

2010 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

NON-ENTITLEMENT AREAS OF LOUISIANA

FINAL REPORT

APRIL 28, 2010



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The Louisiana Office of Community Development

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HAS YOUR RIGHT TO FAIR HOUSING BEEN VIOLATED?

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

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

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ACRONYMS

ACS	American Community Survey
AEI	Administrative Enforcement Initiative
AI	Analysis of Impediments
BEA	Bureau of Economic Analysis
BLS	Bureau of Labor Statistics
CDBG	Community Development Block Grant
EOI	Education and Outreach Initiative
ESG	Emergency Shelter Grant
FHAC	Greater New Orleans Fair Housing Action Center
FHAP	Fair Housing Assistance Program
FHEO	Office of Fair Housing and Equal Opportunity
FHIP	Fair Housing Initiative Program
FHOI	Fair Housing Organization Initiative
FHWG	Fair Housing Working Group
HAL	High Annual Percentage Rate Loan
HMDA	Home Mortgage Disclosure Act
HOEPA	Home Owner Equity Protection Act
HOME	HOME Investment Partnerships Program
HOPWA	Housing Opportunities for Persons with AIDS
HUD	United States Department of Housing and Urban Development
NIMBY	Not In My Backyard
LDOJ	Louisiana Department of Justice
PEI	Private Enforcement Initiative

EXECUTIVE SUMMARY

BACKGROUND

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

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

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

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

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

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

COMMUNITY PROFILE

Demographics

The population in the non-entitlement areas of the state increased slightly from 2000 to 2007 by 5.7 percent, resulting in a net increase of 145,689 inhabitants. Intercensal estimates show moderate growth rates for older age cohorts between 2005 and 2007. Younger age cohorts also experienced growth, with only the age cohort of 35 to 54 experiencing a decline, falling by 1.5 percent.

In 2000, blacks comprised the largest minority group with 629,676 people or 24.8 percent of the population. There were many concentrated areas of black population throughout the non-entitlement areas of the state, with some census tracts showing over 78.1 percent black population in 2000. The black population experienced moderate growth from 2005 to 2007, but Asian, Native Hawaiian/Pacific Islander, and Hispanic populations expanded much more rapidly, while whites experienced a slight decline of 0.8 percent.

The balance of the state's population had a disability rate of 21.7 percent in 2000, and people with disabilities were concentrated in the central area of the state.

Economics

The labor force, defined as people working or looking for work, rose from 880,297 to 1,083,008 from 1990 to 2008, a rise of 23.0 percent. Unemployment fell by 2,367 during the same time period, resulting in the unemployment rate changing from 6.7 percent in 1990 to 5.2 percent in 2008.

In terms of earnings and income, average real earnings per job increased by \$4,091 from 2000 through 2007, from \$33,878 to \$37,969. Another measure, per capita income, also increased over the same time period from \$55,870 in 2000 to \$63,007 in 2007. The poverty rate was 18.6 percent in 2000 with 169,856 inhabitants under the age of 18 experiencing poverty. The poverty rate dropped slightly from 20.0 percent in 2005 to 19.4 percent in 2007, and the poverty rate was not even throughout the state, with many areas exhibiting disproportionately high concentrations of people in poverty.

Housing

Of the housing stock in the balance of the state in 2000, 721,737 units were single-family units, 23,419 units were duplexes, 27,027 units were tri- or four-plexes, 40,180 unit were apartments, 213,419 units were mobile homes, and 4,565 units were boats, RVs, or vans. Of those total units, 697,989 were owner-occupied and 216,186 were renter-occupied, for a home ownership rate of 76.4 percent. More than 116,172 units were vacant, and, of those, 23,003 were for rent and 14,589 were for sale. Between 2005 and 2007 there was a decrease in single-family and duplex units while the number of apartments and multiplexes increased. The number of renter-occupied units increased along with the number of vacant housing units.

The balance of the state had a small number of households, 30,561, experiencing overcrowding in 2000, and those experiencing severe overcrowding were even fewer at 12,662 or 1.4 percent of all households. Renters tended to have overcrowded and severely overcrowded households more often than homeowners. In 2000, a combined 31.9 percent of renters had a cost burden or a severe cost burden as opposed to 23.2 percent of homeowners with mortgages with cost burdens or severe cost burdens. From 2005 to 2007, the percentage of owners with mortgages with a cost burden increased from 26.5 percent to 27.4 percent, while the number of renters with a cost burden remained relatively unchanged, rising from 37.3 percent to 37.4 percent.

LENDING PRACTICES

Lending Activity

Several federal laws affect lending practices, such as the Fair Housing Act, the Equal Credit Opportunity Act, the Community Reinvestment Act and the Home Mortgage Disclosure Act (HMDA). HMDA data are the most inclusive lending data available and were used to analyze lending practices in the balance of the state. HMDA data for the balance of the state from 2002 to 2007 showed 1,086,076 loan applications were processed for home purchases, home improvements and refinancing, with 372,025 loan applications for owner-occupied home purchases.

Denial Rates

In regard to the 372,025 owner-occupied home purchase applications, excluding loan applications that were withdrawn by the applicant, incomplete or accepted by the prospective lender but not exercised by the applicant, there were 169,199 loan originations and 71,901 loan denials for an average loan denial rate of 29.8 percent. The most common reasons for denial of an owner-occupied loan applicant were credit history and debt-to-income ratio. Denial rates were not even; whites had a denial rate of 24.8 percent, while blacks and Hispanics had higher denial rates of 46.1 and 32.0 percent, respectively.

Higher rates of denial for racial and ethnic minorities, regardless of income, were also measured. Blacks experienced much higher loan denial rates than whites at all income levels. White applicants with incomes below \$15,000 were denied 60.0 percent of the time, while black applicants in the same income range were denied 75.2 percent of the time. This was also true for applicants with incomes above \$75,000, wherein whites had a denial rate of 12.3 percent and blacks had a denial rate of 25.4 percent. These higher denial rates were also observed in specific areas of the state.

High Annual Percentage Rate Loans

HMDA data report loan originations with unusually high annual percentage rate loans, or HALs, which are loans that may be considered predatory in nature. While whites had 25.2 percent of owner-occupied loans as HALs, blacks had more than double this rate at 45.7 percent. Hispanics had a moderate rate of HALs at 28.0 percent. These minority groups tended to carry a disproportionately higher share of foreclosure risk due to such high numbers of home purchase HALs.

FAIR HOUSING PROFILE

Fair Housing Studies and Cases

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

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

Fair Housing Complaint Data

Fair housing complaint data collected from the U.S. Department of Housing and Urban Development and the Louisiana Department of Justice showed that 399 fair housing complaints were filed in non-entitlement areas of the state in the last nine to ten years. Most complaints were filed on the bases of race or disability and were either found to have no cause or were settled successfully.

Fair Housing Survey Data

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

IDENTIFIED IMPEDIMENTS TO FAIR HOUSING CHOICE

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

Statewide Impediments to Fair Housing Choice

Three Categories:

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

A. Insufficient Fair Housing System Capacity

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

B. Ineffective Communication and Coordination

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

C. Lack of Understanding of Fair Housing

- 6. Lack of sufficient fair housing outreach and education resulting in:
 - a. Lack of understanding of fair housing issues and knowledge of fair housing laws,
 - b. Confusion about the differences between fair housing, housing production planning, and landlord/tenant issues,
 - c. Insufficient interest in fair housing activities in some communities,
 - d. Lack of desire to affirmatively further fair housing, and
 - e. Some local government actions may not be in the spirit of affirmatively furthering fair housing.
- 7. Lack of sufficient financial literacy resulting in:

- a. Disproportionately high denial rates for racial and ethnic minorities,
 - b. Denial rates disproportionately high in lower-income areas, and
 - c. Originated high annual percentage rate loans targeted to minority areas.
8. Discrimination in rental markets.
 9. Failure to make reasonable accommodation, particularly in rental markets.

Suggested Statewide Actions to Consider

Three Goals:

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

A. Improve Fair Housing System Capacity

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

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

B. Increase Communication and Coordination

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

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

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

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

Suggested Two-Year Fair Housing Action Plan

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

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

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

Impediments to Fair Housing Choice for Non-Entitlement Areas in Louisiana

1. Insufficient fair housing system capacity to respond to questions or concerns or to address fair housing needs as well as administer fair housing activities.
2. Lack of sufficient fair housing outreach and education resulting in:
 - a. Lack of understanding of fair housing issues and knowledge of fair housing laws,
 - b. Confusion about the differences between fair housing, housing production planning, and landlord/tenant issues.
3. Lack of sufficient financial literacy resulting in:
 - a. Disproportionately high denial rates for racial and ethnic minorities,
 - b. Denial rates disproportionately high in lower-income areas, and
 - c. Originated high annual percentage rate loans targeted to minority areas.

4. Discrimination in rental markets, including failure to make reasonable accommodation.
5. Implementation of local land use codes and/or zoning regulations, or the use of construction moratoriums and householder ordinances that may not be in the spirit of affirmatively furthering fair housing.

Suggested Office of Community Development Actions to Consider

1. Implement all the actions stated in Statewide Actions to Consider.
2. Participate in the proposed Louisiana Fair Housing Working Group.
 - a. Direct staff to take responsibility for operation of the FHWG.
 - b. Organize and conduct public relations for the FHWG.
3. Increase fair housing outreach and education to residents of the state's non-entitlement areas.
 - a. Establish liaison responsibility with the Louisiana Department of Justice (LDOJ),
 - b. Coordinate outreach and educational efforts with the LDOJ.
4. Enhance homebuyer education activities, increasing financial literacy.
5. Monitor current and upcoming housing projects to be certain that they are in compliance with the Americans with Disabilities Act and fair housing law for the disabled.
6. Enhance educational opportunities for existing landlords in the non-entitlement areas of the state.
7. Review inclusiveness of housing development activities, including efforts to eliminate segregation of racial and ethnic minorities.
 - a. Assist the Statewide FHWG with research on identification of best practices,
 - b. Assist the Statewide FHWG to make specific recommendations for zoning and land use regulations, including a review of householder ordinances.

SECTION I. INTRODUCTION

BACKGROUND

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

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

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

WHY ASSESS FAIR HOUSING?

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

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

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

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

HUD interprets these three certifying elements to mean:

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

PURPOSE

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

LEAD AGENCY

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

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

Table 1.1 Entitlement Areas in Louisiana
City of Alexandria
City of Baton Rouge
City of Bossier City
City of Houma/Terrebonne Parish
City of Kenner
City and Parish of Lafayette
City of Lake Charles
City of Monroe
City of New Orleans
City of Shreveport
City of Slidell
St. Tammany Parish
City of Thibodaux
Jefferson Parish
Balance of State

RESEARCH METHODOLOGY

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

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

¹ *Fair Housing Planning Guide*. U.S. Department of Housing and Urban Development. March 1996, pg.1-3.

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

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

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

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

Home Mortgage Disclosure Act Data

The Home Mortgage Disclosure Act (HMDA) was enacted by Congress in 1975 and has since been amended several times. It is intended to provide the public with loan data that can be used to determine whether financial institutions are serving the housing credit needs of their communities and to assist in identifying possible discriminatory lending patterns. HMDA requires lenders to publicly disclose the race, ethnicity and sex of the mortgage applicant, along with loan application amounts, household income and the census tract in which the home is located, along with information concerning their actions related to the loan application. For this analysis, HMDA data from 2002 through 2007 were analyzed, with denial rates by race and ethnicity of applicants as one of the key research objectives. Originated loans were further evaluated, with a subset of those loans identified as having characteristics of unusually high interest rates.

Fair Housing Complaint Data

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

2009 Fair Housing Survey

One of the methods HUD recommends for gathering public input about perceived impediments to fair housing is a survey of stakeholders. As such, a survey was utilized to gain feedback from fair housing stakeholders. The purpose of the survey was to gain a more qualitative analysis of the knowledge, experiences, opinions and feelings of

stakeholders regarding fair housing, as well as to gauge the stakeholders' understanding of affirmatively furthering fair housing. There were 451 surveys completed statewide.

PUBLIC INVOLVEMENT

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

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

COMMITMENT TO FAIR HOUSING

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

³ A copy of that flyer has been included in Appendix D of this document.

SECTION II. COMMUNITY PROFILE

INTRODUCTION

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

DEMOGRAPHICS

POPULATION

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

As seen in Table 2.1, the population of the non-entitlement areas in Louisiana increased by 5.7 percent from 2000 to 2007, from 2,538,074 persons to 2,683,763.

Table 2.2 presents the 2000 census population distribution by age. As of 2000, the balance of the state's population was comprised mostly of people younger than 19 or older than 35. There were only 501,990 persons aged 20 to 34 living in the balance of the state as opposed to 735,725 persons aged from 35 to 54.

The U.S. Census Bureau also conducts a nationwide survey, called the American Community Survey (ACS), which provides additional information on characteristics of the population. This data source was used to identify changes in population between 2005 and 2007, which may be attributable to occurrences such as Hurricanes Katrina and Rita. As seen in Table 2.4, ACS data show that most age groups experienced an increase in population after the storms, but the largest gains in population were for the 25 to 34 and 55 and over age groups.⁴

Entitlements	Population
2000 Census	2,538,074
2001	2,543,010
2002	2,554,436
2003	2,566,986
2004	2,582,479
2005	2,598,079
2006	2,598,174
2007	2,683,763
% Change 00 - 07	5.7%

Age	Population
Under 5	182,741
5 to 19	607,769
20 to 24	170,518
25 to 34	331,472
35 to 54	735,725
55 to 64	222,093
64 and Over	287,756
Total	2,538,074

⁴ The American Community Survey counts population residing in housing units. It overlooks persons residing in institutional and non-institutional group setting as well as the homeless. These data are only available by parish and for the state in its entirety.

Table 2.3			
Population by Age			
Balance of State			
2005 & 2007 American Community Survey Data			
Age	2005	2007	% Change
Under 5	132,735	135,592	2.2%
5 to 19	414,566	415,398	0.2%
20 to 24	134,231	138,577	3.2%
25 to 34	236,792	254,323	7.4%
35 to 54	538,539	530,706	-1.5%
55 to 64	195,560	201,654	3.1%
64 and Over	216,594	233,655	7.9%
Total	1,869,017	1,909,905	2.2%

RACIAL COMPOSITION

Table 2.5 shows the breakdown of the 2000 census population data by race for the balance of the state. The largest racial group was whites with 1,841,279 persons counted in the balance of the state, followed by blacks, with 629,676 persons counted. Hispanics and two or more races were the next largest minority groups but were much smaller at 43,455 and 23,627 people, respectively.

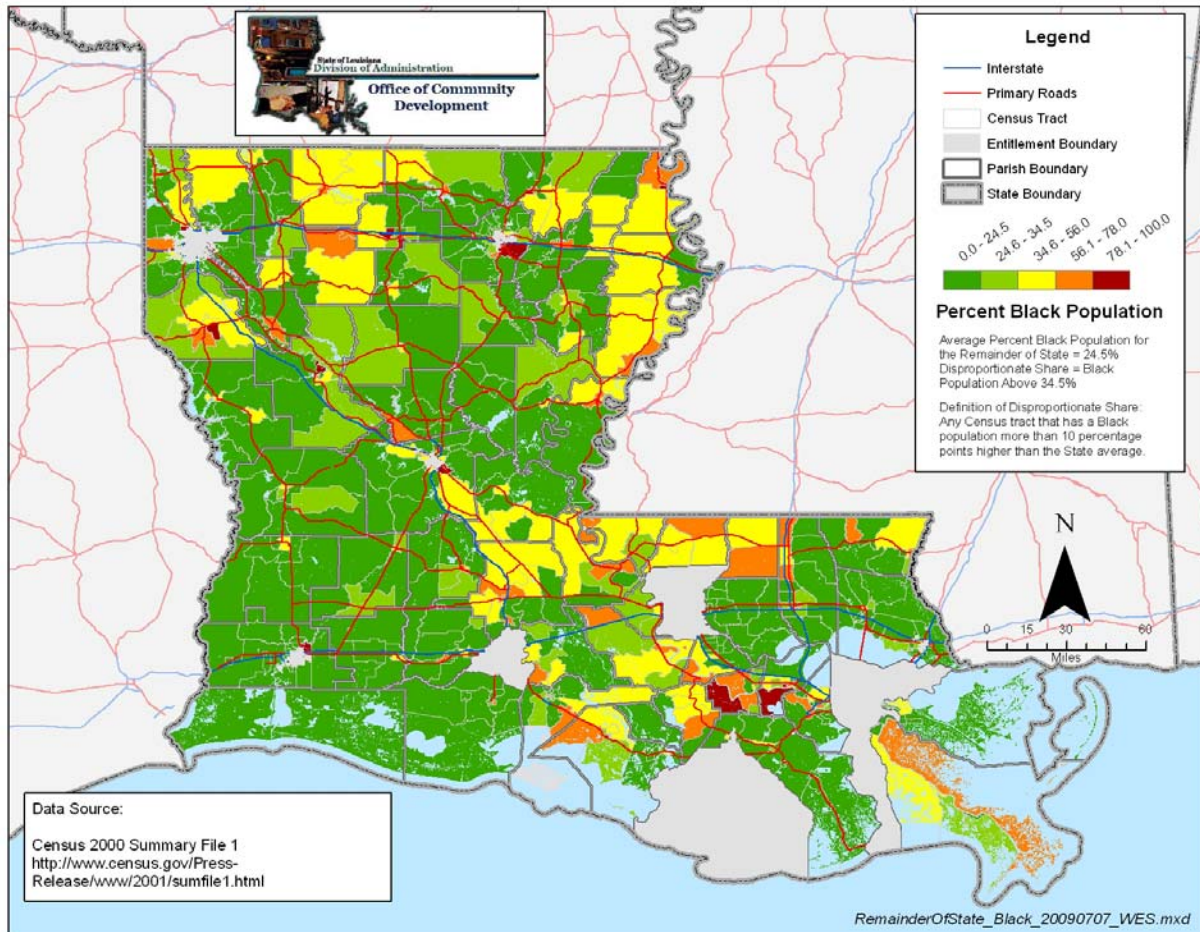
Table 2.4	
Population by Race	
Balance of State	
2000 Census SF1 Data	
Race	Population
White	1,841,279
Black	629,676
American Indian	14,503
Asian	16,101
Native Hawaiian/Pacific Islander	638
Other	12,250
Two or More Races	23,627
Total	2,538,074
Hispanic	43,455

Data from the ACS provide another source of information about recent changes in racial demographics in the balance of the state. As seen in Table 2.7, the most significant change between 2005 and 2007 was an increase of almost 372.3 percent in the Native Hawaiian/Pacific Islander population, followed by an increase of nearly 19.8 percent in the Asian population. There was also small growth in the black population and a slight decrease in the white population.

Table 2.5			
Population by Race			
Balance of State			
2005 & 2007 American Community Survey Data			
Race	2005	2007	% Change
White	1,359,696	1,348,439	-0.8%
Black	523,977	573,451	9.4%
American Indian	10,450	8,634	-17.4%
Asian	10,302	12,344	19.8%
Native Hawaiian/Pacific Islander	195	921	372.3%
Other	13,379	11,735	-12.3%
Two or More Races	19,312	23,797	23.2%
Total	1,937,311	1,979,321	2.2%

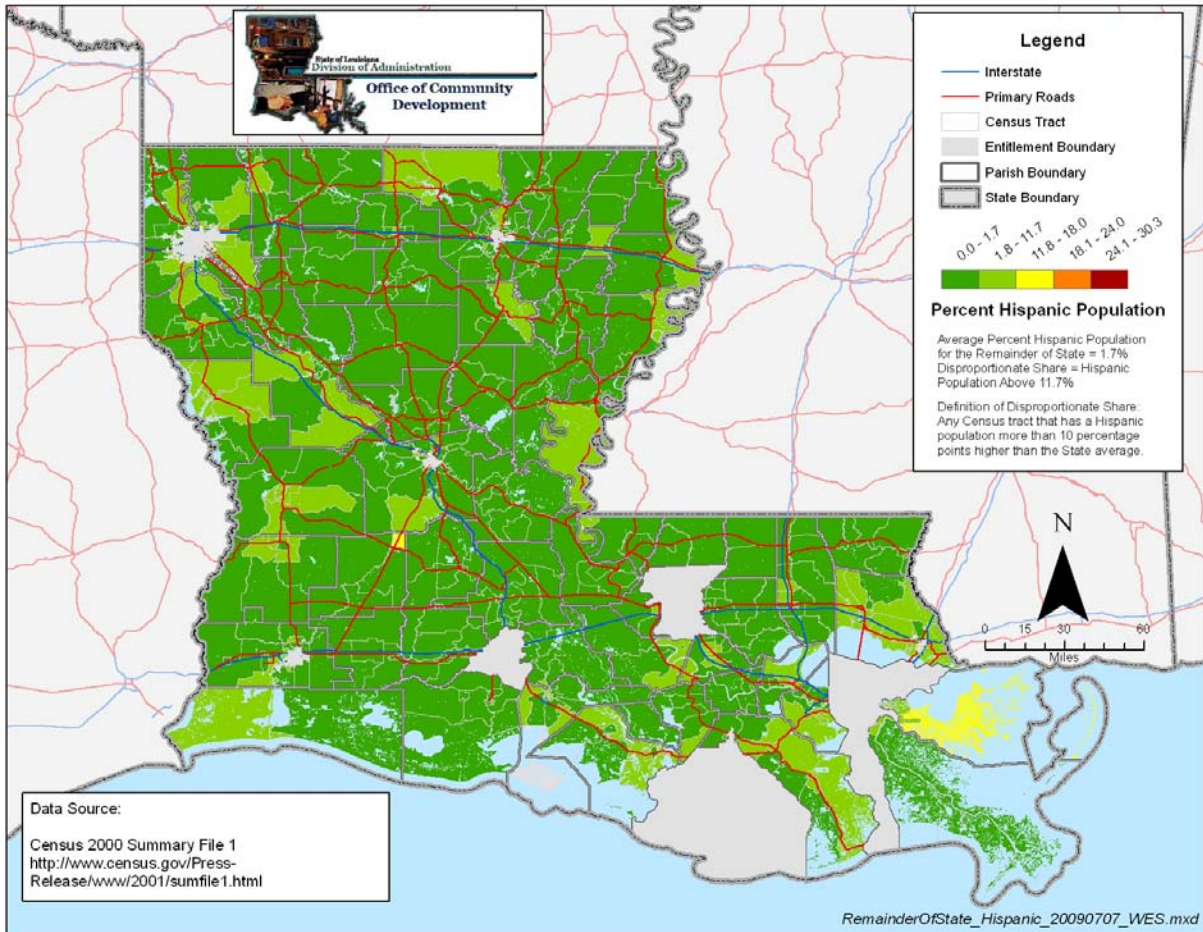
An analysis of the geographic distribution of racial and ethnic populations was conducted by comparing the average share of a certain population to the share of all census tracts in the balance of the state. The computed census tract shares were then plotted on a geographic map to determine if the areas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

Map 2.1
Concentration of Black Population
 Balance of State
 2000 Census Data



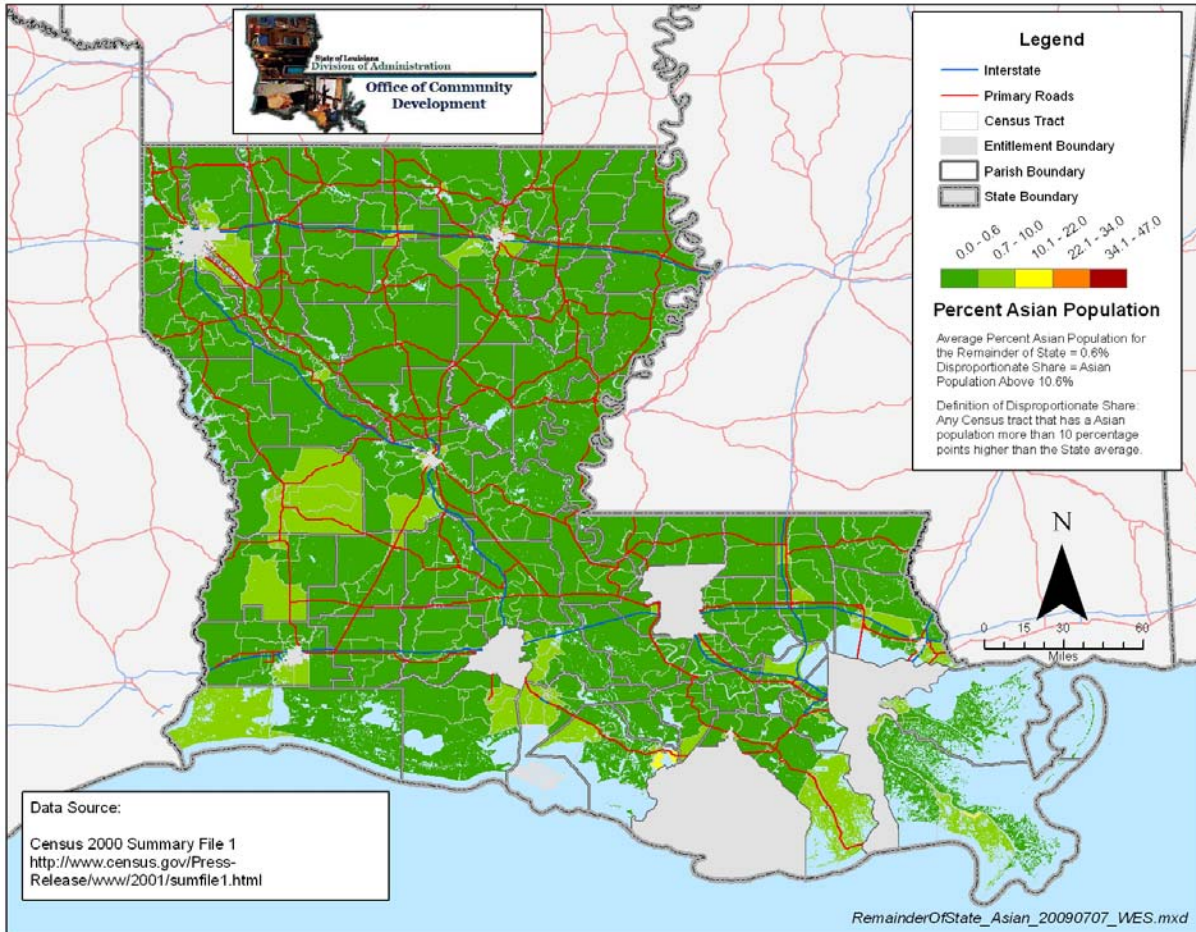
A similar spatial evaluation of the concentration of the Hispanic population revealed that the very few areas with a disproportionate share were located in the middle and southeast parts of the non-entitlement areas of Louisiana, as seen in Map 2.2.

