



City of Tulsa, Oklahoma

2020 Analysis of Impediments to Fair Housing Choice

May 2020



CITY OF
Tulsa
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EQUAL HOUSING
OPPORTUNITY

HAS YOUR RIGHT TO FAIR HOUSING BEEN VIOLATED?

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

Office of Fair Housing and Equal Opportunity
U.S. Department of Housing and Urban Development
451 Seventh Street SW, Room 5204
Washington, DC 20410-2000
Telephone: (202) 708-1112
Toll Free: (800) 669-9777
Website: <http://www.HUD.gov/offices/fheo/online-complaint.cfm>

Oklahoma Attorney General's Office
Office of Civil Rights Enforcement
15 W. 6th Street, Suite 1000
Tulsa, Okla. 74119
Office: (918) 581-2342
Fax: (918) 938-6348
Email: ocre.complaints@oag.ok.gov
Website: <http://www.oag.ok.gov/civil-rights-enforcement-unit>
Complaint Forms: <http://oag.publishpath.com/Default.aspx?shortcut=civil-rights-enforcement-complaint-forms>

City of Tulsa – Mayor's Office of Resilience and Equity
City Hall
175 East 2nd Street 15th Floor
Tulsa, Oklahoma 74103
Office: (918) 596-7818
Email: Resilient@cityoftulsa.org

Metropolitan Fair Housing Council of Oklahoma, Inc.
312 Northeast 28th Street, Suite 112
Oklahoma City, OK 73105
Toll Free: 1-866-677-7541
Local: (405) 232-3247
FAX: (405) 232-5119

Legal Aid Services, Tulsa Law Office
907 South Detroit Avenue, Suite 725
Tulsa, Oklahoma
Telephone: (918) 584-3338 or 1 (800) 299-3338
Fax: (918) 584-3060

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EXECUTIVE SUMMARY

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

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

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

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

The list of protected classes included in the above definition is drawn from the federal Fair Housing Act, which was first enacted in 1968. However, state and local governments may enact fair housing laws that extend protection to other groups, and the AI is expected to address housing choice for these additional protected classes as well. The AI process involves a thorough examination of a variety of sources related to housing, the fair housing delivery system, and housing transactions, particularly for persons who are protected under fair housing law. The development of an AI also includes public input and review via direct contact with stakeholders, public meetings to collect input from citizens and interested parties, distribution of draft reports for citizen review, and formal presentations of findings and impediments, along with actions to overcome the identified impediments.

METHODOLOGY

As part of the consolidated planning process, and as a requirement for receiving HUD formula grant funding, the City of Tulsa is undertaking this update to the 2015 AI to evaluate impediments to fair housing choice within the city. Residents of the City of Tulsa are protected from discrimination in housing choice by the federal Fair Housing Act, which includes protections based on race, color, religion, national origin, sex, disability, and familial status. In addition, the State of Oklahoma extends protections on all of these bases and extends additional protection based on age. Finally, §5-104 of the Tulsa Code of Ordinances prohibits discrimination on all of the bases recognized under the FHA, and extends additional protections based on ancestry and marital status. The ordinance also protects against discrimination in housing based on gender identity and sexual orientation. The purpose of this report is to determine current impediments to fair housing choice at work in City of Tulsa and to suggest actions that the local community can consider in order to overcome the identified impediments. Thus, this report represents only the first step in the three-part certification process. This AI was conducted through the assessment of a number of quantitative and qualitative sources. Quantitative sources used in analyzing fair housing choice in the City of Tulsa included:

- Socio-economic and housing data from the U.S. Census Bureau,
- Employment data from the U.S. Bureau of Labor Statistics,

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

Qualitative research included evaluation of relevant existing fair housing research and fair housing legal cases. Additionally, this research included the evaluation of information gathered from several public input opportunities conducted in relation to this AI.

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

OVERVIEW OF FINDINGS

This AI includes a review of both public and private sector housing market contexts in the City of Tulsa to identify practices or conditions that may operate to limit fair housing choice in the city. Below is a summary of findings. A detailed discussion of the findings appears in Section IX.

POPULATION

- Tulsa's overall population growth remains steady.
- Tulsa's population is aging.
- Asians and Hispanics are the fastest growing demographic in Tulsa.
- The city appears to be deconcentrating when it comes to race.

POVERTY

- The poverty rate in the City has gone up for all age groups except for 65 years old and older.
- Poverty is heavily concentrated in the northwest corner of the City, which has the largest Black populations.
- The southern areas of Tulsa have a much higher percentage of people with a Bachelor's degree or higher.
- While the number of higher income earning groups is increasing in the City, there remains a significant number of households earning lower incomes.
- Meeting basic needs appears to be a problem for many residents.

DISABILITY

- In Tulsa, there are nearly 60,000 total residents with a disability, making up 14.8% of the population.
- Fair Housing Complaints are most likely to cite disability as a basis for the claim with a focus on reasonable accommodations.
- Community outreach indicated housing for seniors and the physically disabled was in the highest demand.

HOUSING

- Tulsa's overall housing stock is slightly shrinking, but the number of rental units is growing.
- The number of vacant units in the City grew by approximately 2,000 units and currently makes up 12.2% of the housing units.
- Renters, by far, face being cost burdened more than any other group.
- Survey results revealed that the most common housing and neighborhood concern is the condition of housing.

LENDING

- The percentage of loan application denials for traditional home purchase loans for one-to-four family housing in Tulsa varies by race/ethnic groups.
- High Income Blacks (having greater than 120 of Area Median Income) were nearly just as likely to be denied for a single family home purchase, at 8 percent, than Low Income Whites (having less than 80 percent of Area Media Income), at 9 percent.
- Denial reasons differ by Race/Ethnicity.
- Blacks and Hispanics are twice as likely to receive a subprime loan, at 12 percent, than Whites, at 6 percent, as of 2017.

FAIR HOUSING

- Race/Ethnicity was the most common fair housing concern noted in survey responses.
- Fair Housing Complaints are most likely to cite disability as a basis for the claim with a focus on reasonable accommodations.
- According to survey results, the City's residents are not well educated on fair housing issues.
- Tulsa is ranked 11th in the nation for evictions.
- The City has amended its City Ordinance to include additional housing protections for individuals based upon their sexual orientations and gender identities, but more work is needed.
- Stability and wellbeing of residents creates better opportunities for communities overall, and community outreach indicated a need to better address critical needs.

IMPEDIMENTS AND ACTIONS

Based on these findings, the following list of impediments and recommended Actions have been identified. A detailed discussion of these impediments and actions appears in Section X.

Impediments

Impediment #1 *Lack of knowledge of fair housing laws and fair housing resources among the general public, housing providers and policy makers*

- The general public often does not understand fair housing rights or the fair housing complaint processes;
- Fair housing opportunities are not readily available to residents with limited English proficiency.

Impediment #2 *Disproportionate Housing Problems for Minorities and Special Needs Populations*

- Substandard housing is an issue in low income and minority communities;
- Accessible and affordable housing choices for persons with disabilities and the elderly may not be keeping pace with demand;
- Tulsa's landlord friendly eviction process is more likely to affect vulnerable populations such as low income families, people with disabilities, and people with limited English proficiency.
- Access to lending opportunities to purchase homes is limited for low income and minority populations.

Impediment #3 *Economic barriers due to limited supply of adequate and accessible affordable housing*

- High costs, especially for extremely low- and very low- income renters who face significant affordability "gaps";
- High vacancy rates and substandard housing in areas of the city that are "affordable" leave limited options for low- and very low-income renters.

Impediment #4 *Lack of access to transportation options reducing housing and economic opportunities*

- Areas of the city that are outside major corridors struggle with access to public transportation;
- Lack of access impedes residents' ability to efficiently get to job centers, educational opportunities, and services for basic needs such as health care and grocery stores; and
- People with disabilities and the elderly have greater challenges in finding accessible transportation.

Actions

Action #1 *Address Lack of Knowledge of Fair Housing*

- Support fair housing training and education opportunities throughout the City, specifically for rental properties that will be directed to housing service providers, management companies, and rental residents.
- Ensure training opportunities for rental residents include information on the Oklahoma Landlord Tenant Act to clearly inform this population on their rights and responsibilities. Ensure these trainings are offered in English and Spanish.

Action #2 *Address Disproportionate Housing Problems and Economic Barriers*

- Coordinate clearance and demolition efforts with homeowner rehabilitation and single-family housing development to improve neighborhoods that currently have a high percentage of vacant and abandoned properties.
- During the grant allocation process give special consideration to rental housing development which includes at least 10% accessible units and single-family housing which includes universal design.
- Provide homebuyer education using HUD approved counselors. Ensure training is available in Spanish and English.

Action #3 *Address Lack of Access to Transportation Options Reducing Housing and Economic Opportunities*

The implementation of a Bus Rapid Transit (BRT) system, branded AERO BRT, will provide enhanced bus service in two key corridors of the city by reducing travel times and providing a high level of passenger amenities. These high-capacity transit lines will connect people to jobs and other major destinations in the City. The BRT system will operate 7 days a week every 15 minutes weekdays and 20-30 minutes on weekends. The first BRT route will run north and south along Peoria Avenue from 54th Street North to 81st Street South. The second corridor will run east and west from downtown along 11th Street corridor out to 145th East Ave.

SECTION I. INTRODUCTION

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

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

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

WHY ASSESS FAIR HOUSING?

Provisions to affirmatively further fair housing are long-standing components of the U.S. Department of Housing and Urban Development's (HUD's) housing and community development programs. These provisions come from Section 808(e) (5) of the federal Fair Housing Act, which requires that the Secretary of HUD administer federal housing and urban development programs in a manner that affirmatively furthers fair housing. In 1994, HUD published a rule consolidating plans for housing and community development programs into a single planning process. This action grouped the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grants (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) programs into the Consolidated Plan for Housing and Community Development, which then created a single application cycle.

As a part of the consolidated planning process, states and entitlement communities that receive such funds as a formula allocation directly from HUD are required to submit to HUD certification that they are affirmatively furthering fair housing. The AFFH certification process has three parts:

- 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.

In the Fair Housing Planning Guide, page 2-8, HUD notes that impediments to fair housing choice are:

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

State and local governments may enact fair housing laws that extend protection to other groups as well. For example, §25-1451 through §25-1508 of Oklahoma State Law prohibits discrimination in the provision of housing on all of the bases recognized in the federal FHA, and extends additional protection based on age. Similarly, §5-104 of the Tulsa Code of Ordinances prohibits discrimination on all of the bases

recognized under the FHA, and extends additional protections based on ancestry and marital status. The ordinance also protects against discrimination in housing based on gender identity and sexual orientation. A comparison of protected class designations by federal and city law is presented below.

Comparison of Fair Housing Laws

Protected Group	Federal Fair Housing Act	Oklahoma Fair Housing Law	City of Tulsa Ordinance
Race	X	X	X
Color	X	X	X
Religion	X	X	X
Sex	X	X	X
Familial Status	X	X	X
National Origin	X	X	X
Disability	X	X	X
Age		X	
Ancestry			X
Marital Status			X
Gender Identity (Housing)			X
Sexual Orientation (Housing)			X

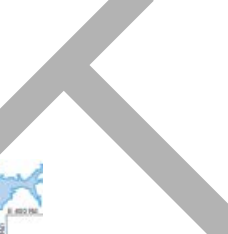
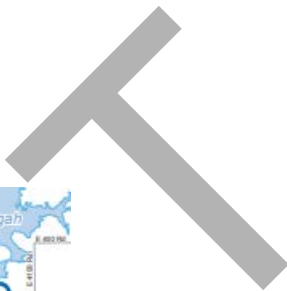
As discussed above, fair housing protections at the federal level do not include consideration of income and do not address housing affordability outside the context of housing discrimination. While lack of affordable housing can be a significant concern to policymakers, it is not, on its own, a fair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

PURPOSE OF THIS RESEARCH

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

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

The objective of this AI update was to research, analyze, and identify prospective impediments to fair housing choice throughout the city. The goal of the completed AI is to suggest actions that the sponsoring jurisdictions can consider when working toward eliminating or mitigating the identified impediments.



SECTION II. PAST IMPEDIMENTS

The chart below summarizes the impediments and recommended actions detailed in the City's 2015 Analysis of Impediments to Fair Housing and describes the Actions taken by the City to address them.

2015 Impediment	Recommended Action Step	Progress Notes
PRIVATE SECTOR		
Impediment 1: More frequent denial of home purchase loans to black, Hispanic, and female loan applicants.	Action 1.1: Enhance outreach activities for prospective homebuyers. Measurable Objective 1.1: The number of outreach activities taken	PY15 – Metropolitan Tulsa Urban League was awarded CDBG funds for Housing Counseling, but the agency had organizational issues and was dissolved. The City did not fund any specific Housing Counseling Program during this program year. PY16 through PY18 – Housing Partners of Tulsa, a Certified HUD Housing Counseling Agency, used CDBG funds to conduct a Housing Counseling Program which served 521 participants with 315 individuals participating in one-on-one budget/credit counseling sessions. PY16 through PY18 - Housing Partners of Tulsa offered Homebuyer Education and Counseling in conjunction with the HOME-funded First-Time Homebuyer Program. There were 71 Homebuyer Education Classes conducted during the past three program years. This resulted in 484 individuals attending homebuyer education classes. During PY17 a bilingual housing counselor was added to the HPT staff.
	Action 1.2: Enhance homebuyer classes making buyers aware of high denial rate histories. Measurable Objective 1.2: The number of enhanced classes given	PY16 through PY18 - Housing Partners of Tulsa conducted 71 Homebuyer Education Classes in conjunction with the HOME-funded First-Time Homebuyer Program. Classes included information on mortgage financing and choosing a lender. Those also opting to participate in the counseling portion of the program were provided many resources and advice on personal finances. Homebuyer Education Certificates were awarded to 174 participants.
Impediment 2: Apparent predatory lending falls more heavily on black and Hispanic borrowers.	Action 2.1: Enhance outreach activities for prospective homebuyers.	PY16 through PY18 - Housing Partners of Tulsa offered 71 Homebuyer Education Classes in conjunction with the HOME-funded First-Time Homebuyer Program. During PY17 a bilingual housing counselor was added to the HPT staff.

	Measurable Objective 2.1: The number of outreach activities taken	
	Action 2.2: Enhance homebuyer classes making buyers more aware of predatory lending rates, the attributes of predatory loans, and the reasons for staying clear of predatory loans. Measurable Objective 2.2: The number of enhanced classes given.	PY16 through PY18 - Housing Partners of Tulsa offered 71 Homebuyer Education Classes in conjunction with the HOME-funded First-Time Homebuyer Program. Classes included information on financing and choosing a lender. Those also opting to participate in the counseling portion of the program were provided many resources and advice on personal finances. Homebuyer Education Certificates were awarded to 174 participants.
Impediment 3: Discriminatory terms, conditions, privileges, or facilities relating to rental, and refusal to rent.	Action 3.1: Enhance training to program managers so that they can advise clients of unlawful activities. Measurable Objective 3.1: The number of trainings enhanced per year	PY15 through PY18 - The City was a partner agency in the Tulsa Fair Area Housing Partnership education efforts conducted during September each year to offer Landlord Fair Housing Training. A total of 5 trainings have been held. In addition, the City's Working in Neighborhoods Department staff participates as a presenter during the Health Department's Housing 101 Training offered twice each year, which includes OK Landlord Tenant Law. A total of 8 trainings have been held.
	Action 3.2: Enhance outreach and education for housing providers, such as property management associations and landlords. Measurable Objective 3.2: The number of outreach and education activities taken per year Executive Summary 2015 City of Tulsa Final Report Analysis of Impediments to	PY15 through PY18 - The City was a partner agency in the Tulsa Fair Area Housing Partnership education efforts conducted during September each year to offer Landlord Fair Housing Training. A total of 5 trainings have been held. In addition, the City's Working in Neighborhoods Department staff participates as a presenter during the Health Department's Housing 101 Training offered twice each year, which includes OK Landlord Tenant Law. A total of 8 trainings have been held.

	Fair Housing Choice 9 March 20, 2015	
Impediment 4: Failure to make reasonable accommodation or modification.	<p>Action 4.1: Enhance training to program managers so that they can advise clients of unlawful practices and advise owners of rental property that they are required to allow reasonable modification or accommodation for the disabled.</p> <p>Measurable Objective 4.1: The number of trainings to program managers that were enhanced per year</p>	PY15 through PY18 - The City was a partner agency in the Tulsa Fair Area Housing Partnership education efforts conducted during September each year to offer Landlord Fair Housing Training. Training included reasonable accommodation as well as service and assistance animals. A total of 5 trainings have been held.
Impediment 5: Steering and redlining appears in Tulsa.	<p>Action 5.1: Verify testing is performed to uncover the degree of steering and redlining that appears to be occurring in the city.</p> <p>Measurable Objective 5.1: Number of tests or other alleged steering and redlining issues reported by local non-profits and other organizations.</p>	<p>Fair Housing Testing was conducted by Legal Aid Services of Oklahoma in 2015-2016.</p> <p>Results:</p> <p>Sales test based upon race – 4 tests; all reported as inconclusive</p> <p>Insurance test based upon disability in the rental context - 2 tests; both affirmative</p>
Impediment 6: Insufficient understanding of Fair Housing laws.	Action 6.1: Enhance the outreach and education of fair housing laws for the providers of housing throughout the city in partnership with the Tulsa	The City was a partner agency in the Tulsa Fair Area Housing Partnership education efforts conducted during April and/or May each year to celebrate Fair Housing Month. There were 4 events conducted, one each year from 2015 through 2018. Staff from the Human Rights Department were directly involved in the organization's leadership and efforts. With staff reductions in

	Human Rights Department and Human Rights Commission Executive Summary 2015 City of Tulsa Final Report Analysis of Impediments to Fair Housing Choice 10 March 20, 2015 Measurable Objective 6.1: The number of outreach and education activities taken to enhance education of fair housing laws Public Sector Impediments, Suggested Actions, and Measurable Objectives	2016 and reorganization of the Department in 2017 direct involvement was ended.
PUBLIC SECTOR		
Impediment 1: Insufficient understanding of Fair Housing laws.	Action 1.1: Enhance outreach and education to consumers through tailored outreach to selected members of the community. Measurable Objective 1.1: The number of attempts and scheduled outreach and education activities taken for selected members of the community	PY18 - The City's Working in Neighborhoods Department participated in the Tulsa Fair Area Housing Partnership education efforts conducted during April to reach out to renter and homeowner populations. PY15 through PY18 - Legal Aid Services of Oklahoma used CDBG or ESG funds to operate a Legal Assistance Program to homeless individuals at various partner agency facilities. Legal services included assistance with eviction cases to 285 persons.
	Action 1.2: Work to revise the city's fair housing ordinance for clarity and functionality Measurable Objective 1.2: Documented efforts to update the City's Fair Housing (Title 5) Ordinance to include	A staff member from the Department of Human Rights of the City of Tulsa was instrumental in establishing a City Fair Housing Committee which reports to the Human Rights Commission. During PY15 the Fair Housing Ordinance in the City of Tulsa was amended to include additional protected classes for sexual orientation or gender identity. (Ordinance #23280 Section 104 "Discrimination in housing prohibited"). After this was finalized, grants staff ensured that all HOME-funded rental developments updated their

	protection for individuals with respect to sexual orientation and gender identity.	policies and related application information and disclosures to include these additional protected classes during the annual monitoring process.
Impediment 2: Concentrations of assisted housing exist in Tulsa.	Action 2.1: Determine new areas or new redevelopment options so that such concentrations do not appear in Tulsa. Measurable Objective 2.1: Areas identified for new development options for small-scale assisted housing	The City includes information in the RFP Workshops and in meetings with housing development partners to encourage development in parts of the city where affordable housing does not exist.
	Action 2.2: Encourage development of such options in the newly designated areas. Measurable Objective 2.2: The number of housing units contained in applications for acquisition or construction projects in these new areas	PY15 – Two projects were funded; a rehabilitation in mid-town (24 units) and funding for a new construction Sr. Development project in far North Tulsa (56 units) PY16 – One rehabilitation project was funded in downtown Tulsa (31 units). PY17 – Four projects were funded; 2 rehabilitations, one in mid-town (16 units) and one in south Tulsa (48 units) and two CHDO new construction Sr. Development projects in the Kendall Whittier Neighborhood (6 units / 40 units) PY18 – No housing development projects were funded (0 units) PY19 – Two projects were funded; a rehabilitation in east mid-town (280 units) and additional funding for a CHDO new construction Sr. Development project in the Kendall Whittier Neighborhood from PY17 (40 affordable units)
	Action 2.3: Present or provide access to AI findings to the Tulsa City Council and public. Measurable Objective 2.3: Record of presentations and information postings.	All AI findings have been provided to the Tulsa City Council and posted on the City's website for public access.

<p>Impediment 3: NIMBYism; multi-family housing discouraged.</p>	<p>Action 3.1: Work to locate multifamily housing in areas where it does not now exist. Measurable Objective 3.1: Document meetings, memos, and other correspondence with regard to land use decisions.</p>	<p>Updates to the Zoning Code came into effect on January 1, 2016 and includes:</p> <ul style="list-style-type: none"> - A single-family zoning district (RS-5) that allows affordable housing types and also the co-mingling of certain, previously segregated single-family and multi-family residential building types. - A mixed-use zoning district that will allow the creation of new owner and rental housing in close proximity to jobs, goods, and services. - Promotion of new affordable, single-family and multi-family residential building types that have been overlooked locally, including: cottage houses, patio houses, and multi-unit houses. <p>Tulsa Planning Office has currently drafted an amendment to the Zoning Code to allow Accessory Dwelling Units (ADUs). This will allow for accessory units to a primary residence either for an extended family member or an affordable rental unit. Pending approval by Planning Commission and City Council, this change to the Zoning Code should be in place by the end of 2019.</p> <p>HOME-funded multi-family housing projects over the past several program periods have funded projects in various locations throughout the city, including Altamont in downtown Tulsa (PY16), Indianapolis (PY16 and Ranch Acres (PY15) in mid-town Tulsa, and senior housing Whittier Villas and Whittier Heights (PY16/PY18/PY19) in the Kendall-Whittier neighborhood just to the east of downtown Tulsa, which currently includes no low-income housing developments specifically for seniors.</p>
<p>Impediment 4: Zoning works against affordable housing.</p>	<p>Action 4.1: Add elements to the zoning code that might allow more or new opportunities higher density, mixed income multifamily housing. Measurable Objective 4.1: Identify zoning codes that need modification.</p>	<p>Updates to the Zoning Code came into effect on January 1, 2016 and includes:</p> <ul style="list-style-type: none"> - A single-family zoning district (RS-5) that allows affordable housing types and also the co-mingling of certain, previously segregated single-family and multi-family residential building types. - A mixed-use zoning district that will allow the creation of new owner and rental housing in close proximity to jobs, goods, and services. - Promotion of new affordable, single-family and multi-family residential building types that have been overlooked locally, including: cottage houses, patio houses, and multi-unit houses.

	Measurable Objective 4.2: Number of attempts to change zoning codes.	Tulsa Planning Office has currently drafted an amendment to the Zoning Code to allow Accessory Dwelling Units (ADUs). This will allow for accessory units to a primary residence either for an extended family member or an affordable rental unit. Pending approval by Planning Commission and City Council, this change to the Zoning Code should be in place by the end of 2019.
Impediment 5: Inadequate code enforcement for some areas.	Action 5.1: Work to make code enforcement more uniform throughout the City. Measurable Objective 5.1: Document the number of attempts to increase funding for this purpose.	CDBG funds are designated to address code enforcement efforts in designated blighted areas or on a spot basis throughout the City in LMI census tracts. Yearly allocations for these efforts ranged from \$325,000 in PY15 to \$500,000 in PY18.
	Action 5.2: Working with the Working in Neighborhood Department, determine sequence of work and where such code enforcement might better be addressed. Measurable Objective 5.2: Number of contacts with the Working in Neighborhood Department.	CDBG funds are designated to address code enforcement efforts in designated blighted areas or on a spot basis throughout the City in LMI census tracts. Emphasis on addressing properties in newly designated area just north of downtown, the Crutchfield Neighborhood was made in PY17. Monthly contacts with the Working in Neighborhood Department were made to discuss progress, especially in the Crutchfield Neighborhood.
Impediment 6: Lack of a sufficient public transit system.	Action 6.1: This is a well-documented need; nevertheless, addressing it may be beyond the scope of Grants Administration. Measurable Objective 6.1: Document efforts made by the	Several years ago, the City of Tulsa recognized the need to provide a more frequent reliable transportation option for local residents and began examining how a Bus Rapid Transit system (BRT) could be adopted in Tulsa. BRT is designed to provide enhanced bus service in key corridors by reducing travel times and providing a high level of passenger amenities. The BRT system in Tulsa, branded as AERO BRT, will operate 7 days a week every 15 minutes weekdays and 20-30 minutes on weekends. The BRT system will run north and south along Peoria Avenue from 54th Street North to 81st Street

	City of Tulsa to address this need.	<p>South. This high-capacity transit line will connect people to jobs and other major destinations. One in seven of the city's residents and 20% of jobs are within a 10-minute walk of the corridor. The city is spending approximately \$20 million in Improve Our Tulsa and Vision Tulsa funds to pay for the buses, bus stations and other capital needs. Infrastructure for the bus stations is underway and implementation of the BRT is slated for late 2019 or early 2020.</p> <p>Another such line running east and west from downtown along 11th Street corridor out to 145th East Ave is slated to be added and funding for it is included in the next round of Improve Our Tulsa II projects.</p>
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SECTION III. SOCIO-ECONOMIC CONTEXT

This section of the analysis provides demographic, economic, and housing information about the City of Tulsa. Sources for this data include the U.S. Census Bureau's American Community Survey and Building Permits Survey, the Bureau of Economic Analysis, the Bureau of Labor Statistics, the 2018 Gallup-Tulsa Citivoice Index Results, and other sources. A wide range of socio-economic characteristics were analyzed. When possible, this data was mapped at the Census Tract level to allow for further analysis based on geography. Evaluating the differences between parts of the City is vital to preventing and addressing any concentrated populations or segregation, particularly when the defining factor is economic, racial, or ethnic. The purpose of this section is to provide an understanding of the conditions in Tulsa in order to allow for the development of meaningful and realistic solutions.

DEMOGRAPHICS

The City of Tulsa is a diverse place with significant representation by many racial and ethnic groups. There are areas with large Black, Asian, and Hispanic/Latin populations where non-White residents make up the majority. There are communities in which many households speak languages other than English at home. These realities are important to understand in order to address the needs of the City. Often communities of color are underrepresented in the decision-making process, particularly when economic opportunities are correlated with race or ethnicity.

The following sections will show the current population based on age, race/ethnicity, disability status, and veteran status. The data show that Tulsa appears to have distinct neighborhoods where particular races or ethnicities tend to live; this may point to issues that need to be addressed. However, the data also show that progress has been made in the last 10 years and that the population is becoming more integrated. While it is important to honestly look at the dynamics of the City it is also important to recognize the progress that has been made so that previously successful actions can be continued.

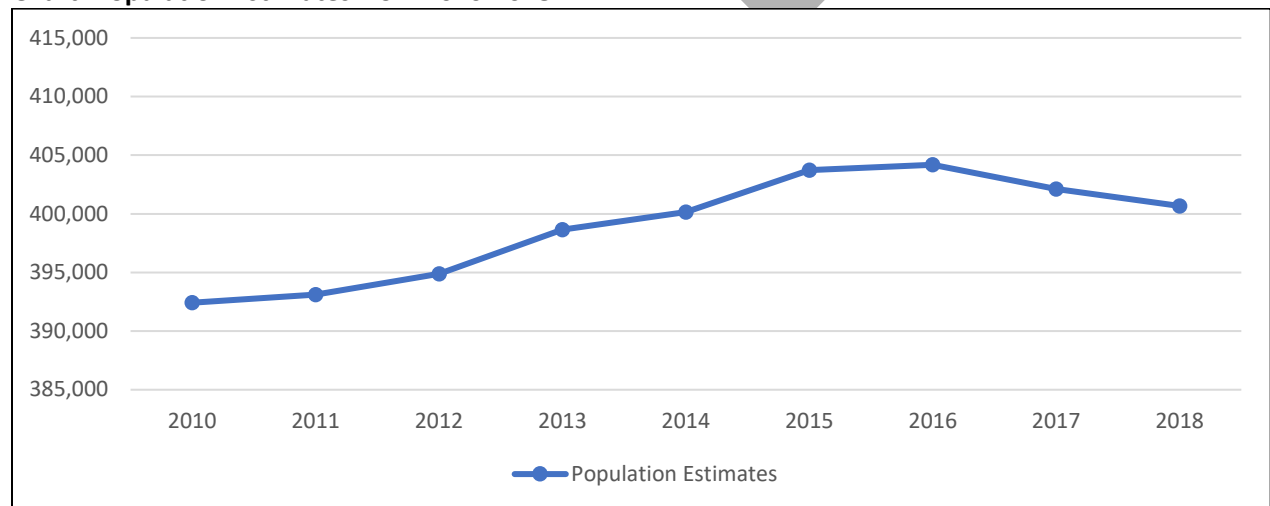
Population

Between 2000 and 2017 the population of Tulsa has grown by 8,303 people, which is 2% growth. This growth all occurred since 2010; prior to that the population had decreased slightly. This is in contrast to the statewide population change which grew by 8.7% between 2000 and 2010, and by 3.9% between 2010 and 2017.

Table: Population Change					
	2000	2010	2017	Percent Change 2000-2010	Percent Change 2010-2017
Tulsa	393,049	391,906	401,352	-0.3%	2.4%
Oklahoma (state)	3,450,654	3,751,351	3,896,251	8.7%	3.9%
Source: 2000 Census (SF1), 2010 Census (SF3), 2013-2017 ACS 5-Year Estimates					

The following chart demonstrates the change in population annually between 2010 and 2018. Between 2010 and 2016 the population grew steadily, but then began declining. The 2018 estimate is 400,669, which is approximately 3,500 less than the 2016 high of 404,182.

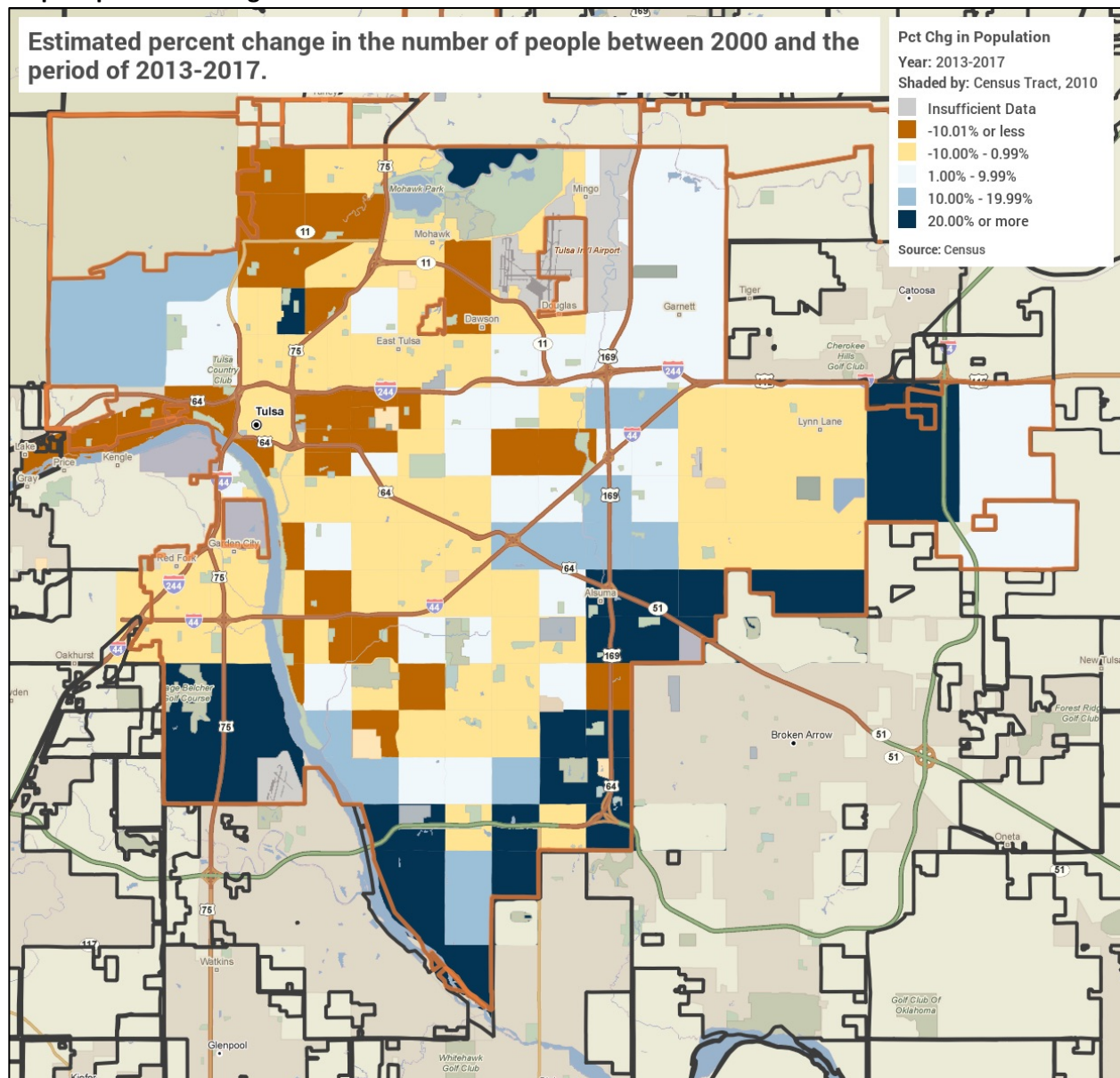
Chart: Population Estimates from 2010-2018



Source: Annual Population Estimates as of July 1 (PEPANNRES)

The change in the City's population has not been geographically uniform. Many census tracts lost over 10% of their population since 2000 while others grew by 20% or more. In general, it appears tracts in the west and north parts of the City saw population loss while those on the outskirts to the east and south saw the most growth. The reason for this is likely complicated but may be related to the location of affordable housing, economic opportunities, and transportation options.

Map: Population Change in Tulsa from 2000 to 2017



Source: 2000 Census, 2013-2017 ACS via PolicyMap

Population by Age

Most communities throughout the U.S. are beginning to deal with a population that is getting older, on average. Tulsa appears to be trending in the other direction with a younger median age now than in 2010. However, the two age groups that saw the greatest growth in representation are the 60 to 64 and 65 to 74 years old. The two groups that decreased by the largest percentage of representation are the 75 to 84 and 45 to 54 years old demographic. It is difficult to identify any clear pattern, but it appears working-age adults in the middle of their working years (35 to 54 years old), older children and college age adults (15 to 24 years old) are leaving the area while older working age adults and retirees are moving in.

Table: Population by Age					
Age	2010		2017		% Change from 2010-2017
	Population	Percent	Population	Percent	
Under 5 years	29,096	7.5%	29,062	7.2%	-4.0%
5 to 9 years	26,437	6.8%	28,169	7.0%	2.9%
10 to 14 years	23,860	6.1%	26,607	6.6%	8.2%
15 to 19 years	26,788	6.9%	24,788	6.2%	-10.1%
20 to 24 years	30,806	7.9%	30,184	7.5%	-5.1%
25 to 34 years	56,653	14.6%	62,186	15.5%	6.2%
35 to 44 years	49,301	12.7%	49,206	12.3%	-3.2%
45 to 54 years	53,740	13.8%	48,014	12.0%	-13.0%
55 to 59 years	23,969	6.2%	26,211	6.5%	4.8%
60 to 64 years	18,624	4.8%	23,045	5.7%	18.8%
65 to 74 years	24,063	6.2%	30,475	7.6%	22.6%
75 to 84 years	17,711	4.6%	15,753	3.9%	-15.2%
85 years and over	7,199	1.9%	7,652	1.9%	0.0%
Median Age	35.1	--	34.9	--	--
Source: 2006-2010 ACS (DP05), 2013-2017 ACS (DP05)					
Data note: % change is by change in percentage.					

Population by Race and Ethnicity

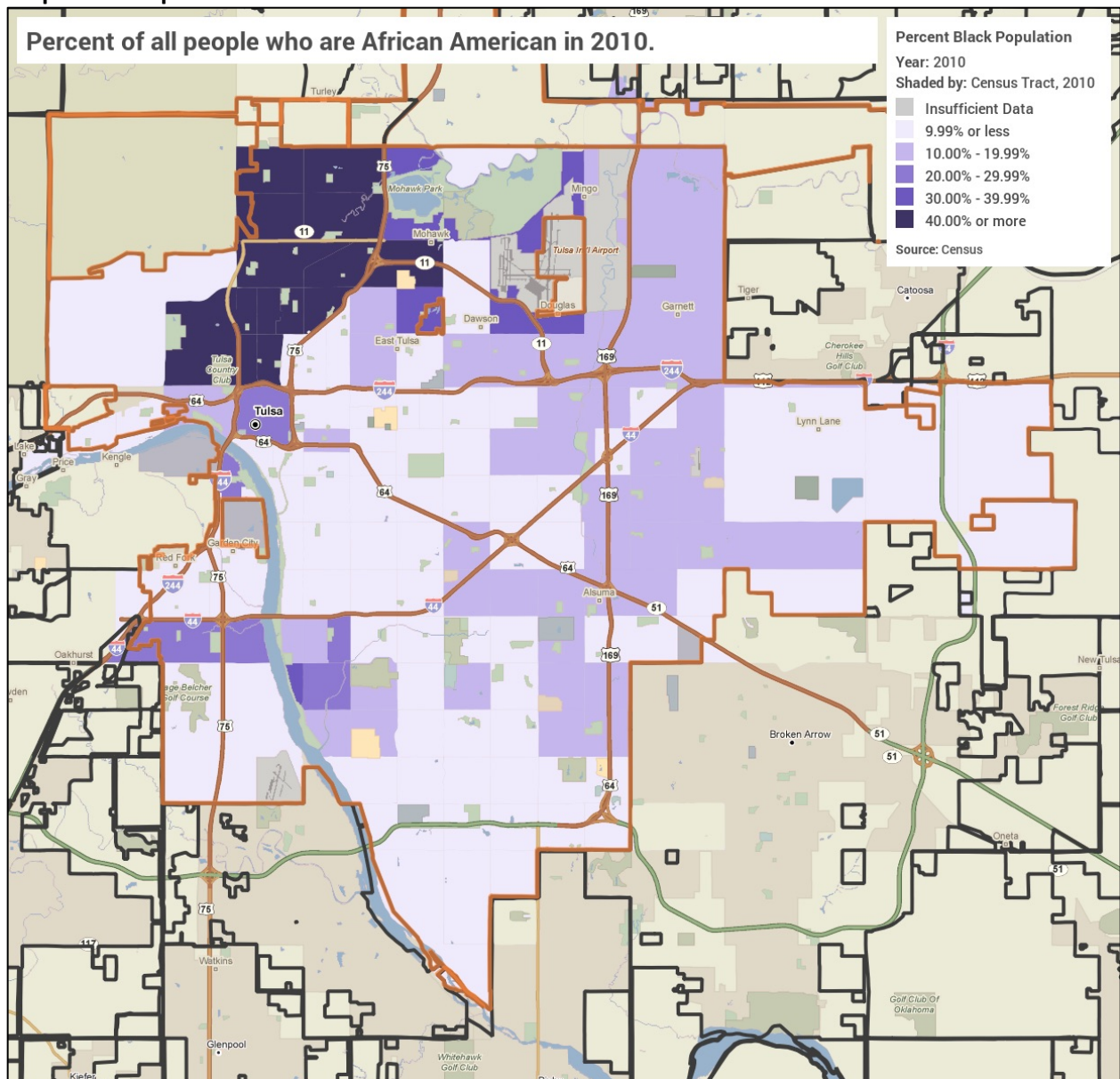
While the overall population has not changed greatly, the racial and ethnic composition of the City has seen a shift. Since 2010, the White population has shrunk by nearly 5,000 and the Black population has grown by only 600. Both groups are now less represented in the population as a whole. Hispanic/Latin residents saw the largest growth with approximately 13,500 new residents in the area while Asian residents had the largest relative growth growing from 8,591 to 13,304. Residents who identify as “Some Other” racial group or as Multi-racial also saw significant growth.

