

2011 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE FOR THE CITY OF TULSA, OKLAHOMA



FINAL REPORT

JULY 25, 2011

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Prepared for
The City of Tulsa
Department of Grants Administration

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HAS YOUR RIGHT TO FAIR HOUSING BEEN VIOLATED?

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

Tulsa Human Rights Department
175 East 2nd Street
One Technology Center, 8th Floor
Tulsa, OK 74103
(918) 596-7818
(918) 596-7826 (fax)

<http://www.cityoftulsa.org/community-programs/human-rights.aspx>

TABLE OF CONTENTS

EXECUTIVE SUMMARY	3
SECTION I. INTRODUCTION	17
SECTION II. SOCIO-ECONOMIC CONTEXT	25
Demographics	25
Economics	39
Housing	49
SECTION III. REVIEW OF THE FAIR HOUSING PROFILE	59
Fair Housing Organizations	59
Complaint and Compliance Review	64
Related National and Statewide Fair Housing Studies	67
SECTION IV. FAIR HOUSING IN THE PRIVATE SECTOR	73
Home Mortgage Disclosure Act Data	73
Fair Housing Complaints	93
Discrimination in Rental Advertising	98
Fair Housing Survey – Private Sector Results	100
SECTION V. FAIR HOUSING IN THE PUBLIC SECTOR	105
Fair Housing Survey – Public Sector Results	105
SECTION VI. PUBLIC INVOLVEMENT	111
Fair Housing Survey	111
Fair Housing Focus Groups	114
Fair Housing Forums	116
SECTION VII. RESEARCH CONCLUSIONS	119
SECTION VIII. IMPEDIMENTS AND SUGGESTED ACTIONS	121
APPENDIX A: ADDITIONAL CENSUS DATA	131
APPENDIX B: ADDITIONAL BLS/BEA DATA	133
APPENDIX C: ADDITIONAL HMDA DATA	139
APPENDIX D: ADDITIONAL PUBLIC INPUT DATA	149
APPENDIX E: ADDITIONAL SURVEY DATA	159
APPENDIX F: ADDITIONAL INFORMATION	177

EXECUTIVE SUMMARY

AI PURPOSE AND PROCESS

As part of the Consolidated Planning process and in exchange for receiving housing and community development federal funds, entitlement jurisdictions are required to submit certification of affirmatively furthering fair housing to the U.S. Department of Housing and Urban Development (HUD). This certification has three elements:

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

In the *Fair Housing Planning Guide*, page 2-6, HUD provides a definition of impediments to fair housing choice as:

- “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
- Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin.”

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 or local government may enact fair housing laws that extend protection to other groups, and the AI is expected to address housing choice for these additional protected classes as well.

The AI process involves a thorough examination of a variety of sources related to housing, affirmatively furthering fair 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 a public input and review process 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 recommended actions to overcome or lessen the effects of the identified impediments.

METHODOLOGY

As a requirement for receiving HUD formula grant funding, this AI evaluated impediments to fair housing choice in Tulsa, Oklahoma. Within the City of Tulsa, fair housing law is covered by the Oklahoma Anti-Discrimination Act, which includes the federal protections of race, color, religion, national origin, sex, disability and familial status but also includes the additional protection of age for persons over 18 years of age. As such, fair housing choice was addressed in the City of Tulsa in relation to this list of protected classes.

The AI was conducted through analysis of a variety of both quantitative and qualitative sources. Quantitative sources utilized for examination of fair housing choice within 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 from the Community Reinvestment Act,
- Home purchase data from the Home Mortgage Disclosure Act,
- Housing complaint and intake data from the U.S. Department of Housing and Urban Development, the Tulsa Human Rights Department, and Metropolitan Fair Housing Council of Oklahoma.

Qualitative research included evaluation of relevant existing fair housing studies and cases. Additionally, qualitative research was involved in the evaluation of information gathered from several public input opportunities conducted in relation to the AI including:

- An online survey of nearly 170 housing stakeholders throughout the area to investigate fair housing issues in the private and public sectors,
- Three focus groups involving persons in the housing industry to more deeply evaluate fair housing in relation to several issues including special needs populations, the home purchase market, and zoning and land use policies and practices,
- Fair housing forums to allow public input and reaction to preliminary findings of the AI.

Research conclusions were drawn from these sources and further evaluated based on HUD's definition of impediments to fair housing choice, as presented on the previous page. Ultimately, a list of impediments to fair housing choice in existence within the City of Tulsa was identified along with actions that could be implemented to overcome or ameliorate the identified impediments.

OVERVIEW OF FINDINGS

Socio-Economic Context

According to the U.S. Census Bureau, between 2000 and 2010 the population in the City of Tulsa decreased slightly from 393,049 to 391,906 persons or by 0.3 percent. American Community Survey data for population by age, representing a 2005 to 2009 average, show that most persons in the city were between the ages of 35 and 54. In terms of race and ethnicity, since 2000, the white population in the city actually declined by more than 10.0 percent while all other racial groups grew in size. The Hispanic ethnic population was also shown to have increased over the last decade and actually almost doubled in size to 55,266 persons. Some racial and ethnic populations, especially black and Hispanic groups, have been geographically concentrated in select areas of the city, specifically in North Tulsa, and these concentrations have been increasing over time. At the time of the 2000 census, the city had a disability rate of 20.5 percent, which was slightly higher than the 19.0 percent national rate. The disabled population was also slightly concentrated in select areas of the city, particularly in the northwestern portion.

Data from the Bureau of Labor Statistics showed that the labor force in Tulsa, defined as people either working or looking for work, held relatively stable at 190,155 persons between 2008 and 2009, but total employment figures dropped significantly to 177,867 persons. As a result of the increasing labor force and decreasing employment rate, the unemployment rate increased from 3.5 percent in 2008 to 6.5 percent in 2009 and then to 7.1 percent by the end of 2010. Data from the Bureau of Economic Analysis showed that average earnings per job in Tulsa have been stronger than state figures with the city average almost \$10,000 greater than the average for Oklahoma. In Tulsa, the poverty rate average for 2005 through 2009 was 19.0 percent with 71,041 persons considered to be living in poverty, and this group was concentrated primarily in the northern part of the city. Evaluation of the location of job and employment centers in relation to transportation showed that the placement of these services may not be adequately addressing the needs of North Tulsa. Further, analysis of community investment data demonstrated that North Tulsa may not be receiving equitable community lending.

The number of housing units in Tulsa County increased by 9.5 percent or from 243,953 units to 267,021 units between 2000 and 2009. Still, the majority of the housing stock was built in the 1970s. Of the 243,953 housing units reported in the 2000 census, about 65.0 percent were single-family units, and more recent data from the U.S. Census Bureau showed that this percentage held steady. A total of 165,842 units were occupied housing units, and, of these, 55.6 percent were owner-occupied and 44.4 percent were renter-occupied. Of the unoccupied housing units counted in the city in 2000, 2,421 were noted to be “other vacant” units that are unavailable to the marketplace and can contribute to blight; more recent data show that the percentage of this type of unit may be increasing in the city. At the time that the 2000 census was taken, 4,233 or 2.6 percent of households were overcrowded and another 3,253 or 2.0 percent of households were severely overcrowded, but 2005 to 2009 data averages show that the percentage of units with this housing problem might be decreasing. In Tulsa, 0.7 and 0.9 percent of all households were lacking complete plumbing or kitchen facilities, respectively, in 2000 but this housing problem was shown to have worsened in more recent data. Additionally, in 2000 14.7 percent of households had a cost burden and 10.8 percent of households had a severe cost burden, but 2005 to 2009 data averages showed that both of these percentages increased since that time by nearly 4.0 percentage points.

Evaluation of the Fair Housing Profile

A review of the fair housing profile in the City of Tulsa revealed that the City has a solid and present fair housing structure. There are several organizations that provide fair housing services, including outreach and education, complaint intake, and testing and enforcement activities, for both providers and consumers of housing. These organizations include the U.S. Department of Housing and Urban Development (HUD), the Oklahoma Human Rights Commission, which exists as a substantially equivalent agency to HUD in the state, the Tulsa Human Rights Department, the Metropolitan Fair Housing Council of Oklahoma, and the Tulsa Fair Housing Partnership. Many of these groups accept fair housing complaints, and the complaint process within these organizations is accessible and straightforward. Examination of both national and local fair housing studies and cases supported the idea that while housing discrimination has improved in recent years, both nationally and locally, problems still exist.

Fair Housing in the Private Sector

Home Mortgage Disclosure Act (HMDA) data were used to analyze differences in denial rates in the city by race, ethnicity, gender, income and census tract. Evaluated home purchase loan applications from 2004 through 2009 showed that there were 38,457 loan originations and 7,568 loan denials, for an average six-year loan denial rate of 16.4 percent. These HMDA data also showed that American Indian, black and Hispanic applicants experienced significantly higher rates of loan denials than white or Asian applicants, even after correcting for income. Further, these highly denied racial and ethnic groups appear to have been disproportionately impacted in some geographic areas of the city, primarily in North Tulsa, where denial rates at times exceeded 80.0 percent. Analysis of high annual percentage rate loans (HALs) showed that the black and Hispanic populations were also disproportionately impacted by an unusually higher share of these lower-quality and potentially predatory loans and therefore may be more likely to carry a larger burden of foreclosure.

Fair housing complaint data was collected from HUD and the Tulsa Human Rights Department. Data from these sources showed that more than 120 complaints were filed in the city from 2004 through 2010. The protected classes appearing to be disproportionately impacted by discrimination in rental markets were disability and race, and the common complaint issues related to discriminatory terms, conditions, privileges, or services and facilities, especially relating to the rental market. Intake data from Metropolitan Fair Housing Council of Oklahoma showed similar frequent bases.

A review of Craigslist postings for a sample of days in February 2011 also revealed instances of poor language choices in advertisements in the rental market with preferential statements made based on age, family status and religion. These statements may be construed as discriminatory preferences in advertising of housing.

Results from the fair housing survey that was conducted as part of the AI process showed that many respondents see possible issues of housing discrimination in Tulsa's private housing sector. In the rental market, preferences in rental advertising, refusal to rent, and discriminatory terms and conditions made were identified as possible barriers to fair housing. In the real estate market, respondents noted that steering activities occur, and in the home purchase markets, redlining and predatory lending were noted to be concerns. Redlining was also noted to be a barrier to fair housing in the insurance industry along with inflated insurance prices.

Fair Housing in the Public Sector

The status of affirmatively fair housing within Tulsa's public sector was primarily evaluated through the fair housing survey of stakeholders in the city. Results from the public sector section of the fair housing survey showed that many respondents in Tulsa believe there are questionable practices or policies within the public sector. Most comments portrayed fair housing issues in relationship to problems in existence in North Tulsa. For example, comments suggested possible differences in construction standards between North and South Tulsa, a lack of focus on community development in the north part of the city, and also lack of access to government services including transportation and trash service in North Tulsa. Additional concerns related to a lack of accessibility and accommodation for persons with disabilities within public housing agencies.

Public Input

A number of public involvement activities conducted through the AI process, including a fair housing survey, fair housing focus groups, and fair housing forums, provided insight into fair housing issues in the city. Results from the fair housing survey showed that most respondents feel that fair housing laws are useful but that they are difficult to understand or follow; this was reaffirmed by indication of some confusion as to which classes of persons are protected by state and federal laws as well as where to refer someone with a fair housing complaint. Misunderstanding was also shown in comments that included housing production and affordable housing issues as barriers to fair housing choice. Additionally, it was noted that enhanced testing and outreach and education activities may be needed. Comments gathered from housing stakeholders in the city during a series of focus groups demonstrated concerns about: a lack of understanding of fair housing and enforcement of fair housing laws in the city, a high number of predatory loans in the city which have led to further problems of foreclosure and blight, and continued disparities in housing and housing services for North Tulsa. Three fair housing forums, or public input opportunities, were also held in the city, and attendants cited concerns including steering, lack of enforcement of fair housing laws, and a need for greater city-wide commitment to fair housing.

IMPEDIMENTS TO FAIR HOUSING CHOICE AND SUGGESTED ACTIONS

The 2011 AI for the City of Tulsa uncovered many issues in housing in the city. Selection of items as impediments to fair housing choice was based on HUD's definition of impediments as *actions, omissions or decisions that restrict housing choice due to protected class status*. The identified impediments are presented below and are followed by appropriate actions that the City can implement in order to mitigate, alleviate or eliminate these impediments and thereby offer greater housing choice for protected classes as well as for all citizens of Tulsa.

Impediments to Fair Housing Choice

Private Sector

1. Discriminatory terms, conditions, privileges, or services and facilities in the rental markets
2. Refusal to rent or negotiate for rent
3. Failure to make reasonable accommodation or modification
4. Statement of preferences in advertising for rental properties
5. Steering, redlining, reverse redlining and blockbusting in residential sales
6. Denial of home purchase loans
7. Predatory lending activities
8. Unequal investment of Community Reinvestment Act resources
9. "Not in My Backyard" (NIMBY) tendencies
10. Failure to actively participate in the fair housing system

Public Sector

1. Ineffective fair housing outreach and education efforts
2. Failure to adequately enforce fair housing laws

3. Historical establishment of policies and practices resulting in segregation of minority populations
4. Inequitable community development activities
5. Land use and planning decisions resulting in unequal access to government services such as transportation and trash pickup
6. Failure to provide reasonable accommodation in public housing

Impediments Matrix

A matrix was used to more closely detail the source or sources from which the impediments were derived. Table 1, on the following page, lists the impediments, by private and public sector, and demonstrates which sources supported the issue as an impediment to fair housing choice within the City of Tulsa. The protected classes most often noted to be cited in relation to the impediment have been included along with a ranking of need for action. A notation of "H" indicated a high need for action, "M" suggests a moderate need for action, "L" indicated a low need for action, and "N" specifies that no action is required.

**Table 1
Impediments Matrix
2011 Tulsa, Oklahoma AI**

Impediment	Source										Protected Classes Most Affected	Need for Action	
	Census Data	Review of Fair Housing Profile	Literature/Case Review	HMDA Data	Housing Complaint Review	Advertisement Analysis	Fair Housing Survey	Fair Housing Focus Groups	Fair Housing Forums	Other			
Private Sector													
Discriminatory terms, conditions, privileges, or services and facilities in the rental markets					X		X					Race, national origin, disability	H
Refusal to rent or negotiate for rent					X		X					National origin, race, disability	H
Failure to make reasonable accommodation or modification					X							Disability	H
Statement of preferences in advertising for rental properties						X	X					Age, family status, religion	M
Steering, redlining, reverse redlining and blockbusting in residential sales							X					Race, national origin, disability	M
Denial of home purchase loans			X	X			X	X				Race, national origin, sex	M
Predatory lending activities			X	X			X					Race, national origin	H
Unequal investment of Community Reinvestment Act resources	X		X							X		Race, national origin, disability	L
"Not in My Backyard" (NIMBY) tendencies							X					Disability	L
Failure to actively participate in the fair housing system							X		X			All	H
Public Sector													
Ineffective fair housing outreach and education efforts						X	X	X	X			All	H
Failure to adequately enforce fair housing laws							X	X	X			All	H
Historical establishment of policies and practices resulting in segregation of minority populations	X		X				X					Race, national origin, disability	M
Inequitable community development actions							X					Disability, race, national origin	H
Land use and planning decisions resulting in unequal access to government services such as transportation and trash pickup							X	X		X		Race, national origin, disability	H
Failure to provide reasonable accommodation in public housing					X		X					Disability	H

Suggested Actions to Resolve Impediments

The City of Tulsa benefits from a substantive fair housing infrastructure. The City should focus fair housing efforts on continuing current activities as well as including additional efforts and activities as follows:

Private Sector

1. Impediment: Discriminatory terms, conditions, privileges, or services and facilities in the rental markets
Recommended Actions: Conduct testing and enforcement activities; continue to educate landlords and property management companies in fair housing law; continue to educate housing consumers in fair housing rights
2. Impediment: Refusal to rent or negotiate for rent
Recommended Actions: Conduct testing and enforcement activities; continue to educate landlords and property management companies in fair housing law; continue to educate housing consumers in fair housing rights
3. Impediment: Failure to make reasonable accommodation or modification
Recommended Actions: Conduct testing and enforcement activities; hold training sessions to educate housing providers in requirements regarding reasonable accommodation or modification
4. Impediment: Statement of preferences in advertising for rental properties
Recommended Actions: Educate landlords and property management companies in fair housing law
5. Impediment: Steering, redlining, reverse red-lining and blockbusting in residential sales
Recommended Actions: Conduct testing activities to determine the severity of the problem; work to resolve these issues in the real estate industry through education and enforcement
6. Impediment: Denial of home purchase loans
Recommended Actions: Conduct testing activities to determine the severity of the problem; educate buyers through credit counseling and home purchase training
7. Impediment: Predatory lending activities
Recommended Actions: Conduct testing activities to determine the severity of the problem; conduct enforcement activities as needed; educate buyers through credit counseling and home purchase training
8. Impediment: Unequal investment of Community Reinvestment Act resources
Recommended Actions: Monitor Community Reinvestment Act lending practices; advise Bankers' Association of findings, iterate the need for city-wide investment strategies; build vision of citywide investment approach

9. Impediment: “Not in My Backyard” (NIMBY) tendencies
Recommended Actions: Work to promote development of residential housing in North Tulsa and public housing outside of North Tulsa
10. Impediment: Failure to actively participate in the fair housing system
Recommended Actions: Enhance current outreach and education efforts to make fair housing more approachable and accessible for housing consumers

Public Sector

1. Impediment: Ineffective fair housing outreach and education efforts
Recommended Actions: Evaluate current fair housing outreach and education efforts; examine ways in which these activities could be made more effective; implement enhancements
2. Impediment: Failure to adequately enforce fair housing laws
Recommended Actions: Increase the level of monitoring, testing and enforcement of laws related to fair housing; select some testing results for enforcement including conciliation and/or litigation
3. Impediment: Historical establishment of policies and practices resulting in segregation of minority populations
Recommended Actions: Review land use and planning policies and practices in the city; encourage change, such as enhanced inclusionary zoning policies or waiving impact fees for affordable housing projects, and modification of planning and zoning ordinances and land use practices as needed
4. Impediment: Inequitable community development activities
Recommended Actions: Refocus community development efforts to more broadly address community development issues in North Tulsa; coordinate with citywide private investment strategies
5. Impediment: Land use and planning decisions resulting in unequal access to government services such as transportation and trash pickup
Recommended Actions: Evaluate current and future planning decisions in relation to placement of government services such as bus routes and trash collection; make changes to improve equity
6. Impediment: Failure to provide reasonable accommodation in public housing
Recommended Actions: Conduct testing and enforcement activities; advise public housing agencies of scope and severity of problem; request and monitor change

Three City Council Initiatives

Completion of adequate fair housing planning is a requirement of the Consolidated Plan, and HUD’s FHEO review and approval of that plan will be accomplished when specific actions with measurable outcomes are described in the upcoming Annual Action Plan. Furthermore,

specific City agencies such as the Department of Grants Administration (DGA), the Human Rights Department (HRD), or another agency altogether must take lead responsibility for one or more of these actions, at the discretion of the City Council.

Nevertheless, the aforementioned public and private sector fair housing actions could have either a broad or narrow definition or approach, depending on the resource commitment made by the City and the City Council. Such definition will need to be provided by and approved by the City Council.

To initiate this dialogue, the 2011 Tulsa AI suggests that the City Council approve and the City allocate 2.0 percent of its annual HUD CPD formula grant toward these additional fair housing activities. In fiscal 2010, this would have been 2.0 percent of roughly \$6.8 million dollars, or \$138,000.

The 2.0 percent allocation would be used to contractually secure fair housing services through one or more of the existing entities comprising Tulsa's fair housing infrastructure with the contractual arrangements specifying the level and scope of outreach, education, testing and enforcement that Tulsa will conduct over the upcoming federal fiscal year.

In summary, the 2011 Tulsa AI recommends that:

1. The City Council designate a responsible agency for each impediment and its consequent action; and,
2. The City Council designate an appropriate percent allocation from the HUD CPD grant to be dedicated to fair housing service activities, if 2.0 percent is not acceptable; and,
3. The City Council approve the final contract, or contracts, to be let for fair housing services each year.

Specific Proposed Actions

On January 18, 2011, the Human Rights Commission (HRC) of the City of Tulsa discussed the AI. A motion was made at this meeting to restate the HRC's responsibility under Title 5 of Tulsa Revised Ordinances (presented in Appendix F) and to highlight the importance of the Department of Grants Administration to consider Section 104 of Title 5, "Discrimination in Housing Prohibited."

Due to the fact that the Human Rights Department (HRD) holds responsibility for the implementation and enforcement of Title 5, it was determined that the HRD should be the lead agency in implementing each of the recommendations presented in this AI, with the exception of the testing activities. The Department of Grants Administration (DGA) recommended that the City Council implement the 2.0 percent allocation of CDBG funding to the HRD as proposed in this AI.

The strategic goals of the HRD include monitoring the planning, program development, subrecipient capacity-building, outreach and advocacy for subrecipients and citizens in relation to HUD grants. The HRD recognizes the need to have well-trained and dedicated staff members available to support the City in its efforts to remove impediments to fair housing

choice for citizens of Tulsa. In this spirit, efforts will be made by the DGA to make the following items available to the HRD:

1. Contract with an outside organization to provide testing services,
2. Utilize the procedures outlined in Title 5, Sections 107, 108 and 109 of the Tulsa Revised Ordinances to conduct enforcement,
3. File any violations, found by testing agency, with HRD for conciliation or referral,
4. Ongoing education/training in this area for HRD's Director, Program Resource Analyst, and Compliance Investigator,
5. Outreach and education opportunities for landlords, tenants, banking institutions, property managers, etc., and
6. Leverage and strengthen partnerships with Tulsa Area Fair Housing partnerships and CHDO agencies.

The specific corrective actions to be taken are presented in Table 2, on the following pages.

**Table 2
Proposed Actions
2011 Tulsa, Oklahoma AI**

	Sector	Impediment	Recommendations	Action Plan
1A	Private	Discriminatory terms, conditions, privileges or services and facilities in rental markets	Conduct testing and enforcement activities	<ol style="list-style-type: none"> 1. Contract with outside organization to provide testing services 2. Utilize the procedures outlines in Title 5, Sections 107, 108 and 109 of the Tulsa Revised Ordinances to conduct enforcement 3. Any violations found by the testing agency should be filed with the City of Tulsa Human Rights Department for conciliation or referral
1B			Continue to educate landlords and property management companies in fair housing law	Encourage and develop partnerships among TFHP, subrecipients and the City of Tulsa in outreach and educational opportunities with tenants, landlords and property management companies
1C			Continue to educate housing consumers in fair housing rights	See 1B
2A	Private	Refusal to rent or negotiate for rent	Conduct testing and enforcement activities	See 1A
2B			Continue to educate landlords and property management companies in fair housing law	See 1B
2C			Continue to educate housing consumers in fair housing rights	See 1C
3A	Private	Failure to make reasonable accommodation	Conduct testing and enforcement activities	See 1A
3B			Hold training sessions to educate housing providers in requirements regarding reasonable accommodation or modification	Coordinate with TFHP to provide educational programs for housing providers to assist them with understanding the interrelation of fair housing laws and the Americans with Disabilities Act
4	Private	Statement of preferences in advertising for rental properties	Educate landlords and property management companies in fair housing law	See 1B
5A	Private	Steering, redlining, reverse redlining, and blockbusting in residential sales	Conduct testing activities to determine the scope and severity of the problem	See 1A
5B			Work to resolve these issues in the real estate industry through education and enforcement	<p>Require language in every HOME recipient contract that the subrecipient understands redlining, reverse redlining, and blockbusting are illegal and that the subrecipient will not participate in those activities</p> <p>Hold educational activities to inform homebuyers and potential homebuyers what would constitute the above and how the public can file a complaint with the City of Tulsa or appropriate federal agency.</p>

6A	Private	Denial of home purchase loans	Conduct testing activities to determine the severity of the problem	See 1A
6B			Educate buyers through credit counseling and home purchase training	See 1 B Partner with local non-profits to educate buyers
7A	Private	Predatory lending activities	Conduct testing activities to determine the severity of the problem	See 1A
7B			Conduct enforcement activities as needed	See 1A
7C			Educate buyers through credit counseling and home purchase training	See 1B
8A	Private	Unequal investment of Community Reinvestment Act resources	Monitor Community Reinvestment Act lending practices	Fund coordinator position within the City to ensure that Community Reinvestment Act funds are being utilized in areas of greatest need
8B			Advise Bankers' Association of findings	Hold "summit" with local Bankers' Association to appraise them of the problem and provide information to develop a strategy for remedying deficiencies
8C			Iterate the need for city-wide investment strategies	See 8B and include TMAPC, City of Tulsa Planning Department, and CHDOs
8D			Build vision of citywide investment approach	See 8C
9	Private	"Not In My Backyard" (NIMBY) tendencies	Work to promote development of residential housing in North Tulsa and public housing outside of North Tulsa	De-concentrate "low-income" properties away from one area of town Possibly limit the size of new multi-family developments Work on integrating every area of the city equally Utilize the expertise and resources of the Working in Neighborhoods (WIN) Department
10	Private	Failure to actively participate in the fair housing system	Enhance current outreach and education efforts to make fair housing more approachable and accessible for housing consumers	See 1B Partner with local TFHP, CHDOs and subrecipients to educate buyers
1A	Public		Evaluate current fair housing outreach and education efforts	Use internal reporting to reveal the effect of those efforts through the utilization of document tracking, reports and impact studies
1B			Examine ways in which these activities could be made more effective	Compare findings with other cities of comparable size and demographics
1C			Implement enhancements	Utilize the procedures outlines in Title 5, Sections 107, 108 and 109 of the Tulsa Revised Ordinances to conduct enforcement
2A	Public	Failure to adequately enforce fair housing laws	Increase the level of monitoring, testing and	1. Contract with outside organization to provide testing

			enforcement of laws related to fair housing	<p>services</p> <p>2. Utilize the procedures outlines in Title 5, Sections 107, 108 and 109 of the Tulsa Revised Ordinances to conduct enforcement</p> <p>3. Any violations found by the testing agency should be filed with the City of Tulsa Human Rights Department for conciliation or referral</p>
2B			Select some testing results for enforcement, including conciliation and/or litigation	See 1A (private sector)
3A	Public	Historical establishment of policies and practices resulting in segregation of minority populations	Review land use and planning policies and practices in the city	Participate in the meetings and discussions with the Planning Department related to implementing the PLANiTULSA Comprehensive Plan, Consolidated Plan and Annual Action Plans (related to housing) in order to meet any residual effects of prior planning policies
3B			Encourage change, such as enhance inclusionary zoning policies or waiving impact fees for affordable housing projects, and modification of planning and zoning ordinances and land use practices as needed	<p>See 3A</p> <p>Deconcentrate "low income" properties away from one area of town</p> <p>Possibly limit the size of new multi-family developments</p> <p>Work on integrating every area of the city</p>
4A	Public	Inequitable community development activities	Refocus community development efforts to more broadly address community development issues in North Tulsa	Fund coordinator position within the City to ensure that funds are being utilized in developing North Tulsa
4B			Coordinate with citywide private investment strategies	See 4A
5A	Public	Land use and planning decisions resulting in unequal access to government services and trash pickup	Evaluate current and future planning decisions in relation to placement of government services such as bus routes and trash collection	<p>See 3A</p> <p>Include TMAPC and the MTTA in the discussions, etc.</p>
5B			Make changes to improve equity	TBD
6A	Public	Failure to provide reasonable accommodation in public housing	Conduct testing and enforcement activities	See 1A (private sector)
6B			Advise public housing agencies of scope and severity of problem	Encourage partnerships between subrecipients and the City of Tulsa in outreach and educational opportunities with tenants, landlords and property management companies
6C			Request and monitor change	<p>Fund coordinator position within the City to ensure that funds are being utilized in developing North Tulsa</p> <p>Encourage and develop partnerships among TFHP, subrecipients and the City of Tulsa in outreach and education opportunities with tenants, landlords and property management companies</p>

SECTION I. INTRODUCTION

BACKGROUND

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 because of a person's race, color, religion or national origin. Sex was added as a protected class in the 1970s. In 1988, the Fair Housing Amendments Act added familial status and disability to the list, making a total of seven federally protected classes. Federal fair housing statutes are largely covered by the following three pieces of U.S. legislation:

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

State or local government may enact fair housing laws that extend protection to other groups as well. For example, the Oklahoma Anti-Discrimination Act includes the federal protections of race, color, religion, national origin, sex, disability and familial status but also extends additional protections by age to persons aged 18 or older.

WHY ASSESS FAIR HOUSING?

Provisions to affirmatively furthering fair housing are long-standing components of the U.S. Department of Housing and Urban Development's (HUD) housing and community development programs. These provisions flow from Section 808(e) (5) of the Federal Fair Housing Act, which requires that the Secretary of HUD administer its 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 the Consolidated Plan for Housing and Community Development. This document grouped the plans for original consolidated programs including Community Development Block Grants (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grants¹ (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) along with additional program components that have been enacted.

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

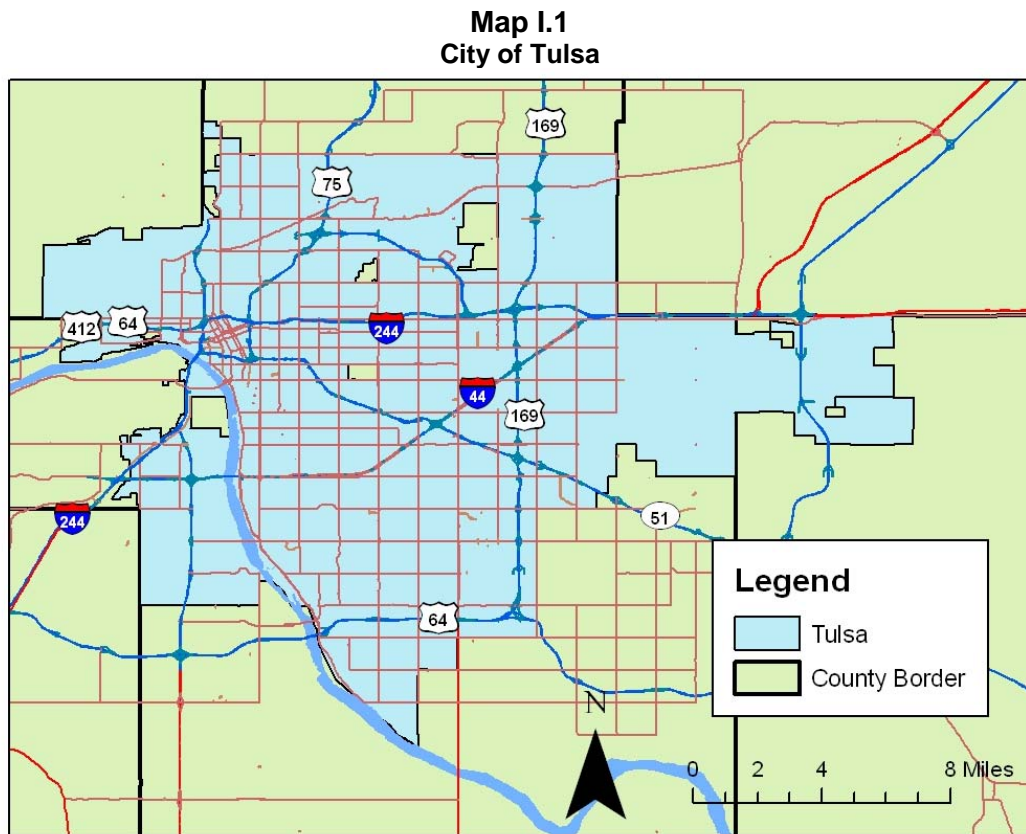
¹ The Emergency Shelter Grant was recently renamed the Emergency Solutions Grant.

HUD interprets these three certifying elements to entail:

- Analyzing and working to eliminate housing discrimination in the jurisdiction;
- Promoting fair housing choice for all people;
- Providing opportunities for racially and ethnically inclusive patterns of housing occupancy;
- Promoting housing that is physically accessible to, and usable by, all people, particularly individuals with disabilities; and
- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act.²

PURPOSE OF THIS RESEARCH

The purpose of the 2011 Tulsa AI is to research, analyze and identify prospective impediments to fair housing choice in the City of Tulsa and to suggest actions that the City can consider in working toward eliminating, overcoming or mitigating the identified impediments. A map of the City of Tulsa is presented below.



² *Fair Housing Planning Guide*. U.S. Department of Housing and Urban Development. March 1996, pg.1-3.

RESEARCH METHODOLOGY

The AI process involves a thorough examination of a variety of sources related to housing, affirmatively furthering fair housing, the fair housing delivery system and housing transactions, particularly for persons who are protected under fair housing law. AI sources include census data, employment and income information, home mortgage application 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 through four general approaches:

1. *Primary Research* – the collection and analysis of raw data that did not previously exist;
2. *Secondary Research* – the review of existing data and studies;
3. *Quantitative Analysis* – the evaluation of objective, measurable and numerical data;
4. *Qualitative Analysis* – the evaluation and assessment of subjective data, such as people’s beliefs, feelings, attitudes, opinions and experiences.

Some of the baseline secondary and quantitative data providing a picture of the city’s housing marketplace were drawn from the U.S. Census Bureau from 2000 and 2010 census counts, intercensal estimates as well as 2005 through 2009 American Community Survey data averages. Data from this source included population, personal income, poverty estimates, housing units by tenure, cost burdens and housing conditions. Employment and economic data were drawn from records provided by the Bureau of Labor Statistics and the Bureau of Economic Analysis. The narrative below offers a brief description of other key data sources employed for the 2011 Tulsa AI.

Home Mortgage Disclosure Act Data

To examine possible fair housing issues in the home mortgage market, Home Mortgage Disclosure Act (HMDA) data were analyzed. 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, census tract in which the home is located, and information concerning prospective lender actions related to the loan application. For this analysis, HMDA data from 2004 through 2009 were analyzed with the measurement of denial rates by census tract and by race and ethnicity of applicants as well as the reasons for denial as the key research objectives. These data were also examined to identify the groups and geographic areas most likely to encounter high interest rate loans.

Fair Housing Complaint Data

Housing complaint data were used to analyze housing discrimination in the renting and selling of housing. HUD provided fair housing complaint data for the City of Tulsa from 2004 through 2010. That information included basis of complaint, issues pursuant to the grievance and closure status of the alleged fair housing infraction, which relates to the result of the

investigation including any testing conducted in the enforcement process. Complaint data were also received from the Tulsa Human Rights Department, and intake data was received from Metropolitan Fair Housing Council of Oklahoma. This review of more than 120 fair housing complaints allowed for inspection of the tone and relative degree and frequency of certain types of unfair housing practices seen in the city and the degree to which they were found to be with cause. Analysis of complaint data also focused on determining which protected classes may have been disproportionately impacted by housing discrimination based on the number of complaints, all the while acknowledging that many individuals may be reluctant to step forward with a fair housing complaint for fear of retaliation or similar repercussion.

2011 Tulsa Fair Housing Survey

One of the methods HUD recommends for gathering public input about perceived impediments to fair housing is to conduct a survey. The City of Tulsa elected to utilize such a survey instrument to measure the degree of understanding of fair housing laws and protected classes, awareness of the complaint process, knowledge of possible barriers to fair housing within the private housing sector, perceptions of state and local government policies within the public sector that might adversely affect fair housing, and also views on the effectiveness of fair housing laws. This step was a cost-effective, efficient method to target research resources. The 2011 Tulsa Fair Housing Survey, which was conducted primarily online, received a total of 166 responses.

The 2011 survey targeted individuals involved in the housing arena. The prospective contact list was assembled by the lead agency and consulting organization with the goal of targeting experts in at least the following areas:

- Residential and commercial building codes and regulations,
- State, local and federal occupancy standards,
- Residential health and safety codes and regulations (structural, water and sewer),
- State and local land use planning,
- Banking and insurance laws and regulations,
- Real estate development, real estate sales and management laws and regulations,
- Renter rights and obligations, including civil rights,
- Fair housing, disability, social service and other advocacy organizations,
- Habitat for Humanity or similar housing providers.

The survey approach also assured that selected target populations, through their in-need service provider network or advocacy organizations, were well represented. Furthermore, these entities were utilized to help publicize fair housing planning activities and promote public involvement throughout the AI process.

The survey protocol involved sending an e-mail announcement to each prospective respondent with an introduction to the upcoming survey, its purpose and its intent. A link was provided that directed the respondent to the online survey. The e-mail message also urged respondents to forward the survey announcement to any other individual or agency involved in housing.

Furthermore, the announcement and survey link were posted on the lead agency's website and printed copies were made available during public meetings.

As noted above, 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 this issue was non-existent in the city but rather that there was not a large perception of its prevalence as gauged by survey participants.

The following narrative summarizes key survey themes and data that were to be collected from the survey instrument.

Federal, State and Local Fair Housing Law

Awareness of fair housing laws, understanding of fair housing laws including protected classes, availability of fair housing training and knowledge of the fair housing complaint referral process were the topics of concern in this section. Answers to these questions provided a snapshot of understanding and awareness of fair housing in the city.

Fair Housing in the Private Sector

This section addressed fair housing in Tulsa's private housing sector and offered a series of two-part questions. The first part asked for the respondent 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 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, sub-standard rental housing, occupancy rules, or other fair housing issues in the private housing sector in the city.

Fair Housing in the Public Sector

In a manner similar to the previous section, respondents were asked to offer insight into awareness of questionable practices or barriers to fair housing in the public sector. A list of areas within the public housing sector was provided and respondents were asked to first specify their awareness of fair housing issues within each area and then, if they were indeed aware of any such fair housing issues, to further describe these areas in a narrative fashion.

Respondents were asked to identify fair housing issues within the following public housing sector areas:

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

Respondents were also asked to identify their awareness of barriers that limit access to Tulsa's government services including public housing, transportation or employment services, and also to indicate their awareness of any fair housing compliance issues with local public housing authorities.

The questions in this section were used to identify fair housing issues in the city in relation to zoning, building codes, accessibility compliance, subdivision regulations, displacement issues, development practices, residency requirements, property tax policies, land use policies, or NIMBYism.³

Fair Housing Activities in Tulsa

The questions in this section were utilized to measure the awareness of respondents of fair housing outreach and education activities, fair housing testing efforts, and a city fair housing plan. Respondents were asked if they were aware of specific geographic areas within the city with fair housing problems and also if they believed that fair housing laws in the city are effective or if they should be changed. The purpose of this section was to gain insight into the effectiveness of current fair housing activities in the city and possible ways to improve the delivery of fair housing services in Tulsa.

LEAD AGENCY

The City of Tulsa, Department of Grants Administration, was the lead agency for preparing the 2011 Analysis of Impediments to Fair Housing Choice. Western Economic Services, LLC, a Portland, Oregon-based consulting firm specializing in analysis and research in support of housing and community development planning, prepared this AI.

Commitment to Fair Housing

In accordance with the applicable statutes and regulations governing the Consolidated Plan, the City of Tulsa certifies that it will *affirmatively further fair housing*. This statement means that the City has conducted an AI, will take appropriate actions to overcome the effects of any

³ Not In My Backyard

impediments identified through that analysis, and will maintain records reflecting that analysis and actions taken in this regard.

PUBLIC INVOLVEMENT

The City conducted the public input process associated with this AI. The key actions that were used to notify the public of the AI process included e-mail announcements, public postings, and other communication activities directed to citizens and stakeholders in the fair housing arena.

The City held three fair housing focus groups with stakeholders from throughout the housing sector in order to gain further insight into the status of fair housing within the City of Tulsa. The meetings were held February 23 through 24, 2011 at the Tulsa City Hall. Feedback received at these meetings is discussed in Section VI and a complete listing of comments is presented in Appendix D.

Additionally, the City held public input meetings, or fair housing forums, on April 13 and 14 in Tulsa. These meetings were designed to offer the public the opportunity to supply commentary on the status of fair housing in Tulsa as well as provide feedback on the initial findings of the AI. A more detailed discussion of these meetings is presented in Section VI.

The draft report for public review was released for public review on May 18, 2011, and initiated a 30-day public review period. The final report was released on June 30, 2011, and is available online at the City of Tulsa website at <http://www.cityoftulsa.org/>. Documentation pertaining to advertisements placed and the dates and publications in which those advertisements were placed on are file with the City of Tulsa Department of Grants Administration.

SECTION II. SOCIO-ECONOMIC CONTEXT

INTRODUCTION

This section presents demographic, economic and housing information collected from: the U.S. Census Bureau, the Bureau of Economic Analysis, the Bureau of Labor Statistics and other sources. Data were used to analyze a broad range of socioeconomic characteristics including population, race, ethnicity, disability, employment, poverty concentrations and housing trends. Ultimately, the information presented in this section illustrates the underlying conditions that have helped shape housing market behavior and housing choice in Tulsa.

While the entirety of data from the 2010 census count is not available, some information, such as the total count of population and counts of population by race and ethnicity, has been released. To supplement 2000 census data, information for this analysis was also gathered from the U.S. Census Bureau's American Community Survey (ACS) data source. The ACS data covers similar topics as compared to the decennial counts and estimates, but ACS data represents a five-year average of data, in this case, the average from 2005 through 2009. The ACS figures are not directly comparable to decennial census counts for the fact that they do not account for certain population groups, such as the homeless, but they are another useful tool for examining population characteristics in a given area.

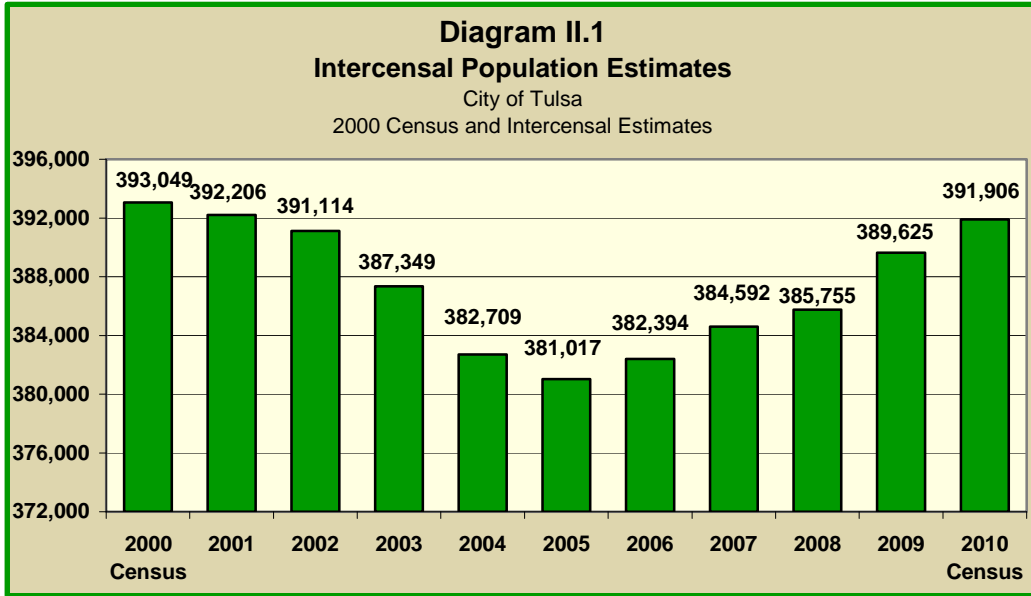
DEMOGRAPHICS

POPULATION DYNAMICS

As shown in Table II.1, at right, the population in the City of Tulsa decreased slightly over the last ten years. From 2000 through 2010, population in the city fell from 393,049 to 391,906 persons. All of the declines in population were seen in the first half of the decade.

Diagram II.1, presented on the following page, illustrates the changes in population that the city has experienced over the last decade. While the population in Tulsa fell by more than 12,000 persons from 2000 through 2005, by 2010 much of the population that had been lost was regained.

Table II.1 Intercensal Population Estimates City of Tulsa U.S. Census Bureau Data		
Year	Population	% Increase
2000 Census	393,049	
2001	392,206	-0.2%
2002	391,114	-0.3%
2003	387,349	-1.0%
2004	382,709	-1.2%
2005	381,017	-0.4%
2006	382,394	0.4%
2007	384,592	0.6%
2008	385,755	0.3%
2009	389,625	1.0%
2010 (Census count)	391,906	0.6%
% Change 00 – 10	-0.3%	.



POPULATION BY AGE

Table II.2, below, presents population data by age for the City of Tulsa. At the time of the 2000 census, most persons comprised the 35 to 54 age group cohort and the 5 to 19 age group cohort, with 111,299 and 80,766 persons, respectively. The smallest groups comprised those aged under 5 and aged 20 to 24.

ACS data on population by age for the City of Tulsa are also presented in Table II.2. As established previously, ACS data represent a five-year data average from 2005 through 2009. During this time, a few age group cohorts showed slight increases in percent of population, such as those under five years of age, those aged 25 to 34 and those aged 55 to 64, which increased by 0.8, 0.5, and 2.3 percent, respectively.

Table II.2
Population by Age
City of Tulsa
U.S. Census Bureau Data

Age	2000 Census		2009 Five-Year ACS	
	Population	% of Total	Population	% of Total
Under 5	28,318	7.2%	30,769	8.0%
5 to 19	80,766	20.5%	73,909	19.2%
20 to 24	31,286	8.0%	30,496	7.9%
25 to 34	58,659	14.9%	59,218	15.4%
35 to 54	111,299	28.3%	100,300	26.1%
55 to 64	32,213	8.2%	40,369	10.5%
64 and Over	50,508	12.9%	49,354	12.8%
Total	393,049	100.0%	384,415	100.0%

POPULATION BY RACE AND ETHNICITY

At the time that the 2000 census was taken, the racial composition of the City of Tulsa was predominantly white; this group comprised 70.1 percent of the total population at 275,488 persons. The next most populous group was black at 15.5 percent or 60,794 persons followed by American Indian at 4.7 percent or 18,551 persons. Asian and Native Hawaiian/Pacific Islander groups accounted for less than 2.0 percent of the population, as shown in Table II.3.

More recent data regarding racial and ethnic populations from the 2010 census count are also presented in Table II.3. These data show that the white population was the only racial group to decrease in population over the decade, and this group fell by more than 30,000 persons and changed from comprising 70.1 percent of the population to only 62.6 percent. Other racial groups showed slight to moderate gains including the black population, which grew by 1,370 persons or 2.2 percent, the American Indian population, which grew by 2,266 or 10.9 percent, and the Asian population, which grew by 1,927 persons or 21.2 percent.

Race	2000 Census		2010 Census,	
	Population	% of Total	Population	% of Total
White	275,488	70.1%	245,309	62.6%
Black	60,794	15.5%	62,164	15.9%
American Indian	18,551	4.7%	20,817	5.3%
Asian	7,150	1.8%	9,077	2.3%
Native Hawaiian/Pacific Islander	202	0.1%	316	0.1%
Other	13,564	3.5%	31,219	8.0%
Two or More Races	17,300	4.4%	23,004	5.9%
Total	393,049	100.0%	391,906	100.0%

Population data by ethnicity are presented in Table II.4 and show that the Hispanic population experienced a significant increase over the last decade. While the 2000 census data showed this ethnic group accounted for 7.2 percent of the population or 28,111 persons, by 2010 this percentage had nearly doubled to 14.1 percent or 55,266 persons.

Census	Hispanic	Not Hispanic	Total
2000 Census			
Population	28,111	364,938	393,049
% of Total	7.2%	92.8%	100.0%
2010 Census			
Population	55,266	336,640	391,906
% of Total	14.1%	85.9%	100.0%

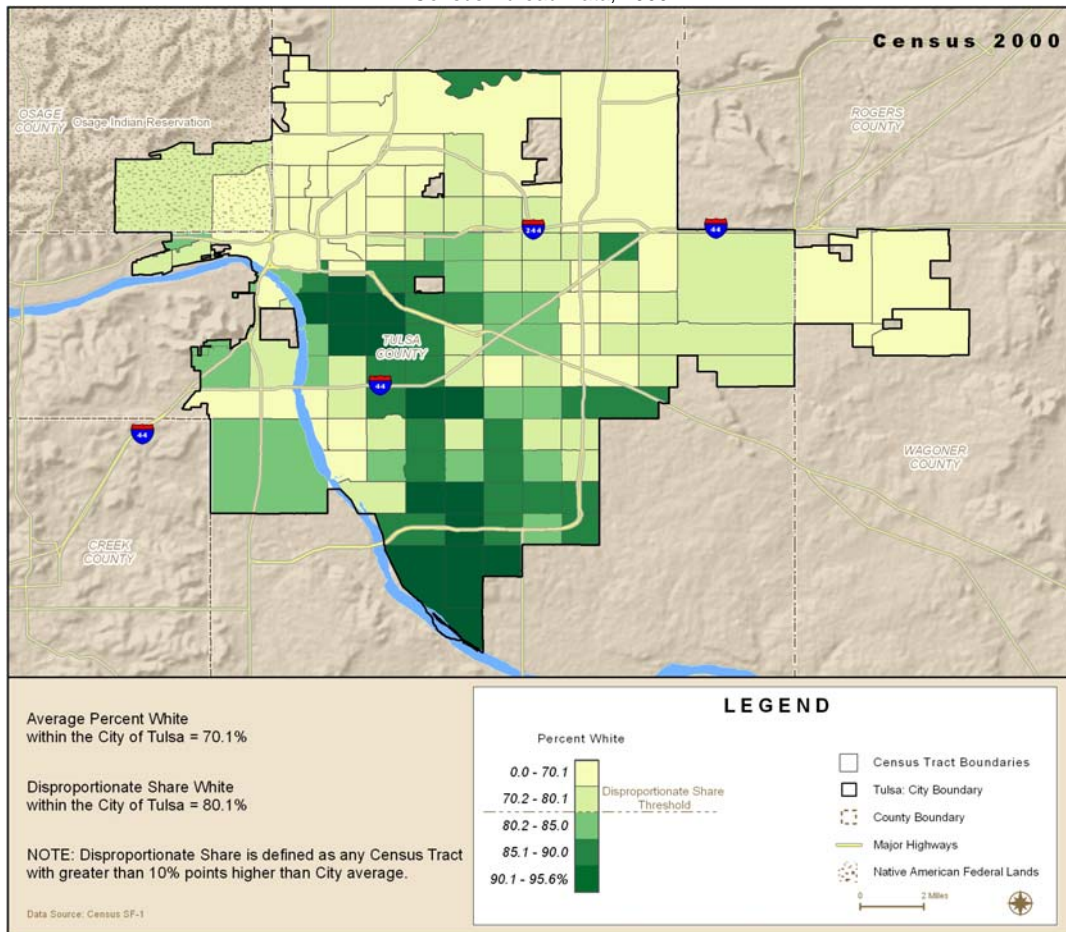
Historical Context

Historically, the racial makeup of the city was affected by the Tulsa Race Riots of 1921. Considered by some as the worst race riots in U.S. history, the 1921 riots were a result of high tension between white and black populations in Tulsa. When the tension came to a breaking point in May 1921, the black Greenwood District, located in the north part of the city, was left decimated. More than 300 people were killed and more than 1,200 homes were destroyed. More than a decade later, work was still being done to restore the life of this community.

Today, the geographic distribution of racial and ethnic minorities varies throughout the city. HUD defines a population as having a disproportionate share when the portion of that population is more than 10 percentage points higher than the jurisdiction average. For example, the citywide white population in Tulsa in 2000 was 70.1 percent. Therefore, any area that showed a white population higher than 80.1 percent displayed a disproportionate share of this population. This analysis of racial distribution was conducted by calculating race as the percentage share of total population and then plotting the data on a geographic map of census tracts in Tulsa. For the sake of comparison, maps were produced for each racial and ethnic group based on both 2000 and 2010 data in order to examine how the concentrations of these populations have changed over time.

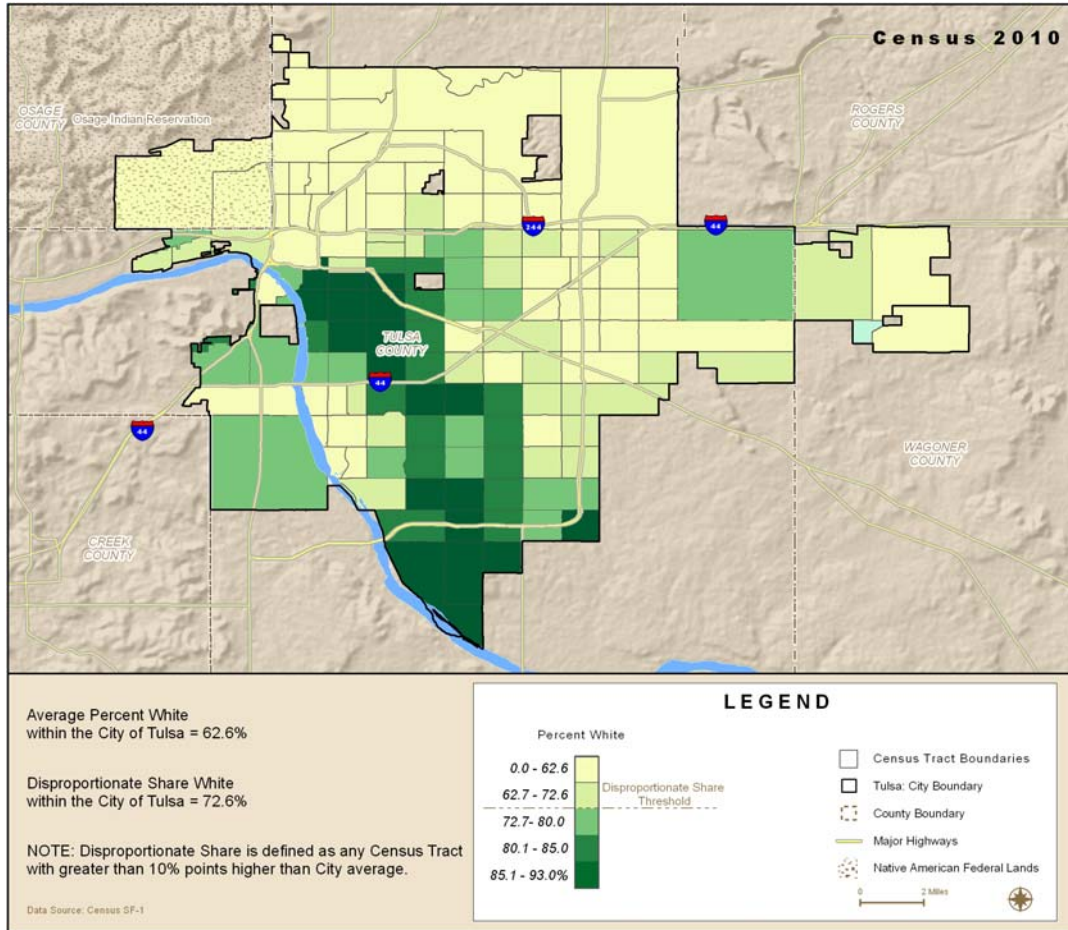
Map II.1, below, shows the concentration of the white population in the city by census tract at the time of the 2000 census. The white population at that time was primarily concentrated in South Tulsa. Disproportionate shares of the population, displayed in the darkest shade of green, were prominent.

