# **City of Little Rock**

2021 Analysis of Impediments to Fair Housing Choice

### **2020 CITY OF LITTLE ROCK**

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



Prepared for: The City of Little Rock 500 West Markham Street Little Rock, AR 72201

Prepared by: Western Economic Services, LLC 212 SE 18<sup>th</sup> Avenue Portland, OR 97214 Phone: (503) 239-9091 Toll Free: (866) 937-9437 Fax: (503) 239-0236

Website: http://www.westernes.com

Draft for Public Review May 3, 2021

i

# Has Your Right to Fair Housing Been Violated?

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

#### **Arkansas Fair Housing Commission**

323 Center Street, Suite 1200 Little Rock, AR 72201 Phone: 501-682-3247 Toll Free Number: 1-800-340-9108

Legal Aid of Arkansas

1200 W Walnut Rogers, AR 72756 1-870-338-9834

#### U.S. Department of Housing and Urban Development

Little Rock Field Office Phone: (501) 324-6296 Fax: (501) 918-5410 TTY: (800) 877-8339

### Table of Contents

SECTION I. EXECUTIVE SUMMARY	1
SECTION II. COMMUNITY PARTICIPATION PROCESS	7
A. Overview	7
B. The 2021 Fair Housing Survey	7
C. Fair Housing Forum	7
D. THE FINAL PUBLIC REVIEW PROCESS	8
SECTION III. ASSESSMENT OF PAST GOALS AND ACTIONS	9
A. Past Impediments and Actions	9
Section IV. Fair Housing Analysis	15
A. Socio-Economic Overview	15
B. Segregation and Integration	44
C. RACIALLY OR ETHNICALLY CONCENTRATED AREAS OF POVERTY	45
D. DISPARITIES IN ACCESS TO OPPORTUNITY	48
E. DISPROPORTIONATE HOUSING NEEDS	59
F. Publicly Supported Housing Analysis	84
G. DISABILITY AND ACCESS ANALYSIS	89
H. Fair Housing Enforcement, Outreach Capacity, & Resources	97
I. Fair Housing Survey Results	103
J. MUNICIPAL AND ZONING CODE REVIEW	107
SECTION V. FAIR HOUSING GOALS AND PRIORITIES	110
SECTION VI. APPENDICES	115
A. Addition al Plan Data	115
B. PUBLIC INPUT DATA	122

### Section I. Executive Summary

#### Overview

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

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

#### Assessing Fair Housing

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

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

In July of 2015, HUD released a new AFFH rule which provided a format, a review process, and content requirements for the newly named "Assessment of Fair Housing", or AFH.<sup>5</sup> The assessment would now include an evaluation of equity, the distribution of community assets, and access to

<sup>&</sup>lt;sup>1</sup> <u>https://www.hud.gov/program offices/fair housing equal opp/fair housing and related law</u>

<sup>&</sup>lt;sup>2</sup> § 5.152 Affirmatively Furthering Fair Housing

<sup>&</sup>lt;sup>3</sup> § 5.152 Affirmatively Furthering Fair Housing

<sup>&</sup>lt;sup>4</sup> 42 U.S.C.3601 et seq.

<sup>&</sup>lt;sup>5</sup> 80 FR 42271. https://www.federalregister.gov/documents/2015/07/16/2015-17032/affirmatively-furthering-fair-housing

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

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

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

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

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

#### Socio-Economic Context

While the population in the City of Little Rock has grown by 2.0 percent between 2010 and 2019, the racial and ethnic makeup of the area is not changing significantly. However, there are areas in the City that have high concentrations of African American and Hispanic residents, particularly in central Little Rock. Limited English Proficiency includes an estimated 3.3 percent of the population speaks Spanish at home, followed by 0.4 percent speaking Chinese. The population in Little Rock is aging, as those aged 55 and older are increasing as a percentage of the population. In 2019, 23.3 percent of the population had a high school diploma or equivalent, another 28.2 percent have

<sup>&</sup>lt;sup>6</sup> 83 FR 683 (January 5, 2018)

some college, 22.8 percent have a Bachelor's Degree, and 16.2 percent of the population had a graduate or professional degree.

In 2019, unemployment in the City of Little Rock was at 3.3 percent, compared to 3.5 percent for the State of Arkansas. This is representative of a labor force of 97,857 people and 94,602 people employed. Real per capita income in Pulaski County has remained higher than the state rate in recent years. However, poverty has grown to 16.6 percent, representing 32,408 persons living in poverty in the City.

Little Rock's housing production has remained relatively steady since 2012, with production ranging from 608 to 1,100 units annually. In 2019, there were 1,019 total units produced in the City, with 480 of these being single family units. Single family unit production declined beginning in 2008 and have increased slightly since that time. The value of single-family permits, however, continued to rise until 2018 before dropping slightly \$265,234 in 2019. Since 2010, the City has a slight increase in the proportion of vacant units, mainly seen in the increase in the number of "other" vacant units. Housing prices are markedly higher in northwestern Little Rock for both rental costs and home values when compared to central and southern Little Rock.

#### **Overview of Findings**

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

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

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

Table I.1       Contributing Factors       City of Little Rock					
Contributing Factors	Priority	Justification			
Moderate to high levels of ægregation	Low	African American and Hispanic households have moderate to high levels of segregation, according to the Dissimilarity Index. American Indian, Native Hawaiian, and "other" race households had moderate or high levels of segregation. However, these racial groups represent a small percentage of the population, less than one percent each.			
Access to low poverty areas and concentrations of poverty	Med	Low poverty index is markedly lower for African American and Hispanic populations than white low poverty access, indicating inequitable access to low poverty areas. In addition, there are concentrations of poverty in central Little Rock.			
Access to labor market engagement	Low	African American and Hispanic households have less access to labor market engagement as indicated by the Access to Opportunity index. However, the City has little control over impacting labor market engagement on a large scale.			
Access to school proficiency	Med	African American and Hispanic households have lower levels of access to proficient schools in Little Rock. This also varied geographically with school proficiency index ratings that were lower in central Little Rock.			
Insufficient affordable housing in a range of unit sizes	High	Some 31.5 percent of households have cost burdens. This is more significant for renter households, of which 45.2 percent have cost burdens. This signifies a lack of housing options that are affordable to a large proportion of the population.			
African American, Hispanic, Native American, and Native Hawaiian/Pacific Islander households with disproportionate rates of housing problems	High	The average rate of housing problems, according to CHAS data is 33.1 percent, according to CHAS data. African American households face housing problems at a rate of 43.0 percent. Hispanic households face housing problems at a rate of 43.5 percent.			
Discriminatory patterns in Lending	Med	The mortgage denial rates for African American and Hispanic applicants are higher than the jurisdiction average according to 2008-2019 HMDA data. The denial rates for African American applicants are 11.6 percentage points higher than the jurisdiction average, and Hispanic denial rates were 8.3 percentage points higher than non-Hispanic applicants.			
Insufficient accessible affordable housing	High	The number of accessible affordable units may not meet the need of the growing elderly and disabled population, particularly as the population continues to age. Some 50.7 percent of persons aged 75 and older have at least one form of disability.			
NIMBYism	High	Public input suggested one of the major barriers to the development of affordable housing options in the City was the Not In My Back Yard (NIMBY) mentality in the City.			
Lack of fair housing infrastructure	High	The fair housing survey and public input indicated a lack of collaboration among agencies to support fair housing.			
Insufficient fair housing education	High	The fair housing survey and public input indicated a lack of knowledge about fair housing and a need for education.			
Insufficient understanding of credit	High	The fair housing survey and public input indicated an insufficient understanding of credit needed to access mortgages.			

4

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

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

	Table I.2				
Fair Housing Goal	Fair Housing Issue(s)	Impediments to Fair Housing Choice/ Contributing Factors	Recommended Actions		
Promote affordable homeow nership and rental opportunities outside of R/ECAPs	Segregation R/ECAPs Disproportionate Housing Needs Publicly Supported Housing	Moderate to high levels of segregation Inequitable access to proficient schools and labor market engagement Insufficient affordable housing in a range of unit sizes Discriminatory patterns in Lending Inequitable access to low poverty areas and concentrations of poverty	Continue to promote homeownership and affordable rental opportunities outside of R/ECAPs with the use of CDBG and HOME funds. Over the next five (5) years: 375 Homeowner Housing Rehabilitated 20 New Construction Developed 5 Houses Acquired & Rehabilitated 75 Homeowner provided Down payment assistance		
Promote Community Development activities in areas with higher rates of poverty	Disparities in Access to Opportunity	Moderate to high levels of segregation Inequitable access to proficient schools and labor market engagement Inequitable access to low poverty areas and concentrations of poverty	Continue to promote public services, public facilities, and infrastructure improvements with CDBG funds in low to moderate income neighborhoods or to benefit LMI households. Over the next five (5) years: Benefit 75,000 households with improved access to public services		
Promote community and serv ice provider knowledge of ADA laws	Disability and Access Publicly Supported Housing	Insufficient accessible affordable housing	Increase outreach and education for housing providers in the City, focusing on legal requirements concerning reasonable accommodation, in coordination with local disability advocate organizations and Legal Aid of Arkansas. Record activities annually.		
Increase outreach and education for housing prov iders in the City and the public	Fair Housing Enforcement and Outreach Publicly Supported Housing	Discriminatory patterns in Lending Lack of fair housing infrastructure Insufficient fair housing education Insufficient understanding of credit	Continue to conduct fair housing outreach and education targeting rental tenants, providing an overview of fair housing laws and examples of discrimination that housing consumers may encounter in the rental housing market. Promote education through website and online materials, as well as printed materials at City offices and community centers/libraries. Continue working with the Arkansas Fair Housing Commission and Legal Aid to promote fair housing and process complaints. Record activities annually.		

Executive Summary

### Section II. Community Participation Process

The following section describes the community participation process undertaken for the 2021 City of Little Rock Analysis of Impediments to Fair Housing Choice.

#### A. OVERVIEW

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

The Fair Housing Survey was distributed as an internet outreach survey. As of the date of this document, 191 responses have been received.

A Fair Housing Forum was held on March 18<sup>th</sup>, 2021 in order to gather feedback and input from stakeholders and members of the public.

The Draft for Public Review AI was made available on May 6<sup>th</sup>, 2021 and a 30-day public input period was initiated.

A public hearing will be held, during the public review period in order to gather feedback and input on the draft Analysis of Impediment. After the close of the public review period and inspection of comments received, the final draft will be made available to the public at the beginning of June 2021.

#### **B.** THE 2021 FAIR HOUSING SURVEY

The purpose of the survey, a relatively qualitative component of the AI, was to gather insight into knowledge, experiences, opinions, and feelings of stakeholders and interested citizens regarding fair housing as well as to gauge the ability of informed and interested parties to understand and affirmatively further fair housing. Many individuals and organizations throughout the City of Little Rock were invited to participate. At the date of this document, some 224 responses were received. A complete set of survey responses can be found in *Section IV.I Fair Housing Survey Results*.

#### C. FAIR HOUSING FORUM

A Fair Housing Forum was held on March 18<sup>th</sup>, 2021. A summary of the comments received during this meeting is also included below. The complete transcripts from these meetings are included in the Appendix.

- Lack of opportunity in areas with high poverty
- Noticing disability discrimination complaints
- Limitations in historic districts in building and renovations
- Need for homeowner rehabilitation and down payment assistance
- Need for additional outreach and education for public and landlords

### **D. THE FINAL PUBLIC REVIEW PROCESS**

A 30-day public review process will be held May 6, 2021 through June 4, 2021. It will include a public review meeting during this time. Comments from this meeting will be summarized below.

## Section III. Assessment of Past Goals and Actions

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

#### A. PAST IMPEDIMENTS AND ACTIONS

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

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

#### Impediment: Housing Affordability and Insufficient Income.

**Determinant:** The inability to qualify for mortgage financing and a lack of affordability in rental housing are impeding housing choice in the City of Little Rock.

**Determinant:** Lack of affordability, that is households having inadequate income to acquire housing currently available in the market, may be the most critical impediment faced by households in the City.

**Impediment #1:** Overall, the income data show a higher proportion of African- American, Hispanic and lower income households disparately impacted by the cost of housing .

**Impediment #2:** Areas where minorities and lower income households are most likely to find housing affordable are in older neighborhoods with older housing stock , and some that are minority and low income concentrated census tracts.

**Impediment #3:** Household Incomes are not keeping pace with the market prices of housing and many households are "cost burdened" paying more than 30 percent and even "severely cost burdened" by HUD definition paying 50 percent or more of their household income for housing and housing related expenses.

**Impediment #4:** Additional funding is needed to provide subsidies that make homeownership attainable , maintenance of existing housing more affordable and to increase availability of rental subsidies for low-income and moderate-income persons, special needs populations such as seniors, victims of domestic violence, former convicted felons , and people with disabilities .

#### **Recommended Remedial Actions**

Action #1: City of Little Rock will continue to support the increased production of affordable housing through public private partnerships with developers and capacity building for nonprofits with the Entitlement Funds.

Action #2: City of Little Rock will continue to help facilitate access to below- market-rate priced units by using its' federal funds to leverage nonfederal entitlement funding such as state low income tax credit and federal home loan bank funding and private sector participation in financing affordable housing and for neighborhood reinvestment.

Action #3: City of Little Rock will continue to maintain a list of private partner lenders providing affordable housing financing and subsidies or offering buyers access to down payment, closing cost or favorable underwriting that supports buyers.

Action #4: City of Little Rock will continue to identify and support private and nonprofit developers seeking additional federal, state and private sources of funds for affordable housing as they become available.

Action #5: City of Little Rock will continue to encourage private sector support for affordable housing developed as a component of market rate and mixed use development.

#### Public Policy and Fair Housing Infrastructure Impediments

**Impediment:** Public Awareness of Fair Housing and greater Outreach and Education are needed for the public, protected class members under the Fair Housing Act and industries such as landlords, finance, social service agencies and community organizations.

**Determinant:** City and State Fair Housing regulations were compared to the Federal Fair Housing Act and the analysis has determined that the City of Little Rock has not enacted regulations that offer similar rights, remedies, and enforcement to the Federal Fair Housing Act.

**Determinant:** Continued emphasis on public awareness of fair housing is needed. General public education and awareness of fair housing issues need to be increased.

**Impediment #5:** Greater Public Awareness, outreach and education of Fair Housing is needed.

**Impediment #6:** Continued emphasis on fair housing enforcement, including training and testing is needed .

**Impediment #7:** Continued emphasis on targeted outreach and education to immigrant populations that have limited English proficiency, language speaking barriers, and to other protected classes with language barriers is needed.

#### **Recommended Remedial Actions:**

Action #6: City of Little Rock will increase fair housing education and outreach in an effort to raise awareness and increase the effectiveness of fair housing ordinances.

Action #7: City of Little Rock will partner with local industry to conduct ongoing outreach and education regarding fair housing for the general public and focused toward protected class members, renters, home seekers, landlords, and property managers.

Action #8: Encourage Fair Housing Enforcement Agencies to target increase fair housing testing for multifamily properties. City of Little Rock will encourage HUD to provide increased fair housing testing in local apartment complexes. T

#### Banking, Finance, Insurance and other Industry related impediments

**Impediment:** Disparate Impacts of mortgage lending on minority populations and lower income areas; and the lingering impacts of the Subprime Mortgage Lending Crises and increased Foreclosures.

**Determinant:** Overall, the number of applications and origination rates among Whites were higher than that of minorities in all loan types home purchase, home improvement and refinance loans.

**Determinant:** A lack of financial literacy and credit are limitations faced by many in acquiring housing of their choice.

**Determinant:** The higher denial rates for minorities and lower income groups, coupled with lower origination among all income groups in lower income census tracts is adversely impacting fair housing conditions.

**Impediments #8:** Minority and lower income persons are disparately impacted by higher loan denial percentages and lower number of applications submitted to lenders.

#### **Recommended Remedial Actions:**

Action #9: City of Little Rock will support applications for competitive and non-Entitlement State and Federal funding and assistance to nonprofit intermediaries providing financial literacy education programs.

Action #10: City of Little Rock will encourage bank and traditional lenders to offer products addressing the needs of households with poor and marginal credit negatively impacting their ability to qualify for mortgages.

Action #11: City of Little Rock will encourage the appraisal industry to evaluate concerns that comparability for new affordable housing units when evaluated for financing is limited in some areas if new housing construction has not occurred in recent years.

#### Socio-Economic Impediments

**Impediment:** Barriers to Fair Housing ChoiceImpacts on Special Need Populations, minorities and low income.

**Determinant:** The Community Profile, Fair Housing Index and Home Mortgage Disclosure Act (HMDA) Analyses all revealed disparate impacts on minority and low income populations when comparing income, educational attainment, poverty, unemployment, mortgage and housing lending, homeownership and other characteristics to that of Whites.

**Determinant**: Elderly Persons and Households. Seniors are living longer; lifestyles are changing and desire for a range of housing alternatives increasing.

**Determinant:** Persons with Disabilities. Building codes and ADA regulations require a percentage of units in multifamily residential complexes be wheelchair accessible and accessible for individuals with hearing or vision impairments.

**Determinant:** Homeless Individuals. The primary barrier to housing choice for homeless individuals is insufficient income.

**Determinant:** Limited English Proficiency (LEP} Individuals. Local service providers state that as financial institutions institute more stringent lending practices and outreach to minority communities has declined with the economy, LEP and undocumented individuals face greater challenges in securing a mortgage.

**Impediment #9:** Expansion of the supply and increased affordability of housing for senior, special needs housing and housing for disabled persons is needed.

**Impediment #10:** Removal of barriers for persons with limited English proficiency enabling them to better access the housing market is needed.

#### **Recommended Remedial Actions:**

Action #12: City of Little Rock will continue to support language assistance to persons with limited English proficiency.

Action #13: City of Little Rock will continue to encourage recruitment of industry and job creation that provide "living wages", incomes to pay for basic necessities of food, shelter, transportation, to persons currently unable to afford market rate housing.

Action #14: City of Little Rock will support developments requesting State assistance that provides alternative housing product choices for seniors such as Low Income Housing Tax Credits and Senior Housing Tax Credits.

#### Neighborhood Conditions Related Impediments

**Impediment:** Limited resources to assist lower income, elderly and indigent homeowners maintain their homes and stability in neighborhoods.

**Determinant:** The potential for neighborhood decline and increasing instability in City of Little Rock's older neighborhoods is a growing concern.

**Impediment# 11:** Expanded resources are needed to assist lower income persons, seniors and other special needs groups with maintaining homes and improving neighborhood stability.

#### **Recommended Remedial Action:**

Action #15: The City currently supports programs that provide assistance to income qualified low and moderate income households utilizing its' Entitlement Grants Programs and support self help initiatives utilizing nonprofit and private sector resources. The City will continue its support and implementation of these programs. Other activities that will be considered include:

#### FAIR HOUSING ACTIVITIES

The following actions have been described in the 2019 Consolidated Annual Performance and Evaluation Report (CAPER):

In 2019, the City engaged in activities that directly addressed the following impediments. The impediments identified were:

## Real Estate and Housing Market Related Impediments: Housing Affordability and Insufficient Income.

• Staff worked with local banks, developers and non-profit organizations to expand the stock of affordable housing.

**Public Policy and Fair Housing Infrastructure Impediments:** Public awareness of fair housing and greater outreach and education are needed for the public, protected class members under the Fair Housing Act and industries such as landlords, finance, social service agencies and community organizations.

• Staff continued to attend and participate in fair housing workshops to increase their knowledge. Staff promoted fair housing workshop among their partners and the community.

**Banking, Finance, Insurance and other Industry related Impediments:** Disparate Impacts of mortgage lending on minority populations and lower income areas; and the lingering impacts of the Subprime Mortgage Lending Crisis and Increased Foreclosures.

• Staff worked with local banks and housing counselors.

**Social-Economic Impediment:** Barriers to Fair Housing Choice Impact on Special Need Populations, minorities and low income.

• Housing & Neighborhood Programs (HNP) has three (3) bilingual Code Enforcement Officers to assist the City to overcome language barrier in the Hispanic Community. HNP is continuing to update documents to include English and Spanish.

• The City and Chamber of Commerce continued to work on expanding job opportunities through the recruitment of corporations and the provision of incentives for local corporations seeking expansion opportunities.

• The City continued to support agencies that provide workforce development programs and continuing education courses to increase the educational level and job skills of residents. The City's Re-Entry Program provides pre-release programming and employment placement services to Little Rock residents with history of convictions and/or incarceration. The Community Program Department hired over six hundred (600) youths for their Summer Employment Program and conducted Career & Life Skills Training. Career Empowerment Opportunity, was a pilot program to increase the quality of life by empowering citizens to move from not having a job to enjoying a career and becoming a homeowner within 12-24 months.

**Neighborhood Conditions Related Impediment:** Limited resources to assist lower income, elderly and indigent homeowners maintain their homes and stability in neighborhoods.

• Several neighborhood organizations held area cleanups to assist elderly homeowners.

• World Changers Inc., a faith-based organization, provided labor to paint the exterior of houses for very-low income, elderly residents. Over two hundred (200) volunteers from six (6) states participated in the program.

• Mainstream Inc. coordinated the construction of wheelchair ramps at private residence of persons with disabilities. The ramps are constructed by volunteers of the AT&T Telephone Pioneers formerly known as Southwestern Bell Telephone Pioneers.

## Section IV. Fair Housing Analysis

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

#### Lead Agency and Service Area

The City of Little Rock is the lead agency undertaking this Analysis of Impediments to Fair Housing Choice.

#### A. SOCIO-ECONOMIC OVERVIEW

#### DEMOGRAPHICS

#### **Population Estimates**

Table IV.1, at right, shows the population for Little Rock. The population in Little Rock increased from 193,524 persons in 2010 to 197,312 persons in 2019, or by 2.0 percent. This is illustrated in Diagram IV.1, on the following page.

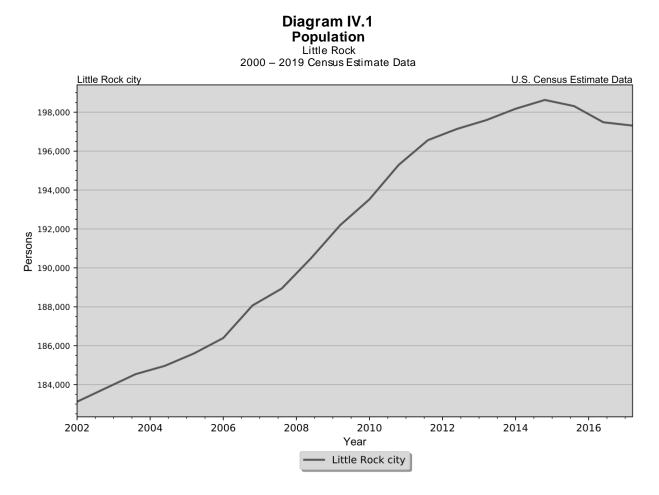
#### **Census Demographic Data**

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

To study these important concepts the Census Bureau distributes the American Community Survey every year to a sample of the population and quantifies the results as one-, three- and five-year averages. The one-year

	Table IV.1Population EstimatesLittle RockCensus Population Estimates					
Year	Population	Percent Yearly Change				
2000	183,123					
2001	183,832	0.4%				
2002	184,538	0.4%				
2003	184,965	0.2%				
2004	185,604	0.3%				
2005	186,396	0.4%				
2006	188,069	0.9%				
2007	188,937	0.5%				
2008	190,492	0.8%				
2009	192,196	0.9%				
2010	193,524	0.7%				
2011	195,292	0.9%				
2012	196,564	0.7%				
2013	197,143	0.3%				
2014	197,595	0.2%				
2015	198,178	0.3%				
2016	198,631	0.2%				
2017	198,314	-0.2%				
2018	197,484	-0.4%				
2019	197,312	-0.1%				

sample only includes responses from the year the survey was implemented, while the five-year sample includes responses over a five-year period. Since the five-year estimates include more responses, the estimates can be tabulated down to the Census tract level, and considered more robust than the one or three year sample estimates. The American Community Survey (ACS) data used in this report is primarily the 2015-2019 Five-Year ACS, which will be referred to as the 2019 Five-Year ACS or 2019 ACS.



#### **Population Estimates**

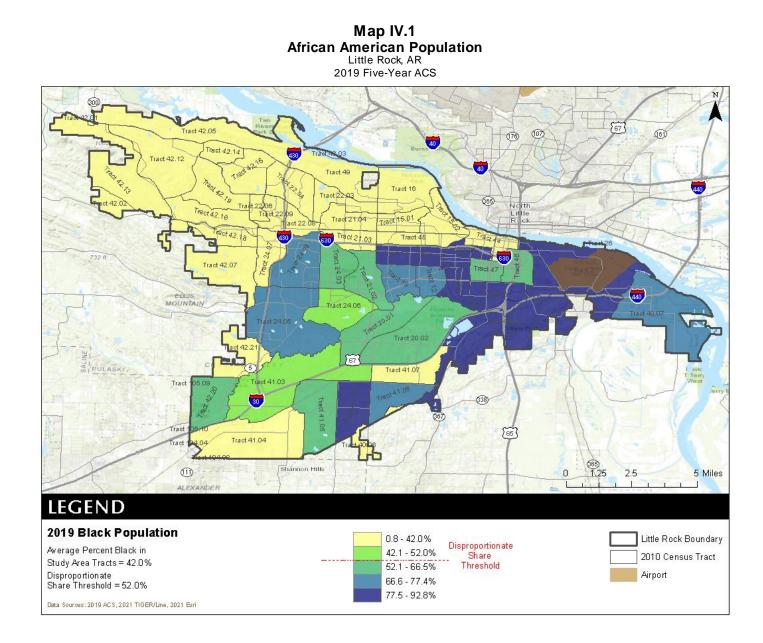
Population by race and ethnicity through 2019 is shown in Table IV.2. The white population represented 50.3 percent of the population in 2019, compared with African American populations accounting for 42.0 percent of the population in 2019. Hispanic households represented 7.4 percent of the population in 2019. There has not been a significant change in the racial and ethnic makeup of the City during this growth.

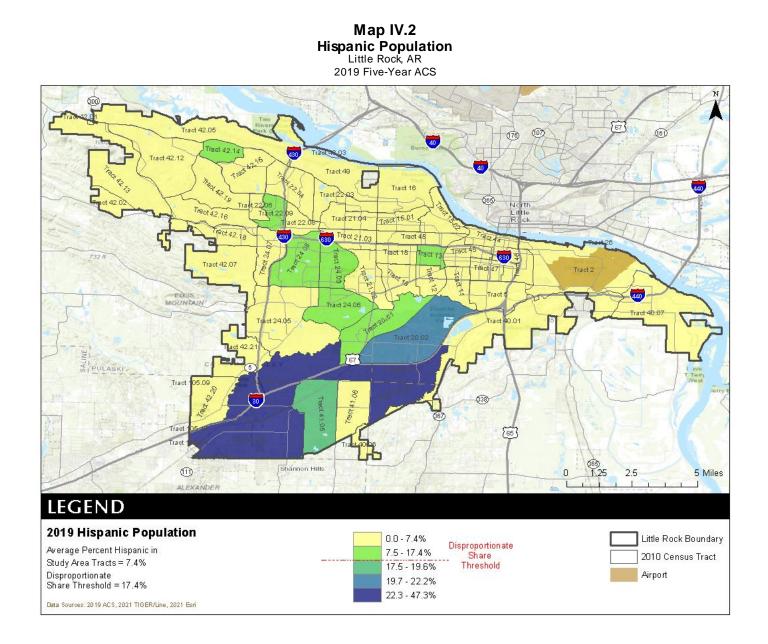
Table IV.2         Population by Race and Ethnicity         Little Rock         2010 Census & 2019 Five-Year ACS					
Race	2010 Ce	ensus	2019 Five	-Year ACS	
Nace	Population	% of Total	Population	% of Total	
White	94,665	48.9%	99,550	50.3%	
African American	81,889	42.3%	83,216	42.0%	
American Indian/Alaskan Native	686	0.4%	612	0.3%	
Asian	5,131	2.7%	6,530	3.3%	
Native Hawaiian/Pacific Islander	153	0.1%	101	0.1%	
Other	7,626	3.9%	3,486	1.8%	
Two or More Races	3,374	1.7%	4,463	2.3%	
Total 193,524 100.0% 197,958 100.0%					
Non-Hispanic	180,448	93.2%	183,255	92.6%	
Hispanic	13,076	6.8%	14,703	7.4%	

The change in race and ethnicity between 2010 and 2019 is shown in Table IV.3. During this time, the total non-Hispanic population was 183,255 persons in 2019. The Hispanic population was 14,703.

