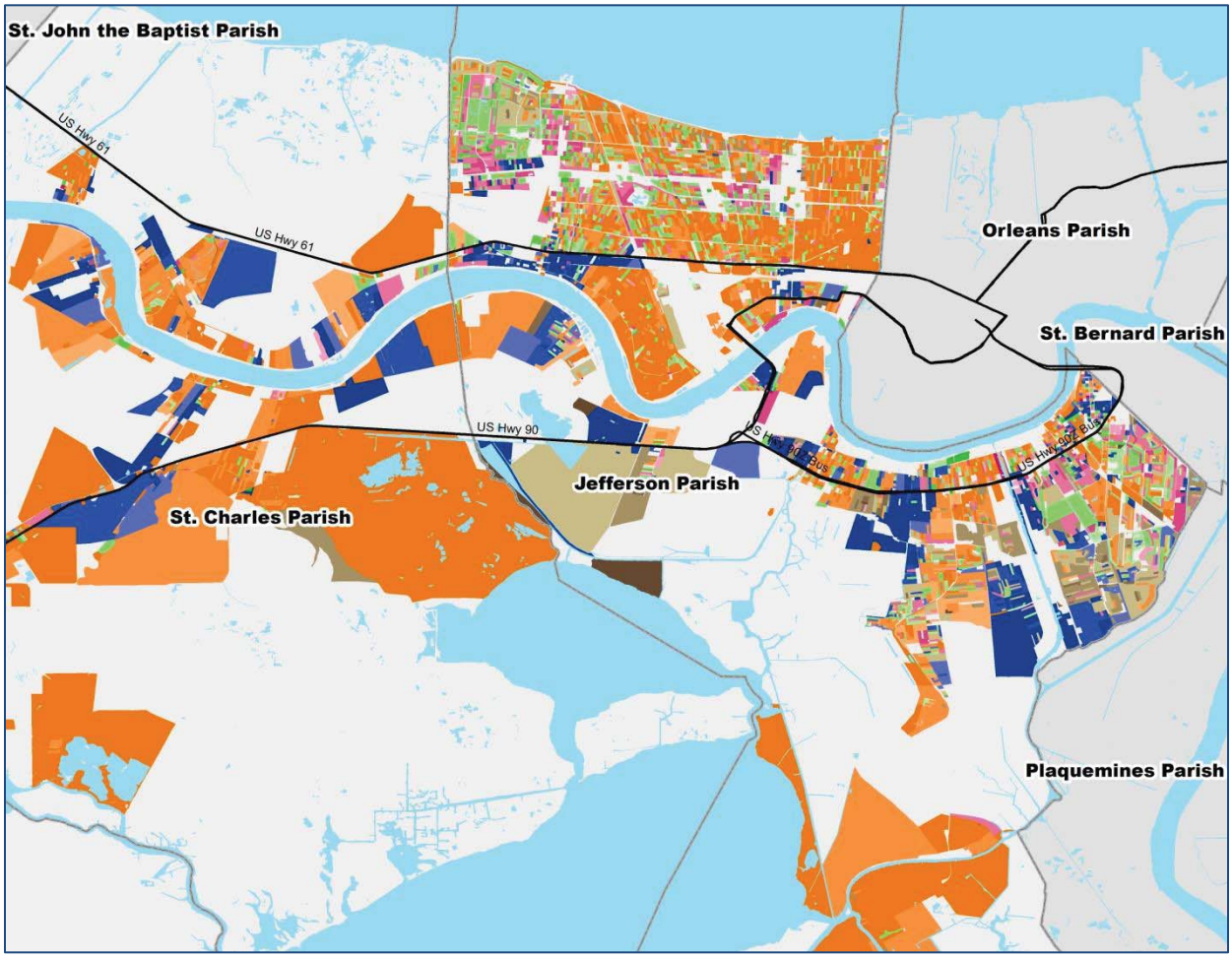
2015-2017 Analysis of Impediments to Fair Housing Choice (rev.11.24.15)

Prepared for: The Jefferson Parish HOME Consortium



Consortium Member Communities:

This Analysis of Impediments to Fair Housing Choice was developed in accordance with the suggested requirements outlined in the U.S. Department of Housing and Urban Development's (HUD) Fair Housing Planning, as well as those stipulated by the Jefferson Parish HOME Consortium. This report specifically focuses upon the protected classes covered by Title VI of the Civil Rights Act of 1968, the Housing and Community Development Act of 1974, and the Fair Housing Amendments Act of 1988.

Prepared for:
The Jefferson Parish HOME Consortium
Jefferson Parish Community Development Department
Detrich Hebert Johnson, Director
1221 Elmwood Pk. Blvd., Suite 605
Jefferson, LA 70123

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EQUAL HOUSING OPPORTUNITY

TABLE OF CONTENTS

EXECUTIVE SUMMARY 1

Fair Housing Education and Enforcement Capacity Insufficient 2

Fair Housing Awareness 2

State and Local legal frameworks governing housing lack adequate protections for housing consumers 3

Mortgage Lending Patterns Disadvantage Non-traditional Credit 3

Resource Allocations Remain Focused on Rehabilitation Post-Katrina 3

Gap between Housing Needs and Housing Market 4

Historic and Existing Segregation, Division, and Exclusion along Economic and Racial Characteristics 4

COMMUNITY BACKGROUND AND HISTORY 5

FAIR HOUSING CAPACITY 6

Legal Framework 6

Fair Housing Statutes and Ordinances 6

Protected Classes 6

Transactions Covered by Fair Housing Laws 7

Types and Theories of Discrimination 7

Implementation and Administration of Fair Housing Laws 8

Fair Housing Complaint Profile 9

Fair Housing Education and Enforcement Capacity 10

Civil Rights-related Reports, Media Coverage, and Background in the Jefferson Parish Area 11

RECENT DEMOGRAPHIC TRENDS 14

2009-2013 Estimates 14

Owner and Renter Occupied Housing 15

Spatial Distributions 16

1980 through 2013 18

ECONOMIC CONDITIONS 22

Federally Assisted Housing 23

Zoning and Land Use 27

DATA ANALYSIS 33

Patterns of Integration and Segregation 33

Patterns of Poverty 35

Home Mortgage Disclosure Act (HMDA) Analysis 50

Housing Affordability 64

PUBLIC PARTICIPATION AND COMMENTS 69

Public Input Meetings 69

Public Comment Meetings 70

Public Comments and Input 70

IMPEDIMENTS TO FAIR HOUSING CHOICE 72

Fair Housing Education and Enforcement Capacity is Insufficient 72

Fair Housing Awareness 73

Strategies 73

State and Local Legal Frameworks Governing Housing Lack Adequate Protections for Housing Consumers 74

Mortgage Lending Patterns Disadvantage Non-traditional Credit 76

Resource Allocations Remain Focused on Rehabilitation Post-Katrina 77

Gap between Housing Needs and Housing Market 78

Historic and Existing Segregation, Division, and Exclusion along Economic and Racial Characteristics 79

SUGGESTED PRIORITIZATION AND TIMELINES 80

APPENDIX A

JEFFERSON PARISH HOME CONSORTIUM 2015 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

EXECUTIVE SUMMARY

Fair housing is not simply a responsibility under state and federal law; it is a moral obligation and a matter of sound public policy. No community can reach its full potential for well-being if some residents are unable to fully participate in the housing market. Numerous studies clearly show the relationship between housing and education, jobs, transportation, and the ability to build wealth. When housing choices are limited by practices and policies that are discriminatory in their intent or impact, individuals, families, and communities are denied the ability to reach their full potential.

As stipulated by the U.S. Department of Housing and Urban Development (HUD) each entitlement jurisdiction and/or recipient of Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), and Emergency Solutions Grant (ESG) funding is required to complete an Analysis of Impediments to Fair Housing Choice (AI). Formed in 1993, the Jefferson HOME Consortium consists of Jefferson Parish, the City of Kenner, and St. Charles Parish. Jefferson Parish serves as the lead entity and the oldest CDBG entitlement community within the Consortium.

As recipients of funding under these programs, each jurisdiction is obligated to identify, analyze, and ameliorate impediments to fair housing choice that exist within its political boundaries. A thorough Analysis of Impediments to Fair Housing Choice is more than a catalog of prohibited acts; it is an analysis of social and demographic trends and a study of the barriers to housing choice within a community. Such a comprehensive study must identify the systemic and structural issues that limit a person's ability to take advantage of the full range of available housing. This report explores a variety of social issues related to housing such as affordability and poverty. A multitude of factors influence housing such as lower income levels for minorities and people with disabilities however, it is beyond the scope of this report to explain or provide solutions for the many causes and roots of these social issues. Instead, this report attempts to identify the most immediate and significant barriers to housing choice facing protected classes and to propose solutions that directly and effectively address those barriers.

Founded in the early 19th century, Jefferson Parish has grown from an early bedroom community of New Orleans to the region's most populous municipality and the center of retail. Through the postwar years of the mid-20th century, Jefferson Parish experienced the growth dynamics similar to many suburban counties throughout the country. Public policies and private market practices encouraged suburban development and offered greater access to credit, and suburban counties grew exponentially. However, black families were often excluded from accessing suburban developments by discriminatory lending policies, racially restrictive covenants, steering, and other forms of public and private discrimination.

The population of Jefferson Parish doubled between 1940 and 1950 and again between 1950 and 1960, settling near 450 thousand people by 1980. The total population remained around 450 thousand until a series of environmental catastrophes: Hurricanes Katrina and Rita in 2005 and the Deepwater Horizon oil spill in 2010. The impact Hurricane Katrina had on the New Orleans region was devastating; the City of New Orleans lost over half of its population and millions of people along the Gulf Coast were displaced. Between 2000 and 2010 the population of Jefferson Parish contracted by approximately 4.5 percent. Since 2000, the Parish has experienced increases in African American, Hispanic, and Asian population, while the white population has contracted.

This tremendous growth and change has not been without incident. The Parish has faced several civil rights related lawsuits over the past decade. In 2014, the Departments of Education and Justice reached a settlement with the Jefferson Parish Public School System (JPPSS) to resolve complaints alleging discrimination against Latino students and their families. In 2012, the Southern Poverty Law center filed a civil rights complaint against the JPPSS alleging that students with disabilities and African-Americans were disproportionately punished within the school system and faced a higher rate of school-based arrests. In 2010, the Greater New Orleans Fair Housing Action Center filed a complaint alleging a failure on the part of Jefferson Parish to enforce civil rights obligations associated with the use of federal housing and community development funds. The resultant conciliation agreement stipulated the development of this document.

Though many of these issues have been addressed, the Parish continues to face the challenge of how best to provide accessible, safe, clean, and affordable housing for an increasingly diverse population whose residential needs may not mirror traditional patterns.

This study identified seven broad impediments to fair housing choice within the Jefferson Parish area. Jefferson Parish has been working to address some of the issues for numerous years, and, due to the complexity of their nature, will need to continue to address for years to come. Other impediments have only recently developed in concert with demographic changes over the past several years. Regardless of when these issues came into existence, they serve to limit the housing choices of residents within the Jefferson Parish area.

Fair Housing Education and Enforcement Capacity Insufficient

Few, if any, local public resources are available to individuals who believe they have experienced housing discrimination. This includes information on the forms housing discrimination may take place, the rights of individuals under state and federal fair housing laws, and referral services that may point an individual towards fair housing resources.

The Greater New Orleans Fair Housing Action Center (GNOFHAC) provides many of these services as a private, non-profit fair housing organization. Parish staff often refers individuals with fair housing questions and issues to GNOFHAC, but, in the absence of local fair housing protections and administrative resources, a written procedure for receiving and directing fair housing-related inquiries is needed.

Fair Housing Awareness

Fair housing awareness – being informed on an individual's rights as a housing-seeker and responsibilities as a housing provider – is a necessary step in creating a fair and open housing market. Awareness is a function of both education on the laws and, when violated, enforcement of them. The lack of education and enforcement capacity at the parish or city level leaves residents without full understanding of their rights and housing providers without clear knowledge of their responsibilities.

The Consortium's 2013 CAPER discusses the challenges facing several assistance programs. Of concern is the denial of applications for ramps due to property setbacks. Further, the draft Consolidated Plan states that landlords rarely allow disabled tenants to make accessibility changes in the unit even at the tenant's expense. Simply put, reasonable accommodations are the law; *it is the landlord's responsibility to accommodate tenants as well as allow modifications to the structure, within reason so that the tenant has full accessibility*. Additionally, interviews with parish staff indicated the need for a clearly defined fair housing referral system. An effective referral system to deal with issues as above, which are often times solved with a phone call or letter, and others would affirmatively further fair housing choice throughout the region.

State and Local legal frameworks governing housing lack adequate protections for housing consumers

Shelter, or housing, is an essential human need. In the U.S., housing is also a means of building wealth, earning an income, and accessing public and private resources such as education or employment. The interaction between housing providers and housing consumers is a business relationship. The necessity of shelter can place consumers at a disadvantage when entering into such a relationship, as the housing provider is not likewise seeking an essential human need. Federal protections against discrimination recognize the importance of ensuring fair and equal access to that need.

There are no local fair housing protections in the Jefferson Parish HOME Consortium. The 2013 conciliation agreement between Jefferson Parish, HUD, and the Greater New Orleans Fair Housing Action Center outlined a process by which the parish would draft such an ordinance and submit it to Parish Council for consideration and enactment. This process remains incomplete.

Louisiana's Landlord-Tenant laws leave tenants with few protections against rapid eviction. The law stipulates that landlords may evict tenants in month-to-month leases with no cause, provided they give tenants 10 days written notice. Tenants who are believed to have violated their lease may be evicted with 5 days written notice. Landlords may request that tenants waive the 5 day requirement in the initial signing of the lease. There is no requirement that a landlord give the tenant an opportunity to resolve the alleged lease violation.

Louisiana's landlord-tenant laws heavily favor rental housing providers, placing the renter population (among which, low income, non-white, and female-headed households are overrepresented) at risk of homelessness, substandard housing, or potentially costly court proceedings. The laws place significant burdens on limited legal aid resources, local courts, and law enforcement officials.

The Parishes must work towards a solution that provides renters with reasonable timeframes to secure alternate housing or a stock of readily available and affordable quality rental units. Such actions would free public resources as well as needed private resources that are currently utilized in court and law-enforcement based eviction proceedings.

Mortgage Lending Patterns Disadvantage Non-traditional Credit

The Jefferson Parish Area prides itself, and rightly so, as a community of homeowners. Discrimination in the mortgage markets has universally prevented minorities, predominantly blacks, from accessing the numerous benefits of home ownership. It has led to entrenched segregated residential patterns, which in turn have exacerbated income disparities across racial/ethnic lines. Local governments bear the responsibility of providing social services and resources to underserved populations. As such, it is in their best interest to ensure that those households desiring and able to become homeowners have the education, stability, and financial capacity to do so free from discrimination.

Resource Allocations Remain Focused on Rehabilitation Post-Katrina

Community development block grant funding has largely been utilized on housing rehabilitation and public facilities improvement efforts – repairing damaged housing, elevating homes to a flood protected elevation, and addressing water and sewer line improvements. This spending has been a necessity in the post-Katrina years, both to address housing needs and to mitigate the costs of flood insurance. However, the unique housing and infrastructure rehabilitation and retrofitting needs of the region place pressure on finite resources.

Jefferson Parish and its consortium members must continue to expand existing funding for community and economic development targeted towards areas of need, such as Racially/Ethnically Concentrated Areas of Poverty and low income/low food access areas.

Gap between Housing Needs and Housing Market

The number of housing units affordable to households with incomes at or below 50 percent of the area median is insufficient to meet the needs of area residents. Housing that exists at that level of affordability is clustered into only a few dense neighborhoods (see Map 14 on page 66). Households at this income level are disproportionately black, Hispanic, and female-headed.

As the demographics of the area continue to follow a decades-long pattern of increasing black and Hispanic households and shrinking white households, the parishes must seek to steer development to meet the needs of these populations.

Historic and Existing Segregation, Division, and Exclusion along Economic and Racial Characteristics

The history of the New Orleans region, like many of the oldest cities in the United States, is one of separation by race and class. This division, while clear on maps such as Map 1 on page 17, was made visible in the aftermath of Hurricane Katrina and levee failures in 2005. The effects of historical and existing segregation and discrimination left many black residents particularly vulnerable to the flooding that engulfed New Orleans. Policies and actions of surrounding parishes in the days and years since have been exclusionary in nature.

In order to maximize the economic, cultural, and social assets of the area, the parishes must proactively seek to create a housing market based on fair housing choice. That requires acknowledging existing patterns of division and finding ways to encourage inclusive development, economic and social mobility, and equal access to public assets.

If the Parish is honest in its desire "…to address the needs of the area, to include affordable housing needs, mainly for low and moderate income persons," they would benefit from adopting an inclusive stance as well as an Anti-NIMBY marketing and educational campaign.

Community Background and History

Jefferson Parish is a major urban parish (county equivalent) in the New Orleans-Metairie Metropolitan Statistical Area. The parish is bordered by Orleans Parish and Plaquemines Parish to the east, St. Charles Parish (also part of this analysis) and Lafourche Parish to the west, Lake Pontchartrain to the north, and the Gulf of Mexico to the south. The northern halves of both Jefferson and St. Charles Parish are bisected by the Mississippi River. The Mississippi is an essential element of the region's economy, housing patterns, and history, as it has served as a source of commerce, an obstacle to development, and one of several environmental threats to life and property. Water and wetlands may be the defining characteristics of the region. Although the borders of Jefferson Parish encompass 642 square miles, water and wetlands cover 54 percent of the area. Approximately 30 percent of St. Charles Parish's 397 square mile area is water or wetlands.

Jefferson Parish was founded in the early 19th century. In the two-hundred years since, the parish has grown from an early bedroom community of New Orleans to the region's most populous municipality and the center of retail. Through the postwar years of the mid-20th century, Jefferson Parish experienced the growth dynamics similar to many suburban counties throughout the country. Public policies and private market practices encouraged suburban development and offered greater access to credit, and suburban counties grew exponentially. The opening of the first span of the Crescent City Connection in 1958 made commuting between a home in Jefferson Parish and a job in New Orleans possible. However, black families were often excluded from accessing suburban developments by discriminatory lending policies, racially restrictive covenants, steering, and other forms of public and private discrimination. White families did not face the same barriers, and the migration of middle class white families from urban centers to suburban counties – particularly in reaction to public school integration – became known as White Flight.

The population of Jefferson Parish doubled between 1940 and 1950 and again between 1950 and 1960, settling near 450 thousand people by 1980. The total population remained around the 450 thousand level through the mid-2000s, but the parish experienced moderate contraction after the environmental, physical, political, and economic effects of Hurricanes Katrina and Rita in 2005 and the Deepwater Horizon oil spill in 2010. The most recent Census Bureau estimates (American Community Survey 2009-2013 5-year estimates) place the population of Jefferson Parish at 433,477 individuals.

St. Charles Parish, created in 1807 as an agricultural district from what was then known as the German Coast, remains a relatively rural and less-densely developed component of the New Orleans region. Signs of the parish's history – plantations and farms that once produced sugar cane, indigo, and vegetables – remain, but the local economy shifted towards industry and oil through the 20th century.

The population of St. Charles grew rapidly between 1950 and 1980, but the increase from 13,000 to 37,000 did not bring with it the kind of intense development seen in suburban Jefferson Parish. St. Charles has continued to grow at a moderate pace through the 21st century, and the most recent estimates place the 2013 population near 52,700 individuals.

Slavery in the New Orleans region shaped the economic and social patterns of the area in ways that still reverberate. The institution of slavery was a fundamental component of the region's agricultural economy, including sugar cane plantations and tobacco and cotton fields. New Orleans served as a port for the import and export of agricultural products, but also for the import and sale of enslaved peoples.

Census counts from 1820 show that people in slavery – the majority of whom were black – constituted more than a third of the population of Orleans Parish and more than 75 percent of the population of St. Charles Parish. The ratio

of slaves to whites in 1820 St. Charles was more than four to one.[1] Much of the region's growth and economic prosperity has roots in slavery, although that prosperity was not always shared.

The area's economy shifted towards industry and oil at the turn of the 20th century, and today much of it remains centered on oil.

Fair Housing Capacity

Legal Framework

The term “fair housing” refers to legal protections from discrimination in housing-related transactions. These protections can be offered at the federal, state, and local levels of government. The broadest protections stem from the federal Fair Housing Act, Title VIII of the Civil Rights Act of 1968. The Fair Housing Act serves as a baseline. States and local governments may provide additional protections, but all persons seeking housing in the United States are protected under the provisions of the Fair Housing Act, regardless of the state or community in which they live or are seeking to live.

Fair Housing Statutes and Ordinances

Enacted in 1968 and substantially amended in 1988, the Fair Housing Act prohibits discrimination on the basis of race, color, national origin, religion, sex, handicap, or familial status at all stages of any housing-related transaction. These characteristics are often referred to as protected classes or protected statuses. Fair housing protections extend to all U.S. residents.

States and local governments may provide additional protections. The Louisiana Equal Housing Opportunity Act, enacted in 1991, mirrors the list of protected classes included in the U.S. Fair Housing Act. Individuals engaged in any form of housing transaction in Louisiana are protected from discrimination based on race, color, national origin, religion, sex, disability, and familial status under both federal and state statutes.

Jefferson Parish does not currently have any local ordinance in place barring housing discrimination. Ensuring non-discrimination in housing opportunities is an objective and goal within the housing element of the parish's comprehensive plan ordinance.

The Parish established a Fair Housing Working Group in August of 2013 as part of a voluntary conciliation agreement with HUD and the Greater New Orleans Fair Housing Action Center (GNOFHAC). The agreement followed a complaint filed by GNOFHAC in 2010 alleging Jefferson Parish failed to meet its civil rights obligations as a recipient of federal housing and community development funds. The working group was tasked with, among other things, drafting and proposing a Fair Housing Ordinance to Jefferson Parish Council. No such ordinance has been adopted by the Parish.

Protected Classes

Individuals and groups are protected from discrimination based on the following characteristics (or the perception of the following characteristics):

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[1] Minnesota Population Center, *National Historical Geographic Information System*, version 2.0 (Minneapolis: University of Minnesota, 2011).

Race: Includes any and all races. Example: A real estate agent avoids white neighborhoods when showing homes to an African-American family.

Color: A person's skin color. Example: A leasing agent informs a darker skinned African-American that there are no units available but tells a lighter skinned African-American a unit will be available in several weeks.

National Origin: The country from which an individual is from or perceived to be from, regardless of current citizenship. Example: A landlord charges Hispanic or Latino families higher rents.

Religion: A person's practices, rituals, or beliefs related to worship or faith, including the absence of any such beliefs and practices. Example: An advertisement for an apartment states a preference for a Christian tenant.

Sex: A person's status as male or female, including sexual harassment. Example: A landlord demands sexual favors from a female tenant who is late on rent payments.

Disability: Any physical or mental impairment that substantially limits one or more major life activities, a record of having such an impairment, or the perception of such an impairment. This definition does not include current and illegal use of or addiction to a controlled substance. Example: A landlord asks for a pet deposit from a person with a disability because they have a service animal.

Familial Status: The presence of one or more individuals under the age of 18 in a household. These protections extend to persons who are pregnant or in the process of securing custody of an individual under the age of 18. Example: A leasing agent refuses to rent a second floor apartment to a single mother, telling the mother that it is company policy to house children on the first floor.

Transactions Covered by Fair Housing Laws

Fair housing laws apply to all stages of the sale, rental, or advertising of housing and any services provided in connection with securing and maintaining housing. This includes not only the primary transactions involved in securing housing (the acts of selling, purchasing, or leasing a dwelling) but also related services such as mortgage lending and insurance provision.

A few exemptions to specific elements of fair housing laws exist for religious organizations, private clubs, owners of three or fewer single-family houses, owner-occupants, and housing designated for older persons. See 24 C.F.R. § 100.10 for additional details. Due to the public nature of advertising, prohibitions against discriminatory advertising apply regardless of most exemptions.

In general, persons and institutions engaged in the provision of housing or related services as a primary function — real estate agents, landlords, property managers, mortgage lenders, insurance brokers, homebuilders, public housing authorities, real estate assessors, and others — are bound by legal prohibitions against discrimination.

Types and Theories of Discrimination

Acts of discrimination that violate the Fair Housing Act may fall into one of two broad legal theories of discrimination: discriminatory intent and discriminatory effect.

Discriminatory intent (or disparate treatment) involves either direct evidence of intentional discrimination (e.g., a property manager who tells an African-American applicant, "We don't rent to blacks.") or indirect evidence that the purpose of one or more actions was discriminatory. Indirect evidence is necessary in the absence of clear statements of intent. Such evidence is often obtained through fair housing "testing."

Testing is the process of comparing the experiences of two or more individuals posing as potential renters or buyers of a dwelling. The individuals typically have similar characteristics with the exception of a protected status. The information testers gather allows for comparison of treatment between a protected class and a control group. Differential treatment may take many forms, including the different contract terms, qualification criteria, maintenance standards, and access to the use of facilities.

The second legal theory, discriminatory effect (or disparate impact), describes facially neutral practices that have the result of discriminating against a protected class. The intent of the actions is not considered. For example, land use ordinances restricting multifamily housing to neighborhoods with high concentrations of racial or ethnic minorities may predictably have the effect of concentrating poverty in minority communities and/or perpetuating segregated housing patterns. Although land use ordinances are facially neutral (they describe spatial restrictions in terms of use, not the protected characteristics of individuals), they may have a disparate impact on protected classes. Such an impact may be considered a discriminatory effect in violation of the Fair Housing Act unless a legally sufficient justification for the practice exists.

The U.S. Department of Housing and Urban Development (HUD) is responsible for the administration and enforcement of the Fair Housing Act. HUD implemented a regulatory standard for discriminatory effect/disparate impact in 2013 (see 78 F.R. 11459). The ruling formalized liability under the Fair Housing Act for practices with an unjustified disparate impact on protected classes. It also established a three-part burden-shifting test for determining what constitutes an unjustified practice. The Supreme Court of the United States ruled that disparate impact claims are recognized under the Fair Housing Act in 2015[2].

Implementation and Administration of Fair Housing Laws

Different bodies are tasked with implementing and enforcing fair housing laws. At the federal level, HUD is responsible for administering the Fair Housing Act. The Louisiana Equal Housing Opportunity Act is administered and enforced by the Louisiana Department of Justice, Office of the Attorney General.

The administrative bodies are responsible for initiating, receiving, investigating, and resolving complaints filed by individuals or organizations that believe they have been injured by illegal discrimination.

Administrative Enforcement

The administration of fair housing statutes and ordinances includes enforcement of their provisions. Administrative enforcement is the process of non-judicial investigation and resolution of complaints undertaken by the responsible administrative bodies. In cases where facts indicate a violation has occurred and the administrative enforcement process does not produce an acceptable resolution, administrative bodies may bring action in court.

HUD and the Louisiana Attorney General's Office outline similar administrative enforcement processes. After a complaint is received and accepted, the responsible office will notify the person or entity against which the complaint has been filed and offer an opportunity for response. The office will then begin an investigation into the complaint, which may include interviews, onsite visits, and document reviews. During the investigation process, the office will also attempt conciliation between the parties involved. If a conciliation agreement is reached, the investigation ends. Otherwise, the investigation continues until completed. The administrative body then decides whether there is reasonable cause to believe illegal housing discrimination has or will occur based on the facts of

[2] Texas Department of Housing and Community Affairs et al. v. Inclusive Communities Project, Inc., et al., 576 U.S. ___ (Supreme Court of the United States 2015).

the investigation. If “no reasonable cause” is determined, the case is closed. If “reasonable cause” is determined, the Louisiana Attorney General's Office will seek relief for the victim by filing suit in state court.

Administrative complaints typically must be filed within 365 days of a violation, unless the violation is considered part of an ongoing, longer term pattern called a “continuing violation.”

Private Enforcement

Victims of housing discrimination may also seek relief through private action under federal and state law. Victims may file suit in state or federal court within two years of an alleged violation. Filing an administrative complaint is not a prerequisite, and the dismissal of an administrative complaint does not preclude private action.

Substantial Equivalency

State and local agencies that enforce fair housing laws may apply for Substantial Equivalence Certification from HUD. Certification requires that (1) state and local fair housing laws provide rights, procedures, remedies, and judicial review provisions that are substantially equivalent to the Fair Housing Act, and (2) those laws are implemented, administered, and enforced so as to function in a manner substantially equivalent to the Fair Housing Act.

After an agency receives substantial equivalency certification, it becomes eligible to participate in HUD’s Fair Housing Assistance Program (FHAP). FHAP participants are considered by HUD to be carrying out the spirit and letter of the Fair Housing Act, and they are eligible for reimbursement from HUD for their enforcement activities. HUD generally refers complaints from jurisdictions served by FHAP agencies to those agencies.

There are multiple benefits of substantial equivalence certification. FHAP participation provides agencies access to funding. It also marks a shift in enforcement from the federal level to more accessible state and local agencies. The presence of fair housing professionals and resources in states and communities increases the capacities of those areas to engage in outreach, education, and enforcement.

In Louisiana, the Public Protection Division of the State Department of Justice is a FHAP agency, indicating that the Louisiana Equal Housing Opportunities Act and its enforcement are substantially equivalent to federal protections.

Fair Housing Complaint Profile

Patterns of housing discrimination complaints in the Jefferson Parish area indicate that individuals experience race-based discrimination at higher rates than other protected statuses. The incidence of fair housing complaints is not, on its face, an indication of whether a community experiences particularly widespread discrimination or, in the absence of any complaints, a sign that discrimination is not an issue. The incidence of complaints indicates that residents understand and are aware of their rights under the Fair Housing Act, and that they know where to turn for help. The Greater New Orleans Fair Housing Action Center is a regional resource that aids residents who may have experienced illegal discrimination in the complaint process. Individuals with access to such a resource are better equipped to seek resolution by filing complaints.

The number of fair housing complaints in an area can indicate what forms of housing discrimination are prevalent, but it may also point to other issues, including knowledge of protections and how they may be accessed.

HUD received 93 complaints of discrimination that originated in Jefferson Parish or St. Charles Parish from 2010 to 2015. Of those complaints, 48 percent were on the basis of race, 25 percent on the basis of disability, and 12 percent on the basis of familial status. That race remains the most frequent basis of complaints is a fair housing issue.

Approximately one-third of complaints were classified as "no cause," meaning that investigators could not find sufficient evidence of illegal discrimination to move forward. "No cause" is not a determinative finding that discrimination did not occur, and individuals may still seek relief through the court system. The remaining two-thirds of cases were conciliated, referred to prosecutorial bodies, closed through administrative resolution, withdrawn following some resolution, or remain open.

TABLE 1: HUD FAIR HOUSING COMPLAINTS IN THE JEFFERSON PARISH AREA, 2010-2015

Outcome	Race	Color	National Origin	Religion	Sex	Disability	Familial Status	Retaliation	Total
Administrative Closure	8				1	3	2		14
Cause (referred to FHAP)	5				1		3	1	10
Conciliated	12	1	1			8	1	1	24
No Cause	15	1	1			9	5		31
Open	5		1		2			1	9
Withdrawn with Resolution					2	3			5
Total	45	2	3		6	23	11	3	93
Percent of total	48%	2%	3%	0%	6%	25%	12%	3%	

Source: U.S. Dept. of Housing and Urban Development

Fair Housing Education and Enforcement Capacity

The fair housing enforcement capacity of an area is a function of the framework of legal protections, the active enforcement of those protections by government agencies, and the monitoring of housing activity by private and public entities.

The framework of fair housing laws in the New Orleans region meets basic standards necessary to ensure individuals who experience housing discrimination may seek remedy, but those laws do not expand protections beyond those provided under federal law.

The Louisiana Department of Justice serves individuals in Jefferson Parish, St. Charles Parish, and the City of Kenner in the administrative resolution of complaints. Although the existence of a statewide FHAP is positive, the absence of local public agencies and resources makes the process of accessing those resources more difficult for individuals experiencing housing discrimination. There are currently no local protections against housing discrimination, and therefore, there are no opportunities to seek local administrative resolution to housing discrimination.

Private agencies – namely the Greater New Orleans Fair Housing Action Center and Southeast Louisiana Legal Services – provide legal resources to individuals, including fair housing resources. These agencies are essential components of monitoring and enforcing fair housing protections. However, their capacities may not be sufficient to fully address the needs of the region. Louisiana state laws covering the responsibilities of landlords and tenants provide limited protections to renters, including extremely short periods of eviction notice (five or ten days, depending on the terms of the lease and cause of eviction). The finite resources and legal services that might be available to individuals experiencing discrimination are often utilized in service of individuals and families seeking to either avoid eviction or extend the eviction period to find other housing.

