

A) INTRODUCTION

Knox County strives to provide an environment that is free from discrimination based on selected characteristics, also called protected classes. Fair housing and equal opportunity are fundamental principles to creating and sustaining communities in Knox County. The county is an entitlement community under the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant Program (CDBG). In accordance with the Housing and Community Development Act of 1974, as amended, each entitlement community must "affirmatively further fair housing." In order to demonstrate that the entitlement community is "affirmatively furthering fair housing," each community must conduct a Fair Housing Analysis which identifies any impediments to fair housing choice and what steps it will take to affirmatively further fair housing. HUD advises communities that the Analysis of Impediments to Fair Housing should also address the Fair Housing Act, Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Section 109 of Title I of the Housing and Community Development Act of 1974, Title II of the Americans with Disabilities Act of 1990, Architectural Barriers Act of 1968, Age Discrimination Act of 1975, Title IX of the Education Amendments Act of 1972, Executive Order 11063, Executive Order 11246, Executive Order 12892, Executive Order 12898, Executive Order 13166, and Executive Order 13217.

The HUD Fair Housing and Equal Opportunity (FHEO) Office advises Federal entitlement communities to update their Analysis of Impediments (AI) to Fair Housing Choice to coincide with their Five-Year Consolidated Plan, and then every five (5) years thereafter. In addition, each year the communities, as part of its Annual Action Plan, must sign certifications that they will affirmatively further fair housing. This means that Knox County will conduct an Analysis of Impediments to Fair Housing Choice (AI), take appropriate actions to overcome the effects of any impediments identified through the AI, and maintain records reflecting what analysis and corrective actions were taken. The County's 2020 AI coincides with the County's five-year Consolidated Plan

2020-2024 and builds upon previous analyses that were completed in 2005, 2010, and 2015.

The Analysis of Impediments Study to Fair Housing Choice (AI) provides jurisdictions with information related to policies, procedures, and practices in place that impede fair housing choice for all its citizens. The study is a requirement by the U.S. Department of Housing and Urban Development (HUD) to ensure that its entitlement jurisdictions are affirmatively furthering fair housing choice through its federally funded programs and projects.

The basis for this requirement is embedded in the Title VIII of the Civil Rights Act of 1968 recognized as the Federal Fair Housing Act and Fair Housing Amendments Act of 1988

The Federal Fair Housing Act (FHAct). 42 U.S.C. 3601-19, prohibits discrimination in housing practices on the basis of race, color, religion, sex, national origin, familial status, and disability. (FH Act uses the term handicap. however, this document uses the term disability, which has the same legal meaning.) The Act prohibits housing providers from discriminating against persons because of their disability or the disability of anyone associated with them and from treating persons with disabilities less favorably than others because of the disability. The Act also requires housing providers to make reasonable accommodations in rules, policies, practices, or services, when such accommodations may be necessary to afford such person(s) equal opportunity to use and enjoy a dwelling. In addition, the Act requires that housing providers allow tenants to make reasonable modifications to units and common spaces in a dwelling. The Act applies to the vast majority of privately and publicly owned housing including housing subsidized by the federal government or rented through the use of Section 8 voucher assistance. HUD's

regulations implementing the disability discrimination prohibitions of the Act may be found at 24 CFR 100.201-205.

The Fair Housing Act prohibits discrimination based on the following protected classes

- + Race
- + Color
- + National Origin
- + Religion
- + Sex
- + Familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under 18)
- + Disability

Furthermore, the impediments to fair housing choice

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

The AI is a review of **impediments to fair housing choice** in the public and private sector. The study involves:

- A comprehensive review of a State or Entitlement jurisdiction's laws, regulations, and administrative policies, procedures, and practices that affect the approval of sites and other building requirements used in the approval process for the construction of housing
- An assessment of how those laws, etc. affect the location, availability, and accessibility of housing

- An assessment of conditions, both public and private, affecting fair housing choice for all protected classes
- An assessment of the availability of affordable, accessible housing in a range of unit sizes.
- Where there is a determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by HUD regarding assisted housing in a recipient's jurisdiction, an analysis of the actions which could be taken by the recipient to remedy the discriminatory condition, including actions involving the expenditure of funds, and
- The administrative policies concerning community development and housing activities, which affect opportunities of minority households to select housing inside or outside areas of minority concentration.

B) METHODOLOGY

The methodology employed to undertake this AI study includes:

RESEARCH:

- + Examination of mortgage lending trends through the analysis of data available through the Home Mortgage Disclosure Act (HMDA). Enacted by Congress in 1975 and implemented by the Federal Reserve Board's Regulation C, HMDA requires lending institutions to report public loan data. Using the loan data submitted by these financial institutions, the Federal Financial Institutions Examination Council (FFIEC) creates aggregate and disclosure reports for each metropolitan area (MA) that are available to the public at central depositories.
- + Interviews with local government staff and community representatives.
- + A review of source documents, including the most recent AI, conducted in 2015, the 2015-2020 Consolidated Plan, the most recent Tennessee Human Rights Commissions Annual Report, and the most recent Annual Action Plan.
- + A review of the U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy (HUD-CHAS) data.
- + A review of the segregation and income data through CPD Maps. CPD Maps is an online data mapping tool for place-based planning. Grantees and the public can use CPD Maps to analyze and compare housing and economic conditions across their jurisdictions.
- + A review of the most recent demographic and housing data for the City from the U.S. Census.

INTERVIEWS AND MEETINGS:

An important component of the research process for this Analysis of Impediments to Fair Housing Choice involved gathering input regarding fair and affordable housing conditions, perceptions, and needs in Knoxville and

Knox County. The City and County used a variety of approaches to achieve meaningful public engagement with residents and other stakeholders, including public meetings, interviews, and web-based surveys.

- **Public Meeting**

One meeting open to the general public was held to inform the public about and gather information for the Analysis of Impediments to Fair Housing Choice. The meeting began with a short presentation providing an overview of the AI, related fair housing law, how to access HUD-provided fair housing data, and ways to provide input for the study. The remainder of the meetings consisted of an interactive discussion of fair housing, neighborhood conditions, and community resources in Knoxville and Knox County.

Public Meeting

January 21st, 2020

5:00 PM

611 Winona St, Knoxville, TN

A Second public meeting was held to present and gather feedback on the results of the AI study and discuss probable impediments to Fair housing Choice in Knoxville and Knox County. Farmer | Morgan presented the AI data and findings in a presentation format followed by an open discussion about improvements, revisions and ideas that can improve the draft AI. **Further information about the meeting will be added here in the final draft of the document.**

- **Focus Group**

In addition to the public meeting, a focus group was held on February 11th, 2020 at noon at 546 College Street, Knoxville, TN. Knoxville Branch of National Association for the Advancement of Colored People (KNAACP) ensures the political, educational, social, educational and economic equality of rights of all persons and eliminates race-based discrimination. KNAACP organized the group and participants included members of KNAACP, city and county staff.

A flyer explaining the Analysis of Impediments to Fair Housing Choice and related fair housing laws was circulated through the KNAACP email list serve. The discussion included fair and affordable housing needs, neighborhood conditions, and community resources in Knoxville and Knox County.

- **Stakeholder Meetings**

Two stakeholder meetings were also held to disseminate information, gather and obtain valuable community input, and solicit information for the AI study. A questionnaire was also disseminated to obtain information regarding fair housing choice and barriers to affordable housing. Stakeholders were identified by the City of Knoxville and Knox County and represented a variety of viewpoints including fair housing, advocacy for fair housing, community development and planning, employment, housing, homelessness, people with disabilities, seniors, LGBTQ persons, and others. Interview invitations were sent by email and/or phone to more than 80 stakeholders. A large number of people participated in an interview, and several invitees participated in other manners, such as by sharing the community survey and taking the stakeholder survey. Organizations from which one or more representatives participated in the development of this AI include:

- + KNAACP Housing Committee
- + Knoxville Community Development Corporation
- + The Next Step Initiative
- + Chamber of Small Business Development
- + Knox County School Board
- + Knoxville City Council
- + Knox County School Board
- + The Next Step Initiative
- + Centro Hispano
- + Knoxville Leadership Initiative

- + Eastport Neighborhood Watch
- + Burlington Resident Association
- + Catholic Charities
- + Community Action Committee
- + Socially equal energy efficient development (SEED)
- + Home Source East Tennessee
- + Salvation Army
- + East Tennessee Housing Development Corporation (ETHDC)
- + Housing and Urban Development (HUD)
- + McNabb
- + Knoxville Habitat for Humanity
- + Continuum of Care

- **Web based Surveys**

Another method of obtaining community input was a thirty three question web-based survey conducted for City of Knoxville and Knox County. The survey was available in English at <https://www.surveymonkey.com/r/StakeholderSurveyforAI>, The Spanish version was available at <https://www.surveymonkey.com/r/X8R89CH> Hard copies were available at local government offices and public libraries during the months of February and March.

A web based survey for the city and county stakeholders including housing, social service, community development agencies, and advocacy agencies was conducted to solicit information from all the stakeholders and especially for those who could not attend public meetings. Follow-up phone calls and emails were sent to stimulate responses and gather information needed for the AI.

- **Public Comment Period**

The City of Knoxville and Knox County will hold a 30-day public comment period and public hearings to receive input on the draft Analysis of Impediments in April and May 2020. **Further information**

about the comment period, including public comments received, will be included here in the final draft of this document.

- **Publicity of Community Engagement Activities**

A variety of approaches were used to advertise the AI planning process and related participation opportunities to as broad an audience as possible. AI flyer with the survey links along with three paper copies of the survey in English and Spanish were available at the following locations:

- + Knoxville / Knox County CAC, 2247 Western Avenue
- + Lawson McGhee Library, 500 W. Church Avenue
- + Burlington Branch Library, 4614 Asheville Hwy
- + O'Connor Senior Center, 611 Winona Street
- + KCDC Main Office, 901 N. Broadway

Notice was given to residents through a public notice in the Knoxville News Sentinel and the City of Knoxville and Knox County website, through a press release to local news outlets, and through flyers placed in public places. Flyers were also emailed to all stakeholder organizations invited to participate in interviews. In all meeting advertisements, information for anyone needing special accommodations (including translation, interpretation, and services for people with disabilities) was provided.

ANALYSIS OF DATA:

- Low- and moderate-income areas were identified and mapped.
- Concentrations of minority populations were identified and mapped.
- Concentrations of owner-occupied and renter-occupied housing units were identified and mapped.
- Fair Housing awareness in the County was evaluated
- Distribution by location of public and assisted housing units were analyzed and mapped.

- The location of CDBG expenditures throughout City and County were reviewed.

C) JURISDICTIONAL BACKGROUND DATA

The City of Knoxville is the county seat of Knox County. Knoxville is one of the gateways to the Great Smoky Mountains National Park, and the headquarters of several regional and national corporate companies are located within the city. Knoxville is also home to the main campus of the University of Tennessee. Knox County enjoys a central location in East Tennessee Region. The Tennessee River originates near the center of the county from the union of the Holston and French Broad Rivers.

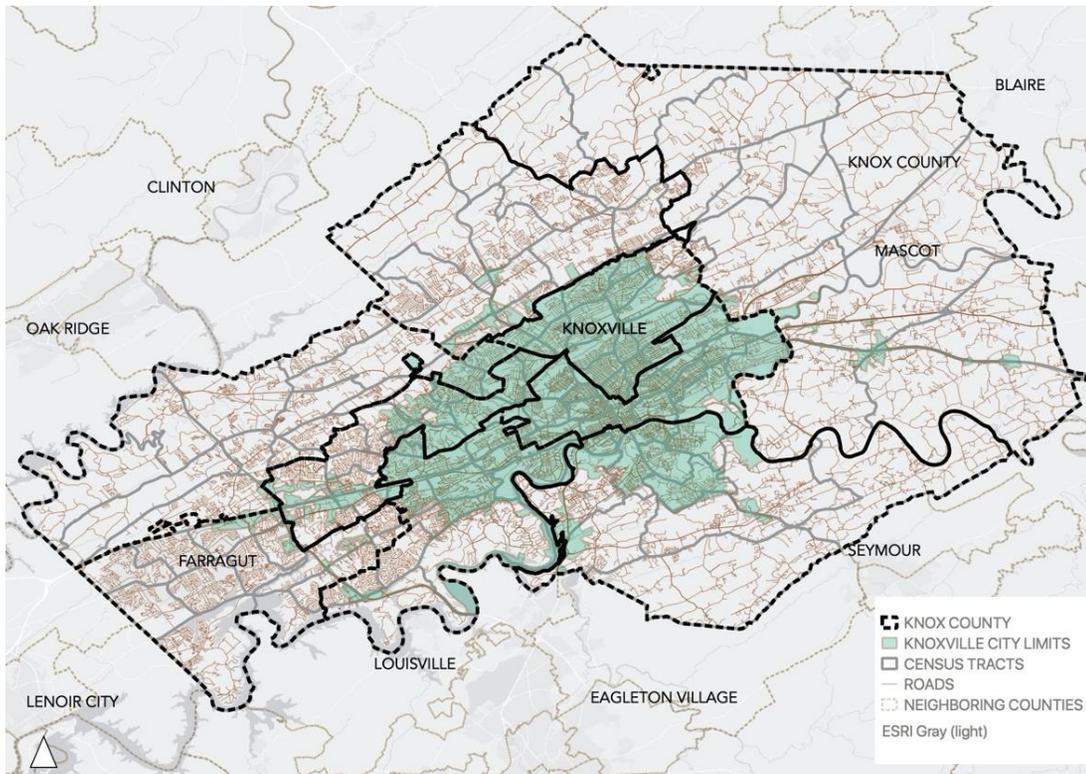
The city and county have a separate mayor and city council, however residents of the county living within the City of Knoxville can vote in both city

and county elections. The City and County both run services efficiently with county overlooking the local school system, health department and library branches while the City of Knoxville maintains the police department (Knox County's website).

1) Population: Age, Gender, Family Type

For the purpose of the study the City of Knoxville and Knox County established a target area that includes city limits and county limits respectively as shown in Map A.

Map A: CDBG Target Area Boundaries



The population trends for the City and County show the growing population and Table 1.1 elucidates this further. The population in City of Knoxville has increased steadily over the past decade at a rate of nearly **4%** from nearly 178,874 in 2010 to 185,429 in 2018. However, the population in Knox County has increased at a rate of **5%** from 2010 to 2018. Although, Knox County’s population trends are a bit concerning, since the population increased by 12% between 2000 and 2010 and only 5% between 2010 and 2018.

Table 1.1 Population Trends in the City of Knoxville and Knox County

Area	2000	2010	2018
City of Knoxville, TN	173,890	178,874	185,429
Knox County, TN	382,032	432,226	456,185

Source: Decennial Census 2000, Decennial Census 2010, ACS 2014-2018

Table 1.2 Population Change in City and County

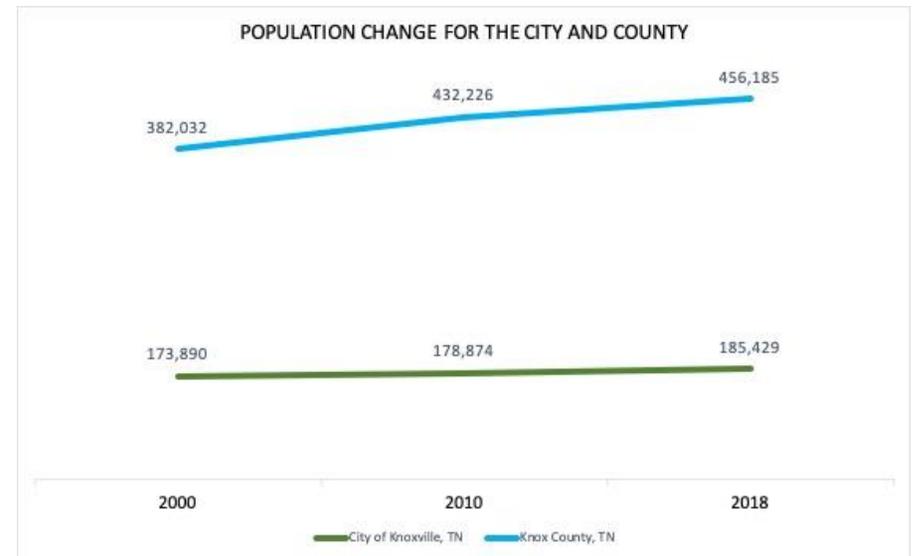
Area	Population Change (2010 to 2018)	% Change
City of Knoxville, TN	6,555	4%
Knox County, TN	23,959	5%

Source: Decennial Census 2000, Decennial Census 2010, ACS 2014-2018

AGE

The age trends (Table 1.4) for population as provided by HUD suggest that age group “Under 18” is decreasing for the entire region. On the other hand, age group “18-64” is increasing in the City of Knoxville and decreasing in the County very slowly. Additionally, the age group “65+” is only decreasing for the City of Knoxville which suggests that either the death rate is increasing for the City or people in the “65+” age groups are moving out into the County and the region. The median age for City of Knoxville is 32.6 years and for the County is 37.4 years. Furthermore, it also indicates that the working age population prefers to raise their children in the city and retirees prefer to live in the County.