Table: Population by Race and Ethnicity					
Race and Ethnicity	2010		2017		% Change from 2010-2017
	Population	Percent	Population	Percent	
White	261,773	67.4%	256,829	64.0%	-5.0%
Black	60,173	15.5%	60,749	15.1%	-2.6%
American Indian	16,674	4.3%	17,088	4.3%	0.0%
Asian	8,591	2.2%	13,304	3.3%	50.0%
N. Hawaiian/P. Islander	318	0.1%	466	0.1%	0.0%
Some Other	16,611	4.3%	21,722	5.4%	25.6%
Two or More	24,107	6.2%	31,194	7.8%	25.8%
Total					
Hispanic	49,996	12.9%	63,466	15.8%	22.5%
Non-Hispanic	338,251	87.1%	337,886	84.2%	-3.3%
Source: 2013-2017 ACS (DP05)					
Data note: % change is by change in percentage.					

Change in Black Population from 2010 to 2017

As noted above, the City of Tulsa has significant population concentrations based on race and ethnicity. In 2010, the northwestern corner of the City had the largest concentration of Black residents. Despite making up only 15.5% of the population many of these tracts had a Black population of 40% or more. The majority of the City had a black population of less than 10%.

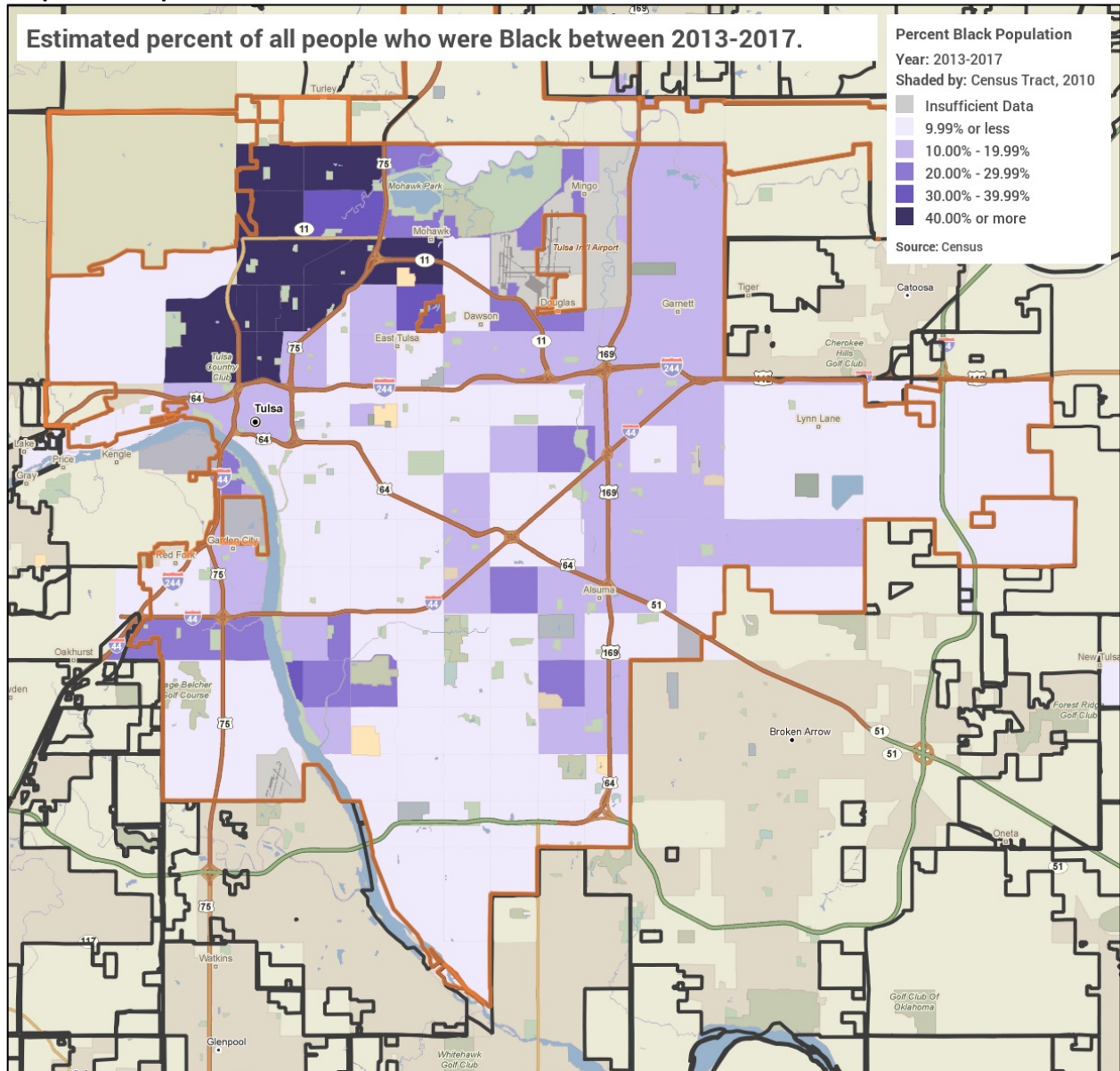
Map: Black Population 2010



Source: 2010 Census via PolicyMap

In 2017, the distribution pattern of Black residents is similar to 2010 but it is less concentrated than before. There appears to be more areas of the City that have a Black population of over 10% and the tracts in the northwest appear to have a smaller concentration than before. This may point to greater integration of the City and it may also be a result of the shrinking White population.

Map: Black Population 2017

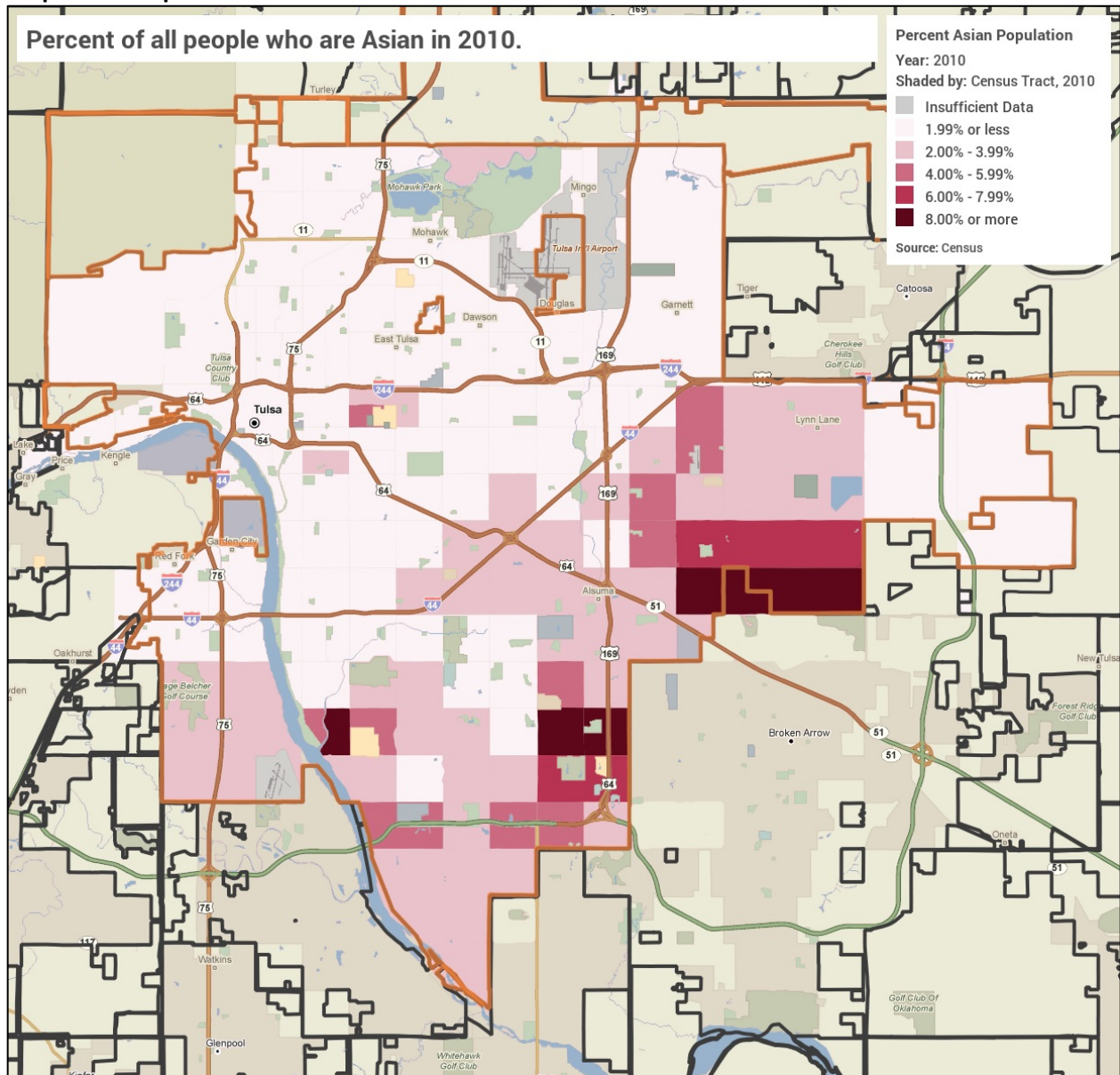


Source: 2013-2017 ACS via PolicyMap

Change in Asian Population from 2010 to 2017

In 2010, Asian residents were primarily concentrated in the southeastern part of the City. Many of these tracts had 8% or more of the population that identified as Asian while tracts in the rest of the City were generally under 2%. Overall, approximately 2.2% of the City's residents identify as Asian at that time.

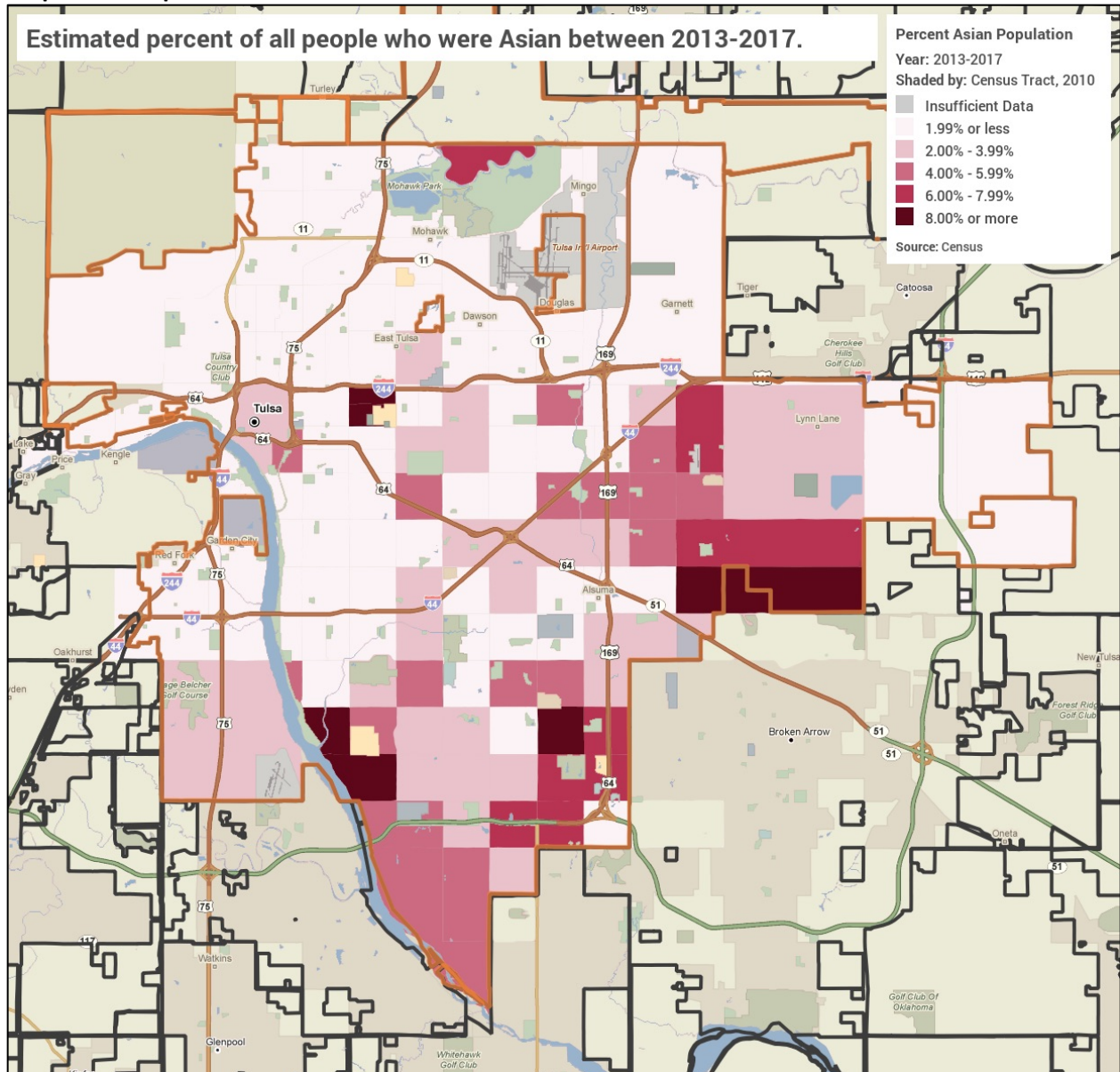
Map: Asian Population 2010



Source: 2010 Census via PolicyMap

In 2017, Asian residents are distributed more evenly across the City than in 2010 but there are still concentrations in the southeast. Similar to the concentration of Black residents, it appears that the City is becoming more racially integrated.

Map: Asian Population 2017

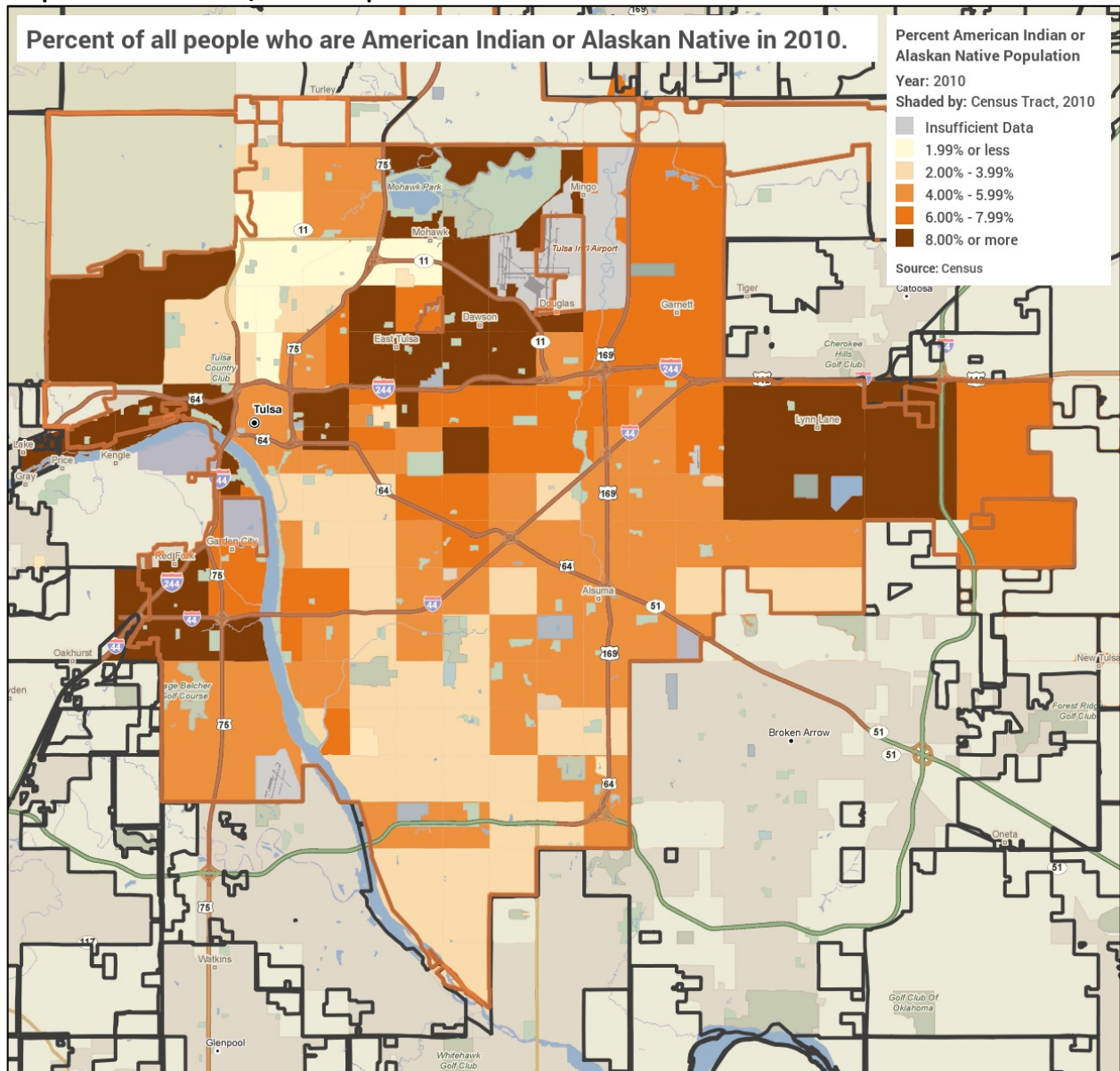


Source: 2013-2017 ACS via PolicyMap

Change in Native American/Alaskan Native Population from 2010 to 2017

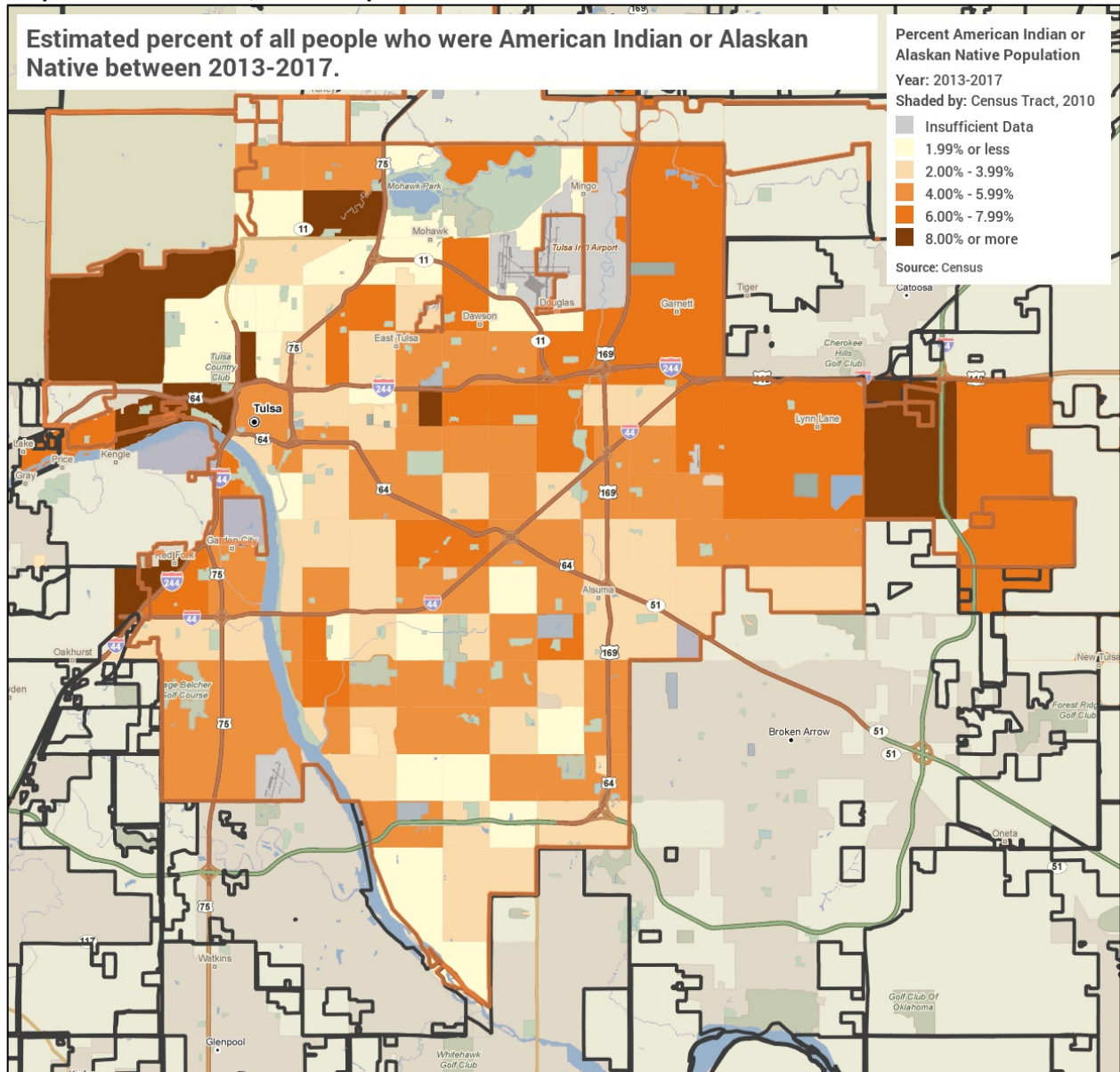
The Native American population represents 4.5% of the City of Tulsa. There is not a specific part of the City where this population appears to be concentrated but there are many tracts with a Native American population that is higher than average, often more than 8%.

Map: Native American/Alaska Population 2010



In 2017, the Native American population still represented 4.5% of the population. There appears to be even less racial concentrations of this group than in 2010. Fewer tracts have a relatively large Native American population while more are close to the citywide average.

Map: Native American/Alaska Population 2017

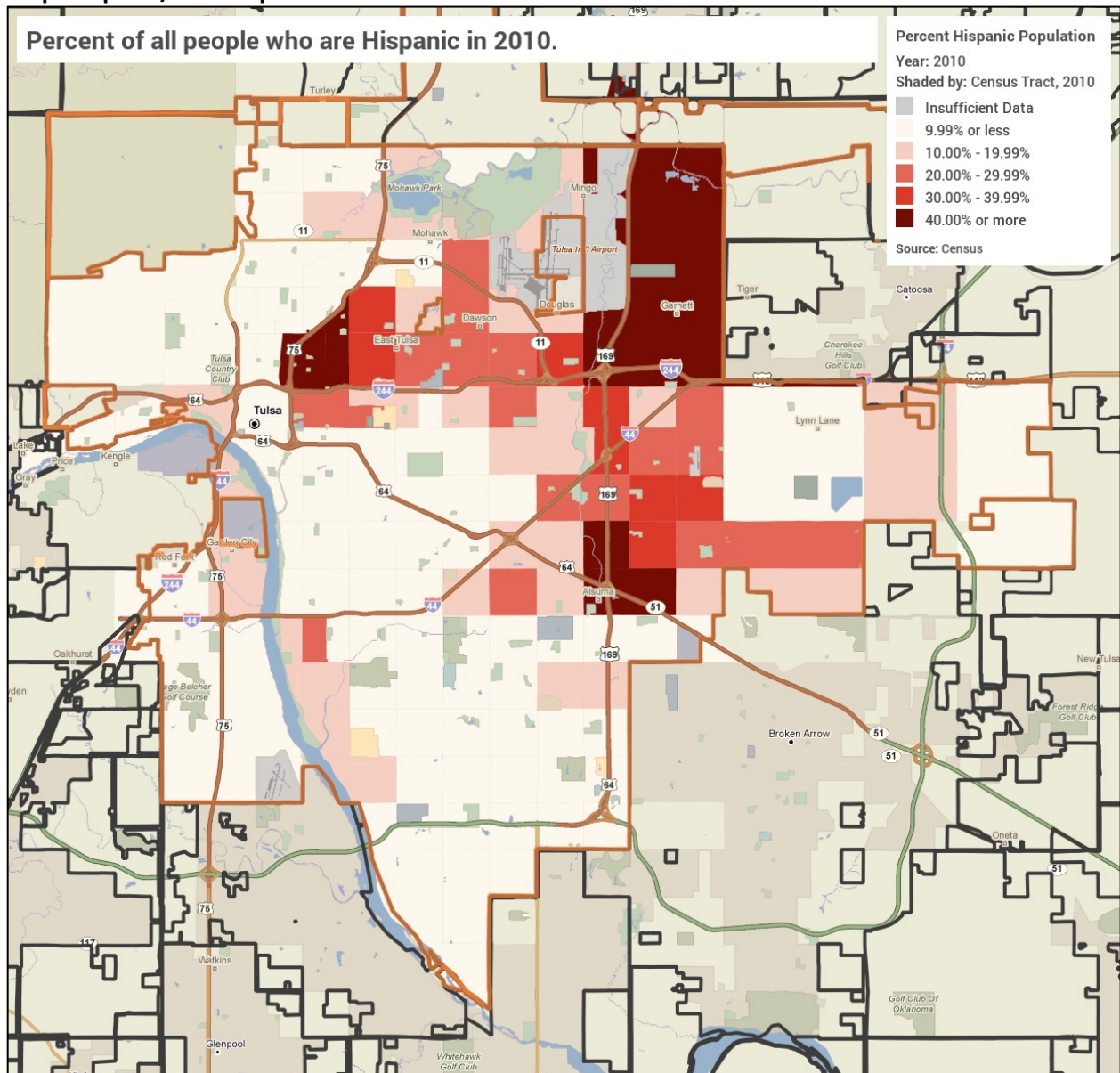


Source: 2013-2017 ACS via PolicyMap

Change in Hispanic/Latin Population from 2010 to 2017

Hispanic/Latin residents in 2010 were heavily concentrated in the northeast part of the City with a few other census blocks with a large population. These areas were 40% or more Hispanic/Latin, which is much larger than the 12.9% citywide average.

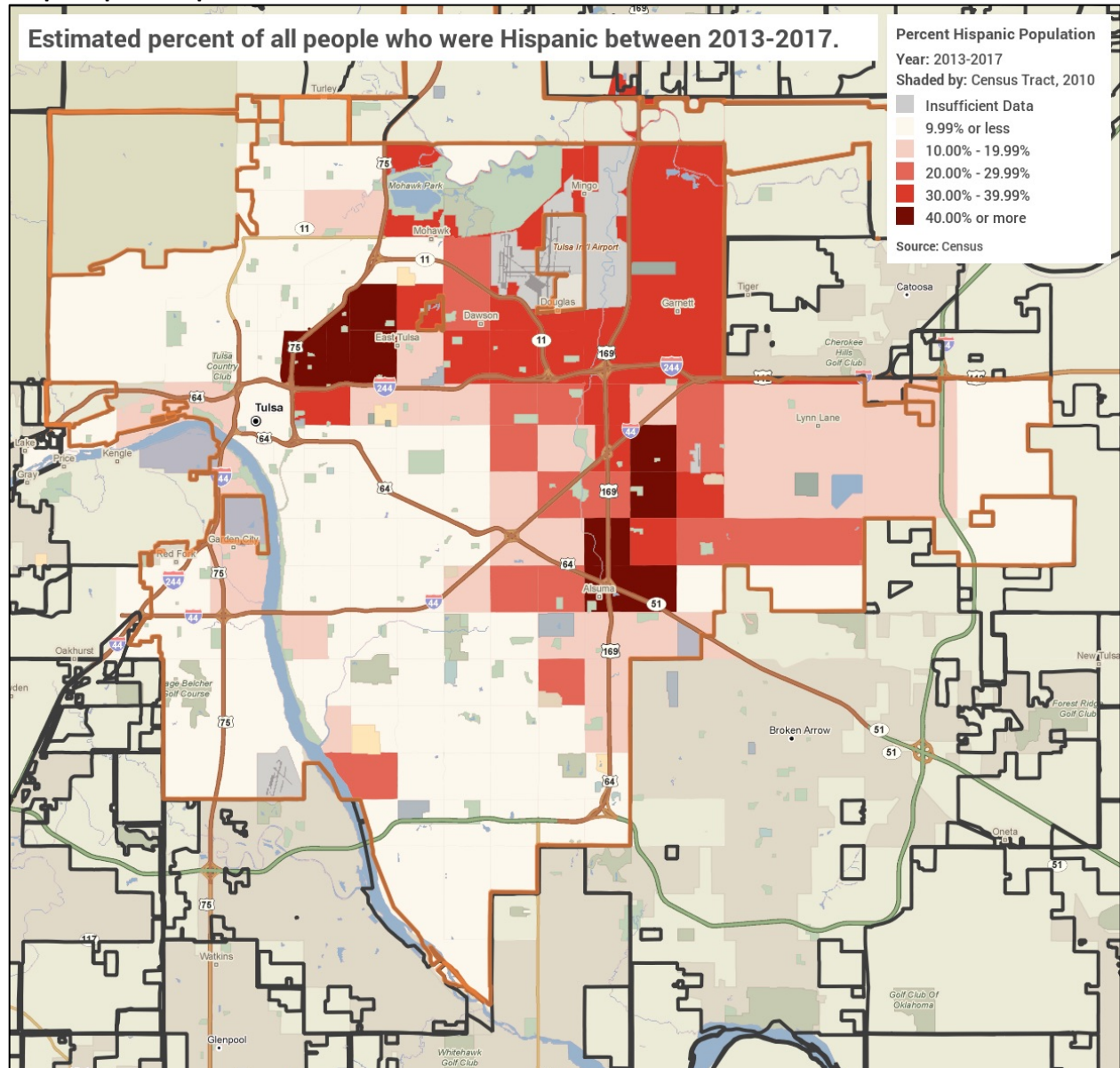
Map: Hispanic/Latin Population 2010



Source: 2010 Census via PolicyMap

In 2017, it appears that the ethnic concentration is less pronounced than in previous years. Fewer tracts have relatively large or small Hispanic populations. The western part of the City, particularly in the south does continue to have a relatively small Hispanic/Latin population.

Map: Hispanic Population 2017



Source: 2013-2017 ACS via PolicyMap

Education

For the population 25 years and older, the City of Tulsa is more well educated than the state as a whole. An estimated 30.7% have at least a Bachelor's degree or higher. This is higher than the state with 24.9% and comparable with the country as a whole with 30.9%.

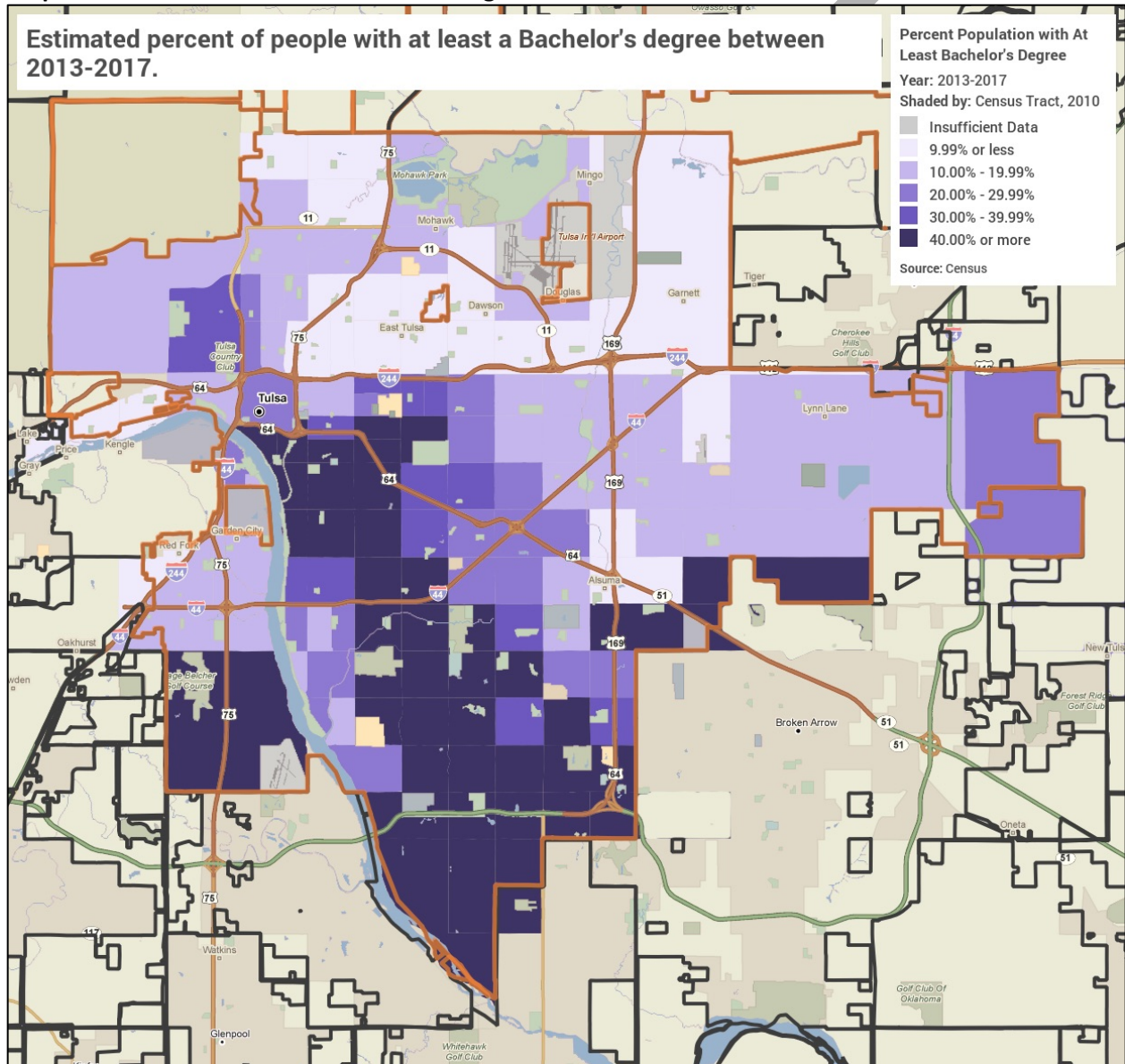
Table: Educational Attainment				
	Tulsa		Oklahoma	
	Estimate	Percent	Estimate	Percent
Total Population 25yrs and older	262,542	(X)	2,553,488	(X)
Less than 9th grade	14,169	5.4%	107,434	4.2%
9th to 12th grade, no diploma	19,937	7.6%	211,219	8.3%
High school graduate	66,338	25.3%	803,755	31.5%
Some college, no degree	60,721	23.1%	602,859	23.6%
Associate's degree	20,634	7.9%	193,857	7.6%
Bachelor's degree	53,190	20.3%	422,888	16.6%
Graduate or professional degree	27,553	10.5%	211,476	8.3%
Source: 2013-2017 ACS (S1501)				

Higher educational attainment directly impacts the potential median earnings of individuals. According to the 2013-2017 ACS, persons with a Graduate or professional degree earn over two times more than a person with only a high school degree.

Table: Median Earnings by Educational Attainment	
	Estimate
Population 25 years and over with earnings	\$32,381
Less than high school graduate	\$22,059
High school graduate (includes equivalency)	\$25,788
Some college or associate's degree	\$31,124
Bachelor's degree	\$44,364
Graduate or professional degree	\$60,536
Source: 2013-2017 ACS (S1501)	

It is clear that the southern areas of Tulsa have a much higher percentage of people with a Bachelor's degree or higher. By contrast, much of the northern areas of the City have a lower percentage of people with a Bachelor's degree. As educational attainment directly impacts a person's income, the northern areas are at higher risk of exposure to poverty and other economic challenges. Black and Hispanic populations are prominent in the north and have a Bachelor's degree at a rate of 18.4% and 9.3% respectively – both well below the city average of 30.7%.

