselves as Hispanic made up 14.81 percent of the total home loan applications denied. Out of the 3,678 applications filed, Hispanic or Latino applicants account for 1.09 percent of applicants. This also shows a disparity in the rate of loan denial.

When examining the data by income level, credit history is the number one reason for denial. For all incomes reporting, credit history accounts for the denial for at least 56.04 percent of the applicants. This includes those at the higher income brackets that are considered market rate buyers. The chart below shows the denial rate based on credit history for each income level.

Figure 9 and tables 26, 27 and 28 delineate the reasons for denial on the basis of race, ethnicity and income.



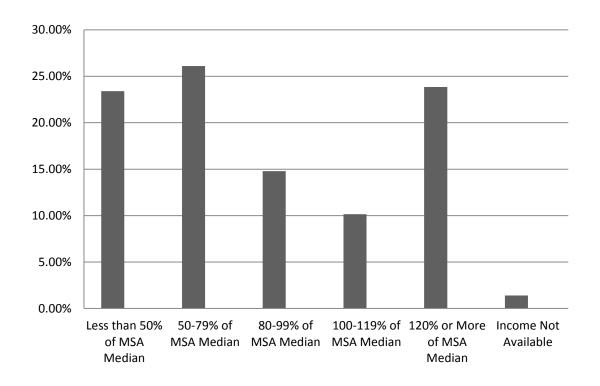


Figure 29 - Percent of Denials based on Credit History



Table 27 - Home Improvement Loan Denials by Race

	Debt to Income Ratio	Employment History	Credit History	Collateral	Insufficient Cash	Unverifiable Information	Credit Application Incomplete	Mortgage Insurance Denied	Other	Total
Race										
American Indian or Alaska Native	6	1	5	2	0	0	0	0	3	17
Asian	9	2	13	0	0	1	2	0	4	31
Black or African American	46	2	135	13	8	4	0	1	12	221
Native Hawaiian or Other Pacific Islander	0	1	2	0	0	0	0	0	0	3
White	193	14	628	123	23	11	17	0	81	1,090
Two or More Minority Races	1	0	0	1	0	0	0	0	0	2
Joint (White/Minority Race)	2	0	5	3	0	0	0	0	2	12
Race Not Available	38	3	84	18	5	4	1	0	27	180
Total	295	23	872	160	36	20	20	1	129	1,556



Table 28 - Home Improvement Loan Denials by Ethnicity

	Debt to Income Ratio	Employment History	Credit History	Collateral	Insufficient Cash	Unverifiable Information	Credit Application Incomplete	Mortgage Insurance Denied	Other	Total
Hispanic or Latino	4	0	17	1	1	0	0	0	1	24
Not Hispanic or Latino	262	20	767	139	31	16	17	1	111	1,364
Joint (Hispanic or Latino/Not Hispanic or Latino)	1	0	4	1	0	0	0	0	0	6
Ethnicity not available	28	3	84	19	4	4	3	0	17	162



Table 29- Home Improvement Loans Denied by Income

	Debt to Income Ratio	Employment History	Credit History	Collateral	Insufficient Cash	Unverifiable Information	Credit Application Incomplete	Mortgage Insurance Denied	Other	Total
Income										
Less Than 50% of MSA Median	104	10	200	16	1	11	0	0	22	364
50 – 79% of MSA Median	84	4	241	37	7	2	5	0	31	411
80 – 99% of MSA Median	35	2	140	21	8	0	3	1	20	230
100 – 1126.419% of MSA Median	23	0	91	20	7	2	2	0	13	158
120% or More of MSA	47	7	188	62	13	4	10	0	40	371
Income Not Available	2	0	12	4	0	1	0	0	3	22
Total	295	23	872	160	36	20	20	1	129	1,556



## **Housing Market**

When the last Analysis of Impediments to Fair Housing was published, the City of New Albany was beginning its efforts to use Neighborhood Stabilization Program (NSP) funds to help rehabilitate the housing market from the 2008 crash. The intent of the NSP program was to stabilize neighborhoods hit hard with foreclosures and housing abandonment. The City of New Albany and its private partners targeted funds in the Midtown neighborhood, buying, refurbishing or demolishing, vacant structures. Seventy percent of the new homes or newly refurbished homes were sold to first time homebuyers. Approximately \$7 million has been spent from 2009 until 2013. A total of 33 sites received investment, including two public facilities and 13 new homes.

This section will look at the housing market and how it has recovered since the beginning of the recession. This section will also look at public housing programs.

# **Public Housing**

The New Albany Housing Authority (NAHA) is the public housing agency serving the City of New Albany. The NAHA has evolved to become much more in the lives of it's residents than a provider of a roof and four walls. The NAHA provides opportunity for self-improvement and personal growth for young families, senior citizens and those eager to improve their career and life prospects.

### The NAHA offers:

- Affordable housing options
- General Education Development (GED) training programs
- Home Ownership Program for Residents
- Family Self-Sufficiency Program Assistance
- Computer Lab Access
- Access to more than 40 Community Service Providers who provide services in partnership with NAHA
- Transportation Programs for Senior Residents to deliver Seniors to medical appointments, grocery, etc.

The NAHA offers two affordable housing options for low and moderate-income households living within the City of New Albany, public housing units and the housing choice voucher program. NAHA has a total of 1,177 public housing units and 413 housing choice vouchers.

Funded by the U.S. Department of Housing and Urban Development (HUD), public housing communities are owned and operated by NAHA and Public Housing tenants rent directly from NAHA. Households apply directly to the NAHA and sign a lease with NAHA to rent the



apartments. NAHA maintains the property, as a normal landlord would be required. Below is a map of the properties respective to the African American population. Public housing is located primarily in areas of high concentrations of minority populations.

