

City of Columbia

Anaylsis of Impediments to Fair Housing Choice 2014 Update for 2015-2019 Consolidated Plan

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1. Introduction and Summary of Document

Document Purpose

“Entitlement Communities” or communities qualifying for an annual allocation of Community Development Block Grant and/or HOME funds are required to conduct an analysis of impediments to fair housing choice as part of each Consolidated Plan in order to qualify for annual funding. This document is the City of Columbia’s Analysis of Impediments (AI) to fair housing choice. Impediments to fair housing choice are “Any actions, omissions, or decisions taken because of race, color, age religion, sex disability, familial status, ancestry, national origin, or sexual orientation, which restrict housing choices or the availability of housing choices, or have the effect of restricting housing choices.” This analysis provides guidance for the City’s fair housing efforts identified, while forming its 2015-2019 Consolidated Plan.

Methodology

City staff used American Community Survey and census data to provide an overview of demographics, neighborhood amenities and housing conditions. A summary of this data was provided to a fair housing focus group consisting of 19 people representing various agencies and populations in Columbia. This report contains a more in-depth summary of data analyzed by City staff. The fair housing focus group utilized the summary data to guide their discussion of the following two questions:

1. What are the most significant fair housing problems in Columbia?
2. What are the most important strategies the City should undertake to further fair housing in Columbia? (What should we be doing to address fair housing needs)

Staff utilized input from the fair housing meeting to formulate the City’s strategies to address fair housing needs in Columbia. The fair housing strategies contained in this document and a review of the AI was conducted by Community Development Commission (CDC) members at the December 11, 2013 CDC fair housing public hearing. The draft AI including CDC recommendations will go before Council in early 2014.

Prioritized Needs and Strategies

The fair housing focus group was asked to prioritize each of the fair housing needs and strategies to address those needs. City staff narrowed the list down to the top four needs and strategies to focus efforts and increase impact on the most critical fair housing needs in Columbia. Additional needs and strategies identified through data analysis are also included.

2. Population and Demographics

Race and Ethnicity

The racial composition of the City of Columbia is shown in figures 1 and 2 below. 2010 census data shows 79% of Columbia's 108,500 citizens are white, while the remaining 21% are non-white.

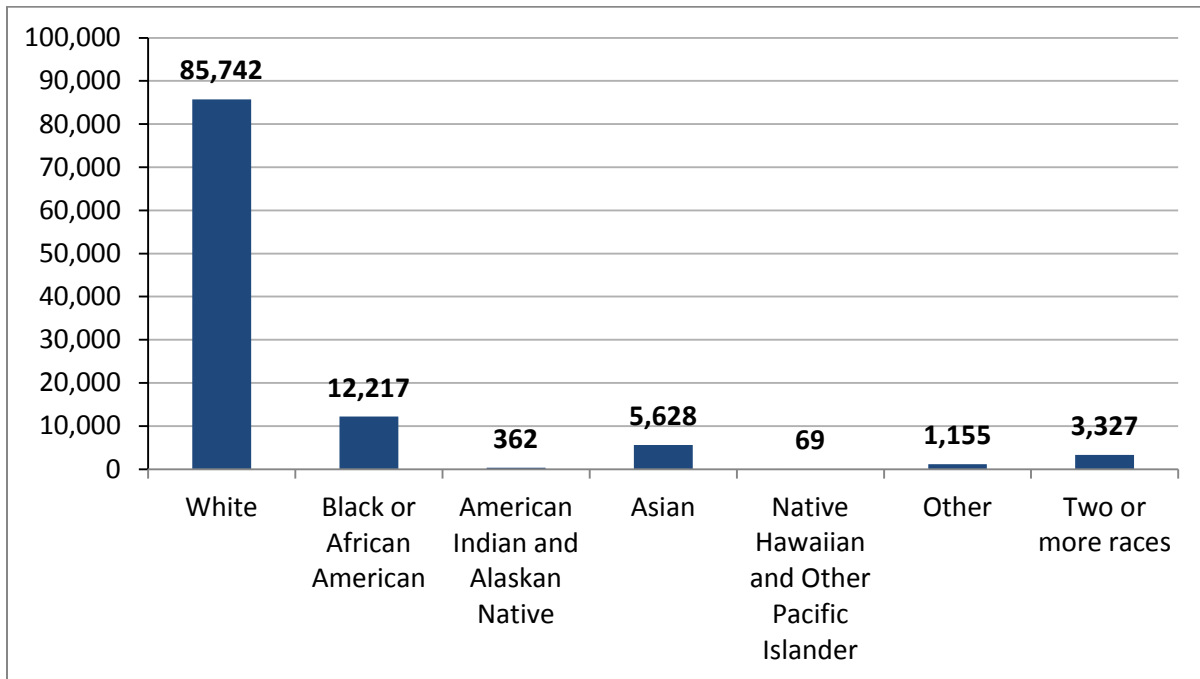


Figure 1 Population by Race

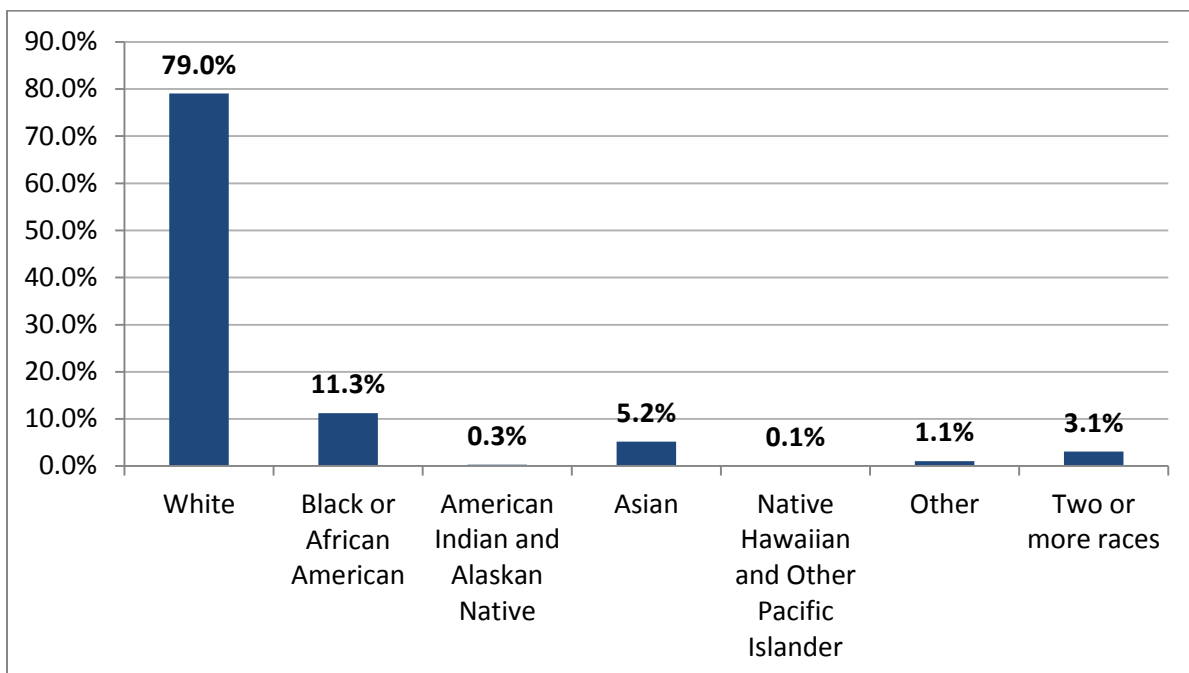


Figure 2 Percent of Population by Race

The total non-white population increased from 18.5% to 21% in 2010 according to census data. Columbia's Asian population has risen to 5.2% in 2010 from 4% in 2008. The Asian population experienced the most growth in Columbia since the previous AI. The African American population remained relatively stable at 11.3%, up from 11%. The Hispanic population has risen from 2% in 2000 to 3% according to 2010 census data. The Hispanic population was reported as the fastest growing minority population in the City's previous AI as shown by 1990 and 2000 census data. Figure 3 displays the percent of Columbia's population by Hispanic or non-Hispanic ethnicity.

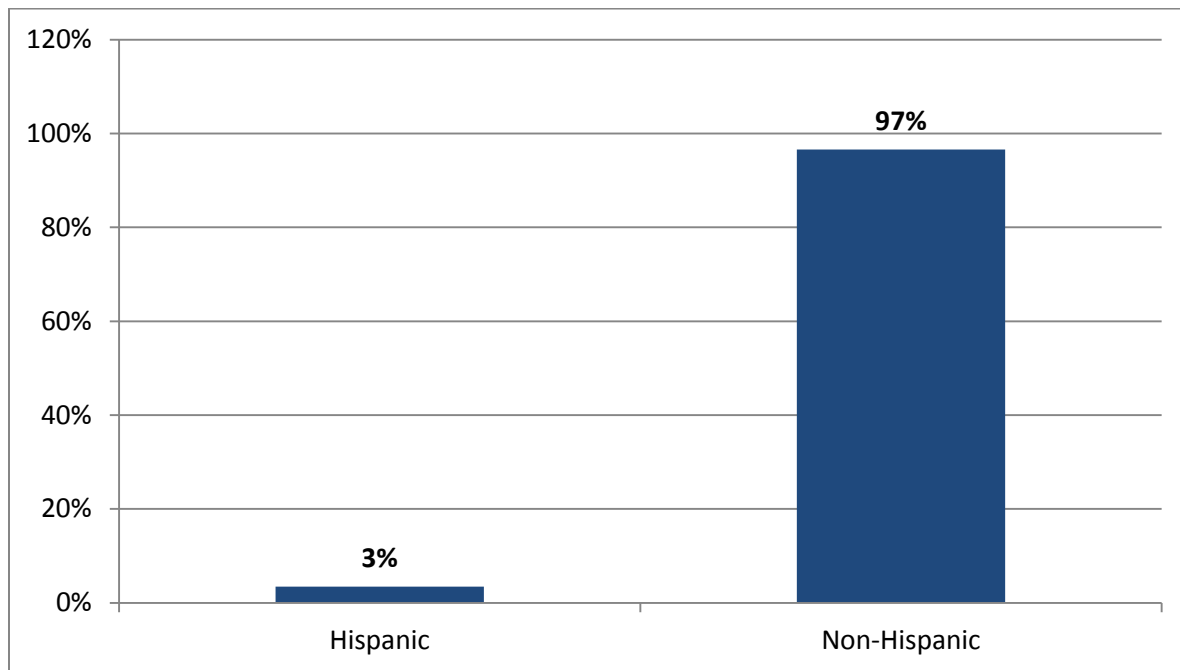


Figure 3 Percent of Population by Hispanic or Non-Hispanic Ethnicity

Figure 4 indicates that 10.6% of households that do not speak English at home, Asian languages and Spanish are a majority of the households that do not primarily speak English at home. This data further identifies Asian and Hispanic minority populations as significant populations in Columbia.

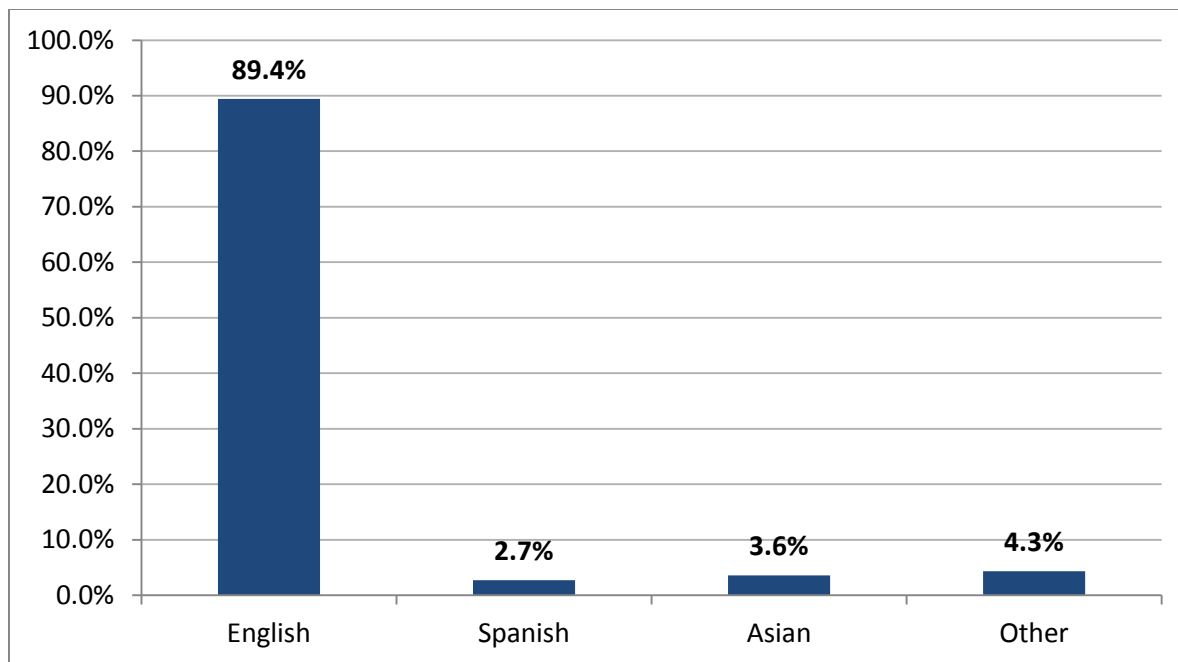


Figure 4 Percent Language Spoken at Home by Language Type

Figure 5 shows 92% of Columbia citizens are born in the U.S., while the remaining 8% were born outside of the U.S.

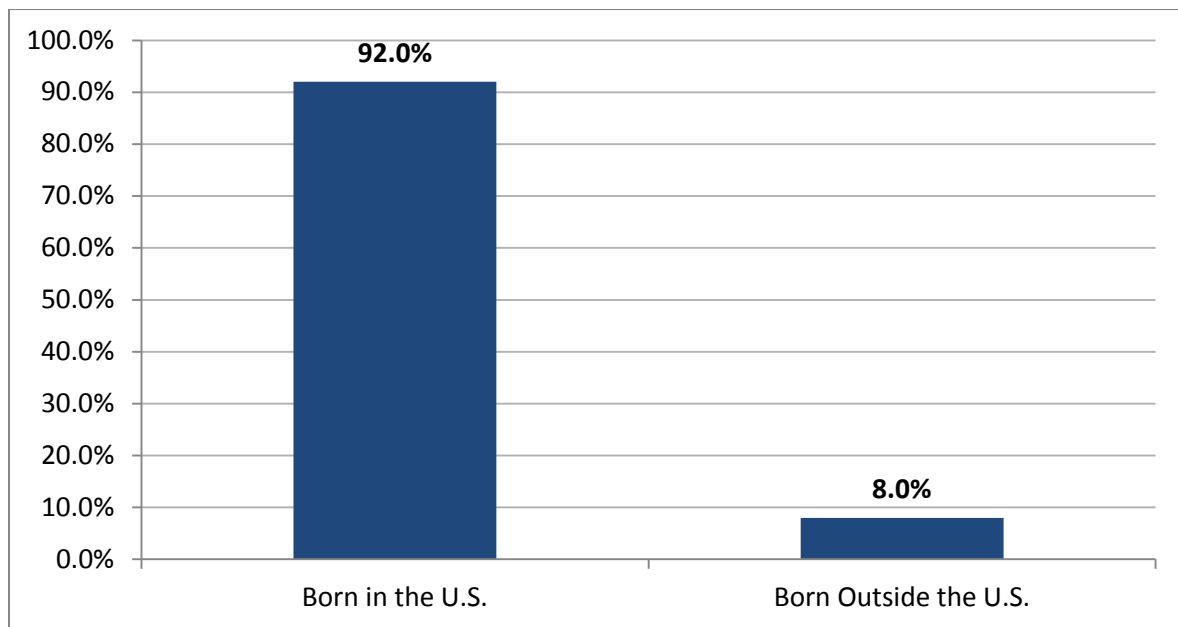


Figure 5 Percent of Population by National Origin

Demographic Trends

Geospatial data is included in the City's AI and Consolidated Plan to help identify impediments to fair housing and other community development needs. Needs and strategies identified in the AI will guide fair housing efforts identified in the Consolidated Plan. Since the AI must be completed first, Community Development (CD) staff is analyzing data directly related to the AI and will conduct further analysis of housing needs and market conditions during development of the Consolidated Plan.

African American Population Data

CD staff reviewed African American population densities and historical data for Columbia in order to determine trends. Staff reviewed the historical number of African Americans by census block, current number of African Americans by census blocks, as well as the percent change in African American populations by census block from 1990 to 2010.

Trends and Initial Findings

The following GIS maps indicate demographic shifts in the African American population from 1990 to 2010:

- Figure 6: 1990 Columbia Census African American Population by Block
- Figure 7: 2010 Columbia Census African American Population by Block
- Figure 8: 1990-2010 African American Population Change by Number

Figure 6 and 7 indicate African American populations are higher in the Central City area in 1990 than in 2010. Figure 8 also identifies this change in population and demonstrates that African Americans are moving from the central city area and relocating to the city's periphery, particularly in north and northeast Columbia.

