State of Alabama Non-Entitlement

Analysis of Impediments to Fair Housing Choice

Has Your Right to Fair Housing Been Violated?

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

The United States Department of Housing and Urban Development

Address:
Office of Fair Housing and Equal Opportunity
Department of Housing and Urban Development
451 Seventh Street SW, Room 5204
Washington, DC 20410-2000
Telephone: (202) 708-1112
Toll Free: (800) 669-9777
Web Site: www.HUD.gov

Alabama Department of Economic and Community Affairs
P.O. Box 5690
Montgomery, Alabama 36103
Telephone: (334) 242-5100
FAX: (334) 242-5099
Email: contact@adeca.alabama.gov

Local Fair Housing Organizations:

Residents of Southern Alabama Contact:

Center for Fair Housing
602 Bel Air Boulevard
Mobile, Alabama 36606
Telephone: (251) 479-1532
FAX: (251) 479-1488
Email: info@sacfh.org

Residents of Central Alabama Contact:

Central Alabama Fair Housing Center
2867 Zelda Road
Montgomery, Alabama 36106
Telephone: (334) 263-4663
FAX: (334) 263-4664

Residents of Northern Alabama Contact:

Fair Housing Center of Northern Alabama
1728 Third Avenue North
Birmingham, Alabama 35203
Telephone: (205) 324-0111
FAX: (205) 320-0238

2020 State of Alabama
Analysis of Impediments to Fair Housing Choice

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Section I. Executive Summary

Overview

Title VIII of the 1968 Civil Rights Act, also known as the Fair Housing Act, protects people from discrimination based on race, color, national origin, religion, sex, familial status, and disability when they are renting or buying a home, getting a mortgage, seeking housing assistance, or engaging in other housing related activities. The Act, and subsequent laws reaffirming its principles, seeks to overcome the legacy of segregation, unequal treatment, and historic lack of access to housing opportunity. There are several statutes, regulations, and executive orders that apply to fair housing, including the Fair Housing Act, the Housing Amendments Act, and the Americans with Disabilities Act.[1]

Affirmatively furthering fair housing is defined in the Fair Housing Act as taking "meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics".[2] Specifically, affirmatively furthering fair housing requires that recipients of federal housing and urban development funds take meaningful actions to address housing disparities, including replacing segregated living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.[3] Furthering fair housing can involve developing affordable housing, removing barriers to affordable housing development in high opportunity areas, investing in neighborhood revitalization, preserving and rehabilitating existing affordable housing units, improving housing access in areas of concentrated poverty, and improving community assets.

Assessing Fair Housing

Provisions to affirmatively further fair housing are long-standing components of the U.S. Department of Housing and Urban Development's (HUD's) housing and community development programs. These provisions come from Section 808(e)(5) of the Fair Housing Act, which requires that the Secretary of HUD administer federal housing and urban development programs in a manner that affirmatively furthers fair housing.[4]

In 1994, HUD published a rule consolidating plans for housing and community development programs into a single planning process. This action grouped the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grants (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) programs into the Consolidated Plan for Housing and Community Development, which then created a single application cycle. As a part of the consolidated planning process, and entitlement communities that receive such funds from HUD are required to submit to HUD certification that they are affirmatively furthering fair housing (AFFH).

In July of 2015, HUD released a new AFFH rule which provided a format, a review process, and content requirements for the newly named "Assessment of Fair Housing", or AFH.[5] The assessment

[1] https://www.hud.gov/program_offices/fair_housing_equal_opp/fair_housing_and_related_law
[2] § 5.152 Affirmatively Furthering Fair Housing
[3] § 5.152 Affirmatively Furthering Fair Housing
[4] 42 U.S.C.3601 et seq.
[5] 80 FR 42271. https://www.federalregister.gov/documents/2015/07/16/2015-17032/affirmatively-furthering-fair-housing

would now include an evaluation of equity, the distribution of community assets, and access to opportunity within the community, particularly as it relates to concentrations of poverty among minority racial and ethnic populations. Areas of opportunity are physical places within communities that provide things one needs to thrive, including quality employment, high performing schools, affordable housing, efficient public transportation, safe streets, essential services, adequate parks, and full-service grocery stores. Areas lacking opportunity, then, have the opposite of these attributes.

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

However, on January 5, 2018, HUD issued a notice that extended the deadline for submission of an AFH by local government consolidated plan program participants to their next AFH submission date that falls after October 31, 2020.[6] Then, on May 18, 2018, HUD released three notices regarding the AFFH; one eliminated the January 5, 2018, guidance; a second withdrew the on-line Assessment Tool for local government program participants; and, the third noted that the AFFH certification remains in place. HUD went on to say that the AFFH databases and the AFFH Assessment Tool guide would remain available for the AI; and, encouraged jurisdictions to use them, if so desired.

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

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

Socio-Economic Context

While the population in the Non-Entitlement Areas of Alabama is growing, the racial and ethnic makeup of the area is not changing significantly. There are areas in the Non-Entitlement Areas of the State, however, that do see high concentrations of black and Hispanic residents. The population is also aging, with those aged 65 and older growing at the fastest rate in the Non-Entitlement Areas of the State. Limited English Proficiency includes an estimated 1.4 percent (38,904 people) of the population speaks Spanish at home, followed by 0.1 percent speaking

[6] 83 FR 683 (January 5, 2018)

Chinese, Korean, Vietnamese, or Other Indo-European languages. In 2017, some 85.2 percent of persons had a high school education or greater, including 33.5 percent with a high school diploma or equivalent, 31.2 percent with some college, 12.3 percent with a Bachelor's Degree, and 6.6 percent with a graduate or professional degree.

In 2018, unemployment in the Non-Entitlement Areas was at 3.9 percent. This is representative of a labor force of 1,322,785 people and 1,271,796 people employed. Real per capita income has continued to grow in recent years. However, poverty has grown to 16.8 percent, representing 487,794 persons living in poverty in the Non-Entitlement Areas of the State.

The Non-Entitlement Areas experienced a drop-off in housing production during the recent recession, which has begun to recover. In 2018, there were 10,735 total units produced in the study area, with 9,660 of these being multifamily units. The value of single-family permits, however, has continued to rise, reaching $221,840 in 2018. Since 2010, the study area has seen an increase in the proportion of vacant units, experiencing a rise in the proportion of "other" vacant units.

Overview of Findings

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

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

1. High: Factors that have a direct and substantial impact on fair housing choice, or that Alabama Department of Economic and Community Affairs has no authority or limited authority to mandate change, and no capacity or limited capacity to address.
2. Medium: Factors that have a less direct impact on fair housing choice, or that Alabama Department of Economic and Community Affairs has limited authority to mandate change.
3. Low: Factors that have a slight or largely indirect impact on fair housing choice, or that Alabama Department of Economic and Community Affairs has limited capacity to address.

Table I.1
Contributing Factors
State of Alabama Non-Entitlement Areas

Contributing Factors	Priority	Justification
Moderate to high levels of segregation	High	In 2017, black, American Indian, Asian, Native Hawaiian, "other" race, and Hispanic households had a moderate to high level of segregation, according to the Dissimilarity Index. This level of segregation has grown since 2010.
Access to low poverty areas and concentrations of poverty	High	Low poverty index is markedly lower for black, Native American, and Hispanic populations than white school proficiency, indicating inequitable access to low poverty areas. In addition, there are concentrations of poverty in the Non-Entitlement Areas of the State, particularly in the central and more rural areas of the State.
Access to labor market engagement	Med	Black, Native American, and Hispanic households have less access to labor market engagement as indicated by the Access to Opportunity index. However, the State has little control over impacting labor market engagement on a large scale.
Access to School Proficiency	Med	Black, Native American, and Hispanic households have lower levels of access to proficient schools.
Insufficient affordable housing in a range of unit sizes	High	Some 23.5 percent of households have cost burdens. This is more significant for renter households, of which 37.8 percent have cost burdens. In addition, some 65.4 percent of households below 30 percent HAMFI have housing problems. This signifies a lack of housing options that are affordable to a large proportion of the population.
Black and Hispanic households have disproportionate rates of housing problems	High	The average rate of housing problems, according to CHAS data is 24.9 percent for all households in the State of Alabama Non-Entitlement Areas. Black households face housing problems at rate of 37.4 percent, and Hispanic households at a rate of 37.9 percent.
Discriminatory patterns in Lending	Med	The mortgage denial rates for black, Native American, and Hispanic households are higher than the jurisdiction average according to 2008-2017 HMDA data. This was also true for female applicants during this time period.
Insufficient accessible affordable housing	High	The number of accessible affordable units may not meet the need of the growing elderly and disabled population, particularly as the population continues to age. Some 55.8 percent of persons aged 75 and older have at least one form of disability.
Failure to Make Reasonable Accommodations	High	Disability was the number one fair housing basis for complaints with cause between 2004 and 2014. Failure to make reasonable accommodations accounted for the second largest number of issues for fair housing complaints during this time period.
Lack of fair housing infrastructure	High	The fair housing survey and public input indicated a lack of collaboration among agencies to support fair housing.
Insufficient fair housing education	High	The fair housing survey and public input indicated a lack of knowledge about fair housing and a need for education.
Insufficient understanding of credit	High	The fair housing survey and public input indicated an insufficient understanding of credit needed to access mortgages.

Fair Housing Issues, Contributing Factors, and Proposed Achievements

Table I.2 summarizes the fair housing issues/impediments and contributing factors, including metrics, milestones, and a timeframe for achievements.

Table I.2
Recommended Fair Housing Issues, Contributing Factors, and Recommended Actions
State of Alabama Non-Entitlement Areas

Fair Housing Issues/ Impediments	Contributing Factors	Recommended Actions to be Taken	Responsible Agency
Segregation	Moderate to high levels of segregation	Contract with a Fair Housing Initiate Program (FHIP) participant or other entity to conduct testing and enforcement activities in the non-entitlement areas of Alabama. Record activities annually.	ADECA
R/ECAPs	Access to low poverty areas and concentrations of poverty Moderate to high levels of segregation Discriminatory pattern sin Lending	Review opportunities annually to increase funding sources for additional low-income housing outside R/ECAPs	ADECA
Disparities in Access to Opportunity	Access to low poverty areas and concentrations of poverty Access to labor market engagement Access to School Proficiency	Review opportunities annually to increase funding sources for additional low-income housing outside R/ECAPs	ADECA
Disproportionate Housing Need	Insufficient affordable housing in a range of unit sizes Black and Hispanic households with disproportionate rates of housing problems Discriminatory patterns in Lending	Conduct outreach and education for both housing providers and housing consumers on prospective actions that are in violation of fair housing law, in partnership with state FHIP grantees. Record activities annually. Review opportunities annually to increase funding sources for additional low-income housing outside R/ECAPs	ADECA
Disability and Access	Insufficient accessible affordable housing Failure to Make Reasonable Accommodations	Conduct outreach and education for both housing providers and housing consumers on prospective actions that are in violation of fair housing law. Record activities annually. Conduct audit testing to determine the number of properties currently in violation of disability standards. Record activities annually.	ADECA
Fair Housing Enforcement and Outreach	Insufficient fair housing education Insufficient understanding of credit Insufficient fair housing infrastructure Discriminatory patterns in lending	Continue to promote fair housing education through annual or biannual workshops. Promote annual outreach and education related to credit for prospective homebuyers. Conduct outreach and education for both housing providers and housing consumers on prospective actions that are in violation of fair housing law, in partnership with state FHIP grantees. Record activities annually. Contract with a Fair Housing Initiate Program (FHIP) participant or other entity to conduct testing and enforcement activities in the non-entitlement areas of Alabama. Record activities annually. Continue to publish fair housing information on ADECA's website. Review annually. Continue to use of mandating local communities to use the *Suggested Assessment Guide for Community Assessment of Fair Housing.* Record activities annually. Continue fair housing training for CDBG grantees in annual workshops. Record annually.	ADECA

Section II. Community Participation Process

The following section describes the community participation process undertaken for the 2020 State of Alabama Analysis of Impediments to Fair Housing Choice.

A. Overview

The outreach process included the 2019 Fair Housing Survey, Fair Housing Forums, and a public review meeting.

The Fair Housing Survey was distributed as an internet outreach survey, as well as being made available as a printed version. As of the date of this document, 115 responses have been received.

The Fair Housing Forums were held on December 17th, 2019 and March 4, 2020 in order to gather feedback and input from members of the public.

The Draft for Public Review AI was made available on February 18th, 2020 and a 30-day public input period was initiated.

A public hearing was held on March 4, 2020 during the public review period of February 18, 2020 to March 18, 2020 in order to gather feedback and input on the draft Analysis of Impediments. After the close of the public review period and inspection of comments received, the final draft was made available in late March 2020.

B. The 2019 Fair Housing Survey

The purpose of the survey, a relatively qualitative component of the AI, was to gather insight into knowledge, experiences, opinions, and feelings of stakeholders and interested citizens regarding fair housing as well as to gauge the ability of informed and interested parties to understand and affirmatively further fair housing. Many individuals and organizations throughout the State of Alabama invited to participate. At the date of this document, some 115 responses were received. A complete set of survey responses can be found in ***Section IV.I Fair Housing Survey Results***.

C. Fair Housing Forum

A Fair Housing Forum was held on December 17th, 2019. The complete transcript from this meeting will be included in the Appendix.

D. The Final Public Review Process

A 30-day public review process was held from February 18, 2020 through March 18, 2020. It included a public review meeting on March 4, 2020. A summary of the comments received during this meeting will be included below. The complete transcript from this meeting will be included in the Appendix.

Section III. Assessment of Past Goals and Actions

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

A. Past Impediments and Actions

The conclusions of the 2015 Analysis of Impediments are included below:

Private Sector Impediments, Suggested Actions, and Measurable Objectives

***Impediment 1*: More frequent denial of home purchase loans to black, Hispanic, and female householders.** This impediment was identified through review of data on home purchase loans gathered under the Home Mortgage Disclosure Act. These data include information on the purpose of the loan; the loan amount; the occupancy status of the prospective unit; the race, sex, and ethnicity of the applicant; the outcome of the loan application; reasons for loan denials; the income of the applicant; and whether or not the loan is a high-interest rate loan. The data provide an index of the experience of loan applicants, and allow for a determination of whether or not those applicants are more or less likely to be denied if they are black, Hispanic, or female.

According to these data, the average black loan applicant in the state's non-entitlement areas was almost twice as likely to be denied a home purchase loan as the average white loan applicant. Similarly, 30.7 percent of loan applications from female applicants were denied, compared to a denial rate of 22 percent for male applicants, and the denial rate for Hispanic applicants, 29.6 percent, exceeded that of non-Hispanic applicants by over six percentage points. These data do not necessarily indicate that lenders throughout the state have engaged in a pattern of illegal discriminatory lending; however, differential denial rates do present an impediment to those in protected classes who are subject to higher denial rates.

Action 1.1: Conduct outreach and education of prospective housing consumers on how to acquire and keep good credit.

Measurable Objective 1.1: Number of outreach and education activities undertaken and number of participants in those activities.

***Impediment 2*: Apparent predatory lending falls more heavily on black borrowers.** This impediment was identified through review of data gathered under the HMDA, which related in part to the prevalence of high annual percentage rate loans (HALs) among home purchase loans issued in non-entitlement areas of the state. According to these data, over one quarter of the loans issued to black borrowers in the state's non-entitlement areas were HALs, compared to a HAL rate of 16.3 percent for white borrowers and an overall HAL rate of 17.3 percent. These HALs indicate the proportion of persons carrying a higher risk of foreclosure, with black borrowers carrying a higher share of such loans.

Action 2.1: Conduct outreach and education of prospective housing consumers on the attributes of a predatory style loan.

Measurable Objective 2.1: Number of outreach and education activities undertaken and number of participants in those activities.

***Impediment 3*: Discriminatory terms, conditions, privileges, or facilities relating to rental.** This impediment was identified through review of fair housing complaints lodged with the U.S. Department of Housing and Urban Development (HUD), the 2014 Real Estate Professionals Focus Group, and cases lodged by the DOJ against state housing providers on behalf of Alabama residents. Fair housing complaints pertaining to perceived discrimination in the rental housing market were the most common type of complaint with respect to the discriminatory action alleged complaints; this was true for all complaints in general as well as those considered to have cause. In addition, participants in the rental focus group discussion perceived discrimination to be more pronounced in the rental market than in the real estate market. The relative prevalence of discrimination in the rental market was born out to some degree by DOJ cases filed in the state over the last decade, eleven of which concerned discrimination in the rental housing market (out of fifteen total).

Action 3.1: Conduct outreach and education for both housing providers and housing consumers on prospective actions that are in violation of fair housing law, in partnership with state FHIP grantees.

Measurable Objective 3.1: Number of outreach and education activities undertaken and number of participants in those activities.

***Impediment 4*: Discriminatory refusal to rent.** This impediment was identified through review of fair housing complaints submitted to HUD and the 2014 Real Estate Professionals Focus Group. Approximately fifteen percent of complaints cited discriminatory refusal to rent, specifically, and as noted above, complaints alleging violations of fair housing laws in the state's rental markets more generally were relatively common. In addition, participants in the rental focus group discussion perceived discrimination to be more pronounced in the rental market than in the real estate market. Finally, as stated above, eleven out of fifteen DOJ cases against housing providers in Alabama concerned discrimination in rental housing.

Action 4.1: Conduct outreach and education for both housing providers and housing consumers on prospective actions that are in violation of fair housing law.

Measurable Objective 4.1: Number of outreach and education activities undertaken and number of participants in those activities.

***Impediment 5*: Failure to make reasonable accommodation or modification.** This impediment was identified through review of fair housing cases lodged by the Department of Justice against housing providers in Alabama, complaints submitted to HUD by or on behalf of Alabama residents, and minutes from focus group discussions. Of the fifteen fair housing cases in Alabama that HUD referred to the Department of Justice over the last decade, six of them concerned housing discrimination on the basis of disability, with failure to make reasonable accommodation a common accusation. In addition, disability was cited as the discriminatory basis in 45 percent of all complaints lodged with HUD from 2004 through 2014, and failure to make reasonable accommodation was a specific allegation in more than one-fifth of all complaints. Among complaints considered to have cause, disability was the most common perceived basis for discrimination.

Action 5.1: Conduct outreach and education for both housing providers and housing consumers on prospective actions that are in violation of fair housing law.

Measurable Objective 5.1: Number of outreach and education activities undertaken and number of participants in those activities.

Action 5.2: Conduct audit testing to determine the number of properties currently in violation of disability standards.
Measurable Objective 5.2: Number of audit tests undertaken and properties identified as potentially in violation of disability standards.

***Impediment 6*: Insufficient understanding of fair housing laws.** This impediment was identified through review of the 2014 Impediments to Fair Housing Choice Survey and the 2014 Real Estate Professionals Focus Group. More than half of respondents considered "lack of knowledge or understanding regarding fair housing" to represent an impediment in the State of Alabama, and 30 percent classified it as a moderate or severe impediment. The lack of understanding regarding fair housing laws was also a subject in the Rental Focus Group. One respondent maintained that, due to a lack of fair housing training, "people have no idea… that [the fair housing law] is even there to protect them…"

Action 6.1: Enhance outreach and education by conducting more education opportunities for both consumers and providers of housing
Measurable Objective 6.1: Number of outreach and education activities undertaken and number of participants in those activities.
Action 6.2: Make available both the summary and the entire study, the 2015 Analysis of Impediments to Fair Housing Choice
Measurable Objective 6.2: Publication of the summary and study on ADECA's website.

Public Sector Impediments, Suggested Actions, and Measurable Objectives

***Impediment 1*: Insufficient fair housing testing and enforcement in non-entitlement areas of Alabama.** Three fair housing organizations in the state were contacted in connection with the AI effort, and asked to provide information relating to fair housing activities undertaken in non-entitlement areas of the state, including complaint intake and fair housing testing. None of these organizations provided information concerning complaints they had receive or testing they had conducted, or responded to these requests for information in any way, and one has lost its HUD funding and is largely inactive. The perception that fair housing enforcement in the state's non-entitlement areas was insufficient was shared in commentary at the Fair Housing Forum.

Action 1.1: Contract with a Fair Housing Initiate Program (FHIP) participant or other entity to conduct testing and enforcement activities in the non-entitlement areas of Alabama
Measurable Objective 1.1: Record of correspondence with FHIP participants or other entities, contracts entered into, and resources committed to testing and enforcement activities.
Action 1.2: Track the outcome of this testing activity
Measurable Objective 1.2: Number of tests undertaken and the results of such testing, concluding types of violations discovered, if any, and protected classes impacted by those violations.

***Impediment 2*: Lack of Fair Housing Initiative Program (FHIP) participation in non-entitlement areas of Alabama.** Though residents of southern and central Alabama appear to be served by the Center for Fair Housing and the Central Alabama Fair Housing Center, respectively, residents of northern Alabama are not currently served by a FHIP participant. The fair housing organization operating in that part of the state is not a current FHIP grantee. This organization does not currently

operate a website that would allow members of the public to learn more about its work, or fair housing in general, or to contact them directly with fair housing complaints. In addition, participation of FHIP grantees in the AI process was lacking: though the three fair housing organizations were contacted during the AI process, and were asked to provide information relating to their complaint intake and enforcement activities, none has done so.

Action 2.1: Contract with a Fair Housing Initiate Program (FHIP) participant or other entity to conduct testing and enforcement activities in the non-entitlement areas of Alabama

Measurable Objective2.1: Record of correspondence with FHIP participants or other entities, contracts entered into, and resources committed to testing and enforcement activities.

Action 2.2: Require periodic reporting of activities undertaken

Measurable Objective 2.2: Reports submitted by participating FHIP grantees, or other entities, to ADECA on a quarterly basis, and the number and type of fair housing activities undertaken in the state's non-entitlement areas

***Impediment 3*: Lack of understanding of the fair housing laws and duties.** This impediment was identified through review of the 2014 Impediments to Fair Housing Choice Survey. More than half of respondents considered "lack of knowledge or understanding regarding fair housing" to represent an impediment in the State of Alabama, and 30 percent classified it as a moderate or severe impediment. The lack of understanding regarding fair housing laws was also a subject in the Real Estate Professionals Focus Group. One respondent maintained that, due to a lack of fair housing training, "people have no idea… that [the fair housing law] is even there to protect them…"

Action 3.1: Form a task force to oversee the contracted FHIP entity or other entity

Measurable Objective 3.1: Formation of the task force

Action 3.2: Have the task force consider other things that ADECA can do to affirmatively further fair housing, particularly in light of budgetary constraints

Measurable Objective 3.2: Recommendations from the task force, developed in consultation with state FHIP grantees or other entities, on how to affirmatively further fair housing

Action 3.3: Have the task force meet quarterly to review the quarterly report from the FHIP and consider new business

Measurable Objective 3.3: Record and minutes of quarterly meetings

Action 3.4: Conduct outreach and education to both consumers and providers of housing

Measurable Objective 3.4: Number of outreach and education activities undertaken and the number of participants in those activities.

Action 3.5: Coordinate outreach activities during Fair Housing Month, April of each year

Measurable Objective 3.4: Record of outreach activities undertaken in partnership with state FHIP participants, or other entities

***Impediment 4:* Limited enforcement of the State of Alabama Fair Housing Law.** The State of Alabama Fair Housing Law (Ala. Code §24-8-1 *et seq.*) provides for a range of legal rights pertaining to fair housing, roughly corresponding to those provided for in the federal Fair Housing Act. In addition, the state Fair Housing Law establishes a procedure by which the State will accept complaints and investigate claims of discrimination in the housing market, and identifies the Alabama Department of Economic and Community Affairs (ADECA) as the agency responsible for

carrying out the provisions of the law. (The full text of the Alabama Fair Housing Law is included in **Appendix F**.)

However, the resources available to enable ADECA to enforce the state fair housing law are limited, particularly in light of the agency's responsibility to conduct the economic and community development activities that represent the core of its mission. Nevertheless, as the Alabama agency vested with the responsibility to provide recourse to those who feel that they been subjected to unlawful discrimination in the housing market, ADECA should seek avenues by which it may more actively promote the enforcement of the state's fair housing law. Such avenues should include closer coordination and cooperation with the state's Fair Housing Initiative Program Grantees and other fair housing organizations.

Action 4.1: Include language on ADECA's website noting that discrimination in the housing market is illegal under state as well as federal law, defining the classes that are protected under state law, examples of violations of the law, and who is covered under state law.

Measurable Objective 4.1: Inclusion of the language described above on the ADECA website

Action 4.2: Establish a process by which ADECA will accept complaints from those who feel that they have been subject to illegal discrimination in the housing market, advertise how the process works, and include housing complaint forms on ADECA's website notifying residents where to file and who to contact.

Measurable Objective 4.2: Development of complaint process, publication of complaint process on ADECA's website, including web links to complaint forms

Action 4.3: Establish a procedure for investigation of fair housing complaints, or partnerships with non-profit fair housing organizations to that end, within the limits of the State Fair Housing Law. Document this process on the ADECA website.

Measurable Objective 4.3: Establishment and documentation of the procedure

FAIR HOUSING ACTIVITIES

ADECA has continued to work with the Alabama Realtors Association, the Alabama Center for Real Estate (ACRE), and the Alabama State Banking Commission (via face-to-face meetings, discussions, training sessions, continuing education seminars, etc.) so as to assist with monitoring and educating financial institutions on discriminatory practices.

ADECA has continued to work with the Alabama Realtors Association, the Alabama Center for Real Estate (ACRE), the Alabama State Banking Commission, and local governments (via face-to-face meetings, discussions, training sessions, continuing education seminars, etc.) so as to assist with promoting education and advocacy efforts to overcome local impediments or barriers to fair housing choice.

At the local level, Alabama provides information on compliance with federal and state fair housing laws through education and outreach to housing providers and housing consumers throughout the State. This information includes fair housing laws (particularly those pertaining to discriminatory terms and refusal to rent aspects and other conditions, privileges, or facilities relating to rental housing), and disability access laws (particularly those pertaining to rental housing with respect to

discrimination, and facilities' reasonable accommodations and modifications). Alabama makes available to the public the State of Alabama's "Analysis of Impediments to Fair Housing Choice" by posting the AI on the ADECA website at www.adeca.alabama.gov.

Alabama also continues to correspond with/work with the three Fair Housing Centers in the State (the Fair Housing Center of Northern Alabama located in Birmingham, the Central Alabama Fair Housing Center located in Montgomery, and the Mobile Fair Housing Center located in Mobile) and other fair housing entities (such as those who work with the Hispanic population and the Asian population, and those who work with special needs populations including the disabled and the elderly residents) to keep actively engaged with them and their targeted populations within the local communities so that they are periodically providing to ADECA - through their local governments - information on housing/community/economic development issues and resolution efforts. Alabama also observes the month of April as Fair Housing Month within the State in that ADECA obtains an annual proclamation from the Governor's Office declaring the month of April as Fair Housing Month in Alabama. ADECA annually distributes fair housing posters to local governments, grant administrators, housing providers, and interested consumers/members of the public throughout the State. ADECA also emphasizes Fair Housing Month activities at its annual CDBG grant application workshop and CDBG grant compliance workshop.

ADECA has also instituted new fair housing compliance methods for local governments who are CDBG grant recipients. In conjunction with the 2015-2019 Five-Year Consolidated Plan, ADECA issued the "April 15, 2015 Fair Housing and Equal Opportunity Information" memorandum (included below). This memorandum was subsequently issued in April 2016, April 2017, April 2018, and again in April 2019 to continue ADECA's fair housing efforts with its local government grant recipients. Per this memorandum, beginning with the PY2015 CDBG grants, the local government grant recipients are required to implement two activities (issue a "Fair Housing Month" proclamation during the month of April, and publish and/or display bilingual fair housing information for non-English speaking residents in the community) as well as implement at least two additional fair housing activities (listed in the memorandum) with the intent that these activities provide assistance in satisfying the requirements of the federal Fair Housing Act. ADECA also mandates that each CDBG-funded community document the fair housing actions that are implemented, those documents are to be retained in the community's CDBG Program file, and that file must be made available to the public in an accessible format. ADECA also monitors each funded community for compliance with the fair housing and equal opportunity requirements.

Section IV. Fair Housing Analysis

This section presents demographic, economic, and housing information that is drawn from the 2010 Census and American Community Survey (ACS) estimates unless otherwise noted. This analysis uses ACS Data to analyze a broad range of socio-economic characteristics, including population growth, race, ethnicity, disability, employment, poverty, and housing trends; these data are also available by Census tract, and are shown in geographic maps. Ultimately, the information presented in this section illustrates the underlying conditions that shape housing market behavior and housing choice in the Non-Entitlement Areas of Alabama.

Lead Agency and Service Area

Alabama Department of Economic and Community Affairs is the lead agency undertaking this Analysis of Impediments to Fair Housing Choice.

This AI addresses the status of fair housing within non-entitlement areas of the State of Alabama. As such, data from the entitlement cities of Anniston, Auburn, Bessemer, Birmingham, Decatur, Dothan, Florence, Gadsden, Hoover, Huntsville, Mobile, Montgomery, Opelika, and Tuscaloosa are excluded from this analysis, along with Jefferson and Mobile County.

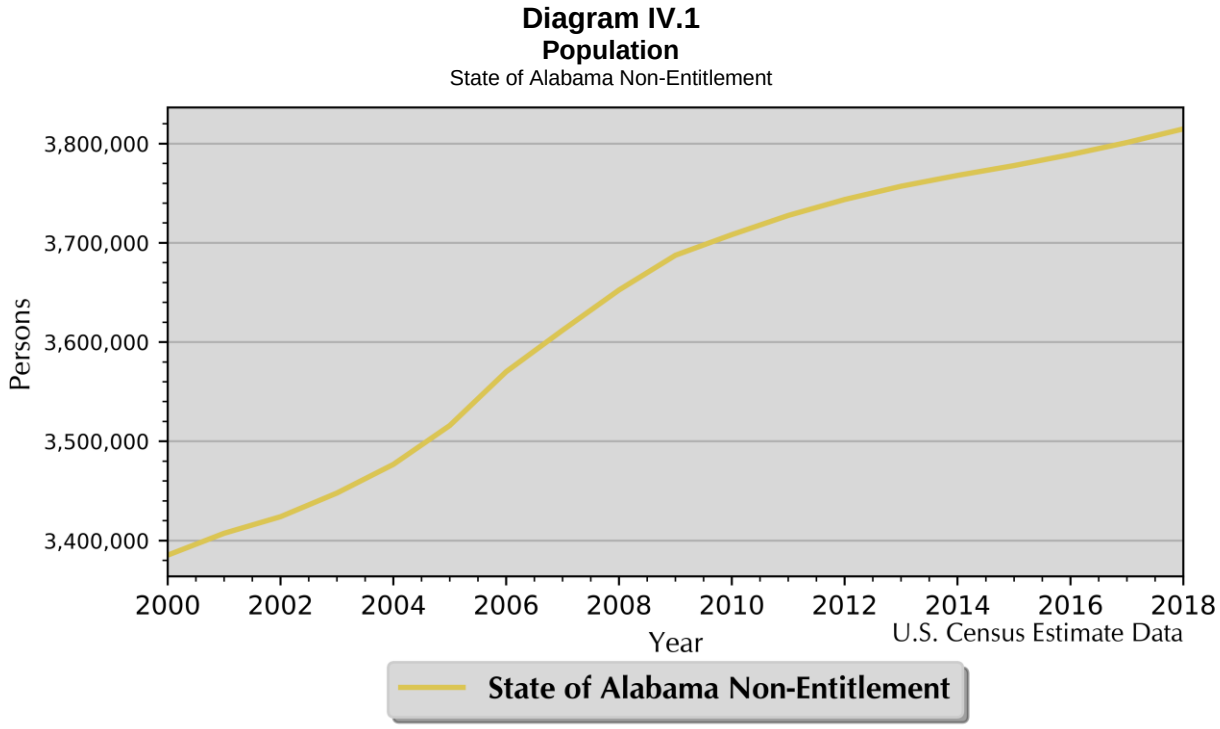
A. Socio-Economic Overview

Demographics

The Census Bureau's current census estimates for each year since the 2010 Census are presented in Table IV.1. The 2018 estimates indicate that the State of Alabama Non-Entitlement's population increased from 3,708,278 in 2010 to 3,814,814 in 2018, or by 3.0 percent. The 2018 population estimate is not yet available broken down by race, age, or gender. For those purposes, we will use the 2017 five-year ACS estimates. Population trends for The State of Alabama Non-Entitlement Areas since 2000 are displayed on the following page in Diagram IV.1.

Table IV.1
Population Estimates
State of Alabama Non-Entitlement
2010-2018 Census Data and Intercensal Estimates

2010 Census	**3,708,278**
2011 Population Estimate	3,727,619
2012 Population Estimate	3,743,675
2013 Population Estimate	3,757,054
2014 Population Estimate	3,767,973
2015 Population Estimate	3,777,855
2016 Population Estimate	3,788,920
2017 Population Estimate	3,801,059
2018 Population Estimate	**3,814,814**



Population Estimates

The Census Bureau's current estimates indicate that the State of Alabama Non-Entitlement's population increased from 4,779,736 in 2010 to 4,887,871 in 2017, or by 2.3 percent. This compares to a statewide population change of 2.3 percent over the period. The number of people from 25 to 34 years of age increased by 5.7 percent, and the number of people from 55 to 64 years of age increased by 11.4 percent.

Between 2010 and 2018, the percent change in the State of Alabama Non-Entitlement population by race was white (0.5 percent), black (4.1 percent), American Indian and Alaskan Natives (4.5 percent), Asian (32.5 percent), Native Hawaiian or Pacific Islanders (0.0 percent), two or more races (31.2 percent), and Hispanic or Latino (17.0 percent). Over the same period, the percent change in the Alabama population by race was white (0.5 percent), black (4.1 percent), American Indian and Alaskan Natives (4.5 percent), Asian (32.5 percent), Native Hawaiian or Pacific Islanders (0.0 percent), two or more races (31.2 percent), and Hispanic or Latino (17.0 percent). These data are presented in Table IV.2.

Table IV.2
Profile of Population Characteristics
State of Alabama Non-Entitlement vs. State of Alabama
2010 Census and 2018 Current Census Estimates

Subject	State of Alabama Non-Entitlement			Alabama		
	2010 Census	Jul-18	% Change	2010 Census	Jul-18	% Change
Population	**4,779,736**	**4,887,871**	**2.3%**	**4,779,736**	**4,887,871**	**2.3%**
Age						
Under 14 years	932,841	901,598	-3.3%	932,841	901,598	-3.3%
15 to 24 years	678,793	640,900	-5.6%	678,793	640,900	-5.6%
25 to 34 years	608,922	643,540	5.7%	608,922	643,540	5.7%
35 to 44 years	619,501	592,302	-4.4%	619,501	592,302	-4.4%
45 to 54 years	693,854	627,458	-9.6%	693,854	627,458	-9.6%
55 to 64 years	588,033	655,179	11.4%	588,033	655,179	11.4%
65 and Over	657,792	826,894	25.7%	657,792	826,894	25.7%
Race						
White	3,362,877	3,379,955	0.5%	3,362,877	3,379,955	0.5%
Black	1,259,224	1,310,802	4.1%	1,259,224	1,310,802	4.1%
American Indian and Alaskan Native	32,903	34,375	4.5%	32,903	34,375	4.5%
Asian	55,240	73,167	32.5%	55,240	73,167	32.5%
Native Hawaiian or Pacific Islander	5,208	5,207	0.0%	5,208	5,207	0.0%
Two or more races	64,284	84,365	31.2%	64,284	84,365	31.2%
Ethnicity (of any race)						
Hispanic or Latino	185,602	217,181	17.0%	185,602	217,181	17.0%

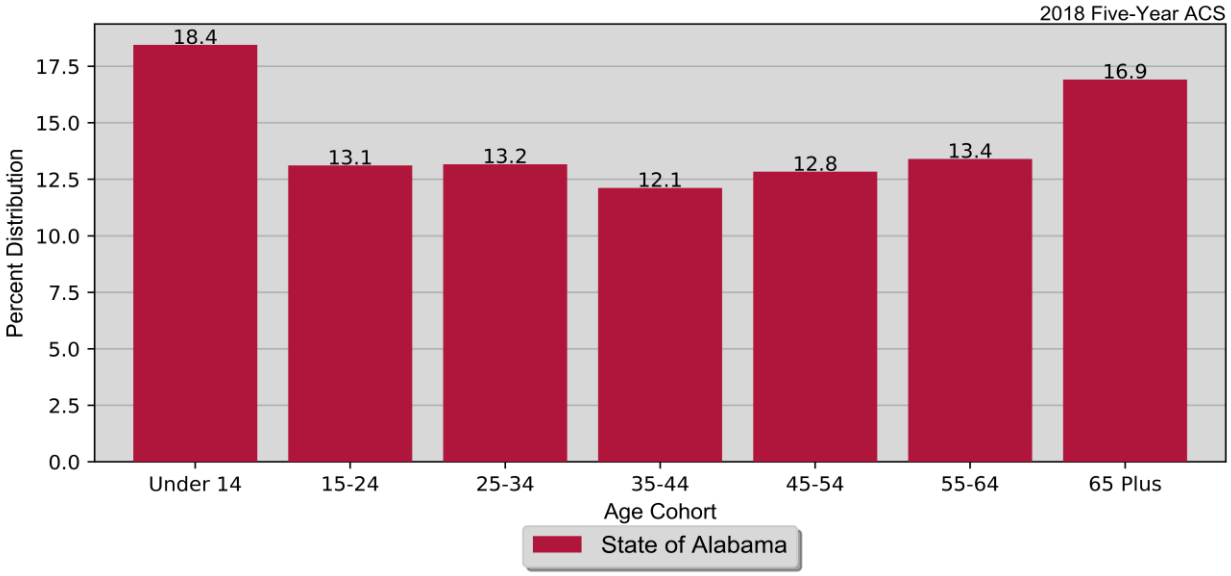
Table IV.3 presents the population of the State of Alabama Non-Entitlement by age and gender from the 2010 Census and 2017 current census estimates. The 2010 Census count showed a total of 2,320,188 males, who accounted for 48.5 percent of the population, and the remaining 51.5 percent, or 2,459,548 persons, were female. In 2017, the number of males rose to 2,364,115 persons, and accounted for 48.4 percent of the population, with the remaining 51.6 percent, or 2,523,756 persons being female.

Table IV.3
Population by Age and Gender
State of Alabama Non-Entitlement
2010 Census and Current Census Estimates

Age	2010 Census			2018 Current Census Estimates			% Change 10-18
	Male	Female	Total	Male	Female	Total	
Under 14 years	476,022	456,819	932,841	459,608	441,990	901,598	-3.3%
15 to 24 years	342,671	336,122	678,793	323,639	317,261	640,900	-5.6%
25 to 44 years	300,140	308,782	608,922	317,397	326,143	643,540	5.7%
45 to 54 years	303,785	315,716	619,501	286,938	305,364	592,302	-4.4%
55 to 64 years	337,828	356,026	693,854	304,355	323,103	627,458	-9.6%
65 and Over	281,236	306,797	588,033	311,555	343,624	655,179	11.4%
Total	**2,320,188**	**2,459,548**	**4,779,736**	**2,364,115**	**2,523,756**	**4,887,871**	**2.3%**
% of Total	48.5%	51.5%		48.4%	51.6%		

Diagram IV.2 displays the percentage of the population by age in the State of Alabama Non-Entitlement Area.

Diagram IV.2
Age Cohorts
State of Alabama Non-Entitlement



Census Demographic Data

Census data is presented in one of four Summary Files (SF). In the 1980, 1990, and 2000 decennial censuses, the Census Bureau released the full SF1 100 percent count data[7], along with additional tabulations including the one-in-six SF3 sample. The Census Bureau did not collect additional sample data such as the SF3 in the 2010 decennial census, so many important housing and income concepts are not available in the 2010 Census.

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

The Census Bureau collects race data according to U.S. Office of Management and Budget guidelines, and these data are based on self-identification. Ancestry refers to one's ethnic origin or descent, "roots," or heritage, or the place of birth of the person or the person's parents or ancestors before their arrival in the United States. Ethnic identities may or may not represent geographic areas. People may choose to report more than one race group and people of any race may be of any ethnic origin. Hispanic origin can be viewed as the heritage, nationality, lineage, or country of birth of the person or the person's parents or ancestors before arriving in the United States. People who identify as Hispanic, Latino, or Spanish may be any race.

The State of Alabama Non-Entitlement population by race and ethnicity is shown in Table IV.4. The white population increased by 0.5 percent, representing 76.8 percent of the population in 2017, compared with the black population, which increased by 4.1 percent and accounted for 18.5 percent of the population. The Hispanic population represented 4.2 percent of the population, which increased from 185,602 to 217,181 people between 2010 and 2017, or by 17.0 percent.

Table IV.4
Population by Race and Ethnicity
State of Alabama Non-Entitlement
2010 Census & 2017 Five-Year ACS

Race	2010 Census		2017 Five-Year ACS	
	Population	% of Total	Population	% of Total
White	2,236,906	76.7%	2,271,572	76.8%
Black	533,923	18.3%	547,642	18.5%
American Indian	19,733	0.7%	18,773	0.6%
Asian	20,694	0.7%	24,380	0.8%
Native Hawaiian/ Pacific Islander	1,800	0.1%	1,606	0.1%
Other	58,932	2.0%	38,815	1.3%
Two or More Races	44,310	1.5%	54,784	1.9%
Total	**2,916,298**	**100.0%**	**2,957,572**	**100.0%**
Non-Hispanic	2,803,261	96.1%	2,833,421	95.8%
Hispanic	113,037	3.9%	124,151	4.2%

The change in race and ethnicity between 2010 and 2017 is shown in Table IV.5. During this time, the total non-Hispanic population was 2,833,421 persons in 2017. The Hispanic population was 124,151.

Table IV.5
Population by Race and Ethnicity
State of Alabama Non-Entitlement
2010 Census & 2017 Five-Year ACS

Race	2010 Census		2017 Five-Year ACS	
	Population	% of Total	Population	% of Total
	Non-Hispanic			
White	2,192,860	78.2%	2,193,891	77.4%
Black	530,553	18.9%	544,643	19.2%
American Indian	18,312	0.7%	17,222	0.6%
Asian	20,331	0.7%	23,964	0.8%
Native Hawaiian/ Pacific Islander	1,200	0.0%	910	0.0%
Other	2,223	0.1%	3,610	0.1%
Two or More Races	37,782	1.3%	49,181	1.7%
Total Non-Hispanic	**2,803,261**	**100.0%**	**2,833,421**	**100.0%**
	Hispanic			
White	44,046	39.0%	77,681	62.6%
Black	3,370	3.0%	2,999	2.4%
American Indian	1,421	1.3%	1,551	1.2%
Asian	363.0	0.3%	416.0	0.3%
Native Hawaiian/ Pacific Islander	600	0.5%	696.0	0.6%
Other	56,709	50.2%	35,205	28.4%
Two or More Races	6,528	5.8%	5,603	4.5%
Total Hispanic	**113,037**	**100.0**	**124,151**	**100.0%**
Total Population	**2,916,298**	**100.0%**	**2,957,572**	**100.0%**

The concentration of black households are shown in Map IV.1, on the following page. Black households tended to be more heavily concentrated in the central and more rural parts of the State. These areas saw a disproportionate share of black households. A disproportionate share exists when any one racial or ethnic group in concentrated in an area at a rate at least ten (10) percentage points higher than the jurisdiction average. Many of these areas saw concentrations of black households at a rate above 75.6 percent, compared to the average of 18.5 percent in the Non-Entitlement Areas of the State.

The geographic distribution of Hispanic households is shown in Map IV.2. There are disproportionate shares of Hispanic households in the northeastern part of the State, as well as in areas around Birmingham and Montgomery.

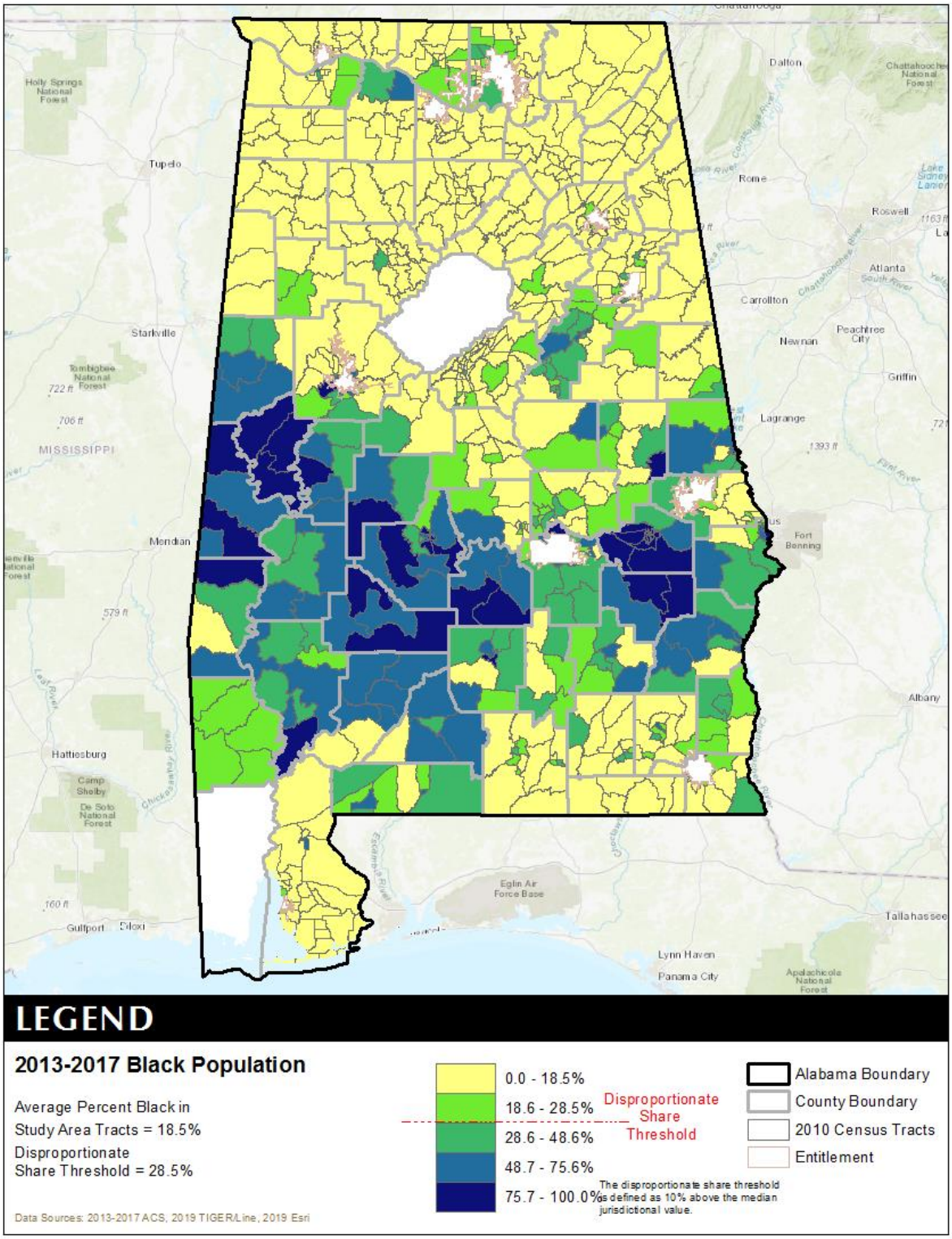
Group Quarters Population

The group quarters population includes the institutionalized population, who live in correctional institutions, juvenile facilities, nursing homes, and other institutions, and the non-institutionalized population, who live in college dormitories, military quarters, and other group living situations. As seen in Table IV.6, between 2000 and 2010, the institutionalized population changed 9.6 percent in the State of Alabama Non-Entitlement, from 41,749 people in 2000 to 45,765 in 2010. The non-institutionalized population changed -11.4%, from 14,545 in 2000 to 12,883 in 2010.