Map II.1
Percent White Population by Census Tract
 City of Tulsa
 Census Bureau Data, 2000



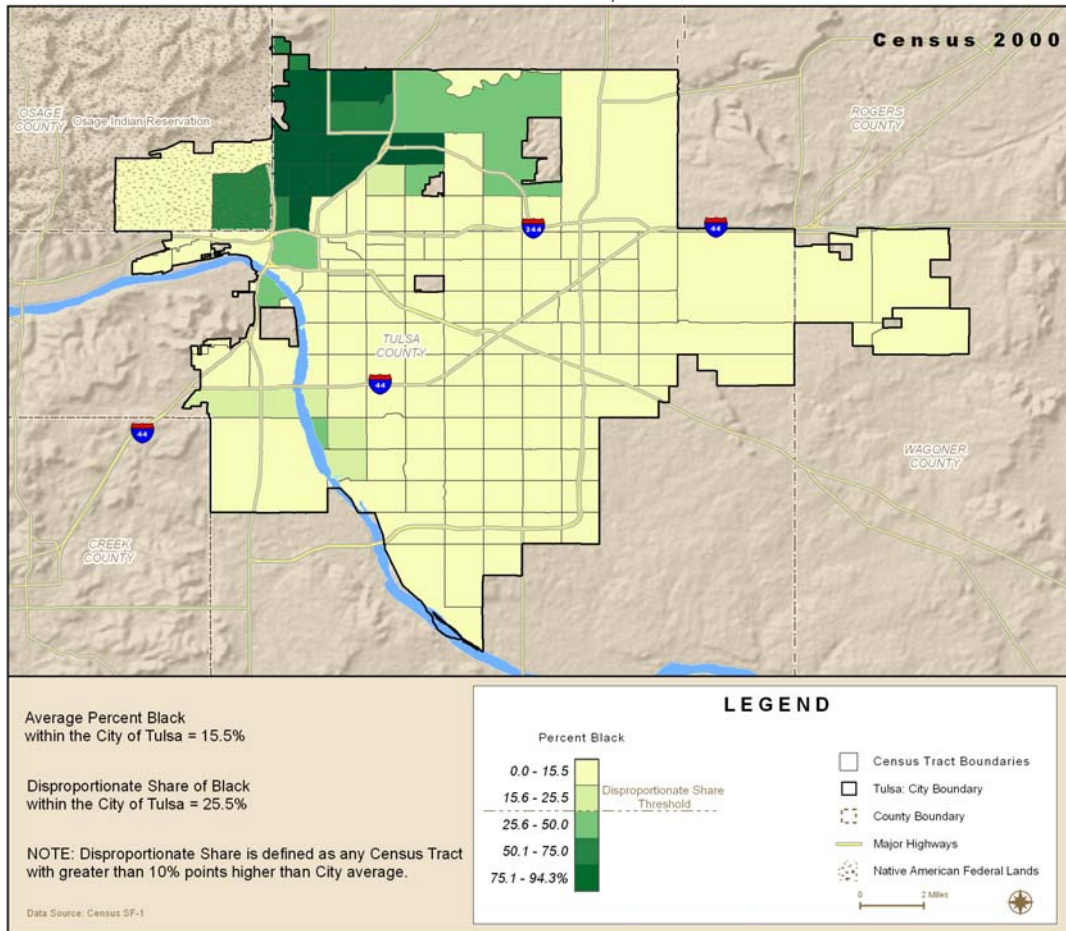
Map II.2, below, shows that the white population became increasingly concentrated in certain parts of the city in the period between 2000 and 2010 and that these concentrations were still located primarily in the southern half of Tulsa.

Map II.2
Percent White Population by Census Tract
 City of Tulsa
 Census Bureau Data, 2010



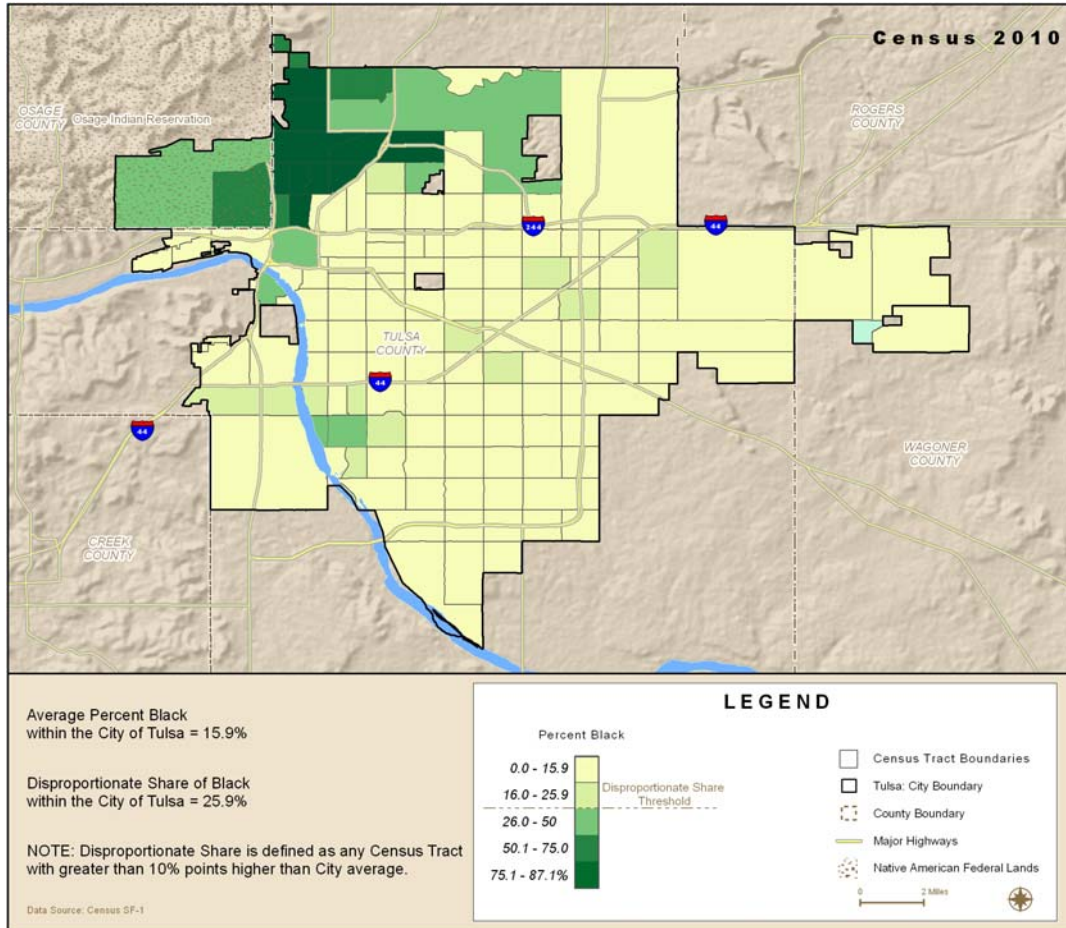
The concentration of the black population in the City of Tulsa at the time of the 2000 census is presented below in Map II.3. In 2000, the black population was concentrated in the northwest part of the city. Several tracts displayed a concentration of this population above the disproportionate share threshold of 25.5 percent and many census tracts demonstrated an extreme concentration of this population as high as 94.3 percent.

Map II.3
Percent Black Population by Census Tract
 City of Tulsa
 Census Bureau Data, 2000



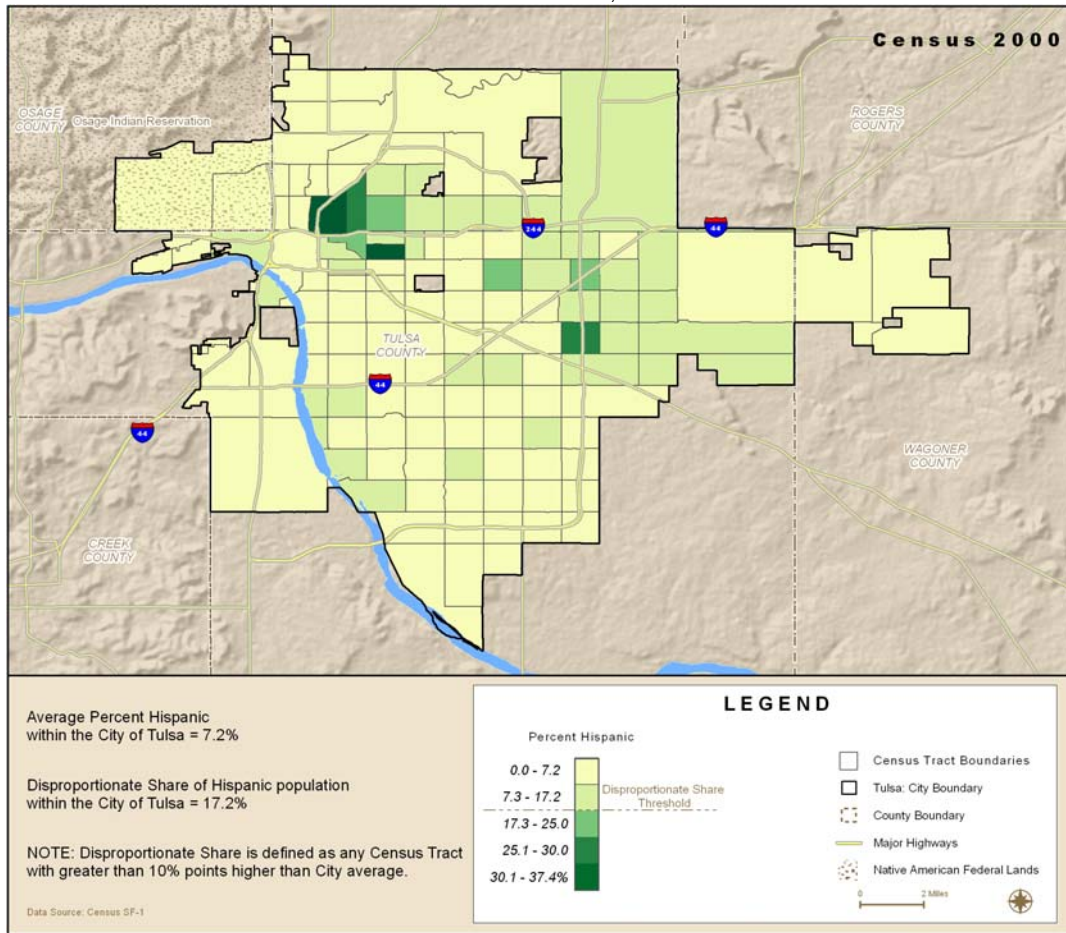
By 2010, a few additional census tracts showed increased concentrations of the black population in the city, as shown below in Map II.4. While this population remained concentrated in the northwest part of Tulsa, additional census tracts in the city showed increased concentration in central Tulsa, although they were generally below the disproportionate share threshold. However, the most concentrated census tracts actually showed a decrease in share from 94.3 percent in 2000 to 87.1 percent in 2010.

Map II.4
Percent Black Population by Census Tract
 City of Tulsa
 Census Bureau Data, 2010



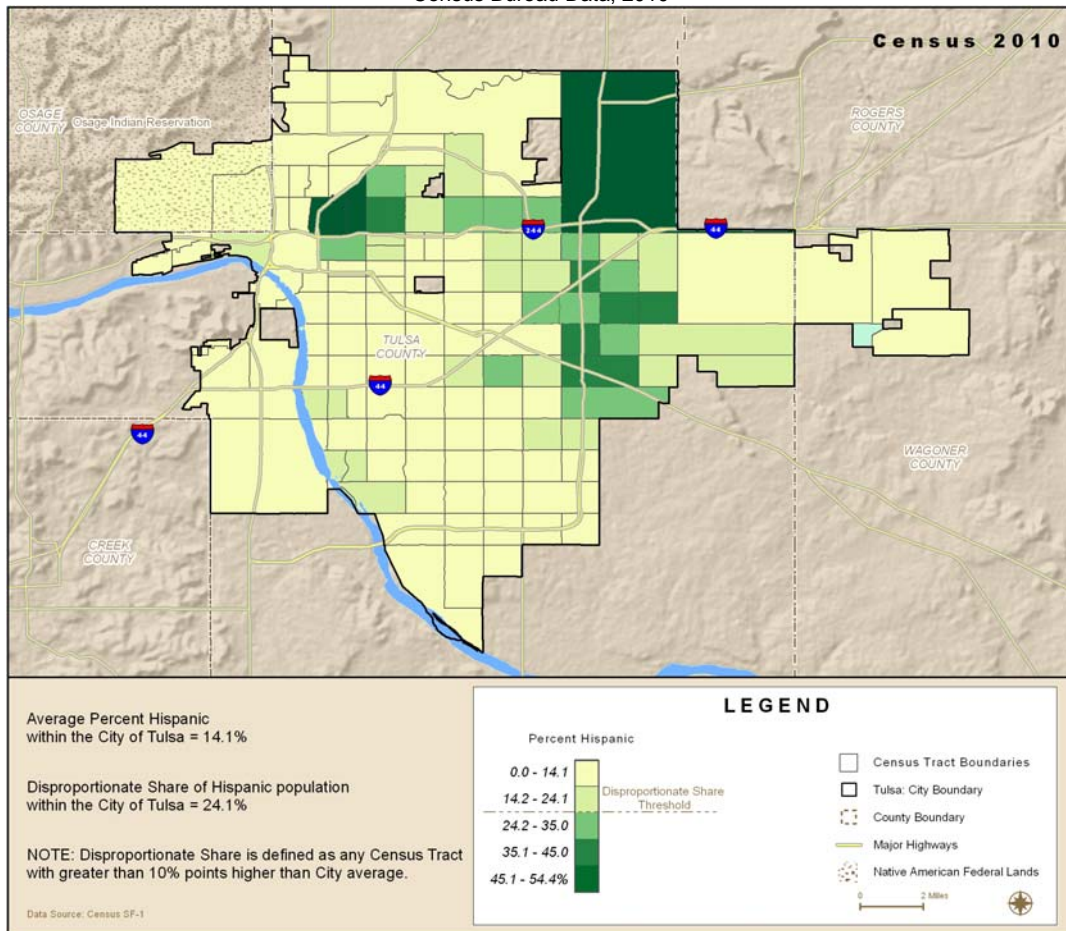
In 2000, the Hispanic ethnic population in the city was found to be concentrated in only a few census tracts in the central area of Tulsa. Eight tracts showed a disproportionate share of the Hispanic population or areas where the population was found to be greater than 17.2 percent Hispanic, as shown below in Map II.5.

Map II.5
Percent Hispanic Population by Census Tract
 City of Tulsa
 Census Bureau Data, 2000



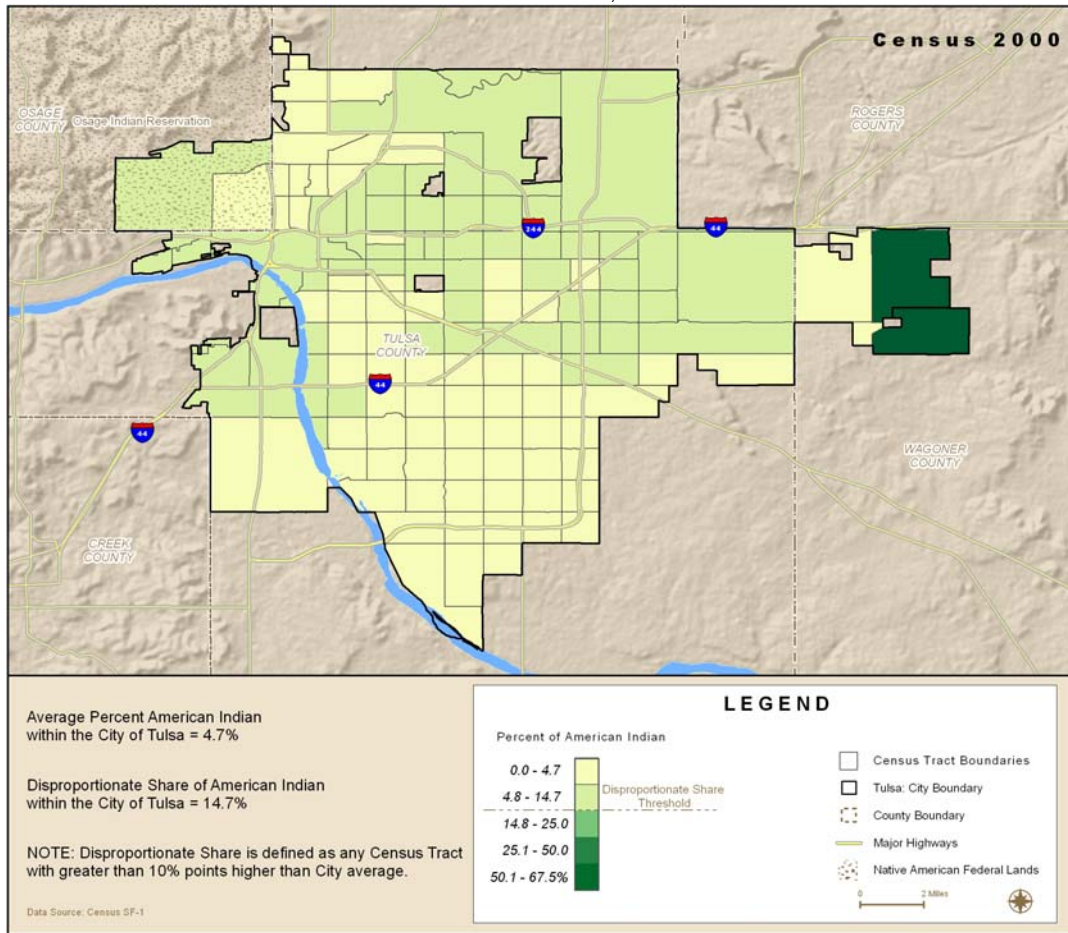
Map II.6 shows the Hispanic population in Tulsa has experienced significant shifts in population concentration. In 2010, the Hispanic population had moved eastward and was disproportionately concentrated, or concentrated by more than 24.1 percent, in nearly 25 census tracts in the city. The three tracts shown in the darkest shade of green represent areas where more than 50.0 percent of the population was Hispanic.

Map II.6
Percent Hispanic Population by Census Tract
 City of Tulsa
 Census Bureau Data, 2010



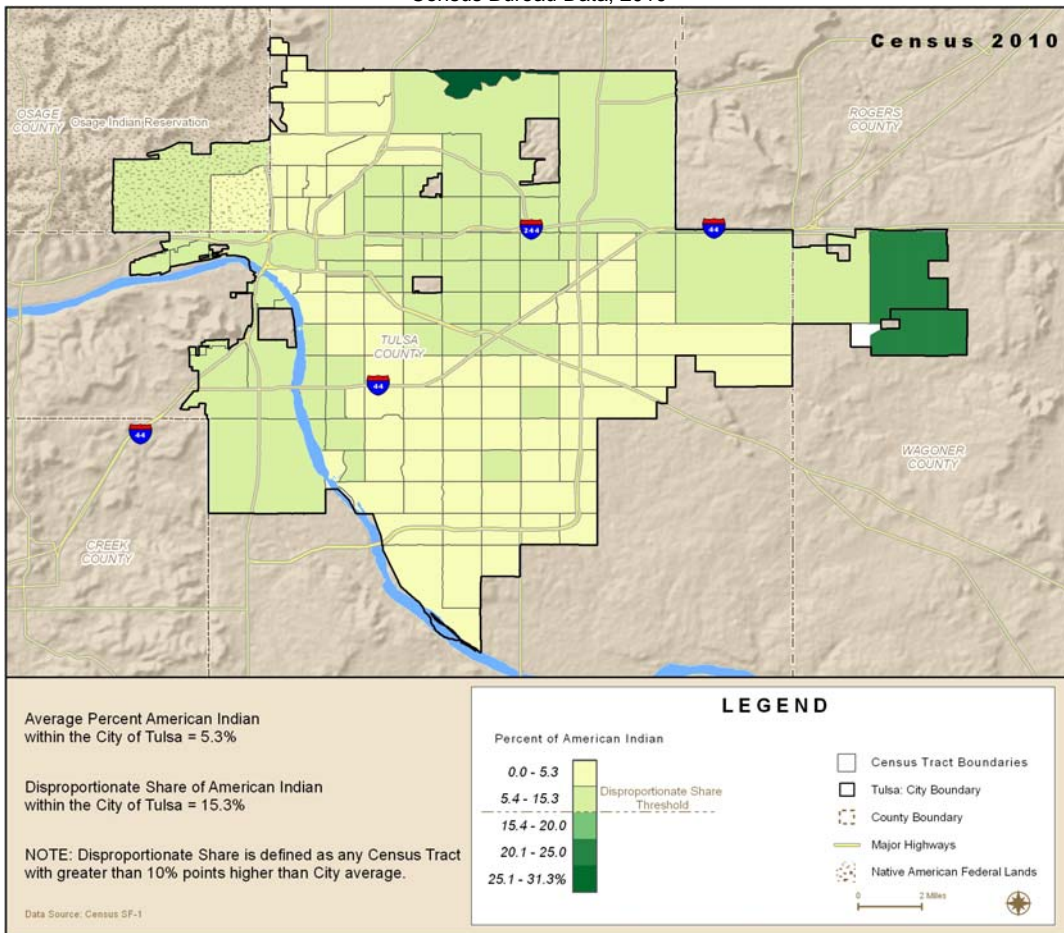
The concentration of the American Indian population in the city at the time of the 2000 census is presented below in Map II.7. Two census tracts showed disproportionate shares of this population, beyond 14.7 percent, and both were actually comprised of more than 50.0 percent American Indian population at that time.

Map II.7
Percent American Indian Population by Census Tract
 City of Tulsa
 Census Bureau Data, 2000



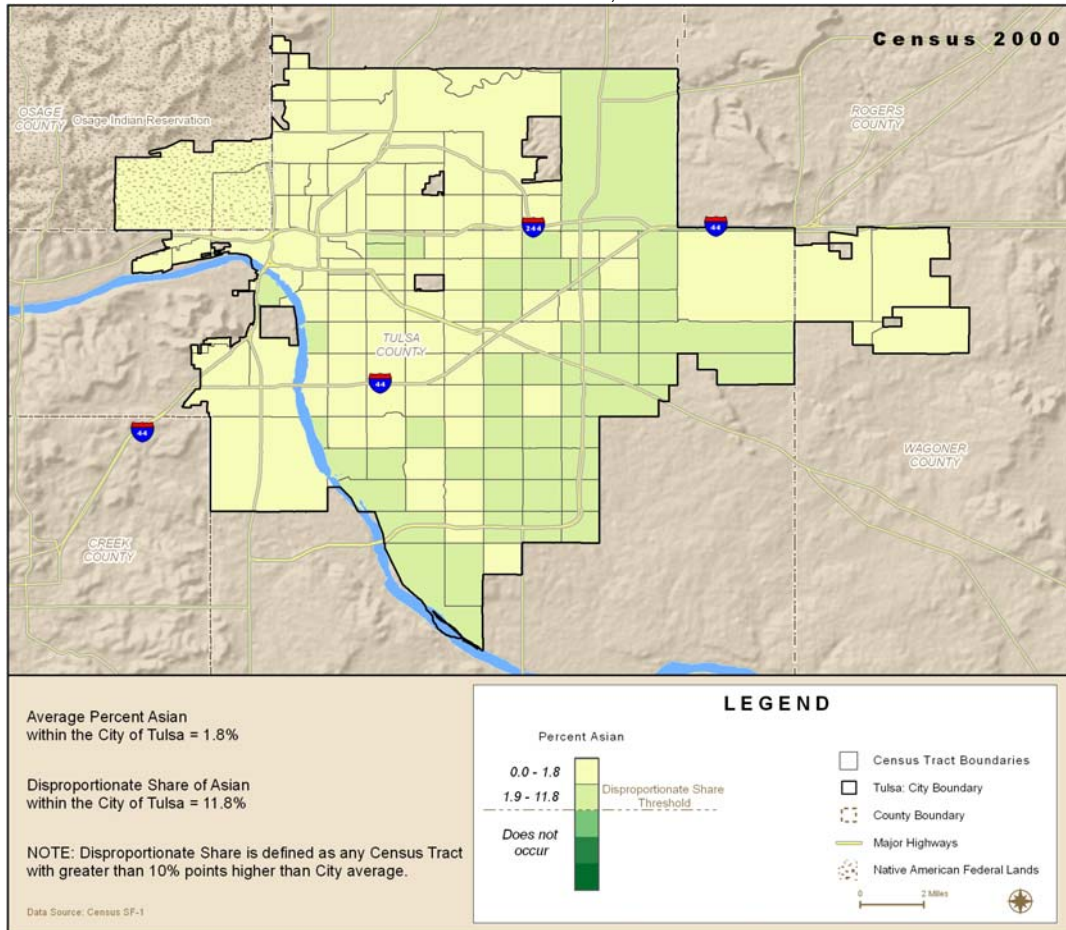
Map II.8, below, shows the American Indian population in the City of Tulsa as of the 2010 census. Three census tracts showed a disproportionate share greater than 15.3 percent at that time. Interestingly, the American Indian population became less concentrated in the two far eastern census tracts in the city but became highly concentrated in one northern census tract in Tulsa.

Map II.8
Percent American Indian Population by Census Tract
 City of Tulsa
 Census Bureau Data, 2010



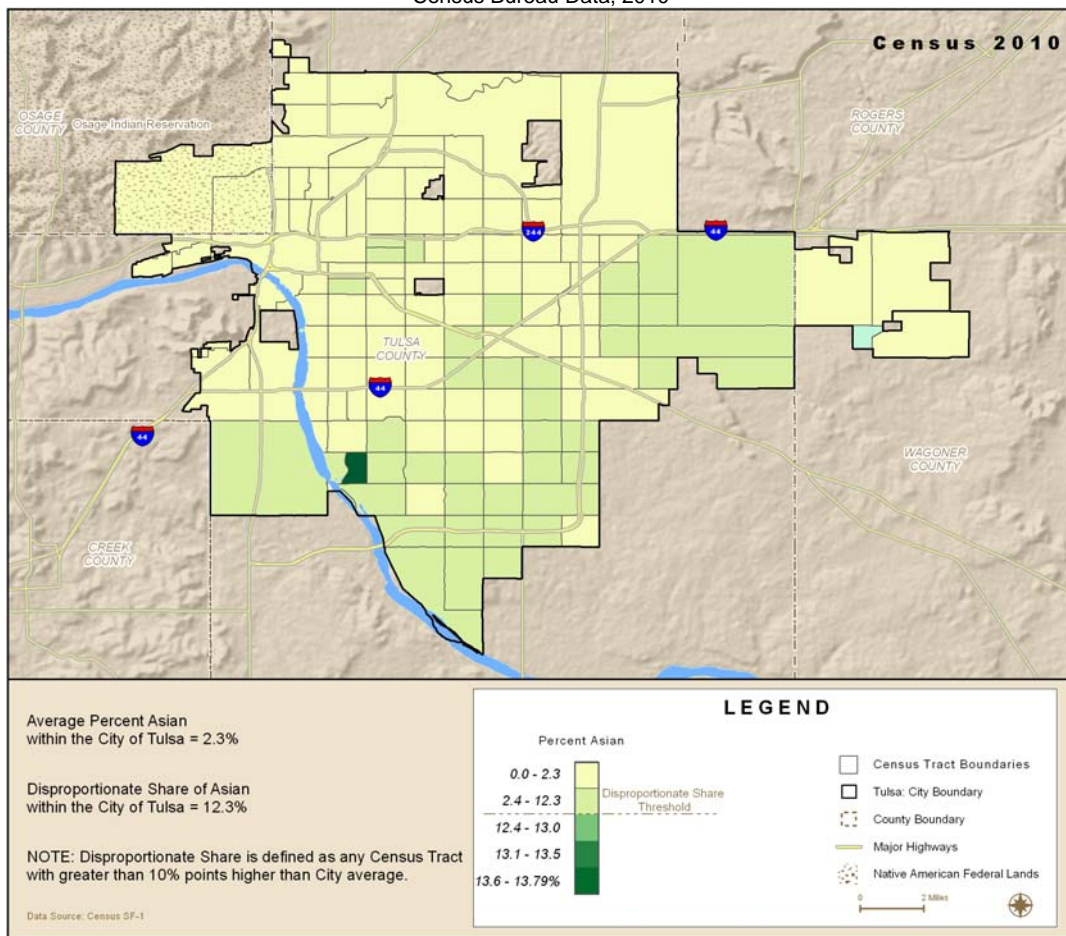
In 2000, the Asian population was shown to be spread fairly evenly throughout Tulsa, as shown below in Map II.9. No disproportionate shares of the population, greater than 11.8 percent, were identified.

Map II.9
Percent Asian Population by Census Tract
 City of Tulsa
 Census Bureau Data, 2000



Map II.10, below, shows more recent information regarding the concentration of the Asian population in Tulsa. In 2010, the Asian population was shown to be only slightly more concentrated in some parts of the city, specifically in the southwestern portion where one tract showed a concentration of nearly 14.0 percent.

Map II.10
Percent Asian Population by Census Tract
 City of Tulsa
 Census Bureau Data, 2010



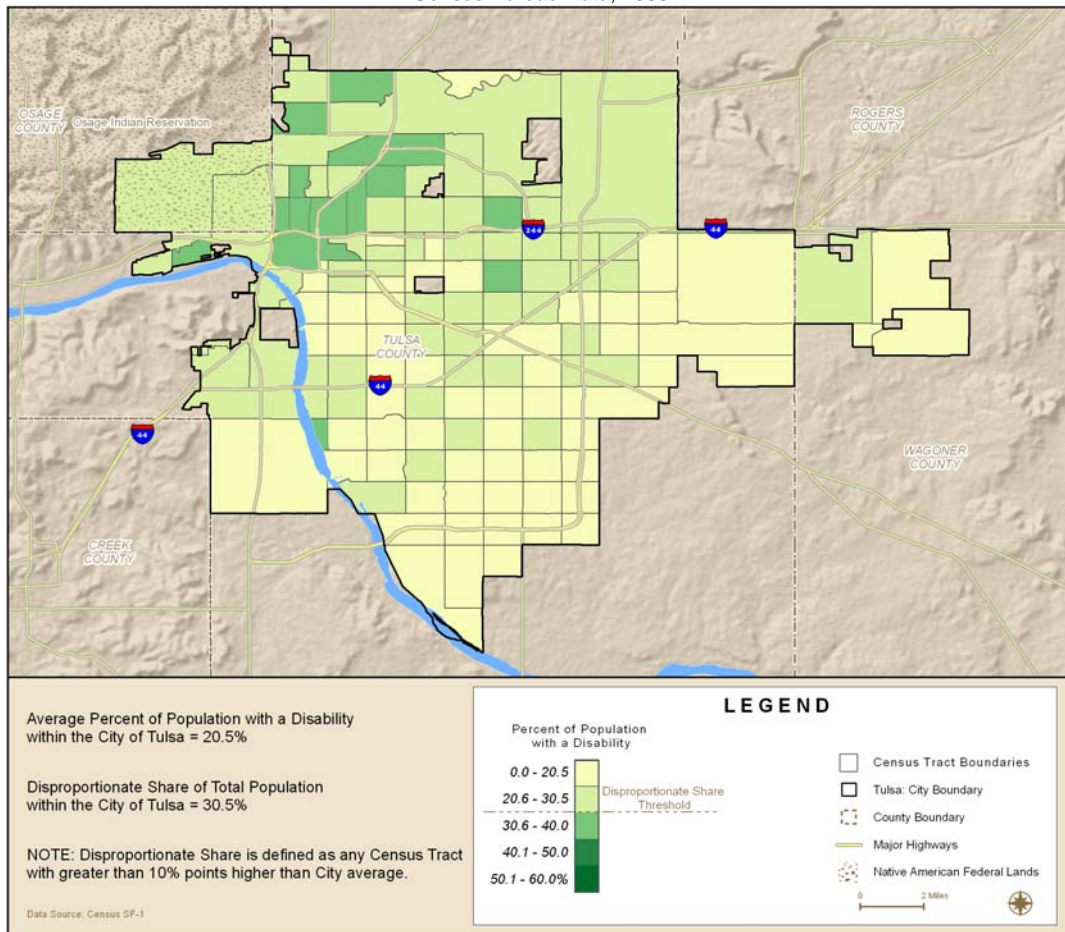
DISABILITY STATUS

Disability is defined by the Census Bureau as a lasting physical, mental or emotional condition that makes it difficult for a person to conduct daily activities of living or impedes them from being able to go outside the home alone or to work. For all persons aged 5 years or older, the City of Tulsa had a disability rate of 20.5 percent, which was slightly higher than the 19.0 percent national rate at that time. This disability rate represented 73,839 persons living with a disability in the city. These data are displayed in Table II.5, at right.

Age	Total
5 to 15	4,113
16 to 64	49,830
Over 65	19,896
Total	73,839
Disability Rate	20.5%

Geographic distribution of the disabled population in Tulsa as of the 2000 census is presented below in Map II.11. This map shows that the disabled population was concentrated as high as 40.0 percent in areas in the central northwestern part of the city.

**Map II.11
Disabled Population by Census Tract**
City of Tulsa
Census Bureau Data, 2000



ECONOMICS

LABOR FORCE AND EMPLOYMENT

Data regarding the labor force, defined as the total number of persons working or looking for work, and employment, or the number of persons working, are presented below in Diagram II.2. As shown, labor force and employment figures have fluctuated throughout the past two decades but have essentially mimicked each other. However, in 2009 employment figures fell markedly while labor force figures were static.

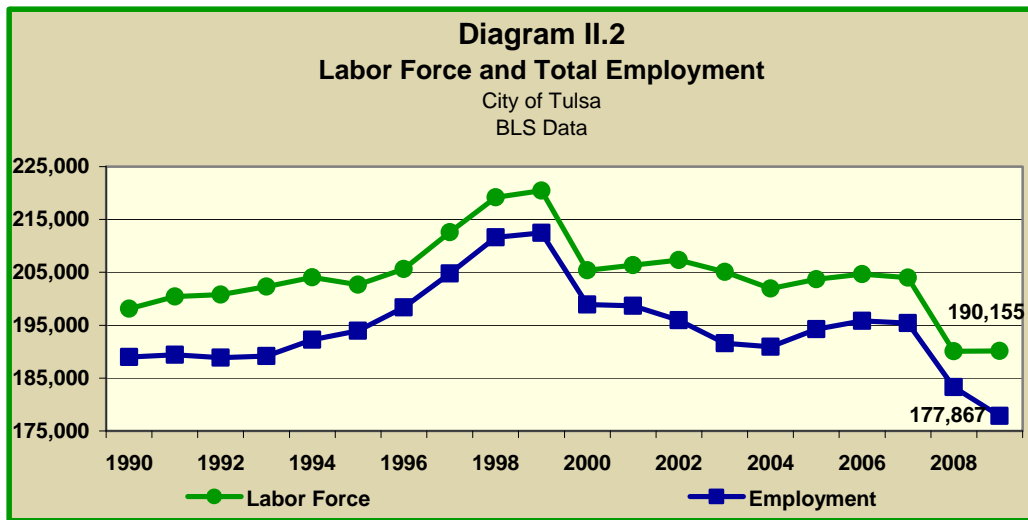
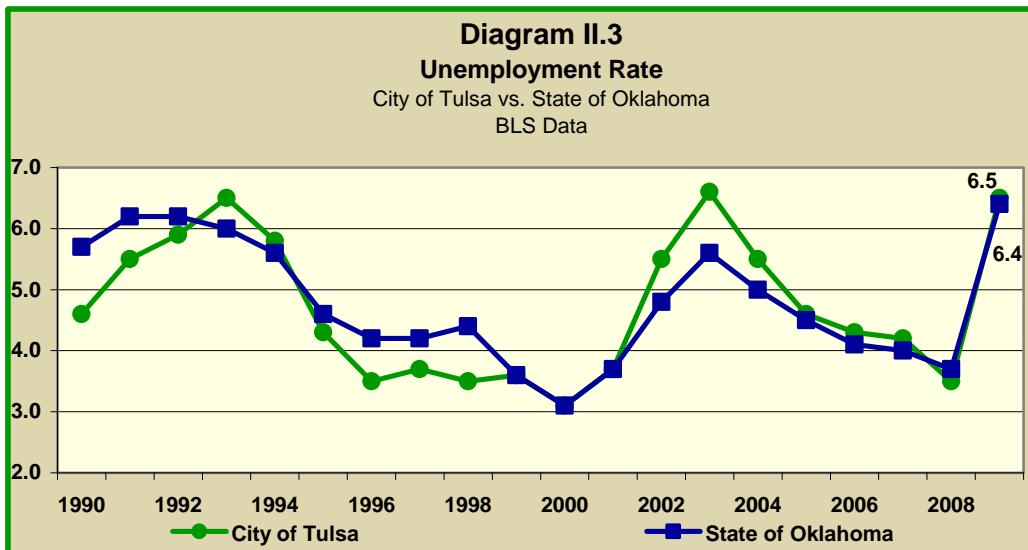
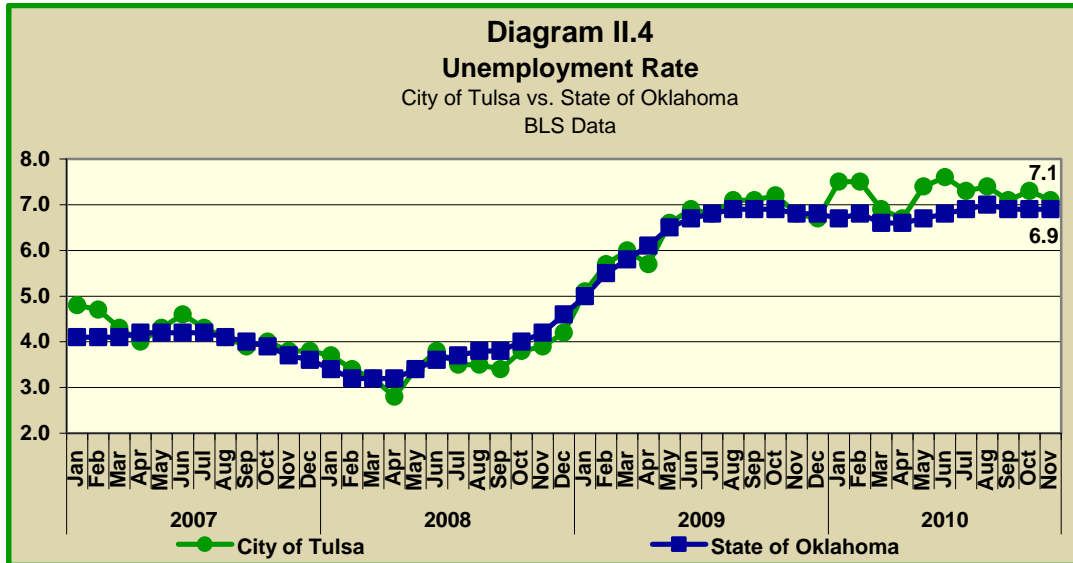


Diagram II.3 presents the unemployment rate in the City of Tulsa as compared to the State of Oklahoma from 1990 through 2009. As a result of the increasing labor force and decreasing employment rate experienced in 2009, the unemployment rate increased dramatically. In 2009, Tulsa's unemployment rate stood at 6.5 percent, and this figure was slightly higher than the state rate.

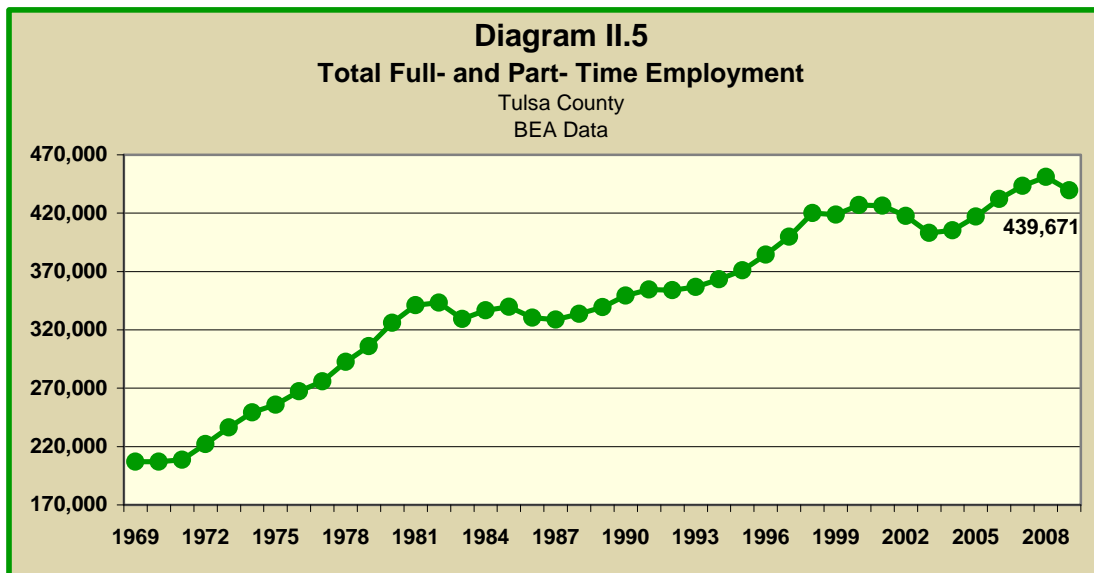


More recent monthly unemployment rate data are presented in Diagram II.4. As shown, the unemployment rate in Tulsa swelled through the middle of 2009 and through 2010 to rates as high as almost 8.0 percent. By November 2010, the unemployment rate in Tulsa was 7.1 percent and was only slightly higher than the statewide rate at that time of 6.9 percent.



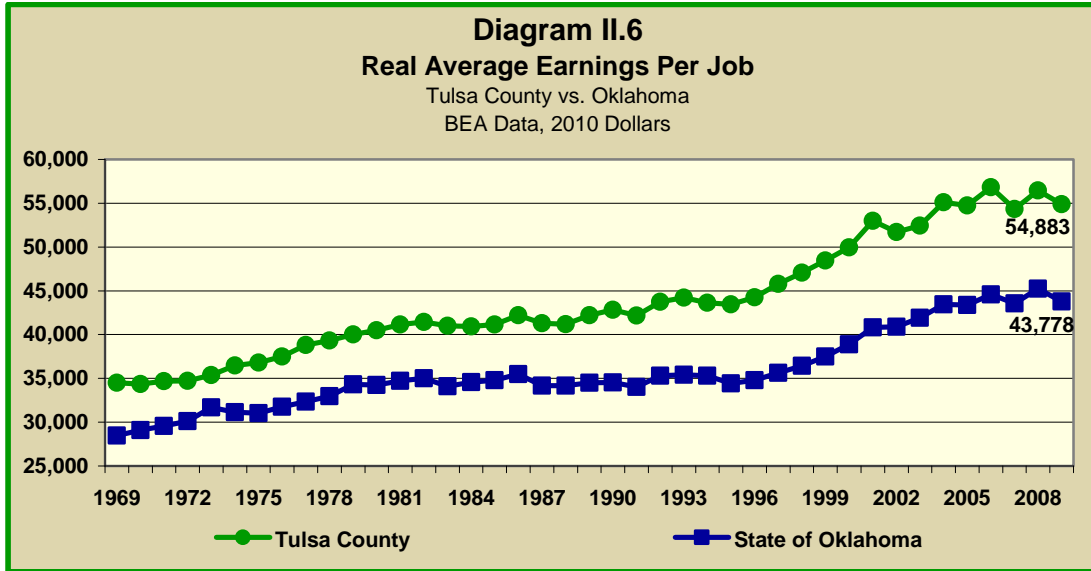
FULL- AND PART-TIME EMPLOYMENT AND EARNINGS

The Bureau of Economic Analysis (BEA) provides an alternate view of employment: a count of both full- and part-time jobs. Thus, a person working more than one job can be counted more than once. As shown in Diagram II.5, below, the total number of full- and part-time jobs in Tulsa County increased substantially from 1969 through 2009 by more than 230,000 jobs.⁴

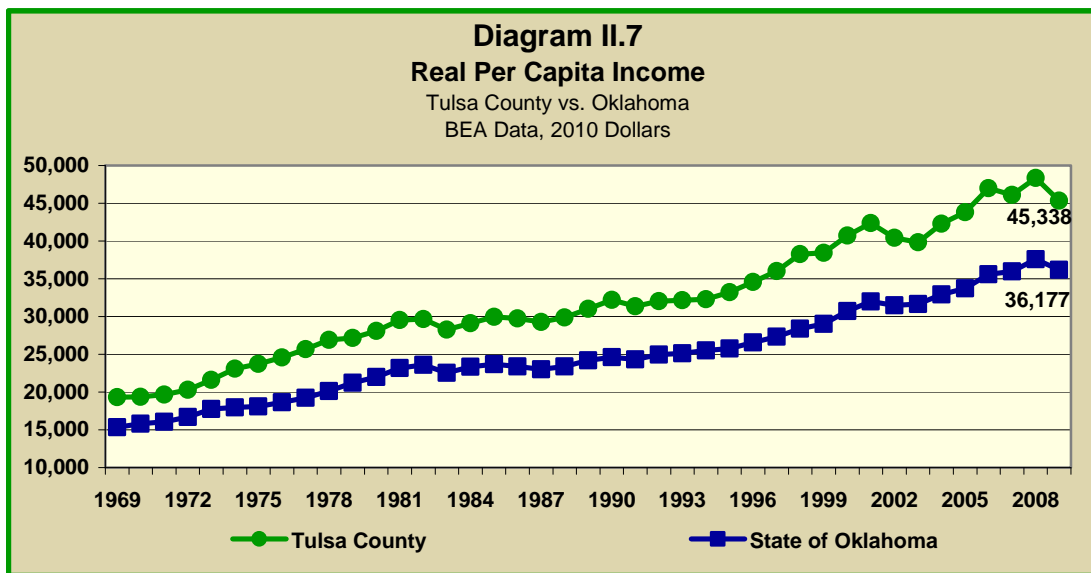


⁴ Data are, in part, from administrative records, and the most current BEA data available were through 2009.

When total earnings from employment is divided by the number of jobs and then deflated to remove the effects of inflation, average real earnings per job is determined. Diagram II.6 shows that average earnings per job in Tulsa County remained above the state level for the time period of 1969 through 2009 and increased from just under \$35,000 to over \$54,000.



Another gauge of economic health involves comparing the total of all forms of income: wages earned, transfer payments, and property income, such as dividends, interest and rents. When these data are added together and divided by population, per capita income is determined. Diagram II.7 compares real per capita income in Tulsa to the State of Oklahoma from 1969 through 2009. This figure shows that per capita income grew relatively steadily throughout the time period with only a few bubbles in the early 1980s and early 2000s. Per capita income in 2009 was nearly \$10,000 above the state figure at \$45,338 versus \$36,177.



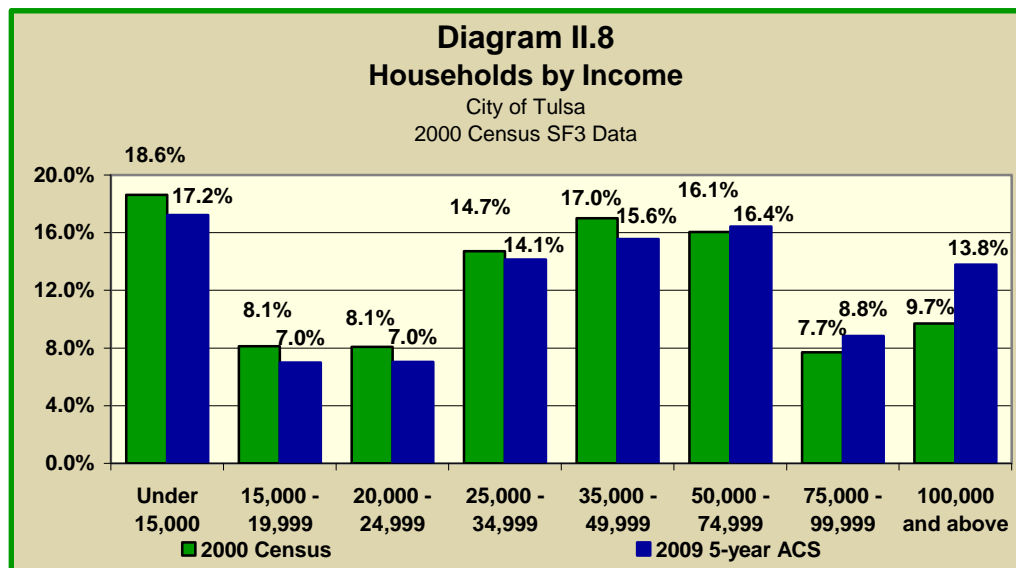
HOUSEHOLD AND FAMILY INCOME

Table II.6 presents the number of households in the City of Tulsa by income range as counted in the 2000 census. More than 30,000 households were counted as having incomes under \$15,000 and an additional 26,886 households had incomes between \$15,000 and \$24,999.

ACS data show that the percentage of households with incomes under \$50,000 decreased while the percentage of households with incomes over \$50,000 increased. This finding suggests that incomes in the city are improving.

Table II.6				
Households by Income				
City of Tulsa				
U.S. Census Bureau Data				
Income	2000 Census		2009 Five-Year ACS	
	Households	% of Total	Households	% of Total
Under 15,000	30,893	18.6%	28,243	17.2%
15,000 - 19,999	13,491	8.1%	11,470	7.0%
20,000 - 24,999	13,395	8.1%	11,514	7.0%
25,000 - 34,999	24,407	14.7%	23,165	14.1%
35,000 - 49,999	28,203	17.0%	25,496	15.6%
50,000 - 74,999	26,638	16.1%	26,933	16.4%
75,000 - 99,999	12,766	7.7%	14,467	8.8%
100,000 and above	16,088	9.7%	22,589	13.8%
Total	165,881	100.0%	163,877	100.0%

Diagram II.8 compares 2000 census and 2005 through 2009 ACS data and shows that very low income and middle income households comprised the majority of households in the city.



POVERTY

The Census Bureau uses a set of income thresholds that vary by family size and composition to determine poverty status. If a family's total income is less than the threshold for their size, then that family, and every individual in it, is considered poor. The poverty thresholds do not vary geographically, but they are updated annually for inflation using the Consumer Price Index. The official poverty definition counts income before taxes and does not include capital gains and non-cash benefits, such as public housing, Medicaid and food stamps. Poverty is not defined for people in military barracks, institutional group quarters or for unrelated individuals under age 15, such as foster children.

In Tulsa, the poverty rate in 2000 was 14.1 percent with 54,121 persons considered to be living in poverty, as noted in Table II.7. This rate was slightly higher than the national average at that time of 12.4 percent. Further, the city had 7,911 children under the age of five and 3,968 persons aged 65 or older living in poverty at that time.

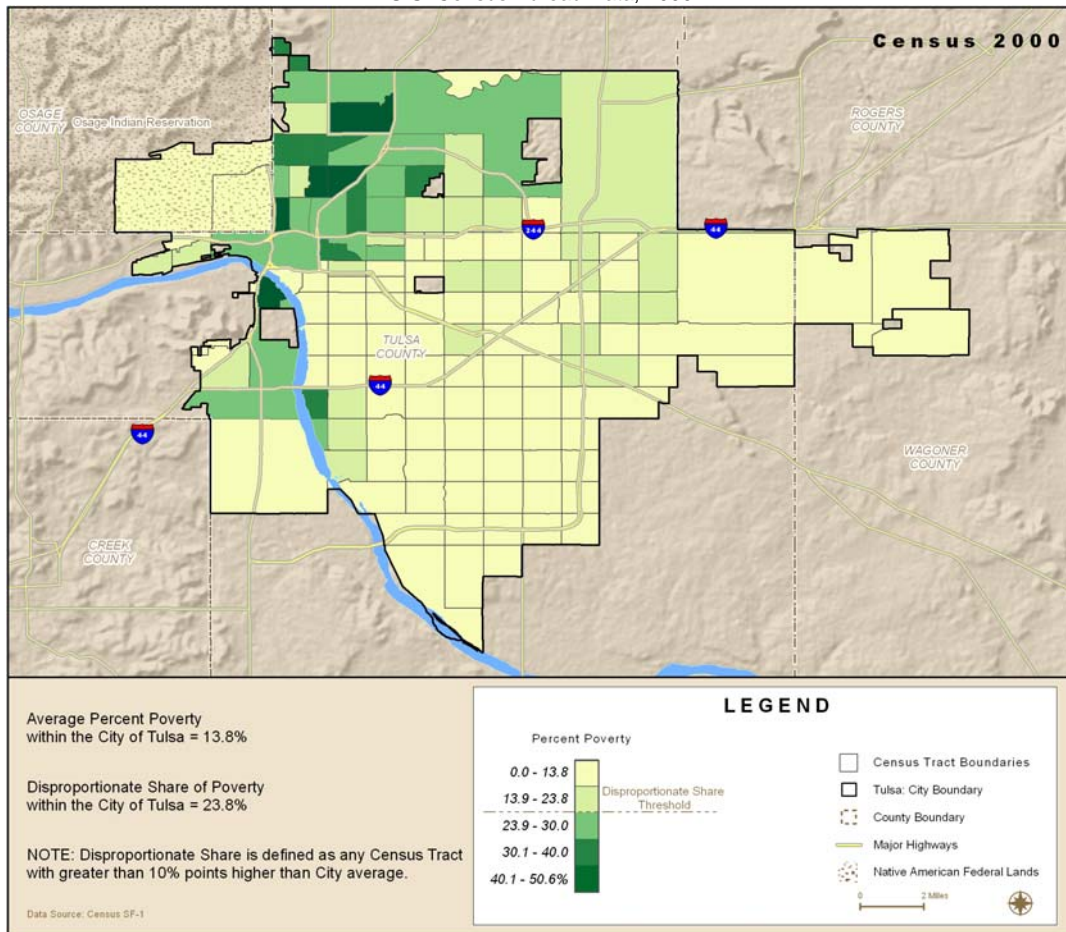
More recent ACS data show that the percentage of persons living in poverty increased in Tulsa to 19.0 percent and represented a greater portion of children under the age of five.

Table II.7				
Poverty by Age				
City of Tulsa				
U.S. Census Bureau Data				
Age	2000 Census		2009 Five-Year ACS	
	Population	% of Total	Population	% of Total
5 and Below	7,911	14.6%	12,494	17.6%
6 to 18	11,990	22.2%	15,403	21.7%
18 to 64	30,252	55.9%	38,879	54.7%
65 and Older	3,968	7.3%	4,265	6.0%
Total	54,121	100.0%	71,041	100.0%
Poverty Rate	14.1%	.	19.0%	.

