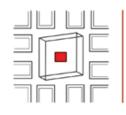
ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE KNOXVILLE, TN









Nashville, TN | Pikeville, TN | Huntsville, AL



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[CONTENTS]

INTRODUCTION	05
METHODOLOGY	09
JURISDICTIONAL BACKGROUND DATA Population: Age, Gender, Family Type Race National Origin Limited English Proficiency Language Disability Employment Income Housing Profile Home Mortgage Disclosure Act Data	13
FAIR HOUSING STATUS	45
PUBLIC SECTOR ANALYSIS	51
PRIVATE SECTOR ANALYSIS	63
CONCLUSIONS AND RECOMMENDATIONS	67
APPENDIX	75

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[A] INTRODUCTION

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE KNOXVILLE, TN

A) INTRODUCTION

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

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

and City's five-year Consolidated Plan 2020-2024 and builds upon previous analyses that were completed in 2005, 2010, and 2015.

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

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

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

INTRODUCTION

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

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

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

Furthermore, the impediments to fair housing choice

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

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

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

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

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B METHODOLOGY

METHODOLOGY

B) METHODOLOGY

The methodology employed to undertake this AI study includes:

RESEARCH:

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

INTERVIEWS AND MEETINGS:

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

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

Public Meeting

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

> **Public Meeting** January 21st, 2020 5:00 PM 611 Winona St, Knoxville, TN

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

Focus Group

In addition to the public meeting, a focus group was held on February 11th, 2020 at noon at 546 College Street, Knoxville, TN. Knoxville Branch of National Association for the Advancement of Colored People (KNAACP) ensures the political, educational, social, educational and economic equality of rights of all persons and eliminates race-based discrimination. KNAACP organized the group and participants included members of KNAACP, city and county staff. A flyer explaining the Analysis of Impediments to Fair Housing Choice and related fair housing laws was circulated through the KNAACP email list serve. The discussion included fair and affordable housing needs, neighborhood conditions, and community resources in Knoxville and Knox County.

Stakeholder Meetings

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

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

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

Web based Surveys

Another method of obtaining community input was a thirty three question web-based survey conducted for City of Knoxville and Knox County. The survey was available in English at

https://www.surveymonkey.com/r/StakeholderSurveyforAl,

The Spanish version was available at

https://www.surveymonkey.com/r/X8R89CH

Hard copies were available at local government offices and public libraries during the months of February and March.

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

Public Comment Period

The City of Knoxville and Knox County will hold a 30-day public comment period and public hearings to receive input on the draft Analysis of Impediments in April and May 2020. No comments on the

METHODOLOGY

Al were received during the 30-day public comment period in June 2020.

Publicity of Community Engagement Activities

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

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

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

ANALYSIS OF DATA:

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

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

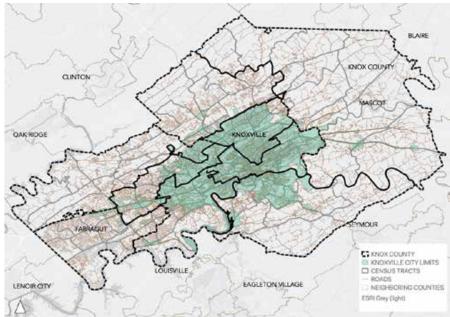
The City of Knoxville is the county seat of Knox County. Knoxville is one of the gateways to the Great Smoky Mountains National Park, and the headquarters of several regional and national corporate companies are located within the city. Knoxville is also home to the main campus of the University of Tennessee.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

The city and county have a separate mayor and city council, however residents of the county living within the City of Knoxville can vote in both city and county elections. The City and County both run services efficiently with county overlooking the local school system, health department and library branches while the City of Knoxville maintains the police department (Knox County's website).

1) Population: Age, Gender, Family Type

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

Map A: CDBG Target Area Boundaries



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

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

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

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

Table 1.2 Population Change in City and County

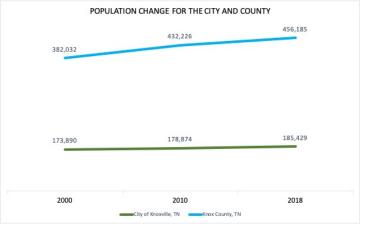
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Area	Population Change (2	2010 to 2018)	% Change	
City of Knoxville, TN	6,555			4%
Knox County, TN	23,959			5%

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

AGE

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

Graph 1.1 Population Change in City and County



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

GENDER

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

FAMILY TYPE

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

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

Table 1.3 Population Characteristics

	(Knoxville, TN CDBG, HOME) Jurisc	iction	(Knox County, TN CDBG, HOME) Jurisd	liction	(Knoxville, TN) Region	
Sex	#	%	#	%	#	%
Male	86,14	7 48.16%	114,079	48.92%	409,186	48.85%
Female	92,72	7 51.84%	119,110	51.08%	428,385	51.15%
Age	#	%	#	%	#	%
Under 18	34,76	19.43%	54,615	23.42%	182,666	21.81%
18-64	121,94	4 68.17%	147,363	63.19%	528,808	63.14%
65+	22,17	12.39%	31,211	13.38%	126,097	15.06%
Family Type	#	%	#	%	#	%
Families with children	16,78	42.37%	27,690	42.48%	89,742	39.85%

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

Table 1.4 Population Trends

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

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

Table 1.5 Age by Cohorts

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

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

2) Race

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

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

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

Table 2.1 Race/Ethnicity Trends for Jurisdictions and Region

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

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

Segregation/Integration Analysis

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

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

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

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

Table 2.2 Race/Ethnicity Trends for Jurisdictions and Region

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

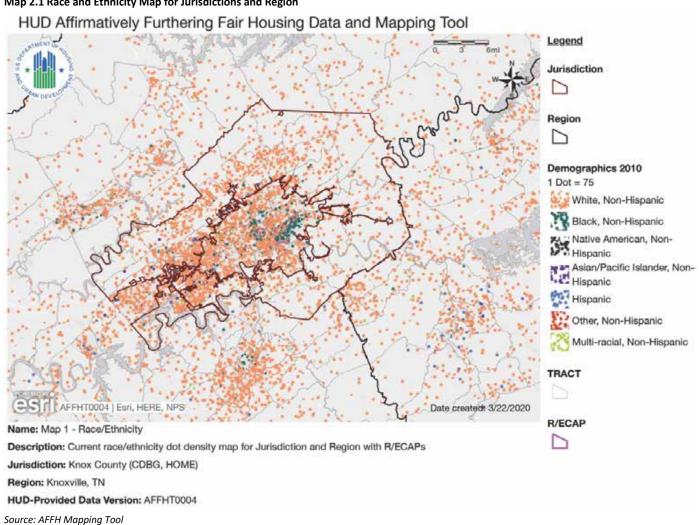
Source: AFFH-T Table 2, Version AFFHT0004

Table 2.3 Race/Ethnicity Dissimilarity Trends for Jurisdictions and Region

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

Source: AFFH-T Table 3, Version AFFHT0004

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



Map 2.1 Race and Ethnicity Map for Jurisdictions and Region

3) National Origin

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

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

Table 3.1 National Origin

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

Source: AFFH-T Table 1, Version AFFHT0004

Table 3.2 National Origin Trends

		(Kr	noxville, TN	CDBG, H	OME) Juri	sdiction				(Kn	ox County	, TN CDB	3, HOME)	Jurisdictio	on				(K	noxville, T	N) Regio	n		
	1990 T	1990 Trend 2000 Trend 2010 Trend Curre					ent	1990 Trend 2000 Trend 2010 Trend Current 1990 Trend 2000 Trend 2010 Trend							Curre	ent								
National Origin	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Foreign-born	3,270	0.02%	5,150	0.03%	7,583	0.04%	9,032	0.05%	2,345	0.02%	3,879	0.02%	8,378	0.04%	10,086	0.04%	8,487	0.01%	14,580	0.02%	27,007	0.03%	30,679	0.04%

Source: AFFH-T Table 1, Version AFFHT0004

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool Legend Jurisdiction Region National Origin [Region] (Top 5 most populous) 1 Dot = 75 People Mexico Ma India Canada China excl. Hong Kong & Talwan Vietnam TRACT R/ECAP AFFHT0004 | Esri, HERE, NPS Date created: 3/22/2020 Name: Map 3 - National Origin Description: Current national origin (5 most populous) dot density map for Jurisdiction and Region with R/ECAPs Jurisdiction: Knox County (CDBG, HOME) Region: Knoxville, TN **HUD-Provided Data Version: AFFHT0004**

Map 3.1. National Origin Dot Density Map

Source: AFFH Data and Mapping Tool

4) Limited English Proficiency (LEP) Language

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

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

Table 4.1 Limited English Proficiency Language

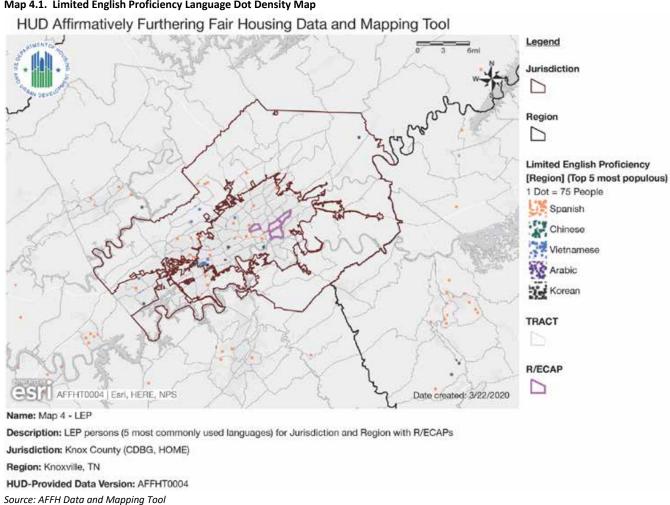
	(Knoxville, TN CDBG, HOM	E) Jurisdic	tion	(Knox County, TN CDBG, HO	ME) Jurisd	iction	(Knoxville, TN) Re	gion	
Limited English Proficiency		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		, , , , , , , , , , , , , , , , , , , ,	,		,	J -	
(LEP) Language		#	%		#	%		#	%
#1 LEP Language	Spanish	3,036	1.79%	Spanish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

Source: AFFH-T Table 1, Version AFFHT0004

Table 4.2 Limited English Proficiency Language Trend

	(Knoxville, TN CDBG, HO ME) Jurisdiction					(Knox County, TN CDBG, HOME) Jurisdiction					(Knoxville, TN) Region													
	1990	Trend	2000 T	rend	2010 7	rend	Curr	ent	1990	Trend	2000	Γrend	2010 7	Γrend	Curre	ent	1990 T	rend	2000 1	Frend	2010	Frend	Curre	ent
LEP	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Limited English																								
Proficiency	2,165	1.29%	2,931	1.71%	4,701	2.63%	5,792	3.24%	1,138	0.73%	1,968	1.02%	4,099	1.76%	4,557	1.95%	5,343	0.82%	8,869	1.19%	15,280	1.82%	16,356	1.95%

Source: AFFH-T Table 1. Version AFFHT0004



Map 4.1. Limited English Proficiency Language Dot Density Map

5) Disability Type

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

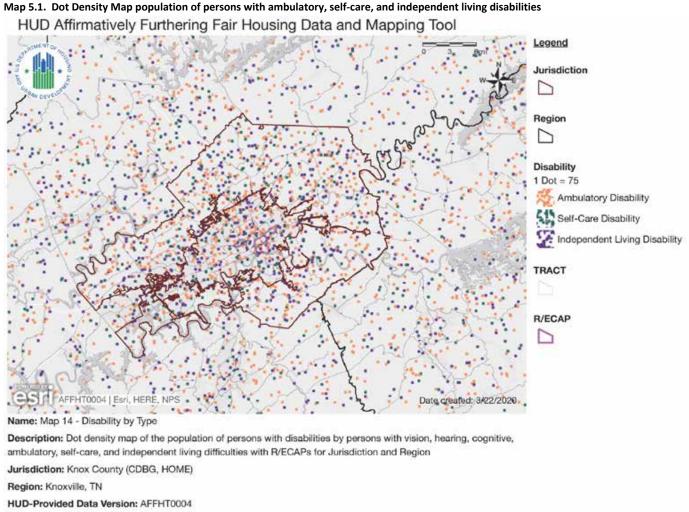
21.00. Self-care issues are most prevalent with people residing in CT 49.00, CT 68.00, and CT 57.12. The people who need assistance and can't live independently are high in CT 68.00, CT 49.00, and CT 59.08. Map 5.1 shows the density of people with disabilities in the city and county.

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

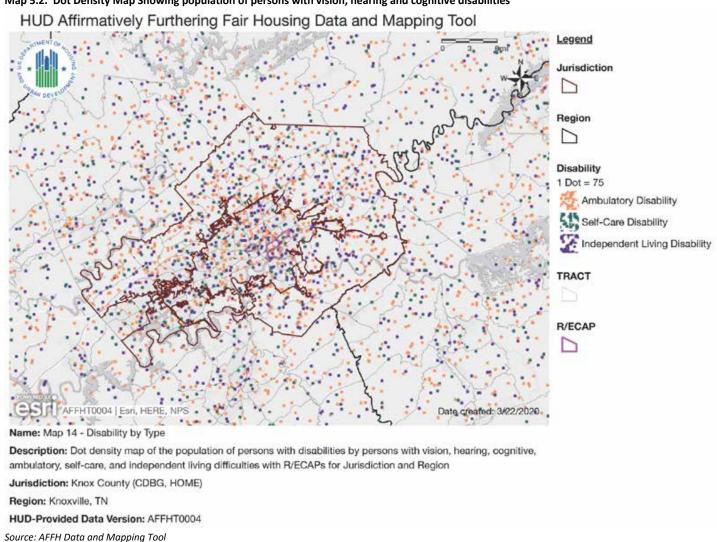
Table 5.1 Disability Type

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

Source: AFFH-T Table 2, Version AFFHT0004



Source: AFFH Data and Mapping Tool



Map 5.2. Dot Density Map Showing population of persons with vision, hearing and cognitive disabilities

Jurisdictional Background Data

6) Employment

According to the recent ACS (2011-2015) and HUD populated data, over 90% of the population 16 years and over is in the labor force. The rate of unemployment in the ages of 16-24 is 15.74% while rate of unemployment in ages 25-64 years is only 3.95%. The US Department of Labor's Economic Summary for Knoxville Region published March 05, 2020 reports a 3.4% national unemployment rate for the month of December 2019. Further, it finds that the unemployment rate for Knox County is only 2.5% and that of Knoxville is 3.1%.