Map 2.2
Concentration of Hispanic Population
Balance of State
2000 Census Data



An analysis of the Asian population in Map 2.3 showed that there were no disproportionate concentrations in the balance of the state and that the Asian population was fairly well distributed across census tracts.

Map 2.3
Concentration of Asian Population
Balance of State
2000 Census Date



DISABILITY STATUS

Disability is defined by the Census Bureau as a lasting physical, mental or emotional condition that makes it difficult for a person to do activities or impedes them from being able to go outside the home alone or to work.⁵ Defined in this fashion, the disabled population comprised 21.7 percent of the balance of the state's population in 2000, as seen in Table 2.8.

Age	Population
5 to 15	30,195
16 to 64	333,158
Over 65	133,324
Total	496,677
Disability Rate	21.7%

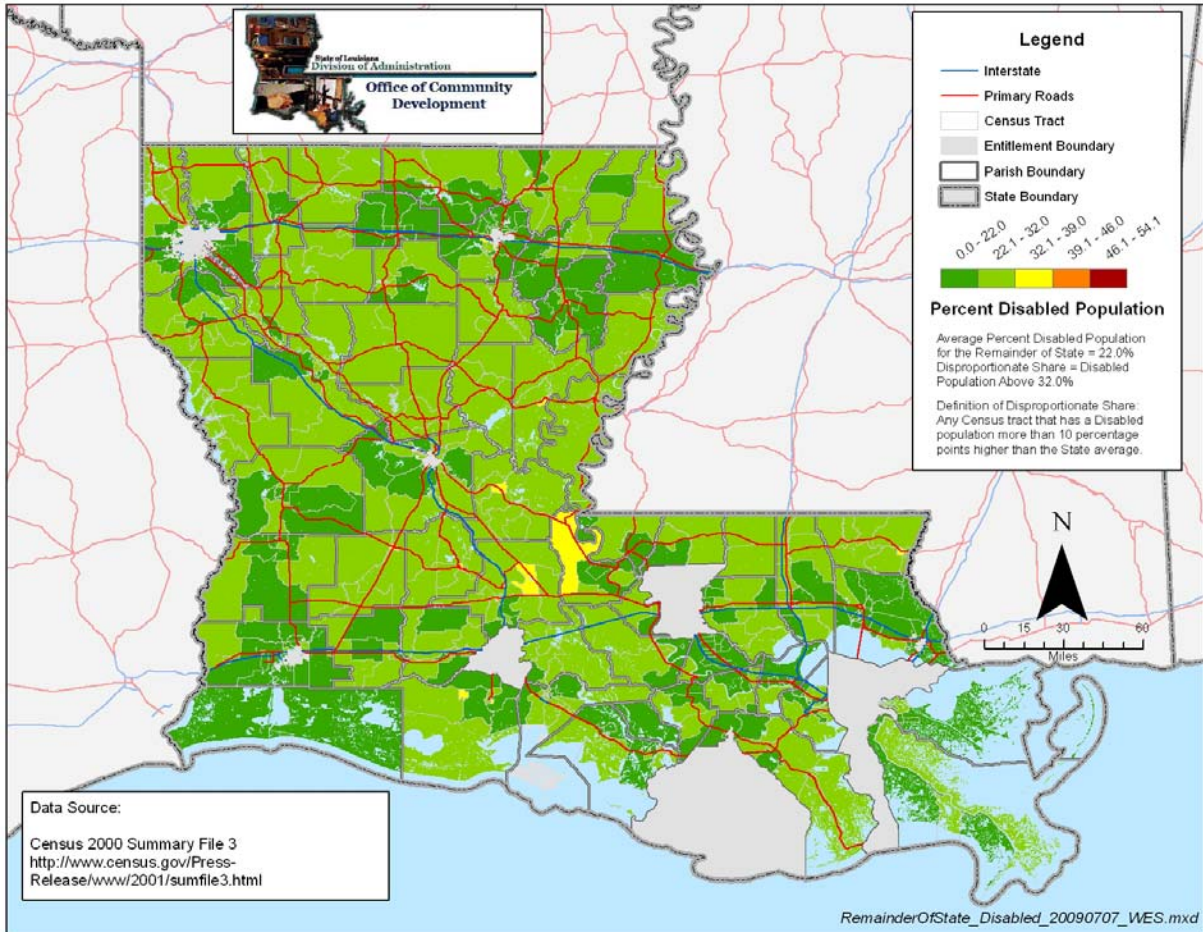
As shown in Table 2.9, the size of the disabled population from 2005 through 2007 decreased slightly, falling by only 4.0 percent. The actual proportion of the balance of the state's population with a disability decreased from 20.0 percent in 2005 to 19.4 percent in 2007. Among different age groups, the number of persons with disabilities in the 5 to 15 age cohort decreased by a moderate amount, dropping by 11.6 percent.

Age	2005	2007	% Change
5 to 15	27,812	24,585	-11.6%
16 to 64	210,421	197,545	-6.1%
Over 65	107,983	110,107	2.0%
Total	346,216	332,237	-4.0%
Disability Rate	20.0%	19.4%	-0.6%

⁵ The data on disability status were derived from answers to long-form questionnaire items 16 and 17 for the 1-in-6 sample. Item 16 asked about the existence of the following long-lasting conditions: (a) blindness, deafness, or a severe vision or hearing impairment, (sensory disability) and (b) a condition that substantially limits one or more basic physical activities such as walking, climbing stairs, reaching, lifting, or carrying (physical disability). Item 16 was asked of a sample of the population five years old and over. Item 17 asked if the individual had a physical, mental or emotional condition lasting 6 months or more that made it difficult to perform certain activities. The four activity categories were: (a) learning, remembering, or concentrating (mental disability); (b) dressing, bathing, or getting around inside the home (self-care disability); (c) going outside the home alone to shop or visit a doctor's office (going outside the home disability); and (d) working at a job or business (employment disability). Categories 17a and 17b were asked of a sample of the population five years old and over; 17c and 17d were asked of a sample of the population 16 years old and over. For data products which use the items individually, the following terms are used: sensory disability for 16a, physical disability for 16b, mental disability for 17a, self-care disability for 17b, going outside the home disability for 17c, and employment disability for 17d. For data products which use a disability status indicator, individuals were classified as having a disability if any of the following three conditions was true: (1) they were five years old and over and had a response of "yes" to a sensory, physical, mental or self-care disability; (2) they were 16 years old and over and had a response of "yes" to going outside the home disability; or (3) they were 16 to 64 years old and had a response of "yes" to employment disability.

Map 2.4 shows the distribution of the disabled population in the balance of the state according to the 2000 census and reveals disproportionate shares of disabled persons in the central part of the state.

Map 2.4
Percent of Population with a Disability by Census Tract
Balance of State
2000 Census Data



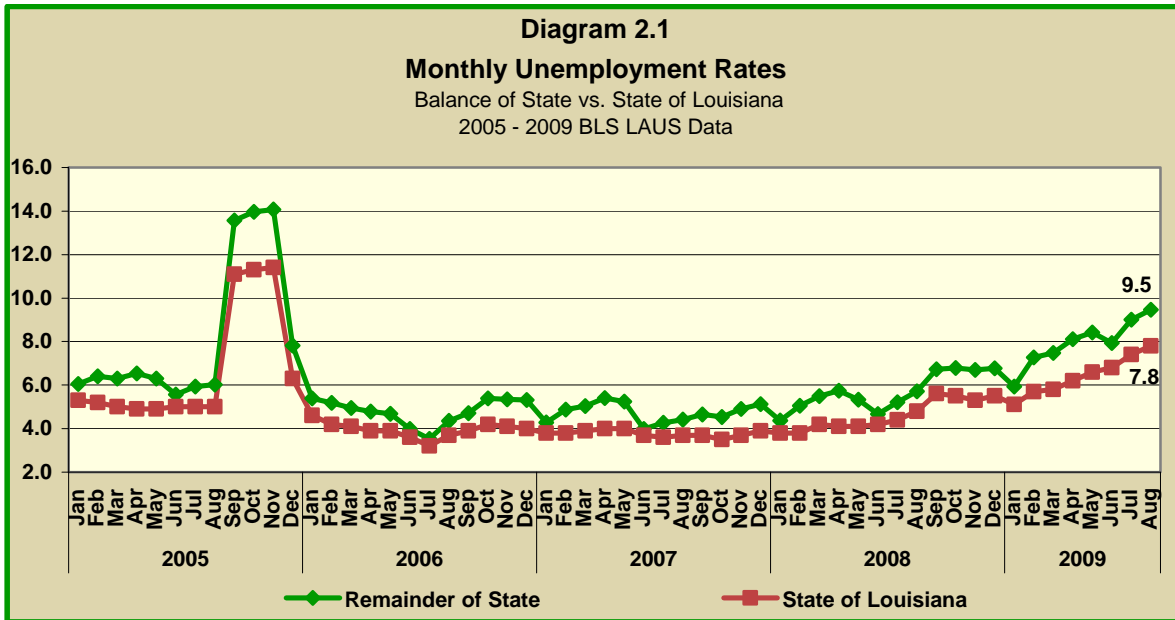
ECONOMICS

LABOR FORCE AND EMPLOYMENT

According to the Bureau of Labor Statistics (BLS), the labor force is defined as people working or looking for work. As depicted in Table 2.10, the labor force increased by a little over 88,400 persons from 2000 to 2008, rising from 994,606 persons to 1,083,008. The number of unemployed persons increased during the same time period from 55,553 to 56,541.

Table 2.8					
Labor Force Statistics					
Balance of State					
Bureau of Labor Statistics					
Year	Labor Force	Employment	Unemployment	Balance Unemployment Rate	Louisiana Unemployment Rate
1990	880,297	908,231	58,908	6.7	5.9
1991	903,970	920,156	72,174	8.0	6.9
1992	920,303	929,518	80,875	8.8	7.9
1993	892,827	905,688	73,066	8.2	7.4
1994	921,083	930,486	77,936	8.5	7.5
1995	931,420	950,140	69,226	7.4	6.7
1996	944,564	966,827	66,917	7.1	6.3
1997	956,000	982,383	62,645	6.6	5.7
1998	967,715	997,711	60,153	6.2	5.3
1999	970,082	1,007,850	53,796	5.5	4.7
2000	994,606	1,037,661	55,553	5.6	5.0
2001	999,742	1,036,056	60,407	6.0	5.4
2002	995,581	1,024,789	65,741	6.6	5.9
2003	1,007,822	1,032,646	70,724	7.0	6.2
2004	1,018,225	1,052,081	63,141	6.2	5.5
2005	1,464,404	1,458,933	108,955	7.4	6.7
2006	1,369,598	1,414,150	59,796	4.4	3.9
2007	1,057,607	1,119,497	45,721	4.3	3.8
2008	1,083,008	1,136,194	56,541	5.2	4.6

When the number of employed persons grows more slowly than the size of the labor force, unemployment rises. Monthly unemployment rates from the BLS, presented in Diagram 2.1, show the unemployment rate spiked in 2005 after Hurricanes Katrina and Rita, fell to a low of just below 4.0 percent in 2006, and then steadily rose again to 9.5 percent in August 2009.

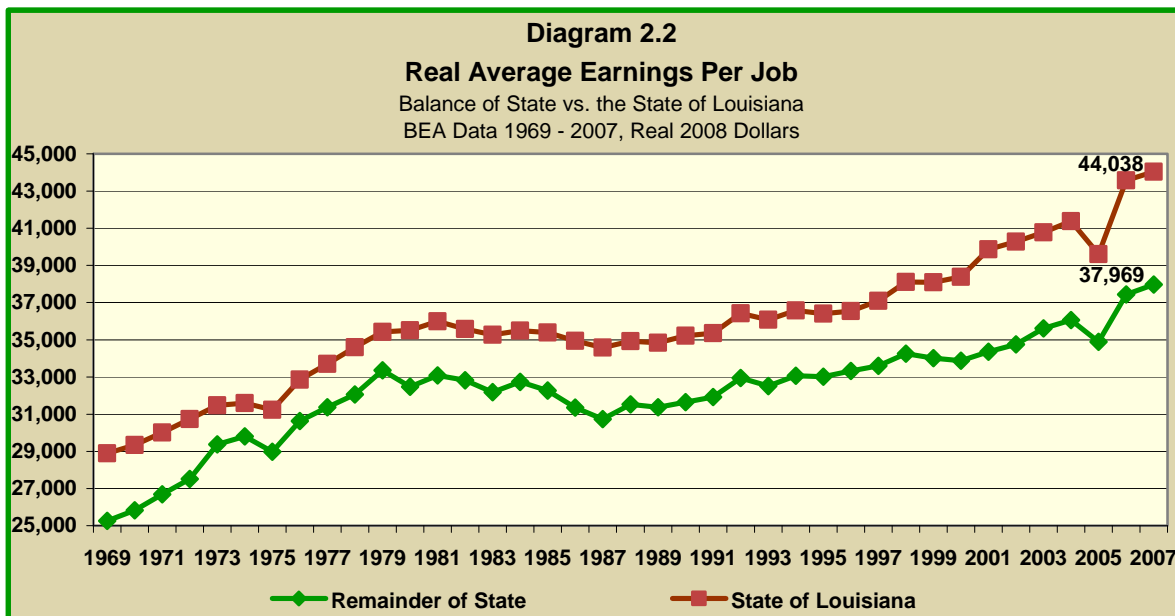


The Bureau of Economic Analysis (BEA) provides an alternate view of employment: a count of both full- and part-time jobs, although it is only available at the parish level. Thus, a person working more than one job can be counted more than once. Table 2.11 shows that from 2000 to 2007 the number of jobs increased by almost 83,951, from 724,346 in 2000 to 808,297 in 2007. Average earnings per job also increased during the same time period, from \$33,878 in 2000 to \$37,969 in 2007.

Another perspective of the economy involves comparing the total of all forms of income: wages earned, transfer payments and property income, such as dividends, interest and rents. When these data are added together and divided by population, per capita income is the result. Table 2.11 also shows that per capita income rose to \$63,007 in 2007, up from \$55,870 in 2000.

Year	1,000s of 2008 Dollars						Per Capita Income	Total Employment	Average Real Earnings Per Job
	Earnings	Social Security Contributions	Residents Adjustments	Dividends, Interest, Rents	Transfer Payments	Personal Income			
2000	24,539,388	2,353,244	3,872,297	6,136,873	8,274,187	40,469,499	55,870	724,346	33,878
2001	25,152,489	2,416,029	4,245,041	6,015,681	9,790,652	42,787,834	58,432	732,266	34,349
2002	25,562,162	2,473,102	4,205,625	5,400,103	10,245,354	42,940,141	58,375	735,589	34,751
2003	26,488,190	2,504,649	4,278,389	4,969,386	10,132,256	43,363,572	58,296	743,853	35,609
2004	27,178,193	2,541,993	4,241,729	4,913,051	10,730,264	44,521,244	59,074	753,657	36,062
2005	26,678,310	2,640,206	4,373,346	864,334	13,237,977	42,513,761	55,587	764,815	34,882
2006	29,349,581	2,907,020	4,711,174	5,738,173	11,410,333	48,302,241	61,612	783,972	37,437
2007	30,690,115	3,056,221	5,047,549	6,969,612	11,277,445	50,928,499	63,007	808,297	37,969

Diagram 2.2 shows that average earning per job in the balance of the state steadily increased, but were still below the earnings seen statewide as of 2007.



HOUSEHOLD INCOME

At the time that the 2000 census was taken, households with incomes under \$15,000 comprised the largest portion of the populace, with 218,924 households out of 914,797 in that category, as seen in Table 2.12.

Table 2.13 presents data from the ACS on household income from 2005 to 2007 for the non-entitlement areas in the state. The change in the number of households in each income category was not uniform. The largest increase was in households generating income above \$100,000 with 42.2 percent more households after the storms. Decreases were also seen in households with incomes below \$19,999 and the \$25,000 to \$34,999 income bracket.

Income (\$)	Households
Under 15,000	218,924
15,000 - 19,999	68,928
20,000 - 24,999	67,147
25,000 - 34,999	122,107
35,000 - 49,999	146,169
50,000 - 74,999	158,577
75,000 - 99,999	71,587
100,000 and above	61,358
Total	914,797

Table 2.11			
Households by Income			
Balance of State			
2005 & 2007 American Community Survey Data			
Income	2005	2007	% Change
Under 15,000	167,372	146,891	-12.2%
15,000 - 19,999	54,289	49,234	-9.3%
20,000 - 24,999	46,658	48,551	4.1%
25,000 - 34,999	85,865	81,084	-5.6%
35,000 - 49,999	103,544	99,868	-3.6%
50,000 - 74,999	119,414	117,485	-1.6%
75,000 - 99,999	68,069	71,771	5.4%
100,000 and above	60,002	85,346	42.2%
Total	705,213	700,230	-0.7%

POVERTY

The Census Bureau uses a set of income thresholds that vary by family size and composition to determine poverty status. If a family's total income is less than the threshold for their size, then that family, and every individual in it, is considered poor. The poverty thresholds do not vary geographically, but they are updated annually for inflation using the Consumer Price Index. The official poverty definition counts income before taxes and does not include capital gains and non-cash benefits, such as public housing, Medicaid and food stamps. Poverty is not defined for people in military barracks, institutional group quarters, or for unrelated individuals under age 15, including foster children. These groups are considered to be neither poor nor nonpoor.

Table 2.14 relays poverty statistics for non-entitlement areas in Louisiana. The poverty rate in 2000 was 18.6 percent, and there were 457,292 total persons living in poverty. There were 57,208 persons under the age of five and an additional 48,990 persons aged 65 or older living in poverty at the time the 2000 census was taken.

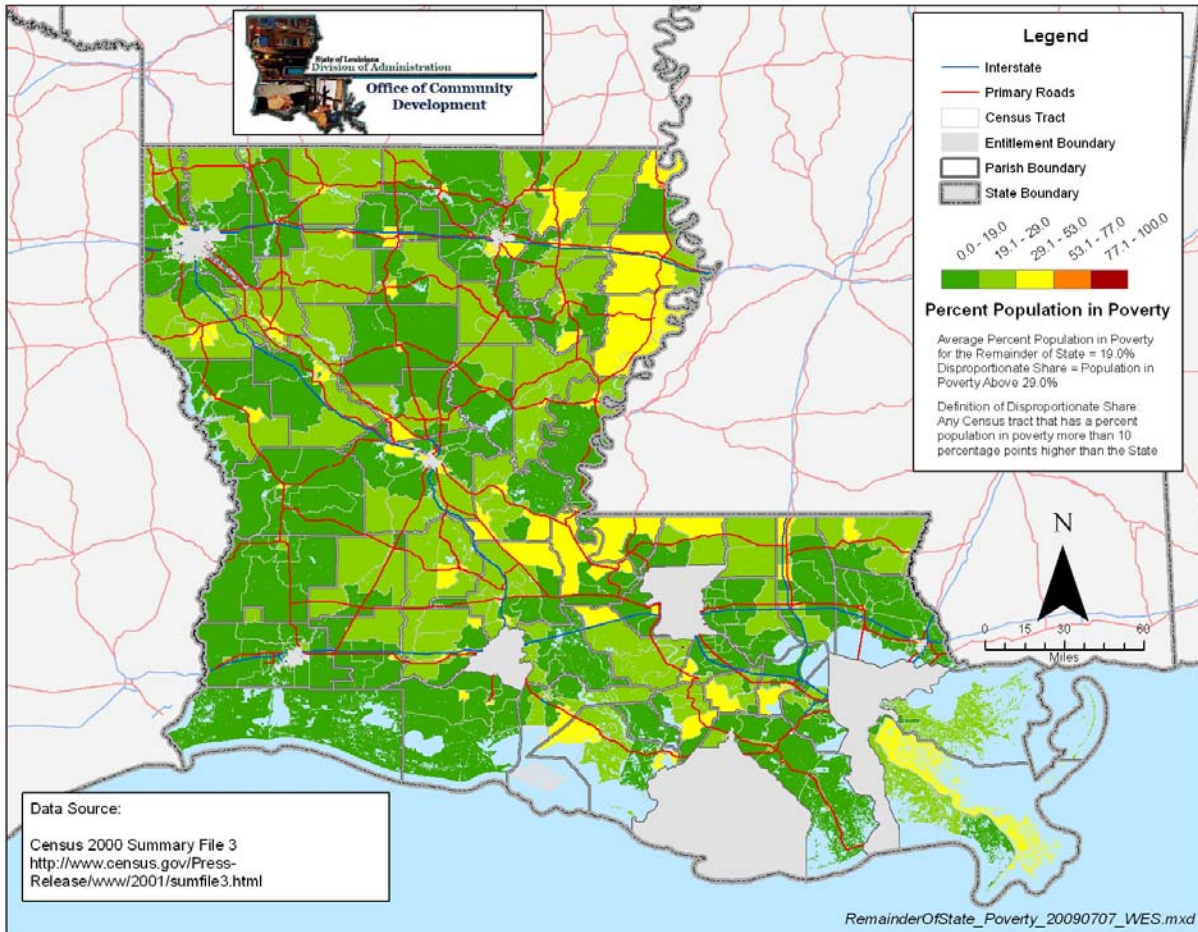
Table 2.12	
Poverty by Age	
Balance of State	
2000 Census SF3 Data	
Age	Population
5 and Below	57,208
6 to 18	112,648
19 to 64	238,446
65 and Older	48,990
Total	457,292
Poverty Rate	18.6%

As shown in Table 2.15, between 2005 and 2007 the number of persons whose income fell below the poverty line declined from 346,216 individuals in 2005 to 332,237 individuals in 2007.

Table 2.13			
Poverty by Age			
Balance of State			
2005 & 2007 American Community Survey Data			
Age	2005	2007	% Change
5 to 15	27,812	24,585	-11.6%
16 to 64	210,421	197,545	-6.1%
Over 65	107,983	110,107	2.0%
Total	346,216	332,237	-4.0%
Disability Rate	20.0%	19.4%	-0.6%

Equally important, the poverty rate was not uniform throughout the balance of the state, as some areas had much higher concentrations of poverty than others. A computation was used to measure the concentration of poverty. Again, an area with a disproportionate share of poverty would have a poverty rate of more than 10 percentage points above the jurisdiction average. As illustrated by Map 2.5, disproportionate shares of poverty were spread throughout the non-entitlement areas of the state.

Map 2.5
Poverty Rate by Census Tract
 Balance of State
 2000 Census Data



HOUSING

Table 2.16 presents data on the type of housing units counted in the 2000 census. The vast majority of housing units in the balance of the state were single-family units, representing 721,737 units out of 1,030,347 total units. There were also a fair number of apartments and multiplexes, with 40,180 and 27,027 units, respectively.

ACS data on housing unit types are presented in Table 2.17. Overall, the number of housing units from 2005 through 2007 increased by 0.4 percent, but this increase was not uniform. In fact, the number of single-family and duplex units dropped with declines of 1.3 percent and 13.4 percent, respectively. The number of apartments edged up slightly by 9.7 percent, and the number of boats, RV, van, etc. units as housing jumped by 54.8 percent.⁶

Table 2.14
Housing Units by Unit Type

Balance of State
2000 Census SF3 Data

Unit Type	Units
Single-Family Unit	721,737
Duplex	23,419
Tri- or Four-Plex	27,027
Apartments	40,180
Mobile Homes	213,419
Boat, RV, Van, Etc.	4,565
Total	1,030,347

Table 2.15
Housing Units by Unit Type

Balance of State
2005 & 2007 American Community Survey Data

Unit Type	2005	2007	% Change
Single-Family Unit	572,564	564,890	-1.3%
Duplex	26,894	23,284	-13.4%
Tri- or Four-Plex	19,133	20,479	7.0%
Apartments	26,297	28,855	9.7%
Mobile Homes	176,145	186,077	5.6%
Boat, RV, Van, Etc.	721	1,116	54.8%
Total	821,754	824,701	0.4%

Table 2.18 presents a count of the housing stock at the time of the 2000 census, including both occupied and vacant units. There were 697,989 owner-occupied units compared to 216,186 renter-occupied units, suggesting that while the majority of the market was owner-occupied, about 76.4 percent, there was still a large contingency of renters. Furthermore this rate was higher than the statewide rate of 67.9 percent at that time.