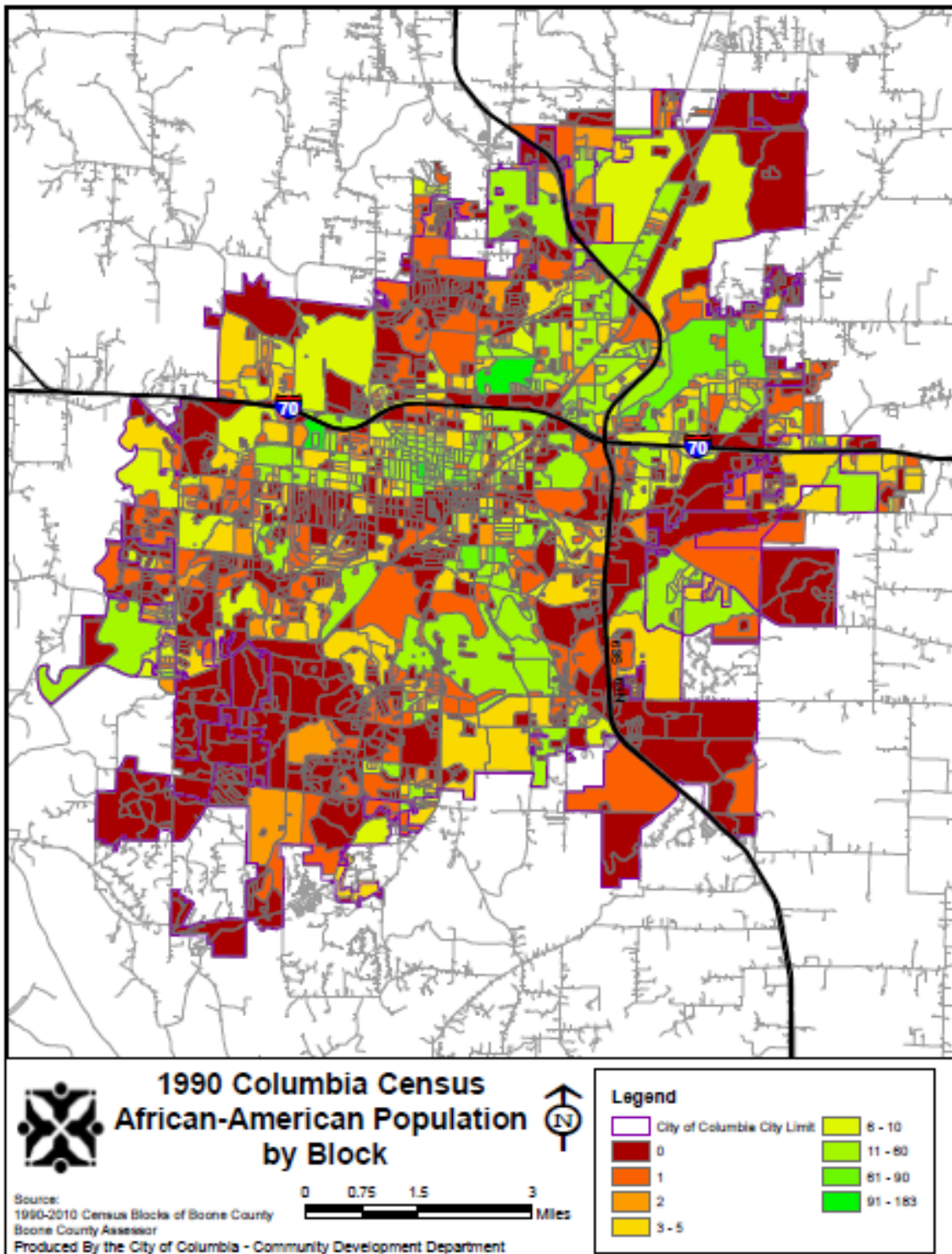


Figure 6 1990 Columbia Census: African-American Population by Block

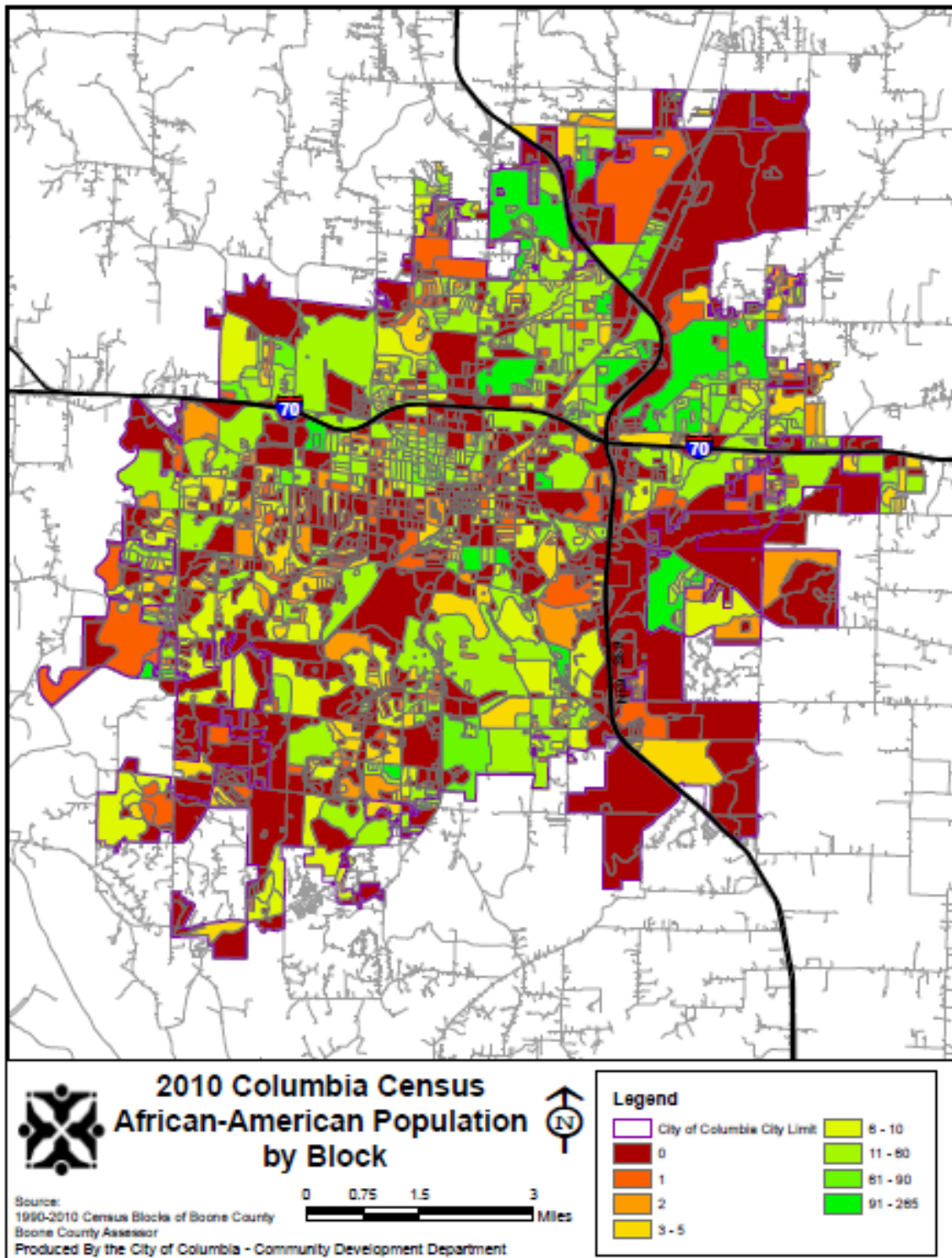


Figure 7 2010 Columbia Census: African-American Population by Block

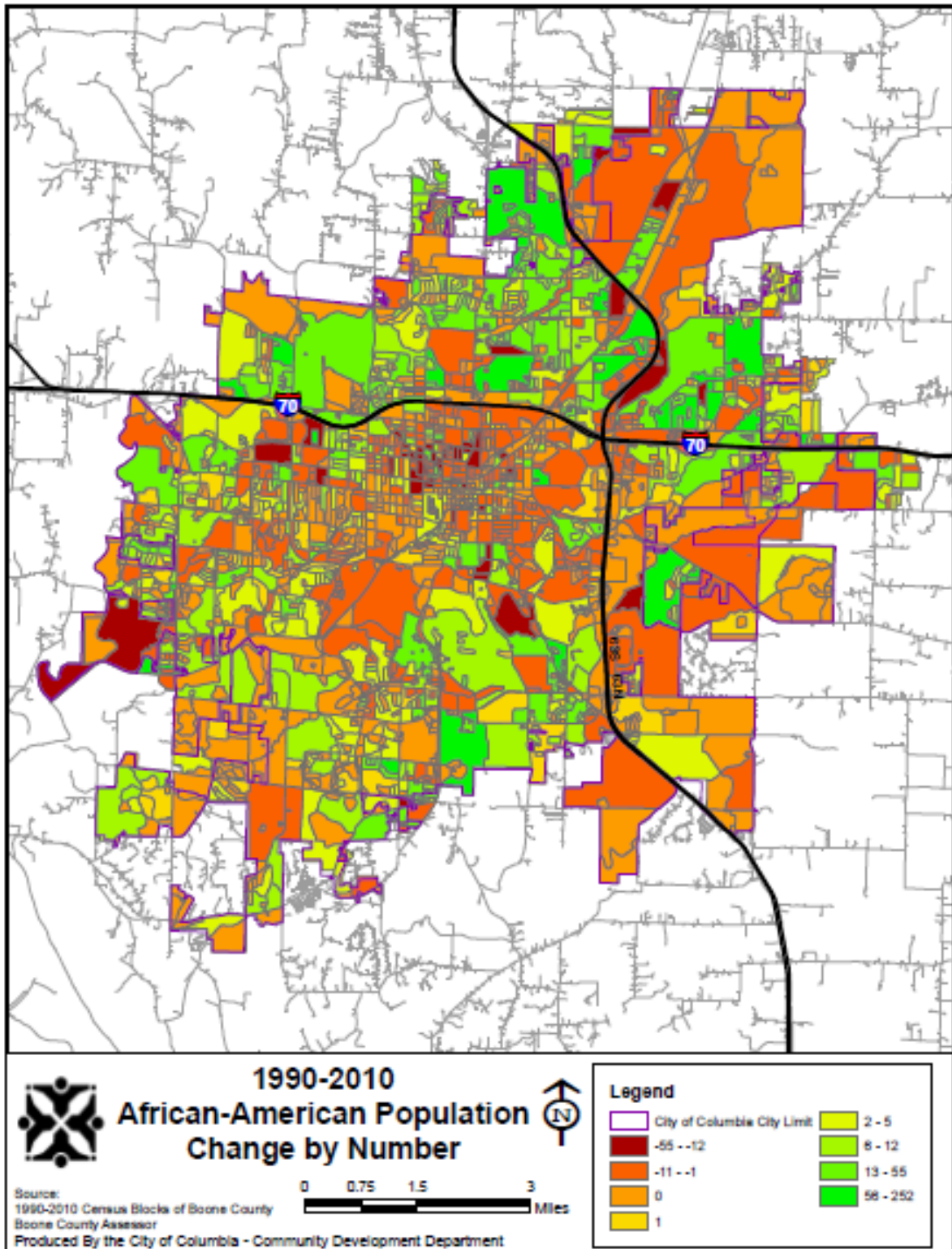


Figure 8 1990-2010 African-American Population Change by Number

Hispanic Population Data

CD staff reviewed Hispanic population densities and historical data for Columbia in order to determine trends. Staff reviewed the historical number of Hispanic persons by census block, current number of Hispanic persons by census block, as well as the percent change in Hispanic populations by census tract from 1990 to 2010.

Trends and Initial Findings

The following GIS maps demonstrate demographic shifts in the Hispanic population from 1990 to 2010:

- Figure 9: 1990 Columbia Census Hispanic Population by Block
- Figure 10: 2010 Columbia Census Hispanic Population by Block
- Figure 11: 1990-2010 Hispanic Population Change by Number

Figures 9 and 10 indicate higher Hispanic populations in the Central City area in 1990 than in 2010. Figure 11 also identifies this change in population and demonstrates that Hispanic populations are moving from the central city area and relocating on the city's periphery. Hispanic population movements out of the central city area are evenly distributed about the city periphery.

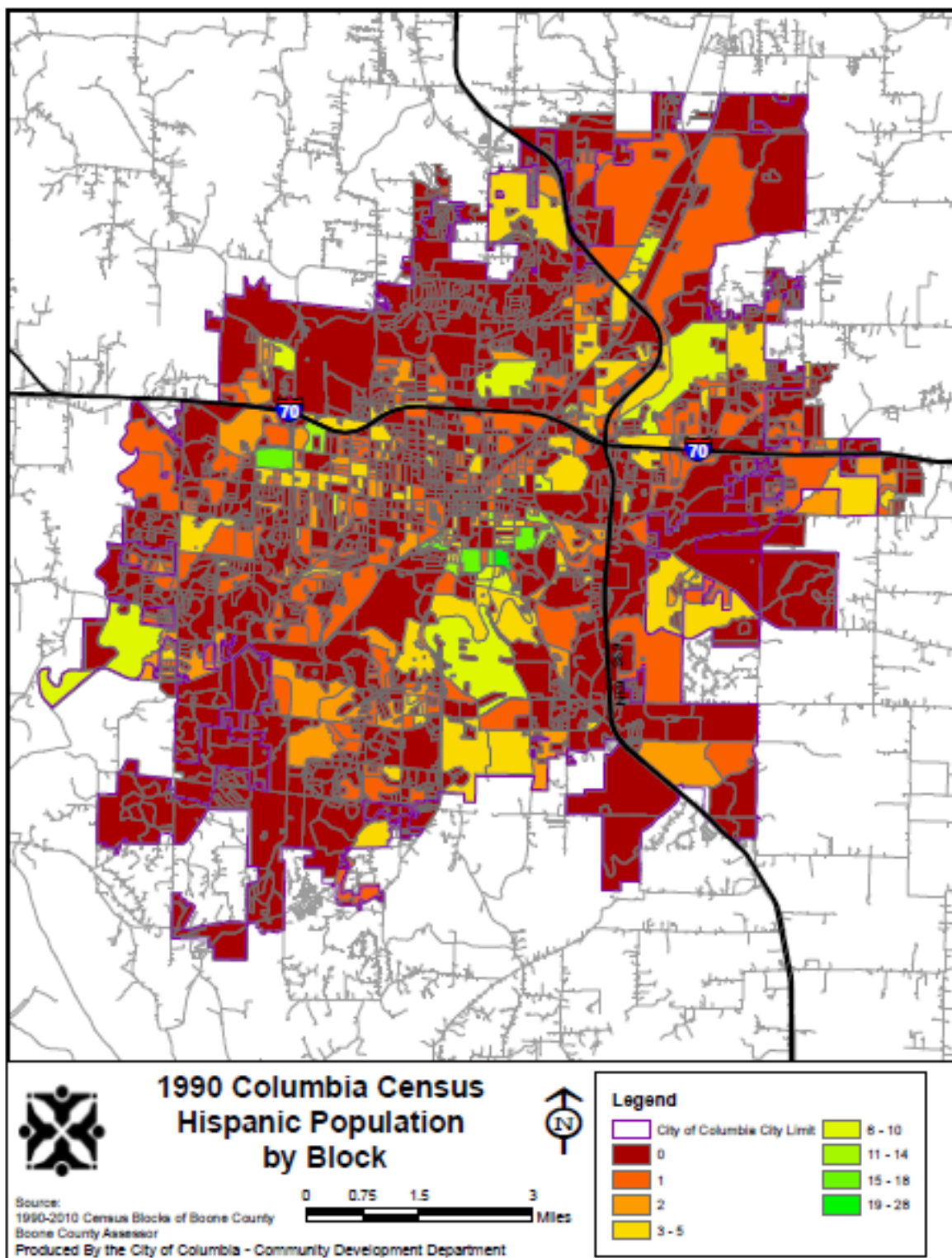


Figure 9 1990 Columbia Census: Hispanic Population by Block

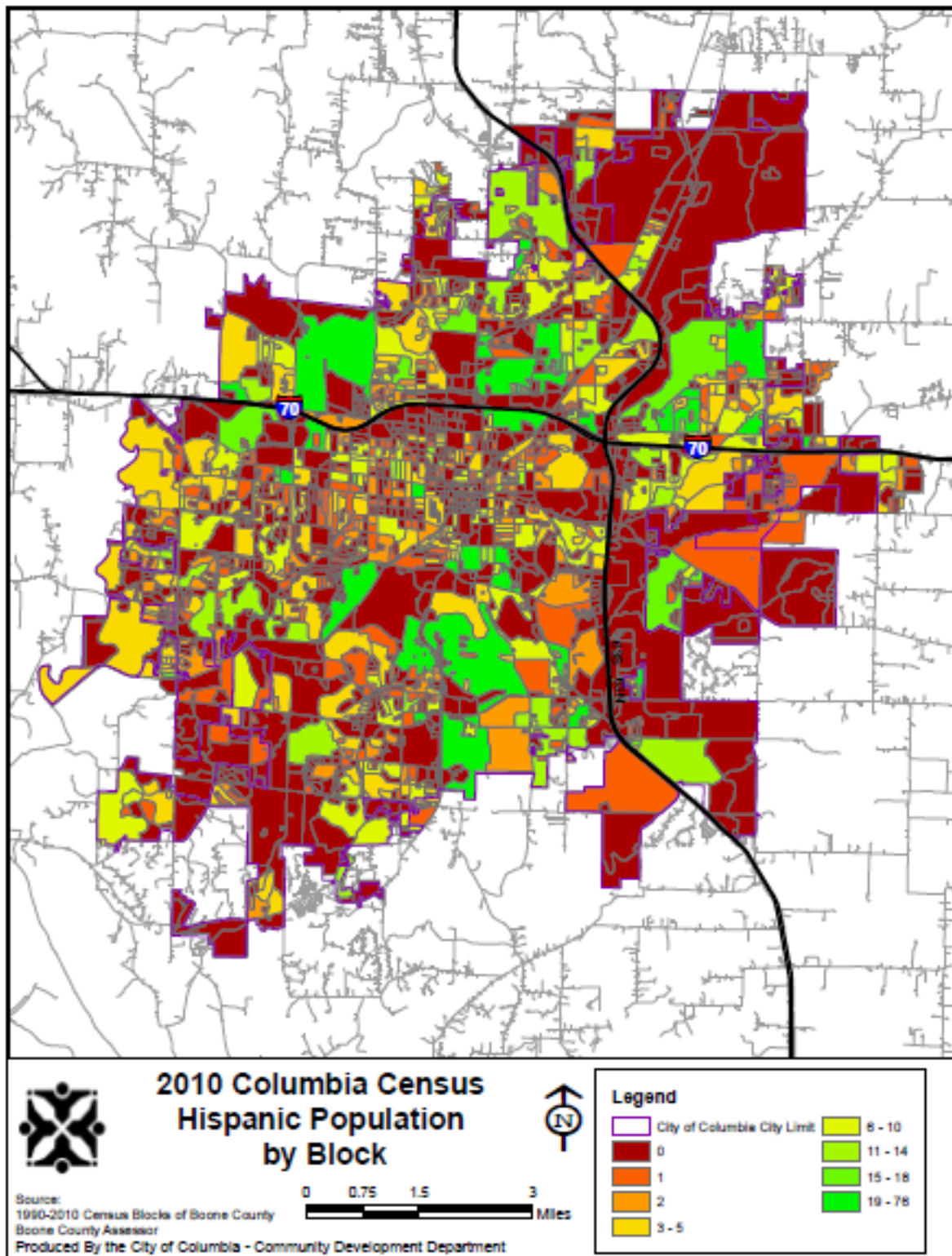


Figure 10 2010 Columbia Census: Hispanic Population by Block

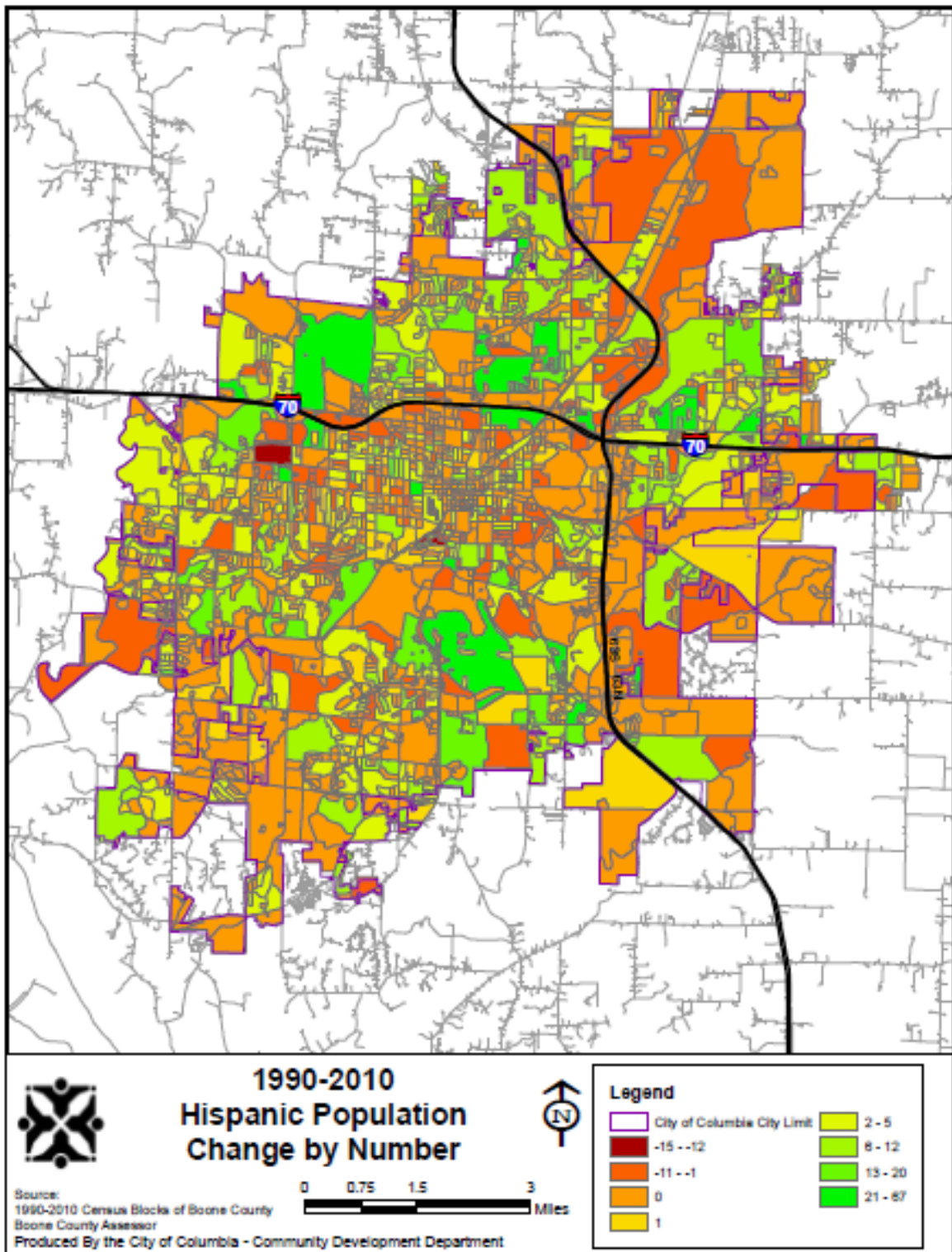


Figure 11 1990-2010 Hispanic Population Change by Number

Asian Population Data

CD staff reviewed Asian population densities and historical data for Columbia in order to determine trends. Staff reviewed the historical number of Asian persons by census block, current number of Asian persons by census tracts, as well as the percent change in Asian populations by census block from 1990 to 2010.

Asian Population Trends and Initial Findings

The following GIS maps demonstrate demographic shifts in the Asian population from 1990 to 2010:

- Figure 12: 1990 Columbia Census Asian Population by Block
- Figure 13: 2010 Columbia Census Asian Population by Block
- Figure 14: 1990-2010 Asian Population Change by Number

Figures 12 and 13 demonstrate higher Asian populations in the central city area in 1990 than in 2010. Figure 13 indicates Asian population densities increased more in the southwest portions of Columbia. Figure 14 also identifies this change in population and demonstrates that Asian populations have moved from the central city area and relocated on the city's periphery. Asian population movements out of the central city area are more weighted to southwest Columbia than to other parts of the periphery.

