

July 2020

**DRAFT**

# Analysis of Impediments to Fair Housing Choice

## City of Norman, Oklahoma



Prepared by:

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**Prepared For:**



**City of Norman, Oklahoma**

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# 1 INTRODUCTION

The Analysis of Impediments to Fair Housing Choice (AI) is required by the U.S. Department of Housing and Urban Development (HUD) communities receiving federal housing and community development funds including Community Development Block Grant (CDBG) funding. The overall goal of the AI is to review and assess impediments to fair housing within the City of Norman. According to HUD, impediments to fair housing choice are:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin that restrict housing choice or the availability of housing choices.
- Any actions, omissions, or decisions that 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 City of Norman's AI was developed in conjunction with required outreach, consultation, and coordination among various government agencies, private groups, public service agencies, City staff, and individuals. A list of participants in the AI is shown in the following Introduction section.

The primary federal resources for the City include the Community Development Block Grant (CDBG) program, the HOME Investment Partnerships Program (HOME), the Emergency Solutions Grant (ESG) Program, and the Continuum of Care (CoC) Program through the U.S. Department of Housing and Urban Development (HUD). The funding for the City of Norman for Fiscal Year 2019 includes \$850,844 of CDBG funds, \$374,974 of HOME funds, \$168,935 of ESG award, and \$426,422 of CoC funds. There is also HUD funding of approximately \$7.1 million for the Norman Housing Authority. The AI consists of seven chapters, including:

1. Introduction
2. Purpose and Need for the Study
3. Demographic and Housing Condition Analysis
4. Records of Housing Discrimination
5. Review of Public Sector Policies
6. Review of Private Sector Practices, and
7. Impediments to Fair Housing Choice

Though several of the impediments identified in this report are beyond the direct control of the City of Norman, the City bears responsibility for identifying these issues and developing strategies to ensure that its housing market is as open and inclusive as possible. The impediments to fair housing choice identified in this report include the following, explained in detail in Section 7.

- Demand Exceeds Supply for Section 8 Voucher Program,
- Limited Capacity to Increase Supply of Affordable Housing,
- Concentration of Minority Populations In Lower Income Areas with Limited Access to Resources and Opportunities,
- Limited Access to Resources And Opportunities In Publicly Supported Housing Neighborhoods,
- Housing Condition Problems In Some Neighborhoods,

- Lending Policies and Practices,
- Shortage of Affordable Homeownership Housing,
- Shortage of Affordable Rental Housing,
- Rising Home Values In Some Target Neighborhoods,
- Limited Supply of Housing for Persons with Disabilities, and
- Increase Fair Housing Education and Encourage Real Estate Sales and Property Management Companies to Include Fair Housing Language In Real Estate Listings.

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## 2 PURPOSE AND NEED FOR THE STUDY

Title VIII of the Civil Rights Act of 1968 (and subsequent amendment in 1988) mandates that it is unlawful to discriminate in the sale, rental, or financing of housing or, in the provision of brokerage services or facilities in connection with the sale or rental of housing, based on:

- Race,
- Color,
- Religion,
- National origin,
- Sex,
- Families with children, and
- Persons with disabilities.

The U.S. Department of Housing and Urban Development (HUD) requires that all recipients of federal funds under the Community Development Block (CDBG), HOME Investment Partnership (HOME), Emergency Shelter Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) programs take actions to affirmatively further fair housing. This obligation includes conducting an analysis to identify impediments to fair housing choice within the jurisdiction. The City of Norman receives CDBG, HOME, and ESG funding annually as a HUD Entitlement Community, and therefore is required to update its Analysis of Impediments to Fair Housing Choice (AI).

The City's previous AI was prepared in July 2015. The purpose of this study is to update the 2015 Analysis of Impediments (AI) in accordance with HUD regulations under 24 CFR 570.904(c)(1) for Entitlement Community grantees of the U.S. Department of Housing and Urban Development. The City is committed to furthering fair housing within Norman.

### A. PREPARATION OF THE ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

The City of Norman principally administers its housing and community development programs through the Department of Planning and Community Development. The Department coordinates all Consolidated Planning initiatives of the City, including plan preparation with citizen participation and community collaboration. It is also the lead agency for the update of the Analysis of Impediments to Fair Housing Choice. The AI was prepared by RKG Associates, Inc., a planning, economic and real estate consulting firm working on behalf of the City of Norman.

### B. PARTICIPANTS IN THE ANALYSIS OF IMPEDIMENTS

The City of Norman Analysis of Impediments to Fair Housing Choice included input from city officials and key persons involved in housing and community development industry, and fair housing. In conducting the AI, the consultant collaborated with individuals and organizations that represent the interests of protected groups. Participants included:

- Department of Planning and Community Development,
- Aging Services, Inc.
- Cleveland County Habitat for Humanity
- Metropolitan Fair Housing Council of Oklahoma, Inc.
- Norman/Cleveland County Continuum of Care
- Central Oklahoma Community Action Agency
- Oklahoma Housing Finance Agency
- Neighborhood Housing Services Oklahoma
- Norman Housing Authority, and
- U.S. Department of HUD Fort Worth Region IV Office.

### **C. METHODOLOGY**

This analysis has included a combination of quantitative and qualitative research. RKG Associates obtained the quantitative data from The Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T) developed by the Department of Housing and Urban Development (HUD), 2018 American Community Survey 5-Year Estimates (conducted by the U.S. Bureau of the Census), the 2010 Census, Decennial Census, ESRI, an international supplier of geographic information system software and data, the Home Mortgage Disclosure Act, and relevant reports published by various local agencies. The qualitative component includes interviews with agency staff and others involved in the provision of fair housing and/or related services in the Norman area.

# 3 DEMOGRAPHIC AND HOUSING ANALYSIS

## A. INTRODUCTION

This section examines the existing demographic and housing characteristics of the City of Norman, Oklahoma by census tract and on the city level. It uses the categories, indexes, and data from the Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T) developed by the Department of Housing and Urban Development (HUD). Affirmatively Furthering Fair Housing (AFFH) is a legal requirement that federal grantees further the purposes of the Fair Housing Act, and the AFFH Data and Mapping Tool provides a system for HUD grant recipients to assess their efforts and challenges they have in such compliance.

The following analysis provides an overview and insights into seventeen demographic and housing topics included in the latest AFFH-T raw data. The latest data version that the RKG team used is Version AFFHT0004a - February 2018. Also, the analysts complement the study with population, racial and ethnic composition, household, and household income data and projections of 2010, 2019 and 2024 obtained from ESRI, an international supplier of geographic information system software and data, as well as the 2010 Census and Decennial Census.

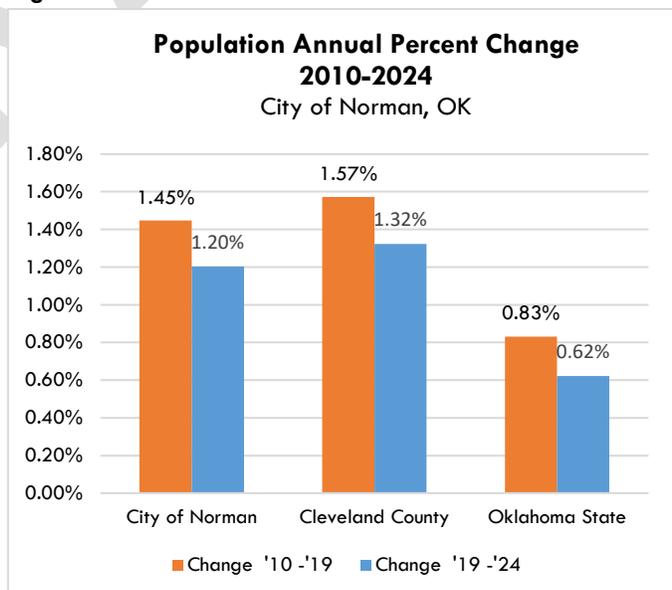
## B. POPULATION, HOUSEHOLDS, AND HOUSEHOLD INCOME TRENDS

### 1. Population Trends

The City of Norman's population was estimated at 125,369 people in 2019, which accounted for 42.9% of the County's population of 291,931. The City has slightly decreased its share of the County's population since 2010 and is projected to further reduce its share to 42.7% in 2024. This indicates that other smaller population centers outside the city are growing as a larger share of the population.

Like Cleveland County, the City experienced population growth at a pace faster than the State of Oklahoma between 2010 and 2019. Also, it is projected to remain so between 2019 and 2024. The city-level annual population growth rate of 1.45% since 2010 is slightly below the County level (1.57%), and the difference is projected to continue between 2019 and 2024 (1.20% compared to 1.32%) (Table 3-

Figure 3-1



Source: ESRI and RKG Associates, Inc., 2020

1, Figure 3-1).

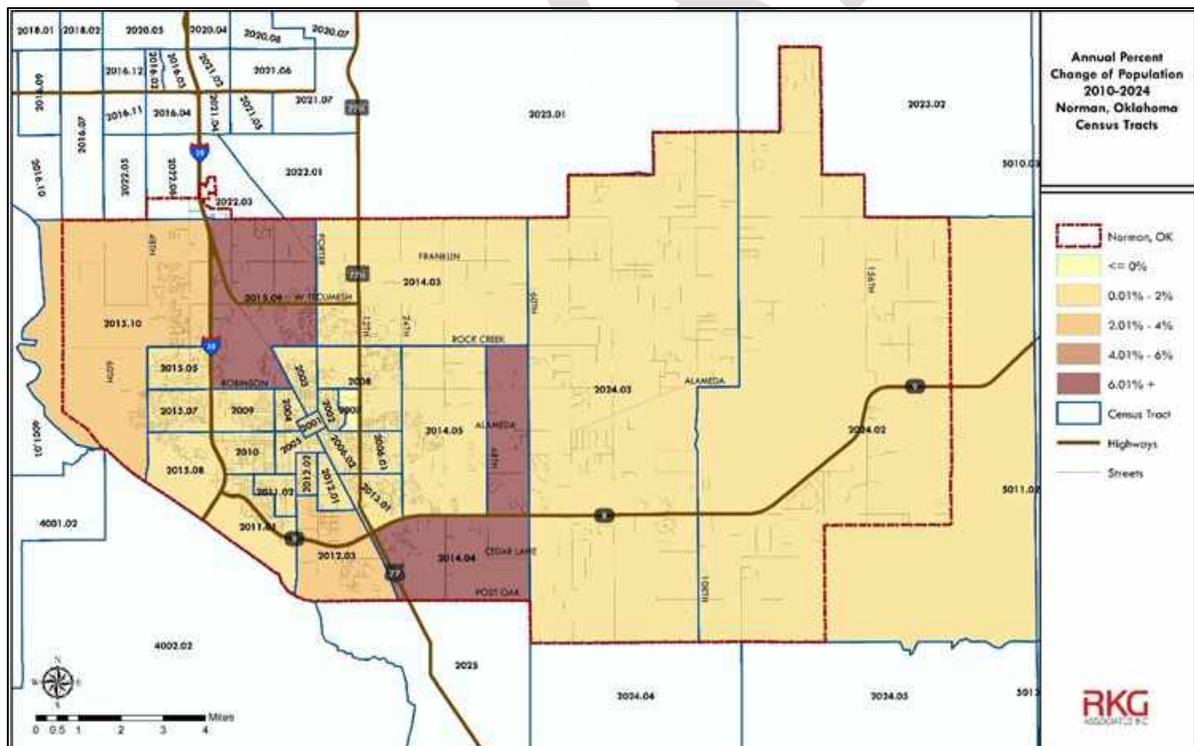
Almost all of the 27 census tracts within the City of Norman experienced population increases between 2010 and 2019, and similar gains are projected to continue through 2024 except for Census Tract 2007. This Census Tract has the smallest population of 271 people in 2019, the majority of whom are living in group quarters in the Griffin Memorial Hospital. Census tracts that are projected to see faster population growth between 2010 and 2024 are on the outer edges of Norman's urban area along the I-35 business and commercial corridor and along Highway 9 (Map 3-1). In particular, Census Tracts 2015.09 where business/industrial, institutional, and R&D/tech employment centers cluster and 2014.04 are projected to see population gains of over 100% between 2010 and 2024. This is also the area where many new housing units were developed between 2000 and 2014 as discussed in the 2015 AI.

**Table 3-1**  
**Population Trend, 2010-2024**  
**City of Norman, Cleveland County, and State of Oklahoma**

	2010	2019	2024	Change '10 -'19		Change '19 -'24	
				Actual Chg.	Ann. % Chg.	Actual Chg.	Ann. % Chg.
<b>City of Norman</b>	110,925	125,369	132,912	14,444	1.45%	7,543	1.20%
<b>Cleveland County</b>	255,755	291,931	311,232	36,176	1.57%	19,301	1.32%
<b>Oklahoma State</b>	3,751,351	4,031,901	4,157,210	280,550	0.83%	125,309	0.62%

Source: ESRI and RKG Associates, Inc., 2020

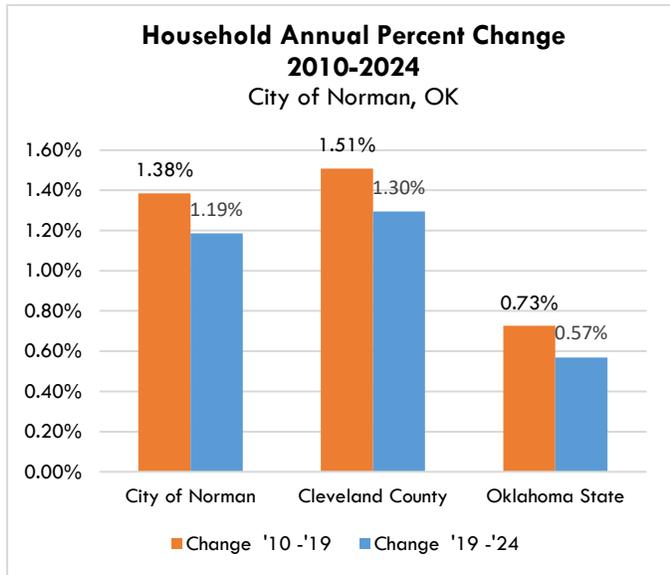
**Map 3-1**



## 2. Household Trends and Household Size

The household changes between 2010 and 2019 in the City of Norman, Cleveland County, and the State of Oklahoma all follow a trend similar to the population growth, while at slightly slower annual rates, as the average household sizes in the three areas are all increasing (Figure 3-2). The City of Norman has had a smaller household size than both the County and the State since 2010, and it is estimated to remain so through 2024. This indicates that Norman households are most likely characterized by young families without children, empty-nesters, and college students living together as roommates (Table 3-2).

Figure 3-2



Source: ESRI and RKG Associates, Inc., 2020

Table 3-2

**Household Trend, 2010-2024  
 City of Norman, Cleveland County, and State of Oklahoma**

	2010	2019	2024	Change '10 -'19		Change '19 -'24	
				Actual Chg.	Ann. % Chg.	Actual Chg.	Ann. % Chg.
<b>City of Norman</b>	44,661	50,224	53,200	5,563	1.38%	2,976	1.19%
<b>Cleveland County</b>	98,306	111,649	118,879	13,343	1.51%	7,230	1.30%
<b>Oklahoma State</b>	1,460,450	1,555,881	1,600,138	95,431	0.73%	44,257	0.57%
<b>Average Household Size</b>							
<b>City of Norman</b>	2.33	2.36	2.37	N/A	N/A	N/A	N/A
<b>Cleveland County</b>	2.49	2.52	2.53	N/A	N/A	N/A	N/A
<b>Oklahoma State</b>	2.49	2.52	2.53	N/A	N/A	N/A	N/A

Source: ESRI and RKG Associates, Inc., 2020

## 3. Median Household Income

The median household income in the City of Norman was lower than both the County and the State levels in 2010. However, it surpassed the State level in 2019 with a faster 2010-2019 annual growth rate than both the County and the State. The City's median household income is still behind the County level (\$54,773 compared to \$59,940) in 2019 and is projected to remain so through 2024 as it is estimated to grow at a slower rate of 1.70% compared to 1.96% in the County and 1.77% in the State between 2019 and 2024 (Table 3-3). The census tracts with the highest median household incomes within the City are northwest, north, and east to the center of Norman's urban area, generally matching the census tracts with the fastest population growth since 2010 and the City's major employment centers. In comparison, the City's urban core has the lowest median household income (Map 3-2). All but two census tracts are projected to experience between 0% and 4% annual increase in the median household income between 2019 and 2024, with Census Tracts 2015.09, 2003, 2002 and 2006.01 estimated to see the fastest annual growth of their median household incomes at a rate

of over 3% per year. These census tracts, especially Census Tract 2015.09, generally align with the City's major business/industrial and commercial corridors along I-35 in addition to higher-paying large institutional and R&D/tech job centers such as the National Weather Service Radar Operations Center, where there have also been the fastest population gains since 2010. However, Census Tract 2012.02 which is on the Oklahoma University campus is estimated to see a slight decrease in its median household income between 2019 and 2024 (0.14% per year) (Map 3-3).

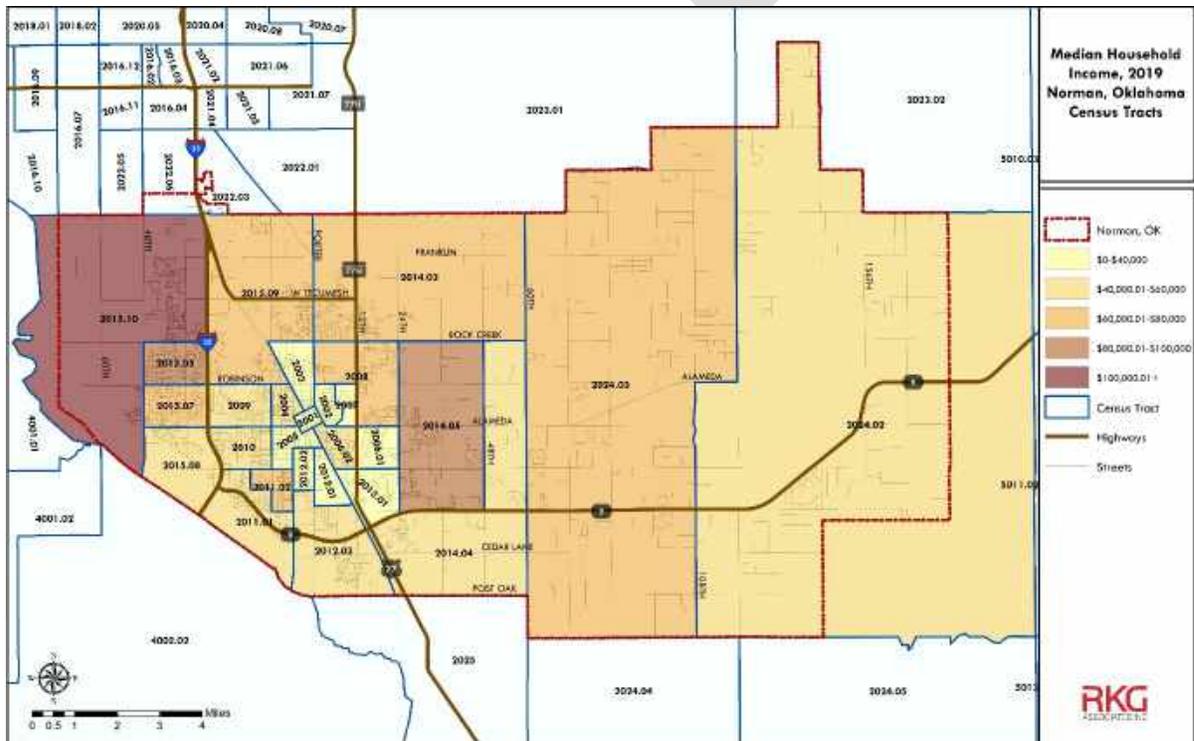
**Table 3-3**

**Median Household Income Trend, 2010-2024  
 City of Norman, Cleveland County, and State of Oklahoma**

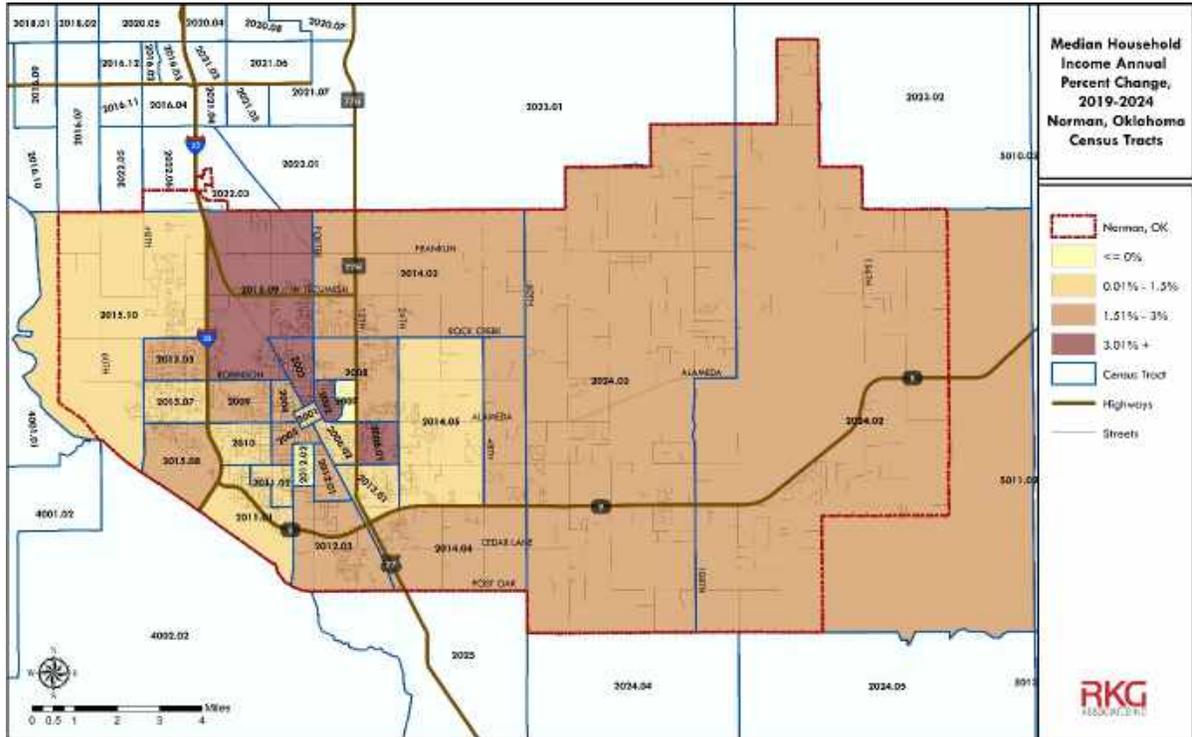
	2010	2019	2024	Change '10 -'19		Change '19 -'24	
				Actual Chg.	Ann. % Chg.	Actual Chg.	Ann. % Chg.
<b>City of Norman</b>	\$45,209	\$54,773	\$59,438	\$9,564	2.35%	\$4,665	1.70%
<b>Cleveland County</b>	\$52,688	\$59,940	\$65,826	\$7,252	1.53%	\$5,886	1.96%
<b>Oklahoma State</b>	\$50,051	\$50,697	\$55,176	\$646	0.14%	\$4,479	1.77%

Source: 2010 Census, ESRI and RKG Associates, Inc., 2020

**Map 3-2**



Map 3-3

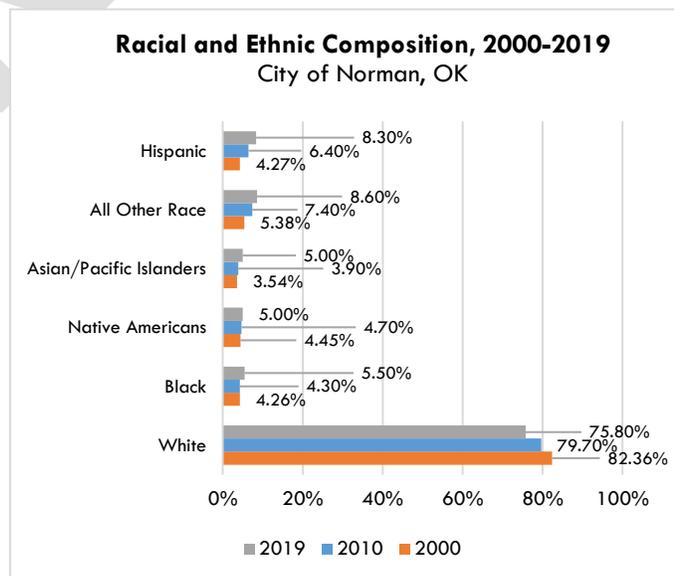


C. RACE AND ETHNICITY

1. Racial/Ethnic Trends and Composition

The City’s White population accounted for the largest share of the population in 2019, followed by people of All Other Race at 8.6%, and the Hispanic population at 8.3% (Figure 3-3). African Americans, who represent over 12% of the U.S. population, comprise less than 6% of the City’s population. It should be noted that the term “Hispanic” does not refer to a racial group. The United States Census Bureau uses the ethnonyms “Hispanic or Latino” to refer to “a person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin regardless of race” and states that Hispanics or Latinos can be of any race, any ancestry, any ethnicity.<sup>1</sup>

Figure 3-3



<sup>1</sup> Wikipedia, <https://en.wikipedia.org/wiki/Hispanic>

Source: ESRI and RKG Associates, Inc., 2020

The Native American population represented 5.0% of the City’s population in 2019, which was five times the share on the national level at 1%.

All racial and ethnic groups experienced population gains between 2000 and 2010, especially people of All Other Race and people with Hispanic ethnicity, which grew by over 5% annually. Proportionally, all Minority (Non-White) groups also saw a steady rise of their population share during this decade, while the White population share reduced from 82.4% to 79.7% due to a slower population growth compared to other minority groups.

Since 2010, people of Hispanic ethnicity have maintained strong annual population growth (5.2%). Also, the African American people and the Asian or Pacific Islander population have both experienced a faster annual growth compared to the previous decade (5.0% respectively). The remaining racial groups have seen a slower but modest population increase during the same period. Proportionally, the White population has seen a continued decrease of its population share during the most recent decade, while the share of the All Minority (Non-White) group rose further from 20.3% in 2010 to 24.1% in 2019 (Figure 3-3, Table 3-4).

**Table 3-4**  
**Racial and Ethnic Composition of Population and Trend, 2000-2019**  
**City of Norman, Oklahoma**

Persons	2000		2010		2019		Chg. '00-'10		Chg. '10-'19	
	Count	Percent	Count	Percent	Count	Percent	Actual Chg.	Ann. % Chg.	Actual Chg.	Ann. % Chg.
<b>Total</b>	<b>95,694</b>	<b>100.00%</b>	<b>110,925</b>	<b>100.00%</b>	<b>125,369</b>	<b>100.00%</b>	<b>15,231</b>	<b>1.59%</b>	<b>14,444</b>	<b>1.45%</b>
White	78,812	82.36%	88,407	79.70%	95,030	75.80%	9,595	1.22%	6,622	0.83%
Black	4,080	4.26%	4,770	4.30%	6,895	5.50%	690	1.69%	2,126	4.95%
Native Americans	4,262	4.45%	5,213	4.70%	6,268	5.00%	951	2.23%	1,055	2.25%
Asian or Pacific Islanders	3,390	3.54%	4,326	3.90%	6,268	5.00%	936	2.76%	1,942	4.99%
All Other Race	5,150	5.38%	8,208	7.40%	10,782	8.60%	3,058	5.94%	2,573	3.48%
All Minority (Non-White)	16,882	17.64%	22,518	20.30%	30,214	24.10%	5,636	3.34%	7,696	3.80%
Hispanic Ethnicity	4,084	4.27%	7,099	6.40%	10,406	8.30%	3,015	7.38%	3,306	5.17%

Source: Decennial Census, ESRI and RKG Associates, Inc., 2020

## 2. Racial/Ethnic Concentration

Federal regulations at Title 24 Housing and Urban Development Part 91.210 “Housing Market Analysis” require grantees of HUD Community Planning and Development programs to identify and describe any areas within their jurisdictions that have concentrations of racial/ethnic minorities and/or low-income families. HUD currently leaves the determination of thresholds defining “concentrations” up to each local grantee.

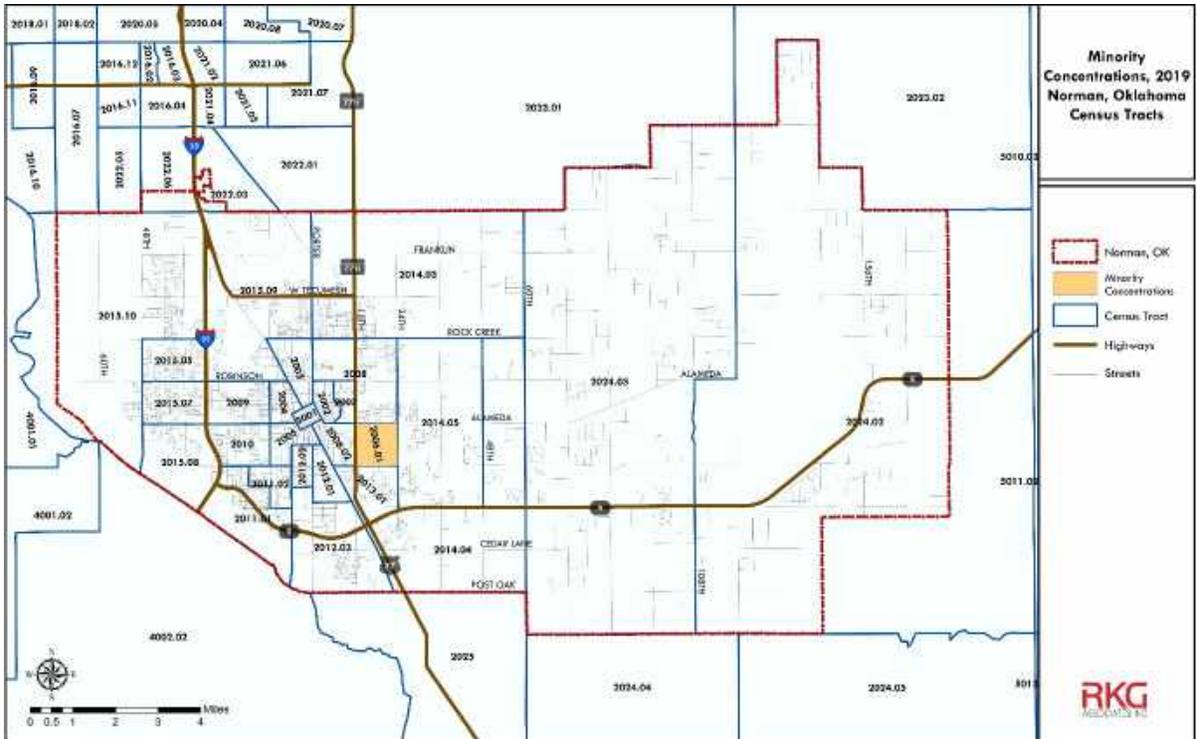
The approach currently applied by HUD’s Office of Policy Development and Research calls for an evaluation of population distribution in two primary categories: White, which includes any Census respondent who identifies as White and non-Hispanic, and minority, which includes any respondent identifying as a member of a non-White racial group or Hispanic ethnicity. Hispanic White people would be in the latter category.

RKG defined concentrations of minority populations as census tracts with non-White populations greater than 150% of the city-wide percentage of the combined minority population. For example, if the Hispanic population equaled 8.30% of the City’s population in 2019, then census tracts with Hispanic population shares of 12.5% or greater would be classified as a concentration.

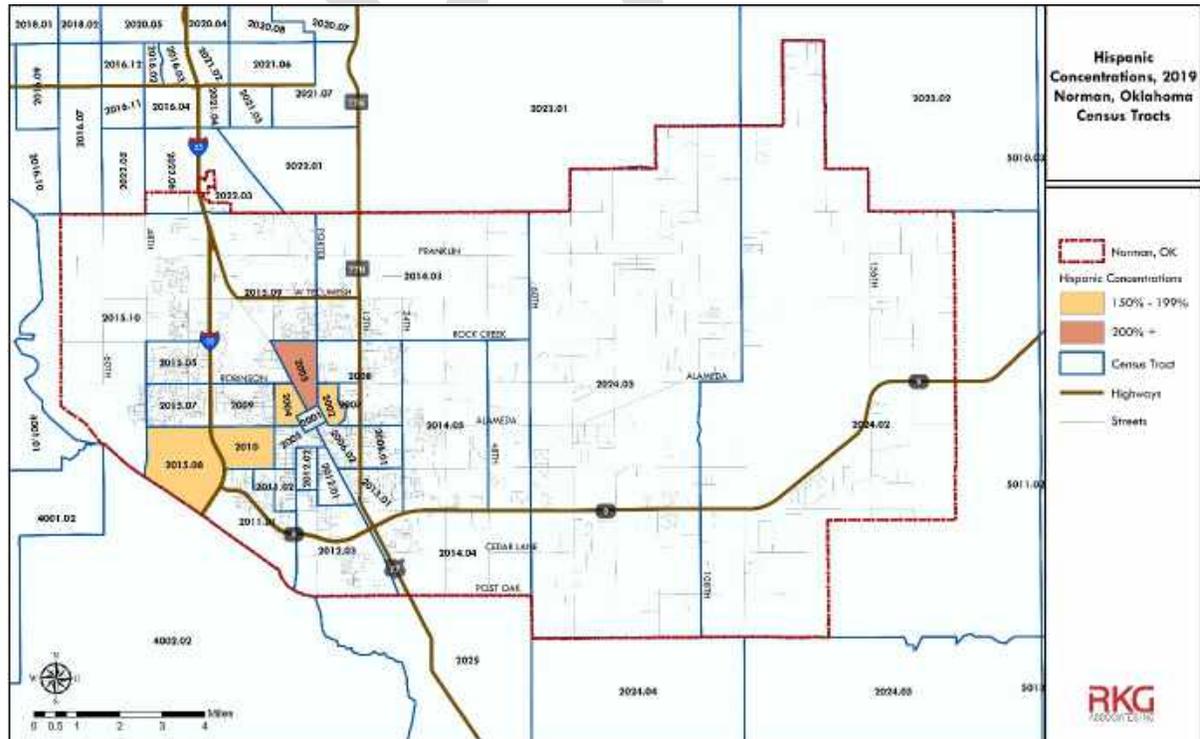
Norman has only one census tract that had a concentration of the All Minority population, and five census tracts had concentrations of the Hispanic population (using ESRI 2019 demographic data) (Map 3-4, Map 3-5). The concentrations of both the minority and the Hispanic population are generally

around the center of Norman's urban area, which has the lowest median household incomes in 2019 compared to the rest of the City.

Map 3-4



Map 3-5



## D. RACIAL/ETHNIC DISSIMILARITIES

Another factor related to the geographic distribution of racial and ethnic groups within a jurisdiction is the Racial Dissimilarity Index included in the HUD AFFH-T database. According to HUD’s definition, “the dissimilarity index represents the extent to which the distribution of any two groups (frequently racial or ethnic groups) differs across census tracts or block groups”. In other words, the Index measures how much one racial/ethnic group is spatially separated from another within a jurisdiction. The data for each racial/ethnic group is presented in comparison to the White segment of Norman’s population.