Little information on how to access fair housing resources is available on the Jefferson Parish, St. Charles Parish, or City of Kenner websites. Discussions with public employees of Jefferson Parish indicated that individuals who may call with complaints of discrimination are typically directed to the Greater New Orleans Fair Housing Center or HUD, but there did not appear to be a standardized procedure.

Jefferson Parish's Community Development department provides resources and housing counseling for emergency home repair, first-time homebuyer and down payment assistance, home modification for persons with disabilities, homeownership assistance for persons with developmental disabilities, rehabilitation assistance, and home replacement assistance. Information on these services is made available by email or phone.

St. Charles Parish's Community Services department provides resources for temporary emergency assistance for low income and unemployed families, emergency home repair, energy assistance, food needs (as a community food bank), summer food needs for students in accredited parish schools, and mortgage assistance (down payment assistance). Information on these services is available by phone or through a submission form on the Parish's website.

The City of Kenner's Community Development department offers resources for housing rehabilitation, homeownership and down payment assistance, first time homebuyer counseling, and homelessness prevention. Kenner also operates a Hispanic Resource Center, which offers interpretation services, referrals, language courses for both English- and Spanish-speaking individuals, homebuyer training, and citizenship training.

An individual seeking fair housing information from any of the jurisdictions would need to call or email parish or city staff and would likely be redirected to either a private fair housing organization or the Louisiana Department of Justice.

Civil Rights-related Reports, Media Coverage, and Background in the Jefferson Parish Area

Jefferson Parish Public Schools

In 2014, The Departments of Education and Justice reached a settlement with the Jefferson Parish Public School System (JPPSS) to resolve complaints alleging discrimination against Latino students and their families. The complaint stated that the school failed to provide adequate interpretation and translation services for Spanish speaking parents with Limited English Proficiency (LEP). In addition, the complaint documented a hostile environment towards Latino students and harassment based on immigration status. As a result of the settlement, JPPSS must implement a number of revisions to school policy in order to ensure that individuals with LEP have equal opportunity within the education system, including translation and interpretation services, staff trainings regarding communication, and a bilingual parent advisory committee.

- http://www.ed.gov/news/press-releases/departments-education-and-justice-reach-settlement-agreement-jefferson-parish-public-school-system-ensuring-equal-access-and-non-discrimination-schools
- http://www.splcenter.org/get-informed/case-docket/mv-vs-jefferson-parish-public-school-system

In 2012, the Southern Poverty Law Center filed a civil rights complaint against the JPPSS alleging that students with disabilities and African-Americans are disproportionately punished within the school system and face a higher rate of school-based arrests. These students are sent to alternative schools at a higher rate and for longer periods of time. According to the most recent update to the complaint, African-American students made up 41 percent of the student body, but 80 percent of school based arrests. The complaint also provides data showing that more arrests occur within schools with a greater number of African-American students. In the 2011-2012 school year, there were 706 school-based arrests in a student body of 45,914, a number far greater than surrounding school systems (New Orleans Advocate). The complaints are being investigated by the Department of Education.

- http://www.splcenter.org/get-informed/news/discrimination-against-students-of-color-rampant-in-louisiana-school-district
- http://www.theneworleansadvocate.com/news/12319107-172/jefferson-parishs-disproportionate-rate-of

Voting Rights

In 2010, The Advocacy Center filed a lawsuit on behalf of a Kenner woman alleging that people that use wheelchairs face barriers at polling locations. The lawsuit alleges that the Parish is in violation of the Americans with Disabilities Act and The Rehabilitation Act. The Advocacy Center conducted a survey of 69 polling sites and found 78 percent had "significant barriers to individuals with mobility impairments."

- http://www.nola.com/politics/index.ssf/2010/06/kenner_woman_sues_jefferson_pa.html

Fair Housing

In 2006, Jefferson Parish passed a resolution encouraging the Louisiana Recovery Authority and Louisiana Housing Finance Agency to reject applications for tax credits in Terrytown and Gretna. The author of the resolution expressed concerns about former residents of public housing, who are disproportionately people with disabilities, African-Americans, and Latinos (Berry v. Volunteers of America, Inc., 2011) (Adams, 2006).

At the time the resolution was passed, an application was pending for a 200-unit building to replace flooded units of elderly housing. Despite the resolution attempting to dissuade such projects, the non-profit developer obtained $6.92 million in tax credits from the state. In response, the parish passed a resolution for an 18-month land use study, stopping development while the Parish considered changing the zoning of the site from allowing multi-family structures to single-family residential. As a result, the non-profit developer abandoned the project's location in favor of Orleans Parish (Seicshnaydre).

- http://www.leagle.com/decision/In%20LACO%2020110427420/BERRY%20v.%20VOLUNTEERS%20OF%20AMERICA,%20INC.
- http://www.gnofairhousing.org/2006/10/20/fair-housing-center-opposes-jefferson-parish-resolution-cites-potential-discriminatory-effects/
- http://judiciary.house.gov/_files/hearings/pdf/Seicshnaydre100729.pdf

In 2007, the Kenner City Council proposed a year-long moratorium on construction of multi-family structures with more than five units while the University of New Orleans completed a land-use plan. The ban was implemented in 2008, blocking any Low Income Housing Tax Credit (LIHTC) development and hindering the rebuilding of properties destroyed by the storm (Seicshnaydre 2010). According to fair housing advocates, the ban disproportionately harms individuals based on their race, national origin, and disability (Adams, 2008).

- http://judiciary.house.gov/_files/hearings/pdf/Seicshnaydre100729.pdf
- http://www.gnofairhousing.org/wp-content/uploads/2012/02/4-04-08_Kenner_Press_Release.html

In 1999, a for-profit company sought to open a group home for Alzheimer's patients in Jefferson Parish, but needed a reasonable accommodation to the zoning in order to operate the property. The group home would have housed five unrelated individuals while the zoning ordinance only permitted four to live within a single-family dwelling. Reasonable accommodations in such cases are required in order to allow people with disabilities equal housing opportunity. The purchase of the property for the group home was contingent on obtaining the reasonable accommodation. Despite recommendations for approval of the variance from the Parish's Department of Inspection

and Code Enforcement and the Parish Attorney's Office, the Parish did not act. The Court found the Parish to have violated the Fair Housing Act by failing to grant the application for a variance and ordered that the Parish open the group home.

- http://www.lawyerscommittee.org/admin/fair_housing/documents/files/St.-Bernard-Memorandum-in-Support-of-Motion-for-Contempt-Injunctive-Relief-and-Sanctions.pdf
- https://scholar.google.com/scholar_case?case=8935245835867601686&hl=en&as_sdt=6&as_vis=1&oi=scholarr

Racial Profiling

The media has documented the use of racial profiling in immigrant communities by Jefferson Parish's local police department. Local law enforcement has worked with unofficial ties to ICE in order to set up raids and checkpoints to uncover immigration status. As documented in other localities in New Orleans, these stops target people based on their national origin according to parish residents.

- http://www.nbcnews.com/news/investigations/does-high-tech-dragnet-deport-immigrants-go-too-far-n40306

In 2002, the Louisiana Supreme Court found that the Jefferson Parish District Attorney's office had used race as a factor in order to eliminate prospective black jurors. A subsequent study in 2003 by the Louisiana Capital Assistance Center reported on jury selection between 1994 and 2002. The report found that Jefferson Parish prosecutors struck prospective black jurors at three times the rate of white jurors. During this time, twenty-two percent of felony trials had all-white juries although nearly a quarter of the parish's population was black.

- http://www.blackstrikes.com/resources/report/black_strikes_report_september_2003.pdf

Between 1979 and 2007, Harry Lee served as Sheriff to Jefferson Parish. During his tenure as sheriff, he made repeated calls to engage in racial profiling, although quickly retracted comments after public backlash. In the 1980s, he "vowed to stop and question blacks" after several robberies by black men of white residents, but said his plan was a mistake the next day. Shortly before his death, Lee was quoted as saying, "We know the crime is in the black community. Why should I waste time in the white community?"

- http://www.npr.org/templates/story/story.php?storyId=6549329

Recent Demographic Trends

No population trends can be discussed without first acknowledging the impact of Hurricane Katrina on the New Orleans region. The 2005 hurricane remains among the most devastating events in American history. The state of Louisiana's official count of those who died as a result of the storm and subsequent levee failures is 1,464 individuals; however, reports suggest a number of unidentified bodies and unsolved missing persons cases that may be Katrina-related are included in that number.[3] Millions of people along the Gulf Coast were displaced. The population of the New Orleans region's core city – New Orleans – fell by more than one-half, and 70 percent of occupied housing units were damaged.[4] The economic toll of Hurricane Katrina is estimated at $135 billion.[5]

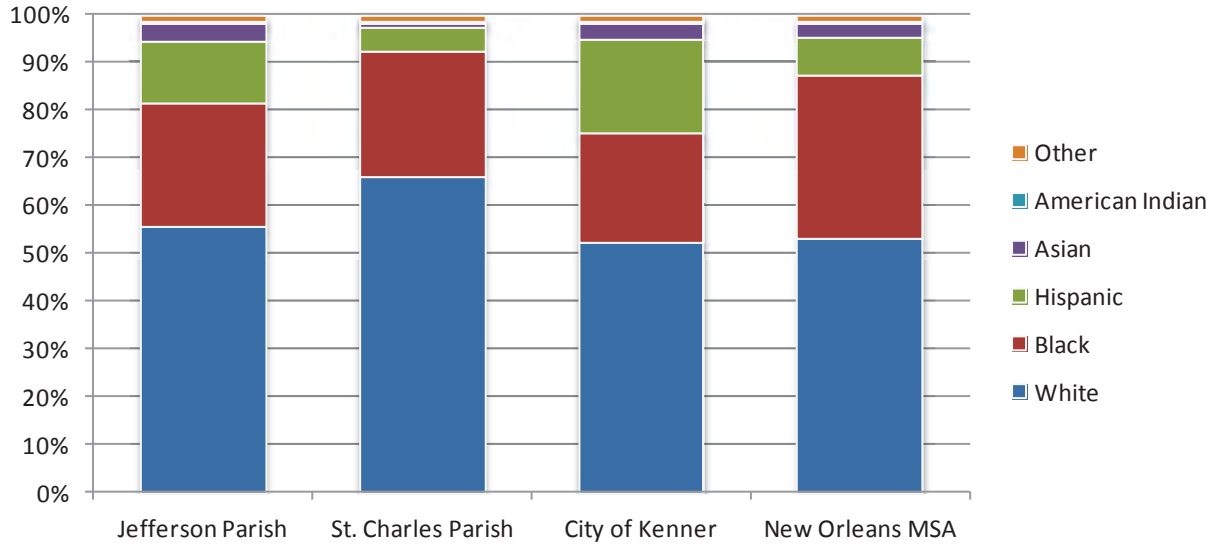
In the 10 years that have passed, many areas have recovered most of the population lost in 2005. In Jefferson and St. Charles parishes, that recovery has been fueled largely by growth in black, Hispanic, and Asian populations.

2009-2013 Estimates

The Census Bureau's 2009-2013 estimates of population distributions indicate that white residents constitute a majority in Jefferson Parish (55.5 percent), St. Charles Parish (66.0 percent), the City of Kenner (52.4 percent), and the New Orleans MSA (53.3 percent). Black residents are the next largest group in all four geographies, with 34.2 percent of the regional population, 26.0 percent of the Jefferson Parish population, and 22.6 percent of the City of Kenner's population.

The Hispanic population is more unevenly distributed, with 7.9 percent of the regional population and just 5.2 percent of the St. Charles population. This is in contrast to Jefferson Parish and the City of Kenner, whose Hispanic populations constitute significantly larger proportions of 12.8 percent and 19.7 percent, respectively.

FIGURE 1: POPULATION DISTRIBUTIONS AS PERCENT OF TOTAL



Source: U.S. Census Bureau, 2009-2013 ACS estimates.

[3] Lise Olson, "5 Years after Katrina, Storm's Death Toll Remains a Mystery," *The Houston Chronicle*, August 30, 2010, http://www.chron.com/news/nation-world/article/5-years-after-Katrina-storm-s-death-toll-remains-1589464.php.
[4] Allison Plyer, "Facts for Features: Katrina Impact" (The Data Center, August 28, 2015), http://www.datacenterresearch.org/data-resources/katrina/facts-for-impact/.
[5] Ibid.

The Asian population remains a smaller proportion of the total, with 2.8 percent of the regional total, 4.0 percent in Jefferson Parish, a very low 0.9 percent in St. Charles, and 3.2 percent in the City of Kenner.

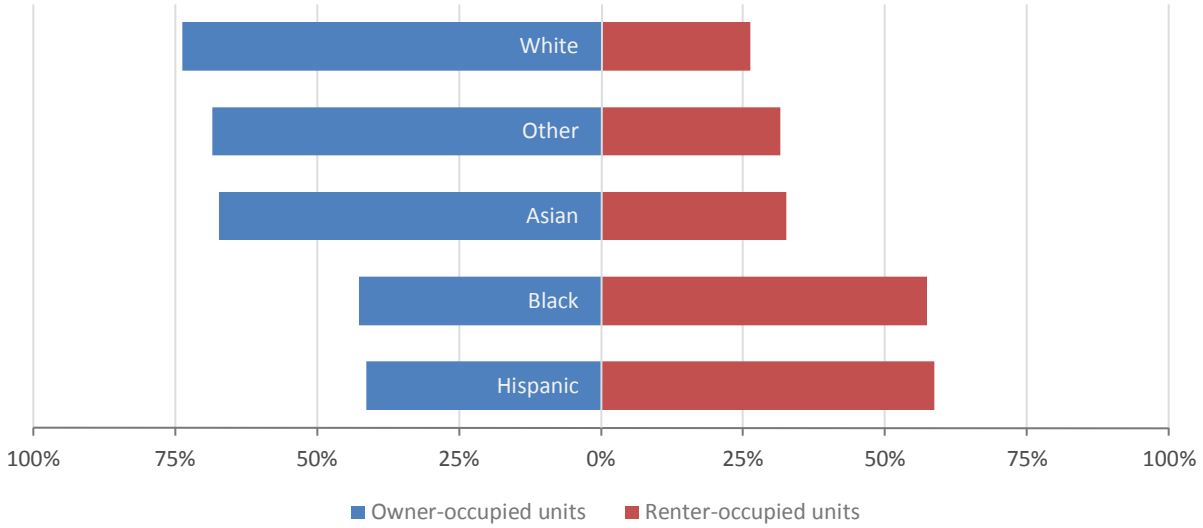
These distributions are not static, and a review of population trends indicates that while Hispanic and Asian populations are smaller, they are also the most rapidly growing groups in the region.

Owner and Renter Occupied Housing

A majority of households in both Jefferson Parish (including the City of Kenner) and St. Charles Parish own their homes. In Jefferson Parish, 62 percent of households are owner-occupied and 38 percent renter-occupied. In St. Charles Parish, 81 percent of households are owner-occupied and 19 percent renter-occupied.

However, home ownership is not uniform across all groups. White households in both parishes own their homes at rates far higher than black or Hispanic households. Nearly 75 percent of white households in Jefferson Parish own their homes, and more than half of black and Hispanic households rent (see Figure 2). This trend is less pronounced in the more rural St. Charles Parish, but the pattern remains (see Figure 3).

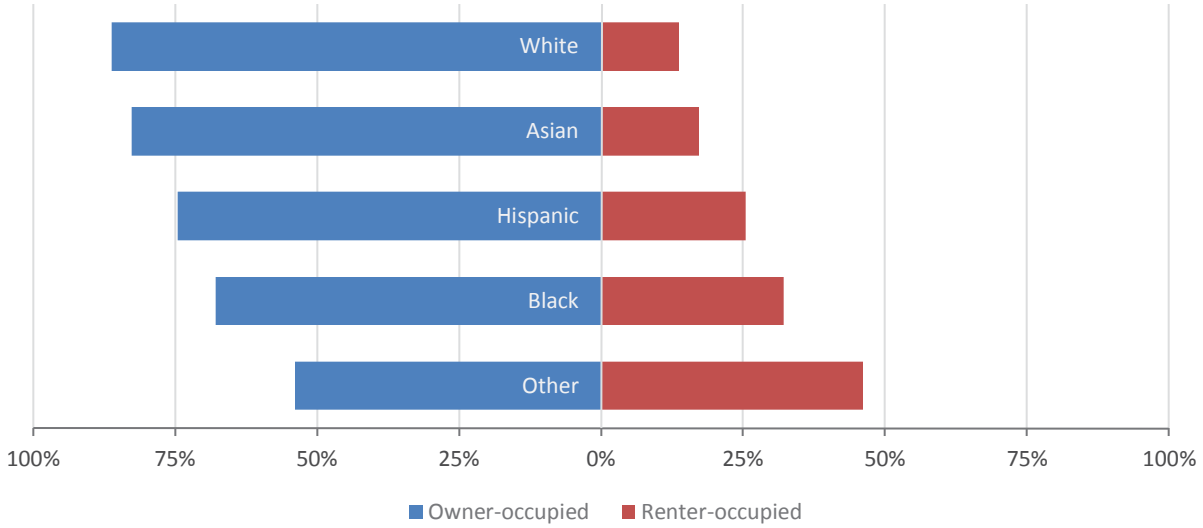
FIGURE 2: JEFFERSON PARISH TENURE BY RACE AND ETHNICITY



Source: U.S. Census Bureau, 2009-2013 ACS estimates.

Rental housing is a necessity for many households that cannot afford to own their homes. Policies that target benefits at households that own their homes are unlikely to benefit low income households to the greatest extent possible. Such policies may also risk placing black and Hispanic households at a disadvantage. Black households rent at rates around twice as high as white households in both Jefferson Parish and St. Charles Parish. Hispanic households rent at rates more than twice as high as white households in Jefferson Parish and almost twice as high in St. Charles Parish.

FIGURE 3: ST. CHARLES PARISH TENURE BY RACE AND ETHNICITY



Source: U.S. Census Bureau, 2009-2013 ACS estimates.

Spatial Distributions

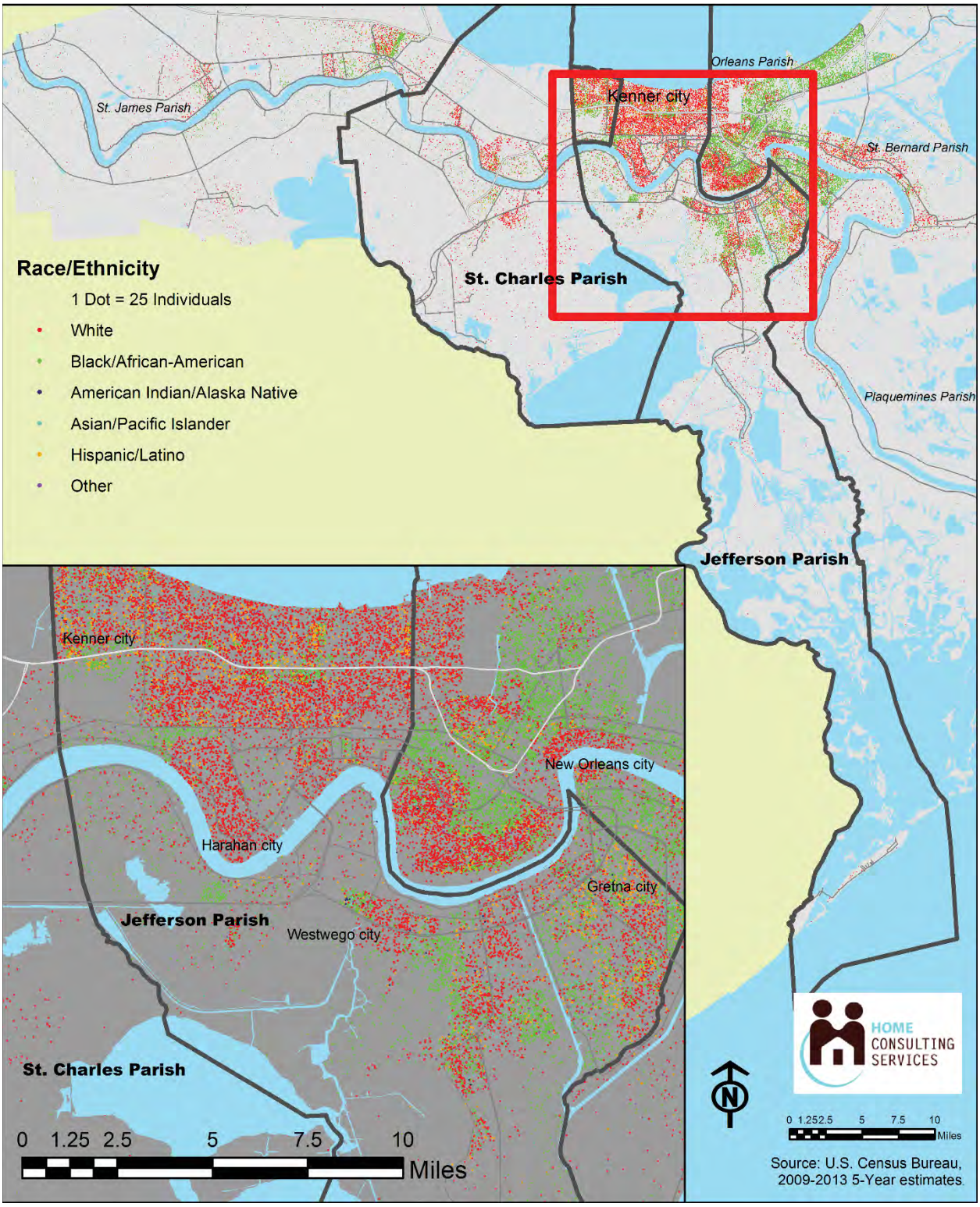
The distribution of people throughout the Jefferson Parish area (and the New Orleans region) suggests that some groups reside in neighborhoods distinct from others. The patterns visible in Map 1 appear to show distinctly segregated areas. This dot-density map shows one dot for each 25 individuals in a neighborhood (a block group, in this instance). Each dot is color coded based by race and ethnicity.

The most visible pattern is a lack of mixing of red and green dots – white and black individuals. The clustering of these dots indicates that while the New Orleans region, Jefferson Parish, St. Charles Parish, and the City of Kenner have relatively diverse overall populations, that diversity is not consistently reflected at the neighborhood level.

This kind of separation may have causes including historical redlining, housing affordability, siting of developments receiving public assistance, disproportionate distribution of community assets, zoning decisions, discriminatory real estate or lending practices, and preferences (both discriminatory and not).

This document addresses issues of segregation and integration in greater detail in its data analysis (see page 34).

MAP 1: SPATIAL DISTRIBUTION OF INDIVIDUALS IN THE JEFFERSON PARISH AREA BY RACE/ETHNICITY



1980 THROUGH 2013

JEFFERSON PARISH

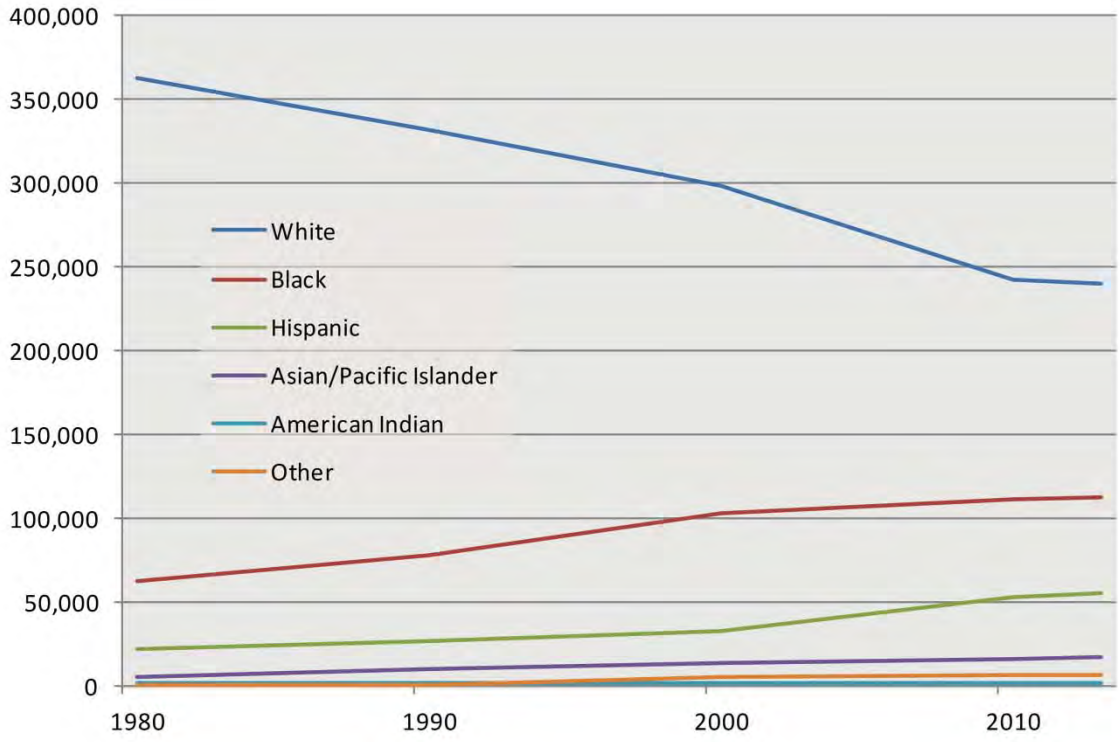
The total population of Jefferson Parish has shown relatively little change from 1980 through 2010. However, the characteristics of the population have shifted significantly. The white population has fallen steadily since 1980 – a pattern only hastened through the first decade of the 2000s. Jefferson Parish's white population contracted by 8 percent between 1980 and 1990 and another 10 percent between 1990 and 2000. That rate of population loss among white residents increased to 19 percent from 2000 to 2010. Overall, the white population of Jefferson Parish fell by 34 percent between 1980 and 2013 from 360,000 to 240,000 people.

White population contraction has contrasted with increases in non-white populations. Jefferson Parish's black population grew by 26 percent between 1980 and 1990 and another 32 percent between 1990 and 2000. That growth slowed to 8 percent between 2000 and 2010. Overall, the black population grew by 81 percent – over 50,000 people – from 1980 to 2013.

The Parish's Hispanic population has grown significantly since 1980. Growth through the turn of the 21st century was steady, at just over two percent annually. That growth increased to an annual rate of 6.6 percent between 2000 and 2010, making it the most rapidly growing segment of Jefferson Parish's population. In total, the Hispanic population of Jefferson Parish has grown by more than 150 percent since 1980, from 22,000 residents to over 55,000.

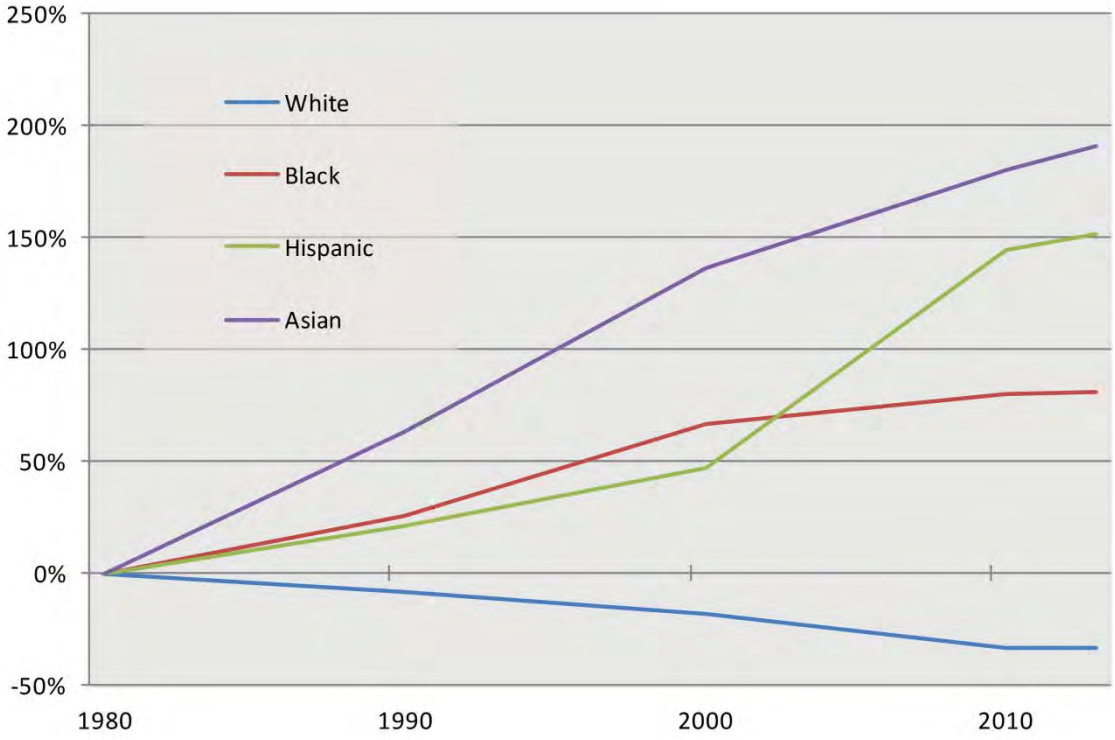
The Asian population has increased from 6,000 people in 1980 to more than 17,000 in 2013. The 191 percent increase is the largest relative growth among groups sorted by race and ethnicity.

FIGURE 4: JEFFERSON PARISH POPULATION COUNTS, 1980 - 2013



Source: Minnesota Population Center, 1980-2010 NHGIS Time Series Tables; U.S. Census Bureau, 2009-2013 ACS estimates.

FIGURE 5: JEFFERSON PARISH PERCENT POPULATION CHANGE SINCE 1980 (BASELINE)



Source: Minnesota Population Center, 1980-2010 NHGIS Time Series Tables; U.S. Census Bureau, 2009-2013 ACS estimates.

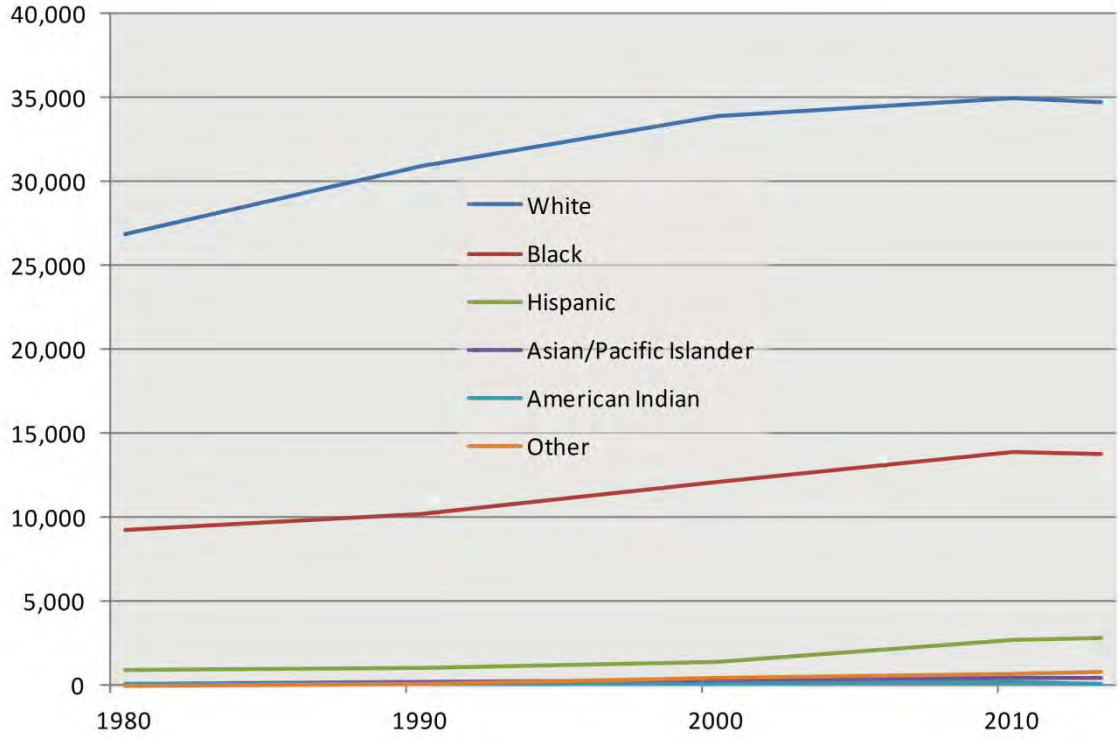
These trends have significantly changed the demographic makeup of the parish. The population has shifted from 80 percent white in 1980 to just over 55 percent white in 2013. The black population has grown from 14 percent to 26 percent of the total population. The Hispanic population has grown from 5 percent to 13 percent of the total population. The Asian population has grown from one to four percent of the total population.

