

# Clayton County Community Development HUD Programs Division



## Assessment of Fair Housing Study (AFH)

Program Years 2017 ~ 2021

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# **Clayton County Assessment of Fair Housing**

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**1. Submission date:** 2017

**2. Submitter name:** Clayton County, Georgia

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**5. For PHAs, Jurisdiction in which the program participant is located:** N/A

**6. Submitter members (if applicable):** N/A

**7. Lead submitter contact information:**

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**e. City:** Jonesboro

**f. State:** Georgia

**g. Zip code:** 30236

**8. Period covered by this assessment:** Program Years 2017 – 2021

**9. Initial, amended, or renewal AFH:** Initial Assessment

**10.** To the best of its knowledge and belief, the statements and information contained herein are true, accurate, and complete and the program participant has developed this AFH in compliance with the requirements of 24 C.F.R. §§ 5.150-5.180 or comparable replacement regulations of the Department of Housing and Urban Development;

**11.** The program participant will take meaningful actions to further the goals identified in its AFH conducted in accordance with the requirements in §§ 5.150 through 5.180 and 24 C.F.R. §§ 91.225(a)(1), 91.325(a)(1), 91.425(a)(1), 570.487(b)(1), 570.601, 903.7(o), and 903.15(d), as applicable. All Joint and Regional Participants are bound by the certification, except that

some of the analysis, goals or priorities included in the AFH may only apply to an individual program participant as expressly stated in the AFH.

(Signature Page)

**12.** HUD Departmental acceptance or non-acceptance:

## II. Executive Summary

**Summarize the fair housing issues, significant contributing factors, and goals. Also include an overview of the process and analysis to reach the goals.**

Clayton County, Georgia is a suburban county just south of Atlanta. It has a population of 279,472 as of the 2016 Population Estimates based on the 2010 Census. It is a relatively small county by Georgia standards; being the third smallest in the state and covering 144 square miles. It was incorporated in 1858, and is governed by a Board of Commissioners serving staggered four-year terms and serving each of the four county districts. Residents also elect one full-time chairman. It is considered part of the Atlanta-Sandy Springs-Roswell, GA Metropolitan Statistical Area. The County seat is Jonesboro.

The County is increasingly becoming more diverse in its racial and ethnic makeup. Thirty years ago, the racial and ethnic composition closely mirrored the rest of the region. Today, Clayton County's population has shifted significantly and is increasingly diverse. The biggest changes have been a decline in the white, non-Hispanic population (14.24%), accompanied by a marked increase in the Black, non-Hispanic population (64.91%) as well as in the Hispanic (13.72%) and Asian (over 5%) populations. With the growth in more diverse groups making the County their home, it is imperative that the County increase its efforts at outreach to Limited English Proficiency (LEP) to ensure fair housing choice.

Clayton County is home to Hartsfield-Jackson International Airport. While the airport is a major economic driver in the region, many of the benefits have not filtered significantly into the County. Given its location in the northern part of the County, much of the economic activity tends to have deeper connections and flows north to the City of Atlanta. While the County has been increasingly involved in regional economic development goal-setting and planning, it will endeavor to become even more active as the work of the Community Improvement Districts (CID), and more specifically, the Aerotropolis CID serving the area around the airport. Increasing the economic activity that flows from these efforts to the County, and positioning Clayton County as a welcoming partner to businesses and industry serving the airport will be a vitally important part of increasing access to opportunity for Clayton County residents.

The economic downturn in 2008-2009 took a particularly hard toll on the Clayton County. Due to recession and subsequent housing market turmoil, Clayton County was at one point one of the places in the U.S. with the highest foreclosure rates in housing. Housing prices plummeted, leaving many residents with underwater mortgages, and the general economic climate left many finding it difficult to afford any type of suitable housing. This situation left the door open for outside investors to capitalize on low housing prices and buy properties in bulk; then turning them into rentals often with little investment in upgrades or maintenance. Rents were not significantly less than the mortgages that many people had previously, and in many cases, rose. So, while housing in Clayton County is inexpensive relative to the region as a whole, the economic impacts of job loss and low wages have left many residents housing burdened, thus necessitating more access to affordable housing options. This is not an usual story, but for Clayton County, the after-effects have lingered longer than most communities, with the County just now gaining its footing again and recovering economically.

To add to the difficult situation, Clayton County public schools lost their accreditation in 2008. This was a blow to the efforts to attract new residents and businesses to the County. A new administration was subsequently put in place and the district regained full accreditation in 2012. The repercussions of the

school system's troubles have continued to reverberate, and there is an all-out push by the County to rebrand the schools and disseminate the positive direction the system is now headed.

In addition to the housing and schools setbacks, in 2010, the public transportation that served Clayton County, called C-Tran, ceased operations. By 2014 and through a referendum, the County voted to join MARTA and public bus service resumed. The impacts of the cut to public transportation was particularly acute for the many Clayton County residents that rely on the service to go about their daily activities. Access to jobs, education, and services suffered. With the resumption of service, the burden has been eased, but there is room for improvement.

For Clayton County, the period between 2008 and 2014 felt like a perfect storm that brought any forward progress on housing, economic development, and transportation to a halt. In the intervening years, progress has been made. The goals and implementation strategies that are identified in this report will serve to push progress further and with more urgency. There is an understanding among County staff that to be successful in this endeavor, it will take an interdisciplinary team of staff from various County departments committed to tackling the contributing factors that impede fair housing choice. These departments include but not limited to: Community Development, Economic Development, Planning and Zoning, Police, School Board, and Transportation to name a few. With a concerted effort and common goals, the County can address the most pressing issues facing fair housing.

#### Affirmatively Furthering Fair Housing

Fair housing has long been an important issue in American urban policy – a problem born in discrimination and fueled by growing civil unrest that reached a boiling point in the Civil Rights Movement. The passing of the Fair Housing Act in 1968 was a critical step towards addressing this complex problem – but it was far from a solution. Since the passing of the Act community groups, private business, concerned citizens, and government agencies at all levels have worked earnestly at battling housing discrimination. The Fair Housing Act mandates that the Department of Housing and Urban Development (HUD) ‘affirmatively further fair housing’ through its programs. Towards this end HUD requires funding recipients to undertake fair housing planning (FHP) in order to proactively take steps that will lead to less discriminatory housing markets and better living conditions for minority groups and vulnerable populations. Until recently the Analysis of Impediments to Fair Housing Choice was the primary component of HUD’s fair housing efforts.

On July 16, 2015 HUD published its final rule on affirmatively furthering fair housing (AFFH). Three weeks earlier the U.S. Supreme Court upheld the distinct but related concept of disparate impact liability (*Texas Department of Housing and Community Affairs v. Inclusive Communities Project*).

The procedural aspects of the rule are new, but the fundamental concept is not: the requirement to affirmatively further fair housing is a key provision of the Fair Housing Act, as codified in Title VIII of the Civil Rights Act of 1968 (42 U.S.C. 3608). As a condition of accepting HOME Investment Partnerships Program funding, Community Development Block Grants, McKinney-Vento Homeless Assistance Grants and public housing subsidies, agencies must undertake “meaningful actions... that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.”

The AFFH final rule replaces the existing requirement to conduct an analysis of impediments to fair housing (AI) with that of a new study, the Assessment of Fair Housing (AFH). The new AFH provides

grantees with a uniform template, firmer guidance from HUD, and a host of data and mapping tools to assist them in their fair housing analysis.

The final rule states that a jurisdiction’s “meaningful actions” must:

- address significant disparities in housing needs and access to opportunity,
- replace segregation with truly integrated and balanced living patterns, and
- transform racially/ethnically concentrated areas of poverty into areas of opportunity.

There is no federal expectation for specific outcomes. Instead, agencies have to carefully and thoughtfully carry out the new process.

To carry out the new approach to assessing fair housing issues, Clayton County has reviewed HUD provided data and mapping tools, has undertaken an extensive community outreach and input process, and has worked across County departments to identify the most pressing contributing factors to fair housing issues facing residents to develop a set of eight goals to address them.

In the new approach, the County was required to consider a set of fair housing issues along with pre-determined contributing factors that are detrimental to fair housing choice. The County was also required to use the data and analysis to prioritize the contributing factors most relevant to fair housing issues in Clayton County. The table below lists the priority factors and how they relate to fair housing issues.

