

An aerial photograph of a wide river, likely the Mississippi River, during a dramatic sunset. The sky is filled with heavy, dark clouds, with a bright patch of light where the sun is setting, casting a golden glow across the water's surface. In the foreground, a tugboat is pushing a long red barge. Further upstream, another barge is visible. The river is flanked by dense green forests. On the left bank, there are some industrial structures, possibly a grain elevator. The overall mood is serene yet powerful due to the lighting and scale of the landscape.

# **STARKVILLE**

## **2019 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE**

**Sponsored by the Starkville Housing Authority**



# **2019 STARKVILLE**

## **ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE:**

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Starkville Housing Authority

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**Draft for Public Review  
April 19, 2019**

# Has Your Right to Fair Housing Been Violated?

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

## **The United States Department of Housing and Urban Development**

### **Address:**

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

**Telephone:** (202) 708-1112

**Toll Free:** (800) 669-9777

**Web Site:** <http://www.HUD.gov/>

## **The Mississippi Center for Justice**

### **Address (Jackson Office):**

5 Old River Place  
Suite 203 (39202)  
P.O. Box 1023  
Jackson, MS 39215-1023  
**Telephone:** (601) 352-2269  
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3 Division Street  
Biloxi, MS 39530-296  
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## ***SECTION I. EXECUTIVE SUMMARY***

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### **OVERVIEW**

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

1. The Fair Housing Act,
2. The Housing Amendments Act, and
3. The Americans with Disabilities Act.

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

### **ASSESSING FAIR HOUSING**

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

In 1994, HUD published a rule consolidating plans for housing and community development programs into a single planning process. This action grouped the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grants (ESG)<sup>153</sup>, and Housing Opportunities for Persons with AIDS (HOPWA) programs into the Consolidated Plan for Housing and Community Development, which then created a single application cycle. As a part of the consolidated planning process, and entitlement communities that receive such funds from HUD are required to submit to HUD certification that they are affirmatively furthering fair housing (AFFH). This was described in the Analysis of Impediments to Fair Housing Choice and a Fair Housing Planning Guide offering methods to conduct such a study was released in March of 1993.

In 2015, HUD released a new AFFH rule, which gave a format, a review process, and content requirements for the newly named "Assessment of Fair Housing", or AFH. The assessment would now include an evaluation of equity, the distribution of community assets, and access to opportunity within the community, particularly as it relates to concentrations of poverty among minority racial and ethnic populations. Areas of opportunity are physical places, areas within communities that provide things one needs to thrive, including quality employment, high performing schools, affordable housing, efficient public transportation, safe streets, essential services, adequate parks, and full-service grocery stores. Areas lacking opportunity, then, have the opposite of these attributes.

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<sup>153</sup> The Emergency Shelter Grants program was renamed the Emergency Solutions Grants program in 2011.

The AFH would also include measures of segregation and integration and provide some historical context about how such concentrations became part of the community's legacy. Together, these considerations were then intended to better inform public investment decisions that would lead to amelioration or elimination of such segregation, enhancing access to opportunity, promoting equity, and hence housing choice. Equitable development requires thinking about equity impacts at the front end, prior to the investment occurring. That thinking involves analysis of economic, demographic, and market data to evaluate current issues for citizens who may have previously been marginalized from the community planning process. All this would be completed by using an on-line Assessment Tool.

However, on January 5, 2018, HUD issued a notice that extended the deadline for submission of an AFH by local government consolidated plan program participants to their next AFH submission date that falls after October 31, 2020. Then, on May 18, 2018, HUD released three notices regarding the AFFH; one eliminated the January 5, 2018, guidance; a second withdrew the on-line Assessment Tool for local government program participants; and, the third noted that the AFFH certification remains in place. HUD went on to say that the AFFH databases and the AFFH Assessment Tool guide would remain available for the AI; and, encouraged jurisdictions to use them, if so desired.

Hence, the AI process involves a thorough examination of a variety of sources related to housing, the fair housing delivery system, housing transactions, locations of public housing authorities, areas having racial and ethnic concentrations of poverty and access to opportunity. The development of an AI also includes public input, and interviews with stakeholders, public meetings to collect input from citizens and interested parties, distribution of draft reports for citizen review, and formal presentations of findings and impediments, along with actions to overcome the identified fair housing issues/impediments.

In accordance with the applicable statutes and regulations governing the Consolidated Plan, Starkville Housing Authority certifies that they will affirmatively further fair housing, by taking appropriate actions to overcome the effects of any impediments identified in the Analysis of Impediments to Fair Housing Choice, and maintaining records that reflect the analysis and actions taken in this regard.

## **OVERVIEW OF FINDINGS**

As a result of detailed demographic, economic, and housing analysis, along with a range of activities designed to foster public involvement and feedback Starkville Housing Authority has identified a series of fair housing issues/impediments, and other contributing factors that contribute to the creation or persistence of those issues. This report contains data covering the entire service area of the Housing Authority, and does not reflect solely the fair housing issues within the Housing Authority itself.

Table I.1, on the following page, provides a list of the contributing factors that have been identified as causing these fair housing issues/impediments and prioritizes them according to the following criteria:

1. High: Factors that have a direct and substantial impact on fair housing choice
2. Medium: Factors that have a less direct impact on fair housing choice, or that Starkville Housing Authority has limited authority to mandate change.
3. Low: Factors that have a slight or largely indirect impact on fair housing choice, or that Starkville Housing Authority has limited capacity to address.



<b>Table I.1 Contributing Factors</b>		
<b>Contributing Factors</b>	<b>Priority</b>	<b>Justification</b>
Discriminatory patterns in lending	High	Minority households tend to have higher rates of mortgage denials than white households, as seen in 2008-2016 HMDA data.
Failure to make reasonable accommodation	High	HUD Fair Housing Complaint data suggests that failure to make reasonable accommodation was the most cited issue for complaints statewide.
Lack of access to housing for homeless and released from incarceration	Medium	Public input and the homeless and vulnerable population analysis revealed that homeless, persons recently released from incarceration, and transition-age foster youth have limited access to housing option throughout the State.
Lack of access to independence for persons with disabilities	High	Public input, the Disability and Access workgroup, and the Disability and Access Analysis revealed that households with disabilities have limited access to options that increase their independence.
Lack of opportunities for persons to obtain housing in higher opportunity areas	High	Access to higher opportunity areas is limited for many households due to income, transportation, and a variety of factors.
Moderate to high levels of segregation	High	The dissimilarity index shows a moderate to high level of segregation for minority households.
Lack of resources	High	Lack of resources continues to be a high rated contributing factor, as noted by Stakeholder Consultation meetings and public input.
Insufficient affordable housing in a range of unit sizes	High	The prevalence of cost burden, especially for lower income households, demonstrates the continued need for affordable housing options in a range of unit sizes.
Insufficient accessible affordable housing	High	The Disability and Access workgroup and Disability and Access analysis, coupled with a high disability rate particularly for the elderly population, demonstrated a lack of accessible affordable housing to meet current and future demand.
Lack of fair housing structure	High	Fair housing survey results and public input indicated a lack of fair housing structure.
Insufficient fair housing education	High	Fair housing survey results and public input indicated a continued need for fair housing education.
Insufficient understanding of credit	High	Fair housing survey results and public input indicated an insufficient understanding of credit.

## ADDITIONAL FINDINGS

In addition to the table above, there are several significant findings or conclusions summarized here. Black and Hispanic households have a moderate level of segregation. Other racial groups also have a moderate to high level of segregation, but these households represent a small proportion of the population. There are no R/ECAPs in Starkville currently. There is little disparity in access to opportunity by race and ethnicity.

## FAIR HOUSING ISSUES, CONTRIBUTING FACTORS, AND PROPOSED ACHIEVEMENTS

The Table I.2, on the following page, summarizes the fair housing issues/impediments and contributing factors. It includes metrics and milestones and a timeframe for achievements.

<b>Table I.2</b> <b>Fair Housing Issues, Contributing Factors, and Recommended Actions</b>			
<b>Fair Housing Issues/ Impediments</b>	<b>Contributing Factors</b>	<b>Recommended Actions to be Taken</b>	<b>Responsible Agency</b>
Segregation	Moderate to high levels of segregation	Review location of public housing stock and relocate to low poverty areas each year	Starkville Housing Authority
Disparities in Access to Opportunity	Discriminatory patterns in lending  Discriminatory terms/conditions  Lack of access to housing for homeless and released from incarceration  Lack of access to independence for persons with disabilities  Lack of opportunities for persons to obtain housing in higher opportunity areas	Consult with local transportation agencies to increase access to transit options for persons in high poverty areas, annually  Consult with local school district about increased access to proficient schools for public housing residents annually  Coordinate local efforts to increase access for homeless households to publicly supported housing annually  Continue to receive referrals annually to house homeless families and provide case management for these families to remain housed  Conduct mobility workshops with various partnering agencies for annually. Keep record of workshops  Enhance and continue resident services programs for all residents, including specialized programs for youth annually.  Provide computer classes/labs, afterschool programs for youth, financial literacy, nutrition workshops, and enrichment activities annually	Starkville Housing Authority
Disproportionate Housing Needs	Insufficient affordable housing in a range of unit sizes  Discriminatory patterns in lending  Lack of Resources	Continue the use of Housing Choice vouchers and encourage the development of 10 units of affordable housing sites outside high poverty areas each year  Review location of public housing stock and relocate to low poverty areas each year	Starkville Housing Authority

Publicly Supported Housing	<p>Insufficient affordable housing in a range of unit sizes</p> <p>Insufficient accessible affordable housing</p> <p>Lack of Resources</p>	<p>Increase the availability of public housing units outside high poverty areas, add 100 publicly supported housing units over the course of five (5) years</p> <p>Research and seek out additional funding opportunities for public housing options annually</p>	Starkville Housing Authority
Disability and Access	<p>Insufficient accessible affordable housing</p>	<p>Increase the availability of public housing accessible units through the encouragement of accessible units in all new and renovated housing developments, add 10 new accessible units over the course of five (5) years</p>	Starkville Housing Authority
Fair Housing Enforcement and Outreach	<p>Lack of fair housing structure</p> <p>Insufficient fair housing education</p> <p>Insufficient understanding of credit</p>	<p>Promote fair housing education through annual or biannual workshops</p> <p>Promote outreach and education related to financial literacy for public housing residents</p> <p>Conduct financial literacy for senior high school students on an annual basis</p>	Starkville Housing Authority

## **SECTION II. COMMUNITY PARTICIPATION PROCESS**

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The following section describes the community participation process undertaken for the 2019 Starkville Analysis of Impediments to Fair Housing Choice.

### **A. OVERVIEW**

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The outreach process included the 2018 Fair Housing Survey, Fair Housing Forums, Disability and Access Workgroups, and a public review meeting.

The Fair Housing Survey was distributed as an internet outreach survey, as well as being made available as a printed version. As of today, 52 responses have been received.

A series of public input meetings were held across the State for each participating jurisdiction. A set of transcripts from Starkville's meeting are included in the Appendix.

The Draft for Public Review AI was made available on April 22, 2019 and a 45-day public input period was initiated.

A public hearing was held during the public review period in order to gather feedback and input on the draft Analysis of Impediment. After the close of the public review period and inspection of comments received, the final report was made available to the public at the end of June, 2019.

### **B. FAIR HOUSING SURVEY**

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The purpose of the survey, a relatively qualitative component of the AI, was to gather insight into knowledge, experiences, opinions, and feelings of stakeholders and interested citizens regarding fair housing as well as to gauge the ability of informed and interested parties to understand and affirmatively further fair housing. Many individuals and organizations were invited to participate. At the date of this document, some 52 responses were received. A complete set of survey responses can be found in **Section IV.I Fair Housing Survey Results**.

### **C. FAIR HOUSING FORUMS**

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A series of public input meetings were held across the State for each participating jurisdiction. A set of transcripts from Starkville's meeting are included in the Appendix. Starkville held its Fair Housing Forum on December 12 in Columbus, in coordination with Columbus Housing Authority, Amory Housing Authority, Aberdeen Housing Authority, West Point Housing Authority, and Mississippi Regional Housing Authority IV.

### **D. DISABILITY AND ACCESS WORKGROUPS**

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A series of four (4) Disability and Access Workgroups were held between October and December, 2018 to gather feedback on the needs of persons with disabilities and access to

housing throughout the State of Mississippi. A summary of comments are included below, and a complete set of transcripts is included in the Appendix.

- Persons with disabilities tend to congregated in urban areas in order to access public transit
- There is a lack of available accessible units, and a lack of new development of accessible units
- There is continued need for permanent supportive housing for persons with disabilities
- NIMBYism continues to be a challenge for new units, especially group homes
- There should be a mandate that all new housing development includes a percentage of accessible units
- Significant need for transportation for persons with disabilities
- There is a need for integrated services beyond just housing

## E. STAKEHOLDER MEETINGS

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A series of six (6) stakeholder meetings were held throughout the AI development process. Stakeholder Consultation meetings included the various participating jurisdictions across the state, providing an opportunity to give input and feedback and allow stakeholders to participate in the AI development process. In addition, a series of eight (8) progress review meetings were held to overview the AI development process and increase coordination among acting agencies.

## F. PUBLIC REVIEW PERIOD

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The Draft for Public Review AI was made available on April 22, 2019 and a 45-day public input period was initiated.

A public hearing was held during the public review period in order to gather feedback and input on the draft Analysis of Impediment. After the close of the public review period and inspection of comments received, the final report was made available to the public at the end of June, 2019.

## SECTION III. ASSESSMENT OF PAST GOALS AND ACTIONS

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An Analysis of Impediments to Fair Housing Choice for the State of Mississippi was last completed in 2015. The conclusions drawn from this report are outlined in the following narrative.

### A. PAST IMPEDIMENTS AND ACTIONS

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*The conclusions of the 2015-2018 Analysis of Impediments are included below:*

#### IMPEDIMENTS TO FAIR HOUSING CHOICE AND SUGGESTED ACTIONS

##### Private Sector Impediments, Suggested Actions, and Measurable Objectives

**Impediment 1: More frequent denial of home purchase loans to black, Hispanic, and female applicants:** The perception that black, Hispanic, and female applicants found it more difficult to secure a home loan was cited by a number of survey respondents. This impression was shared by participants in fair housing forum discussion, and the perception was borne out in an analysis of home loan denials in non-entitlement areas of the state. Just over 30 percent of loan applications were denied to all applicants, but when those applicants were black the denial rate climbed to 45.2 percent. Hispanic applicants were denied 34.6 percent of the time, compared to a 28.4 percent denial rate for non-Hispanic applicants. Likewise, 36.1 percent of home loan applications from female applicants were denied, while 26.6 of applications from male applicants were denied.

*Action 1.1: Educate buyers through credit counseling and home purchase training*

*Measurable Objective 1.1: Number of outreach and education activities conducted*

**Impediment 2: Predatory style lending falls more heavily on black borrowers:** This impediment was identified in review of home loan data collected under the Home Mortgage Disclosure Act and in results of the 2014 Fair Housing Survey. Predatory style lending refers to loans with high annual percentage rates (HALs).<sup>154</sup> While 24.7 percent of those who took out a home loan were issued a loan that was predatory in nature, the percentages of HALs to black and Hispanic borrowers were 38.7 and 27.3 percent, respectively.

*Action 2.1: Educate buyers through credit counseling and home purchase training*

*Measurable Objective 2.1: Increase number of outreach and education activities conducted*

**Impediment 3: Discriminatory terms and conditions and refusal to rent:** This impediment was identified through review of the results of the fair housing survey, the fair housing forum discussion in Hattiesburg, and fair housing studies profiled in the literature review. Perception of discriminatory refusal to rent was relatively common among survey respondents, who cited race as the basis for this perceived discrimination. In addition, discrimination was identified as

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<sup>154</sup> See **Section V** for a more complete discussion of HALs.

more common in the rental industry during the fair housing forum in Hattiesburg, and national fair housing studies focus on the persistence of discrimination in the rental housing industry.

*Action 3.1:* Enhance testing and enforcement activities and document the outcomes of enforcement actions

*Measurable Objective 3.1:* Increase number of testing and enforcement activities conducted

*Action 3.2:* Continue to educate landlords and property management companies about fair housing law

*Measurable Objective 3.2:* Increase number of outreach and education activities conducted

*Action 3.3:* Continue to educate housing consumers in fair housing rights

*Measurable Objective 3.3:* Increase number of outreach and education activities conducted

**Impediment 4: Failure to make reasonable accommodation or modification:** Discrimination on the basis of disability was one of the most common complaints that HUD received from Mississippi from 2004 through the beginning of 2014, and the refusal on the part of housing providers to make a reasonable accommodation for residents with disabilities was a relatively common accusation. Fair housing forum discussions turned at points to the difficulties that persons with disabilities face in convincing landlords to allow reasonable modifications or in finding accessible apartments, as well as to the difficulties that those in construction and property management face in interpreting accessibility requirements. These concerns were also reflected in commentary submitted with the fair housing survey. Finally, two of the six DOJ complaints filed against Mississippi housing providers in the last five years alleged discrimination on the basis of disability.

*Action 4.1:* Enhance testing and enforcement activities and document the outcomes of enforcement actions

*Measurable Objective 4.1:* Increase number of testing and enforcement activities conducted

*Action 4.2:* Educate housing providers about requirements for reasonable accommodation or modification

*Measurable Objective 4.2:* Increase number of training sessions conducted

*Action 4.3:* Conduct audit testing on newly constructed residential units

*Measurable Objective 4.3:* Number of audit tests completed

## Public Sector Impediments, Suggested Actions, and Measurable Objectives

**Impediment 1: Insufficient understanding of fair housing laws:** This impediment was identified through a review of the fair housing survey and the minutes taken at the four fair housing forums. Survey respondents and forum participants alike continually cited a need for more education of fair housing law and policies, as well as the types of actions that could constitute unlawful violations of the Fair Housing Act. In addition, results from the fair housing survey indicate some confusion among respondents on several matters relating to fair housing policy, including the extent of protections offered under the Fair Housing Act. Finally, nearly a quarter of fair housing survey respondents who reported their level of awareness of fair housing laws professed to know “very little” about such laws.



*Action 1.1:* Conduct outreach and education to the public for several perspectives related to fair housing

*Measurable Objective 1.1:* The number of outreach and education actions taken in regard to the value of having housing available to all income groups in the state, thereby encouraging neighborhoods to be more willing to accept assisted housing facilities

*Measurable Objective 1.2:* Participate in sponsorship or co-sponsorship of public meetings during April, Fair Housing Month

*Measurable Objective 1.3:* Request on a periodic basis fair housing complaint data from the Mississippi Center for Justice and HUD and publish this information to teach others about fair housing

***Impediment 2: Insufficient fair housing testing and enforcement in non-entitlement areas of Mississippi:*** This impediment was identified in the results of the 2014 Fair Housing Survey. Of those who answered the survey question concerning awareness of fair housing testing, only about a fifth were aware of any such testing. Furthermore, a majority of respondents who registered their opinion on current levels of fair housing testing thought that they were insufficient.

*Action 2.1:* Initiate an inventory of Fair Housing Initiative Program (FHIP) grantees or prospective grantees in Mississippi

*Measurable Objective 2.1:* Compile the inventory

*Measurable Objective 2.2:* Conduct outreach and exploratory discussions with FHIP entities who might be able to perform testing and enforcement activities in the State

*Action 2.2:* Number of contacts made with FHIP entities

***Impediment 3: Fair Housing Infrastructure largely lacking:*** This impediment was identified through review of the fair housing structure as well as the minutes from the Hattiesburg Fair Housing Forum. There is no state level agency that is charged with enforcing fair housing law in the state, just as there is no fair housing statute at the state level. The lack of such an agency, and the difficulties this presents for affirmatively furthering fair housing, were a dominant theme in the Hattiesburg Fair Housing Forum.

*Action 3.1:* Initiate an inventory of Fair Housing Initiative Program (FHIP) grantees or prospective grantees in Mississippi

*Measurable Objective 3.1:* Compile the inventory

*Measurable Objective 3.2:* Conduct outreach and exploratory discussions with FHIP entities who might be able to work in Mississippi

*Action 3.2:* Number of contacts made with FHIP entities

***Impediment 4: Lack of understanding of the fair housing duties:*** Just as housing consumers are often unaware and uninformed of their rights under the Fair Housing Act, housing providers can be unaware of their responsibilities under the Act. This lack of awareness often manifests itself as an unwillingness to make reasonable accommodations for residents with disabilities, though it can appear in other actions and omissions on the part of housing providers. The

presence of this impediment was identified through review of the minutes of the fair housing forum and the results of the fair housing survey.

*Action 4.1:* Promote the Analysis of Impediments and Fair Housing Action Plans during Fair Housing Month in April

*Measurable Objective 4.1:* Actions taken to promote fair housing month and the Analysis of Impediments to Fair Housing Choice

*Action 4.2:* Hold quarterly meetings to promote public understanding of fair housing, affirmatively furthering fair housing, and key issues in lending

*Measurable Objective 4.1:* Number of meetings held

**Impediment 5: Overconcentration of vouchers, assisted housing, and lower-income housing in selected areas of the State.** Geographic maps prepared that show the geographic dispersion of such housing is concentrated in selected non-entitlement areas of the State. Further analysis demonstrates that there is some correlation between locations of such housing and concentrations of poverty.

*Action 5.1:* Add additional criteria to assisted housing location and other investment decisions

*Measurable Objective 5.1:* Determine the additional criteria, such as concentration of poverty or concentration of racial or ethnic minority, and incorporate this in the decision process

*Measurable Objective 5.2:* Evaluate the implications of redevelopment and other investments in areas with high rates of poverty and/or higher concentrations of racial and ethnic minorities

*Action 5.2:* Facilitate the creation of certification classes for a small set of voucher holders so that they may qualify for enhanced value vouchers, a voucher that pays slightly higher than other vouchers

*Measurable Objective 5.2:* Facilitate education of prospective landlords about the qualities of certified holders of Housing Choice Voucher tenants

*Action 5.3:* Increase voucher use in moderate income neighborhoods

*Measurable Objective 5.3:* Facilitate education of prospective landlords about the qualities of Housing Choice Voucher

*Action 5.4:* In concert with Mississippi PHAs, open dialogue with HUD concerning elements of PHA operational and program requirements that may contribute to over-concentrations of assisted units in areas with high poverty rates and high concentrations of racial and ethnic minorities

*Measurable Objective 5.4:* Number of attempts to open dialogue, notes and recordings of meetings, recordings and notes about which changes can effect positive change to affirmatively further fair housing

## FAIR HOUSING ACTION PLAN

The Community Services Division of the Mississippi Development Authority has developed a series of action steps that will be taken to address the impediments identified in the previous section. Though the MDA will take the lead in the implementation of these policies, it plans to do so through partnerships with statewide and local agencies that include Housing Education and Economic Development (HEED) and local Public Housing Agencies (PHA), as well as local

and regional fair housing organizations. Action plan items pertaining to the private sector impediments are included in the first table, which begins on the following page. Actions designed to address public sector impediments are outlined in the second table, which begins on the following page.

# Mississippi Development Authority

## Community Services Division

### 2015-2018 FAIR HOUSING AND AFFIRMATIVELY FURTHERING FAIR HOUSING OUTREACH PLAN

Private Sector Impediments	Action Plan	Action Steps	Measurable Objective	Responsible Agency	Timeline
<p>1. More frequent denial of home purchase loans to Black, Hispanic, and Female Applicants</p> <p>Goal: Increase homeownership opportunities among minorities and lower income households</p>	<p>1.1. Educate buyer through credit counseling and home purchase training</p>	<p>MDA will ensure and monitor non-profit homebuyers grantees provide counseling and training to prospective homebuyers;</p> <p>MDA will continue to sponsor the HEED Fair housing and Fair Lending Conference annually; and seek to identify other fair housing organizations to provide additional fair housing educational services.</p> <p>MDA will conduct outreach to realtors, lenders and related associations and will seek to provide homebuyer training and workshops at various time frames throughout the calendar year and increase awareness during April – Fair Housing month;</p> <p>MDA will provide Fair Housing outreach by utilizing newspapers of general circulation and Minority owned newspapers, electronic and social media applications.</p> <p>MDA will ensure that Local Units of Government and other non-profit grantees conduct fair housing activities as part of their certification to affirmatively further fair housing and program requirements.</p>	<p>1.1 Number of outreach and education activities conducted</p>	<p>MDA</p>	<p>All outreach activities will be conducted quarterly and/or bi- annually with an annual update of accomplishments</p> <p>Additional activities will be conducted as additional outreach opportunities become available.</p>

Private Sector Impediments	Action Plan	Action Steps	Measurable Objective	Responsible Agency	Timeline
<p>2. Predatory style lending falls more heavily on black borrowers</p> <p>Goal: Implement and sponsor credit repair and homebuyer training to decrease the predatory practices and disparities in lending</p>	<p>2.1 Educate buyers through credit counseling and home purchase training</p>	<p>MDA will seek to provide homebuyer training and conduct workshops in partnership with non-profit housing organizations;</p> <p>MDA will conduct outreach to MS Banking Associations and lenders thru non-profit homebuyer grantees and MDA coordinated trainings;</p> <p>Provide Fair Housing outreach newspapers of general circulation and Minority owned newspapers and electronic and social media applications;</p>	<p>2.1 Increase number of outreach and education activities conducted</p>	<p>MDA</p>	<p>All outreach activities will be conducted quarterly and/or bi- annually with an annual update of accomplishments</p> <p>Additional activities will be conducted as additional outreach opportunities become available.</p>

Private Sector Impediments	Action Plan	Action Steps	Measurable Objective	Responsible Agency	Timeline
<p>3. Discriminatory terms and conditions and refusal to rent</p> <p>Goal: Implement and sponsor fair housing education and outreach trainings and conferences and research analysis to reduce housing discrimination</p>	<p>3.1 Enhance testing and enforcement activities and document the outcomes of enforcement actions</p> <p>3.2 Continue to educate landlords and property management companies about Fair Housing Laws</p> <p>3.3 Continue to educate housing consumers in Fair Housing rights</p>	<p>MDA will partner with a non-profit fair housing organizations to enhance testing and enforcement activities;</p> <p>MDA will provide landlord tenant education information to local units of government and provide education outreach information at schedule trainings and workshops;</p> <p>MDA will continue to sponsor the HEED Fair housing and Fair Lending Conference annually;</p> <p>MDA will seek to provide homebuyer training and workshops during April – Fair Housing month and at additional trainings;</p> <p>Provide Fair Housing outreach in newspapers of general circulation and Minority owned newspapers and electronic and social media applications;</p>	<p>3.1 Increase number of testing and enforcement activities conducted</p> <p>3.2 Increase number of outreach and educational activities conducted</p> <p>3.3 Increase number of outreach and educational activities conducted</p>	MDA	<p>All outreach activities will be conducted quarterly and/or bi- annually with an annual update of accomplishments</p> <p>Additional activities will be conducted as additional outreach opportunities become available.</p>

Private Sector Impediments	Action Plan	Action Steps	Measurable Objective	Responsible Agency	Timeline
<p>4. Failure to make reasonable accommodation or modification.</p> <p>Goal: Increase the availability of accessible, affordable housing throughout the State</p>	<p>4.1 Enhance testing and enforcement activities and document outcomes of enforcement activities</p> <p>4.2 Educate housing providers about requirements for reasonable accommodation or modification</p> <p>4.3 Conduct audit testing on newly constructed residential units</p>	<p>MDA will work thru non-profit grantees in educating contractors of reasonable accommodation requirements;</p> <p>MDA will seek to provide 1<sup>st</sup> accessible training to grantee and at various workshop across the state;</p> <p>MDA will work thru a non-profit or seek ways as an agency to effectively conduct audit testing on newly constructed residential units;</p>	<p>4.1 Increase number of testing and enforcement activities conducted</p> <p>4.2 Increase number of training sessions conducted</p> <p>4.3 Number of audit tests completed</p>	MDA	<p>All outreach activities will be conducted quarterly and/or bi-annually with an annual update of accomplishments</p> <p>Additional activities will be conducted as additional outreach opportunities become available.</p>



# Mississippi Development Authority

## Community Services Division

### 2015- 2018 FAIR HOUSING AND AFFIRMATIVELY FURTHERING FAIR HOUSING OUTREACH PLAN

Public Sector Impediments	Action Plan	Action Steps	Measurable Objective	Responsible Agency	Timeline
<p>1. Insufficient understanding of Fair Housing Laws.</p> <p>Goal: Increase and enhance fair housing outreach and education efforts throughout the State</p>	<p>1.1 Conduct outreach and education to the public for several perspectives related to fair housing</p>	<p>MDA will continue to sponsor the HEED Fair housing and Fair Lending Conference annually; and seek to identify other fair housing organizations to provide additional services</p> <p>MDA will conduct outreach to realtors, lenders and related associations as an agency</p> <p>MDA will seek conduct fair housing workshops and trainings at time frames throughout the calendar year and increase awareness during April – Fair Housing month;</p> <p>Provide Fair Housing outreach in newspapers of general circulation and Minority owned newspapers, electronic and social media applications.</p> <p>Ensure Local Units of Government and other non-profit grantees conduct fair housing activities as part of their certification to affirmatively further fair housing and program requirements.</p>	<p>1.1 Number of outreach and education activities conducted</p> <p>1.2 Sponsor and or Partner public meetings during Fair Housing Month (April)</p> <p>1.3 Request and publish fair housing complaint data.</p>	MDA	<p>All outreach activities will be conducted quarterly and/or bi- annually with an annual update of accomplishments.</p> <p>Additional activities will be conducted as additional outreach opportunities become available</p>

Public Sector Impediments	Action Plan	Action Steps	Measurable Objective	Responsible Agency	Timeline
<p>2. Insufficient Fair Housing testing and enforcement in non-entitlement areas.</p> <p>Goal: Provide testing and enforcement activities in communities where discrimination has been shown to be particularly high and to determine if discriminatory practices are occurring</p>	<p>2.1 Identify an inventory of Fair Housing initiative Program (FHIP) grantees</p> <p>2.2 Collaborate with identified FHIPs</p>	<p>MDA will seek to identify additional FHIPs and other non-profit agencies to partner with to conduct fair housing testing and enforcements</p> <p>Ensure Local Units of Government grantees conduct fair housing activities as part of their certification to affirmatively further fair housing and program requirements.</p>	<p>2.1 Compile the inventory</p> <p>2.2 Conduct outreach and exploratory discussions with FHIP to perform testing and enforcement</p>	MDA	<p>All outreach activities will be conducted quarterly and/or bi- annually with an annual update of accomplishments</p> <p>Additional activities will be conducted as additional outreach opportunities become available</p>
<p>3. Fair Housing Infrastructure largely lacking.</p> <p>Goal: Identify Fair Housing entities and resources to provide infrastructure</p>	<p>3.1 Enhance testing and enforcement activities and document the outcomes of enforcement actions</p> <p>3.2 Continue to educate landlords and property management companies about Fair Housing Laws</p> <p>3.3 Continue to educate housing consumers in Fair Housing right</p>	<p>MDA will seek to identify additional FHIPs and other non-profit agencies to partner with to conduct fair housing testing and enforcements;</p> <p>MDA will work to partner with non-profit agencies, PHA's and local units of government to identify private and public property management companies to conduct landlord tenant education and outreach training and workshops;</p> <p>MDA will ensure Local Units of Government grantees conduct fair housing activities as part of their certification to affirmatively further fair housing and program requirements.</p>	<p>3.1 Increase number of testing and enforcement activities conducted</p> <p>3.2 Increase number of outreach and educational activities conducted</p> <p>3.3 Increase number of outreach and educational activities conducted</p>	MDA	<p>All outreach activities will be conducted quarterly and/or bi- annually with an annual update of accomplishments</p> <p>Additional activities will be conducted as additional outreach opportunities become available</p>

Public Sector Impediments	Action Plan	Action Steps	Measurable Objective	Responsible Agency	Timeline
<p>4: Lack of understanding of fair housing duties.</p> <p>Goal: Provide and ensure grantees, landlords, housing providers, real estate agents, property managers, lenders, housing authority staff, and non-profit housing staff with fair housing education, responsibilities, and clearly defined roles</p>	<p>4.1 Promote the Analysis of Impediments and Fair Housing Action Plans during Fair Housing Month (April)</p> <p>4.2 Sponsor/Partner quarterly Fair Housing trainings/ meetings</p>	<p>MDA will promote the AI at all workshops and meeting and seek to increase the awareness of the AI during April- Fair Housing Month;</p> <p>MDA will work with partners to provide quarterly and annually fair housing meetings and trainings;</p> <p>Ensure Local Units of Government and other non-profit grantees conduct fair housing activities as part of their certification to affirmatively further fair housing and program requirements;</p> <p>MDA will work to partner with non-profit agencies, PHA's and grantee to identify private and public property management companies to conduct landlord tenant education and outreach training and workshops;</p>	<p>4.1 Activities conducted to promote Fair Housing Month and AI</p> <p>4.2 Number of trainings/meetings held</p>	MDA	<p>All outreach activities will be conducted quarterly and/or bi- annually with an annual update of accomplishments</p> <p>Additional activities will be conducted as additional outreach opportunities become available</p>
<p>5: Overconcentration of vouchers, assisted housing, and lower-income housing in selected areas of the State</p> <p>Goal: Educate the public about the value of affordable housing and the importance of strategies to increase diversity in the housing market.</p>	<p>5.1 Add additional criteria to assisted housing locations and other investment decisions</p> <p>5.2 Create certification program/classes for select voucher holders that provide a slightly higher value</p> <p>5.3 Increase voucher use in moderate income neighborhoods</p> <p>5.4 Collaborate with PHAs regarding voucher program guidelines and requirements</p>	<p>MDA will work to coordinate and facilitate outreach opportunities with PHA and HUD to discuss the action plan for these impediments.</p>	<p>5.1: Determine the additional criteria, such as concentration of poverty or concentration of racial or ethnic minority, and incorporate this in the decision process</p> <p>5.2 Evaluate the implications of redevelopment and other investments in areas with high rates of poverty and/or higher concentrations of racial and ethnic minorities</p> <p>5.3 Facilitate education of prospective landlords about the qualities of certified holders of Housing Choice Voucher tenants</p> <p>5.4 Facilitate education of prospective landlords about</p>	MDA will work as a facilitator in partnership the PHA's to address this identified impediment.	<p>This will be an ongoing activity and schedule for the various organizations involved are determined.</p> <p>Additional activities will be conducted as additional outreach opportunities become available</p>

			<p>the qualities of Housing Choice Voucher</p> <p>5.5 Number of attempts to open dialogue, notes and recordings of meetings, recordings and notes about which changes can effect positive change to affirmatively further fair housing</p>		
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## SECTION IV. FAIR HOUSING ANALYSIS

This section presents demographic, economic, and housing information. Data were used to analyze a broad range of socio-economic characteristics, including population growth, race, ethnicity, disability, employment, poverty, and housing trends; these data are also available by Census tract, and are shown in geographic maps. Ultimately, the information presented in this section illustrates the underlying conditions that shape housing market behavior and housing choice in Starkville. This report contains data covering the entire service area of the Housing Authority, and does not reflect solely the fair housing issues within the Housing Authority itself.

### A. SOCIO-ECONOMIC OVERVIEW

#### DEMOGRAPHICS

##### Population Estimates

Table IV.1, shows the population for Starkville city. As can be seen, the population in Starkville city increased from 23,888 persons in 2010 to 25,352 person in 2017, or by 6.1 percent.

Several pieces of data presented in the profile are only available at the county level. A sub-set of the county level data are presented here to give a more complete view of Starkville city. Although a city may span several counties, for the county level data pieces, Oktibbeha County was selected.

##### Census Demographic Data

In the 1980, 1990, and 2000 decennial censuses, the Census Bureau released several tabulations in addition to the full SF1 100 percent count data including the one-in-six SF3 sample. These additional samples, such as the SF3, asked supplementary questions regarding income and household attributes that were not asked in the 100 percent count. In the 2010 decennial census, the Census Bureau did not collect additional sample data, such as the SF3, and thus many important housing and income concepts are not available in the 2010 Census.

To study these important concepts the Census Bureau distributes the American Community Survey every year to a sample of the population and quantifies the results as one-, three- and five-year averages. The one-year sample only includes responses from the year the survey was implemented, while the five-year sample includes responses over a five-year period. Since the five-year estimates include more responses, the estimates can be tabulated down to the Census tract level, and considered more robust than the one or three year sample estimates.