Table IV.3Population by Race and EthnicityLittle Rock2010 Census & 2019 Five-Year ACS					
Race	2010 0	ensus	2019 Five	e-Year ACS	
Nace	Population	% of Total	Population	% of Total	
	Non-H	ispanic			
White	90,297	50.0%	89,360	48.8%	
African American	81,572	45.2%	83,081	45.3%	
American Indian/Alaskan Native	519	0.3%	417	0.2%	
Asian	5,098	2.8%	6,460	3.5%	
Native Hawaiian/ Pacific Islander	54	0%	55	0%	
Other	277	0.2%	587	0.3%	
Two or More Races	2,631	1.5%	3,295	1.8%	
Total Non-Hispanic	180,448	100.0%	183,255	100.0%	
	Hisp	panic			
White	4,368	33.4%	10,190	69.3%	
African American	317	2.4%	135	0.9%	
American Indian/Alaskan Native	167	1.3%	195	1.3%	
Asian	33	0.3%	70	0.5%	
Native Hawaiian/ Pacific Islander	99	0.8%	46	0.3%	
Other	7,349	56.2%	2,899	19.7%	
Two or More Races	743	5.7%	1,168	7.9%	
Total Hispanic	13,076	100.0	14,703	100.0%	
Total Population	193,524	100.0%	197,958	100.0%	

The African American population is concentrated in eastern Little Rock, as shown in Map IV.1, on the following page. In these areas of the City, the African American population rate is over 77 percent. Hispanic households are concentrated in southern Little Rock, with population at rates over 22 percent, compared to the 7.4 percent jurisdiction average.





The group quarters population was 4,543 in 2010, compared to 4,915 in 2000. Institutionalized populations experienced a 0.3 percent change between 2000 and 2010. Non-Institutionalized populations experienced a -17.7 percent change during this same time period.

	Group Q	Table IV.4 uarters Pop Little Rock 2010 Census Sl			
Group Quarters Type	2000 C	ensus	2010 C	ensus	% Change
Group Quarters Type	Population	% of Total	Population	% of Total	00–10
	In	stitutionalized			
Correctional Institutions	1,256	45.3%	1,144	41.1%	-8.9%
Juvenile Facilities			226	8.1%	
Nursing Homes	1,026	37.0%	1,074	38.6%	4.7%
OtherInstitutions	492	17.7%	337	12.1%	-31.5%
Total	2,774	100.0%	2,781	100.0%	0.3%
	Non	-Institutionaliz	ed		
College Dormitories	652	30.5%	692	39.3%	6.1%
Military Quarters	0	0%	0	0%	0%
Other Non -Institutionalized	1,489	69.5%	1,070	60.7%	-28.1%
Total	2,141	100.0%	1,762	100.0%	-17.7%
Group Quarters Population	4,915	100.0%	4,543	100.0%	-7.6%

The number of foreign born persons is shown in Table IV.5. An estimated 2.3 percent of the population was born in Mexico, while 1.0 percent were born in India, and another 0.4 percent were born in China, excluding Hong Kong and Taiwan.

Table IV.5         Place of Birth for the Foreign-Born Population         Little Rock         2019 Five-Year ACS					
Number	Country	Number of Persons	Percent of Total Population		
#1 country of origin	Mexico	4,471	2.3%		
#2 country of origin	India	1,899	1.0%		
#3 country of origin	China, excluding Hong Kong and Taiwan	807	0.4%		
#4 country of origin	Guatemala	751	0.4%		
#5 country of origin	El Salvador	693	0.4%		
#6 country of origin	Philippines	397	0.2%		
#7 country of origin	Korea	395	0.2%		
#8 country of origin	Pakistan	389	0.2%		
#9 country of origin	Honduras	371	0.2%		
#10 country of origin	Jordan	340	0.2%		

Limited English Proficiency and the language spoken at home are shown in Table IV.6. An estimated 3.3 percent of the population speaks Spanish at home, followed by 0.4 percent speaking Chinese.

Table IV.6Limited English Proficiency and Language Spoken at HomeLittle Rock2019 Five-Year ACS					
Number	Country	Number of Persons	Percent of Total Population		
#1 LEP Language	Spanish	6,057	3.3%		
#2 LEP Language	Chinese	715	0.4%		
#3 LEP Language	Other Indo-European languages	622	0.3%		
#4 LEP Language	Arabic	311	0.2%		
#5 LEP Language	Other Asian and Pacific Island languages	282	0.2%		
#6 LEP Language	Korean	168	0.1%		
#7 LEP Language	Vietnamese	138	0.1%		
#8 LEP Language	Other and unspecified languages	128	0.1%		
#9 LEP Language	German or other West Germanic languages	117	0.1%		
#10 LEP Language	Tagalog	77	0%		

#### Cohorts

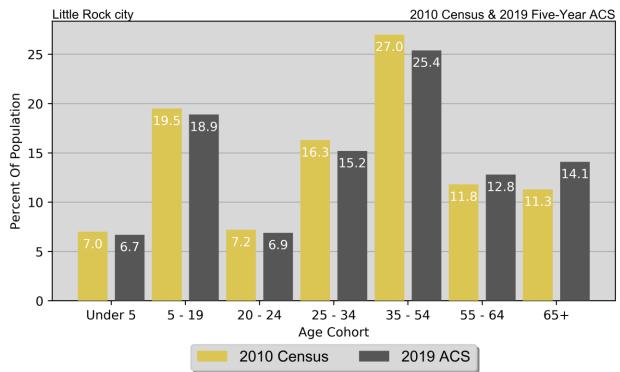
Table IV.7 shows the population distribution in Little Rock by age. In 2010, children under the age of 5 accounted for 7.0 percent of the total population, which compared to 6.7 percent in 2019. The overall population is aging, as those aged 55 and older are growing at a faster rate than any other age group in the City. As the population ages, there are considerations to consider in the housing and service needs for elderly households in the coming years.

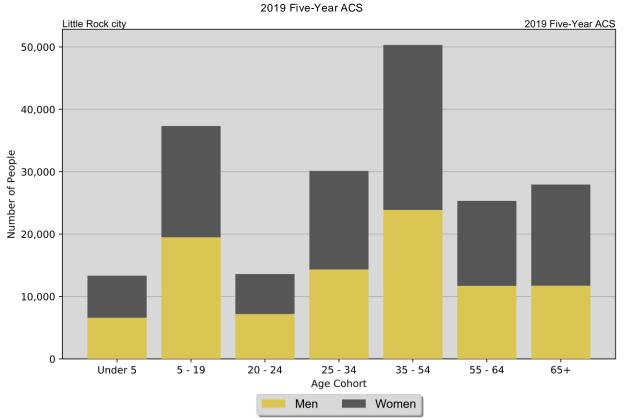
	Table IV.7         Population Distribution by Age         Little Rock         2019 Five-Year ACS Data					
A	2010 Censu	s	2019 Five-Year	ACS		
Age	Number of Persons	Percent	Number of Persons	Percent		
Under 5	13,462	7.0	13,333	6.7		
5 to 19	37,803	19.5	37,327	18.9		
20 to 24	13,838	7.2	13,591	6.9		
25 to 34	31,471	16.3	30,123	15.2		
35 to 54	52,235	27.0	50,318	25.4		
55 to 64	22,799	11.8	25,325	12.8		
65 or Older	21,916	11.3	27,941	14.1		
Total	193,524	100%	197,958	100%		

Table IV.8 shows the population in Little Rock by age and gender. In 2010, there were 31,471 people aged 25 to 34, consisting of 15,350 men, and 16,121 women. In comparison, in 2019, there were 30,123 people in the 25 to 34 age cohort, with 14,331 men and 15,792 women.

Table IV.8         Population by Age and Gender         Little Rock         2010 Census & 2019 Five-Year ACS Data								
100		2010 C	ensus			2019 Fiv	e Year ACs	
Age	Male	Female	Total	Percent	Male	Female	Total	Percent
Under 5	6,844	6,618	13,462	7.0%	6,603	6,730	13,333	6.7%
5 to 19	19,068	18,735	37,803	19.5%	19,497	17,830	37,327	18.9%
20 to 24	6,804	7,034	13,838	7.2%	7,196	6,395	13,591	6.9%
25 to 34	15,350	16,121	31,471	16.3%	14,331	15,792	30,123	15.2%
35 to 54	24,908	27,327	52,235	27.0%	23,878	26,440	50,318	25.4%
55 to 64	10,678	12,121	22,799	11.8%	11,698	13,627	25,325	12.8%
65 and Older	8,593	13,323	21,916	11.3%	11,736	16,205	27,941	14.1%
Total	92,245	101,279	193,524	100%	94,939	103,019	197,958	100%

# Diagram IV.2 Population Distribution by Age Little Rock 2010 Census and 2019 Five-Year ACS Data





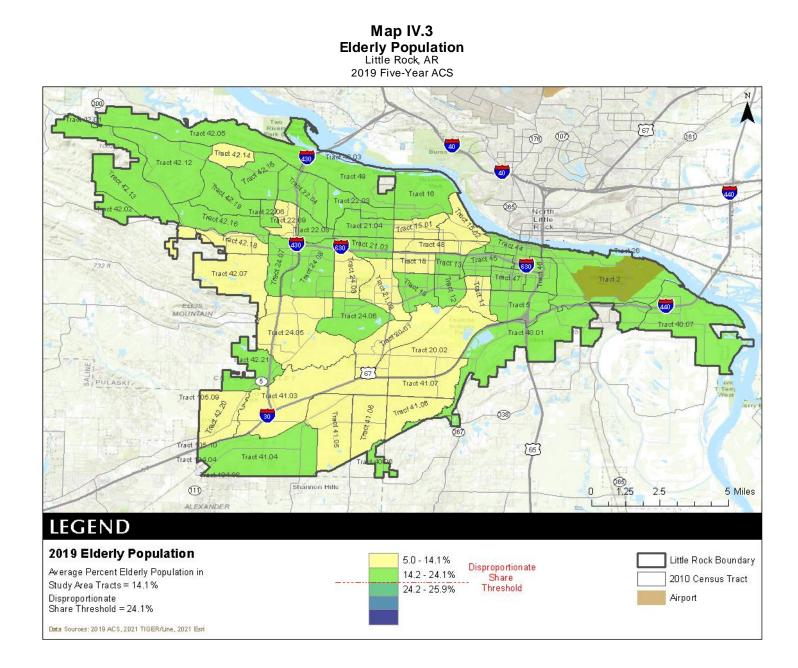
#### Diagram IV.3 Population Distribution by Age and Gender Little Rock

As seen in Map IV.3, the elderly population is not concentrated in areas in the City.

#### **Education and Employment**

Employment data, as estimated by the 2019 ACS, is presented in Table IV.19. In 2019, 98,444 persons were employed and 4,183 were unemployed. This totaled a labor force of 102,627 persons. The unemployment rate for Little Rock was estimated to be 4.1 percent in 2019.

Table IV.9Employment, Labor Force and UnemploymentLittle Rock2019 Five-Year ACS Data				
Employment Status	2019 Five-Year ACS			
Employed	98,444			
Unemployed	4,183			
Labor Force	102,627			
Unemployment Rate	4.1%			



In 2019, 90.5 percent of households in Little Rock had a high school education or greater.

Table IV.10         High School or Greater Education         Little Rock         2019 Five-Year ACS Data		
Education Level	Households	
High School or Greater	137,257	
Total Households	81,987	
Percent High School or Above	90.5%	

An estimated 23.3 percent of the population had a high school diploma or equivalent, another 28.2 percent have some college, 22.8 percent have a Bachelor's Degree, and 16.2 percent of the population had a graduate or professional degree.

Table IV.11         Educational Attainment         Little Rock         2019 Five-Year ACS Data				
Education Level	Population	Percent		
Less Than High School	14,431	9.5%		
High School or Equivalent	35,356	23.3%		
Some College or Associates Degree	42,703	28.2%		
Bachelor'sDegree	34,640	22.8%		
Graduate or Professional Degree	24,558	16.2%		
Total Population Above 18 years	151,688	100.0%		

#### Summary

While the population in the City of Little Rock has grown by 2.0 percent between 2010 and 2019, the racial and ethnic makeup of the area is not changing significantly. However, there are areas in the City that have high concentrations of African American and Hispanic residents, particularly in central Little Rock. Limited English Proficiency includes an estimated 3.3 percent of the population speaks Spanish at home, followed by 0.4 percent speaking Chinese. The population in Little Rock is aging, as those aged 55 and older are increasing as a percentage of the population. In 2019, some 23.3 percent of the population had a high school diploma or equivalent, another 28.2 percent have some college, 22.8 percent have a Bachelor's Degree, and 16.2 percent of the population had a graduate or professional degree.

#### **ECONOMICS**

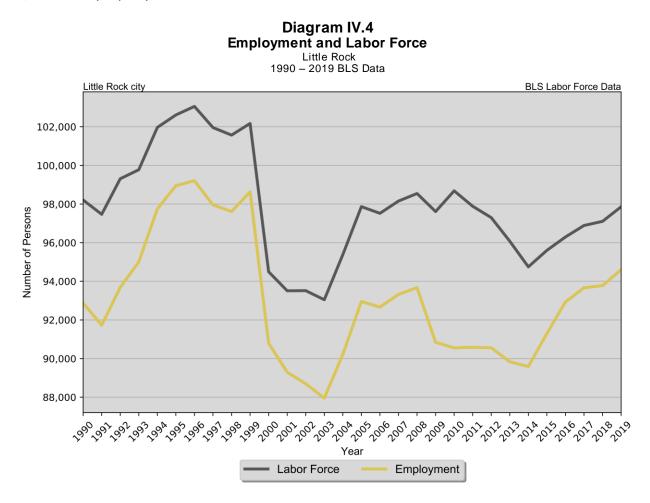
The following section describes the economic context for the City of Little Rock. The data presented here is from the Bureau of Economic Analysis (BEA) and the Bureau of Labor Statistics (BLS). The data from the BEA is only available at the County level and shows the entirety of Pulaski County. The BLS data presented below is specified for the City of Little Rock.

#### Labor Force

Table IV.12 shows the labor force statistics for Little Rock from 1990 to the present. Over the entire series the lowest unemployment rate occurred in 2017 with a rate of 3.3 percent. The highest level of unemployment occurred during 2010 rising to a rate of 8.2 percent. This compared to a statewide low of 3.5 in 2019 and statewide high of 8.3 percent in 2011. Over the last year, the unemployment rate in Little Rock decreased from 3.4 percent in 2018 to 3.3 percent in 2019, which compared to a statewide decrease to 3.5 percent.

Table IV.12         Labor Force Statistics         Little Rock         1990 – 2019 BLS Data							
	Little Rock						
Year	Unemployment	Employment	Labor Force	Unemployment Rate	Statewide Unemployment Rate		
1990	5,336	92,873	98,209	5.4%	6.9%		
1991	5,743	91,724	97,467	5.9%	7.4%		
1992	5,623	93,685	99,308	5.7%	7.1%		
1993	4,772	95,004	99,776	4.8%	6.1%		
1994	4,223	97,743	101,966	4.1%	5.4%		
1995	3,661	98,951	102,612	3.6%	4.8%		
1996	3,847	99,207	103,054	3.7%	5.3%		
1997	4,007	97,952	101,959	3.9%	5.2%		
1998	3,957	97,612	101,569	3.9%	5.2%		
1999	3,546	98,625	102,171	3.5%	4.6%		
2000	3,699	90,794	94,493	3.9%	4.3%		
2001	4,215	89,294	93,509	4.5%	5.0%		
2002	4,820	88,695	93,515	5.2%	5.5%		
2003	5,092	87,954	93,046	5.5%	5.9%		
2004	5,165	90,219	95,384	5.4%	5.7%		
2005	4,912	92,953	97,865	5.0%	5.2%		
2006	4,854	92,666	97,520	5.0%	5.2%		
2007	4,833	93,321	98,154	4.9%	5.3%		
2008	4,874	93,671	98,545	4.9%	5.5%		
2009	6,767	90,843	97,610	6.9%	7.8%		
2010	8,133	90,550	98,683	8.2%	8.2%		
2011	7,300	90,584	97,884	7.5%	8.3%		
2012	6,742	90,555	97,297	6.9%	7.6%		
2013	6,241	89,833	96,074	6.5%	7.2%		
2014	5,157	89,591	94,748	5.4%	6.0%		
2015	4,307	91,296	95,603	4.5%	5.0%		
2016	3,362	92,932	96,294	3.5%	4.0%		
2017	3,223	93,666	96,889	3.3%	3.7%		
2018	3,331	93,773	97,104	3.4%	3.6%		
2019	3,255	94,602	97,857	3.3%	3.5%		

Diagram IV.4 shows the employment and labor force for Little Rock. The difference between the two lines represents the number of unemployed persons. In the most recent year, employment stood at 94,602 persons, with the labor force reaching 97,857, indicating there were a total of 3,255 unemployed persons.



#### Unemployment

Diagram IV.5 shows the unemployment rate for both the State and Little Rock. During the 1990's the average rate for Little Rock was 4.4 percent, which compared to 5.8 percent statewide. Between 2000 and 2010 the unemployment rate had an average of 5.1 percent, which compared to 5.5 percent statewide. Since 2010, the average unemployment rate was 5.3 percent. Over the course of the entire period Little Rock had an average unemployment rate that lower than the State, 4.9 percent for Little Rock, versus 5.7 statewide.

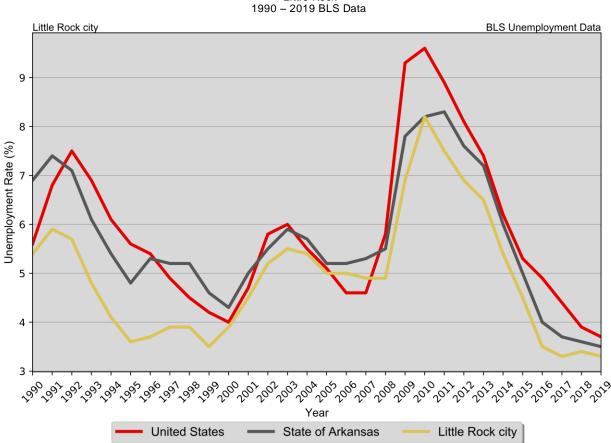


Diagram IV.5 Annual Unemployment Rate Little Rock 1990 – 2019 BLS Data

#### **Employment**

Table IV.13 shows employment and median earnings by industry for Little Rock from the 2019 Five-Year ACS. In 2019 the largest industry by number of people employed in Little Rock was Health Care, which employed 15,759 people and paid a median salary of 43,882 dollars. The highest paying industry in Little Rock was the Mining industry, which paid a median salary of 90,197 dollars in 2019.

Table IV.13           City Level Employment by Industry           Little Rock							
Little Rock 2019 Five Year ACS Data							
Industry	Total Employment	Percent of Employment	Median Earnings				
Admin	3,272	4.0%	\$31,765				
Arts	775	1.0%	\$40,739				
Construction	3,355	4.0%	\$39,360				
Education	6,121	8.0%	\$49,727				
Farming	156	0%	\$34,085				
Finance	5,004	7.0%	\$54,663				
Food	3,418	5.0%	\$22,711				
Health Care	15,759	21.0%	\$43,882				
Info	2,593	4.0%	\$48,669				
Management	70	0%	\$48,036				
Manufacturing	5,268	7.0%	\$41,844				
Mining	103	0%	\$90,197				
Other	3,100	4.0%	\$40,115				
Prof Service	5,440	7.0%	\$70,173				
Government	5,226	7.0%	\$49,078				
Real Estate	1,023	1.0%	\$54,250				
Retail	7,418	10.0%	\$31,333				
Transport	2,945	4.0%	\$49,594				
Utilities	689	1.0%	\$74,659				
Wholesale	2,065	3.0%	\$43,397				

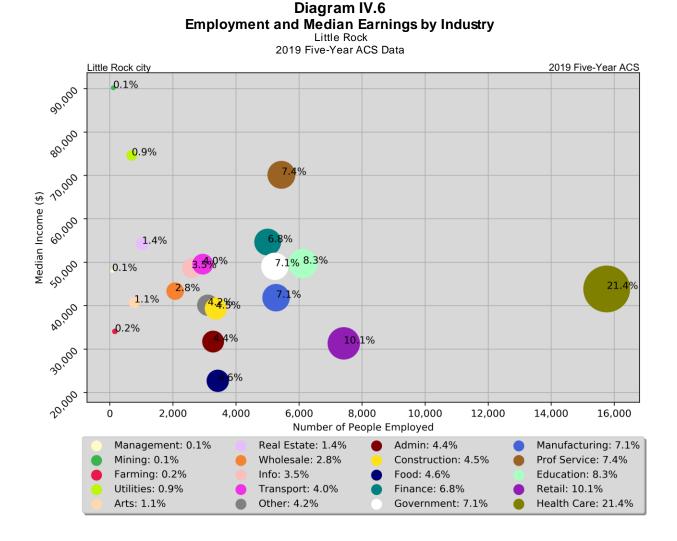


Diagram IV.6 displays employment and earnings data for 2019 in Little Rock.

#### Earnings: Pulaski County

The Bureau of Economic Analysis (B.E.A.) produces regional economic accounts, which provide a consistent framework for analyzing and comparing individual state and local area economies. Diagram IV.7 shows real average earnings per job for Pulaski County from 1990 to 2019. Over this period the average earning per job for Pulaski County was 54,881 dollars, which was higher than the statewide average of 44,345 dollars over the same period.

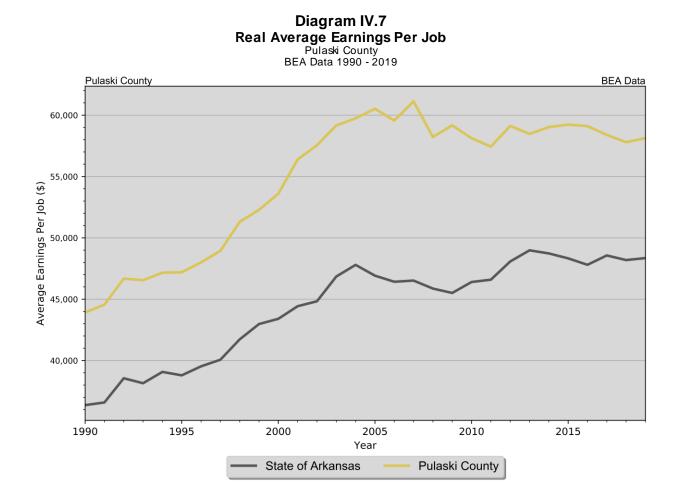
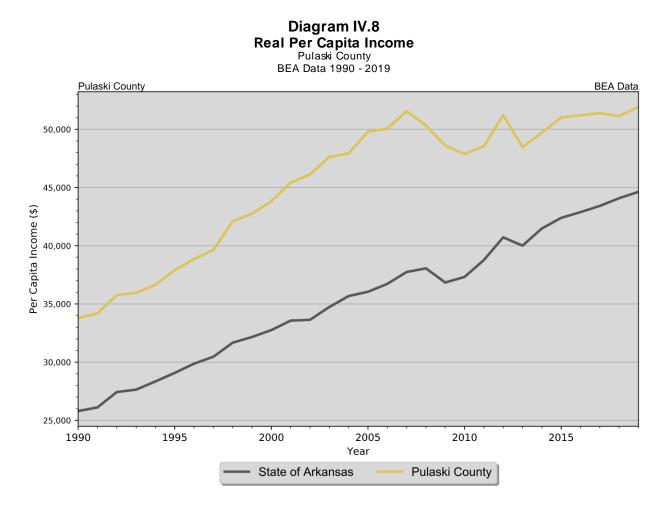


Diagram IV.8 shows real per capita income for the Pulaski County from 1990 to 2019, which is calculated by dividing total personal income from all sources by population. Per capita income is a broader measure of wealth than real average earnings per job, which only captures the working population. Over this period, the real per capita income for Pulaski County was 45,380 dollars, which was higher than the statewide average of 35,337 dollars over the same period.



#### Poverty

The rate of poverty for Little Rock is shown in Table IV.14. In 2019, there were an estimated 32,408 persons living in poverty. This represented a 16.6 percent poverty rate, compared to 14.3 percent poverty in 2000. In 2019, approximately 24.5 percent of those in poverty were under age 6, and 10.9 percent were 65 or older.

Table IV.14Poverty by AgeLittle Rock2000 Census SF37 & 2019 Five-Year ACS Data						
A.c.o.	2000 Censu	ıs	2019 Five-Yea	r ACS		
Age	Persons in Poverty	% of Total	Persons in Poverty	% of Total		
Under6	3,537	13.8%	3,884	24.5%		
6 to 17	5,994	23.4%	6,962	23.4%		
18 to 64	14,237	55.6%	18,623	15.2%		
65 or Older	1,853	7.2%	2,939	10.9%		
Total	25,621 100.0% 32,408 100.0%					
Poverty Rate	14.3%	-	16.6%	-		

#### Summary

In 2019, unemployment in the City of Little Rock was at 3.3 percent, compared to 3.5 percent for the State of Arkansas. This is representative of a labor force of 97,857 people and 94,602 people employed. Real per capita income in Pulaski County has remained higher than the state rate in recent years. However, poverty has grown to 16.6 percent, representing 32,408 persons living in poverty in the City.

<sup>&</sup>lt;sup>7</sup> Single File 3

## HOUSING

#### **Housing Production**

The Census Bureau reports building permit authorizations and "per unit" valuation of building permits by city annually. Single-family construction usually represents most residential development in the county. Single-family building permit authorizations in Little Rock increased from 325 authorizations in 2018 to 480 in 2019.

The real value of single-family building permits decreased from 324,842 dollars in 2018 to 265,234 dollars in 2019. This compares to an increase in permit value statewide, with values rising from 215,318 dollars in 2018 to 218,151 dollars in 2019. Additional details are given in Table IV.15.