Fair Housing Issue	Contributing Factors
Segregation	<ul style="list-style-type: none"> <li>● Location and type of public housing</li> <li>● Displacement of residents due to economic pressures</li> <li>● Loss of affordable housing</li> <li>● Lack of community revitalization strategy</li> </ul>
R/ECAPs	<ul style="list-style-type: none"> <li>● Location and type of public housing</li> <li>● Displacement of residents due to economic pressures</li> <li>● Lending discrimination</li> <li>● Private discrimination</li> </ul>
Disparity in Access to Opportunity	<ul style="list-style-type: none"> <li>● Location of employers</li> <li>● Lack of public investment in specific neighborhoods</li> <li>● Deteriorated and abandoned properties</li> <li>● Location of proficient schools</li> <li>● Location and type of affordable housing</li> <li>● Availability, type, frequency, and reliability of public transportation</li> <li>● Land use and zoning laws</li> <li>● Access to financial resources</li> <li>● Lending discrimination</li> <li>● Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking</li> </ul>

Publicly Supported Housing Location and Occupancy	<ul style="list-style-type: none"> <li>• Community opposition (NIMBY)</li> <li>• Impediments to mobility</li> <li>• Lack of private investment in specific neighborhoods</li> <li>• Lack of meaningful language access</li> <li>• Quality of affordable housing information programs</li> <li>• Admission and occupancy policies and procedures, including preferences in publicly supported housing</li> <li>• Private discrimination</li> <li>• Availability of affordable units in a range of sizes</li> </ul>
Disability Access	<ul style="list-style-type: none"> <li>• Lack of assistance for housing accessibility modifications</li> <li>• Access to publicly supported housing for persons with disabilities</li> <li>• Lack of affordable, integrated housing for individuals who need supportive services</li> <li>• Other: There is difficulty getting reasonable accommodation when there are fair housing issues for persons with a disability</li> </ul>
Fair Housing Enforcement, Outreach Capacity, and Resources	<ul style="list-style-type: none"> <li>• Lack of local private fair housing outreach and enforcement</li> <li>• Lack of local public fair housing enforcement</li> <li>• Lack of resources for fair housing agencies and organizations</li> <li>• Lending discrimination</li> <li>• Private discrimination</li> <li>• Lack of assistance for transitioning from institutional settings to integrated housing</li> </ul>

To address fair housing issues and their contributing factors, Clayton County developed goals that reflect strategies to improve fair housing choice. The goals consider each fair housing issue and the prioritized contributing factors. The eight goals are listed below.

#### Methodology/Overview of Process

The Assessment of Fair Housing Tool is broken down into four parts:

1. The Community Participation Process
2. Assessment of Past Goals and Actions
3. Fair Housing Analysis, which includes a demographic summary, general issues, PHA analysis, disability access analysis and fair housing analysis
4. Fair Housing Goals and Priorities

Within these sections the Assessment consists of a comprehensive review of laws, regulations, policies and practices affecting housing affordability, accessibility, availability and choice within Clayton County. The assessment specifically includes an evaluation of:

- Existing socio-economic conditions and trends in the County;



- Public and private organizations that impact housing issues in the County and their practices, policies, regulations and insights relative to fair housing choice;
- The range of impediments to fair housing choice that exist within the County;
- Specific recommendations and activities for the County to address any real or perceived impediments that exist; and
- Effective measurement tools and reporting mechanisms to assess progress in meeting fair housing goals and eliminating barriers to fair housing choice in the County.

The planning process was launched with a comprehensive review of existing studies for information and data relevant to housing need and related issues. The documents consulted include local comprehensive plans and ordinances, the Consolidated Plan for Clayton County, and other policy documents. Reports from local fair housing organizations were reviewed and information included as well. Stakeholder interviews and community survey responses were used to provide additional data and observations.

The primary data used in this assessment were HUD-provided data specifically for the AFH, and additional data were obtained from sources including Census reports, American Community Survey data, GreatSchools, ACS/Census GIS maps via PolicyMap.

HUD provided data and maps are referenced as HUD Table and HUD Map and labeled with the corresponding number and title, and other supported data are labeled AFH Map, AFH Table and/or AFH Chart and can be found in the appendix along with the sources.

The efforts pertaining to analysis of relevant data and information resulted in the decision to create the following eight (8) goals to affirmatively further fair housing:

1. Increase public awareness of fair housing rights for all communities
2. Complete, approve, and implement rewrite of planning and zoning ordinances
3. Share progress reports and successes of school improvements across departments and potential investors
4. Use code enforcement as a tool for community revitalization
5. Educate landlords about HUD guidance regarding criminal records
6. Increase affordable rental housing options
7. Increase the amount of special needs housing
8. Strengthen linkages between transportation and jobs

### III. Community Participation Process

#### PARTS. 1 and 2

Describe outreach activities undertaken to encourage and broaden meaningful community participation in the AFH process, including the types of outreach activities and dates of public hearings or meetings. Identify media outlets used and include a description of efforts made to reach the public, including those representing populations that are typically underrepresented in the planning process such as persons who reside in areas identified as R/ECAPs, persons who are limited English proficient (LEP), and persons with disabilities. Briefly explain how these communications were designed to reach the broadest audience possible. For PHAs, identify your meetings with the Resident Advisory Board.

**Provide a list of organizations consulted during the community participation process.**

In order to gain pertinent information on fair housing needs and activities in Clayton County, the Community Development Department conducted and analyzed Fair Housing Surveys completed by community residents, and stakeholder organizations across the County; conducted four, issue-based focus groups; and interviewed key stakeholders including advocacy organizations and government officials. All of the methods of outreach were conducted being mindful of outreach and information dissemination to LEP persons. The survey was translated into Spanish, the focus groups all had a native Spanish speaker present, and two interviews were conducted in Spanish. All meetings were held in accessible spaces, and the electronic surveys had an option of being converted to paper-based versions. Both formal and informal channels were used including sharing access to the survey at local businesses. The outreach was conducted in a way that aimed to include as many residents with as diverse backgrounds as possible in the process of gathering information on fair housing issues.

*Fair Housing Survey* – Web-based survey instruments, along with paper version options were distributed. The surveys were advertised and distributed the surveys through identified stakeholders and partner organizations.

The following were organizations and distribution channels for the fair housing surveys:

1. Jonesboro Housing Authority
2. UGA Mobile Market Sites
3. Senior Centers
4. Hearts to Nourish Hope
5. Phuong Duong Group
6. Clayton County Head Start (Forest Park, Rex, Jonesboro)
7. Clayton County Community Services Authority, Inc.
8. Hearts to Nourish Hope
9. Calvary Refuge Homeless Shelter

### Drop Site Locations

Carl Rhodenizer Recreation Center	770-472-8042	3499 Rex Rd	Rex	GA	30273
Jim Huie/Steve Landquist Recreation & Aquatic Center	678-479-5136	9045 Tara Blvd	Jonesboro	GA	30236
Virginia Burton Gray Recreation Center	770-603-4001	1475 East Fayetteville Rd	Riverdale	GA	30296
South Clayton Recreation Center	770-347-0200	1935 McDonough Rd	Hampton	GA	30228
Forest Park Recreation	(404) 363-2908	803 Forest Parkway	Forest Park	GA	30297
Lovejoy Community Center	(678) 479-8655	11622 Hastings Bridge Road	Lovejoy	GA	30250
Riverdale Recreation	(770) 909-5304	7210 Church St	Riverdale	GA	30274
Headquarters Library	(770) 473-3850	865 Battle Creek Rd.	Jonesboro	GA	30236
Forest Park Branch	(770) 347-0160	4812 West St.	Forest Park	GA	30297
Jonesboro Branch	(770) 478-7120	124 Smith St.	Jonesboro	GA	30236
Lovejoy Branch	(770) 472-8129	1721 McDonough Rd.	Hampton	GA	30228
Morrow Branch	(770) 347-0170	6225 Maddox Rd.	Morrow	GA	30260
Riverdale Branch	(770) 472-8100	420 Valley Hill Rd.	Riverdale	GA	30274
Forest Park Senior Center	(404) 608-2350	5087 Park Ave	Forest Park	GA	30297
Lovejoy Senior	(678) 479-8655	PO Box 220	Lovejoy	GA	30250

### Media Outlets

1. Clayton News Daily (Publish Date 3.22.17)
2. Mundo Hispanico (Publish Date: 3.23.17)
3. Clayton County Channel 23/Social Media (Release week of 3.13.17)
4. Clayton County website (Release week of 3.13.17)
5. NSP Website (3.10.17)
6. HUD Programs Division Website (3.10.17)

### Mailings (Release week of 3/13/17)

5-Year DPA

5- Year EHRP

HOA Association Contacts

*Focus Groups* – To further provide opportunities for stakeholder, advocates, and members of the public to provide in-person input, focus group meetings were held. Each session was promoted to a list of stakeholders and resident organizations throughout the County. The purpose of these focus groups was to more deeply explore issues identified via the surveys and AFH data research, and allowed different constituencies to engage one another's perspectives, and to identify key variations in viewpoints. Community residents and other interested parties were encouraged to participate in the public meetings, and interactive dialog was encouraged in order to illuminate fair housing nuances that are not easily explored through the other methods of outreach.

There were four (4) focus groups that were held in the County to solicit input from community members and stakeholders. Each was centered around a particular issue or group. They were:

- Residents (March 7, 2017 – evening)
- Advocates (March 8, 2017)
- Affordable Housing (March 8, 2017)
- Economic Development (March 9, 2017)

For Clayton County residents, community organizations were asked to distribute the invitation to their members and clients. The following organizations received the request:

- DPA Homebuyers
- EHRP Participants
- TBRA Participants
- Habitat Homebuyers
- NPI Homebuyers
- SCHFH Home Repair Participants
- HOAs Representatives
- PHA Residents

In addition, the following is a list of the organizations that were invited to send representatives to the meetings:

- Housing Authority of Clayton County
- Southern Crescent Habitat for Humanity
- National Property Institute
- New American Funding
- Primary Residential Mortgage
- Home Star Financial Corporation
- Jonesboro Housing Authority
- City of Jonesboro
- City of Forest Park
- City of Riverdale
- City of Lovejoy
- City of Morrow
- City of Lake City
- Clayton County Commissioners
- Clayton County Economic Development Department
- Clayton County Public Schools
- Clayton County Board of Health
- Clayton County Senior Services Department
- Clayton County Planning and Zoning
- Clayton County Buildings Inspections

- GA General Assembly Representatives
- Africa Children's Fund
- Calvary Refuge
- D&E Housing
- Metro Fair Housing
- Goodwill of North Georgia
- Project Community Connections, Inc.
- House of Dawn
- HOPE Shelter
- Southside Medical Center
- NID Housing Counselors
- Southern Crescent Habitat for Humanity

The following were local government agencies that were invited to attend as well:

- Code Enforcement, Forest Park, GA
- Planning and Zoning, Forest Park, GA
- Inspections, Forest Park, GA
- Community Development, Riverdale, GA
- Code Enforcement, Lovejoy, GA
- Community Development, Morrow, GA
- Code Enforcement, Lake City, GA
- Code Enforcement, Jonesboro, GA

*Targeted Stakeholder Interviews* – To obtain additional more detailed perspectives, the County conducted telephone interviews with various stakeholders. Stakeholder interviews are intended to obtain more in-depth positions of various key constituencies such as planning officials and fair housing and transportation advocates, etc.