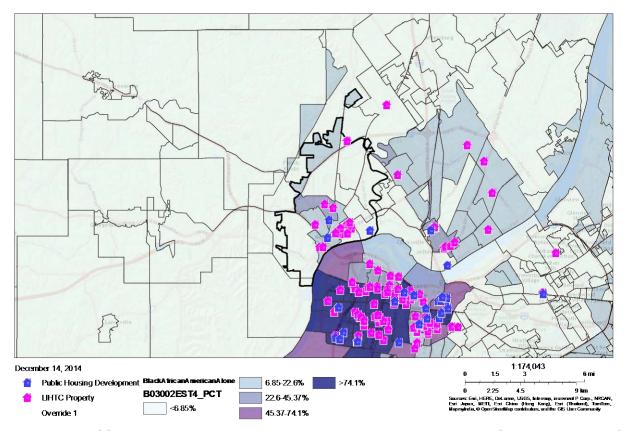


Figure 30 - Public Housing Communities, Low Income Housing Tax Credit Properties and Concentration of the African American Population – CPD Mapping Tool



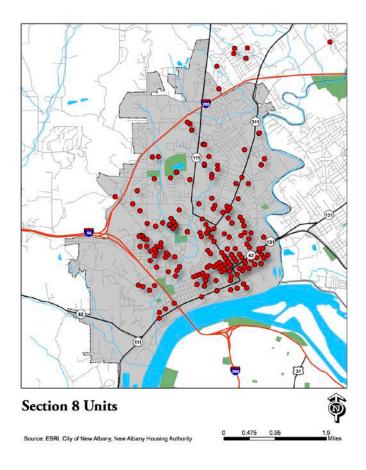


Figure 31 – Location of Housing Choice Vouchers in Use as of 11/20/14

The second program, the Housing Choice Voucher (HCV) Program provides housing assistance for qualified low-income families in the rental market. Voucher holders are able to select a unit from the private rental market. As long as their housing choice meets reasonable rent requirements determined by NAHA, program participants pay no more than 30% of their monthly-adjusted income toward rent and utilities. The housing assistance payment subsidizes the balance of the rent to the property owner. NAHA administers the federal HCV Program, more commonly known as Section 8, currently allowing 413 families to choose and lease safe, decent and affordable privately-owned housing in the City of New Albany.

Figure 31 indicates the location of use of Section 8 vouchers or housing choice vouchers.

The rental properties may be apartments, town homes, detached single-family homes, duplexes or mobile homes. Section 8 Program participants are issued vouchers guaranteeing the property owner that Section 8 will pay a certain portion of the tenant's rent. The amount



paid will differ from tenant to tenant depending on family size and income. The program participant and owner execute a lease, just as the property owner would do with any other renter who does not receive assistance. However, Section 8 also executes a contract with the owner specifying the amount Section 8 will pay toward the rent. Figure 32 shows both the location of public housing properties and the percentage of housing vouchers used by census tracts. Public housing and low-income housing tax credit properties are predominantly located in areas of poverty concentration.

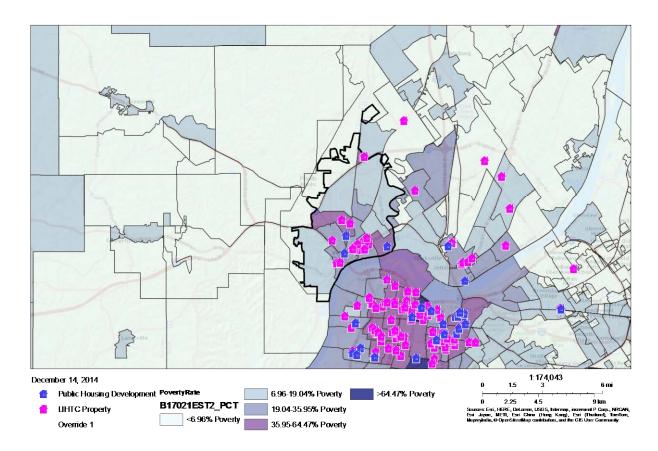


Figure 32 – Affordable Housing Opportunities and Poverty Concentration

The New Albany Housing Authority tracks race and disability of the households and families living in public housing communities as well as households and families receiving Section 8 assistance. The number of white households receive the most assistance from NAHA.

City Consultants and Research, LLC examined the total number of minorities living in housing communities and receiving Housing Choice Vouchers to determine if any race received a preference for public housing or the Housing Choice Voucher Program. Figure 34 shows the



number of beneficiaries by program. According to the numbers presented by the HUD eCon Planning suite, African Americans receive public housing at a same rate as their White peers.

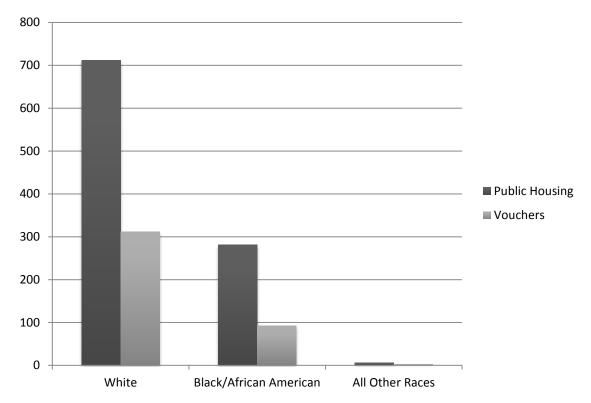


Figure 33 – Number of Beneficiaries of Public Housing and Housing Choice Vouchers by Race

The same thing is true for the Hispanic population. Only a small portion of persons identifying themselves as Hispanic benefit from Public Housing or Housing Choice Vouchers, just 2 percent and 0.7 percent respectively. Since the difference in percentages is not statistically significant, it does not appear as a preference is given to those of Hispanic ethnicity to choose public housing or housing choice vouchers.