Table IV.15         Building Permits and Valuation         Little Rock									
	Census Bureau Data, 1980–2019 Per Unit Valuation, (Real 2019\$)								
Year	Single- Family	Duplex Units	Tri- and Four-Plex	Multi-Family Units	Total Units	Single-Family Units	Multi-Family Units		
1980	418	8	44	371	841	183,792	89,503		
1981	260	2	59	289	610	154,228	70,004		
1982	203	18	19	1.085	1.325	166.509	59.633		
1983	508	22	104	1,862	2,496	152,978	56,098		
1984	533	0	21	1,477	2,031	151,196	72,047		
1985	665	14	40	717	1,436	168,799	57,474		
1986	696	4	6	1,241	1,947	203,957	47,080		
1987	625	2	0 0	8	635	173,231	206,815		
1988	473	4	õ	8	485	206,783	28,539		
1989	490	0	õ	Õ	490	179,676	0		
1990	446	26	õ	Õ	472	197,783	Õ		
1991	458	0	0 0	0	458	222,118	Õ		
1992	620	0	0	0	620	238,783	0		
1993	749	6	4	64	823	244,018	58,587		
1994	640	14	7	0	661	271,761	0		
1994	486	0	7	401	894	252,648	49,324		
1995	473	2	12	0	487	249,020	49,324		
1990	440	6	0	1,147	1.593	234,889	54,714		
1997	440	0	66	631	1,188	270.165	52,217		
1998	491 552	0	0	566	·	-,	·		
2000	515	2	105	101	1,118 723	271,507	47,750		
						286,776	71,250		
2001	544	10 2	8 28	6	568	285,058	79,790		
2002	591			207	828	321,395	70,220		
2003	725	0	19	283	1,027	328,880	58,917		
2004	805	0	7 4	1,006	1,818	342,531	62,712		
2005	990	8		191	1,193	328,101	165,975		
2006	827	0	3	0	830	304,053	0		
2007	731	0	0	416	1,147	280,549	188,625		
2008	361	0	23	254	638	281,743	77,417		
2009	329	4	0	324	657	265,571	39,774		
2010	344	30	4	50	428	228,687	67,337		
2011	325	20	71	913	1,329	228,767	73,405		
2012	347	12	50	261	670	255,815	89,629		
2013	356	10	0	242	608	295,544	104,848		
2014	338	20	14	407	779	293,296	95,980		
2015	332	16	0	422	770	280,782	53,648		
2016	330	22	0	479	831	307,039	83,268		
2017	592	20	0	488	1,100	228,096	71,571		
2018	325	12	3	130	470	324,842	148,582		
2019	480	4	0	535	1,019	265,234	89,716		

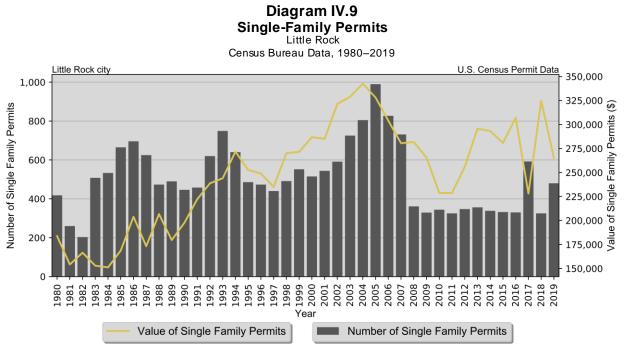
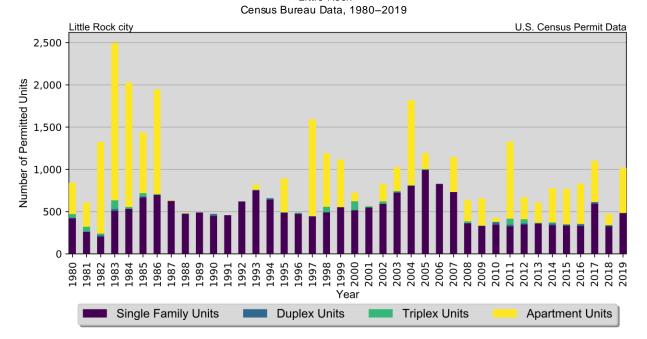


Diagram IV.10 Total Permits by Unit Type Little Rock



35

#### **Housing Characteristics**

Households type by tenure are shown in Table IV.16. Family households represented 56.9 percent of households, while non-family households accounted for 43.1 percent. These changed from 58.3 percent and 41.7 percent, respectively.

Table IV.16         Household Type by Tenure         Little Rock         2010 Census SF1 & 2019 Five-Year ACS Data						
Household Type	2010	Census	2019 Fiv	e-Year ACS		
	Households	Households	Households	% of Total		
Family Households	47,799	58.3%	46,636	56.9%		
Married-Couple Family	29,978	62.7%	29,162	62.5%		
Owner-Occupied	23,833	79.5%	23,249	79.7%		
Renter-Occupied	6,145	20.5%	5,913	20.3%		
Other Family	17,821	37.3%	17,474	38.2%		
Male Householder, No Spouse Present	3,495	19.6%	3,490	20.0%		
Owner-Occupied	1,633	46.7%	1,508	43.2%		
Renter-Occupied	1,862	53.3%	1,982	56.8%		
Female Householder, No Spouse Present	14,326	80.4%	13,984	82.0%		
Owner-Occupied	5,937	41.4%	5,364	38.4%		
Renter-Occupied	8,389	58.6%	8,620	61.6%		
Non-Family Households	34,219	41.7%	35,351	43.1%		
Owner-Occupied	14,675	42.9%	15,234	43.1%		
Renter-Occupied	19,544	57.1%	20,117	56.9%		
Total	82,018	100.0%	81,987	100.0%		

Table IV.17 below shows housing units by type in 2010 and 2019. In 2010, there were 90,096 housing units, compared with 96,339 in 2019. Single-family units accounted for 64.1 percent of units in 2019, compared to 65.9 in 2010. Apartment units accounted for 27.6 percent in 2019, compared to 24.7 percent in 2010.

Table IV.17         Housing Units by Type         Little Rock         2010 & 2019 Five-Year ACS Data						
Unit Type	2010 Fiv	ve-Year ACS	2019 Fiv	/e-Year ACS		
	Units % of Total		Units	% of Total		
Single-Family	59,372	65.9%	61,792	64.1%		
Duplex	2,404	2.7%	2,570	2.7%		
Tri-or Four-Plex	3,814	4.2%	3,776	3.9%		
Apartment	22,278	24.7%	26,627	27.6%		
MobileHome	2,218	2.5%	1,540	1.6%		
Boat, RV, Van, Etc.	10	0%	34	0%		
Total	90,096	100.0%	96,339	100.0%		

Table IV.18 shows housing units by tenure from 2010 to 2019. By 2019, there were 96,339 housing units. An estimated 55.3 percent were owner-occupied, and 14.9 percent were vacant.

Table IV.18         Housing Units by Tenure         Little Rock         2010 Census & 2019 Five-Year ACS Data						
Tomuro	2010	Census	2019 Five	-Year ACS		
Tenure	Units	% of Total	Units	% of Total		
Occupied Housing Units	82,018	89.8%	81,987	85.1%		
Owner-Occupied	46,078	56.2%	45,355	55.3%		
Renter-Occupied	35,940	43.8%	36,632	44.7%		
Vacant Housing Units 9,270 10.2% 14,352 14.9%						
Total Housing Units	91,288	100.0%	96,339	100.0%		

Households by income for the 2010 and 2019 5-year ACS are shown in Table IV.19. Households earning more than 100,000 dollars per year represented 24.3 percent of households in 2019, compared to 17.7 percent in 2010. Meanwhile, households earning less than 15,000 dollars accounted for 12.7 percent of households in 2019, compared to 14.9 percent in 2000.

Table IV.19         Households by Income         Little Rock         2010 & 2019 Five-Year ACS Data						
Income	2010 Five-`	Year ACS	2019 Fiv	e-Year ACS		
lincome	Households	% of Total	Households	% of Total		
Less than \$15,000	11,852	14.9%	10,401	12.7%		
\$15,000 to \$19,999	4,997	6.3%	4,136	5.0%		
\$20,000 to \$24,999	4,567	5.7%	4,901	6.0%		
\$25,000 to \$34,999	9,839	12.4%	8,512	10.4%		
\$35,000 to \$49,999	12,825	16.1%	12,053	14.7%		
\$50,000 to \$74,999	13,202	16.6%	13,547	16.5%		
\$75,000 to \$99,999	8,149	10.3%	8,555	10.4%		
\$100,000 or More	14,058	17.7%	19,882	24.3%		
Total	79,489	100.0%	81,987	100.0%		

Table IV.20 shows households by year home built for the 2010 and 2019 5-year ACS data. Housing units built between 2000 and 2009, account for 10.0 percent of households in 2010 and 11.9 percent of households in 2019. Housing units built in 1939 or earlier represented 6.9 percent of households in 2019 and 7.9 percent of households in 2010.

Table IV.20         Households by Year Home Built         Little Rock         2010 & 2019 Five-Year ACS Data						
Year Built	2010 Five-`	Year ACS	2019 Five-Y	'ear ACS		
Tear Duin	Households	% of Total	Households	% of Total		
1939 or Earlier	6,312	7.9%	5,625	6.9%		
1940 to 1949	4,045	5.1%	3,818	4.7%		
1950 to 1959	8,490	10.7%	7,967	9.7%		
1960 to 1969	12,552	15.8%	12,195	14.9%		
1970 to 1979	18,029	22.7%	16,095	19.6%		
1980 to 1989	13,704	17.2%	11,693	14.3%		
1990 to 1999	8,411	10.6%	9,630	11.7%		
2000 to 2009	7,946	10.0%	9,776	11.9%		
2010 or Later			5,188	6.3%		
Total	79,489	100.0%	81,987	100.0%		

The distribution of unit types by race are shown in Table IV.21. An estimated 73.4 percent of white households occupy single-family homes, compared to 59.3 percent of African American households. In addition, 20.1 percent of white households occupied apartments, compared to 30.6 percent of African American households. An estimated 66.1 percent of Asian, and 89.6 percent of American Indian / Alaskan Native households occupy single-family homes.

Table IV.21         Distribution of Units in Structure by Race         Little Rock         2019 Five-Year ACS Data							
Unit Type	White	African American	American Indian	Asian	Native Hawaiian/Pacific Islanders	Other	Two or More Races
Single-Family	73.4%	59.3%	89.6%	66.1%	100.0%	58.7%	43.5%
Duplex	1.7%	3.6%	0%	2.4%	0%	0%	2.3%
Tri-or Four-Plex	2.8%	5.5%	0%	1.5%	0%	3.8%	4.3%
Apartment	20.1%	30.6%	10.4%	28.4%	0%	25.9%	45.7%
MobileHome	1.9%	1.0%	0%	0%	0%	11.6%	4.2%
Boat, RV, Van, Etc.	0%	0%	0%	1.5%	0%	0%	0%
Total	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

The disposition of vacant units between 2010 and 2019 are shown in Table IV.22. By 2019, for rent units accounted for 42.0 percent of vacant units, while for sale units accounted for 8.9 percent. "Other" vacant units accounted for 37.5 percent of vacant units, representing a total of 5,387 "other" vacant units. "Other" vacant units are not available to rent or for sale and are not otherwise available to the marketplace. These units may have a "blighting" effect in concentrated in any one area.

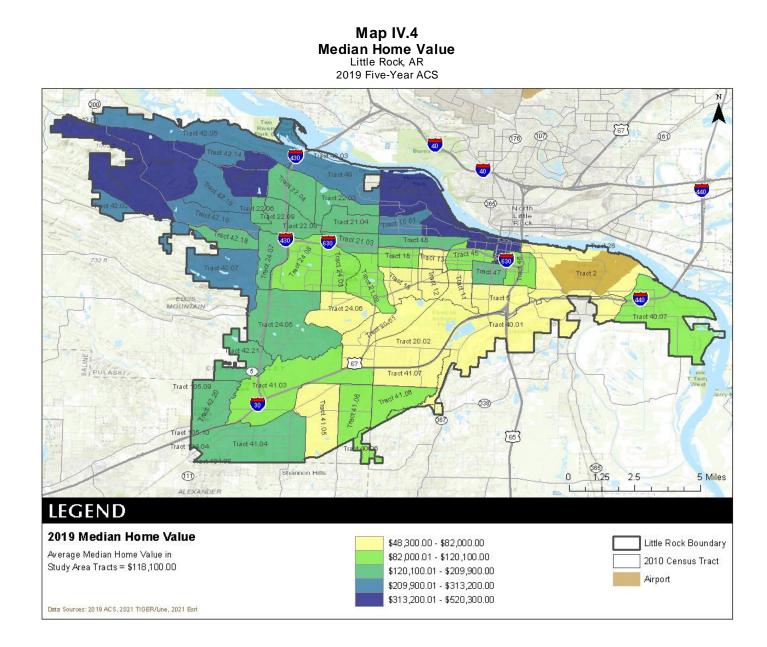
Table IV.22         Disposition of Vacant Housing Units         Little Rock         2010 Census & 2019 Five-Year ACS Data						
Disposition	2010 0	Census	2019 Five	e-Year ACS		
Disposition	Units	% of Total	Units	% of Total		
For Rent	4,475	48.3%	6,024	42.0%		
For Sale	1,279	13.8%	1,276	8.9%		
Rented Not Occupied	147	1.6%	475	3.3%		
Sold Not Occupied	252	2.7%	299	2.1%		
For Seasonal, Recreational, or Occasional Use	533	5.7%	891	6.2%		
For Migrant Workers	3	0%	0	0%		
OtherVacant	2,581	27.8%	5,387	37.5%		
Total	9,270	100.0%	14,352	100.0%		

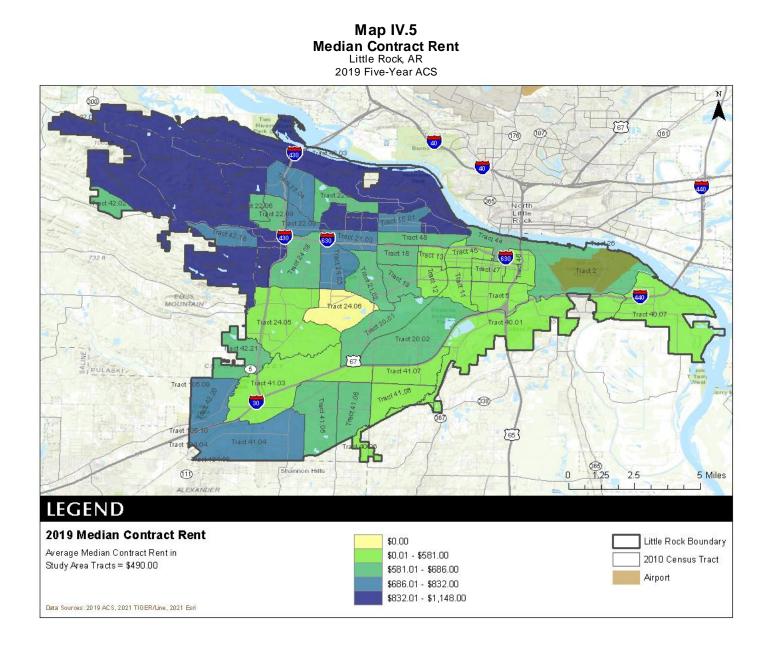
The age of a structure influences its value. As shown in Table IV.23, structures built in 1939 or earlier had a median value of \$212,100, while structures built between 1950 and 1959 had a median value of \$104,900 and those built between 1990 and 1999 had a median value of \$233,100. The newest structures tended to have the highest values and those built between 2010 and 2013 and from 2014 or later had median values of \$332,200 and \$336,300, respectively. The total median value in Little Rock was \$167,600.

Table IV.23Owner Occupied Median Value by YearStructure BuiltLittle Rock2019 Five-Year ACS Data				
Year Structure Built	Median Value			
1939 or earlier	212,100			
1940 to 1949	147,900			
1950 to 1959	104,900			
1960 to 1969	117,900			
1970 to 1979	146,300			
1980 to 1989	166,700			
1990 to 1999	233,100			
2000 to 2009	273,400			
2010 to 2013	332,200			
2014 or later	336,300			
Median Value	167,600			

Housing costs varied widely by location. The highest median home values are found in the northwestern part of Little Rock, at values exceeding \$313,200. Areas in central Little Rock saw

home values below \$82,000. A similar pattern is seen with rental prices, and is shown in Map IV.5.





#### Summary

Little Rock's housing production has remained relatively steady since 2012, with production ranging from 608 to 1,100 units annually. In 2019, there were 1,019 total units produced in the City, with 480 of these being single family units. Single family unit production declined beginning in 2008 and have increased slightly since that time. The value of single-family permits, however, continued to rise until 2018 before dropping slightly \$265,234 in 2019. Since 2010, the City has seen a slight increase in the proportion of vacant units, mainly seen in the increase in the number of "other" vacant units. Housing prices are markedly higher in northwestern Little Rock for both rental costs and home values when compared to central and southern Little Rock.

## **B. SEGREGATION AND INTEGRATION**

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

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

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

$$D_{j}^{WB} = 100 * \frac{1}{2} \sum_{i=1}^{N} \left| \frac{W_{i}}{W_{j}} - \frac{B_{i}}{B_{j}} \right|$$

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

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

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

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

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

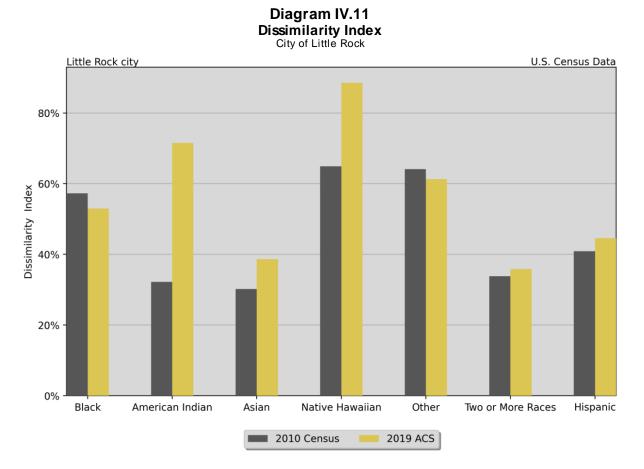
Little Rock Analysis of Impediments

<sup>&</sup>lt;sup>8</sup> Affirmatively Furthering Fair Housing Data Documentation. HUD. December 2015.

<sup>&</sup>lt;sup>9</sup> Wong, David S. "Spatial Decomposition of Segregation Indices: A Framework Toward Measuring Segregation at Multiple Levels." Geographical Analyses, 35:3. The Ohio State University. July 2003. P. 179.

#### Segregation Levels

Diagram IV.11 shows the dissimilarity index by racial type in 2010 and 2019 in Little Rock. In 2019, American Indian, Native Hawaiian, and "other" race households had moderate or high levels of segregation. However, these racial groups represent a small percentage of the population, less than one percent each. African American households had a moderate level of segregation in 2019, which declined from a high level in 2010. Hispanic households had a moderate level of segregation in both 2010 and 2019, according to the index. The highest concentrations of African American and Hispanic households are shown in Maps IV.1 and IV.2.

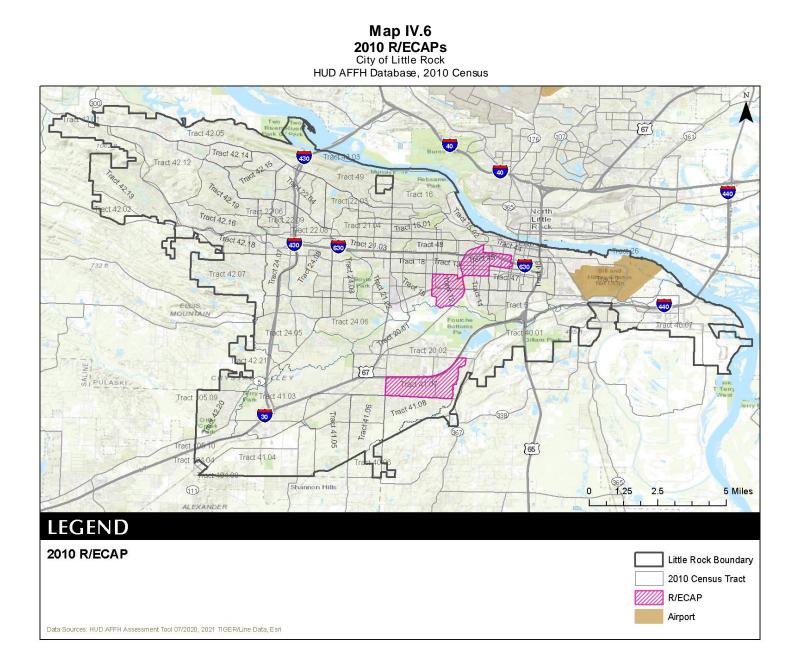


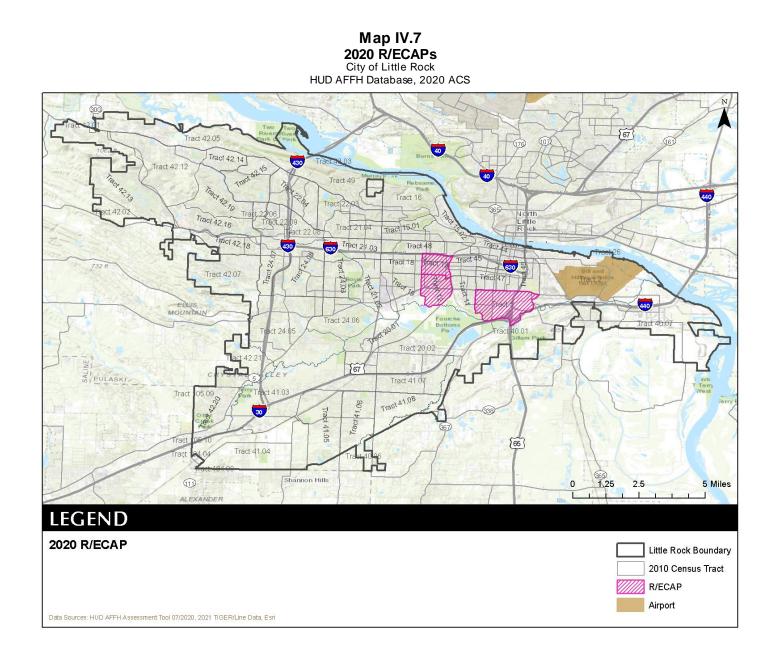
# C. RACIALLY OR ETHNICALLY CONCENTRATED AREAS OF POVERTY

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

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

The R/ECAPS in the City of Little Rock are illustrated n the maps on the following pages. The number of R/ECAPs remained the same in 2010 to 2020, but only one location remained the same. All three (3) R/ECAPs in 2020 were found in central Little Rock. These areas tended to have higher concentrations of African American households, as shown in Map IV.1. These areas also tend to have lower median home values and median contract rents.





# **D. DISPARITIES IN ACCESS TO OPPORTUNITY**

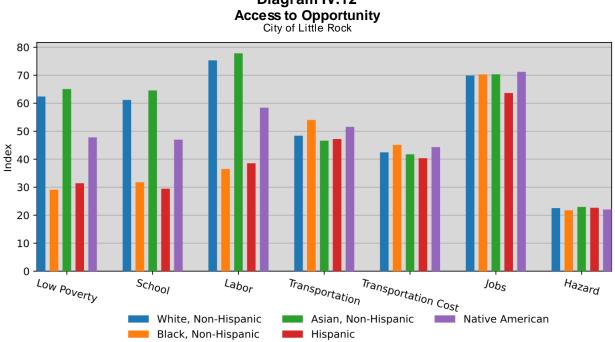
The following section describes the HUD defined terms of Access to Opportunity. These measures, as outlined below, describe a set of conditions that may or may not accurately reflect the actual conditions in the study area. These data are supplemented by local data when available and ultimately provide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

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

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

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

All the indices are presented in Diagram IV.12 for Little Rock. As seen therein, Black /African American (Non-Hispanic) and Hispanic households have a lower access to low poverty areas than white households. Black/ African American and Hispanic households also have a lower level of access to school proficiency. A similar trend is seen for labor engagement, in which black/ African American and Hispanic households have index ratings markedly lower than white non-Hispanic households. Transit trips, transportation costs, job proximity and environmental health indices are fairly even across all racial and ethnic groups.

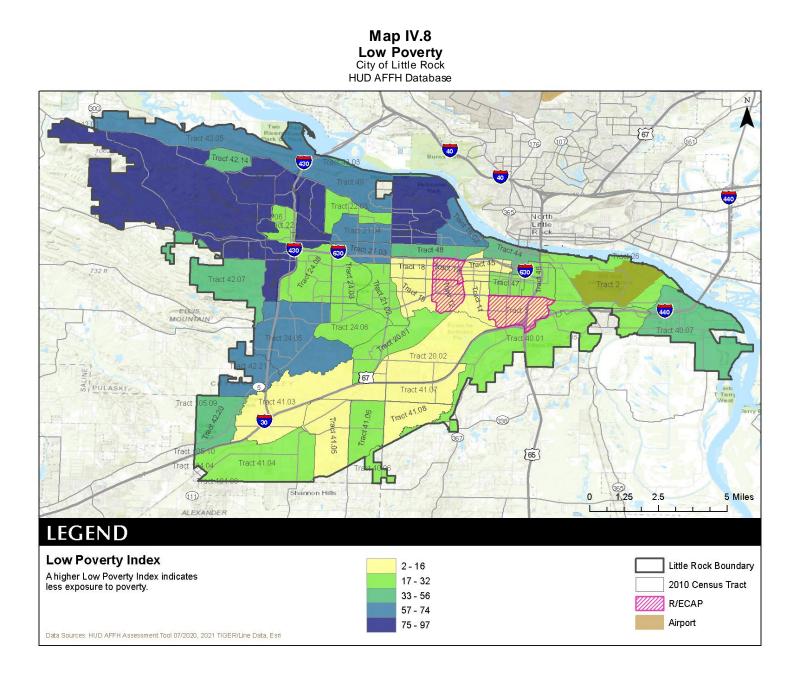


# **Diagram IV.12**

#### LOW POVERTY INDEX

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

The lowest scores were found in central and southern Little Rock, while the highest scores were found in the northwestern parts of Little Rock that are adjacent to the Interstate 430 and Interstate 630 Junction. As mentioned previously, Black/ African American and Hispanic households tended to have the lowest index ratings citywide.



#### SCHOOL PROFICIENCY INDEX

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

School Proficiency indices are highest in the northwestern areas of Little Rock, while the lowest scores were seen in southern and central Little Rock.