Graph 1.1 Population Change in City and County



Source: Decennial Census 2000, Decennial Census 2010, ACS 2014-2018

GENDER

In terms of gender there are more females in the jurisdictions and the region as compared to the percentage of males. The percentage of females is about 51% throughout. However, population trends for the City of Knoxville suggest that the percentage of females is decreasing and there is a rise in the male population for the city. The county and the region seem to have a stable rate of growth for male and female population.

FAMILY TYPE

Families with children in Knoxville City are steady at around 42% while in Knox County the percentage of families with children have gone down by 4% from 1990 to the current year of HUD data. Similarly, for the Knoxville region families with children have gone down, this trend resonates with the national trend of predilection towards single person households and married couples

choosing to remain a family of just two. Poverty is another reason why people may choose not to plan for children.

Table 1.3 Population Characteristics

	(Knoxville, TN CDBG, HOME) Jurisdiction				(Knox County, TN CDBG, HOME) Jurisdiction				(Knoxville, TN) Region			
Sex	#		%		#		%		#		%	
Male	86,147	48.16%			114,079	48.92%			409,186	48.85%		
Female	92,727	51.84%			119,110	51.08%			428,385	51.15%		
Age	#		%		#		%		#		%	
Under 18	34,760	19.43%			54,615	23.42%			182,666	21.81%		
18-64	121,944	68.17%			147,363	63.19%			528,808	63.14%		
65+	22,170	12.39%			31,211	13.38%			126,097	15.06%		
Family Type	#		%		#		%		#		%	
Families with children	16,783	42.37%			27,690	42.48%			89,742	39.85%		

Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T) Table1, Version AFFHT0004

Table 1.4 Population Trends

	(Knoxville, TN CDBG, HOME) Jurisdiction								(Knox County, TN CDBG, HOME) Jurisdiction								(Knoxville, TN) Region							
Sex	1990 Trend		2000 Trend		2010 Trend		Current		1990 Trend		2000 Trend		2010 Trend		Current		1990 Trend		2000 Trend		2010 Trend		Current	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Male	78,267	46.60%	81,974	47.73%	86,147	48.16%	86,147	48.16%	76,047	48.72%	94,373	48.85%	114,079	48.92%	114,079	48.92%	312,945	48.02%	363,181	48.54%	409,186	48.85%	409,186	48.85%
Female	89,673	53.40%	89,780	52.27%	92,727	51.84%	92,727	51.84%	80,046	51.28%	98,814	51.15%	119,110	51.08%	119,110	51.08%	338,696	51.98%	385,070	51.46%	428,385	51.15%	428,385	51.15%
Age	1990 Trend		2000 Trend		2010 Trend		Current		1990 Trend		2000 Trend		2010 Trend		Current		1990 Trend		2000 Trend		2010 Trend		Current	
Under 18	33,819	20.14%	35,673	20.77%	34,760	19.43%	34,760	19.43%	37,959	24.32%	47,673	24.68%	54,615	23.42%	54,615	23.42%	150,799	23.14%	174,029	23.26%	182,666	21.81%	182,666	21.81%
18-64	108,692	64.72%	112,070	65.25%	121,944	68.17%	121,944	68.17%	101,742	65.18%	123,135	63.74%	147,363	63.19%	147,363	63.19%	412,554	63.31%	471,684	63.04%	528,808	63.14%	528,808	63.14%
65+	25,429	15.14%	24,011	13.98%	22,170	12.39%	22,170	12.39%	16,392	10.50%	22,380	11.58%	31,211	13.38%	31,211	13.38%	88,288	13.55%	102,538	13.70%	126,097	15.06%	126,097	15.06%
Family Type	1990 Trend		2000 Trend		2010 Trend		Current		1990 Trend		2000 Trend		2010 Trend		Current		1990 Trend		2000 Trend		2010 Trend		Current	
Families with children	17,847	42.30%	12,809	43.51%	16,783	42.37%	16,783	42.37%	21,140	46.22%	12,439	43.93%	27,690	42.48%	27,690	42.48%	82,080	44.54%	54,864	42.83%	89,742	39.85%	89,742	39.85%

Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T) Table1, Version AFFHT0004

Table 1.5 Age by Cohorts

AGE	KNOXVILLE	KNOX COUNTY
Under 5 years	10,612	26,263
5 to 9 years	10,445	27,327
10 to 14 years	8,526	26,557
15 to 19 years	13,662	30,435
20 to 24 years	25,304	40,971
25 to 34 years	29,913	60,807
35 to 44 years	21,111	56,630
45 to 54 years	21,270	59,932
55 to 59 years	10,182	29,678
60 to 64 years	9,128	26,889
65 to 74 years	13,889	39,092
75 to 84 years	6,758	19,644
85 years and over	3,665	8,061
TOTAL 65 years and over	24,312	66,797

Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates

2) Race

Table 2.1 suggests that White, Non-Hispanics are the dominant race in both the jurisdiction and region. All other races: Black, Hispanic, Asian or Pacific Islander, and Native Americans are under 5% in Knox County and the region. While in the City of Knoxville the percentage of African Americans increases to 16.71%. There are only 25,765 Hispanics in the region of which 8,100 reside in the City of Knoxville forming about 4.53% of the total population making it the third most prevalent race in the City of Knoxville.

Table 2.2 indicates that the Hispanic population increased from 0.66% in 1990 to 4.53% in 2010 for the City of Knoxville. Similar trends of this slight increase in the number of Hispanic populations can be seen in the County as well as the region. Similar trends of slight increase in the number of Hispanic populations can be seen in the County as well as the region. African

American, Hispanic, Asian or Pacific Islander, and Native Americans have increased in numbers from 1990 to 2010 for both jurisdictions and the region. As per the current trend reported on the Affirmatively Furthering Fair Housing Mapping and Data tool provided by HUD White, Non-Hispanic are decreasing in numbers from 82.60% in 1990 to 74.6% in 2010. A decrease of about 6% in the White, Non-Hispanic populations can be seen county-wide and regionally.

Table 2.1 Race/Ethnicity Trends for Jurisdictions and Region

Race/Ethnicity	City of Knoxville, (CDBG, HOME)		Knox County, TN (CDBG, HOME)		Knoxville, TN Region	
	Number	Percent	Number	Percent	Number	Percent
White, Non-Hispanic	133,196	74.46%	211,573	90.73%	738,922	88.22%
Black, Non-Hispanic	29,887	16.71%	7,345	3.15%	46,768	5.58%
Hispanic	8,100	4.53%	6,396	2.74%	25,765	3.08%
Asian or Pacific Islander, Non-Hispanic	3,037	1.70%	4,119	1.77%	10,775	1.29%
Native American, Non-Hispanic	501	0.28%	488	0.21%	2,118	0.25%
Two or More Races, Non-Hispanic	3,847	2.15%	3,037	1.30%	12,416	1.48%
Other, Non-Hispanic	308	0.17%	231	0.10%	807	0.10%

Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T) Table1, Version AFFHT0004

Segregation/Integration Analysis

Table 2.3 shows the racial/ethnic dissimilarity index. Dissimilarity index measures the degree to which two groups are evenly distributed across a geographic area and is a commonly used tool for assessing residential segregation between two groups. This dissimilarity index provides values ranging from 0 to 100, where higher numbers indicate a higher degree of segregation among the two groups measured. Generally, dissimilarity index values between 0 and 39 generally indicate low segregation, values between 40 and 54 generally indicate moderate segregation, and values between 55 and 100 generally indicate a high level of segregation.

The City: As demonstrated in Table 2.3 the Non-White/White index is high for the City of Knoxville and indicates a high degree of separation between white individuals and individuals of color in 1990. However, it is important to note that the index shows a decrease since 1990 and in 2010 the segregation seems low. The Black/White index indicates a high degree of separation between white individuals and African Americans in 1990, and it still seems to be moderate with 48.52 in 2010. The index also suggests that the current year of reporting predicts a rise in the level of segregation for the Black/White dissimilarity index in the city. However, unlike the decrease in the non-White/White dissimilarity index since 1990, the Hispanic/White shows a decrease from 1990 to 2000 but from 2000 to 2010 it seems to be increasing. Although the level of segregation is still low, it needs to be monitored as current data is showing an increase too. Additionally, this trend of segregation between White and Hispanics seems to be mirrored across all

jurisdictions and even the region. Like the White/White dissimilarity index that has dropped since 1990, similarly Asian or Pacific Islander/White dissimilarity index has also gone down from a moderate level of separation to a low level of separation.

The County: The segregation levels are low for Non-White/White, and Black/White for Knox County. However, the level of segregation was moderate between Asian or Pacific Islander and White in 1990's and has since dropped in the County to be presently considered a low level of segregation. In the Knoxville region the Dissimilarity index remains moderate for Asian or Pacific Islander and White, and the trends suggest that segregation levels are decreasing for both the County and region.

Table 2.2 Race/Ethnicity Trends for Jurisdictions and Region

Race/Ethnicity	(Knoxville, TN CDBG, HOME) Jurisdiction								(Knox County, TN CDBG, HOME) Jurisdiction								(Knoxville, TN) Region							
	1990 Trend		2000 Trend		2010 Trend		Current		1990 Trend		2000 Trend		2010 Trend		Current		1990 Trend		2000 Trend		2010 Trend		Current	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
White, Non-Hispanic	138,564	82.60%	135,919	79.12%	133,196	74.46%	133,196	74.46%	150,249	96.15%	182,179	94.27%	211,573	90.73%	211,573	90.73%	604,486	92.75%	681,590	91.08%	738,922	88.22%	738,922	88.22%
Black, Non-Hispanic	25,875	15.42%	28,541	16.61%	32,278	18.05%	29,887	16.71%	3,366	2.15%	5,353	2.77%	8,610	3.69%	7,345	3.15%	37,274	5.72%	43,275	5.78%	52,506	6.27%	46,768	5.58%
Hispanic	1,099	0.66%	2,621	1.53%	8,100	4.53%	8,100	4.53%	798	0.51%	1,949	1.01%	6,396	2.74%	6,396	2.74%	3,269	0.50%	8,647	1.16%	25,765	3.08%	25,765	3.08%
Asian or Pacific Islander, Non-Hispanic	1,639	0.98%	2,876	1.67%	3,666	2.05%	3,037	1.70%	1,293	0.83%	2,295	1.19%	4,903	2.10%	4,119	1.77%	4,408	0.68%	7,957	1.06%	13,082	1.56%	10,775	1.29%
Native American, Non-Hispanic	357	0.21%	1,191	0.69%	1,273	0.71%	501	0.28%	348	0.22%	1,025	0.53%	1,401	0.60%	488	0.21%	1,535	0.24%	5,214	0.70%	6,247	0.75%	2,118	0.25%

Source: AFFH-T Table 2, Version AFFHT0004

Table 2.3 Race/Ethnicity Dissimilarity Trends for Jurisdictions and Region

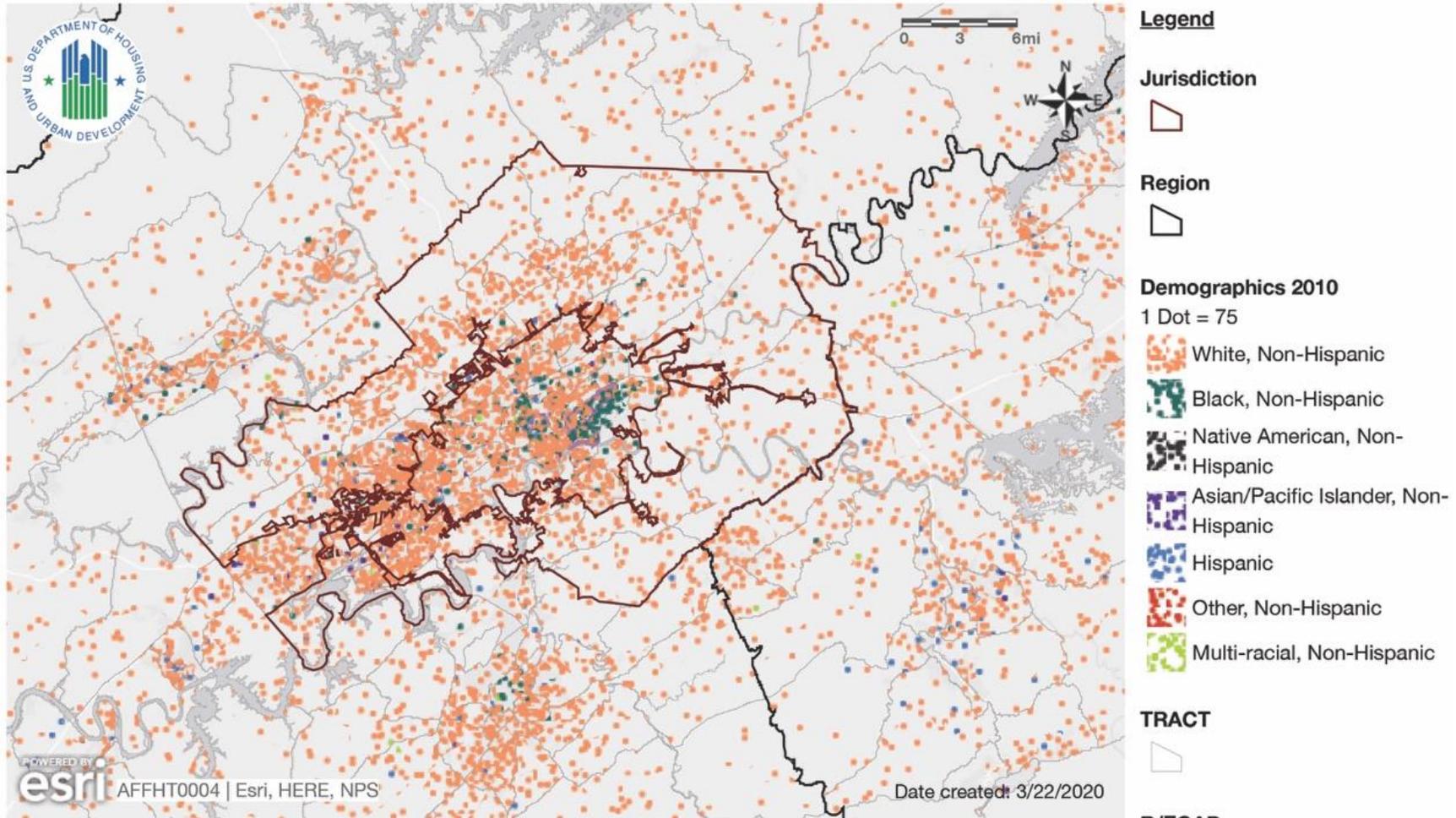
	(Knoxville, TN CDBG, HOME) Jurisdiction Trends				(Knox County, TN CDBG, HOME) Jurisdiction Trends				(Knoxville, TN) Region Trends			
Racial/Ethnic Dissimilarity Index	1990	2000	2010	Current	1990	2000	2010	Current	1990	2000	2010	Current
Non-White/White	59.12	45.62	36.88	40.11	32.32	28.15	24.41	27.39	51.96	42.50	38.44	43.69
Black/White	65.91	55.97	48.52	51.02	35.87	35.17	31.61	35.93	60.32	56.68	52.90	58.00
Hispanic/White	26.26	19.70	26.89	31.60	26.40	20.01	25.32	27.95	27.28	26.13	35.16	38.04
Asian or Pacific Islander/White	50.13	37.42	31.32	38.74	50.89	39.60	37.34	41.15	53.14	43.51	42.07	48.44

Source: AFFH-T Table 3, Version AFFHT0004

Concentration: Despite being predominantly White, the race/ethnicity dot density map (Map 2.1) shows Census Tract (CT) 68.00, CT 20.00, CT 19.00, CT 67.00, and CT 32.00 have concentrations of African American people in the jurisdictions. Hispanics population is low and seem to be spread across central and Western Knoxville. Further, just near city limits on the West and the North an interesting mixing of various racial/ethnic groups is happening with Hispanics and Asian or Pacific Islander, Non-Hispanic are choosing to reside. CT 28.00, CT 45.00 and CT 26.00 seem to be more diverse with a good mix of African American, Hispanic, and Asian/Pacific Islander population.

MAP 2.1 Race and Ethnicity Map for Jurisdictions and Region

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 1 - Race/Ethnicity

Description: Current race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Knox County (CDBG, HOME)

Region: Knoxville, TN

HUD-Provided Data Version: AFFHT0004

Source: AFFH Mapping Tool

3) National Origin

Table 3.1 lists the top ten countries of origin in CDBG jurisdictions and the region. 1.39% of people in the City of Knoxville and 0.90% in Knox County City have reported Mexico as their country of origin, and a large part of them seem to reside in Knoxville. People whose country of origin is India, China (excluding Hong Kong and Taiwan), and Vietnam majorly reside within city limits or on the fringes of city limit. People with a national origin in Canada seem to be the third most common country of origin in the County and the region. Further, the trends from Table 3.2 indicate a general increase in the number of foreign-born people in the CDBG jurisdictions and region.