The Dissimilarity Index has values between 0 and 100, with a score of 0 representing perfect integration and a value of 100 corresponding with total segregation. A Dissimilarity Index below 40 represents low segregation, a value between 40 and 55 suggests moderate segregation, and a score above 55 indicates high segregation. The year 2010 is the most current data series from HUD.

All the Dissimilarity Index values for the City of Norman between 2000 and 2010 are below 40, indicating low segregation between racial and ethnic minority groups and the White population (Table 3-5).

**Table 3-5**

**Dissimilarity Index by Race/Ethnicity, 2000-2010  
 City of Norman, Oklahoma**

	2000	2010
Non-White/White	16.25	12.80
Black/White	28.29	22.39
Asian/Pacific Islander/White	28.80	22.95
Hispanic/White	15.05	17.66

Source: HUD AFFH Data Version AFFHT0004 and RKG Associates, Inc., 2020

## E. PLACE OF NATIONAL ORIGIN

According to the definition of the U.S. Census Bureau, the foreign-born population includes anyone who is not a U.S. citizen at birth, including those who become U.S. citizens through naturalization. Limited English Proficiency is used to refer to a person who is not fluent in the English language, often because English is not their native language. Understanding the foreign-born population and people with limited English proficiency is important for identifying the impediments to fair housing choice as well as associated solutions in the City of Norman, as these groups of the population often have more limited fair housing options, usually due to cultural and language barriers.

The year 2013 is the most current data series from HUD for the place of national origin data. According to the HUD AFFH data, the foreign-born population in the City of Norman is 7,151 in 2013, accounting for 6.5% of the total population (Table 3-6). The largest foreign-born group is the Chinese population, constituting 18% of the total foreign-born population in the City. The second-largest immigration group is the Mexican population, followed by people from Nigeria, Korea, and Cameroon. Only 2.8% of the total

**Table 3-6**

**Population by Top 5 Most Populous National Origin Groups  
 City of Norman, Oklahoma, 2013**

	Count	% of Total Population
<b>Total Foreign-Born Population</b>	<b>7,151</b>	<b>6.45%</b>
China excl. Hong Kong & Taiwan	1,283	1.20%
Mexico	890	0.83%
Nigeria	392	0.37%
Korea	381	0.36%
Cameroon	263	0.25%
All Other	3,942	3.56%

Source: HUD AFFH Data Version AFFHT0004a and RKG Associates, Inc., 2020

population in the City has limited English proficiency in 2013. Within this group, nearly 40% of them speak Spanish, followed by Chinese, Korean, Vietnamese, and Other Pacific Island languages (Table 3-7).

Between 2010 and 2013, the foreign-born population has seen a slight annual decrease of 0.5% while the population with limited English proficiency has experienced a slight growth at 0.8% annually. The shares out of the total population of these two groups also changed in opposite directions during the three years according to the HUD AFFH data (Table 3-8).

## F. DISABILITY BY TYPE AND AGE GROUP

The Americans with Disabilities Act (ADA) defines a person with a disability as “a person who has a physical or mental impairment that substantially limits one or more major life activity”. People with disabilities may face more barriers to fair housing options as they often need special physical accommodations in the housing and are more likely to experience housing discrimination.

The year 2013 is the most current data series from HUD for the disability data. The ambulatory difficulty is the most common type of disability for Norman residents, with 5.6% of people experiencing difficulty walking, followed by people with cognitive difficulty, which inflicts 5.1% of the total population. It should be noted that a person can have more than one type of disability, and therefore can be counted more than once under multiple disability categories (Figure 3-4).

Census Tract 2007 has between 37% and 51% of its population reporting four out of six types of difficulties (cognitive, ambulatory, self-care, and independent living difficulties). This is most likely because this census tract has a concentration of health institutions including hospitals and rehabilitation centers. Also, Census Tracts 2015.08, 2024.03, 2024.02, and

**Table 3-7**  
**Limited English Proficiency Persons by Top 5 Most Populous Languages**  
**City of Norman, Oklahoma, 2013**

	Count	% of Total Population
<b>Total Population with Limited English Proficiency</b>	<b>3,124</b>	<b>2.82%</b>
Spanish	1,221	1.14%
Chinese	705	0.66%
Korean	226	0.21%
Vietnamese	149	0.14%
Other Pacific Island language	113	0.11%
All Other	710	0.64%

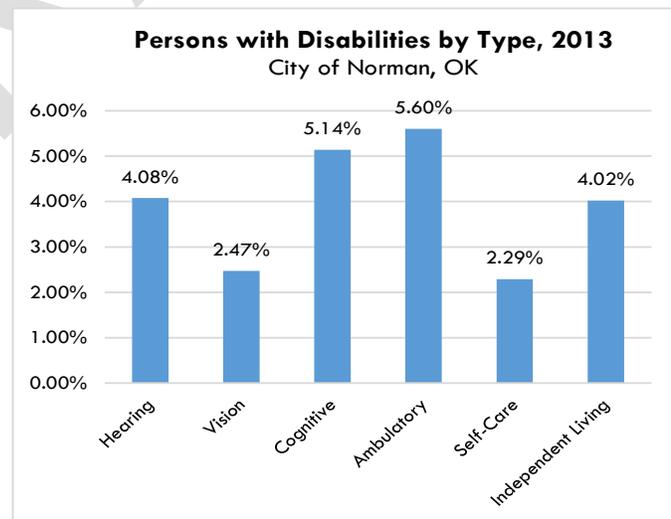
Source: HUD AFFH Data Version AFFHT0004a and RKG Associates, Inc., 2020

**Table 3-8**  
**Foreign-Born Population and Limited English Proficiency Persons**  
**City of Norman, Oklahoma, 2010-2013**

	2010	2013	Chg. '10-'13	
			Actual Chg.	Ann. % Chg.
<b>Foreign-Born Population</b>				
Number	7,262	7,151	(111)	-0.51%
Percent of Total Population	6.55%	6.45%	N/A	N/A
<b>Limited English Proficiency Persons</b>				
Number	3,050	3,124	74	0.81%
Percent of Total Population	2.75%	2.82%	N/A	N/A

Source: HUD AFFH Data Version AFFHT0004a and RKG Associates, Inc., 2020

**Figure 3-4**

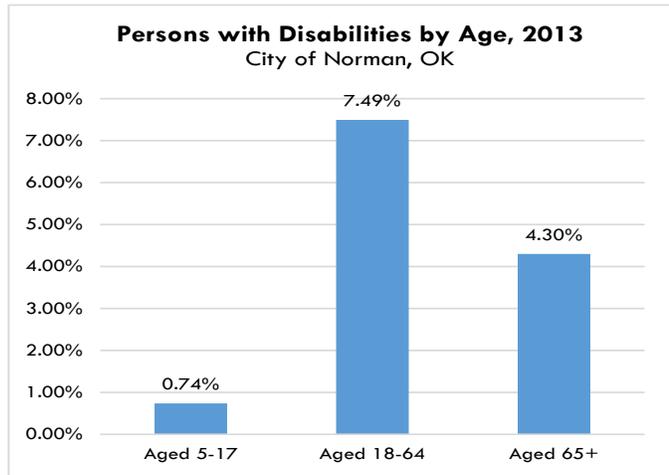


Source: HUD AFFH Data Version AFFHT0004a and RKG Associates, Inc., 2020

2006.02 have seen over 10% of their population with one or more than one type of disability (Table 3-9). This indicates that there is a geographic disparity among census tracts in terms of concentrations of persons with disabilities in Norman.

Most people with disabilities in the City of Norman are between 18 and 64 years old, according to the HUD AFFH data, accounting for 7.49% of the total population (Figure 3-5).

Figure 3-5



Source: HUD AFFH Data Version AFFHT0004a and RKG Associates, Inc., 2020

Table 3-9

Percnet of Persons with Disabilities of Total Population by Type, 2013  
 City of Norman Census Tracts, Oklahoma

	With Hearing Difficulty	With Vision Difficulty	With Cognitive Difficulty	With Ambulatory Difficulty	With Self-Care Difficulty	With Independent Living Difficulty
2001	0.00%	0.00%	0.00%	2.83%	1.21%	1.21%
2002	6.91%	5.17%	7.92%	9.27%	1.85%	6.12%
2003	5.51%	2.14%	7.01%	8.98%	3.46%	6.38%
2004	5.45%	2.45%	7.89%	6.56%	3.39%	5.28%
2005	2.41%	1.29%	4.18%	4.16%	2.01%	4.08%
2006.01	4.94%	4.90%	9.82%	6.51%	2.96%	5.63%
2006.02	7.06%	7.84%	12.98%	7.97%	6.84%	9.64%
2007	0.00%	1.95%	50.65%	42.86%	37.01%	42.21%
2008	4.87%	2.22%	3.35%	3.69%	1.20%	1.28%
2009	7.26%	4.73%	4.83%	9.19%	3.10%	4.81%
2010	4.74%	1.75%	6.67%	6.69%	1.84%	5.84%
2011.01	4.24%	1.26%	6.41%	6.24%	1.49%	3.45%
2011.02	4.02%	1.44%	1.52%	3.27%	0.94%	2.53%
2012.01	1.77%	1.61%	6.86%	0.88%	0.26%	1.04%
2012.02	0.58%	0.86%	0.77%	0.33%	0.15%	0.40%
2012.03	2.33%	1.26%	1.72%	3.38%	0.84%	1.18%
2013.01	2.12%	2.45%	4.47%	3.06%	0.87%	2.35%
2014.03	6.93%	3.44%	4.38%	6.68%	1.93%	3.46%
2014.04	3.34%	2.83%	6.58%	5.99%	2.13%	2.68%
2014.05	2.68%	1.31%	1.27%	3.23%	1.96%	3.01%
2015.05	3.86%	1.36%	2.08%	4.36%	1.56%	2.46%
2015.07	2.43%	3.16%	3.33%	4.71%	2.15%	3.00%
2015.08	9.06%	6.08%	14.87%	11.91%	6.69%	12.73%
2015.09	7.00%	1.88%	7.80%	8.52%	6.20%	5.36%
2015.1	0.79%	0.83%	1.85%	2.74%	0.95%	1.25%
2024.02	4.03%	2.26%	4.03%	10.07%	2.91%	4.75%
2024.03	7.07%	2.19%	8.86%	12.27%	5.30%	10.16%

Source: HUD AFFH Data Version AFFHT0004a and RKG Associates, Inc., 2020

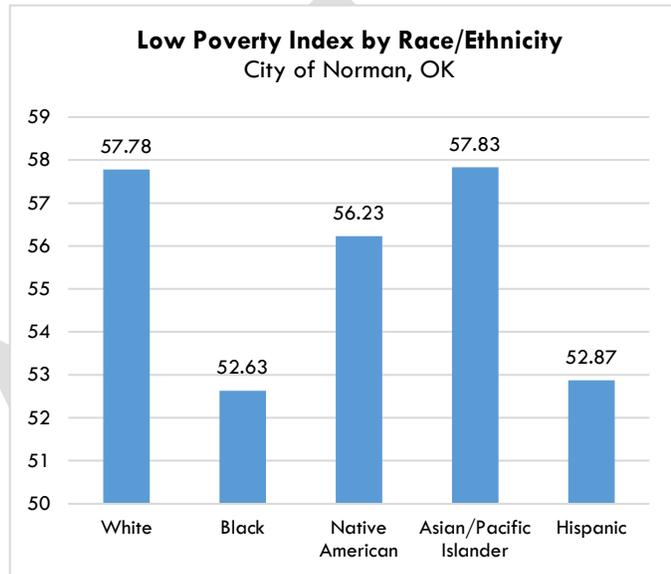
## G. POVERTY INDEX

The poverty level of the population within a jurisdiction is often associated with how easy the community can access opportunities and resources including housing. If a community is very likely to be exposed to poverty, then the residents may encounter more barriers to fair and affordable housing options, for example, not being qualified for mortgage applications due to low income levels. HUD's Low Poverty Index uses family poverty rates (based on the federal poverty line) to measure how much a community is exposed to poverty. The Low Poverty Index has scores ranging from 0 to 100, and a higher value represents less exposure to poverty in a neighborhood.

Within the City of Norman, The Asian/Pacific Islander population with the highest score of 57.83 has the least exposure to poverty, closely followed by the White population (57.78). In contrast, the Black population with a score of 52.63 has the greatest exposure to poverty compared to other racial/ethnic groups, closely followed by the Hispanic population (52.87) (Figure 3-6).

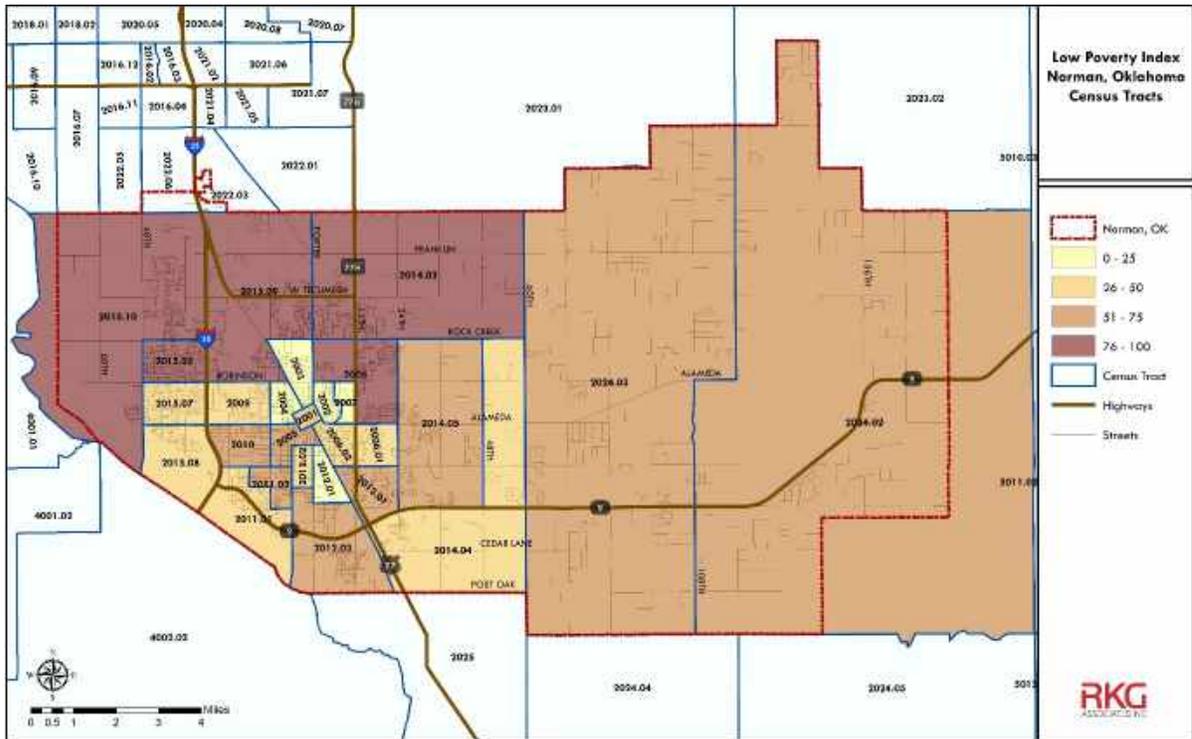
There is also a geographic disparity of poverty levels across the City. The census tracts with the lowest Low Poverty Index scores generally match the areas with concentrations of the Hispanic population compared to other census tracts within the City of Norman. This result corresponds with the conclusion that the Hispanic population in the City has the most exposure to poverty. This map also echoes the 2019 median household income map in that census tracts with low scores and thus high poverty levels generally have lower median household incomes, located around the center of the City's urban area. Besides, this map shows once again that census tracts with the lowest poverty levels are generally located on the northwestern and northern edges of the City's urban area where commercial areas and employment centers tend to cluster and a significant housing inventory increase occurred between 2000 and 2014 (Map 3-6).

Figure 3-6



Source: HUD AFFH Data Version AFFHT0004a and RKG Associates, Inc., 2020

Map 3-6

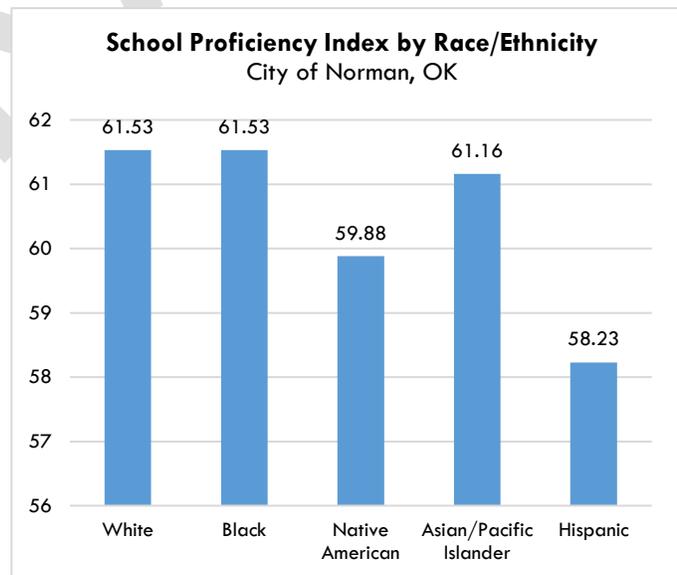


**H. SCHOOL PROFICIENCY INDEX**

School proficiency is an indicator of the quality of the education available to a given community. Higher education quality is usually associated with better access to opportunities and higher income in addition to a higher quality of life. HUD’s School Proficiency Index is based on the test scores of elementary schools within an area and measures which neighborhoods have high-performing elementary schools nearby. The values of the index range from 0 to 100 and higher scores indicate higher school system quality in a community.

Though the school proficiency index scores of the different racial/ethnic groups in Norman fall not too far apart in the medium range, a disparity of access to quality education does exist among the racial/ethnic groups (Figure 3-7). The White and Black population in the City both have the highest School

Figure 3-7

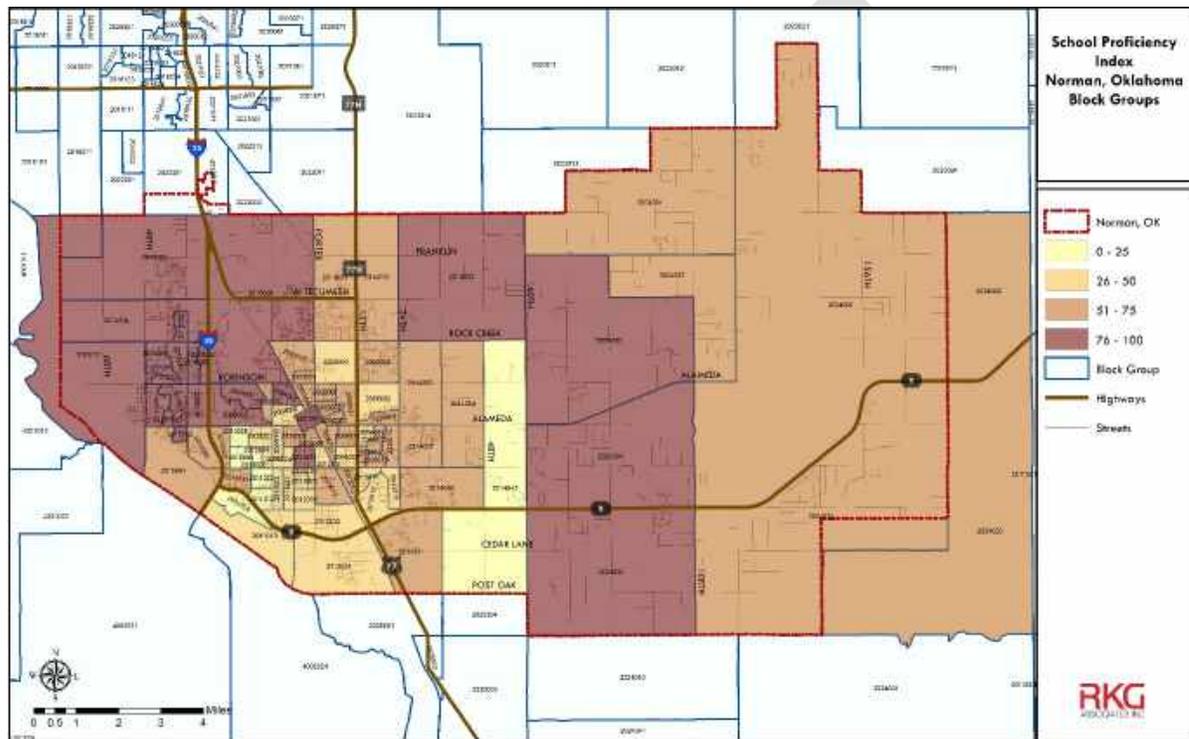


Source: HUD AFFH Data Version AFFHT0004a and RKG Associates, Inc., 2020

Proficiency Index score of 61.5, compared to the Hispanic population, which has the lowest score of 58.2. The Native American population has the second-lowest score of 59.9, indicating that this group along with the Hispanic population has comparatively much less access to high education quality.

The School Proficiency Index values were then mapped by block group in the City, with darker colors indicating higher values and thus better elementary school performances (Map 3-7). The lowest-performing census tracts in terms of school proficiency (below a value of 25) tend to be located on the east side of the intersection of Interstate 35 and Highway 9 where there are concentrations of the Hispanic population, and in a suburban-to-rural neighborhood west to the 60<sup>th</sup> Street.

**Map 3-7**



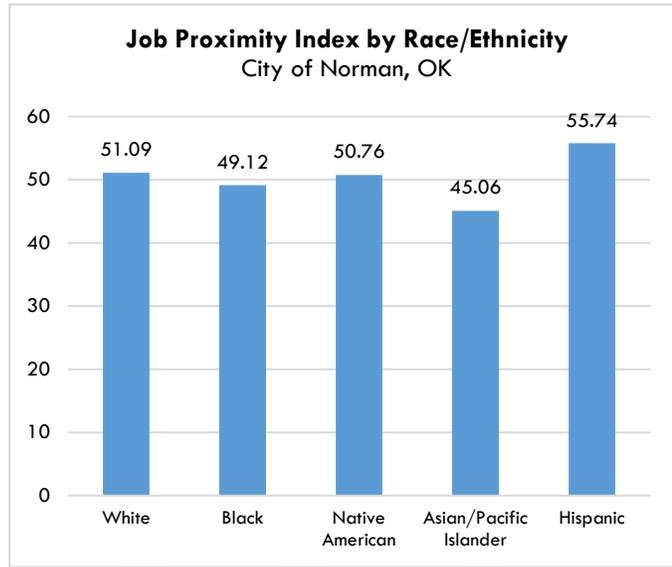
## I. JOB PROXIMITY INDEX

HUD measures a community's access to employment opportunities with the Job Proximity Index and Labor Market Engagement Index. Job Proximity Index quantifies the distance between a given block group and employment centers within a Core Based Statistical Area (CBSA). The index values range from 0 to 100, with higher scores indicating better access to job opportunities for residents in a neighborhood.

As echoed by the map of the Hispanic concentrations, the City of Norman's Hispanic population resides within the closest proximity to jobs, with the highest score of 55.7, followed by the White population, with a score of 51.1. The Asian/Pacific Islander population, in contrast, resides the furthest away from employment centers, with the lowest score of 45.1 (Figure 3-8).

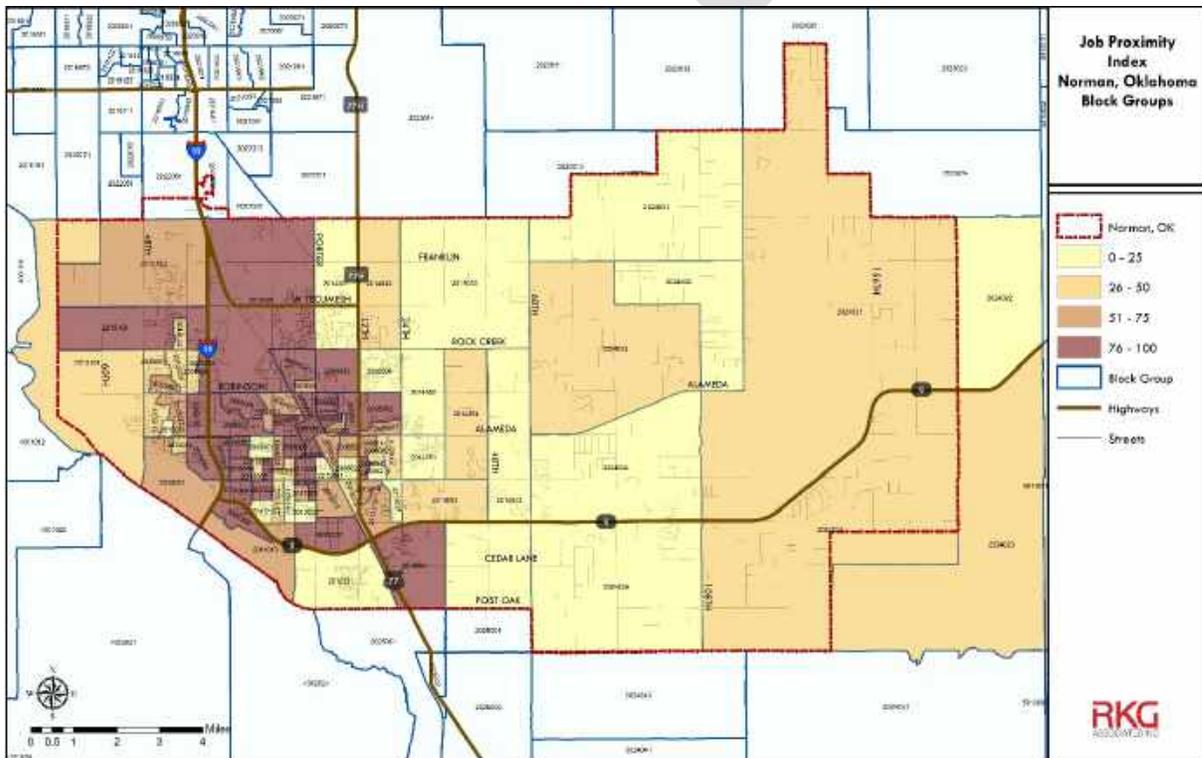
Darker colors on the Job Proximity Index Map indicate higher index values and therefore closer proximity to job opportunities. Neighborhoods along the I-35, around the center of the City's urban area, and along the western portion of Highway 9 are closer to jobs compared to the rest of the City due to the cluster of major employment centers in these areas, such as the University of Oklahoma, the Norman Regional health system, the University Town Center Shopping Mall, and the Cleveland County Health Department (Map 3-8).

Figure 3-8



Source: HUD AFFH Data Version AFFHT0004a and RKG Associates, Inc., 2020

Map 3-8



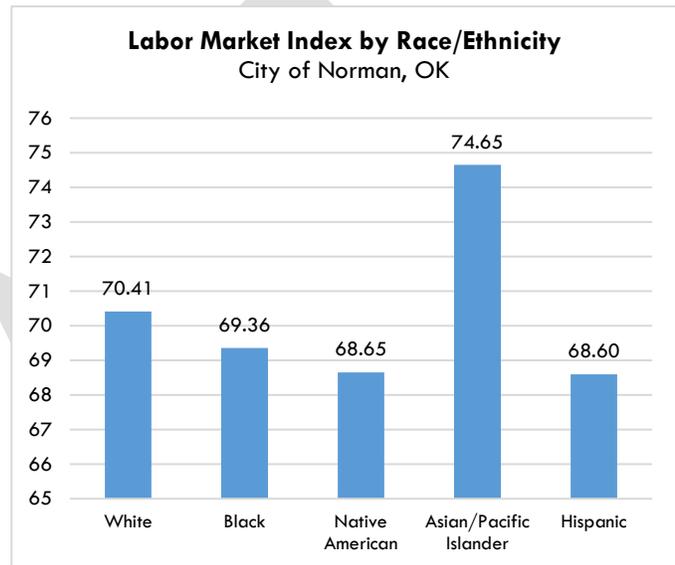
## J. LABOR MARKET ENGAGEMENT INDEX

In addition to the proximity to job centers, HUD also measures a neighborhood’s job access with the Labor Market Engagement Index, which, according to HUD’s description, “provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood.” The Index is based on the unemployment rate, labor force participation rate, and educational attainment data. This is because distance alone does not solely determine a community’s access to employment opportunities, such as the types of jobs available, and whether the education and skills these jobs require match the education attainment levels of the residents in a neighborhood. The index values range from 0 to 100, with higher scores representing higher labor force participation and human capital in the community.

Relative to the School Proficiency Index, there is a disparity among racial/ethnic groups in labor market engagement and human capital in Norman. The City’s Asian/Pacific Islander population has the highest Labor Market Engagement Index score at 74.7. This finding suggests that this racial group has the closest match between the local jobs and the people that access those jobs.

The Hispanic population which has the lowest score of 68.6 and the Native American population which has the second-lowest score of 68.7 have lower levels of engagement in the labor market and human capital compared to other groups (Figure 3-9).

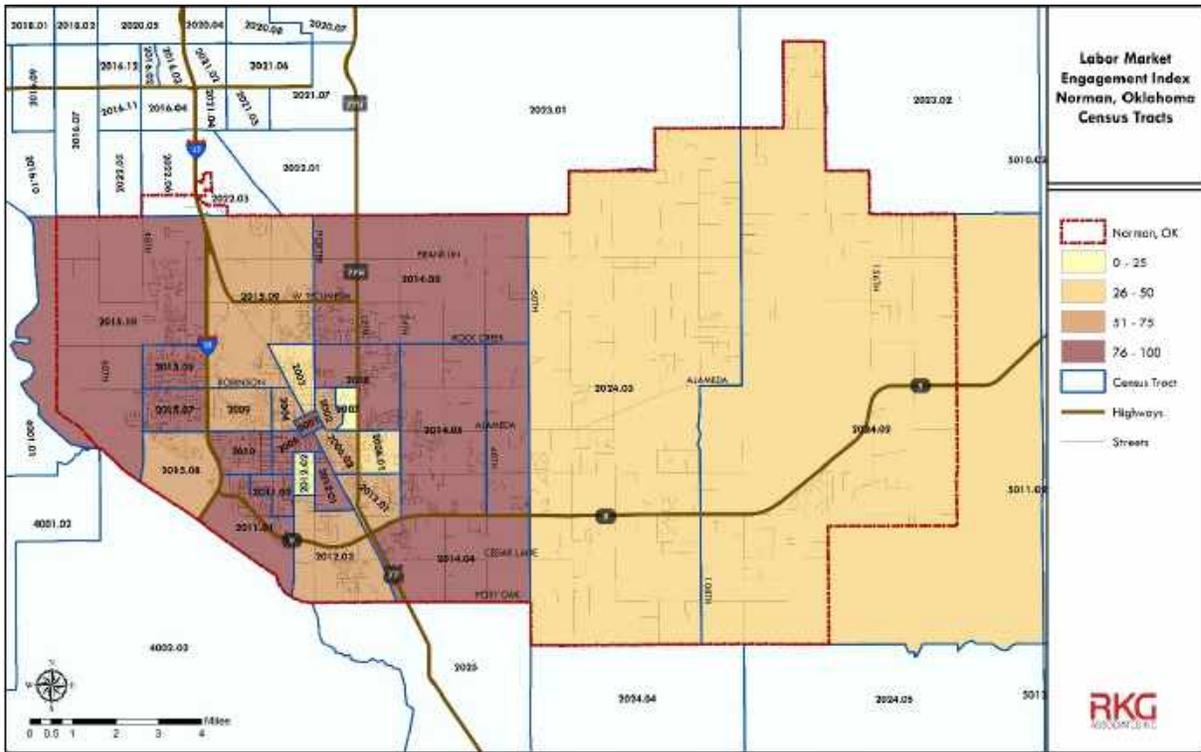
Figure 3-9



Source: HUD AFFH Data Version AFFHT0004a and RKG Associates, Inc., 2020

Labor Market Engagement Index values by census tract vary throughout the City, with darker colors indicating higher levels of labor market engagement and human capital, and therefore, better access to employment opportunities in a neighborhood. The data indicate that the greatest access to employment is achieved in the western and eastern parts of the City’s urban area, generally matching the neighborhoods that are projected to see the fastest population gains between 2010 and 2024. In comparison, the lowest access is seen in the rural areas of Norman, in addition to Census Tracts 2012.02 and 2007 where residents are largely University of Oklahoma students and people living in group quarters (shelters/rehabilitation center) who are generally not counted in the labor force (Map 3-9).

Map 3-9

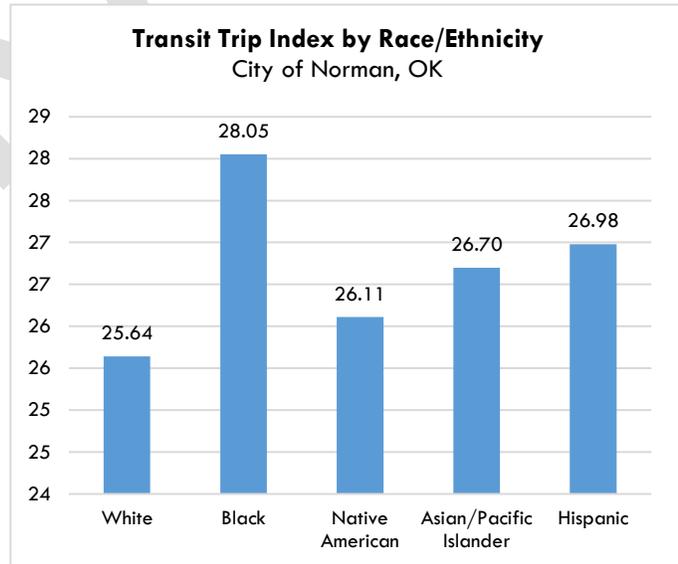


**K. TRANSIT TRIP INDEX**

A community’s access to opportunities is also influenced by the levels of mobility and availability of low-cost transportation options. This can be measured by HUD’s Transit Index and Low Transportation Cost Index. Both indices are based on the data of 3-person, single-parent families with income at 50 percent of the median income for renters in the region, with values ranging from 0 to 100. The higher the Transit Trip Index value, the more likely residents in a neighborhood utilize public transit. The Transit Trip Index controls for income such that a higher index score will often reflect better public transit access.