Poverty was not spread evenly throughout the City of Tulsa, as some census tracts had higher concentrations of poverty than others. Map II.12 presents the 2000 poverty rate for all census tracts in the city. These data have been segmented to illustrate the census tracts that had a disproportionate share of persons living in poverty or areas where more than 24.1 percent of residents were poor. As shown, most of the census tracts with a disproportionate share of the population living in poverty were located in the northern half of the city, specifically on the northwestern side. Some census tracts in these areas showed a poverty rate in excess of 50.0 percent.

Map II.12
Percent of Population in Poverty by Census Tract

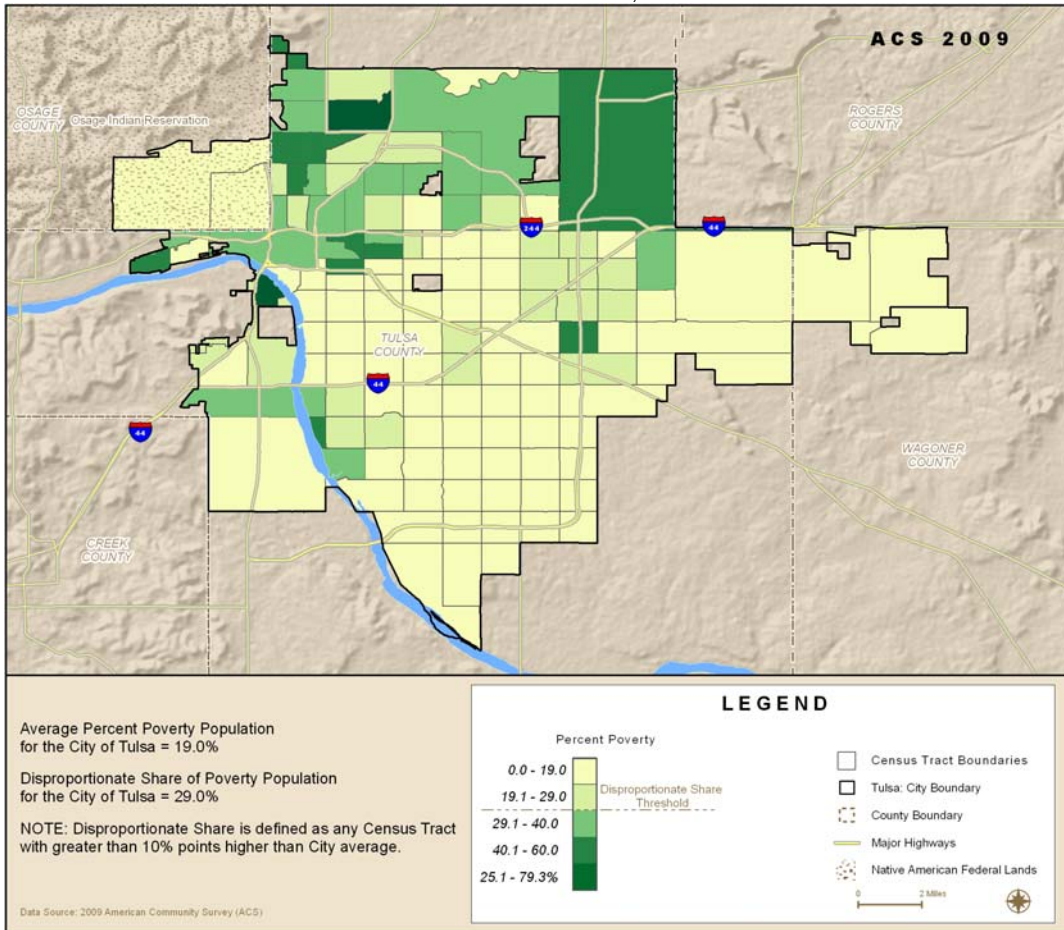
City of Tulsa
 U.S. Census Bureau Data, 2000



Changes in the concentration of the population living in poverty can be seen by comparing the 2000 poverty map presented on the previous page to a map representing more recent poverty data for the city, shown below. Map II.13, below, presents poverty data for Tulsa derived from 2005 through 2009 ACS data averages. This map shows that the concentration of poverty continued to be concentrated in North Tulsa but shifted somewhat eastward to a high of 60.0 percent in some northeastern tracts. Additionally, while the most extreme concentration of poverty in 2000 was slightly over 50.0 percent, in 2010 the most concentrated areas showed a rate of nearly 80.0 percent.

Map II.13
Percent of Population in Poverty by Census Tract
 City of Tulsa

U.S. Census Bureau Data, 2009

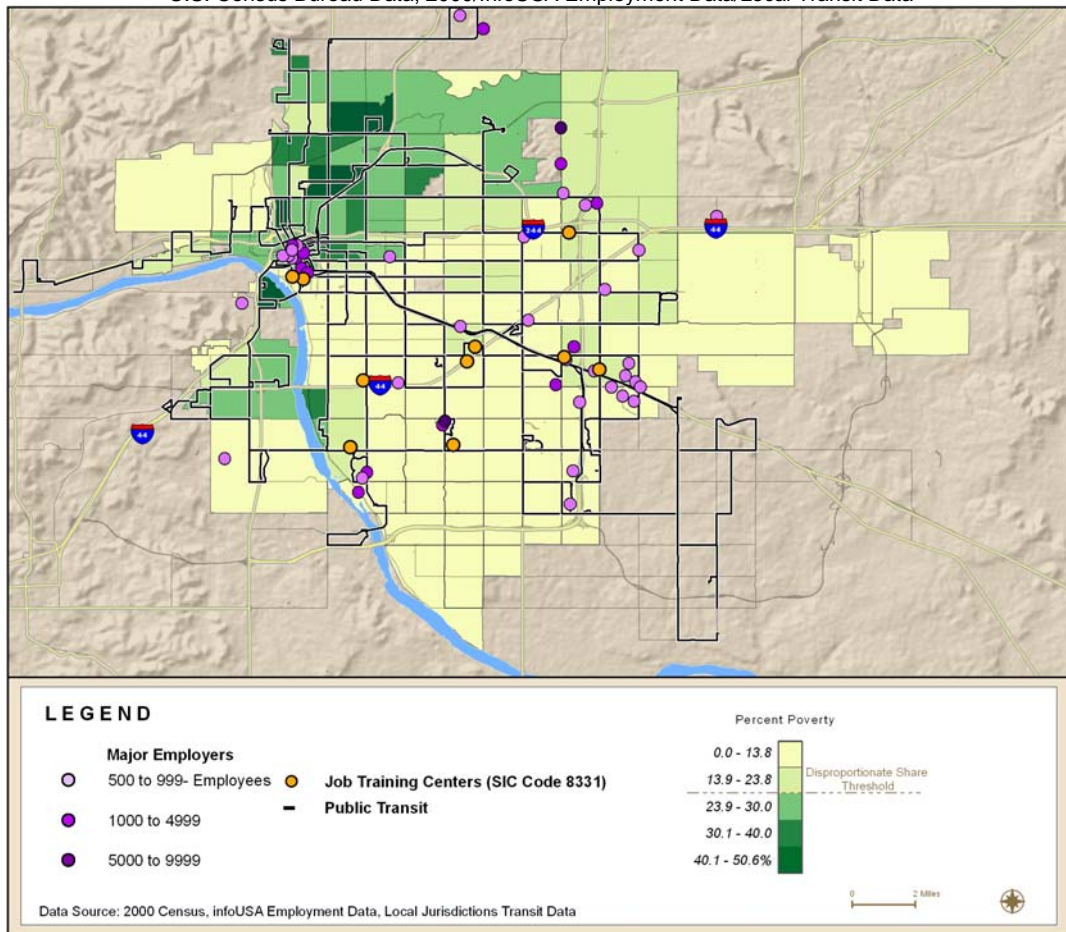


TRANSIT AND EMPLOYMENT LOCATIONS

Map II.14 presents the layout of the transit system and the location of job training centers or employers in the city. The transit system, shown in black, is centered around the downtown hub of Tulsa with numerous spokes extending to the outlying areas. Analysis of the transit layout showed that although some areas on the city border lack extensive access to the transit system. Job training centers, represented by an orange dot, are located primarily near downtown and in the southern central part of the city; all training centers are within 0.25 miles of bus routes. The remaining dots represent employers in the city. Again, these businesses were mostly located in the southern central part of the city, and 47 of the 60 major employers were located within a quarter mile of bus routes.

However, when the concentration of poverty is factored into the location of these entities, a different picture develops. In Tulsa, zero of 12 job training centers and only 24 of 60 major employers are located within census tracts with disproportionate shares of poverty.

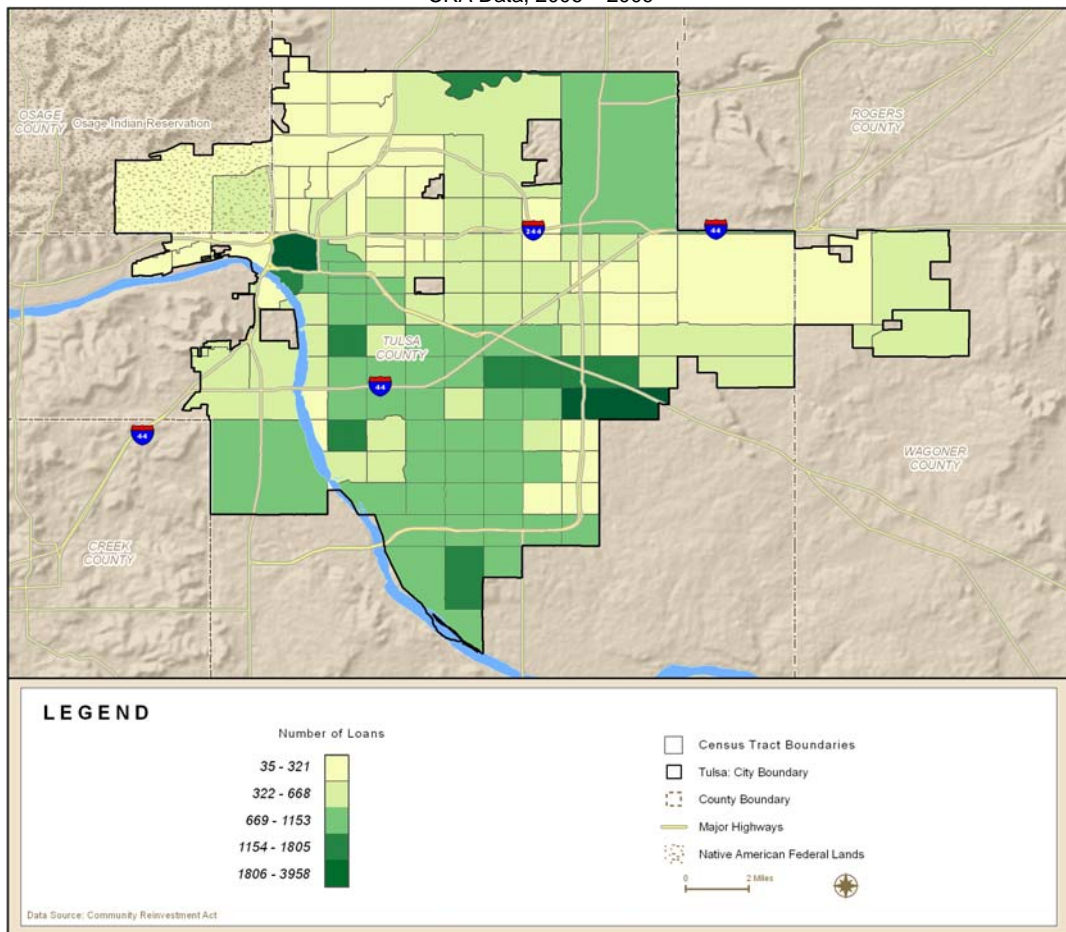
Map II.14
Location of Transportation and Employment Services
 City of Tulsa
 U.S. Census Bureau Data, 2000/InfoUSA Employment Data/Local Transit Data



COMMUNITY INVESTMENT

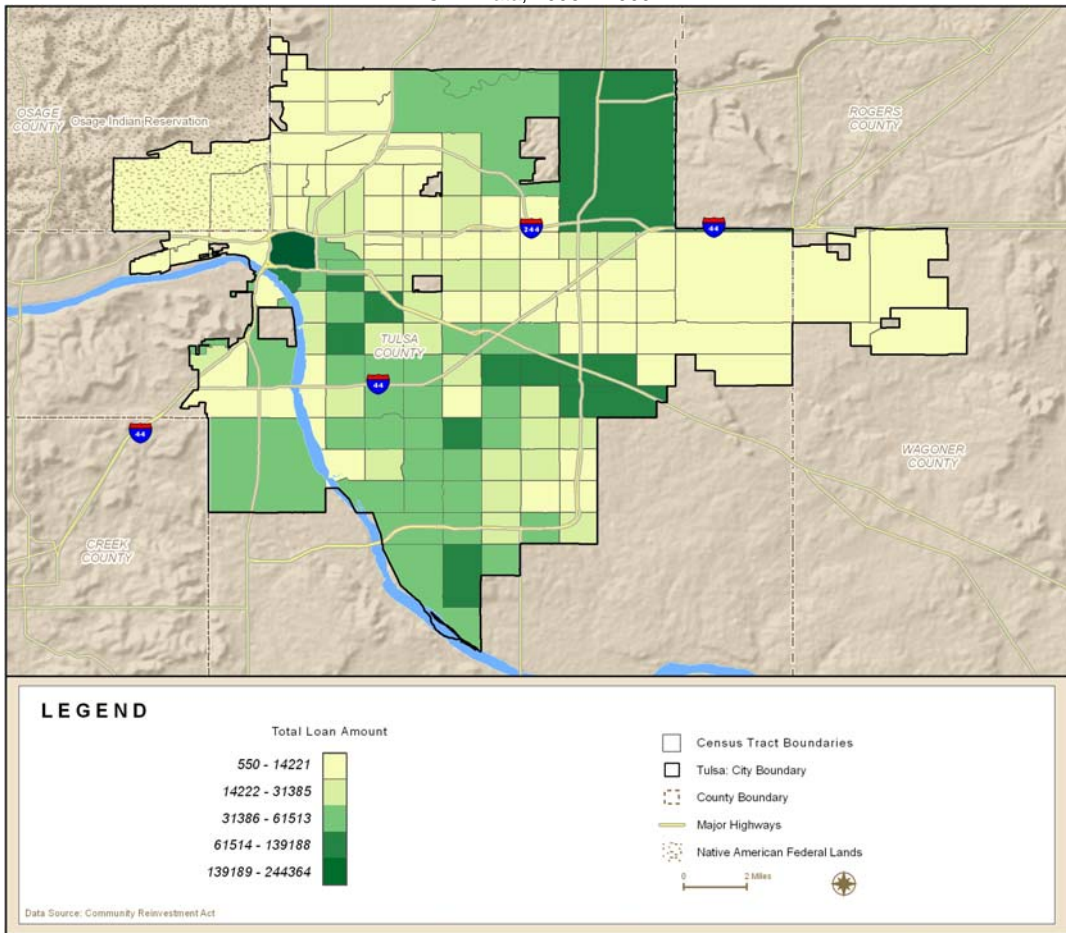
Measurement of economic aid to businesses in the city can also be measured through Community Reinvestment Act (CRA) data. The CRA was enacted in 1977 and was intended to encourage lending institutions to help meet the credit needs of the communities in which they operate, including low- and moderate-income neighborhoods. Map II.15 illustrates the number of CRA loans issued to businesses in the City of Tulsa from 2006 through 2009. This map clearly shows that the majority of the loans issued through the CRA were directed toward the southern part of the city. Fewer loans were issued to the northern portion and eastern part of Tulsa.

Map II.15
Number of Community Reinvestment Act Loans
City of Tulsa
CRA Data, 2006 – 2009



Map II.16, below, visually demonstrates the dispersal of CRA business loan funding throughout the City of Tulsa from 2006 through 2009 by loan amount. Similar to the previous map, the areas receiving the highest levels of loan funding were primarily located in the south part of Tulsa.

Map II.16
Amount of Community Reinvestment Act Loans
 City of Tulsa
 CRA Data, 2006 – 2009

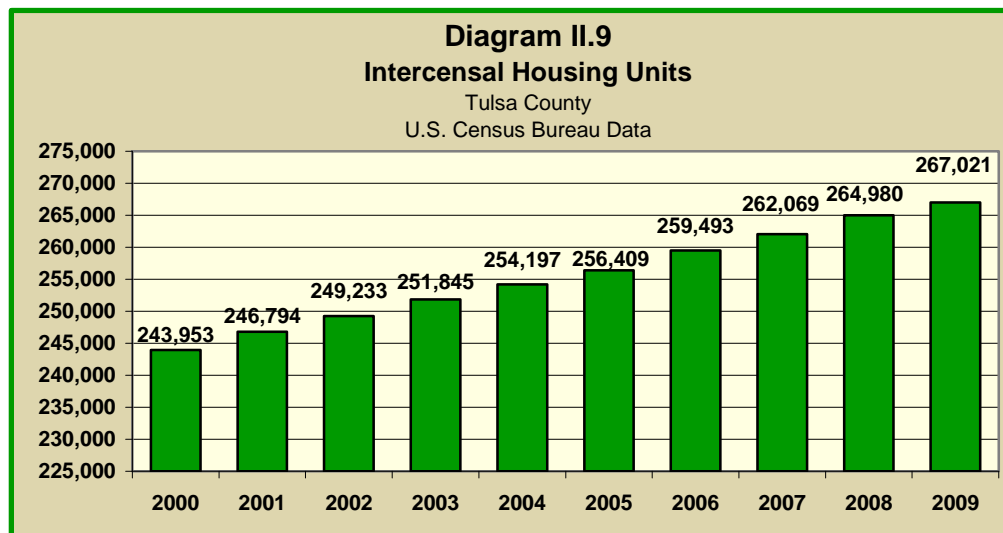


HOUSING

Data regarding the number of housing units counted in Tulsa County for the years 2000 through 2009 are presented in Table II.8, at right. In total, the number of housing units in the county increased by 9.5 percent in this ten-year time period from 243,953 units to 267,021 units. However, during this time the population in the county increased by only 6.9 percent, which suggests that housing production slightly outpaced population growth in the county in this time.

The total housing units counted by year between 2000 and 2009 for Tulsa County are presented below in Diagram II.9. As shown therein, most yearly totals showed small to moderate increases from the previous year.

Year	Housing Units
2000	243,953
2001	246,794
2002	249,233
2003	251,845
2004	254,197
2005	256,409
2006	259,493
2007	262,069
2008	264,980
2009	267,021
% Change	9.5%

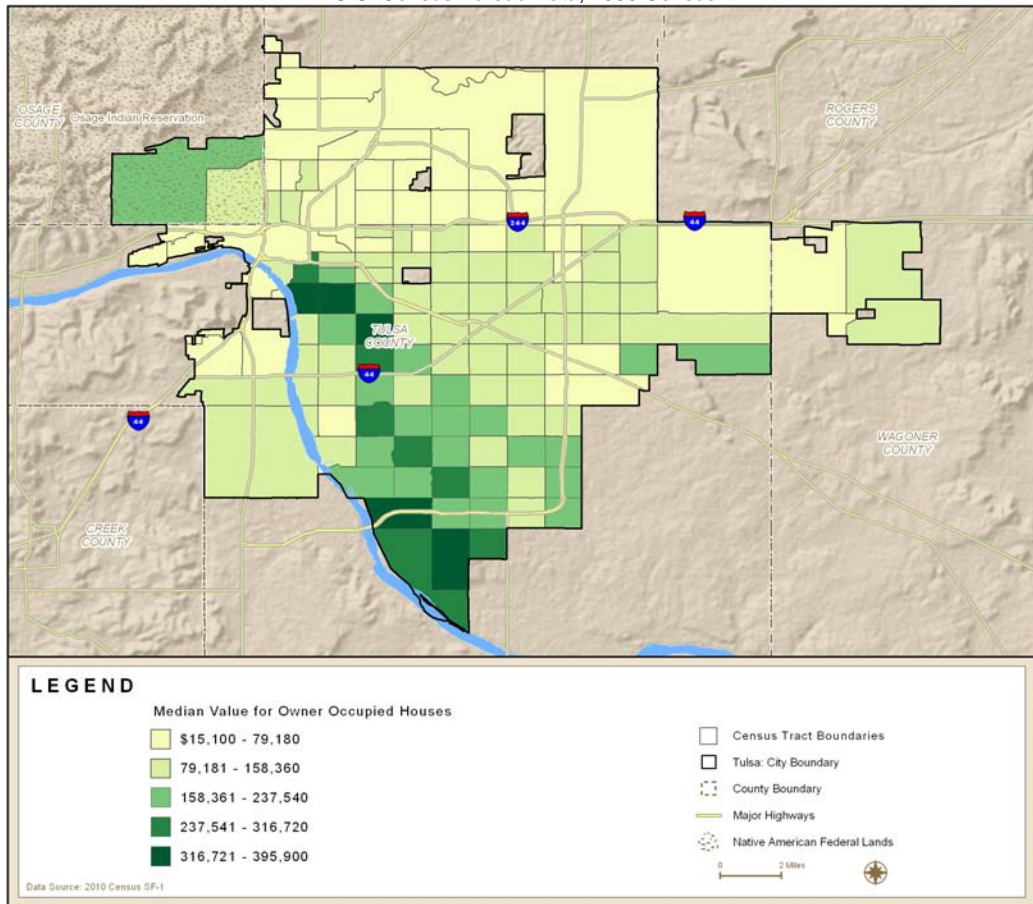


The number of persons per household as counted in the City of Tulsa at the time of the 2000 census is presented at right in Table II.9. As shown, most households in the city represented one- or two-person residences and fewer households were counted with five persons or more. Similar findings were seen in the ACS data.

Persons	2000 Census		2009 Five-Year ACS	
	Population	% of Total	Population	% of Total
One	56,250	33.9%	58,969	36.0%
Two	54,219	32.7%	53,722	32.8%
Three	24,273	14.6%	22,740	13.9%
Four	18,222	11.0%	16,227	9.9%
Five	8,454	5.1%	7,659	4.7%
Six	2,945	1.8%	3,002	1.8%
Seven >	1,479	0.9%	1,558	1.0%
Total	165,842	100.0%	163,877	100.0%

The average value of owner-occupied housing units in Tulsa is presented in Map II.17. This map shows that Tulsa's more expensive housing stock was clustered primarily in the south and southeastern parts of the city where some houses were valued at nearly \$400,000 as of 2000. Most of northern and western Tulsa showed housing values under \$80,000.

Map II.17
Median Value of Owner-Occupied Homes
 City of Tulsa
 U.S. Census Bureau Data, 2000 Census

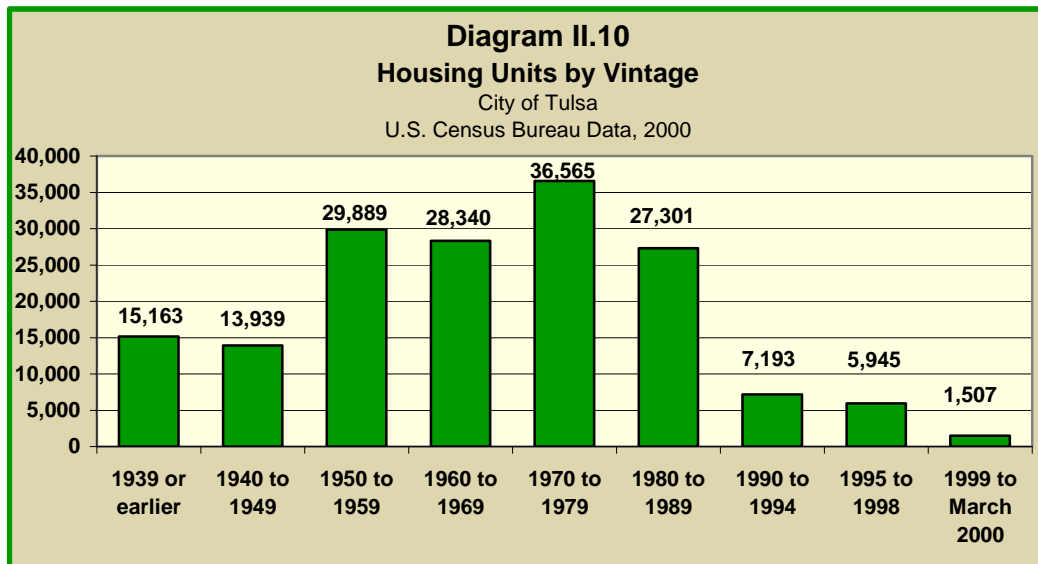


CHARACTERISTICS OF THE HOUSING STOCK

More detailed information regarding the attributes of the housing stock is available from 2000 census data and 2005 to 2009 ACS data. Table II.10, presented on the following page, shows that, as of 2000, the majority of the housing stock was built in the 1970s, although a significant portion of the housing units were built in the 1950s, 1960s and 1980s as well. More recent ACS data averages show that the proportion of units built in the 1970s was still highest, but units that were built since 2000 accounted for nearly 5.0 percent of the total housing stock.

Table II.10 Housing Units by Vintage City of Tulsa U.S. Census Bureau Data				
Vintage	2000 Census		2009 Five-Year ACS	
	Population	% of Total	Population	% of Total
1939 or earlier	15,163	9.1%	15,312	8.3%
1940 to 1949	13,939	8.4%	13,764	7.5%
1950 to 1959	29,889	18.0%	31,849	17.3%
1960 to 1969	28,340	17.1%	29,762	16.2%
1970 to 1979	36,565	22.0%	41,832	22.7%
1980 to 1989	27,301	16.5%	27,700	15.0%
1990 to 1999	14,645	8.8%	15,324	8.3%
2000 to 2004	.	.	6,683	3.6%
Built 2005 or Later	.	.	1,959	1.1%
Total	165,842	100.0%	184,185	100.0%

The age of the housing stock is also presented visually in Diagram II.10, below. As compared to many decades earlier in the century, fewer housing units were built in the time period from 1990 through March 2000.



Of the 179,491 housing units reported in Tulsa in the 2000 census, about 65.5 percent were single-family units. An additional 25.9 percent of units were counted as apartments and 4.8 percent were tri- or four-plexes. These data are presented on the following page in Table II.11.

ACS data regarding housing units by type in the city, also shown in Table II.11, suggest that the proportion of unit types generally held steady in the 2005 through 2009 time period, although there was a slight increase in the percent total of tri- or four-plexes and single-family units and a small decrease in the proportion of duplexes, apartments and mobile homes.

Table II.11				
Housing Units by Unit Type				
City of Tulsa				
U.S. Census Bureau Data				
Unit Type	2000 Census		2009 Five-Year ACS	
	Population	% of Total	Population	% of Total
Single-Family Unit	117,600	65.5%	121,459	65.9%
Duplex	3,876	2.2%	3,463	1.9%
Tri- or Four-Plex	8,650	4.8%	9,707	5.3%
Apartments	46,524	25.9%	47,094	25.6%
Mobile Homes	2,626	1.5%	2,331	1.3%
Boat, RV, Van, Etc.	215	0.1%	131	0.1%
Total	179,491	100.0%	184,185	100.0%

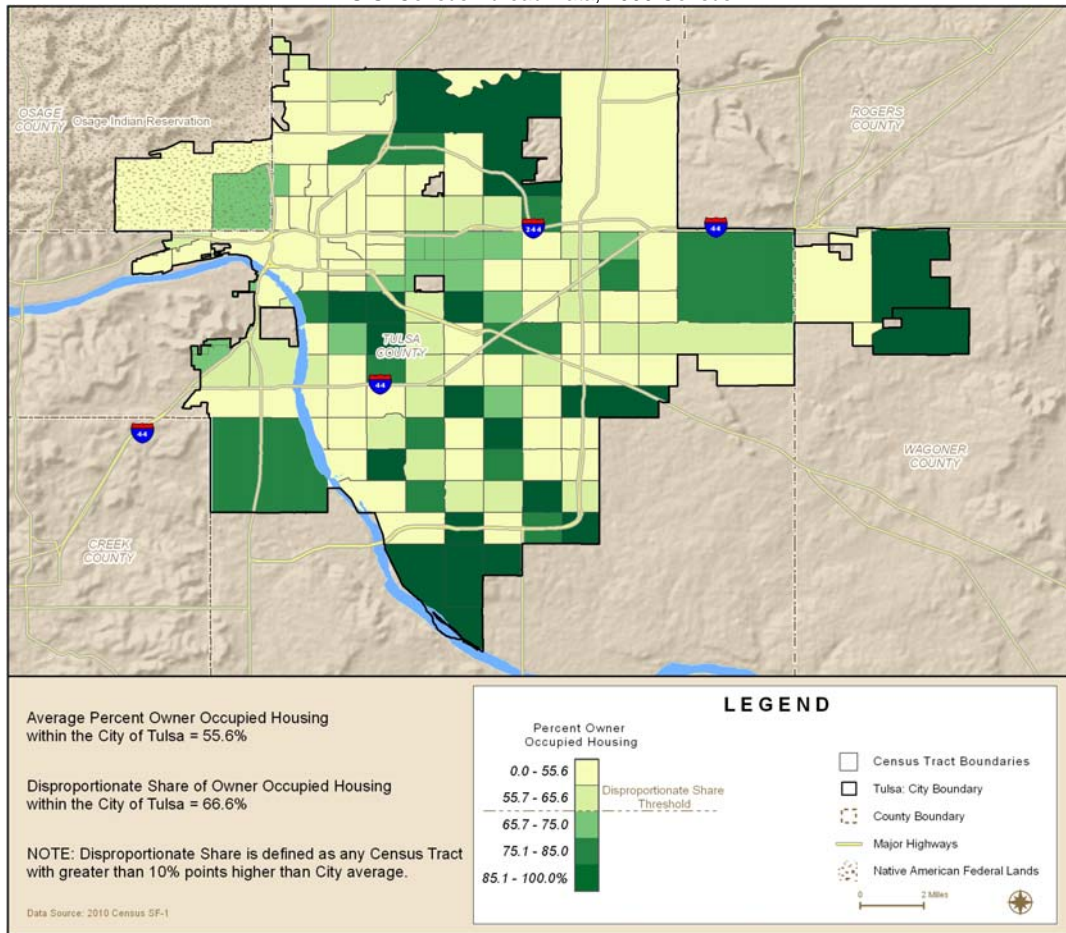
The 179,491 housing units reported in the 2000 census can also be examined by tenure status. Based on 2000 census count data, a total of 165,842 units were occupied housing units, and, of these, 55.6 percent were owner-occupied and 44.4 percent were renter-occupied. The portion of owner-occupied units was much lower than the national average of 69.0 percent at that time. A total of 13,649 housing units were vacant, as shown in Table II.12.

The 2010 census count data showed that the percentage of vacant units in the city increased significantly by nearly 55.0 percent from 13,649 to 21,152 units. This finding aligns with the research presented earlier in this section that housing production outpaced population growth during the past decade, thereby resulting in a greater number of unoccupied housing units.

Table II.12				
Housing Units by Tenure				
City of Tulsa				
U.S. Census Bureau Data				
Tenure	2000 Census		2010 Census, Redistricting Data	
	Units	% of Total	Units	% of Total
Occupied Housing Units	165,842	92.4%	163,975	88.6%
Vacant Housing Units	13,649	7.6%	21,152	11.4%
Total Housing Units	179,491	100.0%	185,127	100.0%

The distribution of owner-occupied units in the city is presented on the following page in Map II.18. This map shows that housing units in Tulsa that were occupied by homeowners instead of renters were scattered throughout the city. The tracts with extremely high levels of owner-occupied housing were mostly found in the central and southern parts of the city, although a few tracts located in the north and eastern sectors of Tulsa showed high concentrations of this type of housing as well.

Map II.18
Percent of Owner-Occupied Housing
 City of Tulsa
 U.S. Census Bureau Data, 2000 Census



VACANT HOUSING UNITS

As shown in Table II.13, on the following page, at the time of the 2000 census the vacant housing stock represented 13,649 units or 7.6 percent of the total housing stock. Data on the disposition of these vacant units indicate that about 52.6 percent were for rent, 12.0 percent were for sale, 8.6 percent were rented or sold but unoccupied, and 8.7 percent were for seasonal, recreational, or occasional use. However, 17.7 percent of the vacant housing stock was counted as “other vacant” units; this term refers to units that are not for sale or rent and tend to contribute to blight.

The number of vacant units as counted in the ACS data for 2005 through 2009 was 20,308, and more than 34.0 percent of these units were labeled as “other vacant.” This figure represents a significant, and possibly growing, portion of the housing stock that is unavailable to the market in the City of Tulsa.

Disposition	2000 Census		2009 Five-Year ACS	
	Population	% of Total	Population	% of Total
For Rent	7,181	52.6%	7,951	39.2%
For Sale	1,636	12.0%	2,065	10.2%
Rented or Sold, Not Occupied	1,169	8.6%	2,422	11.9%
For Seasonal, Recreational, or Occasional Use	1,193	8.7%	909	4.5%
For Migrant Workers	49	0.4%	16	0.1%
Other Vacant	2,421	17.7%	6,945	34.2%
Total	13,649	100.0%	20,308	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 one in six sample, also called SF3 data.⁵ These data relate to overcrowding, incomplete plumbing or kitchen facilities, and cost burdens.

Overcrowding is defined as having from 1.1 to 1.5 people per room per residence, with severe overcrowding defined as having more than 1.5 people per room. At the time that the 2000 census was taken, 4,233 or 2.6 percent of households were overcrowded and another 3,253 or 2.0 percent of units were severely overcrowded, as shown in Table II.14. This housing problem was far more prevalent in renter households as compared to owner households. Similar figures were found in the ACS data for overcrowding, but the data for severe overcrowding were significantly lower as compared to the 2000 data.

	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	%	Households	%	Households	%	
Owner							
2000 Census	90,522	98.2%	1,119	1.2%	516	0.6%	92,157
2009 Five-Year ACS	87,955	98.6%	1,039	1.2%	211	0.2%	89,205
Renter							
2000 Census	67,834	92.1%	3,114	4.2%	2,737	3.7%	73,685
2009 Five-Year ACS	71,697	96.0%	2,298	3.1%	677	0.9%	74,672
Total							
2000 Census	158,356	95.5%	4,233	2.6%	3,253	2.0%	165,842
2009 Five-Year ACS	159,652	97.4%	3,337	2.0%	888	0.5%	163,877

⁵ Summary File 3 (SF3) consists of 813 detailed tables of 2000 census social, economic and housing characteristics compiled from a sample of approximately 19 million housing units (about 1 in 6 households) that received the 2000 census long-form questionnaire. Source: <http://www.census.gov/Press-Release/www/2002/sumfile3.html>. These sample data include sampling error and may not sum precisely to the 100 percent sample typically presented in the 2000 census.

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

At the time of the 2000 census, a total of 1,257 units or 0.7 percent of all households in Tulsa were lacking complete plumbing facilities. The 2005 through 2009 ACS data average showed an increase in the percentage of units with incomplete plumbing facilities to 1.2 percent. These data are presented in Table II.15.

Table II.15		
Housing Units with Incomplete Plumbing Facilities		
City of Tulsa		
U.S. Census Bureau Data		
Facilities	2000 Census	2009 Five-Year ACS
	Population	Population
Kitchen Facilities		
Complete Plumbing Facilities	178,234	182,020
Lacking Complete Plumbing Facilities	1,257	2,165
Total Households	179,491	184,185
Percent Lacking	0.7%	1.2%

Table II.16 shows the number of housing units with incomplete kitchen facilities in the City of Tulsa. There was a higher percentage of units found to have incomplete kitchen facilities as compared to plumbing facilities with 0.9 percent of total units counted with this classification in the census count and 2.7 percent of units counted in the ACS data.

Table II.16		
Housing Units with Incomplete Kitchen Facilities		
City of Tulsa		
U.S. Census Bureau Data		
Facilities	2000 Census	2009 Five-Year ACS
	Population	Population
Kitchen Facilities		
Complete Kitchen Facilities	177,873	179,295
Lacking Complete Kitchen Facilities	1,618	4,890
Total Households	179,491	184,185
Percent Lacking	0.9%	2.7%

The third type of housing problem reported in the 2000 census is cost burden. Cost burden is defined as gross housing costs that range from 30.0 to 50.0 percent of gross household income; severe cost burden is defined as gross housing costs that exceed 50.0 percent of gross household income. For homeowners, gross housing costs include property taxes, insurance, energy payments, water and sewer service, and refuse collection. If the homeowner has a mortgage, the determination also includes principal and interest payments on the mortgage

loan. For renters, this figure represents monthly rent and selected electricity and natural gas energy charges.

Table II.17 shows that in the City of Tulsa, 14.7 percent of households had a cost burden and 10.8 percent of households had a severe cost burden in 2000. These figures compared very favorably to the national average of 20.8 percent and 19.1 percent at that time, respectively. Roughly 14.5 percent of homeowners with a mortgage experienced a cost burden and 8.2 percent experienced a severe cost burden, while 18.8 percent of renters had a cost burden and 15.6 percent had a severe cost burden. ACS data averages for 2005 through 2009 showed that the overall percentage of owners and renters with a cost burden or severe cost burden increased as compared to 2000 census data, but this was particularly true for renters.

Table II.17									
Cost Burden and Severe Cost Burden by Tenure									
City of Tulsa									
U.S. Census Bureau Data									
Census	Less Than 30.0%		31% - 50%		Above 50%		Not Computed		Total
	Households	%	Households	%	Households	%	Households	%	
Owner With a Mortgage									
2000 Census	43,197	76.8%	8,135	14.5%	4,596	8.2%	296	0.5%	56,224
2009 Five-Year ACS	41,239	70.4%	10,790	18.4%	6,266	10.7%	256	0.4%	58,551
Owner Without a Mortgage									
2000 Census	25,626	90.0%	1,341	4.7%	1,002	3.5%	506	1.8%	28,475
2009 Five-Year ACS	26,687	87.1%	2,148	7.0%	1,584	5.2%	235	0.8%	30,654
Renter									
2000 Census	43,653	59.4%	13,801	18.8%	11,450	15.6%	4,638	6.3%	73,542
2009 Five-Year ACS	36,298	48.6%	17,182	23.0%	16,434	22.0%	4,758	6.4%	74,672
Total									
2000 Census	112,476	71.1%	23,277	14.7%	17,048	10.8%	5,440	3.4%	158,241
2009 Five-Year ACS	104,224	63.6%	30,120	18.4%	24,284	14.8%	5,249	3.2%	163,877

People who experience a severe cost burden are at risk of homelessness. For example, cost-burdened renters who experience one financial setback are likely to have to choose between rent and food or rent and healthcare for their family. Similarly, such homeowners with a mortgage and just one unforeseen financial constraint, such as temporary illness, divorce or the loss of employment, may be forced to 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 home and in turn contribute to a dilapidation and blight problem. All three of these situations should be of concern to policy makers and program managers.

LEAD-BASED PAINT RISKS

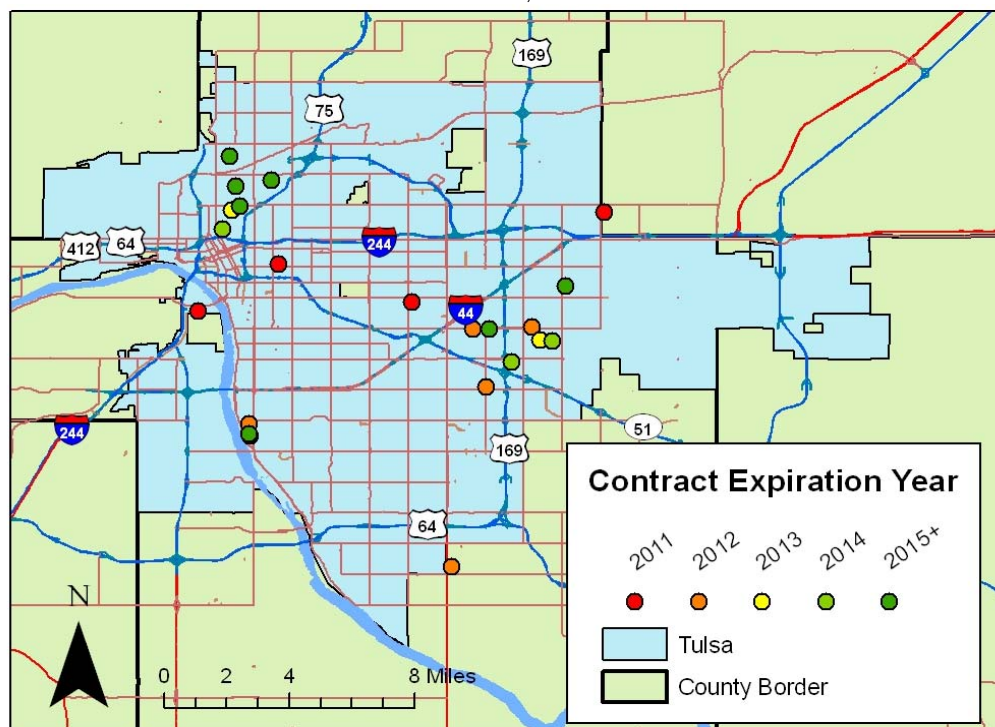
Data related to lead-based paint risks within Tulsa’s housing stock are presented in Table II.18, on the following page. These numbers are based on the likelihood of lead-based paint risks in relation to the age of the housing unit. In total, 123,896 units within the city held a risk of lead-based paint hazards at the time of the 2000 census.

Table II.18 Lead-Based Paint Risks to Occupied Housing Units City of Tulsa U.S. Census Bureau Data, 2000	
Year Built	Housing Units with Lead Based Paint Risk
1939 or earlier	15,163
1940 to 1949	13,939
1950 to 1959	29,889
1960 to 1969	28,340
1970 to 1979	36,565
Total	123,896

PUBLIC HOUSING

The location of Section 8 public housing projects was also examined through the course of this AI. Map II.19, presented below, shows that there were more than 20 Section 8 housing projects in the city as of 2010. The majority of these projects were clustered in the central eastern and central northwestern portions of the city. Most of the units located in the northern part of the city have contracts that are expected to remain in effect through 2015.

Map II.19
Location and Anticipated Expiration of Section 8 Projects
 City of Tulsa
 HUD Data, 2010



SUMMARY

According to the U.S. Census Bureau, between 2000 and 2010 the population in the City of Tulsa decreased slightly from 393,049 to 391,906 persons or by 0.3 percent. American Community Survey data for population by age, representing a 2005 to 2009 average, show that most persons in the city were between the ages of 35 and 54. In terms of race and ethnicity, since 2000, the white population in the city actually declined by more than 10.0 percent while all other racial groups grew in size. The Hispanic ethnic population was also shown to have increased over the last decade and actually almost doubled in size to 55,266 persons. Some racial and ethnic populations, especially black and Hispanic groups, have been geographically concentrated in select areas of the city, specifically in North Tulsa. At the time of the 2000 census, the city had a disability rate of 20.5 percent, which was slightly higher than the 19.0 percent national rate. The disabled population was also slightly concentrated in select areas of the city, particularly in the northwestern portion.

Data from the Bureau of Labor Statistics showed that the labor force in Tulsa, defined as people either working or looking for work, held relatively stable at 190,155 persons between 2008 and 2009, but total employment figures dropped significantly to 177,867 persons. As a result of the increasing labor force and decreasing employment rate, the unemployment rate increased to 6.5 percent in 2009 and then to 7.1 percent by the end of 2010. Data from the Bureau of Economic Analysis showed that average earnings per job in Tulsa have been stronger than state figures with the city average almost \$10,000 greater than the average for Oklahoma. In Tulsa, the poverty rate average for 2005 through 2009 was 19.0 percent with 71,041 persons considered to be living in poverty, and this group was concentrated primarily in the northern part of the city. Evaluation of the location of job and employment centers in relation to transportation showed that the placement of these services may not be adequately addressing the needs of North Tulsa. Further, analysis of community investment data demonstrated that North Tulsa may not be receiving equitable community lending.

The number of housing units in Tulsa County increased by 9.5 percent or from 243,953 units to 267,021 units between 2000 and 2009. Still, the majority of the housing stock was built in the 1970s. Of the 243,953 housing units reported in the 2000 census, about 65.0 percent were single-family units, and more recent data from the U.S. Census Bureau showed that this percentage held steady. A total of 165,842 units were occupied housing units, and, of these, 55.6 percent were owner-occupied and 44.4 percent were renter-occupied. Of the unoccupied housing units counted in the city in 2000, 2,421 were noted to be "other vacant" units that are unavailable to the market and can contribute to blight; more recent data show that the percentage of this type of unit may be increasing in the city. At the time that the 2000 census was taken, 4,233 or 2.6 percent of households were overcrowded and another 3,253 or 2.0 percent of households were severely overcrowded, but 2005 to 2009 data averages show that the percentage of units with this housing problem might be decreasing. In Tulsa, 0.7 and 0.9 percent of all households were lacking complete plumbing or kitchen facilities, respectively, in 2000 but this housing problem was shown to have worsened in more recent data. Additionally, in 2000 14.7 percent of households had a cost burden and 10.8 percent of households had a severe cost burden, but 2005 to 2009 data averages showed that both of these percentages increased since that time by nearly 4.0 percentage points.

SECTION III. REVIEW OF THE FAIR HOUSING PROFILE

The purpose of this section is to provide a profile of fair housing in the city including an enumeration of key agencies and organizations contributing to affirmatively furthering fair housing in the City of Tulsa, an evaluation of presence and scope of services of existing fair housing organizations, a review of the complaint process, and analysis of national and local fair housing studies and cases.

FAIR HOUSING ORGANIZATIONS

THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

The United States Department of Housing and Urban Development (HUD) oversees, administers and enforces the Fair Housing Act. HUD's regional office in Fort Worth, Texas oversees housing, community development and fair housing enforcement in Oklahoma, as well as Arkansas, Louisiana, New Mexico, and Texas.⁶ The Office of Fair Housing and Equal Opportunity (FHEO) within HUD's Fort Worth office enforces the federal Fair Housing Act and other civil rights laws that prohibit discrimination in housing, mortgage lending and other related transactions in Oklahoma. HUD also provides education and outreach, monitors agencies that receive HUD funding for compliance with civil rights laws, and works with state and local agencies under the Fair Housing Assistance Program and Fair Housing Initiative Program, as described below.

Fair Housing Assistance Program

In the U.S., many agencies receive funding directly from HUD as Fair Housing Assistance Program (FHAP) recipients. FHAP recipients require an ordinance or law that empowers a state or local governmental agency to enforce the state or local fair housing laws; if HUD determines that the local entity can operate on a "substantially equivalent" level to federal agency enforcement activities, HUD contracts with that agency to process fair housing complaints and reimburses the jurisdiction on a per case basis.⁷ FHAP grants are given to public, not private, entities and are given on a noncompetitive, annual basis to substantially equivalent state and local fair housing enforcement agencies.

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

⁶ <http://www.hud.gov/offices/fheo/aboutfheo/fhhubs.cfm#hdcent>

⁷ <http://www.hud.gov/offices/fheo/progdesc/title8.cfm>

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

Fair Housing Initiative Program

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

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

Grantee eligibility:

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

Eligible activities:

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

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

Grantee eligibility:

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

Eligible activities:

Conducting complaint-based and targeted testing investigations of housing discrimination, linking fair-housing organizations in regional enforcement activities, and establishing effective means of meeting legal expenses in support of litigation.

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

Grantee eligibility:

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

Eligible activities:

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

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

In 2007, the FHIP program awarded \$18.1 million: \$14 million for PEI and \$4.1 for EOI. One organization operating in Oklahoma, the Metropolitan Fair Housing Council of Oklahoma, Inc. (MFHCO), received FHIP grants that year.⁸

The Metropolitan Fair Housing Council of Oklahoma (MFHCO) will provide fair housing enforcement services throughout Oklahoma. MFHCO will conduct complaint intake, investigation, and referral and use paired testing to gather evidence during investigations.

In 2008 the FHIP program awarded \$21.8 million: \$20 million for PEI and \$1.3 million for EOI. An additional \$500,000 was granted for an EOI Clinical Law School Component. The MFHCO was the only organization in Oklahoma to receive FHIP grant funding in 2008.⁹

MFHCO will continue the expansion of current statement enforcement activities resulting in enforcement remedies under Title VIII to include complaint processing, investigations/testing and complaint referrals to HUD on behalf of all protected classes. Enforcement activities will include complaint-based tests [rental/sales/lending], accessibility audits of covered multi-family homes constructed after March 13, 1991; and the conducting of systemic tests of housing providers. MFHCO will also conduct a statewide public information campaign to disseminate fair housing education.

In 2009, the MFHCO again received funding to continue fair housing efforts in Oklahoma.

The MFHCO will use its grant to intake at least 700 housing inquiries from Oklahoma consumers with housing questions/complaints, refer at least 65 housing discrimination complaints to HUD for processing, conduct 75 complaint-based tests, conduct ten systemic tests, and partner with at least eight public and private organizations in Oklahoma to

⁸ <http://www.hud.gov/news/releases/pr07-148.pdf>

⁹ <http://www.hud.gov/offices/theo/partners/FHIP/FY2008FHIP.cfm#mn>

educate low- and moderate-income persons, persons with disabilities, the elderly, minorities, families with children and persons who are non-English speaking or have limited English proficiency about fair housing, fair lending practices, renters rights, foreclosure prevention and loss mitigation.

The MFHCO received FHIP grant funding again in 2010.

The MFHCO will use its grant to conduct intakes of housing inquiries/intakes from consumers with housing questions or complaints; conduct complaint-based tests (rental, sales, lending) and systemic tests; conduct accessibility audits of covered, multi-family housing; conduct requests for reasonable accommodation or modification; and refer enforcement proposals to HUD for processing. MFHCO also will partner with public and private organizations in Oklahoma to educate low-and moderate-income persons, persons with disabilities, the elderly, minorities, families with children and persons who are non-English speaking or have limited English proficiency about fair housing-fair lending practices, renters rights, foreclosure prevention and loss mitigation to increase homeownership, rental opportunities and help prevent homelessness.

In March 2011 it was announced that HUD would again fund the MFHCO as a FHIP organization in Oklahoma.

The MFHCO will specifically use its \$324,808 Private Enforcement Initiative (PEI) grant to conduct complaint intake services; to provide complaint-based tests (rental, sales, lending) and systemic tests, and to conduct disability accessibility audits of covered, multi-family housing. MFHCO will also partner with public and private organizations in Oklahoma to provide education about fair housing/fair lending practices; renters' rights; reasonable accommodation in housing for the disabled; and foreclosure prevention and loss mitigation to increase homeownership, rental opportunities and help prevent homelessness.

OKLAHOMA HUMAN RIGHTS COMMISSION

The Oklahoma Human Rights Commission (HRC) is a statewide Fair Housing Assistance Program (FHAP) recipient agency that provides discrimination assistance services to residents of Oklahoma. The HRC has the authority to investigate complaints of discrimination in housing, along with employment and public accommodations, based on race, color, religion, sex, national origin, disability, age and familial status. In housing, this may include discrimination complaints related to threats, intimidation, coercion, retaliation or other questionable actions in the sale, rental and financing of housing. Complaints regarding failure to make reasonable accommodations or modifications are also accepted. In addition to accepting complaints of discrimination, the HRC also works to promote unity and understanding throughout the state through educational outreach services.

TULSA HUMAN RIGHTS DEPARTMENT

The Tulsa Human Rights Department (HRD) is located within City Hall in the City of Tulsa. The HRD, which was created by Title 5 of the revised City ordinances, exists to receive and investigate complaints of discrimination in the areas of employment, public accommodations and housing. The mission statement of the HRD states that the agency works to “promote equal opportunity and democratic rights, and protect human rights of persons in Tulsa against discrimination because of race, color, religion, sex, national origin, age, disability, marital status or familial status, through advisory, educational and enforcement services.”

TULSA AREA FAIR HOUSING PARTNERSHIP

The Tulsa Area Fair Housing Partnership exists as a collaborative fair housing group within the City of Tulsa. The mission of the Partnership is to increase the community’s understanding of and commitment to fair housing through outreach, education and facilitation of dialogue. Additionally, this group works with the goal of increasing awareness of fair housing rights to help foster an understanding of the ill-effects of discrimination and how equal and fair treatment can be achieved in the rental or sale of housing. The Partnership consists of a number of different agencies throughout the area:

- Ability Resources, Inc.,
- Community Action Project of Tulsa County,
- Community Action Resource & Development, Inc.,
- City of Tulsa,
- Greater Tulsa Association of REALTORS,
- Housing Partners of Tulsa, Inc.,
- Indian Nations Council of Governments,
- Legal Aid Services of Oklahoma, Inc.,
- Mental Health Association in Tulsa,
- Metropolitan Fair Housing Council of Oklahoma,
- Oklahoma Human Rights Commission,
- Tulsa Housing Authority,
- U.S. Department of Housing and Urban Development.

The Partnership conducts monthly meetings in Tulsa to discuss fair housing issues and also sponsors fair housing outreach activities. For example, during Fair Housing Month in April, the Partnership held sponsorship of a number of fair housing workshops covering topics such as understanding of fair housing law, what qualifies as reasonable accommodation, and how to transition from home renter to home owner.

METROPOLITAN FAIR HOUSING COUNCIL OF OKLAHOMA, INC.

The Metropolitan Fair Housing Council of Oklahoma, while located in Oklahoma City, provides some fair housing services to the City of Tulsa as a Fair Housing Initiative Program (FHIP) recipient. This agency conducts a variety of services and projects throughout the state including intake of fair housing inquiries and complaints, referral of fair housing concerns, and complaint-based and accessibility testing.

COMPLAINT AND COMPLIANCE REVIEW

A myriad of federal laws provide the backbone for fair housing regulations in the U.S. While some laws have already been discussed previously in this report, a brief review of laws related to fair housing as noted on the HUD website¹⁰ is presented below.

Fair Housing Act. Title VIII of the Civil Rights Act of 1968, also known as the federal 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 people securing custody of children under the age of 18), and handicap (disability).

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 assistance.

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

Section 109 of Title I 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 of the Americans with Disabilities Act of 1990 prohibits discrimination based on disability in programs, services and activities provided or made available by public entities. HUD enforces Title II when it relates to state and local public housing, housing assistance and housing referrals.

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

Age Discrimination Act of 1968. The Age Discrimination Act of 1968 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.

In addition to Federal Law, citizens of Tulsa are also protected by two state laws: the Oklahoma Human Right Commission Title 25 and the Non-Residential/Residential Landlord and Tenant Acts. Title 25 provides definitions and general provisions regarding human rights in the state and includes race, color, religion, gender, national origin, age, familial status, and handicap as protected classes. Eighteen separate discriminatory housing practices are clearly defined and considered unlawful under this title including failure to rent, sell or broker housing

¹⁰ <http://www.hud.gov/offices/fheo/FHLaws/index.cfm>

based on any protected class. The Non-Residential/Residential Landlord and Tenant Acts define the legal roles, rights and responsibilities of both tenants and landlords. Section 123 of this act allows tenants who are wrongfully removed or excluded from a dwelling to not only recover their personal property but also seek reimbursement of up to twice the monthly rent or twice their actual damages, whichever is greater.