Families with children and families living with a disability have greater housing choice through the Section 8 Voucher program. The families using Section 8 vouchers are able to choose a location that best suits their needs. Figure 37 shows the percentage by benefits for families with disabilities. Overwhelmingly, a greater percentage of those families who receive any benefit from the New Albany Housing Authority are served with housing choice vouchers.



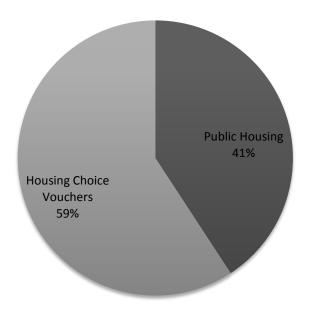


Figure 34 - Families with Disabilities by Public Housing Benefit

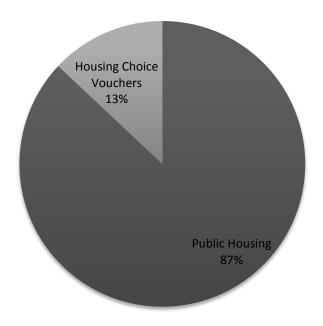


Figure 35 - Elderly Household by Public Housing Benefit



For Elderly Households, the majority of are in public housing units. Of the elderly households, 87 percent live in public housing and only 13 percent benefit from Housing Choice Vouchers.

When utilizing the CPD mapping system, City Consultants and Research, LLC found that many of the public housing and other affordable housing opportunities were located in floodways. However, upon further examination with mapping abilities able to zoom closer to the sites, the consultant agency found that CPD mapping system was in error. Public housing and other affordable housing opportunities, while near possible flood zones, are not located in flood zones. Figure 36 shows the correct map of the public housing and flood zones within the City of New Albany.

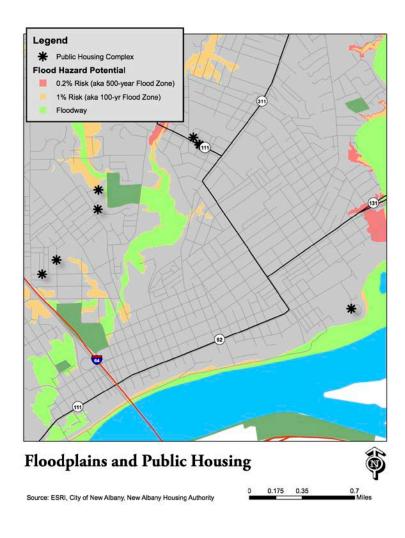


Figure 36 - Public Housing and Flood Plain Map



#### IV: Land Use Profile

This section of the *Analysis of Impediments to Fair Housing Choice* (AI) analyzes the land use for the City of New Albany and Floyd County and evaluates the public policies regarding land use and planning to determine the result in any impediments to fair housing choice.

The AI will analyze data from current and approved plans and policies. The City of New Albany is looking to update its Comprehensive Plan in 2015; however, proceeding will require a grant approval from the State of Indiana to finance the effort. An approval of the grant is expected in the Spring of 2015.

Zoning regulations and planning documents play a large role in the usage of property within New Albany. These regulatory requirements determine the type of building, commercial versus residential, and the density of the use. The city of New Albany can determine if any regulations hamper housing choice by evaluating the land use and determining if any regulation places undue hardship on any particular protected class.

#### **Zoning Regulations**

The City of New Albany's zoning regulations allow for a wide range of development types and the city's planning and zoning bodies have regularly supported variances or zone changes to help create affordable housing.

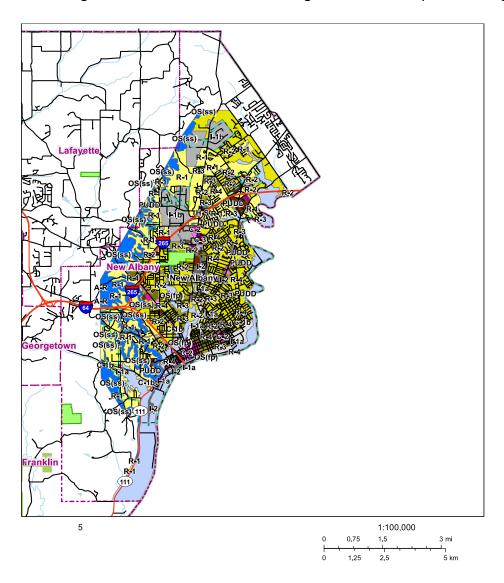
The Louisville Metro Human Relations Commission released a 20-year action plan for fair housing in June 2013. The report outlined concerns with Single Family R-4 zoning in Jefferson County, the county for Louisville, KY. R-4 zoning is a residential zoning, which permits building homes only on lots no smaller than 9,000 square feet, or nor more than 4.84 dwelling units per acre. According to the report, 69 percent of Jefferson County is zoned R-4.

In light of this report, City Consultants and Research, LLC reviewed the variety of zoning and land use across the City of New Albany. Figure 36 shows the variety of zoning across the City of New Albany and the fringe area that extends the Planning Commission oversight into Floyd County, outside the City limits. Overall, the zoning regulations appear appropriate.

