

2015 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE



THE CITY OF TULSA

**FINAL REPORT
MARCH 20, 2015**

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
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>

**Oklahoma Attorney General's Office
Office of Civil Rights Enforcement**

907 S. Detroit, Suite 750
Tulsa, OK 74120

Telephone: (918) 581-2201

Website: http://www.ok.gov/oag/About_the_Office/OCRE.html

Complaint Form Available From (PDF): <http://www.ok.gov/oag/documents/OCRE%20-%20Housing%20Discrimination%20Form%20fillable.pdf>

City of Tulsa Human Rights Department

175 East 2nd Street

Room 411 (Fourth Floor)

Tulsa, Oklahoma 74103

Telephone: (918) 596-7818

Email: humanrightsrec@cityoftulsa.org

Metropolitan Fair Housing Council of Oklahoma, Inc.

1500 Northeast 4th Street, Suite 204

Oklahoma City, Oklahoma 73117

Telephone (Local): (405) 232-3247

Telephone (Toll Free): 1 (866) 677-7541

Legal Aid Services, Tulsa Law Office

907 South Detroit Avenue, Suite 725

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**2015 CITY OF TULSA
ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE:**



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TABLE OF CONTENTS

EXECUTIVE SUMMARY	1
SECTION I. INTRODUCTION	13
SECTION II. SOCIO-ECONOMIC CONTEXT	21
Demographics	21
Economics	30
Housing	37
SECTION III. FAIR HOUSING LAW, STUDY, AND CASE REVIEW	51
Fair Housing Laws	51
Fair Housing Studies	52
Fair Housing Cases	56
SECTION IV. REVIEW OF THE EXISTING FAIR HOUSING STRUCTURE	61
Fair Housing Agencies	61
Complaint Process Review	66
SECTION V. FAIR HOUSING IN THE PRIVATE SECTOR	69
Lending Analysis	69
Fair Housing Complaints	89
Fair Housing Survey – Private Sector Results	97
SECTION VI. FAIR HOUSING IN THE PUBLIC SECTOR	101
Public Services	101
Fair Housing Survey – Public Sector Results	102
SECTION VII. PUBLIC INVOLVEMENT	107
Fair Housing Survey	107
Fair Housing Forum	110
Presentation of Draft AI Before the City Council	110
SECTION VIII. SUMMARY OF FINDINGS	113
SECTION IX. IMPEDIMENTS AND SUGGESTED ACTIONS	119
SECTION X. GLOSSARY	125
APPENDICES	129

EXECUTIVE SUMMARY

AI PURPOSE AND PROCESS

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

- 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.¹

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

The AI process affirmatively furthers fair housing 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 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

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

origin, sex, disability, and familial status². In addition, the State of Oklahoma extends protections on all of these bases and extends additional protection based on age. Finally the City of Tulsa guarantees protection from discrimination in the housing market on all of the bases covered by the Fair Housing Act, as well as additional protections based on ancestry and marital status.

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 presented on the previous page.

This AI was conducted through the assessment of a number of quantitative and qualitative sources. Quantitative sources used in analyzing fair housing choice in the 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 national and city fair housing legal cases. Additionally, this research included the evaluation of information gathered from several public input opportunities conducted in relation to this AI. This also included the 2015 City of Tulsa Fair Housing Survey distributed to stakeholders, interested parties, and participants in the public input process.

Geographic analyses of racial and ethnic distribution were conducted by calculating race or ethnicity as the percentage of total population and then plotting the data on a geographic map of Census tracts in the City of Tulsa. For the purposes of this AI, maps were produced for several racial and ethnic groups based on both 2000 and 2010 Census data in order to examine how the concentrations of these populations changed over time.

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. Analysis of demographic, economic, and housing data included in that review establish the context in which housing choices are made. Demographic data indicate the sizes of racial and ethnic populations and other protected classes; economic and employment data show

² 42 U.S.C.A. §3601

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

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

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

Socio-Economic Context

For the first few years after 2000, the population of Tulsa was in decline. However, thanks to strong growth after 2005, the city's population had nearly rebounded to 2000 levels by 2010. This was largely due to an increase the number of residents aged 55 to 64, along with a slight increase in the number of residents aged less than five years. The number of residents in all other age groups decreased, though in the case of residents aged over 65, that overall decline masked a modest increase in the number of residents aged 65 to 66 and 85 or over. Residents aged 35 to 54 accounted for the largest share of residents in 2010 at around a quarter of the population. However, even this relatively large share represented a decline from 28.3 percent in 2000.

White residents accounted for the largest share of the overall population in 2000 and 2010; however, this share became smaller over the decade as the number of white residents in the city fell by 11 percent. The number of black residents grew slightly, and black residents retained roughly the same share of the overall population between Census counts. Hispanic residents, on the other hand, nearly doubled in number and as a share of the overall population, representing 14.1 percent of the city's residents in 2010. In 2000 and 2010, black and Hispanic residents were observed to be concentrated to the north and northeast of the city center, respectively.

Residents with disabilities accounted for 20.5 percent of the population in 2000. In that year, residents with disabilities tended to live close to the city center, particularly in areas to the north and east of the city center. In 2008-2012, 14.8 percent of the population was living with some form of disability³.

The number of employed persons in the city fell steadily after 2000, and continued to do so until around 2005. By contrast, the labor force grew from 2000 through 2002, contributing to growth in the unemployment rate, which peaked in 2003 at 6.6 percent. After 2003, the unemployment rate began to fall; however, it increased dramatically in 2009 as approximately

³ Note: the conceptual framework employed by the Census bureau concerning disability was revised significantly after 2000. These revisions were put into place in 2008. The Census bureau discourages direct comparison between post-2008 and pre-2008 disability figures, as these figures capture different, though overlapping, subsets of the population.

7,000 workers lost their jobs. The unemployment rate continued to rise through 2010, peaking at 7.3 percent in that year. The number of employed persons in the city began to increase after that year; however, the number of full- and part-time jobs in the county did not begin to grow again until the following year.

The period between 2006 and 2010 was also a time of considerable fluctuation in earnings and income, as measured in real dollars. By 2006, the average worker was earning just over \$60,000 at his or her job, in real dollars. The following year, earnings fell by nearly \$4,000; the year after that, they grew by over \$5,000. This pattern continued through 2010, and was reflected in trends in per capita income, which also fluctuated considerably during this time period. However, growth in earnings and income has largely been positive and steady since 2010. Growth in earnings and income in the city since 2000 was reflected in increasing household incomes since that year, as measured in current dollars.

In spite of increasing earnings and income in the city, the poverty rate climbed from 14.1 to 19.7 percent between 2000 and 2008-2012. Census tracts with disproportionately high shares of households in poverty were concentrated in the northwest of the city in 2000 and 2008-2012, in areas that were observed to hold high concentrations of black and Hispanic residents.

The number of housing units in the city increased slightly between 2000 and 2010. However, in keeping with the overall reduction in the city's population during that time, the number of occupied units fell by 1.1 percent. This was largely a result of a reduction in owner-occupied units; the number of renter-occupied units increased by 3.6 percent during this time. However, growth in the number of vacant units was more pronounced, and these units came to account for over 11 percent of the total housing stock by the end of the decade. The number of vacant housing units for sale grew over the decade, outpacing the increase in the number of vacant units overall. However, the number of "other vacant" units grew at a faster pace still, nearly doubling over the decade. These units were observed to be concentrated in the area to the north of the city center. Unfortunately, these units may represent a blighting influence where they are grouped in close physical proximity.

Households also increased in size between the two Censuses as the number of two-, three-, and four-person households fell. Though the number of one-person households grew slightly between 2000 and 2010, this growth was minor compared to the growth in the number of households with five members or more. The composition of the city's housing stock did not change much with respect to the type of housing, and single-family units were the most common type in both years.

Households were less impacted by most of the housing problems described in Census data, with the exception of cost-burdening. In spite of the increase in the size of households after 2000, the share of overcrowded housing units fell by 0.2 percentage points. Housing units are considered overcrowded when they include more than one resident per room on average, and are considered severely overcrowded when the number of residents exceeds 1.5 per room. The share of severely overcrowded households likewise fell by 1.3 percentage points. The prevalence of housing units with incomplete plumbing and kitchen facilities was also very low, and decreased between 2000 and 2012. Considerably more households were affected by high housing costs relative to their income, or "cost-burdening". Households are considered to be cost-burdened when more than 30 percent of their monthly income goes toward housing costs,

and severely cost-burdened when housing costs claim more than 50 percent of their income. Nearly 19 percent of households were cost-burdened in 2008-2012, and 15.5 percent were severely cost-burdened. Unfortunately, these figures represent a considerable increase over 2000; these increases came as median housing costs grew between 2000 and 2012. In 2000, the median contract rent was \$511; by 2012, this figure had grown to \$566. Home values grew from \$83,600 to \$121,700 over the same time period.

Review of Fair Housing Laws, Studies, and Cases

Tulsa residents are protected from discrimination in the housing market by laws at the federal, state, and local levels. The federal Fair Housing Act serves as the foundation for fair housing policy in the United States, prohibiting discrimination on the bases of race, color, sex, religion, national origin, disability, and familial status. State law extends protections to Oklahoma residents based on these same attributes, and extends additional protection based on age. Tulsa law, while extending no protections based on age, expands on the list of protected classes in the FHA by prohibiting discrimination on the basis of ancestry and marital status. In spite of these protections, national studies indicate that illegal discrimination in the housing market continues, though such discrimination is rarely overt.

Fair Housing Structure

Tulsa residents who believe that they have been subjected to unlawful discrimination in the housing market may seek recourse from agencies and organizations at the federal, state, and local levels. Fair Housing law and policy is directed at the national level by HUD, which accepts complaints from anyone who believes that he or she has been the victim of discrimination outlawed under the Fair Housing Act. The Oklahoma Attorney General's Office of Civil Rights Enforcement enforces the state human rights law, while Tulsa's human rights ordinance is enforced by the Tulsa Human Rights Department. Tulsa residents may also file complaints with the Metropolitan Fair Housing Council, which will conduct an investigation of the complaint and direct the complaint to the appropriate enforcement agency. The Metropolitan Fair Housing Council coordinates on fair housing enforcement and investigation with Legal Aid Services of Oklahoma, which offers legal services to Oklahoma residents who feel that they have been subjected to illegal housing discrimination. Finally, a group of eleven local organizations and agencies, including the Tulsa Housing Authority, make up the Tulsa Area Fair Housing Partnership, which works to promote awareness of fair housing law and policy, and to ensure that Tulsa residents enjoy their right to fair housing choice.

Fair Housing in the Private Sector

Tulsans and prospective Tulsans applied for 35,946 home purchase loans from 2008 through 2012. Over 90 percent of these loan applications were for housing units in which the applicants intended to live; these loans are designated "owner-occupied" home purchase loans. Just over 13 percent of these owner-occupied home purchase loans were denied over the five-year period. Loan applications more frequently ended in denial in the northern portion of the city, particularly in the area north of Interstate 244. Denial rates also varied considerably by gender, race, and ethnicity: 13.5 percent of female applicants were denied loans from 2008 through 2012, compared to a denial rate of 12 percent for male applicants. Similarly, more than 22 percent of loan applications from black applicants were denied compared to a denial

rate of 11.1 percent for white applicants. Meanwhile, the denial rate for Hispanic applicants exceeded that of non-Hispanic applicants by over ten percentage points. Black applicants tended to be denied more frequently in Census tracts outside of the area in which black residents were highly concentrated, notably in the city center and areas to the northeast of the city center. Hispanic residents were subject to high rates of loan denials in areas throughout the northern part of the city. As one might expect, the rate of loan denials fell as the income of the applicant increased; however, applicants of different races and ethnicities continued to be subject to different denial rates, even when they were similarly situated with respect to income.

Those applicants who were able to secure a home purchase loan were sometimes issued loans with high annual percentage rates (HALs). In all, 4.5 percent of borrowers paid interest rates on those loans that exceeded treasury rates for comparable loans by three percentage points. The incidence of such predatory style lending dropped considerably after 2008. In keeping with trends in loan denials was the impact of race and ethnicity on HAL rates: 7.6 percent of loans issued to black residents were HALs, and 6.2 percent of loans issued to Hispanic residents were predatory in nature. By comparison, the HAL rates for white and non-Hispanic residents were 4.4 and 4.3 percent, respectively. Borrowers in general were more likely to be issued HALs in the area to the north and northeast of the center of town, which held relatively high concentrations of black and Hispanic residents. Black residents tended to be issued HALs outside of areas with high concentrations of black residents, while Hispanic residents were often subject to high rates of predatory style lending in areas with high concentrations of Hispanic residents.

Small business lending in the city was observed to vary considerably according to the median income of the Census tracts in which these loans were issued. Less than four percent of the small business loans reported under the Community Reinvestment Act (CRA) were issued in tracts in which the median family income was less than half of that of the area as a whole. By contrast, nearly half of these loans were issued in Census tracts with median incomes at or above 120 percent of the area median. The central area was the target of considerable investment, as was a large Census tract that lay along the Broken Arrow Corridor. By contrast, relatively few small business loans were issued to the north of the city center.

HUD, the Tulsa Human Rights Department, and the Metropolitan Fair Housing Council all provided data on complaints that they received from city residents. More than half of the complaints that HUD received during the period from 2004 through August 2014 cited discrimination on the basis of disability, or 113 complaints. Race was the second most common complaint basis, and was cited in 84 complaints. Failure to make reasonable accommodation was a common allegation in these complaints, as were allegations of discrimination in the rental housing market. Disability and race were also the most common bases for complaints lodged with the Human Rights Department and the Metropolitan Fair Housing Council.

The perception of discrimination in the rental housing market was also relatively common among respondents to the 2015 City of Tulsa Fair Housing Survey. Around 30 percent of respondents reported being aware of discrimination in that area, while a quarter of respondents maintained that they were aware of discrimination in the real estate industry and around 20 percent had perceived discrimination in the mortgage and home lending industry. Specific violations of fair housing policy cited by survey respondents included tacit refusal to rent to

racial minorities and families with children, steering in the real estate market, and differential treatment in home lending on the basis of race. In addition, survey respondents noted a failure on the part of housing designers and builders to include accessible features in new housing units.

Fair Housing in the Public Sector

The review of fair housing in the public sector involved an examination of the distribution of subsidized housing units in the city, as well as the extent of the public transit network and the location of employment centers, along with analysis of the results of the 2015 Fair Housing Survey. Subsidized housing units tended to be located near areas with above-average poverty rates and concentrations of black and Hispanic residents, and were often not well-connected by public transit to the city's employment centers. In fact, the perceived shortcomings of the transit system was a subject of wide agreement on the part of survey respondents: 43 percent of respondents claimed to be aware of barriers to fair housing choice in the provision of government services in the city, and many who provided additional commentary cited the limitations of the transit system as a barrier to those with limited personal transportation options. In addition, survey respondents perceived the influence of NIMBYism in zoning and land-use laws in the city, and maintained that neighborhood opposition to affordable and subsidized units represented a barrier to fair housing choice in the city.

Public Involvement

Public input during the 2015 AI process was sought through the solicitation of citizen participation in the 2015 Fair Housing Survey, along with the Fair Housing Forum held in the city in October of 2014. Those who participated in the survey were generally supportive of the goals of fair housing laws and policies, though many felt that the laws are difficult to understand or follow. Furthermore, many respondents felt that current fair housing laws are not sufficiently enforced, and need to be expanded to include protections based on sexual orientation. Survey respondents were also largely unaware of local fair housing laws or plans, though many were aware of specific geographic areas that they considered to have significant fair housing problems, including north, west, and south Tulsa. Participants in the October Fair Housing Forum highlighted several challenges to fair housing policy in the city, including NIMBYism, the need to promote inclusionary zoning, the need to update the city's fair housing policy, and economic challenges facing north Tulsa. Finally, the findings from the AI process were presented to the city council on February 20, 2015.

IMPEDIMENTS TO FAIR HOUSING CHOICE AND SUGGESTED ACTIONS

Private Sector Impediments, Suggested Actions, and Measurable Objectives

Impediment 1: More frequent denial of home purchase loans to black, Hispanic, and female loan applicants. This impediment was identified through review of data gathered under the Home Mortgage Disclosure Act (HMDA), as well as the results of the 2015 Fair Housing Survey. While HMDA data do not include some information that is highly pertinent to the loan application process, such as the credit score of the applicant or prospective down payment amount of the loan, these data do allow the researcher to gauge the experience of individuals entering the housing market, and determine whether the likelihood of being issued a loan

varies with the race, ethnicity, or sex of the applicant. According to those data, black residents were nearly twice as likely as white residents to be denied a home purchase loan from 2008 through 2012. Likewise the denial rate for Hispanic applicants exceeded the denial rate for non-Hispanic applicants by over ten percentage points, and the denial rate for female applicants exceeded that of male applicants by around 1.5 percentage points on average. Survey applicants also cited a perceived differential treatment of loan applicants based on race as a barrier to fair housing in the city.

Action 1.1: Enhance outreach activities for prospective homebuyers.

Measurable Objective 1.1: The number of outreach activities taken

Action 1.2: Enhance homebuyer classes making buyers aware of high denial rate histories.

Measurable Objective 1.2: The number of enhanced classes given

Impediment 2: Apparent predatory lending falls more heavily on black and Hispanic borrowers. According to home loan data collected under the HMDA, 4.5 percent of home purchase loans issued in the city were predatory in nature (HALs). However, the rate of HALs to black borrowers was over 3 percentage points higher than the HAL rate for white borrowers (See Appendix E, Tables E.8 through E.10). Similarly, Hispanic applicants were considerably more likely than non-Hispanic applicants to be issued a loan with a high annual percentage rate. Further support for these trends was found in the perceptions of survey respondents, who maintained that racial and ethnic minorities are more subject to predatory style lending than white or ethnic majority borrowers.

Action 2.1: Enhance outreach activities for prospective homebuyers.

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

Impediment 3: Discriminatory terms, conditions, privileges, or facilities relating to rental, and refusal to rent. This impediment was identified through review of the 2015 Fair Housing Survey, as well as complaints lodged with HUD and the Metropolitan Fair Housing Council (Metro Fair Housing). Approximately thirty percent of survey respondents stated that they were aware of barriers to fair housing choice in the rental housing market. In addition, around 30 percent of complaints lodged with HUD cited discrimination in the rental market specifically, and a majority of fair housing tests conducted by Metro Fair Housing concerned discrimination in the rental market.

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

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

Impediment 4: Failure to make reasonable accommodation or modification. Discrimination on the basis of disability was, by a wide margin, the most common complaint that HUD received from Tulsa residents from 2004 through August 2014. More than half of these complaints alleged discrimination on the basis of disability, and failure to make reasonable accommodation was a common complaint issue. Similarly, around three-fifths of complaints lodged with the City of Tulsa Human Rights Department concerned discrimination on the basis of disability, along with just under half of the complaints received by Metro Fair Housing. Accessibility issues also triggered just under half of the fair housing tests conducted by Metro Fair Housing from 2011 through 2013.

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.

Measurable Objective 4.1: The number of trainings to program managers that were enhanced per year

Action 4.2: Enhance outreach and education for housing providers, advising them that they may not stand in the way of making reasonable accommodation or modification.

Measurable Objective 4.2: The number of outreach and education activities taken for providers

Impediment 5: Steering and redlining appears in Tulsa. This impediment was identified through review of the 2015 Fair Housing Survey. Redlining was perceived to impact housing choice through policies and practices in the home insurance and appraisal industries, as well as through property tax policies. For example, in commentary submitted with a survey question concerning home insurance, approximately one-third of commenters identified redlining as a fair housing issue in the city, or described practices that amount to redlining. In addition, respondents cited steering as a barrier to fair housing choice in the real estate industry. In a question concerning perceived discrimination in the real estate market, approximately half of commenters specifically identified “steering”, or practices that amount to steering, as a fair housing issue in Tulsa.

Action 5.1: Verify testing is performed to uncover the degree of steering and redlining that appears to be occurring in the city.

Measurable Objective 5.1: Number of tests or other alleged steering and redlining issues reported by local non-profits and other organizations.

Impediment 6: Insufficient understanding of Fair Housing laws. This impediment was identified through review of the Public Involvement segment of the 2015 Fair Housing Survey. Though many respondents considered themselves to be familiar with fair housing laws, nearly a quarter professed to be unfamiliar with such laws. In addition, a majority of respondents maintained that there was no training process available to learn about fair housing laws, or that they didn’t know about such opportunities. In addition, nearly 45 percent of respondents maintained that fair housing laws are difficult to understand or follow.

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 Human Rights Department and Human Rights Commission

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

Impediment 1: Insufficient understanding of Fair Housing laws. This impediment is listed as a public sector impediment to underscore the fact that private and public sector factors may contribute to a limited understanding of fair housing laws and policies, as well as to suggest that addressing this impediment will require engagement on the part of private and public sector actors. The impediment was identified through review of results to the 2015 Fair Housing Survey, which included a question on whether or not fair housing laws should be changed, and on the types of changes that respondents would like to see. Many proposed changes focused on the need to clarify fair housing laws, and to promote education and enforcement on fair housing policies. In addition, nearly thirty percent of respondents who shared desired changes to fair housing laws identified a need for additional fair housing protections on the basis of sexual orientation and gender identity.

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

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 protection for individuals with respect to sexual orientation and gender identity.

Impediment 2: Concentrations of assisted housing exist in Tulsa. This impediment was identified through analysis of the geographic distribution of assisted housing units in the city. These units tended to be located in areas with above-average and disproportionate rates of poverty, as well as in areas with relatively high concentrations of black and Hispanic residents.

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

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

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.

Impediment 3: NIMBYism; multi-family housing discouraged. This impediment was identified in consultation with Tulsa stakeholders during the 2014 Fair Housing Forum, as well as in review of the results of the 2015 Fair Housing Survey. According to one forum participant, neighborhood opposition to affordable housing projects is "getting worse all of the time", and another commenter noted that there is a "stigma" attached to affordable housing units that inspires particularly strong opposition to these units. NIMBYism was also identified as a barrier

by survey respondents who, like the forum participants, perceived the influence of NIMBYism in zoning and land-use decisions in the city.

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.

Impediment 4: Zoning works against affordable housing. This impediment was also identified through review of survey results and the discussion at the 2014 Fair Housing Forum. Zoning and land-use decisions were perceived to be subject to NIMBYism, which served to bar affordable housing from many areas in the city. In addition, survey respondents cited the need for changes to the zoning code itself to provide for more inclusionary zoning.

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.

Measurable Objective 4.2: Number of attempts to change zoning codes.

Impediment 5: Inadequate code enforcement for some areas. This impediment was identified through review of the 2015 Fair Housing Survey. Over 20 percent of respondents maintained that they were aware of practices and policies in occupancy, health, and safety code enforcement that amounted to barriers to fair housing choice.

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.

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.

Impediment 6: Lack of a sufficient public transit system. This impediment was identified by participants in the 2014 Fair Housing Forum and 2015 Fair Housing Survey, as well as through review of the transit network that is currently in place. Many survey respondents shared the sentiment that the current transit network does not adequately serve the needs of the city, and this perception was reflected in commentary at the Fair Housing Forum. Furthermore, review of the city's transit network suggested that many of the area's public housing units are not well-connected to the city's employment centers.

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 City of Tulsa to address this need.

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)⁴, and Housing Opportunities for Persons with AIDS (HOPWA) programs into the Consolidated Plan for Housing and Community Development, which then created a single application cycle.

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

⁴The Emergency Shelter Grants program was renamed the Emergency Solutions Grants program in 2011.

- “Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices [and]
- Any actions, omissions, or decisions which have [this] effect.”⁵

State and local governments may enact fair housing laws that extend protection to other groups as well. 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. A comparison of protected class designations by federal and city law is presented below in Table I.1.

Table I.1
Comparison of Fair Housing Laws

City of Tulsa

Protected Group	Federal Fair Housing Act	Oklahoma Fair Housing Law	City of Tulsa Human Rights Law
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

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;

⁵ *Fair Housing Planning Guide.*

- Promoting housing that is physically accessible to, and usable by, all persons, particularly individuals with disabilities; and
- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act.”⁶

The objective of the 2015 AI process 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.

LEAD AGENCY

The agency that led the effort of preparing this report on behalf of the City of Tulsa was the City of Tulsa Finance Department, Division of Budgets and Grants.

Commitment to Fair Housing

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

GEOGRAPHIC SCOPE OF THE ANALYSIS

This AI addresses the status of fair housing within the City of Tulsa. Map I.1 on the following page displays the City of Tulsa, along with selected major highways and county and Census tract boundaries. For the purposes of this AI, the area identified in the following narrative as the “city center” roughly corresponds to the area bounded by Interstate 244, Highway 64, and Highway 75.

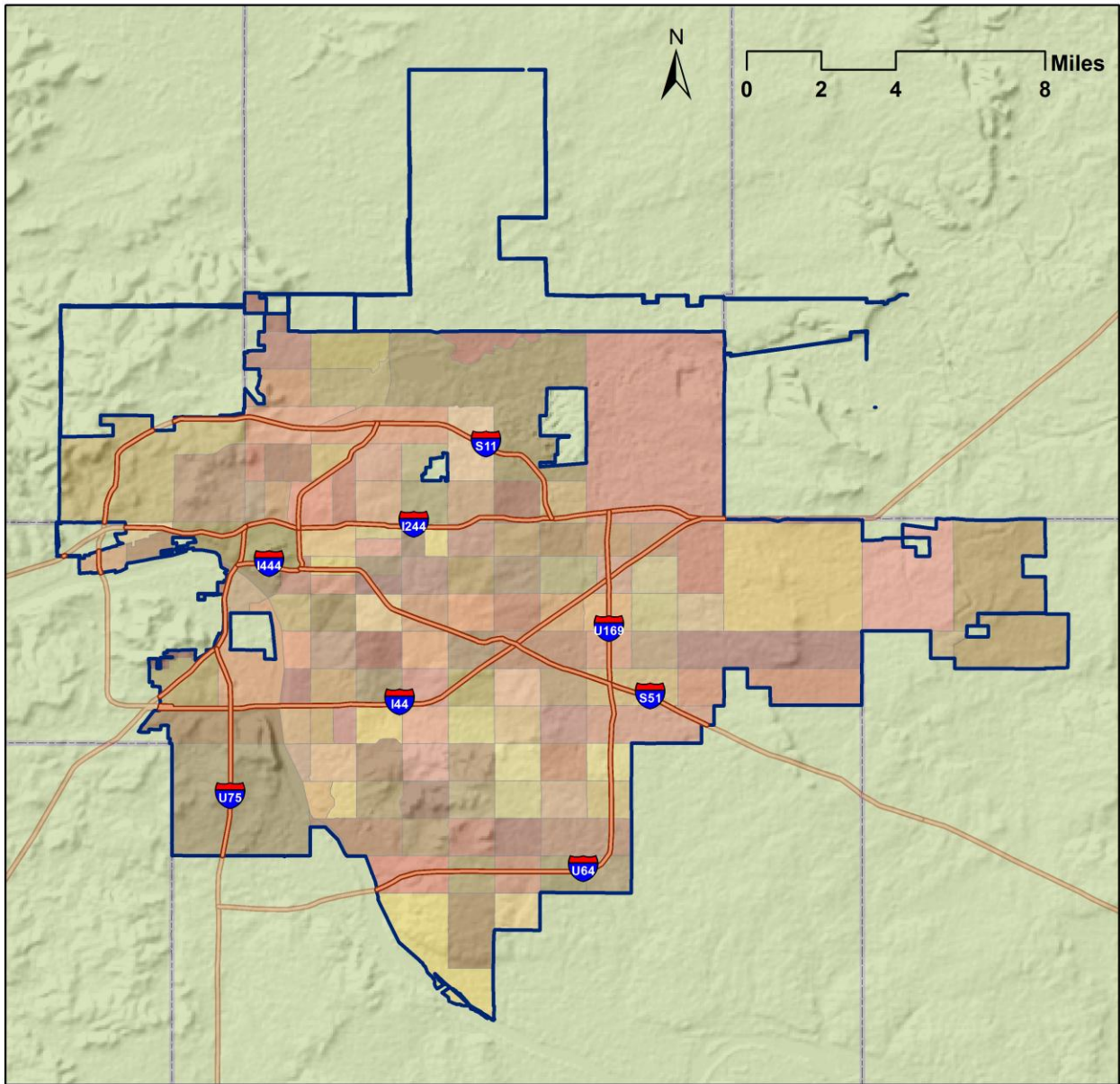
RESEARCH METHODOLOGY

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

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

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

Map I.1
City of Tulsa Study Area
City of Tulsa
2010 Census Bureau Data



Legend

City of Tulsa

-  Major Highways
-  City Limits
-  County Boundaries
-  Outside Study Area or No Data

Data Sources: US Census Bureau, US Geological Survey

Some baseline secondary and quantitative data were drawn from the Census Bureau, including 2000 and 2010 Census counts, as well as American Community Survey data averages from 2008 through 2012. Data from these sources detail population, personal income, poverty, housing units by tenure, cost burdens, and housing conditions. Other data were drawn from records provided by the Bureau of Labor Statistics, the Bureau of Economic Analysis, and a variety of other sources. The following narrative offers a brief description of other key data sources employed for the 2015 AI for the City of Tulsa.

Home Mortgage Disclosure Act Data

Home Mortgage Disclosure Act (HMDA) data were analyzed to examine possible fair housing issues in the home mortgage market. The HMDA was enacted by Congress in 1975 and has since been amended several times. It is intended to provide the public with loan data that can be used to determine whether financial institutions are serving the housing credit needs of their communities and to assist in identifying possible discriminatory lending patterns. HMDA requires lenders to publicly disclose the race, ethnicity, and sex of mortgage applicants, along with loan application amounts, household income, the Census tract in which the home is located, and information concerning prospective lender actions related to the loan application. Other pertinent information, such as the credit score of the applicant and prospective down payment amount, are not included in HMDA, so it is not possible to analyze all of the factors that bear on the decision to deny or approve a loan application. Nevertheless, these data do provide an index of the experience of individuals seeking a home purchase loan, and allow for a determination of whether the race or sex of an applicant is likely to impact the likelihood that he or she will be able to secure a loan.

For this analysis, HMDA data from 2004 through 2012 were analyzed, with the measurement of denial rates by Census tract and by race and ethnicity of applicants the key research objectives. These data were also examined to identify the groups and geographic areas most likely to encounter higher denial rates and receive loans with unusually high interest rates.

Fair Housing Complaint Data

Housing complaint data were used to analyze discrimination in the renting and selling of housing. HUD provided fair housing complaint data for the city from 2004 through 2013. This information included the basis, or protected class of the person lodging the complaint; the issue, or alleged discriminatory action; and the closure status of the alleged fair housing infraction, which relates to the result of the investigation. The review of fair housing complaints from within the city allowed for inspection of the tone, the relative degree and frequency of certain types of unfair housing practices, and the degree to which complaints were found to be with cause. The City of Tulsa Human Rights Bureau also provided data on 11 complaints it received from 2005 to 2013. Analysis of complaint data focused on determining which protected classes may have been disproportionately impacted by housing discrimination based on the number of complaints, while acknowledging that many individuals may be reluctant to step forward with a fair housing complaint for fear of retaliation or similar repercussion.

Fair Housing Survey

HUD recommends that surveys be conducted during the AI process to gain input for the public regarding perceived impediments to fair housing choice in an area. Accordingly, the city

elected to utilize a survey instrument as a means to encourage public input in the AI process. This step was a cost-effective and efficient method to utilize research resources.

The survey targeted individuals involved in the housing arena, although anyone was allowed to complete the survey. In addition to gathering data, this survey was utilized to help promote public involvement throughout the AI process. The 2015 City of Tulsa Fair Housing Survey, an internet-based instrument, has received 202 responses.

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

Federal, State, and Local Fair Housing Laws

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

Fair Housing Activities

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

Barriers to Fair Housing Choice in the Private Sector

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

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

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

Fair Housing in the Public Sector

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

- Land use policies,
- Zoning laws,
- Occupancy standards or health and safety codes,
- Property tax policies,
- Permitting processes,
- Housing construction standards,
- Neighborhood or community development policies, and
- Any other public administrative actions or regulations.

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

Additional Questions

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

Research Conclusions

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

PUBLIC INVOLVEMENT

This section discusses analysis of fair housing in the City of Tulsa as gathered from various public involvement efforts conducted as part of the AI process. Public involvement feedback is a valuable source of qualitative data about impediments, but, as with any data source, citizen comments alone do not necessarily indicate the existence of city-wide impediments to fair

⁷ "Not In My Backyard" mentality

housing choice. However, survey and forum comments that support findings from other parts of the analysis reinforce findings from other data sources concerning impediments to fair housing choice.

SECTION II. SOCIO-ECONOMIC CONTEXT

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

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

DEMOGRAPHICS

As part of the essential review of the background context of the City of Tulsa markets in which housing choices are made, detailed population and demographic data are included to describe the city’s residents. These data summarize not only the protected class populations, but characteristics of the total population for the entire city, entitlement cities, special focus areas, and the remainder of the city, as well as the outcome of housing location choices. These data help to address whether over-concentrations of racial and ethnic minorities exist, and if so, which areas of the city are most affected. Extreme concentrations of protected class populations do not necessarily imply impediments to fair housing choice, but may represent the results of impediments identified in other data.

POPULATION DYNAMICS

Table II.1 at right presents population counts in non-entitlement areas of the City of Tulsa, as drawn from the 2000 and 2010 Censuses and intercensal estimates for 2001 through 2009 and 2011 through 2013. In total, the population in the city grew from 393,049 persons in 2000 to an estimated 398,121 in 2013, an increase of 1.3 percent. However, intercensal estimates from 2011 to 2013 indicated that this growth is primarily attributable to rapid growth after 2005. In spite of this growth the population was observed to have contracted by 0.3 percent between the 2000 and 2010 Censuses.

Table II.1
Census and Intercensal
Population Estimates
City of Tulsa
2000, 2010 Census and
Intercensal Estimates

Year	Estimate
Census 2000	393,049
July 2001 Est.	391,773
July 2002 Est.	390,910
July 2003 Est.	387,595
July 2004 Est.	383,308
July 2005 Est.	381,967
July 2006 Est.	383,727
July 2007 Est.	385,779
July 2008 Est.	387,130
July 2009 Est.	390,339
Census 2010	391,906
July 2011 Est.	392,800
July 2012 Est.	394,349
July 2013 Est.	398,121
Change 00 – 13	1.3%

POPULATION BY AGE

As noted above, the population of the City of Tulsa fell by 0.3 percent between 2000 and 2010, as shown in Table II.2 below. The number of residents aged 35 to 54, which represented the largest share of Tulsans in both years, fell by over 10,000 persons. However, this reduction was offset by considerable growth in the number of residents aged 55 to 64, which grew by 38.8 percent over the decade. With the exception of these two groups, changes in the composition of the population were relatively minor with respect to age.

Table II.2
Population by Age

City of Tulsa
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	28,318	7.2%	29,479	7.5%	4.1%
5 to 19	80,766	20.5%	77,808	19.9%	-3.7%
20 to 24	31,286	8.0%	31,069	7.9%	-0.7%
25 to 34	58,659	14.9%	59,063	15.1%	0.7%
35 to 54	111,299	28.3%	100,925	25.8%	-9.3%
55 to 64	32,213	8.2%	44,723	11.4%	38.8%
65 or Older	50,508	12.9%	48,839	12.5%	-3.3%
Total	393,049	100.0%	391,906	100.0%	-0.3%

The elderly population, comprising residents over the age of 65, shrunk by 3.3 percent between 2000 and 2010, as shown in Table II.3 below. This overall drop was driven by reductions in the number of residents aged 67 to 79. By contrast, comparatively rapid growth was observed in the number of residents aged 65 to 66 and those over the age of 85, which grew by 21.2 and 16.5 percent, respectively. The number of Tulsans between the ages of 80 and 84 also grew, by 8.2 percent.

Table II.3
Elderly Population by Age

City of Tulsa
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	5,272	10.4%	6,392	13.1%	21.2%
67 to 69	7,864	15.6%	7,814	16.0%	-0.6%
70 to 74	12,846	25.4%	10,572	21.6%	-17.7%
75 to 79	11,180	22.1%	9,101	18.6%	-18.6%
80 to 84	7,076	14.0%	7,656	15.7%	8.2%
85 or Older	6,270	12.4%	7,304	15.0%	16.5%
Total	50,508	100.0%	48,839	100.0%	-3.3%

POPULATION BY RACE AND ETHNICITY

Changes in the population by race and ethnicity were more pronounced, as shown in Table II.4 on the following page. The white population declined by 11 percent; the only reduction in population size registered among all racial groups. Accordingly, white residents accounted for a smaller share of the total population in 2010 than they had in 2000. However, they still accounted for the largest share of all Tulsa residents at the end of the decade, or 62.6 percent. Meanwhile, the black and American Indian populations came to account for slightly larger shares of the population over the decade. In terms of ethnicity, the city experienced a marked

shift toward greater representation of Hispanic residents in the population, as this group nearly doubled in size and as a share of the population. Having accounted for 7.2 percent of the population in 2000, Hispanic residents came to represent 14.1 percent of the population over the decade. The share of non-Hispanic residents fell from 92.8 to 85.9 percent.

Table II.4
Population by Race and Ethnicity

City of Tulsa
2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	275,488	70.1%	245,309	62.6%	-11.0%
Black	60,794	15.5%	62,164	15.9%	2.3%
American Indian	18,551	4.7%	20,817	5.3%	12.2%
Asian	7,150	1.8%	9,077	2.3%	27.0%
Native Hawaiian/ Pacific Islander	202	0.1%	316	0.1%	56.4%
Other	13,564	3.5%	31,219	8.0%	130.2%
Two or More Races	17,300	4.4%	23,004	5.9%	33.0%
Total	393,049	100.0%	391,906	100.0%	-0.3%
Non-Hispanic	364,938	92.8%	336,640	85.9%	-7.8%
Hispanic	28,111	7.2%	55,266	14.1%	96.6%

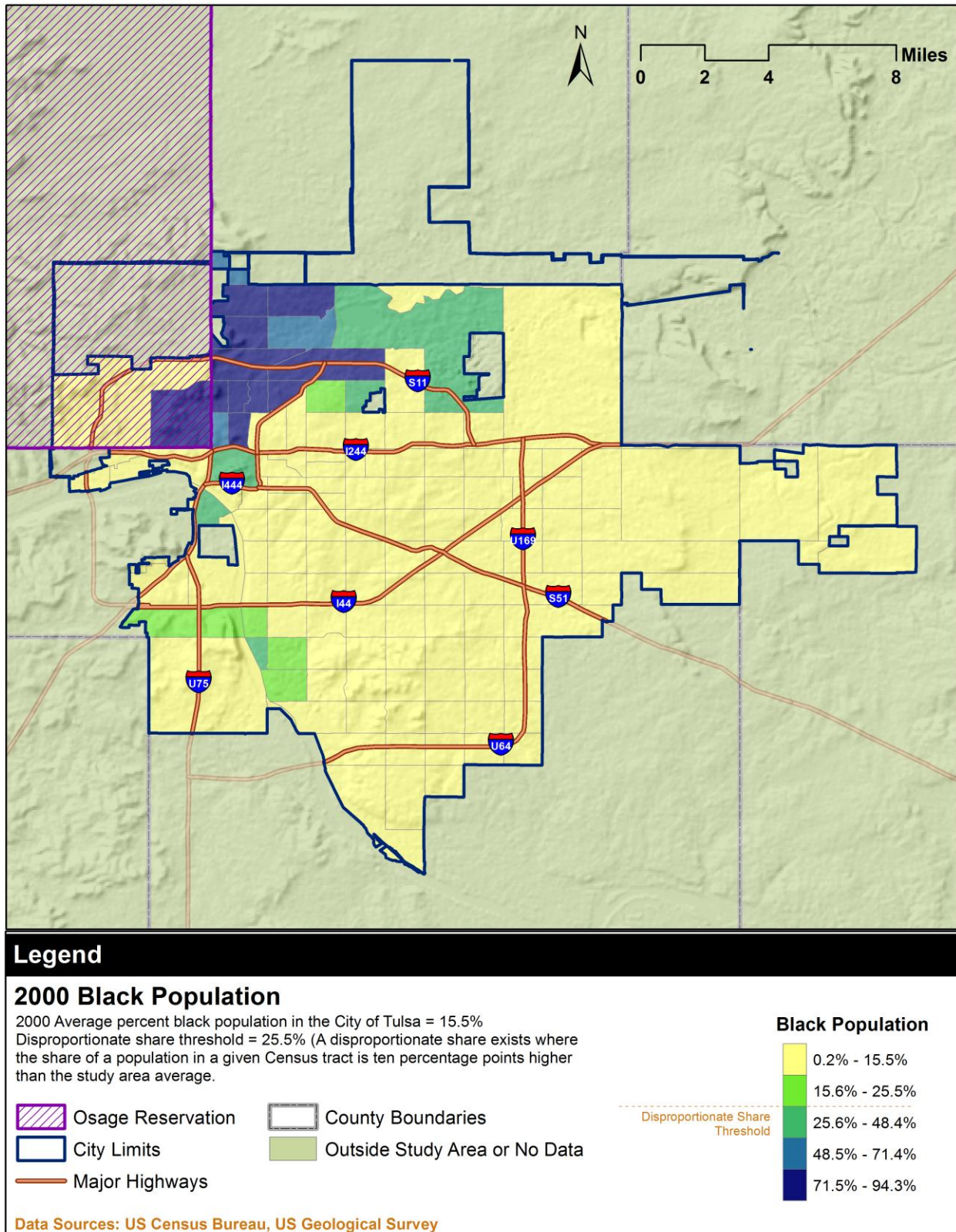
The geographic distribution of racial and ethnic minorities can vary significantly throughout a community. The U.S. Department of Housing and Urban Development (HUD) has determined that an area demonstrates a disproportionate share of a population when the percentage of that population is 10 percentage points or more above the study area average. For example, the black population in the City of Tulsa represented 15.5 percent of the total population in 2000. Therefore, any Census tract in the city in which black residents accounted for more than 25.5 percent of the population was considered to hold a disproportionate share of that population.

In fact, there were several Census tracts that held disproportionate shares of black residents in 2000, as shown in Map II.1 on the following page. The highest concentration of black residents was observed in the Census tract encompassing the neighborhood of Lacy Park, where 94.3 percent of residents in 2000 were black. More than three-quarters of residents were black in most Census tracts to the north and northwest of the city center; tracts with concentrations of black residents this high were located exclusively in that area. Lower, though still disproportionate, concentrations of black residents were observed in the city center, across the river from the city center, in St. Thomas Square and Inhofe, and in north, central Census tracts near the Acme Brick Company and the Airport.

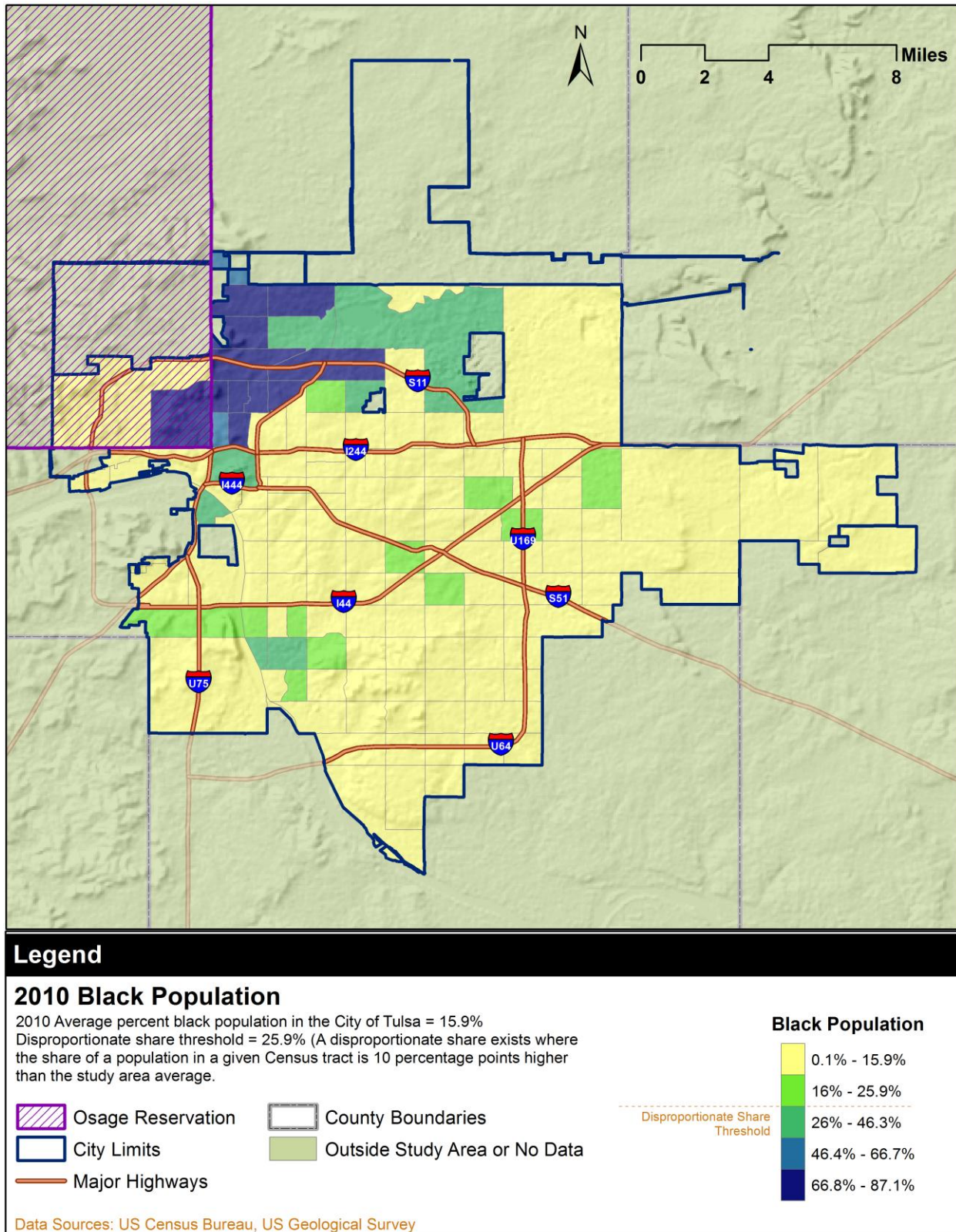
All areas in which black residents were disproportionately concentrated in 2000 retained disproportionate shares of black residents in 2010, as shown in Map II.2 on page 25. However, the highest concentration of black residents observed in any Census tract was 87.1 percent, over seven percentage points lower than the highest concentration observed in 2000.

In 2000, 7.2 percent of the population of Tulsa was Hispanic, but Hispanic residents made up as much as a third of the population in Census tracts to the east and northeast of the city center, as shown in Map II.3 on page 26. Tracts with lower, though still disproportionate concentrations tended to be located in this same area, though there were Census tracts with disproportionate shares of Hispanic residents as far east as Highway 169, where more than a quarter of residents were Hispanic.

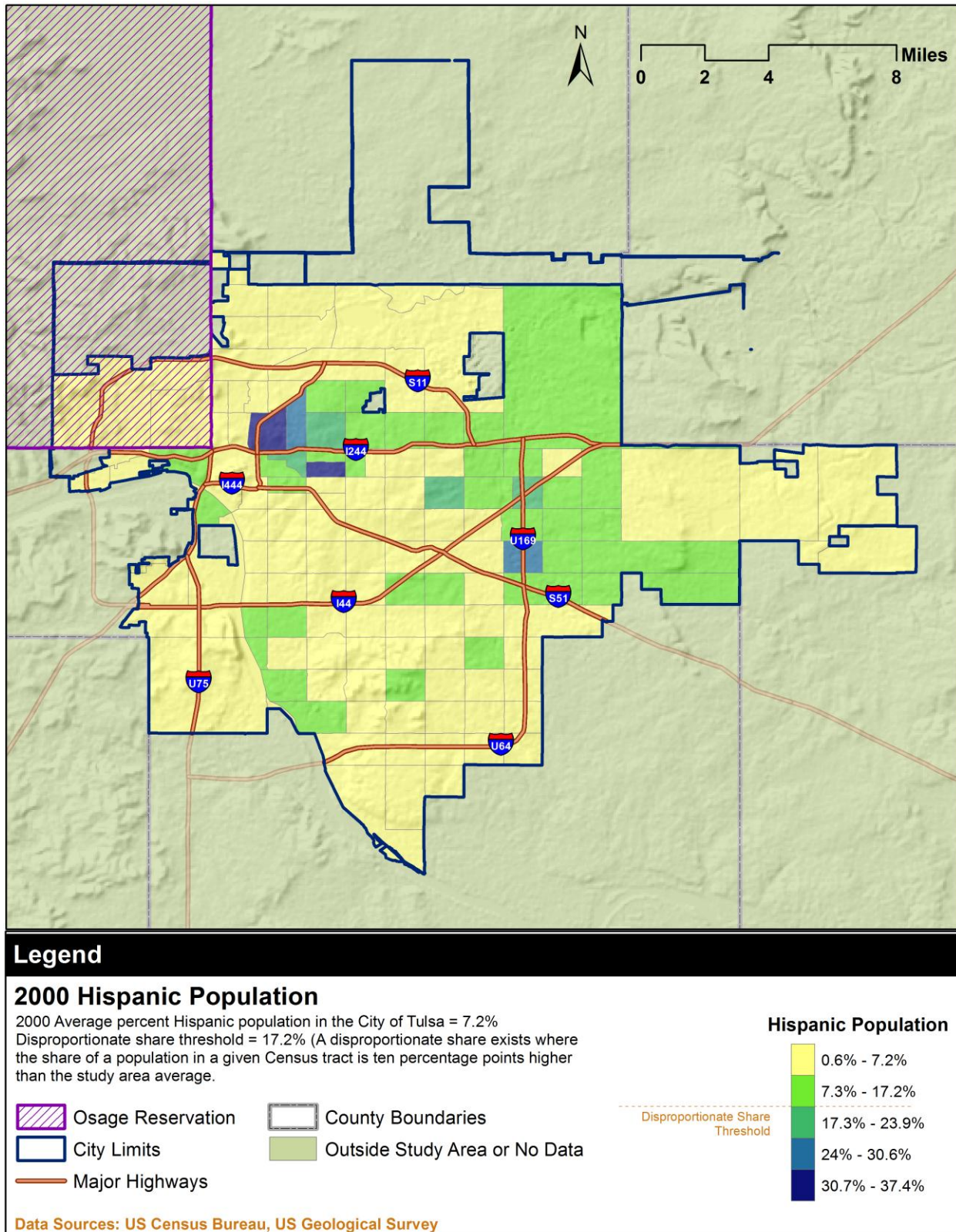
Map II.1
Black Population by Census Tract
 City of Tulsa
 2000 Census Data



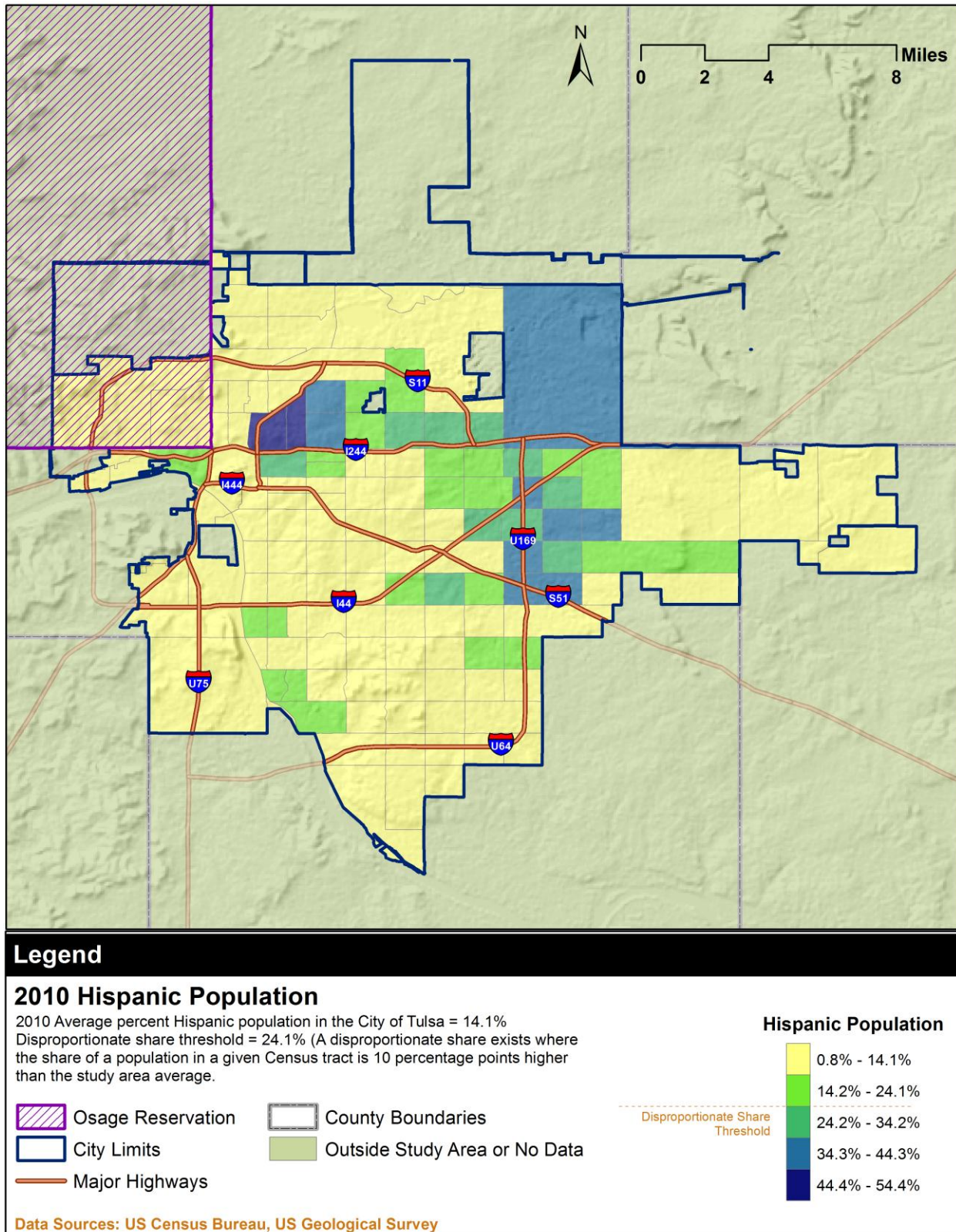
Map II.2
Black Population by Census Tract
 City of Tulsa
 2010 Census Data



Map II.3
Hispanic Population by Census Tract
 City of Tulsa
 2000 Census Data



Map II.4
Percent Hispanic Population by Census Tract
 City of Tulsa
 2010 Census Data



By 2010, Hispanic residents had nearly doubled as a percentage of the city population, accounting for 14.1 percent of all Tulsa residents. As shown in Map II.4 on the previous page, areas that had shown disproportionate concentrations of Hispanic residents in 2000 continued to have disproportionate shares of Hispanic residents in 2010. However, the share of Hispanic residents had grown considerably in two Census tracts to the northeast of the city center. In the tract encompassing the neighborhood of Crutchfield more than half of the population was Hispanic; to the immediate east, more than 47 percent. Overall, there were more tracts with disproportionate shares of Hispanic residents in 2010 than in 2000, and the concentration of Hispanic residents in those tracts had risen.