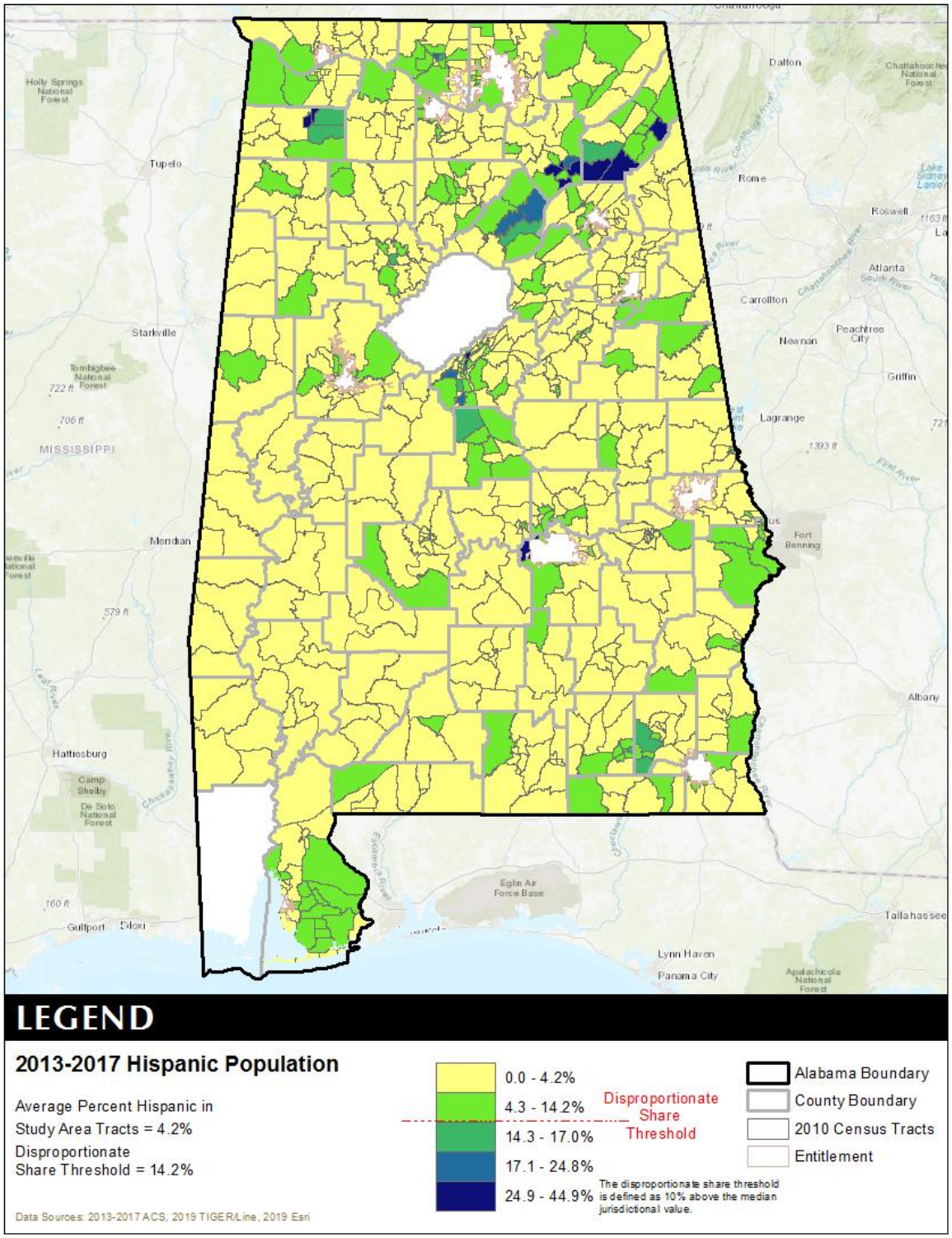
Table IV.6
Group Quarters Population
State of Alabama Non-Entitlement
2000 & 2010 Census SF1 Data

Group Quarters Type	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Institutionalized					
Correctional Institutions	24,065	57.6%	30,685	67.0%	27.5%
Juvenile Facilities	.	.	978	2.1%	.
Nursing Homes	15,503	37.1%	13,774	30.1%	-11.2%
Other Institutions	2,181	5.2%	328	0.7%	-85.0%
Total	**41,749**	**100.0%**	**45,765**	**100.0%**	**9.6%**
Non-institutionalized					
College Dormitories	7,455	51.3%	8,150	63.3%	9.3%
Military Quarters	1,793	12.3%	1,374	10.7%	-23.4%
Other Non-institutionalized	5,297	36.4%	3,359	26.1%	-36.6%
Total	**14,545**	**100.0%**	**12,883**	**100.0%**	**-11.4%**
Group Quarters Population	**56,294**	**100.0%**	**58,648**	**100.0%**	**4.2%**

Map IV.1
2017 Black Population
State of Alabama Non-Entitlement
2017 ACS, Tigerline



Map IV.2
2017 Hispanic Population
State of Alabama Non-Entitlement
2017 ACS, Tigerline



Foreign Born Populations

The number of foreign born persons are shown in Table IV.7. An estimated 1.1 percent of the population was born in Mexico, some 0.2 percent were born in Guatemala, and another 0.1 percent were born in Germany.

Table IV.7
Place of Birth for the Foreign-Born Population
State of Alabama Non-Entitlement
2017 Five-Year ACS

Number	Country	Number of Person	Percent of Total Population
#1 country of origin	Mexico	33,293	1.1%
#2 country of origin	Guatemala	7,109	0.2%
#3 country of origin	Germany	3,945	0.1%
#4 country of origin	China excluding Hong Kong and Taiwan	3,484	0.1%
#5 country of origin	India	3,340	0.1%
#6 country of origin	Korea	3,141	0.1%
#7 country of origin	Philippines	2,750	0.1%
#8 country of origin	Vietnam	2,516	0.1%
#9 country of origin	Canada	1,618	0.1%
#10 country of origin	Colombia	1,277	0.0%

The language spoken at home for those with Limited English Proficiency are shown in Table IV.8. An estimated 1.4 percent (38,904 people) of the population speaks Spanish at home, followed by 0.1 percent (2,417 people) speaking Chinese.

Table IV.8
Limited English Proficiency and Language Spoken at Home
State of Alabama Non-Entitlement
2017 Five-Year ACS

Number	Country	Number of Person	Percent of Total Population
#1 LEP Language	Spanish	38,904	1.4%
#2 LEP Language	Chinese	2,417	0.1%
#3 LEP Language	Korean	1,652	0.1%
#4 LEP Language	Other Indo-European languages	1,647	0.1%
#5 LEP Language	Vietnamese	1,412	0.1%
#6 LEP Language	Other Asian and Pacific Island languages	1,066	0.0%
#7 LEP Language	French, Haitian, or Cajun	802	0.0%
#8 LEP Language	German or other West Germanic languages	693	0.0%
#9 LEP Language	Tagalog	539	0.0%
#10 LEP Language	Other and unspecified languages	517	0.0%

Education and Employment

Education and employment data from the State of Alabama Non-Entitlement 2017 Five-Year ACS is presented in Table IV.9, Table IV.10, and Table IV.11. In 2017, 1,320,496 people were in the labor force, including 1,223,045 employed and 97,451 unemployed people. The unemployment rate for the State of Alabama Non-Entitlement was estimated at 7.4 percent in 2017.

Table IV.9
Employment, Labor Force and Unemployment
State of Alabama Non-Entitlement
2017 Five-Year ACS Data

Employment Status	2017 Five-Year ACS
Employed	1,223,045
Unemployed	97,451
Labor Force	**1,320,496**
Unemployment Rate	7.4%

Table IV.10 and Table IV.11 show educational attainment in the State of Alabama Non-Entitlement. In 2017, 85.2 percent of persons had a high school education or greater, including 33.5 percent with a high school diploma or equivalent, 31.2 percent with some college, 12.3 percent with a Bachelor's Degree, and 6.6 percent with a graduate or professional degree.

Table IV.10
High School or Greater Education
State of Alabama Non-Entitlement
2017 Five-Year ACS Data

Education Level	Households
High School or Greater	950,054
Total Households	1,115,144
Percent High School or Above	**85.2%**

Table IV.11
Educational Attainment
State of Alabama Non-Entitlement
2017 Five-Year ACS Data

Education Level	2017 5-year ACS	Percent
Less Than High School	372,219	16.3%
High School or Equivalent	765,431	33.5%
Some College or Associates Degree	713,555	31.2%
Bachelor's Degree	280,986	12.3%
Graduate or Professional Degree	151,802	6.6%
Total Population Above 18 years	**2,283,993**	**100.0%**

Commuting Patterns

Table IV.12 shows the place of work by county of residence. In 2010, 62.6 percent of residents worked within the county they reside with 31.9 percent working outside their home county. This compares to 62.0 percent of residents in 2017 who worked within the county in which they reside, and 31.9 percent of residents worked outside their home county but still within the state.

Table IV.12
Place of Work
State of Alabama Non-Entitlement
2010 and 2017 5 year ACS data

Place of work	2010 5-year ACS	% of Total	2017 5-year ACS	% of Total
Worked in county of residence	747,738	62.6%	750,093	62.0%
Worked outside county of residence	381,036	31.9%	385,228	31.9%
Worked outside state of residence	65,352	5.5%	74,067	6.1%
Total	**1,194,126**	**100.0%**	**1,209,388**	**100.0%**

Table IV.13 shows the aggregate travel time to work based on place of work and residence. In the State of Alabama Non-Entitlement Area, the total aggregate travel time was 30,730,525 minutes, with residents working in their home county spending a total of 13,794,295 minutes traveling.

Table IV.13
Aggregate Travel Time to Work (in Minutes)
State of Alabama Non-Entitlement
2010 & 2017 5 year ACS data

Place of Work	2010 5-year ACS	% of Total	2017 5-year ACS	% of Total
Worked in county of residence	13,344,970	44.8%	13,794,295	44.9%
Worked outside county of residence	13,976,385	46.9%	14,113,275	45.9%
Worked outside State of residence	2,465,850	8.3%	2,822,965	9.2%
Aggregate travel time to work (in minutes):	**29,787,190**	**100.0%**	**30,730,525**	**100.0%**

Table IV.14 shows the average travel time to work based on place of work and residence. In 2017 the overall aggregate travel time was 29,787,190 minutes. Residents working within their home county spent an average of 18.4 minutes commuting to work, with those working outside their county of residence spending an average of 36.6 minutes on their commute.

Table IV.14
Average Travel Time to Work (in Minutes)
State of Alabama Non-Entitlement
2010 & 2017 5 year ACS data

Place of Work	2010 5-year ACS	2017 5-year ACS
Worked in county of residence	17.8	18.4
Worked outside county of residence	36.7	36.6
Worked outside State of residence	37.7	38.1
Average travel time to work (in minutes):	**24.9**	**25.4**

Table IV.15 shows the means of transportation to work. In 2017, 86.5 percent of commuters drove alone in a car, truck, or van. Only 8.6 percent carpooled, with an additional 0.2 percent taking public transportation. Also, there were 35,515 persons or 2.9 percent who worked from home.

Table IV.15
Means of Transportation to Work
State of Alabama Non-Entitlement
2010 & 2017 5 year ACS data

Means	2010 5-year ACS	% of Total	2017 5-year ACS	% of Total
Car, truck, or van: Drove alone	1,000,063	83.7%	1,045,694	86.5%
Car, truck, or van: Carpooled:	134,148	11.2%	103,975	8.6%
Public transportation (excluding taxicab):	2,707	0.2%	1,865	0.2%
Taxicab	463	0.0%	353.0	0.0%
Motorcycle	2,314	0.2%	1,604	0.1%
Bicycle	643	0.1%	480	0.0%
Walked	13,804	1.2%	10,645	0.9%
Other means	9,512	0.8%	9,257	0.8%
Worked at home	30,472	2.6%	35,515	2.9%
Total	**1,194,126**	**100.0%**	**1,209,388**	**100.0%**

Table IV.16 shows the breakdown of the means of transportation by tenure. In 2017, 66.8 percent of commuters owned their home and commuted alone by car, which compares to 68.0 percent in 2010. There were also 239,561 renters who drove alone in 2017 and accounted for 19.9 percent of the total commuter population. Commuters who owned their own home and took public transportation represented 0.1 percent of the population, which compares to 600 renters, or 0.0 percent taking public transportation.

Table IV.16
Means Of Transportation To Work By Tenure
State of Alabama Non-Entitlement
2010 & 2017 5 year ACS data

Tenure	2010 5-year ACS	% of Total	2017 5-year ACS	% of Total
Car, truck, or van - drove alone:				
Owner	808,897	68.0%	804,563	66.8%
Renter	189,565	15.9%	239,561	19.9%
Car, truck, or van - carpooled:				
Owner	93,796	7.9%	73,666	6.1%
Renter	39,754	3.3%	29,931	2.5%
Public transportation (excluding taxicab):				
Owner	1,935	0.2%	1,202	0.1%
Renter	735	0.1%	600	0.0%
Walked:				
Owner	6,355	0.5%	5,883	0.5%
Renter	5,469	0.5%	3,543	0.3%
Taxicab, motorcycle, bicycle, or other means:				
Owner	8,933	0.8%	7,489	0.6%
Renter	3,932	0.3%	4,153	0.3%
Worked at home:				
Owner	25,901	2.2%	29,060	2.4%
Renter	3,889	0.3%	5,493	0.5%
Total:	**1,189,161**	**100.0%**	**1,205,144**	**100.0%**

Summary

While the population in the Non-Entitlement Areas of Alabama is growing, the racial and ethnic makeup of the area is not changing significantly. There are areas in the Non-Entitlement Areas of the State, however, that do see high concentrations of black and Hispanic residents. The population is also aging, with those aged 65 and older growing at the fastest rate in the Non-Entitlement Areas of the State. Limited English Proficiency includes an estimated 1.4 percent (38,904 people) of the population speaks Spanish at home, followed by 0.1 percent speaking Chinese, Korean, Vietnamese, or Other Indo-European languages. In 2017, some 85.2 percent of persons had a high school education or greater, including 33.5 percent with a high school diploma or equivalent, 31.2 percent with some college, 12.3 percent with a Bachelor's Degree, and 6.6 percent with a graduate or professional degree.

Economics

Labor Force

Table IV.17 shows labor force statistics for the State of Alabama Non-Entitlement between 1990 and 2018. The unemployment rate in the State of Alabama Non-Entitlement was 3.9 percent in 2018, with 50,989 unemployed persons and 1,322,785 in the labor force. The statewide unemployment rate in 2018 was 3.9 percent. In 2017, 1,253,835 people were employed, 57,102 were unemployed, and the labor force totaled 1,310,937 people.

Table IV.17
Labor Force Statistics
State of Alabama Non-Entitlement
1990 - 2018 BLS Data

Year	State of Alabama Non-Entitlement				Statewide Unemployment Rate
	Unemployment	Employment	Labor Force	Unemployment Rate	
1990	79,264	1,017,030	1,096,294	7.2%	6.8%
1991	87,479	1,016,425	1,103,904	7.9%	7.3%
1992	90,523	1,041,072	1,131,595	8.0%	7.6%
1993	89,073	1,067,475	1,156,548	7.7%	7.3%
1994	75,160	1,097,927	1,173,087	6.4%	6.2%
1995	75,080	1,126,207	1,201,287	6.2%	6.0%
1996	69,942	1,145,756	1,215,698	5.8%	5.2%
1997	67,196	1,175,192	1,242,388	5.4%	5.0%
1998	59,409	1,181,687	1,241,096	4.8%	4.4%
1999	63,692	1,181,138	1,244,830	5.1%	4.7%
2000	58,838	1,211,381	1,270,219	4.6%	4.6%
2001	65,833	1,192,310	1,258,143	5.2%	5.1%
2002	74,653	1,180,867	1,255,520	5.9%	5.9%
2003	75,497	1,192,564	1,268,061	6.0%	6.0%
2004	71,429	1,209,618	1,281,047	5.6%	5.7%
2005	58,022	1,233,333	1,291,355	4.5%	4.5%
2006	53,310	1,253,777	1,307,087	4.1%	4.0%
2007	53,136	1,255,822	1,308,958	4.1%	4.0%
2008	76,081	1,231,264	1,307,345	5.8%	5.7%
2009	148,064	1,153,095	1,301,159	11.4%	11.0%
2010	141,641	1,176,244	1,317,885	10.7%	10.5%
2011	127,935	1,190,274	1,318,209	9.7%	9.6%
2012	104,006	1,199,701	1,303,707	8.0%	8.0%
2013	94,680	1,209,272	1,303,952	7.3%	7.2%
2014	88,287	1,209,155	1,297,442	6.8%	6.8%
2015	78,056	1,215,184	1,293,240	6.0%	6.1%
2016	75,341	1,231,307	1,306,648	5.8%	5.8%
2017	57,102	1,253,835	1,310,937	4.4%	4.4%
2018	50,989	1,271,796	1,322,785	3.9%	3.9%

Diagram IV.3 shows the employment and labor force for the State of Alabama Non-Entitlement. The difference between the two lines represents the number of unemployed persons. In the most recent year, employment stood at 1,271,796 persons, with the labor force reaching 1,322,785, indicating there were a total of 50,989 unemployed persons

Diagram IV.3
Employment and Labor Force
State of Alabama Non-Entitlement

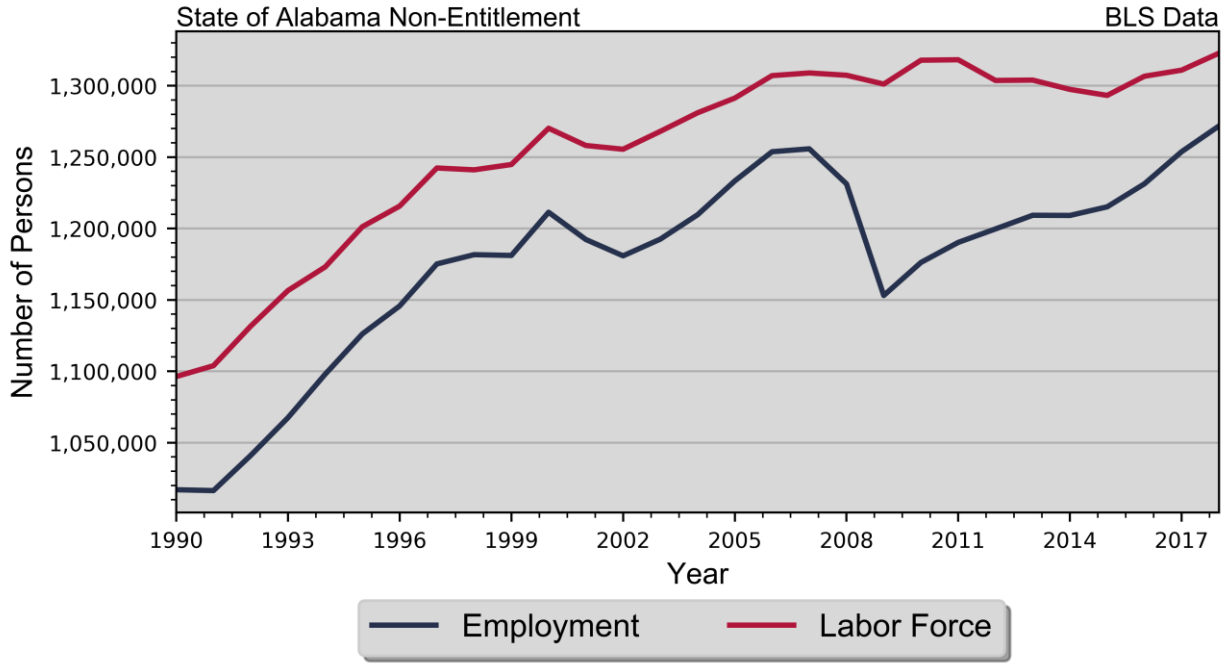
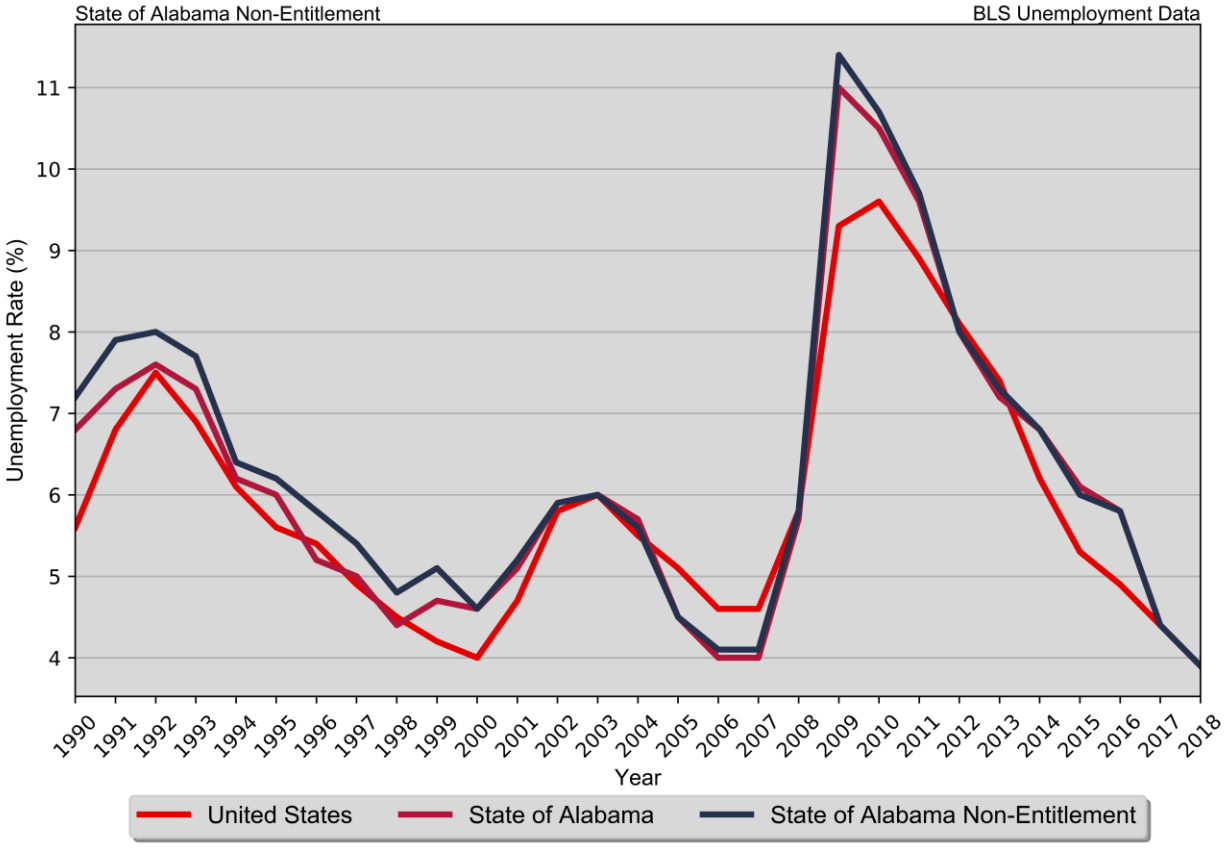


Diagram IV.4 shows the unemployment rate for both the State and the State of Alabama Non-Entitlement. During the 1990's the average rate for the State of Alabama Non-Entitlement was 6.4 percent, which compared to 6.0 percent statewide. Between 2000 and 2010 the unemployment rate had an average of 5.7 percent, which compared to 5.6 percent statewide. Since 2010, the average unemployment rate was 6.9 percent. Over the course of the entire period the State of Alabama Non-Entitlement had an average unemployment rate higher than the State, 6.3 percent for the State of Alabama Non-Entitlement, versus 6.2 statewide.

Diagram IV.4
Annual Unemployment Rate
State of Alabama Non-Entitlement
1990 – 2018 BLS Data



Earnings and Employment

The Bureau of Economic Analysis (BEA) produces regional economic accounts, which provide a consistent framework for analyzing and comparing individual state and local area economies. Table IV.18 shows total real earnings by industry for the State of Alabama Non-Entitlement. In 2017, the government and government enterprises industry had the largest total real earnings at $27,647,540,000. Between 2016 and 2017, the mining industry saw the largest percentage increase of 59.8 percent, to $455,091,000.

Table IV.18
Real Earnings by Industry
State of Alabama Non-Entitlement
BEA Table CA-5N Data (1,000's of 2017 Dollars)

NAICS Categories	2010	2011	2012	2013	2014	2015	2016	2017	% Change 16-17
Farm earnings	886,772	425,244	760,366	2,183,786	1,468,669	1,492,724	815,151	1,268,866	55.7
Forestry, fishing, related activities, and other	524,665	495,066	531,678	513,509	552,434	588,718	619,409	620,114	0.1
Mining	709,739	871,782	930,715	920,900	849,132	593,863	284,803	455,091	59.8
Utilities	1,770,494	1,922,229	1,816,111	1,866,342	1,849,806	1,976,966	2,064,497	1,979,473	-4.1
Construction	7,763,499	7,700,255	8,245,605	7,811,716	7,666,840	7,582,894	7,753,975	7,981,639	2.9
Manufacturing	16,705,995	16,696,608	17,052,249	17,418,599	18,132,500	18,646,568	18,788,887	19,035,808	1.3
Wholesale trade	5,744,988	5,872,487	5,770,897	5,870,753	5,864,620	6,071,949	5,981,778	6,057,845	1.3
Retail trade	8,037,070	8,126,318	8,218,151	8,228,278	8,244,171	8,423,217	8,553,408	8,550,100	-0.0
Transportation and warehousing	3,917,141	4,180,812	4,040,321	4,018,479	4,063,445	4,242,250	4,342,795	4,573,965	5.3
Information	1,841,261	1,791,722	1,724,582	1,662,082	1,705,768	1,677,382	1,592,723	1,613,695	1.3
Finance and insurance	6,396,668	6,270,531	6,237,001	6,361,033	6,567,266	6,857,645	6,849,628	7,143,792	4.3
Real estate and rental and leasing	769,719	906,036	1,097,486	1,508,812	1,722,772	1,877,585	2,070,815	2,152,565	3.9
Professional and technical services	10,090,743	10,252,222	10,236,896	10,226,150	10,313,132	10,723,394	10,910,174	11,430,392	4.8
Management of companies and enterprises	1,598,226	1,668,727	1,746,138	1,692,089	1,578,318	1,586,604	1,836,251	1,973,317	7.5
Administrative and waste services	4,290,590	4,469,411	4,570,613	4,573,590	4,676,627	4,744,064	4,730,773	4,994,661	5.6
Educational services	1,059,667	1,078,022	1,100,411	1,103,518	1,159,577	1,183,043	1,227,094	1,159,777	-5.5
Health care and social assistance	13,463,897	13,583,948	13,678,495	13,820,942	13,882,594	14,364,283	14,596,644	14,872,952	1.9
Arts, entertainment, and recreation	482,017	474,068	523,485	551,340	575,284	563,374	602,112	619,997	3.0
Accommodation and food services	3,114,918	3,251,977	3,501,809	3,579,313	3,722,416	3,865,588	4,017,437	4,116,973	2.5
Other services, except public administration	5,537,232	5,561,487	5,665,145	5,522,663	5,582,552	5,556,008	5,451,406	5,497,314	0.8
Government and government enterprises	28,239,655	27,927,433	26,915,034	26,382,889	26,647,317	27,092,257	27,387,783	27,647,540	0.9
Total	**122,944,957**	**123,526,383**	**124,363,189**	**125,816,785**	**126,825,242**	**129,710,376**	**130,477,541**	**133,745,875**	**2.5**

Table IV.19 shows the total employment by industry for the State of Alabama Non-Entitlement. The most recent estimates show the government and government enterprises industry was the largest employer in the State of Alabama Non-Entitlement, with employment reaching 403,174 jobs in 2017. Between 2016 and 2017 the mining industry saw the largest percentage increase, rising by 9.2 percent to 12,507 jobs.

Table IV.19
Employment by Industry
State of Alabama Non-Entitlement
BEA Table CA25 Data

NAICS Categories	2010	2011	2012	2013	2014	2015	2016	2017	% Change 16-17
Farm earnings	48,571	48,235	45,540	46,420	43,957	45,792	46,214	47,855	3.6
Forestry, fishing, related activities, and other	14,901	14,987	15,773	16,022	16,526	16,115	16,094	16,008	-0.5
Mining	11,996	11,931	14,009	13,629	13,045	12,994	11,457	12,507	9.2
Utilities	14,551	14,590	14,569	14,699	14,677	14,962	14,962	15,022	0.4
Construction	143,646	138,907	136,841	135,665	135,628	136,108	141,706	144,144	1.7
Manufacturing	244,202	246,344	252,491	258,984	262,511	267,837	271,200	275,024	1.4
Wholesale trade	78,777	79,995	80,219	81,027	85,179	86,425	81,742	81,296	-0.5
Retail trade	269,460	273,939	272,757	274,848	278,963	283,527	284,249	282,864	-0.5
Transportation and warehousing	69,347	71,718	73,608	75,210	76,483	78,807	78,961	80,022	1.3
Information	29,118	28,863	28,238	28,488	28,184	27,397	27,088	27,152	0.2
Finance and insurance	102,578	109,218	107,610	109,083	108,213	108,724	111,806	114,796	2.7
Real estate and rental and leasing	95,309	96,967	95,253	95,849	98,874	100,204	103,474	106,163	2.6
Professional and technical services	137,192	136,840	137,346	138,567	139,998	142,960	145,455	148,926	2.4
Management of companies and enterprises	16,846	17,432	18,389	17,559	17,167	17,441	19,768	19,548	-1.1
Administrative and waste services	153,402	163,211	165,522	165,872	170,841	171,822	176,015	178,221	1.3
Educational services	37,770	38,025	38,246	40,085	40,981	41,201	41,752	41,668	-0.2
Health care and social assistance	226,073	230,882	232,116	234,043	235,774	241,950	246,312	249,547	1.3
Arts, entertainment, and recreation	32,932	33,569	33,836	34,036	35,244	34,730	37,845	39,048	3.2
Accommodation and food services	162,419	166,116	170,136	175,352	180,642	186,439	192,740	196,914	2.2
Other services, except public administration	158,365	168,473	168,004	167,342	170,036	174,113	170,746	172,507	1.0
Government and government enterprises	412,843	407,691	403,175	400,558	399,968	398,700	401,407	403,174	0.4
Total	**2,460,298**	**2,497,933**	**2,503,678**	**2,523,338**	**2,552,891**	**2,588,248**	**2,620,993**	**2,652,406**	**1.2**

Table IV.20 shows the real average earnings per job by industry for the State of Alabama Non-Entitlement. These figures are calculated by dividing the total real earning displayed in Tables I.18 and Table.19, by industry. In 2017, the utilities industry had the highest average earnings reaching 131,772 dollars. Between 2016 and 2017 the farm industry saw the largest percentage increase, rising by 50.3 percent to 26,515 dollars.

Table IV.20
Real Earnings Per Job by Industry
State of Alabama Non-Entitlement
BEA Table CA5N and CA25 Data

NAICS Categories	2010	2011	2012	2013	2014	2015	2016	2017	% Change 16-17
Farm earnings	18,257	8,816	16,697	47,044	33,411	32,598	17,639	26,515	50.3
Forestry, fishing, related activities, and other	35,210	33,033	33,708	32,050	33,428	36,532	38,487	38,738	0.7
Mining	59,165	73,069	66,437	67,569	65,093	45,703	24,858	36,387	46.4
Utilities	121,675	131,750	124,656	126,971	126,034	132,132	137,983	131,772	-4.5
Construction	54,046	55,435	60,257	57,581	56,528	55,712	54,719	55,373	1.2
Manufacturing	68,411	67,778	67,536	67,257	69,073	69,619	69,281	69,215	-0.1
Wholesale trade	72,927	73,411	71,939	72,454	68,851	70,257	73,179	74,516	1.8
Retail trade	29,827	29,665	30,130	29,938	29,553	29,709	30,091	30,227	0.5
Transportation and warehousing	56,486	58,295	54,890	53,430	53,129	53,831	54,999	57,159	3.9
Information	63,234	62,077	61,073	58,343	60,523	61,225	58,798	59,432	1.1
Finance and insurance	62,359	57,413	57,959	58,314	60,688	63,074	61,264	62,230	1.6
Real estate and rental and leasing	8,076	9,344	11,522	15,742	17,424	18,738	20,013	20,276	1.3
Professional and technical services	73,552	74,921	74,534	73,799	73,666	75,010	75,007	76,752	2.3
Management of companies and enterprises	94,873	95,728	94,956	96,366	91,939	90,970	92,890	100,947	8.7
Administrative and waste services	27,970	27,384	27,613	27,573	27,374	27,610	26,877	28,025	4.3
Educational services	28,056	28,350	28,772	27,529	28,295	28,714	29,390	27,834	-5.3
Health care and social assistance	59,556	58,835	58,930	59,053	58,881	59,369	59,261	59,600	0.6
Arts, entertainment, and recreation	14,637	14,122	15,471	16,199	16,323	16,222	15,910	15,878	-0.2
Accommodation and food services	19,178	19,577	20,582	20,412	20,607	20,734	20,844	20,907	0.3
Other services, except public administration	34,965	33,011	33,720	33,002	32,832	31,910	31,927	31,867	-0.2
Government and government enterprises	68,403	68,501	66,758	65,865	66,624	67,951	68,229	68,575	0.5
Total	**49,972**	**49,451**	**49,672**	**49,861**	**49,679**	**50,115**	**49,782**	**50,424**	**1.3**

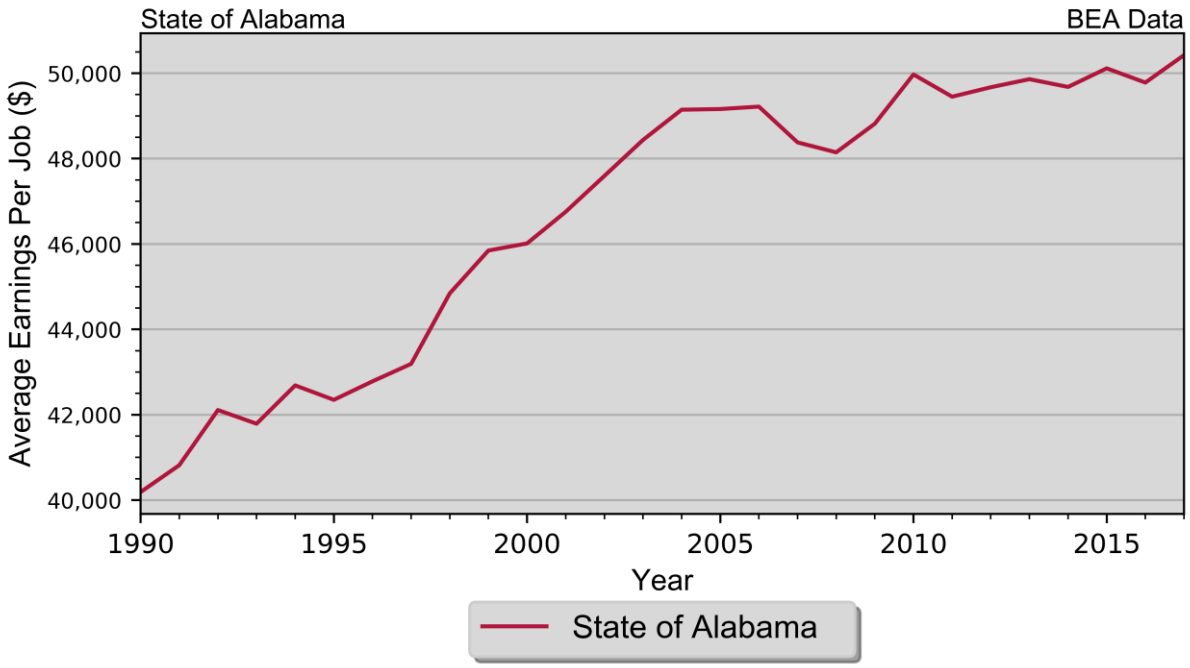
Table IV.21 shows total employment and real personal income for the years of 1969 to 2017. Total real personal income includes all wage and salary earnings, proprietorship income, dividends, interest, rents, and transfer payments. In 2017, total real personal income was $203,411,826,000, a 2.2 percent change between 2016 and 2017. Total employment was 2,460,298 in 2010 and 2,652,406 in 2017, a change of 1.2 percent over the period.

Table IV.21
Total Employment and Real Personal Income
State of Alabama Non-Entitlement
BEA Data 1969 Through 2017

Year	1,000s of 2017 Dollars						Per Capita Income	Total Employment	Average Real Earnings Per Job
	Earnings	Social Security Contributions	Residents Adjustments	Dividends, Interest, Rents	Transfer Payments	Personal Income			
1969	43,563,641	2,951,619	695,330	6,062,139	4,781,780	52,151,271	15,158	1,411,234	30,869
1970	44,004,114	3,004,501	638,610	6,772,918	5,586,471	53,997,612	15,652	1,412,928	31,146
1971	45,656,777	3,173,611	640,111	7,222,811	6,226,505	56,572,593	16,175	1,423,459	32,075
1972	48,835,239	3,554,199	765,276	7,521,705	6,647,431	60,215,453	17,009	1,470,523	33,209
1973	52,310,502	4,329,005	806,574	8,021,092	7,403,954	64,213,118	17,935	1,525,967	34,280
1974	52,447,794	4,590,117	785,984	8,589,269	8,124,117	65,357,046	18,016	1,552,266	33,790
1975	52,028,646	4,518,243	742,382	8,840,296	9,617,212	66,710,292	18,125	1,543,312	33,713
1976	56,084,641	4,984,627	752,531	9,063,964	9,986,362	70,902,871	18,973	1,593,952	35,188
1977	58,554,224	5,267,759	814,102	9,519,092	9,918,026	73,537,686	19,439	1,651,033	35,465
1978	62,274,138	5,674,302	822,322	10,193,691	10,081,533	77,697,382	20,265	1,712,582	36,361
1979	63,322,056	5,987,526	841,580	10,684,188	10,844,661	79,704,960	20,598	1,735,879	36,478
1980	62,002,838	5,945,428	856,708	11,977,514	11,693,851	80,585,483	20,661	1,731,866	35,802
1981	61,640,537	6,306,734	1,004,456	13,409,814	11,987,474	81,735,546	20,859	1,718,783	35,864
1982	59,858,342	6,251,856	998,241	14,244,179	12,476,437	81,325,343	20,719	1,687,466	35,473
1983	61,830,586	6,600,309	942,640	14,659,766	12,998,346	83,831,029	21,308	1,716,798	36,015
1984	66,047,990	7,152,394	970,862	15,879,284	13,254,921	89,000,664	22,521	1,779,584	37,114
1985	69,169,492	7,563,610	958,341	16,793,325	13,567,886	92,925,435	23,392	1,821,588	37,971
1986	72,088,384	7,877,145	997,638	17,375,495	13,841,259	96,425,632	24,158	1,858,269	38,792
1987	75,168,305	8,116,256	994,352	17,775,892	13,803,094	99,625,387	24,812	1,911,569	39,323
1988	78,501,019	8,726,133	966,736	18,860,250	13,927,267	103,529,140	25,729	1,969,768	39,852
1989	80,322,899	8,939,070	970,230	20,973,669	15,148,137	108,475,865	26,915	2,006,365	40,034
1990	82,298,955	9,302,514	923,646	21,078,984	16,079,924	111,078,994	27,427	2,047,865	40,187
1991	84,088,145	9,527,134	944,355	20,764,146	17,200,387	113,469,899	27,681	2,060,099	40,817
1992	88,319,092	9,938,595	1,006,939	20,948,944	19,105,214	119,441,594	28,754	2,097,425	42,109
1993	90,212,905	10,280,373	1,065,956	21,232,609	19,805,195	122,036,292	28,959	2,158,752	41,789
1994	93,055,537	10,739,967	1,189,660	22,438,559	20,574,229	126,518,018	29,697	2,180,001	42,686
1995	94,924,803	11,084,717	1,290,660	24,173,752	21,799,897	131,104,396	30,511	2,241,551	42,348
1996	97,330,471	11,257,591	1,276,596	24,391,169	22,625,036	134,365,680	31,024	2,275,108	42,781
1997	100,258,612	11,610,744	1,408,442	25,816,294	23,246,908	139,119,512	31,851	2,321,253	43,191
1998	105,880,979	12,064,594	1,563,372	27,465,762	23,441,484	146,287,004	33,211	2,361,174	44,843
1999	108,993,609	12,419,042	1,637,901	26,737,377	24,068,527	149,018,373	33,638	2,377,407	45,846
2000	110,103,079	12,563,300	1,780,194	28,279,697	25,095,005	152,694,676	34,297	2,392,880	46,013
2001	111,092,659	12,711,515	1,819,232	28,593,782	26,569,159	155,363,317	34,775	2,376,053	46,755
2002	112,550,752	12,916,300	1,871,463	27,340,654	27,991,354	156,837,922	35,007	2,364,828	47,594
2003	114,866,231	13,144,160	1,945,240	27,897,805	29,164,780	160,729,896	35,691	2,371,430	48,437
2004	119,210,708	13,451,075	1,938,193	29,736,142	30,083,147	167,517,115	36,973	2,425,649	49,146
2005	122,257,610	13,875,523	1,962,948	30,266,226	31,377,731	171,988,992	37,636	2,486,833	49,162
2006	125,288,052	14,299,532	1,973,966	31,847,371	32,802,907	177,612,765	38,370	2,545,556	49,218
2007	125,986,093	14,588,323	2,059,753	33,814,427	34,385,343	181,657,292	38,875	2,604,078	48,380
2008	124,344,454	14,757,659	2,147,129	34,953,911	37,671,246	184,359,082	39,074	2,582,591	48,147
2009	121,046,344	14,332,011	2,095,565	31,282,899	40,289,066	180,381,862	37,912	2,479,507	48,818
2010	122,944,957	14,597,361	2,167,803	31,884,035	43,618,169	186,017,603	38,870	2,460,298	49,971
2011	123,526,383	13,102,018	2,287,332	32,361,128	43,559,856	188,632,681	39,309	2,497,933	49,451
2012	124,363,189	13,119,616	2,532,134	33,664,566	42,898,457	190,338,729	39,539	2,503,678	49,672
2013	125,816,785	14,857,686	2,579,555	32,273,187	43,078,066	188,889,907	39,127	2,523,338	49,861
2014	126,825,242	14,982,879	2,522,882	33,474,107	44,027,239	191,866,592	39,641	2,552,891	49,680
2015	129,710,376	15,326,676	2,434,403	35,145,948	45,340,916	197,304,967	40,674	2,588,248	50,115
2016	130,477,541	15,429,086	2,522,920	35,500,973	45,939,002	199,011,349	40,944	2,620,993	49,782
2017	133,745,875	15,741,459	2,492,178	36,290,718	46,624,515	203,411,826	41,727	2,652,406	50,424

Diagram IV.5 shows real average earnings per job for the State of Alabama Non-Entitlement from 1990 to 2017. Over this period the average earning per job for the State of Alabama Non-Entitlement was 46,687 dollars, which was lower than the statewide average of 46,687 dollars over the same period.

Diagram IV.5
Real Average Earnings per Job
State of Alabama Non-Entitlement



Per capita income is a broader measure of wealth than real average earnings per job, which only captures the working population. Diagram IV.6 shows real per capita income for the State of Alabama Non-Entitlement from 1990 to 2017 of $35,400.

Quarterly Census of Employment and Wages

The BLS produces the Quarterly Census of Employment and Wages (QCEW), which reports monthly data on employment and quarterly data on wages and number of business establishments. QCEW employment data represent only filled jobs, whether full or part-time, temporary or permanent, by place of work the pay period. If data do not meet BLS or State agency disclosure standards they are displayed as (ND) and not disclosed. Data from this series are from the period of January 2006 through June 2019 and are presented in Table IV.22, with 2019 data being considered preliminary. Between 2017 and 2018, total annual employment increased from 1,936,819 persons in 2017 to 1,961,625 in 2018, a change of 1.3 percent.