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

as shown in Table 6.2. Further, top employers reported by the East Tennessee Economic Development Agency's list of largest employers, updated in 2020, are shown in Table 6.3. The Economic Development Agency elucidates the above findings as 9,384 employees work for The University of Tennessee that reside in Knoxville. With 8,082 residents working in the public education system, Knox County Schools employs about 8,082 workers. Additionally, Covenant Health, Wal-mart Stores, Inc. and Clayton Homes are also big regional employers that employ Knox County residents.

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

Total Population in the Civilian Labor Force	64.6%
Civilian Employed Population 16 years and over	61.1%
Unemployment Rate	3.1%

Source: ACS 2018, 5 year estimates

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

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

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

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

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

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

Table 6.3 Top Employers

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

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

Table 6.4 indicates that only 1.63% of the population over 16 years that go to work choose public transportation as an option, 3.59% walk, only 0.70% bike and 9.45% carpool in a car, van or truck. While 79.90% drive alone in a car, truck, or van as a means to commute to work. The mean travel time was reported to be 18.9 minutes as reported in ACS 2013-2017 which is about 6 minutes less than the national average. Additionally, 15.30 % of the people worked outside their county of residence and 1.0% also worked outside the state of residence (Table 6.5). The County and City have proposed energy efficient zoning codes and the average car ownership of two cars per household seem to be going against the sustainability goals. For a city that wants to reduce carbon footprint and bring about energy efficiency. A robust and integrated transportation system should be invested in. Additionally, there seems to be a disconnect between affordable housing locations and transit service areas which implies that better integration is needed.

Table 6.4 Means of Transportation, Knoxville

Subject	Percentage
Car, truck, or van - drove alone	79.9%
Car, truck, or van - car pooled	9.45%
Public transportation	1.63%
Walked	3.59%
Bicycle	0.7%
Taxicab, motorcycle, or other means	0.07%
Worked at home	3.86%

Source: ACS 2013-2017

Table 6.5 Place of Work,

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

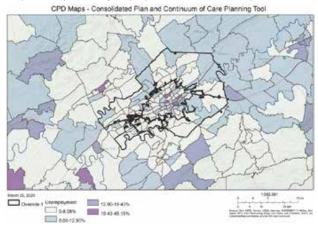
Source: ACS 2013-2017

Table 6.6 Travel Time. Knoxville

Travel Time	Percentage
< 30 Minutes	67.80%
30-59 Minutes	27.1%
60 or More Minutes	5.1%
Total	100%

Source: ACS 2018, 5 Year Estimates

Map 6.1 Map showing employment for Knox County and Knoxville,



Source: Continuum of Care Planning Tool

Unemployment: Knox County's unemployment rate is 2.5% while that of Knoxville is 3.1% as reported by the Bureau of Labor Statistics. The census tracts that have higher concentration of unemployed people are CT 19.00, CT 68.00, CT 14.00, and CT 29.00. These areas also suffer from high cost burden as well as a high poverty rate. The median household income in CT 14.00 and CT 68.00 remain low as well.

7) Income

Households in Knoxville have a median household income of \$37,703, which is \$19,949 less than the national median household income. While there are 16.7% of total households with income in the range of \$50,000 to \$74,999, there are also 22% of total households whose income in less than \$15,000. These values are in stark contrast with the values of Knox County. Households in Knox County have a median household income of \$52,458, which is \$5,194 less than the national median household income. While there are 17.40% of total households with income in the range of \$50,000 to \$74,999, there are also 13% of total households whose income in less than \$15,000. There are income disparities between the two jurisdictional areas thereby suggesting that policies regarding housing and employment need a joint effort for revitalization. Concentration of poverty and lower income households begins to suggest that there are deeper issues that need to be looked into cohesively by the jurisdictions.

In 2017, the tract with the highest median household income were CT 57.10. 58.10 and 58.12. ACS, 5-year estimates suggest that 15.8% and 26.2% of the populations for whom the poverty status is determined live below the poverty line in Knox County and Knoxville respectively. The largest demographic group living in poverty are females in both the jurisdictions.

The most common racial or ethnic group living below the poverty line in Knox County is White, followed by African American, and then Hispanics with 49,887, 13,806, and 5,110 people respectively. While in Knoxville the most common racial or ethnic group living below the poverty line is African

American, followed by Native Hawaiian or Pacific Islander, and then Hispanics with 13,030, 50, and 3,156 people respectively.

Poverty rate is high in census tracts within in Knoxville city limits, with Census tracts 19.00, 68.00, 09.02, 14.00, 09.02, 69.00, 26.00 having a poverty rate of more than 50% (see map 7.1). Of these CT 69.00 and CT 14.00 are especially concerning with poverty rates of 70.31% and 67.87%, respectively. CT 14.00 has a housing cost burden of 50.43%, an unemployment rate of 22.97%, and the median household income in this census tract is \$10,164. Further, CT 69.00 has a housing cost burden of 64.45%, an unemployment rate of 4.89%, and the median household income in this census tract is \$11,754. These conditions with the prevalent poverty rate indicate that these areas need immediate attention and allocation of resources.

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

Knoxville

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

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

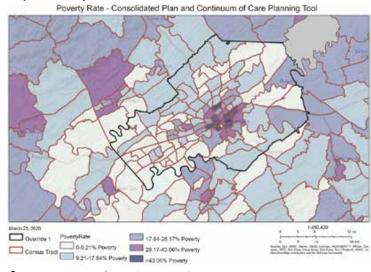
Source: Housing and Urban Development FY 2018, Income Limits Documentation System

Table 7.2 Income and Benefits

Income and benefits (in 2017 inflation adjusted dollars	Number	Percentage
Total households	79,579	
less than \$10,000	9390	11.8%
\$10,000 to \$14,999	5968	7.5%
\$15,000 to \$24,999	11539	14.5%
\$25,000 to \$34,999	10664	13.4%
\$35,000 to \$44,999	11539	14.5%
\$50,000 to \$74,999	13290	16.7%
\$75,000 to \$99,999	7242	9.1%
\$100,000 to \$149,999	5650	7.1%
\$150,000 to \$199,999	2149	2.7%
\$200,000 or more	2149	2.7%

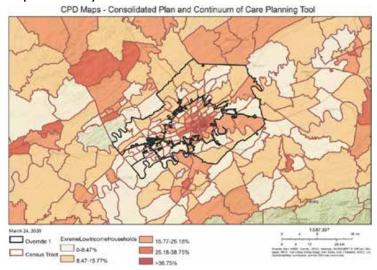
Source: ACS 2018, 5 year estimates

Map 7.1 Poverty Rate



Source: Continuum of Care Planning Tool

Map7.2 Extremely Low-Income Households



Source: Continuum of Care Planning Tool

0.33

8) Housing Profile

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

Table 8.1 Housing Characteristics

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

Source: ACS 2013-2017

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

Table 8.2 Housing units in structures

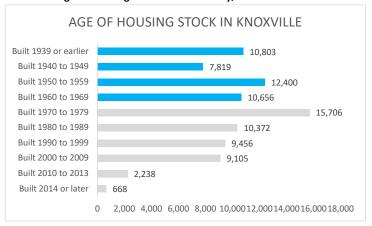
UNITS IN STRUCTURE	KNOXVILLE	KNOX COUNTY					
Total housing units	89,223	200,608					
1-unit, detached	47,725	132,410					
1-unit, attached	4,675	11,815					
2 units	2,510	3,545					
3 or 4 units	4,395	6,457					
5 to 9 units	7,540	10,318					
10 to 19 units	10,012	12,949					

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

Source: ACS 2013-2017

Of the housing stock within Knoxville, the highest percentage of housing units were built between 1970-1979 at 17.60% followed by 1950-1959 at 13.8%. Chart 8.1 shows that 64.31% of the housing units in the city are over 50 years and older. With such an old housing stock, rehabilitation efforts may be required for the safety and security of the residents. With over 35% of households at or below HUD's low-income standards, additional efforts may need to be considered at governmental level for renovating this stock for it to meet the sustainability standards adopted by the zoning code.

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



Source: ACS 2013-2017

HUD's housing data shows the number and percentages of owner-occupied and renter-occupied units by the year housing units were built as seen in Table 8.3. In the past thirty years, there has been a larger rise in the buildings

that accommodate renter-occupied units than owner-occupied units. Overall, the highest number of units were built between 1950-1979, implying that many of the units could be in need of repairs. They could be below current housing standards, and material and safety compliance could be an issue in these older structures, especially in low-income areas.

Table 8.3 Owner and Rental Details for Housing units

Year Unit Built	Owner Occupied		Renter Occupied	
	Number	Percentage	Number	Percentage
2000 or later	4,059	11%	4,605	11%
1980-1999	8,392	22%	10,235	24%
1950-1979	17,272	46%	22,720	52%
Before 1950	8,065	21%	5,725	13%
Total	37,788	100%	21,037	100%

Source: 2011-2015 CHAS

Almost 46% of the housing stock in Knox County is owner occupied, and nearly 54% is renter occupied. Table 8.4 below shows that the highest percentage of housing value of owner-occupied housing lies in the \$100,000 to \$149,999 category with almost 7.9% housing units in this category. The median housing value for owner occupied housing units is \$128,800 which is \$42,000 less than the state's median housing value. Furthermore, looking at the rate of poverty and median household income, the housing values still seem high, and it seems that only a small percentage of the population could

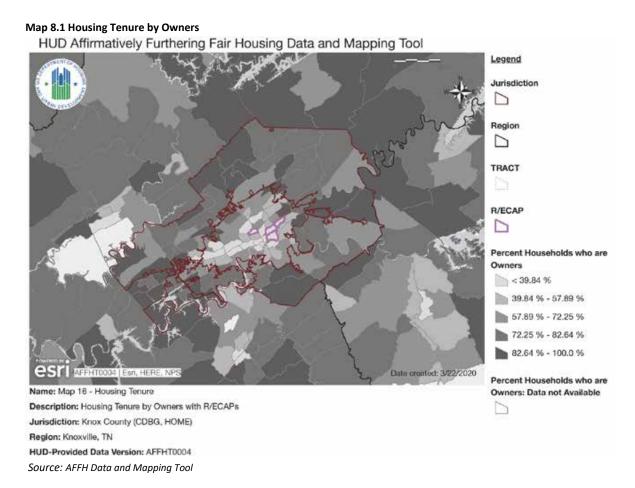
afford to own a house. Additional assistance may be required for residents from low to moderate income households to purchase a home.

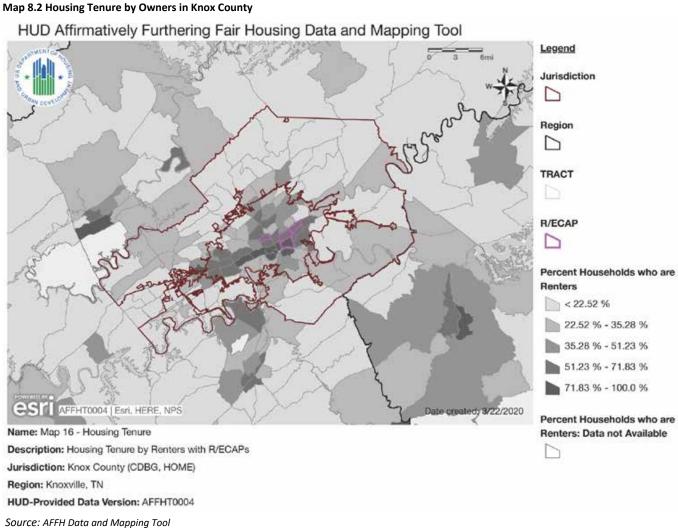
Within the county, the northern, north eastern, southern and south-western parts have high home ownership rates. Within Knoxville city limits, the home ownership rates drop to 45%. Only a few areas in the city, CT 31.00, CT 33.00, CT 46.08 and CT 55.02, show high ownership. In downtown Knoxville, where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

Table 8.4 Housing Values

Housing Value for Owner Occupied Units	Estimate
Less than \$50,000	2,205
\$50,000 to \$99,999	9,986
\$100,000 to \$149,000	10,201
\$150,000 to \$199,999	6,280
\$200,000 to \$299,999	3,793
\$300,000 to \$499,999	2,454
\$500,000 to \$999,999	1,158
\$1,000,000 or more	302
Median Housing Value (dollars)	128,800

Source: ACS 2013-2017





Knoxville

Jurisdictional Background Data

Renter occupied housing units make up almost 54% of the total occupied housing units in the city. The median rent is nearly \$791 per month, as shown in Table 8.5. Median rent in the City is less than the County by \$48. Nearly 54% of the renter occupied units paid between \$500-\$999 per month, while 22% of households paid more than \$999, and 17% paid less than \$500 per month. The National Low-Income Housing Coalition (NLIHC) Report for 2019 suggests that an hourly wage of \$16.44 is necessary to be able to afford a two-bedroom apartment at Fair Market Rent in Fiscal Year 2019 in Knox County. Fair Market Rent for a Two bedroom in Knox County is \$855, and in order to afford the rent and utilities, without paying more than 30% of income on housing, the number of full-time jobs at minimum wages that will needed to afford this rent will be 2.3.

Table 8.5 Gross Rent Value Table

Gross Rent (Occupied Units Paying Rent)	Estimate Number
Less than \$500	7,212
\$500 to \$999	23,478
\$1,000 to \$1,499	8,004
\$1,500 to \$1,999	1,492
\$2,000 to \$2,499	349
\$2,500 to \$2,999	102
\$3,000 or more	202
Median dollars	791
No rent paid	2,603

Source: ACS 2013-2017

When evaluating mortgages and rents in the area, it is important to evaluate the housing costs with overall gross annual income. HUD suggests that households paying more than 30% of their income on housing costs (mortgage/rent payments and utilities) are cost burdened. Households whose monthly housing costs exceed 50% of their monthly income are

defined as households under severe cost burden. According to ACS 2013-2017 (Table 8.6), almost 48% of the renters are paying more than 30% of their income towards rent. The AFFH tool also provides data to supplement the understanding of cost burden for all racial/ethnic groups, age groups, and disability as shown in Tables 8.7 and 8.8.

Table 8.5 Gross Rent as a percentage of household income

Gross rent as a percentage of household income	Estimate Number
Less than 15 percent	4,125
15.0 to 19.9 percent	3,868
20.0 to 24.9 percent	5,304
25.0 to 29.9 percent	5,423
30.0 to 34.9 percent	3,910
35.0 percent or more	16,798
Not computed	39,428

Source: ACS 2013-2017

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

cold piped water, a flush toilet, and a bathtub or shower; and Households with kitchen facilities that lack a sink with piped water, a range or stove, or a refrigerator.