DISABILITY STATUS

The Census Bureau defines disability as a lasting physical, mental, or emotional condition that makes it difficult for a person to conduct daily activities of living or impedes him or her from being able to go outside the home alone or to work. In 2000, 20.5 percent of the population of Tulsa was living with some form of disability, as shown in Table II.5 below. This figure included 4,113 children between the age of 5 and 15, and 19,896 over the age of 65. In 2012, the disability rate in Tulsa was 14.8 percent, as shown in Table II.6 below. However, due to changes in the ACS questionnaire that were implemented in 2008, figures with 2012 are not directly comparable with figures from 2000.

Table II.5
Disability by Age
City of Tulsa
2000 Census SF3 Data

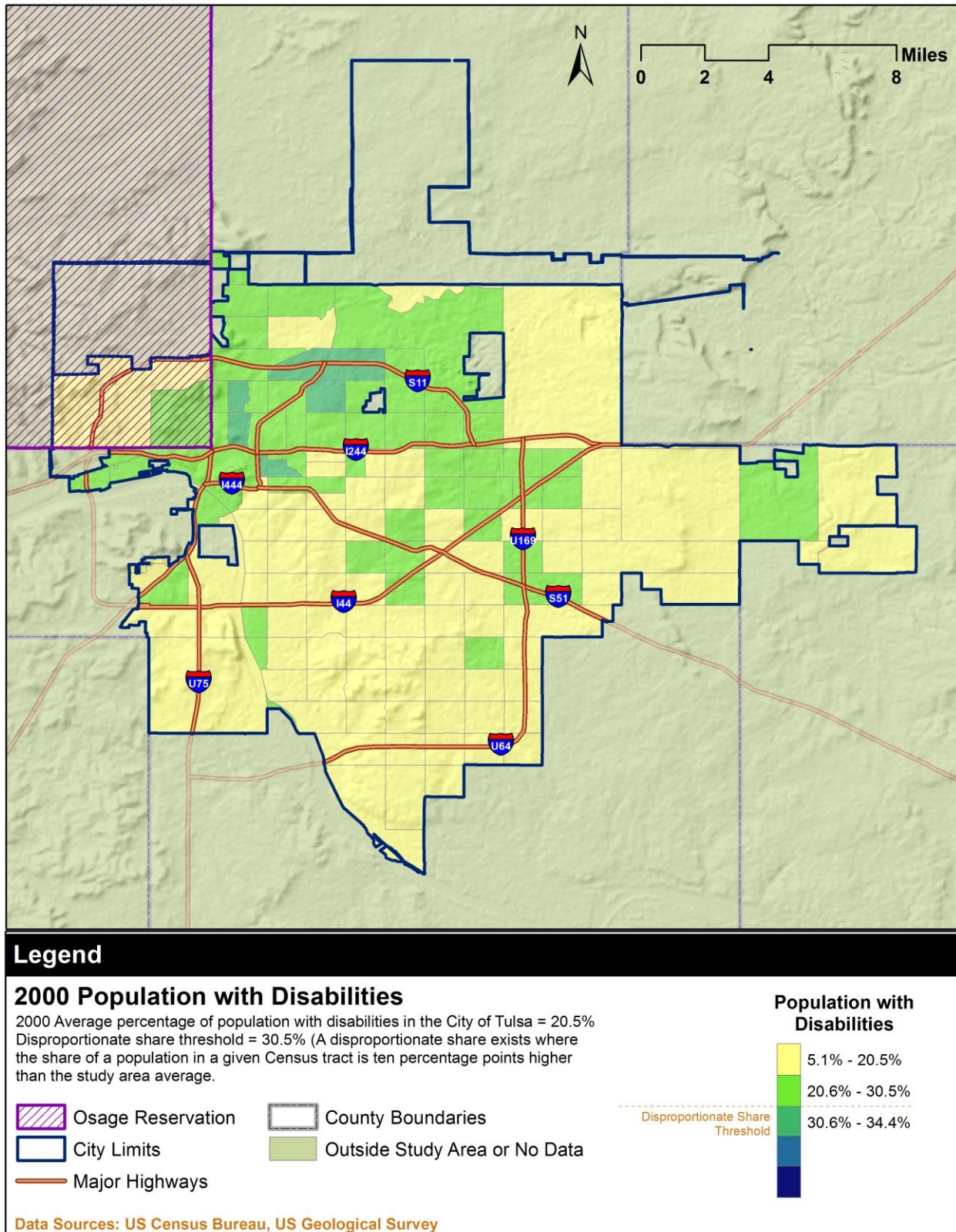
Age	Total	
	Disabled Population	Disability Rate
5 to 15	4,113	7.1%
16 to 64	49,830	19.6%
65 and older	19,896	41.7%
Total	73,839	20.5%

Table II.6
Disability by Age
City of Tulsa
2012 Five-Year ACS Data

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	206	1.4%	156	1.1%	362	1.2%
5 to 17	2,986	8.9%	1,753	5.4%	4,739	7.2%
18 to 34	4,045	8.2%	3,983	7.9%	8,028	8.1%
35 to 64	12,050	17.3%	13,275	17.7%	25,325	17.5%
65 to 74	3,306	29.7%	3,934	28.3%	7,240	28.9%
75 or Older	4,267	49.9%	7,348	51.6%	11,615	51.0%
Total	26,860	14.4%	30,449	15.2%	57,309	14.8%

Residents with disabilities tended to live in Census tracts to the north of Interstate 244 in 2000, as shown in Map II.5 on the following page. In that year, 20.5 percent of Tulsa residents were living with some form of disability, making the disproportionate share threshold 30.5 percent. Several tracts held disproportionate shares of residents with disabilities; all but one lay to the north and northeast of the city center; the other Census tract lay to the immediate east of the city center.

Map II.5
Disabled Population by Census Tract
 City of Tulsa
 2000 Census Data



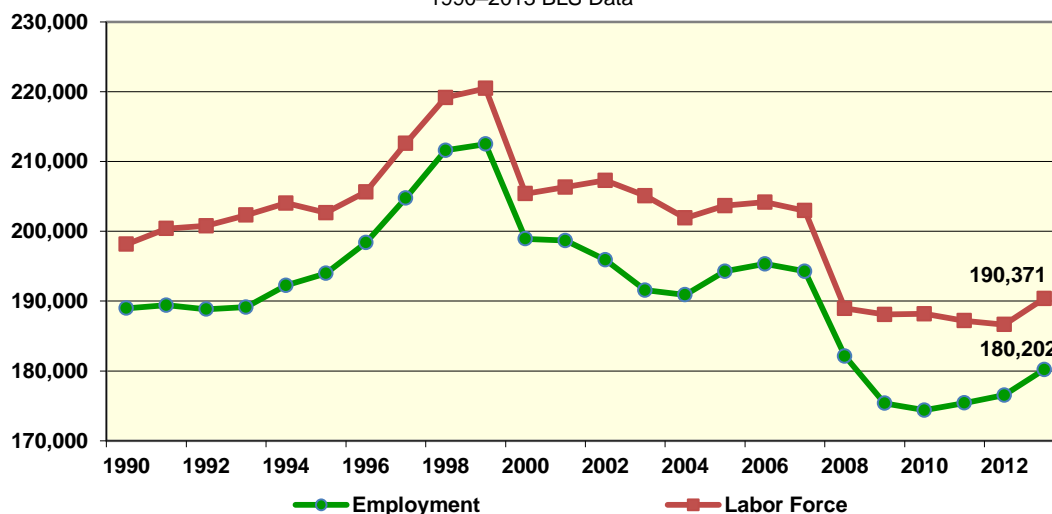
ECONOMICS

Data indicating the size and dynamics of the City of Tulsa's job markets, workforce, incomes, and persons in poverty provide essential contextual background and indicate the potential buying power or other limitations of city residents when making a housing choice. A review of the city's residents in such a context shows where additional attention may be needed to address needs and challenges.

LABOR FORCE AND EMPLOYMENT

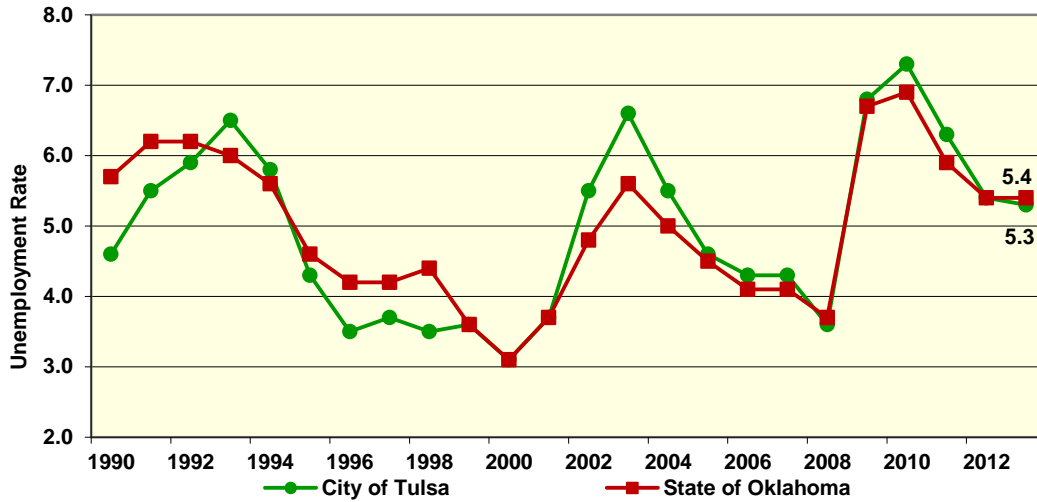
Data regarding the labor force, defined as the total number of persons working or looking for work, are gathered by the Bureau of Labor Statistics (BLS). The size of the labor force in the city has been subject to considerable fluctuation over the last decade, as shown in Diagram II.1 below. However, the overall trend since 1999 has been downward: in 2000, the number of people in the labor force fell by around 15,000 over the previous year, as did the number of employed. The number of employed persons continued to fall, though at a slower rate, for the next four years. The labor market of Tulsa enjoyed a moderate, though brief, recovery from 2004 through 2006 as the number of employed began to rise and the size of the labor force held relatively steady. However, the labor force and number of employed both fell sharply after 2007, and the number of employed continued to fall through the following year. By 2010, the number of employed persons in the city had fallen to 174,376, a twenty-year low. However, since that time, the labor market has shown steady growth.

Diagram II.1
Employment and Labor Force
City of Tulsa
1990–2013 BLS Data



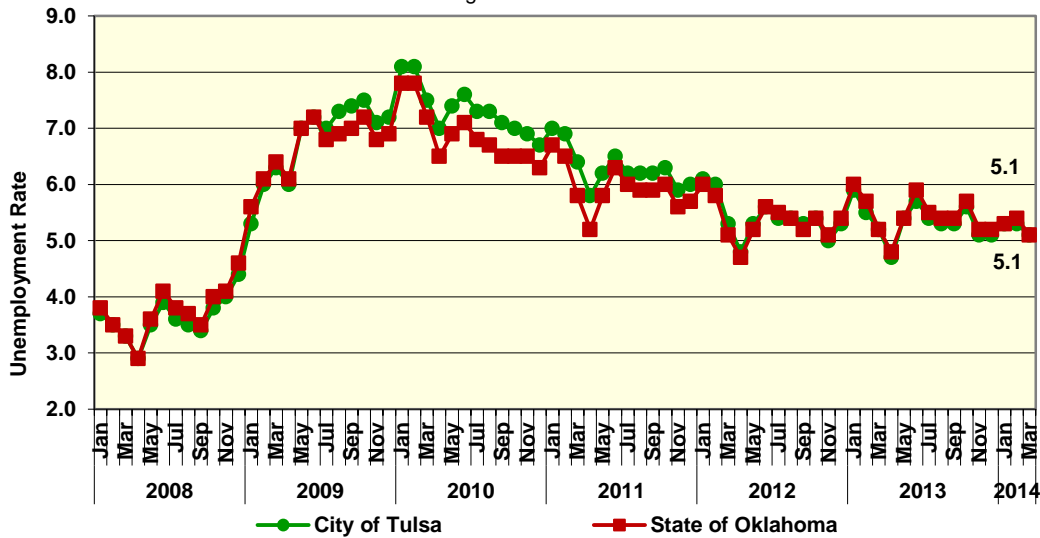
The unemployment rate in the city has also fluctuated considerably since 1990, as shown in Diagram II.2 on the following page. The unemployment rate, which can be understood as the difference between the number of persons in the labor force and the number employed, has peaked three times since 1990; in 1993, 2003, and 2010. The most recent peak, which corresponded to the global recession of the late 2000s, came in 2009 as the number of employed fell sharply and the size of the labor force held relatively steady. Since 2010, growth in the labor force has driven the unemployment rate down. In 2013, the unemployment rates in Tulsa and the State of Oklahoma stood at 5.3 and 5.4 percent respectively.

Diagram II.2
Unemployment Rate
 City of Tulsa
 1990–2013 BLS Data



Monthly unemployment figures reveal that the most recent upswing in unemployment began late in 2008 and continued through the beginning of 2010, as shown in Diagram II.3 below. With the exception of the period from September 2008 through March 2009, the unemployment rate showed substantial seasonal variation, generally peaking in the winter and early summer.

Diagram II.3
Monthly Unemployment Rate
 City of Tulsa
 2008–August 2013 BLS Data

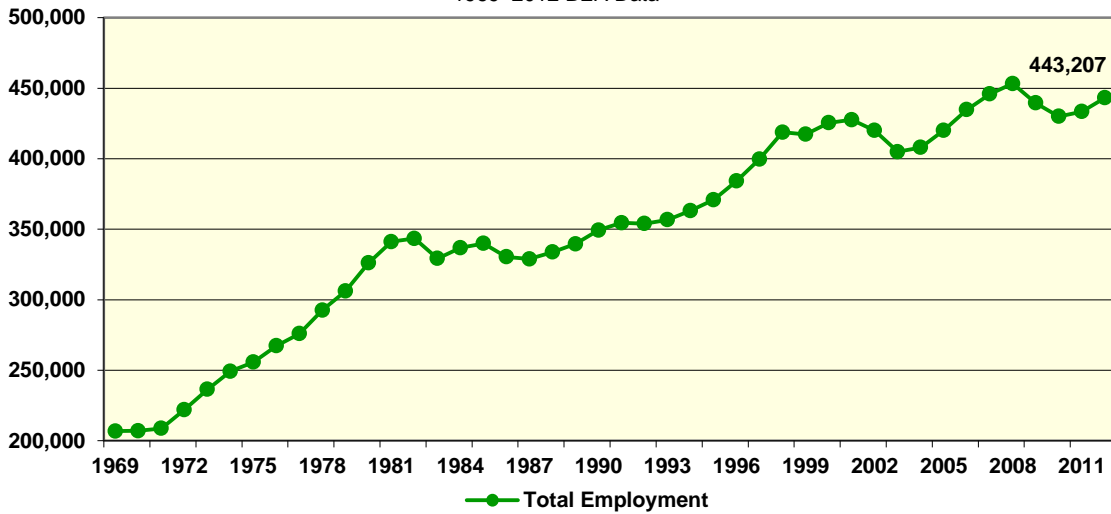


FULL- AND PART-TIME EMPLOYMENT AND EARNINGS

Full employment, as measured by the Bureau of Economic Analysis, refers to the total number of part-time and full-time jobs in Tulsa County. These data differ from BLS data, notably in that the same worker may be counted twice, since one person may work more than one job. According to these figures, growth in the total number of jobs was steady throughout most of the 1990s, though 2001, as shown in Diagram II.4 on the following page. Following the latter

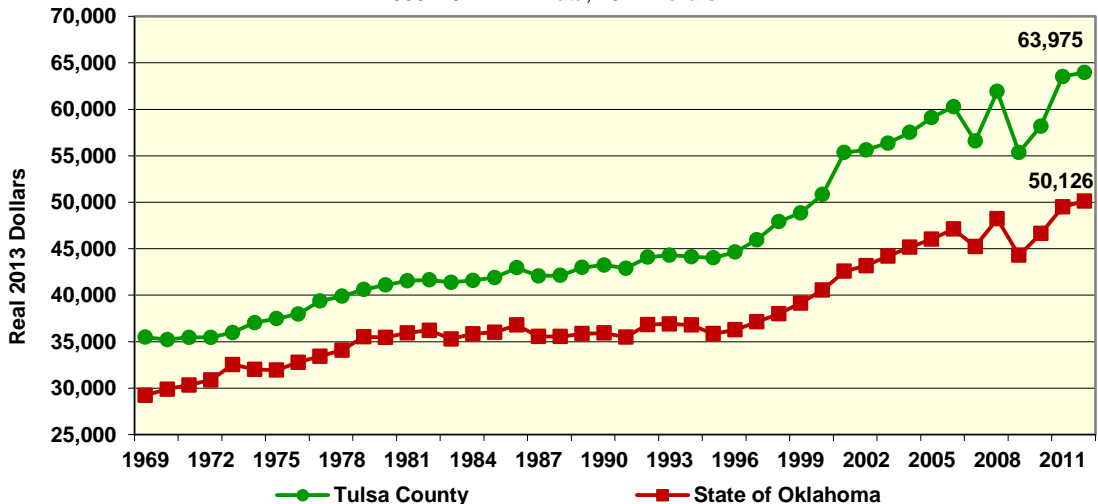
year, full employment fell for two years before entering another period of steady growth that began in 2003 and continued through 2008. Following that year, the total number of jobs fell by around 19,000. As had been the case in data collected by the BLS, the total number of jobs, as measured by BEA data, began to increase after 2010. By 2012, the total number of jobs stood at 572,138.

Diagram II.4
Full- and Part-Time Employment
 Tulsa County
 1969–2012 BEA Data

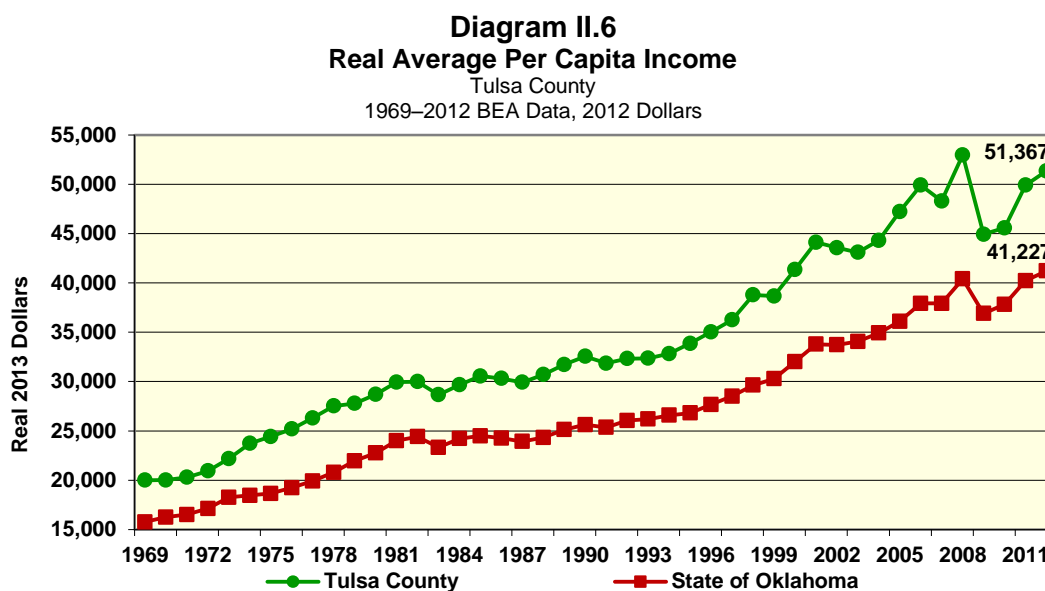


Growth in real average earnings per job was also steady throughout the nineties, and continued to climb even as the total number of jobs fell after 2001, as shown in Diagram II.5 below. Real average earning per job represents the total amount earned at all jobs in Tulsa County, divided by the number of jobs and adjusted for inflation. By 2006, the average job in the city paid \$60,291 in real dollars. Earnings fluctuated considerably over the following three years, falling to around \$55,000 by 2009. Growth has been relatively steady since then, and real average earnings in the city stood at just under \$64,000 in 2012.

Diagram II.5
Real Average Earnings Per Job
 Tulsa County
 1969–2012 BEA Data, 2012 Dollars



Growth in real per capita income (PCI) was less steady in the period leading up to 2006, as shown in Diagram II.6 below. Real PCI represents the total income earned in the county, divided by the number of residents. After a decade of steady growth, real PCI fell by nearly \$1,000 between 2001 and 2003. However, growth in PCI rebounded in 2004 and continued through 2006. As had been the case with real average earnings, real PCI fluctuated over the period from 2006 through 2009, though the fluctuation in PCI was less pronounced. Having fallen below \$45,000 in 2009, PCI began to grow again in 2010 and continued through 2012, when PCI in the county stood at \$51,367.



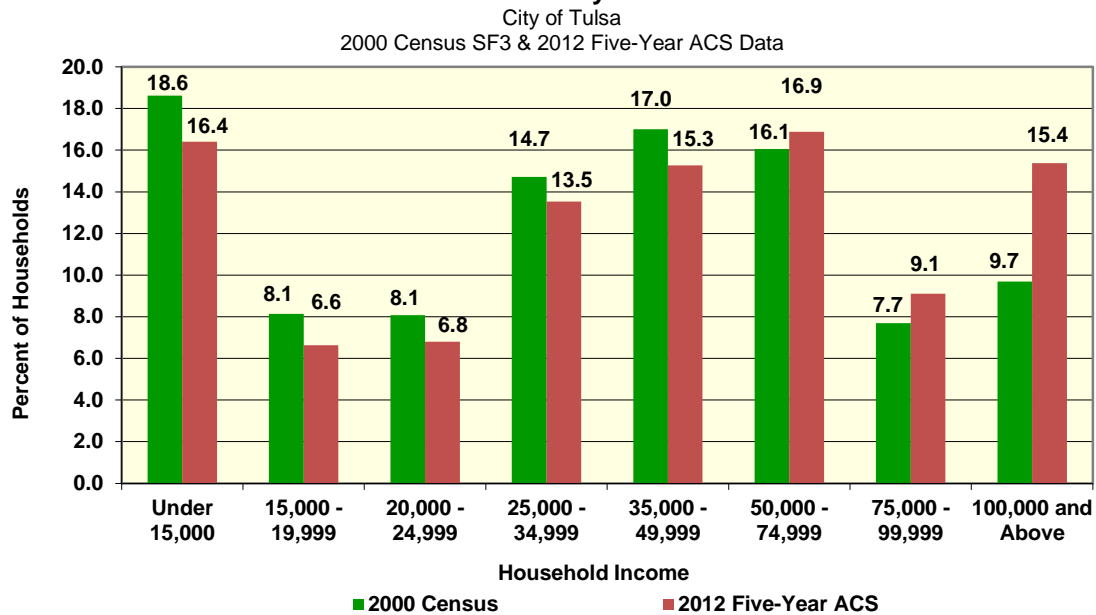
HOUSEHOLD INCOME

Despite the considerable fluctuation in earnings and income toward the end of the last decade, real PCI in the city was higher in 2008-2012 than it had been in 2000. This is reflected in the shift toward higher household incomes, in current dollars, since 2000, as shown in Table II.7 below. Between 2000 and 2008-2012, the share of households making less than \$50,000 per year fell, while the share of households making more than \$50,000 correspondingly grew. The shift toward higher household incomes after 2000 is portrayed graphically in Diagram II.7 on the following page.

Table II.7
Households by Income
 City of Tulsa
 2000 Census SF3 & 2012 Five-Year ACS Data

Income	2000 Census		2012 Five-Year ACS	
	Households	% of Total	Households	% of Total
Less than \$15,000	30,893	18.6%	26,886	16.4%
\$15,000 to \$19,999	13,491	8.1%	10,881	6.6%
\$20,000 to \$24,999	13,395	8.1%	11,144	6.8%
\$25,000 to \$34,999	24,407	14.7%	22,178	13.5%
\$35,000 to \$49,999	28,203	17.0%	25,021	15.3%
\$50,000 to \$74,999	26,638	16.1%	27,664	16.9%
\$75,000 to \$99,999	12,766	7.7%	14,923	9.1%
\$100,000 or More	16,088	9.7%	25,217	15.4%
Total	165,881	100.0%	163,914	100.0%

Diagram II.7
Households by Income



POVERTY

The Census Bureau uses a set of income thresholds that vary by family size and composition to determine poverty status. If a family’s total income is less than the threshold for its size, then that family, and every individual in it, is considered poor. The poverty thresholds do not vary geographically, but they are updated annually for inflation using the Consumer Price Index. The official poverty definition counts income before taxes and does not include capital gains and non-cash benefits such as public housing, Medicaid, and food stamps. Over 54,000 residents of Tulsa were living below the poverty line in the year 2000, accounting for 14.1 percent of the population, as shown in Table II.8 below. By 2012, the poverty rate had grown to 19.7 percent, and an estimated 75,636 Tulsans were living in poverty.

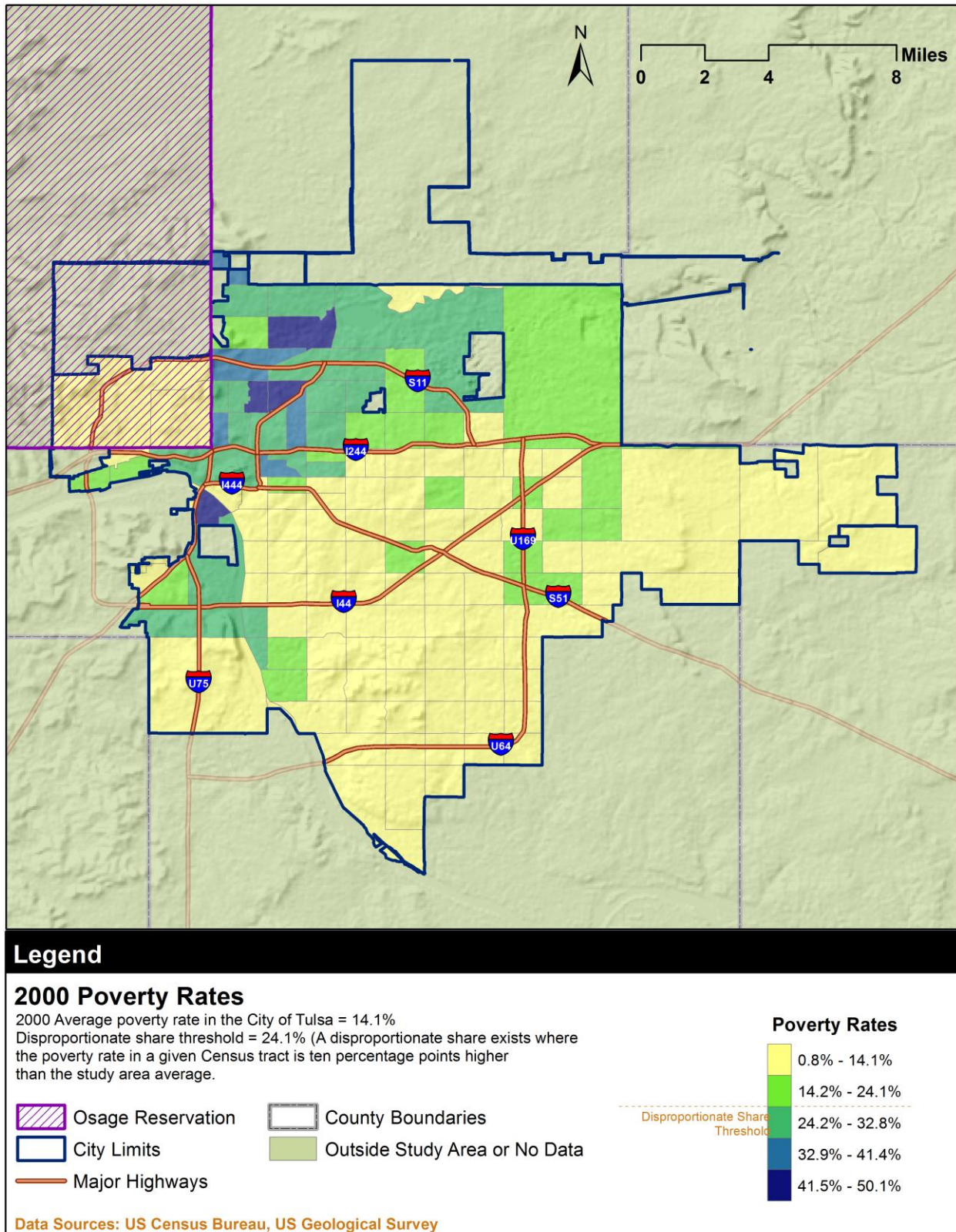
Table II.8
Poverty by Age

City of Tulsa
2000 Census SF3 & 2012 Five-Year ACS Data

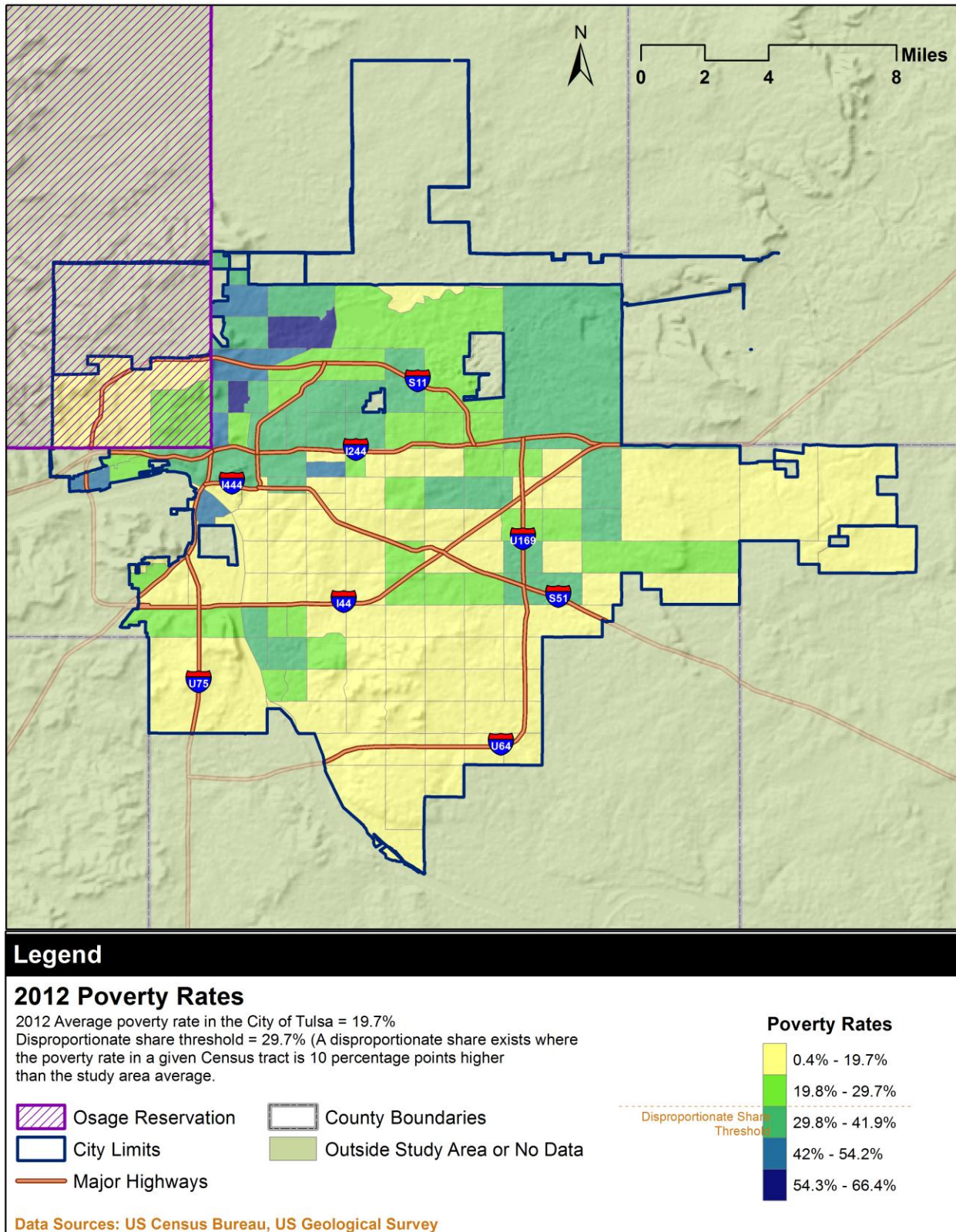
Age	2000 Census		2012 Five-Year ACS	
	Persons in Poverty	% of Total	Persons in Poverty	% of Total
Under 6	7,911	14.6%	11,724	15.5%
6 to 17	11,990	22.2%	17,159	22.7%
18 to 64	30,252	55.9%	42,094	55.7%
65 or Older	3,968	7.3%	4,659	6.2%
Total	54,121	100.0%	75,636	100.0%
Poverty Rate	14.1%	.	19.7%	.

Concentrations of households in poverty in the year 2000 are presented in Map II.6 on the following page. As shown, areas with relatively high concentrations of poverty tended to be located to the north and northeast of the city center, as well as in the city center itself. More than a quarter the population was living in poverty in most of these areas, and in some Census tracts as much as half of the population lived in poverty. Note that areas with disproportionate concentrations of households in poverty were largely located in areas with relatively high proportions of black and Hispanic residents.

Map II.6
Poverty Rate by Census Tract
 City of Tulsa
 2000 Census Data



Map II.7
Poverty Rate by Census Tract
 City of Tulsa
 2012 Five-Year ACS Data



This same tendency held true in the 2008-2012 ACS, as shown in Map II.7 on the previous page. Though there were some minor shifts in the distribution of poverty between 2000 and 2012, areas with relatively high rates of poverty still tended to be located in the north of the city, and still in areas with high concentrations of racial and ethnic minority residents, as well as residents with disabilities.

HOUSING

Simple counts of housing by age, type, tenure, and other characteristics form the basis for the housing stock background, suggesting the available housing in the city from which residents have to choose. Examination of households, on the other hand, shows how residents use the available housing, and shows household size and housing problems such as incomplete plumbing and/or kitchen facilities. Review of housing costs reveals the markets in which housing consumers in the city can shop, and may suggest needs for certain populations.

CHARACTERISTICS OF THE HOUSING STOCK

The housing stock in the City of Tulsa grew by 3.19 percent between the 2000 and 2010 Censuses. Given that the city's population fell by 0.3 percentage points during the same period, the number of housing units grew faster than the number of residents to fill those housing units.

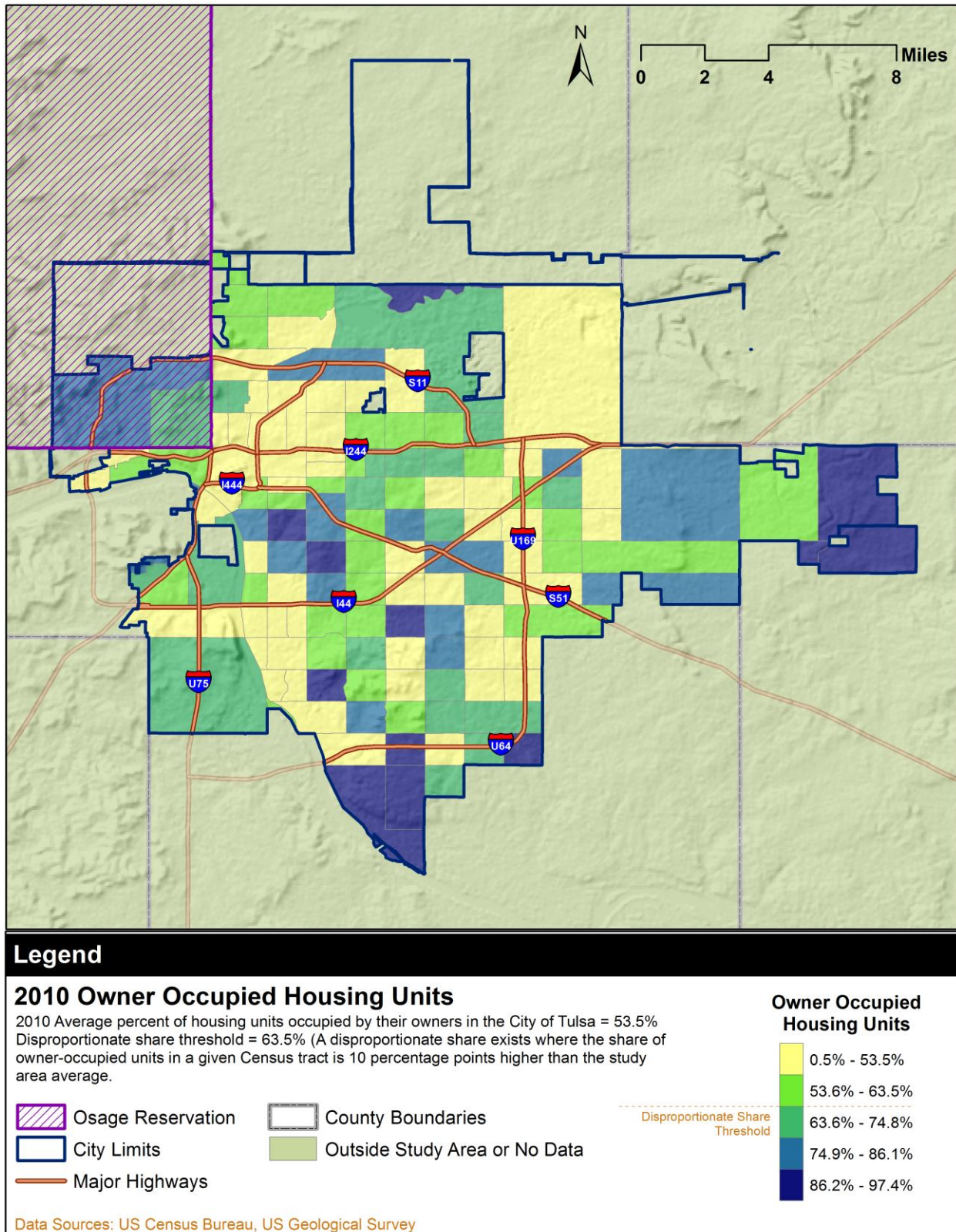
The number of occupied housing units fell by 1.1 percent during this same time period, as shown in Table II.9 below. This reduction was due to a decrease in the number of owner-occupied units in the city; the number of renter-occupied units actually grew by 3.6 percent. As a result, renter-occupied units, which had accounted for 44.4 percent of all occupied housing units in 2000, came to account for 46.5 percent by 2010. However, a more dramatic increase was observed in the number of vacant housing units in the city. These units grew as a share of the total housing stock by 54.8 percent, and represented 11.4 percent of all housing units in 2010.

Table II.9
Housing Units by Tenure
City of Tulsa
2000 & 2010 Census SF1 Data

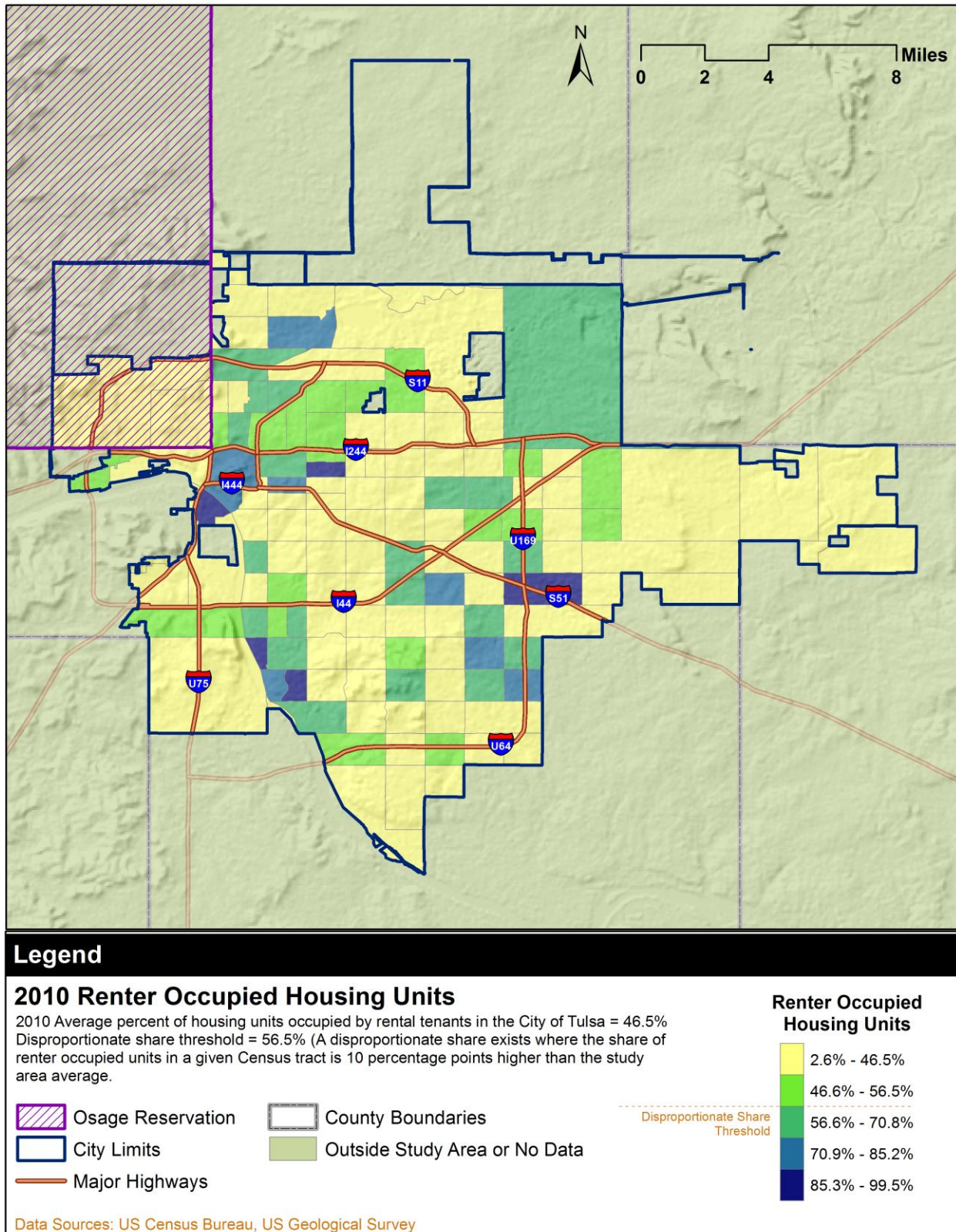
Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	165,743	92.4%	163,975	88.6%	-1.1%
Owner-Occupied	92,234	55.6%	87,787	53.5%	-4.8%
Renter-Occupied	73,509	44.4%	76,188	46.5%	3.6%
Vacant Housing Units	13,662	7.6%	21,152	11.4%	54.8%
Total Housing Units	179,405	100.0%	185,127	100.0%	3.19%

The geographic distribution of owner-occupied units in the City of Tulsa in 2010 is presented on the following page in Map II.8. Though these units appeared in above-average and disproportionate concentrations in Census tracts throughout the City, they tended to be clustered to the southeast of the city center. The highest concentrations of owner-occupied housing units were observed in the area to the south of the Creek Turnpike and to the northeast of the Arkansas River. In those areas, as much as 97.4 percent of housing units were owner-occupied.

Map II.8
Owner-Occupied Housing Units
 City of Tulsa
 2010 Census Data



Map II.9
Renter-Occupied Housing Units
 City of Tulsa
 2010 Census Data



By contrast, renter-occupied units tended to be disproportionately concentrated in and around the city center and along the Arkansas River between Interstate 44 and the Creek Turnpike, as shown in Map II.9 on the previous page. The highest concentration of renter-occupied units was observed in the Census tract to the northwest of Oral Roberts University, where 99.5 percent of housing units were occupied by renters.

Vacant housing units also tended to be concentrated in areas with disproportionate concentrations of black or Hispanic residents, as shown in Map II.10 on the following page. However, the highest concentrations of vacant units were observed in the large, rural tract to the immediate east of the airport and the tract surrounding the Holly Frontier oil refinery across the river from the city center. In these areas, as much as 31.3 percent of housing units were vacant.

VACANT HOUSING

The number of vacant units grew by nearly 7,500 units between 2000 and 2010 as shown in Table II.10 below. This represents a growth rate of 54.8 percent. The number of units for sale grew at a higher rate, and these units came to account for a higher share of vacant units over the decade. However, vacant units classified as “other vacant” grew at the highest rate, nearly doubling in number. These units accounted for 30.8 percent of vacant units in 2010.

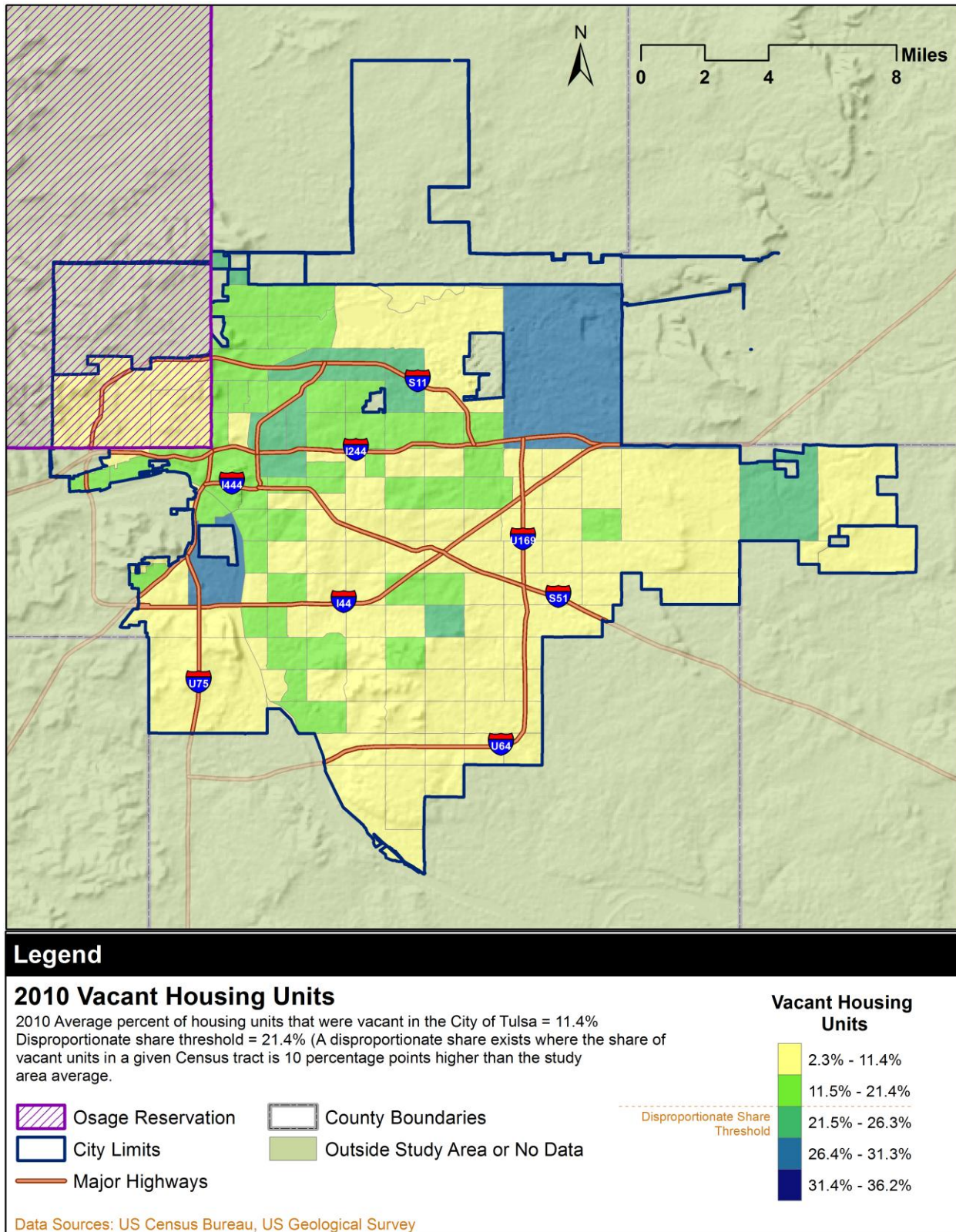
Table II.10
Disposition of Vacant Housing Units
City of Tulsa
2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00–10
	Units	% of Total	Units	% of Total	
For Rent	6,964	51.0%	10,238	48.4%	47.0%
For Sale	1,497	11.0%	2,445	11.6%	63.3%
Rented or Sold, Not Occupied	867	6.3%	1,120	5.3%	29.2%
For Seasonal, Recreational, or Occasional Use	894	6.5%	833	3.9%	-6.8%
For Migrant Workers	38	0.3%	10	0.0%	-73.7%
Other Vacant	3,402	24.9%	6,506	30.8%	91.2%
Total	13,662	100.0%	21,152	100.0%	54.8%

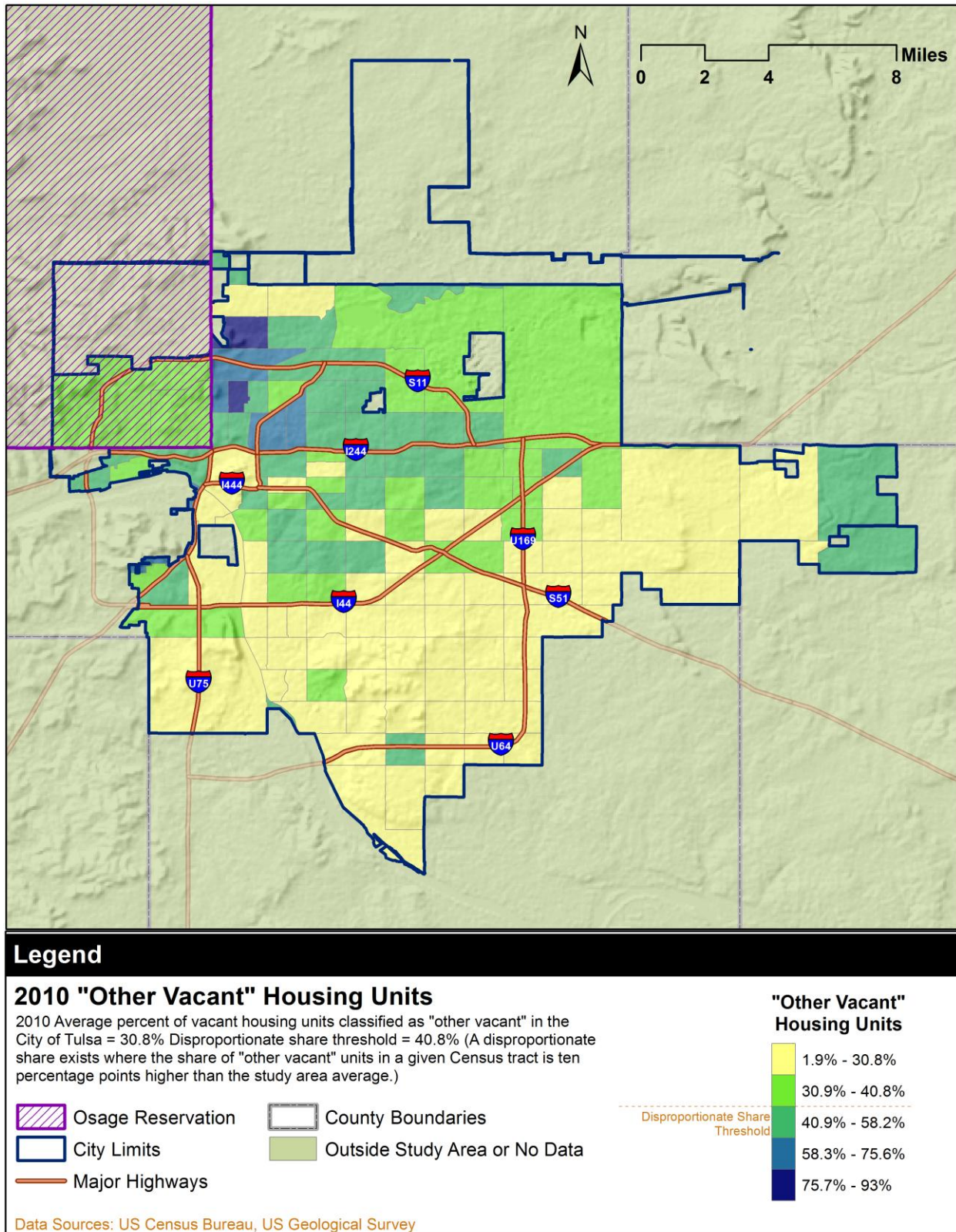
While high numbers of vacant units can be problematic, there are many reasons that housing units may be unoccupied, and vacancies can be temporary. However, units classified as “other vacant” are a greater cause for concern, as these units are not on the housing market, it is not often clear who owns them, and thus they are more likely to fall into dilapidation than other types of vacant units. On that count, the relatively rapid pace at which these units increased in number between the two Censuses, 91.2 percent over the decade, is troubling, and blight is a concern in any areas in which such units were observed to be disproportionately concentrated.

In fact, there were several areas in City of Tulsa that held disproportionate shares of “other vacant” units in 2010, as shown in Map II.11 on page 42. In two of these areas, represented in dark blue, more than three-quarters of vacant units were “other vacant” units. Blight is a concern in these areas, as well as in other Census tracts with high concentrations of “other vacant” units, and in which such units may be grouped in close physical proximity. These units tended strongly to be concentrated in areas with high concentrations of black and Hispanic residents.

Map II.10
Vacant Housing Units
 City of Tulsa
 2010 Census Data



Map II.11
“Other Vacant” Housing Units
 City of Tulsa
 2010 Census Data



HOUSEHOLD SIZE

The size of the average household changed slightly between the 2000 and 2010 Censuses, as shown in Table II.11 below. As the number of occupied housing units declined overall, the number of households with five and six members grew by 6.8 and 21.1 percent, respectively, and the number of households with seven members or more grew by 34.2 percent. Smaller households declined in number, with the exception of one-person households, which increased by 0.7 percent.