Map: Educational Attainment Bachelor's Degree

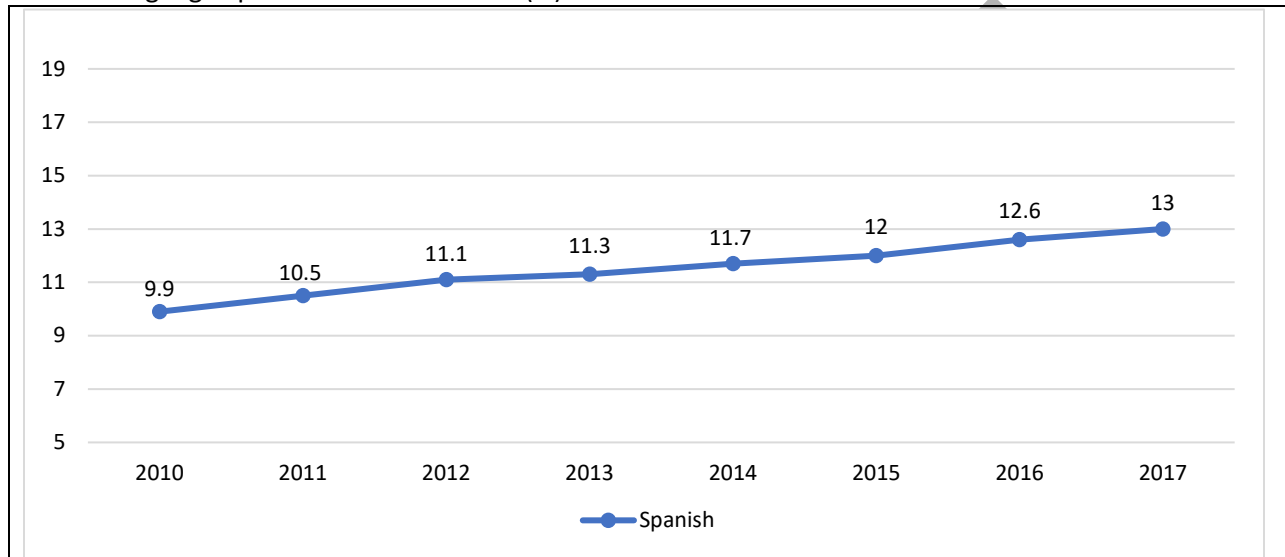


Source: 2013-2017 ACS via PolicyMap

Language Spoken at Home

With the number of individuals who identify as ethnically Hispanic/Latin rising in the City of Tulsa, it is increasingly necessary to ensure language is not a barrier to accessing resources or fair housing rights. The use of Spanish at home has increased steadily in Tulsa between 2010 and 2017. Given this information it is important that resources be made available in Spanish and efforts made to include members of this community in decision making. Fair housing education should be conducted in Spanish, as well as English.

Chart: Language Spoken at Home in Tulsa (%)



Source 2006-2010 ACS – 2013-2017 ACS (S1601)

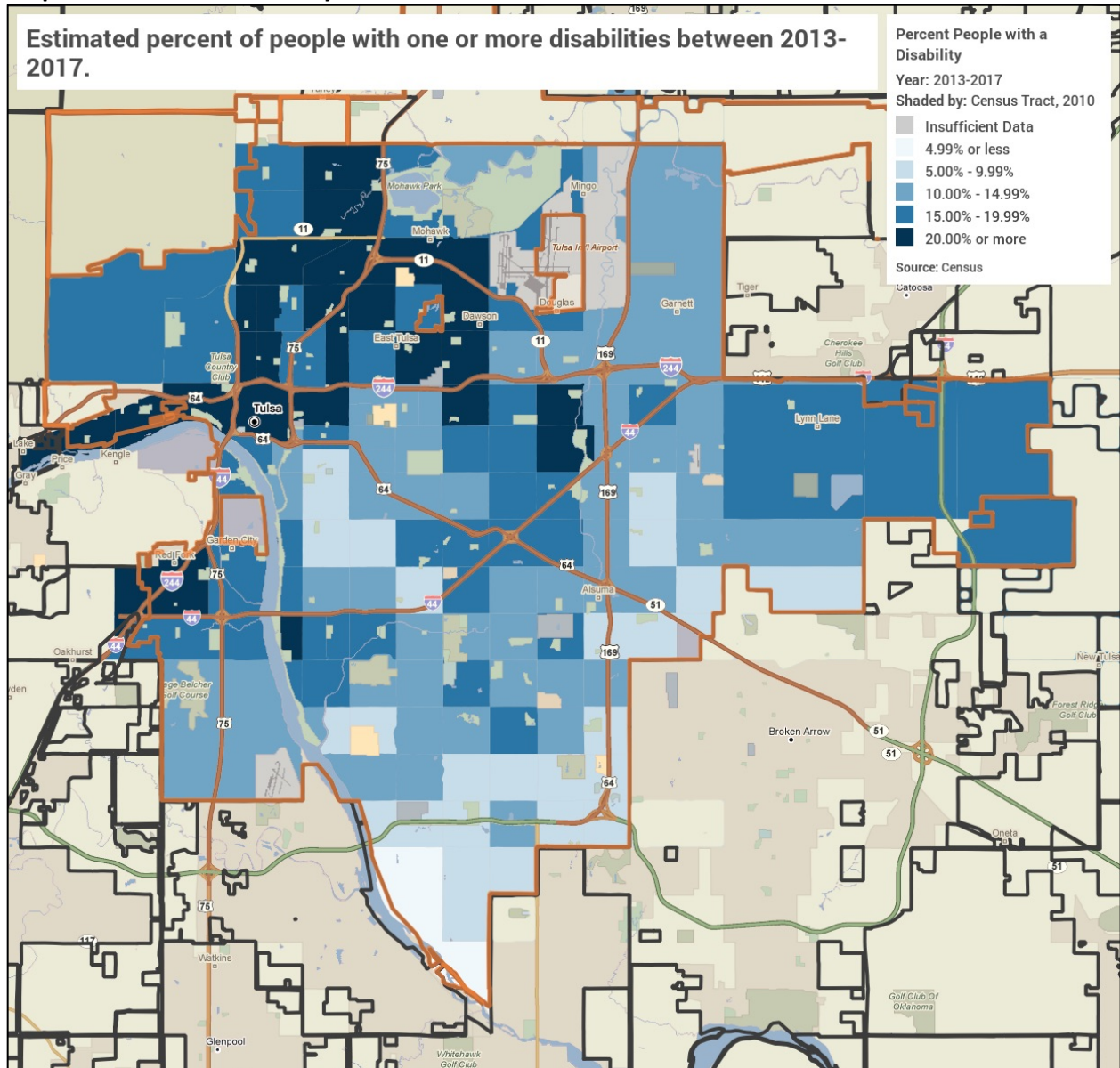
Disability Status

In addition to having to overcome barriers such as housing discrimination and difficulty finding accessible units, people with disabilities often face financial hardships at a higher rate than those without a disability. In Tulsa, there are nearly 60,000 total residents with a disability, making up 14.8% of the population. Unsurprisingly, residents who are elder tend to have more disabilities than those who are younger. Over half of the residents over the age of 75 have a disability.

Table: Disability and Age			
Age	Total	With a disability	Percent
Under 5 years	29,062	385	1.3%
5 to 17 years	69,410	4,368	6.3%
18 to 34 years	101,396	8,315	8.2%
35 to 64 years	145,483	25,660	17.6%
65 to 74 years	30,034	8,689	28.9%
75 years and over	22,448	11,320	50.4%
Total	397,833	58,737	14.8%
Source: 2013-2017 ACS (S1810)			

There appears to be a concentration of people with disabilities in the northwest corner of the City. This area is primarily Black and many tracts have disability rates of over 20%. Tracts along the southeastern edge have rates much lower, usually less than 5%.

Map: Persons with a Disability in 2017



Source: 2013-2017 ACS via PolicyMap

Veterans

As of 2017, there were 23,621 veterans in the City of Tulsa – 7.8% of the population. The economic status of veterans in the City is somewhat different than non-Veterans. The Labor Participation rate and Unemployment rate are similar for both groups. However, veterans have a median income that is \$11,000 more than non-veterans and the poverty rate for veterans is nearly half. Veterans are about twice as likely to have a disability than non-veterans.

Table: Veterans Economic Status		
	Veterans	Non-Veterans
Civilian population over 18 years old	23,621	278,972
Median Income	\$36,909	\$25,934
Labor force participation rate	73.5%	73.5%
Unemployment rate	6.2%	6.7%
Below poverty in the past 12 months	9.3%	17.0%
With any disability	33.2%	16.9%
Source: 2013-2017 ACS (S2101)		

ECONOMICS

The availability of economic opportunities within the community is of utmost importance to recognizing and addressing impediments to fair housing choice. The job market, access to low poverty neighborhoods, and transportation options all play a role in the housing options a household has. By their nature, economic opportunities are often linked to a specific geographic area. In a city like Tulsa where geography and race or ethnicity are correlated it is important to thoroughly analyze the locations where opportunities exist.

Labor Force and Employment

The labor force and number of people employed track very closely between 2000 and 2018. However, it appears that the number of persons employed is more volatile and responds more dramatically to changes in the economic conditions in the City. Both measures were at their lowest in 2009 and have been steadily increasing since then.

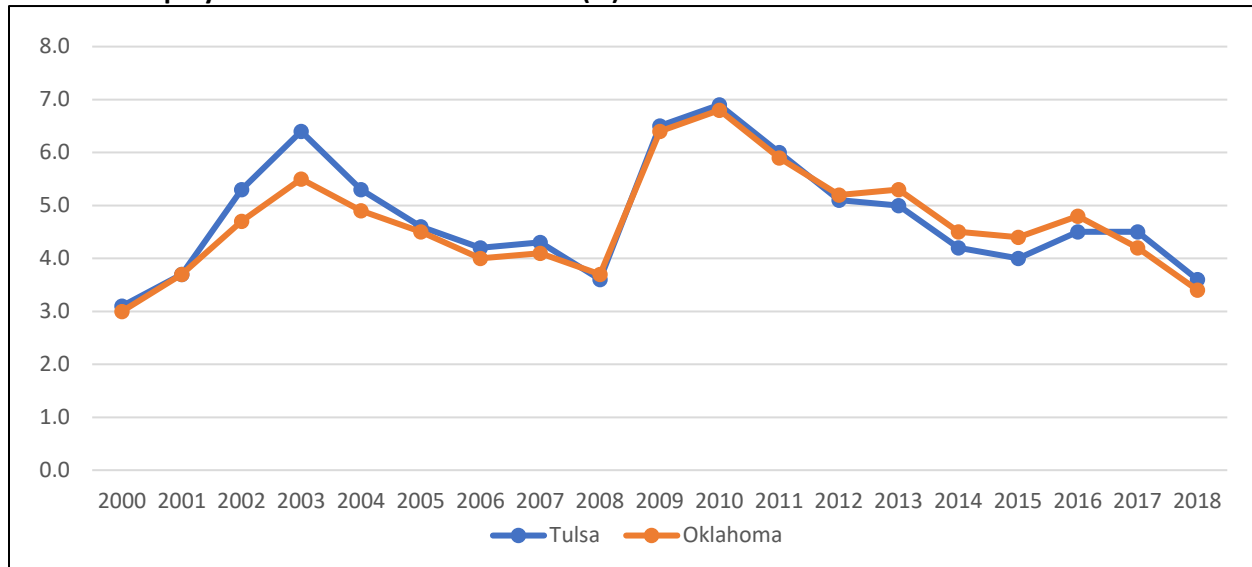
Chart: Employment from 2000 to 2018



Source: BLS, Local Area Unemployment Statistics, Not seasonally adjusted

The unemployment rate in Tulsa has remained close to the statewide unemployment rate since 2000. There have been a few time periods where they were not as closely aligned, but overall they are very similar.

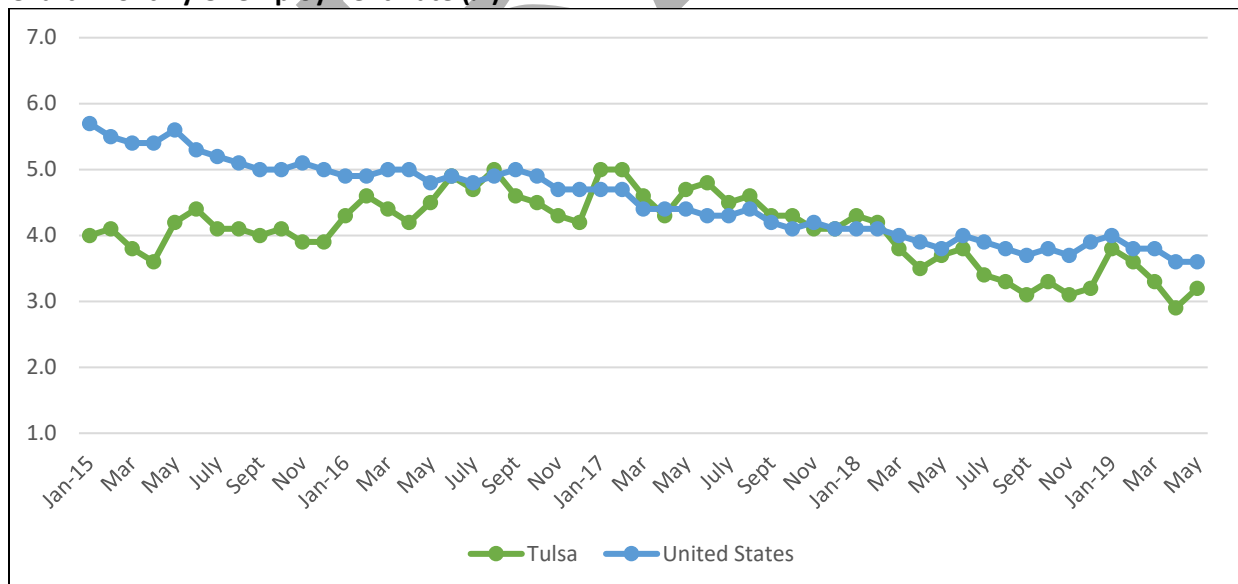
Chart: Unemployment Rate from 2000 to 2017 (%)



Source: BLS, Local Area Unemployment Statistics, Not seasonally adjusted

The monthly unemployment rate since 2015 differed between the City and the Country. In the U.S., the unemployment rate started at almost 6% in 2015 and has been steadily decreasing since then. Tulsa started much lower, around 4%, and increased through early 2017 before decreasing again to about 3.3%.

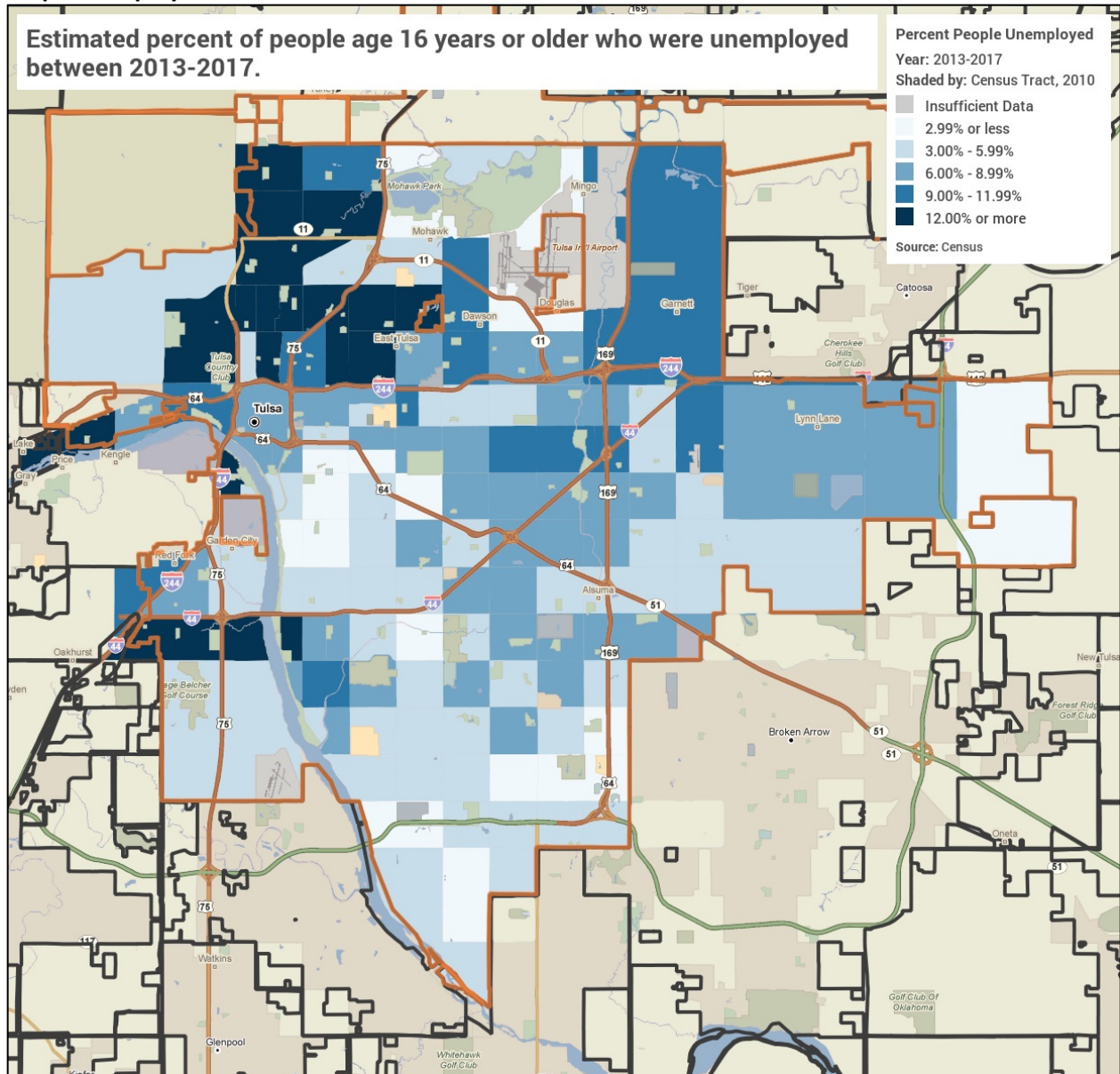
Chart: Monthly Unemployment Rate (%)



Source: BLS, Local Area Unemployment Statistics, Not seasonally adjusted

The northwest part of the City, which has a large Black population, has an unemployment rate that is much higher than other parts of the City. Tracts in this area have an unemployment rate of 12% or more, which is more than four times the rate found in some other parts of the City.

Map: Unemployment Rate in 2017

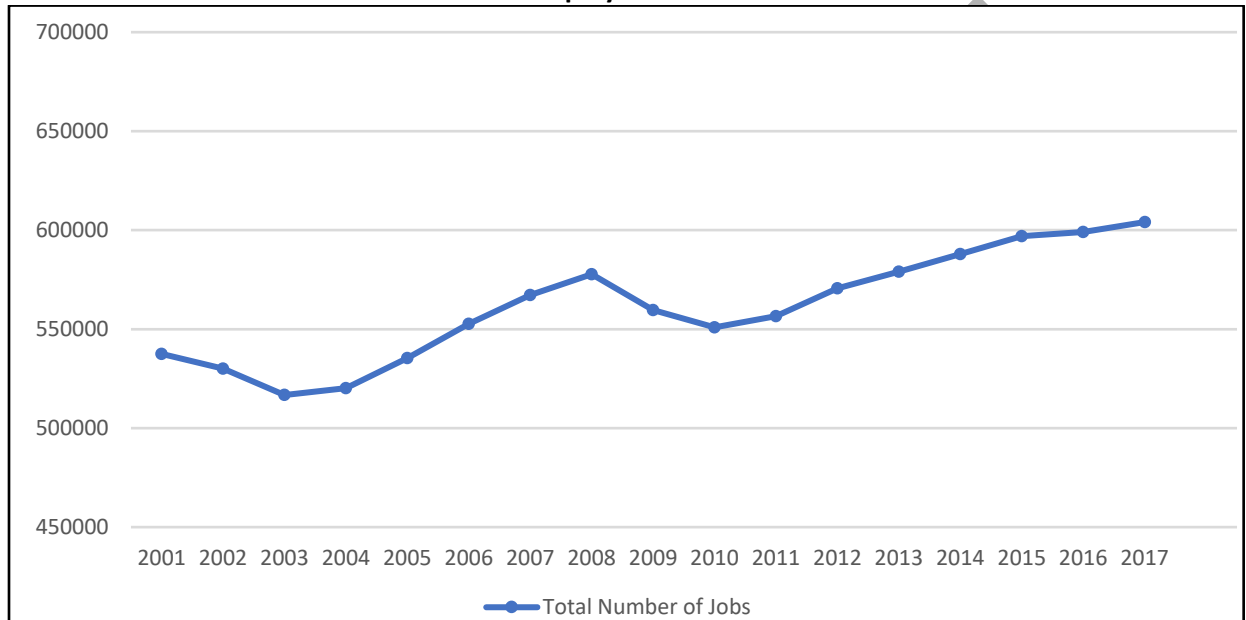


Source: 2013-2017 ACS via PolicyMap

Full- and Part-Time Employment and Earnings

According to the Bureau of Economic Analysis, full employment refers to the total number of part-time and full-time jobs in the Tulsa MSA (Tulsa Metropolitan Statistical Area). Using this definition, the same worker may be counted multiple times if they have multiple jobs. The number of jobs in the Tulsa MSA decreased from 2001 to 2003 before climbing until 2008. Then, the job market contracted, and the number of jobs fell to about 550,000 in 2010. Since then, there has been a steady increase in jobs to approximately 600,000 in 2017.

Chart: Number of Jobs Full- and Part-Time Employment in Tulsa MSA

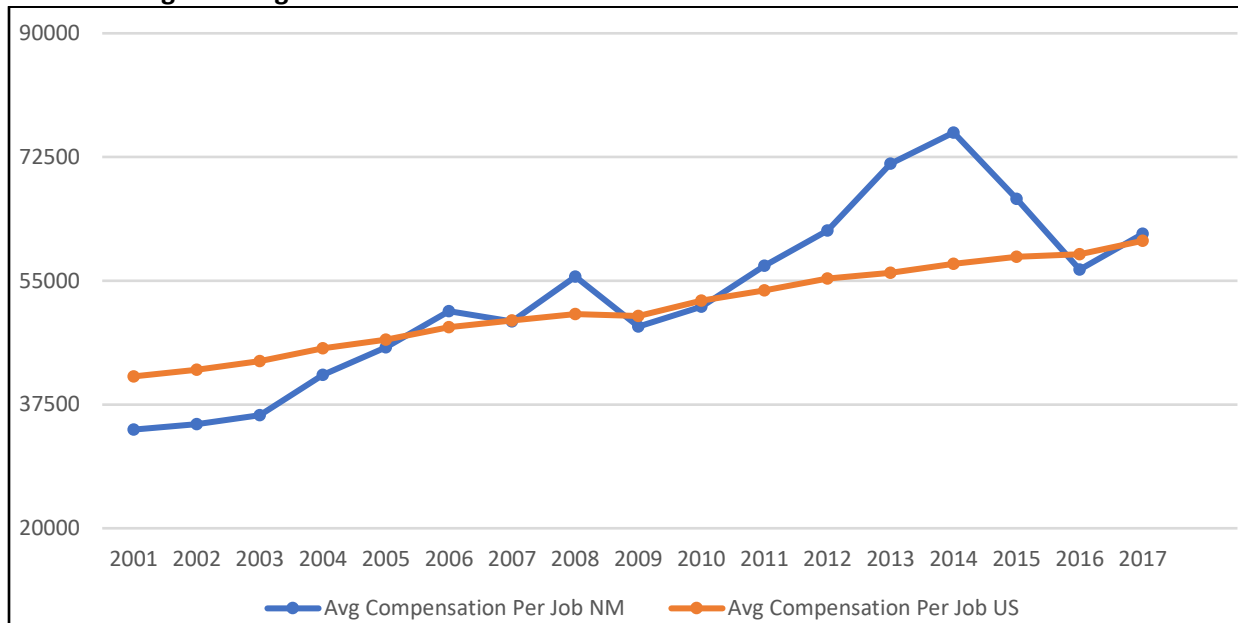


Source: BEA

Data Note: The BEA does not break down estimates by cities, therefore the Tulsa Metropolitan Statistical Area (MSA) was used.

The average pay per job in Tulsa is more volatile than in the Country as a whole. Between 2001 and 2017, the national average earnings per job has grown at a very stable and steady rate. In Tulsa, there have been significant increases and decreases, particularly between 2014 and 2016 when the high average earning of over \$72,500 fell by approximately \$20,000.

Chart: Average Earnings Per Job

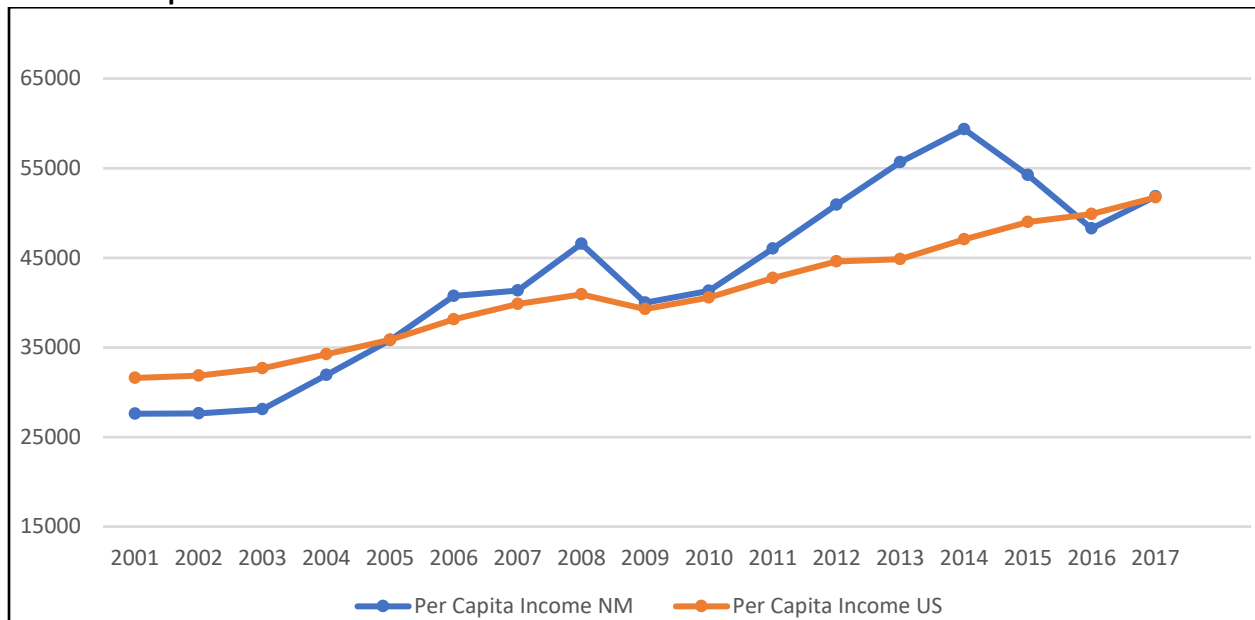


Source: BEA

Data Note: The BEA does not break down estimates by cities, therefore the Tulsa Metropolitan Statistical Area (MSA) was used.

Similar to the above chart, the per capita income in the Tulsa MSA is more volatile than the nation. Again, we see the national growth rate fairly stable but high peaks and valleys for the City.

Chart: Per Capita Income



Source: BEA

Data Note: The BEA does not break down estimates by cities, therefore the Tulsa Metropolitan Statistical Area (MSA) was used.

Household Income

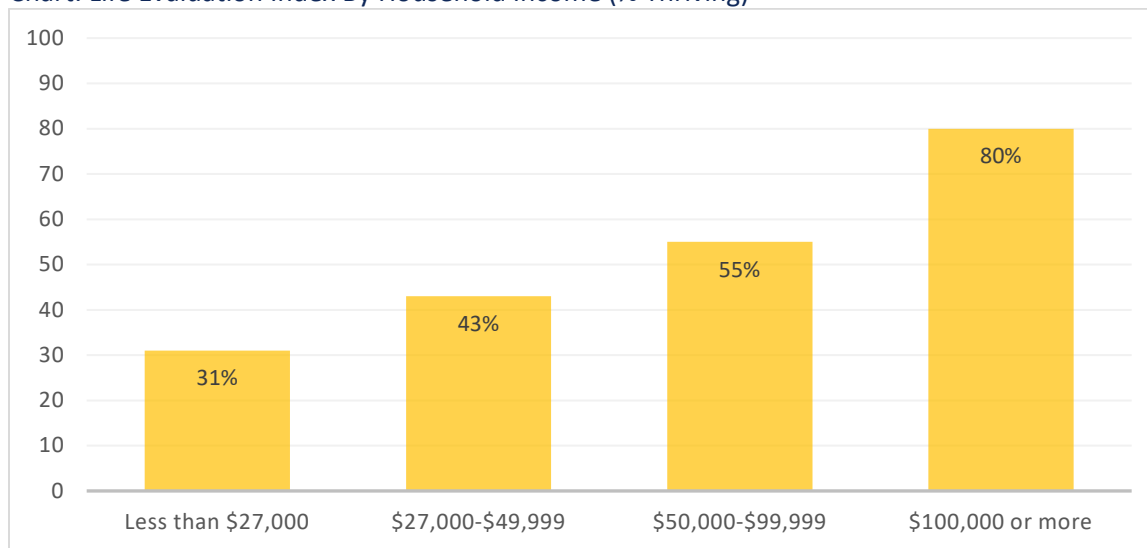
Since 2010, the market has become more stable and began recovery from the crash in 2008. Since then, the number of income earning households fell by approximately 500 households. Generally, there are more households in higher income groups now than there were in 2010. For all income groups over \$100,000 there are more households and for all income groups under \$50,000 there are fewer.

Table: Households by Income				
Income	2010		2017	
	Households	Percent	Households	Percent
Less than \$10,000	15,888	9.6%	15,499	9.4%
\$10,000 to \$14,999	12,123	7.4%	9,537	5.8%
\$15,000 to \$24,999	22,860	13.9%	20,542	12.5%
\$25,000 to \$34,999	22,904	13.9%	19,081	11.6%
\$35,000 to \$49,999	26,174	15.9%	25,485	15.5%
\$50,000 to \$74,999	26,239	15.9%	29,356	17.9%
\$75,000 to \$99,999	15,285	9.3%	15,252	9.3%
\$100,000 to \$149,999	13,013	7.9%	15,561	9.5%
\$150,000 to \$199,999	4,593	2.8%	6,342	3.9%
\$200,000 or more	5,809	3.5%	7,726	4.7%
Total	164,888	(X)	164,381	(X)
Source: 2006-2010 ACS (DP03), 2013-2017 ACS (DP03)				

While the number of higher income earning groups is increasing in the City, there remains a significant number of households earning lower incomes. It is not surprising that households with low-income experience poverty, housing cost burden and a lower quality of life to a higher degree than higher income earning households. Currently, there are over 45,000 households that still make less than \$25,000 per year – that is over a quarter of the total households in Tulsa.

The City partnered with Gallup in 2018 to conduct a citywide survey to track its progress in improving the quality of life of its residents. At a basic level, city residents were asked on a scale of 1-10 to provide their basic well-being with zero representing the worst possible life for them and 10 as the best possible life. Overall, 50% classified as thriving, 46% were struggling and 4% were suffering. However, there was significant differences in the well-being among different income groups reporting within the City. According to the Life Evaluation Index (% Thriving), households with income less than \$27,000 annual reported only 31% as thriving, while households with \$100,000 or more reported with 80% as thriving.

Chart: Life Evaluation Index By Household Income (% Thriving)



Source: 2018 Gallup-Tulsa CitiVoice Index Results

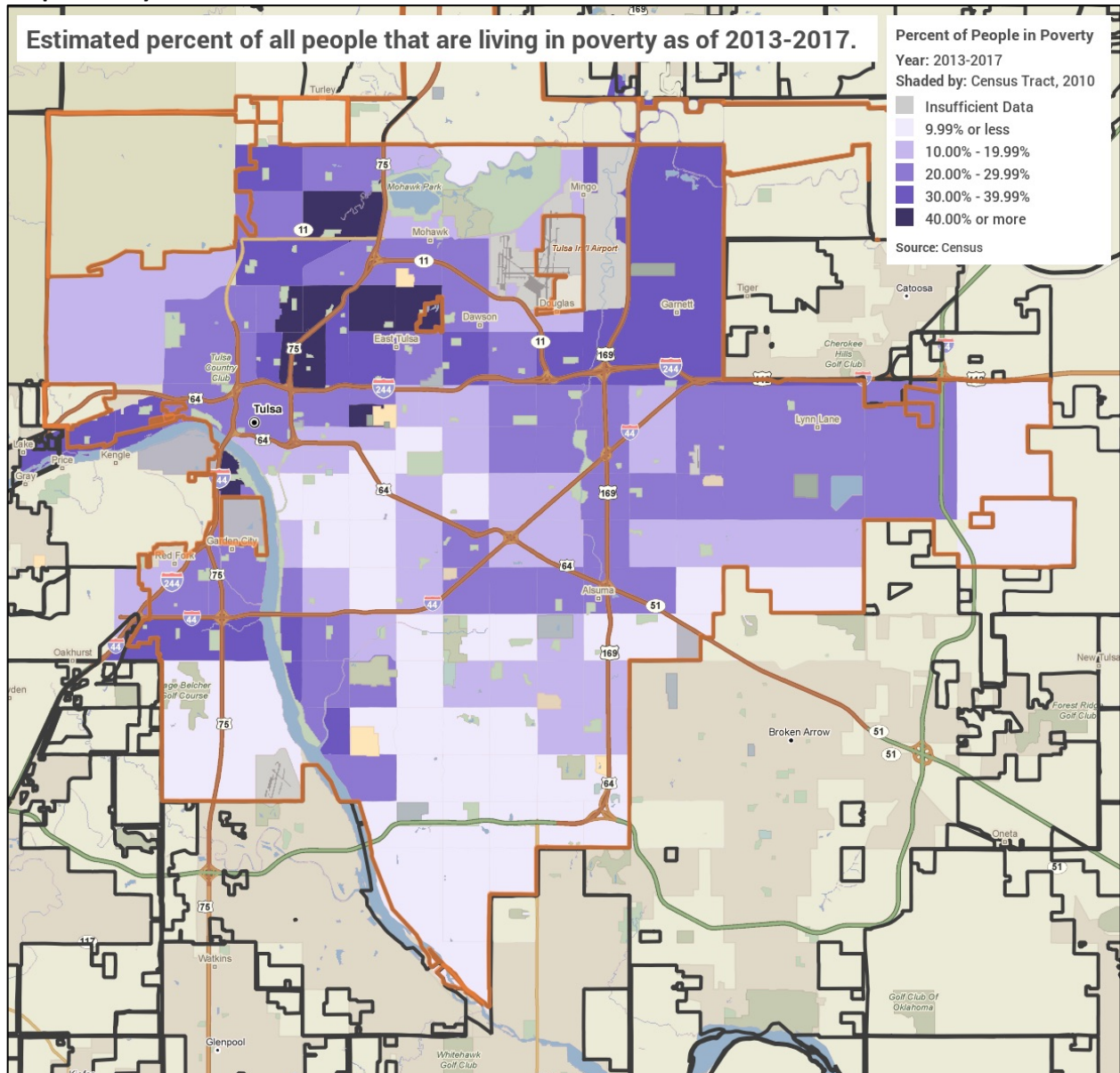
Poverty

The Census Bureau uses income thresholds that vary by family size and composition to determine whether that family is in poverty or not. If a family's household income is below the threshold then every member of the household is considered in poverty. The poverty rate in the City has gone up for all age groups except for 65 years old and older. The largest increase was 18 to 64 years old but the Under 18 population has the highest overall poverty rate of 31%.

Table: Poverty by Age			
Age Group	2010	2017	% Change from 2010-2017
All People	19.3%	20.0%	3.6%
Under 18 years	30.9%	31.0%	0.3%
18 to 64 years	16.9%	18.0%	6.5%
65 years and over	9.0%	9.0%	0.0%
Source: 2013-2017 ACS (S1701)			

The northwest corner of the City stands out as an area where poverty is heavily concentrated. Considering this area is largely Black, it is likely that many of those tracts meet HUD's definition as a Racially/Ethnically Concentrated Area of Poverty (R/ECAP). Addressing R/ECAPs is an important goal for communities across the nation. Many of the tracts there have a poverty rate of 40% or higher. This stands in stark contrast to areas to the south and southeast where the poverty rate is less than one-quarter of that.

Map: Poverty Rate in 2017



Source: 2013-2017 ACS via PolicyMap

Transportation

According to the most recent American Community Survey, driving a vehicle alone is the most common form of transportation in the City. The second most common form is carpooling (10.9%) or working from home (4.0%). Very few people in the City utilize public transportation or use non-motorized options like walking or bicycling.

Table: Commuting to Work	
	Estimate
Workers 16 years and over	188,166
Car, truck, or van -- drove alone	80.1%
Car, truck, or van -- carpooled	10.9%
Public transportation (excluding taxicab)	1.0%
Walked	1.7%
Bicycle	0.3%
Taxi, motorcycle, other means	1.9%
Worked at home	4.0%
Mean travel time to work (minutes)	18.4
Source: 2013-2017 ACS (DP03, S0801)	

The travel time to work is relatively low in the City of Tulsa. The majority of residents commute less than 20 minutes and only 2.7% commute more than an hour. Long commute times have been linked to a number of negative health effects and the availability of transportation opportunities that minimize them can be beneficial to individuals and the City.