Summary of Minority Population Trends and Initial Findings

Initial minority population demographic information demonstrates minority populations are decreasing in the central city area and increasing on the periphery of Columbia. This may be due to higher-quality housing options available outside of the central City area. Further analysis of crime, schools and neighborhood amenities is needed to describe this demographic trend. CD staff should also review demographic trends of non-minority citizens to see if this is an overall trend in people leaving the central city area.

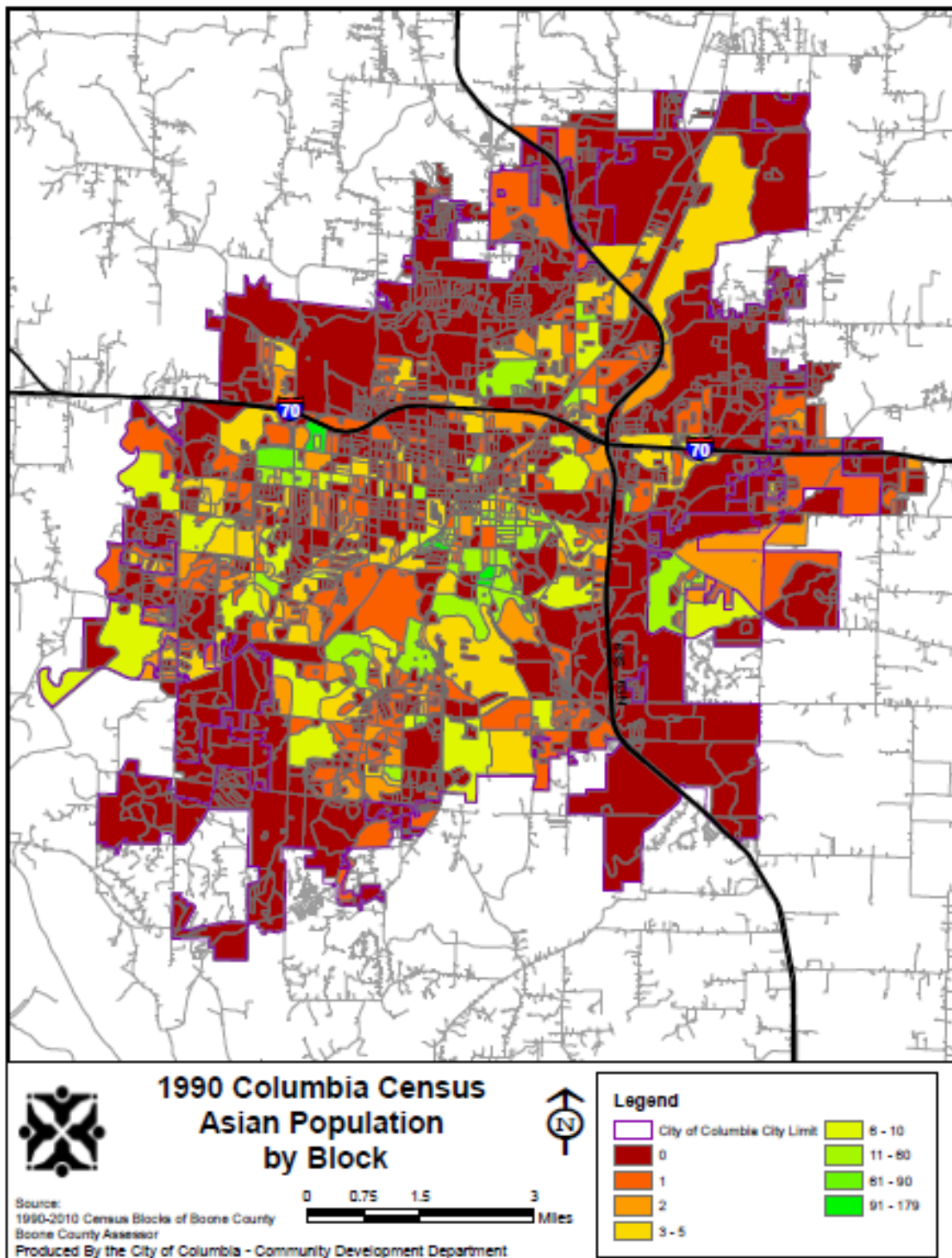


Figure 12 1990 Columbia Census: Asian Population by Block

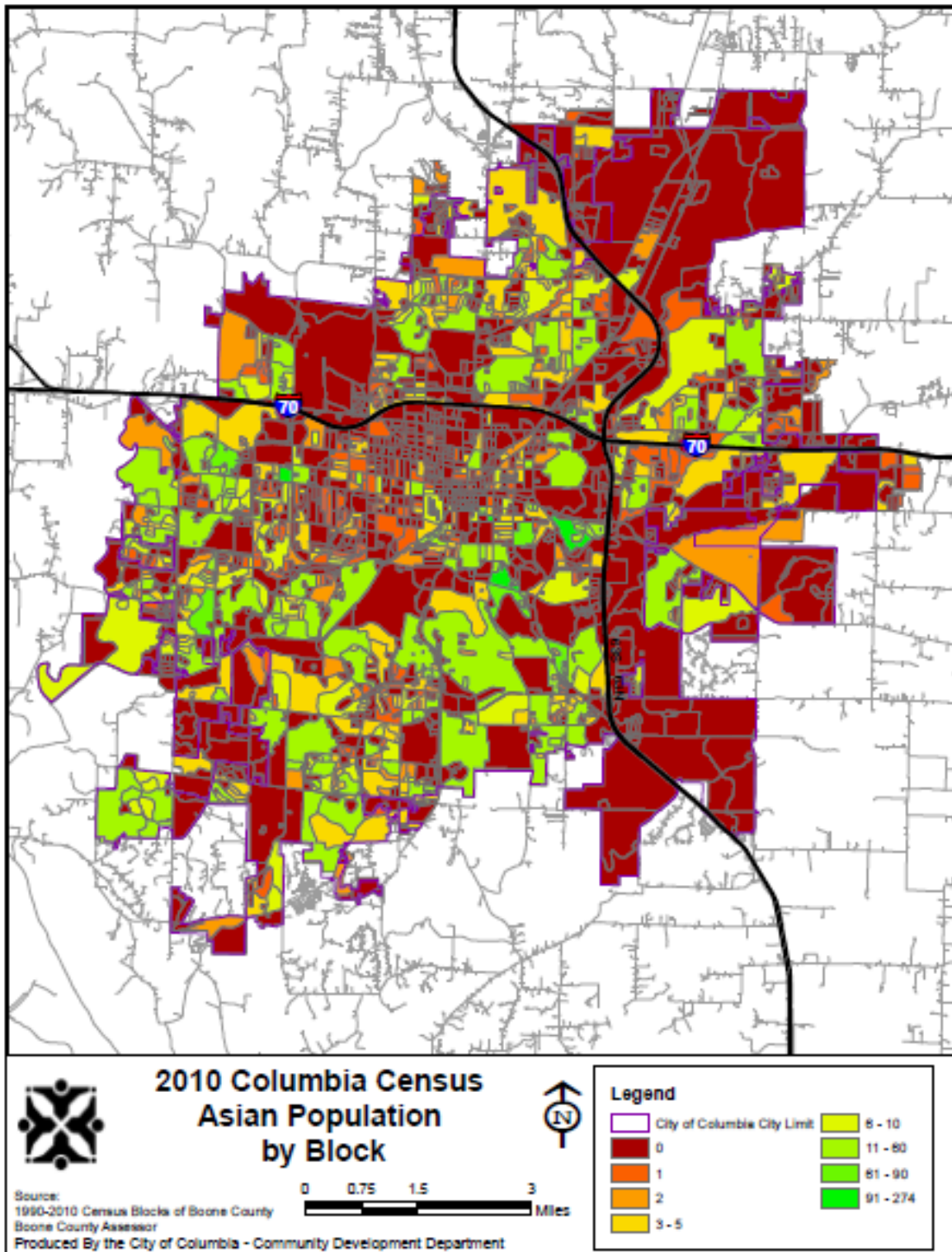


Figure 13 2010 Columbia Census: Asian Population by Block

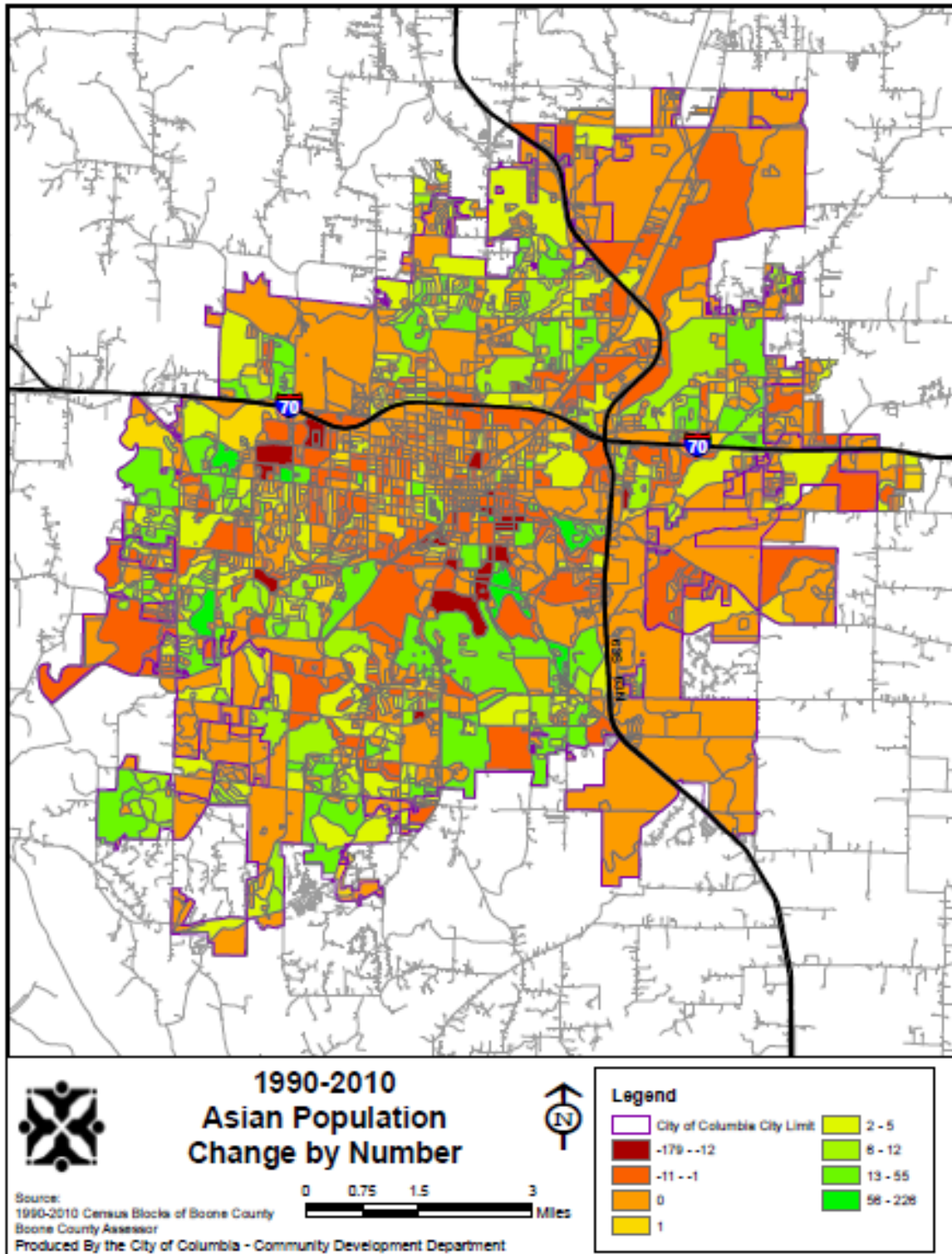


Figure 14 1990-2010 Asian Population Change by Number

Families with Children

The percentage of Columbia households with children under 18 years of age has increased from 19% in 2008 to 25% in 2010. The percentage of families with children under 18 headed by a female decreased slightly to 26% of families. Figure 15 show the breakdown of three different household types with children under 18, according to 2010 American Community Survey data.

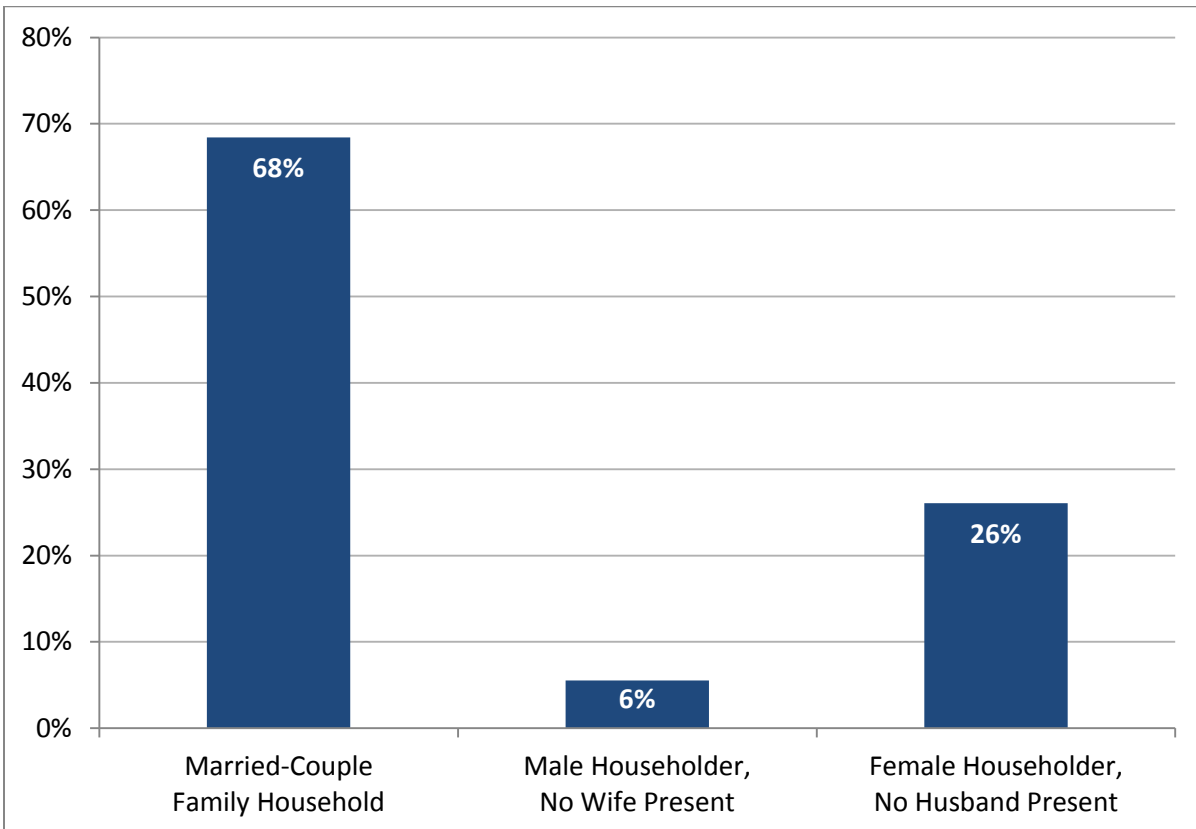


Figure 15 Percent of Columbia Families with Children under 18 by Household Type

Age

The population of persons 65 or older is 9,203 according to 2010 census data, which is a 26% increase from 7,280 persons according to 2000 census data. Persons aged 20-39 years of age make up the largest portion of Columbia's population according to 2010 census data. Figure 16 displays the Percent of Columbia's population by age.

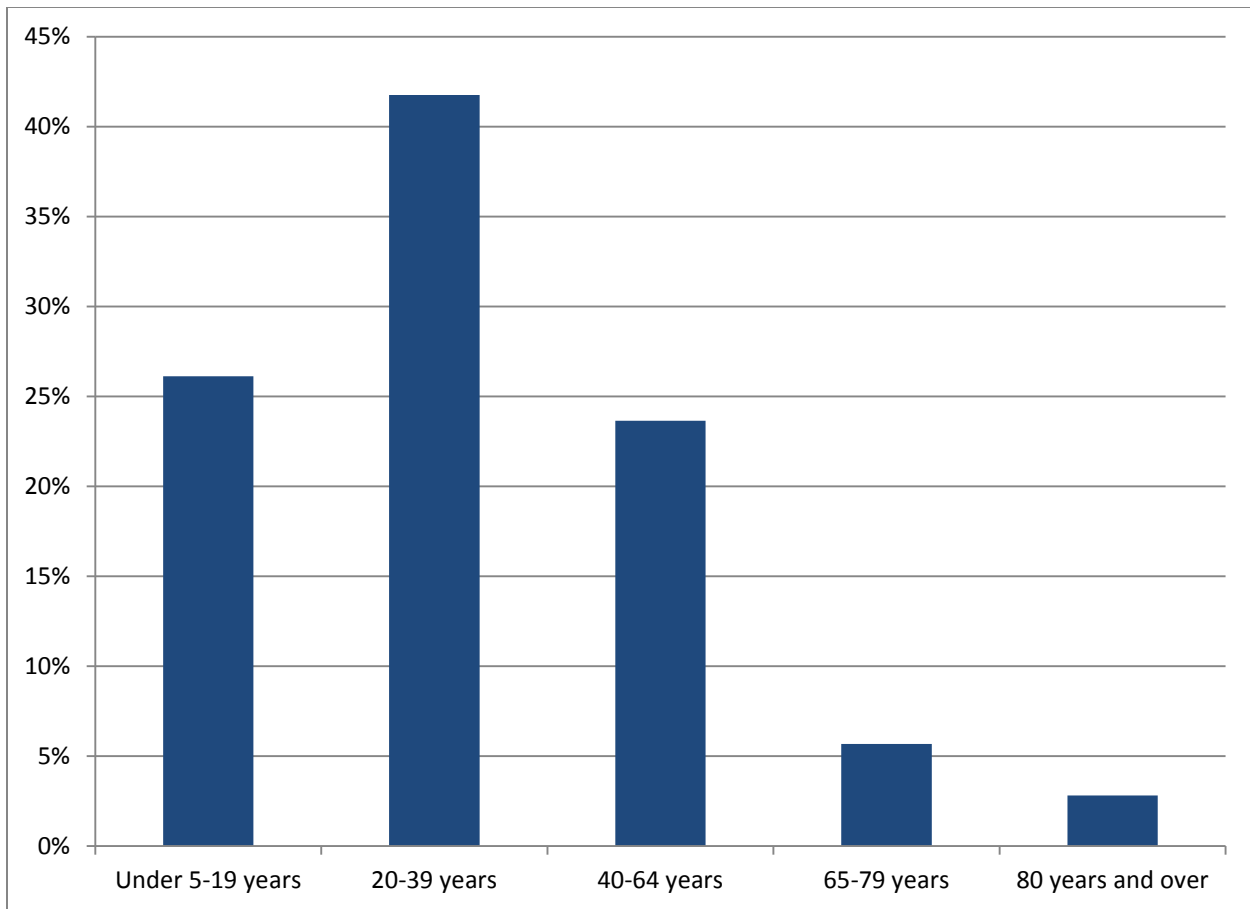


Figure 16 Percent of Columbia's Population by Age

Disability Status

Figures 17, 18 and 19 display the density of populations with a disability in the City of Columbia. The maps show each age grouping of persons with a disability distributed throughout the city and are less densely populated in the central city area.

CD staff has polled several local agencies that serve persons with a disability regarding an inventory of “accessible” housing in Columbia. There was a consensus that no data existed describing the total number of “accessible” housing units and the number of households with persons with disabilities. This basic data would be useful in defining the accessible housing needs in Columbia. The previous AI mentioned several low-income housing tax credit (LIHTC) developments and housing developments with accessible units; however “accessible” housing was not defined and the number of accessible housing units was also not specified.