The interviews were with people that represented the following organizations:

- Clayton County Economic Development
- Clayton County Planning and Zoning
- Clayton County Chief Operating Officer
- Georgia Commission on Equal Opportunity
- Atlanta Regional Workforce Board (Clayton State University)
- Clayton County Chamber of Commerce
- Clayton County Public Schools
- Georgia Latin American Association
- Atlanta Legal Aid
- Clayton County Police Department – Code Enforcement
- Metro Fair Housing

- Hearts to Nourish Hope
- Forest Park Ministry Association
- MARTA
- Aerotropolis Atlanta

### **PART 3**

**How successful were the efforts at eliciting meaningful community participation? If there was low participation, provide the reasons.**

Overall, there was meaningful community participation. Each of the focus groups were scheduled to last two (2) hours, but the participants were so engaged, that they often went over the allotted time. All but one of the stakeholders that were on the outreach list were responsive to requests for phone interviews, and those conversations lasted between ½ hour to one hour. Along the way, it was recommended that additional people be added to the list to glean their perspectives. In all, fifteen (15) interviews were conducted.

Where there was less engagement was with individual residents. Despite multiple attempts at outreach, turnout at the focus group was low. There were also lower than expected numbers on the surveys, both in Spanish and English. The reasons speak to a general impediment to fair housing which is lack of understanding of the process, and more generally, what one stakeholder termed “lethargy” among County residents in participation many kinds of community process or program.

### **PART 4**

**Summarize all comments obtained in the community participation process. Include a summary of any comments or views not accepted and the reasons why.**

#### *Fair Housing Survey*

The community survey was offered both in electronic format and in paper versions. In addition, the survey was translated into Spanish. There was a total of 52 responses to the survey. Despite outreach efforts, none of the surveys were responded to in Spanish which reflects the need for greater connection and outreach to the growing Spanish-speaking community.

The sample of respondents to the survey was a convenient sample, however, it was representative of the general population in several ways. The respondents race/ethnicity, age, homeownership rate, housing cost burden, and income generally track the characteristics in the general population. Women were overrepresented in this sample.

Of the respondents:

- 53% have lived in the County more than 10 years
- 87% were female
- 55% were older than 45
- 93% were Black, Non-Hispanic
- 50% earn less than \$20,000 per year
- 59% paid more than 30% of their income on housing
- 64% were homeowners

- 33% had difficulty making utility payments
- 37% not familiar with housing laws
- 73% were not aware of their rights under housing law
- 34% indicated that making payments for their housing was a housing choice barrier
- 24% indicated that condition of housing was a housing choice barrier
- 88% indicated that they were not affected by housing discrimination
- Of the people that felt that they were discriminated against, 50% did not report it because they felt it would not make a difference

#### *Focus Groups*

- Resident:
  - Difficult to find affordable rental housing
  - People can't keep up with rent increases
  - Problems with vacant and boarded up houses
  - Still a black mark on schools from loss of accreditation
  - Perception problem for County from outside
  - Happy with NSP program (individual who bought home through program)
- Affordable Housing:
  - Education is a huge issue – sense of hopelessness, “stench of educational system” from loss of accreditation; but some good schools
  - Perception issue with schools
  - Need better PR and marketing
  - Economic development needs more support from commercial redevelopment
  - Lots of homeowner repair requests but not enough resources to cover them
  - Lenders could help since more “bang for the buck” in Clayton
  - 75% who live in Clayton don't work there, and 75% who work there don't live there
  - Senior housing may be a catalyst for redevelopment of areas
  - Landlords not taking Section 8 as much anymore; need landlord education program
  - Financial literacy is a problem and predatory lending still happening
  - Open space difficult to access from some parts of the County
  - Parks for tots and not for teens; need YMCA-type programming
  - Criminal records prevent residents from finding stable housing
- Advocates
  - Stigma associated with having lived in shelters; limits housing choice
  - Metro Fair Housing handles complaints; often a misunderstanding of what is actual discrimination versus what is a disagreement; more education key
  - Random testing of housing providers is done by Metro Housing in 2016
  - 2015 Clayton #1 in underwater homes in the region
  - Underwater homeowners walking away because of lack of remedies and resources to resolve the problem
  - Abandoned housing = no tax revenue
  - “Institutional” buyers flip houses (not to high standards if at all) and rent at higher prices
  - Need more senior housing
  - \$30,000-\$40,000 per year salaries can't afford nice areas; not many higher paying job prospects

- Large special needs population in schools
- Overcrowding is an issue especially in Hispanic community
- Zero income people do not have many housing options – homeless shelters a stigma; so “couch surfing”
- Barrier to homeownership credit scores and student loans
- Economic Development
  - Strategy is to promote affordable housing around job centers with access to quality transportation
  - Need clarity on future MARTA expansion plans
  - Trying to prepare for potential TOD strategies
  - Looking to grow County differently than in the past
  - Need to capitalize on location of airport especially with the schools are still suffering from real and perceived problems
  - Has inexpensive housing but difficult to attract younger homeowners with higher incomes
  - Aerotropolis is currently in progress and should benefit County if it is prepared to welcome new labor (with housing and amenities) and increase workforce development efforts; need to be more involved in efforts
  - It is difficult to prioritize where to start improvements
  - Need financing to create new housing; need more multifamily housing done right
  - Small businesses starting to connect to each other
  - Building in the past produced low-quality, high density multifamily that overcrowded schools and caused negative perception of multifamily housing
  - Need to adopt smart growth approach for quality planning and support as County grows
  - Zoning and code enforcement is needed
  - Several municipalities are advocating for senior multifamily, transportation plans that include multifamily development, work with small businesses to create destinations
  - Major challenge is how to attract people to the County despite the schools

### *Stakeholder Interviews*

There were 15 stakeholder interviews held over the period of a month. The people interviewed came at the topic of fair housing from a variety of viewpoints. Many of the thoughts were consistent with the opinions expressed in the focus groups. Highlights include:

- MARTA has been working to increase transportation but not as frequent [service] as needed. Timeframes and routes still not conducive to people’s work schedules. – AC
- Limited housing options for disabled individuals. Still not finding accessible apartments. – AC
- Greatest challenge is lack of jobs and lack of transportation to get out and find quality jobs. – AC
- Improve communications across organizations and people. –AC
- Clayton County is the last county in the Atlanta metro region to come out of the recession. Job creation starting to happen and improving tax base. – CP



- Need certification programs for newer, higher paying jobs. –CP
- Quality of the economy and stabilization are the greatest challenges. –CP
- Train people on soft skills. –CP
- Foreclosures still a problem, but there are new programs that seem to be helping. – DA
- Have seen a shift in funding to support blight remediation. – DA
- Transportation is very important. One program lost 25% participation because of loss of MARTA. – DA
- Economy getting better. Regional industries like medical, manufacturing, and logistics. – DH
- NSP has made a big difference in getting realtors to show more fairly across protected classes. – GW
- Fewer landlords taking vouchers. Buyers are rehabbing and reselling, so dwindling options for voucher holders. – GW
- Evidence of discrimination based on national origin. Need to take a closer look. People can't complain for fear of eviction. – GW
- Starting to do real fair housing planning in the County. There is a big education about fair housing rights issue. –MT
- Need to lay down foundation on fair housing education with jurisdictional staff. –MT
- Businesses still need technical assistance to better understand licensing and permitting. – JS
- More training on self-sufficiency for both individuals and businesses. – JS
- Trying to figure out best ways to reach out to Asian and Hispanic population to make them feel more welcome. Sizable growth in their businesses. –JS
- Revamping zoning ordinances and do a better job a code enforcement. – KS
- Need to bring healthy communities, more density, transit accessible, main street strategies to the County. Seeking Green Community Designation from Atlanta Regional Council. – KS
- Vacancy is a problem in certain parts of the County that needs to be dealt with. A Community Development Corporation has formed to try to tackle the problem. – LB
- Eight zoning boards across the County need to work better together. – LB
- Lack of understanding of the progress the County schools have made since they regained

accreditation. – PA

- Every year students receive prestigious scholarships from Gates Foundation. Not acknowledge by public. – PA
- Greatest challenge in schools is that there is a high population of economically disadvantaged children, and sometimes it's hard to get teachers to understand that they can learn. There are some great teachers, but still have a ways to go more generally. –PA
- Code enforcement sees that there is segregation of ethnic and minority populations, but it is not a racial thing, it's more about economic status. – FR
- Shorthanded on code enforcement. Still a backlog of complaints, but working on minimizing the list. Went from 300 last summer to 50 now. –FR
- We do a lot of outreach with communities, but limited participation from residents. - FR

#### **IV. Assessment of Past Goals and Actions**

**Indicate what fair housing goals were selected by program participant(s) in recent Analyses of Impediments, Assessments of Fair Housing, or other relevant planning documents:**

The previous study looking at fair housing issues in Clayton County was the Analysis of Impediments (AI) to Fair Housing Choice which was completed in 2011. In that AI, there were six (6) impediments identified. They were:

1. Home Foreclosure Crisis and Neighborhood Quality
2. Housing Brokerage Practices Restricting Fair Housing Choice
3. Zoning Ordinances, Code Enforcement and Design Guidelines
4. Limited Housing Options for the Physically Impaired and Disabled
5. Limited Access to Public Transportation
6. Government Programs That Restrict Housing Choice

**a. Discuss what progress has been made toward their achievement;**

There is some progress that has been made toward addressing each of these impediments, but there is still progress to be made on each.