Diagram IV.6
Real per Capita Income
State of Alabama Non-Entitlement

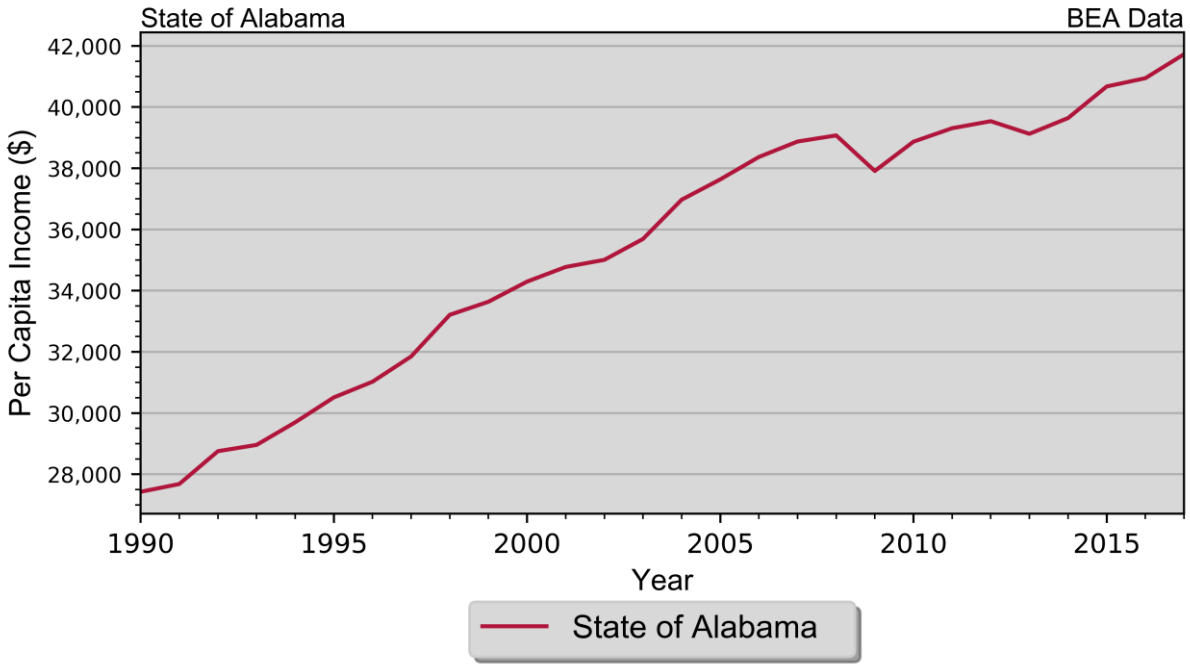


Table IV.22
Total Monthly Employment
State of Alabama Non-Entitlement
BLS QCEW Data, 2001–2018(p)

Period	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019(p)
Jan	1,781,960	1,781,552	1,792,586		1,827,805	1,852,589	1,881,542	1,902,835	1,920,931	1,955,921
Feb	1,785,819	1,795,047	1,803,516		1,833,319	1,863,201	1,891,642	1,916,520	1,936,145	1,968,951
Mar	1,802,394	1,809,150	1,822,261		1,849,342	1,872,924	1,902,421	1,928,087	1,947,435	1,976,648
Apr	1,814,999	1,818,220	1,831,556		1,862,944	1,887,032	1,920,041	1,934,313	1,958,068	1,986,566
May	1,830,712	1,821,785	1,837,223		1,870,239	1,897,134	1,922,133	1,940,581	1,962,401	1,992,107
Jun	1,832,379	1,824,741	1,842,269		1,874,093	1,899,809	1,923,534	1,947,225	1,971,977	1,993,680
Jul	1,813,479	1,805,952	1,817,441		1,856,219	1,887,412	1,911,347	1,930,604	1,956,628	
Aug	1,811,091	1,811,349	1,827,151		1,866,000	1,892,580	1,917,193	1,938,635	1,964,325	
Sep	1,814,577	1,822,467	1,833,423		1,871,498	1,896,079	1,924,805	1,942,328	1,967,108	
Oct	1,819,670	1,817,587	1,835,976		1,876,685	1,904,122	1,924,334	1,948,432	**1,977,256**	
Nov	1,825,672	1,826,182	1,847,995		1,884,164	1,912,631	1,931,331	1,956,946	**1,989,715**	
Dec	1,825,110	1,827,929	1,847,584		1,890,424	1,918,570	1,933,347	1,955,326	**1,987,509**	
Annual	**1,813,155**	**1,813,497**	**1,828,248**	**1,845,086**	**1,863,561**	**1,890,340**	**1,915,306**	**1,936,819**	1,961,625	
% Change	-0.9%	(ND)%	0.8%	0.9%	1.0%	1.4%	1.3%	1.1%	**1.3%**	

The QCEW also reports average weekly wages, which represents total compensation paid during the calendar quarter, regardless of when services were performed. The BLS QCEW data indicated average weekly wages were 885 dollars in 2017. In 2018, average weekly wages saw an increase of 3.1 percent over the prior year, rising to 912 dollars, or by 27 dollars. These data are shown in Table IV.23.

Table IV.23
Average Weekly Wages
State of Alabama Non-Entitlement
BLS QCEW Data, 2001–2018

Year	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	Annual	% Change
2002	589	586	589	632	599	3.5%
2003	612	603	607,	657	620	3.5%
2004	626	620	629	695	643	3.7%
2005	641	644	669	706	665	3.4%
2006	692	673	682	738	696	4.7%
2007	717	697	707	763	721	3.6%
2008	739	720	731	791	745	3.3%
2009	737	733	744	819	758	1.7%
2010	735	750	774	839	775	2.2%
2011	765	768	803	832	792	2.2%
2012	808	783	784	855	808	2%
2013					813	0.6%
2014	826	806	815	882	832	2.3%
2015	844	819	829	913	851	2.3%
2016	841	835	870	902	862	1.3%
2017	893	858	858	928	885	2.7%
2018	921	881	885	960	912	3.1%
2019(p)	945	911				

Total business establishments reported by the QCEW are displayed in Table IV.24. Between 2017 and 2018, the total number of business establishments in Alabama increased by 3.1 percent, from 124,881 to 127,260 establishments. The most recent preliminary 2018 estimates show there were 126,379 business establishments in the second quarter of 2018.

Table IV.24
Number of Business Establishments
State of Alabama Non-Entitlement
BLS QCEW Data, 2001–2018(p)

Year	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	Annual	% Change
2001	109,424	112,308	113,730	113,963	112,356	
2002	111,623	113,519	112,089	112,019	112,313	(ND)%
2003	110,312	110,906	111,574	112,096	111,222	-1%
2004	113,064	113,903	114,496	116,279	114,436	2.9%
2005	116,038	116,671	117,348	118,198	117,064	2.3%
2006	115,496	116,096	117,903	120,274	117,442	0.3%
2007	119,094	119,238	120,089	121,894	120,079	2.2%
2008	120,824	121,341	121,093	122,678	121,484	1.2%
2009	117,705	117,312	116,850	119,061	117,732	-3.1%
2010	116,031	116,232	116,523	118,525	116,828	-0.8%
2011	115,650	115,927	116,093	118,172	116,461	-0.3%
2012	114,985	115,408	116,221	118,318	116,233	-0.2%
2013					116,058	-0.2%
2014	116,272	117,167	117,243	119,125	117,452	1.2%
2015	117,333	118,371	119,375	121,924	119,251	1.5%
2016	120,632	121,684	122,463	124,462	122,310	2.6%
2017	122,888	124,100	125,237	127,297	124,881	2.1%
2018	125,635	126,379	127,492	129,532	127,260	1.9%
2019(p)	127,992	129,579				

Poverty

Poverty is the condition of having insufficient resources or income. In its extreme form, poverty is a lack of basic human needs, such as adequate and healthy food, clothing, housing, water, and health services. According to the Census Bureau's Small Area Income and Poverty Estimates Program, the number of individuals in poverty decreased from 883,078 in 2010 to 802,263 in 2017, with the poverty rate reaching 16.9 percent in 2017. This compared to a state poverty rate of 16.9 percent and a national rate of 13.4 percent in 2017. Table IV.25, at right, presents poverty data for the Non-Entitlement Areas of the State.

The rate of poverty for the State of Alabama Non-Entitlement is shown in Table IV.26. In 2017, there were an estimated 487,794 people (16.8 percent) living in poverty, compared to 15.5 percent living in poverty in 2000. In 2017, some 11.2 percent of those in poverty were under age 6 and 10.3 percent were 65 or older. This data is also displayed in Diagram IV.7 on the following page.

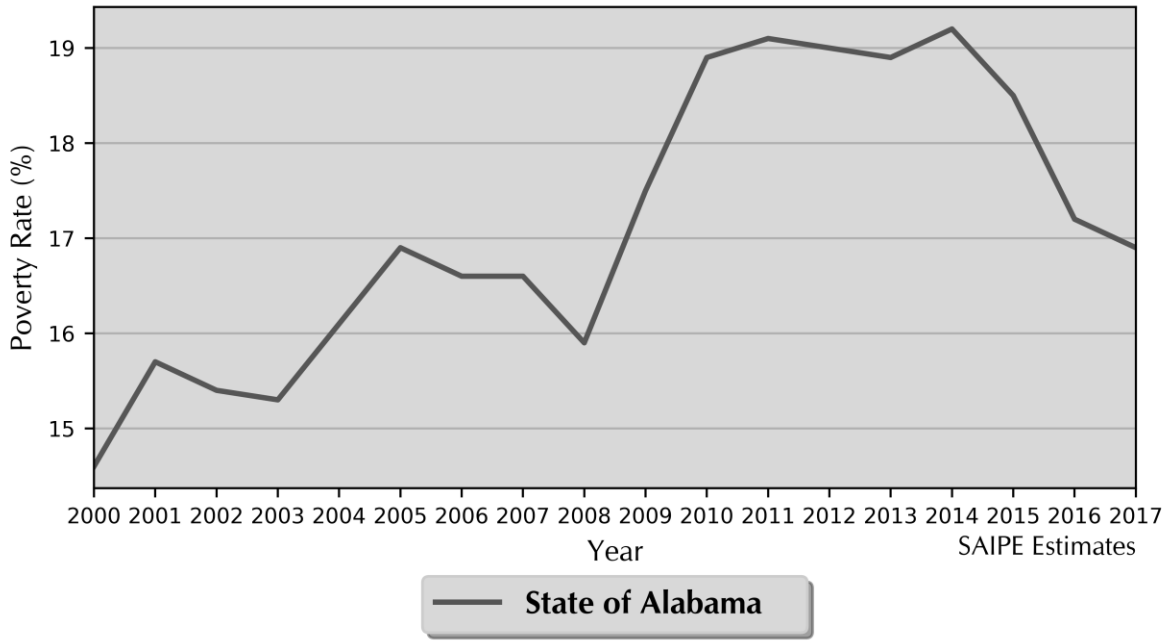
Table IV.25
Persons in Poverty
State of Alabama Non-Entitlement
2000–2017 SAIPE Estimates

Year	Persons in Poverty	Poverty Rate
2000	637,119	14.6%
2001	685,071	15.7%
2002	679,856	15.4%
2003	677,455	15.3%
2004	717,483	16.1%
2005	749,592	16.9%
2006	743,556	16.6%
2007	750,197	16.6%
2008	721,875	15.9%
2009	805,223	17.5%
2010	883,078	18.9%
2011	896,117	19.1%
2012	896,515	19%
2013	889,091	18.9%
2014	905,682	19.2%
2015	875,853	18.5%
2016	814,197	17.2%
2017	802,263	16.9%

Table IV.26
Poverty by Age
State of Alabama Non-Entitlement
2000 Census SF3 & 2017 Five-Year ACS Data

Age	2000 Census		2017 Five-Year ACS	
	Persons in Poverty	% of Total	Persons in Poverty	% of Total
Under 6	45,996	11.4%	54,723	11.2%
6 to 17	89,631	22.3%	105,816	21.7%
18 to 64	209,270	52.1%	277,041	56.8%
65 or Older	56,997	14.2%	50,214	10.3%
Total	**401,894**	**100%**	**487,794**	**100%**
Poverty Rate	**15.5%**	**.**	**16.8%**	**.**

Diagram IV.7
Poverty Rates
State of Alabama Non-Entitlement
SAIPE Estimates 2000 – 2017

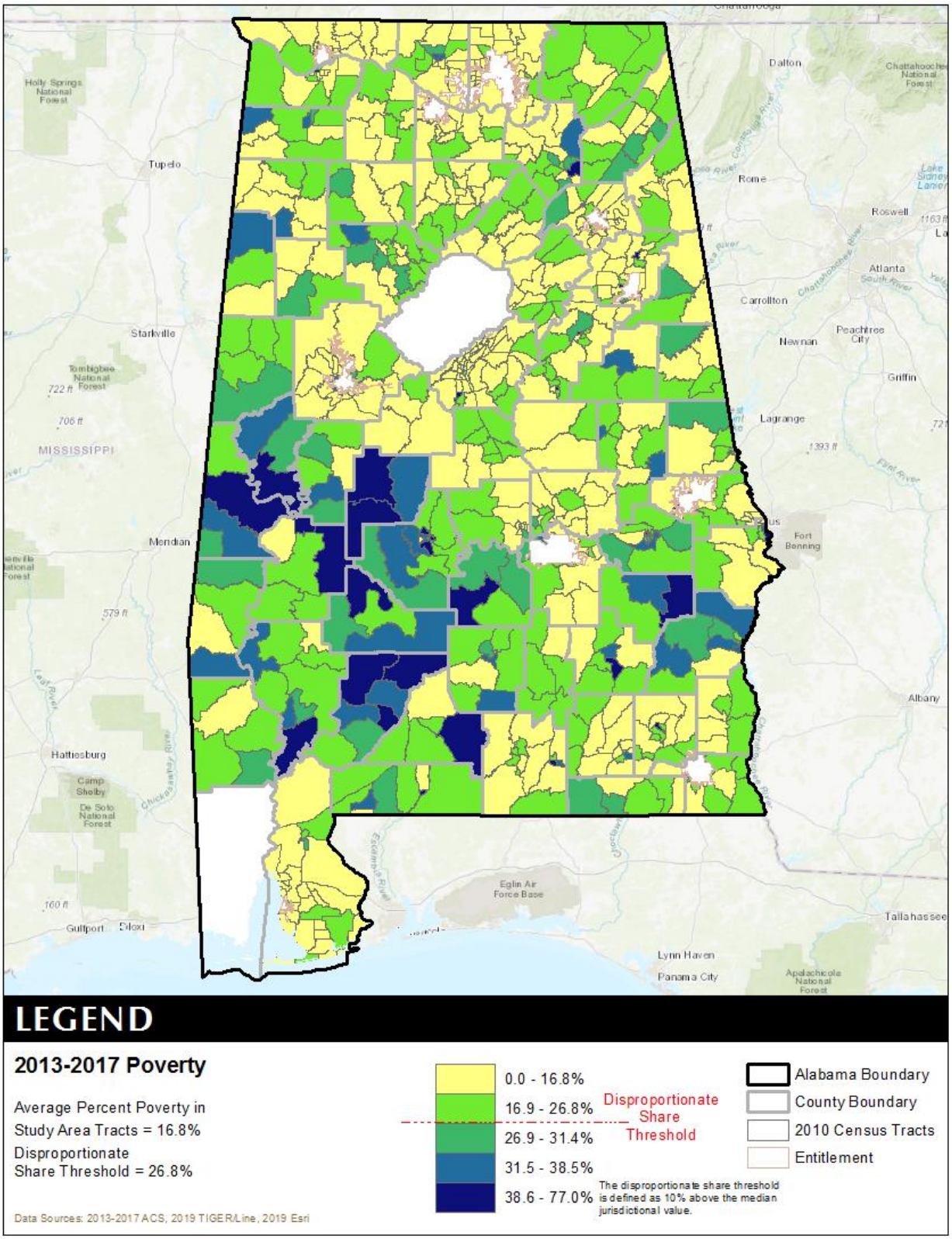


The geographic distribution of poverty is shown in Map IV.3, on the following page. Poverty was most heavily concentrated in the central and more rural parts of the State. Many of these areas also corresponded with disproportionate shares of black households. These areas tended to be locations of Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs), which is discussed ***Section IV.C Racially or Ethnically Concentrated Areas of Poverty.***

Summary

In 2018, unemployment in the Non-Entitlement Areas was at 3.9 percent. This is representative of a labor force of 1,322,785 people and 1,271,796 people employed. Real per capita income has continued to grow in recent years. However, poverty has grown to 16.8 percent, representing 487,794 persons living in poverty in the Non-Entitlement Areas of the State.

Map IV.3
2017 Poverty
State of Alabama Non-Entitlement
2017 ACS, Tigerline



Housing

Housing Production

The Census Bureau reports building permit authorizations and "per unit" valuation of building permits by county annually. Single-family construction usually represents most residential development in the State. Single-family building permit authorizations in the State of Alabama Non-Entitlement increased from 9,036 authorizations in 2017 to 9,660 authorizations in 2018.

The real value of single-family building permits increased from 215,190 dollars in 2017 to 221,840 dollars in 2018. This compares to an increase in permit value statewide, with values rising from 209,909 dollars in 2017 to 212,193 dollars in 2018. Additional details are given in Table IV.27 as well as in Diagram IV.8 and Diagram IV.9.

Table IV.27
Building Permits and Valuation
State of Alabama Non-Entitlement
Census Bureau Data, 1980–2018

Year	Authorized Construction in Permit Issuing Areas					Per Unit Valuation, (Real 2017$)	
	Single-Family	Duplex Units	Tri- and Four-Plex	Multi-Family Units	Total Units	Single-Family Units	Multi-Family Units
1980	6,046	222	555	3,979	10,802	82,943	45,111
1981	3,866	208	394	3,163	7,631	80,801	62,230
1982	3,125	134	151	2,156	5,566	78,397	52,210
1983	5,653	190	351	3,817	10,011	84,633	50,936
1984	5,309	180	661	2,146	8,296	89,013	52,977
1985	6,625	90	517	3,174	10,406	87,246	36,828
1986	7,558	126	211	4,294	12,189	96,245	38,124
1987	6,700	98	119	1,846	8,763	113,510	45,440
1988	6,031	86	232	1,442	7,791	122,180	39,191
1989	5,367	94	310	1,337	7,108	123,118	49,589
1990	5,685	56	132	2,064	7,937	124,606	55,306
1991	7,319	104	227	1,340	8,990	121,368	54,173
1992	9,724	118	117	1,411	11,370	127,463	44,105
1993	11,370	178	196	1,798	13,542	127,628	49,339
1994	10,950	276	210	2,699	14,135	129,374	72,563
1995	10,435	334	190	4,318	15,277	135,406	72,226
1996	11,474	152	204	3,863	15,693	139,165	62,386
1997	11,008	162	353	2,199	13,722	152,952	72,312
1998	11,678	120	209	3,947	15,954	151,955	77,933
1999	11,974	116	250	2,964	15,304	163,041	85,044
2000	10,720	30	182	2,751	13,683	158,445	90,794
2001	11,203	104	38	1,880	13,225	161,293	93,019
2002	12,316	136	99	1,257	13,808	165,446	60,438
2003	16,326	126	112	2,096	18,660	164,285	112,694
2004	18,091	198	108	3,544	21,941	169,567	134,193
2005	19,684	56	123	4,243	24,106	180,779	168,459
2006	18,838	128	201	5,513	24,680	179,500	177,740
2007	14,627	30	115	3,347	18,119	180,518	79,729
2008	9,310	100	49	3,280	12,739	176,564	88,273
2009	7,100	48	136	2,419	9,703	184,923	65,722
2010	6,275	40	104	1,289	7,708	193,951	86,609
2011	6,425	10	86	1,944	8,465	203,268	67,927
2012	6,568	6	62	2,830	9,466	215,385	67,690
2013	6,505	16	211	1,257	7,989	228,868	87,620
2014	7,073	34	147	1,184	8,438	217,220	85,704
2015	7,439	50	142	2,453	10,084	224,909	91,182
2016	8,693	58	188	1,261	10,200	216,306	157,379
2017	9,036	34	29	453	9,552	215,190	88,908
2018	9,660	54	40	981	10,735	221,840	158,306

Diagram IV.8
Single-Family Permits
State of Alabama Non-Entitlement
Census Bureau Data, 1980–2018

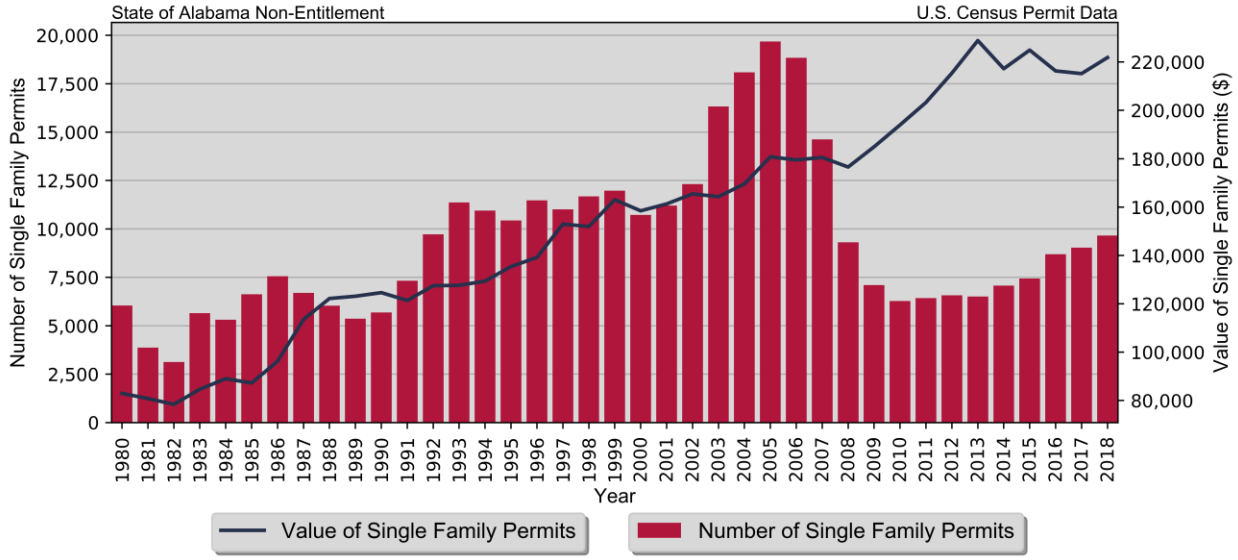
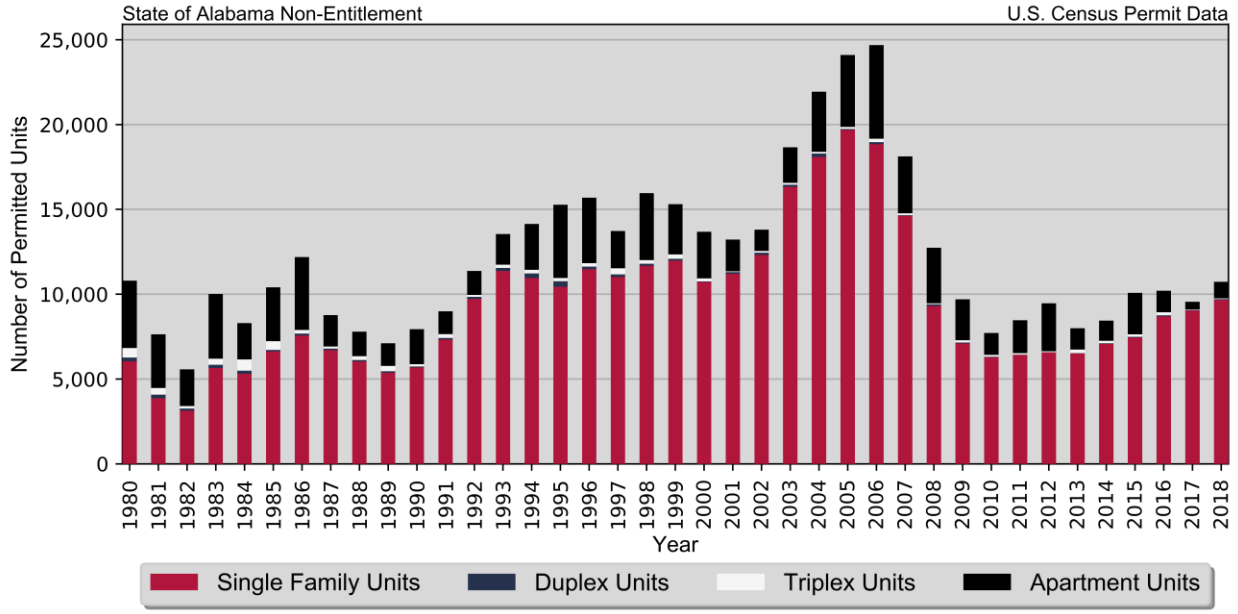


Diagram IV.9
Total Permits by Unit Type
State of Alabama Non-Entitlement
Census Bureau Data, 1980–2018



Housing Characteristics

Households by type and tenure are shown in Table IV.28. Family households represented 69.2 percent of households, while non-family households accounted for 30.8 percent. These changed from 70.8 and 29.2 percent, respectively.

Table IV.28
Household Type by Tenure
State of Alabama Non-Entitlement
2010 Census SF1 & 2017 Five-Year ACS Data

Household Type	2010 Census		2017 Five-Year ACS	
	Households	Households	Households	% of Total
Family Households	804,128	70.8%	772,148	69.2%
Married-Couple Family	597,266	74.3%	579,644	75.1%
Owner-Occupied	515,107	86.2%	495,590	85.5%
Renter-Occupied	82,159	13.8%	84,054	14.5%
Other Family	206,862	25.7%	192,504	26.8%
Male Householder, No Spouse Present	52,681	25.5%	48,055	27.4%
Owner-Occupied	34,775	66%	31,884	66.3%
Renter-Occupied	17,906	34%	16,171	33.7%
Female Householder, No Spouse Present	154,181	74.5%	144,449	80.1%
Owner-Occupied	89,336	57.9%	78,696	54.5%
Renter-Occupied	64,845	42.1%	65,753	45.5%
Non-Family Households	331,827	29.2%	342,996	30.8%
Owner-Occupied	212,252	64%	217,881	63.5%
Renter-Occupied	119,575	36%	125,115	36.5%
Total	**1,135,955**	**100%**	**1,115,144**	**100%**

Table IV.29, below, shows housing units by type in 2010 and 2017. In 2010, there were 1,306,830 housing units, compared with 1,359,057 in 2017. Single-family units accounted for 70.1 percent of units in 2017, compared to 69.5 percent in 2010. Apartment units accounted for 6.3 percent in 2017, compared to 5.6 percent in 2010.

Table IV.29
Housing Units by Type
State of Alabama Non-Entitlement
2010 & 2017 Five-Year ACS Data

Unit Type	2010 Five-Year ACS		2017 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	908,075	69.5%	**953,266**	70.1%
Duplex	25,173	1.9%	25,828	1.9%
Tri- or Four-Plex	26,045	2%	28,926	2.1%
Apartment	72,965	5.6%	84,957	6.3%
Mobile Home	273,123	20.9%	264,537	19.5%
Boat, RV, Van, Etc.	1,449	0.1%	1,543	0.1%
Total	**1,306,830**	**100%**	**1,359,057**	**100%**

Table IV.30 shows housing units by tenure from 2010 to 2017. By 2017, there were 1,359,057 housing units. An estimated 73.9 percent were owner-occupied, and 17.9 percent were vacant.

Table IV.30
Housing Units by Tenure
State of Alabama Non-Entitlement
2010 Census & 2017 Five-Year ACS Data

Tenure	2010 Census		2017 Five-Year ACS	
	Units	% of Total	Units	% of Total
Occupied Housing Units	1,135,955	85.5%	1,115,144	82.1%
Owner-Occupied	851,470	75%	824,051	73.9%
Renter-Occupied	284,485	25%	291,093	26.1%
Vacant Housing Units	192,806	14.5%	243,913	17.9%
Total Housing Units	**1,328,761**	**100%**	**1,359,057**	**100%**

Households by income for the 2010 and 2017 5-year ACS are shown in Table IV.31. Households earning more than 100,000 dollars per year represented 17.7 percent of households in 2017, compared to 13.7 percent in 2010. Meanwhile, households earning less than 15,000 dollars accounted for 15.3 percent of households in 2017, compared to 17.1 percent in 2000.

Table IV.31
Households by Income
State of Alabama Non-Entitlement
2010 & 2017 Five-Year ACS Data

Income	2010 Five-Year ACS		2017 Five-Year ACS	
	Households	% of Total	Households	% of Total
Less than $15,000	187,041	17.1%	170,374	15.3%
$15,000 to $19,999	75,588	6.9%	69,090	6.2%
$20,000 to $24,999	72,081	6.6%	68,312	6.1%
$25,000 to $34,999	130,296	11.9%	123,093	11%
$35,000 to $49,999	161,203	14.8%	158,331	14.2%
$50,000 to $74,999	197,762	18.1%	200,956	18%
$75,000 to $99,999	118,244	10.8%	127,472	11.4%
$100,000 or More	149,961	13.7%	197,516	17.7%
Total	**1,092,176**	**100%**	**1,115,144**	**100%**

Table IV.32 shows households by year home built for the 2010 and 2017 5-year ACS data. Housing units built between 2000 and 2009, account for 15 percent of households in 2010 and 18.7 percent of households in 2017. Housing units built in 1939 or earlier represented 4.2 percent of households in 2017 and 5.2 percent of households in 2010.

Table IV.32
Households by Year Home Built
State of Alabama Non-Entitlement
2010 & 2017 Five-Year ACS Data

Year Built	2010 Five-Year ACS		2017 Five-Year ACS	
	Households	% of Total	Households	% of Total
1939 or Earlier	56,888	5.2%	46,778	4.2%
1940 to 1949	45,120	4.1%	35,712	3.2%
1950 to 1959	78,694	7.2%	68,004	6.1%
1960 to 1969	118,334	10.8%	104,829	9.4%
1970 to 1979	187,290	17.1%	175,802	15.8%
1980 to 1989	187,499	17.2%	174,641	15.7%
1990 to 1999	254,073	23.3%	249,134	22.3%
2000 to 2009	164,278	15%	209,080	18.7%
2010 or Later	.	.	51,164	4.6%
Total	**1,092,176**	**100%**	**1,115,144**	**100%**

The distribution of unit types by race are shown in Table IV.33. An estimated 75.6 percent of white households occupy single-family homes, while 59.8 percent of black households do. Some 4 percent of white households occupied apartments, while 10.4 percent of black households do. An estimated 71.7 percent of Asian, and 77.5 percent of American Indian households occupy single-family homes.

Table IV.33
Distribution of Units in Structure by Race
State of Alabama Non-Entitlement
2017 Five-Year ACS Data

Unit Type	White	Black	American Indian	Asian	Native Hawaiian/Pacific Islanders	Other	Two or More Races
Single-Family	75.6%	59.8%	77.5%	71.7%	83.9%	40.4%	72.1%
Duplex	1.3%	4.7%	3.4%	2.8%	3.2%	1.4%	2.6%
Tri- or Four-Plex	1.5%	4.8%	1.3%	3.5%	2.9%	1.9%	2.1%
Apartment	4%	10.4%	2%	18%	4.1%	8.3%	7.3%
Mobile Home	17.4%	20.2%	15.5%	3.7%	2.6%	48%	15.7%
Boat, RV, Van, Etc.	0.2%	0%	0.3%	0.3%	3.2%	0%	0.3%
Total	**100%**	**100%**	**100%**	**100%**	**100%**	**100%**	**100%**

The disposition of vacant units between 2010 and 2017 are shown in Table IV.34. An estimated 21.1 percent of vacant units were for rent in 2010. In addition, some 10.9 percent of vacant units were for sale. "Other" vacant units represented 33.3 percent of vacant units in 2010. "Other" vacant units are not for sale or rent, or otherwise available to the marketplace. These units may be problematic if concentrated in certain areas, and may create a "blighting" effect.

By 2017, for rent units accounted for 15.3 percent of vacant units, while for sale units accounted for 7.7 percent. "Other" vacant units accounted for 46 percent of vacant units, representing a total of 112,106 "other" vacant units.

Table IV.34
Disposition of Vacant Housing Units
State of Alabama Non-Entitlement
2010 Census & 2017 Five-Year ACS Data

Disposition	2010 Census		2017 Five-Year ACS	
	Units	% of Total	Units	% of Total
For Rent	40,601	21.1%	37,211	15.3%
For Sale	20,998	10.9%	18,730	7.7%
Rented Not Occupied	2,233	1.2%	5,853	2.4%
Sold Not Occupied	6,411	3.3%	8,605	3.5%
For Seasonal, Recreational, or Occasional Use	58,157	30.2%	61,117	25.1%
For Migrant Workers	182	0.1%	291	0.1%
Other Vacant	64,224	33.3%	112,106	46%
Total	**192,806**	**100%**	**243,913**	**100%**

Table IV.35, shows the number of households in the study area by number of bedrooms and tenure. There were 5,810 rental households with no bedrooms, otherwise known as studio apartments. Two-bedroom households accounted for 4.3 percent of total households in the State of Alabama Non-Entitlement. In the State of Alabama Non-Entitlement, the 722,347 households with

three bedrooms accounted for 22.4 percent of all households, and there were only 46,575 five-bedroom or more households, which accounted for 15.7 percent of all households.

Table IV.35
Households by Number of Bedrooms
State of Alabama Non-Entitlement
2017 5-Year ACS Data

Number of Bedrooms	Tenure			% of Total
	Own	Rent	Total	
None	3,072	5,810	13,142	100
One	10,353	34,591	58,341	1
Two	116,409	107,840	304,606	4.3
Three	488,857	118,035	722,347	22.4
Four	168,623	20,965	214,046	53.2
Five or more	36,737	3,852	46,575	15.7
Total	**1,115,144**	**291,093**	**1,359,057**	**100**

Household mortgage status is reported in Table IV.36. In the State of Alabama Non-Entitlement, households with a mortgage accounted for 54.1 percent of all households or 445,928 housing units, and the remaining 48.1 percent or 395,963 units had no mortgage. Of those units with a mortgage, 48,260 had either a second mortgage or home equity loan, 1,705 had both a second mortgage and home equity loan, and 395,963 or 48.1 percent had no second mortgage or no home equity loan.

Table IV.36
Mortgage Status
State of Alabama Non-Entitlement
2017 5-Year ACS Data

Mortgage Status	State of Alabama Non-Entitlement	
	Households	% of Households
Housing units with a mortgage, contract to purchase, or similar debt	445,928	54.1
With either a second mortgage or home equity loan, but not both	48,260	5.9
Second mortgage only	13,583	1.6
Home equity loan only	34,677	4.2
Both second mortgage and home equity loan	1,705	0.2
No second mortgage and no home equity loan	395,963	48.1
Housing units without a mortgage	378,123	45.9
Total	**824,051**	**100%**

Map IV.4, on the following page shows the Median Home Value in 2017. Median home values were highest in areas adjacent to the entitlement cities, in northern Alabama, and along the southern coast. Median home values were lowest in the central and rural areas of the State. This trend was similar for median contract rents, as seen in Map IV.5.

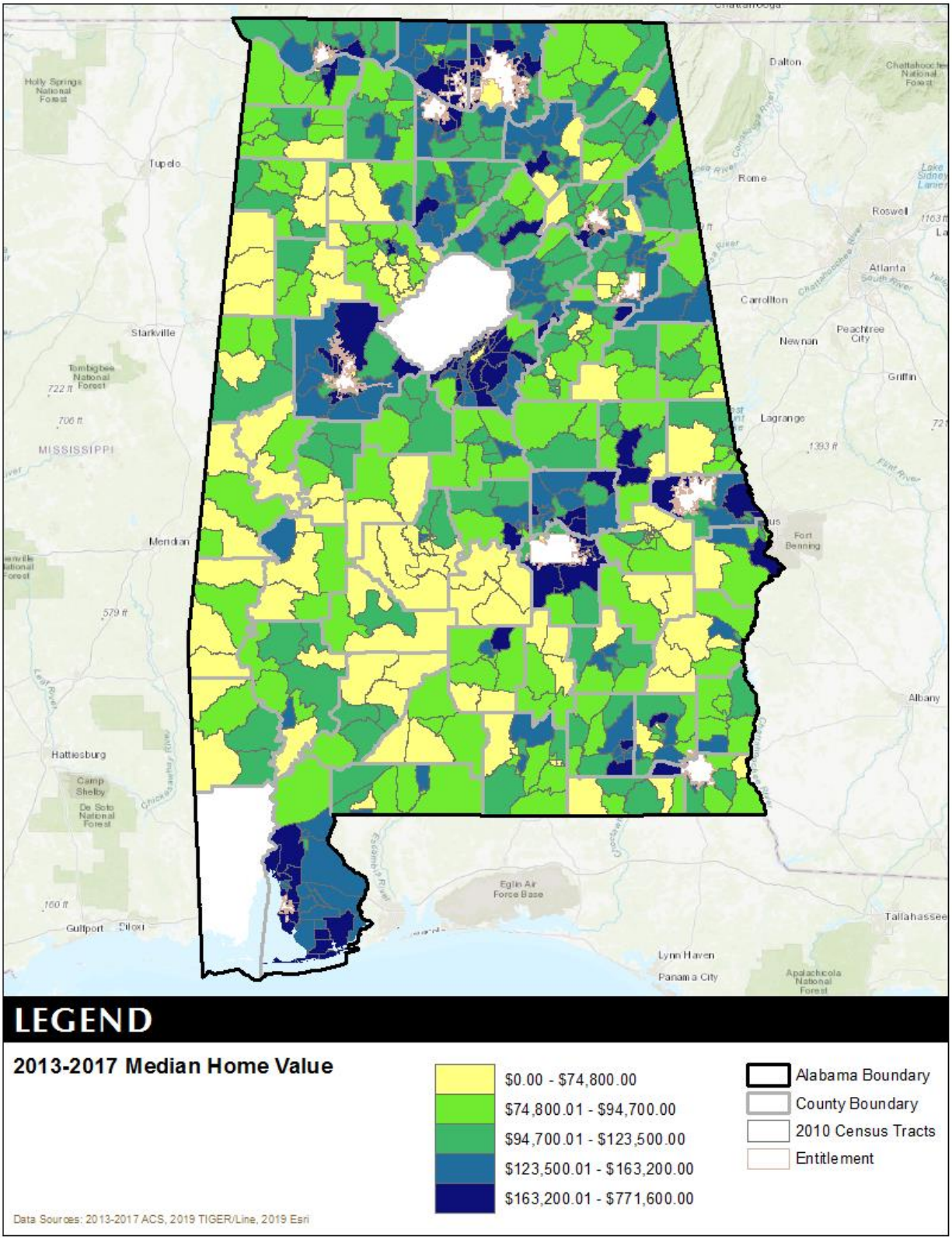
Home Mortgage Loans

The FFEIC The Home Mortgage Disclosure Act (HMDA) was enacted by Congress in 1975. Data collected under the HMDA provide a comprehensive portrait of home loan activity, including information pertaining to home purchase loans, home improvement loans, and refinancing. For the analysis only owner-occupied originated loans for single-family units were considered. As can be seen in Table IV.37, of the 87,156 loans in 2017, 50,920 loans were for Home Purchases, 7,793 were for Home Improvement and 28,443 were for refinancing.

Table IV.37
Owner-Occupied Single-Family Home Loans by Loan Type
State of Alabama Non-Entitlement
2008 – 2017 HMDA Data

Year	Home Purchase	Home Improvement	Refinancing	Total
2008	40,566	8,019	50,355	98,940
2009	31,995	5,750	71,959	109,704
2010	30,411	5,419	56,992	92,822
2011	29,118	6,949	46,157	82,224
2012	31,874	6,217	67,458	105,549
2013	35,193	6,600	57,877	99,670
2014	36,493	6,500	27,611	70,604
2015	41,822	7,141	33,768	82,731
2016	47,653	7,677	38,674	94,004
2017	50,920	7,793	28,443	87,156

Map IV.4
2017 Median Home Values
State of Alabama Non-Entitlement
2017 ACS, Tigerline



Map IV.5
2017 Median Contract Rents
State of Alabama Non-Entitlement
2017 ACS, Tigerline

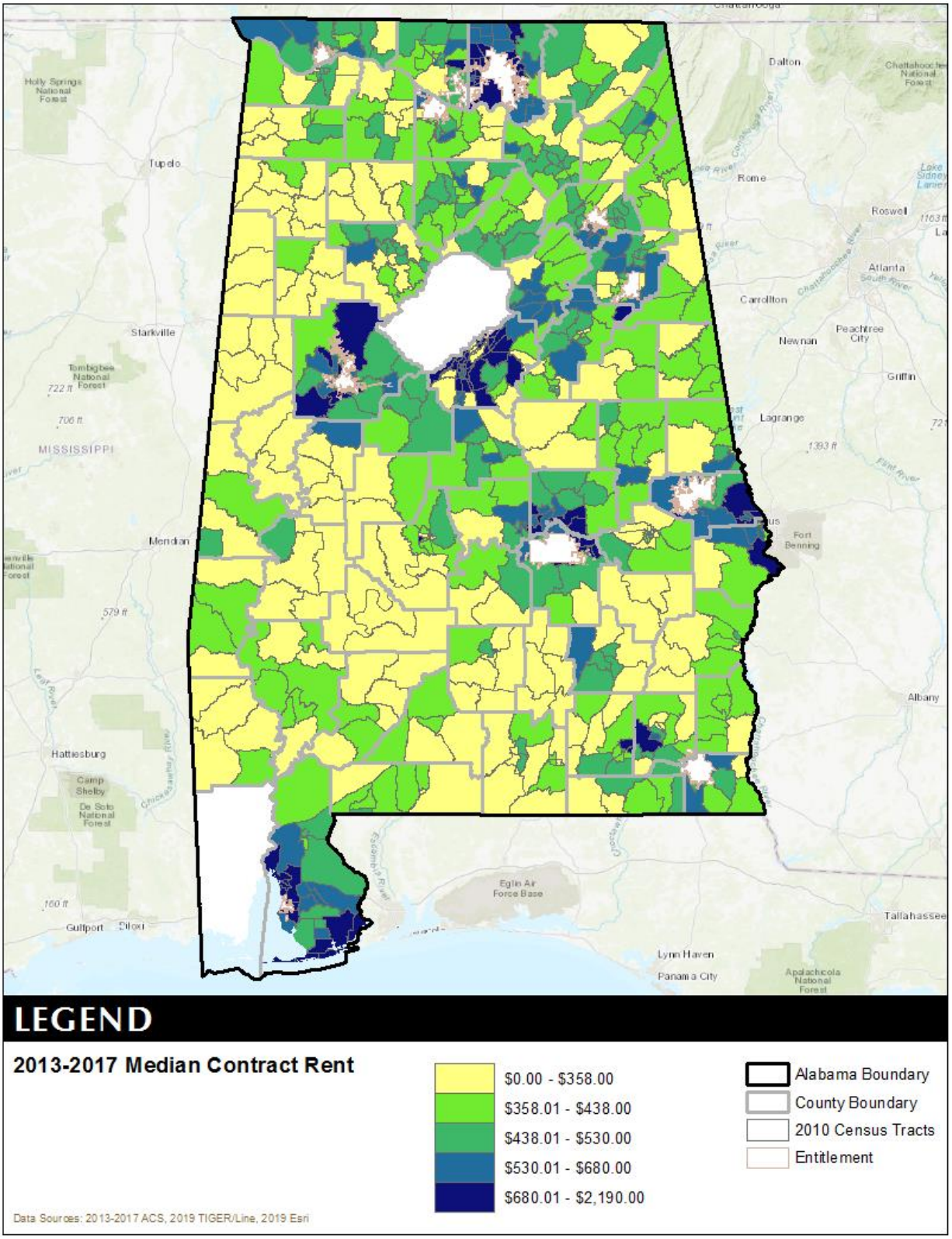


Table IV.38 shows the average loan value by loan type. In 2008, average home purchase loans was 163,826 dollars in 2012 and 182,853 dollars in 2017. Overall, average loans were 144,689 dollars in 2008 and 163,768 dollars in 2017.

Table IV.38
Owner-Occupied Single-Family Home Loans by Average Loan Amount
State of Alabama Non-Entitlement
2008 – 2017 HMDA Data

Year	Home Purchase	Home Improvement	Refinancing	Total
2008	$155,864	$39,671	$152,410	$144,689
2009	$154,695	$40,698	$164,934	$155,436
2010	$156,545	$33,768	$161,278	$152,283
2011	$156,539	$30,229	$158,102	$146,742
2012	$163,826	$38,079	$164,973	$157,152
2013	$169,993	$36,058	$151,513	$150,393
2014	$168,975	$31,604	$147,632	$147,982
2015	$172,735	$37,137	$161,982	$156,642
2016	$178,041	$45,921	$169,955	$163,924
2017	$182,853	$50,683	$160,586	$163,768

Table IV.39 shows the total volume of owner-occupied single-family loans. In 2008, the total volume of home purchase loans was 5,221,801,000 dollars in 2012 and 9,310,852,000 dollars in 2017. Overall, the total volume of loans were 14,315,483,000 dollars in 2008 and 14,273,363,000 dollars in 2017.