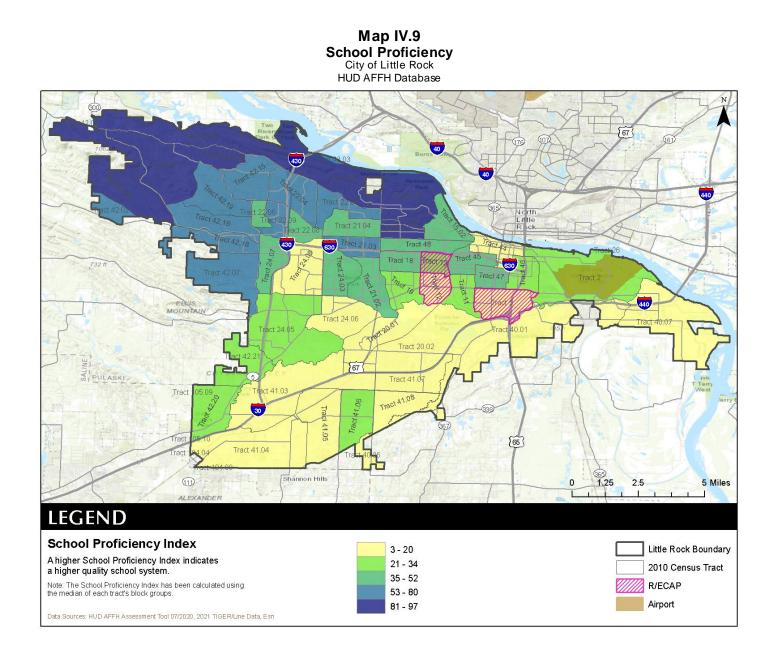
#### **JOBS PROXIMITY INDEX**

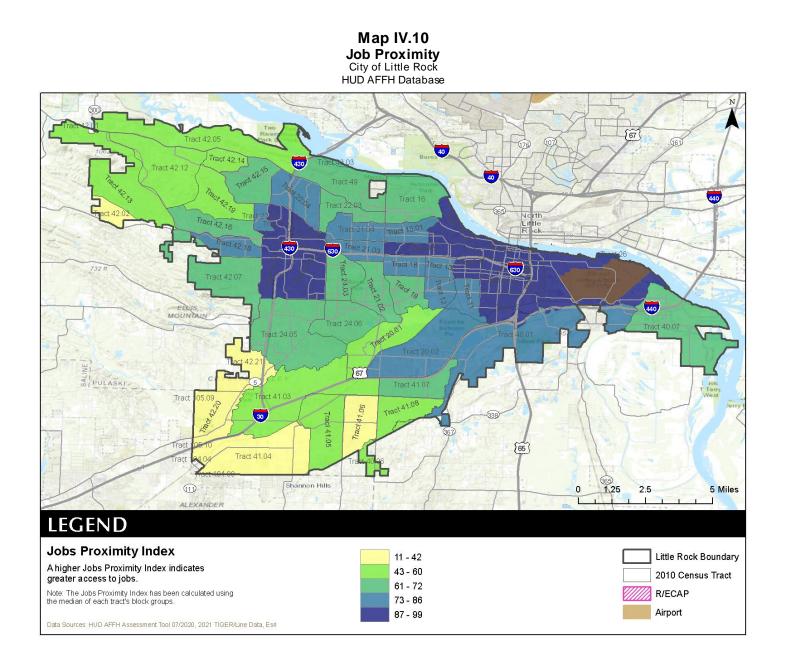
The Jobs Proximity Index measures the physical distances between place of residence and jobs by race/ethnicity and is shown in Map IV.10. Job proximity varied widely across the City. As one would expect, the areas closest to the city center had the highest job proximity index ratings, as well as the area adjacent to the Interstate 430 and Interstate 630 Junction.

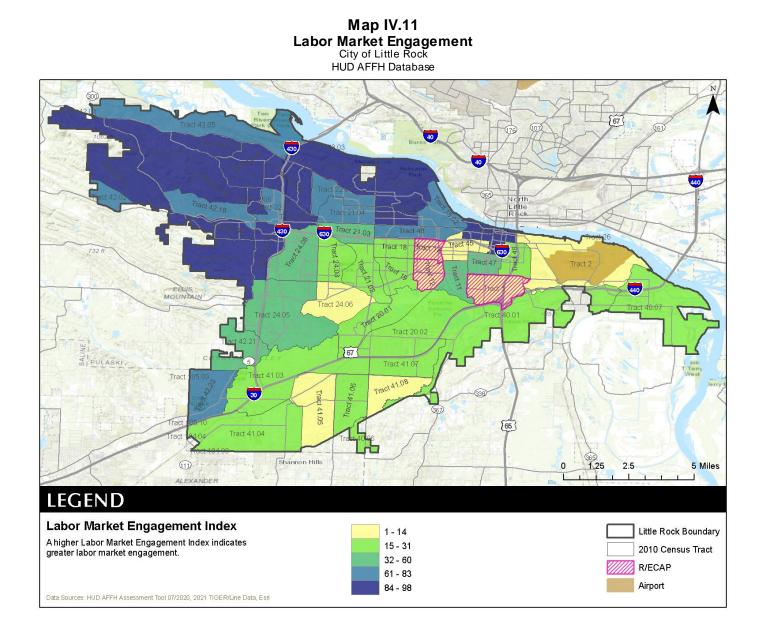
#### LABOR MARKET ENGAGEMENT INDEX

The Labor Market Engagement Index provides a measure of unemployment rate, labor-force participation rate, and percent of the population ages 25 and above with at least a bachelor's degree, by neighborhood Map IV.11 shows the labor market engagement for the City. Areas in northwestern Little Rock had the highest rate of labor market engagement, above 84 index ratings. Areas in central and southern Little Rock had the lowest labor market engagement index ratings, with index ratings below 14.

Geographic location did seem to correspond with greater access to jobs and labor market engagement, with areas of the City have a higher level of labor market engagement than other areas. In addition, African American and Hispanic populations have lower access to labor market engagement in the City.







#### TRANSPORTATION TRIP INDEX

The Transportation Trip Index measures proximity to public transportation by neighborhood. There was little difference in index rating across racial and ethnic groups. The Transportation Trip Index measures proximity to public transportation by neighborhood. The Transit Trips Index measures how often low-income families in a neighborhood use public transportation. The highest rate of transit trips were in central Little Rock, indicating the most transit use in that part of the City.

#### LOW TRANSPORTATION COST INDEX

The Low Transportation Cost Index measures cost of transport and proximity to public transportation by neighborhood. Transportation Costs saw a similar pattern as with Transit Trips; the highest transportation cost index ratings were in central City.

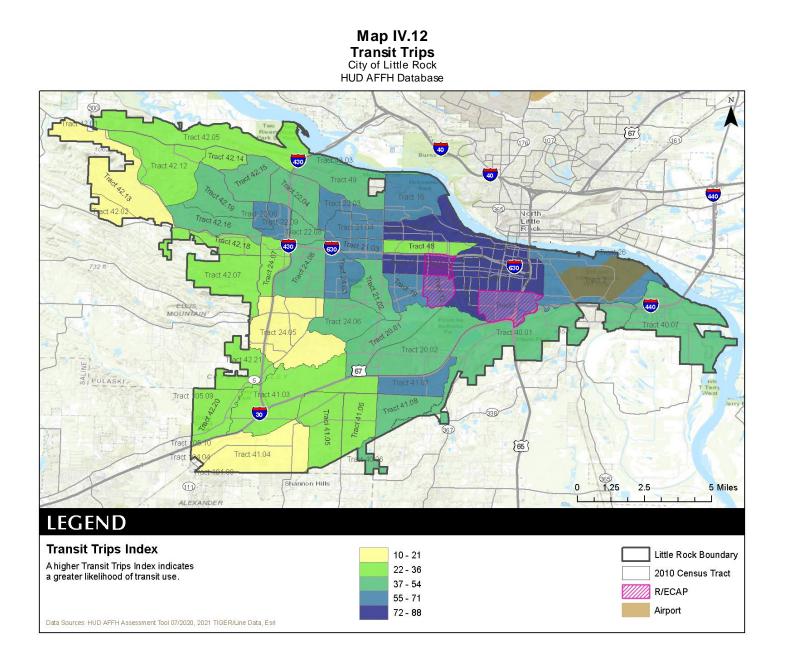
#### **ENVIRONMENTAL HEALTH INDEX**

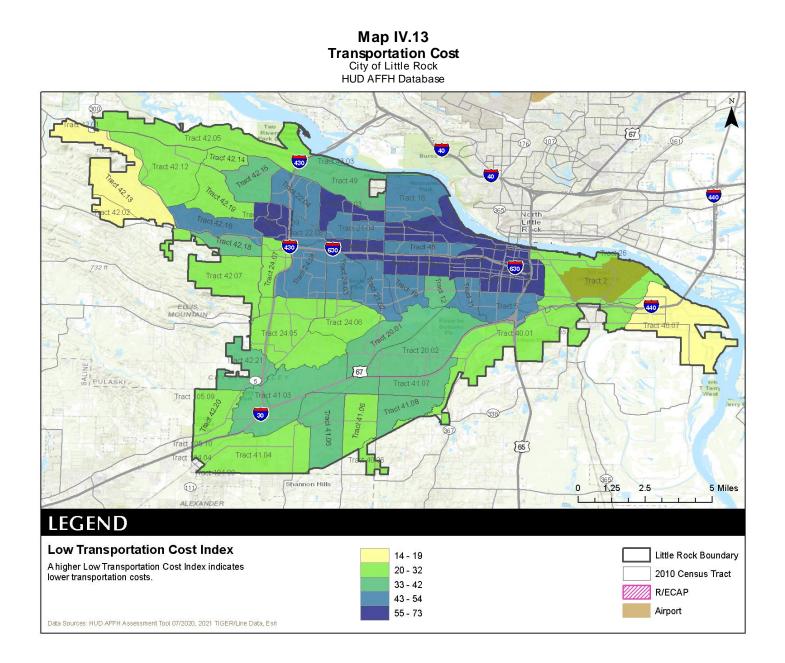
The Environmental Health Index measures exposure based on EPA estimates of air quality carcinogenic, respiratory and neurological toxins by neighborhood.

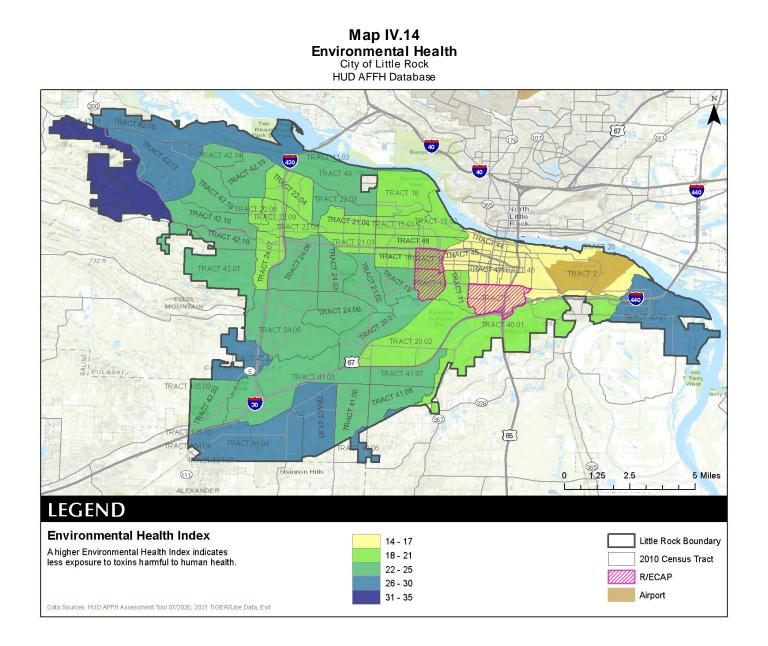
The Environmental Health Index varied widely in the City, with the areas in central Little Rock seeing the lowest ratings.

#### PATTERNS IN DISPARITIES IN ACCESS TO OPPORTUNITY

The degree to which residents had access to low poverty areas, school proficiency, and labor market engagement differed depending on their race or ethnicity, particularly resulting in lower index ratings for African American and Hispanic households in the City of Little Rock. Other measures of opportunity (job proximity, use of public transit, transportation costs, and environmental quality) did not differ dramatically by race or ethnicity. The areas with the low index rating for low poverty are also tend to be areas with the highest concentrations of African American households. However, there are higher index rating in these areas, such as job proximity and low transportation cost. The barriers to accessing various opportunities are both geographically based and based on racial and ethnic disparities in the City.







# **E. DISPROPORTIONATE HOUSING NEEDS**

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

#### Overcrowding

Overcrowding is defined as having from 1.1 to 1.5 people per room per residence, with severe overcrowding defined as having more than 1.5 people per room. Households with overcrowding are shown in Table IV.24. In 2019, an estimated 1.7 percent of households were overcrowded, and an additional 0.8 percent were severely overcrowded.

	Table IV.24         Overcrowding and Severe Overcrowding         Little Rock         2010 & 2019 Five-Year ACS Data							
Data	No Over	crowding	Overcı	owding	Severe Ove	rcrowding	<b>-</b>	
Source	Households	% of Total	Households	% of Total	Households	% of Total	Total	
			Owi	ner				
2010 ACS	45,024	99.2%	276	0.6%	67	0.1%	45,367	
2019 ACS	44,922	99.0%	336	0.7%	97	0.2%	45,355	
			Ren	ter				
2010 ACS	32,720	95.9%	1,031	3.0%	371	1.1%	34,122	
2019 ACS	35,055	95.7%	1,042	2.8%	535	1.5%	36,632	
	Total							
2010 ACS	77,744	97.8%	1,307	1.6%	438	0.6%	79,489	
2019 ACS	79,977	97.5%	1,378	1.7%	632	0.8%	81,987	

#### Incomplete plumbing and kitchen facilities

Incomplete plumbing and kitchen facilities are another indicator of potential housing problems. According to the Census Bureau, a housing unit is classified as lacking complete plumbing facilities when any of the following are not present: piped hot and cold water, a flush toilet, and a bathtub or shower. Likewise, a unit is categorized as deficient when any of the following are missing from the kitchen: a sink with piped hot and cold water, a range or cook top and oven, and a refrigerator. There were a total of 345 households with incomplete plumbing facilities in 2019, representing 0.4 percent of households in Little Rock. This is compared to 0.3 percent of households lacking complete plumbing facilities in 2010.

Households with Inc	I <b>ble IV.25</b> omplete Plumbing Little Rock 19 Five-Year ACS Data	Facilities
Households	2010 Five-Year ACS	2019 Five-Year ACS
With Complete Plumbing Facilities	79,263	81,642
Lacking Complete Plumbing Facilities	226	345
Total Households	79,489	81,987
Percent Lacking	0.3%	0.4%

There were 710 households lacking complete kitchen facilities in 2019, compared to 486 households in 2010. This was a change from 0.6 percent of households in 2010 to 0.9 percent in 2019.

Households with Ind	I <b>ble IV.26</b> complete Kitchen F Little Rock 19 Five-Year ACS Data	acilities	
Households	2010 Five-Year ACS	2019 Five-Year ACS	
With Complete Kitchen Facilities	79,003	81,277	
Lacking Complete Kitchen Facilities	486	710	
Total Households	79,489	81,987	
Percent Lacking	0.6%	0.9%	

#### Cost Burden

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

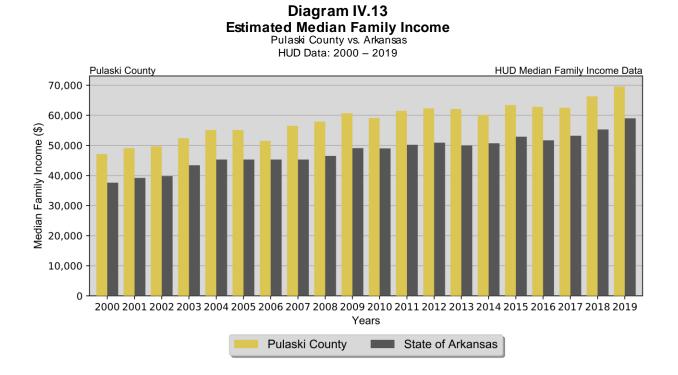
In Little Rock 16.8 percent of households had a cost burden and 14.7 percent had a severe cost burden. An estimated 23.1 percent of renters were cost burdened, and 22.1 percent were severely cost burdened. Owner-occupied households without a mortgage had a cost burden rate of 5.8 percent and a severe cost burden rate of 6.9 percent. Owner occupied households with a mortgage had a cost burden rate of 14.7 percent, and severe cost burden at 9.8 percent.

		С	ost Burden a	and Severe Little	e <b>IV.27</b> <b>Cost Burde</b> Rock e-Year ACS Data		re		
Data	Less Thar	n 30%	31%-	50%	Above	50%	Not Comp	outed	
Source	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	Total
				Owner With	a Mortgage				
2010 ACS	22,394	70.9%	5,857	18.5%	3,208	10.2%	139	0.4%	31,598
2019 ACS	22,228	74.7%	4,368	14.7%	2,906	9.8%	272	0.9%	29,774
				Owner Witho	ut a Mortgage				
2010 ACS	11,903	86.4%	955	6.9%	794	5.8%	117	0.8%	13,769
2019 ACS	13,371	85.8%	897	5.8%	1,072	6.9%	241	1.5%	15,581
				Rei	nter		·		
2010 ACS	15,556	45.6%	8,018	23.5%	8,380	24.6%	2,168	6.4%	34,122
2019 ACS	17,922	48.9%	8,472	23.1%	8,091	22.1%	2,147	5.9%	36,632
			<u> </u>	То	tal		·		
2010 ACS	49,853	62.7%	14,830	18.7%	12,382	15.6%	2,424	3.0%	79,489
2019 ACS	53,521	65.3%	13,737	16.8%	12,069	14.7%	2,660	3.2%	81,987

#### **Housing Problems by Income**

Table IV.28 shows the HUD calculated Median Family Income (MFI) for a family of four for Pulaski County. As can be seen in 2019 the MFI was 69,600 dollars, which compared to 59,000 dollars for the State of Arkansas.

N	Table IV.28Median Family IncomePulaski County2000-2019 HUD MFI								
Year	MFI	State of Arkansas MFI							
2000	47,100	37,600							
2001	49,100	39,200							
2002	49,700	39,800							
2003	52,400	43,400							
2004	55,100	45,300							
2005	55,100	45,300							
2006	51,500	45,300							
2007	56,500	45,300							
2008	57,900	46,500							
2009	60,700	49,100							
2010	59,100	49,000							
2011	61,500	50,200							
2012	62,300	50,900							
2013	62,100	50,000							
2014	60,100	50,700							
2015	63,400	52,900							
2016	62,800	51,700							
2017	62,500	53,200							
2018	66,300	55,300							
2019	69,600	59,000							



# Comprehensive Housing Affordability Strategy (CHAS)

The following table set shows Comprehensive Housing Affordability Strategy (CHAS) data.

Each year, the U.S. Department of Housing and Urban Development (HUD) receives custom tabulations of American Community Survey (ACS) data from the U.S. Census Bureau. These data, known as the "CHAS" data (Comprehensive Housing Affordability Strategy), demonstrate the extent of housing problems and housing needs, particularly for low income households. The CHAS data are used by local governments to plan how to spend HUD funds, and may also be used by HUD to distribute grant funds.

To make this dataset more accessible to the average user the income brackets were replaced with actual Median Family Income (MFI). Below is a table show in the MFI breakdown:

Income Brackets	Actual Income
0 - 30% MFI	\$0 to \$20,880
30.1% - 50% MFI	\$20,881 to \$34,800
50.1% - 80% MFI	\$34,801 to \$55,680
80.1% - 100% MFI	\$55,681 to \$69,600
100% + MFI	Above \$69,600

#### Housing Problems by Income, Race, and Tenure

Table IV.29 through Table IV.34 show households with housing problems by race/ethnicity. These tables can be used to determine if there is a disproportionate housing need for any racial or ethnic groups. If any racial/ethnic group faces housing problems at a rate of ten percentage points or high than the jurisdiction average, then they have a disproportionate share of housing problems. Housing problems are defined as any household that has overcrowding, inadequate kitchen or plumbing facilities, or are cost burdened (pay more than 30 percent of their in come on housing). In Little Rock, 3,990 African American homeowner households face housing problems, 320 Asian households, and 599 Hispanic homeowner households face housing problems.

Percent	of Hom	eowner Ho	useholds	able IV.29 with Housi Little Rock 016 HUD CHAS	ng Proble	ms by Inc	ome and Rad	e
			Non-Hispa	anic by Race			Hispanic	
Income	White	African American	Asian	American Indian	Pacific Islander	Other Race	(Any Race)	Total
			With H	lousing Proble	ems		·	
\$0 to \$20,880	72.9%	76.4%	89.7%	23.1%	0%	66.7%	85.1%	74.7%
\$20,881 to \$34,800	51.4%	63.3%	100.0%	0%	0%	100.0%	46.4%	56.7%
\$34,801 to \$55,680	48.2%	36.9%	71.4%	0%	0%	52.4%	64.8%	44.3%
\$55,681 to \$69,600	22.1%	24.2%	59.4%	0%	0%	0%	2.6%	23.5%
Above \$69,600	5.8%	4.1%	15.0%	0%	0%	8.9%	10.1%	5.8%
Total	17.1%	29.5%	25.7%	13.0%	0%	<b>29.8</b> %	43.8%	22.1%
			Without	Housing Prob	lems			
\$0 to \$20,880	10.1%	16.2%	10.3%	0%	0%	0%	14.9%	13.2%
\$20,881 to \$34,800	48.6%	36.7%	0%	0%	0%	0%	53.6%	43.3%
\$34,801 to \$55,680	51.8%	63.1%	28.6%	0%	0%	47.6%	35.2%	55.7%
\$55,681 to \$69,600	77.9%	75.8%	40.6%	100.0%	0%	100.0%	97.4%	76.5%
Above \$69,600	94.2%	95.9%	85.0%	100.0%	100.0%	91.1%	89.9%	94.2%
Total	82.1%	69.5%	74.3%	43.5%	100.0%	67.4%	56.2%	77.0%

Hon	neownei	<sup>-</sup> Househol	ds with H	ble IV.30 ousing Pro Little Rock 16 HUD CHAS I		ncome ar	nd Race	
Income		A f	Non-His	panic by Race	D://-	Other	Hispanic (Any	Total
lincome	White	African American	Asian	American Indian	Pacific Islander	Other Race	Race)	Iotai
			With Ho	ousing Problem	าร		<u> </u>	
\$0 to \$20,880	940	1,390	35	15	0	40	200	2,620
\$20,881 to \$34,800	980	985	30	0	0	25	130	2,150
\$34,801 to \$55,680	1,240	985	10	0	0	110	230	2,575
\$55,681 to \$69,600	500	390	95	0	0	0	4	989
Above \$69,600	1,165	240	150	0	0	35	35	1,625
Total	4,825	3,990	320	15	0	210	599	9,959
			Without I	Housing Proble	ems			
\$0 to \$20,880	130	295	4	0	0	0	35	464
\$20,881 to \$34,800	925	570	0	0	0	0	150	1,645
\$34,801 to \$55,680	1,330	1,685	4	0	0	100	125	3,244
\$55,681 to \$69,600	1,765	1,220	65	10	0	15	150	3,225
Above \$69,600	18,945	5,645	850	40	10	360	310	26,160
Total	23,095	9,415	923	50	10	475	770	34,738
			No	ot Computed				
\$0 to \$20,880	220	135	0	50	0	20	0	425
\$20,881 to \$34,800	0	0	0	0	0	0	0	0
\$34,801 to \$55,680	0	0	0	0	0	0	0	0
\$55,681 to \$69,600	0	0	0	0	0	0	0	0
Above \$69,600	0	0	0	0	0	0	0	0
Total	220	135	0	50	0	20	0	425
				Total				
\$0 to \$20,880	1,290	1,820	39	65	0	60	235	3,509
\$20,881 to \$34,800	1,905	1,555	30	0	0	25	280	3,795
\$34,801 to \$55,680	2,570	2,670	14	0	0	210	355	5,819
\$55,681 to \$69,600	2,265	1,610	160	10	0	15	154	4,214
Above \$69,600	20,110	5,885	1,000	40	10	395	345	27,785
Total	28,140	13,540	1,243	115	10	705	1,369	45,122

In total, 16,590 renter households face housing problems in Little Rock. Of these, some 9,595 African American households, 260 Asian households, and 985 Hispanic renter households face housing problems.

R	enter H	ouseholds	with Hou	ble IV.31 sing Proble Little Rock 16 HUD CHAS		ome and	Race		
Non-Hispanic by Race									
Income	White	African American	Asian	American Indian / Alaskan Nativ e	Pacific Islander	Other Race	Hispanic (Any Race)	Total	
			With Ho	ousing Proble	ms				
\$0 to \$20,880	1,210	3,830	60	10	0	190	345	5,645	
\$20,881 to \$34,800	1,585	3,180	75	0	0	140	280	5,260	
\$34,801 to \$55,680	1,560	2,215	70	0	0	55	215	4,115	
\$55,681 to \$69,600	380	170	0	0	0	20	75	645	
Above \$69,600	600	200	55	0	0	0	70	925	
Total	5,335	9,595	260	10	0	405	985	16,590	
			Without I	Housing Probl	ems				
\$0 to \$20,880	190	640	0	0	0	0	20	850	
\$20,881 to \$34,800	355	500	15	0	0	0	100	970	
\$34,801 to \$55,680	1,175	2,400	50	0	0	45	285	3,955	
\$55,681 to \$69,600	1,340	1,755	40	0	0	100	360	3,595	
Above \$69,600	4,270	2,675	300	25	20	350	435	8,075	
Total	7,330	7,970	405	25	20	495	1,200	17,445	
			No	t Computed					
\$0 to \$20,880	380	510	95	0	0	55	85	1,125	
\$20,881 to \$34,800	0	0	0	0	0	0	0	0	
\$34,801 to \$55,680	0	0	0	0	0	0	0	0	
\$55,681 to \$69,600	0	0	0	0	0	0	0	0	
Above \$69,600	0	0	0	0	0	0	0	0	
Total	380	510	95	0	0	55	85	1,125	
				Total					
\$0 to \$20,880	1,780	4,980	155	10	0	245	450	7,620	
\$20,881 to \$34,800	1,940	3,680	90	0	0	140	380	6,230	
\$34,801 to \$55,680	2,735	4,615	120	0	0	100	500	8,070	
\$55,681 to \$69,600	1,720	1,925	40	0	0	120	435	4,240	
Above \$69,600	4,870	2,875	355	25	20	350	505	9,000	
Total	13,045	18,075	760	35	20	955	2,270	35,160	

Perce	ent of Re	nter House		ble IV.32 h Housing F	Problems b	v Income	and Race	
1 0100			l	Little Rock 16 HUD CHAS [		<i>y</i>		
				panic by Race				
Income	White	African American	Asian	American Indian	Pacific Islander	Other Race	Hispanic (Any Race)	Total
			With Ho	ousing Problem	າຣ			
\$0 to \$20,880	68.0%	76.9%	38.7%	100.0%	0%	77.6%	76.7%	<b>74.1</b> %
\$20,881 to \$34,800	81.7%	86.4%	83.3%	0%	0%	100.0%	73.7%	84.4%
\$34,801 to \$55,680	57.0%	48.0%	58.3%	0%	0%	55.0%	43.0%	<b>51.0</b> %
\$55,681 to \$69,600	22.1%	8.8%	0%	0%	0%	16.7%	17.2%	15.2%
Above \$69,600	12.3%	7.0%	15.5%	0%	0%	0%	13.9%	<b>10.3</b> %
Total	<b>40.9</b> %	53.1%	34.2%	28.6%	0%	<b>42.4</b> %	43.4%	<b>47.2</b> %
			Without	Housing Proble	ems			
\$0 to \$20,880	10.7%	12.9%	0%	0%	0%	0%	4.4%	<b>11.2</b> %
\$20,881 to \$34,800	18.3%	13.6%	16.7%	0%	0%	0%	26.3%	15.6%
\$34,801 to \$55,680	43.0%	52.0%	41.7%	0%	0%	45.0%	57.0%	<b>49.0</b> %
\$55,681 to \$69,600	77.9%	91.2%	100.0%	0%	0%	83.3%	82.8%	84.8%
Above \$69,600	87.7%	93.0%	84.5%	100.0%	100.0%	100.0%	86.1%	<b>89.7</b> %
Total	56.2%	44.1%	53.3%	71.4%	100.0%	51.8%	<b>52.9</b> %	49.6%

Overall, there are 26,549 households with housing problems in Little Rock. This includes 13,585 African American households, 580 Asian households, 25 American Indian / Alaskan Native, 0 Pacific Islander, and 615 "other" race households with housing problems. As for ethnicity, there are 1,584 Hispanic households with housing problems. This is shown in Table IV.34.