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

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

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

In Oklahoma, the contact information for the regional HUD office in Fort Worth, Texas is:

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
(817) 978-5900
1-800-669-9777

There are also two field offices located in the state, one in Oklahoma City and the other in the City of Tulsa. The address and contact information for the office in Tulsa is as follows:

Tulsa Field Office
Williams Center Tower II
2 West Second Street
Suite 400
Tulsa, OK 74103
(918) 292-8900

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

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

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 reasonable cause is found, then either a federal judge or a HUD Administrative Law Judge hears the case and determines damages, if any.¹¹ A respondent may be ordered:

- To compensate for actual damages, including humiliation, pain and suffering.
- To provide injunctive or other equitable relief to make the housing available.
- To pay the Federal Government a civil penalty to vindicate the public interest. The maximum penalties are \$10,000 for a first violation and \$50,000 for an additional violation within seven years.
- To pay reasonable attorney's fees and costs.¹²

COMPLAINT PROCESS FOR THE OKLAHOMA HUMAN RIGHTS COMMISSION

The Oklahoma Human Rights Commission (HRC) accepts housing discrimination complaints from within the state. Complaints must be filed within one year of the alleged occurrence of the discriminatory action. The contact information for the main office of the HRC is:

Jim Thorpe Building
2010 North Lincoln Blvd, #480
Oklahoma City, OK 73105-4904
(405) 521-2360
(888) 456-2558
<http://www.ok.gov/ohrc>

However, the HRC also has a field office that is located in the City of Tulsa. The contact information for this branch is:

Kerr Office Building
440 South Houston #302
Tulsa, OK 74127
(918) 581-2733
(888) 456-2006

If a person within the State of Oklahoma is interested in filing a complaint with the HRC they can do so by contacting either the main office or branch location and speaking with an intake officer. After a complaint is formally filed, the defendant is contacted and is required to make responding remarks to the allegations. After the response is received, the investigation process continues with review of documentation and questioning of witnesses. The review process results in either a determination of reasonable cause or no reasonable cause. If reasonable

¹¹ <http://www.hud.gov/offices/fheo/complaint-process.cfm>

¹² <http://www.hud.gov/offices/fheo/FHLaws/yourrights.cfm>

cause is found, attempts are made to resolve the complaint, but if resolution cannot be reached, then the complaint may be taken to administrative hearing or to court.

COMPLAINT PROCESS FOR THE TULSA HUMAN RIGHTS DEPARTMENT

The City of Tulsa Human Rights Department (HRD) accepts complaints from within Tulsa that are in violation of federal, state or local fair housing laws. The contact information for the HRD is as follows:

175 East 2nd Street
One Technology Center, 8th Floor
Tulsa, OK 74103
(918) 596-7818
(918) 596-7826 (fax)
<http://www.cityoftulsa.org/community-programs/human-rights.aspx>

The web address listed above directs users to the main HRD page which offers information about the department and the complaint process. A complaint can be filed by selecting the “File a Complaint” link and either submitting a complaint form online or printing the form and mailing it or faxing it to the address or fax number listed above. The complaint form asks for an array of details regarding the complaint including who is filing, which protected class status was violated and who allegedly violated fair housing law. A person may also contact the HRD to discuss the complaint or receive aid in filing a complaint with the agency.

According to the HRD website, after a complaint is filed, the HRD conducts review and analysis of all submitted evidence and makes one of three possible determinations:

- Probable Cause: Based on the evidence, discrimination is believed to have occurred and the defendant must provide relief such as compensation.
- Negotiated Settlement: Prior to completion of the investigation, all parties were willing to settle.
- No Probable Cause: Gathered evidence does not support discrimination and the case is dismissed.

RELATED NATIONAL AND STATEWIDE FAIR HOUSING STUDIES

NATIONAL FAIR HOUSING STUDIES AND ARTICLES

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

In April 2002, HUD released, “How Much Do We Know?,” a national study which assessed public awareness of and support for fair housing law. The study found that only one-half of the general public was able to identify six or more of eight scenarios describing illegal conduct. In addition, 14.0 percent of the nationwide survey’s adult participants believed that they had experienced some form of housing discrimination in their lifetime. However, only 17.0 percent of those who had experienced housing discrimination had done something about it. Last, two-thirds of all respondents said that they would vote for a fair housing law.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, as well as its desire to report such discrimination. Unfortunately, the study found that overall public knowledge of fair housing laws had not improved between 2000 and 2005. As before, just half of the public knew the law with respect to six or more illegal housing activities. In the 2006 report, 17.0 percent of the study’s adult participants claimed to have experienced discrimination when seeking housing; however, after reviewing descriptions of the perceived discrimination, it was determined that only about 8.0 percent of the situations might be covered by the Fair Housing Act. Four out of five individuals who felt they had been discriminated against did not file a fair housing complaint, indicating that they felt it “wasn’t worth it” or that it “wouldn’t have helped.” Others didn’t know where to complain, assumed it would cost too much, were too busy or feared retribution.¹⁴ One positive finding of the survey was that public support for fair housing laws increased from 66.0 percent in 2000 to 73.0 percent in 2005.

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, although the process had improved in recent years, between 1996 and 2003 the median number of days required to complete fair housing complaint investigations was 259 for HUD’s Fair Housing and Equal Opportunity Offices and 195 for FHAP agencies. The report did find a higher percentage of investigations completed within the FHA’s 100-day mandate.¹⁵ The GAO report also identified the following trends between 1996 and 2003:

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

¹³ *How Much Do We Know?* United States Department of Housing and Urban Development, Office of Policy Development and Research, 2002. Document available at <http://www.huduser.org/Publications>.

¹⁴ *Do We Know More Now?* United States Department of Housing and Urban Development, Office of Policy Development and Research, 2006. Document available at <http://www.huduser.org/Publications>.

¹⁵ *Fair Housing: Opportunities to Improve HUD’s Oversight and Management of the Enforcement Process*, United States General Accounting Office, Report to Congressional Requesters, April 2004.

percentage of investigations were resolved by the parties themselves or with help from FHEO or FHAP agencies.

Released by the Poverty and 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, the majority of public housing residents are non-white and most public housing accommodations are grouped in the same census tracts, which results in residential segregation. Similarly, many Section 8 voucher holders are racial or ethnic minorities and most housing that accepts Section 8 vouchers is grouped in a few select areas, which again results in residential segregation. The report offers recommendations to curb such residential segregation, which include:

- Dispersing public housing developments throughout cities and communities; and
- Providing greater incentives for landlords with properties throughout an area to accept the coupons.¹⁶

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 such as 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. Currently, while individual landlords who post discriminatory advertisements may be held responsible, there are no such standards for companies, like Craigslist, that post the advertisements that are discriminatory. Other publishers of content, like newspapers, are currently required to scan the advertisements they accept for publishing for content that could be seen as discriminatory such as phrases like “no children” or “Christian only” that violate provisions of the Fair Housing Act in their stated preferences that violate protected groups like families with children and religion.

In May 2010, the National Fair Housing Alliance published a fair housing trends report, entitled “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 laws and noted the agency’s willingness to challenge local jurisdictions that failed to affirmatively further fair housing such as in the landmark cases against Westchester County, New York (see next section). In response to the recent foreclosure crisis, many credit institutions have implemented tactics to reduce risk, but 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.¹⁷

¹⁶ <http://www.prrac.org/pdf/FinalCERDHousingDiscriminationReport.pdf>

¹⁷ National Fair Housing Alliance, “A Step Forward”, Accessed January 24, 2011

OTHER CASES WITH NATIONAL IMPLICATIONS

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 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 analysis of impediments. In the settlement, Westchester County will be forced to pay more than \$30 million to the federal government, with roughly \$20 million eligible to return to the County to aid in public housing projects. The County must also set aside \$20 million to build public housing units in suburbs and areas with mostly white populations. The ramifications of this case are expected to affect housing policies of both states and entitlement communities across the nation, in which 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 Texas State government to provide relief from damage caused by hurricanes Ike and Dolly. These storms ravaged homes in coastal communities, and many of these homes were owned by low-income families who could not afford to rebuild. However, instead of directing the federal funds to the areas most affected by the storms, the State spread the funds across Texas and let local planning agencies spend at will. In 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 that 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 could be resolved. A settlement was reached in June 2010. As part of the settlement, the State was required to redirect 55.0 percent of the amount of the original funds to aid poorer families who lost their homes. The State was also asked to rebuild public housing units that were destroyed by the storms and offer programs to aid minority and low-income residents in relocating to less storm-prone areas or areas with greater economic opportunities.

LOCAL FAIR HOUSING CASES AND STUDIES

In 2003, the Community Action Project released a study regarding predatory lending in Tulsa and its effects on the housing market in the report "Stealing the American Dream: Predatory Lending in Oklahoma." According to the article, predatory lending, which involves high-interest rate lending to vulnerable borrowers, saw an extreme increase in Oklahoma in the late 1990s of nearly 400.0 percent. While this type of lending was noted to have been fairly widespread in the state, subprime lending was more likely to be targeted to certain groups such as minority racial and ethnic populations, persons with lower income and the elderly. Additionally, it was suggested that subprime lending for minority populations was likely underrepresented because many lenders choose to list the race as "unknown."

A presentation from 2009 created by the Oklahoma Homebuyer Education Association and the Community Action Partnership showed that racial and ethnic discrimination in the lending market remains a problem for Tulsa, especially in the form of subprime lending or lending that occurs at higher and often unfair interest rates. This presentation noted that in Oklahoma in 2007, the occurrence of subprime lending for minorities was at a rate of 31.3 percent, which suggests that nearly one-third of all loans made to minorities were high interest rate loans. The rate was much higher in Tulsa at 50.6 percent. Higher rates were also seen for specific minority groups. For example, black applicants saw a rate of subprime lending at 66.3 percent compared to 42.3 percent statewide and Hispanic applicants saw a rate of 37.0 percent compared to 31.5 percent statewide. These rates can be compared to a state subprime rate for whites of 21.1 percent and a 30.1 percent rate for Tulsa. Additionally, this presentation showed the rate of foreclosures for minorities throughout Tulsa. The findings showed that in the five census tracts with more than 50 foreclosures in the last six months of 2008, there was likely also a higher presence of minority populations, especially black persons. The findings of this article support HMDA data analysis presented in Section IV of this report.

RECENT FAIR HOUSING SUITS FILED WITH THE U.S. DEPARTMENT OF JUSTICE

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;
- Where people who believe that they have been victims of an illegal housing practice file a complaint with HUD or file their own lawsuit in federal or state court.

No cases filed in Tulsa were listed on the U.S. Department of Justice website as of April 2011.

SUMMARY

A review of the fair housing profile in the City of Tulsa revealed that the City has a solid and present fair housing structure. There are several organizations that provide fair housing services, including outreach and education, complaint intake, and testing and enforcement activities, for both providers and consumers of housing. These organizations include the U.S. Department of Housing and Urban Development (HUD), the Oklahoma Human Rights Commission, which exists as a substantially equivalent agency to HUD in the state, the Tulsa Human Rights Department, the Metropolitan Fair Housing Council of Oklahoma, and the Tulsa Fair Housing Partnership. Many of these groups accept fair housing complaints, and the complaint process within these organizations is accessible and straightforward. Examination of both national and local fair housing studies and cases supported the idea that while housing discrimination has improved in recent years, both nationally and locally, problems still exist.

SECTION IV. FAIR HOUSING IN THE PRIVATE SECTOR

As part of the AI process, HUD suggests that analysis focus on possible housing discrimination issues in both the private and public housing sectors. Examination of Tulsa's public housing sector is presented in Section V, but the focus of this section lies on research into the state of fair housing in Tulsa's private housing sector including the mortgage lending market, the real estate market, the rental market and other private housing industries.

HOME MORTGAGE DISCLOSURE ACT DATA

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

The **Equal Credit Opportunity Act** was passed in 1974 to prohibit discrimination in lending based on race, color, religion, national origin, sex, marital status, age, receipt of public assistance or the exercise of any right under the Consumer Credit Protection Act.¹⁸

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

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. 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 loans and applications for such loans.¹⁹ Both types of lending institutions must meet a set of reporting criteria, as follows:

1. The institution must be a bank, credit union or savings association.
2. The total assets must exceed the coverage threshold.²⁰
3. The institution must have had an office in a metropolitan statistical area (MSA).

¹⁸ *Closing the Gap: A Guide to Equal Opportunity Lending*, The Federal Reserve Bank of Boston, April 1993.

¹⁹ Data are considered "raw" because they contain entry errors and incomplete loan applications. Starting in 2004, the HMDA data made substantive changes in reporting. It modified the way it handled Hispanic data, loan interest rates, as well as the reporting of multifamily loan applications.

²⁰ Each December the Federal Reserve announces the threshold for the following year. The asset threshold may change from year to year, based on changes in the Consumer Price Index for Urban Wage Earners and Clerical Workers.

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

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

1. The institution must be a for-profit organization.
2. The institution's home purchase loan originations must equal or exceed 10.0 percent of the institution's total loan originations, or more than \$25 million.
3. The institution must have had a home or branch office in an MSA or have received applications for, originated or purchased five or more home purchase loans, home improvement loans, or refinancing mortgages on property located in an MSA in the preceding calendar year.
4. The institution must have assets exceeding \$10 million or have originated 100 or more home purchases in the preceding calendar year.

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

As presented in Table IV.1, HMDA information was collected for the City of Tulsa for the years 2004 through 2009. During this time, 197,290 loan applications were reported by participating institutions for home purchases, home improvements and refinancing mortgages. A total of 86,290 of these loan applicants were specifically for home purchases.

Table IV.1							
Purpose of Loan by Year							
City of Tulsa HMDA Data							
Purpose	2004	2005	2006	2007	2008	2009	Total
Home Purchase	14,173	17,890	19,291	14,272	10,230	10,434	86,290
Home Improvement	3,164	3,443	3,093	2,830	2,332	1,922	16,784
Refinancing	20,914	19,584	15,765	12,332	9,919	15,702	94,216
Total	38,251	40,917	38,149	29,434	22,481	28,058	197,290

Within this set of data, it is of prime importance to evaluate only the owner-occupied home purchase transactions. Home purchases and access to homeownership are the focus of this particular analysis because the other categories typically apply to units already purchased and do not reflect the ability of an individual to choose an owner-occupied home. As seen in Table IV.2, on the following page, of the 86,290 home purchase loan applications, 75,661 were specifically for owner-occupied homes. The number of owner-occupied home purchase loan applications was highest in 2006 at 16,170.

Table IV.2							
Owner Occupancy Status for Home Purchase Loan Application							
City of Tulsa HMDA Data							
Status	2004	2005	2006	2007	2008	2009	Total
Owner-Occupied	12,440	15,537	16,170	12,524	9,231	9,759	75,661
Not Owner-Occupied	1,644	2,270	3,038	1,685	982	657	10,276
Not Applicable	89	83	83	63	17	18	353
Total	14,173	17,890	19,291	14,272	10,230	10,434	86,290

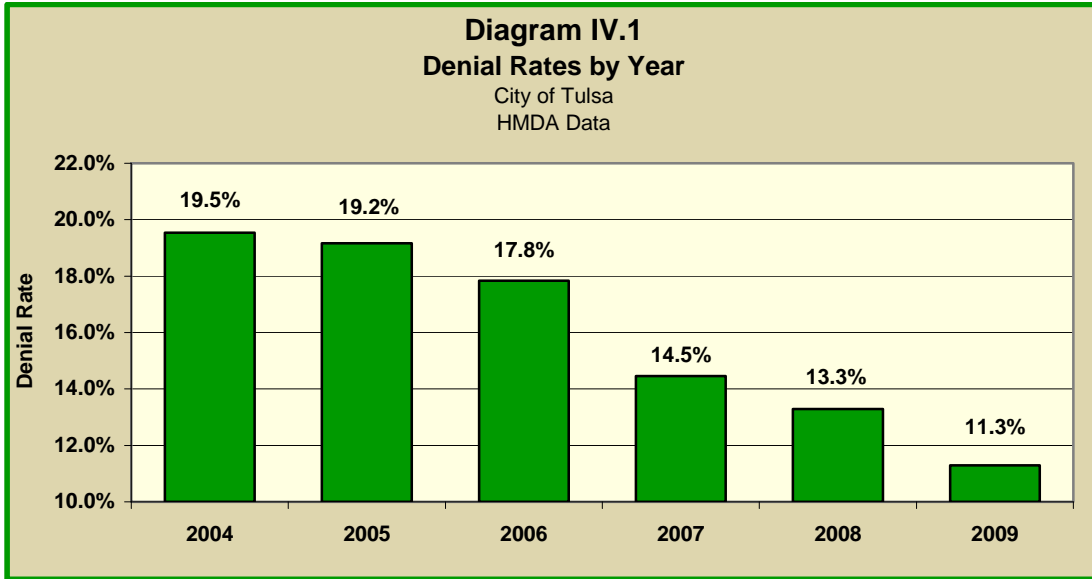
After the owner-occupied home purchase loan application is submitted, the financing institution makes one of several decisions:

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

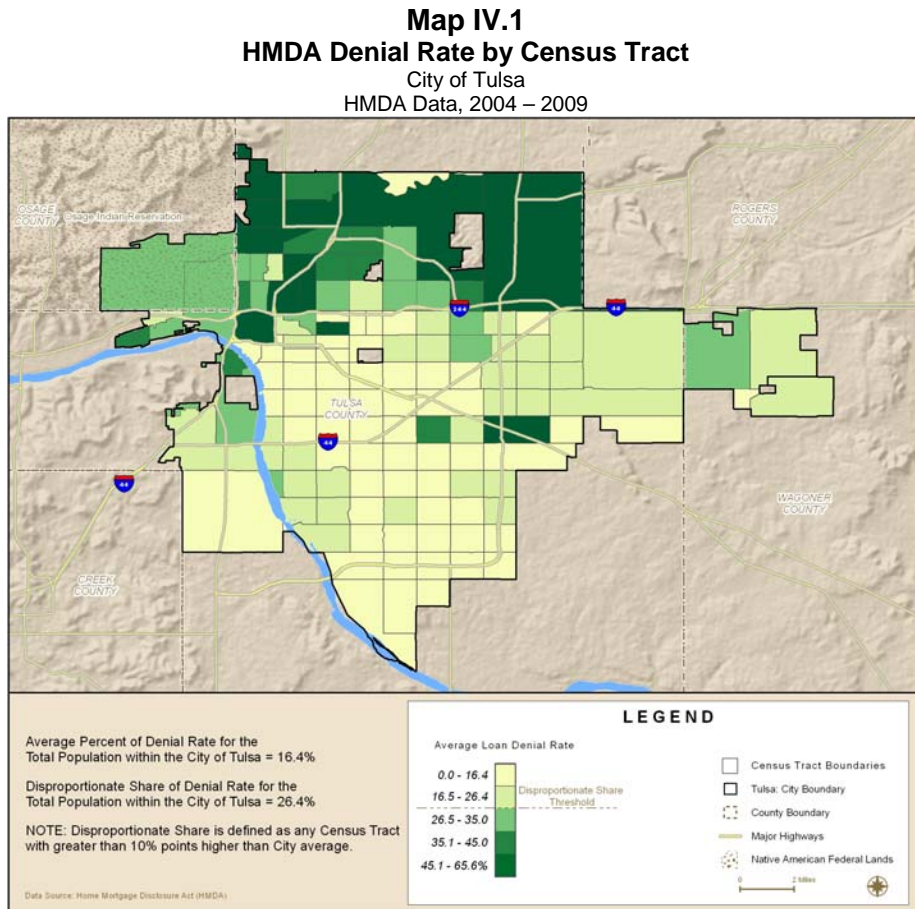
These outcomes were used to determine denial rates presented herein. For this analysis, only loan originations and loan denials were inspected as an indicator of the underlying success or failure of home purchase loan applicants. Altogether, there were 38,457 loan originations and 7,568 applications denied for an average six-year denial rate of 16.4 percent, as seen in Table IV.3.

Table IV.3							
Owner Occupied Home Purchase Loan Applications by Action Taken							
City of Tulsa HMDA Data							
Action	2004	2005	2006	2007	2008	2009	Total
Loan Originated	6,343	7,600	7,837	6,528	4,983	5,166	38,457
Application Approved but not Accepted	872	943	918	611	344	253	3,941
Application Denied	1,540	1,802	1,701	1,103	764	658	7,568
Application Withdrawn by Applicant	680	1,213	1,044	513	502	565	4,517
File Closed for Incompleteness	203	270	262	179	95	120	1,129
Loan Purchased by the Institution	2,802	3,643	4,408	3,590	2,540	2,989	19,972
Preapproval Request Denied	0	66	0	0	2	8	76
Preapproval Approved but not Accepted	0	0	0	0	1	0	1
Total	12,440	15,537	16,170	12,524	9,231	9,759	75,661
Denial Rate	19.5%	19.2%	17.8%	14.5%	13.3%	11.3%	16.4%

Denial rates varied by year, as seen in Diagram IV.1 on the following page. In general, the number of loans denied in the City of Tulsa decreased between 2004 and 2009, and in this six-year time period denial rates fell from 19.5 percent in 2004 to 11.3 percent in 2009.



Importantly, denial rates were not evenly distributed throughout the city. As shown in Map IV.1, below, numerous census tracts in Tulsa had denial rates well above the city average of 16.4 percent. Most tracts with significantly high denial rates were located in the northern part of the city.



HMDA data were also used to determine denial rates by gender. Table IV.4 shows that in those applications in which gender was provided by the applicant, denial rates were uneven with females experiencing higher denial rates as compared to males. On average, between 2004 and 2009 male applicants experienced a denial rate of 14.9 percent while female applicants experienced a denial rate of 17.8 percent. However, female denial rates declined more sharply during this time from 21.4 percent to 11.7 percent or by 9.7 percentage points while male denial rates only declined by 7.0 percentage points or from 17.5 percent to 10.5 percent.

Table IV.4					
Denial Rate for Owner Occupied Home Purchase Loan Applications by Gender					
City of Tulsa HMDA Data					
Year	Male	Female	Not Provided by Applicant	Not Applicable	Total
2004	17.5%	21.4%	41.2%	0.0%	19.5%
2005	17.4%	21.2%	32.6%	0.0%	19.2%
2006	15.9%	19.7%	38.2%	20.0%	17.8%
2007	13.3%	15.2%	29.3%	0.0%	14.5%
2008	12.2%	13.9%	32.5%	9.1%	13.3%
2009	10.5%	11.7%	26.6%	0.0%	11.3%
Total	14.9%	17.8%	33.9%	7.1%	16.4%

Denial rates were calculated by race and ethnicity of the loan applicants as well and these data are presented in Table IV.5. As shown therein, most minority racial and ethnic applicants had higher denial rates than white applicants. Black applicants had the highest denial rate in this time period at 31.0 percent, followed by American Indian or Alaskan Native applicants at 17.2 percent.

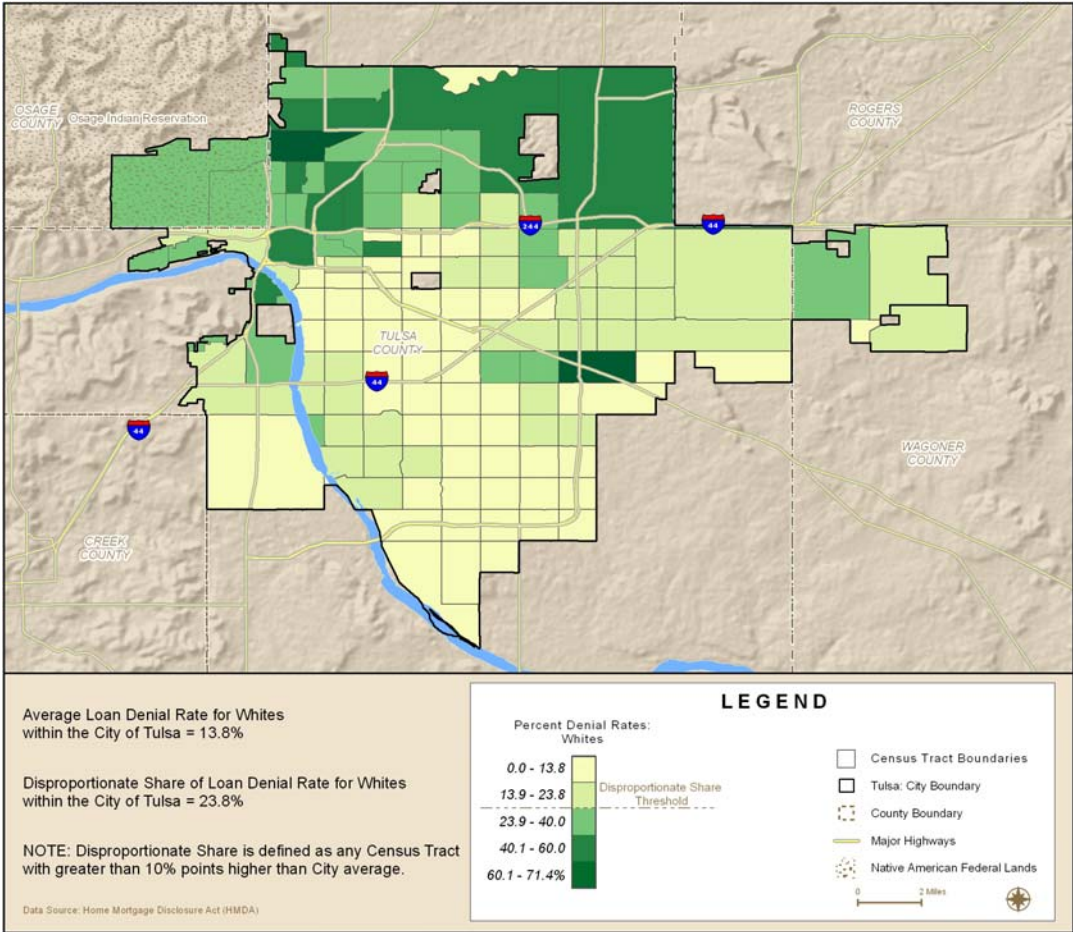
Table IV.5							
Percent Denial Rates by Race							
City of Tulsa HMDA Data							
Race	2004	2005	2006	2007	2008	2009	Total
American Indian or Alaskan Native	24.5%	22.8%	17.3%	14.2%	15.9%	8.4%	17.2%
Asian	11.9%	23.0%	13.9%	14.2%	16.2%	15.8%	15.8%
Black	31.0%	35.3%	34.0%	29.5%	21.9%	24.7%	31.0%
White	16.8%	15.3%	15.1%	12.2%	11.5%	9.8%	13.8%
Not Applicable	32.7%	37.4%	25.9%	22.0%	23.7%	18.7%	27.7%
No Co-Applicant	16.7%	0.0%	0.0%	0.0%	0.0%	0.0%	10.5%
Total	19.5%	19.2%	17.8%	14.5%	13.3%	11.3%	16.4%

As presented in Table IV.6, on the following page, Hispanic applicants experienced denial rates of 23.2 percent compared to a 15.9 percent denial rate for non-Hispanic persons.

Table IV.6 Percent Denial Rates by Ethnicity City of Tulsa HMDA Data							
Ethnicity	2004	2005	2006	2007	2008	2009	Total
Hispanic	22.3%	27.2%	24.1%	17.2%	25.5%	19.5%	23.2%
Non-Hispanic	19.3%	18.4%	17.3%	14.3%	12.6%	10.8%	15.9%
Total	19.5%	19.2%	17.8%	14.5%	13.3%	11.3%	16.4%

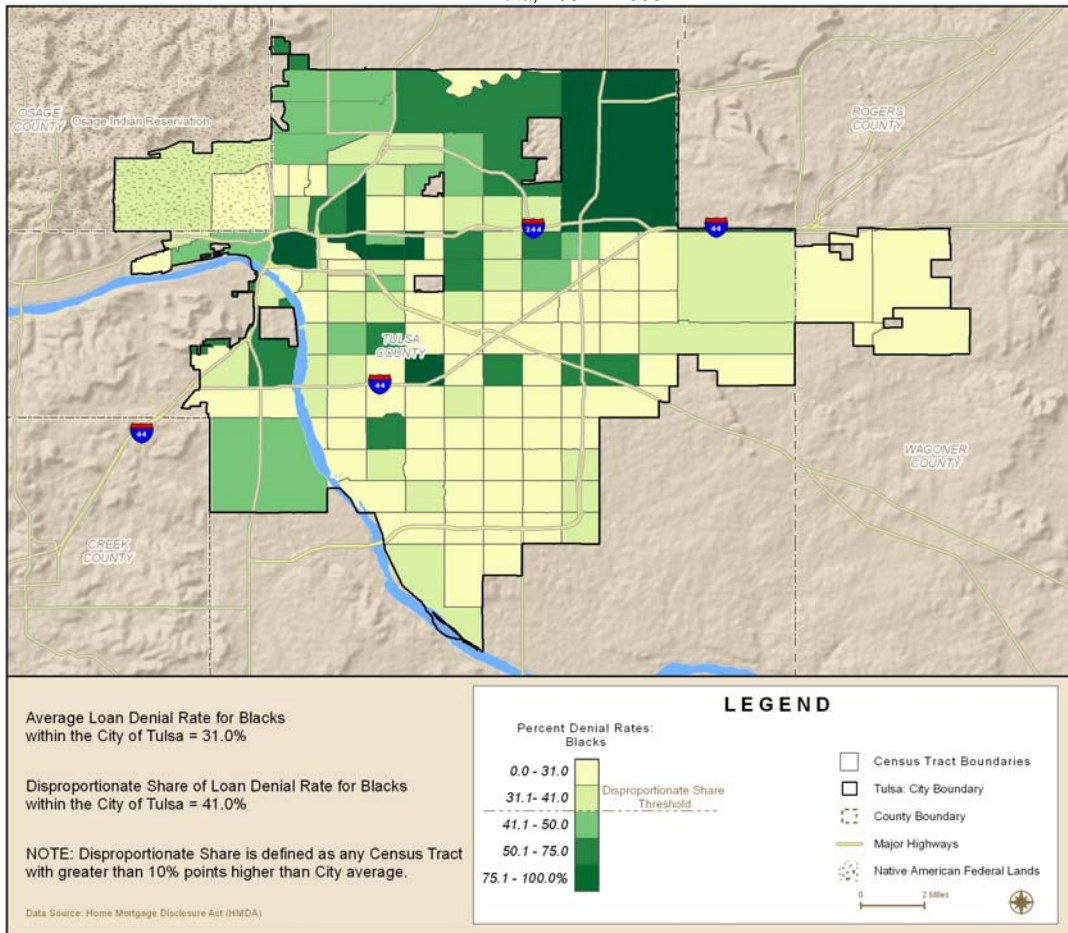
Denial rates by race and ethnicity were plotted on a map to examine geographic location of loan denials. For example, Map IV.2, below, presents home loan application denial rates in Tulsa for white applicants and shows that some areas of the city experienced denial rates well above the jurisdiction average of 13.8 percent. In fact, some census tracts in the northwestern and south central parts of the city showed a concentration of denial rates in excess of 60.0 percent.

Map IV.2
Denial Rate for White Applicants by Census Tract
City of Tulsa
HMDA Data, 2004 – 2009



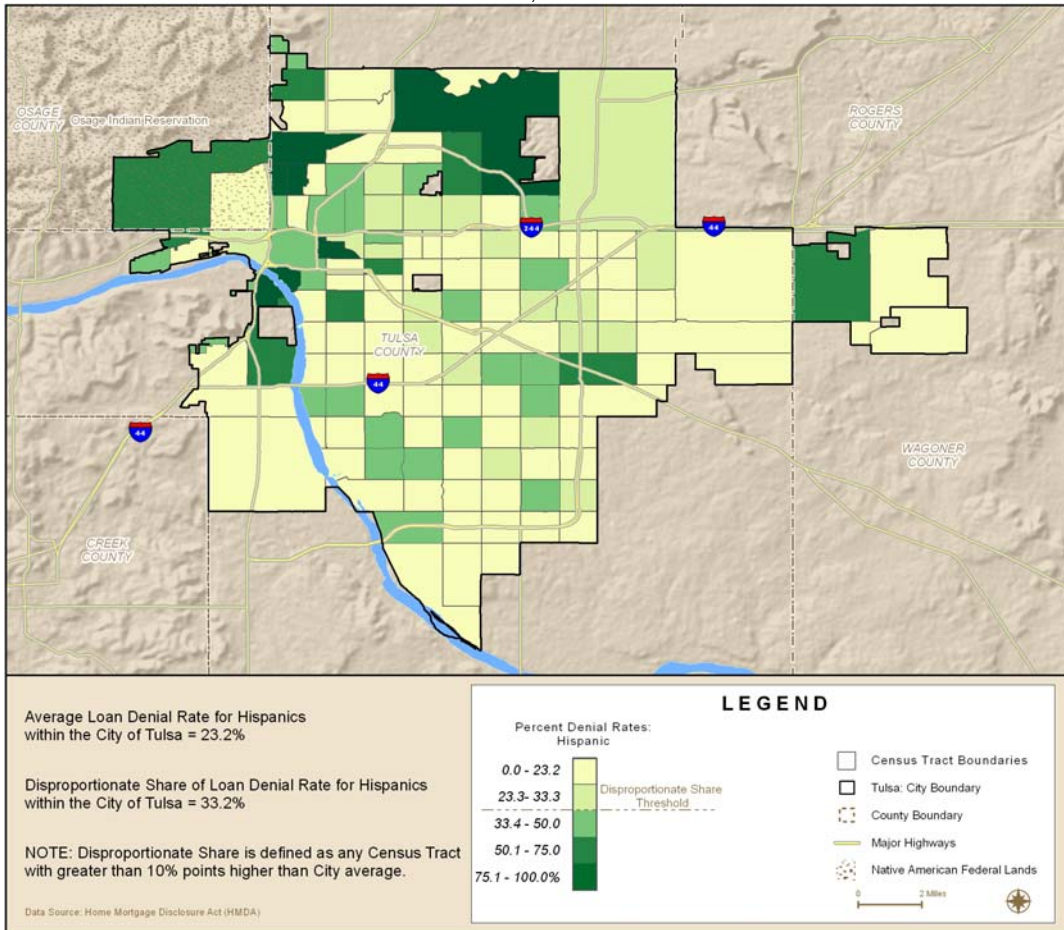
Map IV.3 presents the geographic distribution of HMDA denial rates for black applicants. Denial rates for this group were as high as 100.0 percent, but this high rate can be representative of few applicants, all of whom are denied. Regardless, the areas with higher denial rates for black applicants were mostly located in the northern half of the city.

Map IV.3
Denial Rate for Black Applicants by Census Tract
 City of Tulsa
 HMDA Data, 2004 – 2009



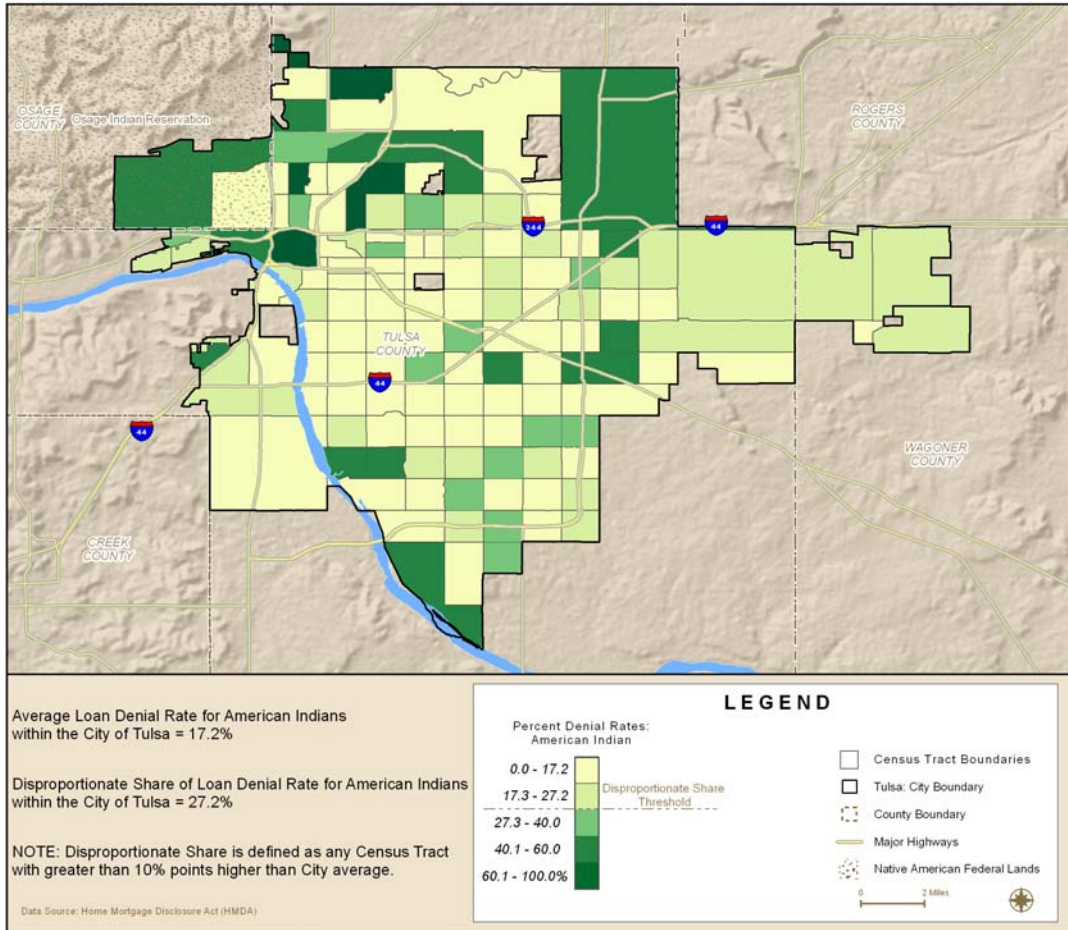
Map IV.4 presents geographic data on denial rates for Hispanic applicants in Tulsa. A number of census tracts dispersed throughout the city demonstrated denial rates in excess of 75.1 percent.

Map IV.4
Denial Rate for Hispanic Applicants by Census Tract
 City of Tulsa
 HMDA Data, 2004 – 2009



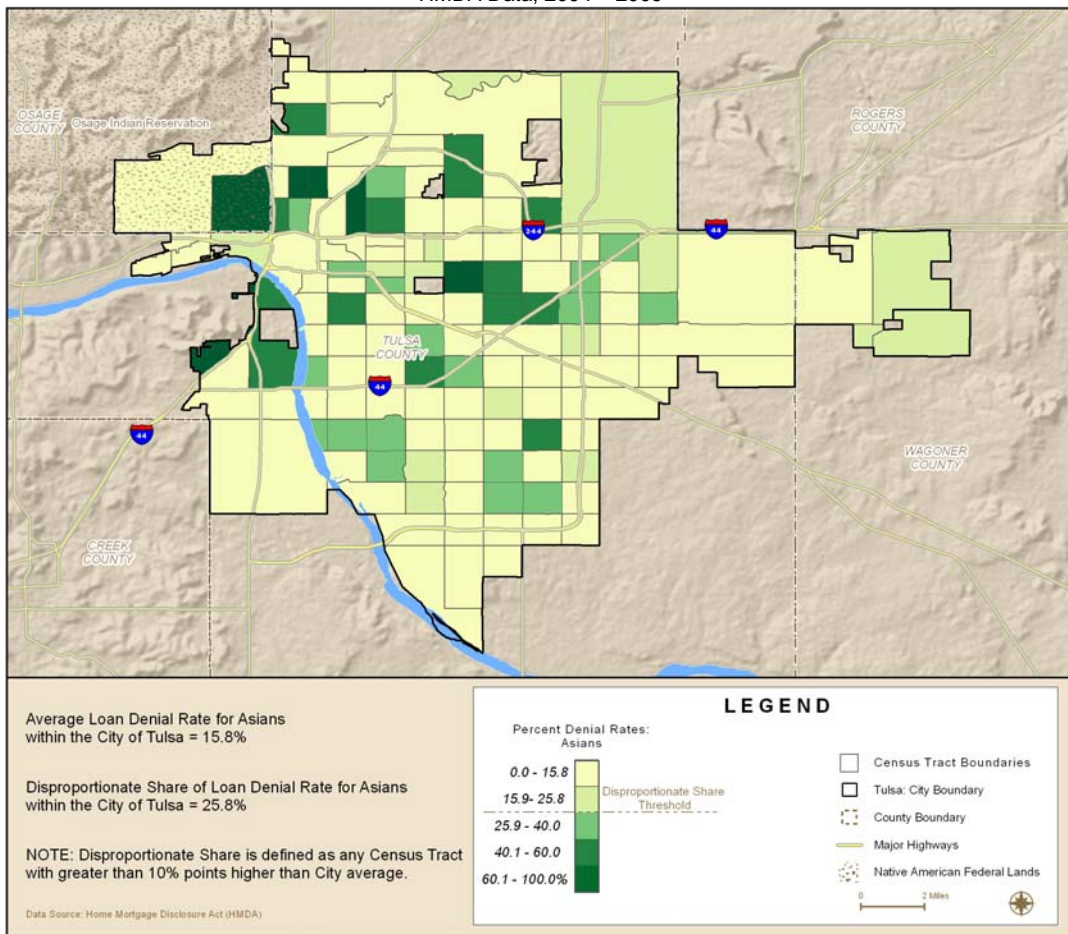
Map IV.5 presents geographic data on denial rates for Native American applicants in Tulsa. Some census tracts throughout the city exhibited denial rates above the city average for this population of 17.2 percent.

Map IV.5
Denial Rate for American Indian Applicants by Census Tract
 City of Tulsa
 HMDA Data, 2004 – 2009



Data regarding denial rates for Asian applicants are presented in Map IV.6 and show that census tracts throughout the city had denial rates as high as 100.0 percent. Although, again this finding may represent a situation of very few applicants in the census tract, all of whom were denied.

Map IV.6
Denial Rate for Asian Applicants by Census Tract
 City of Tulsa
 HMDA Data, 2004 – 2009



Part of the HMDA data includes information about the reason for the loan denial, although financial institutions are not uniformly required to fill out this field. Nevertheless, the most frequently cited categories of denials were credit history and debt-to-income ratio, as shown in Table IV.7. However, it cannot be conclusively stated from these data alone that discriminatory lending in the home purchase market occurred, only that there is an institutional inequity in these denial rates. This problem could potentially be reduced through enhancing programs for consumers to better understand the importance of establishing good credit.

Denial Reason	2004	2005	2006	2007	2008	2009	Total
Debt-to-income Ratio	155	138	171	130	108	101	803
Employment History	31	28	40	38	24	25	186
Credit History	344	375	311	262	176	153	1,621
Collateral	87	105	93	71	60	59	475
Insufficient Cash	41	33	21	31	22	23	171
Unverifiable Information	56	73	81	38	31	20	299
Credit Application Incomplete	100	127	128	100	52	31	538
Mortgage Insurance Denied	1	0	1	1	4	6	13
Other	250	444	309	122	64	35	1,224
Missing	475	479	546	310	223	205	2,238
Total	1,540	1,802	1,701	1,103	764	658	7,568

Table IV.8 shows denial rates by income for Tulsa. As one might expect, households with lower incomes tended to be denied for loans more often. Households with income from \$15,000 to \$30,000 were denied an average of 27.2 percent of the time, but those with incomes above \$75,000 were denied only 8.7 percent of the time on average.

Income	2004	2005	2006	2007	2008	2009	Total
<= \$15K	53.7%	55.3%	41.5%	48.0%	38.2%	54.5%	49.3%
\$15K - \$30K	28.5%	32.2%	31.6%	21.8%	21.7%	18.3%	27.2%
\$30K - \$45K	21.3%	22.2%	20.7%	17.7%	15.5%	12.3%	18.9%
\$45K - \$60K	19.9%	16.8%	17.3%	13.6%	13.8%	9.6%	15.7%
\$60K - \$75K	13.4%	12.5%	13.2%	12.3%	10.8%	9.1%	12.1%
Above \$75K	8.7%	9.3%	9.2%	8.3%	8.4%	7.8%	8.7%
Data Missing	23.3%	21.4%	19.5%	27.4%	12.6%	11.7%	20.4%
Total	19.5%	19.2%	17.8%	14.5%	13.3%	11.3%	16.4%

Table IV.9 presents denial rates segmented by race or ethnicity and income. Even when correcting for income, minority racial and ethnic applicants faced a much higher loan denial rate than whites. For example, black applicants experienced much higher loan denial rates than white applicants across all income levels; at income levels below \$15,000 black applicants had a denial rate of 53.8 percent compared to a white denial rate of 44.8 percent, and at incomes over \$75,000 black applicants had a denial rate of 23.8 percent compared to 7.4 percent for white applicants.

Table IV.9								
Percent Denial Rates of Owner Occupied Home Purchase Loans by Race by Income								
City of Tulsa								
HMDA Data, 2004 – 2009								
Race	<= \$15K	\$15K - \$30K	\$30K - \$45K	\$45K - \$60K	\$60K - \$75K	Above \$75K	Data Missing	Total
American Indian or Alaskan Native	63.2%	28.6%	18.5%	14.2%	13.9%	6.8%	13.3%	17.2%
Asian	40.0%	23.5%	13.9%	14.8%	10.8%	12.9%	25.5%	15.8%
Black	53.8%	40.0%	30.6%	24.9%	22.2%	23.8%	28.3%	31.0%
White	44.8%	23.0%	16.2%	13.9%	10.2%	7.4%	16.4%	13.8%
Not Applicable	67.2%	42.6%	30.9%	24.8%	21.4%	15.8%	41.9%	27.7%
No Co-Applicant	0.0%	27.3%	28.6%	20.0%	0.0%	0.0%	0.0%	10.5%
Total	49.3%	27.2%	18.9%	15.7%	12.1%	8.7%	20.4%	16.4%

In terms of ethnicity, Hispanic applicants were also seen to have experienced higher denial rates as compared to non-Hispanic applicants in all income groups except for those earning \$15,000 to \$30,000. These data are presented below in Table IV.10.

Table IV.10								
Percent Denial Rates of Owner Occupied Home Purchase Loans by Ethnicity by Income								
City of Tulsa								
HMDA Data, 2004 – 2009								
Ethnicity	<= \$15K	\$15K - \$30K	\$30K - \$45K	\$45K - \$60K	\$60K - \$75K	Above \$75K	Data Missing	Total
Hispanic	55.8%	24.8%	23.1%	24.4%	17.5%	13.1%	21.4%	23.2%
Non-Hispanic	48.2%	27.6%	18.5%	15.1%	11.8%	8.5%	20.3%	20.4%
Total	49.3%	27.2%	18.9%	15.7%	12.1%	8.7%	20.4%	16.4%

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

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

Originated owner-occupied home purchase loans qualifying as HALs were identified for 2004 through 2009. These high interest loans were considered predatory in nature. Table IV.11 shows that between 2004 and 2009 there were 6,625 owner-occupied HALs originated in the city. Fortunately, the number of HALs decreased significantly after 2005 and by 2009 the overall rate of HALs was low at 5.4 percent.

Table IV.11							
Originated Owner-Occupied Loans by Loan Purpose by Predatory Status							
City of Tulsa HMDA Data							
Loan Type	2004	2005	2006	2007	2008	2009	Total
Other Originated	5,266	5,668	5,862	5,641	4,506	4,889	31,832
High APR Loan	1,077	1,932	1,975	887	477	277	6,625
Total	6,343	7,600	7,837	6,528	4,983	5,166	38,457
Percent High APR	17.0%	25.4%	25.2%	13.6%	9.6%	5.4%	17.2%

Still, this figure is a measure of the city's underlying foreclosure risk, and it is important to examine characteristics of those householders who purchased these HALs in the city over the six-year time period.

As shown in Table IV.12, below, the group with the greatest number of HALs in this time period was white applicants with 4,729 such loans. Black applicants had 948 home purchase HALs and American Indian applicants had 198 HALs, while Asian applicants had 135 HAL loans. Fortunately, the number of HALs decreased each year for most racial groups.

Table IV.12							
Owner-Occupied Home Purchase HALs Originated by Race							
City of Tulsa HMDA Data							
Race	2004	2005	2006	2007	2008	2009	Total
American Indian	34	63	45	29	18	9	198
Asian	20	31	43	17	14	10	135
Black or African American	190	282	294	126	44	12	948
White	740	1,374	1,382	629	370	234	4,729
Not Applicable	91	182	210	86	27	10	606
No Co-Applicant	2	0	1	0	4	2	9
Total	1,077	1,932	1,975	887	477	277	6,625

Hispanic applicants were shown to have received a fairly high number of HALs. As shown in Table IV.13, on the following page, Hispanic applicants received a total of 740 HAL-type loans over the six-year period. As was shown in the data regarding the frequency of HALs for racial groups, the number of HAL type loans received decreased each year to a low of only 20 such loans in 2009.

Table IV.13							
Owner-Occupied Home Purchase HALs Originated by Race							
City of Tulsa HMDA Data							
Ethnicity	2004	2005	2006	2007	2008	2009	Total
Hispanic	111	205	253	117	34	20	740
Non-Hispanic	966	1,727	1,722	770	443	220	5,885
Total	1,077	1,932	1,975	887	477	277	6,625

On the other hand, further evaluation of the HMDA data revealed that an unusually high *proportion* of HALs was made to black applicants, as shown in Table IV.14. In total, 39.3 percent of all loans taken by black applicants were HALs. Interestingly though, both American Indian and Asian applicants had a lower proportion of HALs as compared to white applicants, 14.5 percent and 14.0 percent compared with 15.3 percent, respectively.

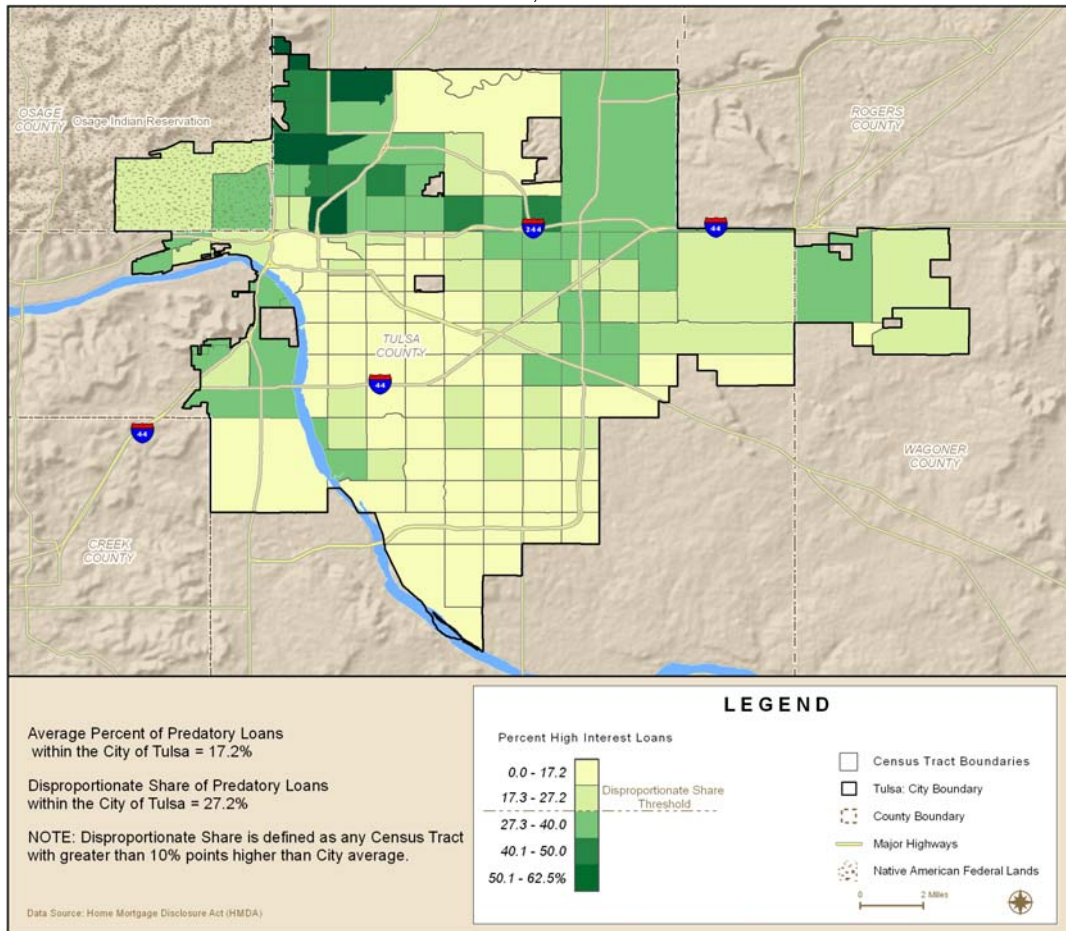
Table IV.14							
Percent of Predatory Owner-Occupied Home Purchase Loans Originated by Race							
City of Tulsa HMDA Data							
Ethnicity	2004	2005	2006	2007	2008	2009	Total
American Indian	16.5%	28.3%	17.4%	13.3%	9.0%	3.4%	14.5%
Asian	12.8%	21.1%	21.1%	9.7%	10.0%	7.2%	14.0%
Black or African American	40.2%	54.4%	56.2%	31.0%	15.2%	5.9%	39.3%
White	14.7%	22.1%	22.7%	12.0%	9.2%	5.6%	15.3%
Not Applicable	20.0%	37.7%	28.0%	17.8%	8.9%	2.7%	21.3%
No Co-Applicant	6.7%	0.0%	25.0%	0.0%	50.0%	33.3%	17.6%
Total	17.0%	25.4%	25.2%	13.6%	9.6%	5.4%	17.2%

Unfortunately, Hispanic applicants also experienced a significantly high rate of HALs. Nearly one in three loans issued to a Hispanic applicant qualified as a high interest rate loan, although again, the portion of these loans decreased greatly over the time period. These data are presented below in Table IV.15.