Clayton County was in the top 10 Counties with foreclosures during the recession, and it has been the slowest to emerge from the recession in the Atlanta Metro Area. Despite this foreclosure rates have fallen (see Section V of this report), and as a result of efforts made by both the County and organizations such as Habitat for Humanity, neighborhood quality has seen some

improvement.

The NSP program served as a springboard to address some of the brokerage practices encountered in the past that limited housing choice by educating realtors on Title VI requirements. In addition, there have been some education efforts towards educating residents on their housing rights. Metro Fair Housing has provided trainings to further promote awareness of Fair Housing Law.

Issues with zoning, code enforcement and design guidelines have seen some improvement with new zoning ordinances taking shape, more attention paid to code enforcement within the Police Department, and new design guidelines being considered as they pertain to multifamily affordable and senior housing.

Limited housing choice for physically impaired and disable individuals continues to be a problem. This remains the most common reason for fair housing complaints. The goal of increasing options for disabled people continues to be a goal for which the County strives.

Access to public transportation has been the impediment that has been most successfully addressed in 2014 in a referendum to approve bringing MARTA service back to the County. MARTA resumed service in 2015-2016. While there is still progress to be made, the resumption of service as had a tremendous positive impact on mobility and access to opportunity for County residents.

There is still education to be done around how government programs can benefit not only the recipient of the housing subsidy or assistance, but how it can provide benefits to landlords and the neighborhood as a whole. The County has made some strides in a positive direction, but more remains to be done.

**b. Discuss how you have been successful in achieving past goals, and/or how you have fallen short of achieving those goals (including potentially harmful unintended consequences)**

- **Impediment #1: Home Foreclosure Crisis and Neighborhood Quality**

*How:* We increased our NSP funding to target the rehabilitation and new construction of these housing types and provided additional education of the eligibility requirements to interested grantees/sub-recipients. We funded our CHDO, Southern Crescent Habitat for Humanity, and National Property Institute, LLC. (NPI), both whom have greatly contributed to the reduction in the foreclosure rate. We continue to work closely with Code Enforcement Division to require/mandate REO properties to maintain their property.

*Unintended consequence:* In the bad economy, we were competing with the private sector to purchase foreclosed properties to either build new construction or renovate existing properties. Our efforts were slowed down due to the well-funded, private sector developers who were able to purchase large amounts of land at a higher rate than the County, once they discovered that the County was buying foreclosed properties at moderate costs.

- **Impediment #2: Housing Brokerage Practices Restricting Fair Housing Choice**

*How:* Additional funding was increased for Metro Fair Housing to offer additional training to Clayton County residents, renters and landlords, and prepare & disseminate educational materials. Relations with the Limited-English Proficient (LEP) communities needs to be cultivated more and access to translated materials and on-line resources needs improvement.

*Unintended Consequence:* We believe (no tangible, quantifiable data at this time) that the immigrant population is hesitant to report fair housing discrimination.

- **Impediment 3: Zoning Ordinances, Code Enforcement and Design Guidelines**

*How:* Recent zoning code changes have been put in place to require specific design guidelines and case-by-case review of building materials by the Zoning Administrator, if necessary. The quality of building materials has an impact on the quality of the housing development and the perception of affordable housing in Clayton County. Several new zoning districts have been created, which may lend themselves to more opportunities for housing options and the possibility to build mixed-income housing communities. This may limit isolation of low-moderate income residents to certain corners of the County. The housing quality and housing options are a major factor that can be addressed through zoning standards.

*Unintended Consequence:* Due to the new zoning classifications that could potentially boost housing options, a requirement is needed to create cohesiveness and consistency in zoning and building codes. Educational opportunities for our local developers and builders need to be scheduled.

- **Impediment 4: Limited Housing Options for the Physically Impaired and Disabled**

*How:* Additional funding has been allocated to the Essential Home Repair Program (EHRP), which allows for the funding of ADA improvements to residential properties of low-moderate income residents. Due to an increase in the EHRP requests from veterans, seniors, and the disabled, a new pilot program, Emergency Repair Program (ERP), has been launched to support similar efforts that benefit the physically impaired and/or disabled. NSP funding also supports home builders who offer options for one or more step-less entrances which assist these groups of residents in purchasing new single-family construction or renovation projects.

*Unintended Consequence:* The grant funding does not allow for assistance to residents who do not own their home for a minimum of the past 5 years, from the time funds are requested, so a limited group of residents can actually meet HUD eligibility requirements to obtain funds.

- **Impediment 5: Limited Access to Public Transportation**

*How:* Although C-TRAN is no longer in service within the County at this time, Metropolitan Atlanta Rapid Transit Authority (MARTA), a public authority operated under Georgia law, has commenced bus services as of March 2015; since that time, ridership has continued to increase. Services is offered throughout the County and traverses City limits as well.

*Unintended Consequence:* Historic development patterns still present problems for moving people from densely populated areas to employment centers. The new zoning could potentially assist with localized employment centers to make travel distances shorter. There is discussion for MARTA to extend bus line services to the local neighborhood.

- **Impediment 6: Government Programs That Restrict Housing Choice**

Our office works strategically with our home builders NPI and SC Habitat for Humanity to choose projects that benefit many residents versus few and are those located in areas throughout the County, versus centralized areas. Metro Fair Housing will provide additional training opportunities in the 2017 program year to educate County residents, landlords and renters on fair housing laws.

*Unintended consequence:* Relations between the County and the local housing authority and local landlords has room for growth to address opportunities to take advantage of the Section 8 Housing Choice Voucher program.

- c. Discuss any additional policies, actions, or steps that you could take to achieve past goals, or mitigate the problems you have experienced.

A collaborative effort to provide consistent zoning and building codes around quality, affordable housing options is a step to be implemented to achieve past goals and mitigate some of the unintended consequences listed in the previous items above.

- d. Discuss how the experience of program participant(s) with past goals has influenced the selection of current goals.

Funding and flexibility of service delivery options has always raised issues among program participants in their attempt to adhere to HUD regulations. Current goals have been chosen in order to achieve a higher rate of success in the HUD housing program.