St. Charles Parish

St. Charles Parish has grown steadily since 1980 among all demographic groups. The growth of the parish's white population has slowed each decade since 1980, for an overall growth of 30 percent over 30 years. The black population of St. Charles has grown steadily since 1980, for an overall growth of 50 percent over 30 years. Asian and Hispanic populations have seen increasing growth in recent decades, mirroring national trends. The Hispanic population of St. Charles has grown by around 195 percent since 1980 to 2,760 residents. The Asian population has grown by over 775 percent since 1980 from just 54 residents to nearly 473 residents.

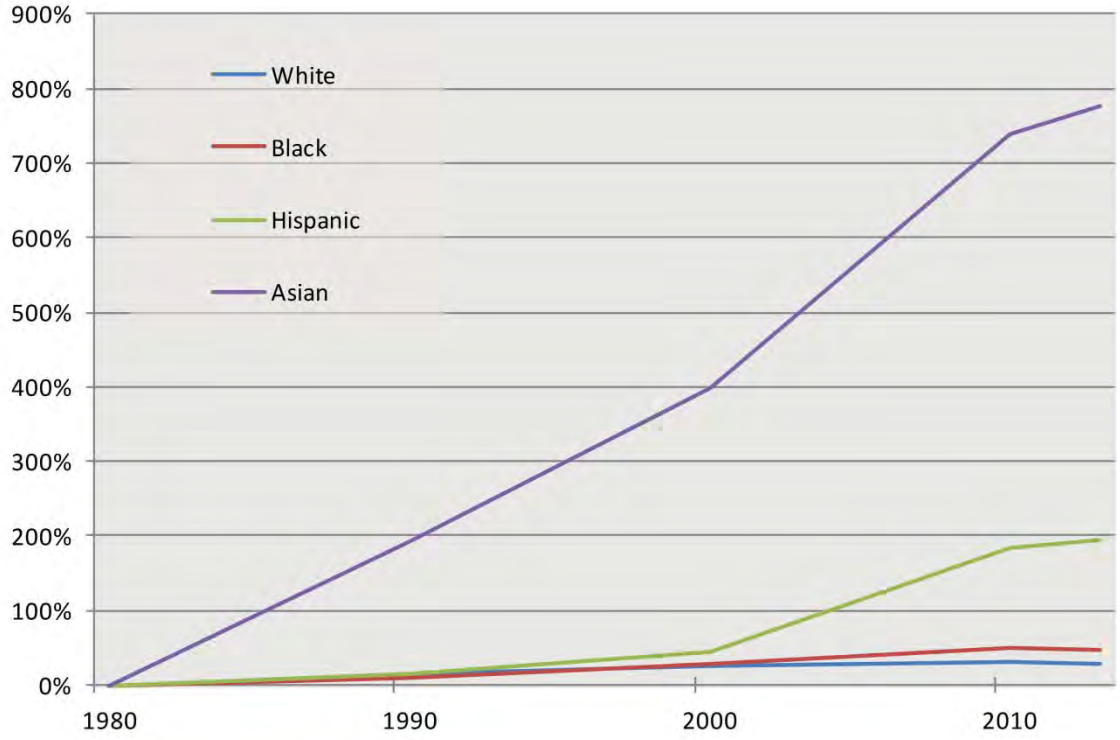
These relatively steady trends are visible in the demographic proportions of the population. The proportion of the population identifying as white has fallen from 72 percent in 1980 to 66 percent in 2010. The proportion of the population identifying as black has increased slightly from 25 percent in 1980 to 26 percent in 2010. The Hispanic population has increased as a proportion of the population from 2.5 percent in 1980 to 5 percent in 2010. And the Asian population has increased from 0.1 percent of the total population in 1980 to 1.0 percent in 2010.

FIGURE 6: ST. CHARLES PARISH POPULATION COUNTS, 1980 - 2013



Source: Minnesota Population Center, 1980-2010 NHGIS Time Series Tables; U.S. Census Bureau, 2009-2013 ACS estimates.

FIGURE 7: ST. CHARLES PARISH PERCENT POPULATION CHANGE SINCE 1980 (BASELINE)



Source: Minnesota Population Center, 1980-2010 NHGIS Time Series Tables; U.S. Census Bureau, 2009-2013 ACS estimates.

Analyses from the U.S. Census Bureau and The Data Center (an arm of Nonprofit Knowledge Works focused on data analysis and community decision-making in Greater New Orleans) have noted that the increases in black and Hispanic proportions of suburban parishes such as Jefferson and St. Charles contrast the shrinking proportion of the black population in urban Orleans Parish. These shifts mirror national population trends.

Economic Conditions

As shown in Table 2, overall median incomes in Jefferson Parish, St. Charles Parish, the City of Kenner, and the New Orleans-Metairie MSA range between $47,300 in the metro region and $58,700 in St. Charles. The median household income in Jefferson Parish and Kenner are each in the $48,000 to $49,000 range, closer to that of the entire region.

Table 3 shows that certain groups have consistently higher median incomes across all jurisdictions and geographies. The median income of white households throughout the region is 128 percent that of all households. The disparity is smaller in Jefferson Parish, St. Charles Parish, and the City of Kenner, with white households earning around 117 percent the median household income of each area. Asian households also have consistently higher median incomes.

Other groups, most notably black households and single female-headed households, have significantly lower median incomes. Black households across all geographies and jurisdictions have median incomes between 64 and 68 percent of the overall median incomes in those geographies. Single female-headed households have median incomes between 52 and 62 percent of the overall median incomes in each geography.

TABLE 2: MEDIAN HOUSEHOLD INCOMES, 2013 DOLLARS

Group	Jefferson Parish	St. Charles Parish	Kenner city	New Orleans-Metairie MSA
All	**48,261**	**58,758**	**48,750**	**47,341**
White (non-Hispanic)	56,157	69,241	56,814	60,635
Black	32,550	37,585	32,965	30,232
American Indian	30,385	*	*	30,399
Asian	54,777	89,861	62,083	51,697
Hawaiian/Pacific Islander	61,411	*	*	*
Hispanic	42,545	62,941	44,241	43,761
Families with children	53,539	66,841	55,689	54,328
Single female-headed household	29,393	30,835	30,230	27,460

Source: U.S. Census Bureau, 2009-2013 ACS estimates.

TABLE 3: MEDIAN HOUSEHOLD INCOMES AS PERCENTILE OF ALL HOUSEHOLDS

Group	Jefferson Parish	St. Charles Parish	Kenner city	New Orleans-Metairie MSA
White (non-Hispanic)	116	118	117	128
Black	67	64	68	64
American Indian	63			64
Asian	114	153	127	109
Hawaiian/Pacific Islander	127			
Hispanic	88	107	91	92
Families with children	111	114	114	115
Single female-headed household	61	52	62	58

Source: U.S. Census Bureau, 2009-2013 ACS estimates.

These disparities are likely to place significant limits on the housing options available to black and single female-headed households.

Reports and data analysis from The Data Center indicate that 2013 median income measures across the region have fallen compared to 1999 measures. Although the region has experienced significant economic distress throughout that time, median income measures have fallen nationwide in the same period.

Federally Assisted Housing

Few housing options exist for low income households, those that do are primarily subsidized by the Federal government. Federal housing subsidies may take the form of direct rental subsidies for low income households or through the Low Income Housing Tax Credit (LIHTC) incentive program. Direct rental subsidies come in the form of public housing, property based Section 8, and the Housing Choice Voucher program. There are currently four public housing authorities (PHA's) in the Jefferson Parish Consortium Area: the Jefferson Parish Housing Authority, the Kenner Housing Authority, St. Charles Parish Housing Authority, and the Housing Authority of the City of Westwego. The number of public housing units and vouchers each PHA maintains is in Table 4 below.

TABLE 4: PUBLIC HOUSING AUTHORITY CHARACTERISTICS

Public Housing Authority	Public Housing Units	Allocated Vouchers	Utilized Vouchers
Jefferson Parish	200	4,830	4,400
City of Kenner	139	1,307	1,215
St. Charles Parish	137	400	235
Westwego	300	0	0

Public housing, originally created as an intermediary for low income workers, has grown into the option of last resort for numerous households. Several years after its creation, mandatory income restrictions were imposed as a requirement of residency essentially ensuring that only the poorest of the poor would be able to gain admission. Given that the much of the public housing stock was sited and built prior to the Civil Rights movement and the passage of the Fair Housing Act of 1968, the majority of units were built in undesirable locations often in conjunction with slum clearance efforts. Presently, the majority of public housing units are found in historically disinvested areas.

TABLE 5: PUBLIC HOUSING HOUSEHOLD CHARACTERISTICS

Public Housing Authority	Housing Development	Total Units	Total People	Average Household Income	Percent of Households Female-headed	Percent of Households Female-headed with Children	Percent of Households with Person(s) with a Disability	Percent Minority	Percent Black
Jefferson Parish	Acre Road	200	522	$14,569	91	53	12	100	100
St. Charles Parish	Boutte-Des Allemands-Hahnville	129	303	$14,725	84	52	8	95	95
City of Kenner	Glenwood	137	418	$13,138	91	71	10	94	94
Westwego	Woodland Acres	126	287	$12,862	83	45	21	87	86
Westwego	Mid City Heights	174	407	$14,908	88	43	21	67	66

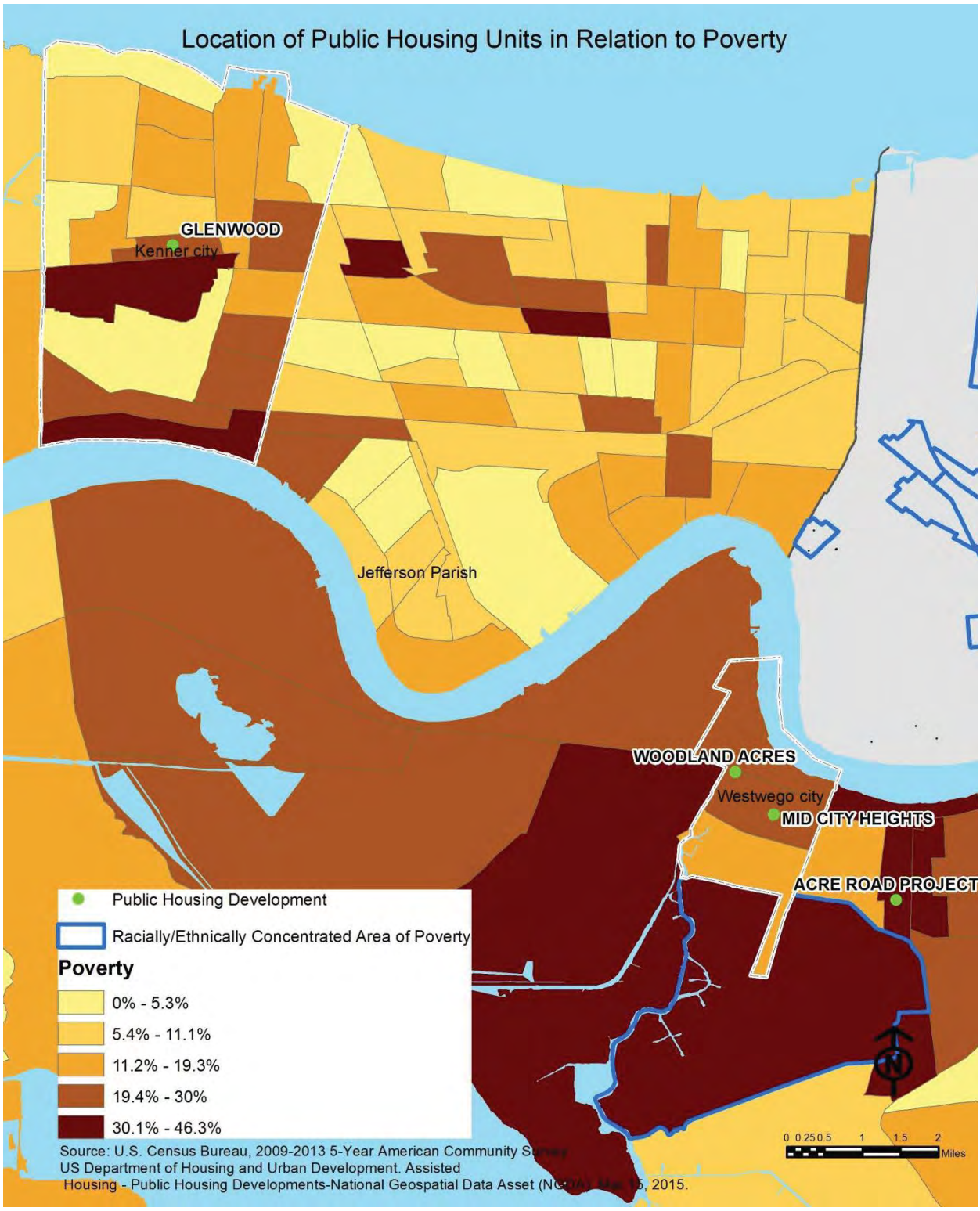
Table 5 above lists key variables for each public housing development. Public housing households within the Consortium are predominantly female headed, roughly half with children, and black. Mid City Heights in Westwego is the only development that is less than 75% minority. Public housing in the Consortium is highly segregated.

Map 2 on page 25 shows the location of each public housing development in relation to the poverty rate of each census tract. Public housing within the Consortium is not found in the highest poverty neighborhoods as typical in other jurisdictions.

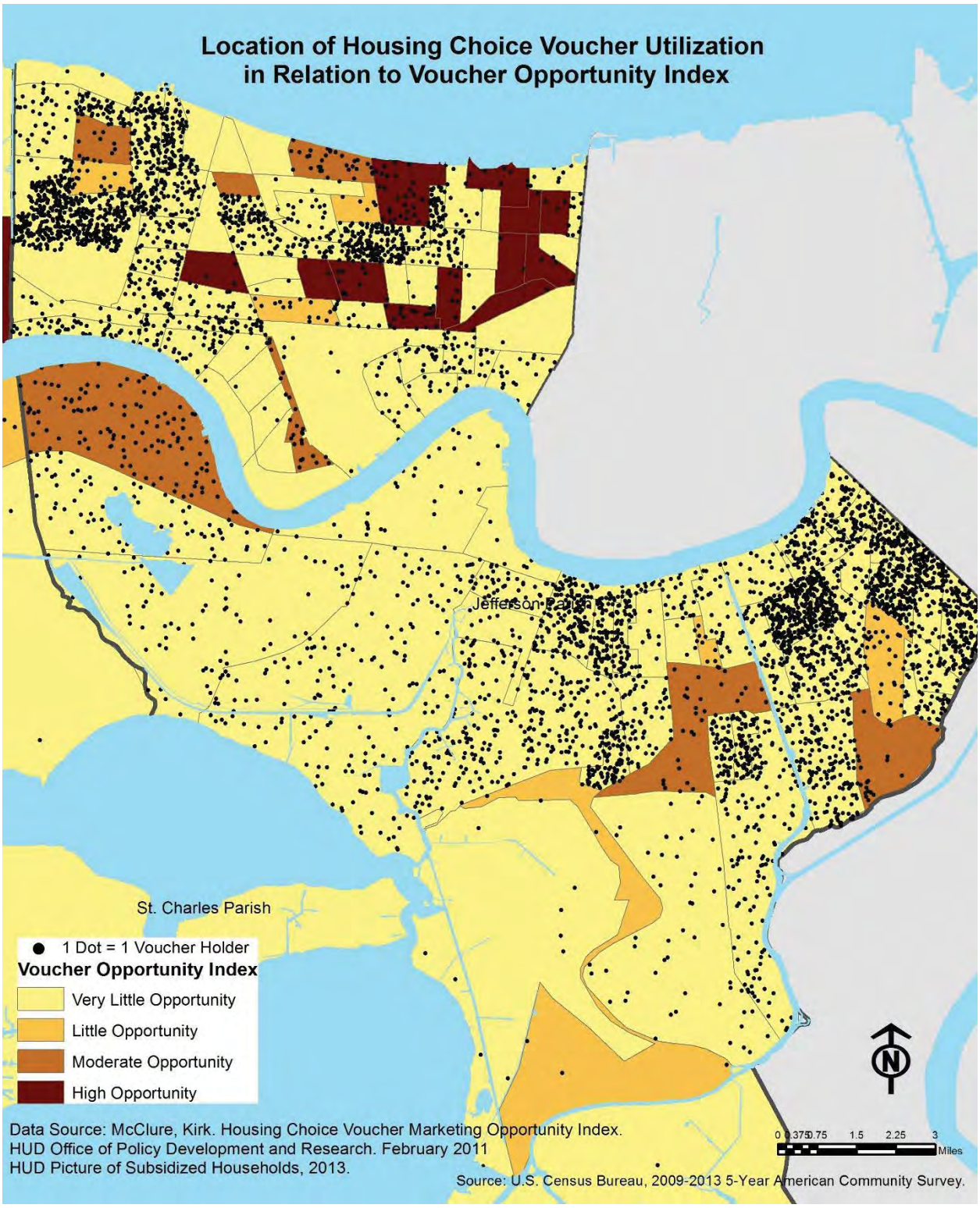
Analysis of Voucher Locations

In 2011, HUD released a report that included an index for every Census Tract in the United States using multiple criteria to measure the housing, demographic, and economic conditions of each tract. The index serves as a measure of each tract's potential opportunities – conditions that are correlated with economic and social mobility – for Housing Choice Voucher holders seeking housing. The conditions used to define opportunity include relatively low poverty rates, availability of rental units offered at rates at or below Fair Market Rent limits, a high level of accessible employment and educational opportunities, and a relatively low density of households receiving public assistance. Map 3 on page 26 uses this index along with Housing Choice Voucher location data from HUD to indicate the ability of Voucher holders to live in neighborhoods with high potential opportunity.

MAP 2: PUBLIC HOUSING UNITS AND NEIGHBORHOOD POVERTY RATES



MAP 3: VOUCHER UTILIZATION BY NEIGHBORHOOD OPPORTUNITY INDEX



Zoning and Land Use

Zoning is legal under the police powers of local governments in order to separate non-compatible land-uses to ensure the health and vitality of residents. However, throughout U.S. history, zoning has also been utilized as a tool to keep racial and ethnic minorities separate from whites. Some of these occurrences have been documented in local media and civil suits. In the years immediately following Katrina, such abuses of land use regulations were highly publicized. Zoning and land use policies must adapt to the needs of a community. There currently exists a very real demand for residential inclusivity across the country, and with it, fair and equitable access to public and community resources and assets such as high performing schools, quality healthcare, healthy food, and green space. This demand has recently been echoed by the Federal government in the new Affirmatively Furthering Fair Housing rule.

The Jefferson Parish Comprehensive Plan highlights a critical dynamic within the Jefferson Parish area. The consortium must balance area housing needs with economic needs in response to demographic changes, decreasing household size, and severe environmental constraints. As such, the parish is tasked with providing a greater diversity of housing types to meet current and future demand. Simultaneously, the population of the area is growing older and the number of individuals with special needs is increasing, presenting new housing challenges.

Residential use is the principal consumer of land in the Jefferson Parish area; single family residential accounting for approximately 70 percent of residential land use.[6] Outside of the incorporated cities, roughly 67 percent of the land is developed, the vast majority of which is located on the West Bank; it is estimated that just 3 percent of land on the East Bank is developable.[7] Moreover, residential development on the West Bank is less dense in light of the fact that 15 percent of residential units are multi-family dwellings.[8] Property values remain lower on the West Bank; however, housing costs continue to increase making affordability a serious issue. Additionally, construction and insurance costs have risen in the post-Katrina years making it increasingly difficult to rehabilitate existing structures or build new. Several community members as well as non-profit developers expressed concern that though there still remains vacant, affordable housing stock, the cost of elevating these structures in order to acquire homeowners insurance was a major barrier to converting that property to its best and highest use.

In light of these factors, a review of the current zoning ordinance was undertaken to identify any issues which may prevent or hinder the goals and objectives as set forth in the Comprehensive Plan. Identifying and addressing relevant zoning issues will ensure that local ordinances meet the goals of the Comprehensive Plan as listed below:

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[6] Jefferson Parish, Louisiana and the New Orleans Regional Planning Commission. Prepared by University of Washington Department of Urban Planning and Design. Implementing Envision Jefferson 2020: Mixed Use and Smart Growth Alternatives. June 2006.
[7] Ibid.
[8] Ibid.

Goal 1. Preserve and revitalize existing housing and neighborhoods.
Goal 2. Promote a diverse range of housing opportunities, by type, size, density, cost, and location, consistent with demand and need.
Goal 3. Identify and eliminate or streamline regulatory barriers to the provision, maintenance and improvement of housing.
Goal 4. Increase the supply of housing which is affordable to low and moderate income households.
Goal 5. Promote housing opportunities for special needs groups, including the elderly and persons with disabilities.
Goal 6. Support development practices that promote attractive housing choices.
Goal 7. Promote non-discriminatory equal access housing opportunity.

Definitions for individual uses and by-right uses were reviewed in all zoning classifications. Several issues were identified which have the potential to limit housing choice for individuals.

1. The definition of "Family" as defined below has the potential to disparately impact specific groups:

Family shall mean one (1) or more persons related by blood or marriage living together and occupying a single housekeeping unit with single culinary facilities or a group of not more than four (4) persons living together by mutual agreement and occupying a single housekeeping unit with single culinary facilities on a non-profit cost-sharing basis. Domestic servants resident on premises shall be considered as part of the family. A second culinary facility may be permitted only as provided in Article VI, Single-Family Residential District - R-1A.

This definition distinguishes between related and unrelated persons as well as imposes numerical limits on the number of persons residing together.[9] In light of changing demographic patterns and the ways in which different groups cohabitate, the current definition of family, in particular, defining family as related by blood, marriage, or not more than four (4) persons could disparately impact certain groups of individuals.

A recommended definition of family is:

One or more persons living together as a single housekeeping unit in a dwelling unit.[10]

An additional recommendation is to define "Single housekeeping unit" as follows:

One person or two or more individuals living together sharing household responsibilities and activities which may include, sharing expenses, chores, eating evening meals together and participating in recreational activities and having close social, economic and psychological commitments to each other.[11]

2. Board and Care homes are allowed by right in nearly every residential zoning district with the exception of those districts that are limited to single family dwellings: Suburban District S-1, Single Family Residential R-1A, Suburban Residential R-1B, Rural Residential R-1C, and Rural Residential R-1D. This by right exclusion limits the ability of people with disabilities to access group living arrangements that enable them to secure the supports they need to live in the community.[12] In light of the increasing elderly and disabled populations, granting by right access to the largest

[9] Mental Health Advocacy Services, Inc. Fair Housing Issues in Land Use and Zoning: Definitions of Family and Occupancy Standards. FHIP Grant # FH-70094-00097. September 1998.
[10] Ibid.
[11] Ibid.
[12] Ibid.

array of housing in the area will not only enhance the quality of life of these populations but directly address Goals 2, 5, and 7 of the Comprehensive Plan.

Household Characteristics and Housing Types

Building and maintaining housing can be costly. Single-family housing units are the least efficient in terms of cost per household served. Multifamily buildings allow developers to build a greater number of housing units for less cost per unit. That cost savings is necessary to create a supply of housing that meets the needs and income characteristics of all residents.

Data indicates that non-white households are more likely to live in multifamily buildings (five or more units in the structure). Approximately 24 percent of black households live in multifamily buildings, and almost 30 percent of Hispanic households live in multifamily buildings. In Jefferson Parish, just over 12 percent of white households live in multifamily structures. Limitations on multifamily development in specific neighborhoods may disproportionately impact the ability of black and Hispanic households to live in such neighborhoods.

TABLE 6: JEFFERSON PARISH HOUSEHOLD TENURE BY RACE

Race/Ethnicity	Total occupied units	Percent of households by type of structure				
		1 unit in structure	2 units in structure	3 or 4 units in structure	5 or more units in structure	Mobile home or other
Non-Hispanic White	102,001	80.4%	2.7%	3.3%	12.3%	1.3%
Black	41,061	57.9%	6.1%	11.1%	24.0%	1.0%
Hispanic	17,061	50.2%	6.1%	12.3%	29.1%	2.3%
Asian	5,391	71.5%	1.4%	5.8%	17.2%	4.2%
American Indian	786	62.5%	4.8%	0.0%	28.5%	4.2%
Native Hawaiian	84	91.7%	0.0%	0.0%	8.3%	0.0%
Other	4,560	44.9%	6.7%	18.3%	27.8%	2.4%
Two or more	2,180	62.7%	4.9%	3.7%	26.1%	2.6%

Source: U.S. Census Bureau, 2009-2013 ACS estimates.

TABLE 7: ST. CHARLES PARISH HOUSEHOLD TENURE BY RACE

Race/Ethnicity	Total occupied units	Percent of households by type of structure				
		1 unit in structure	2 units in structure	3 or 4 units in structure	5 or more units in structure	Mobile home or other
Non-Hispanic White	12,847	86.5%	0.8%	2.6%	2.2%	7.9%
Black	4,577	63.9%	4.2%	11.8%	6.8%	13.3%
Hispanic	808	72.5%	3.2%	1.4%	6.2%	16.7%
Asian	133	82.7%	0.0%	17.3%	0.0%	0.0%
American Indian	30	60.0%	0.0%	0.0%	0.0%	40.0%
Native Hawaiian	10	100.0%	0.0%	0.0%	0.0%	0.0%
Other	185	23.2%	49.7%	0.0%	27.0%	0.0%
Two or more	98	76.5%	13.3%	0.0%	0.0%	10.2%

Source: U.S. Census Bureau, 2009-2013 ACS estimates.

Multifamily use By-Right

Residential zoning ordinances may address the potential development of multifamily dwellings in one of three ways:

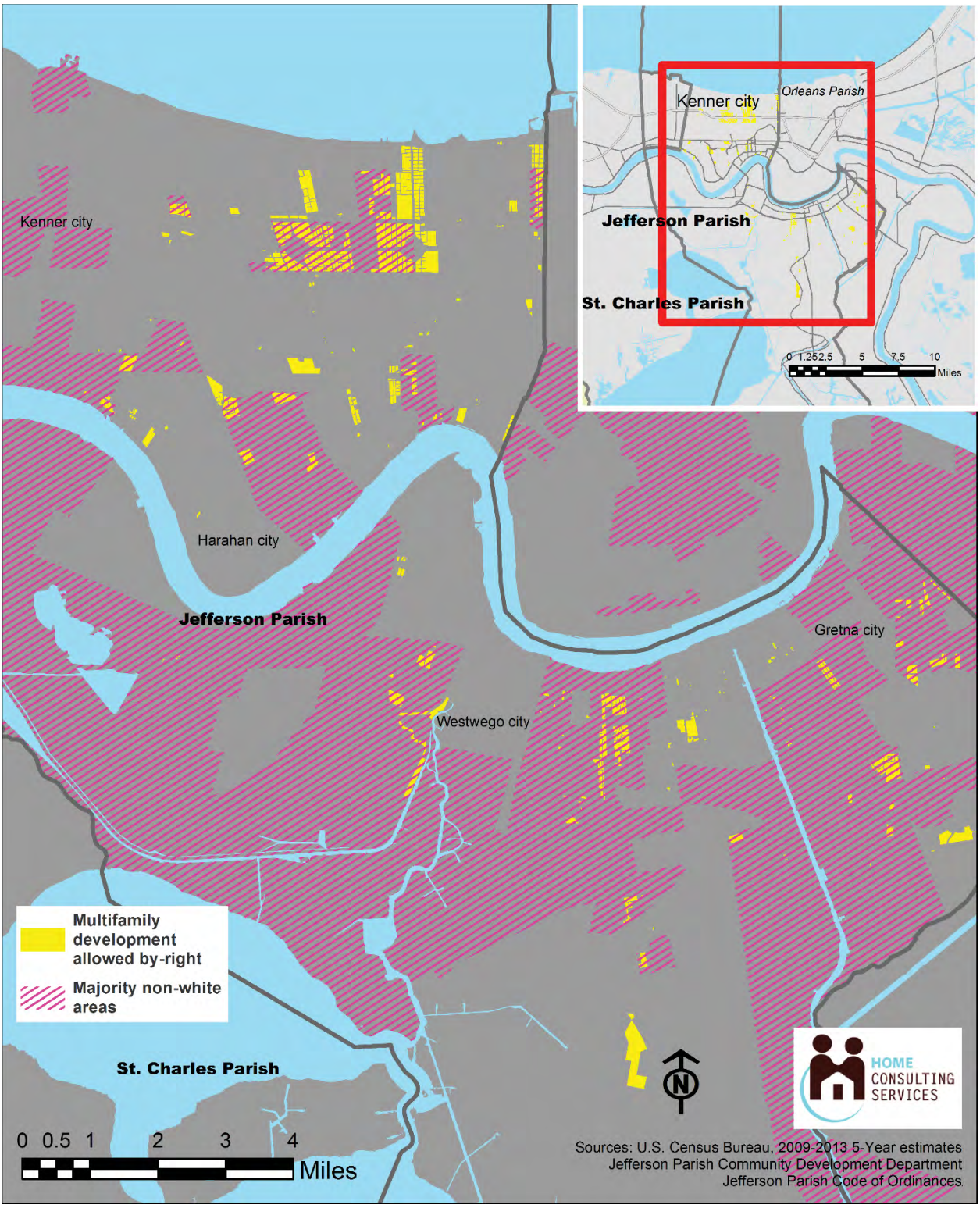
1. Allowed by-right: Multifamily dwellings may be approved by administrative staff, rather than requiring the permission of the Parish or City Council.
2. Allowed conditionally: Multifamily dwellings must meet certain development conditions and be approved by a legislative body such as Parish Council.
3. Not allowed: Development of multifamily dwellings in these areas would require a more intensive and difficult rezoning process, which must be approved by Parish or City Council.

Zoning that does not allow for multifamily residential use by-right increases the development time and costs. By-right multifamily use allows for more affordable development. However, clustering by-right multifamily uses within particular neighborhoods (our outside of particular neighborhoods) can contribute to segregated housing patterns.

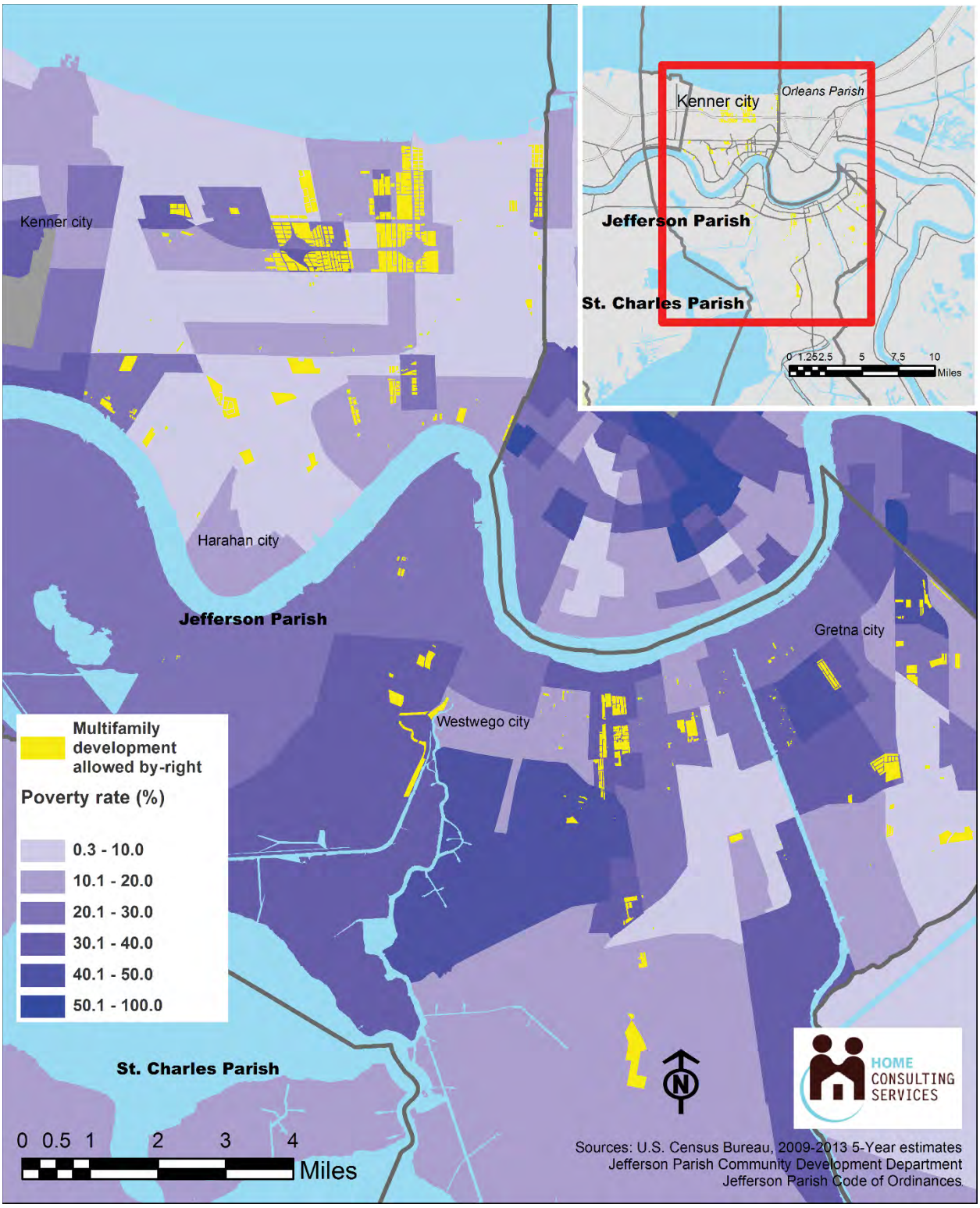
Most Jefferson Parish areas zoned for multifamily development by-right are located near more trafficked intersections and arterial roads. Many of these areas overlap with non-white neighborhoods (see Map 4 on page 31), and several clusters overlap with higher poverty neighborhoods (see Map 5 on page 32). However, there are multifamily-zoned areas in both majority-white and very low poverty neighborhoods.