ACS data regarding a comparison of tenure from 2005 and 2007 is displayed in Table 2.19. This table shows that the number of renter-occupied units increased by 2.5 percent while owner-occupied units decreased by 1.9 percent. Additionally, the number of vacant housing units in the balance of the state increased by 6.8 percent.

Table 2.16
Housing Units by Tenure

Balance of State
2000 Census SF3 Data

Unit Tenure	Units
Occupied Housing Units	914,175
Owner-Occupied	697,989
Renter-Occupied	216,186
Vacant Housing Units	116,172
Total Housing Units	1,030,347

⁶ Data are estimates of the actual figures that would have been obtained by interviewing the entire population using the same methodology. Sampling error in data will arise due to the use of probability sampling and results and should be treated as statistical estimates. For further discussion on sampling error and information regarding the calculation of confidence intervals see: <http://www.census.gov/acs/www/UseData/Accuracy/Accuracy1.htm>

Table 2.17			
Housing Units by Tenure			
Balance of State			
2005 & 2007 American Community Survey Data			
Unit Tenure	2005	2007	% Change
Occupied Housing Units	705,213	700,230	-0.7%
Owner-Occupied	518,678	508,959	-1.9%
Renter-Occupied	186,535	191,271	2.5%
Vacant Housing Units	116,541	124,471	6.8%
Total Housing Units	821,754	824,701	0.4%

As shown in Table 2.20, the hurricanes also spurred home construction, with slightly less than 31,000 new units built in the balance of the state between 2005 and 2007.

Table 2.18			
Housing Units by Year Built			
Balance of State			
2005 & 2007 American Community Survey Data			
Year Built	2005	2007	% Change
1939 or earlier	53,505	50,389	-5.8%
1940 to 1949	46,342	40,934	-11.7%
1950 to 1959	86,832	81,485	-6.2%
1960 to 1969	116,927	105,458	-9.8%
1970 to 1979	165,267	161,694	-2.2%
1980 to 1989	152,539	145,239	-4.8%
1990 to 1999	134,737	131,686	-2.3%
2000 to 2004	60,939	72,209	18.5%
2005 or later	4,666	35,607	663.1%
Total	821,754	824,701	0.4%
Median	53,505	50,389	-5.8%

VACANT HOUSING UNITS

Table 2.21 provides data on the disposition of vacant housing units. These data show that 23,003 of the 116,172 vacant units were for rent, for a vacancy rate of 9.6 percent. The largest number of these vacant units, 36,605, were vacant because they were for seasonal, recreational or occasional use.

Data from the ACS about the disposition of vacant housing units between 2005 and 2007 are presented in Table 2.22. These data show large decreases in both the number of vacant units for rent and vacant units for sale, but an even larger increase, 841.6 percent, in the number of units that were for migrant workers.

Table 2.19	
Disposition of Vacant Units	
Balance of State	
2000 Census SF3 Data	
Disposition	Units
For Rent	23,003
For Sale	14,589
Rented or Sold, Not Occupied	14,551
For Seasonal, Recreational or Occasional Use	36,605
For Migrant Workers	520
Other Vacant	26,904
Total	116,172

Disposition	2005	2007	% Change
For Rent	17,831	16,627	-6.8%
For Sale	9,712	8,117	-16.4%
Rented or Sold, Not Occupied	8,649	7,200	-16.8%
For Seasonal, Recreational, or Occasional Use	31,852	39,049	22.6%
For Migrant Workers	113	1,064	841.6%
Other Vacant	68,477	66,488	-2.9%
Total	136,634	138,545	1.4%

HOUSING PROBLEMS

While the 2000 census does not report significant details regarding the physical condition of housing units, information regarding overcrowding, incomplete plumbing or kitchen facilities, and cost burden is available.⁷

Overcrowding is defined as having from 1.1 to 1.5 people per room in a residence, with severe overcrowding defined as having more than 1.5 people per room. Table 2.23 shows that overall, 3.3 percent of households were overcrowded and 1.4 percent were severely overcrowded. Renters represented the larger share of overcrowding, with 5.5 percent of renters experiencing overcrowding and 2.8 percent of renters experiencing severe overcrowding versus 2.7 percent of owners experiencing overcrowding and 1.0 percent of owners experiencing severe overcrowding.

Balance	No Overcrowding	Overcrowding	Severe Overcrowding	Total
Owner				
Households	672,668	18,680	6,641	697,989
Percent	96.4%	2.7%	1.0%	100.0%
Renter				
Households	198,284	11,881	6,021	216,186
Percent	91.7%	5.5%	2.8%	100.0%
Total				
Households	870,952	30,561	12,662	914,175
Percent	95.3%	3.3%	1.4%	100.0%

⁷ These data are derived from the one in six sample, also called Summary File 3 or SF3 data and consist of 813 detailed tables of Census 2000 social, economic and housing characteristics compiled from a sample of approximately 19 million housing units (about 1 in 6 households) that received the Census 2000 long-form questionnaire. Source: <http://www.census.gov/Press-Release/www/2002/sumfile3.html>. These sample data include sampling error and may not sum precisely to the 100 percent sample typically presented in the 2000 census.

Incomplete plumbing and kitchen facilities are another indicator of potential housing problems. According to the Census Bureau, a housing unit is classified as lacking complete plumbing facilities when any of the following are not present: piped hot and cold water, a flush toilet, and a bathtub or shower. Likewise, a unit is categorized as deficient when any of the following are missing from the kitchen: a sink with piped hot and cold water, a range or cook top and oven, and a refrigerator. At the time of the 2000 census, Table 2.25 shows that 18,601 housing units did not have complete kitchen facilities and 16,585 did not have complete plumbing facilities.

Table 2.22 Housing Units with Incomplete Kitchen or Plumbing Facilities Balance of State 2000 Census SF3 Data	
Facilities	Units
Lacking Complete Kitchen Facilities	18,601
Lacking Complete Plumbing Facilities	16,585

As shown in Table 2.26, the number of housing units with incomplete kitchen facilities in the balance of the state was fairly high in 2005 but were much less in 2007, with a 16.3 percent drop in the number of units with incomplete kitchen facilities. However, the number of units with incomplete plumbing facilities increased by 4.9 percent from 2005 to 2007.

Table 2.26 Housing Units with Incomplete Plumbing or Kitchen Facilities Balance of State 2005 & 2007 American Community Survey Data			
Facilities	2005	2007	% Change
Lacking Complete Kitchen Facilities	4,446	3,722	-16.3%
Lacking Complete Plumbing Facilities	3,868	4,059	4.9%

The third type of consideration pertaining to housing problems reported in the 2000 census is cost burden. Cost burden is defined as gross housing costs that range from 30 to 50 percent of gross household income; severe cost burden is defined as gross housing costs that exceed 50 percent of gross household income. For homeowners, gross housing costs include property taxes, insurance, energy payments, water and sewer service, and refuse collection. If the homeowner has a mortgage, the determination also includes principal and interest payments on the mortgage loan. For renters, this figure represents monthly rent and selected electricity and natural gas charges. Table 2.27 shows that 11.7 percent of all households in the balance of the state had a cost burden and 9.5 percent had a severe cost burden. When broken down by tenure renters have an even higher cost burden, with 16.0 percent of renters having a cost burden versus 14.0 percent of owners with mortgages. For severe cost burden 15.9 percent of renters were in this condition and only 9.2 percent of owners with mortgages.

Table 2.27					
Percent of Income Spent on Housing					
Balance of State					
Census 2000 SF3 Data					
Balance	Less than 30.0%	31% - 50%	Above 50%	Not Computed	Total
Renter					
Households	102,749	33,772	33,736	41,421	211,678
Percent	48.5%	16.0%	15.9%	19.6%	100.0%
Owner With Mortgage					
Households	209,849	38,563	25,399	2,616	276,427
Percent	75.9%	14.0%	9.2%	0.9%	100.0%
Owner Without Mortgage					
Households	183,456	12,564	9,465	30,195	235,680
Percent	77.8%	5.3%	4.0%	12.8%	100.0%
Total					
Households	496,054	84,899	68,600	74,232	723,785
Percent	68.5%	11.7%	9.5%	10.3%	100.0%

Table 2.28 shows the same concept but with data reported by the ACS for 2005 and 2007. Overall, the number of households with a cost burden increased from 24.6 percent to 24.9 percent. The number of owners with a mortgage who experienced a cost burden rose from 26.5 percent to 27.4 percent while the number of renters with a cost burden increased slightly from 37.3 percent to 37.4 percent.

Table 2.28									
Percent of Income Spent on Housing									
Balance of State									
2005 & 2007 American Community Survey Data									
Percentage		Owner With Mortgage		Owner Without Mortgage		Renter		Total	
		Households	Percent	Households	Percent	Households	Percent	Households	Percent
Less than 30.0%	2005	223,640	72.4%	228,215	85.9%	86,117	42.0%	537,972	69.0%
	2007	219,500	72.0%	226,862	87.0%	82,978	39.3%	529,340	68.2%
	% Change	-1.9%	-0.4%	-0.6%	1.1%	-3.6%	-2.6%	-1.6%	-0.8%
30.1 % or More	2005	81,779	26.5%	33,543	12.6%	76,396	37.3%	191,718	24.6%
	2007	83,524	27.4%	30,795	11.8%	78,924	37.4%	193,243	24.9%
	% Change	2.1%	0.9%	-8.2%	-0.8%	3.3%	0.2%	0.8%	0.3%
Not Computed	2005	3,621	1.2%	3,802	1.4%	42,567	20.8%	49,990	6.4%
	2007	1,847	0.6%	3,067	1.2%	48,972	23.2%	53,886	6.9%
	% Change	-49.0%	-0.6%	-19.3%	-0.3%	15.0%	2.5%	7.8%	0.5%
Total	2005	309,040	100.0%	265,560	100.0%	205,080	100.0%	779,680	100.0%
	2007	304,871	100.0%	260,724	100.0%	210,874	100.0%	776,469	100.0%
	% Change	-1.3%	0.0%	-1.8%	0.0%	2.8%	0.0%	-0.4%	0.0%

Households experiencing a severe cost burden are at risk. Such renters with just one financial setback may have to choose between rent and food or rent and healthcare for their family. Similarly, such homeowners with a mortgage and one unforeseen financial issue, such as temporary illness, divorce or the loss of employment may be forced to face foreclosure or bankruptcy. Both face the prospect of homelessness. Furthermore,

households that no longer have a mortgage yet still experience a severe cost burden may be unable to conduct periodic maintenance and repair of their home, contributing to dilapidation and blight. These situations should be of concern to policy makers and program managers.

SUMMARY

DEMOGRAPHICS

The population in the balance of the state increased slightly from 2000 to 2007 by 5.7 percent, resulting in a net increase of 145,689 inhabitants. Intercensal estimates show moderate growth rates for older age cohorts between 2005 and 2007. Younger age cohorts also experienced growth, with only the age cohort of 35 to 54 experiencing a decline, falling by 1.5 percent.

In 2000, blacks comprised the largest minority group with 629,676 people or 24.8 percent of the population. There were many concentrated areas of black population throughout the non-entitlement areas of the state, with some census tracts showing over 78.1 percent black population in 2000. The black population experienced moderate growth from 2005 to 2007, but Asian, Native Hawaiian/Pacific Islander, and Hispanic populations expanded much more rapidly, while whites experienced a slight decline of 0.8 percent.

The balance of the state's population had a disability rate of 21.7 percent in 2000, and people with disabilities were concentrated in the central area of the state.

ECONOMICS

The labor force, defined as people working or looking for work, rose from 880,297 to 1,083,008 from 1990 to 2008, a rise of 23.0 percent. Unemployment fell by 2,367 during the same time period, resulting in the unemployment rate changing from 6.7 percent in 1990 to 5.2 percent in 2008.

In terms of earnings and income, average real earnings per job increased by \$4,091 from 2000 through 2007, from \$33,878 to \$37,969. Another measure, per capita income, also increased over the same time period from \$55,870 in 2000 to \$63,007 in 2007. The poverty rate was 18.6 percent in 2000 with 169,856 inhabitants under the age of 18 experiencing poverty. The poverty rate dropped slightly from 20.0 percent in 2005 to 19.4 percent in 2007, and the poverty rate was not even throughout the non-entitlement areas of the state, with many areas exhibiting disproportionately high concentrations of people in poverty.

HOUSING

Of the housing stock in the balance of the state in 2000, 721,737 units were single-family units, 23,419 units were duplexes, 27,027 units were tri- or four-plexes, 40,180 unit were apartments, 213,419 units were mobile homes, and 4,565 units were boats, RVs, or vans.

Of those total units, 697,989 were owner-occupied and 216,186 were renter-occupied, for a home ownership rate of 76.4 percent. More than 116,172 units were vacant, and, of those, 23,003 were for rent and 14,589 were for sale. Between 2005 and 2007 there was a decrease in single-family and duplex units while the number of apartments and multiplexes increased. The number of renter-occupied units increased along with the number of vacant housing units.

The non-entitlement areas of the state had a small number of households, 30,561, experiencing overcrowding in 2000, and those experiencing severe overcrowding were even fewer at 12,662 or 1.4 percent of all households. Renters tended to have overcrowded and severely overcrowded households more often than homeowners. In 2000, a combined 31.9 percent of renters had a cost burden or a severe cost burden as opposed to 23.2 percent of homeowners with mortgages with cost burdens or severe cost burdens. From 2005 to 2007, the percentage of owners with mortgages with a cost burden increased from 26.5 percent to 27.4 percent, while the number of renters with a cost burden remained relatively unchanged, rising from 37.3 percent to 37.4 percent.

SECTION III. LENDING PRACTICES

Since the 1970s, the federal government has enacted several laws aimed at promoting fair lending practices in the banking and financial services industries. Although the record is improving, discriminatory practices have not been entirely eliminated. A brief description of selected federal laws aimed at promoting fair lending follows:

The 1968 Fair Housing Act prohibits discrimination in housing based on race, color, religion or national origin. Later amendments added sex, familial status and disability. Under the Fair Housing Act, it is illegal to discriminate against any of the protected classes in the following types of residential real estate transactions: making loans to buy, build or repair a dwelling; selling, brokering or appraising residential real estate; or selling or renting a dwelling.

The Equal Credit Opportunity Act was passed in 1974 to prohibit discrimination in lending based on race, color, religion, national origin, sex, marital status, age, receipt of public assistance or the exercise of any right under the Consumer Credit Protection Act.⁸

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

Under the Home Mortgage Disclosure Act (HMDA), enacted in 1975 and later amended, financial institutions are required to publicly disclose the race, sex and income of mortgage applicants and borrowers by census tract. Analysis presented herein is from the HMDA data system.⁹

HOME MORTGAGE DISCLOSURE ACT DATA ANALYSIS

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

Reporting criteria for depository institutions are as follows:

1. The institution must be a bank, credit union or savings association.
2. The total assets must exceed the coverage threshold.¹⁰
3. The institution must have had a home or branch office in a metropolitan statistical area (MSA).

⁸ *Closing the Gap: A Guide to Equal Opportunity Lending*, The Federal Reserve Bank of Boston, April 1993.

⁹ HMDA data are considered "raw" because they contain some data entry errors and incomplete loan applications.

¹⁰ Each December the Federal Reserve announces the threshold for the following year. The asset threshold may change from year to year, based on changes in the Consumer Price Index for Urban Wage Earners and Clerical Workers.

4. The institution must have originated at least one home purchase loan or refinancing of a home purchase loan secured by a first lien on a one-to-four-family dwelling.
5. The institution must be federally insured or regulated.
6. The mortgage loan must have been insured, guaranteed or supplemented by a federal agency or intended for sale to Fannie Mae or Freddie Mac.

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

1. The institution must be a for-profit organization.
2. The institution's home purchase loan originations must equal or exceed 10 percent of the institution's total loan originations, or more than \$25 million.
3. The institution must have had a home or branch office in an MSA or have received applications for, originated or purchased five or more home purchase loans, home improvement loans, or refinancing mortgages on property located in an MSA in the preceding calendar year.
4. The institution must have assets exceeding \$10 million or have originated 100 or more home purchases in the preceding calendar year.

HMDA data represent most mortgage lending activity and are thus the most comprehensive collection of information regarding home purchase originations, home remodel loan originations and refinancing available.

HMDA data for the non-entitlement areas of Louisiana were analyzed for the years 2002 through 2007.¹¹ As shown in Table 3.1, 1,086,076 loan applications were processed for home purchases, home improvements and refinancing. In most of these years, refinancing loans were the largest category. However, the ability to enter into a homeownership transaction is the focus of this particular analysis, so only home purchase loans were inspected.

Purpose	2002	2003	2004	2005	2006	2007	Total
Home Purchase	54,500	55,193	65,974	78,328	81,765	68,500	404,260
Home Improvement	17,909	15,735	18,504	19,091	19,197	20,627	111,063
Refinancing	101,176	131,573	101,395	87,393	76,131	72,790	570,458
Multi-Family Dwelling	153	142	0	0	0	0	295
Total	173,738	202,643	185,873	184,812	177,093	161,917	1,086,076

Of the 404,260 home purchase loan applications, 372,025 were related to owner-occupied applications, as shown in Table 3.2. This subset represents the particular aspect of the home loan data that will be examined herein.

¹¹ Starting in 2004, the HMDA data made substantive changes in reporting. It modified the way it handled Hispanic data, loan interest rates, as well as the reporting of multifamily loan applications.

Table 3.2							
Owner Occupancy Status for Home Purchase Loan Application							
Balance of State							
HMDA Data 2002 - 2007							
Status	2002	2003	2004	2005	2006	2007	Total
Owner Occupied	50,631	50,875	60,931	71,752	74,791	63,045	372,025
Not Owner Occupied	3,174	3,533	4,546	6,220	6,593	5,076	29,142
Not Applicable	695	785	497	356	381	379	3,093
Total	54,500	55,193	65,974	78,328	81,765	68,500	404,260

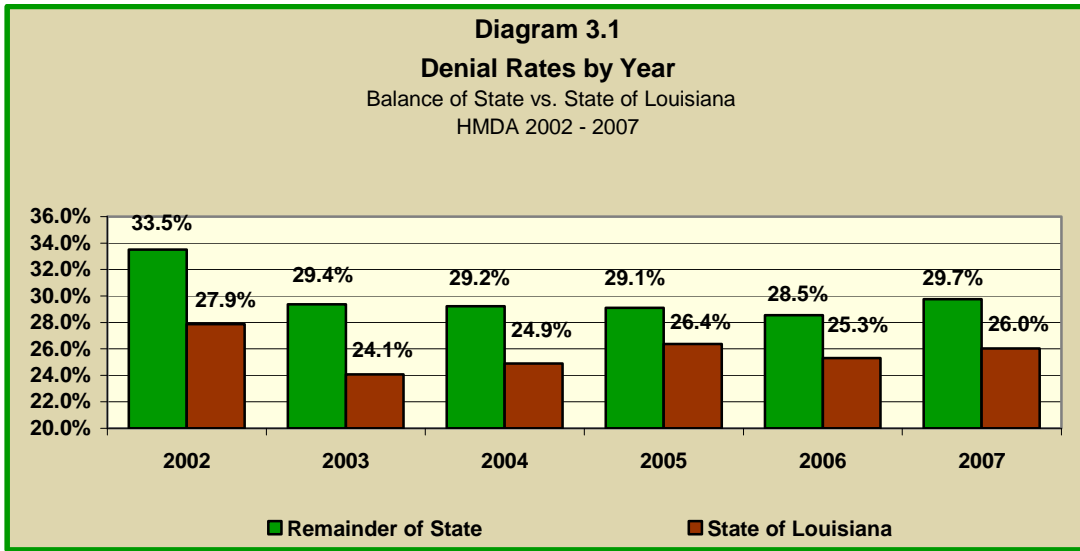
Financing institutions can take one of several actions pertaining to the loan application:

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

The outcome of the loan applications is presented in Table 3.3. Only loan originations and loan denials were inspected as an indicator of the underlying success or failure of home purchase loan applicants. In total, there were 169,199 loans originated and 71,901 loans denied, which resulted in a denial rate of 29.8 percent. The peak denial rate occurred in 2002 with a rate of 33.5 percent, while the lowest rate was seen in 2006 at 28.5 percent.

Table 3.3							
Owner-Occupied Home Purchase Loan Applications by Action Taken							
Balance of State							
HMDA Data 2002 - 2007							
Action	2002	2003	2004	2005	2006	2007	Total
Loan Originated	24,258	25,126	26,867	31,935	33,536	27,477	169,199
Application Approved But Not Accepted	4,515	3,696	4,673	5,975	6,566	5,079	30,504
Application Denied	12,223	10,446	11,087	13,113	13,397	11,635	71,901
Application Withdrawn By Applicant	2,408	2,404	3,055	4,451	4,737	3,852	20,907
File Closed for Incompleteness	806	810	1,070	1,484	1,553	1,332	7,055
Loan Purchased by the Institution	6,421	8,393	14,179	14,671	14,994	13,654	72,312
Preapproval Request Denied	0	0	0	123	3	9	135
Preapproval Request approved but not accepted	0	0	0	0	5	7	12
Total	50,631	50,875	60,931	71,752	74,791	63,045	372,025
Denial Rate	33.5%	29.4%	29.2%	29.1%	28.5%	29.7%	29.8%

Diagram 3.1 presents a comparison of loan denial rates for the balance of the state and the state of Louisiana for the years 2002 through 2007. Denial rates in the balance of the state were generally much higher than the denial rates seen statewide.



Map 3.1 presents data on the geographic distribution of denial rates and shows that some areas in the balance of the state had loan denial rates above 68.0 percent.

Map 3.1
HMDA Denial Rate
Balance of State
HMDA Data 2004 – 2007

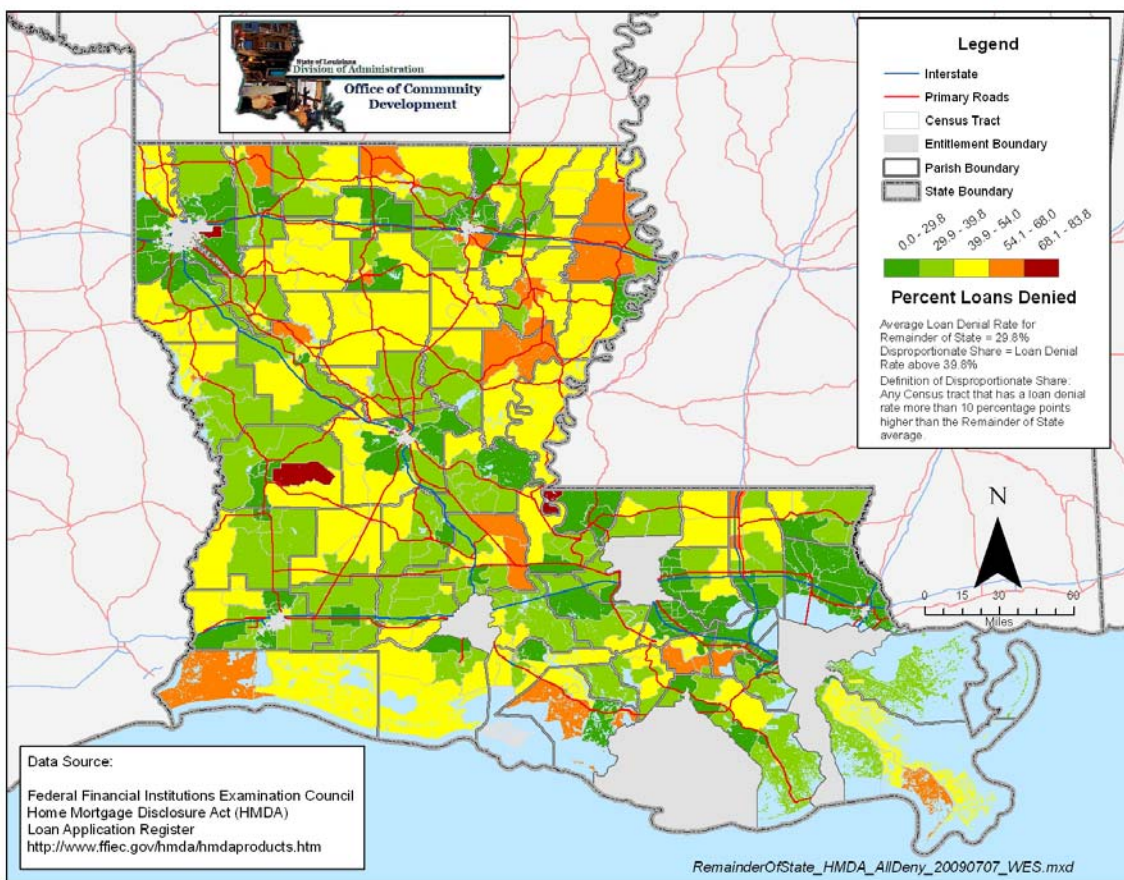


Table 3.4 presents data on the rationale for loan denial. This table shows that the most common reasons for denial of an owner-occupied loan application were debt-to-income ratio and credit history, which suggests that further education efforts may be needed for potential homebuyers regarding financial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

Denial Reason	2002	2003	2004	2005	2006	2007	Total
Debt-to-income Ratio	1,873	1,036	1,006	1,102	1,115	1,236	7,368
Employment History	202	164	129	224	231	223	1,173
Credit History	3,402	3,874	3,688	4,024	3,567	4,072	22,627
Collateral	421	384	453	661	695	557	3,171
Insufficient Cash	254	245	278	192	218	167	1,354
Unverifiable Information	53	92	215	345	318	223	1,246
Credit Application Incomplete	252	421	568	757	972	833	3,803
Mortgage Insurance Denied	1	2	8	19	6	4	40
Other	1,223	1,448	986	1,797	1,363	570	7,387
Missing	4,542	2,780	3,756	3,992	4,912	3,750	23,732
Total	12,223	10,446	11,087	13,113	13,397	11,635	71,901

Table 3.5 displays denial rates by gender. In every year, denial rates for females were consistently higher than denial rates for males. Over the six-year period, the average denial rates for a female head of household was 9.9 percentage points higher than for a male head of household.