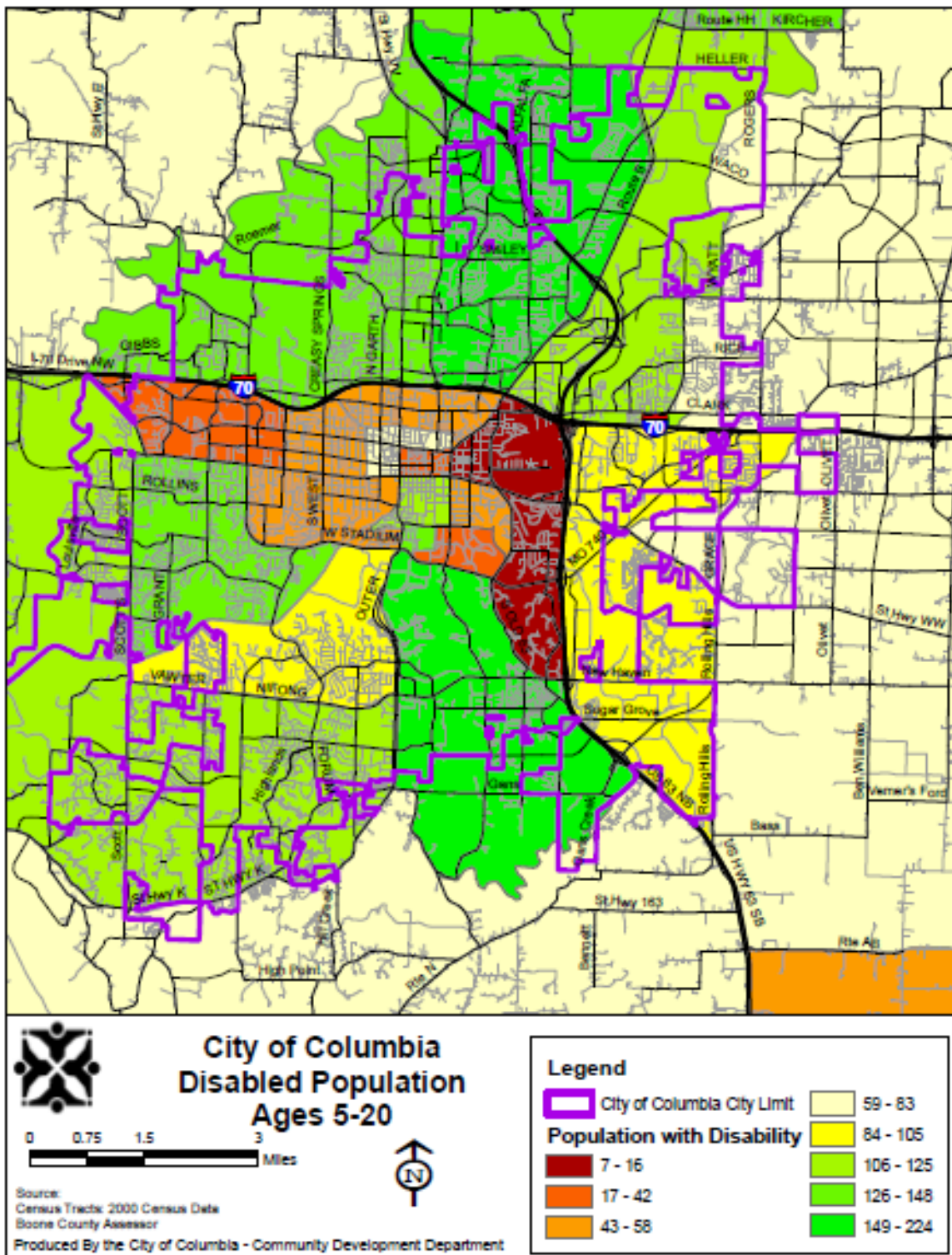


Figure 17 City of Columbia Persons with a Disability Ages 5-20

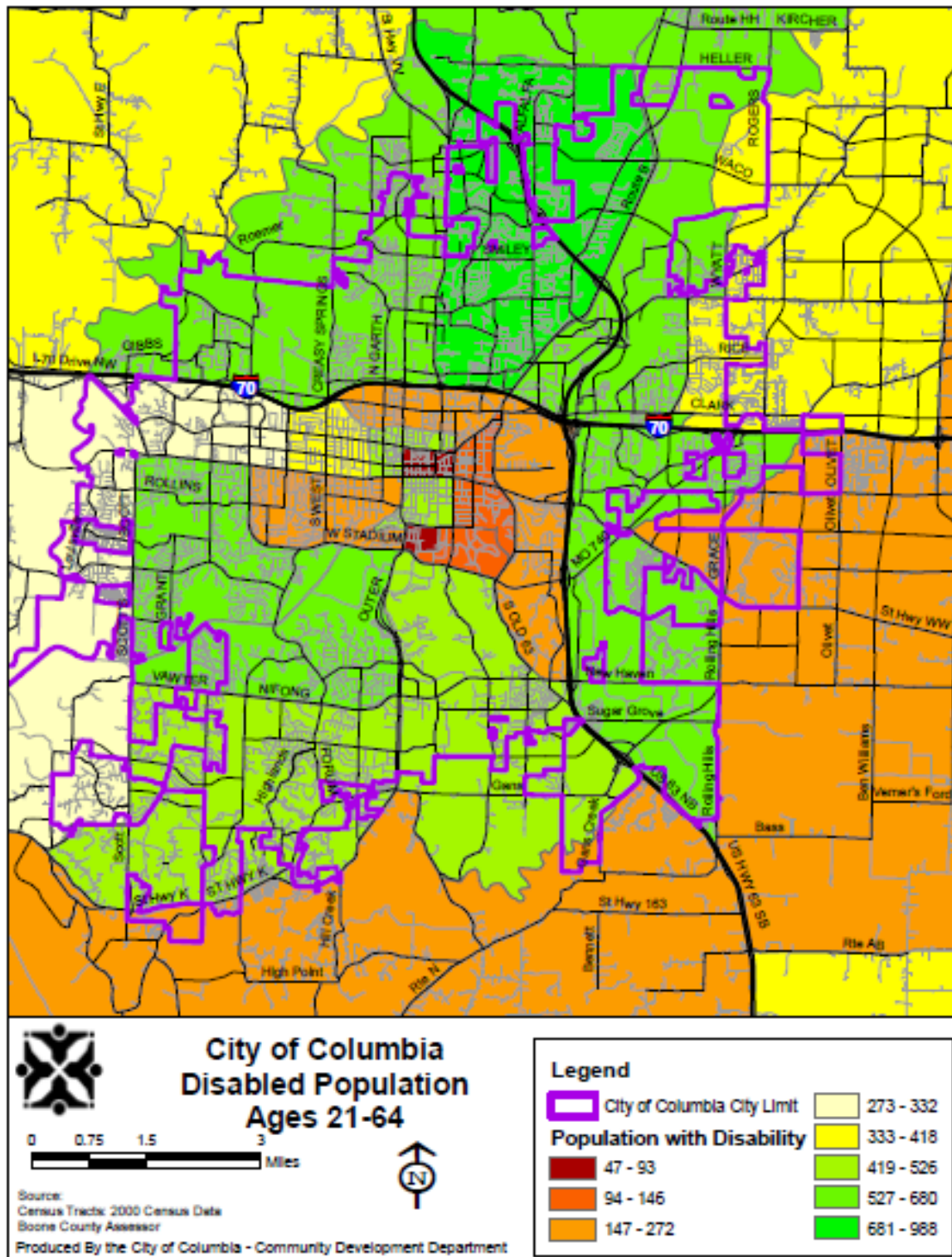


Figure 18: City of Columbia Persons with a Disability Ages 21-64

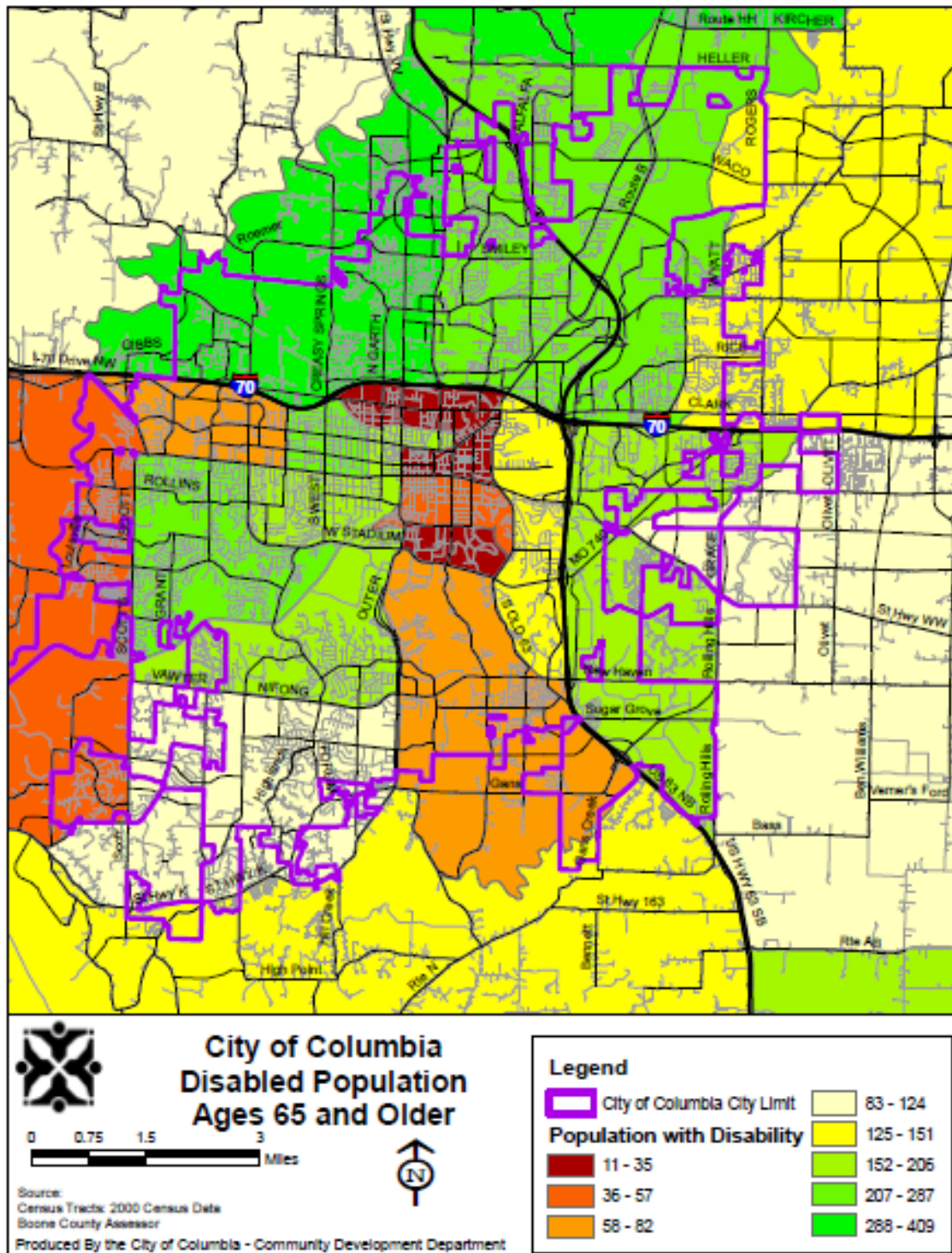


Figure 19: City of Columbia Persons with a Disability Ages 65 and Older

3. Neighborhood Amenities

Employment Opportunities

Figure 20 indicates the majority of Columbia's job opportunities are in the Education and Health Care Services, followed by Arts, Entertainment, Accommodations and Retail Trade.

City of Columbia Number of Jobs and Workers					
Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	134	59	0	0	0
Arts, Entertainment, Accommodations	4,738	8,469	16	17	1
Construction	1,067	1,968	4	4	0
Education and Health Care Services	5,710	10,401	20	21	1
Finance, Insurance, and Real Estate	2,535	4,957	9	10	1
Information	721	1,108	2	2	0
Manufacturing	1,455	1,955	5	4	-1
Other Services	1,245	2,228	4	5	0
Professional, Scientific, Management Services	2,751	5,155	9	10	1
Public Administration	106	37	0	0	0
Retail Trade	4,913	8,436	17	17	0
Transportation and Warehousing	783	854	3	2	-1
Wholesale Trade	1,229	1,600	4	3	-1
Total	27,387	47,227	--	--	--

Figure 20: City of Columbia Number of Jobs and Workers

Unemployment

In August 2013, Columbia's unemployment rate was 5.1%, down from August 2012. Unemployment rates historically impact minorities, specifically African Americans and Hispanics, more adversely than non-minorities in Columbia, and nationwide. Figure 21 shows the average unemployment rate for the US and Missouri according to race/ethnicity.

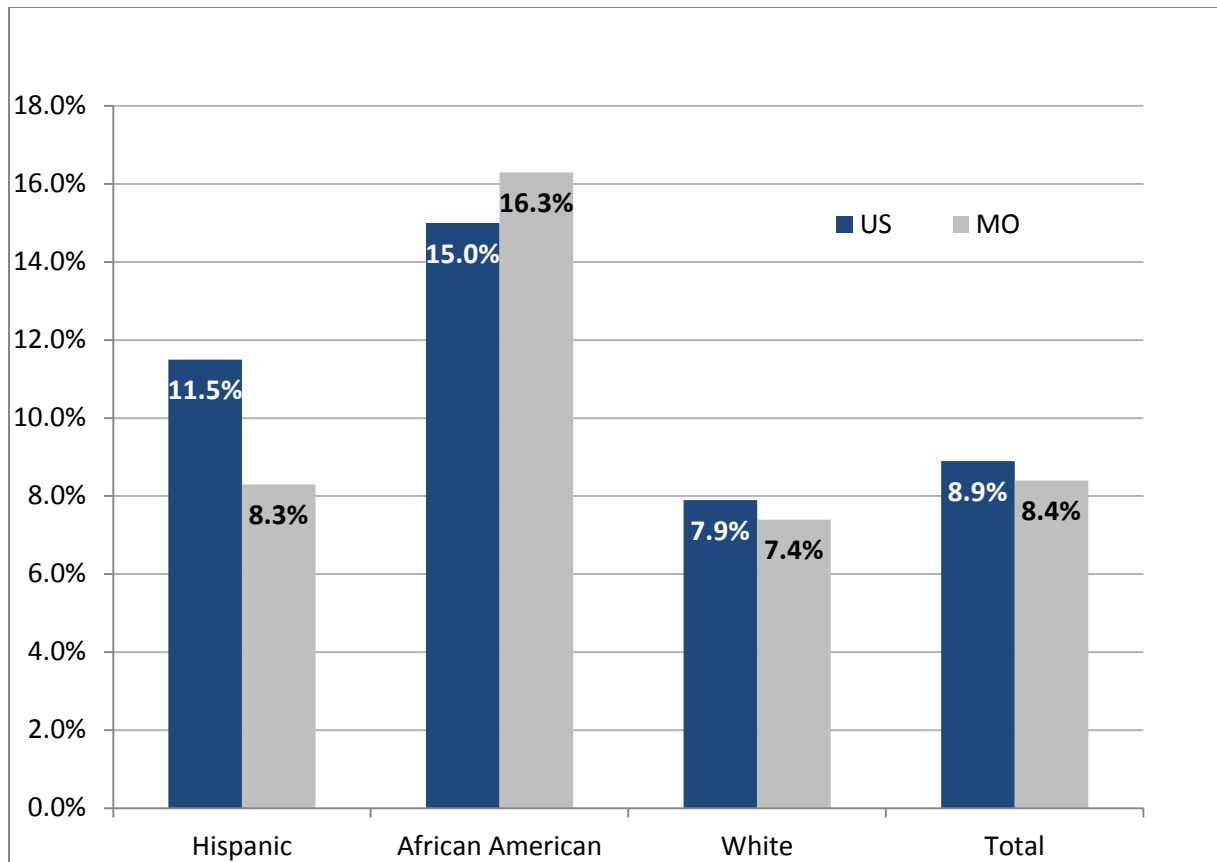


Figure 21: 2011 Average Unemployment Rate by Race/Ethnicity

Geographic Access to Employment

Data indicates correlation between race and unemployment; however no impediments were identified based on the location of employment centers and minority or low to moderate income populations. Figure 22 shows the distribution of population by income, while also identifying major employment centers. Although no impediments were identified, the City will utilize this data to inform future affordable housing development sites to ensure access to employment opportunities.

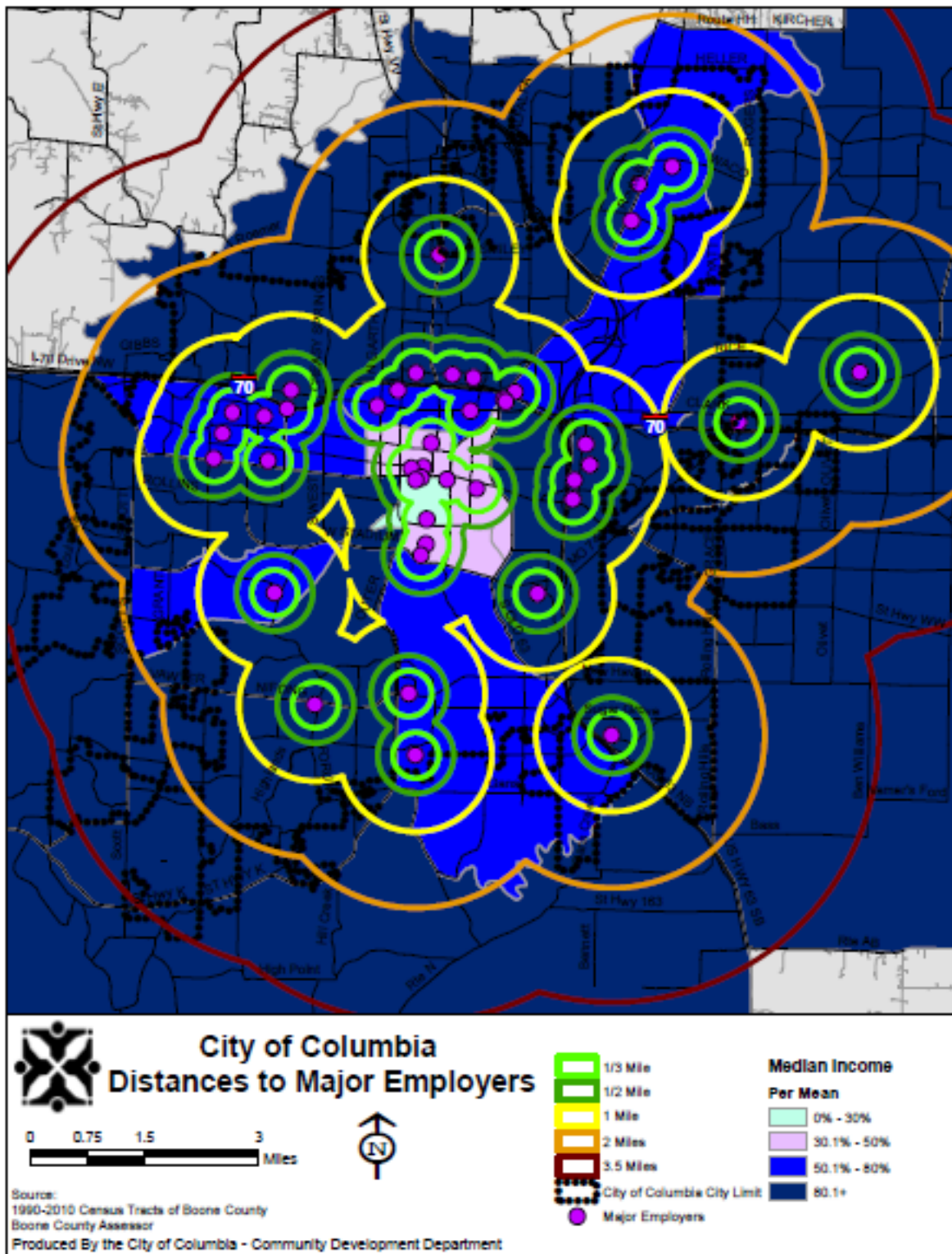


Figure 22: City of Columbia Distances to Major Employers

Transportation

Lower income persons are more likely to use public transportation for commuting to work, school, grocery stores, obtain services, and retail centers. Current data shows a significant correlation between African American populations and lower income populations. The 2010 Columbia Census African American Population by Block map indicates higher African American population densities in the Central, north and northeast areas of Columbia.

Bus Routes

Figure 23 displays proposed bus routes to be implemented in 2014. The proposed routes provide good access to all areas of the City with low to moderate income populations with some access limitations in the outlying northeast and southeast areas. There is good access to bus routes in the lower income residential areas near downtown, including public housing developments. There is also good bus service to employment and retail areas throughout the City.

The City serves people with disabilities through Para-transit, which serves qualifying individuals within a ¾ mile area of existing bus routes, but does not have the means to serve people with disabilities outside of this area.

Sidewalks

The City of Columbia typically spends a significant portion of CDBG funds annually on sidewalk accessibility projects. Most sidewalk projects take place in the City's "CDBG Eligible" area, which includes census blocks with 51% of the households being at 80% or below the area median income level. Many of the projects also fall within the Neighborhood Response Team (NRT) Area, which represents a smaller target area that receives additional property maintenance code enforcement services as well as funding for the CDBG demolition program. There are opportunities for the improvement of sidewalks in the CDBG eligible area, as well as the NRT area.

Figures 24 and 25 indicate additional sidewalk infrastructure improvement opportunities in the northeast and southeast outlying area. They also demonstrate areas of good sidewalk access in lower income neighborhoods within close proximity to the downtown area.