CT 38.01, CT 46.13, and CT 57.12 are top three CTs whose populations' reported Mexico as their country of origin. CT 45.00, CT 32.00, and CT 57.12 have residents to reported India as their country of origin. CT 57.04, CT 380.1, and CT 45.00 have most people born in China (excluding Hong Kong and Taiwan). Further, CT 58.09, 57.12 and CT 52.32 have the most people who have reported their country of origin as Canada. CT 440.3, and CT 57.04 have most the people who were born in Vietnam. Broadly, CT 38.01, and CT 57.12 are the two CTs most populated with foreign born individuals.

Table 3.1 National Origin

National Origin	(Knoxville, TN CDBG, HOME) Jurisdiction				(Knox County, TN CDBG, HOME) Jurisdiction				(Knoxville, TN) Region			
		#	%		#	%		%	#	%		%
#1 country of origin	Mexico	2,358	1.39%	Mexico	1,977	0.90%	Mexico	8,159	1.03%			
#2 country of origin	India	774	0.46%	India	633	0.29%	India	1,981	0.25%			
#3 country of origin	China excl. Hong Kong & Taiwan	588	0.35%	Canada	555	0.25%	Canada	1,681	0.21%			
#4 country of origin	Vietnam	576	0.34%	Vietnam	435	0.20%	China excl. Hong Kong & Taiwan	1,494	0.19%			
#5 country of origin	Guatemala	481	0.28%	China excl. Hong Kong & Taiwan	359	0.16%	Vietnam	1,314	0.17%			
#6 country of origin	Canada	328	0.19%	Philippines	306	0.14%	Philippines	929	0.12%			
#7 country of origin	Ukraine	249	0.15%	Germany	294	0.13%	Germany	899	0.11%			
#8 country of origin	Korea	238	0.14%	Pakistan	288	0.13%	Korea	802	0.10%			
#9 country of origin	England	188	0.11%	Other UK	271	0.12%	Guatemala	754	0.09%			
#10 country of origin	Philippines	184	0.11%	Korea	270	0.12%	England	620	0.08%			

Source: AFFH-T Table 1, Version AFFHT0004

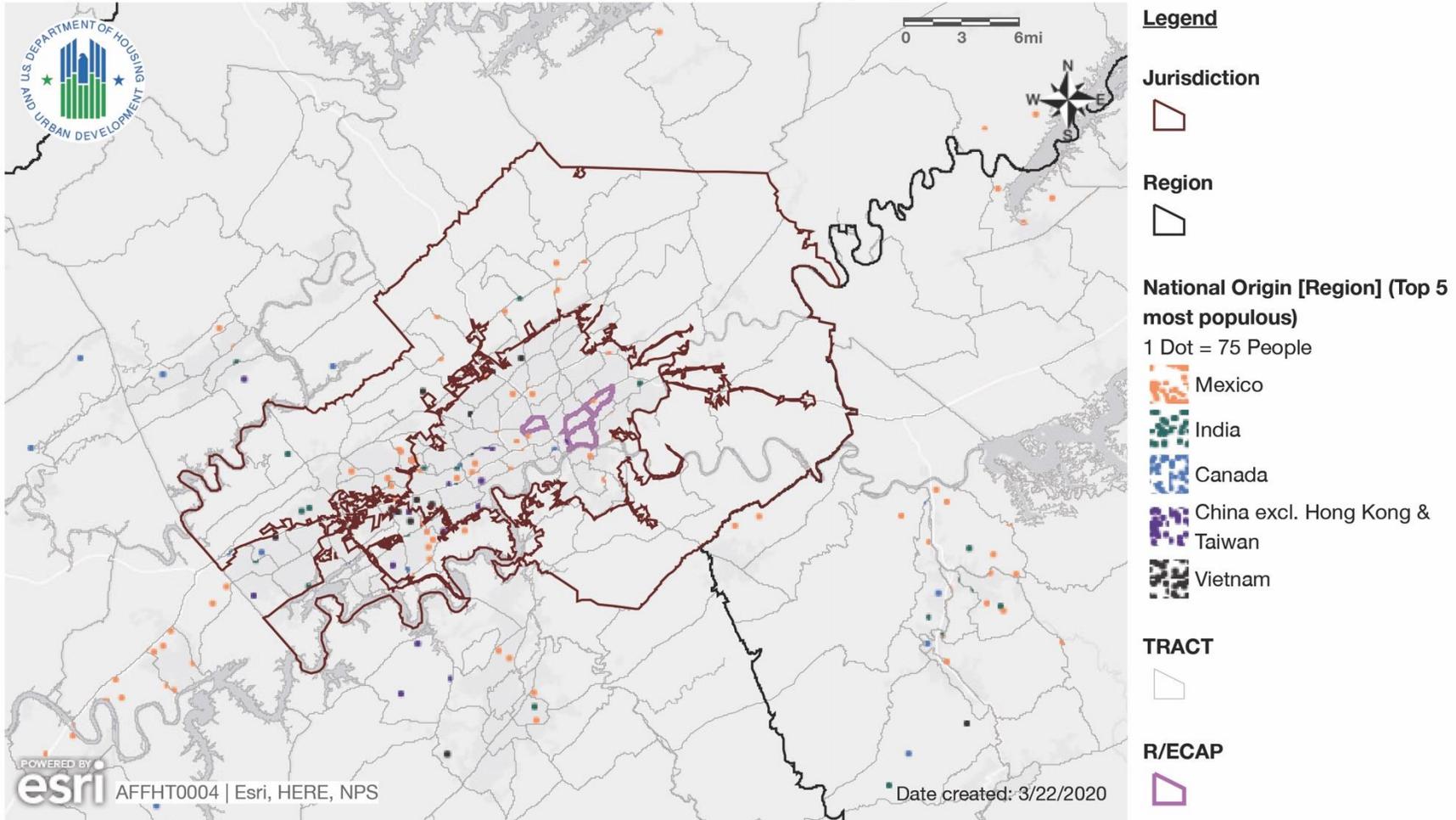
Table 3.2 National Origin Trends

National Origin	(Knoxville, TN CDBG, HOME) Jurisdiction								(Knox County, TN CDBG, HOME) Jurisdiction								(Knoxville, TN) Region							
	1990 Trend		2000 Trend		2010 Trend		Current		1990 Trend		2000 Trend		2010 Trend		Current		1990 Trend		2000 Trend		2010 Trend		Current	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Foreign-born	3,270	0.02%	5,150	0.03%	7,583	0.04%	9,032	0.05%	2,345	0.02%	3,879	0.02%	8,378	0.04%	10,086	0.04%	8,487	0.01%	14,580	0.02%	27,007	0.03%	30,679	0.04%

Source: AFFH-T Table 1, Version AFFHT0004

Map 3.1. National Origin Dot Density Map

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 3 - National Origin

Description: Current national origin (5 most populous) dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Knox County (CDBG, HOME)

Region: Knoxville, TN

HUD-Provided Data Version: AFFHT0004

Source: AFFH Data and Mapping Tool

4) Limited English Proficiency (LEP) Language

Concurrent with data of people born in foreign countries, the limited English proficiency language Table 5.2 indicates an increase in the number of people who are not proficient in the English language from 1990 to the current data point. Both the jurisdiction and the region show languages like Spanish, Chinese, and Vietnamese (Table 5.1) as the primary language for a few people in the CDBG jurisdiction and region which corresponds with people born in Mexico, China, and Vietnam. See Map 3.1 and Map 4.1 for more clarity.

CT 46.10, CT 46.14, and CT 38.01 seems to have the highest concentration of people that speak Spanish and have limited English language proficiency. CT 44.03, CT 49.00, and CT 48.00 have the most concentration of people speaking Vietnamese, and CT 58.64 has the greatest number of Chinese speaking residents. This corresponds with the dot density map displaying people of foreign origin. When compared to the region, the density of people speaking foreign languages is more concentrated in the City of Knoxville, especially on the western side of the jurisdiction at the city limits.

Table 4.1 Limited English Proficiency Language

		(Knoxville, TN CDBG, HOME) Jurisdiction				(Knox County, TN CDBG, HOME) Jurisdiction				(Knoxville, TN) Region			
Limited English Proficiency (LEP) Language		#		%		#		%		#		%	
#1 LEP Language	Spanish	3,036	1.79%	Spanish	2,150	0.97%	Spanish	9,137	1.15%				
#2 LEP Language	Vietnamese	548	0.32%	Vietnamese	329	0.15%	Chinese	1,242	0.16%				
#3 LEP Language	Chinese	488	0.29%	Chinese	292	0.13%	Vietnamese	1,072	0.13%				
#4 LEP Language	Arabic	404	0.24%	Arabic	207	0.09%	Arabic	673	0.08%				
#5 LEP Language	Other Indic Language	166	0.10%	Other Indo-European Language	199	0.09%	Korean	449	0.06%				
#6 LEP Language	Russian	149	0.09%	Other Indic Language	195	0.09%	French	425	0.05%				
#7 LEP Language	Korean	142	0.08%	Tagalog	105	0.05%	Other Indic Language	416	0.05%				
#8 LEP Language	French	134	0.08%	Russian	102	0.05%	Other Indo-European Language	335	0.04%				
#9 LEP Language	Other Asian Language	110	0.06%	Korean	98	0.04%	Japanese	284	0.04%				
#10 LEP Language	Tagalog	72	0.04%	Other Asian Language	93	0.04%	Russian	275	0.03%				

Source: AFFH-T Table 1, Version AFFHT0004

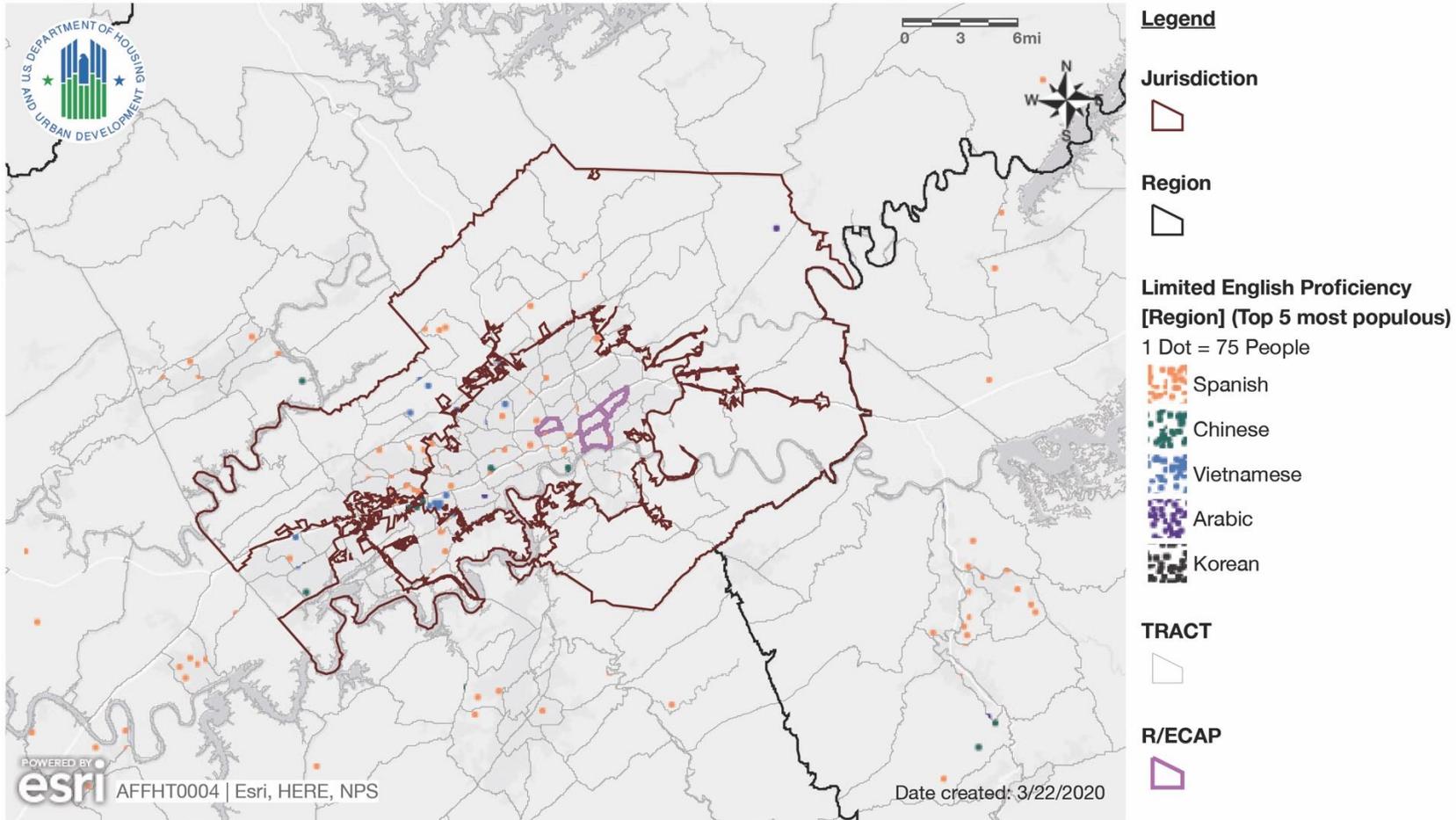
Table 4.2 Limited English Proficiency Language Trend

		(Knoxville, TN CDBG, HOME) Jurisdiction								(Knox County, TN CDBG, HOME) Jurisdiction								(Knoxville, TN) Region							
LEP		1990 Trend		2000 Trend		2010 Trend		Current		1990 Trend		2000 Trend		2010 Trend		Current		1990 Trend		2000 Trend		2010 Trend		Current	
		#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Limited English Proficiency		2,165	1.29%	2,931	1.71%	4,701	2.63%	5,792	3.24%	1,138	0.73%	1,968	1.02%	4,099	1.76%	4,557	1.95%	5,343	0.82%	8,869	1.19%	15,280	1.82%	16,356	1.95%

Source: AFFH-T Table 1, Version AFFHT0004

Map 4.1. Limited English Proficiency Language Dot Density Map

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 4 - LEP

Description: LEP persons (5 most commonly used languages) for Jurisdiction and Region with R/ECAPs

Jurisdiction: Knox County (CDBG, HOME)

Region: Knoxville, TN

HUD-Provided Data Version: AFFHT0004

Source: AFFH Data and Mapping Tool

5) Disability Type

51,767 people in the City of Knoxville are facing some physical difficulty and 50,704 are suffering from some disability in Knox County. About 14,176 people have an ambulatory difficulty, 211,512 people have cognitive difficulties, 10,276 have independent living difficulty, and 5,838 have some hearing difficulty in the City. It is important to note here that some people could be accounted for more than one disability and could also be duplicated while counting for Knox County as well. However, the concentration of people experiencing difficulties was high in and around the city with access to healthcare being a possible reason. The census tracts that have highest number of people with ambulatory difficulties are CT 49.00, CT 68.00, and CT

21.00. Self-care issues are most prevalent with people residing in CT 49.00, CT 68.00, and CT 57.12. The people who need assistance and can't live independently are high in CT 68.00, CT 49.00, and CT 59.08. Map 5.1 shows the density of people with disabilities in the city and county.

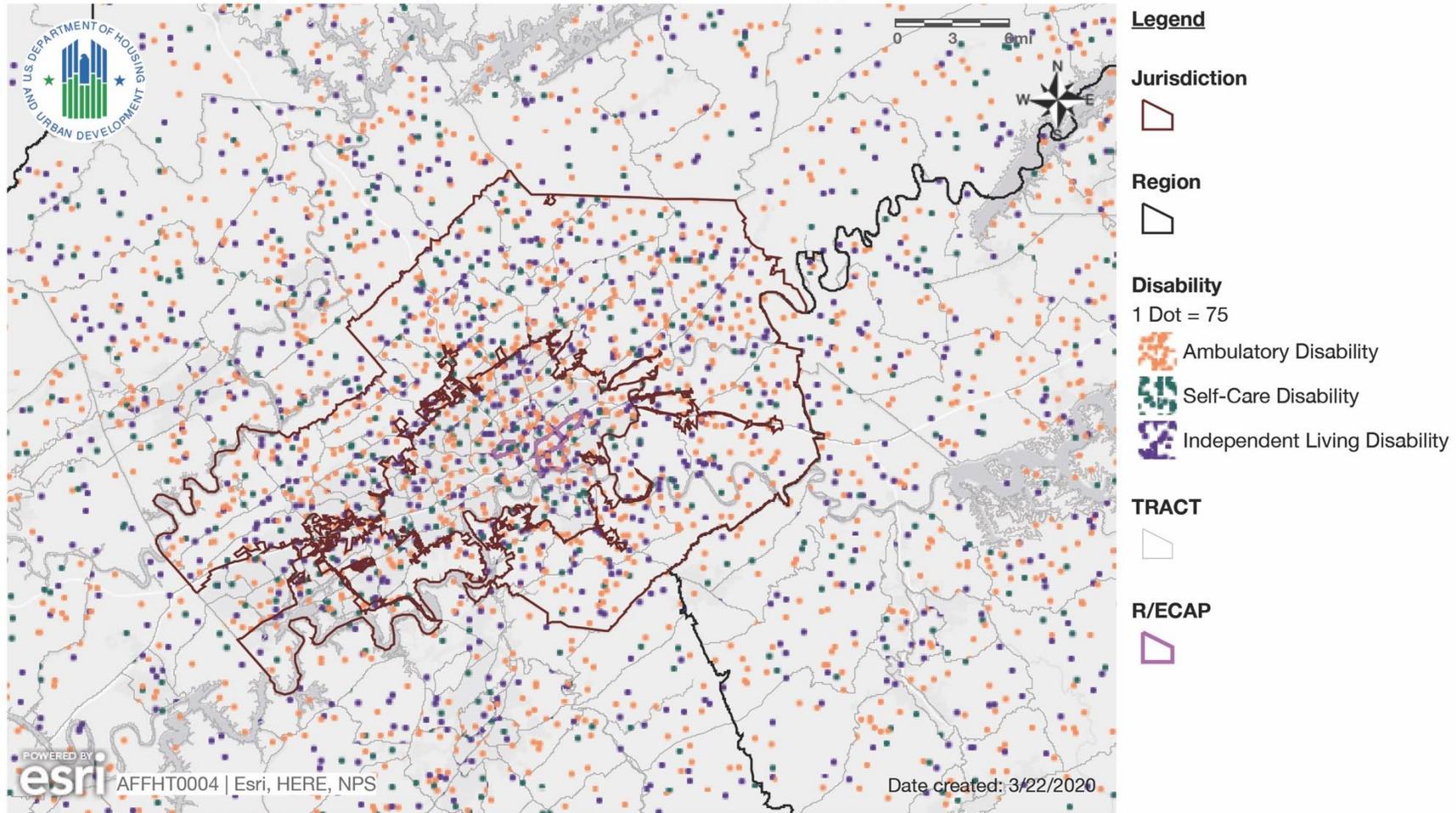
Map 5.2 shows the dot density of people with vision, hearing and cognitive disabilities. The highest number of vision difficulties are found in people residing in CT 57.12, CT 64.01, and CT 68.00. Additionally, CT 49.00, CT 29.00 and CT 68.00 have the highest number of people with cognitive problems and CT 41.00, CT 64.02, and CT 51.00 have the highest number of residents with hearing difficulties.