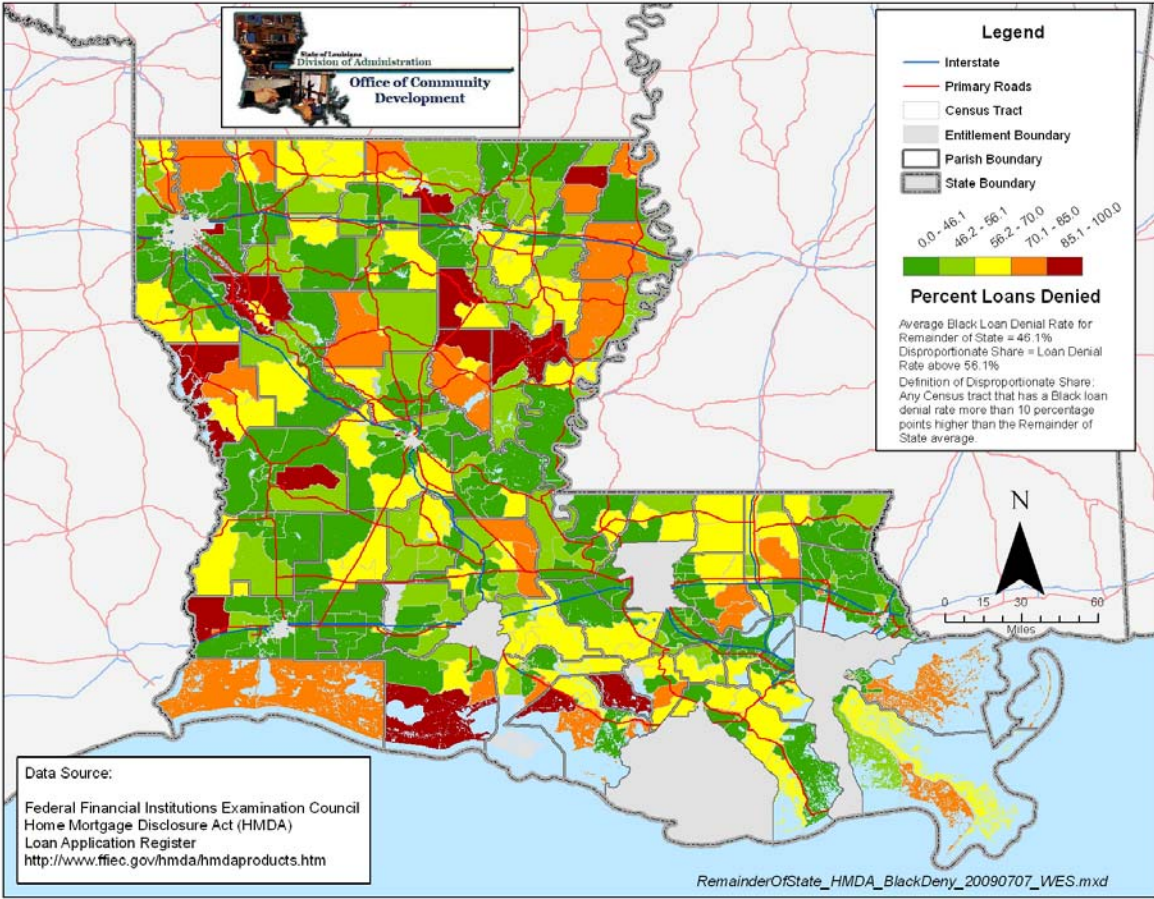
Year	Male	Female	Not Provided by Applicant	Not Applicable	Total
2002	27.3%	39.7%	56.8%	60.0%	33.5%
2003	25.6%	36.7%	45.7%	2.1%	29.4%
2004	25.9%	35.4%	47.5%	7.1%	29.2%
2005	26.2%	34.8%	39.6%	30.8%	29.1%
2006	25.7%	34.0%	38.9%	0.0%	28.5%
2007	26.3%	36.6%	43.8%	0.0%	29.7%
Total	26.1%	36.0%	47.4%	27.5%	29.8%

Denial rates were calculated by race and ethnicity of the loan applicants as well. Table 3.8 shows that denial rates were higher for racial and ethnic minority applicants as compared to white applicants. While whites had a denial rate of 24.8 percent, blacks and Hispanics had much higher denial rates of 46.1 and 32.0 percent, respectively.

Year	2002	2003	2004	2005	2006	2007	Total
American Indian or Alaskan Native	31.8%	35.8%	45.0%	37.7%	36.4%	38.8%	37.7%
Asian or Pacific Islander	14.4%	25.4%	19.5%	23.9%	21.3%	18.5%	20.5%
Black	52.7%	48.2%	45.7%	44.2%	42.5%	46.1%	46.1%
Hispanic (Race)	26.2%	24.9%	25.6%
White	26.1%	24.7%	24.5%	24.6%	24.0%	25.3%	24.8%
Other	17.4%	29.6%
Not Provided by Applicant	52.6%	41.4%	42.1%	42.3%	39.4%	38.2%	43.3%
Not Applicable	44.5%	3.8%	9.4%	30.8%	0.0%	0.0%	23.8%
Total	33.5%	29.4%	29.2%	29.1%	28.5%	29.7%	29.8%
Hispanic (Ethnicity)	.	.	33.5%	33.6%	29.1%	32.0%	32.0%

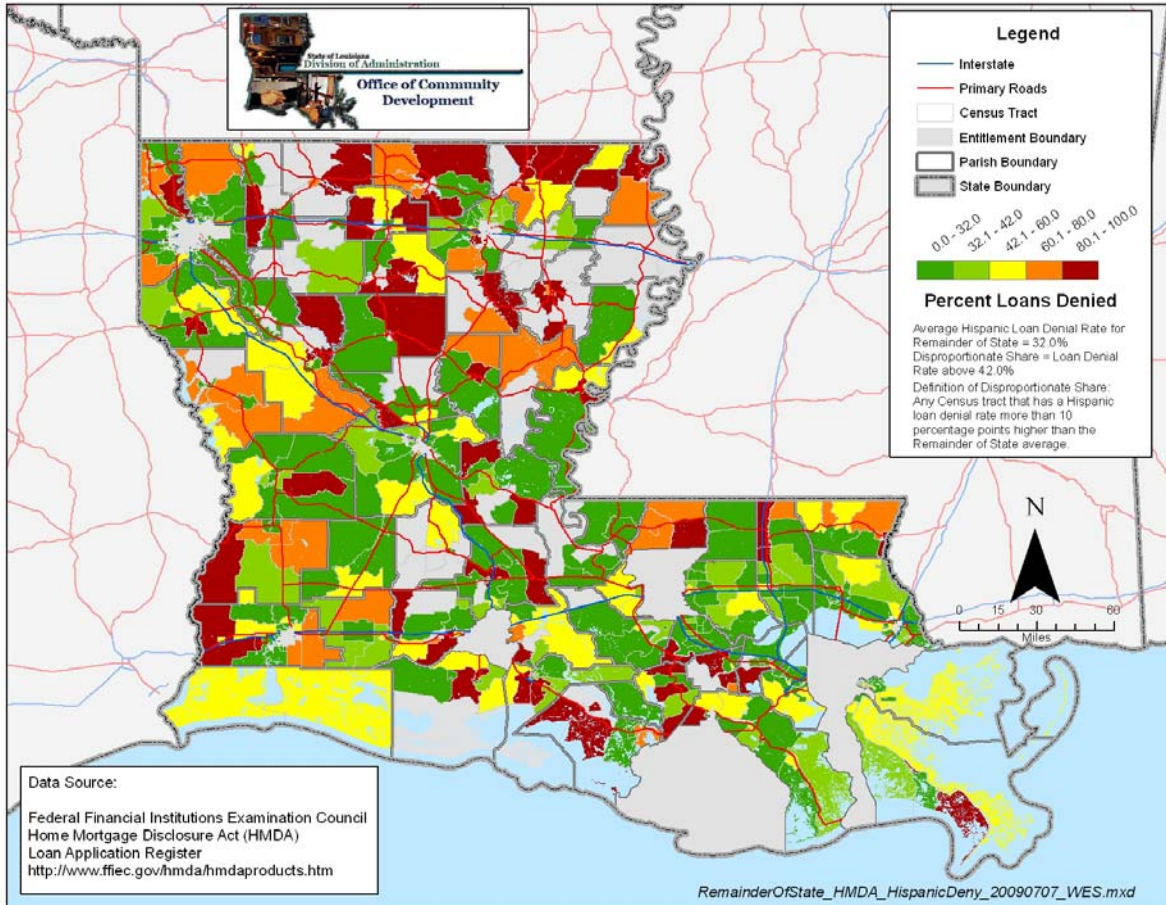
Map 3.2 presents the concentration of denial rates for black applicants. Several areas in the balance of the state showed a disproportionate share of loans denied to black applicants, with some areas exhibiting denial rates of over 85.0 percent.

Map 3.2
Denial Rate for Blacks
Balance of State
HMDA Data 2004 – 2007



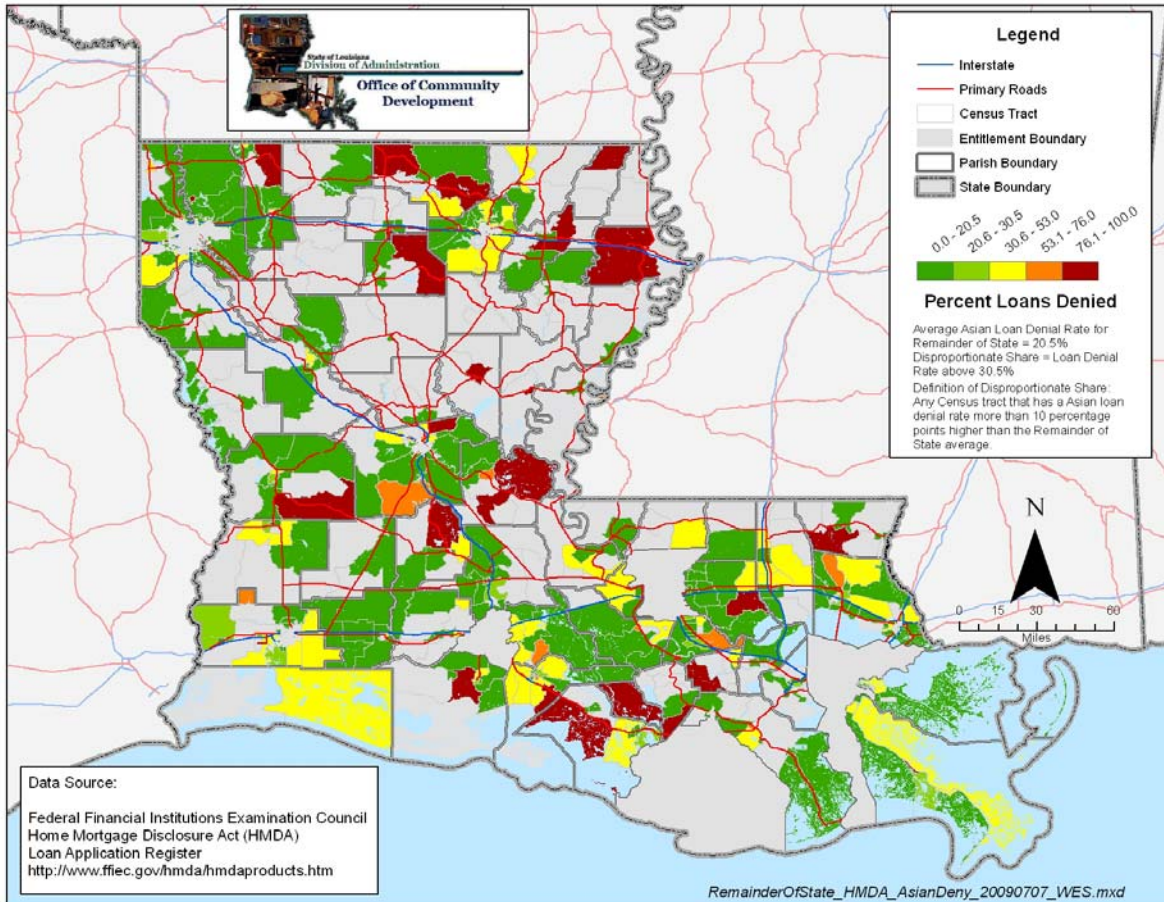
Map 3.3 shows the geographic distribution of loan applicant denial rates for Hispanic applicants in the balance of the state. As with the map for denial rates for black applicants, certain areas of disproportionately high denial rates were seen for Hispanic applicants, with some areas showing denial rates above 80.0 percent.

Map 3.3
Denial Rate for Hispanics
 Balance of State
 HMDA Data 2004 – 2007



Map 3.4 shows the geographic distribution of loan application denial rates for Asian applicants. Certain areas within the balance of the state exhibited disproportionately high denial rates for Asians, with some areas reaching denial rates above 76.0 percent.

Map 3.4
Denial Rate for Asians
 Balance of State
 HMDA Data 2004 – 2007



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

Table 3.7 presents the reason for denial of loan application by race and ethnicity. There are approximately seven regulatory agencies that oversee the lending process; not all lenders report data in exactly the same way and not all lenders report a reason for the loan denial. In comparing the portion of absent reasons for loan denial by race, whites showed a 31.6 percent rate of missing loan denial reason, blacks showed a 30.2 percent rate and Asians

showed a 27.0 percent rate. These figures do not suggest significant bias in regulatory reporting.

Table 3.7							
Owner-Occupied Home Purchase Loan Applications by Reason for Denial by Race							
Balance of State							
HMDA Data 2002 - 2007							
Denial Reason	American Indian or Alaskan Native	Asian or Pacific Islander	Black	White	Not Provided by Applicant	Total¹²	Hispanic (Ethnicity)
Debt-to-income Ratio	50	49	1,741	4,771	716	7,368	94
Employment History	3	20	202	855	83	1,173	17
Credit History	132	109	6,694	13,346	2,238	22,627	276
Collateral	16	18	495	2,181	447	3,171	50
Insufficient Cash	9	9	344	838	145	1,354	29
Unverifiable Information	10	14	325	734	152	1,246	31
Credit Application Incomplete	22	36	686	2,632	404	3,803	73
Mortgage Insurance Denied	0	0	10	26	4	40	2
Other	44	61	1,908	4,623	677	7,387	100
Missing	117	117	5,358	13,879	4,141	23,732	451
Total	403	433	17,763	43,885	9,007	71,901	1,123
% Missing	29.0%	27.0%	30.2%	31.6%	46.0%	33.0%	40.2%

Table 3.8 shows denial rates by income. As one might expect, households with lower incomes tended to have a higher rate of denial than households with higher incomes. In the balance of the state, households with incomes below \$15,000 had an average denial rate of 66.4 percent, while households with incomes of \$75,000 and above had an average denial rate of only 14.5 percent over the six year period.

Table 3.8							
Percent Denial Rates by Income by Year							
Balance of State							
HMDA Data 2002 - 2007							
Year	2002	2003	2004	2005	2006	2007	Total
<= \$15K	67.4%	63.8%	65.7%	68.9%	61.9%	71.9%	66.4%
\$15K - \$30K	51.5%	46.2%	46.4%	49.1%	49.0%	50.9%	48.8%
\$30K - \$45K	35.8%	30.8%	30.1%	31.6%	33.2%	34.1%	32.6%
\$45K - \$60K	25.0%	24.1%	23.6%	25.7%	26.2%	27.8%	25.5%
\$60K - \$75K	16.8%	15.5%	17.2%	18.8%	21.1%	22.8%	19.1%
Above \$75K	12.4%	11.2%	13.3%	13.9%	15.8%	17.0%	14.5%
Data Missing	21.6%	23.4%	40.0%	22.9%	25.4%	30.3%	27.3%
Total	33.5%	29.4%	29.2%	29.1%	28.5%	29.7%	29.8%

Table 3.9 presents denial rates segmented by both race or ethnicity and income. Even when correcting for income, minority racial and ethnic groups faced a much higher loan denial rate than whites. For example, blacks experienced much higher loan denial rates than whites at all income levels: at income levels below \$15,000 blacks showed denial rates of 75.2 percent compared to a 60.0 percent denial rate for whites, and at income levels above \$75,000 blacks showed a denial rate of 25.4 percent while whites showed a denial rate of only 12.3 percent.

¹² Total does not sum because the Hispanic (Race), Other, and Not Applicable categories were excluded from the above table.

Table 3.9								
Percent Denial Rates of Owner-Occupied Home Purchase Loans by Race by Income								
Balance of State								
HMDA Data 2002 - 2007								
Year	<= \$15K	\$15K - \$30K	\$30K - \$45K	\$45K - \$60K	\$60K - \$75K	Above \$75K	Data Missing	Total
American Indian or Alaskan Native	70.0%	52.5%	39.0%	35.8%	28.8%	21.9%	7.1%	37.7%
Asian or Pacific Islander	69.7%	36.3%	22.7%	18.2%	18.1%	12.9%	11.8%	20.5%
Black	75.2%	59.0%	44.3%	36.4%	30.4%	25.4%	43.3%	46.1%
White	60.0%	42.7%	28.2%	22.2%	16.4%	12.3%	19.9%	24.8%
Not Provided by Applicant	71.3%	66.1%	47.4%	38.1%	29.2%	23.3%	56.8%	43.3%
Not Applicable	83.3%	62.3%	40.0%	11.6%	4.8%	5.3%	3.7%	23.8%
Total	66.4%	48.8%	32.6%	25.5%	19.1%	14.5%	27.3%	29.8%
Hispanic (Ethnicity)	69.9%	55.1%	32.2%	27.6%	27.7%	19.1%	22.5%	32.0%

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

1. If they are HOEPA loans;
2. Lien status, such as whether secured by a first lien, a subordinate lien, not secured by a lien, or not applicable (purchased loans); and
3. Presence of high annual percentage rate loans (HALs), defined as more than three percentage points for home purchases when contrasted with comparable treasury instruments, or five percentage points for refinance loans.

Originated owner-occupied home purchase loans qualifying as HALs were identified for 2004 through 2007. These high-interest loans are considered predatory in nature. Table 3.10 shows the total number of originated loans and originated loans that were HALs. As seen therein, there were 34,013 home purchase loans, 7,914 home improvement loans and 39,377 refinance loans in this time period that had these high-interest rate characteristics. In total, 28.4 percent of all originated owner-occupied home purchase loans were considered HALs.

Table 3.10						
Originated Owner-Occupied Loans by Year Loan Purpose by HAL Status						
Balance of State						
HMDA 2004 - 2007						
Loan Purpose		2004	2005	2006	2007	Total
Home Purchase	Other Originated	20,439	22,084	22,978	20,404	85,905
	High APR Loan	6,459	9,877	10,578	7,099	34,013
	Percent High APR	24.0%	30.9%	31.5%	25.8%	28.4%
Home Improvement	Other Originated	6,097	6,143	6,503	6,950	25,693
	High APR Loan	1,907	1,894	1,961	2,152	7,914
	Percent High APR	23.8%	23.6%	23.2%	23.6%	23.5%
Refinancing	Other Originated	23,990	18,000	15,935	17,068	74,993
	High APR Loan	10,338	10,174	9,966	8,899	39,377
	Percent High APR	30.1%	36.1%	38.5%	34.3%	34.4%
Total	Other Originated	50,526	46,227	45,416	44,422	186,591
	High APR Loan	18,704	21,945	22,505	18,150	81,304
	Percent High APR	27.0%	32.2%	33.1%	29.0%	30.3%

As shown in Table 3.11, of the 34,013 home purchase HALs originated during this time period, 23,888 were originated to white applicants and 7,104 were originated to black applicants.

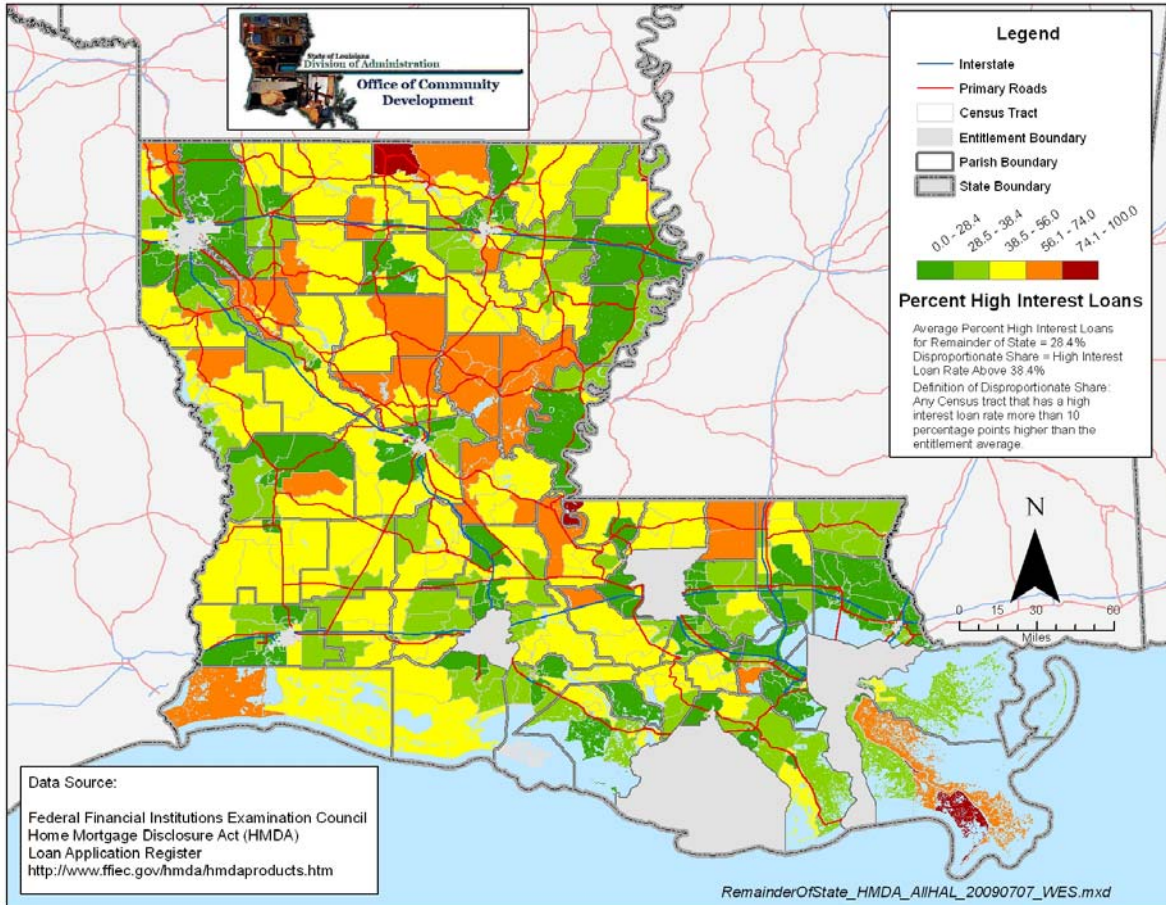
Table 3.11					
Owner-Occupied Home Purchase HALs Originated by Race					
Balance of State					
HMDA Data 2004 - 2007					
Race	2004	2005	2006	2007	Total
American Indian	39	58	43	36	176
Asian	72	80	78	76	306
Black	1,336	2,153	2,255	1,360	7,104
White	4,653	6,920	7,172	5,143	23,888
Not Provided by Applicant	350	664	1,029	481	2,524
Not Applicable	9	2	1	3	15
Total	6,459	9,877	10,578	7,099	34,013
Hispanic	125	199	219	125	668

Table 3.12 shows the percent of HALs originated by race. While whites had 25.2 percent of owner-occupied loans as HALs, blacks had more than double these rates at 45.7 percent. This finding suggests that blacks tended to possess a higher share of loans with high interest rate characteristics and, hence, bore a larger burden of foreclosure risk.