Pei	rcent of T	otal Househ	olds with	ble IV.33 Housing Pro ittle Rock 6 HUD CHAS D	-	Income a	nd Race	
			Non-Hispa	nic by Race				
Income	White	African American	Asian	American Indian	Pacific Islander	Other Race	Hispanic (Any Race)	Total
			With Ho	using Problem	s			
\$0 to \$20,880	70.0%	76.8%	49.0%	33.3%	0%	75.4%	79.6%	74.3%
\$20,881 to \$34,800	66.7%	79.6%	87.5%	0%	0%	100.0%	62.1%	73.9%
\$34,801 to \$55,680	52.8%	43.9%	59.7%	0%	0%	53.2%	52.0%	<b>48.2</b> %
\$55,681 to \$69,600	22.1%	15.8%	47.5%	0%	0%	14.8%	13.4%	<b>19.3</b> %
Above \$69,600	7.1%	5.0%	15.1%	0%	0%	4.7%	12.4%	6.9%
Total	<b>24.7</b> %	<b>43.0</b> %	<b>29.0</b> %	<b>16.7</b> %	0%	<b>37.0</b> %	43.5%	33.1%
			Without H	lousing Proble	ms			
\$0 to \$20,880	10.4%	13.8%	2.1%	0%	0%	0%	8.0%	<b>11.8</b> %
\$20,881 to \$34,800	33.3%	20.4%	12.5%	0%	0%	0%	37.9%	<b>26.1</b> %
\$34,801 to \$55,680	47.2%	56.1%	40.3%	0%	0%	46.8%	48.0%	<b>51.8</b> %
\$55,681 to \$69,600	77.9%	84.2%	52.5%	100.0%	0%	85.2%	86.6%	<b>80.7</b> %
Above \$69,600	92.9%	95.0%	84.9%	100.0%	100.0%	95.3%	87.6%	<b>93.1</b> %
Total	<b>73.9</b> %	<b>55.0</b> %	66.3%	<b>50.0</b> %	<b>100.0</b> %	<b>58.4</b> %	54.1%	<b>65.0</b> %

т	Table IV.34         Total Households with Housing Problems by Income and Race         Little Rock         2012–2016 HUD CHAS Data										
			Non-Hisp	anic by Race			Hispanic				
Income	White	African American	Asian	American Indian	Pacific Islander	Other Race	(Any Race)	Total			
			With Hou	using Problems	S						
\$0 to \$20,880	2,150	5,220	95	25	0	230	545	8,265			
\$20,881 to \$34,800	2,565	4,165	105	0	0	165	410	7,410			
\$34,801 to \$55,680	2,800	3,200	80	0	0	165	445	6,690			
\$55,681 to \$69,600	880	560	95	0	0	20	79	1,634			
Above \$69,600	1,765	440	205	0	0	35	105	2,550			
Total	10,160	13,585	580	25	0	615	1,584	26,549			
			Without H	ousing Probler	ns						
\$0 to \$20,880	320	935	4	0	0	0	55	1,314			
\$20,881 to \$34,800	1,280	1,070	15	0	0	0	250	2,615			
\$34,801 to \$55,680	2,505	4,085	54	0	0	145	410	7,199			
\$55,681 to \$69,600	3,105	2,975	105	10	0	115	510	6,820			
Above \$69,600	23,215	8,320	1,150	65	30	710	745	34,235			
Total	30,425	17,385	1,328	75	30	970	1,970	52,183			
			Not	Computed							
\$0 to \$20,880	600	645	95	50	0	75	85	1,550			
\$20,881 to \$34,800	0	0	0	0	0	0	0	0			
\$34,801 to \$55,680	0	0	0	0	0	0	0	0			
\$55,681 to \$69,600	0	0	0	0	0	0	0	0			
Above \$69,600	0	0	0	0	0	0	0	0			
Total	600	645	95	50	0	75	85	1,550			
				Total							
\$0 to \$20,880	3,070	6,800	194	75	0	305	685	11,129			
\$20,881 to \$34,800	3,845	5,235	120	0	0	165	660	10,025			
\$34,801 to \$55,680	5,305	7,285	134	0	0	310	855	13,889			
\$55,681 to \$69,600	3,985	3,535	200	10	0	135	589	8,454			
Above \$69,600	24,980	8,760	1,355	65	30	745	850	36,785			
Total	41,185	31,615	2,003	150	30	1,660	3,639	80,282			

These racial/ethnic groups were also disproportionately impacted by severe housing problems, as seen in Tables IV.35 through IV. 37. Severe housing problems include overcrowding at a rate of more than 1.5 persons per room and housing costs exceeding 50 percent of the household income. Approximately, 7,215 African American homeowner households face severe housing problems, as well as 234 Asian homeowner households, and 324 Hispanic homeowner households. This accounts for 14.5 percent of African American homeowner households and 23.7 percent of Hispanic homeowner households. In addition, an estimated 29.1 percent of African American renter households have severe housing problems.

Percent of H	omeowr	ner Househ	olds with	ble IV.35 Severe Ho Little Rock 16 HUD CHAS		olems by li	ncome and	Race				
Income	White American Asian Indian Islander Rad											
American         American         Indian         Islander         Race         Race)           With A Severe Housing Problem												
\$0 to \$20,880	58.9%	62.0%	89.7%	23.1%	0%	41.7%	51.1%	59.4%				
\$20,881 to \$34,800	29.7%	32.9%	50.0%	0%	0%	40.0%	23.2%	30.7%				
\$34,801 to \$55,680	18.9%	7.3%	28.6%	0%	0%	9.5%	30.0%	13.9%				
\$55,681 to \$69,600	4.0%	1.9%	0%	0%	0%	0%	2.6%	2.9%				
Above \$69,600	1.0%	1.8%	0%	0%	0%	2.5%	8.6%	1.2%				
Total	7.5%	14.5	<b>4.4</b> %	<b>13.0</b> %	0%	<b>9.2</b> %	23.7%	10.0%				
		N	lithout A Sev	vere Housing F	Problems							
\$0 to \$20,880	24.0%	30.6%	10.3%	0%	0%	25.0%	48.9%	28.5%				
\$20,881 to \$34,800	70.3%	67.1%	50.0%	0%	0%	60.0%	76.8%	69.3%				
\$34,801 to \$55,680	81.1%	92.7%	71.4%	0%	0%	90.5%	70.0%	86.1%				
\$55,681 to \$69,600	96.0%	98.1%	100.0%	100.0%	0%	100.0%	97.4%	97.1%				
Above \$69,600	99.0%	98.2%	100.0%	100.0%	100.0%	97.5%	91.4%	98.8%				
Total	<b>91.8</b> %	84.5%	<b>95.6</b> %	<b>43.5</b> %	100.0%	<b>87.9</b> %	<b>76.3</b> %	<b>89.0</b> %				

Percent o	f Rente	r Househo			sing Proble	ems by Inc	come and Ra	ice				
			2012-2	Little Rock	S Data							
				panic by Race			lliononio					
Income	White	African American	Other Race	<ul> <li>Hispanic</li> <li>(Any Race)</li> </ul>	Total							
American         Indian         Islander         Race         Carry racor           With A Severe Housing Problem												
\$0 to \$20,880	62.1%	65.3%	38.7%	100.0%	0%	57.1%	59.3%	63.4%				
\$20,881 to \$34,800	47.4%	35.2%	72.2%	0%	0%	35.7%	15.6%	38.4%				
\$34,801 to \$55,680	11.3%	8.6%	0%	0%	0%	15.0%	11.0%	9.6%				
\$55,681 to \$69,600	8.2%	7.8%	0%	0%	0%	0%	0%	6.8%				
Above \$69,600	7.5%	5.6%	15.5%	0%	0%	0%	13.9%	7.2%				
Total	<b>21.8</b> %	<b>29.1</b> %	<b>23.7</b> %	<b>28.6</b> %	0%	<b>21.4</b> %	20.0%	<b>25.4</b> %				
			Without A S	evere Housing	Problems							
\$0 to \$20,880	16.6%	24.5%	0%	0%	0%	20.4%	22.0%	21.8%				
\$20,881 to \$34,800	52.6%	64.8%	27.8%	0%	0%	64.3%	84.4%	61.6%				
\$34,801 to \$55,680	88.7%	91.4%	100.0%	0%	0%	85.0%	89.0%	<b>90.4</b> %				
\$55,681 to \$69,600	91.8%	92.2%	100.0%	0%	0%	100.0%	100.0%	<b>93.2</b> %				
Above \$69,600	92.5%	94.4%	84.5%	100.0%	100.0%	100.0%	86.1%	<b>92.8</b> %				
Total	75.3%	<b>68.1</b> %	<b>63.8</b> %	71.4%	100.0%	<b>72.9</b> %	<b>76.3</b> %	71.4%				

Percent of	Table IV.37         Percent of Total Households with Severe Housing Problems by Income and Race         Little Rock         2012–2016 HUD CHAS Data											
	Non-Hispanic by Race											
Income	White	African American	Asian	American Indian / Alaskan Nativ e	Pacific Islander	Other Race	(Any Race)					
		V	Vith A Seve	ere Housing Pro	oblem							
\$0 to \$20,880 \$20,881 to \$34,800	60.7% 38.6%	64.4% 34.5%	49.0% 66.7%	33.3% 0%	0% 0%	54.1% 36.4%	56.5% 18.8%	62.1% 35.5%				
\$34,801 to \$55,680 \$55,681 to \$69,600	15.0% 5.8%	8.1% 5.1%	3.0% 0%	0% 0%	0% 0%	11.3% 0%	18.8% 0.7%	11.4% 4.9%				
Above \$69,600	2.3%	3.0%	4.1%	0%	0%	1.3%	11.7%	2.7%				
Total	<b>12.0</b> %	<b>22.8</b> %	<b>11.7</b> %	<b>16.7</b> %	0%	<b>16.2</b> %	<b>21.3</b> %	<b>16.8</b> %				
		Wit	hout A Sev	ere Housing Pr	oblems							
\$0 to \$20,880	19.7%	26.1%	2.1%	0%	0%	21.3%	31.2%	23.9%				
\$20,881 to \$34,800	61.4%	65.5%	33.3%	0%	0%	63.6%	81.2%	64.5%				
\$34,801 to \$55,680	85.0%	91.9%	97.0%	0%	0%	88.7%	81.2%	88.6%				
\$55,681 to \$69,600 Above \$69,600	94.2% 97.7%	94.9% 97.0%	100.0% 95.9%	100.0% 100.0%	0% 100.0%	100.0% 98.7%	99.3% 88.3%	95.1% 97.3%				
Total	86.5%	75.1%	83.5%	<b>50.0</b> %	100.0%	<b>79.3</b> %	<b>76.3</b> %	81.3%				

As seen in Table IV.38, the most common housing problem tends to be housing cost burdens. As seen in Table IV.39, more than 13,080 households have a cost burden and 11,040 have a severe cost burden. Some 7,655 renter households are impacted by cost burdens, and 6,975 are impacted by severe cost burdens. On the other hand, some 5,425 owner-occupied households have cost burdens, and 4,065 have severe cost burdens.

There are a total of 5,425 owner-occupied and 7,655 renter-occupied households with a cost burden of greater than 30 percent and less than 50 percent. An additional 4,065 owner-occupied 6,975 renter-occupied households had a cost burden greater than 50 percent of income. Overall there are 52,185 households without a housing problem.

		Table I				
Perce		i <b>ng Problem</b> Little R	ock	e and Tenu	ire	
	2 \$0 to	012–2016 HUD \$20,881 to	CHAS Data \$34,801 to	\$55,681 to	Aboy e	
Housing Problem	\$20,880	\$34,800	\$55,680	\$69,600 \$69,600	\$69,600	Total
		Owner-Oc	cupied			
Lacking complete plumbing or kitchen facilities	0.6%	0.7%	1.0%	0%	0.1%	0.3%
Severely Overcrowded with > 1.51 people per room (and complete kitchen and plumbing)	0.4%	0.1%	0.7%	0%	0.1%	0.2%
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	0.6%	0.4%	1.3%	0.4%	0.4%	0.5%
Housing cost burden greater that 50% of income (and none of the above problems)	57.8%	29.6%	10.9%	2.6%	0.6%	9.0%
Housing cost burden greater than 30% of income (and none of the above problems)	15.2%	25.9%	30.2%	20.6%	4.6%	12.0%
Zero/negative income (and none of the above problems)	12.1%	0%	0%	0%	0%	0.9%
has none of the 4 housing problems	13.4%	43.4%	55.9%	76.4%	94.2%	77.0%
Total	100.0%	100.0% Renter-Oco	100.0%	100.0%	100.0%	100.0%
		Renter-Oct	Jupieu			
Lacking complete plumbing or kitchen facilities	2.0%	2.2%	1.9%	3.8%	1.8%	2.2%
Severely Overcrowded with > 1.51 people per room (and complete kitchen and plumbing)	0.9%	0.9%	0.8%	0.5%	0.4%	0.7%
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	3.0%	1.9%	3.3%	1.4%	3.1%	2.7%
Housing cost burden greater that 50% of income (and none of the above problems)	57.5%	33.3%	3.6%	1.3%	1.9%	19.8%
Housing cost burden greater than 30% of income (and none of the above problems)	10.7%	46.1%	41.4%	8.4%	3.1%	21.8%
Zero/negative income (and none of the above problems)	14.8%	0%	0%	0%	0%	3.2%
has none of the 4 housing problems	11.1%	15.6%	49.0%	84.7%	89.7%	49.6%
Total	<b>100.0</b> %	100.0%	100.0%	100.0%	100.0%	100.0%

		ole IV.39				
Housing	Li	ttle Rock		•		
		6 HUD CHAS Da				
Housing Problem	\$0 to \$20,880	\$20,881 to \$34,800	\$34,801 to \$55,680	\$55,681 to \$69,600	Abov e \$69,600	Total
	Own	er-Occupied				
Lacking complete plumbing or kitchen facilities	20	25	60	0	30	135
Severely Overcrowded with > 1.51 people per room (and complete kitchen and plumbing)	15	4	40	0	25	84
Overcrowded - With 11-1.5 people per room (and none of the above problems)	20	15	75	15	120	245
Housing cost burden greater that 50% of income (and none of the above problems)	2,035	1,120	635	110	165	4,065
Housing cost burden greater than 30% of income (and none of the above problems)	535	980	1,755	870	1,285	5,425
Zero/negative income (and none of the above problems)	425	0	0	0	0	425
has none of the 4 housing problems	470	1,645	3,245	3,225	26,160	34,745
Total	3,520	3,789	5,810	4,220	27,785	45,124
	,	er-Occupied	0,010	4,220	21,100	40,124
Lacking complete plumbing or kitchen facilities	150	140	150	160	165	765
Severely Overcrowded with > 1.51 people per room (and complete kitchen and plumbing)	65	55	65	20	35	240
Overcrowded - With 11-1.5 people per room (and none of the above problems)	230	120	270	60	280	960
Housing cost burden greater that 50% of income (and none of the above problems)	4,385	2,075	290	55	170	6,975
Housing cost burden greater than 30% of income (and none of the above problems)	815	2,870	3,340	355	275	7,655
Zero/negative income (and none of the above problems)	1,130	0	0	0	0	1,130
has none of the 4 housing problems	850	970	3,955	3,590	8,075	17,440
Total	7,625	6,230	8,070	4,240	9,000	35,165
		Total				
Lacking complete plumbing or kitchen facilities	170	165	210	160	195	900
Severely Overcrowded with > 1.51 people per room (and complete kitchen and plumbing)	80	59	105	20	60	324
Overcrowded - With 11-1.5 people per room (and none of the above problems)	250	135	345	75	400	1,205
Housing cost burden greater that 50% of income (and none of the above problems)	6,420	3,195	925	165	335	11,040
Housing cost burden greater than 30% of income (and none of the above problems)	1,350	3,850	5,095	1,225	1,560	13,080
Zero/negative income (and none of the above problems)	1,555	0	0	0	0	1,555
has none of the 4 housing problems	1,320	2,615	7,200	6,815	34,235	52,185

#### **Cost Burdens**

For owner occupied housing, elderly non-family households are most likely to be impacted by housing cost burdens, with 32.7 percent of these households having a cost burden or severe cost burden. For lower income owner households, elderly non-family households and large families are most likely to experience cost burdens. Some 77.7 percent of elderly non-family and 88.6 percent of large family households below 30 percent HAMFI face cost burdens or severe cost burdens. These data are shown in Table IV.40.

Owner-Occupied He	Table IV.40         Owner-Occupied Households by Income and Family Status and Cost Burden         Little Rock         2012–2016 HUD CHAS Data											
Income	Elderly Family	Small Family	Large Family	Elderly Non-Family	Other Household	Total						
		No Cos	t Burden									
\$0 to \$20,880 75 95 0 240 70 480												
\$20,881 to \$34,800	240	255	165	850	165	1,675						
\$34,801 to \$55,680	540	1,055	280	910	600	3,385						
\$55,681 to \$69,600	565	965	330	685	695	3,240						
Above \$69,600	5,165	13,445	1,575	2,430	3,710	26,325						
Total	6,585	15,815	2,350	5,115	5,240	35,105						
			Burden									
\$0 to \$20,880	65	75	55	340	25	560						
\$20,881 to \$34,800	130	375	55	315	120	995						
\$34,801 to \$55,680	75	945	65	245	460	1,790						
\$55,681 to \$69,600	105	345	110	165	145	870						
Above \$69,600	325	465	155	110	230	1,285						
Total	700	2,205	440	1,175	980	5,500						
		Severe C	ost Burden	1								
\$0 to \$20,880	150	295	100	775	735	2,055						
\$20,881 to \$34,800	85	380	75	330	255	1,125						
\$34,801 to \$55,680	75	230	10	205	110	630						
\$55,681 to \$69,600	0	75	0	25	10	110						
Above \$69,600	85	75	0	10	0	170						
Total	395	1,055	185	1,345	1,110	4,090						
	Co	st Burden	Not Compu									
\$0 to \$20,880	40	115	20	80	170	425						
\$20,881 to \$34,800	0	0	0	0	0	0						
\$34,801 to \$55,680	0	0	0	0	0	0						
\$55,681 to \$69,600	0	0	0	0	0	0						
Above \$69,600	0	0	0	0	0	0						
Total	40	115	20	80	170	425						
			otal									
\$0 to \$20,880	330	580	175	1,435	1,000	3,520						
\$20,881 to \$34,800	455	1,010	295	1,495	540	3,795						
\$34,801 to \$55,680	690	2,230	355	1,360	1,170	5,805						
\$55,681 to \$69,600	670	1,385	440	875	850	4,220						
Above \$69,600	5,575	13,985	1,730	2,550	3,940	27,780						
Total	7,720	19,190	2,995	7,715	7,500	45,120						

Renter households are impacted at a higher rate by cost burdens than owner households. There are 15,394 renter occupied households faced cost burdens. Of these, there are 5,554 renter households with incomes less than 30 percent HAMFI facing cost burdens.

Table IV.41           Renter-Occupied Households by Income and Family Status and Cost Burden           Little Rock           2012–2016 HUD CHAS Data											
Income	Elderly Family	Small Family	Large Family	Elderly Non-Family	Other Household	Total					
		No Co	st Burden								
\$0 to \$20,880	45	190	60	245	380	920					
\$20,881 to \$34,800	35	400	40	180	400	1,055					
\$34,801 to \$55,680	45	1,670	365	465	1,800	4,345					
\$55,681 to \$69,600	150	1,475	190	280	1,680	3,775					
Above \$69,600	360	3,715	275	610	3,565	8,525					
Total	635	7,450	930	1,780	7,825	18,620					
		Cos	t Burden								
\$0 to \$20,880	4	315	35	155	335	844					
\$20,881 to \$34,800	45	1,265	180	200	1,275	2,965					
\$34,801 to \$55,680	115	1,185	115	365	1,645	3,425					
\$55,681 to \$69,600	15	85	15	115	180	410					
Above \$69,600	40	30	0	60	180	310					
Total	219	2,880	345	895	3,615	7,954					
		Severe	Cost Burde	en							
\$0 to \$20,880	150	1,345	465	600	2,150	4,710					
\$20,881 to \$34,800	100	825	55	320	905	2,205					
\$34,801 to \$55,680	50	40	0	130	80	300					
\$55,681 to \$69,600	15	0	0	35	0	50					
Above \$69,600	80	0	0	70	25	175					
Total	395	2,210	520	1,155	3,160	7,440					
	(	Cost Burde	n Not Com	puted							
\$0 to \$20,880	10	335	30	75	700	1,150					
\$20,881 to \$34,800	10	0	0	0	0	0					
\$34,801 to \$55,680	0	0	0	0	0	0					
\$55,681 to \$69,600	0	0	0	0	0	0					
Above \$69,600	0	0	0	0	0	0					
Total	10	335	30	75	700	1,150					
			Total								
\$0 to \$20,880	209	2,185	590	1,075	3,565	7,624					
\$20,881 to \$34,800	180	2,490	275	700	2,580	6,225					
\$34,801 to \$55,680	210	2,895	480	960	3,525	8,070					
\$55,681 to \$69,600	180	1,560	205	430	1,860	4,235					
Above \$69,600	480	3,745	275	740	3,770	9,010					
Total	1,259	12,875	1,825	3,905	15,300	35,164					

In total, there are 13,455 households face cost burdens, and 11,520 face severe cost burdens. This includes 45,115 owner households and 35,155 renter households, as seen in Table IV.42.

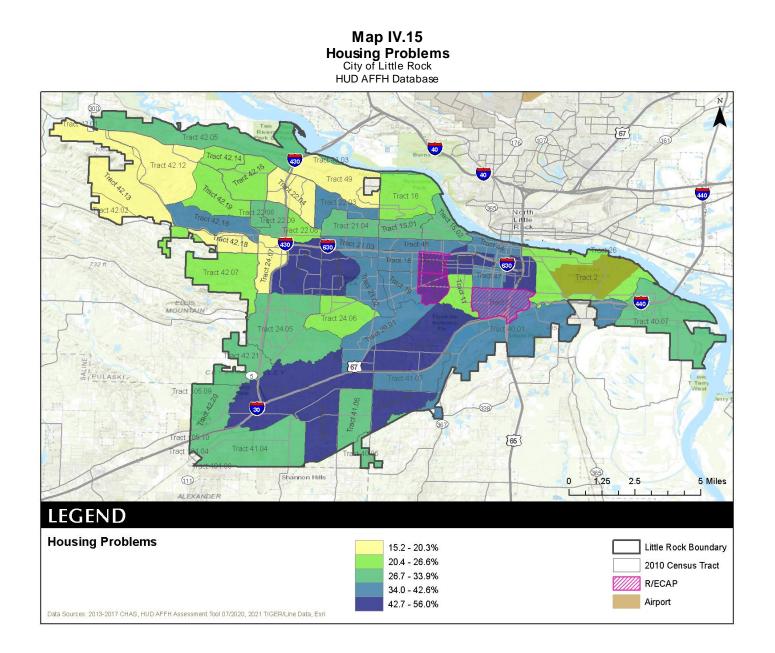
Household	ds with Cost	ble IV.42 Burden by Te ittle Rock 6 HUD CHAS Date		ace							
Race	No Cost Burden	Cost Burden	Severe Cost Burden	Not Computed	Total						
Owner-Occupied											
White         23,215         2,735         1,975         220         28,145											
African American	9,570	2,045	1,780	135	13,530						
Asian	930	265	50	0	1,245						
American Indian/Alaskan Native	50	0	15	50	115						
Pacific Islander	10	0	0	0	10						
Other Race	485	145	55	20	705						
Hispanic	850	310	205	0	1,365						
Total	35,110	5,500	4,080	425	45,115						
Renter-Occupied											
White	7,645	2,615	2,380	400	13,040						
African American	8,630	4,485	4,445	510	18,070						
Asian	460	80	125	95	760						
American Indian/Alaskan Native	25	0	10	0	35						
Pacific Islander	20	0	0	0	20						
Other Race	510	200	190	55	955						
Hispanic	1,325	575	290	85	2,275						
Total	18,615	7,955	7,440	1,145	35,155						
		Total									
White	30,860	5,350	4,355	620	41,185						
African American	18,200	6,530	6,225	645	31,600						
Asian	1,390	345	175	95	2,005						
American Indian/Alaskan Native	75	0	25	50	150						
Pacific Islander	30	0	0	0	30						
Other Race	995	345	245	75	1,660						
Hispanic	2,175	885	495	85	3,640						
Total	53,725	13,455	11,520	1,570	80,270						

# **Elderly Housing Needs**

Table IV.43 shows the rate of housing problems for elderly households. There are 4,635 elderly and 2,435 extra-elderly households have housing problems. Extra-elderly is defined as those aged 85 and older. Approximately, 1,850 elderly households with housing problems have incomes less than 30 percent HAMFI, and 635 extra-elderly households have incomes below 30 percent HAMFII.

Households with H	Table IV.43         Households with Housing Problems by Income and Elderly Status         Little Rock         2012–2016 HUD CHAS Data											
Income	Elderly	Extra-Elderly	Non-Elderly	Total								
	With Hous	ing Problems										
\$0 to \$20,880	1,850	635	5,780	8,265								
\$20,881 to \$34,800	980	740	5,685	7,405								
\$34,801 to \$55,680	915	470	5,295	6,680								
\$55,681 to \$69,600	290	205	1,140	1,635								
Above \$69,600	600	385	1,565	2,550								
Total	4,635	2,435	19,465	26,535								
Without Housing Problems												
\$0 to \$20,880 385 180 755 1,320												
\$20,881 to \$34,800	720	725	1,175	2,620								
\$34,801 to \$55,680	01 to \$55,680 1,460 815 4,9											
\$55,681 to \$69,600	1,370	715	4,735	6,820								
Above \$69,600	7,655	2,500	24,080	34,235								
Total	11,590	4,935	35,670	52,195								
	Not C	computed										
\$0 to \$20,880	105	85	1,365	1,555								
\$20,881 to \$34,800	0	0	0	0								
\$34,801 to \$55,680	0	0	0	0								
\$55,681 to \$69,600	0	0	0	0								
Above \$69,600	0	0	0	0								
Total	105	85	1,365	1,555								
		Total										
\$0 to \$20,880	2,340	900	7,900	11,140								
\$20,881 to \$34,800	1,700	1,465	6,860	10,025								
\$34,801 to \$55,680	2,375	1,285	10,220	13,880								
\$55,681 to \$69,600	1,660	920	5,875	8,455								
Above \$69,600	8,255	2,885	25,645	36,785								
Total	16,330	7,455	56,500	80,285								

The geographic distribution of housing problems is shown in Map IV.15, on the following page. Housing problems were most heavily concentrated in central and southern Little Rock. These areas also tended to have higher rates of poverty and racial and ethnic minorities.



#### ACCESS TO MORTGAGE FINANCE SERVICES

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

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

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

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

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

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

For the purposes of this analysis, these flagged originations will be termed predatory, or at least predatory in nature. Overall, the data contained within the HMDA reporting guidelines represent the best and most complete set of information on home loan applications. This report includes HMDA data from 2008 through 2017, the most recent year for which these data are available.

<sup>&</sup>lt;sup>10</sup> Prior to that year, Congress had to periodically reauthorize the law.

<sup>&</sup>lt;sup>11</sup> Each December, the Federal Reserve announces the threshold for the following year. The asset threshold may change from year to year based on changes in the Consumer Price Index for Urban Wage Earners and Clerical Workers.

Banks and other lending institutions handled 89,314 home purchase loans and loan applications in the City from 2008 through 2019. As shown in Table IV.44, a majority of these loans, or over 41,260, were home purchase loans. Home purchase loans represented around 46.2 percent of all loans and loan applications.