Areas that allow for multifamily development by-right constitute approximately six percent of all land zoned for some form of by-right residential use (including Business Core Districts that allow for dense multifamily by-right). Due to the cost efficiencies in developing multifamily residential units, these areas likely offer the greatest levels of affordability to lower income households.

MAP 4: MULTIFAMILY ZONING AND NON-WHITE NEIGHBORHOODS



MAP 5: MULTIFAMILY ZONING AND NEIGHBORHOOD POVERTY RATES



Data Analysis

Patterns of Integration and Segregation

The connected goals of eliminating segregated housing patterns and promoting integrated neighborhoods are among the primary objectives of the Fair Housing Act's mandate that HUD affirmatively furthers the Act's purposes. The passage of the Fair Housing Act in 1968 made explicit segregation illegal, but it did not remedy the implicit causes and effects thereof. In certifying that they are Affirmatively Furthering Fair Housing, entitlement communities indicate that they take an active role in identifying and addressing segregation.

The Dissimilarity Index

The spatial segregation of different groups is measured by looking at the distribution of groups across an area. There are multiple measures that describe different aspects of group distribution, but the dissimilarity index is among the most frequently used and accepted measures. The dissimilarity index compares the distribution of two groups across the component parts of a larger geography. It may compare the distributions of different races and ethnicities to the majority population, individuals with disabilities to those without, immigrant populations to native-born, or other characteristics. The resulting measures indicate to what extent the parts of an area are characteristically similar (or dissimilar) to the whole. It may be thought of as a measure of how evenly groups are dispersed throughout an area. The resulting number indicates the percentage of either group that would need to relocate to neighborhoods in which that group is underrepresented in order to achieve neighborhood distributions equivalent to the overall distribution.

This analysis compares the spatial distribution of certain protected characteristics across block groups within Jefferson Parish (including the City of Kenner), St. Charles Parish, and the New Orleans MSA. If the composition of each block group mirrors that of the larger area or region, the dissimilarity index of the area would be at or near 0.00, or complete integration.

For example, if a parish's combined African-American and white population is 45 percent African-American and 55 percent white, and if the population of each neighborhood (Census tract) within the parish is 45 percent African-American and 55 percent white, the parish will have a 0.00 white-black or black-white dissimilarity index.

Conversely, if the same parish is comprised of neighborhoods that are either 100 percent African-American or 100 percent white, the parish will have a 1.00 white-black or black-white dissimilarity index, indicating complete segregation. The 1.00 measure indicates that either the entire white population would need to relocate to black neighborhoods or the entire black population would need to relocate to white neighborhoods in order to achieve neighborhood distributions equivalent to the parish distribution.

Dissimilarity indices below 0.40 are considered indicative of low levels of segregation, according to HUD. Indices between 0.40 and 0.55 indicate moderate levels of segregation. Indices above 0.55 signal high levels of segregation.

Index measures vary depending on the composition of the larger geography. The dissimilarity index of block groups in a single county may indicate low levels of segregation. However, the same index may be higher when measured at a regional scale that includes surrounding counties and cities. Likewise, a region with a low to moderate dissimilarity index may contain a jurisdiction that exhibits a higher dissimilarity index when measured separately.

Racial and Ethnic Patterns

Measures of dissimilarity suggest that segregation is a significant issue in the greater New Orleans region. The black/white dissimilarity index for the region is a very high 0.67, suggesting that 67 percent of the black population would need to move into other neighborhoods to achieve neighborhood distributions equal to the overall distribution.

The regional nonwhite/white dissimilarity index of 0.57 is also indicative of high segregation. This appears to be driven by the significant black/white segregation, as the Hispanic/white index of 0.38 and the Asian/white index of 0.50 are both low to moderate indicators of segregation.

Jefferson Parish – measured independently of the region – also demonstrates high measures of segregation among black and white populations. The black/white dissimilarity index for Jefferson Parish is 0.56, just over HUD's criteria for high segregation. The Hispanic/white index of 0.37 suggests low segregation among those populations. And the Asian/white index of 0.41 suggests moderate segregation.

St. Charles Parish demonstrates relatively low levels of segregation among all groups, though the black/white index of 0.47 suggests moderate segregation remains. Hispanic/white and Asian/white indices of 0.27 and 0.36 both suggest low segregation.

Segregation among black and white residents is a clear fair housing issue in the New Orleans region as a whole and Jefferson Parish individually. The findings suggest that black residents of these areas likely do not experience fair housing choice. Although a number of factors contribute to patterns of segregation – including poverty, access to

TABLE 8: DISSIMILARITY INDEX, NEW ORLEANS MSA 2010

Group 1	*Group 2*	*Dissimilarity Index*	*HUD-based segregation level* [1]
White	**Non-white**	**0.573**	**High Segregation**
White	**Black**	**0.668**	**High Segregation**
White	**Hispanic**	**0.380**	**Low Segregation**
White	**Asian**	**0.496**	**Moderate Segregation**

TABLE 9: DISSIMILARITY INDEX, JEFFERSON PARISH 2010

Group 1	*Group 2*	*Dissimilarity Index*	*HUD-based segregation level* [1]
White	**Non-white**	**0.434**	**Moderate Segregation**
White	**Black**	**0.559**	**High Segregation**
White	**Hispanic**	**0.365**	**Low Segregation**
White	**Asian**	**0.407**	**Moderate Segregation**

TABLE 10: DISSIMILARITY INDEX, ST. CHARLES PARISH 2010

Group 1	*Group 2*	*Dissimilarity Index*	*HUD-based segregation level* [1]
White	**Non-white**	**0.401**	**Moderate Segregation**
White	**Black**	**0.468**	**Moderate Segregation**
White	**Hispanic**	**0.265**	**Low Segregation**
White	**Asian**	**0.361**	**Low Segregation**

[1] U.S. Department of Housing and Urban Development, *AFFH Data Documentation* (HUD-2013-0066-003), June 2013, <www.regulations.gov/#!documentDetail;D=HUD-2013-0066-0003>.

education resources, employment, transportation, and wealth-building opportunities – segregation itself perpetuates those factors.

Patterns of Poverty

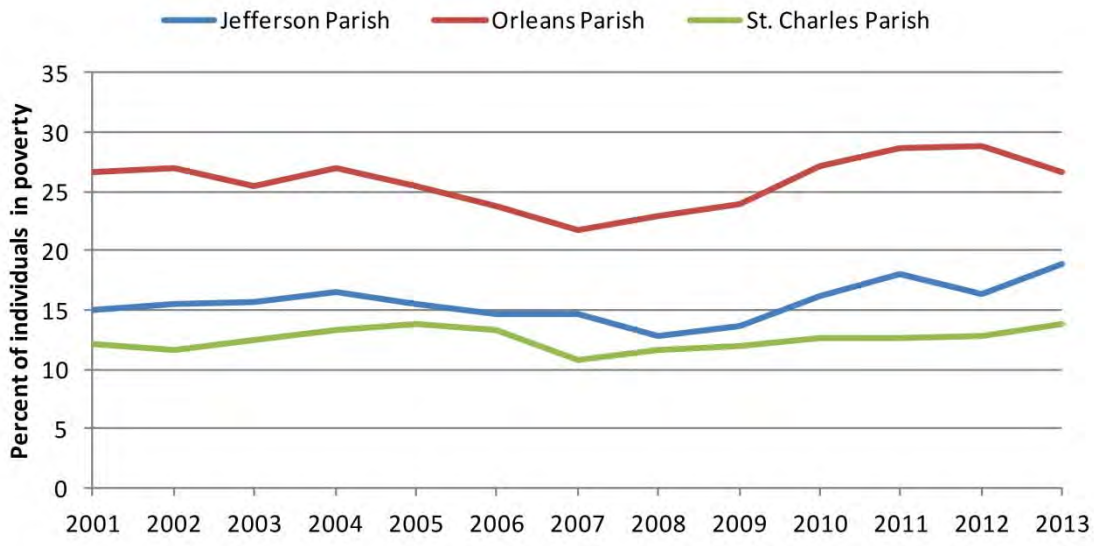
Research has linked poverty to a number of negative social indicators and health outcomes, including low birth weights in children, higher dropout rates and diminished academic achievement among teenagers, and exposure to environmental contaminants (such as air pollution and lead paint) and neighborhood violence. Poverty limits the capacities of adults to care for their families, and it severely disadvantages children from birth.

Nationally, growth in poverty rates and populations have suggested a shift from urban cores to suburban neighborhoods, parishes, and counties – a trend described as "the suburbanization of poverty"[13]. Although poverty rates in urban cities have experienced growth, the rate of growth has been higher in suburban counties and parishes. The poverty dynamics of the New Orleans region reflect this trend, with little long-term growth in Orleans Parish and moderate but visible growth in Jefferson Parish (see Figure 8). However, the influences of post-Katrina housing costs, flood insurance, and losses of public housing are likely also factors. The large decreases in poverty rates and the number of individuals in poverty between 2005 and 2006 shown in Figure 9 suggest individuals in poverty experienced severe dislocation in the months and years after Hurricanes Katrina and Rita.

The overall poverty rate in Jefferson Parish has grown from 15.0 percent in 2001 to 18.9 percent in 2013. The majority of that growth has taken place since 2009, when the poverty rate was an estimated 13.7 percent. That increase equates to an additional 14,527 people in poverty.

The poverty rate of St. Charles Parish has been slower to increase, rising just 1.6 points from 12.2 percent to 13.8 percent from 2001 to 2013. As with Jefferson Parish, the most significant growth has occurred in the post-Katrina years. The poverty rate increase equates to 1,235 additional individuals in poverty.

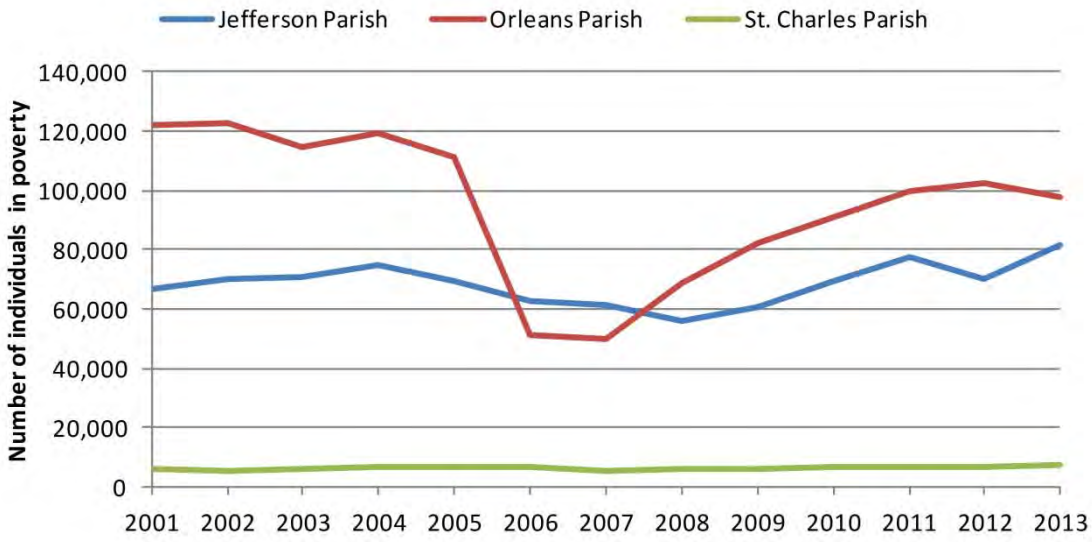
FIGURE 8: POVERTY RATES, 2001-2013



Source: U.S. Census Bureau, Small Area Income and Poverty Estimates.

[13] Emily Garr and Elizabeth Kneebone, "The Suburbanization of Poverty: Trends in Metropolitan America, 2000 to 2008," Paper, Metropolitan Opportunity Series (Washington, D.C.: The Brookings Institution, January 2010), http://www.brookings.edu/~/media/research/files/papers/2010/1/20-poverty-kneebone/0120_poverty_paper.pdf.

FIGURE 9: NUMBER OF INDIVIDUALS IN POVERTY, 2001-2013



Source: U.S. Census Bureau, Small Area Income and Poverty Estimates.

By comparison, the poverty rate of Orleans Parish in 2013 is estimated at 26.6 percent, or roughly equivalent to its 2001 poverty rate of 26.7 percent. The poverty rate dropped as low as 21.8 percent in 2007, but grew to 28.7 percent in 2011 before falling again to 26.6 percent. These changes in poverty rates are related to both increases and decreases in the numbers of people in poverty, but also to overall population trends. Orleans Parish had 24,409 fewer residents in poverty in 2013 than it did in 2001.

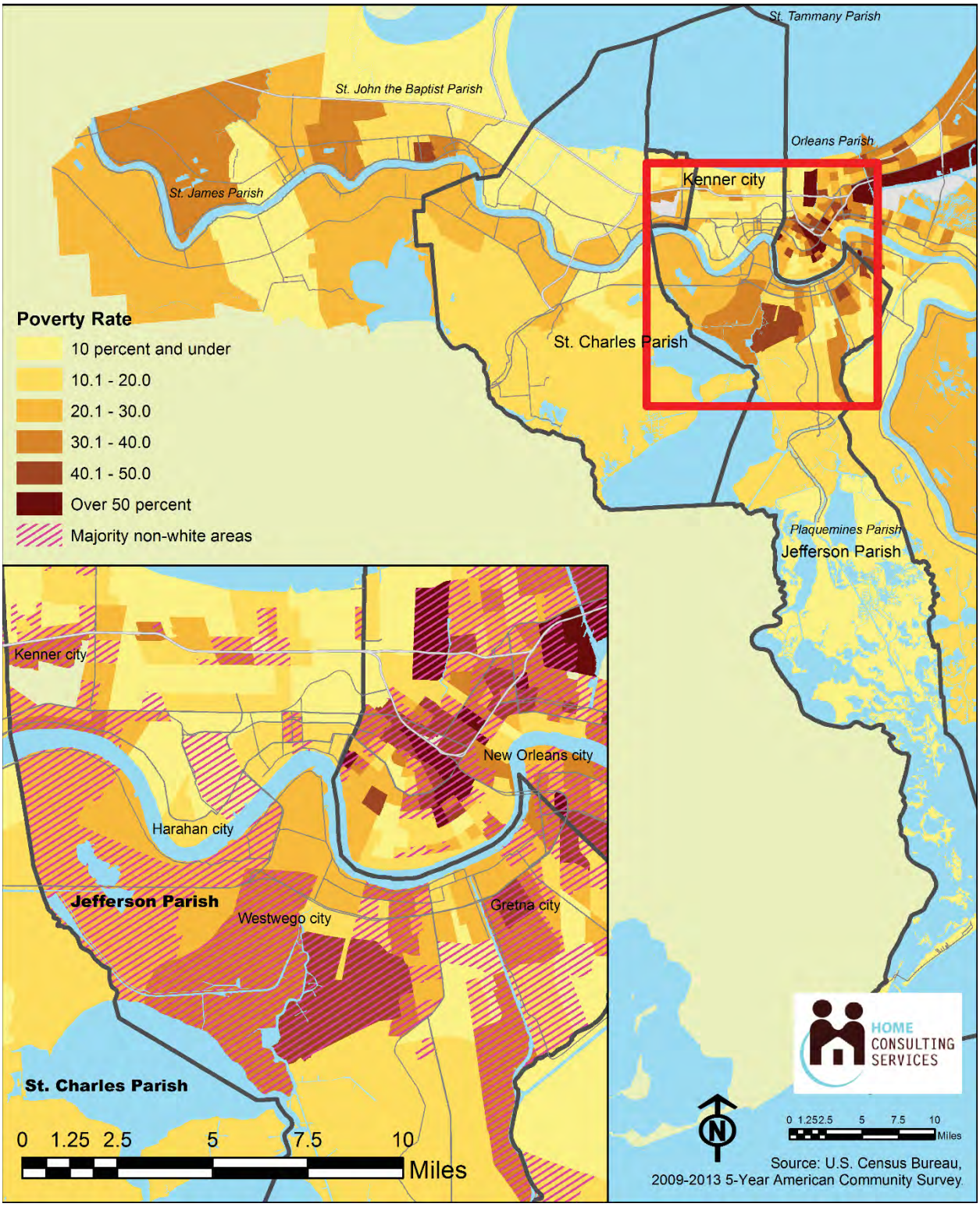
Equally important as how many individuals experience poverty is where poverty is located. Understanding the spatial dimensions of poverty allows a better understanding of neighborhood needs and assets, affected populations, and how best to target assistance.

Regionally, the most deeply felt poverty – the areas with poverty rates greater than 50 percent – are located in Orleans Parish (see Map 6). Across the region, neighborhoods with greater rates of poverty are often those with majority non-white populations. Jefferson Parish has several neighborhoods with poverty rates greater than 40 percent, all of which meet HUD's definition of Racially or Ethnically Concentrated Areas of Poverty (RCAP/ECAP).

Concentrated poverty serves as a barrier to the mobility of many households. Without access to quality education, employment, health, and transportation resources, families have few opportunities to escape the cycle of poverty. When poverty is disproportionately concentrated in communities of particular races or ethnicities, the impacts extend to those entire communities, exacerbating segregation. Racially or ethnically concentrated poverty represents a fair housing issue.

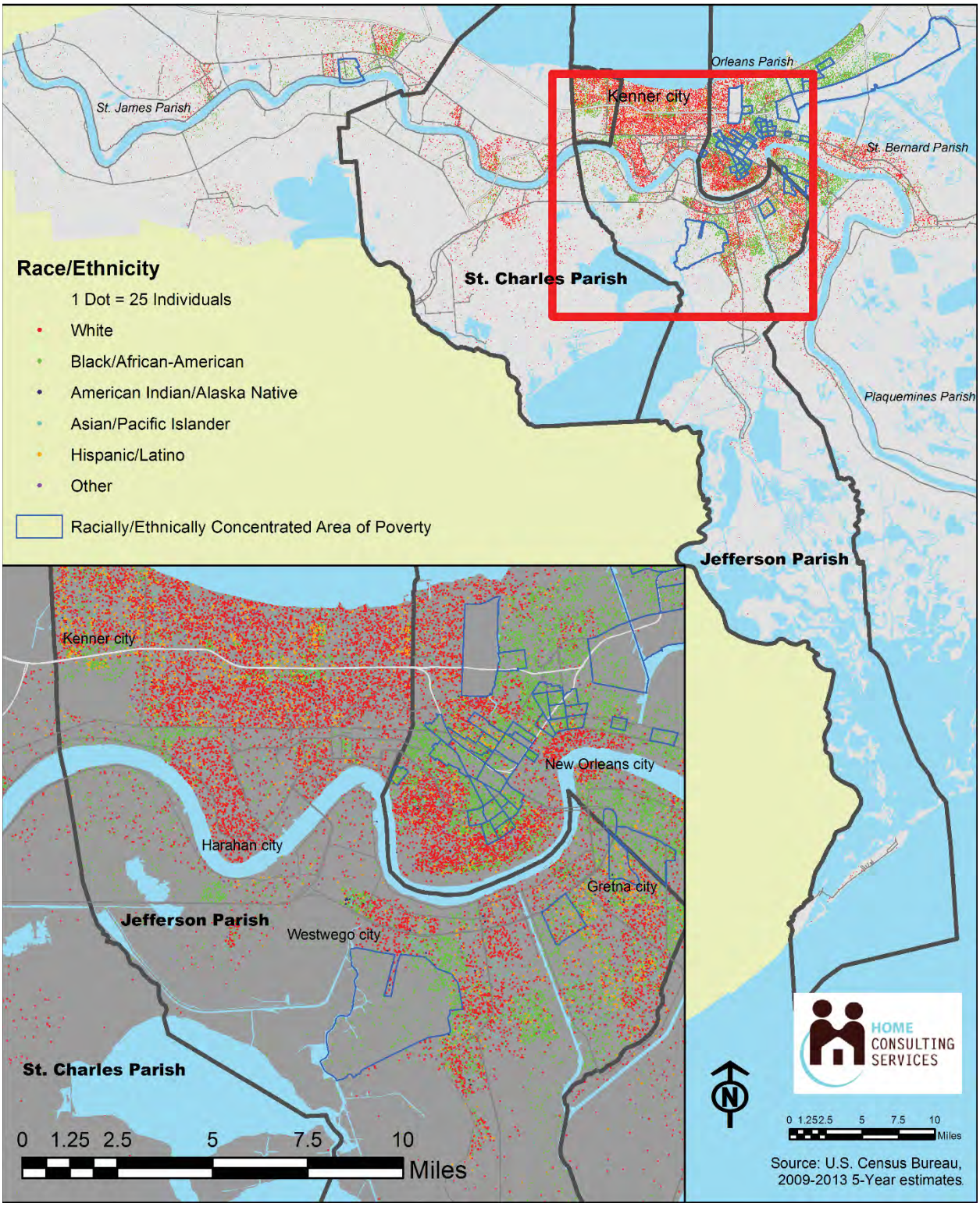
Present-day spatial patterns of racially and ethnically concentrated areas of poverty often reflect historical patterns of segregation, redlining, and other institutional policies that have excluded protected classes. An RCAP/ECAP is defined by HUD as an area in which at least 50 percent of its population is non-white and the percent of individuals living at or below the poverty line is disproportionately high (40 percent or three times the average poverty rate of all census tracts in the area, whichever is lower).

MAP 6: POVERTY RATES IN THE JEFFERSON PARISH AREA



The bulk of racially/ethnically concentrated areas of poverty within the New Orleans MSA are located in the City of New Orleans. Outside of New Orleans, Jefferson Parish has three Census tracts that qualify as R/ECAPs. These tracts cover portions of Terrytown, Harvey, and Marrero, with poverty rates between 40 and 46 percent. Approximately

MAP 7: RACIALLY AND ETHNICALLY CONCENTRATED AREAS OF POVERTY, 2009-2013 ESTIMATES



12,500 individuals reside within these areas, 73 percent of whom identify as black or African American, 12 percent of whom identify as Hispanic, and 12 percent of whom identify as white. Approximately eight percent of Jefferson Parish's black population resides in an RCAP/ECAP.

Disproportionate Housing Needs

The safety, quality, and affordability of housing are important factors in assessing fair housing choice. Dwellings that are overcrowded, unaffordable, or missing kitchen or plumbing facilities are unlikely to adequately meet the needs of households and families seeking housing. When members of a particular racial or ethnic group experience these needs at rates disproportionately higher than other groups of similar income levels, it represents a fair housing issue.

Housing needs are determined through analysis of HUD's Comprehensive Housing Affordability Strategy (CHAS) data, which identifies households by race and income experiencing one or more of four different housing difficulties:

- Cost burden: monthly housing costs (including utilities) exceed 30 percent of a household's monthly income
- Incomplete kitchen facilities
- Incomplete plumbing facilities
- Overcrowding: more than one person per room

Households with lower incomes experience housing difficulties and needs at higher rates than those with higher incomes. However, white households often experience housing needs at lower rates than black, Hispanic, and Asian households earning similar incomes do.

Table 11 shows the percent of all households in each income group experiencing housing needs. It also shows the rates at which each race and ethnicity group experiences those needs in terms of their relation to the baseline of all households (number of percentage points above or below the baseline). Groups experiencing needs at rates more than 10 points higher than the total population are considered to have disproportionate need. Those disparities are highlighted within the table.

In Jefferson Parish, no disparities in housing needs are apparent among extremely low income households (earning less than 30 percent of the area median income), where need is significant among all groups. Among very low income households (earning 30 to 50 percent of the area median income), black and Hispanic households experience housing needs at rates disproportionately high when compared to all very low income households. Need is disproportionately high among Hispanic households and multiple-race households earning between 50 and 80 percent of the area median income. Asian households earning close to the area median income (80 to 100 percent) have disproportionate housing needs.

Due to the smaller populations in St. Charles Parish, analysis of Hispanic, Asian, and other households at most income levels is not productive. However, among the larger white and black population groups, black households at extremely low and very low income levels (between 30 and 80 percent of the area median income) experience disproportionate housing need.

By comparison, Orleans Parish demonstrates relatively few disparities. No single group experiences housing problems at a rate greater than 10 points higher than the overall rate. White households appear to experience greater housing needs at income levels approaching the area median, but the difference is just below the 10 point threshold.

TABLE 11: DISPROPORTIONATE HOUSING NEEDS

Household income (as a percent of the area median)	Households with housing problems (baseline)	Point difference from baseline by income and race/ethnicity				
Jefferson Parish	All (%)	White	Black	Hispanic	Asian	Other (including multiple races)
Less than 30 percent	74	-4	3	8	-8	*
30 to 50 percent	71	-13	11	18	9	*
50 to 80 percent	57	-8	9	13	2	18
80 to 100 percent	36	-4	8	1	14	*
Greater than 100 percent	12	-1	0	8	4	0
St. Charles Parish	All (%)	White	Black	Hispanic	Asian	Other (including multiple races)
Less than 30 percent	78	0	-2	*	*	*
30 to 50 percent	61	-10	12	*	*	*
50 to 80 percent	53	-9	12	*	*	*
80 to 100 percent	29	5	-19	*	*	*
Greater than 100 percent	8	0	1	-4	*	*
Orleans Parish (comparison)	All (%)	White	Black	Hispanic	Asian	Other (including multiple races)
Less than 30 percent	73	-2	1	0	-15	1
30 to 50 percent	81	-1	0	-2	3	2
50 to 80 percent	64	6	-1	4	-48	-5
80 to 100 percent	41	10	-4	-2	-28	*
Greater than 100 percent	17	1	-2	6	-5	3

* Insufficient data
Source: U.S. Census Bureau, 2008-2012 ACS estimates, CHAS tabulation.

Individuals with disabilities may also have greater challenges in addressing housing needs. Ensuring that these individuals do not experience those needs disproportionately is an important element of affirmatively furthering fair housing. In reviewing available data (see Table 12), extremely low income households with individuals with cognitive limitations may experience housing needs at levels greater than households without individuals experiencing limitations in both Jefferson Parish and St. Charles Parish. However, the data does not indicate widespread disparities in housing needs for any single group at any income level. Households in which an individual with a disability is present appear to experience housing needs at rates lower than other households at all but the lowest incomes. Programs or assistance directed towards these households may be effective in supporting basic housing needs.

TABLE 12: DISPROPORTIONATE HOUSING NEEDS BY PRESENCE OF AN INDIVIDUAL WITH A DISABILITY

Household income (as a percent of the area median)	Percent of households experiencing at least one of four housing problems by presence of an individual with a disability				
Jefferson Parish	No limitations	Hearing or vision impairment	Ambulatory limitation	Cognitive limitation	Self-care or independent living limitation
Less than 30 percent	72	78	77	82	78
30 to 50 percent	77	55	58	67	61
50 to 80 percent	61	39	45	54	45
Greater than 80 percent	16	13	17	19	15
St. Charles Parish	No limitations	Hearing or vision impairment	Ambulatory limitation	Cognitive limitation	Self-care or independent living limitation
Less than 30 percent	80	73	81	87	74
30 to 50 percent	69	45	45	63	54
50 to 80 percent	58	24	30	43	32
Greater than 80 percent	10	12	16	19	17
Orleans Parish (comparison)	No limitations	Hearing or vision impairment	Ambulatory limitation	Cognitive limitation	Self-care or independent living limitation
Less than 30 percent	72	77	76	71	76
30 to 50 percent	85	71	72	76	70
50 to 80 percent	68	45	48	51	45
Greater than 80 percent	20	21	21	29	21

Source: U.S. Census Bureau, 2008-2012 ACS estimates, CHAS tabulation.

Some households may experience housing difficulties to a particularly severe degree. These housing problems are labeled as “severe housing problems,” and they are:

- Severe cost burden: monthly housing costs exceed 50 percent of a household's monthly income
- Lacking complete kitchen facilities
- Lacking complete plumbing facilities
- Severe overcrowding: more than 1.5 persons per room

Table 13, like Table 11, shows how each race or ethnicity group experiences housing needs relative to all households in the same income group. Those experiencing disproportionate need are highlighted.

In Jefferson Parish, Hispanic households experience severe housing needs at a disproportionate rate, suggesting that housing needs are particularly widespread in Jefferson Parish's Hispanic communities. Black, Hispanic, and Asian households earning 30 to 50 percent of the area median income experience severe housing problems at rates disproportionate to the overall population. The broad difference at this income level between white and non-white households is stark and suggests a significant fair housing issue. Households identifying as races or ethnicities outside

of the four major groups (or as multiple races) and earning between 50 and 80 percent of the area median income also experience disproportionate severe housing needs.

Limited population sizes in St. Charles Parish precludes most analysis of Hispanic, Asian, and other households by income level. In the data available, there are no major disparities in severe housing need by race or ethnicity among income groups.

By comparison, fewer groups of households experience severe housing needs at a disproportionate rate in Orleans Parish. However, households identifying as “other” or multiple races that earn between 50 and 80 percent of the area median income experience severe housing needs at a rate 17 points higher than all households at that income level. This disparity mirrors Jefferson Parish. Unlike Jefferson and St. Charles Parishes, Orleans Parish's Hispanic households earning between 80 and 100 percent of the area median income experience severe housing needs at a rate 14 points higher than all households at that income level.

TABLE 13: DISPROPORTIONATE SEVERE HOUSING NEEDS

Household income (as a percent of the area median)	**Households with severe housing problems (baseline)**	**Point difference from baseline by income and race/ethnicity**				
Jefferson Parish	All (%)	White	Black	Hispanic	Asian	Other (including multiple races)
Less than 30 percent	64	-5	3	10	-6	*
30 to 50 percent	49	-11	11	12	24	*
50 to 80 percent	18	0	-2	4	4	12
80 to 100 percent	9	-1	1	2	4	*
Greater than 100 percent	3	-1	1	8	7	1
St. Charles Parish	All (%)	White	Black	Hispanic	Asian	Other (including multiple races)
Less than 30 percent	64	8	-9	*	*	*
30 to 50 percent	35	-1	-1	*	*	*
50 to 80 percent	24	-5	3	*	*	*
80 to 100 percent	11	1	-9	*	*	*
Greater than 100 percent	1	0	2	-1	*	*
Orleans Parish (comparison)	All (%)	White	Black	Hispanic	Asian	Other (including multiple races)
Less than 30 percent	65	1	0	5	-15	0
30 to 50 percent	58	5	-1	6	-2	-7
50 to 80 percent	26	8	-4	4	-10	17
80 to 100 percent	12	6	-4	14	-8	-5
Greater than 100 percent	5	0	0	5	1	-2

* Insufficient data

Source: U.S. Census Bureau, 2008-2012 ACS estimates, CHAS tabulation.

Access to Community Assets

Community assets such as public transit, grocers, and quality schools are often an important factor in choosing where to live. When protected classes have disproportionately less access to those assets (or access to lower quality assets), it represents a fair housing issue.