Table 5.1 Disability Type

Disability Type	(Knoxville, TN CDBG, HOME) Jurisdiction		(Knox County, TN CDBG, HOME) Jurisdiction		(Knoxville, TN) Region	
	#	%	#	%	#	%
Hearing difficulty	5,838	3.47%	7,080	3.23%	35,869	4.57%
Vision difficulty	4,633	2.75%	4,302	1.96%	22,221	2.83%
Cognitive difficulty	11,512	6.84%	9,740	4.44%	51,623	6.57%
Ambulatory difficulty	14,176	8.43%	14,176	6.46%	71,711	9.13%
Self-care difficulty	5,332	3.17%	5,376	2.45%	26,849	3.42%
Independent living difficulty	10,276	6.11%	10,030	4.57%	49,756	6.34%

Source: AFFH-T Table 2, Version AFFHT0004

Map 5.1. Dot Density Map population of persons with ambulatory, self-care, and independent living disabilities
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 14 - Disability by Type

Description: Dot density map of the population of persons with disabilities by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction and Region

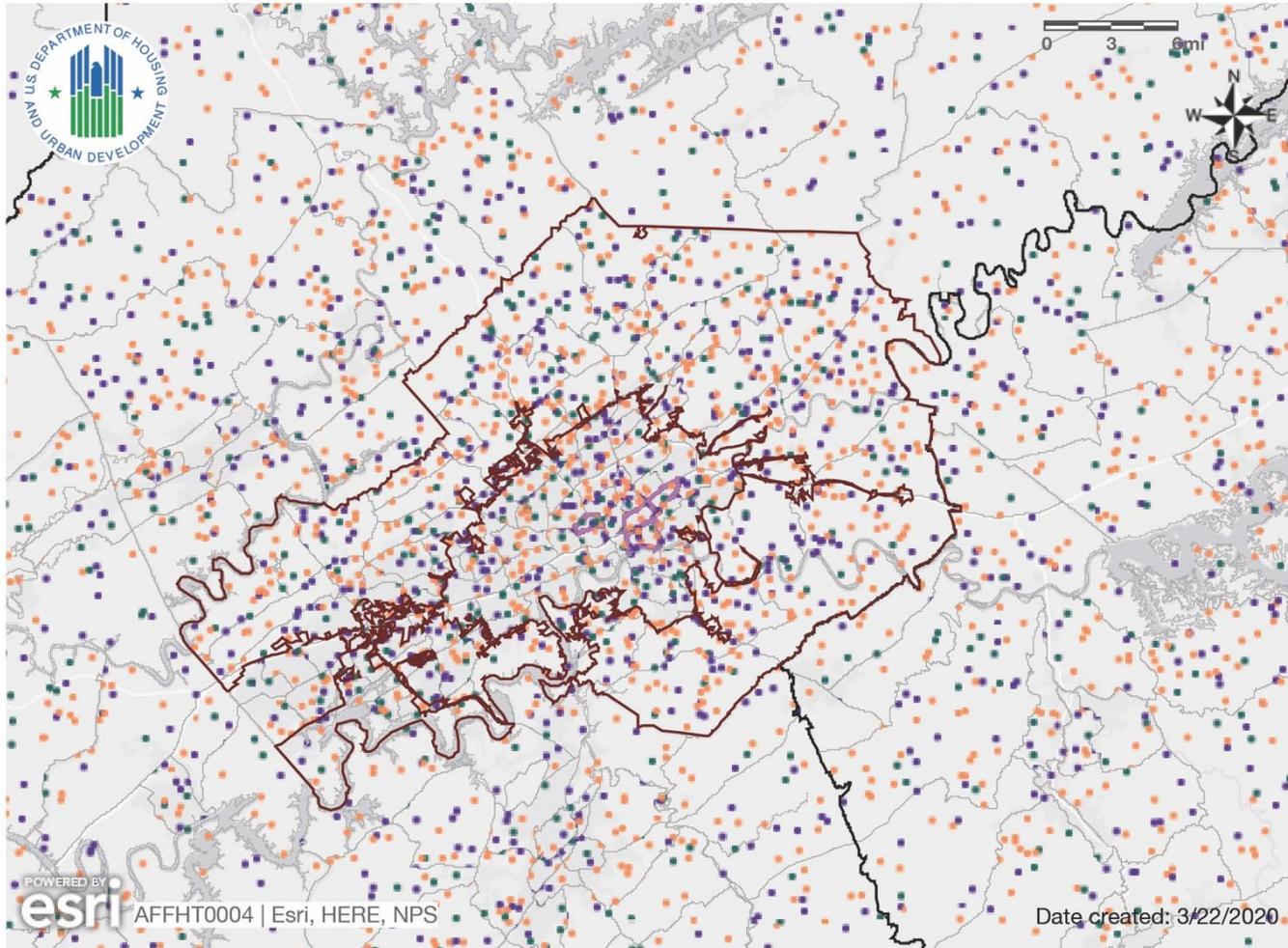
Jurisdiction: Knox County (CDBG, HOME)

Region: Knoxville, TN

HUD-Provided Data Version: AFFHT0004

Source: AFFH Data and Mapping Tool

Map 5.2. Dot Density Map Showing population of persons with vision, hearing and cognitive disabilities
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Legend

Jurisdiction



Region



Disability

1 Dot = 75



Ambulatory Disability



Self-Care Disability



Independent Living Disability

TRACT



R/ECAP



Name: Map 14 - Disability by Type

Description: Dot density map of the population of persons with disabilities by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction and Region

Jurisdiction: Knox County (CDBG, HOME)

Region: Knoxville, TN

HUD-Provided Data Version: AFFHT0004

Source: AFFH Data and Mapping Tool

6) Employment

According to the recent ACS (2011-2015) and HUD populated data, over 90% of the population 16 years and over is in the labor force. The rate of unemployment in the ages of 16-24 is 15.74% while rate of unemployment in ages 25-64 years is only 3.95%. The US Department of Labor's Economic Summary for Knoxville Region published March 05, 2020 reports a 3.4% national unemployment rate for the month of December 2019. Further, it finds that the unemployment rate for Knox County is only 2.5%.

The prevalent occupation of the civilian employed population 16 years and over is the "Educational services, and health care and social assistance" category with nearly 16,268 people employed in this sector followed by 14,021 workers in the "retail trade" business. The third sector that employs most people in Knox County is the "Arts, Entertainment, Accommodations" as shown in Table 6.2. Further, top employers reported by the East Tennessee

Economic Development Agency's list of largest employers, updated in 2020, are shown in Table 6.3. The Economic Development Agency elucidates the above findings as 9,384 employees work for The University of Tennessee that reside in Knoxville. With 8,082 residents working in the public education system, Knox County Schools employs about 8,082 workers. Additionally, Covenant Health, Wal-mart Stores, Inc. and Clayton Homes are also big regional employers that employ Knox County residents.

Table 6.1 Employment Status for the Civilians Employed Population 16 years and over

Total Population in the Civilian Labor Force	125,363
Civilian Employed Population 16 years and over	118,095
Unemployment Rate	5.75
Unemployment Rate for Ages 16-24	15.74
Unemployment Rate for Ages 25-65	3.95

Source: ACS 2011-2015

Table 6.2 Occupations for the Civilians Employed Population 16 years and over

Business by Sector in Knox County	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	287	245	0	1	0
Arts, Entertainment, Accommodations	11,840	4,363	13	9	-4
Construction	4,343	3,599	5	7	3
Education and Health Care Services	16,268	6,241	17	13	-5
Finance, Insurance, and Real Estate	5,909	2,185	6	4	-2
Information	2,345	871	2	2	-1
Manufacturing	8,872	7,390	9	15	6
Other Services	2,861	1,954	3	4	1
Professional, Scientific, Management Services	10,084	4,367	11	9	-2
Public Administration	0	0	0	0	0
Retail Trade	14,021	4,246	15	9	-6
Transportation and Warehousing	3,808	3,143	4	6	2
Wholesale Trade	5,540	3,953	6	8	2
Total	86,178	42,557	--	--	--

Source: ACS 2011-2015, ACS (Workers), 2015 Longitudinal Employer-Household Dynamics (Jobs)

The largest negative values in the Jobless Workers column in Table 6.2, are within the Retail Trade; Education and Health Care Services; and Arts, Entertainment, and Accommodations sectors. This indicates that large commuter populations travel from Knox County for these jobs. This is supported by Table 6.5 below, indicating 15% of the workforce works outside the county. Additionally, ACS suggests that 25% of the workforce has a commute time between 30 and 60 minutes which further validates that workers travel outside for work as shown in Table 6.6.

Access to work and home form the major commute for any city or any region. Fair means of transportation and the ability of a county to provide access to

all is crucial. Knox County Community Action Committee (CAC) Transit provides accessible, demand response public transportation services to Knox County residents who live outside Knoxville city limits and to residents residing in areas in Knoxville that are not covered by Knoxville Area Transit (KAT) Transit. CAC Transit is available for \$2 per ride and rides can be scheduled a day before the planned trip. Knoxville is served by their own transportation system called KAT which serves 23 fixed routes and covers over 1,100 bus stops. Additionally, Knoxville also has a free trolley line that serves the downtown and university area.

Table 6.3 Top Employers

Company	Total Employees	Description
The University of Tennessee - Knoxville	9,384	State university
Knox County Schools	8,082	Public education system
University of Tennessee Medical Center (UHS)	5,458	Health care system
State of Tennessee - Regional Offices	3,286	State administrative offices
City of Knoxville	2,644	Municipal government
Knox County Government	2,500	County government
East Tennessee Children's Hospital	1,847	Area children's hospital
CVS Caremark Corp.	1,594	Drugstores and pharmaceutical distribution
Copper Cellar Corp.	1,540	Full-service restaurants
Brothers Management	1,500	McDonald's franchise
Elavon	1,476	Electronic payment, processing service center
United Parcel Service (UPS)	1,450	Shipping and delivery operation
Tennessee Valley Authority (TVA)	1,326	Regional power authority & development agency
Knoxville Utilities Board (KUB)	1,106	Local utilities provider
U.S. Postal Service	1,060	Mail service
Broadway Electric Service	1,047	Construction - electrical contractor
Pellissippi State Technical Community College	1,019	Two-year technical community college.

Source: East Tennessee Economic Development Agency's list of largest employers, updated in 2020.

Table 6.4 indicates that only 0.70% of the population over 16 years that go to work choose public transportation as an option, 1.80% walk, only 0.30% bike and 7.7% carpool in a car, van or truck. While 83.90% drive alone in a car, truck, or van as a means to commute to work. The mean travel time was reported to be 21 minutes as reported in ACS 2013-2017. Additionally, 15.30 % of the people worked outside their county of residence and 1.0% also worked outside the state of residence (Table 6.5). Despite availability of public transit, calling one day ahead of a trip makes this option less convenient to use for day-to day commutes. The County and City have proposed energy efficient zoning codes and the average car ownership of two cars per household seem to be going against their sustainability goals. For a city that wants to reduce carbon footprint and bring about energy efficiency. A robust and integrated transportation system should be invested in. Additionally, there seems to be a disconnect between affordable housing locations and transit service areas which implies that better integration is needed.

Table 6.4 Means of Transportation to work for Knox County

Subject	Percentage
Car, truck, or van - drove alone	83.90
Car, truck, or van - car pooled	7.7
Public transportation	0.70
Walked	1.8
Bicycle	0.3
Taxicab, motorcycle, or other means	0.7
Worked at home	4.9

Source: ACS 2013-2017

Table 6.5 Place of Work for Knox County

Subject	Total
Worked in state of residence	99.0
Worked in county of residence	83.7
Worked outside county of residence	15.3
Worked outside state of residence	1.0

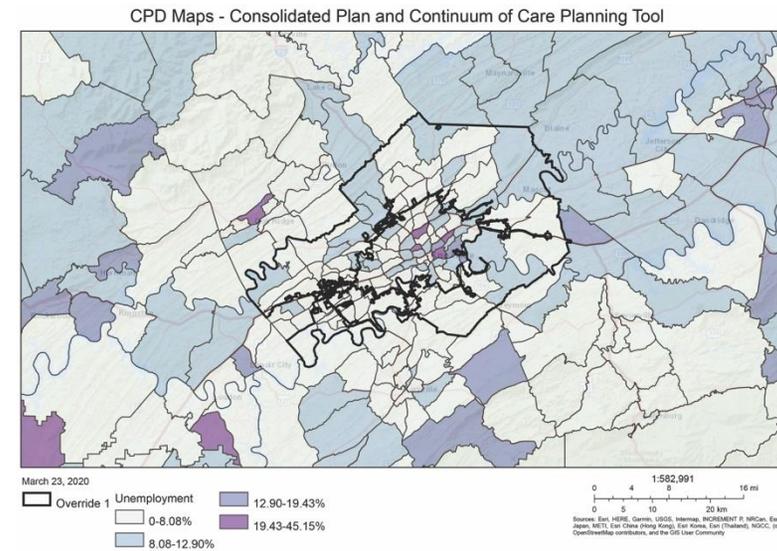
Source: ACS 2013-2017

Table 6.6 Travel Time for Knox County Workers

Travel Time	Number	Percentage
< 30 Minutes	79,508	72%
30-59 Minutes	27,753	25%
60 or More Minutes	3,615	3%
Total	110,876	100%

Source: ACS 2011-2015

Map 6.1 Map showing employment for Knox County and Knoxville,



Source: Continuum of Care Planning Tool

Unemployment: Knox County’s unemployment rate is 3.2% as reported by the Bureau of Labor Statistics. The census tracts that have higher concentration of unemployed people are CT 1900, CT 6800, CT 1400, and CT 2900. These areas also suffer from high host burden as well as a high poverty rate. The median household income in CT 1400 and CT 6800 remain low as well.

7) Income

Households in Knox County have a median household income of \$52,458, which is \$5,194 less than the national median household income. While there are 31,730 households with income in the range of \$50,000 to \$74,999, there are also 23,942 households whose income is less than \$15,000. In 2017, the tract with the highest median household income were CT 57.10, 58.10 and 58.12. ACS, 5-year estimates suggest that 15.8% of the populations for whom the poverty status is determined live below the poverty line. The largest demographic group living in poverty are females in the age group of 18-24, followed by males 18-24, and then females 25-34.

The most common racial or ethnic group living below the poverty line in Knox County is White, followed by African American, and then Hispanics with 49,887, 13,806, and 5,110 people respectively. Poverty rate is high in census tracts within in Knoxville city limits, with Census tracts 19.00, 68.00, 09.02, 14.00, 09.02, 69.00, 26.00 having a poverty rate of more than 50% (see map 7.1). Of these CT 69.00 and CT 14.00 are especially concerning with poverty rates of 70.31% and 67.87%, respectively. CT 14.00 has a housing cost burden

of 50.43%, an unemployment rate of 22.97%, and the median household income in this census tract is \$10,164. Further, CT 69.00 has a housing cost burden of 64.45%, an unemployment rate of 4.89%, and the median household income in this census tract is \$11,754. These conditions with the prevalent poverty rate indicate that these areas need immediate attention and resources.