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

White and Black populations experience housing burdens. However, R/ECAPS are generally in distress, so it seems that the Black population experiences housing burdens at a slightly higher level.

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

Table 8.7 Demographics of Households with Severe Housing Cost Burden

Table 10 - Demographics of Households with Severe Housing Cost Burd	en					
Households with Severe Housing Cost Burden	(Knox Count	y, TN CDBG, HO	OME) Jurisdiction	(K	gion	
Race/Ethnicity	# with severe	#households	% with severe cost	# with severe	#households	% with severe
	cost burden		burden	cost burden		cost burden
White, Non-Hispanic	9,950	64,758	0.15%	34,535	305,757	11.29%
Black, Non-Hispanic	3,655	13,822	26.44%	4,653	20,597	22.599
Hispanic	720	2,192	32.85%	1,324	7,233	18.30%
Asian or Pacific Islander, Non-Hispanic	158	1,179	13.40%	560	3,695	15.169
Native American, Non-Hispanic	15	119	12.61%	103	668	15.429
Other, Non-Hispanic	300	1,212	24.75%	769	3,884	19.809
Total	14,798	83,300	17.76%	41,944	341,855	12.279
Household Type and Size						
Family households, <5 people	4,430	35,397	12.52%	18,108	198,112	9.149
Family households, 5+ people	640	3,329	19.22%	2,370	22,163	10.699
Non-family households	9,754	44,580	21.88%	21,400	121,574	17.60%
Note 1: Severe housing cost burden is defined as greater than 50% of income.						
Note 2: All $\%$ represent a share of the total population within the jurisdiction o	r region, except	household type	and size, which is o	ut of total house	holds.	
Note 3: The # households is the denominator for the $\%$ with problems, and may	differ from the	# households fo	r the table on severe	housing probler	ns.	
Note 4: Data Sources: CHAS						
Note 5: Refer to the Data Documentation for details (www.hudexchange.info/resource/48	48/affh-data-doc	umentation).				

Source: AFFH Data and Mapping Tool

Table 8.8 Demographics of Households with Disproportionate Housing Needs

Table 9 - Demographics of Households with Disproportionate Housing Needs												
Disproportionate Housing Needs	(Knoxville,	TN CDBG, HOME) Jurisdiction	(Knoxville, TN) Region								
Households experiencing any of 4 housing problems	# with problems	# households	% with problems	# with problems	# households	% with problems						
Race/Ethnicity												
White, Non-Hispanic	22,028	64,758	34.02%	81,378	305,757	26.62%						
Black, Non-Hispanic	6,454	13,822	46.69%	8,654	20,597	42.02%						
Hispanic	1,344	2,192	61.31%	3,410	7,233	47.15%						
Asian or Pacific Islander, Non-Hispanic	447	1,179	37.91%	1,293	3,695	34.99%						
Native American, Non-Hispanic	55	119	46.22%	231	668	34.58%						
Other, Non-Hispanic	572	1,212	47.19%	1,574	3,884	40.53%						
Total	30,904	83,300	37.10%	96,535	341,855	28.24%						
Household Type and Size												
Family households, <5 people	9,879	35,397	27.91%	43,625	198,112	22.02%						
Family households, 5+ people	1,575	3,329	47.31%	7,849	22,163	35.41%						
Non-family households	19,450	44,580	43.63%	45,065	121,574	37.07%						
Households experiencing any of 4 Severe Housing	# with severe		% with severe	# with severe		% with severe						
Problems	problems	# households	problems	problems	# households	problems						
Race/Ethnicity												
White, Non-Hispanic	10,777	64,758	16.64%	38,827	305,757	12.70%						
Black, Non-Hispanic	3,787	13,822	27.40%	4,900	20,597	23.79%						
Hispanic	790	2,192	36.04%	1,894	7,233	26.19%						
Asian or Pacific Islander, Non-Hispanic	283	1,179	24.00%	759	3,695	20.54%						
Native American, Non-Hispanic	40	119	33.61%	138	668	20.66%						
Other, Non-Hispanic	368	1,212	30.36%	922	3,884	23.74%						
Total	16,050	83,300	19.27%	47,440	341,855	13.88%						

Note 1: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%.

Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.

Note 3: Data Sources: CHAS

Note 4: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).

Source: AFFH Data and Mapping Tool

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool Legend Jurisdiction Region Demographics 2010 1 Dot = 75 White, Non-Hispania Black, Non-Hispanic Native American, Non-Hispanic Asian/Pacific Islander, Non-Hispanic Hispanic Other, Non-Hispanic Multi-racial, Non-Hispanic TRACT CS AFFHT0004 Esri, HERE, NPS ted: 3/24/2020 R/ECAP Name: Map 6 - Housing Problems Description: Households experiencing one or more housing burdens in Jurisdiction and Region with R/ECAPs and race/ethnicity dot density Percent Households with Burden Jurisdiction: Knox County (CDBG, HOME) < 21.78 % Region: Knoxville, TN 21.78 % - 27.93 % **HUD-Provided Data Version: AFFHT0004** 27.93 % - 35.08 % 35.08 % - 48.08 % 46.08 % - 100.0 % Percent Households with Burden: Data not Available

Map 8.3 Housing Problems

Source: AFFH Data and Mapping Tool

9) Home Mortgage Disclosure Act (HMDA) Data

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

According to THDA's annual report, price appreciation in Tennessee is outpacing the nation. Since the second quarter of 2016, Tennessee home price appreciation has always exceeded the nationwide pace. In the second quarter of 2019, Tennessee's annual price appreciation of 7.18% was more than two percentage points higher than the U.S. price increase of 4.99%. This further adds stress on the lower income households of both owners and renters to maintain their housing status. For Knoxville, the home price appreciation in 2014 was 11.30% which was three times more than the home price appreciation percentage of year 2013.

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

The Knoxville Housing Market Area (HMA), coterminous with the Knoxville, TN Metropolitan Statistical Area, is home to the University of Tennessee (UT)

and the U.S. Department of Energy (DOE) Oak Ridge National Laboratory and borders the Great Smoky Mountains National Park. The HMA includes Anderson, Blount, Campbell, Grainger, Knox, Loudon, Morgan, Roane, and Union Counties. According to HUD's data, following the local economic downturn in 2009, economic conditions in the Knoxville HMA have been relatively strong. Nonfarm payrolls are expected to grow an average of 0.6 percent a year. The sales housing market in the HMA is currently balanced, with an estimated 2.4-percent vacancy rate, down from 2.8 percent in April 2010. Between August 2017 and August 2018, total home sales—including new and existing single-family homes, condominiums, and townhomes rose to 22,200, a 4-percent increase from a year earlier but slowing from a 7percent increase during the 12 months ending August 2017 (CoreLogic, Inc.). The average home sales price during the past 12 months rose 5 percent to \$187,600, up from a 4-percent increase during the previous 12 months. Demand is estimated for 9,400 new homes. The 910 homes currently under construction will meet a portion of the forecast demand. The rental housing market in the HMA is currently balanced. The current rental vacancy rate is estimated at 7.5 percent, down from 10.5 percent during 2010. The apartment market is also currently balanced, with a 3.7-percent vacancy rate during the third quarter of 2018, down from 3.8 percent a year earlier (Reis, Inc.). Demand is expected for 2,525 new market-rate rental units. The 1,825 units currently under construction are expected to satisfy most of the demand.

Multifamily production accelerated from 2014 through 2017. Improved economic conditions and strong demand for new apartment units, fueled by increasing net in-migration, resulted in increased levels of multifamily construction in the HMA. Because of the aging population, 10 percent of the units permitted were facilities for senior citizens. Five assisted-living facilities and four senior apartment developments were added in Knox County. Most of the multifamily construction in the past 5 years has been concentrated in the northwest part of Knox County. Tapestry at Turkey Creek, in western Knox County, was completed and is currently in lease up. This 220-unit

development is near the Turkey Creek commercial center and offers one-bedroom units from \$1,085 to \$1,345, two-bedroom units from \$1,270 to \$1,525, and three-bedroom units from \$1,495 to \$1,695. Construction is under way at the Waterstone Apartments in Hardin Valley. The 252-unit development is expected to be complete by early 2019 and offers one-bedroom units from \$982 to \$1,084, two-bedroom units from \$1,219 to \$1,319- and three-bedroom units for \$1,539.

Home prices have continued to rise throughout the country, though for most markets, at a slower pace. However, in Knoxville HMA home prices have risen significantly since 2013, homes have become less affordable, and therefore, more susceptible to decline in the event of rising mortgage rates. This situation is especially concerning for both jurisdictions as population needing affordable housing is high and there is a need to stabilize the market.

FAIR HOUSING STATUS

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

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

Source: Aggregate Report by Bureau of Consumer Financial Protection

[D] FAIR HOUSING STATUS

D) FAIR HOUSING STATUS

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

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

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

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

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

Complaints of Unlawful Discrimination

In 2010, Knoxville City conducted its second Analysis of the Impediments to Fair Housing Choice. HUD defines this procedure as a "comprehensive review of policies, practices and procedures that effect the location, availability and accessibility of housing and the current residential patterns and conditions." In order to accomplish this task, we have examined existing studies and literature, conducted a historical analysis, reviewed the public policies from a fair housing perspective, analyzed the effectiveness of existing fair housing activities and examined barriers to fair housing choice for each protected class. Between 2010 and 2014, Knox County received no Fair Housing complaints directly, and the Knoxville HUD Field Office reported receiving no complaints. THRC has however confirmed that a few cases have been filed, status of which is awaited and will be added when it is available. Meanwhile, data from Office of Fair Housing and Equal Opportunity has been included in table format below. Table 10.1 shows the number of complaints that have been filed over the years with the Office of Fair Housing and Equal Opportunity. In 2016, 11 cases were filed against Knox County out of which 7 were filed on a racial basis. Six out of the 7 racial based cases were filed under African American race basis and 1 was filed under a Black and White Race basis. Four cases were filed with a disability basis, one case was filed with a familial status basis, and one case each was filed with a sex basis and with a retaliation basis. This data is collected and published on a county level so, until a further report is obtained from THRC it will be difficult to analyze these cases for Knoxville and Knox County.

FAIR HOUSING STATUS

In response to the question "Are you familiar if any group or individual has filed complaints against a lending institution with any Federal, State, or local regulators, or initiated legal actions on the basis of fair housing discrimination" in the stakeholder survey, two respondents answered "yes" and further in response to "Have you encountered cases where insurance companies have cancelled or increased premiums on properties that participate in Section 8 housing/vouchers/low-income housing," 5 participants gave an affirmative answer.

It can be extremely difficult to detect unlawful discrimination, as an individual home-seeker, and the resolution of these complaints, subsequent investigation, is also important to consider. The following are the definitions utilized:

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

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

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

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

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

Tennessee Human Rights Commission (THRC) has reported that during January 1, 2017 – December 31, 2017, the agency accepted a total of 14 housing complaints from Knoxville/Knox County for investigation. Of that number, there were four (4) no cause determinations; four (4) conciliations in which three (3) of the four (4) received no monetary compensation; three (3) with resolution; and three (3) without resolution.

During January 1, 2018 – December 31, 2018, the agency accepted a total of 12 housing complaints for investigation from Knoxville/Knox county. Of that number, one case was caused; five (5) were no caused; four (4) conciliations in which three (3) of the four (4) received monetary compensation; one complainant was unable to be located; and one without resolution.

During January 1, 2019 – December 31, 2019, the agency accepted a total of 14 housing complaints for investigation from Knoxville/Knox County. Of that number eight (8) are currently still under investigation; two (2) were no caused; one conciliation with monetary benefits; two (2) with resolution; and one where the complainant failed to cooperate.

Table 10.1 Filed cases against Knox County from 2013-2016

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

Source: Office of Fair Housing and Equal Opportunity

Progress in Dealing with Impediments from 2010

The City's 2010 Impediments to Fair Housing were as follows:

Impediment 1: Market Availability

+ The unwillingness of some members of the community to support the development of affordable housing within their neighborhoods has resulted in a lack of affordable housing for protected class persons, especially those persons with disabilities. This is referred to as the "Not in My Back Yard" or "NIMBY" syndrome. Additionally, some landlords do not want to rent to people with disabilities. Unfortunately, this syndrome continues to be a significant impediment to fair housing choice. Public hearings concerning proposed affordable housing projects bring objections mostly from neighbors who cite adverse effects on traffic, infrastructure, and public services, schools, the environment, property values, and crime rates. However, the desire to maintain a neighborhood's socioeconomic homogeneity and exclusivity is frequently unstated.

Suggested Steps to Remove this Impediment were:

 Since this is partially a continuing impediment from the 2005 A.I. and similar to one in Knox County, the City should continue to expand affordable housing options for very low, low and moderate-income residents, including subsidized housing residents and homeless persons who seek to move into subsidized private housing.

- Through communication and outreach to neighborhoods, the City should continue to address objections to siting affordable housing and continue to make effective use of its HOME, CDBG, ESG and other housing resources to encourage the development of safe, decent and sanitary affordable housing to such residents
- 3. The City should continue to coordinate efforts with the County in order to maximize response efforts on regional NIMBY issues.

Impediment 2: Protected Class Discrimination in the Homebuyer Lending Market

- Often Protected Classes are not equal partners in the home buying market in the City.
- + Prime lenders had few applications and high originations and subprime lenders had high applications and few originations
- + Loan data show an under representation of applicants for loan applications and denials based on debt to income ratios and credit history. These are factors which could point to disinvestment in low/mod neighborhoods which limit access to home improvement loans, access to refinancing loans and access to funds to afford new homes. This situation is similar to Knox County

Suggested Steps to Remove this Impediment were:

1. Lenders need to be made aware of this issue and initiate positive efforts in establishing a broader market.

- Working with local lenders, the City should do further analysis of lending data to determine to what extent disparate treatment of protected classes accounts for loan denials.
- 3. The City should take an active role in monitoring Home Mortgage Disclosure Act (HMDA) data to insure that lenders continue to equalize lending practices. The city should continue to encourage programs that provide credit counseling and repair, financial fitness and provide down-payment assistance for qualified low-income buyers.