Table IV.39
Total Volume of Owner-Occupied Single-Family Loans
State of Alabama Non-Entitlement
2008 – 2017 HMDA Data

Year	Home Purchase	Home Improvement	Refinancing	Total
2008	$6,322,768,000	$318,119,000	$7,674,596,000	$14,315,483,000
2009	$4,949,458,000	$234,011,000	$11,868,468,000	$17,051,937,000
2010	$4,760,681,000	$182,988,000	$9,191,579,000	$14,135,248,000
2011	$4,558,094,000	$210,063,000	$7,297,518,000	$12,065,675,000
2012	$5,221,801,000	$236,739,000	$11,128,730,000	$16,587,270,000
2013	$5,982,551,000	$237,985,000	$8,769,109,000	$14,989,645,000
2014	$6,166,395,000	$205,429,000	$4,076,268,000	$10,448,092,000
2015	$7,224,139,000	$265,198,000	$5,469,795,000	$12,959,132,000
2016	$8,484,171,000	$352,537,000	$6,572,840,000	$15,409,548,000
2017	$9,310,852,000	$394,973,000	$4,567,538,000	$14,273,363,000

Summary

The Non-Entitlement Areas experienced a drop-off in housing production during the recent recession, which has begun to recover. In 2018, there were 10,735 total units produced in the study area, with 9,660 of these being multifamily units. The value of single-family permits, however, has continued to rise, reaching $221,840 in 2018. Since 2010, the study area has seen an increase in the proportion of vacant units, experiencing a rise in the proportion of "other" vacant units.

B. Segregation and Integration

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

A Technical Note on the Dissimilarity Index Methodology

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

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

Where *i* indexes a geographic unit, *j* is the jth jurisdiction, *W* is group one and *B* is group two, and *N* is the number of geographic units, starting with *i,* in jurisdiction j.[8]

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

The principle exception was the decision to use Census tract-level data to calculate dissimilarity index values through 2010. While HUD uses tract level data in 1990 and 2000, HUD uses block group-level data in 2010. The decision to use tract-level data in all years included in this study was motivated by the fact that the dissimilarity index is sensitive to the geographic base unit from which it is calculated. Concretely, use of smaller geographic units produces dissimilarity index values that tend to be higher than those calculated from larger geographic units.[9]

As a general rule, HUD considers the thresholds appearing in the table below to indicate low, moderate, and high levels of segregation:

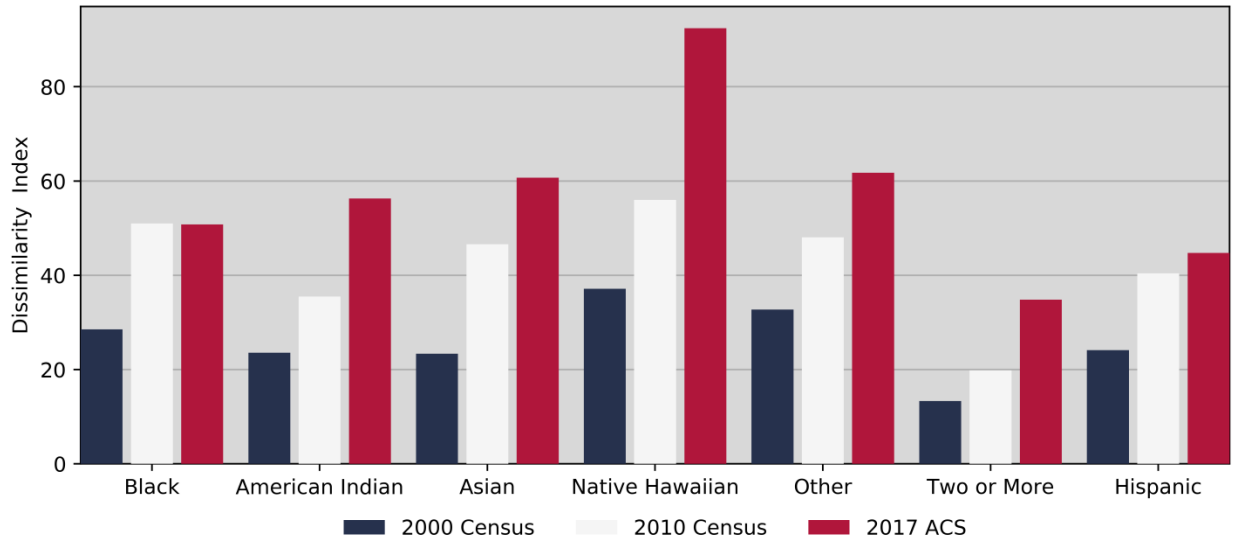
Interpreting the dissimilarity index		
Measure	**Values**	**Description**
Dissimilarity Index [range 0-100]	<40	Low Segregation
	40-54	Moderate Segregation
	>55	High Segregation

[8] Affirmatively Furthering Fair Housing Data Documentation. HUD. December 2015.
[9] Wong, David S. "Spatial Decomposition of Segregation Indices: A Framework Toward Measuring Segregation at Multiple Levels." Geographical Analyses, 35:3. The Ohio State University. July 2003. P. 179.

Segregation Levels

Diagram IV.10 shows the rate of segregation by race and ethnicity for 2000, 2010, and 2017. During this time period, black households have had an increasing level of segregation, ending at a moderate level of segregation. American Indian households had a high level of segregation in 2017, which has grown from a low level in 2000. The level of segregation for Asian households has also increased from 2000 to 2017, resulting in a high level of segregation. Native Hawaiian households increased significantly in terms of segregation, according to the dissimilarity index, resulting in a high level of segregation in 2017. "Other" race households grew to a high level of segregation in 2017. Two or more race households are also seeing a rate of increase in the dissimilarity index but remain at a low level of segregation. Hispanic households also saw an increasing level of segregation since 2000, which ended at a moderate level of segregation in 2017. Overall, the Non-Entitlement Areas of Alabama saw increasing levels of segregation for minority populations.

Diagram IV.10
Dissimilarity Index
State of Alabama Non-Entitlement



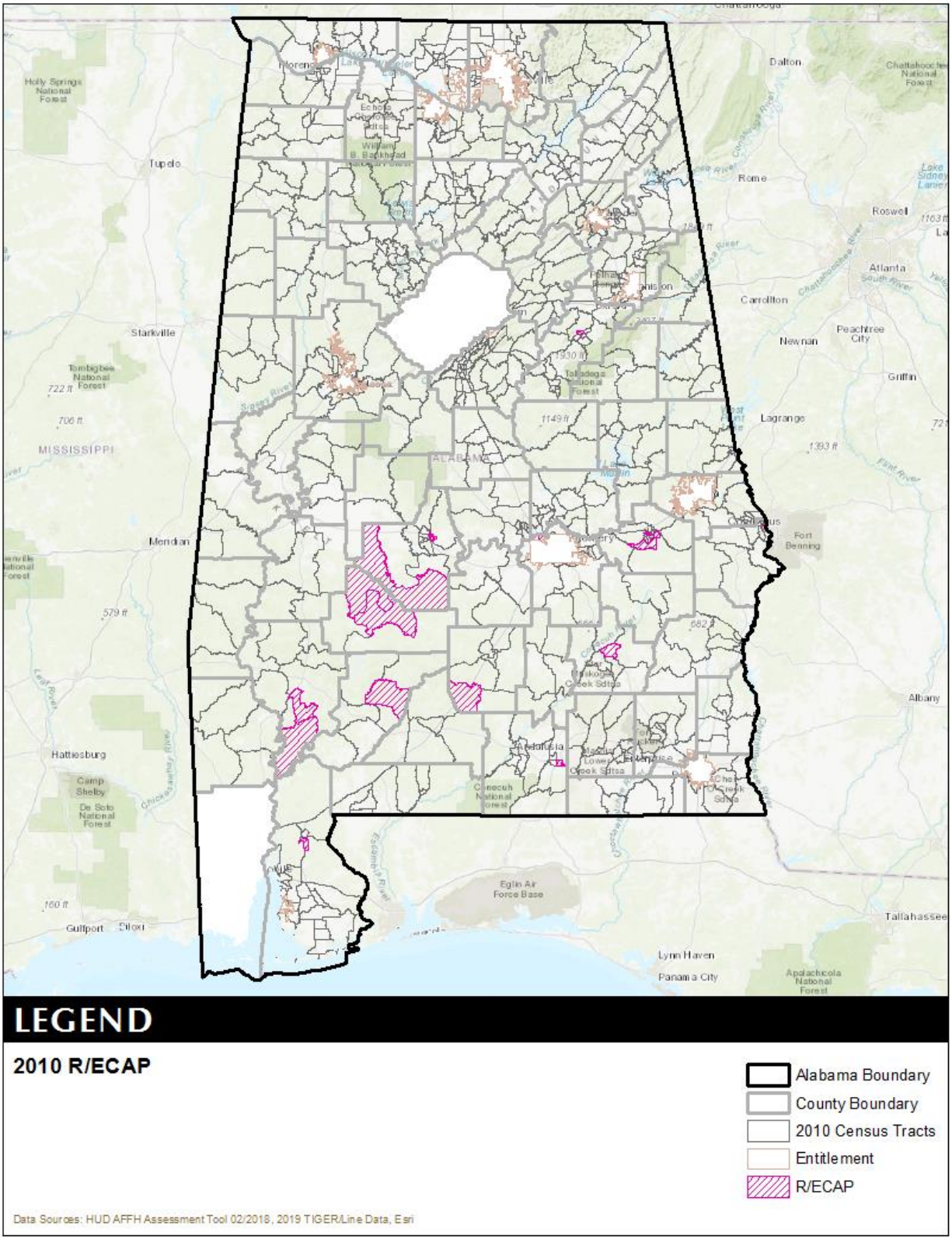
C. Racially or Ethnically Concentrated Areas of Poverty

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

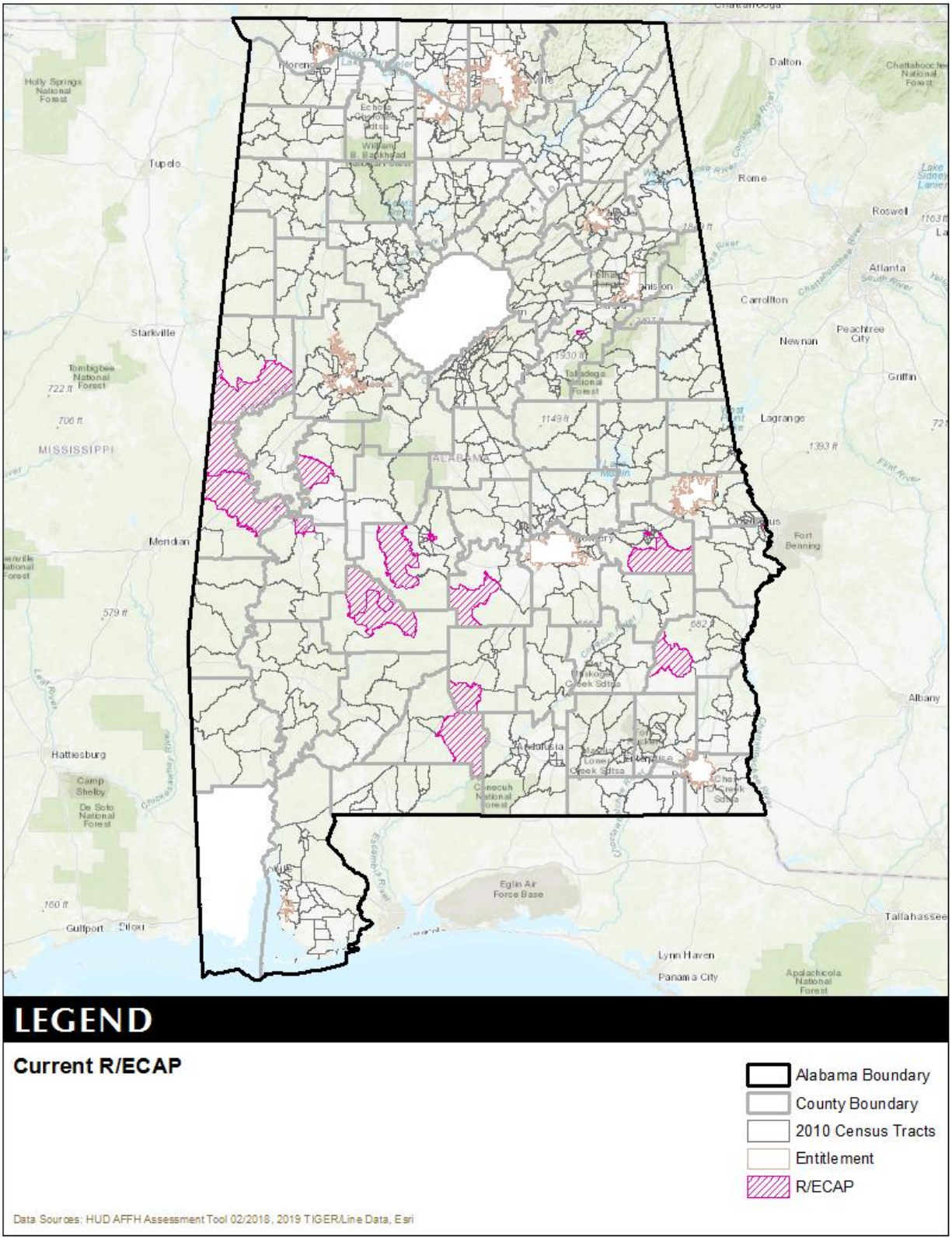
R/ECAPs over Time

The R/ECAPS in the State of Alabama's Non-Entitlement Areas are illustrated n the maps on the following pages. The number of R/ECAPs increased from 2010 to 2017. R/ECAPs tended to be found in the central and southern parts of the State. These areas shifted slightly between 2010 and 2017, but remained mainly in the more rural and central parts of Alabama.

Map IV.6
2010 R/ECAPs
State of Alabama Non-Entitlement Areas
HUD AFFH Database, 2017 ACS



Map IV.7
2017 R/ECAPs
State of Alabama Non-Entitlement Areas
HUD AFFH Database, 2017 ACS



D. Disparities in Access to Opportunity

The following section describes the HUD defined terms of Access to Opportunity. These measures, as outlined below, describe a set of conditions that may or may not accurately reflect the actual conditions in the study area. These data are supplemented by local data when available and ultimately provide only a piece of the total understanding of access to the various opportunities in the community. They are used as measured to compare geographic trends and levels of access within the community.

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

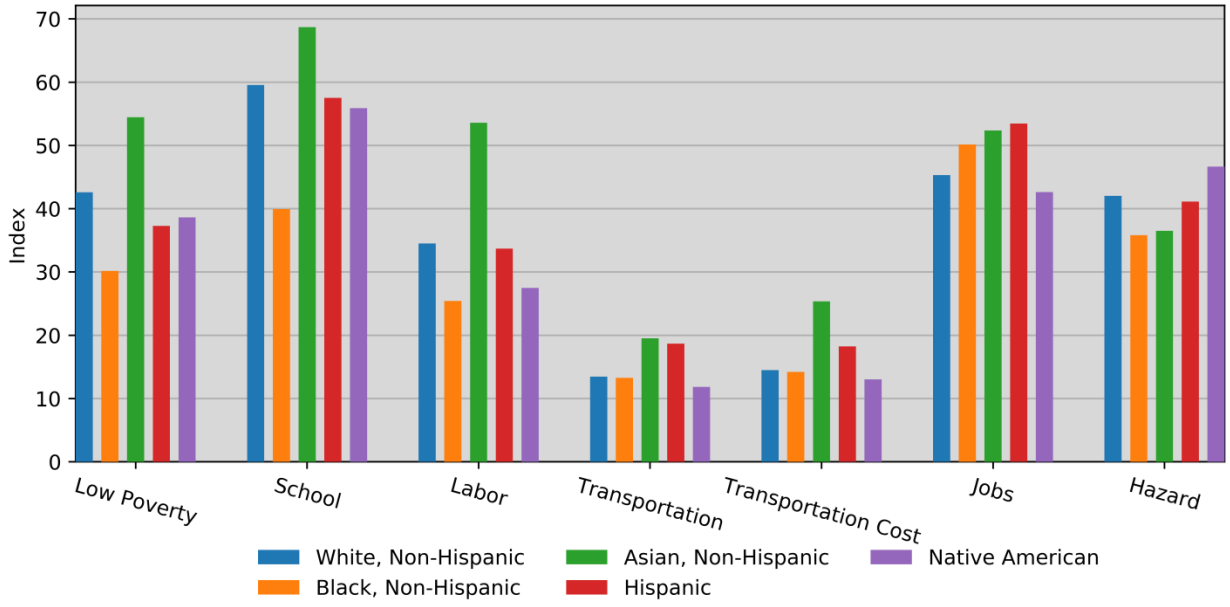
The HUD opportunity indices are access to Low Poverty areas; access to School Proficiency; characterization of the Labor Market Engagement; residence in relation to Jobs Proximity; Low Transportation Costs; Transit Trips Index; and a characterization of where you live by an Environmental Health indicator.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

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

Diagram IV.11 shows the level of access to opportunities by race and ethnicity. Black, Hispanic and Native American households have lower access to Low Poverty areas, compared to other races and ethnicities in the Non-Entitlement Areas. Black, Hispanic, and Native American households also have markedly lower access to school proficiency. Black, Hispanic, and Native American households have lower access to labor market engagement. There is little variance by race for

access to transportation trips and transportation cost. There is little variance by race or ethnicity to job proximity and environmental health.

Diagram IV.11
Access to Opportunity
State of Alabama Non-Entitlement

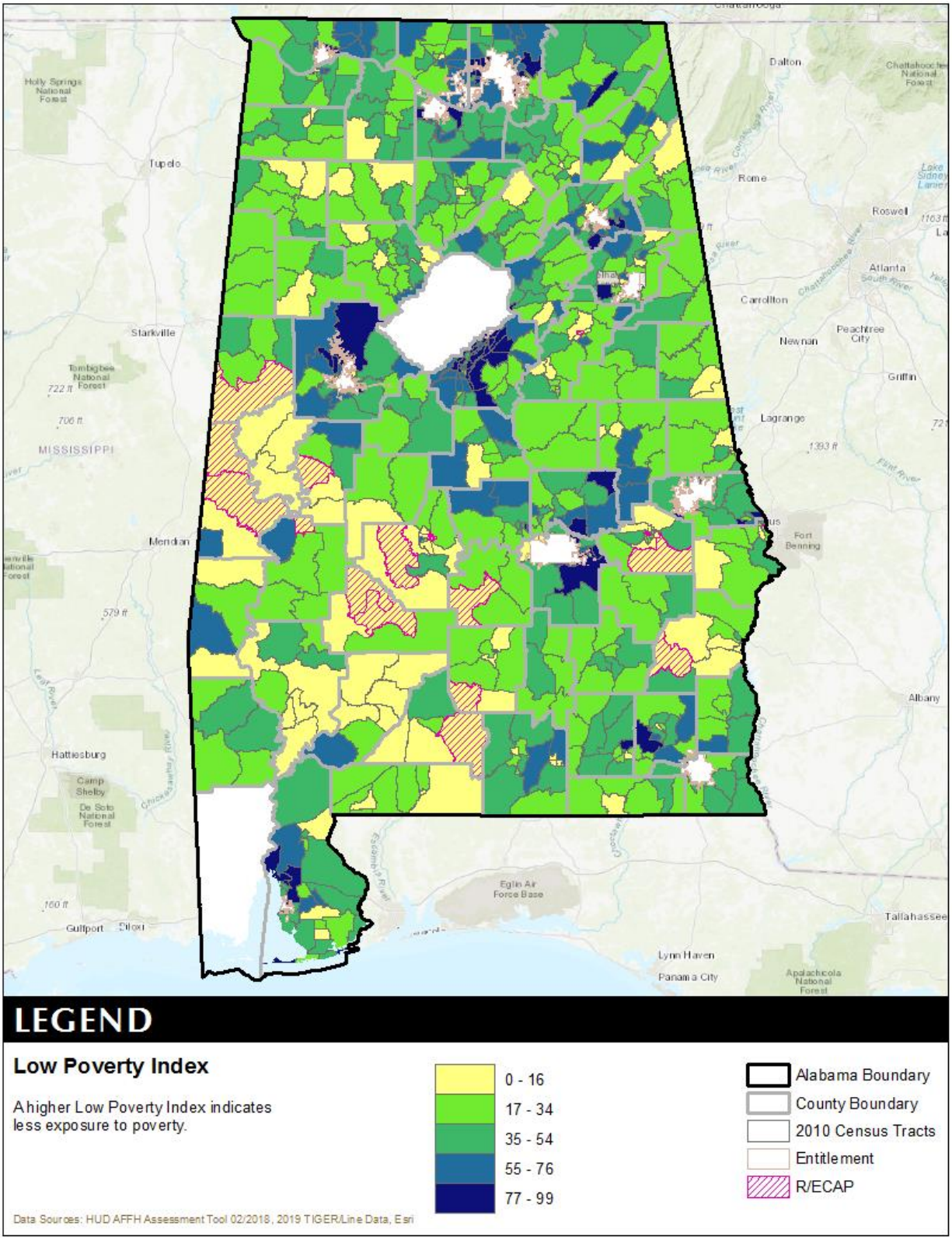


LOW POVERTY INDEX

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

The highest scores were found in the more urban areas of the State, in areas around the entitlement cities of Birmingham, Tuscaloosa, Montgomery, and Huntsville. Conversely, the lowest scores were scattered in the more rural parts of the State.

Map IV.8
Low Poverty
State of Alabama Non-Entitlement Areas
HUD AFFH Database



SCHOOL PROFICIENCY INDEX

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

School Proficiency indices are highest in the northern areas of the State, as well as areas around the entitlements. The southern and more rural areas of the State tended to have lower levels of school proficiency, according to the School Proficiency Index.

JOBS PROXIMITY INDEX

The Jobs Proximity Index measures the physical distances between place of residence and jobs and is shown in Map IV.10. Job proximity varied widely across the State. As one would expect, the areas closest to the city centers had the highest job proximity index ratings.

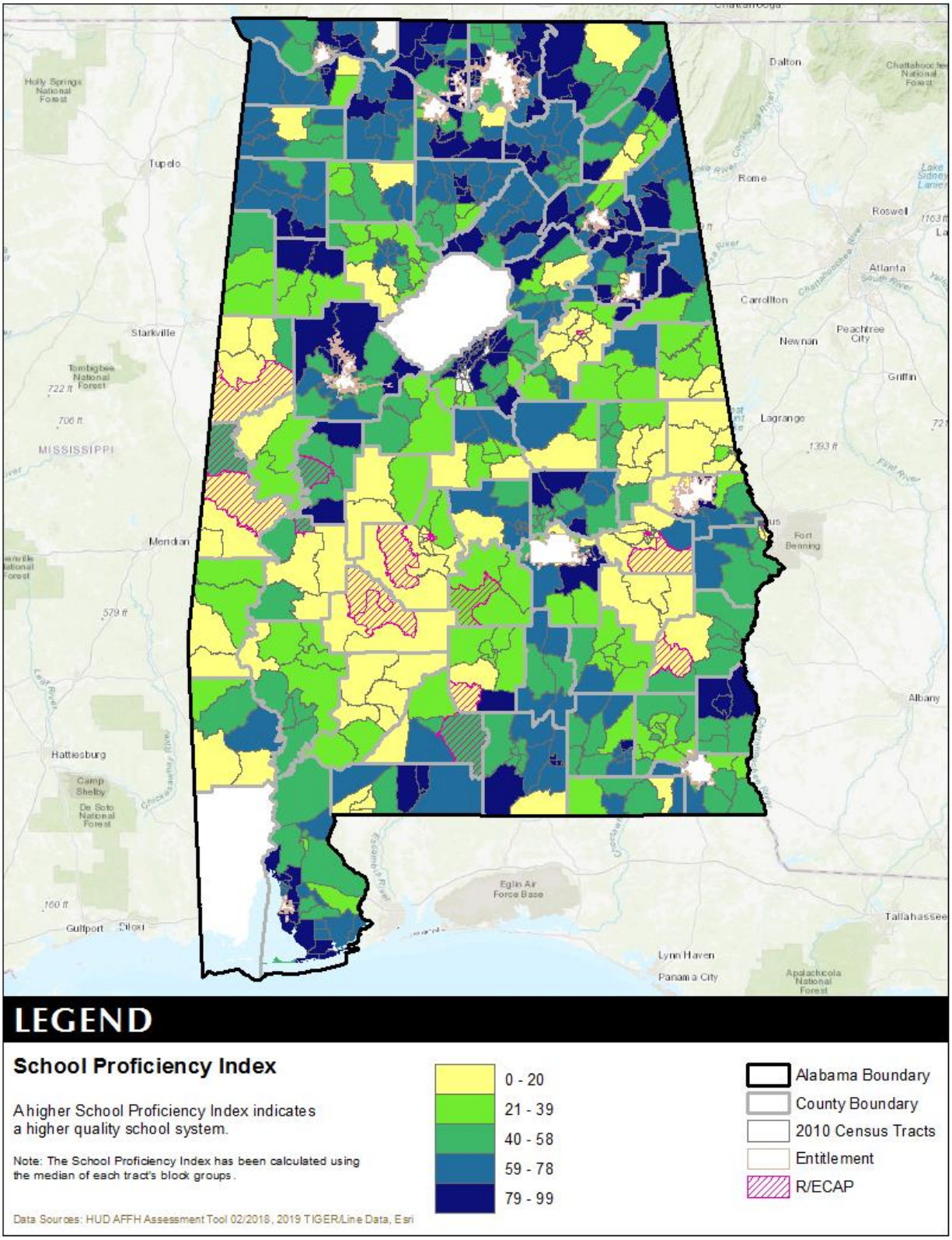
LABOR MARKET ENGAGEMENT INDEX

The Labor Market Engagement Index provides a measure of unemployment rate, labor-force participation rate, and percent of the population ages 25 and above with at least a bachelor's degree, by neighborhood Map IV.11 shows the labor market engagement for the study area. Areas around the entitlement cities and more urban areas had the highest rates of labor market engagement. On the other hand, more rural areas tended to have lower levels of labor market engagement.

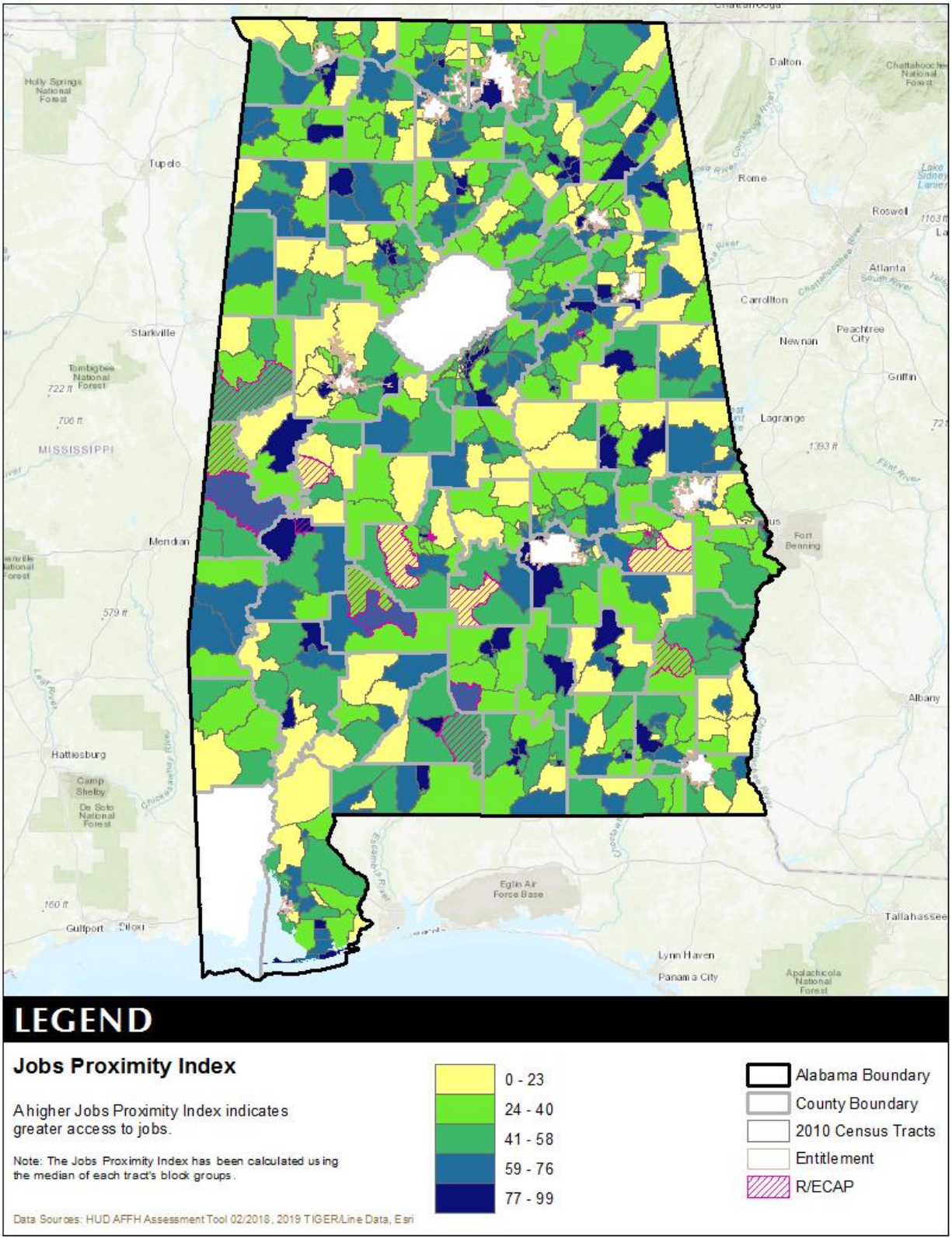
While there may seem to be a contradiction in job proximity and labor market engagement in the varying geographical distribution between these two measures, job proximity does not equate to labor market engagement. While there may be the physical access to jobs, as shown by job proximity, persons may not be able to access these jobs without the appropriate education or training to acquire these jobs. These two measures show separately the physical access to jobs and the degree to which households are engaged in the marketplace, including the unemployment rate and education level of households in the State.

Geographic location did seem to correspond with greater access to jobs and labor market engagement, with parts of the State have a higher level of labor market engagement than other areas. There was a marked difference between the rural and urban areas in the State in terms of access. In addition, black, Hispanic, and Native American households have lower access to labor market engagement.

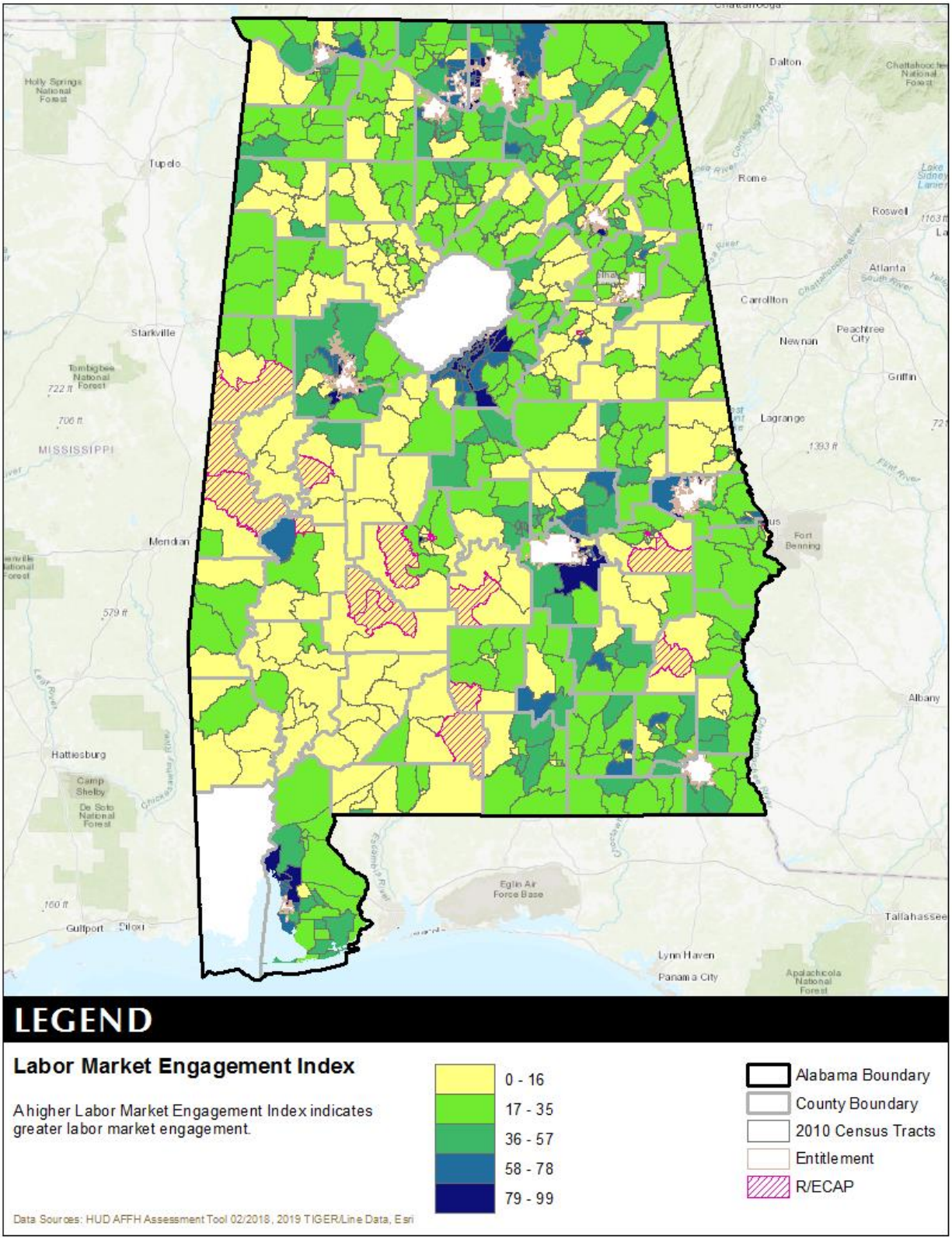
Map IV.9
School Proficiency
State of Alabama Non-Entitlement Areas
HUD AFFH Database



Map IV.10
Job Proximity
State of Alabama Non-Entitlement Areas
HUD AFFH Database



Map IV.11
Labor Market Engagement
State of Alabama Non-Entitlement Areas
HUD AFFH Database



Transportation Trip Index

The Transportation Trip Index measures proximity to public transportation by neighborhood. There was little difference in index rating across racial and ethnic groups. The Transportation Trip Index measures proximity to public transportation by neighborhood. The Transit Trips Index measures how often low-income families in a neighborhood use public transportation. The highest rate of transit trips were in the more urban parts of the Non-Entitlement Areas of the State, while the lowest ratings were in the more rural parts of the State.

Low Transportation Cost Index

The Low Transportation Cost Index measures cost of transport and proximity to public transportation by neighborhood. Transportation Costs saw a similar pattern as with Transit Trips; the highest transportation cost index ratings were in the more urban parts of the State, while lower index ratings were in the rural parts of the study area.

Environmental Health Index

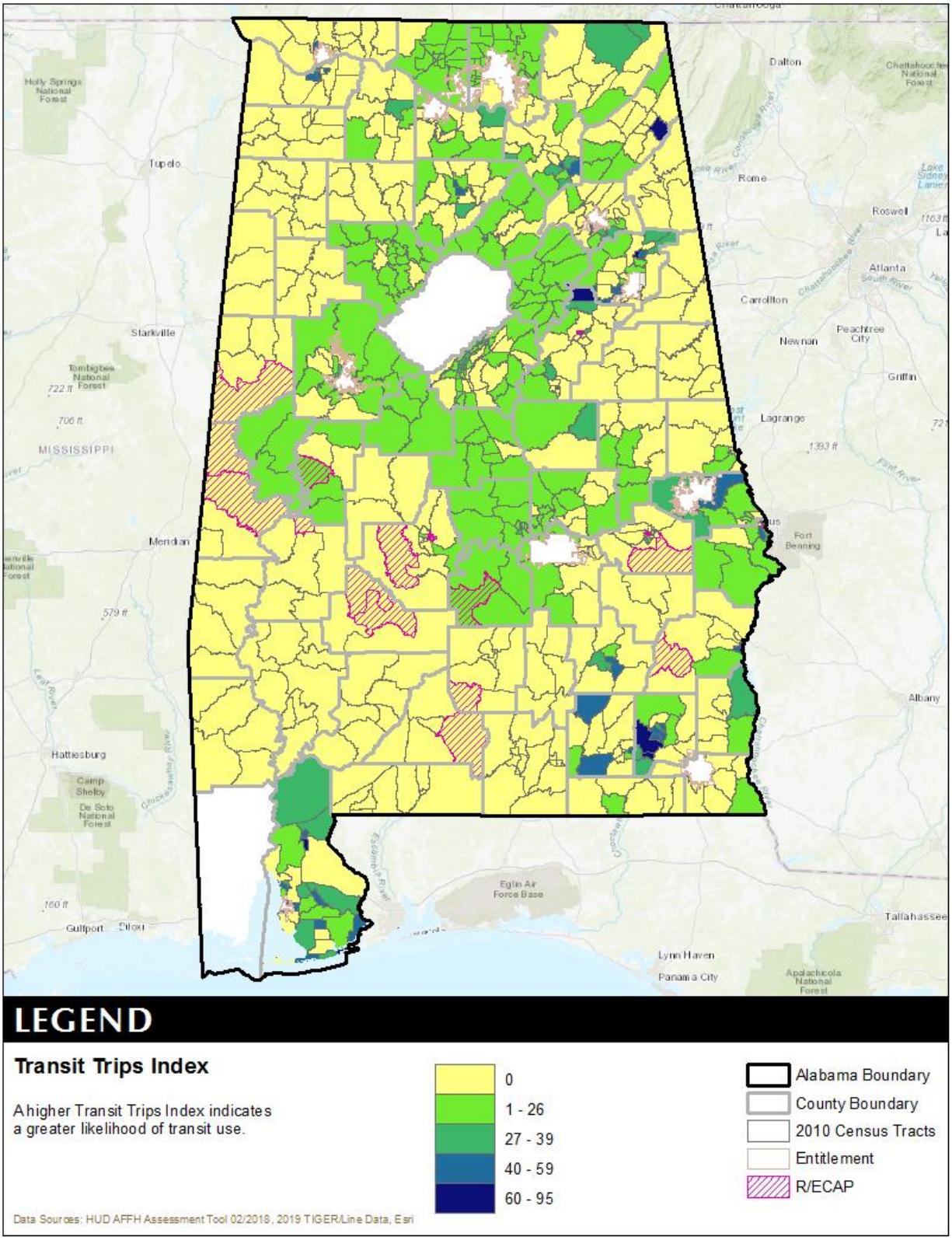
The Environmental Health Index measures exposure based on EPA estimates of air quality carcinogenic, respiratory and neurological toxins by neighborhood.

The more rural parts of the Non-Entitlement Areas of the State had the highest environmental health index ratings. Area closer to the city centers had lower index ratings.

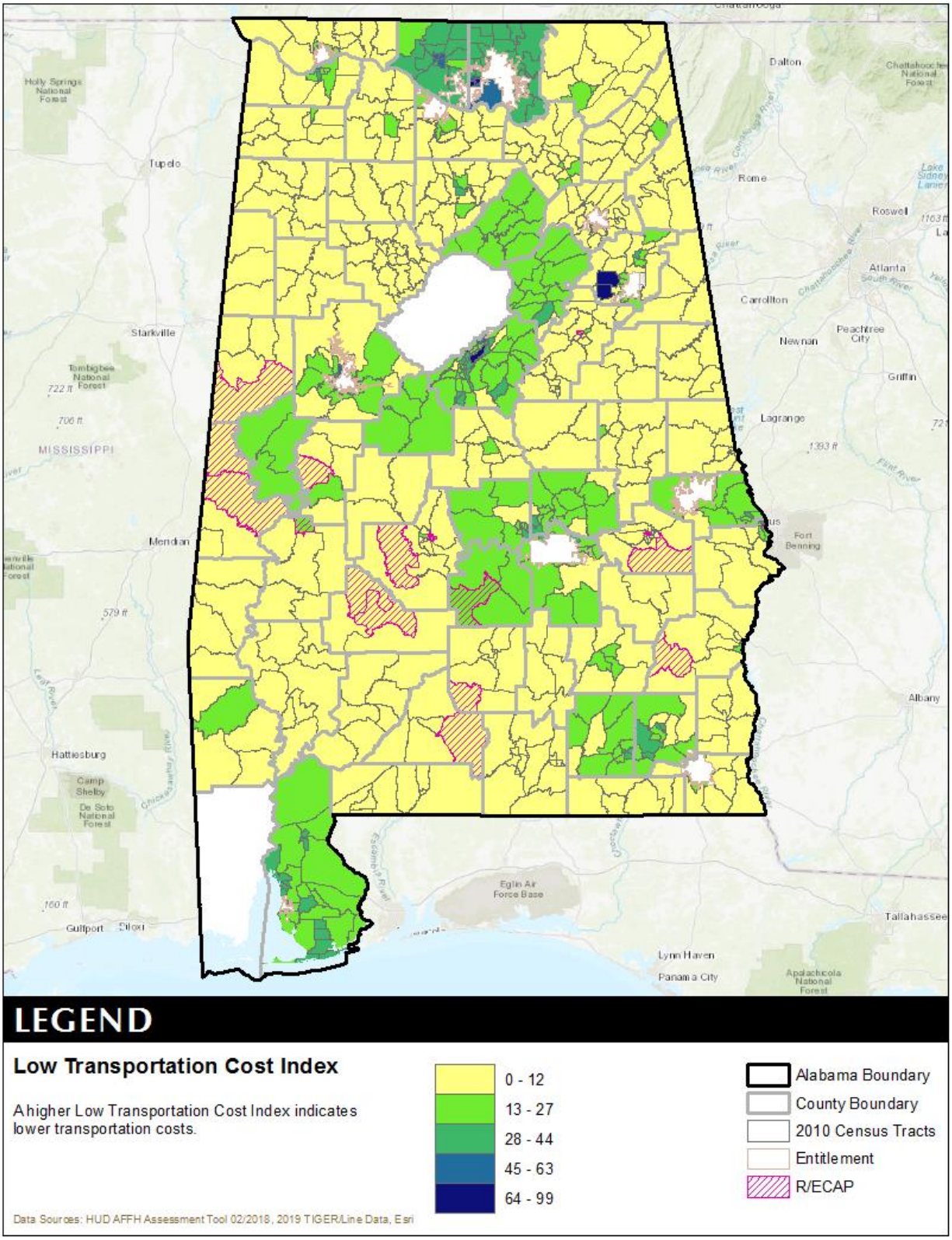
Patterns in Disparities in Access to Opportunity

The degree to which residents had access to low poverty areas, school proficiency, and labor market engagement differed depending on their race or ethnicity, particularly resulting in lower index ratings for black, Native American, and Hispanic households in the Non-Entitlement Areas of Alabama. Other measures of opportunity (school proficiency, use of public transit, transportation costs, and environmental quality) did not differ dramatically by race or ethnicity.

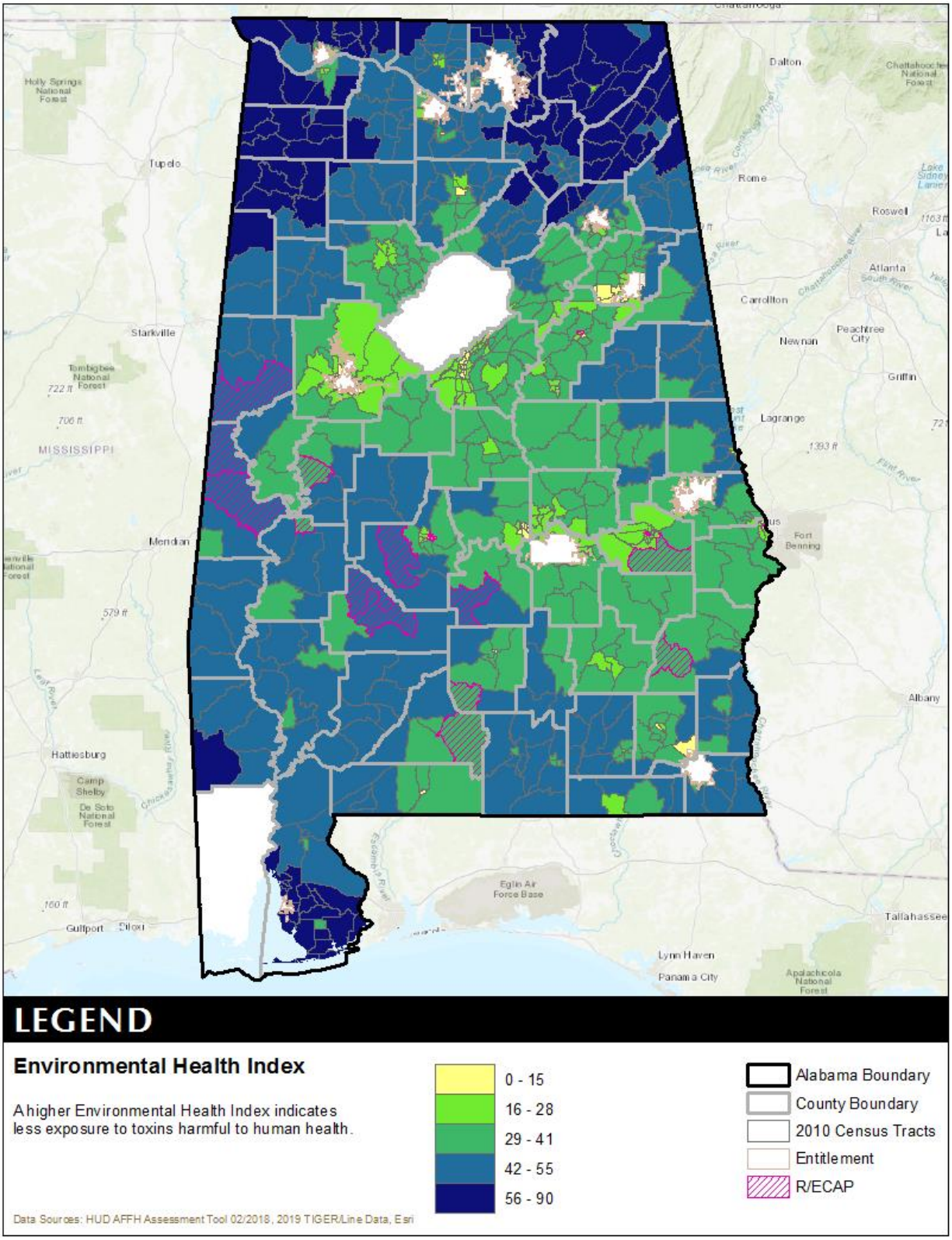
Map IV.12
Transit Trips
State of Alabama Non-Entitlement Areas
HUD AFFH Database



Map IV.13
Transportation Cost
State of Alabama Non-Entitlement Areas
HUD AFFH Database



Map IV.14
Environmental Health
State of Alabama Non-Entitlement Areas
HUD AFFH Database



E. Disproportionate Housing Needs

The Census Bureau collects data on several topics that HUD has identified as "housing problems". For the purposes of this report, housing problems include overcrowding, incomplete plumbing or kitchen facilities, and cost-burden.