Table IV.15							
Percent of Predatory Owner-Occupied Home Purchase Loans Originated by Ethnicity							
City of Tulsa HMDA Data							
Race	2004	2005	2006	2007	2008	2009	Total
Hispanic	24.3%	36.7%	42.8%	31.1%	14.0%	7.4%	29.7%
Non-Hispanic	16.4%	24.5%	23.8%	12.5%	9.3%	5.2%	16.4%
Total	17.0%	25.4%	25.2%	13.6%	9.6%	5.4%	17.2%

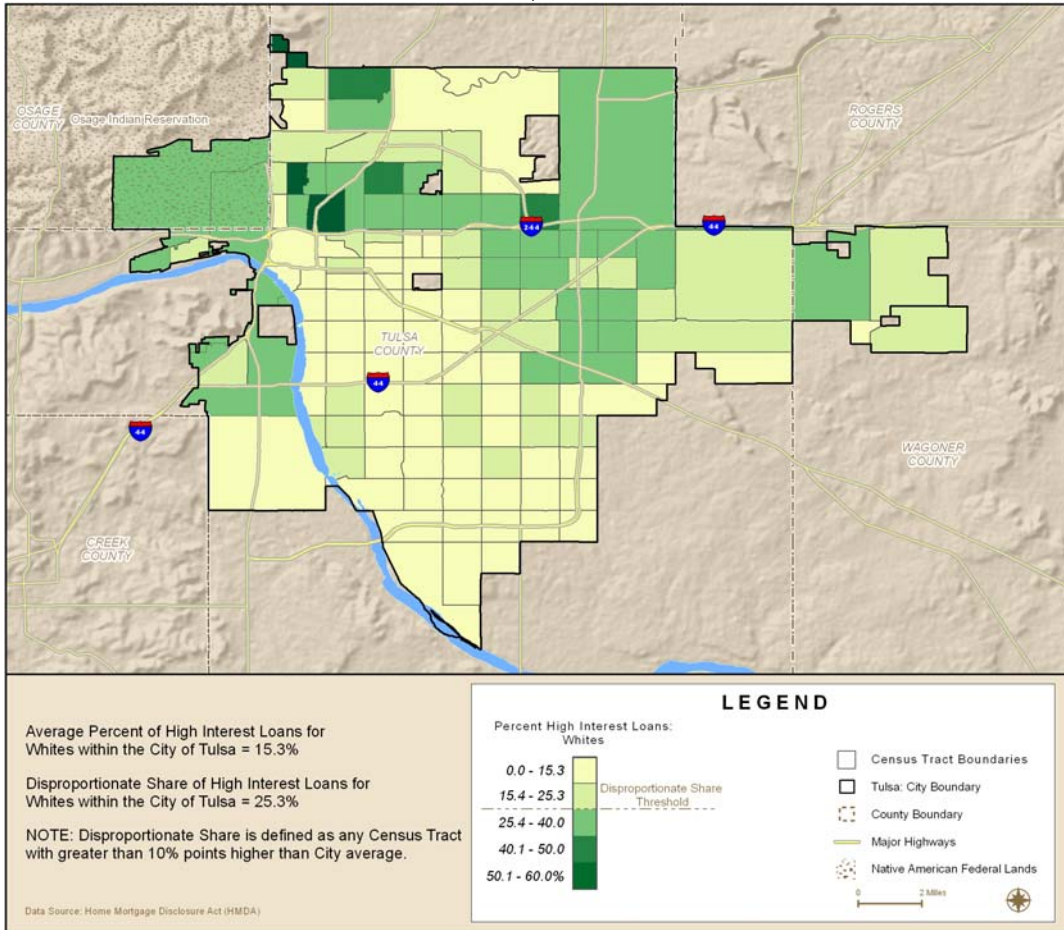
The location of these high interest rate loans was also evaluated as part of the AI process to determine if these loans were most commonly issued in certain areas of the city. Map IV.7, below, shows that HAL-type loans were most common in the northwestern parts of the city. In the census tracts colored in the darkest shade of green, HAL rates were as high as 62.5 percent.

Map IV.7
Rate of HAL Loans by Census Tract
 City of Tulsa
 HMDA Data, 2004 – 2009



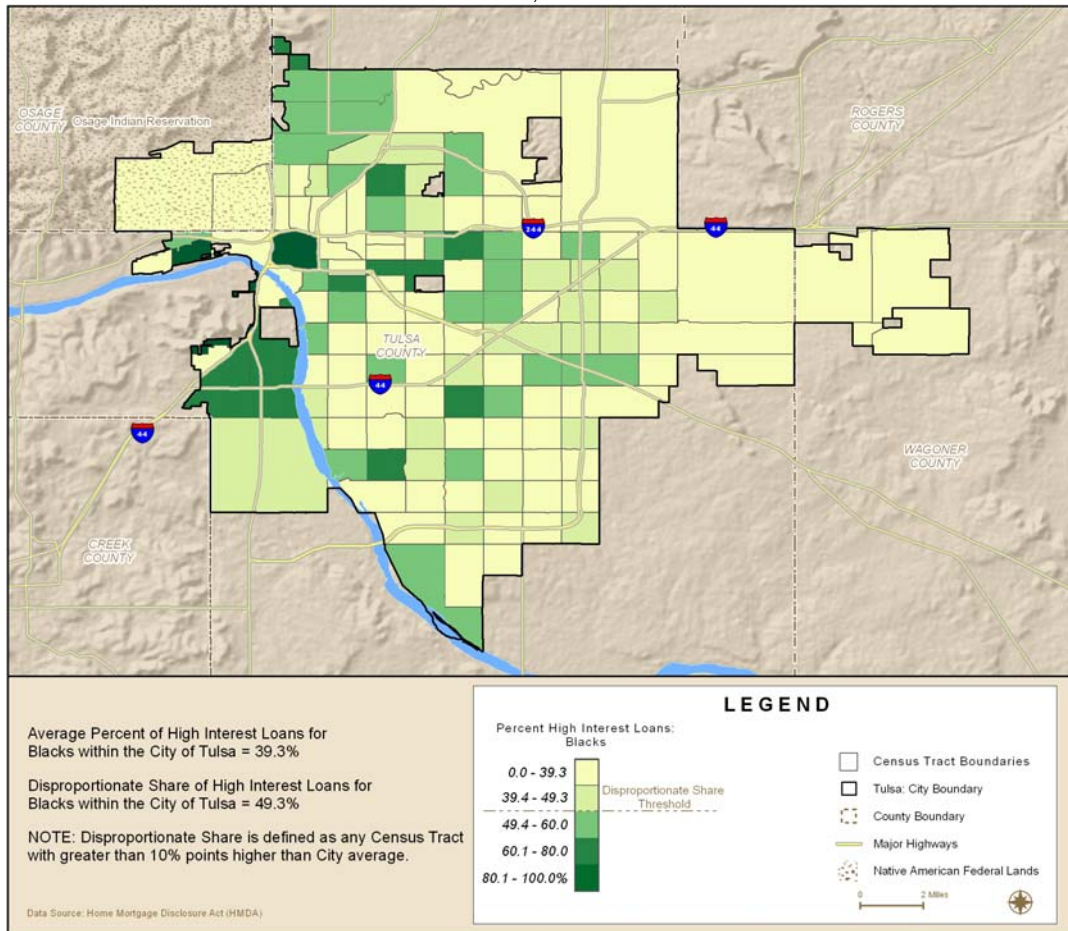
Map IV.8, below, presents the rate of HALs for white applicants. Areas with higher HAL rates were spread throughout the northern half of the city, and some census tracts with the highest rates were grouped in the northwestern part of the city.

Map IV.8
Rate of HAL Loans for White Applicants by Census Tract
 City of Tulsa
 HMDA Data, 2004 – 2009



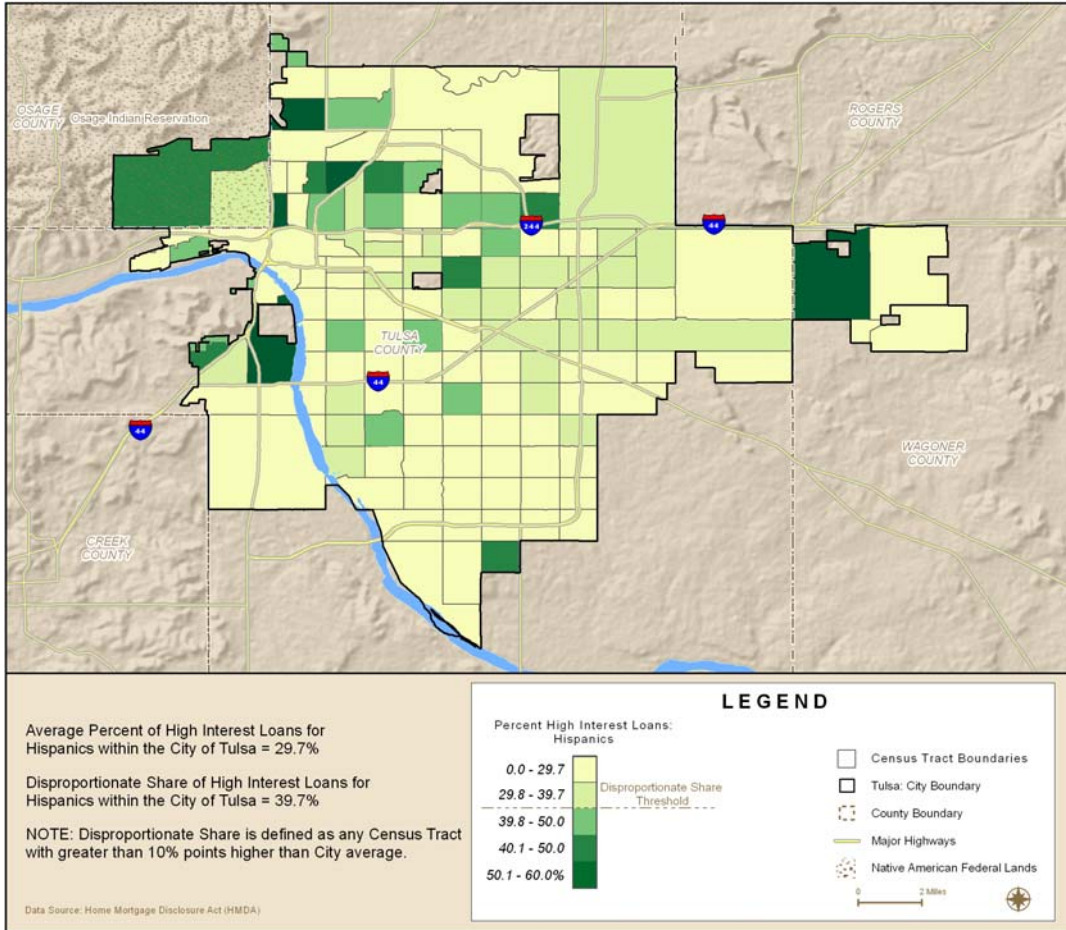
Map IV.9 presents the dispersal of HAL-type loans for black applicants in the city. HALs for black applicants were not specifically concentrated, but were mostly located in the western half of the city. However, some census tracts showed a HAL rate as high as 100.0 percent for black applicants. It must be noted that, as with the overall loan denial maps, these high percentages may represent a very small number of loans that were all categorized as HALs.

Map IV.9
Rate of HALs for Black Applicants by Census Tract
 City of Tulsa
 HMDA Data, 2004 – 2009



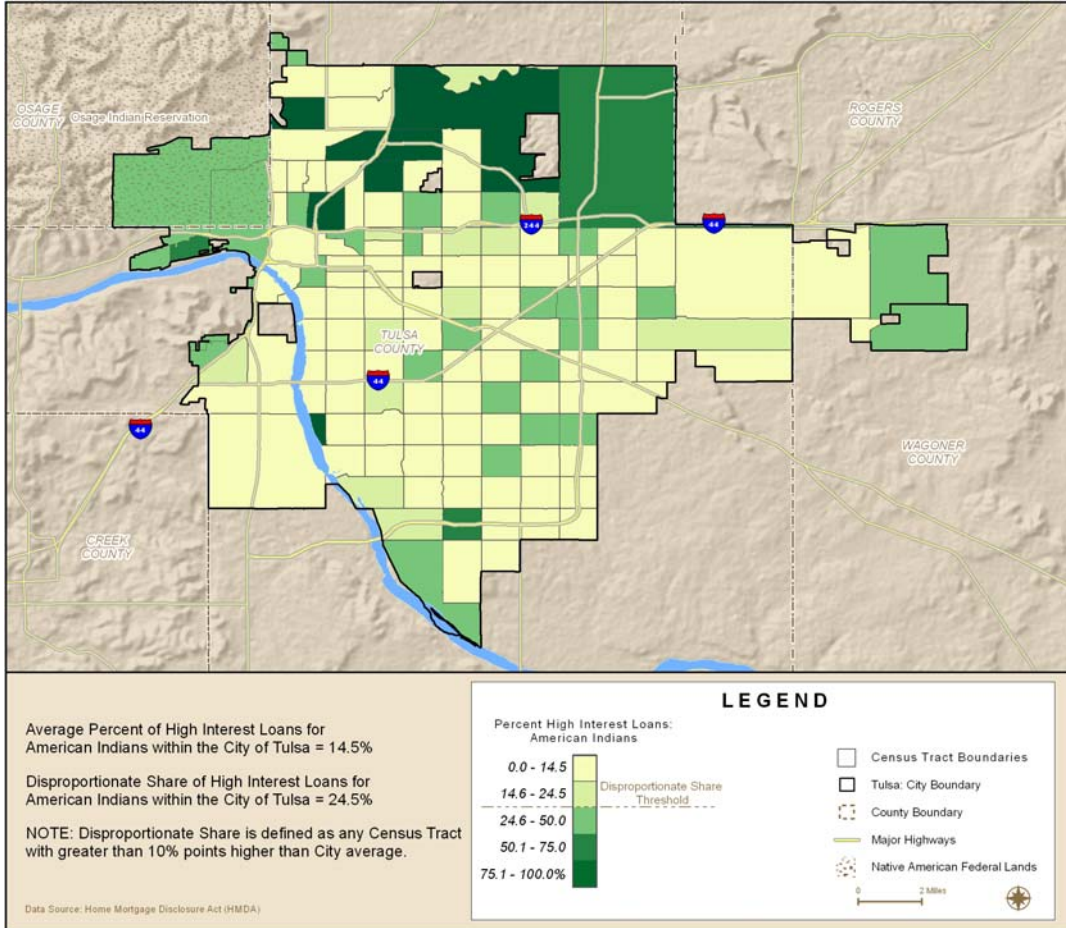
The concentration of HAL-type loans for Hispanic applicants is shown in Map IV.10. While some census tracts were shown to have a HAL rate as high as 60.0 percent, they were spread throughout the city in the western and eastern portions.

Map IV.10
Rate of HALs for Hispanic Applicants by Census Tract
 City of Tulsa
 HMDA Data, 2004 – 2009



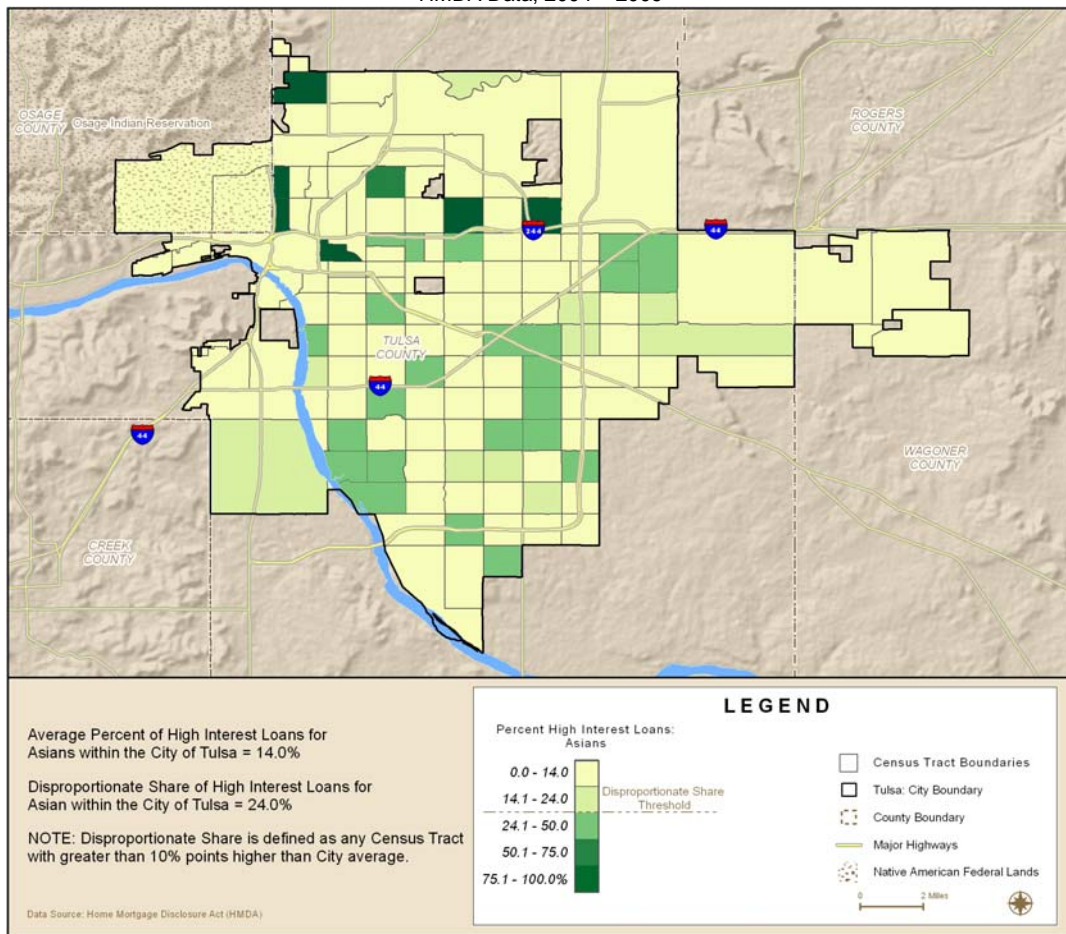
Map IV.11 presents the HAL concentrations for American Indian applicants. Again, some census tracts showed a very high percentage of HALs, but they were not concentrated in any certain part of the city.

Map IV.11
Rate of HALs for American Indian Applicants by Census Tract
 City of Tulsa
 HMDA Data, 2004 – 2009



HAL rates for Asian applicants are presented in Map IV.12. As was shown with the previous HAL maps, some census tracts were noted to have high percentages of HALS, but they were not groups in any particular part of the city and they may only represent a small number of loans given to this group.

Map IV.12
Rate of HALs for Asian Applicants by Census Tract
 City of Tulsa
 HMDA Data, 2004 – 2009



It must be reiterated that these findings do not conclusively prove that predatory lending targeted selected racial and ethnic minorities in the city, but only suggest that such inequitable shares should be of concern to Tulsa lenders, policy makers and city leaders alike.

FAIR HOUSING COMPLAINTS

COMPLAINTS FILED WITH HUD

HUD maintains records of all complaints filed with the agency that represent violations of federal housing law. Over the 2004 through 2010 time period, HUD reported a total of 125 fair housing complaints from within the city with a high of 31 in 2004 and a low of one in 2010. These data are presented in Table IV.16, at right.

Table IV.17 presents the complaint data by basis or the protected class status of the person alleged to have been aggrieved in the complaint. Complainants may cite more than one basis; hence the number of bases cited can exceed the total number of complaints. As shown therein, a total of 158 bases were cited in relation to the 125 complaints filed. The majority of the complaints were filed on the basis of disability with 66 of the 158 bases cited referring to this class. An additional 57 complaints were filed on the basis of race, 12 were filed on the basis of family status, and eight were filed on the basis of retaliation.

Year	Complaints
2004	31
2005	22
2006	18
2007	18
2008	18
2009	17
2010	1
Total	125

Basis	2004	2005	2006	2007	2008	2009	2010	Total
Disability	13	12	12	10	9	10	.	66
Race	15	11	8	8	8	6	1	57
Family Status	5	.	.	.	2	5	.	12
Retaliation	.	5	1	2	.	.	.	8
Sex	2	.	1	1	1	.	.	5
Harassment	1	.	1	1	.	.	.	3
National Origin	1	.	.	1	.	1	.	3
Religion	2	1	3
Other Origin	1	1
Color	0
Total Basis	40	29	23	23	20	22	1	158
Total Complaints	31	22	18	18	18	17	1	125

The issue, or alleged discriminatory action, that was related to each complaint is presented in Table IV.18, on the following page; in the same way that bases are reported, more than one issue may be counted per each complaint. In this case, 207 issues were cited with discrimination in terms, conditions, privileges or services and facilities cited 63 times, discrimination in terms/conditions/privilege relating to rental cited 44 times and failure to make reasonable accommodation cited 29 times. Out of the top six most commonly cited issues, three related specifically to rental transactions, which suggests that discriminatory acts leading to the filing of fair housing complaints are more commonly associated with the rental market.

Table IV.18
Fair Housing Complaints by Issue
City of Tulsa
HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	Total
Discriminatory terms, conditions, privileges, or services and facilities	11	6	11	10	11	13	1	63
Discrimination in terms/conditions/privileges relating to rental	12	14	6	7	4	1	.	44
Failure to make reasonable accommodation	7	7	6	3	4	2	.	29
Discriminatory refusal to rent and negotiate for rental	4	.	1	3	5	7	.	20
Discriminatory acts under Section 818 (coercion, Etc.)	5	5	1	3	1	1	.	16
Discriminatory refusal to rent	2	3	1	2	3	3	.	14
Failure to permit reasonable modification	2	1	1	4
Discrimination in the terms/conditions for making loans	.	1	.	.	1	.	.	2
Discriminatory advertising, statements and notices	.	2	2
Discriminatory financing (includes real estate transactions)	1	1	2
Otherwise deny or make housing available	.	.	1	1	.	.	.	2
Other discriminatory acts	1	.	.	1	.	.	.	2
Discriminatory refusal to negotiate for rental	.	.	.	1	.	.	.	1
Discrimination in the making of loans	1	.	1
Discrimination in terms/conditions/privileges relating to sale	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
False denial or representation of availability	.	.	.	1	.	.	.	1
Non-compliance with design and construction requirements (handicap)	1	.	1
Total Issues	46	41	29	32	29	29	1	207
Total Complaints	31	22	18	18	18	17	1	125

Housing complaints filed with HUD can also be examined by closure status. Of the 125 total complaints, the majority of the complaints, 61, were found to have a no cause determination. However, an additional 34 complaints were successfully conciliated or settled and nine complaints were withdrawn by the complainant after resolution was reached. These data are presented below in Table IV.19.

Table IV.19
Fair Housing Complaints by Closure
City of Tulsa
HUD Data

Closure	2004	2005	2006	2007	2008	2009	2010	Total
No cause determination	12	9	11	11	8	10	.	61
Conciliation/settlement successful	12	6	3	2	6	4	1	34
Complainant failed to cooperate	3	2	.	2	2	1	.	10
Complaint withdrawn by complainant after resolution	.	3	3	2	1	.	.	9
Dismissed for lack of jurisdiction	1	.	.	.	1	2	.	4
Complaint withdrawn by complainant without resolution	2	.	.	1	.	.	.	3
Unable to locate complainant	1	1	1	3
FHAP judicial consent order	.	1	1
Total	31	22	18	18	18	17	1	125

Table IV.20, on the following page, shows that of the 34 complaints that were found to be with cause, 22 were related to disability and 12 were related to race with the few remaining complaints spread across several bases.

Table IV.20								
Fair Housing Complaints Found With Cause by Basis								
City of Tulsa HUD Data								
Basis	2004	2005	2006	2007	2008	2009	2010	Total
Disability	7	4	3	2	4	2	.	22
Race	4	3	1	.	2	1	1	12
Retaliation	.	1	.	1	.	.	.	2
Family Status	1	.	.	1
National Origin	1	.	1
Other Origin	1	1
Religion	1	1
Total Basis	13	8	4	3	7	4	1	40
Total Complaints	12	6	3	2	6	4	1	34

Table IV.21 shows the successful complaints separated by issue. Again, discriminatory terms, conditions, privileges, or services and facilities as well as discrimination in terms/conditions/privileges relating to rental and failure to make reasonable accommodation were cited most commonly.

Table IV.21									
Fair Housing Complaints Found to be With Cause by Issue									
City of Tulsa HUD Data									
Issue	2004	2005	2006	2007	2008	2009	2010	Total	
Discriminatory terms, conditions, privileges, or services and facilities	4	2	2	1	3	3	1	16	
Discrimination in terms/conditions/privileges relating to rental	4	4	1	1	3	.	.	13	
Failure to make reasonable accommodation	4	3	1	2	2	1	.	13	
Discriminatory acts under Section 818 (coercion, Etc.)	2	1	.	1	.	.	.	4	
Discriminatory refusal to rent and negotiate for rental	2	.	.	.	1	.	.	3	
Discriminatory refusal to rent	1	1	2	
Non-compliance with design and construction requirements (handicap)	1	.	1	
Failure to permit reasonable modification	1	1	
Total Issues	18	11	4	5	9	5	1	53	
Total Complaints	12	6	3	2	6	4	1	34	

COMPLAINTS FILED WITH THE TULSA HUMAN RIGHTS DEPARTMENT

The Tulsa Human Rights Department also accepts complaints from within the city that are in relation to violations of federal or state fair housing laws. Complaint data from 2004 through 2010 are presented at right in Table IV.22.

In total, 29 complaints were filed with this agency in the seven-year time period with the number of complaints increasing in the last three years.

Contrary to what was shown in the HUD data, race was most commonly cited for the complaints in this time period, followed by disability, family status and sex. These data are presented on the following page in Table IV.23.

Table IV.22	
Fair Housing Complaints	
City of Tulsa HRD Data	
Year	Total
2004	5
2005	4
2006	.
2007	.
2008	6
2009	4
2010	10
Total	29

Table IV.23 Fair Housing Complaints by Basis City of Tulsa HRD Data								
Basis	2004	2005	2006	2007	2008	2009	2010	Total
Race	5	4	.	.	2	2	2	15
Disability	4	2	5	11
Family Status	3	2	5
Sex	1	1
Total Basis	9	4	.	.	6	4	9	32
Total Complaints	5	4	.	.	6	4	10	29

While the HRD did not provide information about the issue in relation to the complaints filed, they did provide the closure status. Table IV.24 shows that the majority of the complaints, 19, were dismissed or found to have no probable cause. An additional seven complaints were referred to HUD due to lack of administrative resources and one complaint was resolved, one was resolved with mediation and one was settled with mediation.

Table IV.24 Fair Housing Complaints by Closure City of Tulsa HRD Data								
Closure	2004	2005	2006	2007	2008	2009	2010	Total
Dismissed	5	2	.	.	3	2	.	12
No probable cause	.	2	.	.	1	1	3	7
Referral	1	.	6	7
Resolved	1	.	.	1
Resolved / mediated	1	.	1
Settlement / mediated	1	1
Total	5	4	0	0	6	4	10	29

The two complaints that were successfully resolved were filed in 2008 and 2009 and were related to race and disability, as shown below in Table IV.25.

Table IV.25 Fair Housing Complaints Found With Cause by Basis City of Tulsa HRD Data			
Basis	2008	2009	Total
Race	.	1	1
Disability	1	.	1
Total Basis	1	1	2
Total Complaints	1	1	2

Additionally, the HRD provided information about the type of complaint. Table IV.26, on the following page, shows that the two complaints that were found to be with cause were both related to the rental market with one associated with an apartment and the other associated with a rental house.

Table IV.26			
Fair Housing Complaints Found With Cause by Type of Complaint			
City of Tulsa HRD Data			
Type	2008	2009	Total
Apartment	1	.	1
Rent House	.	1	1
Total Types	1	1	2
Total Complaints	1	1	2

INTAKE CALLS FILED WITH METROPOLITAN FAIR HOUSING COUNCIL OF OKLAHOMA

Some data on intake calls related to fair housing concerns were received from Metropolitan Fair Housing Council of Oklahoma (MFHCO). A total of 188 concerns were reported to this agency from within the City of Tulsa from 2006 through January 2011. Table IV.27, shown below, presents these concerns by basis and illustrates that 72 of the 188 intake records counted in the data set indicated a basis. The most common bases cited in the MFHCO data were disability with 42 bases, family status with 20 bases, national origin with seven bases and race or color with three bases.

Table IV.27							
Fair Housing Concerns by Basis							
City of Tulsa MFHCO Data							
Basis	2006	2007	2008	2009	2010	1/2011	Total
Disability	.	6	8	9	19	.	42
Family Status	.	3	4	4	9	.	20
National Origin	.	.	.	7	.	.	7
Race or Color	.	.	2	.	1	.	3
Total Basis	.	9	14	20	29	.	72
Total Complaints	1	38	51	45	51	2	188

Table IV.28, displayed on the following page, presents the outcomes related to the intake records. In this case, more outcomes were recorded than the total number of records, which suggests that more than one outcome is associated with some of the concerns. Most concerns, 86 in total, were found to be related to a landlord/tenant issue, and in more than 25 instances, the client was counseled on housing rights. Only 16 of the records show that the situation resulted in a complaint being filed with HUD. The additional concerns reported to MFHCO related to a number of different outcomes including conciliation by MFHCO, testing that showed unfair treatment, referred to attorney and case resolved to benefit client.

Outcome	2006	2007	2008	2009	2010	1/2011	Total
Landlord/Tenant Problem	1	28	36	21	.	.	86
Counseled Client on Housing Rights	.	.	.	2	22	2	26
HUD 903 Filed	.	.	2	3	11	.	16
Obtained Safe Affordable Housing	.	.	.	1	11	2	14
Invest./No Evidence	12	.	12
Conciliated by MFHC	.	.	3	4	3	.	10
Case Closed w/ Advice	9	.	9
Testing Indicates Unfair Treatment	4	.	4
Other	.	1	1	2	.	.	4
Lost Interest/Contact	.	.	.	1	2	.	3
Retained Safe Affordable Housing	3	.	3
Referred to Attorney	2	.	2
Case Resolved to Benefit Client	2	.	2
Conciliated by OHRC	1	.	1
Total Concerns	1	29	42	34	82	4	192
Total Complaints	1	38	51	45	51	2	188

DISCRIMINATION IN RENTAL ADVERTISING

Housing discrimination in the rental markets can also be examined through the prevalence of discriminatory advertising for rental properties. As established previously, according to federal law it is illegal to prohibit sale, lease, rental, assignment, or sublease based on familial status, sex, national origin, color, religion, disability, or race and state law includes the additional class of age. Consequently, it is also illegal to directly or indirectly advertise that the sale, lease, rental, assignment or sublease of housing is unwelcome or objectionable for any of the aforementioned protected classes. This law does have an exception regarding sex in that an individual may advertise that they prefer a male or female renter if they reside in the dwelling or the dwelling permits no more than two families living independently. There is also an exception for housing that is designated for seniors; it is not illegal to advertise that potential tenants must be above a certain age if the housing is specifically designated for seniors.

In order to examine the prevalence of discrimination in advertising for rental housing, a sample of advertisements was gathered from the Craigslist website. This website allows rental management companies and individuals to post advertisements for rental units. Two types of rental advertisements are posted: apartments and homes and rooms or shared living quarters.

All advertisements posted on sequential Mondays in February 2011 were inspected for preferential phrasing or possible discriminatory language. A total of 543 separate advertisements were examined including 516 advertisements for apartments or housing and 27 for rooms or shared living quarters. Advertisements were posted by both management companies and individuals. Table IV.29, at right, shows the number and type of listing for the city.

Houses/Apartments	Rooms/Shared	Total
516	27	543

As shown in Table IV.30, sixteen advertisements in total demonstrated preferential phrasing. In the housing and apartments section, five had questionable phrasing regarding familial status. These advertisements stated tenant preferences such as “strictly adults,” “single person only” and “no more than three people.”

Of the 27 advertisements listing rooms or shared living quarters for rent, five listed a preference for a female and one listed a preference for a male, but, as explained above, this type of preference statement most likely represents the exception to the rule. However, two advertisements addressed a religion preference and two addressed preferred familial status; one of these advertisements stated explicitly that couples or families would not be considered.

Table IV.30		
Advertisements with Legal and Illegal Preferences		
City of Tulsa		
Craigslist, February 2011		
	Housing/Apartments	Rooms/Shared
Female	1	5
Male	0	1
Religion	0	2
Familial Status	5	2

Pets are mentioned often in housing advertisements. While it is legal for advertisements to note a pet policy, individuals with service animals may not be aware that housing advertised as “no pets” must allow services animals. If an individual with a service animal does not know their rights, it may hinder their ability to find housing. In total, 48 advertisements were posted indicating that “no pets” were allowed, which equates to nearly 10.0 percent of the sample. These data are presented in Table IV.31, below.

Table IV.31		
Advertised Pet Policies		
City of Tulsa		
Craigslist, February 2011		
	No Pets	Pets
Houses/Apartments	41	355
Rooms/Shared	7	8
Total	48	363

Only 1.2 percent of advertisements demonstrated preference in the housing/apartments listings, but 37.0 percent of listings in the rooms/shared living quarters showed preference. Because most of the listings for apartments and homes were posted by large leasing companies that list multi-family units and only a small number of discriminatory advertisements were found in this data set, these findings suggest that these larger leasing establishments are aware of fair housing laws and do not advertise in a discriminatory manner. However, some questionable phrasing was found in the rooms or shared living quarters rental section, and these advertisements appeared to be mostly posted by individuals or small property managers rather than large management companies. Subsequently, housing providers with only a few units or persons offering just a room for rent may benefit from additional education on fair housing laws.

FAIR HOUSING SURVEY – PRIVATE SECTOR RESULTS

Additional evaluation of fair housing within the City of Tulsa was conducted via a survey of stakeholders in the city. The purpose of the 2011 Tulsa fair housing survey, a relatively more 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. Results and comments related to questions regarding fair housing in the private sector are presented below, and additional survey results are discussed in Sections V and VI.

Over 160 people in the city completed the survey, which was conducted mostly 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. While the numerical tallies of results are presented in this section along with summaries of some comment-driven questions, a complete listing of written responses is available in Appendix E of this report.

FAIR HOUSING IN THE PRIVATE SECTOR

In order to address perceptions of fair housing in 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 affirmatively 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 IV.32, below.

Table IV.32					
Fair Housing in the Private Sector					
City of Tulsa					
2011 Tulsa Fair Housing Survey					
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?	43	49	22	52	166
The real estate industry?	35	49	27	55	166
The mortgage and home lending industry?	33	43	33	57	166
The housing construction or accessible housing design fields?	13	44	49	60	166
The home insurance industry?	26	44	40	56	166
The home appraisal industry?	19	48	41	58	166
Any other housing services?	14	46	50	56	166

Rental Housing

In regard to questionable practices or barriers to fair housing choice in the rental housing market, a total of 43 respondents noted that they were aware of fair housing issues in this area. This suggests that, of those who answered the question, 37.7 percent showed awareness of possible discrimination in the rental market.

As indicated previously, respondents were also asked to discuss these questionable practices or barriers specifically in narrative format. Comments were then synthesized and a number of common themes were discovered. These comments are presented below.

- Preferences are stated in advertising of rental units and reporting on availability of rental units. Minorities interested in available rental units are told the unit has been rented, or are not called back, while whites are told units are available and offered tours.
- Landlords and property managers refuse to rent based on race and ethnicity as well as national origin and familial status.
- Discriminatory terms and conditions are made such as raising the price, requiring excessive deposits, or setting higher income requirements for minorities and families with children.

Real Estate Industry

In regard to questionable practices or barriers to fair housing choice in the real estate industry, a total of 35 respondents noted that they were aware of fair housing issues in this area. This suggests that, of those who answered the question, nearly 31.5 percent showed awareness of possible discrimination in the real estate industry.

As indicated previously, respondents were also asked to discuss these questionable practices or barriers specifically in narrative format. Comments were then synthesized and a number of common themes were discovered. These comments are presented below.

- Homebuyers are steered to buy homes in different areas of the city based on race or ethnicity.
- Many potential buyers are directed away from North Tulsa.

Mortgage and Home Lending Industry

In regard to questionable practices or barriers to fair housing choice in the mortgage and home lending industry, a total of 33 respondents noted that they were aware of fair housing issues in this area. This suggests that, of those who answered the question, nearly 30.3 percent showed awareness of possible discrimination in the mortgage and home lending industry.

As indicated previously, respondents were also asked to discuss these questionable practices or barriers specifically in narrative format. Comments were then synthesized and a number of common themes were discovered. These comments are presented below.

- It is difficult to obtain residential or commercial loans for parts of North Tulsa.

- Minorities are charged higher interest rates.
- Redlining occurs in that lenders will not issue loans to certain parts of the city or areas with high concentration of minorities.
- Minorities are steered towards sub-prime or predatory loans.

Housing Construction or Accessible Housing Design Fields

In regard to questionable practices or barriers to fair housing choice in housing construction or accessible housing design fields a total of 13 respondents noted that they were aware of fair housing issues in this area. This suggests that, of those who answered the question, only 12.3 percent showed awareness of possible discrimination in the housing construction or accessible housing design fields.

As indicated previously, respondents were also asked to discuss these questionable practices or barriers specifically in narrative format. Comments were then synthesized and a number of common themes were discovered. These comments are presented below.

- Many apartment complexes built within the last decade do not meet accessibility compliance.
- Construction companies do not post the required fair housing posters at job sites.

Home Insurance Industry

In regard to questionable practices or barriers to fair housing choice in the home insurance industry, a total of 26 respondents noted that they were aware of fair housing issues in this area. This suggests that, of those who answered the question, nearly 23.6 percent showed awareness of possible discrimination in the home insurance industry.

As indicated previously, respondents were also asked to discuss these questionable practices or barriers specifically in narrative format. Comments were then synthesized and a number of common themes were discovered. These comments are presented below.

- Minorities are charged higher insurance rates.
- Inflated insurance prices are a problem along with an inability to insure or inadequate coverage for certain areas of town.
- Redlining occurs based on zip codes.

Home Appraisal Industry

In regard to questionable practices or barriers to fair housing choice in the home appraisal industry, a total of 19 respondents noted that they were aware of fair housing issues in this area. This suggests that, of those who answered the question, only 17.6 percent showed awareness of possible discrimination in the home appraisal industry.

As indicated previously, respondents were also asked to discuss these questionable practices or barriers specifically in narrative format. Comments were then synthesized and a number of common themes were discovered. These comments are presented below.

- Nearby comparable properties used in the appraisal limit the amount someone can borrow. Racial minorities are concentrated in poor neighborhoods and may not be able to get loans based on the comparable properties listed in the appraisal.
- Appraisals are deflated or inequitable in North Tulsa.
- Appraisals in minority areas lose value or rise slower than non-minority areas.

Any Other Housing Services

Respondents were also asked to discuss their awareness of barriers to fair housing in any other area of the private housing sector. Fourteen respondents noted that they were aware of issues in other housing services; this total represented 12.7 percent of those who answered this question. Some respondents did note other issues in areas such as businesses charging more for housing repairs in North Tulsa.

SUMMARY

Home Mortgage Disclosure Act (HMDA) data were used to analyze differences in denial rates in the city by race, ethnicity, gender, income and census tract. Evaluated home purchase loan applications from 2004 through 2009 showed that there were 38,457 loan originations and 7,568 loan denials, for an average six-year loan denial rate of 16.4 percent. These HMDA data also showed that American Indian, black and Hispanic applicants experienced significantly higher rates of loan denials than white or Asian applicants, even after correcting for income. Further, these highly denied racial and ethnic groups appear to have been disproportionately impacted in some geographic areas of the city, primarily in North Tulsa, where denial rates at times exceeded 80.0 percent. Analysis of high annual percentage rate loans (HALs) showed that the black and Hispanic populations were also disproportionately impacted by an unusually higher share of these lower-quality and potentially predatory loans and therefore may be more likely to carry a larger burden of foreclosure.

Fair housing complaint data was collected from HUD and the Tulsa Human Rights Department. Data from these sources showed that more than 120 complaints were filed in the city from 2004 through 2010. The protected classes appearing to be disproportionately impacted by discrimination in rental markets were disability and race, and the common complaint issues related to discriminatory terms, conditions, privileges, or services and facilities, especially relating to the rental market, as well as failure to make reasonable accommodation. Intake data from Metropolitan Fair Housing Council of Oklahoma showed similar frequent bases.

A review of Craigslist postings for a sample of days in February 2011 also revealed instances of poor language choices in advertisements in the rental market with preferential statements made based on age, family status and religion. These statements may be construed as discriminatory preferences in advertising of housing.

Results from the fair housing survey that was conducted as part of the AI process showed that many respondents see possible issues of housing discrimination in Tulsa's private housing sector. In the rental market, preferences in rental advertising, refusal to rent, and discriminatory

terms and conditions made were identified as possible barriers to fair housing. In the real estate market, respondents noted that steering activities occur, and in the home purchase markets, redlining and predatory lending were noted to be concerns. Redlining was also noted to be a barrier to fair housing in the insurance industry along with inflated insurance prices.

SECTION V. FAIR HOUSING IN THE PUBLIC SECTOR

While the previous section presented information about the status of fair housing in the private sector, such as in the rental and lending markets, this section will focus specifically on the fair housing situation in the public sector. HUD recommends that the AI investigate a number of areas within the public housing sector including health and safety codes and construction standards, zoning and land use policies, tax policies, and development standards. The AI should also examine access to government services as well as possible issues with any local housing authorities. These areas were examined through the use of a fair housing survey.

FAIR HOUSING SURVEY – PUBLIC SECTOR RESULTS

Additional evaluation of fair housing within the City of Tulsa was conducted via a survey of stakeholders in the city. The purpose of the 2011 Tulsa fair housing survey, a relatively more 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. Results and comments related to questions regarding fair housing in the private sector are presented below, and additional survey results are discussed in Sections V and VI.

Over 165 persons in the city completed the survey, which was conducted mostly 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. While the numerical tallies of results are presented in this section along with summaries of some comment-driven questions, a complete listing of written responses is available in Appendix E of this report.

FAIR HOUSING IN THE PUBLIC SECTOR

The public housing sector can be fairly complex, so the questions in this section asked respondents to think about possible questionable practices or barriers to fair housing choice within very specific areas of the public housing sector. The list of areas presented for respondents was as follows:

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

If respondents indicated affirmatively 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 V.1, below.

Table V.1					
Fair Housing in the Public Sector					
City of Tulsa					
2011 Tulsa Fair Housing Survey					
Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
Zoning laws?	17	50	37	62	166
Land use policies?	21	45	39	61	166
Occupancy standards or health and safety codes?	20	46	38	62	166
Property tax policies?	13	54	36	63	166
Housing construction standards?	9	51	40	66	166
Neighborhood or community development policies?	29	42	30	65	166
Limited access to government services, such as employment services?	26	49	24	67	166
Compliance issues with any public housing authority?	10	58	35	63	166
Public administrative actions or regulations?	10	37	55	64	166

Zoning Laws

In regard to questionable practices or barriers to fair housing choice in the zoning laws market, a total of 17 respondents noted that they were aware of fair housing issues in this area. This suggests that, of those who answered the question, nearly 16.3 percent showed awareness of possible discrimination in zoning laws.

As indicated previously, respondents were also asked to discuss these questionable practices or barriers specifically in narrative format. Comments were then synthesized and a number of common themes were discovered. These comments are presented below.

- Concentration of multi-family zoning leads to areas with high concentrations of lower income and predominantly minority groups.
- NIMBYism exists in regard to zoning codes for affordable housing or housing complexes.
- Zoning in North Tulsa may be inhibiting commercial development.

Land Use Policies

In regard to questionable practices or barriers to fair housing choice in land use policy, a total of 21 respondents noted that they were aware of fair housing issues in this area. This suggests that, of those who answered the question, nearly 20.0 percent showed awareness of possible discrimination in land use policy.

As indicated previously, respondents were also asked to discuss these questionable practices or barriers specifically in narrative format. Comments were then synthesized and a number of common themes were discovered. These comments are presented below.

- Apartment complexes are distant from employment centers and are inadequately serviced by public transportation.

- Land use policy is drastically different between North and South Tulsa. There is much land in North Tulsa that could be used, but South and East Tulsa are being crowded out.
- There is a lack of explanation of land use policy to citizens, which creates or perpetuates NIMBYism and hinders community development and economic growth.

Occupancy Standards or Health and Safety Codes

In regard to questionable practices or barriers to fair housing choice in occupancy standards or health and safety codes, a total of 20 respondents noted that they were aware of fair housing issues in this area. This suggests that, of those who answered the question, nearly 19.2 percent showed awareness of possible discrimination in occupancy standards or health and safety codes.

As indicated previously, respondents were also asked to discuss these questionable practices or barriers specifically in narrative format. Comments were then synthesized and a number of common themes were discovered. These comments are presented below.

- Local officials do not have enough enforcement staff or power to enforce current codes.

Property Tax Policies

In regard to questionable practices or barriers to fair housing choice in property tax policies, a total of 13 respondents noted that they were aware of fair housing issues in this area. This suggests that, of those who answered the question, nearly 12.6 percent showed awareness of possible discrimination in property tax policies.

As indicated previously, respondents were also asked to discuss these questionable practices or barriers specifically in narrative format. Comments were then synthesized and a number of common themes were discovered. These comments are presented below.

- Although there has been little improvement in North Tulsa, real estate taxes increase there every year.
- Taxes in the north and west are just as high as some areas in the south but these places do not have the same number of services or schools.

Housing Construction Standards

In regard to questionable practices or barriers to fair housing choice in housing construction standards, a total of nine respondents noted that they were aware of fair housing issues in this area. This suggests that, of those who answered the question, only 9.0 percent showed awareness of possible discrimination in housing construction standards.

As indicated previously, respondents were also asked to discuss these questionable practices or barriers specifically in narrative format. Comments were then synthesized and a number of common themes were discovered. These comments are presented below.

- Construction standards differ between North and South Tulsa.

Neighborhood or community development policies

In regard to questionable practices or barriers to fair housing choice in neighborhood or community development policies, a total of 29 respondents noted that they were aware of fair housing issues in this area. This suggests that, of those who answered the question, nearly 28.7 percent showed awareness of possible discrimination in neighborhood or community development policies.

As indicated previously, respondents were also asked to discuss these questionable practices or barriers specifically in narrative format. Comments were then synthesized and a number of common themes were discovered. These comments are presented below.

- There is a lack of community or neighborhood development in North and West Tulsa with most development occurring in South Tulsa.
- Community development has historically been lower in areas heavily populated with minorities.

Limited Access to Government Services

In regard to questionable practices or barriers to fair housing choice in limited access to government services, a total of 26 respondents noted that they were aware of fair housing issues in this area. This suggests that, of those who answered the question, 26.3 percent showed awareness of possible discrimination in access to government services.

As indicated previously, respondents were also asked to discuss these questionable practices or barriers specifically in narrative format. Comments were then synthesized and a number of common themes were discovered. These comments are presented below.

- Lack of access to public transportation in neighborhoods that need it most, especially in North Tulsa.
- Bus lines stop operating in the evening, and have very limited operations on the weekends, which makes public transportation inadequate for a large portion of the working population.
- Language barriers exist in public transportation. Information should also be provided in Spanish.
- Trash service is only once per week in North Tulsa, compared to twice a week in South and West Tulsa.

Compliance Issues with Public Housing Authorities

In regard to questionable practices or barriers to fair housing choice in compliance issues with public housing authorities, a total of 10 respondents noted that they were aware of fair housing issues in this area. This suggests that, of those who answered the question, only 9.7 percent showed awareness of possible discrimination in compliance issues with public housing authorities.

As indicated previously, respondents were also asked to discuss these questionable practices or barriers specifically in narrative format. Comments were then synthesized and a number of common themes were discovered. These comments are presented below.

- Lack of accessibility and accommodation for individuals with disabilities.

Any Other Public Administrative Actions or Regulations

Respondents were also asked to discuss their awareness of barriers to fair housing in any other public administrative actions or regulations. A total of ten respondents answered this question affirmatively. Some respondents did note other issues in areas such as general discrimination against minorities and bureaucratic red tape.

SUMMARY

The status of affirmatively fair housing within Tulsa's public fair housing sector was primarily evaluated through the fair housing survey of stakeholders in the city. Results from the public sector section of the fair housing survey showed that many respondents in Tulsa believe there are questionable practices or policies within the public sector. Most comments portrayed fair housing issues in relationship to problems in existence in North Tulsa. For example, comments suggested possible differences in construction standards between North and South Tulsa, a lack of focus on community development in the north part of the city, and also lack of access to government services including transportation and trash service in North Tulsa. Additional concerns related to a lack of accessibility and accommodation for persons with disabilities within public housing agencies.

SECTION VI. PUBLIC INVOLVEMENT

This section discusses analysis of fair housing in Tulsa as gathered from various public involvement efforts conducted as part of the AI process in the city including additional survey data as well as comments gathered from a series of focus group sessions conducted with stakeholders in the city and feedback collected from public input sessions.

FAIR HOUSING SURVEY

As discussed in previous sections, the 2011 Fair Housing Survey comprised a large portion of the public involvement efforts associated with the development of the Tulsa AI. While data from the survey regarding policies and practices within the private and public sectors in Tulsa have already been discussed, the remaining portions of the survey findings are presented in the narrative below.

Additional evaluation of fair housing within the City of Tulsa was conducted via a survey of stakeholders in the city. The purpose of the 2011 Tulsa fair housing survey, a relatively more 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. Results and comments related to questions regarding fair housing in the private sector are presented below, and additional survey results are discussed in Sections IV and V.

Over 165 persons in the city completed the survey, which was conducted mostly 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. While the numerical tallies of results are presented in this section along with summaries of some comment-driven questions, a complete listing of written responses is available in Appendix E of this report.

Respondents to the fair housing survey were asked to identify their primary role within the housing industry. As shown in Table VI.1, at right, 76 respondents identified themselves as concerned citizens in the city, while 29 respondents were identified as advocates/service providers and an additional 16 respondents were counted as property managers.

Table VI.2, on the following page, shows the responses made to a number of questions regarding federal, state and local fair housing laws. The first question asked respondents to indicate their understanding of the usefulness of fair housing laws in Tulsa. As shown, the majority of respondents answered affirmatively and only 13 respondents said that they did not believe fair housing laws are useful.

Role	Total
Concerned citizen	76
Advocate/Service Provider	29
Property management	16
Local government	15
Real estate	7
Banking/Finance	6
Construction/Development	2
Insurance	1
Other (please specify)	13
Missing	1
Total	166

Respondents were also asked if fair housing laws are difficult to understand or follow. As shown in the same table, roughly an equal number of persons said that fair housing laws were or were not difficult to understand or follow. Such a high response to this question suggests that many persons in Tulsa have a hard time comprehending fair housing laws and that outreach and education efforts may be needed to aid in understanding.

Table VI.2					
Federal, State and Local Fair Housing Laws					
City of Tulsa					
2011 Fair Housing Survey					
Question	Yes	No	Don't Know	Missing	Total
Do you think fair housing laws are useful?	114	13	8	31	166
Are fair housing laws difficult to understand or follow?	57	55	24	30	166
Is there a training process available to learn about fair housing laws?	45	30	.	91	166
Have you participated in fair housing training?	35	43	.	88	166

Accessibility to fair housing training was also examined in the survey. As shown in Table VI.2, 60.0 percent of persons who responded to the question were aware of fair housing training services available to them. This result indicates that the majority of persons are aware of the fair housing training options sponsored by groups such as the Tulsa Area Fair Housing Partnership.

Additionally, respondents were asked to indicate if they personally had participated in fair housing training. Almost 45.0 percent of respondents who answered this question said that they had taken part in some kind of fair housing training in the past. This finding suggests that although existing fair housing agencies and organizations in the city may be offering training opportunities, suppliers and consumers of housing services may not be taking advantage of the educational options that have been made available. A refocusing of these educational and outreach efforts to make them more accessible may be beneficial to affirmatively furthering fair housing in the city. These data are presented in Table VI.2.

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 law on a federal, state and local level. Race and disability were offered as examples of protected classes in the question narrative. Results of this question are presented at right in Table VI.3 and show that while many respondents were able to correctly identify the protected classes of religion, age, gender, national origin, family status, sex, color and ethnicity, comments also included a number of classes that have no such protections including sexual orientation, gang members, drug users, and veterans.

Table VI.3	
Protected Classes	
City of Tulsa	
2011 Fair Housing Survey	
Protected Classes	Total
Religion	41
Age	27
Gender	26
National Origin	23
Familial Status	22
Sex	19
Sexual Orientation	17
Color	12
Marital Status	8
Ethnicity	7
Race	5
Disability	3
Gang Members	3
Drug Users	2
Elderly	2
Gender Orientation	2
Handicap	2
Veteran Status	2
Education	1
Victims of Domestic Violence	1
Other	37
Total	262

Respondents were also asked to indicate their awareness of where to refer persons who wished to file a fair housing complaint. Many respondents suggested appropriate agencies such as HUD or the Department of Human Rights. However, many respondents said that they did not know or suggested less appropriate avenues such as the mayor's office, as shown in Table VI.4, at right.

Table VI.4 Suggested Referral Organizations City of Tulsa 2011 Fair Housing Survey	
Organization	Total
HUD	24
Don't know	23
Department of Human Rights	16
City of Tulsa	15
Mayor	3
Fair Housing Commission	2
NAACP	1
Oklahoma City	1
Other	9
Total	94

Table VI.5 shows the results of questions that addressed fair housing activities in Tulsa. When asked if they were aware of any fair housing testing in the city, respondents mostly indicated that they were not aware of any fair housing testing. Very few persons answered the follow up question which inquired if there is sufficient testing in Tulsa, but most persons who did respond indicated that testing efforts are insufficient. Another question asked if there is sufficient outreach and education activity in the city. A total of 42.1 percent of respondents who answered this question said that these activities are currently insufficient. This finding reinforces the idea that while many groups provide fair housing services to the city, outreach and education efforts are still insufficient.

Table VI.5 Fair Housing Activities in Tulsa City of Tulsa 2011 Fair Housing Survey						
Questions	Yes	No	Don't Know	Missing	Total	
Are you aware of any fair housing testing?	16	68	19	63	166	
	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient testing in Tulsa?	16	3	1	18	128	166
Is there sufficient outreach and education activity in Tulsa?	60	10	2	31	63	166

Table VI.6 shows tallied responses to survey questions related to the state of fair housing in the city. First, respondents were asked if they were aware of a fair housing plan in the city. Very few respondents, only 20 persons total, noted that they were aware of a fair housing plan in Tulsa.

Respondents were also asked to offer information about any specific geographic areas within Tulsa that might have increased fair housing problems. Almost 45.0 percent of respondents who answered this question affirmatively noted that certain geographic areas of the city have fair housing issues. Respondents were also encouraged to list specific areas to which they might be referring. North Tulsa was mentioned numerous times as having fair housing problems such as steering, redlining or other issues negatively effecting minority populations. South Tulsa was mentioned to having barriers against minority populations moving into South Tulsa, along with other discriminatory actions towards minorities.

The effectiveness of fair housing laws in Tulsa was addressed in the final survey question. While fewer respondents chose to answer this question, only a total of 20 respondents indicated that fair housing laws in the city were effective. Respondents were asked to offer

written comments regarding ways that fair housing laws could be changed. Comments focused on the lack of enforcement of fair housing laws.