Table II.11
Households by Household Size
 City of Tulsa
 2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
One Person	56,184	33.9%	56,551	34.5%	.7%
Two Persons	54,280	32.7%	52,331	31.9%	-3.6%
Three Persons	24,234	14.6%	23,265	14.2%	-4.0%
Four Persons	18,110	10.9%	17,083	10.4%	-5.7%
Five Persons	8,106	4.9%	8,661	5.3%	6.8%
Six Persons	3,029	1.8%	3,669	2.2%	21.1%
Seven Persons or More	1,800	1.1%	2,415	1.5%	34.2%
Total	165,743	100.0%	163,975	100.0%	-1.1%

Table II.12 below presents a portrait of the housing stock in the city in 2000 and 2012, segmented by housing type. Single-family units constituted the most prevalent housing type in both time periods, accounting for 65.5 percent of all housing units in 2000 and 66.3 percent of housing units in 2012, an increase of 0.8 percentage points.

Table II.12
Housing Units by Type
 City of Tulsa

2000 Census SF3 & 2012 Five-Year ACS Data

Unit Type	2000 Census		2012 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	117,600	65.5%	123,496	66.3%
Duplex	3,876	2.2%	3,649	2.0%
Tri- or Four-Plex	8,650	4.8%	8,968	4.8%
Apartment	46,524	25.9%	47,331	25.4%
Mobile Home	2,626	1.5%	2,695	1.4%
Boat, RV, Van, Etc.	215	0.1%	119	0.1%
Total	179,491	100.0%	186,258	100.0%

HOUSING PROBLEMS

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

Overcrowding occurs in units housing between 1 and 1.5 persons per room, while severe overcrowding occurs in units with 1.5 persons per room or more. According to the 2000 Census, 2.6 percent of housing units were overcrowded in that year and 2 percent of housing

units were severely overcrowded, as shown in Table II.13 below. By 2012, the share of overcrowded housing units had fallen to 2.4 percent and the share of severely overcrowded housing units had fallen to 0.7 percent. In both years, rental units were more affected by overcrowding than owner-occupied units.

Table II.13
Overcrowding and Severe Overcrowding

City of Tulsa
2000 Census SF3 & 2012 Five-Year ACS Data

Data Source	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
Owner							
2000 Census	90,522	98.2%	1,119	1.2%	516	.6%	92,157
2012 Five-Year ACS	86,859	98.5%	1,115	1.3%	209	.2%	88,183
Renter							
2000 Census	67,834	92.1%	3,114	4.2%	2,737	3.7%	73,685
2012 Five-Year ACS	72,084	95.2%	2,744	3.6%	903	01.2%	75,731
Total							
2000 Census	158,356	95.5%	4,233	2.6%	3,253	2.0%	165,842
2012 Five-Year ACS	158,943	97.0%	3,859	2.4%	1,112	0.7%	163,914

Incomplete plumbing or kitchen facilities are other indicators of potential housing problems. According to the Census Bureau, a housing unit is classified as lacking complete plumbing facilities when any of the following are not present: piped hot and cold water, a flush toilet, and a bathtub or shower. Likewise, a unit is categorized as deficient when any of the following are missing from the kitchen: a sink with piped hot and cold water, a range or cook top and oven, and a refrigerator.

The share of households with incomplete plumbing facilities fell by 0.8 percentage points between the two Censuses, as shown in Table II.14 below. While 2.7 percent of the housing stock had been without complete housing facilities in 2000, 1.9 percent of housing units lacked complete plumbing facilities in 2012.

Table II.14
Housing Units with Incomplete Plumbing Facilities

City of Tulsa
2000 Census SF3 & 2012 Five-Year ACS Data

Households	2000 Census	2012 Five-Year ACS
With Complete Plumbing Facilities	393,969	416,739
Lacking Complete Plumbing Facilities	11,018	8,103
Total Households	404,987	424,842
Percent Lacking	2.7%	1.9%

The share of housing units with incomplete kitchen facilities also fell by 0.8 percentage points, as shown in Table II.15 below. Between 2000 and 2012, the share of such units fell from 2.4 to 1.6 percent.

Table II.15
Housing Units with Incomplete Kitchen Facilities

City of Tulsa
2000 Census SF3 & 2012 Five-Year ACS Data

Households	2000 Census	2012 Five-Year ACS
With Complete Kitchen Facilities	395,438	417,900
Lacking Complete Kitchen Facilities	9,549	6,942
Total Households	404,987	424,842
Percent Lacking	2.4%	1.6%

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

The share of households that were cost-burdened grew between the two Census enumerations along with the share of households that were severely cost burdened, as seen in Table II.16 below. Meanwhile, the share of severely cost-burdened households grew from 10.8 to 15.5 percent. As had been the case with overcrowded housing units, the problems of cost-burden and severe-cost burden fell more heavily on rental households than owner-occupied households. A complete version of this table with data for all households is included in Appendix D as Table D.1.

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

City of Tulsa
2000 Census & 2012 Five-Year ACS Data

Data Source	31%-50%		Above 50%		Total
	Households	% of Total	Households	% of Total	
Owner With a Mortgage					
2000 Census	8,135	14.5%	4,596	8.2%	56,224
2012 Five-Year ACS	10,244	18.1%	6,681	11.8%	56,739
Owner Without a Mortgage					
2000 Census	1,341	4.7%	1,002	3.5%	28,475
2012 Five-Year ACS	2,405	7.6%	1,626	5.2%	31,444
Renter					
2000 Census	13,801	18.8%	11,450	15.6%	73,542
2012 Five-Year ACS	18,165	24.0%	17,091	22.6%	75,731
Total					
2000 Census	23,277	14.7%	17,048	10.8%	158,241
2012 Five-Year ACS	30,814	18.8%	25,398	15.5%	163,914

Renters with a severe cost burden are at risk of homelessness. Cost-burdened renters who experience one financial setback often must choose between rent and food or rent and health care for their families. Similarly, homeowners with a mortgage who have just one unforeseen financial constraint, such as temporary illness, divorce, or the loss of employment, may face foreclosure or bankruptcy. Furthermore, households that no longer have a mortgage yet still experience a severe cost burden may be unable to conduct periodic maintenance and repair of their homes, and in turn, may contribute to a dilapidation and blight problem. All three of these situations should be of concern to policymakers and program managers.

HOUSING COSTS

Housing costs rose between 2000 and 2012, as measured in current dollars. As shown in Table II.17 on the following page, the 2000 Census reported a median contract rent of \$511 in the City of Tulsa. By 2012, the city's median contract rent had grown to an estimated \$566, according to data from the Five-Year ACS. At the same time, the median home value in the city grew from \$83,600 to an estimated \$121,700.

Table II.17
Median Housing Costs

City of Tulsa
2000 Census SF3 & 2012 Five-Year ACS Data

Housing Cost	2000	2012 ACS
Median Contract Rent	\$511	\$566
Median Home Value	\$83,600	\$121,700

Median contract rent prices in 2008-2012 were generally above the citywide median in Census tracts to the east, south, and southeast of the city center, as shown in Map II.12 on the following page. By contrast, tracts in the north of the city tended to have median contract rent prices that were at or below the citywide median. In several Census tracts to the north of the city center, median contract rents were less than \$255.

Areas with low median contract rental costs tended to have homes that were valued below the citywide median, as shown in Map II.13 on page 48. However, many of the lowest-valued homes were located to the immediate east of the city center. Tracts with the highest median home values were located in the southern portion of the city.

SUMMARY

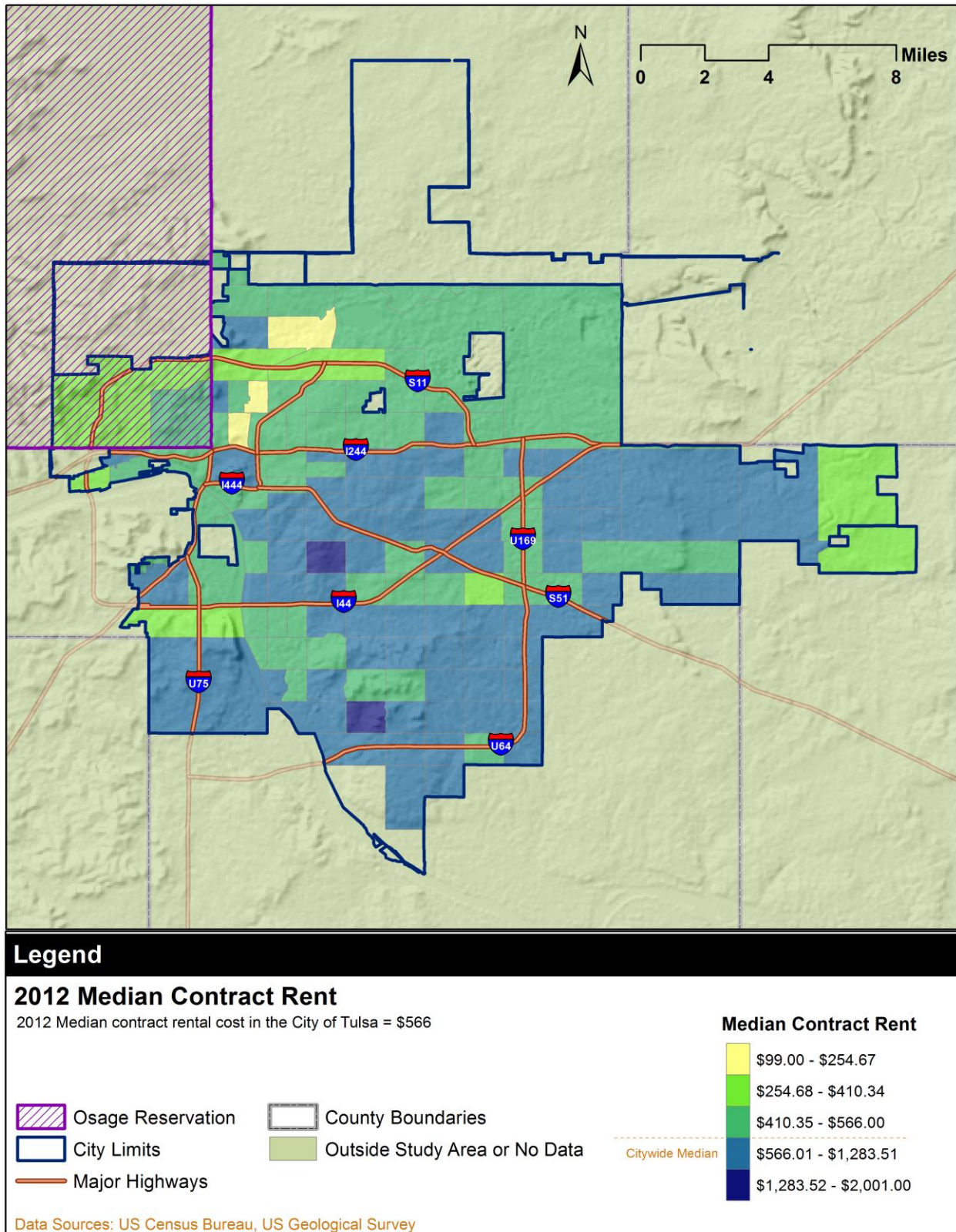
For the first few years after 2000, the population of Tulsa was in decline. However, thanks to strong growth after 2005, the city's population had nearly rebounded to 2000 levels by 2010. This was largely due to an increase the number of residents aged 55 to 64, along with a slight increase in the number of residents aged less than five years. The number of residents in all other age groups decreased, though in the case of residents aged over 65, that overall decline masked a modest increase in the number of residents aged 65 to 66 and 85 or over. Residents aged 35 to 54 accounted for the largest share of residents in 2010 at around a quarter of the population. However, even this relatively large share represented a decline from 28.3 percent in 2000.

White residents accounted for the largest share of the overall population in 2000 and 2010; however, this share became smaller over the decade as the number of white residents in the city fell by 11 percent. The number of black residents grew slightly, and black residents retained roughly the same share of the overall population between Census counts. Hispanic residents, on the other hand, nearly doubled in number and as a share of the overall population, representing 14.1 percent of the city's residents in 2010. In 2000 and 2010, black and Hispanic residents were observed to be concentrated to the north and northeast of the city center, respectively.

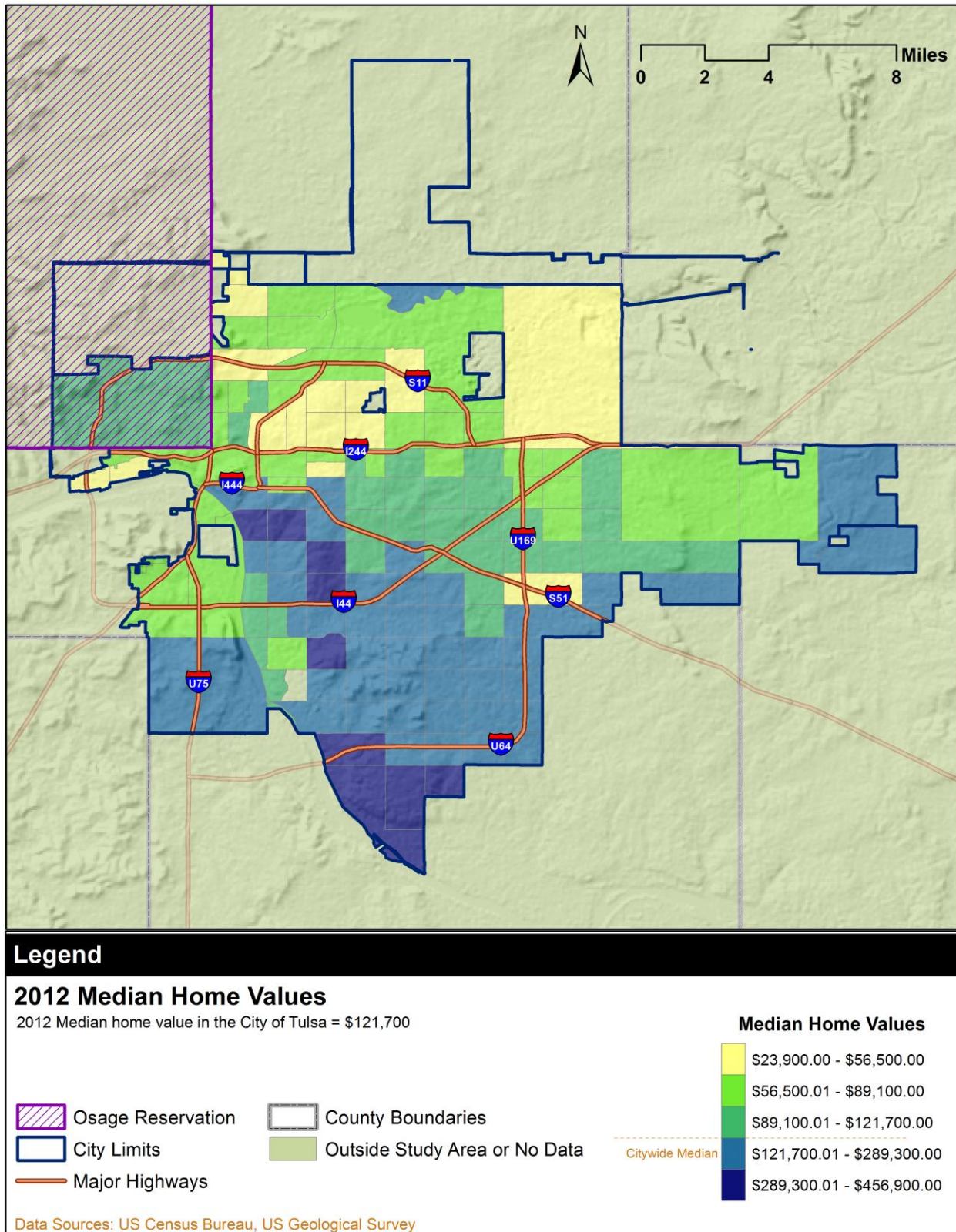
Residents with disabilities accounted for 20.5 percent of the population in 2000. In that year, residents with disabilities tended to live close to the city center, particularly in areas to the north and east of the city center. In 2008-2012, 14.8 percent of the population was living with some form of disability⁸.

⁸ Note: the conceptual framework employed by the Census bureau concerning disability was revised significantly after 2000. These revisions were put into place in 2008. The Census bureau discourages direct comparison between post-2008 and pre-2008 disability figures, as these figures capture different, though overlapping, subsets of the population.

Map II.12
Median Contract Rent
 City of Tulsa
 2012 Five-Year ACS Data



Map II.13
Median Home Value
 City of Tulsa
 2012 Five-Year ACS Data



The number of employed persons in the city fell steadily after 2000, and continued to do so until around 2005. By contrast, the labor force grew from 2000 through 2002, contributing to growth in the unemployment rate, which peaked in 2003 at 6.6 percent. After 2003, the unemployment rate began to fall; however, it increased dramatically in 2009 as approximately 7,000 workers lost their jobs. The unemployment rate continued to rise through 2010, peaking at 7.3 percent in that year. The number of employed persons in the city began to increase after that year; however, the number of full- and part-time jobs in the county did not begin to grow again until the following year.

The period between 2006 and 2010 was also a time of considerable fluctuation in earnings and income, as measured in real dollars. By 2006, the average worker was earning just over \$60,000 at his or her job, in real dollars. The following year, earnings fell by nearly \$4,000; the year after that, they grew by over \$5,000. This pattern continued through 2010, and was reflected in trends in per capita income, which also fluctuated considerably during this time period. However, growth in earnings and income has largely been positive and steady since 2010. Growth in earnings and income in the city since 2000 was reflected in increasing household incomes since that year, as measured in current dollars.

In spite of increasing earnings and income in the city, the poverty rate climbed from 14.1 to 19.7 percent between 2000 and 2008-2012. Census tracts with disproportionately high shares of households in poverty were concentrated in the northwest of the city in 2000 and 2008-2012, in areas that were observed to hold high concentrations of black and Hispanic residents.

The number of housing units in the city increased slightly between 2000 and 2010. However, in keeping with the overall reduction in the city's population during that time, the number of occupied units fell by 1.1 percent. This was largely a result of a reduction in owner-occupied units; the number of renter-occupied units increased by 3.6 percent during this time. However, growth in the number of vacant units was more pronounced, and these units came to account for over 11 percent of the total housing stock by the end of the decade. The number of vacant housing units for sale grew over the decade, outpacing the increase in the number of vacant units overall. However, the number of "other vacant" units grew at a faster pace still, nearly doubling over the decade. These units were observed to be concentrated in the area to the north of the city center. Unfortunately, these units may represent a blighting influence where they are grouped in close physical proximity.

Households also increased in size between the two Censuses as the number of two-, three-, and four-person households fell. Though the number of one-person households grew slightly between 2000 and 2010, this growth was minor compared to the growth in the number of households with five members or more. The composition of the city's housing stock did not change much with respect to the type of housing, and single-family units were the most common type in both years.

Households were less impacted by most of the housing problems described in Census data, with the exception of cost-burdening. In spite of the increase in the size of households after 2000, the share of overcrowded housing units fell by 0.2 percentage points. Housing units are considered overcrowded when they include more than one resident per room on average, and are considered severely overcrowded when the number of residents exceeds 1.5 per room. The share of severely overcrowded households likewise fell by 1.3 percentage points. The

prevalence of housing units with incomplete plumbing and kitchen facilities was also very low, and decreased between 2000 and 2012. Considerably more households were affected by high housing costs relative to their income, or “cost-burdening”. Households are considered to be cost-burdened when more than 30 percent of their monthly income goes toward housing costs, and severely cost-burdened when housing costs claim more than 50 percent of their income. Nearly 19 percent of households were cost-burdened in 2008-2012, and 15.5 percent were severely cost-burdened. Unfortunately, these figures represent a considerable increase over 2000; these increases came as median housing costs grew between 2000 and 2012. In 2000, the median contract rent was \$511; by 2012, this figure had grown to \$566. Home values grew from \$83,600 to \$121,700 over the same time period.

SECTION III. FAIR HOUSING LAW, STUDY, AND CASE REVIEW

As part of the AI process, existing fair housing laws, studies, cases, and other relevant materials were reviewed on a national and local scale. Results of this review are presented below.

FAIR HOUSING LAWS

FEDERAL FAIR HOUSING LAWS

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

Fair Housing Act Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and persons securing custody of children under the age of 18), and handicap (disability).⁹

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, 1991.¹⁰

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.

⁹ "HUD Fair Housing Laws and Presidential Executive Orders."

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

¹⁰ "Title VIII: Fair Housing and Equal Opportunity."

http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/progdesc/title8

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

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

Title IX of the Education Amendments Act of 1972 Title IX prohibits discrimination on the basis of sex in education programs or activities that receive federal financial assistance.¹¹

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, Tulsa residents are protected from discrimination in the local housing market by Title 5, Chapter 1 of Tulsa's Code of Ordinances. Section 104 of this chapter prohibits discrimination in housing on the basis of race, color, religion, disability, national origin, sex, or familial status, and extends additional protections based on marital status and ancestry.

FAIR HOUSING STUDIES

NATIONAL FAIR HOUSING STUDIES

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

Phase 1 – Black and Hispanic Populations

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

¹¹"HUD Fair Housing Laws and Presidential Executive Orders."

Phase 2 – Asian and Pacific Islander Populations

This study, conducted in 2000 and 2001 and based on 889 paired tests in 11 metropolitan areas in the U.S., showed that Asian and Pacific Islander individuals who sought to rent a unit experienced adverse treatment compared to white individuals in 21.5 percent of tests, which was similar to the rate black and Hispanic individuals saw. The study also showed that Asian and Pacific Islander prospective homebuyers experienced adverse treatment compared to white prospective homebuyers 20.4 percent of the time, with discrimination occurring in the availability of housing, inspections, assistance with financing, and encouragement by agents.

Phase 3 – American Indian Population

The last phase of HUD's nationwide effort to measure housing discrimination involved estimating the level of discrimination experienced by American Indian individuals in their search for housing in metropolitan areas across Minnesota, Montana, and City of Tulsa. The findings showed that the American Indian population experienced adverse treatments compared to white individuals in 28.5 percent of rental tests. White individuals were consistently told about advertised units, similar units, and more units than American Indian individuals with similar qualifications. The high level of discrimination experienced by the American Indian population in these areas surpassed rates seen by Hispanic, black, and Asian individuals in the metropolitan rental markets nationwide.¹²

In April 2002, HUD released a national study that assessed public awareness of and support for fair housing law titled *How Much Do We Know?: Public Awareness of the Nation's Fair Housing Laws*. The study found that only 50 percent of the population was able to identify most scenarios describing illegal conduct. In addition, 14 percent of the nationwide survey's adult participants believed that they had experienced some form of housing discrimination in their lifetime. However, only 17 percent of those who had experienced housing discrimination had taken action to resolve the issue, such as filing a fair housing complaint. Finally, two-thirds of all respondents said that they would vote for a fair housing law.¹³

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

¹² "Discrimination in Metropolitan Housing Markets: National Results from Phase 1, Phase 2, and Phase 3 of the Housing Discrimination Study (HDS)." <http://www.huduser.org/portal/publications/hsgfin/hds.html>

¹³ U.S. Department of Housing and Urban Development, Office of Policy Development and Research. *How Much Do We Know?: Public Awareness of the Nation's Fair Housing Laws*. April 2002. <http://www.huduser.org/portal/publications/fairhsg/hmwk.html>

retaliation. One positive finding of the survey was that public support for fair housing law increased from 66 percent in 2000 to 73 percent in 2005.¹⁴

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

- The number of fair housing complaints filed each year steadily increased since 1998. An increasing proportion of grievances alleged discrimination based on disability and a declining proportion alleged discrimination based on race, although race was still the most cited basis of housing discrimination;
- FHAP agencies conducted more fair housing investigations than Fair Housing and Equal Opportunity (FHEO) agencies over the eight-year period. The total number of investigations completed each year increased slightly after declining in 1997 and 1998; and
- Over this time period, an increasing percentage of investigations closed without finding reasonable cause to believe discrimination occurred. However, a declining percentage of investigations were resolved by the parties themselves or with help from FHEO or FHAP agencies.¹⁵

In 2006, the University of Southern California and Oregon State University collaborated to study rental discrimination and race. The universities responded to 1,115 advertisements regarding apartment vacancies in Los Angeles County and signed the bottom of each email with Tyrell Jackson, a traditionally black name; Patrick McDougall, a traditionally white name; or Said Al-Rahman, a traditionally Arab name. Analysis indicated that individuals who were perceived as black were four times more likely to be discouraged from viewing an apartment than persons perceived as white, and individuals considered to be Arab were three times more likely to be discouraged from viewing an apartment than individuals who appeared white. The analysis also noted that applicants perceived as black were more likely to receive negative responses, such as the apartment was no longer available for market rate or above market rate apartments. For example, only an email signed Tyrell Jackson received a reply that reiterated the apartment cost to ensure the apartment was within the applicant's price range. The study also analyzed the responses from private property owners versus corporate property owners, but found no statistical difference in the way the two groups responded to applicants of different races.¹⁶

¹⁴ U.S. Department of Housing and Urban Development, Office of Policy Development and Research. *Do We Know More Now?: Trends in Public Knowledge, Support and Use of Fair Housing Law*. February 2006. <http://www.huduser.org/portal/publications/hsgfin/FairHsgSurvey.html>

¹⁵ U.S. General Accounting Office. "Fair Housing: Opportunities to Improve HUD's Oversight and Management of the Enforcement Process." April 2004. <http://gao.gov/products/GAO-04-463>

¹⁶ Carpusor, Adrian and William Loges. "Rental Discrimination and Ethnicity in Names." *Journal of Applied Social Psychology* 36(4).

Released by the Poverty & Race Research Action Council in January 2008, *Residential Segregation and Housing Discrimination in the United States* asserts that many current governmental efforts to further fair housing actually result in furthering unfair housing practices across the U.S. This article suggests that fair housing efforts can cause residential segregation. For example, if the majority of public housing residents are non-white and most public housing accommodations are grouped in the same Census tracts, residential segregation is resultant. Similarly, many Section 8 voucher holders are racial or ethnic minorities, and most housing that accepts Section 8 vouchers is grouped in selected areas, which again results in residential segregation. The report offers recommendations to curb such residential segregation, including dispersing public housing developments throughout cities and communities and providing greater incentives for landlords with several properties to accept the vouchers.¹⁷

Published in 2009 by the National Fair Housing Alliance, *For Rent: No Kids!: How Internet Housing Advertisements Perpetuate Discrimination* presented research on the prevalence of discriminatory housing advertisements on popular websites such as Craigslist. According to the article, while newspapers are prohibited from publishing discriminatory housing advertisements, no such law exists for websites like Craigslist, as they are considered interactive internet providers rather than publishers of content. As such, they are not held to the same legal standards as newspapers. While individual landlords who post discriminatory advertisements may be held responsible, there are no such standards for companies like Craigslist that post the discriminatory advertisements. Newspapers and other publishers of content are required to screen the advertisements they accept for publishing for content that could be seen as discriminatory. This may include phrases like “no children” or “Christian only,” which violate provisions of the Fair Housing Act that state families with children and religious individuals are federally protected groups.¹⁸

In May 2010, the National Fair Housing Alliance published a fair housing trends report, *A Step in the Right Direction*, which indicated that recent years have demonstrated forward movement in furthering fair housing. The report began with a commendation of HUD’s federal enforcement of fair housing law and noted the agency’s willingness to challenge local jurisdictions that failed to affirmatively further fair housing. In response to the recent foreclosure crisis, many credit institutions have implemented tactics to reduce risk. However, this report suggests that policies that tighten credit markets, such as requiring larger cash reserves, higher down payments, and better credit scores, may disproportionately affect lending options for communities of color and women. *A Step in the Right Direction* concludes with examples of ways in which the fair housing situation could be further improved, including addressing discriminatory internet advertisements and adding gender identity, sexual orientation, and source of income as federally protected classes.¹⁹

The positive note that the NFHA struck in its 2010 report carried over into the following year’s *The Big Picture: How Fair Housing Organizations Challenge Systemic and Institutionalized Discrimination*, published by the Alliance in April of 2011. This report began by noting an encouraging downward trend in the proportion of individuals in large metropolitan areas living

¹⁷ U.S. Housing Scholars and Research and Advocacy Organizations. *Residential Segregation and Housing Discrimination in the United States*. January 2008. <http://prprac.org/pdf/FinalCERDHOUSINGDISCRIMINATIONREPORT.pdf>

¹⁸ National Fair Housing Alliance. *For Rent: No Kids!: How Internet Housing Advertisements Perpetuate Discrimination*. August 2009. <http://www.nationalfairhousing.org/LinkClick.aspx?fileticket=zgbukJP2rMM%3D&tabid=2510&mid=8347>

¹⁹ National Fair Housing Alliance. *A Step in the Right Direction: 2010 Fair Housing Trends Report*. May 2010. <http://www.nationalfairhousing.org/Portals/33/Fair%20Housing%20Trends%20Report%202010.pdf>

in segregation, which had dropped from 69 to 65 percent between 2000 and 2010, according to census data from 2010. The report also highlighted the work of fair housing organizations to combat systemic and institutionalized discrimination produced by exclusionary zoning, NIMBYism, the dual credit market, and other fair housing challenges, often on limited budgets and with limited personnel. The NFHA closed its 2011 report by praising the work of private fair housing organizations while underscoring the need for continued work.²⁰

The 2012 report from the NFHA focused on issues of fair housing in the context of the shifting demographic composition of the United States, where the white population is projected to no longer represent a majority of residents within thirty years. The report discussed encouraging signals from HUD and the Justice Department, who have “increased their efforts and announced landmark cases of mortgage lending, zoning, and other issues that get to the heart of the [Fair Housing] Act: promoting diverse and inclusive communities²¹.” The report also highlights a new arena for discrimination in housing, which has emerged as a result of the massive level of foreclosures in the country in recent years: uneven maintenance of Real Estate Owned (REO) properties in white and minority areas. In concluding, the report hails the creation of the Consumer Financial Protection Bureau as a new ally for fair housing and equal opportunity.²²

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

FAIR HOUSING CASES

NATIONAL FAIR HOUSING CASES

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

²⁰*The Big Picture: How Fair Housing Organizations Challenge Systemic and Institutionalized Discrimination*. National Fair Housing Alliance 2011 Fair Housing Trends Report. 29 April 2011.

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

²¹ <http://www.nationalfairhousing.org/LinkClick.aspx?fileticket=GBv0ZVJp6Gg%3d&tabid=3917&mid=5321>

²² *Ibid.*

racial and socio-economic impacts of their projects.²³ The specifics of the system were not decided upon by the court, but HUD was encouraged to consider the racial composition and income distribution of neighborhoods, racial effects of local regulations, and practices of local authorities.²⁴ The Shannon case gave entitlement jurisdictions the responsibility of considering the segregation effects of publicly-funded housing projects on their communities as they affirmatively further fair housing.

More recently, in a landmark fraud case, Westchester County, New York, was ordered to pay more than \$50 million to resolve allegations of misusing federal funds for public housing projects and falsely claiming their certification of furthering fair housing. The lawsuit, which was filed in 2007 by an anti-discrimination center, alleged that the County failed to reduce racial segregation of public housing projects in larger cities within the County and to provide affordable housing options in its suburbs. The County had accepted more than \$50 million from HUD between 2000 and 2006 with promises of addressing these problems. In a summary judgment in February 2009, a judge ruled that the County did not properly factor in race as an impediment to fair housing and that the County did not accurately represent its efforts of integration in its AI. In the settlement, Westchester County was forced to pay more than \$30 million to the federal government, with roughly \$20 million eligible to return to the County to aid in public housing projects. The County was also ordered set aside \$20 million to build public housing units in suburbs and areas with mostly white populations, and to promote legislation “currently before the Board of Legislators to ban ‘source-of-income’ discrimination in housing (§33(g))”.²⁵

In complying with the latter requirement, the County Executive’s actions were limited to sending five letters to various fair housing advocates, encouraging them to continue their advocacy, and one letter to the Board of Legislators expressing support for the legislation. This bill failed to pass during the 2009 legislative session, and a similar bill was taken up during the 2010 session. In the meantime, Westchester voters elected Rob Astorino to the position of County Executive. Astorino declined to promote the source-of-income legislation before the Board, and when a weakened version of the bill passed in early 2010, he vetoed it. Finding that Westchester had failed to affirmatively further fair housing in the manner agreed upon in the earlier settlement, HUD rejected the County’s AFFH certification and discontinued federal funding. As of April 2013, HUD’s decision had been upheld through several rounds of appeals by the County²⁶. The ramifications of this case are expected to affect entitlement communities across the nation; activities taken to affirmatively further fair housing will likely be held to higher levels of scrutiny to ensure that federal funds are being spent to promote fair housing and affirmatively further fair housing.

In 2008, \$3 billion of federal disaster aid was allotted to the Texas state government to provide relief from damage caused by hurricanes Ike and Dolly. These storms ravaged homes in coastal communities, many of which were owned by low-income families that could not afford to rebuild. However, instead of directing the federal funds to the areas most affected by the storms, the state spread funds across Texas and let local planning agencies spend at will. In

²³ U.S. HUD. *39 Steps Toward Fair Housing*. <http://www.hud.gov/offices/fheo/39steps.pdf>

²⁴ Orfield, Myron. “Racial Integration and Community Revitalization: Applying the Fair Housing Act to the Low Income Housing Tax Credit.” *Vanderbilt Law Review*, November 2005.

²⁵ <http://www.hud.gov/content/releases/settlement-westchester.pdf>

²⁶ *United States v Westchester City* 712 F.3d 761 2013 U.S. App.

reaction to this, two fair housing agencies in the state filed a complaint with HUD stating that the plan violated fair housing laws as well as federal aid requirements that specify half of the funds be directed to lower-income persons. In light of the complaint, HUD withheld \$1.7 billion in CDBG funds until the case was resolved. A settlement was reached in June 2010; the state was required to redirect 55 percent of the amount of the original funds to aid poorer families that lost their homes. The state was also asked to rebuild public housing units that were destroyed by the storms and to offer programs that aid minority and low-income residents in relocating to less storm-prone areas or areas with greater economic opportunities.²⁷

In a recent audit of rental properties in the Dallas-Fort Worth area, the North Texas Fair Housing Center (NTFHC) measured the nature and extent of discrimination based on race and familial status in the North Texas region. The NTFHC discussed the findings of this study in a report published in 2011. According to the report, prospective African-American renters in the Dallas-Fort Worth metroplex can “expect to encounter discrimination in 37 percent of their housing searches”, while Hispanic renters will discriminate housing discrimination in 33 percent of housing searches, and families with children will face discrimination in 20 percent of housing searches. Although the study relied on limited sample sizes (particularly in testing for discrimination against Hispanic applicants and those with children), the findings suggest that housing discrimination is a live issue in the Dallas-Fort Worth area.²⁸

LOCAL FAIR HOUSING CASES

Recent U.S. Department of Justice Cases

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

- Where there is reason to believe that a person or entity is engaged in what is termed a “pattern or practice” of discrimination or where a denial of rights to a group of people raises an issue of general public importance;
- Where force or threat of force is used to deny or interfere with fair housing rights; and
- Where persons who believe that they have been victims of an illegal housing practice file a complaint with HUD or file their own lawsuit in federal or state court.²⁹

The United States Department of Justice maintains a website with descriptions of complaints it has filed on behalf of those who believe that they have been subjected to unlawful discrimination in the housing market. The Department has not lodged a fair housing complaint against an individual or business based in the State of Oklahoma in the last ten years. However, a case settled in September of 2004 in the Western District of Arkansas affected housing complexes in the Tulsa, including Claremore, Broken Arrow, Owasso, and Bixby. This case alleged that the Arkansas-based companies that developed these properties failed to incorporate accessible features required under the Fair Housing Act and the Americans with

²⁷ <http://www.relmanlaw.com/docs/FinalConciliationAgreementTexas.pdf>

²⁸ Rental Audit: Dallas-Fort Worth Metroplex. North Texas Fair Housing Center. April 2011.

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

²⁹ “The Fair Housing Act.” The United States Department of Justice. http://www.justice.gov/crt/about/hce/housing_coverage.php

Disabilities Act. As conditions of the settlement, the builders agreed to correct any violations identified at the properties; establish a \$1.2 million fund to compensate victims of those violations and to make accessibility modifications to the homes of individuals with disabilities in Arkansas; and to pay a civil penalty of \$30,000 to the United States.³⁰

SUMMARY

Tulsa residents are protected from discrimination in the housing market by laws at the federal, state, and local levels. The federal Fair Housing Act serves as the foundation for fair housing policy in the United States, prohibiting discrimination on the bases of race, color, sex, religion, national origin, disability, and familial status. State law extends protections to Oklahoma residents based on these same attributes, and extends additional protection based on age. Tulsa law, while extending no protections based on age, expands on the list of protected classes in the FHA by prohibiting discrimination on the basis of ancestry and marital status. In spite of these protections, national studies indicate that illegal discrimination in the housing market continues, though such discrimination is rarely overt.

³⁰ *United States v. Deer Run Management Co., Inc., et al.* (2004).

SECTION IV. REVIEW OF THE EXISTING FAIR HOUSING STRUCTURE

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.

FAIR HOUSING AGENCIES

FEDERAL AGENCIES

U.S. Department of Housing and Urban Development

The U.S. Department of Housing and Urban Development (HUD) oversees, administers, and enforces the federal Fair Housing Act. HUD's regional office in Fort Worth oversees housing, community development, and fair housing enforcement in Arkansas, Louisiana, New Mexico, Oklahoma, and Texas. Contact information for HUD is listed below³¹:

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>

The Office of Fair Housing and Equal Opportunity (FHEO) within HUD's Fort Worth office enforces the Fair Housing Act and other civil rights laws that prohibit discrimination in housing, mortgage lending, and other related transactions in the City of Tulsa. HUD also provides education and outreach, monitors agencies that receive HUD funding for compliance with civil rights laws, and works with state and local agencies under the Fair Housing Assistance Program (FHAP) and Fair Housing Initiative Program (FHIP), as described below.

Fair Housing Assistance Program

The Fair Housing Assistance Program (FHAP) was designed to support local and city agencies that enforce local fair housing laws, provided that these laws are substantially equivalent to the Fair Housing Act. Substantial equivalency certification is a two-phase process: in the first phase, the Assistant Secretary for Fair Housing and Equal Opportunity makes a *prima facie* determination on the substantial equivalency of a city or local law to the federal Fair Housing Act. Once this determination has been made, and the law has been judged to be substantially equivalent, the agency enforcing the law is certified on an interim basis for a period of three years. During those three years, the local enforcement organization "builds its capacity to operate as a fully certified substantially equivalent agency." FHAP grants during this time period are issued to support the process of building capacity. When the interim certification period ends after three years, the Assistant Secretary issues a determination on whether or not the city law is substantially equivalent to the Fair Housing Act "in operation", this is the second phase of the certification process. If the law is judged to be substantially equivalent in operation, the agency enforcing the law is fully certified as a substantially equivalent agency for five years.

HUD will typically refer most complaints of housing discrimination to a substantially equivalent city or local agency for investigation (such complaints are dual-filed at HUD and the city or local agency), if such an agency exists and has jurisdiction in the area in which the housing discrimination was alleged to have occurred. When federally subsidized housing is involved, however, HUD will typically investigate the complaint.

The benefits of substantially equivalent certification include the availability of funding for local fair housing activities, shifted enforcement power from federal to local authorities, and the potential to make the fair housing complaint process more efficient by vesting enforcement authority in those who are more familiar with the local housing market. In addition, additional funding may be available to support partnerships between local FHAP grantees and private fair housing organizations. (Mention FHAP grantees in the city or state, if any)

Fair Housing Initiative Program

The Fair Housing Initiative Program (FHIP) is designed to support fair housing organizations and other non-profits that provide fair housing services to people who believe they have faced discrimination in the housing market. These organizations provide a range of services including initial intake and complaint processing, referral of complainants to government agencies that enforce fair housing law, preliminary investigations of fair housing complaints, and education and outreach on fair housing law and policy.

FHIP funding is available through three initiatives³²: the Fair Housing Organizations Initiative (FHOI), the Private Enforcement Initiative (PEI), and the Education and Outreach Initiative (EOI). These initiatives are discussed in more detail below:

The Fair Housing Organizations Initiative (FHOI): FHOI funds are designed to help non-profit fair housing organizations build capacity to effectively handle fair housing enforcement and outreach activities. A broader goal of FHOI funding is to strengthen the national fair housing movement by encouraging the creation of fair housing organizations.

The Private Enforcement Initiative (PEI): PEI funds are intended to support the fair housing activities of established non-profit organizations, including testing and enforcement, and more generally to offer a “range of assistance to the nationwide network of fair housing groups”.

The Education and Outreach Initiative (EOI): EOI funding is available to qualified fair housing non-profit organizations as well as city and local government agencies. The purpose of the EOI is to promote initiatives that explain fair housing to the general public and housing providers, and provide the latter with information on how to comply with the requirements of the FHA.

Non-profit organizations are eligible to apply for funding under each or all of these initiatives. To receive FHOI funding, such organizations must have at least two years’ experience in complaint intake and investigation, fair housing testing, and meritorious claims in the three years prior to applying for funding. Eligibility for PEI funding is subject to “certain requirements related to the length and quality of previous fair housing enforcement experience.” Organizations applying for the EOI must also have two years’ experience in the relevant fair housing activities; EOI funds are also potentially available to city and local government agencies.

The Metropolitan Fair Housing Council of Oklahoma (“Metro Fair Housing”) has served Oklahomans who believe that they have been subject to unlawful discrimination in the housing market since 1979. A consistent FHIP participant and grantee, Metro Fair Housing received nearly \$324,500 from HUD in 2013. The purpose of this grant was to allow the organization to increase enforcement efforts, fair housing testing, and accessibility audits, while partnering with public and private organizations to provide fair lending education to state residents. The organization received similar grants in prior years, including grants of around \$324,800 in both 2011 and 2012.

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

³² Though there are four initiatives included in the FHIP, no funds are currently available through the Administrative Enforcement Initiative.

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

907 S. Detroit, Suite 750

Tulsa, OK 74120

Telephone: (918) 581-2201

Website: http://www.ok.gov/oag/About_the_Office/OCRE.html

Complaint Form Available From (PDF): <http://www.ok.gov/oag/documents/OCRE%20-%20Housing%20Discrimination%20Form%20fillable.pdf>

LOCAL AGENCIES

City of Tulsa Human Rights Commission

The City of Tulsa Human Rights Commission exists to “foster mutual respect and understanding and to create an atmosphere conducive to the promotion of amicable relations among all members of the city’s community³³”. As part of its function, it is charged with the enforcement of the City of Tulsa human rights ordinance, and does so by serving as a “quasi-judicial hearing board” in discrimination cases at the city level. The Commission may be contacted by telephone at (918) 596-7818 or email at humanrightsrec@cityoftulsa.org. The Human Rights Department, which accepts and investigates discrimination complaints on behalf of Tulsa residents, may be contacted through the same phone number and email address. The Commission holds meetings on the third Monday of the month at City Hall.

City Hall of Tulsa

175 East 2nd Street

Room 411 (Fourth Floor)

Tulsa, Oklahoma 74103

The Human Rights Department is also located at the same address in Suite 675.

NON-PROFIT ORGANIZATIONS

Metropolitan Fair Housing Council of Oklahoma

The Metropolitan Fair Housing Council of Oklahoma (MFHC) is an Oklahoma City-based non-profit 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:

³³ City of Tulsa. *Human Rights Commission*. <https://www.cityoftulsa.org/community-programs/human-rights/commissions/human-rights-commission.aspx>. Accessed 10 November 2014. Website.

Metropolitan Fair Housing Council of Oklahoma, Inc.

1500 Northeast 4th Street, Suite 204

Oklahoma City, Oklahoma 73117

Telephone (Local): (405) 232-3247 **(Toll Free):** 1 (866) 677-7541

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 eleven 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. The eleven members of the Partnership are as follows:

- Legal Aid Services of Oklahoma
- Tulsa Housing Authority
- Housing Partners of Tulsa
- Metropolitan Tulsa Urban League
- City of Tulsa Human Rights Department
- U.S. Department of Housing and Urban Development
- Metropolitan Tulsa HOME Consortium
- Community Action and Resource Development
- Mental Health Association in Tulsa
- Oklahoma Human Rights Commission
- Ability Resources

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”.³⁴

³⁴ Tulsa Area Fair Housing Partnership. HUD.gov. <http://portal.hud.gov/hudportal/HUD?src=/states/oklahoma/library/tafhp> Accessed 13 November 2014.

COMPLAINT PROCESS REVIEW

COMPLAINT PROCESSES FOR FAIR HOUSING AGENCIES

U.S. Department of Housing and Urban Development

The intake stage is the first step in the complaint process. When a complaint is submitted, intake specialists review the information and contact the complainant (the party alleging housing discrimination) in order to gather additional details and determine if the case qualifies as possible housing discrimination. If the discriminatory act alleged in the complaint occurred within the jurisdiction of a substantially equivalent city or local agency under the FHAP, the complaint is referred to that agency, which then has 30 days to address the complaint. If that agency fails to address the complaint within that time period, HUD can take the complaint back.

If HUD determines that it has jurisdiction and accepts the complaint for investigation, it will draft a formal complaint and send it to the complainant to be signed. Once HUD receives the signed complaint, it will notify the respondent (the party alleged to have discriminated against the complainant) within ten days that a complaint has been filed against him or her. HUD also sends a copy of the formal complaint to the respondent at this stage. Within ten days of receiving the formal complaint, the respondent must respond to the complaint.

Next, the circumstances of the complaint are investigated through interviews and examination of relevant documents. During this time, the investigator attempts to have the parties rectify the complaint through conciliation. The case is closed if conciliation of the two parties is achieved or if the investigator determines that there was no reasonable cause of discrimination. If conciliation fails, and reasonable cause is found, then either a federal judge or a HUD Administrative Law Judge hears the case and determines damages, if any.³⁵ In the event that the federal court judge finds the discrimination alleged in a complaint to have actually occurred, the respondent may be ordered to:

- Compensate for actual damages, including humiliation, pain, and suffering;
- Provide injunctive or other equitable relief to make the housing available;
- Pay the federal government a civil penalty to vindicate the public interest, with a maximum penalty of \$10,000 for a first violation and \$50,000 for an additional violation within seven years; and/or
- Pay reasonable attorneys' fees and costs.³⁶

If neither party elects to go to federal court, a HUD Administrative Law Judge will hear the case. Once the judge has decided the case, he or she issues an initial decision. If the judge finds that housing discrimination has occurred, he or she may award a civil penalty of up to \$11,000 to the complainant, along with actual damages, court costs, and attorney's fees. When the initial decision is rendered, any party that is adversely affected by that decision can petition the Secretary of HUD for review within 15 days. The Secretary has 30 days following the issuance of the initial decision to affirm, modify, or set aside the decision, or call for further

³⁵ "HUD's Title VIII Fair Housing Complaint Process." <http://www.hud.gov/offices/fheo/complaint-process.cfm>

³⁶ "Fair Housing—It's Your Right." <http://www.hud.gov/offices/fheo/FHLaws/yourrights.cfm>

review of the case. If the Secretary does not take any further action on the complaint within 30 days of the initial decision, the decision will be considered final. After that, any aggrieved party must appeal to take up their grievance in the appropriate court of appeals.³⁷

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.].”³⁸ 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.³⁹

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 affirmatory action”.

Human Rights Commission 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 official, which is either the Mayor of Tulsa or the person(s) designated by the Mayor to enforce 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.⁴⁰

Once the complaint has been filed, the compliance official 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 official 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

³⁷ “HUD’s Title VIII Fair Housing Complaint Process.” <http://www.hud.gov/offices/fheo/complaint-process.cfm>

³⁸ §25-1101

³⁹ §25-1502.2-3

⁴⁰ Tulsa Code of Ordinance §5-107

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.⁴¹

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 described on pages 66-67. 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.

SUMMARY

Tulsa residents who believe that they have been subjected to unlawful discrimination in the housing market may seek recourse from agencies and organizations at the federal, state, and local levels. Fair Housing law and policy is directed at the national level by HUD, which accepts complaints from anyone who believes that he or she has been the victim of discrimination outlawed under the Fair Housing Act. The Oklahoma Attorney General's Office of Civil Rights Enforcement enforces the state human rights law, while Tulsa's human rights ordinance is enforced by the Tulsa Human Rights Department. Tulsa residents may also file complaints with the Metropolitan Fair Housing Council, which will conduct an investigation of the complaint and direct the complaint to the appropriate enforcement agency. The Metropolitan Fair Housing Council coordinates on fair housing enforcement and investigation with Legal Aid Services of Oklahoma, which offers legal services to Oklahoma residents who feel that they have been subjected to illegal housing discrimination. Finally, the Tulsa Area Fair Housing Partnership works to promote awareness of fair housing law and policy, and to ensure that Tulsa residents enjoy their right to fair housing choice.

⁴¹ *Ibid.*

SECTION V. FAIR HOUSING IN THE PRIVATE SECTOR

As part of the AI process, the U.S. Department of Housing and Urban Development (HUD) suggests that the analysis focus on possible housing discrimination issues in both the private and public sectors. Examination of housing factors in the City of Tulsa's public sector is presented in **Section VI**, while this section focuses on research regarding the city's private sector, including the mortgage lending market, the real estate market, the rental market, and other private sector housing industries.

LENDING ANALYSIS

HOME MORTGAGE DISCLOSURE ACT

Since the 1970s, the federal government has enacted several laws aimed at promoting fair lending practices in the banking and financial services industries. A brief description of selected federal laws aimed at promoting fair lending follows:

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

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

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

Under the *Home Mortgage Disclosure Act (HMDA)*, enacted in 1975 and later amended, financial institutions are required to publicly disclose the race, sex, ethnicity, and household income of mortgage applicants by the Census tract in which the loan is proposed as well as outcome of the loan application.⁴² The analysis presented herein is from the HMDA data system.

The HMDA requires both depository and non-depository lenders to collect and publicly disclose information about housing-related applications and loans.⁴³ Both types of lending institutions must meet the following set of reporting criteria:

- The institution must be a bank, credit union, or savings association;
- The total assets must exceed the coverage threshold;⁴⁴

⁴² *Closing the Gap: A Guide to Equal Opportunity Lending*, The Federal Reserve Bank of Boston, April 1993. <http://www.bos.frb.org/commdev/closing-the-gap/closingt.pdf>

⁴³ Data are considered "raw" because they contain entry errors and incomplete loan applications. Starting in 2004, the HMDA data made significant changes in reporting, particularly regarding ethnicity data, loan interest rates, and the multi-family loan applications.

- The institution must have had an office in a Metropolitan Statistical Area (MSA);
- The institution must have originated at least one home purchase loan or refinancing of a home purchase loan secured by a first lien on a one- to four-family dwelling;
- The institution must be federally insured or regulated; and
- The mortgage loan must have been insured, guaranteed, or supplemented by a federal agency or intended for sale to the Federal National Mortgage Association (FNMA or Fannie Mae) or the Federal Home Loan Mortgage Corporation (FHLMC or Freddie Mac). These agencies purchase mortgages from lenders and repackage them as securities for investors, making more funds available for lenders to make new loans.

For other institutions, including non-depository institutions, additional reporting criteria are as follows:

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

HMDA data represent most mortgage lending activity and are thus the most comprehensive collection of information available regarding home purchase originations, home remodel loan originations, and refinancing. The Federal Financial Institutions Examination Council (FFIEC) makes HMDA data available on its website. The HMDA data included in this study cover the years from 2008 through 2012. Additional HMDA tables are included in Appendix E.

Home Purchase Loans

Residents and prospective residents of Tulsa applied for 95,166 home loans from 2008 through 2012, according to data collected under the HMDA. As shown in Table V.1 below, refinancing loans accounted for the greatest number of home loan applications. However, 35,946 loans were intended to finance home purchases, which represents a sizeable minority of home loans. The following analysis will focus on home purchase loans.

Table V.1
Purpose of Loan by Year
 City of Tulsa
 2008 - 2012 HMDA Data

Purpose	2008	2009	2010	2011	2012	Total
Home Purchase	8,656	8,711	6,406	5,755	6,418	35,946
Home Improvement	2,058	1,675	1,313	1,202	1,372	7,620
Refinancing	8,454	13,177	10,375	8,536	11,058	51,600
Total	19,168	23,563	18,094	15,493	18,848	95,166

⁴⁴ Each December, the Federal Reserve announces the threshold for the following year. The asset threshold may change from year to year based on changes in the Consumer Price Index for Urban Wage Earners and Clerical Workers.

Home purchase loans are categorized by occupancy status in Table V.2 below. As shown, most of these loans were intended to finance the purchase of owner-occupied housing units, or those in which the applicant intended to live. The following analysis of HMDA loans will be tailored to consider only owner-occupied home purchase loans, since this loan status provides the best index of an applicant's ability to choose where he or she lives. Of the 35,946 home purchase loan applications submitted by Tulsa residents, 32,700 were for owner-occupied units.

Table V.2
Occupancy Status for Home Purchase Loan Applications

City of Tulsa
2008 - 2012 HMDA Data

Status	2008	2009	2010	2011	2012	Total
Owner-Occupied	7,743	8,099	5,883	5,153	5,822	32,700
Not Owner-Occupied	896	594	508	590	578	3,166
Not Applicable	17	18	15	12	18	80
Total	8,656	8,711	6,406	5,755	6,418	35,946

Denial Rates

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

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

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

Table V.3 on the following page presents the outcome of owner-occupied home purchase loan applications. As shown, 17,657 loans were originated and 2,679 were denied, for a denial rate of 13.2 percent over the five-year period. By 2009, the rate of loan denials had fallen to 11.3 percent, though it rose again over the next several years.