**Table IV.1**  
**Population Estimates**  
Starkville city  
Census Population Estimates

Year	Population	Percent Yearly Change
2000	21,757	.
2001	21,870	0.5%
2002	21,823	-0.2%
2003	21,975	0.7%
2004	22,105	0.6%
2005	22,354	1.1%
2006	22,844	2.2%
2007	23,279	1.9%
2008	23,373	0.4%
2009	23,762	1.7%
2010	23,888	0.5%
2011	24,070	0.8%
2012	24,385	1.3%
2013	24,532	0.6%
2014	24,599	0.3%
2015	25,018	1.7%
2016	25,230	0.8%
2017	25,352	0.5%

## Population Characteristics

Table IV.2 shows population by age for the 2000 and 2010 Census. The population changed by 9.2 percent overall between 2000 and 2010. Various age cohorts changed at different rates. The elderly population, or persons aged 65 or older, changed by 19.5 percent to a total of 2,244 persons in 2010. Those aged 25 to 34 changed by 23.1 percent, and those aged under 5 changed by 13.1 percent.

<b>Table IV.2</b> <b>Population by Age</b> Starkville city 2000 & 2010 Census SF1 Data					
Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	1,326	6.1%	1,500	6.3%	13.1%
5 to 19	3,934	18.0%	3,771	15.8%	-4.1%
20 to 24	5,597	25.6%	5,998	25.1%	7.2%
25 to 34	3,302	15.1%	4,065	17.0%	23.1%
35 to 54	4,483	20.5%	4,440	18.6%	-1.0%
55 to 64	1,349	6.2%	1,870	7.8%	38.6%
65 or Older	1,878	8.6%	2,244	9.4%	19.5%
<b>Total</b>	<b>21,869</b>	<b>100.0%</b>	<b>23,888</b>	<b>100.0%</b>	<b>9.2%</b>

The elderly population is further explored in Table IV.3. Those aged 65 to 66 changed by 36.2 percent between 2000 and 2010, resulting in a population of 282 persons. Those aged 85 or older changed by 35.4 percent during the same time period, and resulted in 348 persons over age 85 in 2010.

<b>Table IV.3</b> <b>Elderly Population by Age</b> Starkville city 2000 & 2010 Census SF1 Data					
Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	207	11.0%	282	12.6%	36.2%
67 to 69	340	18.1%	375	16.7%	10.3%
70 to 74	426	22.7%	504	22.5%	18.3%
75 to 79	424	22.6%	450	20.1%	6.1%
80 to 84	224	11.9%	285	12.7%	27.2%
85 or Older	257	13.7%	348	15.5%	35.4%
<b>Total</b>	<b>1,878</b>	<b>100.0%</b>	<b>2,244</b>	<b>100.0%</b>	<b>19.5%</b>

Population by race and ethnicity is shown in Table IV.4, representing 59.6 percent of the white population in 2010. The black population changed by 26.0 percent, represented 34.6 percent of the population in 2010. The American Indian and Asian populations represented 0.2 and 3.7 percent, respectively, in 2010. As for ethnicity, the Hispanic population changed by 45.9 percent between 2000 and 2010, compared to the 8.7 percent change for non-Hispanics.



<b>Table IV.4</b> <b>Population by Race and Ethnicity</b> Starkville city 2000 & 2010 Census SF1 Data					
Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	14,128	64.6%	14,246	59.6%	0.8%
Black	6,565	30.0%	8,274	34.6%	26.0%
American Indian	32	0.1%	48	0.2%	50.0%
Asian	821	3.8%	894	3.7%	8.9%
Native Hawaiian/ Pacific Islander	8	0.0%	13	0.1%	62.5%
Other	141	0.6%	104	0.4%	-26.2%
Two or More Races	174	0.8%	309	1.3%	77.6%
<b>Total</b>	<b>21,869</b>	<b>100.0%</b>	<b>23,888</b>	<b>100.0%</b>	<b>9.2%</b>
<b>Hispanic</b>	294	1.3%	429	1.8%	45.9%
<b>Non-Hispanic</b>	21,575	98.7%	23,459	98.2%	8.7%

Population by race and ethnicity through 2016 is shown in Table IV.5. The white population represented 57.3 percent of the population in 2016, compared with the black population accounting for 36.5 percent of the population. Hispanic households represented 1.3 percent of the population in 2016.

<b>Table IV.5</b> <b>Population by Race and Ethnicity</b> Starkville city 2010 Census & 2016 Five-Year ACS				
Race	2010 Census		2016 Five-Year ACS	
	Population	% of Total	Population	% of Total
White	14,246	59.6%	14,321	57.3%
Black	8,274	34.6%	9,138	36.5%
American Indian	48	0.2%	18	0.1%
Asian	894	3.7%	900	3.6%
Native Hawaiian/ Pacific Islander	13	0.1%	0	0.0%
Other	104	0.4%	184	0.7%
Two or More Races	309	1.3%	450	1.8%
<b>Total</b>	<b>23,888</b>	<b>100.0%</b>	<b>25,011</b>	<b>100.0%</b>
<b>Non-Hispanic</b>	23,459	98.2%	24,690	98.7%
<b>Hispanic</b>	429	1.8%	321	1.3%

The population by race is broken down further by ethnicity in Table IV.6. While the white non-Hispanic population changed by -0.2 percent between 2000 and 2010, the white Hispanic population changed by 117.1 percent. The black non-Hispanic population changed by 26.0 percent, while the black Hispanic population changed by 29.6 percent.

Table IV.6 Population by Race and Ethnicity Starkville city 2000 & 2010 Census Data					
Race	2000		2010 Census		% Change 00 - 10
	Population	% of Total	Population	% of Total	
Non-Hispanic					
White	14,005	64.9%	13,979	59.6%	-0.2%
Black	6,538	30.3%	8,239	35.1%	26.0%
American Indian	31	0.1%	44	0.2%	41.9%
Asian	819	3.8%	889	3.8%	8.5%
Native Hawaiian/ Pacific Islander	8	0.0%	10	0.0%	25.0%
Other	21	0.1%	23	0.1%	9.5%
Two or More Races	153	0.7%	275	1.2%	79.7%
Total Non-Hispanic	21,575	100.0%	23,459	100.0%	8.7%
Hispanic					
White	123	41.8%	267	62.2%	117.1%
Black	27	9.2%	35	8.2%	29.6%
American Indian	1	0.3%	4	0.9%	300.0%
Asian	2	0.7%	5	1.2%	150.0%
Native Hawaiian/ Pacific Islander	0	0.0%	3	0.7%	inf%
Other	120	40.8%	81	18.9%	-32.5%
Two or More Races	21	7.1%	34	7.9%	61.9%
Total Hispanic	294	100.0%	429	100.0%	45.9%
Total Population	21,869	100.0%	23,888	100.0%	9.2%

The change in race and ethnicity between 2010 and 2016 is shown in Table IV.7. During this time, the total non-Hispanic population was 24,690 persons in 2016. The Hispanic population was 321 persons.

<b>Table IV.7</b> <b>Population by Race and Ethnicity</b> Starkville city 2010 Census & 2016 Five-Year ACS				
Race	2010 Census		2016 Five-Year ACS	
	Population	% of Total	Population	% of Total
<b>Non-Hispanic</b>				
White	13,979	59.6%	14,227	57.6%
Black	8,239	35.1%	9,105	36.9%
American Indian	44	0.2%	18	0.1%
Asian	889	3.8%	900	3.6%
Native Hawaiian/ Pacific Islander	10	0.0%	0	0.0%
Other	23	0.1%	20	0.1%
Two or More Races	275	1.2%	420	1.7%
<b>Total Non-Hispanic</b>	<b>23,459</b>	<b>100.0%</b>	<b>24,690</b>	<b>100.0%</b>
<b>Hispanic</b>				
White	267	62.2%	94	29.3%
Black	35	8.2%	33	10.3%
American Indian	4	0.9%	0	0.0%
Asian	5	1.2%	0	0.0%
Native Hawaiian/ Pacific Islander	3	0.7%	0	0.0%
Other	81	18.9%	164	51.1%
Two or More Races	34	7.9%	30	9.3%
<b>Total Hispanic</b>	<b>429</b>	<b>100.0%</b>	<b>321</b>	<b>100.0%</b>
<b>Total Population</b>	<b>23,888</b>	<b>100.0%</b>	<b>25,011</b>	<b>100.0%</b>

Households by type and tenure are shown in Table IV.8. Family households represented 48.1 percent of households, while non-family households accounted for 51.9 percent. These changed from 47.2 and 52.8 percent, respectively.

<b>Table IV.8</b> <b>Household Type by Tenure</b> Starkville city 2010 Census SF1 & 2016 Five-Year ACS Data				
Household Type	2010 Census		2016 Five-Year ACS	
	Households	Households	Households	% of Total
Family Households	5,054	47.2%	4,654	48.1%
Married-Couple Family	3,170	62.7%	3,218	69.1%
Owner-Occupied	2,248	70.9%	2,325	72.2%
Renter-Occupied	922	29.1%	893	27.8%
Other Family	1,884	37.3%	1,436	40.5%
Male Householder, No Spouse Present	365	19.4%	345	25.4%
Owner-Occupied	121	33.2%	60	17.4%
Renter-Occupied	244	66.8%	285	82.6%
Female Householder, No Spouse Present	1,519	80.6%	1,091	105.8%
Owner-Occupied	434	28.6%	209	19.2%
Renter-Occupied	1,085	71.4%	882	80.8%
Non-Family Households	5,652	52.8%	5,018	51.9%
Owner-Occupied	1,206	21.3%	1,484	29.6%
Renter-Occupied	4,446	78.7%	3,534	70.4%
<b>Total</b>	<b>10,706</b>	<b>100.0%</b>	<b>9,672</b>	<b>100.0%</b>

The group quarters population was 683 in 2010, compared to 712 in 2000. Institutionalized populations experienced a 5.8 percent change between 2000 and 2010. Non-Institutionalized populations experienced a -12.6 percent change during this same time period.

Table IV.9 Group Quarters Population Starkville city 2000 & 2010 Census SF1 Data					
Group Quarters Type	2000 Census		2010 Census		% Change 00-10
	Population	% of Total	Population	% of Total	
Institutionalized					
Correctional Institutions	78	23.6%	44	12.6%	-43.6%
Juvenile Facilities	.	.	0	0.0%	.
Nursing Homes	232	70.3%	305	87.4%	31.5%
Other Institutions	20	6.1%	0	0.0%	-100.0%
Total	330	100.0%	349	100.0%	5.8%
Non-Institutionalized					
College Dormitories	332	86.9%	334	100.0%	0.6%
Military Quarters	0	0.0%	0	0.0%	%
Other Non-Institutionalized	50	13.1%	0	0.0%	-100.0%
Total	382	100.0%	334	100.0%	-12.6%
Group Quarters Population	712	100.0%	683	100.0%	-4.1%

The number of foreign born persons is shown in Table IV.10. An estimated 0.8 percent of the population was born in China excluding Hong Kong and Taiwan with 0.8 percent born in Mexico and another 0.6 percent were born in Korea .

**Table IV.10**  
**Place of Birth for the Foreign-Born Population**  
 Starkville city  
 2016 Five-Year ACS

Number	Country	Number of Persons	Percent of Total Population
#1 country of origin	China excluding Hong Kong and Taiwan	199	0.8%
#2 country of origin	Mexico	192	0.8%
#3 country of origin	Korea	144	0.6%
#4 country of origin	India	124	0.5%
#5 country of origin	Cameroon	84	0.3%
#6 country of origin	Czechoslovakia	57	0.2%
#7 country of origin	Bangladesh	42	0.2%
#8 country of origin	Turkey	38	0.2%
#9 country of origin	Russia	34	0.1%
#10 country of origin	Canada	31	0.1%

Limited English Proficiency and the language spoken at home are shown in Table IV.11. An estimated 0.5 percent of the population speaks Chinese at home, followed by 0.4 percent speaking Arabic.

**Table IV.11**  
**Limited English Proficiency and Language Spoken at Home**  
 Starkville city  
 2016 Five-Year ACS

Number	Country	Number of Persons	Percent of Total Population
#1 LEP Language	Chinese	128	0.5%
#2 LEP Language	Arabic	85	0.4%
#3 LEP Language	Other Indo-European languages	67	0.3%
#4 LEP Language	Other Asian and Pacific Island languages	53	0.2%
#5 LEP Language	Other and unspecified languages	52	0.2%
#6 LEP Language	Spanish	52	0.2%
#7 LEP Language	Korean	42	0.2%
#8 LEP Language	Vietnamese	16	0.1%
#9 LEP Language	French, Haitian, or Cajun	14	0.1%
#10 LEP Language	German or other West Germanic languages	0	0%

## Education

Education and employment data, as estimated by the 2016 ACS, is presented in Table IV.12. In 2016, some 10,956 persons were employed and 1,030 were unemployed. This totaled a labor force of 11,986 persons. The unemployment rate for Starkville city was estimated to be 8.6 percent in 2016.

<b>Table IV.12</b> <b>Employment, Labor Force and Unemployment</b> Starkville city 2016 Five-Year ACS Data	
<b>Employment Status</b>	<b>2016 Five-Year ACS</b>
Employed	10,956
Unemployed	1,030
<b>Labor Force</b>	<b>11,986</b>
Unemployment Rate	8.6%

In 2016, 92.4 percent of households in Starkville city had a high school education or greater.

<b>Table IV.13</b> <b>High School or Greater Education</b> Starkville city 2016 Five-Year ACS Data	
<b>Education Level</b>	<b>Households</b>
High School or Greater	8,941
Total Households	9,672
<b>Percent High School or Above</b>	<b>92.4%</b>

As seen in Table IV.14, 14.0 percent of the population had a high school diploma or equivalent, another 41.4 percent have some college, 18.0 percent have a Bachelor's Degree, and 17.4 percent of the population had a graduate or professional degree.

<b>Table IV.14</b> <b>Educational Attainment</b> Starkville city 2016 Five-Year ACS Data		
<b>Education Level</b>	<b>Population</b>	<b>Percent</b>
Less Than High School	1,901	9.3%
High School or Equivalent	2,841	14.0%
Some College or Associates Degree	8,427	41.4%
Bachelor's Degree	3,656	18.0%
Graduate or Professional Degree	3,536	17.4%
<b>Total Population Above 18 years</b>	<b>20,361</b>	<b>100.0%</b>

## ECONOMICS

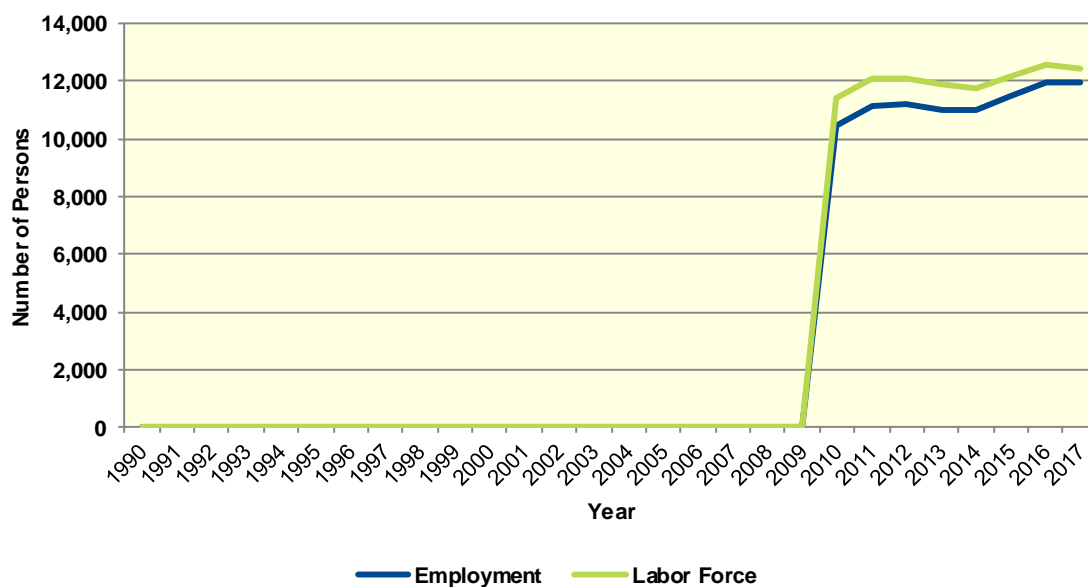
### Labor Force

Table IV.15, shows the labor force statistics for Starkville city from 1990 to the present. Over the entire series the lowest unemployment rate occurred in 1990 with a rate of 0.0 percent. The highest level of unemployment occurred during 2010 rising to a rate of 8.6 percent. This compared to a statewide low of 5.1 percent in 1999 and statewide high of 10.4 percent in 2010. Over the last year the unemployment rate in Starkville city decreased from 4.8 percent in 2016 to 4.1 percent in 2017, which compared to a statewide decrease to 5.1 percent.

<b>Table IV.15</b> <b>Labor Force Statistics</b> Starkville city 1990 - 2017 BLS Data					
Year	Starkville city				Statewide Unemployment Rate
	Unemployment	Employment	Labor Force	Unemployment Rate	
1990	0	0	0	0.0%	7.6%
1991	0	0	0	0.0%	8.5%
1992	0	0	0	0.0%	8.1%
1993	0	0	0	0.0%	6.6%
1994	0	0	0	0.0%	6.3%
1995	0	0	0	0.0%	6.2%
1996	0	0	0	0.0%	6.0%
1997	0	0	0	0.0%	5.7%
1998	0	0	0	0.0%	5.3%
1999	0	0	0	0.0%	5.1%
2000	0	0	0	0.0%	5.4%
2001	0	0	0	0.0%	5.5%
2002	0	0	0	0.0%	6.6%
2003	0	0	0	0.0%	6.3%
2004	0	0	0	0.0%	6.2%
2005	0	0	0	0.0%	7.5%
2006	0	0	0	0.0%	6.5%
2007	0	0	0	0.0%	6.1%
2008	0	0	0	0.0%	6.6%
2009	0	0	0	0.0%	9.5%
2010	984	10,440	11,424	8.6%	10.4%
2011	974	11,125	12,099	8.1%	10.0%
2012	889	11,193	12,082	7.4%	9.0%
2013	836	11,030	11,866	7.0%	8.5%
2014	737	11,024	11,761	6.3%	7.5%
2015	674	11,488	12,162	5.5%	6.4%
2016	601	11,960	12,561	4.8%	5.8%
2017	508	11,930	12,438	4.1%	5.1%

Diagram IV.1, shows the employment and labor force for Starkville city. The difference between the two lines represents the number of unemployed persons. In the most recent year, employment stood at 11,930 persons, with the labor force reaching 12,438, indicating there were a total of 508 unemployed persons.

**Diagram IV.1**  
**Employment and Labor Force**  
 Starkville city  
 1990 – 2017 BLS Data

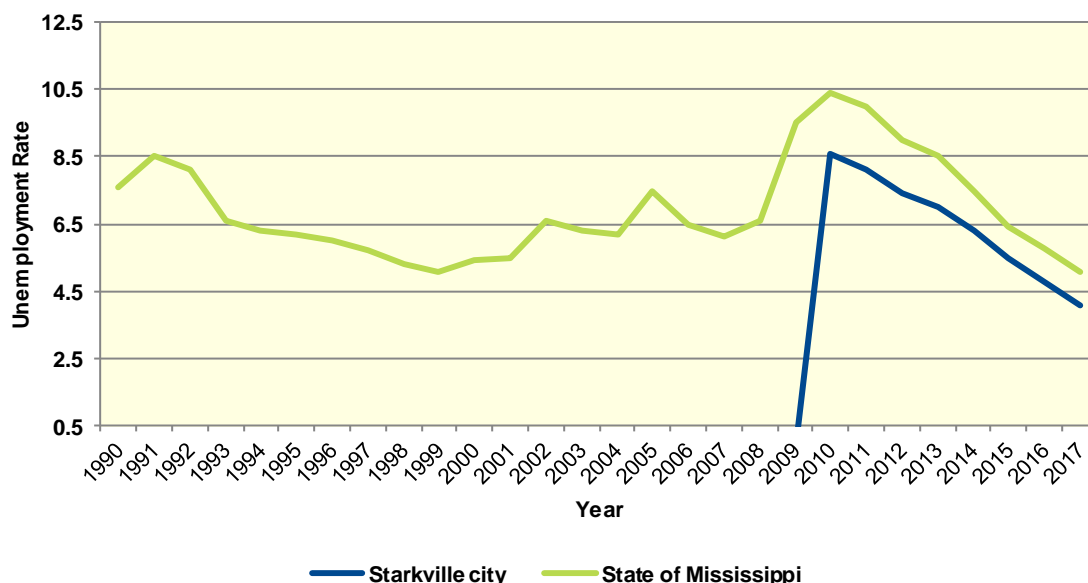


## Unemployment

Diagram IV.2 shows the unemployment rate for both the State and Starkville city. During the 1990's the average rate for Starkville city was 0.0 percent, which compared to 6.5 percent statewide. Between 2000 and 2010 the unemployment rate had an average of 0.0 percent, which compared to 6.6 percent statewide. Since 2010 the average unemployment rate was 6.4 percent. Over the course of the entire period Starkville city had an average unemployment rate lower than the state, 6.4 percent for Starkville city, versus 6.9 percent statewide.



**Diagram IV.2**  
**Annual Unemployment Rate**  
 Starkville city  
 1990 – 2016 BLS Data



### Oktibbeha County Earnings

The Bureau of Economic Analysis (B.E.A.) produces regional economic accounts which provide a consistent framework for analyzing and comparing individual state and local area economies. Diagram IV.3 shows real average earnings per job for Oktibbeha County from 1990 to 2017. Over this period the average earnings per job for Oktibbeha County was 37,143 dollars, which was lower than the statewide average of 40,877 dollars over the same period.

**Diagram IV.3**  
**Real Average Earnings Per Job**  
 Oktibbeha County  
 BEA Data 1990 - 2017

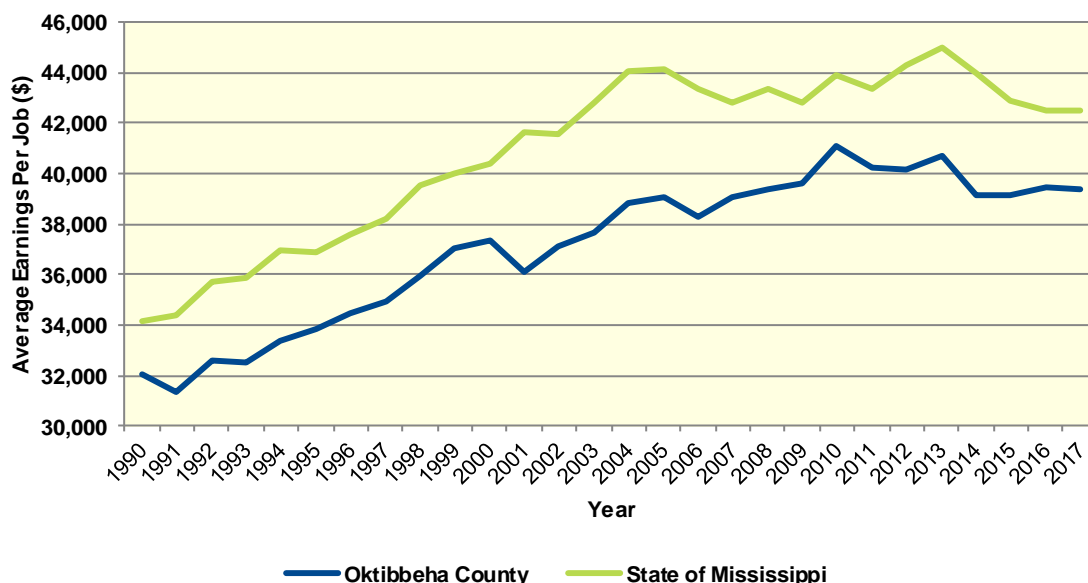
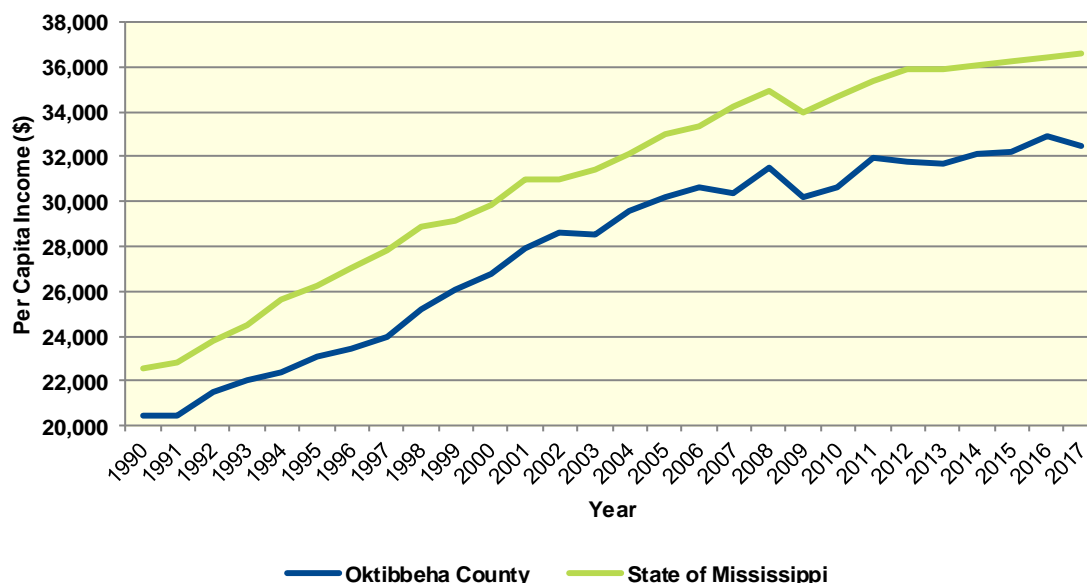


Diagram IV.4 shows real per capita income for Oktibbeha County from 1990 to 2017, which is calculated by dividing total personal income from all sources by population. Per capita income is a broader measure of wealth than real average earnings per job, which only captures the working population. Over this period the real per capita income for Oktibbeha County was 27,812 dollars, which was lower than the statewide average of 31,091 dollars over the same period.

**Diagram IV.4**  
**Real Per Capita Income**  
 Oktibbeha County  
 BEA Data 1990 - 2017



## Poverty

Poverty is the condition of having insufficient resources or income. In its extreme form, poverty is a lack of basic human needs, such as adequate and healthy food, clothing, housing, water, and health services. According to the Census Bureau's Small Area Income and Poverty Estimates Program, the number of individuals in poverty increase from 11,447 in 2010 to 11,489.0 in 2017, with the poverty rate reaching 25.5 percent in 2017. This compared to a state poverty rate of 19.9 percent and a national rate of 13.4 percent in 2017. Table IV.16, presents poverty data for Oktibbeha County.

To compare the poverty rate against more recent data, Table IV.17, shows poverty by age from the 2010 and 2016 five-year ACS data. As can be seen, the 2010 5-year ACS had a poverty rate of 35.3 percent versus 33.1 percent in the most recent 2016 data.

**Table IV.16**  
**Persons in Poverty**  
 Oktibbeha County  
 2000–2017 SAIPE Estimates

Year	Persons in Poverty	Poverty Rate
2000	7,546	19.5%
2001	8,610	22.3%
2002	8,768	22.6%
2003	8,146	21.6%
2004	8,445	22.3%
2005	10,608	28.3%
2006	10,561	27.9%
2007	12,522	31.4%
2008	13,238	33.2%
2009	13,177	32.9%
2010	11,447	26.5%
2011	14,532	33.5%
2012	14,765	33.6%
2013	13,819	31.2%
2014	13,295	29.9%
2015	12,193	27.1%
2016	12,741	28.3%
2017	11,489	25.5%

<b>Table IV.17</b> <b>Poverty by Age</b> Starkville city 2010 Five-Year ACS & 2016 Five-Year ACS Data				
Age	2010 Five-Year ACS		2016 Five-Year ACS	
	Persons in Poverty	% of Total	Persons in Poverty	% of Total
Under 6	534	6.6%	757	9.8%
6 to 17	814	10.0%	806	10.4%
18 to 64	6,481	80.0%	5,917	76.3%
65 or Older	274	3.4%	277	3.6%
<b>Total</b>	<b>8,103</b>	<b>100.0%</b>	<b>7,757</b>	<b>100.0%</b>
<b>Poverty Rate</b>	<b>35.3%</b>	<b>.</b>	<b>33.1%</b>	<b>.</b>

## HOUSING

### Housing Production

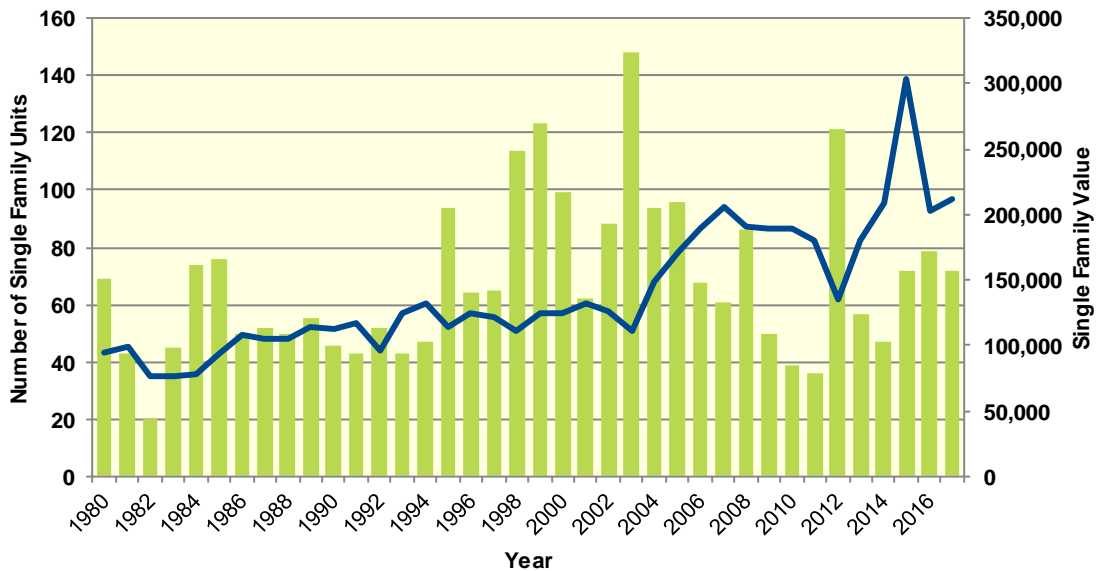
The Census Bureau reports building permit authorizations and “per unit” valuation of building permits annually. Single-family construction usually represents most residential development in the area. Single-family building permit authorizations in Starkville city decreased from 79 authorizations in 2016 to 72 authorizations in 2017.

The real value of single-family building permits increased from 202,248 dollars in 2016 to 212,146 dollars in 2017. This compares to an increase in permit value statewide, with values rising from 176,345 dollars in 2016 to 177,631 dollars in 2017. Additional details are given in Table IV.18.

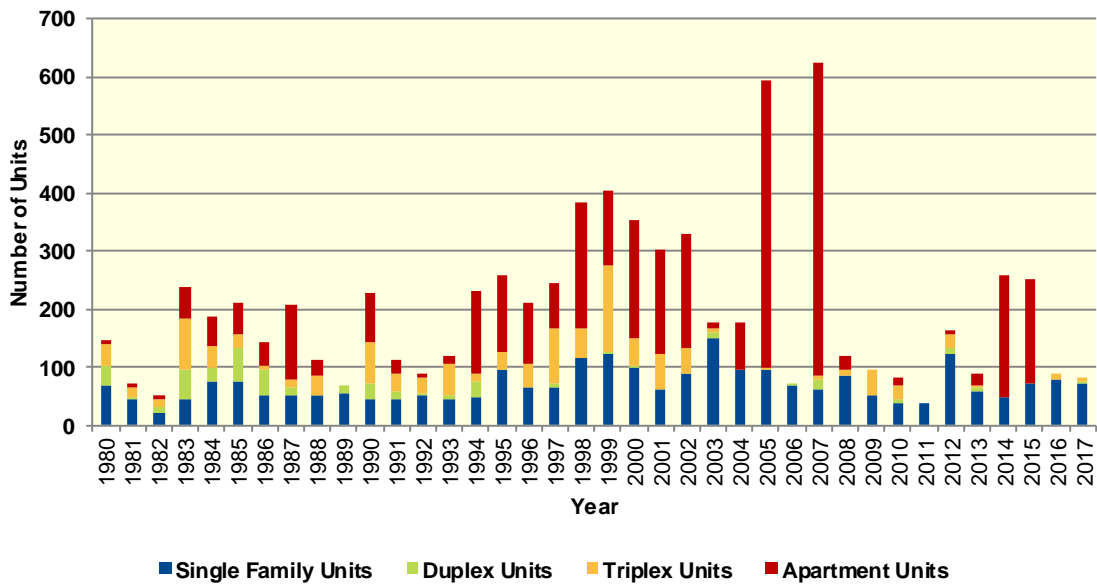
**Table IV.18**  
**Building Permits and Valuation**  
 Starkville city  
 Census Bureau Data, 1980–2017

Year	Authorized Construction in Permit Issuing Areas					Per Unit Valuation, (Real 2016\$)	
	Single-Family	Duplex Units	Tri- and Four-Plex	Multi-Family Units	Total Units	Single-Family Units	Multi-Family Units
1980	69	34.0	36.0	8	147	94,075	79,862
1981	43	6.0	16.0	8	73	98,584	43,829
1982	20	12.0	12.0	8	52	76,601	35,769
1983	45	50.0	87	57	239	76,646	22,845
1984	74	26.0	37.0	51	188	77,365	39,350
1985	76	58.0	23.0	54	211	93,568	46,122
1986	50	44.0	8.0	42	144	107,887	42,781
1987	52	12.0	13.0	130.0	207	105,478	36,131
1988	50	2.0	32.0	28	112	105,801	40,387
1989	55	14.0	0.0	0	69	114,145	0
1990	46	26.0	70.0	85	227	112,148	40,768
1991	43	16.0	28.0	26.0	113	116,986	32,562
1992	52	2.0	28.0	8.0	90	96,197	35,358
1993	43	8.0	53.0	15.0	119	124,676	42,386
1994	47	28.0	12.0	145	232	132,729	34,297
1995	94	0.0	32.0	131	257	113,904	30,346
1996	64	0.0	40.0	106	210	125,339	46,299
1997	65	6.0	94.0	79	244	121,972	47,850
1998	114	2.0	52.0	214	382	111,601	22,481
1999	123	2.0	150.0	130	405	125,165	38,614
2000	99	2.0	49.0	203	353	124,714	24,801
2001	62	0.0	60.0	181	303	131,724	48,218
2002	88	0.0	44.0	196	328	126,509	47,029
2003	148	12.0	6.0	10	176	111,857	46,113
2004	94	0.0	0.0	83	177	148,879	56,354
2005	96	0.0	4.0	495	595	172,023	25,906
2006	68	4.0	0.0	0	72	189,722	0
2007	61	16.0	9.0	537	623	205,205	39,926
2008	86	0.0	8.0	24	118	191,482	79,762
2009	50	0.0	45.0	0.0	95	190,042	0
2010	39	4.0	24.0	16.0	83	188,860	49,529
2011	36	0.0	0.0	0.0	36	180,045	0
2012	121	12.0	23.0	8.0	164	135,841	49,523
2013	57	8.0	3.0	22	90	180,603	40,989
2014	47	0.0	0.0	210	257	208,984	85,018
2015	72	0.0	0.0	180.0	252	303,367	77,462
2016	79	0.0	8.0	0.0	87	202,248	0
2017	72	2.0	8.0	0.0	82	212,146	0

**Diagram IV.5**  
**Single-Family Permits**  
 Starkville city  
 Census Bureau Data, 1980–2017



**Diagram IV.6**  
**Total Permits by Unit Type**  
 Starkville city  
 Census Bureau Data, 1980–2017



## Housing Characteristics

Housing types by unit are shown in Table IV.19. In 2016, there were 12,272 housing units, up from 10,275 in 2000. Single-family units accounted for 48.5 percent of units in 2016, compared to 47.3 percent in 2000. Apartment units accounted for 27.4 percent in 2016, compared to 24.7 percent in 2000.

<b>Table IV.19</b> <b>Housing Units by Type</b> Starkville city 2000 Census SF3 & 2016 Five-Year ACS Data				
Unit Type	2000 Census		2016 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	4,862	47.3%	5,952	48.5%
Duplex	941	9.2%	1,410	11.5%
Tri- or Four-Plex	1,384	13.5%	1,337	10.9%
Apartment	2,540	24.7%	37	27.4%
Mobile Home	548	5.3%	206	1.7%
Boat, RV, Van, Etc.	0	0.0%	0	0.0%
<b>Total</b>	<b>10,275</b>	<b>100.0%</b>	<b>12,272</b>	<b>100.0%</b>

In 2010, there were 11,509 housing units, compared with 12,272 in 2016. Single-family units accounted for 48.5 percent of units in 2016, compared to 46.2 percent in 2010. Apartment units accounted for 27.4 percent in 2016, compared to 30.0 percent in 2010.