Grocers

The U.S. Department of Agriculture collects and releases data on access to grocers throughout U.S. neighborhoods. Neighborhoods are labeled as Low Access if more than a third of residents live more than one mile from a grocer in an urban setting and more than ten miles in a rural setting. Limited food access may serve as a barrier to the health and cost-effective spending for members of such communities, particularly households with limited incomes.

In Map 8, areas with low food access are visible in yellow. Low Access areas are spread across both urban and rural sections of the Jefferson Parish HOME Consortium Area. However, many of the areas border urbanized core bordering the Mississippi River. In Jefferson Parish, the demographic makeup of residents living in Low Access areas differs moderately from the overall population. The most significant differences are a lower percentage of white residents and a higher percentage of black residents experiencing low food access. In St. Charles, the demographic makeup of Low Access areas nearly mirrors that of the overall population.

Jefferson Parish and St. Charles Parish also have areas considered Low Access and Low Income (visible with red striping in Map 8). These areas are of particular concern, as low income households are less able to find transportation to food sources and in particular need of the low cost, healthy produce that grocers provide.

Black residents of Jefferson Parish (including the City of Kenner) are severely overrepresented in Low Income/Low Access areas. More than 75 percent of the entire population of these neighborhoods identifies as black (see Table 14). Approximately 7 percent of Jefferson Parish's population lives in Low Income/Low Access neighborhoods, but 22 percent of the parish's total black population lives in those neighborhoods.

Similar disparities exist in the Low Income/Low Access neighborhoods of St. Charles Parish. However, the differences are not as severe. Black residents are overrepresented, with more than 57 percent of the total population living in Low Income/Low Access neighborhoods. White residents are moderately underrepresented in Low Income/Low Access neighborhoods.

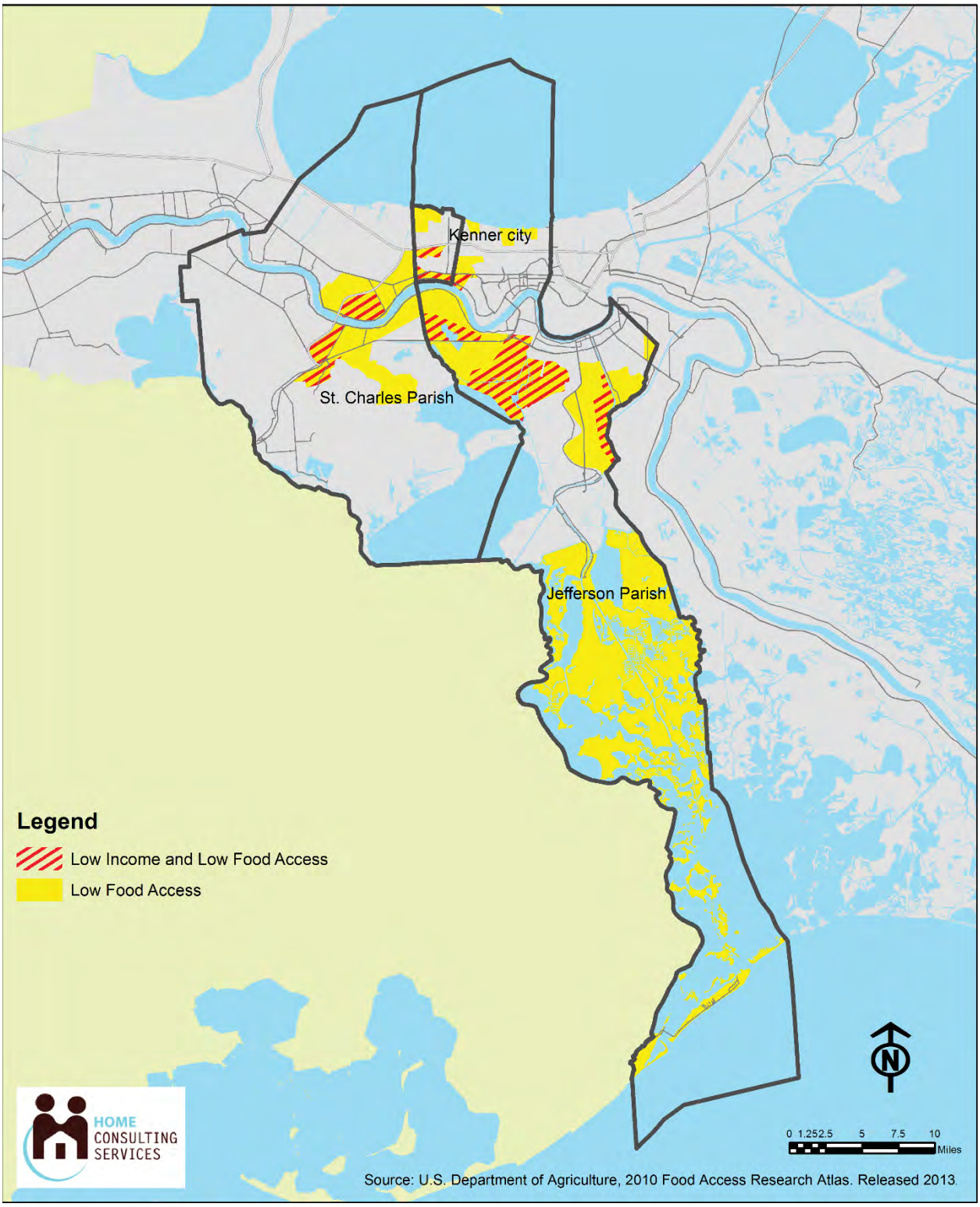
TABLE 14: RACE/ETHNICITY AND LOW FOOD ACCESS AREAS

Neighborhood type	Percent of race/ethnicity in neighborhood type					
Jefferson Parish	White	Black	Hispanic	Asian	American Indian	Other
All	55.5	26.0	12.8	4.0	0.4	1.4
Low Food Access	42.8	41.2	9.2	5.3	0.3	1.2
Low Food Access + Low Income	12.3	78.7	6.6	0.9	0.5	1.0
St. Charles Parish	White	Black	Hispanic	Asian	American Indian	Other
All	66.0	26.2	5.2	0.9	0.1	1.6
Low Food Access	63.2	28.1	6.1	1.2	0.2	1.3
Low Food Access + Low Income	34.0	57.5	6.2	0.0	0.1	2.2

Source: U.S. Department of Agriculture, 2010 Food Access Research Atlas; U.S. Census Bureau, 2009-2013 ACS estimates.

That these disparities affect black residents almost exclusively suggests that neighborhoods with significant black populations are more likely to have limited access to important community assets. This represents a significant fair housing issue.

MAP 8: ACCESS TO GROCERS



School/Educational Assets

Housing and education are inextricably linked. Quality schools have a strong influence on housing values. Therefore, higher performing school districts are often unaffordable for low-to-moderate income households.[14] Moreover, access to a quality education is an essential ingredient to ensure future opportunity. Receiving a quality education increases the ability of an individual to secure adequate employment and stay financially stable enough to generate intergenerational wealth.

A recent study found that children from public housing, living and attending schools in a middle class neighborhood, showed measurable improvement in academic performance over children with similar characteristics living and attending schools in a low income neighborhood.[15] Additionally, the Center for Housing Policy, the research arm of the National Housing Conference, contends that adequate and affordable housing significantly influences a student's educational performance.[16] If higher achievement in school has a positive impact on opportunity, securing affordable housing in high opportunity areas is imperative.

Access to quality schools typically equates to living in stable neighborhoods that benefit from higher-than-average median household income and have high levels of homeownership. Private education aside, the neighborhood in which a family resides largely determines the quality of education their children will receive. Additional educational opportunities such as Advanced Placement courses, after-school programs and a safe school environment depend on the tax base of the residential area. This is directly influenced by concentrations of wealth and poverty in the community.

Though the U.S. Supreme Court's ruling on *Brown v. Board of Education* in 1954 brought about the end of "separate but equal" public schools, the prevalence of the neighborhood school in America's public school system has allowed educational inequities to mirror residential patterns. Residential segregation reinforces school segregation, both of which are the results of and contributing factors to racial inequality.[17] This correlation is particularly noticeable at lower grade levels as school attendance boundaries are smaller and reflect residential demographics. School integration has been shown to produce positive educational and social outcomes. Ample research evidence indicates that test scores, college attendance rates, and employment outcomes improve for students in integrated schools.[18]

The residential demographic patterns significantly contribute to the school demographics of Jefferson Parish schools. The map below shows the percentage of minorities per school. Largely, the schools on the East Bank have a lower minority composition than those schools on the West Bank. There are noticeable concentrations of minority dominant schools in Terrytown, Timberland, and Woodmere. Those schools in Metairie, River Ridge, and Elmwood have the lowest minority percentages.

Though there has been noticeable improvement in the public education outcomes of Jefferson Parish schools over the past several years, there exists a strong spatial correlation between school performance letter grades as provided by the Louisiana Department of Education and the minority makeup of the student body. The vast majority of schools

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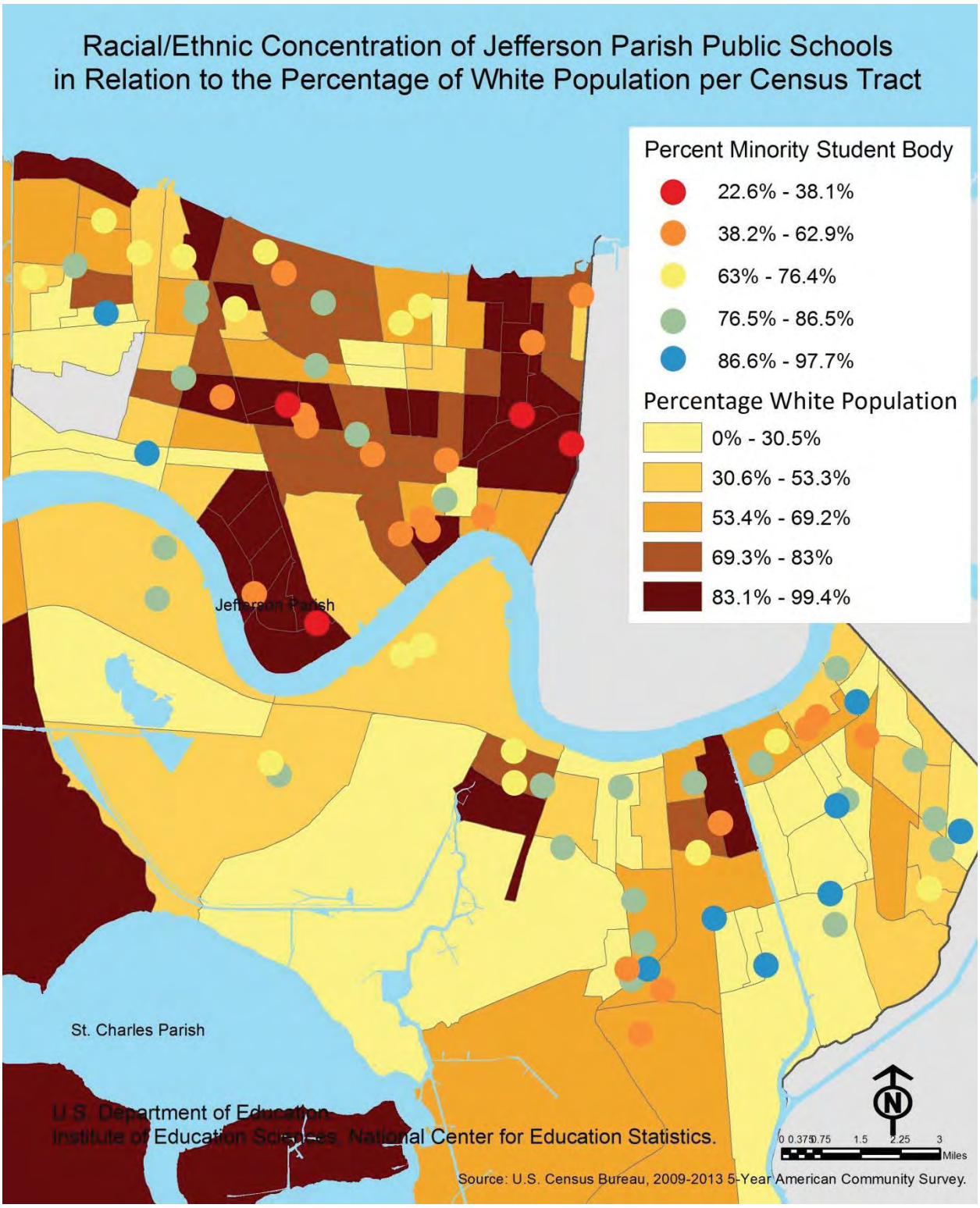
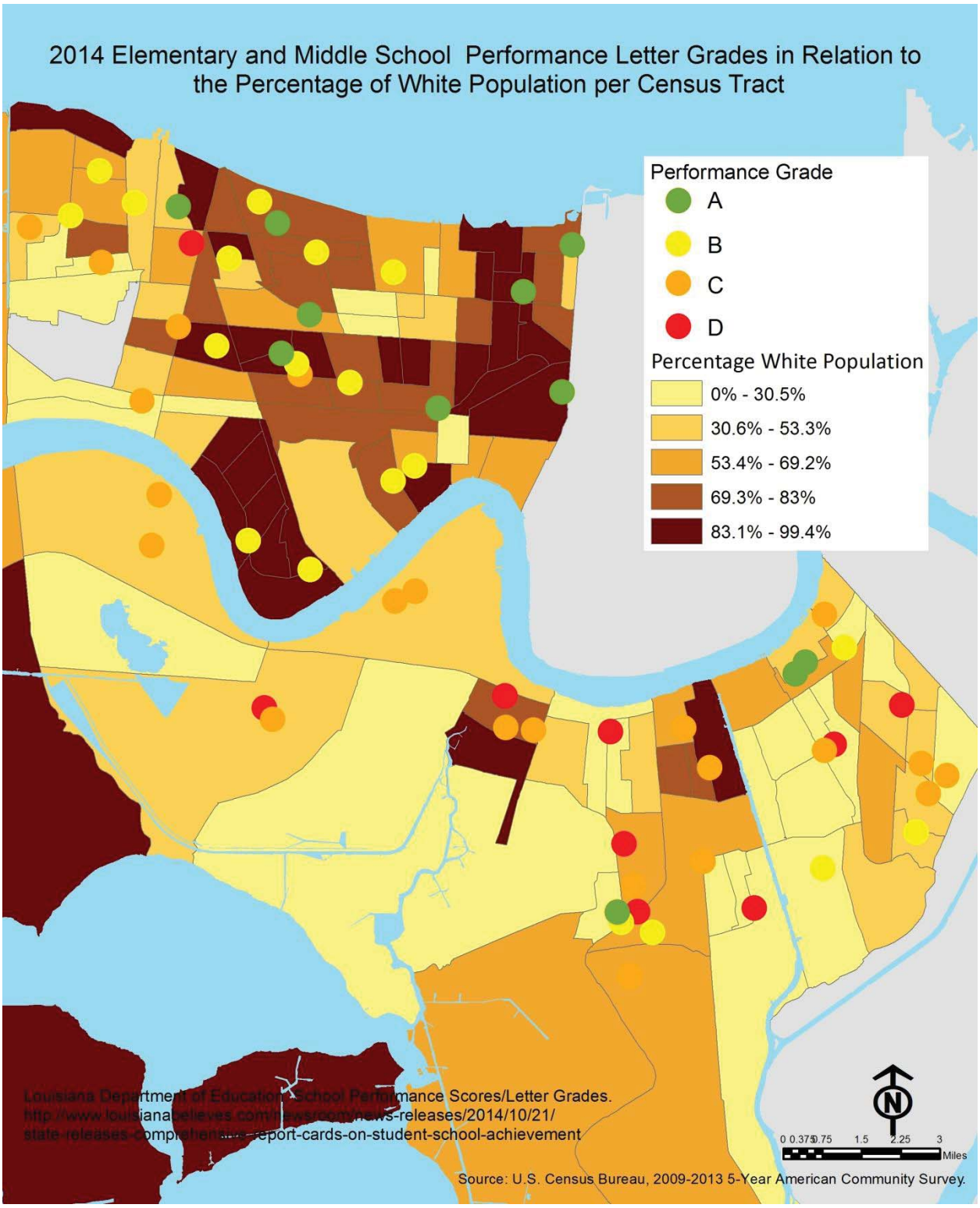
[14] McKoy, Deborah, and Jeffrey Vincent. "Housing and Education: The Inextricable Link." In *Segregation: The Rising Costs for America*, by James Carr and Nandinee Kutty, 125 - 150. New York: Routledge, 2008.
[15] Ibid.
[16] Lubell, Jeffrey, and Maya Brennan. *The Positive Impact of Affordable Housing on Education: A Research Summary.* Research Summary, Washington, D.C.: Enterprise Community Partners & Center for Housing Policy, 2007.
[17] Paul M. Ong and Jordan Rickles, The Continued Nexus between School and Residential Segregation, 6 Afr.-Am. L. & Pol'y Rep. 178 (2004). Available at: http://scholarship.law.berkeley.edu/bjalp/vol6/iss2/4
[18] Ibid.

receiving A and B grades exist on the East Bank while the majority of schools receiving C and D grades are found on the West Bank.

MAP 9: PUBLIC SCHOOL AND NEIGHBORHOOD DEMOGRAPHICS



MAP 10: SCHOOL PERFORMANCE GRADES BY NEIGHBORHOOD COMPOSITION



Private schooling is an option many families take advantage of in underperforming public school systems. Often, the demographics of private schools are vastly different from public schools. The Jefferson Parish public school system

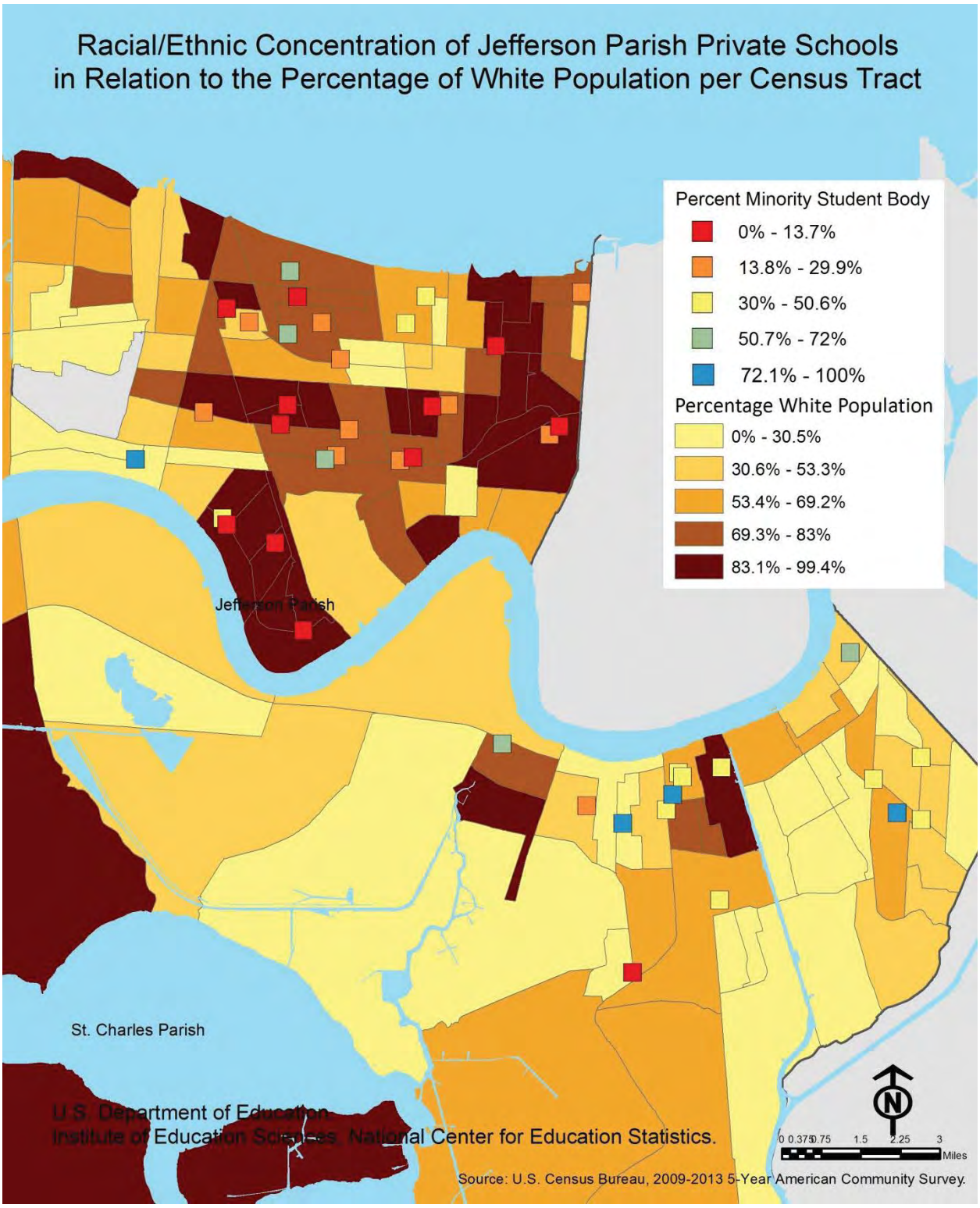
had a student body of 45,322 in the 2012-2013 school year.[19] Private schools, as reported to the National Center for Education, had an enrollment of 13,599 during the 2013-2014 school year.[20] Table 15 above shows the demographic differences between the two types of schools.

Map 10 on page 47 shows the spatial distribution of private schools in relation to the percentage of white residents per census tract. With only one exception, the private schools having the greatest percentage of white students are located on the East Bank in census with the highest concentration of white residents. Just two private schools are located on the West Bank that have minority populations less than 30%.

Promoting school integration and hence equitable educational outcomes is nearly impossible without simultaneously addressing residential segregation. There exists a clear need for unified, comprehensive urban and educational policies to address school segregation within Jefferson Parish. Historically, school busing has been the most common method to desegregate schools. However, many of the school desegregation plans of the Civil Rights era have been eliminated, making the need for new, alternative policies ever more important. The spirit of the Fair Housing Act suggests that the neighborhood in which a child grows up in should have no bearing on its ability to obtain a quality education, arguably the most important tool to achieve success.

[19] U.S. Department of Education, National Center for Education Statistics, Common Core of Data (CCD), "Public Elementary/Secondary Universe Survey" 2012-13 v.1a.
[20] U.S. Department of Education, National Center for Education Statistics, PSS Private School Universe Survey data, 2013-2014.

MAP 11: PRIVATE SCHOOL AND NEIGHBORHOOD DEMOGRAPHICS



Home Mortgage Disclosure Act (HMDA) Analysis

Discrimination in the private mortgage market has been a significant barrier to fair housing for close to 80 years. This discrimination has disparately prevented minorities, most significantly African Americans, from accessing the numerous benefits derived from homeownership. Homeownership is the predominant way in which Americans build wealth and the only way that the vast majority of Americans are able to purchase a home is with a mortgage. The impact that private market discrimination has had on minorities' ability to create intergenerational wealth is significant. A study examining the growing wealth disparity between white and African American families over a 25 year period found the predominant factor to be homeownership.[21] As such, the examination of mortgage lending is an integral component to any assessment of impediments to fair housing choice.

This report uses data collected under the Home Mortgage Disclosure Act (HMDA) to document mortgage lending trends in the Jefferson Parish HOME Consortium Area (Jefferson Parish, St. Charles Parish, and the City of Kenner). Originally enacted by Congress in 1975, HMDA requires numerous financial institutions to maintain, report, and publicly disclose information about mortgages. These publicly available data are important because they help to show whether lenders are serving the housing needs of their communities. They also provide public officials with critical information needed for sound public-sector investment.

In short, three categories of loans are reported under HMDA guidelines: home purchase loans, home improvement loans, and refinance loans. Every loan that falls into one of these categories must be reported. Additionally, the lender is required to report data about:

- The loan type and amount;
- The property location and type;
- The action taken on the loan, such as if the loan was originated or denied;
- The applicant, primarily ethnicity, race, sex, and income.

The loans analyzed in this report are for owner-occupied, 1-4 family residences.

HMDA data is not without shortcomings. For example, it does not contain key applicant characteristics such as credit history, credit score, or debt burden. It also does not include data on the loan to value ratio (the value of the home compared to the amount requested), or expense to income ratio (the monthly expense of the loan compared to borrowers income and existing debt obligations). These variables are certainly important factors in the loan underwriting process and their impact on loans is well documented. However, these variables are not included in the lending test during regulatory CRA reviews. As such, their inclusion typically serves to explain a greater share of disparities in the lending market but, more often than not, fail to fully account for lending disparities, particularly racial and ethnic disparities.

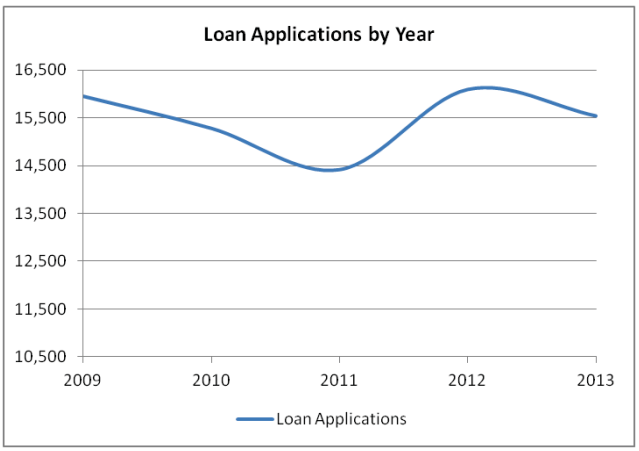
The lending analysis specifically focuses on those loans made within the Jefferson Parish Consortium Area over the five year period from 2009 to 2013.

The Jefferson Parish Consortium Area displayed a remarkably level distribution of loan activity in the years following the Nation-wide collapse of the housing market. Mortgage lending contracted precipitously in communities across the country; few communities exhibited the resilience to the economic downturn that the Jefferson Parish area did. Certainly, there are several obvious reasons for this sustained level of investment, namely the environmental

[21] Thomas Shapiro, Tatjana Meschede, and Sam Osoro, "The Roots of the Widening Racial Wealh Gap: Explaining the Black-White Economic Divide," Research and Policy Brief (Institute on Assets and Social Policy, Brandeis University, February 2013), http://iasp.brandeis.edu/pdfs/Author/shapiro-thomas-m/racialwealthgapbrief.pdf.

incidents, Hurricanes Katrina and Rita, as well as the BP Oil spill. Each of these devastating events was followed by concentrated Federal, State, and Local government investment.

FIGURE 10: MORTGAGE APPLICATIONS, 2009 - 2013



The most common measures of loan outcomes are the origination rate and denial rate. Though often calculated differently, this analysis uses the least complicated calculation: the origination rate is simply the number of loan originations divided by the sum of the number of loan originations and loan denials. The denial rate is the total number of denials divided by the sum of the number of loan originations and denials.

Over the 5 year study period, 42,452 loans were originated by lending institutions and 16,626 were denied for total loan origination rate of 71.9 percent and a denial rate of 28.1 percent. In 2009, 15,958 loan applications were submitted within the area; by 2013, this number had contracted slightly to 15,548. The chart below shows all loans by action taken by year.

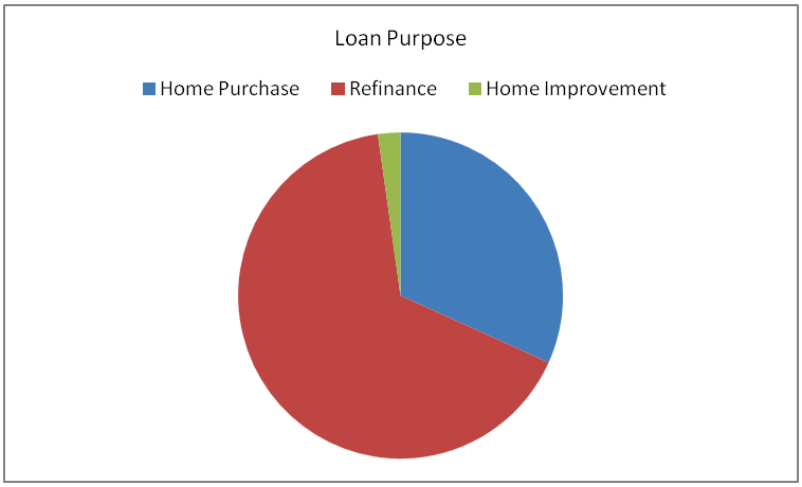
TABLE 16: MORTGAGE APPLICATION SUMMARY BY YEAR, 2009 - 2013

Year	Loan Originated	Application Approved but not accepted	Application Denied	Application Withdrawn	File Closed	Grand Total	Denial	Origination
2009	8,839	857	3,515	2,110	637	15,958	28.5%	71.5%
2010	8,292	720	3,468	2,162	643	15,285	29.5%	70.5%
2011	7,723	804	3,167	2,159	568	14,421	29.1%	70.9%
2012	9,144	764	3,049	2,511	634	16,102	25.0%	75.0%
2013	8,454	878	3,427	2,120	669	15,548	28.8%	71.2%
Total	**42,452**	**4,023**	**16,626**	**11,062**	**3,151**	**77,314**	**28.1%**	**71.9%**

Loan Analysis by Loan Type

Overall, loans for the sole purpose of purchasing a home accounted for 32 percent; refinance loans accounted for 66 percent; and home improvement loans accounted for 2 percent of all loan originations.

FIGURE 11: MORTGAGE ORIGINATIONS BY PURPOSE



HMDA further classifies loans by type; these classifications are Conventional, FHA, VA, and FSA/RHS.[22] Over the five year period, Conventional loans accounted for 29,604 (70 percent) loan originations; FHA loans for 10,547 (25 percent); VA loans for 1,834 (4 percent); and FSA/RHS for 466 (1 percent).

FIGURE 12: MORTGAGE ORIGINATIONS BY LOAN TYPE

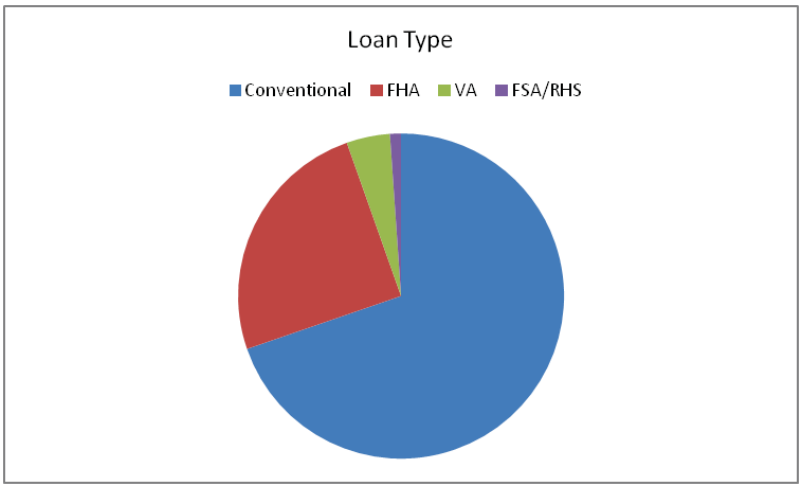


Table 17, Table 18, and Table 19 below show each loan type by individual loan purpose. Conventional loans for the sole purpose of purchasing a home experienced the highest origination rates and lowest denial rates. Conventional refinance loans also experienced the highest origination and lowest denial rates. Conventional home improvement loans exhibited the lowest origination and highest denial rates.

[22] Conventional is defined as any loan other than FHA, VA, FSA, or RHS; FHA-insured (Federal Housing Administration); VA-guaranteed (Veterans Administration); FSA/RHS (Farm Service Agency or Rural Housing Service).