Overcrowding is defined as having from 1.1 to 1.5 people per room per residence, with severe overcrowding defined as having more than 1.5 people per room. Households with overcrowding are shown in Table IV.40. In 2017, an estimated 1.2 percent of households were overcrowded, and an additional 0.5 percent were severely overcrowded.

Table IV.40
Overcrowding and Severe Overcrowding
State of Alabama Non-Entitlement
2010 & 2017 Five-Year ACS Data

Data Source	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
Owner							
2010 Five-Year ACS	818,897	98.7%	8,397	1%	2,271	0.3%	829,565
2017 Five-Year ACS	814,511	98.8%	7,020	0.9%	2,520	0.3%	824,051
Renter							
2010 Five-Year ACS	252,686	96.2%	7,483	2.8%	2,442	0.9%	262,611
2017 Five-Year ACS	281,067	96.6%	6,641	2.3%	3,385	1.2%	291,093
Total							
2010 Five-Year ACS	1,071,583	98.1%	15,880	1.5%	4,713	0.4%	1,092,176
2017 Five-Year ACS	1,095,578	98.2%	13,661	1.2%	5,905	0.5%	1,115,144

Incomplete plumbing and kitchen facilities are another indicator of potential housing problems. According to the Census Bureau, a housing unit is classified as lacking complete plumbing facilities when any of the following are not present: piped hot and cold water, a flush toilet, and a bathtub or shower. Likewise, a unit is categorized as deficient when any of the following are missing from the kitchen: a sink with piped hot and cold water, a range or cook top and oven, and a refrigerator. This data is displayed in Table IV.41 and Table IV.42.

There were a total of 4,162 households with incomplete plumbing facilities in 2017, representing 0.4 percent of households in the State of Alabama Non-Entitlement. This is compared to 0.5 percent of households lacking complete plumbing facilities in 2010.

Table IV.41
Households with Incomplete Plumbing Facilities
2010 and 2017 Five-Year ACS Data

Households	2010 Five-Year ACS	2017 Five-Year ACS
With Complete Plumbing Facilities	1,086,416	1,110,982
Lacking Complete Plumbing Facilities	5,760	4,162
Total Households	**1,092,176**	**1,115,144**
Percent Lacking	**0.5%**	**0.4%**

There were 7,054 households lacking complete kitchen facilities in 2017, compared to 6,746 households in 2010. This was a change from 0.6 percent of households in 2010 to 0.6 percent in 2017.

Table IV.42
Households with Incomplete Kitchen Facilities
State of Alabama Non-Entitlement
2010 and 2017 Five-Year ACS Data

Households	2010 Five-Year ACS	2017 Five-Year ACS
With Complete Kitchen Facilities	1,085,430	1,108,090
Lacking Complete Kitchen Facilities	6,746	7,054
Total Households	**1,092,176**	**1,115,144**
Percent Lacking	**0.6%**	**0.6%**

Cost burden is defined as gross housing costs that range from 30 to 50 percent of gross household income; severe cost burden is defined as gross housing costs that exceed 50 percent of gross household income. For homeowners, gross housing costs include property taxes, insurance, energy payments, water and sewer service, and refuse collection. If the homeowner has a mortgage, the determination also includes principal and interest payments on the mortgage loan. For renters, this figure represents monthly rent and selected electricity and natural gas energy charges.

As seen in Table IV.43, in the State of Alabama Non-Entitlement 13.2 percent of households had a cost burden and 10.3 percent had a severe cost burden. Some 20 percent of renters were cost burdened, and 17.8 percent were severely cost burdened. Owner-occupied households without a mortgage had a cost burden rate of 6.4 percent and a severe cost burden rate of 4.6 percent. Owner occupied households with a mortgage had a cost burden rate of 14.6 percent, and severe cost burden at 10.2 percent.

Table IV.43
Cost Burden and Severe Cost Burden by Tenure
State of Alabama Non-Entitlement
2010 & 2017 Five-Year ACS Data

Data Source	Less Than 30%		31%-50%		Above 50%		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage									
2010 Five-Year ACS	339,277	70.9%	84,649	17.7%	52,311	10.9%	2,322	0.5%	478,559
2017 Five-Year ACS	331,863	74.4%	65,194	14.6%	45,607	10.2%	3,264	0.7%	445,928
Owner Without a Mortgage									
2010 Five-Year ACS	298,461	85%	27,830	7.9%	19,545	5.6%	5,170	1.5%	351,006
2017 Five-Year ACS	328,931	87%	24,159	6.4%	17,509	4.6%	7,524	2%	378,123
Renter									
2010 Five-Year ACS	113,133	43.1%	50,843	19.4%	48,614	18.5%	50,021	19%	262,611
2017 Five-Year ACS	127,607	43.8%	58,340	20%	51,888	17.8%	53,258	18.3%	291,093
Total									
2010 Five-Year ACS	750,871	68.8%	163,322	15%	120,470	11%	57,513	5.3%	1,092,176
2017 Five-Year ACS	788,401	70.7%	147,693	13.2%	115,004	10.3%	64,046	5.7%	1,115,144

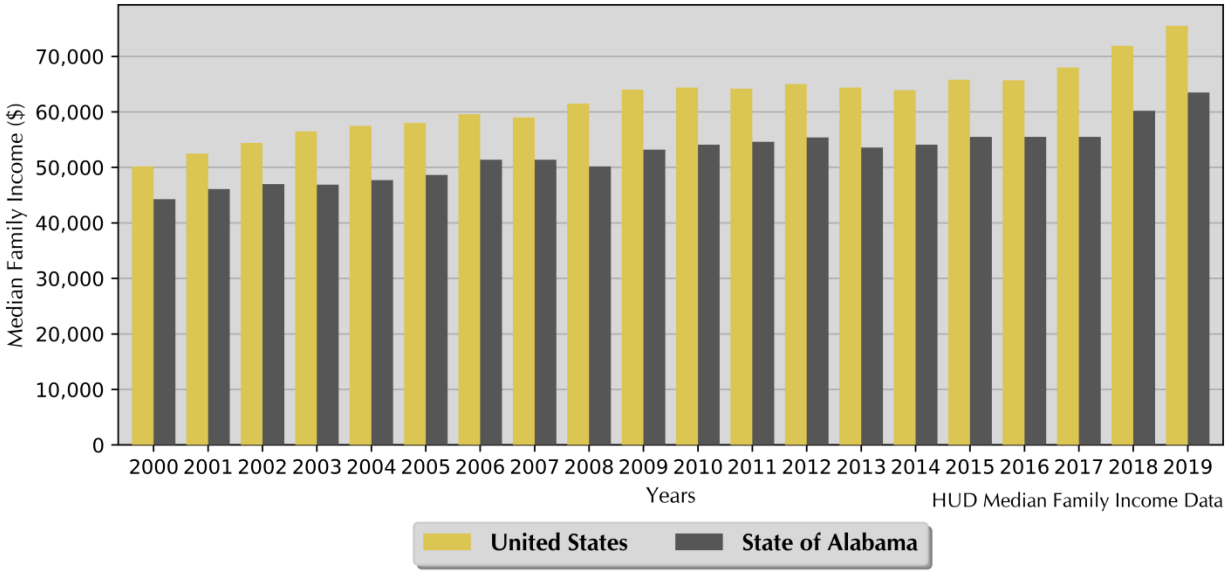
Housing Problems by Income

Very low-income renters are those who earn less than 50 percent of the area median income (AMI), and include a significant proportion of extremely low-income renters (who earn less than 30 percent of AMI). Households with worst case needs are defined as very low-income renters who do not receive government housing assistance and who pay more than 50 percent of their income for rent, live in severely inadequate conditions, or both. Table IV.44 shows that the HUD estimated MFI for the State of Alabama Non-Entitlement was $60,200 in 2018. This compared to the State of Alabama's MFI of $60,200. Diagram IV.12, illustrates the estimated MFI for 2000 through 2018.

Table IV.44
Median Family Income
State of Alabama Non-Entitlement
2000–2018 HUD MFI

Year	MFI	State of Alabama MFI
2000	44,300	44,300
2001	46,100	46,100
2002	47,000	47,000
2003	46,900	46,900
2004	47,700	47,700
2005	48,650	48,650
2006	51,400	51,400
2007	51,400	51,400
2008	50,200	50,200
2009	53,200	53,200
2010	54,100	54,100
2011	54,600	54,600
2012	55,400	55,400
2013	53,600	53,600
2014	54,100	54,100
2015	55,500	55,500
2016	55,500	55,500
2017	55,500	55,500
2018	60,200	60,200

Diagram IV.12
Estimated Median Family Income
State of Alabama vs. United States
HUD Data: 2000 - 2019



As seen in Table IV.45, the most common housing problem tends to be housing cost burdens. More than 137,836 households have a cost burden and 110,950 have a severe cost burden. Some 52,861 renter households are impacted by cost burdens, and 47,579 are impacted by severe cost burdens. On the other hand, some 84,975 owner-occupied households have cost burdens, and 63,371 have severe cost burdens.

There are a total of 84,975 owner-occupied and 52,861 renter-occupied households with a cost burden of greater than 30 percent and less than 50 percent. An additional 63,371 owner-occupied 47,579 renter-occupied households had a cost burden greater than 50 percent of income. Overall there are 812,050 households without a housing problem.

Table IV.45
Percent of Housing Problems by Income and Tenure
State of Alabama Non-Entitlement
2012–2016 HUD CHAS Data

Housing Problem	$0 to $19,050	$19,051 to $31,750	$31,751 to $50,800	$50,801 to $63,500	Above $63,500	Total
Owner-Occupied						
Lacking complete plumbing or kitchen facilities	47.7%	40.3%	53.6%	42.2%	62.7%	50.8%
Severely Overcrowded with > 1.51 people per room (and complete kitchen and plumbing)	22.1%	27.2%	43%	28.2%	78%	42.5%
Overcrowded - With 11-1.5 people per room (and none of the above problems)	29.8%	41.1%	51.5%	51%	70.6%	50.4%
Housing cost burden greater that 50% of income (and none of the above problems)	47.8%	60.3%	86.1%	95.2%	93.3%	57.1%
Housing cost burden greater than 30% of income (and none of the above problems)	55.6%	46.3%	58.7%	79.9%	94.5%	61.6%
Zero/negative income (and none of the above problems)	47.6%	%	%	%	%	47.6%
Has none of the 4 housing problems	45.9%	70.4%	70.1%	76.3%	85.9%	79.7%
Total	48%	60.1%	67.9%	76.2%	86%	73.8%
Renter-Occupied						
Lacking complete plumbing or kitchen facilities	52.3%	59.7%	46.4%	57.8%	37.3%	49.2%
Severely Overcrowded with > 1.51 people per room (and complete kitchen and plumbing)	77.9%	72.8%	57%	71.8%	22%	57.5%
Overcrowded - With 11-1.5 people per room (and none of the above problems)	70.2%	58.9%	48.5%	49%	29.4%	49.6%
Housing cost burden greater that 50% of income (and none of the above problems)	52.2%	39.7%	13.9%	4.8%	6.7%	42.9%
Housing cost burden greater than 30% of income (and none of the above problems)	44.4%	53.7%	41.3%	20.1%	5.5%	38.4%
Zero/negative income (and none of the above problems)	52.4%	%	%	%	%	52.4%
Has none of the 4 housing problems	54.1%	29.6%	29.9%	23.7%	14.1%	20.3%
Total	**52%**	**39.9%**	**32.1%**	**23.8%**	**14%**	**26.2%**

Table IV.46
Housing Problems by Income and Tenure
State of Alabama Non-Entitlement
2012–2016 HUD CHAS Data

Housing Problem	$0 to $19,050	$19,051 to $31,750	$31,751 to $50,800	$50,801 to $63,500	Above $63,500	Total
Owner-Occupied						
Lacking complete plumbing or kitchen facilities	1,371	602	866	336	1,416	4,591
Severely Overcrowded with > 1.51 people per room (and complete kitchen and plumbing)	315	255	605	191	1,143	2,509
Overcrowded - With 11-1.5 people per room (and none of the above problems)	776	888	1,632	862	2,435	6,593
Housing cost burden greater that 50% of income (and none of the above problems)	31,745	16,795	10,230	2,305	2,296	63,371
Housing cost burden greater than 30% of income (and none of the above problems)	11,900	19,045	24,800	11,195	18,035	84,975
Zero/negative income (and none of the above problems)	10,330	0	0	0	0	10,330
Has none of the 4 housing problems	13,025	44,980	91,115	68,015	430,080	647,215
Total	**69,462**	**82,565**	**129,248**	**82,904**	**455,405**	**819,584**
Renter-Occupied						
Lacking complete plumbing or kitchen facilities	1,506	890	750	460	841	4,447
Severely Overcrowded with > 1.51 people per room (and complete kitchen and plumbing)	1,110	681	801	486	322	3,400
Overcrowded - With 11-1.5 people per room (and none of the above problems)	1,825	1,275	1,535	827	1,015	6,477
Housing cost burden greater that 50% of income (and none of the above problems)	34,600	11,040	1,656	117	166	47,579
Housing cost burden greater than 30% of income (and none of the above problems)	9,485	22,085	17,415	2,825	1,051	52,861
Zero/negative income (and none of the above problems)	11,385	0	0	0	0	11,385
Has none of the 4 housing problems	15,340	18,890	38,920	21,150	70,535	164,835
Total	**75,251**	**54,861**	**61,077**	**25,865**	**73,930**	**290,984**
Total						
Lacking complete plumbing or kitchen facilities	2,877	1,492	1,616	796	2,257	9,038
Severely Overcrowded with > 1.51 people per room (and complete kitchen and plumbing)	1,425	936	1,406	677	1,465	5,909
Overcrowded - With 11-1.5 people per room (and none of the above problems)	2,601	2,163	3,167	1,689	3,450	13,070
Housing cost burden greater that 50% of income (and none of the above problems)	66,345	27,835	11,886	2,422	2,462	110,950
Housing cost burden greater than 30% of income (and none of the above problems)	21,385	41,130	42,215	14,020	19,086	137,836
Zero/negative income (and none of the above problems)	21,715	0	0	0	0	21,715
Has none of the 4 housing problems	28,365	63,870	130,035	89,165	500,615	812,050
Total	**144,713**	**137,426**	**190,325**	**108,769**	**529,335**	**1,110,568**

Housing Problems by Race and Ethnicity

The following Tables show households with housing problems by race/ethnicity. These Tables can be used to determine if there is a disproportionate housing need for any racial or ethnic groups. If any racial/ethnic group faces housing problems at a rate of ten percentage points or high than the jurisdiction average, then they have a disproportionate share of housing problems.

Overall, there are 276,745 households with housing problems in the State of Alabama Non-Entitlement. This includes 73,426 black households, 1,912 Asian households, 1,544 American Indian, 52 Pacific Islander, and 4,236 "other" race households with housing problems. As for ethnicity, there are 10,944 Hispanic households with housing problems. This is shown in Table IV.47. Black households have a disproportionate share of housing problems, at 37.4 percent compared to the 24.9 percent for households overall. Hispanic households also have a disproportionate rate of housing problems at 37.9 percent.

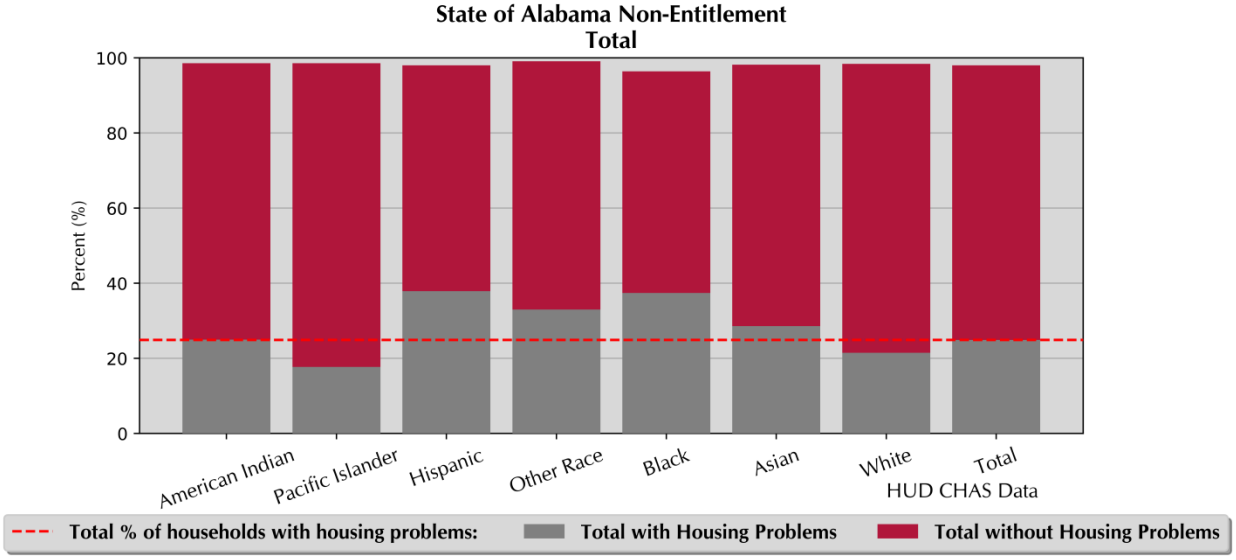
Table IV.47
Percent of Total Households with Housing Problems by Income and Race
State of Alabama Non-Entitlement
2012–2016 HUD CHAS Data

Income	Non-Hispanic by Race						Hispanic (Any Race)	Total
	White	Black	Asian	American Indian	Pacific Islander	Other Race		
With Housing Problems								
$0 to $19,050	63.3%	68.1%	71.2%	76.8%	89.2%	67.7%	75.9%	65.4%
$19,051 to $31,750	50.3%	60%	78.6%	40%	78.9%	66.9%	66.1%	53.5%
$31,751 to $50,800	29.5%	38.2%	36.6%	23.7%	4.7%	44%	37.4%	31.7%
$50,801 to $63,500	17%	21.5%	21.7%	14.9%	0%	27.3%	21%	18%
Above $63,500	5.2%	6.3%	12.4%	6%	0%	5.9%	8.6%	5.4%
Total	**21.5%**	**37.4%**	**28.6%**	**25%**	**17.7%**	**33%**	**37.9%**	**24.9%**
Without Housing Problems								
$0 to $19,050	21.6%	16.6%	12.1%	13.7%	0%	25.9%	10.5%	19.6%
$19,051 to $31,750	49.7%	40%	21.4%	60%	21.1%	33.1%	33.9%	46.5%
$31,751 to $50,800	70.5%	61.8%	63.4%	76.3%	95.3%	56%	62.6%	68.3%
$50,801 to $63,500	83%	78.5%	78.3%	85.1%	100%	72.7%	79%	82%
Above $63,500	94.8%	93.7%	87.6%	94%	100%	94.1%	91.4%	94.6%
Total	**76.9%**	**59%**	**69.6%**	**73.6%**	**80.9%**	**66.1%**	**60.1%**	**73.1%**

Table IV.48
Total Households with Housing Problems by Income and Race
State of Alabama Non-Entitlement
2012–2016 HUD CHAS Data

Income	Non-Hispanic by Race						Hispanic (Any Race)	Total
	White	Black	Asian	American Indian	Pacific Islander	Other Race		
With Housing Problems								
$0 to $19,050	57,055	31,726	511	739	33	1,211	3,352	94,627
$19,051 to $31,750	48,240	19,465	481	317	15	1,297	3,745	73,560
$31,751 to $50,800	41,815	14,475	286	232	4	1,073	2,395	60,280
$50,801 to $63,500	14,515	3,855	157	80	0	332	647	19,586
Above $63,500	23,006	3,905	477	176	0	323	805	28,692
Total	**184,631**	**73,426**	**1,912**	**1,544**	**52**	**4,236**	**10,944**	**276,745**
Total								
$0 to $19,050	90,170	46,621	718	962	37	1,788	4,418	144,714
$19,051 to $31,750	95,965	32,455	612	793	19	1,940	5,662	137,446
$31,751 to $50,800	141,710	37,895	781	979	86	2,437	6,406	190,294
$50,801 to $63,500	85,200	17,970	723	536	50	1,214	3,088	108,781
Above $63,500	446,056	61,580	3,857	2,916	101	5,453	9,340	529,303
Total	**859,101**	**196,521**	**6,691**	**6,186**	**293**	**12,832**	**28,914**	**1,110,538**

Diagram IV.13
Total Housing Problems by Race



In the State of Alabama Non-Entitlement, 35,601 Black homeowner households face housing problems at a rate of 30.9 percent, and 4,328 Hispanic homeowner households face housing problems, at a rate of 28.8 percent.

Table IV.49
Percent of Homeowner Households with Housing Problems by Income and Race
State of Alabama Non-Entitlement
2012–2016 HUD CHAS Data

Income	Non-Hispanic by Race						Hispanic (Any Race)	Total
	White	Black	Asian	American Indian	Pacific Islander	Other Race		
With Housing Problems								
$0 to $19,050	63.9%	71.9%	78.2%	78.4%	80%	71.2%	74.7%	66.4%
$19,051 to $31,750	42.5%	54.1%	54.9%	40.2%	0%	62.3%	54.5%	45.5%
$31,751 to $50,800	27.8%	36.4%	37.8%	21.7%	0%	36.8%	35.8%	29.5%
$50,801 to $63,500	17%	22.1%	22.1%	15.4%	0%	27.7%	18.3%	17.9%
Above $63,500	5.3%	7.1%	11.6%	6.7%	0%	6.2%	8.1%	5.6%
Total	**17.6%**	**30.9%**	**22%**	**20.9%**	**7.4%**	**25.7%**	**28.8%**	**19.8%**
Without Housing Problems								
$0 to $19,050	20.2%	15.4%	13.4%	17.7%	0%	18.5%	13.4%	18.8%
$19,051 to $31,750	57.5%	45.9%	45.1%	59.8%	100%	37.7%	45.5%	54.5%
$31,751 to $50,800	72.2%	63.6%	62.2%	78.3%	100%	63.2%	64.2%	70.5%
$50,801 to $63,500	83%	77.9%	77.9%	84.6%	100%	72.3%	81.7%	82.1%
Above $63,500	94.7%	92.9%	88.4%	93.3%	100%	93.8%	91.9%	94.4%
Total	**81.3%**	**67.2%**	**77.5%**	**78.7%**	**90.7%**	**73.5%**	**69.9%**	**79.0%**

Diagram IV.14
Owner Housing Problems by Race

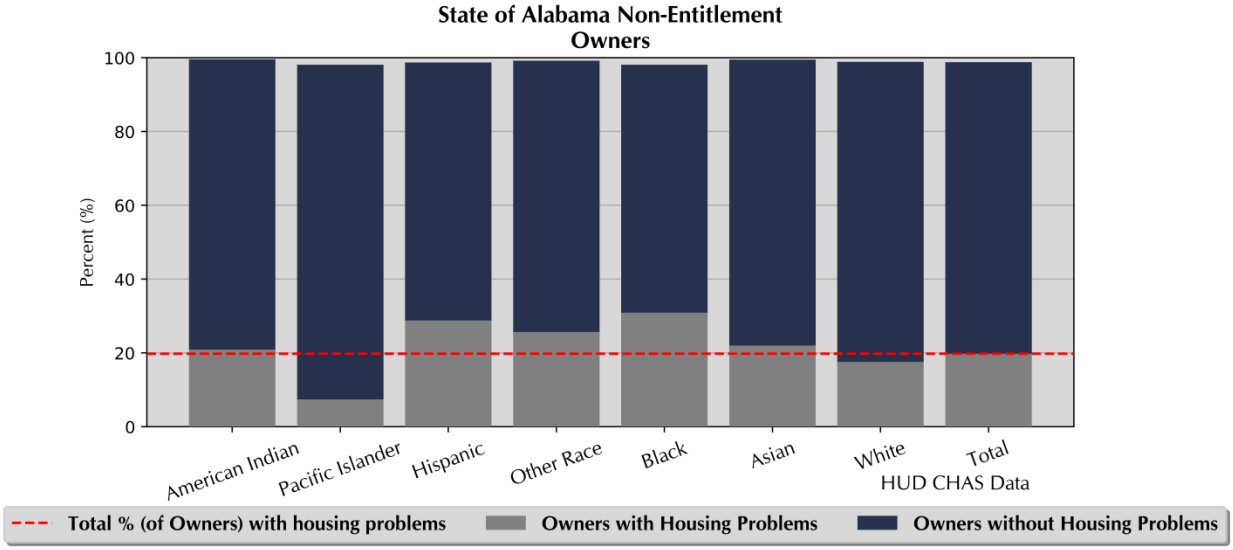


Table IV.50
Homeowner Households with Housing Problems by Income and Race
State of Alabama Non-Entitlement
2012–2016 HUD CHAS Data

Income	Non-Hispanic by Race						Hispanic (Any Race)	Total
	White	Black	Asian	American Indian	Pacific Islander	Other Race		
With Housing Problems								
$0 to $19,050	31,235	12,576	186	402	16	501	1,172	46,088
$19,051 to $31,750	26,130	9,205	135	216	0	656	1,245	37,587
$31,751 to $50,800	28,355	7,825	155	142	0	552	1,095	38,124
$50,801 to $63,500	11,495	2,630	136	75	0	226	291	14,853
Above $63,500	20,655	3,365	311	176	0	282	525	25,314
Total	**117,870**	**35,601**	**923**	**1,011**	**16**	**2,217**	**4,328**	**161,966**
Total								
$0 to $19,050	48,900	17,501	238	513	20	704	1,569	69,445
$19,051 to $31,750	61,425	17,015	246	537	4	1,053	2,286	82,566
$31,751 to $50,800	102,065	21,470	410	653	71	1,500	3,056	129,225
$50,801 to $63,500	67,455	11,900	616	486	30	817	1,586	82,890
Above $63,500	391,480	47,425	2,676	2,646	90	4,552	6,505	455,374
Total	**671,325**	**115,311**	**4,186**	**4,835**	**215**	**8,626**	**15,002**	**819,500**

In total, some 114,779 renter households face housing problems in the State of Alabama Non-Entitlement. Of these, some 37,825 black households, at a rate of 46.6 percent households, and 6,616 Hispanic renter households face housing problems, at a rate of 39.4 percent. All the renter households in the Non-Entitlement Areas face housing problems at a rate of 39.4 percent.

Table IV.51
Percent of Renter Households with Housing Problems by Income and Race
State of Alabama Non-Entitlement
2012–2016 HUD CHAS Data

Income	Non-Hispanic by Race						Hispanic (Any Race)	Total
	White	Black	Asian	American Indian	Pacific Islander	Other Race		
With Housing Problems								
$0 to $19,050	62.6%	65.8%	67.7%	75.1%	100%	65.5%	76.5%	64.5%
$19,051 to $31,750	64%	66.5%	94.5%	39.5%	100%	72.3%	74.1%	65.5%
$31,751 to $50,800	34%	40.5%	35.3%	27.6%	26.7%	55.6%	38.8%	36.3%
$50,801 to $63,500	17%	20.2%	19.6%	10%	0%	26.7%	23.7%	18.3%
Above $63,500	4.3%	3.8%	14.1%	0%	0%	4.6%	9.9%	4.6%
Total	**35.6%**	**46.6%**	**39.5%**	**39.5%**	**46.2%**	**48%**	**47.6%**	**39.4%**
Without Housing Problems								
$0 to $19,050	23.3%	17.3%	11.5%	9.1%	0%	30.7%	8.9%	20.4%
$19,051 to $31,750	36%	33.5%	5.5%	60.5%	0%	27.7%	25.9%	34.5%
$31,751 to $50,800	66%	59.5%	64.7%	72.4%	73.3%	44.4%	61.2%	63.7%
$50,801 to $63,500	83%	79.8%	80.4%	90%	100%	73.3%	76.3%	81.7%
Above $63,500	95.7%	96.2%	85.9%	100%	100%	95.4%	90.1%	95.4%
Total	**61.3%**	**47.3%**	**56.5%**	**55.3%**	**53.8%**	**51%**	**49.5%**	**56.7%**

Diagram IV.15
Renter Housing Problems by Race

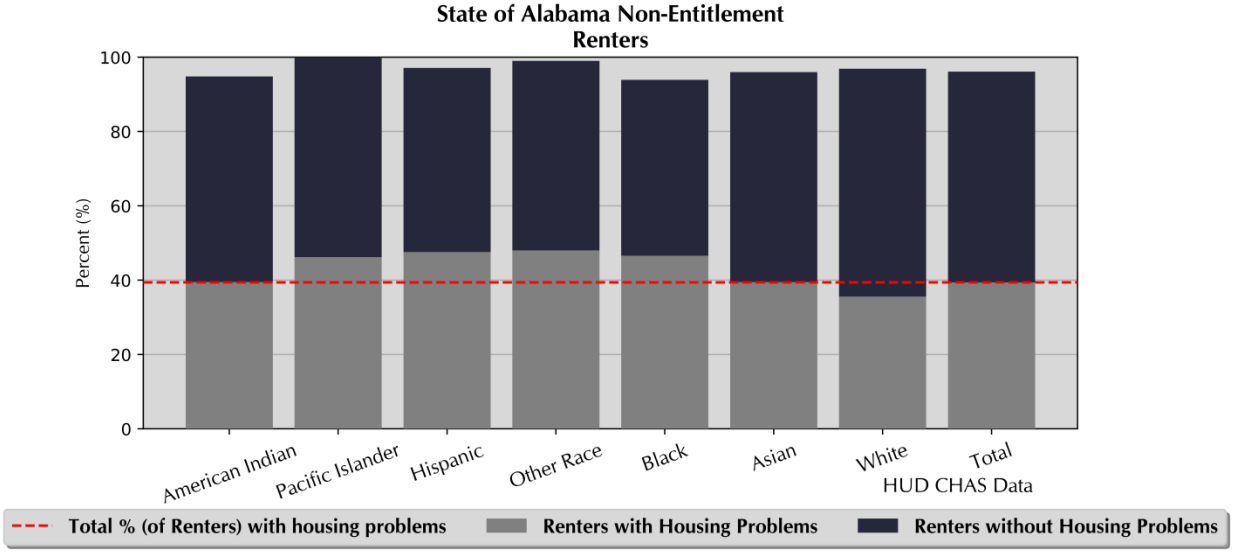


Table IV.52
Renter Households with Housing Problems by Income and Race
State of Alabama Non-Entitlement
2012–2016 HUD CHAS Data

Income	Non-Hispanic by Race						Hispanic (Any Race)	Total
	White	Black	Asian	American Indian	Pacific Islander	Other Race		
With Housing Problems								
$0 to $19,050	25,820	19,150	325	337	17	710	2,180	**48,539**
$19,051 to $31,750	22,110	10,260	346	101	15	641	2,500	**35,973**
$31,751 to $50,800	13,460	6,650	131	90	4	521	1,300	**22,156**
$50,801 to $63,500	3,020	1,225	21	5	0	106	356	**4,733**
Above $63,500	2,351	540	166	0	0	41	280	**3,378**
Total	**66,761**	**37,825**	**989**	**533**	**36**	**2,019**	**6,616**	**114,779**
Total								
$0 to $19,050	41,270	29,120	480	449	17	1,084	2,849	**75,269**
$19,051 to $31,750	34,540	15,440	366	256	15	887	3,376	**54,880**
$31,751 to $50,800	39,645	16,425	371	326	15	937	3,350	**61,069**
$50,801 to $63,500	17,745	6,070	107	50	20	397	1,502	**25,891**
Above $63,500	54,576	14,155	1,181	270	11	901	2,835	**73,929**
Total	**187,776**	**81,210**	**2,505**	**1,351**	**78**	**4,206**	**13,912**	**291,038**

These racial/ethnic groups were also disproportionately impacted by severe housing problems, as seen in Table IV.53. Severe housing problems include overcrowding at a rate of more than 1.5 persons per room and housing costs exceeding 50 percent of the household income. Some 40,057 black homeowner households face severe housing problems, as well as 903 Asian homeowner households, and 2,886 Hispanic homeowner households.

Table IV.53
Percent of Homeowner Households with Severe Housing Problems by Income and Race
State of Alabama Non-Entitlement
2012–2016 HUD CHAS Data

Income	Non-Hispanic by Race						Hispanic (Any Race)	Total
	White	Black	Asian	American Indian	Pacific Islander	Other Race		
With A Severe Housing Problem								
$0 to $19,050	46%	57.2%	45.3%	55.3%	80%	52.7%	56.9%	49.2%
$19,051 to $31,750	20.4%	27.6%	32.5%	14.9%	0%	33.8%	34.4%	22.5%
$31,751 to $50,800	9.5%	12%	19.5%	10.7%	0%	15.2%	21.1%	10.3%
$50,801 to $63,500	4.1%	5.3%	5.9%	2.1%	0%	8.7%	11.1%	4.4%
Above $63,500	1.5%	1.9%	2.3%	2.8%	0%	3.2%	5.9%	1.6%
Total	**7.9%**	**16.3**	**8.7%**	**10.8%**	**7.4%**	**13.6%**	**19.2%**	**9.4%**
Without A Severe Housing Problems								
$0 to $19,050	38%	30%	46.2%	40.8%	0%	36.9%	31.3%	35.9%
$19,051 to $31,750	79.6%	72.4%	67.5%	85.1%	100%	66.2%	65.6%	77.5%
$31,751 to $50,800	90.5%	88%	80.5%	89.3%	100%	84.8%	78.9%	89.7%
$50,801 to $63,500	95.9%	94.7%	94.1%	97.9%	100%	91.3%	88.9%	95.6%
Above $63,500	98.5%	98.1%	97.7%	97.2%	100%	96.8%	94.1%	98.4%
Total	**90.9%**	**81.7%**	**90.8%**	**88.8%**	**90.7%**	**85.6%**	**79.5%**	**89.3%**

Table IV.54
Percent of Renter Households with Severe Housing Problems by Income and Race
State of Alabama Non-Entitlement
2012–2016 HUD CHAS Data

Income	Non-Hispanic by Race						Hispanic (Any Race)	Total
	White	Black	Asian	American Indian	Pacific Islander	Other Race		
With A Severe Housing Problem								
$0 to $19,050	50.2%	52.7%	64.6%	59.2%	100%	49%	65.1%	51.9%
$19,051 to $31,750	25%	23.3%	19.7%	22.3%	100%	29%	37.6%	25.3%
$31,751 to $50,800	6.6%	8.7%	6.7%	6%	0%	10.7%	16.5%	7.8%
$50,801 to $63,500	5.9%	8.3%	17.3%	7.4%	0%	15.2%	18%	7.3%
Above $63,500	2.9%	2.3%	9.9%	0%	0%	4.6%	9.5%	3.2%
Total	**18.4%**	**26.1%**	**21.6%**	**25.6%**	**40.5%**	**23.5%**	**30.3%**	**21.3%**
Without A Severe Housing Problems								
$0 to $19,050	35.7%	30.3%	14.6%	25.1%	0%	47.2%	20.3%	33%
$19,051 to $31,750	75%	76.7%	80.3%	77.7%	0%	71%	62.4%	**74.7%**
$31,751 to $50,800	93.4%	91.3%	93.3%	94%	100%	89.3%	83.5%	**92.2%**
$50,801 to $63,500	94.1%	91.7%	82.7%	92.6%	100%	84.8%	82%	**92.7%**
Above $63,500	97.1%	97.7%	90.1%	100%	100%	95.4%	90.5%	**96.8%**
Total	**78.5%**	**67.8%**	**74.3%**	**69.2%**	**40.5%**	**75.6%**	**66.7%**	**74.8%**

Table IV.55
Percent of Total Households with Severe Housing Problems by Income and Race
State of Alabama Non-Entitlement
2012–2016 HUD CHAS Data

Income	Non-Hispanic by Race						Hispanic (Any Race)	Total
	White	Black	Asian	American Indian	Pacific Islander	Other Race		
With A Severe Housing Problem								
$0 to $19,050	47.9%	54.4%	58.3%	57.1%	89.2%	50.4%	62.1%	50.6%
$19,051 to $31,750	22%	25.6%	24.9%	17.3%	78.9%	31.6%	36.3%	23.6%
$31,751 to $50,800	8.7%	10.6%	13.4%	9.1%	0%	13.5%	18.7%	9.5%
$50,801 to $63,500	4.5%	6.3%	7.5%	2.6%	0%	10.8%	14.4%	5.1%
Above $63,500	1.6%	2%	4.6%	2.6%	0%	3.4%	7%	1.8%
Total	**10.2%**	**20.4%**	**13.5%**	**14%**	**16.3%**	**16.8%**	**24.5%**	**12.5%**
Without A Severe Housing Problems								
$0 to $19,050	36.9%	30.2%	24.9%	33.5%	0%	43.1%	24.2%	34.4%
$19,051 to $31,750	78%	74.4%	75.1%	82.7%	21.1%	68.4%	63.7%	76.4%
$31,751 to $50,800	91.3%	89.4%	86.6%	90.9%	100%	86.5%	81.3%	90.5%
$50,801 to $63,500	95.5%	93.7%	92.5%	97.4%	100%	89.2%	85.6%	94.9%
Above $63,500	98.4%	98%	95.4%	97.4%	100%	96.6%	93%	98.2%
Total	**88.2%**	**76%**	**84.7%**	**84.5%**	**82.3%**	**82.3%**	**73.4%**	**85.5%**

Table IV.56
Total Households with Severe Housing Problems by Income and Race
State of Alabama Non-Entitlement
2012–2016 HUD CHAS Data

Income	Non-Hispanic by Race						Hispanic (Any Race)	Total
	White	Black	Asian	American Indian	Pacific Islander	Other Race		
With A Severe Housing Problem								
$0 to $19,050	43,225	25,381	416	553	33	897	2,742	73,247
$19,051 to $31,750	21,150	8,305	151	136	15	611	2,060	32,428
$31,751 to $50,800	12,355	4,010	105	90	0	327	1,200	18,087
$50,801 to $63,500	3,797	1,134	53	14	0	131	446	5,575
Above $63,500	7,300	1,227	178	75	0	188	653	9,621
Total	**87,827**	**40,057**	**903**	**868**	**48**	**2,154**	**7,101**	**138,958**
Without A Severe Housing Problems								
$0 to $19,050	33,310	14,085	178	324	0	767	1,068	49,732
$19,051 to $31,750	74,810	24,145	456	651	4	1,322	3,616	105,004
$31,751 to $50,800	129,360	33,910	680	898	87	2,103	5,211	172,249
$50,801 to $63,500	81,395	16,825	656	526	50	1,080	2,646	103,178
Above $63,500	438,755	60,350	3,680	2,840	101	5,275	8,690	519,691
Total	**757,630**	**149,315**	**5,650**	**5,239**	**242**	**10,547**	**21,231**	**949,854**
Not Computed								
$0 to $19,050	13,615	7,160	120	91	4	114	602	21,706
$19,051 to $31,750	0	0	0	0	0	0	0	0
$31,751 to $50,800	0	0	0	0	0	0	0	0
$50,801 to $63,500	0	0	0	0	0	0	0	0
Above $63,500	0	0	0	0	0	0	0	0
Total	**13,615**	**7,160**	**120**	**91**	**4**	**114**	**602**	**21,706**
Total								
$0 to $19,050	90,150	46,626	714	968	37	1,778	4,412	144,685
$19,051 to $31,750	95,960	32,450	607	787	19	1,933	5,676	137,432
$31,751 to $50,800	141,715	37,920	785	988	87	2,430	6,411	190,336
$50,801 to $63,500	85,192	17,959	709	540	50	1,211	3,092	108,753
Above $63,500	446,055	61,577	3,858	2,915	101	5,463	9,343	529,312
Total	**859,072**	**196,532**	**6,673**	**6,198**	**294**	**12,815**	**28,934**	**1,110,518**

ACCESS TO MORTGAGE FINANCE SERVICES

Congress enacted the Home Mortgage Disclosure Act in 1975, permanently authorizing the law in 1988[10]. The Act requires both depository and non-depository lenders to collect and publicly disclose information about housing-related applications and loans. Under the HMDA, financial institutions are required to report the race, ethnicity, sex, loan amount, and income of mortgage applicants and borrowers by Census tract. Institutions must meet a set of reporting criteria. For depository institutions, these are as follows:

1. The institution must be a bank, credit union, or savings association;
2. The total assets must exceed the coverage threshold;[11]
3. The institution must have had a home or branch office in a Metropolitan Statistical Area (MSA);
4. The institution must have originated or refinanced at least one home purchase loan secured by a first lien on a one- to four-family dwelling;
5. The institution must be federally insured or regulated; and
6. The mortgage loan must have been insured, guaranteed, or supplemented by a federal agency or intended for sale to Fannie Mae or Freddie Mac.

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

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

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

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

For the purposes of this analysis, these flagged originations will be termed predatory, or at least predatory in nature. Overall, the data contained within the HMDA reporting guidelines represent

[10] Prior to that year, Congress had to periodically reauthorize the law.
[11] Each December, the Federal Reserve announces the threshold for the following year. The asset threshold may change from year to year based on changes in the Consumer Price Index for Urban Wage Earners and Clerical Workers.

the best and most complete set of information on home loan applications. This report includes HMDA data from 2008 through 2017, the most recent year for which these data are available.

Table IV.57 shows the purpose of loan by year for the State of Alabama Non-Entitlement Areas from 2008 to 2017. As seen therein, there were over 1,034,703 loans during this time period, of these some 374,978 were for home purchases. In 2017, there were 113,616 loans, of which 57,066 were for home purchases.

Table IV.57
Purpose of Loan by Year
State of Alabama Non-Entitlement
2008–2017 HMDA Data

Purpose	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
Home Purchase	24,314	19,834	19,339	18,540	42,928	46,276	44,349	49,099	53,233	57,066	374,978
Home Improvement	8,264	5,029	4,165	5,573	8,971	9,383	9,374	9,658	10,137	10,960	81,514
Refinancing	47,032	56,670	44,700	38,224	97,501	86,209	45,181	54,816	62,288	45,590	578,211
Total	**79,610**	**81,533**	**68,204**	**62,337**	**149,400**	**141,868**	**98,904**	**113,573**	**125,658**	**113,616**	**1,034,703**

Table IV.58 shows the occupancy status for loan applicants. A vast majority of applicants were or owner-occupied units, accounting for 90.9 percent between 2008 and 2017, and for 91.1 percent in 2017.

Table IV.58
Occupancy Status for Applications
State of Alabama Non-Entitlement
2008–2017 HMDA Data

Status	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
Owner-Occupied	72,297	75,023	63,285	57,111	135,635	127,401	89,012	102,546	114,828	103,556	940,694
Not Owner-Occupied	5,850	5,051	4,793	5,184	13,309	14,171	9,804	10,927	10,700	9,977	89,766
Not Applicable	1,463	1,459	126	42	456	296	88	100	130	83	4,243
Total	**79,610**	**81,533**	**68,204**	**62,337**	**149,400**	**141,868**	**98,904**	**113,573**	**125,658**	**113,616**	**1,034,703**

Owner-occupied home purchase loan applications by loan types are shown in Table IV.59. Between 2008 and 2017, some 41.2 percent of home loan purchases were conventional loans, 28.6 percent were FHA insured, and 15.1 percent were VA Guaranteed, and 15.1 percent were Rural Housing Service or Farm Service Agency.

Table IV.59
Owner-Occupied Home Purchase Loan Applications by Loan Type
State of Alabama Non-Entitlement
2008–2017 HMDA Data

Loan Type	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
Conventional	10,912	6,500	5,781	5,836	14,485	17,263	17,673	18,791	20,490	22,372	140,103
FHA - Insured	6,915	6,164	6,715	5,338	11,498	11,023	9,092	12,260	14,077	14,227	97,309
VA - Guaranteed	2,383	2,667	2,819	2,938	5,610	6,283	6,036	6,680	7,482	8,459	51,357
Rural Housing Service or Farm Service Agency	1,408	2,810	2,451	2,984	7,260	7,292	7,414	6,370	6,321	6,908	51,218
Total	**21,618**	**18,141**	**17,766**	**17,096**	**38,853**	**41,861**	**40,215**	**44,101**	**48,370**	**51,966**	**339,987**

Denial Rates

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

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

As shown in Table IV.60, just over 178,558 home purchase loan applications were originated over the 2008-2017 period, and 30,961 were denied.

Table IV.60
Loan Applications by Action Taken
State of Alabama Non-Entitlement
2008–2017 HMDA Data

Action	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
Loan Originated	10,549	8,301	8,041	7,906	18,956	20,705	21,339	24,385	27,945	30,431	178,558
Application Approved but not Accepted	714	406	349	462	720	887	807	724	884	964	6,917
Application Denied	2,390	1,795	1,890	1,662	3,616	3,882	3,748	3,914	4,020	4,044	30,961
Application Withdrawn by Applicant	1,432	1,146	1,304	1,043	2,491	2,725	2,893	3,231	3,835	4,033	24,133
File Closed for Incompleteness	479	286	273	245	398	733	568	542	618	651	4,793
Loan Purchased by the Institution	6,054	6,151	5,909	5,778	12,665	12,915	10,845	11,289	11,046	11,831	94,483
Preapproval Request Denied	0	53	0	0	4	4	10	7	18	11	107
Preapproval Approved but not Accepted	0	3	0	0	3	10	5	9	4	1	35
Total	**21,618**	**18,141**	**17,766**	**17,096**	**38,853**	**41,861**	**40,215**	**44,101**	**48,370**	**51,966**	**339,987**

The most common reasons cited in the decision to deny one of these loan applications related to the credit history of the prospective homeowner, as shown in Table IV.61. Debt-to-income ratio and collateral were also commonly given as reasons to deny home purchase loans.