<b>Table IV.20</b> <b>Housing Units by Type</b> Starkville city 2010 Five-Year ACS & 2016 Five-Year ACS Data				
Unit Type	2010 Five-Year ACS		2016 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	5,315	46.2%	5,952	48.5%
Duplex	736	6.4%	1,410	11.5%
Tri- or Four-Plex	1,576	13.7%	1,337	10.9%
Apartment	3,457	30.0%	3,367	27.4%
Mobile Home	425	3.7%	206	1.7%
Boat, RV, Van, Etc.	0	0.0%	0	0.0%
<b>Total</b>	<b>11,509</b>	<b>100.0%</b>	<b>12,272</b>	<b>100.0%</b>

Some 91.0 percent of housing was occupied in 2010, compared to 92.8 percent in 2000. Owner-occupied housing changed 3.4 percent between 2000 and 2010, ending with owner-occupied units representing 37.4 percent of units. Vacant units changed by 45.5 percent, resulting in 1,061 vacant units in 2010.

<b>Table IV.21</b> <b>Housing Units by Tenure</b> Starkville city 2000 & 2010 Census SF1 Data					
Tenure	2000 Census		2010 Census		% Change 00–10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	9,462	92.8%	10,706	91.0%	13.1%
Owner-Occupied	3,876	41.0%	4,009	37.4%	3.4%
Renter-Occupied	5,586	59.0%	6,697	62.6%	19.9%
Vacant Housing Units	729	7.2%	1,061	9.0%	45.5%
<b>Total Housing Units</b>	<b>10,191</b>	<b>100.0%</b>	<b>11,767</b>	<b>100.0%</b>	<b>15.5%</b>

Table IV.22 shows housing units by tenure from 2010 to 2016. By 2016, there were 12,272 housing units. An estimated 42.2 percent were owner-occupied, and 21.2 percent were vacant.

<b>Table IV.22</b> <b>Housing Units by Tenure</b> Starkville city 2010 Census & 2016 Five-Year ACS Data				
Tenure	2010 Census		2016 Five-Year ACS	
	Units	% of Total	Units	% of Total
Occupied Housing Units	10,706	91.0%	9,672	78.8%
Owner-Occupied	4,009	37.4%	4,078	42.2%
Renter-Occupied	6,697	62.6%	5,594	57.8%
Vacant Housing Units	1,061	9.0%	2,600	21.2%
<b>Total Housing Units</b>	<b>11,767</b>	<b>100.0%</b>	<b>12,272</b>	<b>100.0%</b>

Households by household size are shown in Table IV.23. There were a total of 10,706 households in 2010, up from 9,462 in 2000. One person households changed by 23.4 percent between 2000 and 2010, while two person households changed by 11.6 percent. Three and four person households changed by 4.7 percent and 3.9 percent respectively, representing 15.0 percent and 9.6 percent of the population in 2010.

<b>Table IV.23</b> <b>Households by Household Size</b> Starkville city 2000 & 2010 Census SF1 Data					
Size	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
One Person	3,041	32.1%	3,754	35.1%	23.4%
Two Persons	3,386	35.8%	3,778	35.3%	11.6%
Three Persons	1,536	16.2%	1,608	15.0%	4.7%
Four Persons	986	10.4%	1,024	9.6%	3.9%
Five Persons	372	3.9%	364	3.4%	-2.2%
Six Persons	86	0.9%	123	1.1%	43.0%
Seven Persons or More	55	0.6%	55	0.5%	0.0%
<b>Total</b>	<b>9,462</b>	<b>100.0%</b>	<b>10,706</b>	<b>100.0%</b>	<b>13.1%</b>

Households by income for the 2010 and 2016 5-year ACS are shown in Table IV.24. Households earning more than 100,000 dollars per year represented 16.0 percent of households in 2016, compared to 11.2 percent in 2010. Meanwhile, households earning less than 15,000 dollars accounted for 28.9 percent of households in 2016, compared to 35.6 percent in 2000.



<b>Table IV.24</b> <b>Households by Income</b> Starkville city 2010 Five-Year ACS & 2016 Five-Year ACS Data				
Income	2010 Five-Year ACS		2016 Five-Year ACS	
	Households	% of Total	Households	% of Total
Less than \$15,000	3,586	35.6%	2,798	28.9%
\$15,000 to \$19,999	817	8.1%	615	6.4%
\$20,000 to \$24,999	487	4.8%	554	5.7%
\$25,000 to \$34,999	1,014	10.1%	1,194	12.3%
\$35,000 to \$49,999	1,160	11.5%	884	9.1%
\$50,000 to \$74,999	1,194	11.9%	1,196	12.4%
\$75,000 to \$99,999	676	6.7%	886	9.2%
\$100,000 or More	1,132	11.2%	1,545	16.0%
<b>Total</b>	<b>10,066</b>	<b>100.0%</b>	<b>9,672</b>	<b>100.0%</b>

Table IV.25, shows households by year home built for the 2010 and 2016 5-year ACS data. Housing units built between 2000 and 2009, account for 18.1 percent in 2010 and 14.0 percent of households. Housing units built prior to 1939 represented 2.9 percent of households in 2016 and 3.2 percent of households in 2010.

<b>Table IV.25</b> <b>Households by Year Home Built</b> Starkville city 2010 Five-Year ACS & 2016 Five-Year ACS Data				
Year Built	2010 Five-Year ACS		2016 Five-Year ACS	
	Households	% of Total	Households	% of Total
1939 or Earlier	321	3.2%	276	2.9%
1940 to 1949	365	3.6%	212	2.2%
1950 to 1959	625	6.2%	558	5.8%
1960 to 1969	1,445	14.4%	978	10.1%
1970 to 1979	2,230	22.2%	1,924	19.9%
1980 to 1989	1,783	17.7%	1,651	17.1%
1990 to 1999	1,892	18.8%	2,064	21.3%
2000 to 2009	1,405	14.0%	1,746	18.1%
2010 or Later			263	2.7%
<b>Total</b>	<b>10,066</b>	<b>100.0%</b>	<b>9,672</b>	<b>100.0%</b>

The distribution of unit types by race are shown in Table IV.26. An estimated 61.8 percent of white households occupy single-family homes, while 41.9 percent of black households occupy single-family homes. Some 21.2 percent of white households occupy apartments, while 23.0 percent of black households occupy apartments. An estimated 28.5 percent of Asian, and 100.0 percent of American Indian households occupy single-family homes.

**Table IV.26**  
**Distribution of Units in Structure by Race**  
 Starkville city  
 2016 Five-Year ACS Data

Unit Type	White	Black	American Indian	Asian	Native Hawaiian/ Pacific Islanders	Other	Two or More Races
Single-Family	61.8%	41.9%	100.0%	28.5%	%	0.0%	50.8%
Duplex	8.3%	18.6%	0.0%	2.0%	%	0.0%	15.4%
Tri- or Four-Plex	8.5%	12.2%	0.0%	3.1%	%	0.0%	0.0%
Apartment	21.2%	23.0%	0.0%	66.4%	%	0.0%	33.8%
Mobile Home	0.2%	4.3%	0.0%	0.0%	%	100.0%	0.0%
Boat, RV, Van, Etc.	0.0%	0.0%	0.0%	0.0%	%	0.0%	0.0%
<b>Total</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

The disposition of vacant housing units in 2000 and 2010 are shown in Table IV.27. An estimated 60.3 percent of vacant units were for rent in 2010, a 45.8 percent change since 2000. In addition, some 7.3 percent of vacant units were for sale, a change of 11.6 percent between 2000 and 2010. "Other" vacant units represented 10.7 percent of vacant units in 2010. This is a change of -15.0 percent since 2000. "Other" vacant units are not for sale or rent, or otherwise available to the marketplace. These units may be problematic if concentrated in certain areas, and may create a "blighting" effect.

**Table IV.27**  
**Disposition of Vacant Housing Units**  
 Starkville city  
 2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
For Rent	439	60.2%	640	60.3%	45.8%
For Sale	69	9.5%	77	7.3%	11.6%
Rented or Sold, Not Occupied	34	4.7%	57	5.4%	67.6%
For Seasonal, Recreational, or Occasional Use	49	6.7%	173	16.3%	253.1%
For Migrant Workers	5	0.7%	1	0.1%	-80.0%
Other Vacant	133	18.2%	113	10.7%	-15.0%
<b>Total</b>	<b>729</b>	<b>100.0%</b>	<b>1,061</b>	<b>100.0%</b>	<b>45.5%</b>

The disposition of vacant units between 2010 and 2016 are shown in Table IV.28. By 2016, for rent units accounted for 30.2 percent of vacant units, while for sale units accounted for 9.0 percent. "Other" vacant units accounted for 19.9 percent of vacant units, representing a total of 517 "other" vacant units.

**Table IV.28**  
**Disposition of Vacant Housing Units**  
 Starkville city  
 2010 Census & 2016 Five-Year ACS Data

Disposition	2010 Census		2016 Five-Year ACS	
	Units	% of Total	Units	% of Total
For Rent	640	60.3%	784	30.2%
For Sale	77	7.3%	235	9.0%
Rented Not Occupied	19	1.8%	264	10.2%
Sold Not Occupied	38	3.6%	0	0.0%
For Seasonal, Recreational, or Occasional Use	173	16.3%	800	30.8%
For Migrant Workers	1	0.1%	0	0.0%
Other Vacant	113	10.7%	517	19.9%
<b>Total</b>	<b>1,061</b>	<b>100.0%</b>	<b>2,600</b>	<b>100.0%</b>

## B. HOMELESSNESS AND VULNERABLE POPULATIONS

The following narrative describes the various at-need populations at the statewide level. These populations include persons that are homeless, persons recently released from incarceration, and foster care youth. Much of these data are only available at the statewide level, and are presented in the following narrative.

### Homelessness

As of the 2018 Point-in-Time count, Mississippi had a total homeless population of 1,352 persons, representing 1,013 individual households. Of these 1,352 persons, 404 were in emergency shelters, 327 were in transitional housing, and another 621 were unsheltered at the time of the count.

<b>Table IV.29</b> <b>Total Homeless Persons</b> State of Mississippi Point-in-Time Count Mississippi CoC				
Persons	Sheltered		Unsheltered	Total
	Emergency	Transitional		
Total Number of Persons	404	327	621	1,352
Total Number of Households	308	245	460	1,013

Persons in households with at least one adult and one child accounted for 328 of Mississippi's homeless population, representing 112 households. Of these people, 198 were children under the age of 18.

<b>Table IV.30</b> <b>Persons in Households with at least one Adult and one Child</b> State of Mississippi Point-in-Time Count Mississippi CoC				
Persons	Sheltered		Unsheltered	Total
	Emergency	Transitional		
Number of Persons (under age 18)	83	82	33	198
Number of Persons (18 - 24)	13	3	6	22
Number of Persons (over age 24)	47	42	19	108
Total Number of persons (Adults & Children)	143	127	58	328
Total Number of Households	50	45	17	112

At the time of the count, there were 8 persons in households with only children, 7 in emergency shelters and 1 unsheltered.

<b>Table IV.31</b> <b>Persons in Households with only Children</b> State of Mississippi Point-in-Time Count Mississippi CoC				
Persons	Sheltered		Unsheltered	Total
	Emergency	Transitional		
Total Number of children (under age 18)	7	0	1	8
Total Number of Households	7	0	1	8

Persons in households without children accounted for 1,016 of Mississippi's homeless, representing 893 households. 929 of these individuals were over the age of 24, and over half of that population, 506 persons, was unsheltered.

<b>Table IV.32</b> <b>Persons in Households without Children</b> State of Mississippi Point-in-Time Count Mississippi CoC				
Persons	Sheltered		Unsheltered	Total
	Emergency	Transitional		
Number of Persons (18 - 24)	27	4	6	43
Number of Persons (over age 24)	227	196	506	929
Total Number of persons (Adults)	254	200	562	1,016
Total Number of Households	251	200	442	893

<b>Table IV.33</b> <b>Demographic Summary by Race and Ethnicity</b> State of Mississippi Point-in-Time Count Mississippi CoC				
Race	Sheltered		Unsheltered	Total
	Emergency	Transitional		
Black or African-American	221	146	296	663
White	161	169	280	610
Asian	4	3	5	12
American Indian or Alaska Native	0	1	8	9
Native Hawaiian or Other Pacific Islander	0	0	5	5
Multiple Races	18	8	27	53
<b>Total Number of persons (Adults &amp; Children)</b>	<b>404</b>	<b>327</b>	<b>621</b>	<b>1,352</b>
Hispanic/Latino	13	12	18	43
Non-Hispanic / Non-Latino	391	315	603	1,309

At the time of the count, there were 19 homeless parenting youth, between the ages of 18 and 24. These 19 persons had a total of 20 children in their care.

<b>Table IV.34</b> <b>Homeless Parenting Youth</b> State of Mississippi Point-in-Time Count Mississippi CoC				
Persons	Sheltered		Unsheltered	Total
	Emergency	Transitional		
Parenting Youth Under 18	0	0	0	<b>0</b>
Parenting Youth 18-24	13	3	3	<b>19</b>
Total Number of Parenting Youth	<b>13</b>	<b>3</b>	<b>3</b>	<b>19</b>
Children of Parenting Youth	13	4	3	<b>20</b>

There were 87 unaccompanied youth at the time of the Point-in-Time count, 52 of whom were unsheltered, with 4 in transitional housing and the remaining 31 in emergency shelters. Only 1 unaccompanied youth under the age of 18 was unsheltered.

<b>Table IV.35</b> <b>Unaccompanied Youth</b> State of Mississippi Point-in-Time Count Mississippi CoC				
Persons	Sheltered		Unsheltered	Total
	Emergency	Transitional		
Unaccompanied Youth Under 18	7	0	1	<b>8</b>
Unaccompanied Youth 18-24	24	4	51	<b>79</b>
Total Number of Persons	<b>31</b>	<b>4</b>	<b>52</b>	<b>87</b>

During the Point-in-Time count, subpopulations of Mississippi's homeless population are identified. 218 of the homeless counted were severely mentally ill, with 141 of those persons unsheltered. 201 homeless persons suffered from chronic substance abuse. At the time of the count, there were 102 homeless veterans in Mississippi, only 37 of whom were in some form of shelter, another 65 homeless veterans were unsheltered. Only 3 homeless persons with HIV/AIDS were unsheltered, with 24 in transitional housing and 8 in emergency shelters. Of the 183 homeless victims of domestic violence, 122 were in emergency shelters, while 42 were in transitional housing and another 19 were unsheltered at the time of the count.

<b>Table IV.36</b> <b>Summary of all other populations reported</b> State of Mississippi Point-in-Time Count Mississippi CoC				
Persons (Adults and Children)	Sheltered		Unsheltered	Total
	Emergency	Transitional		
Severely Mentally Ill	50	27	141	<b>218</b>
Chronic Substance Abuse	48	35	118	<b>201</b>
Veterans	10	27	65	<b>102</b>
HIV/AIDS	8	24	3	<b>35</b>
Victims of Domestic Violence	122	42	19	<b>183</b>

Table IV.37, on the following page, shows the yearly counts of homeless veterans in Mississippi. Homelessness of veterans is down since 2012, with 2014 and 2018 being the only years of growth in the past seven years. Homeless veterans hit a low in 2017 at 57 individuals, but have nearly doubled since then to 102 in 2018. Despite this, the 2018 homeless veteran population in Mississippi is still under half of 2012.

<b>Table IV.37</b> <b>Homeless Veterans by Year</b> State of Mississippi Point-in-Time Count Mississippi CoC 2012-2018						
Year	Sheltered			Unsheltered	Total	Percent Change
	Emergency	Transitional	Total			
2012	.	.	71	173	244	.
2013	.	.	129	81	210	-13.93%
2014	64	157	221	58	279	32.86%
2015	33	54	87	119	206	-26.16%
2016	25	33	58	86	144	-30.10%
2017	11	28	39	18	57	-60.42%
2018	10	27	37	65	102	78.95%

### Persons Released from Incarceration

According to the Bureau of Justice Statistics, in 2016 Mississippi had 18,666 sentenced prisoners under the jurisdiction of state or federal correctional authorities. According to the Mississippi Department of Corrections, in 2018, 124 persons were released from prison in Oktibbeha County. This was a decrease of 33 persons compared to 2017, and a decrease of 18 persons since 2015.

<b>Table IV.38</b> <b>Prisoners under jurisdiction</b> <b>of state or federal correctional authorities</b> State of Mississippi BJS 2015-2016									
Persons	2015			2016			Percent Change		
	Total	Male	Female	Total	Male	Female	Total	Male	Female
Mississippi	18,911	17,595	1,316	19,192	17,823	1,369	1.5%	1.3%	4.0%
U.S. Total	1,526,603	1,415,112	111,491	1,506,757	1,395,141	111,616	-1.3%	-1.4%	0.1%

<b>Table IV.39</b> <b>Sentenced prisoners under jurisdiction</b> <b>of state or federal correctional authorities</b> State of Mississippi BJS 2015-2016									
Persons	2015			2016			Percent Change		
	Total	Male	Female	Total	Male	Female	Total	Male	Female
Mississippi	18,236	17,032	1,204	18,666	17,397	1,269	2.4%	2.1%	5.4%
U.S. Total	1,476,847	1,371,879	104,968	1,459,533	1,353,850	106,683	-1.2%	-1.3%	0.7%

In 2016 Mississippi released 7,080 of these prisoners, 6,443 of whom were released unconditionally. According to a 2015 study by the Mississippi Department of Corrections, there is a 35.9 percent recidivism rate for released prisoners. An estimated 17.6 percent of released prisoners in Mississippi will return to prison within the first year after release. Of the 7,080 prisoners released in 2016, it is expected that 2,541 will return to prison, 1,246 of them within the first year.

**Table IV.40**  
Admitted and released prisoners under jurisdiction  
of state or federal correctional authorities

State of Mississippi  
BJS 2015-2016

Persons	Admissions			Releases				
	2015 Total	2016 Total	% Change	2015 Total	2016 Total	% Change	2016 unconditional	2016 conditional
Mississippi	6,461	7,501	16.2%	6,104	7,080	16.0%	566	6,443
U.S. Total	608,318	606,000	-0.4%	641,027	626,024	-2.3%	168,752	426,755

### Transition-Age Youth in Foster Care

According to the Child Welfare Financing Survey, in 2015 Mississippi had 1,062 transition – age youth (16-21) in foster care. 81 youth were emancipated or aged-out of the foster care system in Mississippi in 2015.

**Table IV.41**  
Transition-age youth in foster care

State of Mississippi  
Child Welfare Financing Survey

Year	16 Yr Olds	17 Yr Olds	18 Yr Olds	19 Yr Olds	20-21 yr Olds	Total # of youth
2011	313	391	257	101	56	1,118
2012	331	287	298	121	66	1,103
2013	293	314	230	125	84	1,045
2014	357	325	238	97	76	1,083
2015	340	329	244	74	74	1,062

Of the 1,062 transition-age youth in foster care, 29 percent had been in foster care for 3 or more years, and 23 percent had exited and re-entered foster care. The median age of entry into foster care for these transition-age youth is 15 years old.



<b>Table IV.42</b> <b>Number of placements for transition-age youth</b> State of Mississippi Child Welfare Financing Survey			
<b>Number of Placements</b>	<b>1 or 2</b>	<b>3 or 4</b>	<b>5 or more</b>
Mississippi	36%	24%	41%
U.S.	45%	21%	33%

In the foster care system, a placement is considered any place the child has lived, excluding trial home visits. In Mississippi, transition-age youth tend to have more placements during their time in foster care than the U.S. average. 36 percent had only one or two placements, below the U.S. average of 45 percent, while 24 percent had three or four placements, and 41 percent of transition-age youth in Mississippi had 5 or more placements, which is above the U.S. average of 33 percent.

The National Youth in Transition Database issues a survey and follow up surveys to cohorts of youth at ages 17, 19, and 21 as they transition out of the foster care system.<sup>155</sup> In 2017 the survey found that by the age of 17, 17 percent of foster care youth had experienced homelessness at some point in their life. In addition, by the age of 19, 20 percent of those same youth reported experiencing homelessness at some point in the past two years. The survey also found that at age 17, 33 percent of transition-age youth had been incarcerated at some point in their life, and by age 19, 20 percent had been incarcerated in the past two years.

<sup>155</sup> <https://www.acf.hhs.gov/cb/research-data-technology/reporting-systems/nytd>

## C. SEGREGATION AND INTEGRATION

The “dissimilarity index” provides a quantitative measure of segregation in an area, based on the demographic composition of smaller geographic units within that area. One way of understanding the index is that it indicates how evenly two demographic groups are distributed throughout an area: if the composition of both groups in each geographic unit (e.g., Census tract) is the same as in the area as a whole (e.g., city), then the dissimilarity index score for that city will be 0. By contrast; and again using Census tracts as an example; if one population is clustered entirely within one Census tract, the dissimilarity index score for the city will be 1. The higher the dissimilarity index value, the higher the level of segregation in an area.

### *A Technical Note on the Dissimilarity Index Methodology*

The dissimilarity indices included in this study were calculated from data provided by the Census Bureau according to the following formula:

$$D_j^{WB} = 100 * \frac{1}{2} \sum_{i=1}^N \left| \frac{W_i}{W_j} - \frac{B_i}{B_j} \right|$$

Where  $i$  indexes a geographic unit,  $j$  is the  $j$ th jurisdiction,  $W$  is group one and  $B$  is group two, and  $N$  is the number of geographic units, starting with  $i$ , in jurisdiction  $j$ .<sup>156</sup>

This is the formula that HUD uses to calculate dissimilarity index values. In most respects (including the use of tract-level data available through the Brown Longitudinal Tract Database), the methodology employed in this study exactly duplicates HUD’s methodology for calculating the index of dissimilarity.

The principle exception was the decision to use Census tract-level data to calculate dissimilarity index values through 2010. While HUD uses tract level data in 1990 and 2000, HUD uses block group-level data in 2010. The decision to use tract-level data in all years included in this study was motivated by the fact that the dissimilarity index is sensitive to the geographic base unit from which it is calculated. Concretely, use of smaller geographic units produces dissimilarity index values that tend to be higher than those calculated from larger geographic units.<sup>157</sup>

As a general rule, HUD considers the thresholds appearing in Table IV.42 to indicate low, moderate, and high levels of segregation:

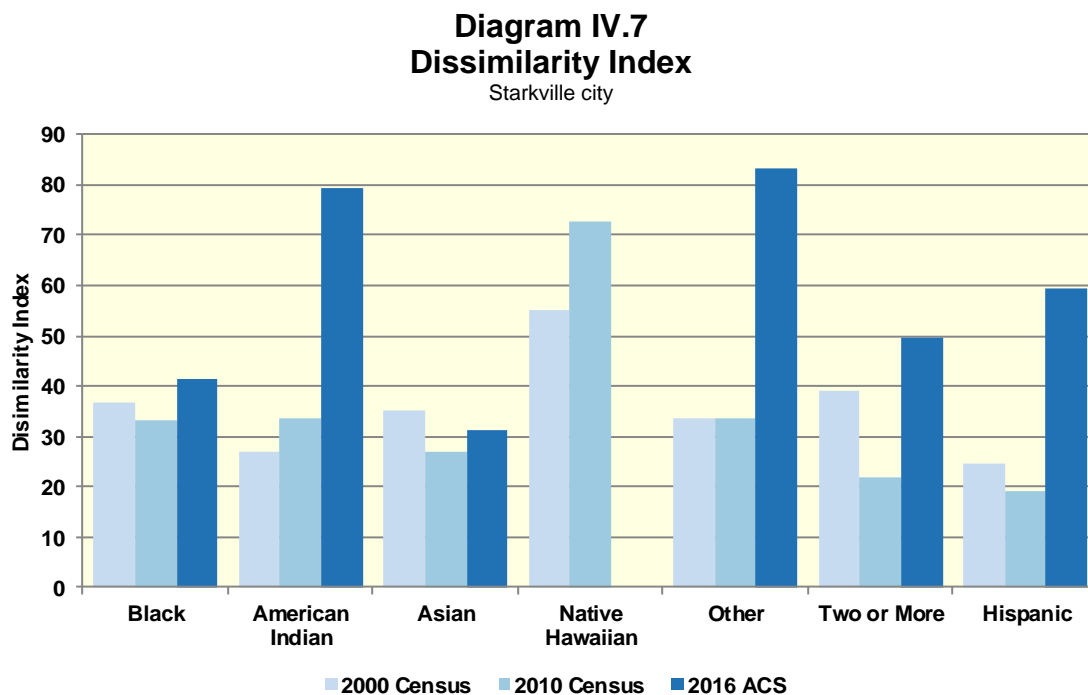
<sup>156</sup> Affirmatively Furthering Fair Housing Data Documentation. HUD. December 2015.

<sup>157</sup> Wong, David S. “Spatial Decomposition of Segregation Indices: A Framework Toward Measuring Segregation at Multiple Levels.” *Geographical Analyses*, 35:3. The Ohio State University. July 2003. P. 179.

Table IV.43 Interpreting the dissimilarity index		
Measure	Values	Description
Dissimilarity Index [range 0-100]	<40	Low Segregation
	40-54	Moderate Segregation
	>55	High Segregation

### Segregation Levels

Diagram IV.7 shows the dissimilarity index by racial type in 2000, 2010, and 2016. Any racial or ethnic group with a dissimilarity index rating between 40 and 54 has a moderate level of segregation. Any racial or ethnic group with a dissimilarity index rating 55 or above has a high level of segregation.



## D. RACIALLY AND ETHNICALLY CONCENTRATED AREAS OF POVERTY

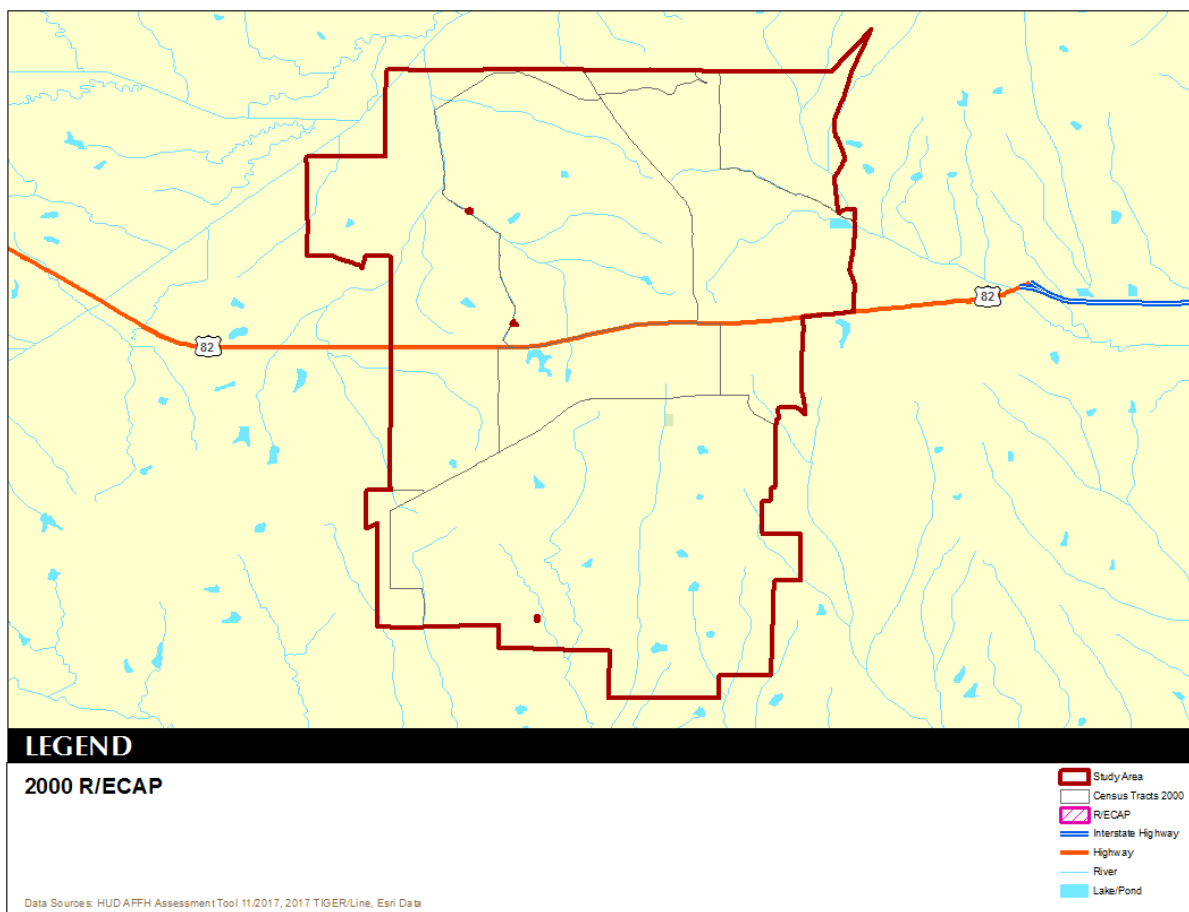
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Racially or ethnically concentrated areas of poverty (R/ECAPs) are Census tracts with relatively high concentrations of non-white residents living in poverty. Formally, an area is designated an R/ECAP if two conditions are satisfied: first, the non-white population, whether Hispanic or non-Hispanic, must account for at least 50 percent of the Census tract population. Second, the poverty rate in that Census must exceed a certain threshold, at 40 percent.

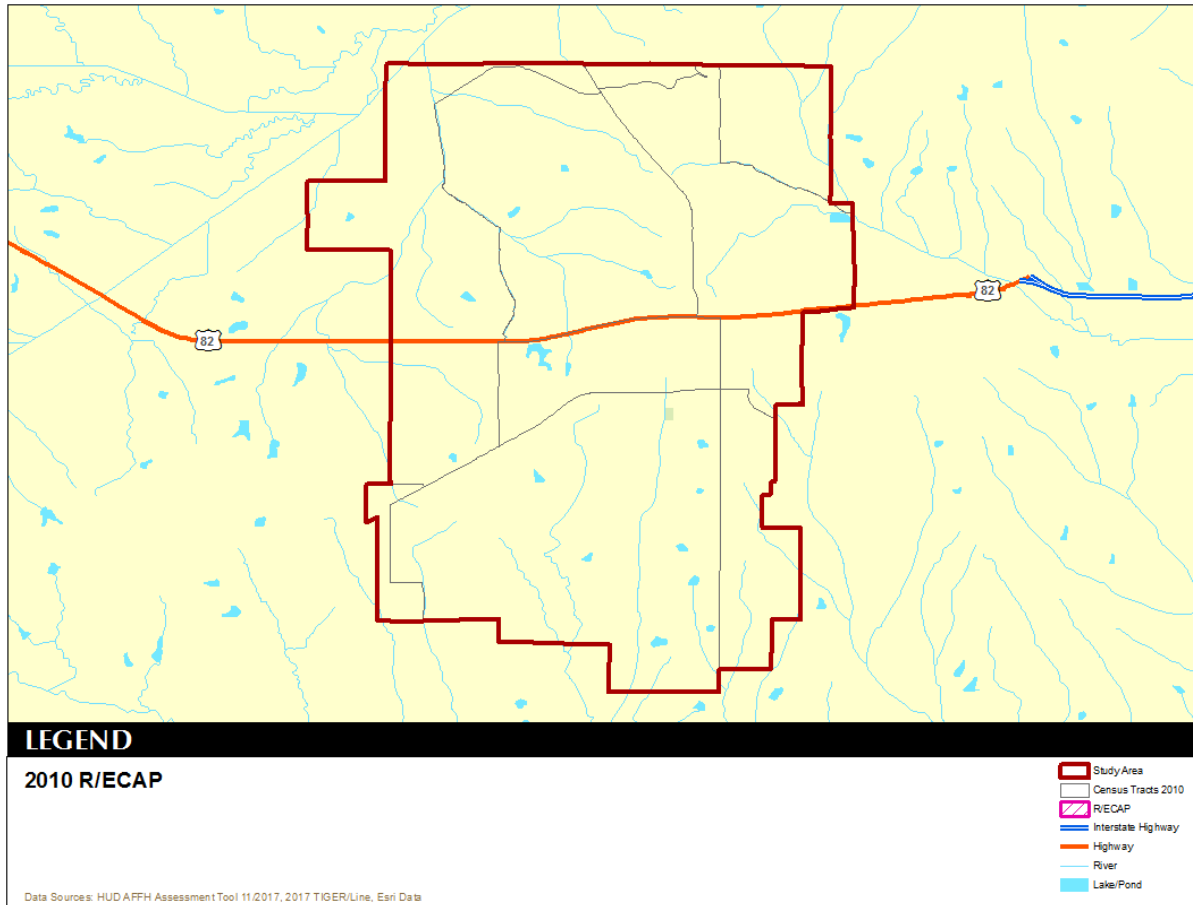
### ***R/ECAPs over Time***

The change in R/CAPs in Starkville city are shown in the following three maps. Map IV.1 shows the R/CAPs in 2000. Map IV.2 shows the R/ECAPs in Starkville city in 2010, and Map IV.3 shows the R/CAPs in 2016.

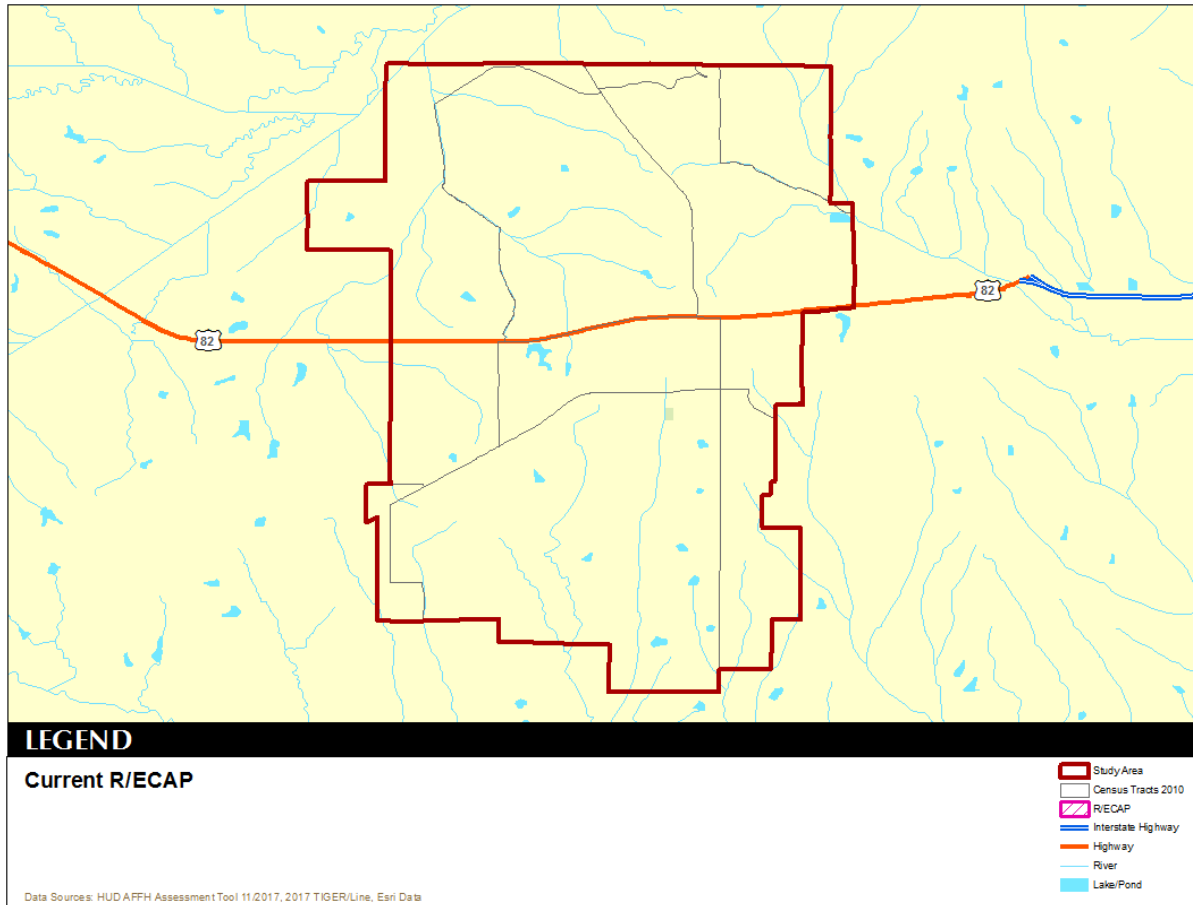
**Map IV.1**  
**R/ECAP 2000 Census**  
 Starkville city  
 AFFH Data



**Map IV.2**  
**R/ECAP 2010 Census**  
 Starkville city  
 AFFH Data



**Map IV.3**  
**R/ECAP 2016 ACS**  
 Starkville city  
 AFFH Data



## E. DISPARITIES IN ACCESS TO OPPORTUNITY

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Areas of opportunity are physical places, areas within communities that provide things one needs to thrive, including quality employment, well performing schools, affordable housing, efficient public transportation, safe streets, essential services, adequate parks, and full-service grocery stores. Areas lacking opportunity, then, have the opposite of these attributes. Disparities in access to opportunity inspects whether a select group, or certain groups, have lower or higher levels of access to these community assets. HUD expresses several of these community assets through the use of an index value, with 100 representing total access by all members of the community, and zero representing no access.