	Table IV.44 Purpose of Loan by Year												
Little Rock 2008–2019 HMDA Data													
Purpose	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Total
Home Purchase	1,513	1,471	1,179	1,059	4,263	4,584	4,115	4,363	4,990	4,878	4,408	4,437	41,260
Home Improvement	433	300	255	202	655	774	698	704	778	700	634	592	6,725
Refinancing	1,801	2,100	1,759	1,486	8,181	6,309	3,066	3,528	4,059	2,729	2,177	2,664	39,859
Total	3,747	3,871	3,193	2,747	13,099	11,667	7,879	8,595	9,827	8,307	7,945	8,437	89,314

Table IV.45 shows the occupancy status for loan applicants. It is these home purchase loans, and specifically the "owner-occupied" home purchase loans that will be the focus of the following discussion, as the outcomes of owner-occupied home purchase applications provide the most direct index of the ability of prospective homeowners to choose where they will live. Around 88.7 percent of home-purchase loan applications were submitted by those who intended to live in the home that they purchased.

	Table IV.45         Occupancy Status for Applications         Little Rock         2008–2019 HMDA Data												
Status	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Total
Owner-Occupied	3,195	3,533	2,890	2,449	11,934	10,408	6,959	7,650	8,761	7,255	6,885	7,334	79,253
Not Owner-Occupied	544	335	297	297	1,162	1,225	917	938	1,064	1,045	126	145	8,095
Not Applicable	8	3	6	1	3	34	3	7	2	7	934	958	1,966
Total	3,747	3,871	3,193	2,747	13,099	11,667	7,879	8,595	9,827	8,307	7,945	8,437	89,314

Owner-occupied home purchase loan applications by loan types are shown in Table IV.46. Between 2008 and 2019, some 60.0 percent of home loan purchases were conventional loans, 32.6 percent were FHA insured, and 7.2 percent were VA Guaranteed.

Table IV.46         Owner-Occupied Home Purchase Loan Applications by Loan Type         Little Rock         2008–2019 HMDA Data													
Loan Type	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Total
Conventional	469	318	242	293	2,205	2,528	2,284	2,341	2,901	2,831	2,670	2,682	21,764
FHA - Insured	749	918	735	578	1,418	1,299	1,035	1,251	1,190	1,124	823	697	11,817
VA - Guaranteed	82	84	65	58	254	297	270	280	318	302	280	331	2,621
Rural Housing Service or Farm Service Agency	3	7	2	14	7	8	16	4	3	1	9	5	79
Total	1,303	1,327	1,044	943	3,884	4,132	3,605	3,876	4,412	4,258	3,782	3,715	36,281

#### Denial Rates

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

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

As shown in Table IV.47, just over 18,177 home purchase loan applications were originated over the 2008-2019 period, and 2,483 were denied.

			Loan	Applic	Little R	oy Actio		en					
Action	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Total
Loan Originated	571	530	446	421	1,913	1,975	1,721	1,980	2,296	2,202	2,006	2,116	18,177
Application Approved but not Accepted	38	17	16	13	50	68	79	80	134	102	94	48	739
Application Denied	180	121	93	89	243	285	266	235	277	247	243	204	2,483
Application Withdrawn by Applicant	88	74	75	55	217	246	324	369	396	435	525	503	3,307
File Closed for Incompleteness	32	24	16	21	61	54	53	49	40	44	35	34	463
Loan Purchased by the Institution	394	559	398	344	1,400	1,504	1,162	1,163	1,269	1,226	879	805	11,103
Preapproval Request Denied	0	2	0	0	0	0	0	0	0	2	0	3	7
Preapproval Approved but not Accepted	0	0	0	0	0	0	0	0	0	0	0	2	2
Total	1,303	1,327	1,044	943	3,884	4,132	3,605	3,876	4,412	4,258	3,782	3,715	36,281

The most common reasons cited in the decision to deny one of these loan applications related to the credit history of the prospective homeowner, as shown in Table IV.48. Debt-to-income ratio and collateral were also commonly given as reasons to deny home purchase loans.

Table IV.48         Loan Applications by Reason for Denial         Little Rock         2008–2019 HMDA Data													
Denial Reason	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Total
Debt-to-Income Ratio	25	13	12	14	32	45	36	34	46	44	79	57	437
Employment History	3	2	3	0	2	3	1	1	5	6	5	8	39
Credit History	63	48	26	20	45	44	53	37	48	33	57	66	540
Collateral	10	7	7	5	30	26	18	16	27	19	32	29	226
Insufficient Cash	6	7	5	2	8	12	2	6	6	11	10	11	86
Unverifiable Information	4	1	3	3	7	4	6	10	6	6	16	14	80
Credit Application Incomplete	9	1	1	3	21	7	10	9	14	19	21	9	124
Mortgage Insurance Denied	0	0	0	0	0	0	0	0	1	0	0	0	1
Other	14	9	7	6	19	19	19	11	17	17	19	12	169
Missing	46	33	29	36	79	125	121	111	107	92	4	-2	781
Total	180	121	93	89	243	285	266	235	277	247	243	204	2,483

Denial rates were observed to differ by race and ethnicity, as shown in Table IV.49. African American applicants were denied at an average rate of 23.6 percent, compared to the 7.0 percent for white applicants. Hispanic applicants were also denied at a rate higher than non-Hispanic applicants, at 19.4 percent versus 11.1 percent, respectively.

	Table IV.49         Denial Rates by Race/Ethnicity of Applicant         Little Rock         2008-2019 HMDA Data												
Race/ Ethnicity	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Average
American Indian	100%	75.0%	33.3%	0.0%	80.0%	14.3%	0.0%	0.0%	18.8%	0.0%	20.0%	0.0%	21.7%
Asian	14.3%	28.6%	33.3%	0.0%	14.2%	7.6%	21.6%	12.1%	9.2%	12.8%	8.3%	7.5%	11.8%
African American	28.9%	22.2%	20.1%	22.3%	28.0%	27.9%	28.9%	23.4%	20.8%	20.2%	22.3%	18.4%	23.6%
Pacific Islander	0.0%	0.0%	%	25.0%	66.7%	66.7%	0.0%	16.7%	0.0%	42.9%	0.0%	0.0%	23.7%
White	15.7%	9.3%	10.5%	12.0%	5.7%	7.9%	7.6%	6.3%	7.0%	6.1%	6.7%	5.7%	7.0%
Not Available	33.3%	50.0%	34.6%	44.4%	27.1%	34.7%	34.4%	19.0%	30.9%	22.1%	17.9%	13.2%	24.6%
Not Applicable	%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	%	0.0%	%	0.0%
Average	24.0%	18.6%	17.3%	17.5%	11.3%	12.6%	13.4%	10.6%	10.8%	10.1%	10.8%	8.8%	12.0%
Hispanic	41.3%	27.6%	13.0%	26.1%	13.8%	26.3%	7.1%	13.0%	22.1%	24.1%	14.3%	11.2%	19.4%
Non-Hispanic	21.7%	16.4%	16.5%	16.4%	10.8%	11.4%	12.8%	10.0%	9.6%	9.1%	10.2%	8.0%	11.1%

There were also variations in denial rates by gender: as shown in Table IV.50, the denial rate for prospective female homeowners was 13.6 percent, more than three percentage points higher than the denial rate for male applicants. Denial rates for females were consistently above denial rates for male applicants between 2008 and 2017.

	Table IV.50         Denial Rates by Gender of Applicant         Little Rock         2008–2019 HMDA Data									
Year	Male	Female	Not Available	Not Applicable	Average					
2008	22.3%	23.6%	51.9%	0.0%	24.0%					
2009	17.3%	17.7%	62.5%	0.0%	18.6%					
2010	14.5%	17.9%	63.6%	0.0%	17.3%					
2011	14.3%	20.3%	33.3%	0.0%	17.5%					
2012	9.6%	13.4%	33.3%	0.0%	11.3%					
2013	11.0%	13.9%	45.2%	0.0%	12.6%					
2014	11.9%	14.5%	37.0%	0.0%	13.4%					
2015	8.1%	13.8%	29.5%	0.0%	10.6%					
2016	9.3%	11.8%	31.7%	0.0%	10.8%					
2017	8.6%	11.6%	23.4%	%	10.1%					
2018	9.7%	12.0%	15.8%	0.0%	10.8%					
2019	7.8%	9.2%	20.9%	%	8.8%					
Average	10.2%	13.6%	30.2%	0.0%	12.0%					

## **Predatory Lending**

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

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

As noted previously, home loans are designated as "high-annual percentage rate" loans (HALs) where the annual percentage rate on the loan exceeds that of a comparable treasury instruments by at least three percentage points. As shown in Table IV.51, some 186 home purchase loans issued in 2008 and after have carried high-annual percentage rates, or 1.0 percent of all owner-occupied home purchase loans issued in the City. The rate of HALs in 2008 was 14.4 percent, however, but has fallen dramatically to 0.1 percent in 2014. Home improvement loans were much more likely to be HALs than home purchase or refinance loans.

Table IV.51         Originated Owner-Occupied Loans by HAL Status         Little Rock         2008–2019 HMDA Data													
Loan Type	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Total
HAL	82	32	0	3	12	11	2	8	12	4	5	15	186
Other	489	498	446	418	1,901	1,964	1,719	1,972	2,284	2,198	2,002	2,103	17,994
Total	571	530	446	421	1,913	1,975	1,721	1,980	2,296	2,202	2,006	2,116	18,177
Percent HAL	14.4%	6.0%	0.0%	0.7%	0.6%	0.6%	0.1%	0.4%	0.5%	0.2%	0.2%	0.7%	1.0%

# F. PUBLICLY SUPPORTED HOUSING ANALYSIS

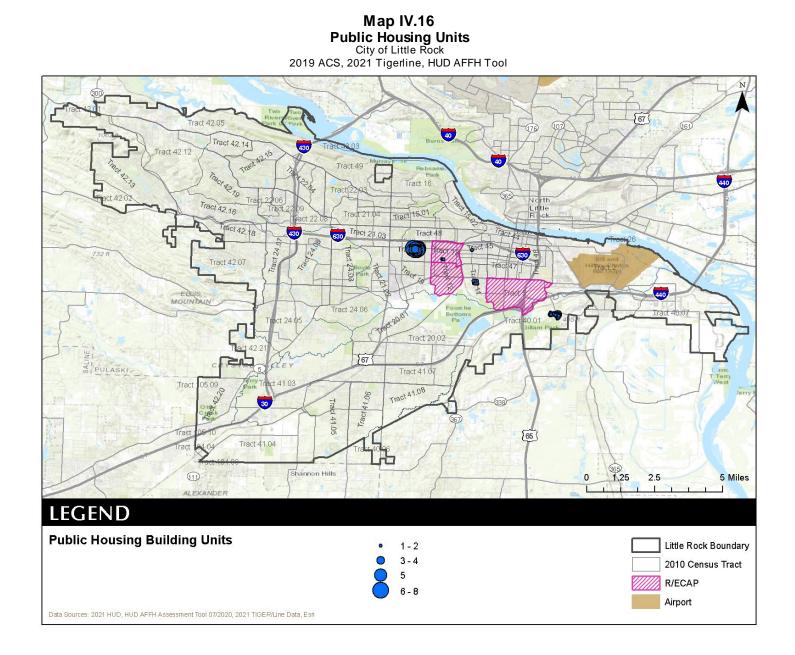
There are a variety of types and locations of public housing units within the City of Little Rock. According to HUD's AFFH data, there are 2,095 total publicly supported units in the City.

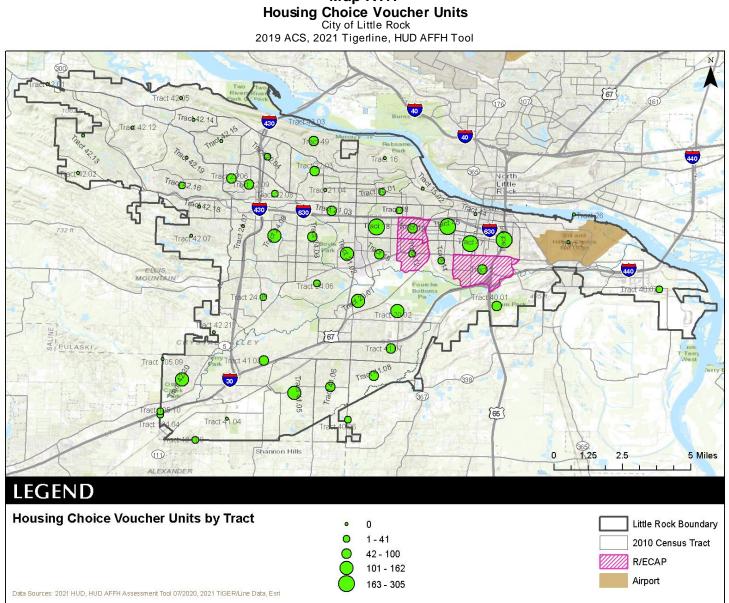
Table IV.52Residents with Disabilities by Subsidized Housing TypeLittle RockHUD AFFH Raw Database									
Program	Total Program Total Disabled Units Units								
Public Housing	0	0							
Project Based Section 8	0	0							
Other HUD Multifamily	0	0							
Housing Choice Vouchers 2,095 490									
Total	Total 2,095 490								

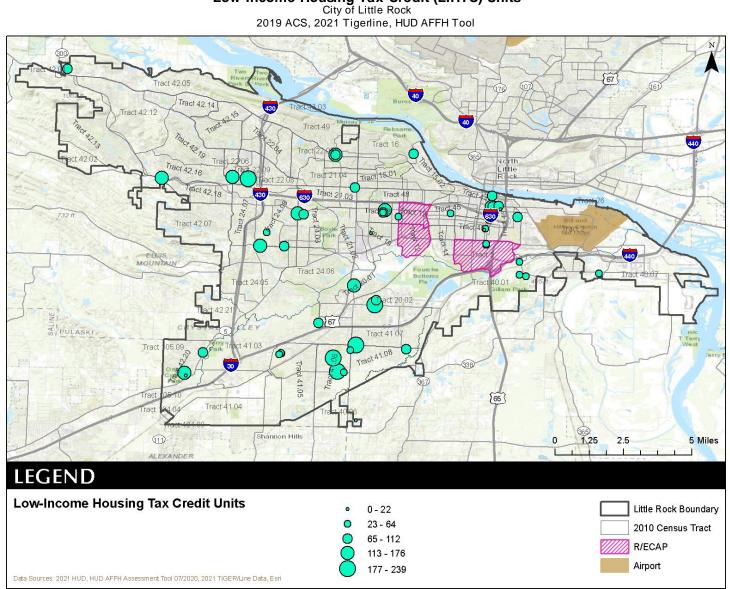
The Housing Authority of the City of Little Rock (LRHA), Arkansas D/B/A Metropolitan Housing Alliance (MHA) was formed in 1941. The Authority has a total of 902 traditional public housing units, with an additional 200 affordable housing units, and 158 market-rate units which are located in mixed finance properties. MHA has an Annual Contributions Contract (ACC) authorization to administer 2,083 Section 8 Housing Choice Vouchers and 179 Veterans Affairs Supportive Housing (VASH) vouchers. Combined MHA provides housing assistance through its various housing programs to some 8,000 individuals.<sup>12</sup>

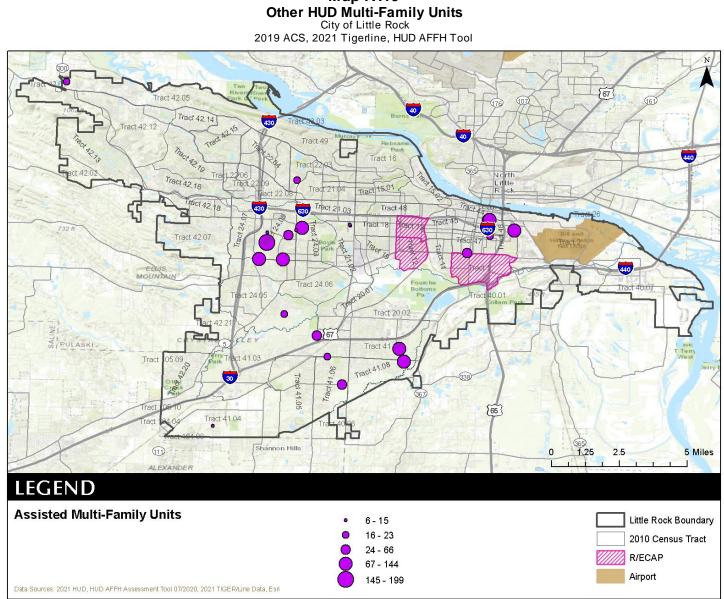
## Disparities in Access to Opportunity

Map IV.16 shows public housing units and Map IV.17 shows housing choice vouchers. Low Income Housing Tax Credit (LIHTC) units are shown in Map IV.18 and Map IV.19 shows other assisted multi-family housing units in the City. The location of these units does not correspond with R/ECAPs in the City.









Map IV.19

# G. DISABILITY AND ACCESS ANALYSIS

Section 504 of the Rehabilitation Act of 1973 prohibits discrimination based on disability in any program or activity receiving federal assistance.<sup>13</sup> Title II of the Americans with Disabilities Act of 1990 prohibits discrimination based on disability by public entities. HUD enforces the housing-related activities of public entities, including public housing, housing assistance, and housing referrals.<sup>14</sup>

### Persons with Disabilities

Disability by age, as estimated by the 2019 ACS, is shown in Table IV.53. The disability rate for females was 13.4 percent, compared to 13.4 percent for males. The disability rate grew precipitously higher with age, with 50.7 percent of those over 75 experiencing a disability.

Table IV.53         Disability by Age         Little Rock         2019 Five-Year ACS Data									
	М	ale	Fe	male	Т	otal			
Age	Disabled	Disability	Disabled	Disability	Disabled	Disability			
	Population	Rate	Population	Rate	Population	Rate			
Under 5	53.0	0.8%	28.0	0.4%	81.0	0.6%			
5 to 17	1,931	11.3%	684.0	4.3%	2,615	8.0%			
18 to 34	1,541	6.5%	1,458	6.0%	2,999	6.3%			
35 to 64	4,997	14.2%	6,082	15.2%	11,079	14.8%			
65 to 74	2,025	28.3%	2,157	23.5%	4,182	25.6%			
75 or Older	2,034	47.5%	3,314	52.9%	5,348	50.7%			
Total	12,581	13.4%	13,723	13.4%	26,304	13.4%			

The number of disabilities by type, as estimated by the 2019 Five-Year ACS, is shown in Table IV.54. An estimated 7.2 percent have an ambulatory disability, 5.8 percent have an independent living disability, and 2.8 percent have a self-care disability.

Table IV.54         Total Disabilities Tallied: Aged 5 and Older         Little Rock         2019 Five-Year ACS									
Disability Type Population with Percent with Disability Disability Disability									
Hearing disability	6,057	3.1%							
Vision disability	4,971	2.5%							
Cognitive disability	11,045	6.0%							
Ambulatory disability 13,103 7.2%									
Self-Care disability 5,110 2.8%									
Independent living disability	8,691	5.8%							

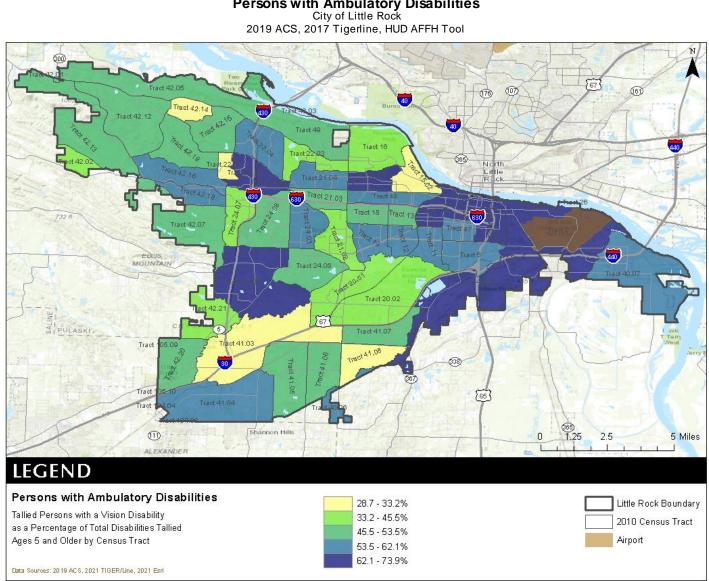
#### Housing Accessibility

Accessible housing units are located throughout the City. However, many newer housing units are located outside city center areas. These newer housing units are more likely to have the mandatory minimum accessibility features. Public input echoed this sentiment, with comments stating that older housing units are less likely to have accessibility features.

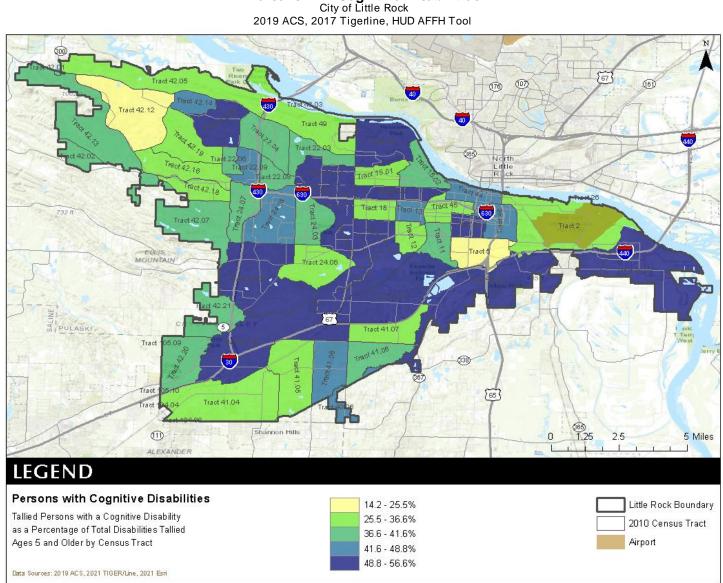
About 23.8 percent of publicly supported housing units, according to HUD's AFFH database, are accessible. This exceeds the rate of disability for the general population in the City. However, this may not meet the needs of the aging population.

Table IV.55Residents with Disabilities by Subsidized Housing TypeLittle RockHUD AFFH Raw Database								
Program Total Total Disabled Uni Units								
Public Housing	0	0						
Project Based Section 8	0	0						
Other HUD Multifamily	0	0						
Housing Choice Vouchers 2,095 490								
Total 2,095 490								

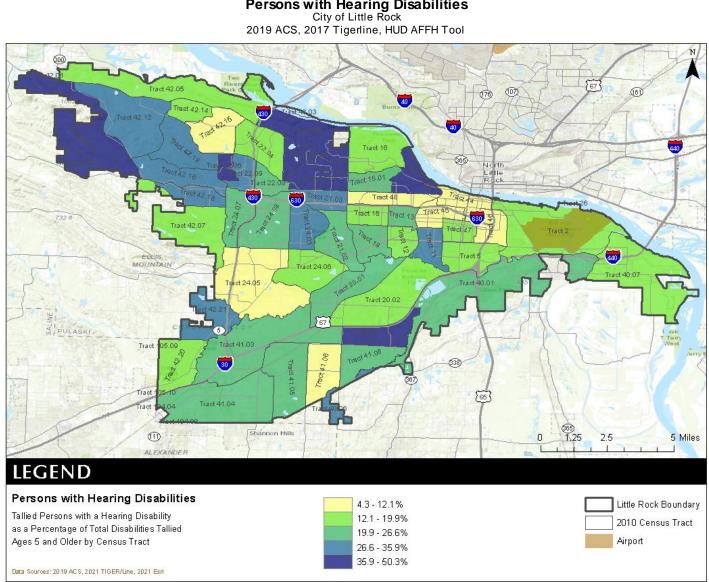
The maps on the following pages show the distribution of households with various disabilities. There does not appear to be a concentration of households by disability type in any one area of the City.

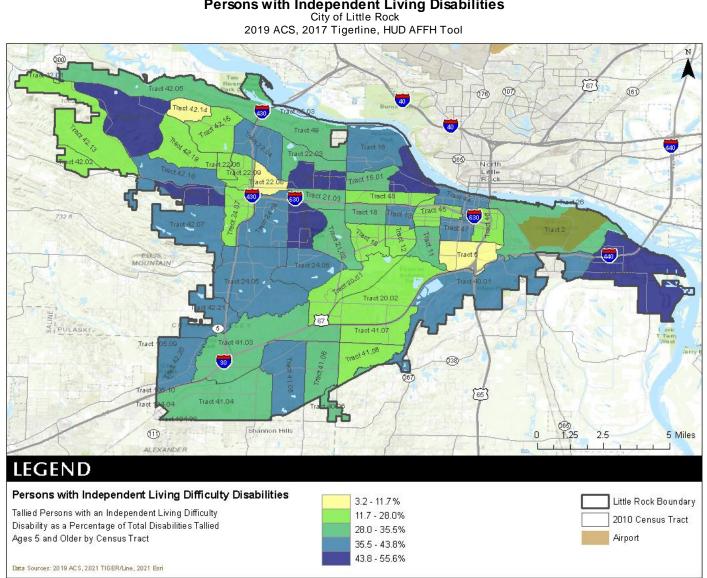


Map IV.20 Persons with Ambulatory Disabilities City of Little Rock

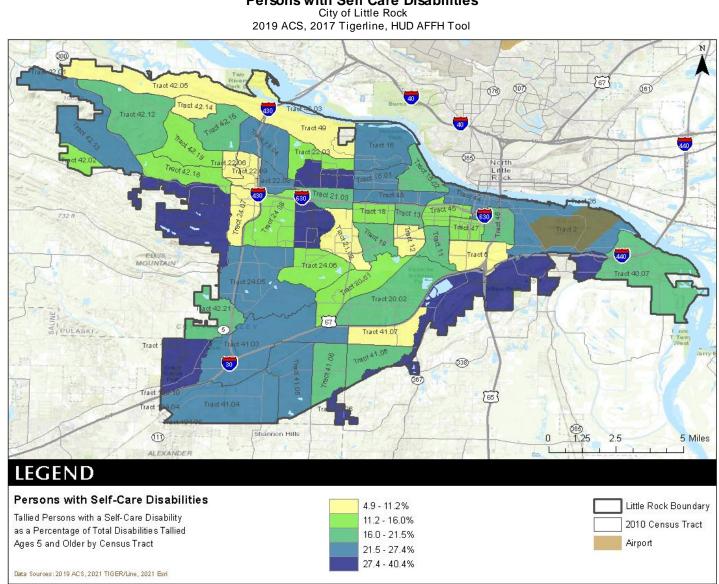


Map IV.21 Persons with Cognitive Disabilities City of Little Rock 2019 ACS, 2017 Tigerline, HUD AFFH Tool

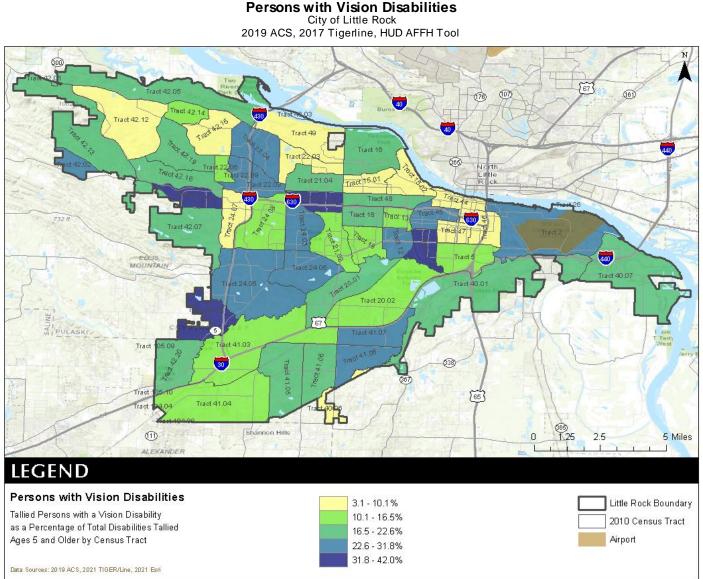




Map IV.23 Persons with Independent Living Disabilities City of Little Rock



Map IV.24 Persons with Self Care Disabilities City of Little Rock



Map IV.25 Persons with Vision Disabilities City of Little Rock

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

## FEDERAL FAIR HOUSING LAWS

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

### Title VIII of the Civil Rights Act of 1968 (Fair Housing Act)<sup>15</sup>

The Fair Housing Act prohibits discrimination in the sale, rental, financing, and insuring of housing on the basis of race, color, religion, sex, and national origin. In 1988, the act was amended to include family status and disability as protected classes, which includes children under the age of 18 living with parents or legal custodians, pregnant women, and persons securing custody of children under the age of 18. Jurisdictions may add protected classes but are not allowed to subtract from the seven federally protected classes.<sup>16</sup> The Act also contains design and construction accessibility provisions for certain new multi-family dwellings developed for first occupancy on or after March 13, 1991.<sup>17</sup> On April 30, 2013, HUD and the Department of Justice released a Joint Statement that provides guidance regarding the persons, entities, and types of housing and related facilities that are subject to the accessible design and construction requirements of the Act.