Table IV.61
Loan Applications by Reason for Denial
State of Alabama Non-Entitlement
2008–2017 HMDA Data

Denial Reason	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
Debt-to-Income Ratio	278	280	269	181	515	631	660	666	669	689	4,838
Employment History	60	53	54	54	88	82	73	81	101	79	725
Credit History	704	701	521	476	920	966	744	722	728	711	7,193
Collateral	197	177	187	167	320	368	317	327	361	417	2,838
Insufficient Cash	58	46	54	57	101	125	116	161	170	155	1,043
Unverifiable Information	67	46	49	40	96	104	90	93	81	101	767
Credit Application Incomplete	138	95	81	60	209	208	176	252	273	251	1,743
Mortgage Insurance Denied	16	14	9	4	9	9	1	8	2	1	73
Other	173	121	124	103	214	237	283	279	264	236	2,034
Missing	699	262	542	520	1,144	1,152	1,288	1,325	1,371	1,404	9,707
Total	**2390**	**1795**	**1890**	**1662**	**3616**	**3882**	**3748**	**3914**	**4020**	**4044**	**30961**

Denial rates were observed to differ by race and ethnicity, as shown in Table IV.62. While white applicants had a denial rate of 13.2 over the period from 2008 through 2017, black applicants had a denial rate of 21.8 percent. American Indian applicants also had a denial rate higher than the average, at 26.2 percent versus 14.8 percent for the whole Non-Entitlement Area. As for ethnicity, Hispanic applicants had a higher denial rate than non-Hispanic applicants, at 18.4 percent versus 14.1 percent.

Table IV.62
Denial Rates by Race/Ethnicity of Applicant
State of Alabama Non-Entitlement
2004–2017 HMDA Data

Race/Ethnicity	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Average
American Indian	31%	32.2%	27.9%	27.1%	31%	25.2%	25%	24.5%	30.4%	18.5%	26.2%
Asian	21.1%	24.6%	16.9%	20.3%	16%	17.6%	12.9%	16.7%	12%	12.1%	15.1%
Black	26.9%	24.3%	24.5%	22.3%	23%	23.7%	22.3%	22.3%	19.9%	17.3%	21.8%
Pacific Islander	4.2%	16.7%	0%	17.6%	24%	17.1%	10.7%	12.1%	19%	12.1%	14.7%
White	16.1%	16.2%	17.7%	16.2%	14.5%	14.2%	13.5%	12%	11%	10.4%	13.2%
Not Available	36.5%	27.3%	28.6%	24.2%	24.1%	25.5%	24%	26.7%	21.4%	19.9%	24.8%
Not Applicable	40%	100%	0%	50%	33.3%	20%	50%	0%	0%	25%	29.1%
Average	**18.5%**	**17.8%**	**19%**	**17.4%**	**16%**	**15.8%**	**14.9%**	**13.8%**	**12.6%**	**11.7%**	**14.8%**
Hispanic	25.2%	18.9%	20.8%	17.9%	18.4%	21.9%	17.8%	18.4%	16.8%	15.5%	18.4%
Non-Hispanic	17.1%	17.1%	18.2%	16.8%	15.4%	15.1%	14.4%	13.1%	12%	11.1%	14.1%

As shown in Table IV.63, the denial rate for prospective female homeowners was 16.5 percent, almost three percentage points higher than the denial rate for male applicants at 13.6 percent. Denial rates for male and female applicants differed considerably by year, but each year the rate of female denials were higher than that of males.

Table IV.63
Denial Rates by Gender of Applicant
State of Alabama Non-Entitlement
2008–2017 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2008	16.5%	20.5%	43.1%	42.9%	18.5%
2009	16%	20.9%	29.5%	100%	17.8%
2010	17.5%	21.5%	31.1%	0%	19%
2011	16%	19.8%	28.2%	50%	17.4%
2012	15%	17.4%	26.1%	33.3%	16%
2013	14.9%	16.9%	26%	20%	15.8%
2014	13.8%	17.1%	22.3%	50%	14.9%
2015	12.5%	15.8%	29.4%	0%	13.8%
2016	11.3%	14.7%	20.9%	12.5%	12.6%
2017	10.9%	12.5%	20.7%	5.3%	11.7%
Average	**13.6%**	**16.5%**	**25.9%**	**20%**	**14.8%**

Predatory Lending

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

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

Home loans are designated as "high-annual percentage rate" loans (HALs) where the annual percentage rate on the loan exceeds that of a comparable treasury instruments by at least three percentage points. As shown in Table I.V.64, some 4,312 loans between 2008 and 2017 were HALs, accounting for 2.4 percent. The highest rate of HAL loans was seen in 2008, at 12.2 percent, which fell to 0.9 percent in 2017.

Table IV.64
Originated Owner-Occupied Loans by HAL Status
State of Alabama Non-Entitlement
2008–2017 HMDA Data

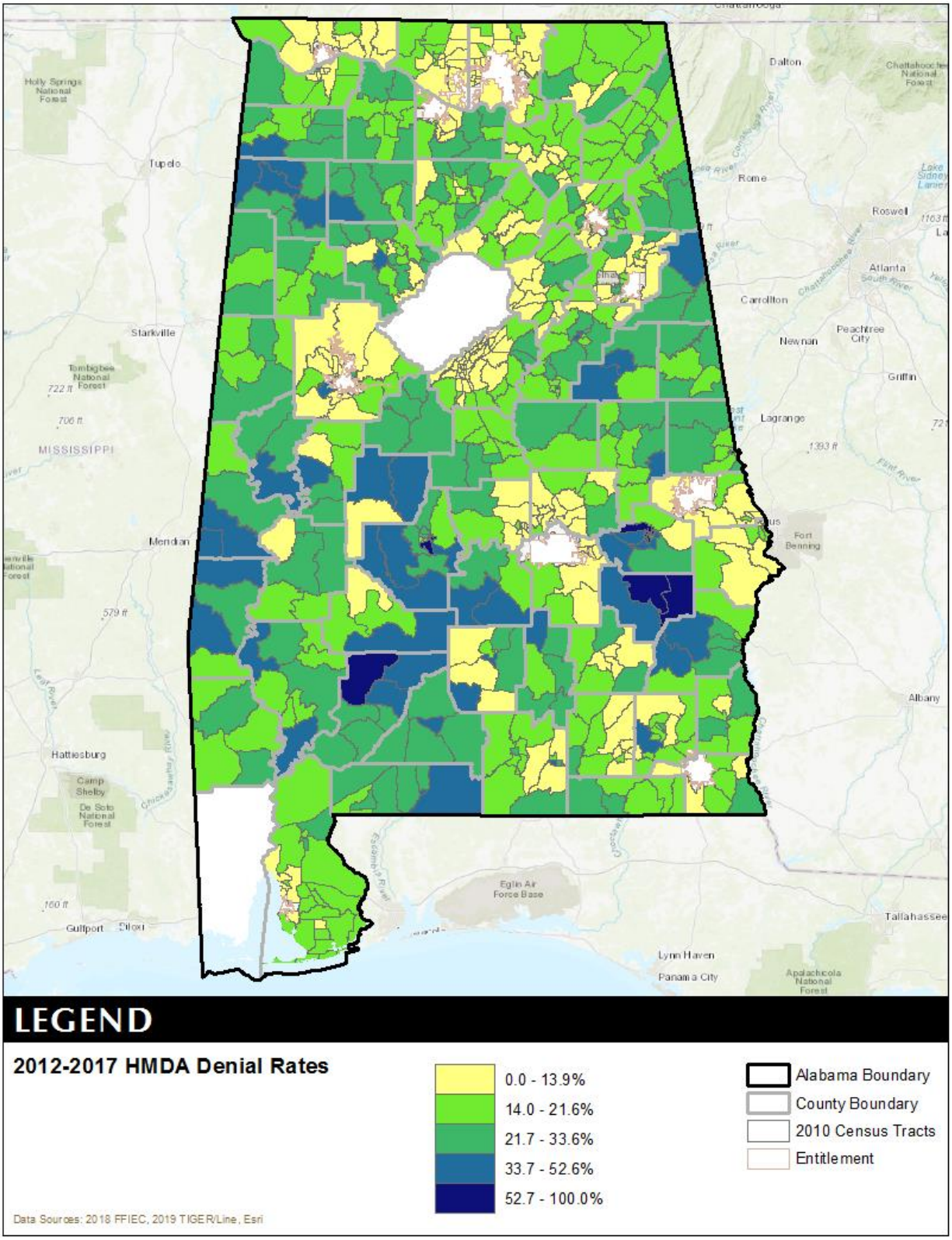
Loan Type	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
HAL	1289	711	162	209	387	358	309	319	285	283	4312
Other	9260	7590	7879	7697	18569	20347	21030	24066	27660	30148	174246
Total	**10,549**	**8,301**	**8,041**	**7,906**	**18,956**	**20,705**	**21,339**	**24,385**	**27,945**	**30,431**	**178,558**
Percent HAL	12.2%	8.6%	2%	2.6%	2%	1.7%	1.4%	1.3%	1%	0.9%	2.4%

Geographic Distribution of Mortgage Denials

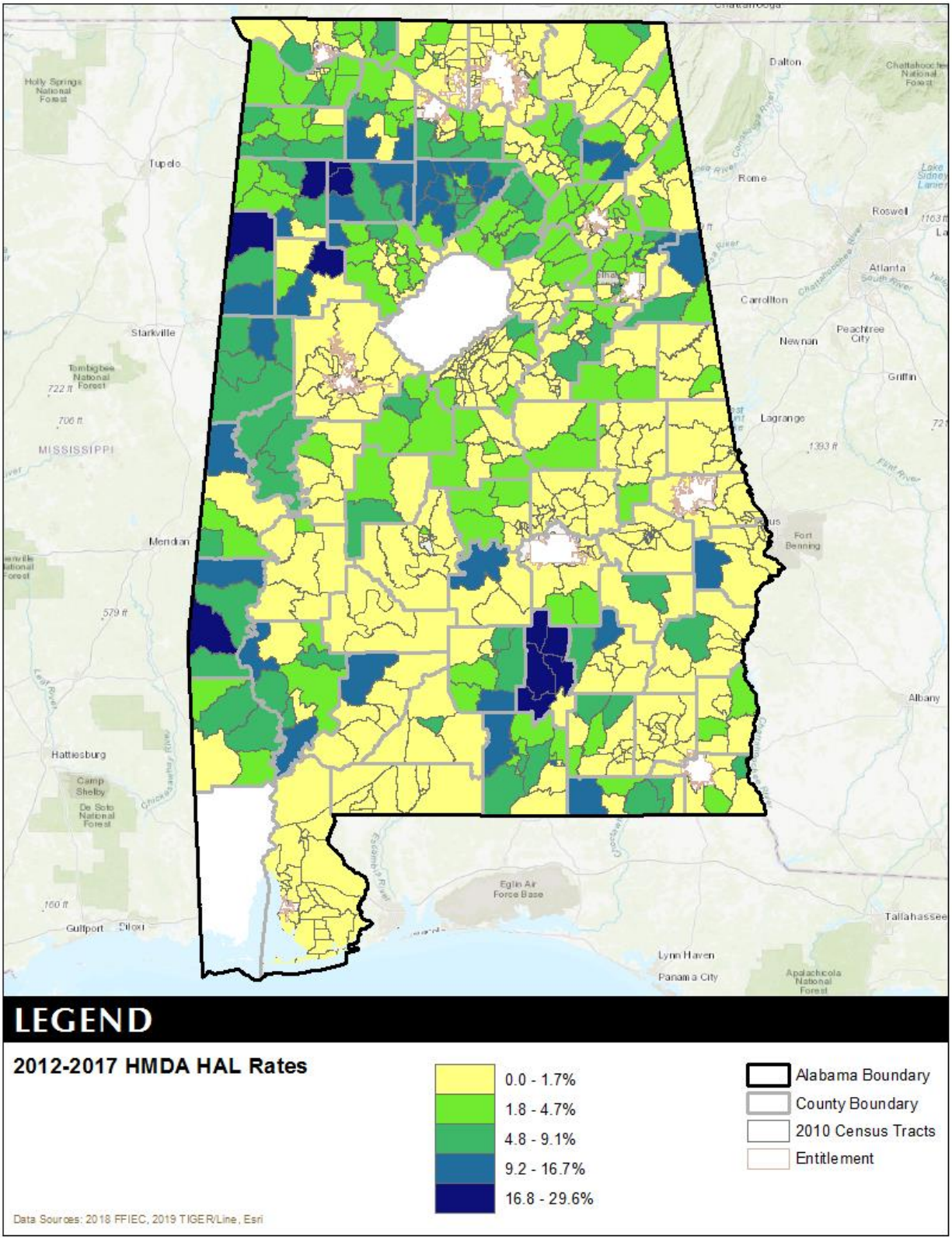
Map IV.15, on the following page, shows mortgage denial rates from 2012 through 2017. There are some areas in the Non-Entitlement Areas of the State where these denial rates are more heavily concentrated. These include some of the more rural areas and areas in the central part of the State.

Map IV.16 shows HAL rates for 2012 through 2017. While HAL rates were typically low during this time period, there was a higher rate of HALs in western part of the State, as well as some areas in the more rural parts of the State.

Map IV.15
HMDA Mortgage Denials
State of Alabama Non-Entitlement Areas
2012-2017 HMDA Data



Map IV.16
HMDA HAL Rates
State of Alabama Non-Entitlement Areas
2012-2017 HMDA Data



F. Publicly Supported Housing Analysis

There are a variety of types and locations of public housing units within the Non-Entitlement Areas of Alabama. According to HUD's AFFH data, there are 66,745 total publicly supported units in the State of Alabama Non-Entitlement Areas. Of these, some 17,208 are public housing units, 17,208 are Project Based Section 8, and 2,669 are other HUD Multifamily. There are 9,522 Housing Choice Vouchers.

Table IV.65
Residents with Disabilities by Subsidized Housing Type
Non-Entitlement Area
HUD AFFH Raw Database

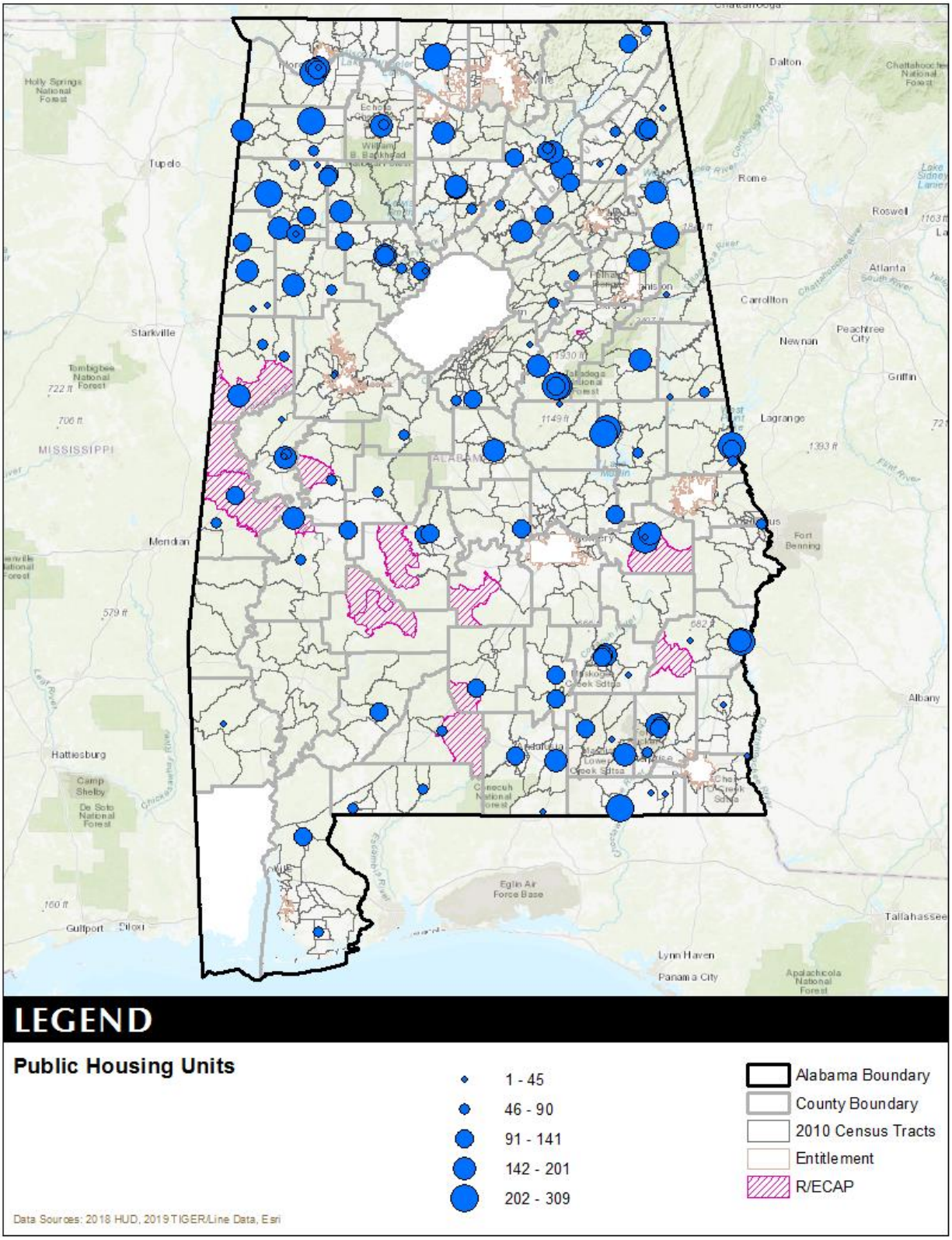
Program	Total Units	Total Disabled Units
Public Housing	37,346	6,698
Project Based Section 8	17,208	4,319
Other HUD Multifamily	2,669	498
Housing Choice Vouchers	9,522	1,492
Total	**66,745**	**13,007**

Map IV.17 shows public housing units in the State of Alabama Non-Entitlement Areas. Map IV.18 shows housing choice vouchers. Low Income Housing Tax Credit (LIHTC) units are shown in Map IV.19 and Map IV.20 shows other assisted multi-family housing units in the State. Public housing units are evenly distributed throughout the State. Housing Choice Vouchers, which are managed by local public housing authorities tend to have higher levels of concentrations in certain areas. This may be due to higher levels of need or lower costs of housing to utilize vouchers. LIHTC units, which are managed by the Alabama Housing Finance Authority, are found throughout the State. These units are serving households throughout the State in both urban and rural areas and reflects positively on the State's use of LIHTC to help offer affordable housing options throughout the State.

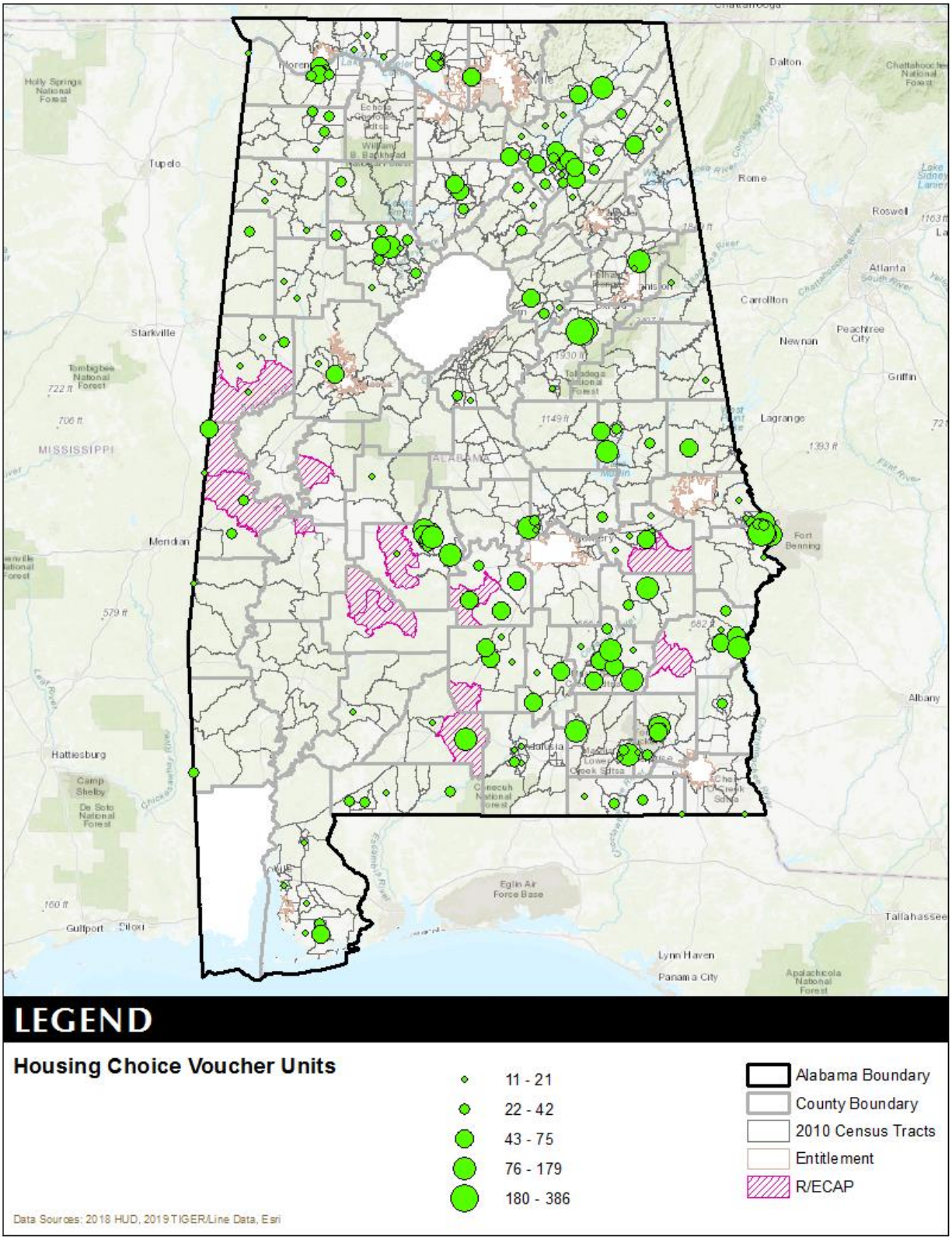
Disparities in Access to Opportunity

The locations of publicly supported housing units are in areas with both high and low access to opportunity. There does not appear to be a concentration of publicly supported housing units in the Non-Entitlement Areas of the State.

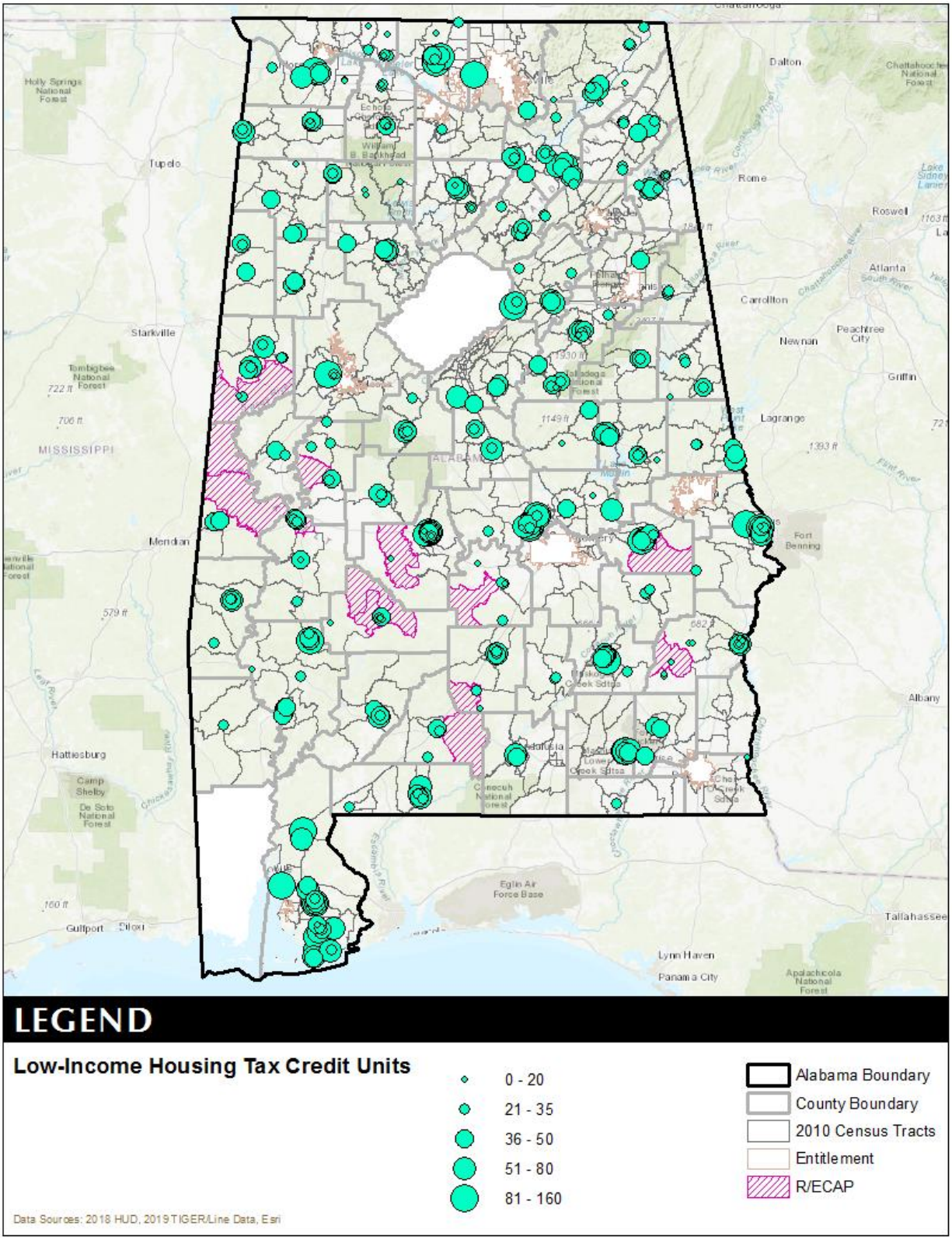
Map IV.17
Public Housing Units
State of Alabama Non-Entitlement Areas
2017 ACS, 2017 Tigerline, HUD AFFH Tool



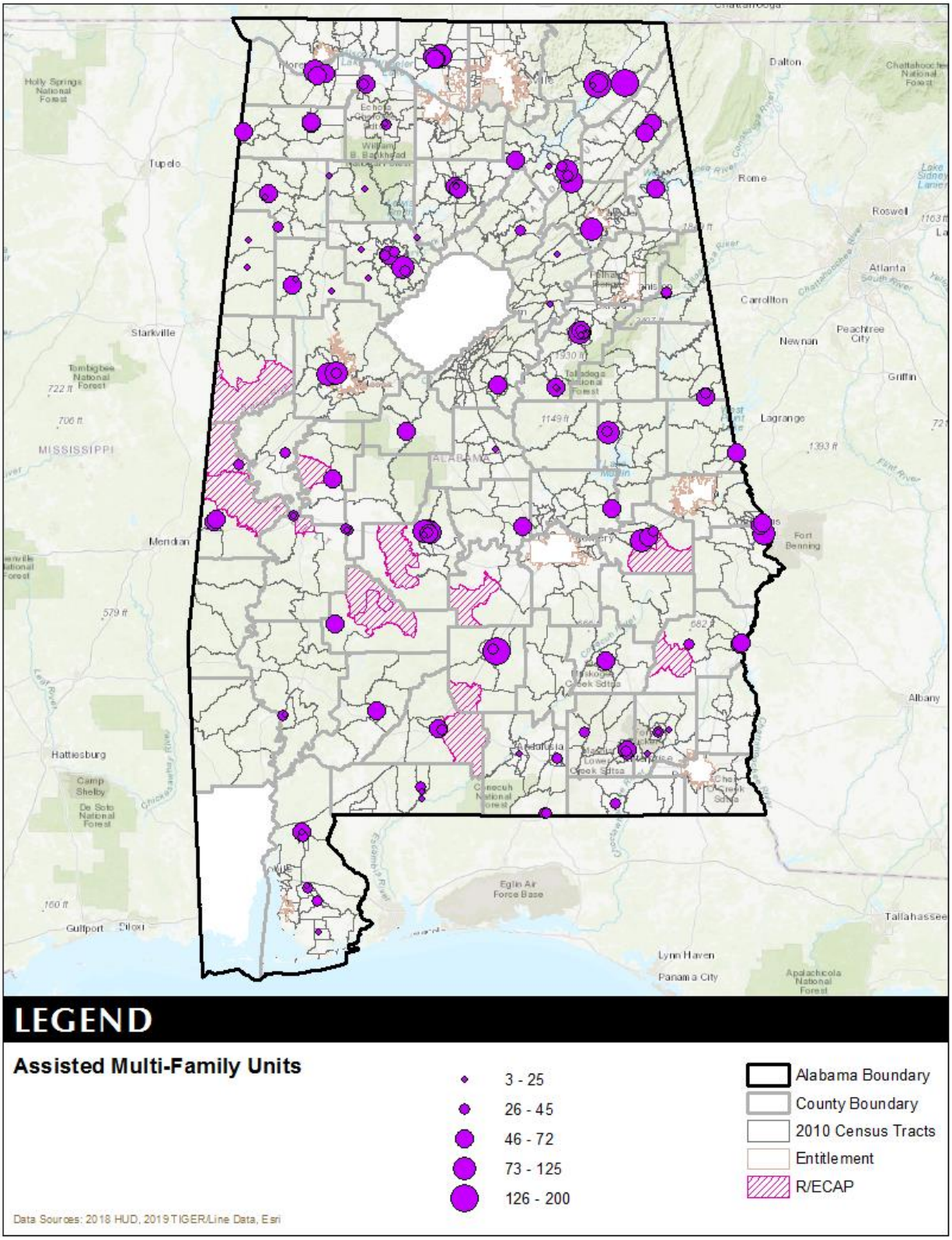
Map IV.18
Housing Choice Voucher Units
State of Alabama Non-Entitlement Areas
2017 ACS, 2017 Tigerline, HUD AFFH Tool



Map IV.19
Low Income Housing Tax Credit (LIHTC) Units
State of Alabama Non-Entitlement Areas
2017 ACS, 2017 Tigerline, HUD AFFH Tool



Map IV.20
Other HUD Multi-Family Units
State of Alabama Non-Entitlement Areas
2017 ACS, 2017 Tigerline, HUD AFFH Tool



G. Disability and Access Analysis

Section 503 of the Rehabilitation Act of 1973 prohibits discrimination based on disability in any program or activity receiving federal assistance.[12] Title II of the Americans with Disabilities Act of 1990 prohibits discrimination based on disability by public entities. HUD enforces the housing-related activities of public entities, including public housing, housing assistance, and housing referrals.[13]

Persons with Disabilities

Disability by age, as estimated by the 2017 ACS, is shown in Table IV.66, below. The disability rate for females was 17.2 percent, compared to 17 percent for males. The disability rate grew precipitously higher with age, with 55.8 percent of those over 75 experiencing a disability.

Table IV.66
Disability by Age
State of Alabama Non-Entitlement
2017 Five-Year ACS Data

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	585	0.7%	511	0.6%	1,096	0.6%
5 to 17	19,152	7.5%	11,447	4.7%	30,599	6.1%
18 to 34	26,550	8.9%	23,151	7.7%	49,701	8.3%
35 to 64	105,393	18.8%	110,776	18.4%	216,169	18.6%
65 to 74	48,243	35.9%	48,419	31.6%	96,662	33.6%
75 or Older	40,663	53.8%	62,080	57.2%	102,743	55.8%
Total	**240,586**	**17%**	**256,384**	**17.2%**	**496,970**	**17.1%**

The number of disabilities by type, as estimated by the 2017 ACS, is shown in Table IV.67. Some 10.5 percent have an ambulatory disability, 8.1 have an independent living disability, and 3.6 percent have a self-care disability.

Table IV.67
Total Disabilities Tallied: Aged 5 and Older
State of Alabama Non-Entitlement
2017 Five-Year ACS

Disability Type	Population with Disability	Percent with Disability
Hearing disability	134,681	4.6%
Vision disability	91,974	3.2%
Cognitive disability	184,131	6.7%
Ambulatory disability	287,026	10.5%
Self-Care disability	98,132	3.6%
Independent living disability	180,768	8.1%

[12] 29 U.S.C. §§794
[13] 42 U.S.C. §§ 12131 – 12165

Housing Accessibility

Accessible housing units are located throughout the State. However, many newer housing units are located outside city center areas. These newer housing units are more likely to have the mandatory minimum accessibility features.

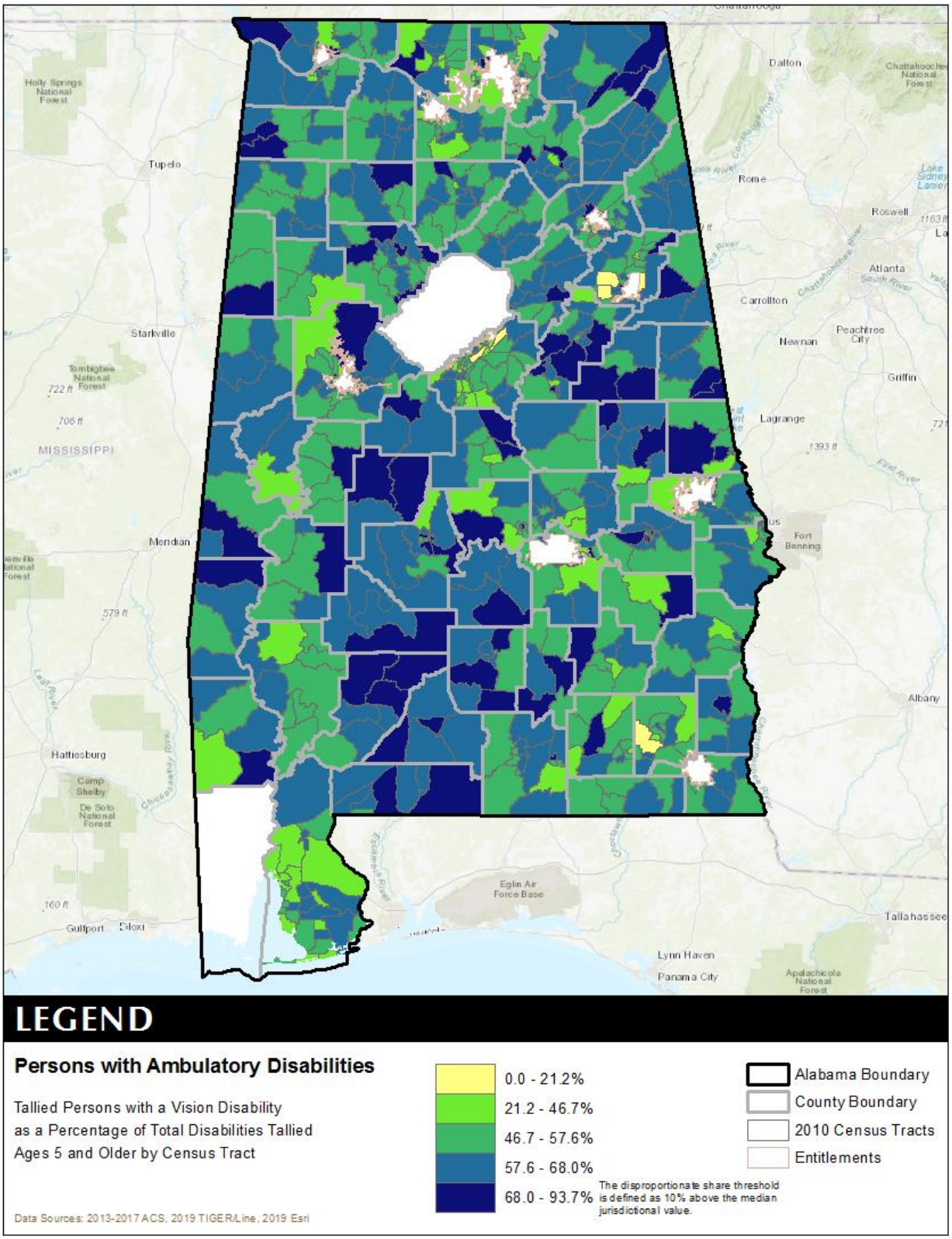
Some 19.5 percent of publicly supported housing units, according to HUD's AFFH database, are accessible. This exceeds the rate of disability for the general population in the Non-Entitlement Areas of the State. However, with the aging population, and the rate of disabilities for persons utilizing publicly supported housing, this may not meet the needs of current and future residents with disabilities.

Table IV.68
Residents with Disabilities by Subsidized Housing Type
State of Alabama Non-Entitlement
HUD AFFH Raw Database

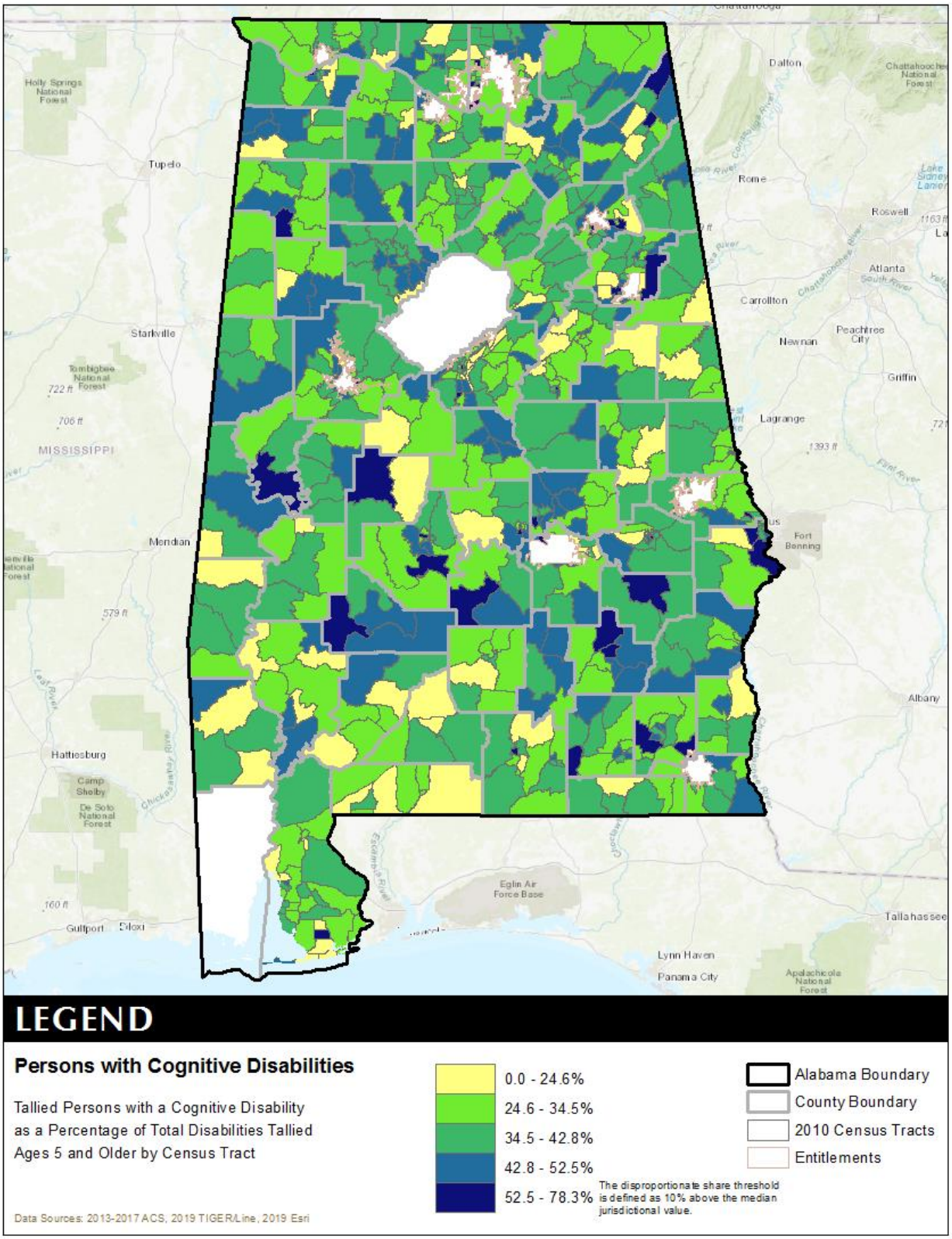
Program	Total Units	Total Disabled Units
Public Housing	37,346	6,698
Project Based Section 8	17,208	4,319
Other HUD Multifamily	2,669	498
Housing Choice Vouchers	9,522	1,492
Total	**66,745**	**13,007**

The Maps on the following pages show the distribution of households with various disabilities. There does not appear to be a concentration of households by disability type in any one area of the Non-Entitlement Areas of the State.