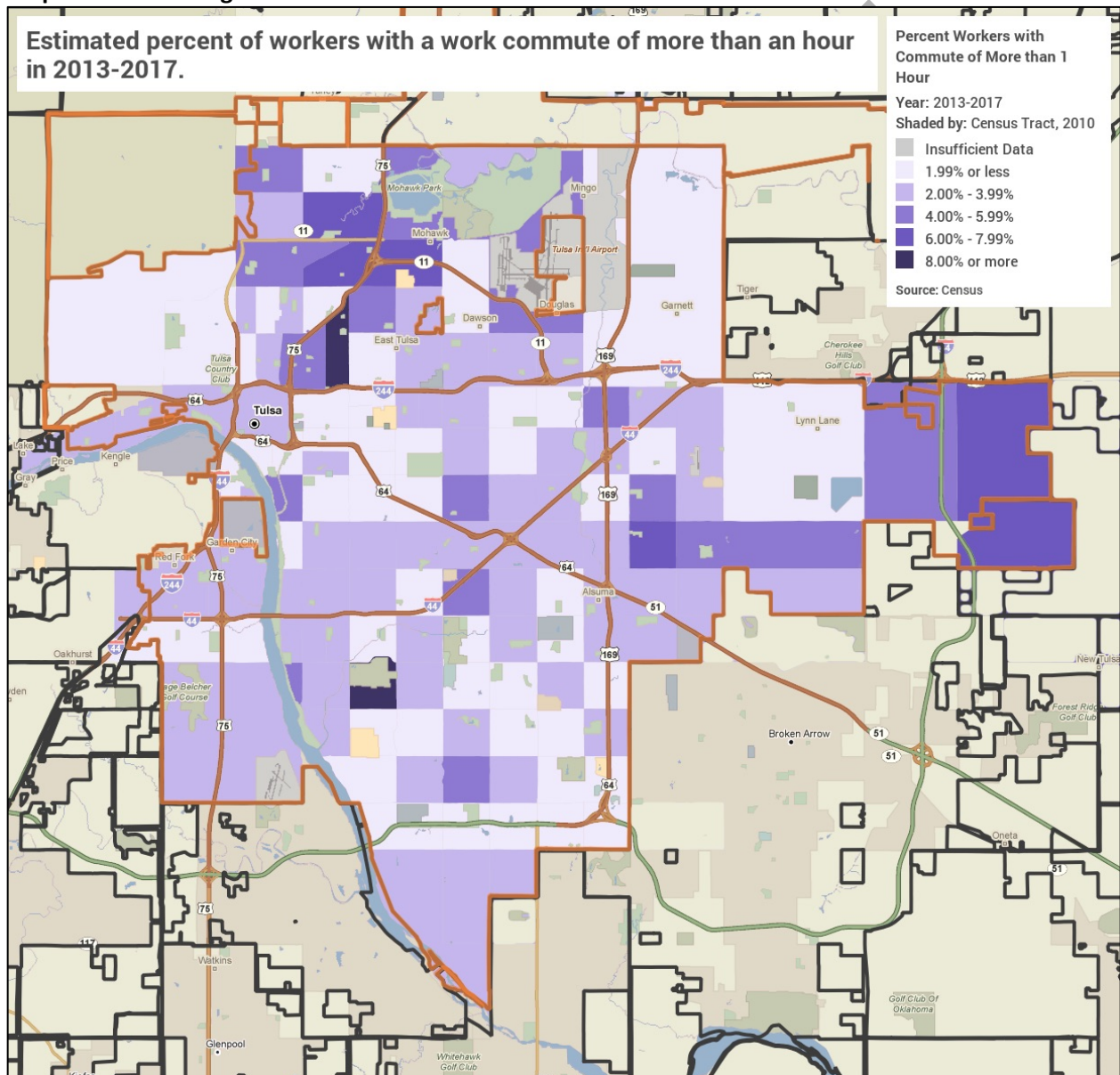
Table: Travel Time to Work	
	Estimate
Workers 16 years and over who did not work at home	180,550
Less than 10 minutes	15.0%
10 to 19 minutes	44.8%
20 to 29 minutes	25.2%
30 to 59 minutes	12.2%
60 or more minutes	2.7%
Source: 2013-2017 ACS (S0801)	

The City of Tulsa is the core city in the Connections 2035 Regional Transportation Plan (RTP), a plan that anticipates transportation needs for the region based on demographic and economic assumptions and forecasts. The population and employment in the City is projected to continue increasing for the next decade and beyond. This growth, if left unchecked, will result in greater congestion, which will increase commute times resulting in decreased productivity among the workforce, increase vehicle emissions causing a decline in air quality, increase fuel consumption putting a strain on resources, and heighten the likelihood of accidents. While it is not a serious issue for the City currently, it is recommended by the RTP that the transportation system in the region must be ready for the future. Some strategies planned are enhanced networks that include high capacity transportation such as commuter rail, light-rail, and bus

rapid transit. Strategies also include extending these networks and continued development of targeted corridors within the region.

Overall, there is not any particular area of the City where the commute time is abnormally long. Only two tracts have 8% or more of their population commuting over an hour and the majority have only 2% or less.

Map: Commute Longer Than One Hour

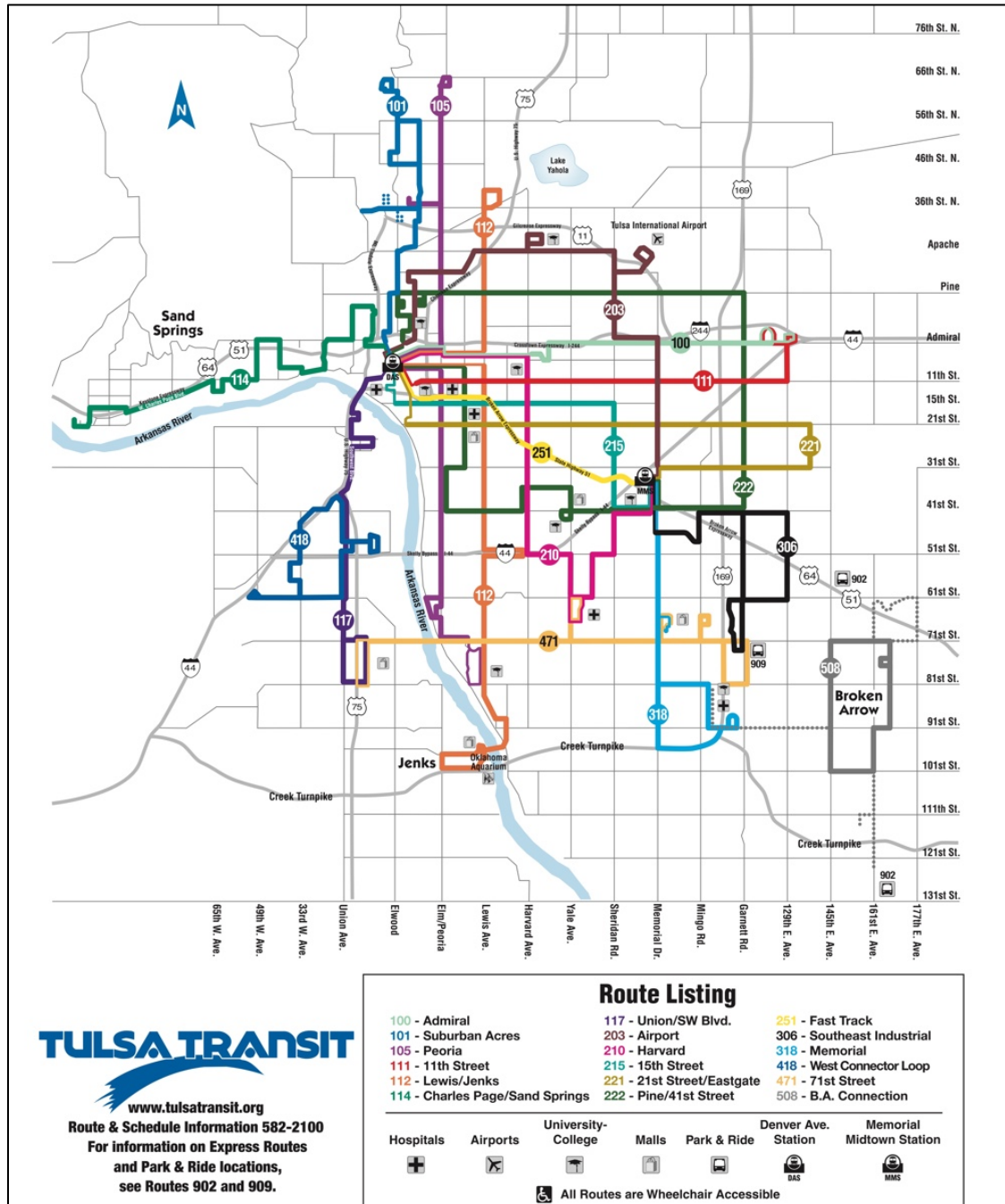


Source: 2013-2017 ACS via PolicyMap

Public transportation in Tulsa appears to be fairly thorough. Each neighborhood has at least one bus route that is relatively close to it. Like many communities, it is difficult to provide a public bus service that has

easy access to all neighborhoods, and this issue has been flagged as being among the most important throughout the community outreach process, especially as it relates to access to jobs, services, and amenities. To help address this, the City included the strategy to increase frequent bus availability in its 2018 Action and Implementation Management Plan (AIM) with the help of its partners Tulsa Transit and the Indian Nations Council of Governments (INCOG).

Map: Tulsa Transit System Map (Public Transportation)



Source: Tulsa Transit, 2019

HOUSING

This section identifies the current housing situation within the City of Tulsa, as well as how it has changed over the years. Included in this evaluation is what the housing stock looks like and how that matches with the needs of the community. As before, a geographic analysis will also be conducted of key points to identify any areas that may lack housing opportunities.

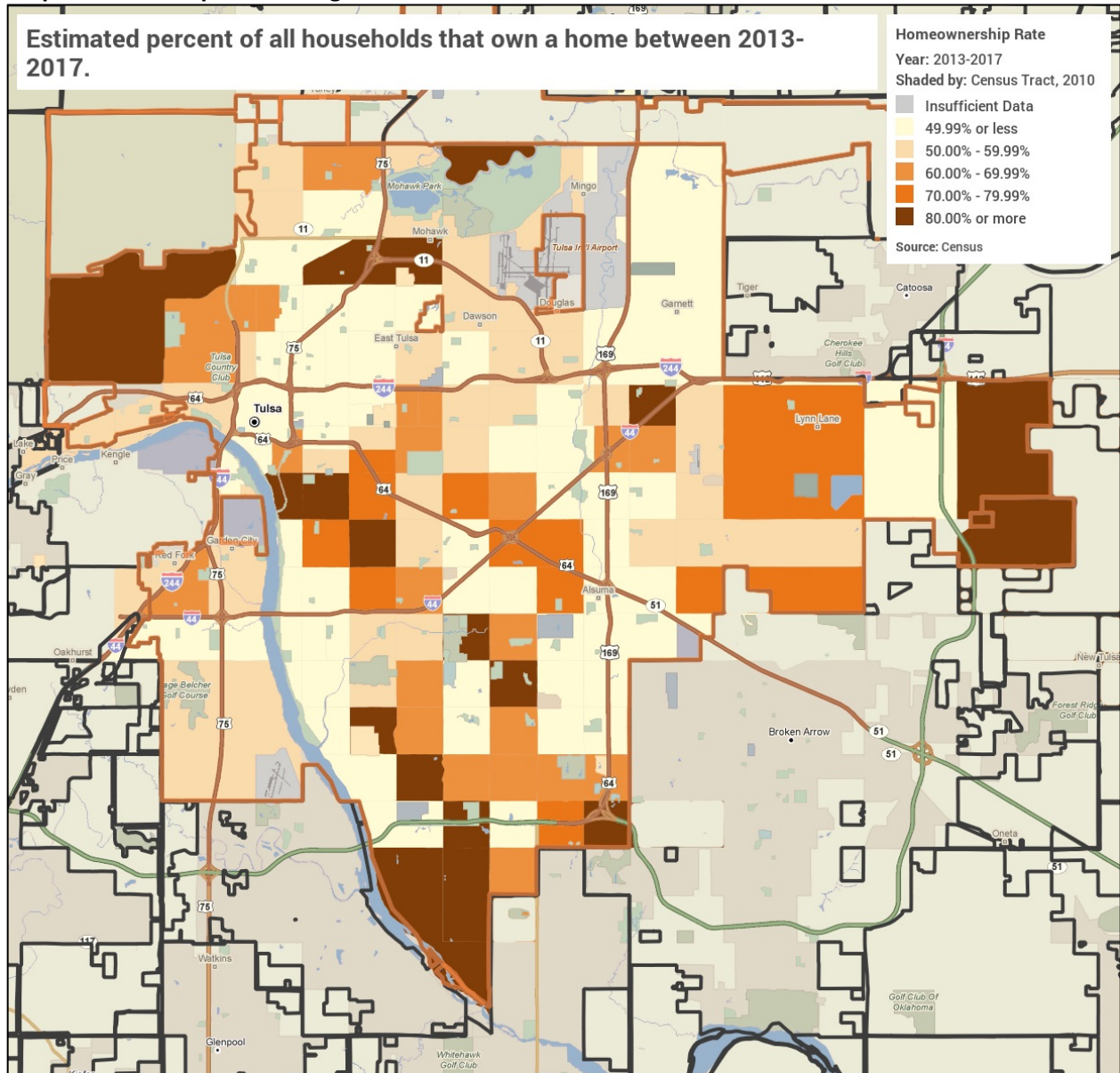
Characteristics of the Housing Stock

Since 2010, the number of housing units in the City fell by approximately 500 units. Owner occupied units fell by over 5,000 units while renter occupied units grew by a similar amount. The number of vacant units in the City grew by approximately 2,000 units and currently makes up 12.2% of the housing units. Housing vacancy will be analyzed in more detail later in this document.

Table: Housing Units by Tenure					
Tenure	2010		2017		% Change from 2010-2017
	Units	% of Total	Units	% of Total	
Occupied Units	164,888	--	164,381	--	--
Owner-Occupied	89,662	54.4%	84,008	51.1%	-6.1%
Renter-Occupied	75,226	45.6%	80,373	48.9%	7.2%
Vacant Units	20,686	11.10%	22,774	12.20%	9.9%
Total Housing Units	185,574	--	187,155	--	--
Source: 2006-2010 ACS (DP04), 2013-2017 ACS (DP04)					
Data note: % change is by change in percentage.					

Just over 51% of the housing stock in Tulsa is owner-occupied. There are no clear concentrations of owner-occupied housing units in the City as a whole, however some tracts clearly have a disproportionately large amount of owner-occupied units. In many tracts, over 80% of the housing units are for owners.

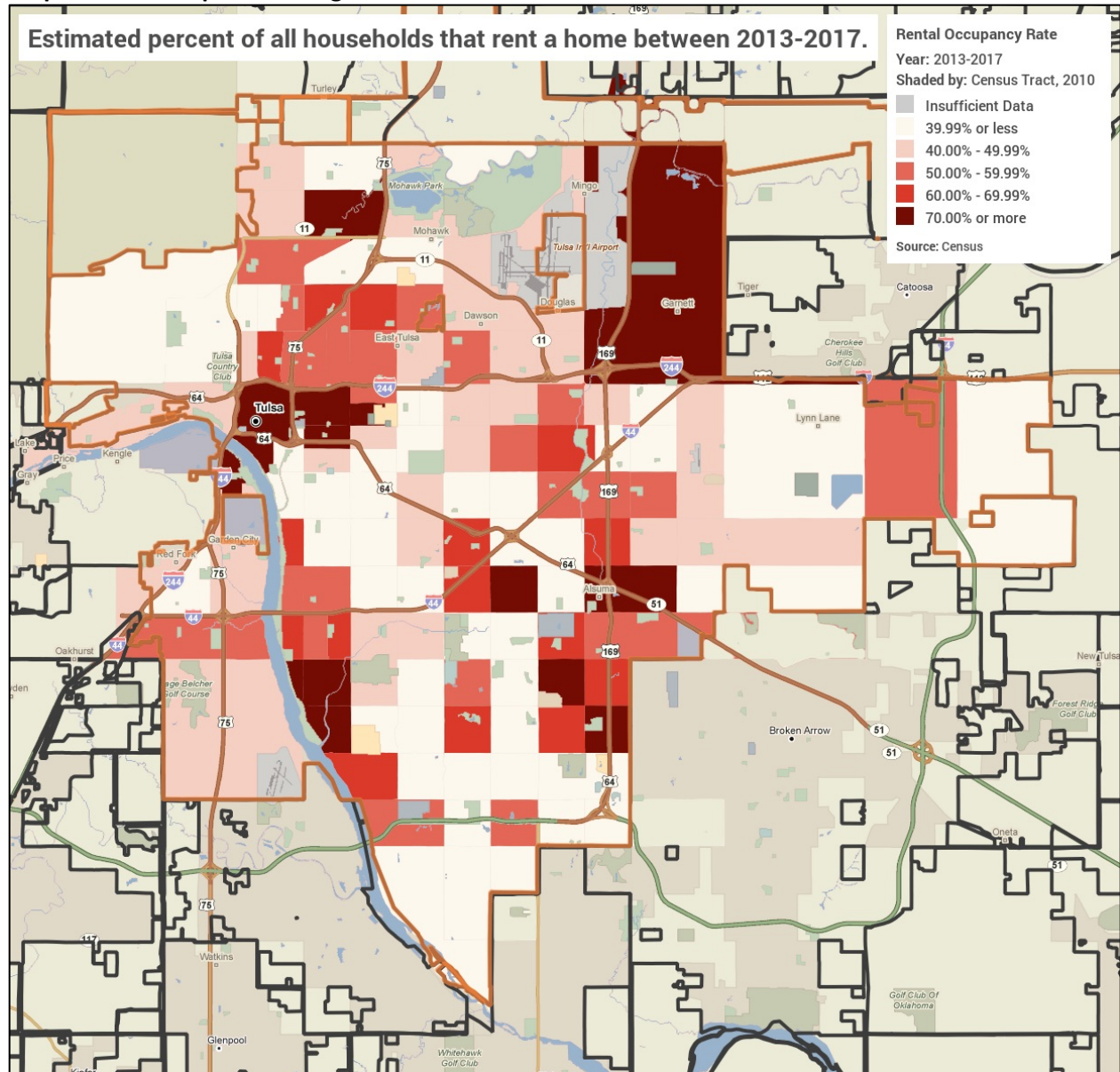
Map: Owner-occupied Housing Units in 2017



Source: 2013-2017 ACS via PolicyMap

The overall distribution of renter-occupied units is similar to owner-occupied with no clear geographic pattern. Many tracts have over 70% of their housing stock identified as renter-occupied and these tracts are scattered throughout the City.

Map: Renter-occupied Housing Units in 2017



Source: 2013-2017 ACS via PolicyMap

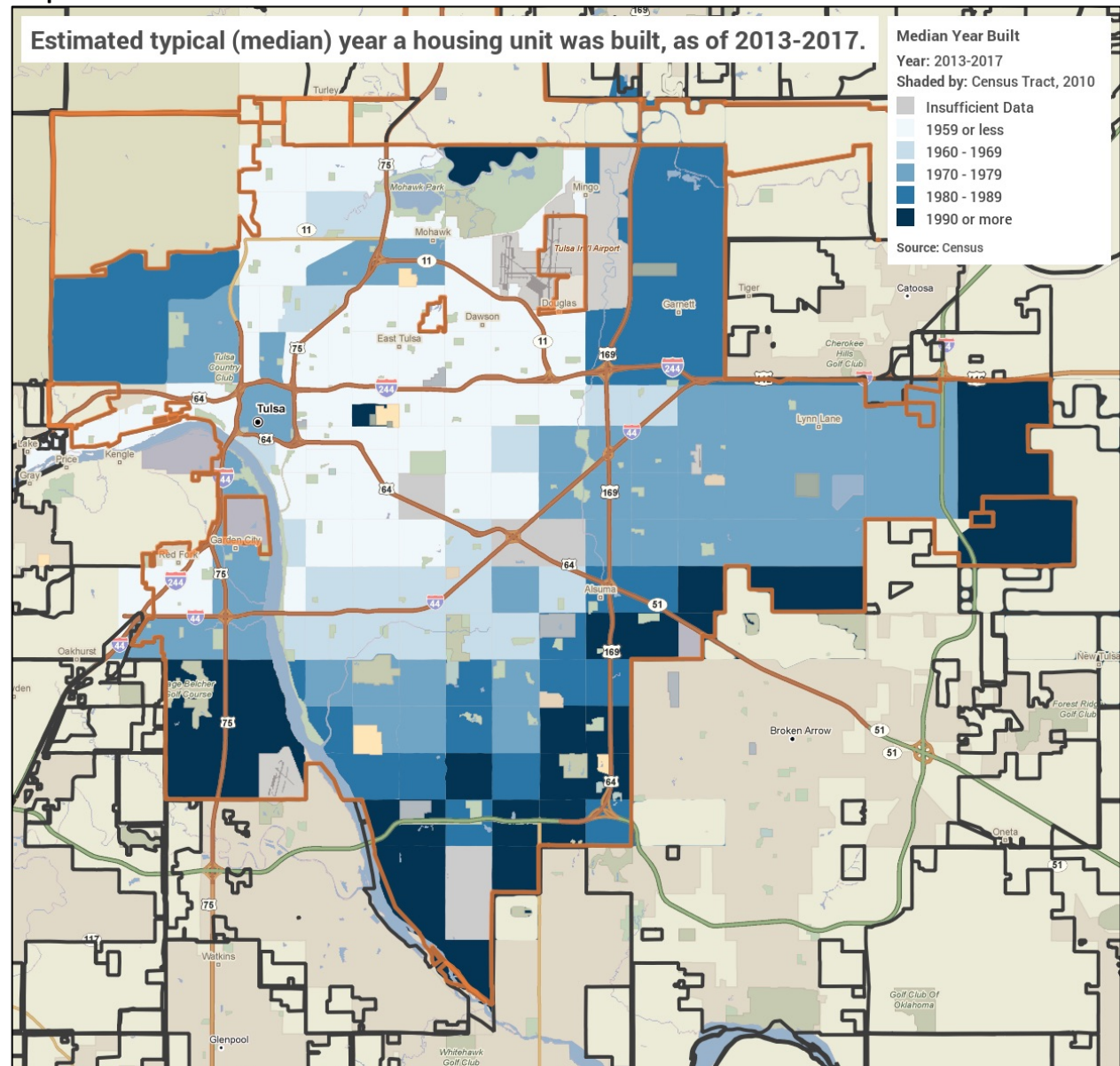
Age of Housing

The following table breaks down the available housing stock in Tulsa by the year it was built. Homes built prior to 1980 are at risk of having lead-based paint in them, creating a health hazard, particularly for children. Nearly 70% of the City's housing stock was built before 1980, which is 128,875 units. As these units age it is going to become increasingly necessary for remodeling and renovation, which will require lead remediation. If lower income residents live in these homes then they may need to ensure a safe living environment.

Table: Year Unit Built		
	Estimate	Percent
2010 or later	4,112	2.2%
2000 to 2009	11,867	6.3%
1990 to 1999	16,633	8.9%
1980 to 1989	25,668	13.7%
1970 to 1979	40,067	21.4%
1960 to 1969	27,587	14.7%
1950 to 1959	30,869	16.5%
1940 to 1949	12,316	6.6%
1939 or earlier	18,036	9.6%
Total	187,155	100.0%
Source: 2013-2017 ACS (DP04)		

Homes along the outside of the City, particularly to the south and east, are much newer than those in the City center. The median year built for the external areas is 1990 or more recent, while many of the homes in the downtown area were built prior to 1960. These older homes are primarily in the vicinity of lower income neighborhoods, as well as areas with large minority populations.

Map: Median Year Built



Source: 2013-2017 ACS via PolicyMap

Construction Activity

Since 2010, there has been a significant amount of housing construction permits issued in Tulsa. In general, most of the units are in large 5+ unit buildings and single-unit homes. The larger buildings provide new units at a much lower per-unit cost, often half or one-third the price of a single-unit building.

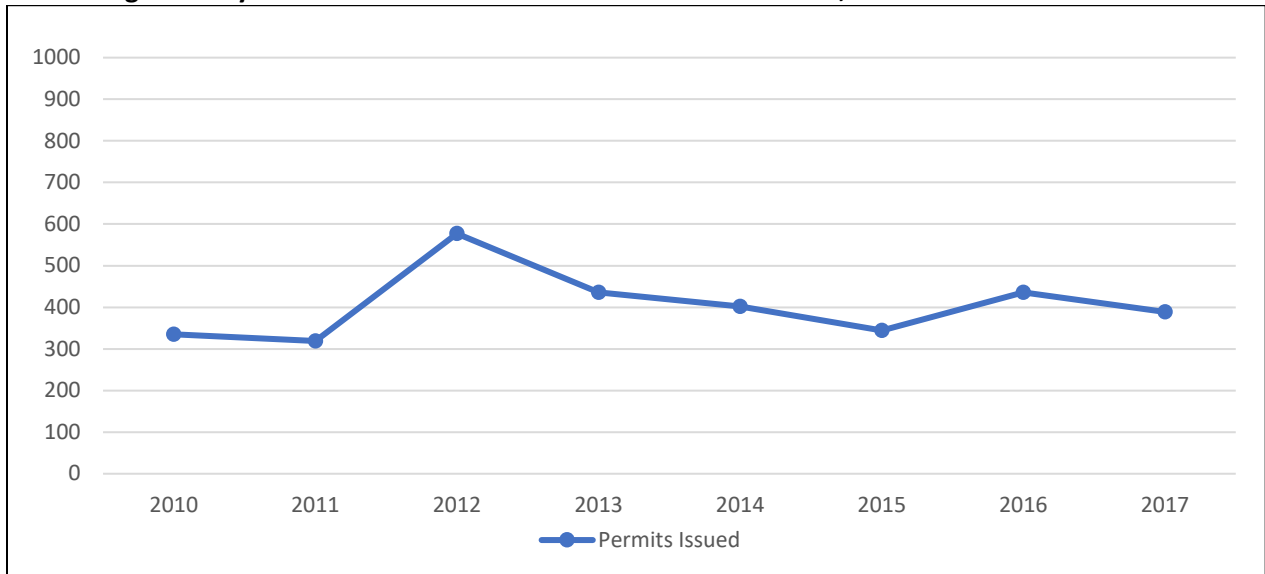
Table: Residential Construction Permits Issued in Tulsa, OK

	1-Unit		2-Units		3-4 Units		5+ Units		Total	
	#	PPU	#	PPU	#	PPU	#	PPU	#	PPU
2010	335	\$227,614	16	\$105,139	0	--	95	\$117,771	446	\$199,823
2011	319	\$226,999	32	\$83,446	0	--	756	\$80,438	1107	\$122,759
2012	577	\$198,431	0	--	0	--	594	\$92,278	1171	\$144,584
2013	436	\$241,266	0	--	60	\$72,779	104	\$103,993	600	\$200,623
2014	402	\$261,170	12	\$138,084	0	--	951	\$80,399	1365	\$134,144
2015	344	\$284,346	16	\$126,774	48	\$78,771	156	\$100,744	564	\$211,597
2016	436	\$241,175	28	\$71,000	32	\$90,385	354	\$46,641	850	\$148,875
2017	389	\$271,237	4	\$155,000	0	--	251	\$128,601	644	\$214,923

Source: US Census Bureau, Building Permits Survey
PPU = Price Per Unit

As this chart shows, over 300 single-unit construction permits were issued each year since 2010. The most permits issued was 577 in 2012 and the least issued was 319 in 2011.

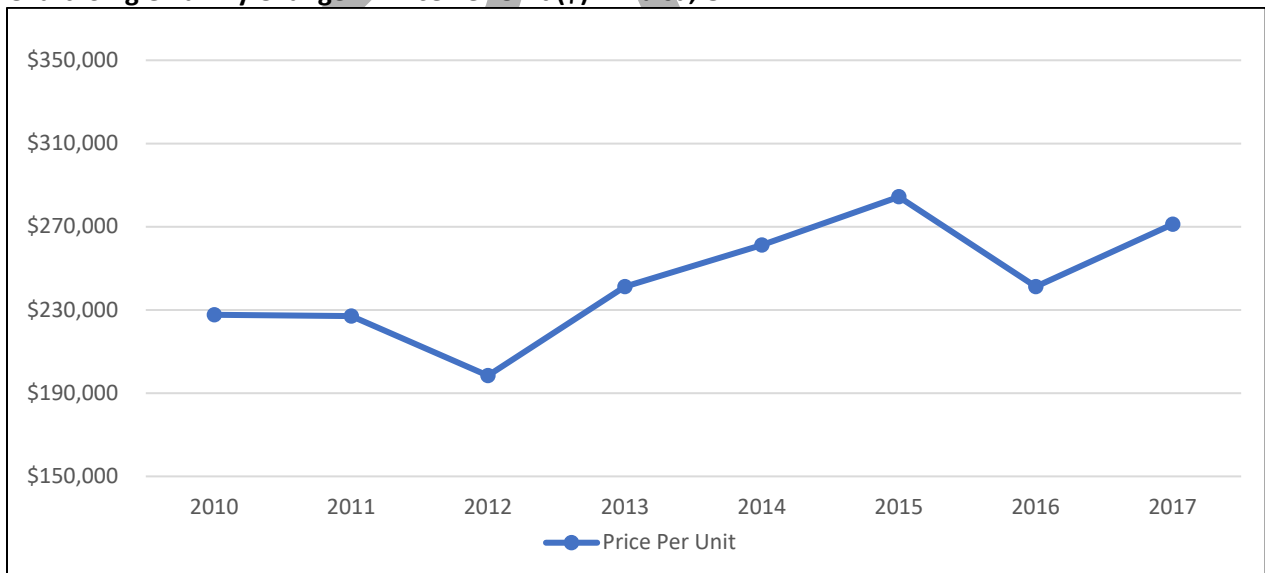
Chart: Single-Family Residential Construction Permits Issued in Tulsa, OK



Source: US Census Bureau, Building Permits Survey

The price per unit each year never fell below \$190,000 per unit. In 2015, it cost over \$284,000 to construct one unit of housing in this group.

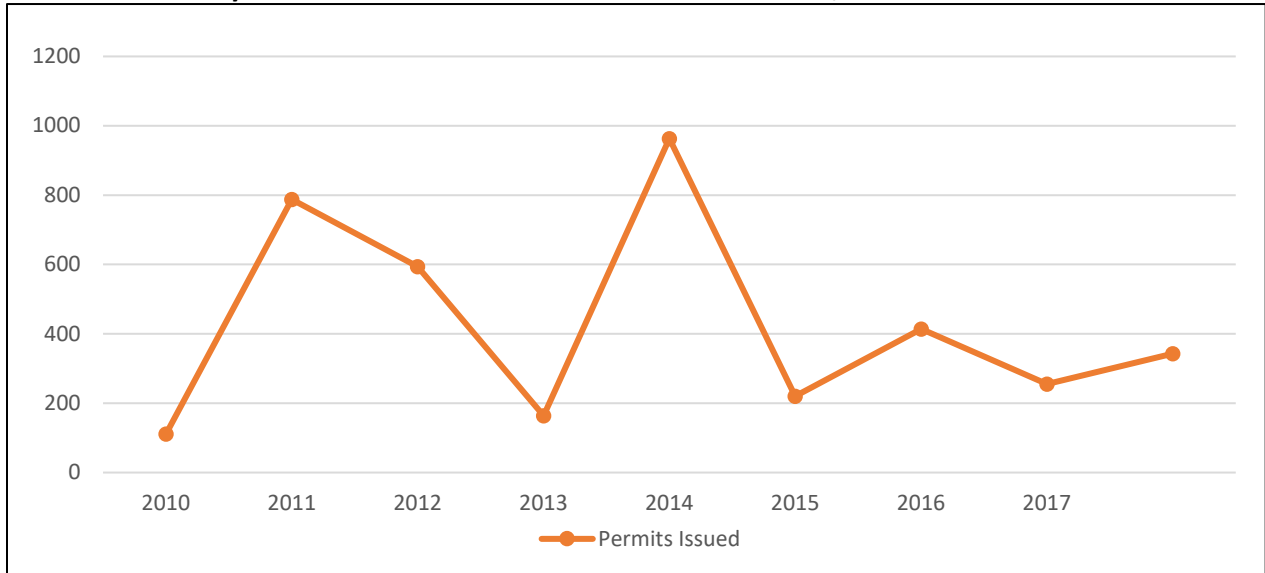
Chart: Single-Family Change in Price Per Unit (\$) in Tulsa, OK



Source: US Census Bureau, Building Permits Survey

Multi-family housing units were produced at a much less consistent rate than single-family. The number of permits issued varied from only 95 in 2010 to nearly 1,000 in 2014.

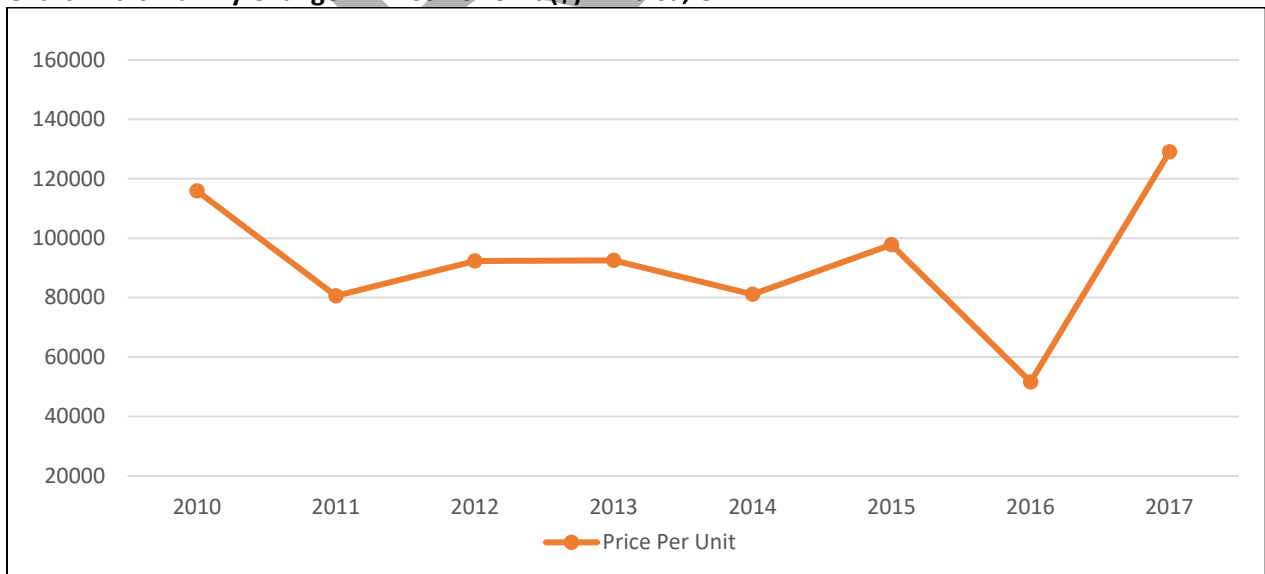
Chart: Multi-Family Residential Construction Permits Issued in Tulsa, OK



Source: US Census Bureau, Building Permits Survey

The price to produce one unit of housing in a multi-family complex is considerably less than to produce single-unit homes. Only in one year did the cost per unit rise over \$120,000 and in 2016 it was as low as \$46,641 per unit.

Chart: Multi-Family Change in Price Per Unit (\$) in Tulsa, OK



Source: US Census Bureau, Building Permits Survey

Vacant Housing

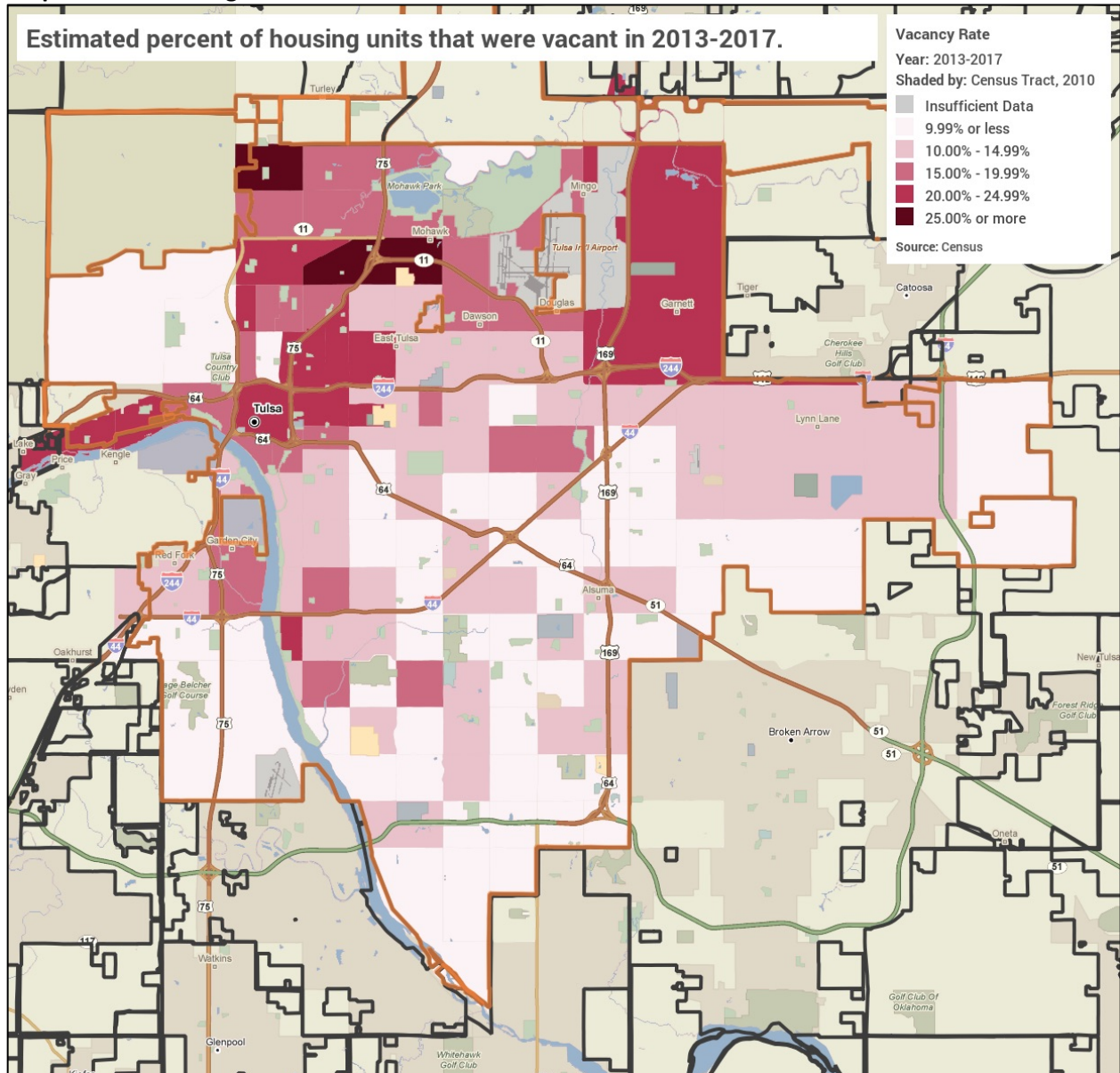
The number of vacant units in the City grew by over 2,000 since 2010. However, the type of housing units vacant varied significantly. Two types of homes, “Sold, not occupied” and “Other Vacant”, both saw an increase in the number of vacant units. “Other Vacant” grew by over 2,000 units and now makes up nearly 40% of the vacant housing stock. The number of units for rent grew by approximately 100 units while the number available for sale decreased by 50 units.

Table: Vacant Housing Units					
Tenure	2010		2017		% Change from 2010-2017
	Units	% of Total	Units	% of Total	
For rent	7,770	37.5	7,881	34.6	-7.7
Rented, not occupied	1,316	6.4	1,082	4.8	-25.0
For sale only	2,230	10.8	2,183	9.6	-11.1
Sold, not occupied	1,036	5.0	1,583	7.0	40.0
Seasonal, rec, occasional use	1,468	7.1	1,105	4.9	-30.1
For migrant workers	33	0.2	39	0.2	0.0
Other vacant	6,833	33.0	8,901	39.1	18.5
Total	20,686	100.0	22,774	100.0	--
Source: 2006-2010 ACS (B25004), 2013-2017 ACS (B25004)					

Housing vacancy is not itself a bad thing. Generally, a 7% vacancy rate is desired because this allows residents to move into new homes and provides available housing for people moving in. However, the growth in the number of “Other Vacant” units is of concern. These units tend to have problems that make it difficult to place them on the market. For example, they may be dilapidated or ownership is unclear.