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

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

The following are examples of Fair Housing Act violations:

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

http://portal.hud.gov/hudportal/HUD?src=/program offices/fair housing equal opp/FHLaws

<sup>&</sup>lt;sup>15</sup> 42 U.S.C. 3601, et. Seq., as amended in 1988

<sup>&</sup>lt;sup>16</sup> "HUD Fair Housing Laws and Presidential Executive Orders."

<sup>&</sup>quot;Title VIII: Fair Housing and Equal Opportunity." http://portal.hud.gov/hudportal/HUD?src=/program offices/fair housing equal opp/progdesc/title8 Little Rock Analysis of Impediments Draft Report for Public Review 5/3/2021 97

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

- 2. Providing inconsistent, lesser, or unequal service to customers or clients who are members of a protected class, such as failing to return calls from a buyer agent to avoid presenting a contract to your seller, avoiding or delaying an appointment for a showing a listing, making keys unavailable, failing to keep appointments, or refusing maintenance or repairs to an apartment.
- 3. Requiring higher standards for a member of a protected class, including asking for more references or demanding a higher credit rating.
- 4. Requiring employers to make distinctions on applications, or in the application process, among protected class members, including marking applications to indicate race, sex, etc. of applicant or misrepresenting availability for particular protected classes.
- 5. Advertising in a manner that indicates a preference for a particular class and thereby excluding protected class members.

## Title VI of the Civil Rights Act of 1964

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

#### Section 504 of the Rehabilitation Act of 1973

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

#### Section 109 of the Housing and Community Development Act of 1974

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

#### Title II of the Americans with Disabilities Act of 1990

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

#### Architectural Barriers Act of 1968

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

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

#### Age Discrimination Act of 1975

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

#### Title IX of the Education Amendments Act of 1972

Title IX prohibits discrimination on the basis of sex or blindness in education programs or activities that receive federal financial assistance.<sup>18</sup>

#### The Home Mortgage Disclosure Act (HMDA)

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

- Bank, credit union, or savings association
- Total assets must exceed the coverage threshold<sup>19</sup>
- The institution must have had a home or branch office in a Metropolitan Statistical Area (MSA)
- The institution must have originated or refinanced at least one home purchase loan secured by a first lien on a one- to four-family dwelling
- The institution must be federally insured or regulated
- The mortgage loan must have been insured, guaranteed, or supplemented by a federal agency or intended for sale to Fannie Mae or Freddie Mac

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

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

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

Little Rock Analysis of Impediments

<sup>&</sup>lt;sup>18</sup> "HUD Fair Housing Laws and Presidential Executive Orders."

<sup>&</sup>lt;sup>19</sup> Each December, the Federal Reserve announces the threshold for the following year. The asset threshold may change from year to year based on changes in the Consumer price Index for Urban Wage Earners and Clerical Workers.

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

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

#### **EXECUTIVE ORDERS**

#### Executive Order 11063 Equal Opportunity in Housing

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

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

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

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

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

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

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

#### Executive Order 13217 Community Based Alternatives for Individuals with Disabilities

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

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

#### STATE FAIR HOUSING LAWS AND RESOURCES

The Arkansas Fair Housing Act is substantially equivalent to the Federal Fair Housing Act and also prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents of legal custodians, pregnant women, and people securing custody of children under the age of 18), and handicap (disability).<sup>20</sup>

#### Arkansas Fair Housing Commission

The Arkansas Fair Housing Commission (AFHC) is a quasi-judicial, regulatory, enforcement agency that works in conjunction with the U.S. Department of Housing and Urban Development to enforce federal and state fair housing and fair lending laws throughout the state.<sup>21</sup>

The only state civil rights enforcement Agency in Arkansas, AFHC's mission is to promote equal housing access and eliminate barriers to integrated communities within Arkansas and to provide a statewide education outreach program to ensure access to fair housing information to providers, lenders, and the public at-large.

#### **Contact Information:**

323 Center Street, Suite 1200 Little Rock, AR 72201 Phone: 501-682-3247 Toll Free Number: 1-800-340-9108

#### Legal Aid of Arkansas

The Fair Housing Project of Legal Aid of Arkansas works to eliminate housing discrimination and to ensure equal housing opportunity for all people through education, outreach, public policy initiatives, advocacy and enforcement.<sup>22</sup>

#### **Contact Information:** 1200 W Walnut Rogers, AR 72756 1-870-338-9834

#### FAIR HOUSING COMPLAINTS

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

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

Little Rock Analysis of Impediments

<sup>&</sup>lt;sup>20</sup> https://www.fairhousing.arkansas.gov/laws/

<sup>&</sup>lt;sup>21</sup> https://www.fairhousing.arkansas.gov/

<sup>&</sup>lt;sup>22</sup> https://arlegalaid.org/what-we-do/justice-projects/fair-housing-project.html

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

Western Economic Services (WES) requested Fair Housing Complaint data from the U.S. Department of Housing and Urban Development (HUD) and the Arkansas Fair Housing Commission. At the date of this draft, these data have not yet been received. WES will continue to contact both agencies and will include the data if it becomes available.

### I. FAIR HOUSING SURVEY RESULTS

The Fair Housing survey has a total of 224 responses. The majority of survey respondents are renters, accounting for 130 respondents, or in the appraisal industry, accounting for 56 respondents.

Table IV.56What is your primary role in the housing industryLittle RockFair Housing Survey									
Role	Total								
Homeowner	0								
Renter	130								
Appraisal	56								
Construction/Development	1								
Insurance	4								
Law/Legal Services	1								
Lending/Mortgage Industry	4								
Local Government	2								
Property Management	5								
Real Estate Sales/Brokerage	1								
Service Provider	2								
Other	8								
Missing	1								
Total	224								

When asked how familiar they are with fair housing laws, most respondents indicated they were at least somewhat familiar.

Table IV.57How familiar are you with Fair Housing LawsLittle RockFair Housing Survey									
Response	Total								
Not Familiar	53								
Somewhat Familiar	127								
Very Familiar	0								
Missing	4								
Total	224								

Most respondents believed that fair housing laws are difficult to understand. About 39 percent of respondents were aware of where to guide someone to file a complaint if they felt their fair housing rights had been violated. Some 50 respondents were aware of fair housing education and training activities in Little Rock. Only 33 respondents have participated in fair housing training. These respondents indicated they have received trainings through a seminar, an online program or webinar, or in a discussion at a meeting.

Table IV.58Federal, State, and Local Fair Housing LawsLittle RockFair Housing Survey Data										
Question	Yes	No	Don't Know	Missing	Total					
Do you think fair housing laws are difficult to understand or follow?	98	64	57	5	224					
Do you know where to guide someone to file a complaint if they felt their fair housing rights had been violated?	88	130	0	6	224					
Outreach and education activities, such as training and seminars, are used to help people better understand their rights and obligations under fair housing law. Are you aware of the educational activities or training opportunities available to you to learn about fair housing laws?	50	163	0	11	224					
If you answered "yes" to the previous question, have you participated in fair housing activities or training?	33	66	0	125	224					

Table IV.59If you have received fair housing training,where did you receive training or how did youreceive training?Little RockFair Housing Survey									
Location	Responses								
Through legal consultant	7								
Online program or webinar	11								
Seminar	19								
Discussion topic at meeting	11								
Local Jurisdiction	9								

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

Table IV.60         Barriers to Fair Housing in the Private Sector         Little Rock         Fair Housing Survey Data											
Question	Yes	No	Don't Know	Missing	Total						
Are you aware of any impediments to fair housing ch	oice in l	_ittle R	ock regarding?								
The home appraisal industry? (Example: Basing home values on the ethnic composition of neighborhoods.)	71	48	81	24	224						
The rental housing market? (Example: Refusing to rent based on religion or color.)	67	63	71	23	224						
The real estate industry? (Example: Only showing properties to families with children in certain areas.)	64	58	80	22	224						
The mortgage and home lending industry? (Example: Offering higher interest rates only to women or racial minorities.)	63	53	86	22	224						
The home insurance industry? (Example: Limiting policies and coverage for racial minorities.)	46	53	103	22	224						
Housing construction and design fields? (Example: New rental complexes built with narrow doorways that do not allow wheelchair accessibility.)	45	59	98	22	224						
Any other housing services?	24	49	88	63	224						

Respondents were most likely to be aware of barriers in the public sector in barriers that limit access to government services. However, most respondents were unaware of impediments.

Table I					
Barriers to Fair Housing		Public Se	ector		
Little R					
Fair Housing S		Nia	De alt Karaa	Missian	Tetal
Question	Yes	No	Don't Know	Missing	Total
Are you aware of any impediments to fair he Barriers that limit access to government services, such as a lack	busing cho		e Rock regarding	]?	
of transportation, employment, or social services?	68	46	60	50	224
The home appraisal industry? (Example: Basing home values on the ethnic composition of neighborhoods.)	54	48	74	48	224
Zoning laws? (Example: Laws that restrict placement of group homes.)	54	45	77	48	224
The public rental housing market? (Example: Refusing to rent based on religion or color.)	52	62	63	47	224
Land use policies? (Example: Policies that concentrate multi- family housing in limited areas.)	52	53	72	47	224
Neighborhood or community development policies? (Example: Policies that encourage development in narrowly defined areas of the community.)	50	46	79	49	224
The mortgage and home lending industry? (Example: Offering higher interest rates only to women or racial minorities.)	48	54	74	48	224
Occupancy standards or health and safety codes? (Example: Codes being inadequately enforced in immigrant communities compared to other areas.)	47	50	80	47	224
The real estate industry? (Example: Only showing properties to families with children in certain areas.)	44	56	76	48	224
Any local government actions or regulations in your community that act as barriers to fair housing choice?	44	52	78	50	224
The home insurance industry? (Example: Limiting policies and coverage for racial minorities.)	39	54	83	48	224
Property assessment and tax policies? (Example: Lackof tax incentives for making reasonable accommodations or modifications for persons with disabilities.)	39	49	88	48	224
The permitting process? (Example: Not offering written documents on procedures in alternate languages.)	34	46	97	47	224
Housing construction standards? (Example: Lack of or confusing guidelines for construction of accessible housing.)	32	50	93	49	224
Publicly constructed housing? (Example: New rental complexes built with narrow doorways that do not allow wheelchair accessibility.)	31	58	84	51	224

When asked if various factors are happening in Little Rock, respondents were most likely to find that lack of access to affordable housing has a significant impact. This is followed by lack of access to mental health care, and lack of access to good nutrition, healthy food, fresh vegetables, etc.

Table IV.62         Fair Housing in the Public Sector         Little Rock         Fair Housing Survey												
Question	Not at all	Slightly	Moderately	Significantly	Don't Know	Missing	Total					
Are you and/or your o	community aff	ected by lack	of access to a	ny of these factor	s listed belo	w?						
Access to affordable housing         37         20         30         61         28         48         20												
Access to mental health care	44	16	35	56	25	48	224					
Access to good nutrition, healthy food, fresh vegetables, etc	61	25	31	53	7	47	224					
Access to affordable Public Housing	36	11	24	52	53	48	224					
Access to public transportation to schools, work, health care, services	48	28	44	47	10	47	224					
Access to proficient Public Schools	42	21	37	44	31	49	224					
Access for seniors and/or people with disabilities to public transportation	32	21	42	44	36	49	224					
Access to education about fair housing laws	36	17	27	40	52	52	224					
Access to school choice	49	20	32	35	35	53	224					
Access for acceptance of housing choice vouchers	32	9	26	31	77	49	224					
Access to parks, libraries, other public facilities	68	34	38	29	7	48	224					
Access to health care	70	25	38	29	11	51	224					

Respondents indicated that concentrations of poverty and a greater share of housing problems for those at lower incomes, of a specific race or ethnicity or national origin, disability, gender, or family status were significantly impacting the community. This was followed by concentrations of racial or ethnic minorities, and differences in access to housing opportunities for people of various income, races, ethnicity, genders, and family status.

Table IV.63         Fair Housing in the Public Sector         Little Rock         Fair Housing Survey												
Question	Not at all	Slightly	Moderately	Significantly	Don't Know	Missing	Total					
Do you believe these issues are happening in Little Rock? If so, how much are the issues impacting your community?												
Concentrations of poverty	10	12	30	113	11	48	224					
Greater share of housing problems for those at lower incomes, of a specific race or ethnicity or national origin, disability, gender, or family status.	8	6	31	112	18	49	224					
Concentrations of racial or ethnic minorities	15	11	36	102	10	50	224					
Differences in access to housing opportunities for people of various income, races, ethnicity, genders, family status	10	12	38	93	21	50	224					
Segregation	11	18	36	89	12	58	224					
Lack of affordable rental housing	12	20	38	80	22	52	224					
Lack of affordable single-family houses	10	19	38	78	29	50	224					
Challenges for persons with disabilities	7	14	38	76	40	49	224					
Gentrification and displacement due to economic pressures	15	23	35	67	35	49	224					
Lack of housing discrimination enforcement	20	9	26	54	65	50	224					
No or limited education about fair housing laws	11	14	27	54	67	51	224					
Lack of acceptance of housing choice vouchers	11	9	15	41	98	50	224					

## J. MUNICIPAL AND ZONING CODE REVIEW

A review of the City Zoning and Municipal Code was conducted in order to review if there are any barriers in the city's regulations that may impede access to housing. The following narrative is a description of any language or statutes that may act a barrier to fair housing choice.

This review gauged zoning and code regulations that may encourage or limit fair housing choice within the study area. The Municipal Code was review for definitions of dwelling unit, disability, and family. The use of the word family, including a strict definition of family, or limiting the number of people in "family," may limit housing choices within a jurisdiction. The review included the allowance of mixed-use and conditional uses, which may increase opportunities for the development of more affordable housing choices. The review also asked about any policies that encourage the development of affordable housing, as well as any policies that promote fair housing within their communities. The review also sought to ascertain any restrictions to group housing and housing for seniors, including definitions and where these units may be permitted.

The following definitions were identified in the City's Zoning Code.

**Dwelling or Dwelling Unit:** Dwelling or dwelling unit means any room or group of rooms located within a structure forming a single habitable unit with facilities which are used or intended to be used for living, sleeping, cooking, eating and sanitation by one (1) family.

**Family:** Family means, in addition to customary domestic servants, the following: (1)An individual or two (2) or more persons related by blood, marriage or adoption, maintaining a common household in a dwelling unit; or (2)A group of not more than four (4) persons who are not related by blood, marriage or adoption, living together as a common household in a dwelling unit. This definition of family is established for the purpose of preserving the character of residential neighborhoods by controlling population density, noise disturbance and traffic congestion, and shall not be applied so as to prevent the city from making reasonable accommodation where the city determines it necessary to afford handicapped persons living together in a household equal access to housing pursuant to the federal Fair Housing Amendments Act of 1988.

The City allows mixed-use housing in some zoning districts, including Urban Use (UU) and PZD areas. In addition, some zoning categories, O-1, C-1, C-3, etc. allow for single family and multifamily as permitted uses

The City does not have any policies in the zoning ordinance or regulations in the Planning & Development Department to encourage the development of affordable housing units.

The City Planning & Development Department commented that there are not currently and inclusionary policies. The respondent also indicated that there has not been any noted difficulty for person to access assisted housing in the City for protected classes.

In order to report a code violation, complainants are able to contact the City's 311 system, or email or write directly to the City. For environmental codes or life safety for rental properties can also report to the "Neighborhood Resource Center" enforcement officer and/or facilitator.

In addition, the Planning & Development Department commented that the City's zoning does not restrict minimum house and lot sizes as suggested in the public input meetings. The City's

subdivision code allows for small lots in addition to R-2 lots of 7,000 sf minimum and R-3 lots of 5,000 sf minimum. For smaller lots or zero-lot line lots the Planned Development process is often used. If a person or entity had more than one lot contiguous, it may be possible for the lots to be subdivided for individual ownership. Additional information can be found in the City's Zoning Code, as well as in the City's Housing Code and Building Code.

Public Input suggested the difficulty in building more affordable units based on the strict standards of building in the City, as well as the limitation of historic neighborhoods. These were indicated as barriers by participants in the Focus Groups and Public Input Meeting. Minimum lot and home size were also indicated as barriers, although an examination of the City's codes revealed this may not be a driving factor in limiting development.

### Summary

The review of the City's code and ordinances did not reveal any obvious obstructions to the development of affordable housing. However, the City may review its current policies to identify ways to encourage the development of affordable housing though incentives and inclusionary policies.

# Section V. Fair Housing Goals and Priorities

### Overview

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

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

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

### Assessing Fair Housing

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

In 1994, HUD published a rule consolidating plans for housing and community development programs into a single planning process. This action grouped the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grants (ESG)<sup>23</sup>, and Housing Opportunities for Persons with AIDS (HOPWA) programs into the Consolidated Plan for Housing and Community Development, which then created a single application cycle. As a part of the consolidated planning process, and entitlement communities that receive such funds from HUD are required to submit to HUD certification that they are affirmatively furthering fair housing (AFFH). This was described in the Analysis of Impediments to Fair Housing Choice and a Fair Housing Planning Guide offering methods to conduct such a study was released in March of 1993.

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

<sup>&</sup>lt;sup>23</sup> The Emergency Shelter Grants program was renamed the Emergency Solutions Grants program in 2011.

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

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

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

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

### **Overview of Findings**

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

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

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

Table V.1         Contributing Factors         City of Little Rock										
Contributing Factors	Priority	Justification								
Moderate to high levels of ægregation	Low	African American and Hispanic households have moderate to high levels of segregation, according to the Dissimilarity Index. American Indian, Native Hawaiian, and "other" race households had moderate or high levels of segregation. However, these racial groups represent a small percentage of the population, less than one percent each.								
Access to low poverty areas and concentrations of poverty	Med	Low poverty index is markedly lower for African American and Hispanic populations than white low poverty access, indicating inequitable access to low poverty areas. In addition, there are concentrations of poverty in central Little Rock.								
Access to labor market engagement	Low	African American and Hispanic households have less access to labor market engagement as indicated by the Access to Opportunity index. However, the City has little control over impacting labor market engagement on a large scale.								
Access to school proficiency	Med	African American and Hispanic households have lower levels of access to proficient schools in Little Rock. This also varied geographically with school proficiency index ratings that were lower in central Little Rock.								
Insufficient affordable housing in a range of unit sizes	High	Some 31.5 percent of households have cost burdens. This is more significant for renter households, of which 45.2 percent have cost burdens. This signifies a lack of housing options that are affordable to a large proportion of the population.								
African American, Hispanic, Native American, and Native Hawaiian/Pacific Islander households with disproportionate rates of housing problems	High	The average rate of housing problems, according to CHAS data is 33.1 percent, according to CHAS data. African American households face housing problems at a rate of 43.0 percent. Hispanic households face housing problems at a rate of 43.5 percent.								
Discriminatory patterns in Lending	Med	The mortgage denial rates for African American and Hispanic applicants are higher than the jurisdiction average according to 2008-2019 HMDA data. The denial rates for African American applicants are 11.6 percentage points higher than the jurisdiction average, and Hispanic denial rates were 8.3 percentage points higher than non-Hispanic applicants.								
Insufficient accessible affordable housing	High	The number of accessible affordable units may not meet the need of the growing elderly and disabled population, particularly as the population continues to age. Some 50.7 percent of persons aged 75 and older have at least one form of disability.								
NIMBYism	High	Public input suggested one of the major barriers to the development of affordable housing options in the City was the Not In My Back Yard (NIMBY) mentality in the City.								
Lack of fair housing infrastructure	High	The fair housing survey and public input indicated a lack of collaboration among agencies to support fair housing.								
Insufficient fair housing education	High	The fair housing survey and public input indicated a lack of knowledge about fair housing and a need for education.								
Insufficient understanding of credit	High	The fair housing survey and public input indicated an insufficient understanding of credit needed to access mortgages.								

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

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

		Table V.2	
Fair Housing Goal	Fair Housing Issue(s)	Impediments to Fair Housing Choice/ Contributing Factors	Recommended Actions
Promote affordable homeow nership and rental opportunities outside of R/ECAPs	Segregation R/ECAPs Disproportionate Housing Needs Publicly Supported Housing	Moderate to high levels of segregation Inequitable access to proficient schools and labor market engagement Insufficient affordable housing in a range of unit sizes Discriminatory patterns in Lending Inequitable access to low poverty areas and concentrations of poverty	Continue to promote homeownership and affordable rental opportunities outside of R/ECAPs with the use of CDBG and HOME funds. Over the next five (5) years: 375 Homeowner Housing Rehabilitated 20 New Construction Developed 5 Houses Acquired & Rehabilitated 75 Homeowner provided Down payment assistance
Promote Community Development activities in areas with higher rates of poverty	Disparities in Access to Opportunity	Moderate to high levels of segregation Inequitable access to proficient schools and labor market engagement Inequitable access to low poverty areas and concentrations of poverty	Continue to promote public services, public facilities, and infrastructure improvements with CDBG funds in low to moderate income neighborhoods or to benefit LMI households. Over the next five (5) years: Benefit 75,000 households with improved access to public services
Promote community and serv ice prov ider know ledge of ADA laws	Disability and Access Publicly Supported Housing	Insufficient accessible affordable housing	Increase outreach and education for housing providers in the City, focusing on legal requirements concerning reasonable accommodation, in coordination with local disability advocate organizations and Legal Aid of Arkansas. Record activities annually.
Increase outreach and education for housing prov iders in the City and the public	Fair Housing Enforcement and Outreach Publicly Supported Housing	Discriminatory patterns in Lending Lack of fair housing infrastructure Insufficient fair housing education Insufficient understanding of credit	Continue to conduct fair housing outreach and education targeting rental tenants, providing an overview of fair housing laws and examples of discrimination that housing consumers may encounter in the rental housing market. Promote education through website and online materials, as well as printed materials at City offices and community centers/libraries. Continue working with the Arkansas Fair Housing Commission and Legal Aid to promote fair housing and process complaints Record activities annually.

Fair Housing Goals and Priorities

## Section VI. Appendices

## A. ADDITIONAL PLAN DATA

Table VI.1           Loan Applications by Reason for Denial by Race/Ethnicity of Applicant           Little Rock           2008–2019 HMDA Data											
Denial Reason	American Indian	Asian	Black	Pacific Islander	White	Not Av ailable	Not Applicable	Total	Hispanic (Ethnicity)		
Debt-to-Income Ratio	3	22	207	1	165	38	0	437	3		
Employment History	0	6	14	0	18	1	0	39	0		
Credit History	5	8	307	0	156	64	0	540	5		
Collateral	2	3	65	1	134	21	0	226	2		
Insufficient Cash	1	1	45	0	27	12	0	86	1		
Unverifiable Information	0	14	17	1	41	6	0	80	0		
Credit Application Incomplete	1	8	30	1	72	12	0	124	1		
Mortgage Insurance Denied	0	0	0	0	0	1	0	1	0		
Other	1	6	71	2	67	22	0	169	1		
Missing	2	29	394	3	293	60	0	781	115		
Total	15	97	1,150	9	973	237	0	2,483	128		
% Missing	13.3%	29.9%	34.3%	33.3%	30.1%	25.3%	%	31.5%	89.8%		

Table VI.2         Denial Rates by Income of Applicant         Little Rock         2008–2019 HMDA Data													
Income	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Total
\$30,000 or Below	32.4%	29.7%	23.9%	27.2%	24.9%	31.1%	38.0%	30.0%	27.2%	24.5%	35.2%	24.0%	28.9%
\$30,001-\$50,000	24.3%	14.2%	17.2%	14.6%	15.8%	17.5%	17.1%	12.1%	15.2%	15.5%	14.9%	13.5%	15.8%
\$50,001-\$75,000	18.1%	19.0%	12.8%	15.6%	9.1%	11.8%	11.2%	13.2%	9.5%	8.6%	9.2%	8.1%	10.6%
\$75,001-\$100,000	16.7%	2.9%	3.2%	12.8%	6.2%	9.1%	6.3%	4.0%	7.1%	7.2%	4.9%	5.9%	6.5%
\$100,001-\$150,000	7.1%	12.5%	5.0%	9.4%	7.4%	6.0%	8.2%	5.3%	6.2%	9.3%	6.5%	5.1%	6.8%
Above \$150,000	17.6%	4.1%	12.8%	6.1%	4.7%	5.9%	7.7%	5.0%	4.6%	3.6%	4.4%	4.9%	5.2%
Data Missing	0.0%	0.0%	0.0%	%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	11.1%	14.3%	3.6%
Total	24.0%	18.6%	17.3%	17.5%	11.3%	12.6%	13.4%	10.6%	10.8%	10.1%	10.8%	8.8%	12.0%

				Loans		Table N n Purpo Little Ro 8–2019 HM	<b>ose by H</b>	AL Stat	us					
Loan Purpose		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Total
	HAL	82	32	0	3	12	11	2	8	12	4	5	15	186
Home Purchase	Other	489	498	446	418	1,901	1,964	1,719	1,972	2,284	2,198	2,002	2,103	17,994
	Percent HAL	14.4%	6.0%	0.0%	0.7%	0.6%	0.6%	0.1%	0.4%	0.5%	0.2%	0.2%	0.7%	1.0%
	HAL	25	20	11	5	15	14	10	7	13	4	22	28	174
Home Improvement	Other	113	68	55	46	251	294	228	265	299	252	210	173	2,254
	Percent HAL	18.1%	22.7%	16.7%	9.8%	5.6%	4.5%	4.2%	2.6%	4.2%	1.6%	9.5%	13.9%	1.0%
	HAL	128	57	6	9	25	27	10	4	9	7	16	21	319
Refinancing	Other	339	611	587	470	3,558	2,434	1,082	1,317	1,568	969	788	1,138	14,861
	Percent HAL	27.4%	8.5%	1.0%	1.9%	0.7%	1.1%	0.9%	0.3%	0.6%	0.7%	2.0%	1.8%	1.0%
	HAL	235	109	17	17	52	52	22	19	34	15	63	91	726
Total	Other	941	1,177	1,088	934	5,710	4,692	3,029	3,554	4,151	3,419	3,147	3,584	35,426
	Percent HAL	20.0%	8.5%	1.5%	1.8%	0.9%	1.1%	0.7%	0.5%	0.8%	0.4%	2.0%	2.5%	2.0%