The single-family detached zoning districts permit lots as small as 7,200 square feet and minimum ground floor areas of 750 square feet for two-story and split level homes. The multifamily zoning districts permit single-family lots as small as 5,000 square feet. The multi-family zoning districts permit densities up to 48 dwelling units per acre and minimum floor areas as small as 400 square feet plus 150 square feet per bedroom. Thus, the zoning districts permit smaller lots, smaller dwelling units and higher densities for single-family detached, single-family attached and multi-family attached dwellings for low and moderate income housing construction, and do not pose a barrier to the construction of low and moderate income housing. Moreover, the treatment of manufactured homes as single-family homes permits a



wider range of on-site versus off-site housing to ensure lower price housing.



**Figure 37 - Zoning Type in New Albany** 

#### Comprehensive Plan

The City of New Albany follows a non-binding land use plan to guide housing, commercial and industrial development called the Comprehensive Plan. The Comprehensive Plan, was last updated in 1999. The Comprehensive Plan is due to be updated in 2015, pending a funding approval from the State of Indiana.



At the time of the current plan's publication, the City of New Albany predicted a population growth to 46,625 people in 2010 and 53,328 people in 2020. With the current population still at approximately 36,000 people, the population growth did not happen in the eleven years as expected.

Copies of the Comprehensive Plan are available on the City of New Albany website, however much of the document is scanned and unreadable. For a current resident or citizen to find out more about the Comprehensive Plan, he or she must contact the City of New Albany Planning Department.

#### Planning and Recording Fees

The planning fees are typical and do not raise any concerns. Recording fees are reasonable and comparable to other cities of similar size.

#### New Albany Planning Commission and Board of Zoning Appeals

The New Albany City Plan Commission is an 11-member body representing the community in matters of Comprehensive Planning, Subdivision Control, Zoning, Annexation, Site Planning and Development, and other community development matters. The Mayor of New Albany appoints five members, the Floyd County Commissioners appoint two representatives from the Unincorporated Two-Mile Fringe Area. Other members include a seated member of the New Albany City Council, a member of the New Albany – Floyd County Parks and Recreation Board, an appointed member by the New Albany Board of Public Works and Safety, and the City Engineer.

The Plan Commission and its staff provide expertise in comprehensive planning, historic preservation, geographic information systems, economic development, annexation, housing, and transportation planning. Staff members routinely report to the Plan Commission and provide planning and zoning information to government officials, real estate professionals and the public. Plan Commission staff members also represent the city on regional planning boards.

The New Albany Board of Zoning Appeals is a five-member, quasi-judicial body responsible for authorizing Land Use Variances, Development Standards Variances, Special Exceptions, and Conditional Uses throughout the City and the Two Mile Fringe Area. The Board consists of five members, three appointed by the Mayor of the City of New Albany, one appointed by the New Albany City Council, and one member of the Plan Commission representing the Two Mile Fringe Area.

Planning staff offers help for homeowners, business owners and developers through the



appeals process. Frequently asked questions, forms and necessary contact information are available on the City of New Albany website.

#### Building, Occupancy and Health and Safety Codes

The City of New Albany building codes are set within The City of New Albany, Indiana Code of Ordinances, Title XV Land Usage – Chapter 150 Building Regulations. The building standards set within the municipal code include several articles of the Indiana Administrative Code, including Article 14: Indiana Residential Code (formally the Indiana one and two-family dwelling code). The Indiana Residential Code is based on the International Residential Code drafted by the International Code Council (ICC). The ICC strives to develop building codes that promote safety and respond to national standards such as the Americans with Disabilities Act, and utilize recommendations from national builder's associations and trade organizations.

The City of New Albany, Building Department conducts inspections on commercial and residential construction projects, as well as, locate and monitor un-safe and vacant structures for potential demolition and/or rehabilitation. The Building Department also issues permits and licenses to contractors and manage the city's code enforcement efforts, such as property maintenance and cleanliness of premises. The grass and weed control program is an added Division of Code Enforcement program that is managed through the Building Department.

#### **Public Transportation**

The federal government mandates regional efforts in transportation planning. Traffic patterns and types of transportation have an effect on an entire region, ignoring political boundaries. The Kentuckiana Regional Planning and Development Agency (KIPDA) is responsible for the development, implementation and promotion of comprehensive transportation systems of various alternatives for Louisville and Southern Indiana residents. The KIPDA has an 18-member board with representatives from five counties. Figure 37 is a map of the metropolitan planning area.



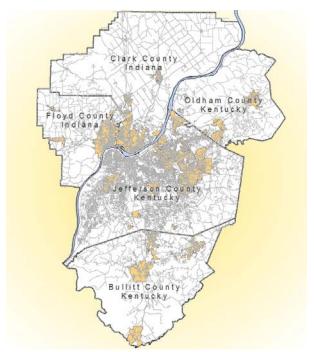


Figure 38 - Louisville Metropolitan Planning Area

Priorities for transportation planning include:

- Improve safety on roadways and interstates.
- Improve traffic flow on roadways and interstates during peak travel hours.
- Increase strategies that reduce the demand placed on roadways and interstates by single occupant vehicles.
- Improve air quality.
- In support of economic development, improve mobility with designated freight corridors.
- Improve mobility options through the implementation of alternate travel modes.

Through stakeholder input, some of the challenges in affordable housing development includes lack of public transportation and new tolls required for bridges across the Ohio River between Indiana and Kentucky. A federal Department of Highway Transportation report called *Income-Based Equity Impacts of Congestion Pricing* examined some of those similar concerns. Some of the issues the report examines:

- The need of employees with low-skilled jobs to have single occupant vehicles to get to work in off hours or areas where public transportation typically does not serve.
- Most toll systems are electronic and utilize systems that are not commonly used by low income households, such as credit, bank accounts, etc.



- Public polls show support for tolls amount low-income households over higher taxes to pay for roadways.
- Addressing equity issues of tolling by providing rebates or credits, or revenue transfer to transit and carpooling services in the priced corridor.