TABLE 17: HOME PURCHASE APPLICATION OUTCOMES BY LOAN TYPE

Home Purchase

	Originated	Denied	Total Loan Applications	Origination Rate	Denial Rate
Conventional	6,259	1,183	9,379	84.1%	15.9%
FHA	5,949	1,273	8,634	82.4%	17.6%
VA	820	164	1,147	83.3%	16.7%
FSA/RHS	455	99	693	82.1%	17.9%
	13,483	**2,719**	**19,853**	**83.2%**	**16.8%**

TABLE 18: REFINANCE APPLICATION OUTCOMES BY LOAN TYPE

Refinance

	Originated	Denied	Total Loan Applications	Origination Rate	Denial Rate
Conventional	22,471	9,382	41,329	70.5%	29.5%
FHA	4,530	3,162	11,747	58.9%	41.1%
VA	1,008	470	2,039	68.2%	31.8%
FSA/RHS	11	6	30	64.7%	35.3%
	28,020	**13,020**	**55,145**	**68.3%**	**31.7%**

TABLE 19: HOME IMPROVEMENT APPLICATION OUTCOMES BY LOAN TYPE

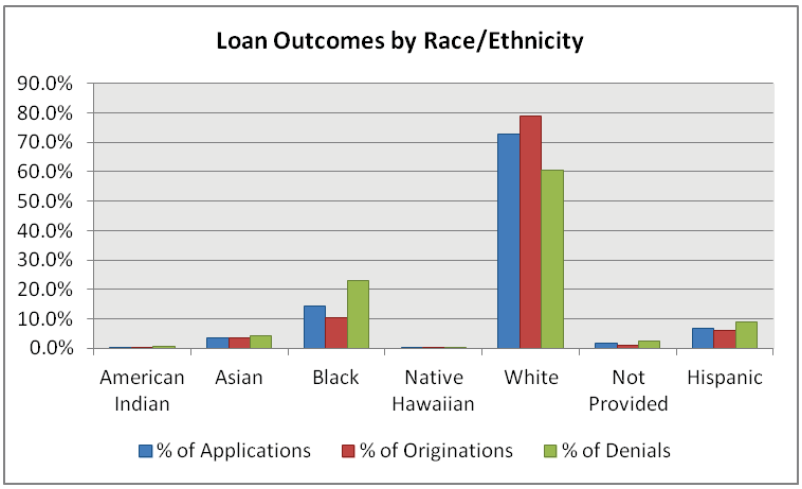
Home Improvement

	Originated	Denied	Total Loan Applications	Origination Rate	Denial Rate
Conventional	874	846	2,137	50.8%	49.2%
FHA	68	36	163	65.4%	34.6%
VA	7	5		58.3%	41.7%
FSA/RHS					
	949	**887**	**2,300**	**51.7%**	**48.3%**

Loan Analysis by Race/Ethnicity

HMDA data includes information on the race and/or ethnicity of loan applicants. Figure 13 below shows the percentage of each racial or ethnic group's share of loan application, originations, and denials from 2009 to 2013. Asian applicants accounted for 3.7 percent; African American applicants, 14.2 percent; White applicants 73 percent; and Hispanic applicants, 6.8 percent of total loan applications. White borrowers were the only racial/ethnic group to experience a larger share of loan originations than loan applications, accounting for 73 percent of loan applications, 78.8 percent of loan originations, and just 60.6 percent of loan denials. Conversely, African American borrowers accounted for 14.2 percent of loan applications but 10.5 percent of loan originations and 23 percent of all loan denials.

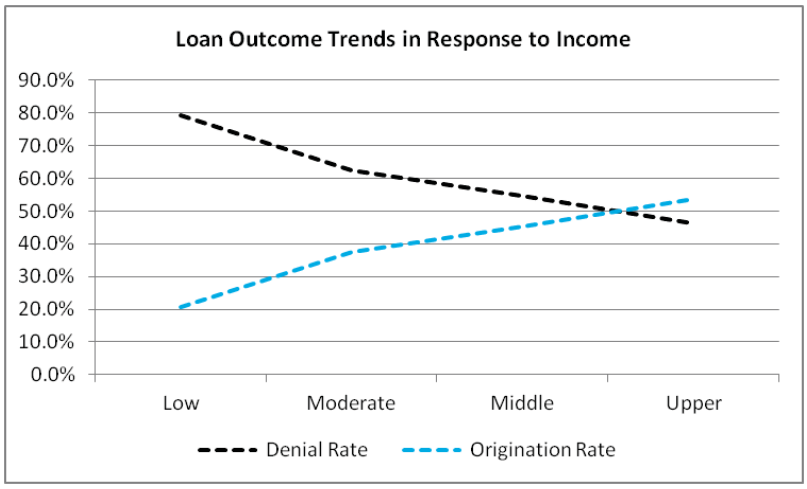
FIGURE 13: LOAN OUTCOMES BY RACE/ETHNICITY



Loan Analysis by Income

HMDA collects data on the income of the loan applicant and classifies each loan as Low, Moderate, Middle, and Upper.[23,24] National lending patterns suggest that as borrower income increases the likelihood of being approved for a loan increases and the likelihood of being denied decreases. This trend certainly holds true for lending within the Jefferson Parish HOME Consortium Area. Figure 14 below shows the positive relationship between loan outcomes and applicant income. For all loans, low income borrowers experienced a denial rate of 79.4 percent and an origination rate of 20.6%; upper income applicants experienced a 46.3 percent denial rate and 53.7 percent origination rate.

FIGURE 14: LOAN OUTCOMES BY INCOME CATEGORY



Though borrower income is not the sole determinant influencing loan outcomes, it is nevertheless a significant influence. Table 20, Table 21, and Table 22 below show the loan outcomes of home purchase, refinance and home

[23] **Low** is less than 50 percent of median family income; **Moderate** is between 50 percent and 80 percent; **Middle** is between 80 percent and 120 percent, and **Upper** is greater than 120 percent. In 2013 the median family income for the New Orleans-Metaire-Kenner MSA was $60,300. Thus, applicants whose income was less than $30,150 were classified as "low"; between $30,150 and $51,255 as "moderate"; between $51,255 and $72,360 as "middle"; greater than $72,360 as "upper."

[24] Federal Financial Institutions Examination Council. FFIEC Census and FFIEC Estimated MSA/MD Median Family Income for 2013 CRA/HMDA Reports.

improvement loans by income cohorts. Regardless of loan purpose, denial rates decreased and origination rates increased as applicant income increased.

Low income applicants experienced a 69.9 percent denial rate compared to a 30 percent denial rate for upper income applicants. Further, low income borrowers submitted just 6.5 percent of the total number of home purchase loan applications; moderate income, 21.5 percent; middle income, 26.7 percent; upper income borrowers accounted for 42.4 percent of all loan applications. Low income borrowers accounted for just 3.4 percent of home purchase loan originations; moderate income, 19.7 percent; middle income, 28.6 percent; and upper income borrowers nearly half of all borrowers at 47.2 percent.

TABLE 20: HOME PURCHASE APPLICATION OUTCOMES BY INCOME CATEGORY

All Home Purchase Loans

	Originated	Denied	Total Loan Applications	Denial Rate	Origination Rate
Low	459	1,065	2,281	69.9%	30.1%
Moderate	2,655	2,118	7,601	44.4%	55.6%
Middle	3,856	2,043	9,434	34.6%	65.4%
Upper	6,370	2,727	14,969	30.0%	70.0%
NA	143	204	994	58.8%	41.2%
	13,483	**8,157**	**35,279**	**37.7%**	**62.3%**

Of concern is the high denial rate experienced by low and moderate income residents applying for refinance loans. Households able to refinance over the past several years have greatly benefitted from record low interest rates. Low and moderate income applicants were denied refinance loans 80.8 and 69.7 percent of the time respectively. As with home purchase loans, low income applicants accounted for 6.5 percent of the total number of refinance loans but just 3.4 percent of loan originations. Conversely, upper income applicants accounted for 47.5 percent of loan applications but 55.7 percent of the total number of refinance loan originations.

TABLE 21: REFINANCE APPLICATION OUTCOMES BY INCOME CATEGORY

All Refinance Loans

	Originated	Denied	Total Loan Applications	Denial Rate	Origination Rate
Low	940	3,954	7,809	80.8%	19.2%
Moderate	2,997	6,885	16,994	69.7%	30.3%
Middle	5,569	9,015	26,101	61.8%	38.2%
Upper	15,614	15,882	56,897	50.4%	49.6%
NA	2,900	3,324	11,999	53.4%	46.6%
	28,020	**39,060**	**119,800**	**58.2%**	**41.8%**

Home improvement loan activity pales in comparison to both home purchase and refinance loan activity with just 5,300 loan applications. Generally, denial rates were higher for home improvement loans than for home purchase and refinance loans. Low income borrowers experienced a denial rate of 91.3 percent, the highest denial rate of any income cohort for any type of loan. Another notable characteristic of the home improvement loan market was the relatively even distribution of loan application among income groups compared to other loan types. Low income borrowers accounted for 14.5 percent of total home improvement loan applications while upper income borrowers accounted for 38.4 percent. However, originations to low income borrowers comprised just 6.1 percent of the total number of loan originations compared to 48.3 percent for upper income applicants.

TABLE 22: HOME IMPROVEMENT APPLICATION OUTCOMES BY INCOME CATEGORY

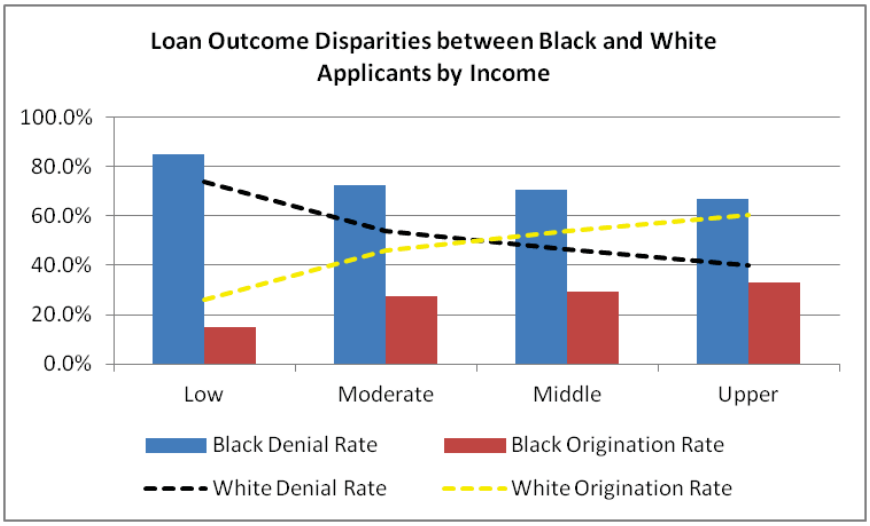
All Home Improvement Loans

	Originated	Denied	Total Loan Applications	Denial Rate	Origination Rate
Low	58	606	768	91.3%	8.7%
Moderate	168	654	1,126	79.6%	20.4%
Middle	233	609	1,234	72.3%	27.7%
Upper	458	735	2,036	61.6%	38.4%
NA	32	57	136	64.0%	36.0%
	949	**2,661**	**5,300**	**73.7%**	**26.3%**

Loan Analysis by Race/Ethnicity and Applicant Income

Examining the race/ethnicity and the income of loan applicants reveals startling disparities in loan outcomes. In aggregate, for all loans, the disparity between white and black borrowers increased as borrower income rose. Low income white borrowers were denied 74.0 percent of the time compared to 85.2 percent of the time for black borrowers, an 11.3 percentage point difference. This difference increased to 27.1 percentage points for upper income borrowers; upper income white borrowers were denied loans 39.8 percent of the time compared to 66.9 percent of the time for black borrowers.

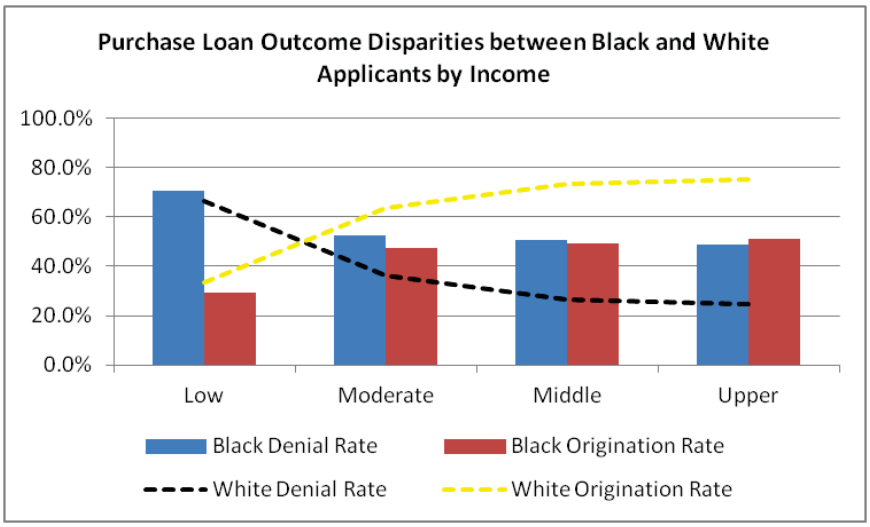
FIGURE 15: MORTGAGE APPLICATION OUTCOME DISPARITIES BY RACE AND INCOME



This trend was consistent among the other two largest minority groups; the disparity between origination rates between white and Asian, and white and Hispanic borrowers increased as income rose.

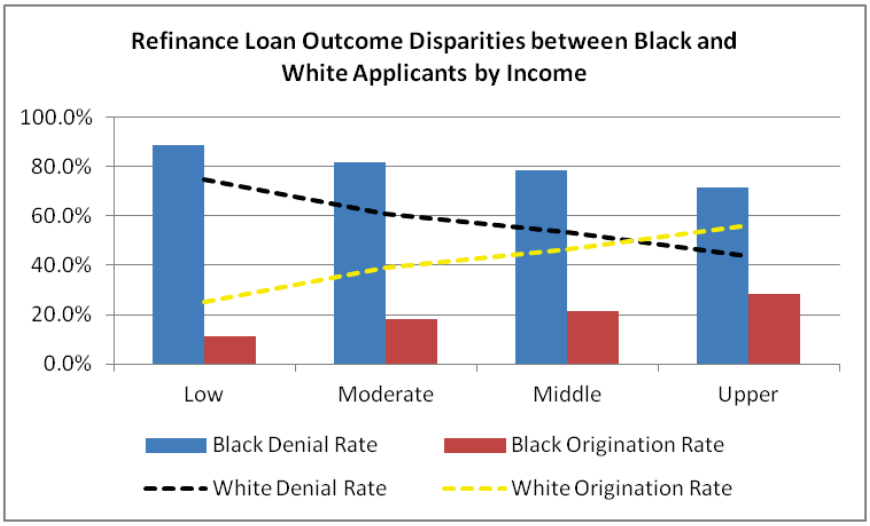
For home purchase loans, the origination rate disparity between low income white and black borrowers was relatively small at 4.3 percentage points. However, this disparity increased dramatically as borrower income rose; upper income white applicants experienced a 75.4 origination rate, their black counterparts experienced a 51 percent origination rate, 24.4 percentage points lower than white applicants.

FIGURE 16: PURCHASE APPLICATION OUTCOME DISPARITIES BY RACE AND INCOME



Refinance loan outcomes between black and white borrowers exhibited the highest origination rate disparities of all loans and racial/ethnic groups. Low income white borrowers experienced an origination rate of 25.2 percent compared to 11.1 percent for low income black borrowers. This disparity increased to 27.6 percent for upper income borrowers; upper income white applicants experienced a 56.2 percent origination rate compared to just 28.5 for upper income black borrowers.

FIGURE 17: REFINANCE APPLICATION OUTCOME DISPARITIES BY RACE AND INCOME



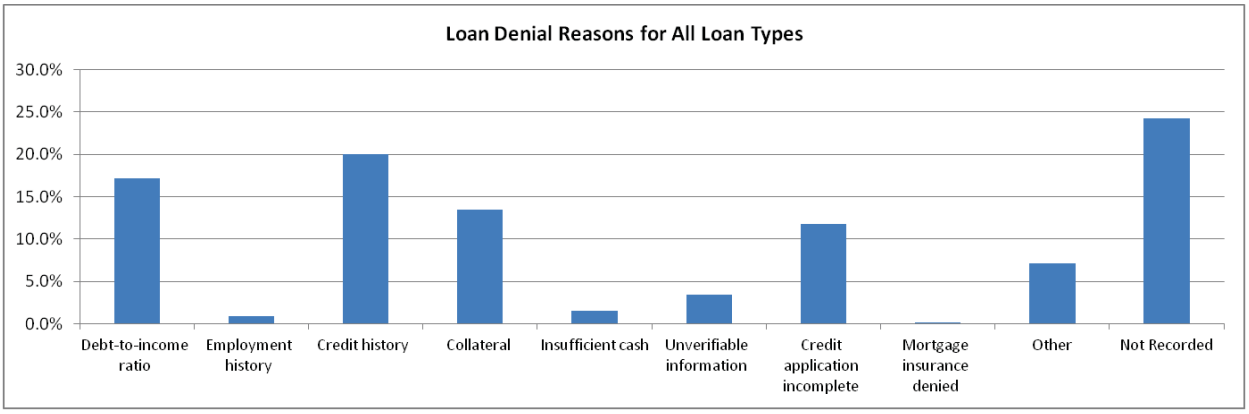
Analysis of Loan Denials

HMDA collects information about the reason a loan is denied. The reason may be categorized as follows:

1. Debt-to-Income Ratio
2. Employment History
3. Credit History
4. Collateral
5. Insufficient Cash such as down payment or closing costs
6. Unverifiable Information
7. Incomplete Credit Application
8. Denial of Mortgage Insurance
9. Other

Between 2009 and 2013, 16,626 loans were denied within the Jefferson Parish HOME Consortium Area. Figure 18 below shows the rate at which each loan denial type was the predominant reason for denial.

FIGURE 18: DENIALS BY TYPE (PERCENT OF ALL DENIALS)



In aggregate, there were four predominant reasons that loans were denied; credit history was the most prevalent cause of denial, accounting for 20.1 percent of loan denials; debt-to-income ratio accounted for 17.1 percent of loan denials; collateral accounted for 13.5 percent; and, incomplete credit applications accounted for 11.8 percent. Just under 25 percent of denied loans were denied for unspecified reasons.

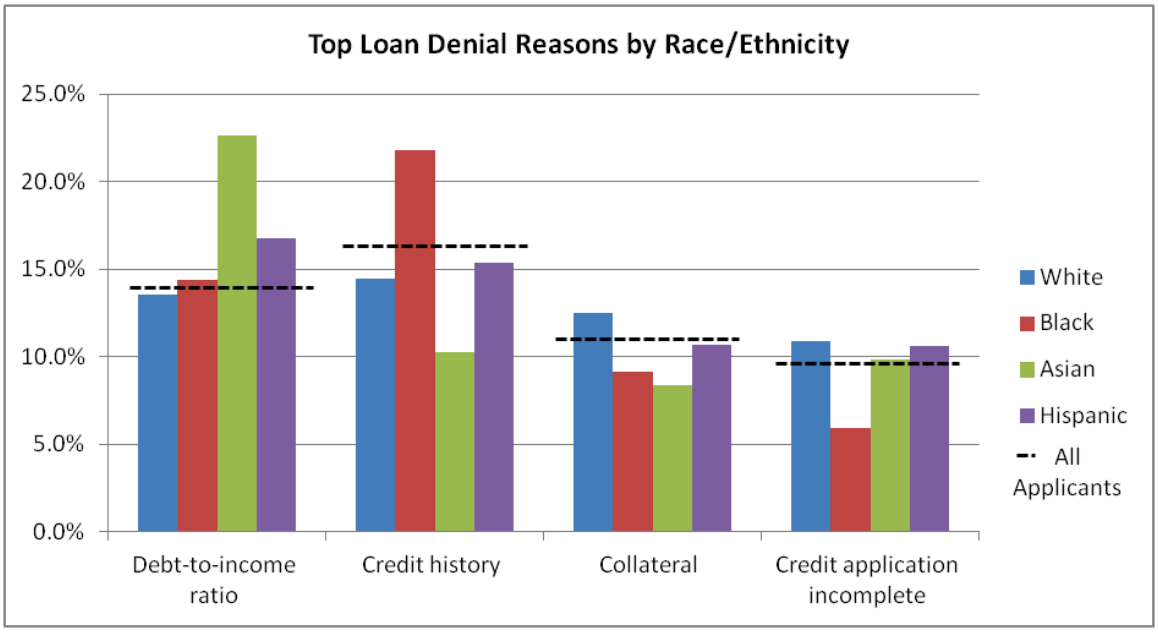
Applicants of varying income experienced slightly different reasons for loan denial as shown in Table 23 below. Debt-to-income was the predominant factor for Low and Moderate income applicants; Credit history was the largest factor for Middle income applicants; Credit history and Collateral were the largest factors for Upper income borrowers. Employment history, insufficient cash, and the denial of mortgage insurance were all very insignificant reasons for loan denial among all income groups.

TABLE 23: DENIALS BY TYPE BY INCOME CATEGORY

Denial Reason as Percentage of All Denials by Income Group				
Denial Reason	Low	Moderate	Middle	Upper
Debt-to-income ratio	32.7%	24.1%	18.8%	10.3%
Employment history	1.0%	1.4%	1.0%	0.7%
Credit history	19.4%	19.7%	20.8%	19.3%
Collateral	5.2%	8.9%	12.6%	19.4%
Insufficient cash	1.3%	1.2%	1.6%	1.6%
Unverifiable information	1.9%	2.9%	3.3%	3.9%
Credit application incomplete	5.9%	7.8%	10.4%	15.2%
Mortgage insurance denied	0.0%	0.1%	0.1%	0.3%
Other	3.5%	6.1%	6.0%	8.4%
Not Recorded	29.1%	27.8%	25.5%	21.2%

Figure 19 below examines the top four predominant loan denial reasons by the race/ethnicity of the loan applicant. Debt-to-income was a more significant issue for Asian and Hispanic applicants. Credit history was a more significant factor for black borrowers than for all other applicants. White borrowers were denied more often than all other borrowers based on collateral and incomplete credit applications, largely due to the significant number of upper income borrowers being denied.

FIGURE 19: TOP DENIAL REASONS BY RACE/ETHNICITY



Spatial Analysis of Loan Outcomes

Map 12 below shows the spatial distribution of purchase loan originations in relation to the percentage of minority population in each census tract.

MAP 12: PURCHASE LOAN ORIGINATIONS BY NEIGHBORHOOD COMPOSITION

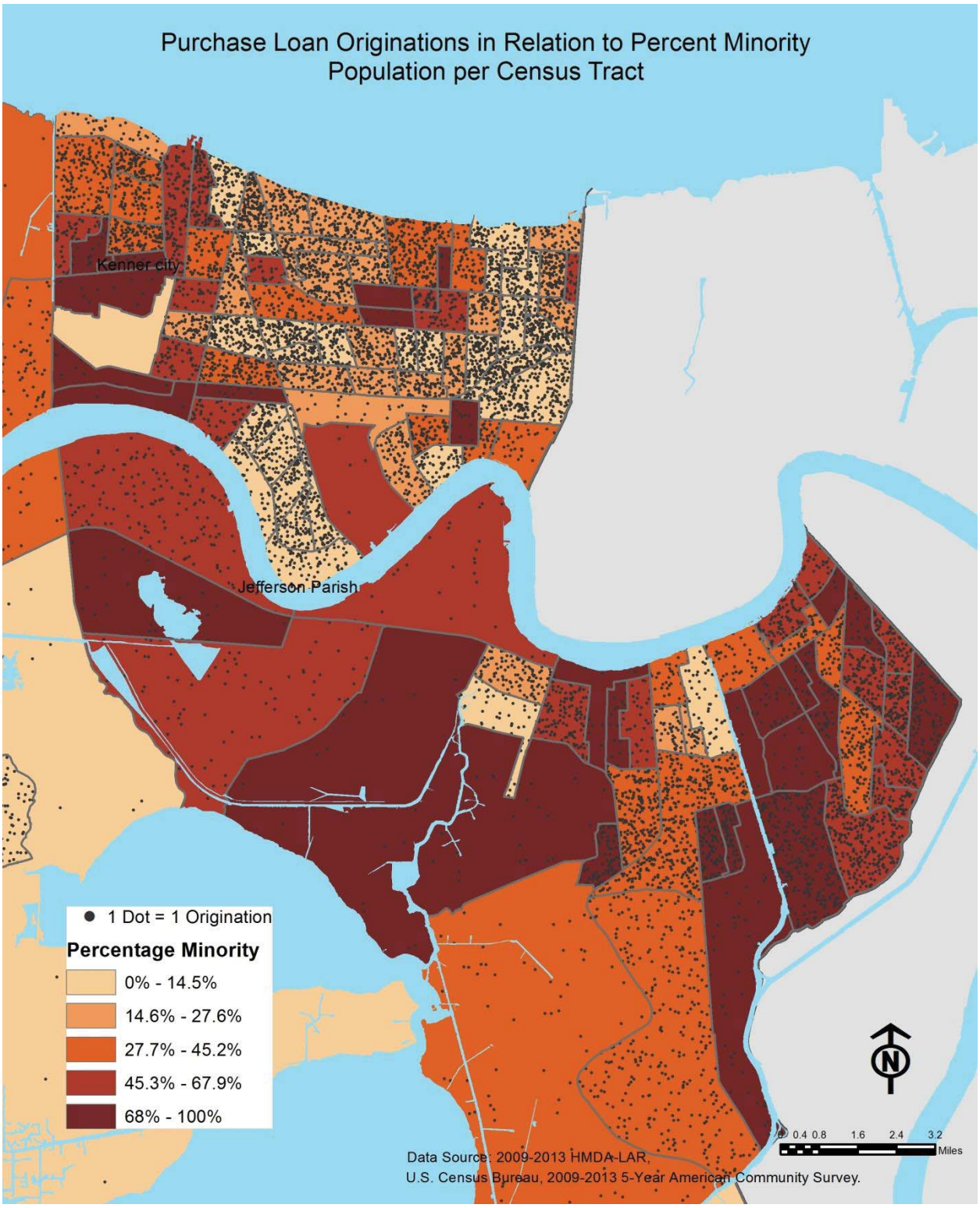


Table 24 below shows the number of loan originations, denials, and the origination and denial rates of census tracts with very high and very low minority populations. Though it is difficult to observe a spatial correlation, the chart clearly shows there is a disparity in the rate at which purchase loans are made in relation to the minority composition of a census tract.

TABLE 24: PURCHASE LOAN ORIGINATION AND DENIAL RATES IN WHITE AND NON-WHITE NEIGHBORHOODS

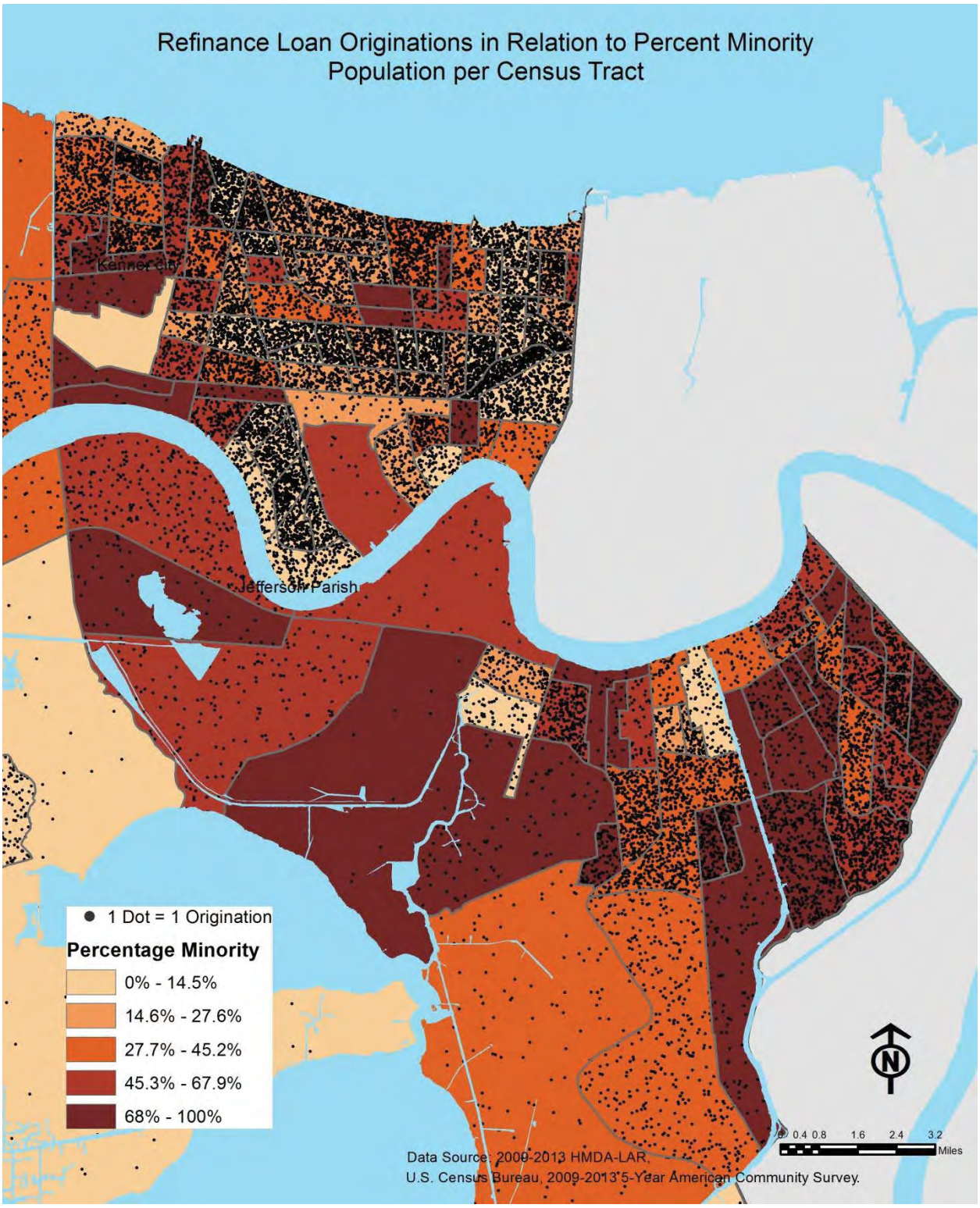
Purchase Loans				
Percentage Tract Minority	Origination	Denial	Origination Rate	Denial Rate
Lowest 10% Minority Tracts	1499	606	71.3%	28.7%
Highest 10 % Minority Tracts	344	444	47.8%	52.2%

Map 13 on page 62 shows the spatial distribution of refinance loan originations in relation to the percentage of minority population in each census tract. Again, a spatial correlation is difficult to observe yet a simple analysis, provided in Table 25 below, of the top and bottom 10 percent of minority census tracts exhibits widely disparate outcomes for loan applicants.

TABLE 25: REFINANCE LOAN ORIGINATION AND DENIAL RATES IN WHITE AND NON-WHITE NEIGHBORHOODS

Refinance Loans				
Percentage Tract Minority	Origination	Denial	Origination Rate	Denial Rate
Lowest 10% Minority Tracts	3451	3060	45.7%	54.3%
Highest 10 % Minority Tracts	715	3183	16.2%	83.8%

MAP 13: REFINANCE LOAN ORIGINATIONS BY NEIGHBORHOOD COMPOSITION



HMDA Summary

HMDA data analysis is an integral component to any comprehensive analysis of impediments in the private housing market. Though this analysis cannot provide conclusive evidence of individual acts of discrimination, the data does provide evidence to suggest disparities in the ability of minorities to purchase a home, refinance existing debt, or make needed home improvements. Below are several actions local governments can take to ensure that residents have the financial capacity and knowledge to access credit.

Down Payment Assistance

Strong evidence suggests that down-payment assistance is an effective mechanism to increase homeownership for low income households. The U.S. Census Bureau's Survey of Income and Program Participation provides insight into the potential of down-payment subsidies to increase the share of renters who could afford to purchase a home. The most recent survey revealed that a lack of savings for a down-payment was the only barrier for 26 percent of renters to purchasing a home. In 2004 dollars, a $5,000 down-payment subsidy was shown to raise the percentage of renters able to purchase a home by 10 percentage points.

Individual Wealth Building and Preservation

These programs aim at increasing individual wealth through Individual Development Accounts, which match the savings deposited by low and moderate income households. They encourage asset building and can be paired with financial education. Individual wealth preservation includes programs aimed at preserving assets, in particular households that are facing foreclosure.

Homeownership and Financial Education and Credit Counseling

Ensuring that citizens have the knowledge to obtain and maintain housing is central to any efforts to increase access to credit. Education and counseling have long been a successful part of strategies to increase the ability of lower income and minority citizens to achieve homeownership. Credit counseling is of particular importance in light of the foreclosure crisis several years ago. Jefferson Community Action Program (JEFFCAP) is a HUD certified counseling agency and offers educational and credit opportunities to area residents. Continuing with this strategy will ensure that those residents qualified to purchase a home are able to do so.