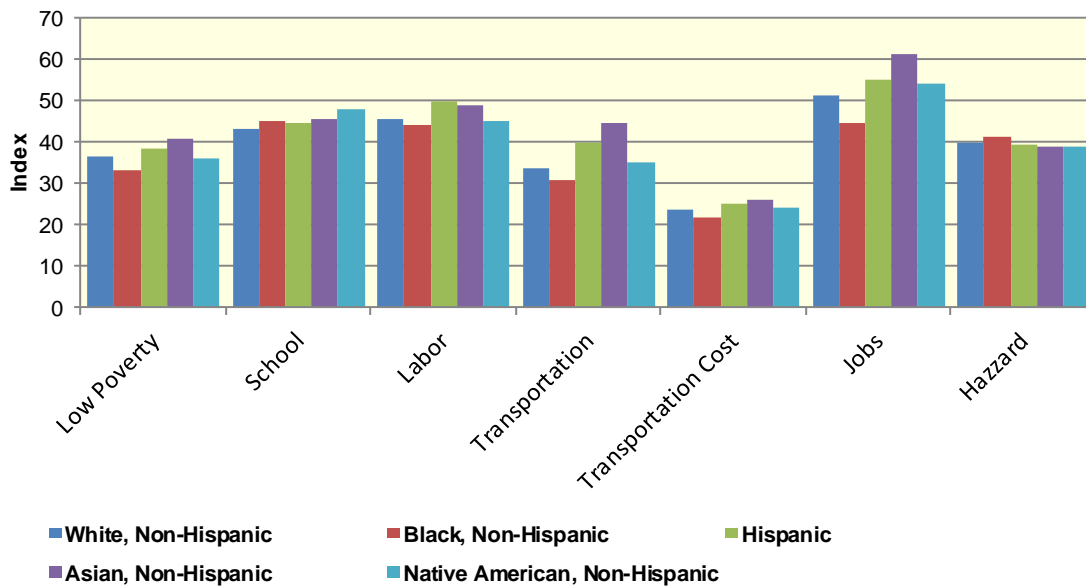
The HUD opportunity indices are access to Low Poverty areas; access to School Proficiency; characterization of the Labor Market Engagement; residence in relation to Jobs Proximity; Low Transportation Costs; Transit Trips Index; and a characterization of where you live by an Environmental Health indicator. For each of these a more formal definition is as follows:

- Low Poverty – A measure of the degree of poverty in a neighborhood, at the Census Tract level.
- School Proficiency - School-level data on the performance of 4<sup>th</sup> grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing schools.
- Jobs Proximity - Quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a Core Based Statistical Area (CBSA)
- Labor Market Engagement - Provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood
- Low Transportation Cost – Estimates of transportation costs for a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters for the region
- Transit Trips - Trips taken by a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters
- Environmental Health - summarizes potential exposure to harmful toxins at a neighborhood level

All the indices are presented in Diagram IV.8. The disparities in access to opportunity are shown in the differences between the various racial and ethnic groups in the diagram. For example, if white households have a distinctly higher index rating than black households then black households have a disproportionate access.



**Diagram IV.8**  
**Access to Opportunity**  
 Oktibbeha County

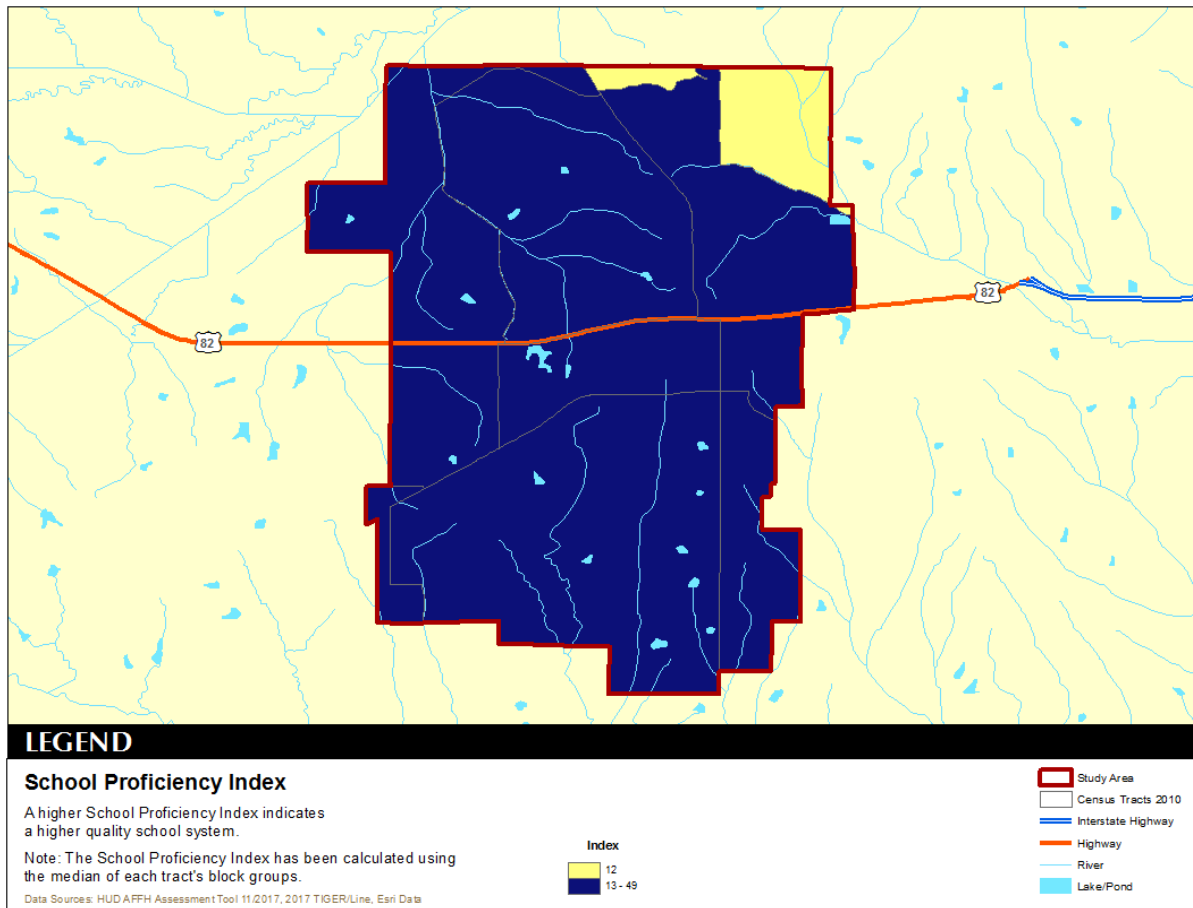


## EDUCATIONAL OPPORTUNITIES

The School Proficiency Index measures the proficiency of elementary schools in the attendance area (where this information is available) of individuals sharing a protected characteristic or the proficiency of elementary schools within 1.5 miles of individuals with a protected characteristic where attendance boundary data are not available. The values for the School Proficiency Index are determined by the performance of 4th grade students on state exams.

Map IV.4 shows the school proficiency index ratings in Starkville city. The darkest areas in Map IV.4 show the highest school proficiency areas, while the lightest yellow shows the lowest areas of school proficiency.

**Map IV.4**  
**School Proficiency Index**  
 Starkville city  
 AFFH Data



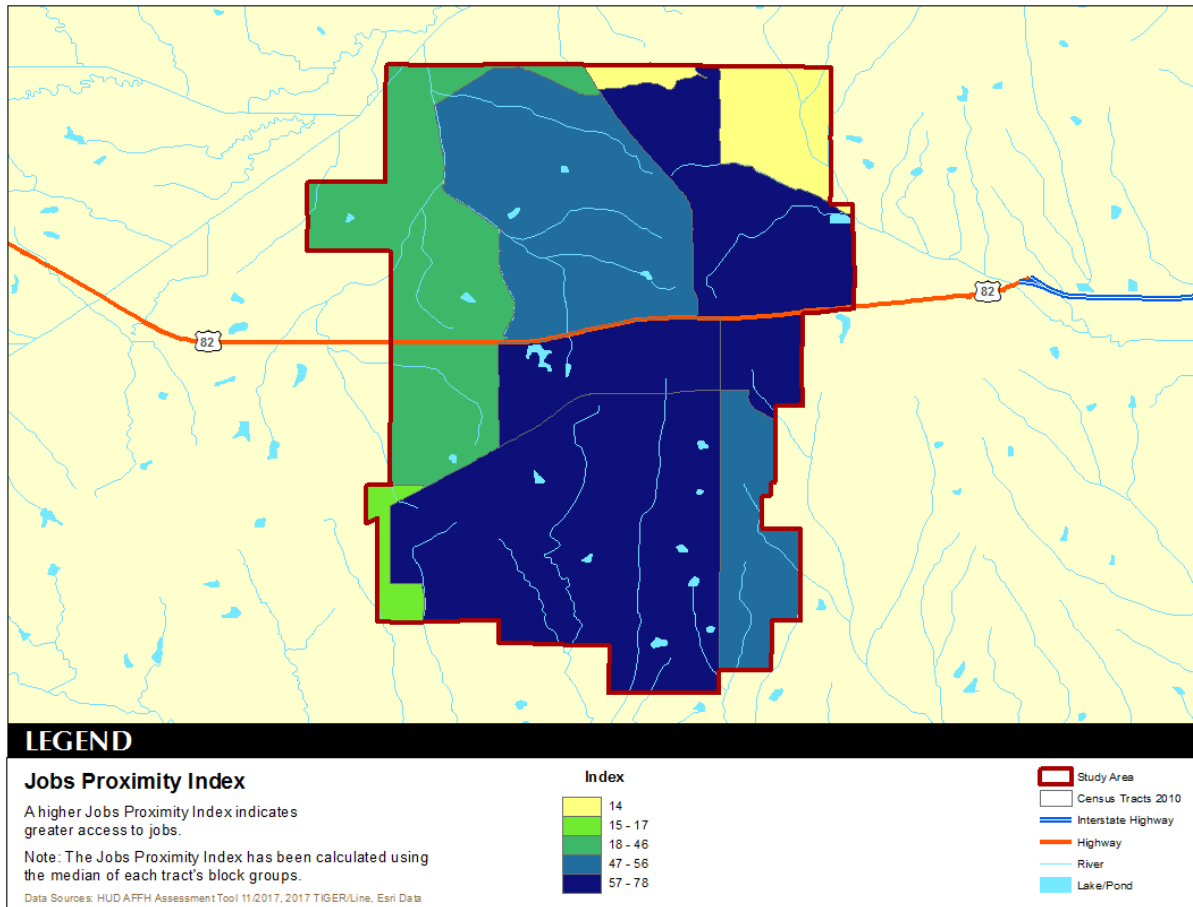
## EMPLOYMENT

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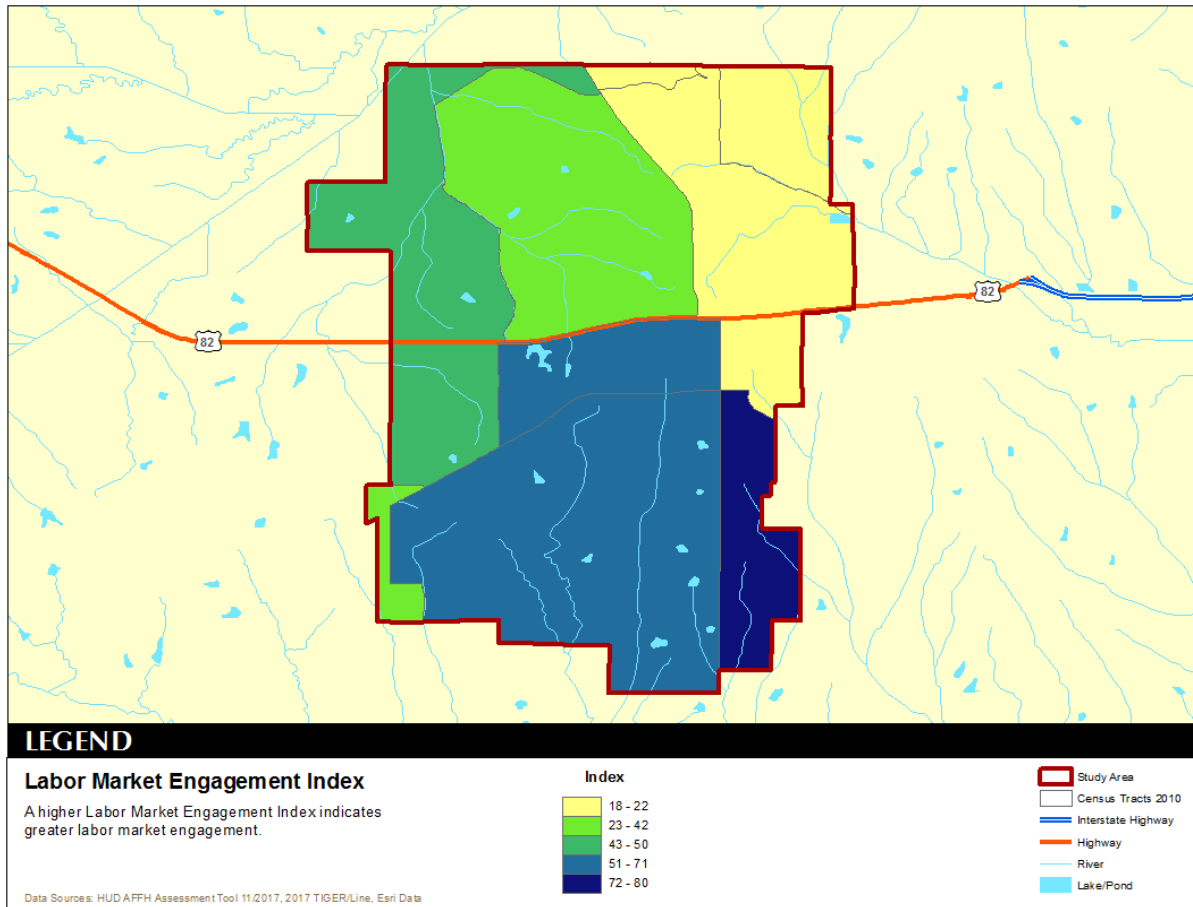
The Jobs Proximity Index measures the physical distances between place of residence and jobs by race/ethnicity, and is shown in Map IV.5.

The Labor Market Engagement Index provides a measure of unemployment rate, labor-force participation rate, and percent of the population ages 25 and above with at least a bachelor's degree, by neighborhood. Map IV.6 shows the labor market engagement for the area.

**Map IV.5**  
**Job Proximity Index**  
 Starkville city  
 AFFH Data



**Map IV.6**  
**Labor Engagement Index**  
 Starkville city  
 AFFH Data



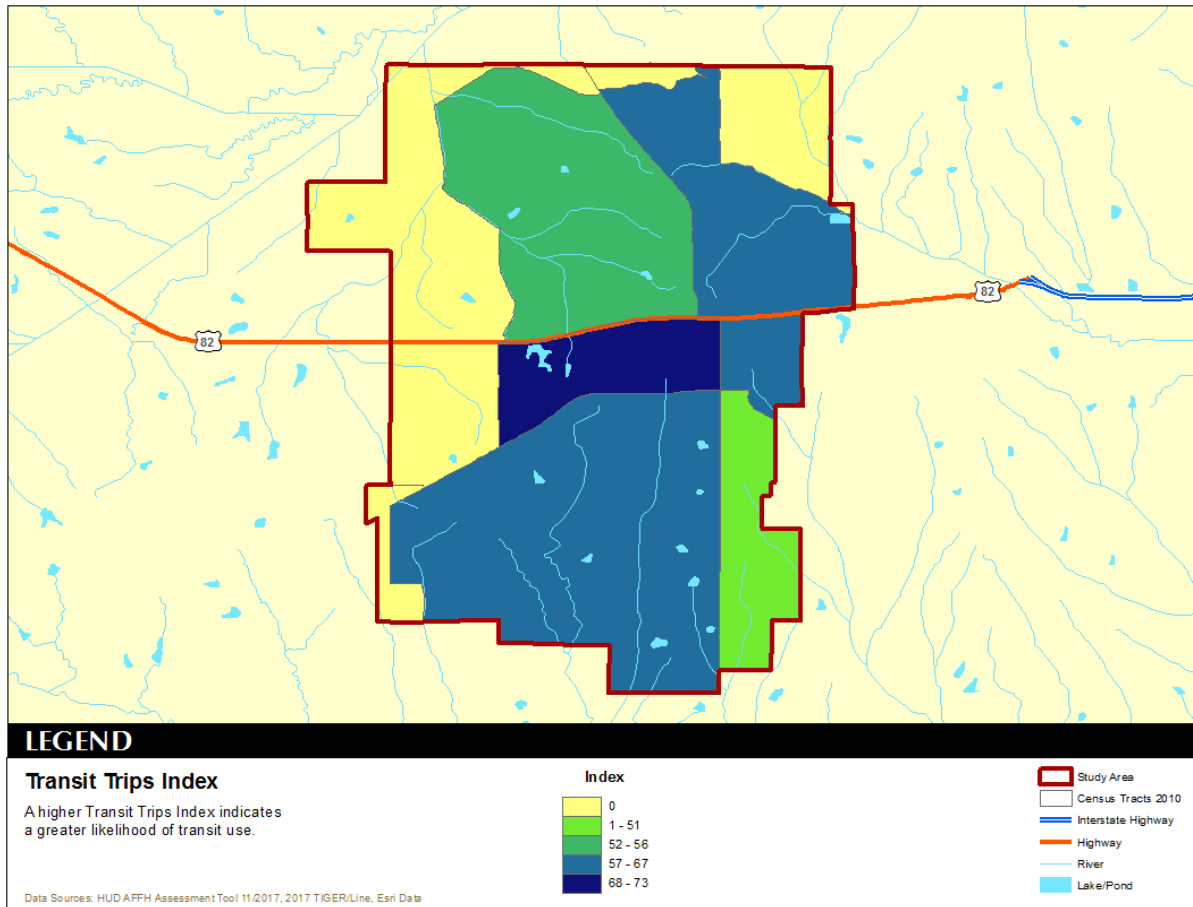
## TRANSPORTATION

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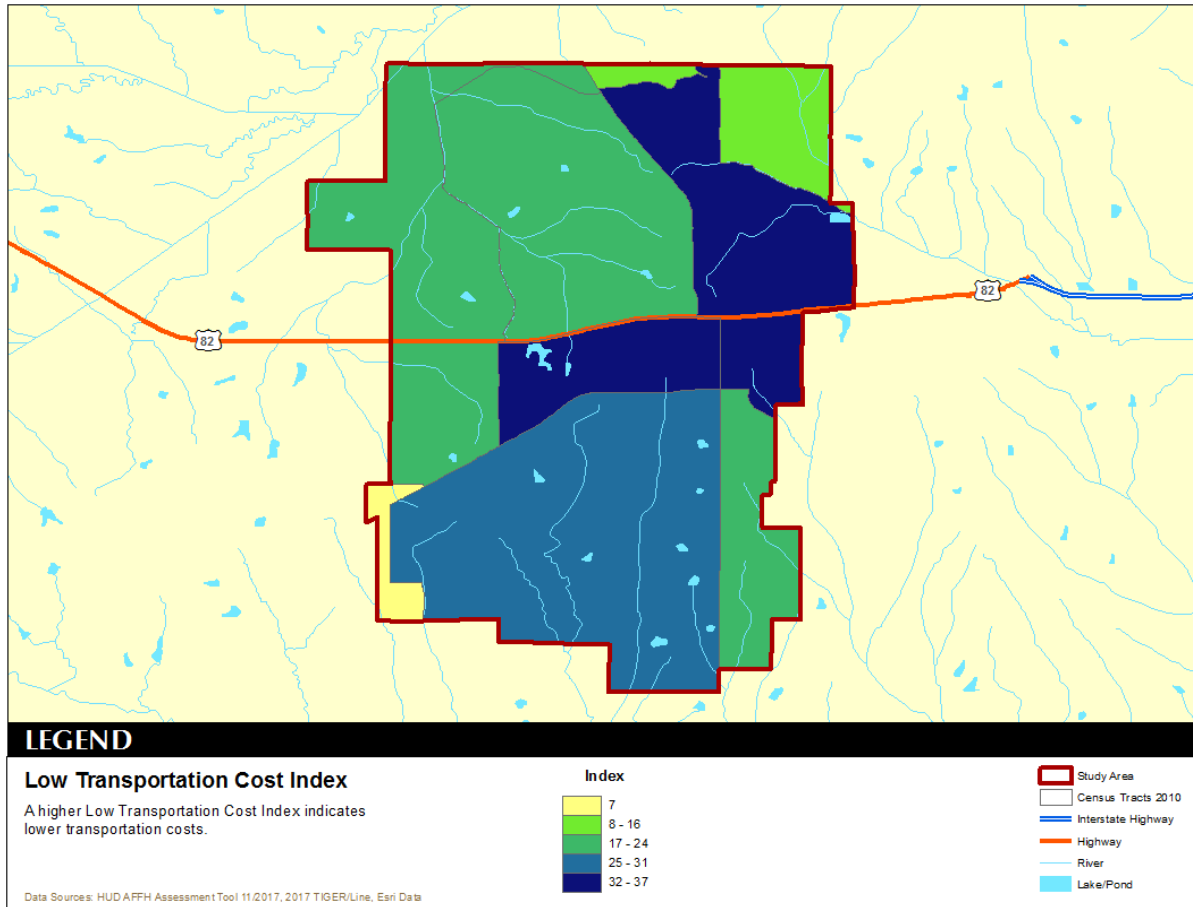
The Transportation Trip Index measures proximity to public transportation by neighborhood. There was little difference in index rating across racial and ethnic groups. The Transit Trips Index measures how often low-income families in a neighborhood use public transportation. The Transit Trips Indices are shown in Map IV.7.

The Low Transportation Cost Index measures cost of transport and proximity to public transportation by neighborhood. Transportation Costs indices are shown in Map IV.8.

**Map IV.7**  
**Transit Trips Index**  
 Starkville city  
 AFFH Data



**Map IV.8**  
**Transportation Cost Index**  
 Starkville city  
 AFFH Data





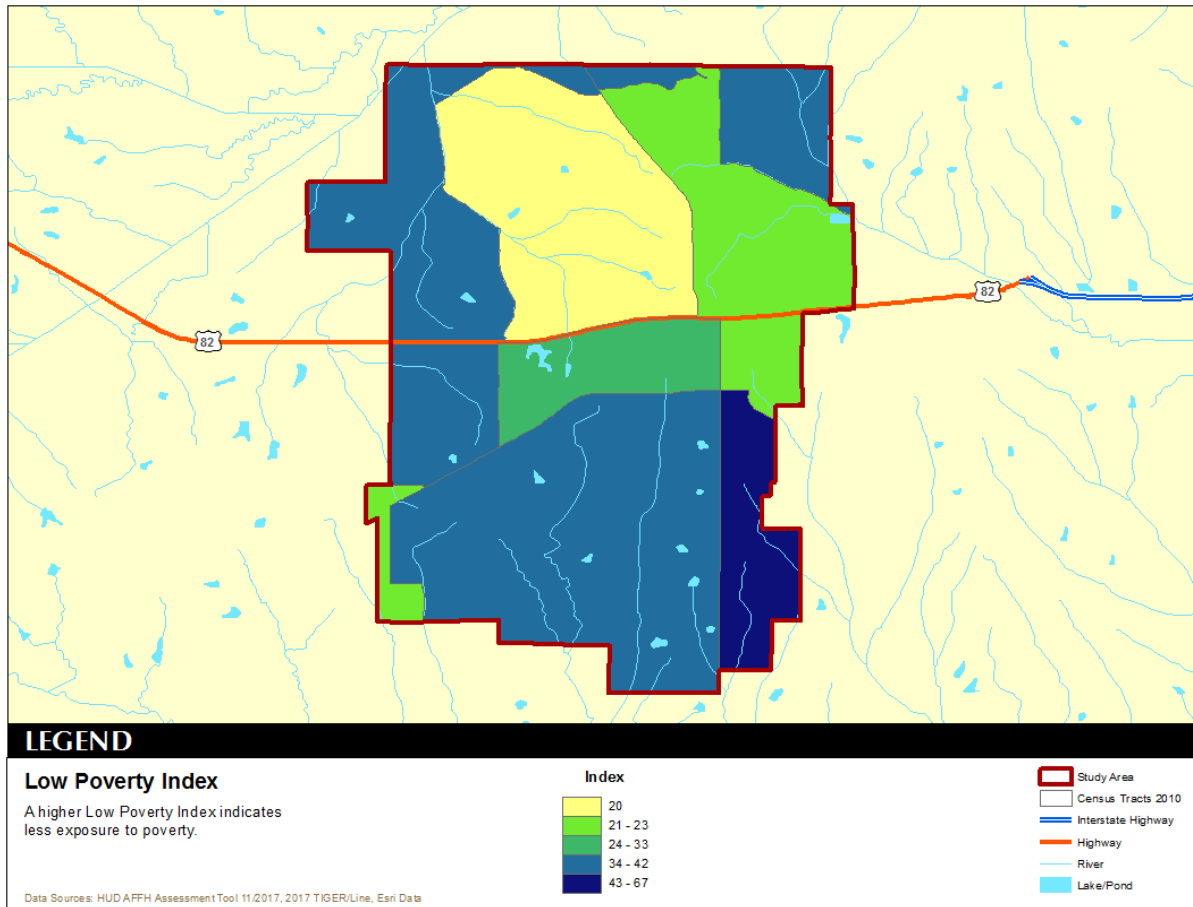
## LOW POVERTY EXPOSURE OPPORTUNITIES

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The Low Poverty Index uses rates of family poverty by household (based on the federal poverty line) to measure exposure to poverty by neighborhood. A higher score is more desirable, generally indicating less exposure to poverty at the neighborhood level.

The low poverty index is shown in Map IV.9. The Low Poverty Index uses rates of family poverty by household (based on the federal poverty line) to measure exposure to poverty by neighborhood. A higher score is more desirable, generally indicating less exposure to poverty at the neighborhood level. A higher index represents a lower level of exposure to poverty.

**Map IV.9**  
**Low Poverty Index**  
 Starkville city  
 AFFH Data

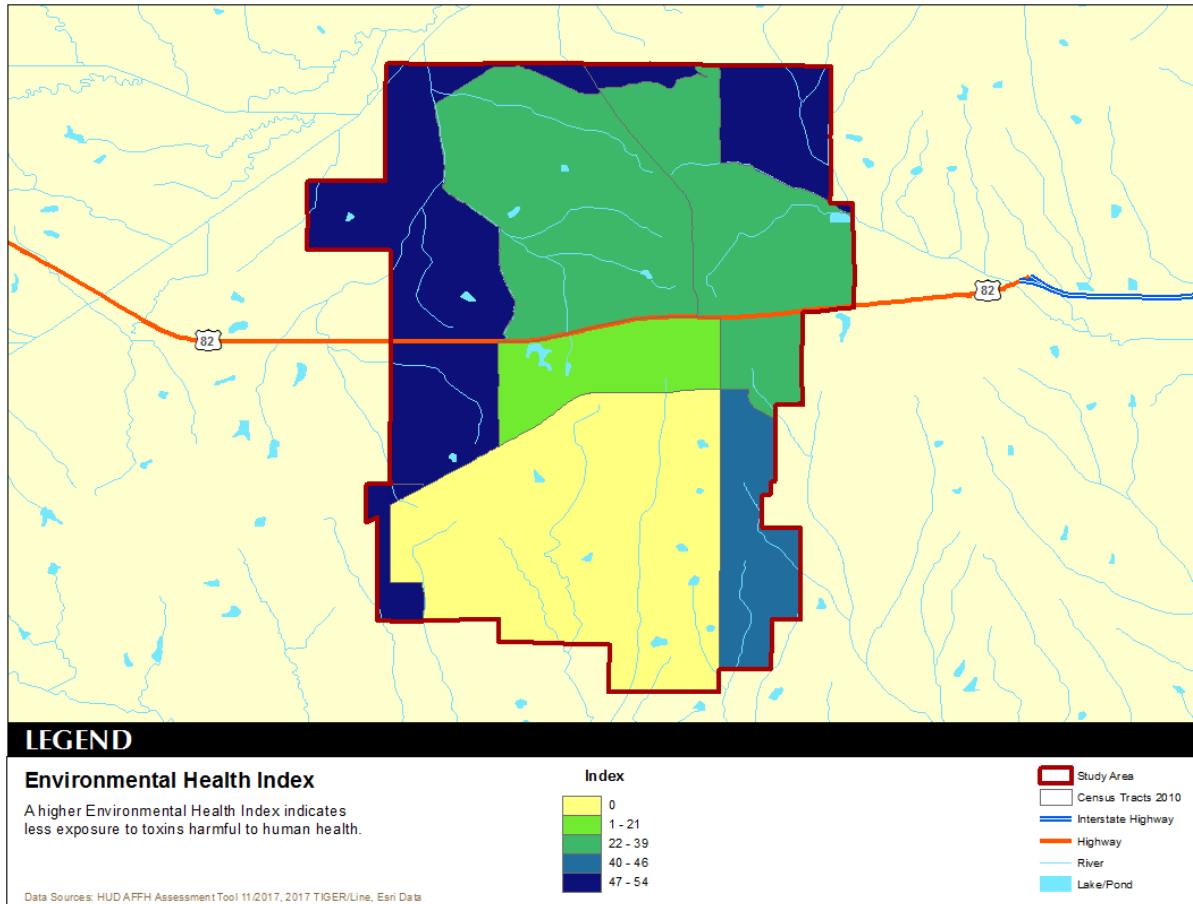


## **ACCESS TO ENVIRONMENTALLY HEALTHY NEIGHBORHOODS**

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The Environmental Health Index measures exposure based on EPA estimates of air quality carcinogenic, respiratory and neurological toxins by neighborhood. The Environmental Health Index is shown in Map IV.10.

**Map IV.10**  
**Environmental Health Index**  
 Starkville city  
 AFFH Data



## F. DISPROPORTIONATE HOUSING NEEDS

Households are classified as having housing problems if they face overcrowding, incomplete plumbing or kitchen facilities, or 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. Households with overcrowding are shown in Table IV.43. In 2016, an estimated 0.5 percent of households were overcrowded, and an additional 0.2 percent were severely overcrowded.

**Table IV.44**  
**Overcrowding and Severe Overcrowding**  
Starkville city  
2010 & 2016 Five-Year ACS Data

Data Source	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
Owner							
2010 Five-Year ACS	3,853	98.6%	55	1.4%	0	0.0%	3,908
2016 Five-Year ACS	4,078	100.0%	0	0.0%	0	0.0%	4,078
Renter							
2010 Five-Year ACS	6,037	98.0%	0	0.0%	121	2.0%	6,158
2016 Five-Year ACS	5,525	98.8%	52	0.9%	17	0.3%	5,594
Total							
2010 Five-Year ACS	9,890	98.3%	55	0.5%	121	1.2%	10,066
2016 Five-Year ACS	9,603	99.3%	52	0.5%	17	0.2%	9,672

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.

There were a total of 24 households with incomplete plumbing facilities in 2016, representing 0.2 percent of households in Starkville city. This is compared to 0.3 percent of households lacking complete plumbing facilities in 2000.

**Table IV.45**  
**Households with Incomplete Plumbing Facilities**  
Starkville city  
2000 Census SF3 & 2016 Five-Year ACS Data

Households	2000 Census	2010 Five-Year ACS	2016 Five-Year ACS
With Complete Plumbing Facilities	9,459	10,066	9,648
Lacking Complete Plumbing Facilities	27	0	24
<b>Total Households</b>	<b>9,486</b>	<b>10,066</b>	<b>9,672</b>
<b>Percent Lacking</b>	<b>0.3%</b>	<b>0.0%</b>	<b>0.2%</b>

There were 24 households lacking complete kitchen facilities in 2016, compared to 60 households in 2000. This was a change from 0.6 percent of households in 2000 to 0.2 percent in 2016.

<b>Table IV.46</b> <b>Households with Incomplete Kitchen Facilities</b> Starkville city 2000 Census SF3 & 2016 Five-Year ACS Data			
Households	2000 Census	2010 Five-Year ACS	2016 Five-Year ACS
With Complete Kitchen Facilities	9,426	10,031	9,648
Lacking Complete Kitchen Facilities	60	35	24
<b>Total Households</b>	<b>9,486</b>	<b>10,066</b>	<b>9,672</b>
<b>Percent Lacking</b>	<b>0.6%</b>	<b>0.3%</b>	<b>0.2%</b>

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.

In Starkville city, 18.2 percent of households had a cost burden and 22.7 percent had a severe cost burden. Some 22.0 percent of renters were cost burdened, and 34.4 percent were severely cost burdened. Owner-occupied households without a mortgage had a cost burden rate of 11.7 percent and a severe cost burden rate of 2.6 percent. Owner occupied households with a mortgage had a cost burden rate of 13.8 percent, and severe cost burden at 9.6 percent.

Table IV.47 Cost Burden and Severe Cost Burden by Tenure Starkville city 2010 Five-Year ACS & 2016 Five-Year ACS Data									
Data Source	Less Than 30%		31%-50%		Above 50%		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage									
2010 Five-Year ACS	1,899	72.5%	406	15.5%	287	11.0%	27	1.0%	2,619
2016 Five-Year ACS	1,709	74.9%	315	13.8%	220	9.6%	38	1.7%	2,282
Owner Without a Mortgage									
2010 Five-Year ACS	1,137	88.2%	85	6.6%	16	1.2%	51	4.0%	1,289
2016 Five-Year ACS	1,499	83.5%	210	11.7%	47	2.6%	40	2.2%	1,796
Renter									
2016 Five-Year ACS	2,194	35.6%	1,096	17.8%	2,320	37.7%	548	8.9%	6,158
2016 Five-Year ACS	1,912	34.2%	1,233	22.0%	1,926	34.4%	523	9.3%	5,594
Total									
2000 Census	5,230	52.0%	1,587	15.8%	2,623	26.1%	626	6.2%	10,066
2016 Five-Year ACS	5,120	52.9%	1,758	18.2%	2,193	22.7%	601	6.2%	9,672

## Housing Problems by Income

Table IV.48 shows the HUD calculated Median Family Income (MFI) for a family of four for Oktibbeha County. As can be seen in 2017, the MFI was 57,700 dollars, which compared to 51,800 dollars for the State of Mississippi.

<b>Table IV.48</b> <b>Median Family Income</b> Oktibbeha County 2000–2017 HUD MFI		
<b>Year</b>	<b>MFI</b>	<b>State</b>
2000	42,200	38,100
2001	44,300	40,000
2002	45,200	40,200
2003	41,100	40,700
2004	41,100	40,700
2005	41,100	40,700
2006	40,300	40,700
2007	42,300	43,200
2008	43,900	45,000
2009	46,200	46,800
2010	46,600	47,300
2011	49,600	48,000
2012	50,200	48,700
2013	53,700	48,300
2014	50,400	48,200
2015	54,100	48,300
2016	56,700	48,900
2017	57,700	51,800

Table IV.49 shows Comprehensive Housing Affordability Strategy (CHAS) data for housing problems by tenure and income. As can be seen there are a total of 450 owner-occupied and 1145 renter-occupied households with a cost burden of greater than 30 percent and less than 50 percent. An additional 315 owner-occupied 1740 renter-occupied households had a cost burden greater than 50 percent of income. Overall there are 5450 households without a housing problem.