This study and another study by Washington State Department of Transportation called *The Impacts of Tolling on Low-Income Persons in Puget Sound Region* found that the more people relied on single occupancy vehicles, the greater the burden the tolling places on a person or household.



#### V: Compliance Data

This section will evaluate the current issues facing the city of New Albany that may affect fair housing choice. Items for this evaluation include current court cases, property taxes, current programs, reporting methods and educational programs. This section also provides a valuable self-assessment of the progress made to ensure fair housing choice and evaluate areas of improvement in current or previous programming.

#### **Current Cases**

The City of New Albany does not have any outstanding fair housing cases. The New Albany Housing Authority had two cases of housing discrimination to resolve in 2013 and 2014.

The first case involved a claimant who stated she was denied a reasonable accommodation for her disability. The Indiana Civil Rights Commission investigated the claim and issued a Notice of Finding, dated January 10, 2014 that a "reasonable cause does not exist to believe that an unlawful discriminatory practice occurred in this instance." The claimant was moved into a unit compliant with the Americans with Disabilities Act in early March 2014.

The second case involved a claimant who stated she was discriminated against on the basis of her gender and race. The Indiana Civil Rights Commission investigated the claim and issued a Notice of Finding, dated October 10, 2014 that "there is no reasonable cause to believe that an unlawful discriminatory practice occurred in this instance."

All staff with the New Albany Housing Authority receives annual training about fair housing or on issues of fair housing.

#### **Property Taxes**

In March 2008, the Indiana General Assembly passed bill SJR0001 to limit the amount of property taxes beginning in 2012 for the entire state of Indiana. The limit for homeownership properties will be one percent of the assessed value. The limit for rental properties will be two percent of the assessed value. The limit for commercial properties will be three percent of the assessed value.

The single tax rate does have potential problems. Higher taxes for rental properties may be passed along to the end consumer, or the lessee of the property, in the form of higher rents. This could have an adverse effect on lower income individuals renting properties with higher property taxes. While not all low-income individuals are minorities, those individuals in the protected classes tend to rent their housing more than own housing. An increase or decrease in property tax cost passed along to the renters could have an adverse affect on the protected classes.



#### Government Programs and Education

The Indiana Civil Rights Commission (ICRC) serves as the primary investigative and resolution agency for fair housing complaints for the State of Indiana. The ICRC is contracted by the U.S. Department of Housing and Urban Development (HUD) to investigate fair housing discrimination. The ICRC has substantial equivalence certification, meaning they enforce a fair housing law that provide substantive rights, procedures, remedies and judicial review provisions that are substantially equivalent to the Fair Housing Act. HUD may refer complaints of housing discrimination to the ICRC as the nearest federal fair housing office is located in Chicago, IL

Complaints may follow an eight-step process; however, most complaints are resolved within the first three steps. Figure 39 demonstrates the complaint and resolution process.



Figure 39 - Complaint Process for the Indiana Civil Rights Commission

A complaint must be filed within 180 days of the date of the occurrence of the discriminatory act. From that point the Indiana Civil Rights Commission (ICRC) conducts a thorough investigation from the point of view of both parties involved within the complaint. The investigator from the ICRC may require a test to be performed as part of the process. Testers



are trained individuals whose purpose is to observe what occurs and record their experience relating to the complaint. The test is a controlled method for determining the integrity of the information relating to the complaint. After an investigation, the two parties may submit to a mediation to resolve the problem. This is a voluntary process and if no agreement is reached, the complaint may follow the process above to the public hearing, final resolution and remedies.

According to the 2013 Indiana Civil Rights Commission Annual Report, the ICRC received 1,595 discrimination complaints or inquiries, not limited to housing. At the end of the 2013 fiscal year, the ICRC had no open cases or aged case relating to housing discrimination. As of September 14, 2014, the ICRC did not list any fiscal year 2014 probable cause findings for housing discrimination.

The ICRC also conducts public outreach programs and educational programs. During the 2013 fiscal year, the ICRC conducted 45 different events, workshops and programs across the state, reaching 3,584 people. It is important to note that these sessions were not limited to New Albany.

While the City of New Albany has a fair housing ordinance, it does not have a set method for receiving fair housing complaints. In July 2014, the fair housing officer stepped down from the duties of accepting calls and referring complaints to the Indiana Civil Rights Commission. At time of publication of this document, a replacement has not been found. Prior to losing the fair housing officer, the process involved referring complaints for investigation by the Indiana Civil Rights Commission.

The City of New Albany does not have a Substantially Equivalent Certification from the Office of Fair Housing with HUD.

#### Self Evaluation

The City of New Albany has included the previous goals of the *Analysis of Impediments to Fair Housing Choice* (AI) as part of its *2010-2014 Consolidated Plan* and congruent Action Plans. The City of New Albany has worked to provide funds towards affordable housing projects that address extremely low-income households, persons with disabilities and further fair housing. However, the City has found challenges when trying to invest funding in affordable housing projects.

Table 24 shows the progress made towards the impediments listed in the previous *Analysis of Impediments to Fair Housing*.



Table 30 - Evaluation of Progress Towards Impediments and Goals in 2010-2014 Analysis of Impediments to Fair Housing

Impediment/Obstacle	Resolution/Outcome
The City should continue its support of the completion of the Linden Meadows project.	The Linden Meadows project did not move forward.
The City should use the NSP to leverage additional affordable housing in the NSP target area.	An April 2013 report states NSP funding assisted 33 sites.
The City should engage in a regional fair housing testing program in association with the greater metropolitan area.	No testing has taken place in New Albany, Indiana.
The City should update is Fair Housing page in the website and provide information about Fair Housing, what constitutes a violation and how people should report a violation.	The Analysis of Impediments to Fair Housing from 2010 is on the City website.