Impediment 3: Public Policy Implementation

- Lenders need to be made aware of this issue and initiate positive efforts in establishing a broader market.
- Working with local lenders, the City should do further analysis of lending data to determine to what extent disparate treatment of protected classes accounts for loan denials.
- 3. The City should take an active role in monitoring Home Mortgage Disclosure Act (HMDA) data to insure that lenders continue to equalize lending practices. The city should continue to encourage programs that provide credit counseling and repair, financial fitness and provide down-payment assistance for qualified low-income buyers.

Suggested Steps to Remove this Impediment were:

1. City Staff should continue the current strategy of addressing fair housing in all departments and programs by articulating supportive government-wide civil rights policies and training for staff involved in activities related to fair housing. The City should also be careful in adopting land use policies and related zoning that would have the effect of limiting fair and affordable housing opportunities. Additionally, the City needs to continue support of rental and homeownership development in areas where assisted and affordable

housing may not be readily available to protected classes. Finally, the City needs to continue to support the development of affordable housing through strategies such as the homemakers program that help to incentivize the purchase of real estate in low-mod areas.

Impediment 4: Need for Permanent Supportive Housing

+ There are limited housing opportunities for persons that are homeless, those who are at risk of homelessness, and special needs populations. There is limited funding for the development of permanent supportive housing, and as mentioned in Impediment #1, opposition to building such housing throughout the City The City faces the challenge of securing funds to build and operate permanent supportive housing and finding locations to meet the needs of the residents

Suggested Steps to Remove this Impediment were:

 The City will continue to use its CDBG, HOME and ESG as well as NSP funds to increase the number of permanent supportive housing units in Knoxville and support the case management activities needed to assist the chronically homeless population and those at risk of homelessness

The City noted that all the barriers still exist, and they are working continuously to overcome these barriers. The largest barrier, according to the city, in developing affordable housing is the lack of financial resources and subsidies needed for development and operating. The Low-Income Housing Tax Credit program run by the State through the Tennessee Housing Development Agency (THDA) provides the largest amount of funding for affordable housing, but it is very competitive and costly to access. The larger, more experienced developers are successful in obtaining awards of tax credits and can afford the costs to access the funds. Smaller, less experienced developers have a difficult time competing, and if successful, receive less equity when syndicating the credits. The City's Affordable Rental

FAIR HOUSING STATUS

Development Fund (ARDF) established in 2017 has helped to fill the financing gap for development of affordable housing throughout the City with close to 900 new affordable units completed, under construction or in the pipeline.

Another barrier that still exists to developing affordable housing is the lack of community support (NIMBY) due to perceived ideas about the negative impact of such housing. While some neighborhoods in recent years have welcomed new developments, others have voiced strong opposition often citing issues such as decreasing property values, traffic impacts, school overcrowding and loss of open land, when in fact the proposed developments have had no negative impact or in some cases improved those concerns.

The City has adopted a new zoning code which allows mixed-use development (housing and commercial) in a number of areas that were strictly commercial previously. This will expand the availability of potential housing sites particularly of the major corridors outside of the City center. Additionally, the establishment of the ARDF has been successful in incentivizing development of affordable housing. The City partnered with Knoxville's Community Development Corporation (KCDC) the local public

housing agency and provided \$13 million for infrastructure improvements to the revitalization of the Five-Points neighborhood, a former dilapidated public housing site, resulting in a new neighborhood with attractive affordable housing, new sidewalks, lighting, green space, and play areas. The City will be investing approximately \$10 million in infrastructure improvements to KCDC's Austin Homes revitalization project, a master planned new mixed-income development on a former public housing site. This project will create a new neighborhood, adjacent to the City core, with new housing, street and sidewalk connectivity to downtown, lighting and landscaped open space. The City's focus on the importance of affordable housing for the last five years through financial support and education of citizens about the need has strengthened public support.

Educational presentations with data-backed evidence about the need for affordable housing have been held in numerous public meetings, workshops and with community groups since 2016. An affordable housing fact sheet has been developed and updated regularly to promote an understanding of affordable housing needs. This is located on the City's web-site and provided to groups on a regular basis.

[E] PUBLIC SECTOR ANALYSIS

Overview

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

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

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

Knox County and Knoxville annually provides agency training in Affirmatively Furthering Fair Housing. The requirement to make HUD-compliant Fair Housing materials available is shared with all participating agencies, and materials are made available at the Fair Housing training. The City will also continue to conduct the following activities that affirmatively further fair housing: Counseling and referrals, as necessary, to the Tennessee Human Rights Commission; Education and outreach to residents, housing providers, lenders, social/human service and general community; Dissemination of information to the local news media on fair housing and equality issues and activities; Participation in training sessions, workshops, and conferences; Developing and Promoting Fair Housing training with landlords who participate/are interested in participating in the City's Rental Housing Rehabilitation and Development program; Visible placement of equal opportunity housing logo on relevant City publications and housing programs that use City, CDBG, HOME, and ESG funding; Staff support and/or technical assistance to the Equality Coalition for Housing Opportunity, the Council On Disability Issues, Disability Resource Center, Knoxville-Knox County Homeless Coalition, and Dr. Martin Luther King Jr. Commemoration Commission; Operation and/or funding of programs which promote housing opportunities, such as homeownership education and down payment assistance, housing improvements, and new housing development; Monitoring and studying fair housing and equal opportunity compliance; and Promoting applicable civil rights legislation and regulations relative to fair housing and equal opportunity.

For public meetings and citizen input opportunities, the following measures are taken: Notice of all meetings are published in the local newspaper and posted on the city website in both English and Spanish. Community Development provides Braille materials, materials recorded on audiocassettes, and interpreters for the hearing impaired with a week's prior notice of special needs. Community Development is committed to meeting the needs of non-English speaking residents in the case of public hearings where a significant number of non-English speaking residents are expected

to participate. Foreign language interpreters and materials translated in the appropriate language will be provided with a week's prior notice of need.

In order to garner citizen input, the city also sends information to over 40 agencies and non-profit organizations inviting the agency/organization and requesting the information be made available to their clients such that it reaches a bigger section of protected classes.

Transportation

Transportation links are an essential component to successful fair housing. Residents who do not have access to commercial areas are limited in where they can shop for goods and services, as well as seek employment. The converse is true as well. Inadequate transportation routes limit the selection of housing to neighborhoods within transportation service areas. Convenient roads in good repair are as important for those who rely on their own vehicles for transportation as they are for those who rely on public transportation. Knox County Community Action Committee (CAC) Transit provides accessible, demand response public transportation services to Knox County residents who live outside Knoxville city limits and to residents residing in areas in Knoxville that are not covered by Knoxville Area Transit (KAT) Transit. CAC Transit is available for \$2 per ride and rides can be scheduled a day before the planned trip. Knoxville is served by their own transportation system called KAT which serves 23 fixed routes and covers over 1,100 bus stops. Additionally, Knoxville also has a free trolley line that serves the downtown and university area.

Knox County CAC Transit and ETHRA provides public demand response transit services in the urban area. Knox County CAC Transit also operates the Volunteer Assisted Transportation (VAT) program that provides services for seniors and individuals who are disabled who require additional assistance during their trips. Large urban areas like Knoxville receive federal funding called Section 5310 "Enhanced Mobility of Seniors & Individuals with Disabilities." Agencies providing transit service within the urban area must apply for funding through the Transportation Planning Organization (TPO). At

least 55% of the funds are for capital projects, and 45% may be used for operations. The TPO administers a project selection process that involves an open call-for projects from non-profits, governmental agencies, and private operators. The TPO for FY 2016 was apportioned by FTA \$541,437. Over the TPO's first four years, the annual allocation has seen slight growth. In FY 2015, funding was awarded to six different agencies and nonprofits for the purchase of 10 vehicles to transport elderly or disabled passengers. It is expected that these types of projects will be continued as long as the Section 5310 program funds continues to be allocated.

Transportation planning in Knox County is managed by the Transportation Planning Organization (TPO), which is composed of elected officials, transportation experts, and citizen representatives for the area. Access to all forms of transportation, including for low to moderate income families, are considered by the TPO. Knox County does not currently have a municipally operated public transit system. The county instead has a wide variety of public facilities distributed across all areas of the county, including in low to moderate income areas. In lieu of having to travel downtown, citizens can access vital government services from the County Clerk, Trustee, and Sheriff near the areas where they live. Additionally, Knox County operates a robust network of Senior Centers and libraries, with broadband access available at no charge. Employment centers are available as well, though it should be noted that they are operated by the State of Tennessee.

Mobility Plan 2040 was adopted by the TPO Executive Board on April 26, 2017. The Mobility Plan 2040 is the long-range transportation plan for the Knoxville region. Based on input from regional residents, stakeholders, and elected officials, it guides transportation decision-making in the region over the next two decades. The plan recognizes that one in four residents will be a senior by 2040, and the plan suggests investing in alternative transportation options such as transit and pedestrian facilities. As part of our Mobility Plan 2017 Project application and evaluation, they take into consideration the Americans with Disabilities Act (ADA) through equitable access criteria. Persons with disabilities are considered as part of the

vulnerable population criteria and included in the equitable access component of our project evaluation. As a result of the project application prioritizing equitable access, many of the Mobility Plan projects incorporate ADA accessible pedestrian improvements into the project scope making the transportation investment equitable for all users. Other funding priorities in the Mobility Plan include ADA paratransit services across the Region.

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

Neighborhood Revitalization

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

Property Tax Policies

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

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

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

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

Another common inequity is the assessment of multifamily dwellings at a higher ratio to market value than single family dwellings. This type of inequity may be considered a form of discrimination against low-income groups because a higher percentage of low-income than middle-income persons live

in multifamily rental dwellings. The requirement to pay a higher assessment is passed on to the tenant in the form of higher rent. Quite often, higher assessments also make it difficult for landlords to maintain property within the limits of the property's rent structure leading to substandard housing conditions.

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

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

Zoning and Site Selection

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

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

While the definition of a group care facility is broader in terms of the number of people that can be served and limited related to temporary disability, group housing is much more restricted in where it is permitted under current zoning designations. Family care homes are permitted under all single-family zoning districts as well as all multifamily and office use districts, neighborhood business districts (light commercial), agriculture districts and mixed-use districts (traditional neighborhoods). Group homes, on the other hand, are not permitted in any single-family zoning districts and are only permitted in the highest density multifamily residential districts and commercial, office and public and institutional districts. This serves to limit group homes located in single-family, and low-density multifamily districts to only small-scale homes (six persons or less) that serve those with temporary disabilities. Generally, the concept of group homes is to integrate them into neighborhoods, providing the maximum amount of independent living in a community-based environment. For example, those group homes that serve persons with permanent disabilities and/or more than six occupants, this neighborhood integration may be unattainable in some communities based on zoning restrictions. Knox County's land use plan requires that adequate public facilities be available for any development activities. In this context, "adequate public facilities generally refer to governmental strategies for assuring that all infrastructure required to meet the service demands of a particular development is available as development occurs. Such strategies can, where permitted by statute, require that the costs for all or a portion of such infrastructure be borne by the developer (ultimately the consumer), and not the general public. Currently, the policy of the communities within the County is that all streets, water, sewer, and storm drainage facilities within a subdivision, including any required water quality retention ponds, are paid for by the developer." The ability to provide affordable housing to low-

income persons is often enhanced by an entitlement grantee's willingness to assist in defraying the costs of development. Effective approaches include contributing water, sewer, or other infrastructure improvements to projects as development subsidies or waiving impact and other fees. These types of approaches help to reduce development costs and increase affordability, allowing developers to serve lower-income households. Knox County and Knoxville has historically sought to defray development costs by contributing land, utilizing CDBG for targeted infrastructure and utilizing HOME funds to encourage affordable housing.

Planning and Zoning

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

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

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

The City of Knoxville and Knox County have adopted zoning regulations as part of their code of ordinances. These ordinances detail a variety of zoning districts, uses permitted, and certain specifications for building and other site improvements. The City and County are working collaboratively to develop and innovate zoning regulations for the betterment of the community. In 2019, Re-Code Knoxville was approved, which allows mixed-use development (housing and commercial) in a number of areas that were strictly commercial previously. This will expand the availability of potential housing sites particularly of the major corridors outside of the City center by facilitating mixed-use, higher density housing and ease of development.

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

Affordable Housing Needs and Activities

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

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

The majority of these projects will be located in the unincorporated sections of the County. KCDC administers several Section 8 housing programs that provide housing assistance to low-income families in the private rental market, including The Housing Choice Voucher Program, which includes Veteran Affairs Supportive Housing (VASH), Family Unification Program (FUP)

public sector analysis

and Homeownership programs, the Moderate Rehabilitation Program and Family Self-Sufficiency programs. KCDC receives approximately \$22.6 million per year to fund up to 4,026 vouchers for Section 8 housing. Furthermore, all information related to their programs and plans is available on the KCDC website in English and Spanish.

In 2019, Knoxville's Community Development Corporation (KCDC) has earned high-performer status from the U.S. Department of Housing and Urban Development (HUD) following an assessment review. KCDC's high-performer status falls under the Section Eight Management Assessment Program (SEMAP), the federal agency's primary tool for evaluating Section 8 performance. The SEMAP review considers 15 performance indicators related to rent calculation, rental rates, leasing and unit quality. KCDC earned a score of 103 percent after receiving maximum points in all categories in addition to a bonus for deconcentrating poverty.

The U.S. Department of Housing and Urban Development has provided housing agencies with a crucial new tool called the Rental Assistance Demonstration program. RAD allows agencies to continue their housing mission without depending on federal funds. RAD allows public housing agencies to leverage public and private debt and equity to reinvest in the public housing stock.

KCDC adopted RAD in 2012. The program allows KCDC to convert public housing units to project based rental assistance property subsidized by funds from HUD's multifamily Section 8 department.

KCDC properties in Knox County, Autumn Landing and Nature's Cove are also a part of the RAD program. This has enabled KCDC to make significant property improvements to the 197 apartments at these sites.

Section 8 project-based rental assistance contracts ensure that units are permanently affordable to low-income households through a mandated 20-

year term that, by law, must be renewed for an additional 20 years. KCDC residents in these units pay 30 percent of their adjusted gross income toward rent and utilities, and utility costs will decrease as upgrades make units more energy-efficient.

The KCDC Board in May 2015 approved staff to apply to transition an additional 821 of our more than 3,500 units to the project-based rental assistance program.