**Table IV.49**  
**Housing Problems by Income and Tenure**

Starkville city  
 2010–2014 HUD CHAS Data

Housing Problem	Less Than 30% MFI	30% - 50% MFI	50% - 80% MFI	80% - 100% MFI	Greater than 100% MFI	Total
<b>Owner-Occupied</b>						
Lacking complete plumbing or kitchen facilities	0	0	0	0	10	10
Severely Overcrowded with > 1.51 people per room (and complete kitchen and plumbing)	0	0	0	0	0	0
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	0	0	0	0	0	0
Housing cost burden greater than 50% of income (and none of the above problems)	175	120	20	0	0	315
Housing cost burden greater than 30% but less than 50% of income (and none of the above problems)	40	60	105	110	135	450
Zero/negative income (and none of the above problems)	70	0	0	0	0	70
Has none of the 4 housing problems	40	80	265	200	2680	3265
<b>Total</b>	<b>325</b>	<b>260</b>	<b>390</b>	<b>310</b>	<b>2825</b>	<b>4110</b>
<b>Renter-Occupied</b>						
Lacking complete plumbing or kitchen facilities	0	0	0	0	0	0
Severely Overcrowded with > 1.51 people per room (and complete kitchen and plumbing)	30	0	0	20	20	70
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	20	4	35	0	0	59
Housing cost burden greater than 50% of income (and none of the above problems)	1370	320	50	0	0	1740
Housing cost burden greater than 30% but less than 50% of income (and none of the above problems)	265	255	540	85	0	1145
Zero/negative income (and none of the above problems)	385	0	0	0	0	385
Has none of the 4 housing problems	205	220	230	605	925	2185
<b>Total</b>	<b>2275</b>	<b>799</b>	<b>855</b>	<b>710</b>	<b>945</b>	<b>5584</b>
<b>Total</b>						
Lacking complete plumbing or kitchen facilities	0	0	0	0	10	10
Severely Overcrowded with > 1.51 people per room (and complete kitchen and plumbing)	30	0	0	20	20	70
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	20	4	35	0	0	59
Housing cost burden greater than 50% of income (and none of the above problems)	1545	440	70	0	0	2055
Housing cost burden greater than 30% but less than 50% of income (and none of the above problems)	305	315	645	195	135	1595
Zero/negative income (and none of the above problems)	455	0	0	0	0	455
Has none of the 4 housing problems	245	300	495	805	3605	5450
<b>Total</b>	<b>2600</b>	<b>1059</b>	<b>1245</b>	<b>1020</b>	<b>3770</b>	<b>9694</b>



## ACCESS TO MORTGAGE FINANCE SERVICES

Congress enacted the Home Mortgage Disclosure Act (HMDA) in 1975, permanently authorizing the law in 1988<sup>158</sup>. The Act requires both depository and non-depository lenders to collect and publicly disclose information about housing-related applications and loans. Under the HMDA, financial institutions are required to report the race, ethnicity, sex, loan amount, and income of mortgage applicants and borrowers by Census tract. Institutions must meet a set of reporting criteria. For depository institutions, these are as follows:

1. The institution must be a bank, credit union, or savings association;
2. The total assets must exceed the coverage threshold;<sup>159</sup>
3. The institution must have had a home or branch office in a Metropolitan Statistical Area (MSA);
4. The institution must have originated or refinanced at least one home purchase loan secured by a first lien on a one- to four-family dwelling;
5. The institution must be federally insured or regulated; and
6. The mortgage loan must have been insured, guaranteed, or supplemented by a federal agency or intended for sale to Fannie Mae or Freddie Mac.

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

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

In addition to reporting race and ethnicity data for loan applicants, the HMDA reporting requirements were modified 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 purchases when contrasted with comparable treasury instruments or five percentage points for refinance loans.

For the purposes of this analysis, these flagged originations will be termed predatory, or at least predatory in nature. Overall, the data contained within the HMDA reporting guidelines represent the best and most complete set of information on home loan applications. This report

<sup>158</sup> Prior to that year, Congress had to periodically reauthorize the law.

<sup>159</sup> 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.

includes HMDA data from 2008 through 2016, the most recent year for which these data are available.

Table IV.50 shows the purpose of loan by year for Starkville city from 2008 to 2017. As seen therein, there were over 7,537 loans during this time period, of these some 3,422 were for home purchases. In 2017, there were 593 loans, of which 353 were for home purchases.

<b>Table IV.50</b> <b>Purpose of Loan by Year</b> Starkville city 2008–2017 HMDA Data											
Purpose	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
Home Purchase	427	384	310	279	334	329	295	344	367	353	3,422
Home Improvement	51	54	54	21	50	46	34	33	28	56	427
Refinancing	409	624	441	409	535	432	198	218	238	184	3,688
<b>Total</b>	<b>887</b>	<b>1,062</b>	<b>805</b>	<b>709</b>	<b>919</b>	<b>807</b>	<b>527</b>	<b>595</b>	<b>633</b>	<b>593</b>	<b>7,537</b>

Table IV.51 shows the occupancy status for loan applicants. A vast majority of applicants were or owner-occupied units, accounting for 5,685 loans between 2008 and 2017, and for 411 in 2017 alone.

<b>Table IV.51</b> <b>Occupancy Status for Applications</b> Starkville city 2008–2017 HMDA Data											
Status	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
Owner-Occupied	642	862	620	550	706	609	376	440	469	411	5,685
Not Owner-Occupied	242	190	185	159	213	198	151	155	164	182	1,839
Not Applicable	3.0	10.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	13
<b>Total</b>	<b>887</b>	<b>1,062</b>	<b>805</b>	<b>709</b>	<b>919</b>	<b>807</b>	<b>527</b>	<b>595</b>	<b>633</b>	<b>593</b>	<b>7,537</b>

Owner-occupied home purchase loan applications by loan types are shown in Table IV.52. Between 2008 and 2017, some 1,520 home loan purchases were conventional loans, 496 were FHA insured, and 108 were VA Guaranteed.

**Table IV.52**  
**Owner-Occupied Home Purchase Loan Applications by Loan Type**  
 Starkville city  
 2008–2017 HMDA Data

Loan Type	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
Conventional	215	160	112	84	126	154	146	163	178	182	1,520
FHA - Insured	39	73	62	77	58	40	22	35	51	39	496
VA - Guaranteed	10	9	6	15	7	18	12	15	10	6	108
Rural Housing Service or Farm Service Agency	51	59	42	41	63	40	34	44	25	18	417
<b>Total</b>	<b>315</b>	<b>301</b>	<b>222</b>	<b>217</b>	<b>254</b>	<b>252</b>	<b>214</b>	<b>257</b>	<b>264</b>	<b>264</b>	<b>2,541</b>

## Denial Rates

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

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

As shown in Table IV.53, just over 1,612 home purchase loan applications were originated over the 2008-2017 period, and 165 were denied.

**Table IV.53**  
**Loan Applications by Action Taken**  
 Starkville city  
 2008–2017 HMDA Data

Action	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
Loan Originated	180	182	133	120	161	159	145	183	184	165	1,612
Application Approved but not Accepted	13	8.0	4.0	6.0	4.0	3.0	3.0	3.0	1.0	4.0	49
Application Denied	23	21	14	18	11	18	18	7	19	16	165
Application Withdrawn by Applicant	17	19	22	15	27	20	12	17	22	17	188
File Closed for Incompleteness	3.0	3.0	1.0	4.0	1.0	2.0	5.0	1.0	2.0	4.0	26
Loan Purchased by the Institution	79	68	48	54	50	50	31	46	36	39	501
Preapproval Request Denied	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Preapproval Approved but not Accepted	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total</b>	<b>315</b>	<b>301</b>	<b>222</b>	<b>217</b>	<b>254</b>	<b>252</b>	<b>214</b>	<b>257</b>	<b>264</b>	<b>245</b>	<b>2,541</b>

The most common reasons cited in the decision to deny one of these loan applications are shown in Table IV.54. Debt-to-income ratio accounted for 26 denials, credit history accounted for 29, and collateral accounted for 11.

**Table IV.54**  
**Loan Applications by Reason for Denial**  
 Starkville city  
 2008–2017 HMDA Data

Denial Reason	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
Debt-to-Income Ratio	4.0	3.0	3.0	3.0	1.0	0.0	4.0	0.0	6.0	2.0	26
Employment History	2.0	0.0	0.0	0.0	0.0	2.0	0.0	1.0	0.0	0.0	5.0
Credit History	4	7	3	1	5	0.0	3.0	0.0	4.0	2.0	29
Collateral	0.0	3.0	0.0	2.0	0.0	1.0	2.0	1.0	1.0	1.0	11
Insufficient Cash	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.0	2.0	3.0
Unverifiable Information	0.0	0.0	0.0	1.0	1.0	0.0	2.0	1.0	0.0	0.0	5.0
Credit Application Incomplete	1.0	1.0	0.0	0.0	0.0	0.0	1.0	1.0	4.0	5.0	13
Mortgage Insurance Denied	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Other	1.0	3.0	2.0	3.0	0.0	0.0	0.0	0.0	0.0	0.0	9
Missing	11	4.0	6	8.0	4.0	15	6	3	3	4	64
<b>Total</b>	<b>23</b>	<b>21</b>	<b>14</b>	<b>18</b>	<b>11</b>	<b>18</b>	<b>18</b>	<b>7</b>	<b>19</b>	<b>16</b>	<b>165</b>

Denial rates were observed to differ by race and ethnicity, as shown in Table IV.55. While white applicants had a denial rate of 7.4 percent over the period from 2008 through 2017, black applicants had a denial rate of 21.4 percent. As for ethnicity, Hispanic applicants had a higher denial rate than non-Hispanic applicants, at 8.5 percent versus 8.7 percent.

**Table IV.55**  
**Denial Rates by Race/Ethnicity of Applicant**  
 Starkville city  
 2004–2017 HMDA Data

Race/Ethnicity	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Average
American Indian	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	33.3%	14.3%
Asian	0.0%	0.0%	0.0%	20.0%	0.0%	0.0%	10.0%	0.0%	14.3%	6.2%	4.6%
Black	25.0%	20.0%	25.0%	20.0%	21.4%	57.1%	16.7%	15.4%	11.1%	21.4%	21.4%
Pacific Islander	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
White	7.6%	9.9%	7.6%	10.5%	4.1%	7.1%	8.8%	3.1%	9.3%	7.0%	7.4%
Not Available	50.0%	16.7%	16.7%	66.7%	100.0%	60.0%	60.0%	0.0%	0.0%	16.7%	33.3%
Not Applicable	50.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	33.3%
<b>Average</b>	<b>11.3%</b>	<b>10.3%</b>	<b>9.5%</b>	<b>13.0%</b>	<b>6.4%</b>	<b>10.2%</b>	<b>11.0%</b>	<b>3.7%</b>	<b>9.4%</b>	<b>8.8%</b>	<b>9.3%</b>
Non-Hispanic	0.0%	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	8.7%
Hispanic	9.0%	9.3%	8.6%	12.8%	5.4%	8.9%	10.1%	3.9%	9.2%	8.6%	8.5%

## Predatory Lending

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

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 (APR) loans (HALs), defined as more than three percentage points higher than comparable treasury rates for home purchase loans, or five percentage points higher for refinance loans.

Home loans are designated as “high-annual percentage rate” loans (HALs) where the annual percentage rate on the loan exceeds that of a comparable treasury instruments by at least three percentage points. As shown in Table IV.56, some 1,612 loans between 2008 and 2017 were HALs, accounting for 2.1 percent.

<b>Table IV.56</b> <b>Originated Owner-Occupied Loans by HAL Status</b> Starkville city 2008–2017 HMDA Data											
<b>Loan Type</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>Total</b>
HAL	14	19	0.0	0.0	0.0	1.0	0.0	0.0	0.0	0.0	34
Other	166	163	133	120	161	158	145	183	184	165	1,578
<b>Total</b>	<b>180</b>	<b>182</b>	<b>133</b>	<b>120</b>	<b>161</b>	<b>159</b>	<b>145</b>	<b>183</b>	<b>184</b>	<b>165</b>	<b>1,612</b>
Percent HAL	7.8%	10.4%	0.0%	0.0%	0.0%	0.6%	0.0%	0.0%	0.0%	0.0%	2.1%

While white households experienced HAL rates at 2.5 percent between 2008 and 2017, black households had a rate of HALs at 1.0 percent.

<b>Table IV.57</b> <b>Rate of HALs Originated by Race/Ethnicity of Borrower</b> Starkville city 2008–2017 HMDA Data											
<b>Race</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>Average</b>
American Indian	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Asian	25.0%	7.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	2.9%
Black	0.0%	6.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.0%
Pacific Islander	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
White	8.2%	11.6%	0.0%	0.0%	0.0%	0.7%	0.0%	0.0%	0.0%	0.0%	2.5%
Not Available	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Not Applicable	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
<b>Average</b>	<b>7.8%</b>	<b>10.4%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.6%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>2.1%</b>
Hispanic	50.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	5.0%
Non-Hispanic	7.6%	10.3%	0.0%	0.0%	0.0%	0.6%	0.0%	0.0%	0.0%	0.0%	2.3%

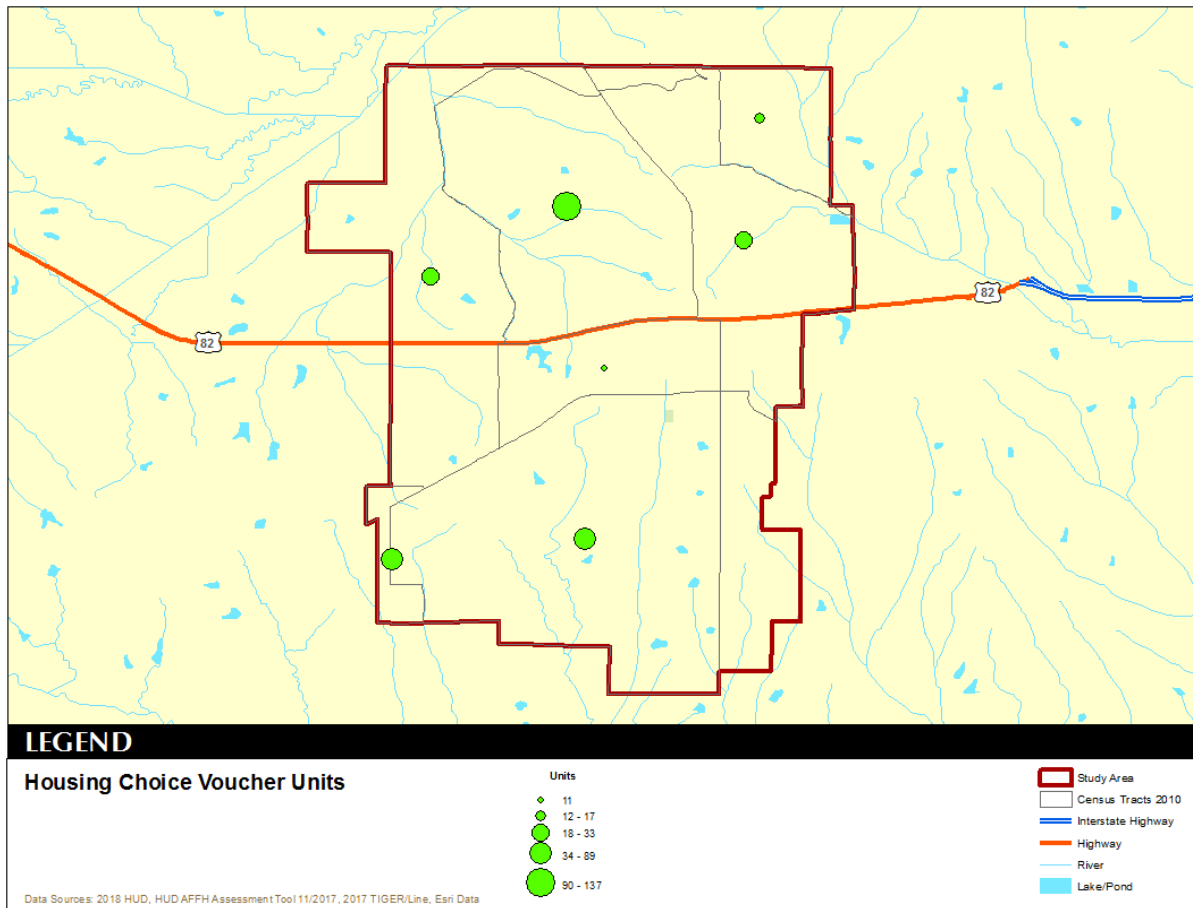
## G. PUBLICLY SUPPORTED HOUSING ANALYSIS

The number of public housing units are shown in Table IV.58, below. There are 775 public housing units in Starkville city, of which 107 are for households with disabilities. In total, there are 244 public housing units, 254 Project Based Section 8 units, 0 other HUD Multifamily units, and 277 Housing Choice Voucher units.

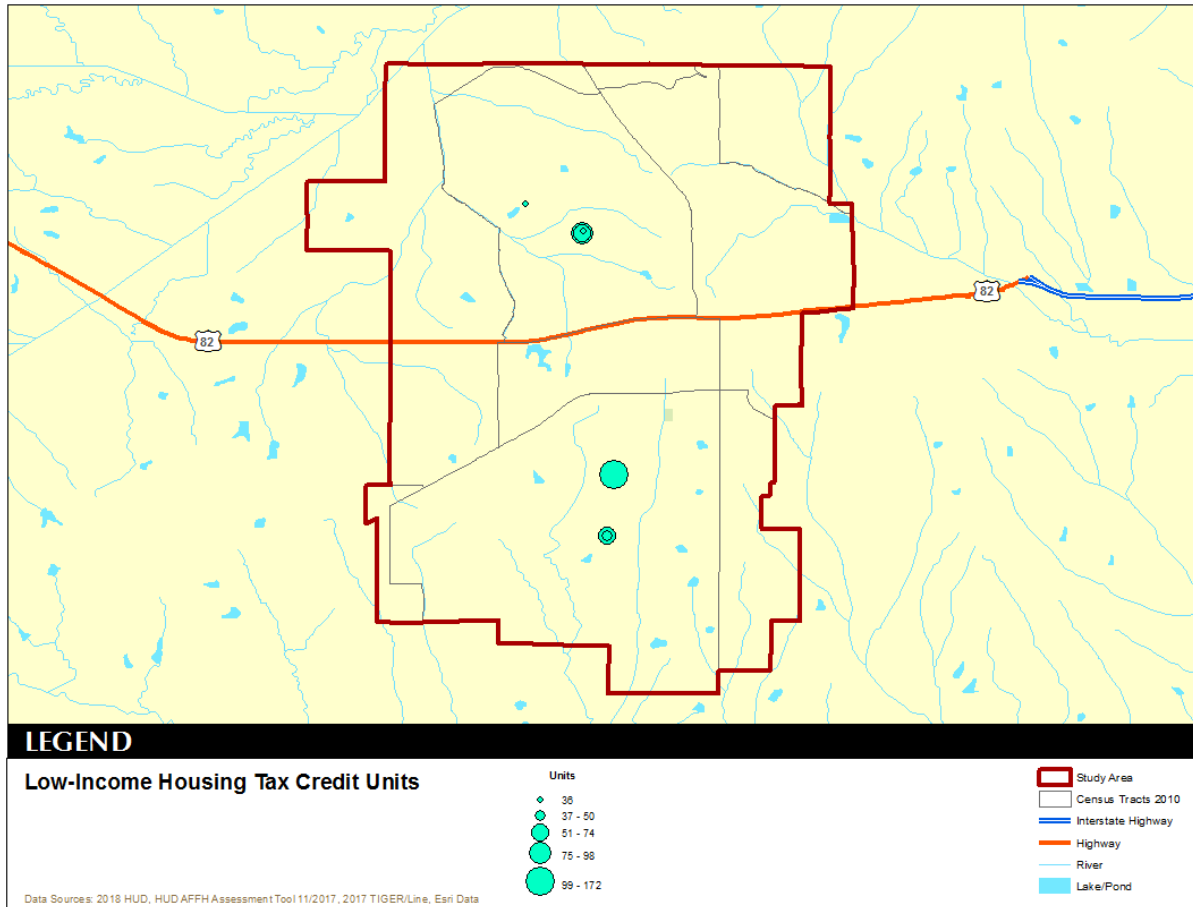
<b>Table IV.58</b> <b>Residents with Disabilities by Subsidized Housing Type</b> Starkville city HUD AFFH Raw Database		
<b>Program</b>	<b>Total Units</b>	<b>Total Disabled Units</b>
Public Housing	244	44
Project Based Section 8	254	20
Other HUD Multifamily	0	0.0
Housing Choice Vouchers	277	43
<b>Total</b>	<b>775</b>	<b>107</b>

Map IV.11 shows the location of Housing Choice Vouchers. Map IV.12 shows the location of Low-Income Housing Tax Credit (LIHTC) Units, Map IV.13 shows the location of Public Housing Units, and Map IV.14 shows the location of Project-Based Section 8 units.

**Map IV.11**  
**Housing Choice Vouchers**  
 Starkville city  
 AFFH Data

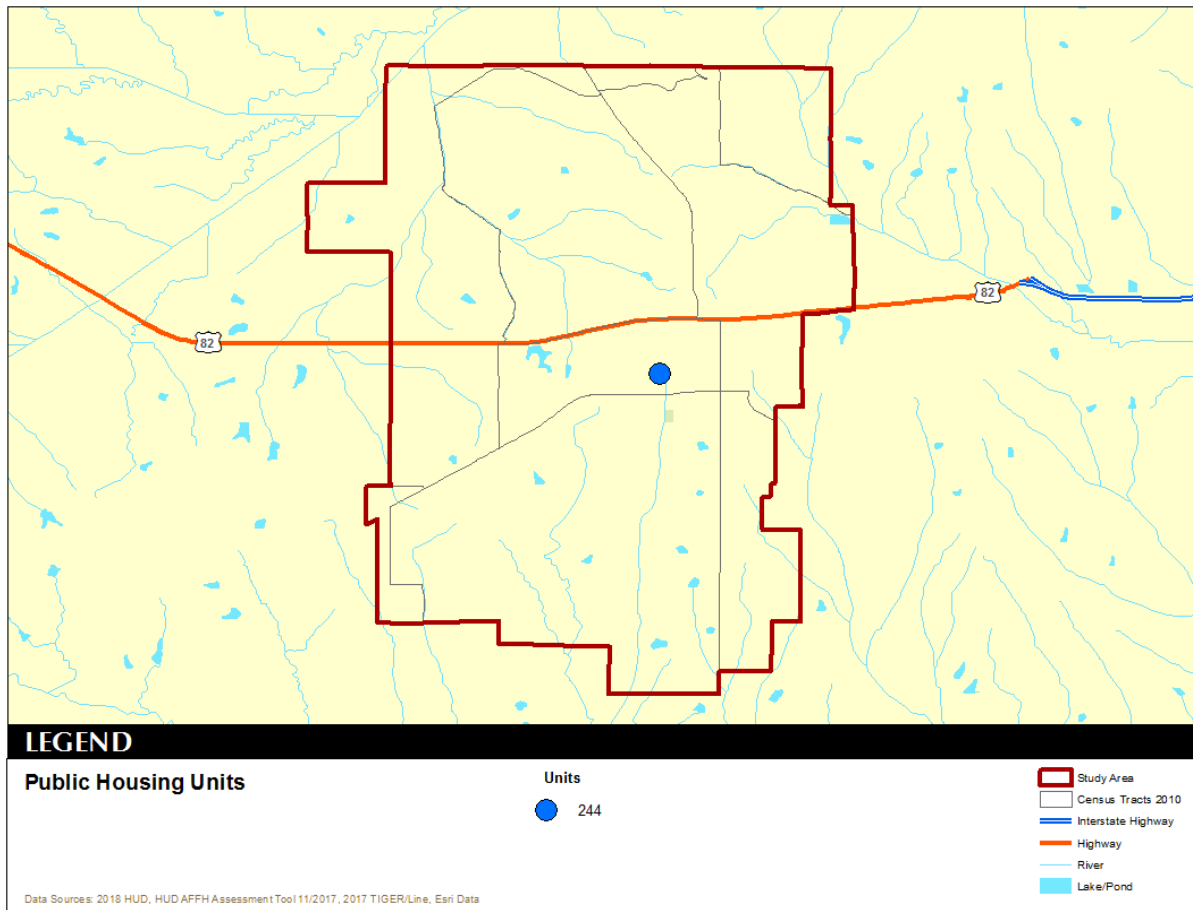


**Map IV.12**  
**Low-Income Housing Tax Credit Units**  
 Starkville city  
 AFFH Data

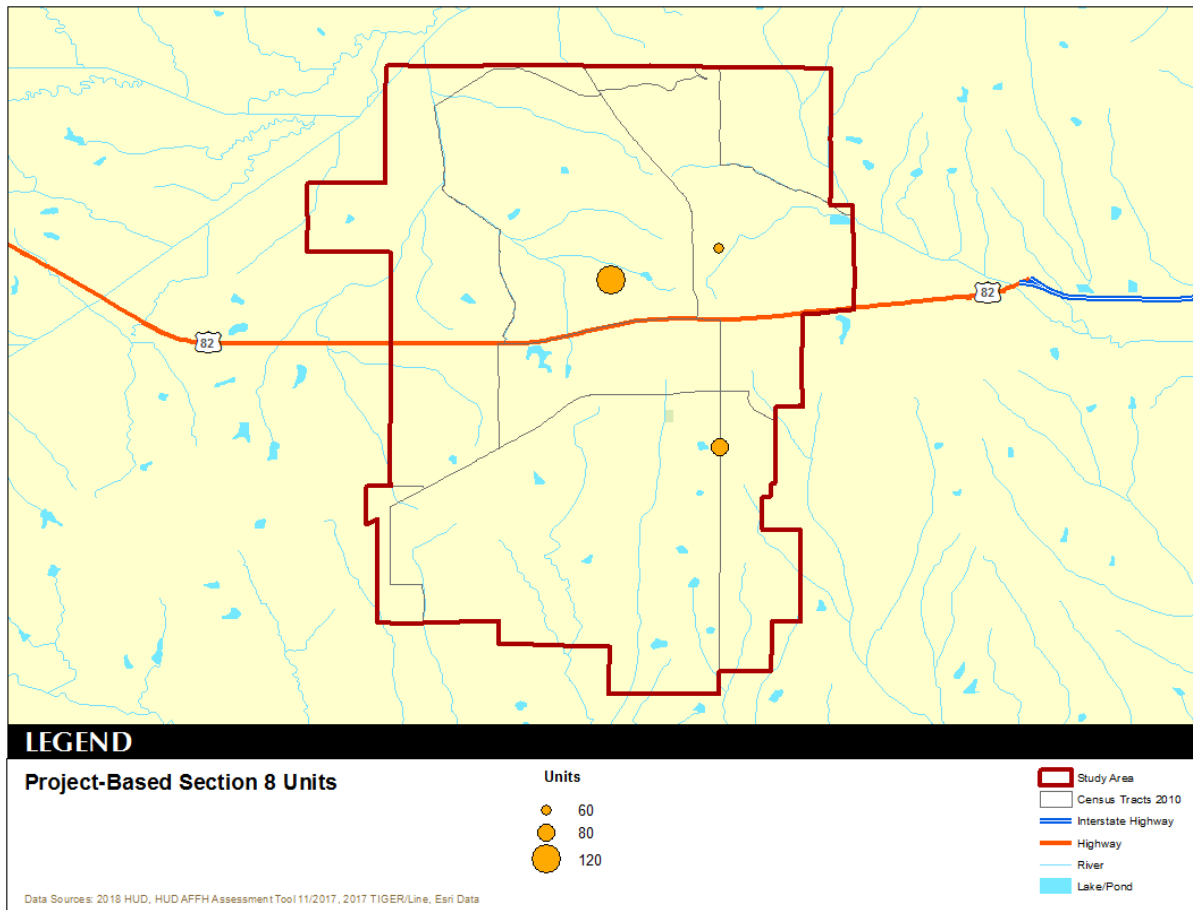




**Map IV.13**  
**Public Housing Units**  
 Starkville city  
 AFFH Data



**Map IV.14**  
**Project-Based Section 8 Units**  
 Starkville city  
 AFFH Data



Additional data is presented in the following tables about the Housing Authority. These data present data directly from the Housing Authority's records. The Housing Authority has a total of 244 assisted households.

<b>Table IV.59</b> <b>What is the total number of your assisted households, with vouchers, regular low-income housing, public housing, and other low-income housing you own?</b> Starkville Housing Authority Public Housing Authority Survey	
<b>Total</b>	
244	

The race and ethnicity of these assisted units are shown in the tables below.

<b>Table IV.60</b> <b>Of your assisted households, how many of the head of households are:</b> Starkville Housing Authority Public Housing Authority Survey	
<b>Race</b>	<b>Head of Households</b>
White	10
Black	234
American Indian/Native American	0
Asian	0
Native Hawaiian/Pacific Islander	0
Two or more races	0
Don't know	0
<b>Total</b>	<b>244</b>

<b>Table IV.61</b> <b>Of your assisted households, how many of the head of households are:</b> Starkville Housing Authority Public Housing Authority Survey	
<b>Ethnicity</b>	<b>Head of Households</b>
Hispanic	0
Non-Hispanic	0
<b>Total</b>	<b>0</b>

Some 122 households are considered to have one or more persons with a disability.

<b>Table IV.62</b> <b>How many households have one or more persons with disabilities?</b> Starkville Housing Authority Public Housing Authority Survey	
<b>Response</b>	<b>Responses</b>
One or more persons with disabilities	122

A majority of households have a female head of household, and 91 households have children present.

<b>Table IV.63</b> <b>How many of the head of households are:</b> Starkville Housing Authority Public Housing Authority Survey	
<b>Response</b>	<b>Total</b>
Male	46
Female	198
Female with one or more children in the home under the age of 18	88
Male with one or more children in the home under the age of 18	3
<b>Total</b>	<b>91</b>

The number of units by size are shown in the table below.

<b>Table IV.64</b> <b>How many of your public housing units are:</b> Starkville Housing Authority Public Housing Authority Survey		
<b>Type of Unit</b>	<b>Owned</b>	<b>Vacant or soon to be empty and available for rent</b>
Efficiency	4	0
One Bedroom	50	0
Two Bedroom	104	0
Three Bedroom	66	4
Four Bedroom	8	1
Five or more Bedroom	3	0
<b>Total Number of Units</b>	<b>244</b>	<b>0</b>

The Housing Authority does not have an Affirmative Action Plan.

<b>Table IV.65</b> <b>Do you have an Affirmative Action Plan?</b> Starkville Housing Authority Public Housing Authority Survey			
Yes	No	Don't Know	Missing
0	1	0	0

The Housing Authority does not have admissions preferences or housing designations.

<b>Table IV.66</b> <b>Do you have an Admissions Preferences or Housing Designations?</b> Starkville Housing Authority Public Housing Authority Survey			
Yes	No	Don't Know	Missing
0	1	0	0

<b>Table IV.67</b> <b>Do you have Voucher Mobility or Portability Policies and Practices?</b> Starkville Housing Authority Public Housing Authority Survey			
Yes	No	Don't Know	Missing
0	1	0	0

The Housing Authority is not subject to a charge letter from HUD, a fair housing cause determination, or a claim under the False Claims Act.

<b>Table IV.68</b> <b>Is your PHA currently subject to any of the following:</b> Starkville Housing Authority Public Housing Authority Survey				
	Yes	No	Don't Know	Missing
A charge or letter of finding from HUD concerning a violation of a civil rights related law	0	1	0	0
A cause determination for a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law	0	1	0	0
A letter of findings issues by a lawsuit file or joined by the Department of Justice alleging a pattern or practices or systematic violation of a fair housing or civil rights law	0	1	0	0
A claim under False Claims Acts related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmative further fair housing	0	1	0	0

## H. DISABILITY AND ACCESS

The disability rate from the 2000 Census is shown in Table IV.69. Some 15.9 percent of the population was disabled in 2000, or a total of 3,229 persons. The disability rate was highest for those over 65, with 38.2 percent disabled.

<b>Table IV.69</b> <b>Disability by Age</b> Starkville city 2000 Census SF3 Data		
Age	Total	
	Disabled Population	Disability Rate
5 to 15	154	5.8%
16 to 64	2,393	15.0%
65 and older	682	38.2%
<b>Total</b>	<b>3,229</b>	<b>15.9%</b>

Table IV.70 shows disability by type in 2000. There were 1,156 physical disabilities reported in 2000, some 1,477 employment disabilities, and 1,041 go-outside-home disabilities.

<b>Table IV.70</b> <b>Total Disabilities Talled: Aged 5 and Older</b> Starkville city 2000 Census SF3 Data	
Disability Type	Population
Sensory disability	646
Physical disability	1,156
Mental disability	900
Self-care disability	472
Employment disability	1,477
Go-outside-home disability	1,041
<b>Total</b>	<b>5,692</b>

Disability by age, as estimated by the 2016 ACS, is shown in Table IV.71. The disability rate for females was 12.8 percent, compared to 9.5 percent for males. The disability rate grew precipitously higher with age, with 53.4 percent of those over 75 experiencing a disability.

<b>Table IV.71</b> <b>Disability by Age</b> Starkville city 2016 Five-Year ACS Data						
Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	0	0.0%	13	1.7%	13	0.9%
5 to 17	169	9.3%	24	1.8%	193	6.1%
18 to 34	319	5.7%	240	4.4%	559	5.0%
35 to 64	375	13.0%	659	18.8%	1,034	16.2%
65 to 74	116	19.1%	208	28.5%	324	24.2%
75 or Older	181	35.4%	452	67.0%	633	53.4%
<b>Total</b>	<b>1,160</b>	<b>9.5%</b>	<b>1,596</b>	<b>12.8%</b>	<b>2,756</b>	<b>11.2%</b>

The number of disabilities by type, as estimated by the 2016 ACS, is shown in Table IV.72. Some 6.7 percent have an ambulatory disability, 3.6 percent have an independent living disability, and 2.8 percent have a self-care disability.

<b>Table IV.72</b> <b>Total Disabilities Tallied: Aged 5 and Older</b> Starkville city 2016 Five-Year ACS		
<b>Disability Type</b>	<b>Population with Disability</b>	<b>Percent with Disability</b>
Hearing disability	572	2.3%
Vision disability	432	1.8%
Cognitive disability	1,121	4.8%
Ambulatory disability	1,560	6.7%
Self-Care disability	656	2.8%
Independent living disability	725	3.6%

## DISABILITY AND ACCESS WORKGROUPS

Four (4) Disability and Access Workgroups were held in late 2018 to gather input in the needs of households with disabilities in accessing housing. Some comments are included below. A complete set of transcripts are included in the Appendix.