Overall, the progress the City of New Albany the goals in the previous AI have not been positive. Some of the challenges found in New Albany include the development of affordable housing, regardless of where the development takes place within the City of New Albany. In 2012, the City Council voted not to support two applications to the Indiana Housing and Community Development Authority for Low Income Housing Tax Credits. The two projects accounted for 178 units of affordable housing. Neither project – the Legacy Project nor Summit Springs – received an endorsement to receive funding from state and private resources.

However, the City of New Albany has made progress towards helping furthering fair housing that were not part of the previous AI, including:

- Infrastructure improvements to areas with greater concentrations of poverty and people with disabilities. Improvements include compliance with the Americans with Disabilities Act.
- Funding a down payment assistance program to increase affordability for new homebuyers.
- Funding an Emergency Repair and Repair Affair Program to help current homeowners unable to afford major repairs.

Stakeholder interviews, as indicated in the next section of this document, indicate a common obstacle to the development of affordable housing is the perception of affordable housing and public housing as undesirable.



#### VI: Mail Survey and Community Input

#### 2014 Survey

The City of New Albany utilized an electronic survey to solicit input from the general public. A total of 84 surveys were completed. The findings from the survey were:

- The greatest housing needs include repair assistance for homeowners and rehabilitation of foreclosed homes for homeownership opportunities.
- 8.64 percent of the respondents have experienced housing discrimination. Of those, one third stated the discrimination on the basis of race.
- Only 22 percent of respondents know where to report discrimination. Of those who stated they know where to report fair housing complaints, 80 percent said they would report the discrimination to HUD.
- Less than 20 percent of respondents have ever attended an educational workshop or class on fair housing topics.
- The largest barrier to affordable housing is landlords refusing to provide reasonable accommodations.

#### Professional/Stakeholder Interviews

City Consultants and Research, LLC conducted face-to-face interviews and telephone interviews with various stakeholders and professionals in the New Albany community. Stakeholders also represented Southern Indiana and the Louisville Metropolitan Area. A complete list of the people interviewed for this document is included in Appendix A. A number of the people interviewed provided additional resources to collect information and data regarding fair housing choice. This data assisted with the analysis of fair housing choice.

In addition, the interviews confirmed the analysis of the data and suggested other obstacles to fair housing choice and housing development not readily available in other data or statistics. Some of the comments and concerns are listed below. Please note, the following statements are those of stakeholders in the community, not those of the City of New Albany staff or City Consultants & Research, LLC., and may not necessarily be fact based.

#### Affordable Housing Development

- Housing discrimination complaints are often confused with tenant/landlord miscommunication that has escalated to eviction process that can prevent resolution of problems that may or may not be discriminatory practices.
- Tighter regulatory requirements tied to funding sources have made it difficult to develop affordable homeownership opportunities as the housing market still lags in some neighborhoods.



- The perception of affordable housing development is negative by "interviewees" and community residents, creating a "myth" about affordable housing and its negative affects in the community.
- Landlords may not know all the rules and regulations surrounding fair housing choice, such as allowing seeing-eye dogs in a "no pets" facility.
- Concern for utility costs as a barrier for affordable housing is increasing.
- The City of New Albany used to have down payment housing programs and other programs that increased homeownership that are no longer offered that could be a benefit to low income homebuyers now.
- The Louisville HUD office is closest to New Albany residents for issues about housing, but cannot service that community. New Albany residents must to go Indianapolis, 2 hours away for HUD assistance.
- People with disabilities seem to be the most victimized group, not race, when it comes to fair housing.
- Some discrimination based on religion or ethnicity, specifically middle-eastern or Islamic households, has increased.
- New Albany has vacant housing stock in downtown that would be readily available for affordable housing development.
- It has been proposed that the City of New Albany had a higher amount of public housing than other communities its size but interviews with the public housing agency state this is an incorrect perception.
- The local housing agency has had clean audits for the past fourteen years.

#### Other Community Development Needs

- Community stakeholders may not know all of the services providers available to low income households in Southern Indiana as some service providers are very small. A full accounting of the services for the homeless is not available.
- Public meetings about transportation do not seem to be located in places easily reached by users of public transportation.
- There is much concern about the new bridge across the river, how it will change the location of jobs and the affect tolls will have on low income households
- Public transportation is essential for many low-income residents and only a few transportation lines come from Louisville and into Indiana.
- Urban jobs are not living wage jobs. Living wage jobs need to increase.



#### **Regulatory Requirements**

- The river provides a geographic border for many service providers, even though both Louisville and New Albany are a part of the same metropolitan statistical area.
- Stakeholders had a familiarity with either Kentucky regulations or Indiana regulations, but rarely both.
- Public perceptions about affects of the new toll bridge on low-income households are negative and there is great concern that will be a determent to the many residents commuting to and from work.
- Some City staff is unaware of the process for accepting housing discrimination calls and is unaware if the City continues to receive the calls.
- Limited fiscal means prevents the City from providing many programs and supporting some affordable housing projects.
- The regulations associated with the Indiana Hardest Hit Funds are seen as too restrictive and are not sought after by local agencies.
- The State of Indiana is tightening restrictions on the development landlord registries, making it more challenging for local governments to monitor absentee landlords.

City Consultants and Research, LLC conducted a presentation and input session with local stakeholders from the Southern Indiana Housing Initiative. In the meeting, the attendees participated in a carousel exercise, asking small groups of three or four people to answer a variety of questions about housing and community development needs. There were a total of ten questions and each group was given two to three minutes to brainstorm answers. The response was positive and gave the City of New Albany a broad sweeping picture of the entire county. Results are listed in Appendix B.