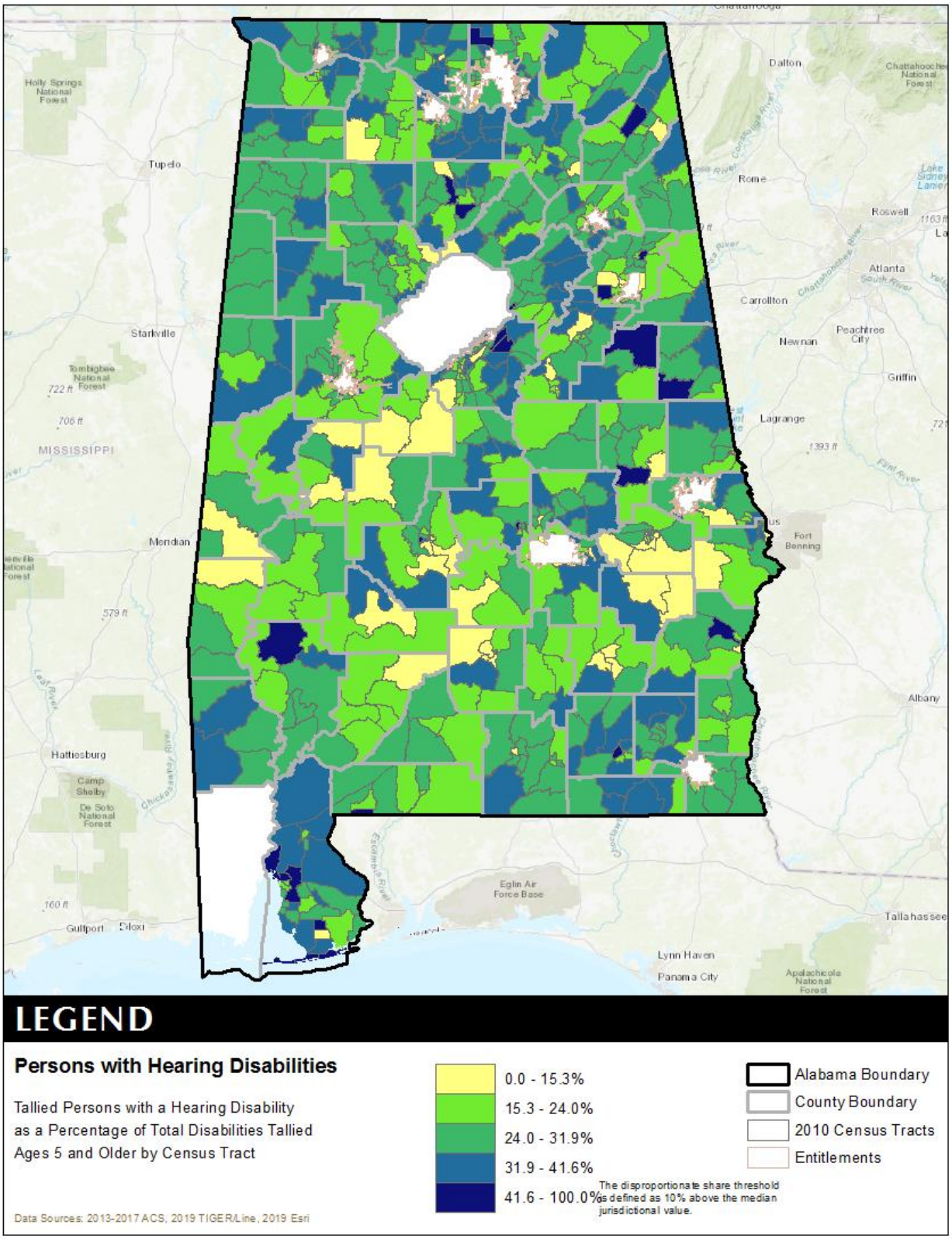
Map IV.21
Persons with Ambulatory Disabilities
State of Alabama Non-Entitlement Areas
2017 ACS, 2017 Tigerline, HUD AFFH Tool



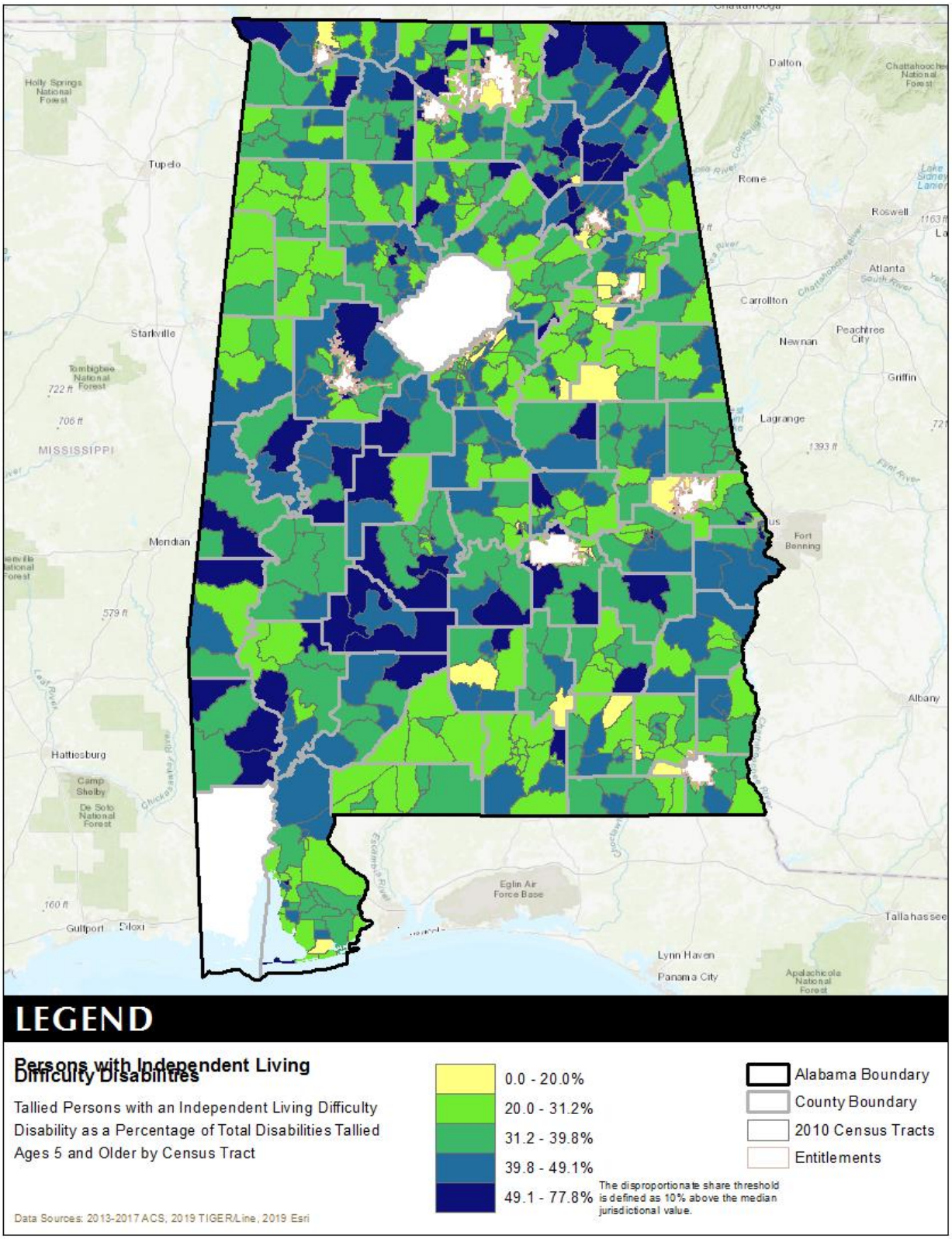
Map IV.22
Persons with Cognitive Disabilities
State of Alabama Non-Entitlement Areas
2017 ACS, 2017 Tigerline, HUD AFFH Tool



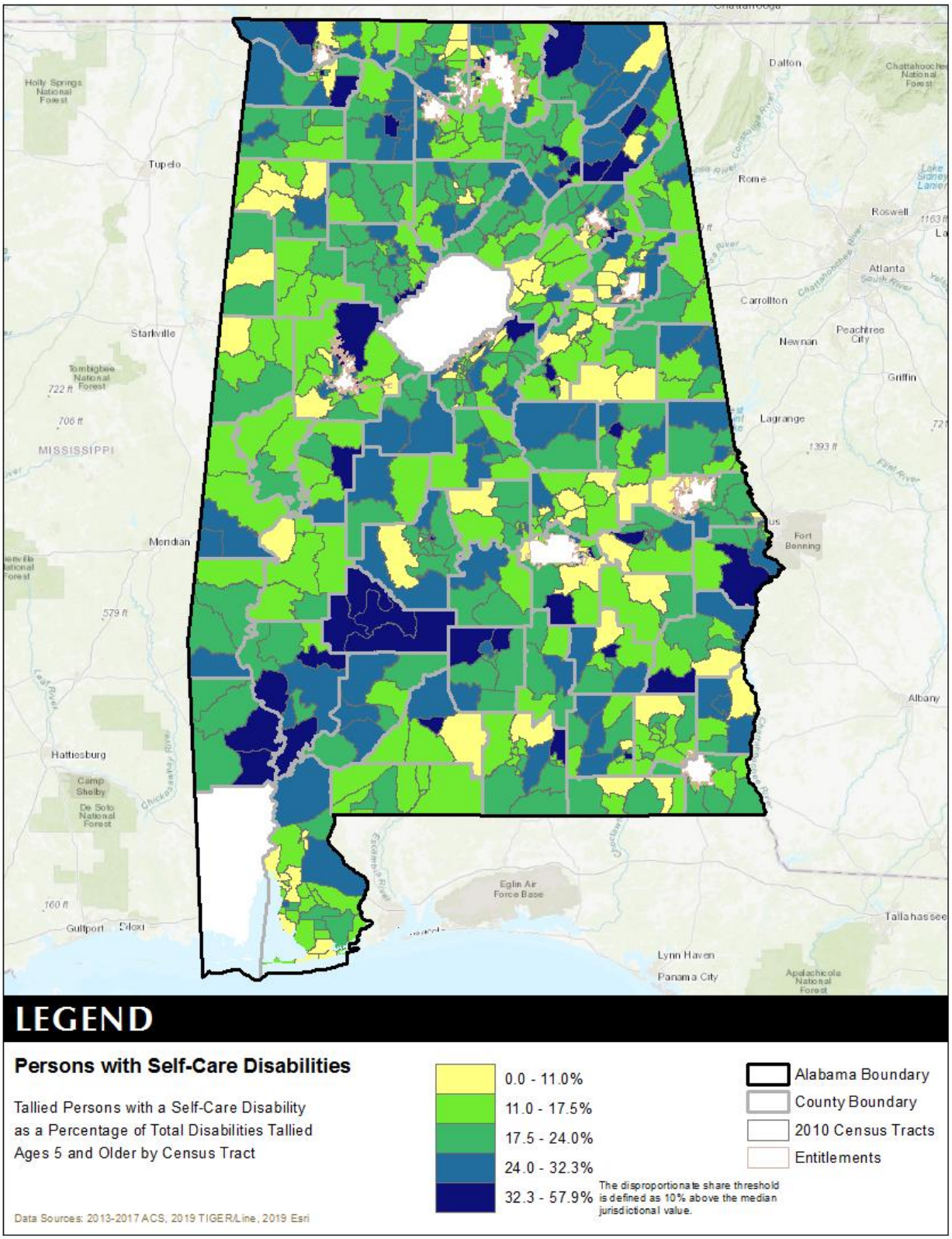
Map IV.23
Persons with Hearing Disabilities
State of Alabama Non-Entitlement Areas
2017 ACS, 2017 Tigerline, HUD AFFH Tool



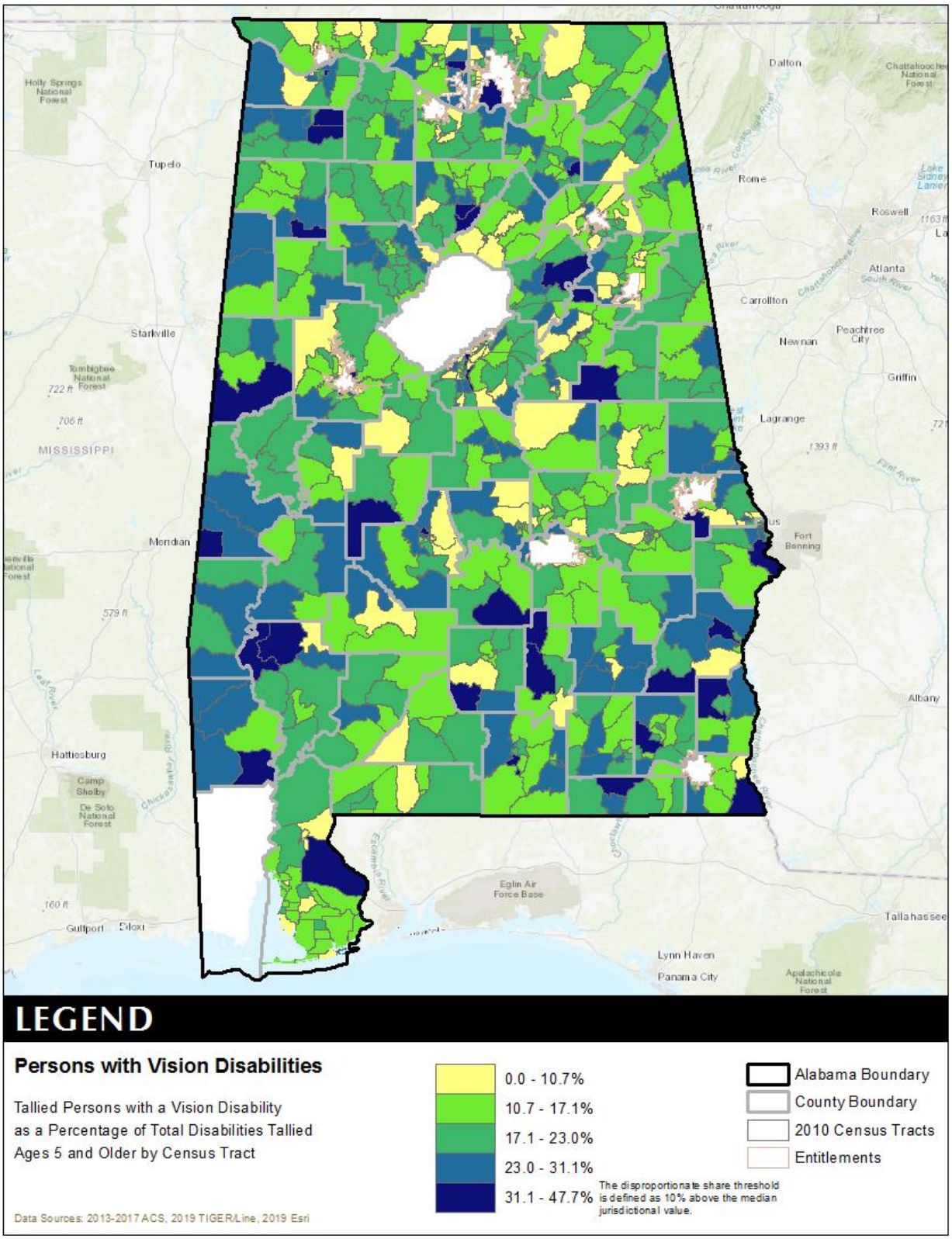
Map IV.24
Persons with Independent Living Disabilities
State of Alabama Non-Entitlement Areas
2017 ACS, 2017 Tigerline, HUD AFFH Tool



Map IV.25
Persons with Self Care Disabilities
State of Alabama Non-Entitlement Areas
2017 ACS, 2017 Tigerline, HUD AFFH Tool



Map IV.26
Persons with Vision Disabilities
State of Alabama Non-Entitlement Areas
2017 ACS, 2017 Tigerline, HUD AFFH Tool



H. Fair Housing Enforcement, Outreach Capacity, & Resources

Federal Fair Housing Laws

Federal laws provide the backbone for U.S. fair housing regulations. The following federal and state rules, regulations, and executive orders inform municipalities and developers of their fair housing obligations and the rights of protected classes. Many of these statutes were successful in generating specialized resources, such as data, to aid organizations, government entities, and individuals in affirmatively furthering fair housing. While some laws have been previously discussed in this report, a list of laws related to fair housing, as defined on the U.S. Department of Housing and Urban Development's (HUD's) website, is presented below:

Title VIII of the Civil Rights Act of 1968 (Fair Housing Act)[14]

The Fair Housing Act prohibits discrimination in the sale, rental, financing, and insuring of housing on the basis of race, color, religion, sex, and national origin. In 1988, the act was amended to include family status and disability as protected classes, which includes children under the age of 18 living with parents or legal custodians, pregnant women, and persons securing custody of children under the age of 18. Jurisdictions may add protected classes but are not allowed to subtract from the seven federally protected classes.[15] The Act also contains design and construction accessibility provisions for certain new multi-family dwellings developed for first occupancy on or after March 13, 1991.[16] On April 30, 2013, HUD and the Department of Justice released a Joint Statement that provides guidance regarding the persons, entities, and types of housing and related facilities that are subject to the accessible design and construction requirements of the Act.

It is unlawful under the Act to discriminate against a person in a protected class by: Refusing to sell or rent after the making of a bona fide offer, or to refuse to negotiate for the sale or rental of, or otherwise make unavailable or deny, a dwelling to any person because of race, color, religion, sex, familial status, or national origin; discriminating against any person in the terms, conditions, or privileges of sale or rental of a dwelling, or in the provision of services or facilities based on a protected class; representing that a dwelling is not available for inspection, sale, or rental when it is, in fact, available; publishing an advertisement indicating any preference, limitation, or discrimination against a protected class; or refusing to allow a person with a disability to make a reasonable modification to the unit at the renter's own expense.

There are several exceptions to the law. It is legal for developments or buildings for the elderly to exclude families with children. In addition, single-family homes being sold by the owner of an owner-occupied 2 family home may be exempt, unless a real estate agency is involved, if they have advertised in a discriminatory way, or if they have made discriminatory statements. There are no exemptions for race discrimination because race is covered by other civil rights laws.

The following are examples of Fair Housing Act violations:

1. Making any representation, directly or implicitly, that the presence of anyone in a protected class in a neighborhood or apartment complex may or will have the effect of lowering

[14] 42 U.S.C. 3601, et. Seq., as amended in 1988
[15] "HUD Fair Housing Laws and Presidential Executive Orders." http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/FHLaws
[16] "Title VIII: Fair Housing and Equal Opportunity." http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/progdesc/title8

property taxes, reduce safety, make the neighborhood and/or schools worse, change the character of the neighborhood, or change the ability to sell a home.

2. Providing inconsistent, lesser, or unequal service to customers or clients who are members of a protected class, such as failing to return calls from a buyer agent to avoid presenting a contract to your seller, avoiding or delaying an appointment for a showing a listing, making keys unavailable, failing to keep appointments, or refusing maintenance or repairs to an apartment.

3. Requiring higher standards for a member of a protected class, including asking for more references or demanding a higher credit rating.

4. Requiring employers to make distinctions on applications, or in the application process, among protected class members, including marking applications to indicate race, sex, etc. of applicant or misrepresenting availability for particular protected classes.

5. Advertising in a manner that indicates a preference for a particular class and thereby excluding protected class members.

Title VI of the Civil Rights Act of 1964

Title VI prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance, including denying assistance, offering unequal aid, benefits, or services, aiding or perpetuating discrimination by funding agencies that discriminate, denying planning or advisory board participation, using discriminatory selection or screening criteria, or perpetuating the discrimination of another recipient based on race, color, or national origin.

Section 504 of the Rehabilitation Act of 1973

The Act prohibits discrimination based on disability in any program or activity receiving federal financial assistance. The concept of "reasonable accommodations" and "reasonable modifications" was clarified in memos dated May 17, 2004 and March 5, 2008. Reasonable accommodations are changes in rules, policies, practices, or services so that a person with a disability can participate as fully in housing activities as someone without a disability. Reasonable modifications are structural changes made to existing premises, occupied or to be occupied by a person with a disability so they can fully enjoy the premises.

Section 109 of the Housing and Community Development Act of 1974

Section 109 prohibits discrimination on the basis of race, color, national origin, sex or religion in programs or activities funded from HUD's Community Development Block Grant Program.

Title II of the Americans with Disabilities Act of 1990

Title II applies to state and local government entities and protects people with disabilities from discrimination on the basis of disability in services, programs, and activities. HUD enforces Title II when it relates to state and local public housing, housing assistance and housing referrals.

Architectural Barriers Act of 1968

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

specifies accessibility standards for ramps, parking, doors, elevators, restrooms, assistive listening systems, fire alarms, signs, and other accessible building elements and are enforced through the Department of Defense, HUD, the General Services Administration, and the U.S. Postal Services.

Age Discrimination Act of 1975

The Age Discrimination Act prohibits discrimination on the basis of age in programs or activities receiving federal financial assistance, applies to all ages, and may be enforced by the head of any Federal department or agency by terminating grant funding for those with an express finding on the record who fail to comply with the Act after reasonable notice. HUD established regulations for implementation of the Age Discrimination Act for HUD programs.

Title IX of the Education Amendments Act of 1972

Title IX prohibits discrimination on the basis of sex or blindness in education programs or activities that receive federal financial assistance.[17]

The Home Mortgage Disclosure Act (HMDA)

HMDA requires both depository and non-depository lenders to collect and publicly disclose information about housing-related applications and loans, including the race, ethnicity, sex, loan amount, and income of mortgage applicants and borrowers by Census tract. Depository institutions that meet the following criteria are required to report:

- Bank, credit union, or savings association
- Total assets must exceed the coverage threshold[18]
- The institution must have had a home or branch office in a Metropolitan Statistical Area (MSA)
- The institution must have originated or refinanced at least one home purchase loan secured by a first lien on a one- to four-family dwelling
- The institution must be federally insured or regulated
- The mortgage loan must have been insured, guaranteed, or supplemented by a federal agency or intended for sale to Fannie Mae or Freddie Mac

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

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

In addition to reporting race and ethnicity data for loan applicants, the HMDA reporting requirements were modified in response to the Predatory Lending Consumer Protection Act of 2002

[17] "HUD Fair Housing Laws and Presidential Executive Orders."
[18] Each December, the Federal Reserve announces the threshold for the following year. The asset threshold may change from year to year based on changes in the Consumer price Index for Urban Wage Earners and Clerical Workers.

as well as the Home Owner Equity Protection Act (HOEPA). Consequently, loan originations are now flagged in the data system for three additional attributes:

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

EXECUTIVE ORDERS

Executive Order 11063 Equal Opportunity in Housing

Signed by President Kennedy on November 20, 1962, the Order prohibits discrimination based on race, color, religion, creed, sex, or national origin in the sale, leasing, rental, or other disposition of properties and facilities owned, operated, or funded by the federal government. The Order also prohibits discrimination in lending practices that involve loans insured or guaranteed by federal government.

Executive Order 12892 Leadership and Coordination of Fair Housing in Federal Programs: Affirmatively Furthering Fair Housing

Signed by President Clinton on January 11, 1994, the Order required federal agencies to affirmatively further fair housing in the programs and activities with the Secretary of HUD coordinating the effort, and established the President's Fair Housing Council, which is chaired by the Secretary of HUD.

Executive Order 12898 Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations

Signed by President Clinton on February 11, 1994, the order requires federal agencies to practice environmental justice in its programs, policies, and activities. Specifically, developers and municipalities using federal funds must evaluate whether or not a project is located in a neighborhood with a concentration of minority and low-income residents or a neighborhood with disproportionate adverse environmental effects on minority and low-income populations. If those conditions are met, viable mitigation measures or alternative project sites must be considered.

Executive Order 13166 Improving Access to Services for Persons with Limited English Proficiency

Signed by President Clinton on August 11, 2000, the Order eliminates limited English proficiency as a barrier to full and meaningful participation in federal programs by requiring federal agencies to examine the services they provide, identify the need for LEP services, then develop and implement a system to provide those services. The Department of Justice issued policy guidance which set forth compliance standards to ensure accessibility to LEP persons.

Executive Order 13217 Community Based Alternatives for Individuals with Disabilities

Signed by President Bush on June 18, 2001, the Order requires federal agencies to evaluate their policies and programs to determine if they need to be revised to improve the availability of community-based living arrangements for persons with disability, noting that isolating or

segregating people with disabilities in institutions is a form of disability-based discrimination prohibited by Title II of the ADA.

STATE FAIR HOUSING LAWS AND RESOURCES

State and local governments may also enact fair housing and anti-discrimination laws, which may extend protections against discrimination to groups who are not included in the federal Fair Housing Act. Title 24 at Chapter 8 of Alabama's State Code, also known as the "Alabama Fair Housing Law", enshrines protection from housing discrimination in state law; however, the law does not extend additional protections to groups that are not protected by the federal FHA.[19]

STATE AGENCIES

The Alabama Department of Economic and Community Affairs (ADECA) is charged by Alabama State Code (§24-8-9 *et seq*) with administering the provisions of the Alabama Fair Housing Law. The text of this law is included in Appendix F, and the complaint process provided for in the law is outlined on pages 62 and 63 below. As part of its powers and duties, ADECA is asked to accept fair housing complaints from Alabama residents, investigate those complaints, attempt to broker conciliation agreements between complainants and respondents, designate panels to hear complaints, and oversee the compliance with orders issued by such panels. In addition, ADECA may initiate studies, publish reports, and "promulgate regulations necessary for the enforcement of [the Alabama Fair Housing Law]", as long as such regulations do not exceed the requirements of the federal Fair Housing Act.[20] ADECA may be contacted through the following information:

Alabama Department of Economic and Community Affairs
P.O. Box 5690
Montgomery, Alabama 36103
Telephone: (334) 242-5100
FAX: (334) 242-5099
Email: contact@adeca.alabama.gov

NON-PROFIT ORGANIZATIONS

There are two current FHIP grantees serving residents of southern and central Alabama: Mobile-based Center for Fair Housing and the Montgomery-based Central Alabama Fair Housing Center. In addition, the Fair Housing Center of Northern Alabama serves residents of northern Alabama.

The Center for Fair Housing

The Center for Fair Housing (CFH) serves residents of eight counties in southern Alabama: Mobile, Baldwin, Monroe, Conecuh, Clarke, Choctaw, Washington, and Escambia Counties. The CFH offers a range of housing services, pertaining to housing counseling, financial literacy, outreach and education, accessibility, enforcement, and legal services.

[19] Ala. Code §24-8-1, et seq.
[20] It should be noted that, in spite of the fact that ADECA is vested with the authority and responsibility to receive fair housing complaints and enforce the state's Fair Housing Law, the resources available to the agency to enforce the law are limited, particularly in light of ADECA's responsibility to conduct the economic and community development activities that represent the core of its mission.

Center for Fair Housing
602 Bel Air Boulevard, Suite 7
Mobile, Alabama 36606
Telephone: (251) 479-1532
FAX: (251) 479-1488
Email: info@sacfh.org

The Central Alabama Fair Housing Center

The Central Alabama Fair Housing Center (CAFHC) serves residents of twenty-nine counties in Central Alabama: Autauga, Barbour, Bullock, Butler, Chambers, Chilton, Coffee, Coosa, Covington, Crenshaw, Dale, Dallas, Elmore, Geneva, Greene, Hale, Henry, Houston, Lee, Lowndes, Macon, Marengo, Montgomery, Perry, Pike, Russell, Sumter, Tallapoosa, and Wilcox Counties. The mission of the CAFHC is to "promote understanding of and to help insure compliance with the federal Fair Housing Act." In service of this mission, the CAFHC conducts outreach and educational activities related to fair housing; investigates complaints filed by residents of central Alabama; files administrative or court actions; and mediates fair housing disputes between complainants and housing providers.

Central Alabama Fair Housing Center
2867 Zelda Road
Montgomery, Alabama 36106
Telephone: (334) 263-4663
FAX: (334) 263-4664

Fair Housing Center of Northern Alabama

The Fair Housing Center of Northern Alabama (FHCNA) serves residents of Northern Alabama who feel that they have been subjected to illegal discrimination in the state's housing market. The FHCNA conducts fair housing tests and promoted fair housing policy through the provision of education, outreach, enforcement, and investigative services. The FHCNA may be contacted through the following information:

Fair Housing Center of Northern Alabama
1728 Third Avenue North, Suite 400C
Birmingham, Alabama 35203
Telephone: (205) 324-0111
FAX: (205) 320-0238

Fair Housing Complaints

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

Fair Housing and Equal Opportunity (FHEO) begins its complaint investigation process shortly after receiving a complaint. A complaint must be filed within one year of the last date of the alleged

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

Requests for Fair Housing Complaint Data were sent to the Department of Housing and Urban Development (HUD), the Center for Fair Housing, Central Alabama Fair Housing Center, and the Fair Housing Center of Northern Alabama in September, 2019. These requests were followed up with additional requests in December, 2019 and January, 2020. At the date of this document, no complaint data has been received from any of these entities. In light of the lack of availability of new data, data from 2004-2014 is included in the narrative below.

As shown in Table IV.69, below, race was the perceived basis for discrimination in just over 50 percent of complaints lodged with HUD from 2004 through 2014. The next most common was disability, which was cited in over 45 percent of complaints. Note that complainants may cite more than one basis in complaints filed with HUD; indeed, 524 bases were cited in the 363 complaints HUD received.

Table IV.69
Fair Housing Complaints by Basis
Non-Entitlement Areas of Alabama
2004–2014 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	Total
Race	20	13	19	16	35	23	30	12	3	7	5	183
Disability	15	8	13	18	24	24	23	16	8	13	3	165
Family Status	9	4	4	5	10	13	5	1	2	5		58
Sex	5	3	5	6	9	6	14		2	4	3	57
Retaliation	3	1	3	1	2	3	1	5	2	8	1	30
National Origin		1				5	4	2	2	2	1	17
Religion	3	1					1	1	1	1		8
Color					1	2	1		1		1	6
Total Bases	**55**	**31**	**44**	**46**	**81**	**76**	**79**	**37**	**21**	**40**	**14**	**524**
Total Complaints	**34**	**20**	**28**	**31**	**52**	**57**	**57**	**33**	**15**	**26**	**10**	**363**

In addition to the basis for discrimination, HUD records the issue, or alleged discriminatory action related to each complaint. These are presented in Table IV.70. In the same way that bases are reported, more than one issue may be associated with each complaint. Discrimination in terms, conditions, or privileges relating to rental was by far the most common type of discriminatory behavior alleged, cited in 169 complaints. The next most common complaint related to discriminatory acts under Section 818 of the FHA, which concerns coercive or retaliatory measures taken against those who attempt to exercise their fair housing rights. Not surprisingly, given the number of complaints that alleged discrimination on the basis of disability, failure to make reasonable accommodation was a relatively common issue, cited in 79 complaints.

Table IV.70
Fair Housing Complaints by Issue
Non-Entitlement Areas of Alabama
2004–2014 HUD Data

Issue	Total
Discrimination in term, conditions or privileges relating to rental	169
Discriminatory acts under Section 818 (coercion, etc.)	91
Failure to make reasonable accommodation	79
Discriminatory terms, conditions, privileges, or services and facilities	70
Discriminatory refusal to rent	52
Discriminatory advertising, statements and notices	31
Otherwise deny or make housing available	29
False denial or representation of availability - rental	22
Discriminatory financing (includes real estate transactions)	14
Discrimination in services and facilities relating to rental	11
Failure to permit reasonable modification	11
Discriminatory refusal to rent and negotiate for rental	7
Discrimination in terms, conditions, privileges relating to sale	7
Steering	7
Discriminatory refusal to sell	6
Discrimination in the terms or conditions for making loans	6
Discrimination in making of loans	5
Discriminatory advertisement - rental	4
Refusing to provide municipal services or property	3
Failure to provide accessible and usable public and common user areas	3
False denial or representation of availability - sale	2
Other discriminatory acts	2
Using ordinances to discriminate in zoning and land use	2
Discriminatory refusal to negotiate for sale	1
Discriminatory refusal to negotiate for rental	1
Discriminatory advertising - sale	1
False denial or representation of availability	1
Discrimination in the appraising of residential real property	1
Discriminatory brokerage service	1
Restriction of choices relative to a sale	1
Non-compliance with design and construction requirements (handicap)	1
Failure to provide an accessible building entrance	1
Total Issues	**642**
Total Complaints	**363**

Around 30 percent of complaints lodged with the HUD were determined to have no cause, meaning that the HUD investigation did not produce sufficient evidence that discrimination had occurred or was about to occur to file a lawsuit against the accused party. Approximately 21 percent of these complaints, or 77, were withdrawn after resolution of the complaints and 67 were conciliated or settled, as shown in Table IV.71 on the following page.

Table IV.71
Fair Housing Complaints by Closure Status
Non-Entitlement Areas of Alabama
2004–2014 HUD Data

Closure Status	Total
No Cause	110
Withdrawal After Resolution	77
Conciliated / Settled	67
Withdrawal Without Resolution	37
Complainant Failed to Cooperate	33
Lack of Jurisdiction	18
Open	9
Unable to Locate Respondent	5
Election Made to Go to Court	4
FHAP Judicial Consent Order	1
DOJ Dismissal	1
Unable to Identify Respondent	1
Total Complaints	**363**

Table IV.72, below, presents the bases cited for the complaints considered to have cause: for the purposes of this study, such complaint includes those that were withdrawn after resolution, conciliated, or settled. Race and disability were again the most common complaint bases cited in these complaints; however, disability was the most common basis in those considered to have cause, cited in 78 complaints, followed by race, cited in 54 complaints.

Table IV.72
Fair Housing Complaints Found With Cause by Basis
Non-Entitlement Areas of Alabama
2004–2014 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	Total
Disability	7	1	6	7	13	12	10	12	6	2	2	78
Race	7	6	8	4	9	2	11	6		1		54
Family Status	5	2		1	2	8	2			4		24
Sex	3	3	1	2	4	1	5		1	1		21
Retaliation	1	1			1	1		5	1	1	1	12
National Origin						1	2	2	2			7
Color						1						1
Total Bases	**23**	**13**	**15**	**14**	**29**	**26**	**30**	**25**	**10**	**9**	**3**	**197**
Total Complaints	**15**	**6**	**10**	**11**	**18**	**20**	**21**	**23**	**9**	**7**	**2**	**142**

Discrimination in terms, conditions, or privileges relating to rental was again the most common discriminatory action cited in complaints that were considered to have cause, as shown in Table IV.73, on the following page. This issue was cited in 60 of the 142 complaints considered to have cause, or around 42 percent. Failure to make reasonable accommodation was the second most frequent, alleged in 43 complaints.

Table IV.73
Fair Housing Complaints Found With Cause by Issue
Non-Entitlement Areas of Alabama
2004–2014 HUD Data

Issue	Total
Discrimination in term, conditions or privileges relating to rental	60
Failure to make reasonable accommodation	43
Discriminatory acts under Section 818 (coercion, etc.)	29
Discriminatory terms, conditions, privileges, or services and facilities	25
Discriminatory refusal to rent	14
False denial or representation of availability – rental	9
Discriminatory advertising, statements and notices	7
Discriminatory financing (includes real estate transactions)	7
Otherwise deny or make housing available	5
Discriminatory refusal to rent and negotiate for rental	3
Discrimination in making of loans	3
Discrimination in terms, conditions, privileges relating to sale	3
Failure to permit reasonable modification	3
Discriminatory advertisement – rental	2
Discrimination in the terms or conditions for making loans	2
Discrimination in services and facilities relating to rental	2
Discriminatory refusal to sell	1
Steering	1
Refusing to provide municipal services or property	1
Using ordinances to discriminate in zoning and land use	1
Failure to provide an accessible building entrance	1
Failure to provide accessible and usable public and common user areas	1
Total Issues	**223**
Total Complaints	**142**

I. Fair Housing Survey Results

The Fair Housing survey has a total of 115 responses. Some 81 respondents represented Entitlement Areas in the State, while 34 represented Non-Entitlement Areas. Responses by Entitlement and Non-Entitlement Areas are available in the Appendix.

Table IV.74
Which areas of Alabama do you wish to address in this survey?
State of Alabama
Fair Housing Survey

Area	Total
State of Alabama Entitlement Area	81
State of Alabama Non-Entitlement Area	34
Other	0

Respondents were most likely to be in the banking or finance industry or a service provider.

Table IV.74
What are your primary roles in the housing industry?
State of Alabama
Fair Housing Survey

Role	Total
Advocate	17
Appraisal	0
Banking/Finance	21
Construction/Development	5
Insurance	0
Law/Legal Services	1
Local Government	16
Property Manager	9
Real Estate	2
Service Provider	21
Professional Services	5
Other	17
Missing	1
Total	**115**

The majority of respondents, or 57 out of 115, were homeowners. Some 21 were considered renters or tenants.

Table IV.75
Are you a:
State of Alabama
Fair Housing Survey

Response	Total
Homeowner	57
Renter/Tenant	21
Other	37
Missing	0
Total	**115**

When asked how familiar they are with fair housing laws, most respondents indicated they were at least somewhat familiar, accounting to 80 respondents in the survey.

Table IV.76
How familiar are you with fair housing laws?
State of Alabama
Fair Housing Survey

Response	Total
Not Familiar	5
Somewhat Familiar	40
Very Familiar	40
Missing	30
Total	**115**

Most respondents also believed that fair housing laws are useful, accounting for 84 total responses. Some 34 respondents, or 29.6 percent, felt that fair housing laws are difficult to understand, while 41 respondents did not. Results were mixed when asked if fair housing laws are adequately enforced in the State of Alabama, and some 37 respondents felt that there should be additional groups protected under fair housing law. Less than half of respondents were aware of any educational activities or training opportunities, and only 19 were aware of fair housing testing in their community. Some 43 respondents have participated in fair housing activities or training.

Table IV.77
Federal and State Fair Housing Laws
State of Alabama
Fair Housing Survey

Question	Yes	No	Don't Know	Missing	Total
Do you think fair housing laws serve a useful purpose?	84	0	1	30	115
Do you think fair housing laws are difficult to understand or follow?	34	41	9	31	115
Do you feel that fair housing laws are adequately enforced in the State of Alabama?	26	27	33	29	115
Based on your knowledge of fair housing law, do you think that additional groups should be protected under the State fair housing law?	37	24	24	30	115
Outreach and education activities, such as training and seminars, are used to help people better understand their rights and obligations under fair housing law. Are you aware of any educational activities or training opportunities available to you to learn about fair housing laws?	48	25	5	37	115
If you answered "yes" to the previous question, have you participated in fair housing activities or training?	42	17	1	55	115
Fair housing testing is often used to assess potential violations of fair housing law. Testing can include activities such as evaluating building practices to determine compliance with accessibility laws or testing if some people are treated differently when inquiring about available rental units. Are you aware of any fair housing testing of any sort in the State?	19	37	21	38	115

When asked to assess the level of fair housing outreach and educations activities in the State, most respondents that answered the question said there was too little. A similar response was seen for the current level of fair housing testing in the State.

Table IV.78
Fair Housing Barriers
State of **Alabama**
Fair Housing Survey

Question	Too Much	The Right Amount	Too Little	Don't Know	Missing	Total
Please assess the level of fair housing outreach and education activity in the State.	0	17	42	19	37	115
Please assess the current level of fair housing testing in the State.	4	8	16	49	38	115

Respondents were most likely to be aware of impediments to fair housing choice in the private sector in the home appraisal industry, followed by the mortgage and home lending industry. However, the majority of respondents were not aware of impediments in any of these areas.

Table IV.79
Fair Housing Testing and Activities
State of Alabama
Fair Housing Survey

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any impediments to Fair Housing Choice in these areas of the State?					
The home appraisal industry? Example: Basing home values on the ethnic composition of neighborhoods.	20	31	22	42	115
The mortgage and home lending industry? Example: Offering higher interest rates to women or racial minorities.	19	35	20	41	115
The home insurance industry? Example: Limiting policies and coverage for racial minorities.	15	35	23	42	115
The real estate industry? Example: Only showing properties to families with children in certain areas.	11	42	20	42	115
The real estate industry? Example: Only showing properties to families with children in certain areas.	11	37	19	48	115
Any other housing services?	9	28	22	56	115
The housing construction or housing design fields? Example: New rental complexes built with narrow doorways that do not allow wheelchair accessibility.	7	37	30	41	115

When asked about barriers in the public sector, respondents were most likely to be aware of barriers that limit access to government services, such as a lack of transportation, employment, or social services. This was followed by zoning laws and property assessment and tax policies.

Table IV.80
Fair Housing Barriers
State of **Alabama**
Fair Housing Survey

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any "impediments to fair housing choice" in these areas in your community?					
Are you aware of any barriers that limit access to government services, such as a lack of transportation or employment services?	27	29	18	41	115
Zoning laws? Example: Laws that restrict placement of group homes.	22	32	21	40	115
Property assessment and tax policies? Example: Lack of tax incentives for making reasonable accommodations or modifications for the disabled.	21	29	25	40	115
Land use policies? Example: Policies that concentrate multi-family housing in limited areas.	20	33	22	40	115
Neighborhood or community development policies? Example: Policies that encourage development in narrowly defined areas of the community.	17	36	22	40	115
Occupancy standards or health and safety codes? Example: Codes being inadequately enforced in immigrant communities.	16	33	26	40	115
Housing construction standards? Example: Lack of or confusing guidelines for construction of accessible housing.	13	33	29	40	115
The permitting process? Example: Not offering written documents on procedures in alternate languages.	12	31	32	40	115
Are there any other public administrative actions or regulations that act as barriers to fair housing choice?	8	26	38	43	115

Only 19 respondents were aware of State fair housing regulations or plans in Alabama, and 17 were aware of policies that affirmatively further fair housing in the State. Some 19 respondents felt there were specific geographic areas in the State that have fair housing problems.

Table IV.81
Federal and State Fair Housing Laws
State of Alabama
Fair Housing Survey

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any State fair housing ordinance, regulation, or plan in Alabama?	19	35	16	45	115
Are you aware of any State policies or practices for "affirmatively furthering fair housing" in Alabama?	17	36	16	46	115
Are there specific geographic areas in the State that have fair housing problems?	19	9	41	46	115

Section V. Fair Housing Goals and Priorities

Overview

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

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

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

Assessing Fair Housing

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

In 1994, HUD published a rule consolidating plans for housing and community development programs into a single planning process. This action grouped the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grants (ESG)[21], and Housing Opportunities for Persons with AIDS (HOPWA) programs into the Consolidated Plan for Housing and Community Development, which then created a single application cycle. As a part of the consolidated planning process, and entitlement communities that receive such funds from HUD are required to submit to HUD certification that they are affirmatively furthering fair housing (AFFH). This was described in the Analysis of Impediments to Fair Housing Choice and a Fair Housing Planning Guide offering methods to conduct such a study was released in March of 1993.

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

[21] The Emergency Shelter Grants program was renamed the Emergency Solutions Grants program in 2011.

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

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

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

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

Overview of Findings

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

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

1. High: Factors that have a direct and substantial impact on fair housing choice, or that Alabama Department of Economic and Community Affairs has no authority or limited authority to mandate change, and no capacity or limited capacity to address.
2. Medium: Factors that have a less direct impact on fair housing choice, or that Alabama Department of Economic and Community Affairs has limited authority to mandate change.
3. Low: Factors that have a slight or largely indirect impact on fair housing choice, or that Alabama Department of Economic and Community Affairs has limited capacity to address.

Table V.1
Contributing Factors
State of Alabama Non-Entitlement Areas

Contributing Factors	Priority	Justification
Moderate to high levels of segregation	High	In 2017, black, American Indian, Asian, Native Hawaiian, "other" race, and Hispanic households had a moderate to high level of segregation, according to the Dissimilarity Index. This level of segregation has grown since 2010.
Access to low poverty areas and concentrations of poverty	High	Low poverty index is markedly lower for black, Native American, and Hispanic populations than white school proficiency, indicating inequitable access to low poverty areas. In addition, there are concentrations of poverty in the Non-Entitlement Areas of the State, particularly in the central and more rural areas of the State.
Access to labor market engagement	Med	Black, Native American, and Hispanic households have less access to labor market engagement as indicated by the Access to Opportunity index. However, the State has little control over impacting labor market engagement on a large scale.
Access to School Proficiency	Med	Black, Native American, and Hispanic households have lower levels of access to proficient schools.
Insufficient affordable housing in a range of unit sizes	High	Some 23.5 percent of households have cost burdens. This is more significant for renter households, of which 37.8 percent have cost burdens. In addition, some 65.4 percent of households below 30 percent HAMFI have housing problems. This signifies a lack of housing options that are affordable to a large proportion of the population.
Black and Hispanic households have disproportionate rates of housing problems	High	The average rate of housing problems, according to CHAS data is 24.9 percent for all households in the State of Alabama Non-Entitlement Areas. Black households face housing problems at rate of 37.4 percent, and Hispanic households at a rate of 37.9 percent.
Discriminatory patterns in Lending	Med	The mortgage denial rates for black, Native American, and Hispanic households are higher than the jurisdiction average according to 2008-2017 HMDA data. This was also true for female applicants during this time period.
Insufficient accessible affordable housing	High	The number of accessible affordable units may not meet the need of the growing elderly and disabled population, particularly as the population continues to age. Some 55.8 percent of persons aged 75 and older have at least one form of disability.
Failure to Make Reasonable Accommodations	High	Disability was the number one fair housing basis for complaints with cause between 2004 and 2014. Failure to make reasonable accommodations accounted for the second largest number of issues for fair housing complaints during this time period.
Lack of fair housing infrastructure	High	The fair housing survey and public input indicated a lack of collaboration among agencies to support fair housing.
Insufficient fair housing education	High	The fair housing survey and public input indicated a lack of knowledge about fair housing and a need for education.
Insufficient understanding of credit	High	The fair housing survey and public input indicated an insufficient understanding of credit needed to access mortgages.

Fair Housing Issues, Contributing Factors, and Proposed Achievements

Table V.2 summarizes the fair housing issues/impediments and contributing factors, including metrics, milestones, and a timeframe for achievements.