Bike System

Figure 26 displays City bicycle routes. The City has completed several bicycle and pedestrian improvements through grant funding and City general revenue. There are many bicycle route options throughout most of Columbia. The bicycle map indicates some limited access in the outlying northeast and southeast CDBG eligible areas.

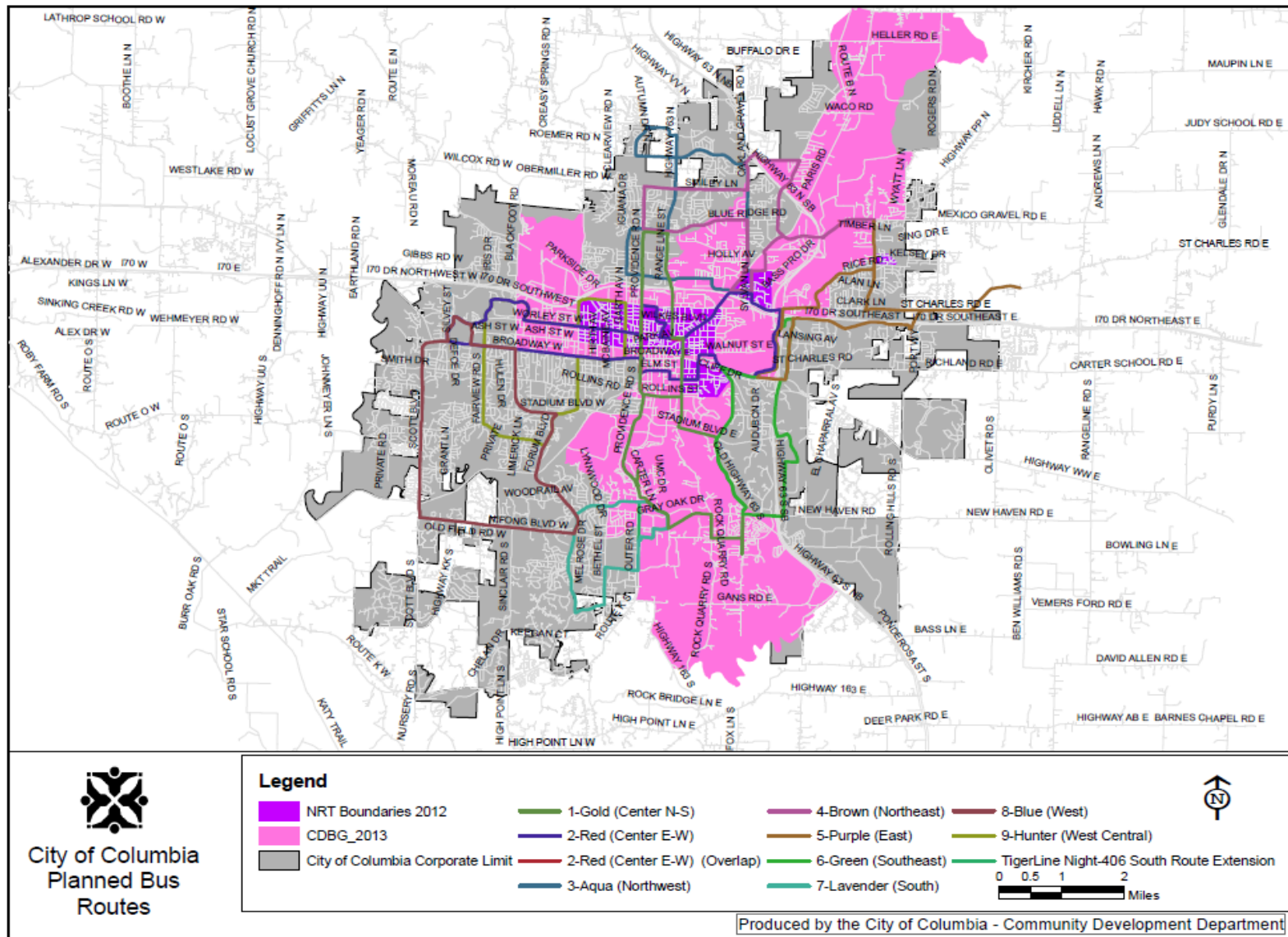


Figure 23: City of Columbia Planned Bus Routes

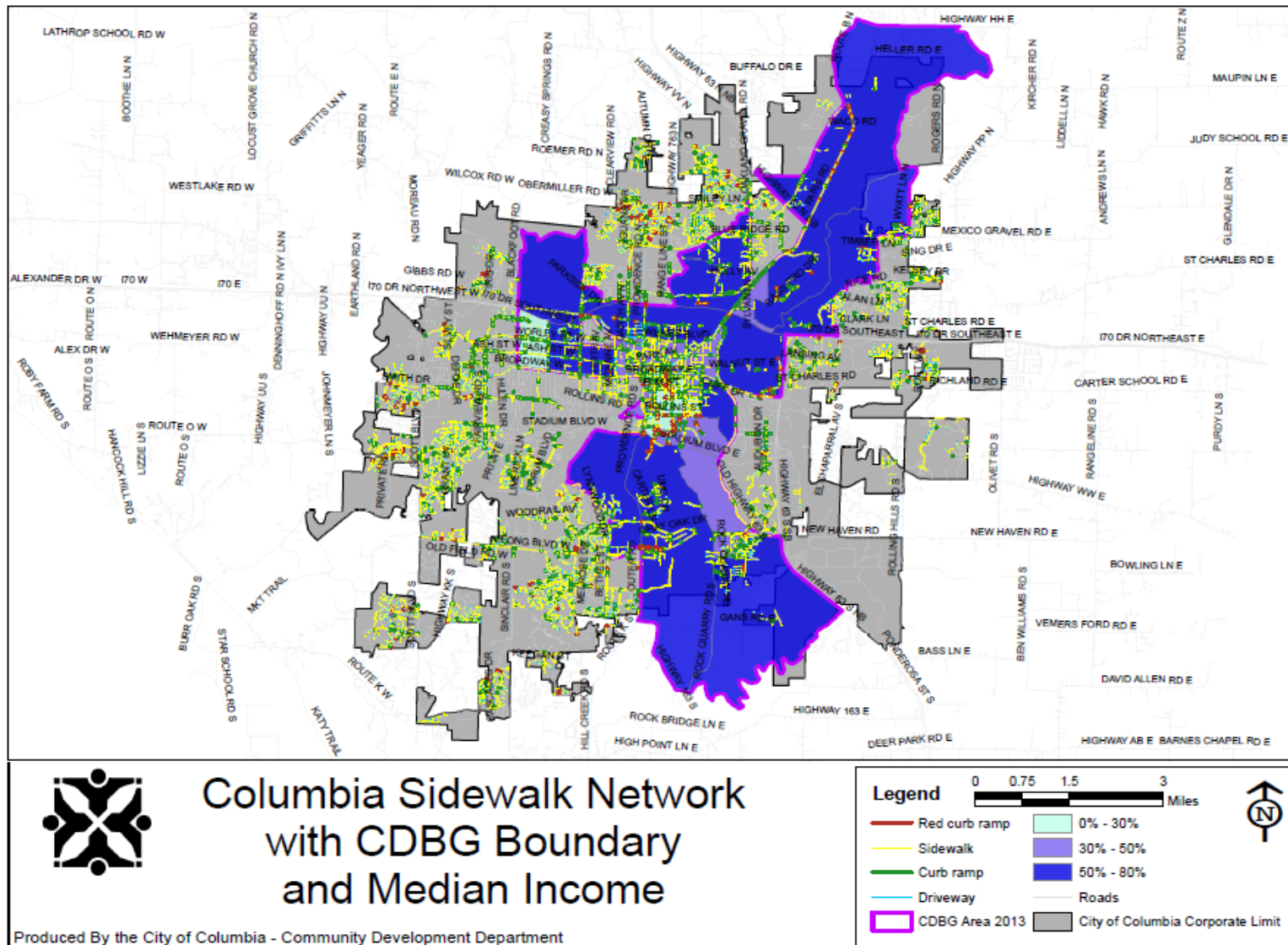


Figure 24: Columbia Sidewalk Network with CDBG Boundary and Median Income

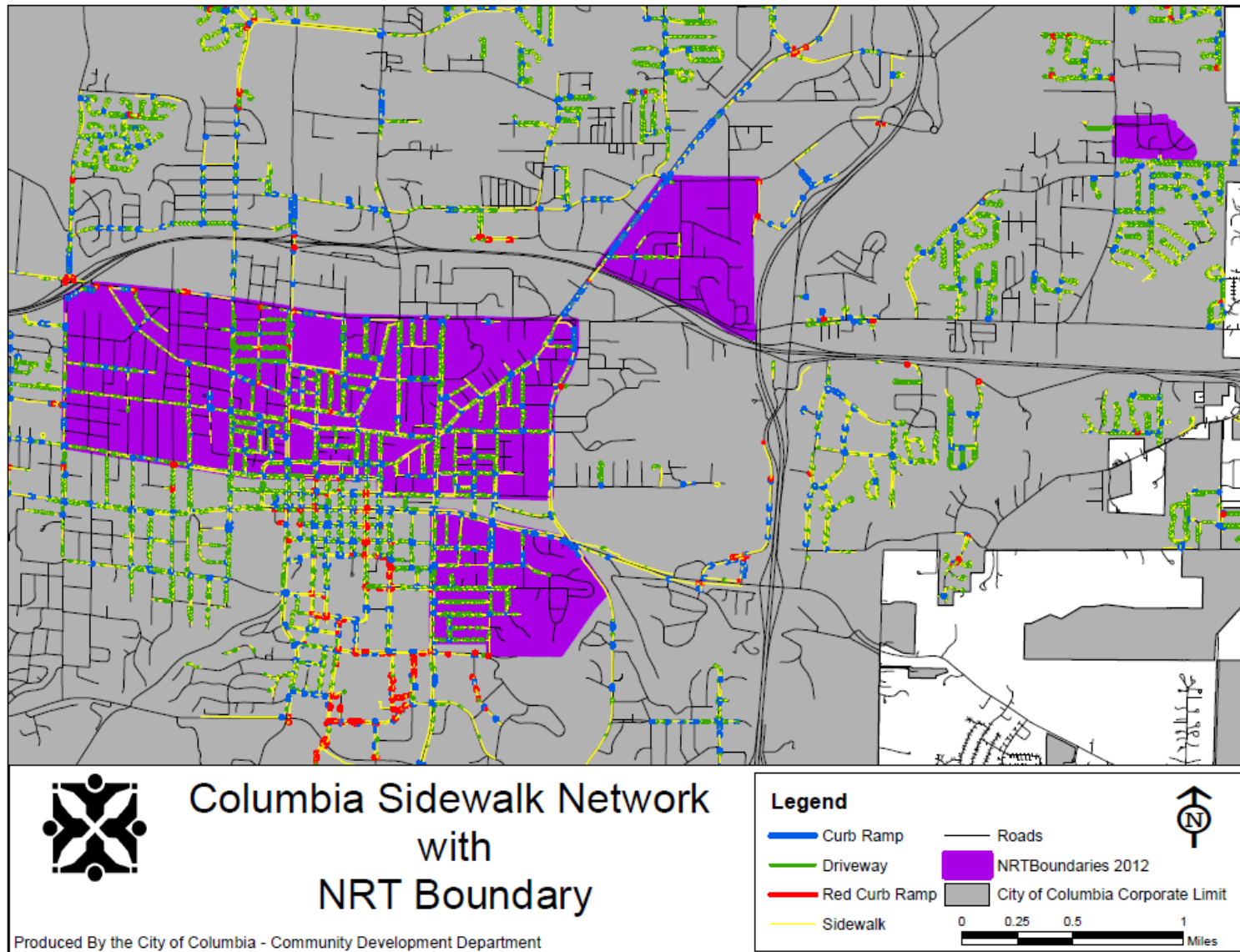


Figure 25: Columbia Sidewalk Network with NRT Boundary

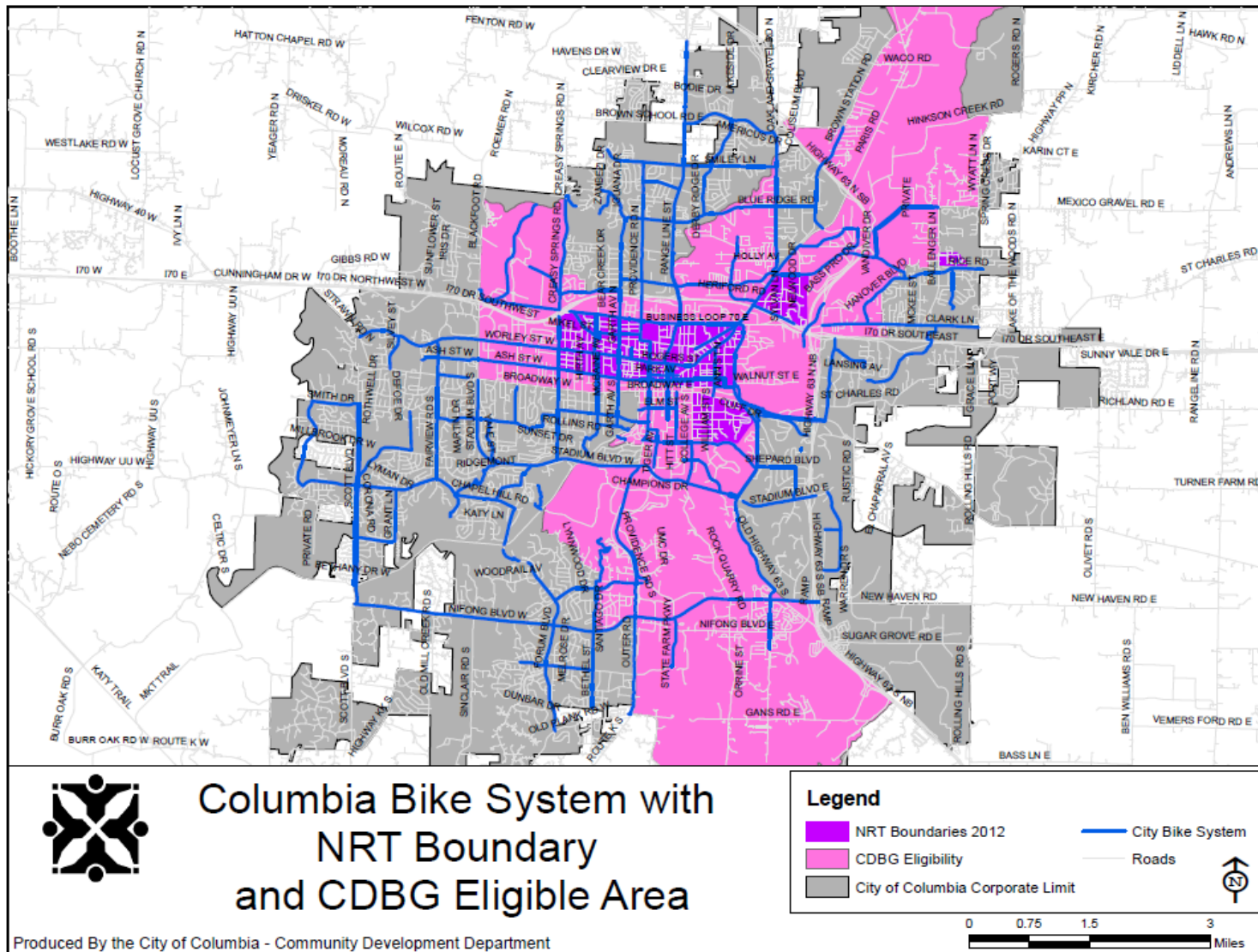


Figure 26: Columbia Bike System with NRT Boundary and CDBG Eligible Area

Grocery Stores

Access to grocery stores was reviewed as a part of the City's AI. The review resulted in the identification of limited access to grocery stores in 3 main areas of the City. Figure 27 demonstrates areas in southeast, north central and northeast Columbia are located greater than 1 mile from a grocery store. Most public housing developments are within close proximity or less than 1 mile to a grocery store; however, Elleta Boulevard public housing units are located greater than 1 mile from a grocery store.

The central City area appears to be in reasonably close proximity to grocery stores and essential services. As seen in previous maps, minority populations are moving to outer proximity areas of the City, particularly northern and northeast areas. The City should monitor these observations and the impact on locating new HUD funded affordable housing developments.

Vacant Lots

Vacant residential lots located in the NRT area were reviewed as a part of the City's AI. Vacant lots represent opportunities for redevelopment; however, many remain undeveloped due to market forces and weakening neighborhoods. Several vacant lots in the NRT area represent City efforts to remove dangerous and dilapidated structures through the demolition program, as well as the administrative hearing process.

The City of Columbia has operated a demolition program within the NRT area since 2002 and utilized approximately \$310,500 to date to remove dangerous and dilapidated structures. 41 dilapidated houses have been removed with these funds. New housing has been constructed on 25 of these lots. The Demolition Program helps stabilize neighborhoods by removing dangerous structures and providing an incentive for redeveloping property for affordable housing.

The City also focuses code enforcement efforts within the NRT area and sometimes results in the demolition of dilapidated homes through an administrative process. There are approximately 3,200 houses in the Neighborhood Response Team area, housing an estimated 6,400 persons. Vacant lots represent unutilized resources for affordable housing development in the central City area. Figure 28 and 29 display the location of vacant lots in the NRT area.