The Transit Trip Index scores of Norman’s racial/ethnic groups fall fairly closely into a low range, indicating that transit use is not prevalent in the City. The Black population is most likely to use public transit, with the highest score of 28.1, closely followed by the Hispanic and the Asian/Pacific Islander population, with scores of 27.0

Figure 3-10



Source: HUD AFFH Data Version AFFHT0004a and RKG Associates, Inc., 2020

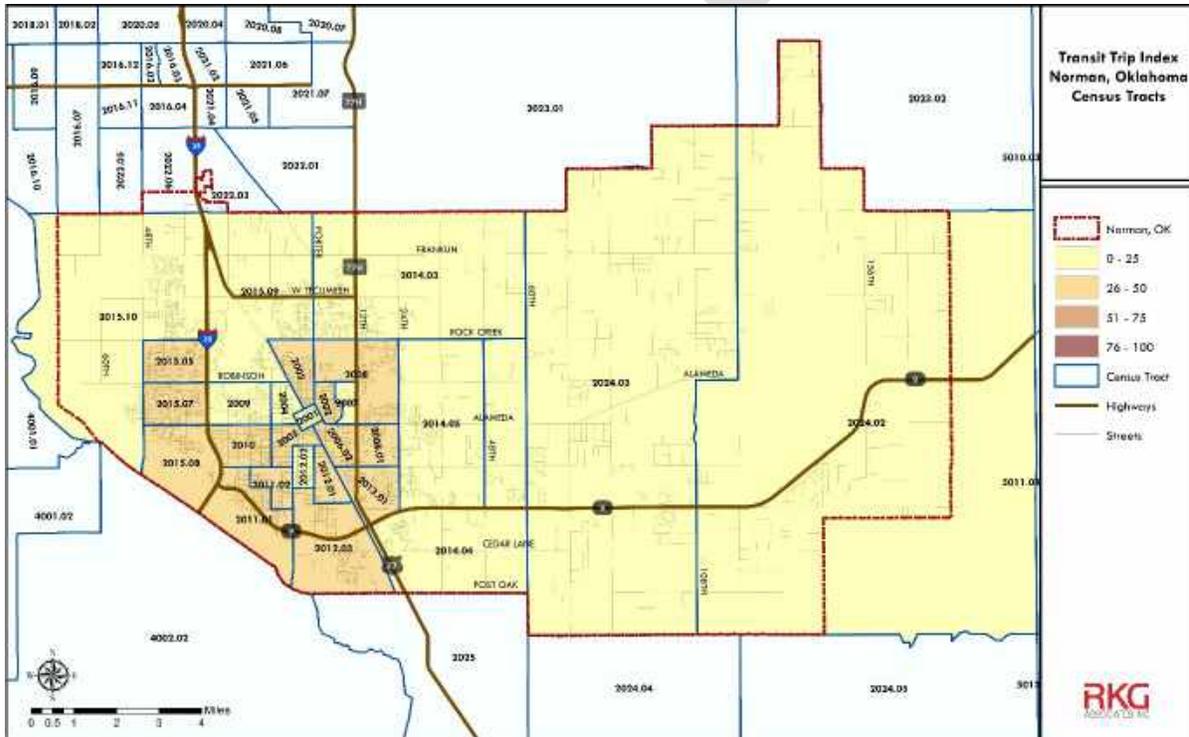
and 26.7, respectively. The White population has the lowest score of 25.6 and is least likely to use public transit compared to other racial/ethnic groups in Norman (Figure 3-10).

Though the City of Norman is served by bus services, most of the neighborhoods in the City have fairly low Transit Trip Index scores of 25 or below, indicating that the majority of the City is not very likely to use public transit. However, some neighborhoods around the urban core have higher scores between 26 and 50. It represents that residents living in these neighborhoods are a little more likely to use public transit compared to the rest of the City (Map 3-10). It is not surprising that demand for public transit is higher where the transit stops are more densely clustered.

The City of Norman absorbed the operation of the transit system from Cleveland Area Rapid Transit (CART) on July 1<sup>st</sup>, 2019, and contracted with EMBARK (the Oklahoma City transit provider) to operate the system. Most of the previous routes and services remain with some small changes. The City provides five fixed routes, two special routes, and paratransit service.

The University of Oklahoma operates its own campus routes independently and perhaps serves the greatest concentration of transit riders over a small geographic area. The major change since the 2015 Analysis of Impediments is that the transit fare structure is currently eliminated, and the City of Norman's transit service is operating fare-free until June 30, 2021, according to the City.

Map 3-10



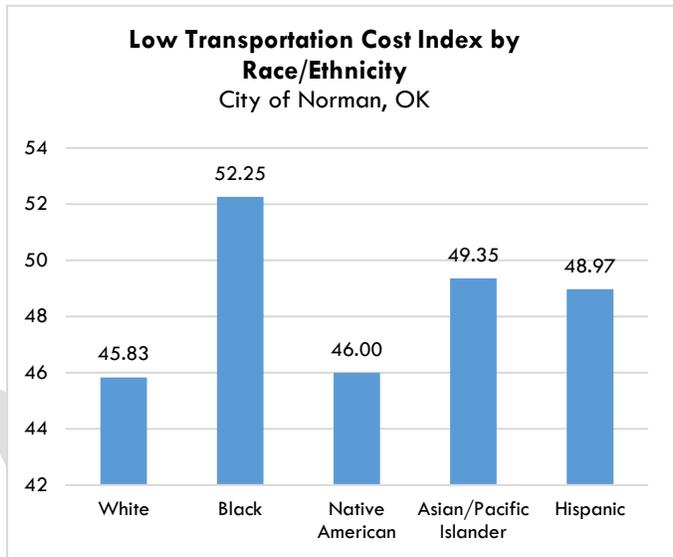
## L. LOW TRANSPORTATION COST INDEX

Another HUD indicator that evaluates the transportation opportunity access of a community is the Low Transportation Cost Index. It measures the cost of transport by neighborhood. The index values also range from 0 to 100, and the higher the index score, the lower the cost of transportation in that community. Transportation costs may be low for several reasons, including greater access to public transportation and the density of homes, services, and jobs in the neighborhood and surrounding community.

The Black population in Norman has the lowest transportation cost compared to other racial/ethnic groups, with the highest score of 52.3, followed by the Asian/Pacific Islander population with a score of 49.4. The White population has the highest transportation cost among all racial/ethnic groups, with the lowest score of 45.8 (Figure 3-11).

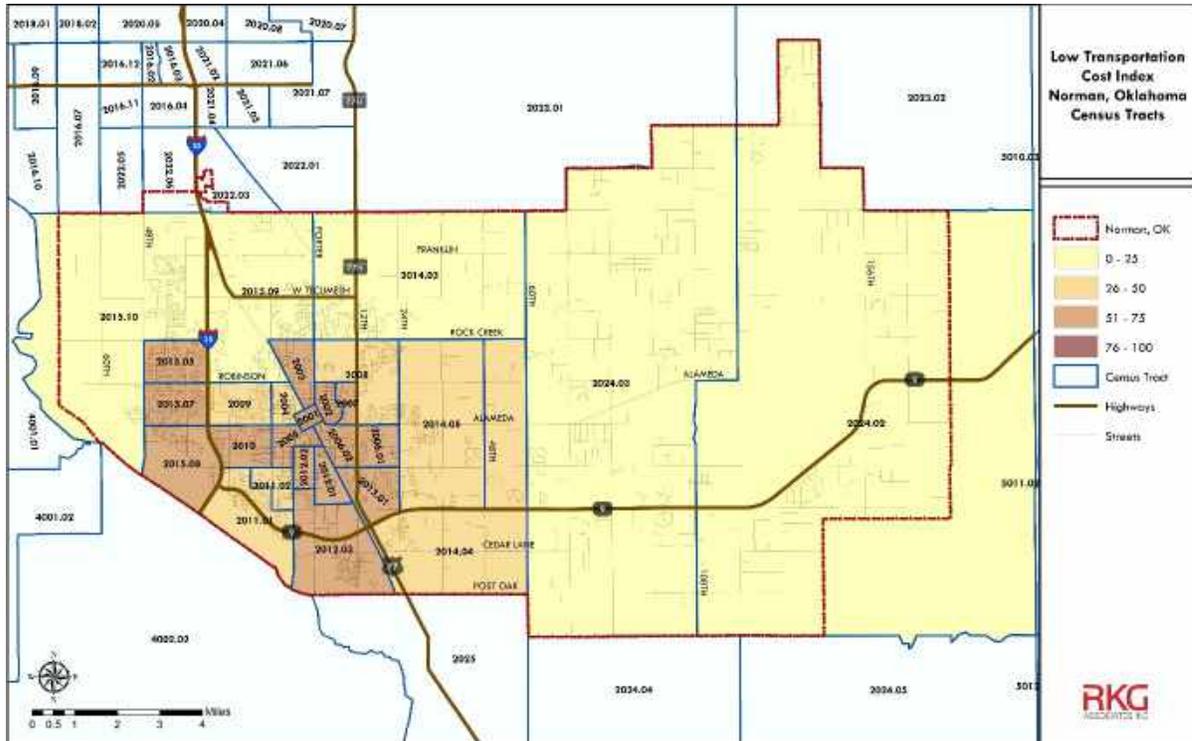
The Low Transportation Index scores exhibit a geographic difference across the City. Neighborhoods around the urban core where public transit use is higher have the highest scores and the lowest transportation costs, while the remaining neighborhoods especially those in the rural areas of the City have the highest transportation costs as most people living in those areas are car-dependent (Map 3-11).

Figure 3-11



Source: HUD AFFH Data Version AFFHT0004a and RKG Associates, Inc., 2020

Map 3-11

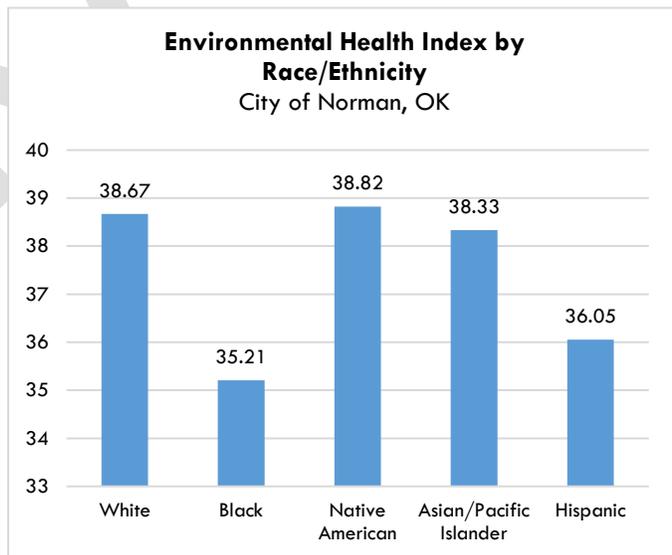


**M. ENVIRONMENTAL HEALTH INDEX**

HUD also measures the environmental quality of neighborhoods with the Environmental Health Index. The index measures the exposure to toxins harmful to human health at a neighborhood level. It is based on the U.S. Environmental Protection Agency (EPA) estimates of the air quality by neighborhood, and only measures issues related to air quality and no other factors impacting human health. The Environmental Health Index has values ranging from 0 to 100, with higher scores representing less exposure to harmful toxins, and therefore, better environmental quality of a neighborhood.

The Environmental Health Index scores of different racial/ethnic groups in Norman are fairly close ranging between 35 and 39, indicating lower-medium environmental health for all groups (Figure 3-12). The Native American population in Norman resides in neighborhoods with comparatively the best environment quality compared to other racial/ethnic groups in the City, with the highest score of 38.8. The Black population has the lowest Environmental

Figure 3-12



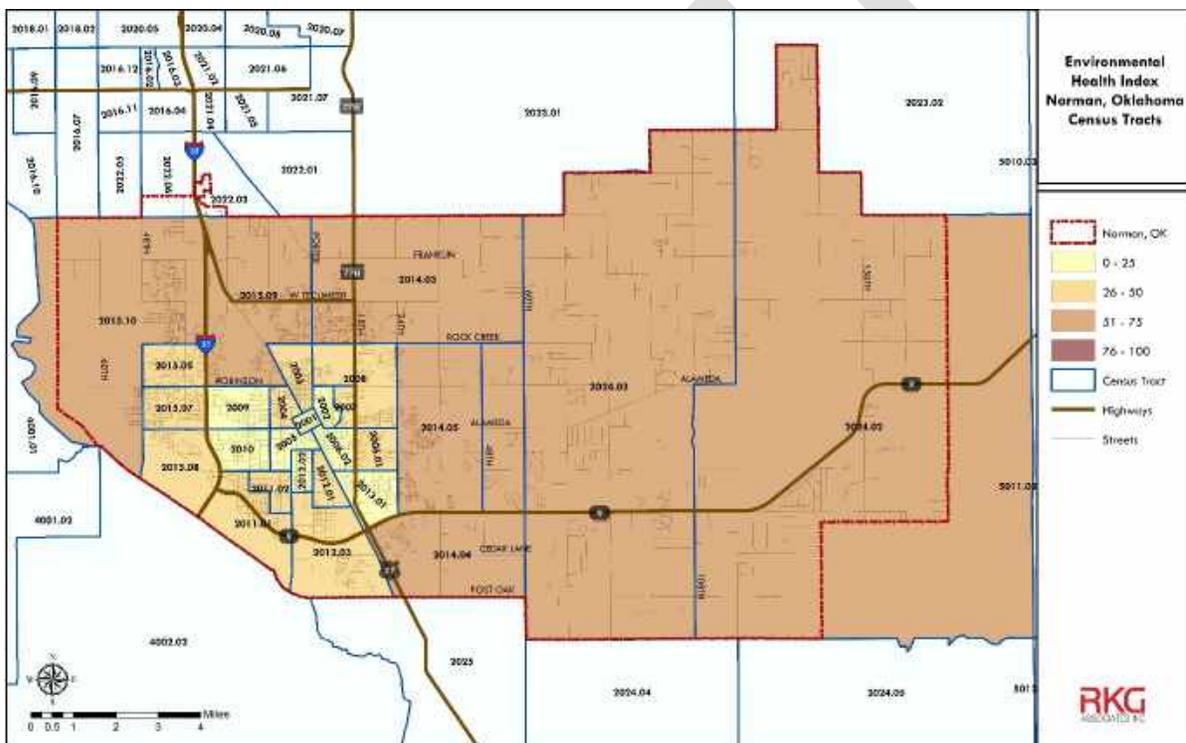
Source: HUD AFFH Data Version AFFHT0004a and RKG Associates, Inc., 2020

Health Index scores of different racial/ethnic groups in Norman are fairly close ranging between 35 and 39, indicating lower-medium environmental health for all groups (Figure 3-12). The Native American population in Norman resides in neighborhoods with comparatively the best environment quality compared to other racial/ethnic groups in the City, with the highest score of 38.8. The Black population has the lowest Environmental

Health Index score of 35.2, followed by the Hispanic population with a slightly higher score of 36.1. This indicates that these two groups usually reside in neighborhoods with more exposure to harmful toxins in the air.

The environmental health across the City varies by geography, ranging from 11 (Census Tract 2001) to 69 (Census Tract 2024.02). The pattern of the geographic difference of the Environmental Health Index in Norman is similar to some of the previous indices discussed, as the urban core with a concentration of lower-income neighborhoods has lower environmental quality. In contrast, people living in the outer edges of the urban area generally have more access to most opportunities and higher environmental quality within the City. In addition, people living in the rural areas of the City also enjoy comparatively better environmental quality. (Map 3-12). The biggest environmental factor in most communities is automobile emissions, which are highest in urban areas where there are high traffic volumes and congestions.

Map 3-12



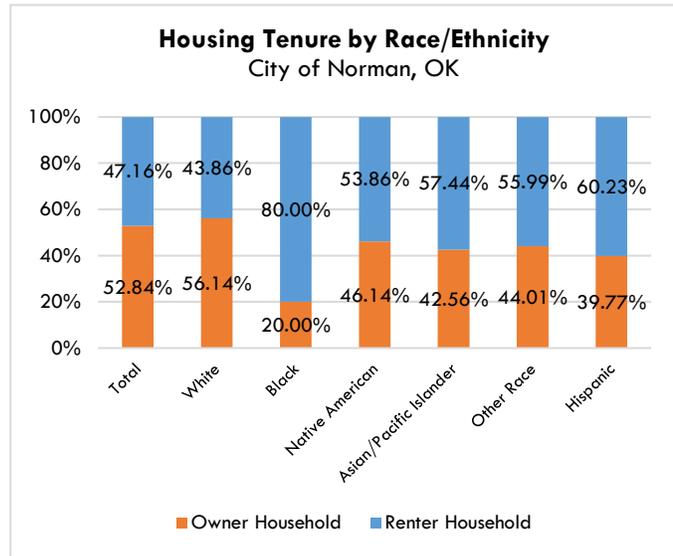
## N. HOUSING TENURE

The HUD AFFH system utilizes CHAS 2009-2013 data to analyze the housing conditions and problems in neighborhoods. The consultants also complement the analysis with housing tenure data from the 2018 American Community Survey (ACS) 5-Year Estimates. One indicator to examine the existing housing stability in the City of Norman is the homeownership rate by racial/ethnic groups. As purchasing a home is the biggest investment most people will make in their lifetime, when property values appreciate, homeowners can accumulate asset value and household wealth at the same time. Therefore, a higher homeownership rate is usually associated with more household wealth and stability. Historically, minority racial groups tend to have lower homeownership rates than white households in the U.S.

This also holds true in the City of Norman, where the White population in the City has the highest homeownership of 56.1% among all racial/ethnic groups, which is higher than the citywide average of 52.8%. In comparison, all minority groups have homeownership rates lower than the City average. In particular, the Black population has the lowest homeownership rate of 20% compared to other groups, which is over 36 percentage points lower than the rate of the White population (Figure 3-13).

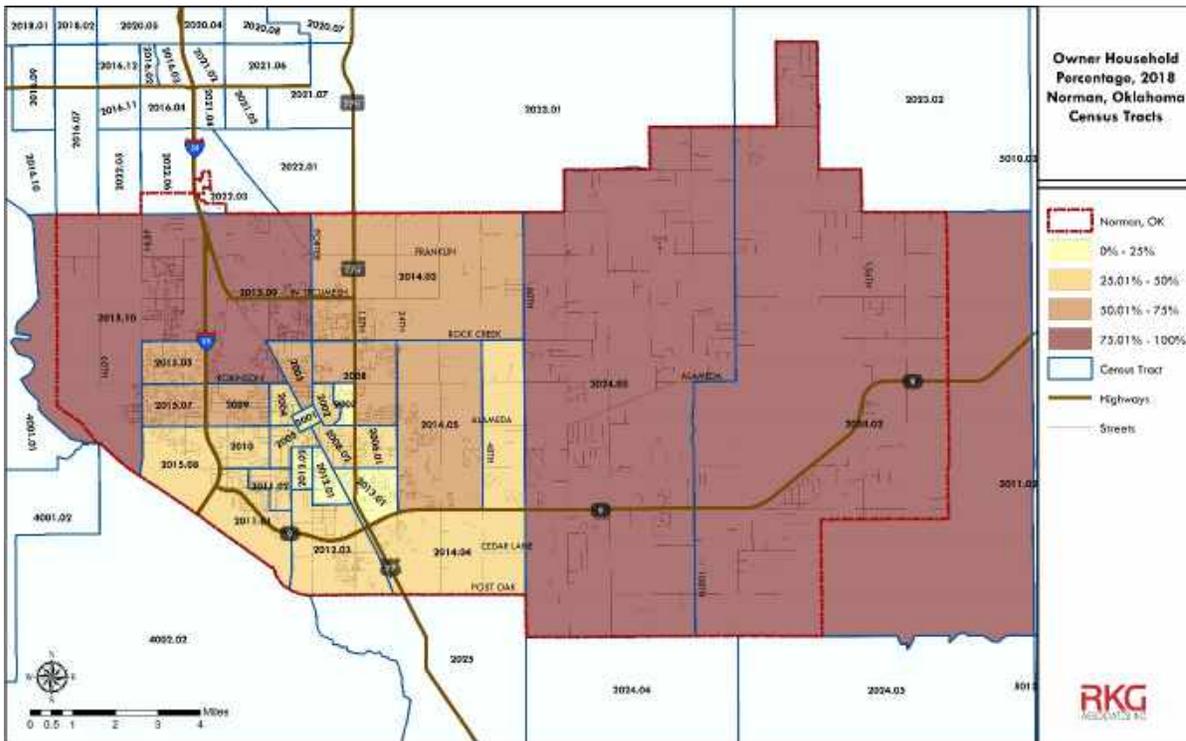
There is also a geographic disparity of homeownership rates across different neighborhoods in Norman. In general, higher-income neighborhoods on the northwest edge of the urban area and rural area neighborhoods have higher proportions of owner households, which are all over 86%. However, neighborhoods around the urban core, especially those on and around the University of Oklahoma campus have below 25% of owner households, which is the lowest compared to other parts of the City. Correspondingly, the majority of the housing stock in these neighborhoods is occupied by renter households, most likely college students. In addition, according to the 2018 ACS data, Census Tract 2007 where numerous social service organizations, healthcare facilities, and shelters are located have no ownership households. It is likely that the 2018 ACS data may not have captured the latest housing developments in this census tract, as there were mortgage originations between 2016 and 2018 in Census Tract 2007 according to the Home Mortgage Disclosure Act (HMDA) data (Map 3-13).

Figure 3-13



Source: HUD AFFH Data Version AFFHT0004a and RKG Associates, Inc., 2020

Map 3-13



**O. LOCATION OF AFFORDABLE RENTAL HOUSING**

The amount of affordable rental housing units within a city is an important indicator of the availability of fair housing choice options. According to the HUD AFFH data, among the 19,220 rental units in Norman, 37%, or 7,120 units are classified as affordable units (Table 3-10).

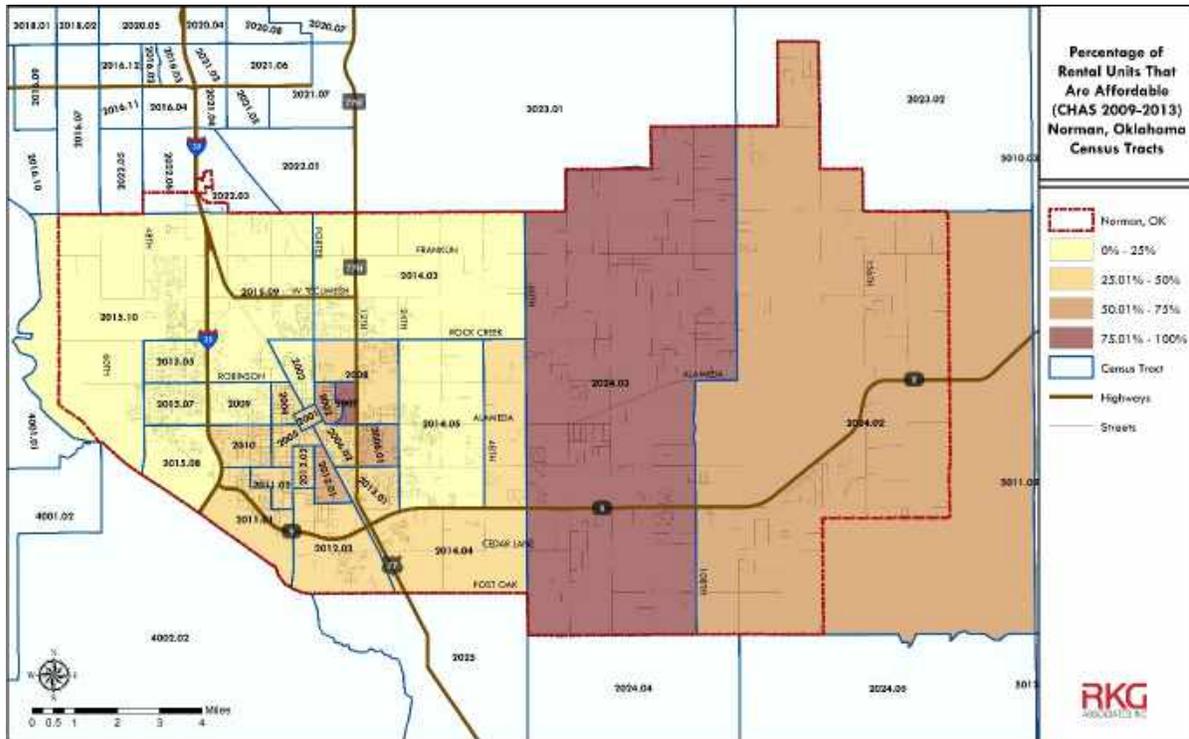
**Table 3-10**  
**Affordable Rental Units (CHAS, 2009-2013)**  
**City of Norman, Oklahoma**

	Count	Percent
<b>Total Renter Units</b>	<b>19,220</b>	<b>100.00%</b>
<b>Total Affordable Renter Units</b>	<b>7,120</b>	<b>37.04%</b>

Source: HUD AFFH Data Version AFFHT0004a and RKG Associates, Inc., 2020

Neighborhoods in and around the urban core, as well as in Norman’s rural area have over 50% of rental units that are affordable, which is the highest concentration compared to the rest of the City (Map 3-14). In comparison, neighborhoods on the northwest, the north, and the east sides of the urban area have only 19% of their rental units classified as affordable, which is the lowest in the City.

**Map 3-14**



**P. PUBLICLY SUPPORTED HOUSING AND RACE/ETHNICITY**

Norman currently has 1,299 Section 8 households using rent vouchers administered by the Norman Housing Authority (NHA). There are 100 project-based units in Section 8 properties including Vicksburg Village, 173 public housing units in five public housing properties owned and administered by NHA, and 37 Norman Affordable Housing Corporation Housing Concept units. The City also has 87 Section 202 housing units for the elderly and/or persons with disabilities, and 39 Section 811 units for persons with disabilities. In addition, Norman has 828 housing units in affordable housing tax credit projects financed by Oklahoma Housing Finance Agency (OHFA), and 28 single-family homes developed by Absentee Shawnee Tribal Housing Authority (ASHA) (Table 3-11).

The consultant also obtained the data of public housing households and Section 8 voucher participants by race/ethnicity from NHA. Currently, Rose Rock Villa is 96% occupied (87 units out of 91), and the other four public housing projects are 100% occupied. Among the 169 currently occupied units in the five public housing projects, the majority of these are occupied by White households, followed by Black households. Hispanic households account for between 3% and 7% of occupied units. Units occupied by American Indian/Alaska Native, Native Hawaiian/Other Pacific Islander, and Asian population are among the least common ones in the City’s five public housing projects. As Rose Rock Villa serves a senior population or persons with disabilities, over half (52%) of its current households are families with disabilities. Crystal Heights, Colonial Estates, and Jamestown combined also see 45% of their current households having family members with disabilities (Table 3-12).

**Table 3-11**  
**Publicly Assisted Housing Projects**  
**City of Norman, Oklahoma**

	Population Served	TOTAL	Efficiency	One Bedroom	Two Bedroom	Three Bedroom	Four Bedroom
<b>Norman Affordable Housing Corporation Housing Concept</b>							
Housing Concept Units	General	37	0	4	6	27	0
<b>Public Housing</b>							
Rose Rock Villa	Elderly/Disabled	91	0	90	1	0	0
Red Bud Village	General	38	0	6	22	10	0
Crystal Heights	General	18	0	0	12	4	2
Colonial Estates	General	16	0	0	10	6	0
Jamestown	General	10	0	3	3	3	1
<b>Section 8 New Construction</b>							
Vicksburg Village	General	100	0	24	44	32	0
<b>202 Projects for Elderly and/or Persons with Disabilities</b>							
The Willows	Elderly/Disabled	23	6	13	4	0	0
Pathways	Elderly/Disabled	6	6	0	0	0	0
Pathways	Elderly/Disabled	3	0	0	3	0	0
Pathways	Elderly/Disabled	11	0	10	1	0	0
Northcliff Gardens	Elderly/Disabled	44	0	44	0	0	0
<b>811 Projects for Persons with Disabilities</b>							
McKinzie Gardens I	Disabled	17	0	17	0	0	0
McKinzie Gardens II	Disabled	22	0	22	0	0	0
<b>Low Income Housing Tax Credit Projects</b>							
Emerald Greens	General	220	1	69	149	1	0
Senior Cottages	Elderly	80	0	20	40	20	0
Chapel Ridge	General	144	0	48	56	40	0
Villa de Vey	Elderly	92	0	42	50	0	0
Garland Square	Elderly	10	0	10	0	0	0
Garland Square	General	100	0	38	38	24	0
Wyndam Place	Elderly	54	0	54	0	0	0
Brookstone Cottages	Elderly	68	0	68	0	0	0
Bocage Senior	Elderly	60	0	30	30	0	0
<b>Absentee Shawnee Tribal Housing Authority (ASHA) Single-Family Home Projects</b>							
	American Indian						
ASHA Single-Family Homes	Tribal Member	28	0	0	1	27	0
<b>TOTAL</b>		<b>1,292</b>	<b>13</b>	<b>612</b>	<b>470</b>	<b>194</b>	<b>3</b>

Source: City of Norman and RKG Associates, Inc., 2020

**Table 3-12**  
**Public Housing Household Composition, 2020**  
**City of Norman, Oklahoma**

	Rose Rock Villa	Red Bud Village	Others (Crystal Heights, Colonial Estates & Jamestown)
<b>Total</b>	<b>87</b>	<b>38</b>	<b>44</b>
White	85%	78%	84%
Black	7%	18%	11%
American Indian/Alaska Native	1%	2%	5%
Asian	5%	2%	0%
Native Hawaiian/Other Pacific Islander	2%	0%	0%
Hispanic	4%	3%	7%
Families with Disabilities	52%	13%	45%

Source: Norman Housing Authority and RKG Associates, Inc., 2020

Among the existing 2,424 Section 8 voucher participants, the majority of them are also White (60.9%), followed Black (27.8%), Hispanic (6.9%), American Indian/Alaska Native (5.5%) and Two or More Races/All Other Race participants (5.2%). Asian and Native Hawaiian/Other Pacific Islander participants are also the least common in Norman’s Section 8 voucher program, with 10 (0.4%) and 2 (0.1%) participants, respectively. Over half (52.6%) of all the participants are the heads of households, followed by Other Youths under 18 (39.6%) and Other Adults (4.6%). Both of the Native Hawaiian/Other Pacific Islander participants are the household heads, accounting for 100%. The Asian group has seen proportionally more of their participants classified as Other Adults (20.0%) compared to other racial/ethnic groups, most likely as relatives or grandparents living with the core families. Participants of Two or More Races/All Other Race have the highest percentage of Other Youths under 18 (73.2%), followed by the Hispanic (53.3%) and Black (53.2%) participants. This is likely because participating families of these racial/ethnic groups tend to have more children. Also, over half (64.6%) of all the Section 8 voucher participants are female, almost one-third (29.9%) of all the participants are disabled, and 13.4% of them are elderly participants (Table 3-13).

**Table 3-13**  
**Section 8 Voucher Program Participant Composition, 2020**  
**City of Norman, Oklahoma**

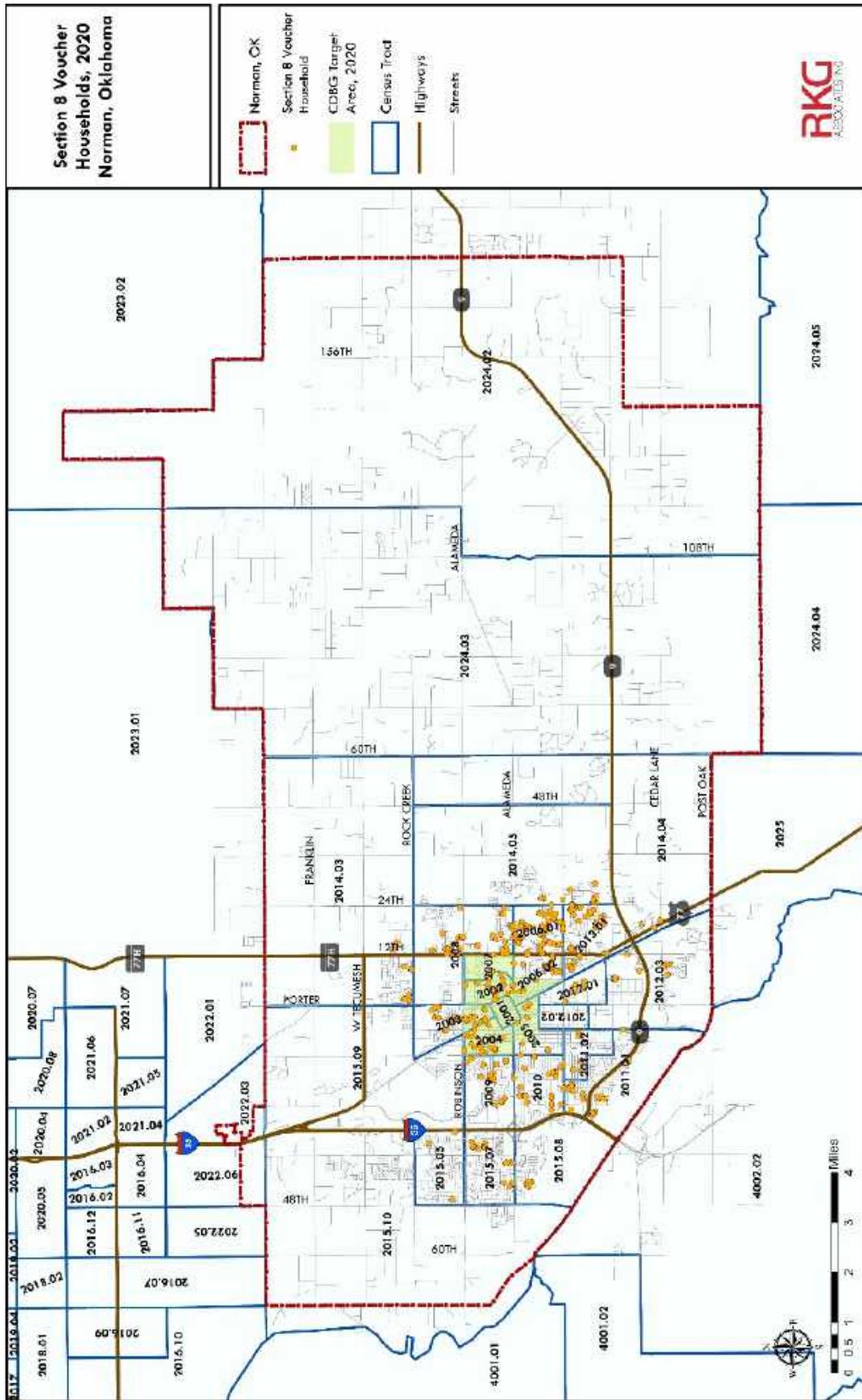
	TOTAL	Tenant Relationship						
		Household Head	Household Co-Head	Spouse	Other Adult	Full Time Student 18+	Other Youth	Live In Aide
<b>Total</b>	<b>2,424</b>	<b>1,274</b>	<b>4</b>	<b>43</b>	<b>111</b>	<b>25</b>	<b>959</b>	<b>8</b>
White	1,476	897	3	32	77	12	449	6
Black	675	280	0	9	15	11	359	1
American Indian/Alaska Native	134	66	1	0	11	1	55	0
Asian	10	5	0	0	2	0	3	0
Native Hawaiian/Other Pacific Islander	2	2	0	0	0	0	0	0
Two or More Races/All Other Race	127	24	0	2	6	1	93	1
Hispanic	167	66	0	1	9	2	89	0
Elderly	325	313	0	7	4	0	0	1
Disabled	724	647	1	15	27	1	32	1
Female	1,566	988	3	21	56	16	481	1
<b>Percentage</b>								
<b>Total</b>	<b>100.0%</b>	<b>52.6%</b>	<b>0.2%</b>	<b>1.8%</b>	<b>4.6%</b>	<b>1.0%</b>	<b>39.6%</b>	<b>0.3%</b>
White	60.9%	60.8%	0.2%	2.2%	5.2%	0.8%	30.4%	0.4%
Black	27.8%	41.5%	0.0%	1.3%	2.2%	1.6%	53.2%	0.1%
American Indian/Alaska Native	5.5%	49.3%	0.7%	0.0%	8.2%	0.7%	41.0%	0.0%
Asian	0.4%	50.0%	0.0%	0.0%	20.0%	0.0%	30.0%	0.0%
Native Hawaiian/Other Pacific Islander	0.1%	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Two or More Races/All Other Race	5.2%	18.9%	0.0%	1.6%	4.7%	0.8%	73.2%	0.8%
Hispanic	6.9%	39.5%	0.0%	0.6%	5.4%	1.2%	53.3%	0.0%
Elderly	13.4%	96.3%	0.0%	2.2%	1.2%	0.0%	0.0%	0.3%
Disabled	29.9%	89.4%	0.1%	2.1%	3.7%	0.1%	4.4%	0.1%
Female	64.6%	63.1%	0.2%	1.3%	3.6%	1.0%	30.7%	0.1%

Source: Norman Housing Authority and RKG Associates, Inc., 2020

The locations of the publicly assisted housing projects and Section 8 voucher households were then mapped (Map 3-15, Map 3-16), and the results echo the previous map in that the urban core which has a high percentage of rental units that are affordable also see a cluster of publicly assisted housing projects and Section 8 households. Note that several of the dots signifying Section 8 households represent multiple units in a single location.