Table VI.6 State of Fair Housing in Tulsa City of Tulsa 2011 Fair Housing Survey					
Question	Yes	No	Don't Know	Missing	Total
Are you aware of a fair housing plan in Tulsa?	20	64	19	63	166
Are there geographic areas in Tulsa that have fair housing problems?	44	10	44	68	166
Are fair housing laws in Tulsa effective?	20	19	61	66	166

FAIR HOUSING FOCUS GROUPS

In order to gain more of an in-depth perspective into the status of fair housing in the city, a series of fair housing focus groups were held. The purpose of the focus groups was to engage stakeholders from throughout the fair housing arena in focused discussions about possible issues of housing discrimination and how fair housing could be better implemented in Tulsa. The three focus groups were held February 23 and 24, 2011, in the City Hall in Tulsa. Comments from the focus groups are presented in Appendix D of this document, but a summary of points is presented below.

- *There is an overall need for increased fair housing education in Tulsa.*

Comments indicated that there is a lack of fair housing education, especially for housing consumers but also for providers of housing. Comments suggested that the education of the public in fair housing matters should include a focus on renters' rights as well as the complaint process for rental markets, while housing provider education should be geared toward lenders, real estate agents and property managers and focus on fair housing laws and also problems associated with steering and other home purchase issues. It was also suggested that the education efforts to be made should be approachable and involve a situation wherein the education is brought to the people, such as through street fairs or faith-based organizations or community schools, to avoid the expectation that people will seek it out themselves. Additionally, fair housing education in the city needs to be extended beyond only internet endeavors and should utilize cross-cultural communication styles.

Attendants noted that the goal of fair housing education efforts should be a greater understanding of fair housing laws and a lessened fear of reporting fair housing violations.

- *A greater level of fair housing investigation and enforcement activities is needed.*

In order to identify fair housing problems in the city, comments suggested that increased efforts regarding investigation and enforcement are needed throughout Tulsa, but perhaps especially in North Tulsa. These efforts should not only include investigation in relation to complaints that are filed, but also audit testing of suspected discriminatory practices in both the rental and home purchase markets, particularly for

violations of race and disability discrimination. Patrons of housing need to be made aware of the importance of reporting violations of housing to appropriate agencies. Additionally, a greater level of focus should be placed on monitoring violations of health, safety and other codes, specifically within the rental market, where issues such as violations of ADA regulations and failure to hang fair housing posters occurs.

- *Fair housing laws could be improved through a number of revisions.*

Several comments indicated that fair housing laws in the city could be improved through expansion of protected classes. Classes that were noted to need protection under fair housing laws were persons with differing sexual orientation and also persons with felony convictions. Comments indicated that these groups face discrimination in the housing markets but a lack of designation as a protected class means that there are few options for filing complaints.

Some attendants also said that fair housing laws may need to be strengthened to increase regulations for out-of-town investors who create unfavorable living circumstances for tenants. Regulations should focus on unethical leases, prevention of unmaintained property and perpetuated property deterioration, as well as poor management by investors.

- *Historic problems with predatory lending continue to affect minority groups.*

Comments indicated that predatory lending has been a significant fair housing problem historically in Tulsa and that predatory lending continues to be an issue for some minority groups, such as Hispanics, as well as low-income persons and first-time homebuyers. It was also noted that some lending companies have developed business practices that specifically focus on lending to high risk groups and are engaging in “reverse redlining.”

Education was suggested to be a primary means of combating predatory lending, based on comments from the focus groups, and outreach efforts should be aimed at both first-time home buyers as well as real estate agents. The City may wish to encourage borrowers to utilize local lending agencies because these groups have a vested interest in the community. It was also suggested that the City should offer additional aid to try to prevent foreclosure as a result of predatory lending and also to offer resources to persons ill-affected by foreclosure to maintain the physical properties of their homes.

- *Predatory lending in Tulsa has led to a chain reaction of additional fair housing problems.*

While predatory lending issues have improved somewhat in the city, comments suggested that the residual effects of unfair lending practices are still being felt in terms of significant levels of foreclosures, especially in the northern part of the city. The increased number of foreclosures has led to high levels of vacant housing along with dilapidation and blight in North Tulsa. In turn, high levels of vacant housing have created issues of NIMBYism (Not In My Backyard) and resistance to low-income development in other areas of Tulsa as well as steering in the home purchase markets.

- *Disparities between North Tulsa and South Tulsa are increasing over time.*

In addition to increased problems with predatory lending, foreclosures and vacant housing in North Tulsa, this part of the city has additional housing issues. For example, some comments indicated that housing and safety codes are more commonly enforced and upheld in South Tulsa, while areas with higher minority and low-income persons, like North Tulsa, are largely ignored. Additional examples that were provided indicated that similar disparities exist between South Tulsa and North Tulsa in infrastructure, such as road maintenance, as well as services, including trash collection and “dump days.” Some comments also suggested that bankers are now hesitant to invest in North Tulsa and to provide home loans for this area.

Attendants also noted that North Tulsa seems to be passed over on community development opportunities as well as business development including gas stations and grocery stores and that the City needs to do more to better the housing situation in North Tulsa to make it more inhabitable and appealing. Comments suggested that much of the issues of disparity between North and South Tulsa are likely related to the historical context for neighborhood segregation in the city.

FAIR HOUSING FORUMS

A series of public input opportunities, or fair housing forums, were held in the City of Tulsa on April 13 and 14, 2011. The purpose of the forums was to allow the public the chance to learn more about the AI process including why the AI is conducted as well as what preliminary findings were discovered. Comments, including reactions to the initial list of impediments and suggestions for proposed actions, were accepted from anyone in attendance. A summary of comments is presented in Appendix D of this report, but selected comments are presented below.

- Affirmatively furthering fair housing requires the effort of the entire community, not just persons in the industry or city personnel.
- People and groups are hesitant to talk about fair housing problems or issues in the city, and when problems are not discussed, progress cannot be made.
- Enforcement activities have to occur beyond the city level; enforcement efforts have to be spread to state venues of enforcement.
- Several housing programs that were previously in existence in the city, such as Home Ownership Tulsa, were very helpful in improving fair housing in the city, and efforts should be made to re-establish or form similar groups.
- Steering problems in Tulsa can be related to price factors as well as familiarity with markets and businesses.
- Families in rent-to-own situations are not being adequately protected because they have one foot in the door of renting and one foot in the door of homeownership.

SUMMARY

A number of public involvement activities conducted through the AI process, including a fair housing survey, fair housing focus groups, and fair housing forums, provided insight into fair housing issues in the city. Results from the fair housing survey showed that most respondents feel that fair housing laws are useful but that they are difficult to understand or follow; this was reaffirmed by indication of some confusion as to which classes of persons are protected by state and federal laws as well as where to refer someone with a fair housing complaint. Misunderstanding was also shown in comments that included housing production and affordable housing issues as barriers to fair housing choice. Additionally, it was noted that enhanced testing and outreach and education activities may be needed. Comments gathered from housing stakeholders in the city during a series of focus groups demonstrated concerns about: a lack of understanding of fair housing and enforcement of fair housing laws in the city, a high number of predatory loans in the city which have led to further problems of foreclosure and blight, and continued disparities in housing and housing services for North Tulsa. Three fair housing forums, or public input opportunities, were also held in the city, and attendants cited concerns including steering, lack of enforcement of fair housing laws, and a need for greater city-wide commitment to fair housing.

SECTION VII. RESEARCH CONCLUSIONS

Data from the U.S. Census Bureau showed that between 2000 and 2010 the population in the City of Tulsa decreased slightly from 393,049 to 391,906 persons or by 0.3 percent. During this time period, the white population in the city actually declined by more than 10.0 percent while all other racial groups grew in size. Notably, the Hispanic ethnic population almost doubled in size to 55,266 persons. Some racial and ethnic populations, especially black and Hispanic groups, were found to be geographically concentrated in select areas of the city, specifically in North Tulsa, and these concentrations increased from 2000 to 2010. At the time of the 2000 census, the city had a disability rate of 20.5 percent, which was slightly higher than the 19.0 percent national rate. The disabled population was also slightly concentrated in select areas of the city, particularly in the northwestern portion.

Data from the Bureau of Labor Statistics showed that the unemployment rate in Tulsa increased from 3.5 percent in 2008 to 7.1 percent by the end of 2010. The poverty rate average for 2005 through 2009 was 19.0 percent with 71,041 persons considered to be living in poverty, and this group was concentrated primarily in the northern part of the city. Evaluation of the location of job and employment centers in relation to transportation showed that the placement of these services may not be adequately addressing the needs of North Tulsa. Further, analysis of community investment data demonstrated that North Tulsa may not be receiving equitable community business lending.

A review of the fair housing profile in the City of Tulsa revealed that the City has a solid and present fair housing structure. There are several organizations that provide fair housing services, including outreach and education, complaint intake, and testing and enforcement activities, for both providers and consumers of housing. These organizations include the U.S. Department of Housing and Urban Development (HUD), the Oklahoma Human Rights Commission, which exists as a substantially equivalent agency to HUD in the state, the Tulsa Human Rights Department, the Metropolitan Fair Housing Council of Oklahoma, and the Tulsa Fair Housing Partnership. Many of these groups accept fair housing complaints, and the complaint process within these organizations is accessible and straightforward.

Home Mortgage Disclosure Act (HMDA) data, regarding denial rates in the city by race, ethnicity, gender, income and census tract, showed that from 2004 through 2009 there were 38,457 loan originations and 7,568 loan denials for an average six-year loan denial rate of 16.4 percent. HMDA data also showed that American Indian, black and Hispanic applicants experienced significantly higher rates of loan denials than white or Asian applicants, even after correcting for income. Further, these highly denied racial and ethnic groups appear to have been disproportionately impacted in some geographic areas of the city, primarily in North Tulsa, where denial rates at times exceeded 80.0 percent.

Analysis of high annual percentage rate loans (HALs) showed that the black and Hispanic populations were also disproportionately impacted by an unusually higher share of these lower-quality and potentially predatory loans and therefore may be more likely to carry a larger burden of foreclosure.

Fair housing complaint data was collected from HUD and the Tulsa Human Rights Department. Data from these sources showed that more than 125 complaints were filed in the city from 2004 through 2010. The protected classes appearing to be disproportionately impacted by discrimination in rental markets were disability and race, and the most common complaint issues related to discriminatory terms, conditions, privileges, or services and facilities, especially relating to the rental market, as well as failure to make reasonable accommodation. Intake data from Metropolitan Fair Housing Council of Oklahoma showed similar frequent bases.

A review of Craigslist postings for a sample of days in February 2011 revealed instances of poor language choices in advertisements in the rental market with preferential statements made based on age, family status and religion. These statements may be construed as discriminatory preferences in advertising of housing.

Results from a fair housing survey that was conducted as part of the AI process showed that many respondents see possible issues of housing discrimination in Tulsa's private housing sector. In the rental market, preferences in rental advertising, refusal to rent, and discriminatory terms and conditions made were identified as possible barriers to fair housing. In the real estate market, respondents noted that steering activities occur, and in the home purchase markets, redlining and predatory lending were noted to be concerns. Redlining was also noted to be a barrier to fair housing in the insurance industry.

The fair housing survey also examined the public sector and findings showed that many respondents in Tulsa believe there are questionable practices or policies within the public sector. Most comments portrayed fair housing issues in relationship to problems in existence in North Tulsa. For example, comments suggested possible differences in construction standards between North and South Tulsa, a lack of focus on community development in the north part of the city, and also lack of access to government services including transportation and trash service in North Tulsa. Additional concerns related to a lack of accessibility and accommodation for persons with disabilities within public housing agencies.

Additional results from the fair housing survey showed that most respondents feel that fair housing laws are useful but that they are difficult to understand or follow; this was reaffirmed by indication of some confusion as to which classes of persons are protected by state and federal laws as well as where to refer someone with a fair housing complaint. Misunderstanding was also shown in comments that included housing production and affordable housing issues as barriers to fair housing choice. Additionally, it was noted that enhanced testing and outreach and education activities may be needed.

Comments gathered from housing stakeholders in the city during a series of focus groups demonstrated concerns about: a lack of understanding of fair housing and enforcement of fair housing laws in the city, a high number of predatory loans in the city which have led to further problems of foreclosure and blight, and continued disparities in housing and housing services for North Tulsa.

Three fair housing forums, or public input opportunities, were also held in the city, and attendants cited concerns including steering, lack of enforcement of fair housing laws, and a need for greater city-wide commitment to fair housing.

SECTION VIII. IMPEDIMENTS AND SUGGESTED ACTIONS

IMPEDIMENTS TO FAIR HOUSING CHOICE AND SUGGESTED ACTIONS

Provisions to affirmatively furthering fair housing are long-standing components of HUD's housing and community development programs. In exchange for receiving federal funds from HUD, the City certifies that it is affirmatively furthering fair housing. The requirements of such certification comprise the following elements:

1. Conduct an Analysis of Impediments to Fair Housing Choice;
2. Take actions to remedy impediments, if impediments are identified;
3. Maintain records of the analysis and actions taken.

The first element in the certification process noted above has resulted in several impediments to fair housing choice. HUD's definition of an impediment, reprinted here from the *Fair Housing Planning Guide*, page 2-6, that that "Impediments to fair housing choice are:

- 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
- Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin."

While numerous housing issues were uncovered in the process of conducting this AI, only those issues that were shown to qualify as impediments to fair housing choice based on the definition printed immediately above, albeit with the inclusion of the classes protected under Oklahoma state law: age for persons 18 years and older.

These items are listed below for both the private and public housing sectors and are accompanied by specific actions that the City will follow to attempt to remedy these issues.

Impediments to Fair Housing Choice

Private Sector

1. Discriminatory terms, conditions, privileges, or services and facilities in the rental markets
2. Refusal to rent or negotiate for rent
3. Failure to make reasonable accommodation or modification
4. Statement of preferences in advertising for rental properties
5. Steering, redlining, reverse redlining and blockbusting in residential sales
6. Denial of home purchase loans
7. Predatory lending activities
8. Unequal investment of Community Reinvestment Act resources
9. "Not in My Backyard" (NIMBY) tendencies
10. Failure to actively participate in the fair housing system

Public Sector

1. Ineffective fair housing outreach and education efforts
2. Failure to adequately enforce fair housing laws
3. Historical establishment of policies and practices resulting in segregation of minority populations
4. Inequitable community development activities
5. Land use and planning decisions resulting in unequal access to government services such as transportation and trash pickup
6. Failure to provide reasonable accommodation in public housing

Impediments Matrix

A matrix was used to more closely detail the source or sources from which the impediments were derived. Table VIII.1, on the following page, lists the impediments, by private and public sector, and demonstrates which sources supported the issue as an impediment to fair housing choice within the City of Tulsa. The protected classes most often noted to be cited in relation to the impediment have been included along with a ranking of need for action. A notation of “H” indicated a high need for action, “M” suggests a moderate need for action, “L” indicated a low need for action, and “N” specifies that no action is required.

**Table VIII.1
Impediments Matrix
2011 Tulsa, Oklahoma AI**

Impediment	Source										Protected Classes Most Affected	Need for Action
	Census Data	Review of Fair Housing Profile	Literature/Case Review	HMDA Data	Housing Complaint Review	Advertisement Analysis	Fair Housing Survey	Fair Housing Focus Groups	Fair Housing Forums	Other		
Private Sector												
Discriminatory terms, conditions, privileges, or services and facilities in the rental markets					X		X				Race, national origin, disability	H
Refusal to rent or negotiate for rent					X		X				National origin, race, disability	H
Failure to make reasonable accommodation or modification					X						Disability	H
Statement of preferences in advertising for rental properties						X	X				Age, family status, religion	M
Steering, redlining, reverse redlining and blockbusting in residential sales							X				Race, national origin, disability	M
Denial of home purchase loans			X	X			X	X			Race, national origin, sex	M
Predatory lending activities			X	X			X				Race, national origin	H
Unequal investment of Community Reinvestment Act resources	X		X							X	Race, national origin, disability	L
"Not in My Backyard" (NIMBY) tendencies							X				Disability	L
Failure to actively participate in the fair housing system							X		X		All	H
Public Sector												
Ineffective fair housing outreach and education efforts						X	X	X	X		All	H
Failure to adequately enforce fair housing laws							X	X	X		All	H
Historical establishment of policies and practices resulting in segregation of minority populations	X		X				X				Race, national origin, disability	M
Inequitable community development actions							X				Disability, race, national origin	H
Land use and planning decisions resulting in unequal access to government services such as transportation and trash pickup							X	X		X	Race, national origin, disability	H
Failure to provide reasonable accommodation in public housing					X		X				Disability	H

Suggested Actions to Resolve Impediments

The City of Tulsa benefits from a substantive fair housing infrastructure. The City should focus fair housing efforts on continuing current activities as well as including additional efforts and activities as follows:

Private Sector

1. Impediment: Discriminatory terms, conditions, privileges, or services and facilities in the rental markets
Recommended Actions: Conduct testing and enforcement activities; continue to educate landlords and property management companies in fair housing law; continue to educate housing consumers in fair housing rights
2. Impediment: Refusal to rent or negotiate for rent
Recommended Actions: Conduct testing and enforcement activities; continue to educate landlords and property management companies in fair housing law; continue to educate housing consumers in fair housing rights
3. Impediment: Failure to make reasonable accommodation or modification
Recommended Actions: Conduct testing and enforcement activities; hold training sessions to educate housing providers in requirements regarding reasonable accommodation or modification
4. Impediment: Statement of preferences in advertising for rental properties
Recommended Actions: Educate landlords and property management companies in fair housing law
5. Impediment: Steering, redlining, reverse red-lining and blockbusting in residential sales
Recommended Actions: Conduct testing activities to determine the severity of the problem; work to resolve these issues in the real estate industry through education and enforcement
6. Impediment: Denial of home purchase loans
Recommended Actions: Conduct testing activities to determine the severity of the problem; educate buyers through credit counseling and home purchase training
7. Impediment: Predatory lending activities
Recommended Actions: Conduct testing activities to determine the severity of the problem; conduct enforcement activities as needed; educate buyers through credit counseling and home purchase training
8. Impediment: Unequal investment of Community Reinvestment Act resources
Recommended Actions: Monitor Community Reinvestment Act lending practices; advise Bankers' Association of findings, iterate the need for city-wide investment strategies; build vision of citywide investment approach

9. Impediment: “Not in My Backyard” (NIMBY) tendencies
Recommended Actions: Work to promote development of residential housing in North Tulsa and public housing outside of North Tulsa
10. Impediment: Failure to actively participate in the fair housing system
Recommended Actions: Enhance current outreach and education efforts to make fair housing more approachable and accessible for housing consumers

Public Sector

1. Impediment: Ineffective fair housing outreach and education efforts
Recommended Actions: Evaluate current fair housing outreach and education efforts; examine ways in which these activities could be made more effective; implement enhancements
2. Impediment: Failure to adequately enforce fair housing laws
Recommended Actions: Increase the level of monitoring, testing and enforcement of laws related to fair housing; select some testing results for enforcement including conciliation and/or litigation
3. Impediment: Historical establishment of policies and practices resulting in segregation of minority populations
Recommended Actions: Review land use and planning policies and practices in the city; encourage change, such as enhanced inclusionary zoning policies or waiving impact fees for affordable housing projects, and modification of planning and zoning ordinances and land use practices as needed
4. Impediment: Inequitable community development activities
Recommended Actions: Refocus community development efforts to more broadly address community development issues in North Tulsa; coordinate with citywide private investment strategies
5. Impediment: Land use and planning decisions resulting in unequal access to government services such as transportation and trash pickup
Recommended Actions: Evaluate current and future planning decisions in relation to placement of government services such as bus routes and trash collection; make changes to improve equity
6. Impediment: Failure to provide reasonable accommodation in public housing
Recommended Actions: Conduct testing and enforcement activities; advise public housing agencies of scope and severity of problem; request and monitor change

Three City Council Initiatives

Completion of adequate fair housing planning is a requirement of the Consolidated Plan, and HUD’s FHEO review and approval of that plan will be accomplished when specific actions with measurable outcomes are described in the upcoming Annual Action Plan. Furthermore, specific City agencies such as the Department of Grants Administration (DGA), the Human

Rights Department (HRD), or another agency altogether must take lead responsibility for one or more of these actions, at the discretion of the City Council.

Nevertheless, the aforementioned public and private sector fair housing actions could have either a broad or narrow definition or approach, depending on the resource commitment made by the City and the City Council. Such definition will need to be provided by and approved by the City Council.

To initiate this dialogue, the 2011 Tulsa AI suggests that the City Council approve and the City allocate 2.0 percent of its annual HUD CPD formula grant toward these additional fair housing activities. In fiscal 2010, this would have been 2.0 percent of roughly \$6.8 million dollars, or \$138,000.

The 2.0 percent allocation would be used to contractually secure fair housing services through one or more of the existing entities comprising Tulsa's fair housing infrastructure with the contractual arrangements specifying the level and scope of outreach, education, testing and enforcement that Tulsa will conduct over the upcoming federal fiscal year.

In summary, the 2011 Tulsa AI recommends that:

1. The City Council designate a responsible agency for each impediment and its consequent action; and,
2. The City Council designate an appropriate percent allocation from the HUD CPD grant to be dedicated to fair housing service activities, if 2.0 percent is not acceptable; and,
3. The City Council approve the final contract, or contracts, to be let for fair housing services each year.

Specific Proposed Actions

On January 18, 2011, the Human Rights Commission (HRC) of the City of Tulsa discussed the AI. A motion was made at this meeting to restate the HRC's responsibility under Title 5 of Tulsa Revised Ordinances (presented in Appendix F) and to highlight the importance of the Department of Grants Administration to consider Section 104 of Title 5, "Discrimination in Housing Prohibited."

Due to the fact that the Human Rights Department (HRD) holds responsibility for the implementation and enforcement of Title 5, it was determined that the HRD should be the lead agency in implementing each of the recommendations presented in this AI, with the exception of the testing activities. The Department of Grants Administration (DGA) recommended that the City Council implement the 2.0 percent allocation of CDBG funding to the HRD as proposed in this AI.

The strategic goals of the HRD include monitoring the planning, program development, subrecipient capacity-building, outreach and advocacy for subrecipients and citizens in relation to HUD grants. The HRD recognizes the need to have well-trained and dedicated staff members available to support the City in its efforts to remove impediments to fair housing

choice for citizens of Tulsa. In this spirit, efforts will be made by the DGA to make the following items available to the HRD:

1. Contract with an outside organization to provide testing services,
2. Utilize the procedures outlined in Title 5, Sections 107, 108 and 109 of the Tulsa Revised Ordinances to conduct enforcement,
3. File any violations, found by testing agency, with HRD for conciliation or referral,
4. Ongoing education/training in this area for HRD's Director, Program Resource Analyst, and Compliance Investigator,
5. Outreach and education opportunities for landlords, tenants, banking institutions, property managers, etc., and
6. Leverage and strengthen partnerships with Tulsa Area Fair Housing partnerships and CHDO agencies.

The specific corrective actions to be taken are presented in Table V111.2, on the following pages.

**Table VIII.2
Proposed Actions
2011 Tulsa, Oklahoma AI**

	Sector	Impediment	Recommendations	Action Plan
1A	Private	Discriminatory terms, conditions, privileges or services and facilities in rental markets	Conduct testing and enforcement activities	<ol style="list-style-type: none"> 1. Contract with outside organization to provide testing services 2. Utilize the procedures outlines in Title 5, Sections 107, 108 and 109 of the Tulsa Revised Ordinances to conduct enforcement 3. Any violations found by the testing agency should be filed with the City of Tulsa Human Rights Department for conciliation or referral
1B			Continue to educate landlords and property management companies in fair housing law	Encourage and develop partnerships among TFHP, subrecipients and the City of Tulsa in outreach and educational opportunities with tenants, landlords and property management companies
1C			Continue to educate housing consumers in fair housing rights	See 1B
2A	Private	Refusal to rent or negotiate for rent	Conduct testing and enforcement activities	See 1A
2B			Continue to educate landlords and property management companies in fair housing law	See 1B
2C			Continue to educate housing consumers in fair housing rights	See 1C
3A	Private	Failure to make reasonable accommodation	Conduct testing and enforcement activities	See 1A
3B			Hold training sessions to educate housing providers in requirements regarding reasonable accommodation or modification	Coordinate with TFHP to provide educational programs for housing providers to assist them with understanding the interrelation of fair housing laws and the Americans with Disabilities Act
4	Private	Statement of preferences in advertising for rental properties	Educate landlords and property management companies in fair housing law	See 1B
5A	Private	Steering, redlining, reverse redlining, and blockbusting in residential sales	Conduct testing activities to determine the scope and severity of the problem	See 1A
5B			Work to resolve these issues in the real estate industry through education and enforcement	<p>Require language in every HOME recipient contract that the subrecipient understands redlining, reverse redlining, and blockbusting are illegal and that the subrecipient will not participate in those activities</p> <p>Hold educational activities to inform homebuyers and potential homebuyers what would constitute the above and how the public can file a complaint with the City of Tulsa or appropriate federal agency.</p>

6A	Private	Denial of home purchase loans	Conduct testing activities to determine the severity of the problem	See 1A
6B			Educate buyers through credit counseling and home purchase training	See 1 B Partner with local non-profits to educate buyers
7A	Private	Predatory lending activities	Conduct testing activities to determine the severity of the problem	See 1A
7B			Conduct enforcement activities as needed	See 1A
7C			Educate buyers through credit counseling and home purchase training	See 1B
8A	Private	Unequal investment of Community Reinvestment Act resources	Monitor Community Reinvestment Act lending practices	Fund coordinator position within the City to ensure that Community Reinvestment Act funds are being utilized in areas of greatest need
8B			Advise Bankers' Association of findings	Hold "summit" with local Bankers' Association to appraise them of the problem and provide information to develop a strategy for remedying deficiencies
8C			Iterate the need for city-wide investment strategies	See 8B and include TMAPC, City of Tulsa Planning Department, and CHDOs
8D			Build vision of citywide investment approach	See 8C
9	Private	"Not In My Backyard" (NIMBY) tendencies	Work to promote development of residential housing in North Tulsa and public housing outside of North Tulsa	De-concentrate "low-income" properties away from one area of town Possibly limit the size of new multi-family developments Work on integrating every area of the city equally Utilize the expertise and resources of the Working in Neighborhoods (WIN) Department
10	Private	Failure to actively participate in the fair housing system	Enhance current outreach and education efforts to make fair housing more approachable and accessible for housing consumers	See 1B Partner with local TFHP, CHDOs and subrecipients to educate buyers
1A	Public		Evaluate current fair housing outreach and education efforts	Use internal reporting to reveal the effect of those efforts through the utilization of document tracking, reports and impact studies
1B			Examine ways in which these activities could be made more effective	Compare findings with other cities of comparable size and demographics
1C			Implement enhancements	Utilize the procedures outlines in Title 5, Sections 107, 108 and 109 of the Tulsa Revised Ordinances to conduct enforcement
2A	Public	Failure to adequately enforce fair housing laws	Increase the level of monitoring, testing and	1. Contract with outside organization to provide testing

			enforcement of laws related to fair housing	<p>services</p> <p>2. Utilize the procedures outlines in Title 5, Sections 107, 108 and 109 of the Tulsa Revised Ordinances to conduct enforcement</p> <p>3. Any violations found by the testing agency should be filed with the City of Tulsa Human Rights Department for conciliation or referral</p>
2B			Select some testing results for enforcement, including conciliation and/or litigation	See 1A (private sector)
3A	Public	Historical establishment of policies and practices resulting in segregation of minority populations	Review land use and planning policies and practices in the city	Participate in the meetings and discussions with the Planning Department related to implementing the PLANiTULSA Comprehensive Plan, Consolidated Plan and Annual Action Plans (related to housing) in order to meet any residual effects of prior planning policies
3B			Encourage change, such as enhance inclusionary zoning policies or waiving impact fees for affordable housing projects, and modification of planning and zoning ordinances and land use practices as needed	<p>See 3A</p> <p>Deconcentrate "low income" properties away from one area of town</p> <p>Possibly limit the size of new multi-family developments</p> <p>Work on integrating every area of the city</p>
4A	Public	Inequitable community development activities	Refocus community development efforts to more broadly address community development issues in North Tulsa	Fund coordinator position within the City to ensure that funds are being utilized in developing North Tulsa
4B			Coordinate with citywide private investment strategies	See 4A
5A	Public	Land use and planning decisions resulting in unequal access to government services and trash pickup	Evaluate current and future planning decisions in relation to placement of government services such as bus routes and trash collection	<p>See 3A</p> <p>Include TMAPC and the MTTA in the discussions, etc.</p>
5B			Make changes to improve equity	TBD
6A	Public	Failure to provide reasonable accommodation in public housing	Conduct testing and enforcement activities	See 1A (private sector)
6B			Advise public housing agencies of scope and severity of problem	Encourage partnerships between subrecipients and the City of Tulsa in outreach and educational opportunities with tenants, landlords and property management companies
6C			Request and monitor change	<p>Fund coordinator position within the City to ensure that funds are being utilized in developing North Tulsa</p> <p>Encourage and develop partnerships among TFHP, subrecipients and the City of Tulsa in outreach and education opportunities with tenants, landlords and property management companies</p>

APPENDIX A: ADDITIONAL CENSUS DATA

This section of the document contains additional data from the U.S. Census Bureau for the City of Tulsa.

Table A.1	
Group Quarters Population	
City of Tulsa	
U.S. Census Bureau Data, 2000	
Group Quarters	Total
Institutionalized	
Correctional Institutions	1,215
Nursing Homes	2,476
Other Institutions	1,031
Total	4,722
Non-institutionalized	
College Dormitories	3,663
Military Quarters	0
Other Non-institutional Group Quarters	2,048
Total	5,711
Group Quarters Population	10,433

Table A.2				
Elderly Population by Age				
City of Tulsa				
U.S. Census Bureau Data				
Age	2000 Census		2009 Five-Year ACS	
	Population	% of Total	Population	% of Total
65 to 66	5,272	10.4%	5,250	10.6%
67 to 69	7,864	15.6%	6,706	13.6%
70 to 74	12,846	25.4%	11,341	23.0%
75 to 79	11,180	22.1%	10,518	21.3%
80 to 84	7,076	14.0%	8,598	17.4%
85 and over	6,270	12.4%	6,941	14.1%
Total	50,508	100.0%	49,354	100.0%

APPENDIX B: ADDITIONAL BLS/BEA DATA

This section of the document contains additional Bureau of Labor Statistics (BLS) and Bureau of Economic Data (BEA) data as they pertain to employment and income for the City of Tulsa and Tulsa County.

Table B.1 Labor Force Statistics City of Tulsa BLS Data				
Year	Labor Force	Employment	Unemployment	Unemployment Rate
1990	198,147	188,974	9,173	4.6
1991	200,406	189,408	10,998	5.5
1992	200,789	188,845	11,944	5.9
1993	202,317	189,138	13,179	6.5
1994	204,052	192,246	11,806	5.8
1995	202,664	193,970	8,694	4.3
1996	205,643	198,386	7,257	3.5
1997	212,620	204,766	7,854	3.7
1998	219,174	211,600	7,574	3.5
1999	220,486	212,500	7,986	3.6
2000	205,390	198,922	6,468	3.1
2001	206,330	198,679	7,651	3.7
2002	207,300	195,916	11,384	5.5
2003	205,102	191,560	13,542	6.6
2004	201,920	190,906	11,014	5.5
2005	203,673	194,278	9,395	4.6
2006	204,668	195,834	8,834	4.3
2007	203,996	195,422	8,574	4.2
2008	190,047	183,315	6,732	3.5
2009	190,155	177,867	12,288	6.5

Table B.2
Real Earnings by Industry
Tulsa County
BEA Data, 2010 Dollars

NAICS Categories	2001	2002	2003	2004	2005	2006	2007	2008	2009	% Change 01-09
Farm earnings	5,183	5,699	4,118	7,562	9,326	5,325	8,698	8,373	6,828	31.7%
Forestry, fishing, related activities, and other	5,010	4,037	4,206	4,201	3,825	3,866	4,362	4,000	4,167	-16.8%
Mining	1,192,501	986,937	1,162,350	1,413,554	1,671,080	2,218,909	(D)	2,456,850	2,034,569	70.6%
Utilities	409,755	423,316	373,701	406,584	394,539	494,804	551,770	624,028	665,577	62.4%
Construction	1,302,283	1,290,305	1,294,405	1,267,218	1,283,655	1,316,931	1,278,676	1,319,958	1,181,755	-9.3%
Manufacturing	3,972,823	3,164,227	3,045,004	3,558,002	3,549,183	4,086,537	3,908,801	4,106,902	3,772,090	-5.1%
Wholesale trade	1,307,043	1,439,230	1,269,357	1,372,088	1,394,195	1,466,772	1,483,721	1,481,598	1,312,215	0.4%
Retail trade	1,588,498	1,615,433	1,490,969	1,467,687	1,470,264	1,513,671	1,463,455	1,416,913	1,379,889	-13.1%
Transportation and warehousing	1,373,561	1,325,179	1,372,148	1,429,621	1,341,194	1,364,282	1,426,385	1,472,239	1,458,805	6.2%
Information	1,157,351	1,133,400	936,243	879,151	885,795	782,306	(D)	838,730	790,032	-31.7%
Finance and insurance	1,078,211	1,054,769	1,050,041	1,059,364	1,062,509	1,150,105	1,107,849	1,043,038	1,058,856	-1.8%
Real estate and rental and leasing	430,503	403,119	406,171	425,886	492,342	476,966	462,851	405,389	356,290	-17.2%
Professional and technical services	1,772,846	1,699,378	1,585,818	1,630,454	1,676,474	1,760,020	1,855,748	1,953,290	1,853,192	4.5%
Management of companies and enterprises	448,569	444,340	512,401	544,640	494,400	534,000	565,237	551,649	555,780	23.9%
Administrative and waste services	1,166,296	1,033,406	1,063,358	1,161,405	1,269,729	1,361,076	1,394,671	1,477,313	1,283,293	10.0%
Educational services	221,978	259,643	255,640	262,605	254,521	263,749	269,968	278,750	276,574	24.6%
Health care and social assistance	2,059,406	2,146,434	2,187,644	2,273,826	2,323,624	2,416,834	2,464,339	2,528,573	2,614,661	27.0%
Arts, entertainment, and recreation	91,693	94,038	98,844	100,245	87,331	95,246	108,655	112,797	107,960	17.7%
Accommodation and food services	555,540	539,518	531,311	558,487	574,742	585,593	594,914	589,717	596,266	7.3%
Other services, except public administration	670,417	708,135	665,379	662,327	661,232	677,347	712,518	715,196	686,352	2.4%
Government and government enterprises	1,794,714	1,832,740	1,821,816	1,842,387	1,920,508	1,979,022	2,042,506	2,092,626	2,135,503	19.0%
Total	22,604,181	21,603,282	21,130,924	22,327,291	22,820,469	24,553,359	24,093,500	25,477,930	24,130,651	6.8%

Table B.3
Employment by Industry
Tulsa County
BEA Data

NAICS Categories	2001	2002	2003	2004	2005	2006	2007	2008	2009	% Change 01-09
Farm employment	1,429	1,340	1,247	1,233	1,197	1,140	1,163	1,165	1,144	-19.9%
Forestry, fishing, related activities, and other	256	305	257	272	252	254	292	288	299	16.8%
Mining	9,207	8,346	10,087	7,786	8,486	9,750	(D)	13,575	16,970	84.3%
Utilities	3,620	3,538	2,385	2,398	2,470	2,539	2,862	3,218	3,518	-2.8%
Construction	23,580	22,771	22,438	21,765	22,498	24,001	24,761	25,673	23,531	-0.2%
Manufacturing	43,210	40,320	36,258	36,206	37,066	39,418	41,025	42,000	37,088	-14.2%
Wholesale trade	18,133	18,261	17,599	17,176	17,504	18,157	18,318	17,838	16,725	-7.8%
Retail trade	47,790	47,058	44,198	43,786	44,344	45,394	44,796	44,879	44,622	-6.6%
Transportation and warehousing	18,674	18,403	18,153	17,853	17,667	18,386	19,244	18,815	18,322	-1.9%
Information	15,615	14,866	11,719	11,466	11,473	10,949	(D)	10,876	10,219	-34.6%
Finance and insurance	20,056	20,398	19,918	20,151	20,064	20,712	21,653	21,752	22,792	13.6%
Real estate and rental and leasing	14,767	14,565	14,492	15,264	16,726	17,324	17,855	17,810	17,019	15.3%
Professional and technical services	27,264	26,548	25,747	26,596	27,123	28,144	28,966	29,113	27,985	2.6%
Management of companies and enterprises	6,132	5,856	6,162	6,283	6,342	6,260	6,069	6,173	5,845	-4.7%
Administrative and waste services	36,247	32,438	31,513	35,720	38,628	40,434	42,896	44,087	37,504	3.5%
Educational services	7,617	8,689	7,798	8,011	8,078	8,218	8,118	7,958	8,027	5.4%
Health care and social assistance	41,886	42,820	43,224	42,221	44,190	45,645	46,997	47,421	48,723	16.3%
Arts, entertainment, and recreation	5,176	5,253	5,522	5,571	5,455	5,699	5,996	6,246	6,250	20.7%
Accommodation and food services	28,397	28,199	27,751	28,461	29,227	29,808	29,854	30,335	31,107	9.5%
Other services, except public administration	20,975	21,161	21,057	21,119	21,342	22,205	22,991	22,871	22,381	6.7%
Government and government enterprises	36,488	36,526	35,459	35,922	36,876	37,637	38,066	39,071	39,600	8.5%
Total	426,519	417,661	402,984	405,260	417,008	432,074	443,403	451,164	439,671	3.1%

Table B.4
Real Earnings Per Job by Industry
Tulsa County
BEA Data, 2010 Dollars

NAICS Categories	2001	2002	2003	2004	2005	2006	2007	2008	2009	% Change 01-09
Farm employment	3,627	4,253	3,302	6,133	7,791	4,671	7,479	7,187	5,969	64.6%
Forestry, fishing, related activities, and other	19,569	13,237	16,367	15,445	15,180	15,222	14,938	13,887	13,937	-28.8%
Mining	129,521	118,253	115,233	181,551	196,922	227,580	(D)	180,983	119,892	-7.4%
Utilities	113,192	119,648	156,688	169,551	159,732	194,881	192,792	193,918	189,192	67.1%
Construction	55,228	56,664	57,688	58,223	57,056	54,870	51,641	51,414	50,221	-9.1%
Manufacturing	91,942	78,478	83,982	98,271	95,753	103,672	95,279	97,783	101,706	10.6%
Wholesale trade	72,081	78,814	72,127	79,884	79,650	80,783	80,998	83,059	78,458	8.8%
Retail trade	33,239	34,329	33,734	33,520	33,156	33,345	32,669	31,572	30,924	-7.0%
Transportation and warehousing	73,555	72,009	75,588	80,077	75,915	74,202	74,121	78,248	79,620	8.2%
Information	74,118	76,241	79,891	76,675	77,207	71,450	(D)	77,117	77,310	4.3%
Finance and insurance	53,760	51,709	52,718	52,571	52,956	55,528	51,164	47,951	46,457	-13.6%
Real estate and rental and leasing	29,153	27,677	28,027	27,901	29,436	27,532	25,923	22,762	20,935	-28.2%
Professional and technical services	65,025	64,012	61,592	61,304	61,810	62,536	64,066	67,093	66,221	1.8%
Management of companies and enterprises	73,152	75,878	83,155	86,685	77,956	85,303	93,135	89,365	95,086	30.0%
Administrative and waste services	32,176	31,858	33,743	32,514	32,871	33,662	32,513	33,509	34,217	6.3%
Educational services	29,142	29,882	32,783	32,780	31,508	32,094	33,256	35,028	34,455	18.2%
Health care and social assistance	49,167	50,127	50,612	53,855	52,583	52,948	52,436	53,322	53,664	9.1%
Arts, entertainment, and recreation	17,715	17,902	17,900	17,994	16,009	16,713	18,121	18,059	17,274	-2.5%
Accommodation and food services	19,563	19,133	19,146	19,623	19,665	19,645	19,927	19,440	19,168	-2.0%
Other services, except public administration	31,963	33,464	31,599	31,362	30,983	30,504	30,991	31,271	30,667	-4.1%
Government and government enterprises	49,186	50,176	51,378	51,289	52,080	52,582	53,657	53,560	53,927	9.6%
Total	52,997	51,725	52,437	55,094	54,724	56,827	54,338	56,472	54,883	3.6%

Table B.5
Total Employment and Real Personal Income
Tulsa County
BEA Data, 2010 Dollars

Year	1,000s of 2010 Dollars						Per Capita Income	Total Employment	Average Real Earnings Per Job
	Earnings	Social Security Contributions	Residents Adjustments	Dividends, Interest, Rents	Transfer Payments	Personal Income			
1969	7,135,533	474,961	-713,634	1,162,348	554,789	7,664,075	19,329	206,901	34,486
1970	7,108,613	465,023	-713,192	1,196,899	622,951	7,750,249	19,362	207,027	34,338
1971	7,239,718	487,089	-738,482	1,247,413	696,341	7,957,900	19,675	208,768	34,679
1972	7,711,596	546,884	-814,836	1,240,846	732,562	8,323,284	20,316	222,051	34,728
1973	8,365,481	689,151	-909,255	1,363,163	802,564	8,932,803	21,590	236,436	35,382
1974	9,091,368	764,416	-1,009,245	1,471,095	858,362	9,647,164	23,102	249,330	36,465
1975	9,415,059	772,995	-1,015,015	1,462,292	971,021	10,060,362	23,708	255,800	36,807
1976	10,022,183	839,956	-1,112,355	1,491,614	1,011,145	10,572,631	24,576	267,353	37,487
1977	10,710,191	893,328	-1,250,636	1,560,001	1,018,910	11,145,139	25,662	275,945	38,811
1978	11,508,695	988,452	-1,420,737	1,693,814	1,021,980	11,815,300	26,897	292,658	39,326
1979	12,246,152	1,093,657	-1,682,770	1,798,865	1,086,450	12,355,041	27,180	306,089	40,007
1980	13,197,087	1,180,339	-1,936,393	2,066,621	1,150,203	13,297,178	28,100	326,028	40,479
1981	14,039,118	1,344,218	-2,064,989	2,427,305	1,199,413	14,256,630	29,532	341,159	41,151
1982	14,226,681	1,401,728	-2,071,446	2,705,230	1,306,900	14,765,637	29,674	343,416	41,426
1983	13,498,322	1,332,977	-1,905,887	2,678,686	1,392,614	14,330,758	28,261	329,264	40,996
1984	13,782,437	1,386,885	-1,939,624	2,905,361	1,384,899	14,746,187	29,120	336,847	40,915
1985	13,981,398	1,432,464	-1,962,414	3,074,005	1,453,326	15,113,851	29,962	339,866	41,138
1986	13,945,725	1,454,966	-1,917,544	2,988,001	1,543,213	15,104,430	29,738	330,399	42,208
1987	13,585,616	1,410,596	-1,822,967	2,871,846	1,588,764	14,812,664	29,288	328,870	41,310
1988	13,748,756	1,494,670	-1,839,747	2,882,513	1,631,109	14,927,961	29,889	333,747	41,195
1989	14,337,301	1,556,952	-1,958,917	2,972,990	1,699,240	15,493,663	31,021	339,551	42,224
1990	14,967,202	1,681,223	-2,050,677	3,303,303	1,736,517	16,275,122	32,210	349,336	42,845
1991	14,956,071	1,727,275	-2,062,220	3,149,985	1,801,397	16,117,957	31,350	354,563	42,182
1992	15,484,269	1,761,352	-2,131,218	3,172,018	1,948,621	16,712,337	32,035	354,009	43,739
1993	15,767,270	1,795,379	-2,125,784	3,044,862	2,031,732	16,922,702	32,152	356,679	44,206
1994	15,842,758	1,845,091	-2,188,766	3,220,380	2,060,997	17,090,278	32,303	363,230	43,616
1995	16,118,990	1,870,296	-2,168,438	3,376,380	2,179,392	17,636,028	33,205	370,889	43,460
1996	17,006,214	1,931,013	-2,299,325	3,561,303	2,252,857	18,590,036	34,561	384,320	44,251
1997	18,297,173	2,038,778	-2,507,617	3,498,926	2,405,641	19,655,345	35,999	399,749	45,772
1998	19,775,828	2,182,628	-2,744,723	3,922,838	2,443,064	21,214,381	38,254	420,189	47,064
1999	20,292,578	2,201,872	-2,899,079	3,887,241	2,496,982	21,575,849	38,413	418,692	48,466
2000	21,335,360	2,271,838	-3,065,739	4,394,513	2,576,243	22,968,540	40,734	427,016	49,964
2001	22,604,181	2,371,852	-3,180,839	4,199,335	2,760,548	24,011,372	42,363	426,519	52,997
2002	21,603,282	2,339,273	-3,101,794	4,090,408	2,802,318	23,054,941	40,433	417,661	51,725
2003	21,130,924	2,266,937	-2,973,672	3,937,998	2,863,868	22,692,181	39,840	402,984	52,437
2004	22,327,291	2,341,635	-3,047,841	4,131,195	2,931,535	24,000,545	42,278	405,260	55,094
2005	22,820,469	2,416,276	-3,200,447	4,694,334	3,066,495	24,964,575	43,794	417,008	54,724
2006	24,553,359	2,497,833	-3,508,323	5,366,062	3,222,094	27,135,358	47,006	432,074	56,827
2007	24,093,500	2,515,344	-3,596,222	5,646,901	3,356,269	26,985,104	46,096	443,403	54,338
2008	25,477,930	2,581,408	-3,689,981	5,811,295	3,631,447	28,649,282	48,361	451,164	56,472
2009	24,130,651	2,503,794	-3,734,657	5,329,103	4,070,330	27,291,633	45,338	439,671	54,883

APPENDIX C: ADDITIONAL HMDA DATA

The Home Mortgage Disclosure Act (HMDA) requires both depository and non-depository lenders to collect and publicly disclose information about housing-related loans and applications for such loans.²¹ Both types of lending institutions must meet a set of reporting criteria, as follows:

1. The institution must be a bank, credit union or savings association.
2. The total assets must exceed the coverage threshold.²²
3. The institution must have had a home or branch office in a metropolitan statistical area (MSA).
4. The institution must have originated at least one home purchase loan or refinancing of a home purchase loan secured by a first lien on a one- to four-family dwelling.
5. The institution must be federally insured or regulated.
6. The mortgage loan must have been insured, guaranteed or supplemented by a federal agency or intended for sale to Fannie Mae or Freddie Mac.

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

1. The institution must be a for-profit organization.
2. The institution's home purchase loan originations must equal or exceed 10.0 percent of the institution's total loan originations, or more than \$25 million.
3. The institution must have had a home or branch office in an MSA or have received applications for, originated or purchased five or more home purchase loans, home improvement loans, or refinancing mortgages on property located in an MSA in the preceding calendar year.
4. The institution must have assets exceeding \$10 million or have originated 100 or more home purchases in the preceding calendar year.

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

The information presented in this section of the Analysis of Impediments offers details pertaining to HMDA data as related to the City of Tulsa.

²¹ Data are considered "raw" because they contain entry errors and incomplete loan applications. Starting in 2004, the HMDA data made substantive changes in reporting. It modified the way it handled Hispanic data, loan interest rates, as well as the reporting of multifamily loan applications.

²² 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.