Table V.2
Recommended Fair Housing Issues, Contributing Factors, and Recommended Actions
State of Alabama Non-Entitlement Areas

Fair Housing Issues/ Impediments	Contributing Factors	Recommended Actions to be Taken	Responsible Agency
Segregation	Moderate to high levels of segregation	Contract with a Fair Housing Initiate Program (FHIP) participant or other entity to conduct testing and enforcement activities in the non-entitlement areas of Alabama. Record activities annually.	ADECA
R/ECAPs	Access to low poverty areas and concentrations of poverty Moderate to high levels of segregation Discriminatory pattern sin Lending	Review opportunities annually to increase funding sources for additional low-income housing outside R/ECAPs	ADECA
Disparities in Access to Opportunity	Access to low poverty areas and concentrations of poverty Access to labor market engagement Access to School Proficiency	Review opportunities annually to increase funding sources for additional low-income housing outside R/ECAPs	ADECA
Disproportionate Housing Need	Insufficient affordable housing in a range of unit sizes Black and Hispanic households with disproportionate rates of housing problems Discriminatory patterns in Lending	Conduct outreach and education for both housing providers and housing consumers on prospective actions that are in violation of fair housing law, in partnership with state FHIP grantees. Record activities annually. Review opportunities annually to increase funding sources for additional low-income housing outside R/ECAPs	ADECA
Disability and Access	Insufficient accessible affordable housing Failure to Make Reasonable Accommodations	Conduct outreach and education for both housing providers and housing consumers on prospective actions that are in violation of fair housing law. Record activities annually. Conduct audit testing to determine the number of properties currently in violation of disability standards. Record activities annually.	ADECA
Fair Housing Enforcement and Outreach	Insufficient fair housing education Insufficient understanding of credit Insufficient fair housing infrastructure Discriminatory patterns in lending	Continue to promote fair housing education through annual or biannual workshops. Promote annual outreach and education related to credit for prospective homebuyers. Conduct outreach and education for both housing providers and housing consumers on prospective actions that are in violation of fair housing law, in partnership with state FHIP grantees. Record activities annually. Contract with a Fair Housing Initiate Program (FHIP) participant or other entity to conduct testing and enforcement activities in the non-entitlement areas of Alabama. Record activities annually. Continue to publish fair housing information on ADECA's website. Review annually. Continue to use of mandating local communities to use the *Suggested Assessment Guide for Community Assessment of Fair Housing.* Record activities annually. Continue fair housing training for CDBG grantees in annual workshops. Record annually.	ADECA

Section VI. Appendices

A. Additional Plan Data

Table VI.1
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
State of Alabama Non-Entitlement
2008–2017 HMDA Data

Race		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
American Indian	Originated	49	40	44	43	78	95	99	108	119	172	847
	Denied	22	19	17	16	35	32	33	35	52	39	300
	Denial Rate	31%	32.2%	27.9%	27.1%	31%	25.2%	25%	24.5%	30.4%	18.5%	26.2%
Asian	Originated	71	52	59	59	204	271	270	284	359	421	2050
	Denied	19	17	12	15	39	58	40	57	49	58	364
	Denial Rate	21.1%	24.6%	16.9%	20.3%	16%	17.6%	12.9%	16.7%	12%	12.1%	15.1%
Black	Originated	930	717	806	741	1788	1895	2020	2298	2695	3069	16959
	Denied	342	230	261	213	534	588	579	660	669	640	4716
	Denial Rate	26.9%	24.3%	24.5%	22.3%	23%	23.7%	22.3%	22.3%	19.9%	17.3%	21.8%
Pacific Islander	Originated	23	20	10	14	38	34	50	51	51	58	349
	Denied	1	4	0	3	12	7	6	7	12	8	60
	Denial Rate	4.2%	16.7%	0%	17.6%	24%	17.1%	10.7%	12.1%	19%	12.1%	14.7%
White	Originated	8997	7037	6732	6636	15953	17566	18037	20750	23575	25289	150572
	Denied	1730	1361	1444	1282	2711	2909	2816	2832	2928	2945	22958
	Denial Rate	16.1%	16.2%	17.7%	16.2%	14.5%	14.2%	24%	12%	11%	10.4%	13.2%
Not Available	Originated	470	435	389	411	893	840	860	888	1140	1416	7742
	Denied	270	163	156	131	284	287	271	323	310	352	2547
	Denial Rate	36.5%	27.3%	28.6%	24.2%	24.1%	25.5%	24%	26.7%	21.4%	19.9%	24.8%
Not Applicable	Originated	9	0	1	2	2	4	3	6	6	6	39
	Denied	6	1	0	2	1	1	3	0	0	2	16
	Denial Rate	40%	100%	0%	50%	33.3%	20%	50%	0%	0%	25%	29.1%
Total	**Originated**	**10,549**	**8,301**	**8,041**	**7,906**	**18,956**	**20,705**	**21,339**	**24,385**	**27,945**	**30,431**	**178,558**
	Denied	**2,390**	**1,795**	**1,890**	**1,662**	**3,616**	**3,882**	**3,748**	**3,914**	**4,020**	**4,044**	**30,961**
	Denial Rate	**18.5%**	**17.8%**	**19%**	**17.4%**	**16%**	**15.8%**	**14.9%**	**13.8%**	**12.6%**	**11.7%**	**14.8%**
Hispanic	Originated	214	184	187	165	323	406	430	559	647	781	3896
	Denied	72	43	49	36	73	114	93	126	131	143	880
	Denial Rate	25.2%	18.9%	20.8%	17.9%	18.4%	21.9%	17.8%	18.4%	16.8%	15.5%	18.4%
Non-Hispanic	Originated	9832	7655	7458	7344	17704	19415	19948	22870	26030	28158	166414
	Denied	2028	1578	1661	1486	3218	3445	3346	3444	3544	3522	27272
	Denial Rate	17.1%	17.1%	18.2%	16.8%	15.4%	15.1%	14.4%	13.1%	12%	11.1%	14.1%

Table VI.2
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant
State of Alabama Non-Entitlement
2008–2017 HMDA Data

Denial Reason	American Indian	Asian	Black	Pacific Islander	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	41	99	881	9	3444	364	0	4,838	41
Employment History	4	17	68	3	581	52	0	725	4
Credit History	75	38	1282	17	5106	674	1	7,193	75
Collateral	23	21	246	6	2236	306	0	2,838	23
Insufficient Cash	11	7	162	3	775	85	0	1,043	11
Unverifiable Information	4	25	106	3	559	70	0	767	4
Credit Application Incomplete	15	19	223	0	1244	242	0	1,743	15
Mortgage Insurance Denied	0	1	12	0	56	4	0	73	0
Other	16	25	286	4	1548	155	0	2,034	16
Missing	111	112	1,450	15	7,409	595	15	9,707	691
Total	**300**	**364**	**4,716**	**60**	**22,958**	**2,547**	**16**	**30,961**	**880**
% Missing	37%	30.8%	30.7%	25%	32.3%	23.4%	93.8%	31.4%	78.5%

Table VI.3
Loan Applications by Selected Action Taken by Gender of Applicant
State of Alabama Non-Entitlement
2008–2017 HMDA Data

Gender		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
Male	Originated	7641	5906	5701	5685	13377	14728	15266	17418	19519	20765	126006
	Denied	1513	1122	1208	1085	2366	2583	2447	2481	2492	2548	19845
	Denial Rate	16.5%	16%	17.5%	16%	15%	14.9%	13.8%	12.5%	11.3%	10.9%	13.6%
Female	Originated	2657	2139	2102	2023	5079	5410	5527	6409	7639	8659	47644
	Denied	687	565	575	498	1073	1100	1142	1203	1321	1240	9404
	Denial Rate	20.5%	20.9%	21.5%	19.8%	17.4%	16.9%	17.1%	15.8%	14.7%	12.5%	16.5%
Not Available	Originated	243	256	237	196	498	563	543	553	780	971	4840
	Denied	184	107	107	77	176	198	156	230	206	254	1695
	Denial Rate	43.1%	29.5%	31.1%	28.2%	26.1%	26%	22.3%	29.4%	20.9%	20.7%	25.9%
Not Applicable	Originated	8	0	1	2	2	4	3	5	7	36	68
	Denied	6	1	0	2	1	1	3	0	1	2	17
	Denial Rate	42.9%	100%	0%	50%	33.3%	20%	50%	0%	12.5%	5.3%	20%
Total	**Originated**	**10,549**	**8,301**	**8,041**	**7,906**	**18,956**	**20,705**	**21,339**	**24,385**	**27,945**	**30,431**	**178,558**
	Denied	**2,390**	**1,795**	**1,890**	**1,662**	**3,616**	**3,882**	**3,748**	**3,914**	**4,020**	**4,044**	**30,961**
	Denial Rate	**18.5%**	**17.8%**	**19%**	**17.4%**	**16%**	**15.8%**	**14.9%**	**13.8%**	**12.6%**	**11.7%**	**14.8%**

Table VI.4
Denial Rates by Income of Applicant
State of Alabama Non-Entitlement
2008–2017 HMDA Data

Income	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
$30,000 or Below	32.1%	32.5%	33.2%	33.4%	29.5%	30.8%	32.3%	28.7%	27.6%	24.6%	29.9%
$30,001–$50,000	19.1%	18.4%	18.5%	16.8%	17.3%	17.1%	16.8%	15.2%	14.4%	13.7%	16.2%
$50,001–$75,000	15.3%	13.9%	15.2%	13.6%	13.5%	13.3%	12.7%	12.1%	10.7%	10.6%	12.5%
$75,001–$100,000	12.8%	9.6%	12.2%	11%	11.9%	11.3%	9.5%	9.7%	8.4%	7.5%	9.8%
$100,001–$150,000	10.7%	8.1%	13.3%	11.1%	9.3%	9.3%	7.7%	7.9%	7.1%	7.5%	8.4%
Above $150,000	12.9%	12%	9.9%	9.8%	9.5%	10.2%	7.7%	7.5%	7.7%	7.3%	8.6%
Data Missing	33.3%	0%	22.2%	100%	30.8%	0%	30%	25%	6.7%	11.1%	18.3%
Total	**18.5%**	**17.8%**	**19%**	**17.4%**	**16%**	**15.8%**	**14.9%**	**13.8%**	**12.6%**	**11.7%**	**14.8%**

Table VI.5
Loan Applications by Income of Applicant: Originated and Denied
State of Alabama Non-Entitlement
2008–2017 HMDA Data

Income		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
$30,000 or Below	Loan Originated	1,412	1,253	1,290	1,108	2,287	2,296	2,068	2,416	2,495	2,645	1,9270
	Application Denied	668	603	640	555	955	1,024	986	973	953	862	8219
	Denial Rate	32.1%	32.5%	33.2%	33.4%	29.5%	30.8%	32.3%	28.7%	27.6%	24.6%	29.9%
$30,001 –$50,000	Loan Originated	3,389	2,750	2,547	2,506	5,555	5,781	5,986	6,739	7,728	7,979	50,960
	Application Denied	801	619	579	506	1,162	1,190	1,212	1,209	1,295	1,269	9,842
	Denial Rate	19.1%	18.4%	18.5%	16.8%	17.3%	17.1%	16.8%	15.2%	14.4%	13.7%	16.2%
$50,001 –$75,000	Loan Originated	2,921	2,203	2,114	2,126	5,044	5,597	5,939	6,626	7,663	8,372	48,605
	Application Denied	529	357	379	336	785	857	865	910	922	989	6,929
	Denial Rate	15.3%	13.9%	15.2%	13.6%	13.5%	13.3%	12.7%	12.1%	10.7%	10.6%	12.5%
$75,001 – $100, 000	Loan Originated	1,520	1095	1,068	1,100	2,724	3,153	3,334	3934	4,585	5,109	27,622
	Application Denied	223	116	148	136	367	401	348	424	418	414	2,995
	Denial Rate	12.8%	9.6%	12.2%	11%	11.9%	11.3%	9.5%	9.7%	8.4%	7.5%	9.8%
$100,001 –150,000	Loan Originated	911	730	707	761	2,275	2,640	2,711	3,229	3,666	4,340	21,970
	Application Denied	109	64	108	95	232	271	226	278	282	352	2,017
	Denial Rate	10.7%	8.1%	13.3%	11.1%	9.3%	9.3%	7.7%	7.9%	7.1%	7.5%	8.4%
Above $150,000	Loan Originated	392	265	308	305	1,062	1,227	1,294	1,429	1,794	1,970	10,046
	Application Denied	58	36	34	33	111	139	108	116	149	156	940
	Denial Rate	12.9%	12%	9.9%	9.8%	9.5%	10.2%	7.7%	7.5%	7.7%	7.3%	8.6%
Data Missing	Loan Originated	4	5	7	0	9	11	7	12	14	16	85
	Application Denied	2	0	2	1	4	0	3	4	1	2	19
	Denial Rate	33.3%	0%	22.2%	100%	30.8%	0%	30%	25%	6.7%	11.1%	18.3%
Total	**Loan Originated**	**10,549**	**8,301**	**8,041**	**7,906**	**18,956**	**20,705**	**21,339**	**24,385**	**27,945**	**30,431**	**178,558**
	Application Denied	**2,390**	**1,795**	**1,890**	**1,662**	**3,616**	**3,882**	**3,748**	**3,914**	**4,020**	**4,044**	**30,961**
	Denial Rate	**18.5%**	**17.8%**	**19%**	**17.4%**	**16%**	**15.8%**	**14.9%**	**13.8%**	**12.6%**	**11.7%**	**14.8%**

Table VI.6
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
State of Alabama Non-Entitlement
2008–2017 HMDA Data

Race	$30,000 or Below	$30,001 – $50,000	$50,001 –$75,000	$75,001 –$100,000	$100,001 –$150,000	> $150,000	Data Missing	Average
American Indian	51.5%	27.9%	21.5%	18.2%	11.1%	8.3%	0%	26.2%
Asian	34.2%	20.4%	12.4%	7.5%	7.2%	11.9%	100%	15.1%
Black	40.3%	21.8%	17.9%	15.7%	13.5%	14.1%	%	21.8%
Pacific Islander	40%	17.3%	8.3%	10.3%	2.1%	13%	0%	14.7%
White	27%	14.6%	11.2%	8.7%	7.5%	7.5%	15.8%	13.2%
Not Available	50.5%	28.4%	20.4%	17.4%	15.4%	17.2%	50%	24.8%
Not Applicable	32.7%	0%	0%	0%	0%	%	%	29.1%
Average	**29.9%**	**16.2**	**12.5%**	**9.8%**	**8.4%**	**8.6%**	**18.3%**	**14.8%**
Non-Hispanic	34.5%	19.1	13%	13.2%	8%	4.8%	%	18.4%
Hispanic	28.6%	15.5	12%	9.2%	7.9%	8%	14.6%	14.1%

Table VI.7
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
State of Alabama Non-Entitlement
2008–2017 HMDA Data

Race		$30,000 or Below	$30,001 – $50,000	$50,001 –$75,000	$75,001 –$100,000	$100,001 –$150,000	> $150,000	Data Missing	Total
American Indian	Loan Originated	94	217	248	139	104	44	1	847
	Application Denied	100	84	68	31	13	4	0	300
	Denial Rate	51.5%	27.9%	21.5%	18.2%	11.1%	8.3%	0%	26.2%
Asian	Loan Originated	181	433	567	397	309	163	0	2050
	Application Denied	94	111	80	32	24	22	1	364
	Denial Rate	34.2%	20.4%	12.4%	7.5%	7.2%	11.95	100%	15.1%
Black	Loan Originated	1909	5608	5094	2215	1601	532	0	16959
	Application Denied	1291	1563	1113	413	249	87	0	4716
	Denial Rate	40.3%	21.8%	17.9%	15.7%	13.5%	14.1%	%	14.7%
Pacific Islander	Loan Originated	33	86	111	52	46	20	1	349
	Application Denied	22	18	10	6	1	3	0	60
	Denial Rate	40%	17.3%	8.3%	10.3%	2.1%	13%	0%	14.7%
White	Loan Originated	16399	42750	40461	23441	18730	8711	80	150572
	Application Denied	6062	7325	5114	2223	1515	704	15	22958
	Denial Rate	27%	14.6%	11.2%	8.7%	7.5%	7.5%	15.8%	13.2%
Not Available	Loan Originated	621	1865	2123	1377	1177	576	3	7742
	Application Denied	634	741	544	290	215	120	3	2547
	Denial Rate	50.5%	28.4%	20.4%	17.4%	15.4%	17.2%	50%	24.8%
Not Applicable	Loan Originated	33	1	1	1	3	0	0	39
	Application Denied	16	0	0	0	0	0	0	16
	Denial Rate	32.7%	0%	0%	0%	0%	%	%	29.1%
Total	**Loan Originated**	**19270**	**50960**	**48605**	**27622**	**21970**	**10046**	**85**	**178,558**
	Application Denied	**8219**	**9842**	**6929**	**2995**	**2017**	**940**	**19**	**30,961**
	Denial Rate	**29.9%**	**16.2%**	**12.5%**	**9.8%**	**8.4%**	**8.6%**	**18.3**	**14.8%**
Hispanic	Loan Originated	630	1129	1090	511	378	158	0	3896
	Application Denied	332	266	163	78	33	8	0	880
	Denial Rate	34.5%	19.1%	13%	13.2%	8%	4.8%	%	18.4%
Non-Hispanic	Loan Originated	17960	47844	45225	25652	20353	9298	82	166414
	Application Denied	7181	8770	6145	2602	1750	810	14	27272
	Denial Rate	28.6%	15.5%	12%	9.2%	7.9%	8%	14.6%	14.1%

Table VI.8
Originated Owner-Occupied Loans by HAL Status
State of Alabama Non-Entitlement
2008–2017 HMDA Data

Loan Type	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
HAL	1,289	711	162	209	387	358	309	319	285	283	4312
Other	9,260	7,590	7,879	7,697	18,569	20,347	21,030	24,066	27,660	30,148	174,246
Total	**10,549**	**8,301**	**8,041**	**7,906**	**18,956**	**20,705**	**21,339**	**24,385**	**27,945**	**30,431**	**178,558**
Percent HAL	12.2%	8.6%	2%	2.6%	2%	1.7%	1.4%	1.3%	1%	0.9%	2.4%

Table VI.9
Loans by Loan Purpose by HAL Status
State of Alabama Non-Entitlement
2008–2017 HMDA Data

Loan Purpose		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
Home Purchase	HAL	1,289	711	162	209	387	358	309	319	285	283	4,312
	Other	9,260	7,590	7,879	7,697	18,569	2,0347	21,030	24,066	27,660	30,148	17,4246
	Percent HAL	12.2%	8.6%	2%	2.6%	2%	1.7%	1.4%	1.3%	1%	0.9%	2.4%
Home Improvement	HAL	764	407	134	162	178	146	145	115	107	151	2,309
	Other	2,342	1,934	1,935	2,163	4,091	4,302	4,233	4,543	4,991	5,151	35,685
	Percent HAL	24.6%	17.4%	6.5%	7%	4.2%	3.3%	3.3%	2.5%	2.1%	2.8%	2.4%
Refinancing	HAL	4,462	2,728	392	476	837	660	431	377	316	313	10,992
	Other	12,241	18,636	16,472	13,865	40,458	35,210	17,030	20,717	23,864	17,814	216,307
	Percent HAL	26.7%	12.8%	2.3%	3.3%	2%	1.8%	2.5%	1.8%	1.3%	1.7%	2.4%
Total	**HAL**	**6,515**	**3,846**	**688**	**847**	**1,402**	**1,164**	**885**	**811**	**708**	**747**	**17,613**
	Other	**23,843**	**28,160**	**26,286**	**23,725**	**63,118**	**59,859**	**42,293**	**49,326**	**56,515**	**53,113**	**426,238**
	Percent HAL	**21.5%**	**12%**	**2.6%**	**3.4%**	**2.2%**	**1.9%**	**2%**	**1.6%**	**1.2%**	**1.4%**	**4%**

Table VI.10
HALs Originated by Race of Borrower
State of Alabama Non-Entitlement
2008–2017 HMDA Data

Race	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
American Indian	14	14	6	6	7	6	4	5	2	2	64
Asian	6	7	1	0	3	5	2	3	2	0	29
Black	127	60	12	13	26	23	15	24	17	28	317
Pacific Islander	0	0	0	0	0	1	0	1	1	1	3
White	1,104	614	143	187	349	321	287	282	259	244	3,546
Not Available	37	16	0	3	1	2	1	4	4	8	68
Not Applicable	1	0	0	0	1	0	0	0	0	0	2
Total	**1289**	**711**	**162**	**209**	**387**	**358**	**309**	**319**	**285**	**283**	**4312**
Hispanic	40	33	15	9	14	9	18	26	22	29	2,929
Non-Hispanic	1,195	659	146	198	370	346	289	289	258	246	134,506

Table VI.11
Rate of HALs Originated by Race/Ethnicity of Borrower
State of Alabama Non-Entitlement
2008–2017 HMDA Data

Race	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Average
American Indian	28.6%	35%	13.6%	14%	9%	6.3%	4%	4.6%	1.7%	1.2%	9.5%
Asian	8.5%	13.5%	1.7%	0%	1.5%	1.8%	0.7%	1.1%	0.6%	0%	1.8%
Black	13.7%	8.4%	1.5%	1.8%	1.5%	1.2%	0.7%	1%	0.6%	0.9%	2.3%
Pacific Islander	0%	0%	0%	0%	0%	2.9%	0%	2%	2%	1.7%	1%
White	12.3%	8.7%	2.1%	2.8%	2.2%	1.8%	1.6%	1.4%	1.1%	1%	2.8%
Not Available	7.9%	3.7%	0%	0.7%	0.1%	0.2%	0.1%	0.5%	0.4%	0.6%	1.1%
Not Applicable	11.1%	%	0%	0%	50%	0%	0%	0%	0%	0%	6.1%
Average	**12.2%**	**8.6%**	**2%**	**2.6%**	**2%**	**1.7%**	**1.4%**	**1.3%**	**1%**	**0.9%**	**2.4%**
Hispanic	18.7%	17.9%	8%	5.5%	4.3%	2.2%	4.2%	4.7%	3.4%	3.7%	6%
Non-Hispanic	12.2%	8.6%	2%	2.7%	2.1%	1.8%	1.4%	1.3%	1%	0.9%	2.7%

Table VI.12
Loans by HAL Status by Race/Ethnicity of Borrower
State of Alabama Non-Entitlement
2008–2017 HMDA Data

Race	Loan Type	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
American Indian	HAL	14	14	6	6	7	6	4	5	2	2	64
	Other	35	26	38	37	71	89	95	103	117	170	611
	Percent HAL	28.6%	35%	13.6%	14%	9%	6.3%	4%	4.6%	1.7%	1.2%	9.5%
Asian	HAL	6	7	1	0	3	5	2	3	2	0	29
	Other	65	45	58	59	201	266	268	281	357	421	1,600
	Percent HAL	8.5%	13.5%	1.7%	0%	1.5%	1.8%	0.7%	1.1%	0.6%	0%	1.8%
Black	HAL	127	60	12	13	26	23	15	24	17	28	317
	Other	803	657	794	728	1762	1872	2005	2274	2678	3041	13,573
	Percent HAL	13.7%	8.4%	1.5%	1.8%	1.5%	1.2%	0.7%	1%	0.6%	0.9%	2.3%
Pacific Islander	HAL	0	0	0	0	0	1	0	1	1	1	3
	Other	23	20	10	14	38	33	50	50	50	57	288
	Percent HAL	0%	0%	0%	0%	0%	2.9%	0%	2%	2%	1.7%	1%
White	HAL	1,104	614	143	187	349	321	287	282	259	244	3,546
	Other	7893	6423	6589	6449	15604	17245	17750	20468	23316	25045	121,737
	Percent HAL	12.3%	8.7%	2.1%	2.8%	2.2%	1.8%	1.6%	1.4%	1.1%	1%	2.8%
Not Available	HAL	37	16	0	3	1	2	1	4	4	8	68
	Other	433	419	389	408	892	838	859	884	1136	1408	13,573
	Percent HAL	7.9%	3.7%	0%	0.7%	0.1%	0.2%	0.1%	0.5%	0.4%	0.6%	1.1%
Not Applicable	HAL	1	0	0	0	1	0	0	0	0	0	2
	Other	8	0	1	2	1	4	3	6	6	6	31
	Percent HAL	11.1%	%	0%	0%	50%	0%	0%	0%	0%	0%	6.1%
Total	**HAL**	**1289**	**711**	**162**	**209**	**387**	**358**	**309**	**319**	**285**	**283**	**4312**
	Other	**9260**	**7590**	**7879**	**7697**	**18569**	**20347**	**21030**	**24066**	**27660**	**30148**	**174246**
	Percent HAL	**12.2%**	**8.6%**	**2%**	**2.6%**	**2%**	**1.7%**	**1.4%**	**1.3%**	**1%**	**0.9%**	**2.4%**
Hispanic	HAL	40	33	15	9	14	9	18	26	22	29	2,929
	Other	174	151	172	156	309	397	412	533	625	752	186
	Percent HAL	18.7%	17.9%	8%	5.5%	4.3%	2.2%	4.2%	4.7%	3.4%	3.7%	6%
Non-Hispanic	HAL	1,195	659	146	198	370	346	289	289	258	246	134,506
	Other	8637	6996	7312	7146	17334	19069	19659	22581	25772	27912	3,750
	Percent HAL	12.2%	8.6%	2%	2.7%	2.1%	1.8%	1.4%	1.3%	1%	0.9%	2.7%

Table VI.13
Rates of HALs by Income of Borrower
State of Alabama Non-Entitlement
2008–2017 HMDA Data

Income	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Average
$30,000 or Below	19.5%	12.5%	4.3%	5.1%	3.5%	2.7%	2.5%	2.4%	2.8%	1.8%	5.2%
$30,001–$50,000	13.4%	7.9%	1.8%	2.6%	1.9%	1.7%	1.6%	1.6%	1%	1.2%	2.9%
$50,001–$75,000	10.1%	6.8%	1.4%	2.1%	1.8%	1.7%	1.2%	1.2%	0.9%	0.8%	2.3%
$75,001–$100,000	8.3%	8.1%	1.7%	1.9%	1.9%	1.4%	1.1%	0.8%	0.7%	0.5%	2%
$100,00–150,000	9.9%	9.2%	1%	1.7%	1.6%	1.5%	1.1%	0.9%	0.5%	0.6%	1.9%
Above $150,000	12.5%	11.7%	1.9%	2.6%	2%	1.7%	1.9%	1%	0.9%	1%	2.4%
Data Missing	0%	40%	0%	%	0%	0%	0%	0%	0%	0%	2.4%
Average	**12.2%**	**8.6%**	**2%**	**2.6%**	**2%**	**1.7%**	**1.4%**	**1.3%**	**1%**	**0.9%**	**2.4%**

Table VI.14
Loans by HAL Status by Income of Borrower
State of Alabama Non-Entitlement
2008–2016 HMDA Data

Income		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
$30,000 or Below	HAL	275	156	55	56	81	61	52	57	71	48	864
	Other	1,137	1,097	1,235	1,052	2,206	2,235	2,016	2,359	2,424	2,597	15,761
	Percent HAL	19.5%	12.5%	4.3%	5.1%	3.5%	2.7%	2.5%	2.4%	2.8%	1.8%	5.2%
$30,001 –$50,000	HAL	454	216	47	66	104	99	95	107	78	98	1,266
	Other	2,935	2,534	2,500	2,440	5,451	5,682	5,891	6,632	7,650	7,881	41,715
	Percent HAL	13.4%	7.9%	1.8%	2.6%	1.9%	1.7%	1.6%	1.6%	1%	1.2%	2.9%
$50,001 –$75,000	HAL	295	150	29	45	92	93	71	79	69	64	923
	Other	2,626	2,053	2,085	2,081	4,952	5,504	5,868	6,547	7,594	8,308	39,310
	Percent HAL	10.1%	6.8%	1.4%	2.1%	1.8%	1.7%	1.2%	1.2%	0.9%	0.8%	2.3%
$75,001 – $100, 000	HAL	126	89	18	21	52	44	36	32	34	26	452
	Other	1,394	1,006	1,050	1,079	2,672	3,109	3,298	3,902	4,551	5,083	22,061
	Percent HAL	8.3%	8.1%	1.7%	1.9%	1.9%	1.4%	1.1%	0.8%	0.7%	0.5%	2%
$100,001 –150,000	HAL	90	67	7	13	37	40	31	30	17	27	332
	Other	821	663	700	748	2,238	2,600	2,680	3,199	3,649	4,313	17,298
	Percent HAL	9.9%	9.2%	1%	1.7%	1.6%	1.5%	1.1%	0.9%	0.5%	0.6%	1.9%
Above $150,000	HAL	49	31	6	8	21	21	24	14	16	20	190
	Other	343	234	302	297	1,041	1,206	1,270	1,415	1,778	1,950	7,886
	Percent HAL	12.5%	11.7%	1.9%	2.6%	2%	1.7%	1.9%	1%	0.9%	1%	2.4%
Data Missing	HAL	0	2	0	0	0	0	0	0	0	0	2
	Other	4	3	7	0	9	11	7	12	14	16	83
	Percent HAL	0%	40%	0%	%	0%	0%	0%	0%	0%	0%	2.4%
Total	**Other**	**1,289**	**711**	**162**	**209**	**387**	**358**	**309**	**319**	**285**	**283**	**4,312**
	HAL	**9,260**	**7,590**	**7,879**	**7,697**	**18,569**	**20,347**	**21,030**	**24,066**	**27,660**	**30,148**	**174,246**
	Percent HAL	**12.2%**	**8.6%**	**2%**	**2.6%**	**2%**	**1.7%**	**1.4%**	**1.3%**	**1%**	**0.9%**	**2.4%**

B. Additional Survey Data

Fair Housing Survey Data: State of Alabama Entitlement Area

Table VI.15
Which areas of Alabama do you wish to address in this survey?
State of Alabama Entitlement Area
Fair Housing Survey

Area	Total
State of Alabama Entitlement Area	81
State of Alabama Non-Entitlement Area	0
Other	0

Table VI.16
What are your primary roles in the housing industry?
State of Alabama Entitlement Area
Fair Housing Survey

Role	Total
Advocate	16
Appraisal	0
Banking/Finance	14
Construction/Development	3
Insurance	0
Law/Legal Services	0
Local Government	9
Property Manager	9
Real Estate	2
Service Provider	17
Professional Services	3
Other	7
Missing	1
Total	**81**

Table VI.17
Are you a:
State of Alabama Entitlement Area
Fair Housing Survey

Response	Total
Homeowner	37
Renter/Tenant	17
Other	27
Missing	0
Total	**81**

Table VI.18
How familiar are you with fair housing laws?
State of Alabama Entitlement Area
Fair Housing Survey

Response	Total
Not Familiar	4
Somewhat Familiar	28
Very Familiar	26
Missing	23
Total	**81**

Table VI.19
Federal and State Fair Housing Laws
State of Alabama Entitlement Area
Fair Housing Survey

Question	Yes	No	Don't Know	Missing	Total
Do you think fair housing laws serve a useful purpose?	59	0	1	21	81
Do you think fair housing laws are difficult to understand or follow?	23	29	6	23	81
Do you feel that fair housing laws are adequately enforced in the State of Alabama?	15	21	24	21	81
Based on your knowledge of fair housing law, do you think that additional groups should be protected under the State fair housing law?	31	15	13	22	81
Outreach and education activities, such as training and seminars, are used to help people better understand their rights and obligations under fair housing law. Are you aware of any educational activities or training opportunities available to you to learn about fair housing laws?	33	16	4	28	81
If you answered "yes" to the previous question, have you participated in fair housing activities or training?	30	10	1	40	81
Fair housing testing is often used to assess potential violations of fair housing law. Testing can include activities such as evaluating building practices to determine compliance with accessibility laws or testing if some people are treated differently when inquiring about available rental units. Are you aware of any fair housing testing of any sort in the State?	13	27	12	29	81

Table VI.20
Fair Housing Barriers
State of **Alabama Entitlement Area**
Fair Housing Survey

Question	Too Much	The Right Amount	Too Little	Don't Know	Missing	Total
Please assess the level of fair housing outreach and education activity in the State.	0	12	30	11	28	81
Please assess the current level of fair housing testing in the State.	3	5	11	33	29	81

Table VI.21
Fair Housing Testing and Activities
State of Alabama Entitlement Area
Fair Housing Survey

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any impediments to Fair Housing Choice in these areas of the State?					
The real estate industry? Example: Only showing properties to families with children in certain areas.	8	26	14	33	81
The real estate industry? Example: Only showing properties to families with children in certain areas.	9	21	14	37	81
The mortgage and home lending industry? Example: Offering higher interest rates to women or racial minorities.	16	19	14	32	81
The housing construction or housing design fields? Example: New rental complexes built with narrow doorways that do not allow wheelchair accessibility.	5	22	22	32	81
The home insurance industry? Example: Limiting policies and coverage for racial minorities.	12	18	18	33	81
The home appraisal industry? Example: Basing home values on the ethnic composition of neighborhoods.	17	16	15	33	81
Any other housing services?	8	15	16	42	81

Table VI.22
Fair Housing Barriers
State of **Alabama Entitlement Area**
Fair Housing Survey

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any "impediments to fair housing choice" in these areas in your community?					
Land use policies? Example: Policies that concentrate multi-family housing in limited areas.	16	20	14	31	81
Zoning laws? Example: Laws that restrict placement of group homes.	15	20	15	31	81
Occupancy standards or health and safety codes? Example: Codes being inadequately enforced in immigrant communities.	13	17	20	31	81
Property assessment and tax policies? Example: Lack of tax incentives for making reasonable accommodations or modifications for the disabled.	15	17	18	31	81
The permitting process? Example: Not offering written documents on procedures in alternate languages.	10	16	24	31	81
Housing construction standards? Example: Lack of or confusing guidelines for construction of accessible housing.	12	17	21	31	81
Neighborhood or community development policies? Example: Policies that encourage development in narrowly defined areas of the community.	14	21	15	31	81
Are you aware of any barriers that limit access to government services, such as a lack of transportation or employment services?	18	17	15	31	81
Are there any other public administrative actions or regulations that act as barriers to fair housing choice?	5	15	28	33	81

Table VI.23
Federal and State Fair Housing Laws
State of Alabama Entitlement Area
Fair Housing Survey

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any State fair housing ordinance, regulation, or plan in Alabama?	10	26	11	34	81
Are you aware of any State policies or practices for "affirmatively furthering fair housing" in Alabama?	11	25	11	34	81
Are there specific geographic areas in the State that have fair housing problems?	12	8	27	34	81

Fair Housing Survey Data: State of Alabama Non-Entitlement Area

Table VI.24 Which areas of Alabama do you wish to address in this survey? State of Alabama Non-Entitlement Area Fair Housing Survey	
Area	**Total**
State of Alabama Entitlement Area	0
State of Alabama Non-Entitlement Area	34
Other	0

Table VI.25 What are your primary roles in the housing industry? State of Alabama Non-Entitlement Area Fair Housing Survey	
Role	**Total**
Advocate	1
Appraisal	0
Banking/Finance	7
Construction/Development	2
Insurance	0
Law/Legal Services	1
Local Government	7
Property Manager	0
Real Estate	0
Service Provider	4
Professional Services	2
Other	10
Missing	0
Total	**34**

Table VI.26 Are you a: State of Alabama Non-Entitlement Area Fair Housing Survey	
Response	**Total**
Homeowner	20
Renter/Tenant	4
Other	10
Missing	0
Total	**34**

Table VI.27
How familiar are you with fair housing laws?
State of Alabama Non-Entitlement Area
Fair Housing Survey

Response	Total
Not Familiar	1
Somewhat Familiar	12
Very Familiar	14
Missing	7
Total	**34**

Table VI.28
Federal and State Fair Housing Laws
State of Alabama Non-Entitlement Area
Fair Housing Survey

Question	Yes	No	Don't Know	Missing	Total
Do you think fair housing laws serve a useful purpose?	25	0	0	9	34
Do you think fair housing laws are difficult to understand or follow?	11	12	3	8	34
Do you feel that fair housing laws are adequately enforced in the State of Alabama?	11	6	9	8	34
Based on your knowledge of fair housing law, do you think that additional groups should be protected under the State fair housing law?	6	9	11	8	34
Outreach and education activities, such as training and seminars, are used to help people better understand their rights and obligations under fair housing law. Are you aware of any educational activities or training opportunities available to you to learn about fair housing laws?	15	9	1	9	34
If you answered "yes" to the previous question, have you participated in fair housing activities or training?	12	7	0	15	34
Fair housing testing is often used to assess potential violations of fair housing law. Testing can include activities such as evaluating building practices to determine compliance with accessibility laws or testing if some people are treated differently when inquiring about available rental units. Are you aware of any fair housing testing of any sort in the State?	6	10	9	9	34

Table VI.29
Fair Housing Barriers
State of **Alabama Non-Entitlement Area**
Fair Housing Survey

Question	Too Much	The Right Amount	Too Little	Don't Know	Missing	Total
Please assess the level of fair housing outreach and education activity in the State.	0	5	12	8	9	34
Please assess the current level of fair housing testing in the State.	1	3	5	16	9	34

Table VI.30
Fair Housing Testing and Activities
State of Alabama Non-Entitlement Area
Fair Housing Survey

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any impediments to Fair Housing Choice in these areas of the State?					
The real estate industry? Example: Only showing properties to families with children in certain areas.	3	16	6	9	34
The real estate industry? Example: Only showing properties to families with children in certain areas.	2	16	5	11	34
The mortgage and home lending industry? Example: Offering higher interest rates to women or racial minorities.	3	16	6	9	34
The housing construction or housing design fields? Example: New rental complexes built with narrow doorways that do not allow wheelchair accessibility.	2	15	8	9	34
The home insurance industry? Example: Limiting policies and coverage for racial minorities.	3	17	5	9	34
The home appraisal industry? Example: Basing home values on the ethnic composition of neighborhoods.	3	15	7	9	34
Any other housing services?	1	13	6	14	34

Table VI.31
Fair Housing Barriers
State of **Alabama Non-Entitlement Area**
Fair Housing Survey

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any "impediments to fair housing choice" in these areas in your community?					
Land use policies? Example: Policies that concentrate multi-family housing in limited areas.	4	13	8	9	34
Zoning laws? Example: Laws that restrict placement of group homes.	7	12	6	9	34
Occupancy standards or health and safety codes? Example: Codes being inadequately enforced in immigrant communities.	3	16	6	9	34
Property assessment and tax policies? Example: Lack of tax incentives for making reasonable accommodations or modifications for the disabled.	6	12	7	9	34
The permitting process? Example: Not offering written documents on procedures in alternate languages.	2	15	8	9	34
Housing construction standards? Example: Lack of or confusing guidelines for construction of accessible housing.	1	16	8	9	34
Neighborhood or community development policies? Example: Policies that encourage development in narrowly defined areas of the community.	3	15	7	9	34
Are you aware of any barriers that limit access to government services, such as a lack of transportation or employment services?	9	12	3	10	34
Are there any other public administrative actions or regulations that act as barriers to fair housing choice?	3	11	10	10	34

Table VI.32
Federal and State Fair Housing Laws
State of Alabama Non-Entitlement Area
Fair Housing Survey

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any State fair housing ordinance, regulation, or plan in Alabama?	9	9	5	11	34
Are you aware of any State policies or practices for "affirmatively furthering fair housing" in Alabama?	6	11	5	12	34
Are there specific geographic areas in the State that have fair housing problems?	7	1	14	12	34

C. Public Input Data

Public Housing Forum

Presentation

Comment: I just want to know if our legislators are required to see this?

Presenter: You know, this is a public meeting. They have the right to be here. They have the right to see the study. It is going to be online. The State could forward it to them. You as a citizen of the state of Mississippi, Alabama, please share that information with your officials, local, state, and nation. you know, most, most of time they don't know it exists. They only hear about the problem when somebody didn't get something. Why do you think that's what's causing them to stay so strong? Don't be afraid, you know the answer.

Comment: The property ownership.

Presenter: What about the property ownership?

Comment: Especially the rural areas.

Presenter: It could be historical; grandmama live there. I'm going to live there, my kids are going to live there. It could be their property. It could be falling down, who knows? But they just will not move and its choice. You have a choice. Anything else?

Comment: You got a number of education, jobs, infrastructure, then having worked with the state now, you know for a long, long time. One thing I can say that legislators may not be familiar you know, at a micro level as to what is exactly happening in enforcement over the years to bring development to some of the areas you know, which have been left behind is not ready, but attained a state have been making progress. And I can give you an example. You know, one of the new program that has come along is Opportunity Loan Program and the governor right after they decided you know it is very easy to put all the zones in urban area, but the governor or said no, every county to have at least one zone. So, all 67 counties in Alabama have the opportunity zone, in addition to the State of Alabama is actually ahead of the game actually putting money, $50 million towards the project in opportunity zone. So, these are all examples of an opportunity zone by the very nature of the area, you know, the child in distress and left behind.

Presenter: So, opportunity, opportunity zones may over time since those areas where education, it could be a factor; better schools and but how did those areas get access to that? That's what the State has to kind of figure out disparities.

Presentation

Comment: We are incentivizing developers and we have been doing so for the past four years to set aside units, more disabled, homeless, low income, deeper low income for extremely low income. So, we're doing things and then we've introduced a Housing Trust Fund. And we're having a hard time. People need to come in and apply for those funds, but we are, you know, working ways around it. We're using applicants that are applying for those additional funds, of

course they target extremely low income earners a preference for veterans, but we've also in our new plan our 2020 Plan package for disabled individuals as well.

Presenter: Housing Trust Fund needs to be applied for and it's the first thing you hear about sometime is where there's no money.

Comment: We have money, it's a grant and it's an open application cycle.

Presenter: Open application.

Comment: We built one house.

Presenter: One is better than zero.

Comment: (Not Discernable) extremely low income, is that a HUD requirement.

Comment: Yes.

Comment: And you know, that makes it very, very difficult.

Comment: You have to have some type of rental assistance.

Comment: You know, the reality is when you low income people, medium income people have difficulty and yet HUD is targeting extremely low income. Now, I'm not saying that they don't have a housing need. They certainly do, but that makes the program more difficult to implement.

Comment: Because you have to have money to maintain the units over 30 years in someone manage them and to operate.

Presenter: Those who worked in HUD programs, those regulations…

Comment: They are tough.

Presenter: It's not the state's fault, you know, just trying to follow requirements.

Presentation

(Not Discernable)

Comment: Yeah, we will have it will have all our presentations online.

Comment: So, when we go to our survey, we can print it out?

Presentation: Yes ma'am.

Comment: We will yes, we'll have what we do is once a day is over, we have all our presentations. We have our IT people put all of our presentations on the ADECA website. So hopefully as of tomorrow if not tomorrow, if not tomorrow, then Thursday depending on where people can get it on. They should everything should be online on the ADECA website. And if you need me to show you how to access it before you leave here today.

Presenter: The survey works with iPhone, Android. All carries AT&T, T-Mobile. So, feel free. You know, laptops, iPads sleep. Any questions?

Comment: Yes, the preliminary data. I know you have a three step process. Well one of the concerns I always have with public meetings is the information is not provided in detail prior to the meeting. So, will the information that you accumulate today for that presentation will it be made available prior to the meeting?

Presentation: Yes what will happen once the public input process is over, the preliminary filing will be put together in the draft report, the state will disseminate the draft report statewide to and even citizens prior to the review, can review it make comments, and then they will have a review session to go over the entire document. And that that time again, you will have an opportunity to I think, you mentioned the Consolidated Plan, how many pages it was.

Comment: 487.

Comment: So, if you're going to print it out, and make the notes and when I see you back in February, March, we will go over it at that time. Any questions, comments?

Presentation

Comment: Are you going to be able to tell the people who are taking the survey? Break them down, how many of them are bankers, realtors, people like us?

Presenter: Yes, what will happen the link will stay live as long as we keep collecting and what if they identify themselves as what their role is? It will be broken down as to who took the survey?

Comment: Because you know disseminate that survey to all groups that are kind of surprised that we don't have the larger number then we do.

(Not Discernable)

Comment: Will it reflect the zip codes, specific geographic area?

Presenter: I believe it does, actually and where they live.

Comment: Does it by zip code or county?

Comment: The county.

Comment: it doesn’t ask for the zip code, just the county.

Comment: I just pulled it up. This is our website. Here's our address. Don't know how. Sorry. It's not showing. Well, that's interesting.

Presenter: There you go yeah.

Comment: yeah. Surveymonkey.com

Presenter: Surveymonkey.com/r/2019Alabama_fhsurvey.

Presentation

Public Notices

CITY OF OPELIKA
204 SOUTH SEVENTH STREET (36801)
POST OFFICE BOX 390 (36803-0390)
OPELIKA, ALABAMA
PH: (334) 705-5120
Mont. Adv. 2/12, 2/19, 2/26/2020

NOTICE OF PUBLIC MEETING
and NOTICE OF AVAILABILITY for
ALABAMA'S ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE
DRAFT FOR PUBLIC REVIEW

Para una versión española de este aviso de audiencia, visite www.adeca.alabama.gov. Para traducciones al español de los documentos mencionados en este aviso, escriba al Departamento de Alabama de Asuntos Económicos y de la Comunidad, PO Box 5690, Montgomery, Alabama 36103-5690, o por correo electrónico Shabbir.olia@adeca.alabama.gov.

The State of Alabama is required by the U.S. Department of Housing and Urban Development (HUD) to conduct an Analysis of Impediments to Fair Housing Choice (AI) every five years. The AI provides an assessment of the State's current compliance with federal and state fair housing laws, rules, and regulations. The State has the completed a draft version of the AI entitled AI Draft for Public Review. The purpose of this notice is to make the AI Draft for Public Review available to the public for comments prior to its finalization into the final AI. Beginning February 18, 2020, the AI Draft for Public Review may be viewed at www.adeca.alabama.gov or at the Alabama Department of Economic and Community Affairs (ADECA), Suite 500, 401 Adams Avenue, Montgomery, Alabama 36103, for a 30-day public comment period that will end on March 18, 2020. Please send your written comments to Mr. Shabbir Olia at the above ADECA address or email your comments to Mr. Olia at Shabbir.olia@adeca.alabama.gov.

Representatives from ADECA and Western Economic Services, LLC of Portland, Oregon, will also hold a public meeting to discuss the AI Draft for Public Review on the date, time, and location shown below:
Date: Wednesday, March 4, 2020
Time: 9:00 a.m.
Place: Alabama Center for Commerce, 7th Floor Auditorium,
401 Adams Avenue, Montgomery, Alabama 36104.

The purpose of this public meeting is to provide general information on fair housing issues in Alabama and to receive input from interested parties on the AI Draft for Public Review. Attendees may offer their comments at this public meeting and/or submit written comments to ADECA no later than the March 18, 2020 ending date of the public comment period as described above. ADECA recommends that all persons attending this public meeting should pre-register with ADECA by 4:00 p.m. on Tuesday, March 3, 2020 by calling Teresa Nobles at (334)242-0492 or emailing her at teresa.nobles@adeca.alabama.gov. On-sight registration for the public meeting will begin at 8:30 a.m. on Wednesday, March 4, 2020. Free parking will be available in the Alabama Center for Commerce Parking Deck located at 400 Adams Avenue (across the street from the Alabama Center for Commerce), attendees must use the South Decatur Street entrance to the parking deck, and the access code is 988648. The location of the public meeting is accessible to persons with disabilities. Persons who are in need of further information or have a disability requiring special materials, services, or assistance should contact Ms. Nobles, email her, or write to her at the address above no later than Tuesday, March 3, 2020.
Mont. Adv. 02/12/2020
4041055

Public Notices

bids must be addressed, as follows, and delivered to Montgomery County Commission: Attention: Purchasing Department, Montgomery County Administrative Building Annex III, Montgomery, AL 36104: "Rebuild Alabama Project No.'s RA MCP 51-01-2020 through RA MCP 51-06-2020 and Resurfacing County Roads Project No. MCP 51-07-20, Bid No. 53108-208-012."
A cashier's check or bid bond payable to the Montgomery County Commission in an amount not less than five (5) percent of the amount of the bid, but in no event more than $50,000, must accompany the bidder's proposal, unless otherwise indicated.
A performance bond in the form and terms approved by the County in amount not less than the contract price will be required at the signing of the contract. A payment bond in the form and terms approved by the County in amount not less than fifty (50) percent of the contract price shall also be required at the singing of the contract. In addition, the Contractor must furnish to the County, at the time of the signing of the contract, a certificate of insurance coverage as provided in the proposal.
Plans and specifications may be examined at the Montgomery County Engineer's Office, Room 294, Montgomery County Administrative Building Annex I, Montgomery, AL 36104 and purchased for a fee of fifty dollars ($50.00); twenty-five dollars ($25.00) for the proposal and twenty-five dollars ($25.00) for the plans. No refunds will be made. All bids must be based upon the Plans, Specifications, Clarifications, and Addenda.
Bids must be submitted on proposal forms furnished by Montgomery County Commission or copies thereof. All bidders bidding in amounts exceeding that established by the State Licensing Board for General Contractors must be licensed under the provisions of Title 34, Chapter 8, Code of Alabama 1975, and must show evidence of license before bidding or bid will not be received or considered; the bidder shall show evidence by clearly displaying his or her current license on the outside of the sealed envelope in which the proposal is delivered. The Owner reserves the right to reject any or all proposals and to waive technical errors if in the Owner's judgment it is in the best interest of the Owner and will thereby be promoted.
Code of Alabama: Section 39-3-5 Preference to resident contractors in letting of certain public contracts In the letting of public contracts in which any state, county, or municipal funds are utilized, except those contracts funded in whole or in part with funds received from a federal agency , preference shall be given to resident contractors, and a nonresident bidder domiciled in a state having laws granting preference to local contractors shall be awarded Alabama public contracts only on the same basis as the nonresident bidder's state awards contracts to Alabama contractors bidding under similar circumstances; and resident contractors in Alabama, as defined in Section 39-2-12, be they corporate, individuals, or partnerships, are to be granted preference over nonresidents in awarding of contracts in the same manner and to the same extent as provided by the laws of the state of the domicile of the nonresident.

Florence M. Cauthen, Interim County Administrator
Mont. Adv. 1/29, 2/5, 2/12/2020
0004024616

Public Notices

PLANNING COMMISSION
Executive Secretary
Mont. Adv. 02/12, 02/19/2020
0004048481

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