In January, 2020 KCDC has been awarded 38 additional Section 8 Housing Choice Vouchers through HUD Mainstream Housing Choice Voucher Program to help local residents ages 18-61 with disabilities secure affordable housing. The program assists very low-income families and the disabled to afford decent, safe and sanitary housing in the private market

In April, 2020 KCDC's Five Points redevelopment has earned a 2019 Tennessee's Best award in the neighborhood stabilization category. The \$80 million redevelopment included construction of 336 modern, energy-efficient housing units through Hud's RAD program which used Low-Income Housing Tax Credits (LIHTC) and Community Investment Tax Credits (CITC) through Tennessee Housing Development Agency (THDA).

In July 11 2017, the City has funded its Affordable Rental Development Fund (ARDF) with \$5.5M in local, general operating funds. By 2019, 34 units have been completed, another 249 units are currently under construction. The City plans to add another 258 units within two years and a further 56 units are in the pipeline for approval. 'Southside Flats' is an example of a development under construction currently. When completed, it will provide 172 new apartment units affordable to households earning up to 60% Area Median Income (AMI). These new affordable units are located in close proximity to downtown Knoxville and the University of Tennessee, in the heart of a redeveloping area, with ready access to jobs, public transit and amenities coming to the area. The City also uses local funds in the Blighted Property

Redevelopment program to assist in the stabilization, development/redevelopment of blighted and vacant properties in neighborhoods - some of which now support affordable, rental housing. Additionally, the City of Knoxville has invested more than \$13 million in the Five Points site for extensive utilities replacement; new and widened streets; additional lighting; and sidewalk construction to improve walkability and connectivity of housing to the community.

The City will be investing approximately \$10 million in infrastructure improvements to KCDC's Austin Homes revitalization project, a master planned new mixed-income development on a former public housing site. This project will create a new neighborhood, adjacent to the City core, with new housing, street and sidewalk connectivity to downtown, lighting and landscaped open space. The City's focus on the importance of affordable housing for the last five years through financial support and education of citizens about the need has strengthened public support.

Over the last couple of years, Community Development staff were invited to speak about the need for affordable housing at over a dozen community and city-advisory group meetings. Several grassroots community organizations such as Justice Knox and the local NAACP are actively advocating for a sustainable fund for affordable housing.

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

Knox County Neighborhoods & Community Development has designed and implemented various housing assistance strategies that include homeowner

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

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

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

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

Affordable Housing Priorities from 2019 for Knox County

The PY2019-2020 Annual Action Plan identified expanding affordable housing Opportunities under which the County rehabilitated 6 rental units, and 105 homeowner housing. Some of the planned activities included:

Rehabilitation Projects
 Catholic Charities – Bathroom Upgrades - \$46,500/42

public sector analysis

Florence Crittenton - Housing Rehab for Youth Residential Care - \$100,000/10 CAC - Sustainable Housing Program - \$539,151/85 NHI - Minor Home Repair - \$45,000/20 Sertoma - Roofing and Bathroom Rehab @ (3) Group Homes -

Sertoma – Roofing and Bathroom Rehab @ (3) Group Homes - \$14,800/6 Housing Services - Administer Housing Services Program - \$46,644.20

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

Affordable Housing Priorities from 2019 for Knoxville

The PY2019-2020 Annual Action Plan identified expanding affordable housing Opportunities under which the following are planned:

- Community Housing Development Organization (CHDO) plans to construct 10 units of new affordable housing: 5 very low (31-50% AMI) income households and 10 moderate income households (50-80% AMI).
- + HOME funds to rehabilitate affordable rental housing units (including

weatherization/energy-efficiency improvements) and/or develop new affordable rental units. Approximately SO renter-households will be assisted: 20 extremely low (0-30% AMI) income; 20 very low (31-50% AMI) income; and 10 moderate (51-80% AMI) income households.

- + Maintain the city's affordable housing stock and to increase the number of affordable housing units for LMI homeowners and renters.
- + Assist approximately 48 homeowners with minor home repairs (less than \$4,999 each): 18 extremely low (0-30% AMI) income; 17 very low (31-50% AMI) income; and 13 moderate (51-80% AMI) income households.
- Provide accessibility improvements to approximately 10 disabled renter-occupied households: 5 extremely low (0-30% AMI) income; 4 very low (31-50% AMI) income; and 1 moderate (51-80% AMI) income households.
- The City of Knoxville is committing a significant portion its own local funding for affordable rental housing development with the ARDF (a total of \$5.5M since PY2017) and for grants to homeless organizations (a total of \$931,500 since PY2014). The State of Tennessee, through the Tennessee Housing Development Agency (THDA) has also contributed \$958,116 in HUD ESG funds since PY2014.

Institutional Structure

The Community Development Department of Knox County is the lead agency implementing the strategies for addressing housing and community development needs identified as part of its consolidated planning process. The Department, with County Commission approval, oversees the local allocation of Knox County's allocation of CDBG funds and is responsible for maintaining records, overseeing work done using these federal funds, and

reporting information to HUD concerning the performance of these programs. Knoxville's Community Development Corporation is responsible for the development and maintenance of the County's public housing. The member agencies of the County Continuum of Care Housing Coalition work with the County to address the ongoing needs of the homeless and persons with special needs. The County also coordinates its efforts with other local, state and federal institutions to address specific needs or to implement new programs. Affordable housing in the County is provided through a variety of public agencies, nonprofit organizations, private sector developers, and lenders. In many cases, individual housing providers focus their efforts on specific income groups, tenure types, or on providing certain types of housing and supportive services.

Intergovernmental Cooperation

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

Lead-Based Paint Hazard Reduction

Lead poisoning is one of the worst environmental threats to children in the United States. While anyone exposed to high concentrations of lead can become poisoned, the effects are most pronounced among young children. All children are at higher risk to suffer lead poisoning than adults; but children under age six are even more vulnerable because their nervous systems are still developing. At high levels, lead poisoning can cause convulsions, coma, and even death. Such severe cases of lead poisoning are now extremely rare but do still occur. At lower levels, observed adverse health effects from lead poisoning in young children include reduced intelligence, reading and learning disabilities, impaired hearing, and slowed growth. Since the 1970s, restrictions on the use of lead have limited the amount of lead being released into the environment. As a result, national blood lead levels for children under the age of six declined by 75 percent over the 1980s and dropped

another 29 percent through the early 1990s. Despite the decline in blood-lead levels over the past decade, recent data show that 900,000 children in the United States still have blood lead levels above $10\mu g/dL$ (micrograms of lead per deciliter of whole blood). These levels are unacceptable according to the Centers for Disease Control and Prevention (CDC) which lowered blood lead intervention levels for young children from $25\mu g/dL$ to $10\mu g/dL$ in 1991. Many of these lead-poisoned children live in low-income families and in old homes with heavy concentrations of lead-based paint. The CDC identified the two most important remaining sources of lead hazards to be deteriorated lead-based paint in housing built before 1978 and urban soil and dust contaminated by past emissions of leaded gasoline. The national goal for blood lead levels among children ages six months to five years is to limit elevations above $15\mu g/dL$ to no more than 300,000 per year and to entirely eliminate elevations above $25\mu g/dL$.

Many housing units in the County and City may have lead-based paint as noted earlier in the housing age section of the analysis. Since the County undertakes the rehabilitation of limited to comprehensive rehabilitation of housing units (many of which were constructed prior to 1978, refer Chart 8.1), painted surfaces will be disturbed as part of this process. As such, the jurisdictions are required to incorporate lead-based paint hazard evaluation, approved remediation/reduction strategies and clearance requirements for all housing structures built before 1978 To reduce the potential for adverse health effects attributable to the rehabilitation of deteriorated lead-based paint surfaces, the jurisdictions provide educational material for knowledge about it. All customers receiving housing rehabilitation assistance from the city are informed about the potential health hazards posed by the presence of deteriorated lead-based paint, which includes information about protecting their families from this hazardous substance.

The City of Knoxville has received two Lead Hazard Control Grants totaling \$6.1 million in the last five years. Currently, lead testing and abatement is underway for 160 qualified housing units.

City of Knoxville has a HUD funded program called the "Knoxville Lead-Safe and Healthy Homes Program," that identifies, and controls lead based paint hazards in eligible privately-owned rental and owner-occupied housing. For a unit to be eligible for funding and assistance, it must be located within the City of Knoxville and built prior to 1978. The total household income must be below 80% of Area Median Income. The City assists all rental units, and owner-occupied units must meet one of the following conditions:

- + A child under the age of 6 who resides in the unit, or
- + A child <u>under</u> the age of 6 who spends a "significant amount of time" in the unit, or
- + A pregnant woman who resides in the unit

If qualified, selected units receive a grant for repairs designed to remediate lead-based paint hazards. Repairs may include replacing old wooden windows with new vinyl windows, vinyl siding and aluminum trim, covering porch floors and ceilings, and fresh paint. A certified Lead-Based Paint Inspector/Risk Assessor will perform a non-invasive test of the property and identify lead paint hazards. The cost of this test is covered by the grant. The resulting report contains recommendations that guides the work to be performed. The project is assigned to a qualified general contractor that is certified as a State of Tennessee Lead Abatement Firm. These contractors are licensed, insured and experienced in the lead hazard control industry.

During work, specially trained and State Certified Lead Abatement Supervisors and Workers will make repairs using lead safe work practices including the setting up of containment areas that will keep lead dust from spreading throughout your home. After work is completed, they will utilize specialty cleaning methods to remove lead dust that remains. At the end of work, a Clearance Test is performed by a third-party inspector. This test consists of lab-analyzed dust wipes and a visual inspection that determine whether the work areas are safe to re-occupy. Once the passing results are received, re-occupation is allowed. Program Staff will also monitor and inspect work to ensure safety, proper installation of items and quality of

work. City of Knoxville Building Inspectors will also inspect to ensure work is completed to meet code requirements.

Additionally, to build local capacity of trained and certified individuals and firms to safely and effectively address lead hazards during lead hazard control, renovation, remodeling, and maintenance activities; the Knoxville Lead-Safe and Healthy Homes Program plans to provide free of charge, State of Tennessee certified lead-based paint Abatement Worker and Abatement Supervisor classes. An additional stipend to assist with the payment of the state credential may be available upon successful completion of the training session (as funding is available). The Environmental Protection Agency's Renovation, Repair, and Painting (RRP) Program (Initial Training) may be offered as well. The Program seeks to provide training, employment, contracting, and other economic opportunities generated by this program to low- and very-low income persons, particularly those who are recipients of government assistance for housing, and to businesses that provide economic opportunities to low- and very low-income persons in the Knoxville area.

The Knoxville-Knox County Community Action Committee (CAC) assists Knox County with housing rehabilitation and construction. CAC is responsible for compliance with the requirements related to lead based paint identification and mitigation as established in HUD's 24 CFR Parts 35 and 570.608.

In the Knox County Sustainable Housing – Home Repair Program, CAC refers to the following exemption:

For emergency actions immediately necessary to safeguard against imminent danger to human life, health or safety, or to protect property from further structural damage (such as when a property has been damaged by a natural disaster, fire, or structural collapse), occupants shall be protected from exposure to lead in dust and debris generated by such emergency actions to the extent practicable. This exemption applies only to repairs necessary to respond to the emergency.

CAC or approved contractors shall utilize safe work practices and protect occupants from exposure to the extent practicable, as necessary, for work that disturbs paint, and will provide homeowners assisted by this project with the required notification of lead-based paint hazards."

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

[F] PRIVATE SECTOR ANALYSIS

F) PRIVATE SECTOR ANALYSIS

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

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

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

Lenders in Knoxville and Knox County

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

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

There were 564 financial institutions that were reported for the 2018 Aggregate report for Knoxville MSA area which has increased by 120 from the other 2017. 20,474 conventional loans related activities were reported for the year 2018, including 13,183 originated loans, 3,556 denied applications, and 3,735 purchased loans. While the physical presence of financial institutions in communities facilitates relationships with banks and the location of these institutions is a primary concern for a community, the advent of online banking has increased both the choice of mortgage products and the overall competitiveness in the lending industry.

Alternative Lending Sources

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

Introduction

"Payday Lenders": Another source of loans is check cashing or "payday" lenders. Check cashing outlets (such as currency exchanges) cash payroll, government, and personal checks for a fee. Their popularity increases as customers lose access to banks or cannot afford rising fees associated with the inability to maintain minimum balance requirements. Consumers use these outlets for their banking needs and are charged for the services they receive. These businesses offer temporary "payday loans" by accepting a postdated check from the customer, who receives the funds immediately, minus a fee. When used regularly, these fees can equate to double-digit interest rates.

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

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

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

opportunity to reap profits. In the end, borrowers pay substantially higher interest rates and purchase unnecessary credit, life, and disability insurance products.

Advertising

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

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

An online analysis of the apartment listings in the local the Knoxville Area Yellow Pages and Yellow Book showed that only a few of the apartment complexes or purveyors carried a display ad. There was no equal opportunity logo on apartment listings, but websites of a few apartment complexes had the equal opportunity logo located at the bottom.

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

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G) CONCLUSIONS AND RECOMMENDATIONS

The City of Knoxville and Knox County have seen a steady increase in population over the last decade. With the national trend of aging population and increase in minority populations, it is pertinent that the jurisdictions proactively adjust policies and procedures for its continued success. Tennessee Housing Development Agency (THDA) reported that affordability from 2008-2012 to 2013-2017 has decreased in Knox county by 2.5 to 5%. The housing price appreciation in Knoxville Metropolitan Statistical Area (MSA) has stressed the existing stock of housing. Further, the regional growth is expected to create need for housing, employment, services, and transportation. With appreciation of home value and decrease in affordability, these HUD jurisdictions can actively partner with non-profits, and private developers to plan strategies that create affordable units. The jurisdictions can continue its current fair housing practices including public outreach and participation in regional fair housing trainings and opportunities.