Vacant housing units appear to be more common in the north part of the City, particularly in the northwest. Over 25% of all units are vacant in some of these areas. By contrast, areas to the southeast have vacancy rates of under 10%. Considering the age of the housing in these low vacancy areas it is likely the vacancy includes primarily properties that are available for rent or to be sold.

Map: Vacant Housing in 2017



Source: 2013-2017 ACS via PolicyMap

Household Size

The size of the average household in Tulsa increased since 2010. The number of both 1-person and 2-person households fell during this time period. Households with at least four people grew the most by over 1,600 people, or by 5.5%

Table: Household Size					
Number of Persons	2010		2017		% Change 2010-2017
	Estimate	Percent	Estimate	Percent	
Occupied Housing Units	164,888	--	164,381	--	--
1-person household	59,525	36.1%	57,786	35.2%	-2.9%
2-person household	53,754	32.6%	52,935	32.2%	-1.5%
3-person household	22,260	13.5%	22,537	13.7%	1.2%
4-person household or more	29,515	17.9%	31,123	18.9%	5.5%
Source: 2006-2010 ACS (S2501) 2013-2017 ACS (S2501)					
Data note: % change is by change in percentage.					

As noted above in the Construction Activity section, single-unit and large 5+ units were the most common new construction in Tulsa. Properties with 10 or more units grew by approximately 2,500 since 2010 while the number of properties with 3 to 9 units shrank.

Table: Properties by Type					
Type	2010		2017		% Change 2010-2017
	Estimate	Percent	Estimate	Percent	
1-unit, detached	117,217	63.2%	116,578	62.3%	-1.4%
1-unit, attached	5,584	3.0%	6,240	3.3%	10.0%
2 units	3,769	2.0%	3,743	2.0%	0.0%
3 or 4 units	9,521	5.1%	9,008	4.8%	-5.9%
5 to 9 units	14,806	8.0%	13,778	7.4%	-7.5%
10 to 19 units	15,921	8.6%	17,011	9.1%	5.8%
20 or more units	16,386	8.8%	17,840	9.5%	8.0%
Mobile home	2,293	1.2%	2,778	1.5%	25.0%
Boat, RV, van, etc.	77	0.0%	179	0.10%	n/a
Total	185,574	--	187,155	--	--
Source: 2006-2010 ACS (DP04), 2013-2017 ACS (DP04)					
Data note: % change is by change in percentage.					

Mobile homes grew the most when factoring in the percentage change from 2010 to 2017, however it should be noted that there is a much smaller number of these types of units available in the City, and a change of just a few hundred units may result in a large percentage change for this type of unit. While mobile homes had the largest percentage change at 25%, there were actually more units added in properties with 10 to 19 units and 20+ units with 1,090 and 1,454 units respectively.

Housing Problems

According to HUD (United States Department of Housing and Urban Development), a home is overcrowded if there is more than one person per room and a severely overcrowded home is one with 1.5 people or more per room. Overcrowding is not a significant problem in Tulsa. Approximately 3.2% of homes are overcrowded, up from 2.8% in 2010.

Table: Overcrowding and Severe Overcrowding					
Occupants Per Room	2010		2017		% Change from 2010-2017
	Estimate	Percent	Estimate	Percent	
Occupied housing units	164,888	--	164,381	--	--
1.00 or less	160,349	97.2%	159,166	96.8%	0.4%
1.01 to 1.50	3,550	2.2%	3,879	2.4%	9.1%
1.51 or more	989	0.6%	1,336	0.8%	33.3%
Source: 2006-2010 ACS (DP04), 2013-2017 ACS (DP04)					
Data note: % change is by change in percentage.					

If a home lacks complete plumbing or a complete kitchen that is considered a housing problem. Much like overcrowding, this is not a significant issue in Tulsa. Both the number of households without complete plumbing or complete kitchen facilities fell since 2010. Similarly, the number of homes that lacked telephone service decreased significantly.

Table: In-Complete Facilities					
Housing Problem	2010		2017		% Change from 2010-2017
	Estimate	Percent	Estimate	Percent	
Occupied housing units	164,888	--	164,381	--	--
Lacking complete plumbing	1,021	0.6%	434	0.3%	-50.0%
Lacking complete kitchen	1,581	1.0%	1,144	0.7%	-30.0%
No telephone service avail.	8,281	5.0%	5,053	3.1%	-38.0%
Source: 2006-2010 ACS (DP04), 2013-2017 ACS (DP04)					
Data note: % change is by change in percentage.					

The most common housing problem in Tulsa, as well as most of the country, is cost burden. When a household spends more than 30% of their income on housing they are considered cost burdened. Owner-occupied households with a mortgage have a relatively low rate of cost burden. Approximately 13,000 households in this group are cost burdened, or 25.9%.

Table: Selected Monthly Housing Costs of Owner's with a Mortgage		
	Estimate	Percent
Less than 20.0 percent	24,794	49.1%
20.0 to 24.9 percent	7,525	14.9%
25.0 to 29.9 percent	5,116	10.1%
30.0 to 34.9 percent	3,122	6.2%
35.0 percent or more	9,980	19.7%
Total	50,537	100.0%
Not computed	233	--
Source: 2013-2017 ACS (DP04)		

When a homeowner no longer has a mortgage the chance they are cost burdened drops significantly. For this group, only 12.4% of the households have this housing problem. That is approximately 4,000 households.

Table: Selected Monthly Housing Costs of Owner's Without a Mortgage		
	Estimate	Percent
Less than 10.0 percent	15,008	45.8%
10.0 to 14.9 percent	6,328	19.3%
15.0 to 19.9 percent	3,839	11.7%
20.0 to 24.9 percent	2,238	6.8%
25.0 to 29.9 percent	1,331	4.1%
30.0 to 34.9 percent	1,047	3.2%
35.0 percent or more	3,008	9.2%
Total	32,799	100.0%
Not computed	439	--
Source: 2013-2017 ACS (DP04)		

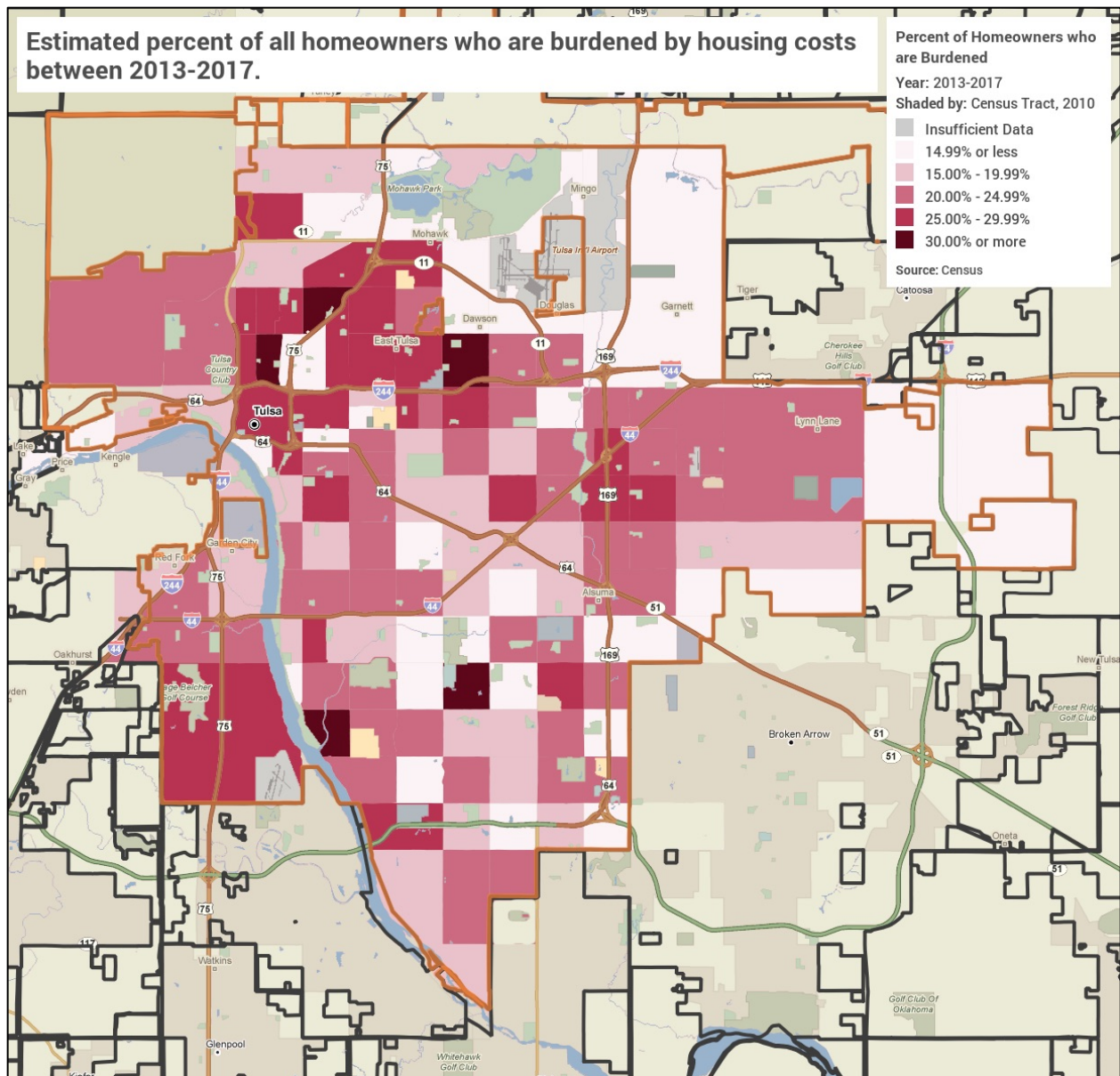
Renters, by far, face being cost burdened more than any other group. There are nearly 35,000 renters that are cost burdened, over 46% of all renters. The majority of these renters pay over 35% of their income to housing costs.

Table: Selected Monthly Housing Costs of Renters		
	Estimate	Percent
Less than 15.0 percent	10,910	14.6%
15.0 to 19.9 percent	10,364	13.8%
20.0 to 24.9 percent	10,339	13.8%
25.0 to 29.9 percent	8,401	11.2%
30.0 to 34.9 percent	5,901	7.9%
35.0 percent or more	28,926	38.6%
Total	74,841	100.0%
Not computed	5,532	--
Source: 2013-2017 ACS (DP04)		

When a household experiences housing cost burden, and pays a disproportionate amount of their income towards housing costs, it can become a challenge to afford other basic needs as well such as food and healthcare. The City of Tulsa partnered with Gallup in 2018 to conduct a citywide survey to track its progress in improving the quality of life of its residents among a number of indicators such as housing, healthcare and other basic needs. This survey, called the 2018 Gallup-Tulsa Citivoice Index Results, indicated that nearly one-third of residents said that there have been times in the past 12-months when they didn't have enough money to buy food. Over a third of residents also said they did not have money to pay for healthcare or medicine for their families. With a significant portion of Tulsa's residents experiencing cost burden and challenges to afford food and healthcare, access to basic needs remains a primary challenge for the City.

There is not a clear pattern of cost burdened homeowners throughout the City. It does appear that it is slightly more common in the northwest but tracts with relatively low or high rates of cost burden are found throughout the City.

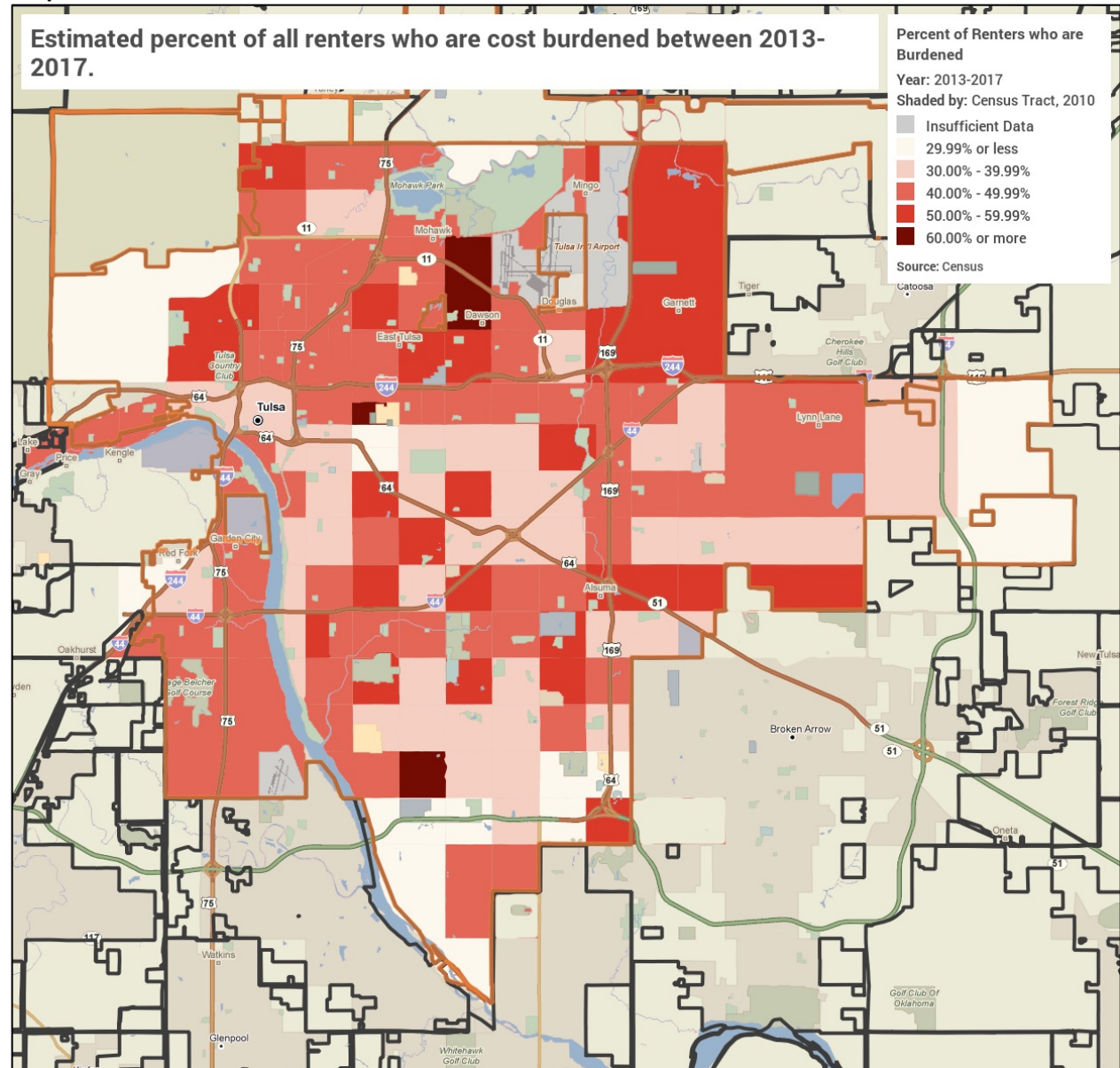
Map: Cost Burdened Homeowners in 2017



Source: 2013-2017 ACS via PolicyMap

Renters who are cost burdened are also spread throughout the City. Tracts that have 50% or more of their renters facing this housing problem are all over the City while tracts with fewer than 30% are fairly uncommon.

Map: Cost Burden Renters in 2017



Source: 2013-2017 ACS via PolicyMap

Housing Costs

The median value of a home in Tulsa increased by approximately 10% since 2010 and is currently \$129,000. The median contract rent in the City increased by more than 18% from \$533 to \$630. The number of owner-occupied units decreased by 5,000 while the number of renter-occupied increased by a similar amount.

Table: Median Housing Costs			
	2010	2017	Percent Change
Owner Occupied Units	89,662	84,008	-6.3%
Median Home Value (dollars)	\$117,000	\$129,000	10.3%
Renter Occupied Units	71,692	76,876	7.2%
Median Contract Rent	\$533	\$630	18.2%
Source: Owners 2006-2010 ACS (DP4), 2013-2017 ACS (DP04), Renters 2006-2010 ACS (DP04, B25058), 2013-2017 ACS (DP04, B25058)			
Note: Occupied units paying rent.			

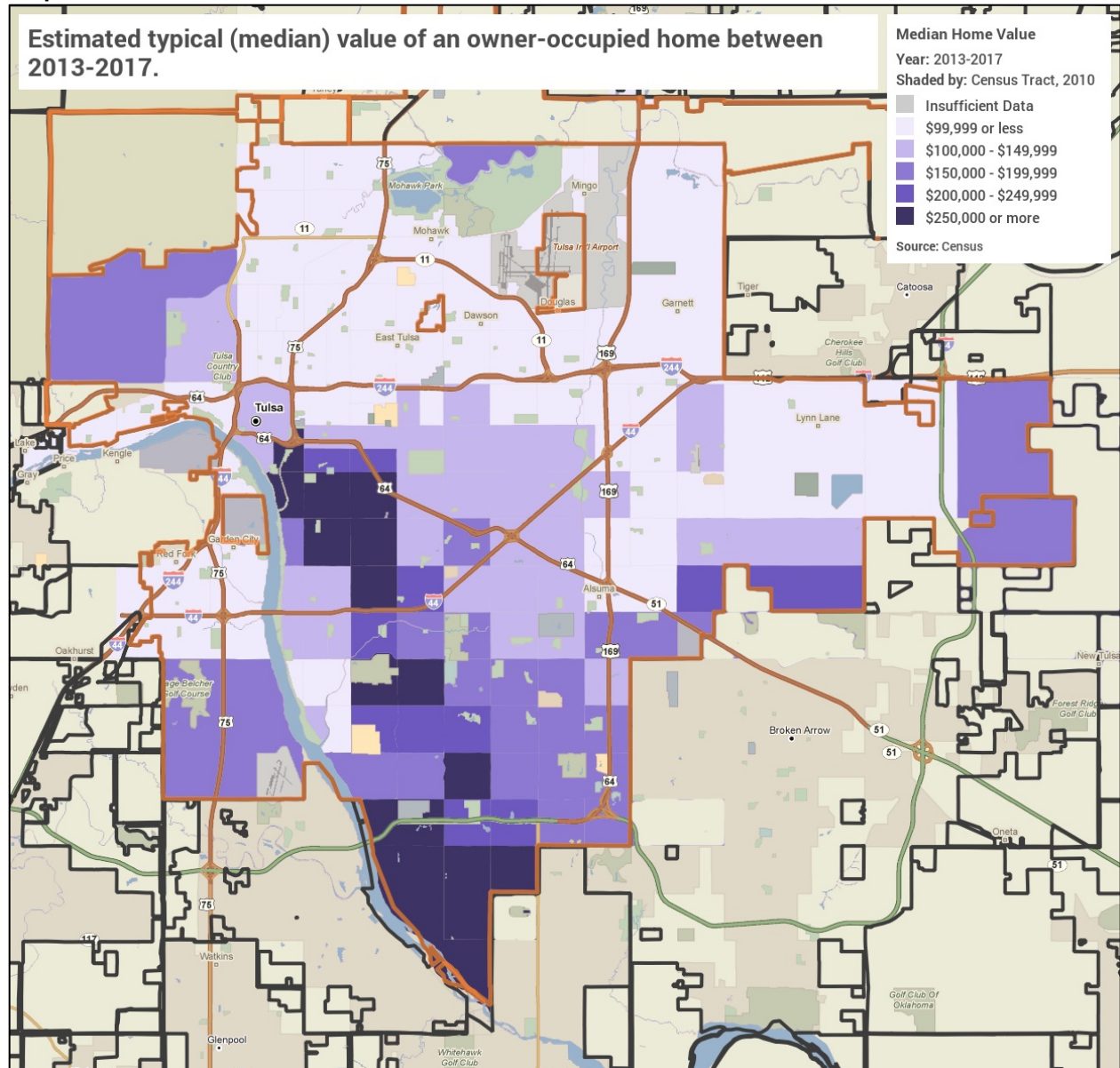
Even with the increase in rental units over the past several years, rent has continued to climb significantly. This indicates that demand is still high for rental units, and there is a need for affordable units as renters, by far, are cost burdened more than any other group. There are nearly 35,000 renters that are cost burdened, over 46% of all renters.

Still however, there are several reasons that make renting attractive in Tulsa. The City conducted a survey for the Housing Market Demand Study & Strategy released in September 2019, which focused on the downtown Study Area within the City. In this survey, 27% of respondents interested in moving into the Study Area preferred to rent their next home. The top three reasons were advantages like property management and maintenance, flexibility and affordability. Other reasons identified for rental preference were home purchase down payment requirements were too high, a lack of credit and they didn't enough savings yet to buy, which point to the difficulties of homebuying.

The City's Study Area consists of downtown and the immediate surrounding neighborhoods of Owen Park, Crosbie Heights, Legacy/Brady Heights, Greenwood/University Park, Dunbar/Joe Louis, Crutchfield, the Pearl District Area, and Riverview/Cherry Street.

Homes in Tulsa are significantly more valuable in the southwestern part of the City. Many tracts in this area have a median home value of over \$250,000. The northern and eastern tracts have a much lower median home value, usually under \$100,000.

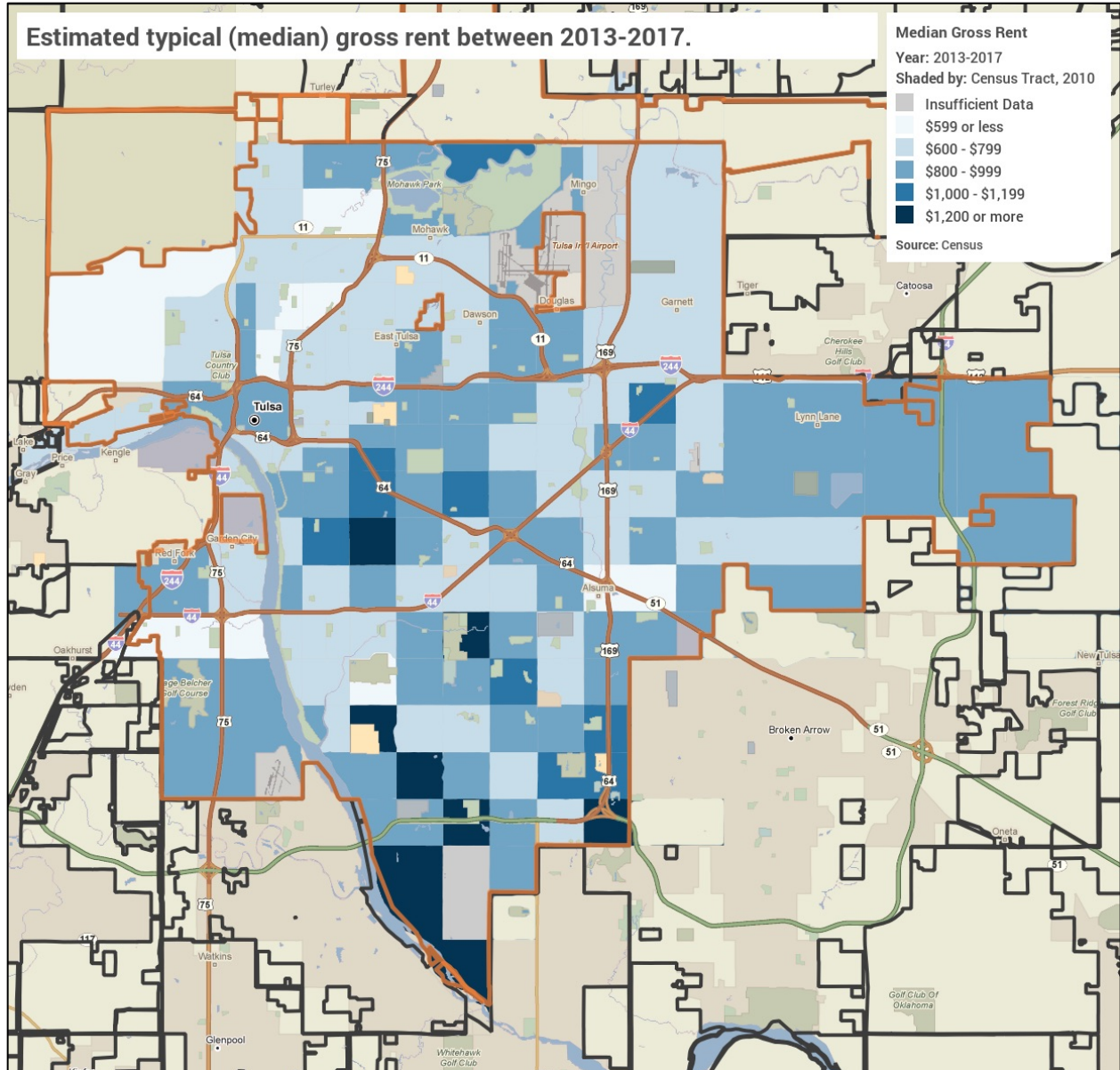
Map: Median Home Values in 2017



Source: 2013-2017 ACS via PolicyMap

Similar to the above map, the median rent in the City appears to be higher in the southern tracts. However, the difference in median rent does not vary as much by location as home value. Most tracts in the City have a median rent between \$600 and \$1,000 per month.

Map: Median Rent in 2017



Source: 2013-2017 ACS via PolicyMap

SECTION IV. FAIR HOUSING LAWS AND GUIDANCE

Federal Fair Housing Laws

Federal laws provide the backbone for U.S. fair housing regulations. While some laws have been previously discussed in this report, a brief list of laws related to fair housing, as defined on the U.S. Department of Housing and Urban Development's (HUD's) website, is presented below:

Fair Housing Act Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing related transactions, based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and persons securing custody of children under the age of 18), and handicap (disability).

Title VIII was amended in 1988 (effective March 12, 1989) by the Fair Housing Amendments Act. In connection with prohibitions on discrimination against individuals with disabilities, the Act contains design and construction accessibility provisions for certain new multi-family dwellings developed for first occupancy on or after March 13, 1991.

Title VI of the Civil Rights Act of 1964. Title VI prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance.

Section 504 of the Rehabilitation Act of 1973. Section 504 prohibits discrimination based on disability in any program or activity receiving federal financial assistance.

Section 109 of the Housing and Community Development Act of 1974. Section 109 prohibits discrimination on the basis of race, color, national origin, sex or religion in programs and activities receiving financial assistance from HUD's Community Development and Block Grant Program.

Title II of the Americans with Disabilities Act of 1990. Title II prohibits discrimination based on disability in programs, services, and activities provided or made available by public entities. HUD enforces Title II when it relates to state and local public housing, housing assistance and housing referrals.

Architectural Barriers Act of 1968. The Architectural Barriers Act requires that buildings and facilities designed, constructed, altered, or leased with certain federal funds after September 1969 be accessible to and useable by handicapped persons.

Age Discrimination Act of 1975. The Age Discrimination Act prohibits discrimination on the basis of age in programs or activities receiving federal financial assistance.

Title IX of the Education Amendments Act of 1972. Title IX prohibits discrimination on the basis of sex in education programs or activities that receive federal financial assistance.

Fair Housing Related Presidential Executive Orders

Executive Order 11063. Executive Order 11063 prohibits discrimination in the sale, leasing, rental, or other disposition of properties and facilities owned or operated by the federal government or provided with federal funds.

Executive Order 11246. Executive Order 11246, as amended, bars discrimination in federal employment because of race, color, religion, sex, or national origin.

Executive Order 12892. Executive Order 12892, as amended, requires federal agencies to affirmatively further fair housing in their programs and activities, and provides that the Secretary of HUD will be responsible for coordinating the effort. The Order also establishes the President's Fair Housing Council, which will be chaired by the Secretary of HUD.

Executive Order 12898. Executive Order 12898 requires that each federal agency conduct its program, policies, and activities that substantially affect human health or the environment in a manner that does not exclude persons based on race, color, or national origin.

Executive Order 13166. Executive Order 13166 eliminates, to the extent possible, limited English proficiency as a barrier to full and meaningful participation by beneficiaries in all federally-assisted and federally conducted programs and activities.

Executive Order 13217. Executive Order 13217 requires federal agencies to evaluate their policies and programs to determine if any can be revised or modified to improve the availability of community-based living arrangements for persons with disabilities.

State and Local Fair Housing Laws

In addition to federal law, citizens of the City of Tulsa are also protected from discrimination in the housing market by Oklahoma Statutes §25-1452, which expands upon the list of protections guaranteed in the Fair Housing Act to prohibit discrimination based on age. In addition, §5-104 of the Tulsa Code of Ordinances prohibits discrimination on all of the bases recognized under the FHA, and extends additional protections based on ancestry and marital status. The ordinance also protects against discrimination in housing based on gender identity and sexual orientation. A recent study, “Discrimination Against LGBT People in Oklahoma” by the UCLA School of Law offers research and recommendations on additional protections needed for LGBT people in the state.

SECTION V. REVIEW OF THE EXISTING FAIR HOUSING STRUCTURE AND FAIR HOUSING COMPLAINTS, 2015-2018

The purpose of this section is to provide a profile of fair housing in the City of Tulsa based on a number of factors, including an enumeration of key agencies and organizations that contribute to affirmatively furthering fair housing, evaluation of the presence and scope of services of existing fair housing organizations, and a review of the complaint process. The purpose of this section is to provide a profile of fair housing in the City of Tulsa based on a number of factors, including an enumeration of key agencies and organizations that contribute to affirmatively furthering fair housing, evaluation of the presence and scope of services of existing fair housing organizations, and a review of the complaint process.

Federal Agencies

U.S. Department of Housing and Urban Development

The U.S. Department of Housing and Urban Development (HUD) oversees, administers, and enforces the federal Fair Housing Act. HUD's regional office in Fort Worth oversees housing, community development, and fair housing enforcement in Arkansas, Louisiana, New Mexico, Oklahoma, and Texas.

Contact information for HUD is listed below:

Address:

Office of Fair Housing and Equal Opportunity
Department of Housing and Urban Development
451 Seventh Street SW, Room 5204
Washington, DC 20410-2000

Telephone: (202) 708-1112 Toll Free: (800) 669-9777

Web Site: <http://www.HUD.gov/offices/fheo/online-complaint.cfm>

The contact information for the regional HUD office in Fort Worth is:

Address

Fort Worth Regional Office of FHEO
U.S. Department of Housing and Urban Development
801 Cherry Street, Unit #45 Suite 2500
Fort Worth, Texas 76102

Telephone: (817) 978-5900 Toll Free: (800) 669-9777 TTY: (817) 978-5595

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

State Agencies

State of Oklahoma Attorney General's Office of Civil Rights

Enforcement Violations of Oklahoma's anti-discrimination statute are investigated and prosecuted by the state Attorney General's Office of Civil Rights Enforcement. In the event that the Attorney General's (AG)

investigation establishes that there is reasonable cause to believe that a complaint represents a true instance of discrimination, the AG is authorized by statute to file a civil action on behalf of the aggrieved party.

The Office of Civil Rights Enforcement may be contacted through the following information:

Oklahoma Attorney General's Office
Office of Civil Rights Enforcement
15 W. 6th Street, Suite 1000
Tulsa, Okla. 74119
Office: (918) 581-2342
Fax: (918) 938-6348
Email: ocre.complaints@oag.ok.gov
Website: <http://www.oag.ok.gov/civil-rights-enforcement-unit>
Complaint Forms: <http://oag.publishpath.com/Default.aspx?shortcut=civil-rights-enforcement-complaint-forms>

Local Agencies

City of Tulsa Mayor's Office of Resilience and Equity

The City of Tulsa Mayor's Office of Resilience and Equity (MORE) works to achieve equality for all Tulsans through partnership building, education cultural awareness, and advocacy. The office is charged with implementing a broad strategy to promote resilience and equity in Tulsa in all aspects of city life from employment, economic development, health, mental health, and human rights. MORE also oversees the complaint and investigation process for Tulsans who experience discrimination in housing.

MORE may be contacted by telephone at (918) 596-7411 or email at resilient@cityoftulsa.org.

City Hall of Tulsa
175 East 2nd Street 15th Floor
Tulsa, Oklahoma 74103

Nonprofit Organizations

Metropolitan Fair Housing Council of Oklahoma

The Metropolitan Fair Housing Council of Oklahoma (MFHC) is an Oklahoma City-based nonprofit organization that provides fair housing services to Oklahoma residents. Such services include fair housing counseling, investigation and testing, mediation services, and legal and complaint referral. As part of its complaint referral services, the organization facilitates the filing of housing complaints with HUD and serves as an advocate for the complaint throughout the complaint and investigatory process.

The MFHC can be contacted through the following:

Metropolitan Fair Housing Council of Oklahoma, Inc.
312 Northeast 28th Street, Suite 112

Oklahoma City, OK 73105
Toll Free: 1-866-677-7541
Local: (405) 232-3247
FAX: (405) 232-5119

Legal Aid Services of Oklahoma

Legal Aid Services of Oklahoma serves Oklahoma residents as part of their mission to be a “partner in the community making equal justice for all a reality.” A non-profit law firm that provides legal assistance to low-income residents and seniors with civil legal problems, Legal Aid offers a range of services that include assistance to individuals who believe that they have been subject to discrimination in the housing market.

The contact information for the local Tulsa office is as follows:

Legal Aid Services, Tulsa Law Office
907 South Detroit Avenue, Suite 725
Tulsa, Oklahoma
Telephone: (918) 584-3338 or 1 (800) 299-3338
Fax: (918) 584-3060

Tulsa Area Fair Housing Partnership

The Tulsa Area Fair Housing Partnership includes member organizations in the Tulsa area. The mission of the Partnership is to increase the “availability and accessibility of affordable and quality housing for individuals and families” in and around Tulsa, regardless of the race, ethnicity, religion, sex, disability, familial status, or national origin of the person or family seeking housing. The goal of the Partnership is to increase public awareness of fair housing rights, “foster an understanding of why discrimination is harmful”, and to insure that area residents enjoy their right to fair housing choice.

Current members of the Partnership are as follows:

- Legal Aid Services of Oklahoma, Inc.
- Tulsa Health Department
- Housing Partners of Tulsa
- Community Service Council
- City of Tulsa
- Metro Fair Housing
- Greater Tulsa Association of Realtors
- Spirit Bank
- Tulsa Apartment Association
- U.S. Dept. of Housing and Urban Development

In service of its mission and goals to promote fair housing choice in the Tulsa area, the Partnership holds housing workshops and seminars throughout the year to “educate the public and industry professionals.”

Complaint Process for Fair Housing Agencies

U.S. Department of Housing and Urban Development

From a federal perspective, HUD is committed to assist with any problem involving housing discrimination. Complaints filed with HUD are investigated by the Office of FHEO. If the complaint is not successfully conciliated, the FHEO determines whether reasonable cause exists to believe that a discriminatory housing practice has occurred. Anyone who believes their rights have been violated has several options available in which to file a complaint. Those who feel that they have been discriminated against may complete an online complaint form and submit, or write HUD a letter, or simply telephone the HUD office nearest to them. Regardless of the method of contact, all complaints must be filed on later than one year after an alleged violation. HUD encourages all complaints to be filed it as soon as possible.

The following information was taken directly from HUD's website located at: www.hud.gov and outlines HUD's Fair Housing complaint process.

Required Information by HUD:

- Name and address (Your contact Information)
- The name and address of the person the complaint is against (the respondent)
- The address or other identification to the housing involved
- A short description to the alleged violation (the event that caused you to believe your rights were violated)
- The date(s) of the alleged violation

Contact Information:

Send the Housing Discrimination Complaint form or a letter to the nearest HUD office or call that office directly. For Oklahoma, Arkansas, Louisiana, New Mexico, and Texas:

Fort Worth Regional Office of FHEO
U.S. Department of Housing and Urban Development
801 Cherry Street, Unit #45 Suite 2500
Fort Worth, Texas 76102
Telephone (817) 978-5900; Toll Free 1-800-669-9777
TTY (817) 978-5595

Disabled Contact Information:

HUD also provides a toll-free TTY phone for the hearing impaired: 1-800-927-9275. HUD can provide interpreters along with furnishing tapes and Braille materials as required.

Complaint Process:

HUD will notify you when it receives your complaint. Normally, HUD also will:

- Notify the alleged violator of your complaint and permit that person to submit an answer
- Investigate your complaint and determine whether there is reasonable cause to believe the Fair Housing Act has been violated
- Notify you if it cannot complete an investigation within 100 days of receiving your complaint.

Conciliation

HUD will try to reach an agreement with the person your complaint is against (the respondent). A conciliation agreement must protect both you and the public interest. If an agreement is signed, HUD will take no further action on your complaint. However, if HUD has reasonable cause to believe that a conciliation agreement is breached, HUD will recommend that the Attorney General file suit.

Complaint Referrals

If HUD has determined that your State or local agency has the same fair housing powers as HUD, HUD will refer your complaint to that agency for investigation and notify you of the referral. That agency must begin work on your complaint within 30 days or HUD may take it back.

What if You Need Help Quickly?

If you need immediate help to stop a serious problem that is being caused by a Fair Housing Act violation, HUD may be able to assist you as soon as you file a complaint. HUD may authorize the Attorney General to go to court to seek temporary or preliminary relief, pending the outcome of your complaint, if:

- Irreparable harm is likely to occur without HUD's intervention
- There is substantial evidence that a violation of the Fair Housing Act occurred Example: A builder agrees to sell a house but, after learning the buyer is black, fails to keep the agreement. The buyer files a complaint with HUD. HUD may authorize the Attorney General to go to court to prevent a sale to any other buyer until HUD investigates the complaint.

What Happens after a Complaint Investigation?

If, after investigating your complaint, HUD finds reasonable cause to believe that discrimination occurred, it will inform you. Your case will be heard in an administrative hearing within 120 days, unless you or the respondent wants the case to be heard in Federal district court. Either way, there is no cost to you.

The Administrative Hearing

If your case goes to an administrative hearing, HUD attorneys will litigate the case on your behalf. You may intervene in the case and be represented by your own attorney if you wish. An Administrative Law Judge (ALA) will consider evidence from you and the respondent. If the ALA decides that discrimination occurred, the respondent can be ordered:

- To compensate you for actual damages, including humiliation, pain and suffering.
- To provide injunctive or other equitable relief, for example, to make the housing available to you.
- To pay the Federal Government a civil penalty to vindicate the public interest. The maximum penalties are \$16,000 for a first violation and \$65,000 for a third violation within seven years.