Table V.3
Loan Applications by Action Taken

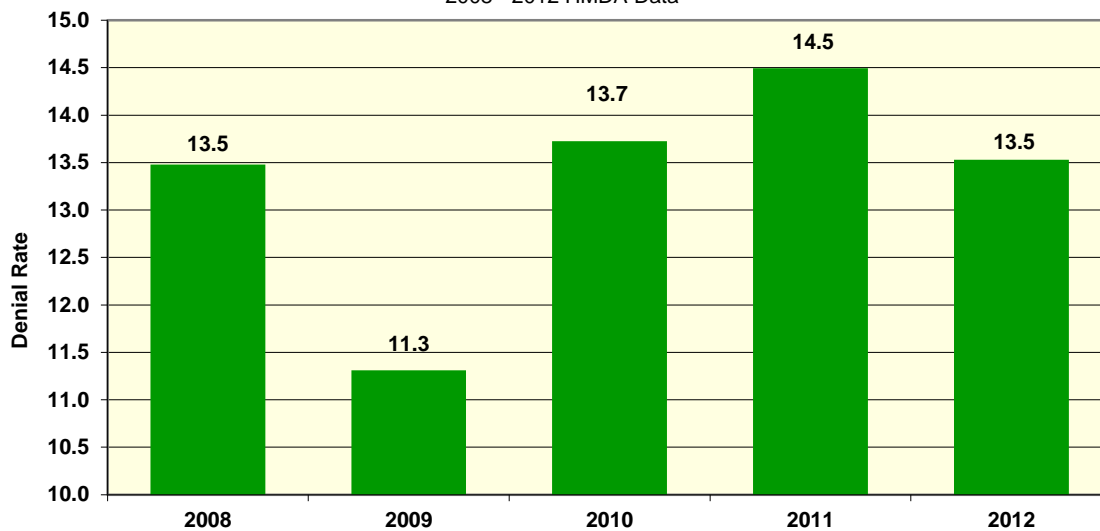
City of Tulsa
2008 - 2012 HMDA Data

Action	2008	2009	2010	2011	2012	Total
Loan Originated	4,159	4,329	3,231	2,755	3,183	17,657
Application Approved but not Accepted	275	216	186	206	177	1,060
Application Denied	648	552	514	467	498	2,679
Application Withdrawn by Applicant	441	498	391	262	351	1,943
File Closed for Incompleteness	80	101	53	81	46	361
Loan Purchased by the Institution	2,138	2,395	1,508	1,382	1,567	8,990
Preapproval Request Denied	2	8	0	0	0	10
Preapproval Approved but not Accepted	0	0	0	0	0	0
Total	7,743	8,099	5,883	5,153	5,822	32,700
Denial Rate	13.5%	11.3%	13.7%	14.5%	13.5%	13.2%

Diagram V.1 below illustrates the yearly trend in loan denial rates. Denial rates were relatively low in 2009, though they increased considerably thereafter.

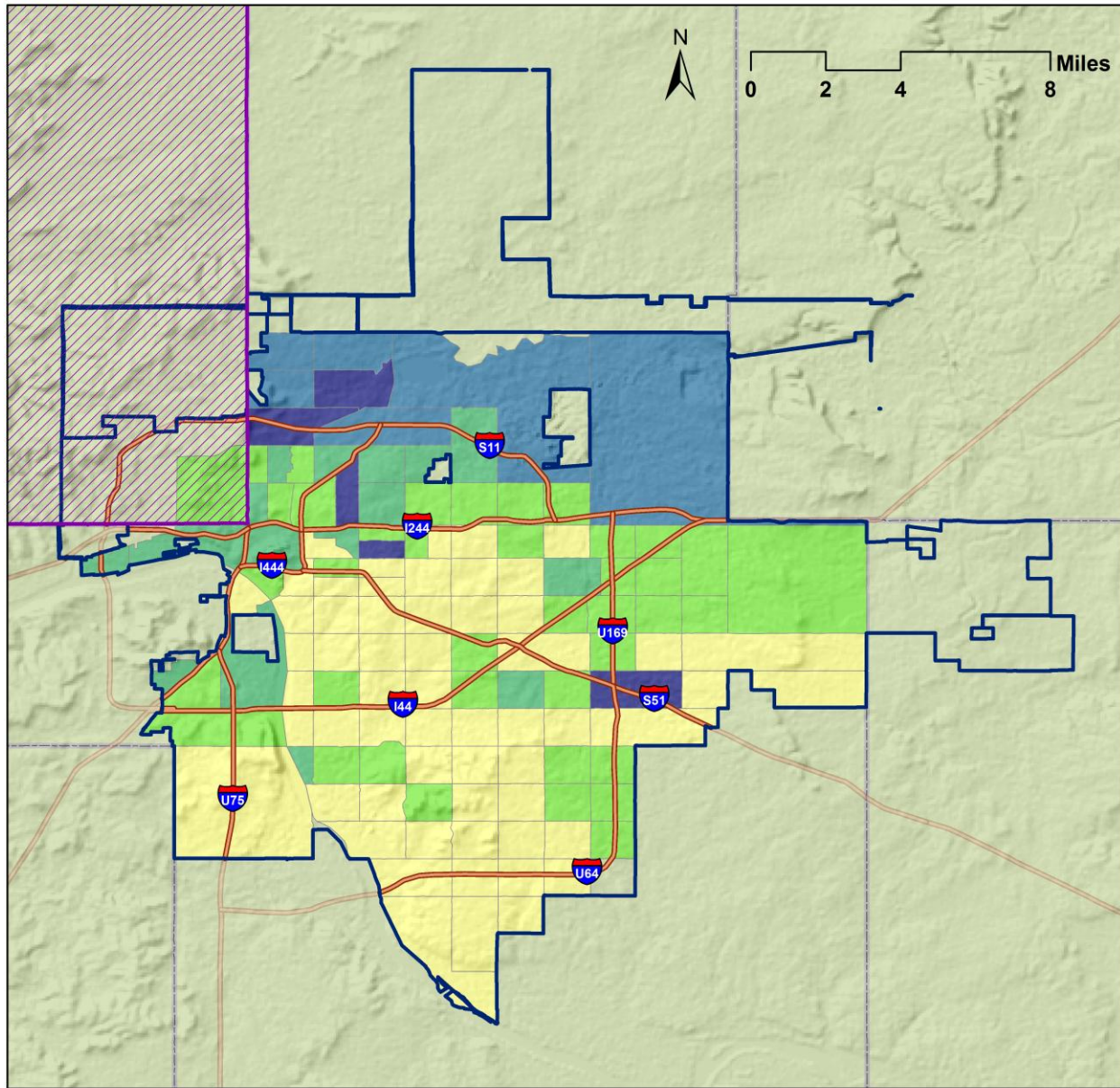
Diagram V.1
Denial Rates by Year

City of Tulsa
2008 - 2012 HMDA Data



On average, 13.2 percent of home purchase loans were denied in Tulsa from 2008 through 2012. As shown in Map V.1 on the following page, areas in which the loan denial rate exceeded this figure by ten percentage points or more were generally concentrated in the northern part of the city. These areas, considered to have disproportionate shares of loan denials, also tended to have disproportionate shares of black and Hispanic residents, as discussed in **Section II**. A similar geographic pattern was observed in 2012, though disproportionate concentrations of loan denials also appeared in Census tract in the south of the city, as shown in Map V.2 on page 74. In both years, denial rates were relatively low to the immediate southeast of the city center.

Map V.1
Denial Rates by Census Tract Before 2011
 City of Tulsa
 2008–2011 HMDA Data



Legend

2008-2011 Loan Denials

2008-2012 Average rate of home loan denials to all applicants in the City of Tulsa = 13.2%
 Disproportionate share threshold = 23.2% (A disproportionate share exists where the rate of loan denials in a given Census tract is ten percentage points higher than the study area average.)

- Osage Reservation
- City Limits
- Major Highways
- County Boundaries
- Outside Study Area or No Data

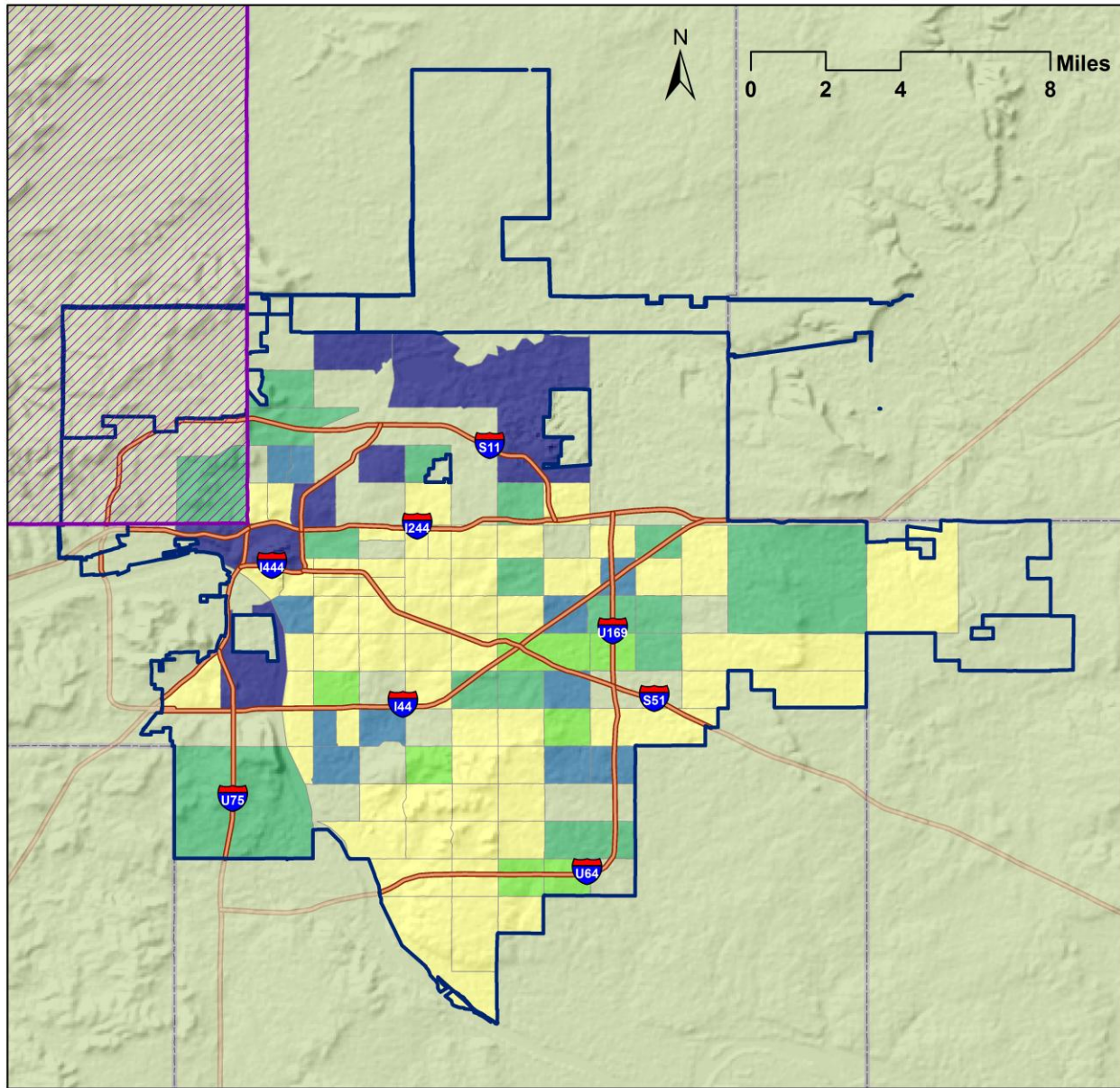
Loan Denials

- 1.2% - 13.2%
- 13.3% - 23.2%
- 23.3% - 40.5%
- 40.6% - 57.7%
- 57.8% - 75%

 Disproportionate Share
 Threshold

Data Sources: US Census Bureau, US Geological Survey, FFIEC HMDA

Map V.2
Denial Rates by Census Tract in 2012
 City of Tulsa
 2012 HMDA Data



Legend

2012 Loan Denials

2008-2012 Average rate of loan denials in the City of Tulsa = 13.2%
 Disproportionate share threshold = 23.2% (A disproportionate share exists where the rate of loan denials in a given Census tract is ten percentage points higher than the study area average.)

- Osage Reservation
- City Limits
- Major Highways
- County Boundaries
- Outside Study Area or No Data

Loan Denials

- 0% - 13.2%
- 13.3% - 23.2%
- 23.3% - 48.8%
- 48.9% - 74.4%
- 74.5% - 100%

Disproportionate Share Threshold

Data Sources: US Census Bureau, US Geological Survey, FFIEC HMDA

In addition, the rate of loan denials was observed to differ according to the gender of the applicant, as shown in Table V.4 below. On average, female loan applicants were denied loans at a rate that exceeded the denial rate for male applicants by 1.5 percentage points. The disparity between the two varied by year, ranging from one percentage point in 2009 to over two percentage points the following year.

Table V.4
Denial Rates by Gender of Applicant
 City of Tulsa
 2008 - 2012 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2008	12.5%	13.7%	33.8%	0.0%	13.5%
2009	10.5%	11.5%	27.3%	0.0%	11.3%
2010	12.3%	14.5%	32.6%	0.0%	13.7%
2011	12.7%	14.3%	45.0%	0.0%	14.5%
2012	12.2%	14.1%	36.0%	0.0%	13.5%
Average	12.0%	13.5%	34.7%	0.0%	13.2%

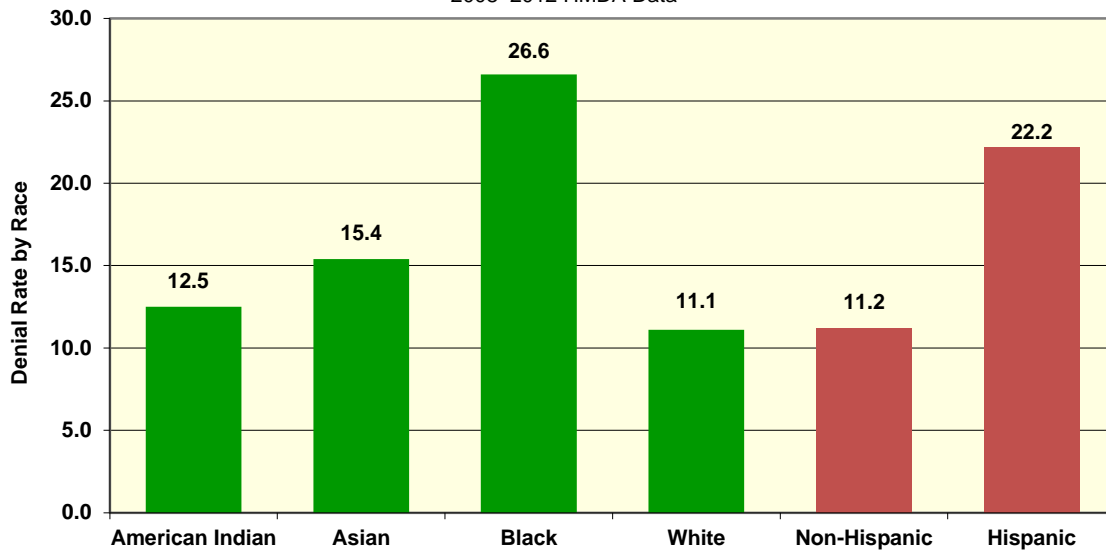
In addition to the variations in loan denial rates discussed above, examination of home purchase loan denials also reveals considerable disparity in loan denials by race and ethnicity. As shown in Table V.5 below, black applicants were denied loans at a rate of 26.6 percent, compared to a denial rate of 11.1 percent for white applicants. Likewise, 22.3 percent of loan applications submitted by Hispanic applicants were denied, compared to a rate of 11.2 percent for non-Hispanic applicants.

Table V.5
Denial Rates by Race/Ethnicity of Applicant
 City of Tulsa
 2008 - 2012 HMDA Data

Race/Ethnicity	2008	2009	2010	2011	2012	Average
American Indian	14.6%	8.7%	14.1%	12.4%	13.2%	12.5%
Asian	16.2%	17.4%	15.1%	13.8%	13.6%	15.4%
Black	22.9%	24.8%	27.0%	34.4%	28.6%	26.6%
White	11.6%	9.7%	11.6%	11.4%	11.6%	11.1%
Not Available	23.7%	18.0%	27.0%	35.2%	31.4%	25.9%
Not Applicable	.0%	0.0%	0.0%	.0%	.0%	0.0
Average	13.5%	11.3%	13.7%	14.5%	13.5%	13.2%
Non-Hispanic	11.7%	9.9%	11.8%	12.0%	11.1%	11.2%
Hispanic	26.5%	19.6%	21.3%	18.5%	24.6%	22.3%

Diagram V.2 on the following page shows overall denial rates by race and ethnicity from 2008 through 2012.

Diagram V.2
Denial Rates by Race/Ethnicity of Applicant
 City of Tulsa
 2008–2012 HMDA Data

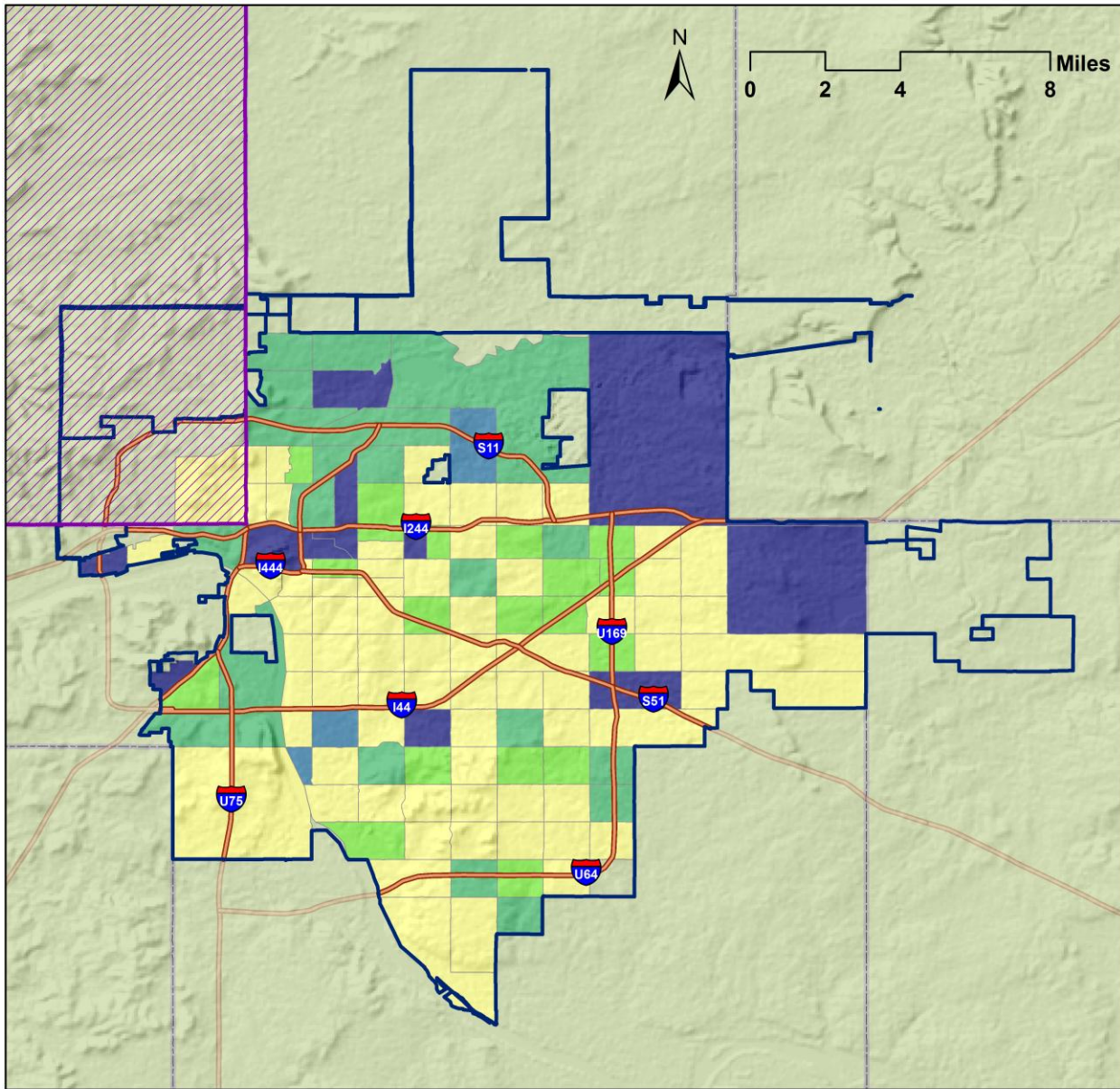


Though the area to the immediate north of the city center held the highest concentrations of black residents in 2000 and 2010, the rate of loan denials to black applicants tended to be highest in Census tracts outside of that area. As shown in Map V.3 on the following page, denial rates for black applicants were at or below average in three of the Census tracts to the immediate north of the city center; tracts in which black residents accounted for relatively large shares of the population. Census tracts with relatively high rates of loan denials to black applicants were generally located in the northern portion of the city, though there were tracts with high denial rates scattered throughout the southern half of the city.

By contrast, Hispanic residents were denied loans at a disproportionate rate in Census tracts to the immediate northeast of the city center; an area observed to hold high concentrations of Hispanic residents in 2000 and 2010. However, as shown in Map V.4 on page 78, high denial rates for Hispanic residents were not isolated to that area, but were scattered throughout the city.

It is important to note that HMDA data do not include certain information that is highly pertinent to the loan application process, such as the credit score of the applicant or the down payment amount, so it is not possible to analyze all of the factors that lead to a loan denial. For that reason, it is not possible to establish whether, or to what degree, the differential denial rates described above are the result of illegal discrimination on the basis of race, ethnicity, or sex. However, these data do provide some indication of the experience of borrowers in the market place, and indicate that a borrower is less likely to secure a loan if that borrower is black, Hispanic, or female.


Map V.3
Denial Rates for Black Applicants by Census Tract
 City of Tulsa
 2008–2011 HMDA Data








Legend

2008-2011 Loan Denials to Black Applicants

2008-2012 Average rate of home loan denials to black applicants in the City of Tulsa = 26.6% Disproportionate share threshold = 36.6% (A disproportionate share exists where the rate of loan denials in a given Census tract is ten percentage points higher than the study area average.)

-  Osage Reservation
-  City Limits
-  Major Highways
-  County Boundaries
-  Outside Study Area or No Data

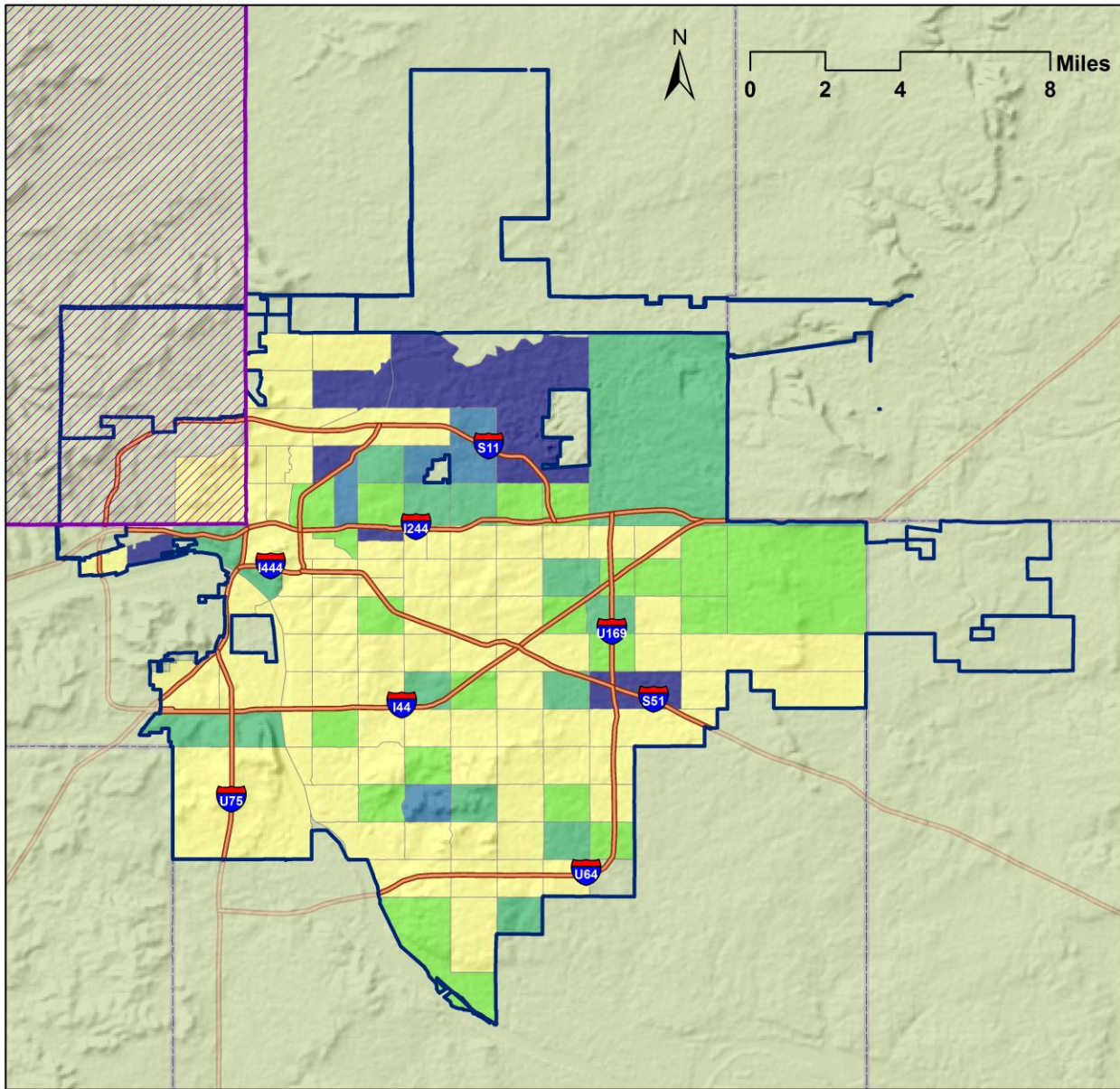
Loan Denials

-  0% - 26.6%
-  26.7% - 36.6%
-  36.7% - 57.7%
-  57.8% - 78.9%
-  79% - 100%

 Disproportionate Share
 Threshold

Data Sources: US Census Bureau, US Geological Survey, FFIEC HMDA






Map V.4
Denial Rates for Hispanic Applicants by Census Tract
 City of Tulsa
 2008-2011 HMDA Data

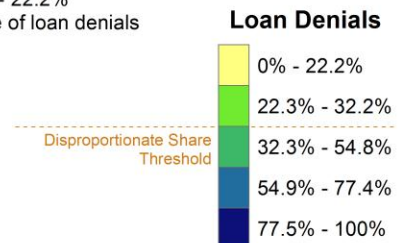


Legend

2008-2011 Loan Denials to Hispanic Applicants

2008-2012 Average rate of home loan denials to Hispanic applicants in the City of Tulsa = 22.2%
 Disproportionate share threshold = 32.2% (A disproportionate share exists where the rate of loan denials in a given Census tract is ten percentage points higher than the study area average.)

-  Osage Reservation
-  City Limits
-  Major Highways
-  County Boundaries
-  Outside Study Area or No Data



Data Sources: US Census Bureau, US Geological Survey, FFIEC HMDA

Loan data collected under the HMDA generally identify the stated reasons for loan denials, and these data are presented in Table V.6 below. Credit history was consistently a factor in loan denials; more than a fifth of loans denied between 2008 and 2012 cited credit history as a factor in the denial. Debt-to-income ratio was also a prominent factor in loans denials during this time.

Table V.6
Loan Applications by Reason for Denial

City of Tulsa
2008 - 2012 HMDA Data

Denial Reason	2008	2009	2010	2011	2012	Total
Debt-to-Income Ratio	91	87	118	86	76	458
Employment History	22	20	20	14	17	93
Credit History	141	133	126	101	99	600
Collateral	53	50	36	38	39	216
Insufficient Cash	22	18	9	14	7	70
Unverifiable Information	28	18	14	13	11	84
Credit Application Incomplete	43	27	18	18	29	135
Mortgage Insurance Denied	3	5	2	0	0	10
Other	54	29	26	15	24	148
Missing	191	165	145	168	196	865
Total	648	552	514	467	498	2,679

As one might expect, the rate of loan denials fell as the income of applicants increased. As shown in Table V.7 below, more than half of loans submitted by applicants earning \$15,000 per year or less were denied from 2008 through 2012. Denial rates fell progressively for applicants in higher income brackets, and for those earning more than \$75,000 per year the denial rate was only 8.2 percent.

Table V.7
Denial Rates by Income of Applicant

City of Tulsa
2008 - 2012 HMDA Data

Income	2008	2009	2010	2011	2012	Total
\$15,000 or Below	35.8%	53.7%	55.8%	68.3%	65.6%	54.3%
\$15,001–\$30,000	21.0%	17.6%	22.3%	23.6%	25.4%	21.5%
\$30,001–\$45,000	14.8%	11.6%	15.4%	19.3%	15.8%	14.9%
\$45,001–\$60,000	15.0%	10.2%	11.8%	12.3%	13.3%	12.6%
\$60,001–\$75,000	10.7%	8.9%	8.8%	9.7%	10.3%	9.7%
Above \$75,000	8.8%	7.9%	7.8%	8.3%	8.1%	8.2%
Data Missing	12.1%	12.1%	24.5%	16.1%	19.0%	15.7%
Total	13.5%	11.3%	13.7%	14.5%	13.5%	13.2

Though denial rates tended to fall with entry into higher income brackets, the disparities observed previously in denial rates by race and ethnicity persisted even when applicants earned roughly the same incomes, as shown in Table V.8 on the following page. For example, black applicants making more than \$75,000 per year were denied loans at a rate of 22.6 percent, more than three times the rate at which loans were denied to similarly-situated white applicants, which was 7.2 percent. Similarly, Hispanic applicants earning more than \$75,000 per year were subject to a denial rate of 9.3 percent, compared to 7.5 percent for non-Hispanic applicants in the same income range.

Table V.8
Denial Rates of Loans by Race/Ethnicity and Income of Applicant

City of Tulsa
 2008 - 2012 HMDA Data

Race	<= \$15K	\$15K-\$30K	\$30K-\$45K	\$45K-\$60K	\$60K-\$75K	Above \$75K	Data Missing	Average
American Indian	85.7%	20.8%	13.2%	10.2%	9.4%	7.6%	9.1%	12.5%
Asian	33.3%	23.5%	19.4%	12.0%	10.8%	10.7%	0.0%	15.4%
Black	52.2%	30.4%	26.7%	20.1%	23.9%	22.6%	31.3%	26.6%
White	50.3%	18.1%	12.3%	11.2%	8.2%	7.2%	12.7%	11.1%
Not Available	84.2%	43.2%	30.8%	23.7%	18.6%	15.0%	42.9%	25.9%
Not Applicable	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Average	54.3%	21.5%	14.9%	12.6%	9.7%	8.2%	15.7%	13.2%
Non-Hispanic	47.8%	18.9%	12.4%	10.7%	9.0%	7.5%	12.1%	11.2%
Hispanic	58.8%	22.1%	23.5%	24.2%	12.7%	9.3%	53.8%	22.3%

Predatory Lending

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

- If they are HOEPA loans;⁴⁵
- Lien status, such as whether secured by a first lien, a subordinate lien, not secured by a lien, or not applicable (purchased loans); and
- Presence of high annual percentage rate (APR) loans (HALs), defined as more than three percentage points higher than comparable treasury rates for home purchase loans, or five percentage points higher for refinance loans.⁴⁶

Of the 17,657 loans originated in the City of Tulsa from 2008 through 2012, some 790 were HALs, as shown in Table V.9 below. These figures yield a HAL rate of 4.5 percent. As shown in Diagram V.3 on the following page, predatory style lending has lessened considerably since 2008, continuing a downward trend in HAL rates that began in 2007 and corresponded to the decline of the mortgage-backed securities market⁴⁷. HAL rates have remained low since 2009, likely the result, in part, of increased regulation on high-priced loans after 2008.⁴⁸

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

City of Tulsa
 2008 - 2012 HMDA Data

Loan Type	2008	2009	2010	2011	2012	Total
Other	3,758	4,084	3,182	2,709	3,134	16,867
HAL	401	245	49	46	49	790
Total	4,159	4,329	3,231	2,755	3,183	17,657
Percent HAL	9.6%	5.7%	1.5%	1.7%	1.5%	4.5%

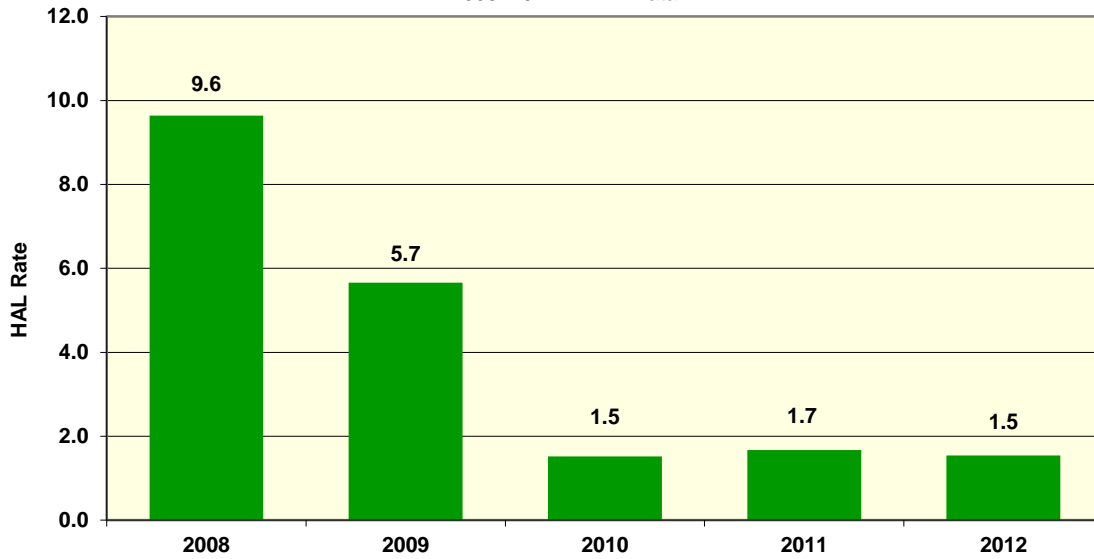
⁴⁵ Loans are subject to the HOEPA if they impose rates or fees above a certain threshold set by the Federal Reserve Board. "HMDA Glossary." <http://www.ffiec.gov/hmda/glossary.htm#H>

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

⁴⁷ Avery et al. *The 2009 HMDA Data: The Mortgage Market in a Time of Low Interest Rates and Economic Distress*. Federal Reserve Bulletin. December 2010.

⁴⁸ Notable examples of such regulation include the Federal Reserve Board rule adopted in October 2009, which introduced more stringent requirements on banks to determine a loan applicant's ability to repay high priced loans, and Dodd-Frank, enacted in 2010.

Diagram V.3
HAL Rates by Year
 City of Tulsa
 2008–2012 HMDA Data



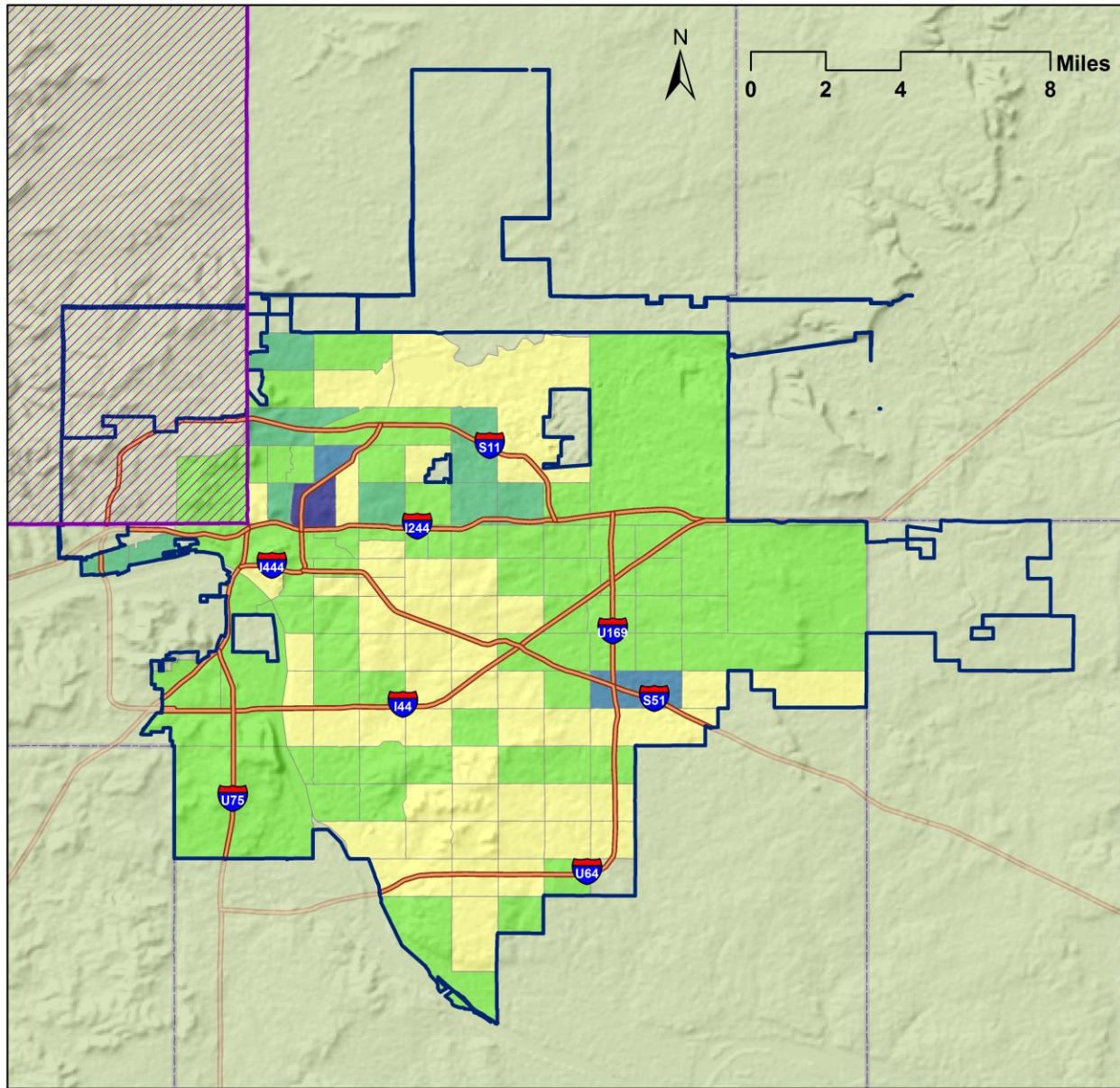
Tracts with high concentrations of these loans, which are considered predatory in nature, were concentrated to the north and northeast of the city center, as shown in Map V.5 on the following page. In many of these areas, more than 14.6 percent of loans issued to borrowers were HALs. Relatively high HAL rates were also observed along with Broken Arrow Corridor.

As had been the case with home purchase loan denials, the incidence of HALs varied considerably according to the race and ethnicity of the borrower, as shown in Table V.10 below. Over seven percent of loans issued to black applicants from 2008 through 2012 were HALs, compared to a HAL rate of 4.4 percent for white borrowers. Similarly, 6.2 percent of loans issued to Hispanic applications were HALs, compared to a HAL rate of 4.3 percent for non-Hispanic applicants.

Table V.10
Rate of HALs Originated by Race/Ethnicity of Borrower
 City of Tulsa
 2008 - 2012 HMDA Data

Race	2008	2009	2010	2011	2012	Average
American Indian	8.2%	2.4%	.0%	.0%	1.0%	2.3%
Asian	9.2%	7.6%	1.1%	2.9%	3.2%	5.2%
Black	16.4%	5.9%	2.1%	3.8%	.9%	7.6%
White	9.1%	6.0%	1.3%	1.6%	1.6%	4.4%
Not Available	9.6%	2.8%	5.6%	2.4%	2.9%	4.7%
Not Applicable	50.0%	40.0%	.0%	.0%	.0%	22.2
Average	9.6%	5.7%	1.5%	1.7%	1.5%	4.5%
Non-Hispanic	9.3%	5.6%	1.1%	1.6%	1.4%	4.3%
Hispanic	14.2%	8.1%	2.5%	1.8%	2.6%	6.2%

Map V.5
Rate of HALs by Census Tract
 City of Tulsa
 2008–2011 HMDA Data



Legend

2008-2011 HALs to All Borrowers

2008-2012 Average rate of HALs to all borrowers in the City of Tulsa = 4.5%
 Disproportionate share threshold = 14.5% (A disproportionate share exists where the rate of HALs in a given Census tract is ten percentage points higher than the study area average.)

- Osage Reservation
- City Limits
- Major Highways
- County Boundaries
- Outside Study Area or No Data

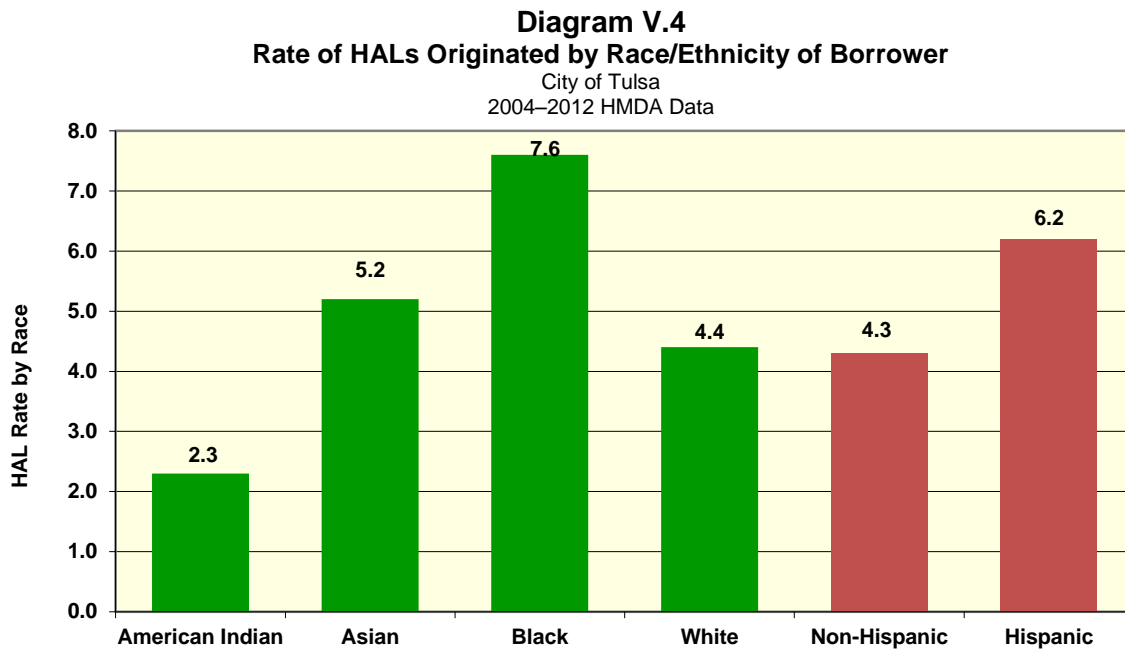
HAL Rates

- 0% - 4.5%
- 4.6% - 14.5%
- 14.6% - 29.7%
- 29.8% - 44.8%
- 44.9% - 60%

Disproportionate Share Threshold

Data Sources: US Census Bureau, US Geological Survey, FFIEC HMDA

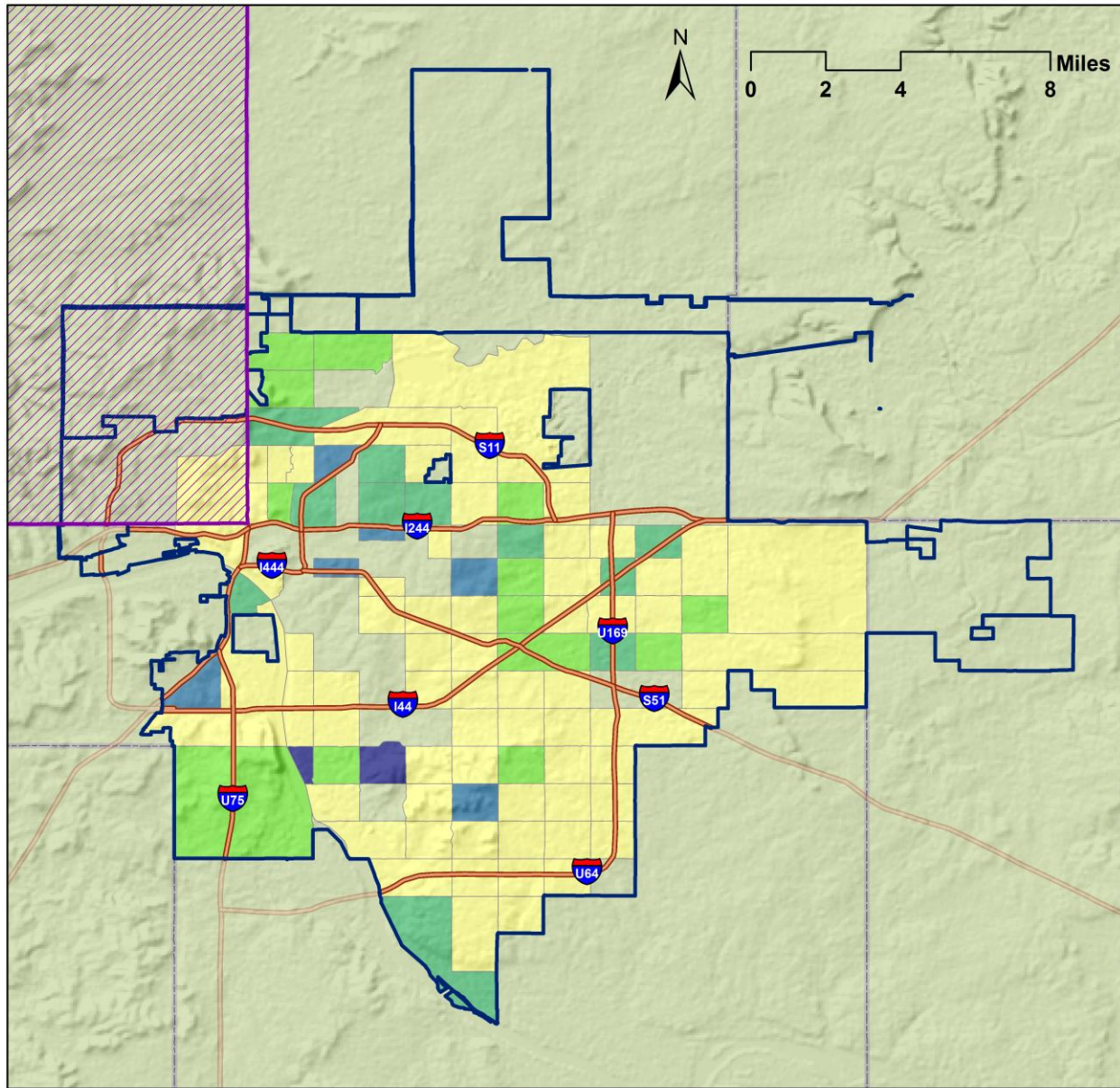
Diagram V.4 below shows how the incidence of HALs varied according to the race or ethnicity of the borrower.



Black borrowers tended to receive higher HAL rates outside of areas with high concentrations of black residents, as shown in Map V.6 on the following page, though there were some Census tracts with high concentrations of black residents and HALs to black borrowers. In fact, there was no clear overall trend in the concentration of HALs; tracts with high rates of HALs tended to be scattered throughout the city. However, there was some clustering of tracts with high HAL rates to the northeast of the city center and in the southern portion of the city.

Likewise, Hispanic residents were subject to disproportionately high HAL rates in Census tracts throughout the city, as shown in Map V.7 on page 85. However, there was some tendency for these tracts to be clustered in areas to the northeast of the city center, an area with a high concentration of Hispanic residents. More than 16.2 percent of loans issued to Hispanic residents were HALs throughout most of that area, and in Census tracts scattered throughout the western portion of town.

Map V.6
HALs to Black Borrowers by Census Tract
 City of Tulsa
 2008-2011 HMDA Data



Legend

2008-2011 HALs to Black Borrowers

2008-2012 Average rate of HALs to black borrowers in the City of Tulsa = 7.6%
 Disproportionate share threshold = 17.6% (A disproportionate share exists where the rate of HALs in a given Census tract is ten percentage points higher than the study area average.)

- Osage Reservation
- City Limits
- Major Highways
- County Boundaries
- Outside Study Area or No Data

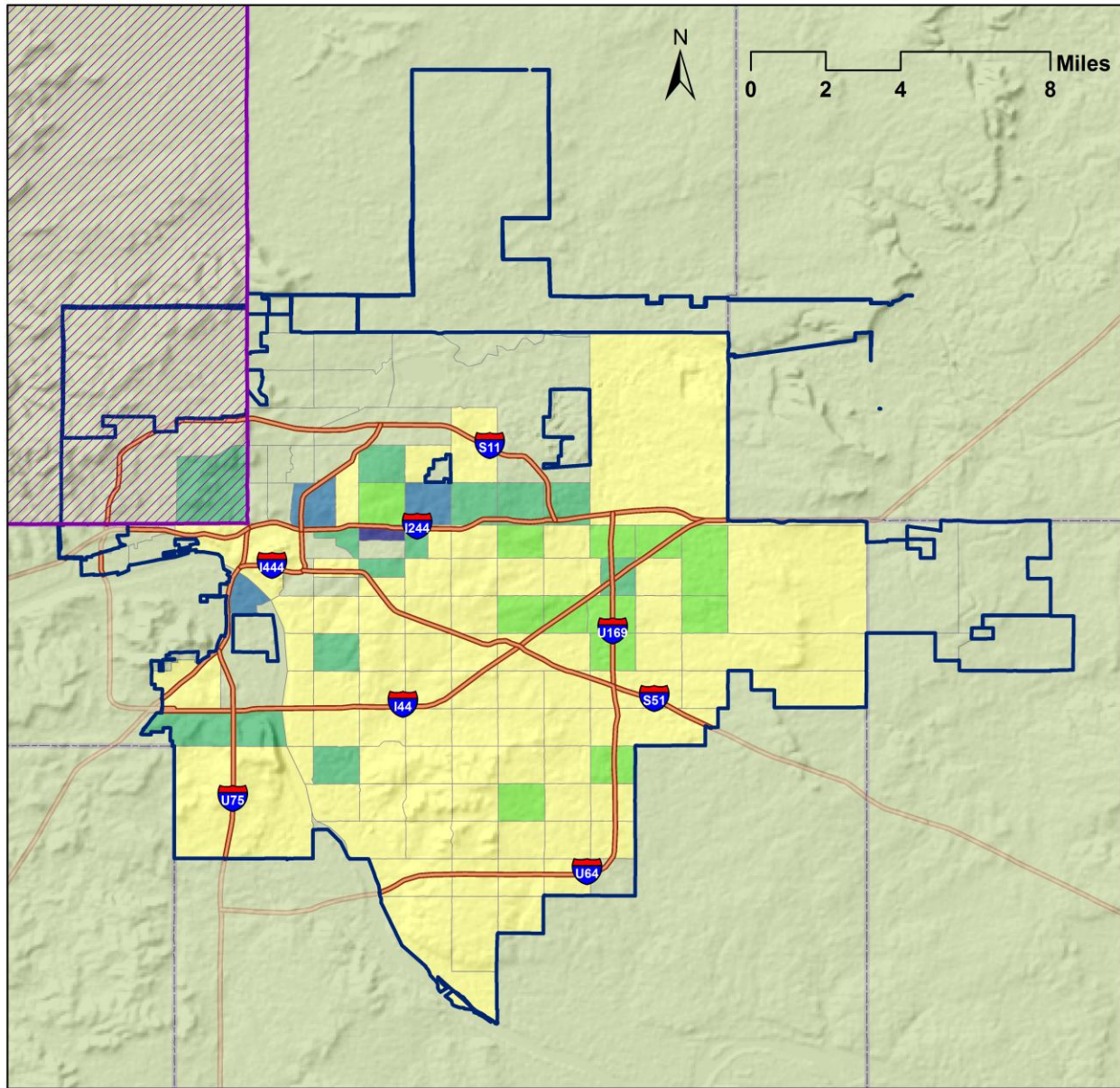
HAL Rates

- 0% - 7.6%
- 7.7% - 17.6%
- 17.7% - 45.1%
- 45.2% - 72.5%
- 72.6% - 100%

Disproportionate Share Threshold

Data Sources: US Census Bureau, US Geological Survey, FFIEC HMDA

Map V.7
HALs to Hispanic Borrowers by Census Tract
 City of Tulsa
 2008–2011 HMDA Data



Legend

2008-2011 HALs to Hispanic Borrowers

2008-2012 Average rate of HALs to Hispanic borrowers in the City of Tulsa = 6.2%
 Disproportionate share threshold = 16.2% (A disproportionate share exists where the rate of HALs in a given Census tract is ten percentage points higher than the study area average.)

- Osage Reservation
- City Limits
- Major Highways
- County Boundaries
- Outside Study Area or No Data

HAL Rates

- 0% - 6.2%
- 6.3% - 16.2%
- 16.3% - 44.1%
- 44.2% - 72.1%
- 72.2% - 100%

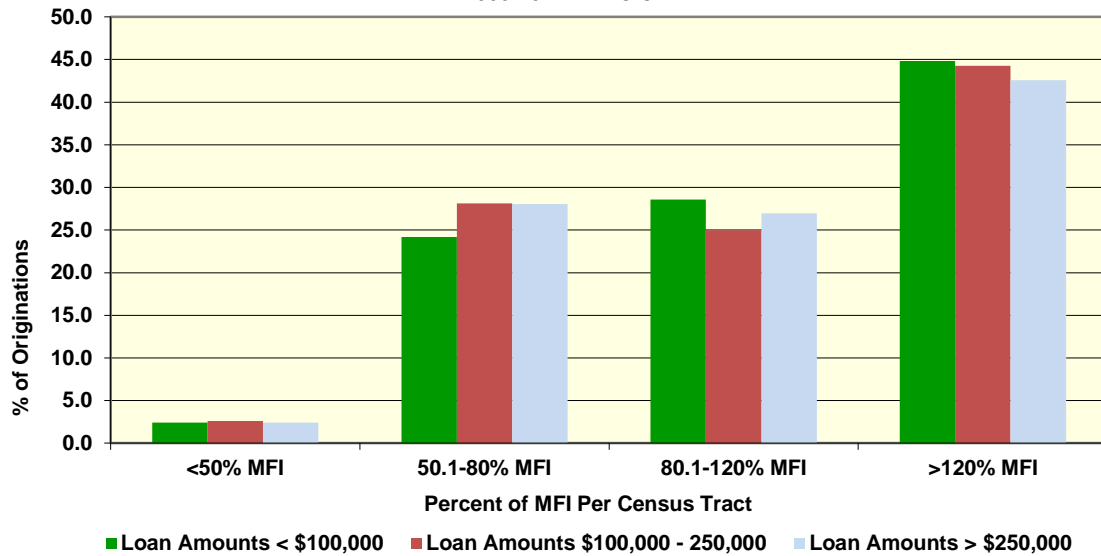
Disproportionate Share Threshold

Data Sources: US Census Bureau, US Geological Survey, FFIEC HMDA

COMMUNITY REINVESTMENT ACT DATA

Economic vitality of neighborhoods can partly be measured through Community Reinvestment Act (CRA) data. A total of 145,488 loans were issued in the city from 2000 through 2012. Of these, nearly 130,066, or around 90 percent, were valued at \$100,000 or less. As shown in Diagram V.5 below, less than 5 percent of all loans went to the lowest income tracts, i.e., tracts in which the median family income was less than 50 percent of the area median family income. Census tracts with moderate income levels were issued more small business loans; however, over 40 percent of all small business loans went to Census tracts in the highest income bracket. Tables with complete CRA data are presented in Appendix A.