In the community web-based survey conducted for City of Knoxville and Knox County, 60% of the respondents reported that lack of affordable housing options in preferred neighborhoods is an impediment to affordable housing, almost 50% reported that housing options were limited, 32% responses indicated that income source and access to credit was a barrier to affordable housing. 1 out of 62 respondents noted that they have had trouble finding housing information in their preferred language and 13 respondents reported that affordable housing options were far away from their place of work. Following responses were suggested by respondents as improvements to affordable and accessible housing in the city and county:

- Adequate sidewalks that are safe and maintained for wheelchair users, curb cuts for wheelchair users, mixed-income housing maintained in increasingly gentrified neighborhoods
- + We desperately need more decent affordable housing

- + Control the market cost. \$250-300K for a first time home owner is too much to ask!! None of the safe neighborhoods are affordable anymore
- + Financial help to build SMALLER projects. As it stands, ONLY large developers are able to participate.
- + Why is the CoK and Knox County insisting on concentrating poverty? We don't need a lot of units in one development for affordable housing. SPREAD IT OUT AND WESTWARD.
- + More affordable housing for low income families
- + We need higher-density within city limits, with more small apartment buildings interspersed within existing neighborhoods.
- + We need more city grant programs to beautify areas and remove abandoned or unused homes/commercial buildings.
- + Easy access to information provided to those seeking affordable housing other than online information.
- + Harassing City Codes enforcement is the main reason I would leave the City of Knoxville but stay in or around Knox County.
- Rent control Requiring developers to include affordable housing in projects Restrict house flipping Create dedicated revenue source for city's affordable housing fund
- + Transportation and bike lanes available further out of the city limits
- + Access to healthcare, transportation and groceries via sidewalks and bike lanes.
- Connection between affordable housing and good public transit is very important
- + Affordable single house, in good shape

- Please worry more about cleaning vacant lots. Enforcement of codes. Keeping our neighborhoods safe. Affordable housing is all over Knoxville in East, West, North, South. Those who say otherwise just want to create cover for those with screwed up priorities
- Stop doing the same. Times have changed. Need new remedies, creative, logical approach. Collaboration. A COMPLETE OVERHAUL of archaic ones continue to utilize. Need NEW minds and ideas-Utilize those or combo of positive results from across nation.
- + For a person who relies on public transportation for work, affordable housing options are minimal. Knoxville should work with major industrial employers (e.g. Denso in Maryville) to establish commuter transport from Knoxville.
- Increase supply of affordable housing
- People should make enough money to live in the community they work in.
- + I would like the landlord stop price gouging and I would be able to purchase a home.
- + More affordable housing for seniors and those who are low income.
- I would like affordable housing for all.
- + More diverse neighborhoods.
- + Help the elderly! If can't keep house clean they are kicked out due to bed bugs and become homeless
- + Legal counsel for renters under an eviction notice. 3/9/2020 9:49
 AM 27 More rental subsidies for low-income households.
- I would like to see developers required to build sidewalks and consider walkability and accessibility when building housing and housing-adjacent developments in Knox County. I would like to see more developers construct housing options along major transit

corridors like Broadway and Magnolia Avenue. Perhaps City and County government could provide incentives for proposals. I'd like to see additional City and County investment in the BankOn initiative (via United Way) which promotes the availability of no-cost or lowcost checking and savings account options from local financial institutions for people who don't traditionally use banks. These opportunities can help people of moderate incomes build wealth and financial stability, which can either include homeownership or not. I'd like more independent landlords with, say, 20 or fewer properties, engaged in City and County programs to improve their properties' energy efficiency and, also, comfort and affordability for the renters. I'd like to see additional City and County funds support KnoxWorks, the program that trains young people in construction trades, and the CAC program that helps income-limited households make major and minor repairs to their homes so they can continue to live there and not be displaced.

+ Both areas of our community need more affordable rental housing and affordable homes to purchase

The stakeholder web-based survey conducted for City of Knoxville and Knox County recorded 21 participants from various organizations including CAC, KCDC, Knoxville Habitat for Humanity, East Tennessee Community Design Center, Knoxville Equity Partners, Held Law Firm and Childress & Held Rental, KLF, C.O.N.N.E.C.T Ministries, Volunteer Ministry Center, City of Knoxville, and Knox County. 11 participants noted that Lack of quality affordable housing in desired geographical areas is the key issue to fair housing choice in the City/County. When asked about potential strategies that can promote affordable and accessible housing for all, the following suggestions were made by the stakeholders:

- + Create more loans, and classes for individuals that can learn about how to start building housing in low income areas.
- Stop allowing rich white people to control everything.

- + Access to information and education that supports informed decision making around affordable housing. All aspects of it. Affordable housing is so much more than being able to pay your rent or mortgage. It's being able to handle emergencies, providing for yourself and your family without having a negotiate a bill. Deciding what gets paid and what doesn't. Quality of life shouldn't be determined by income level. We need to offer our community options they can access and use. More compassion, less capitalism.
- + Be fair no matter the race, sex or religion of all citizens
- + More funding. And not just funding for private developers that goes away after a few years. Permanent funding
- + Fire the current city development people and replace them with people who work directly with poor people. Give funding directly to poor people rather than to larger institutions with the expectation that the money will trickle down.
- + East tennessee community design center could be a key player in these initiatives as well as volunteer professionals. also suggest that local developers like lhp development be engaged
- + Incentive developers who build single family housing in an effort to increase housing stock/supply driving the cost of housing down.
- + More meeting with new mayor.
- help identifying property and work to finding in partnership with low income housing developers funding streams to help finance more projects.

- + Develop very small, modest efficiency and 1 bedroom apartments that can be rented for 25% of minimum wage, 2 bedrooms for \$600, and three bedrooms for \$900.
- + Financial Literacy as a requirement to retain you HUD Section 8 or Voucher. 2). If you are new to Section 8 or the HUD Voucher a requirement would be basic home maintenance course and financial literacy education with a MOU signed with the lease.
- + Accountability from its occupants. Establish Section Resident Association by assigning responsible tenants to monitor neighbors as needed to care for the maintenance and care of that assigned unit. Random checks to ensure no illegal activity. Regardless of income levels, each person should be accountable for maintaining their property and educated to move on to the next level of housing-"affordable home-ownership."
- + Have community focus groups with neighborhoods and individuals who are struggling with housing insecurities. they will tell you what you really need to hear to address the issue of housing. In my opinion if we are going to continue to have low paying jobs that keep our citizens in poverty then we can at least give them a descent place to raise their families. Most of our homeless population are working full-time jobs and are still living in cars! how this ever became acceptable to the point that we are seeing second gen young people wanting a car so they have a place to live is just unimaginable and disgraceful!
- + more affordable housing for single individuals and families with 4+ children.
- + Continued funding for housing programs.

- + Small Area Fair Market Rents targeted at specific zip codes
- + My only suggestion would be to find funding for more affordable housing options which seems to be the big issue at the moment.

Based on the analysis, discussions with stakeholders and comments from the public and stakeholder survey, the following list of impediments to fair housing choice in the City of Knoxville and Knox County have been prepared. The list of impediments and recommendations is not all-inclusive but provides the jurisdictions with useful strategies for implementation. Since work is going on to address the recommendations from the last AI, we highly recommend that the City and County keep working on the previous recommendations and start planning for the ones mentioned below. These impediments will be substantiated further with input on the draft from the stakeholders, and second public meeting

1) Limited housing stock and homogeneity in housing units. Changing family sizes, lifestyles, and work preferences have to be reflected in the housing type and sizes. Several organizations are trying to work with low-moderate income families to increase, maintain, and afford housing suffer because of lack of funding. However, the cost of land makes it financially challenging to create affordable housing without a subsidy or incentive.

Recommendations:

- + Lobby for mandatory inclusionary zoning: The State of Tennessee does not allow cities to implement inclusionary zoning. Inclusionary zoning is a policy that was first developed in the 1970s in response to exclusionary and often racially segregated zoning. It's a popular tool for getting the private market to subsidize affordable housing.
- Private landlords need to be encouraged to accept Section 8 and special project vouchers. One way would be to have a mitigation fund for landlords to help with any loss of rental income and damages past

what their insurance covers to help offset some of the cost they incur in case of renter's inability to comply.

2) Transportation corridors have connectivity problems and lack integration with Low-moderate income residential areas and employment centers. People travelling between the two jurisdictional areas are suffering from lack of transit options and convenience in using transit. Accessibility issues within the city and county are due to lack of Accessible sidewalks, unsafe bus stops, and lack of accessible features in the city's and county's infrastructure. Lack of sidewalks and bike lane facilities in the county and problems with connectivity within the city have been the most common community survey response to the question of probable impediment to affordable housing.

Recommendations:

- + With the changing need of the demographics, the City and County should invest in a combined transit plan and devise ways to make transit more accessible and seamless between the two. Investment needs to prioritize Accessible sidewalks, bike lanes, bicycle facilities, and bus stops. Alternative transit routes that connect city to the county, especially the employment centers during peak hours can be planned for. Additionally, the new zoning code and focus on energy efficiency will yield results when complete streets and alternative means of transportation are made effective in the City and County. Green infrastructure, such as complete streets, connectivity of Accessible sidewalks, an increase in bike lane facilities, will not only provide alternative transportation options and encourage walking, it will provide a sense of safety and freedom for people with mobility limitations
- + Public transit shelters with ramps and proper lighting can be planned at 5-minute walking distance or 0.25-mile distance from residential areas/multifamily dwellings for healthy individuals. For people who are elderly or have special needs the walking distance should be according to ADA guidelines.

- + Safe conditions that enhance walkability, continuous and evensurfaced Accessible sidewalks, ramps, slopes, lighting, and safe and well-maintained shelters have to go hand in hand to promote ridership and walkability.
- **3)** Mortgage lending practices need to be addressed since there were high denial rates among certain races. Low Income families of color are at a severe deficit compared to the income levels of other communities in the City and County, in terms of financial stability and employment opportunities. Seasonal employment opportunities are also a threat to fair lending practices and require educations programs to assist in the repair of credit histories.

Recommendations:

- + Fair lending institutes, along with government organizations, should provide an educational program to assist in the repair of credit such that the process of home ownership can be initiated for people with poor credit histories. Educational programs are needed to improve job opportunities and provide information that encourages financial literacy.
- + Federal, State, and local banking regulation should include educational opportunities in their lending practices to ensure that low income population has "access" to the opportunity to purchase "affordable housing."
- + Require basic home maintenance course as a requirement to retain HUD Section 8 housing and/or housing vouchers.
- + Accountability from occupants: Establish Section 8 Resident Association by assigning responsible tenants to assist neighbors as needed to care for the maintenance and care of assigned unit. Peaceful approach to this method could also be reporting of a careless or ignorant occupant to a non-profit which can then assist

- the occupant in maintenance. Regardless of income levels, each person should be accountable for maintaining their property and educated to move on to the next level of housing which is homeownership.
- + Home buying is a difficult process, and residents with limited English proficiency (LEP) have an especially hard time maneuvering the process because financial institutes do not have paperwork in languages other than English. We recommend that residents with LEP be given assistance in understanding the financial paperwork and process.
- 4) Local hire initiatives: Local governments should be able to require construction companies to hire a certain percentage of workers from the jurisdictional area. This helps in creating jobs and provide sustainability to the local economy. Its Tennessee's Contractors Licensing Act of 1994 prohibits counties and municipalities from imposing additional requirement on top of those imposed in the act and from discriminating against contractors licensed by the state on the basis of non-residency within the county or municipality.

Recommendations:

- + Local hiring mandates should be pushed for by joint efforts from the City and County. Within the hiring mandates, schemes could be devised where low-moderate income people could get preference in the hiring process. A robust, multi-prong initiative would be required at City and County level to ameliorate housing conditions without causing displacement. One small way is making people an asset rather than liability.
- + Creating more employment opportunities and helping unemployed householders by providing adequate training and skill development will improve their financial stability.

CONCLUSIONS AND RECOMMENDATIONS

- + The city can work proactively with financial institutions and banks to allow for more flexibility in payments and assist with background checks by reducing liability or providing assistance.
- 5) Lack of trust between the governmental organizations and the **community**. Lack of trust between community and the government entities has been mentioned in the survey responses.

Recommendations:

- + Transparency from the city and county about new projects, zoning regulations, and new schemes can go a long way in regaining the trust of the community.
- + Advertising and holding community events that encourage participation of city and county staff with the community can help as well. Each government employee can adopt a neighborhood and participate in the community events of that area. Additionally, propose community improvement projects and workshops in partnership with local churches or community centers.

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[A] APPENDIX

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE KNOXVILLE, TN

APPFNDIX

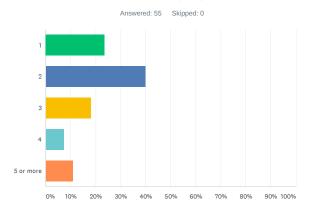
COMMUNITY SURVEY

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE FOR CITY OF KNOXVILLE AND KNOX
COUNTY COMMUNITY SURVEY

Q1 Please mention the zipcode you reside at

Answered: 55 Skipped: 0

Q2 Including yourself, how many people live in your house?

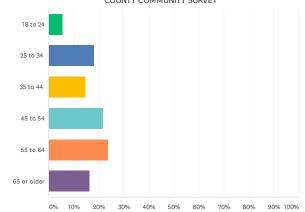


ANSWER CHOICES	RESPONSES	
1	23.64%	13
2	40.00%	22
3	18.18%	10
4	7.27%	4
5 or more	10.91%	6
TOTAL		55

Q3 Which of the following age groups do you identify yourself with

Answered: 55 Skipped: 0

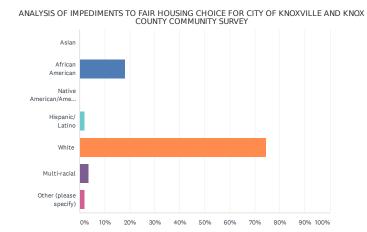
ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE FOR CITY OF KNOXVILLE AND KNOX COUNTY COMMUNITY SURVEY



ANSWER CHOICES	RESPONSES
18 to 24	5.45%
25 to 34	18.18%
35 to 44	14.55%
45 to 54	21.82%
55 to 64	23.64%
65 or older	16.36%
TOTAL	55

Q4 Which racial or cultural group do you identify yourself with?

Answered: 55 Skipped: 0

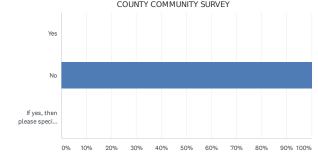


ANSWER CHOICES	RESPONSES	
Asian	0.00%	0
African American	18.18%	10
Native American/American Indian/ Alaska native	0.00%	0
Hispanic/ Latino	1.82%	1
White	74.55%	41
Multi-racial	3.64%	2
Other (please specify)	1.82%	1
TOTAL		55

Q5 Are you a student in Knoxville or Knox County

Answered: 55 Skipped: 0

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE FOR CITY OF KNOXVILLE AND KNOX COUNTY COMMUNITY SURVEY

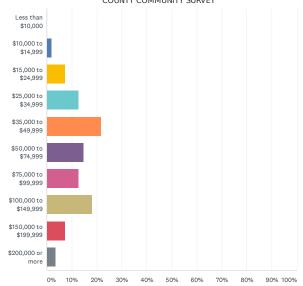


ANSWER CHOICES	RESPONSES	
Yes	0.00%	0
No	100.00%	55
If yes, then please specify the zipcode you reside at most of the year	0.00%	0
TOTAL		55

Q6 Please select an income range from the options below that represents your annual household income

Answered: 55 Skipped: 0

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE FOR CITY OF KNOXVILLE AND KNOX COUNTY COMMUNITY SURVEY



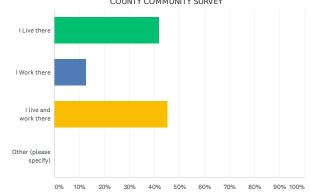
ANSWER CHOICES	RESPONSES	
Less than \$10,000	0.00%	0
\$10,000 to \$14,999	1.82%	1
\$15,000 to \$24,999	7.27%	4
\$25,000 to \$34,999	12.73%	7
\$35,000 to \$49,999	21.82%	12
\$50,000 to \$74,999	14.55%	8
\$75,000 to \$99,999	12.73%	7
\$100,000 to \$149,999	18.18%	10
\$150,000 to \$199,999	7.27%	4
\$200,000 or more	3.64%	2
TOTAL		55

Q7 What is your relationship to the City of Knoxville?