Table C.1							
Owner-Occupied Home Purchase Loan Applications by Loan Type							
City of Tulsa HMDA Data							
Loan Type	2004	2005	2006	2007	2008	2009	Total
Conventional	10,447	13,618	14,436	10,606	4,986	3,871	57,964
FHA - Insured	1,713	1,612	1,461	1,669	3,800	5,139	15,394
VA - Guaranteed	236	258	223	219	319	418	1,673
Rural Housing Service or Farm Service Agency	44	49	50	30	126	331	630
Total	12,440	15,537	16,170	12,524	9,231	9,759	75,661

Table C.2								
Owner-Occupied Home Purchase Loan Applications by Selected Action Taken by Race								
City of Tulsa HMDA Data								
Race		2004	2005	2006	2007	2008	2009	Total
American Indian or Alaskan Native	Originated	206	223	259	218	201	263	1,370
	Denied	67	66	54	36	38	24	285
	Denial Rate %	24.5%	22.8%	17.3%	14.2%	15.9%	8.4%	17.2%
Asian	Originated	156	147	204	175	140	139	961
	Denied	21	44	33	29	27	26	180
	Denial Rate %	11.9%	23.0%	13.9%	14.2%	16.2%	15.8%	15.8%
Black	Originated	473	518	523	406	289	204	2,413
	Denied	213	282	270	170	81	67	1,083
	Denial Rate %	31.0%	35.3%	34.0%	29.5%	21.9%	24.7%	31.0%
White	Originated	5,022	6,228	6,096	5,245	4,042	4,189	30,822
	Denied	1,011	1,121	1,081	732	524	457	4,926
	Denial Rate %	16.8%	15.3%	15.1%	12.2%	11.5%	9.8%	13.8%
Not Applicable	Originated	456	483	751	482	303	365	2,840
	Denied	222	289	263	136	94	84	1,088
	Denial Rate %	32.7%	37.4%	25.9%	22.0%	23.7%	18.7%	27.7%
No Co-Applicant	Originated	30	1	4	2	8	6	51
	Denied	6	0	0	0	0	0	6
	Denial Rate %	16.7%	0.0%	0.0%	0.0%	0.0%	0.0%	10.5%
Total	Originated	6,343	7,600	7,837	6,528	4,983	5,166	38,457
	Denied	1,540	1,802	1,701	1,103	764	658	7,568
	Denial Rate %	19.5%	19.2%	17.8%	14.5%	13.3%	11.3%	16.4%

Table C.3								
Owner-Occupied Home Purchase Loan Applications by Selected Action Taken by Ethnicity								
City of Tulsa HMDA Data								
Ethnicity		2004	2005	2006	2007	2008	2009	Total
Hispanic (Ethnicity)	Originated	456	558	591	376	243	269	2,493
	Denied	131	209	188	78	83	65	754
	Denial Rate %	22.3%	27.2%	24.1%	17.2%	25.5%	19.5%	23.2%
Not Hispanic (Ethnicity)	Originated	5,887	7,042	7,246	6,152	4,740	4,897	35,964
	Denied	1,409	1,593	1,513	1,025	681	593	6,814
	Denial Rate %	19.3%	18.4%	17.3%	14.3%	12.6%	10.8%	15.9%
Total	Originated	6,343	7,600	7,837	6,528	4,983	5,166	38,457
	Denied	1,540	1,802	1,701	1,103	764	658	7,568
	Denial Rate %	19.5%	19.2%	17.8%	14.5%	13.3%	11.3%	16.4%

Table C.4								
Owner-Occupied Home Purchase Loan Applications by Selected Action Taken by Gender								
City of Tulsa HMDA Data								
Gender		2004	2005	2006	2007	2008	2009	Total
Male	Originated	4,159	4,995	5,223	4,264	3,304	3,402	25,347
	Denied	884	1,053	988	653	461	398	4,437
	Denial Rate %	17.5%	17.4%	15.9%	13.3%	12.2%	10.5%	14.9%
Female	Originated	2,039	2,369	2,414	2,076	1,567	1,642	12,107
	Denied	556	636	591	373	253	218	2,627
	Denial Rate %	21.4%	21.2%	19.7%	15.2%	13.9%	11.7%	17.8%
Not Provided by Applicant	Originated	143	234	196	186	102	116	977
	Denied	100	113	121	77	49	42	502
	Denial Rate %	41.2%	32.6%	38.2%	29.3%	32.5%	26.6%	33.9%
Not Applicable	Originated	2	2	4	2	10	6	26
	Denied	0	0	1	0	1	0	2
	Denial Rate %	0.0%	0.0%	20.0%	0.0%	9.1%	0.0%	7.1%
Total	Originated	6,343	7,600	7,837	6,528	4,983	5,166	38,457
	Denied	1,540	1,802	1,701	1,103	764	658	7,568
	Denial Rate %	19.5%	19.2%	17.8%	14.5%	13.3%	11.3%	16.4%

Table C.5							
Owner-Occupied Home Purchase Loan Applications by Reason for Denial by Race							
City of Tulsa HMDA Data, 2004 – 2009							
Denial Reason	American Indian or Alaskan Native	Asian	Black	White	Not Applicable	No Co-Applicant	Total
Credit History	64	34	264	1,058	201	0	1,621
Debt-to-income Ratio	40	22	150	500	90	1	803
Credit Application Incomplete	20	17	64	370	67	0	538
Collateral	11	10	61	339	54	0	475
Unverifiable Information	6	7	45	206	33	2	299
Employment History	3	14	28	116	25	0	186
Insufficient Cash	3	8	20	121	19	0	171
Mortgage Insurance Denied	0	0	1	10	2	0	13
Other	30	23	212	770	186	3	1,224
Missing	108	45	238	1,436	411	0	2,238
Total	285	180	1,083	4,926	1,088	6	7,568
% Missing	37.9%	25.0%	22.0%	29.2%	37.8%	0.0%	29.6%

Table C.6			
Owner-Occupied Home Purchase Loan Applications by Reason for Denial by Ethnicity			
City of Tulsa HMDA Data, 2004 – 2009			
Denial Reason	Hispanic	Not Hispanic	Total
Credit History	158	1,463	1,621
Debt-to-income Ratio	79	724	803
Credit Application Incomplete	68	470	538
Collateral	32	443	475
Unverifiable Information	47	252	299
Employment History	22	164	186
Insufficient Cash	15	156	171
Mortgage Insurance Denied	2	11	13
Other	103	1,121	1,224
Missing	228	2,010	2,238
Total	754	6,814	7,568
% Missing	30.2%	29.5%	29.6%

Table C.7
Action of Owner-Occupied Home Purchase Loan Applications by Income: Originated and Denied
 City of Tulsa
 HMDA Data

Income Group		2004	2005	2006	2007	2008	2009	Total
\$15,000 or less	Loan Originated	69	42	55	39	34	20	259
	Application Denied	80	52	39	36	21	24	252
	Denial Rate %	53.7%	55.3%	41.5%	48.0%	38.2%	54.5%	49.3%
More than \$15,000 up to \$30,000	Loan Originated	1,148	1,173	1,003	870	576	688	5,458
	Application Denied	457	558	464	243	160	154	2,036
	Denial Rate %	28.5%	32.2%	31.6%	21.8%	21.7%	18.3%	27.2%
More than \$30,000 up to \$45,000	Loan Originated	1,511	1,791	1,774	1,398	1,101	1,286	8,861
	Application Denied	410	510	462	300	202	180	2,064
	Denial Rate %	21.3%	22.2%	20.7%	17.7%	15.5%	12.3%	18.9%
More than \$45,000 up to \$60,000	Loan Originated	1,113	1,434	1,430	1,109	862	897	6,845
	Application Denied	277	290	299	174	138	95	1,273
	Denial Rate %	19.9%	16.8%	17.3%	13.6%	13.8%	9.6%	15.7%
More than \$60,000 up to \$75,000	Loan Originated	738	917	926	734	602	590	4,507
	Application Denied	114	131	141	103	73	59	621
	Denial Rate %	13.4%	12.5%	13.2%	12.3%	10.8%	9.1%	12.1%
More than \$75,000	Loan Originated	1,603	2,059	2,455	2,264	1,711	1,594	11,686
	Application Denied	153	211	249	204	156	134	1,107
	Denial Rate %	8.7%	9.3%	9.2%	8.3%	8.4%	7.8%	8.7%
Data Missing	Loan Originated	161	184	194	114	97	91	841
	Application Denied	49	50	47	43	14	12	215
	Denial Rate %	23.3%	21.4%	19.5%	27.4%	12.6%	11.7%	20.4%
Total	Loan Originated	6,343	7,600	7,837	6,528	4,983	5,166	38,457
	Application Denied	1,540	1,802	1,701	1,103	764	658	7,568
	Denial Rate %	19.5%	19.2%	17.8%	14.5%	13.3%	11.3%	16.4%

Table C.8
Action of Owner-Occupied Home Purchase Loan Applications by Income By Race: Originated and Denied

City of Tulsa
HMDA Data, 2004 – 2009

Race		<= \$15K	\$15K - \$30K	\$30K - \$45K	\$45K - \$60K	\$60K - \$75K	> \$75K	Data Missing	Total
American Indian or Alaskan Native	Loan Originated	7	217	405	241	174	300	26	1,370
	Application Denied	12	87	92	40	28	22	4	285
	Denial Rate %	63.2%	28.6%	18.5%	14.2%	13.9%	6.8%	13.3%	17.2%
Asian	Loan Originated	6	143	229	173	116	256	38	961
	Application Denied	4	44	37	30	14	38	13	180
	Denial Rate %	40.0%	23.5%	13.9%	14.8%	10.8%	12.9%	25.5%	15.8%
Black	Loan Originated	30	561	766	492	252	269	43	2,413
	Application Denied	35	374	338	163	72	84	17	1,083
	Denial Rate %	53.8%	40.0%	30.6%	24.9%	22.2%	23.8%	28.3%	31.0%
White	Loan Originated	192	4,135	6,860	5,450	3,619	9,934	632	30,822
	Application Denied	156	1,235	1,329	879	413	790	124	4,926
	Denial Rate %	44.8%	23.0%	16.2%	13.9%	10.2%	7.4%	16.4%	13.8%
Not Applicable	Loan Originated	22	394	596	485	345	919	79	2,840
	Application Denied	45	293	266	160	94	173	57	1,088
	Denial Rate %	67.2%	42.6%	30.9%	24.8%	21.4%	15.8%	41.9%	27.7%
No Co-Applicant	Loan Originated	2	8	5	4	1	8	23	51
	Application Denied	0	3	2	1	0	0	0	6
	Denial Rate %	0.0%	27.3%	28.6%	20.0%	0.0%	0.0%	0.0%	10.5%
Total	Loan Originated	259	5,458	8,861	6,845	4,507	11,686	841	38,457
	Application Denied	252	2,036	2,064	1,273	621	1,107	215	7,568
	Denial Rate %	49.3%	27.2%	18.9%	15.7%	12.1%	8.7%	20.4%	16.4%

Table C.9
Action of Owner Occupied Home Purchase Loan Applications by Income By Ethnicity Originated and Denied

City of Tulsa
HMDA Data, 2004 – 2009

Ethnicity		<= \$15K	\$15K - \$30K	\$30K - \$45K	\$45K - \$60K	\$60K - \$75K	> \$75K	Data Missing	Total
Hispanic (Ethnicity)	Loan Originated	34	810	745	378	198	273	55	2,493
	Application Denied	43	267	224	122	42	41	15	754
	Denial Rate %	55.8%	24.8%	23.1%	24.4%	17.5%	13.1%	21.4%	23.2%
Not Hispanic	Loan Originated	225	4,648	8,116	6,467	4,309	11,413	786	35,964
	Application Denied	209	1,769	1,840	1,151	579	1,066	200	6,814
	Denial Rate %	48.2%	27.6%	18.5%	15.1%	11.8%	8.5%	20.3%	15.9%
Total	Loan Originated	259	5,458	8,861	6,845	4,507	11,686	841	38,457
	Application Denied	252	2,036	2,064	1,273	621	1,107	215	7,568
	Denial Rate %	49.3%	27.2%	18.9%	15.7%	12.1%	8.7%	20.4%	16.4%

Table C.10
Percent Denial Rates by Income by White Applicants

City of Tulsa
HMDA Data

Income	2004	2005	2006	2007	2008	2009	Total
<= \$15K	46.7%	46.2%	45.0%	38.8%	40.9%	50.0%	44.8%
\$15K - \$30K	25.2%	25.9%	27.5%	17.9%	19.3%	15.2%	23.0%
\$30K - \$45K	18.9%	18.2%	17.1%	15.7%	13.9%	11.2%	16.2%
\$45K - \$60K	18.9%	14.1%	15.4%	11.5%	12.8%	8.4%	13.9%
\$60K - \$75K	11.7%	9.8%	11.1%	11.1%	8.8%	8.3%	10.2%
Above \$75K	7.1%	7.7%	8.0%	7.3%	7.0%	6.8%	7.4%
Data Missing	16.7%	16.9%	17.6%	26.1%	7.2%	8.4%	16.4%
Total	16.8%	15.3%	15.1%	12.2%	11.5%	9.8%	13.8%

Table C.11
Percent Denial Rates by Income by Black Applicants

City of Tulsa
HMDA Data

Income	2004	2005	2006	2007	2008	2009	Total
<= \$15K	60.0%	76.9%	22.2%	61.5%	0.0%	.	53.8%
\$15K - \$30K	37.9%	48.1%	42.9%	39.9%	25.3%	32.9%	40.0%
\$30K - \$45K	34.0%	33.1%	34.3%	28.4%	21.2%	22.6%	30.6%
\$45K - \$60K	21.3%	25.6%	28.6%	28.1%	21.1%	19.6%	24.9%
\$60K - \$75K	22.6%	26.6%	26.3%	10.6%	13.2%	31.8%	22.2%
Above \$75K	18.3%	26.9%	29.7%	22.4%	26.0%	8.3%	23.8%
Data Missing	16.7%	45.5%	37.5%	22.2%	30.0%	0.0%	28.3%
Total	31.0%	35.3%	34.0%	29.5%	21.9%	24.7%	31.0%

Table C.12
Originated Owner-Occupied Loans by Loan Purpose by Predatory Status

City of Tulsa
HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	Total
Home Purchase	Other Originated	5,266	5,668	5,862	5,641	4,506	4,889	31,832
	High APR Loan	1,077	1,932	1,975	887	477	277	6,625
	Percent High APR	17.0%	25.4%	25.2%	13.6%	9.6%	5.4%	17.2%
Home Improvement	Other Originated	954	916	843	862	788	776	5,139
	High APR Loan	229	271	248	201	179	126	1,254
	Percent High APR	19.4%	22.8%	22.7%	18.9%	18.5%	14.0%	19.6%
Refinancing	Other Originated	4,958	3,333	2,444	2,342	2,573	6,476	22,126
	High APR Loan	1,465	1,585	1,423	941	583	377	6,374
	Percent High APR	22.8%	32.2%	36.8%	28.7%	18.5%	5.5%	22.4%
Total	Other Originated	11,178	9,917	9,149	8,845	7,867	12,141	59,097
	High APR Loan	2,771	3,788	3,646	2,029	1,239	780	14,253
	Percent High APR	19.9%	27.6%	28.5%	18.7%	13.6%	6.0%	19.4%

Table C.13							
Percent of Predatory Owner-Occupied Home Purchase Loans Originated by Income							
City of Tulsa HMDA Data							
Income	2004	2005	2006	2007	2008	2009	Total
<= \$15K	23.2%	23.8%	21.8%	12.8%	11.8%	20.0%	19.7%
\$15K - \$30K	21.6%	32.3%	34.5%	23.9%	17.4%	6.4%	24.3%
\$30K - \$45K	21.2%	33.1%	32.7%	16.0%	11.4%	4.7%	21.5%
\$45K - \$60K	20.0%	28.7%	28.2%	15.0%	8.2%	4.2%	19.2%
\$60K - \$75K	14.5%	23.7%	22.4%	12.8%	6.6%	3.9%	15.3%
> \$75K	9.6%	14.0%	14.8%	7.6%	7.6%	6.5%	10.4%
Data Missing	5.6%	17.4%	33.0%	16.7%	6.2%	3.3%	15.8%
Total	17.0%	25.4%	25.2%	13.6%	9.6%	5.4%	17.2%

Table C.14								
Originated Owner-Occupied Home Purchase Loans by Income by Predatory Status								
City of Tulsa HMDA Data								
Income Group		2004	2005	2006	2007	2008	2009	Total
\$15,000 or less	Other Originated	53	32	43	34	30	16	208
	High APR Loan	16	10	12	5	4	4	51
	Percent High APR	23.2%	23.8%	21.8%	12.8%	11.8%	20.0%	19.7%
More than \$15,000 up to \$30,000	Other Originated	900	794	657	662	476	644	4,133
	High APR Loan	248	379	346	208	100	44	1,325
	Percent High APR	21.6%	32.3%	34.5%	23.9%	17.4%	6.4%	24.3%
More than \$30,000 up to \$45,000	Other Originated	1,191	1,198	1,194	1,175	975	1,225	6,958
	High APR Loan	320	593	580	223	126	61	1,903
	Percent High APR	21.2%	33.1%	32.7%	16.0%	11.4%	4.7%	21.5%
More than \$45,000 up to \$60,000	Other Originated	890	1,022	1,027	943	791	859	5,532
	High APR Loan	223	412	403	166	71	38	1,313
	Percent High APR	20.0%	28.7%	28.2%	15.0%	8.2%	4.2%	19.2%
More than \$60,000 up to \$75,000	Other Originated	631	700	719	640	562	567	3,819
	High APR Loan	107	217	207	94	40	23	688
	Percent High APR	14.5%	23.7%	22.4%	12.8%	6.6%	3.9%	15.3%
More than \$75,000	Other Originated	1,449	1,770	2,092	2,092	1,581	1,490	10,474
	High APR Loan	154	289	363	172	130	104	1,212
	Percent High APR	9.6%	14.0%	14.8%	7.6%	7.6%	6.5%	10.4%
Data Missing	Other Originated	152	152	130	95	91	88	708
	High APR Loan	9	32	64	19	6	3	133
	Percent High APR	5.6%	17.4%	33.0%	16.7%	6.2%	3.3%	15.8%
Total	Other Originated	5,266	5,668	5,862	5,641	4,506	4,889	31,832
	High APR Loan	1,077	1,932	1,975	887	477	277	6,625
	Percent High APR	17.0%	25.4%	25.2%	13.6%	9.6%	5.4%	17.2%

Table C.15
Originated Owner-Occupied Home Purchase Loans by Race by Predatory Status
City of Tulsa
HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	Total
American Indian	Other Originated	172	160	214	189	183	254	1,172
	High APR Loan	34	63	45	29	18	9	198
	Percent High APR	16.5%	28.3%	17.4%	13.3%	9.0%	3.4%	14.5%
Asian	Other Originated	136	116	161	158	126	129	826
	High APR Loan	20	31	43	17	14	10	135
	Percent High APR	12.8%	21.1%	21.1%	9.7%	10.0%	7.2%	14.0%
Black or African American	Other Originated	283	236	229	280	245	192	1,465
	High APR Loan	190	282	294	126	44	12	948
	Percent High APR	40.2%	54.4%	56.2%	31.0%	15.2%	5.9%	39.3%
White	Other Originated	4,282	4,854	4,714	4,616	3,672	3,955	26,093
	High APR Loan	740	1,374	1,382	629	370	234	4,729
	Percent High APR	14.7%	22.1%	22.7%	12.0%	9.2%	5.6%	15.3%
Not Applicable	Other Originated	365	301	541	396	276	355	2,234
	High APR Loan	91	182	210	86	27	10	606
	Percent High APR	20.0%	37.7%	28.0%	17.8%	8.9%	2.7%	21.3%
No Co-Applicant	Other Originated	28	1	3	2	4	4	42
	High APR Loan	2	0	1	0	4	2	9
	Percent High APR	6.7%	0.0%	25.0%	0.0%	50.0%	33.3%	17.6%
Total	Other Originated	5,266	5,668	5,862	5,641	4,506	4,889	31,832
	High APR Loan	1,077	1,932	1,975	887	477	277	6,625
	Percent High APR	17.0%	25.4%	25.2%	13.6%	9.6%	5.4%	17.2%

Table C.16
Originated Owner-Occupied Home Purchase Loans by Ethnicity by Predatory Status
City of Tulsa
HMDA Data

Ethnicity	Loan Type	2004	2005	2006	2007	2008	2009	Total
Hispanic	Other Originated	345	353	338	259	209	249	1,753
	High APR Loan	111	205	253	117	34	20	740
	Percent High APR	24.3%	36.7%	42.8%	31.1%	14.0%	7.4%	29.7%
Not Hispanic	Other Originated	4,921	5,315	5,524	5,382	4,297	4,640	30,079
	High APR Loan	966	1,727	1,722	770	443	257	5,885
	Percent High APR	16.4%	24.5%	23.8%	12.5%	9.3%	5.2%	16.4%
Total	Other Originated	5,266	5,668	5,862	5,641	4,506	4,889	31,832
	High APR Loan	1,077	1,932	1,975	887	477	277	6,625
	Percent High APR	17.0%	25.4%	25.2%	13.6%	9.6%	5.4%	17.2%

APPENDIX D: ADDITIONAL PUBLIC INPUT DATA

FAIR HOUSING FOCUS GROUP MINUTES, FEBRUARY 23 AND 24, 2011

Focus Group 1

Education

- During the mortgage bubble, there was a lot of racially-impacted predatory lending in Tulsa. For example, Hispanic-orientated mortgage companies opened in Hispanic neighborhoods and offered predatory loans. There is a need for education regarding predatory loans.
- There is a need for education regarding fair housing, especially in terms of renter rights, leases and where to go if there is a problem with a landlord.
- There should be more events such as block parties to educate the community about fair housing issues. The Realtors used to put these educational events together and it might be possible to do that again.
- We need better ways to get the community involved and their opinions such as making announcements in churches and introducing the concept of fair housing to the youth.
- Each community within Tulsa needs to ensure proper education, neighborhood development and job growth to promote fair housing. Each neighborhood needs to address their issues individually through a community plan.
- Citizens who could benefit from free or discounted services, such a dump days, often do not know these services exist. This is an education and outreach issue.

South Tulsa

- South Tulsa is expensive to live in and low- to moderate-income families cannot afford housing here.
- South Tulsa is seeing a change in its population: the stable older population is leaving their houses to their family who cannot afford to maintain or live in the homes. There has been a surge of foreclosures in this area.

North Tulsa

- North Tulsa needs more community resources including basic neighborhood features such as gas stations and grocery stores.
- The city needs to change the perception that North Tulsa is uninhabitable by investing, developing and adding resources to the neighborhood. Resources that are needed include grocery stores, medical facilities and gas stations.
- Residents need more resources to help prevent foreclosure and maintain the physical properties of their homes, especially as the ages and the demographics change.

- The high vacancy rate in North Tulsa contributes to the poor perception of this neighborhood.
- You can drive on the same road from South Tulsa to North Tulsa and watch the conditions of the pavement deteriorate from lack of repairs.

Lending

- Predatory lenders are using zip codes with high concentrations of minorities and low-income households to solicit predatory lending through the mail.

Tenant/Landlord Issues

- Out-of-town investors have occasionally created unfavorable living circumstances for tenants. There is a need for regulations to protect against unethical leases, property deterioration and poor management by investors.
- Rent-to-own situation have negatively affected housing options in Tulsa because the people who hold the deed participate in unscrupulous behavior.
- Tenants need to understand their rights and not be afraid to report illegal or unfair living circumstances.
- The equality center has had complaints regarding unfair treatment of gay tenants for example, not allowing them to display rainbow banners but allowing other tenants to display sports banners.

Other

- NIMBYism regarding housing development throughout Tulsa is prevalent.
- Housing segregation in Tulsa may be due to a variety of factors including income level and the history of each neighborhood. Additionally, Jim Crow laws set a historical context for neighborhood segregation.
- Codes are enforced properly in nicer neighborhood more quickly than low-income, minority neighborhoods.

Focus Group 2

Lending

- Mortgage lenders have been targeting specific ethnic areas. There needs to be education especially for low-income individuals and minority groups.
- Predatory lending is a more frequent problem than redlining. There was a study done before the mortgage crisis that predicted the effects of predatory lending in Tulsa but no one paid attention to its conclusion.
- Data analyzed by the home buyers education association indicated that subprime lending occurred most frequently in census tracts with specific minority and familial status attributes.

- Clients should be encouraged to find loans locally because local lenders have a usually vested interest in the community and predatory lenders frequently are not members of the community they target.

Real Estate

- There may be some problems with steering in the rental market. Real estate agents telling individuals that they should live in specific neighborhoods due to racial and socioeconomic make up of the neighborhoods.
- Fair housing complaints are usually not catalyzed by the seller. The seller typically do not care who purchases their homes as long as they can get the financing and complete the transaction.

Education

- The internet is not acceptable as the primary form of education regarding fair housing, many people do not know how to use or have access to the internet.
- The city needs to enhance cross-culture communication to further education.
- There used to be a partnership with monthly meetings regarding housing in Tulsa. That should be reinstated; the city needs to remain active in education and networking. When this group was active, the numbers show a drop in fair housing complaints.
- Realtors have the opportunity to educate their clients. They should take that opportunity to help their clients understand fair housing and predatory lending.
- Getting education and outreach to groups that are targeted by predatory lenders presents challenges. They are frequently minority group that do not want advice from outsiders.

North Tulsa

- Education needs to be increased, crime needs to decrease and the population density needs to increase in order to create private sector investment in North Tulsa.

Other

- Developers are not building to ADA regulations and not following proper procedures such as hanging fair housing posters in prominent locations in their buildings. These oversights are furthered by code enforcement not catching the problems.
- Housing development is affected by the political climate of the neighborhood. Some jurisdictions have rules and regulations that prevent development while others encourage development through their regulations.
- The city needs to use data and information about our population for planning purposes. For example, Oklahoma has a high rate of grandparents raising their grandchildren.
- There is a need for leadership in organizing the fair housing process.

Focus Group 3

North Tulsa

- In North Tulsa, it is difficult to obtain financing for mortgage loans because bankers are afraid to invest in this section of town. Some bankers have started refusing mortgages to this area.
- There are high vacancies rates, dilapidated housing and failed investments in this neighborhood.
- There needs to be community development investment in North Tulsa by both the private and public sector. There are not enough places to get groceries, go out to eat, or shop.
- The perception of North Tulsa is not good and needs to change so development can occur.
- Although North Tulsa is primarily white, many whites have left so there is a perception that it is “black” Tulsa.
- Crime is a problem in North Tulsa that affects fair housing. Creating jobs and reinvesting in the community may address this issue.

Loans

- Lenders are benefitting from word of mouth. This is especially true for predatory lenders who are providing financing to people who were denied by traditional loans.

Real Estate

- Real estate agents are capable of setting housing trends. They are able to steer clients into “better” neighborhoods, which eventually makes “better” neighborhood better and “worse” neighborhoods worse.
- There needs to be more dialogue between disability advocates and the real estate community to help rid the city of discrimination against the disabled.

Education

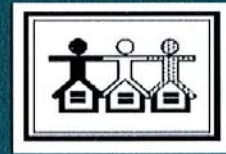
- There needs to be additional education regarding mortgage lending.
- Smaller apartment managers or individuals who rent properties need more education regarding fair housing especially in aspects such as reasonable accommodations for disabilities, familial status and racial profiling.
- Those who experience discrimination based on a protected class often do not report discrimination because they do not want to cause a problem or do not know it is discrimination. This sentiment should be addressed through education; individuals need to feel safe in reporting discrimination.
- People do not know where to go for first-time homebuyers programs. We should hold them in community gathering places in each community such as faith-based organizations.

- The African-American community has not been involved in Tulsa homebuyer's education classes historically but they were when a group brought the classes into churches. This should be organized again.
- Schools in north Tulsa have set up community schools for computer and parenting classes, the same could be done for fair housing, financial literacy and first-time homebuyer's classes.
- Tulsa used to fund landlord/tenant education workshops, which also provided a meal. They were successful and may be a good way to educate the public.
- The data and individuals in the forum frequently shared the sentiment that there is a particularly high amount of discrimination toward individuals with disabilities. This should be addressed through education of both landlords and tenants. Especially, small apartment complexes and people who own few properties.

Other

- HUD's definition of homeless does not include individuals who are recently released from prison because they frequently stay with friends or family. Finding housing for people with felony convictions is difficult. Although they are not protected classes, we still need to aid this group. Housing units owned locally are frequently more willing to rent.
- There needs to be additional enforcement of health and safety codes in the rental market to prevent slums.
- The reputation of certain school districts dictates where many individuals seek to buy their homes.
- There is a stigma regarding living in neighborhoods with high minority concentrations in Tulsa.
- Tulsa history set a historical context of discrimination and segregation that still affects fair housing choice.

Fair Housing Public Forums



The Fair Housing Act prohibits discrimination based on:

- Race or Color
- National Origin
- Familial Status
- Handicap
- Religion
- Sex



Join us to discuss
Fair Housing concerns

WE WANT TO HEAR FROM YOU!

DATE	LOCATION	TIME
Wednesday, April 13, 2011	Rudisill Regional Library 1520 North Hartford Avenue	2:30 p.m.
Wednesday, April 13, 2011	Dennis R. Neil Equality Center 621 East 4 th Street	6 p.m.
Thursday, April 14, 2011	Martin Regional Library 2601 South Garnett Road	9:30 a.m.

***Preliminary findings of the City of Tulsa's Analysis of Impediments to Fair Housing Choice Study will be presented.**

Reasonable accommodations will be made in compliance with the Americans with Disability Act of 1990 for those with disabilities or those who require an interpreter for languages other than English. Contact (918) 596-9084 by April 6, 2011 to request such arrangements.



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175 East 2nd Street, Suite 480
Tulsa, Oklahoma 74103
Phone: (918) 596-9084
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Equidad de Viviendas - Foros Públicos



La Ley Equidad de Vivienda prohíbe la discriminación por razones de:

- Raza
- Nacionalidad
- Estatus Familiar
- Discapacidad
- Religión
- Sexo

Ayúdenos a identificar los
Problemas de Equidad de Vivienda



Queremos escuchar su opinión!

DATE	LOCATION	TIME
Miércoles, 13 de Abril 2011	Rudisill Regional Library 1520 North Hartford Avenue	2:30 p.m.
Miércoles, 13 de Abril 2011	Dennis R. Neil Equality Center 621 East 4 th Street	6 p.m.
Jueves, 14 de Abril 2011	Martin Regional Library 2601 South Garnett Road	9:30 a.m.

***Recomendaciones preliminares del estudio de análisis de impedimentos de la Ciudad de Tulsa serán presentados en estos foros.**

Acomodaciones razonables serán proveídas en cumplimiento de la ley de Estadounidenses con discapacidades. Por favor llamar antes del 6 de Abril (918) 596-9084 si requieren acomodaciones.

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FAIR HOUSING FORUM MINUTES, APRIL 13 AND 14, 2011

Forum 1

We have been working to educate members of the community about fair housing. The information just shared with us is not much different from a report we wrote in 2001 talking about housing diversity and housing discrimination in Tulsa. I recently had a couple of meetings with the housing community that discussed items to impress upon the City during the Analysis of Impediments to Fair Housing Choice. Everything we talked about was discussed this afternoon. They really wanted to address steering and remedies for steering. We felt that one impediment was a lack of funding and organization on part of community-based organizations to act accurately while deal with housing issues. We also talked about real estate impediments such as an inadequate affordable housing supply. We could possibly bring back the employer-assisted housing programs that the City implanted with the assistance of Freddie Mac. There were at least seven companies in Tulsa who collaborated with the City and housing advocates to increase homeownership rate among their employees. We have known for a long time that there is an issue regarding African Americans and homeownership. There are also socioeconomic impediments.

The Partnership itself is a group of organizations that work together to advocate fair housing. We meet once a month, the third Tuesday, to discuss issues and to address housing education for citizens as well as people in the industry. We also talk about the latest announcements from HUD and the federal government. We encourage anyone to participate in the Fair Housing Partnership. The more people who learn about fair housing, the more homeownership will occur.

Does the city have fair housing testing and enforcement capacity?

The city has enforcement capacity but not testing capacity. Metro fair housing has testing capacity, which is establishing a Tulsa office.

April 21st we are hosting a fair housing workshop as an opportunity to learn about law regarding fair housing, landlord tenant issues and reasonable accommodation for individuals with disabilities.

The last ten to twenty years, the problems with practices have changed. How do you leverage this information presented into achievements? What are the key recommendation or key moves to make?

Certain actions need to be expressed in the annual action plan, which is directly connected to the AI. Typically, it depends on how much funding you are willing to allocate to fair housing. Usually, we incorporate a five-year strategy in the AI, which is incorporated in each annual action plan.

How do we leverage the CDBG money concerning fair housing?

That is dependent on your needs. It is a difficult balance because you cannot spend all of your funds on fair housing; there are infrastructure, community development and other programs that need to be fixed or funded.

At the end of the day, it is up to us to make a move.

HOP, Home Ownership Tulsa, was working while it existed. You can see an increase in complaints because of HOP. They had members of every industry. They made a great affordable housing structure in this city. All of a sudden all the funds were removed and this city had no more funding. We need to encourage the city to revitalize HOP. Money was flowing; things were happening; and people were held accountable for practices such as steering.

It is not just the City's responsibility to educate the public. It takes all of us, everyone in the industry, needs to help make this work. The City has the responsibility to make sure organizations follow the law and ensure some funding. We have already done many important things. The Fair Housing Partnership took on many education endeavors with no help at all. We want to launch as many programs as we can. We are going to continue doing what we do. Sub-prime lending could be seen long before the housing burst and no one did anything. It takes enforcement from not only the city but also the State and attorney generals office. I have spoken with the Federal Reserve Bank and the attorney general about what they can do to further fair housing. No one wants to talk about fair housing and discrimination. We have to address the lion now or move him into a cage so it cannot fight. The city cannot help unless they know the facts. We have to, as citizens, assist this process.

We have to work together.

Forum 2

I deal with Hispanic families and ask them why they choose to live in specific neighborhoods. They say that the Hispanic markets and businesses as well as the prices steer them to areas of Tulsa. I try to encourage them to drive by and look at areas such as West Tulsa but they want to stay in communities they are familiar with.

What area on the map is experiencing growth?

It is the Northeast section, north of 244 and east of 169.

Why is dispersion a concern?

It is just that there are high denial rates in specific census tracts. Maybe there is something going on within the lending industry.

Do you take into consideration the loan products available? Some of the products have changed. They use to offer products that were 100% finance or down payment assisted but those products may no longer be available. I do not know if that was taken into consideration.

I have a concern regarding families in rent to own situations. They are not adequately protected. Changes in loan approval process are forcing people into rent to own or lease to purchase contracts. These families have one foot in rental housing and one foot as a homeowner. The LLC and private sellers that run these rent to own organizations are not being monitored. The monitoring and reports they are supposed to submit is not occurring. I do not know where to send these families. For example, a young child was diagnosed with lead poisoning from lead based paint. They are in a lease to own situation and did not use a realtor. They are now legally responsible for fixing the problems because she "owns" the house. Nothing is protecting these families. Where do they go for protection, counseling and assistance? I have seen a large increase in this population because of the changes in loan regulations and loan product offered. All I can do is refer them to legal aid because they are in a legal contract with a seller. There are many housing right violations occurring. They are not being educated on inspection or lead based paint.

The federal budget was submitted last week and it eliminated housing counseling funds for 2011. That is a huge concern, especially in light of the issues we are facing. There is not going to be anywhere for people to go and found out about their rights or what they can do if they are discriminated against. These services also council people about how to purchase a home and their credit. We need to figure out how to ensure these services are still available in our community if this budget does pass.

APPENDIX E: ADDITIONAL SURVEY DATA

This section of the document contains tabulations of the narrative responses provided by participants in the 2011 Tulsa Fair Housing Survey. Each table presents answers provided in the question stated in the table title. Respondent answers have not been edited.

Table E.1 Are you aware of any questionable practices or barriers to fair housing choice in the rental housing market? City of Tulsa 2011 Fair Housing Survey
Comments
<p>A black co-worker has previously called advertised rental housing contacts about available units and has either not gotten a call back or has been told the unit has already been rented. I, as a white woman, call and get an immediate response and/or offer to show the property.</p> <p>Affordability in desirable high end real estate areas--is a barrier.</p> <p>as a landlord, i do not have equal access to those looking for housing.</p> <p>barriers from prev. page</p> <p>Certain owners only want people in their rent homes that reflect the racial composition of the neighborhood</p> <p>Discrimination against Hispanics based upon family size; not enough accessible units or parking spaces; gays not allowed to display rainbow flags or banners; etc.</p> <p>Disparate treatment in Trash service in North Tulsa, lack of services, goods, low performing schools, etc.</p> <p>Equal access to affordable and livable domains</p> <p>Fair housing shouldn't include gangs, drugs & multiple families living in one residence.</p> <p>Family makeup and race</p> <p>Fasley stating property has been rented, Raising the price, requiring excessive deposits, requiring monthly income be twice the amt. of rent, no children allowed.</p> <p>Hispanics have difficulty finding housing due to ethnic discrimination and discriminatory laws/regulations regarding legal status, number of individuals allowed to occupy single units, etc.</p> <p>housing for the poor seem to be centralized, which in my opinion creates an environment for crime, etc. If EVERY neighborhood and apartment complex was required to have a percentage of section 8 housing, then that population would be diluted over the entire city.</p> <p>How section 8 is utilized and/or accepted or not accepted in different areas of Tulsa.</p> <p>I understand that some young people are having a hard time getting housing due to defaults on student loans due to lack of being able to find a job for a period of time. Then once they find a job this is a problem with locating some where to live.</p> <p>In North Tulsa, the barriers are the fact that decent housing is very limited.</p> <p>It is difficult at times to rent to a family where no one in the household speaks English. It is difficult to communicate in person or through Notices.</p> <p>Land lords outside of North Tulsa are wary about renting to families with children and especially persons color.</p> <p>Landlords ususally shy away from renting to black or hispanic people.</p> <p>Language, single parents with large families, mental health, physical accessibility to some apartments and homes</p> <p>Large Back logg, unfair placement of people in questionable neighborhoods re: safety, access to a walkable community- including Healthy foods, transit systems.</p> <p>Limiting who can live at certain complexes</p> <p>location available</p> <p>Mixed race couples applications are delayed or lost. More extensive documentation for persons of certain ethnicity.</p> <p>Neither the City nor County of Tulsa bothers to follow up on complaints to the Adult Protective Services regarding the treatment of the elderly and disabled in HUD housing. The TPD doesn't give a shit unless there's a dead and bloody body. The TPD refuses to do diligent and full investigations when a landlord complains, allowing landlords to file false complaints that are never cross checked for the truth. This allows evictions that deny HUD supported housing to seniors and disabled for years afterwards, if not forever.</p> <p>On occasion, the media may use language in adds that could potentially violate familial status protected individuals when referring to numbers of people to a home, section 8, etc.</p>

private landlords often discriminate based on race by simply stating that the house is already rented until the renter comes along that fits their specifications.

race & income

Race and handicap accessibility apartments

Race, Section, Ex-offenders

Rental housing owners can discriminate against sexual orientation and gender identity. This should not be allowed!

Rental property in North Tulsa is extremely high compared to mid-and south Tulsa.

Rental rates allowed in Section 8 housing in North Tulsa

rentors being allowed to rent based on bad or no credit history. Also rentors who don't have a bank account for draft of payment. rentors being turned away for young children.

Section 8 housing and many landlords do not rent to felons or individuals with prior drug convictions - while I understand their reluctance - if a person completes a treatment program and is employed there should be some mechanism for exceptions. All this does is teach people to lie on their applications. A study completed clearly shows that these individuals are living in the housing anyway just under another name.

Some apartment complexes discriminate against Lesbian, Gay, Bisexual and Transgender individuals

Subsidized housing is a paradox to low income citizens due to fees for deposits, mowing, and other services.

Suggest that a certain percentage of new housing (e.g. - 5%), supported by local, state or federal funds, be committed to affordable housing and at least one unit be designed for those with limited accessibility.

There is a lack of affordable housing in all areas of Tulsa, not just the North or East. The "fair housing" in Midtown is typically not well maintained and rent is on average \$150-\$200 higher than in the North part of Tulsa, but it is still considered "fair" because the neighborhood has lower crime rates or better schools. But yet the houses are riddled with bugs and mice, bad plumbing and major foundation issues.

Unfair rental practices based on race, familial status and having signs stating no pets- Forgetting service animals.

Virtually impossible to police if apartment complex says they're full; says they don't keep a waiting list.

Wait period for rent assistance for low income seniors. Lack of assistance in some senior housing facilities such as Vintage Housing Properties.

Why does the government pay out such high assistance rent to home owners who rent to section 8 ? what doesn't the government monitor or limit how many section 8 homes can be in 1 neighborhood? Why doesn't the government make the rentee buy a home once they have been on section 8 for so many years? Section 8 rentors tear up homes and bring down the value of neighborhood because they know they will not be held responsible.

Table E.2
Are you aware of any questionable practices or barriers to fair housing choice in the real estate market?

City of Tulsa
 2011 Fair Housing Survey

Comments

Barring qualified minority entrance in the industry. Overpricing certain locations and lying.

Brokers and Real Estate Agents can discriminate based on sexual orientation and gender identity. This should not be allowed.

Certain real estate agents in Oklahoma have the mentality that people of color economically want qualify for most of their homes so they discourage you from buying a home.

Credit histories are examined and questioned for minor issues and required to meet additional standards if of certain ethnicity.

I do not believe the real estate industry tries to promote moving to North Tulsa

i know for a fact a real estate agent kept a house and lowered the sale price to a price in which in the end he bought it and did not negotiate with another potential buyer. too many real estate agents are owners of low income houses.

I'm not sure this applies. Absentee landlords should be held more accountable for the condition of their properties. Better screening of tenants and enforced maintenance.

In the past, Minorities have been passed over for retail and commerical facility purchases for their businesses

It is fairly usual for realtors to steer homebuyers to specific areas of the city and away from others based on their race.

Land lords in "good neighborhoods" are reticent to rent to "poor people," people with multiple children and persons of color.

New people to Tulsa are directed away from North Tulsa, with biases against the whole area instead of some pockets of the area.

New residents are steered to other areas in the city of least minority populations.

Not fair and equal in practice in North and Northwest Tulsa

Not sure, I have never had anyone register a complaint at the Dennis R Neill Equality Cetner

Once an area becomes gentrified, it becomes unattainable other than for the elite. Montreal subsidizes lofts/flats for even the blue collar worker or minimum wage citizen. If the credit history is blemished, then higher interest is charged by lenders for real estate.

Only being guided to look at houses in certain parts of the city

Race

Real estate agents who only show prospects one area (south side) of Tulsa

Realtors who steer clients away from certain parts of town or towards certain parts of town.

Red lining property in certain arears of the city

Redlining (happened when the SemGroup moved into Tulsa very blatantly), steering

Refusal of agents to return calls, if recognize race by voice

same here.

Second-hand: have heard of realtors actively trying to deter upper-middle income home-seekers from buying in and near downtown in favor of "safer", "proven" investments in south Tulsa and surrounding communities. No direct violation, but lots of undertones and implications. Second-hand: have heard of realtors actively discouraging families with children from locating within Tulsa Public Schools. Again, it's not denial of housing, but the steering has a net effect over time.

Selective parts of town are shown to potential buyers based on race. Negative comments have been made about living in North Tulsa.

Steering

Steering to certain areas of town.

Stirring of clients to stay out of low income areas

targeted real estate expansion in South Tulsa

The real estate industry is a barrier within itself

There seems to be an opinion in Tulsa that North is not as good as South. When I first started selling Real Estate I kept hearing from clients that they did not want any home North of a certain line. Like North of 11th Street or North of 21st St. Not being from Tulsa originally I found it surprising that Tulsa is so segregated, not necessarily by race but more by income.

Unfair lending practices based on race, credit etc.

When companies move people in they tend to show them the areas like Owasso, Broken Arrow or South Tulsa. I learned this information for several people that I talked with about Gilcrease Hills, the additions off Pine and Cin. and straight up Apache the addition across from Gilcrease Hills and farther down.

Yes Realtor steering potential buyers away from the north part of Tulsa Ok.

Table E.3

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

City of Tulsa
2011 Fair Housing Survey

Comments

Anecdotally, I still hear that it is difficult/impossible to obtain residential and commercial loans in parts of North Tulsa. This should be studied.

Because people of color are not the majority buying homes in this area relationships between the banks and the urban community are not establish. Most of these mortgage companies see the lack of credit or no established credit and never give an individual who trying to develop a strat for his or her family a change.

depending on race, not your credit, people of color our charge rates higher than caucasian

Failure to loan for home improvement, extra cost in insurance, lower appraisals and interest rates based on race.

Harder for minorities to qualify for housing loans.

I have in the past encountered a lender who made comments about a clients race.

i participated in a mortgage remodification program and after 18 months, and for 6 months where they ruined my credit, they finally found closure to the application. They argued that president Obama set a new rule but with no instructions. I had 2 credit cards, with -0 - balances, but used for bulk purchases closed. I was unable to save on special saving purchases during this period of time. As I tried to meet with local bank, I was told they couldn't help me, they could only dial the 1-800 number as I was doing. Very difficult time in my families life.

I purchased my first home in Tulsa in 1991 and was told I could not build it in specific areas of the city if I agreed to the loan.

If you live in North Tulsa, borrowing from the lending industry is not possible, unless you pay a high interest rate. We have to pay our "color tax".

In the past, Minorities were more likely to receive subprime mortgages and ARM's, which leads to debt and foreclosure.

Interest rates are higher for persons with low credit ratings which is a result of lack of education and often color. Credit must be established at an early age and, since many parents are not knowledgable, children need to be educated in school math classes.

minorities have a difficult time getting a home loan-held to a different standard.

Mortgage lenders can discriminate based on sexual orientation and gender identity. This should not be allowed.

Mortgage protection should be inherent just as fire insurance in closing costs.

Not sure, I have never had anyone register a complaint at the Dennis R Neill Equality Center

Once, about a year ago, a buyer told me his lender would not lend money on a particalar house because there were already too many minorities with loans in that area.

Placing higher rates to protected classes of people

Predatory lending

Race

Red lining approval of mortgages

Redlining and predatory lending

Requiring larger down payments from minorities, insufficient info to make wise decisions, higher monthly payments, deceitful tactics, not being informed of help that's available.

Same as above

Some discrimination in lending in North Tulsa

Some hispanic families that are undocumented were told that they could buy a house with a tax number only. These families did not have documentation to be in the country legally and at risk of losing their home at any time because they were not told of their vulnerablity.

sub-prime mortgagages offered to minorities...

Subprime lending, just the other day a mortgage company tried to talk one of my clients into getting an unaffordable adjustable rate mortgage with no documents.

We have come across lenders that prey on minorities and lower income individuals. They lie and mislead people into getting into loans they cannot afford.

What are all of those hidden charges and points during a "closing"? Why are the 3% rates only offered to the wealthy? Why not a flat rate for everyone and for the transaction. Why does the lender get to sell and make money off of our mortgage?

Yes Mortgage Companies steering potential buyers away from the north part of Tulsa Ok.

Zip Codes are used to red line loans.

Table E.4
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
 2011 Fair Housing Survey

Comments

Certain codes restrict building to accommodate citizens of certain income levels in mid town tulsa.

Contractor's not registered or using poor practices on low-income or people without construction knowledge

Enforcement of accessibility issues in Tulsa can be greatly improved not only for the the physically and mentally challenged but for all Tulsans.

Housing construction can discriminate based on sexual orientation and gender identity and this should not be allowed.

Housing construction needs to be built to green codes, offering every energy efficient product available --to pass the energy savings on to the buyer,who can actually afford the utilities once a homeowner. It costs no extra to site and construct a house for passive solar gains. Nor does it cost extra to specify the color white for every rooftop--be it commercial or residential. Instead HUD always goes with the cheapest bid, constructing buildings that are crap. Blame is often placed on the renter, or homeowner, but the truth is inferior materials, workmanship, and then inspections that pass code, on mediocre projects that is bad, and accepted as normal---all needs to cease. Let's return to pride and quality and build like we cared. Treat everyone with the dignity of kings and queens.

I'm not aware of any. I have 3 empty lots and have aggressively searched with what and how that lot can be used. No one out there to help me.

In attempting to secure a HUD Grant(Sec 202-Low Income Elderly), City of Tulsa Planning Dept Head refused to sign HUD 2991 that 20 units of elderly housing was consistent with City Plan. Thus, impediment to Housing. Mayor had to take over and sign for City. Very irregular!

insufficient understanding of what is required for housing to be truly accessible.

It is common for builders to be less educated about fair housing law than they should be or are required to be. It is common for job sites not to post the required posters regarding fair housing.

Local minority construction companies are often passed over for bigger construction companies for bids.

New construction loans geared toward certain sections of the city

Not sure, I have never had anyone register a complaint at the Dennis R Neill Equality Insurance

Second-hand: Have heard that bids for public projects in North Tulsa are expected to be higher because construction companies charge extra for "site security", namely fear that equipment will be vandalized or stolen. Anecdotal. It does seem to me that in North Tulsa I am more likely to see construction equipment stored behind temporarily-erected hurricane fencing. Perhaps, having heard about the situation, I am more likely to notice this in North Tulsa.

Suggest that a certain percentage of new housing (e.g.- 5%), supported by local, state or federal funds, be committed to affordable housing and at least one unit be designed for those with limited accessibility.

There are apartment complexes across Tulsa that have been built in the past 10 to 12 years that do not meet accessibility compliance. Construction companies have also failed to post Fair Housing posters at their sites during the building process.

Yes Realtors and mortgage brokers steering potential buyers away from the north part of Tulsa Ok.

Table E.5
Are you aware of any questionable practices or barriers to fair housing choice in the home insurance industry?

City of Tulsa
 2011 Fair Housing Survey

Comments

All the insurance companies are too expensive for the Residents of Owen Park.

as a commerical property owner, i have great difficulty finding commercial property insurance. I have one company, but never another one to shop around with.

Being charged higher rates for being in a certain class of people and or which area of town you reside in

Bias in approving homes for coverage in north Tulsa.

Charging higher rates to the people that can afford it least.

Cost of insurance is largely determined by zip codes.

disparity in rates as per one's zip code. this may occur nationally, not sure.

I have clients who have paid insurance only to find out that the agent never turned their paperwork in and the insurance is invalid.

I have no experience.

I was informed by some one that I know that it is harder for Black to receive fair insurance rates because they were considered a higher risk for paying.

If you've filled what is considered "too many" claims you can be denied coverage

Inflated prices for insurance in "undesirable neighborhoods", inability to insure in "undesirable neighborhoods", inadequate coverage

Insurance companies frequently (redline) housing. Otherwords, will only insure houses based on a minimum value.

Insurance companies, in the past, have generally conducted forms of redlining increasing the cost of insurance premiums based on allegedly high crime areas. It should be noted that these areas have always been heavily populated by people of color.

Insurance does not pay as much for damages, longer to pay.

Insurance higher in North Tulsa due to the assumption and media perception of it being a high crime risk area. The true facts and crime rate numbers do not reflect this and does not show North Tulsa to stand out above other areas of Tulsa

Mortgage protection insurance should be inclusive.

rates geared to ZIP CODE

Red lining practices

Residents in North Tulsa pay a higher rate for home insurance. We are "red-lined".

Some agents prefer not to work with same sex couples.

The cost of this is outlandish.

The home insurance industry can discriminate based on sexual orientation and gender identity. This should not be allowed.

The housing market is high risk currently, so finding affordable house or renters insurance is no simple task.

unfair hiring praties or awarding contracts to minority companies

When you have all the other issues above working against a part of your city other issues like crime, education, health care and home ownership, insurance are all affected.

Who is lending to the working class, if they have been unemployed, gotten behind in payments? There are folks who have been filing for bankruptcy? What is our community willing to do for them? Some areas have 40% property vacancy? How can we rebuild the community, repurpose the abandoned houses--remodel green.

Table E.6
Are you aware of any questionable practices or barriers to fair housing choice in the home appraisal industry?

City of Tulsa
 2011 Fair Housing Survey

Comments

"Comps" (nearby comparable properties) are a big limiting factor on the amount someone can borrow. The ability to revitalize a neighborhood is hampered by what appears to be a self-reinforcing practice of choking off financing with low appraisals. In this case, loans seem to be attainable, but not in amounts that would allow for significant renovations. The industry could benefit by being allowed, under certain circumstances, to use comps from OTHER COMMUNITIES with more mature and successful neighborhood revitalization programs. Racial minorities are concentrated in these same poor neighborhoods in and around downtown, North Tulsa, and East Tulsa.

again, as a commerical property owner, i cannot find an appraiser for the types of units I have. houses built in 1930, a quad, several unique units making finding an appraiser with ease.

Appraisal frequently low balled based on interest of the other, not the renter or owner, in communities heavily populated with minorities.

Appraisals are deflated in North Tulsa.

Appraisals are not fair and equal in North Tulsa

Appraisals of property in North Tulsa is usually very low, as compared with other areas of the City of Tulsa.

Homes generally lose value, or have a slower increase in value, when in areas heavily populated by minorities.

Houses in low income areas at the same sqare foot ratio are penalized to an extreme loss for home owners in resale value.

I have no experience.

If you do live in a certain area of town, your home is more likely to be appraised at a lower amount

Lower appraisals in North Tulsa and Gilcrease Hills area.

People who OWN homes and live in them are penalized by lower appraisals due to "fair housing" allowing people in that tear up the neighborhoods. The economy doesn't begin to touch this problem.

Red lining practices again

Same little two bedroom houses on Riverside are twice the value of similiar house in North Tulsa.

Some mortgage companies had their own special appraisers who would appraise properties the way they wanted them to be appraised and not on the true value of the property based on the comps in the area. HUD has tried to reign the appraisal process in but there are still appraisers and mortgage companies who slip through the cracks especially in the rural areas of the city and county.

the home appraisal industry can discriminate based on sexual orientation and gender identity. This should not be allowed.

The owner has no say in the avaluation.

Unfair steering or raising rates for the protected classes.

When you have all the other issues above working against a part of your city other issues like crime, education, health care and home ownership appraisal, are all affected.

Table E.7
Are you aware of any questionable practices or barriers to fair housing choice in any other housing services?

City of Tulsa
2011 Fair Housing Survey

Comments

All housing services can discriminate based on sexual orientation and gender identity. This should not be allowed.

Businesses charging more to come to north Tulsa for housing repairs

Code enforcement is more lacking in North Tulsa, Police don't try to investigate crime, the "good police" protect the criminal and his/her rights to stay on the street and harass the law bidding citizen. Never see a street sweeper in North Tulsa. Even state and federal buildings and facilities are dirty and unkept in North Tulsa, post offices, the national owned banks are yards are dirty, Dollar Store on Peoria, Bank of America lawn and parking lot is dirty.

Discrimination exist in protected classes

Expand the applicants for CDBG. The same agencies show up and awarded the grant funding. I left after being the 22nd on the list, to suggest green remodel of abandoned properties.

Housing is directly related to school and education of citizens, thus a low income housing district also has more at risk schools and less funding for growth and development, yet, school districts receive a vast amount of funding for low income or at risk students.

I believe much more could be accomplished with the use of email, faxing, etc. Tulsa Housing still operates with the requirement of USPS mail only. As I find need, I have only one contact with them, and when she's out, I'm out of luck.

In city planning, Tulsa has a decades-old pattern of creating large-scale apartment complexes near OTHER large-scale apartment complexes. There is a rational explanation for this, but the net effect over time are large concentrations (thousands of units) of "affordable" rental units clustered in a handful of geographic areas. Most notable is the collection of apartment complexes on South Peoria (near 61st). The character of this area has changed over time: The first rental products were market-rate apartments near the River. Over time, more complexes were added because it was easier to obtain multifamily zoning if the subject property abutted OTHER multifamily zoning on at least one side. Years later, when the first of these properties started showing signs of age and rents declined, the others quickly dominoed behind them and this area is now a poverty pocket. Like most other neighborhoods in Tulsa, income and race track closely, so it is not fair for INCOG to characterize these as a series of exclusively market-driven, or even plan-driven decisions. There is a strong racial component. This part of South Tulsa is often referred to as the "New North Tulsa". It's an ugly situation that city planners could have predicted and remedied. Best planning practice would be to diversify housing options geographically. To use city plans to encourage mixes of single and multifamily, rental and owned, etc. The NEW comprehensive plan accounts for this, but it does not undo decades of harm.

Inadequate accessible public transportation.

Inspections and title companies - fees for services sometimes vary more for single female head of households and seniors.

It is questionable as to whether COT provides equitable service to areas of town who have historically been predominated by minorities or people of color.

Re #4. Grace Apoltolic Temple, Inc. (Dr Tyler, 1010 East 56th, Tulsa, Ok was attempting to increase low income housing in Tulsa. Little support by City Planning. Regretably, \$2Mil+ awarded elsewhere (2009).

We have had registered complaints from home owners associations not being welcoming or accomadating to same sex couples in certain neighborhoods.

Table E.8
Are you aware of any questionable practices or barriers to fair housing choice in zoning laws?

City of Tulsa
2011 Fair Housing Survey

Comments

(Ah, see previous question. Didn't see this coming.) Historically, it has been easier to obtain multi-family zoning if a subject property abuts other OTHER property zoned multi-family property. The effect over time is that apartments are precariously concentrated into geographic pockets. As apartments age, the pocket quickly dominoes into a concentration of poor, predominantly minority, groups. Note this apparently has little to do with Section 8 housing, though Section 8 is often a scapegoat.

City needs to enforce the current laws

City removed most of the commercial zoning in North Tulsa. Cost more to do business in North Tulsa, with less traffic and locations to operate.

Form-based codes need to be implemented citywide--not just pilot project in Pearl District. We need to base design off of human patterns instead of cars.

Have personally looked into the possibility of new development residential/commercial in areas that would increase housing value. Vacant land deemed wildlife preserves in (ex. SE corner - 36th Street North and Peoria)

It is questionable whether industrial facilities are allowed greater access to neighborhoods more heavily populated by minorities, resulting in higher risk to varied pollutants.

Need more businesses and services in North Tulsa. Overhead, especially insurance is so much higher for the same business in other areas of Tulsa without true cause. It is based on "business as usual" and old practices of Tulsa's operating systems. Our church in North Tulsa had to jump through hoops for years just to get a parking lot built on their land.

No one knows what zoning is. BOK locked up the use of vacant properties in west Tulsa? Well, that is what our neighborhood thinks. Never know where to go and how to get an answer which is understandable.

questionable businesses too close to schools and children

Residential neighborhoods are re-zoned to commercial and this often results in the homes being turned into bars and other inappropriate establishments for homes in lower income areas.

The City of Tulsa is wanting to enact Zoning that limits how many people can live in a house and Tulsa is a very NIMBY Community when it comes to housing complexes. One good example is the Building Tulsa Building Lives complex on North Yale Avenue.

The Zoning Ordinance needs to be updated to more current standards.

We have had issues with group homes and zoning and the definition of a family in Tulsa in the past 2 years. Also zoning in regards to homeless facilities in neighborhoods has created some NIMBYism.

Whether zoning laws are in place or not, Tulsa neighborhood associations and/or residents frequently protest "affordable housing" proposals for any number of protected classes.

Zones are designed to favor South Tulsa for political reasons. Resources are directed more toward S. Tulsa.

Table E.9
Are you aware of any questionable practices or barriers to fair housing choice in land use policies?

City of Tulsa
 2011 Fair Housing Survey

Comments

Again, the land use policy may legally allow an entity to develop affordable housing but the NIMBY coalitions grow stronger and more organized with each 'success story'...

Change with our regard to the persons using parks. For example the proposed development of the Arkansas river has always been directed towards middle and upper class citizens - not persons of lower incomes who fish there.

City destroyed North Tulsa, with subpar services, zoning, police services, streets, city employees that do pick up trash spread it all over the streets each week.

depends on the zip code- if codes are in lower economic areas- differences are made.

Habitat for Humanity houses don't fit with the era of Owen Park Neighborhood.

I think the current land use code should be upgraded to implement a more walkable sustainable community

In some parts of the city, land is zoned industrial, which disallows residential construction on these tracts. The residential need cannot be filled.

It is questionable whether industrial facilities are allowed greater access to neighborhoods more heavily populated by minorities, resulting higher risk to varied pollutions.

Just look at the difference in land use in South and East Tulsa vs. North and West Tulsa. A picture says a thousand words. There is much land in North Tulsa that could be used, but instead South and East Tulsa is being crowded out.

Large concentrations of apartments that are distant from employment centers and inadequately served by transit reflects the LACK of a coordinated land use and transportation policy. This problem was identified during PlaniTulsa, the recent update to the city's comprehensive plan. New practice would be to introduce multifamily in smaller concentrations between commercial corridors and abutting single-family neighborhoods. The properties would be close to employment and transit (along corridors) and would feature a more diverse mix of rent levels and ownership opportunities than featured in traditional, large-format, garden apartment complexes.

my vacant properties remain vacant and I can't get anyone to give me any idea on what can be done.

Refusing to issue permits to build in certain areas.

see above

The city has land banked a lot of property in North Tulsa restricting flexibility in housing and economic development.

The city zoning laws are not current and are not family friendly.

Tulsa does not do a very good job of explaining land use policies to citizens. This creates or perpetuates NIMBYism and expensive law suits that hinder community development and economic growth.

Using subsidized housing to operate gang activity and drugs hurts the city. The activity has spread into large areas, affecting homeowners.

We don't need a full scale Walmart parking lot for every business and cafe. New Urbanism concept to enhance quality of life. More community gardens, sidewalks, allowing for pedestrian walking and biking, green space, year round farmers market, urban agriculture centers, etc.

Table E.10
Are you aware of any questionable practices or barriers to fair housing choice in occupancy standards or health and safety codes?

City of Tulsa
 2011 Fair Housing Survey

Comments

ADA violations

Ban smoking in public places would be my support for healthy standards.

Group housing for those living with HIV/AIDS

health and landlord/tenant laws not enforced

How many families can live in subsidized housing? As many as they want. How many men can move into single mother's apts. or homes that receive help? As many as they want.

I represent the majority of the enforcement of these codes

I think we have an excellent health department who remains ready and able to work with questions I've had.

ignored in lower rental properties.

It is questionable whether industrial facilities are allowed greater access to neighborhoods more heavily populated by minorities, resulting in higher risk to varied pollutants.