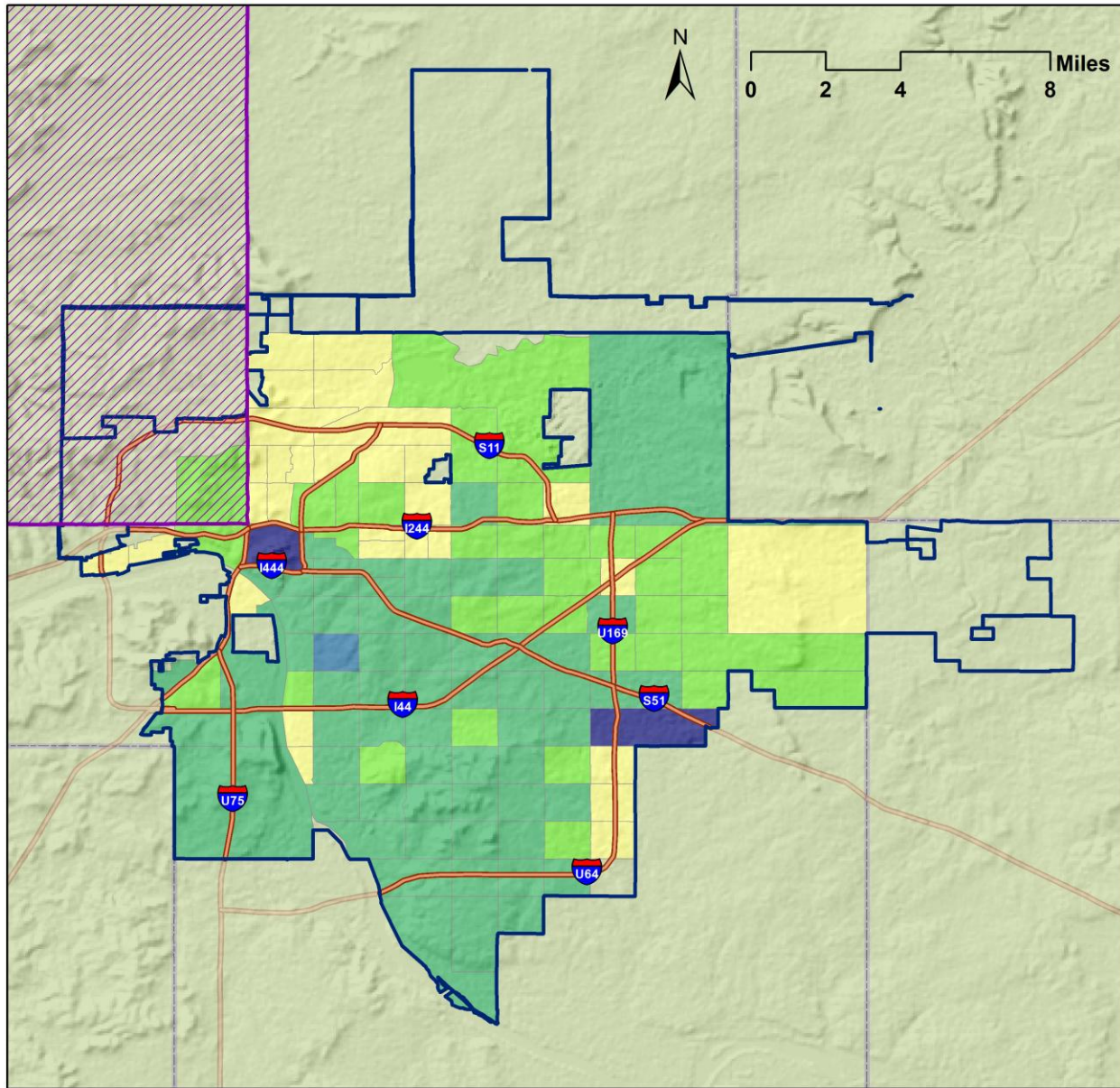
Diagram V.5
Small Business Loans Originated: More than \$250,000 by Tract MFI
 City of Tulsa
 2000-2012 FFIEC CRA



The geographic distribution of small business loans issued in the city from 2000 through 2011 is presented in Map V.8 on the following page. As shown, the city center was the target of considerable investment during that time, along with the Broken Arrow Corridor. These two areas each received more than 5,657 loans over the twelve-year period. The median number of small business loans issued in the city was 832, and the number of loans issued in Census tracts to the south of Interstate 244 tended to be above that median. By contrast, relatively few small business loans were issued in Census tracts to the north and northeast of the city center, which held a higher concentration of black and Hispanic residents and residents who were living in poverty.

The geographic distribution of small business loans in 2012 followed the same overall pattern as loans issued during the prior period, as shown in Map V.9 on page 88. As many as 423 loans were issued in both the city center and Broken Arrow Corridor in that year, and the number of loans issued in the area to the south of Interstate 244 continued to be above the citywide median for most Census tracts. Once again, small business lending largely tended to bypass the area to the north and northeast of the city center.

Map V.8
Number of Small Business Loans Per 100 Residents, 2000-2011
 City of Tulsa
 2000-2012 CRA Data



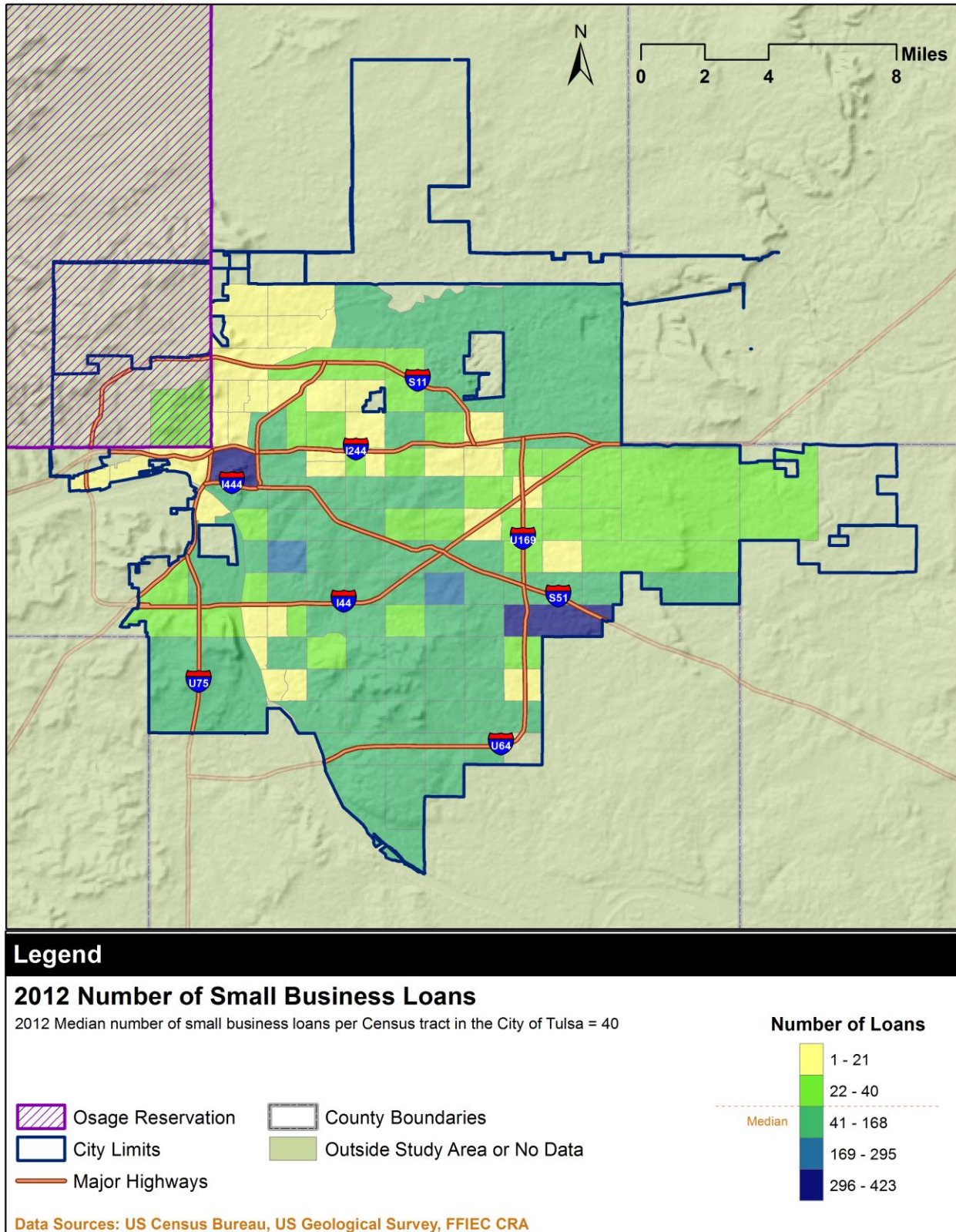
Legend

2000-2011 Small Business Loans
 2000-2011 Median number of loans per Census tract in the City of Tulsa = 832

Osage Reservation	County Boundaries	<p>Number of Loans</p>
City Limits	Outside Study Area or No Data	
Major Highways		

Data Sources: US Census Bureau, US Geological Survey, FFIEC CRA

Map V.9
Number of Small Business Loans Per 100 Residents, 2012
 City of Tulsa
 2000–2012 CRA Data



The distribution of loan dollars in the city from 2000 through 2011 is presented in Map V.10 on the following page. During that time, the median dollar value of small business loans per Census tract was \$36,961. As one might expect, the distribution of loan dollars reflected the distribution of loans themselves. More loan dollars tended to go to Census tracts to the south of Interstate 244, particularly along the Broken Arrow Corridor and in the city center. The latter area received more than half a million dollars in small business loans over the twelve-year period. By contrast, less than \$20,000 in loans was issued in Census tracts to the north of the city center.

The median dollar value of small business loans issued per tract in 2012 was \$1,921. As shown in Map V.11 on page 91, the city center and Broken Arrow Corridor continued to enjoy considerable investment, and the total value of loans issued to the south of Interstate 244 continued to be above the citywide median in most Census tracts. By the same token, the total value of loans issued in Census tracts to the north of the city center continued to be well below the median. Most of these tracts received less than \$1,000 in 2012.

FAIR HOUSING COMPLAINTS

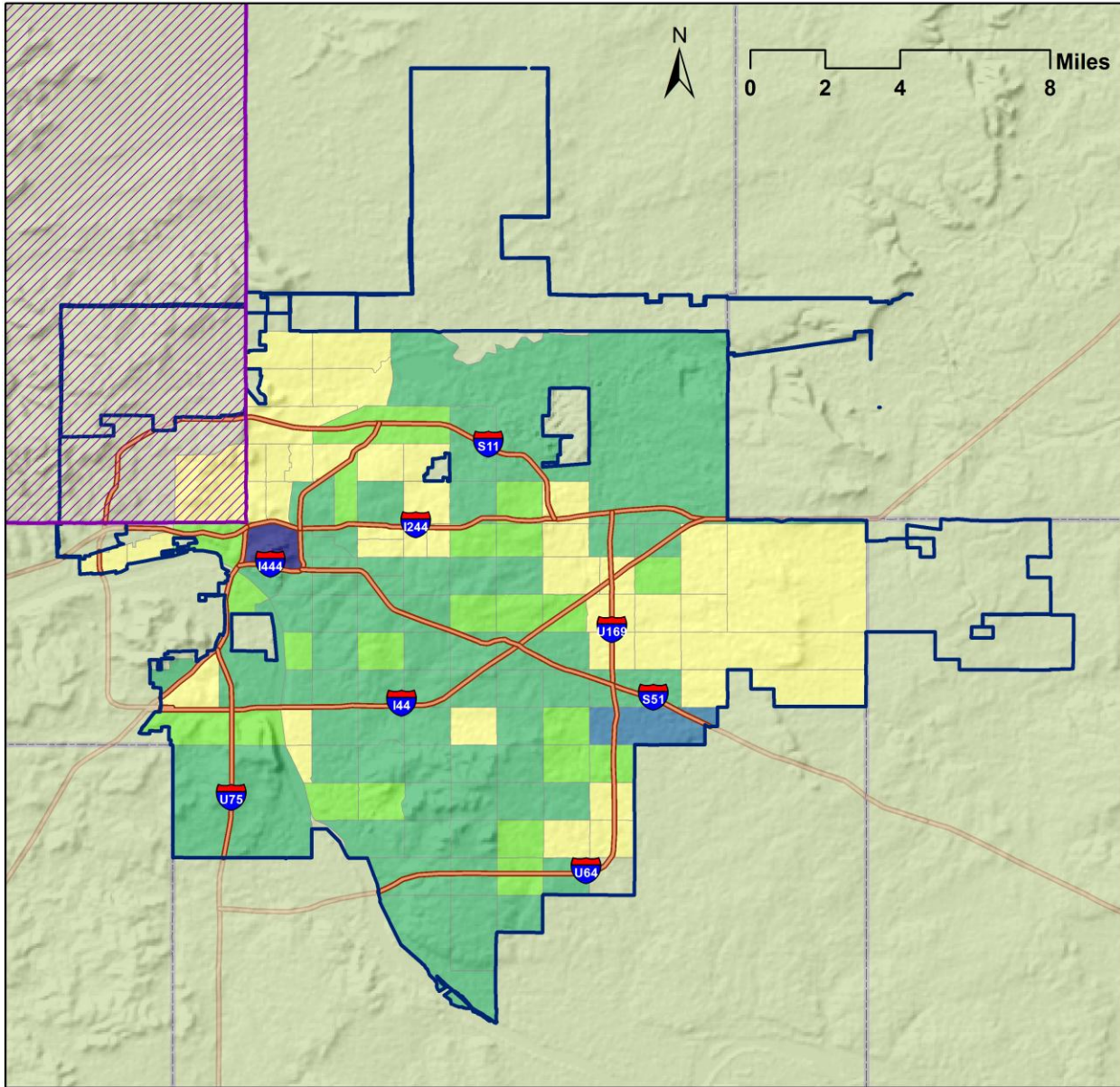
U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

HUD maintains records of complaints that represent potential and actual violations of federal housing law, as described previously in the Complaint Process Review. Tulsa residents lodged 202 complaints with HUD from the beginning of 2004 through August 2014. These complaints are presented in Table V.11 below, categorized by complaint basis, or the protected class of the recipient. Complaints on the basis of disability were most common, cited in 113 complaints. Next were complaints on the basis of race, lodged in 84 complaints. Familial status was cited in 20 complaints, or approximately ten percent. Because complainants may cite more than one basis in complaints lodged with HUD, a total of 252 bases were cited in all of the complaints lodged over the time period.

Table V.11
Fair Housing Complaints by Basis
 City of Tulsa
 2004–2014 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	Total
Disability	13	12	12	10	10	10	12	8	13	6	7	113
Race	15	11	8	8	8	6	9	8	7	3	1	84
Family Status	5				2	5	1	3	2	1	1	20
Sex	3		1	1	1			2	1	1	2	12
Retaliation		5	1	2			1	1			1	11
National Origin	2			1		1		2		1		7
Religion	2	1					1	1				5
Total Bases	40	29	22	22	21	22	24	25	23	12	12	252
Total Complaints	31	22	18	18	19	17	21	19	18	9	10	202




Map V.10
Amount of Small Business Loan Dollars Per Resident, 2000-2011
 City of Tulsa
 2000-2012 CRA Data








Legend

2000-2011 Dollar Value of Small Business Loans

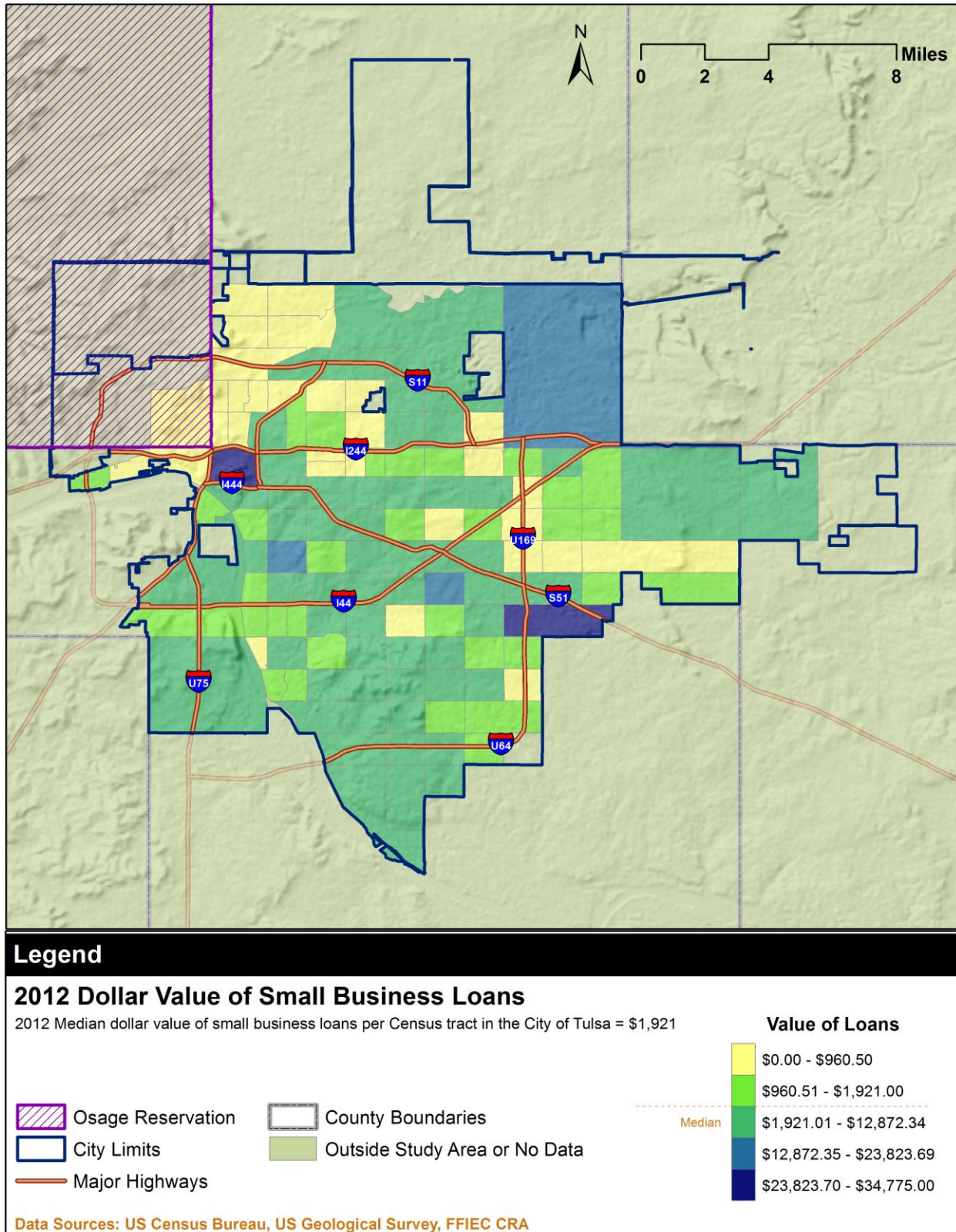
2000-2011 Median dollar value of small business loans per Census tract in the City of Tulsa = \$36,961

-  Osage Reservation
-  City Limits
-  Major Highways
-  County Boundaries
-  Outside Study Area or No Data

Value of Loans	
	\$1,010.00 - \$18,985.50
	\$18,985.51 - \$36,961.00
	\$36,961.01 - \$219,563.34
	\$219,563.35 - \$402,165.69
	\$402,165.70 - \$584,768.00

Data Sources: US Census Bureau, US Geological Survey, FFIEC CRA

Map V.11
Amount of Small Business Loan Dollars Per Resident, 2012
 City of Tulsa
 2012 CRA Data



Complaints may also be categorized by issue, or the alleged discriminatory action, as shown in Table V.12 below. As in the case of complaint basis, more than one issue may be cited in connection with each complaint. The most common discriminatory issue was discriminatory terms, conditions, privileges, or services and facilities, which was cited in 113 complaints. The next most common issues were discrimination in terms, conditions or privileges relating to rental; along with failure to make reasonable accommodation; which were cited in 55 and 54 complaints, respectively. A complete version of this table with yearly complaint data is included in Appendix D as Table D.2.

Table V.12
Fair Housing Complaints by Issue
 City of Tulsa
 2004–2014 HUD Data

Issue	Total
Discriminatory terms, conditions, privileges, or services and facilities	113
Discrimination in term, conditions or privileges relating to rental	55
Failure to make reasonable accommodation	54
Discriminatory acts under Section 818 (coercion, etc.)	38
Discriminatory refusal to rent	29
Discriminatory refusal to rent and negotiate for rental	27
Non-compliance with design and construction requirements (handicap)	7
Failure to permit reasonable modification	7
Discriminatory financing (includes real estate transactions)	4
Otherwise deny or make housing available	4
Other discriminatory acts	4
Discriminatory advertising, statements and notices	3
Discriminatory refusal to negotiate for rental	2
Discrimination in making of loans	2
Discrimination in the terms or conditions for making loans	2
Discrimination in terms, conditions, privileges relating to sale	2
Steering	2
Discriminatory refusal to sell and negotiate for sale	1
False denial or representation of availability	1
Discrimination in services and facilities relating to sale	1
Failure to provide an accessible route into and thru the covered unit	1
Total Issues	359
Total Complaints	202

Table V.13 below presents the closure status, or outcome, of complaints lodged with HUD over the time period. Nearly half of these complaints were found to have no cause, while 47 were conciliated, 28 ended in an administrative closure, and 18 were withdrawn after resolution.

Table V.13
Fair Housing Complaints by Closure Status
 City of Tulsa
 2004–2014 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	Total
No Cause	12	9	11	11	9	10	15	6	8	1	2	94
Conciliated / Settled	12	6	3	2	6	4	4	5	3	1	1	47
Administrative Closure	7	3	1	3	3	3		3	3	1	1	28
Withdrawal After Resolution		3	3	2	1		1	4	1	3		18
Cause (FHAP)		1					1					2
Open								1	3	3	6	13
Total Complaints	31	22	18	18	19	17	21	19	18	9	10	202

Table V.14 below presents a summary of complaints, by basis, considered to have cause. For the purposes of this study, such complaints include those that were conciliated or withdrawn after resolution, as well as those that were found to have cause after a HUD investigation. As in the case of complaints more generally, disability was the most common basis for complaints considered to have cause in those 67 complaints, followed by race. These bases were cited in 42 and 23 complaints, respectively.

Table V.14
Fair Housing Complaints Found With Cause by Basis
City of Tulsa
2004–2014 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	Total
Disability	7	7	5	4	4	2	3	3	4	2	1	42
Race	4	4	2		3	1	3	4		2		23
Retaliation		2		1				1				4
National Origin	1					1		1				3
Family Status					1			1				2
Sex								1		1		2
Religion	1											1
Total Bases	13	13	7	5	8	4	6	11	4	5	1	77
Total Complaints	12	10	6	4	7	4	6	9	4	4	1	67

The three most common discriminatory issues cited in complaints considered to have cause were the same as those cited in complaints in general, as shown in Table V.15 on the following page. Discrimination in terms, conditions, privileges, or services and facilities was the most common discriminatory issue, followed by failure to make reasonable accommodation. Discrimination in terms, conditions or privileges relating to rental, which had been the second most common issue in complaints in general, was third most common in complaints considered to have cause. A complete version of the Table is included in Appendix D as Table D.3.

Table V.15
Fair Housing Complaints Found With Cause by Issue
 City of Tulsa
 2004–2014 HUD Data

Issue	Total
Discriminatory terms, conditions, privileges, or services and facilities	35
Failure to make reasonable accommodation	24
Discrimination in term, conditions or privileges relating to rental	21
Discriminatory refusal to rent and negotiate for rental	8
Discriminatory acts under Section 818 (coercion, etc.)	8
Discriminatory refusal to rent	6
Non-compliance with design and construction requirements (handicap)	2
Failure to permit reasonable modification	2
Discrimination in making of loans	1
Steering	1
Total Issues	108
Total Complaints	67

TULSA HUMAN RIGHTS DEPARTMENT

The City of Tulsa Human Rights Department received 55 complaints from Tulsa residents from the beginning of 2004 through September 2014. Table V.16 below presents the discriminatory bases cited in these complaints. As with the HUD complaints from a similar period, those based on disability and race were the most common, cited in 34 and 17 complaints, respectively.

Table V.16
Complaints by Year
 City of Tulsa
 City of Tulsa Human Rights Department 2004 - 2014

Complaint	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	Total
Disability Discrimination	1	2	5	6	6	9	5	34
Race Discrimination	4	4	.	.	.	2	2	2	1	1	1	17
Familial Status	2	2
Age Discrimination	1	1
Race & Familial Status	1	1
Total	5	4	.	.	1	4	10	8	7	10	6	55

Table V.17 on the following page presents the outcome of complaints lodged with the Human Rights Department. Fifteen complaints were dismissed due to the lack of response from the complaining party, and a further 13 were found to have no probable cause. Of the remainder, 17 were settled or referred to another agency. It would appear that this complaint avenue is used far less often than others. A complete version of the Table is included in Appendix D as Table D.4.

**Table V.17
Outcome by Year**

City of Tulsa
City of Tulsa Human Rights Department 2004 - 2014

Outcome	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	Total
Dismissed, non-response from CP	1	1	.	4	2	4	3	15
No Probable Cause	.	2	3	2	2	2	2	13
Dismissed, pursued by HUD	5	5
Referred to HUD	3	.	.	1	.	4
Referred to Early Settlements	1	1	1	.	.	3
RP to meet accommodations	1	2	.	3
Bradford Creek Apts.	1	1	.	.	2
Referred to OK Human Rights Comm.	2	2
CP settled with management	1	1
Dismissed, referred to Fair Housing Council	1	1
No Probable Cause, no ADA violation	1	1
On-Going	1	1
Referred to Public Works Dept.	1	.	1
RP agreed to 16 days compensation	1	1
Settled for \$775.00 from RP	.	1	1
Missing	.	1	1
Total	5	4	.	.	1	4	10	8	7	10	6	55

METROPOLITAN FAIR HOUSING COUNCIL

The Metropolitan Fair Housing Council (MFHC) provided data on 28 complaints that it had referred to HUD from 2011 through the end of July 2014, along with the outcome of 17 requests for reasonable accommodation, and a breakdown of 76 fair housing tests conducted in the city. Table V.18 below summarizes the 28 complaints referred to HUD by the basis of those complaints. More than half of these complaints were referred to HUD in 2012, a year in which a majority of complaints were based on race. Disability and race were again the most common bases in all complaints MFHC filed with HUD from 2011 through 2014, each cited in 12 complaints.

**Table V.18
Basis of Housing Discrimination Complaints Filed with HUD
Region VI - FHEO**

City of Tulsa
Metropolitan Fair Housing Council of Oklahoma, Inc.

Basis	2011	2012	2013	2014	Total
Disability	4	3	3	2	12
Race	0	8	2	2	12
Sex	0	2	1	0	3
Familial Status	0	1	0	0	1
Total	4	14	6	4	28

The outcome of those 28 complaints is presented in Table V.19 below. As shown, seven complaints referred to HUD were determined to have no cause, five were terminated due to loss of contact with the complainant, and four were determined to be outside HUD’s jurisdiction⁴⁹. Only three of the 28 complaints were ultimately resolved to the benefit of the complainant, though several were pending or still open as of the end of July 2014.

Table V.19
Status of Housing Discrimination Complaints Filed with HUD Region VI - FHEO
 City of Tulsa
 Metropolitan Fair Housing Council of Oklahoma, Inc.

Status	2011	2012	2013	2014	Total
No Cause Determination	3	3	1	0	7
Complaint Open-Ongoing at HUD	1	1	1	2	5
Lost contact with Complainant/Unable to Locate	0	5	0	0	5
HUD Reviewed/Not Jurisdictional	0	2	2	0	4
Pending at HUD	0	0	0	2	2
Closed by HUD	0	0	1	0	1
Lost Contact with Complainant	0	1	0	0	1
MFHC Mediated RA with Resolution –Client Withdrew HUD 903	0	1	0	0	1
Settled - HUD Conciliation \$1,500	0	0	1	0	1
Settled-HUD Conciliation \$88.00 with Resolution	0	1	0	0	1
Total	4	14	6	4	28

As noted, the MFHC also provided data on 17 reasonable accommodation requests by Tulsa residents from 2011 through July 2014. As shown in Table V.20 below, ten of these were granted and seven were denied. As shown in Table V.21 on the following page, ten cases were ultimately closed, as these were the cases in which the reasonable accommodation request was granted. Among the seven cases that were denied, six have been referred to HUD in the form of a fair housing complaint.

Table V.20
Outcome of Requests for Reasonable Accommodation or Modification
 City of Tulsa
 Metropolitan Fair Housing Council of Oklahoma, Inc.

Outcome	2011	2012	2013	Total
Denied	3	1	3	7
Granted	2	5	3	10
Total	5	6	6	17

⁴⁹ HUD may consider a complaint to be beyond its jurisdiction if it determines the complaint does not involve housing discrimination.

Table V.21
Status of Requests for Reasonable Accommodation or Modification

City of Tulsa
 Metropolitan Fair Housing Council of Oklahoma, Inc.

Status	2011	2012	2013	Total
Case Closed	2	5	3	10
HUD 903 Filed	3	0	3	6
Lost Interest/Case Closed	0	1	0	1
Total	5	6	6	17

Finally, the MFHC provided data on 76 fair housing tests it conducted in the city from March 2011 through the end of July 2014. Nearly half of these were conducted to probe for discrimination on the basis of handicap, and 29 were conducted on the basis of familial status, as shown in Table V.22 below. Likewise, nearly half of these tests were conducted in the rental housing market, and 34 concerned accessibility and disability issues.

Table V.22
Tests Conducted by Basis and Issue

City of Tulsa
 Metropolitan Fair Housing Council of Oklahoma, Inc.

Breakdown of Cases by Basis		Breakdown of Cases by Issue	
Protected Basis	Total Number	Type of Complaint	Number
Race	4	Rental	38
Religion	0	Sales	4
Color	0	Advertising	0
Sex	5	Lending (including redlining)	0
Handicap	38	Insurance	0
National Origin	0	Accessibility/Disability Issues	34
Familial Status	29	Zoning: Other Issues	0
Total	76	Total	76

FAIR HOUSING SURVEY – PRIVATE SECTOR RESULTS

Additional evaluation of fair housing within the City of Tulsa was conducted via an online survey of stakeholders that began in June of 2014. The purpose of the survey, a relatively qualitative component of the AI, was to gather insight into the knowledge, experiences, opinions, and feelings of stakeholders and interested citizens regarding fair housing. Results and comments related to the questions in the private sector are presented in the following narrative, and additional survey results are discussed in **Sections VI** and **VII**.

The 2015 City of Tulsa Fair Housing Survey was completed by 202 persons and was conducted entirely online. Individuals solicited for participation included representatives of housing groups, minority organizations, disability resource groups, real estate and property management associations, banking entities, and other groups involved in the fair housing arena. Most questions in the survey required simple “yes,” “no,” or “don’t know” responses, although many questions allowed the respondent to offer written comments. When many

respondents reported that they were aware of questionable practices or barriers, or when multiple narrative responses indicated similar issues, findings suggested likely impediments to fair housing choice.

Numerical tallies of results and summaries of some comment-driven questions are presented in this section. A complete list of written responses is available in Appendix B.

FAIR HOUSING IN THE PRIVATE SECTOR

In order to address perceptions of fair housing in the City of Tulsa’s private housing sector, survey respondents were asked to identify their awareness of possible housing discrimination issues in a number of areas within the private housing sector, including the:

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

If respondents indicated that they were aware of possible discriminatory issues in any of these areas, they were asked to further describe issues in a narrative fashion. Tallies for each question are presented below in Table V.23. As shown, nearly 31 percent of respondents professed to be aware of barriers to fair housing choice in the rental housing market, more than a quarter were aware of barriers to fair housing choice in the real estate industry, and over a fifth had noted barriers to fair housing choice in the mortgage and home lending industry. By contrast, less than 15 percent of respondents were aware of any barriers to fair housing choice in the home appraisal industry, and fewer still were aware of such barriers in the housing construction or accessible design field (in spite of the frequency of housing complaints based on disability), the home insurance industry, or any other housing services. Note that these latter questions attracted a larger share of respondents who answered “don’t know” than the first three questions.

Table V.23
Barriers to Fair Housing in the Private Sector
 City of Tulsa
 2015 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
The rental housing market?	37	49	31	85	202
The real estate industry?	32	39	46	85	202
The mortgage and home lending industry?	27	40	49	86	202
The housing construction or accessible housing design fields?	13	47	58	84	202
The home insurance industry?	11	41	59	91	202
The home appraisal industry?	16	40	60	86	202
Any other housing services?	10	41	65	86	202

Perceived discrimination on the basis of race and familial status figured prominently in commentary on barriers to fair housing choice in the rental, real estate, and home mortgage

markets. Such discrimination took the form of tacit refusal to rent to racial minorities and families with children, steering in the real estate market, and differential treatment in home lending on the basis of race, according to commenters. Commenters also perceived barriers to fair housing choice in the failure to incorporate accessibility as a criterion in housing design and construction (as well as in infrastructure such as sidewalks). A series of tables that include commentary from the private sector portion of the fair housing survey is included in Appendix B.

SUMMARY

Tulsans and prospective Tulsans applied for 35,946 home purchase loans from 2008 through 2012. Over 90 percent of these loan applications were for housing units in which the applicants intended to live; these loans are designated “owner-occupied” home purchase loans. Just over 13 percent of these owner-occupied home purchase loans were denied over the five-year period. Loan applications more frequently ended in denial in the northern portion of the city, particularly in the area north of Interstate 244. Denial rates also varied considerably by gender, race, and ethnicity: 13.5 percent of female applicants were denied loans from 2008 through 2012, compared to a denial rate of 12 percent for male applicants. Similarly, more than 22 percent of loan applications from black applicants were denied compared to a denial rate of 7.2 percent for white applicants. Meanwhile, the denial rate for Hispanic applicants exceeded that of non-Hispanic applicants by over ten percentage points. Black applicants tended to be denied more frequently in Census tracts outside of the area in which black residents were highly concentrated, notably in the city center and areas to the northeast of the city center. Hispanic residents were subject to high rates of loan denials in areas throughout the northern part of the city. As one might expect, the rate of loan denials fell as the income of the applicant increased; however, applicants of different races and ethnicities continued to be subject to different denial rates, even when they were similarly situated with respect to income.

Those applicants who were able to secure a home purchase loan were sometimes issued loans with high annual percentage rates (HALs). In all, 4.5 percent of borrowers paid interest rates on those loans that exceeded treasury rates for comparable loans by three percentage points. The incidence of such predatory style lending dropped considerably after 2008. In keeping with trends in loan denials was the impact of race and ethnicity on HAL rates: 7.6 percent of loans issued to black residents were HALs, and 6.2 percent of loans issued to Hispanic residents were predatory in nature. By comparison, the HAL rates for white and non-Hispanic residents were 4.4 and 4.3 percent, respectively. Borrowers in general were more likely to be issued HALs in the area to the north and northeast of the city center, which held relatively high concentrations of black and Hispanic residents. Black residents tended to be issued HALs outside of areas with high concentrations of black residents, while Hispanic residents were often subject to high rates of predatory style lending in areas with high concentrations of Hispanic residents.

Small business lending in the city was observed to vary considerably according to the median income of the Census tracts in which these loans were issued. Less than four percent of the small business loans reported under the Community Reinvestment Act (CRA) were issued in tracts in which the median family income was less than half of that of the area as a whole. By contrast, nearly half of these loans were issued in Census tracts with median incomes at or above 120 percent of the area median. The city center was the target of considerable

investment, as was a large Census tract that lay along the Broken Arrow Corridor. By contrast, relatively few small business loans were issued to the north of the city center.

HUD, the Tulsa Human Rights Department, and the Metropolitan Fair Housing Council all provided data on complaints that they received from city residents. More than half of the complaints that HUD received during the period from 2004 through August 2014 cited discrimination on the basis of disability, or 113 complaints. Race was the second most common complaint basis, and was cited in 84 complaints. Failure to make reasonable accommodation was a common allegation in these complaints, as were allegations of discrimination in the rental housing market. Disability and race were also the most common bases for complaints lodged with the Human Rights Department and the Metropolitan Fair Housing Council.

The perception of discrimination in the rental housing market was also relatively common among respondents to the 2015 City of Tulsa Fair Housing Survey. Around 30 percent of respondents reported being aware of discrimination in that area, while a quarter of respondents maintained that they were aware of discrimination in the real estate industry and around 20 percent had perceived discrimination in the mortgage and home lending industry. Specific violations of fair housing policy cited by survey respondents included tacit refusal to rent to racial minorities and families with children, steering in the real estate market, and differential treatment in home lending on the basis of race. In addition, survey respondents noted a failure on the part of housing designers and builders to include accessible features in new housing units.

SECTION VI. FAIR HOUSING IN THE PUBLIC SECTOR

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

PUBLIC SERVICES

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

MULTI-FAMILY ASSISTED HOUSING UNITS

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

Map VI.1 on the following page shows the distribution of assisted housing units throughout the city, and the geographic relationship between those units, public transportation networks, and areas that the City of Tulsa has identified as "employment centers", areas with relatively high concentrations of new jobs. Though subsidized units of all types were distributed throughout the city, they tended to be located in areas with above-average and disproportionate poverty rates. In addition, these units were often clustered in Census tracts with relatively high concentrations of black and Hispanic residents. These units were generally located close to public transit routes, though many of them were not directly connected by public transit to employment centers in the city. Furthermore, the Cherokee Industrial area and Port of Catoosa are outside of the Tulsa transit network. This suggests that those who live in subsidized housing, and who may rely on public transit, are likely to be limited in their employment opportunities, particularly if they work several jobs and must travel to different parts of the city during the day.

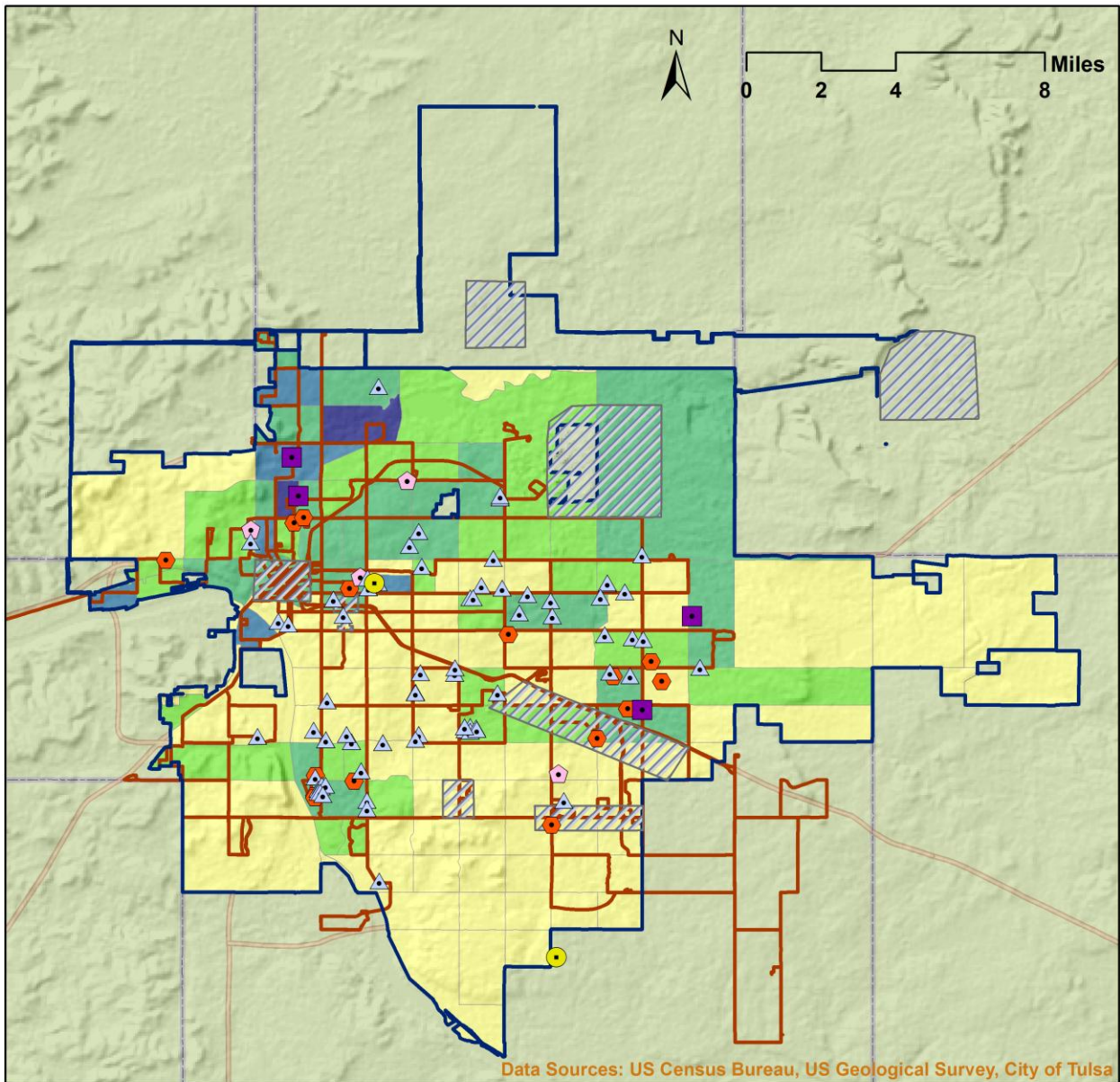
Tulsa Housing Authority's Deconcentration Policy

The Tulsa Housing Authority (THA) encourages the deconcentration of poverty and the development of mixed-income neighborhoods through several the provisions of its deconcentration policy, which is included in this document as Appendix F. One of the goals of the policy is to avoid directing higher income public housing recipients toward higher income Census tracts, and lower income recipients toward lower income Census tracts, by placing households with lower incomes in public housing units in higher income Census tracts, and vice versa. In addition, the policy provides for incentives to encourage families whose income would help meet the deconcentration goal to apply for public housing. It is the overall policy of the THA that each of these provisions, as well as the deconcentration policy as a whole, be administered in a uniform and non-discriminating manner. The policy covers "developments with incomes within the range of 85 to 115 percent of the average incomes of all [public housing] developments, with the upper range not being less than the limit at which a family would be defined as extremely low income."

FAIR HOUSING SURVEY – PUBLIC SECTOR RESULTS

As mentioned previously, further evaluation of the status of fair housing within City of Tulsa was conducted via an online 2015 Fair Housing Survey, which was completed by 202 stakeholders and citizens. Those solicited for participation included a wide variety of individuals in the fair housing arena. Most questions in the survey required "yes," "no," or "don't know" responses, and many allowed the respondent to offer written comments. While the numerical tallies of results are presented in this section, along with summaries of some comment-heavy questions, a complete list of written responses is available in Appendix B. Other survey results are also discussed in **Sections V** and **VII**.

Map VI.1
Multi-Family Assisted Housing Units
 City of Tulsa
 2013 HUD Data



Data Sources: US Census Bureau, US Geological Survey, City of Tulsa

Legend

Assisted Units, Employment Centers, and Poverty

2008-2012 Average poverty rate in the City of Tulsa = 19.7%
 Disproportionate share threshold = 29.7% (A disproportionate share exists where the poverty rate in a given Census tract is 10 percentage points higher than the study area average.)

- Public Transit Routes
- Employment Centers
- City Limits
- County Boundaries
- Outside Study Area or No Data

- Project Based Section 8
- LIHTC
- LIHTC and Project Based Section 8
- Housing Choice Vouchers
- Other

Poverty Rates

- 0.4% - 19.7%
- 19.8% - 29.7%
- 29.8% - 41.9%
- 42% - 54.2%
- 54.3% - 66.4%

Disproportionate Share Threshold

FAIR HOUSING IN THE PUBLIC SECTOR

Public sector effects on housing can be complex and varied. The questions in this section of the survey asked respondents to think about possible barriers to fair housing choice within very specific areas of the public sector, as follows:

- Land use policies,
- Zoning laws,
- Occupancy standards or health and safety codes,
- Property tax policies,
- Permitting processes,
- Housing construction standards,
- Neighborhood or community development policies,
- Access to government services, and
- Any other public administrative actions or regulations.

If respondents affirmed that they were aware of possible discriminatory issues in any of these areas, they were asked to further describe issues in a narrative fashion. Tallies for each question are presented in Table VI.1 below. In the public housing sector, just over a fifth of survey respondents perceived barriers to fair housing choice in land use and zoning policies, occupancy standards or health and safety codes, and public administrative actions or regulations, as shown in Table VI.1. More salient still were the problems associated with limited access to government service: more than 43 percent of respondents professed to be aware of barriers to fair housing choice in this area, many of whom cited limitations of public transportation as a city-wide challenge. However, of potentially greater impact still is the quality of the city's school districts: just under 64 percent of respondents affirmed that the quality of a school district impacts where households choose to live. Relatively few respondents claimed to be aware of policies or practices that represent barriers to fair housing choice in property tax policies, the permitting process, or housing construction standards, and around 17 percent of respondents perceived barriers to fair housing choice in neighborhood or community development policies.

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

City of Tulsa
2015 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
Land use policies?	24	37	50	91	202
Zoning laws?	23	32	56	91	202
Occupancy standards or health and safety codes?	24	37	48	93	202
Property tax policies?	10	40	61	91	202
Permitting process?	14	39	58	91	202
Housing construction standards?	9	40	62	91	202
Neighborhood or community development policies?	18	38	54	92	202
Limited access to government services, such as transportation or employment services?	46	26	36	94	202
Does the quality of the local public school district affect the location of where households choose to live?	70	14	26	91	201
Public administrative actions or regulations?	24	23	65	90	202

According to commentary submitted with responses to the public sector portion of the survey, many policies and laws in the public sector serve to concentrate affordable housing in particular areas and to exclude it from others. Land use policies and zoning laws were of particular concern in this connection, and are perceived to be influenced by neighborhood opposition to multifamily housing and NIMBYism. However, the perceived aversion to multifamily housing was not necessarily limited to particular areas, according to respondents who maintained that multifamily housing is discouraged throughout the city in favor of single-family development. In addition, public transportation was widely considered to be insufficient for the needs of Tulsa residents, and to represent a further barrier to housing choice, particularly for those who have limited personal transportation options. A series of tables that include commentary from the public sector portion of the fair housing survey is included in Appendix B.

SUMMARY

The review of fair housing in the public sector involved an examination of the distribution of subsidized housing units in the city, as well as the extent of the public transit network and the location of employment centers, along with analysis of the results of the 2015 Fair Housing Survey. Subsidized housing units tended to be located near areas with above-average poverty rates and concentrations of black and Hispanic residents, and were often not well-connected by public transit to the city's employment centers. In fact, the perceived shortcomings of the transit system was a subject of wide agreement on the part of survey respondents: 43 percent of respondents claimed to be aware of barriers to fair housing choice in the provision of government services in the city, and many who provided additional commentary cited the limitations of the transit system as a barrier to those with limited personal transportation options. In addition, survey respondents perceived the influence of NIMBYism in zoning and land-use laws in the city, and maintained that neighborhood opposition to affordable and subsidized units represented a barrier to fair housing choice in the city.

SECTION VII. PUBLIC INVOLVEMENT

This section discusses analysis of fair housing in the City of Tulsa as gathered from various public involvement efforts conducted as part of the AI process. Public involvement feedback is a valuable source of qualitative data about impediments, but, as with any data source, citizen comments alone do not necessarily establish the existence of citywide impediments to fair housing choice. However, survey and forum comments that support findings from other parts of the analysis reinforce findings from other data sources concerning impediments to fair housing choice.

FAIR HOUSING SURVEY

As discussed in previous sections, the 2015 Fair Housing Survey comprised a large portion of the public involvement efforts associated with the development of the 2015 AI. While data from the survey regarding policies and practices within the private and public sectors have already been discussed, the remaining survey findings are presented below.

The purpose of the 2015 Fair Housing Survey, a relatively qualitative component of the AI, was to gather insight into knowledge, experiences, opinions, and feelings of stakeholders and interested citizens regarding fair housing as well as to gauge the ability of informed and interested parties to understand and affirmatively further fair housing. Many organizations throughout the city were solicited to participate.

A total of 202 persons in the City of Tulsa completed the survey, which was conducted entirely online. An identical version of the survey was also offered in Spanish, but only one response was received. A complete list of responses is included in Appendix B. Other survey results are also discussed in **Sections V and VI**.

Respondents of the 2015 Fair Housing Survey were asked to identify their primary role within the housing industry. As shown in Table VII.1 at right, apart from those who identified their role as “other”, the most common survey respondents were advocates or service providers, who accounted for approximately a quarter of respondents. In addition, seventeen respondents worked in property management, 16 were service providers, and 11 were local government officials.

Survey respondents were also asked to identify themselves as either homeowners or renters. As shown in Table VII.2 on the following page, 139 respondents identified themselves as homeowners; approximately 71 percent of respondents (again omitting missing responses). Nearly a quarter of respondents were renters, and 10 selected “Other” in response to this question.

Table VII.1
Role of Respondent

City of Tulsa
2015 Fair Housing Survey Data

Primary Role	Total
Other Role	59
Advocate/Service Provider	54
Missing	27
Property Management	17
Service Provider	16
Local Government	11
Law/Legal Services	8
Construction/Development	7
Appraisal	2
Homeowner	1
Banking/Finance	
Insurance	
Real Estate	
Renter/Tenant	
Total	202

Table VII.2
Are you a homeowner or renter?

City of Tulsa
 2015 Fair Housing Survey Data

Tenure	Total
Homeowner	139
Renter	47
Other	10
Missing	6
Total	202

Respondents were also asked to assess their own familiarity with fair housing laws. As shown in Table VII.3 below, 31 respondents professed to be unfamiliar with fair housing laws, while 68 respondents were “somewhat familiar” and 35 were “very familiar”. Those who were “somewhat” or “very” familiar with fair housing laws accounted for about 75 percent of those who answered this question.

Table VII.3
How Familiar are you with Fair Housing Laws?

City of Tulsa
 2015 Fair Housing Survey Data

Familiarity	Total
Not Familiar	33
Somewhat Familiar	68
Very Familiar	35
Missing	66
Total	202

Table VII.4 on the following page presents the results of a series of questions concerning the current level of fair housing activities in the local community. When asked if they were aware of a training process to learn about fair housing laws, 44 replied “yes”, 64 replied “no”, and 17 replied with “don’t know”. Thirty-nine respondents had participated in fair housing training, while 36 had not (77 respondents did not respond to this question). Less than a fifth of respondents were aware of any fair housing testing.

As one might expect, given the relatively high percentages of respondents who were unaware of fair housing training opportunities or fair housing testing, large shares of respondents felt that current levels of testing and education were insufficient. Sixty-two respondents, or around half, felt that there was too little in the way of fair housing outreach and education, while 20 felt current levels were appropriate, only one felt that current levels of outreach and education were excessive. Likewise, 36 respondents felt that current levels of fair housing testing were insufficient, 7 felt that they were appropriate, and only 2 felt that they were excessive.

Table VII.4
Fair Housing Activities
 City of Tulsa
 2015 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total	
Is there a training process available to learn about fair housing laws?	44	64	17	77	202	
Have you participated in fair housing training?	39	36	3	124	202	
Are you aware of any fair housing testing?	22	84	21	75	202	
Testing and education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity?	62	20	1	43	76	202
Is there sufficient testing?	36	7	2	81	76	202

The results of the survey also revealed that respondents were generally supportive of fair housing laws: as shown in Table VII.5 below, 99 respondents maintained that fair housing laws are useful, while only 13 felt that they were not useful. However, 40 respondents maintained that such laws are difficult to follow, or around 30 percent of respondents. There was also considerable support for expanding fair housing protections to additional groups, notably including protections based on sexual orientation. Finally, a majority of respondents felt that fair housing laws are not adequately enforced, omitting missing responses.

Table VII.5
Federal, State, and Local Fair Housing Laws
 City of Tulsa
 2015 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total
Do you think fair housing laws are useful?	99	13	22	68	202
Are fair housing laws difficult to understand or follow?	40	58	34	70	202
Do you think additional groups should be protected under the State fair housing law?	45	44	45	68	202
Do you think fair housing laws are adequately enforced?	44	64	17	77	202

As part of the process of measuring understanding of fair housing law through the survey instrument, respondents were asked to list their awareness of classes of persons protected by fair housing laws on federal, city, and local levels. Race and disability were offered as examples of protected classes in the question narrative, and respondents were encouraged to continue on and list other protected classes. Results of this question are presented at right in Table VII.6. Some respondents were able to correctly identify several of the protected classes, including familial status, religion, gender, national origin, and color. Few respondents identified groups as “protected” that are not, in fact, protected by any of the laws applicable to the City of Tulsa. Exceptions included the 18 respondents who incorrectly identified sexual orientation as a protected class, 14 who cited income as a protected class, and the 4 respondents who identified military as a protected class.

Table VII.6
Protected Classes

City of Tulsa
 2015 Fair Housing Survey Data

Protected Class	Total
Gender	62
Religion	59
Family Status	42
National Origin	39
Age	33
Other	30
Color	24
Sexual Orientation	18
Income	14
Disability	8
Ethnicity	6
Military	4
Ancestry	2
Race	1
Criminal History	0
Total	347

Finally, survey respondents were asked concluding questions concerning local fair housing laws and challenges. As shown in Table VII.7 on the following page, twenty-four respondents stated that they were aware of a local fair housing ordinance,

regulation or plan, around 24 percent of respondents. More than three-quarters of respondents stated that they were not aware of such a plan, or responded “Don’t know”. Thirty-two respondents were aware of specific geographical areas with fair housing policies: specific areas identified in additional commentary are included in Appendix B, and prominently include east, west, and north Tulsa. Additional commentary from the concluding portion of the survey is also included in Appendix B.