Table 3.12					
Percent of HAL Owner-Occupied Home Purchase Loans Originated by Race					
Balance of State					
HMDA Data 2004 - 2007					
Race	2004	2005	2006	2007	Total
American Indian	37.5%	42.3%	43.9%	34.6%	39.7%
Asian	23.8%	25.9%	25.1%	23.3%	24.5%
Black or African American	39.6%	52.7%	49.8%	38.2%	45.7%
White	21.7%	27.1%	27.6%	23.8%	25.2%
Not Provided by Applicant	22.1%	35.7%	38.8%	26.0%	31.8%
Not Applicable	11.7%	22.2%	12.5%	25.0%	14.2%
Total	24.0%	30.9%	31.5%	25.8%	28.4%
Hispanic	22.2%	31.3%	33.7%	23.4%	28.0%

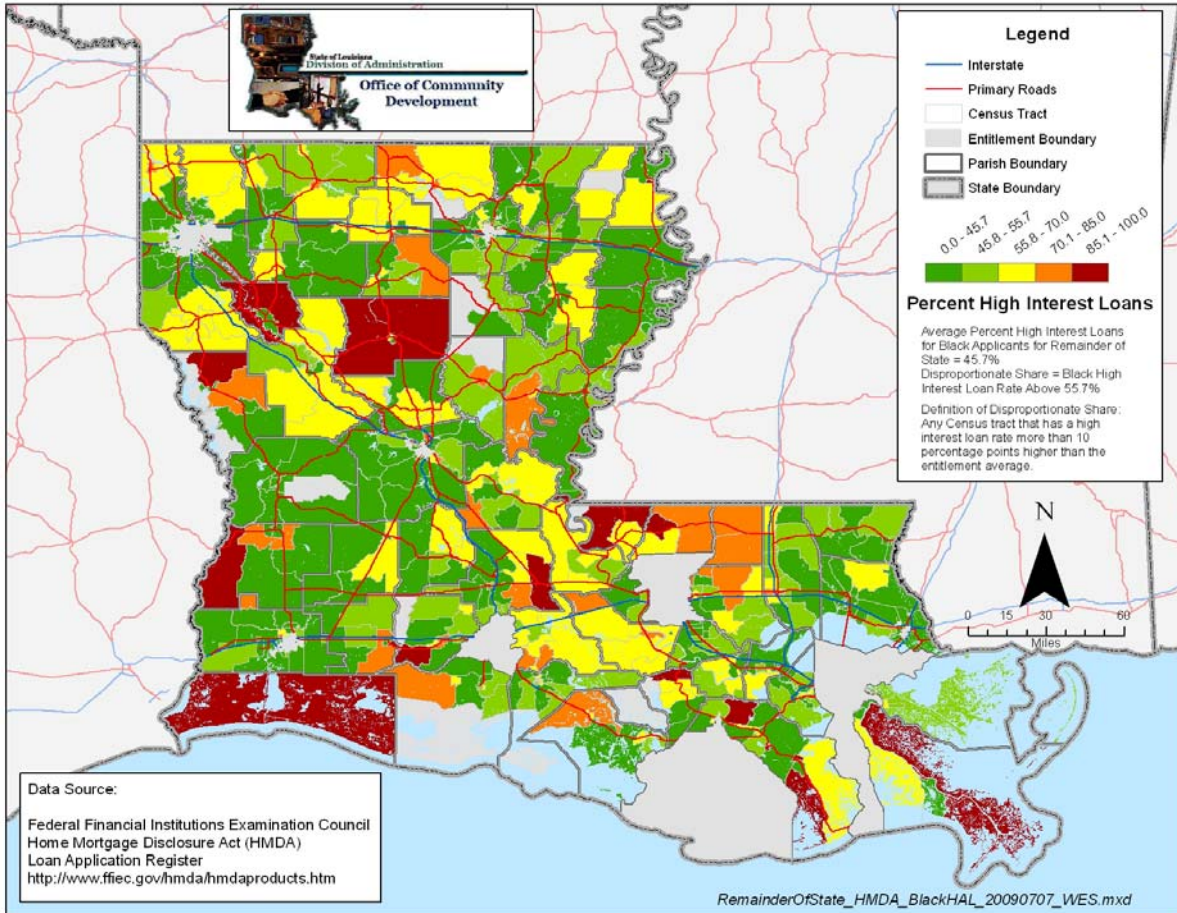
Map 3.5 illustrates the geographic distribution of the percent of total HALs originated. This map shows that HALs were not distributed evenly throughout the balance of the state. Within some areas, more than 74.0 percent of all originated home purchase loans were HALs.

Map 3.5
Percent of Total High Annual Percentage Rate Loans Originated
 Balance of State
 HMDA Data 2004-2007



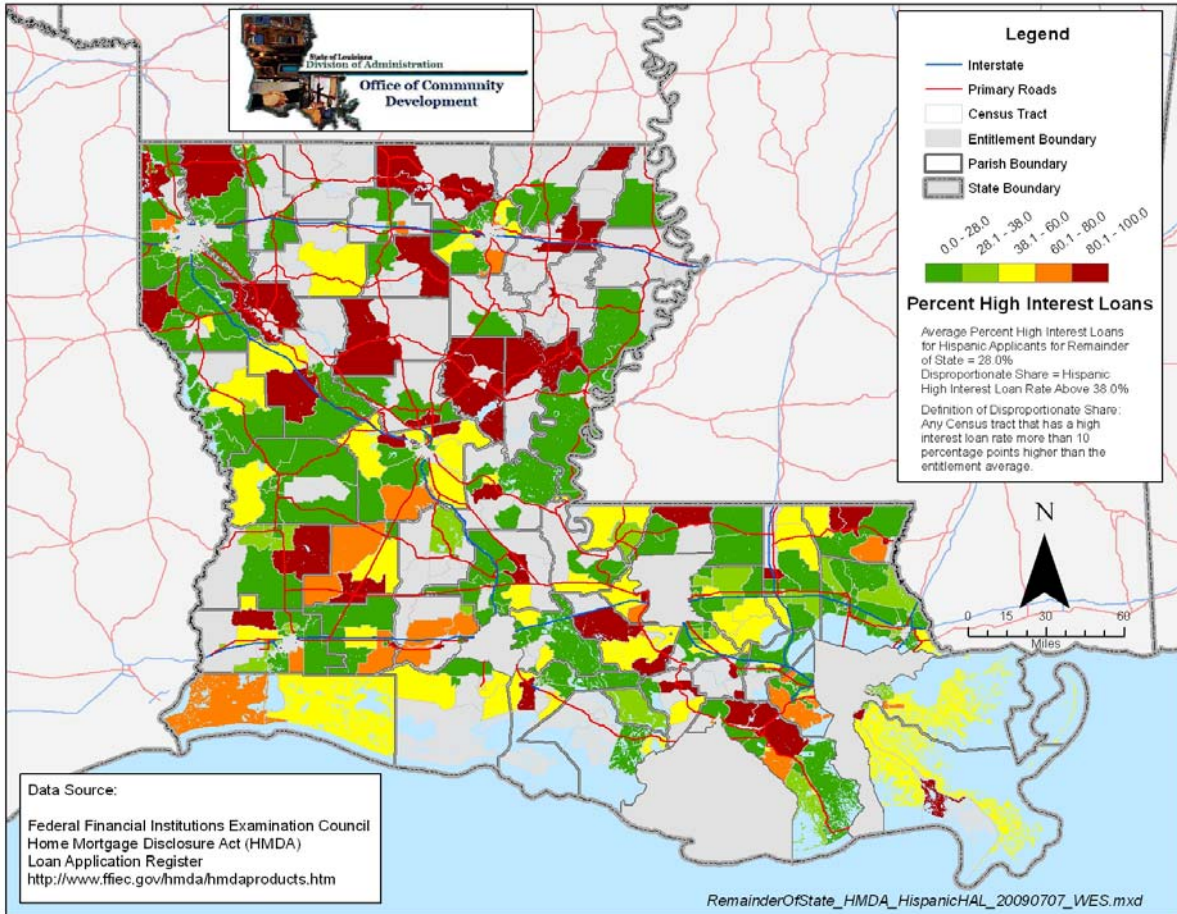
Map 3.6 presents the geographic distribution of high interest rate loans originated to black applicants and shows that some areas of the non-entitlement areas of the state had more than 85.0 percent of all loans originated as HALs.

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



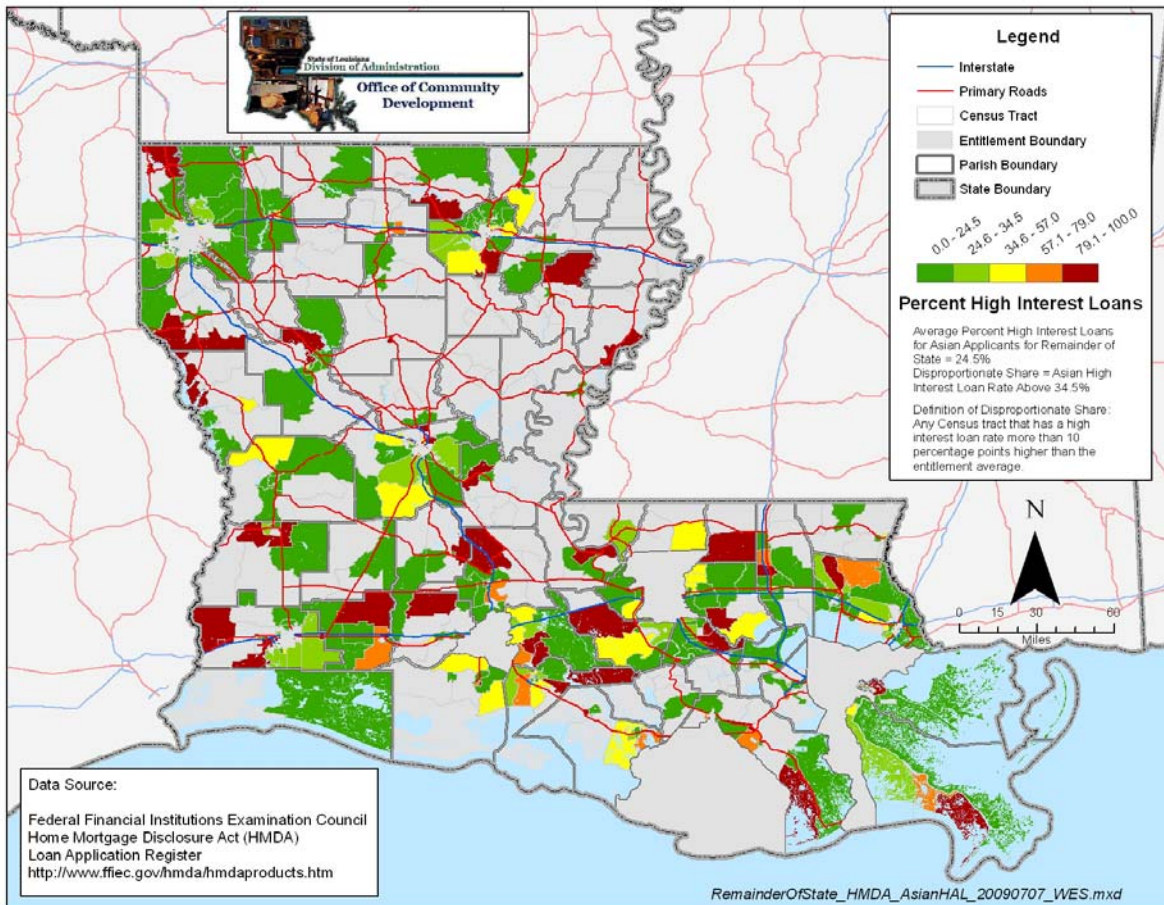
Map 3.7 shows the distribution of HALs originated to Hispanic applicants. The balance of state saw areas where more than 80.0 of all loans originated to Hispanic applicants as high interest rate loans.

Map 3.7
Percent of Total High Annual Percentage Rate Loans Originated to Hispanic Applicants
 Balance of State
 HMDA Data 2004-2007



Map 3.8 presents the geographic distribution of HALs originated to Asian applicants. HALs issued to Asians were not spread uniformly throughout the balance of the state, but were disproportionately concentrated in a few areas of the balance of the state, with some areas seeing HALs comprising above 79.0 percent of all originated owner-occupied loans.

Map 3.8
Percent of Total High Annual Percentage Rate Loans Originated to Asian Applicants
 Balance of State
 HMDA Data 2004-2007



SUMMARY

LENDING ACTIVITY

Several federal laws affect lending practices, such as the Fair Housing Act, the Equal Credit Opportunity Act, the Community Reinvestment Act and the Home Mortgage Disclosure Act (HMDA). HMDA data are the most inclusive lending data available and were used to analyze lending practices in the balance of the state. HMDA data for the balance of the state from 2002 to 2007 showed 1,086,076 loan applications were processed for home purchases, home improvements and refinancing, with 372,025 loan applications for owner-occupied home purchases.

DENIAL RATES

In regard to these 372,025 owner-occupied home purchase applications, excluding loan applications that were withdrawn by the applicant, incomplete or accepted by the prospective lender but not exercised by the applicant, there were 169,199 loan originations and 71,901 loan denials for an average loan denial rate of 29.8 percent. The most common reasons for denial of an owner-occupied loan applicant was credit history and debt-to-income ratio. Denial rates were not even; whites had a denial rate of 24.8 percent, while blacks and Hispanics had higher denial rates of 46.1 and 32.0 percent, respectively.

Higher rates of denial for racial and ethnic minorities, regardless of income, were also measured. Blacks experienced much higher loan denial rates than whites at all income levels. White applicants with incomes below \$15,000 dollars were denied 60.0 percent of the time, while black applicants in the same income range were denied 75.2 percent of the time. This was also true for applicants with incomes above \$75,000, wherein whites had a denial rate of 12.3 percent and blacks had a denial rate of 25.4 percent. These higher denial rates were also observed in specific areas of the state.

HIGH ANNUAL PERCENTAGE RATE LOANS

HMDA data report loan originations with unusually high annual percentage rate loans, or HALs, which are loans that may be considered predatory in nature. While whites had 25.2 percent of owner-occupied loans as HALs, blacks had more than double this rate at 45.7 percent. Hispanics had a moderate rate of HALs at 28.0 percent. These minority groups tended to carry a disproportionately higher share of foreclosure risk due to such high numbers of home purchase HALs.

SECTION IV. FAIR HOUSING AGENCIES AND PROGRAMS

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

MAJOR FAIR HOUSING ORGANIZATIONS

THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

The United States Department of Housing and Urban Development (HUD) oversees, administers and enforces the Fair Housing Act. HUD has ten regional offices throughout the U.S., and HUD's regional office in Ft. Worth, Texas oversees housing, community development and fair housing enforcement in Louisiana, as well as in Arkansas, New Mexico, Oklahoma, and Texas, with field offices in Louisiana in New Orleans and Shreveport.¹³ The Office of Fair Housing and Equal Opportunity (FHEO) within HUD's Ft. Worth office enforces the federal Fair Housing Act and other civil rights laws that prohibit discrimination in housing, mortgage lending and other related transactions against the following protected classes: race, sex, religion, familial status, disability, national origin and color. HUD also provides education and outreach, monitors agencies that receive HUD funding for compliance with civil rights laws, and works with state and local agencies under the Fair Housing Assistance Program and Fair Housing Initiative Program.

FAIR HOUSING ASSISTANCE PROGRAM

In the U.S., many agencies receive funding directly from HUD as Fair Housing Assistance Programs (FHAPs). FHAPs require an ordinance or law that empowers a local governmental agency to enforce local fair housing laws; if HUD determines that the local entity can operate on a "substantially equivalent" level to federal agency enforcement activities, HUD contracts with that agency to process fair housing complaints and reimburses the jurisdiction on a per case basis.¹⁴ FHAP grants are given to public, not private, entities and are given on a noncompetitive, annual basis to substantially equivalent state and local fair housing enforcement agencies.

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

¹³ <http://www.hud.gov/offices/fheo/aboutfheo/fhhubs.cfm#hdcent>

¹⁴ <http://www.hud.gov/offices/fheo/progdsc/title8.cfm>

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

FAIR HOUSING INITIATIVE PROGRAM

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

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

Grantee eligibility:

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

Eligible activities:

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

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

Grantee eligibility:

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

Eligible activities:

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

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

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

Grantee eligibility:

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

Eligible activities:

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

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

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

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

Education and Outreach Initiative - Fair Housing Awareness Component

Award Amount: \$100,000

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

Advocacy Center

Education and Outreach Initiative - Disability Component

Award Amount: \$100,000

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

Greater New Orleans Fair Housing Action Center
Private Enforcement Initiative - General Component

Award Amount: \$275,000

The Greater New Orleans Fair Housing Action Center (GNOFHAC) is a full service, private fair housing organization that will provide enforcement services and conduct systemic investigation in the New Orleans area. GNOFHAC will receive, investigate, mediate, and refer housing discrimination complaints. GNOFHAC will also recruit and train testers to conduct testing of the housing, lending, and insurance markets.¹⁵

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

Greater New Orleans Fair Housing Action Center
Private Enforcement Initiative – General Component

Award Amount: \$275,000

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

New Orleans Advocacy Center
Education and Outreach Initiative – General Component

Award Amount: \$100,000

The Advocacy Center will educate disabled Louisiana residents displaced by Hurricanes Katrina and Rita about their fair housing rights and what to do if they believe their rights have been violated. The Center will also inform housing providers about their responsibilities under the Fair Housing Act and how it makes good business sense to comply with fair housing laws. Specific education and outreach activities will be conducted in parishes hit hard by the storms, including Orleans, St. Bernard, Plaquemines, Jefferson, St. Tammany, Calcasieu, Cameron, Lafourche, Terrebonne, Vermilion, and St. May Louisiana.¹⁶

¹⁵ <http://www.hud.gov/offices/fheo/partners/FHIP/fhip.cfm>

¹⁶ <http://www.hud.gov/news/releases/pr07-148.pdf>

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

Greater New Orleans Fair Housing Action Center
Private Enforcement Initiative General
Component Award Amount - \$275,000

Greater New Orleans Fair Housing Action Center (FHAC) will continue its services to all individuals and families in the New Orleans MSA. FHAC proposes to utilize funding to conduct intake of new complaints alleging violations of federal and state fair housing laws; analyze complaints to determine appropriate investigative technique and/or referral; ensure appropriate investigations of housing discrimination by conducting paired rental/sales/insurance and lending tests; and conduct recruitment and training of new testers. FHAC will also conduct enforcement projects to assist in determining the nature/extent of discrimination against underserved populations. FHAC will conduct education and outreach activities and provide training to local governments, housing consumers, and housing providers.¹⁷

LOCAL FAIR HOUSING ORGANIZATIONS

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

LOUISIANA DEPARTMENT OF JUSTICE, PUBLIC PROTECTION DIVISION

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

GREATER NEW ORLEANS FAIR HOUSING ACTION CENTER

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

¹⁷ <http://www.hud.gov/offices/ftheo/partners/FHIP/FY2008FHIP.cfm#mn>

COMPLAINT AND COMPLIANCE REVIEW

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

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

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

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

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

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

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

The case is closed if mediation of the two parties is achieved or if the investigator determines that there was no reasonable cause of discrimination. If reasonable cause is

found and mediation fails, then either a federal judge or a HUD Administrative Law Judge hears the case and determines damages, if any.¹⁸ A respondent may be ordered to:

- Compensate for actual damages, including humiliation, pain and suffering.
- Provide injunctive or other equitable relief, for example, to make the housing available.
- Pay the Federal Government a civil penalty to vindicate the public interest. The maximum penalties are \$10,000 for a first violation and \$50,000 for a third violation within seven years.
- Pay reasonable attorney's fees and costs.¹⁹

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

Section 504 Complaints

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

Complaints that are in violation of Section 504 are filed and processed in the same manner as general fair housing complaints.²⁰

COMPLAINT PROCESS FOR THE LOUISIANA DEPARTMENT OF JUSTICE

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

¹⁸ <http://www.hud.gov/offices/fheo/complaint-process.cfm>

¹⁹ <http://www.hud.gov/offices/fheo/FHLaws/yourrights.cfm>

²⁰ <http://www.hud.gov/offices/fheo/disabilities/sect504faq.cfm>

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

After the complaint form is submitted, the complainant is sent a letter verifying that the complaint was received and that investigation will occur. The complainant is asked to submit all information regarding the incident that supports the case of discrimination. At that time, the respondent is also notified that a complaint has been filed against them and is given the opportunity to submit information supporting the claim that no discrimination occurred. Next, interviews are conducted with each party. Mediation can be attempted within ten days of filing a complaint, but only if agreement is reached to mediate by both parties. If the matter cannot be resolved through mediation or conciliation, then a determination is made by the Louisiana Attorney General's Office. If evidence supports discrimination, a lawsuit is filed in state court on behalf of the complainant by the Attorney General's Office. However, the complainant may also choose to file the complaint with a private attorney in state court within two years of the incident. If discrimination is not supported by the investigation, then the complaint is dismissed.²¹

SUMMARY

FAIR HOUSING AGENCIES AND ORGANIZATIONS

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

²¹ <http://www.ag.louisiana.gov/Shared/ViewDoc.aspx?Type=3&Doc=236>

SECTION V. EVALUATION OF THE FAIR HOUSING PROFILE

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

FAIR HOUSING STUDIES AND CASES

RELATED NATIONAL FAIR HOUSING STUDIES

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

In April 2002, HUD released, “How Much Do We Know?,” a national study which assessed public awareness of and support for fair housing law. The study found that only one-half of the general public was able to identify six or more of eight scenarios describing illegal conduct. In addition, 14 percent of the nationwide survey’s adult participants believed that they had experienced some form of housing discrimination in their lifetime. However, only 17 percent of those who had experienced housing discrimination had done something about it. Last, two-thirds of all respondents said that they would vote for a fair housing law.²²

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

²² http://www.huduser.org/Publications_

positive finding of the survey was that public support for fair housing laws increased from 66 percent in 2000 to 73 percent in 2005.²³

In 2004, the U.S. General Accounting Office's (GAO) released "Fair Housing: Opportunities to Improve HUD's Oversight and Management of the Enforcement Process." The GAO report found that, although the process had improved in recent years, between 1996 and 2003 the median number of days required to complete fair housing complaint investigations was 259 for HUD's Fair Housing and Equal Opportunity Offices and 195 for FHAP agencies. The report did find a higher percentage of investigations completed within the FHA's 100-day mandate.²⁴ The GAO report also identified the following trends between 1996 and 2003:

- The number of fair housing complaints filed each year steadily increased since 1998. An increasing proportion of grievances alleged discrimination based on disability, and a declining proportion alleged discrimination based on race, though race was still the most cited basis of housing discrimination over the period.
- FHAP agencies conducted more fair housing investigations than FHEO agencies over the eight-year period. The total number of investigations completed each year increased somewhat after declining in 1997 and 1998.
- Investigation outcomes changed during this time, with an increasing percentage closed without a finding of reasonable cause to believe discrimination occurred. A declining percentage of investigations were resolved by the parties themselves or with help from FHEO or FHAP agencies.

In January 2005, the Center for Community Capital at the University of North Carolina at Chapel Hill reported that the following three predatory loan terms increase the risk of mortgage foreclosure in subprime home loans: prepayment penalties, balloon payments and adjustable rates. The study examined recent home mortgages while controlling for credit scores, loan terms and varying economic conditions.²⁵ For example, in the prime lending market only two percent of home loans carry prepayment penalties of any length. Conversely, up to 80 percent of all subprime mortgages carry a prepayment penalty, a fee for paying off a loan early. An abusive prepayment penalty extends more than three years and/or costs more than six months' interest.²⁶ While previous studies have linked subprime lending with home loss, this study was the first to identify specific abusive terms that lead to foreclosure.

In May 2005, HUD published "Discrimination against Persons with Disabilities: Barriers at Every Step." The study documented findings about rental discrimination toward two groups in the Chicago Metropolitan Area: deaf individuals using a telephone relay service and persons in wheelchairs. The research resulted in three significant findings: landlords refused to speak to one in four of the deaf callers, both groups received less encouragement than able individuals, and most landlords agreed to any reasonable accommodation and modifications requests.²⁷

²³ *Do We Know More Now?* United States Department of Housing and Urban Development, Office of Policy Development and Research, 2006. Document available at <http://www.huduser.org/Publications>.

²⁴ *Fair Housing: Opportunities to Improve HUD's Oversight and Management of the Enforcement Process*, United States General Accounting Office, Report to Congressional Requesters, April 2004.

²⁵ <http://www.kenan-flagler.unc.edu/assets/documents/foreclosurerelease.pdf>

²⁶ <http://www.responsiblelending.org/pdfs/2b003-mortgage2005.pdf>

²⁷ <http://www.huduser.org/publications/hsgspec/dds.html>.