- To pay reasonable attorney's fees and costs.

Federal District Court

If you or the respondent chooses to have your case decided in Federal District Court, the Attorney General will file a suit and litigate it on your behalf. Like the ALA, the District Court can order relief, and award actual damages, attorney's fees and costs. In addition, the court can award punitive damages.

You May File Suit

You may file suit, at your expense, in Federal District Court or State Court within two years of an alleged violation. If you cannot afford an attorney, the Court may appoint one for you. You may bring suit even after filing a complaint, if you have not signed a conciliation agreement and an Administrative Law Judge has not started a hearing. A court may award actual and punitive damages and attorney's fees and costs.

Other Tools to Combat Housing Discrimination

If there is noncompliance with the order of an Administrative Law Judge, HUD may seek temporary relief, enforcement of the order or a restraining order in a United States Court of Appeals. The Attorney General may file a suit in a Federal District Court if there is reasonable cause to believe a pattern or practice of housing discrimination is occurring.

Oklahoma Attorney General's Office of Civil Rights Enforcement

The Office of Civil Rights Enforcement is empowered by §25-1501 of the Oklahoma Statutes to "receive, investigate, seek to conciliate, hold hearings on, and pass upon complaints alleging violations of [§25-1101 et seq.]." Those who claim to have been subjected to unlawful discrimination in the housing market may file a complaint with the Attorney General within a year after the alleged discriminatory action.

Once the complaint has been filed, the Commission or one of its representatives will notify the person against whom the complaint is directed (the "respondent") that a complaint has been filed against him or her. The respondent then has ten days to respond to the complaint.

Once a complaint has been lodged with the state AG, the OCRE will conduct an investigation of the facts alleged in the complaint. At the same time, the AG will attempt to bring the parties together in conciliation of the complaint. If the conciliation attempt is successful, the AG will end the investigation.

If there is no conciliation between the parties, the AG will issue its findings on whether or not there is reasonable cause to believe that discrimination has occurred. If the AG finds no such cause, it will dismiss the complaint. If the AG determines that the respondent has committed unlawful discriminatory acts against the complainant, or is about to do so, he or she may file a civil action on behalf of the aggrieved party. In such a civil action, the complainant may be entitled to punitive damages, reasonable attorney's fees, court costs, and an order enjoining the respondent from continuing the discriminatory policy at issue in the complaint, along with "appropriate affirmative action."

Mayor's Office of Resilience and Equity of the City of Tulsa

Tulsa residents who wish to file a housing discrimination complaint with the Tulsa Human Rights Commission must do so within 180 days of the alleged discriminatory act. Complaints are filed with the City Clerk and the Compliance Officer, which is within the Mayor's Office of Resilience and Equity (MORE) to oversee the complaint and investigation process regarding the city's anti-discrimination statutes. Once the complaint is filed, the person against whom the complaint is directed is notified of the complaint. He or she may file an answer within ten days of such notification.

Once the complaint has been filed, the Compliance Officer will conduct an investigation to determine whether or not there is probable cause to believe that discrimination has occurred. This investigation must be made within 60 days after the filing of a complaint. If the Compliance Officer finds that there is no cause to believe that discrimination has occurred, he or she will dismiss the complaint. If he or she finds probable cause to believe that discrimination has occurred, the Compliance Officer will notify both the complainant and respondent and attempt to broker a conciliation agreement between the two parties. If a conciliation agreement is not forthcoming, the complaint and results of the investigation may be referred to an appropriate state or federal agency. Alternately, the Compliance Officer may relate the findings of the investigation to the Manager of the Criminal Division of the Legal Department.

Metropolitan Fair Housing Council of Oklahoma

When a fair housing complaint is lodged with the Metropolitan Fair Housing Council (MFHC), the organization initiates the complaint referral process by conducting a screening interview, gathering case notes, and entering details of the allegation into a database. After gathering supporting documentation and respondent information, MFHC's Fair Housing staff will conduct a case review to determine whether or not the complaint has standing.

If the organization determines that the complaint does not represent a bona fide allegation, it will refer the matter for landlord/tenant counseling or to other available resources. In the event that the Fair Housing staff determines that a complaint amounts to a bona fide fair housing allegation, it will hold a case review with the Executive Director, the Enforcement Staff, and/or the MFHC General Council to decide on an appropriate follow-up action.

Follow up actions potentially include a request for reasonable accommodation or reasonable modification for a complainant with a disability, fair housing testing, referral of the matter to Legal Aid or a cooperating attorney, and the filing of an administrative complaint with HUD. In the latter case, the MFHC will continue to serve as an advocate for the complainant during the HUD administrative process.

A request for reasonable accommodation or modification, if successful, can lead to the closure of the complaint. If the request is not successful, the matter will be referred to HUD after a final case review by MFHC. Complaints that are referred for fair housing testing will also be reviewed by MFHC and referred to HUD. Complaints that are referred to Legal Aid or a cooperating attorney may be resolved, or may end in a lawsuit, trial, and/or settlement.

Fair Housing Complaints

The City collected fair housing complaint data from HUD and local agencies. The information received is summarized below. It should be noted that based on the information received, the City cannot fully assess the extent to which this data duplicates complaints.

U.S. Department of Housing and Urban Development

Analysis of fair housing complaints submitted to HUD between 2015 and 2018 from residents of the City of Tulsa reveals that 52 complaints were filed between 2015 and 2018 with some complaints citing multiple bases for their claims. The table below shows the number of complaints filed in each year with the most active year in 2016.

Table: HUD Fair Housing Complaints - Number of complaints filed per year

Year	Number of Complaints
2015	6
2016	25
2017	7
2018	14
TOTAL	52

The analysis further revealed that disability followed by race are by far the most commonly cited bases for complaints with disability cited in about 65.4% of the bases across all complaints and race cited at a rate of about 23.1%. Other bases cited include national origin (5.8%), sex (3.8%), and Familial Status (1.9%). The table below shows how many times each basis was cited in each year between 2015 and 2018.

Table: HUD Fair Housing Complaints - Number of times basis for complaint was cited per year

Basis for Complaint	2015	2016	2017	2018	TOTAL
Race	0	4	4	4	12
Disability	5	20	2	7	34
National Origin	1	1	1	0	3
Sex	0	0	0	2	2
Familial Status	0	0	0	1	1

Among disability complaints, 32 of the 34 complaints between 2015 and 2018 cited failure to make or allow reasonable accommodations as a basis for their complaint.

Of the 52 complaints filed between 2015 and 2018, 21 (40.4%) were closed with conciliation or a successful settlement. The remainder were either withdrawn, had a non-responsive or uncooperative complainant, or a no cause determination.

City of Tulsa

The City of Tulsa received several complaints each between 2015 through 2018. These complaints and their outcomes were reported in each year's annual CAPER. A summary of the complaints are described below. As shown in the summaries, disability complaints were the most common complaints filed between 2015-2018.

Table: City Fair Housing Complaints - Number and basis cited per year

Year	Number of Complaints	Basis of Complaints
2015	5	ADA Accessibility (4) Sexual Orientation (1)
2016	2	Reasonable Accommodation (1) Denial of Housing (1)
2017	4	Reasonable Accommodation (3) Limited Handicap Spacing (1)
2018	3	Reasonable accommodation (1) Age Discrimination (1) Denied public housing application (1)

Metropolitan Fair Housing Council of Oklahoma

MFHC received more than 102 complaint intakes/inquiries originating from Tulsa between 2013 and 2018 from its HUD/Fair Housing Initiatives Program (FHIP) Private Enforcement Initiatives (PEI) statewide fair housing program. At least eight (8) of those complaint intakes generated complaint filings with HUD's Office of Fair Housing & Equal Opportunity as well. Two (2) of the HUD complaints have been settled with \$3,256 in Monetary Recovery through the HUD Conciliation process, the remaining cases are pending at HUD. Most complaint intakes/inquiries from Tulsa were resolved through fair housing and renter's rights counseling. At least four (4) complaints were mediated by MFHC staff with \$1,219 in monetary recovery for Tulsa complaining parties.

SECTION VI. FAIR HOUSING IN THE PRIVATE SECTOR

Lending Analysis

Citywide lending practices were analyzed using data gathered from lending institutions in compliance with the Home Mortgage Disclosure Act (HMDA). The HMDA was enacted by Congress in 1975 and is implemented by the Federal Reserve Board as Regulation C. The intent of the Act is to provide the public with information related to financial institution lending practices and to aid public officials in targeting public capital investments to attract additional private sector investments.

Since enactment of the HMDA in 1975, lending institutions have been required to collect and publicly disclose data regarding applicants including: location of the loan (by Census tract, County, and MSA); income, race and gender of the borrower; the number and dollar amount of each loan; property type; loan type; loan purpose; whether the property is owner-occupied; action taken for each application; and, if the application was denied, the reason(s) for denial. Property types examined include one-to-four family units, manufactured housing and multi-family developments.

HMDA data is a useful tool in accessing lending practices and trends within a jurisdiction. While many financial institutions are required to report loan activities, it is important to note that not all institutions are required to participate. Depository lending institutions – banks, credit unions, and savings associations – must file under HMDA if they hold assets exceeding the coverage threshold set annually by the Federal Reserve Board, have a home or branch office in one or more metropolitan statistical areas (MSA), or originated at least one home purchase or refinancing loan on a one-to-four family dwelling in the preceding calendar year. Such institutions must also file if they meet any one of the following three conditions: status as a federally insured or regulated institution; originator of a mortgage loan that is insured, guaranteed, or supplemented by a federal agency; or originator of a loan intended for sale to Fannie Mae or Freddie Mac. For-profit, non-depository institutions (such as mortgage companies) must file HMDA data if: their value of home purchase or refinancing loans exceeds 10 percent of their total loan originations or equals or exceeds \$25 million; they either maintain a home or branch office in one or more MSAs or in a given year execute five or more home purchase, home refinancing, or home improvement loan applications, originations, or loan purchases for properties located in MSAs; or they hold assets exceeding \$10 million or have executed more than 100 home purchase or refinancing loan originations in the preceding calendar year.

It is recommended that the analysis of HMDA data be tempered by the knowledge that no one characteristic can be considered in isolation, but must be considered in light of other factors. For instance, while it is possible to develop conclusions simply based on race data, it is more accurate when all possible factors are considered, particularly in relation to loan denials and loan pricing. According to the FFIEC, “with few exceptions, controlling for borrower-related factors reduces the differences among racial and ethnic groups.” Borrower-related factors include income, loan amount, lender, and other relevant information included in the HMDA data. Further, the FFIEC cautions that the information in the HMDA data, even when controlled for borrower-related factors and the lender, “is insufficient to account fully for racial or ethnic differences in the incidence of higher-priced lending.” The FFIEC suggests that a more thorough analysis of the differences may require additional details from sources other than HMDA about factors including the specific credit circumstances of each borrower, the specific loan products that they are seeking, and the business practices of the institutions that they approach for credit.

The following analysis is provided for the City of Tulsa, Oklahoma summarizing 2017 HMDA data (the

most recent year for which data are available), and data between 2007 and 2017 where applicable. Due to HMDA data's geographic constraints at the municipal jurisdiction level, the geography utilized includes all Census tracts that fall within the boundaries of the City of Tulsa. Where specific details are included in the HMDA records, a summary is provided below for loan denials including information regarding the purpose of the loan application, race of the applicant and the primary reason for denial. For the purposes of analysis, this report will focus only on the information available and will not make assumptions regarding data that is not available or was not provided as part of the mortgage application or in the HMDA reporting process.

2017 Citywide Overview

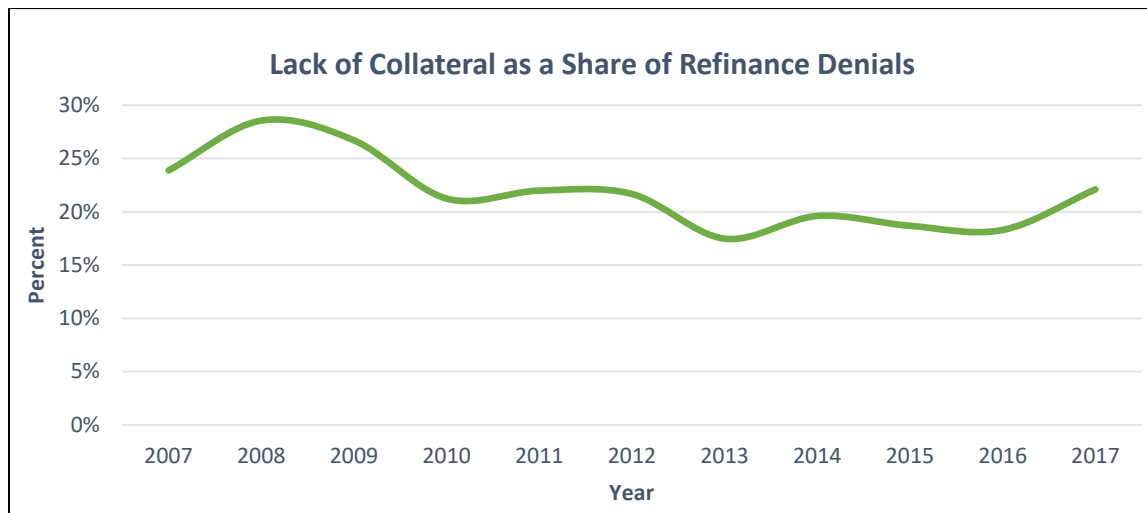
In 2017, there were approximately 24,250 applications within Tulsa for home loans to purchase, refinance or make home improvements for a single family home - not including manufactured homes. Of those applications, over 13,200 or 55 percent were approved and originated. This represents a decrease of approximately 1,500 originations from 2016 and a percentage decrease of approximately 10 percent, consistent with the national decrease of 13 percent. Of the remaining 11,000 applications, approximately 2,900 or 12 percent of all applications were denied. The top two application denial reasons within the City were credit history (24.4 percent) and debt-to-income ratio (23.6 percent), representing nearly half of the City's total denials. Lack of collateral and incomplete applications represented 20 percent and 15 percent of denials respectively. It is important to note that financial institutions are not required to report reasons for loan denials, although many do so voluntarily. Also, while many loan applications are denied for more than one reason, HMDA data reflects only the primary reason for the denial of each loan. The balance of the approximately 8,100 applications, that were not originated or denied, were closed for one reason or another including a) the loan was approved but not accepted by the borrower, b) the application was closed because of incomplete information or inactivity by the borrower or c) the application may have been withdrawn by the applicant.

Table: Disposition of Application by Loan Type and Purpose, 2017
Single Family Homes (excluding manufactured homes)

	Loan Type	Home Purchase	Refinance	Home Improvement
Total Applications				
	Conventional	8,192	5,223	1,885
	FHA	4,662	1,474	91
	VA	1,121	1,018	43
	FSA/RHS	522	20	0
Loans Originated				
	Conventional	5,382	2,702	1043
	FHA	2,329	520	29
	VA	642	362	19
	FSA/RHS	252	3	0
Loans Approved but Not Accepted				
	Conventional	228	160	71
	FHA	76	42	5
	VA	17	31	2
	FSA/RHS	10	0	0
Applications Denied				
	Conventional	460	878	616
	FHA	262	297	23
	VA	69	257	7
	FSA/RHS	26	6	0
Applications Withdrawn				
	Conventional	752	753	97
	FHA	312	231	19
	VA	96	170	8
	FSA/RHS	27	6	0
Files Closed for Incompleteness				
	Conventional	103	327	33
	FHA	40	185	10
	VA	9	109	5
	FSA/RHS	6	2	0
Source: 2017 HMDA				

A further examination of the 2,901 denials within Tulsa during 2017 indicates that approximately 50 percent were for applicants seeking to refinance existing mortgages for owner-occupied, primary residences. The number one reason for denial of refinance applications was lack of collateral (22 percent of refi. denials), followed closely by credit history and debt-to-income ratio (21 percent of refi. denials). Incomplete applications represented 20 percent of all refinance denials. Typically, homeowners, seeking to refinance their existing home mortgage are able to use their home as collateral. When the denial reason given for a refinance is a lack of collateral, this would indicate the home is worth less than the existing mortgage and, therefore, refinancing is not an option – these homes are commonly referred to as “under-water” or the borrowers are “upside-down” in their mortgage. Shown below, the percentage of refinance denials given for the reason of lack of collateral has trended downward since the peak of the housing crisis, though as of 2017 the share was at the highest level since 2012. However, the share

of 22 percent in 2017 suggests that the number of “under-water” homes in Tulsa has declined since the peak of 29 percent in 2008.

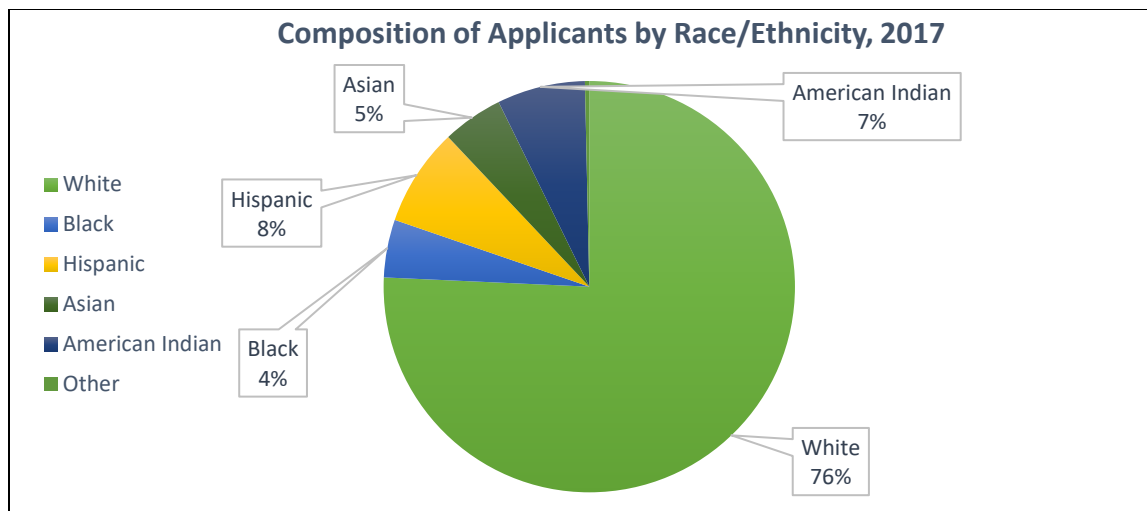


Source: 2017 HMDA

Home Purchase Lending in Tulsa

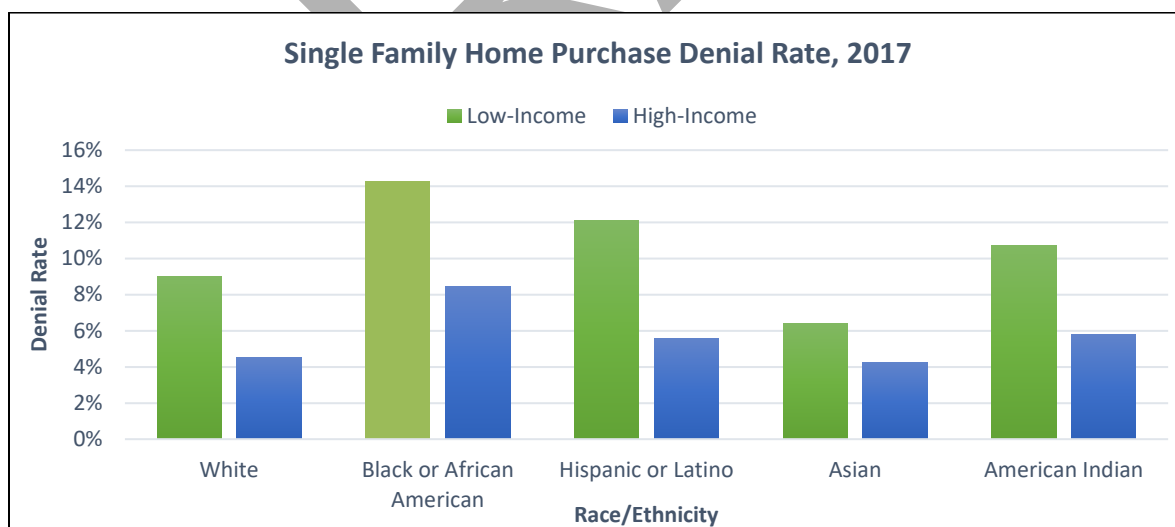
Of the home purchase loans for single family homes that were originated in 2017, (8,605 loans originated) approximately 63 percent of these originations were provided by conventional lenders, consistent with the national conventional home purchase share of 64 percent. The remaining 37 percent of home purchase loans in Tulsa were provided by federally-backed sources including the Federal Housing Administration (FHA), the Department of Veterans Affairs (VA), and the Rural Housing Service (RHS). Nonconventional loans, including the FHA, VA, and RHS lending programs, have relatively lower down-payment requirements in comparison to conventional lenders. The FHA and VA lenders had application/approval ratios of 46 percent and 47 percent respectively, while conventional lenders originated 60 percent of all home purchase applications.

The percentage of loan application denials for traditional home purchase loans for one-to-four family housing in Tulsa varies by race/ethnic groups. The largest applicant group in 2017 were non-Hispanic Whites (76 percent) followed by Hispanics (8 percent) and American Indians (7 percent). Asian applicants represented 5 percent of all home purchase applications while Black applicants represented 4 percent. In 2017, Whites were least likely to be denied for conventional single family home purchases, being denied at a rate of 5.5 percent, with Asians close behind at 5.7 percent. American Indians were denied at 11 percent while Hispanics were denied at a rate of 13 percent. Black applicants faced the highest conventional home purchase denial rate at 14 percent.



Source: 2017 HMDA

Additionally, a closer look at home purchase denial rates by race/ethnicity and income group within Tulsa, shown below, demonstrates that High Income Blacks (having greater than 120 of Area Median Income) were nearly just as likely to be denied for a single family home purchase, at 8 percent, than Low Income Whites (having less than 80 percent of Area Media Income), at 9 percent. Low Income Blacks were the group with the highest home purchase denial rate at 14 percent, more than 3 times the rate of High Income Whites and High Income Asians. Asian applicants demonstrated the lowest disparity in denial rates between low- and high-income applicants, at 2 percent, while the gap between low- and high-income applicants for Hispanics was approximately 7 percent, more than any other group.

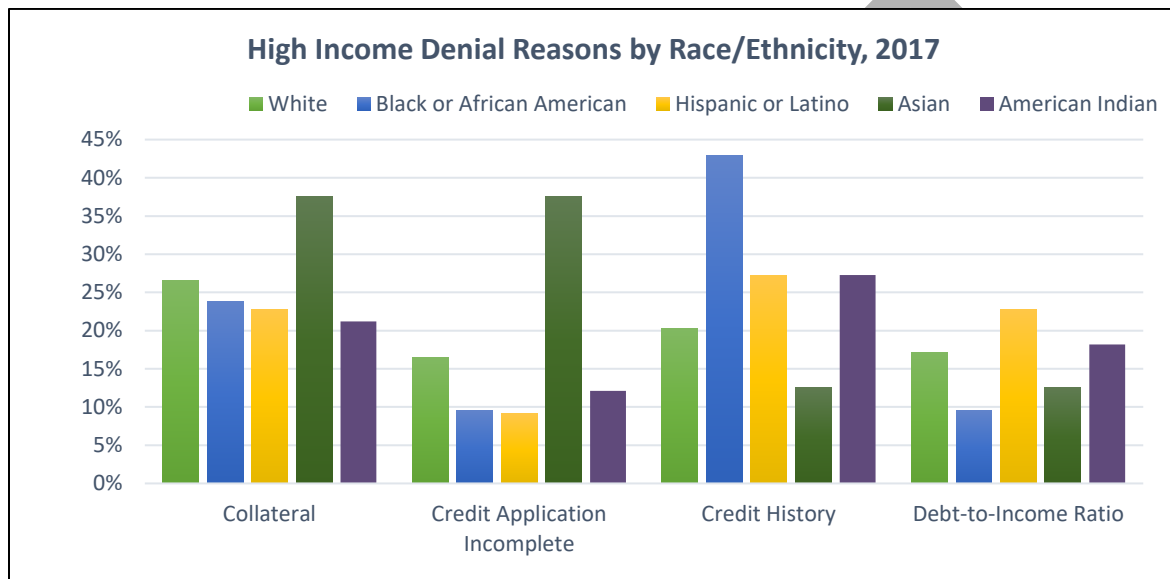


Source: 2017 HMDA

Application Denial Reasons by Income Group

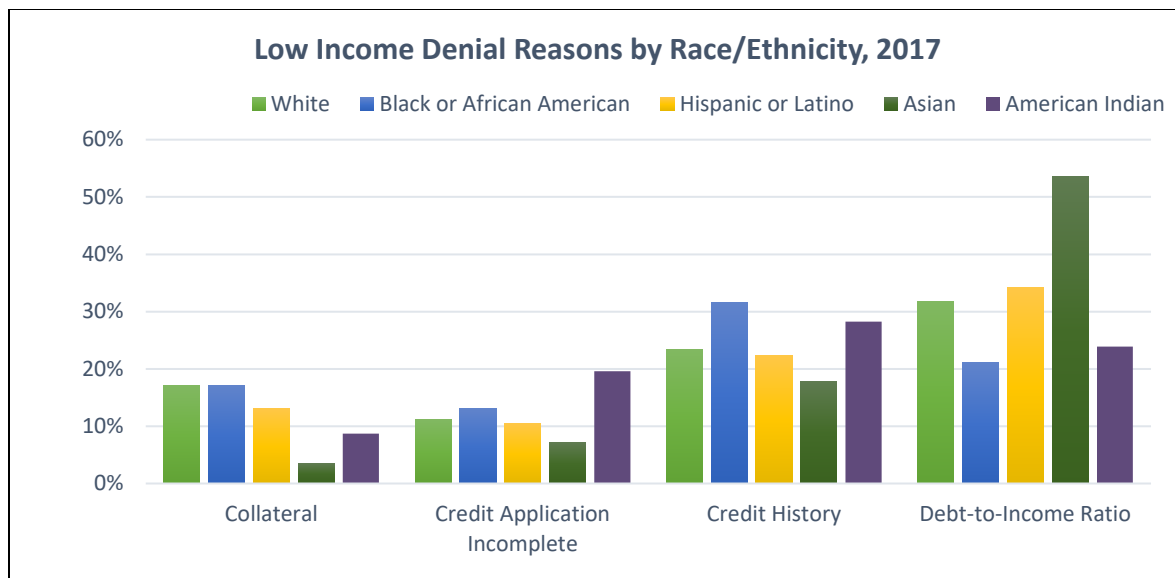
The below charts compare denial reasons among White, Black, Hispanic, and Asian applicants in Tulsa for 2017 by income group.

As of 2017, the leading denial reason for High Income Whites was lack of collateral, representing over a quarter of all denials for High Income. High Income Black, Hispanic, and American Indian applicants, by contrast, were most likely to be denied for credit history, at over 40 percent in the case of High Income Blacks.



Source: 2017 HMDA

For Low Income denials, debt-to-income ratio was the top reason for all groups except Black applicants, where credit history was the top reason in 2017, at 32 percent. All Low Income groups were denied for debt-to-income ratio at a higher rate than their High Income counterparts, and less likely to be denied for lack of collateral.

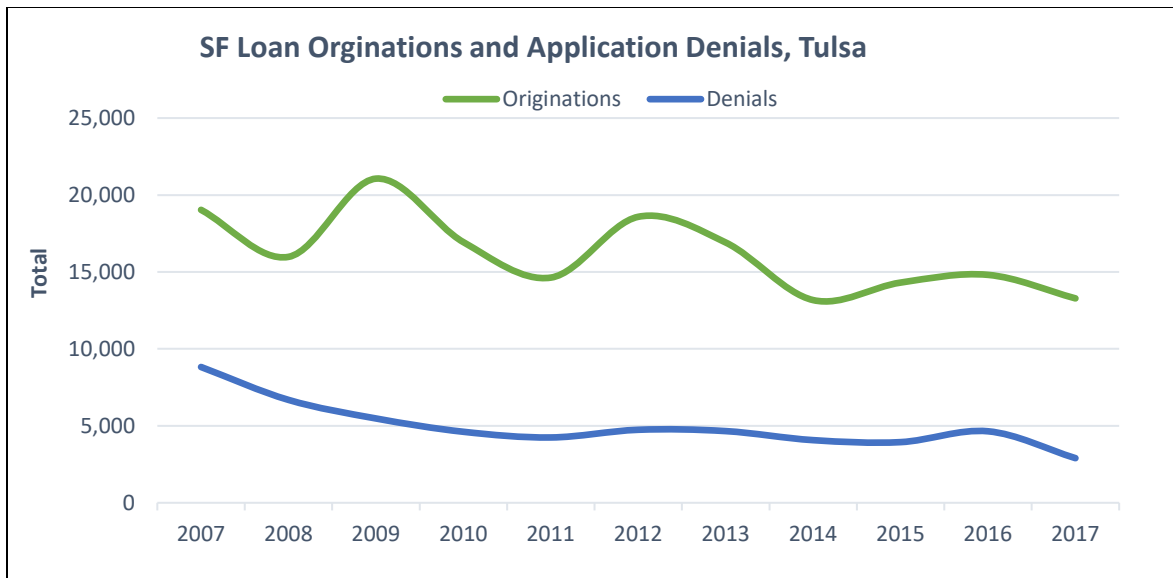


Source: 2017 HMDA

Tulsa's Single Family Lending Market, 2007-2017

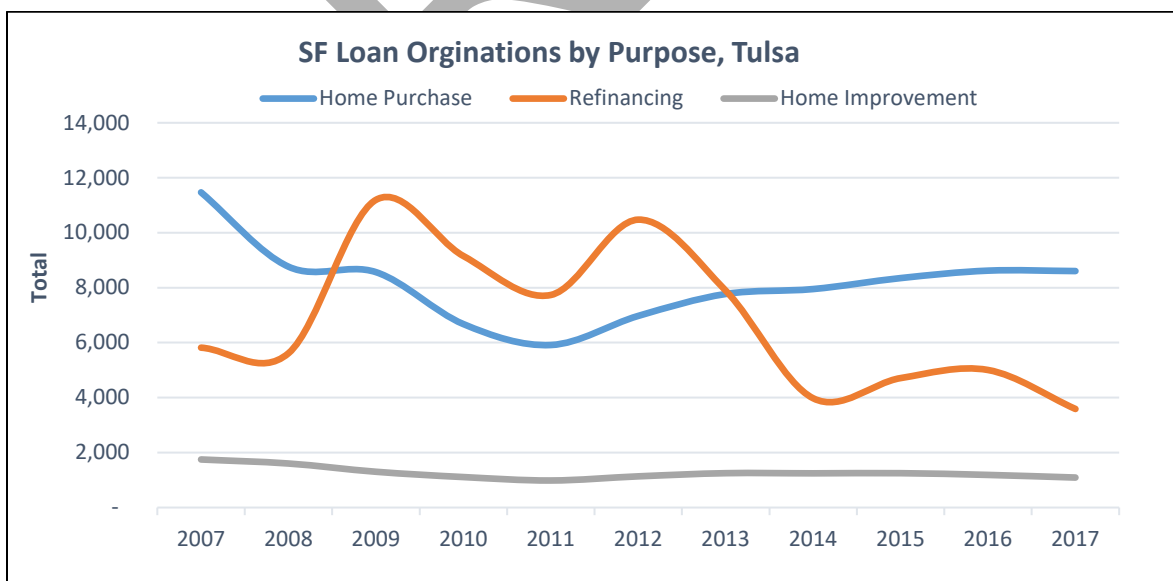
The following section will examine HMDA data over the time period 2007-2017, for the City of Tulsa.

Highlighted below, the number of single family loan originations in Tulsa followed a dynamic trajectory between 2007 and 2017, though has broadly trended downward. At the onset of the housing crisis, originations declined 16 percent between 2007 and 2008, followed by a steady downward trend between 2009 and 2011. However, total originations increased by 27 percent between 2011 and 2012. Loan originations then fell by 27 percent between 2012 and 2014, though grew steadily between 2014 and 2016 (12 percent), followed by a 10 percent decrease between 2016 and 2017. As of 2017, total originations in Tulsa are at about 70 percent of the level prior to the housing crisis. In contrast to originations, the number of application denials within Tulsa demonstrated less extreme changes between 2007 and 2017. As of the most recent data year, denials are 67 percent below the level experienced in 2007. Relatedly, the share of denials as a percent of total originations and total denials has declined markedly since the housing bust, from 32 percent in 2007 to approximately 18 percent as of 2017.



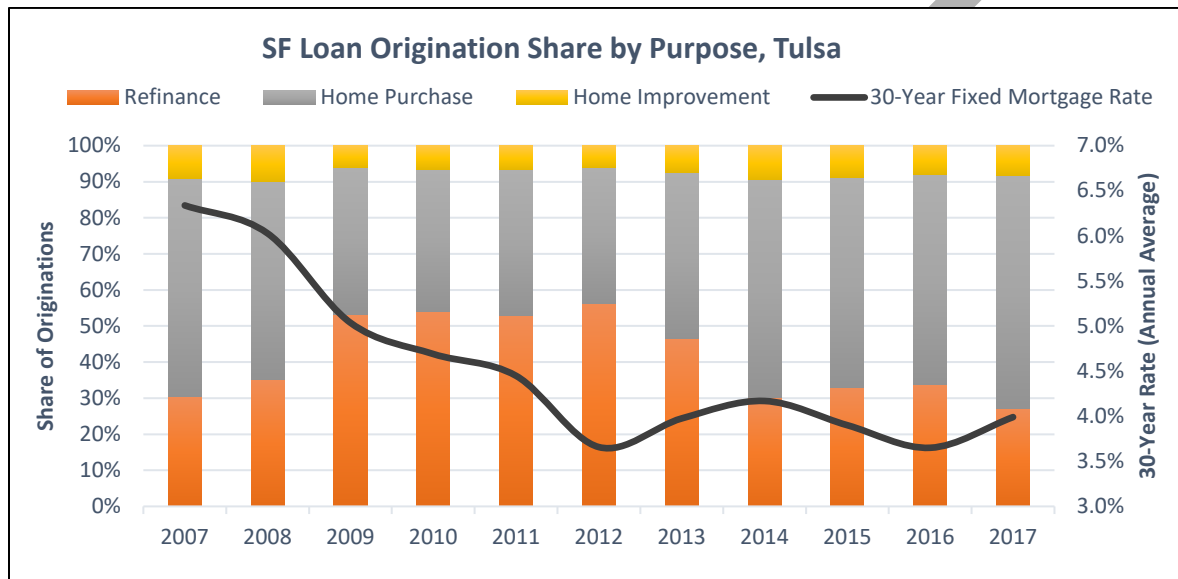
Source: 2017 HMDA

Shown below, much of the year-to-year fluctuations in total originations that occurred between 2007 and 2017 were the result of refinancing originations. Home purchases represented the top loan purpose by total originations in 2007 by a significant margin, though refinancing became the dominant loan purpose between 2009 and 2013, as interest rates were broadly falling, discussed further below. In 2017, home purchases comprised 65 percent of the City's total originations, and the upward trend of home purchase originations since 2011 (46 percent growth rate between 2011 and 2017), likely reflects a steady and recovering demand for housing within the City.



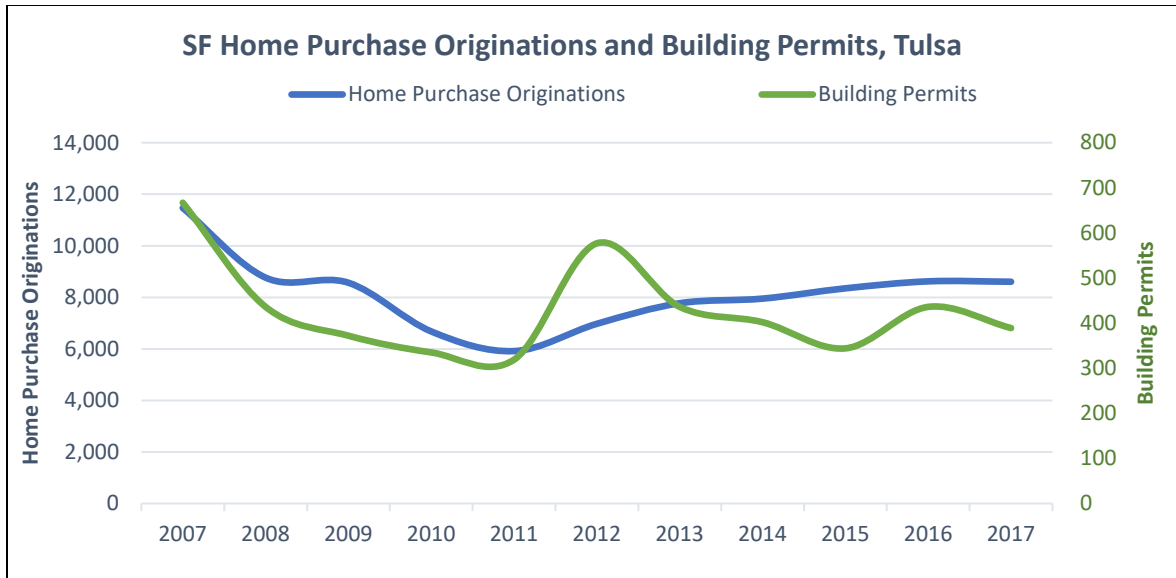
Source: 2017 HMDA

The share of refinance originations in Tulsa appears to move generally with the 30-year fixed rate mortgage average, shown below. In 2012, for example, when the average 30-year fixed rate mortgage was at its lowest level of all the years examined, refinance originations reached the highest level in percentage terms of all data years analyzed, and highest level in absolute number with the exception of 2009, the peak of the housing crisis. Similarly, when interest rates rose between 2012 and 2014, the share of refinance originations fell from 56 percent to 30 percent. The increase in the annual average of the 30-year fixed mortgage rate between 2016 and 2017 is consistent with Tulsa's 28 percent reduction in the number of refinance loan originations over the same time period.