Map 3-16



### Q. HOUSING PROBLEMS

Analyzing housing problems highlights areas where deferred maintenance has resulted in condition problems and eroded the housing stock. The HUD AFFH data indicates that 14,600 households have one or more housing problems, accounting for 33.1% of the total households in Norman. Proportionally, more Black (48.1%) and Hispanic (45.8%) households are experiencing greater housing problems compared to the other racial/ethnic groups in the City (Table 3-14).

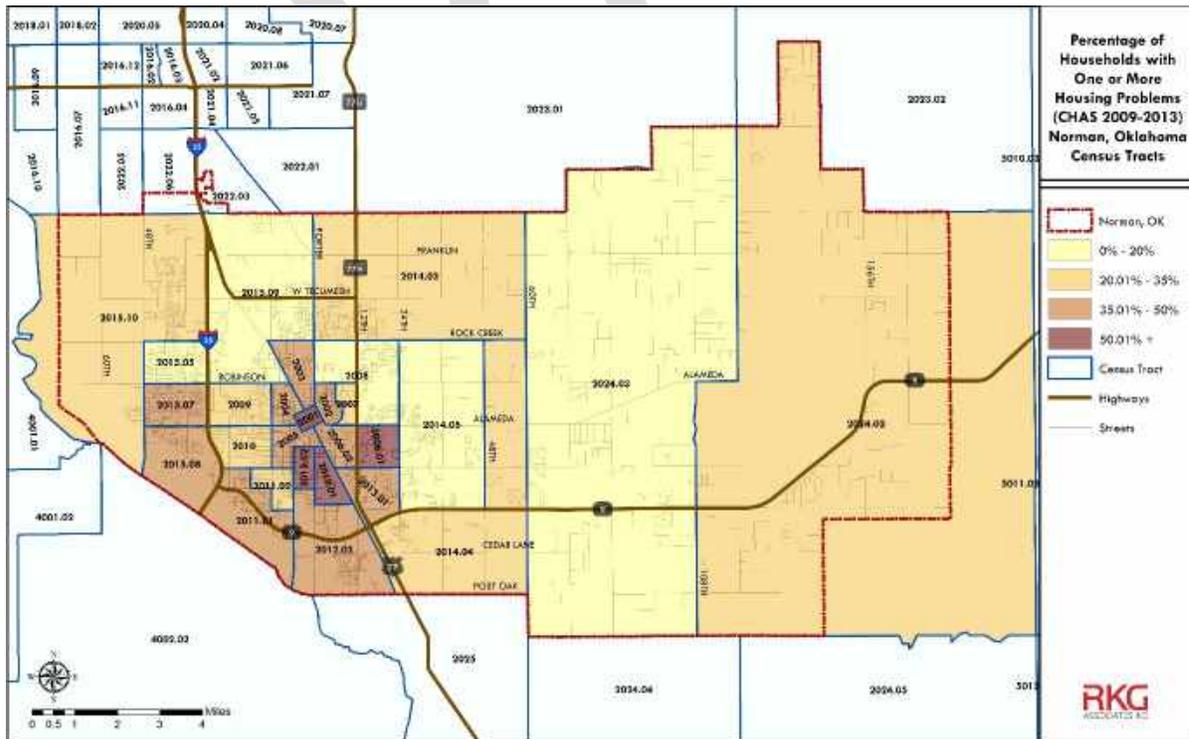
**Table 3-14**  
**Households with One or More Housing Problems**  
**City of Norman, Oklahoma (CHAS 2009-2013)**

	Total Households	Households with One or More Housing Problems	
		Count	Percent
<b>Total</b>	<b>44,068</b>	<b>14,600</b>	<b>33.13%</b>
White	36,282	11,175	30.80%
Black	1,829	880	48.09%
Native American	1,319	590	44.73%
Asian/Pacific Islander	1,398	575	41.13%
Other Race	1,504	580	38.54%
Hispanic	1,763	808	45.83%

Source: HUD AFFH Data Version AFFHT0004a and RKG Associates, Inc., 2020

The concentration of households with one or more housing problems also varies geographically. Areas with higher percentages of households experiencing one or more housing problems cluster around publicly-supported housing programs and Section 8 voucher units in Norman, with these neighborhoods seeing over 35% or even 50% of their households having housing problems. These neighborhoods also have higher exposure to poverty and lower environmental health quality, as displayed in previous maps. In addition, Census Tracts 2012.01 and 2012.02 which are on the University of Oklahoma campus with large proportions of student rental housing also have the highest percentages (over 50%) of households having housing problems, indicating that student rental housing quality is also a concern (Map 3-17). Census Tracts 2002, 2003, 2004, and 2015.08 also have concentrations of the Hispanic population, and Census Tract 2006.01 with a cluster of Section 8 households has a concentration of the minority population, as previously discussed.

**Map 3-17**



## R. COMPOSITE INDEX SCORE

In order to measure and evaluate the combined performance of all racial and ethnic groups in each census tract combining all the previously presented demographic, housing and fair housing indexes, RKG converted the value of all seven indicators into index scores that align with the HUD AFFH indexes (e.g. the Low Poverty Index) in scale and range. The seven indicators that were converted by RKG include:

### Converted Indicators

- 2019 median household income
- 2019-2024 average annual percent change of median household income
- percentage of the minority population
- percentage of people with disability
- percentage of owner-occupied housing units
- percentage of rental units that are affordable
- percentage of housing units with one or more housing problems

### HUD AFFH Indexes

- Low Poverty Index
- School Proficiency Index
- Job Proximity Index
- Labor Market Engagement Index
- Transit Trip Index
- Low Transportation Cost Index
- Environmental Health Index

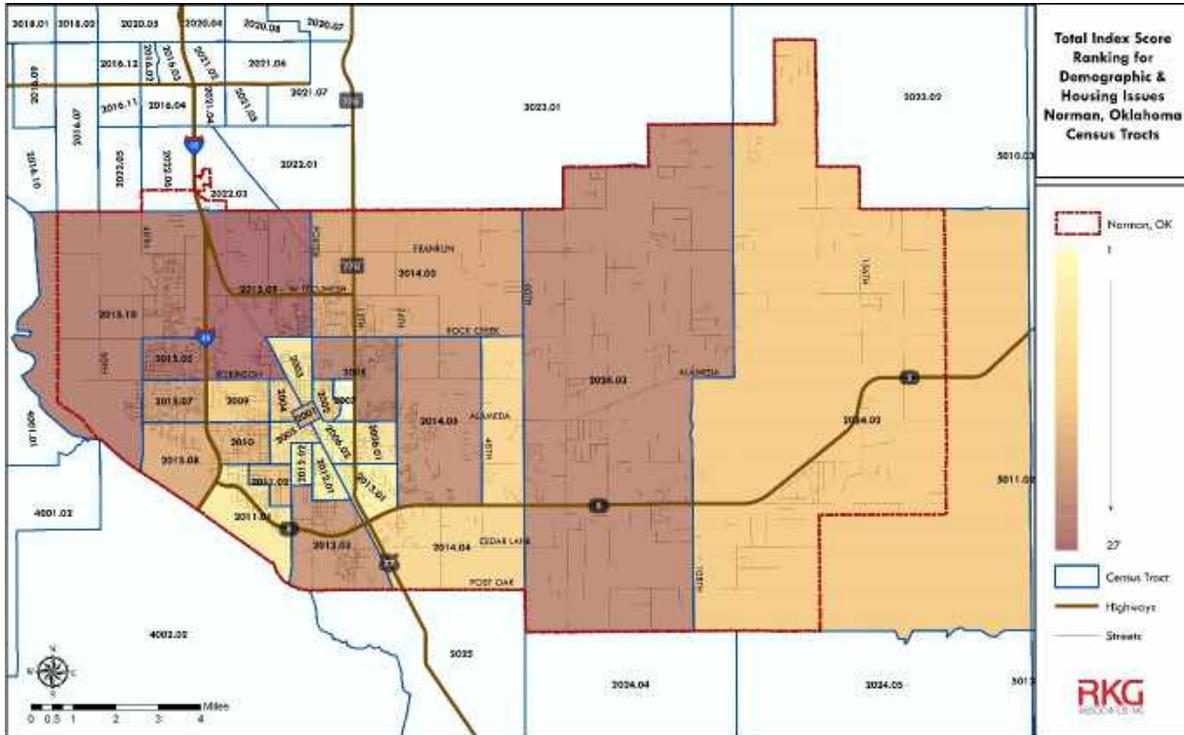
The consultant identified the highest average index values for all census tracts for each indicator and assigned it the highest index score. Then all other census tract values were converted to index scores as a percentage of the highest index value. In two instances (percentage of people with disability and percentage of housing units with one or more housing problems), the consultant assigned the highest index score to the lowest indicator value to reflect the actual meaning of the indicator. For example, the census tract with the lowest percentage of its population having a disability is considered to face fewer fair housing challenges compared to other census tracts, and this is reflected with the highest index score. As such, the higher the census tract's index score, the better its conditions were relative to the performance indicators.

The 27 census tracts were then ranked based on their total scores, and the results (the lowest total score was ranked as 1, and the highest was ranked as 27) were then mapped in ArcGIS. The darker shading reflects a higher ranking and better fair housing opportunities, while lighter shades indicate that the census tracts face more fair housing challenges (Map 3-18). Readers should note that this is not an absolute measurement of the fair housing opportunities across the neighborhoods as the index score conversion is only an approximation aiming to bring all indicators into a comparable scale based on currently available data. Rather, this analysis provides readers with insights into the geographic concentration of fair housing issues across Norman, and opportunities to start to identify neighborhoods that need additional resources to increase their fair housing availability.

The analysis indicates that the best conditions exist in census tracts on the northwestern, northern, and eastern edges of the urban area, generally north of Robinson Street and east of 24<sup>th</sup> Street. The most challenged census tract is 2007, which has the highest proportion of the vulnerable population living in assisted facilities and temporary housing such as shelters. Other challenged census tracts include those on the University of Oklahoma campus where there are high percentages of student rental housing, as

well as those in the urban core where publicly-assisted housing units and Section 8 voucher households cluster with concentrations of the Hispanic and the minority population.

**Map 3-18**



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# 4 RECORD OF HOUSING DISCRIMINATION

## A. INTRODUCTION

This section examined the records of housing discrimination complaints originated in the City of Norman to analyze the types of existing fair housing issues. The Federal Fair Housing Act (FHA) of 1968, as amended in 1974 and 1988, prohibits housing discrimination based on race, color, religion, national origin, sex, disability, and familial status. Alleged violations of the FHA may be filed with:

- Metropolitan Fair Housing Council (MFHC)
- HUD Office of Fair Housing and Equal Opportunity (FHEO)
- Office of the State Attorney General

Fair housing complaints within Norman are now under the administration of the U.S. Department of HUD, Region VI Office in Fort Worth, Texas. Therefore, RKG reached out to HUD's Fort Worth office to obtain the records of complaints filed with HUD.

## B. METROPOLITAN FAIR HOUSING COUNCIL (MFHC)

The Metropolitan Fair Housing Council of Oklahoma, Inc. (MFHC) is the only HUD-qualified full-service fair housing enforcement, advocacy and educational private non-profit organization in Oklahoma, and it has representational standing and organizational standing to file fair housing claims to HUD, Department of Justice (DOJ), and local, state and federal courts.

Since 1979, MFHC conducts fair housing counseling, investigation and testing, complaint referral to HUD, fair housing/fair lending education, outreach training, and mediation services, including legal referral by MFHC's staff attorney or a cooperating attorney. The City of Norman currently provides CDBG and HOME funds to MFHC for fair housing enforcement, fair housing education, and outreach in its jurisdictional area.

According to MFHC, they generally process an average of 850 to 900 complaint intakes per year from throughout the State of Oklahoma. Most complaints are resolved with fair housing counseling and education by MFHC staff about rights and remedies under federal and state laws. Complaints not resolved by initial or secondary counseling will be referred, if applicable, for in-house mediation, a Requests for Reasonable Accommodation or Reasonable Modification (RA/RM), further testing and investigations, complaint filing with HUD FHEO, or legal remedy by MFHC staff attorney or cooperating attorney.

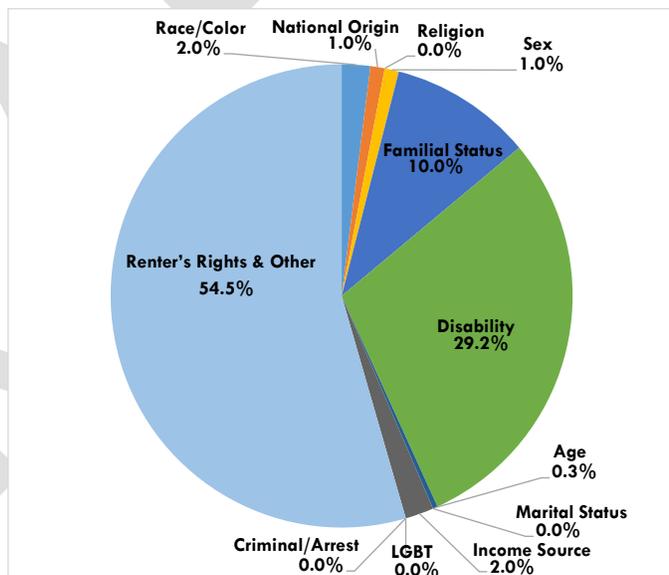
**Table 4-1**  
**Metropolitan Fair Housing Council of Oklahoma, Inc.**  
**Fair Housing Complaints, 2015-2019**  
**City of Norman, OK**

Category	2015	2016	2017	2018	2019	Total	Percent
Race or Color	1	1	1	3	0	6	2.0%
National Origin	1	1	1	0	0	3	1.0%
Religion	0	0	0	0	0	0	0.0%
Sex (Harassment/Gender/LGBT)	0	2	1	0	0	3	1.0%
Familial Status	1	6	7	8	8	30	10.0%
Disability	13	14	16	18	27	88	29.2%
Age and/or Other Issue	0	0	0	1	0	1	0.3%
Marital Status	0	0	0	0	0	0	0.0%
Income Source (Section 8, etc.)	1	1	1	2	1	6	2.0%
LGBT Issue	0	0	0	0	0	0	0.0%
Criminal/Arrest Issue	0	0	0	0	0	0	0.0%
Renters' Rights & Other	33	41	25	34	31	164	54.5%
<b>Total</b>	<b>50</b>	<b>66</b>	<b>52</b>	<b>66</b>	<b>67</b>	<b>301</b>	<b>100.0%</b>

Source: Metropolitan Fair Housing Council of Oklahoma, 2020

Records of complaint intakes received by MFHC between January 1<sup>st</sup>, 2015, and December 31<sup>st</sup>, 2019 from City of Norman indicate that among the total of 301 records, the most common issues were about “Renter’s Rights, Landlord/Tenant, and Other” issues, accounting for 54.5%. Intakes of Disability issues were the second most common, constituting 29.2%, followed by Familial Status, with a percentage of 10.0%. There were six intakes for Race or Color related issues, and six for Income Source issues, accounting for 2.0%, respectively. Three intakes were related to National Origin issues, and three were for Sexual Harassment/Gender/LGBT issues at 1.0%, respectively. One intake was related to Age and/or Other Issue, constituting 0.3% (Table 4-1/Figure 4-1).

**Figure 4-1: MFHC Fair Housing Complaints, 2015-2019**



Source: Metropolitan Fair Housing Council of Oklahoma, 2020

Typical renter’s rights complaints deal with the legal rights and responsibilities between landlords and tenants and some laws govern those interactions. Complaints regarding disabilities deal with a different set of issues. For people that have a physical or mental disability (including hearing, mobility, and visual impairments, chronic alcoholism, chronic mental illness, AIDS, AIDS Related Complex and mental retardation) that substantially limits one or more major life activities, landlords may not refuse to let a tenant make reasonable modifications to the dwelling or common use areas, at the tenant’s expense so the disabled person can use the housing. Where reasonable, the landlord may permit changes only if the tenant agrees to restore the property to its original condition when their period of tenancy has ended. Landlords cannot refuse to make reasonable accommodations in rules, policies, practices, or services, if necessary, for the disabled person to use the housing.

Regarding family status-related complaints, unless a building or community qualifies as housing for older persons, it may not discriminate based on familial status. That is, it may not discriminate against families in which one or more children under 18 live with: (1) a parent, (2) a person who has legal custody of the child or children, or (3) the designee of the parent or legal custodian, with the parent or custodian's written permission. Familial status protection also applies to pregnant women and anyone securing legal custody of a child under 18.<sup>1</sup>

**C. U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD)**

The Office of Fair Housing and Equal Opportunity (FHEO) at HUD receives formal complaints regarding alleged violations of the FHA filed by individuals or organizations such as MFHC on behalf of the individuals. Fair housing complaints originating in Norman were obtained and analyzed for the period starting from 2015 through 2019. A total of 17 complaints were filed with and received by HUD's Fort Worth Region VI Office, including six filed by MFHC. The majority (70.6%) of the received complaints were related to Disability issues, with 12 records for this reason. Two complaints were for both Sex and Disability related issues, and one complaint was only for Sex related issues. Also, one record was for National Origin reason, and one was for Familial Status issues (Table 4-2).

**Table 4-2**

**HUD Fort Worth Region VI Office  
 Fair Housing Complaints, 2015-2019  
 City of Norman, OK**

Category	2015	2016	2017	2018	2019	Total	Total Percent
Race or Color	0	0	0	0	0	0	0.0%
National Origin	1	0	0	0	0	1	5.9%
Religion	0	0	0	0	0	0	0.0%
Sex (Harassment/Gender/LGBT)	1	1	0	1	0	3	17.6%
Familial Status	0	1	0	0	0	1	5.9%
Disability	3	4	3	0	2	12	70.6%
Age and/or Other Issue	0	0	0	0	0	0	0.0%
Marital Status	0	0	0	0	0	0	0.0%
Income Source (Section 8, etc.)	0	0	0	0	0	0	0.0%
LGBT Issue	0	0	0	0	0	0	0.0%
Criminal/Arrest Issue	0	0	0	0	0	0	0.0%
Renters' Rights & Other	0	0	0	0	0	0	0.0%
<b>Total</b>	<b>5</b>	<b>6</b>	<b>3</b>	<b>1</b>	<b>2</b>	<b>17</b>	<b>100.0%</b>

Source: HUD Fort Worth Region VI Office, 2020

**D. OFFICE OF THE STATE ATTORNEY GENERAL**

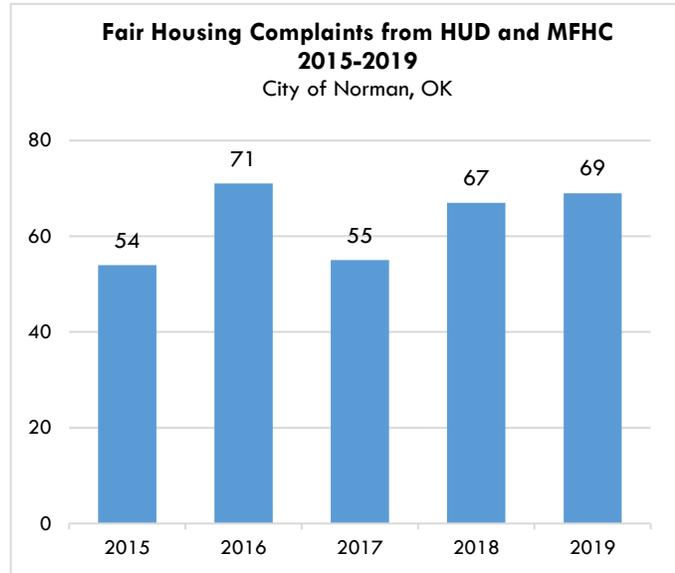
The Office of Civil Rights Enforcement (OCRE) is a division of the Attorney General's Office of Oklahoma and is responsible for enforcing the Anti-Discrimination Act, which prohibits discrimination in employment, housing, and public accommodation, as well as enforcing other civil rights related laws. The OCRE took over investigating fair housing complaints from the Oklahoma Human Rights Commission in July 2012. The Attorney General's Office did not respond to RKG's request for housing discrimination complaint records in May 2020, although this is likely due to the absence of complaints filed with OCRE.

<sup>1</sup> LegalAidOK website: <https://oklaw.org/resource/fair-housing-its-your-right-1>

## E. SUMMARY OF FAIR HOUSING COMPLAINTS

An analysis of the combined complaint records from both HUD and MFHC indicates an increase in fair housing discrimination complaints generated in Norman between 2017 and 2019 after a drop between 2016 and 2017 (Figure 4-2). “Renter’s Rights, Landlord/Tenant and Other” issue was the most common basis for complaints, with 164 complaints originated accounting for 51.6% of all intakes and filings received by both HUD and MFHC. Disability was the second most common basis for complaints, with 100 records for this reason accounting for 31.4%, followed by 31 Familial Status complaints, representing 9.7% of all cases (Table 4-3).

Figure 4-2



Source: Metropolitan Fair Housing Council of Oklahoma, 2020

Table 4-3  
**Total Fair Housing Complaints, 2015-2019**  
 City of Norman, OK

Category	2015	2016	2017	2018	2019	Total	Total Percent
Race or Color	1	1	1	3	0	6	1.9%
National Origin	2	1	1	0	0	4	1.3%
Religion	0	0	0	0	0	0	0.0%
Sex (Harassment/Gender/LGBT)	1	3	1	1	0	6	1.9%
Familial Status	1	7	7	8	8	31	9.7%
Disability	16	18	19	18	29	100	31.4%
Age and/or Other Issue	0	0	0	1	0	1	0.3%
Marital Status	0	0	0	0	0	0	0.0%
Income Source (Section 8, etc.)	1	1	1	2	1	6	1.9%
LGBT Issue	0	0	0	0	0	0	0.0%
Criminal/Arrest Issue	0	0	0	0	0	0	0.0%
Renters' Rights & Other	33	41	25	34	31	164	51.6%
<b>Total</b>	<b>55</b>	<b>72</b>	<b>55</b>	<b>67</b>	<b>69</b>	<b>318</b>	<b>100.0%</b>

Source: Metropolitan Fair Housing Council of Oklahoma and HUD Fort Worth Region VI Office, 2020

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# 5 REVIEW OF PUBLIC SECTOR POLICIES

## A. INTRODUCTION

Public policies set the direction for a city's socioeconomic prospects and priorities in practice. They influence numerous facets of residents' life and establish principles to distribute resources. Policies, practices, or procedures that appear neutral when taken at face value, may actually deny or adversely affect the provision of housing to persons of a particular race, color, religion, sex, disability, familial status, or national origin and create impediments to fair housing choice.

An element of the Analysis of Impediments to Fair Housing Choice includes an examination of a city's policies in terms of their impact on housing choice. This section evaluates and compares the current City policies to those in the 2015 Analysis of Impediments to Fair Housing Choice to determine opportunities for accelerating the expansion of fair housing choice.

## B. POLICIES GOVERNING INVESTMENT OF FUNDS FOR HOUSING AND COMMUNITY DEVELOPMENT

An examination of the City's current budget is essential for understanding how the financial resources in support of fair housing choice have increased or declined since the 2015 Analysis. The City of Norman receives federal entitlement funds directly and indirectly from HUD in the form of:

- **Community Development Block Grant (CDBG):** The primary objective of this program is to develop viable urban communities by providing decent housing, a suitable living environment, and economic opportunities, principally for persons of low- and moderate-income levels. Funds can be used for a wide array of activities, including housing rehabilitation, homeownership assistance, lead-based paint detection and removal, construction or rehabilitation of public facilities and infrastructure, removal of architectural barriers, public services, rehabilitation of commercial or industrial buildings, and loans or grants to businesses.
- **HOME Investment Partnerships Program:** The HOME program provides federal funds for the development and rehabilitation of affordable rental and ownership housing for low- and moderate-income households. HOME funds can be used for activities that promote affordable rental housing and homeownership by low- and moderate-income households, including reconstruction, moderate or substantial rehabilitation, homebuyer assistance, and tenant-based rental assistance.
- **Emergency Solutions Grant (ESG):** The ESG program provides federal funds to provide homeless persons with basic shelter and essential supportive services. The funds can also be used for short-term homeless prevention assistance to low- and moderate-income (LMI) households.
- **Continuum of Care Program (CoC):** The Continuum of Care Program is designed to promote communitywide commitment to the goal of ending homelessness; provide funding for efforts by nonprofit providers, and State and local governments to quickly rehouse homeless individuals and families while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness; promote access to and effect utilization of

mainstream programs by homeless individuals and families; optimize self-sufficiency among individuals and families experiencing homelessness.

## 1. Project Funding Criteria

Funding allocations follow the principle of meeting high priority needs across Norman for projects primarily benefiting low- and moderate-income residents. The assignment of funding priorities is based on meeting the statutory requirements of the CDBG and HOME programs, input from members of housing and community services, public meetings, and public hearings. Every five years, the City of Norman Department of Planning and Development is required to prepare a 5-year Consolidated Plan as a federal funding grantee, which provides guidelines for annual allocations of received funds. For each year included in the Consolidated Plan, the City is also required to prepare an Annual Action Plan, showing how annual entitlement funds will be distributed to meet the overall 5-year goals.

## 2. Distribution of Funds

- Community Development Block Grant (CDBG):** Table 5-1/Map 5-1 displays how the City utilized the CDBG funds by program type and location of the projects, and the allocated amounts over the last five Fiscal Years since the 2015 Analysis of Impediments to Fair Housing Choice.

The CDBG Program requires that most activities benefit low- to moderate-income persons, which are defined by HUD as persons with household incomes below 80% of the area median income. Most of the designated projects will directly serve Norman residents who qualified based on their income or other criteria (Housing Programs and Public Service funding). The other infrastructure or neighborhood projects are area benefit activities, or projects located in parts of the City where over half the residents have low or moderate incomes.

**Table 5-1**

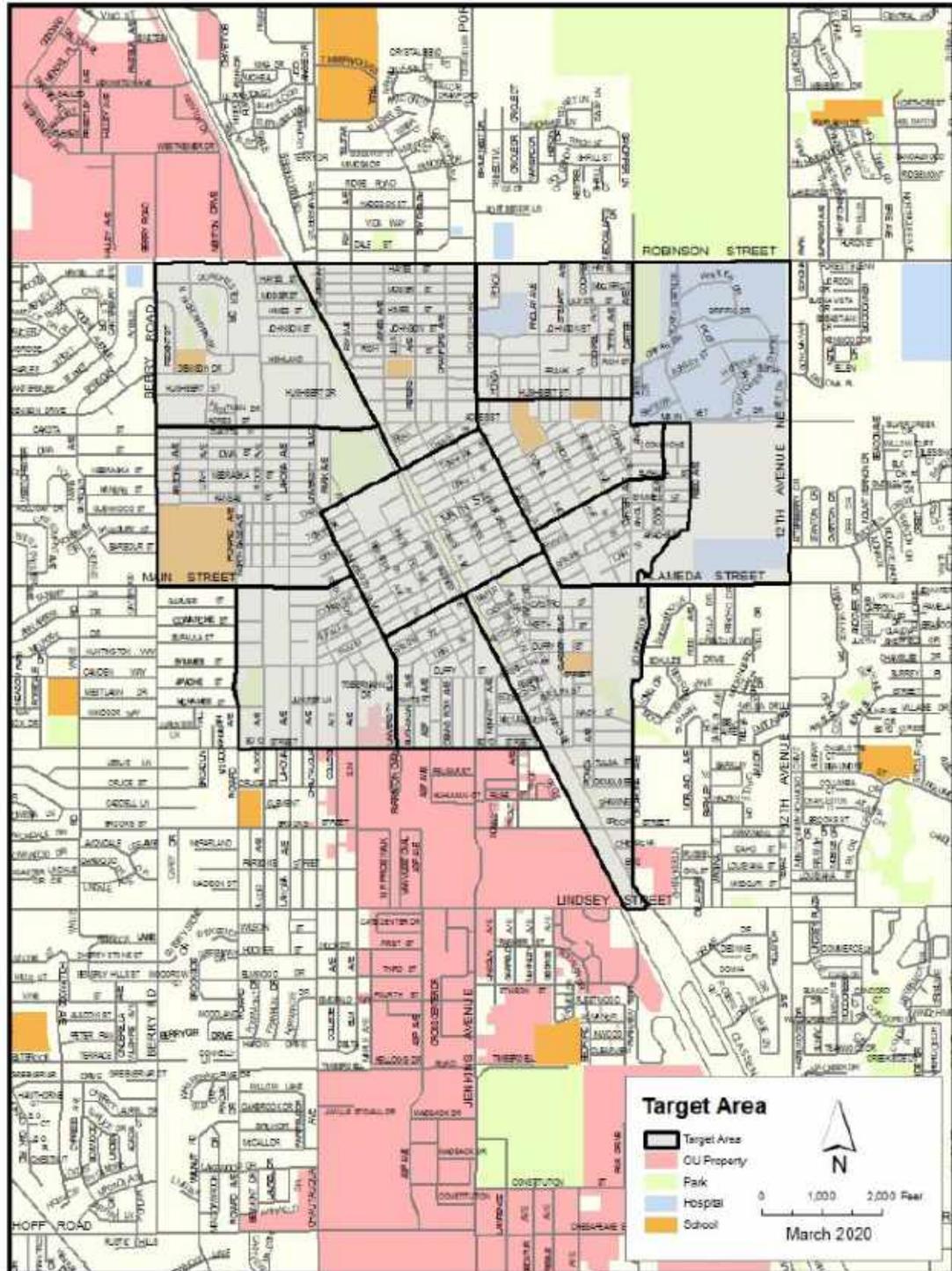
**Uses of HUD Community Development Block Grant Funds 2015-2019  
 City of Norman, Oklahoma**

<b>FFY 2015 Activities</b>	<b>Amount</b>
<b>Administration and Planning</b>	<b>\$138,862</b>
<b>Metropolitan Fair Housing Council of Oklahoma</b>	<b>\$10,000</b>
<b>Public Services</b>	<b>\$111,500</b>
CART Bus Pass Program	\$35,000
Public Services - Homeless Services Coordination	\$53,500
Public Services - Homeless Case Management	\$23,000
<b>Housing Rehabilitation</b>	<b>\$483,952</b>
<b>TOTAL FFY 2015</b>	<b>\$744,314</b>
<b>FFY 2016 Activities</b>	<b>Amount</b>
<b>Administration and Planning</b>	<b>\$134,199</b>
<b>Metropolitan Fair Housing Council of Oklahoma</b>	<b>\$10,000</b>
<b>Public Services</b>	<b>\$109,907</b>
CART Bus Pass Program	\$35,000
Public Services - Homeless Services Coordination	\$44,907
Housing First Case Management	\$30,000
<b>Housing Rehabilitation</b>	<b>\$502,197</b>
<b>TOTAL FFY 2016</b>	<b>\$756,303</b>
<b>FFY 2017 Activities</b>	<b>Amount</b>
<b>Administration and Planning</b>	<b>\$141,260</b>
<b>Metropolitan Fair Housing Council of Oklahoma</b>	<b>\$10,000</b>
<b>Public Services</b>	<b>\$113,445</b>
CART Bus Pass Program	\$35,000
Public Services - Homeless Services Coordination	\$48,640
Housing First Case Management/Outreach	\$29,805
<b>Housing Rehabilitation</b>	<b>\$319,611</b>
<b>Neighborhood Projects</b>	<b>\$182,500</b>
Acres: Findlay-Stewart	\$60,000
Alley Rehabilitation	\$12,500
Acquisition of Land for Non-Profits	\$25,000
Acquisition of Land for Housing	\$85,000
<b>TOTAL FFY 2017</b>	<b>\$766,816</b>
<b>FFY 2018 Activities</b>	<b>Amount</b>
<b>Administration and Planning</b>	<b>\$142,791</b>
<b>Metropolitan Fair Housing Council of Oklahoma</b>	<b>\$10,000</b>
<b>Public Services</b>	<b>\$109,330</b>
CART Bus Pass Program	\$35,000
Public Services - Homeless Services Coordination	\$65,000
<b>Housing Rehabilitation</b>	<b>\$381,532</b>
<b>Neighborhood Projects</b>	<b>\$75,000</b>
<b>Norman Affordable Housing, Acquisition of Property</b>	<b>\$100,000</b>
<b>Acquisition of Property for Non-Profit Use</b>	<b>\$25,000</b>
<b>TOTAL FFY 2018</b>	<b>\$843,653</b>
<b>FFY 2019 Activities</b>	<b>Amount</b>
<b>Administration and Planning</b>	<b>\$140,418</b>
<b>Metropolitan Fair Housing Council of Oklahoma</b>	<b>\$10,000</b>
<b>Public Services</b>	<b>\$102,452</b>
CART Bus Pass Program	\$35,000
Public Services - Homeless Services Coordination	\$67,452
<b>Housing Rehabilitation</b>	<b>\$262,974</b>
<b>Neighborhood Projects</b>	<b>\$235,000</b>
<b>Norman Affordable Housing, Acquisition of Property</b>	<b>\$100,000</b>
<b>TOTAL FFY 2019</b>	<b>\$850,844</b>

Source: City of Norman, OK, 2020

Projects in other areas of the City are eligible for CDBG funding if they individually benefit low- or moderate-income individuals or persons who meet other HUD criteria including those of a presumed benefit. Map 5-1 shows the City's 2020 CDBG Target Area.

Map 5-1



Source: City of Norman, OK, 2020

The 2015 Analysis of Impediments to Fair Housing Choice concluded that the City's allocations have suffered large cuts that reflect federal reductions in funding distributed through HUD programs. Between FY2005 and FY2014, the CDBG funds allocated to Norman declined by 25.7%. The City's CDBG allocation in FY2014 was \$721,987.