Answered: 55 Skipped: 0

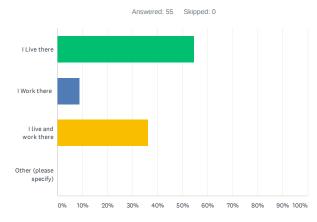
5/23

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE FOR CITY OF KNOXVILLE AND KNOX COUNTY COMMUNITY SURVEY



ANSWER CHOICES	RESPONSES	
I Live there	41.82%	23
I Work there	12.73%	7
I live and work there	45.45%	25
Other (please specify)	0.00%	0
TOTAL		55

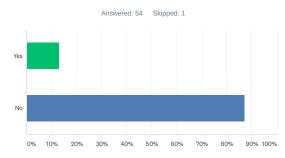
Q8 What is your relationship to Knox County?



ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE FOR CITY OF KNOXVILLE AND KNOX COUNTY COMMUNITY SURVEY

ANSWER CHOICES	RESPONSES	
I Live there	54.55%	30
I Work there	9.09%	5
I live and work there	36.36%	20
Other (please specify)	0.00%	0
TOTAL		55

Q9 Do you or any member of your family have a disability?

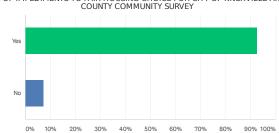


ANSWER CHOICES	RESPONSES	
Yes	12.96%	7
No	87.04%	47
TOTAL		54

Q10 Does the house or apartment you currently live in meet your or your family's accessibility needs?

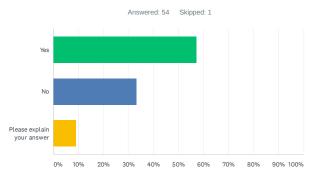
Answered: 54 Skipped: 1

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE FOR CITY OF KNOXVILLE AND KNOX



ANSWER CHOICES	RESPONSES	
Yes	92.59%	50
No	7.41%	4
TOTAL		54

Q11 Do you think that all people living in your neighborhood or apartment complex are treated the same?

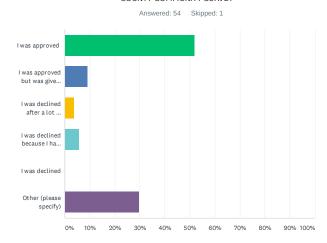


ANSWER CHOICES	RESPONSES	
Yes	57.41%	31
No	33.33%	18
Please explain your answer	9.26%	5
TOTAL		54

Q12 Have you experienced difficulty in getting a loan for your housing needs from local banks or lending institutions?

7 / 23 8/23

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE FOR CITY OF KNOXVILLE AND KNOX COUNTY COMMUNITY SURVEY

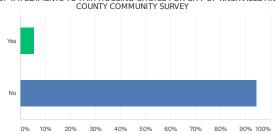


ANSWER CHOICES	RESPONSES	
I was approved	51.85%	28
I was approved but was given a higher rate of interest	9.26%	5
I was declined after a lot of paperwork	3.70%	2
I was declined because I have poor credit	5.56%	3
I was declined	0.00%	0
Other (please specify)	29.63%	16
TOTAL		54

Q13 Do you currently live in public housing or receive Section 8 rental assistance?

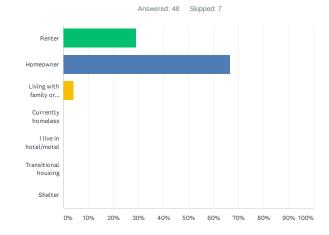
Answered: 55 Skipped: 0

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE FOR CITY OF KNOXVILLE AND KNOX



ANSWER CHOICES	RESPONSES	
Yes	5.45%	3
No	94.55%	52
TOTAL		55

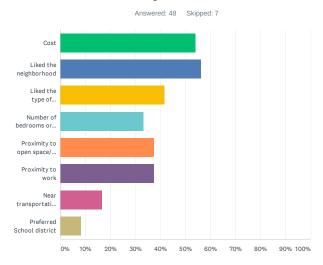
Q14 What is your current living situation?



ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE FOR CITY OF KNOXVILLE AND KNOX COUNTY COMMUNITY SURVEY

ANSWER CHOICES	RESPONSES	
Renter	29.17%	14
Homeowner	66.67%	32
Living with family or friends but not paying rent	4.17%	2
Currently homeless	0.00%	0
I live in hotel/motel	0.00%	0
Transitional housing	0.00%	0
Shelter	0.00%	0
TOTAL		48

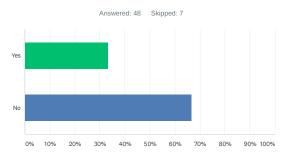
Q15 Select the top three reasons why you like your current house or neighborhood



ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE FOR CITY OF KNOXVILLE AND KNOX COUNTY COMMUNITY SURVEY

ANSWER CHOICES	RESPONSES	
Cost	54.17%	26
Liked the neighborhood	56.25%	27
Liked the type of home/apartment/building	41.67%	20
Number of bedrooms or space	33.33%	16
Proximity to open space/ parks/recreational activities	37.50%	18
Proximity to work	37.50%	18
Near transportation hubs like a bus stop	16.67%	8
Preferred School district	8.33%	4
Total Respondents: 48		

Q16 Would you like to move from your current home or apartment?

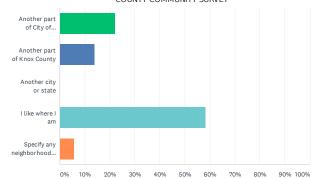


ANSWER CHOICES	RESPONSES	
Yes	33.33%	16
No	66.67%	32
TOTAL		48

Q17 If you answered YES to question 16, where would you like to move?

Answered: 36 Skipped: 19



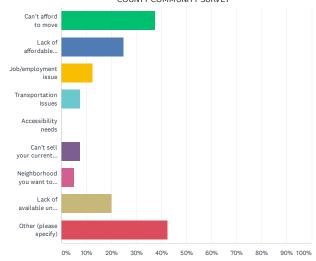


ANSWER CHOICES	RESPONSES	
Another part of City of Knoxville	22.22%	8
Another part of Knox County	13.89%	5
Another city or state	0.00%	0
I like where I am	58.33%	21
Specify any neighborhood or area of your choice/liking	5.56%	2
TOTAL		36

Q18 What are some factors that prevent you from moving (choose all that apply)?

Answered: 40 Skipped: 15

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE FOR CITY OF KNOXVILLE AND KNOX COUNTY COMMUNITY SURVEY



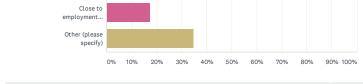
ANSWER CHOICES	RESPONSES	
Can't afford to move	37.50%	15
Lack of affordable housing options	25.00%	10
Job/employment issue	12.50%	5
Transportation Issues	7.50%	3
Accessibility needs	0.00%	0
Can't sell your current home	7.50%	3
Neighborhood you want to move to is not safe	5.00%	2
Lack of available units to rent or purchase	20.00%	8
Other (please specify)	42.50%	17
Total Respondents: 40		

Q19 What are you looking for in your next residence? Choose three options that matter most to you.

Answered: 46 Skipped: 9

Access to public transit Family-friendly , safe... Affordable, quality housing Close to schools Accessibility of the area

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE FOR CITY OF KNOXVILLE AND KNOX



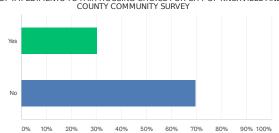
Close to recreational...

ANSWER CHOICES	RESPONSES	
Access to public transit	15.22%	7
Family-friendly, safe neighborhood	47.83%	22
Affordable, quality housing	52.17%	24
Close to schools	10.87%	5
Accessibility of the area	26.09%	12
Close to recreational areas, grocery stores, malls etc.	41.30%	19
Close to employment centers	17.39%	8
Other (please specify)	34.78%	16
Total Respondents: 46		

Q20 Have you tried finding affordable housing in the City of Knoxville or Knox County and could not?

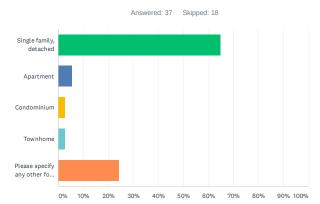
Answered: 46 Skipped: 9

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE FOR CITY OF KNOXVILLE AND KNOX



ANSWER CHOICES	RESPONSES	
Yes	30.43%	14
No	69.57%	32
TOTAL		46

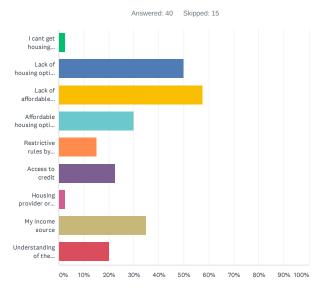
Q21 What type of housing are you looking for?



ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE FOR CITY OF KNOXVILLE AND KNOX COUNTY COMMUNITY SURVEY

ANSWER CHOICES	RESPONSES	
Single family, detached	64.86%	24
Apartment	5.41%	2
Condominium	2.70%	1
Townhome	2.70%	1
Please specify any other form of housing or amenities that you would like	24.32%	9
TOTAL		37

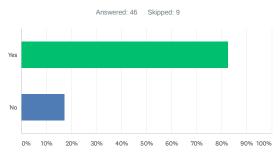
Q22 Please select any factors you believe act as barriers to affordable housing in Knoxville or Knox County



ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE FOR CITY OF KNOXVILLE AND KNOX COUNTY COMMUNITY SURVEY

ANSWER CHOICES	RESPONSE	ES
I cant get housing information in Spanish or other preferred language for my paperwork	2.50%	1
Lack of housing options that I can rent or purchase	50.00%	20
Lack of affordable housing options in the neighborhood of your choice	57.50%	23
Affordable housing options are too far away from my work	30.00%	12
Restrictive rules by developers, builders, or homeowner associations	15.00%	6
Access to credit	22.50%	9
Housing provider or neighborhood associations would not make accommodations for my disability	2.50%	1
My income source	35.00%	14
Understanding of the home-buying process	20.00%	8
Total Respondents: 40		

Q23 Do you understand your fair housing rights?

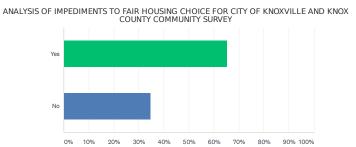


ANSWER CHOICES	RESPONSES	
Yes	82.61%	38
No	17.39%	8
TOTAL		46

Q24 Have you seen or heard information regarding Fair Housing laws, programs, and enforcement within the City of Knoxville?

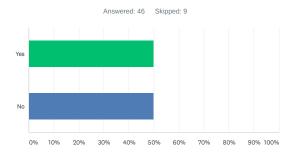
Answered: 46 Skipped: 9

18 / 23



Yes 65.22% 30 No 34.78% 16 TOTAL 46	ANSWER CHOICES	RESPONSES	
NO	Yes	65.22%	30
TOTAL 46	No	34.78%	16
10112	TOTAL		46

Q25 Have you seen or heard information regarding Fair Housing laws, programs, and enforcement within Knox County?

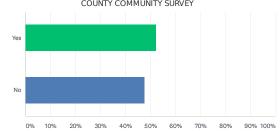


ANSWER CHOICES	RESPONSES	
Yes	50.00%	23
No	50.00%	23
TOTAL		46

Q26 Do you know where to file a housing discrimination complaint?

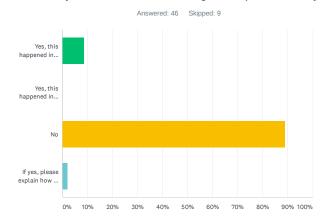
Answered: 44 Skipped: 11





ANSWER CHOICES	RESPONSES	
Yes	52.27%	23
No	47.73%	21
TOTAL		44

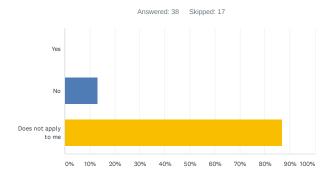
Q27 Since living in Knoxville and/or Knox County, have you experienced housing discrimination based on your race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18), or disability.



ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE FOR CITY OF KNOXVILLE AND KNOX COUNTY COMMUNITY SURVEY

ANSWER CHOICES	RESPONS	SES
Yes, this happened in Knoxville	8.70%	4
Yes, this happened in Knox County	0.00%	0
No	89.13%	41
If yes, please explain how do you think you were discriminated/what was the basis of the housing discrimination?	2.17%	1
TOTAL		46

Q28 If you answered YES to question 27, did you file a report of that discrimination



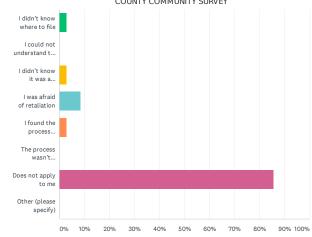
ANSWER CHOICES	RESPONSES	
Yes	0.00%	0
No	13.16%	5
Does not apply to me	86.84%	33
TOTAL		38

Q29 If you answered YES to question 27, but you did not file a report of that discrimination, why didn't you file? (Select all that apply)

Answered: 35 Skipped: 20

21/23

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE FOR CITY OF KNOXVILLE AND KNOX COUNTY COMMUNITY SURVEY



ANSWER CHOICES	RESPONSES	
I didn't know where to file	2.86%	1
I could not understand the process, wasn't in my language	0.00%	0
I didn't know it was a violation of the law	2.86%	1
I was afraid of retaliation	8.57%	3
I found the process cumbersome and didn't have the time	2.86%	1
The process wasn't accessible to me because of a disability	0.00%	0
Does not apply to me	85.71%	30
Other (please specify)	0.00%	0
Total Respondents: 35		

Q30 Please suggest any improvements that you would like to see in the city or county as it pertains to affordable and accessible housing.