U.S. Department of Housing and Urban Development’s (HUD) income limits in Table 7.1 show the median family income as well as HUD income limit categories-low, very low, and extremely low-income limits. HUD uses its own measure for calculating the median family income for each jurisdiction called HUD Area Median Family Income (HAFMI), that allows HUD to determine Fair Market Rents and income limits for its various housing programs. To qualify for HUD programs, a household would make less than 80% of the area median income. Extremely low-income limits in the Knoxville HUD Metro Area with four persons in the household would have an annual income of \$25,750. Approximately, 34.70% of the total families (that reported income) in Knox County are considered to be low-income, and around 15% families are extremely low-income. According to HUD Income limit categories, Map 7.2 shows households with extremely low income. These seem to be concentrated in census tracts 67.00, 68.00, 69.00, 14.00, and 09.02. While Low Mod Census Block Groups indicate the levels of low and moderate income are concentrated mostly within Knoxville and northern and eastern parts of the county.

Table 7.1 HUD Income Limit Categories (Metro FMR Area is made up of Anderson County, Blount County, Knox County, Loudon County, and Union County)

	Median Family Income	FY 2019 Income Limit Category	Persons in Family							
			1	2	3	4	5	6	7	8
Knoxville, TN HUD Metro FMR Area	\$69,900	Very Low (50%) Income Limits	24,500	28,000	31,500	34,950	37,750	40,550	43,350	46,150
		Extremely Low-Income Limits (30% Income)	14,700	16,910	21,330	25,750	30,170	34,590	39,010	43,430
		Low (80%) Income Limits	39,150	44,750	50,350	55,900	60,400	64,850	69,350	73,800

Source: Housing and Urban Development FY 2018, Income Limits Documentation System

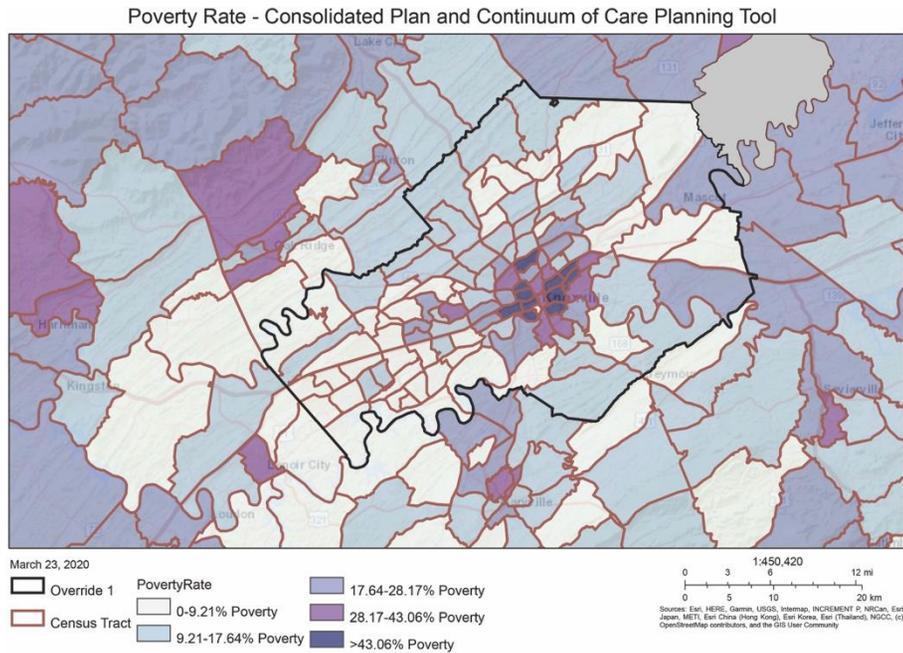
Table 7.2 Income and Benefits

Income and benefits (in 2017 inflation adjusted dollars)	Number	Percentage
Total households	182,315	
less than \$10,000	14,489	7.9%
\$10,000 to \$14,999	9,453	5.2%
\$15,000 to \$24,999	19,421	10.70%
\$25,000 to \$34,999	19,306	10.60%
\$35,000 to \$44,999	24,634	13.50%
\$50,000 to \$74,999	31,730	17.40%
\$75,000 to \$99,999	22,420	12.30%
\$100,000 to \$149,999	23,230	12.70%
\$150,000 to \$199,999	8,621	4.70%
\$200,000 or more	9,011	4.90%

Source: ACS 2013-2017

Map 7.1 Poverty Rate for Knox County

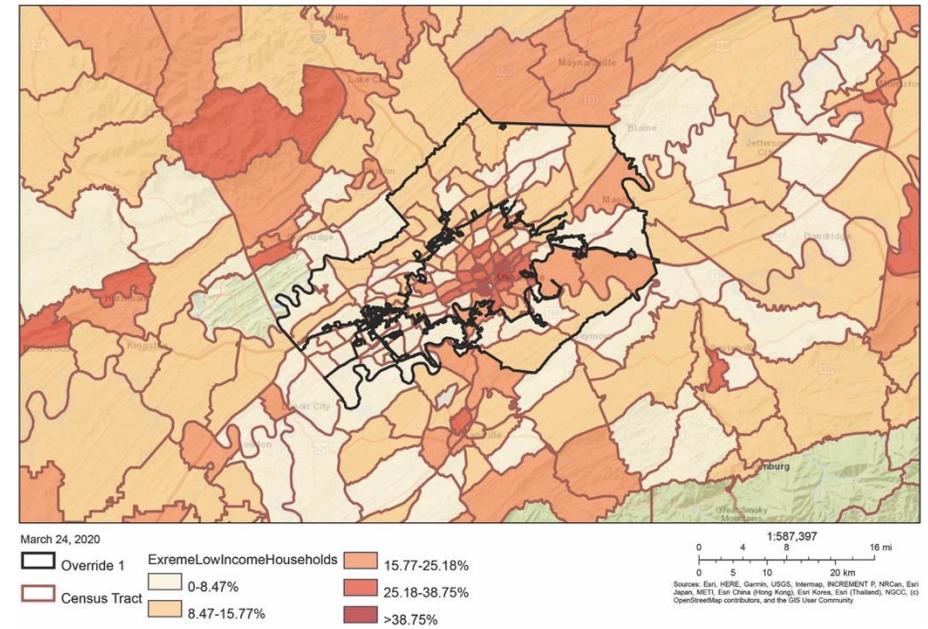
Source: Continuum of Care Planning Tool



Map 7.2 Extremely Low-Income Households in Knox County

Source: Continuum of Care Planning Tool

CPD Maps - Consolidated Plan and Continuum of Care Planning Tool



8) Housing Profile

The City of Knoxville and Knox County currently have 89,223 and 200,608 housing units and the homeowner vacancy rate is 2.4% in the city and 1.9% in the county. The renter vacancy is little higher at about 5% for both the city and county. Similarity can be seen within occupancy and vacancy patterns in the city and county with almost 90% of the housing stock being occupied and almost 10% being vacant (See Table 8.1).

Table 8.1 Housing Characteristics

HOUSING OCCUPANCY	KNOXVILLE	KNOX COUNTY
Total housing units	89,223	200,608
Occupied housing units	79,458	182,315
Vacant housing units	9,765	18,293
Homeowner vacancy rate	2.4	1.9
Rental vacancy rate	5.6	5.5

Source: ACS 2013-2017

As shown in Table 8.2, single-family detached is the most dominant housing type in both city and county with 53.49% and 66% respectively. Multifamily dwellings seem to be the second preferred housing option in both the jurisdictions. In Knox County the number of multi-family developments have seemed to increase from 6% in 2011 to about 13% in 2017.

Table 8.2 Housing units in structures

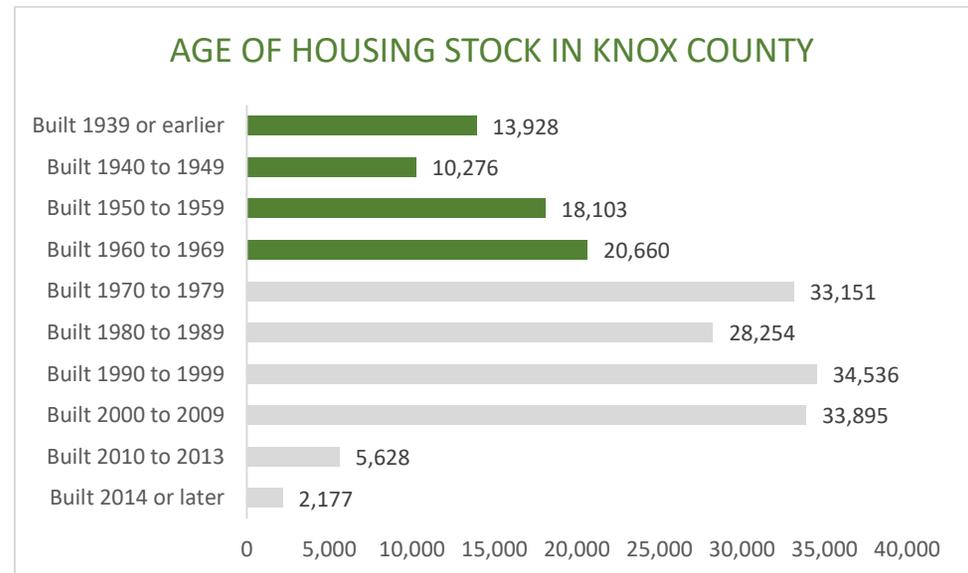
UNITS IN STRUCTURE	KNOXVILLE	KNOX COUNTY
Total housing units	89,223	200,608
1-unit, detached	47,725	132,410
1-unit, attached	4,675	11,815
2 units	2,510	3,545
3 or 4 units	4,395	6,457
5 to 9 units	7,540	10,318
10 to 19 units	10,012	12,949

20 or more units	11,212	13,875
Mobile home	1,111	9,125
Boat, RV, van, etc.	43	114

Source: ACS 2013-2017

Of the housing stock within Knox County, the highest percentage of housing units were built between 1990-1999 at 17.56% followed by 2000-2009 at 16.15%. Chart 8.1 shows that 31.38% of the housing units in the city are over 50 years and older. With such an old housing stock, rehabilitation efforts may be required for the safety and security of the residents. With over 35% of households in Knox County at or below HUD's low-income standards, additional efforts may need to be considered at governmental level for renovating this stock for it to meet the sustainability standards adopted by the zoning code.

Chart 8.1: Age of Housing units in Knox County, TN



Source: ACS 2013-2017

HUD’s housing data shows the number and percentages of owner-occupied and renter-occupied units by the year housing units were built as seen in Table 8.3. In the past thirty years, there has been a larger rise in the buildings that accommodate renter-occupied units than owner-occupied units. Overall, the highest number of units were built between 1950-1979, implying that many of the units could be in need of repairs. They could be below current housing standards, and material and safety compliance could be an issue in these older structures, especially in low-income areas.

Table 8.3 Owner and Rental Details for Housing units in Knox County

Year Unit Built	Owner Occupied		Renter Occupied	
	Number	Percentage	Number	Percentage
2000 or later	18,113	25%	4,805	23%
1980-1999	27,594	39%	8,490	40%
1950-1979	22,100	31%	6,458	31%
Before 1950	3,325	5%	1,284	6%
Total	71,132	100%	21,037	100%

Source: 2011-2015 CHAS

Almost 64% of the housing stock in Knox County is owner occupied, and nearly 36% is renter occupied as seen in Table 8.3. Table 8.4 below shows that the highest percentage of housing value of owner-occupied housing lies in the \$150,000 to \$199,999 category with almost 20.05% housing units in this category. The median housing value for owner occupied housing units is \$169,400 which is \$1,400 less than the state’s median housing value. Further, 62.5% of the homeowners have reported that they are still making mortgage payments. Furthermore, looking at the rate of poverty and median household

income, the housing values still seem high, and it seems that only a small percentage of the population could afford to own a house. Additional assistance may be required for residents from low to moderate income households to purchase a home.

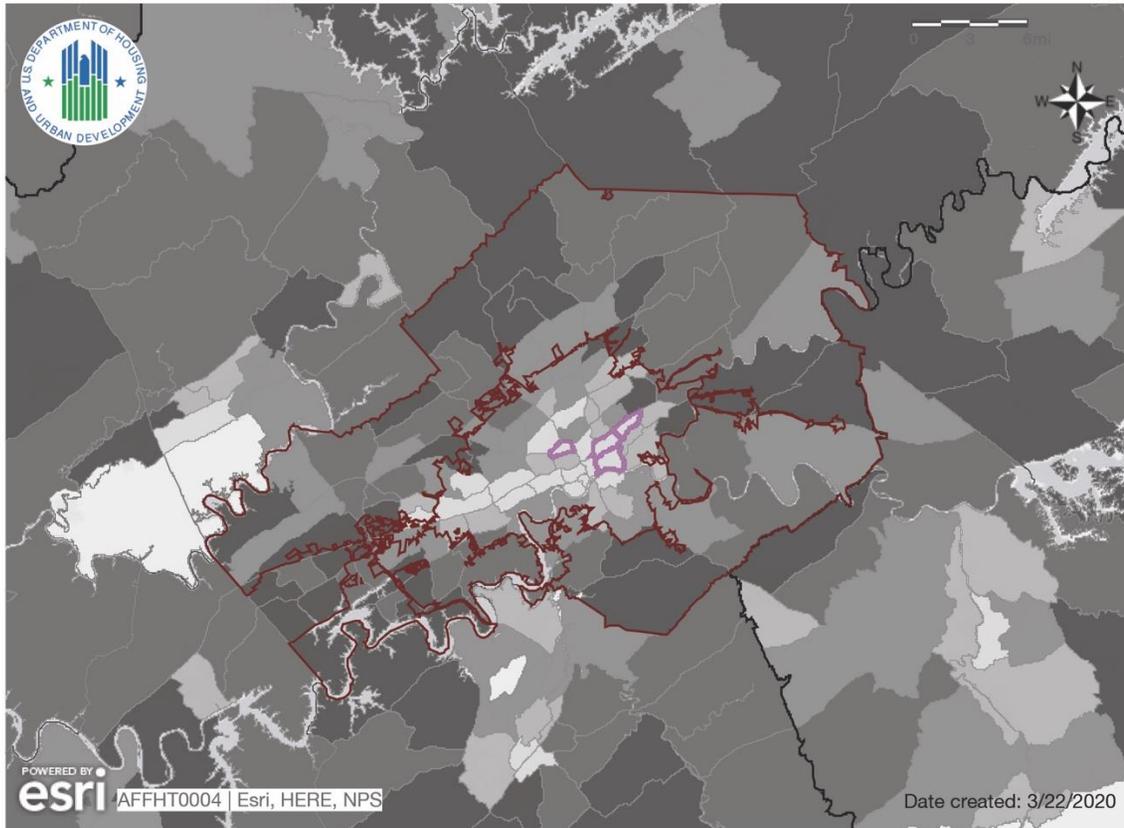
Within the county, the northern, north eastern, southern and south-western parts have high home ownership rates. Within Knoxville city limits, the home ownership rates drop to 45%. Only a few areas in the city, CT 31.00, CT 33.00, CT 46.08 and CT 55.02, show high ownership. In downtown Knoxville, where the extremely low-income households are located, the home ownership rate seems to be really low.