- Persons with disabilities tend to congregated in urban areas in order to access public transit
- Lack of available accessible units, and a lack of new development of accessible units
- There is continued need to permanent supportive housing for persons with disabilities
- NIMYism continues to be a challenge for new units, especially group homes
- There should be a mandate that all new housing development includes a percentage as accessible units
- Significant need for transportation for persons with disabilities
- There is a need for integrated services beyond just housing

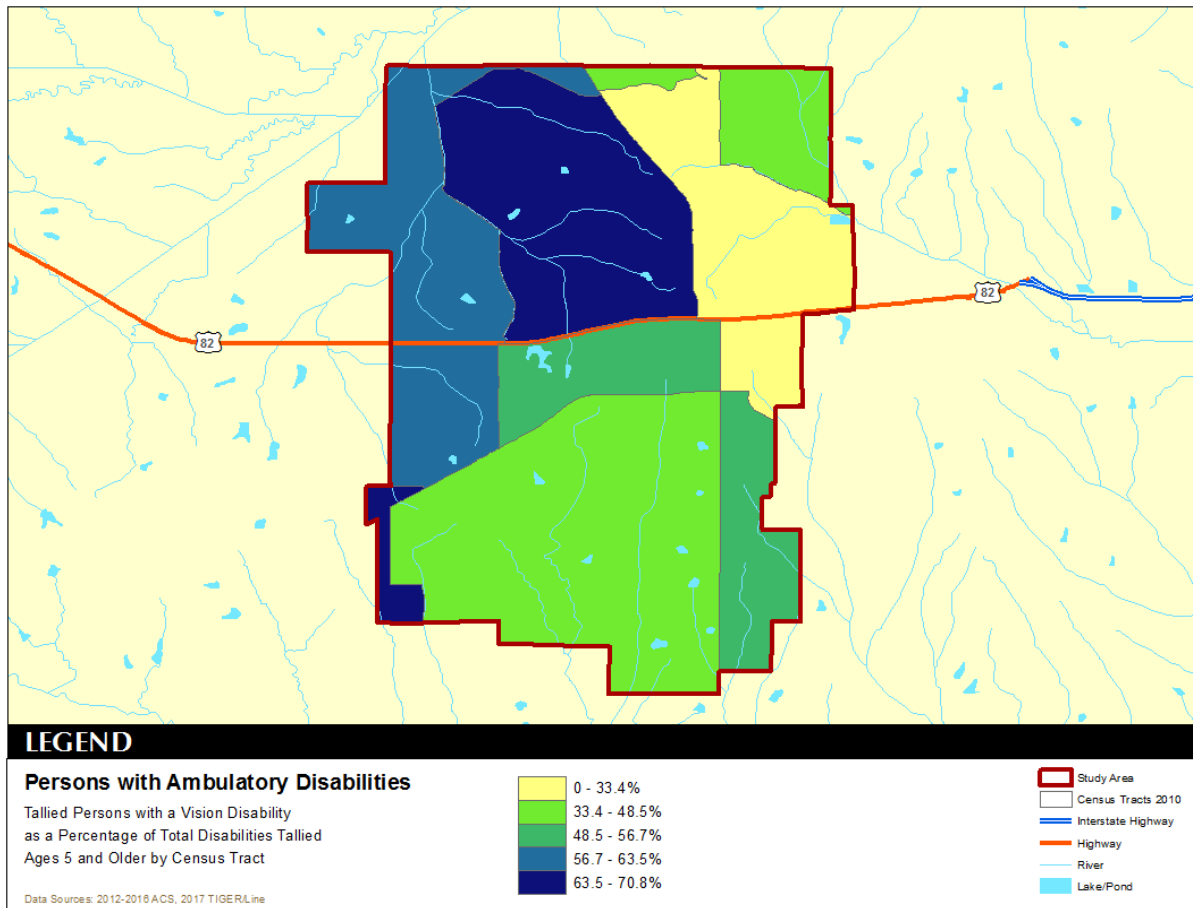
## HOUSING ACCESSIBILITY

Accessible housing units are located throughout the area. Some 107 publicly supported housing units are available for households with disabilities, out of 775 total publicly supported housing units in Starkville city, according to HUD's AFFH database, are accessible.

<b>Table IV.73</b> <b>Residents with Disabilities by Subsidized Housing Type</b> Starkville city HUD AFFH Raw Database		
<b>Program</b>	<b>Total Units</b>	<b>Total Disabled Units</b>
Public Housing	244	44
Project Based Section 8	254	20
Other HUD Multifamily	0	0.0
Housing Choice Vouchers	277	43
<b>Total</b>	<b>775</b>	<b>107</b>

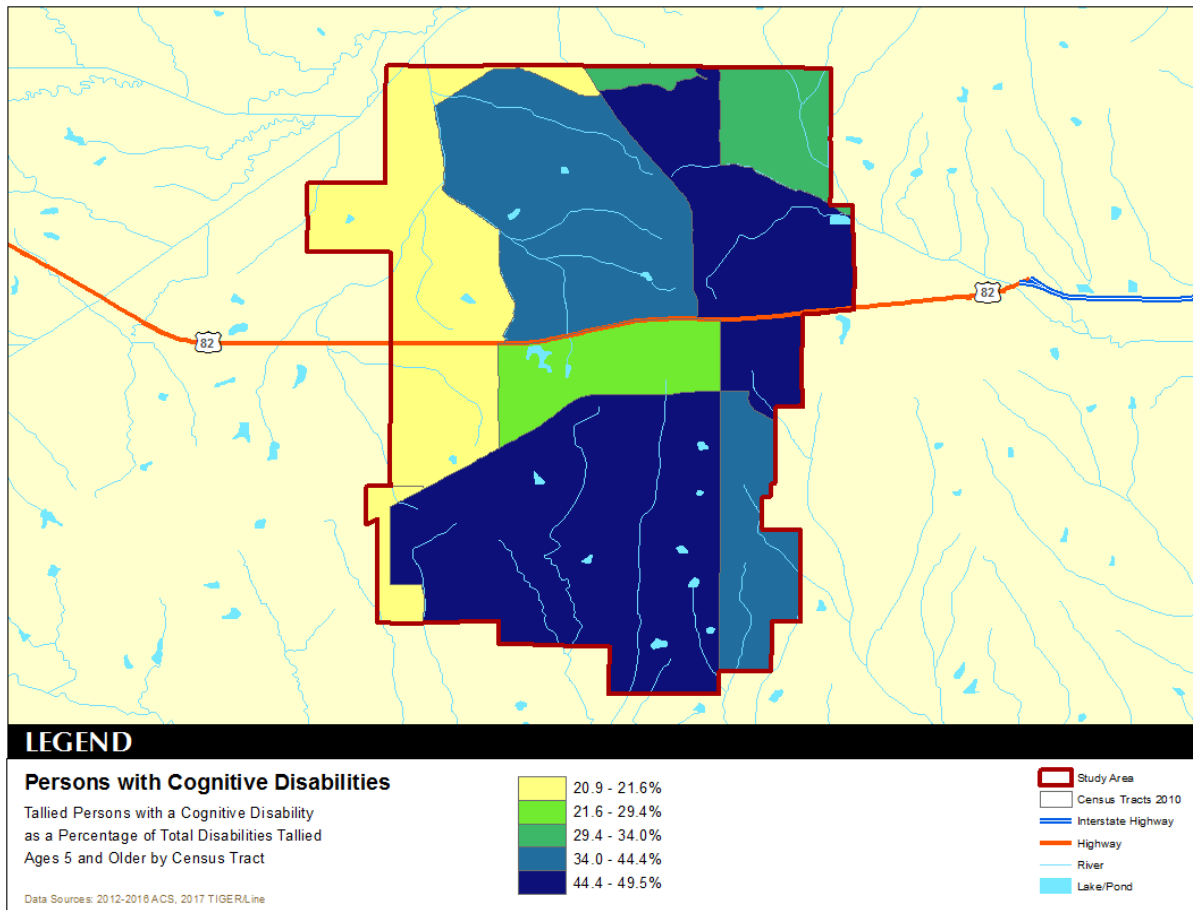
The concentrations of persons with various types of disabilities are shown in the following maps. Maps IV.15 through IV.20 show persons with ambulatory disabilities, persons with cognitive disabilities, persons with hearing disabilities, persons with independent living disabilities, persons with self-care disabilities, and persons with vision disabilities.

**Map IV.15**  
**Persons with Ambulatory Disabilities**  
 Starkville city  
 AFFH Data

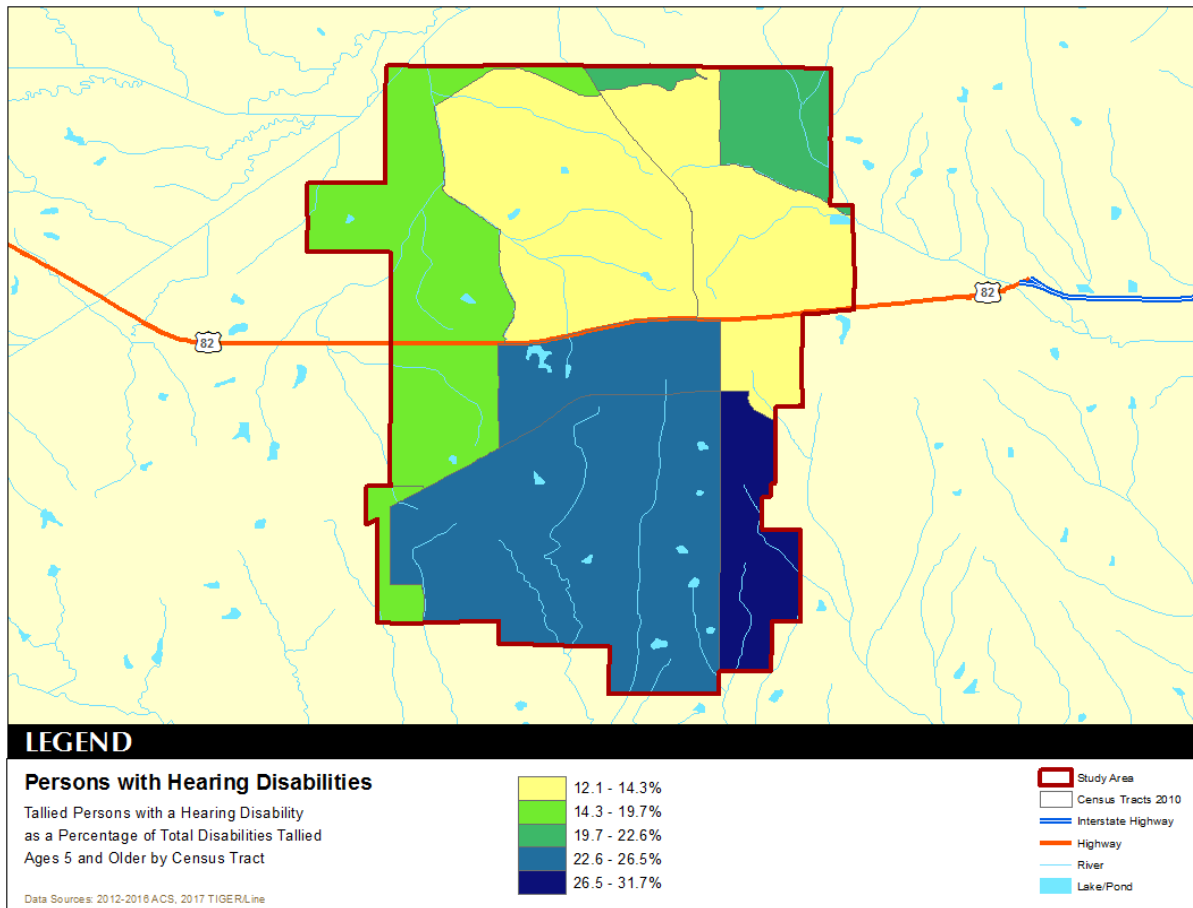




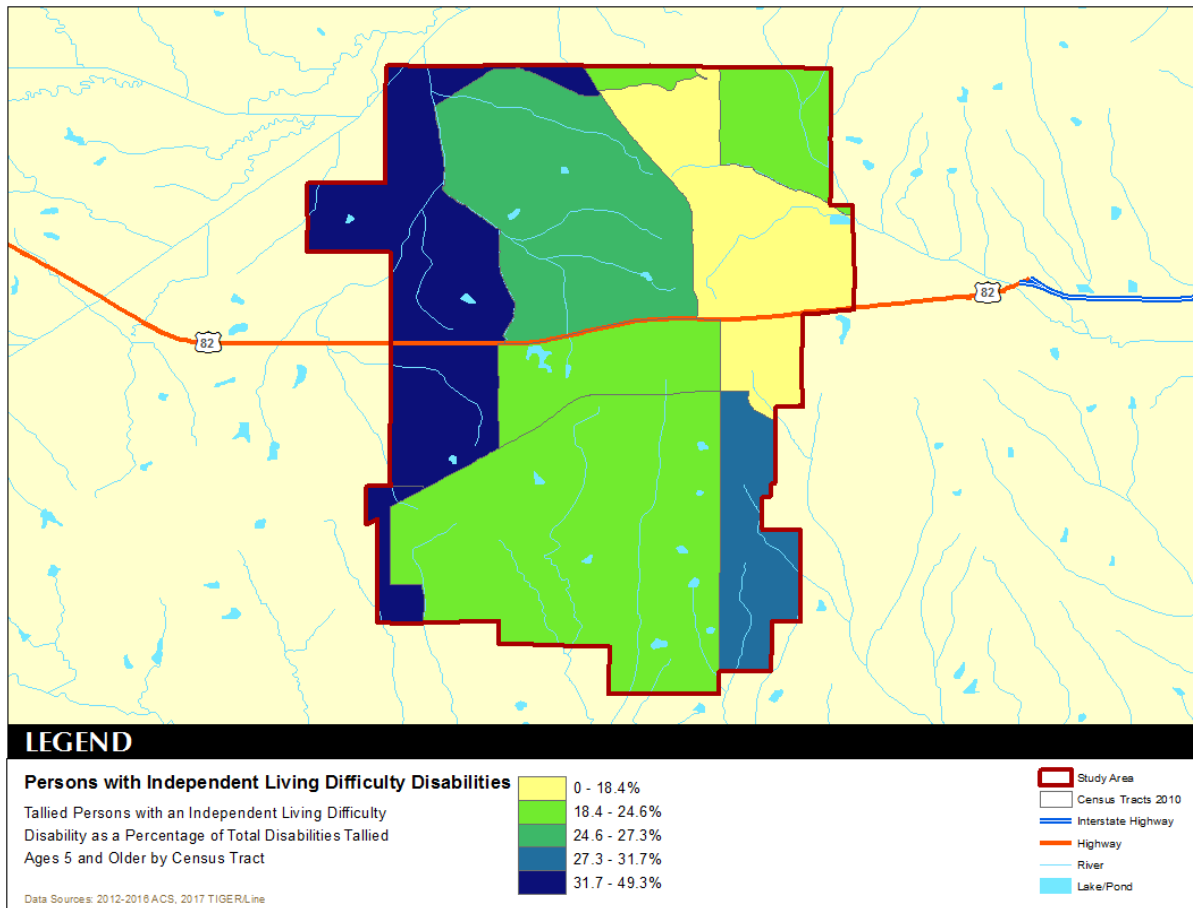
**Map IV.16**  
**Persons with Cognitive Disabilities**  
 Starkville city  
 AFFH Data



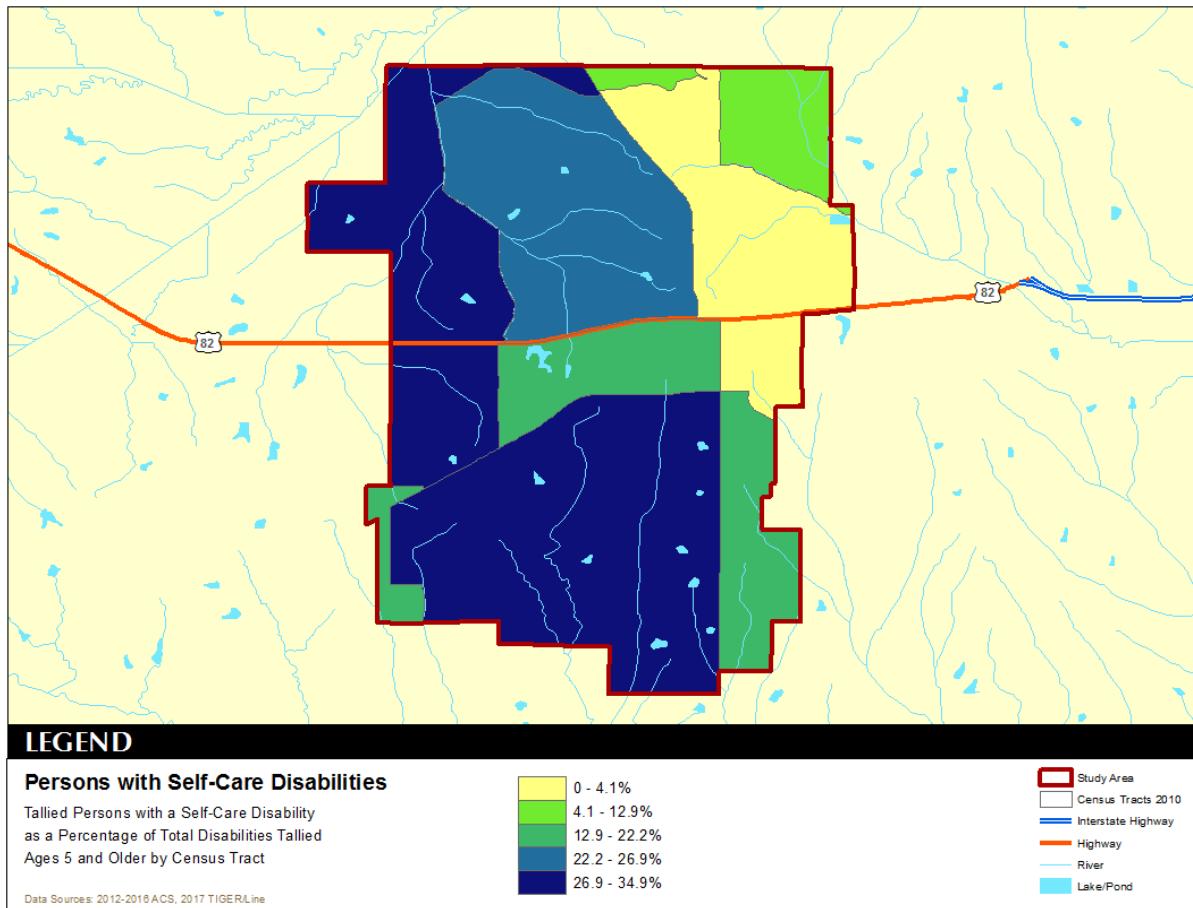
**Map IV.17**  
**Persons with Hearing Disabilities**  
 Starkville city  
 AFFH Data



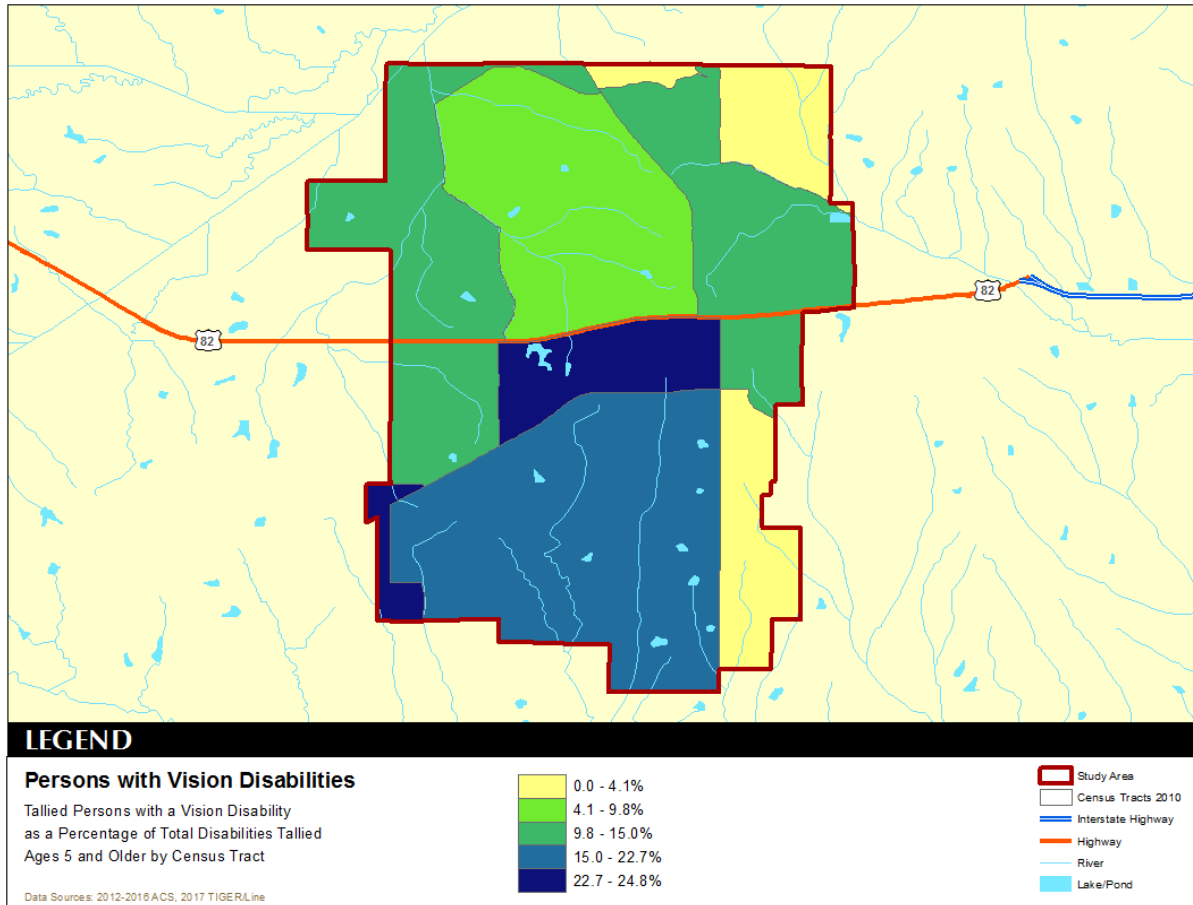
**Map IV.18**  
**Persons with Independent Living Disabilities**  
 Starkville city  
 AFFH Data



**Map IV.19**  
**Persons with Self Care Disabilities**  
 Starkville city  
 AFFH Data



**Map IV.20**  
**Persons with Vision Disabilities**  
 Starkville city  
 AFFH Data



## I. FAIR HOUSING ENFORCEMENT, OUTREACH CAPACITY, & RESOURCES

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### FEDERAL FAIR HOUSING LAWS

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

*Fair Housing Act* Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and persons securing custody of children under the age of 18), and handicap (disability).<sup>160</sup>

Title VIII was amended in 1988 (effective March 12, 1989) by the *Fair Housing Amendments Act* . . . In connection with prohibitions on discrimination against individuals with disabilities, the Act contains design and construction accessibility provisions for certain new multi-family dwellings developed for first occupancy on or after March 13, 1991.<sup>161</sup>

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

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

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

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

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

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<sup>160</sup> "HUD Fair Housing Laws and Presidential Executive Orders."

[http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/fair\\_housing\\_equal\\_opp/FHLaws](http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/FHLaws)

<sup>161</sup> "Title VIII: Fair Housing and Equal Opportunity."

[http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/fair\\_housing\\_equal\\_opp/progdesc/title8](http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/progdesc/title8)

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

*Title IX of the Education Amendments Act of 1972* Title IX prohibits discrimination on the basis of sex in education programs or activities that receive federal financial assistance.<sup>162</sup>

## STATE AGENCIES

At present there are no governmental agencies at the state level that accept or investigate complaints of unlawful discrimination on behalf of Mississippi residents.

## PRIVATE ORGANIZATION

The Mississippi Center for Justice, a public interest law firm, serves residents of Mississippi who believe that they have been subjected to unlawful discrimination in fair housing choice, in addition to working to “promote educational opportunity, protect the rights of consumers, secure access to healthcare, ensure equity in disaster recovery, and put affordable housing within reach of all Mississippians<sup>163</sup>.” A FHIP grantee, the Center for Justice accepts complaints from Mississippi residents who believe that they have been subjected to unlawful discrimination in housing choice. The Center for Justice has three offices throughout the state, and they may be contacted through the information below. The Center for Justice may also be contacted through an online contact form available at <http://www.mscenterforjustice.org/contact-us>.

### **Address (Jackson Office):**

5 Old River Place, Suite 203 (39202)  
P.O. Box 1023 Jackson, MS 39215-1023  
Phone: (601) 352-2269  
Fax: (601) 352-4769

### **Address (Biloxi Office)**

Division Street  
Biloxi, MS 39530-2961  
Phone: (228) 435-7284  
Fax: (228) 435-7285

### **Address (Indianola Office)**

120 Court Avenue  
Indianola, MS 38751  
Phone: (662) 887-6570  
Fax: (662) 887-6571

<sup>162</sup> “HUD Fair Housing Laws and Presidential Executive Orders.”

<sup>163</sup> Mississippi Center for Justice. “Our Work”. Mississippi Center for Justice Website. 3 Jan 2019.  
<<http://www.mscenterforjustice.org/our-work/our-work>>

## FAIR HOUSING COMPLAINTS

Federal Fair Housing Law prohibits housing discrimination based on race, color, national origin, religion, sex, familial status, or disability. An individual may file a complaint if they feel their rights have been violated. HUD maintains records of complaints that represent potential and actual violations of federal housing law.

Fair Housing and Equal Opportunity (FHEO) begins its complaint investigation process shortly after receiving a complaint. A complaint must be filed within one year of the last date of the alleged discrimination under the Fair Housing Act. Other civil rights authorities allow for complaints to be filed after one year for good cause, but FHEO recommends filing as soon as possible. Generally, FHEO will either investigate the complaint or refer the complaint to another agency to investigate. Throughout the investigation, FHEO will make efforts to help the parties reach an agreement. If the complaint cannot be resolved voluntarily by an agreement, FHEO may issue findings from the investigation. If the investigation shows that the law has been violated, HUD or the Department of Justice may take legal action to enforce the law.

The complaint data presented in this section includes the entirety of the service area, and does not reflect the Housing Authority.

Over the 2008 through 2018 study period, the agency received a total of 5 complaints alleging discrimination in Starkville city. Some 1 of these complaints were on the basis of race, 2 for a disability, 0 for sex, and 2 for familial status.

<b>Table IV.74</b> <b>Fair Housing Complaints by Basis</b> Starkville city HUD Fair Housing Complaints												
<b>Basis</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>Total</b>
Disability	0	0	0	0	1	0	0	0	0	1	0	2
Familial Status	0	0	2	0	0	0	0	0	0	0	0	2
Race	0	0	1	0	0	0	0	0	0	0	0	1
<b>Total Basis</b>	<b>0</b>	<b>0</b>	<b>3</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>5</b>
Total Complaints	0	0	3	0	1	0	0	0	0	1	0	5

As shown in the table below, 0 of those complaints was successfully conciliated or settled, and 1 had no caused determination.



**Table IV.75**  
**Fair Housing Complaints by Closure**  
 Starkville city  
 HUD Fair Housing Complaints

Basis	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
Complaint withdrawn by complainant after resolution	0	0	2	0	0	0	0	0	0	0	0	2
No cause determination	0	0	1	0	0	0	0	0	0	0	0	1
Complainant failed to cooperate	0	0	0	0	0	0	0	0	0	1	0	1
Dismissed for lack of jurisdiction	0	0	0	0	1	0	0	0	0	0	0	1
<b>Total Closures</b>	<b>0</b>	<b>0</b>	<b>3</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>5</b>
Total Complaints	0	0	3	0	1	0	0	0	0	1	0	5

Those who file fair housing complaints with the Department of Housing and Urban Development may include more than one discriminatory action, or issue, in those complaints. Fair housing complaints from Starkville city cited 16 issues total. Failure to make reasonable accommodation accounted for 2 and discriminatory terms, conditions, privileges, or services and facilities represented 3.

**Table IV.76**  
**Fair Housing Complaints by Issue**  
 Starkville city  
 HUD Fair Housing Complaints

Issue	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
Discrimination in terms/conditions/privileges relating to rental	0	0	2	0	0	0	0	0	0	1	0	3
Discriminatory terms, conditions, privileges, or services and facilities	0	0	1	0	1	0	0	0	0	0	0	2
Failure to make reasonable accommodation	0	0	0	0	1	0	0	0	0	1	0	2
Otherwise deny or make housing unavailable	0	0	0	0	0	0	0	0	0	1	0	1
Discriminatory refusal to rent and negotiate for rental	0	0	1	0	0	0	0	0	0	0	0	1
Non-compliance with design and construction requirements (handicap)	0	0	0	0	1	0	0	0	0	0	0	1
Failure to provide an accessible building entrance	0	0	0	0	1	0	0	0	0	0	0	1
Failure to provide an accessible route into and thru the covered unit	0	0	0	0	1	0	0	0	0	0	0	1
Failure to provide usable doors	0	0	0	0	1	0	0	0	0	0	0	1
Failure to permit reasonable modification	0	0	0	0	1	0	0	0	0	0	0	1
Failure to provide usable kitchens and bathrooms	0	0	0	0	1	0	0	0	0	0	0	1
Failure to provide accessible light switches, electric outlets, etc.	0	0	0	0	1	0	0	0	0	0	0	1
<b>Total Issues</b>	<b>0</b>	<b>0</b>	<b>4</b>	<b>0</b>	<b>9</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>3</b>	<b>0</b>	<b>16</b>
Total Complaints	0	0	3	0	1	0	0	0	0	1	0	5

## Fair Housing Complaints Found With Cause

The table below shows fair housing complaints in Starkville city found with causes by basis. Some 2 complaints were found to have cause. Of these, 0 were on the basis of disability, 1 on the basis of race, and 1 on the basis of familial status.

<b>Table IV.77</b> <b>Fair Housing Complaints by Basis</b> Starkville city HUD Fair Housing Complaints												
Basis	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
Race	0	0	1	0	0	0	0	0	0	0	0	1
Familial Status	0	0	1	0	0	0	0	0	0	0	0	1
<b>Total Basis</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>2</b>
Total Complaints Found with Cause	0	0	2	0	0	0	0	0	0	0	0	2

Fair Housing complaints with cause by issue are shown in the table of the following page. For the 2 total complaints with cause, there were a total of 3 issues. Failure to make reasonable accommodation accounted for 0 issues, and discriminatory terms, conditions, privileges, or services and facilities, accounting for 1.

<b>Table IV.78</b> <b>Fair Housing Complaints by Issue</b> Starkville city HUD Fair Housing Complaints												
Issue	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
Discrimination in terms/conditions/privileges relating to rental	0	0	1	0	0	0	0	0	0	0	0	1
Discriminatory terms, conditions, privileges, or services and facilities	0	0	1	0	0	0	0	0	0	0	0	1
Discriminatory refusal to rent and negotiate for rental	0	0	1	0	0	0	0	0	0	0	0	1
<b>Total Issues</b>	<b>0</b>	<b>0</b>	<b>3</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>3</b>
Total Complaints Found with Cause	0	0	2	0	0	0	0	0	0	0	0	2

## J. FAIR HOUSING SURVEY

The Fair Housing survey has a total of 52 responses to date. Some 15 respondents live in single-family homes, another 12 live in 1-4 story apartments, and 0 live in apartments with 5 or more stories.

<b>Table IV.79</b> <b>Which of the following best describes the type of housing you currently live in?</b> Starkville city Fair Housing Survey	
<b>Housing</b>	<b>Responses</b>
Single-family home (detached)	15
Twin-home or duplex	16
Condo/Townhouse	0
Apartment building with 1-4 stories	12
Apartment building with 5 or more stories	0
Something else, please specify	5
Missing	4
<b>Total</b>	<b>52</b>

As seen in Table IV.80, some 3937 respondents live in public housing, some 0 live in Multi-Family Section 8, and 0 live in Tenant Based Section 8.

<b>Table IV.80</b> <b>If you live in a subsidized/assisted housing, please indicate what type:</b> Starkville city Fair Housing Survey	
<b>Type</b>	<b>Responses</b>
Public Housing	39
Multi-Family Section 8	0
Tenant Based Section 8	0
Project Based Section 8	0
Other Assisted Housing	0
Don't Know	7
Does Not Apply	2
Other	0
Missing	4
<b>Total</b>	<b>52</b>

Table IV.81 shows how long respondents have lived in their neighborhoods. As seen on the following page, some 13 respondents have lived in their neighborhood for less than 1 year, while 7 respondents have lived in their neighborhood for 11-20 years.

<b>Table IV.81</b> <b>How long have you lived in your neighborhood?</b> Starkville city Fair Housing Survey	
<b>Time</b>	<b>Responses</b>
Less than 1 year	13
1-5 years	16
6-10 years	4
11-20 years	7
21-30 years	2
More than 30 years	9
Missing	1
<b>Total</b>	<b>52</b>

Table IV.82 shows the most important reasons respondents decided to live in their neighborhood. Some 17 respondents' most important reason was to live near family and friends, some 9 to live close to work, and 35 due to the affordability of housing.

<b>Table IV.82</b> <b>Which of the following were the most important reasons you decided to live in your neighborhood? (Check all that apply)</b> Starkville city Fair Housing Survey	
<b>Reason</b>	<b>Responses</b>
To live near family and friends	17
To be close to work	9
Accessibility of goods and services, such as neighborhood centers and stores	18
To be near public transportation	10
Physical accessibility of the building	6
Nearby schools for my children/grandchildren	7
Access to job opportunities	2
Safety in the neighborhood	16
Affordability of housing	35
I grew up here	5
No choice/ Nowhere else to go	4

If respondents had a choice to continue to live in their neighborhood, some 40 respondents would, while 5 would not.

<b>Table IV.83</b> <b>If you had a choice would you continue to live in your city or neighborhood?</b> Starkville city Fair Housing Survey	
<b>Yes/No</b>	<b>Responses</b>
Yes	40
No	5
Not Sure	6
Missing	1
<b>Total</b>	<b>52</b>

The table below shows how respondents rate the different aspects of their neighborhood or housing development. Some 16 respondents would rate cleanliness as excellent, while 16 respondents rate cleanliness as poor. The availability of job opportunities was rated as excellent by 5 respondents and poor by 16 respondents.

<b>Table IV.84</b> <b>How would you rate each of the following aspects of your neighborhood/housing development?</b> Starkville city Fair Housing Survey								
<b>Aspects</b>	<b>Excellent</b>	<b>Very Good</b>	<b>Good</b>	<b>Fair</b>	<b>Poor</b>	<b>Don't Know</b>	<b>Missing</b>	<b>Total</b>
Cleanliness	16	16	3	1	0	0	16	52
Condition of the buildings (including homes)	10	29	7	4	0	0	2	52
Condition of streets and sidewalks	8	30	11	0	0	0	3	52
Condition of the public spaces	7	28	6	5	3	0	3	52
Schools in the neighborhood	12	27	3	0	8	0	2	52
Access to public transportation	17	27	3	0	3	0	2	52
Availability of quality public housing	13	23	3	2	9	0	2	52
Availability of job opportunities	5	20	7	2	16	0	2	52

Respondents also rated how easy it is to get to a variety of places, including parks, libraries, and grocery stores. While 43 respondents said it would be easy to access supermarkets or grocery stores, some 3 respondents said it would be difficult to access. If the household had a disability, some 1 respondents said it was easy getting around their neighborhood or housing complex, compared to 1 saying it would be difficult.

<b>Table IV.85</b> <b>Please indicate how easy it would be for you to get to each of the following places?</b> Starkville city Fair Housing Survey							
Place	Easy	Slightly Difficult	Moderately Difficult	Difficult	Don't Know	Missing	Total
Parks, playgrounds or other green spaces	33	8	1	0	4	1	52
Public Libraries	31	10	3	0	3	3	52
Supermarkets or grocery stores	43	3	3	3	2	1	52
Pharmacies	41	6	1	1	2	2	52
Banks and credit unions	38	6	4	4	2	2	52
Churches, mosques, synagogues , or other religious or cultural centers	37	8	2	2	3	1	52
Community center or recreational facilities	37	6	2	2	2	2	52
Places with jobs that l/my household would want to have	22	4	1	1	5	6	52
If household with a disability, ease of getting around your neighborhood/housing complex	1	0	1	1	0	50	52

Some 20 respondents stated that their community needs better jobs and 29 indicated the need for more jobs. Some 24 respondents indicated the need for more affordable housing, while 22 indicated the need for better roads.

<b>Table IV.86</b> <b>What Does your Community Need Most?</b> Starkville city Fair Housing Survey	
Percent	Responses
Better Jobs	20
More Jobs	29
Better Medical Services	17
Better Housing	18
More Affordable Housing	24
Housing Rehab	11
Better Educational Opportunities	11
Good Grocery Stores	15
Better Roads	22
Better Sidewalks	17
Better Public Safety	9
Water and Sewer Improvements	14
More Services	7
Other, please specify	5

Respondents indicated that 46 percent of funds should be used for housing, 15 percent for community facilities, and 13 percent for infrastructure.

<b>Table IV.87</b> <b>If you had some money to spend on these activities, what percentage would you spend on:</b> Starkville city Fair Housing Survey	
<b>Percent</b>	<b>Responses</b>
Housing	46
Community Facilities	15
Economic Development	13
Human Services	13
Infrastructure	13
<b>Total</b>	<b>100.0%</b>

## CURRENT HOUSING

The fair housing survey also asked questions about the respondents' current housing situation. Some 48 respondents rent from a housing authority, 0 rent from a private landlord, and 2 own.

<b>Table IV.88</b> <b>Do you currently rent you home, own your home or something else?</b> Starkville city Fair Housing Survey	
<b>Own/Rent</b>	<b>Responses</b>
Rent from the Housing Authority	48
Rent from a private landlord	0
Rent a room	0
Renter: share a room	0
Own	2
Owner: share a room	0
Something else	1
Missing	1
<b>Total</b>	<b>52</b>

Some 32 respondents are satisfied with their current housing situation, while 3 are dissatisfied.

<b>Table IV.89</b> <b>How Satisfied would you say you are with the quality of the housing you currently live in?</b> Starkville city Fair Housing Survey	
<b>Satisfaction</b>	<b>Responses</b>
Satisfied	32
Somewhat satisfied	8
Somewhat dissatisfied	7
Dissatisfied	3
Don't know	0
Missing	2
<b>Total</b>	<b>52</b>

In the past five years, 3 respondents have had their rent paid by a rental assistance program, as seen in the following table.