Source: HMDA, Federal Reserve Bank of St. Louis

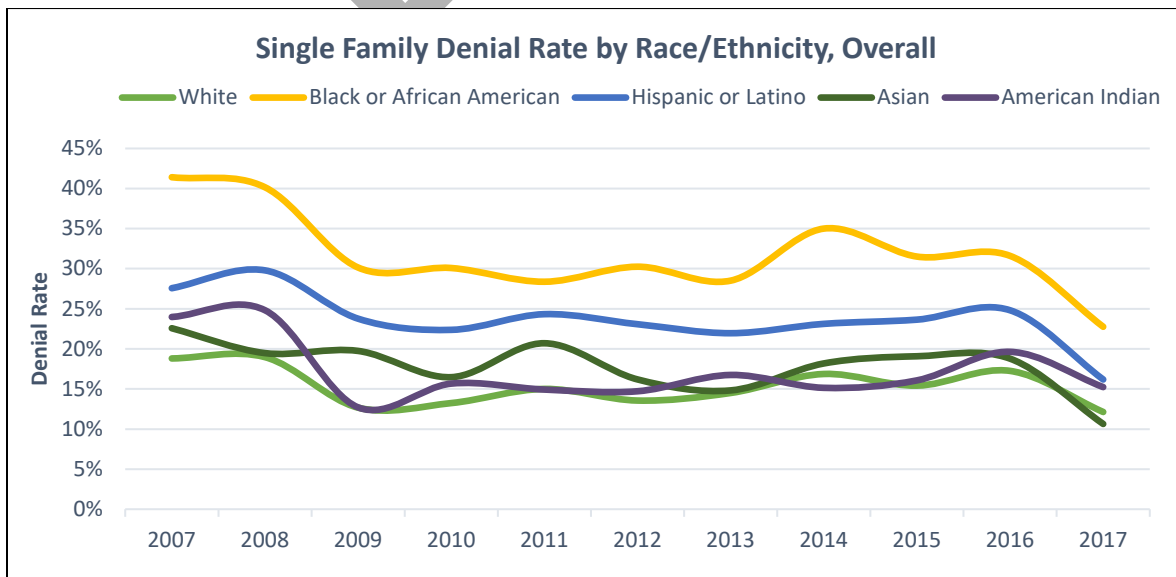
For home purchase loans, the movement of originations often tracks trends in the number of single family building permits issued. However, despite increases in home purchase loans since 2011, residential building permits have broadly trended downward.



Source: 2017 HMDA

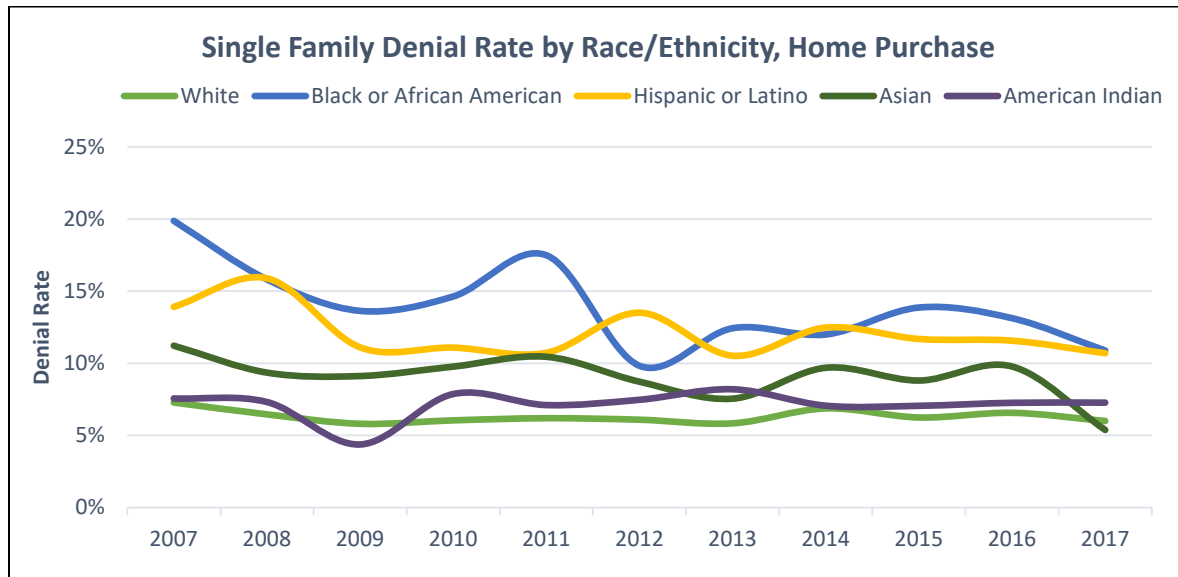
Income, Race, and Single Family Loan Denials in Tulsa

Denial rates for single family loans in Tulsa over time vary by race and ethnicity. The charts below show that between 2007 and 2017, White, Asian, and American Indian applicants were generally less likely to be denied relative to Black and Hispanic applicants. The overall denial rate for all groups has fallen during the analysis period, with Black applicants experiencing the greatest percentage point decrease from 41 percent to 22.3 percent. though the overall disparity between White and Black applicants remains, with Black applicants nearly twice as likely to be denied than White applicants as of 2017.



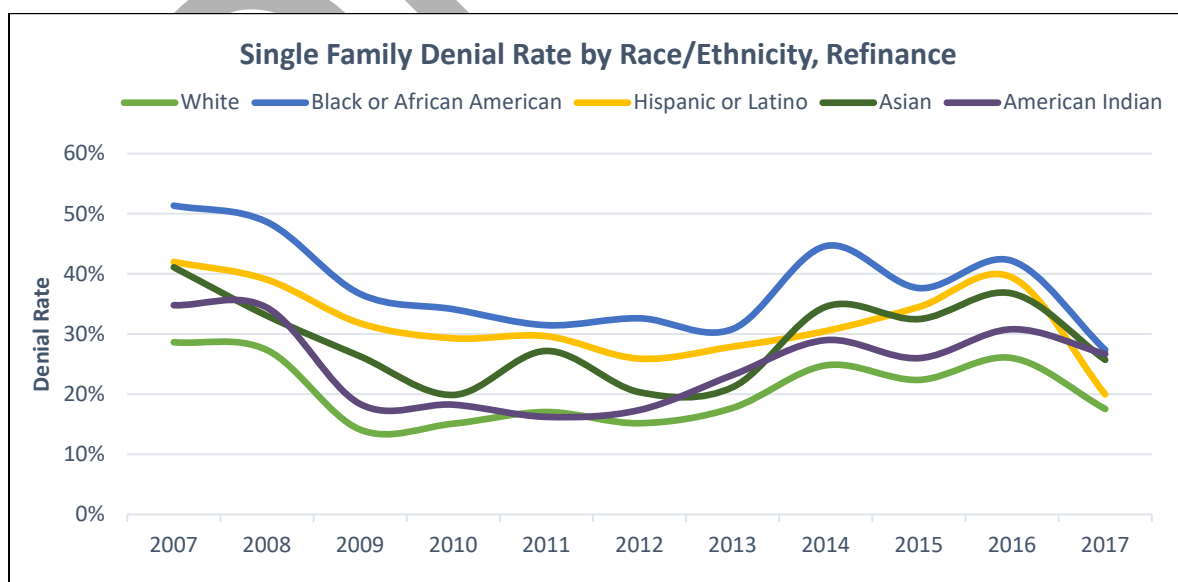
Source: 2017 HMDA

Home purchase applications exhibit lower denial rates for all applicant groups relative to overall denial rates. However, relative to other loan purposes, home purchase denial rates exhibit more variability among race/ethnicity groups, though Whites were the least likely to be denied in all but one of the years examined. As of the most recent data year, Black and Hispanic applicants experienced the highest home purchase denial rates at 11 percent.



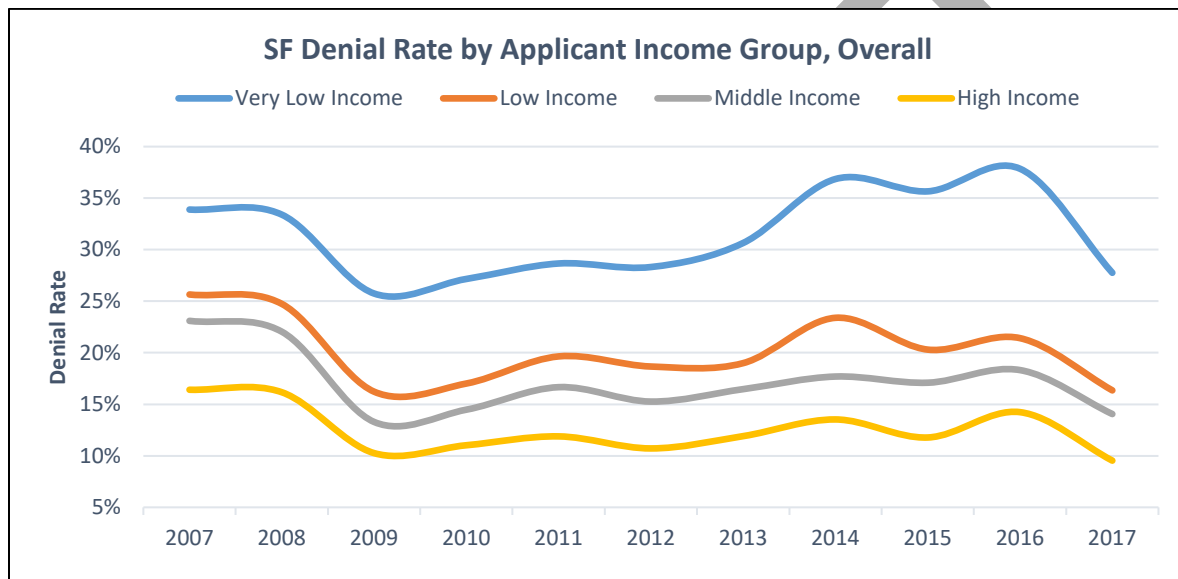
Source: 2017 HMDA

Similar to the overall denial rate, Hispanics and Blacks were the groups with the highest denial rates for a refinance application in all study years.



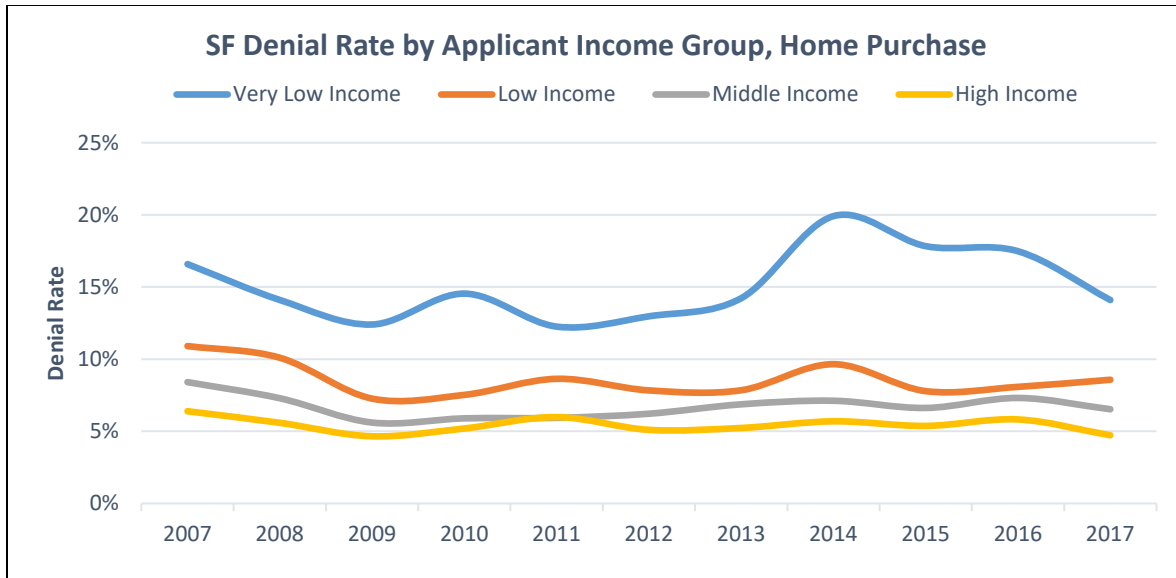
Source: 2017 HMDA

A view of single family denial rates by applicant income group within Tulsa, highlighted below, shows the expected outcome of higher income groups experiencing lower denial rates than lower income groups. However, Very Low Income applicants (50 percent or less of Area Median Income) have remained well above other income groups, with generally increasing divergence since 2009, despite a decrease from 38 percent to 28 percent between 2016 and 2017. High Income (greater than 120 percent of Area Median Income) applicants were consistently the lowest denied group respectively, with Middle Income (80 to 120 percent of Area Median Income) and Low Income (between 50 percent and 80 percent of Area Median Income) applicants between the other two groups during every year examined. The single family denial rate declined for all income groups between 2007 and 2017.



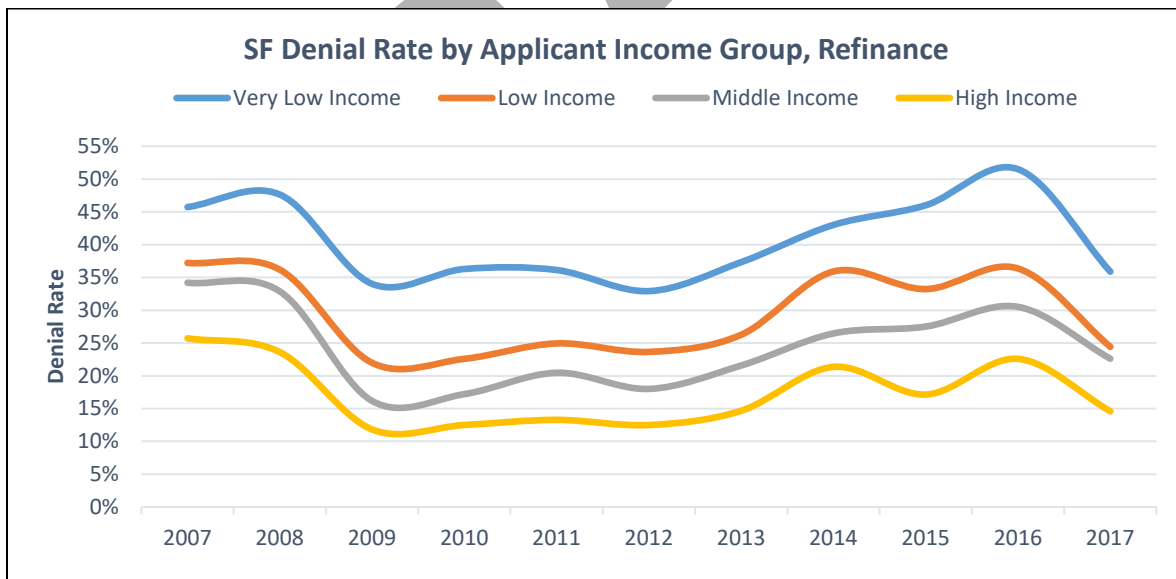
Source: 2017 HMDA

Similar to overall denial rates by income group, home purchase applications were denied at a much higher rate for Very Low Income applicants during most years between 2007 and 2017 while Low, Middle, and High Income applicants have remained closer to each other. As of the most recent data year, Very Low Applicants are more than twice as likely to be denied for a home purchase relative to Middle Income applicants.



Source: 2017 HMDA

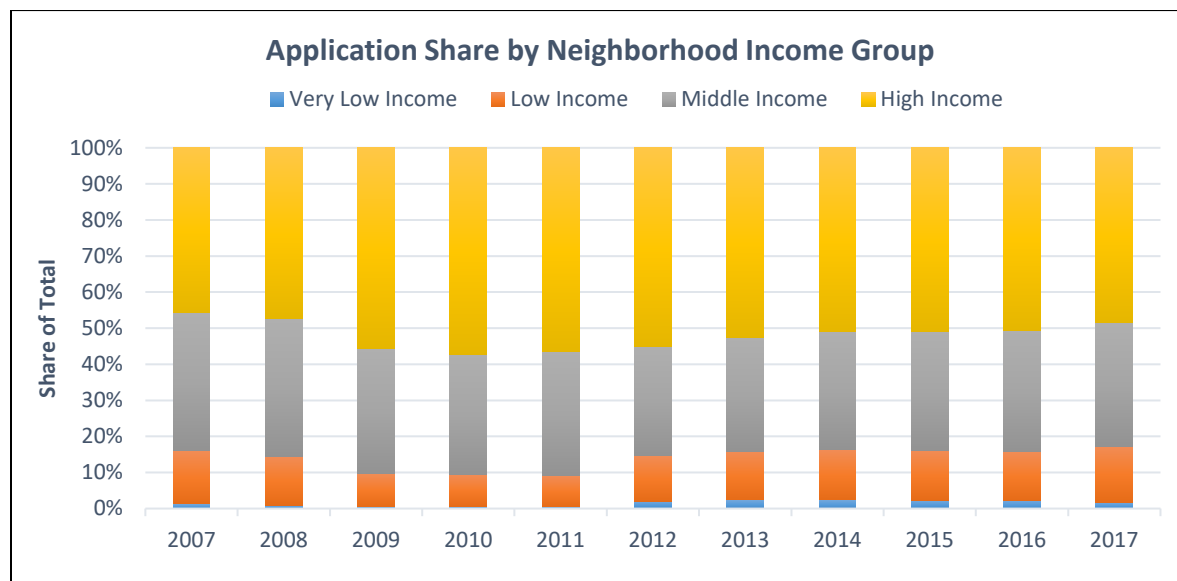
Denial rates for refinance applications demonstrate that in every year examined, High Income applicants had the lowest refinance denial rate while Very Low Income applicants had the highest. Between 2016 and 2017, the refinance denial rate for all income groups declined.



Source: 2017 HMDA

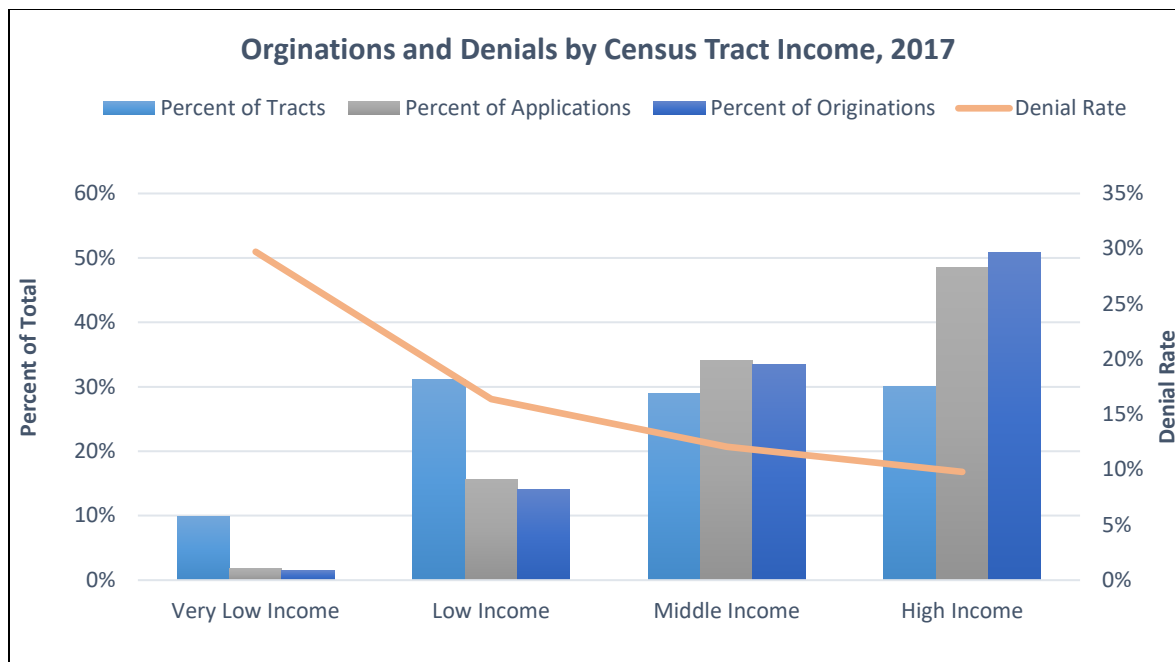
As a percentage of total applications within Tulsa, the distribution among neighborhoods by income group (defined as median income of property's Census tract) shows that for every year examined, High Income

neighborhoods had the highest percentage, and represented the majority of applicants for every year between 2009 and 2016.



Source: 2017 HMDA

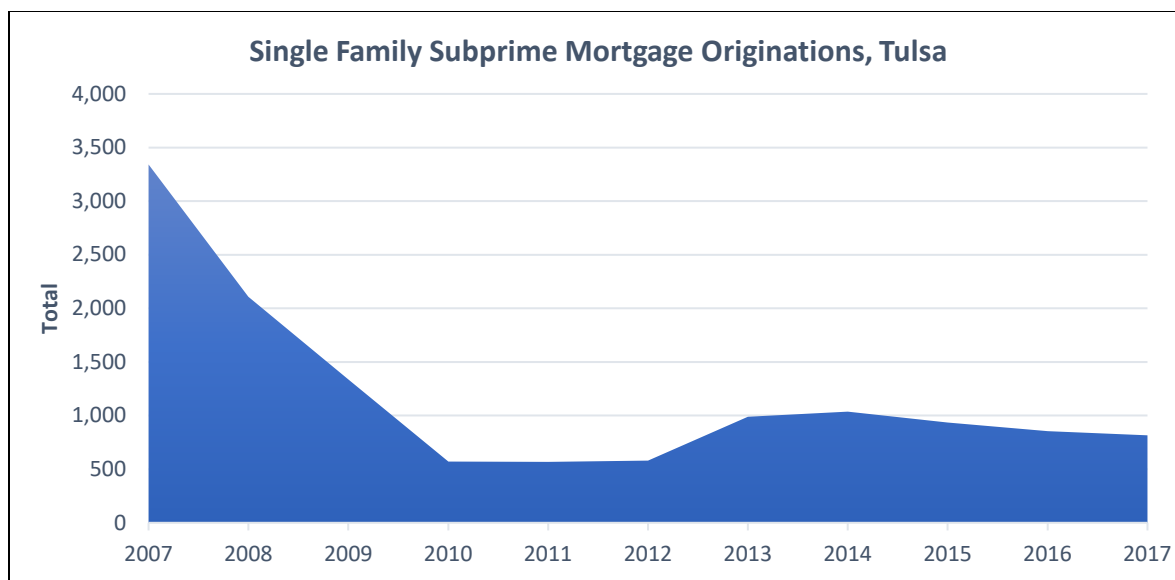
Within Tulsa, Very Low Income and Low Income neighborhoods represent 41 percent of the City's total neighborhoods, although they are represented by approximately 16 percent of total originations and 17 percent of total applications as of 2017, shown below. This suggests that Low and Very Low Income neighborhoods within the City are less likely to participate in the single family lending market relative to other neighborhoods. By contrast, loan applications and originations within Tulsa are disproportionately likely to occur for properties in Middle and especially High Income neighborhoods. For example, High Income neighborhoods represent 30 percent of the City total, though they accounted for 49 percent of applications and 51 percent of all single family loans originations throughout the City in 2017.



Source: 2017 HMDA

The Subprime Market

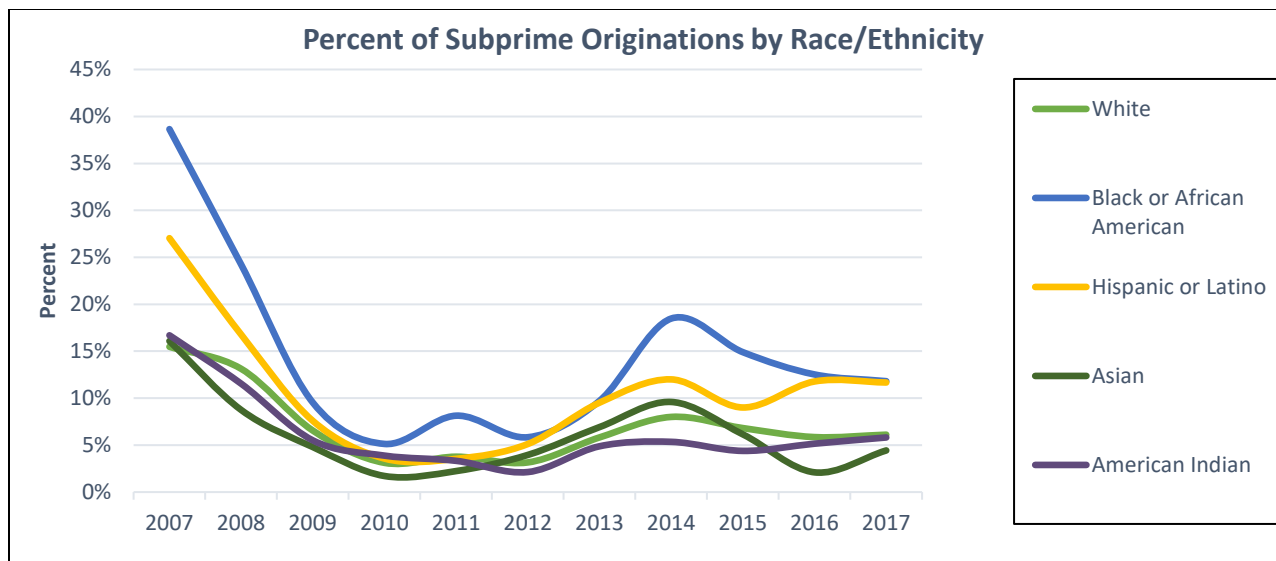
Illustrated below, the subprime mortgage market in Tulsa declined significantly between 2007 and 2010, dropping by 83 percent. However, subprime originations nearly doubled between 2012 and 2013, before stabilizing to about 850 per year (approximately a quarter of the 2007 total). Subprime loans are defined as those with an annual percentage rate that exceeds the average prime offer rate by at least 1.5 percent. The total number of subprime loan originations decreased by approximately 76 percent on net between 2007 and 2017, while prime originations decreased by 21 percent during the same time period. As a percent of Tulsa's total, subprime originations declined from 18 percent to 6 percent between 2007 and 2017.



Source: 2017 HMDA

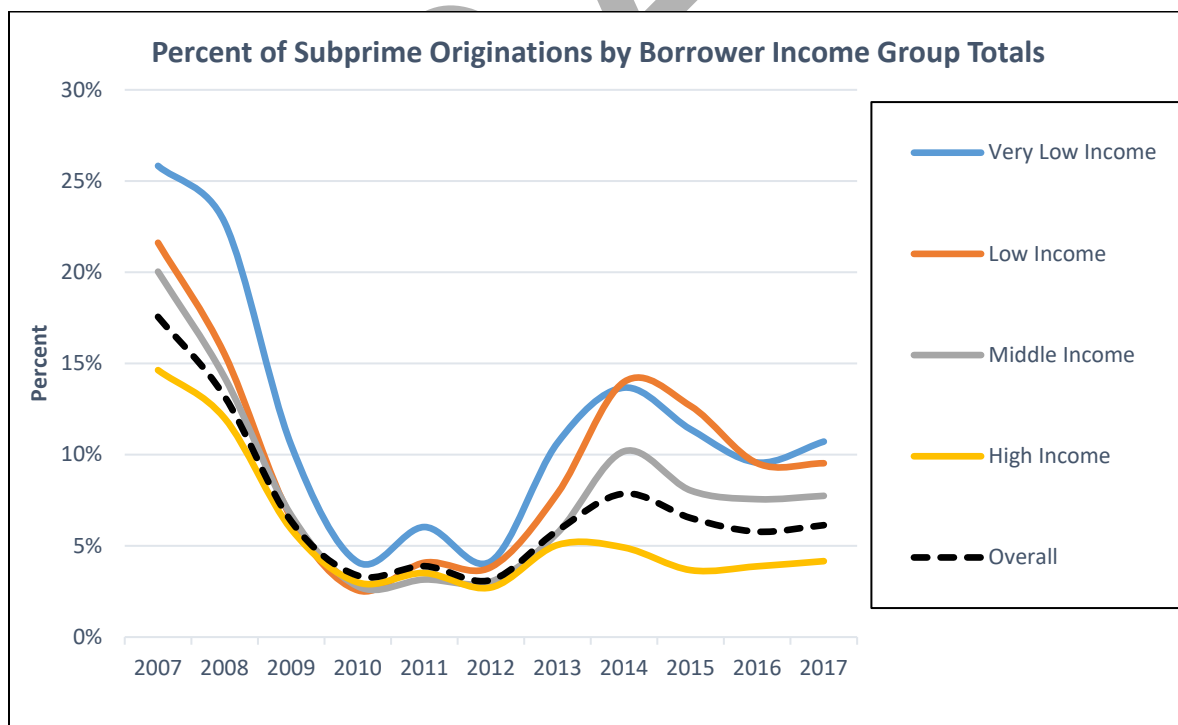
Looking at the share of subprime loans as a percentage of total originations by race/ethnicity reveals that Black loan recipients were the most likely to be subprime at 39 percent in 2007 while Hispanic loan recipients were the second most likely at 27 percent. This trend is consistent with the broader national pattern of minorities being disproportionately subjected to predatory subprime lending leading up to the housing crash, as outlined in a post-crisis report by the US Department of Housing and Urban Development.¹ The period between 2007 and 2010 saw the subprime share for Black and Hispanic borrowers decline substantially, partly the result of tighter credit conditions and financial regulations in the aftermath of the housing crisis. Relative to the pre-crisis share of subprime originations, all groups are down relative to the 2007 share. Blacks and Hispanics are twice as likely to receive a subprime loan, at 12 percent, than Whites, at 6 percent, as of 2017.

¹ https://www.huduser.gov/portal/publications/foreclosure_09.pdf



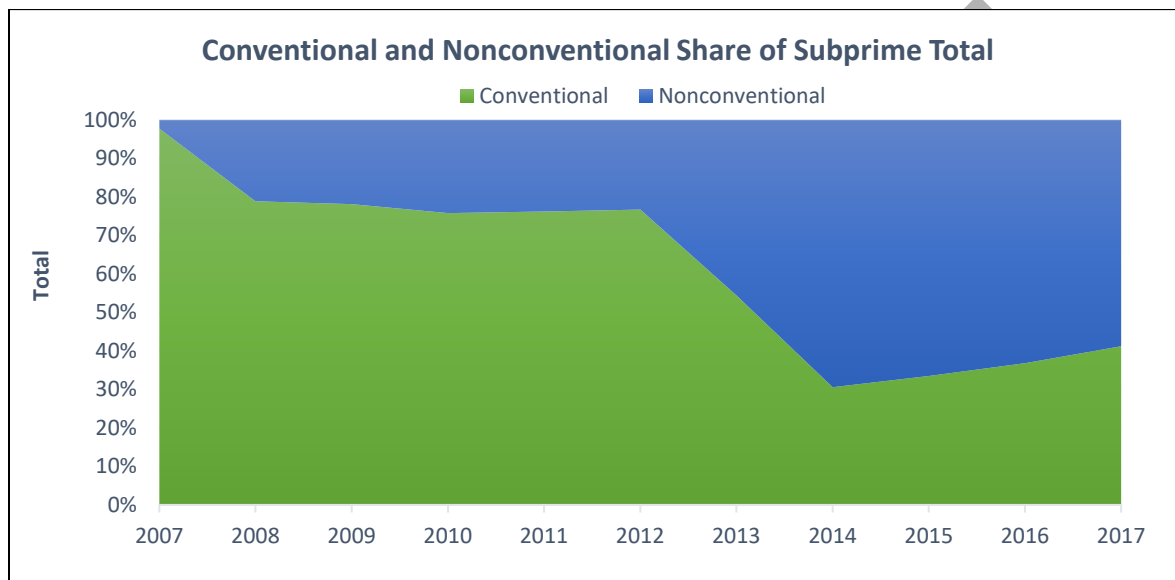
Source: 2017 HMDA

A view of subprime originations by income group totals shows a sharp decline between 2007 and 2010 among all groups, with overall increases from 2012 to 2014, led in particular by the Low and Very Low Income groups.



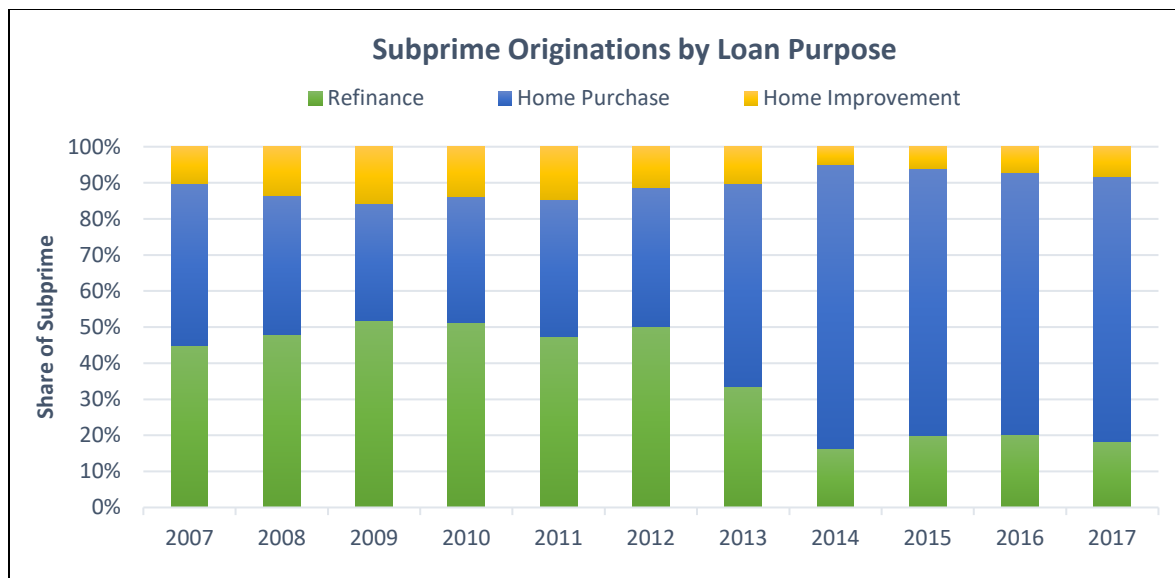
Source: 2017 HMDA

Consistent with broader national trends, the composition of subprime loans within Tulsa has shifted from conventional loans to government-insured nonconventional loans since the housing crisis. In 2007, 98 percent of subprime loans within the City were originated by conventional lenders. As of 2017, that percentage is 41 percent, up from a low of 31 percent in 2014. Nearly all (99 percent) of nonconventional subprime loans originated in Tulsa were insured by the Federal Housing Administration in 2017. By contrast, the FHA's share of nonconventional prime loans is 65 percent, with 28 percent insured by the Department of Veterans Affairs and 7 percent insured by the Rural Housing Service.



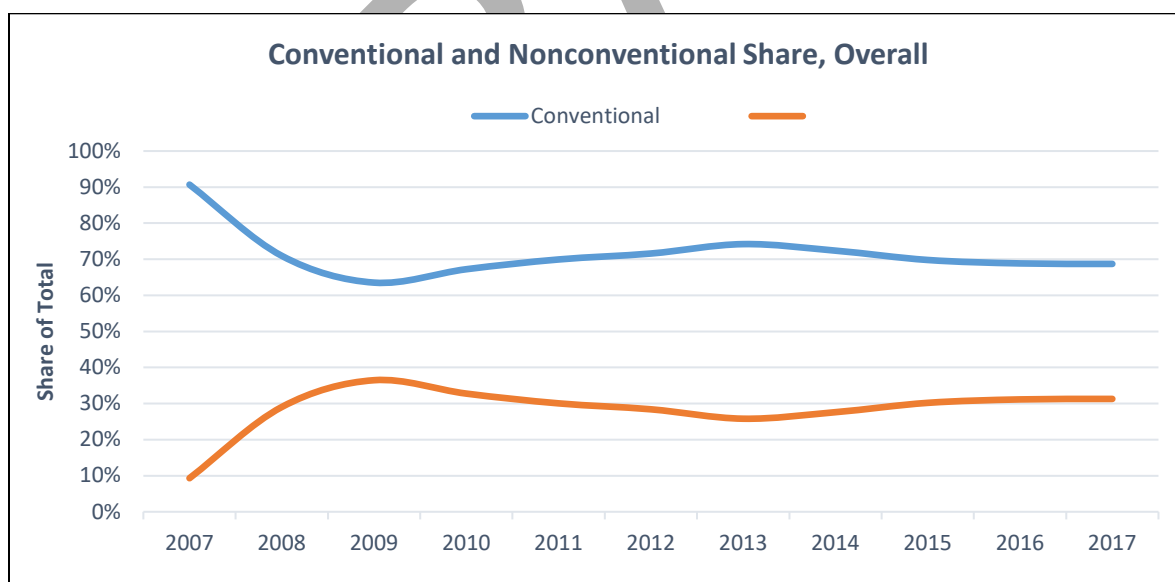
Source: 2017 HMDA

As a percentage of all subprime loan originations within Tulsa, home purchases represented 74 percent in 2017, up from its share of 45 percent in 2007 and a low of 33 percent in 2009.