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

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

A study released in April 2009, entitled “Segregation and the Subprime Lending Crisis,” presents research on the relationship between residential segregation and subprime lending, specifically whether geographic areas with increased levels of residential segregation have a disproportionate share of subprime loans. The study concluded that, when controlling for other socio-economic factors traditionally attributed to the prevalence of high risk loans, racial segregation proved to be a strong determinant of high cost loans, with segregation of black populations having a stronger effect than segregation for Hispanic populations.²⁸

RELATED NATIONAL FAIR HOUSING CASES

In a landmark fraud case, Westchester County, New York, was ordered to pay more than \$50 million dollars to resolve allegations of misusing federal funds for public housing projects and falsely furthering fair housing. The lawsuit, which was filed in 2007 by an anti-discrimination center, alleged that the county failed to reduce racial segregation of public housing projects in larger cities within the county and to provide affordable housing options in its suburbs. The county had accepted more than \$50 million from HUD between 2000 and 2006 with promises of addressing these problems. In a summary judgment in February 2009, a judge ruled that the county did not properly factor in race as an impediment to fair housing and that the county did not accurately represent its efforts of integration in its analysis of impediments. In the settlement, Westchester County will be forced to pay more than \$30 million to the federal government, with roughly \$20 million eligible to return to the county to aid in public housing projects. The County must also set aside \$20 million to build public housing units in suburbs and areas with mostly white populations. The ramifications of this case are expected to affect housing policies of entitlement communities across the nation, which will likely be held to higher levels of scrutiny to ensure that federal funds are being spent in the best interest of protected classes.

RELATED STATEWIDE FAIR HOUSING STUDIES

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

²⁸ Squires, Gregory D., Derek S, Hyra and Robert N. Renner. “Segregation and the Subprime Lending Crisis.” April, 2009.

on discrimination against displaced Louisiana residents. The study found that 66 percent of African American evacuees faced some form of housing discrimination following the storm. The most frequent types of discrimination encountered concerned receiving accurate information about the terms and conditions of rentals and the availability of rental units. White testers were repeatedly told apartments were available and given correct information on the terms and conditions for securing an apartment, while blacks were often told no apartments were available or were quoted higher rent prices or larger security deposits.²⁹

In 2006, the NAACP issued a report detailing the state of housing one year after Hurricane Katrina and offered policy recommendation focused on the equitable rebuilding of the hurricane damaged region. The research showed the natural disaster of Katrina exacerbated existing man-made problems of fair and affordable housing. The evidence showed blacks experienced housing discrimination when attempting to secure alternate housing. The acute residential segregation in New Orleans contributed to the disproportionate impact of the storm on minority communities with 80 percent of the most flooded areas consisting of nonwhite residents. Also, the policies put in place one year after the storm had the potential to re-establish the segregation that existed prior to the storm thereby limiting the opportunities for personal growth and development available to the African American community.³⁰

A housing discrimination study conducted over the period of 2004 to 2006 evaluated changes in discriminatory behavior in pre- and post-Katrina housing markets. The study argued housing discrimination can occur in preliminary phone interactions, based on the caller's accent, command of the English language or other verbal cues that reveal the potential race of the applicant. After conducting 504 calls to 168 rental agents during the 2004 through 2006 period, it was found that the likelihood of a Latino encountering some form of discrimination not only depended upon the ethnic or linguistic cues from verbal interaction, but also from the current condition of the housing market. Unlike other fair housing studies, it was rare for agents to give differing information between White and Latino callers, however it was common that terms and conditions regarding available units differed by race. When statistical analysis was applied to the data, race was found to be a statistically significant factor in determining specific terms and conditions. Furthermore, the specific discriminatory action varied as housing market conditions varied. The study found discriminatory behavior existed before and after Hurricane Katrina, but the methods of discrimination changed as a result of changes in the housing market.³¹

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

²⁹ <http://www.nationalfairhousing.org/LinkClick.aspx?fileticket=dhpik3cZYgc%3D&tabid=2555&mid=5418>

³⁰ http://4909e99d35cada63e7f757471b7243be73e53e14.gripelements.com/publications/Housing_in_NOLA_KI_OppAg_NAACP.pdf

³¹ http://www.allacademic.com/meta/p_mla_apa_research_citation/1/8/4/6/9/p184698_index.html

Recommendations to increase the availability of affordable housing and decrease the hardships minorities undergo when securing housing were presented.³²

In 2007, the American Civil Liberties Union issued a report detailing the situation two years after Katrina ravaged Louisiana and Mississippi's coastal areas. The report outlined the many instances of racial injustice, from police abuse to inadequate medical care to the racial basis of official reconstruction policies. The report also detailed the existence of housing discrimination in Louisiana and Mississippi by citing specific examples and highlighting policy trends that were aimed at enforcing racial segregation.³³

In 2007, the Greater New Orleans Fair Housing Actions Center conducted a fair housing study, to uncover possible housing discrimination in Jefferson, St. Tammany, Orleans and St. Bernard Parishes. The study, entitled "For Rent, Unless You're Black," utilized paired testers, who were grouped together based on income, career path, family type and rental histories. The only characteristic varying between the testers was race. Forty housing providers were tested for racial discrimination, of which 57.5 percent were found to engage in some form of housing discrimination. Types of discrimination included differences in accessing appointments to view units, differences in information regarding availability of units, differences in access to applications and differences in terms and conditions. The study recommended fair housing be a primary component in the rebuilding process, funding for fair housing enforcement be increased, business owners and developers be involved to combat discrimination, and private fair housing initiatives be expanded within the state of Louisiana.³⁴

The Urban Institute was commissioned in 2007 by the Louisiana Family Recovery Corps to draft a report that would recommend promising programs and practices that would expand the affordable rental housing market. While this report focused on the broader issues of affordable housing, it also highlighted the adverse effects racial discrimination imposes on the affordable rental market. Fair housing issues were cited as a primary barrier to maximizing the potential of housing vouchers in the post-Katrina affordable housing rental market. The study also noted that the Housing Choice Voucher program results in lower housing cost burdens, better housing conditions and better neighborhood environments, however residents who receive vouchers are often unable to find qualifying houses and discrimination keeps voucher recipients from moving to communities of opportunity. The report recommended vigorous fair housing enforcement, as displaced families have encountered discrimination when attempting to secure housing. The authors noted that not only would more enforcement decrease discrimination against individuals in a protected class, it would also increase the effectiveness of housing vouchers, enabling lower income minorities to find secure affordable housing.³⁵

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

³² <http://www.centerforsocialinclusion.org/PDF/racetorebuild.pdf>.

³³ http://www.aclu.org/files/pdfs/prison/brokenpromises_20070820.pdf

³⁴ <http://www.gnofairhousing.org/pdfs/GNOFHAC%202007%20Rental%20Audit.pdf>

³⁵ http://www.urban.org/UploadedPDF/411514_affordable_rental_housing.pdf

Americans by the federal government's reconstruction policies. The U.S. Department of Housing and Urban Development contracted with private developers to demolish 70 percent of public housing, residents of which are nearly all black. The report claimed many public housing units suffered little or no damage from the hurricane. The approved redevelopment plans included building a golf course and market rated housing units. As a result, the number of low-income apartments fell from 896 to 276 units in the Lafitte housing development, from 1,436 to 160 units in the St. Bernard housing development, from 1,550 to 154 units in the B.W. Cooper housing development and from 723 to 154 units in the C.J. Peete housing development. This situation created a housing crisis for approximately 5,000 black families.³⁶

Policy Link issued a report in 2008 which reviewed the housing recovery process made by the state of Louisiana and evaluated the progress of major federally-funded recovery initiatives, such as the Large and Small Rental Repair programs and the homeowners Road Home program. The report highlighted the large scale displacement of many residents and the inadequate funds offered to rebuild the housing stock within New Orleans. While the majority of Road Home applicants received on average of \$35,000 less than the amount required to fix their home, 60 percent of the applicants in the predominately African American neighborhoods of New Orleans East and the Lower 9th Ward had gaps over \$40,000. The report also highlighted the plight of renters. In hurricane affected areas, only two in five affordable damaged rental units were repaired or replaced with government assistance funds. In New Orleans, around one in three received recovery assistance. Of the 24,600 rental homes that received assistance, only 2,600 were available for occupancy. Because a large majority of African-Americans were renters, this placed a disproportionate share of the rental housing crisis on the African-American population.³⁷

In 2008, the National Commission on Fair Housing issued its report on the current state of fair housing throughout the country and in regions affected by Hurricane Katrina. Through sworn testimony, the commission reported the failure to bring fair housing cases arising out of the aftermath of the catastrophe, citing discrimination to those seeking to relocate, discrimination on Internet sites offering housing for hurricane victims and discriminatory opposition to desperately needed affordable housing projects. The commission also identified specific cases of discrimination within a number of Louisiana's communities. For example, St. Bernard parish made it illegal for an owner of a single-family home, of which 93 percent are white, to rent to anyone not a blood relative. Also, Jefferson Parish passed a resolution prohibiting Low Income Tax Credit Housing within its borders, limiting the availability of affordable housing in the area, thus discouraging the immigration of residents from the adjacent Lower Ninth Ward, who are predominantly black. Additionally, Kenner City, which sits within Jefferson Parish, took similar measures and imposed a moratorium on the construction of multi-family housing seeking to stop the development of affordable housing designed to alleviate the housing needs of minority populations.³⁸

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

³⁶ <http://www.ehumanrights.org/docs/Katrina%20CERD%20Shadow%20Report.pdf>

³⁷ <http://www.csworkshop.org/katrinareader/files/equityatlas.pdf>

³⁸ http://www.nationalfairhousing.org/Portals/33/reports/Future_of_Fair_Housing.PDF

Orleans Fair Housing Action Center, housing complaints from 2005 to 2008 greatly increased after the storms. For example, the Center noted that after the storms in 2005, more renters complained of rental housing advertised on the internet that discriminated against certain races or religions.³⁹

In 2009, the Greater New Orleans Fair Housing Action Center released findings from an audit which showed that housing being built in the New Orleans area often failed to meet modification standards for persons with disabilities. Despite the fact that the Federal Housing Act requires apartment complexes with more than four units to properly modify a certain number of units for persons with disabilities, the Center found that of 19 apartment units constructed since Hurricane Katrina most lacked proper modifications, including tub or shower adaptation, widened doorways, and light and power switch access. The authors of the report noted that many times disability discrimination of this type is not reported because it does not directly affect or hurt an individual. However, the report indicated that this type of discrimination does indeed hinder those with disabilities from having freedom of housing choice, particularly in metropolitan areas.⁴⁰

RELATED STATEWIDE FAIR HOUSING CASES

In 2005, a case of racial discrimination in the rental market was settled. The case involved a white woman and her black husband who sought an apartment in Metairie and were told by a landlord that he only rented units to single, white persons. The complaint was filed with the Greater New Orleans Fair Housing Action Council and then investigated by the same organization. Through testing activities, it was found that the landlord participated in patterns of discrimination based on gender, race and national origin. The landlord was fined \$9,000 and was required to adopt non-discriminatory practices in future leasing policies.⁴¹

A lawsuit was filed against the city of Denham Springs in 2005 in response to the city's refusal to allow persons with mental disabilities to utilize a group home building in the city. The lawsuit was filed on behalf of Options Foundation, Inc., an organization that planned to utilize a building, formerly a halfway house, to house persons with mental disabilities. The lawsuit alleged that the city was acting against the guidelines of the Fair Housing Act when it prevented mentally disabled persons who had been displaced by Hurricane Katrina from living in the building. Options, Inc, was granted a restraining order against the City as a result of this suit.⁴²

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

³⁹ <http://www.2theadvocate.com/news/36281719.html>

⁴⁰ <http://www.nola.com/news/t-p/neworleans/index.ssf?base/news-10/1242969648315340.xml&coll=1>

⁴¹ <http://gnofairhousing.org/pdfs/04-11-05-pressrelease-Spiller.pdf>

⁴² http://gnofairhousing.org/pdfs/12-13-05-Press_release_Denham_Springs%20Suit.pdf

that encourage non-discriminatory advertising for housing, including filtering future advertisements to prevent discriminatory postings from being published.⁴³

A lawsuit was filed in 2006 against the Housing Authority of New Orleans and River Gardens apartment managers on the grounds that the organizations gave preferential housing placement to employees and other persons. The suit alleged that the organizations violated an agreement that would have allowed tenants of the St. Thomas public housing complex to be relocated to the River Gardens public housing complex after demolition of St. Thomas. The suit was filed after a former tenant of St. Thomas was continually refused housing at River Gardens for more than one year, while other less qualified persons were given housing at River Gardens. Part of the lawsuit was settled in 2006 when the individual was ultimately offered housing in one of the housing authority's public housing sites.⁴⁴ The remaining portions of the suit were settled in 2007, with the Housing Authority of New Orleans and River Gardens managers being required to uphold their previous agreement and offer housing at River Gardens to all former tenants of the St. Thomas complex.⁴⁵

In 2008, the Kenner city council was accused of violating the Fair Housing Act when it enacted a yearlong ban on the development of multi-family housing units, or any housing with five or more units. The complaint alleged that the city council effectively banned housing for families with children, persons with disabilities and ethnic and racial minorities, all of which are considered protected classes under federal fair housing laws.⁴⁶

In 2008, St. Bernard Parish was ordered to pay nearly \$33,000 in the settlement of a housing discrimination lawsuit. The lawsuit was filed in response to an ordinance created by the parish council in 2006 that required persons wishing to rent single-family homes to anyone other than a blood relative to seek approval by the council. While the Parish argued that the ordinance was to promote home ownership, housing advocates argued that the ordinance would prevent non-whites and those with lower incomes from living in the parish. In the settlement, the Parish was required to pay \$20,000 to the Fair Housing Action Center and \$12,500 to the landowner who challenged the ordinance.⁴⁷ However, in 2009, St. Bernard Parish was found in contempt of the consent decree reached in the 2008 settlement when it adopted an ordinance restricting the development of multi-family units. According to the lawsuit, a moratorium was placed on the construction of multi-family units in 2008. The parish claimed that the ordinance was designed to protect property values, while housing advocates argued that it prevented the development of a \$60 million mixed-income apartment complex in Chalmette that would have aided racial and ethnic minorities in finding affordable housing. In the ruling, the Parish was ordered to abandon its moratorium on multi-family unit development and to pay all legal fees associated with the trial, which totaled more than \$150,000.⁴⁸

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

⁴³ http://gnofairhousing.org/pdfs/12-22-05-Press_release_Advertising_complaints.pdf

⁴⁴ <http://gnofairhousing.org/pdfs/12-05-06-RiverGardenPressRelease.pdf>

⁴⁵ <http://gnofairhousing.org/07-09-07-HRlsettlement.htm>

⁴⁶ <http://www.nola.com/news/t-p/frontpage/index.ssf?/base/news-28/120789128927440.xml&coll=1>

⁴⁷ <http://www.nola.com/news/t-p/frontpage/index.ssf?/base/news-2/1204093284207510.xml&coll=1>

⁴⁸ <http://www.nola.com/news/t-p/stbernard/index.ssf?/base/news-3/1248412977106510.xml&coll=1>

the charge, the respondent failed to acknowledge or allow numerous reasonable accommodation requests made by the disabled complainant. The severely deaf complainant had made several requests to be allowed to own service animals to let her to live independently, but the requests were repeatedly denied or ignored. The complainant was ultimately asked by the office to remove the pets or face eviction. The charge was filed after HUD investigated two complaints submitted by the alleged victim and found evidence of reasonable cause. The first complaint was filed with HUD in 2006 and alleged that the respondent had discriminated against the complainant based on disability. The second complaint was filed in 2007 and alleged that the respondent had retaliated against the complainant after the previous complaint was filed.⁴⁹

RELATED U.S. DEPARTMENT OF JUSTICE CASES

Under the Fair Housing Act, the U.S. Department of Justice (DOJ) may bring lawsuits in the following instances:

- Where there is reason to believe that a person or entity is engaged in what is termed a “pattern or practice” of discrimination, or where a denial of rights to a group of people raises an issue of general public importance.
- Where force or threat of force is used to deny or interfere with fair housing rights, the DOJ may institute criminal proceedings.
- Where people who believe that they have been victims of an illegal housing practice file a complaint with HUD, or file their own lawsuit in federal or state court. The DOJ brings suits on behalf of individuals based on referrals from HUD.

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

In March 2005, the Department of Justice reached a settlement to resolve allegations of discrimination against black tenants in more than 120 apartments in St. Bernard Parish. The lawsuit was brought about after testing conducted by the DOJ showed that apartment managers and owners in the area lied about the availability of units to potential black tenants, steered potential black tenants to certain complexes, and discouraged potential black tenants from renting through the company. The penalties include \$60,000 to be paid to the victims of the lawsuit, \$10,000 to the community to provide fair housing training, as well as \$100,000 to be paid to the government as civil penalties.⁵⁰

A case from May 2008 documented that a couple was sued by the DOJ after interfering with the sale of a home based on the race of the potential buyers. According to the report, the couple made threats to the sellers of a home after learning that the potential buyers were black. This ultimately caused the potential buyers to retract their offer. As a result of the case, the couple was required to pay penalties to the potential buyers in addition to civil penalties.⁵¹

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

⁴⁹ <http://portal.hud.gov/portal/page/portal/HUD/documents/MetairieTowersRedactedCharge.pdf>

⁵⁰ http://www.usdoj.gov/opa/pr/2005/March/05_crt_153.htm

⁵¹ http://www.usdoj.gov/opa/pr/2008/May/08_crt_447.html

were accused of discouraging families with children from renting apartment in a complex and also refusing to rent certain apartment units to families with children. The complaint was investigated through DOJ testing. The owner and the manager of the complex were required to pay nearly \$150,000 in compensation and civil penalties and undergo training in fair housing laws, record keeping and non-discrimination policies.⁵²

HOUSING COMPLAINTS

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

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

Table 5.1 presents the total number of complaints received by HUD in Louisiana. While more than 1,200 complaints were filed in the state between January 2000 and June 2009, 399 of these complaints were alleged to have occurred in the balance of Louisiana.

Table 5.2 shows data on the basis of the complaints, or what type of protections were involved in the case; each complaint that is submitted can be filed under more than one basis. So while 399 complaints were filed, a total of 504 bases were cited, most commonly for race and disability.

Entitlement	Total
City of Alexandria	17
City of Bossier City	23
East Baton Rouge Consolidated Area	134
Houma-Terrebonne Consolidated Area	12
Jefferson Parish	139
City of Kenner	23
Lafayette Consolidated Area	67
City of Lake Charles	31
City of Monroe	24
City of New Orleans	253
City of Shreveport	62
City of Slidell	21
City of Thibodaux	5
Balance	399
Total	1,210

Year	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	Total
Race	38	23	46	17	34	40	31	32	23	1	285
Disability	8	5	43	8	7	15	5	11	1	4	107
Family Status	5	3	6	5	7	9	9	6	6	.	56
Sex	5	4	1	1	3	3	3	3	2	.	25
Retaliation	3	1	3	1	2	.	.	.	1	.	11
Harassment	.	.	1	.	2	1	1	1	1	.	7
Color	.	.	.	3	.	1	4
Religion	1	.	1	1	1	.	4
National Origin	.	1	.	.	.	1	.	1	.	.	3
Other Origin	2	2
Total Basis	60	37	101	35	55	72	49	55	35	5	504
Total Complaints	47	33	70	28	50	53	42	44	28	4	399

⁵² <http://www.usdoj.gov/opa/pr/2008/September/08-crt-869.html>

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

Table 5.3											
Fair Housing Complaints by Issue											
Balance of State											
HUD Data, 2000 – 6/2009											
Issue	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	Total
Discrimination in terms/conditions/privileges relating to rental	22	10	9	15	21	27	12	24	10	1	150
Discriminatory terms, conditions, privileges, or services etc.	5	4	13	6	10	11	9	11	9	3	78
Discriminatory refusal to rent	2	3	3	3	11	11	6	15	5	1	59
Discriminatory refusal to rent and negotiate for rental	6	3	2	7	10	8	10	6	5	.	57
Discriminatory acts under Section 818 (coercion, etc.)	10	3	1	2	8	4	5	9	3	.	45
Other discriminatory acts	1	.	41	42
Failure to make reasonable accommodation	3	.	4	1	3	4	2	2	1	.	20
Discriminatory financing (includes real estate transactions)	4	3	2	1	1	3	1	.	2	.	17
Discrimination in terms/conditions/privileges relating to sale	1	1	1	.	3	6	3	.	1	.	16
Discriminatory refusal to sell and negotiate for sale	2	3	.	1	2	3	3	2	.	.	16
False denial or representation of availability - rental	3	5	1	.	4	.	1	.	2	.	16
Discriminatory advertising, statements and notices	2	1	1	.	3	1	.	3	.	.	11
Discrimination in the terms or conditions for making loans	1	1	1	.	.	1	2	2	.	.	8
Steering	1	1	.	2	.	3	7
Using ordinances to discriminate in zoning and land use	.	.	.	1	.	.	3	2	1	.	7
Discriminatory refusal to negotiate for rental	2	.	.	.	1	.	1	1	.	.	5
Discrimination in making of loans	1	1	1	.	.	1	4
Discrimination in the selling of residential real property	.	1	2	.	1	.	4
Discrimination in services and facilities relating to rental	1	.	2	.	.	.	3
Discriminatory advertisement - rental	.	.	.	3	3
Discriminatory refusal to negotiate for sale	1	1	1	.	3
Discriminatory refusal to sell	.	1	.	.	1	.	1	.	.	.	3
False denial or representation of availability	.	.	.	2	1	3
Otherwise deny or make housing available	.	.	1	.	.	.	1	.	1	.	3
Refusing to provide municipal services or property	2	.	.	1	.	.	3
Discriminatory brokerage service	1	1	.	.	.	2
Failure to permit reasonable modification	.	1	.	1	2
Restriction of choices relative to a rental	.	.	.	1	.	.	1	.	.	.	2
Adverse action against an employee	1	.	.	1
Complaint withdrawn by complainant after resolution	1	1
Complaint withdrawn by complainant after resolution	1	1
Discrimination in services and facilities relating to sale	1	1
Discrimination in the appraising of residential real property	.	.	1	1
False denial or representation of availability - sale	1	1
Redlining	1	1
Refusing to provide insurance
Total	69	43	82	46	84	85	66	79	42	5	596

Table 5.4. presents the closure status of these complaints. The majority of the complaints, 174, were found to have a “no cause determination,” meaning that discrimination was not found. An additional 94 complaints were settled successfully and 46 complaints were closed when the complainant failed to cooperate.

Table 5.4											
Fair Housing Complaints by Closure											
Balance of State											
HUD Data, 2000 – 6/2009											
Closure	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	Total
No cause determination	26	16	27	14	23	26	10	20	10	2	174
Conciliation/settlement successful	10	7	3	9	16	12	14	11	11	1	94
Complainant failed to cooperate	3	5	6	2	5	5	6	10	4	.	46
Dismissed for lack of jurisdiction	.	.	21	1	1	2	.	1	1	.	27
Complaint withdrawn by complainant w/out resolution	2	1	10	1	.	2	6	2	.	.	24
Complaint withdrawn by complainant after resolution	6	2	2	1	1	6	3	.	1	1	23
Unable to locate complainant	.	2	1	.	2	.	1	.	.	.	6
Untimely filed	2	.	.	.	2
Administrative hearing ended - discrimination found	1	.	1
Closed because trial has begun	1	1
Election made to go to court	1	1
DOJ dismissal
FHAP judicial consent order
FHAP judicial dismissal
Litigation ended - discrimination found
Total	47	33	70	28	50	53	42	44	28	4	399

COMPLAINTS FILED WITH THE LOUISIANA DEPARTMENT OF JUSTICE

As a substantially equivalent agency, the Louisiana Department of Justice (LDOJ) also accepts fair housing complaints within the state. A tabulation of complaints was received from the LDOJ. However, this data set lacked detailed information about the specific geographic area of alleged discriminatory activities.⁵³ Complaints from the LDOJ were provided from 1999 through October 2009.

Table 5.5 presents the number of fair housing complaints received by the LDOJ from January 1999 through October 2009 by parish. Orleans Parish showed the highest number of complaints received during this time period, followed by Jefferson Parish, East Baton Rouge Parish and Lafayette Parish. A total of 253 complaints were filed in non-entitlement areas portions of Louisiana.

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

⁵³ Some data by parish was ultimately received, but not in a timely enough manner for inclusion in this report.

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

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

Description	Total
Race	643
Handicap	162
Familial Status	154
Sex	102
National Origin	39
Religion	15
Color	10
Future Use	1
Retaliation	0
Total	1,126

Year	Total
No Cause Determination	453
Conciliation successful	277
Complainant Failed to cooperate	67
Withdrawn by complainant without resolution	51
Withdrawn by complainant after resolution	38
Unable to locate complainant	25
Dismissed for lack of jurisdiction	18
Litigation ended - discrimination found	7
ALJ dismissal	4
Cased deferred back to HUD	4
Discrimination found	3
DOJ dismissal	3
Unable to identify respondent	1
Missing	0
Total	951

FAIR HOUSING SURVEY

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

A total of 451 responses were received from stakeholders throughout the state of Louisiana. Table 5.8 presents the number of responses by entitlement and shows that only nine responses were received from non-entitlement portions of the state. Thus, statewide results were reviewed.