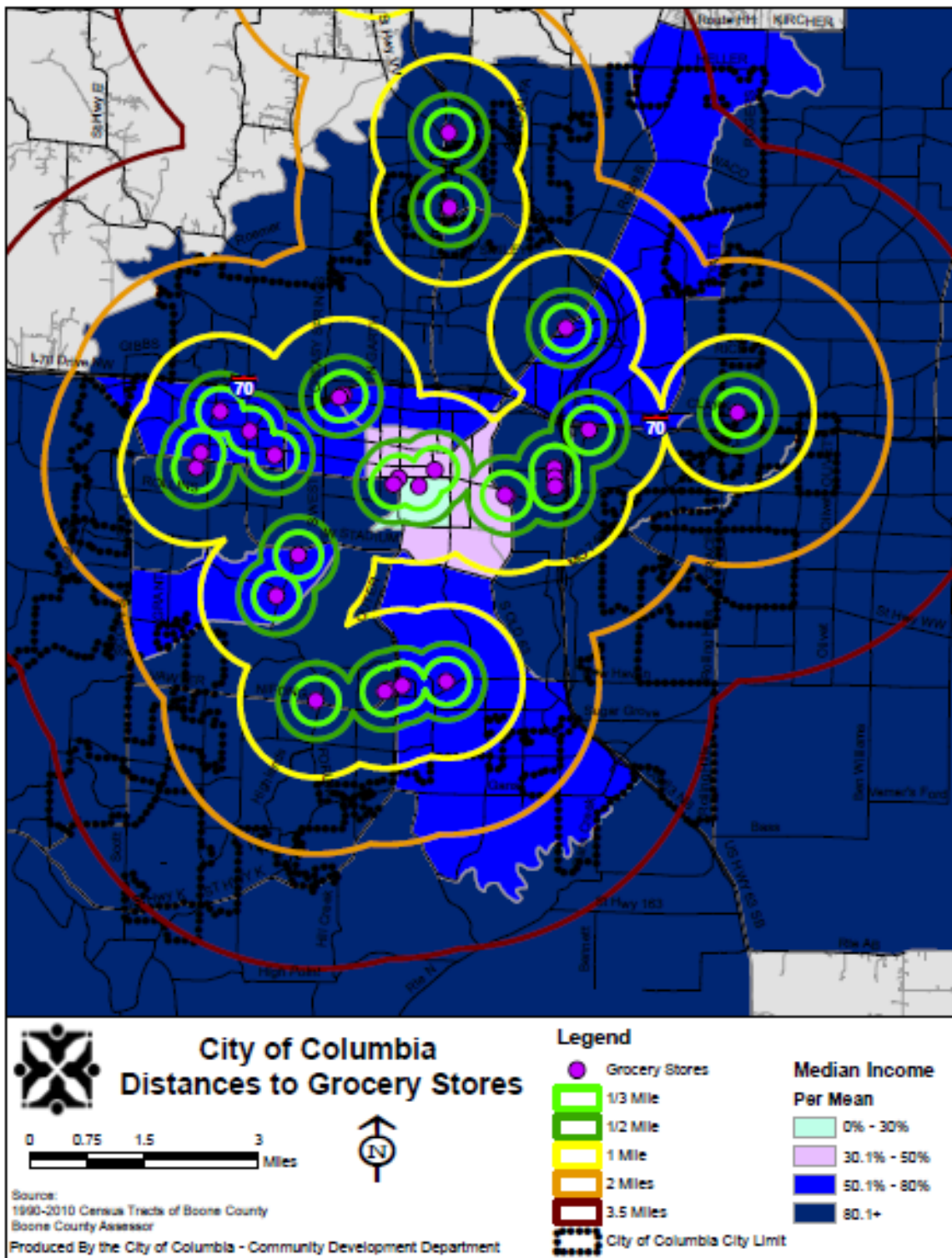


Figure 27: City of Columbia Distances to Grocery Stores

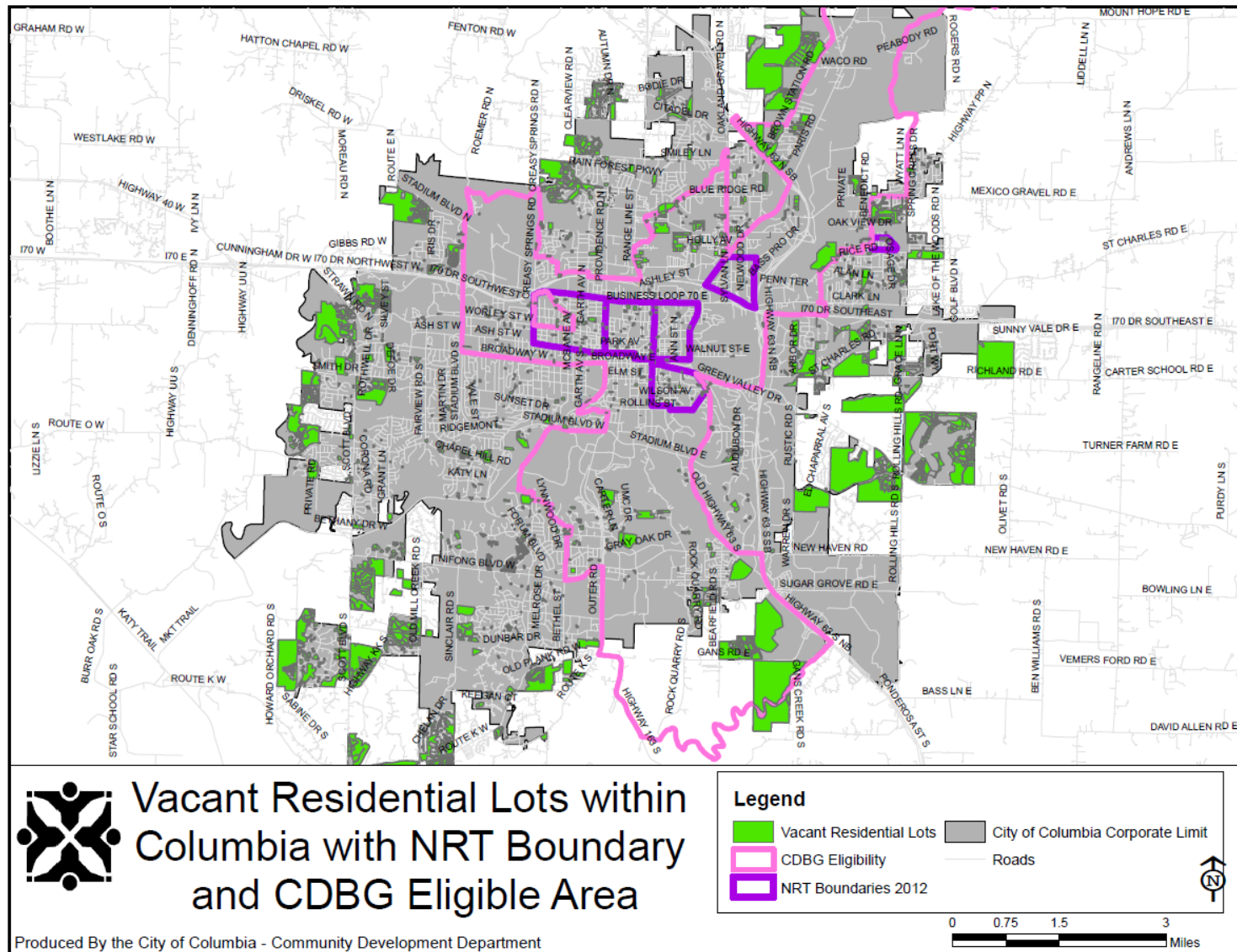


Figure 28: Vacant Residential Lots within Columbia with NRT Boundary and CDBG Eligible Area

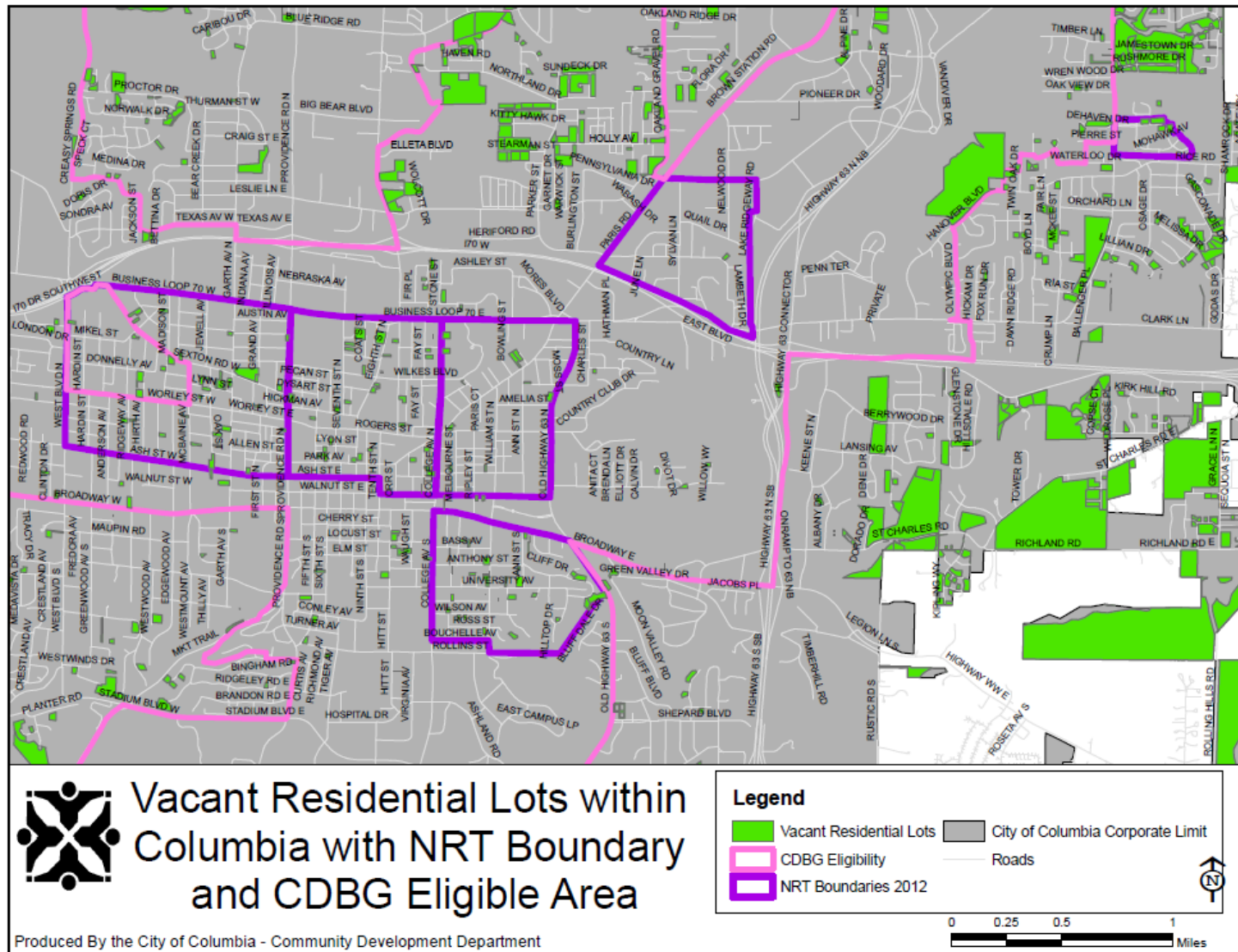


Figure 29: Vacant Residential Lots within Columbia with NRT Boundary and CDBG Eligible Area

4. Discrimination

Lending

Mortgage Data

Figures 30-37 display mortgage data for the Columbia Metropolitan Statistical Area (MSA). The data is 2012 Federal Financial Institutions Examination Council Home Mortgage Disclosure Act data. The data displays loan information by race, gender and income levels.

Conventional Home Loan Purchases By Race, 2012						
Race	Applications Received	Loans Originated	Applications Approved, Not Accepted	Applications Denied	Applications Withdrawn	Files Closed for Incompleteness
American Indian/Alaska Native	2	0	1	1	0	0
Asian	55	40	3	4	8	0
Black or African American	27	14	2	11	0	0
Native Hawaiian/Other Pacific Island	3	3	0	0	0	0
White	1458	1191	46	136	80	5
2 or More Minority Races Total	0	0	0	0	0	0
Joint (White/Minority Race)	29	20	1	6	2	0
Race Not Available	349	264	19	35	24	7
Total	1923	1532	72	193	114	12

Figure 30: City of Columbia Conventional Home Loan Purchases by Race, 2012

Conventional Home Loan Purchases By Ethnicity, 2012						
Ethnicity	Applications Received	Loans Originated	Applications Approved, Not Accepted	Applications Denied	Applications Withdrawn	Files Closed for Incompleteness
Hispanic or Latino	23	13	3	6	1	0
Not Hispanic or Latino	1514	1242	46	133	88	5
Joint (Hispanic/Latino & Not Hispanic/Latino)	12	8	0	2	2	7
Ethnicity Not Available	374	269	23	52	23	5
Total	1923	1532	72	193	114	17

Figure 31: City of Columbia Conventional Loan Purchases by Ethnicity, 2012

Conventional Home Loan Purchases By Minority Status, 2012						
Ethnicity	Applications Received	Loans Originated	Applications Approved, Not Accepted	Applications Denied	Applications Withdrawn	Files Closed for Incompleteness
White Non-Hispanic	1390	1159	39	111	76	5
Others, Including Hispanic	150	97	10	30	13	0
Total	1540	1256	49	141	89	5

Figure 32: City of Columbia Conventional Home Loan Purchases by Minority Status, 2012

Conventional Home Loan Purchases By Income, 2012						
Income	Applications Received	Loans Originated	Applications Approved, Not Accepted	Applications Denied	Applications Withdrawn	Files Closed for Incompleteness
Less than 50% AMI	237	132	14	80	10	1
50-79% AMI	362	275	17	52	15	3
80-99% AMI	202	168	6	13	15	0
100-119% AMI	195	164	7	13	8	3
120% AMI or more	748	651	26	31	36	4
Income Not Available	179	142	2	4	30	1
Total	1923	1532	72	193	114	12

Figure 33: City of Columbia Conventional Home Loan Purchases by Income, 2012

FHA, FSA/RHS and VA Home Loan Purchases By Race, 2012					
Race	Applications Received	Applications Denied	Applications Withdrawn	Files Closed for Incompleteness	Percent Applications Denied
American Indian/Alaska Native	3	0	1	0	0%
Asian	9	0	2	0	0%
Black or African American	31	4	4	0	13%
Native Hawaiian/Other Pacific Island	1	0	0	0	0%
White	764	52	56	6	7%
2 or More Minority Races Total	1	0	0	0	0%
Joint (White/Minority Race)	10	1	0	0	10%
Race Not Available	81	4	9	5	5%
Total	900	61	72	11	

Figure 34: City of Columbia FHA, FSA/RHS and VA Home Loan Purchases by Race, 2012

FHA, FSA/RHS and VA Home Loan Purchases By Ethnicity, 2012						
Ethnicity	Applications Received	Loans Originated	Applications Approved, Not Accepted	Applications Denied	Applications Withdrawn	Files Closed for Incompleteness
Hispanic or Latino	16	14	0	0	1	1
Not Hispanic or Latino	788	652	13	55	63	5
Joint (Hispanic or Latino/Not Hispanic or Latino)	9	7	0	2	0	0
Ethnicity Not Available	87	68	2	4	8	5
Total	900	741	15	61	72	11

Figure 35: City of Columbia FHA, FSA/RHS and VA Home Loan Purchases by Ethnicity, 2012

FHA, FSA/RHA and VA Home Loan Purchases By Minority Status, 2012						
Ethnicity	Applications Received	Loans Originated	Applications Approved, Not Accepted	Applications Denied	Applications Withdrawn	Files Closed for Incompleteness
White Non-Hispanic	737	613	13	50	56	5
Others, Including Hispanic	77	62	0	7	7	1
Total	814	675	13	57	63	6

Figure 36: City of Columbia FHA, FSA/RHA and VA Home Loan Purchases by Minority Status, 2012

FHA, FSA/RHS and VA Home Loan Purchases By Income, 2012						
Ethnicity	Applications Received	Loans Originated	Applications Approved, Not Accepted	Applications Denied	Applications Withdrawn	Files Closed for Incompleteness
Less than 50% AMI	138	102	3	19	11	3
50-79% AMI	292	256	1	16	17	2
80-99% AMI	175	152	4	5	12	2
100-119% AMI	99	86	3	5	4	1
120% AMI or more	176	140	4	15	15	2
Income Not Available	20	5	0	1	13	1
Total	900	741	15	61	72	11

Figure 37: City of Columbia FHA, FSA/RHS and VA Home Loan Purchases by Income, 2012

Summary of Mortgage Data Trends

Analysis of 2012 mortgage data for Columbia MSA indicates minority loan applicants are denied loans at a higher rate than non-minority persons. This trend is even more apparent in conventional loan applications vs. FHA, FSA/RHS, or VA loan applications. Data in figures 38 and 39 indicate lower income populations are denied at a higher rate when applying for conventional financing vs. FHA, FSA/RHS, or VA financing. Lower income applicants have higher loan denial rates in both categories likely due to difficulties meeting underwriting requirements. The data suggests underwriting requirements are more difficult to meet for conventional financing and suggests that minority loan applicants are more adversely impacted by income.

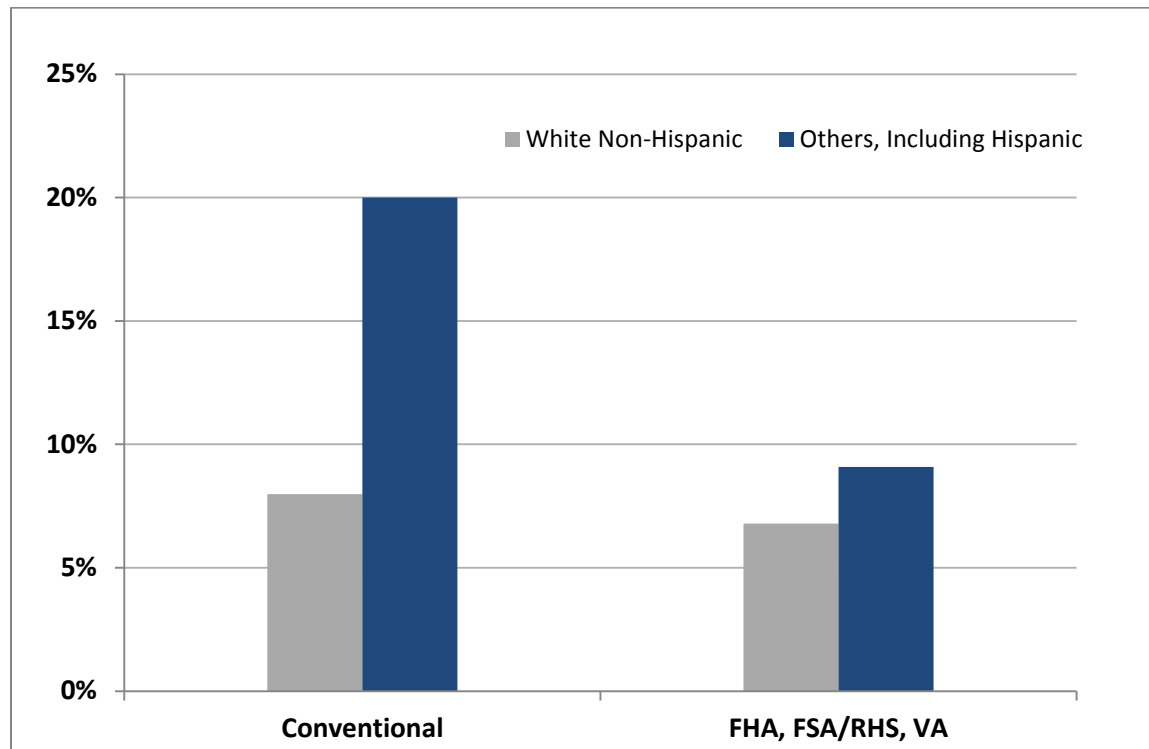


Figure 38: City of Columbia Percent of Loans Denied by Minority Status, Columbia MSA

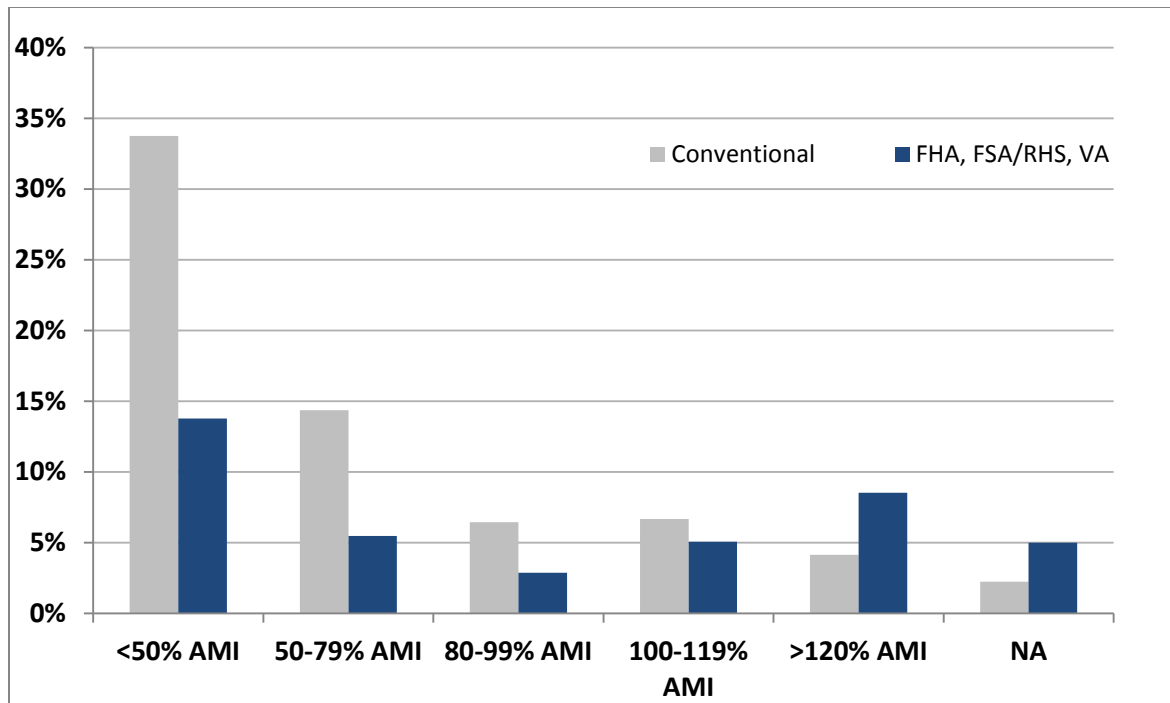


Figure 39: City of Columbia Percent of Loans Denied by Income Group, Columbia MSA

Rental Housing

The City of Columbia requires rental properties to be registered with the City and meet minimum property maintenance standards. Rental inspections are conducted by City inspectors. Approximately 9,665 buildings and 25,842 units are registered under the Rental Unit Conservation Law managed through the Office of Neighborhood Services. Properties are registered and inspected every three years and may renew for three years if there are no violations on the property.

In FY2012, the City conducted 1,555 rental inspections and 1,061 contained a violation identified by a City inspector. This data demonstrates the importance of City efforts in taking a proactive approach to maintaining rental units for tenants and potentially supports the need for landlord education identified by the fair housing focus group results.

Public Housing

The Columbia Housing Authority (CHA) was established in 1956 as a municipal corporation under the 1937 federal housing act and Chapter 99 of the Revised Statutes of the state of Missouri. A federal urban renewal grant provided money to replace dangerous and unsanitary residences in Columbia's central city with safe and clean dwellings at affordable rents for low-income persons. Columbia's four public housing developments were constructed between 1958 and 1973.

CHA currently operates 719 public housing units divided into four separate developments. The Downtown Family Site, located in Columbia's central city, contains 294 townhomes servicing families and households of all types. Oak Towers, built in 1967, consists of 147

efficiency and one-bedroom partially accessible apartments serving the elderly and near elderly. Completed in 1973, Paquin Towers consists of 200 fully accessible efficiency and one-bedroom apartments designed for mixed populations including persons with disabilities and the elderly. The Bear Creek development, located on Elleta Boulevard, consists of 78 townhomes serving families and households of all types.