<b>Table IV.90</b> <b>In the past five years has your rent been paid by a rental assistance program?</b> Starkville city Fair Housing Survey	
<b>Own/Rent</b>	<b>Responses</b>
Yes	3
No	40
Don't know	8
Missing	1
<b>Total</b>	<b>52</b>

If respondents answered yes the previous question, some 0 respondents have indicated they have had difficulty using their Section 8 voucher.

<b>Table IV.91</b> <b>If you answered "Yes" to the above question have you had difficulty using that Section 8 voucher?</b> Starkville city Fair Housing Survey	
<b>Own/Rent</b>	<b>Responses</b>
Yes	0
No	17
Don't know	8
Missing	27
<b>Total</b>	<b>52</b>

During the past three years, some 8 respondents have indicated that their housing costs have increased a lot, and increased somewhat for 16 respondents.



<b>Table IV.92</b> <b>During the past three years, how have the overall housing costs for your current home changed?</b> Starkville city Fair Housing Survey	
<b>Change in housing cost</b>	<b>Responses</b>
Increased a lot	8
Increased some	16
Stayed about the same	11
Decreased some	2
Decreased a lot	2
Not applicable	9
Missing	4
<b>Total</b>	<b>52</b>

Some 2 respondents have been displaced this year as a renter, and 0 have been displaced as an owner. If respondents had been displaced, some 0 indicated it was due to the property being purchased, and 1 indicated it was due to the property being demolished.

<b>Table IV.93</b> <b>If you answered “Yes” to the above question was this the result of the property being:</b> Starkville city Fair Housing Survey	
<b>Reason</b>	<b>Responses</b>
Purchased	0
Demolished	1
Improved/renovated	1
Foreclosed	0
Other	3
Missing	47
<b>Total</b>	<b>52</b>

During the past five years, 8 respondents have looked for a new place to rent and 6 have looked for a home to buy.

<b>Table IV.94</b> <b>During the past five years, have you</b> <b>looked for a new place to live?</b> Starkville city Fair Housing Survey	
<b>Yes/No</b>	<b>Responses</b>
Yes, looked for a home to rent	8
Yes, looked for a home to buy	6
No	27
Don't remember	1
Missing	10
<b>Total</b>	<b>52</b>

If the respondent has looked for a new place to live, some 8 found it difficult to find safe, quality housing that they could afford in a neighborhood they wanted to live in.

<b>Table IV.95</b> <b>If you answered “Yes” to the above question</b> <b>did you have trouble finding safe, quality</b> <b>housing that you could afford in a</b> <b>neighborhood you would like to live in?</b> Starkville city Fair Housing Survey	
<b>Property</b>	<b>Responses</b>
Yes, looked for a home to rent	8
No	11
Don't remember	6
Missing	27
<b>Total</b>	<b>52</b>

If the respondent could not find safe, affordable housing, they indicated what reasons they thought it was because. The results are shown in the table on the following page.

<b>Table IV.96</b> <b>If you could not find safe, affordable, quality housing do you think it was because (Check all that apply):</b> Starkville city Fair Housing Survey	
<b>Category</b>	<b>Responses</b>
Race/ethnicity	0
Religion	0
Disability	3
Sexual Orientation	0
Pregnant or having children	0
Sex/Gender	0
Age	0
Marital Status	0
National Origin	0
Ancestry	0
Familial Status	0
Criminal History/Record	0
Source of income	4

If respondents felt they had been discriminated against in their housing access due to any of the following issues, such as race/ethnicity, religion, or disability, they were able to indicate in the survey. The results are shown in the table below.

<b>Table IV.97</b> <b>Do you believe that you have been discriminated against in your housing because of any of the following (Check all that apply):</b> Starkville city Fair Housing Survey	
<b>Category</b>	<b>Responses</b>
Race/ethnicity	0
Religion	0
Disability	0
Sexual Orientation	0
Pregnant or having children	0
Sex/Gender	0
Age	1
Marital Status	0
National Origin	0
Ancestry	0
Familial Status	0
Criminal History/Record	0
Source of income	0

Some 0 respondents have complained of discrimination by their landlord, and 2 were satisfied with the outcome.

<b>Table IV.98</b> <b>Fair Housing Complaints</b> Starkville city Fair Housing Survey						
Complaints	Yes	No	Don't Know	Does Not Apply	Missing	Total
If you have ever been discriminated by your landlord, did you complain?	0	9	0	14	29	52
Were you satisfied with the outcome?	2	1	0	17	32	52

If a respondent has filed a fair housing complaint, they were asked to indicate which agency they filed with. The results are shown in the table below.

<b>Table IV.99</b> <b>If you ever filed a fair housing complaint with an agency which one (Check all that apply):</b> Starkville city Fair Housing Survey	
Complaint Agency	Responses
Gulf Coast Fair Housing Center	0
HEED	0
U.S. Department of Housing and Urban Development (HUD)	1

In the past five years, some 4 respondents have applied for a home loan to purchase a home, refinance, or take equity out of their home. Some 5 respondents indicated that their application was approved.

<b>Table IV.100</b> <b>Home loan Applications</b> Starkville city Fair Housing Survey							
Applications	Yes	No	Don't Know	Does Not Apply	Other	Missing	Total
During the past five years have you applied for a loan to purchase a home, to refinance your mortgage, or take equity out of your home?	4	16	0	7	.	25	52
Was the application you made during the past five years approved?	5	4	1	11	0	31	52

If the respondent had not been approved for a home loan, some 8 respondents indicated it was due to their income level, and 5 respondents indicated it was due to their credit history or credit scores.

<b>Table IV.101</b> <b>If you have ever applied for a home loan and your application was NOT approved, which of the following reasons were you given? (Check all that apply):</b> Starkville city Fair Housing Survey	
<b>Reason</b>	<b>Responses</b>
My/our income level	8
The amount I/we had for a down payment	1
How much savings I/we had	0
The value of my property	0
My/our credit history or credit score(s)	5

Respondents indicated which issues limited their housing options. Some 11 indicated what they could afford to pay, and 5 indicated the amount of money they had for the deposit was too low.

<b>Table IV.102</b> <b>Which of the following issues, if any, limited the housing options you were able to consider (Check all that apply):</b> Starkville city Fair Housing Survey	
<b>Issue</b>	<b>Responses</b>
What I/we could afford to pay our rent or mortgage	11
The amount of money I/we had for deposit is too low	5
Housing large enough for my/our household	1
My/our credit history or credit score	7
Units that accommodate my/our disability (i.e. wheelchair accessible)	1
Not being shown housing in the neighborhood(s) I wanted to move into	2
Concern that I/we would not be welcome in a particular neighborhood(s)	0

## ABOUT YOU AND YOUR HOUSEHOLD

Survey respondents were asked a series of questions about their households. The responses to this section are included on the following pages. Some 21 respondents have someone in their household with a disability, and 2 have problems within their home that create any physical/accessibility issues for a member of the household. Some 23 respondents are aware of their right to request from their landlord a change in rules or policies or a physical change to make their home more accessible if necessary due to a disability.

<b>Table IV.103</b> <b>Disability and Accommodation</b> Starkville city Fair Housing Survey					
<b>Disability &amp; Accommodation Question</b>	<b>Yes</b>	<b>No</b>	<b>Don't Know</b>	<b>Missing</b>	<b>Total</b>
Are you, or someone else in your household, living with a disability?	21	25	0	5	52
Are there any problems within your home that create any physical/accessibility issues for yourself or a family member?	2	34	2	8	52
Are you aware of your right to request from your landlord , a change in rules or policies and your right to request a physical change to your housing to make your home more accessible if necessary due to a disability?	23	9	7	5	52
Have you made a request for reasonable accommodation?	3	31	3	8	52

If the household has made a request for a reasonable accommodation, the respondent indicated what type of accommodation was requested. The results are shown in the table on the following page.

<b>Table IV.104</b> <b>If you made a request for a reasonable accommodation, what type of accommodation did you request?</b> Starkville city Fair Housing Survey	
<b>Accommodation</b>	<b>Responses</b>
Assistance animal	0
Live in attendant	0
Modification of unit	0
Size of unit	0
Accessibility of unit	1
Change in rent due data	0
Transfer to another unit	1
Parking/parking space related	0
Other	1
Missing	49
<b>Total</b>	<b>52</b>

Some 3 respondents were satisfied with the outcome of their request for accommodation or modification, and 1 were not.

<b>Table IV.105</b> <b>Where you satisfied with the outcome of your accommodation and/or modification request?</b> Starkville city Fair Housing Survey	
<b>Yes/No</b>	<b>Responses</b>
Yes	3
No	1
Don't know	4
Missing	44
<b>Total</b>	<b>52</b>

The level of education and current employment status for respondents is shown in the following tables.

<b>Table IV.106</b> <b>What is the highest level of school that you have completed?</b> Starkville city Fair Housing Survey	
<b>Education</b>	<b>Responses</b>
Grade school or some high school	13
High school degree or equivalent	16
Completed vocational/technical school	3
Some college but no degree	14
Bachelor's degree	2
Master's degree or higher	0
Missing	4
<b>Total</b>	<b>52</b>

<b>Table IV.107</b> <b>Which of the following describes your current status?</b> Starkville city Fair Housing Survey	
<b>Employment</b>	<b>Responses</b>
Employed full-time	7
Employed part-time	8
Unemployed and looking for work	2
Unemployed and not looking for work	0
Unable to work due to a disability	21
Stay-at-home caregiver or parent	0
Retired	8
Student	1
Other	1
Missing	4
<b>Total</b>	<b>52</b>

Some 5 respondents have been homeless. If the respondent has ever been homeless, respondents indicated what led to their homelessness.

<b>Table IV.108</b> <b>Have you ever been homeless?</b> Starkville city Fair Housing Survey	
<b>Yes/No</b>	<b>Responses</b>
Yes	5
No	44
Don't know	0
Does not apply	1
Missing	2
<b>Total</b>	<b>52</b>

<b>Table IV.109</b> <b>If you have been homeless, what led to your homelessness?</b> Starkville city Fair Housing Survey	
<b>Reason</b>	<b>Responses</b>
Loss of your job	1
Illness/hospitalization	1
Eviction	1
Jail/prison	0
Substance abuse issue	0
Other	1
Missing	48
<b>Total</b>	<b>52</b>

Some 51 respondents use English as their primary language at home, while 0 respondents use Spanish, and 0 respondents use another language.

<b>Table IV.110</b> <b>What is the primary language you use at home?</b> Starkville city Fair Housing Survey	
<b>Language</b>	<b>Responses</b>
English	51
Spanish	0
Other	0
Missing	1
<b>Total</b>	<b>52</b>

If respondents requested their lease in their primary language, some 24 respondents indicated they received it.



<b>Table IV.111</b> <b>If you requested your lease agreement or other important documents in your primary language we they provided?</b> Starkville city Fair Housing Survey	
<b>Yes/No</b>	<b>Responses</b>
Yes	24
No	2
Did not request	18
Missing	8
<b>Total</b>	<b>52</b>

Some 37 respondents have been able to communicate with their landlord, while 37 respondents have not.

<b>Table IV.112</b> <b>Have you been able to communicate with your landlord?</b> Starkville city Fair Housing Survey	
<b>Yes/No</b>	<b>Responses</b>
Yes	37
No	5
Did not request	1
Missing	9
<b>Total</b>	<b>52</b>

Some 1 respondents are Hispanic and 40 respondents are not. As for race, some 4 respondents are white and 47 are black. These data are shown in the following two tables.

<b>Table IV.113</b> <b>Do you consider yourself Hispanic, Latino, Latina or of Spanish origin?</b> Starkville city Fair Housing Survey	
<b>Yes/No</b>	<b>Responses</b>
Yes, Hispanic/Latino/Latina, or of Spanish origin	1
No, not of Hispanic/Latino/Latina, or of Spanish	40
Missing	11
<b>Total</b>	<b>52</b>

Some 9 respondents were male and 42 were female.

<b>Table IV.114</b> <b>What is your Gender?</b> Starkville city Fair Housing Survey	
<b>Gender</b>	<b>Responses</b>
Male	9
Female	42
Missing	1
<b>Total</b>	<b>52</b>

The respondents' household incomes are shown in the following table.

<b>Table IV.115</b> <b>What was your household income in 2017</b> Starkville city Fair Housing Survey	
<b>Income</b>	<b>Responses</b>
Less than \$10,000	21
\$10,001 to \$20,000	9
\$20,001 to \$30,000	0
\$30,001 to \$50,000	0
\$30,001 to \$50,000	1
\$50,001 to \$100,000	0
\$100,001 to \$200,000	0
More than \$200,000	0
Missing	21
<b>Total</b>	<b>52</b>

## ***SECTION V. FAIR HOUSING GOALS AND PRIORITIES***

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

1. The Fair Housing Act,
2. The Housing Amendments Act, and
3. The Americans with Disabilities Act.

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

### **ASSESSING FAIR HOUSING**

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

In 1994, HUD published a rule consolidating plans for housing and community development programs into a single planning process. This action grouped the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grants (ESG)<sup>164</sup>, and Housing Opportunities for Persons with AIDS (HOPWA) programs into the Consolidated Plan for Housing and Community Development, which then created a single application cycle. As a part of the consolidated planning process, and entitlement communities that receive such funds from HUD are required to submit to HUD certification that they are affirmatively furthering fair housing (AFFH). This was described in the Analysis of Impediments to Fair Housing Choice and a Fair Housing Planning Guide offering methods to conduct such a study was released in March of 1993.

In 2015, HUD released a new AFFH rule, which gave a format, a review process, and content requirements for the newly named "Assessment of Fair Housing", or AFH. The assessment would now include an evaluation of equity, the distribution of community assets, and access to opportunity within the community, particularly as it relates to concentrations of poverty among minority racial and ethnic populations. Areas of opportunity are physical places, areas within communities that provide things one needs to thrive, including quality employment, high performing schools, affordable housing, efficient public transportation, safe streets, essential services, adequate parks, and full-service grocery stores. Areas lacking opportunity, then, have the opposite of these attributes.

The AFH would also include measures of segregation and integration and provide some historical context about how such concentrations became part of the community's legacy.

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<sup>164</sup> The Emergency Shelter Grants program was renamed the Emergency Solutions Grants program in 2011.

Together, these considerations were then intended to better inform public investment decisions that would lead to amelioration or elimination of such segregation, enhancing access to opportunity, promoting equity, and hence housing choice. Equitable development requires thinking about equity impacts at the front end, prior to the investment occurring. That thinking involves analysis of economic, demographic, and market data to evaluate current issues for citizens who may have previously been marginalized from the community planning process. All this would be completed by using an on-line Assessment Tool.

However, on January 5, 2018, HUD issued a notice that extended the deadline for submission of an AFH by local government consolidated plan program participants to their next AFH submission date that falls after October 31, 2020. Then, on May 18, 2018, HUD released three notices regarding the AFFH; one eliminated the January 5, 2018, guidance; a second withdrew the on-line Assessment Tool for local government program participants; and, the third noted that the AFFH certification remains in place. HUD went on to say that the AFFH databases and the AFFH Assessment Tool guide would remain available for the AI; and, encouraged jurisdictions to use them, if so desired.

Hence, the AI process involves a thorough examination of a variety of sources related to housing, the fair housing delivery system, housing transactions, locations of public housing authorities, areas having racial and ethnic concentrations of poverty and access to opportunity. The development of an AI also includes public input, and interviews with stakeholders, public meetings to collect input from citizens and interested parties, distribution of draft reports for citizen review, and formal presentations of findings and impediments, along with actions to overcome the identified fair housing issues/impediments.

In accordance with the applicable statutes and regulations governing the Consolidated Plan, Starkville city certifies that they will affirmatively further fair housing, by taking appropriate actions to overcome the effects of any impediments identified in the Analysis of Impediments to Fair Housing Choice, and maintaining records that reflect the analysis and actions taken in this regard.

## OVERVIEW OF FINDINGS

As a result of detailed demographic, economic, and housing analysis, along with a range of activities designed to foster public involvement and feedback Starkville city has identified a series of fair housing issues/impediments, and other contributing factors that contribute to the creation or persistence of those issues.

Table V.1, on the following page, provides a list of the contributing factors that have been identified as causing these fair housing issues/impediments and prioritizes them according to the following criteria:

1. High: Factors that have a direct and substantial impact on fair housing choice
2. Medium: Factors that have a less direct impact on fair housing choice, or that Starkville city has limited authority to mandate change.
3. Low: Factors that have a slight or largely indirect impact on fair housing choice, or that Starkville city has limited capacity to address.

<b>Table V.1 Contributing Factors</b>		
<b>Contributing Factors</b>	<b>Priority</b>	<b>Justification</b>
Discriminatory patterns in lending	High	Minority households tend to have higher rates of mortgage denials than white households, as seen in 2008-2016 HMDA data.
Failure to make reasonable accommodation	High	HUD Fair Housing Complaint data suggests that failure to make reasonable accommodation was the most cited issue for complaints statewide.
Lack of access to housing for homeless and released from incarceration	Medium	Public input and the homeless and vulnerable population analysis revealed that homeless, persons recently released from incarceration, and transition-age foster youth have limited access to housing option throughout the State.
Lack of access to independence for persons with disabilities	High	Public input, the Disability and Access workgroup, and the Disability and Access Analysis revealed that households with disabilities have limited access to options that increase their independence.
Lack of opportunities for persons to obtain housing in higher opportunity areas	High	Access to higher opportunity areas is limited for many households due to income, transportation, and a variety of factors.
Moderate to high levels of segregation	High	The dissimilarity index shows a moderate to high level of segregation for minority households.
Lack of resources	High	Lack of resources continues to be a high rated contributing factor, as noted by Stakeholder Consultation meetings and public input.
Insufficient affordable housing in a range of unit sizes	High	The prevalence of cost burden, especially for lower income households, demonstrates the continued need for affordable housing options in a range of unit sizes.
Insufficient accessible affordable housing	High	The Disability and Access workgroup and Disability and Access analysis, coupled with a high disability rate particularly for the elderly population, demonstrated a lack of accessible affordable housing to meet current and future demand.
Lack of fair housing structure	High	Fair housing survey results and public input indicated a lack of fair housing structure.
Insufficient fair housing education	High	Fair housing survey results and public input indicated a continued need for fair housing education.
Insufficient understanding of credit	High	Fair housing survey results and public input indicated an insufficient understanding of credit.

## ADDITIONAL FINDINGS

In addition to the table above, there are several significant findings or conclusions summarized here. Black and Hispanic households have a moderate level of segregation. Other racial groups also have a moderate to high level of segregation, but these households represent a small proportion of the population. There are no R/ECAPs in Starkville currently. There is little disparity in access to opportunity by race and ethnicity.

## FAIR HOUSING ISSUES, CONTRIBUTING FACTORS, AND PROPOSED ACHIEVEMENTS

The Table V.2, on the following page, summarizes the fair housing issues/impediments and contributing factors. It includes metrics and milestones and a timeframe for achievements.

Table V.2			
Fair Housing Issues, Contributing Factors, and Recommended Actions			
Fair Housing Issues/ Impediments	Contributing Factors	Recommended Actions to be Taken	Responsible Agency
Segregation	Moderate to high levels of segregation	Review location of public housing stock and relocate to low poverty areas each year	Starkville Housing Authority
Disparities in Access to Opportunity	<p>Discriminatory patterns in lending</p> <p>Discriminatory terms/conditions</p> <p>Lack of access to housing for homeless and released from incarceration</p> <p>Lack of access to independence for persons with disabilities</p> <p>Lack of opportunities for persons to obtain housing in higher opportunity areas</p>	<p>Consult with local transportation agencies to increase access to transit options for persons in high poverty areas, annually</p> <p>Consult with local school district about increased access to proficient schools for public housing residents annually</p> <p>Coordinate local efforts to increase access for homeless households to publicly supported housing annually</p> <p>Continue to receive referrals annually to house homeless families and provide case management for these families to remain housed</p> <p>Conduct mobility workshops with various partnering agencies for annually. Keep record of workshops</p> <p>Enhance and continue resident services programs for all residents, including specialized programs for youth annually.</p> <p>Provide computer classes/labs, afterschool programs for youth, financial literacy, nutrition workshops, and enrichment activities annually</p>	Starkville Housing Authority
Disproportionate Housing Needs	<p>Insufficient affordable housing in a range of unit sizes</p> <p>Discriminatory patterns in lending</p> <p>Lack of Resources</p>	<p>Continue the use of Housing Choice vouchers and encourage the development of 10 units of affordable housing sites outside high poverty areas each year</p> <p>Review location of public housing stock and relocate to low poverty areas each year</p>	Starkville Housing Authority

Publicly Supported Housing	<p>Insufficient affordable housing in a range of unit sizes</p> <p>Insufficient accessible affordable housing</p> <p>Lack of Resources</p>	<p>Increase the availability of public housing units outside high poverty areas, add 100 publicly supported housing units over the course of five (5) years</p> <p>Research and seek out additional funding opportunities for public housing options annually</p>	Starkville Housing Authority
Disability and Access	<p>Insufficient accessible affordable housing</p>	<p>Increase the availability of public housing accessible units through the encouragement of accessible units in all new and renovated housing developments, add 10 new accessible units over the course of five (5) years</p>	Starkville Housing Authority
Fair Housing Enforcement and Outreach	<p>Lack of fair housing structure</p> <p>Insufficient fair housing education</p> <p>Insufficient understanding of credit</p>	<p>Promote fair housing education through annual or biannual workshops</p> <p>Promote outreach and education related to financial literacy for public housing residents</p> <p>Conduct financial literacy for senior high school students on an annual basis</p>	Starkville Housing Authority

## SECTION VI. APPENDICES

### A. ADDITIONAL PLAN DATA

<b>Table VI.1</b> <b>Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant</b> Starkville city 2008–2017 HMDA Data												
<b>Race</b>		<b>2008</b>	<b>2009</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>Total</b>
American Indian	Originated	0.0	1.0	0.0	1.0	0.0	1.0	0.0	1.0	0.0	2.0	6.0
	Denied	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.0	1.0
	Denial Rate	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	33.3%	14.3%
Asian	Originated	4.0	14.0	6.0	4.0	8.0	8.0	9.0	9.0	6.0	15.0	83
	Denied	0.0	0.0	0.0	1.0	0.0	0.0	1.0	0.0	1.0	1.0	4.0
	Denial Rate	0.0%	0.0%	0.0%	20.0%	0.0%	0.0%	10.0%	0.0%	14.3%	6.2%	4.6%
Black	Originated	12	16	12	12	11	3	10	11	16	11	114
	Denied	4	4	4.0	3.0	3.0	4	2.0	2	2	3	31
	Denial Rate	25.0%	20.0%	25.0%	20.0%	21.4%	57.1%	16.7%	15.4%	11.1%	21.4%	21.4%
Pacific Islander	Originated	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	Denied	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	Denial Rate	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
White	Originated	158	146	110	102	141	145	124	157	156	132	1,371
	Denied	13	16	9	12	6	11	12	5	16	10	110
	Denial Rate	7.6%	9.9%	7.6%	10.5%	4.1%	7.1%	60.0%	3.1%	9.3%	7.0%	7.4%
Not Available	Originated	5.0	5.0	5.0	1.0	0.0	2.0	2.0	5.0	6.0	5.0	36
	Denied	5.0	1.0	1.0	2.0	2.0	3.0	3.0	0.0	0.0	1.0	18
	Denial Rate	50.0%	16.7%	16.7%	66.7%	100.0%	60.0%	60.0%	0.0%	0.0%	16.7%	33.3%
Not Applicable	Originated	1.0	0.0	0.0	0.0	1.0	0.0	0.0	0.0	0.0	0.0	2.0
	Denied	1.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.0
	Denial Rate	50.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	33.3%
<b>Total</b>	<b>Originated</b>	<b>180</b>	<b>182</b>	<b>133</b>	<b>120</b>	<b>161</b>	<b>159</b>	<b>145</b>	<b>183</b>	<b>184</b>	<b>165</b>	<b>1,612</b>
	<b>Denied</b>	<b>23</b>	<b>21</b>	<b>14</b>	<b>18</b>	<b>11</b>	<b>18</b>	<b>18</b>	<b>7</b>	<b>19</b>	<b>16</b>	<b>165</b>
	<b>Denial Rate</b>	<b>11.3%</b>	<b>10.3%</b>	<b>9.5%</b>	<b>13.0%</b>	<b>6.4%</b>	<b>10.2%</b>	<b>11.0%</b>	<b>3.7%</b>	<b>9.4%</b>	<b>8.8%</b>	<b>9.3%</b>
Hispanic	Originated	2.0	0.0	2.0	3.0	1.0	2.0	3.0	6.0	1.0	1.0	21
	Denied	0.0	2.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	2.0
	Denial Rate	0.0%	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	8.7%
Non-Hispanic	Originated	172	175	128	116	158	154	142	172	178	160	1,555
	Denied	17	18	12	17	9	15	16	7	18	15	144
	Denial Rate	9.0%	9.3%	8.6%	12.8%	5.4%	8.9%	10.1%	3.9%	9.2%	8.6%	8.5%



**Table VI.2**  
**Loan Applications by Reason for Denial by Race/Ethnicity of Applicant**  
 Starkville city  
 2008–2017 HMDA Data

Denial Reason	American Indian	Asian	Black	Pacific Islander	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	0.0	0.0	5	0.0	20	1.0	0.0	26	0.0
Employment History	0.0	0.0	0.0	0.0	3.0	2.0	0.0	5.0	0.0
Credit History	0.0	0.0	11	0.0	15	3.0	0.0	29	0.0
Collateral	0.0	0.0	0.0	0.0	9	2.0	0.0	11	0.0
Insufficient Cash	0.0	0.0	1.0	0.0	2.0	0.0	0.0	3.0	0.0
Unverifiable Information	0.0	0.0	1.0	0.0	3.0	1.0	0.0	5.0	0.0
Credit Application Incomplete	0.0	2.0	2.0	0.0	8	1.0	0.0	13	0.0
Mortgage Insurance Denied	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Other	0.0	0.0	1.0	0.0	6.0	2.0	0.0	9	0.0
Missing	1.0	2.0	10	0.0	44	6.0	1.0	64	2.0
<b>Total</b>	<b>1.0</b>	<b>4.0</b>	<b>31</b>	<b>0.0</b>	<b>110</b>	<b>18</b>	<b>1.0</b>	<b>165</b>	<b>1.0</b>
% Missing	100.0%	50.0%	32.3%	0.0%	40.0%	33.3%	100.0%	38.8%	2.0%

**Table VI.3**  
**Denial Rates by Gender of Applicant**  
 Starkville city  
 2008–2017 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2008	8.0%	11.6%	62.5%	50.0%	11.3%
2009	8.7%	13.3%	20.0%	0.0%	10.3%
2010	5.0%	17.1%	40.0%	0.0%	9.5%
2011	12.7%	11.8%	50.0%	0.0%	13.0%
2012	5.7%	4.3%	100.0%	0.0%	6.4%
2013	10.4%	5.3%	50.0%	0.0%	10.2%
2014	7.1%	18.4%	100.0%	0.0%	11.0%
2015	3.7%	3.9%	0.0%	0.0%	3.7%
2016	9.2%	11.1%	0.0%	0.0%	9.4%
2017	8.6%	8.5%	16.7%	0.0%	8.8%
<b>Average</b>	<b>7.9%</b>	<b>10.5%</b>	<b>34.1%</b>	<b>33.3%</b>	<b>9.3%</b>

**Table VI.4**  
**Loan Applications by Selected Action Taken by Gender of Applicant**  
 Starkville city  
 2008–2017 HMDA Data

Gender		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
Male	Originated	138	126	96	89	115	121	105	129	138	117	1,174
	Denied	12	12	5	13	7	14	8	5	14	11	101
	Denial Rate	8.0%	8.7%	5.0%	12.7%	5.7%	10.4%	7.1%	3.7%	9.2%	8.6%	7.9%
Female	Originated	38	52	34	30	45	36	40	49	40	43	407
	Denied	5	8	7	4	2	2	9.0	2	5	4	48
	Denial Rate	11.6%	13.3%	17.1%	11.8%	4.3%	5.3%	18.4%	3.9%	11.1%	8.5%	10.5%
Not Available	Originated	3.0	4.0	3.0	1.0	0.0	2.0	0.0	5.0	6.0	5.0	29
	Denied	5.0	1.0	2.0	1.0	2.0	2.0	1.0	0.0	0.0	1.0	15
	Denial Rate	62.5%	20.0%	40.0%	50.0%	100.0%	50.0%	100.0%	0.0%	0.0%	16.7%	34.1%
Not Applicable	Originated	1.0	0.0	0.0	0.0	1.0	0.0	0.0	0.0	0.0	0.0	2.0
	Denied	1.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.0
	Denial Rate	50.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	33.3%
Total	Originated	180	182	133	120	161	159	145	183	184	165	1,612
	Denied	23	21	14	18	11	18	18	7	19	16	165
	Denial Rate	11.3%	10.3%	9.5%	13.0%	6.4%	10.2%	11.0%	3.7%	9.4%	8.8%	9.3%

**Table VI.5**  
**Denial Rates by Income of Applicant**  
 Starkville city  
 2008–2017 HMDA Data

Income	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
\$30,000 or Below	43.8%	22.2%	40.0%	26.7%	6.7%	37.5%	54.5%	16.7%	22.2%	18.2%	29.0%
\$30,001–\$50,000	13.2%	15.2%	11.9%	17.9%	15.2%	6.5%	12.1%	4.9%	14.7%	18.2%	12.6%
\$50,001–\$75,000	8.3%	8.2%	0.0%	11.6%	6.5%	7.1%	7.0%	1.9%	10.2%	8.3%	7.1%
\$75,001–\$100,000	8.0%	8.3%	3.8%	16.7%	5.0%	20.0%	6.1%	0.0%	6.2%	7.1%	7.8%
\$100,001–\$150,000	4.4%	3.4%	12.5%	5.0%	0.0%	6.9%	7.1%	3.3%	0.0%	5.7%	4.2%
Above \$150,000	7.1%	8.7%	0.0%	0.0%	5.6%	0.0%	0.0%	8.3%	4.3%	3.1%	4.2%
Data Missing	20.0%	0.0%	0.0%	0.0%	0.0%	25.0%	100.0%	0.0%	60.0%	20.0%	22.6%
Total	11.3%	10.3%	9.5%	13.0%	6.4%	10.2%	11.0%	3.7%	9.4%	8.8%	9.3%

**Table VI.6**  
**Loan Applications by Income of Applicant: Originated and Denied**  
 Starkville city  
 2008–2017 HMDA Data

Income		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
\$30,000 or Below	Loan Originated	9	14	9	11	14	5	5	5	7	9	88
	Application Denied	7	4	6	4.0	1.0	3.0	6.0	1.0	2.0	2.0	36
	Denial Rate	43.8%	22.2%	40.0%	26.7%	6.7%	37.5%	54.5%	16.7%	22.2%	18.2%	29.0%
\$30,001 –\$50,000	Loan Originated	33	39	37	23	28	29	29	39	29	18	304
	Application Denied	5	7	5	5.0	5.0	2	4.0	2.0	5	4	44
	Denial Rate	13.2%	15.2%	11.9%	17.9%	15.2%	6.5%	12.1%	4.9%	14.7%	18.2%	12.6%
\$50,001 –\$75,000	Loan Originated	55	56	39	38	43	52	40	52	53	44	472
	Application Denied	5.0	5.0	0.0	5.0	3.0	4.0	3.0	1.0	6.0	4.0	36
	Denial Rate	8.3%	8.2%	0.0%	11.6%	6.5%	7.1%	7.0%	1.9%	10.2%	8.3%	7.1%
\$75,001 – \$100,000	Loan Originated	23	22	25	15	19	24	31	33	30	26	248
	Application Denied	2.0	2.0	1.0	3.0	1.0	6.0	2.0	0.0	2.0	2.0	21
	Denial Rate	8.0%	8.3%	3.8%	16.7%	5.0%	20.0%	6.1%	0.0%	6.2%	7.1%	7.8%
\$100,001 –\$150,000	Loan Originated	43	28	14	19	34	27	26	29	41	33	294
	Application Denied	2.0	1.0	2.0	1.0	0.0	2.0	2.0	1.0	0.0	2.0	13
	Denial Rate	4.4%	3.4%	12.5%	5.0%	0.0%	6.9%	7.1%	3.3%	0.0%	5.7%	4.2%
Above \$150,000	Loan Originated	13.0	21.0	9.0	14.0	17.0	19	14	22	22	31	182
	Application Denied	1.0	2.0	0.0	0.0	1.0	0.0	0.0	2.0	1.0	1.0	8
	Denial Rate	7.1%	8.7%	0.0%	0.0%	5.6%	0.0%	0.0%	8.3%	4.3%	3.1%	4.2%
Data Missing	Loan Originated	4.0	2.0	0.0	0.0	6.0	3.0	0.0	3.0	2.0	4.0	24
	Application Denied	1.0	0.0	0.0	0.0	0.0	1.0	1.0	0.0	3.0	1.0	7.0
	Denial Rate	20.0%	0.0%	0.0%	0.0%	0.0%	25.0%	100.0%	0.0%	60.0%	20.0%	22.6%
<b>Total</b>	<b>Loan Originated</b>	<b>180</b>	<b>182</b>	<b>133</b>	<b>120</b>	<b>161</b>	<b>159</b>	<b>145</b>	<b>183</b>	<b>184</b>	<b>165</b>	<b>1,612</b>
	<b>Application Denied</b>	<b>23</b>	<b>21</b>	<b>14</b>	<b>18</b>	<b>11</b>	<b>18</b>	<b>18</b>	<b>7</b>	<b>19</b>	<b>16</b>	<b>165</b>
	<b>Denial Rate</b>	<b>11.3%</b>	<b>10.3%</b>	<b>9.5%</b>	<b>13.0%</b>	<b>6.4%</b>	<b>10.2%</b>	<b>11.0%</b>	<b>3.7%</b>	<b>9.4%</b>	<b>8.8%</b>	<b>9.3%</b>

**Table VI.7**  
**Denial Rates of Loans by Race/Ethnicity and Income of Applicant**  
 Starkville city  
 2008–2017 HMDA Data

<b>Race</b>	<b>\$30,000 or Below</b>	<b>\$30,001 – \$50,000</b>	<b>\$50,001 –\$75,000</b>	<b>\$75,001 –\$100,000</b>	<b>\$100,001 –\$150,000</b>	<b>&gt; \$150,000</b>	<b>Data Missing</b>	<b>Average</b>
American Indian	0.0%	50.0%	0.0%	0.0%	0.0%	0.0%	0.0%	14.3%
Asian	20.0%	0.0%	6.1%	5.0%	0.0%	0.0%	0.0%	4.6%
Black	53.3%	17.0%	19.5%	23.5%	14.3%	10.0%	0.0%	21.4%
Pacific Islander	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
White	22.9%	11.1%	5.3%	5.9%	4.0%	3.6%	20.0%	7.4%
Not Available	71.4%	37.5%	25.0%	33.3%	10.0%	33.3%	100.0%	33.3%
Not Applicable	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	50.0%	33.3%
<b>Average</b>	<b>29.0%</b>	<b>12.6</b>	<b>7.1%</b>	<b>7.8%</b>	<b>4.2%</b>	<b>4.2%</b>	<b>22.6%</b>	<b>9.3%</b>
Non-Hispanic	0.0%	33.3	0.0%	0.0%	0.0%	0.0%	0.0%	8.7%
Hispanic	27.8%	11.4	6.6%	7.0%	4.1%	3.8%	17.9%	8.5%