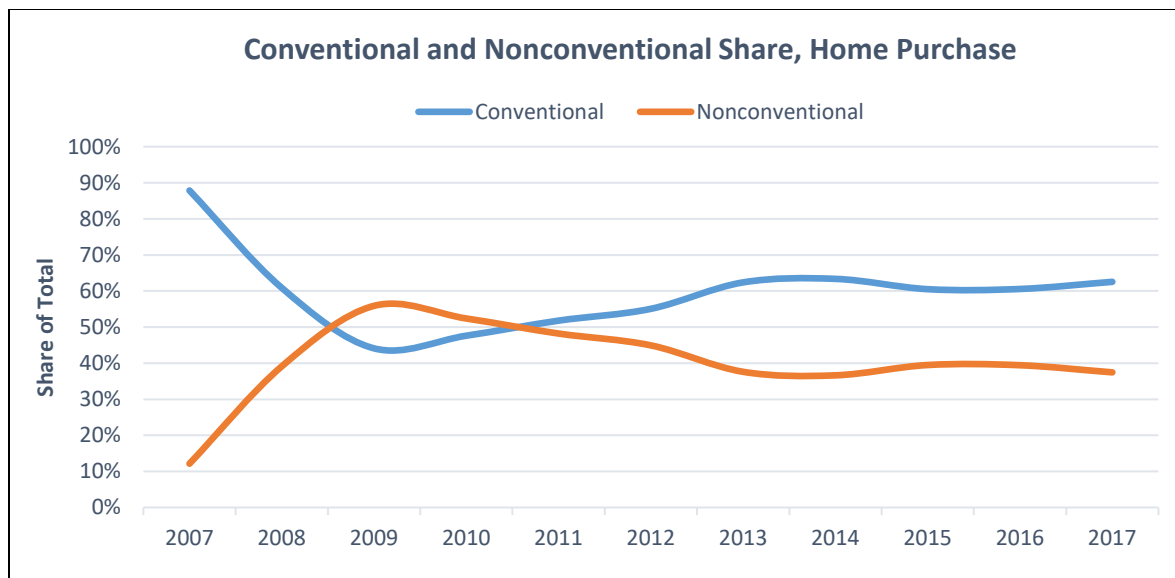


Source: 2017 HMDA

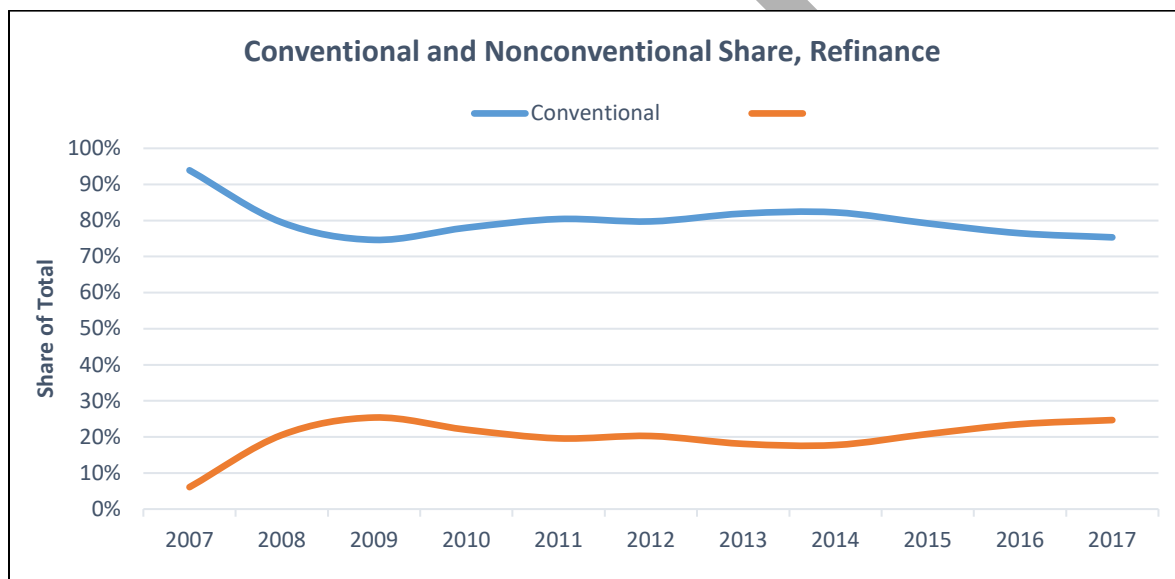
Though half of all subprime loans within Tulsa are nonconventional, 69 percent of all single family originations in 2017 were from conventional lenders. The highest share of nonconventional originations for any loan purpose was for home purchase loans in 2009 at 56 percent. The share of conventional lending in Tulsa has stabilized around 70 percent since 2015.



Source: 2017 HMDA



Source: 2017 HMDA



Source: 2017 HMDA

Conclusion

Mortgage lending activity in Tulsa is consistent with many of the broader trends that have occurred in the wake of the housing crash, Great Recession, and subsequent economic recovery.

While home purchase originations remain below the levels seen prior to the housing crisis, they have grown 45 percent since 2011, suggesting signs of growing housing demand and a housing market recovery within the City.

The City has also been subject to cyclical trends that reflect broader economic conditions in recent years, including changes in mortgage rates that influence the prevalence of refinance originations and a subprime lending market that remains well below its peak prior to the housing bust. Government-insured mortgages have increased in the subprime market, consistent with tighter credit conditions and a more active regulatory environment in the wake of the housing crash.

Some trends, however, have continued despite business cycle fluctuations, such as higher denial rates for Black and Hispanic applicants relative to White applicants, in addition to higher denial rates for lower income applicants and neighborhoods.

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SECTION VII. FAIR HOUSING IN THE PUBLIC SECTOR

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

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

Multi-Family Housing Units

Public or assisted housing can exist in several forms, including low-income housing projects, housing voucher programs, and supportive housing. The objective of public and other forms of assisted housing is to provide housing that is suitable for persons with special needs or families of low- to moderate-income levels and to promote access to jobs, transportation, and related community resources. Uneven distribution of public and assisted housing can be the result of an impediment such as land use policies that discourage multi-family or low-income housing in some areas, thus leading to segregation of low-income and other populations. The Low-Income Housing Tax Credit (LIHTC) Program is designed to promote investment in affordable rental housing by providing tax credits to developers of qualified projects. To qualify for the tax credits, housing projects must be residential rental properties in which a proportion of available units are rent-restricted and reserved for low-income families. The exact proportions of units that need to be reserved for low-income families for a project to qualify for LIHTC credits varies according to which threshold the property owner elects to implement: at least 20 percent of housing units must be occupied by families with incomes equal to or less than the area median income (as determined by HUD) according to the 20-50 rule, while at least 40 percent of units must be reserved for families earning less than 60 percent of the area median income if the property owner elects to follow the 40-60 rule. Area median incomes are adjusted for household size. Property owners are required to maintain rent and income restrictions for at least thirty years, pursuant to the HUD-mandated minimum affordability period, though in some areas they are required to operate under these restrictions for longer time periods. Housing assistance is also available to low-income families through the Section 8 Program. Rent subsidies that are available through Section 8 include Housing Choice Vouchers and Project Based Section 8 housing. Unlike Project-Based Section 8 assistance, which subsidizes specific properties, vouchers are portable: recipients can choose where to live as long as the landlord accepts the vouchers and the unit meets a certain set of HUD-defined criteria, including maximum income limits and the “reasonableness” of the monthly rent charges as compared to units in the private market. The program covers monthly rental costs minus the tenant’s contribution, which is not to exceed thirty percent of his or her monthly adjusted income, or ten percent of monthly unadjusted gross income.

Public Assisted Units, Transit, and Employment Opportunities

Several years ago, the City of Tulsa recognized the need to provide a more frequent reliable transportation option for local residents and began examining how a Bus Rapid Transit system (BRT)

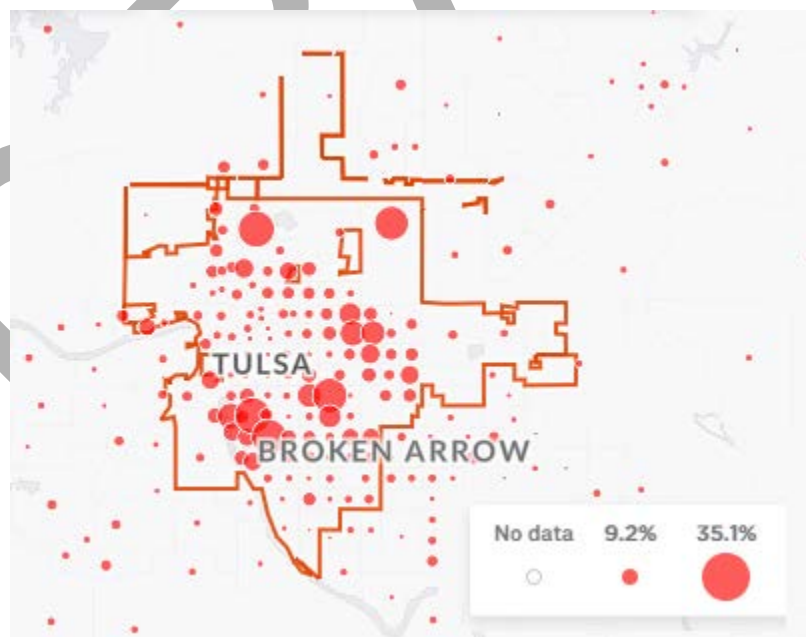
could be adopted in Tulsa. BRT is designed to provide enhanced bus service in key corridors by reducing travel times and providing a high level of passenger amenities. The BRT system in Tulsa, branded as AERO BRT, will operate 7 days a week every 15 minutes weekdays and 20-30 minutes on weekends. The BRT system will run north and south along Peoria Avenue from 54th Street North to 81st Street South. This high-capacity transit line will connect people to jobs and other major destinations. One in seven of the city's residents and 20% of jobs are within a 10-minute walk of the corridor. The city is spending approximately \$20 million in Improve Our Tulsa and Vision Tulsa funds to pay for the buses, bus stations and other capital needs.

Another such line running east and west from downtown along 11th Street corridor out to 145th East Ave is slated to be added and funding for it is included in the next round of Improve Our Tulsa II projects.

Eviction Processes

The City of Tulsa has one of the worst eviction rates in the United States. According to research by Princeton University, the City of Tulsa has the 11th highest eviction rate in the country with 7.7%, which is over three times the national eviction rate of 2.34%. That means annually nearly 8 out of every 100 renter households is evicted, or over 17 households daily. In 2016 there were 6,279 households evicted from rental units. Since 2005 the eviction rate has remained close to 8% for the City.

As is often the case, the citywide rate only tells part of the story. Certain areas of the City had significantly higher eviction rates than others. In general, the southern part of the city has the highest eviction rates but there are two tracts in the north with disproportionately high eviction rates. Tract 80.01 has the highest rate in the City with 26.26% and tract 59 also has a high rate at 24.31. Overall there are five tracts where approximately 25% of all renters will be evicted each year.



Eviction is destabilizing for communities and families. It is both a cause and a symptom of poverty. Speaking with stakeholders, a primary cause of the eviction rates in Tulsa are believed to be the landlord-friendly eviction process and ease with which tenants can be evicted from their homes.

Legal Aid Services of Oklahoma, Inc, (LASO) has commented that civil judgments can have the same impact on protected classes as criminal judgments. LASO indicated that it is more likely than not that minorities, families with minor children, females, persons with disabilities are the usual victims of evictions. Many of the individuals that LASO defends against unwarranted evictions fall within the referenced protected classes. LASO attorneys appear at each client's eviction docket to assist tenants with preventing unfair evictions. LASO also investigates each case for discrimination and offers the additional service of fair housing enforcement to aggrieved parties. While LASO provides education to Tulsa residents about expunging criminal records, it has opined that additional education needs to occur so that Tulsa residents will know how to remove the barriers that old civil records create and also to avoid evictions.

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SECTION VIII. PUBLIC INVOLVEMENT

Fair Housing Survey

The City of Tulsa conducted two sets of online surveys that were available to residents and other community stakeholders in both English and in Spanish. In addition to the surveys being available online (using computers, smart phones, and other handheld devices), the surveys were also made available to residents in a paper-based version. Access to the survey was provided through the City of Tulsa website, through stakeholder email lists, posted in public convening locations, and published in print with QR Codes made available for residents to scan and link to the survey. Background on the Analysis of Impediments process and definitions of fair housing were provided in the survey introduction. The importance of community participation was also highlighted in the survey introduction.

The first survey was meant to get a sense of community positions on fair housing and more general housing and economic development issues. It was comprised of 33 questions covering a range of data points including demographic information, residential information, knowledge of fair housing rights, experiences with fair housing discrimination, opinions on access to information on fair housing, and questions related to housing and community development more generally. It was split into two subsections; one for citizens and the other for organizations. The second survey was much more focused with 10 questions and was meant to prioritize needs.

For the first survey there were 86 responses overall, with 50 citizen responses and 36 organizations responding. The average response time was 12 minutes and the completion rate was 100%. For the second survey, the average response time was 5 minutes, and there were 298 responses. There were no responses for either of the surveys in Spanish. The non-existent Spanish participation rate points to an area of improvement in community engagement for future processes. The City has provided all materials in multiple languages and connected to community organizations that cater to the Latino community for assistance with outreach, but the effort did not result in participation. The survey was open for 3 months with multiple opportunities and reminders for stakeholders and residents to participate.

Citizen Respondent Profile

The respondents to the citizen survey were mostly white (71%) women (81%). The age range was fairly evenly distributed with 28% of respondents being between 25-34, 26% being 35-44, and 32% being between 45 and 64. They were mostly long-time residents of the City of Tulsa, with 74% of them having lived in the City for more than 10 years. The respondents were distributed throughout the City. Only 8% of people responding to the survey identified as Hispanic/Latino. African Americans made up 14% of respondents, there were no Asian respondents, 10% responded they were more than one race, and 4% were Native American. English was the most common language spoken at home at 98%, none said Spanish, and 2% of respondents said that they speak a language other than Spanish or English. 19% of those that responded said they have a disability or disabling condition.

In terms of earnings data, 46% of respondents said they earned \$75,000 per year or above, 46% earned between \$30,000-\$74,999, and 18% earned below \$30,000. Of note is that two-thirds of the 18% that earned below \$30,000 stated they earned less than \$20,000 per year. Forty percent (32%) of respondents live with 3-5 other people. In addition, of the total respondents, 44% said they spend over 30% of their income on housing (including insurance and utilities), and of those, 16% said they spent more than 50%.

Most of the respondents (66%) own their home, and most of those (46%) with a mortgage. Thirty-two percent (32%) are renters.

When asked what the most common issues they had faced in the last two years was related to their housing and neighborhoods, the most common response at 60% was houses were in poor condition in their neighborhoods. Forty-three percent (43%) said that their neighborhoods had abandoned homes or homes in disrepair. Forty-one percent (41%) cited vandalism as a problem, and 38% were dissatisfied with the local services including trash pickup and street maintenance. Thirty-one percent (31%) said that they experienced problems with the maintenance of their plumbing, electrical, appliances and other items in their homes.

The main barriers to good housing options in Tulsa that were cited included concentration of affordable housing only in certain areas of the City, cost of housing, transportation, and access to public transportation.

Organizational Respondent Profile

The majority of the respondents to the organizational survey were non-profits at 92%. The organizations are well-established in Tulsa, with 86% of them being over 10 years in service. The services they provide were fairly evenly distributed among housing (22%), economic development (19%), and other services including legal services at 27%. Their main constituents are disabled (69%), low-income persons earning less than \$20,000 per year (57%). Sixty-three percent (63%) of their clients are between 35-64. Only 3% are elderly or and 9% are under 18.

The organizations rated their service areas as an average of 4 in a scale from 1-10. The reasons given were largely related to concentrations of poverty. They commented that there are concentrations of affordable housing in certain areas of the City, but that there was still a need across the City. The vast majority responded that their clients had difficulty paying their rent/mortgage (71%) and their utilities (80%). Fifty-seven percent (57%) of their clients had experienced homelessness in the last two years.

The majority of the organizations agreed that concentration of affordable housing in certain neighborhoods and transportation or access to public transportation were the main barriers to finding good housing options in Tulsa, with 91% of respondents selecting those as top reasons.

Fair Housing Questions

There were 12 questions in the survey that specifically focused on fair housing; beginning with whether or not respondents were familiar with fair housing or anti-discrimination laws. Only 10% of those that answered were not familiar with the laws. Thirty-eight percent (38%) were somewhat familiar, and 46% were familiar or very familiar. Six (6%) were unsure. When asked about protected classes, most respondents knew about religion, race, national origin, and age, but were less sure about the other classes. When the questions delved deeper into whether people were aware of their rights, the responses were split between those that did know their rights (58%) and those that did not (42%). Knowledge of rights under Fair Housing law was partially reflected in the responses about whether they were aware of any housing discrimination incidents. Twenty percent (20%) of respondents were not sure if they knew of any incidents. That said, 50% said that they were not aware of any and 30% said they did know of incidents.

Out of the 30% that said they were aware of an incident, when asked to choose all reasons for discrimination that applied, the top reasons were: race/ethnicity (65%), physical, mental, or behavioral disability or disabling condition (60%); income level (40%); and criminal background (35%). The rest of the responses to this question were distributed among the 10 other possible choices. According to the survey, these incidents occurred in both single-family neighborhoods and in apartment complexes. Over half of respondents did not report the incident (55%), and the most common reasons given were that they did not know where to report it and that they did not think it would make a difference.

In terms of education on fair housing issues, most respondents were not aware of any fair housing or anti-discrimination education opportunities in their community (57%), and the majority of them (66%), have never participated in any kind of educational opportunity.

Open Responses

Throughout the survey, there were opportunities to give open responses. Some telling responses are as follows:

From the Organizational Survey:

"Tulsa is way too large not to have homeowner opportunities for most of its citizens. It is very hard to become a homeowner here in Tulsa if you're not wanting to do so on the north side of Tulsa. Tulsa is the largest city I've ever been in that is so racially and financially divided. And it seems like the people here in Tulsa are okay with that divided for whatever reason the Divide is. There's not equal opportunity in regard to employment homeownership or even reasonable housing if you want to choose to our need to rent. The homeless should have more opportunities and should be able to take advantage of more options for housing health and activities that would keep them off the streets if that is their choosing. This city does not properly police itself in my opinion. There never seems to be enough police to handle something proactive they just react. Tulsa has every opportunity to be a top 10 City with things like the BOK Center and some of the shared workspace even the Gathering place, but the division of race is evident that it robs some of Tulsa citizens of the opportunities that it robs the very citizens of Tulsa. I would like to see more Partnerships and training with major employers that includes public transportation so that more people can become self-sufficient by way of going to work. Working may even include a super commute to Oklahoma City if we could once and for all get a train system between Tulsa and Oklahoma City that would be a major Financial Plus for both communities."

From the Citizen Survey:

"The community need to be educated about fair housing rights and practice."

*"In Albany, NY in 2012 had a group called "United Tenants of Albany". It was basically an advocacy group that provided legal aid type services and legal advice for tenants running into housing issues. This group saved me from an eviction and I wish we had something like this in Tulsa where people knew where to go and how to report cr***y landlords doing shady stuff or working with landlords to help people avoid evictions that make it even harder to find housing later on down the road."*

"There are no rights protecting LGBTQ+ from housing discrimination in the state of Oklahoma."

Focus Group Discussions

Eight community and stakeholder focus groups were held in throughout the City of Tulsa. They were held between August 8 and August 14, 2019 and were held at City Hall as well as various community locations including the North Tulsa Library, the Community Service Council, and CAP Tulsa. Participants in the meetings included but were not limited to community residents, and members of organizations covering a range of services including economic development and job training, social services, housing, elderly and vulnerable populations, the Continuum of Care, and fair housing. The focus groups covered a broad range of issues including housing, community development, and fair housing.

The focus group discussions were guided and facilitated, but it was made clear that participants should feel free to discuss the topics that were top of mind. Participation was encouraged, and it was pointed out that community input is a critical component of the Analysis of Impediments (AI) processes. To encourage thinking about suggestions for solutions, time was set aside at the end of the hour and a half long session to talk about priorities and thoughts around action items. Participants were encouraged to think of these plans that can help guide solutions to barriers and priority issues identified.

Based on the focus groups and conversations, the following observations were raised:

- NIMBYism is still an issue
- Evictions is probably the biggest fair housing concern
- The ease with which landlords can evict tenants allows them to possibly discriminate without being overtly discriminatory. This may lead to disparate impacts.
- Should do more outreach to Hispanic communities, which Tulsa is already doing, but it is something to include in AI as a potential improvement.
- Offering trainings in Spanish and any other languages that are prevalent in the area would be helpful.
- Housing organizations are now getting more requests for accessible units.
 - With Seniors it's more about wheelchair accessibility – see it more with aging in place.
 - Increasing ADA units on new rehab projects.
- It is taking people longer to find housing that is affordable to them; student loan debt the biggest barrier.
- Need to bring the for-profit developers to a mandatory set aside of affordable housing; workforce housing is not present.
- No replacement for demolished affordable housing. Need to come up with a replacement plan for for-profit development.
- Some ideas for solutions including linkage payments, mandatory set-asides, transferring vacant properties for affordable housing.
- Need to ensure that families are not displaced; A lot of work to do on eviction side.
 - Too easy to evict.
 - Schooling disruption.
- There is a gap in affordable housing financing options.
 - Habitat for Humanity in Tulsa is looking to become a CDFI to formalize the work it is already doing with banks.
 - Currently there are no affordable housing CDFIs in Tulsa.

Fair Housing Observations

Organizations were encouraged to give written feedback on the issues they thought were most pertinent to fair housing issues in the City. Two organizations, Legal Aid Services of Oklahoma, Inc. (LASO) and Metropolitan Fair Housing Council of Oklahoma, Inc. (MFHC) provided comments on the topic, with MFHC providing data points on fair housing that will be cited in other parts of this report. MFHC is a member of the Tulsa Area Fair Housing Partnership.

LASO is one of the founding partners of the Tulsa Area Fair Housing Partnership (TAFHP) and also a committee member for the City of Tulsa's Fair Housing Committee under the Human Rights Commission (FHCHRC). Their comments are informed by the work they do on fair housing education and "having been actively involved in interacting and responding to those who are most seriously affected by fair housing barriers." A sample of quotations from their submission follows. Key among them are that:

- Under §5-104 of the Tulsa Code of Ordinances prohibits discrimination on all of the bases recognized under the FHA, and extends additional protections based on ancestry and marital status. During PY 2015, the City of Tulsa amended its City Ordinance to include additional protections against discrimination in housing based on gender identity and sexual orientation. However, some stakeholders believe that the City of Tulsa conferred rights without a mechanism for enforcement. Thus, the new and existing protections are, in their opinion, nothing more than empty rights.
- Barriers that exist due to old civil records including dismissed lawsuits and unenforceable civil judgments. Landlords rely upon a prospective tenant's rental history when determining to approve the tenant for an available housing opportunity. Old public records and judgments create the same barriers as unexpunged criminal records since landlords review the public records for any litigation that has been initiated against potential tenants. Additional education needs to occur so that Tulsa residents will know how to remove the barriers that old civil records create and also to avoid evictions.
- Redlining and steering practices also continue in Tulsa. The policies and procedures for the placement of affordable housing complexes and group homes can permit steering and redlining.
- LASO has also identified discrimination based upon sex. This practice happens regularly in Tulsa. LASO currently has a case pending against one landlord in the United States District Court for the Northern District (Tulsa) for sexual harassment.
- LASO recommends that the City of Tulsa engage in additional efforts to educate the public about the fair housing protections that the City provides as well as those provided by the State and federally. In conjunction with the need for public education, LASO recognizes the need for education for housing professionals, including landlords, lenders, real estate professionals, advertisers, insurance providers, and even city officials.
- The City and LASO previously discussed LASO investigating fair housing allegations through the testing process. LASO is willing to conduct testing and to also provide other fair housing assistance to the City of Tulsa. Fair housing enforcement naturally quells discriminatory practices.

In addition, MFHC's data points submitted as written comments include the following:

Please be advised, that during the past five years,

- MFHC processed more than one-hundred two (102) complaint intakes/inquiries originating from Tulsa,
- At least eight (8) of those complaint intakes generated complaint filings with HUD's Office of Fair Housing & Equal Opportunity,
- Two (2) of the HUD complaints have been settled with \$3,256 in Monetary Recovery through the HUD Conciliation process, the remaining cases are pending at HUD,
- Most complaint intakes/inquiries from Tulsa were resolved through fair housing and renter's rights counseling.
- At least four (4) complaints were mediated by MFHC staff with \$1,219 in Monetary Recovery for Tulsa complaining parties.

List of Key Points

While the prioritization survey was broader in scope than just fair housing issues, it touched on many elements that contribute to fair housing choice. To help prioritize, the survey was divided into three categories: essential services, housing needs, and physical and economic development needs. For each category, the priority items that relate to access to fair housing include:

Essential Services

Stability and wellbeing of residents creates better opportunities for communities overall, and the priority items in this category reflects the desire of respondents to address critical needs. The top priorities for essential services included crisis services for children and adults with 37% of respondents calling it their number one priority, followed by food security and educational programs.

Housing Needs

For housing needs the priority items included housing for seniors and the physically disabled with 30% of respondents listing it as the number one priority, and rehabilitation of owner-occupied housing with 26% of respondents listing it as their number one priority. Other possible choices included acquisition or new construction of single-family housing (20%), acquisition or rehabilitation of multi-family housing (18%), and new construction of multi-family housing (8%).

Physical and Economic Development Needs

While housing is not listed specifically in this category, the priorities reflect the need for community improvements that relate to better housing choice. The top priority in this category was infrastructure and public facility improvements (Examples: Construction or rehabilitation of sidewalks, public buildings, street lighting, bus shelters) with 45% of respondents prioritizing it as their number one. The other priorities included demolition and clearance (22%), job creation (21%), and senior centers with 12%.

SECTION IX. SUMMARY OF FINDINGS

The following is a summary of the key findings:

POPULATION

Tulsa's overall population growth remains steady. Between 2000 and 2017 the population of Tulsa has grown by 8,303 people, which is 2% growth. This growth all occurred since 2010; prior to that the population had decreased slightly. This is in contrast to the statewide population change which grew by 8.7% between 2000 and 2010, and by 3.9% between 2010 and 2017. The change in the City's population has not been geographically uniform. Many census tracts lost over 10% of their population since 2000 while others grew by 20% or more. In general, it appears tracts in the west and north parts of the City saw population loss while those on the outskirts to the east and south saw the most growth.

Tulsa's population is aging. The two age groups that saw the greatest growth in representation are 60 to 64 and 65 to 74 years old. The two groups that decreased by the largest percentage of representation are the 75 to 84 and 45 to 54 years old demographic. It is difficult to identify any clear pattern, but it appears working-age adults in the middle of their working years (35 to 54 years old), older children and college age adults (15 to 24 years old) are leaving the area while older working age adults and retirees are moving in.

Asians and Hispanics are the fastest growing demographic in Tulsa. Since 2010, the White population has shrunk by nearly 5,000 and the Black population has grown by only 600. Both groups are now less represented in the population as a whole. Hispanic/Latin residents saw the largest growth with approximately 13,500 new residents in the area while Asian residents had the largest relative growth growing from 8,591 to 13,304. Further, the use of Spanish at home has increased steadily in Tulsa between 2010 and 2017.

The city appears to be deconcentrating when it comes to race. In 2010, the northwestern corner of the City had the largest concentration of Black residents. Despite making up only 15.5% of the population many of these tracts had a Black population of 40% or more. The majority of the City had a black population of less than 10%. In 2017, the distribution pattern of Black residents is similar to 2010 but it is less concentrated than before. The Native American population represents 4.5% of the City of Tulsa. In 2010, many southeastern tracts had 8% or more of the population that identified as Asian while tracts in the rest of the City were generally under 2%. In 2017, Asian residents are distributed more evenly across the City than in 2010 but there are still concentrations in the southeast. In 2019 there were many tracts with a Native American population that is higher than average, often more than 8%. There appears to be even less racial concentrations of this group in 2017. Hispanic/Latin residents in 2010 were heavily concentrated in the northeast part of the City with a few other census blocks with a large population. These areas were 40% or more Hispanic/Latin. In 2017, it appears that the ethnic concentration is less pronounced than in previous years. Fewer tracts have relatively large or small Hispanic populations.

POVERTY

The poverty rate in the City has gone up for all age groups except for 65 years old and older. The largest increase was 18 to 64 years old but the Under 18 population has the highest overall poverty rate of 31%.

Poverty is heavily concentrated in the northwest corner of the City, which has the largest Black populations. Many of the tracts there have a poverty rate of 40% or higher. This stands in stark contrast to areas to the south and southeast where the poverty rate is less than one-quarter of northwestern tracts. Further, the northwest part of the City has an unemployment rate that is much higher than other parts of the City. Tracts in this area have an unemployment rate of 12% or more, which is more than four times the rate found in some other parts of the City.

The southern areas of Tulsa have a much higher percentage of people with a Bachelor's degree or higher. By contrast, much of the northern areas of the City have a lower percentage of people with a Bachelor's degree. As educational attainment directly impacts a person's income, the northern areas are at higher risk of exposure to poverty and other economic challenges.

While the number of higher income earning groups is increasing in the City, there remains a significant number of households earning lower incomes. It is not surprising that households with low-income experience poverty, housing cost burden and a lower quality of life to a higher degree than higher income earning households. Currently, there are over 45,000 households that still make less than \$25,000 per year – that is over a quarter of the total households in Tulsa.

Meeting basic needs appears to be a problem for many residents. The 2018 Gallup-Tulsa Citivoice Index Results indicated that nearly one-third of residents said that there have been times in the past 12-months when they didn't have enough money to buy food. Over a third of residents also said they did not have money to pay for healthcare or medicine for their families. With a significant portion of Tulsa's residents experiencing cost burden and challenges to afford food and healthcare, access to basic needs remains a primary challenge for the City. These problems are particularly pronounced for low income household. Organizational Survey Respondents reported that their clients had difficulty paying their rent/mortgage (71%) and their utilities (80%). Fifty-seven percent (57%) of their clients had experienced homelessness in the last two years.

DISABILITY

In Tulsa, there are nearly 60,000 total residents with a disability, making up 14.8% of the population. Unsurprisingly, residents who are elder tend to have more disabilities than those who are younger. Over half of the residents over the age of 75 have a disability. There appears to be a concentration of people with disabilities in the northwest corner of the City. This area is primarily Black and many tracts have disability rates of over 20%.

Fair Housing Complaints are most likely to cite disability as a basis for the claim with a focus on reasonable accommodations. An analysis of HUD FHEO fair housing complaints revealed that disability followed is by far the most commonly cited basis for complaints. About 65.4% of the bases across all complaints cite disability. Between 2015 and 2018, 34 total cases cited disability. Of these, 32 included failure to make or allow reasonable accommodations as a concern.

Community outreach indicated housing for seniors and the physically disabled was in the highest demand. Thirty percent of respondents listed it as the number one priority,

HOUSING

Tulsa's overall housing stock is slightly shrinking, but the number of rental units is growing. Since 2010, the number of housing units in the City fell by approximately 500 units. Owner occupied units fell by over 5,000 units while renter occupied units grew by a similar amount.

The number of vacant units in the City grew by approximately 2,000 units and currently makes up 12.2% of the housing units. Two types of homes, "Sold, not occupied" and "Other Vacant", both saw an increase

in the number of vacant units. “Other Vacant” grew by over 2,000 units and now makes up nearly 40% of the vacant housing stock. Vacant housing units appear to be more common in the north part of the City, particularly in the northwest. Over 25% of all units are vacant in some of these areas. By contrast, areas to the southeast have vacancy rates of under 10%.

Renters, by far, face being cost burdened more than any other group. There are nearly 35,000 renters that are cost burdened, over 46% of all renters. The majority of these renters pay over 35% of their income to housing costs. However, there is not a clear pattern of cost burdened homeowners throughout the City. Even with the increase in rental units over the past several years, rent has continued to climb significantly. This indicates that demand is still high for rental units, and there is a need for affordable units.

Survey results revealed that the most common housing and neighborhood concern is the condition of housing. The most common response at 60% was houses were in poor condition in their neighborhoods. Forty-three percent (43%) said that their neighborhoods had abandoned homes or homes in disrepair. Forty-one percent (41%) cited vandalism as a problem, and 38% were dissatisfied with the local services including trash pickup and street maintenance. Thirty-one percent (31%) said that they experienced problems with the maintenance of their plumbing, electrical, appliances and other items in their homes.

LENDING

The percentage of loan application denials for traditional home purchase loans for one-to-four family housing in Tulsa varies by race/ethnic groups. The largest applicant group in 2017 were non-Hispanic Whites (76 percent) followed by Hispanics (8 percent) and American Indians (7 percent). Asian applicants represented 5 percent of all home purchase applications while Black applicants represented 4 percent. In 2017, Whites were least likely to be denied for conventional single family home purchases, being denied at a rate of 5.5 percent, with Asians close behind at 5.7 percent. American Indians were denied at 11 percent while Hispanics were denied at a rate of 13 percent. Black applicants faced the highest conventional home purchase denial rate at 14 percent.

High Income Blacks (having greater than 120 of Area Median Income) were nearly just as likely to be denied for a single family home purchase, at 8 percent, than Low Income Whites (having less than 80 percent of Area Media Income), at 9 percent. Low Income Blacks were the group with the highest home purchase denial rate at 14 percent, more than 3 times the rate of High Income Whites and High Income Asians. Asian applicants demonstrated the lowest disparity in denial rates between low- and high-income applicants, at 2 percent, while the gap between low- and high-income applicants for Hispanics was approximately 7 percent, more than any other group.

Denial reasons differ by Race/Ethnicity. As of 2017, the leading denial reason for High Income Whites was lack of collateral, representing over a quarter of all denials for High Income. High Income Black, Hispanic, and American Indian applicants, by contrast, were most likely to be denied for credit history, at over 40 percent in the case of High Income Blacks.

Blacks and Hispanics are twice as likely to receive a subprime loan, at 12 percent, than Whites, at 6 percent, as of 2017. As a percentage of all subprime loan originations within Tulsa, home purchases represented 74 percent in 2017, up from its share of 45 percent in 2007 and a low of 33 percent in 2009.

FAIR HOUSING

Race/Ethnicity was the most common fair housing concern noted in survey responses. Out of the 30% of survey respondents who said they were aware of an incident of discrimination, when asked to choose all reasons for discrimination that applied, the top reasons were: race/ethnicity (65%), physical, mental, or behavioral disability or disabling condition (60%); income level (40%); and criminal background (35%). Over half of respondents did not report the incident (55%), and the most common reasons given were that they did not know where to report it and that they did not think it would make a difference.

Fair Housing Complaints are most likely to cite disability as a basis for the claim with a focus on reasonable accommodations. An analysis of HUD FHEO fair housing complaints revealed that disability is by far the most commonly cited basis for complaints. About 65.4% of the bases across all complaints cite disability. Between 2015 and 2018, 34 total cases cited disability. Of these, 32 included failure to make or allow reasonable accommodations as a concern.

According to survey results, the City's residents are not well educated on fair housing issues. Most respondents were not aware of any fair housing or anti-discrimination education opportunities in their community (57%), and the majority of them (66%), have never participated in any kind of educational opportunity.

Tulsa is ranked 11th in the nation for evictions. The ease with which landlords can evict tenants allows them to possibly discriminate without being overtly discriminatory. This may lead to disparate impacts.

The City has amended its City Ordinance to include additional housing protections for individuals based upon their sexual orientations and gender identities, but more work is needed. Stakeholders opined that the City conferred rights without a mechanism for enforcement.

Stability and wellbeing of residents creates better opportunities for communities overall, and community outreach indicated a need to better address critical needs. The top priorities for essential services included crisis services for children and adults with 37% of respondents calling it their number one priority, followed by food security and educational programs.

SECTION X. IMPEDIMENTS AND SUGGESTED ACTIONS

Impediments

The purpose of fair housing planning and analysis is to foster a careful examination of factors which restrict fair housing choices. A review of the data, research, public outreach and other information collected from a wide range of sources assists in identifying impediments and developing a greater understanding of the conditions that affect fair housing choice for the residents of Tulsa, and in particular for the City's protected classes and special needs populations. Such data included census data, fair housing complaints, lending and foreclosure, legal statutes, barriers to affordable housing and public input through surveys and forums.

HUD provides a definition of impediments to fair housing choice as:

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

The impediments to fair housing choice identified as a result of this Analysis of Impediments are summarized below.

Impediment #1 *Lack of knowledge of fair housing laws and fair housing resources among the general public, housing providers and policy makers*

- The general public often does not understand fair housing rights or the fair housing complaint processes;
- Fair housing opportunities are not readily available to residents with limited English proficiency.

Impediment #2 *Disproportionate Housing Problems for Minorities and Special Needs Populations*

- Substandard housing is an issue in low income and minority communities;
- Accessible and affordable housing choices for persons with disabilities and the elderly may not be keeping pace with demand;
- Tulsa's landlord friendly eviction process is more likely to affect vulnerable populations such as low income families, people with disabilities, and people with limited English proficiency.
- Access to lending opportunities to purchase homes is limited for low income and minority populations.

Impediment #3 *Economic barriers due to limited supply of adequate and accessible affordable housing*

- High costs, especially for extremely low- and very low- income renters who face significant affordability "gaps";
- High vacancy rates and substandard housing in areas of the city that are "affordable" leave limited options for low- and very low-income renters.

Impediment #4 *Lack of access to transportation options reducing housing and economic opportunities*

- Areas of the city that are outside major corridors struggle with access to public transportation;

- Lack of access impedes residents' ability to efficiently get to job centers, educational opportunities, and services for basic needs such as health care and grocery stores; and
- People with disabilities and the elderly have greater challenges in finding accessible transportation.

Actions

This update to the AI builds upon the previous studies, surveys and public input. It analyzes data and identifies the private and public sector conditions that foster housing discrimination and provides recommended actions to overcome the effects of the fair housing issues identified. Several of these actions address multiple impediments and linkages among them are noted.

It is the goal of the City to undertake actions that can help reduce and eliminate existing housing discrimination and prevent its reemergence in the future, as well as to address other impediments to equal housing opportunity. While the City cannot control systemic issues related to fair housing and fair housing choice challenges, the City can work to coordinate actions that improve fair housing, encourage coordination among disparate public entities, encourage stakeholders to act and report on fair housing issues, analyze existing data sources, report progress on fair housing issues, highlight findings from data analyses, and encourage meaningful action and cooperation at community levels.

Given these constraints, the City will undertake actions each year aimed at addressing fair access to housing and fairness of housing choices for City residents. These may include some of the actions outlined below, or other actions that may be subsequently identified as relevant and potentially effective in combating and eliminating impediments to fair housing choice. Specific activities that may support those actions are itemized as well.

Action #1 Address Lack of Knowledge of Fair Housing

- Support fair housing training and education opportunities throughout the City, specifically for rental properties that will be directed to housing service providers, management companies, and rental residents.
- Ensure training opportunities for rental residents include information on the Oklahoma Landlord Tenant Act to clearly inform this population on their rights and responsibilities. Ensure these trainings are offered in English and Spanish.

Action #2 Address Disproportionate Housing Problems and Economic Barriers

- Coordinate clearance and demolition efforts with homeowner rehabilitation and single-family housing development to improve neighborhoods that currently have a high percentage of vacant and abandoned properties.

- During the grant allocation process give special consideration to rental housing development which includes at least 10% accessible units and single-family housing which includes universal design.
- Provide homebuyer education using HUD approved counselors. Ensure training is available in Spanish and English.

Action #3 *Address Lack of Access to Transportation Options Reducing Housing and Economic Opportunities*

The implementation of a Bus Rapid Transit (BRT) system, branded AERO BRT, will provide enhanced bus service in two key corridors of the city by reducing travel times and providing a high level of passenger amenities. These high-capacity transit lines will connect people to jobs and other major destinations in the City. The BRT system will operate 7 days a week every 15 minutes weekdays and 20-30 minutes on weekends. The first BRT route will run north and south along Peoria Avenue from 54th Street North to 81st Street South. The second corridor will run east and west from downtown along 11th Street corridor out to 145th East Ave.