Life expectancy is lower because of lack of health services and clinics. If a building is burglarized police never come. Sewer system old while we built sewer systems in all these suburbs.

Local officials don't have enough enforcement staff or power to enforce current codes

Many people don't have a clear understanding of the Keating Memo and how it is applied on a case-by-case matter. No to the health and safety codes they are pretty clear cut.

not enough enforcement and inspections

The conditions in which Section 8 housing is accepted

The rules are not being enforced very well.

the use of cheap materials that break down - roofing that leaks in a few years, causes mold issues, and inconvenience.

There are few if any regulations requiring that rental property be habitable regarding mold and other allergens, toxins and pathogens. This is especially hard on those with health conditions and some disabilities.

There are many slum lords in the City of Tulsa who do not provide safe, decent, sanitary housing and take advantage of people with no credit or desperate for housing. Place them in homes that are not even up to code, have no water, furnaces or even insulation.

This is

This response is primarily directed at cultures that honor extended families; over-occupancy is an open secret among Hispanic and Asian populations in need of safe, decent and affordable housing.

we still have slum lords!

Table E.11
Are you aware of any questionable practices or barriers to fair housing choice in property tax policies?

City of Tulsa
 2011 Fair Housing Survey

Comments

Although there has been very little improvement in North Tulsa, the real estate taxes increase every year. This is so unfair.

Changes repeatedly without any clear rationale (property values)

I find it strange that the property tax out north and west or just as high or higher than some out south but yet they do not have the same number or services, schools or companies in the area. No one has been able to explain this matter to me everytime I ask the question. It is always well it depends on the construction around you or the things in your neighbor hood that is just it their is no construction or things in my neighbor hood other than one school.

I'm on a fixed income. But my taxes keep raising. At this rate, when I'm in my upper age bracket. I won't be able to afford to keep my home.

Inequities in pricing

Need more breaks for low income senior citizens.

Not that I am aware of.

Old but services are so bad no one would vote to increase them. The services would just be moved out of the area.

since a cap of 5% was voted in, our taxes have gone up 5% each year. Before it varied.

tax relief for affordable housing

This one is a loaded question. I think some people would say that the way property tax is structured puts a greater burden on people living in higher income neighborhoods, because they have a higher tax rate. Obviously they have higher tax assessments--which is their choice--but the tax rate is out of their control.

Too high tax policies.

Would support paying quality teachers and programs, fewer superintendents, pay more in line with teacher pay.

Table E.12
Are you aware of any questionable practices or barriers to fair housing choice in housing construction standards?

City of Tulsa
 2011 Fair Housing Survey

Comments

Few requirements with respect to accessible housing and its advertisement.

Houses are "shoddy-built" now with faux wood that is really particle board.

Howevr, would suggest that a certain percentage of new housing (e.g.- 5%), supported by local, state or federal funds, be committed to affordable housing and at least one unit be designed for those with limited accessibility.

Just take a look at North Tulsa vs. other areas of Tulsa

Locally, need to adopt the more current ICC building codes.

Mandatory energy audits as part of green codes in new construction. Incentives need to be offered for existing construction.

Not as high of requirements in rural & depressed areas

Not that I am aware of.

Once you build the appraisal will not be there to get the loan.

Poor insulataion; increases utility bills

Property Assessed Energy Lending Districts , for green code upgrades

Usually lower standards accepted for construction in lower income areas (less concern for quality)

Table E.13
Are you aware of any questionable practices or barriers to fair housing choice in neighborhood or community development policies?

City of Tulsa
 2011 Fair Housing Survey

Comments

Bias toward the wealthy in improvements, recreational facilities, groceries and other retail establishments.

City of Tulsa impacts housing and economic development through infrastructure.

code enforcement not enforced were needed. Absent landlords allowed free range in certain area.

Community development has historically been lower in areas heavily populated with minorities.

Community development policies caused most of the problems. Misuse and abuse of Community Block Program. Employees responsible were incompetent or just follow the racist past. Look at the park system in North Tulsa.

Community does not have input in the policies if the area is north of Archer.

Community Engagement and crime watch

Fair market community development is limited to specific areas of the city. There has been no development of apartment home in North Tulsa. All apartment complexes in North Tulsa are public housing complexes.

Historically, neighborhood reinvestment programs were not geographically precise. At the traditionally low funding levels, rehab and development were occurring over vast areas, but funds were rarely concentrated in a comprehensive way, and for a long enough time, to help any one neighborhood turn a corner. Funds were expended legally, but not always in a way that had compounding benefits. This is a political problem.

I have tried hard for community development and improvement to our neighborhood. It is obvious, look at west Tulsa sidewalks and curbs, then go to south Tulsa. Honestly?

If at vested, Monetary interest is not taken in undeveloped parts of the city, comunity development will be at a perpetual standstill.

If there are some, I am unaware of them. I do know that the Prioritization Committee for CDBG funds holds public hearings to determine the areas of the city with the greatest need for community development, but the City of Tulsa has never articulated or distributed any information regarding neighborhood and community development policies that I am aware of to date. I have lived here for 50 years.

It appears that some communities have more stores and better recreational opportunities for the citizens. This is unjust.

less to no money invested in low & moderate income neighborhoods.

local policies enacted without equal balance for economical development for entire city of Tulsa

Most development is South

North Tulsa is the least developed area of the City. This is largely due to the racial make up of the area. There is a lack of code enforcement in North Tulsa which leads to dilapidated and unsafe housing stock in the area which in turn detracts from the curb appeal of the area.

North Tulsa residents often times cannot afford the internet or the newspaper. Incentives such as free internet service for Neighborhood Ass. President/leader could be great tool for safety/neighborhood watch, as well as information for Free Landfill Day, job postings, workshops, conferences.

north tulsa, does not get the community development that is needed for improvement to our community. We do not need another drug rehab place, we need businesses out north for a more balance economic growth for the city of Tulsa. right now if you want to go to mall you either have to go south.

Not in my backyard

Same story regarding North and Northeast Tulsa vs. South and Southeast Tulsa

Service industry must meet additional standards for permits.

The neighborhoods that most need assistance, either don't get it or don't know who to contact to start improvement

This is the most detremental area that impacts citizens of various areas of Tulsa. The city leaders have and are practicing beigne neglect as far as development, and improvement are concerned, especially to the residents of North, East and West Tulsa.

Too much uninformed NIMBY; not enough acceptance of housing for disabled and minority markets.

We have had several complaints registered at the Dennis R Neill Equality Center regarding discrimination against same sex couples in neighborhood associations.

You let them spread out. When they move into a neighborhood that is cleaner, quieter and better.....then bring their old people and problems with them it trashes all of us.

Table E.14

Are you aware of any barriers that limit access to government services, such as public housing, transportation or employment services?

City of Tulsa
2011 Fair Housing Survey

Comments

Access to public transportation is very limited in neighborhoods that need it the most

ADA self-assessment study is underway by the City of Tulsa that identifies and is to address physical barriers t access.

Affordable housing for ex-offenders; no local policy established by city on hiring

Bias against North Tulsa areas regarding bus routes in the evening and locations to be picked up and dropped off for busing.

Bus lines stop operating after evening hours, have very limited operations on Saturday and don't run at all on Sundays. This has a direct impact on persons relying on public transportation who often have to work at hours when Tulsa Transit isn't running.

Buses don't go where I want, when I want to go.

convenient metro transportation

How many employment services are in North Tulsa vs. other parts of town?

I am not sure how this question applies to Fair Housing Impediments, but access to employment services can take a person with no vehicle using public transportation a minimum of an hour to get to the site and an hour back on a good day. Public transportation to housing sites can take 30 minutes to an hour and then you might have to walk an additional mile to actually get to the site you are seeking. The Public Transportation system here is not very well organized. It should be on a more accessible grid system for easier access.

I believe the requirement of having to come to the office and having to spend time away from my job to take care of questions and concerns is a barrier. Email and web sites, when provided for citizen use could be a better tool.

Ironically, the above-referenced "poverty pocket" of garden apartment complexes on south Peoria enjoys, relatively speaking, a better level of transit service than other parts of the city, but I don't think this was by design. Quite the opposite, it was a consequence of locating a large population of poor workers in an area with few employment prospects. Overall, the transit system in Tulsa is completely dysfunctional. Evening and weekend service is virtually non-existent, rendering it inadequate for a large portion of the working population. Our public transit system prevents access to government services, employment, health care, and education. Having no reasonable public transit option, private transportation is imposed through neglect. This effects poor and minority populations disproportionately.

Lack of public rail

Language, there needs to be information on these services in spanish.

Language/ translation issues, the bus service is very inadequate and casues a barrier to housing outside the bus "Routes"

Limited transportation or employment opportunities in North Tulsa

Most of the policies have a disparate impact on development and services in North Tulsa, no commercial zoning, no tax base excuse to deny governmental services.

MTTA doesn't generate enough general ridership to subsidize a comprehensive public transit system. A few local non-profits and faith based efforts exist to provide 'garage services' to those with inoperable or poorly operating vehicles. Lackof transportation prohibits a large group of residents from getting to employment centers or employment training.

North Tulsa has the highest unemployment rate yet the least amount of access to employment services. Also, public transportation is not accessible during times when many lower income people work.

oh, i am sure there are. tell me what the barrier is to having trash service in North tulsa once per week and two times per week in South and West tulsa.

Our transportation is very limited and although it exists, doesn't facilitate access by Tulsans to government services or employment

public transportation needs a big upgrade with services available to accomodate varied shifts.

The city's public transportation is not easily accessible, nor is it a efficient method of transportation for North Tulsa community members. The time spent commuting to and from work is excessive and there are very limited job opportunities in the North Tulsa Community.

The Lift ends at 9:30pm for the physically limited. If they wanted to go to a performance at the BOK arena that runs past this time-- too bad. Turley residents, many in the service industry, only have one bus route on Sunday. More frequent and more often for those w/o a car.

There is not enough public transportation provided for the city. People without vehicles have a difficult time moving around the city.

transportation has always been an issue for the disadvantaged in Tulsa to access services

Transportation is always a problem to get them to all the offices spread through out the city

yes section 8 housing as previously disclosed and while I am told the transportation in our city is better than most we have a dire need to increase bus routes that are timely. It impacts a persons ability to stay employed and care for their family.

Table E.15
Are you aware of any fair housing compliance issues with any public housing authority?

City of Tulsa
 2011 Fair Housing Survey

Comments

enforcement

I find it very interesting that Tulsa's Housing Authority is under the control and management of majority individuals who do not have any knowledge of the needs and desires of those who need their services.

Individuals with disabilities - Accessibility and Accommodations

Insufficient accountability for rent/voucher payments, resulting in some erroneous evictions or requests for extra payments

It has been difficult to get them to make reasonable accommodation for disabled individuals.

only an opinion, but i have alot of clients who are basically forced to be in jail, transitional living or homeless because of the laws

People who need housing the most are disqualified due to prior felony convictions -- screening process needs to be examined.

Seem to have changed but not sure of the effect it will have on improving things. If poor whites are moved back North will good, benefits and services improve? Still racism, treatment based on race.

Shadybrook Senior Apartments elevator out for 2 1/2 months. Houses senior citizens and disabled. Disabled residents crawling down steps and borrowing wheelchairs from neighbors.

The housing authority needs to better train and monitor all of their staff to better understand fair housing law. We have advocated for public housing tenants who were told by PHA staff that they would have to move because they had too many children (familial status).

There's no accountability of maintenance on units to accurately correct problems in a timely fashion.

We have had a few complaints with section 8 housing but these were quickly resolved.

Table E.16

Are there any other public administrative actions or regulation that act as barriers to fair housing choice?

City of Tulsa
 2011 Fair Housing Survey

Comments

Little co-operation by Tulsa Planning Dept to Grace Apostolic Temple's Fund Reservation application to HUD to build 20 low income elderly housing units. Would not certify housing was consistent with Tulsa Consolidated Plan! Mayor saved the day and did certification.

Little to no enforcement in city, state or federal discrimination laws.

Occupancy standards that the City wants to set aside, ordinance being written to limit the number of Group housing and homes in certain neighbourhoods that are already Zoned for the housing the City is trying to eliminate.

Problems with the City's Department of Grants Administration's ability to quickly and efficiently obligate funds for allocation to safe, decent, affordable housing options seems to be an on-going issue.

The Tulsa District Attorney is biased towards landlords, if not bigoted towards the disabled, especially those with mental illness, and cannot be trusted to find the truth in a dispute.

This survey is an example because it can only be answered by citizens who have access to computers, therefore it is already bias.

Totally ignorant of Tulsa's laws and policies.

Tulsa fair housing policies discriminate based on sexual orientation and gender identity. This should not be allowed.

White privilege makes those in authority blind or indifferent to the issues that persons of color face. There is no real need for whites to change, because they don't have to empathize or face the same challenges in their communities for resources. Nothing to prompt more awareness or challenge practices allowed by privileged status.

Table E.17

What are the geographic areas with fair housing problems and what types of issues do these areas have?

City of Tulsa
2011 Fair Housing Survey

Comments

"such as telling some people an apartment is available but telling others that it has been rented." This happens daily at high end apartment complexes and rent homes.

All over Tulsa

All public housing is far North, east, and west and on the outside of the city.

Broken Arrow, Tulsa County.

Every area of Tulsa, more in the North and East, but the issues exist all over Tulsa.

Have had an occurrence where I was showing in South Tulsa (Jenks Schools) and a neighbor approached me about the clients I was showing. I just let the neighbor know that I showed clients what they wanted to see and that I could not discriminate.

I'm assuming low income areas like areas in North Tulsa, or West Tulsa

Lack of affordable housing opportunities (historically bad land use policy) and transit (inadequate funding for public transit) in south Tulsa (with the exception of south Peoria) have kept poorer and minority populations concentrated in traditionally poor pockets and away from potential employment centers.

North & West Tulsa

North and East because of perceived high crime; racial discrimination, mortgage relining, and

North and East Tulsa

north and west

North Tulsa

North Tulsa West Tulsa (All in the lower income demographic areas) East Tulsa

North Tulsa - Predatory Lending and realtors steering people away from the area.

North Tulsa and East Tulsa. Slumlords, condominiums and apartments that do not know about fair housing and are discriminatory. This issue has been a problem for years and no one is dealing with it or educating the private apartment industry about the regulations. They easily prey on those who have no knowledge of the regulations

North Tulsa and pockets in east, west and south Tulsa

North Tulsa has been the "dumping" ground for all the "have not's" and "want not's" we as a community need to not only spread the wealth but spread the service, growth, revitalization, and support to all areas of Tulsa,

North Tulsa in particular has historically disregarded and disenfranchised.

North Tulsa. Fair housing laws are to make housing available but redlining has caused most investments in North Tulsa to be unprofitable.

North Tulsa. Lack of infrastructure and discrimination by lenders, realtors and insurance companies.

North Tulsa. Much has already been mentioned above

North Tulsa. The quality of the housing stock

North, South and East Tulsa - familial status, disability access, mental health, source of income, age

north, west and east tula

Northside & West Tulsa.

Northside and Eastside; understanding ADA and fair housing issues and requirements

Oklahomans for Equality maintains public housing, neighborhood associations, and welcoming neighborhoods data for our membership when they are looking to move in to a certain area.

Possibly the northern and eastern parts of city limits that have higher populations of minorities.

South and southeast Tulsa seems to have Realtors and landlords who close ranks and screen certain classes.

South of Archer

South Tulsa

South when certain groups look at houses realtors sometimes make comments such as the cost of the house that I felt would not have been made to another group and yes I am a Professional person with a college degree both me and my husband. Which is strange now days since most people require that you qualify before looking for a house.

south, racism

The apartment complexes on 41st and 129th Street, have multiple fair housing violations. These violations are concerning the physical conditions of these apartments. No one reports them because most of the residents are undocumented.

the low-income areas...

There are no fair housing/affordable currently inside the IDL that I would live or want my children to live in.

Those areas in north Tulsa are of significant deficiencies when compared to those of south Tulsa.

Too much in east Tulsa! How is this fair to home owners? Our property is now worth crap.

west side

Table E.18
How should fair housing laws be changed?

City of Tulsa
2011 Fair Housing Survey

Comments

As with any law, the enforcement of that law is only effective as the agency assigned to enforce it. HUD-FHEO has been quite proactive in providing local agencies incentives to enforce Title VIII.

At least 1 member , of a reasonable age, must be in a household to be able to communicate.

Better enforcement by City of Tulsa.

Do what you say and don't play! Don't lie, cheat and misrepresent your housing rules to get the consumer to buy into a scam.
don't think so

Enforcement does not exist. People in power aren't interested, racist, or just dumb.

Enforcement should be a priority. Too often an apartment complex can be written up but will reoffend in 6 months with the same issue.

I believe there should be a complete financial evaluation of properties are managed and maintained. There doesn't appear to be case by case analysis of units independently.

Let's bring the UD back into HUD. Urban Development that is fair and equitable, energy efficient, made with quality,w/ bike racks, recycling, composting, edible landscaping and green space nearby, easy access to education and work, with mass transit offered often and consistent, in a safe zone.

more education and enforcement

Needs a better system in place to hold employees accountable.

Recommend telephone Hotline for complaints on landlord neglect; more consistent enforcement of health laws

Should be enforced not changed

The City of Tulsa needs to apply for a FHIP Grant and work hard at educating the apartment community, register the landlords and educate them. Out reach is very important to those who do not have e-mail who are the ones that need the help. The City of Tulsa needs to become proactive. People should not have to rely on only one certified agency in the state to deal with the fair housing issues.

the laws tend to cater to the minority groups in north tulsa, by pushing these groups to north tulsa you centralize crime. i believe the term is gentrification

There should be more field research done to inspect compliance of landlords and homeowners, as well as realtors and inspectors.

They don't change the situation people were in. the problem just moves with them.

To require the TPD and DA to do full investigations regarding complaints.

Table E.19
Please share any additional concerns regarding fair housing?

City of Tulsa
2011 Fair Housing Survey

Comments

Additional education on Fair Housing for the Tulsa area would be beneficial. Additionally, more testing would benefit the area as well. This would help to better identify if Fair Housing Laws are being followed.

By and large we find the Tulsa Housing to be fair and open to lesbian, gay, bisexual and transgender Tulsans. We find some areas to be more welcoming and some property managers do aggressively market to the gay community assuring them they will be welcome.

Fair housing laws should not discriminate based on sexual orientation and gender identity.

How to better educate public and businesses on current fair housing laws and policies

I don't see discrimination in our area. The most discrimination is generated from personal limitation consumers are placing on themselves feeling uncomfortable outside of their "comfort zone," cliché as it may sound. People seem most limited by their knowledge and less by someone else's imposed restrictions. Additionally, consumers are limiting themselves by their lack of fiscal discipline in controlling their budgets and spending. All sizes and colors are more inclined to blame their problems on someone else's success rather than their irresponsibility. Can we get this inserted into our training programs? (really) In 20 years of serving Tulsans, I have only been confronted with three cases of discrimination... from ignorant home sellers. Those ignorant home sellers are the one's who lost... not the buyers. Home sellers don't turn down buyers who have money to purchase (especially in this market) and landlords don't turn down qualified tenants who have decent credit, a job, and don't sell drugs.

I have been here for 20 years and work for the City and it saddens me that we do a poor job of educating the public and those who really need the Fair housing laws. This community does a poor job of protecting those who are in need of the service. We need to be more vigilant. Instead of enforcing code violations and sending notices from the health department we are in essence displacing families and not going after those landlords who clearly are violating fair housing regulations. The City needs to do a better job of educating the Inspectors and dealing with Fair housing issues that lead to violations in a pro active way. The City of Tulsa needs to apply for the Grants available and pursue them. We need to protect the citizens of Tulsa.

I know one of the most difficult areas to enforce is advertising. It is amazing the words we are not supposed to use. For example, if I have a property listed on the market, and it is a 5 bedroom, 4 bath home, I am now allowed to say that it is "great for a large family" because that could discriminate against every other type of person. Some of the law is silly--and that is one example. As though people other than large families cannot figure out all by themselves that the house could work for another demographic. However, I agree with Fair Housing in principle, because it does mean that every house has the opportunity to be shown to the greatest number of people; and, every person has the opportunity to see any house that they can afford. I love that!

I was unable to respond to any of the questions on this page!

I would like to see more new affordable nice energy saving homes built on the north side, east side Tulsa area

I would like to see the private property owner to have more involvement and input. We don't see this with HSN, any City of Tulsa grants/programs, etc. A group to advocate or lobby for the private owner needs a little publicity.

I'm concerned about how little I know about this topic as a Tulsa citizen.

I've wasted enough time on this....

Landlords can use the OK mental health laws to file false complaints which then strip a tenant of civil rights, both State and Federal, and access to HUD housing for years, because the TPD and DA will not do the work necessary to uncover the truth.

More fair housing advocacy, testing and enforcement is needed in the Tulsa area. Also advertising violations in fair housing have been overlooked, however, there are several pending

No further comment. thank you for your concern.

Only the one above

The Human Rights Department is essential to the well being of Tulsans and serves a valuable purpose. Any discussion of abolishing this Department is ludicrous.

This survey is bias because it does not allow lower economic citizens who do not have a computer the opportunity to respond.

To facilitate sufficient affordable housing in Tulsa, projects utilizing local financial project funding assistance should perhaps be required to commit a specific percentage of total housing units to affordable housing (5% for example).

While these laws were much needed when enacted, I don't see evidence that there is a strong continuing need. I see no outward signs of discrimination in housing in Tulsa.

APPENDIX F: ADDITIONAL INFORMATION

REFERENCED CITY ORDINANCES

Ch. 1, Pg. 1

Title 5 - Boards, Commissions and Committees

Supp. 19 (1/1/09)

TITLE 5

BOARDS, COMMISSIONS AND COMMITTEES

CHAPTER 1.	HUMAN RIGHTS COMMISSION
CHAPTER 2.	COMMISSION ON CONCERNS OF THE DISABLED
CHAPTER 3.	ARTS COMMISSION OF THE CITY OF TULSA
CHAPTER 4.	ECONOMIC DEVELOPMENT COMMISSION OF THE CITY OF TULSA
CHAPTER 5.	GREATER TULSA AREA INDIAN AFFAIRS COMMISSION
CHAPTER 6.	GREATER TULSA AREA HISPANIC AFFAIRS COMMISSION
CHAPTER 7.	MAYOR'S COMMISSION ON THE STATUS OF WOMEN
CHAPTER 8.	SIGN ADVISORY BOARD
CHAPTER 9.	TRANSPORTATION ADVISORY BOARD
CHAPTER 10.	TULSA YOUTH COUNCIL

CHAPTER 1

HUMAN RIGHTS COMMISSION

- Section 100. Declaration of Policy.
- Section 101. Definitions.
- Section 102. Human Rights Commission.
- Section 103. Mayor to Provide Staff to Assist the Commission and to Implement the Provisions of this Chapter.
- Section 104. Discrimination in Housing Prohibited.
- Section 105. Discrimination in Public Accommodations Prohibited.
- Section 106. Other Prohibited Acts.
- Section 107. Enforcement Procedures.
- Section 108. Notices.
- Section 109. Penalties.
- Section 110. Nondiscriminatory Employment Requirements for Persons Who Contract With the City.
- Section 111. Discrimination Against Qualified Persons with Disabilities Prohibited.
- Section 112. Municipal Offices, Personnel and Agencies to Assist.

SECTION 100. DECLARATION OF POLICY

A. It is the policy of the City of Tulsa that all persons shall have an equal opportunity commensurate with their economic capacity to purchase, rent, lease or occupy housing and that all persons shall have an equal opportunity to avail themselves

of public accommodations without regard to race, color, religion, sex, national origin, ancestry, marital status, familial status or disability;

B. It is the policy of the City of Tulsa that all persons shall have an equal opportunity for employment and to participate in the social and economic life of the City without regard to race, color, religion, sex, national origin, ancestry, age, disability, or medical condition due to pregnancy;

C. It is the policy of the City of Tulsa that all programs, services and activities of the City or any of its instrumentalities or agencies shall be accessible to individuals with disabilities as required by law; and

D. It is the policy of the City of Tulsa to encourage the utilization of minority business enterprises and female business enterprises by persons who contract with the City.

E. It is the policy of the City of Tulsa to encourage the employment of residents of the City and the Metropolitan Statistical Area ("MSA") in public improvement contracts.

Ord. No. 17807

SECTION 101. DEFINITIONS

Unless otherwise provided, for the purposes of this chapter, the following words and phrases shall have the meanings given herein.

- A. **City** shall mean the City of Tulsa, Oklahoma, a municipal corporation.
- B. **Commission** shall mean the Human Rights Commission of the City of Tulsa.
- C. **Compliance Official** shall mean the Mayor of the City of Tulsa or the person or persons designated by the Mayor to enforce the provisions of this chapter.
- D. **Council** shall mean the legislative body of the City of Tulsa.
- E. **Disability** shall refer to an individual who has a physical or mental impairment which substantially limits one or more of his major life activities, who has a record of having such an impairment, or who is regarded as having such an impairment. Disability shall not mean or include the current illegal use of a controlled substance as defined in Section 102 of the United States Controlled Substance Act, 21 U.S.C. § 812, transvestism, transsexualism, pedophilia, exhibitionism, voyeurism, gender identity disorders not resulting from physical impairment, other sexual behavior

disorders, compulsive gambling, kleptomania, pyromania, and psychoactive substance use disorders resulting from the illegal use of drugs.

F. **Discriminate or Discrimination** shall mean segregation or difference in treatment.

G. **Mayor** shall mean the Mayor of the City of Tulsa or his designated representative.

H. **Minority/female business enterprises (M/FBE)** shall mean minority business enterprises or female/women business enterprises as defined herein, who have been certified to do business with the City of Tulsa.

I. **Person** shall mean any individual, firm, company, association, partnership or group, their agents, servants or employees. As applied to partnerships or other associations, person shall include their members, officers and directors. As applied to corporations, person shall include their officers and directors. The term person shall also include a fiduciary, whether or not appointed by the court, and shall include owner.
Ord. No. 17807

SECTION 102. HUMAN RIGHTS COMMISSION

A. **Membership, Terms.** The Human Rights Commission of the City of Tulsa shall consist of no more than fifteen (15) nor fewer than twelve (12) members appointed by the Mayor, subject to the approval of the Council. Terms of office for the members of the Commission shall be as follows: one-third (1/3) of the terms shall end on July 1, 1992; one-third (1/3) shall end on July 1, 1993; and one-third (1/3) shall end on July 1, 1994. Thereafter, all appointments to the Commission shall be for terms of three (3) years from the date of the expiration of the previous term. All members shall hold office until their successors are appointed and qualified. All members shall serve without compensation.

B. **Meetings, Quorum, Voting.** All meetings of the Commission shall be open to the public as provided by the laws of Oklahoma. Six (6) members of the Commission shall constitute a quorum. All decisions of the Commission shall require a majority vote of those present and shall be made only at meetings at which at least a quorum of its members is in attendance.

C. **Powers, Duties, Responsibilities.** The Commission shall:

1. Promulgate rules and regulations governing the conduct of its meetings;
2. Conduct such activities or hearings necessary to implement the provisions of this chapter;

3. Plan annually to set priorities and objectives for accomplishing the policies stated herein;
4. Develop an annual budget;
5. Plan and conduct meetings, surveys, educational and other programs concerning human and civil rights;
6. Utilize the resources of individuals and groups within the community to improve intergroup relations;
7. Identify and enlist community resources to secure and extend democratic rights, opportunities and practices and to encourage community support for human and civil rights programs;
8. Issue such publications and reports which will tend to promote good will and reduce discrimination;
9. Cooperate with local, state and federal agencies to effect equal opportunity in the social and economic life of the community; and
10. Report to the Mayor and Council annually on the disposition of all complaints referred to the Commission and on other matters appropriate to be brought before the Council, including recommendations necessary or desirable to carry out the purposes of this chapter.
Ord No. 17807

**SECTION 103. MAYOR TO PROVIDE STAFF TO ASSIST THE
COMMISSION AND TO IMPLEMENT THE PROVISIONS
OF THIS CHAPTER**

- A. The Mayor shall designate such City employees as may be necessary to assist the Commission and to accomplish the duties set forth in this chapter or hereafter assigned. The persons so designated shall:
1. Conduct compliance reviews to determine whether or not persons who contract with the City are complying with the terms of Section 110 herein;
 2. Conduct such other compliance reviews as are required for the acceptance of grants from the state or federal governments; and
 3. Receive or initiate and investigate complaints of discrimination and other acts and practices prohibited by this chapter, enter into conciliation agreements when

appropriate, and refer complaints to the Manager of the Criminal Division of the Legal Department when appropriate.

B. The compliance official shall have the right, power, and authority, subject to the approval of the Commission, the Mayor and the Council, to promulgate rules and regulations necessary for the implementation and administration of this chapter. A copy of such rules and regulations, if promulgated and approved, shall be on file in the Office of the City Clerk.

C. In conducting investigations pursuant to the provisions of this chapter, the compliance official shall have access at all reasonable times to premises, records, documents and other possible sources of evidence. The compliance official may examine and copy records and may take testimony or statements from such persons as may be reasonably necessary in conducting such investigations.

D. The Mayor may direct, from time to time, such other activities as may be necessary to implement the provisions of this chapter.

Ord. No. 17807

SECTION 104. DISCRIMINATION IN HOUSING PROHIBITED

A. **Definitions.** For the purposes of this section, the following words and phrases shall have the meanings given herein.

1. **Familial status** shall refer to one or more individuals who have not attained the age of eighteen (18) years who are domiciled with (a) a parent or other person having legal custody of such individual or individuals, or (b) the designee of a parent or other person having legal custody with the written permission of such parent or person having legal custody.

2. **Housing unit** shall mean any single-family or multifamily dwelling located in the City of Tulsa, including a mobile home trailer, which is designed to be used and is used or occupied as the home, homesite, residence or sleeping place of one or more human beings.

3. **Lending institution** shall mean any bank, mortgage company, insurance company, savings and loan association, credit union, or any other person or organization regularly engaged in the business of lending money or guaranteeing loans.

4. **Owner** shall mean owner, lessee, sublessee, assignee, agent or any other person having the right of ownership or possession or the right to sell, rent or lease any real property.

5. **Real property** shall mean any parcel or parcels of land, whether or not contiguous, owned or otherwise subject to the control of one or more persons, containing or available for the building of one or more housing units.

B. **Prohibited Acts.** The following acts shall be unlawful and an offense:

1. For any person to discriminate in publishing, circulating, displaying, issuing or posting any written or printed communication or advertisement, lease or sublease, assignment, transfer or listing of real property which indicates any preference, limitation, specification or discrimination based on race, color, religion, disability, national origin, ancestry, sex, marital status, or familial status;

2. For any person to induce or solicit or attempt to induce or solicit any real property listings, sale or transaction by representing that the presence or anticipated presence of persons of any race, color, religion, disability, national origin, ancestry, sex, marital status or familial status in the block, neighborhood or area in which the property is located will or may have results such as the following:

- a. Lowering property values,
- b. A change in the racial, religious or ethnic composition of the block, neighborhood or area,
- c. Increase in criminal or anti-social behavior in the area, or
- d. Decline in the quality of schools in the area;

3. For any person to fail or refuse to sell, rent, lease, sublease, assign or offer for inspection any real property because a person associates with persons of a particular race, color, religion, disability, national origin, ancestry, sex, marital status or familial status;

4. For any lending institution to discriminate against any person because of race, color, religion, disability, national origin, ancestry, sex or marital status in lending, appraising, guaranteeing loans, accepting mortgages or otherwise making available funds for the purchase, acquisition, construction, rehabilitation, repair or maintenance of any real property; or

5. For any lending institution to fail or refuse to lend, guarantee loans, accept mortgages or otherwise make available funds for the purchase, acquisition, construction, rehabilitation, repair or maintenance of any real or personal property in an area because the area is composed of members of a particular race, color, religion, disability, national origin, ancestry, sex, marital status, or to give less favorable loan terms for the purchase, acquisition, construction, rehabilitation, repair, or maintenance of real or personal

property in an area if such practices have a discriminatory effect against a particular class, the members of which consist of persons of a particular race, color, religion, disability, national origin, ancestry, sex, or marital status.

C. Exempt Practices and Acts. Nothing in this section shall:

1. Apply to the rental of rooms or units in any owner-occupied house or dwelling used exclusively as a rooming house; or

2. Bar any religious institution or organization, or any charitable or educational organization which is operated, supervised or controlled by a religious organization from limiting admission to or giving preference in housing accommodations to persons of the same religion.

Ord. Nos. 17132, 17807

SECTION 105. DISCRIMINATION IN PUBLIC ACCOMMODATIONS PROHIBITED

A. Place of Public Accommodation Defined. For the purposes of this section, place of public accommodation shall mean any place, either licensed or unlicensed, which is open to or accepts or solicits the patronage of the general public, which supplies goods or services to the general public, and shall include but not be limited to the following types of services or facilities: hotels, inns or other establishments which provide lodging to transient guests; restaurants, cafeterias, lunchrooms, lunch counters, soda fountains or other facilities principally engaged in selling or offering for sale food for consumption on the premises; child care facilities; motion picture houses, theaters, concert halls, sports arenas, stadiums or other places of exhibition or entertainment; bowling alleys and amusement parks; retail establishments; lending institutions; learning institutions; transportation carriers, mobile home parks; barber shops; beauty shops, bars, clubs, taverns or other facilities engaged in selling or offering for sale alcoholic beverages for consumption upon the premises; and public burial facilities when such facilities are owned or operated by any cemetery corporation or burial association; except that a private club is not a place of public accommodation if its policies are determined by its members and its facilities or services are available only to its members and their bona fide guests.

B. Prohibited Acts.

1. It shall be unlawful and an offense for any owner, manager, proprietor, concessionaire, custodian, lessee, agent, employee or association of a place of public accommodation, because of a person's race, color, religion, ancestry, national origin, sex, age or disability:

- a. To deny or refuse any privilege, facility, goods, services, merchandise, commodity or accommodation; or
- b. To segregate or require the placing of any person in any separate section or area of the premises or facility of a place of public accommodation.

2. It shall be unlawful and an offense for any person to print, circulate, post, maintain or display or cause to be printed, circulated, posted, maintained or displayed any advertisement, notice, or sign to the effect that any of the accommodations, facilities, privileges, goods, services, or merchandise of a place of public accommodation will be withheld from or refused or denied to any person based on race, color, religion, national origin, ancestry, disability, sex, or age.

C. **Exemptions.** Nothing in this section shall be construed to:

1. Grant any person a right to enter upon the premises of a place of public accommodation for any purpose other than the express and obvious purpose or purposes for which the place of public accommodation typically provides to the general public;
2. Grant any person a right to enter upon the premises of a place of public accommodations except during its normal hours of operation;
3. Grant a right to enter upon the premises of a place of public accommodation to any person who is intoxicated, disorderly, vagrant, loitering, begging, disturbing the peace, soliciting, selling, advertising, vending goods or presenting himself in any manner, state, dress, demeanor or condition for which the general public, regardless of race, color, religion, disability, national origin, ancestry, sex, or age, would be excluded; or
4. Grant a right to enter upon the premises of a place of public accommodation to any person who is excluded by law because such person is under the legal age.
5. Prevent any place of public accommodation from maintaining separate restrooms or dressing rooms for men and women.

Ord. No. 17807

SECTION 106. OTHER PROHIBITED ACTS

It shall be unlawful and an offense for any person:

A. To retaliate or discriminate in any manner against a person because he has opposed a practice declared an offense by this chapter or because he has filed a complaint, made a charge, testified, assisted or participated in any investigation, proceeding or hearing authorized by this chapter;

B. To aid, abet, incite, compel or coerce or attempt to aid, abet, incite, compel or coerce a person to engage in any of the acts or practices declared an offense by this chapter.

C. To obstruct or prevent or attempt to obstruct or prevent a person from complying with the provisions of this chapter or any conciliation agreement issued under the provisions of this chapter;

D. To resist, prevent, impede or interfere with the Commission or any of its members, the compliance official or any City employee in the lawful performance of his or her duties under this chapter;

E. As a party to any conciliation agreement made pursuant to the provisions of this chapter, to violate the terms of such agreement; or

F. To conspire with any other person or persons to perform any of the acts declared unlawful by this section.

SECTION 107. ENFORCEMENT PROCEDURES

A. **Complaint.** Any person claiming to be aggrieved by any act declared unlawful and an offense by Sections 104, 105, and 106 (hereinafter "complainant") or the compliance official may file a verified complaint, setting forth the particulars of the alleged offense and such other information as may be required by the compliance official. Such complaints must be filed with the City Clerk and the compliance official within one hundred eighty (180) days after the alleged offense has been committed.

B. **Notice and Answer.** The person against whom a complaint has been filed (hereinafter "respondent") shall be notified and served with a copy of the complaint. Such notice shall advise that the respondent may file a verified answer to the complaint with the compliance official within ten (10) days of receiving such notification.

C. **Investigation and Resolution.** Within sixty (60) days after the filing of any complaint, the compliance official shall make an investigation of the complaint.

1. If, after investigation, the compliance official determines that an offense has not been committed, the compliance official shall issue an order setting forth the findings of the investigation and dismissing the complaint. The order shall be sent to the complainant and respondent.

2. **Probable Cause, Notice, Conciliation.** If, after investigation, the compliance official determines that there is probable cause to believe that an offense has occurred, the compliance official shall notify both the complainant and respondent, and shall attempt to negotiate a conciliation agreement between the parties.

3. **Conciliation Agreement.** The terms of any conciliation agreement shall require the respondent to refrain from committing the unlawful discriminatory act in the future and may include damages to the complainant and such other provisions as may be agreed upon by the complainant, the respondent, and compliance official. A conciliation agreement must be in writing, signed by the complainant, respondent and compliance official.

4. **Referral of Complaints to State or Federal Agencies or to Manager of Criminal Division of the Legal Department.** If the compliance official determines that a conciliation agreement cannot be reached, he may refer the findings of the investigation to appropriate state or federal agencies or he may transmit his findings to the Manager of the Criminal Division of the Legal Department.

Ord. No. 17807

SECTION 108. NOTICES

Unless otherwise specifically provided herein, all notices required by the provisions of this chapter shall be served by mailing each notice to the addressee's last known address, by United States mail, certified, return receipt requested.

Ord. No. 17807

SECTION 109. PENALTIES

Unless otherwise provided herein, any person violating any of the provisions of Sections 104, 105, and 106 herein shall be guilty of an offense and, upon conviction thereof, shall be punished by a fine of not more than FIVE HUNDRED DOLLARS (\$500.00) excluding costs, and each day such a violation occurs shall be deemed a separate offense.

Ord. No. 17807

SECTION 110. NONDISCRIMINATORY EMPLOYMENT REQUIREMENTS FOR PERSONS WHO CONTRACT WITH THE CITY

A. **Definitions.** For the purposes of this section, the following words and phrases shall have the meanings given herein.

1. **Affirmative action** shall mean a positive, continuing results-oriented program designed to insure a good faith effort to employ applicants and treat employees

equally, without regard to race, color, religion, national origin, ancestry, sex, disability or age. Such program shall include but not be limited to recruiting, employment, upgrading, promotion, training, apprenticeship, rates of pay or other forms of compensation, demotion, transfer, layoff or termination. Such program also shall include a work force analysis, utilization analysis, and appropriate goals and timetables declaring a method of implementing a good faith effort to correct any existing deficiencies and to eliminate any existing employment barriers.

2. **Age** shall mean the age of individuals who are over forty (40) years of age.
3. **Contractor** shall mean any person, including a depository, who bids or supplies labor, materials, goods or services, including professional services, to the City of Tulsa or any subcontractor of a contractor.
4. **Disability** shall mean an individual who has a physical or mental impairment which substantially limits one or more of his major life activities, who has a record of such an impairment, or who is regarded as having such an impairment. Disability shall not mean or include the current illegal use of a controlled substance as defined in Section 102 of the United States Controlled Substance Act, 21 U.S.C. § 812, transvestism, transsexualism, pedophilia, exhibitionism, voyeurism, gender identity disorders not resulting from physical impairment, other sexual behavior disorders, compulsive gambling, kleptomania, pyromania, and psychoactive substance use disorders resulting from the illegal use of drugs.
5. **Female/women business enterprise (FBE)** means a small business concern, defined pursuant to Section 3 of the Small Business Act and implementing regulations, which is owned and controlled by one or more women.
6. **Minority business enterprise (MBE)** means those individuals engaged in an enterprise who are citizens of the United States (or lawfully admitted permanent residents) and who are Black Americans, Hispanic Americans, Native Americans, Asian-Pacific Americans or Asian-Indian Americans or any other minorities or individuals found to be disadvantaged by the Small Business Administration pursuant to Section 8(a) of the Small Business Act, as amended, 15 U.S.C. § 637(a).
7. **Person** shall mean an individual, partnership, association, corporation, legal representative, or a combination thereof and any labor organization furnishing or referring employee applicants to any employer or contractor doing business with the City of Tulsa.
8. **Subcontractor** shall mean any person who undertakes, by a separate agreement with a contractor, to fulfill all or a part of the latter's contractual obligation with the City of Tulsa.

9. **Unlawful employment practice** shall mean, because of race, religion, color, national origin, ancestry, sex, age, disability or medical condition due to pregnancy:

- a. To fail or refuse to hire, discharge or otherwise to discriminate against any individual with respect to compensation, terms conditions or privileges of employment;
- b. To fail or refuse to admit or employ any individual in an organization, apprenticeship, joint labor management or other training or retraining program;
- c. To limit, segregate or classify employees or applicants for employment in a way which deprives the individual of employment opportunities; or
- d. To retaliate or discriminate against an individual because the individual has made a charge, testified, assisted or participated in an investigation, proceeding or hearing pursuant to this section;

provided, however, it shall not be an unlawful employment practice to do any of the foregoing if the act is based upon a bona fide occupational qualification, reasonably necessary to the normal operation of the particular business or enterprise, or, in the event of disability, if a reasonable accommodation cannot be accomplished without undue hardship. "Reasonable accommodation" and "undue hardship" shall have the meanings given in Title 5, Section 111, Tulsa Revised Ordinances.

B. Requirements of City Contractors.

1. No contractor shall engage in any unlawful employment practices.
2. No bid proposals shall be considered, no purchase order issued, no contract awarded nor payment made by the City of Tulsa unless the contractor agrees:
 - a. That he shall not engage in any unlawful employment practice;
 - b. That he shall practice affirmative action as herein defined;
 - c. That he shall post notices of nondiscrimination in conspicuous places open to employees and applicants, such notices to be obtained from the compliance official;
 - d. That he shall state, in solicitations or advertisements for employees, that applicants will receive consideration for employment without regard to race, color, religion, national origin, ancestry, sex, age, or disability;

- e. That he shall obtain from any labor union or organization furnishing labor or services to the contractor a written statement that the union or organization will not engage in an unlawful employment practice;
- f. That he shall cooperate with the City of Tulsa and the compliance official in any investigation, compliance review or conciliation effort made to insure (i) that no unlawful employment practice occurs, (ii) that affirmative action does occur, and (iii) that minority/female business enterprises (M/FBE) and other disadvantaged businesses are utilized;
- g. That he shall require any subcontractor to comply with this section;
- h. That he shall refrain from knowingly contracting with any person declared by the City of Tulsa to be ineligible to do business with it;
- i. That he shall utilize minority business enterprises (MBE), female business enterprises (FBE) and other disadvantaged businesses;
- j. That he shall indemnify the City for any liability incurred by the City as a result of the contractor's discriminatory acts;
- k. That in the performance of any contract with the City of Tulsa, he shall be in compliance with the Americans with Disabilities Act, 42 U.S.C. § 12101, *et seq.*; and
- l. That he shall comply with the terms of any conciliation agreement made with the compliance official of the City of Tulsa.

3. A contractor shall furnish, within ten (10) working days, information required by the compliance official to determine compliance with this section, and shall permit reasonable access by the compliance official to contractor's facilities, employees and to books, papers, records, reports or accounts in the possession or under control of the contractor which are necessary to determine compliance.

C. Jurisdiction and Powers of the Compliance Official and Human Rights Commission.

1. The compliance official shall receive, review, investigate and, whenever possible, conciliate complaints of any unlawful employment practice or any other violation of this section.

2. The compliance official shall receive, review and approve or reject affirmative action programs submitted by any person seeking or a party to any contract with the City of Tulsa.

3. The compliance official shall have the power to initiate and conduct investigations and compliance reviews of contractors and potential contractors. The compliance official and Commission shall have the power to take such action with respect thereto as will, in their judgment, ensure compliance with the provisions of this section and with its rules and regulations.

D. Complaint and Conciliation Procedure.

1. Any person claiming to be aggrieved by an unlawful employment practice or other violation of this section (hereinafter "complainant") shall, within one hundred-eighty (180) days of the alleged act of discrimination, file with the compliance official a verified complaint setting forth the particulars of the alleged act of discrimination or other violation of this section and containing such other information as may be required by the compliance official. The compliance official may also initiate a complaint alleging a violation of this section.

2. Within sixty (60) days after the filing of such complaint, the compliance official shall initiate or cause to be initiated an investigation of the complaint.

3. If, after investigation the compliance official determines that an offense has not been committed, the compliance official shall issue an order setting forth the findings of the investigation, dismissing the complaint and so notifying the complainant and the respondent.

4. If, after investigation, the compliance official determines that there is probable cause to believe that there has been a violation of this section, the compliance official shall immediately endeavor to eliminate or correct the practice or the violation by conciliation.

E. Public Hearings.

1. In the event a conciliation attempt fails to correct or eliminate the complained of practice or violation, or if a conciliation agreement is violated, the Commission shall, upon reasonable notice to the parties, hold a public hearing. A hearing panel, comprised of no fewer than three (3) members of the Commission, may be appointed to conduct the hearing.

2. If a hearing panel is appointed and, after hearing, determines that there has been a violation of this section, it shall make written findings of fact and conclusions of law and shall forward them, together with its recommendations, to the parties involved and to the Commission.

3. If the Commission determines that there has been a violation of this section, it shall make written findings of fact and conclusions of law and forward them, together with its recommendations, to the parties and to the Mayor.

F. Cancellation, Termination, Suspension, Ineligibility and Appeal.

1. Upon receiving recommendations from the Commission, the Mayor may cancel, terminate or suspend all or a part of a contract and/or may declare the contractor ineligible for further business with the City of Tulsa for a period not to exceed one (1) year.

2. After the expiration of the period of ineligibility, a contractor may be reinstated upon written application to the Commission and completion of a compliance review. The Commission may recommend approval or denial of reinstatement to the Mayor who may adopt or reject the Commission's recommendation.

G. Appeal. Within ten (10) days following the Mayor's action, any party adversely affected by the Mayor's action may appeal to the City Council by filing a notice of appeal in the office of the City Clerk and providing notice to the other party and the compliance official. The appeal shall be heard by the City Council at its next available meeting after the filing of the notice of appeal.

H. Council Action. The Council may uphold, reverse, or modify the action of the Mayor.

Ord. Nos. 16963, 16986, 17807

SECTION 111. DISCRIMINATION AGAINST QUALIFIED PERSONS WITH DISABILITIES PROHIBITED

A. Policy. It is the policy of the City of Tulsa to be in full compliance with the Americans with Disabilities Act (ADA), 42 U.S.C. § 12101, *et seq.*

B. Definitions. For the purposes of this section, the following words and phrases shall have the meanings given herein.

1. **Qualified individual with a disability** shall mean:

a. With respect to hiring practices: anyone who, with or without reasonable accommodation, can perform the essential functions of the job for which a person is applying; and

b. With respect to participation in or receiving benefits of the services, programs or activities of the City of Tulsa: an individual with a disability who, with or without reasonable modifications to rules, policies or

practices, the removal of architectural, communication or transportation barriers, or the provision of auxiliary aids and services, meets the essential eligibility requirements for the receipt of services or the participation in programs or activities provided by a City.

2. **Disability** shall mean a physical or mental impairment that substantially limits one or more of the major life activities of such individual, a record of such an impairment, or being regarded as having such an impairment.

3. **Major life activity** shall include but not be limited to functions, such as caring for one's self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, and working.

4. **Facility** shall mean all or any portion of buildings, structures, sites, complexes, equipment, rolling stock or other conveyances, roads, walks, passageways, parking lots, or other real or personal property, including the site where the building, property, structure or equipment is located.

5. **Discriminate, discrimination, or discriminatory act or practice** shall mean and include:

- a. Limiting, classifying or segregating an applicant in a manner which adversely impacts his opportunities because of a disability;
- b. Entering into a contract which subjects a qualified individual with a disability to prohibited discrimination, including but not limited to labor contracts, benefits contracts, and training and apprenticeship programs;
- c. Utilizing standards, criteria or methods of administration which have the effect of discriminating or perpetuate the discrimination of co-workers on the basis of a disability;
- d. Denying equal job and benefit opportunities to a qualified individual who is a friend or associate of a person with a disability;
- e. Not making a reasonable accommodation, unless it creates an undue hardship;
- f. Using any job description or employment test or qualification standard to screen out a qualified individual with a disability; or
- g. Failure to select and administer employment tests which reflect skills and abilities rather than reflecting a qualified individual's disability.

6. **Reasonable accommodation** shall include:
 - a. Making existing facilities accessible to and usable by individuals with disabilities; and
 - b. Restructuring of jobs, modifying work schedules, reassignment, acquisition or modification of equipment, modification or training and examinations, provisions of qualified readers and interpreters, or similar accommodations.
7. **Undue hardship** shall mean a significant difficulty or expense in light of the following factors:
 - a. The nature and cost of accommodation;
 - b. The financial resources of City; and
 - c. The type of operation or operations of the City.
8. **Physical or mental impairment** shall mean:
 - a. Any physiological disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more of the following body systems: neurological; musculoskeletal; special sense organs; respiratory, including speech organs; cardiovascular; reproductive; digestive; genito-urinary; hemic and lymphatic; skin; and endocrine; or
 - b. Any mental or psychological disorder, such as mental retardation, organic brain syndrome, emotional or mental illness, and specific learning disabilities. The term physical or mental impairment includes but is not limited to such diseases and conditions as orthopedic, visual, speech, and hearing impairment, cerebral palsy, epilepsy, muscular dystrophy, multiple sclerosis, cancer, heart disease, diabetes, mental retardation, emotional illness, and drug addiction and alcoholism.
9. **Qualified mediator** shall mean a recognized trained mediator independent of control by any officer or employee of the City of Tulsa.
10. **Employee** shall mean and include any individual employed by the City, whether full-time, part-time, temporary or pursuant to contract.
11. **Applicant for employment with the City of Tulsa** shall mean anyone seeking information about applying for employment or actually applying for employment with the City.

12. **Americans with Disabilities Act (ADA)** shall mean the provisions of 42 U.S.C. § 12101, *et seq.*, or as it may be amended.

13. **ADA Compliance Official** shall mean the Mayor of the City of Tulsa or the person or persons designated by the Mayor to enforce the provisions of the ADA or the provisions of this section.

14. **Respondent** shall be the director of the department or departments within the City of Tulsa against whom a complaint has been filed under the provisions of this section or his designated representative.

C. **Scope.** The provisions of this section shall apply to any qualified individual with a disability who is an applicant for employment with the City of Tulsa or who, with or without reasonable modifications to rules, policies or practices, the removal of architectural, communication or transportation barriers, or the provision of auxiliary aids and services, meets the essential eligibility requirements for the receipt of services or the participation in programs or activities provided by a City.

D. **Discriminatory Act or Practice Prohibited.**

1. **In Hiring Practices.** No officer or employee of the City of Tulsa shall discriminate against a qualified individual with a disability because of such disability in job application or hiring procedures.

2. **In City Services, programs, activities.** No qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs or activities of the City of Tulsa or be subjected to discrimination by the City or any of its boards, authorities, agencies or instrumentalities, officers or employees.

E. **Grievance Procedure.**

1. **Complaint.** Any person claiming to be aggrieved by a discriminatory act or practice prohibited or the provisions of this section (hereinafter "complainant") may within ten (10) days following the discriminatory act or practice file with the ADA compliance official a written complaint setting forth with particularity the complainant's disability, the alleged discriminatory act or practice, and such other information as the ADA compliance official may reasonably require.

2. **Answer.** Within five (5) days of receipt of any complaint alleging discrimination prohibited by this section, the ADA compliance official shall notify the respondent and shall attach a copy of the complaint with the notice. Within five (5) days after the receipt of the notice and complaint, the respondent shall file a written answer with the ADA compliance official.

3. **ADA Compliance Official's Recommendation.** Within seven (7) days after the receipt of the respondent's answer, the ADA compliance official shall issue a written recommendation to both the complainant and respondent. If, within five (5) days after the receipt of the ADA compliance official's recommendation, neither party requests mediation, the ADA compliance official's recommendation shall be deemed to be agreed upon by all parties and the matter settled. If the ADA compliance official's recommendation requires action by the respondent, such recommendation shall be implemented with due diligence and the respondent shall notify the ADA compliance official when the implementation is complete.

4. **Mediation.** If, within five (5) days of the receipt of the ADA compliance official's recommendation, either party feels aggrieved by the recommendation, that party may, by written notice to the ADA compliance official, request that the matter be referred to a qualified mediator. Within five (5) days of receipt of the request for mediation, the ADA compliance official shall request a conference with a qualified mediator. Notice of the date, time, and place of the mediation conference shall be provided to the complainant, respondent and ADA compliance official. If the parties to the mediation reach an agreement which requires action by the respondent, such recommendation shall be implemented with all diligence and the respondent shall notify the ADA compliance official when the implementation is complete.

5. **ADA Compliance Official's Post Mediation Recommendation.** If the parties to the mediation are unable to reach agreement, the ADA compliance official may either affirm, modify, or revise his recommendation and shall notify both parties in writing of his recommendation. If neither party appeals the ADA compliance official's post-mediation recommendation, the recommendation shall be deemed to have been agreed upon by all parties and the matter settled. If the ADA compliance official's recommendation requires action by the respondent, such recommendation shall be implemented with all diligence and the respondent shall notify the ADA compliance official when the implementation is complete.

6. **Appeal to the Council.** If either party feels aggrieved by the ADA compliance official's post-mediation recommendation, that party may, within five (5) days of receipt of such recommendation, appeal to the Council by filing a notice of appeal in the office of the City Clerk and providing written notice to the other party and to the ADA compliance official. The Council shall, within ten (10) days of the receipt of the notice of appeal, set the matter for hearing. The Council's decision shall be final.

7. **Notices.** All notices under this section shall be by U.S. mail, certified, return receipt requested.

Ord. No. 17807

SECTION 112. MUNICIPAL OFFICES, PERSONNEL AND AGENCIES TO ASSIST

The facilities, personnel, elected officials and agencies of the municipal government are directed to be available and to cooperate with the Department of Human Rights and Human Rights Commission to accomplish the objectives and purposes herein set forth.

Ord. No. 17807