## V. Fair Housing Analysis

### A. Demographic Summary

#### 1. Describe demographic patterns in the jurisdiction and region, and describe trends over time (since 1990)

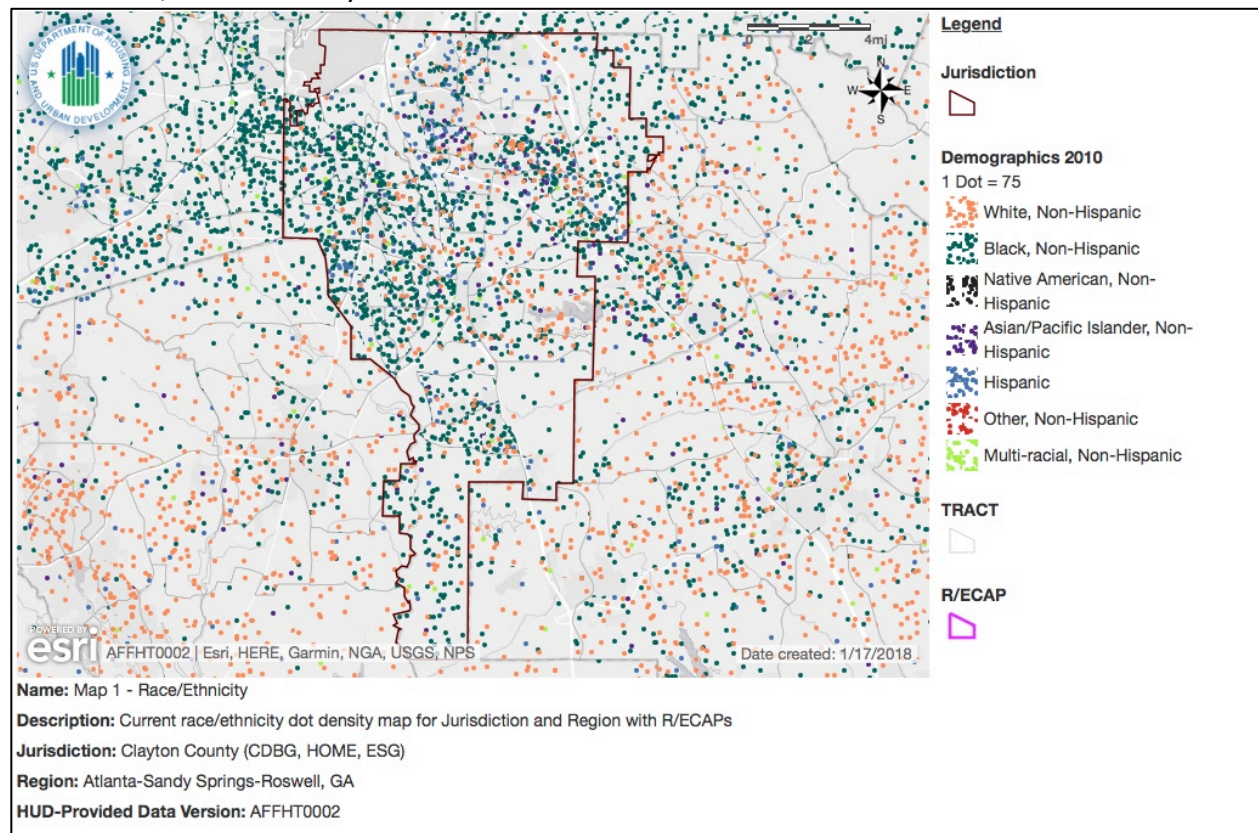
##### Racial/Ethnic Populations

Clayton County is in the north-central portion of Georgia and is part of the Atlanta-Sandy Springs-Roswell Metropolitan Statistical Area. The racial and ethnic demographics of Clayton County are very different than the rest of the region. The Black, non-Hispanic population is the majority with 64.91 percent, which is more than twice the regional Black population of 31.86 percent. The Hispanic population in Clayton County (13.72%) is slightly higher than the region (10.36%). The White, non-Hispanic population is relatively small at 14.24 percent – particularly when compared with the region where the White, non-Hispanic population is just over 50 percent.

Table – Racial and Ethnic Demographics		
	Clayton County	Atlanta-Sandy Springs-Roswell Region

	#	%	#	%
<b>White, Non-Hispanic</b>	36,528	14.24%	2,684,570	50.78%
<b>Black, Non-Hispanic</b>	166,468	64.91%	1,684,178	31.86%
<b>Hispanic</b>	35,188	13.72%	547,894	10.36%
<b>Asian or Pacific Islander, Non-Hispanic</b>	12,917	5.04%	254,691	4.82%
<b>Native American, Non-Hispanic</b>	549	0.21%	10,779	0.20%
<b>Other, Non-Hispanic</b>	463	0.18%	13,749	0.26%
Source: Decennial Census, 2010 (HUD AFFHT0002)				

MAP: Racial/Ethnic Density



Source: HUD, 2010 Census

Since 1990, Clayton County has undergone a major demographic shift. In 1990, the racial and ethnic demographics were very similar to the rest of the region, but according to current data things have changed dramatically. The White, non-Hispanic population dropped from 129,144 people to 36,528. During that same period, the Black, non-Hispanic population grew considerably from 41,738 in 1990 to 166,468. The Hispanic population has also grown substantially since 1990 from 3,680 to 35,188, making them the third most populous ethnic group in the county. If these trends continue, the Hispanic

population will be the second most populous group in the coming decade. The Asian or Pacific Island population tripled from 4,766 to 12,917, and they now represent over 5 percent of Clayton County's population.

<b>Table – Racial/Ethnicity Trends</b>								
	<b>Clayton County</b>							
	<b>1990</b>		<b>2000</b>		<b>2010</b>		<b>Current</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
<b>White, Non-Hispanic</b>	129,144	71.75%	82,583	35.04%	36,590	14.15%	36,528	14.24%
<b>Black, Non-Hispanic</b>	41,738	23.19%	122,172	51.84%	171,888	66.47%	166,468	64.9%
<b>Hispanic</b>	3,680	2.04%	17,676	7.50%	35,383	13.68%	35,188	13.72%
<b>Asian or Pacific Islander, Non-Hispanic</b>	4,766	2.65%	11,392	4.83%	13,320	5.15%	12,917	5.04%
<b>Native American, Non-Hispanic</b>	414	0.23%	1,018	0.43%	915	0.35%	549	0.21%
	<b>Atlanta-Sandy Springs-Roswell Region</b>							
	<b>1990</b>		<b>2000</b>		<b>2010</b>		<b>Current</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
<b>White, Non-Hispanic</b>	2,190,381	71.05%	2,575,783	60.41%	2,684,571	50.78%	2,684,570	50.78%
<b>Black, Non-Hispanic</b>	774,022	25.11%	1,234,307	28.95%	1,737,348	32.68%	1,684,178	31.86%
<b>Hispanic</b>	58,434	1.90%	270,338	6.34%	547,894	10.36%	547,894	10.36%
<b>Asian or Pacific Islander, Non-Hispanic</b>	50,607	1.64%	148,647	3.49%	278,025	5.26%	254,691	4.82%
<b>Native American, Non-Hispanic</b>	5,236	0.17%	17,724	0.42%	23,199	0.44%	10,779	0.20%
Source: Brown Longitudinal Tract Database based on Decennial Census 2010, Decennial Census 2000 and Decennial Census 1990 (HUD AFFHT0002)								

### National Origin Populations

Clayton County also had a large increase in the foreign-born population. In 1990, only 4.15 percent (7,471 people) were born outside of the United States, but currently over 15 percent (39,954) are foreign-born. The region saw similar growth in the foreign-born population, from 3.81 percent to 13.64 percent.

<b>Table – Foreign-Born Trends</b>				
	<b>1990</b>	<b>2000</b>	<b>2010</b>	<b>Current</b>

	#	%	#	%	#	%	#	%
<b>Clayton County</b>	7,455	4.15%	25,761	10.95%	37,914	14.69%	39,930	15.47%
<b>Atlanta-Sandy Springs-Roswell Region</b>	117,366	3.81%	424,683	9.96%	689,787	13.05%	720,964	13.64%
Source: Brown Longitudinal Tract Database based on Decennial Census 2010, Decennial Census 2000 and Decennial Census 1990 (HUD AFFHT0002)								

Mexico is, by far, the most common country of origin for residents born outside the United States. Nearly six percent of Clayton County's population was born in Mexico. The second most common place of birth is Vietnam, with 2.50 percent. The remaining countries of national origin make up less than one percent of the population each and include Haiti, Nigeria, Jamaica, Honduras, Laos, Other Caribbean, India, and Cambodia. The Atlanta-Sandy Springs-Roswell also has a large Mexican population, making up nearly 3.5 percent of the total residency, or 174,014 people. The second most common country of origin, with 1.02 percent of the population, is India. Korea, Jamaica, Vietnam, China (excluding Hong Kong and Taiwan), El Salvador, Guatemala, Colombia, and Nigeria make up the rest of the top 10 countries of origin for the region. Overall, Spanish-speaking nations in Latin America and the Caribbean, and countries in Southeast Asia are the most common countries from which foreign-born residents come.

<b>Table – National Origin</b>						
	<b>Clayton County</b>			<b>Atlanta-Sandy Springs-Roswell Region</b>		
	<b>Country</b>	<b>#</b>	<b>%</b>	<b>Country</b>	<b>#</b>	<b>%</b>
<b>#1 Country of Origin</b>	Mexico	14,012	5.84%	Mexico	174,014	3.48%
<b>#2 Country of Origin</b>	Vietnam	5,995	2.50%	India	50,770	1.02%
<b>#3 Country of Origin</b>	Haiti	2,160	0.90%	Korea	34,848	0.70%
<b>#4 Country of Origin</b>	Nigeria	2,097	0.87%	Jamaica	34,108	0.68%
<b>#5 Country of Origin</b>	Jamaica	1,870	0.78%	Vietnam	28,037	0.56%
<b>#6 Country of Origin</b>	Honduras	1,264	0.53%	China*	21,114	0.48%
<b>#7 Country of Origin</b>	Laos	897	0.37%	El Salvador	19,166	0.36%
<b>#8 Country of Origin</b>	Other Caribbean	838	0.35%	Guatemala	18,337	0.37%
<b>#9 Country of Origin</b>	India	817	0.34%	Colombia	16,109	0.32%
<b>#10 Country of Origin</b>	Cambodia	706	0.29%	Nigeria	15,061	0.30%
Source: Decennial Census, 2010 (HUD AFFHT0002)						
* Excluding Hong Kong and Taiwan						

### Limited English Proficiencies

Foreign-born populations often have limited-English proficiency (LEP), which requires agencies in the region to provide translators and services in a variety of languages. In Clayton County, the percentage of the population that has LEP increased from 2.21 percent in 1990 to 9.61 percent. In total, nearly 25,000 people in Clayton County have LEP. There was similar growth in the Atlanta-Sandy Springs-Roswell region. In 1990, 2.08 percent of the population was LEP, but that increased to 7.05 percent. In the region, 372,588 people have LEP.



<b>Table – Limited English Proficiency Trends</b>								
	<b>1990</b>		<b>2000</b>		<b>2010</b>		<b>Current</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
<b>Clayton County</b>	3,973	2.21%	17,551	7.46%	25,355	9.82%	24,815	9.61%
<b>Atlanta-Sandy Springs-Roswell Region</b>	64,104	2.08%	259,330	6.08%	365,963	6.92%	372,588	7.05%
(Source: Brown Longitudinal Tract Database based on Decennial Census 2010, Decennial Census 2000 and Decennial Census 1990) (HUD AFFHT0002)								

Spanish is the most common language for individuals with LEP in both Clayton County and the region. The rate of LEP for Spanish speakers in Clayton County is 6.33 percent, which is slightly more than the region's 4.49 percent. The second most common primary language classification for LEP individuals in Clayton is Vietnamese, spoken by 2.19 percent of the population. All other languages represent less than 0.5 percent of the population.