In comparison, the City's CDBG funding allocations have been steadily increasing between FY2015 and FY2019 by 14.3%. The City has been providing annual funding to the Metropolitan Fair Housing Council of Oklahoma (MFHC) from its CDBG allocations. Currently, MFHC is the only HUD-qualified full-service private nonprofit fair housing enforcement and advocacy organization in Oklahoma. The annual allocation has remained at \$10,000 between FY2015 and FY2019.

The City's annual CDBG allocation to MFHC is helping to further fair housing choice in Norman. However, as Norman's CDBG funding increases, the CDBG funds that MFHC receives only accounts for around 1% of the total allocation each year with no growth between Fiscal Years 2015 through 2019. It is recommended that the City include increasing its annual allocation to the Metropolitan Fair Housing Council of Oklahoma into its funding priorities.

Historically, the City has spent around 10% of its CDBG funds on public services related to homelessness and rehousing. However, this percentage dropped to around 8% in FY2018 and FY2019. In addition, housing rehabilitation activities accounted for roughly 65% of Norman's annual CDBG spending in FY2015 and FY2016 but declined to 42% in FY2017, and to 31% in FY2019.

Since FY2017, Norman has been allocating around 12% of its annual CDBG funds to purchase land and properties for affordable housing. The annual share of all housing related CDBG allocations reduced from 77% in FY2015 to 52% in FY2019. Though community development in Target Area is one of the goals outlined in the 2020-2024 Consolidated Plan, it is recommended that the City consider using alternative funding sources (such as private and institutional donations, and developer contributions) for neighborhood projects that are not related to housing. For example, 4%-6% of the CDBG funds were used for tree planting under neighborhood projects in FY2018 and FY2019. The City can consider updating its zoning/site plan ordinance to require tree plantings/landscaping within the Target Area, for site redevelopment projects.

- **HOME Investment Partnerships Fund (HOME):** The HOME Investment Partnerships Program (HOME) is the largest Federal block grant designed exclusively to create affordable housing for low-income households. The HOME program requires that participating state or local governments match every dollar in program funds with 25 cents from nonfederal sources, which may include donated materials or labor, the value of donated properties, proceeds from bond financing, and other resources. At least 15% of the allocations must be reserved to fund housing to be owned, developed, or sponsored by experienced, community-driven nonprofit groups designated as Community Housing Development Organizations (CHDOs). Participating jurisdictions must also ensure that HOME-funded housing units remain affordable in the long term (20 years for new construction of rental housing; 5-15 years for construction of homeownership housing and housing rehabilitation). For rental housing and rental assistance, at least 90% of benefiting families must have incomes that are no more than 60% of the HUD-adjusted area median family income. In rental projects with five or more assisted units, at least 20% of the units must be occupied by families with incomes at or below 50% of the HUD-adjusted median. The households receiving HUD assistance must be low- or moderate-income, which is below 80% of the area median.

The 2015 AI concluded that the City’s HOME allocations also followed the national trend of HUD funding reduction. Between FY2005 and FY2014, the HOME funds allocated to Norman fell by 46.9%. Norman’s FY2014 HOME budget was \$318,067. Table 5-2 shows the City’s allocations since FY2015.

Compared to the FY2014 budget, Norman’s FY2019 HOME allocation increased by 17.9%, despite fluctuations during the interim years. This is a positive trend, as the City’s allocations for affordable housing development and tenant-based rental assistance also rose by 7.6% and 125.0%, respectively compared to the FY2014 allocation.

Another advancement has been the creation of Norman’s Community Housing Development Corporation, (CHDO 2015), in 2015. The HOME funds it receives has also increased by 26.6% between FY2015 and FY2019. CHDO 2015 partners with the Norman Affordable Housing

Corporation (NAHC) acting as the sponsor of the housing development projects. They recently developed six affordable units at 301 and 303 Vicksburg Circle, which are now owned and operated by the NAHC as part of its Housing Concepts units.

The Metropolitan Fair Housing Council of Oklahoma (MFHC) also receives \$10,000 annually from the City’s HOME allocations, which accounts for 2% to 3% of the City’s annual HOME funds and it has not changed since FY2015. It is recommended that the City consider increasing its HOME allocation to MFHC, as it is currently the only HUD-qualified full-service private nonprofit organization for fair housing issues in Oklahoma.

- **Emergency Shelter Grant (ESG):** The current Emergency Solutions Grant Program (ESG) award amount is \$168,935, which is utilized by Food and Shelter, Thunderbird Clubhouse, and Salvation Army. The final allocation of the ESG award for each agency has not been decided yet. The amounts proposed by the three agencies are \$100,000 for Food and

**Table 5-2**

**Uses of HUD HOME Investment Partnerships Funds 2015-2019**

**City of Norman, Oklahoma**

<b>FFY 2015 Activities</b>	<b>Amount</b>
Administration	\$19,620
Metropolitan Fair Housing Council of Oklahoma	\$10,000
Community Housing Development Corporation	\$44,433
CHDO Operating Expense	\$14,000
Tenant Based Rental Assistance for Chronic Homeless	\$40,000
Affordable Housing Development	\$168,158
<b>TOTAL FFY 2015</b>	<b>\$296,211</b>
<b>FFY 2016 Activities</b>	<b>Amount</b>
Administration	\$21,665
Metropolitan Fair Housing Council of Oklahoma	\$10,000
Community Housing Development Corporation	\$47,500
CHDO Operating Expense	\$15,000
Affordable Housing Development	\$222,281
<b>TOTAL FFY 2016</b>	<b>\$316,657</b>
<b>FFY 2017 Activities</b>	<b>Amount</b>
Administration	\$20,971
Metropolitan Fair Housing Council of Oklahoma	\$10,000
Tenant Based Rental Assistance	\$14,009
Community Housing Development Corporation	\$47,457
Affordable Housing Development	\$217,281
<b>TOTAL FFY 2017</b>	<b>\$309,718</b>
<b>FFY 2018 Activities</b>	<b>Amount</b>
Metropolitan Fair Housing Council of Oklahoma	\$10,000
Community Housing Development Corporation	\$63,530
Affordable Housing Development	\$349,995
<b>TOTAL FFY 2018</b>	<b>\$423,525</b>
<b>FFY 2019 Activities</b>	<b>Amount</b>
Administration	\$5,000
Metropolitan Fair Housing Council of Oklahoma	\$10,000
Community Housing Development Corporation	\$56,248
Affordable Housing Development	\$213,726
Tenant Based Rental Assistance	\$90,000
<b>TOTAL FFY 2019</b>	<b>\$374,974</b>

Source: City of Norman, OK, 2020

Shelter, \$80,000 for Thunderbird Clubhouse, and \$50,000 for the Salvation Army. This is also the first year that Salvation Army reapplied since they withdrew their application for the 2013 ESG. The amounts that the three organizations applied for have been close to those discussed in the 2015 AI, though the current award amount is comparatively 6.5% lower.

- **Continuum of Care (CoC):** The City's FY2019 final CoC allocation is \$426,422. Catholic Charities was awarded \$63,914. Shelter Plus Care Norman was awarded \$104,556 and \$24,717 separately for their expansion. Thunderbird Clubhouse received \$71,212 for renewing its tenant-based rental assistance project for at least 10 one-bedroom units that serve the chronically homeless population and adults experiencing severe mental illnesses. Food and Shelter's Supportive Housing Program (SHP) 2020-2021 with 11 single units was awarded \$122,961 for renewal. Two new housing units under the Norman Permanent Housing program FY2019 that serve homeless adult individuals with serious mental illness and/or substance use disorders were funded totaling \$26,475. \$12,587 was allocated to the CoC Planning Application. The City's FY2019 CoC allocation is 42% higher than the total proposed FY2014 CoC budget, which was \$301,302.
- **Norman Housing Authority:** The HUD Funding for the Norman Housing Authority (NHA) from June 30th, 2019 to June 30th, 2020 is approximately \$7.1 million to assist the continuation of support to the management and maintenance of 173 public housing units and 1,299 Housing Choice Vouchers, including the following:
  - \$800,000 for its public housing capital fund, and
  - \$6.3 million were provided to Section 8 participating landlords on behalf of Housing Choice Voucher participants.

Compared to the \$5.5 million NHA funding discussed in the 2015 AI, the current funding that NHA received has increased by approximately 29%.

### C. PUBLIC HOUSING AND SECTION 8 VOUCHER PROGRAMS

The Norman Housing Authority (NHA) is responsible for the administration of Public Housing and Section 8 Housing Choice Voucher Program and federal rent subsidy certificates and vouchers awarded by HUD from the Section 8 Housing Choice Voucher Program. The Section 8 program currently does Project-Based Vouchers with two agencies in the area, including:

- **Bridges of Norman:** Bridges is a nonprofit formed through a collaboration of the Norman community, Norman Public Schools, and the NHA. Bridges assists high school students who live alone due to a family crisis, including the death of a parent, parental incarceration, or homelessness, by offering 20 Section 8 individual apartments with sliding-scale rent based on the student's income, connection to other social service agencies, and assistance with almost any school-related activity, trained mentors, and college scholarships.
- **Thunderbird Clubhouse:** This organization serves adults recovering from mental illness. They carry two Norman Housing Section 8 vouchers that members can utilize to obtain housing.

In addition to these two agencies, Central Oklahoma Community Action Agency (COCAA) used to carry 20 Section 8 vouchers and Food and Shelter used to carry six vouchers as discussed in the 2015 AI. However, they currently do not carry Section 8 vouchers any longer, and their previous set-asides are grouped back to the general voucher pool. Note that the 1,299 total amount of the Section 8 voucher households already includes the 22 set-asides for Bridges of Norman and Thunderbird Clubhouse.

Table 5-3 shows the publicly assisted housing projects in Norman by category.

**Table 5-3**  
**Publicly Assisted Housing Projects**  
**City of Norman, Oklahoma**

	Population Served	TOTAL	Efficiency	One Bedroom	Two Bedroom	Three Bedroom	Four Bedroom
<b>Norman Affordable Housing Corporation Housing Concept</b>							
Housing Concept Units	General	37	0	4	6	27	0
<b>Public Housing</b>							
Rose Rock Villa	Elderly/Disabled	91	0	90	1	0	0
Red Bud Village	General	38	0	6	22	10	0
Crystal Heights	General	18	0	0	12	4	2
Colonial Estates	General	16	0	0	10	6	0
Jamestown	General	10	0	3	3	3	1
<b>Section 8 New Construction</b>							
Vicksburg Village	General	100	0	24	44	32	0
<b>202 Projects for Elderly and/or Persons with Disabilities</b>							
The Willows	Elderly/Disabled	23	6	13	4	0	0
Pathways	Elderly/Disabled	6	6	0	0	0	0
Pathways	Elderly/Disabled	3	0	0	3	0	0
Pathways	Elderly/Disabled	11	0	10	1	0	0
Northcliff Gardens	Elderly/Disabled	44	0	44	0	0	0
<b>811 Projects for Persons with Disabilities</b>							
McKinzie Gardens I	Disabled	17	0	17	0	0	0
McKinzie Gardens II	Disabled	22	0	22	0	0	0
<b>Low Income Housing Tax Credit Projects</b>							
Emerald Greens	General	220	1	69	149	1	0
Senior Cottages	Elderly	80	0	20	40	20	0
Chapel Ridge	General	144	0	48	56	40	0
Villa de Vey	Elderly	92	0	42	50	0	0
Garland Square	Elderly	10	0	10	0	0	0
Garland Square	General	100	0	38	38	24	0
Wyndam Place	Elderly	54	0	54	0	0	0
Brookstone Cottages	Elderly	68	0	68	0	0	0
Bocage Senior	Elderly	60	0	30	30	0	0
<b>Absentee Shawnee Tribal Housing Authority (ASHA) Single-Family Home Projects</b>							
ASHA Single-Family Homes	American Indian Tribal Member	28	0	0	1	27	0
<b>TOTAL</b>		<b>1,292</b>	<b>13</b>	<b>612</b>	<b>470</b>	<b>194</b>	<b>3</b>

Source: City of Norman and RKG Associates, Inc., 2020

Maps 5-2 and 5-3 identify the locations of the publicly assisted housing projects and the Section 8 voucher households in Norman, respectively. Some of the dots signifying Section 8 households represent multiple units in a single location.





Currently, there are six applicants on the waiting list for Norman’s public housing. Four applications are for one-bedroom units and two are for two-bedroom units. Since the opening of the public housing waiting list in March of 1980, NHA has received 9,004 total applications. Among all the applicants on the waiting list, the majority (80%) of them are White, and the rest of them are either Black or American Indian/Alaska Native applicants, accounting for 10%, respectively. 10% of all applicants are of Hispanic ethnicity. There have not been Asian nor Native Hawaiian/Pacific Islander applicants for public housing. Also, 30% of the applicants are households with family members with disabilities (Table 5-4).

An estimated 524 applicants are currently on the waiting list for the Section 8 Voucher program, with 62.8% of them being White, followed by Black applicants at 24.8%, and American Indian/Alaska Native applicants at 5.7%. Asian and Native Hawaiian/Pacific Islander applicants are also the least common, with one applicant from each group currently on the waiting list. 34, or 6.5% of the applicants on the waiting list are Hispanic (Table 5-5).

In terms of family type, 46.8% of the applicants on the Section 8 Voucher program waiting list are families with children, followed by families with disabilities at 27.1%. 71 applicants on the waiting list are elderly families, accounting for 13.6%.

One-bedroom units are the most sought-after unit type, with over half (51.3%) of the applicants on the waiting list applying for one-bedroom units, followed by two-bedroom units accounting for 26.7%, and three-bedroom units at 18.1%. Only two applicants on the waiting list applied for studios and only one application was for a large unit with five or more bedrooms. 18.7% of the applicants on the waiting list fall under the targeted preference, which targets the non-elderly disabled group according to NHA. The average wait time for the applicants on the Section 8 waiting list is 155 days.

**Table 5-4**

**Applicants for All Public Housing Waiting List To Date, 1980-2020  
 City of Norman, Oklahoma**

<b>Total To Date</b>	<b>9,004</b>
<b>Race/Ethnicity</b>	
White	80%
Black	10%
American Indian/Alaska Native	10%
Asian	0%
Native Hawaiian/Pacific Islander	0%
Hispanic	10%
Non-Hispanic	90%
<b>Family Type</b>	
Families with Disabilities	30%

Source: Norman Housing Authority and RKG Associates, Inc., 2020

**Table 5-5**

**Current Applicants on Section 8 Voucher Program Waiting List, 2020  
 City of Norman, Oklahoma**

	Current Applicants (Households)	
	Number	Percent
<b>Total</b>	<b>524</b>	<b>100.00%</b>
<b>Race/Ethnicity</b>		
White	329	62.79%
Black	130	24.81%
American Indian/Alaska Native	30	5.73%
Asian	1	0.19%
Native Hawaiian/Pacific Islander	1	0.19%
Hispanic	34	6.49%
Non-Hispanic	489	93.32%
<b>Family Type</b>		
Families with Children	245	46.76%
Elderly Families	71	13.55%
Families with Disabilities	142	27.10%
<b>Bedroom Size</b>		
0 Bedroom	2	0.38%
1 Bedroom	269	51.34%
2 Bedroom	140	26.72%
3 Bedroom	95	18.13%
4 Bedroom	11	2.10%
5/+ Bedroom	1	0.19%
<b>Preference</b>		
Targeted Preference	98	18.70%

Source: Norman Housing Authority and RKG Associates, Inc., 2020

According to the 2015 AI, representatives of the NHA indicated that their greatest need was for more one-bedroom units that adhere to the nonelderly/non-disabled population. RKG Associates reached out to NHA again during this update to the Analysis of Impediments to Fair Housing Choice, and a representative of NHA confirmed that this need for one-bedroom units has been consistent. They mentioned this is most likely because developers are not incentivized to build one-bedroom units: while the construction cost of one-bedroom units is high, these units provide fewer rent incomes compared to units with more bedrooms, such as three-bedroom units.

According to NHA, there have been HUD grants in recent years for mainstream vouchers (for people with disabilities who are non-senior under 62) and HUD-VASH vouchers (for veterans), and as a result, Norman's Section 8 vouchers have increased slightly. Compared to the 1,185 baseline vouchers discussed in the 2015 AI, Norman has added Section 8 vouchers by 9.6% to 1,299. However, representatives of NHA also indicated that due to the COVID-19 pandemic, people's need for housing assistance has skyrocketed, but as no one is likely to move out from existing Section 8 voucher units, there is no change in the supply. NHA probably will not be able to house people from the Section 8 waiting list for the next year due to the lack of open units.

#### D. PRIVATE HOUSING PROGRAMS

The City of Norman supports a range of services and programs that meet the needs of low- and moderate-income households, including those with special needs. The following programs focus on private sector housing:

- **Owner-Occupied Housing Rehabilitation Program:** The City provides CDBG funds for the rehabilitation of low income (50% and below MFI) owner-occupied housing units to correct code violations citywide. Funds are provided in the form of a Deferred Payment Mortgage that is forgiven over four years. The remaining balance of the mortgage is due in full upon transfer of title for the property. The cost of the required lead hazard control will be in the form of a grant to the property owner.
- **Owner Occupied Emergency Repair Program:** The City provides CDBG funds for addressing urgent repair needs of low income (80% and below MFI) owner-occupied housing units citywide. Funds are provided in the form of a Deferred Payment Mortgage that is forgiven over four years. These mortgages are due in full upon transfer of title for the property.
- **Exterior Improvement Program:** This program allows low- and moderate-income (80% and below MFI) owner-occupied properties located within the CDBG Target Area that have been cited by a City of Norman Code Compliance Officer for exterior property maintenance violations to be eligible for financial assistance utilizing CDBG funds. A maximum project of \$5,000 can address items including but not limited to: exterior property maintenance, removal of storage buildings, driveway replacement/installation, and dead/diseased tree removal.
- **Owner Occupied Accessibility Modification Program:** The City provides CDBG funds for addressing accessibility modification needs of low- and moderate-income (80% and below MFI) owner-occupied housing units citywide. Funds are provided in the form of a Deferred Payment Mortgage that is forgiven over four years. These mortgages are due in full upon transfer of title for the property.
- **Renter Occupied Accessibility Modification Program:** The City will continue to provide CDBG funds for addressing accessibility modification needs of low- and moderate-income (80% and below MFI) renter-occupied housing units citywide. Projects are coordinated with the landlord upon request of a qualified tenant.
- **Accessibility Modification for Non-Profit Entities:** Funding in the form of a grant is available to 501(c)(3) entities to make accessibility modifications to their place of business, whether leased or owned. These grants are available one time only per agency for a maximum amount of \$6,000.

- **Development of Affordable Housing Program:** HOME funding will be utilized alone or in conjunction with other funding sources to purchase, rehabilitate, or construct units to be utilized as rental housing for populations at or below 80% of the median family income.

## E. LAND USE AND COMPREHENSIVE PLANNING

Norman updated its Comprehensive Plan in early 2018. The new plan, PlanNorman, provides a series of tools for managing future growth and development over the next 25 years in terms of transportation, housing, land use, education, economic development, natural resources, and recreation. The update process began in 2016 and it was completed based on the foundation of inputs from various sources, including a 50-member Steering Committee composed of local residents, business owners, and representatives from organizations and institutions in Norman.

The Housing and Neighborhood Revitalization section of the plan calls for combating involuntary gentrification with enough housing diversity and choices within the community's housing stock. It emphasizes the importance of integrating a variety of uses, sizes, and housing types throughout the community with a mixed-income approach to ensure housing accessibility for different income levels, ages, races, and family make-ups. The section's overarching goal is to "encourage greater housing choice, affordability, livability, and accessibility within Norman's existing and new neighborhoods". To accomplish this, the plan laid out the following policies:

- Promote a diversity of housing types to accommodate residents of various incomes, household sizes, lifestyles, ages, and levels of ability and mobility.
- Preserve and enhance the value of Norman's housing stock by encouraging reinvestment in and maintenance of the City's existing neighborhoods.
- Protect and enhance the character of Norman's neighborhoods by requiring compatible infill development, as well as compatible redevelopment in adjacent areas and corridors.
- Promote the development of livable neighborhoods that encourages active lifestyles and provides a range of amenities.
- Promote access to parks and other public spaces in new development and redevelopment.

The following actions are also advanced to realize the plan's housing goals:

- Create incentives in new developments to encourage a diverse range of housing options.
- Investigate a land bank fund and other strategies to purchase, renovate, and preserve properties in areas undergoing rapid change.
- Investigate an 'Early Warning System' and other strategies for threats to affordable housing at risk of converting.
- Create a housing renovation and weatherization fund.
- Update Neighborhood Plans.
- Increase code compliance.
- Improve or replace streetlights in older neighborhoods as funds are available.

The Community Character/Design, Future Land Use, Equity, and Community Health and Recreation sections also outlined policies that support access to fair housing choices:

- **Community Character/Design:** Promote housing options, design elements, and services compatible with each neighborhood's character that support seniors, families, and people of all ages and abilities.

- **Future Land Use:** Promote a variety of residential dwelling types that accommodate the housing needs of a diverse and growing population.
- **Equity:** Support the creation of a diverse range of housing types that serve residents of various incomes, household sizes, lifestyles, ages, and levels of ability and mobility throughout Norman's neighborhoods.
- **Community Health and Recreation:** Ensure that all neighborhoods have convenient access to parks, open spaces, trails, schools, and neighborhood services.

The 2015 AI concluded that the 2025 Land Use and Transportation Plan which was adopted in 2004 does not include stated intentions of desegregation and inclusion based on race or ethnicity, and the City's previous Comprehensive Plan only discusses the preferred density and intensity of residential neighborhoods. In comparison, PlanNorman explicitly states ensuring housing accessibility for different income levels, ages, races, lifestyles, ability, mobility, and family make-ups as one of its guiding principles. It also acknowledges mixed-income as a critical approach for integration, as well as the importance of "a combination of single-family detached and attached homes, including condos and townhomes, as well as multi-family homes like apartments" for diverse housing types.

## F. ZONING

Norman recently revised its zoning to increase different types of density and characteristics of residential neighborhoods by adding higher-density residential zones. In addition to the low-density General Agricultural District, Rural Agricultural District and the Residential Estate Dwelling District discussed in the 2015 AI, the latest zoning ordinance updated in April 2020 also includes:

- **Single Family Dwelling District:** The district is generally for one-family detached dwellings and other permitted uses. Density is one dwelling unit per 6,000 square feet.
- **Single Family Attached Dwelling District:** The district is designed to allow single-family residential development that utilizes common wall technology and zero lot line construction to provide an alternative housing form that is compatible with other types of low-density residential development. Main and accessory buildings shall not cover more than (40%) of the area of the lot which should be at least 4,500 square feet.
- **Two Family Dwelling District:** Density is one dwelling unit per 5,000 square feet of land used for single-family purposes and one dwelling unit per 7,000 square feet for two family purposes, or a single-family dwelling and a garage apartment.
- **Low Density Apartment District:** The district is designed to provide areas for low-density multifamily housing which will be compatible, in terms of limitations of bulk and the providing of open space, with adjoining single-family and two-family development. Density is at least 3,250 square feet of lot area per family on any lot. The ratio of floor area to lot area shall not exceed 0.40.
- **Mobile Home Park District:** District is designed to encourage the development of properly planned mobile home parks in residential environments, as well as to protect existing mobile home parks. There shall be a lot area of not less than 4,000 square feet. The minimum size of a mobile home subdivision shall be 10 acres.
- **Medium Density Apartment District:** The district is designed to encourage the developing of neighborhoods having a variety of dwelling types, including townhouses, thus providing for the varying requirements of families. The regulations are intended to ensure compatibility with adjacent existing and proposed low-density apartment development. The density for single-family use is one dwelling per 5,000 square feet, and for two-family use is one dwelling per 6,500 square feet. The minimum area of a lot for apartment house use is 9,000 square feet. The Floor Area Ratios of the site should not exceed 0.4 and the ratio of livability space to floor area (Livability Space Ratio) is at least 0.95.

- **Multi-Family Dwelling District:** Density is one dwelling per 5,000 square feet for a single-family dwelling and one dwelling per 7,000 square feet for a two-family dwelling or a single-family dwelling and a garage apartment. The minimum lot size is 9,000 square feet for apartment houses with three or fewer units, and 3,000 square feet additional area for each dwelling unit more than three on the lot.
- **Residence-Office District:** The district is designed to provide areas for high-density residential development; limited offices, convenience goods stores, and personal service establishments in conjunction with residential uses; primarily in the vicinity of the campus business district. The minimum area of a lot for residential use should be 6,000 square feet, and the ratio of floor area to lot area should not exceed 0.6. For a large lot at least 40,000 square feet, the Floor Area Ratio should not exceed 0.8, the ratio of open space to floor area should be at least 0.85, and the ratio of livability space to floor area should be at least 0.4.
- **Mixed Use Development District:** The primary purpose is to create an environment that permits a mix of housing types, commercial businesses, offices, and institutional buildings in a pedestrian-oriented neighborhood with a sense of community and place. It is also intended to accommodate a variety of housing types and discourage one housing type from dominating the streetscape. The maximum allowed density is 30 dwelling units per gross acre. It also requires a mixture of residential types and encourages a mixture of densities and house sizes to provide a range of housing choices.

The inclusion of higher-density residential and mixed-use zoning is a positive development for Norman in terms of affordable housing development. Compared to the General Agricultural District, Rural Agricultural District, and Residential Estate Dwelling District zones discussed in the 2015 AI, these newly added higher-density zones allow smaller land sizes with more units, which lowers the per unit land costs and increases revenues from rents or sales for developers. It will also lower the site infrastructure costs (e.g. roads, water, sewer, etc.) passed along to each homebuyer or renter. Often, these higher-density residential developments occur in more urban and suburban areas that are already developed, reducing the need for site infrastructure construction and costs. All these factors help to incentivize more developers to construct affordably-priced housing that meets the needs of low- and moderate-income residents in Norman.

## **G. PROPERTY TAXES AND HOUSING AFFORDABILITY**

According to the Cleveland County Assessor's Office, there are five types of property tax exemptions and credit programs available in Norman based on property owners' ownership, income, age, disability, and veteran status. These include Homestead Exemption, Additional Homestead Exemption, Senior Valuation Freeze, State of Oklahoma Property Tax Credit/Refund Program, and 100% Disabled Veterans Exemption, which advance the housing affordability especially for low-income, senior, disabled and veteran homeowners.

The Homestead Exemption is available to all Cleveland County homeowners who reside in their properties on January 1 and whose deeds were executed on or before January 1 and filed with the County Clerk's Office on or before February 1. It allows for the exemption of \$1,000 in the property assessed valuation. The Additional Homestead Exemption provides an additional \$1,000 assessment exemption on top of the Homestead Exemption for homeowners whose gross household incomes from all sources did not exceed \$20,000 for the past calendar year. The prerequisite of the Additional Homestead Exemption is that applicants must first qualify for the Homestead Exemption.

The Senior Valuation Freeze benefits homeowner households whose head-of-household (must be an owner-occupant of the Homestead property on January 1, 2017) must be age 65 or older before January 1, 2017. The gross household income derived from the HUD cannot exceed \$64,400 for the preceding calendar year.

Any resident of Oklahoma during the previous year who is 65 or older or totally disabled, and whose gross household income does not exceed \$12,000 is qualified for the State of Oklahoma Property Tax Credit/Refund Program.

The 100% Disabled Veterans Exemption provides the exemption from property tax for 100% disabled veterans. The Oklahoma Department of Veterans Affairs (ODVA) would send out letters to every veteran qualified for this tax break.

## **H. COMMUNICATION AND OUTREACH**

The City developed a citizen participation process in 1995 for the Consolidated Plan as a condition of receiving funds under the Community Development Block Grant (CDBG) and HOME Investment Partnerships Program from HUD. It was then restructured as the Citizen Participation Plan in April 2014, and recently revised in May 2020. The revised Citizen Participation Plan retains the structure of the previous process, with some cleanups for a shortened process as the Coronavirus Aid, Relief, and Economic Security (CARES) Act Funding has allowed in response to the COVID-19 pandemic. The process includes neighborhood meetings for all CDBG Target Neighborhoods; a public hearing to identify housing and community development needs and review program performance; a Policy Committee with emphasis on Target Neighborhood residents; Policy Committee meetings to recommend priorities to the City Council; publication and public review of proposed Consolidated Plan/Annual Action Plan and Consolidated Annual Performance and Evaluation Report (CAPER); special outreach to encourage public participation and involve individuals and organizations that represent low-income, minority and non-English speaking persons, and persons with disabilities; technical assistance; access to information/meetings; and a procedure for complaints.

The Metropolitan Fair Housing Council of Oklahoma (MFHC) is the only organization that is engaged in the communication and outreach efforts related to fair housing issues in Oklahoma, including Norman. MFHC still conducts fair housing education and outreach activities in the City since the 2015 AI. MFHC's services include:

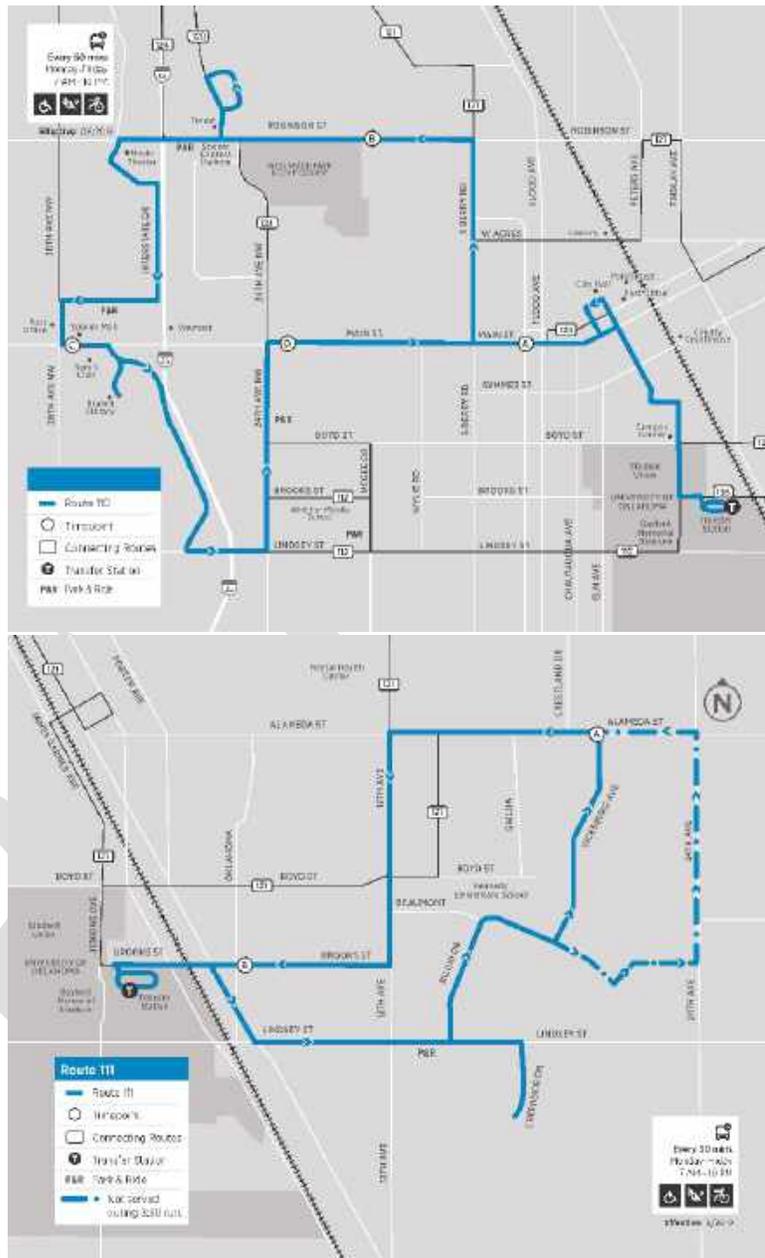
- Homebuyer education classes (English and Spanish) for first-time homebuyers on credit stability, lending, financing, and insurance processes, preventing predatory lending, loss mitigation, and foreclosure prevention,
- Fair housing counseling and advocacy for persons who have limited English proficiency (LEP) or have Spanish as a first language,
- Fair housing training for consumers, advocates, faith-based organizations, public and private organizations as well as the housing industry on rights and remedies under fair housing laws,
- Fair housing laws and litigation training for MFHC Cooperating Attorneys, public and private attorneys involved in civil rights, consumers, advocates and agencies involved in compliance with the Civil Rights Act of 1964, Civil Rights Act of 1968 (1988 Amendments) and other federal laws and executive orders if the agency is a recipient of federal funds, and
- Fair housing education material publication and distribution.

## **I. PUBLIC TRANSPORTATION**

As mentioned in the Demographic and Housing section, The City of Norman absorbed the operation of the transit system from Cleveland Area Rapid Transit (CART) on July 1st, 2019 and contracted with EMBARK (the Oklahoma City transit provider) to operate the system. The original routes were split with the University of Oklahoma (OU) keeping all the five campus routes that are free for OU students and the City of Norman retaining the remaining fixed routes. At this point, all original routes remain available but some changes to the scheduling have been made.