Table VII.7
Local Fair Housing
City of Tulsa
2015 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any city or county fair housing ordinance, regulation, or plan?	24	55	22	95	196
Are there any specific geographic areas that have fair housing problems?	32	16	53	95	196

Respondents were also asked to offer any additional comments that they might have regarding fair housing in their communities. Respondents who provided such commentary cited a need to promote affordable housing in more areas, the potential for more fair housing violations in rural areas, and inadequate enforcement of accessibility and reasonable accommodation requirements, which serves as a barrier to housing choice among members of the population with disabilities.

FAIR HOUSING FORUM

FAIR HOUSING FORUM

One fair housing forum was held in City of Tulsa on October 8, 2014 at 3:00PM. The purpose of the presentation and subsequent discussion was to provide the public with an opportunity to learn more about the AI process and why it was conducted, and to share preliminary findings from the study. The complete minutes from the meeting are presented in Appendix C. Discussions at the forum covered a diverse set of topics, though there were several dominant themes. These themes include the following:

- The need to adopt more widespread inclusionary zoning, and challenges associated with implementing such zoning
- The need for an updated fair housing policy at the city level
- Potential actions the city may take to address NIMBYism
- Economic challenges in North Tulsa and ongoing revitalization efforts in that area

PRESENTATION OF DRAFT AI BEFORE THE CITY COUNCIL

The findings of the AI were presented to the city council on February 12, 2015 by a representative of the City of Tulsa Human Rights Department. The draft minutes from the February 12th meeting are included in Appendix F.

SUMMARY

Public input during the 2015 AI process was sought through the solicitation of citizen participation in the 2015 Fair Housing Survey, along with the Fair Housing Forum held in the city in October of 2014. Those who participated in the survey were generally supportive of the goals of fair housing laws and policies, though many felt that the laws are difficult to understand or follow. Furthermore, many respondents felt that current fair housing laws are not sufficiently enforced, and need to be expanded to include protections based on sexual orientation. Survey respondents were also largely unaware of local fair housing laws or plans, though many were aware of specific geographic areas that they considered to have significant fair housing problems, including north, west, and south Tulsa. Participants in the October Fair Housing Forum highlighted several challenges to fair housing policy in the city, including NIMBYism, the need to promote inclusionary zoning, the need to update the city's fair housing policy, and economic challenges facing north Tulsa. Finally, the findings from the AI process were presented to the city council on February 20, 2015.

SECTION VIII. SUMMARY OF FINDINGS

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

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

Socio-Economic Context

For the first few years after 2000, the population of Tulsa was in decline. However, thanks to strong growth after 2005, the city's population had nearly rebounded to 2000 levels by 2010. This was largely due to an increase the number of residents aged 55 to 64, along with a slight increase in the number of residents aged less than five years. The number of residents in all other age groups decreased, though in the case of residents aged over 65, that overall decline masked a modest increase in the number of residents aged 65 to 66 and 85 or over. Residents aged 35 to 54 accounted for the largest share of residents in 2010 at around a quarter of the population. However, even this relatively large share represented a decline from 28.3 percent in 2000.

White residents accounted for the largest share of the overall population in 2000 and 2010; however, this share became smaller over the decade as the number of white residents in the city fell by 11 percent. The number of black residents grew slightly, and black residents retained roughly the same share of the overall population between Census counts. Hispanic residents, on the other hand, nearly doubled in number and as a share of the overall population, representing 14.1 percent of the city's residents in 2010. In 2000 and 2010, black and Hispanic residents were observed to be concentrated to the north and northeast of the city center, respectively.

Residents with disabilities accounted for 20.5 percent of the population in 2000. In that year, residents with disabilities tended to live close to the city center, particularly in areas to the

north and east of the city center. In 2008-2012, 14.8 percent of the population was living with some form of disability⁵⁰.

The number of employed persons in the city fell steadily after 2000, and continued to do so until around 2005. By contrast, the labor force grew from 2000 through 2002, contributing to growth in the unemployment rate, which peaked in 2003 at 6.6 percent. After 2003, the unemployment rate began to fall; however, it increased dramatically in 2009 as approximately 7,000 workers lost their jobs. The unemployment rate continued to rise through 2010, peaking at 7.3 percent in that year. The number of employed persons in the city began to increase after that year; however, the number of full- and part-time jobs in the county did not begin to grow again until the following year.

The period between 2006 and 2010 was also a time of considerable fluctuation in earnings and income, as measured in real dollars. By 2006, the average worker was earning just over \$60,000 at his or her job, in real dollars. The following year, earnings fell by nearly \$4,000; the year after that, they grew by over \$5,000. This pattern continued through 2010, and was reflected in trends in per capita income, which also fluctuated considerably during this time period. However, growth in earnings and income has largely been positive and steady since 2010. Growth in earnings and income in the city since 2000 was reflected in increasing household incomes since that year, as measured in current dollars.

In spite of increasing earnings and income in the city, the poverty rate climbed from 14.1 to 19.7 percent between 2000 and 2008-2012. Census tracts with disproportionately high shares of households in poverty were concentrated in the northwest of the city in 2000 and 2008-2012, in areas that were observed to hold high concentrations of black and Hispanic residents.

The number of housing units in the city increased slightly between 2000 and 2010. However, in keeping with the overall reduction in the city's population during that time, the number of occupied units fell by 1.1 percent. This was largely a result of a reduction in owner-occupied units; the number of renter-occupied units increased by 3.6 percent during this time. However, growth in the number of vacant units was more pronounced, and these units came to account for over 11 percent of the total housing stock by the end of the decade. The number of vacant housing units for sale grew over the decade, outpacing the increase in the number of vacant units overall. However, the number of "other vacant" units grew at a faster pace still, nearly doubling over the decade. These units were observed to be concentrated in the area to the north of the city center. Unfortunately, these units may represent a blighting influence where they are grouped in close physical proximity.

Households also increased in size between the two Censuses as the number of two-, three-, and four-person households fell. Though the number of one-person households grew slightly between 2000 and 2010, this growth was minor compared to the growth in the number of households with five members or more. The composition of the city's housing stock did not change much with respect to the type of housing, and single-family units were the most common type in both years.

⁵⁰ Note: the conceptual framework employed by the Census bureau concerning disability was revised significantly after 2000. These revisions were put into place in 2008. The Census bureau discourages direct comparison between post-2008 and pre-2008 disability figures, as these figures capture different, though overlapping, subsets of the population.

Households were less impacted by most of the housing problems described in Census data, with the exception of cost-burdening. In spite of the increase in the size of households after 2000, the share of overcrowded housing units fell by 0.2 percentage points. Housing units are considered overcrowded when they include more than one resident per room on average, and are considered severely overcrowded when the number of residents exceeds 1.5 per room. The share of severely overcrowded households likewise fell by 1.3 percentage points. The prevalence of housing units with incomplete plumbing and kitchen facilities was also very low, and decreased between 2000 and 2012. Considerably more households were affected by high housing costs relative to their income, or “cost-burdening”. Households are considered to be cost-burdened when more than 30 percent of their monthly income goes toward housing costs, and severely cost-burdened when housing costs claim more than 50 percent of their income. Nearly 19 percent of households were cost-burdened in 2008-2012, and 15.5 percent were severely cost-burdened. Unfortunately, these figures represent a considerable increase over 2000; these increases came as median housing costs grew between 2000 and 2012. In 2000, the median contract rent was \$511; by 2012, this figure had grown to \$566. Home values grew from \$83,600 to \$121,700 over the same time period.

Review of Fair Housing Laws, Studies, and Cases

Tulsa residents are protected from discrimination in the housing market by laws at the federal, state, and local levels. The federal Fair Housing Act serves as the foundation for fair housing policy in the United States, prohibiting discrimination on the bases of race, color, sex, religion, national origin, disability, and familial status. State law extends protections to Oklahoma residents based on these same attributes, and extends additional protection based on age. Tulsa law, while extending no protections based on age, expands on the list of protected classes in the FHA by prohibiting discrimination on the basis of ancestry and marital status. In spite of these protections, national studies indicate that illegal discrimination in the housing market continues, though such discrimination is rarely overt.

Fair Housing Structure

Tulsa residents who believe that they have been subjected to unlawful discrimination in the housing market may seek recourse from agencies and organizations at the federal, state, and local levels. Fair Housing law and policy is directed at the national level by HUD, which accepts complaints from anyone who believes that he or she has been the victim of discrimination outlawed under the Fair Housing Act. The Oklahoma Attorney General’s Office of Civil Rights Enforcement enforces the state human rights law, while Tulsa’s human rights ordinance is enforced by the Tulsa Human Rights Department. Tulsa residents may also file complaints with the Metropolitan Fair Housing Council, which will conduct an investigation of the complaint and direct the complaint to the appropriate enforcement agency. The Metropolitan Fair Housing Council coordinates on fair housing enforcement and investigation with Legal Aid Services of Oklahoma, which offers legal services to Oklahoma residents who feel that they have been subjected to illegal housing discrimination. Finally, a group of eleven local organizations and agencies, including the Tulsa Housing Authority, make up the Tulsa Area Fair Housing Partnership, which works to promote awareness of fair housing law and policy, and to ensure that Tulsa residents enjoy their right to fair housing choice.

Fair Housing in the Private Sector

Tulsans and prospective Tulsans applied for 35,946 home purchase loans from 2008 through 2012. Over 90 percent of these loan applications were for housing units in which the applicants intended to live; these loans are designated “owner-occupied” home purchase loans. Just over 13 percent of these owner-occupied home purchase loans were denied over the five-year period. Loan applications more frequently ended in denial in the northern portion of the city, particularly in the area north of Interstate 244. Denial rates also varied considerably by gender, race, and ethnicity: 13.5 percent of female applicants were denied loans from 2008 through 2012, compared to a denial rate of 12 percent for male applicants. Similarly, more than 22 percent of loan applications from black applicants were denied compared to a denial rate of 7.2 percent for white applicants. Meanwhile, the denial rate for Hispanic applicants exceeded that of non-Hispanic applicants by over ten percentage points. Black applicants tended to be denied more frequently in Census tracts outside of the area in which black residents were highly concentrated, notably in the city center and areas to the northeast of the city center. Hispanic residents were subject to high rates of loan denials in areas throughout the northern part of the city. As one might expect, the rate of loan denials fell as the income of the applicant increased; however, applicants of different races and ethnicities continued to be subject to different denial rates, even when they were similarly situated with respect to income.

Those applicants who were able to secure a home purchase loan were sometimes issued loans with high annual percentage rates (HALs). In all, 4.5 percent of borrowers paid interest rates on those loans that exceeded treasury rates for comparable loans by three percentage points. The incidence of such predatory style lending dropped considerably after 2008. In keeping with trends in loan denials was the impact of race and ethnicity on HAL rates: 7.6 percent of loans issued to black residents were HALs, and 6.2 percent of loans issued to Hispanic residents were predatory in nature. By comparison, the HAL rates for white and non-Hispanic residents were 4.4 and 4.3 percent, respectively. Borrowers in general were more likely to be issued HALs in the area to the north and northeast of the city center, which held relatively high concentrations of black and Hispanic residents. Black residents tended to be issued HALs outside of areas with high concentrations of black residents, while Hispanic residents were often subject to high rates of predatory style lending in areas with high concentrations of Hispanic residents.

Small business lending in the city was observed to vary considerably according to the median income of the Census tracts in which these loans were issued. Less than four percent of the small business loans reported under the Community Reinvestment Act (CRA) were issued in tracts in which the median family income was less than half of that of the area as a whole. By contrast, nearly half of these loans were issued in Census tracts with median incomes at or above 120 percent of the area median. The city center was the target of considerable investment, as was a large Census tract that lay along the Broken Arrow Corridor. By contrast, relatively few small business loans were issued to the north of the city center.

HUD, the Tulsa Human Rights Department, and the Metropolitan Fair Housing Council all provided data on complaints that they received from city residents. More than half of the complaints that HUD received during the period from 2004 through August 2014 cited discrimination on the basis of disability, or 113 complaints. Race was the second most common complaint basis, and was cited in 84 complaints. Failure to make reasonable

accommodation was a common allegation in these complaints, as were allegations of discrimination in the rental housing market. Disability and race were also the most common bases for complaints lodged with the Human Rights Department and the Metropolitan Fair Housing Council.

The perception of discrimination in the rental housing market was also relatively common among respondents to the 2015 City of Tulsa Fair Housing Survey. Around 30 percent of respondents reported being aware of discrimination in that area, while a quarter of respondents maintained that they were aware of discrimination in the real estate industry and around 20 percent had perceived discrimination in the mortgage and home lending industry. Specific violations of fair housing policy cited by survey respondents included tacit refusal to rent to racial minorities and families with children, steering in the real estate market, and differential treatment in home lending on the basis of race. In addition, survey respondents noted a failure on the part of housing designers and builders to include accessible features in new housing units.

Fair Housing in the Public Sector

The review of fair housing in the public sector involved an examination of the distribution of subsidized housing units in the city, as well as the extent of the public transit network and the location of employment centers, along with analysis of the results of the 2015 Fair Housing Survey. Subsidized housing units tended to be located near areas with above-average poverty rates and concentrations of black and Hispanic residents, and were often not well-connected by public transit to the city's employment centers. In fact, the perceived shortcomings of the transit system was a subject of wide agreement on the part of survey respondents: 43 percent of respondents claimed to be aware of barriers to fair housing choice in the provision of government services in the city, and many who provided additional commentary cited the limitations of the transit system as a barrier to those with limited personal transportation options. In addition, survey respondents perceived the influence of NIMBYism in zoning and land-use laws in the city, and maintained that neighborhood opposition to affordable and subsidized units represented a barrier to fair housing choice in the city.

Public Involvement

Public input during the 2015 AI process was sought through the solicitation of citizen participation in the 2015 Fair Housing Survey, along with the Fair Housing Forum held in the city in October of 2014. Those who participated in the survey were generally supportive of the goals of fair housing laws and policies, though many felt that the laws are difficult to understand or follow. Furthermore, many respondents felt that current fair housing laws are not sufficiently enforced, and need to be expanded to include protections based on sexual orientation. Survey respondents were also largely unaware of local fair housing laws or plans, though many were aware of specific geographic areas that they considered to have significant fair housing problems, including north, west, and south Tulsa. Participants in the October Fair Housing Forum highlighted several challenges to fair housing policy in the city, including NIMBYism, the need to promote inclusionary zoning, the need to update the city's fair housing policy, and economic challenges facing north Tulsa. Finally, the findings from the AI process were presented to the city council on February 20, 2015.

SECTION IX. IMPEDIMENTS AND SUGGESTED ACTIONS

Private Sector Impediments, Suggested Actions, and Measurable Objectives

Impediment 1: More frequent denial of home purchase loans to black, Hispanic, and female loan applicants. This impediment was identified through review of data gathered under the Home Mortgage Disclosure Act (HMDA), as well as the results of the 2015 Fair Housing Survey. While HMDA data do not include some information that is highly pertinent to the loan application process, such as the credit score of the applicant or prospective down payment amount of the loan, these data do allow the researcher to gauge the experience of individuals entering the housing market, and determine whether the likelihood of being issued a loan varies with the race, ethnicity, or sex of the applicant. According to those data, black residents were nearly twice as likely as white residents to be denied a home purchase loan from 2008 through 2012. Likewise the denial rate for Hispanic applicants exceeded the denial rate for non-Hispanic applicants by over ten percentage points, and the denial rate for female applicants exceeded that of male applicants by around 1.5 percentage points on average. Survey applicants also cited a perceived differential treatment of loan applicants based on race as a barrier to fair housing in the city.

Action 1.1: Enhance outreach activities for prospective homebuyers.

Measurable Objective 1.1: The number of outreach activities taken

Action 1.2: Enhance homebuyer classes making buyers aware of high denial rate histories.

Measurable Objective 1.2: The number of enhanced classes given

Impediment 2: Apparent predatory lending falls more heavily on black and Hispanic borrowers. According to home loan data collected under the HMDA, 4.5 percent of home purchase loans issued in the city were predatory in nature (HALs). However, the rate of HALs to black borrowers was over 3 percentage points higher than the HAL rate for white borrowers (See Appendix E, Tables E.8 through E.10). Similarly, Hispanic applicants were considerably more likely than non-Hispanic applicants to be issued a loan with a high annual percentage rate. Further support for these trends was found in the perceptions of survey respondents, who maintained that racial and ethnic minorities are more subject to predatory style lending than white or ethnic majority borrowers.

Action 2.1: Enhance outreach activities for prospective homebuyers.

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

Impediment 3: Discriminatory terms, conditions, privileges, or facilities relating to rental, and refusal to rent. This impediment was identified through review of the 2015 Fair Housing Survey, as well as complaints lodged with HUD and the Metropolitan Fair Housing Council (Metro Fair Housing). Approximately thirty percent of survey respondents stated that they were aware of barriers to fair housing choice in the rental housing market. In addition, around 30

percent of complaints lodged with HUD cited discrimination in the rental market specifically, and a majority of fair housing tests conducted by Metro Fair Housing concerned discrimination in the rental market.

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

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

Impediment 4: Failure to make reasonable accommodation or modification. Discrimination on the basis of disability was, by a wide margin, the most common complaint that HUD received from Tulsa residents from 2004 through August 2014. More than half of these complaints alleged discrimination on the basis of disability, and failure to make reasonable accommodation was a common complaint issue. Similarly, around three-fifths of complaints lodged with the City of Tulsa Human Rights Department concerned discrimination on the basis of disability, along with just under half of the complaints received by Metro Fair Housing. Accessibility issues also triggered just under half of the fair housing tests conducted by Metro Fair Housing from 2011 through 2013.

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.

Measurable Objective 4.1: The number of trainings to program managers that were enhanced per year

Action 4.2: Enhance outreach and education for housing providers, advising them that they may not stand in the way of making reasonable accommodation or modification.

Measurable Objective 4.2: The number of outreach and education activities taken for providers

Impediment 5: Steering and redlining appears in Tulsa. This impediment was identified through review of the 2015 Fair Housing Survey. Redlining was perceived to impact housing choice through policies and practices in the home insurance and appraisal industries, as well as through property tax policies. For example, in commentary submitted with a survey question concerning home insurance, approximately one-third of commenters identified redlining as a fair housing issue in the city, or described practices that amount to redlining. In addition, respondents cited steering as a barrier to fair housing choice in the real estate industry. In a question concerning perceived discrimination in the real estate market, approximately half of commenters specifically identified “steering”, or practices that amount to steering, as a fair housing issue in Tulsa.

Action 5.1: Verify testing is performed to uncover the degree of steering and redlining that appears to be occurring in the city.

Measurable Objective 5.1: Number of tests or other alleged steering and redlining issues reported by local non-profits and other organizations.

Impediment 6: Insufficient understanding of Fair Housing laws. This impediment was identified through review of the Public Involvement segment of the 2015 Fair Housing Survey. Though many respondents considered themselves to be familiar with fair housing laws, nearly a quarter professed to be unfamiliar with such laws. In addition, a majority of respondents maintained that there was no training process available to learn about fair housing laws, or that they didn't know about such opportunities. In addition, nearly 45 percent of respondents maintained that fair housing laws are difficult to understand or follow.

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 Human Rights Department and Human Rights Commission

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

Impediment 1: Insufficient understanding of Fair Housing laws. This impediment is listed as a public sector impediment to underscore the fact that private and public sector factors may contribute to a limited understanding of fair housing laws and policies, as well as to suggest that addressing this impediment will require engagement on the part of private and public sector actors. The impediment was identified through review of results to the 2015 Fair Housing Survey, which included a question on whether or not fair housing laws should be changed, and on the types of changes that respondents would like to see. Many proposed changes focused on the need to clarify fair housing laws, and to promote education and enforcement on fair housing policies. In addition, nearly thirty percent of respondents who shared desired changes to fair housing laws identified a need for additional fair housing protections on the basis of sexual orientation and gender identity.

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

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 protection for individuals with respect to sexual orientation and gender identity.

Impediment 2: Concentrations of assisted housing exist in Tulsa. This impediment was identified through analysis of the geographic distribution of assisted housing units in the city. These units tended to be located in areas with above-average and disproportionate rates of poverty, as well as in areas with relatively high concentrations of black and Hispanic residents.

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

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

Action 2.3: Present or provide access to AI findings to the Tulsa City Council and public.

Measureable Objective 2.3: Record of presentations and information postings.

Impediment 3: NIMBYism; multi-family housing discouraged. This impediment was identified in consultation with Tulsa stakeholders during the 2014 Fair Housing Forum, as well as in review of the results of the 2015 Fair Housing Survey. According to one forum participant, neighborhood opposition to affordable housing projects is “getting worse all of the time”, and another commenter noted that there is a “stigma” attached to affordable housing units that inspires particularly strong opposition to these units. NIMBYism was also identified as a barrier by survey respondents who, like the forum participants, perceived the influence of NIMBYism in zoning and land-use decisions in the city.

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.

Impediment 4: Zoning works against affordable housing. This impediment was also identified through review of survey results and the discussion at the 2014 Fair Housing Forum. Zoning and land-use decisions were perceived to be subject to NIMBYism, which served to bar affordable housing from many areas in the city. In addition, survey respondents cited the need for changes to the zoning code itself to provide for more inclusionary zoning.

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.

Measurable Objective 4.2: Number of attempts to change zoning codes.

Impediment 5: Inadequate code enforcement for some areas. This impediment was identified through review of the 2015 Fair Housing Survey. Over 20 percent of respondents maintained that they were aware of practices and policies in occupancy, health, and safety code enforcement that amounted to barriers to fair housing choice.

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.

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.

Impediment 6: Lack of a sufficient public transit system. This impediment was identified by participants in the 2014 Fair Housing Forum and 2015 Fair Housing Survey, as well as through review of the transit network that is currently in place. Many survey respondents shared the sentiment that the current transit network does not adequately serve the needs of the city, and this perception was reflected in commentary at the Fair Housing Forum. Furthermore, review of

the city's transit network suggested that many of the area's public housing units are not well-connected to the city's employment centers.

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 City of Tulsa to address this need.

SECTION X. GLOSSARY

Accessible housing: Housing designed to allow easier access for physically disabled or vision impaired persons.

ACS: American Community Survey

AI: Analysis of Impediments to Fair Housing Choice

AMI: Area median income

BEA: Bureau of Economic Analysis

BLS: Bureau of Labor Statistics

CDBG: Community Development Block Grant

Census tract: Census tract boundaries are updated with each decennial census. They are drawn based on population size and ideally represent approximately the same number of persons for each tract.

Consolidated Plan: Consolidated Plan for Housing and Community Development

Cost burden: Occurs when a household has gross housing costs that range from 30.1 to 50 percent of gross household income. A **severe cost burden** occurs when gross housing costs represent 50.1 percent or more of gross household income.

CRA: Community Reinvestment Act

Disability: A lasting physical, mental, or emotional condition that makes it difficult for a person to conduct daily activities of living or impedes him or her from being able to go outside the home alone or to work.

Disproportionate share: Exists when the percentage of a population is 10 percentage points or more above the study area average.

DOJ: U.S. Department of Justice

ESG: Emergency Shelter Grants program

Fannie Mae: Federal National Mortgage Association (FNMA), a government-sponsored enterprise that purchases mortgages from lenders and repackages them as mortgage-backed securities for investors.

Family: A family is a group of two people or more related by birth, marriage, or adoption and residing together.

FFIEC: Federal Financial Institutions Examination Council

FHAP: Fair Housing Assistance Program

FHEO: Fair Housing and Equal Opportunity

FHIP: Fair Housing Initiative Program

Floor area ratio: The ratio of the total floor area of a building to the land on which it is situated, or the limit imposed on such a ratio.

Freddie Mac: Federal Home Loan Mortgage Corporation (FHLMC), a government-sponsored enterprise that purchases mortgages from lenders and repackages them as mortgage-backed securities for investors.

GAO: U.S. General Accounting Office

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

HAL: High annual percentage rate (APR) loan, defined as more than three percentage points higher than comparable treasury rates for home purchase loans, or five percentage points higher for refinance loans.⁵¹

HMDA: Home Mortgage Disclosure Act

HOME: HOME Investment Partnerships

HOPWA: Housing Opportunities for Persons with AIDS

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

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

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

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

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

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

MFI: Median family income

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

MSA: Metropolitan Statistical Area

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

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

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

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

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

- If they are HOEPA loans;⁵²
- Lien status, such as whether secured by a first lien, a subordinate lien, not secured by a lien, or not applicable (purchased loans); and
- Presence of HALs. For full definition, see **HAL**.

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

⁵² Loans are subject to the HOEPA if they impose rates or fees above a certain threshold set by the Federal Reserve Board. "HMDA Glossary." <http://www.ffiec.gov/hmda/glossary.htm#H>

Protected Class: Group of people protected from discrimination and harassment. City of Tulsa residents are protected from housing discrimination based on race, sex, religion, familial status, disability, national origin, color, age, ancestry, and marital status.

Public housing: Public housing was established to provide decent and safe rental housing for eligible low-income families, the elderly, and persons with disabilities.

RDA: Redevelopment agency

Severe cost burden: (See **Cost Burden**).

Severe overcrowding: (See **Overcrowding**)

Steering: Actions of real estate agents or landlords to discourage a prospective buyer or tenant from seeing or selecting properties in certain areas due to their racial or ethnic composition.

Tenure: The status by which a housing unit is held. A housing unit is "owned" if the owner or co-owner lives in the unit, even if it is mortgaged or not fully paid for. A cooperative or condominium unit is "owned" only if the owner or co-owner lives in it. All other occupied units are classified as "rented," including units rented for cash rent and those occupied without payment of cash rent.

APPENDICES

The following sections present additional data prepared in development of the City of Tulsa Analysis of Impediments to Fair Housing Choice.

A. COMMUNITY REINVESTMENT ACT (CRA) DATA

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

City of Tulsa
2000–2012 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	341	1,572	2,259	2,542	0	6,714
2001	397	2,163	3,017	3,240	0	8,817
2002	396	2,382	3,639	3,766	0	10,183
2003	165	3,279	3,044	4,863	0	11,351
2004	159	2,789	3,321	5,112	0	11,381
2005	186	2,658	3,211	4,963	0	11,018
2006	240	3,791	4,752	7,659	0	16,442
2007	283	4,135	4,954	8,070	0	17,442
2008	192	3,049	3,654	6,662	0	13,557
2009	80	1,226	1,349	2,736	0	5,391
2010	69	1,178	1,407	2,766	0	5,420
2011	75	1,354	1,497	2,977	0	5,903
2012	558	1,886	1,051	2,952	0	6,447
Total	3,141	31,462	37,155	58,308	0	130,066
Loan Amount (\$1,000s)						
2000	4,025	24,598	32,008	39,544	0	100,175
2001	4,574	28,908	38,588	49,354	0	121,424
2002	4,568	28,824	41,367	53,613	0	128,372
2003	2,170	41,810	32,214	73,944	0	150,138
2004	1,651	37,174	37,927	79,231	0	155,983
2005	2,088	35,507	35,035	72,852	0	145,482
2006	1,833	38,158	47,073	89,829	0	176,893
2007	2,367	47,098	50,520	102,250	0	202,235
2008	2,008	35,734	37,498	85,203	0	160,443
2009	816	20,030	20,428	42,113	0	83,387
2010	1,021	19,615	20,835	47,641	0	89,112
2011	1,055	22,418	21,831	46,085	0	91,389
2012	9,253	25,243	14,651	46,492	0	95,639
Total	37,429	405,117	429,975	828,151	0	1,700,672

Table A.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI

City of Tulsa
 2000–2012 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	14	122	115	154	0	405
2001	19	147	179	216	0	561
2002	23	148	197	220	0	588
2003	8	223	182	344	0	757
2004	13	202	177	360	0	752
2005	19	161	136	307	0	623
2006	13	172	132	311	0	628
2007	6	218	168	362	0	754
2008	6	164	146	270	0	586
2009	7	120	109	196	0	432
2010	6	156	140	184	0	486
2011	6	139	102	180	0	427
2012	54	128	80	200	0	462
Total	194	2,100	1,863	3,304	0	7,461
Loan Amount (\$1,000s)						
2000	2,771	21,263	20,222	28,709	0	72,965
2001	3,354	26,146	32,117	37,785	0	99,402
2002	4,277	26,286	35,333	38,972	0	104,868
2003	1,467	40,940	32,305	60,625	0	135,337
2004	2,180	37,240	31,533	63,754	0	134,707
2005	3,413	28,582	24,146	54,329	0	110,470
2006	2,366	30,228	23,730	55,889	0	112,213
2007	1,025	37,721	29,606	65,123	0	133,475
2008	990	29,302	26,370	47,941	0	104,603
2009	1,214	21,330	19,069	34,041	0	75,654
2010	891	28,262	24,989	32,504	0	86,646
2011	1,094	24,870	19,244	31,274	0	76,482
2012	8,720	22,524	13,476	34,479	0	79,199
Total	33,762	374,694	332,140	585,425	0	1,326,021

Table A.3
Small Business Loans Originated: More than \$250,000 by Tract MFI

City of Tulsa
 2000–2012 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	12	103	107	133	0	355
2001	15	158	196	213	0	582
2002	21	140	202	227	0	590
2003	10	215	193	314	0	732
2004	11	202	227	348	0	788
2005	10	207	176	307	0	700
2006	14	187	183	310	0	694
2007	11	194	179	380	0	764
2008	11	190	166	304	0	671
2009	6	148	94	199	0	447
2010	5	152	176	231	0	564
2011	7	148	160	218	0	533
2012	61	188	87	205	0	541
Total	194	2,232	2,146	3,389	0	7,961
Loan Amount (\$1,000s)						
2000	5,319	53,900	55,709	67,849	0	182,777
2001	8,152	85,353	101,998	108,910	0	304,413
2002	9,837	71,271	107,303	116,630	0	305,041
2003	6,150	118,524	101,020	158,472	0	384,166
2004	5,141	107,186	127,036	178,821	0	418,184
2005	4,930	115,549	94,521	161,015	0	376,015
2006	8,115	106,561	95,499	166,532	0	376,707
2007	5,435	106,008	91,460	198,911	0	401,814
2008	7,489	103,415	83,751	158,783	0	353,438
2009	4,290	81,169	48,170	103,873	0	237,502
2010	2,307	81,957	95,645	122,597	0	302,506
2011	2,844	84,373	84,948	124,566	0	296,731
2012	35,517	102,236	46,243	107,624	0	291,620
Total	105,526	1,217,502	1,133,303	1,774,583	0	4,230,914

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

City of Tulsa
 2000–2012 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	124	704	1,044	1,219	0	3,091
2001	128	1,187	1,549	1,729	0	4,593
2002	105	784	1,310	1,564	0	3,763
2003	59	1,404	1,296	2,512	0	5,271
2004	60	1,106	1,309	2,429	0	4,904
2005	75	1,242	1,598	2,690	0	5,605
2006	82	1,369	1,910	3,313	0	6,674
2007	99	1,591	1,945	3,453	0	7,088
2008	55	957	1,302	2,529	0	4,843
2009	27	397	461	861	0	1,746
2010	28	516	625	1,119	0	2,288
2011	35	631	755	1,487	0	2,908
2012	243	820	566	1,519	0	3,148
Total	1,120	12,708	15,670	26,424	0	55,922
Loan Amount (\$1,000s)						
2000	5,901	40,324	48,415	69,195	0	163,835
2001	4,484	52,625	74,945	99,309	0	231,363
2002	5,780	43,073	77,355	109,047	0	235,255
2003	2,226	78,983	76,537	167,671	0	325,417
2004	3,968	82,674	93,834	186,607	0	367,083
2005	3,002	66,838	63,673	153,494	0	287,007
2006	2,536	61,163	78,580	155,024	0	297,303
2007	3,810	71,466	70,142	178,905	0	324,323
2008	2,964	46,601	58,841	135,836	0	244,242
2009	1,423	30,098	29,553	63,346	0	124,420
2010	1,431	45,278	43,384	87,527	0	177,620
2011	1,757	39,281	44,597	84,007	0	169,642
2012	11,603	45,971	28,444	78,677	0	164,695
Total	50,885	704,375	788,300	1,568,645	0	3,112,205

B. FAIR HOUSING SURVEY OPEN QUESTIONS

FEDERAL, CITY, AND LOCAL LAWS

Table B.1

Where would you refer someone if they felt that their fair housing rights had been violated?

City of Tulsa
2015 Fair Housing Survey Data

Comments:
<p>Call local office in Ft Worth or file on-line City Hall City mayor City of City of Tulsa City of Tulsa Human Rights Department for referral to appropriate entity. city of Tulsa or HUD City of Tulsa, Housing Dept City of Tulsa, Oklahoma, Mayors Action Line city or county office contact the nearest HUD office court house under proper authority or ask for referral to the proper authority Department of Housing and Urban Development. Department of Human Rights? DHS District Attorney Tulsa don't know Don't know Fair housing/HUD Fha Housing and urban development Housing Authority Hud HUD HUD Form 903 HUD or City of Tulsa Human Rights Commission HUD or the Human Rights Department HUD-Office of Fair Housing and Equal Opportunity Hud, AG'S office, Court HUD, OAG, CoT Hud, Tulsa housing authority.anyone that would fight harder for those of us trying to make a difference in life. There are so many regulations and rules that it is hard to qualify for housing or any assistance whatsoever. hud.gov Human rights commission Human Rights Commission Human Rights Department - City of Tulsa Human Rights Office I AM ABSOLUTELY OPPOSED to any HUD directed redistribution of housing. Out housing reg SHOULD BE TOTALLY LOCAL!!!!!! I don't know I don't know. I Dont know i have no idea I would begin with the City of Tulsa for direction. I would find out online, but if I had to guess without searching the internet I'd say at the County Court House. I would firts approach the City of Tulsa Human Rights Department I would have to research this info I would just move on to the next spot and nothing would never happen. I would search google for the appropriate venue. I would search ok.gov for a state agency. I'm not sure idk If the landlord promised to have the said rental property fixed up and hasn't done so in the 4yrs I have rented from her it would not help Local Boards of Realtors, Department of Housing and Urban Development Local Housing A local HUD office maybe Metro Fair housing Council of Oklahoma HUD (if you live in public housing, section 8, or other HUD subsidized housing) City of Tulsa (though there is no enforcement authority through the City)</p>

No
 No Clue
 no idea
 not sure
 Not sure
 Not sure.
 Offic eof Fair Housing in Oklahoma City
 Online by clicking on Housing Discrimination Complaint
 Since I don't live at a THA property, I have no idea.
 State and/or Federal Government
 State Dept of Housing
 State of Okla or applicable jurisdiction
 Tha
 the city's human rights department
 The federal department of housing and urban development. I don't know if there's a local office or local dept. for fair housing (maybe the human rights commission?).
 The Office of the Secretary of the Department of Housing and Urban Development
 Through an attorney
 Tulsa Housing
 Tulsa office of U.S. Department of Housing & Urban Development
 U.S. Department of Housing and Urban Development ("HUD")
 Unsure, would google :)
 Urban Development
 Us District or State courts.
 with HUD
 with the city
 With the Fair Housing Authority.
 With the Housing authority and Hud
 With the state office of fair housing or with HUD.
 yes
 Yes

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

City of Tulsa
 2015 Fair Housing Survey Data

Comments:
10 years ago while studying Real estate a news letter through the city of tulsa Annual Fair Housing Seminars for past 23 years for Realtors. Attended a workshop being a lesbian I have looked at them in minor ways to see if there was protection for discrimination and also for those with disabilities Compliance manager for the City Currently serving on a Fair Housing Committee and learning about the fair housing laws Developing Tax Credit Properties During my home buying experience During searches for housing; posters Experience Generally aware of fair housing laws with a general impression they are needed in order to provide adequate housing in Tulsa. Grace Hills, Seminars and lenght of time in the insdury had HUD rental Have been working with impoverished families for some time; affordable housing is a common barrier. head of the housing committee for the 61st and peoria task force, led by the mayor and city council. and local advocate for good land use and transportation policy for 10 years. homebuyers class homeowner in an area bordered by low income apartments. human rights commission I am a Fair Housing attorney I am homeless with a job and have been trying to establish housing for over a year without success. And at present do not have a disability rating. I became aware during the process of purchasing my own home years ago. It was disclosed in my paperwork and within several agencies websites that I researched while doing my due diligence on my purchase. I consult with companies regarding a segment of fair housing laws, so I try to stay updated in other areas as well. I follow the news and have some knowledge of fair housing laws through news coverage. I know there are certain laws regarding mortgages and interest and escrow accounts. I also know that they are laws for renters and landlords I love to read any and everything that may have to do with my children. I participate in a webinar a year or so ago I practice law in the housing area I studied the Fair Housing Act some years ago and led a continuing education class on the topic for others. I used to work for the Tulsa Housing Authority.

I work for local government and I have tangential, but not extensive knowledge of the legal provisions.
 I worked for the Housing Authority for over 15 years
 I worked in the Housing Industry for many years. I have worked in Public Housing. I have been a housing counselor. I have been involved in the Tulsa Area Fair Housing Partnership.
 I'm a realtor.
 I'm only somewhat aware.
 In trying to purchase a home.
 In working with the community and home base behavioral specialists. I've come in to contact with tenants, and clients in need of housing, and how to apply.
 Job related
 Legislation touches on the fringe, such as renters need to know if meth had been made on premises, to protect toddlers on carpet with neurotoxins ...
 Licensed realtor for 14 years
 Life
 limited exp with landlord/tenant legal cases
 Manage an apartment complex
 My clients
 My job requires I help women find housing.
 Necessity for clients as well as myself
 On mayors human rights commission
 Only from what I've read on the article written in the news for FOX23.com
 Owning rental property
 Posted notices
 Previously worked for HUD.
 property management and contractual compliance with multifamily acquisition and rehab
 Reading city planning documents
 Reading information provided by Tulsa Housing Authority for my rental property.
 Reading the laws on the city website. Reading articles about low-income housing and Section 8 housing. Landlord-Tenant Act.
 Reading, mostly online
 Real Estate Broker
 Relative filed suit against homeowner for housing discrimination and won
 Required for Realtor continuing education
 Required real estate education
 Research
 research activities
 researching this topic
 School
 Through investigating to inform my clients of their concerns
 Through property ownership and through volunteer work with housing programs of the Mental Health Association Oklahoma.
 Through required real estate education.
 Through work as a service provider.
 thru HUD regulations; grant rules
 To become a realtor you must study the fair housing law and I teach fair housing
 Training
 Via work and public information
 We rent to Section 8 recipients.
 When a friend was discriminated against
 While assisted non-profits in Okla to acquire funds and develop Low Income Elderly and Disabled Housing (Sec 202/811) Programs for the past 25 years, as well as Exec Dir of OKC Hsg Authority for 4 years.
 Worked in apartment management in Tulsa for 7+ years.
 working in city government and watching various projects and proposals through the course of several years
 working with HUD on projects
 Working with the City of Tulsa provides many opportunities to participate in review of their content and application. Also serve on the Fair Housing Committee,

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

City of Tulsa
 2015 Fair Housing Survey Data

Comments:

Add sexual orientation and gender identification
 ALL people should not need a degree to decipher the words and loopholes of what is considered fair housing.
 Better protection of privacy for tenants.Limits on rules imposed by management.
 Built environment, the housing interface, how housing connects with surrounding neighborhoods, amenities, transit and transportation options, etc. can limit housing choices and needs to be addressed.
 Change statutes/ordiances at state &/or local level that allow a procedure for local governments to enforce non-compliance via a civil action.
 Don't group everyone together like they are under quarantine. They are a group that is still singled out
 Fair housing Act should include men, despite the "feminization of poverty homeless in U.S. Most anti-poverty programs are written in such a way as to exclude men. Fair Housing need to check on landlords approvals because they're a lot of Donald Sterling out there discriminating against many minorities in there complexes.
 Fair housing needs to be fair to all, you should not deny someone's residence because of their sexual orientation or identity.

Felons should be accepted in an individual bases.
 Hold Slumlords like the one I'm paying \$700 a month to accountable. As a wage-slave under the evil right-to-work system, high rent is keeping me stuck where I can't afford to save for a down payment towards buying a home or fixing my credit. With the lack of affordable healthcare, even under the new law, people like me and my disabled wife, are struggling to survive.
 I AM ABSOLUTELY OPPOSED to any HUD directed redistribution of housing. Out housing reg SHOULD BE TOTALLY LOCAL!!!!!!
 I believe that people with previous criminal history should not be discriminated against especially if there is no conviction in the matter.
 I believe that there should be a department set up to be sure that everyone is following the Fair Housing Law.
 I don't know that much, but a friend was incarcerated for something that his passenger in the car did, but he was the driver so everyone was convicted. But, now he cannot get housing and is having a real hard time of living in a livable housing arrangement.
 I feel we should add sexual orientation to the protected classes.
 I think the laws should protect free markets
 I think they should be expanded to include sexual orientation and gender
 I think you should get the input of those that have filed complaints on areas that need improvement.
 Inclusion of Sexual Identification (self seen gender) and protection of sexual orientation
 Inclusion of Sexual Orientation and Gender Identity
 It is still very much a disparity in the numbers of homeowners in race, and now location as well here in Tulsa.
 It seems that there are no opportunities available on the south side of Tulsa. Only North & east and West. Places that I would not want to raise my child
 It should be made illegal to discriminate against a persons sexual orientation.
 LGBT should be a protected class. There should be stronger enforcement authority and more funding to support both education and enforcement.
 more local control
 Needs to be more transparent.
 No one follows up on complaints
 People with criminal backgrounds included if they are employed and not in trouble currently.
 Require quality low income housing in better neighborhoods so that nice housing in the city is not one-sided
 sexual orientation and gender should be protected
 Should include sexual orientation
 Strengthen.
 The city of Tulsa doesn't regard the very statement they use to be a fair housing city. The city is lacking in a wide variety of housing that is available for those at different incomes and at varying phases of life. A new approach should be made in allowing zoning codes to change to make the city as a whole more functional.
 The only thing I would suggest is adding "sexual orientation" to the list of protected classes.
 There needs to be better enforcement, also it needs to include gender identity and sexual orientation on the state level
 There should be more enforcement on the local level
 They should include requirements for inclusionary zoning by municipalities.
 to better everyone.
 to specifically include legal status (documented, undocumented)
 Too restrictive on the part of the service provider. What is identified as a reasonable accommodation is really unreasonable and frequently inconveniences all the other tenants who were there first.
 We need to add LGBT persons as a protected class
 Yes, fair housing laws are now swayed more toward the minorities. Sort of like Affirmative Action goes against non-minorities. It seems minorities have more rights than non-minorities now days.
 You should be able to evict people who abuse their home and destroy property without jumping through hoops. A small few ruin rental privileges for others.

LOCAL FAIR HOUSING

Table B.2
Are there any specific geographic areas that have fair housing problems?

City of Tulsa
 2015 Fair Housing Survey Data

Comments:
<p>All of them it is not just minorities moving into white areas why don't poor white s purchase in areas that have cheaper housing instead of renting. .because those areas have minorities living there and they know city services, appraisal, police enforcement, etc will be inadequate.</p> <p>All of Tulsa north of I-244 The area between 61st & Peoria and 81st & Riverside, and encompassing roughly a 1-mile swath in that line. The area east of a line running from I-244 & Sheridan down to 41st & Mingo Everything west of the Arkansas River</p> <p>All over town</p> <p>All over Tulsa, people need to be educated and provided assistance. Especially in the rental community.</p> <p>Brookside</p> <p>District 1</p> <p>east, west and north are have very limited resources, segregation is very high</p> <p>I have a tendency to believe that fair housing problems exist in South Tulsa because many neighborhood fight to keep out low income housing in that area.</p> <p>I just stay away from north Tulsa and far east Tulsa, ditto with the 61st & Peoria area.</p> <p>I'm sure everywhere in Tulsa</p> <p>Lack of investment in maintaining civic infrastructure (e.g. sidewalks, parks, streetscaping, transit) in the inner city means that there</p>

are large areas of blight where only slums are available. Private investors have cleaned up some homes, but progress is slow).
 Listed previously
 Most areas.
 North
 North Tulsa
 North Tulsa - high crime rate
 North Tulsa - Problems finding rental because of being white.
 North Tulsa - significant housing that has been abandoned or condemned and does not meet code, with little funding/help to improve conditions. East and West some of this to.
 North Tulsa and East Tulsa
 North tulsa especially eastern half of north tulsa
 North Tulsa near Osage county disproportionately high minority communities. East Tulsa disproportionately high Hispanic population. All of mid-town has disproportionately high white population.
 North, East & West
 North, East and West Tulsa
 Our city is greatly divided on racial lines.
 Realtors avoid showing properties in north Tulsa.
 South Tulsa
 South Tulsa, Mid-town, Slum lords in North Tulsa
 the land lords and county are not made to keep up there propertyi feel that is unfair housing causes others to live around unsafe and unclean areas
 west Tulsa,police and schools as well as money to remove undesirable rundown property making way for new and improved area.
 north Tulsa,all of it is bad. we cant let or kids play in the streets because of drug runners gangs speeders and lack of any TPD involvement.. why does it take over an hour to get a response to a 911 call around north pine and lewis area but the average time south of admiral is less than 15 minutes? who REALLY wants to live like that? only those that have no other choice because of unfair housing issues, i.e owners and landlords.
 While I believe that there are housing inequities in certain parts of town (i.e., North Tulsa), I do not have reason to believe that is a result of Fair Housing Act violations. In those areas, the problem is more economic and cultural rather than housing policies.

Table B.3
Please share any additional comments.

City of Tulsa
 2015 Fair Housing Survey Data

Comments:
<p>(1) Incentive based zoning categories in other communities have been researched (e.g., incentive-based inclusionary zoning, including requiring that a percentage of affordable housing be a component of any project seeking local funding assistance (e.g. - "gap financing") for a housing/mixed-use project. (2) The updated Tulsa Comprehensive Plan - Housing component addresses the need for adequate housing for all. Specific goals, priorities, and policies are set forth in the Plan. Implementation actions to achieve these includes updating the Tulsa Zoning code, preparation of Small Area Plans that address these matters, and assistance for housing projects in underserved areas including Downtown Tulsa. The</p> <p>As a city, we really need to embrace being on the leading edge of improving this situation.</p> <p>At least finally conducting this study inadequatelyrics limited as it is.</p> <p>Community homes , where groups could share common areas such as kitchen and living room , dining, and outdoor space but cost share individual bedrooms. Seniors, find themselves broke, but don't want to be rooming with felons, use drugs, smoke, but take care of property..... Need housing too</p> <p>fair housing needs to be included in the discussion of new tools and options for the zoning code which is currently being updated to better conform with PLANITULSA (adopted 2010)</p> <p>If the city followed its own comprehensive plan, the issue of fair housing would take care of itself. The natural outcome of responding to market demands and spending public dollars more efficiently in focused neighborhoods around an urban core, with good access to public transit, would be more of a diversity of housing choices. In other words, you wouldn't have to enforce bad practices; you'd create the environment where good practices make economic sense for everyone in the housing industry.</p> <p>Low wages have made even the least expensive rentals hard to obtain.</p> <p>Most people won't even know how to complete this survey unless they are familiar with some small idea of what the Fair Housing Act/Plan is. The ones who have been discriminated against or know of some violations won't know how to answer most of these questions.</p> <p>Seems like this survey is geared toward people in the industry -- and most of them would be likely to have a positive outlook on the state of fair housing.</p> <p>The City needs to step up in enforcement and educating the public. This should be a priority in that we need to make sure people are afforded the right to live in decent safe and sanitary housing. Enforcement and education should come from the City. It makes no sense that the only enforcement agency is in Oklahoma City.Why is it the City is not using or taking opportunity of the Fair Housing Grants and free training to become an eforment agency??</p> <p>The city should bulldoze some of the Section 8 apartments. All they seem to attract are poor females with kids from various men never married to any of them, living on welfare, food stamps or low income jobs.</p> <p>The distribution of downtown housing funds via recent public funding measures should have as a requirement for funding approval that a percentage of housing to be built (5-10%) will be required to be worker rate/affordable housing units ADA compliant housing and such units would be provided in and be a part of a primarily market rate project. Incentives should be considered in the updated zoning code to facilitate provision of a small percentage of affordable/worker rate mixed with market rate housing in new developments (e.g. - a density bonus)</p> <p>The Laws are somewhat fine. We just need them to really be for the people. I'm a single mom trying to leave something for my children. My overtime is anywhere from 40 to 60 hours and I still have a hard time getting a home. Though I leave this in GODS hands man or woman has to do their part.</p>

the process of testing needs to be reviewed. organizations that get compensated for finding violations creates an environment where they lead the owner/staff down a path to make a statement that incriminates themselves. taking complaints and doing an investigation is a much better process for addressing issues.
 The standard is not followed to the letter of law. Just go out and look at construction sites.
 the term Fair Housing is confusing for most people. Only lawyers and advocates use that term.
 The whole system is corrupt. The city knows this so why bother asking
 Tulsa's history of separation of uses and of people has created a culture in which diversity is something to which people pay lip-service. This is perpetuated by zoning laws that continue to have an erosive and ultimately catastrophic effect on the city's viability and on the health of urban neighborhoods.
 Necesitamos tener talleres de información de estos temas!

FAIR HOUSING IN THE PRIVATE SECTOR

Table B.4
Are you aware of any questionable practices or barriers to fair housing choice in the rental housing market?

City of Tulsa
 2015 Fair Housing Survey Data

Comments:

Add affordability. Most rentals are over priced. Need sliding scale. Need amenities that are not cheaply built, often using toxic materials, no trees , bare bones.
 Avoidance of renting to unmarried couple
 Barriers due to being incarcerated in the past.
 But they will deny for same sex couples
 By price, protected classes are steered from viable Housing options.
 Certain races are purposely only to rent in certain areas of Tulsa. North Tulsa is always on the bottom.
 Degree and type of felony committed and served time for.. some of us ARE trying to make a difference in our lives but blanket censorship and the word felony are a certain death failure to obtain housing
 Discrimination against elderly.
 discrimination based on sexual orientation, barrier- financial- not eligible for assistance but don't make enough money to rent a house in a safe area of town
 Divorced women; single women.
 Have been told by landlords they prefer white families compared to African American or latino families.
 I have seen and know of examples where qualified minority families aren't given the chance to rent or purchase a house where white applicants haven't had the same obstacles.
 Im sure this is still happenig based on conversations but I personally have not experienced it here since the 80s but I also now own.
 In certain parts of the City, rental units (new or existing) are stigmatized, and the renters area as well. The Tulsa City Council has taken action to oppose stop development of multi-family rental units (which serve a many segments of the population) - specifically in West Tulsa - because of this real or imagined stigma.
 Living in the area of Broken Arrow for the past 28 years, I have seen many rental fair housing available, and seen the majority rented or sold to whites.
 Low pay for the working poor under the evil right-to-work laws. Rents in Tulsa require two incomes, period. My wife is 100% Disabled under a ruling by Judge Volk yet receives no Disability pay because I make \$11.00 an hour as an Armed Guard. Can you support two people on that wage?
 Many property owners make their own determinations without any monitoring or consequence.
 Not the act of refusing to rent but at a higher monthly rental rate or with a higher deposit amount.
 People are reluctant to make their properties available to minorities or people with more than two children.
 Physical isolation in a sprawling city that has a very poor mass transit system.
 Poor education , food desert, few stores, few job opportunities, poor transportation , poor city services. Sloppy city contractor work.
 Property owners have little enforcement or consequence - they seem able to do as they choose.
 Refusal to rent and difference in terms and conditions of rental based on race. Charging more for deposit or refusing return of deposit based on race. refusing reasonable accommodations/modifications. refusing support animals. charging deposits for support animals. harassment for enforcing fair housing rights
 Refusal to rent based on religion, based on homeless status
 Refusal to rent due to race. Refusal to rent due to age. refusal to make reasonable accommodations such as adding curb cuts for wheelchair access or adding sidewalks to apartment doors.
 refusing to adequately maintain rental properties rented to individuals without immigration status or perceived to be without it due to national origin or language
 Refusing to rent to same sex couples.
 Removing a home from the market until the "perfect person " comes along.
 run down rental units not much choice in north tulsa
 Several larger companies break the law daily
 There continues to be descrimination based on disability, especially related to pets.
 Told a person of color that the house had been rented. Later that day to a white person that the house was available.
 too many people are priced out of the market or don't have choice of neighborhood
 Unintentional discrimination - a rental area that is expensive is unintentionally discriminatory against groups that have lower-than-average wealth. For instance, the average wages paid to a black man are just barely more than half the average wages paid to a white man. Ergo, in an expensive apartment complex, a white man is far more likely to be able to afford to live there.
 We still have landlords who discriminate against people and every day in the Tulsa world if you read the postings you can see discrimination based on familiar status, section 8 renters not allowed e.t.c and these advertisers are well known apartment

communities as well as condominium rental owners.
 You have to show yourself or call to get information for some places, they won't give pricing information at nicer places unless they hear how you sound or look first.
 A mi me negaron el alquiler de un departamento. Me di cuenta porque despues de mi alguien de raza blanca pregunto si habia departamentos en alquiler y le dijeron que si. Esto sucedio hace unos años.

Table B.5
Are you aware of any questionable practices or barriers to fair housing choice in the real estate industry?

City of Tulsa
 2015 Fair Housing Survey Data

Comments:
again I don't think that people have adequate choice black couple with two children looking in deep south tulsa residential area for home was turned away by the neighbors. reality company could not help. no city laws. discrimination based on sexual orientation Families given certain listings as the preferred rental locations in town or on property sites. I had a realtor tell me that they don't think we would fit in because there are no other gay parents at this school. Happened to be the agents school. I've heard that some home buyers of color are only shown properties in certain neighborhoods. I've heard this has happened in Tulsa Keep children out certain areas, eliminating transportation to better schools, no facilities Tty o discourage families with children. Not showing couples properties near schools because they have no children or they perceive them as pedophiles. only showing families of color houses in specific areas of town, telling people they wouldn't want to live or wouldn't be comfortable in certain parts of town. Only showing properties to minority families in areas that aren't necessarily safe for them or with school systems that will enhance their families way of life. racial and economic profiling real estate agents showing homes to certain sectors of the population in certain areas. Real estate professionals are generally not providing city of Tulsa options to people who are relocating, especially families with children. Realtors continue to steer based on location Realtors show people areas of the city based on class only Reusal to rent a 2-4 bedroom home to families, refusal to rent to certain races- African American or Hispanic, refusal to rent to certain age groups..... Same as above. selling cheaper to some people than others Showing you houses only in neighborhoods where they think you belong even if there are houses you can afford that are available in other areas. Steering homebuyers away from specific areas of town. steering. The overwhelming dominance of white, suburban, female real estate broker associates who are familiar only with white suburbia and who are unwilling to show potential buyers anything other than suburban homes. This is BS Wink and a nod on the part of realtors, to only show properties in certain school districts or in "better" or "white" neighborhoods. Yes, again in Broken Arrow. Yes, I have a friend that claims to not rent to people with children because of the destruction made to her home. Yes, people are likely to show properties where the client "fits" the neighborhood.