<b>Table – Limited English Proficiencies</b>						
	<b>Clayton County</b>			<b>Atlanta-Sandy Springs-Roswell Region</b>		
	<b>Language</b>	<b>#</b>	<b>%</b>	<b>Language</b>	<b>#</b>	<b>%</b>
<b>#1 LEP Language</b>	Spanish	15,194	6.33%	Spanish	224,781	4.49%
<b>#2 LEP Language</b>	Vietnamese	5,264	2.19%	Korean	21,996	0.44%
<b>#3 LEP Language</b>	French Creole	1,022	0.43%	Vietnamese	21,665	0.43%
<b>#4 LEP Language</b>	African	714	0.29%	Chinese	17,726	0.35%
<b>#5 LEP Language</b>	Laotian	588	0.24%	African	11,988	0.24%
<b>#6 LEP Language</b>	Cambodian	412	0.17%	Other Indic Language	6,935	0.14%
<b>#7 LEP Language</b>	French	301	0.13%	Other Asian Language	6,903	0.14%
<b>#8 LEP Language</b>	Chinese	275	0.11%	French	6,038	0.12%
<b>#9 LEP Language</b>	Korean	227	0.09%	French Creole	5,082	0.10%
<b>#10 LEP Language</b>	Hindi	164	0.07%	Russian	5,051	0.10%
Source: Decennial Census, 2010 (HUD AFFHT0002)						

### Individuals with Disabilities by Disability Type

Clayton County has slightly higher rates of disability than the region across all types. An Ambulatory Difficulty is the most common disability, experienced by 6.48 percent of Clayton County and 5.52 percent of the region's population. Cognitive Difficulty is the second most common disability with 4.7 percent in the county and 3.94 percent in the region, followed closely by an Independent Living Difficulty with 4.64 percent of the county and 3.75 percent of the region.

<b>Table – Disabilities</b>	<b>(Clayton County, GA CDBG, HOME, ESG) Jurisdiction</b>	<b>(Atlanta-Sandy Springs-Roswell, GA CBSA) Region</b>
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<b>Disability Type</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Hearing difficulty	5,739	2.43%	124,237	2.51%
Vision difficulty	4,942	2.09%	96,741	1.95%
Cognitive difficulty	11,086	4.70%	195,085	3.94%
Ambulatory difficulty	15,301	6.48%	273,305	5.52%
Self-care difficulty	6,255	2.65%	101,952	2.06%
Independent living difficulty	10,956	4.64%	185,645	3.75%
Note 1: All % represent a share of the total population within the jurisdiction or region.				
Note 2: Data Sources: ACS				
Note 3: Refer to the Data Documentation for details ( <a href="http://www.hudexchange.info">www.hudexchange.info</a> ).				

## Families with Children

In Clayton County, there are nearly 32,000 families with children, which is 51.71 percent of all families in the County. The demographics in the Atlanta-Sandy Springs-Roswell region are slightly lower but still similar: 662,976 families have children, or 49.99 percent. Communities that have a high percentage of families with children often have a unique set of needs, including public transportation, high quality education, and economic opportunities nearby.

<b>Table – Families with Children</b>		
	<b>#</b>	<b>%</b>
<b>Clayton County</b>	31,897	51.71%
<b>Atlanta-Sandy Springs-Roswell Region</b>	662,976	49.99%
Source: Decennial Census 2010 (HUD AFFHT0002)		

Since 1990, the percentage of families with children has remained stable in both Clayton County and the region. There was an increase of about 4 percent between 1990 and 2000, but by 2010 the percentage dropped back down to just under 52 percent. The region saw a similar, but less extreme, pattern. Between 1990 and 2000, the percentage of families with children went up two percent, but then fell by one percent by 2010.

<b>Table – Families with Children Trends</b>								
	<b>1990</b>		<b>2000</b>		<b>2010</b>		<b>Current</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
<b>Clayton County</b>	25,191	51.94%	21,942	55.79%	31,897	51.71%	31,897	51.71%
<b>Atlanta-Sandy Springs-</b>	400,164	48.94%	363,160	50.87%	662,976	49.99%	662,976	49.99%

<b>Roswell Region</b>								
Source: Brown Longitudinal Tract Database based on Decennial Census 2010, Decennial Census 2000 and Decennial Census 1990 (HUD AFFHT0002)								

## B. General Issues

### 1. Segregation/Integration

#### 1. Analysis

a. Describe and compare segregation levels in the jurisdiction and region. Identify the racial/ethnic groups that experience the highest levels of segregation.

The segregation levels in a jurisdiction can be quantified using Racial/Ethnic Dissimilarity Trends. According to HUD, “[t]his dissimilarity index measures the degree to which two groups are evenly distributed across a geographic area and is commonly used for assessing residential segregation between two groups. Values range from 0 to 100, where higher numbers indicate a higher degree of segregation between the two groups measured. Dissimilarity index values between 0 and 39 generally indicate low segregation, values between 40 and 54 generally indicate moderate segregation, and values between 55 and 100 generally indicate a high level of segregation.”<sup>1</sup>

Currently, Clayton County has generally low levels of segregation throughout the county. Every racial or ethnic demographic comparison made has an index value below 40. The highest value in the region is between the Asian or Pacific Islander and White populations, with an index score of 37.56, and the lowest index score is between the Non-White and White populations, with a score of 28.61. The Atlanta-Sandy Springs-Roswell region is considerably more segregated than Clayton County. In the region, the highest index score is between the Black and White populations, with a score of 61.43, which is considered a high level of segregation. The lowest index score is between Asian or Pacific Islander and White population with a score of 51.37, indicating moderate segregation.

Table: Racial/Ethnic Dissimilarity Trends								
	Clayton County				Atlanta-Sandy Springs-Roswell Region			
	1990	2000	2010	Current	1990	2000	2010	Current
Non-White/White	31.91	27.62	24.52	28.61	59.99	56.14	50.51	53.82
Black/White	35.87	29.55	33.54	33.54	66.06	63.75	58.25	61.43
Hispanic/White	12.63	36.94	34.09	36.13	35.48	51.62	49.48	52.62
Asian or Pacific Islander/White	25.52	32.85	32.90	37.56	42.92	45.51	46.39	51.37
Source: Brown Longitudinal Tract Database based on Decennial Census 2010, Decennial Census 2000 and Decennial Census 1990, ACS (HUD AFFHT0002)								

<sup>1</sup> AFFH Data Documentation, HUD 2016

**b. Identify areas in the jurisdiction and region with relatively high segregation and integration by race/ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area.**

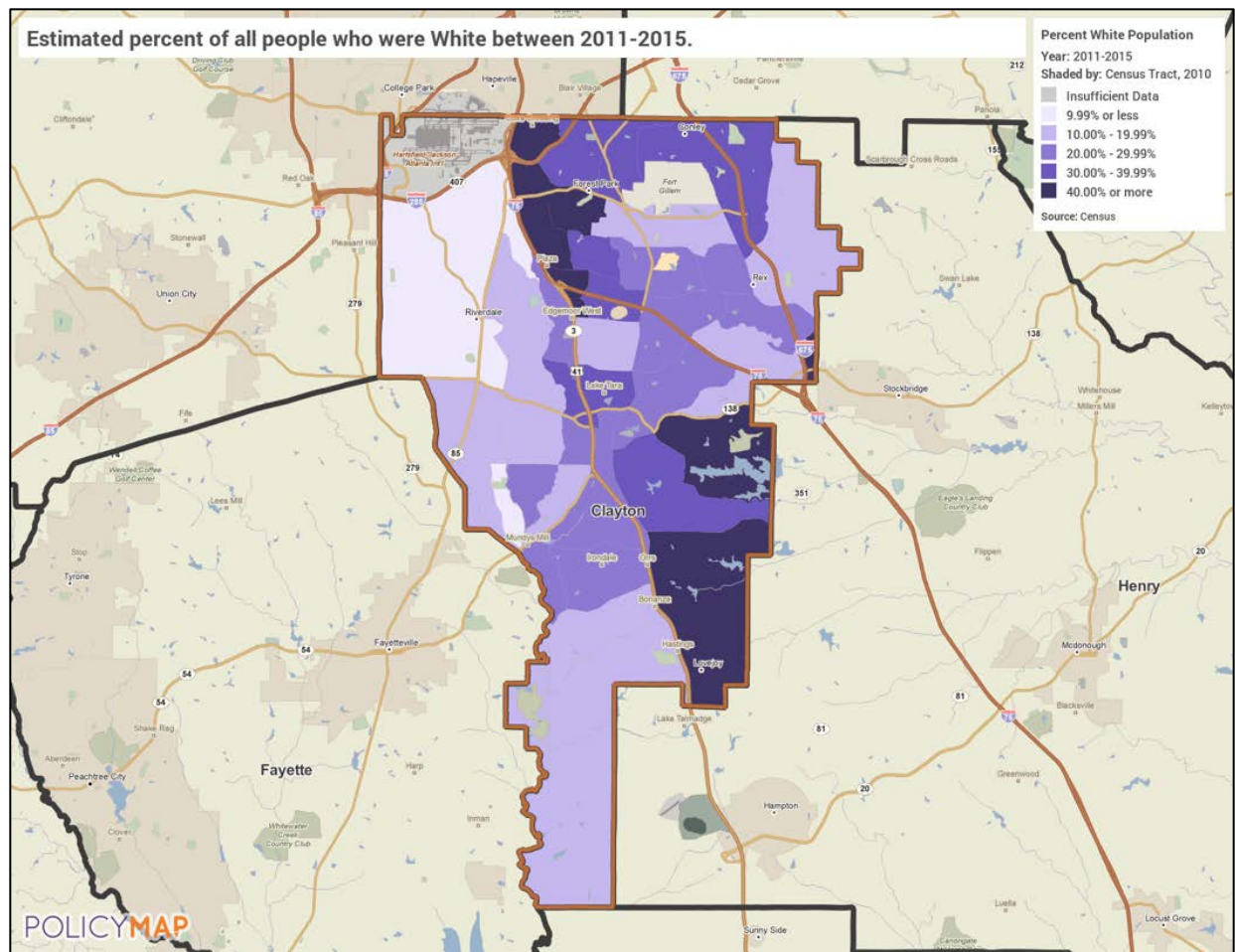
#### Jurisdiction

##### Race/Ethnicity

Clayton County is relatively integrated for the region, but there are some areas that have population concentrations based on race or ethnicity, national origin, and LEP Group. Relative segregation for an area is determined by the presence of a group compared to their overall representation in the county. For example, if 20 percent of the County's population belongs to a particular group but make up 50 percent of a particular area, that area would be relatively segregated. This section uses the most recent data available, from the 2011-2015 American Community Survey 5-Year Estimates.