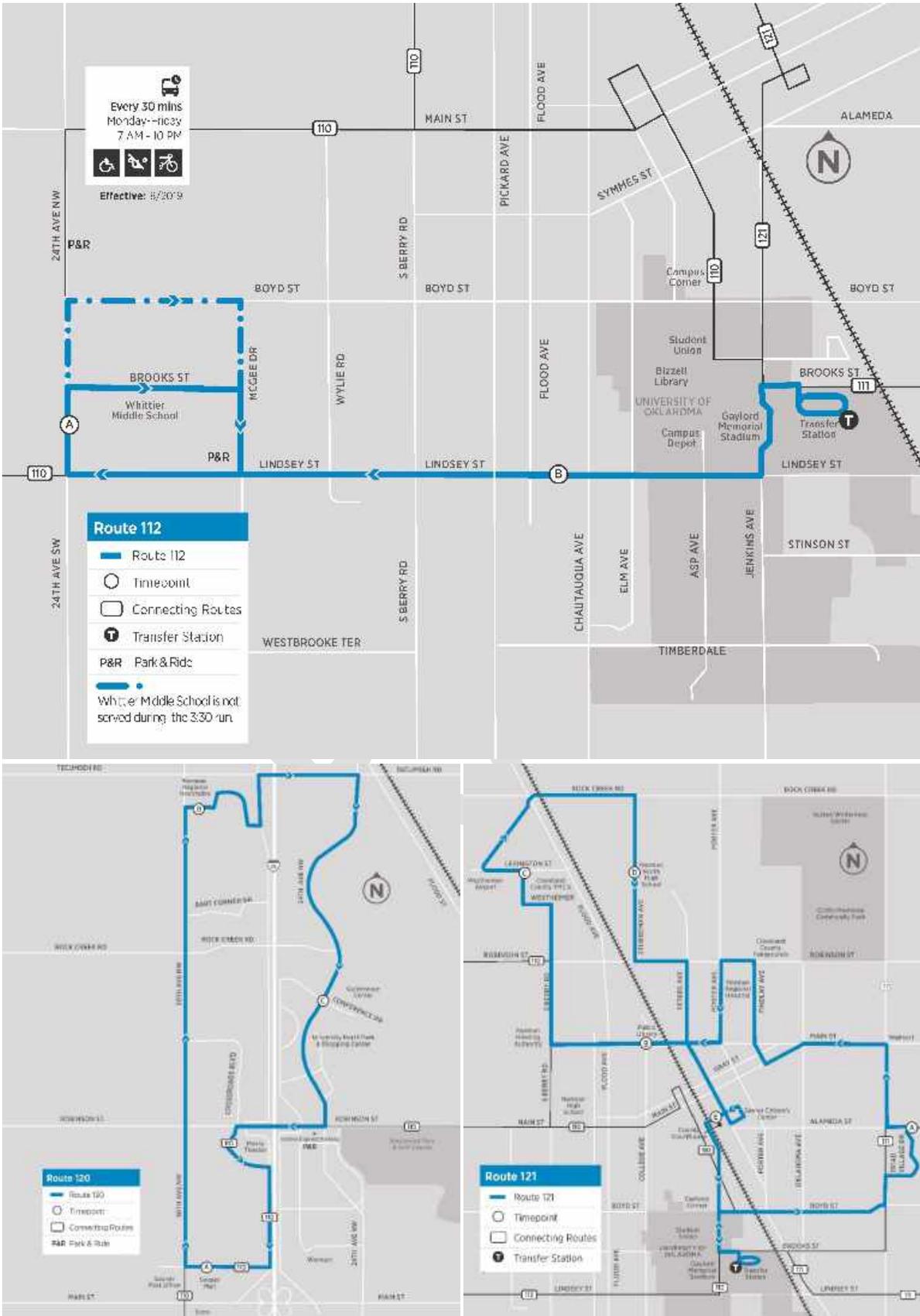
Under EMBARK Norman, the City has five local fixed routes operating from 7 AM to 10 PM on weekdays. Also, EMBARK Norman has a Sooner Express commuter route to Oklahoma City offered six times a day Monday through Friday, and a route to the Moore Social Security Office provided twice a week. The City also provides the EMBARK Plus lift-equipped paratransit service (previously CARTaccess) to people who are functionally unable to utilize the local fixed routes. EMBARK Plus is a shared-ride public transportation service and requires an application and eligibility determination before use.

Map 5-4: EMBARK Norman Routes



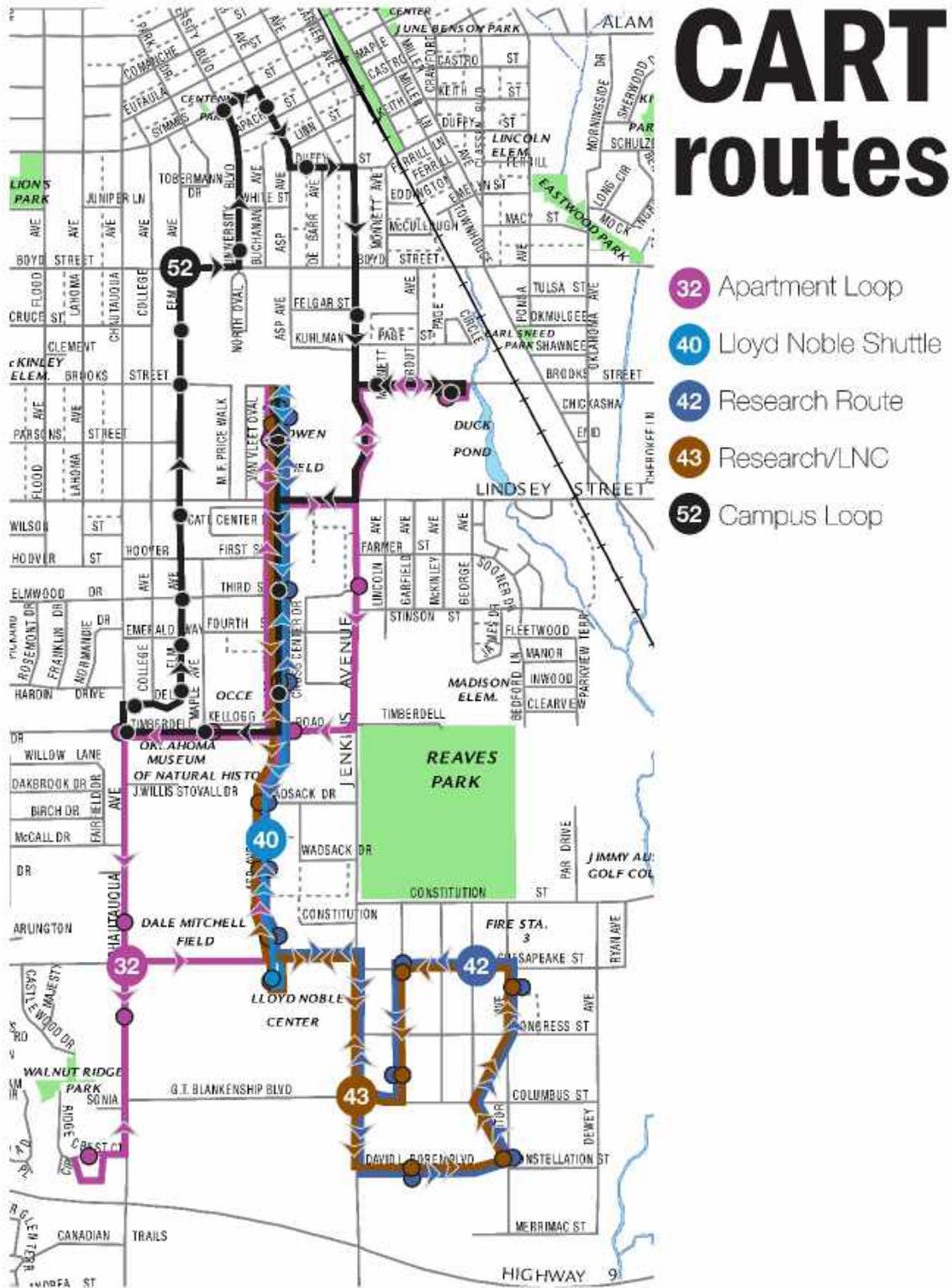
The major change since the 2015 AI is that the City passed a 1/8 cent sales tax in the fall of 2019 to underwrite the transit operation. The City of Norman transit service is currently operating fare-free until June 30, 2021, according to the City.

Map 5-4 (Continued): EMBARK Norman Routes





Map 5-5: University of Oklahoma Campus Routes



Source: University of Oklahoma Campus Area Rapid Transit (CART), 2020

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# 6 REVIEW OF PRIVATE SECTOR PRACTICES

## A. MORTGAGE APPLICATION TRENDS

RKG Associates reviewed the practices associated with access to rental housing options and home mortgage lending as part of an assessment of housing market conditions and identifying potential impediments to fair housing choices. The Fair Housing Act prohibits lenders from discriminating against members of the protected classes in granting mortgage loans, providing information on loans, imposing the terms and conditions of loans (such as interest rates and fees), conducting appraisals, and considering whether to purchase loans. The access to fair housing choice requires fair and equal access to the mortgage lending market regardless of race, color, national origin, religion, sex, familial status, disability, or any other statutorily protected basis.

An analysis of the mortgage applications and their outcomes can help the City to identify possible discriminatory lending practices and patterns in a community. The Home Mortgage Disclosure Act (HMDA) was originally enacted by Congress in 1975 and is implemented by Regulation C. It requires many financial institutions to maintain, report, and publicly disclose loan-level information about residential mortgages. Any commercial lending institution that makes five or more home mortgage loans annually must report all residential loan activity to the Federal Reserve Bank, including information on applications denied, withdrawn, or incomplete by race, sex, and income of the applicant. This information is used to determine whether financial institutions are serving the housing needs of their communities.

The latest HMDA data available for the City of Norman is from 2018. This study has included three years of data from 2016 to 2018 for all types of applications received by lenders. This includes applications for all loan purposes (home purchase loans, home improvement loans, and refinancing loans) for all property types (i.e., site-built single-family homes with one to four units, site-built multi-family units with 5 or more units, and manufactured housing units) in Norman. Table 6-1 summarizes all the applications between 2016 and 2018 by application result, loan purpose, loan type, property type, and applicant race/ethnicity in Norman.

### 1. Loan Application Demand

Among the total of 15,235 mortgage applications received between 2016 and 2018, 8,364 (54.9%) were approved and originated by the lender. Over half (57.0%) of the applications received by lenders were for home purchases, followed by home refinancing (31.7%) and home improvements (8.9%). If excluding loans for other purposes and non-applicable data, home improvement loan applications had the highest origination rate at 63.0% among all loan purposes, followed by home purchase loans at 57.9%, while refinancing loans had the lowest origination rate at 48.8%. However, 25.7% of the home improvement loans were denied, which was the highest percentage among the three major purposes, while home purchase loans had the lowest denial rate of 8.3%. Refinancing loan applications were more likely to be withdrawn or were incomplete, at a rate of 18.6%, followed by the home purchase loan applications with a rate of 9.9%. A small portion (around 2.4% to 4.9%) of all the applications were approved but not accepted.

The most common type of application was for conventional loans, accounting for 71.6% of all loan types. Conventional loans were most likely to be denied compared to the rest, with the highest denial

rate at 14.9%, while it also had the highest origination rate of 58.3%, which is higher than the 54.9% average. The second most common type of application was for loans insured by the Federal Housing Administration (FHA) (17.0% among all types), which had the lowest denial rate at 11.5%. Applications for loans backed by the Department of Veteran Affairs (VA) were not very common, constituting 11.3% of all applications, but they had the second most successful origination following conventional loans at a rate of 48.4%, and also the lowest denial rate at 11.5%. However, they were more likely to be withdrawn or were incomplete, with a rate of 17.6%. Loans backed by the Farm Services Administration or Rural Housing Service (FSA/RHS) were the least common, with only 17 applications for them accounting for 0.1%. They also had the lowest origination rate at 35.3% and the second highest denial rate at 11.8%.

The vast majority (94.5%) of the applications were for site-built single-family homes with one to four units, accounting for 14,404 out of the 15,235 total applications. There were only 72 applications for site-built multi-family units with five or more units in structure, but they had the most successful origination rate at 83.3%. Applications for manufactured housing units were the least successful, with most of them being either approved but not accepted, denied, withdrawn, or incomplete (Table 6-1).

**Table 6-1**  
**Cumulative Mortgage Data Summary, 2016-2018**  
**City of Norman, Oklahoma**

	All Mortgage Activities		Originated		Approved Not Accepted		Denied		Withdrawn/Incomplete	
	Count	Percent	Count	Percent	Count	Percent	Count	Percent	Count	Percent
<b>Loan Purpose</b>										
Home Purchase	8,691	57.0%	5,033	57.9%	314	3.6%	724	8.3%	860	9.9%
Home Improvement	1,353	8.9%	852	63.0%	66	4.9%	348	25.7%	65	4.8%
Refinancing	4,823	31.7%	2,355	48.8%	125	2.6%	934	19.4%	897	18.6%
Other/Not Applicable	368	2.4%	124	33.7%	9	2.4%	118	32.1%	29	7.9%
<b>Total</b>	<b>15,235</b>	<b>100.0%</b>	<b>8,364</b>	<b>54.9%</b>	<b>514</b>	<b>3.4%</b>	<b>2,124</b>	<b>13.9%</b>	<b>1,851</b>	<b>12.1%</b>
<b>Loan Type</b>										
Conventional	10,913	71.6%	6,367	58.3%	420	3.8%	1,627	14.9%	1,218	11.2%
FHA	2,589	17.0%	1,161	44.8%	49	1.9%	297	11.5%	330	12.7%
VA	1,716	11.3%	830	48.4%	45	2.6%	198	11.5%	302	17.6%
FSA/RHA	17	0.1%	6	35.3%	0	0.0%	2	11.8%	1	5.9%
<b>Total</b>	<b>15,235</b>	<b>100.0%</b>	<b>8,364</b>	<b>54.9%</b>	<b>514</b>	<b>3.4%</b>	<b>2,124</b>	<b>13.9%</b>	<b>1,851</b>	<b>12.1%</b>
<b>Property Type</b>										
Single Family (1-4 Units): Site-Built	14,404	94.5%	8,109	56.3%	379	2.6%	1,828	12.7%	1,738	12.1%
Multifamily Unit (5+ Units): Site-Built	72	0.5%	60	83.3%	6	8.3%	2	2.8%	3	4.2%
Manufactured Housing Unit	759	5.0%	195	25.7%	129	17.0%	294	38.7%	110	14.5%
<b>Total</b>	<b>15,235</b>	<b>100.0%</b>	<b>8,364</b>	<b>54.9%</b>	<b>514</b>	<b>3.4%</b>	<b>2,124</b>	<b>13.9%</b>	<b>1,851</b>	<b>12.1%</b>
<b>Applicant Race/Ethnicity</b>										
White	10,260	67.3%	6,126	59.7%	379	3.7%	1,533	14.9%	1,333	13.0%
Black	359	2.4%	175	48.7%	22	6.1%	82	22.8%	55	15.3%
American Indian/Alaska Native	644	4.2%	340	52.8%	26	4.0%	133	20.7%	94	14.6%
Asian	436	2.9%	252	57.8%	13	3.0%	55	12.6%	64	14.7%
Native Hawaiian/Other Pacific Islander	42	0.3%	27	64.3%	2	4.8%	8	19.0%	3	7.1%
Two or More Races	4	0.0%	0	0.0%	0	0.0%	3	75.0%	1	25.0%
Some Other Race	207	1.4%	122	58.9%	9	4.3%	34	16.4%	28	13.5%
No Data/Not Applicable	3,283	21.5%	1,322	40.3%	63	1.9%	276	8.4%	273	8.3%
Hispanic or Latino*	562	3.7%	309	55.0%	21	3.7%	125	22.2%	70	12.5%
<b>Total</b>	<b>15,235</b>	<b>100.0%</b>	<b>8,364</b>	<b>54.9%</b>	<b>514</b>	<b>3.4%</b>	<b>2,124</b>	<b>13.9%</b>	<b>1,851</b>	<b>12.1%</b>

\* Not counted towards the totals

Source: HMDA data and RKG Associates, Inc., 2020

## 2. Mortgage Lending Trends by Race/Ethnicity

The racial and ethnic distribution of loan applications between 2016 and 2018 does not align with the 2019 racial and ethnic composition of the population in Norman. While 75.8% of Norman's 2019 population is White, 85.8% of all the applicants between 2016 and 2018 were White. People of All Other Race (including Two or More Races and Some Other Race) and the Hispanic population were underrepresented in the mortgage applications between 2016 and 2018, with only 1.8% and 4.4%

of the applicants were reported of all other race and Hispanic ethnicity, respectively. However, in comparison, 8.6% and 8.3% of Norman's 2019 population are of All Other Race and are Hispanic, respectively.

The numbers of applications rose slightly for applicants of All Other Race and for home purchase loans (by 8.9%) between 2016 and 2018 but declined for all other loan purposes and all other racial/ethnic groups during the same period. In particular, home improvement loan applications dropped by 61.0% and Native Hawaiian/Other Pacific Islander applicants and American Indian/Alaska Native applicants decreased significantly by 60.0% and 33.8%, respectively. The total applications in 2018 reduced by 13.5% compared to 2016 (Table 6-2).

**Table 6-2**

**Loan Application Type by Applicant Race/Ethnicity (Excluding No Data/Not Applicable), 2016-2018**  
 City of Norman, Oklahoma

	Total	White	Black	American Indian /Alaska Native	Asian	Native Hawaiian /Other Pacific Islander	Two or More Races	Some Other Race	Hispanic/Latino*
<b>2016</b>									
Home Purchase	2,166	1,856	62	137	102	9	0	0	97
Home Improvement	523	469	17	30	5	2	0	0	23
Refinancing	1,703	1,526	48	73	47	9	0	0	64
Other/Not Applicable	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>4,392</b>	<b>3,851</b>	<b>127</b>	<b>240</b>	<b>154</b>	<b>20</b>	<b>0</b>	<b>0</b>	<b>184</b>
<b>2017</b>									
Home Purchase	2,186	1,871	63	159	84	9	0	0	106
Home Improvement	471	406	16	35	12	2	0	0	23
Refinancing	1,102	973	41	51	34	3	0	0	44
Other/Not Applicable	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>3,759</b>	<b>3,250</b>	<b>120</b>	<b>245</b>	<b>130</b>	<b>14</b>	<b>0</b>	<b>0</b>	<b>173</b>
<b>2018</b>									
Home Purchase	2,359	1,921	68	99	124	6	2	139	120
Home Improvement	204	163	4	16	6	1	1	13	8
Refinancing	982	860	32	36	13	1	1	39	29
Other/Not Applicable	256	215	8	8	9	0	0	16	11
<b>Total</b>	<b>3,801</b>	<b>3,159</b>	<b>112</b>	<b>159</b>	<b>152</b>	<b>8</b>	<b>4</b>	<b>207</b>	<b>168</b>
<b>Total 2016-2018</b>									
Home Purchase	6,711	5,648	193	395	310	24	2	139	323
	<b>56.15%</b>	<b>84.16%</b>	<b>2.88%</b>	<b>5.89%</b>	<b>4.62%</b>	<b>0.36%</b>	<b>0.03%</b>	<b>2.07%</b>	<b>4.81%</b>
Home Improvement	1,198	1,038	37	81	23	5	1	13	54
	<b>10.02%</b>	<b>86.64%</b>	<b>3.09%</b>	<b>6.76%</b>	<b>1.92%</b>	<b>0.42%</b>	<b>0.08%</b>	<b>1.09%</b>	<b>4.51%</b>
Refinancing	3,787	3,359	121	160	94	13	1	39	137
	<b>31.69%</b>	<b>88.70%</b>	<b>3.20%</b>	<b>4.22%</b>	<b>2.48%</b>	<b>0.34%</b>	<b>0.03%</b>	<b>1.03%</b>	<b>3.62%</b>
Other/Not Applicable	256	215	8	8	9	0	0	16	11
	<b>2.14%</b>	<b>83.98%</b>	<b>3.13%</b>	<b>3.13%</b>	<b>3.52%</b>	<b>0.00%</b>	<b>0.00%</b>	<b>6.25%</b>	<b>4.30%</b>
<b>Total</b>	<b>11,952</b>	<b>10,260</b>	<b>359</b>	<b>644</b>	<b>436</b>	<b>42</b>	<b>4</b>	<b>207</b>	<b>525</b>
	<b>100.0%</b>	<b>85.84%</b>	<b>3.00%</b>	<b>5.39%</b>	<b>3.65%</b>	<b>0.35%</b>	<b>0.03%</b>	<b>1.73%</b>	<b>4.39%</b>
<b>Change 2016-2018</b>									
Home Purchase	8.9%	3.5%	9.7%	-27.7%	21.6%	-33.3%	0.0%	0.0%	23.7%
Home Improvement	-61.0%	-65.2%	-76.5%	-46.7%	20.0%	-50.0%	0.0%	0.0%	-65.2%
Refinancing	-42.3%	-43.6%	-33.3%	-50.7%	-72.3%	-88.9%	0.0%	0.0%	-54.7%
Other/Not Applicable	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>-13.5%</b>	<b>-18.0%</b>	<b>-11.8%</b>	<b>-33.8%</b>	<b>-1.3%</b>	<b>-60.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>-8.7%</b>

\* Not counted towards the totals.

Source: HMDA data and RKG Associates, Inc., 2020

**B. GEOGRAPHIC DISTRIBUTION OF MORTGAGE APPLICATION APPROVAL**

The cumulative mortgage approval rate between 2016 and 2018 across the 27 census tracts in Norman range from 33.2% (Census Tract 2003) to 66.7% (Census Tracts 2007 and 2012.01). Census Tracts 2008, 2014.03, 2014.05, 2015.09 and 2015.10 have each seen their total applications during the three years reaching 1,000 and above, more than other census tracts in the City. The census tract with the least applications between 2016 and 2018 is 2007, with a total of 3 applications, followed by Census Tract 2012.02 with 15 total applications (Table 6-3). As discussed in the demographic and housing section, according to the 2018 American Community Survey (ACS) 5-Year Estimates, there are no ownership units in Census Tract 2007, which does not align with the mortgage application data here. It is most likely because the 2018 ACS data did not capture the new housing developments that have since occurred in this census tract.

However, the mortgage approval rate depends on both the number of applications and the number of approved cases in a certain neighborhood, which are associated with numerous other factors, including applicants' preference for a certain neighborhood, and the demographic and economic status of the applicants. Therefore, no single factor can explain why mortgage approval rates are higher in some neighborhoods than others. To quantify how successful mortgage applicants were in pursuing mortgage financing in each neighborhood compared to the rest of the City between 2016 and 2018, RKG developed a special matrix and this analysis is detailed below in Part D Housing Demand and Access Index Analysis.

**Table 6-3**

**Mortgage Application Approval, 2016-2018  
 City of Norman, Oklahoma (Census Tracts)**

	Total Application	Total Approval	Approval Rate
2001	31	18	58.06%
2002	203	113	55.67%
2003	570	189	33.16%
2004	321	194	60.44%
2005	368	240	65.22%
2006.01	543	317	58.38%
2006.02	357	209	58.54%
2007	3	2	66.67%
2008	1,053	587	55.75%
2009	475	271	57.05%
2010	504	323	64.09%
2011.01	571	332	58.14%
2011.02	286	168	58.74%
2012.01	42	28	66.67%
2012.02	15	9	60.00%
2012.03	600	345	57.50%
2013.01	517	288	55.71%
2014.03	1186	657	55.40%
2014.04	397	207	52.14%
2014.05	1133	633	55.87%
2015.05	748	405	54.14%
2015.07	835	487	58.32%
2015.08	301	153	50.83%
2015.09	1073	568	52.94%
2015.1	1225	723	59.02%
2024.02	956	436	45.61%
2024.03	922	462	50.11%

Source: HMDA data and RKG Associates, Inc., 2020

**C. MORTGAGE APPLICATION DENIALS**

Between 2016 and 2018, a total of 2,124 mortgage applications were denied, with a cumulative denial rate of 13.9%. HMDA data has provided detailed information for the 1,330 denials among the total denied applications by primary reasons for the denial and by applicant race/ethnicity. The most common primary reason for application denial is unqualified debt-to-income ratios, accounting for 28.9%, followed by credit history issues, constituting 24.7%. This pattern differs among the applicants by racial and ethnic groups. Applications from the Native Hawaiian/Other Pacific Islander, Hispanic, American Indian/Alaska Native and Asian applicants were proportionally much

more likely to be denied for debt-to-income ratio reasons, with their denial rates for this reason at 40.0%, 38.2%, 35.4%, and 35.1%, respectively. Native Hawaiian/Other Pacific Islander and American Indian/Alaska Native applicants, as well as applicants of Two or More Races and applicants of Some Other Race were also proportionally more likely to have their applications denied for credit history issues than average, with their respective denial rates for this reason at 40.0%, 32.3%, 33.3% and 44.1% (Table 6-4).

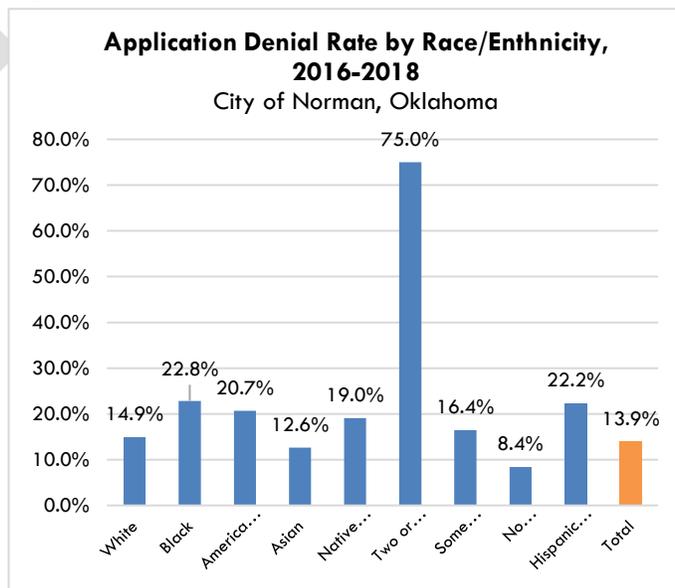
**Table 6-4**  
**Primary Reason for Mortgage Application Denial by Race/Ethnicity, 2016-2018**  
**City of Norman, Oklahoma**

	Total	White	Black	American Indian /Alaska Native	Asian	Native Hawaiian /Other Pacific Islander	Two or More Races	Some Other Race	No Data/Not Applicable	Hispanic or Latino*
Debt-to-Income Ratio	384	274	15	23	13	2	0	6	51	29
Employment History	19	12	0	1	2	0	0	1	3	2
Credit History	329	232	12	21	5	2	1	15	41	17
Collateral	259	173	7	8	11	0	1	6	53	12
Insufficient Cash (Downpayment, Closing Costs)	22	15	2	0	2	1	0	1	1	3
Unverifiable Information	59	48	3	3	1	0	0	0	4	2
Credit Application Incomplete	131	94	4	2	0	0	0	0	31	4
Mortgage Insurance Denied	2	2	0	0	0	0	0	0	0	0
Other	125	89	5	7	3	0	1	5	15	7
<b>Total</b>	<b>1,330</b>	<b>939</b>	<b>48</b>	<b>65</b>	<b>37</b>	<b>5</b>	<b>3</b>	<b>34</b>	<b>199</b>	<b>76</b>
<b>Percent</b>										
Debt-to-Income Ratio	28.9%	29.2%	31.3%	35.4%	35.1%	40.0%	0.0%	17.6%	25.6%	38.2%
Employment History	1.4%	1.3%	0.0%	1.5%	5.4%	0.0%	0.0%	2.9%	1.5%	2.6%
Credit History	24.7%	24.7%	25.0%	32.3%	13.5%	40.0%	33.3%	44.1%	20.6%	22.4%
Collateral	19.5%	18.4%	14.6%	12.3%	29.7%	0.0%	33.3%	17.6%	26.6%	15.8%
Insufficient Cash (Downpayment, Closing Costs)	1.7%	1.6%	4.2%	0.0%	5.4%	20.0%	0.0%	2.9%	0.5%	3.9%
Unverifiable Information	4.4%	5.1%	6.3%	4.6%	2.7%	0.0%	0.0%	0.0%	2.0%	2.6%
Credit Application Incomplete	9.8%	10.0%	8.3%	3.1%	0.0%	0.0%	0.0%	0.0%	15.6%	5.3%
Mortgage Insurance Denied	0.2%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Other	9.4%	9.5%	10.4%	10.8%	8.1%	0.0%	33.3%	14.7%	7.5%	9.2%
<b>Total</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

\* Not counted towards the totals  
 Source: HMDA data and RKG Associates, Inc., 2020

While the cumulative mortgage application denial rate is 13.9%, there is a disparity of denial rates across the racial and ethnic groups of applicants. Applicants of Two or More Races have seen the highest denial rate at 75.0% across all racial and ethnic groups, followed by Black, Hispanic, and American Indian/Alaska Native applicants, with their denial rates ranging between 20% and 23%. Asian applicants (excluding no data) have seen the lowest denial rate at 12.6% (Figure 6-1).

**Figure 6-1**



Source: HMDA Data and RKG Associates, Inc., 2020

## D. MORTGAGE DEMAND AND ACCESS INDEX ANALYSIS

RKG Associates prepared a special analysis of housing demand and access that examined how each racial or ethnic group performed in home purchase loan applications within each census tract between 2016 and 2018. The purpose of the analysis was to identify patterns of performance differences within each group as compared to how the group performed on average across all census tracts over the two years. “Mortgage Demand and Access Index” is a statistical measure constructed by RKG to measure and compare the relative success rate of home purchase loan application of each racial and ethnic group based on (1) the group’s ability to pay or purchase a home, (2) the proportion of the applicants by racial and ethnic group to the total population of loan applicants, (3) the loan denial rate by racial and ethnic group, and (4) the propensity of each racial and ethnic group to buy or rent within the 17 census tracts in Norman based on known housing tenure rates.

### 1. Home Purchase Loan Application Activity

Among the 6,711 home purchase loan applications with documented race and ethnic information of applicants (excluding records with no racial/ethnic data), 84.2% of them were submitted by White applicants, accounting for most applicants for home purchase loans, followed by American Indian /Alaska Native applications, with a percentage of 5.9%. 4.8% of the applications were submitted by Hispanic applicants, followed by Asian and Black applicants, making up 4.6% and 2.9% of the home purchase loan applicants, respectively. Applicants in other racial and ethnic groups constitute between 0.03% and 2.07% of all home purchase loan applicants (Table 6-5).

**Table 6-5**

**Home Purchase Loan Application by Race/Ethnicity, 2016-2018  
 City of Norman, Oklahoma**

Applicant Race/Ethnicity	Number	Percent
<b>Total</b>	<b>6,711</b>	<b>100.00%</b>
White	5,648	84.16%
Black	193	2.88%
American Indian /Alaska Native	395	5.89%
Asian	310	4.62%
Native Hawaiian/Other Pacific Islander	24	0.36%
Two or More Races	2	0.03%
Some Other Race	139	2.07%
Hispanic/ Latino*	323	4.81%

Note: Excluding No Data/Not Applicable.

\* Not counted towards the totals.

Source: HMDA data and RKG Associates, Inc., 2020

**Table 6-6**

**Ability-to-Pay Index by Race/Ethnicity, 2018  
 City of Norman, Oklahoma**

Race/Ethnicity	Median HH Income	Index
<b>Total Racial and Ethnic Groups (City-Wide)</b>	<b>\$56,229</b>	<b>1.00</b>
White	\$59,772	1.06
Black	\$30,580	0.16
American Indian/Alaska Native	\$40,446	0.61
Asian	\$42,383	0.67
Native Hawaiian/Other Pacific Islander	\$30,993	0.19
Two or More Races	\$51,046	0.90
Some Other Race	\$44,552	0.74
Hispanic or Latino	\$51,823	0.91

Source: ACS 2018 Estimates and RKG Associates, Inc., 2020

### 2. Ability-to-Pay Index

The first factor of the Housing Demand and Access Index is the “Ability-to-Pay” Index by race and ethnicity, which is the proportion of a racial/ethnic group’s median household income on the City level compared to the citywide median of \$56,229, based on 2018 American Community Survey (ACS) estimates.

An applicant’s ability to successfully obtain mortgage financing depends on several factors but is mostly dependent on the applicants’ ability-to-pay for mortgage expenses (i.e., principal, interest, taxes, and insurance). Households with higher incomes will often have more options and access to greater housing choices and mortgage loans.

The Ability-to-Pay Indices that are above 1.0 represent higher household incomes than the City median and those below 1.0 represent income levels lower than the City median. Only the White population had an index value higher than 1.0 (Table 6-6).

### **3. Mortgage Demand Index**

The “Mortgage Demand Index” is the proportion of the number of home purchase loan applications submitted between 2016 and 2018 by each racial and ethnic group as a percentage of each group’s share of the current population within each census tract. For example, if the percentage of the Hispanic or Latino population in Census Tract 2002 is 5.0%, and the number of home purchase loan applications from this group accounted for 12.2% of the total submitted, then the Mortgage Demand Index is 2.5 ( $12.2\% \div 5.0\% = 2.5$ ) in this census tract for the Hispanic or Latino population. This index value accounts for the fact that many people tend to gravitate to various neighborhoods that they prefer or where other people in their social network, racial and ethnic groups already live. In some respects, people naturally self-select their neighborhoods based on these and many other factors.

### **4. Mortgage Success Index**

The “Mortgage Success Index” measures the relative net success rate of home purchase loan mortgage originations to mortgage denials by race/ethnicity. For example, in Census Tract 2002, there were 58 mortgage loan applications either approved or denied with a total of 8 denials resulting in a net of 50 mortgage loan approved and originated, at a net success rate of 86%. For American Indian/Alaska Native applicants, there were four mortgage applications either approved or denied and there was no denial, so their net success rate was 100% in this census tract. Therefore, their Mortgage Success index was 1.16 ( $100\% \div 86\% = 1.16$ ).

### **5. Results of Mortgage Demand and Access Index**

Once the three key indices were calculated for each census tract, an overall “Mortgage Demand and Access Index” was calculated, and the results were mapped to examine where in the City racial and ethnic groups may be having difficulty accessing mortgage financing for home purchases. This analysis does not account for access issues related to rental housing and is not considered a definitive indicator of different peoples’ ability to access mortgage loans. No single factor can explain why a given group of households was successful or unsuccessful in obtaining mortgage financing in any part of the City, but this analysis examines some of the most likely factors.

To obtain a final score for each group in each census tract, RKG weighted each index score to reflect its relative importance to each group’s ability to obtain mortgage financing for home purchases. The Ability-to-Pay Index received the highest weighting factor at 50% of the final score since it is the strongest determinant of success in pursuing a home purchase loan. Income is also correlated with a household’s credit score, which is another important factor leading to a favorable credit decision.

Net Mortgage Success Index was assigned a weighting factor of 35% and Mortgage Demand Index was assigned a weighting factor of 15% so that variations between the demand and success among the various race and ethnic groups can be identified. Net mortgage success is a function of a lot of factors but is mostly related to a group’s ability to successfully obtain a mortgage loan to purchase a home. While some of those factors are related to a group’s ability to pay, credit scores, and similar factors, excessive loan denial rates could denote something else. Conversely, a group’s success rate at obtaining mortgage financing in Norman’s neighborhoods can only be judged by the demand exhibited by each group to live in these neighborhoods. If Hispanic households do not pursue mortgages to buy homes in a given census tract, it is difficult to judge why that has occurred. But if Hispanic households pursue mortgage loans in certain neighborhoods but are denied at rates exceeding their citywide denial rates, this may indicate that barriers exist.

Index values shown on the maps represent a racial or ethnic group's index value for each census tract compared to this group's citywide average. The values shown in Table 6-7 reflect the average index value for all census tracts citywide by racial/ethnic group. The darker colored census tracts with values greater than 1.0 indicate that the racial or ethnic group performed better in those census tracts. The opposite is true for lighter shaded tracts. Some groups did not perform well in some census tracts because they did not seek mortgage applications for homes in those census tracts. Those are internal decisions that applicants make

based on unknown factors, but they could be related to home sales prices, crime rates, perceptions of school quality, the quality of homes, or even the racial composition of the neighborhood.