#### VII: Fair Housing Impediments, Recommendations and Action Plan

The City of New Albany does not have any regulatory impediments to fair housing choice. Impediments to Fair Housing in the City of New Albany are more subtle. The city has a number of positive aspects regarding fair housing choice.

- The City of New Albany does have a City Planner knowledgeable about fair housing who will continue to guide local plans in a manner that furthers fair housing.
- The New Albany Housing Authority offers training for all staff members annually on the topics of fair housing.
- Indiana Civil Rights Commission provide regular training programs and serve as advocates for fair housing choice.
- The current Comprehensive Plan is sixteen years old and does not address the current needs of housing market as it has changed greatly in that long of a period. However, this is not untypical for smaller communities to have aging plans such as the Comprehensive Plan.

Despite the progress made, some obstacles or impediments to fair housing still exist. The following chart outlines a variety of areas in need of improvement. Impediments and items that may be achievable within the next five years given the current financial resources have been selected. The City of New Albany will utilize five years, 2015-2019, to address the impediments listed in the chart.



Impediment/Challenge	Resolution/Outcome	Date to be Accomplished
Discrimination found in New Albany is not blatant enough for a victim to recognize it other than through paired testing.	Provide education to all landlords and property mangers on the types of actions that are considered discrimination.	Fund bi-annual education seminars
Discrimination found in New Albany is not blatant enough for a victim to recognize it other than through paired testing.	Engage in a regional fair housing testing program in association with the greater metropolitan area.	Participate in three testing programs over five years.
The City of New Albany does not have a fair housing officer or process for taking fair housing complaints.	Develop a formal method for accepting fair housing complaints and designate a fair housing officer.	Fiscal year 2015
The City of New Albany is not a Substantially Equivalent Organization that prevents possible funding resources.	Seek the Substantially Equivalent Certification from the Office of Fair Housing at HUD.	Fiscal year 2019
The City of New Albany, among its departments, has not had the human capital able to affirmatively further fair housing in a meaningful way.	Seek additional funding for fair housing programs and increase the capacity of staff to affirmatively further fair housing.	Seek and apply for a resource by 2017.
The City of New Albany has not developed a fair housing website as suggested in its previous Analysis of Impediments to Fair Housing.	Create a fair housing website that connects to the City's main page, with contact information and educational materials.	Fiscal year 2016
The City of New Albany has found that many of the complaints are filed because of tenant/landlord tensions and miscommunications, typically involving small landlords	Support legal organizations that can assist with landlord/tenant relations.	Partner annually from 2017-2019

The City of New Albany will use partnerships with State Government, local non-profit housing providers, local public service providers or community development advocacy groups to go beyond the steps listed in this plan to promote fair housing. The City of New Albany will support other initiatives by the State of Indiana and Louisville, KY, both jurisdictions with their own *Analysis of Impediments to Fair Housing*, to promote fair housing. Such initiatives may



include education programs related to fair housing, homeownership training or landlord/tenant legal services. Such additional efforts may be listed in annual reports but the above initiatives and resolutions will be completed by the City of New Albany over the next five years, 2015-2019.



### **City of New Albany**

## 2014 Redevelopment Survey

Each year the City of New Albany is charged with the implementation of approximately \$600,000 in federal housing and community development grants. To help plan and prioritize programming for future development in New Albany, the Department of Redevelopment is soliciting input from the community. Please note, questions are specifically asked in subject areas related to the source of the grants, the U.S. Department of Housing and Urban Development.

Housing Needs: rate the following housing needs of your community.	ı		
Need	Low	Medium	High
Repair Assistance to Homeowners			
Creation of New Housing			
Rehabilitation of Foreclosed or Vacant Housing			
Demolition of Foreclosed or Vacant Housing			
Creation of safe and decent rental housing (3 or 4 bedrooms)			
Creation of housing with at least 4 bedrooms			
Creation of housing with services – seniors/disabled			
Rent Assistance to Low Income Tenants			
Creation of Emergency Shelters for families (short-term stays)			
Creation of Transitional Housing (for stays less than 2 yrs)			
Is there another housing need that should be addressed but is not preventioned?	viously		
Fair Housing Act (A law enacted as part of civil rights legislation that publication of home sales, rentals and financing based on race, coloreligion, sex, familial status or those with disabilities.):			
Have you or anyone you know experienced discrimination in obtaining  Yes:   No:	housin	g?	

If so, what was the basis of the discrimination?			
Age: 🗌 Race: 🔲 Disability: 🔲 Religion: 🔲 Familial Status	s: 🔲 🤫	Sex: 🗌	
National Origin:			
3 —			
Do you know where to report housing discrimination?			
Yes: ☐ No: ☐			
If yes, where?			
<b>,</b> ,			
Have you ever attended a seminar or class on fair housing?			
Yes: ☐ No: ☐			
Rate the following barriers to obtaining housing.			
	No	Small	Large
Need	Barrier	Barrier	Barrier
Builder, Landlord or Lender discriminated in rental or sale			
Lender or Realtor directed clients to certain neighborhoods			
Landlord discriminated in the treatment of tenants			
Lender discriminated by denying a mortgage			
Lender discriminated by only providing sub-prime mortgage products			
Landlord refused to provide reasonable accommodations			
High foreclosure rates changing ability of current owners to keep homes			
High energy costs preventing would-be buyers from entering market.			
Other:			

# **Community Development and Social Services:** rate the following needs of your community.

Need		Low Me	dium	High
Repair/replace curbs/sidewalks				
Street or sewer repair/upgrades				
Park upgrades				
Brownfields cleanup				
Business incubation				
Job creation				
Community Center upgrades/rehabilitation				
Other:				
Rate the following social service needs of your community.				
Need	Low	Medium	High	
Youth programs				
Senior Citizen programs				
Parks and Recreation programs				
Programs for people with HIV/AIDS				
Green programs/Environmental Awareness				
Public Transportation				
Legal Services				
Child Care				
Other:				

Is there another need that should be addressed but is not previously mentioned?