**Table VI.8**  
**Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied**  
 Starkville city  
 2008–2017 HMDA Data

Race		\$30,000 or Below	\$30,001 – \$50,000	\$50,001 –\$75,000	\$75,001 –\$100,000	\$100,001 –\$150,000	> \$150,000	Data Missing	Total
American Indian	Loan Originated	1.0	1.0	0.0	2.0	2.0	0.0	0.0	6.0
	Application Denied	0.0	1.0	0.0	0.0	0.0	0.0	0.0	1.0
	Denial Rate	0.0%	50.0%	0.0%	0.0%	0.0%	0.0%	0.0%	14.3%
Asian	Loan Originated	4.0	5.0	31.0	19.0	15.0	8.0	1.0	83
	Application Denied	1.0	0.0	2.0	1.0	0.0	0.0	0.0	4.0
	Denial Rate	20.0%	0.0%	6.1%	5.0%	0.0%	0.05	0.0%	4.6%
Black	Loan Originated	7	44	33	13	6	9.0	2.0	114
	Application Denied	8	9	8	4.0	1.0	1.0	0.0	31
	Denial Rate	53.3%	17.0%	19.5%	23.5%	14.3%	10.0%	0.0%	0.0%
Pacific Islander	Loan Originated	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	Application Denied	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	Denial Rate	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
White	Loan Originated	74	249	396	207	262	163	20	1,371
	Application Denied	22	31	22	13	11	6.0	5.0	110
	Denial Rate	22.9%	11.1%	5.3%	5.9%	4.0%	3.6%	20.0%	7.4%
Not Available	Loan Originated	2.0	5	12	6.0	9.0	2.0	0.0	36
	Application Denied	5.0	3.0	4.0	3.0	1.0	1.0	1.0	18
	Denial Rate	71.4%	37.5%	25.0%	33.3%	10.0%	33.3%	100.0%	33.3%
Not Applicable	Loan Originated	0.0	0.0	0.0	1.0	0.0	0.0	1.0	2.0
	Application Denied	0.0	0.0	0.0	0.0	0.0	0.0	1.0	1.0
	Denial Rate	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	50.0%	33.3%
<b>Total</b>	<b>Loan Originated</b>	<b>88</b>	<b>304</b>	<b>472</b>	<b>248</b>	<b>294</b>	<b>182</b>	<b>24</b>	<b>1,612</b>
	<b>Application Denied</b>	<b>36</b>	<b>44</b>	<b>36</b>	<b>21</b>	<b>13</b>	<b>8</b>	<b>7.0</b>	<b>165</b>
	<b>Denial Rate</b>	<b>29.0%</b>	<b>12.6%</b>	<b>7.1%</b>	<b>7.8%</b>	<b>4.2%</b>	<b>4.2%</b>	<b>22.6</b>	<b>9.3%</b>
Hispanic	Loan Originated	1.0	4	5.0	5.0	2.0	4.0	0.0	21
	Application Denied	0.0	2.0	0.0	0.0	0.0	0.0	0.0	2.0
	Denial Rate	0.0%	33.3%	0.0%	0.0%	0.0%	0.0%	0.0%	8.7%
Non-Hispanic	Loan Originated	83	296	456	238	283	176	23	1,555
	Application Denied	32	38	32	18	12	7.0	5.0	144
	Denial Rate	27.8%	11.4%	6.6%	7.0%	4.1%	3.8%	17.9%	8.5%

**Table VI.9**  
**Loans by HAL Status by Race/Ethnicity of Borrower**  
 Starkville city  
 2008–2017 HMDA Data

Race	Loan Type	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
American Indian	HAL	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	Other	0.0	1.0	0.0	1.0	0.0	1.0	0.0	1.0	0.0	2.0	4.0
	Percent HAL	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Asian	HAL	1.0	1.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	2.0
	Other	3.0	13.0	6.0	4.0	8.0	8.0	9.0	9.0	6.0	15.0	66
	Percent HAL	25.0%	7.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	2.9%
Black	HAL	0.0	1.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1
	Other	12	15	12	12	11	3	10	11	16	11	102
	Percent HAL	0.0%	6.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.0%
Pacific Islander	HAL	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	Other	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	Percent HAL	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
White	HAL	13	17	0.0	0.0	0.0	1.0	0.0	0.0	0.0	0.0	31
	Other	145	129	110	102	141	144	124	157	156	132	1,208
	Percent HAL	8.2%	11.6%	0.0%	0.0%	0.0%	0.7%	0.0%	0.0%	0.0%	0.0%	2.5%
Not Available	HAL	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	Other	5.0	5.0	5.0	1.0	0.0	2.0	2.0	5.0	6.0	5.0	102
	Percent HAL	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Not Applicable	HAL	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	Other	1.0	0.0	0.0	0.0	1.0	0.0	0.0	0.0	0.0	0.0	2.0
	Percent HAL	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>HAL</b>	<b>14</b>	<b>19</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>1.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>34</b>
	<b>Other</b>	<b>166</b>	<b>163</b>	<b>133</b>	<b>120</b>	<b>161</b>	<b>158</b>	<b>145</b>	<b>183</b>	<b>184</b>	<b>165</b>	<b>1,578</b>
	<b>Percent HAL</b>	<b>7.8%</b>	<b>10.4%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.6%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>2.1%</b>
Hispanic	HAL	1.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	19
	Other	1.0	0.0	2.0	3.0	1.0	2.0	3.0	6.0	1.0	1.0	1.0
	Percent HAL	50.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	5.0%
Non-Hispanic	HAL	13	18	0.0	0.0	0.0	1.0	0.0	0.0	0.0	0.0	1,363
	Other	159	157	128	116	158	153	142	172	178	160	32
	Percent HAL	7.6%	10.3%	0.0%	0.0%	0.0%	0.6%	0.0%	0.0%	0.0%	0.0%	2.3%

**Table VI.10**  
**Rates of HALs by Income of Borrower**  
 Starkville city  
 2008–2017 HMDA Data

Income	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Average
\$30,000 or Below	11.1%	21.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	5.1%
\$30,001–\$50,000	15.2%	12.8%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	3.5%
\$50,001–\$75,000	7.3%	3.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.4%
\$75,001–\$100,000	0.0%	4.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.5%
\$100,00–\$150,000	4.7%	10.7%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.9%
Above \$150,000	15.4%	14.3%	0.0%	0.0%	0.0%	5.3%	0.0%	0.0%	0.0%	0.0%	4.0%
Data Missing	0.0%	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	8.3%
<b>Average</b>	<b>7.8%</b>	<b>10.4%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.6%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>2.1%</b>

**Table IV.11**  
**Loans by HAL Status by Income of Borrower**  
 Starkville city  
 2008–2016 HMDA Data

Income		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
\$30,000 or Below	HAL	1.0	3.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	4
	Other	8	11	9	11	14	5	5	5	7	9	75
	Percent HAL	11.1%	21.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	5.1%
\$30,001 –\$50,000	HAL	5.0	5.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	10
	Other	28	34	37	23	28	29	29	39	29	18	276
	Percent HAL	15.2%	12.8%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	3.5%
\$50,001 –\$75,000	HAL	4.0	2.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	6
	Other	51	54	39	38	43	52	40	52	53	44	422
	Percent HAL	7.3%	3.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.4%
\$75,001 – \$100,000	HAL	0.0	1.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.0
	Other	23	21	25	15	19	24	31	33	30	26	221
	Percent HAL	0.0%	4.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.5%
\$100,001 –150,000	HAL	2.0	3.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	5.0
	Other	41	25	14	19	34	27	26	29	41	33	256
	Percent HAL	4.7%	10.7%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.9%
Above \$150,000	HAL	2.0	3.0	0.0	0.0	0.0	1.0	0.0	0.0	0.0	0.0	6.0
	Other	11.0	18.0	9.0	14.0	17.0	18.0	14	22	22	31	145
	Percent HAL	15.4%	14.3%	0.0%	0.0%	0.0%	5.3%	0.0%	0.0%	0.0%	0.0%	4.0%
Data Missing	HAL	0.0	2.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	2.0
	Other	4.0	0.0	0.0	0.0	6.0	3.0	0.0	3.0	2.0	4.0	22
	Percent HAL	0.0%	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	8.3%
<b>Total</b>	<b>Other</b>	<b>14</b>	<b>19</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>1.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>34</b>
	<b>HAL</b>	<b>166</b>	<b>163</b>	<b>133</b>	<b>120</b>	<b>161</b>	<b>158</b>	<b>145</b>	<b>183</b>	<b>184</b>	<b>165</b>	<b>1,578</b>
	<b>Percent HAL</b>	<b>7.8%</b>	<b>10.4%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.6%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>2.1%</b>

## B. PUBLIC INPUT DATA

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### Disability and Access Work Group 10/4/2018

**Comment:** We have many with Mental Illness; they are the ones who are losing housing. What can we do about that?

**Presenter:** I don't have all the answers. I am hoping you can offer some perspective and commentary about what we can do about that. We can certainly allocate more resources there. That would be one thing. Maybe we need to find out where the worst cases are so my question to you would be where are the most frequent cases where mental illness has robbed these people of their ability to get a home.

**Comment:** Is this data based on NON-institutionalized population, or the total? If it includes those in institutions, that might help explain concentrations if there is one in that region.

**Presenter:** It is the total. If it includes those in institutions it might help explain concentrations if there is one in that region. This is total population as according to the American Community Survey. So for those who were contacted it does include institutionalized populations for those who can communicate.

**Comment:** On the coast.

**Comment:** The lack of affordable housing leaves ex-offenders competing for the same limited resources with others who have no criminal history. Barriers to housing: age (below 21) Criminal record; HUD prioritizes chronic but if someone is in treatment or incarcerated for 60-90 days they are not considered chronic (but they Will BE). They may be incarcerated before trial but found not guilty at trial. It still knocks them off the chronic list.

**Presenter:** Thanks.

Presentation

**Comment:** Issue for those with mental disability is long-term support services once housed.

**Comment:** People with disabilities TEND to congregate in urban areas because of the "walkability" and access to public transit. It strikes me as odd that we don't see that pattern (at least at first blush). Why would that be?

**Presenter:** Some people do not access to services. They are unable to move. Beyond that I am not certain. This is partly for us to explore. Hopefully you can offer some perspective and commentary about that.

**Comment:** This jeopardizes housing.

Presentation

**Comment:** I live in Jackson and the answer is DEFINITELY NO. Even NEW construction is willfully avoiding building accessible units...exploiting loopholes in ADA requirements. WHY?



**Presenter:** That is a common problem throughout many of the jurisdictions in which we work. Sometimes it is related to government not having the skilled individuals who would inspect the property across many barriers, for example there was a client, we had one time several years ago, where the people who inspected the inside of the building were different than the people who inspected the outside of the building. The people who inspected the inside said it looks great, but the outside of the building for those who had an ambulatory disability there was difficulty, there was no ramp. It was like four or five steps up. It was built to code, but the inside was one set and the outside was a different set. So there could be challenges within the building codes and those who inspect the buildings. There could be places where people aren't doing it because the laws are not as enforced as they should be. I agree with you that there are challenges.

Presentation

**Comment:** For instance, I'm told that Federal Housing Tax Credits does NOT trigger the minimum 5% accessible unit requirement of the Rehab Act. This is a major problem and being exploited by certain developers.

**Presenter:** If this is true I am sure that it is being exploited. It should not be administered that way. Perhaps the Home Corp can respond.

**Comment:** The simple response to the last question is that developments are required to comply with ADA. I can't speak specifically off the top of my head to the rehab ADA requirement, but certainly new construction has to comply with Federal ADA requirements.

**Comment:** Officials in all cities in Mississippi fail to enforce the Building Codes. We need educated people as building inspectors.

Presentation

**Comment:** Restating, LIHTC projects must comply with ADA requirements for new construction.

**Presenter:** Thank you.

Presentation

**Comment:** I think all of these are very challenging for people with mental illness, including children, and their families. Part of the problem seems to be that formal systems don't seem to focus on what it takes to live in the community and things aren't very coordinated among systems or between private and public sectors.

**Presenter:** I think that is a great point. Sometimes communities wish to do things and people are just not talking about the same thing when they communicate. I certainly hope that with this avenue we can get the ball moving towards that direction and enhance our communication a little bit better.

Presentation

**Comment:** I think you skipped question 3.

Presentation

**Comment:** People with disabilities need permanent supportive housing, they need to be prioritized by PHAs and transportation needs to be available more consistently.

**Comment:** Thank you.

Presentation

**Comment:** One piece of this is that the ACCESSIBLE housing must be rent controlled....meaning, rents that remain fixed because our incomes are fixed.

**Presenter:** Good Point. Thank you.

Presentation

**Comment:** Chapter 11 of the International Building Code is essentially the same as ADAAG. It has been the State Building Code since 2009. We need to do a better job of enforcing it. It tends to get enforced in commercial buildings in the cities, but residential enforcement is lax.

**Comment:** Poor credit, limited credit are contributing factors.

**Presenter:** Most certainly.

**Comment:** I'm aware of a recent incident in Jackson where neighbors objected to a sober living group home. How are we (society) going to deal with the "Not in my neighborhood" attitude?

**Presenter:** The NIMBYism, the Not In My BackYard attitude, sometimes people do not Not On Planet Earth. I think we can do better than that. I think we can communicate the benefits of this form of housing for our citizens.

Presentation

**Comment:** Hazlehurst Housing Authority: City of Hazlehurst Barriers: Transportation, Jobs and Housing Opportunity such as rental housing stock.

**Comment:** Do we send comments directly to you?

**Presenter:** Please send them to David Hancock and they will forward then to me.

**Comment:** As for disproportionate Individuals are almost always have to settle for inaccessible placement, because there are not enough. The local ADA standard needs to reflect all housing units and not just % of.

Presentation

**Comment:** Will a power point be provided for this presentation?

**Presenter:** This presentation and all the sound and everything is being recorded. We can provide that. If you just want a copy of this presentation I can make sure that David Hancock gets a copy so you can get it from him. He may be able to post it, but that is up to him. He will have both is presentation, the comments received, the comments that I have read.

Presentation

## 10/18/2018 Mississippi Disability and Access Workgroup

**Comment:** I am certain that many folks with disabilities are being segregated in specialized housing units. I am sure that is true across the disability spectrum including people with intellectual disabilities. I can tell you that most of the accessible housing that I know of in Jackson is segregated and that is never, it is never good policy. We need to be integrating people with disabilities in and amongst everyone else.

**Presenter:** Thank you. In order to accomplish this in Jackson, they have a housing authority and they are also an entitlement, who should be taking the lead on this integration effort and what do you think should be done?

**Comment:** In my opinion we need to be developing policies that mandate all new housing projects to have a certain number of fully wheelchair accessible units. I think it needs to be 10 percent and by fully wheelchair accessible I don't mean portable. That is boldly inadequate. I am talking about a roll-in shower and fully accessible kitchen units. Now if we spread these units out to new developments that people with disabilities will be integrated into all the communities around our cities. That is the goal. You want integration. The other thing that would probably need to happen and it would absolutely need to happen for people on fixed incomes which is most of us on disability is we would have to have some kind of sliding scale rent that did not exceed 30 percent of our take home income. That is what is reasonable to expect someone to pay. Does that make sense?

**Presenter:** Yes, what you are saying makes sense. I am hearing you say that there is insufficient accessible housing and that the accessible housing that is to become available needs to be sensitive to the persons with disabilities and their level of income.

**Comment:** Right. Right.

**Presenter:** We had a question. Why these meetings only are focused on disability? Are there meetings focused on race, ethnicity, and other protected classes? These meetings are focused on disability because, disability is not reported very often and we want to get peoples experience. We have analyzed Home Mortgage Disclosure Act information; we can conduct Fair Housing Surveys, and we can get quantitative data on some of these things, but I think it is important to try to be able to get a sense of what people are facing if they have one of these disabilities. So that is why we are dealing with these four meetings for Disabilities and Access Work Groups.

Presentation

**Comment:** I know my friends in the blind community have a very significant need for transportation. Where their housing is relative to transportation it is the most vital thing on their agenda. In other words let's say a person who is blind lives just outside the City of Jackson; they will not have access to transit within Jackson by virtue of the fact that they live just outside the city limits. So therefore that is a huge disadvantage for them and very isolating for them. Just by the fact that they don't live in the jurisdiction served by Paratransit. So that is absolutely vital. Where the affordable housing is relative to transportation must be considered especially for people who are blind or disabled.

**Presenter:** So in this particular example for Jackson who or which agency should take the lead on this? The city or department gets the...

**Comment:** I am not the policy expert. I am a person with a disability and I am here to speak for people with disabilities. I think there are lots of brainstorming, we need to do a lot of brainstorming, and we really do. One way of doing it is embracing transit orientated development. Take your major transit corridors where you have got better bus service and build the accessible affordable housing along those corridors. So that you are automatically building in mobility along those transit corridors. That is just one possibility.

**Presenter:** Thank you.

Presentation

**Comment:** My suggestion is and we have been talking to the city already is that local jurisdictions ought to demand that new developments include at least 10 percent fully accessible units, by that I mean fully wheelchair accessible with roll-in showers, integrated into their plan so that you have got people of varying abilities living amongst everyone else and obviously it is just good policy to build these along transit corridors so that we can plan for the day that more of us use public transit. That is just good policy.

**Presenter:** Thank you.

Presentation

**Comment:** MHC has adopted in federal programs HOME & HTF policies and procedures to address affordable housing for persons with disabilities by offering incentives to developers to designate housing units for ELI & disability populations during application for funding.

**Presenter:** Could you offer some more commentary about that?

**Comment:** The HOME program and the Housing Trust Fund program, basically we are trying to identify high opportunity areas, the affordable housing for extremely low-income individuals and that deals with 30 percent income based on the area median income. So with the Housing Trust Fund program that is one of the things that is designated. That program only deals with the population with extremely low-income. We also have the HOME program so what we are doing is we are working with the developers, with the tax credit developers. We are using our HOME funds, HTF funds and in order for them to receive HTF funds they are asking them to devote a percentage of those development units for people with disability. We are addressing the homeless, the seriously mentally ill and this is something that goes back to our Consolidated Plan. The 15 through 19 Five-Year Consolidated Plan, so we are sort of a head of the game. We are trying to address disparities among people with disabilities and the homeless.

**Presenter:** Thank you. How do your programs distinguish persons with disabilities? How does that define?

**Comment:** We have a down payment assistance program. This is where we work with the USM, University of Southern Mississippi with the House of Your Own Program and their policies and procedures they have to actually document the people's medical conditions. I think that actually comes from the physician to show that they are disabled. Yes that is one of our programs on this downpayment assistance program.

**Presenter:** That would be HUD data doesn't actually address things like mental illness or thing. They only talk about it in terms of cognitive disabilities. So it is a very broad category, cognitive

disabilities. So it would include those with other forms of mental impairment including mental illness.

**Comment:** We also encourage choice program as well. That is one of our rating factors as well. The HTF, Home Program as well.

Presentation

**Comment:** If I am not mistaken aren't fire alarms now required to have visual indicators? I believe that is absolutely vital for the safety of the person.

**Presenter:** That is true, both vision and auditory.

**Comment:** So I am just making sure that all of our housing has visual indicators on the fire alarms and the other thing that would be important would be some kind of visual indicator information about other kinds of alarms like tornado warnings and things like that.

**Presenter:** Thank you very much.

Presentation

**Comment:** I know everything there is to know about having an ambulatory disability. I have MS and I use a powered wheelchair for most of my ability. I had to buy my own house and I am privileged to have a middle class income due to private disability insurance that allowed me to buy my own house and put in a ramp, put in threshold ramps all around my house. I got some assistance from the Mississippi Paralysis Association to retrofit bathroom. It is not perfect, but it is better. My kitchen is still largely inaccessible. Unfortunately, there is nothing that I can do about that, because it is a 1941 house. I had to basically balance access to transportation and food, fresh food with the layout of the house itself. I live right across the street from a grocery store and right across the street from a pharmacy and a bus stop, which is wonderful and it allows me to live independently, but I live in a 1941 house that really can't be made fully ADA compliant. So there you go. Hence what I think we need to do is again, target your major transit routes in your cities, build lots of accessible units, and I mean roll-in showers, not adaptable, that is not adequate. I could never live in an adaptable house given my disability and many older adults are in the same position. So we need to be targeting the transit routes and be building lots of accessible units preparing for the day when our population gets older and lives longer. How we do that is going to take a lot of brainstorming, but we are behind the curve here and we really need to catch up.

**Presenter:** Wouldn't you actually kind of consider that day today? I mean we have many seniors have these needs today.

**Comment:** Yes. Yes. I was trying to be kind.

**Presenter:** So we do have some issues to address. How about just general independent living challenges, persons having independent living disabilities?

Presentation

**Comment:** I have another friend who has a milder disability. She can still walk with a cane, but she is hemiparetic and she has very low-income and because of that she cannot afford the apartment complexes that exist on the transit routes. She is struggling to live independently and manages to do so, but now she has had to move to a cheaper apartment complex which is more than a mile away

from the nearest transit route. So therefore she is basically to put it bluntly under house arrest, because she can't walk that far. She just can't. So, Paratransit is not all it is cracked up to be. Paratransit is not spontaneous. It is not cheap and this is s women who could otherwise be more engaged and more functional and more independent, but for the lack of an affordable apartment on that transit route.

**Presenter:** Thank you for offering that commentary.

Presentation

**Comment:** Why are these meetings only focused on disability? Are there meetings focused on race, ethnicity and other protected classes?

**Presenter:** She has left.

**Comment:** Assistance levels need to be based on a lower percentage of gross monthly income, so as to reduce administrative burden and provide a better level of assistance to the disabled population.

**Presenter:** I believe I read that one already.

**Comment:** The greatest challenge to provide integration of the disabled population into the private rental market is the state's ability to provide outpatient case management. The private owners are not going to be willing to take on case management for cognitive disabilities.

**Presenter:** Anyone else?

**Comment:** I have a friend out of state, this is not in Mississippi, but out of state I have a friend with intellectual disability and she has a case worker that comes out to her integrated apartment and helps her with life skills, making sure that she is managing her finances well, seeking jobs, and things like that. So other states have case workers that go out into the community and visit people with cognitive disabilities in their homes and make sure that everything is okay and that all of their needs are being met. I don't know how we do that here in Mississippi, but obviously that is what needs to happen. The prior commentator, you comment was spot on. We can't expect landlords to do that. That is just not realistic.

**Presenter:** Thank you.

Presentation

**Comment:** I was the one that brought that up. My understanding is IRS Tax Credits do not trigger the federal guidelines for accessible housing under the rehab act. I got that directly from HUD. I did not make that up. I got that directly from HUD and because I pursued it last year and that was the answer I was given. The IRS Tax Credits given do not trigger the Rehab Act Section 504, five percent accessible unit standard. So that is very frustrating for people like me. That is very unacceptable.

**Presenter:** Thank you.

**Comment:** Yes, I believe that those with cognitive disabilities do get segregated. Mostly, the individuals will go to affordable housing which brings them to PHAs. Many of these PHAs have aged housing stock. So, funding for new accessible units is needed.

**Presenter:** Thank you.

Presentation

**Comment:** A little while ago you mentioned rural, rural transportation. I sit on the Intergovernmental Transportation Committee for MDOT and we talk a lot about rural transportation. It is obviously more complicated and more difficult to arrange transportation in rural areas of Mississippi, because the distances are so much longer and therefore it creates more expense getting someone from their home to anything that they need to do. Obviously the policy is to live a more compact lifestyle meaning create accessible units near shopping, medical centers, etc. So that that transportation can be done quicker, more efficient, with less expense. If we were smart and we were building small downtowns in small town Mississippi, we could create housing near those downtown centers and therefore make it more accessible for people with disabilities. That being said the only thing we can do now is fund rural public transit through MDOT. That is something for the legislature. I know that is beyond your control, but in order for people in rural areas to remain engaged and just meet their basic needs they need accessible affordable transportation.

Presentation

**Comment:** One of the slides that you presented listed retaliation as a contributing factor. I was wondering if you could define that word for me in the context of a contributing factor, because I am not familiar with that.

**Presenter:** Contributing that is in the fair housing complaints. HUD tracks, if you file a complaint and your landlord retaliates against you or against whoever filed the complaint that is why it is tracked. If it goes to court past HUD that will come out and that retaliation is really a huge problem. I do notice that complaint a decade ago were significantly greater than there have been recently. So the complaint activity has fallen off. Maybe that is great that you do not have that issue anymore or is it people are not using the system anymore. That is the two issues there.

**Comment:** I hate to be the bearer of bad news, but I have a friend who is so deathly afraid of complaining to HUD about substandard housing because...by the nature of our ... (technical issues)

Presentation

**Comment:** It would be good to know what dollars were made available from this last year to programs for persons with disabilities, including knowing the programs funded and the current status of those programs and the number of households assisted with those dollars.

**Presenter:** I believe that information as it relates to HUD funding document is already produced in the CAPER that MDA and MHC produce each year as they report back to HUD.

**Comment:** Knowing what MDA and MHC is already doing in the state for this population so we can know what to propose they do or do more of in the future.

## 11/15/2018 Mississippi Disability and Access Workgroup

**Comment:** For a number of years folks here at our agency have worked to identify different programs that we manage to help increase the supply of affordable housing for persons with disabilities. So as we work through these programs and some of these initiatives, you know they take some time and we have made some progress and we hope to do more and so the more information and suggestions we receive from our stakeholders such as the folks that are on this call those are the types of things we need that can help us reach our goals more quickly.

**Presenter:** Aside from the Home Corp are there activities the entitlement, regional PHAs, or local PHAs can do to enhance the housing shortage for persons with disabilities?

**Comment:** I am talking in regards to the programs that we offer here at MHC. Again, I think we talked about this once before but I just want to reiterate that we have initiatives set aside for developers for whenever they are applying for HOME funds and the housing Trust Fund. We are asking them to set aside at least 20 percent of their units for people with special needs, people with disability. So that is one initiative we have already and it is working now for us and it has increased the housing for people with disabilities. We also offer a mixed income financing actual to have HOME funds and HTL funds to be used together. We are reaching out to non-profits and housing authorities.

**Presenter:** When you say reaching out to housing authorities, could you describe that?

**Comment:** When we say reaching out we are allowing them to come in apply for some of these HOME funds and HTL funds from a competitive standpoint.

**Presenter:** How many have been successful so far?

**Comment:** In 2016/2017, the applications we received about eight applications which they were required to set aside these funds for housing for people with disabilities and for 2018 we have about on the HOME side, we have received seven applications and on the HTL, I think it is eight applications we have received. So we will increase housing for people with disabilities.

**Presenter:** I am assuming that the entitlements can also do this?

**Comment:** Yes, they did not have to be, they come in for-profit or for non-profit. Under our entitlement we are actually looking at our downpayment assistance program that we do have set aside for people with disability and that is with her and our rehab program. So we also receive I guess an application a week for rehab or to do reconstruction for people with disabilities. In some cases it or not just geared toward our rehab program for people with disability but we do actually reconstruct and rehabilitate homes for people with disabilities.

**Presenter:** Thank you very much for that. The entitlement and the PHAs without your help from the Home Corp can they do something on their own. We are only talking about persons with disabilities who face housing shortages. There are other topics that we will be addressing here as well. So my question is can the entitlements and the PHAs do something on their own? I will take that as a no. Really all this activity is coming from the Home Corp.

Presentation



**Comment:** As I recall she had a question regarding HOYO funding for disabled persons she wanted us to address in Hattiesburg on the 4<sup>th</sup> of December and we will have some information for her at that time, but if we could get her to unmute herself or send you a question that would be helpful, because she is a real expert in this field.

**Presenter:** She is now unmuted. Would you care to comment? We must be having some technical difficulties.

**Comment:** She has that expertise as well.

**Comment:** I wrote in a question concerning MHC funding for the HOYO program and I was just wondering if that has been addressed. I have been having a hard time getting onto the webinar. As you well know HOYO was started in 1997 and I was a part of the process at that time. It is one of the top 100 programs in the country as awarded years ago. I am just a little bit concerned they have such limited availability for safe, affordable housing for people with disabilities which I am one 34 soon the 35 disabled and I have worked in these field for many years and that is the one problem that we have had in the State of Mississippi is getting people out of the institutions, group homes, etc. and getting them into the community. The lack of safe affordable housing, but with MHC help with HOYO program they have put over 500 people in housing in the community. I was just wondering if you all have addressed the process and when if any will they receive funding from MHC in the near future?

**Presenter:** Would someone at MHC be able to address that?

**Comment:** We are in the process of working with others to go over our policies and procedures to make sure that we have everything in order. Once we do that we will release funds. They have funds for 2015 and 2016 and also 2018. There is one million dollars that HOYO has to work with affordable housing.

**Comment:** Do you have any timeframe on when that might be put in place?

**Comment:** We plan to get it started before the end of the year. So we are working on it and we are making sure that we are in compliance with everything and so as soon as we get that done we will start that and it will be before December 31<sup>st</sup>.

**Comment:** Great. That is wonderful news. I hope that works out that way. Thank you so much.

**Comment:** You are welcome.

Presentation

**Comment:** I wanted to let you know that she had family emergency and that is why she could not speak. However they are working with us to complete the policies and procedures so that we proceed. However it is of urgency because the University shuts down and we do thank them for their working with us and we do anticipate getting funds. We just don't know when.

**Presenter:** Thank you. Based on one of the comments we have received in one of our previous work session was a call to building inspectors perhaps by saying they are not quite doing the job that they need to do. What do you think we could do about this?

**Comment:** What type of enforcement is there in place currently if the building inspectors are not doing their job as far as inspecting new buildings, new housing?

**Presenter:** I can't answer that.

**Comment:** Was there anything more specific to that particular question? In what regard were the building inspectors unable to do their job? Were they not trained well or they are not able to identify problems in a timely or accurate manor? I guess if you do not know the answer to that I would like to follow up by saying if there does seem and I can seem to recall that we had a building inspector problem in the past and I don't think it was related to disability housing or housing for the disabled, but I do recall their being training issues. That might be something that we could look at her is trying to coordinate some effective training for building inspectors that inspect units for the disabled, but more specifically we need to find out what those short comings are.

**Presenter:** Based on my experience sometimes one inspector will take a look at the fixtures in the bathroom and so on and how wide the doors are and someone else might look around for access to the building from outside. Now the communication between those two sometimes is not as good as it should be, because maybe the particular units has got a half a flight of stair and the stair are built to code and everything looks good. Then the next guys comes, but the first guy did not think about the individual might have some ambulatory problem. So there are challenges with communication amongst the building inspector, excuse me inspectors, and in particular when constructing units with ADA guidelines they may not be as educated as they could be or should be. So from my experience some issues that come along there.

**Comment:** That was one of my issues years ago when I was working in the field. There was no enforcement of the building codes and things would be passed as ADA complaint which when you looked or scratched the surface whether it be access, whether it be parking or it be entrance way it was not ADA compliant. I haven't been in the field for a few years to look and see if any of that has been improved, but unless there is some type of residential reinforcement I doubt very seriously it has because there is no incentive to do that. If they get passed and it is done, unless somebody complains or somebody has an issue and brings up and files a complaint it just goes unnoticed.

**Presenter:** Thank you. Then it is my understanding that we might wish to take a look at what is going on in the field currently and whether the communication is occurring across building inspectors as well whether they are being ADA compliant particular with new construction.

**Comment:** That is correct and let me ask you a question does not the architectural organization that is responsible for building etc. in the State of Mississippi have to accept and adopt the ADA code or not?

**Presenter:** It is my understanding that ADA code is standard now, but I think your point people are overlooking some of those or they may be over looking some of those. The question of course is if they overlook it they are liable for the outcome. If they do it deliberately they are also in trouble. I believe you are correct that we should have some follow up to this new construction to make and verify that ADA compliance has been fulfilled. I guess that is my conclusion from this discussion on building code enforcement.

**Comment:** Yes, sir.

Presentation

**Comment:** I was going to come in on the previous slide when you were talking about the compliance issue. As HOME funds, HTL funds, tax credit we do have to enforce the building codes as inspectors and based on the requirement we have to go out every so often to inspect the projects

after completion. I do agree that maybe we could offer some type of training specific to building codes dealing with ADA in the 504.

**Presenter:** Thus far we have pretty much turned our attention to Home Corp as the entity that can do anything. We haven't been able to talk about entitlements or the regional PHAs or local PHAs that might be able to do things, but again it would be through Home Corp. It that the recollection you are getting form this discussion as well?

**Comment:** We all work together for the same goal, but and I am asking this question personally. The housing authorities across the state from what I understand have a lot of authority and I think they can actually issue their own bonds. So maybe there is some things that they can look at aside from the funding that we have available or when funding is not available that they could look at to enhance some of these affordable housing opportunities for disabled persons in other areas. I wouldn't know the answer to that, but I guess I am throwing that out there to see if anyone does.

**Presenter:** Does anyone wish to comment about what he suggested here?

Presentation

**Comment:** In Mississippi, we have some area that do prioritize people with disabilities and others that just refuse and those seem to be the more highly populated groups that don't and it would certainly I would just suggest that they would reconsider that. That is a large group of people with a very limited income that are trying to reenter a community and live independently with their disability and it makes it a lot easier when they are put on the top of the priority list.

Presentation

**Comment:** Our agency has a B2I preference for those who are in group homes.

**Presenter:** Can you talk about that a little bit more? Rent controlled units. It doesn't seem like this is such a popular idea. So far rent control has fallen out of favor. So this will not be a part of the recommendations.

Presentation

**Comment:**

**Presenter:** I have a question for you. In the programs that you have been talking about is there a mechanism that might provide persons with disabilities some assistance with purchasing a home or some credit deal if you will?

**Comment:** Well the downpayment assistance program those are set aside funds with the HOYO program I was telling you about earlier. It doesn't really deal with their credit, but the funds that we provide actually allow them to use the money as downpayment assistance to make the house more affordable for people with disabilities and we put in subsidy layers, underwriting standards that we put in right now so that we don't actually provide more money than necessary, but that is basically it when it come to our underwriting standards. We do not take into consideration their credit.

**Comment:** As a housing council agency what we do under the Home of Your Own program we do work one on one with those families that have the limited credit and whether they have a disability of not you have a lot of people that have limited credit because their income and some because they don't have the understanding to understand some credit and that is why we offer the

homebuyer education and resources so that they can learn how to manage their money so that they can obtain credit the right way.

**Presenter:** Thank you. It does not seem like there is a specific program designed to assist persons with disabilities and further subsidize them. It is specific to someone with disabilities.

**Comment:** Those are considered set aside funds.

**Presenter:** Thank you.

Presentation

**Comment:** There are several agencies who have the preference to help get those who are in group homes out. We give a special preference to those individuals moving them to the top of the waiting list.

**Presenter:** NIMBYism is a problem for group home siting. I think we can all probably agree that enhancing outreach to the local citizens in a particular community about the issue of NIMBYism but what else can we do besides enhancing their education for this? Is there anything here and these issues and some of which have fallen flat, but I have pulled these from the conversations who have shared with us previously, but we are at this point now where we are winding this down. So I need to ask you if there is anything else that has been over looked. We have had more housing for disabled persons, persons with disabilities, enhancing the credit or ability to acquire. We have talked about building codes inspections and ADA compliance. So really have we covered it all or is there something else?

**Comment:** I think we need to go back to the rent control. I think we need to discuss that. I do think that should be and with this new housing production program with the Housing Trust Fund, now they encourage that money to go into rental property for people with disability and they do have income restriction that they cannot exceed 30 percent of that person's income and that would think apply to persons with disabilities. I just think that should have been mentioned and that would, and so to answer the question about rent control units that was a part of the and actually objective of Housing Trust Fund. So for people with disability or people with extremely low-income and the people with disability most likely fall into that category.

**Presenter:** Thank you.

**Comment:** That is basically the same thing that I was going to bring up and also to touch on the private sector building apartment complexes and being in compliant with so many units being accessible. That can be an increase in housing in general for people with disabilities.

**Presenter:** Thank you.

**Comment:** I was just hoping that the rent control was not going to fall flat and not be looked into further.

**Presenter:** I am glad that you said that. What I am talking away from this narrative is that most of the activities are going to be coordinated through the Home Corp and not so much the entitlements or the local PHAs. If the regional PHAs are able to get their bonding capacity in play they might have the ability to do something and I think that is something that we should look into. My firm

will look into that to see if they do, but essentially most of the activities needs to be coordinated through Mississippi Home Corp. Is that your understanding as well?

Presentation

**Comment:** I wanted to comment on group homes. I don't think it's an issue in Jackson with NIMBYism, but more an issue with ensuring that group homes are regulated and inspected. A few years ago, there was a woman that froze to death in a group home. The State issues licenses for them, but no one is taking oversight responsibility. I also feel that rent control is a good idea, but not just for the disabled. Often annual rents in Jackson far exceed 30% of the AMI for Jackson.

Presentation

**Comment:** I just wanted to mention one thing and I think she spoke about this. I understand that the funding for HOYO is in the process and that they are checking up their paperwork, etc. but just reminding them that USM will be shutting down and I don't know what the exact date is but maybe the 15<sup>th</sup> and not to be opened up till after January. So I don't know if that plays into it. I don't know if HOYO has to do anything or whatever. I just wanted to mention that and bring it to the forefront again.

**Comment:** I was saying that was just an estimated date that I throw out there, but we have made tremendous progress on this. We will get it going before the holiday.

**Comment:** Our Family Self Sufficiency Counselors continue to comment on the need for more things to overcome transportation issues. Clients number one need after securing housing is transportation so that they can seek employment.