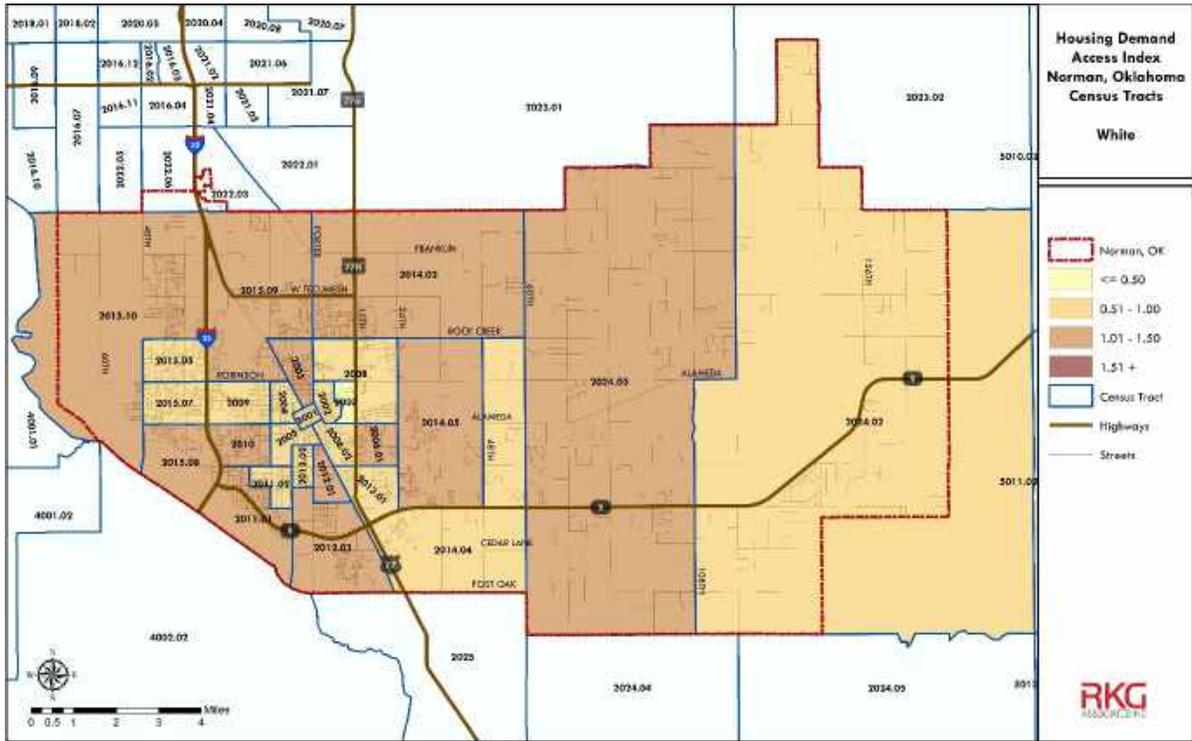
Only the people of Some Other Race (1.18) and the White population (1.04) have Demand and Access Index scores above the citywide average. The remaining racial and ethnic groups all have Demand and Access Index scores below the citywide average. In particular, the Native Hawaiian/Other Pacific Islander population and people of Two or More Races have the lowest Demand and Access Index scores, at 0.09 and 0.45, respectively. This indicates that these minority/ethnic groups have less success in obtaining mortgage financing for home purchases compared to the White population and people of Some Other Race in Norman according to the Demand and Access Index. However, again, this index does not measure all the numerous factors that influence a racial/ethnic group's success in securing home mortgage loans.

**Table 6-7**  
**Housing Demand and Access Index, City-Wide Average**  
**City of Norman, Oklahoma**

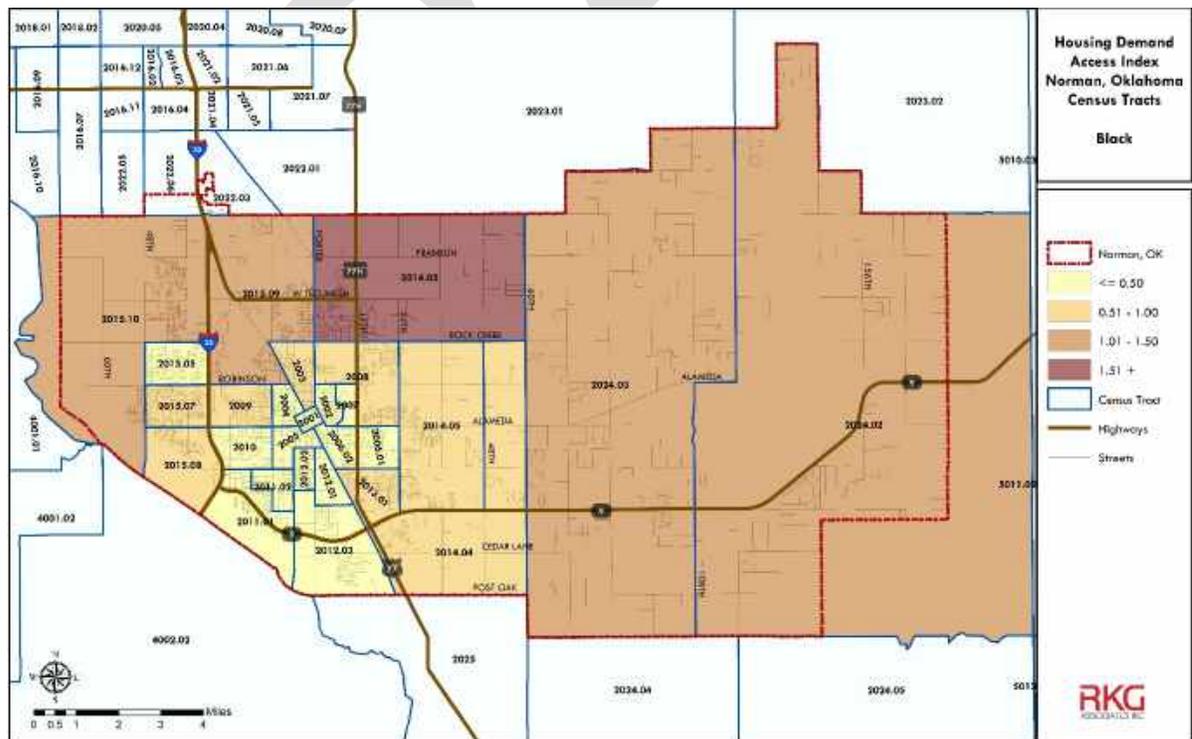
	<b>Average</b>
<b>Total Racial and Ethnic Groups</b>	<b>1.00</b>
White	1.04
Black	0.67
American Indian/Alaska Native	1.08
Asian	0.84
Native Hawaiian/Other Pacific Islander	0.09
Two or More Races	0.45
Some Other Race	1.18
Hispanic or Latino	0.91

Source: RKG Associates, Inc., 2020

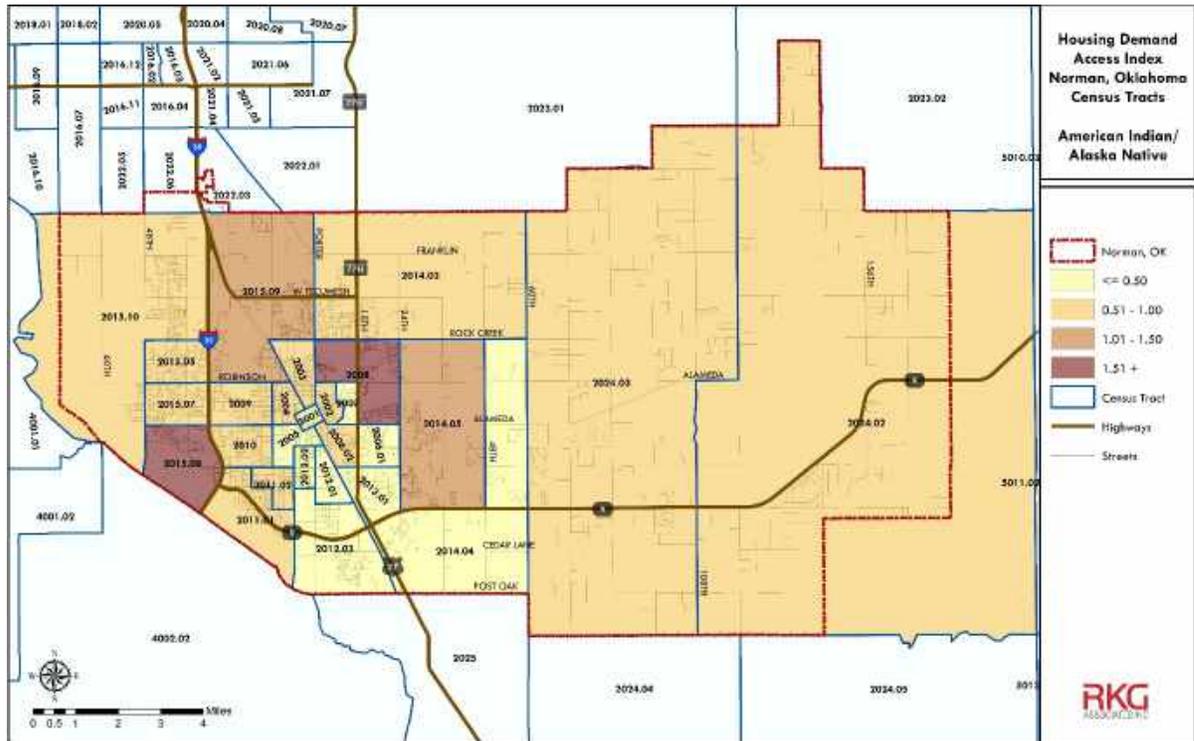
Map 6-1: Mortgage Demand & Access Index (White)



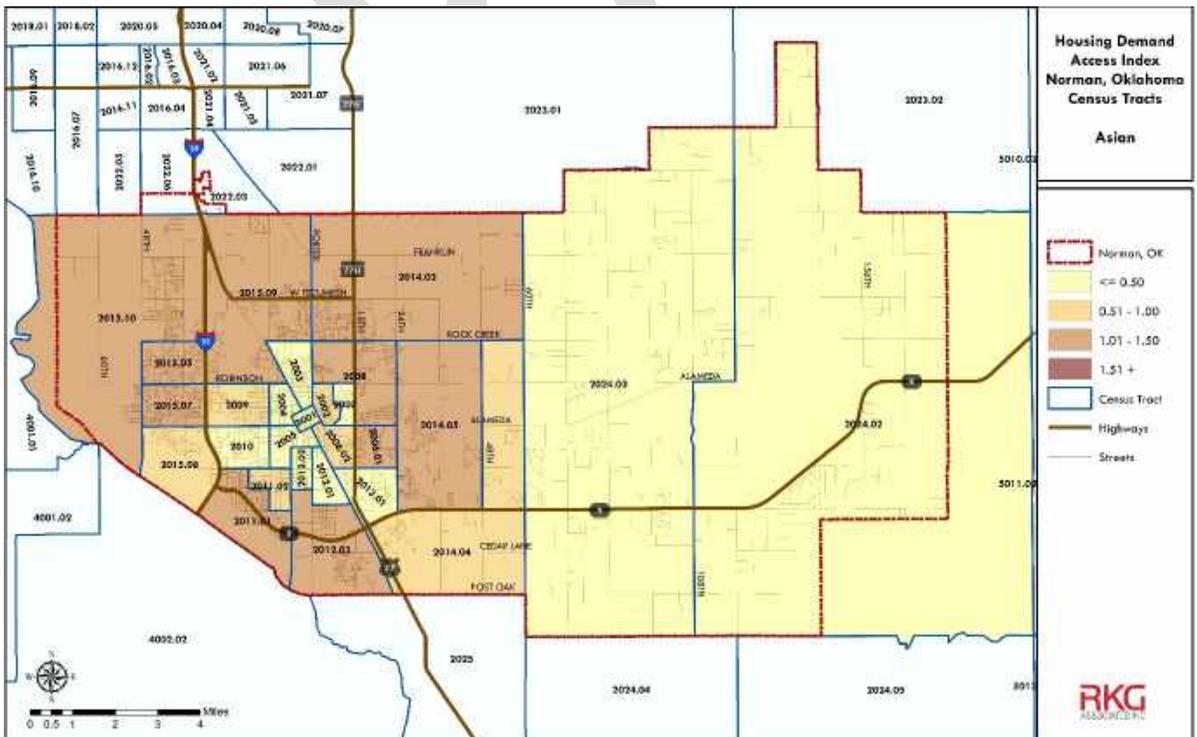
Map 6-2: Mortgage Demand & Access Index (Black)



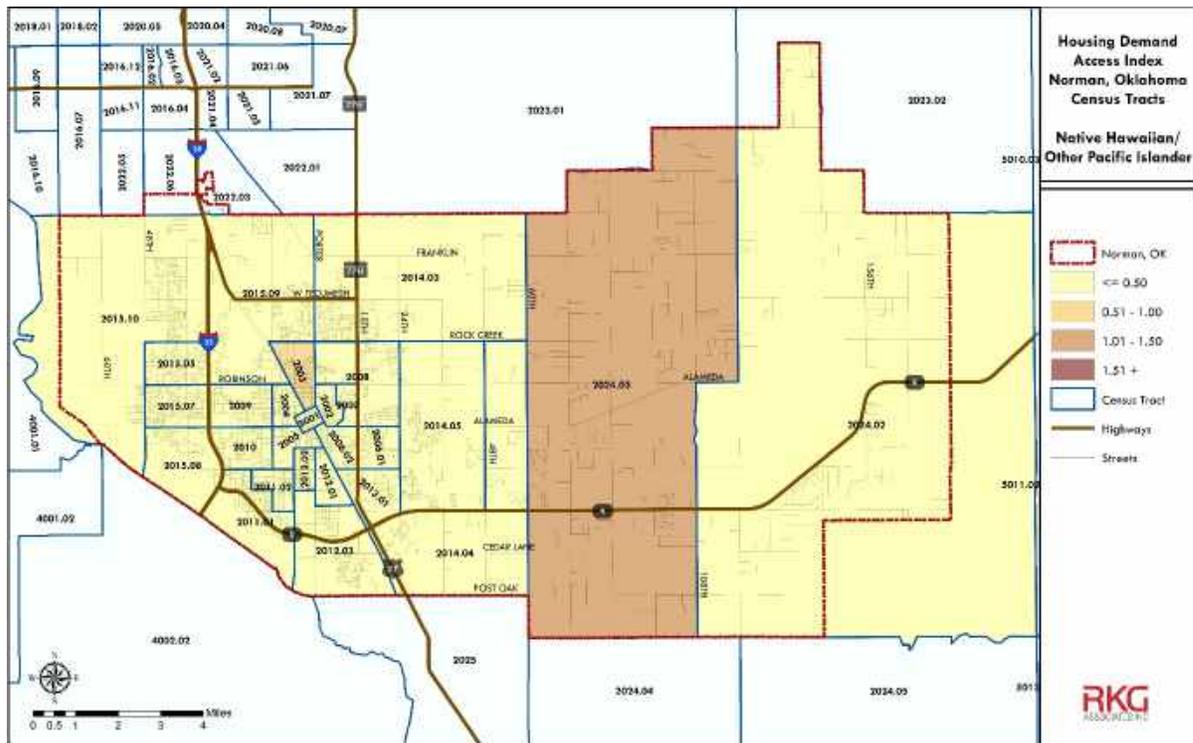
Map 6-3: Mortgage Demand & Access Index (American Indian/Alaska Native)



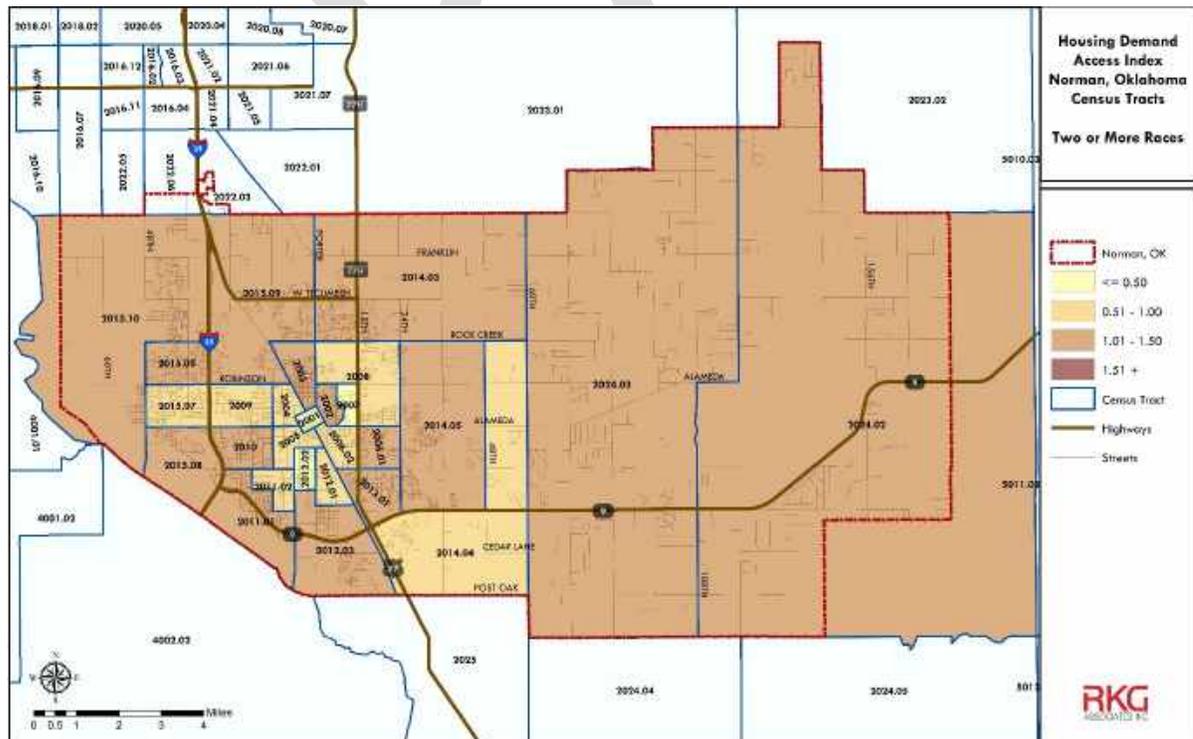
Map 6-4: Mortgage Demand & Access Index (Asian)



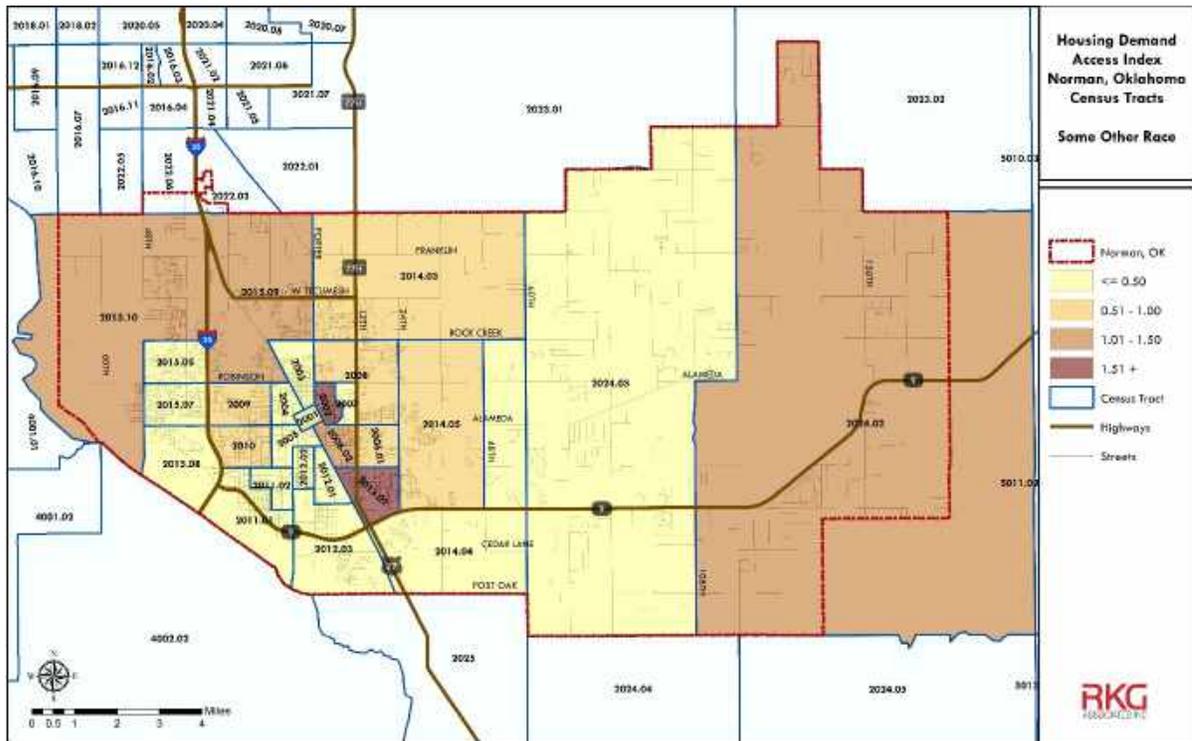
Map 6-5: Mortgage Demand & Access Index (Native Hawaiian/Other Pacific Islander)



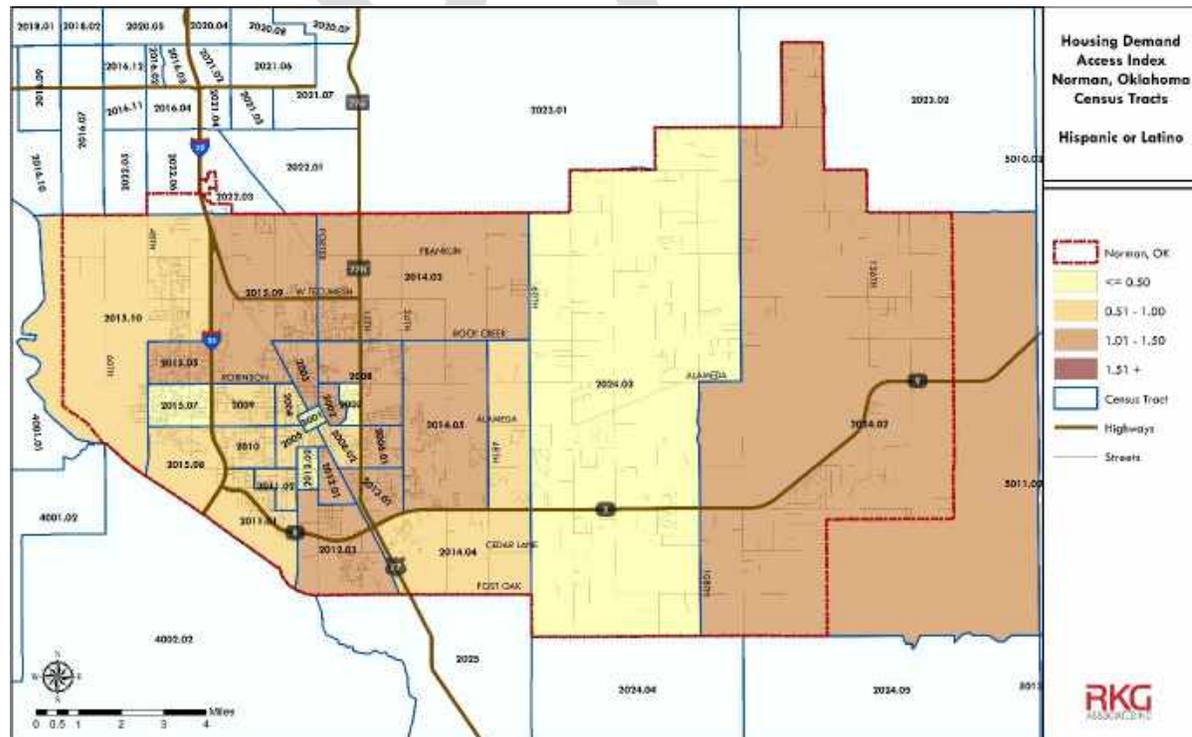
Map 6-6: Mortgage Demand & Access Index (Two or More Races)



Map 6-7: Mortgage Demand & Access Index (Some Other Race)



Map 6-8: Mortgage Demand & Access Index (Hispanic/Latino)



## E. HIGH-COST LENDING

A subprime mortgage is a type of home loan issued to borrowers with low credit scores (often below 600) who are unqualified for conventional mortgages. Subprime mortgages usually come with much higher interest rates and down payments than conventional options because the borrowers often are at higher default risks. However, more expensive subprime loans are sometimes issued to some borrowers with high enough household incomes, credit scores, and available down payments to qualify for conventional loans. Historically, this is especially true for minority groups, which usually see higher percentages of subprime borrowers. The decision and practice of subprime lending targeting borrowers' racial or ethnic status constitute mortgage discrimination.

Since 2005, Housing Mortgage Disclosure Act data has included a new category of information called "rate spread." It represents the difference between the loan interest rate and the prevailing U.S. Treasury standard. Though HMDA does not require lenders to report credit score data of applicants which can be used to determine which loans are subprime, the "rate spread" data can help identify "high-cost" loans, which is a strong predictor of subprime lending and possible mortgage discrimination.

A loan is considered a high-cost loan if it meets one of the following criteria:

- A first-lien loan with an interest rate at least three percentage points higher than the prevailing U.S. Treasury standard at the time the loan application was filed. The standard is equal to the current price of comparable-maturity Treasury securities.
- A second-lien loan with an interest rate of at least five percentage points higher than the standard.

Table 6-8 shows the total cases of high-cost lending by borrowers' racial or ethnic group between 2016 and 2018 in Norman. The citywide average high-cost lending rate for all racial/ethnic groups is 2.04%, which is calculated by comparing the number of high-cost lending cases to the total amount of originated and approved not accepted applications. The high-cost lending rate for each racial and ethnic group is generally low, between 0% and 5.4%. However, borrowers of Some Other Race were more likely to experience high-cost lending during the two years compared to other groups, with the highest high-cost lending rate of 5.3%, followed by the Native Hawaiian/Other Pacific Islander

**Table 6-8**  
**Cumulative High Cost Lendings by Race/Ethnicity, 2016-2018**  
**City of Norman, Oklahoma**

	No. of High Cost Lendings	Total Originated/ Approved Not Accepted Applications	High Cost Lending Rate
White	134	6,505	2.06%
Black	6	197	3.05%
American Indian/Alaska Native	12	366	3.28%
Asian	1	265	0.38%
Native Hawaiian/Other Pacific Islander	1	29	3.45%
Two or More Races	0	0	0.00%
Some Other Race	7	131	5.34%
No Data/Not Applicable	20	1,385	1.44%
Hispanic or Latino*	1	330	0.30%
<b>Total</b>	<b>181</b>	<b>8,878</b>	<b>2.04%</b>

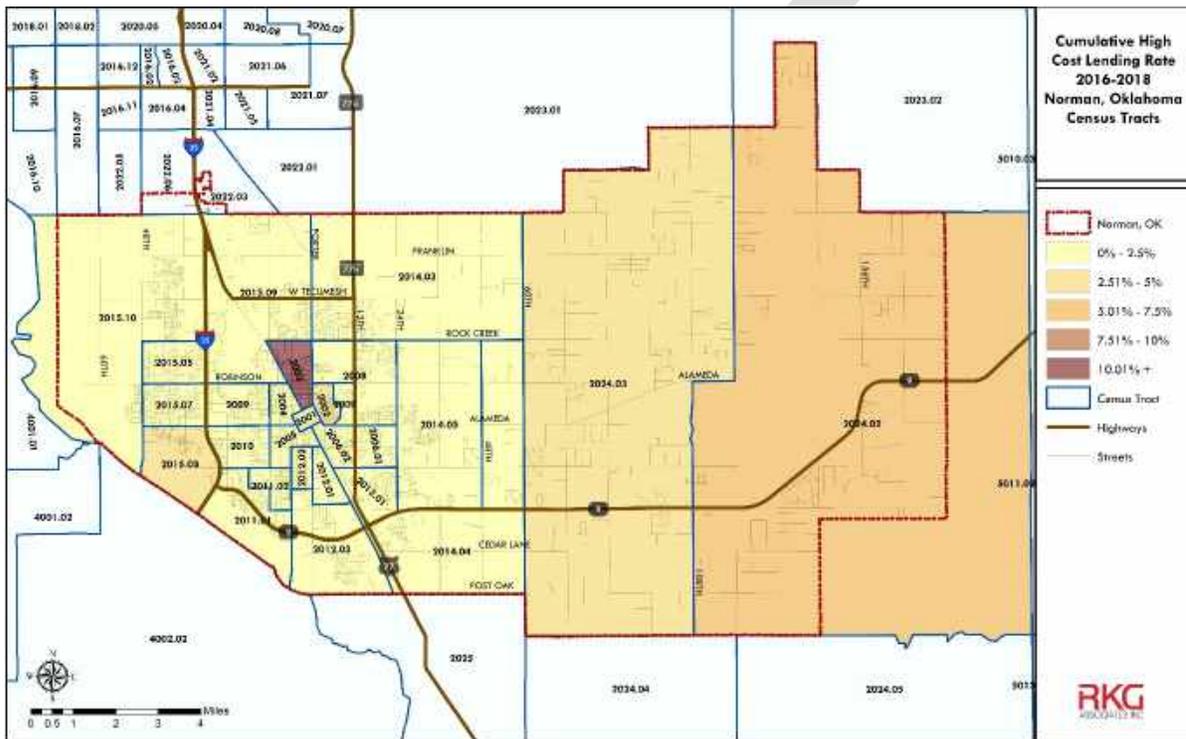
\* Not counted towards the totals

Source: HMDA data and RKG Associates, Inc., 2020

population, the American Indian/Alaska Native borrowers and the Black population, with rates higher than average at 3.5%, 3.3%, and 3.1%, respectively.

The cumulative high-cost lending rates between 2016 and 2018 were then mapped by census tract. Given that the citywide average is 2.0%, the darker shades indicate census tracts that are more likely than others to experience high-cost lending practices. High-cost lending has occurred most often in Census Tract 2003, at the highest rate of 30.3%, which is 15 times the citywide average. This census tract has the highest concentration of the Hispanic population in Norman and is also part of Norman's 2020 CDBG Target Area which has a higher exposure to poverty and less access to opportunities. Census Tract 2024.02 has seen the second highest high-cost lending rate at 7.3% (Map 6-8).

Map 6-8



## F. REAL ESTATE ADVERTISING AND AFFIRMATIVE MARKETING

RKG Associates also examined Realtor websites to assess if real estate brokers and sales offices are providing information supporting people's rights to fair housing choice in their advertising and marketing practices. This assessment also identified potentially discriminatory language used on real estate listing websites in Norman's home sales and rental markets.

In general, major real estate listing services such as Century 21, Zillow/Trulia, Apartments.com, and Coldwell Banker have specific overall statements expressing their support of the principles of the Fair Housing Act and the Equal Opportunity Act. Century 21 prohibits "discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions." Also, each Century 21 Real Estate LLC franchised office is contractually required to comply, in all respects, with all laws, rules and regulations applicable to the real estate industry, including without limitation, the requirements imposed by the Fair Housing Act.

Apartments.com prohibits advertising “any preference, limitation, or discrimination because of race, color, religion, sex, handicap, familial status, or national origin, or intention to make such preference, limitation or discrimination.” Zillow/Trulia has provided a detailed article explaining the basics of the Fair Housing Law (<https://www.zillow.com/rental-manager/resources/fair-housing-guide/>). Coldwell Banker has listed the laws that protect the fair housing rights, the responsibilities of home sellers and real estate professionals, and resources to seek help when the violation of rights occurs.

However, most of Norman’s local real estate agency websites do not have languages or statements related to fair housing. Eight local realties have listed the logo of Equal Housing Opportunity at the bottom of their websites, but have not provided further details, though some of them have listed resources and advice for the home buying process.

## G. HOUSING MARKET OVERVIEW

Residential sales activities, home value, and rent levels are vital indicators of the overall well-being of a community’s housing market, displaying the relations between the housing demand and supply. The RKG team obtained the residential sales data from the Oklahoma City Metropolitan Association of Realtors (MLSOK), and the median home value and the median monthly gross rent data from the American Community Survey 2018 5-Year Estimates to provide an overview of Norman’s housing market.

### 1. Home Value and Sales Trend

The residential sales data indicates that Norman’s total closed home sales have been slightly slowing down between 2017 and 2019, especially since 2018. The total closed sales declined from 2,088 in 2017 to 2,070 in 2018 at a rate of 0.9%, and further down to 2,041 in 2019 at a rate of 1.4%. Most of the closed sales were single-family homes, and this trend has been strengthening during the two years. However, Norman has seen more showings per listing, reduced months of inventory, fewer days of listed properties on market, and narrowing gap between list prices and sales prices. All these factors indicate a higher demand for home buying (Table 6-9). This is likely because though the demand in the home sales market has been rising, the supply of available listings has slightly decreased as not as many people want to sell their homes now, resulting in a slight drop in the total closed sales. If this trend continues, it will likely further drive up the home sales prices in Norman.

**Table 6-9**  
**Residential Sales Activity, 2017-2019**  
**City of Norman, OK**

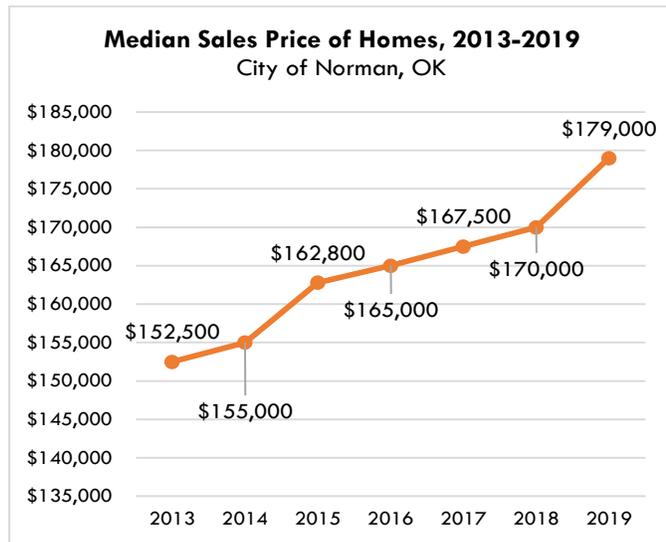
	2017	2018	2019	Annual Percent Change	
				17-'18	18-'19
Total Closed Sales	2,088	2,070	2,041	-0.9%	-1.4%
Percent Single Family	93.6%	94.1%	94.5%	0.5%	0.4%
Percent Townhouse-Condo	6.4%	5.9%	5.5%	-0.5%	-0.4%
Showings Per Listing	3.86	4.56	4.60	18.1%	0.9%
Months of Supply of Inventory	3.9	2.8	2.4	-27.5%	-14.3%
Days on Market	56	56	51	0.0%	-8.9%
Pct. of List Price Received	97.7%	97.6%	97.8%	-0.1%	0.2%

Source: MLSOK and RKG Associates, Inc., 2020

This is further supported by the upward trend in the median sales price of homes between 2013 and 2019 in the City of Norman (Figure 6-2). The median sales price rose from \$152,500 in 2013 to \$179,000 in 2019, gaining by 17.4%, which is 2.9% annually. It also shows a much steeper growth between 2018 and 2019 at 5.3%, indicating that the tightening supply is pushing up residential sales prices in Norman.

According to the 2018 American Community Survey (ACS) 5-Year Estimates, the median home value in Norman increased by 14.9% between 2013 and 2018, or 3% per year (Table 6-10). This corresponds with the upward trend of the median sales price of homes as discussed, and it also shows that the median home value in Norman has accelerated slightly faster than the growth of median household income annually between 2013 and 2018. This trend should be a concern for affordable housing advocates as real estate values start to outpace incomes, but median household incomes have kept pace.