#### **Consultations**

The people listed below provided in-person or phone consultations regarding fair housing and barriers to affordable housing in Indianapolis.

Name	Organization
Mayor Jeff Gahan	City of New Albany
Cyndi Krauss	City of New Albany, Redevelopment Department
Robin King	City of New Albany, Redevelopment Department
David Duggins	City of New Albany, Redevelopment Department
John Rosenbarger	City of New Albany, Redevelopment Department
Stacey M. Deck, PhD, MSSW	Spalding University
Bob Lane	New Albany Housing Authority
Karen Goodwell	New Albany Housing Authority
Krisjans Streips	City of New Albany, Planning Department
Scott Wood	City of New Albany, Planning Department
Andrea Stevens	Habitat for Humanity, New Albany Affiliate
Cathy Hinko	Metropolitan Housing Coalition
Christie McCravy	Louisville Urban League
Brian Brown	Salvation Army – Transitional Housing Director
Casey Smith	Lifespring Health Systems
Leslea Townsend Cronin	St. Elizabeth's Catholic Charities
Lisa Donahue	New Albany Housing Authority
Rebecca Jetton	Center for Women and Families
Paula Craig	Blue River Services
Shelly McDonald	Center for Women and Families
Sarah Alstott	Blue River Services
Christine Harbison	Hope Southern Indiana
Sarah Stephens	Clark County Health Department
Sheryl Dant	Hoosier Hills PACT
Jessica Floyd	Lifespring Health Systems
Amy Moore	Homeless Population Representative

## Southern Indiana Housing Initiative Meeting Carrousel Exercise December 11, 2014

Participants broke up in groups of 3-5 people. The groups moved around the room discussing questions about needs in the community. There were a total of 9 questions. Each group was provided 2-3 minutes to discuss and answer each question. Results are below:

Question 1: What needs are being met in neighboring communities that are not met in New Albany?

- Emergency shelter (2)
- Clinic health services
- Centralized intake/point of entry
- A true coalition such as the Coalition for Homelessness in Louisville
- School and McKinney Vinto Collaboration
- Day shelters
- Public transportation
- Direct services to homeless
- Transitional housing

Question #2: Did the harsh winter of 2014 bring attention to any needs in the community?

- Navigation for service personnel very difficult
- Advertised warming stations
- Made needs more noticeable more homeless were visible
- More heating assistance was needed especially propane
- Salt shortage
- Public transportation and lack of covered bus shelters
- Need for utility assistance
- Need for clothing assistance
- Need more emergency shelters

Question #3: Who is having challenges finding housing?

- The working poor those who are on the verge of qualifying for benefits such as single female head of households
- Domestic violence victims/sexual assault survivors
- Those with substance abuse issues/recovering
- Felons
- People with ruined credit
- Precariously housed
- People aging out of foster care
- Uneducated adults, with no GED or undereducated

Question #4: In what ways can the City of New Albany educate the community about fair housing that would beneficial?

- Agencies should educate officials
- Host public educational forums to teach people their rights
- Get "major players" engaged
- Engage landlords and property managers
- Educate developers
- Educate people that anyone, under the right circumstances, can become homeless

Question #5: What challenges do households in New Albany face on a daily basis?

- Not enough resources to meet daily needs, such as gas, food, rent, utilities and transportation.
- Childcare
- Transportation
- Employment, specifically with a living wage
- No financial education, susceptible to predatory lending
- Lack of substance abuse treatment and mental health treatment that are <u>affordable</u>.
- Parenting support
- Not enough connections to community support
- Domestic violence, sexual assault and child maltreatment

Question #6: What does homelessness "look like" in New Albany? In your community?

- Looks like your or me, more hidden and less transient
- Precariously housed
- In domestic violence shelters
- Youth aging out of foster care
- Single parent families, but some dual parent families
- Couch hopping/multiple families in one place/overcrowding
- Senior adults on fixed incomes
- Veterans
- Persons with developmental disabilities who do not qualify for benefits
- More employed/working families than ever before
- Substance abuse problems
- Poorly maintained housing/ "slum lords"

Question #7: What services do the disabled neighbors in your community request the most?

- Transportation
- Medication/affordable health care
- Housing repairs
- In-home health support
- Assistance to acquiring benefits
- Employment opportunities

Question #7: What services do the disabled neighbors in your community request the most? (Cont.)

- Accessible housing
- Budgeting skills/financial training
- Life skills/supportive services
- Adult protective services for seniors
- Services for those who "fall thru the cracks"
- Day services

Question #8: What are some of the complaints heard most about housing discrimination?

- Targeted population connected to money
- Felony convictions
- Immigrant status
- Poor housing/credit history
- Utility debt/landlord debt
- Medical debt
- Student debt
- Domestic Violence victims get evicted when the perpetrator is the cause of the trouble
- Lack of diversity

Question #9: How do you see housing characteristics changing to meet the needs of the growing senior population?

- Aging in place housing
- Affordable rents for fixed income
- Supportive services on site or close by
- Transportation
- Accessible to community resources and amenities
- Sustainability/energy efficiency for long term affordability
- Safety and security
- Rehabilitation/recycle to revitalize existing housing
- Grandparents raising grandchildren in the need of accessible homes and family friendly