*White:* Nearly 22 percent of the population of Clayton County identifies as White, but there are three areas with relatively high White populations (40 percent or greater). The first is to the east of Jonesboro, the census tracts (13063040614 and 13063040606) surrounding Lake Spivey and to the south of Blalock Reservoir. The second area is a small census tract (13063040414) to the east of the I-75 and Highway 41 intersection north of Edgemoor West. The third is a strip of three census tracts in the north central part of the county to the west and south of Forest Park (13063040308, 13063040306, and 13063040414).

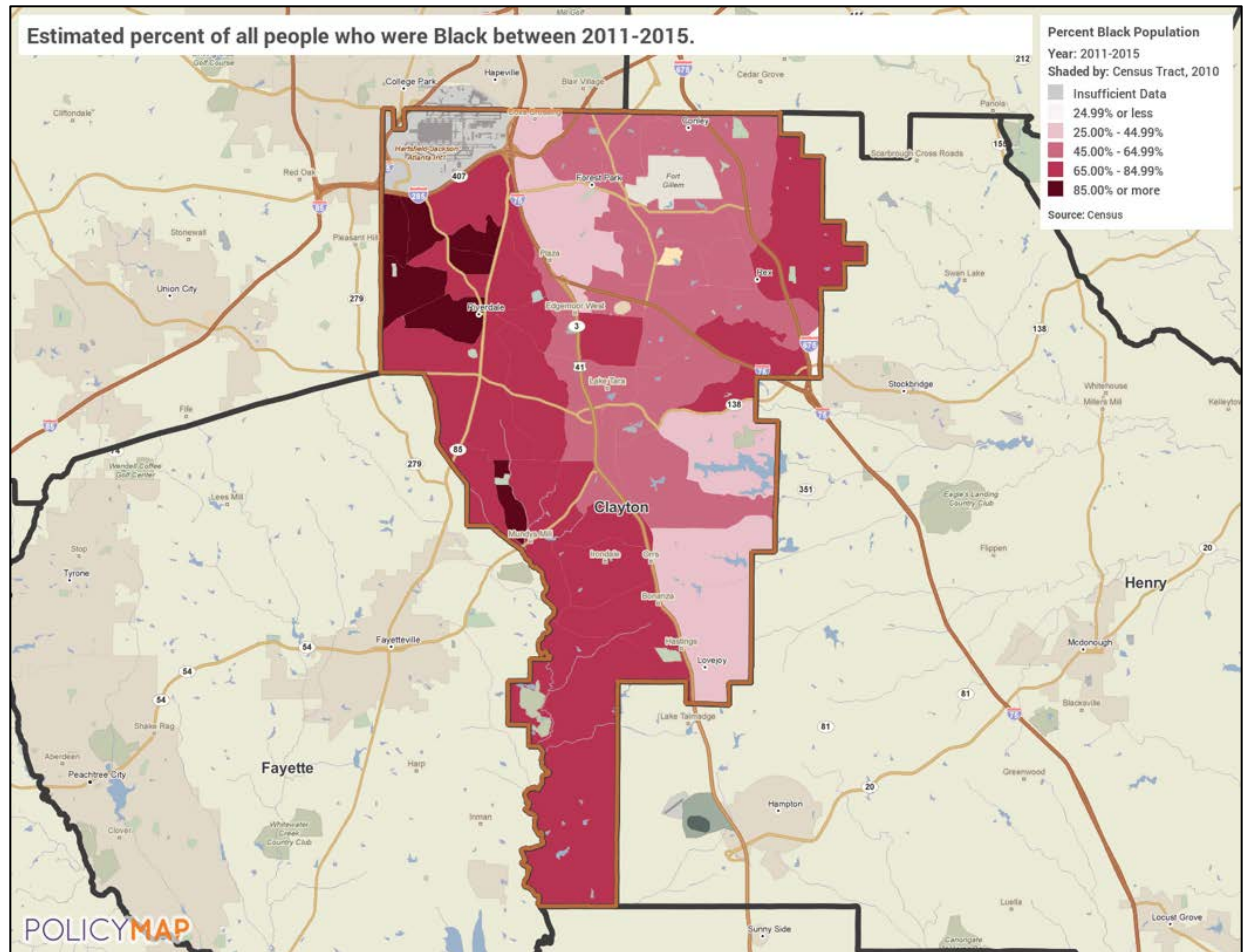
Map – Geographic Distribution of White Population



Source: 2011-2015 ACS via PolicyMap

*Black:* Approximately 66 percent of the population of Clayton County identifies as Black, but there are two areas that show relative segregation. The first area is a cluster of census tracts on the western border of the County just to the south of the airport near Williamsburg Park. Six of the census tracts in this region have a Black population of over 85 percent (13063040512, 1306304509, 13063040203, 13063040204, 13063040520, and 13063040519). There is also a lone census tract near the southwestern border of the County between Fayetteville Road and Flint River Road (13063040525).

Map – Geographic Distribution of Black Population

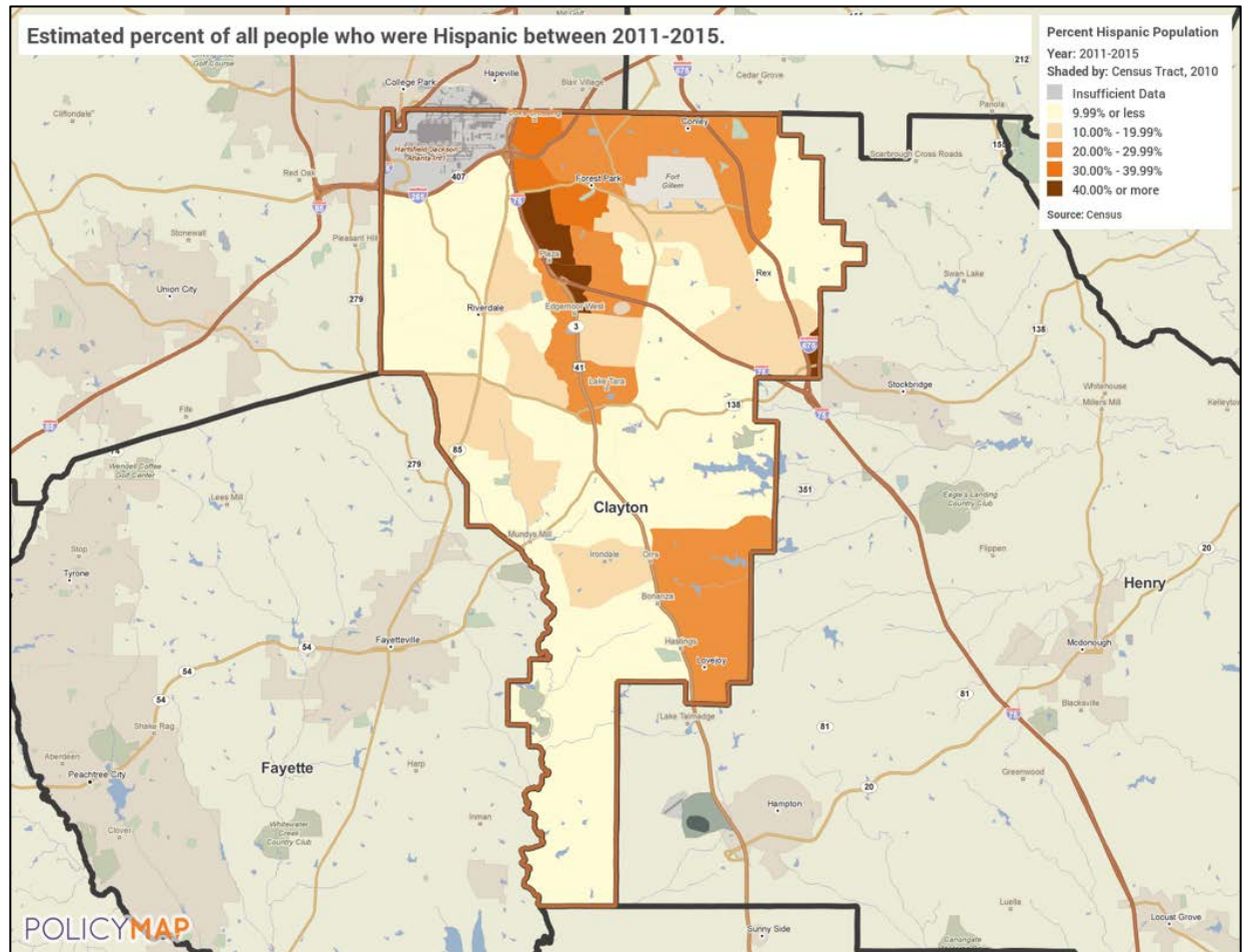


Source: 2011-2015 ACS via PolicyMap



*Hispanic:* Approximately 13 percent of the population of Clayton County identifies as Hispanic, but there are two areas with a disproportionately high Hispanic population, over 45 percent. The first is a census tract (13063040306) southwest of Forest Park east of Interstate 75. The second area is a census tract (13063040617) to the east of Interstate-675 near exit 1. This tract has a population that is over 60 percent Hispanic. Because Hispanic is an ethnic classification and not a racial classification, it is possible for individuals to identify as Hispanic and a Race (i.e. White-Hispanic or Black-Hispanic).