CHA affirmatively promotes equal housing opportunity and fair housing practices and takes action to affirmatively market its units to all protected classes. The demographic composition of CHA's family sites reflects the general Columbia population with income at or below 30% of the median family income. The following table displays the demographic make-up of CHA public housing occupants.

Location	White	African American/Black	American Indian/Alaska Native	Asian	Native Hawaiian/Pacific Islander	Other	Hispanic	Elderly	Disabled	Female HOH
Bear Creek	31%	57%	0%	8%	0%	1%	7%	3%	8%	42%
Downtown	20%	68%	1%	5%	3%	3%	1%	5%	12%	42%
Oak Towers	58%	42%	0%	0%	0%	1%	1%	48%	55%	35%
Paquin Towers	80%	18%	2%	2%	0%	0%	2%	16%	91%	26%

Figure 40: Columbia Housing Authority Public Housing Unit Demographic Composition

Historically, Columbia's central city, which includes CHA's Downtown public housing development, has been an area of low-income segregated housing. These patterns still exist and reflect the racial composition of other areas of low-income housing in Columbia. As the need for affordable housing continues to grow in Columbia, poverty has become less concentrated in the central city area of Columbia and has spread out to other low-income housing areas scattered throughout the City.

The CHA has submitted a Rental Demonstration Program (RAD) application to HUD and applied for low-income housing tax credit financing to convert some of its Downtown public housing units to project based vouchers. The City has committed HOME funding to this project, which includes major renovations to public housing units and a conversion of these units to project based vouchers. The housing units are located at Lincoln Dr. and Unity Dr. The conversion of these units to rental will create more affordable housing choices in Columbia and give current public housing residents additional affordable housing choices throughout Columbia.

CHA Affordable Housing Efforts

1. CHA Public Housing and Section 8 Housing Choice Voucher Programs: CHA operates two key affordable housing programs: Public Housing and the Section 8 Housing Choice Voucher Program. Public Housing came first as a component of Columbia's urban renewal initiative of the 1950's and 1960's. CHA built 719 units of Public Housing between 1956 and 1978. These housing units are currently managed and maintained by CHA.

Public Housing: During FY2011, CHA completed the HUD mandated transition to “project-based asset management” for our Public Housing program which decentralized public housing management into four (4) Asset Management Projects (AMPs) as follows:

- **Providence Family Townhomes (AMP1)**
294 family units composed of 1, 2, 3, & 4 bedroom townhouses in heart of Columbia.
- **Bear Creek Family Townhomes (AMP2)**
78 family units composed of 1, 2, 3, & 4 bedroom townhouses on Elleta Boulevard.
- **Oak Towers (AMP3)**
147 high-rise units composed of 0 & 1 bedroom apartments designated for the elderly.
- **Paquin Tower (AMP4)**
200 high-rise units composed of 0 & 1 bedroom apartments designated for persons with disabilities and the elderly.

CHA currently manages four separate public housing developments with their own staff and a balanced budget. Revenues are generated by tenant rents in combination with a HUD determined operating subsidy. Maintaining a balanced budget by controlling maintenance and operational expenses is required if the property is to remain viable. Failing properties are removed from the public housing stock.

Section 8 Housing Choice Voucher Program: In the 1970’s, the “Section 8” Housing Choice Voucher Program expanded access to affordable housing by providing subsidies for existing rental housing throughout the community. CHA currently administers 1,132 Housing Choice Vouchers. This number includes 70 VASH vouchers. Families with a Housing Choice Voucher may choose housing throughout our community that meets their needs. As a result, poverty is less concentrated in one area of the community, as with the public housing model; and property maintenance and modernization becomes the responsibility of individual property owners rather than the housing authority.

CHA also provides three smaller housing subsidy programs serving homeless veterans, homeless persons with disabilities, and related special populations. Each of these programs is matched with community support services that support independent living and self-sufficiency.

- Veterans Administration Supportive Housing (VASH)..... 70 vouchers
- Shelter Plus Care 42 vouchers
- Tenant-Based Rental Assistance 20 vouchers

2. CHA Affordable Housing Initiative: In May 2012, The Columbia Housing Authority (CHA) launched a new affordable housing initiative designed to strengthen and revitalize neighborhoods located in the Heart of Columbia, Columbia’s First Ward. The CHA believes it should be a leader in the development of affordable housing that is energy-efficient and fully accessible to persons with disabilities. In this leadership role, the CHA will partner with other community organizations to develop a broad variety of affordable

housing options designed to revitalize neighborhoods and build strong, inclusive communities that reflect the diversity of Columbia.

The long-term goals of the CHA Affordable Housing Initiative are:

- To increase the supply of affordable housing in partnership with other community organizations.
- To revitalize neighborhoods in a way that builds strong, diverse, and inclusive communities.
- To provide energy-efficient affordable housing options that meet community needs.
- To revitalize our aging public housing family neighborhoods in the heart of Columbia.

3. The McBaine Townhomes Project: CHA Low-Income Services (CHALIS), the not-for-profit component unit of the Columbia Housing Authority, has fully leased the McBaine Avenue Townhomes project, an affordable housing and homeownership project comprised of five units of fully accessible housing. The project was completed with \$669,000 in HOME funding from the Missouri Housing Development Commission and \$150,000 of HOME funding from the City of Columbia. This project broke ground in 2007 and was completed in March, 2009. Current tenants will have an opportunity to purchase their rental units four years after the completion of the project, sometime in the year 2013, upon approval by HUD to convert this project from rental housing production to homeownership. The McBaine Townhomes project includes three three-bedroom townhomes and two two-bedroom attached townhomes. This urban infill project was designed to provide affordable homeownership for five low-income households. The townhomes are designed to be fully ADA accessible in order to serve elderly and/or disabled households. This project also promotes community stability in Columbia's central city.
4. Money Smart Program: The Columbia Housing Authority's Money Smart program is a series of financial education and homeownership counseling classes designed to assist prospective homeowners with money management and budgeting for future homeownership. It is free and open to anyone in Boone County and marketed to serve low- or moderate-income families. Money Smart classes are created through a partnership between the U. S. Department of Housing and Urban Development and the Federal Deposit Insurance Corporation. The classes meet weekly for 10 weeks, and each session is approximately 90 minutes in length. In 2012, CHA's Money Smart provided 1,700 hours of classroom education. Money Smart gives individuals the opportunity to review their credit report and score from each of the three credit reporting agencies. In addition, participants meet one-on-one with the instructor to discuss ways of improving or maintaining their scores. In 2012, 57 persons enrolled in one of the eight 10- week sessions. The program produced 43 graduates in 2012. Many of the other participants will re-enroll in future classes to complete the program.
5. Home Buyer Education Class: The Columbia Housing Authority continues to facilitate the Home Buyer Education Class with support from the City of Columbia's Community Development Block Grant for the second year. In 2012, 102 participants completed the Homebuyer Education Class. These 102 individuals received 4 hours of instruction from various professionals. These professionals from the lending, real estate, home inspection, and other areas volunteered their time to help the first time home buyer

class. The class is held at the ARC to provide easy access to all members of the community and surrounding areas. Individuals who complete the class routinely provide feedback from surveys. These surveys continually show that the Home Buyer Education Class is well structured and very helpful for these individuals who are beginning the home buying process for the first time.

6. Moving Ahead Program: The Moving Ahead Program is a community-based youth educational enrichment program operated out of the J.W. "Blind" Boone Community Center, located in the Columbia Housing Authority's (CHA) Downtown Family Site. The program is based upon a nationally recognized program, which was judged a model program by the Office of Juvenile Justice and Delinquency Prevention (United States Department of Justice) and the Substance Abuse and Mental Health Services Administration (United States Department of Health and Human Services).

The Moving Ahead Program is designed to keep children and youth with significant community risk factors, free of substance abuse and criminal activity. It builds resiliency in youths, strengthens families, and makes neighborhoods safer for children and their families. The program employs a positive youth development framework and uses intensive case management to coordinate and provide services to counteract the various factors that make children vulnerable to substance abuse and delinquency. The Moving Ahead Program is managed locally, in deference to local culture and setting, but shares with the other CASASTART programs the following eight basic core components:

- Case management
- Education services
- Family services
- Mentoring
- After school and summer activities
- Non-monetary incentives/recognitions
- Community-enhanced policing/enhanced enforcement
- Criminal/juvenile justice intervention

In 2012, the Columbia Housing Authority provided 27,620 hours of tutoring/mentoring to 117 at-risk children and youth in its Moving Ahead Program. Sixty-six students were enrolled in the program for 6 or more months and 49 attended programming a minimum of 30 days.

Also in 2012, Moving Ahead became a licensed after-school provider; meeting all the guidelines and regulations set forth by the State of Missouri for childcare providers serving school-age children

The Moving Ahead Program continues its partnership with the Youth Community Coalition's 21st Century Community Learning Project. Students benefit from the project's increased communication with Columbia Public Schools which includes the sharing of curriculum and grade level expectations as well as student level data. Students and families also receive wrap around services including onsite counseling. Students have daily access to the Columbia Public School Study Island Program to build and assess

math and language arts skills. Students participate in enrichment activities, healthy foods, and physical exercise. Outcomes are important to the YC2 Community Learning Project, so the progress and attendance of youth participants is tracked in the Missouri DESE Kids Care database. Program participants will eventually be compared with a control group of Columbia Public School students to see if Moving Ahead participation is making a difference in student performance and achievement.

7. Independent Living Program: It is the Columbia Housing Authority's goal to create partnerships to collaboratively provide supportive services to assist public housing residents who are elderly and/or have disabilities, to live as independently as possible and to prevent premature and unnecessary institutionalization. In 2012, the Columbia Housing Authority served 209 people with its Independent Living Program, and provided 8,320 units of service (1/4 hour of service coordination, support, and follow-up to residents equals one unit of service). In 2012, the Columbia Housing Authority received \$7,000 in City of Columbia social services contract funding for its Independent Living Program. This partnership allowed high-risk seniors and persons with disabilities to live as independently as possible in a safe and healthy environment.
8. Youth Community Coalition for a Drug Free Columbia: The Youth Community Coalition (YC2) supports programs that assist Columbia's at-risk youth as they develop into productive and self-sufficient citizens. It focuses on issues concerning healthy choices, substance abuse, education, and employment through community collaboration around effective programs with measurable outcomes. The Coalition's vision is to have a safe, healthy, drug-free community. The majority of its energy and attention is focused on increased collaboration, coalition growth, and building community capacity for prevention. More than 80 organizations and individuals from 12 community sectors are on the Coalition's membership roster, including more than 25 youth.

In 2012, YC2 received \$125,000 in funding from the Drug Free Community Support Program (United States Department of Health and Human Services, Substance Abuse and Mental Health Services Administration). The Coalition also received \$449,295 from the 21st Community Learning Center Program of the Missouri Department of Elementary and Secondary Education. The Coalition also applied for and received several small grants (\$10,000 or less) from the following funding sources: Substance Abuse and Mental Health Services Administration, ACT Missouri, Missouri Department of Natural Resources. YC2 continues to receive funding from the Missouri Department of Health and Senior Services through Columbia/Boone County Public Health and Social Services to operate the Teen Outreach Program at Hickman High School, Rockbridge High School and Jefferson Junior High School. In addition, the Coalition coordinated another successful application to the America's Promise Alliance resulting in the naming of Columbia as one of America's Top 100 Communities for Young People in 2012.

The Coalition has led several Prescription Drug Take-Backs since 2010 and was recognized for their efforts at the 2012 Community Anti-Drug Coalitions of America National Leadership Conference as the winner of their annual Dose of Prevention Award. The Prescription Drug Take-Backs involve many partners including Columbia/Boone

County Public Health and Social Services, Columbia Police Department, Boone County Sheriff's Department, University of Missouri and the Truman Veteran's Hospital.

9. Public Housing Family Self-Sufficiency Program: The Public Housing Family Self-Sufficiency Program provides incentives and support services, such as escrow accounts, career planning, skills training, job placement, homeownership, money management and education to enable Public Housing families to become more sufficient. The program is funded by a Housing and Urban Development Public Housing Family Self-Sufficiency Grant. Twenty-eight new participants entered the program in 2012, bringing the total number of participating households to 54. Five households increased their income by an average of \$21,370. Four households reduced their assistance from welfare and four more were able to cease receiving assistance altogether. Five began escrow accounts with an average of \$86 per household. Ten left the program to move into nonsubsidized housing. .
10. Residents Empowered, Working, and Reaching Dreams (REWARD): The REWARD (Residents Empowered: Working and Reaching Dreams) Program offers employers an incentive to hire a CHA resident. Up to \$2500 in employment subsidy is provided for each participant. In this economy, such an incentive will give CHA residents a competitive edge in the local job market. The employee gains skills, regains confidence and builds their work history which makes them more employable at the end of their 6 – 8 week experience.

Prior to employment, each participant must complete a 40 hour job readiness training program offered by Job Point. During this training, participants begin to prepare themselves to enter or re-enter the working world. The program addresses proper attire to proper interviewing skills. After successful completion of the training the participants receive a readiness certificate, which is kept in the individual's case file. Participants then complete a job application and submit a resume to the Self-Sufficiency Coordinator. The Coordinator completes a background check so that potential employers have all the information they need to make a decision about job placement. The Coordinator then matches the employee to an available position and makes the introductions. The participant must complete an interview and secure the position on their own. While employed, the Coordinator continues communication with the employer and participates to address any issues or concerns.

Participants must also complete CHALIS' 10-week Money Smart financial literacy course so that they can manage their new income successfully and move toward self-sufficiency.

REWARD participants are paid by CHALIS through a placement agency. The placement agency receives up to \$2,500 in employment subsidy per participant. Participants must continue to seek employment while completing their internship. While working for the company they will learn various job skills specific to the company such as office environment. Also, the participant will learn skills that will help them to pursue a job in the field as a career. Twenty-three participants were 13 successfully hired either full-time or part-time.

11. Powered by Moms Program: In 2012, the Heart of Missouri United Way awarded \$69,040 for Powered by Moms. This new program targets female head of households with children age 0-5 who are currently living in public housing with strategies aimed at increasing the number of low-income children who enter school ready to succeed. The program will be implemented beginning in January 2013 and is eligible for renewal each year through December 2017.

Powered by Moms will utilize a combination of evidence-based practices and models designed to help parents create an environment in their home that promotes success in school and life. PBM will provide in-home visits, case management, an 8-week parent education class, a Lend & Learn Library, a peer mentor, and a staff mentor. Some PBM components will be delivered through a working arrangement with First Chance for Children. PBM is designed to be an ongoing program, with annual recruitments of 40 in year one, at least 10 in year two to total 50, and enough to maintain a caseload of 50 through year 3.

12. The Housing Choice Voucher Family Self-Sufficiency Program: The Housing Choice Voucher Family Self-Sufficiency Program (Section 8 FSS) provides incentives and support services to assist families in becoming more self-sufficient. These services include, escrow accounts, career planning, skills training, job placement, homeownership, child care assistance, transportation services, money management, and education. The Section 8 FSS program is funded by a Housing and Urban Development Housing Choice Voucher FSS Grant. There were 60 participants in this program in 2012 with 30 of them with active escrow accounts. Those 30 participants averaged \$2,987.00 in the escrow accounts. During 2012 seven participants utilized their escrow accounts for a total of \$12,195.33 to help pay for car repairs, car purchases, books, school tuition, and other expenses related to becoming self-sufficient.

13. Section 8 Homeownership Program: The Housing Choice Voucher Homeownership Program assists participants in the purchase of a home rather than using their voucher subsidy to assist with rent to a landlord. The program allows first-time homeowners to use voucher subsidy to meet monthly homeownership expenses. Benefits are calculated in a similar way to the current Housing Choice Voucher subsidy with payments going directly to a mortgage lender or the homeowner. In 2012, 10 Housing Choice Voucher Program residents were participating in this program and consisted of 2 two-person households, 4 three-person households, 3 four-person households, and 1 five-person household.

14. Shelter Plus Care: The Shelter Plus Care Program (S+C) provides rental assistance for hard-to serve homeless persons with disabilities in connection with supportive services funded from sources outside the program. S+C is a program designed to provide housing and supportive services on a long-term basis for homeless persons with disabilities, i.e. those with serious mental illness, chronic problems with alcohol and/or drugs, dual diagnoses (both mental illness and chronic alcohol and drug problems), and acquired immunodeficiency syndrome (AIDS/HIV) or related diseases and their families who are living in places not intended for human habitation (street or in emergency shelters). The

program allows for a variety of housing choices and a range of supportive services funded by other sources in response to the needs of the hard-to reach homeless population with disabilities. In 2012 CHA had 18 new clients participate in this program and served a total of 71 families throughout the year with 18 of the families receiving assistance being chronically homeless. \$324,656 was expended in rental assistance in 2012 to assist these families.

15. Tenant Based Rental Assistance: The Tenant Based Rental Assistance Program (TBRA) is a program designed to provide rental assistance within the Columbia city limits to house special under-served populations of very low-income individuals and families. This program will be for persons with “inadequate housing plans” who have mental health issues; are being released from correctional institutions; have completed substance abuse treatment programs; are victims of domestic violence; or have another special need and/or disability. In 2012, CHA served 31 households and 54 individuals. In 2012, CHA expended \$107,474.00 in rental assistance for TBRA.

16. Veterans Administration Supportive Housing (VASH) Program: The Veterans Administration Supportive Housing (VASH) Program is designed to provide rental assistance to homeless veterans and their families in conjunction with case management and clinical services through the Department of Veterans Affairs Medical Center supportive service sites. In 2012, CHA had 22 new clients participate in the program and served a total of 83 families with 22 of those families being chronically homeless. In 2012, CHA expended \$236,153.15 for rental assistance to house Veterans.

17. The ROSS Family Service Coordinator: The primary goal of the resident services coordinator is to help reduce barriers to employment and job training by increasing the number of residents who access employment readiness, skills training, financial management, and asset building programs in order to increase the number of residents who are employed.

In order to achieve this goal, the Family Service Coordinator:

- Acts as a liaison between the residents and local service providers
- Markets the program to residents
- Provides general case management which includes intake, assessment, education, and referral of residents to service providers in the general community
- Coordinates and oversees the delivery of services, ensuring services are provided on a regular, ongoing, and satisfactory basis
- Coordinates and sponsors educational events
- Assists the PHA in creating resident groups to promote self-sufficiency efforts and/or encourage residents to build informal support networks with other residents, family, and friends
- Monitors the ongoing provision of services including supportive services from community Agencies

Of the 252 unduplicated residents receiving services in 2012:

- 22 increased their income by gaining employment above the minimum wage and were employed 6-12 months or more.

5. Accessibility

Market

There is currently no market data that specifically identifies the number of Columbia housing units that have accessibility features. Census data demonstrates there are 9,203 persons over the age of 65. 2012 American Community Survey data estimates approximately 10,243 persons in Columbia have some type of disability. This data demonstrates accessibility needs in housing for approximately 19,400 persons, or approximately 8,362 households when assuming average household size is 2.32 persons. The availability of accessible housing is potentially a significant impediment to fair housing. The City should conduct further analysis to determine the number of available affordable housing units with accessible design features. Current affordable housing options funded through HUD programs are displayed in figure 40.

Affordable Housing Development	# of Units
Hanover Gardens I, II, III and Hanover Gardens	64
Paquin Towers	200
Freedom House	38
Bethel Ridge I and II	84
Gentry Estates	42
McBaine Townhomes	5
Total	433

Figure 41: City of Columbia, HUD funded Affordable Rental Housing with Accessible Design Features

There are several other rental and homeownership opportunities in Columbia that include accessibility features; however current data does not adequately specify the total number of units available, both HUD funded and privately funded.

Zoning and Building Regulations

In 2008, the City's Affordable Housing Policy Committee recommended revising City codes to require a percentage of Universal Design measures be included in new structures with more than 2 housing units. Implementation of this measure has not occurred or been considered by Council. The City has implemented new Universal Design requirements for all HUD funded affordable housing projects funded with CDBG and HOME funding. The new minimum Universal Design requirements are as follows:

Minimum Required Universal Design Elements

1. Zero-step walkway entrances for front and rear of home meeting Uniform Federal Accessibility Standards (UFAS) requirements.

- a. 60" wide
 - b. 1:20 rise to run ratio
 - c. 60" x 60" level landings
2. ½" maximum interior door thresholds.
3. Finished exterior and interior door widths of at least 32".
4. 42" minimum hallway width.
5. Rocker style light switches.
6. 60" by 60" turning space in at least one bathroom.
7. Blocking in bathrooms for installation of grab bars in accordance with UFAS.