Table 8.4 Housing Values

Housing Value for Owner Occupied Units	Estimate
Less than \$50,000	17,345
\$50,000 to \$99,999	23,297
\$100,000 to \$149,000	23,994
\$150,000 to \$199,999	23,709
\$200,000 to \$299,999	14,503
\$300,000 to \$499,999	5,955
\$500,000 to \$999,999	1,130
\$1,000,000 or more	17,345
Median Housing Value (dollars)	169,400

Source: ACS 2013-2017

Map 8.1 Housing Tenure by Owners in Knox County
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Legend

Jurisdiction



Region



TRACT



R/ECAP



Percent Households who are Owners

< 39.84 %

39.84 % - 57.89 %

57.89 % - 72.25 %

72.25 % - 82.64 %

82.64 % - 100.0 %

Percent Households who are Owners: Data not Available



Name: Map 16 - Housing Tenure

Description: Housing Tenure by Owners with R/ECAPs

Jurisdiction: Knox County (CDBG, HOME)

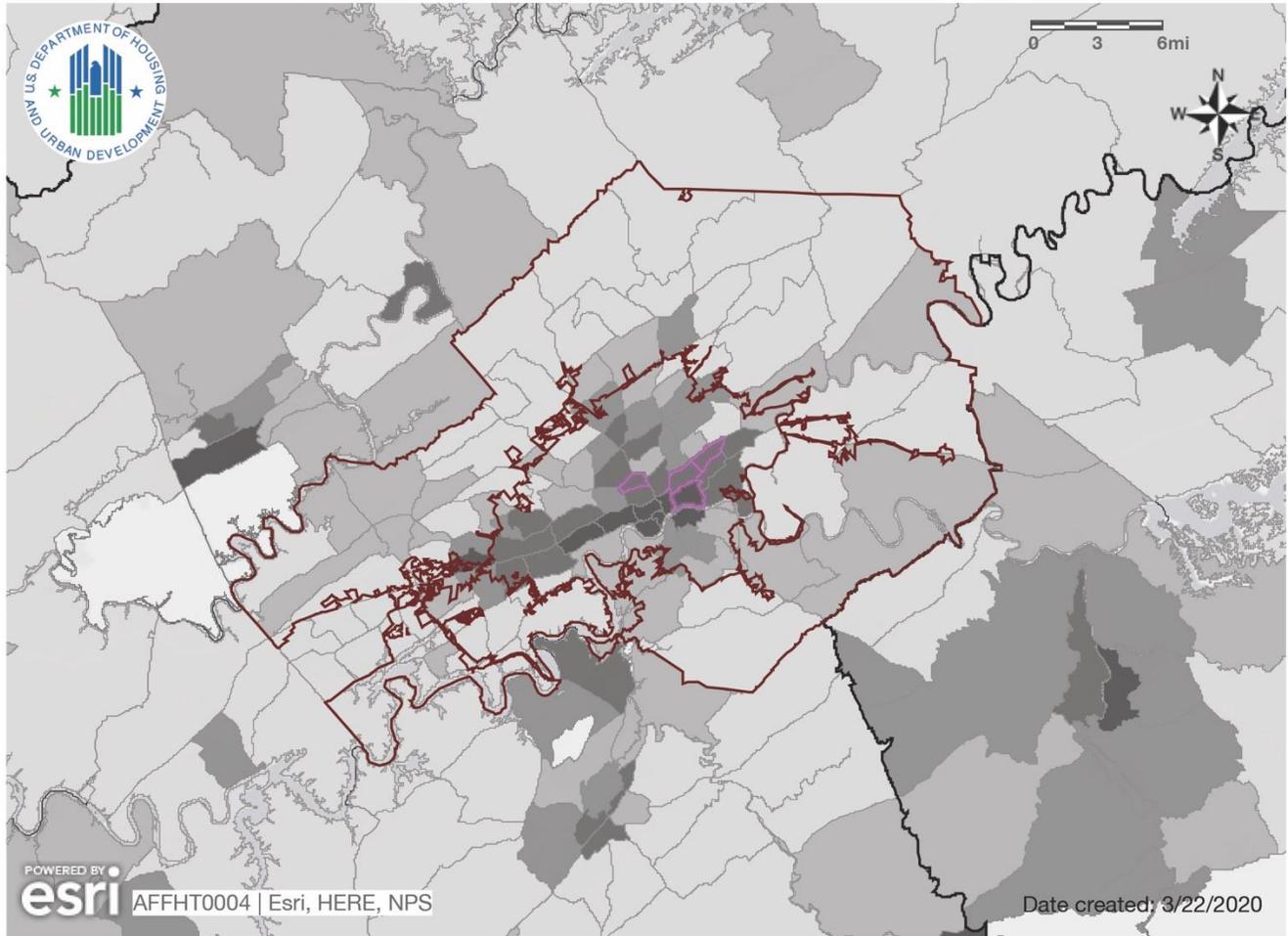
Region: Knoxville, TN

HUD-Provided Data Version: AFFHT0004

Source: AFFH Data and Mapping Tool

Map 8.2 Housing Tenure by Owners in Knox County

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Legend

Jurisdiction



Region



TRACT



R/ECAP



Percent Households who are Renters

- < 22.52 %
- 22.52 % - 35.28 %
- 35.28 % - 51.23 %
- 51.23 % - 71.83 %
- 71.83 % - 100.0 %

Percent Households who are Renters: Data not Available



Name: Map 16 - Housing Tenure

Description: Housing Tenure by Renters with R/ECAPs

Jurisdiction: Knox County (CDBG, HOME)

Region: Knoxville, TN

HUD-Provided Data Version: AFFHT0004

Source: AFFH Data and Mapping Tool

Renter occupied housing units make up almost 36% of the total occupied housing units in the city. The median rent is nearly \$839 per month, as shown in Table 8.5. Nearly 54% of the renter occupied units paid between \$500-\$999 per month, while 31% of households paid more than \$999, and 14% paid less than \$500 per month. The National Low-Income Housing Coalition (NLIHC) Report for 2019 suggests that an hourly wage of \$16.44 is necessary to be able to afford a two-bedroom apartment at Fair Market Rent in Fiscal Year 2019 in Knox County. Fair Market Rent for a Two bedroom in Knox County is \$855, and in order to afford the rent and utilities, without paying more than 30% of income on housing, the number of full-time jobs at minimum wages that will be needed to afford this rent will be **2.3**.

Table 8.5 Gross Rent Value Table

Gross Rent (Occupied Units Paying Rent)	Estimate Number
Less than \$500	8,728
\$500 to \$999	33,173
\$1,000 to \$1,499	14,683
\$1,500 to \$1,999	3,154
\$2,000 to \$2,499	633
\$2,500 to \$2,999	224
\$3,000 or more	268
Median dollars	839
No rent paid	4,559

Source: ACS 2013-2017

When evaluating mortgages and rents in the area, it is important to evaluate the housing costs with overall gross annual income. HUD suggests that households paying more than 30% of their income on housing costs (mortgage/rent payments and utilities) are cost burdened. Households whose monthly housing costs exceed 50% of their monthly income are defined as households under severe cost burden. According to ACS 2013-2017 (Table 8.6), almost 48% of the renters are paying more than 30% of their

income towards rent. The AFFH tool also provides data to supplement the understanding of cost burden for all racial/ethnic groups, age groups, and disability as shown in Tables 8.7 and 8.8.

Table 8.5 Gross Rent as a percentage of household income

Gross rent as a percentage of household income	Estimate Number
Less than 15 percent	7,524
15.0 to 19.9 percent	7,182
20.0 to 24.9 percent	8,155
25.0 to 29.9 percent	8,086
30.0 to 34.9 percent	5,505
35.0 percent or more	22,710
Not computed	6,260

Source: ACS 2013-2017

Disproportionate Housing Needs: This analysis promotes an important component of fair housing planning: to assess if any groups of persons, based on race, color, religion, national origin, sex, familial status, or disability, experience greater housing needs when compared to other populations in the jurisdiction and region. An assessment of cost burden, severe cost burden, overcrowding, and substandard housing is a necessary analysis in order to set goals and priorities, and develop strategies to address barriers to fair housing choice. For renters, housing costs include rent paid by the tenant plus utilities. For owners, housing costs include mortgage payment, taxes, insurance, and utilities. Households having more than 1.01 to 1.5 persons per room are considered overcrowded and those having more than 1.51 persons per room are considered severely overcrowded. The person per room analysis excludes bathrooms, porches, foyers, halls, or half-rooms. There are two types of substandard housing problems: Households without hot and cold piped water, a flush toilet, and a bathtub or shower; and Households with kitchen facilities that lack a sink with piped water, a range or stove, or a refrigerator.

In Map 8.3, the darker gray areas are those areas with greater housing burdens, and the lighter areas have less housing burdens. The areas with the greatest housing burden are downtown and show up in the center and on the east side of the map. Several areas with the highest rates of housing burden are mostly in the City. These areas within the City are predominantly Black populations (as indicated by the green dots) including two Racially or Ethnically Concentrated Areas of Poverty (R/ECAP) in the east. However, there are some more integrated areas and areas with predominantly White populations in the center and northwest parts of the jurisdiction that also have relatively high rates of housing burden. Two tracts running from the center to the north of the jurisdiction have lower housing burden. Generally, the housing burden decreases as one travels further out of center city toward the west. From a fair housing perspective, this map shows that both the White and Black populations experience housing burdens. However, R/ECAPS

are generally in distress, so it seems that the Black population experiences housing burdens at a slightly higher level.

Census Tracts 67.00, 19.00, 20.00, 28.00, 70.00, 26.00, and 32.00 are all towards the center of the jurisdiction and seem to have White as well as African American population in higher burden areas. However, census tract 46.10 towards the west where Knoxville City limits end also has a higher cost burden, and this census tract has a considerably higher population of residents with limited English proficiency. Table 8.7 and 8.8 suggest that in Knox County, "Asians or Pacific Islanders, Non- Hispanic," and "Black, Non-Hispanic" households are under severe cost burden. "Asians or Pacific Islanders, Non- Hispanic" is the most dominant group living with severe housing problems as well. "Hispanic" population and "Asians or Pacific Islanders, Non- Hispanic" households are experiencing any of the four housing problems.

Table 8.7 Demographics of Households with Severe

Households with Severe Housing Cost Burden	(Knox County, TN CDBG, HOME) Jurisdiction			(Knoxville, TN) Region		
Race/Ethnicity	# with severe cost burden	# households	% with severe cost burden	# with severe cost burden	# households	% with severe cost burden
White, Non-Hispanic	6,730	82,714	8.14%	34,535	305,757	11.29%
Black, Non-Hispanic	390	3,213	12.14%	4,653	20,597	22.59%
Hispanic	130	2,123	6.12%	1,324	7,233	18.30%
Asian or Pacific Islander, Non-Hispanic	234	1,301	17.99%	560	3,695	15.16%
Native American, Non-Hispanic	0	170	0.00%	103	668	15.42%
Other, Non-Hispanic	120	880	13.64%	769	3,884	19.80%
Total	7,604	90,385	8.41%	41,944	341,855	12.27%
Household Type and Size						
Family households, <5 people	3,958	58,116	6.81%	18,108	198,112	9.14%
Family households, 5+ people	439	6,329	6.94%	2,370	22,163	10.69%
Non-family households	3,234	25,917	12.48%	21,400	121,574	17.60%
Note 1: Severe housing cost burden is defined as greater than 50% of income.						
Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.						
Note 3: The # households is the denominator for the % with problems, and may differ from the # households for the table on severe housing problems.						
Note 4: Data Sources: CHAS						

Source: AFFH Data and Mapping Tool

Table 8.8 Demographics of Households with Disproportionate Housing Needs

Disproportionate Housing Needs	(Knox County, TN CDBG, HOME) Jurisdiction			(Knoxville, TN) Region		
	Households experiencing any of 4 housing problems	# with problems	# households	% with problems	# with problems	# households
Race/Ethnicity						
White, Non-Hispanic	19,033	82,714	23.01%	81,378	305,757	26.62%
Black, Non-Hispanic	954	3,213	29.69%	8,654	20,597	42.02%
Hispanic	779	2,123	36.69%	3,410	7,233	47.15%
Asian or Pacific Islander, Non-Hispanic	436	1,301	33.51%	1,293	3,695	34.99%
Native American, Non-Hispanic	0	170	0.00%	231	668	34.58%
Other, Non-Hispanic	265	880	30.11%	1,574	3,884	40.53%
Total	21,464	90,385	23.75%	96,535	341,855	28.24%
Household Type and Size						
Family households, <5 people	11,314	58,116	19.47%	43,625	198,112	22.02%
Family households, 5+ people	1,814	6,329	28.66%	7,849	22,163	35.41%
Non-family households	8,334	25,917	32.16%	45,065	121,574	37.07%
Households experiencing any of 4 Severe Housing Problems						
	# with severe problems	# households	% with severe problems	# with severe problems	# households	% with severe problems
Race/Ethnicity						
White, Non-Hispanic	7,763	82,714	9.39%	38,827	305,757	12.70%
Black, Non-Hispanic	423	3,213	13.17%	4,900	20,597	23.79%
Hispanic	319	2,123	15.03%	1,894	7,233	26.19%
Asian or Pacific Islander, Non-Hispanic	264	1,301	20.29%	759	3,695	20.54%
Native American, Non-Hispanic	0	170	0.00%	138	668	20.66%
Other, Non-Hispanic	130	880	14.77%	922	3,884	23.74%
Total	8,890	90,385	9.84%	47,440	341,855	13.88%

Source: AFFH Data and Mapping Tool

9) Home Mortgage Disclosure Act (HMDA) Data

Table 9.1 further reveals more recent data for applications received, origin of loans, applications denied, applications withdrawn, and files closed for incompleteness. According to HMDA data, most loans originated with Whites in terms of race and Not Hispanics in terms of ethnicity. Rate of denial or non-acceptance of loan applications was found to be higher in “American-Indian/Alaska Native” and African American populations, as well as Hispanics. Based on income, overall there was a denial rate of 9.9%, but for applicants that were making less than 50% of median income of the denial rate was 19.3%, followed by a denial rate of 10% among the applicants making 50- 79% of median Income.

Price appreciation in Tennessee is outpacing the nation. Since the second quarter of 2016, Tennessee home price appreciation has always exceeded the nationwide pace. In the second quarter of 2019, Tennessee’s annual price

appreciation of 7.18% was more than two percentage points higher than the U.S. price increase of 4.99%. This further adds stress on the lower income households of both owners and renters to maintain their housing status.

The National Association of Home Builders (NAHB) developed the Housing Opportunity Index (HOI), a measure of the share of homes sold in an area over a certain time that would have been affordable to a family earning the median family income of the area. The index ranges from zero to 100. The higher the index is, the more homes sold in the area are affordable to a family earning the median income. On average, 74.39% of homes sold in Knoxville would have been affordable to a family earning the median income in 2018, decreasing from 76.70% in 2017. Despite the drop in affordability, Knoxville sold 78 more houses in 2018 as compared to homes sold in 2017.

Table 9.1: Disposition of applications for FHA, FSA/RHS, VA and Conventional home-purchase loans, 1 to 4 family and manufactured home dwellings, by race, and ethnicity of applicant 2017

RACE AND GENDER 5/ 18/ 19/	Applications Received	Loans Originated	Apps. Approved But Not Accepted	Applications Denied	Applications Withdrawn	Files Closed For Incompleteness
	Number	Number	Number	Number	Number	Number
AMERICAN INDIAN/ALASKA NATIVE	13	4	1	3	5	
ASIAN	30	25	1	2	2	
BLACK OR AFRICAN AMERICAN	224	160	4	37	21	2
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	8	6		1	1	
WHITE	6188	4618	166	572	660	172
2 OR MORE MINORITY RACES	1					1
JOINT (WHITE/MINORITY RACE)	57	40	1	7	6	3
RACE NOT AVAILABLE	409	248	11	69	53	28
ETHNICITY, GENDER AND INCOME 7/ 18/ 19/						
HISPANIC OR LATINO	158	106	5	22	17	8
NOT HISPANIC OR LATINO	6271	4711	164	596	669	131
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LAT	55	37	2	7	8	1
ETHNICITY NOT AVAILABLE	446	247	13	66	54	66
INCOME OF APPLICANTS						
LESS THAN 50% OF MSA/MD MEDIAN	927	579	25	179	101	43
50-79% OF MSA/MD MEDIAN	2257	1633	68	226	250	80
80-99% OF MSA/MD MEDIAN	1088	859	23	71	114	21
100-119% OF MSA/MD MEDIAN	919	702	20	77	100	20
120% OR MORE OF MSA/MD MEDIAN	1713	1314	47	136	176	40
INCOME NOT AVAILABLE	26	14	1	2	7	2
TOTAL	6930	5101	184	691	748	206

Source: Aggregate Report by Bureau of Consumer Financial Protection

D) FAIR HOUSING STATUS

The State of Tennessee's fair housing law has received substantial equivalence certification from HUD. This certification indicates that the State has a fair housing law that provides substantive rights, procedures, remedies, and judicial review provisions that are substantially equivalent to the federal Fair Housing Act and has the capacity to enforce it. The Tennessee Human Rights Commission (THRC) handles this function for the state.

The THRC has a cooperative agreement with both HUD and the Equal Employment Opportunity Commission (EEOC) that allows for the coordination of investigations of discrimination cases and avoids duplication in efforts to end discrimination. THRC's central office is located in Nashville with regional offices in Memphis, Knoxville, and Chattanooga. From the THRC website:

The Commission is an independent state agency responsible for enforcing the Tennessee Human Rights Act and the Tennessee Disability Act which prohibit discrimination in housing, employment, and public accommodation on the basis of race, color, creed, national origin, religion, sex, disability, familial status (housing only) and age (40 and over in employment). The Commission is also responsible for coordinating the State of Tennessee's compliance with Title VI of the Civil Rights Act of 1964 which prohibits discrimination based on race, color and national origin by State agencies receiving federal financial assistance.

Unlawful discrimination is one of the most blatant impediments to fair housing, and it is therefore important to make efforts to measure the extent to which unlawful discrimination occurs in the housing market. Analyzing complaints brought by those who believe they have been illegally discriminated against can shed light on the barriers to housing choice and accessibility. Though the number of complaints cannot provide a complete picture of the level of discrimination, it can provide a snapshot of some of the

barriers that may exist. The 1998 Analysis of Impediments for Knox County can also shed some light on the community's perceptions of the fair housing environment. This section will review both the evidence of unlawful discrimination (in the form of an analysis of discrimination complaints) and the recent fair housing related activities of Knox County. Another purpose of this section is to describe the current fair housing environment. Subsequent sections of this report will analyze this information for the purpose of identifying current impediments and action steps to minimize the effect of those impediments.

Complaints of Unlawful Discrimination

In 2009-2010, Knox County conducted its second Analysis of the Impediments to Fair Housing Choice. HUD defines this procedure as a "comprehensive review of policies, practices and procedures that effect the location, availability and accessibility of housing and the current residential patterns and conditions." In order to accomplish this task, we have examined existing studies and literature, conducted a historical analysis, reviewed the public policies from a fair housing perspective, analyzed the effectiveness of existing fair housing activities and examined barriers to fair housing choice for each protected class. Between 2010 and 2014, Knox County received no Fair Housing complaints directly, and the Knoxville HUD Field Office reported receiving no complaints. An analysis is included below. It can be extremely difficult to detect unlawful discrimination, as an individual home-seeker, and the resolution of these complaints, subsequent investigation, is also important to consider. The following are the definitions utilized:

Administrative Closure: Action taken as a result of a judicial proceeding, lack of jurisdiction due to untimely filing, inability to identify a respondent or locate a complainant, or if a complainant fails to cooperate.