Inclusionary Zoning

Inclusionary zoning is an effective structural solution to a structural problem. In short, inclusionary zoning requires developers to include affordable homes when they build a particular number of market-rate homes. One of the benefits of inclusionary zoning is that market rate housing is often built in relatively desirable neighborhoods; including affordable units in developments in these neighborhoods ensures that lower income residents are not isolated in high poverty neighborhoods far from community resources.

Housing Affordability

Household income serves as a constraint on the housing options available to individuals and families in all housing markets. Households at the upper end of the income spectrum are likely to be able to afford the vast majority of housing options. Households at the lower end of the income spectrum can afford only a fraction of an area's housing units.

The impacts of income constraints may be more severe in places where the mix of housing options do not match the needs of area households, the spatial distribution of housing across a region is segregated by affordability, or transportation costs are high. Housing costs can serve as an impediment to fair housing choice when income constraints most prevalent in certain groups force those households into certain neighborhoods or unaffordable housing. As noted in Table 2 (page 22), several protected classes – including black, Hispanic, and single-female headed households – earn lower incomes than the overall population both regionally and within individual communities.

HUD releases specially tabulated Census data related to housing affordability on an annual basis or as it becomes available. The most recent Comprehensive Housing Affordability Strategy (CHAS) data utilizes American Community Survey 2008-2012 5-year estimates. This analysis makes use of this data.

The figures in this section compare the number of households whose incomes fall into different ranges to the number of occupied housing units with complete kitchen and plumbing facilities whose values or rents would be affordable within each income range.

Rental Affordability

Rental housing is often the most affordable option for households at lower income levels. Jefferson Parish is home to more than 62,000 renter-occupied households, or roughly 38 percent of all households in the parish. Of these renter-occupied households, 12,315 (20 percent) qualify as extremely low income (earning 30 percent of the HUD Area Median Family Income – HAMFI – or less). [The HAMFI is a measure of median income for an area that is adjusted for family size and inflation. It is utilized to determine fair market rents and income limits for housing program participants.] Only 2,900 renter-occupied units are affordable to households at this income level, leaving a gap of 9,415 housing units. A similar gap exists for households earning between 31 and 50 percent of the HAMFI. There are 6,600 more renter-occupied households at this income level than there are affordable housing units.

The housing gap is reversed at incomes between 51 and 80 percent and over 80 percent of the HAMFI. At the 51 to 80 percent HAMFI level, there are 13,500 more units than households. At the highest income level measured (above 80 percent HAMFI), the gap narrows significantly, with 1,800 more units than households.

The same pattern exists in St. Charles Parish as well as Orleans Parish (for the sake of comparison), with significant gaps between the number of renter-occupied households at the lowest incomes and the number of renter-occupied housing units affordable at those income levels. This suggests that although housing exists at all levels of affordability, far too few units exist to meet the needs of low income households. These households are forced to rent units well outside of their level of affordability.

A significant proportion of renter-occupied units in Jefferson Parish are affordable at the 51 to 80 percent HAMFI level. However, only half as many households fall into that income range.

These patterns suggest that barriers exist to building and/or providing rental housing affordable to households with incomes at or below 50 percent HAMFI.

FIGURE 20: JEFFERSON PARISH RENTER HOUSEHOLDS BY INCOME AND RENTAL UNITS BY AFFORDABILITY

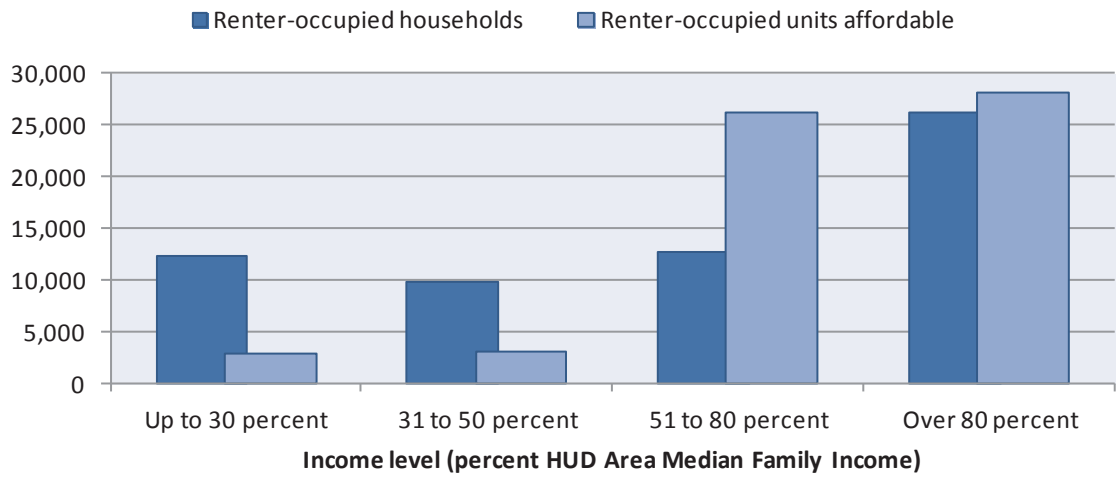


FIGURE 21: ST. CHARLES PARISH RENTER HOUSEHOLDS BY INCOME AND RENTAL UNITS BY AFFORDABILITY

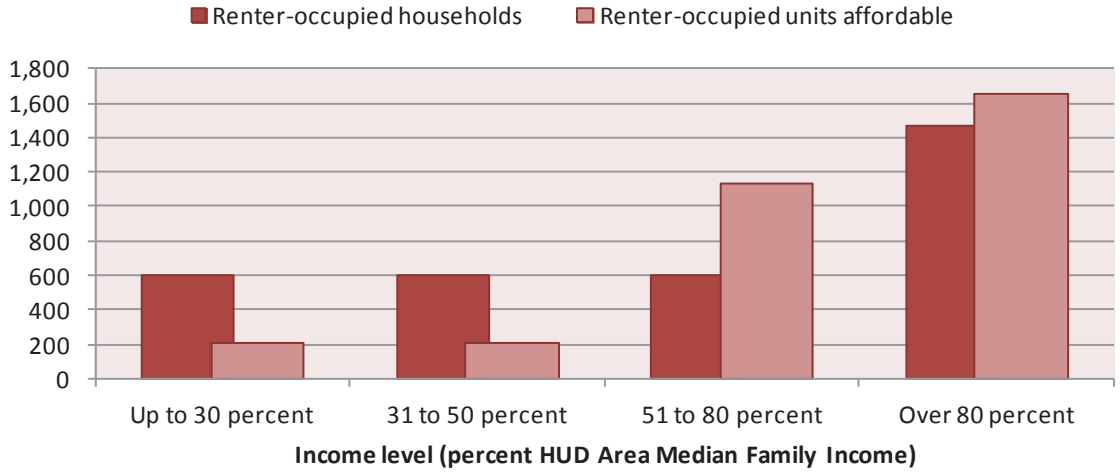
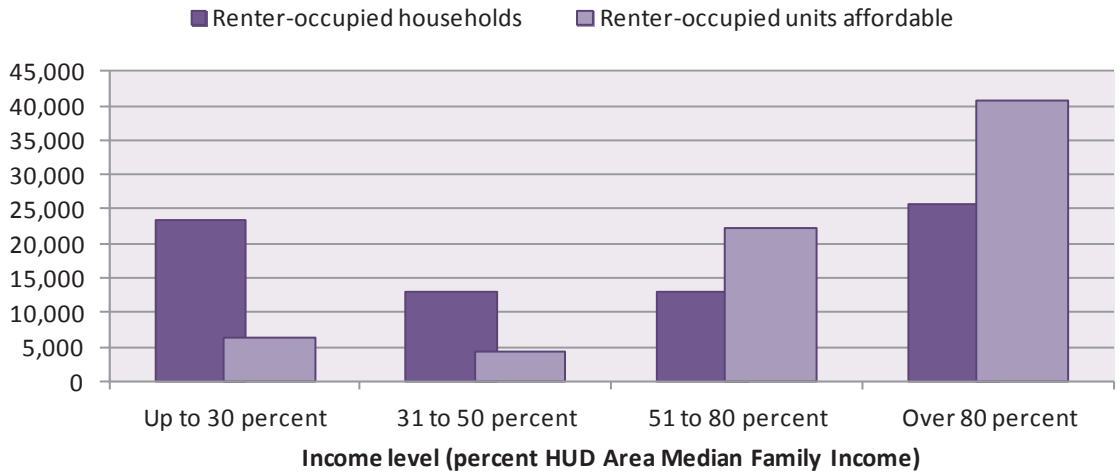
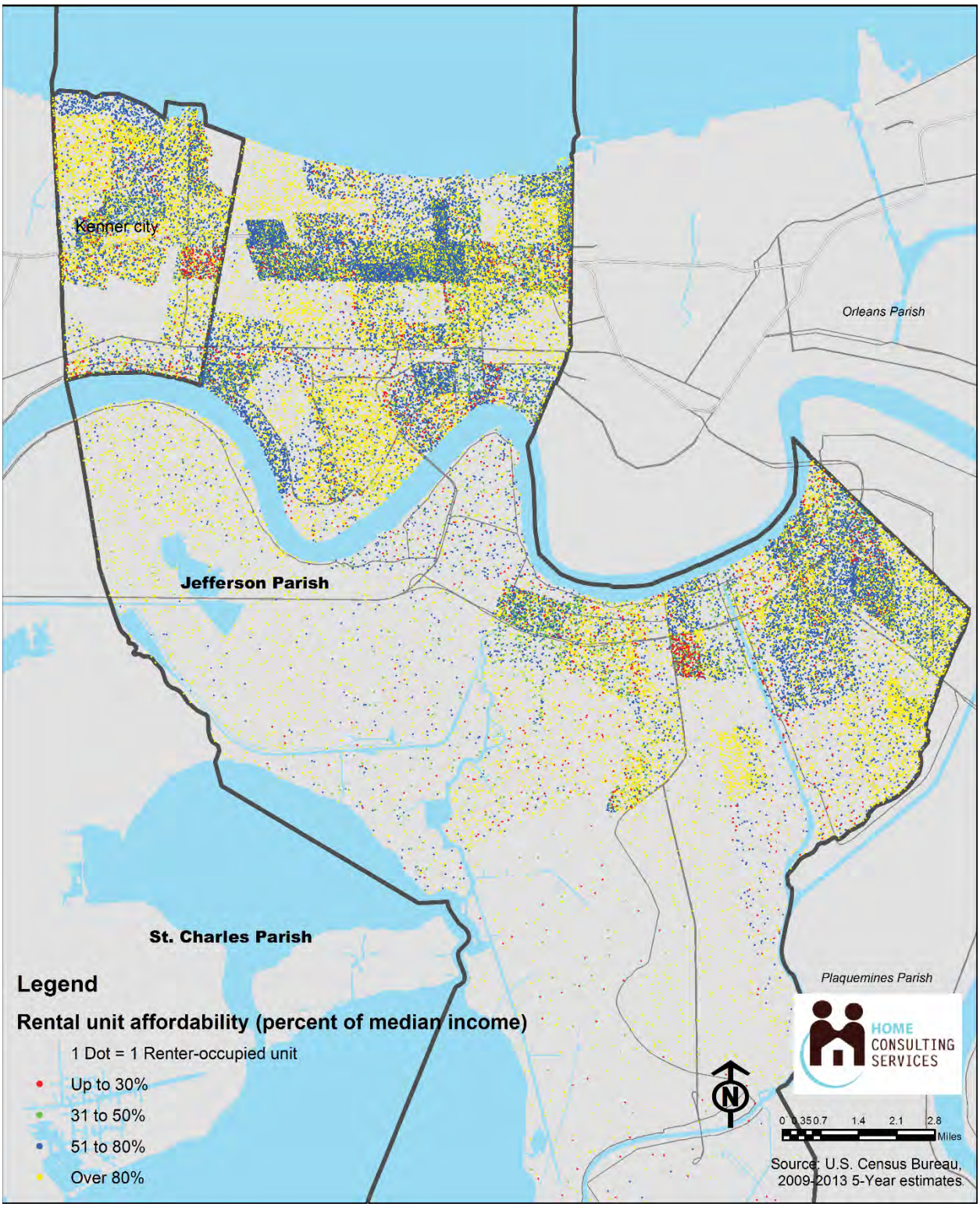


FIGURE 22: ORLEANS PARISH RENTER HOUSEHOLDS BY INCOME AND RENTAL UNITS BY AFFORDABILITY



MAP 14: RENTAL UNIT AFFORDABILITY BY NEIGHBORHOOD



Ownership Affordability

Home ownership is often less affordable than renting. In some circumstances, such as tight rental markets, home ownership may become more affordable on a monthly basis than renting. However, credit and down payment requirements can limit this option to households with incomes closer to the area median.

Most households in both Jefferson Parish (62 percent) and St. Charles Parish (81 percent) are owner-occupied. These patterns are in keeping with suburban communities. The majority of households in the largely urban Orleans Parish are rental-occupied (53 percent).

The supply of owner-occupied housing units is heavily weighted towards households earning above the area median income. In Jefferson and St. Charles parishes, 90 percent of owner-occupied units are affordable only to households earning more than 100 percent HAMFI. In Orleans Parish, 86 percent of owner-occupied units are affordable only to above median income households.

The data suggests that the supply of housing affordable at that level more than meets the number of households meeting those income characteristics. In Jefferson Parish, there are 29,215 more housing units than there are households earning greater than 100 percent HAMFI. The unit/household gap is greater than the total number of owner-occupied units affordable to all incomes at or below 100 percent HAMFI (10,885) by a significant margin.

Data suggests a similar mix of affordability in both St. Charles and Orleans parishes. These patterns may reflect the significant expense of building homes in flood-prone areas. However, the homes do not completely meet the needs of the population at large, and traditionally underserved populations in particular. The significant lack of owner-occupied housing affordable to households earning less than the area median income presents an impediment to populations whose incomes are disproportionately low.

FIGURE 23: JEFFERSON PARISH OWNER HOUSEHOLDS BY INCOME AND OWNER UNITS BY AFFORDABILITY

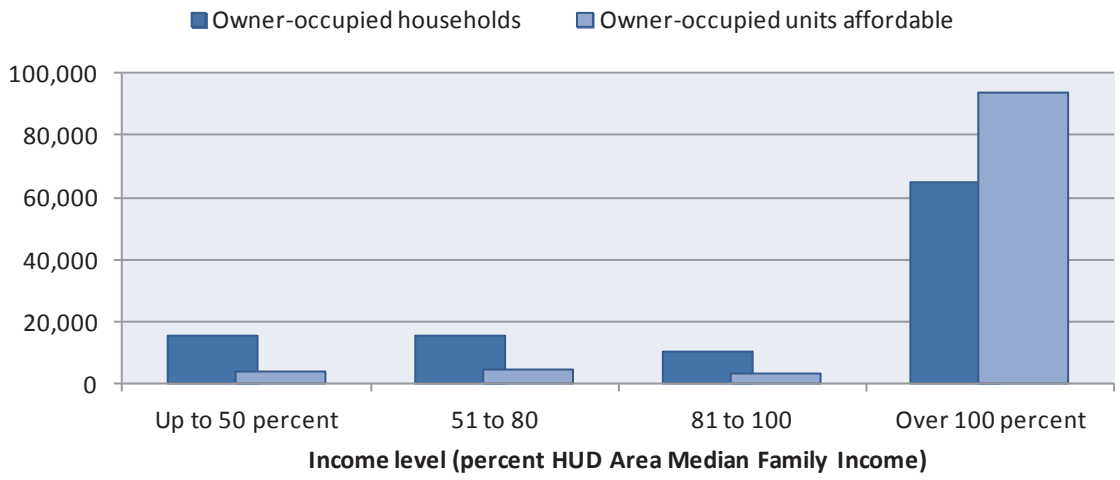


FIGURE 24: ST. CHARLES PARISH OWNER HOUSEHOLDS BY INCOME AND OWNER UNITS BY AFFORDABILITY

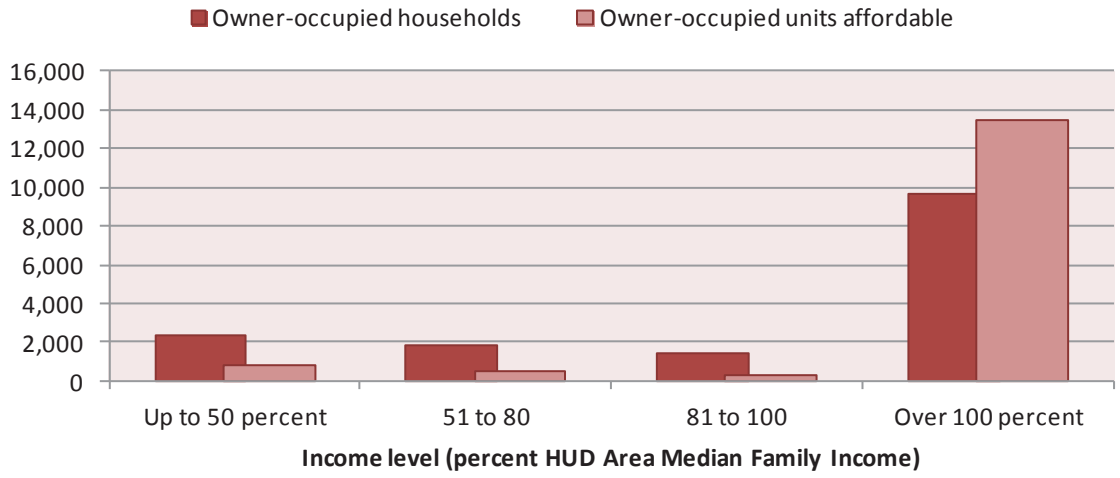
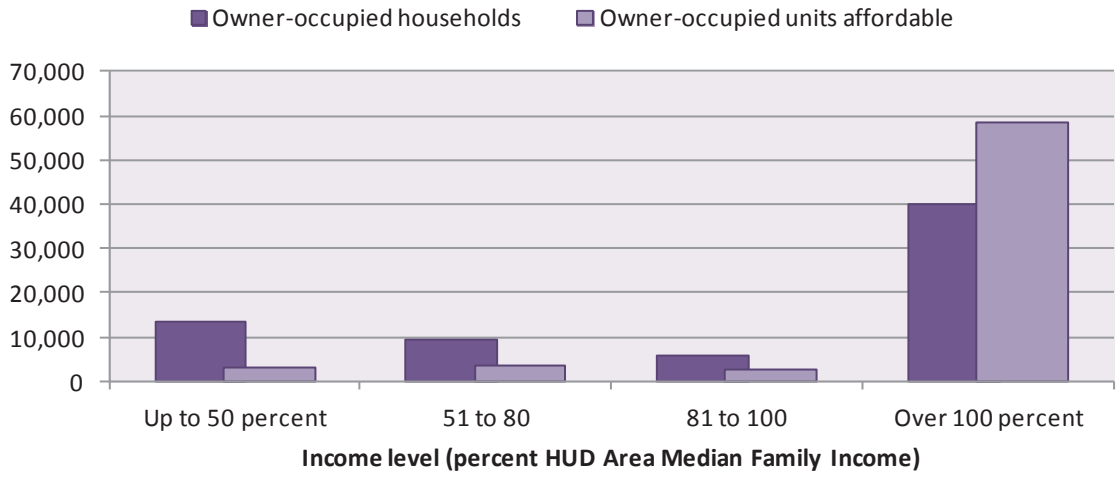


FIGURE 25: ORLEANS PARISH OWNER HOUSEHOLDS BY INCOME AND OWNER UNITS BY AFFORDABILITY



Public Participation and Comments

Public Input Meetings

Three public input meetings were held within the Jefferson Parish Consortium Area during the first week on May 2015. One meeting was held in each jurisdiction and advertised in accordance with the Consortium's Public Participation Plan. Meetings were held in the early evening in order to be most convenient for attendees. In addition placing meeting notices in the newspaper, the notice was distributed to civic associations and faith based organizations in the Consortium.

St. Charles Parish:	Monday, May 4, 2015 4:00 p.m. Alan Artebury Building 14564 River Road New Sarpy, LA 70078
Jefferson Parish:	Tuesday, May 5, 2015 5:00 p.m. Joseph Yenni Building 1221 Elmwood Park Blvd. Ste. 405 Jefferson, LA 70123
City of Kenner:	Wednesday, May 6, 2015 6:00 p.m. Martin Luther King Community Resource Center Conference Room 1042 31st street Kenner, LA 70065

Attendees were provided copies of the Fair Housing Survey and given time to fill them out. Each meeting began with an overview of Fair Housing Laws, protected classes, and examples of different types of discrimination. Next, maps were shown of the racial and ethnic distribution of the area as well as Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs). Discussion was facilitated to better understand the forces that have created these patterns as well as the spatial display of community assets, which populations have better access to such access, and which populations may be limited.

Public Comment Meetings

Two public hearings were held to present information on the draft AI and receive comments from the public regarding the draft. The meeting times and locations are below:

Jefferson Parish:	Thursday, October 8, 2015 4:00 p.m. Joseph Yenni Building 1221 Elmwood Park Blvd. Ste. 405 Jefferson, LA 70123
City of Kenner:	Thursday, October 8, 2015 10:00 am Council Chambers 1801 Williams Boulevard Building A Kenner, LA 70062

Public Comments and Input

Comments submitted by the Greater New Orleans Fair Housing Action Center are included in the Appendix. All suggested recommendations and comments were included in the final document as possible.

Interviews

As part of the AI process, HOME conducted numerous interviews with Community Development staff, GNOFHAC staff, Real Estate agents, members of the Fair Housing working groups, representatives of persons with disabilities and senior citizens, legal aid, representatives of faith based organizations, and non-profit housing developers. HOME took every reasonable effort to contact and interview individuals from diverse interests.

Fair Housing Survey

A Fair Housing Survey was sent to Consortium sub-grantees, faith based organizations, and other community stakeholders. The link to the survey was also on the Parish website. Hard copies of the survey were available at public meetings as well as at the Jefferson Parish Department of Community Development. In total, there were 68 respondents. The full results of the survey can be found in the Appendix, but the following results are describe survey respondents and their experiences:

- 60.6 percent of respondents are homeowners, 33.3 percent are renters, and 6.1 percent are living with relatives.
- When asked, “How familiar are you with fair housing laws?” 14.1 percent were “very familiar,” 40.6 percent were “somewhat familiar,” and, 45.3 percent were “not familiar.”
- 19 respondents provided comments as to how they learned about fair housing laws. Responses included media and news outlets, first time home buyer classes, and professional training.
- When asked if they were aware of fair housing educational or training opportunities 77.1 percent replied “no.”
- When asked if they have participated in fair housing training 80.7 responded “No.”
- When asked to assess the level of fair housing outreach and education, zero respondents indicated that there was “too much,” 28.7 percent indicated there is “too little,” and the majority of respondents were unsure.

- When asked, “Do you believe housing discrimination is an issue in the Jurisdiction in which you reside?” 50 percent of respondents living in the City of Kenner indicated that housing discrimination is an issue; 72.7 indicated it is an issue in Jefferson Parish; and, 23 percent indicated it is an issue in St. Charles Parish.
- 23.4 percent of respondents believe they have experienced housing discrimination.
    - 43.8 percent believe that a landlord/property manager discriminated against them.
    - An equal proportion indicated that a Real Estate Agent was responsible for the discrimination.
    - 37.5 percent indicated that they were discriminated against by an employee of a government housing program.
    - 66.7 percent of respondents indicated that race was the basis of their discrimination.
    - 20 percent indicated color.
    - 6.7 percent indicated national origin.
    - 13.3 percent indicated familial status
    - 6.7 percent indicated disability.
- Only 26.6 percent of those respondents that believe they had been victims of housing discrimination reported the incident.
- When asked why they did not report the incident, 63.6 percent responded that they did not believe it would make a difference.
- Zero respondents indicated they were satisfied with the outcome of their complaint.
- 50 percent of respondents reported the incident to HUD, 25 percent to the Greater New Orleans Fair Housing Action Center, and 25 percent to the Jefferson Parish Department of Community Development.

Impediments to Fair Housing Choice

The identification of impediments to fair housing choice is an ongoing process that, although essential to becoming fully aware of fair housing problems and the resources available to address them, must become a lens through which community development decisions are considered.

Fair Housing Education and Enforcement Capacity is Insufficient

Few, if any, local public resources are available to individuals who believe they have experienced housing discrimination. This includes information on the forms housing discrimination may take place, the rights of individuals under state and federal fair housing laws, and referral services that may point an individual towards fair housing resources.

The Greater New Orleans Fair Housing Action Center (GNOFHAC) provides many of these services as a private, non-profit fair housing organization. Parish staff often refers individuals with fair housing questions and issues to GNOFHAC, but, in the absence of local fair housing protections and administrative resources, a written procedure for receiving and directing fair housing-related inquiries is needed.

Parish websites contain little to no information regarding the fair housing rights of residents. These sites serve as important sources of information for residents, and each should include a brief explanation of fair housing protections and area resources.

The City of Kenner's Hispanic Resource Center provides interpretation services to the area's growing Hispanic community. In that spirit, making fair housing resources available in Spanish is a simultaneous priority.

Goal

Create Fair Housing educational capacity.

Strategies

1. Create online resources that explain fair housing rights to individuals. Include contact information or links to other resources. (In progress, according to Jefferson Parish officials)
2. Create online resources that explain fair housing responsibilities to housing providers. Include contact information or links to other resources. (In progress, according to Jefferson Parish officials)
3. Ensure that information is easily accessible and available in Spanish.
4. Establish and implement a written procedure for the intake and referral of all fair housing-related calls.

Goal

Enhance public fair housing enforcement capacity or support private fair housing enforcement capacity.

Strategies

1. Develop and support a fair housing ordinance.
2. Establish and implement a written procedure for the intake and referral of all fair housing related calls.
3. Establish and implement a written procedure for staff aware of fair housing issues to notify a fair housing coordinator or a fair housing organization.

Fair Housing Awareness

Fair housing awareness – being informed on an individual's rights as a housing-seeker and responsibilities as a housing provider – is a necessary step in creating a fair and open housing market. Awareness is a function of both education on the laws and, when violated, enforcement of them. The lack of education and enforcement capacity at the parish or city level leaves residents without full understanding of their rights and housing providers without clear knowledge of their responsibilities.

The Consortium's 2013 CAPER[25] discusses the challenges facing several assistance programs. Of concern is the denial of applications for wheelchair ramps due to property setbacks. Requirements for ramp construction have also become more cumbersome than in years past requiring a land survey and ramp drawing, in addition to the permit application.

The draft Consolidated Plan states that landlords rarely allow disabled tenants to make accessibility changes in the unit even at the tenant's expense. Simply put, reasonable accommodations are the law; *it is the landlord's responsibility to accommodate tenants as well as allow modifications to the structure, within reason so that the tenant has full accessibility*. Additionally, interviews with parish staff indicated the need for a clearly defined fair housing referral system. An effective referral system to deal with issues as above, which are often times solved with a phone call or letter, and others would affirmatively further fair housing choice throughout the region.

Goal

Improve the fair housing knowledge of public employees and officials.

Strategies

1. Provide or make available fair housing education resources to parish community development staff. Require annual education.
2. Provide or make available fair housing education resources to parish officials.
3. Require consortium partners describe in written detail their efforts to Affirmatively Further Fair Housing annually.

Goal

Ensure the public and housing providers are aware of fair housing laws, their obligations, and its enforcement.

Strategies

1. Engage in or contract out audit-based fair housing testing of the housing market – particularly rental testing and design/construction testing – on a regular basis (at least once every three to five years). Publish these results and develop a strategy to address them.
2. Provide individuals receiving housing or financial counseling with basic fair housing information.

[25] Consolidated Annual Performance and Evaluation Report: an annual report on how Community Development Block Grant funds have been spent, what communities they have served, and what outcomes they have created.

State and Local Legal Frameworks Governing Housing Lack Adequate Protections for Housing Consumers

Shelter, or housing, is an essential human need. In the U.S., housing is also a means of building wealth, earning an income, and accessing public and private resources such as education or employment. The interaction between housing providers and housing consumers is a business relationship. The necessity of shelter can place consumers at a disadvantage when entering into such a relationship, as the housing provider is not likewise seeking an essential human need. Federal protections against discrimination recognize the importance of ensuring fair and equal access to that need.

As noted previously, there are no local fair housing protections in the Jefferson Parish HOME Consortium. The 2013 conciliation agreement between Jefferson Parish, HUD, and the Greater New Orleans Fair Housing Action Center outlined a process by which the parish would draft such an ordinance and submit it to Parish Council for consideration and enactment. This process remains incomplete.

Louisiana's Landlord-Tenant laws leave tenants with few protections against rapid eviction. The law stipulates that landlords may evict tenants in month-to-month leases with no cause, provided they give tenants 10 days written notice. Tenants who are believed to have violated their lease may be evicted with 5 days written notice. Landlords may request that tenants waive the 5 day requirement in the initial signing of the lease. There is no requirement that a landlord give the tenant an opportunity to resolve the alleged lease violation.

The eviction notice requirements (five and ten days) provide tenants with very little time to find alternative housing and move their belongings. If a tenant does not vacate the property within the allotted time, a landlord can begin eviction proceedings in court. Eviction trials are heard three days after the tenant is served with notice of the proceedings. If the court rules in favor of the landlord, the tenant must leave within 24 hours. After those 24 hours, law enforcement may become involved.

Renters who qualify may seek legal help from Southeast Louisiana Legal Services (SLLS). SLLS dedicates a significant amount of time and resources towards representing tenants in eviction proceedings.

Louisiana's landlord-tenant laws heavily favor rental housing providers, placing the renter population (among which, low income, non-white, and female-headed households are overrepresented) at risk of homelessness, substandard housing, or potentially costly court proceedings. The laws place significant burdens on limited legal aid resources, local courts, and law enforcement officials.

The Uniform Residential Landlord and Tenant Act (URLTA), a 1972 standardized sample law created by the National Conference of Commissioners on Uniform State Laws, outlines a 30 day eviction notice period which may be resolved without eviction if the tenant addresses lease violations within 14 days. Similar time periods have been adopted in a number of states, including Alabama, Kansas, Maryland, Virginia, South Carolina, and Tennessee.

The parishes should work towards a solution that provides renters with reasonable timeframes to secure alternate housing or a stock of readily available and affordable quality rental units. Such actions would free public resources as well as needed private resources that are currently utilized in court and law-enforcement based eviction proceedings.

GOAL

Ensure residents of the parishes are adequately protected under law in housing transactions and landlord-tenant relationships.

STRATEGIES

1. Ensure that the Fair Housing Working Group continues its work until a fair housing ordinance is drafted.
2. Investigate the potential impacts of source of income and sex and gender identity-based discrimination. Consider expanding fair housing protections to groups that experience discrimination in securing safe, quality shelter.
3. Encourage state legislators to amend landlord-tenant laws in order to extend the notice period to a reasonable amount of time in line with the URLTA, and to allow tenants to resolve lease violations within a reasonable amount of time.
4. Revise the request for reasonable accommodations process to ensure those residents with disabilities are able to continue to reside in their preferred residential location. The City of New Orleans has a very well documented process that could be used as a model.

Mortgage Lending Patterns Disadvantage Non-traditional Credit

The Jefferson Parish Area prides itself, and rightly so, as a community of homeowners. Discrimination in the mortgage markets has universally prevented minorities, predominantly blacks, from accessing the numerous benefits of home ownership. It has led to entrenched segregated residential patterns, which in turn have exacerbated income disparities across racial/ethnic lines. Local governments bear the responsibility of providing social services and resources to underserved populations. As such, it is in their best interest to ensure that those households desiring and able to become homeowners have the education, stability, and financial capacity to do so free from discrimination.

The data and analysis in this report cannot serve as evidence of individual acts of discrimination by mortgage lenders; it does highlight the disparities in loan outcomes among various racial, ethnic, and income groups and provides insight as to programs and policies the consortium can implement to ensure positive lending outcome for racial/ethnic minorities. In short, there are two distinct strategies to increase minority participation in the private mortgage market.

Goal

Ensure that a variety of housing affordable to varying incomes exists throughout the region.

Strategies

1. Explore and document the benefits of shared-equity housing models such as Community Land Trusts and Limited Equity Cooperatives.
2. Encourage the removal of zoning policies throughout the consortium that may disparately impact protected classes as defined under the Fair Housing Act.
3. The Fair Housing Working Group could be assigned this task.
4. Conduct and report the findings of an Inclusionary Zoning Ordinance/Affordable Dwelling Units Ordinance study that would provide density bonus to developers in exchange for providing affordable units. An ordinance such as this could be useful, particularly on the East Bank, which has little undeveloped land but is more desirable than the West Bank.