Table B.6
Are you aware of any questionable practices or barriers to fair housing choice in the mortgage and home lending industry?

City of Tulsa
 2014 Fair Housing Survey Data

Comments:
absolutely, i am a single woman...I have been a homeowner for 6 years and have never paid my mortgage late...i have tried to refinance my current rate which is 6.75%to a lower interest rate only to have no phone calls returned or an enormous amount of money/estimate for what it would cost to refinance.... Banks have too much control here and have no incentive to refinance for a lower rate...why would they, it would just reduce their profit??!!?... As well as higher rates to non-college graduates who are not Black or Hispanic. Blacks are denied loans that whites would be approved of. I bet there is a huge gap between minority homeowners and white homeowners. Checking accounts with low balance are charged monthly fees. 5figure and more are offered free checking, free money orders, as example. Credit scores are not the only determining factor discrimination based on sexual orientation Failure of Fannie Mae etc. to understand smart growth developments that include both condominiums and owner-occupied homes. Lenders' paperwork are geared entirely to (i) sub-divisions of owner-occupied homes or (ii) condominiums. Higher rates to women or racial minorities I have seen discrimination regarding interest rates to people who believe their credit is bad.

I know confidentially of a couple of mortgage companies that were discriminating based on race, considering Hispanics as high risk, but I believe they are in the process of making appropriate changes.

I seem to recall a news story about predatory lending practices toward hispanic families in East Tulsa. I don't know details beyond that.

Im always asked if im married and if so I must have my husbands "APPROVAL". But my husband as bought without me several times.

In the 1990s, considering Clinton et al were almost giving homes away to people that could not afford them, I would say poor and low income people got special treatment.

Interest rates shouldn't have anything to do with a person's color or sex. People with integrity who will pay should get good interest rates no matter what they look like.

It happens also because of credit status. Low income tends to have worse credit. They need lower rates, however to help make housing affordable.

Most new houses in minority area are vacant or have been within first five years based on predatory lending.

No that's illegal, but they do it to same sex couples refusing to use both incomes

Only showing homes that are above the seekers budget, knowing they cannot afford the homes shown.

Redlining seems to still occur.

The perception is they are higher risk

This has the same unintentional discrimination as above. The poorer a person is, the lower his credit score is likely to be, and the higher interest he'll have to pay. Illinois did a study of this phenomenon:
http://www.illinoisassetbuilding.org/sites/default/files/IMPACT_Trapped%20by%20Credit_2014.pdf

This is BS

Underpaid workers

unfair lending practices- Hispanic and Africna American population

Working in the community and giving referrals to single mothers, and minority clients, this is very common.

Table B.7
Are you aware of any questionable practices or barriers to fair housing choice in the housing construction or accessible housing design fields?

City of Tulsa
 2015 Fair Housing Survey Data

Comments:
<p>Formulaic, conventional, badly-built homes in suburbia that match a business model instead of meeting the greater need for enduring structures built in diverse, compact, healthy, walkable, fiscally sustainable neighborhoods.</p> <p>I recently shopped for an apartment and very few of the newer complexes had more than one or two accessible units. Few had plentiful handicapped parking or even reasonably accessible offices (I was with my mom and she has a hanging tag for her disability and walks with a cane.)</p> <p>Inaccessibility in regards to sidewalks and building near goods and services.</p> <p>Local homebuilders association has resisted the concept of choices in housing types - more town homes, more densely located versus single-family with large yards. Limited offerings from the marketplace present barriers to folks who have changing housing and transportation needs.</p> <p>No handicap accessible units, or failure to provide reasonable accomodations to current renters e.g bars in bathroom or ramps</p> <p>old properties are slowly grandfathered in, new properties are already in compliance</p> <p>Refusing reasonable modifications.</p> <p>There are some older properties that are narrow doorways but most arr willing to redesign what they can.</p> <p>This is BS</p> <p>Too many stairs in apartment complexes. I was in a wheel chair for 5 months in 2012 due to a foot surgery I had. I could not use my apartment bathroom or get into my bedroom with my narrow rental wheelchair due to the narrow doorways and hallway. I lived in my living room (bed moved in there).</p> <p>Tulsa is improving in this area but the accessibility has to be more than just doorways, folks have to be able to get from the curb to the door too! For example, neighborhoods with no sidewalks.</p>

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

City of Tulsa
 2015 Fair Housing Survey Data

Comments:
<p>Areas of the city are redlined as high risk but by zipcode</p> <p>Certain areas are RED LINED</p> <p>Excessive rate structures.</p> <p>higher cost by zip code</p> <p>Higher insurance rates for living in relatively "poor areas". This discourages any new homeowners.</p> <p>Limited policies, coverage and higher rates for women and minorities</p> <p>Limiting policies based on location</p> <p>Limiting policy coverage for non-college graduates who Are Not racial minorities. Under Federal Lending Laws, minorities are given preference over others. In my experience.</p> <p>Not surr now, but I remember in the 90s a house we owned had "North" in the address and our insurance notified us we were being cancellef for that readon and needed to find new insurance.</p>

Redlining seems to still occur.
 they base our rates on the area we live in.
 Unofficial redlining still seems to occur.

Table B.9
Are you aware of any questionable practices or barriers to fair housing choice in the home appraisal industry?

City of Tulsa
 2015 Fair Housing Survey Data

Comments:
<p>A home with comparable footage and amenities to a southside home only being on the north side, being seen as less desirable, and therefore worth less.</p> <p>area demographic and racial diversity is a constant divide in the entire Tulsa community.</p> <p>Definitely little one bedroom in white area third more expensive than minority area, property gain value if whites move in and lose value if minorities move in.</p> <p>Given the quality of available housing supply in north Tulsa, appraisers seem to have problems with finding comparable sales. No new sub division development in the area since the 70's with Gilcrease Hills.</p> <p>It's definitely a problem in Tulsa.</p> <p>knox does this every day during inspections.</p> <p>Lower appraisals for new construction homes North and East in predominantly black/ hispanic neighborhoods.</p> <p>Lower home values based on the area of town where the home is rather than the quality of the housing.</p> <p>lower values by zip code</p> <p>Redlining seems to still occur.</p> <p>the example given</p> <p>The rules governing appraiser evaluations do a great disservice to builders trying to help boot-strap a neighborhood into revitalization by building good-quality homes in blighted, neglected neighborhoods. Poor 'comparables' make it difficult for potential buyers to get the mortgage amount they need in order to buy a home in such a neighborhood. This makes it very difficult for the developer and builder to make a living.</p> <p>This is a HUGE problem. Every time I consider refinancing I know I have to pay out of pocket for an appraisal that is only good for 6 mos. but I might get an appraiser that spends 15 min at my house and there is no accountability for his oversights. Still have a mortgage with an interest rate that shouldn't be so high. Can't refi due to low appraisal and can't afford to get do over. Hear same from other people too.</p> <p>Told a family that the value was less in North Tulsa.</p> <p>we live in north tulsa. bad area of town.</p>

Table B.10
Are you aware of any questionable practices or barriers to fair housing choice in any other housing services?

City of Tulsa
 2015 Fair Housing Survey Data

Comments:
<p>feel free to deny the gays anything you want because it isn't illegal</p> <p>Good, service or benefit that keeps poor whites from moving to minority neighborhood.</p> <p>Harassment and retaliation for enforcing fair housing rights.</p> <p>Horrendously out-dated 'zoning' that requires acres of off-street parking makes the development of economically viable, healthy, mixed-income, fiscally sustainable neighborhoods virtually impossible to achieve.</p> <p>If whomever can afford to live in the neighborhood and contribute to the local economy, then they should be able to live there.</p> <p>However, there should NOT be any subsidies (especially from Fed) for people to live in said area. NO HOUSING REDISTRIBUTION.</p> <p>Low income tend to have criminal records but need to be given a chance to improve their lives so they don't re- offend. Their children are affected by this.</p> <p>Redlining seems to still occur.</p> <p>Requirement that disabled pay for installing ramps to give access to essential services.</p> <p>services for people with disabilities are limited</p> <p>Way way too many Section 8 housing in Tulsa. Has ended up ruining some neighborhoods that were middle to upper class neighborhoods before Section 8, like the 61st & Peoria area, Southern Hills - 61st & Lewis areas. East Tulsa was middle class, now ran over with Hispanics, probably many illegal and of course higher crime now. Now 41st & Garnett having a lot of crime due to Section 8 apartments in the area.</p> <p>you are asked what zip code is the property in</p>

FAIR HOUSING IN THE PUBLIC SECTOR

Table B.14
Are you aware of any questionable practices or barriers to fair housing choice in land use policies?

City of Tulsa
 2015 Fair Housing Survey Data

Comments:
<p>City holds vacant land taken in minority area, don't have knowledge or will to develop. Mostly failed projects by Urban Development. Conventional zoning naturally accumulates multi-family housing in limited areas. This is why we can see large numbers of low-income apartments clumped together in the southwestern part of the city (61st & Peoria through 81st & Riverside). Depends on who owns the property and if they are friends of the mayor, government projects with high crime rates not enough police/security</p> <p>Great preponderance of zoning promoting "suburban/auto oriented" housing and general development. Not allowing mixed use, living over or next to business/retail/restaurant/light industrial, etc. This and other land use policies limits transportation/access to persons of disability and lower economic status. Land use policies are geared towards promoting auto centric development and limiting transit use and transit oriented development.</p> <p>I am aware in Tulsa County Broken Arrow area residents kept a affordable housing community from being built. Not sure if this applies but it is an example that affordable housing is looked down upon and appears to devalue property and is pushed out. I don't believe it is the actual city violating fair housing policies in land use but homeowners not wanting apartment communities in their neighborhood force apartment communities to be concentrated in a specific area.</p> <p>Inaccessibility to goods and services for children, elderly, disabled. Not enough walkable areas for these people.</p> <p>Isn't the very nature of land use policies to identify where certain types of housing will go versus others? Multi-family housing is not allowed to be built just anywhere. But I do not believe that is necessary a bad thing. There must be some sense of order to a city's layout.</p> <p>Look at the zoning map for this answer.</p> <p>Multi-family housing is largely discouraged in Tulsa. Most neighborhood associations equate multi-family housing with crime and poverty. This sentiment is echoed by the media, and is the attitude of many local leaders and elected officials.</p> <p>NIMBY- Occurs in predominately richer neighborhoods and refusal to have rental properties that are receiving tax credits due to the thought that it will lower property values.</p> <p>Out-of-date zoning laws separate uses, and also separate people who own their home from people who rent. These zoning laws have led to a pervasive bigotry against people who rent in Tulsa. Residents of suburban sub-divisions frequently protest at the construction of apartments adjacent to the sub-division. This situation is perpetuated by an incompetent, mis-guided Tulsa Metropolitan Planning Commission (TMAPC) that is widely regarded as heavily biased in favor of developers and dominated by a primitive perception of 'property rights'. It invariably favors the owner applicant in cases that come before it, and ignores the surrounding neighborhood. Its membership is dominated by white males, with a small minority of women and no African Americans or Hispanic people. Finally, it largely ignores the intent of the City's Comprehensive Plan. The City's Mayor has taken no steps at all to improve this situation - quite the contrary.</p> <p>Policies and process in this area are difficult for the average citizen to understand.</p> <p>Some members of the City Council have vocally expressed a need to stop adding multi-family units within their districts. "Put them someplace else" is a common position. They don't oppose the MF units per se; they oppose the residents. In other words, there is a strong prejudice AGAINST renters, regardless of the price point.</p> <p>There are certain Tulsa neighborhoods that have an overwhelming concentration of multi-family housing, such as 61st & Peoria and 41st & Garnett.</p> <p>There is great opposition to building affordable housing in areas other than North and West Tulsa which are already over saturated. This creates pockets of housing in high crime areas which are the only affordable or available. Some people are afraid to rent there. Too much multi-family housing. Way over built in the 1980s and 1990s. Which is one of the reasons for so much Section 8 housing now.</p> <p>zoning is irregular and limits development, neighborhoods try to keep low income development out</p> <p>Zoning laws typically cluster multi-family housing in mixed-use development which is not happening, basically at all, in Tulsa.</p> <p>Zoning restrictions based on housing type and lot size that lead to segregated neighborhoods.</p>

Table B.15
Are you aware of any questionable practices or barriers to fair housing choice in zoning laws?

City of Tulsa
 2015 Fair Housing Survey Data

Comments:
<p>Again, zoning laws such as minimum parking requirements in most of the city for businesses, directly effect transit options, thus limiting housing choices. Just as it's recognized that laws like minimum parking requirements facilitate auto use and auto centric development, there needs to be more recognition that there needs to be zoning laws in place to facilitate transit and transit friendly development. Transit can not work effectively or efficiently under the current zoning. Housing and work/shopping/social choices are greatly limited in this environment.</p> <p>as above, there is not a lot of flexibility for developers, zoning can make development impossible</p> <p>For a city to be successful, segregation of types of residential units have to be eliminated, integrating all types with commercial zones to cultivate an active community that encompasses all residents.</p> <p>Group homes have generated a lot of misinformation on both the potential residents and the ways the properties are managed. Group homes tend to be discriminated against and stereotyped</p> <p>I don't believe it is the actual city violating fair housing policies in zoning but homeowners not wanting apartment communities in their neighborhood force apartment communities to be concentrated in a specific area.</p>

I know that if a group wants to make a single unit into a group home they have to go to zoning committee to get a permit.
 NIMBY
 North Tulsa developed as bedroom community. Retail space nonexistent or too expensive.
 Oh, this is broken every day
 Placement of group homes must meet certain zoning standards. All land uses are subject to certain locational requirements or standards.
 Policies and process in this area are difficult for the average citizen to understand.
 refusal to allow group homes in neighborhoods. Such as the Tulsa Day Center project. a lot of ignorance to laws within the public and City of Tulsa departments that should have addressed these issues.
 Requiring a special exception from the Board of Adjustment for certain group homes is an impediment.
 same as above
 see above
 See above. Our zoning laws currently favor one type of house: the single-family dwelling with a large footprint, no sidewalk, poor access to public transit, etc. We have very poor diversity in housing choice as a result.
 Some property is zoned for commercial use making it too expensive even though it's been sitting vacant for years.
 The Planning Commission (TMAPC) has done everything it can to diminish and destroy the City's most promising recent initiative: the establishment in 2011 of a form-based code in a small section of a near-downtown neighborhood. The form-based code is intended as a catalyst for the revitalization of a blighted neighborhood into a much safer, more walkable, healthy, more compact, more diverse, inner city neighborhood that is able to support a locally-owned, healthy grocery store within walking distance of many homes. Establishment developers and attorneys who make a good living from current zoning laws have fought energetically and successfully against the expansion of the form-based code to more of the neighborhood.
 To my knowledge, the zoning code does restrict where certain home sizes and types can be built. Technically, this would be an impediment or barrier to those respective types of housing, but I do not believe that is bad. There must be order to a city's layout. Zoning being changed without nearby homeowners being notified until it's too late.

Table B.16
Are you aware of any questionable practices or barriers to fair housing choice in occupancy standards or health and safety codes?

City of Tulsa
 2015 Fair Housing Survey Data

Comments:
<p>Area nursing homes are awful, they are housing units and never inspected bankers, owners, landlords, etc....look the other way. Cars on lawns, trash in yards, lawns unmowed.especially on the east side. Codes are inadequately enforced in North Tulsa. Health and safety code enforcement should have its own department and full-time staff and there should be some penalties for violators. Codes are not enforced in areas of low economics and based on race. Codes being inadequately enforced in immigrant communities. Codes inadequately enforced in low-income communities of color and immigrants. Definitely a problem. 3 or 4 or more families living in one home. Neighborhoods going downhill due to rental homes owned by slum landlords. Eliminate code enforcement rely on heavily disadvantaged areas to monitor itself. Beat down with inadequate services and benefits Failure to educate and enforce housing codes which means landlords can rent substandard housing e.g. Habitat for Hope who is a well known slumlord yet the City has failed to enforce / have any teeth to stop his substandard rental housing stock. how can it be legal for an 6-8 person family to reside in a home with 2 bdrms and 1 bath. with all adults in the home working and still receive state aid and benefits? I have known a person that lived in a rental property in a bad area of town that had roaches infested throughout the entire building. No matter how much she complained nobody would do anything about it. I have noted many ethnic businesses and family owned businesses that have failed to launch because of "new" codes that other business owners do not heed. I live in the Admiral/Lewis area and the majority of rental property is run down and in great disrepair, yet rents are just as high as in better areas of town. We had to go 6 days without water recently due to the slumlord not wanting to fix the main supply line. Half of the electricity is out due to damaged wiring under the house, but I'm still required to pay rent or be evicted. Just wrong. I have no recourse except small claims court. I'm not certain standards are always imposed at any level. My strong sense is that there are many, many homes in Tulsa that fall well below acceptable standards of health and safety. I worked as a volunteer in a Sub-Standard Housing study by the City of Tulsa under a former Mayor. Nursing homes need to be looked into. People shouldn't feel bullied because they are immigrants. Everyone in this country are immigrants except Native Americans. Step lightly. There is a property in West Tulsa that the THA operates which removed the laundry facility so now there are multiple families with limited transportation that are not able to wash their clothes. Dirty clothes cause for unclean environments. there is not even code enforcement We see more of codes being unevenly enforced, especially in Section 8 housing inspections. You can provide a great house and have an inspector mark off all kinds of things and see another Section 8 house approved that is a dump. It makes housing owners not want to try and do well by renters. Yes, in working with immigrants in the community there are situations where many codes are enforced on family members living in the home, that there are too many in living in the home. furthermore; not realizing that the culture is known to having many children.</p>

Table B.17
Are you aware of any questionable practices or barriers to fair housing choice in property tax policies?

City of Tulsa
 2015 Fair Housing Survey Data

Comments:
<p>A small landlord is less likely to receive incentives. Lack of education to the building community is a huge barrier. They need to know the incentives available to them. many areas of Tulsa are unfairly taxed. Need more tax incentives to help disabled and help families care for them easier at home. No curbside access Not being done often enough. The slumlord I rent from put in an illegal heat pump/ air conditioner 9 years ago but the county assessor lists the property as having NO heat/air system! Redlining seems to still occur here. TIFs can provide incentives, there is not enough affordable housing and the City of Tulsa does not provide funding, other than federal pass through dollars</p>

Table B.18
Are you aware of any questionable practices or barriers to fair housing choice in the permitting process?

City of Tulsa
 2015 Fair Housing Survey Data

Comments:
<p>complicated and cumbersome - enough to stop people from completing projects Far too many permits Lack of delivery of information improved but nobody knows that, failure to overcome past discriminatory practices lack of information to the public or education. More languages are needed. Perhaps if you don't speak English, you should not be building since you cannot possibly be aware of the building codes in the U.S. Permitting is such a specialized issue that anyone hoping to do anything really needs to hire an outside company, such as a contractor, who already knows all of the laws surrounding the permits. This encourages improvements for the rich and discourages improvements for the poor. A low-income household with a low-price home that wants to remodel it to improve its sales price would be hard-pressed to do so legally. Policies and process in this area are difficult for the average citizen to understand. Some get permits and some don't no set definition on what qualifies. This is the United States of America. Our language is ENGLISH. People that speak other languages need to learn our language or go back home from where they came. This seems discriminatory To my knowledge, housing documentation is not offered in any language other than English. Very unfair. Hard for people to stay competitive if they are following permitting rules and others are not simply because of language barriers. There are plenty of language resources here now to translate anything and make it INSTANTLY available. Ask a teenager to post it for you! Yes, this is a very highly huge barrier, not implementing documents in alternate languages, and this goes all the way across the board in the fair housing act. El lenguaje</p>

Table B.19
Are you aware of any questionable practices or barriers to fair housing choice in housing construction standards?

City of Tulsa
 2015 Fair Housing Survey Data

Comments:
<p>City inspectors sometimes never get out of the vehicle to make final approval on new construction or rehabs Development and compliance need to be on the same page lack of education and or information to educate the builders or the public. Need laws. Otherwise construction would be even more poorly built than they are now. No curbside access on sidewalks..having looked at construction. old plumbing see above This is another lack of confusing guidelines in construction accessible housing. The Fair Housing Act needs to realize that many families living in these areas or wanting to have access to the Fair Housing Act are not professors, lawyers, and the language of the documents are way above their understanding. Honestly, I who has a Masters in Counseling have a hard time explaining documents to my clients I'm working with. Too many construction rules in Tulsa. Homeowner associations should have preference</p>

Table B.20
Are you aware of any questionable practices or barriers to fair housing choice in neighborhood or community development policies?

City of Tulsa
 2015 Fair Housing Survey Data

Comments:
<p>A huge problem is that while the City adopted a very good Comprehensive Plan in 2010, the current Administration and the Planning Commission, and I suspect the Utilities Authority are failing to implement it with any energy. This is exacerbated by a failure to invest in mass transit - in which regard Tulsa falls way behind peer cities - and has no predictable source of funding for mass transit. The current Administration seems to see transit through an outdated prime as a 'subsidy' - failing to recognize that the City is wasting more and more tax-payers dollars on subsidizing the automobile through endless, ruinous road-widenings. Thus land-use planning and transportation are not integrated as they should be, and the City is becoming less and less accessible to people on lower incomes. This is resulting in a growing number of areas characterized by poverty, poor health outcomes, poor educational outcomes, and so on.</p> <p>Again, see above: our city encourage sprawl (building new single-family dwellings in detached undeveloped suburbs), and discourages infill or adaptive re-use development. Housing in more dense parts of the city is discouraged.</p> <p>Formed bases codes have been postponed implementing for years in the Pearl District. why?</p> <p>High quality developments are expected and supported in south Tulsa. In North and East Tulsa, the expectations are much lower and the industry plays along.</p> <p>HUD/ Federal policy to re-direct federal Sec 811/202 funding from low income housing needs to blighted neighborhood improvements (with little housing funding), which portends political objectives over citizen needs.</p> <p>I don't believe it is the actual city violating fair housing policies in neighborhood development policies but homeowners not wanting apartment communities in their neighborhood force apartment communities to be concentrated in a specific area.</p> <p>If there are community development areas, I am not aware of them</p> <p>It is too easy for developers to overrule neighborhoods who wish to maintain their neighborhood characteristics.</p> <p>Limited areas available for new home construction. Tulsa Housing Authority has been primary entity to supplying available building sites.</p> <p>neighborhood planning is designed to keep people out</p> <p>not enough safe good housing in north tulsa</p> <p>PlaniTulsa and central planning set rigid policy</p> <p>Policies and process in this area are difficult for the average citizen to understand.</p> <p>Poor city services, past discriminatory practices not overcome, lack of federal enforcement. All development in white areas.</p> <p>Relegation of apartment housing to concentrated areas.</p> <p>This is a big issue in Tulsa that is ignored and we have parts of Tulsa that have no incentives or a focus form the City.- North Tulsa. This is being forced upon us through the iPlaniTulsa Small Area Plans. In accordance with the overall Agenda 21. I AM TOTALLY OPPOSED</p>

Table B.21
Are you aware of any barriers that limit access to government services, such as a lack of transportation or employment services?

City of Tulsa
 2015 Fair Housing Survey Data

Comments:
<p>A lot of things are moving to paperless and automated but poor and elderly won't be able to access.</p> <p>access to transportation is inadequate city-wide</p> <p>An actual 24/7 mass transit system. The one you have now is a joke.</p> <p>Better bus routes through populated areas.</p> <p>Both mentioned and poor schools, no code enforcement ,inadequate public transportation</p> <p>bus line schedule got cut back hard to get places without lots of time</p> <p>Bus routes are not coordinated, so long waits on transfers.</p> <p>Bus service in Tulsa makes it difficult to impossible to hold a job where you may need to work nights or weekends.</p> <p>bus system is not user friendly</p> <p>But we are not here to cater to everyone</p> <p>Elimination of city bus services</p> <p>food deserts. lack of public transportation. poor schools in certain areas.</p> <p>High poverty areas need transportation access because they don't have vehicles, ex: 61st and Lewis to riverside</p> <p>Inadequate public transportation that runs too infrequently and doesn't cover sufficient areas of town. Lack of materials in Spanish and other languages. Lack of bilingual staff in government services. Lack of ability to take a driver license test in a language other than English.</p> <p>Lack of a decent public transportation system, lack of employment barriers in some areas, lack of grocery stores, gas stations and other conveniences seen in other parts of Tulsa- This basically deprives and entier community of decent tax paying citizens.</p> <p>Lack of a robust public transportation system to serve all housing areas definitely serve as impediments. If transit went more places, people would have more housing choices, since it would be easier and more cost-effective for them to get to work and other services.</p> <p>Lack of adequate and reliable public transportation</p> <p>Lack of public transportation is certainly a big one, especially given the fact that major offices are located many miles from where the majority of the residents who need access to them live. And, since many of these offices are only open during normal business hours or only accessible by transit during normal business hours, a person might have to take the day off from work to get to them.</p> <p>Lack of transportation- City transportation is limited and inefficient in many low income areas</p> <p>lack of transportation, lack of services in areas of town with low income</p>

Limited access to public transportation and no bicycle lanes for people that can not afford automobiles or automobile insurance.
 Limited city buses
 Limited or lack of after 8-5 work day hours and weekend bus transportation
 Limited public transportation; locations, length of time between pickup/drop off at locations, hours of bus operation.
 Most people have cars or knows someone that has a car that would take them where they need to go. There are also buses and taxi cabs. As a last resort, a person can usually walk unless elderly or disabled. If a person wants and needs a job, they will find a way to get to the employment services.
 no public transport in Turley and poor public transport city wide
 Poor transportation system. Lack of employment services in Tulsa, especially for youth and especially in North Tulsa. Workforce Oklahoma is a joke and needs to be held accountable.
 Public transportation access continues to be an issue especially with the recent cuts to routes. Also the lack of referred services in the area where people live, for example Morton refers most of its specialty followup services, PT, OT, etc, to providers in S. Tulsa and consequently many people do not pursue care.
 public transportation is terrible
 public transportation is very limited throughout the city of tulsa
 Social services are spread far and wide across the city. We also have a very poor public transit system, and currently no political support for the city's comprehensive plan, which has called for dense development along transit corridors.
 The city bus doesn't offer services after certain hours
 The public transit system in Tulsa is highly inadequate. The travel time is excessive and not designed to accommodate hours that people work (evenings and weekends)
 The transportation options in Tulsa are somewhat limited via transit (bus) due to limited funding for transit. Thus, frequency, coverage and hours of operation may not be optimized. The City has provided funding to improve/optimize transit service in specific higher density corridors.
 There is a need for expanded transit services. This is a city-wide issue.
 Transportation
 Transportation and employment services are lacking.
 Transportation is extremely difficult in Tulsa - bus system needs to be updated and improved.
 Transportation to outer tulsa county areas like BA community
 Tulsa has a history of geographic racial segregation, perpetuated by 'urban renewal' in the sixties; and the areas in which African Americans are concentrated are mostly food deserts, with few civic amenities, poor sidewalks and with very low levels of public transit services. (The Transit system itself does its best with a threadbare budget; for comparison, note that Austin, Texas invests five times as much per capita as Tulsa, Oklahoma in transit. Tula has no dedicated source of funding, making it impossible to plan ahead as it should do.)
 Tulsa has fairly hard to understand city website and for someone new in town the public transit system is lacking in routes and options for rapid transit and people getting to higher education options.
 Tulsa's land use and zoning laws effectively make good urban/transit/pedestrian friendly development so impractical as to be illegal.
 Tulsa's public transportation system is woefully inadequate. Buses are infrequent, and don't run at all at nights and weekends.
 Entire neighborhoods lack bus service. The Lift service is very user-unfriendly and priced out of the reach of many who need its services.
 Very poor public transit.
 White males that truly need help to regain their lives are virtually left out.. wait three to ten years for a scrappy lil apartment with rules and curfews that limit productivity and maintaining a normal working life
 Yes, I'm very aware of barriers to access government services, such as transportation and employment services. In working with the community for 28 years this is a barrier for the majority, and when trying to communicate with government services is such a barrier many give up on employment services. Many of the people working in these areas need to take respect, and empathy classes. If government people working in these services would treat people with respect, we would have a lot more people in jobs.

Table B.22

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

City of Tulsa
 2015 Fair Housing Survey Data

Comments:

Ability to deny rent to same sex couples.
 cash tall grass and weeds snakes that come outof the grass landlords not keeping up thair property
 city leaders decide what is in the best interest of businesses that donate to their position rather than a community vote or transparency of slated budgets for impoverished areas or low income areas. the money needed is moved by those made promises to or city leaders tell the public no,with no real reason or explanations,ever
 Criminal background intolerance
 Don't put people into "classes" and then stick them in huge housing projects or same neighborhoods. No one should really ever know if a property is section 8 eligible unless they ask. It puts a stigma on the people who live there. Payment arrangements should always be confidential, even if you get public assistance. Just because assistance is a result of public tax payer's \$ doesn't mean the public gets to know how someone pays their rent.
 health care not integrated, access is poor. Uninsured use the ER
 Just seems to be a lot of trashy people around now days. I'm very disheartened.
 Many of the construction limitations.
 money diverted to other parts of tulsa than north tulsa
 More and more landlords are choosing to restrict applications based on having a Felony record, regardless of how long ago it occurred or the nature of the offense.
 NIMBYism in locating low-income housing throughout the city
 Old city employees trained to be discriminatory by "doing business as usual".

Policies and process in this area are difficult for the average citizen to understand.
 Poor sidewalks and lack of cut outs for wheelchairs or grocery carts
 Rapid Transit could be a game changer. How about Sunday bus transportation.
 The biggest obstacles to progress by Tulsa are (i) a failure by the current Administration to either understand or implement the City's Comprehensive Plan with any enthusiasm, despite his under-resourced Planning Department's best efforts; (ii) an incompetent, inept, lazy, out-of-date and skewed Metropolitan Planning Commission; (iii) a resistance from the City's Mayor and Council to the need for substantial investment in mass transit; (iv) resistance by senior Public Works officials to implementing the promising new 'Complete Streets' policy adopted in 2011 (which applies 'context-sensitive solutions as the process to deliver complete streets); (v) the perpetuation of a discredited and fiscally ruinous road-widening 'strategy', which is making Tulsa more and more car-dependent; (vi) a failure by leaders to evaluate candidate public investments through the prism of 'sustainable return on investment' (a methodology for which funding has been allocated, but on which work has not begin); (vii) a failure to understand or embrace the concept of 'planning' itself: Tulsa has far fewer Planning staff compared to peer cities; (viii) complete denial of climate change, with no initiative in place to develop policies and practices to address this major threat to all residents, particularly those with poor access to city services; (ix) no concerted response or action on reducing the level of toxic, stormwater run-off (ultimately into the Arkansas River) and no substantive action on resolving Tulsa's non-conformance to the Clean Air Act. All the above have led to a city that is steadily becoming less equitable, delivering poorer services and fewer benefits, at greater cost, through outdated policies, to its residents.
 The only act of barriers to fair housing choice would be what I've seen and lived in the area of Broken Arrow.
 The Tulsa Comprehensive plan is way past overdue and yet we have not seen any changes or a focus on what the Citizens stated which was to focus on rebuilding North Tulsa, yet we have TIF districts focusing on the ball park area and malls and no development North.
 There are so many competing rules that it is almost impossible to avoid breaking one of them.
 there is no educational support or an available means to learn and understand housing and what it takes to buy a home or work towards owning one.
 This is being forced upon us through the iPlaniTulsa Small Area Plans. In accordance with the overall Agenda 21. I AM TOTALLY OPPOSED Fair housing is an agenda for Redistribution of housing. If the liberals want to redistribute housing, then let them relocate into the "rich" neighborhoods, NOT the upper middle class neighborhoods.
 You can object all you want it does no good.

Table B.23

Does the quality of the local public school district affect the location of where households choose to live??

City of Tulsa
 2015 Fair Housing Survey Data

Comments:

Absolutely! Bring back magnet schools at the elementary school level! Parents were more involved (at a most critical age) and students were more driven to achieve. If a kid was at a lower performing school but was trying to get into a magnet school, they were still driven to achieve so their chances to move into the magnet school stayed good. BTW High School must be great, if kids aren't there on first day of school they have to reapply. Does any other TPS high school have that rule? Tulsa school districts - Jenks is good, Union is Fair, TPS is struggling.
 Actually there are certain schools that perform better than others within the same district. It is my opinion that all schools are not supported the same. Some school districts insist on raising the standards. Jenks, Owasso, Broken Arrow and Union school districts have made major changes to elevate the success of the students and Tulsa appears to be lagging behind except for two schools. If the same objective was implemented and tailored to fit the needs of each school, test scores would improve and certain schools would not outperform others. The money should be distributed the same and the staff should be required to move around so as to level the playing field when it comes to funding and education. All children deserve to learn in the best schools.
 All of the school districts are good, as in they are at least attempting to educate our children. Obviously, with school dollars being tied to the wealth or lack thereof for each district, some will appear to have more to offer in the quality of the teachers and staff, the facilities and the subject matter. Public schools should be tied together! Duhh! All taxes/or school funding collected should be evenly distributed to ALL PUBLIC SCHOOLS! How can we call it Tulsa Public Schools when some schools get less than others? It should be West side of Tulsa Public schools and East side Public schools, etc..etc.. The way its done now!
 All really poor but Northside have worst scores and reputation.Minority area decent school or magnets.
 almost all of the suburban districts are considered better than Tulsa Public Schools.
 bonding capacity and parental involvement enhances quality. the suburban districts are better in this area than Tulsa and promote neighborhood or community school experience vs. the overbuilt public school system in Tulsa.
 Booker T. Washington is perceived as good. McLain as poor. Eisenhower as good. Jenks as good, Union as good.
 citizens tend to reside where the high performance neighborhood schools are
 Districts like Jenks and Union are perceived as being better than Tulsa schools and families will voluntarily choose to live in those districts rather than Tulsa.
 Don't live in Tulsa.
 Everyone either tries to live in the magnet school districts, or uses someone else's address to get their kids into a different district.
 EX: I live in the Central High district, but drive my son to Skiatook and enroll him with my parent's address because I couldn't find an affordable house in a good TPS district.
 everyone talks about the north side of tulsa area schools lacking funds teachers over crowded class rooms. we are paying taxes for our area. where does that go??
 families need to be able to choose neighborhoods near the school of their choosing
 Families with school aged children choose housing based on State/Government educational reports. The resale and occupancy rates are favorable. Remington, Park, and Robertson Elementary schools receive Title I funds. Potential homeowners/renters would not "choose" the area due to "poverty" stigma.
 Generally
 Good Jenks TPS poor

I arrived in Tulsa this summer and by reading the paper and talking to my apartment neighbors (I ended up in Union schools/South Tulsa) few would even consider moving north into Tulsa Public Schools. I don't have kids, but if I did it would impact where I would live. Public schools are the lifeblood of a community. If we don't educate our children effectively, then the future is very uncertain. My workplace colleagues with young children mostly live in Broken Arrow and selected their homes entirely based on school. I don't know that any districts are good and poor based upon district. My experience has been that schools where parents are involved in the schools are better schools. Low-income families where both parents work and do not have paid time off or do not have adequate transportation to the school can affect how involved parents are. Affluent flight to suburbs and private schools continue to challenge urban school districts.

I suspect that it does, but have no data confirming this. It may also be due to property values or housing market supply.

If a parent can afford to live in a good school district they will move there. It is a shame that not all public schools are the same.

Let's face it, Union and Jenks have reputations for much higher academic excellency than Tulsa, and residents often move to areas serviced by these schools in the hopes of having their children serviced by those academic standards.

Major part is income level 1st and school district second.

Many people are buying in the Jenks, Union and Broken Arrow districts because of the perception those school districts offer a higher quality education than Tulsa. Even in Tulsa properties in certain school attendance zones (e.g. Edison, Patrick Henry, Eliot, etc.) draw a higher price because of the perceived desirability of the feeder schools.

Mid town, brookside, good. North Tulsa, 51st - 61st just a few miles away are poor. Also areas north of 11th street are poor.

Most cases this applies other than magnet. Caring parents are looking for best schools within affordable safe housing.

Most families tell me "Anywhere but Tulsa" because of the schools. There is HUGE discrimination as children are constantly re-districted in many of the TPS that were designed to bolster the community in which they live. People rented or purchased homes because of a certain school district only to be booted out later. This occurs mainly in central Tulsa and North Tulsa.

most people would like to live in the best school districts

Most renters or homeowners would like to have access to better schools with higher academic standards. Such as those in Bixby, Union, and Broken Arrow.

Most TPS districts outside of Union are poor

Multiple school districts compete for families and have vastly different demographics and tax bases.

No one wants to live in a district with poor quality schools....lack of good education...crime is higher,

No one wants to live in a dumpy neighborhood with poorly run schools.

No one wants to live in the 74106 or 74126 zip code area because the public schools in that part of town have such low test scores.

Parents flock to apartments and homes in the Owasso, Jenks and Union school districts.

North Tulsa has been labeled as having poor quality in all the schools. However, TPS in South Tulsa are labeled to be good.

North Tulsa schools have been said to be the worst schools in the district so when people relocate to Tulsa, they are steered toward South Tulsa, or the Jenks area.

Northern schools seem to have less quality education standards.

Of course, and very much so. Most white people want to live in a suburb where their children can go a semi-decent public school or have easy access to a private school. Speaking as a white parent of a child who went to a public school in north Tulsa (where many African American Tulsans live) the 'magnet' system seems to have had some effect in attracting white children to create a more diverse school population. Booker T. Washington High School, attended by our son, has a very good reputation, though it shows the stresses and strains of disinvestment by a very conservative State Governor and State Schools Superintendent.

only people of means can choose which school district they live in.

Our housing market is often driven by school district. The buyers perceived quality of schools. Often they want to purchase in Jenks, BA, Union, Bixby anywhere but Tulsa, because they have heard that their test scores are lower and problems in the school.

They judge all schools within the district, even though say, Carnegie or Lee have high test scores. They see Jenks and other districts that have excellent test scores and rated high within the community.

Schools in low income neighborhoods are poor performing schools. They lack quality teachers and resources. In the "District of Choice" these schools end up with high numbers of low income and learning disabled students because parents who can afford to drive their kids to school take them to schools in other areas. The families who rely on busing are forced to use the under performing and failing schools.

Single moms with young children are among the poorest in Tulsa county yet they are often forced to move north of Pine to find affordable housing, where the schools have some of the worst report cards in the district and the area has some of the highest crime rates.

South is good north is bad

South side better than east and north

South Tulsa Schools have always had the best facilities, teachers and educational options. Children should not have to suffer and go to schools with lesser facilities, options because they live in poor neighborhoods- North Tulsa Schools with the exception of Booker T and Carver. neighborhood children should attend these schools in their neighborhood and not have to bus out of the district. Children should have an Equal Educational Opportunity.

Test scores and the negative of student in the larger school district versus suburban schools-how is the teaching so different but yet all teachers/principals have the same degree.

The quality of education varies greatly between districts and within districts. This has an impact on both cost and availability of housing in the more desired locations. Surrounding suburbs are generally considered better than TPS. Within TPS more midtown and south locations are perceived to be better.

The Tulsa Public School System doesn't have the greatest reputation. And why does the City of Jenks, Oklahoma have schools in the city of Tulsa, Oklahoma city limits. Why do we have Union Schools in the City Limits of Tulsa, Oklahoma?

There are no strong area schools.Thoreau, Eisenhower, Booker T are all strong schools that use guidelines in choosing their students. (By the way, you have used both "the" and "these" in the above sentence before the word "factors".I suggest better proofreaders,especially in a government document)

there is a negative perception of TPS which tends to push new neighborhoods and "family-oriented" developments into south Tulsa and adjacent small cities

Think about it, if you have gangsters smoking at school do you think I would send my kid there, uuuhhhmm NO

This goes without saying. When there are only 5 A elementary schools in the City and none of those in the most needful areas how are we going to attract leaders/developers back to the community?

Tps schools in north Tulsa don't get proper funding for materials or highly qualified teachers

Tulsa is known to have better schools the farther south you live. Everyone from Tulsa and the surrounding areas know (or claim to know) that North Tulsa is not where you'd prefer your children to go to school.

Tulsa Public Schools have a stigma of being bad. Many residents and realtors leave the City of Tulsa specifically for the schools in outlying communities. TPS's 'district of choice' has had a profound (negative) impact on neighborhoods and housing. Prior to that, schools were centerpieces for neighborhoods and local residents identified with them, proudly maintained their property and lived as a community with their neighbors. Now, nobody knows their neighbors and their kids to go schools on the other side of town.

Tulsa Public Schools is a joke. Kids can't pass 3rd grade reading exams because the kids have too many days off, to accommodate overpaid/over insured teachers who only show up for 7 months but get paid for 12 months.

Union School districts are the best in Tulsa, Booker T is a fabulous High School all other Tulsa schools especially what used to be McClain are known to provide a poor education as well as almost all Tulsa elementary and up schools

Who wants to send their kid to a stupid school.

With minor exceptions, the entire Tulsa Public School system is inadequate. This, in my opinion, has been the primary reason that people have fled to the suburbs for housing needs and why the suburbs have flourished.

Yes, many in the community would prefer to live in local public schools with low crime rate, better schools. BUT because we choose to make sure that many of the these low income families live in North Tulsa Public School District because of low housing rates, they do not have the privilege to live in other areas of Tulsa, like Jenks, Broken Arrow, and Union District because of the high cost of living. I've lived in an area of Broken Arrow for 28 years that only has a few minorities live, it saddens me because many realtors and renters refuse to rent to minorities as much as possible. I know for a fact there are many homes with the Fair Housing Act but who are we to stop them.

yes, TPS is awful

Existe una marcada diferencia entre Union y Tulsa public schools

C. MINUTES FROM THE 2014 FAIR HOUSING FORUM

(Presentation)

Comment 1: Rob is that the threshold for predatory lending is 3 percent points above the treasury?

Rob Gaudin: Over the comparable treasury lending. I would say that is a threshold, it gives you a predatory style loan. That is really a small peek.

Comment 2: Is that like the 10-Year Treasury. What is that?

Rob Gaudin: I do not know.

Comment 3: That would give me an idea of what the rate is?

Rob Gaudin: It is whatever the rate was at the time of the loan was made.

(Presentation)

Comment 4: How would you distinguish between when someone is doing underwriting and there are just looking at someone's credit profile? They are looking at someone's file in making the distinction between someone's credit profile and a rate tier based on someone's credit score verses someone who is just discriminating against based on some discrimination. They either inflate the rate or change the terms of the loan based on some racial profiling or ethnic profile verses someone who has bad credit. So they are pushed up 3 percentage points based on tier credit score during underwriting when the bank is looking at someone's file and determines that they will make the loan, but they fall into another tier in their lending. I know when I apply for a loan; you get a rate based upon certain tiers when you achieve a certain credit score that that changes it around. So is there any way to know. Say that someone applies for a loan based on their credit score it is in those 3 percentage points. How do you know that that is just not a function of the underwriting process verses racial discrimination or ethnic discrimination?

Rob Gaudin: That is speculating. We do know the geographic area happen to correspond with high levels of predatory loans and high levels of denial in lower-income neighborhoods, which also where areas where blacks and Hispanics are.

(Presentation)

Comment 5: How did you validate your comment in the previous slide?

Rob Gaudin: This was drawn from the survey and people made the comment enough so that I drew from that for red lining and steering to occur. So there is no. This is the qualitative nature of it. I don't know for a fact that it does really exist, but enough people said it did and we are relating that information to you. On that I would be happy to answer any questions now. Maybe one of the other folks could come up and chat a little bit.

Comment 6: Would we be able to get a copy of these slides?

Rob Gaudin: I believe so, yes.

Comment 7: We can email the presentation to anybody who would like it. Just make sure that we have your contact information and acknowledge on the sign in sheet that you would like a copy of the presentation sent to you. No problem.

Comment 8: Is there any more information that you can get from banks that validate and show how that geographic issue in the willingness to not lend in certain areas that would help to validate the redlining point?

Rob Gaudin: I don't have the geographic maps, but what we can see is where denials occur. Sometimes people who want to buy go back and back and finally get a predatory loan. I was in Mississippi one time making this presentation and this woman, she was probably in her 50s, said I know that I have a predatory loan, because I was denied, but I got one. Now I am trying to pay it out. So, you can tell where they are.

Comment 9: Oklahoma has the third highest in foreclosure rates and sometimes it is just extremely high.

Comment 10: In Tulsa, they are coming down on foreclosures.

Comment 11: And subprime. We are not third. We were. When foreclosures first started Tulsa was third, five, fourteen, and twelve. It kept going up and down and up and down.

Comment 12: It was on Realty Tract. There was some HUD report that talked about how it was a fluctuating scale several times every month the rate could change. Every week it could change. At one point in time Tulsa had so many foreclosures it was ridiculous. The Urban League was like at one point the only foreclosure agency. They had so many foreclosures that they were seeing and I think even now they see at least 30 or 40 people a week just for foreclosure. So, foreclosures are going to continue, because the economy hasn't leveled off. People are still looking for jobs and you can see that the poverty rate is getting worse. It is going up and down and I don't think Tulsa is alone. The City of Tulsa is third in the country. A matter of fact is I even have a report the Homebuyer Education Association do on subprime and foreclosures. I will send that to you too.

Rob Gaudin: Thank you.

Comment 13: I have a question about not just the correlation between race and ethnicity and predatory, how is the correlation to low-income neighborhoods?

Rob Gaudin: The answer is yes.

Comment 14: I can see where in many cases lower income people don't have as high a credit score, they don't have the same type of access to credit. So they have more debt issues, because they are lower income. I was just curious.

Comment 15: Last to be hired, first to be fired.

Comment 16: What can be done?

Comment 17: I think that is where we would like to have some perspective from some other agencies and get some ideas about what we can do about that. I have some questions about that. I think one of the, because we talked about that this is a part of the Consolidated Plan. We have had public meetings, we have had three public meetings and one of the things that came

out in the public meetings were some of the things that Rob's findings have pointed out. The lack of public transit was identified in our public meetings. We all know that the transit system needs improvement. We still know that there is a lack of affordable housing at least identified in our meetings from the Consolidate Plan. People still feel that there is a need for affordable housing in the community as well as rehabbing our existing housing stock and so I guess the question is as to what can we do about some of these things? I know that our public housing is concentrated in low to moderate income Census tracts across the city. We have seen that and Rob has seen that in his data. We know that land use and zoning affects some of that and NIMBYism affects some of that. I guess my questions are what can the City do? We have undertaken zoning code update and are in the process of it.

Comment 18: I would like to add a couple of things to that. Yes, the City first of all did a Comprehensive Plan in 2010 and one of the remarkable things was that citywide it was recognized that North Tulsa was very; we had concentrated our resources in general. Our resources in jobs and made some changes. We have just completed in fact a smaller (Inaudible) so it is a recognized need. One of the things that came out of that planning was a plan that we need to update the zoning code to permit a larger variety of style of housing to be built. We are working on planning and that is another issue to lenders and builders. What they thought there was a market for we are trying to allow for smaller lots for housing, more townhouses, more mixed-use development. So we have a greater opportunity to provide an inventory on the public sector. So on the private sector side, so we trying to do that and we are in the process of updating the zoning. Another issue in terms of transit, you all know how bad our transit system is. One of the things that has come out of the recent funding measure is the City of Tulsa provided funding for a bus transit system and they looked at that particular opportunity. It is focusing on Peoria. From Peoria down to like 81st and South and one of the key things about Peoria and the thing about Tulsa itself, is that Peoria connects the community physically, socially and they are why we have that opportunity to build community. Planning is about building community, it is not just stuff. It is building community. We are working right now on the bus route and transit route. It will take a while to fund it, but one of the nice things about that corridor is we looked at how many people and how far was it to walk to jobs? That was the key location of Peoria. We had a heavy concentration to walkability to jobs. It also has a heavy concentration of walkability for people who do not have a car. That is not just North Tulsa, but a certain part of East Tulsa we did a plan. The students out there as well as the seniors say we need transit. We can't get to jobs, we can't get to places. That is another issue. The city is funding that. It is not a quick solution. Nothing is, but it is a change in the terms of zoning for the new categories. Transit and looking at that this and focuses on that. In terms of the small level, there is a discussion right now about the package of funds for housing downtown neighborhood market area. Downtown Tulsa is in renewal, this is west, north, northeast, not so much south where we have stronger housing. When we fund that we talk about in advance about concentrations of affordable or worker houses as I like to call it. The concentrations we are looking at is trying to look at least a strategy. Nothing has been decided, but if you are going to get funded from this pool, one of the things that we are looking at is rather than concentrate, 100 percent is going to be affordable housing, we would like to mix income throughout so people can't distinguish by this is affordable/worker aid housing or this. We want a certain percentage of people from every group to get folks together and are used to working together and you can't tell the difference unless you are looking at their car, if they have one or whatever. We want to do that. That is the policy that is being discussed to increase eligibility of these housing. One of the things about the zoning that we talked about and

looked at inclusionary zoning consideration and certain items nationwide about communities that have tried to establish inclusionary zoning that was successful (Inaudible).

Comment 19: What is the definition of inclusionary zoning?

Comment 20: Inclusionary zoning is where you get additional amount of worker rated for only housing in a certain area and by that has been successful in terms of the blight. It has been real successful. If you have old family houses that aren't being used, if you do inclusionary zoning a certain percentage of your homes will be rental housing, you get a higher percentage. You have to design your property differently and you have to market your property differently, but that is not necessarily bad.

Comment 21: Have we talked about density bonus?

Comment 22: That is what it involves. That is exactly right.

Comment 23: So it is not the inclusion of people of that income though?

Comment 24: Yeah, but the density bonus comes from the fact that you include affordable housing, but is renter occupied. The problem is that we found is how you do monitor this complex. That is the big issue, but our consultants looked at it. He said the same thing I said, why don't we research it.

Comment 25: Does that mean considering the new zoning code, density problems.

Comment 26: It has not been included in the new zoning codes looked at by the consultant. We did a study before the study that took place. I would be interested if there are other cities or communities where that particular zoning strategy didn't work out. All of a sudden, things in terms of the planning department looked at and trying to initiate.

Comment 27: I would just like to mention that street corridor has been granted the Phoenix District, which means the community now not only wanted the area to return to its formal glory, but to get better and better with each passing year.

Comment 28: Absolutely.

Comment 29: That is why the communities now want to be known as the Phoenix District.

Comment 30: That area and I have been in Tulsa since 77 and I used to work at (Inaudible) and I used to drive through and that area still has wonderful large pieces of underdeveloped property that had services. That image and that concept and that perception of that part of the community is crucial. East Tulsa was at a terrible decline, back in 2000,03,04,05 and part of it was that fact that they were stuffing people into housing out there. There was a lot of folks coming in from Latin communities, Mexico and Colombia and they were workers and they were working hard. It was a real problem. The community got together and had some good representation by their neighborhood associations, but they made a difference. Bringing districts to downtown. People working together and say I believe we can do something. They established an economic area. Look at the new development and the redevelopment and things that are taking place and part of that is because the city invested and said we really want to improve. (Inaudible) Wallace Engineers invested. People started to invest and realize that this is what we want to do. I think the opportunity to design some of Tulsa takes a community, property owners doing it. That is my observation.

Comment 31: What I would appreciate is if everyone would google the 36th Street North Small Area Plan and see what it is that we are looking for and there is some recruitment, there are some business, whatever we need out there. What we need to understand is this. Is that if one part of Tulsa hurts all of Tulsa hurts and we want Tulsa to reach its fullest potential and we want the business district to not just be an area where people come within the city, but from other parts in the city. The community wants to have ownership of that. For example if you have a building, the community wants to put in money and say hey do you see that poster or that picture? That is my building. I did that and somebody come on and see what I did. That way you can get more people wanting to invest in the area and it is from all over. We need to focus on the development, on the idea, the concept of one Tulsa. We must make the Phoenix District work. I am here of the Phoenix District asking for your help. Thank you. I am with the North Star Community Council. As a matter of fact it was the president of the neighborhood association that acquired help to acquire the funding for the project. She got upset when she found out that the mayor's plan had money for other parts of Tulsa and nothing for us. So she went down and made a plan.

Comment 32: I would like to add to that. The Phoenix area is vital. You can establish a concentrated area of success, by involving all of downtown. You can do the same in (Inaudible) you can do the same in communities and the property owners establish successful (Inaudible) and city helped them to fund key projects. When you get that kind of services you are going to grow. A small area like that is really a tremendous opportunity. You scatter your solutions of success around are just not seen very well.

Comment 33: Is Crossover Community working with Phoenix?

Comment 34: Yes, as a matter of fact they are the first business that we have had key members that have enlarged our community development council have acted as a focus group for the clinic that will be opening up soon. We are very excited about Crossover wanting to do it.

Comment 35: The clinic is open.

Comment 36: Is it open?

Comment 37: Just recently.

(Inaudible)

Comment 38: Nathan has worked to get and to pull some other members of the housing world, sphere. Nathan Harvill from the Human Rights Department will introduce these other folks here so you can have the opportunity to talk to them and maybe we can ask them some questions.

Nathan Harvill: I am Nathan Harvill of the Human Rights Department of the City of Tulsa. We are the local, the city department that hears fair housing issues and receives fair housing complaints. I will just do a quick overview here for us. We have a little bit, some challenges here as well. We do have an ordinance that is local that is fair housing related, but we also need to have it updated badly. We are in dire need of having an update with that. That is something that we have been working on here. The City has established a fair housing committee and we actually have some members here. Mr. Paul Kent is our chair, Mr. Malcolm Rosser, Mr. Steve Carr, is a committee member and Carmen is also on the committee. One of the things that we want to do here is try to push the City forward into some policies, some fair

housing policy that is going to make sense. It is going to be 21st century orientated and it is going to be useable and we can enforce these laws on the local level here, because as it stands right now if we wanted to enforce fair housing laws we have to go through HUD FHEO and they are based in Shreveport, Louisiana. People in Shreveport, Louisiana are probably fine people, but they do not know Tulsa, Oklahoma. We would rather keep that local here, so we can establish a community of inclusion and a community that offers fair housing opportunities to every person that qualifies. So that we can come together in a better way for fair housing. With that in mind and now that I have given my overview, here is Mr. Chris Thrutchley from the Oklahoma Attorney General's Office of Civil Rights and I also have Ms. Teresa Webster who is with Legal Aid Services of Oklahoma. Teresa is a chair of the Tulsa area Fair Housing Partnership Group and that is an organization of housing providers and fair housing advocates that get together and put on educational programs to make the public aware of fair housing and the fair housing laws. Chris's office is more of the enforcement of fair housing laws within the state level. I have asked both of them to come today to answer any questions in regard to enforcement of fair housing, the process there and any questions that you all might have so that we can get a dialog in. If there is anything that you may not know about fair housing where to go and get help. We have that information made available to you. I will let Teresa and Chris say a few words about to organization and of course you know Rob too.