Conciliation: Parties meet to work out a resolution. Meeting is generally initiated by the equivalent agency (THRC) or HUD.

Withdrawal/Relief: Situation where the complainant wishes to withdraw without relief or there is relief granted following a resolution between the parties.

No Reasonable Cause: Although there may have been an action taken that appears to be discriminatory under the Fair Housing Law, there is not sufficient evidence uncovered as a result of investigation, to prove the action was in fact discrimination, or in other words one of “Reasonable Cause” to transfer to the U.S. DOJ, District Judge or the HUD Administrative Law Judge for a judicial ruling.

Reasonable Cause: As a result of investigation, that may also be considered in a conciliation or other attempted resolution action; there is sufficient evidence or “Reasonable Cause” to present the case to the (DOJ) District Judge or the HUD (ALJ), for a judicial ruling.

Table 10.1 shows the number of complaints that have been filed over the years with the Office of Fair Housing and Equal Opportunity. In 2016, 11 cases were filed against Knox County out of which 7 were filed on a racial basis. Six out of the 7 racial based cases were filed under African American race basis and 1 was filed under a Black and White Race basis. Four cases were filed with a disability basis, one case was filed with a familial status basis, and one case each was filed with a sex basis and with a retaliation basis.

NOTE: Data regarding fair housing complaints is being awaited from Tennessee Human Rights Department and final version of AI will have a more detailed analysis.

Knox County Progress in Dealing with Impediments 2015-2020

The County’s 2015 Impediments to Fair Housing was divided into three sections.

Impediment 1: Continuing Development of Fair Housing Initiatives

- + *The analysis of fair housing complaints from the Knoxville HUD Office and the Tennessee Human Rights Commission revealed no complaints over the last 10-year period.*
- + *The County’s current Fair Housing materials should be updated to include the guidance provided in CPD Notice 15-02 regarding sexual identity.*
- + *Fair housing information is available at Knox County offices and at the offices of non-profits engaged in Knox County funded housing efforts. In a number of cases, allied social service agencies or special needs organizations did not have brochures or other materials regarding Fair Housing in the public areas. In addition, there are limited instances where lenders, Realtors and associated entities provide Fair Housing information in their public areas.*

Table 10.1 Filed cases against Knox County from 2013-2016

Year	Violation County	Number of Filed Cases	Number of Filed Cases with a Race Basis	Number of Filed Cases with an Asian Race Basis	Number of Filed Cases with an Asian and White Race Basis	Number of Filed Cases with a Black or African-American Race Basis	Number of Filed Cases with a Black and White Race Basis	Number of Filed Cases with a Hawaiian or Pacific-Islander Race Basis	Number of Filed Cases with a Native American Race Basis	Number of Filed Cases with a Native American and Black Race Basis	Number of Filed Cases with a Native American and White Race Basis	Number of Filed Cases with a White Race Basis	Number of Filed Cases with an Other Multi-Racial Race Basis	Number of Filed Cases with a Color Basis	Number of Filed Cases with a National Origin Basis	Number of Filed Cases with an Hispanic National Origin Basis	Number of Filed Cases with a Disability Basis	Number of Filed Cases with a Familial Status Basis	Number of Filed Cases with a Religion Basis	Number of Filed Cases with a Sex Basis	Number of Filed Cases with a Retaliation Basis
2013	Knox	11	4	0	0	1	0	0	0	0	0	3	0	0	0	0	7	2	1	1	3
2014	Knox	19	8	0	0	6	0	0	0	0	0	2	0	1	1	1	12	0	0	6	1
2015	Knox	15	6	0	0	3	2	0	0	0	0	1	0	0	1	0	9	1	1	3	1
2016	Knox	11	7	0	0	6	1	0	0	0	0	0	0	0	0	0	4	1	0	1	1

Source: Office of Fair Housing and Equal Opportunity

- + *There is no indication that the County initiates or requests State assistance in any research or systematic testing programs to ascertain fair housing issues within the County.*

Suggested Steps to Remove this Impediment were:

1. *The County should establish a Fair Housing web page on the County's website devoted to Fair Housing. The web page can define the protected classes, provide general information on Fair Housing and Equal Opportunity and provide links to the local Fair Housing Officer, HUD and the Tennessee Human Rights Commission.*
2. *The County should maintain its efforts in outreach, training, and education of the community about fair housing rights through all types of media on an ongoing basis. This information should be made available to all County Departments, Commissions and Advisory Committees, housing and service providers as well as other public and private organizations, including Realtors, lenders, libraries, schools, and community centers. In addition, the County should encourage all agencies and private sector entities engaged in real estate activities to provide Fair Housing Information in their public areas.*

Impediment 2: NIMBY and Market Availability

- + *Lack of affordable housing for protected class persons, especially those persons with disabilities, leads to discrimination due to NIMBY-ism and unavailability. Often landlords do not want to rent to people with disabilities and sometimes residents often do not want housing for protected class people in their neighborhoods (the "Not in My Back Yard, or "NIMBY" syndrome).*
- + *Unfortunately, NIMBY continues to be a significant impediment to fair housing choice. Public hearings concerning proposed affordable housing projects bring objections galore, mostly from neighbors who cite adverse effects on traffic, infrastructure, and public services*

schools, the environment, property values, and crime rates. However, the desire to maintain a neighborhood's socioeconomic homogeneity and exclusivity is frequently unstated.

Suggested Steps to Remove this Impediment were:

1. *A continuing impediment from the 1998 and 2010 Analysis, the County should continue to expand affordable housing options for very low, low- and moderate-income residents, including public housing residents and homeless persons who seek to move into subsidized private housing.*
2. *The County should continue to respond to NIMBY issues by making creative and effective use of its HOME, CDBG and other housing resources to subsidize the sale or rental of safe, decent, and sanitary affordable housing to such residents.*

Impediment 3: Need for financial education and literacy in homeownership/rental.

- + *Surveys, interviews and feedback from meetings indicate that credit education and financial counseling remain an impediment to housing accessibility. While HUD funded housing programs provide both training and one on one counseling for home buyers, general financial literacy for at risk housing populations who are low income remains a gap.*
- + *Public education is lacking in giving people skills to be more economically independent.*

Suggested Steps to Remove this Impediment were:

1. *The County should continue to encourage efforts to provide financial literacy education. Efforts must be made to help those in the community to be pro active in establishing and maintaining good*

2. *credit instead of focusing on correcting poor credit. Data showed that most of those experiencing problems in this area were protected classes.*
3. *The County should work with local lenders and real estate professionals in helping to develop curriculum and providing instructors for some of the classes. Financial literacy education should not be limited to the public school but should take place in neighborhoods and churches.*

The County has been working on the following as regards to the previous impediments.

- + *Encouraging the private sector to disseminate fair housing brochures and flyers throughout in their public spaces*
- + *Disseminating fair housing brochures and flyers throughout the community, via conferences, housing fairs, information racks in public facilities, etc.*
- + *Reviewing proposed policies in the County land use plans*
- + *Recommending the inclusion of policies allowing for a diversity of housing types and locations*
- + *Reviewing existing zoning and land development policies for possible revisions to permit more affordable housing*
- + *Reviewing successful models for developing new low- and moderate-income housing by other communities and private developers.*

E) PUBLIC SECTOR ANALYSIS

Information from some sources is awaited and further updates to the following information will be made in the final draft.

Overview

The Fair Housing Act generally prohibits the application of special requirements through land-use regulations, restrictive covenants, and conditional or special use permits that, in effect, limit the ability of minority or the disabled to live in the residence of their choice in the community. If large-lot minimums are prescribed, if a house must contain a certain minimum amount of square feet, or if no multi-family housing or manufactured homes are permitted in an area, the results can exclude persons protected by the Act. If local mandates make it unfeasible to build affordable housing or impose significant obstacles, then a community must affirmatively work toward eliminating this impediment to fair housing choice.

The Fair Housing Acts of 1968 and 1988, as amended, also make it unlawful for municipalities to utilize their governmental authority, including zoning and land use authority, to discriminate against racial minorities or persons with disabilities. Zoning ordinances segregate uses and make differentiations within each use classifications. While many zoning advocates assert that the primary purpose of zoning and land use regulation is to promote and preserve the character of communities, inclusionary zoning can also promote equality and diversity of living patterns. Unfortunately, zoning and land-use planning measures may also have the effect of excluding lower-income and racial groups.

Zoning ordinances aimed at controlling the placement of group homes is one of the most litigated areas of fair housing regulations. Nationally, advocates for the disabled, homeless and special needs groups have filed complaints against restrictive zoning codes that narrowly define “family” for the purpose of limiting the number of non-related individuals occupying a single-family dwelling unit. The ‘group home’ arrangement/environment affords many persons who are disabled the only affordable housing option for residential stability and more independent living. By limiting the definition of “family”

and creating burdensome occupancy standards, disabled persons may suffer discriminatory exclusion from prime residential neighborhoods.

Knox County annually provides agency training in Affirmatively Furthering Fair Housing. The requirement to make HUD-compliant Fair Housing materials available is shared with all participating agencies, and materials are made available at the Fair Housing training.

For public meetings and citizen input opportunities, the following measures are taken: Notice of all meetings were published in the local newspaper and posted on the city website in both English and Spanish. Special accommodations were offered by legal notice (e.g. people with physical disabilities, non-English speaking, hearing impaired, etc.).

Outreach for citizen input is also sent to over 40 agencies and non-profit organizations inviting the agency/organization and requesting the information be made available to their clients such that it reaches a bigger section of protected classes.

Spanish interpreter is available to attend meetings on short notice if needed.

Transportation

Transportation links are an essential component to successful fair housing. Residents who do not have access to commercial areas are limited in where they can shop for goods and services, as well as seek employment. The converse is true as well. Inadequate transportation routes limit the selection of housing to neighborhoods within transportation service areas. Convenient roads in good repair are as important for those who rely on their own vehicles for transportation as they are for those who rely on public transportation. Knox County Community Action Committee (CAC) Transit provides accessible, demand response public transportation services to Knox County residents who live outside Knoxville city limits and to residents residing in areas in Knoxville that are not covered by Knoxville Area Transit (KAT) Transit. CAC Transit is available for \$2 per ride and rides can be scheduled a day before

the planned trip. Knoxville is served by their own transportation system called KAT which serves 23 fixed routes and covers over 1,100 bus stops. Additionally, Knoxville also has a free trolley line that serves the downtown and university area.

Knox County CAC Transit and ETHRA provides public demand response transit services in the urban area. Knox County CAC Transit also operates the Volunteer Assisted Transportation (VAT) program that provides services for seniors and individuals who are disabled who require additional assistance during their trips. Large urban areas like Knoxville receive federal funding called Section 5310 “Enhanced Mobility of Seniors & Individuals with Disabilities.” Agencies providing transit service within the urban area must apply for funding through the Transportation Planning Organization (TPO). At least 55% of the funds are for capital projects, and 45% may be used for operations. The TPO administers a project selection process that involves an open call-for projects from non-profits, governmental agencies, and private operators. The TPO for FY 2016 was apportioned by FTA \$541,437. Over the TPO’s first four years, the annual allocation has seen slight growth. In FY 2015, funding was awarded to six different agencies and nonprofits for the purchase of 10 vehicles to transport elderly or disabled passengers. It is expected that these types of projects will be continued as long as the Section 5310 program funds continues to be allocated.

Transportation planning in Knox County is managed by the Transportation Planning Organization (TPO), which is composed of elected officials, transportation experts, and citizen representatives for the area. Access to all forms of transportation, including for low to moderate income families, are considered by the TPO. Knox County does not currently have a municipally operated public transit system. The county instead has a wide variety of public facilities distributed across all areas of the county, including in low to moderate income areas. In lieu of having to travel downtown, citizens can access vital government services from the County Clerk, Trustee, and Sheriff near the areas where they live. Additionally, Knox County operates a robust network of Senior Centers and libraries, with broadband access available at

no charge. Employment centers are available as well, though it should be noted that they are operated by the State of Tennessee.

Mobility Plan 2040 was adopted by the TPO Executive Board on April 26, 2017. The Mobility Plan 2040 is the long-range transportation plan for the Knoxville region. Based on input from regional residents, stakeholders, and elected officials, it guides transportation decision-making in the region over the next two decades. The plan recognizes that one in four residents will be a senior by 2040, and the plan suggests investing in alternative transportation options such as transit and pedestrian facilities. As part of our Mobility Plan 2017 Project application and evaluation, they take into consideration the Americans with Disabilities Act (ADA) through equitable access criteria. Persons with disabilities are considered as part of the vulnerable population criteria and included in the equitable access component of our project evaluation. As a result of the project application prioritizing equitable access, many of the Mobility Plan projects incorporate ADA accessible pedestrian improvements into the project scope making the transportation investment equitable for all users. Other funding priorities in the Mobility Plan include ADA paratransit services across the Region.

Planned sidewalk projects include Kingston Pike between Old Stage Rd and Virtue Rd; S. Castle St. from Martin Luther King Jr. Ave. to Wilson Ave.; and Atlantic Ave from Pershing St. to Broadway.

Neighborhood Revitalization

Knox County carries out Federal programs administered by the U.S. Department of Housing and Urban Development. In FY 2020, the County will publish its Consolidated Five-Year Strategic Plan, which addresses housing and community development needs during the period of FY 2020 to 2024. The one-year Action Plan describes the activities to be undertaken during the fiscal year and how the County will use Federal and local resources to accomplish the stated objectives. The annual plan also describes how other community resources will be utilized to address the needs of the homeless,

low to moderate income individuals and families, and other targeted populations.

Property Tax Policies

Across the Country, older communities – with the support of the Federal government – have begun to invest in economic and community development programs designed to revitalize their decaying urban cores. Knox County is no exception. The foundation upon which this kind of development is built is the ability to achieve fairness in the appraisal process within these neighborhoods. Since the starting point for most bank appraisals is the tax department, discriminatory assessment practices can undermine a homebuyer's ability to secure mortgage financing in an amount commensurate with the property's true market value.

Although the Fair Housing Act specifically prohibits the consideration of the racial or ethnic composition of the surrounding neighborhood in arriving at appraised values of homes, no practical means exist to investigate violations of this kind. One reliable approach, however, is to review, periodically, the assessment policies and practices of the taxing jurisdiction since their valuations generally comprise the bases for private appraisals.

Property tax assessment discrimination against low-income groups occurs when lower value properties and/or properties in poorer neighborhoods are assessed for property tax purposes at a higher percentage of market value, on average, than other properties in a jurisdiction. Regressive assessments (the tendency to assess lower value properties at a higher percentage of market value than higher value properties) are not uncommon in this country. They result from political pressures, practical problems in assessment administration, and the use of certain inappropriate appraisal techniques. Assessments tend to remain relatively rigid at a time when property values are rising in middle income neighborhoods and are declining or remaining at the same level in low-income neighborhoods.

Inequities in property tax assessments are a problem for both lower-income homeowners and low-income tenants. Millions of low-income families own homes. Variations in assessment-to-market value ratios between neighborhoods or between higher and lower value properties can make a difference of several hundred dollars or more each year in an individual homeowner's property tax bill. In addition to causing higher property tax bills, discriminatory high assessment levels can also have an adverse impact upon property values. Buyers are less likely to purchase a property if the property taxes are perceived as too high thereby making the property less attractive and reducing its market value.

Another common inequity is the assessment of multifamily dwellings at a higher ratio to market value than single family dwellings. This type of inequity may be considered a form of discrimination against low-income groups because a higher percentage of low-income than middle-income persons live in multifamily rental dwellings. The requirement to pay a higher assessment is passed on to the tenant in the form of higher rent. Quite often, higher assessments also make it difficult for landlords to maintain property within the limits of the property's rent structure leading to substandard housing conditions.

Most jurisdictions rely heavily on a market value approach to determining value when conducting their property assessment appraisals. Under this approach, an appraiser compares recent sale prices of comparable properties within the area, in addition to site visits and a good deal of expert speculation, in arriving at an appraised value. The limitations inherent in market value approaches are many. Most prominent among them are the cumulative result of decades of discriminatory valuations, especially where the neighborhood is a minority one. Unless some radical re-appraisal process has been conducted within the preceding 10-year period, the present market value approach merely compounds past discrimination.

While the market value approach may operate successfully in some jurisdictions, a substantial percentage of jurisdictions rely primarily on a

replacement cost approach in valuing properties. Making determinations of value based on comparable sales is a complex task, which requires considerable exercise of judgment. Assessor's departments, which must appraise every property within a jurisdiction, often do not find it feasible to make the detailed individual analysis required to apply the market value approach.