Goal

Build the wealth and assets of underserved households.

Strategies

1. Implement system for low income clients to be referred to Individual Development Account (IDA) programs.
2. Continue to allocate funds for down payment and closing cost assistance to first-time home buyers.
3. Provide, document, and report the number of Fair Housing Educational packets provided to housing program participants served by the consortium regardless of funding type. The JeffCAP program would be an appropriate method by which to distribute this information.

Resource Allocations Remain Focused on Rehabilitation Post-Katrina

Community development block grant funding has largely been utilized on housing rehabilitation and public facilities improvement efforts – repairing damaged housing, elevating homes to a flood protected elevation, and addressing water and sewer line improvements. This spending has been a necessity in the post-Katrina years, both to address housing needs and to mitigate the costs of flood insurance. However, the unique housing and infrastructure rehabilitation and retrofitting needs of the region place pressure on finite resources.

Jefferson Parish and its Consortium members must continue to expand existing funding for community and economic development targeted towards areas of need, such as Racially/Ethnically Concentrated Areas of Poverty and low income/low food access areas.

Goal

Enhance, expand, or target funding available for proactive community development.

Strategies

1. Recruit corporate residents, particularly financial institutions, to contribute to community programs that serve their employees, such as down payment assistance and emergency home repair.
2. Explore the creation of an Affordable Housing Trust Fund into which mortgage lenders, developers, local governments, and the state may contribute. Explore this in conjunction with inclusionary zoning practices that may allow developers to contribute to the fund as an alternative to meeting affordable unit set-asides.
3. Explore the Neighborhoods In Bloom strategy of coordinating community development activities and funds to target specific neighborhoods on a rotating basis. Spreading limited funds across a broad area can reduce the impact of community development dollars. Focusing that spending for a set period in one neighborhood (and establishing a list of neighborhoods to follow) has been shown to create immediate positive impacts.[26] This model should be focused on areas with high rates of Racial/Ethnic Poverty.

[26] John Accordino, George Galster, and Peter Tatian, "The Impacts of Targeted Public and Nonprofit Investment on Neighborhood Development" (Federal Reserve Bank of Richmond, July 2005), http://www.community-wealth.org/_pdfs/articles-publications/cdcs/report-accordino-et-al2.pdf.

Gap between Housing Needs and Housing Market

The number of housing units affordable to households with incomes at or below 50 percent of the area median is insufficient to meet the needs of area residents. Housing that exists at that level of affordability is clustered into only a few dense neighborhoods (see Map 14 on page 66). Households at this income level are disproportionately black, Hispanic, and female-headed.

As the demographics of the area continue to follow a decades-long pattern of increasing black and Hispanic households and shrinking white households, the parishes must seek to steer development to meet the needs of these populations.

Goal

Expand the stock of housing affordable to households earning at or below 50 percent of the area median income.

Strategies

1. Adopt inclusionary zoning policies that give incentive to developers to set aside a portion of units as affordable, particularly in neighborhoods with access to strong educational opportunities, transit, and grocers.
2. Give incentive to landlords in high opportunity neighborhoods to accept housing choice vouchers.
3. Provide mobility counseling to voucher-holders.

Goal

Improve the earning potential of low income households.

Strategies

1. Ensure workforce development strategies are a significant component of all economic development strategies.
2. Adopt non-discrimination policies that protect ex-offenders in employment and housing.
3. Ensure public transit routes efficiently and quickly move between residential areas and job centers. Ensure all job centers are accessible by transit.

Historic and Existing Segregation, Division, and Exclusion along Economic and Racial Characteristics

The history of the New Orleans region, like many of the oldest cities in the United States, is one of separation by race and class. This division, while clear on maps such as Map 1 on page 17, was made visible in the aftermath of Hurricane Katrina and levee failures in 2005. The effects of historical and existing segregation and discrimination left many black residents particularly vulnerable to the flooding that engulfed New Orleans. Policies and actions of surrounding parishes in the days and years since have been exclusionary in nature.

Refraining from enacting exclusionary policies will not address existing patterns of segregation. In order to maximize the economic, cultural, and social assets of the area, the parishes must proactively seek to create a housing market based on fair housing choice. That requires acknowledging existing patterns of division and finding ways to encourage inclusive development, economic and social mobility, and equal access to public assets.

There have been well documented examples of elected officials within the Consortium speaking out in opposition to affordable housing development on the basis of increased crime, traffic, and decreased property values. If the parish is honest in its desire to address the "insufficient number of public and private affordable housing units to meet the needs of low to moderate households," as stated in the 2015-2017 Consolidated Plan[27], it would benefit from adopting an inclusive stance as well as an Anti-NIMBY marketing and educational campaign.

Goal

Overcome community opposition to affordable housing (Anti-NIMBYism).

Strategies

1. Develop education and outreach campaign to educate elected officials, residents, and media about the actual impacts of affordable housing developments. To be effective, this campaign must consist of a broad range of community perspectives and backgrounds. The Fair Housing Working Group could be assigned this task.
2. Document and report activities and actions taken to overcome NIMBYism.

Goal

Ensure access to the area's full array of housing options.

Strategies

1. Explore funding opportunities to initiate a mobility counseling program to allow voucher residents greater access to neighborhoods of their choice while simultaneously increasing the number of landlords willing to participate in the voucher program.
2. Create formal longitudinal housing strategy for public housing residents. This plan should focus on household asset and wealth building with an emphasis on moving public housing residents to neighborhoods of their choice using vouchers and mobility counseling.
3. Give incentive to developers to create a mix of housing options in their developments.
4. Update the definitions of "Family" and "Single housekeeping unit" in the Jefferson Parish Code of Ordinances.
5. Allow changes in the zoning code to expand the by right location of Board and Care homes.

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[27] Jefferson Parish Consolidated Plan, 2015-2017. Jefferson HOME Consortium. Summary of Housing Market Analysis, p. 31.

Suggested Prioritization and Timelines

This document contains a variety of suggested approaches to address the identified impediments. The resources and time required to address all impediments are factors that can serve as constraints. In order to establish which of the seven impediments or fair housing issues have the highest priority or may be addressed quickly, each impediment has been ranked on the following factors: the impact of the impediment, the ability of local officials to address them, the time required, and the resources required. The impediments are ordered from one to seven, but a low or high ranking does not infer that the impediment is less relevant or important than another. Some of the most important impediments are also the hardest to address. Addressing a lack of fair housing education and outreach resources may be completed in a short timeframe (one to two years), but addressing historic patterns of segregation will require a greater time commitment (more than ten years). The priority score given to each impediment suggests which impediments may be addressed more quickly or simply, not which impediments are more important.

Issues	**Breadth of Impact (7 = greatest)**	**Capacity to Address (7 = greatest)**	**Time Required (7 = least)**	**Resources Required (7 = fewest)**	**Priority and Timeframe Score**
Insufficient fair housing education and enforcement capacity	5	7	7	7	*26*
Fair housing awareness	1	6	6	6	*19*
Inadequate legal protections for housing consumers	4	5	4	5	*18*
Community development resources limited	3	4	3	3	*13*
Mortgage lending standards disadvantage protected classes	2	1	5	4	*12*
Development patterns do not meet needs of existing market	6	3	2	1	*12*
Historical patterns of segregation	7	2	1	2	*12*

It is with these priority scores and timeframe assessments in mind that the included table of actions, timelines, outcomes, and benchmarks has been assembled. The table is not intended to be all-inclusive, nor should it represent the whole of fair housing-related activity within the Jefferson Parish area. It may serve as a guide towards greater fair housing choice. Some of the actions are quickly achievable. Others are important but difficult to implement. And others may serve as a starting point for conversation and ideas. The methods by which fair housing choice is achieved are of less importance than the outcomes of the actions taken.

Impediment	Action	Timeframe (in years)	Outcome	Benchmark
Insufficient fair housing education and enforcement capacity	Create online resources that explain fair housing rights to individuals. Include contact information or links to other resources. (In progress, according to Jefferson Parish officials)	0-1	Easily accessible fair housing information.	Track number of digital downloads of fair housing materials from Parish website and report annually in CAPER
	Create online resources that explain fair housing responsibilities to housing providers. Include contact information or links to other resources. (In progress, according to Jefferson Parish officials)	0-1	Easily accessible fair housing information.	Track number of digital downloads of fair housing materials from Parish website and report annually in CAPER
	Ensure that information is easily accessible and available in Spanish.	0-1	Easily accessible fair housing information.	Track number of digital downloads of fair housing materials from Parish website and report annually in CAPER
	Establish and implement a written procedure for the intake and referral of all fair housing related calls.	0-1	Increased fair housing enforcement capacity.	Written procedure for intake and referral of all fair housing related calls
	Develop and support a fair housing ordinance.	0-1	Increased fair housing enforcement capacity.	Fair Housing Ordinance
	Establish and implement a written procedure for staff aware of fair housing issues to notify a fair housing coordinator or a fair housing organization.	0-1	Increased fair housing knowledge	Report in annual CAPER the number of fair housing referrals
Low fair housing awareness	Provide or make available fair housing education resources to parish community development staff. Require annual education.	0-1	Increased fair housing knowledge	Report in CAPER annually the number of staff to receive fair housing training
	Provide or make available fair housing education resources to parish officials.	0-1	Increased fair housing knowledge	Report in CAPER annually the number of Parish officials to receive fair housing training
	Require consortium partners describe in written detail their efforts to Affirmatively Further Fair Housing annually.	1-2	Increased fair housing knowledge	Report in CAPER annually
	Engage in or contract out audit-based fair housing testing of the housing market – particularly rental testing and design/construction testing – on a regular basis (at least once every three to five years). Publish these results and develop a strategy to address them.	2	Increase fair housing enforcement capacity	Public report on the findings of the investigation to include strategies to address.
	Provide individuals receiving housing or financial counseling with basic fair housing information.	0-1	Increased fair housing knowledge	Track the number of fair housing informational packets distributed annually and report in the annual CAPER

Impediment	Action	Timeframe (in years)	Outcome	Benchmark
Inadequate legal protections for housing consumers	Ensure that the Fair Housing Working Group continues its work until a fair housing ordinance is drafted.	0-1	Increased legal protections for residents	Fair Housing Ordinance
	Investigate the potential impacts of source of income and sex and gender identity-based discrimination. Consider expanding fair housing protections to groups that experience discrimination in securing safe, quality shelter.	2-3	Increased legal protections for residents	Report on the findings of the investigation
	Revise the request for reasonable accommodations process to ensure those residents with disabilities are able to continue to reside in their preferred residential location.	0-1	Increased legal protections for residents	Revised reasonable accomodation process.
	Encourage state legislators to amend landlord-tenant laws in order to extend the notice period to a reasonable amount of time in line with the URLTA, and to allow tenants to resolve lease violations within a reasonable amount of time.	3-5	Increased legal protections for residents	Parish resolution
Lending practices disadvantage protected classes	Explore and document the benefits of shared-equity housing models such as Community Land Trusts and Limited Equity Cooperatives.	2-4	Increased lending to protected classes	Report on the findings of the investigation
	Encourage the removal of zoning policies throughout the Consortium which may disparately impact protected classes as defined under the Fair Housing Act.	3-5	Increased lending to protected classes	Report on the findings of a comprehensive disparate impact zoning analysis
	Conduct and report the findings of an Inclusionary Zoning Ordinance/Affordable Dwelling Units Ordinance study that would provide density bonus to developers in exchange for providing affordable units. An ordinance such as this could be useful, particularly on the East Bank which has little undeveloped land but is more desirable than the West Bank.	2-4	Increased lending to protected classes	Public report on the findings of the study
	Implement system for low income clients to be referred to Individual Development Account (IDA) programs.	1-2	Increased lending to protected classes	Coordinate a documented IDA referral system. Report the number of IDA referrals in CAPER annually
	Continue to allocate funds for down payment and closing cost assistance to first time home buyers.	0-1	Increased lending to protected classes	Continue to report the number of households served through these programs in the CAPER
	Provide, document, and report the number of Fair Housing Educational packets provided to housing program participants served by the Consortium regardless of funding type. The JeffCAP program would be an appropriate method by which to distribute this information.	1-2	Increased lending to protected classes	Creation of fair housing educational packet. Report the number of packets distributed annually in the CAPER

Impediment	Action	Timeframe (in years)	Outcome	Benchmark
Resources are tied up in addressing other needs	Recruit corporate residents, particularly financial institutions, to contribute to community programs that serve their employees, such as down payment assistance and emergency home repair.	3-5	Expansion of limited resources	Create workgroup (possibly through a partnership with JEDCO) to build capacity
	Explore the creation of an Affordable Housing Trust Fund into which mortgage lenders, developers, local governments, and the state may contribute. Explore this in conjunction with inclusionary zoning practices that may allow developers to contribute to the fund as an alternative to meeting affordable unit set-asides.	4-5	Expansion of limited resources	Create an Affordable Housing Trust Fund working group to develop a strategy to create and fund an Affordable Housing Trust Fund
	Explore the Neighborhoods In Bloom strategy of coordinating community development activities and funds to target specific neighborhoods on a rotating basis. Spreading limited funds across a broad area can reduce the impact of community development dollars. Focusing that spending for a set period of time in one neighborhood (and establishing a list of neighborhoods to follow) has been shown to create immediate positive impacts.	3-5	Expansion of limited resources	Report on efficacy and practicality of spatially targeting limited resources.
Housing patterns do not meet needs of housing market	Adopt inclusionary zoning policies that incentivize developers to set aside a portion of units as affordable, particularly in neighborhoods with access to strong educational opportunities, transit, and grocers.	4-5	Equitable housing markets	Adoption of inclusionary zoning policies
	Incentivize landlords in high opportunity neighborhoods to accept housing choice vouchers.	2-3	Equitable housing markets	Explore the numerous incentives for incentivizing landlords to accept housing choice vouchers. Report the number of new landlords annually in the CAPER
	Provide mobility counseling to voucher-holders.	2-3	Equitable housing markets	Establishment of a mobility counseling program.
	Ensure workforce development strategies are a significant component of all economic development strategies.	2	Equitable housing markets	Partnership with JEDCO
	Adopt non-discrimination policies that protect ex-offenders in employment and housing.	3-5	Equitable housing markets	Parish Resolution
	Ensure public transit routes efficiently and quickly move between residential areas and job centers. Ensure all job centers are accessible by transit.	2-4	Equitable housing markets	Annual or biannual updates on transit accessibility goals and progress.

Impediment	Action	Timeframe (in years)	Outcome	Benchmark
Historic patterns of segregation	Develop education and outreach campaign to educate elected officials, residents, and media about the actual impacts of affordable housing developments. To be effective, this campaign must consist of a broad range of community perspectives and backgrounds. The Fair Housing Working Group could be assigned this task.	1-2	More fully integrated housing patterns	Coordinate and implement an annual Anti-NIMBYism training for elected officials, residents, and media. Report the number of attendees annually in CAPER.
	Document and report activities and actions taken to overcome NIMBYism.	1-2	More fully integrated housing patterns	Report activities and actions annually in CAPER.
	Explore funding opportunities to initiate a mobility counseling program to allow voucher residents greater access to neighborhoods of their choice while simultaneously increasing the number of landlords willing to participate in the voucher program.	3-5	More fully integrated housing patterns	Annual reports on progress identifying funding sources, counseling services (internal or external), collaborative partners (including housing authority(s), and landlords. If funding is secured for a mobility program, annual reports on number of clients served and spatial mobility information.
	Create formal longitudinal housing strategy for public housing residents. This plan should focus on household asset and wealth building with an emphasis on moving public housing residents to neighborhoods of their choice through the use of vouchers and mobility counseling.	5	More fully integrated housing patterns	Creation of a publicly available housing strategy document with implementation strategies
	Update definitions of "Family" and "Single housekeeping unit" in the Jefferson Parish Code of Ordinances.	0-1	More fully integrated housing patterns	Updated definition in the Code of Ordinances
	Allow changes in the zoning code to expand the by right location of Board and Care homes	0-1	More fully integrated housing patterns	Increased access to housing options for residents.
	Incentivize developers to create a mix of housing options in their developments.	3-5	More fully integrated housing patterns	Documentation of incentives and efforts to encourage developers to set aside a portion of units to be affordable to families with lower incomes.

APPENDIX

COMMENT LETTER, GREATER NEW ORLEANS FAIR HOUSING ACTION CENTER

GREATER NEW ORLEANS
FAIR HOUSING ACTION CENTER

BOARD OF DIRECTORS
TRACY LEA
Board Chair
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DAVID MUNROE
JUSTIN WOODS
EXECUTIVE DIRECTOR
CASHAUNA HILL

Detrich Hebert Johnson
Director of Community Development
Jefferson Parish
1221 Elmwood Pk. Blvd., Suite 605
Jefferson, LA 70123

October 8th, 2015

Dear Ms. Hebert Johnson,

The Greater New Orleans Fair Housing Action Center (GNOFHAC) welcomes the Jefferson Parish HOME Consortium draft Analysis of Impediments to Fair Housing Choice (AI).

We appreciate the Consortium's willingness to work to write a meaningful AI in accordance with the legal obligation to affirmatively further fair housing choice, in fulfillment of the June 24th, 2013 Conciliation Agreement executed by the Parish in HUD Case Nos. 06-10-1478-6,-8, and-9.

The draft AI made available for public comment is an excellent planning document and resource. We submit these comments in the spirit of future collaboration, and would like to especially draw attention to the ways in which this AI may help the consortium to better direct federal funds to projects and programs that meet the highest needs.

Funding Considerations:

1) The jurisdiction should invest in education, awareness and outreach to help Jefferson Parish residents learn more about their rights and fair housing responsibilities.
2) The AI should recommend that the jurisdictions in the consortium target community development activities and funds in R/ECAP and other high-poverty and highly segregated areas. The current "Neighborhoods in Bloom" strategy does not take these variables

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into consideration.

3) Discrimination against survivors of domestic violence in Jefferson Parish is rampant, with survivors surveyed in area shelters reporting a high rate of shelter occupancy *because* they had been evicted from an apartment based on the abuse against them. The Parish should consider expanding its contract with Metropolitan Center for Women to include fair housing training for staff, clients, and area housing providers.its contract with Metropolitan Center for Women to include fair housing training for staff, clients, and area housing providers. 4) Page 71 notes a gap between housing needs and the housing market, with housing units affordable to households with incomes at or below 50% of he AMI insufficient to meet the needs of area residents. Yet, according to the Jefferson Parish Action Plan, the consortium dedicates approximately *6 times* what it spends on housing for the most vulnerable populations on homeownership activities and administration.

Below is an analysis of Consortium only funds.

HOME Funds: **$949,641 for activities for homeowners** (First time homebuyer program and owner-occupied rehab) *All of the HOME funds CDBG Funds: **$955,000 for activities for homeowners** (Homeownership training, emergency home repairs, Jefferson Joining Forces, Housing Repairs on Wheels, and Housing Rehabilitation) CDBG Funds: **$484,245 in Administration**

$156,979 in "Contingency"

Total: $2,545,865 for homeowners and administration

Funds for households with incomes at or below 50% AMI: HOME Funds: $0 CDBG Funds: $160,000 (Homeless supportive housing) ESG Funds: $247,424 (Rental assistance and homeless stabilization)

Total: $407,424 for very low income individuals

Jefferson Parish allocates an additional $868,192 in homeownership activities; City of Kenner an additional $116,599 in homeownership activities; and St. Charles Parish an additional $65,763 in homeownership activities.

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The AI does not include an analysis of homeownership based on income level. Particularly in rural areas, it is feasible that there is high demand for homeowner rehabilitation programs and other owner-occupied housing funding streams for low-income people. Yet, the minute amount dedicated to new construction, development of rentals, as well as rental assistance or homelessness prevention, is probably the reason for the astounding gap between housing needs and the housing market. The consortium simply has not invested where the need is the highest.

Given that Black, Hispanic and Asian households earning 30-50% AMI experience severe housing problems at rates disproportionate to the overall population, it is likely that the consortium's spending decisions disproportionately negatively impact people of color.

5) There appears to be a mismatch in policy and funding availability for people with disabilities. On the one hand, a high percentage of funds seem to be available to people with disabilities to modify homeowner occupied homes, yet, there is no clear process for reasonable accommodations or reasonable modifications that is available to the public.

CDBG Funds: **$300,000 for activities for homeowners**
(Exterior ramps, grab bars, safety assessments and home repairs)
$270,000 for activities for homeowners
(an additional pool of funds with an "elderly and disabled" preference)

The parish should work to update their zoning code and parish services to provide adequate access to reasonable accommodations and reasonable modifications for homeowners and renters.

6) Given that Black, Hispanic and Asian households earning 30-50% AMI experience severe housing problems at rates disproportionate to the overall population, it is likely that the consortium's decision to set aside 100% of its HCVP vouchers for people with disabilities disproportionately negatively impacts people of color. This decision is also certain to negatively impact families with children. It is also likely that the consortium's decision to not utilize vouchers for 330 families that it is authorized to use also disproportionately negatively impacts people of color.

D

Additional Overall Observations:

Pages 12-13: The compendium of some of the most egregious and publicly recognized public sector impediments to fair housing choice in the consortium is helpful. It may also be helpful if the AI were to recommend corresponding actions to overcome impediments listed. Similarly, a more robust description of the kinds of discrimination individuals—particularly renters--face would be helpful. Page 10: The report on complaints of discrimination is a little misleading ("Approximately one-third of complaints were classified as "no cause", meaning that investigators could not find sufficient evidence of illegal discrimination."). No cause findings not are determinative, and victims can still find relief in the courts. In other words, a no cause finding is not evidence that discrimination did not occur. Page 25: It may be helpful if the AI presented deeper analysis of the zoning code. Included in this should be, at the very minimum, an analysis of where multi-family housing is allowed by right, and an analysis of the parish reasonable accommodations process. Page 75: The AI notes that local fair housing protections are not available, then further notes that the "Fair Housing Working Group should continue its work." Reportedly, the draft ordinance required by the 2013 agreement is "at the parish attorney's office", where it has been for over a year. Interpreted another way, the lack of local fair housing protections despite a 2013 conciliation agreement requiring such protections could be evidence of the very disinterest and lack of political will among consortium stakeholders to uphold civil rights, which in and of itself is an impediment. Overall: A demographic analysis by housing type would be helpful to ensure the consortium can make data driven funding decisions.

Additional Actions to Overcome Impediments:

1) The AI should recommend passage of a voluntary inclusionary zoning policy that incentivizes development in high opportunity zoning districts within one year and the market study of a mandatory policy to be completed in two years.
2) The AI should recommend a change in the zoning code that reduces parking requirements for developments with affordable units.
3) The AI should recommend a reasonable accommodations amendment to the jurisdictions' zoning codes, similar to the article recently added to the New Orleans Comprehensive Zoning

E

Ordinance.

4) The suggested re-definition of “Family” and “Single housekeeping unit,” as well as the re-zoning of single family districts to include Board and Care homes on page 26 are important zoning recommendations, and they should also be included in the strategies to address impediments (page 65) and in the timelines and benchmarks (page 74).
5) A recent audit by the Greater New Orleans Fair Housing Action Center revealed that criminal background screening policies were used as a pretext for racial discrimination in 67% of tests conducted in Jefferson Parish. The Jefferson Parish Council could address this problem by passing an ordinance similar to the federal Fair Credit Reporting Act, and require that housing providers issue both a written reason for the denial, as well as a copy of the criminal background report that was used as the basis for denial, to prospective tenants.
6) It would be helpful if additional recommendations or information were available as to how the consortium could or should use federal funding sources to desegregate the consortium communities, in short, clear, actionable items.

We welcome the opportunity to continue to work with the consortium and its contractor to update the draft AI to reflect these comments. We also urge the consortium to take information found in the draft AI into consideration before finalizing any funding decisions, including finalizing its draft FY15 Action or 2015-2017 Consolidated Plans.

Sincerely,

Cashauna Hill, Executive Director, Greater New Orleans Fair Housing Action Center

F

JEFFERSON PARISH HOME CONSORTIUM FAIR HOUSING SURVEY

In which Jurisdiction is your primary place of residence located?

Answer Options	Response Percent	Response Count
Jefferson Parish	37.3%	25
St. Charles Parish	44.8%	30
City of Kenner	14.9%	10
Other (please specify)	3.0%	2

In which Jurisdiction is your primary place of work?

Answer Options	Response Percent	Response Count
Jefferson Parish	43.9%	29
St. Charles Parish	21.2%	14
City of Kenner	9.1%	6
Other (please specify)	25.8%	17

Do you rent or own the place where you live?

Answer Options	Response Percent	Response Count
Own	60.6%	40
Rent	33.3%	22
Other (please specify)	6.1%	4

How familiar are you with fair housing laws?

Answer Options	Response Percent	Response Count
Not familiar	45.3%	29
Somewhat familiar	40.6%	26
Very familiar	14.1%	9
If you selected "Somewhat familiar" or "very familiar," please describe		19

Do you believe housing discrimination is an issue in the Jurisdiction in which you reside?

Answer Options	Response Percent	Response Count
Yes	43.8%	28
No	35.9%	23
Not Sure	20.3%	13

Do you believe you have ever experienced housing discrimination?

Answer Options	Response Percent	Response Count
Yes	23.4%	15
No	73.4%	47
Not Sure	3.1%	2

G

Who do you believe discriminated against you? (Check all that apply)		
Answer Options	**Response Percent**	**Response Count**
Landlord/Property Manager	43.8%	7
Real Estate Agent	43.8%	7
Mortgage Lender	0.0%	0
Mortgage Insurer	0.0%	0
Government housing program staff person	37.5%	6
Other (please specify)	12.5%	2

On what basis do you believe you were discriminated against? (Check all that apply)			
Answer Options		**Response Percent**	**Response Count**
Race	Race	66.7%	10
Color	Color	20.0%	3
Religion	Religion	0.0%	0
National	National Origin	6.7%	1
Sex	Sex	0.0%	0
Familial	Familial Status (e.g. single-parent with	13.3%	2
Disability	Disability	6.7%	1
Other	Other (please specify)	13.3%	2

Did you report the incident?		
Answer Options	**Response Percent**	**Response Count**
Yes	26.7%	4
No	73.3%	11

To whom did you report the incidence of housing discrimination?		
Answer Options	**Response Percent**	**Response Count**
Department of Housing and Urban Development	50.0%	2
Greater New Orleans Fair Housing Action Center	25.0%	1
Louisiana Department of Justice	0.0%	0
Other (please specify)	25.0%	1

Were you satisfied with the outcome?		
Answer Options	**Response Percent**	**Response Count**
Yes	0.0%	0
No	100.0%	3
If you answered "no," please explain		1

H

If you believe you were discriminated against and did not report the incident, why did you choose not to?		
Answer Options	**Response Percent**	**Response Count**
Didn't know where or who to report the incident to	9.1%	1
Afraid of retaliation	9.1%	1
Didn't believe it would make a difference	63.6%	7
Process to file a complaint too difficult or complicated	0.0%	0
Discouraged by someone	9.1%	1
Other (please specify)	9.1%	1

If you have a disability, have you ever been denied flexibility in the rules, policies, or practices of your residence, neighborhood, or community?		
Answer Options	**Response Percent**	**Response Count**
Yes	0.0%	0
No	25.0%	15
I do not have a disability	75.0%	45

What was your request that was denied?	
Answer Options	**Response Count**
	0

Are you aware of any educational activities or training opportunities available to you to learn about fair housing laws?		
Answer Options	**Response Percent**	**Response Count**
Yes	22.8%	13
No	77.2%	44

Have you participated in fair housing activities or training?		
Answer Options	**Response Percent**	**Response Count**
Yes	19.3%	11
No	80.7%	46

Please assess the level of fair housing outreach and education activity in the Jurisdiction in which you live.		
Answer Options	**Response Percent**	**Response Count**
There is too much	0.0%	0
There is the right amount	12.3%	7
There is too little	28.1%	16
Not Sure	59.6%	34

I

If you work in a housing related field, which of the following roles best describes your job?		
Answer Options	**Response Percent**	**Response Count**
Private (Banking/Finance, Construction/Development,	5.2%	3
Public (Government)	10.3%	6
Non-Profit Sector (Housing provider, counselor)	6.9%	4
I do not work in a housing related field	77.6%	45

The rental housing market? (Example: Refusing to rent based on religion or color.)		
Answer Options	**Response Percent**	**Response Count**
Yes	7.5%	4
No	41.5%	22
Don't know	50.9%	27
If you answered "Yes" to this question, please discuss below.		3

The real estate industry? (Example: A real estate agent showing properties to families with children only in specific areas and/or failing to		
Answer Options	**Response Percent**	**Response Count**
Yes	11.3%	6
No	39.6%	21
Don't know	49.1%	26
If you answered "Yes" to this question, please discuss below.		3

The mortgage and home lending industry? (Example: Offering higher interest rates to equally qualified women or racial minorities.)		
Answer Options	**Response Percent**	**Response Count**
Yes	9.6%	5
No	44.2%	23
Don't know	46.2%	24
If you answered "Yes" to this question, please discuss below.		3

The housing construction or housing design fields? (Example: New rental complexes built with narrow doorways that do not allow wheelchair		
Answer Options	**Response Percent**	**Response Count**
Yes	0.0%	0
No	40.4%	21
Don't know	59.6%	31
If you answered "Yes" to this question, please discuss below.		0

J

The home insurance industry? (Example: Offering different coverage or policy terms to racial minorities or minority neighborhoods.)		
Answer Options	**Response Percent**	**Response Count**
Yes	10.2%	5
No	30.6%	15
Don't know	59.2%	29
If you answered "Yes" to this question, please discuss below.		2

The home appraisal industry? (Example: Basing home values on the ethnic composition of neighborhoods.)		
Answer Options	**Response Percent**	**Response Count**
Yes	11.5%	6
No	42.3%	22
Don't know	46.2%	24
If you answered "Yes" to this question, please below.		2

Any other housing services?		
Answer Options	**Response Percent**	**Response Count**
Yes	1.9%	1
No	51.9%	27
Don't know	46.2%	24
If you answered "Yes" to this question, please discuss below.		1

Land use policies? (Examples: Policies that concentrate multi-family housing in limited areas; restrictions on specific land-uses.)		
Answer Options	**Response Percent**	**Response Count**
Yes	13.6%	6
No	38.6%	17
Don't know	47.7%	21
If you answered "Yes" to this question, please discuss below.		5

Zoning laws? (Example: Laws that restrict placement of group homes.)		
Answer Options	**Response Percent**	**Response Count**
Yes	4.5%	2
No	38.6%	17
Don't know	56.8%	25
If you answered "Yes" to this question, please discuss below.		1

K

Occupancy standards or health and safety codes? (Example: Codes being inadequately enforced in immigrant communities.)		
Answer Options	**Response Percent**	**Response Count**
Yes	2.3%	1
No	36.4%	16
Don't know	61.4%	27
If you answered "Yes" to this question, please discuss below.		1

Property assessment and tax policies? (Example: Assessors making decisions based on the racial composition of neighborhoods.)		
Answer Options	**Response Percent**	**Response Count**
Yes	0.0%	0
No	38.6%	17
Don't know	61.4%	27
If you answered "Yes" to this question, please discuss below.		0

The permitting process? (Example: Not offering written documents on procedures in alternate languages.)		
Answer Options	**Response Percent**	**Response Count**
Yes	4.5%	2
No	27.3%	12
Don't know	68.2%	30
If you answered "Yes" to this question, please discuss below.		2

Housing construction standards? (Example: Lack of or confusing guidelines for construction of accessible housing.)		
Answer Options	**Response Percent**	**Response Count**
Yes	7.0%	3
No	30.2%	13
Don't know	62.8%	27
If you answered "Yes" to this question, please discuss below.		3

Neighborhood or community development policies? (Example: Policies that encourage development in narrowly defined areas of the community.)		
Answer Options	**Response Percent**	**Response Count**
Yes	2.4%	1
No	31.0%	13
Don't know	66.7%	28
If you answered "Yes" to this question, please discuss below.		1

L

Are you aware of any barriers that limit access to government services, such as a lack of transportation or employment services?		
Answer Options	**Response Percent**	**Response Count**
Yes	14.3%	6
No	42.9%	18
Don't know	42.9%	18
If you answered "Yes" to this question, please below.		5

Are there any other public administrative actions or regulations in your community that act as barriers to fair housing choice?		
Answer Options	**Response Percent**	**Response Count**
Yes	4.7%	2
No	32.6%	14
Don't know	62.8%	27
If you answered "Yes" to this question, please indicate the		1

If there are additional comments or information you wish to provide that you feel will benefit this survey please do so in	
Answer Options	**Response Count**
	4