Answered: 25 Skipped: 30

Q31 Additional Comments based on your renting/buying affordable and accessible housing with the city or county?

Answered: 13 Skipped: 42

STAKEHOLDER SURVEY

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE FOR CITY OF KNOXVILLE AND KNOX COUNTY COMMUNITY SURVEY

Q32 Any suggestions for the City of Knoxville to address Fair Housing issues

Answered: 16 Skipped: 39

Q33 Any suggestions for Knox County to address Fair Housing issues

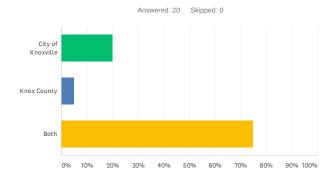
Answered: 15 Skipped: 40

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE FOR CITY OF KNOXVILLE AND KNOX COUNTY STAKEHOLDER SURVEY

Q1 If you feel comfortable, please identify the organization you are affiliated with

Answered: 15 Skipped: 5

Q2 Please select the geographic coverage of the services offered by your organization/company



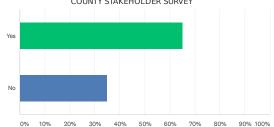
ANSWER CHOICES	RESPONSES	
City of Knoxville	20.00%	4
Knox County	5.00%	1
Both	75.00%	15
TOTAL		20

Q3 Do you feel that fair housing laws are adequately enforced in your community?

Answered: 20 Skipped: 0

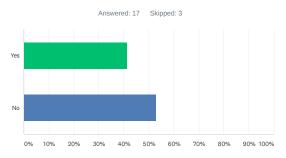
23 / 23





ANSWER CHOICES	RESPONSES	
Yes	65.00%	13
No	35.00%	7
TOTAL		20

Q4 Are there local/state statutes in place that protect groups beyond the Federal protections based on race, color, religion, gender, national origin, familial status, disability, or income level?



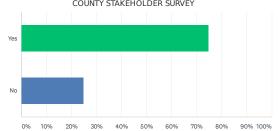
ANSWER CHOICES	RESPONSES	
Yes	41.18%	7
No	52.94%	9
TOTAL		17

Q5 Have you attended a fair housing outreach or education opportunity within the past 12 months?

Answered: 20 Skipped: 0

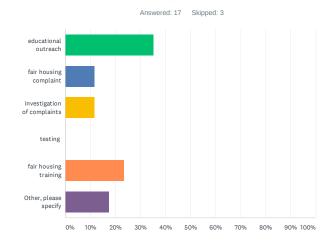
2/11

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE FOR CITY OF KNOXVILLE AND KNOX COUNTY STAKEHOLDER SURVEY



ANSWER CHOICES	RESPONSES	
Yes	75.00%	15
No	25.00%	5
TOTAL		20

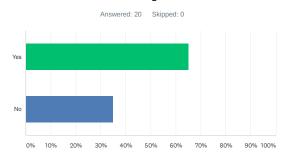
Q6 Please select all fair housing services that are available in your jurisdiction/company/organization



ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE FOR CITY OF KNOXVILLE AND KNOX COUNTY STAKEHOLDER SURVEY

ANSWER CHOICES	RESPONSES
educational outreach	35.29% 6
fair housing complaint	11.76% 2
investigation of complaints	11.76% 2
testing	0.00%
fair housing training	23.53% 4
Other, please specify	17.65% 3
TOTAL	17

Q7 Does your company or organization have written policies addressing Fair Housing Laws

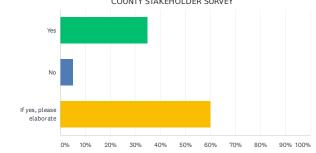


Yes 65.00% 13 No 35.00% 7 TOTAL 20	ANSWER CHOICES	RESPONSES	
NO STATE OF THE PROPERTY OF TH	Yes	65.00%	13
TOTAL 20	No	35.00%	7
	TOTAL		20

Q8 Does your company/area of jurisdiction/ organization undertake any special/affirmative marketing efforts or strategies that focus on minorities or low-income clients?

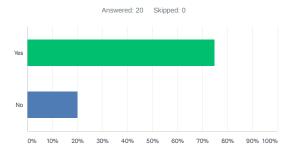
Answered: 20 Skipped: 0

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE FOR CITY OF KNOXVILLE AND KNOX COUNTY STAKEHOLDER SURVEY



ANSWER CHOICES	RESPONSES	
Yes	35.00%	7
No	5.00%	1
If yes, please elaborate	60.00%	12
TOTAL		20

Q9 With regards to access to your office, timings, office location, and outreach efforts would you say that the services provided by your company or organization are available to everyone in the city/county?

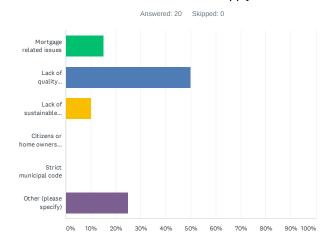


ANSWER CHOICES	RESPONSES	
Yes	75.00%	15
No	20.00%	4
TOTAL		20

4/11 5/11

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE FOR CITY OF KNOXVILLE AND KNOX COUNTY STAKEHOLDER SURVEY

Q10 What are the key issues to fair housing choice in the City or County? Pease select all that apply.



ANSWER CHOICES	RESPONSES	
Mortgage related issues	15.00%	3
Lack of quality affordable housing in desired geographical areas	50.00%	10
Lack of sustainable integrated communities that provide the amenities necessary for good quality of life	10.00%	2
Citizens or home owners can't meet financial obligations needed to sustain decent, safe and sanitary housing.	0.00%	0
Strict municipal code	0.00%	0
Other (please specify)	25.00%	5
TOTAL		20

Q11 According to you, what are the potential barriers to affordable housing in the city or county?

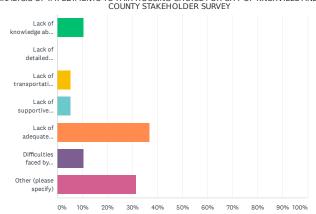
Answered: 19 Skipped: 1

6/11



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ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE FOR CITY OF KNOXVILLE AND KNOX

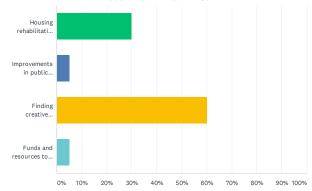


ANSWER CHOICES	RESPONSE	ES
Lack of knowledge about housing programs offered by the City and/or County	10.53%	2
Lack of detailed guidance on how affordable housing policies will be implemented	0.00%	0
Lack of transportation services to and from areas with affordable housing	5.26%	1
Lack of supportive services such as mortgage and finance	5.26%	1
Lack of adequate funding to support and maintain affordable housing	36.84%	7
Difficulties faced by private developers with leveraging resources and funds to build affordable housing	10.53%	2
Other (please specify)	31.58%	6
TOTAL		19

Q12 Select all options that can help meet disability requirements in the affordable housing sector.

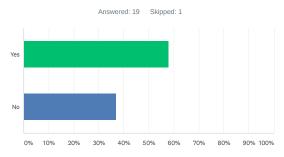
Answered: 20 Skipped: 0

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE FOR CITY OF KNOXVILLE AND KNOX COUNTY STAKEHOLDER SURVEY



ANSWER CHOICES	RESPON	SES
Housing rehabilitation for seniors and people with disability	30.00%	6
Improvements in public amenities in economically distressed neighborhoods	5.00%	1
Finding creative solutions for keeping housing costs low and rents stable in the city and county such that people can afford to live in accessible places	60.00%	12
Funds and resources to manage fair housing issues and complaints	5.00%	1
TOTAL		20

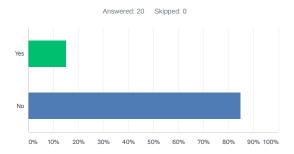
Q13 Do you perceive lack of Federal, State or local banking regulations as an impediment to fair lending practices



ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE FOR CITY OF KNOXVILLE AND KNOX COUNTY STAKEHOLDER SURVEY

ANSWER CHOICES	RESPONSES	
Yes	57.89%	11
No	36.84%	7
TOTAL		19

Q14 Are you familiar if any group or individual has filed complaints against a lending institution with any Federal, State, or local regulators, or initiated legal actions on the basis of fair housing discrimination?



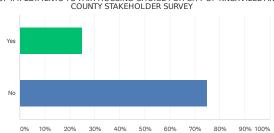
ANSWER CHOICES	RESPONSES	
Yes	15.00%	3
No	85.00%	17
TOTAL		20

Q15 Have you encountered cases where insurance companies have cancelled or increased premiums on properties that participate in Section 8 housing/vouchers/low-income housing?

Answered: 20 Skipped: 0

8/11 9/11





ANSWER CHOICES	RESPONSES	
Yes	25.00%	5
No	75.00%	15
TOTAL		20

Q16 If you could build more affordable and accessible housing which zip code would you target and why

Answered: 20 Skipped: 0

Q17 If you could build affordable housing which type of housing would you built, such as single family, townhome, apartments, one-story, or two-story etc.

Answered: 20 Skipped: 0

Q18 Please suggest potential strategies that can promote affordable and accessible housing for all

Answered: 16 Skipped: 4

Q19 To the best of your knowledge, please tell us about any programs/projects/initiatives in the last 5 years that have affected affordable housing stock and availability for the city or county. Additionally, please also tell us about any programs that help Low - Moderate Income (LMI) households gain access to affordable housing.

Answered: 18 Skipped: 2

ADVERTISEMENTS

Notice of Public Meeting PY2020-2024 Five Year Consolidated Plan

City of Knoxville Community Development Department

Tuesday, January 21, 2020, 6:00 PM at the John T. O'Connor Center 611 Winona St, Knoxville, TN 37917

The City of Knoxville's Community Development Department is seeking public input to develop its Five Year Consolidated Plan for program years (PY) 2020-2024. The plan will identify community needs and priorities, and outline how the City will spend anticipated federal funds through the U.S. Department of Housing and Urban Development (HUD)'s Community Development Block Grant, HOME Investment Partnerships (affordable housing) grants, and Emergency Solutions Grants (homeless services) programs.

At this meeting, the City of Knoxville will present a summary of information collected from its public/citizen participation and consultation process, a summary of housing needs data, and draft priority goals and strategies that will guide the types of programs that HUD funds may be used for, beginning in July 2020. The City will also share a timeline for further public participation, an outline of a process for the development of an Analysis of Impediments for Fair Housing Choice, and take comments from meeting participants.

The O'Connor Center is wheelchair accessible. If you are a person with a disability who requires an accommodation in order to attend a City of Knoxville public meeting, please contact the City of Knoxville's

ADA Coordinator, Stephanie Brewer Cook at 865-215-2034 or scook@knoxvilletn.gov no less than 72 business hours (3 business days) prior to the meeting you wish to attend.

The City of Knoxville is committed to meeting the needs of non-English speaking residents. If you have Limited English Proficiency (LEP) and want to request interpretation services, please contact the City of Knoxville's Title VI Coordinator, Tatia M. Harris at thermoxyilletn.gov or 865-215-2831, at least 48 hours (2 days) prior to the meeting.

If you are unable to attend the meeting, your feedback is still appreciated. Information presented at the meeting will be made available on January 22, at the City's website www.knoxvilletn.gov/development

Please send in your comments/questions to Linda Rust at Irust@knoxvilletn.gov, by mail at the City of Knoxville Community

Development Department, P.O. Box 1631, Knoxville, TN 37901, by fax to 865-215-2962 or by calling 865-215-2357. It is anticipated that the draft Consolidated Plan will be made available for public review and a 30-day public comment period in early April 2020.



CITY OF KNOXVILLE / KNOX COUNTY

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE (AI)

The Al is a review of impediments to fair housing choice in the public and private sector. Impediments to fair housing choice include any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin. This study is a requirement of the U.S. Department of Housing and Urban Development (HUD) for communities receiving federal funding for housing and community development.

Complete the survey online or mail in your completed survey. Printed surveys can be delivered to: Jaspuneet Kaur at Farmer Morgan, 441 Spring Street, Pikeville, TN 37367.

To access the survey online, visit:

https://www.surveymonkey.com/r/FH2WCVM (English) https://www.surveymonkey.com/r/X8R89CH (Spanish)



NOTICE OF PUBLIC HEARING COMMUNITY DEVELOPMENT BLOCK GRANT ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

City of Knoxville Housing and Neighborhood Development Department

The City of Knoxville will hold a public hearing on Thursday, April 30, 2020, at 5:30 p.m. (Eastern time) online through a webinar using Ring Central, powered by Zoom to hear public comment regarding the development of the Analysis of Impediments to Fair Housing Choice (AI) 2020.

Webinar Link: https://webinar.ringcentral.com/i/1499347208. Participants need to download either Ring Central or Zoom Meetings to be able to participate, chat or talk with the City and Farmer Morgan, the City's consultant for the Al.

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Webinar ID: 149 934 7208

International numbers available: https://webinar.ringcentral.com/teleconference

The primary purpose of this public hearing is to solicit and receive input from citizens, non-profits organizations and other interested parties regarding community development and housings needs for the five-year planning period and discussion of Analysis of Impediments (AI) to Fair Housing Choice. A draft of the Analysis of Impediments (AI) document is posted on the City's web site at www.knoxvilletn.gov/development under the Consolidated Plan section.

All Knoxville residents are invited to attend and participate in the public hearing. If you are a person with a disability who requires an accommodation in order to attend a City of Knoxville public meeting, please contact the City of Knoxville's ADA Coordinator, Stephanie Brewer Cook at 865-215-2034 or scook@knoxvilletn.gov no less than 72 business hours (3 business days) prior to the meeting you wish to attend.

The City of Knoxville is committed to meeting the needs of non-English speaking residents. If you have Limited English Proficiency (LEP) and want to request interpretation services, please contact the City of Knoxville's Title VI Coordinator, Tatia M. Harris at tharris@knoxvilletn.gov or 865-215-2831, at least 48 hours (2 days) prior to the meeting.

This public hearing initiates a public comment period, which will conclude on May 7, 2020. Citizens are also encouraged to submit comments to Linda Rust, City of Knoxville Housing and Neighborhood Development Department by email at Irust@knoxvilletn.gov or 865.215.2357 by May 7, 2020.