Zoning and Site Selection

Zoning may have a positive impact and can help to control the character of the communities that make up a County. In zoning, a careful balance must be achieved to avoid promoting barriers to equal housing. In considering how zoning might create barriers to fair housing, four key areas were reviewed; these included the following which were selected because of the possible adverse effects they could have on families and persons with disabilities:

- + Definitions used for "families" and "group homes"
- + Regulations (if any) regarding group homes
- + Ability for group homes or other similar type housing to be developed
- + Unreasonable restrictions on developing multifamily units, such as lot size requirements.

While the definition of a group care facility is broader in terms of the number of people that can be served and limited related to temporary disability, group housing is much more restricted in where it is permitted under current zoning designations. Family care homes are permitted under all single-family zoning districts as well as all multifamily and office use districts, neighborhood business districts (light commercial), agriculture districts and mixed-use districts (traditional neighborhoods). Group homes, on the other hand, are not permitted in any single-family zoning districts and are only permitted in the highest density multifamily residential districts and commercial, office and public and institutional districts. This serves to limit group homes located in single-family, and low-density multifamily districts to only small-scale homes (six persons or less) that serve those with temporary disabilities. Generally, the concept of group homes is to integrate them into

neighborhoods, providing the maximum amount of independent living in a community-based environment. For example, those group homes that serve persons with permanent disabilities and/or more than six occupants, this neighborhood integration may be unattainable in some communities based on zoning restrictions. Knox County's land use plan requires that adequate public facilities be available for any development activities. In this context, "adequate public facilities generally refer to governmental strategies for assuring that all infrastructure required to meet the service demands of a particular development is available as development occurs. Such strategies can, where permitted by statute, require that the costs for all or a portion of such infrastructure be borne by the developer (ultimately the consumer), and not the general public. Currently, the policy of the communities within the County is that all streets, water, sewer, and storm drainage facilities within a subdivision, including any required water quality retention ponds, are paid for by the developer." The ability to provide affordable housing to low-income persons is often enhanced by an entitlement grantee's willingness to assist in defraying the costs of development. Effective approaches include contributing water, sewer, or other infrastructure improvements to projects as development subsidies or waiving impact and other fees. These types of approaches help to reduce development costs and increase affordability, allowing developers to serve lower-income households. Knox County has historically sought to defray development costs by contributing land, utilizing CDBG for targeted infrastructure and utilizing HOME funds to encourage affordable housing.

Planning and Zoning

Knoxville-Knox County Planning (Planning) was established in 1956 by Knoxville and Knox County as the agency responsible for comprehensive county-wide planning and administration of zoning and land subdivision regulations and remains so today, except for the town of Farragut. Funding for Planning activities comes primarily from city and county appropriations and from federal grants for specific studies.

The Planning Commission is comprised of 15 members: seven appointed by the Mayor of Knoxville and eight appointed by the Knox County Mayor and confirmed by the Tennessee Department of Economic and Community Development. Commissioners serve four-year staggered terms, without compensation.

An appointed executive director and a staff of 35 work in all divisions: Planning Services; Information Services; and Transportation Planning. Transportation staff provide assistance to the Knoxville Regional Transportation Planning Organization that serves Knox and urbanized portions of Blount, Loudon, and Sevier counties. In addition, Planning works with the Knox County and Knoxville Historic Zoning Commissions. The Planning Services Division studies community growth patterns and prepares plans that guide agency policy. Community facilities, neighborhood planning, and commercial corridors are part of the work of this division.

The City of Knoxville and Knox County have adopted zoning regulations as part of their code of ordinances. These ordinances detail a variety of zoning districts, uses permitted, and certain specifications for building and other site improvements. The City and County are working collaboratively to develop and innovate zoning regulations for the betterment of the community.

In addition, Planning Services staff partners with the city and county staff to administer zoning ordinances, county zoning resolution, and subdivision regulations. Applications for rezoning, use on review, subdivision, and sector plan amendments are reviewed monthly and a recommendation regarding each application is prepared.

Affordable Housing Needs and Activities

The Knox County Community Development and Housing Programs are designed to implement various housing assistance strategies that include rehabilitation, down payment assistance for first-time homebuyers, and affordable new construction. The County's community and neighborhood development activities are designed to:

- + Assist with neighborhood improvement projects
- + Encourage the development of low-income rental housing
- + Provide housing rehabilitation
- + Help low-to-moderate-income (LMI) residents acquire needed information, knowledge and skills; and
- + Enhance the provision of public services

The majority of these projects will be located in the unincorporated sections of the County.

Community Development Block Grant Program: The Community Development Block Grant (CDBG) program is used to plan and implement projects that foster revitalization of eligible communities. The primary goal of the program is the development of viable urban communities. Program objectives include the provision of decent housing, a suitable living environment, and expanded opportunities principally for LMI individuals and families. Knox County has been an entitlement community for over 35 years and receives its CDBG allocation directly from HUD.

Knox County Neighborhoods & Community Development has designed and implemented various housing assistance strategies that include homeowner rehabilitation, homeless assistance and elderly housing. The County's community and neighborhood development activities are designed to assist with neighborhood improvement projects, provide public services, help LMI residents acquire needed information, knowledge and skills to build their capacity, and enhance the provision of public services. The majority of these projects will be located in the unincorporated areas of the County.

The County provides essential services to LMI people through organizations such as Breakthrough Corporation, Helen Ross McNabb, and the Volunteer Ministry Center, to name a few. Quality, affordable housing is also a high priority. Knox County will address housing through the Knoxville/Knox County Community Action Committee Sustainable Housing Program and Neighborhood Housing Inc. Minor Home Repair Program. The agencies listed

above provide essential public services or housing for LMI persons and families.

HOME Investments Partnerships Program (HOME): The HOME Investments Partnerships Program (HOME) primary objective is to provide affordable housing for LMI individuals that reside in our community. The HOME program has provided both multi-family and single-family homes to stabilize the lives of individuals that have difficult obstacles to overcome to obtain the basic necessities of life.

Assistance to the homeless is provided through the State funded Environmental, Social and Governance funds and various federally funded Programs through the Knoxville/Knox County Continuum of Care.

Affordable Housing Priorities from 2019

The 2019 Annual Action Plan identified expanding affordable housing Opportunities under which the County rehabilitated 6 rental units, and 105 homeowner housing. Some of the planned activities included:

- 1) Rehabilitation Projects
 - Catholic Charities – Bathroom Upgrades - \$46,500/42
 - Florence Crittenton - Housing Rehab for Youth Residential Care - \$100,000/10 CAC – Sustainable Housing Program – \$539,151/85
 - NHI - Minor Home Repair - \$45,000/20
 - Sertoma – Roofing and Bathroom Rehab @ (3) Group Homes - \$14,800/6 Housing Services - Administer Housing Services Program - \$46,644.20
- 2) Preserve the existing low-income, owner-occupied, single-family housing and multifamily rental housing inventory by addressing minor home repairs, housing rehabilitation, water, sewer, and septic installation.

- 3) Rehabilitate multi-family homeless and/or units for low and moderate-income persons, including those who are affected by human trafficking.
- 4) New construction of rental housing for LMI seniors.
- 5) HOME Funds were used for new construction of rental housing for LMI seniors, with the completion date in Planning year PY19 or PY20. HOME (including CHDO set aside) funds to be used for support acquisition and/or new construction and/or rehab activities for 2019. Provision is for single-family or multi-family housing for LMI clients.

Institutional Structure

The Community Development Department of Knox County is the lead agency implementing the strategies for addressing housing and community development needs identified as part of its consolidated planning process. The Department, with County Commission approval, oversees the local allocation of Knox County's allocation of CDBG funds and is responsible for maintaining records, overseeing work done using these federal funds, and reporting information to HUD concerning the performance of these programs. Knoxville's Community Development Corporation is responsible for the development and maintenance of the County's public housing. The member agencies of the County Continuum of Care Housing Coalition work with the County to address the ongoing needs of the homeless and persons with special needs. The County also coordinates its efforts with other local, state and federal institutions to address specific needs or to implement new programs. Affordable housing in the County is provided through a variety of public agencies, nonprofit organizations, private sector developers, and lenders. In many cases, individual housing providers focus their efforts on specific income groups, tenure types, or on providing certain types of housing and supportive services.

Intergovernmental Cooperation

The County has enjoyed a positive relationship with Knoxville's Community Development Corporation, the City of Knoxville, and Continuum of Care Agencies for many years. The County Staff and the other Agencies work cooperatively and share information relative to the County's strategies to address housing and other community development needs.

Lead-Based Paint Hazard Reduction

Lead poisoning is one of the worst environmental threats to children in the United States. While anyone exposed to high concentrations of lead can become poisoned, the effects are most pronounced among young children. All children are at higher risk to suffer lead poisoning than adults; but children under age six are even more vulnerable because their nervous systems are still developing. At high levels, lead poisoning can cause convulsions, coma, and even death. Such severe cases of lead poisoning are now extremely rare but do still occur. At lower levels, observed adverse health effects from lead poisoning in young children include reduced intelligence, reading and learning disabilities, impaired hearing, and slowed growth. Since the 1970s, restrictions on the use of lead have limited the amount of lead being released into the environment. As a result, national blood lead levels for children under the age of six declined by 75 percent over the 1980s and dropped another 29 percent through the early 1990s. Despite the decline in blood-lead levels over the past decade, recent data show that 900,000 children in the United States still have blood lead levels above 10µg/dL (micrograms of lead per deciliter of whole blood). These levels are unacceptable according to the Centers for Disease Control and Prevention (CDC) which lowered blood lead intervention levels for young children from 25µg/dL to 10µg/dL in 1991. Many of these lead-poisoned children live in low-income families and in old homes with heavy concentrations of lead-based paint. The CDC identified the two most important remaining sources of lead hazards to be deteriorated lead-based paint in housing built before 1978 and urban soil and dust contaminated by past emissions of leaded gasoline. The national goal for blood lead levels among children ages six months to five years is to limit

elevations above 15µg/dL to no more than 300,000 per year and to entirely eliminate elevations above 25µg/dL.

Many housing units in the County may have lead-based paint. Since the County undertakes the rehabilitation of limited to comprehensive rehabilitation of housing units (many of which were constructed prior to 1978), painted surfaces will be disturbed as part of this process. As such, the County is required to incorporate lead-based paint hazard evaluation, approved remediation/reduction strategies and clearance requirements for all housing structures built before 1978. To reduce the potential for adverse health effects attributable to the rehabilitation of deteriorated lead-based paint surfaces, the County provides educational material. All customers receiving housing rehabilitation assistance from the city are informed about the potential health hazards posed by the presence of deteriorated lead-based paint, which includes information about protecting their families from this hazardous substance.

In addition, Project Managers who oversee rehabilitation projects are trained to incorporate proper hazard reduction techniques into the treatment of lead-based paint. Instead of performing lead hazard evaluations on properties proposed for rehabilitation, it is County's policy to automatically presume that lead-based paint and/or lead-based paint hazards are present when the housing was built before 1978. Visual assessment, stabilization and standard treatment methodologies are employed to achieve clearance for each comprehensive rehabilitation project. The County will conduct one of the following lead hazard reduction methods as routine to rehabilitation activity:

- + If interim controls are required, conduct standard treatments in lieu of interim controls on all applicable surfaces, including soil, to control lead based paint hazards that may be present.
- + If abatement is required, abate all applicable surfaces, including soil, to control lead based paint hazards that may be present.

The County currently provides funding to a local housing agency for all minor home repairs and housing rehabs. Knox County lead-based paint abatement equipment as well as covering training for staff lead abatement certification.

F) PRIVATE SECTOR ANALYSIS

Information from some sources is awaited and further updates to the following information will be made in the final draft.

Homeownership rates are important to a community's financial well-being. Prospective homebuyers expect to have access to mortgage credit; and home ownership programs must be available without regard to discrimination, income, or profession. To truly live up to fair housing laws, all persons must have the ability to live where they want and can afford.

Access to mortgage credit enables residents to own their homes, and access to home improvement loans allows them to keep older houses in good condition. Access to refinancing loans allows homeowners to make use of the equity in their home for other expenses. Mortgage credit, home improvement loans, and refinancing loans together keep neighborhoods attractive and keep residents vested in their communities.

Lenders in Knox County

Poor lending performance results in various long-term and far ranging community problems. Of these, disinvestment is probably the most troubling. Disinvestment in Knox County by its lenders would reduce housing finance options for borrowers and weaken competition in the mortgage market for LMI neighborhoods. High mortgage costs, less favorable mortgage loan terms, deteriorating neighborhoods, reduced opportunities for home ownership, reduced opportunities for home improvement and the lack of affordable housing are only a few of the consequences of inadequate lending performance. Financial decay in the business sector as well as in the private sector is also a result of disinvestment in the form of business relocation, closure, and bankruptcy. Full service local lenders that have traditionally served residents and businesses are one of the main elements that keep neighborhoods stable. Significant changes are occurring in the lending market not only in Knox County but throughout the United States. The number and type of lenders have changed over the last ten years, and many local lenders

have been bought by national lenders. These national lending institutions are becoming increasingly more active locally, as their market share grows yearly.

There were 448 financial institutions that were reported for the 2018 Aggregate report for Knoxville MSA area. 20,474 conventional loans related activities were reported in Knox County for the year 2018, including 13,183 originated loans, 3,556 denied applications, and 3,735 purchased loans. While the physical presence of financial institutions in communities facilitates relationships with banks and the location of these institutions is a primary concern for a community, the advent of online banking has increased both the choice of mortgage products and the overall competitiveness in the lending industry.

Alternative Lending Sources

Sub-Prime Lenders: While conventional lenders focus their marketing efforts on consumers with few or no credit blemishes (those with "A" credit), an alternative source of loan funds for consumers with lower credit scores ("B" or "C" credit) is sub-prime lending institutions. While sub-prime lenders simplify the application process and approve loan applications more quickly and more often, these lenders also charge higher interest rates to help mitigate the increased risk in lending to consumers with poorer credit histories. Interestingly, consumers who borrow from sub-prime lenders often do qualify for loans from conventional lenders but succumb to marketing tactics that encourage them choose sub-prime institutions over conventional. Recent studies by Freddie Mac, the government-sponsored entity that purchases mortgages from lenders and packages them into securities that are sold to investors, show that between 25-35% of consumers receiving high cost loans in the sub-prime market qualify for conventional loans. This may be a result of the loss of conventional lenders in the community. Having fewer lenders from which to choose, consumers select those that are conveniently located, even at a higher price.

"Payday Lenders": Another source of loans is check cashing or "payday" lenders. Check cashing outlets (such as currency exchanges) cash payroll,

government, and personal checks for a fee. Their popularity increases as customers lose access to banks or cannot afford rising fees associated with the inability to maintain minimum balance requirements. Consumers use these outlets for their banking needs and are charged for the services they receive. These businesses offer temporary “payday loans” by accepting a postdated check from the customer, who receives the funds immediately, minus a fee. When used regularly, these fees can equate to double-digit interest rates.

Although these services tend to be located in areas of highest minority and low-income concentration, they are also found in very close proximity to local lenders. Customarily, however, they fill the void left by banks that do not service an area or have moved from it.

Predatory Lenders: While most sub-prime lenders serve a need by targeting borrowers with sub-par credit histories, some go too far. Those that do are known as predatory lenders. Lending becomes predatory when lenders target specific populations (such as low-income, minority, or elderly homeowners), charge excessive fees, frequently refinance the loan, and often mislead the borrower. Since wealth is often tied to property ownership, this system threatens to deprive residents of their assets by overextending their home’s equity and, in some cases, foreclosing on the homes of people who cannot afford the high interest rates and associated fees.

Mainstream financial institutions often unwittingly exclude the very groups targeted by predatory lenders when they market loan products. Additionally, unknowing consumers find themselves at a disadvantage due to a lack of financial savvy. The lending process can be complicated, and often consumers are ill-prepared to deal with the large volume of paperwork required for the loan process. Most predatory lenders use their clients’ inexperience to their advantage, however, and do not provide quality counseling for consumers seeking their products. They use the consumers’ ignorance as their opportunity to reap profits. In the end, borrowers pay substantially higher

interest rates and purchase unnecessary credit, life, and disability insurance products.

Stakeholder meeting and stakeholder survey responses haven’t indicated any acts of discrimination and further analysis will be added in the final version of the AI.

Advertising

In the context of fair housing, discriminatory advertising is any advertising that indicates any preference, limitation, or discrimination based on race, color, religion, sex, handicap, familial status, or national origin, or an intention to make any such preference, limitation, or discrimination. Overt or tacit discriminatory preferences or limitations are often conveyed through the use of particular words, phrases, or symbols. HUD has strict advertising guidelines which define appropriate language and graphics related to fair housing advertisements.

In a general review of several local Knox County and regional publications carrying ads for housing, no systematic attempt to exclude particular demographic groups was observed. Still, there were several incidents found that suggest that there is a need for fair housing training review sessions for real estate agents as inconsistency was noted in the private apartment complexes’ websites in Knox County, as they do not provide any information about fair housing.

The Knoxville Apartment Guide does have both the equal opportunity logo and a strong statement affirming equal opportunity in housing: “We are an equal opportunity housing provider. We do not discriminate on the basis of race, color, national origin, religion, sex, family status or disability.

Stakeholder meeting and stakeholder survey responses haven’t indicated any acts of discrimination and further analysis will be added in the final version of the AI.