Teresa Webster: Hello, I am with Legal Aid Services of Oklahoma as Nathan said I am the Fair Housing Project Director. We are subgrantees of another fair housing organization. We have had the grant since 2013 and so just under a year, in that time we have provided community education in Tulsa and also throughout the state of Oklahoma. We are also working with the enforcement agencies, which would be HUD and also with the office of Civil Rights Enforcement Agency office. It was an office to help people to enforce their rights. So basically in addition to providing education, which I think is hugely important and very much needed throughout the state of Oklahoma. We are helping people to do something with the information that they have. It could be filing a complaint with HUD or filing one with the office of Civil Rights Enforcement. It could be actually helping them to file a lawsuit. We want people to take their fair housing rights seriously and that is why we are helping them to learn and enforce.

Chris Thrutchley: I am excited to be here. I am Chris Thrutchley with the Attorney General's Office of Civil Rights Enforcement. Just briefly recently the Oklahoma Legislature eliminated the Oklahoma Human Rights Commission and they reassigned that function to the Attorney General's Office. The hope was that there might be a bit more enforcement. I was recently hired to run that office as a reflect of Scott Pruitt's passion on civil rights, he wanted to headquarter our office here in Tulsa in recognition of some of the historic civil rights issues that we face. I am excited to be here to represent to Attorney General's Office. We are currently building our office. We enforce Oklahoma's antidiscrimination laws which include not only discrimination in housing, but discrimination in employment, discrimination in public accommodation. I would say you don't have to go the Shreveport Louisiana, though you can. You can go to the Oklahoma Attorney General's website. It is at ok.gov/oag if you go to the civil rights page you can actually go to the housing discrimination section of our website and you can pull a discrimination complaint form there and fill it out on line. You can send it to us at our Tulsa office or you can send it to our Oklahoma City office. If you have concerns about redlining or lending, you can file a complaint with us. That doesn't initiate a lawsuit, but what that does is it initiates an investigation. It authorizes us to begin to investigate and pull the kind of data that the gentleman in the back was asking about. If somebody feels like there is a lender

that is discriminating or that there is a redlining problem or some other form of discrimination, you file a complaint with our office and we begin the type of investigation that is necessary to gather the information to know whether there is circumstantial or a direct issue of discrimination. So we are excited to be here. We are excited to help wherever we can. We would love to participate on some of these committees as we get more integrated into what's happening in the housing circles and we look forward to getting to know what is happening on the street.

Comment 39: Can I just interrupt. I just want to make a point because this forum is not really reflective of the people that need to hear about fair housing. Most of the people in this room are people who are actively involved in educating or advocating or addressing or enforcing fair housing. Just so that you know that. The people that really should be in this room, like my sister here, if this was later in the day. There would be people here who could tell you what their own experiences are. So the AG office could really get a real reflection, because of the report I have there were 76 complaints in 2013, fair housing. As of today there were like 42 fair housing complaints. Legal Aid just had some that are almost all of them are being file. The other problem with fair housing education in the city is that those that have the power to educate and bring people together do not do it at a time that is really convenient for the public itself. Even Fair Housing Partnership, many of the trainings that we do are for people in the industry. There don't know and that is why those answers to those questions were such vague. They don't know anything and they really don't care. They just want to make that money. That is why redlining is such a significant thing in this city alone. We are going to continue to see those grayed out, greened out, purpled out areas on maps until we get a better handle on how to educate. That is what I would really like to do. The education and find a way for us to educate people more effectively. They use social media, they use telephones, and they use technology. We have to find a better way. We don't want what happened in New York to happen here, but it could. There is a great possibility, because people don't address the issues that really need to be addressed. The 16 Impediments from last time, we still haven't addressed them.

Comment 40: What is your name.

Comment 41: Carmen on Fair Housing Partnership.

Comment 42: What our top priority is education. One of the things that the general did was we launched an outreach in July of this last year in celebration of the 50th anniversary of the Civil Rights Act of 1964. Because of social media we did to try to make that accessible to everybody across the state, we live streamed that entire event on the internet and all of the sections that were part of that event were carved and segments and loaded on our website. If you go to our website you can watch those training session anytime. Before work. After work. Whenever. We want to continue to do that and build a wide menu of training and educational material that are at our website. So one of the things that we would like to do is collaborate with others in the community to get help in putting on those educational events like you are talking about. We would love to partner with you in doing that. I will tell you this too, if you look at the Antidiscrimination Act it is not just individuals that can file a complaint. Organizations can file complaints as well. So if your organization serves constituencies and you want to file a complaint on behalf of those you know who have experienced problems. You can do that as well.

Comment 43: I will say that in our meeting today that was one of the things that we addressed, Carmen about the timing, the locations, just having sensitivity to the community and the people we want to reach. It is wonderful to have an event. It is even better to have people show up. So we need to know to be sensitive to people's schedules and that is what we are talking about in going forward. Legal Aid and other agencies that are a part of the partnership. We are strategically planning to make sure that we are sensitive to those in the community so that we can provide education to them. Not just looking at providing information, but well-rounded education that reaches not just the adults, but also kids. It needs to start young.

Comment 44: I will tell you we have answers as it comes to the kids. When you teach a kid something. (Inaudible) we have done Fair Housing Five and as a kid we have done a lot of that education.

Comment 45: We know a lot of people that are interested and they will get interested if you reach out to their children as well. We are looking bat ways to reach the community and not just a certain group.

Comment 46: I will say that we did schedule it at this time because we had a RFP session for CDBG before this. So a lot of the same people that applied for the CDBG are the same agencies of the people that they serve. We thought that would be a good time so that we would have a captive group of people that are already in this building for another purpose so that they could then stay here and a few of those folks did stay over. There are also people that do shift work that works in the evenings and at lot of the low-income individuals in the community do not work 9 to 5. They work shift work or they work at night so that was another reason. Primarily we had that RFP session earlier today until 3 o'clock. Last year we did schedule it at 5 pm and we had one person show up. So we wanted to take a different approach and open it up to a different group of people who may not be working 8 to 4 and maybe doing shift work and would be available during that time.

Comment 47: I think that another thing that we are doing along the enforcement line, another thing that Legal Aid is doing is we are training attorneys for the purpose of helping us. Obviously we can't do it all ourselves, but we are recruiting attorneys from the private sector who will help us to enforce.

Comment 48: Some of us don't know what you are talking about with fair housing in Eastside of the City of Tulsa.

Comment 49: Right, we are talking about Legal Aid as a fair housing.

Comment 50: I wasn't talking about you. I was just trying to explain to Carmen about why we scheduled it like we did today. That is why.

Comment 51: That is one of the things that we are doing in addition. We do want to and one part is to give people education and to tell them yes you have this right and you can enforce it if you are being discriminated against, but then who do you go to? Who is going to help you?

Comment 52: I would just like the, who you go to make a point of clarification. Any HUD, any fair housing complaint that goes to HUD, in Texas, Oklahoma, Louisiana, goes to Fort Worth. We don't even have an office in Shreveport Louisiana, sorry.

Comment 53: Where is Bernadette.

Comment 54: Bernadette is the supervisor.

Comment 55: She is based in...

Comment 56: She is based in New Orleans, but they are all going to go to Fort Worth, which is out regional office for this part of the state. So if you go to anybody, they will come to me and Sharon and we will write on their behalf.

Comment 57: Right, but the people who do the investigation typically are dispatched from where from HUD?

Comment 58: Oklahoma, Texas, Arkansas...

Comment 59: All those different places.

Comment 60: I don't think that we ever send anybody from New Mexico.

Comment 61: That's probably a good idea.

Comment 62: To the Attorney General's Office (Inaudible) in my inspection, we began to notice in terms of development many chemical plants and things of these sorts and in my readings and preliminary investigations. I found out that particularly in Tulsa, after the race riots a lot of land particularly in North Tulsa was leased out to industrial to keep you from building density in the community (Inaudible). My question is have there ever and are you aware are there any civil rights lawsuits filed with a zoning issue?

Comment 63: No sir. I am not, but I would say as you spot those issues, if you want to pursue a complaint through the proper channels and as someone who would have standing in those communities, maybe it is a homeowner nearby or a community organization like Ms. Chandler represents who has a vested interest in that area. Maybe it is a number of groups. File a complaint then what we can do is we can begin to look at whether or not there is a civil rights related issue connected with zoning issues. I am sure that the city might be interested in collaborating with that too.

Comment 64: Seems to me that you guys have already looked at it and considered.

Comment 65: We have to put it all out there. You think about it for a long time and are constantly seeking. (Inaudible)

Comment 66: Our policy is that our preference first and foremost is to do everything that we can that would be proactive, creative, positive in collaborating with strategic partners throughout the state or throughout a community to come up with solutions that are great for everybody. Like you are talking about with Phoenix or a cross over community that you have or the city the gentleman is back here talking about, but to be sure we will take action with when the circumstances warrant. Some kind of enforcement action, but for our purposes some kind of a complaint would trigger an actual investigation. It could help facilitate positive movement.

Comment 67: I could say it is such a subtle thing that most folks who are educated, so they don't know. We just complained about a meeting and maybe when a new one pops up. I am just trying and people won't be aware of everything, but I wanted to ask the City in particular. The City is taking a leave at looking at that.

Comment 68: One of the things and this again is my personal observation. One of the things that I think is crucial is getting the zoning established, particularly along the old transportation routes, the redlining, and so forth. The change in industry has left all of those sites vacant. Those sites are opportunity sites. The thing that I see is that at a state level there are policy decisions about how to build certain facilities to enhance transportation. For example interchanges are an example. We don't build interchanges in Oklahoma State. We don't have interchanges. That is our policy. The policy can change. It is an engineering solution and there are some locations in the near Tulsa area if we got a policy change it would give an impact assessment of what would happen if we did an improvement. It is a state decision. Don't look at what the demand is now; look at what the demand will be later. What does the plan show for that area, but could take place. That is an argument since I have been with the city and talked to the state. Don't use the numbers now (Inaudible) we are not going to go there, because there is no demand. Somebody would build something and the politics come in and do the express lane. The same thing happens with the express lane. At the state level if we could say we are not talking about them, we are talking about Phoenix; we are talking about what can be. This lane will congregate this and we need you to change a certain location or we need you to do a transit at this location. (Inaudible) So the final things through the state legislature the entities that provide public improvements. Look at this differently so we can say that we get this improvement, (Inaudible) the numbers will be there is you do the interchange. Sort is funny things like that. I don't think that there is any intent, but it is thinking old style. Not creatively. If we do this look what is going to happen. I will give you an example saying 1st and US 75 over Tulsa Hills, they built it and said that you could do an interchange. No we can't do that. Now they are saying, oh we have to do an interchange there. It is after the fact. Other states do road improvements ahead of time to facilitate that problem, but for some reason in the State of Oklahoma. In Texas it is amazing in Dallas/Fort Worth. I remember from the Dallas/Fort Worth area about 25 miles south it is crazy. It is exploding. We need to catch up at least in our inter loop in downtown Tulsa. If you want it to grow then build us an infrastructure and a lot of folks will respond to that. That is the reason the change is so...

Comment 69: I wonder how long it would be before the private sector. That is a one of the things about Crossover Church. They have three of them. The distribution of wealth, the location, and reallocation. So there has to be a church and move back into your community where your church is. Spend your money in your own community where your church is, live there. So as opposed to not having we are going to North Tulsa and that might have slowed down and we are going to have to take a different avenue and we are going to have to do something. It should be the private sector that jumps in.

Comment 70: If we can get the people behind the effort. The crossover is wonderful and what you have to do is you got to go out and do and the faith based community brought about a few things. The faith based community is a part of private sector people. Use that clout as part of a of a voter and private sector entity. Work as a citizen and state lobbying those about public improvements and to make it more attractive to other folks too in fact.

Comment 71: Is this conversation going in the Business Journal? We need to be sure to say the right things.

Comment 72: I just want to throw something out and I don't know if this is the place to throw it out, but I am going to do it anyway. One of the things that we want in the Phoenix District is a grocery store. We need other businesses. I have called and been up twice, because there is

an excellent spot. Parking is great and there is excellent space, but I cannot get whoever is in charge to get them to give me a call. So if anybody has any sway with those people, please get on it. I want to share this with you. There was one individual who wanted to have an office there and first thing they said was can you afford this and he says that I am paying three times what you are asking someplace else and they gave him a whole rigmarole. So he felt like, I don't have to beg anybody to take my money so he want someplace else. So there seems to be neighbor to neighbor, but it doesn't seem very neighborly. So if you notice, please have them talk. It is vacant and they are trying to get business there, but I see that as an impediment.

Comment 73: Who do you say owns that?

Comment 74: I don't know the owner. I don't know who the individual of the property.

Comment 75: The problem is given to that. They didn't buy it.

Comment 76: Rob, some of the other things that were listed on your list of potential findings or impediments if you will, like NIMBYism and some of those kinds of things. So, some of those kinds of issues that you have identified as issues or potential issues, what if anything can you do about NIMBYism?

Rob Gaudin: If in the case of NIMBYism.

Comment 77: What is it?

Comment 78: Not in my back yard. So, if you had for instance a zoning case where there was rezoning be considered for multi-family housing property adjacent to a neighborhood and the neighborhood folks came out and said that we don't want that in our backyard. That is where that NIMBY comes from.

Comment 79: That is getting worse all of the time. Just now there was a zoning case and a lot of people said we don't want it there. It was a perfect location. It just all over the metropolitan area.

Rob Gaudin: That is what people did say in the survey that it is around.

Comment 80: It has been around for a long time. All multifamily housing or just...

Comment 81: It is with all.

Comment 82: Who primarily objects, the homeowner associations?

Comment 83: We typically see that at the planning commission. I think you can go to any city planning commission anywhere. You just pick one and if there is a zoning case you are likely going to have property owners who are going to say that I don't want that next to my house. I think that happens every month at plenty of commissions across and not just Tulsa, but other planning commissions and zoning board's cases being heard. I think that is a normal part of the process, but what we are getting at if that is an issue. I think that is an issue in every community. I think there are folks who are going to come out and say I don't want that apartment complex next to my house. I don't want my backyard backing up to it. My kids are not going to be safe. You get this whole litany of stuff that people are upset about to combat. Especially if you put the word affordable. They immediately attach a stigma to it and say I don't want that. You can put it somewhere else, but don't put it in mine. I don't want my kids around

that. So my question is how is a community to go about trying to change that. If that is something that shows up in our Analysis of Impediments, what can we do or is there anything we can do other than trying to educate people that it is not.

Rob Gaudin: Part of today's meeting is to see input about it. Can we do it rather than pose the question what can we do. I am looking for good ideas. Some of the ideas...

Comment 84: Can you put that list back? Can you put that slide back?

Rob Gaudin: So these are kinds of things that we happen to see.

Comment 85: We know that there are large concentrations of assisted housing and you can see it on the map. We see the data and everybody knows that there are pockets and that housing is concentrated in certain pockets around the city. I know that NIMBYism is an issue and I think that is why, particularly why these multifamily units have ended up in certain pockets was that the zoning at the time and maybe not the zoning now, allowed those multi-family development and in conjunction with people saying that I don't want these multi-family around my house. It forced these multi-family housing complexes into certain areas that had the permissive zoning because nobody else wanted them near them. That is what I think overtime is how we ended up with the situations as it is today, because the zoning allowed it and when someone asked or wanted to do it in other parts of town, then they were prohibited from building that there. So, that is why you ended up with these isolated high concentrations of multi-family and some of it is subsidized and particularly you can look right at the map and see where these high concentrations are.

Comment 86: Just a comment on what you are saying. I facilitated the table discussion with planning Tulsa and with the councilman. My question was do we want any more housing complexes in Tulsa. No, No, No we have plenty of apartments. No more apartments. I could argue and I said where are some market rate apartments in North Tulsa? Then everybody and all except for one are low-income complexes. Do we need apartment complexes like we need rain. It builds density. Building density is how you get a supermarket. They did a study for the supermarket in this area and there are like three people in the household making \$19,000 or \$15,000 a year. Who is going to want to build a supermarket? I am not saying that we don't need one, but again rooftops and retail follows. I am not saying chicken and an egg, but this stuff can't all be done, because everybody else is waiting on everybody else to do something. It is nobody's job to really take one area and make it. We really need an economic development director for each area. It has to be somebody's job. I was talking to the Metro Chamber and he only works on jobs that provide a certain amount of income. We are only looking for jobs; we are not looking for working. What about that expressway? This is the Chamberman, I have been asking that myself. I only asked him to make the point that he doesn't know and he works for the Metro Chamber, but because it is nobodies job. If we concentrate on an area like North Tulsa, you can't look at one city council to do it all. They are saying at one meeting after the next that that is his job. We need one person to jump up and say that we are going to fix this area.

Comment 87: That has been my question. I emailed somebody from the Chamber that is supposed to deal with communication. I never received a response. My question is who is looking out for North Tulsa?

Comment 88: It is going to have to be us.

Comment 89: These areas that are successful, concentrated in a planned community and people really invested in their own area. There are all kinds of things that neighbors are talking about. These apartments initially were good apartments, after years they wear out, the investor they flip them and there are all kinds of things that are associated with that, but when you become a part of that community then you want to be there. The Tulsa Young Professionals, the Chamber, if you can get folks and young people working isn't he same area. You establish that paycheck and that area of success and combine that with the neighborhood. When I go to a restaurant, I don't go to a chain; I go to a local business. I do everything that I can, it cost more and I don't care. My daughter, with three kids and one income and they struggle, but they shop local. So it takes a kind of commitment and if you get that to this planning point of view. The issues of some of the multifamily folks (Inaudible). They see folks committed to that community, build them and it will pass. A grocery store and people will shop there. If it is to then it falls away and it is a bad spiral down. Phoenix is hot right now and that is a real key component is the community organization.

Comment 90: What we are working on is a community organization, community owned and operated and that is what we are working on right now.

D: ADDITIONAL TABLES

Table D.1
Cost Burden and Severe Cost Burden by Tenure

City of Tulsa
 2000 Census & 2012 Five-Year ACS Data

Data Source	Less Than 30%		31%-50%		Above 50%		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage									
2000 Census	43,197	76.8%	8,135	14.5%	4,596	8.2%	296	.5%	56,224
2012 Five-Year ACS	39,625	69.8%	10,244	18.1%	6,681	11.8%	189	0.3%	56,739
Owner Without a Mortgage									
2000 Census	25,626	90.0%	1,341	4.7%	1,002	3.5%	506	1.8%	28,475
2012 Five-Year ACS	27,102	86.2%	2,405	7.6%	1,626	5.2%	311	1.0%	31,444
Renter									
2000 Census	43,653	59.4%	13,801	18.8%	11,450	15.6%	4,638	6.3%	73,542
2012 Five-Year ACS	35,149	46.4%	18,165	24.0%	17,091	22.6%	5,326	7.0%	75,731
Total									
2000 Census	112,476	71.1%	23,277	14.7%	17,048	10.8%	5,440	3.4%	158,241
2012 Five-Year ACS	101,876	62.2%	30,814	18.8%	25,398	15.5%	5,826	3.6%	163,914

Table D.2
Fair Housing Complaints by Issue

City of Tulsa
2004–2014 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	Total
Discriminatory terms, conditions, privileges, or services and facilities	11	6	11	10	12	13	9	11	16	8	6	113
Discrimination in term, conditions or privileges relating to rental	12	14	6	7	4	1	4	1	2	1	3	55
Failure to make reasonable accommodation	7	7	6	3	5	2	5	3	9	2	5	54
Discriminatory acts under Section 818 (coercion, etc.)	5	5	1	3	1	1	7	5	5	1	4	38
Discriminatory refusal to rent	2	3	1	2	3	3	2	2	4	3	4	29
Discriminatory refusal to rent and negotiate for rental	4		1	3	5	7		5	2			27
Non-compliance with design and construction requirements (handicap)						1	4		1		1	7
Failure to permit reasonable modification	2	1	1							2	1	7
Discriminatory financing (includes real estate transactions)	1	1						1	1			4
Otherwise deny or make housing available			1	1						1	1	4
Other discriminatory acts	1			1			1	1				4
Discriminatory advertising, statements and notices		2									1	3
Discriminatory refusal to negotiate for rental				1					1			2
Discrimination in making of loans						1	1					2
Discrimination in the terms or conditions for making loans		1			1							2
Discrimination in terms, conditions, privileges relating to sale	1						1					2
Steering								1		1		2
Discriminatory refusal to sell and negotiate for sale							1					1
False denial or representation of availability				1								1
Discrimination in services and facilities relating to sale			1									1
Failure to provide an accessible route into and thru the covered unit		1										1
Total Issues	46	41	29	32	31	29	35	30	41	19	26	359
Total Complaints	31	22	18	18	19	17	21	19	18	9	10	202

Table D.3
Fair Housing Complaints Found With Cause by Issue

City of Tulsa
 2004–2014 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	Total
Discriminatory terms, conditions, privileges, or services and facilities	4	3	4	2	4	3	3	6	3	3		35
Failure to make reasonable accommodation	4	5	3	2	2	1	2	1	3		1	24
Discrimination in term, conditions or privileges relating to rental	4	6	2	2	3		1		1	1	1	21
Discriminatory refusal to rent and negotiate for rental	2		1		1			4				8
Discriminatory acts under Section 818 (coercion, etc.)	2	2		1				2	1			8
Discriminatory refusal to rent	1	2	1		1					1		6
Non-compliance with design and construction requirements (handicap)						1	1					2
Failure to permit reasonable modification	1									1		2
Discrimination in making of loans							1					1
Steering										1		1
Total Issues	18	18	11	7	11	5	8	13	8	7	2	108
Total Complaints	12	10	6	4	7	4	6	9	4	4	1	67

Table D.4
Outcome by Year
 City of Tulsa

City of Tulsa Human Rights Department 2004 - 2014

Outcome	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	Total
Dismissed, non-response from CP	1	1	.	4	2	4	3	15
No Probable Cause	.	2	3	2	2	2	2	13
Dismissed, pursued by HUD	5	5
Referred to HUD	3	.	.	1	.	4
Referred to Early Settlements	1	1	1	.	.	3
RP to meet accommodations	1	2	.	3
Bradford Creek Apts.	1	1	.	.	2
Referred to OK Human Rights Comm.	2	2
CP settled with management	1	1
Dismissed, referred to Fair Housing Council	1	1
No Probable Cause, no ADA violation	1	1
On-Going	1	1
Referred to Public Works Dept.	1	.	1
RP agreed to 16 days compensation	1	1
Settled for \$775.00 from RP	.	1	1
Missing	.	1	1
Total	5	4	.	.	1	4	10	8	7	10	6	55

E: ADDITIONAL HMDA TABLES

Table E.1
Owner-Occupied Home Purchase Loan Applications by Loan Type

City of Tulsa
 2008 - 2012 HMDA Data

Loan Type	2008	2009	2010	2011	2012	Total
Conventional	4,249	3,318	2,468	2,448	3,000	15,483
FHA - Insured	3,250	4,457	3,142	2,372	2,530	15,751
VA - Guaranteed	241	316	265	329	283	1,434
Rural Housing Service or Farm Service Agency	3	8	8	4	9	32
Total	7,743	8,099	5,883	5,153	5,822	32,700

DENIAL RATES

Table E.2
Loan Applications by Action Taken

City of Tulsa
 2008 - 2012 HMDA Data

Action	2008	2009	2010	2011	2012	Total
Loan Originated	4,159	4,329	3,231	2,755	3,183	17,657
Application Approved but not Accepted	275	216	186	206	177	1,060
Application Denied	648	552	514	467	498	2,679
Application Withdrawn by Applicant	441	498	391	262	351	1,943
File Closed for Incompleteness	80	101	53	81	46	361
Loan Purchased by the Institution	2,138	2,395	1,508	1,382	1,567	8,990
Preapproval Request Denied	2	8	0	0	0	10
Preapproval Approved but not Accepted	0	0	0	0	0	0
Total	7,743	8,099	5,883	5,153	5,822	32,700
Denial Rate	13.5%	11.3%	13.7%	14.5%	13.5%	13.2%

Table E.3
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant

City of Tulsa
 2008 - 2012 HMDA Data

Race		2008	2009	2010	2011	2012	Total
American Indian	Originated	158	209	158	156	198	879
	Denied	27	20	26	22	30	125
	Denial Rate	14.6%	14.1%	14.1%	12.4%	13.2%	12.5%
Asian	Originated	109	119	90	69	95	482
	Denied	21	25	16	11	15	88
	Denial Rate	16.2%	17.4%	15.1%	13.8%	13.6%	15.4%
Black	Originated	256	188	143	105	110	802
	Denied	76	62	53	55	44	290
	Denial Rate	22.9%	24.8%	27.0%	34.4%	28.6%	26.6%
White	Originated	3,367	3,489	2,639	2,251	2,638	14,384
	Denied	443	375	346	289	345	1,798
	Denial Rate	11.6%	9.7%	11.6%	11.4%	11.6%	11.1%
Not Available	Originated	261	319	197	166	140	1,083
	Denied	81	70	73	90	64	378
	Denial Rate	23.7%	18.0%	27.0%	35.2%	31.4%	25.9%
Not Applicable	Originated	8	5	4	8	2	27
	Denied	0	0	0	0	0	0
	Denial Rate	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Total	Originated	4,159	4,329	3,231	2,755	3,183	17,657
	Denied	648	552	514	467	498	2,679
	Denial Rate	13.5%	11.3%	13.7%	14.5%	13.5%	13.2%
Non-Hispanic	Originated	3,678	3,792	2,825	2,420	2,854	15,569
	Denied	489	416	379	330	356	1,970
	Denial Rate	11.7%	9.9%	11.8%	12.0%	11.1%	11.2%
Hispanic	Originated	211	234	199	167	190	1,001
	Denied	76	57	54	38	62	287
	Denial Rate	26.5%	19.6%	21.3%	18.5%	24.6%	22.3%

Table E.4
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant

City of Tulsa
 2008 - 2012 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	22	22	48	308	58	0	458	40
Employment History	1	4	9	68	11	0	93	8
Credit History	34	19	92	376	79	0	600	68
Collateral	7	5	16	159	29	0	216	22
Insufficient Cash	2	7	9	46	6	0	70	9
Unverifiable Information	4	2	7	55	16	0	84	14
Credit Application Incomplete	0	2	9	99	25	0	135	11
Mortgage Insurance Denied	0	0	1	8	1	0	10	2
Other	3	5	13	107	20	0	148	17
Missing	52	22	86	572	133	0	865	96
Total	125	88	290	1,798	378	0	2,679	287
% Missing	71.2%	33.3%	42.2%	46.7%	54.3%	0.0%	47.7%	33.4%

Table E.5
Loan Applications by Selected Action Taken by Gender of Applicant

City of Tulsa
2008 - 2012 HMDA Data

Gender		2008	2009	2010	2011	2012	Total
Male	Originated	2,693	2,793	2,059	1,767	2,077	11,389
	Denied	386	327	289	257	288	1,547
	Denial Rate	12.5%	10.5%	12.3%	12.7%	12.2%	12.0%
Female	Originated	1,366	1,427	1,081	909	1,033	5,816
	Denied	216	186	183	152	170	907
	Denial Rate	13.7%	11.5%	14.5%	14.3%	14.1%	13.5%
Not Available	Originated	90	104	87	71	71	423
	Denied	46	39	42	58	40	225
	Denial Rate	33.8%	27.3%	32.6%	45.0%	36.0%	34.7%
Not Applicable	Originated	10	5	4	8	2	29
	Denied	0	0	0	0	0	0
	Denial Rate	.0%	.0%	.0%	.0%	.0%	0.0
Total	Originated	4,159	4,329	3,231	2,755	3,183	17,657
	Denied	648	552	514	467	498	2,679
	Denial Rate	13.5%	11.3%	13.7%	14.5%	13.5%	13.2%

Table E.6
Loan Applications by Income of Applicant: Originated and Denied

City of Tulsa
2008 - 2012 HMDA Data

Income		2008	2009	2010	2011	2012	Total
\$15,000 or Below	Loan Originated	34	19	23	13	11	100
	Application Denied	19	22	29	28	21	119
	Denial Rate	35.8%	53.7%	55.8%	68.3%	65.6%	54.3%
\$15,001– \$30,000	Loan Originated	532	638	513	362	364	2,409
	Application Denied	141	136	147	112	124	660
	Denial Rate	21.0%	17.6%	22.3%	23.6%	25.4%	21.5%
\$30,001– \$45,000	Loan Originated	941	1,089	742	548	602	3,922
	Application Denied	164	143	135	131	113	686
	Denial Rate	14.8%	11.6%	15.4%	19.3%	15.8%	14.9%
\$45,001– \$60,000	Loan Originated	669	692	477	448	429	2,715
	Application Denied	118	79	64	63	66	390
	Denial Rate	15.0%	10.2%	11.8%	12.3%	13.3%	12.6%
\$60,001– \$75,000	Loan Originated	467	459	331	288	391	1,936
	Application Denied	56	45	32	31	45	209
	Denial Rate	10.7%	8.9%	8.8%	9.7%	10.3%	9.7%
Above \$75,000	Loan Originated	1,429	1,352	1,105	1,070	1,335	6,291
	Application Denied	138	116	94	97	117	562
	Denial Rate	8.8%	7.9%	7.8%	8.3%	8.1%	8.2%
Data Missing	Loan Originated	87	80	40	26	51	284
	Application Denied	12	11	13	5	12	53
	Denial Rate	12.1%	12.1%	24.5%	16.1%	19.0%	15.7%
Total	Loan Originated	4,159	4,329	3,231	2,755	3,183	17,657
	Application Denied	648	552	514	467	498	2,679
	Denial Rate	13.5%	11.3%	13.7%	14.5%	13.5%	13.2%

Table E.7
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied

City of Tulsa
 2008 - 2012 HMDA Data

Race		<= \$15K	\$15K-\$30K	\$30K-\$45K	\$45K-\$60K	\$60K-\$75K	> \$75K	Data Missing	Total
American Indian	Loan Originated	1	122	250	141	125	230	10	879
	Application Denied	6	32	38	16	13	19	1	125
	Denial Rate	85.7%	20.8%	13.2%	10.2%	9.4%	7.6%	9.1%	12.5%
Asian	Loan Originated	2	88	100	73	58	158	3	482
	Application Denied	1	27	24	10	7	19	0	88
	Denial Rate	33.3%	23.5%	19.4%	12.0%	10.8%	10.7%	0.0%	15.4%
Black	Loan Originated	11	218	247	139	70	106	11	802
	Application Denied	12	95	90	35	22	31	5	290
	Denial Rate	52.2%	30.4%	26.7%	20.1%	23.9%	22.6%	31.3%	26.6%
White	Loan Originated	83	1855	3107	2198	1569	5353	219	14384
	Application Denied	84	410	437	278	141	416	32	1798
	Denial Rate	50.3%	18.1%	12.3%	11.2%	8.2%	7.2%	12.7%	11.1%
Not Available	Loan Originated	3	126	218	164	114	438	20	1083
	Application Denied	16	96	97	51	26	77	15	378
	Denial Rate	84.2%	43.2%	30.8%	23.7%	18.6%	15.0%	42.9%	25.9%
Not Applicable	Loan Originated	0	0	0	0	0	6	21	27
	Application Denied	0	0	0	0	0	0	0	0
	Denial Rate	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Total	Loan Originated	100	2,409	3,922	2,715	1,936	6,291	284	17,657
	Application Denied	119	660	686	390	209	562	53	2,679
	Denial Rate	54.3%	21.5%	14.9%	12.6%	9.7%	8.2%	15.7%	13.2%
Non-Hispanic	Loan Originated	84	1,947	3,392	2,415	1,754	5,737	240	15,569
	Application Denied	77	454	479	290	173	464	33	1,970
	Denial Rate	47.8%	18.9%	12.4%	10.7%	9.0%	7.5%	12.1%	11.2%
Hispanic	Loan Originated	14	345	312	138	69	117	6	1,001
	Application Denied	20	98	96	44	10	12	7	287
	Denial Rate	58.8%	22.1%	23.5%	24.2%	12.7%	9.3%	53.8%	22.3%

PREDATORY LENDING

Table E.8
Loans by Loan Purpose by HAL Status

City of Tulsa
 2008 - 2012 HMDA Data

Loan Purpose		2008	2009	2010	2011	2012	Total
Home Purchase	Other	3,758	4,084	3,182	2,709	3,134	16,867
	HAL	401	245	49	46	49	790
	Percent HAL	9.6%	5.7%	1.5%	1.7%	1.5%	4.5%
Home Improvement	Other	708	673	565	480	595	3,021
	HAL	142	111	21	29	28	331
	Percent HAL	16.7%	14.2%	3.6%	5.7%	4.5%	9.9%
Refinancing	Other	2,168	5,393	4,575	3,753	5,132	21,021
	HAL	514	316	54	55	60	999
	Percent HAL	19.2%	5.5%	1.2%	1.4%	1.2%	4.5%
Total	Other	6,634	10,150	8,322	6,942	8,861	40,909
	HAL	401	245	49	46	49	790
	Percent HAL	13.7%	6.2%	1.5%	1.8%	1.5%	1.6%

Table E.9
Loans by HAL Status by Race/Ethnicity of Borrower

City of Tulsa
 2008 - 2012 HMDA Data

Race	Loan Type	2008	2009	2010	2011	2012	Total
American Indian	Other	145	204	158	156	196	859
	HAL	13	5	0	0	2	20
	Percent HAL	8.2%	2.4%	.0%	.0%	1.0%	2.3%
Asian	Other	99	110	89	67	92	457
	HAL	10	9	1	2	3	25
	Percent HAL	9.2%	7.6%	1.1%	2.9%	3.2%	5.2%
Black	Other	214	177	140	101	109	741
	HAL	42	11	3	4	1	61
	Percent HAL	16.4%	5.9%	2.1%	3.8%	.9%	7.6%
White	Other	3,060	3,280	2,605	2,215	2,597	13,757
	HAL	307	209	34	36	41	627
	Percent HAL	9.1%	6.0%	1.3%	1.6%	1.6%	4.4%
Not Available	Other	236	310	186	162	138	1,032
	HAL	25	9	11	4	2	51
	Percent HAL	9.6%	2.8%	5.6%	2.4%	2.9%	4.7%
Not Applicable	Other	4	3	4	8	2	21
	HAL	4	2	0	0	0	6
	Percent HAL	50.0%	40.0%	.0%	.0%	.0%	22.2%
Total	Other	3,758	4,084	3,182	2,709	3,134	16,867
	HAL	401	245	49	46	49	790
	Percent HAL	9.6%	5.7%	1.5%	1.7%	1.5%	4.5%
Non-Hispanic	Other	3,335	3,579	2,793	2,382	2,813	14,902
	HAL	343	213	32	38	41	667
	Percent HAL	9.3%	5.6%	1.1%	1.6%	1.4%	4.3%
Hispanic	Other	181	215	194	164	185	939
	HAL	30	19	5	3	5	62
	Percent HAL	14.2%	8.1%	2.5%	1.8%	2.6%	6.2%

Table E.10
Loans by HAL Status by Income of Borrower

City of Tulsa
 2008 - 2012 HMDA Data

Income		2008	2009	2010	2011	2012	Total
\$15,000 or Below	Other	30	16	22	12	11	91
	HAL	4	3	1	1	0	9
	Percent HAL	11.8%	15.8%	4.3%	7.7%	.0%	9.0%
\$15,001–\$30,000	Other	439	600	505	356	359	2,259
	HAL	93	38	8	6	5	150
	Percent HAL	17.5%	6.0%	1.6%	1.7%	1.4%	6.2%
\$30,001–\$45,000	Other	835	1,035	731	542	589	3,732
	HAL	106	54	11	6	13	190
	Percent HAL	11.3%	5.0%	1.5%	1.1%	2.2%	4.8%
\$45,001–\$60,000	Other	613	659	471	442	426	2,611
	HAL	56	33	6	6	3	104
	Percent HAL	8.4%	4.8%	1.3%	1.3%	.7%	3.8%
\$60,001–\$75,000	Other	437	441	328	278	385	1,869
	HAL	30	18	3	10	6	67
	Percent HAL	6.4%	3.9%	0.9%	3.5%	1.5%	3.5%
Above \$75,000	Other	1,323	1,255	1,085	1,053	1,313	6,029
	HAL	106	97	20	17	22	262
	Percent HAL	7.4%	7.2%	1.8%	1.6%	1.6%	4.2%
Data Missing	Other	81	78	40	26	51	276
	HAL	6	2	0	0	0	8
	Percent HAL	6.9%	2.5%	.0%	.0%	.0%	2.8%
Total	Other	3,758	4,084	3,182	2,709	3,134	16,867
	HAL	401	245	49	46	49	790
	Percent HAL	9.6%	5.7%	1.5%	1.7%	1.5%	4.5%

F: ADDITIONAL DOCUMENTS



HUMAN RIGHTS COMMISSION FAIR HOUSING COMMITTEE

February 11, 2015

To Whom It May Concern:

The Fair Housing Committee was formed, in part, to respond to impediments identified by the Analysis of Impediments Report (AI) and to those impediments identified by the Tulsa community. To that end, the Committee voted unanimously at its January 21, 2015, regular meeting to authorize comment on the draft of the forthcoming AI, in particular, Public Sector Impediment number 1, "Insufficient Understanding of Fair Housing Laws". The Committee agrees with the finding that Action Item 1.2, "Revise the city's fair housing ordinance for clarity and functionality" will do much to mitigate this identified impediment.

To that end, the Committee recommends that the City's fair housing ordinance be revised to include protection with respect to sexual orientation and gender identity ("LGBT"), in addition to those classes already protected under the current ordinance. Federal rules currently recognize the need to expand protected classes to include members of the LGBT community in all federally-funded programs. Aligning the City's fair housing policy with the federal policy will allow for clear and efficient enforcement of fair housing laws within the City of Tulsa.

The Committee further recommends that the City of Tulsa do all in its power to make the city a "substantially equivalent" jurisdiction for the purposes of enforcing fair housing laws. To that end, the Committee recommends that administrative hearing procedures be incorporated into the City's fair housing ordinance. It is the belief of the Committee that full economic participation by all citizens of Tulsa is critical to removing impediments to fair housing choice within the City of Tulsa. Recognizing the right of all Tulsans to participate in the buying, selling, renting, and leasing of housing within the City will affirmatively further fair housing and will assure those wishing to enter the market that their right to conduct business within the City will not be impeded by non-economic considerations.

Cordially,

Paul Kent, Chair
Fair Housing Committee, City of Tulsa

Members:

Greg Guerrero, Vice Chair	Nathan S. Harvill	Donnie House
Alisia Myers	Stephen Carr	Teressa L. Webster
Greg Shinn	Eric Hallet	Kristin Messerli
Malcolm E. Rosser IV	Rosa Martinez-Harris	

175 East 2nd Street – Suite 675 – Tulsa, OK 74103
Office 918.596.7818 Fax 918.596.7826

www.cityoftulsa.org/community-programs/human-rights.aspx

**MINUTES OF THE REGULAR MEETING OF THE COUNCIL OF THE CITY OF TULSA,
OKLAHOMA,**

held in the Council Room, One Technology Center, 175 E. 2nd St., 2nd Floor, on Thursday, February 12, 2015, at 6:00 P.M., to transact all business as set out in Notice and Agenda posted in the Office of the City Clerk, Room 260, 175 E. 2nd, on Tuesday February 10, 2015 at 4:21 P.M. An Addendum was posted Wednesday, February 11, 2015 at 12:38 P.M.

PROCLAMATION AND SPECIAL ANNOUNCEMENTS

CALL TO ORDER & ROLL CALL

Councilor Lakin called the meeting to order at 6:05 P.M.

ROLL CALL:

Henderson	Present
Cue	Present
Patrick	Present
Ewing	Present
Gilbert	Present
Dodson	Present
America	Present
Lakin	Present
Bynum	Present
Henderson	Present
Cue	Present
Present:	9
Absent	0

Staff Present

John Fothergill, Council Staff
David O’Meilia, City Attorney

1. RECEIPT & FILING OF MINUTES

No items this week. 04-387

2. APPOINTMENTS & REAPPOINTMENTS

- a. Adam Vanderburg - Appointment to the 2003 Sales Tax Overview Committee for a term which will expire 12/31/2018, replacing Eric Proctor. (CD-9) [PW 01/27/2015] [CC 02/12/15] 15-73-1

- b. Cheryl L. Baber - Reappointment to the Ethics Advisory Committee with a term expiring 12/01/17. (CD-9) [PW 02/05/15; CC 02/12/15] 13-42-2
- c. John Shivel - Reappointment to the Tulsa Metropolitan Area Planning Commission; term expires 1/18/2018; attended 67/72 meetings. (CD-9) [PW 2/05/15, CC 2/12/15] 06-1544-4
- d. Joan Seay - Reappointment to the Arts Commission of the City of Tulsa, term expires 12/14/2017; attended 10 of 10 meetings. (CD-9) [PW 02/05/15; CC 02/12/15] 08-2110-3
- e. Michael Covey - Reappointment to the Tulsa Metropolitan Area Planning Commission; term expires 1/18/2018; 60/65 meetings (CD-8) [PW 02/05/15; CC 02/12/15] 12-201-2
- f. Christine Kallenberger - Reappointment to the Arts Commission of the City of Tulsa, term expires 12/14/2017; attended 10/10 meetings. (CD-1) [PW 02/05/15; CC 02/12/15] 03-276-5

Public Speaker:: John Huffines spoke on items a. through f.

Henderson moved that items 2.a. through 2.f. be approved. Patrick seconded the motion.

ROLL CALL:

Patrick	Yea
Ewing	Abstained
Gilbert	Yea
Dodson	Yea
America	Yea
Lakin	Yea
Bynum	Yea
Henderson	Yea
Cue	Yea

Yeas:	8
Nays:	0
Absent:	0
Abstentions:	1

Motion Carried.

3. MAYOR’S ITEMS

- a. Mayor’s report on community events, briefing on City activities, City efforts and new business.

No report was given.

- b. Approval of independent auditing services with McGladrey, LLP. for Fiscal Year 2015, with four one- years options to renew for fiscal years 2016-2019. [UED 2/05/15; CC 2/12/2015] 10-244-6

- c. Donation of 37 trees, seven gallon size, by Greenleaf Nursery, Park Hill, OK to be planted in Veteran’s Park, along 21st St. and Boulder Ave. 15-184-1

Public Speaker: John Huffines spoke.

- d. License agreement between the City of Tulsa and the Heather Ridge Civic Association for median improvements at 93rd Street and South Sheridan (CD-8) [PW 02/05/2015; CC 02/12/2015] 15-121-1

- e. Special Event Application (Amended to change closing time of staging area): 2015 Sweetheart Run to be held at 200 S. Elgin Ave. and downtown on February 14, 2015. (CD-4) 12-23-5

No action was taken on this item.

- f. Special Event Application: Any Given Child Performances for Youth held on February 4 & 5, 2015 at Tulsa PAC. (CD-4) [CC 02/12/15] 15-181-1

Henderson moved that items 3.b., 3.c, 3.d. 3.f., excluding item 3.e., be approved. Patrick seconded the motion.

ROLL CALL:

Patrick	Yea	
Ewing	Yea	
Gilbert	Yea	
Dodson	Yea	
America	Yea	
Lakin	Yea	
Bynum		Yea
Henderson	Yea	
Cue	Yea	

Yeas: 9
 Nays: 0
 Absent: 0
 Abstentions: 0

Motion Carried.

4. AUTHORITIES, BOARDS & COMMISSIONS

- a. Final Plat: CVS Tulsa Addition plat located at northwest corner of East 31st St. South and South Garnett Rd. (TMAPC voted 9-0-0 to recommend approval on July 23, 2014.) (CD-6) 15-193-1

Henderson moved that item 4.a. be approved. Patrick seconded the motion.

ROLL CALL:

Patrick	Yea	
Ewing	Yea	
Gilbert	Yea	
Dodson	Yea	
America	Yea	
Lakin	Yea	
Bynum		Yea
Henderson	Yea	
Cue	Yea	

Yeas: 9
 Nays: 0
 Absent: 0
 Abstentions: 0

Motion Carried.

- b. Sales Tax Overview Committee Status Report for January, 2015. 15-197-1
 A representative from the Sales Tax Overview Committee presented this item.

5. PUBLIC HEARINGS

- a. Public hearing regarding the Analysis of Impediments to Fair Housing Choice Study for the purpose of public questions and comments pertaining to the Draft Analysis of Impediments Report. 15-86-1

Henderson moved to enter into Public Hearing, Patrick seconded the motion.

ROLL CALL:

Patrick	Yea	
Ewing	Yea	
Gilbert	Yea	
Dodson	Yea	
America	Yea	
Lakin	Yea	
Bynum		Yea
Henderson	Yea	
Cue	Yea	
Yeas:	9	
Nays:	0	
Absent:	0	
Abstentions:	0	

Motion Carried.

Nathan Harville, City of Tulsa, presented this item.

Speakers:

- Jamie Cox spoke.
- Toby Jenkins spoke.
- James Alexander, Jr. spoke.
- William Hinkle spoke.
- Sharon Bishop spoke.
- Chris Moore spoke.
- James Martin spoke.
- Kathy Hinkle spoke.
- Julia Thomas spoke.
- Chris Shoaf spoke.
- Elyssa Byrant spoke.

Without objection, the Council Chair announced they were exiting the Public Hearing.

6. ORDINANCES - FIRST READING

- a. Budget amendment ordinance making supplemental appropriations of \$120,000.00 from a transfer from the General Fund (Fund No. 1080) within the Community Oriented Policing Services (COPS) Grant Award Fund (Fund 5317). [PW 02/12/15; CC 02/19/15] 15-182-1
- b. Budget amendment ordinance to increase appropriations of \$185,000.00 within the Convention and Visitors Fund (Fund No. 2720). [UED 02/12/15; CC 02/19/15] 15-183-1
- c. Budget amendment making supplemental appropriation of \$30,423.16 from grant revenues to be received within the Miscellaneous Police Grants Fund No. 5312. [PW 02/12/15] [CC 02/19/15 & 03/05/15] 15-78-1
- d. Ordinance closing portions of two public ways (E. 5th St. and S. Florence Ave.) and an alley, requested by the University of Tulsa. Location: south and east of the southeast corner of S. College Ave. and E. 4th Pl. (CD-2) [PW 1/29/15; CC 02/12/2015; PH 02/19/2015] 15-89-1
- e. Ordinance closing a portion of a waterline easement located at Block 1, Northland Center, 591 E. 36th St. N., requested by the Board of Regents of the University of Oklahoma. (CD-1) [PW 02/05/2015: CC 02/05/15 & 02/12/15] 15-135-1

Without objection, the Council Chair forwarded items 6.a. though 6.e. for Second Reading on February 19, 2015.

7. ORDINANCES - SECOND READING

[7:19 P.M. - Councilors Ewing and Bynum recused.]

- a. Ordinance to close an alleyway located at 510 E. 2nd Street, requested by Matt Newman with the Ross Group. (CD-4) [CC 01/29/15] [CC 01/29/15] 15-46-3
- b. Ordinance closing a portion of a waterline easement located at 3133 East Young, requested by Kinslow, Keith, and Todd. (CD-3) [PW 02/05/2015: CC 02/05/15 & 02/12/15] 15-132-1

Henderson moved to approve items a. and b., Patrick seconded the motion.

ROLL CALL:

Patrick	Yea	
Ewing	Absent	
Gilbert	Yea	
Dodson	Yea	
America	Yea	
Lakin	Yea	
Bynum		Absent
Henderson	Yea	
Cue	Yea	

Yeas:	7
Nays:	0
Absent:	2
Abstentions:	0

Motion Carried.

[7:21 P.M. Councilors Ewing and Bynum returned.]

8. COUNCIL ITEMS

- a. Chairman’s report on community events, briefing on Council activities, Council efforts and new business. 98-849-2

No report was given.

[7:22 P.M. Cue recused]

- b. Acceptance of a donation from Growing Together not to exceed \$1,500.00 for Councilor Cue to attend the NeighborWorks Conference on neighborhoods in Los Angeles, California. 15-192-1
- c. ***Added by Addendum:*** Resolution amending Council Resolution No. 19578 approved by the Council on November 20, 2014, and signed by the Mayor on November 21, 2014, only as to the dollar amount of City of Tulsa funds authorized to be expended by the City to pay for the “Daily housing rate” at the Tulsa County Jail as it applies to housing City of Tulsa “Municipal Prisoners,” as defined by the Tulsa County Criminal Justice Authority. **(Emergency Clause) 14-1006-2**

Henderson moved to approve items b. and c., Patrick seconded the motion.

ROLL CALL:

Patrick	Yea
Ewing	Yea
Gilbert	Yea
Dodson	Yea
America	Yea
Lakin	Yea
Bynum	Yea
Henderson	Yea
Cue	Absent
Yeas:	8
Nays:	0
Absent:	1
Abstentions:	0

Motion Carried.

9. NEW BUSINESS

There was no new business.

10. HEARING OF APPEALS

[7:24 P.M. – Ewing, Lakin, Gilbert leave]

- a. Appeal of invoice #387109 in amount of \$500 by Brian Pingleton for abatement work performed at 10746 E. Skelly Dr., Tulsa. (CD5) [CC 02/12/15] 15-75-1

Ed Noviski, presented the City of Tulsa’s case.

Brian Pingleton, Appellant, presented his case.

Moved by Patrick, seconded by American, to waive the \$300.00 Administrative fee.

ROLL CALL:

Patrick	Yea
Ewing	Absent
Gilbert	Absent
Dodson	Yea
America	Yea

Lakin	Absent
Bynum	Yea
Henderson	Yea
Cue	Yea

Yeas:	6
Nays:	0
Absent:	3
Abstentions:	0

Motion Carried.

11. HEARING OF PUBLIC COMMENTS

a. No items this week. 04-387

12. ADJOURNMENT

Without objection, the Council Chair adjourned the meeting at 8:02 p.m.

PHA Plan Elements. (24 CFR 903.7)

1. Eligibility, Selection and Admission Policies, including Deconcentration and Wait List Procedures

Since no changes have occurred in THA's policies, the only required element to be sent to HUD is **Deconcentration**.

- a) THA has public housing developments which are covered by the de-concentration rule.
- b) All covered developments have incomes within the range of 85% to 115% of the average incomes of all such developments, with the upper range not being less than the limit at which a family would be defined as extremely low income.

DECONCENTRATION POLICY

It is the policy of the Housing Authority of the City of Tulsa (THA) to provide for deconcentration of poverty and encourage income mixing by bringing higher income families into lower income developments and lower income families into higher income developments. Toward this end, we will skip families on the waiting list to reach other families with a lower or higher income. We will accomplish this in a uniform and non-discriminating manner.

THA will affirmatively market our housing to all eligible income groups. Lower income residents will not be steered toward lower income developments and higher income people will not be steered toward higher income developments.

Prior to the beginning of each fiscal year, we will analyze the income levels of families residing in each of our developments, the income levels of census tracts in which our developments are located, and the income levels of the families on the waiting list. Based on this analysis, we will determine the level of marketing strategies and deconcentration incentives to implement. See attachments for recent analysis of jurisdiction.

Deconcentration Incentives

THA may offer one or more incentives to encourage applicant families whose income classification would help to meet the deconcentration goals of a particular development.

Various incentives may be used at different times, or under different conditions, but will always be provided in a consistent and nondiscriminatory manner.

Offer of a Unit

When THA discovers that a unit will become available, we will contact the first family on the waiting list who has the highest priority for this type of unit or development and

whose income category would help to meet the deconcentration goal and/or the income targeting goal.

THA will contact the family first by telephone to schedule an appointment. If the family cannot be reached by telephone, the family will be sent notification via first class mail.

After meeting with the Resident Selection Staff, an appointment will be made for the family to visit the development, view the unit and sign a lease agreement. If the family rejects the offer of the unit, THA will offer the unit to the next person on the waiting list in compliance with the aforementioned procedure.

PHA Plan Elements 10. Civil Rights Certification

Form HUD-50077-CR (1/2009), Civil Rights Certification is included in the PHA Plan. Also included is form HUD 50077-SL (1/2009), Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan. Both are found in Attachment J with all the certifications.

Public Housing

Civil Rights and Fair Housing Policy

It is the policy of the Housing Authority to comply fully with all Federal, State, and local nondiscrimination laws and with the rules and regulations governing Fair Housing and Equal Opportunity in housing and employment.

THA will not deny any family or individual the opportunity to apply for or receive assistance under the Public Housing Program on the basis of race, color, sex, religion, creed, national or ethnic origin, age, family, or marital status, handicap, disability or sexual orientation.

To further its commitment to full compliance with applicable Civil Rights laws, THA will provide Federal, State, and local information to Public Housing resident regarding “discrimination” and any recourse available to them if they are victims of discrimination. Such information will be made available during the move-in process, and all applicable Fair Housing Information and Discrimination Complaint Forms will be made a part of the New Resident packet.

Except as otherwise provided in 24 CFR 8.21(c)(1), 8.24(1), 8.25, and 8.31, no individual with disabilities shall be denied the benefits of, be excluded from participation in, or otherwise be subjected to discrimination because THA’s facilities are inaccessible to or unusable by persons with disabilities.

Posters and housing information are displayed in locations throughout THA’s office in such a manner as to easily readable from a wheelchair.

THA's Central Office at 415 E. Independence is accessible to persons with disabilities. Accessibility for the hearing impaired is provided by the TTD/TDY telephone number, 918/587-4712.

Assisted Housing

Civil Rights and Fair Housing Policy

It is the policy of the Housing Authority to comply fully with all Federal, State, and local nondiscrimination laws and with the rules and regulations governing Fair Housing and Equal Opportunity in housing and employment.

The HA shall not deny any family or individual the opportunity to apply for or receive assistance under the Public Housing Program on the basis of race, color, sex, religion, creed, national or ethnic origin, age, family, or marital status, handicap, disability or sexual orientation.

To further its commitment to full compliance with applicable Civil Rights laws, the HA will provide Federal, State, and local information to Assisted Housing clients regarding "discrimination" and any recourse available to them if they are victims of discrimination. Such information will be made available during the family briefing session, and all applicable Fair Housing Information and Discrimination Complaint Forms will be made a part of the Housing Choice Voucher holder's briefing packet.

Except as otherwise provided in 24 CFR 8.21(c)(1), 8.24(1), 8.25, and 8.31, no individual with disabilities shall be denied the benefits of, be excluded from participation in, or otherwise be subjected to discrimination because the HA's facilities are inaccessible to or unusable by persons with disabilities.

Posters and housing information are displayed in locations throughout the HA's office in such a manner as to easily readable from a wheelchair.

THA's Central Office at 415 E. Independence is accessible to persons with disabilities. Accessibility for the hearing impaired is provided by the TTD/TDY telephone number, 918/587-4712.