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

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

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

Table 5.9 Primary Role in the Housing Industry State of Louisiana 2009 Fair Housing Survey	
Role	Total
Advocate	62
Concerned citizen	49
Bank/financial services	42
Housing developer	33
Program manager	28
Mortgage lending	24
Education/educator	20
Property management	19
Other services	13
Real estate agent	12
Construction	11
Business services	9
Concerned Citizen	9
Welfare services	5
Building inspection	4
Law/legal services	4
Architect	3
Financial management	2
Program Manager	1
Public safety	1
Other (please specify)	93
Missing	7
Total	451

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

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

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

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

- Lack of accessible, available and affordable housing,
- Discrimination in the rental markets especially against persons of color,
- Lack of understanding of tenant rights and landlord responsibilities,
- Lack of knowledge of fair housing,
- Lack of education pertaining to fair housing,
- Lack of presence of a statewide agency dedicated to education, enforcement and outreach efforts,
- Mortgages difficult to obtain by certain races,
- Redlining and steering, and
- Alleged use of zoning ordinances or regulations that restrict affordable housing development, including construction moratoriums.

However, some of these concerns are not necessarily impediments to fair housing choice. The lack of available and affordable housing is an important housing planning issue. Furthermore, the quality of the relationships between landlords and tenants is also a housing consideration. However, these are not typically impediments to fair housing choice, as defined previously, unless the action is due to protected class status. Additional outreach and education about fair housing, affordable housing planning, and

landlord/tenant responsibilities would help to better frame the three topics and assist in affirmatively furthering fair housing.

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

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

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

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

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

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

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

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

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

Respondents were also asked: If someone came to them alleging to be a victim of a fair housing violation, to what individual or organization would they refer the alleged victim? Respondents were not consistent in their responses. As seen in Table 5.14, 171 respondents did not provide an answer and 54 respondents did not know, while 83 persons suggested HUD and 53 suggested the Greater New Orleans Fair Housing Action Center. In the state of Louisiana, the Louisiana Department of Justice is HUD's designated substantially equivalent agency and complainants should be referred to this entity. It appears that the expert community responding to the 2009 fair housing survey was not aware of this. Consequently, the referral system may not be working well.

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

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

SUMMARY

FAIR HOUSING STUDIES AND CASES

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

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

FAIR HOUSING COMPLAINT DATA

Fair housing complaint data collected from the U.S. Department of Housing and Urban Development and the Louisiana Department of Justice showed that 399 fair housing complaints were filed in non-entitlement portions of the state in the last nine to ten years. Most complaints were filed on the bases of race or disability and were either found to have no cause or were settled successfully.

FAIR HOUSING SURVEY DATA

A fair housing survey was conducted throughout Louisiana and results showed that most respondents were aware of fair housing laws and find them easy to understand. Respondents noted issues of government actions or policies representing barriers to fair housing or specific areas within the entitlement that have fair housing problems. There was also substantive confusion about the difference between affordable housing planning and production and landlord/tenant law and affirmatively furthering fair housing. Furthermore, respondents expressed concerns about discrimination in the rental markets as well as an

overall lack of understanding of fair housing law. Respondents, who were supposed to represent an expert community, did not seem to fully be aware of the fair housing responsibilities of the Louisiana Department of Justice. Last, the majority of respondents noted that there is a lack of fair housing outreach and education efforts in their community.

SECTION VI. IMPEDIMENTS AND SUGGESTED ACTIONS

IDENTIFIED IMPEDIMENTS TO FAIR HOUSING CHOICE

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

Statewide Impediments to Fair Housing Choice

Three Categories:

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

A. Insufficient Fair Housing System Capacity

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

B. Ineffective Communication and Coordination

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

C. Lack of Understanding of Fair Housing

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

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

Suggested Statewide Actions to Consider

Three Goals:

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

A. Improve Fair Housing System Capacity

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

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

B. Increase Communication and Coordination

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

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

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

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

Impediments to Fair Housing Choice for Non-Entitlement Areas in Louisiana

1. Insufficient fair housing system capacity to respond to questions or concerns or to address fair housing needs as well as administer fair housing activities.
2. Lack of sufficient fair housing outreach and education resulting in:
 - a. Lack of understanding of fair housing issues and knowledge of fair housing laws,
 - b. Confusion about the differences between fair housing, housing production planning, and landlord/tenant issues.
3. Lack of sufficient financial literacy resulting in:
 - a. Disproportionately high denial rates for racial and ethnic minorities,
 - b. Denial rates disproportionately high in lower-income areas, and
 - c. Originated high annual percentage rate loans targeted to minority areas.
4. Discrimination in rental markets, including failure to make reasonable accommodation.
5. Implementation of local land use codes and/or zoning regulations, or the use of construction moratoriums and householder ordinances that may not be in the spirit of affirmatively furthering fair housing

Suggested Two-Year Fair Housing Action Plan

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

1. Form a working group that will have the authority to determine, fund and take specific actions to affirmatively further fair housing throughout the state. This group will be identified by the end of December 2010.
 - a. During the July 1 through December 31, 2010 time period the group will accomplish the following:
 - i. Elect chair, vice chair and treasurer for the group;
 - ii. Determine meeting schedule and frequency, such as monthly or quarterly, as well as the location parameters, such as rotating locations or fixed locations;
 - iii. Prepare a list of fair housing activities to be undertaken, such as outreach and education, audit testing, or fair housing documentation procedures;
 - iv. Prepare a set of draft RFPs to be released that will hire contractors to conduct the fair housing activities. Each will have specific measurement criteria so that fair housing activities that are undertaken can be measured;
 - v. Invite the Louisiana Department of Justice to participate in affirmatively furthering fair housing and in the operation of the working group;
 - vi. Develop a consistent fair housing referral system and distribute to all group members and have the members distribute this within their own communities.
 - b. During the January 1, 2011 through June 30, 2011 time period, accomplish the following organizational and activity objectives:
 - i. Determine which entitlement or work group participant is to be the fiscal agent;
 - ii. Sign contracts with the fiscal agent and the fiscal agent signs contracts with the working group participants;
 - iii. Determine the precise CPD allocation percent that will represent the funding source. This represents a uniform portion or share of the HUD CPD allocation received by each of the participants;
 - iv. Send allocations to fiscal agent;
 - v. Finalize the RFP documents and release the RFPs for bid.
 - c. During the second year of the existence of the working group the following actions should be considered:
 - i. Elect a new chairman, vice chair and treasurer;
 - ii. Determine meeting schedule and frequency, such as monthly or quarterly, as well as the location parameters, such as rotating locations or fixed locations;
 - iii. Select contractors to conduct the bid fair housing activities and initiate all projects;
 - iv. Have the treasurer initiate payments to the selected contractors;
 - v. Have the treasurer research the feasibility of converting the working group to a non-profit corporation, with the participants as members and without any payroll. This will allow private companies to contribute tax-deductible contributions to the fair housing organization;
 - vi. Determine if non-profit status will be beneficial for the group;
 - vii. Prepare a list of fair housing activities to be undertaken during the upcoming year, such as outreach and education, audit testing, or fair housing documentation procedures;
 - viii. Send fiscal agent budget allocations;
 - ix. Issue a progress review document that evaluates the contracted fair housing activities for effectiveness;

- x. Revise or enhance the description of fair housing activities to be conducted in the next year;
- xi. Determine the precise CPD allocation percent that will represent the funding source. This represents a uniform portion or share of the HUD CPD allocation received by each of the participants;
- xii. Finalize the RFP documents and release the RFPs for bid;
- xiii .Decide on fair housing contractors to be used for the second round of Louisiana fair housing activities.

Suggested Office of Community Development Actions to Consider

1. Implement all the actions stated in statewide Actions to Consider.
2. Participate in the proposed Louisiana Fair Housing Working Group.
 - a. Direct staff to take responsibility for operation of the FHWG.
 - b. Organize and conduct public relations for the FHWG.
3. Increase fair housing outreach and education to residents of the state's non-entitlement areas.
 - a. Establish liaison responsibility with the Louisiana Department of Justice (LDOJ),
 - b. Coordinate outreach and educational efforts with the LDOJ.
4. Enhance homebuyer education activities, increasing financial literacy.
5. Monitor current and upcoming housing projects to be certain that they are in compliance with the Americans with Disabilities Act and fair housing law for the disabled.
6. Enhance educational opportunities for existing landlords in the non-entitlement areas of the state.
7. Review inclusiveness of housing development activities, including efforts to eliminate segregation of racial and ethnic minorities.
 - a. Assist the statewide FHWG with research on identification of best practices,
 - b. Assist the statewide FHWG to make specific recommendations for zoning and land use regulations, including a review of householder ordinances.

APPENDIX A. ADDITIONAL CENSUS DATA

Table A.1 Population by Ethnicity Balance of State 2000 Census SF1 Data	
Ethnicity	Population
Hispanic	43,455
Non-Hispanic	2,494,619
Total Population	2,538,074
Percent Hispanic	1.71%

Table A.2 Group Quarters Population Balance of State 2000 Census SF1 Data	
Group Quarters	Population
Institutionalized	
Correctional Institutions	36,941
Nursing Homes	18,146
Other Institutions	5,370
Total	60,457
Noninstitutionalized	
College Dormitories	8,257
Military Quarters	2,792
Other Noninstitutional Group Quarters	6,121
Total	17,170
Group Quarters Population	77,627

APPENDIX B. ADDITIONAL HMDA DATA

Table B.1							
Owner-Occupied Home Purchase Loan Applications by Loan Type							
Balance of State							
HMDA Data 2002 - 2007							
Loan Type	2002	2003	2004	2005	2006	2007	Total
Conventional	39,685	40,367	51,077	61,725	65,497	54,048	312,399
FHA - Insured	7,969	6,786	6,252	6,355	5,909	4,786	38,057
VA - Guaranteed	1,962	2,102	1,974	2,033	1,928	1,861	11,860
Rural Housing Service or Farm Service Agency	1,015	1,620	1,628	1,639	1,457	2,350	9,709
Total	50,631	50,875	60,931	71,752	74,791	63,045	372,025

Table B.2								
Owner-Occupied Home Purchase Loan Applications by Selected Action Taken by Race								
Balance of State								
HMDA Data 2002 - 2007								
Race		2002	2003	2004	2005	2006	2007	Total
American Indian or Alaskan Native	Originated	116	106	104	137	98	104	665
	Denied	54	59	85	83	56	66	403
	Denial Rate %	31.8%	35.8%	45.0%	37.7%	36.4%	38.8%	37.7%
Asian or Pacific Islander	Originated	249	185	302	309	311	326	1,682
	Denied	42	63	73	97	84	74	433
	Denial Rate %	14.4%	25.4%	19.5%	23.9%	21.3%	18.5%	20.5%
Black	Originated	2,619	2,594	3,371	4,080	4,522	3,554	20,740
	Denied	2,917	2,410	2,833	3,226	3,340	3,037	17,763
	Denial Rate %	52.7%	48.2%	45.7%	44.2%	42.5%	46.1%	46.1%
Hispanic (Race)	Originated	352	356	0	0	0	0	708
	Denied	125	118	0	0	0	0	243
	Denial Rate %	26.2%	24.9%	25.6%
White	Originated	18,436	20,073	21,435	25,542	25,948	21,633	133,067
	Denied	6,502	6,589	6,939	8,339	8,198	7,318	43,885
	Denial Rate %	26.1%	24.7%	24.5%	24.6%	24.0%	25.3%	24.8%
Other	Originated	166	145	311
	Denied	35	61	96
	Denial Rate %	17.4%	29.6%	23.6%
Not Provided by Applicant	Originated	2,249	1,617	1,578	1,858	2,649	1,848	11,799
	Denied	2,491	1,144	1,149	1,364	1,719	1,140	9,007
	Denial Rate %	52.6%	41.4%	42.1%	42.3%	39.4%	38.2%	43.3%
Not Applicable	Originated	71	50	77	9	8	12	227
	Denied	57	2	8	4	0	0	71
	Denial Rate %	44.5%	3.8%	9.4%	30.8%	0.0%	0.0%	23.8%
Total	Originated	24,258	25,126	26,867	31,935	33,536	27,477	169,199
	Denied	12,223	10,446	11,087	13,113	13,397	11,635	71,901
	Denial Rate %	33.5%	29.4%	29.2%	29.1%	28.5%	29.7%	29.8%
Hispanic (Ethnicity)	Originated			563	635	649	534	2,381
	Denied			284	322	266	251	1,123
	Denial Rate %			33.5%	33.6%	29.1%	32.0%	32.0%

Table B.3								
Owner-Occupied Home Purchase Loan Applications by Selected Action Taken by Gender								
Balance of State								
HMDA Data 2002 - 2007								
Gender		2002	2003	2004	2005	2006	2007	Total
Male	Originated	17,237	18,298	19,376	22,627	23,690	19,800	121,028
	Denied	6,482	6,280	6,774	8,039	8,180	7,057	42,812
	Denial Rate %	27.3%	25.6%	25.9%	26.2%	25.7%	26.3%	26.1%
Female	Originated	5,318	5,879	6,860	8,378	8,618	6,864	41,917
	Denied	3,499	3,405	3,763	4,466	4,439	3,960	23,532
	Denial Rate %	39.7%	36.7%	35.4%	34.8%	34.0%	36.6%	36.0%
Not Provided by Applicant	Originated	1,673	903	605	921	1,221	794	6,117
	Denied	2,197	760	548	604	778	618	5,505
	Denial Rate %	56.8%	45.7%	47.5%	39.6%	38.9%	43.8%	47.4%
Not Applicable	Originated	30	46	26	9	7	19	137
	Denied	45	1	2	4	0	0	52
	Denial Rate %	60.0%	2.1%	7.1%	30.8%	0.0%	0.0%	27.5%
Total	Originated	24,258	25,126	26,867	31,935	33,536	27,477	169,199
	Denied	12,223	10,446	11,087	13,113	13,397	11,635	71,901
	Denial Rate %	33.5%	29.4%	29.2%	29.1%	28.5%	29.7%	29.8%

Table B.4								
Action of Owner-Occupied Home Purchase Loan Applications by Income: Originated and Denied								
Balance of State								
HMDA Data 2002 - 2007								
Income Group		2002	2003	2004	2005	2006	2007	Total
\$15,000 or less	Loan Originated	523	518	448	362	364	208	2,423
	Application Denied	1,080	912	860	802	591	533	4,778
	Denial Rate %	67.4%	63.8%	65.7%	68.9%	61.9%	71.9%	66.4%
More than \$15,000 up to \$30,000	Loan Originated	4,515	4,450	4,295	4,267	3,565	2,783	23,875
	Application Denied	4,801	3,819	3,722	4,123	3,429	2,880	22,774
	Denial Rate %	51.5%	46.2%	46.4%	49.1%	49.0%	50.9%	48.8%
More than \$30,000 up to \$45,000	Loan Originated	5,886	6,089	6,441	7,331	6,929	5,655	38,331
	Application Denied	3,282	2,704	2,774	3,387	3,442	2,922	18,511
	Denial Rate %	35.8%	30.8%	30.1%	31.6%	33.2%	34.1%	32.6%
More than \$45,000 up to \$60,000	Loan Originated	4,748	4,977	5,459	6,286	6,915	5,480	33,865
	Application Denied	1,584	1,578	1,686	2,171	2,455	2,114	11,588
	Denial Rate %	25.0%	24.1%	23.6%	25.7%	26.2%	27.8%	25.5%
More than \$60,000 up to \$75,000	Loan Originated	3,230	3,294	3,617	4,393	4,847	3,954	23,335
	Application Denied	654	605	752	1,017	1,299	1,170	5,497
	Denial Rate %	16.8%	15.5%	17.2%	18.8%	21.1%	22.8%	19.1%
More than \$75,000	Loan Originated	4,869	5,278	6,066	8,464	10,019	9,026	43,722
	Application Denied	688	669	933	1,366	1,875	1,855	7,386
	Denial Rate %	12.4%	11.2%	13.3%	13.9%	15.8%	17.0%	14.5%
Data Missing	Loan Originated	487	520	541	832	897	371	3,648
	Application Denied	134	159	360	247	306	161	1,367
	Denial Rate %	21.6%	23.4%	40.0%	22.9%	25.4%	30.3%	27.3%
Total	Loan Originated	24,258	25,126	26,867	31,935	33,536	27,477	169,199
	Application Denied	12,223	10,446	11,087	13,113	13,397	11,635	71,901
	Denial Rate %	33.5%	29.4%	29.2%	29.1%	28.5%	29.7%	29.8%

Table B.5
Action of Owner-Occupied Home Purchase Loan Applications by Income By Race:
Originated and Denied

Balance of State
HMDA Data 2002 - 2007

Race		<= \$15K	\$15K - \$30K	\$30K - \$45K	\$45K - \$60K	\$60K - \$75K	> \$75K	Data Missing	Total
American Indian or Alaskan Native	Loan Originated	12	106	155	149	84	146	13	665
	Application Denied	28	117	99	83	34	41	1	403
	Denial Rate %	70.0%	52.5%	39.0%	35.8%	28.8%	21.9%	7.1%	37.7%
Asian or Pacific Islander	Loan Originated	10	174	338	341	217	505	97	1,682
	Application Denied	23	99	99	76	48	75	13	433
	Denial Rate %	69.7%	36.3%	22.7%	18.2%	18.1%	12.9%	11.8%	20.5%
Black	Loan Originated	590	4,865	5,600	3,926	2,212	3,283	264	20,740
	Application Denied	1,786	6,995	4,452	2,244	965	1,119	202	17,763
	Denial Rate %	75.2%	59.0%	44.3%	36.4%	30.4%	25.4%	43.3%	46.1%
Hispanic (Race)	Loan Originated	16	152	209	127	68	113	23	708
	Application Denied	14	78	63	48	17	17	6	243
	Denial Rate %	46.7%	33.9%	23.2%	27.4%	20.0%	13.1%	20.7%	25.6%
White	Loan Originated	1,546	17,169	29,537	26,871	18,964	36,149	2,831	133,067
	Application Denied	2,318	12,800	11,600	7,663	3,716	5,086	702	43,885
	Denial Rate %	60.0%	42.7%	28.2%	22.2%	16.4%	12.3%	19.9%	24.8%
Other	Loan Originated	6	48	76	60	38	74	9	311
	Application Denied	4	33	27	19	2	8	3	96
	Denial Rate %	40.0%	40.7%	26.2%	24.1%	5.0%	9.8%	25.0%	23.6%
Not Provided by Applicant	Loan Originated	242	1,341	2,383	2,353	1,732	3,416	332	11,799
	Application Denied	600	2,619	2,149	1,450	714	1,038	437	9,007
	Denial Rate %	71.3%	66.1%	47.4%	38.1%	29.2%	23.3%	56.8%	43.3%
Not Applicable	Loan Originated	1	20	33	38	20	36	79	227
	Application Denied	5	33	22	5	1	2	3	71
	Denial Rate %	83.3%	62.3%	40.0%	11.6%	4.8%	5.3%	3.7%	23.8%
Total	Loan Originated	2,423	23,875	38,331	33,865	23,335	43,722	3,648	169,199
	Application Denied	4,778	22,774	18,511	11,588	5,497	7,386	1,367	71,901
	Denial Rate %	66.4%	48.8%	32.6%	25.5%	19.1%	14.5%	27.3%	29.8%
Hispanic (Ethnic)	Loan Originated	28	241	580	508	318	644	62	2,381
	Application Denied	65	296	276	194	122	152	18	1,123
	Denial Rate %	69.9%	55.1%	32.2%	27.6%	27.7%	19.1%	22.5%	32.0%

Table B.6
Percent Denial Rates by Income by Year for White Applicants

Balance of State
HMDA Data 2002 - 2007

Year	2002	2003	2004	2005	2006	2007	Total
<= \$15K	58.1%	56.6%	59.1%	63.4%	60.9%	65.1%	60.0%
\$15K - \$30K	42.8%	41.3%	41.0%	43.7%	43.1%	45.3%	42.7%
\$30K - \$45K	29.3%	27.2%	26.1%	28.0%	29.1%	29.7%	28.2%
\$45K - \$60K	20.5%	20.5%	20.8%	22.6%	23.6%	24.3%	22.2%
\$60K - \$75K	13.0%	13.9%	15.1%	16.4%	18.1%	20.0%	16.4%
Above \$75K	9.8%	9.9%	11.5%	12.1%	12.8%	15.2%	12.3%
Data Missing	12.7%	17.0%	29.9%	16.4%	19.1%	24.1%	19.9%
Total	26.1%	24.7%	24.5%	24.6%	24.0%	25.3%	24.8%

Table B.7
Percent Denial Rates by Income by Year for Black Applicants

Balance of State
HMDA Data 2002 - 2007

Year	2002	2003	2004	2005	2006	2007	Total
<= \$15K	74.7%	72.9%	74.1%	76.9%	73.9%	80.1%	75.2%
\$15K - \$30K	62.6%	58.5%	56.7%	57.7%	57.7%	61.0%	59.0%
\$30K - \$45K	49.1%	43.6%	41.7%	40.9%	43.8%	47.6%	44.3%
\$45K - \$60K	39.5%	38.1%	34.5%	36.0%	32.9%	39.5%	36.4%
\$60K - \$75K	31.0%	27.2%	26.1%	27.9%	32.0%	34.3%	30.4%
Above \$75K	24.9%	17.8%	25.2%	22.2%	29.5%	25.7%	25.4%
Data Missing	22.0%	26.7%	55.2%	46.6%	36.4%	56.5%	43.3%
Total	52.7%	48.2%	45.7%	44.2%	42.5%	46.1%	46.1%

Table B.8
**Originated Owner-Occupied Home Purchase Loans
by Race by HAL Status**

Balance of State
HMDA Data 2004 - 2007

Race	Loan Type	2004	2005	2006	2007	Total
American Indian	Other Originated	65	79	55	68	267
	High APR Loan	39	58	43	36	176
	Percent High APR	37.5%	42.3%	43.9%	34.6%	39.7%
Asian	Other Originated	230	229	233	250	942
	High APR Loan	72	80	78	76	306
	Percent High APR	23.8%	25.9%	25.1%	23.3%	24.5%
Black or African American	Other Originated	2,038	1,929	2,270	2,199	8,436
	High APR Loan	1,336	2,153	2,255	1,360	7,104
	Percent High APR	39.6%	52.7%	49.8%	38.2%	45.7%
White	Other Originated	16,806	18,646	18,793	16,511	70,756
	High APR Loan	4,653	6,920	7,172	5,143	23,888
	Percent High APR	21.7%	27.1%	27.6%	23.8%	25.2%
Not Provided by Applicant	Other Originated	1,232	1,194	1,620	1,367	5,413
	High APR Loan	350	664	1,029	481	2,524
	Percent High APR	22.1%	35.7%	38.8%	26.0%	31.8%
Not Applicable	Other Originated	68	7	7	9	91
	High APR Loan	9	2	1	3	15
	Percent High APR	11.7%	22.2%	12.5%	25.0%	14.2%
Total	Other Originated	20,439	22,084	22,978	20,404	85,905
	High APR Loan	6,459	9,877	10,578	7,099	34,013
	Percent High APR	24.0%	30.9%	31.5%	25.8%	28.4%
Hispanic	Other Originated	438	436	430	410	1,714
	High APR Loan	125	199	219	125	668
	Percent High APR	22.2%	31.3%	33.7%	23.4%	28.0%

Table B.9						
Originated Owner-Occupied Home Purchase Loans by Income by HAL Status						
Balance of State						
HMDA Data 2004 - 2007						
Income Group		2004	2005	2006	2007	Total
\$15,000 or less	Other Originated	208	151	199	92	650
	High APR Loan	240	212	165	116	733
	Percent High APR	53.6%	58.4%	45.3%	55.8%	53.0%
More than \$15,000 up to \$30,000	Other Originated	2,712	2,281	1,932	1,569	8,494
	High APR Loan	1,587	1,989	1,633	1,215	6,424
	Percent High APR	36.9%	46.6%	45.8%	43.6%	43.1%
More than \$30,000 up to \$45,000	Other Originated	4,587	4,563	4,332	3,929	17,411
	High APR Loan	1,863	2,775	2,602	1,731	8,971
	Percent High APR	28.9%	37.8%	37.5%	30.6%	34.0%
More than \$45,000 up to \$60,000	Other Originated	4,198	4,325	4,615	4,069	17,207
	High APR Loan	1,273	1,966	2,305	1,419	6,963
	Percent High APR	23.3%	31.3%	33.3%	25.9%	28.8%
More than \$60,000 up to \$75,000	Other Originated	2,998	3,270	3,451	3,079	12,798
	High APR Loan	623	1,130	1,399	878	4,030
	Percent High APR	17.2%	25.7%	28.8%	22.2%	23.9%
More than \$75,000	Other Originated	5,266	6,855	7,834	7,407	27,362
	High APR Loan	802	1,612	2,189	1,628	6,231
	Percent High APR	13.2%	19.0%	21.8%	18.0%	18.5%
Data Missing	Other Originated	470	639	615	259	1,983
	High APR Loan	71	193	285	112	661
	Percent High APR	13.1%	23.2%	31.7%	30.2%	25.0%
Total	Other Originated	20,439	22,084	22,978	20,404	85,905
	High APR Loan	6,459	9,877	10,578	7,099	34,013
	Percent High APR	24.0%	30.9%	31.5%	25.8%	28.4%

Table B.10						
Percent of HAL Owner-Occupied Home Purchase Loans Originated by Income						
Balance of State						
HMDA Data 2004 - 2007						
Income	2004	2005	2006	2007	Total	
<= \$15K	53.6%	58.4%	45.3%	55.8%	53.0%	
\$15K - \$30K	36.9%	46.6%	45.8%	43.6%	43.1%	
\$30K - \$45K	28.9%	37.8%	37.5%	30.6%	34.0%	
\$45K - \$60K	23.3%	31.3%	33.3%	25.9%	28.8%	
\$60K - \$75K	17.2%	25.7%	28.8%	22.2%	23.9%	
> \$75K	13.2%	19.0%	21.8%	18.0%	18.5%	
Data Missing	13.1%	23.2%	31.7%	30.2%	25.0%	
Total	24.0%	30.9%	31.5%	25.8%	28.4%	

APPENDIX C. ADDITIONAL FAIR HOUSING SURVEY DATA

Table C.1

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

State of Louisiana
2009 Fair Housing Survey

1. All clients are given the opportunity to choose any home they can afford, and not steered into certain areas/neighborhoods. 2. That they are sold homes that meet the standards of livability.

a lack of accessible, affordable housing

Access by some protected classes

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

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

accessibility for the disabled and discrimination against PSH tenants

affordability and availability

Affordable housing, either renting or buying a dwelling

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

Age & sex

All is one area

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

availability

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

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

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

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

conditions of rental units

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

Disc. against young AA males Disc. from apt complexes/tax credit unit developers Discr. against folks with SA/MH diagnosis

Very few accessible units (complexes not meeting compliance)

discrimination

discrimination

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

Discrimination against Affordable Housing

Discrimination against individuals that are in a lower socioeconomic group.