			HAI		inated	le Rock	e of Bo	orrower					
Race	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Total
American Indian	0	0		0	0	0	0	0	0	0	0	0	0
Asian	1	0		0	0	0	0	0	0	0	0	1	2
Black	38	14		0	0	1	1	2	1	1	3	5	66
Pacific Islander	0	0		0	0	0	0	0	0	0	0	0	0
White	33	17		3	12	10	1	6	10	3	1	6	100
Not Available	10	0		0	0	0	0	0	1	0	0	1	12
Not Applicable	0	1		0	0	0	0	0	0	0	0	0	1
Total	82	32	0	3	12	11	2	8	12	4	5	15	186
Hispanic	4	1		0	1	1	0	0	1	1	0	1	522
Non-Hispanic	67	30		3	11	9	2	8	10	3	4	10	16,682

	Table VI.5         Rate of HALs Originated by Race/Ethnicity of Borrower         Little Rock         2008–2019 HMDA Data													
Race	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Average	
American Indian	%	0.0%	%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
Asian	16.7%	0.0%	%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.0%	0.3%	
Black	13.4%	5.4%	%	0.0%	0.0%	0.3%	0.3%	0.6%	0.2%	0.3%	0.8%	1.4%	1.8%	
Pacific Islander	0.0%	0.0%	%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
White	13.4%	7.0%	%	1.4%	0.8%	0.7%	0.1%	0.4%	0.6%	0.2%	0.1%	0.4%	0.8%	
Not Available	29.4%	0.0%	%	0.0%	0.0%	0.0%	0.0%	0.0%	1.5%	0.0%	0.0%	0.6%	1.7%	
Not Applicable	%	100.0%	%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	%	0.0%	%	7.7%	
Average	14.4%	6.0%	0.0%	0.7%	0.6%	0.6%	0.1%	0.4%	0.5%	0.2%	0.2%	0.7%	1.0%	
Hispanic	14.8%	4.8%	%	0.0%	2.0%	2.4%	0.0%	0.0%	1.5%	1.7%	0.0%	1.4%	1.9%	
Non-Hispanic	13.2%	6.1%	%	0.8%	0.6%	0.5%	0.1%	0.4%	0.5%	0.1%	0.2%	0.5%	0.9%	

			Loans b	y HAL	Status k	able VI. by Race	/Ethnici	ty of Bo	orrower					
						Little Rock								
Race	Loan Type	2008	2009	2010	2008–2 2011	2019 HMD	2013	2014	2015	2016	2017	2018	2019	Total
Race				2010	-	-		-			-			
	HAL	0	0		0	0	0	0	0	0	0	0	0	0
American Indian	Other	0	1	2	2	1	6	1	5	13	5	8	10	53
	Percent HAL	%	0.0%	%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
	HAL	1	0	_	0	0	0	0	0	0	0	0	1	2
Asian	Other	5	5	8	6	91	85	58	87	109	95	77	97	721
	Percent HAL	16.7%	0.0%	%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.0%	0.3%
	HAL	38	14		0	0	1	1	2	1	1	3	5	66
Black	Other	245	245	222	192	293	309	297	354	403	383	353	354	3,650
	Percent HAL	13.4%	5.4%	%	0.0%	0.0%	0.3%	0.3%	0.6%	0.2%	0.3%	0.8%	1.4%	1.8%
	HAL	0	0		0	0	0	0	0	0	0	0	0	0
Pacific Islander	Other	1	3	0	3	1	1	1	5	4	4	2	4	29
	Percent HAL	0.0%	0.0%	%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
	HAL	33	17		3	12	10	1	6	10	3	1	6	100
White	Other	214	227	196	209	1,463	1,513	1,321	1,456	1,687	1,616	1,421	1,472	12,747
	Percent HAL	13.4%	7.0%	%	1.4%	0.8%	0.7%	0.1%	0.4%	0.6%	0.2%	0.1%	0.4%	0.8%
	HAL	10	0		0	0	0	0	0	1	0	0	1	12
Not Available	Other	24	17	17	5	51	47	40	64	66	95	133	157	3,650
	Percent HAL	29.4%	0.0%	%	0.0%	0.0%	0.0%	0.0%	0.0%	1.5%	0.0%	0.0%	0.6%	1.7%
	HAL	0	1		0	0	0	0	0	0	0	0	0	1
	Other	0	0	1	1	1	3	1	1	2	0	2	0	12
Not Applicable	Percent HAL	%	100.0 %	%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	%	0.0%	%	7.7%
	HAL	82	32	0	3	12	11	2	8	12	4	5	15	186
Total	Other	489	498	446	418	1,901	1,964	1,719	1,972	2,284	2,198	2,002	2,103	17,994
	Percent HAL	14.4%	6.0%	0.0%	0.7%	0.6%	0.6%	0.1%	0.4%	0.5%	0.2%	0.2%	0.7%	1.0%
	HAL	4	1	0.070	0	1	1	0	0.470	1	1	0.270	1	522
Hispanic	Other	23	20	20	17	49	41	39	47	66	59	72	70	10
	Percent HAL	14.8%	4.8%	%	0.0%	2.0%	2.4%	0.0%	0.0%	1.5%	1.7%	0.0%	1.4%	1.9%
	HAL	67	30		3	11	9	2	8	10	3	4	10	16,682
Non-Hispanic	Other	441	465	411	395	1,798	1,877	1,633	1,860	2,156	2,049	1,782	1,866	155
	Percent HAL	13.2%	6.1%	%	0.8%	0.6%	0.5%	0.1%	0.4%	0.5%	0.1%	0.2%	0.5%	0.9%

	Table VI.7         Rates of HALs by Income of Borrower         Little Rock         2008–2019 HMDA Data												
Income	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Average
\$30,000 or Below	21.4%	6.0%	%	0.0%	0.0%	0.7%	0.9%	0.0%	0.5%	0.7%	0.8%	0.8%	2.6%
\$30,001-\$50,000	12.4%	3.6%	%	0.0%	0.0%	0.2%	0.3%	0.4%	0.4%	0.5%	0.7%	0.8%	1.2%
\$50,001-\$75,000	9.6%	1.2%	%	0.0%	0.8%	0.4%	0.0%	0.0%	0.2%	0.0%	0.0%	0.2%	0.5%
\$75,001-\$100,000	14.3%	8.8%	%	0.0%	1.0%	0.0%	0.0%	0.3%	0.6%	0.0%	0.0%	0.6%	0.6%
\$100,00-150,000	11.5%	14.3%	%	3.4%	0.7%	0.6%	0.0%	0.6%	0.3%	0.0%	0.0%	0.3%	0.6%
Above \$150,000	14.3%	17.0%	%	4.3%	1.2%	1.4%	0.0%	0.9%	1.0%	0.2%	0.0%	1.1%	1.1%
Data Missing	25.0%	100.0%	0.0%	%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	11.1%	25.0%	8.8%
Average	14.4%	6.0%	0.0%	0.7%	0.6%	0.6%	0.1%	0.4%	0.5%	0.2%	0.2%	0.7%	1.0%

			Loan	s by H/	AL Stati	ible VI. Js by In	icome o	of Borro	ower					
						019 HMD								
Income		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Total
	HAL	30	9		0	0	1	1	0	1	1	1	1	45
\$30,000	Other	110	140	140	118	202	145	115	152	200	138	126	129	1,715
orBelow	Percent HAL	21.4%	6.0%	%	0.0%	0.0%	0.7%	0.9%	0.0%	0.5%	0.7%	0.8%	0.8%	2.6%
	HAL	29	7		0	0	1	1	2	2	2	3	3	50
\$30,001	Other	205	186	154	129	427	418	393	465	449	419	404	357	4,006
-\$50,000	Percent HAL	12.4%	3.6%	%	0.0%	0.0%	0.2%	0.3%	0.4%	0.4%	0.5%	0.7%	0.8%	1.2%
	HAL	10	1		0	3	2	0	0	1	0	0	1	18
\$50,001	Other	94	84	68	65	385	453	380	376	458	490	463	485	3,801
-\$75,000	Percent HAL	9.6%	1.2%	%	0.0%	0.8%	0.4%	0.0%	0.0%	0.2%	0.0%	0.0%	0.2%	0.5%
	HAL	5	3		0	3	0	0	1	2	0	0	2	16
\$75,001	Other	30	31	30	34	286	251	253	311	337	337	273	335	2,508
-\$100,000	Percent HAL	14.3%	8.8%	%	0.0%	1.0%	0.0%	0.0%	0.3%	0.6%	0.0%	0.0%	0.6%	0.6%
	HAL	3	3		1	2	2	0	2	1	0	0	1	15
\$100,001	Other	23	18	19	28	273	328	270	322	362	352	333	353	2,681
-150,000	Percent HAL	11.5%	14.3%	%	3.4%	0.7%	0.6%	0.0%	0.6%	0.3%	0.0%	0.0%	0.3%	0.6%
	HAL	4	8		2	4	5	0	3	5	1	0	5	37
Above	Other	24	39	34	44	323	362	300	340	474	458	395	438	3,231
\$150,000	Percent HAL	14.3%	17.0%	%	4.3%	1.2%	1.4%	0.0%	0.9%	1.0%	0.2%	0.0%	1.1%	1.1%
	HAL	1	1		0	0	0	0	0	0	0	0	0	5
Data	Other	3	0	1	0	5	7	8	6	4	4	8	6	52
Missing	Percent HAL	25.0%	100.0%	0.0%	%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	11.1%	25.0%	8.8%
	Other	82	32	0	3	12	11	2	8	12	4	5	15	186
	HAL	489	498	446	418	1,901	1,964	1,719	1,972	2,284	2,198	2,002	2,103	17,994
Total	Percent HAL	14.4%	6.0%	0.0%	0.7%	0.6%	0.6%	0.1%	0.4%	0.5%	0.2%	0.2%	0.7%	1.0%

Total	Househo	lds with S	Severe H	able VI.9 Housing Pro Little Rock 16 HUD CHAS		Income and	d Race	
			Non-H	ispanic by Rad	e			
Income	White	African America n	Asian	American Indian	Pacific Islander	Other Race	Hispanic (Any Race)	Total
			/ith A Sev	ere Housing P	roblem			
\$0 to \$20,880	1,865	4,375	95.0	25.0	0	165	390	6,915
\$20,881 to \$34,800	1,485	1,805	80.0	0	0	60	125	3,555
\$34,801 to \$55,680	795	590	4.0	0	0	35.0	160	1,584
\$55,681 to \$69,600	230	180.0	0	0	0	0	4.0	414
Above \$69,600	565	265	55.0	0	0	10.0	100	995
Total	4,940	7,215	234	25	0	270	779	13,463
		With	nout A Sev	vere Housing F	Problems			
\$0 to \$20,880	605	1,775	4.0	0	0	65.0	215	2,664
\$20,881 to \$34,800	2,360	3,420	40.0	0	0	105	540	6,465
\$34,801 to \$55,680	4,510	6,690	130	0	0	275	690	12,295
\$55,681 to \$69,600	3,750	3,355	200.0	10.0	0	140	585	8,040
Above \$69,600	24,415	8,495	1,295	65	30.0	735	755	35,790
Total	35,640	23,735	1,669	75	30.0	1,320	2,785	65,254
			No	ot Computed				
\$0 to \$20,880	600	645	95.0	50.0	0	75.0	85	1,550
\$20,881 to \$34,800	0	0	0	0	0	0	0	0
\$34,801 to \$55,680	0	0	0	0	0	0	0	0
\$55,681 to \$69,600	0	0	0	0	0	0	0	0
Above \$69,600	0	0	0	0	0	0	0	0
Total	600	645	95.0	50.0	0	75.0	85	1,550
				Total				
\$0 to \$20,880	3,070	6,795	194	75.0	0	305	690	11,129
\$20,881 to \$34,800	3,845	5,225	120	0	0	165	665	10,020
\$34,801 to \$55,680	5,305	7,280	134	0	0	310	850	13,879
\$55,681 to \$69,600	3,980	3,535	200	10.0	0	140	589	8,454
Above \$69,600	24,980	8,760	1,350	65	30.0	745	855	36,785
Total	41,180	31,595	1,998	150	30	1,665	3,649	80,267

## **B.** PUBLIC INPUT DATA

### Fair Housing Forum

Presentation

**Comment:** Lack of opportunity due to the area they're living being impoverished.

**Presenter:** And with that comment, do you mean more of the lack of opportunity for employment that can support their housing?

**Comment:** Employment for sure.

**Comment:** Will you be able to share the mortgage lending data with legal aid?

**Presenter:** The mortgage data will be included in this report, and that will be shared publicly. So that will definitely be accessible to you.

**Comment:** That one of the barriers with lack of opportunity is education as well.

Presenter: Thank you.

**Comment:** So, so we have a fair housing office that services all of Arkansas, but our but our legal aid practice area actually doesn't include Little Rock. So we tend to not really have that many cases, even fair housing cases in Little Rock. We have generally seen that disability cases have been a big issue, specifically emotional support animal denials, and things like that. That's been a really like a common theme for us. Another common theme actually, unfortunately, has been some sex harassment, and sex discrimination. We've seen a little uptick in that. And, you know, I don't have anything to show this. But I think that may have something to do with Me Too movement, and just general, you know, generally more knowledge about those things and a little more understanding and compassion about them.

**Presenter:** Thank you. Are there any other comments about what you see as barriers for accessing housing?

**Comment:** I can point out one thing that may not be immediately obvious to some people. You mentioned that the housing stock in low rock is relatively older and for people with disabilities, most of that housing is going to be before there were accessibility standards being applied to apartments. So that could have an impact.

Presenter: Thank you.

**Comment:** Groups, those with diagnosed mental health issues.

**Comment:** Thank you. Do you have a comment?

**Comment:** Yeah, so I I'm actually right across the hall from her, I was I was gonna say something kind of along that same vein that while most of the work we do is not in Little Rock, though, we are upping our education outreach efforts around here to try and get more cases from the area. But yeah, I would say, the vast majority of work that we see, or of cases that we see has to do with some form of disability discrimination. I think I think part of that sort of comes from that you can,

landlords can sort of like fall into that without knowing that's what they're doing. And I mean, in and you see in the data here, I mean, I feel like that many of the cases that we've gotten from the Little Rock area have had something to do with that. And it's pretty unsurprising to see that that most of the senior population does have some form of disability as well, you know, as far as barriers are concerned, because I mean, I do live here and I've lived here for several years now, it was very interesting for me to see the amount of cost burden folks in the area, especially given the fact that, like cost of living here tends to be lower than other cities. I mean, could could this be maybe a lack of, you know, availability and low income housing or a lack of, you know, just just rental rates that folks can afford? I feel like that's also a large issue, just not necessarily in the discrimination realm, but just housing in general in Little Rock.

**Comment:** Thank you. Yeah, we, we had a focus group earlier this week that was focused on a Consolidated Plan and housing and that was brought up that the older housing stock, there may be rehabilitation, but also there just isn't a lot of housing in the lower price points for households in the community. So thank you for those comments.

**Presenter:** I know that you mentioned this, but this can go to anybody as well. Is there a need in the community for more outreach and education on fair housing and kind of what's your what your rights are and where you can go, if you feel like you have been discriminated against?

**Comment:** I'm, I'm a tad biased, because I am the education outreach attorney here at our office. So I always think that there needs to be more. But yeah, I any, any opportunities that we could sort of take advantage of with the city or with anybody else who happens to be on the call? You know, yeah, we would certainly be willing to do that. And I'd love to hear from somebody else, kind of different areas that we may be able to target to help those efforts.

**Comment:** You were saying that you hadn't had a lot of calls from citizens in Little Rock. I was wondering because I know, since have we've been doing since COVID, I have referred some people call so they are read and their landlord, so you didn't get an uptick in people, oh, needing assistance about the landlord?

**Comment:** Thank you for that question. And so there are actually two legal assistance organizations in Arkansas and there is Center for Arkansas Legal Services, which services the Little Rock area, and you know, Southern Arkansas generally, and then there's Legal Aid which services mostly north of the state. So Legal Aid has specifically a fair housing office and that's here in Little Rock. And so our fair housing office does some landlord/tenant, which it sounds like that's what you're referring to is, you know, people not being able to pay rent because of the pandemic and that sort of thing. So that's the kind of case that would actually go to Center for Arkansas Legal Services, unless there was a fair housing element. So unless those people were being discriminated on the basis of race, sex, familial status, national origin, you know, or disability.

**Comment:** And then sort of to add to that, I mean, I, I will say that that's one thing that frustrates our purpose sometimes is that, you know, because most of the landlord/tenant work having to do with non-payment, which I mean, we have seen an uptick in our traditional service area of and I know they has as well, is that you know it because our specific office, we need to connect it nexus of discrimination to it in some form. I feel like because there are two offices in Little Rock that handle very similar cases from two different organizations. It's sometimes there's a little bit of, you know, wires getting crossed there. So, but yeah, I mean, if I do think that we've gotten I mean, we have had some calls from Little Rock, we got some billboards up around town now as well, here in the last few weeks. And, you know, generally, if it's something that, you know, we can't necessarily

use in our grant will will certainly refer them out CALS to get that, you know, that landlord/tenant advice or, or landlord/tenant attorney, whatever, you know, whatever they need. But yeah, that is one thing for us is that we need, we need to connect it to discrimination. And sometimes you can see the discrimination, but you can't prove it in court, or you can't, you know, you don't have evidence that that you can back it up with and those are frustrating as well. But anyway, I just I just kind of wanted to add that on the tail end of her comment there.

**Comment:** The reason why I'm asking because this this was happening. I have referred some people and I was like, okay, am I referring them to the wrong place? And mostly it was landlords that didn't want to take the CDC eviction moratorium. And I was referring them to the number 376-3423. And I think I was told that they only took cases, like in the morning and was only certain days, and I don't have it on the paper, but I did keep that number. And I had a few people that the landlords, they want to take the CDC, and then I had to talk to them and explain to them about the CDC moratorium. And and I did refer some people I told them to call Legal Aid. And I didn't realize it was two offices. So I probably need to talk to someone to make sure that when we are referring somebody that we refer them to the right place.

**Comment:** And definitely that yeah, that is the that's the number for the Center for Arkansas Legal Services. So if it's a, if it's a non-payment thing, or something like that, just an eviction, that's yeah, that's where you'd send them. But if it's if it's something to do with, like I said, housing discrimination issue, you can send them our way, I can pull up our special fair housing number here in a second. And the thing is, I mean, at the end of the day, we work really closely with CALS, CALS, works really closely with us. So, you know, for some reason you refer someone to one organization, it needed to be the other generally we will we will be able to refer that person to where they need to be so.

### **Comment:** Okay, okay.

**Comment:** Hi, I am with the Arkansas Housing Commission, if you don't have it already, I want you to have our number too.

**Comment:** Yeah. Have your number and I am familiar with you all. I have. I have referred people. to you all. I've been to your conference, and I knew your other director and everything. But yeah, well. Yeah, I do have that.

**Comment:** Okay. Just want to double check.

### **Comment:** Thank you.

**Comment:** And just so you and the other folks on the call can have it. Our fair housing helpline number is going to be 1-870-338-9834. So for any any discrimination issues, anybody in the state can call that number. And we'll get either one of us on the legal end, or we'll get our investigator, and we can open a case and and go from there.

### **Comment:** Okay, thank you.

**Presenter:** Are there any other comments about what types of barriers we've been seeing or any groups that I've seen a particular issue in accessing housing? I have a few more questions, too. So another part of this is just looking, we kind of touched on this briefly, not necessarily in discrimination, but in the availability of housing choice. And any barriers that any of you all are aware of in the development of affordable housing. that impact the development? Are there any

recommendations of how the city can encourage more affordable housing? My last set of questions, and then any other comments that people would like to make? Um, are there any comments on what the city is doing well to address housing needs? Are there programs or efforts that can be improved by the city? Or any ways that we can engage the public a little bit better in this process?

**Comment:** Again, and I think, for me, I just don't, I'm not aware of all the things that the city is actually doing to address housing needs and so I think it would be helpful to have some sort of list of programs or, you know, summary of efforts that we could refer to. Just for me, you know, I'm, I'm fairly new to this area, and I'm just not very aware of that. So that would be wonderful.

**Presenter:** Thank you, I don't know if you would like to kind of give an overview of what the the city is doing right now, but we can certainly listen.

**Comment:** Okay. Oh, currently, we have provided homeowner rehab. We also provide funding to public services. Currently, they provide Meals on Wheels. We also have the St. Vincent has a clinic at 2500 East Sixth Street and they provide a health service and dental services. And they also have have been doing vaccinations. And also, we do provide a funding to Mainstream, and they do the wheelchair ramps, but right now we COVID they have a stop, but we hope that they can start back so they do a wheelchair ramps. Those are some of the public service. We just did a partnership for rental assistance with Central Arkansas Development Council of CADC. They are processing applications for rental assistance with CDBG COVID. Also we have a partnership with St. Francis House, they will also be doing a rental assistance, Family Promise Pulaski County, they will be doing run to assistance, also some COVID testing and other some other homeless services. And we have partner with Little Rock Community. I mean Little Rock Compassion Center, and they are homeless shelter and we have gained them funding's, funding for their program. So this is just out of. that's just out of Community Development Housing and Neighborhood Program. That's just some of the programs that we do and that's from CDBG, which Community Development Block Grant funds and Home Investment Partnership funds. We also partner with Arkansas Regional Commission, which is out of Faulkner County and also Pulaski County. They assist us with our HOPWA which is Housing Opportunity for Persons with AIDS and we provide rental assistance and short term rental assistance, and mortgage and utility assistance. So that's basically the three HUD programs that we have and then, overall, the city also have a Community Program Division, and they help with youth and after school programs, I think they get ready to start up their youth program, which they help over 500 kids with jobs in the summer. And they also have a reentry program, and they help people that have been in prison with finding jobs and getting back out into the community. And that's just stuff I can think of off the top of my head. Is that the kind of information you're looking for?

**Comment:** Yes, that's great. Thank you.

**Comment:** Okay, I can sing you some emails too?

**Comment:** I'd love to get your email at some point. But um, could you tell me you, I think you first thing you mentioned was homeowner rehab. Can you tell me a little bit about that? What does that entail?

**Comment:** Homeowner rehab, currently, right now because of COVID, we are only doing emergency assistance. And that's for things that like we do roof and have things that we can do outside roof. And plumbing is for the elderly, or disabled. And we go in and like I said, fix their roof and we also have another program where we go in, we do inside and with the HOME funding,

we bring houses up to code and and we also partner with some nonprofits and one we do a new construction. One of the nonprofits that we have a partner with is University Development District Corporation, they have built houses for low income families for sale. Also better Community Development have also, and they also have deal houses and affordable and affordable.

**Comment:** Okay, thank you for that.

**Comment:** Okay. You're welcome.

**Comment:** You had mentioned a wheelchair ramp aid program. I know I've had people ask me about that in the past, you would be the contact for that?

**Comment:** Their manager is a Rita Buyers by find her contact, contact information real quick.

**Comment:** Wonderful.

Presenter: I'll also put her email up on the screen right now. Thank you want to drop that.

**Comment:** Along with better access to information, it is impossible to find grants or programs available.

**Comment:** Okay, that's the number is 281-0012.

**Comment:** Thank you very much.

**Comment:** You're welcome.

**Presenter:** Are there any other comments about you know, fair housing or how the city can better advocate for housing options in the community?

**Comment:** So this is sort of a personal concern about housing, but I have friends who live downtown. I live in Hillcrest, and I think Hillcrest is sort of has some of these similar restrictions, but I think downtown is worse when you live in the Historic District. But there are so many limitations on like the types of materials that you can use, and having to get variances to make changes to your house. And I think, you know, those things tend to make any kind of revitalization of those neighborhoods, just too expensive for people who actually live there. And I really, of course, I'm talking about something I don't know, a lot of from personal experience, because I haven't had to get a variance for my house or anything like that. But you know, I know those processes, they're not super complicated, but they're also not super easy and straightforward. And they require you to go down, you know, during the day when people have to work, and explain the need to make a change to your property. Which I think really does cause a barrier for people to try to revitalize neighborhoods. And I do think that certain things like that, especially in historic districts, when the materials they want you to use are much more expensive than other materials, I think it really invites gentrification instead of revitalization. And I think that is an issue that, you know, I don't know how much the city can really do to address that. But I think that is an issue for people wanting to own houses, specifically in the downtown historic districts.

**Presenter:** Thank you. Yeah, we've heard similar comments to that in some of our other public input meetings.

**Comment:** And I'm from Southwest Little Rock. And some of the concerns that I have is live with a fair housing and as with the revitalization, I'm not seeing much going on in my area. So one of the

things I want to know is, how do you determine who's going to get assistance in it's like, getting the house repair priceless, in other ways. So I would like some of that information, so I could share it, because I wasn't aware of a lot of it. But Oh, those are some of the barriers that we have in our area. So we just wanted to know, how do you determine the qualification? Is it an age or income? What?

Presenter: would you like that for her?

**Comment:** Yes. As you know what any federal program is always income restrictions. And we have to go by income restrictions. Most our program is you have to be elderly, 62 or disable, and we take applications so it's like a first come first serve.

**Presenter:** Thank you. Are there any other comments or questions or concerns that you'd like to share?

**Comment: Comment:** Does the city do any education for people like new homebuyers, people who are looking to buy homes for the first time?

**Comment:** Okay, we require we have a Down payment Assistance Program. And what are the things you have to go through homebuyer counseling? And that's one of the requirements and most loans that you get, they ask you for some kind of counseling, but we do not do direct counseling. But we do require you have to have eight hours of homebuyer counseling. And right now, we are assisting with down payment assistance, but the house has to be a new construction or vacant because the COVID because we have to go in and do our inspection. And it has to pass HQS, Housing Quality Standards, and we do have funding available. And if you know anybody, and they do, it is income restricted and it's on our website, which is www.littlerock.gov. And you can just go to City Hall and go to community, housing and neighborhood programs in community development. And you will find it, or you can go Google it and just say, down payment assistance.

**Presenter:** Are there any other questions or comments?

### Presentation

What we have coming up next, this analysis of impediments is following the same timeline as the city's Consolidated Plan. We're continuing to collect data; we have two more public input meetings for the Consolidated Plan. And then we'll be preparing a draft for public review, that will go out for a 30 day public review period. During that time, we'll have another set of public input meetings, where we collect any comments on those draft documents filed, and once it's been adopted, will be submitted to HUD. I'd like to thank all of you for coming and participating. I'm going to leave that release email up here again, if anyone has comments later, but I'll stay on for a couple of minutes if there are any additional comments or questions that hopefully we can address for you. But thank you all for taking the time out of your day to be here with us.

**Comment:** But you said that you direct people to counseling for the Downpayment Assistance Program? Is there a specific organization that does that counseling?

**Comment:** It was it was several different organizations. And I guess what since COVID, I think some people are doing it online. But in affordable housing, you still do counseling, basically, if if it's an organization that Arkansas Development Finance Authority, use for as counseling, we will allow that.

**Comment:** Just so you know, the reason I'm asking is that, you know, Legal Aid, has a homebuyer training, essentially training people who are, you know, wanting to buy homes, on their fair housing rights. And we've kind of struggled with getting a group together to actually make those presentations. And so I'm trying to figure out, you know, where we could find people, you know, that would be helpful for, and maybe if there are organizations in the community, we could work with to get connected with those people that are looking to buy houses.

**Comment:** Okay, we probably need to email me because I know, I don't know, once COVID is over, which is probably I know, some people that do have they was doing in person and affordable housing was doing a homebuyer counseling at the Neighborhood Resource Center and they had different people coming in and doing different sections. And that I know, that was one organization. I know that they was doing it that way with some of probably some other organizations. And I just can't think of offhand.

**Comment:** Okay, I'll just email you about that. Thank you.

**Comment:** Okay. Thank you.

**Presenter:** Thank you for coming.