The City conducted a fair housing focus group in November of 2013 and requirements for Universal Design features in developments were an important strategy identified by group members. The purpose of the focus group was to identify the most critical fair housing needs and strategies to address those needs. The group identified "lack of accessible housing" as a critical need and "increase rental and owner occupied units that include Universal Design features" as an important strategy to address fair housing in Columbia. Further review of the meeting findings is contained in Section 7 of the AI.

6. Fair Housing in Columbia

City Efforts

The City of Columbia currently funds a .5 FTE position in the legal department to conduct fair housing counseling, staff support to the Columbia Human Rights Commission and Disabilities Commission, as well as to provide fair housing education and outreach in the community.

The City has also provided CDBG funding to a local non-profit organization working with a collaborative group to implement a new fair housing website, midmohousing.com. The website provides information to Columbia tenants in the areas of fair housing and energy efficiency. This site serves as an educational resource to tenants in locating affordable rental property and ensuring fair treatment under current housing laws.

The City has also provided CDBG funding to the MU Law School in order to conduct fair housing testing. A group of students supervised by an MU Law Professor will be conducting fair housing testing on 20 separate locations with Columbia in the spring of 2014. Results will inform the City on fair housing education and outreach needs in the community. Testing will not result in enforcement activities.

Human Rights Commission

The City of Columbia Human Rights Commission is authorized and charged with the investigation of complaints of discrimination that occur within the City of Columbia. The Commission does not have the authority to enforce complaints of discrimination; however City staff acts as a resource to complainants and makes referrals to the EEOC and Missouri Commission on Human Rights.

The City of Columbia Human Rights Commission also recommends annual funding allocations for Human Rights Enhancement funding. This funding is used to contract with local organizations to conduct human rights educational activities and programs in Columbia.

Complaints

The City of Columbia Human Rights Commission has received 34 written inquiries and 4 written complaints within the past 5 years. The Missouri Commission on Human Rights has received 9 written housing complaints for Columbia from 2010-2012. Missouri Commission on Human Rights housing complaint data can be viewed in Figure 41.

		CY2010	CY2011	CY2012
Total Charges		4	3	2
Open		1		2
Closed - No Cause Finding Issued		3	2	
Closed - Withdrawal With Benefits			1	
Issues Alleged				
I1	Intimidation	1		
O1	Other	2		2
R6	Reasonable Accommodation	1		
T2	Terms/Conditions	2	3	
Bases Alleged				
AM	Religion-Muslim			1
GM	Sex-Male			1
NO	National Origin-Other	1		1
OH	Disability (Not ADA)	2		1
OO	Other	1		
OR	Retaliation	1		
RB	Race-Black/African American	1	3	

Figure 42: Missouri Commission on Human Rights Housing Complaints, City of Columbia

7. Fair Housing Needs and Strategies

Focus Group Summary

The City of Columbia held a fair housing focus group meeting on November 12, 2013 at the Columbia Housing Authority Oak Towers. The mission of the meeting was to obtain public input identifying impediments to fair housing in Columbia and prioritize strategies for addressing fair housing needs in Columbia. The focus group was facilitated by MU Extension staff to allow the discussion to be led by a 3rd party facilitator. The following discussion questions were asked of focus group participants:

1. What are the most significant fair housing problems in Columbia? (Needs)
2. What are the most important strategies the City should undertake to further fair housing in Columbia? (What should we be doing to address fair housing needs?)

The meeting was attended by 20 participants from a variety of organizations as shown in Figure 42.

Number	Name	Organization
1	Jeff Radmer	Community Development Commission
2	Andrea Tapia	Columbia Housing Authority
3	Kenny Willenburg	Mills Properties
4	Rigel Oliveri	MU Law School
5	Sheila Garten	Mills Properties/Columbia Apartment Association
6	Katie Freechling	Refugee & Immigration Services
7	Maurice Harris	Community Development Commission
8	Lynn Limback	Boone County National Bank
9	Jennifer Graves	True North of Columbia
10	Steve Hollis	City of Columbia
11	Phil Steinhaus	Columbia Housing Authority
12	Tracie Hall	True North
13	Ida Hatton	Columbia Housing Authority
14	Lee Radtke	Columbia Housing Authority
15	Darin Preis	Central Missouri Community Action
16	Joanie Chenault	Boone County Family Resources
17	Don Love	MO. Assoc. for Social Welfare
18	Tec Chapman	Services for Independent Living
19	Kelley Lucero	Central Missouri Community Action
20	Dionne George	MU Off-Campus Student Services

Figure 43: City of Columbia Fair Housing Focus Group Attendees

The results of the meeting include a summary of the most critical fair housing needs and most important strategies to address fair housing needs in Columbia. Results of the meeting will be presented as recommendations to the Community Development Department to be approved to recommend to Council for final approval. The results of the meeting are as follows:

Most Critical Needs Identified

1. *Lack of fair housing education.*
2. *Lack of quality affordable housing.*
3. *Lack of 1 bedroom housing units.*
4. *Lack of accessible housing.*

Most Important Fair Housing Strategies Identified

1. *Education and outreach for tenants and landlords on fair housing.*
2. *Provide incentives for developers and require % of units developed to be affordable.*
3. *Increase rental and owner occupied units that include Universal Design features.*

4. *Require education for landlords and required certification.*

8. Fair Housing Testing Project

Project Summary

The City of Columbia procured the University of Missouri-Columbia Law School to conduct fair housing testing. The project consisted of forty paired tests of rental properties in Columbia. The discrimination tested for was race discrimination and each test pair consisted of one black tester and one white tester who were otherwise evenly matched. The test reports were examined by a person without knowledge of the person submitting the testing report.

Results

None of the minority testers reported experiencing the most dramatic forms of housing discrimination, such as landlord refusing to meet with or refusing to tell them about any available units. There were differences in treatment observed in some tests. The differences in treatment were characterized as either significant (for example, if one tester was told about more available units than the other tester) or minor (for example, if one tester was provided an application while the other was told to go pick one up from the rental office).

The overall results were consistent with current HUD data for discrimination, where minority testers are 16% more likely to be told about or shown fewer units than their white counterparts and 3% more likely to experience other forms of undesirable treatment, due to implicit bias. It is important to note that this project was not used as an enforcement tool and City staff has no knowledge of the rental properties that were tested. The main purpose of this study is to serve as a learning tool.

The City of Columbia and MU Law School presented the findings of this study to the Columbia Apartment Association and will continue to utilize examples from the study and its conclusions as a learning tool to reduce discrimination in rental housing. The full report is attached to this document.

9. Fair Housing Impediments and Strategies Identified

This final section of the City's AI identifies a list of impediments to fair housing and strategies to address impediments identified. These items were derived from data analysis and from the City's fair housing focus group. The impediments and strategies identified to address those impediments will inform the City's housing efforts that will be outlined in the City's 2015-2019 Consolidated Plan.

Impediments to Fair Housing

Figure 43 lists impediments to fair housing and the source for identifying these impediments. The staff analysis source includes data reviewed and analyzed throughout the AI. The focus group source includes the 4 most critical impediments identified by the City's fair housing focus group held on November 12.

Number	Impediment	Source
1	Income disparities linked to race and disability and its impact on a household's ability to afford quality housing.	Staff Analysis
2	Lack of affordable accessible housing available for households with elderly persons or persons with a disability.	Staff Analysis
3	Limited grocery, sidewalk and transportation services in north, northeast and southeast outlying areas.	Staff Analysis
4	Vacant lots identified as underutilized land for affordable housing in the NRT area.	Staff Analysis
5	Lack of fair housing education.	Focus Group
6	Lack of quality, affordable housing.	Focus Group
7	Lack of 1 bedroom housing units.	Focus Group
8	Lack of accessible housing.	Focus Group

Figure 44: City of Columbia Impediments to Fair Housing

Strategies to Address Impediments to Fair Housing

Figure 44 lists strategies address fair housing and the source for identifying these strategies. The staff analysis source includes data reviewed and analyzed throughout the AI. The focus group source includes the 4 most important strategies identified by the City's fair housing focus group held on November 12.

Number	Strategy	Source
1	Provide fair housing education and outreach for tenants and landlords.	Focus Group
2	Provide incentives for developers and require a percentage of units developed to be affordable.	Focus Group
3	Increase rental and owner occupied units that include Universal Design features.	Focus Group
4	Require fair housing education for landlords and require certification	Focus Group/fair housing testing project
5	Provide incentives to develop affordable housing on undeveloped land in the NRT area.	Data Analysis
6	Revise and formalize minimum Universal Design requirements for all affordable housing developed with HUD funding.	Data Analysis
7	Prioritize neighborhood improvements in CDBG eligible areas with more limited access to services.	Data Analysis
8	Conduct research to better understand accessible housing needs in Columbia and develop strategies around those needs.	Data Analysis

Figure 45: City of Columbia Strategies to Address Fair Housing

Fair Housing Testing Project

A Report for the City of Columbia, MO

**By Rigel Oliveri, Associate Professor
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June 30, 2014

Fair Housing Testing – An Overview

Nearly four decades after the passage of the federal Fair Housing Act, housing discrimination remains stubbornly persistent. It is also notoriously difficult to detect. An individual who makes an inquiry about the availability of housing often has no way of knowing whether he is being treated the same as other applicants. One of the most effective mechanisms for determining this is fair housing testing.

The most common type of testing is paired testing, in which two people pose as potential renters. The testers are presented as equally qualified for the housing and are as similar as possible in all respects except for the characteristic that is being tested for. They each contact a housing provider within the same time frame, make an inquiry about the availability of housing, and then record in detail what they are told. The test reports are then examined for differences in treatment.

Systemic testing can be one of the most effective ways of revealing discriminatory housing practices. It can show whether a landlord is being truthful about the non-availability of an advertised unit. It can also detect more subtle discriminatory practices, such as a landlord telling the minority tester about fewer units, steering her to different units, making the application process more difficult, or otherwise treating the tester differently from her white counterpart.

It should be noted that not all differences in treatment are the product of discrimination. Variances may occur as a result of random factors, and it is not uncommon for minority testers to be treated more favorably than white testers. Ultimately, it is the presence or absence of patterns that provides the most useful insight as to whether discriminatory practices are occurring. In particular, the “net measure” of different treatment – the difference between the number of tests in which the minority tester is treated more favorably and the number of tests in which the white tester is treated more favorably – can most accurately reflect systematic disadvantages faced by minority home-seekers. In addition, a descriptive narrative of test outcomes can provide a compelling portrait of some of the types of differential treatment that minority home-seekers face.

Paired “inquiry” testing of this sort does have some limitations. It does not reach practices such as discriminatory advertising which may limit the pool of individuals who even apply for housing. It also does not reach discriminatory conduct that might occur after the inquiry phase, such as differences in processing applications or negotiating lease terms. Because the testers typically present as financially well-qualified to rent the housing, such tests do not capture the experiences of more marginally qualified home-seekers.¹ Finally, testing is focused on the behavior of individual housing providers. It does not address the systemic factors which might disadvantage minority populations, such as a lack of affordable housing or policies which have a disparate impact.

Nevertheless, testing can be a valuable tool to provide a snapshot of housing practices in a particular area, which can guide policymakers in identifying problems and developing effective responses.

¹ Not only are such individuals disproportionately likely to be members of minority groups, research indicates that when testers do pose as low-income home-seekers, more discrimination occurs.

The Columbia Testing Project

Methodology

The current project consists of forty paired tests of rental properties in Columbia, Missouri. The type of discrimination tested for was race discrimination, so each tester pair contained one black tester and one white tester who were otherwise evenly matched. Roughly half of the tests were carried out by phone and half were performed in person.² A variety of property types were tested, including large student-oriented apartments, townhomes, and single-family homes. All testers presented as well-qualified to rent in terms of income and employment status. An effort was made to test each property twice; however in some cases this was not possible because the property became unavailable between the first test and the planned second test.

The test reports were examined for differences in treatment. This examination was done “blind,” meaning that it occurred without the examiner knowing which test report was from the black tester and which was from the white tester.

Results

None of the minority testers reported experiencing the most dramatic forms of housing discrimination, such as a landlord refusing to meet with them or refusing to tell them about any available units. There were, however, more subtle differences in treatment observed in some of the tests. These differences in treatment were characterized as either significant (for example, if one tester was told about more available units than the other tester) or minor (for example, if one tester was provided an application while the other was told to go pick one up from the rental office).

Of the 36 usable tests,³ there were: six instances in which the white testers were significantly favored, and one instance in which the black tester was significantly favored; three instances in which the white tester was slightly favored and one instance in which the black tester was slightly favored. This breaks down as follows:

- Share of tests in which white tester was treated more favorably: Nine (six significant, three minor)
- Share of tests in which black tester was treated more favorably: Two (one significant, one minor)
- Difference between the two (net measure) = Seven
- Net measure difference as a percentage of total = 19%

² Research has shown that most people are able to correctly guess the race or ethnicity of another person from hearing the sound of his or her voice. Phone testing is now common as a testing procedure.

³ Four tests had to be discarded because circumstances prevented them from providing a useful comparison, such as where one tester was able to reach someone by phone while the other tester called repeatedly but no one ever answered and there was no ability to leave a voicemail.

Analysis

The minority testers in this project did not experience the most blatant forms of racial discrimination in housing – landlords refusing to meet with them or provide them with any information about available units. This is consistent with the results of a recent testing project conducted by the Department of Housing and Urban Development (HUD) throughout the United States.⁴

Some did, however, receive different treatment from their white counterparts. The net measure difference as a percentage of the total usable tests performed was 19% in favor of the white testers. This is also consistent with the results of the HUD project, which found that minority testers are 16% more likely to be told about or shown fewer units than their white counterparts and 3% more likely to experience other forms of undesirable treatment.⁵

Although it is noteworthy that the results of the Columbia project are so consistent with those from HUD's nationwide project, extreme caution should be exercised in drawing strong inferences from Columbia project's results. The Columbia project involved a very small sample size. To develop data with a sufficient confidence interval to draw reliable conclusions about Columbia's rental market would have required a number of tests well beyond the resources of this project. (By way of comparison, the HUD project referenced above involved thousands of tests conducted in 28 metropolitan areas.)

Rather than focusing too heavily on the numbers, it may be more useful to review the narrative descriptions of what occurred during some of the tests, as they present a representative sample of the types of differential treatment that housing seekers typically face.

Example: Providing less information about available units

The white tester called to inquire about an apartment that was advertised on-line as a "Downtown 1- Bedroom" for a specific price. The person she spoke with confirmed that the apartment was still available, gave her some additional details about the apartment, and then told her about some other apartments that were managed by the same company. The black tester called shortly thereafter to ask about the same "Downtown 1-Bedroom" at the same advertised price. Although the black tester spoke to the same individual as the white tester, this time the person claimed not to know anything about a one bedroom unit downtown. She did, however, refer the black tester to the other properties managed by the same company.

Examples: Lack of encouragement and information

The white tester was greeted promptly and warmly by the manager on duty when she walked into the office. The manager encouraged the white tester to have a seat and look at floor plans, and then took her on a tour of a model unit, during which the manager described the apartment's amenities in great detail. At the end of the encounter, the manager also referred

⁴ The resulting report, *Housing Discrimination Against Racial and Ethnic Minorities 2012*, can be found at http://www.huduser.org/portal/publications/fairhsg/hsg_discrimination_2012.html.

⁵ Because of differences in the way the data were collected and analyzed, a direct comparison of all differential treatment observed by the current project and the HUD testing project is not possible.

the tester to a neighboring complex managed by the same company, which she said would also have a unit coming available on a specific date. In contrast, when the black tester entered the office the same manager failed to acknowledge her. Instead, the black tester stood around for several minutes before finally asking the manager for some assistance. The manager showed her a model unit, but said nothing about the amenities of the complex unless asked. (Getting the information was “like pulling teeth,” the tester reported.) At the end of the encounter, the manager told the black tester that the neighboring complex “might also have something” but gave no other specific information.

At another property, the manager chatted with the white tester at length about the tester’s children and emphasized how much she and her family would “love” living at the complex. She encouraged the white tester to come and view the unit that she (the manager) lived in, and suggested that the tester also consider a larger unit that was slightly more expensive but significantly more spacious. Finally, the manager offered the white tester a bonus of a gift card or a portion of the first month’s rent free if she signed a lease that month. The same manager, in contrast told the black tester simply that the complex was “nice,” that the unit she asked about was available, and that she could set up a tour. When the black tester attempted to talk about whether the property would be a good place for families the manager refused to discuss this with her, citing fair housing laws. The manager never told the black tester about any bonus offer for signing a lease that month.

Example: Steering⁶

Two in-person paired tests were done of the same complex. Each time, the black testers were encouraged to view an apartment at a neighboring complex which was owned by the same company. One of the black testers was never informed of a vacancy at the complex he originally inquired about. In contrast, both of the white testers were told about vacancies at the original complex, and neither of them was referred to the neighboring complex.

Examples: Emphasis on screening and qualifications

At one property, the black tester was told pointedly that his income would need to be verified and then given a copy of the complex’s procedures for screening tenants. The white tester was not told about income verification or given a copy of the screening procedures.

At another property, the black tester was told that the complex would do a background check, criminal history check, and credit check on him. The white tester was not told this.

Additional Observations

⁶ Steering occurs when people of different races are directed toward different complexes, units, or neighborhoods. While this might not seem to privilege one group over another (assuming the places are of equivalent quality), such treatment perpetuates segregated patterns, which in itself violates fair housing laws.

Although the tests were conducted to study race-based differences in treatment, some of the tests revealed additional information which might be informative. For example, a number of the testers reported being asked pointed questions about whether or not they have pets. Several housing providers clearly viewed pets as undesirable. It is, of course, neither illegal nor uncommon for landlords to prohibit pets. Strong anti-pet sentiments, however, may be an indication that the landlord is also inclined to refuse to make a reasonable accommodation for disabled individuals who use service animals.⁷ This would be a logical area in which to do outreach and education (for both landlords and the general community) as well as additional testing.

On a positive note, a number of testers were inquiring about housing for families with children. They were almost all met with encouragement and enthusiasm when they told the housing providers that they had kids. Part of this may be due to the fact that most of those tests involved properties such as large single-family homes which would be logical places in which to expect families with children. Nevertheless, the fact that none of the Columbia landlords seemed bothered by renting to families with children is an encouraging sign in light of the nationwide prevalence of familial status discrimination complaints.

⁷ In addition, questions about accommodations for service animals predominated at recent fair housing events for housing providers held in Jefferson City and Columbia. While these events were not related to the testing project, the discussions at both revealed that many attendees were concerned about their rights and obligations with respect to this issue.

Conclusion and Recommendations

It bears repeating that the scope of this project was too small to produce robust statistical data about discrimination in the housing market in Columbia. Nevertheless, it is noteworthy that the findings of the Columbia project are extremely consistent with those found by HUD's nationwide study: Minority renters are unlikely to encounter the most blatant forms of discrimination; however they do appear to be somewhat likely to experience less obvious forms of different treatment.⁸ While more subtle, these differences in treatment could still prevent or discourage minority renters from obtaining housing on terms equal to that of white renters.

It would be a mistake to assume that the instances of differential treatment observed in this study are the product of intentional racial animus. They may very well be the result of "implicit bias," which refers to attitudes or stereotypes that affect our understanding, actions, and decisions in an unconscious manner. For example, the landlord who pointedly informs a minority applicant that he will have to pass a series of background checks and have his income verified but does not say this to a white applicant may think he is simply addressing the relative likelihood that each can qualify for tenancy, without questioning where this assumption comes from. A rental agent may steer a black applicant toward or away from a particular complex based on her notion of where he would be most comfortable, without recognizing the role that race plays in her thought process.

Implicit bias, however unintentional, can still create impediments to integrated housing and equal housing opportunity, and therefore it should be addressed. Behavioral scientists have found that simple exhortations to "treat everyone equally" have almost no effect on levels of implicit bias. Thus, basic fair housing training, while important to ensure that housing providers understand their obligations under the law, will do little to change the more subtle behaviors identified in this study. The most effective way to challenge implicit bias is (1) to recognize that it exists and (2) to confront it directly in concrete and relevant ways. In the context of housing, this might consist of trainings in which landlords and real estate professionals are introduced to the concept of implicit bias and then encouraged to examine their own assumptions about applicants and tenants, perhaps by discussing specific scenarios of the sort presented in this study.

In summary, while the most blatant forms of discrimination in housing appear to be largely a thing of the past, the Columbia testing project provides an illuminating picture of some common types of subtle differences in treatment that even well-qualified minority renters may continue to experience (a state of affairs that HUD describes as "a glass half full"). This should be viewed as an opportunity for further improvement, and hopefully the results of this study can provide a useful framework for next steps as Columbia strives to increase fairness and equal opportunity in housing for all of its citizens.

⁸ It is also important to reiterate that the Columbia project, like HUD's larger project, only involved testers who were well-qualified for the housing about which they were making inquiries. As noted previously, it is almost certain that more significant levels of discrimination would be observed in tests involving a low-income and more marginally qualified population.