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

discrimination against persons of color and poor families generally

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

discrimination based on race

Discrimination based on race

Discrimination based on race and income and poor education

discrimination still exists

discrimination

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

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

Does not address need of individual, such as education to owners, managers, but more a "got you" attitude, rather than assistance

due to recent news, I am concerned that people are being treated unfairly and taken advantage of and that my tax dollars are not being spent properly

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

Table C.1 Cont'd
What are your concerns about fair housing in your community?

State of Louisiana
2009 Fair Housing Survey

Equal housing for all joint races.

Ethnicity or Race Disabled and Elderly

Ethnicity or Race, Disabled and Elderly

Extensive NIMBYism

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

Hammond is not listed as an area in the survey

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

High price for either purchasing a home or renting one

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

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

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

I am concerned about race discrimination for rental properties.

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

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

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

I do not see active enforcement across the board

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

I want programs to promote more home ownership

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

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

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

Increased rates for housing

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

Lack of affordable and mixed income units.

lack of affordable housing becomes a de facto discrimination issue

Lack of affordable housing.

lack of availability

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

lack of high quality affordable housing

Lack of knowledge

Lack of knowledge of and enforcement of these laws

Lack of parity in quality of affordable housing for protected populations

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

Landlords charge too much for rent

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

Laws against discrimination are not always enforced.

Limited affordable Housing

low income families & singles

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

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

Table C.1 Cont'd
What are your concerns about fair housing in your community?

State of Louisiana
2009 Fair Housing Survey

my concerns are equal rights for everyone

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

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

NIMBY Failure to follow accessibility guidelines

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

NIMBYism by parish officials preventing the development of affordable housing

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

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

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

Not enough affordable housing stock available to those in need.

Not enough fair housing available

not enough landlords who will accept Section 8

Not enough low-moderate rental housing available.

not enough rental properties

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

Over pricing to control population

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

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

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

People who rent and don't pay.

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

Persons on Disability are denied housing.

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

Race & Age

Racial Discrimination

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

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

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

redhibition and steering

redlining

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

renter rights movement is not really present

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

Shortage of affordable housing Long waiting lists for housing assistance programs

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

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

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

that landlords discriminate, especially based on race

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

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

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

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

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

the elderly

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

the need for additional affordable units

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

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

There is not enough housing available, period.

There is some discrimination that exists in neighborhoods

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

too costly

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

What are we doing to get more low income housing

What does it affect and how long?

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

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

Widespread racism Discrimination against people with disabilities Discrimination against gay people

Table C.2
Survey Results: What are the barriers or constraints to affirmatively furthering fair housing?
 State of Louisiana
 2009 Fair Housing Survey

1. A willingness not to be fair in helping clients obtain the best mortgages. 2. Outrageous closing costs.
 A major barrier is created when city agencies change zoning codes so as not to allow specific housing activities.
 action center focuses on Orleans parish for the most part
 affordability
AFFORDABILITY
 Affordability Discrimination Not enough adequate housing
 again, regulatory rather than educational
 an astonishing lack of commitment to the principle of affirmatively furthering fair housing on the part of elected officials and government workers, ignorance, racism, corruption, no enforcement mechanism (lack of HUD regulations regarding the duty to affirmatively further)
 applications are not ways to understand
 As with anything institutionalized, it is difficult to identify, let alone prevent, discrimination in the housing market because it is widespread and relatively amorphous. However, there are certainly groups taking steps to reverse it, and overt acts of discrimination are, I believe, becoming less common.
 Availability
 Availability of safe, affordable housing
 barriers are peoples' fear of "the other"
 Citizens need to be educated regarding fair treatment of everyone
 City Planning. Enough and/or a variety of housing options available on the market.
 City will change zoning, etc to exclude affordable housing.
 Commitment and buy-in of community stakeholders, including stakeholders, politicians, etc.
 Constraints exist, primarily in the form of bias, however through better education we should be able to make progress in eliminating these. I am thinking specifically of community homes that house disabled citizens. Many local residents are openly concerned about and/or opposed to community homes locating in their neighborhoods.
 Contractors need more info on bidding jobs & receiving grants, example I tried to approach FEMA with NOLA 90% flood proof house design for same price as stick built, never made contacts yet some nonprofits get multimillion dollar grants & take 3 plus years to build 1st home.
 Cost associated with safe decent housing.
 cost of housing exceeds affordability, limiting choices
 Costs of Implementation
 Creating housing that is truly affordable and raising the income bracket to assist more individuals that fall into a middle income bracket that may need some assistance
 Discrimination
 Disinclination on the part of landlords to improve their property to meet current standards.
 Do not know
 Economic development and Education
 Economic level, Ethnicity or Race, Disabled and Elderly
 economic- rent
 educating property managers about proper tenant screening techniques
 Education of rights to those affected and landlords that don't know the regulations.
 Elected officials who are more concerned about vacancies in market rate housing than in understanding the demand for affordable housing and making room for affordable housing in their communities.
 Enforceability
 Equal access to housing.
 Finance: too much emphasis on homeownership denies the reality of our workforce. Also, I'm of the opinion that it would make more economic sense to tackle permanent supportive housing as a near-future priority for the city, as well as an excellent affordable transportation system.
 financial literacy, lack of affordable housing
 High price of rental units with no fair values given to the conditions of the properties
 High rents.
 Houses (as well as many apartments) are prohibitively pricey.

Table C.2 Cont'd
What are the barriers or constraints to affirmatively furthering fair housing?

State of Louisiana
2009 Fair Housing Survey

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

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

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

Inactivity from victims; lack of education or awareness

information brokers/agents may have

Insufficient resources allocated to enforcement of fair housing laws.

Intentional racial discrimination by elected officials and the public.

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

knowledge of rights for tenants and responsibilities for landlords

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

lack of affordable housing

Lack of affordable housing

Lack of affordable housing for the low income.

lack of affordable housing; entrenched practices

lack of education

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

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

lack of law enforcement

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

Landlords who are concerned only about profit

laws are not always enforced

Limited Housing

Local fair housing agency inadequately funded, given extent of discrimination HUD not as active in enforcement locally

Discrimination against sect 8 voucher holders

Loopholes need to be closed

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

Mortgages difficult to obtain by certain races

Municipal sponsored barriers to affordable housing

Nationality

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

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

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

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

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

nimbyism admission criteria issues

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

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

Not enough education and outreach

Not enough enforcement

Not enough housing available

Only certain neighborhoods are available to low income families.

People not paying

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

Table C.2 Cont'd
What are the barriers or constraints to affirmatively furthering fair housing?

State of Louisiana
2009 Fair Housing Survey

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

Persons with criminal backgrounds

political and financial

politics, fear of minorities and blanketed racism

poverty & prejudice

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

Proper processes to insure that housing is affordable

Racists homeowners

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

Same as above

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

see answer #9

Self-Sufficiency

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

South side

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

Stigma against substance abusers and the mentally unstable

The amount of Education and income

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

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

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

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

The prejudice and ignorance about affordable housing.

The thought that it is not important and does not exist

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

There is no enforcement and in most cases, the victim has no knowledge of any recourse they have when discriminated against

There is not enough rental housing in the city of New Orleans and the surrounding area. The rental housing that does exist and is coming on-line is not affordable to people on social security disability or just plain social security benefits.

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

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

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

Uninformed participants

updated current information.

Various area of misinformation in the system

Victimizers, will not fully comply with fair housing laws.

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

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

Table C.3
Survey Results: What are the geographic areas with fair housing problems?
 State of Louisiana
 2009 Fair Housing Survey

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

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

State of Louisiana
 2009 Fair Housing Survey

My office receives more housing complaint from the north side of Lafayette.

Nearby St. Bernard Parish.

New Iberia

New Orleans East Uptown Mid-City

New Orleans East, Lakeview, parts of MidCity and Uptown

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

New Orleans East, St. Bernard and Jefferson Parishes

New Orleans metro area, and state-wide

NO East

NO East has completely succumbed to NIMBYism

North Baton Rouge

North Lafayette

Northside

ON THE WESTBANK AND METAIRIE THEIR ARE SOME FAIR HOUSING PROBLEMS

Orleans Parish, and the surrounding metro area.

orleans parish, st bernard parish, jefferson parish

Orleans, Jefferson, St Bernard Parish

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

Pick any one of the low to moderate census tracks

Pineville Housing Authority.

Primarily throughout the entire parish (NIMBY).

Proper processes to insure that housing is affordable

Property along the river front and Historical areas

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

Rural Parishes

Same as #11.

Some of the newly incorporated suburban communities

South Baton Rouge, North Baton Rouge

Southside of Lafayette

St Bernard Parish areas

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

St. Bernard and St. Tammany Parishes

St. Bernard Parish

St. Bernard PARish

St. Bernard Parish Garden District in Orleans Parish

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

St. Bernard, Jefferson Parish

St. Bernard, Jefferson, Orleans, St. Tammany

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

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

The Greater New Orleans Area.

the housing projects and east side of houma

the lower 3rd area.

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

The problem exists all over the city.

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

State of Louisiana
 2009 Fair Housing Survey

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

Table C.4
Survey Results: What are the main causes of problematic areas?

State of Louisiana
 2009 Fair Housing Survey

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

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

State of Louisiana
2009 Fair Housing Survey

Inactivity; lack of education

Individuals in the system The Laws not conducive to the area

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

Lack of advocacy

lack of available housing and misappropriation of current residents

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

Lack of community education

Lack of education and training

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

Lack of functioning enforcement mechanism.

Lack of information

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

Lack of knowledge

Lack of knowledge that the community receives

lack of knowledge, lack of interest in developing affordable housing

lack of law enforcement

Lack of public support to change

Lack of sufficient resources devoted to fair housing enforcement.

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

Lack of understanding economics, and fear

lack on information/ignorance

landlords and lack of the law being enforced

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

Landlords taking advantage of high demand

laws are not enforced

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

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

low income

money taking precedent over human rights

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

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

Negative impression of African Americans.

NIMBY and fear if the unknown.

NIMBYism

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

NIMBYism, lack of education, fear

Not enough housing available

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

not enough investigation and enforcement

Parish Government

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

State of Louisiana
2009 Fair Housing Survey

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

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

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

Poor time management

poverty & prejudice

Prejudice minds and lack of knowledge of fair housing.

Predominately black area

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

Price of housing is unaffordable.

Property owners only in for the money

race

Race and income disparities.

Race and Socioeconomic Prejudice

Racial prejudice

Racial and class discrimination

Racism and classism.

racism, classism

Racism, classism and a history of bad housing developments

Racism, fear, elitism

Racism, stereotyping

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

republican

See answer 11

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

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

So called Fair Market Rental Rates are exorbitant.

Some problems are economic prejudice and some problems are racially motivated

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

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

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

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

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

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

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

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

Too many politics and preferences given to someone they know.

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

Underserved area

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

Table C.5
Survey Results: Please cite government actions that may have adversely affected fair housing
 State of Louisiana
 2009 Fair Housing Survey

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

Above

Attempt to improve neighborhoods

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

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

City planning. Foot print of New Orleans.

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

Fair Market Values Laws

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

Giving out money to non profits with no construction background.

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

Inaction is an action

incredibly complex bureaucracy, permitting processes, etc

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

Lafayette is aware of LA Fair Housing concerns

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

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

making it harder for minority.

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

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

N/A

neglect and indifference

nothing changes in the housing market; no rent control laws

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

Policies and procedures which contradict fair housing laws.

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

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

See #11

See above regarding NIMBY notwithstanding prior confirmation of appropriate zoning.

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

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

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

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

Table C.5 Cont'd
Please cite government actions that may have adversely affected fair housing

State of Louisiana
2009 Fair Housing Survey

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

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

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

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

UNDERAPPRAISING OF PROPERTY-NO CAPITAL OUTLAY IMPROVEMENTS IN A TIMELY MANNER,
SEWERAGE,SIDEWALKS PROPER DRAINAGE AND ,ETC.

we needed more planning in the low-income areas

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

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

zoning ordinances put into effect

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

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

State of Louisiana
2009 Fair Housing Survey

All individuals are guaranteed the right to fair housing.

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

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

Dont know

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

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

HANO

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

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

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

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

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

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

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

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

Misappropriation of purchasing order and inappropriate accounting practices within HANO

N/A

New Orleans has a history of not accommodating people with disabilities

New Orleans Housing Authority has a long history of corruption

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

Table C.6 Cont'd
Please cite the fair housing non-compliance issues

State of Louisiana
 2009 Fair Housing Survey

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

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

patronage

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

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

Rather not

Reverse discrimination

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

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

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

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

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

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

Table C.7
Survey Results: Please cite the codes or regulations that may represent barriers to fair housing

State of Louisiana
 2009 Fair Housing Survey

--see previous answers... happens in most of the GNO Parishes

Allowing some landlords to charge outrageous prices for sub-standard housing.

blighted housing

Blighted Property

Check apt. complexes for accessibility.

City has suburban codes and regulations that do not work for infill projects that should have new urbanism rules ie; smaller lot size, common green area, etc.

City of Ville Platte has an ordinance which says no commercial development within 300 feet of residential development. This ordinance can be and apparently has been selectively applied.

code that address the lot size. The size restriction makes it impossible to develop them affordably.

Don't know Codes

DON'T KNOW CODES.

Enforcement

HUD's requirement that the Parish ensure rental and homeowner units comply with health and safety for the occupants is not enforced. Therefore, many households live in substandard housing thru out the Parish. Especially in area trailer parks.

I'm unsure, but I know they exist.

I've lost track of all the ordinances St. Bernard Parish has tried to pass to keep out low income individuals.

Increased costs of HDLC's compliance for redeveloping historic housing stock.

Issuance of Building Permits in Lower ninth Ward areas that were heavily minority occupied, were slower than normal

Jefferson Parish had a multifamily building condemned to avoid it being developed as a low income tax credit project. They blocked the building permit so the property could not be repaired, but then condemned it for not being repaired.

lack of enforcement for ADA and other handicap/aging housing

Landlord's maintenance of rental properties

Table C.7 Cont'd
Please cite the codes or regulations that may represent barriers to fair housing
 State of Louisiana
 2009 Fair Housing Survey

landlords not maintaining properties
 moratoria on multi-family housing

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

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

n/a

No children in upstairs apartments

no section 8 in some sections or low income housing

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

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

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

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

pricing select groups out of what was affordable areas

Prohibition against multi-family housing in Jefferson Parish

R & D is crushed by Building Codes

Rather not

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

Safety with poor infrastructures.

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

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

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

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

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

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

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

zoning

zoning laws that mandate minimum lot sizes or otherwise restrict density

Table C.8
Survey Results: Please cite policies that may represent barriers to fair housing
 State of Louisiana
 2009 Fair Housing Survey

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

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

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

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

Housing taxes are not follow through with in all districts

Table C.8 Cont'd
Please cite policies that may represent barriers to fair housing

State of Louisiana
2009 Fair Housing Survey

I would guess tax credits and how they are applied.
inadequate or non existent administrative support for the funding for construction of affordable housing
indiscriminate use of TIFS keeps support from all areas of the community, particularly residential areas
Individuals that may need housing assistance that are over the low-income tax credit guidelines have no other places to offer assistance to them
ineptitude and lack of professionalism within HANO
Insufficient funds designated to meet the needs of those who have been adversely affected.
Jefferson Parish does not allow CHDO's to submit projects anymore. WE have to wait for an RFP and it identifies the project.
Lack of knowledge
Lack of strategic, long term (3-5) housing plan, lack of coordination and leadership on housing issues, lack of funding and staffing for critical infrastructure (ORDA, NORA, Code Enforcement, etc.)
Large estates and Farmers are not taxed fairly, they pay less than residential owners of property.
LHFA financial overhead of operating their palatial office building.
Milage increased poor can't pay taxes facing possible adjudication.
MONIES GIVEN TO REBUILD 200 HOUSING UNITS AFTER THE KATRINA DISASTER WAS TAKEN BACK BECAUSE THE HOUSING WAS NEVER BUILT, LEAVING THE POOR STRUGGLING FOR AFFORABLE HOUSING. SOMEONE IN GOVERNMENT FEDERALLY OR STATE HAS DROPPED THE BALL HERE IN ALEXANDRIA BY NOT KEEPING AN EYE WHAT IS ON WHAT IS HAPPENING IN PUBLIC HOUSING.
Moratoriums and exclusionary zoning techniques
N/A
neighborhood associations forcing membership dues and imposing liens on homes
New assessment of Properties that increased taxes
no rent control law
nuisance abatement codes
parish tax office assesses the properties on the north side of I10 very low
Planning Councils refusing to sub-divide land for single family affordable housing, using planning councils to refuse re-zoning requests, moratoriums on multi-family or subdivision projects of affordable housing.
pricing
proposed legislation related to homestead exemption will unduly impact renters who frequently are minorities/women/disabled
Proposed moratoriums on multi-family. Denial of subdivisions
Reverse Discrimination
SBP enacted moratorium against multi-family housing. SBP enacted the "Blood Relative Ordinance".
see above
See above.
Some taxes in current area are extremely high
Some taxes in different areas are to high
stopping of tax credit units by certain lawmakers
Tax policy-personal experience?
THE ALLOWING OF INDUSTRY TO HAVE UNFETTERED CHOICES FOR DUMP SITES AND PLANTS WHICH DEVALUE PROPERTY AND CREATE ADVERSE HEALTH PROBLEMS.
The allowing of Industry to have unfettered choices for dumpsites and plants which DEVALUE PROPERTY, CREATE ODORS, and ADVERSE HEALTH Problem.
The code that requires copies of estimates for major trades (Plumber, Electrical, HVAC) before a permit for an addition is granted
The property taxes in Orleans Parish has gone up drastically and so has Property Insurance. These two major issues have made it virtually impossible for many low-income working people from purchasing homes.
the Road Home program has not adequately addressed small rental properties and disproportionately impacted elderly and minority homeowners
The Road Home program, flood zone policies, waivers for CDBG funding related to disaster recovery, the permissive use permit process in St. Bernard Parish

Table C.8 Cont'd
Please cite policies that may represent barriers to fair housing

State of Louisiana
 2009 Fair Housing Survey

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

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

The time it takes to process information and permits

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

unsure

What tax incentives are offered?

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

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

State of Louisiana
 2009 Fair Housing Survey

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

Additional information when individuals receive rental or homebuyer counseling

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

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

changes needs to be made to include instead of excluding minority

Compliance must be enforced with monitoring and accountability

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

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

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

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

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

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

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

law should prohibit discrimination on the basis of source of income

Make income source discrimination illegal.

More equitable

More teeth must be placed into law.

need to be enforced

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

Probably not changed, but fairly enforced.

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

State of Louisiana
2009 Fair Housing Survey

Proper tax assessing needs to be adhere to in all communities
rent control
should do more to promote rights of protected classes, eg persons living w/ HIV/AIDS
stricter housing laws for landlords
taxes
there is still some racial profiling and this needs to stop-education is seriously needed
There needs to be investigation into employees and residents of public housing.
They need to be enforced.
to include persons with criminal backgrounds
To meet the needs of our community
To meet the needs of our community.
To prevent discrimination based on source of income.
To the need of the community
Violate rights of private ownership

Table C.10

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

State of Louisiana
2009 Fair Housing Survey

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

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

Good survey to make people aware of Fair Housing Laws.

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

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

I would love a face to face meeting with decision makers

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

Lack of knowledge

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

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

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

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

Our local Fair Housing Office in New Orleans does an excellent job in educating the community through its outreach programs.

Reaching out to local communities, including smaller municipalities, would be helpful.

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

State of Louisiana
2009 Fair Housing Survey

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

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

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

Thank you for your work.

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

Thanks for taking the time to administer this survey.

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

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

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

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

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

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

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

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

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

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

We would make great strides if current laws were implemented

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

APPENDIX D. PUBLIC OUTREACH

THE 2009 LOUISIANA FAIR HOUSING FORUMS

Sponsored by the Louisiana Office of Community Development

You are invited to attend!

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

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

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

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

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

Monday, Nov 16

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

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

*For anyone in need
of special
accommodations,
please provide
advance notice by
contacting the above
contact persons*

City of Slidell
4:00 pm, Monday
Slidell City Council
Chambers
1330 Bayou Lane
Trailer #110
Ms. Marina Stevens
985-646-3879

Tuesday, Nov 17

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

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

Wednesday, Nov 18

City of Lake Charles
9:00 am, Wednesday
Council Chambers
326 Pujoe Street
1st Floor
Ms. Esther Vincent
337-491-1465

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

Thursday, Nov 19

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

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

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



APPENDIX E. GLOSSARY

Americans with Disabilities Act

Established in 1990 and offers protection from discrimination for persons with disabilities.

Consolidated Plan

The Consolidated Plan services four separate, but integrated functions as: a planning document for the jurisdiction which builds on a participatory process with residents; an application for federal funds under HUD's formula grant programs which are: CDBG, HOME, ESG, HOPWA; a three- to five-year strategy to be followed in carrying out HUD programs; and lastly, an action plan describing individuals activities to be implemented.

Cost Burden

Relates to persons who spend more than 30.0 percent of their income on housing and housing related costs.

Denial Rate

The rate at which loans are rejected; in this report refers to mortgage lending activity.

Disproportionate Share

A geographic region is said to have a disproportionate share of a population when that population comprises more than 10 percentage points of jurisdiction average.

Entitlement Area

An underlying formula governing the allocation of Block Grant funds to eligible recipients. Entitlement grants are provided to larger urban cities (i.e. population greater than 50,000) and larger urban counties (greater than 200,000).

Fair Housing Act

Refers to Title VIII of the 1968 Civil Rights Act, which made it illegal to discriminate in the buying, selling or renting of housing based on a person's race, color, religion or national origin.

Fair Housing Assistance Program

An agency or organization that operates on a substantially equivalent level as a federal agency and is contracted to process housing complaints.

Fair Housing Initiative Program

An agency or organization that receives federal grant money in exchange for offering fair housing services, such as education and outreach or testing.

Financial Literacy

In this report, refers to understanding of the mortgage lending industry and its practices, including high interest rate loans and credit history.

High Annual Percentage Rate Loans

Loans that are more than three percentage points for home purchases when contrasted with comparable treasure instruments or five percentage points for refinance loans.

Home Mortgage Disclosure Act

Enacted in 1975 and established that financial agencies are required to publicly disclose the race, sex, and income of mortgage applicants and borrowers by census tract.

Housing Amendments Act

Extended protections of the Fair Housing Act to include familial status and disability.

NIMBY

An acronym for Not In My Backyard; example: resistance to development of projects such as low-income housing or airports in local areas.

Non-entitlement Area

Geographic areas that are not considered Entitlement Areas in the distribution of Block Grant funds.

Tenure

Refers to status of housing in terms of being occupied or unoccupied, can be further classified by being occupied by renters or owners.

Predatory Lending

In this report, refers to origination of high annual percentage rate loans, or loans that are more than three percentage points for home purchases when contrasted with comparable treasure instruments or five percentage points for refinance loans.

Protected Class

Groups of persons protected by law in fair housing transactions.

Reasonable Accommodation

A modification or change in terms or property to accommodate a person with disabilities; example: installing a ramp for a person in a wheelchair or allowing a service animal to reside in an apartment complex that otherwise does not accept animals.