Figure 6-2



Source: MLSOK and RKG Associates, Inc., 2020

Table 6-10

**Median Home Value, Gross Rent and Household Income, 2013-2018  
 City of Norman, OK**

	Median Home Value	Median Gross Rent	Median HH Income
2013	\$152,100	\$763	\$49,038
2014	\$154,700	\$780	\$50,714
2015	\$160,100	\$788	\$51,491
2016	\$163,900	\$802	\$52,484
2017	\$169,700	\$835	\$53,733
2018	\$174,700	\$857	\$56,229
Change '13-'18	\$22,600	\$94	\$7,191
Ann. % Chg. '13-'18	2.97%	2.46%	2.93%

Source: 2018 ACS 5-Year Estimates and RKG Associates, Inc., 2020

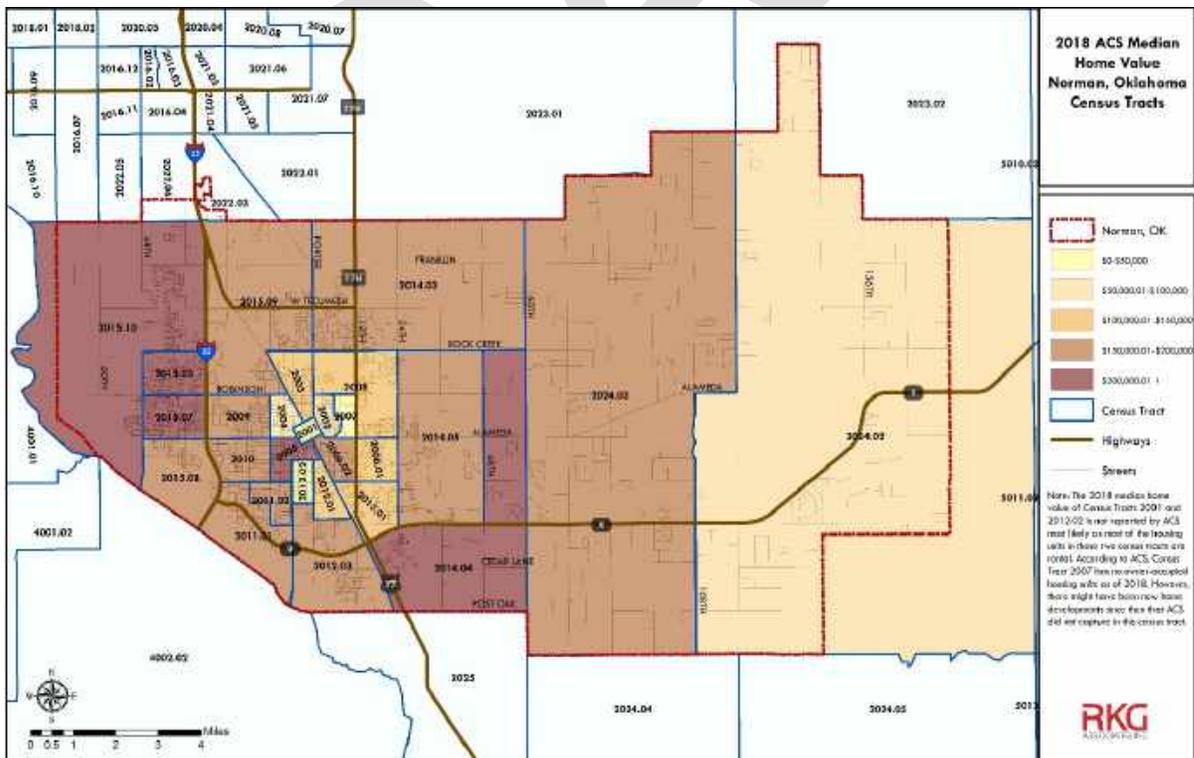
Map 6-9 and Map 6-10 display the 2018 median home values and the annual percentage changes of median home value between 2013 and 2018 by census tract in Norman. The data was also obtained from the 2018 American Community Survey 5-Year Estimates. Note that the 2018 median home values of Census Tracts 2001, 2007, and 2012.02 are not reported by the 2018 American Community Survey 5-Year Estimates. This is likely because the majority of the housing units in Census Tracts 2001 and 2012.02 are rental, and according to ACS, there is no ownership housing unit in Census Tract 2007, though ACS likely has not captured the new housing developments in Census Tract 2007 since then.

Apart from these three census tracts, the median values of homes are generally lower in neighborhoods around the urban area center where there are higher proportions of Section 8 voucher units and publicly assisted housing programs, as well as in the rural Census Tract 2024.02, which has the second highest high-cost lending rate.

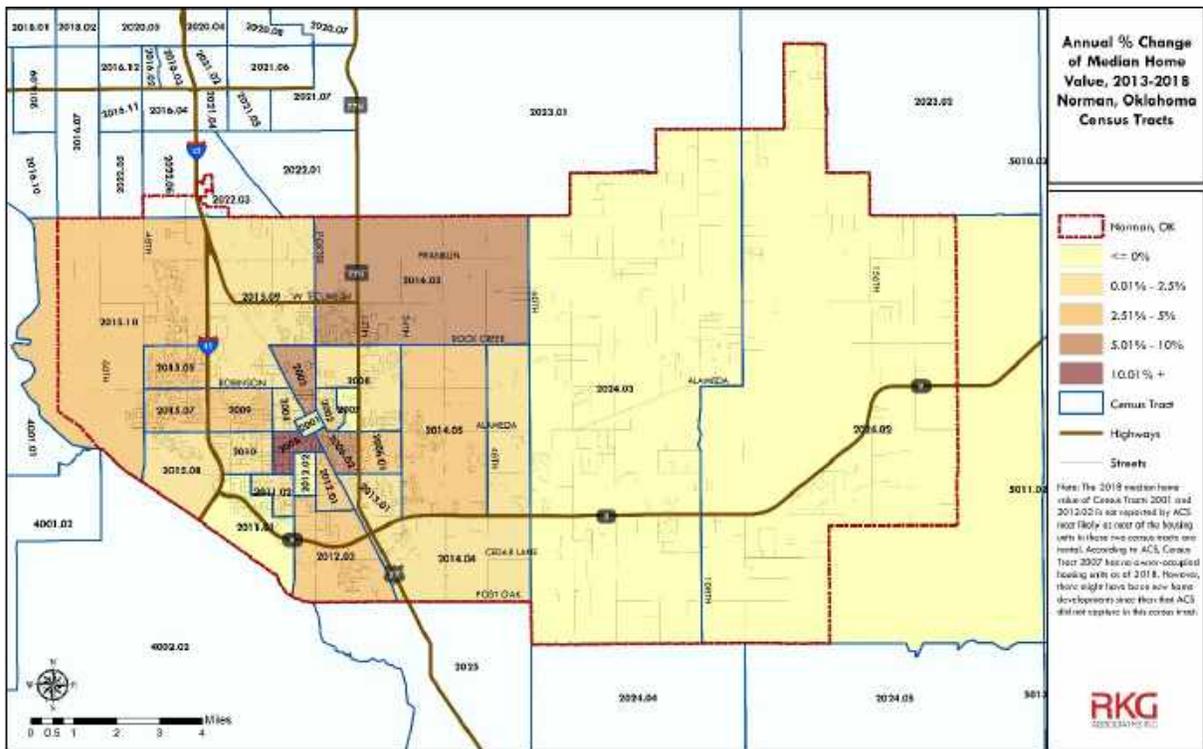
However, though part of the Census Tract 2005 is within the City's 2020 Community Development Block Grants (CDBG) Target Area which is categorized as the low- and moderate-income neighborhood, this census tract has the fifth-highest median home value in 2018. It has also seen the steepest median home value growth in the City between 2013 and 2018, at an annual rate of 12.36%. Two other CDBG Target Area Census Tracts 2006.02 and 2003 have experienced a similar trend, with their median home values gaining the second and the third fastest in the City at a rate of 7.18% and 6.28% per year, respectively.

The rapid acceleration of the median home values in Census Tracts 2005 and 2006.02 which are adjacent to the University of Oklahoma campus is likely due to the heating student housing market that incentivizes owners to convert ownership housing into student rental units, which is a trend observed in the City. The University of Oklahoma is also one of the biggest employers in Norman, likely adding the housing needs of university staff to this area. In addition, Census Tract 2003 currently has the highest concentration of the Hispanic population, the highest high-cost lending rate, and more exposure to poverty than other parts of the City. Its median home value acceleration between 2013 and 2018 is likely related to the neighborhood's proximity to Norman's employment centers and commercial/business districts on the northwest side of the City. The fast increase of median home values in these CDBG Target Area census tracts will likely further pressure their most vulnerable residents in terms of access to fair housing opportunities.

Map 6-9



Map 6-10



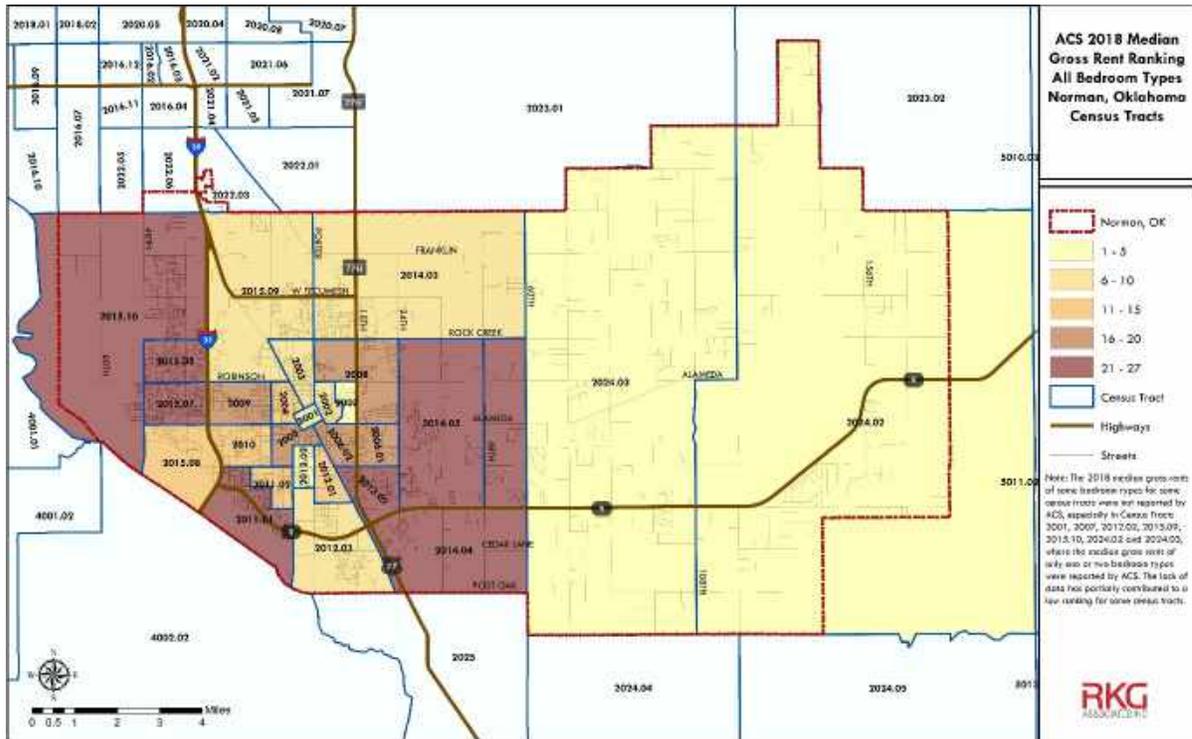
## 2. Rental Rate Overview

Table 6-10 shows that the citywide median gross rent in Norman between 2013 and 2018 rose by 12.3%, or 2.5% annually. This is slower than the growth of the median household income in the City, which increased by 14.7% during those five years, or 2.9% per year, indicating a relatively healthy rental market in Norman.

RKG also adopted a ranking method to show which neighborhoods in the City have higher rent rates considering all bedroom types. All census tracts with available median gross rent data were ranked and received scores from one to twenty-seven based on their median gross rents from low to high under each bedroom type. If the median gross rent for a certain bedroom type is not available in a census tract, then it received a score of zero. The total score of all bedroom types was then summed for each census tract, which was ranked again based on its total score.

The results were mapped by census tract, with darker shades indicating higher total scores, and therefore, higher median gross rent levels considering all bedroom types. Census Tracts 2015.10, 2015.05, 2015.07, 2014.04, 2014.05, 2013.01, and 2011.01 which are in the northwest, south, and southeast edges of the urban area along I-35 and Highway 9 most likely have the least affordable rental market according to the ACS 2018 5-Year Estimates (Map 6-11). This generally aligns with the neighborhoods which have seen the highest 2018 median home values and the fastest population gains between 2010 and 2024.

Map 6-11



# 7 IMPEDIMENTS TO FAIR HOUSING CHOICE

This section summarizes the impediments to fair housing choice in Norman found in the previous chapters of this analysis and proposes recommendations to the City to address such impediments.

## A. HOUSING AND SOCIAL SERVICE ORGANIZATION INTERVIEWS

The consultant spoke with eight housing- and service-related organizations in the Cleveland County service area between June and July of 2020. The purpose of the interviews was to understand the current capacity of these organizations versus the existing housing demand and to identify impediments to fair housing. All these organizations serve Cleveland County or smaller areas that include the City of Norman. Topics discussed include affordable housing development, housing-related services, and fair housing issues. The seven interviewed organizations include:

- Aging Services, Inc.
- Cleveland County Habitat for Humanity
- Metropolitan Fair Housing Council of Oklahoma, Inc.
- Norman/Cleveland County Continuum of Care
- Central Oklahoma Community Action Agency
- Oklahoma Housing Finance Agency
- Neighborhood Housing Services Oklahoma
- Norman Housing Authority

### 1. Affordable Housing Development

- 99% of the applicants for affordable housing in Cleveland County have incomes 80% of AMI or below in 3-to-4-person households.
- Most of these applicants are white, followed by black, Hispanic, and the Native American population.
- Not all affordable housing development organizations have access to federal or state funding. Some have very limited capacity and funding compared to the high demand as most existing funding sources, including the federal funding, are limited to disaster areas and rebuilding, especially after the 2013 tornado. In this instance, 70% of the affordable home development costs rely on various private funding sources.
- Though state funding has remained, federal funding has decreased in recent years.
- The current application/demand for low-income housing tax credits is usually three to four times the funds available each year.
- Fundraising takes the longest during the development process and thus has hindered the capacity to build more affordable housing.
- The increasing development cost is another challenge as construction costs have increased by 13% in recent years.

- There are desperate housing needs mostly for the low-to-moderate-income population (60% of AMI and below) who do not qualify for most mortgages, and especially the low-income population who do not qualify for any type of mortgage.
- One interviewed organization can build one home per year though they receive 50 to 60 applications annually. They estimated that they would need over \$2 million in additional funding per year to build enough affordable ownership homes for all qualified applicants in the County.
- Demand for housing in Oklahoma has always outpaced the availability. There have been more applications/needs for affordable rental housing than ownership housing in general.
- Many families are forced to rent though they want to own homes because there are limited affordable homes available and many applicants' credit scores are not high enough for mortgage applications.
- Developers have not been able to build affordable housing fast enough to catch up with the demand for both ownership and rental housing.
- Interviewees hope to expand their partnership with the City of Norman, for example in terms of vacant home/land donation from the City, funding for land purchases, and partnership to build more affordable housing projects.
- The majority of the public housing units in Norman are 100% occupied with little turnover. More demands are for the Section 8 voucher programs, especially due to the COVID-19 pandemic. The need for housing assistance has skyrocketed since the pandemic, but as no one is likely to move out from Section 8 units, applicants on the current waiting list are not likely to be housed for the next year. It is estimated that the addition of \$2 million of funding per year is needed to house the 500 applicants on the current waiting list.
- The lack of and demand for affordable one-bedroom units that serve the nonelderly/non-disabled population have been consistent. Developers have not been incentivized to build affordable one-bedroom units as they are not as profitable as larger units with more bedrooms.

## **2. Housing-Related Services**

- There have been demands for major home repair services (1-4 requests per week) for the low-and-moderate-income population in Cleveland County, especially in rural areas, but local organizations do not have the capacity to serve.
- There has been demand from seniors for more transit services with expanded routes, especially outside the city boundary of Norman and in rural areas. There is also an unmet need for transit routes connecting the City of Norman and the City of Moore for seniors.
- More funding is also needed to expand the home repair, housekeeping, and other related household services for seniors to catch up with the demand, which is estimated to require at least \$150,000.
- While most seniors currently prefer to age in place, this has become challenging due to unmet demands for housing-related services.
- If there are more affordable senior living options, more seniors would likely choose to live in senior housing.
- There have been around 30 requests for individual rent assistance over the past seven months in Cleveland County.
- The demand for rent and utility assistance has been the highest compared to other services as most applicants are unemployed.
- There have been more female applicants who are single that need rent/utility/other housing-related services.

- Funding for rent and utility assistance usually is expended very quickly once it becomes available.

### **3. Fair Housing Issues**

- Though the current capacity is enough to help resolve fair housing issues, education and awareness outreach regarding tenants' rights, federal housing laws, and ordinances are important as they help to prevent fair housing issues before they occur.
- More funding is needed to conduct direct contact and education as a lot of the low-income population do not have direct access to the internet.
- There is also a need for self-help services and mediation/legal services for the "working poor" population who do not qualify for low-income benefits. More resources are needed to provide such services that currently do not exist.

#### **B. DEMAND EXCEEDS SUPPLY FOR SECTION 8 VOUCHER PROGRAM**

The City of Norman identifies the availability of funds as the primary obstacle in meeting the underserved needs of low-income and moderate-income populations. The Norman Housing Authority provides Section 8 housing assistance. Though compared to the 2015 baseline Section 8 voucher allocation of 1,185, Norman's current Section 8 vouchers have increased to 1,299, there are still 524 applicants on the Section 8 waiting list indicating a continuing demand for the Section 8 program and units. In addition, there has been little turnover, especially since the COVID-19 pandemic while needs for housing assistance significantly increase, widening the supply-demand gap for affordable housing in general and the Section 8 voucher program.

Though the current federal funding for Norman's Section 8 housing program increased by approximately 26% since the 2015 AI, the applicants on the waiting list have also gone up by 42%. The City should continue utilizing the housing delivery system which the City has had in place for many years, including resources such as homeownership and housing rehabilitation opportunities for low- to moderate-income families, as well as leveraging private dollars and various funding sources.

#### **C. LIMITED CAPACITY TO INCREASE SUPPLY OF AFFORDABLE HOUSING**

Though since the 2015 AI, the CDBG and HOME funds that Norman received have risen by 14.3% and 17.9% respectively, the challenge of limited organizational capacity to increase the supply of affordable housing due to a lack of nonprofit-based housing development organizations persists.

A new Community Housing Development Corporation, CHDO 2015, was established in 2015 and has been developing affordable housing units in partnership with the Norman Affordable Housing Corporation. However, it is still effectively the only CHDO in the City with any real organizational capacity or experience in the provision of affordable housing. In addition, it has a limited capacity as it currently has one employee according to the City. In a City the size of Norman (125,369 pop.), this lack of organizational depth in affordable housing development still imposes an impediment to the fair housing opportunities in Norman. The City should consider developing a mechanism to expand partnerships with neighborhood-based and regional nonprofit developers (such as Neighborhood Housing Services Oklahoma) or religious-affiliated organizations to address these issues and to provide support for these organizations.

#### **D. CONCENTRATION OF MINORITY POPULATIONS IN LOWER INCOME AREAS WITH LIMITED ACCESS TO RESOURCES AND OPPORTUNITIES**

Norman's population continues to become more diverse since the 2015 AI, in particular with a growing Hispanic population. The concentrations of the Hispanic and the minority population still align with neighborhoods with higher exposure to poverty, and fewer resources and access to opportunities. The Black, Native American, and the Hispanic population have lower scores for many of the HUD Indexes. The Hispanic population also constitutes the second largest immigrant group in Norman, with many of them having limited English proficiency.

According to RKG's census tract analysis, Census Tracts 2002, 2003, 2004, and 2006.01 around the City's urban center are exhibiting conditions of higher poverty, concentrations of Hispanic and minority households, and housing condition problems. This may be partially due to the limited affordable housing choices in other parts of the City. The 2018 PlanNorman has made progress by setting policies to promote a diversity of housing types to accommodate residents of various races, incomes, household sizes, lifestyles, ages, and levels of ability and mobility throughout the City. The City should continue the momentum and intervene with services and investments to improve conditions for the Hispanic and minority households in this part of the community. The City should also increase quality affordable housing options in other parts of the City to allow for more fair housing choices citywide for the Hispanic and the minority population.

#### **E. LIMITED ACCESS TO RESOURCES AND OPPORTUNITIES IN PUBLICLY SUPPORTED HOUSING NEIGHBORHOODS**

The Low Poverty Index, Labor Market Engagement Index, and Environmental Health Index all show lower scores for census tracts with concentrations of Section 8 Voucher households and publicly supported housing programs compared to the rest of the City. HUD discourages its recipients from targeting its CDBG funds in a way that encourages such conditions.

As the City recognizes the need for increasing the financial support for community-based, nonprofit organizations directly serving this population, the City should continue to seek additional funding sources, and expand partnerships with regional nonprofit organizations to increase the capacity of employment and housing support. In addition, the City can explore alternative approaches such as zoning revisions to require and incentivize citywide developer contributions to public improvements targeting these neighborhoods (such as tree planting, sidewalk constructions, etc.).

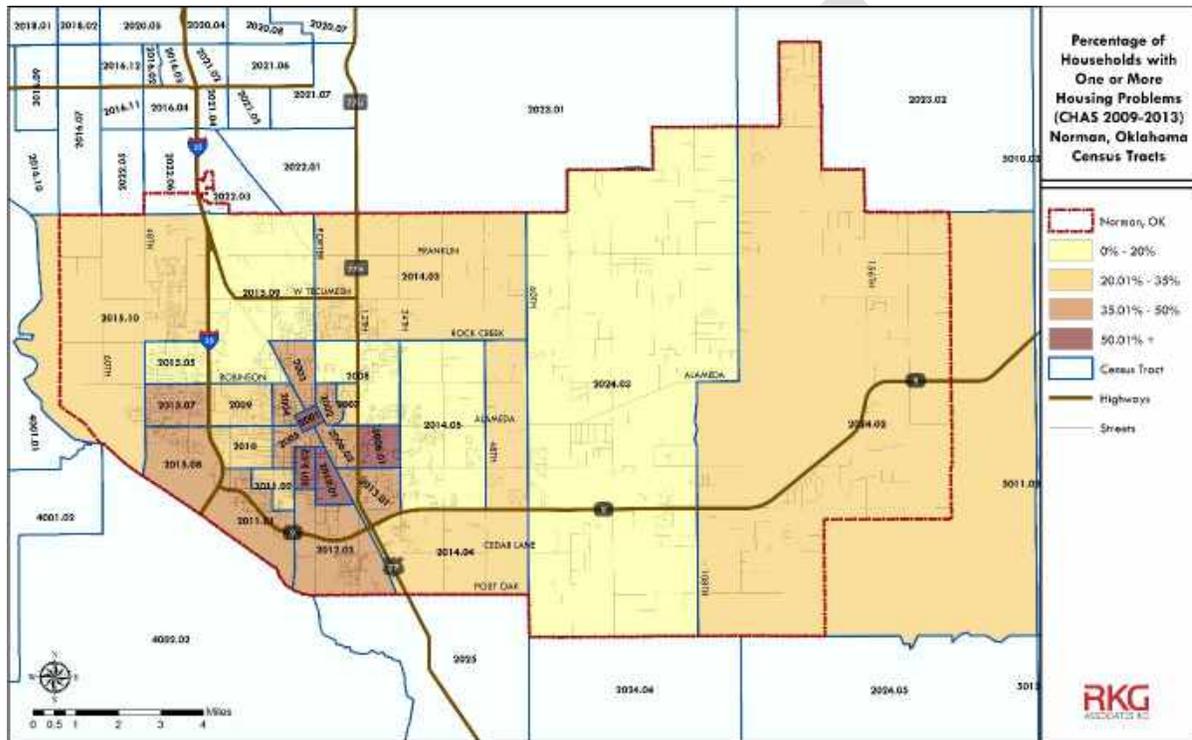
#### **F. HOUSING CONDITION PROBLEMS IN SOME NEIGHBORHOODS**

As discussed in the chapter of Demographic and Housing Condition Analysis, neighborhoods with a concentration of Section 8 Voucher households and publicly supported housing programs in Norman have seen higher percentages of their housing units with one or more housing condition issues. These housing units are also especially susceptible to natural disasters such as tornados, which are common in the State of Oklahoma. This finding might point to the need for expanding the CDBG-funded housing rehabilitation program – not only to improve publicly-assisted dwelling units but other units including rental units occupied by low- and moderate-income households and individuals. The City's current housing rehabilitation program is only intended to help correct code violations for owner-occupied units instead of major repair or remodeling. However, findings from the stakeholder interviews indicate a large demand for major repair services that interviewed organizations currently have no capacity to serve. In addition, neighborhoods with higher rates of housing condition problems have large proportions of renter-occupied units that do not qualify for the housing rehabilitation program. The

City should consider including major repair and remodeling services for both ownership and rental units into the program, especially for low- and moderate-income households.

Neighborhoods in and around the urban area center are showing signs of blight that, if left unchecked, will negatively impact the economic vitality of the community (Map 7-1). Housing units in these areas are also more likely to be impacted by natural disasters and climate change, further increasing the risk of financial distress and homelessness, especially for the most vulnerable population. This situation can potentially provide an opportunity for the City to leverage resources to upgrade both owner- and renter-occupied housing especially for low- and moderate-income households.

Map 7-1



## G. LENDING POLICIES AND PRACTICES

One indication of a barrier to fair housing may be the denial rate for conventional home purchase loans. Although differences in denial rates for whites and minorities may be due to legitimate factors such as income or credit history, a portion of the disparity may be attributable to the persistence of discrimination among certain lenders. Another indicator may be high-cost lending practices that target the minority lenders. According to RKG's analysis, high-cost lending has occurred most often in Census Tract 2003, at a rate of 30.27%, which is 15 times the citywide average. This census tract also has the highest concentration of the Hispanic population in Norman and is also part of Norman's 2020 CDBG Target Area which has a higher exposure to poverty and less access to opportunities.

The City should investigate this issue and provide legal and financial support to detect and combat potential discrimination in private lending practices. For example, the City should expand fair housing and homebuying education efforts and consider establishing a reporting system for private lending discrimination complaints.

## **H. SHORTAGE OF AFFORDABLE HOMEOWNERSHIP HOUSING**

The City of Norman's housing values continue to increase since the 2015 AI, which may make it difficult for lower-income persons to become homeowners. As of 2013, the median value of a home in the City of Norman was \$155,300. The housing market has continued to heat up since then, and according to the ACS, median home values in Norman rose to \$174,700 in 2018.

The City of Norman supports a range of services and programs that meet the needs of low- and moderate-income households, including the "Development of Affordable Housing Program" and the "Owner Occupied Housing Rehabilitation Program." The City's 2018 PlanNorman also states providing "housing affordable to low-income residents as well as aging residents to achieve an equitable and inclusive Norman" as one of its guiding principles. Future planning and development activities should follow this principle to increase the ownership rate among the low- and moderate-income population.

## **I. SHORTAGE OF AFFORDABLE RENTAL HOUSING**

The considerable demand from Norman's undergraduate student population has probably contributed significantly to a shortage of extremely low-income units in Norman. Nonetheless, housing shortages for this category are common for many, if not most, jurisdictions, since the provision of housing for this income cohort often requires public sector subsidies which have been limited.

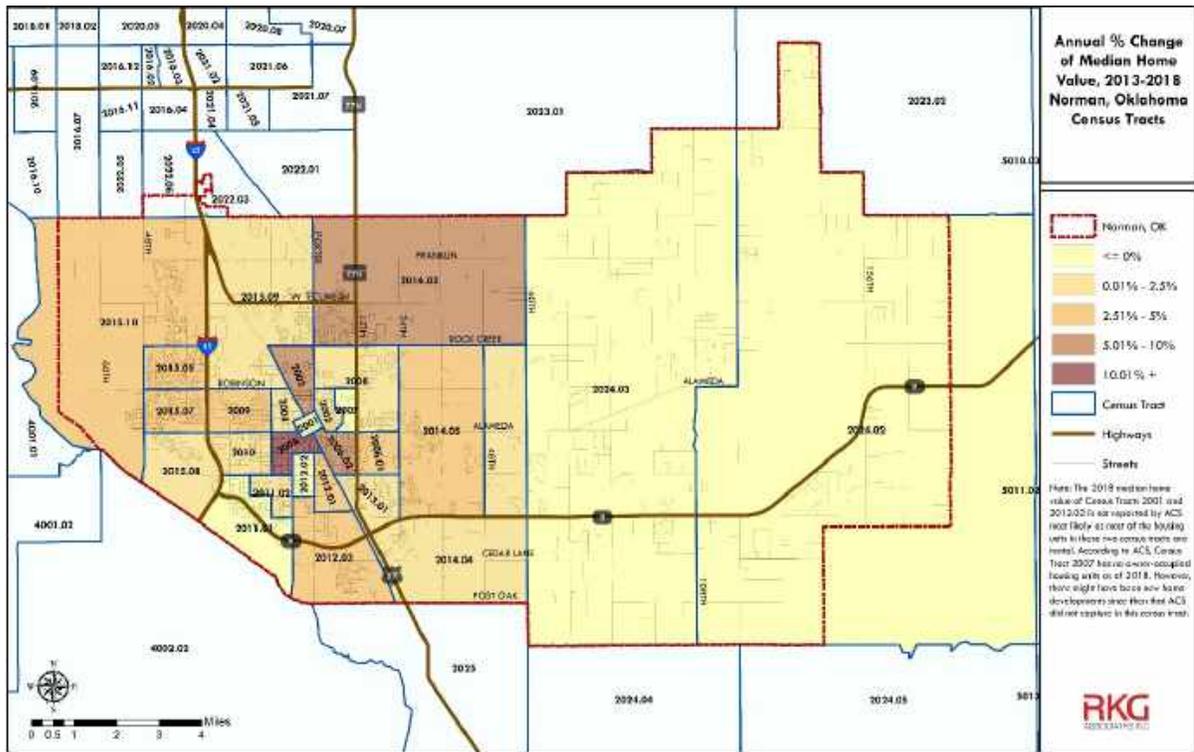
The City has continued to experience a surge in student rental units and a heated housing market around the University of Oklahoma campus. According to the data from Norman's 2020-2024 Consolidated Plan, currently, there are 31,000 students enrolled at the Norman location of the University of Oklahoma, and approximately two-thirds of them live off campus in rental units. It is anecdotally observed that low- and moderate-income housing has been constantly competing with the student housing market. There are incentives for owners to convert their properties for student renters, and for developers to build more student-oriented projects that are often more profitable. The City should consider freeing up the housing stock for non-student households. HOME funding should be utilized alone or in conjunction with other funding sources to purchase, rehabilitate, or construct units as rental housing for the non-student population at or below 80% of Median Family Income.

## **J. RISING HOME VALUES IN SOME TARGET NEIGHBORHOODS**

As discussed in the previous section, though part of the Census Tract 2005 is within the City's Community Development Block Grants (CDBG) Target Area, this census tract has the fifth-highest median home value in 2018 according to ACS. It has also experienced the fastest growth of median home value between 2013 and 2018 by 12.36% annually. Census Tracts 2006.02 and 2003 that are also within the Target Neighborhoods have experienced a similar trend, with their median home values rising with the second and the third-highest rates of 7.18% and 6.28% per year, respectively (Map 7-2).

The rapid acceleration of the median home values in these Target Neighborhoods may be partially related to the active student housing market, as Census Tracts 2005 and 2006.02 are adjacent to the University of Oklahoma campus. The fast increase of median home values in these census tracts will likely further limit homeownership opportunities, and even create involuntary displacement for the low- and moderate-income population. The City should continue to invest and partner with various non-profit organizations to stabilize the housing stock in these neighborhoods and prevent involuntary displacement.

Map 7-2



**K. LIMITED SUPPLY OF HOUSING FOR PERSONS WITH DISABILITIES**

Disability is the second most common basis for housing discrimination complaints, accounting for 31.4% of all complaints originated in Norman between 2015 and 2019. The most common disabilities cited in Norman are ambulatory difficulties and cognitive problems, inflicting 5.6% and 5.1% of the total population in 2013 according to HUD. These needs may require increasing the provision of housing that is specifically designed to meet ADA standards to accommodate people with ambulatory or other physical disabilities, in addition to providing supportive services. Cognitive issues could be impacting elderly residents at a higher rate, or there may be housing needs related to the group of people with cognitive or learning disabilities. Norman’s population is also aging, following a national trend, with the percentage of its population aged 65 and older rising from 10.0% in 2010 to 13.1% in 2019 according to ESRI. Based on the information gathered from stakeholder interviews, a lot of the City’s elderly residents still live in old housing units that often need accessibility modifications. The 2018 PlanNorman also acknowledges the need of providing various housing choices for the City’s aging population.

The City should expand public/private partnerships to obtain property to increase the accessible, affordable, housing stock, continue to provide accessibility modification services through the CDBG funds, and increase support for community-based nonprofit organizations that provide housing-related services to this population.

**L. INCREASE FAIR HOUSING EDUCATION AND ENCOURAGE REAL ESTATE SALES AND PROPERTY MANAGEMENT COMPANIES TO INCLUDE FAIR HOUSING LANGUAGE IN REAL ESTATE LISTINGS**

Based on RKG's review of the real estate websites, it appears that most of Norman's real estate firms engaged in the sale and rental of residential properties do not promote statements in accordance with fair housing laws. The National Association of Realtors requires that their members adhere to the following practices:

- Provide equal professional service without regard to the race, color, religion, gender (sex), disability (handicap), familial status, national origin, sexual orientation, or gender identity of any prospective client, customer, or of the residents of any community.
- Keep informed about fair housing law and practices, improving my clients' and customers' opportunities and my business.
- Develop advertising that indicates that everyone is welcome, and no one is excluded; expanding my client's and customer's opportunities to see, buy, or lease property.
- Inform clients and customers about their rights and responsibilities under the fair housing laws by providing brochures and other information.
- Document efforts to provide professional service, which will assist members in becoming more responsive and successful REALTORS.
- Refuse to tolerate non-compliance.
- Learn about those who are different from me and celebrate those differences.
- Take a positive approach to fair housing practices and aspire to follow the spirit as well as the letter of the law.
- Develop and implement fair housing practices for my firm to carry out the spirit of this declaration.

The City of Norman, in cooperation with the Metropolitan Council on Fair Housing, should provide annual reminders to Realtors and property management firms that they should promote Fair Housing practices and provide affirmative statements in their marketing materials, brochures, website, and all their real estate listings.

In addition, the City has seen an increase in housing discrimination complaints generated between 2017 and 2019, with complaints related to Renters' Rights and Disability issues being the most prevalent. More funding is needed to conduct direct outreach and education on Fair Housing Issues, including tenant rights, for both tenants and landlords, as a lot of the low-income population do not have direct access to the internet. There is also a need for self-help services and mediation/legal services for the "working poor" population who do not qualify for low-income benefits. More resources are needed to provide such services that currently do not exist.