Map – Geographic Distribution of Hispanic Population

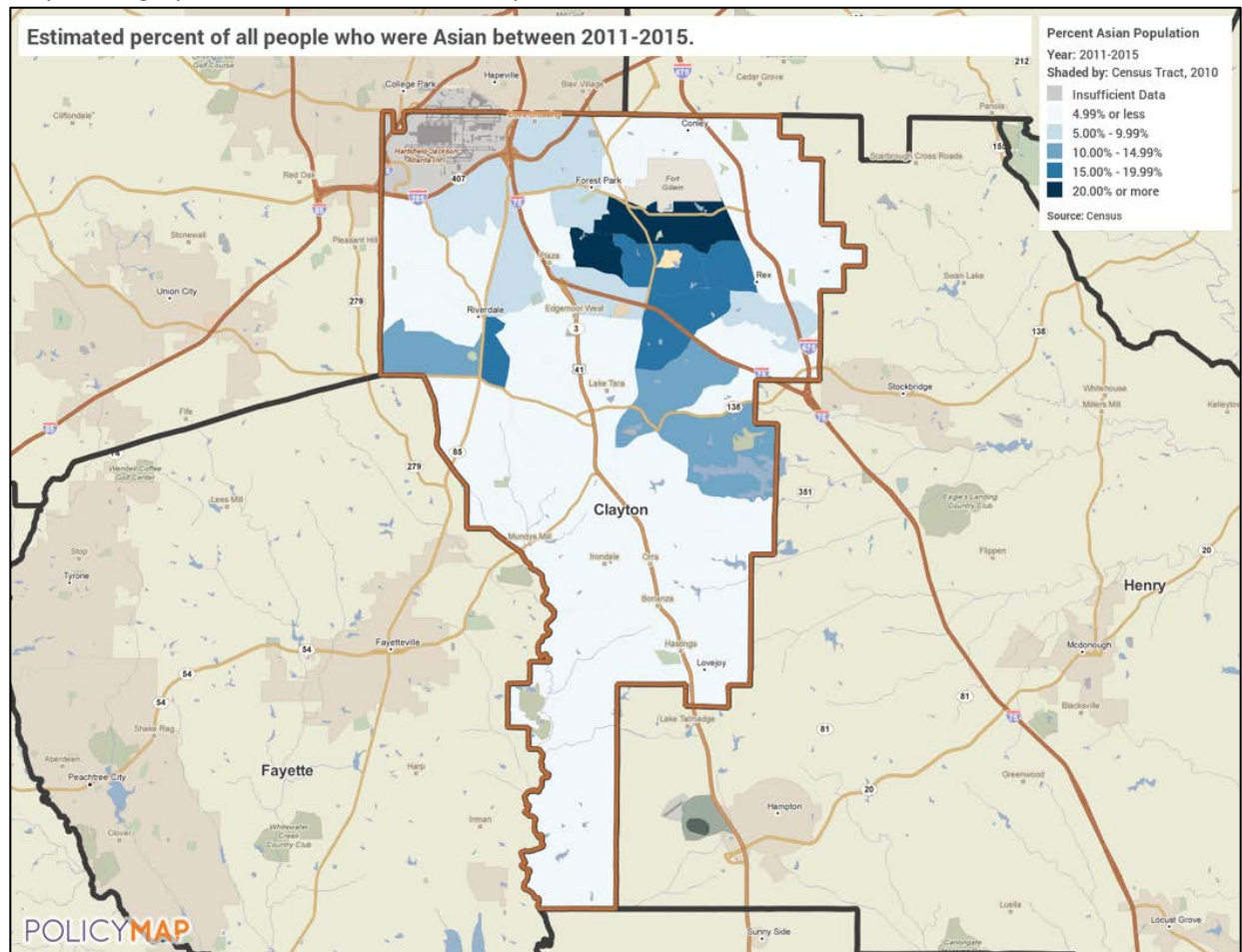


Source: 2011-2015 ACS via PolicyMap



*Asian:* Approximately 5 percent of Clayton County identifies as Asian. There are two census tracts near each other (13063040307 and 13063040407) with relative segregation of this racial group. Over 20 percent of the population in these tracts is Asian and they are located west and north of Clayton State University.

Map – Geographic Distribution of Asian Population



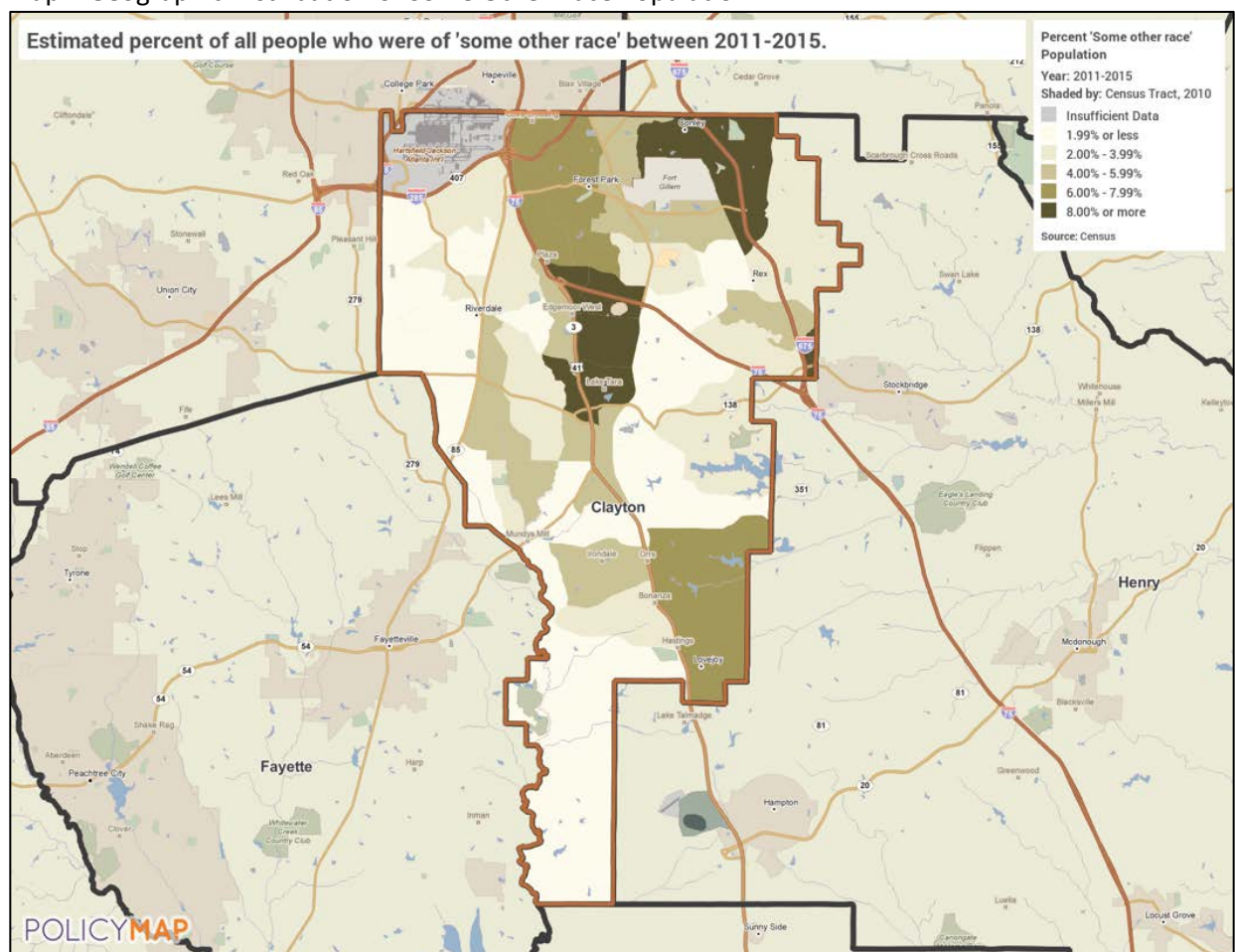
Source: 2011-2015 ACS via PolicyMap

*Native Hawaiian or Other Pacific Islander:* Approximately 0.01 percent of the population of Clayton County identifies as Native Hawaiian or Pacific Islander. There are no census tracts with relatively high segregation for this racial group.

*American Indian or Alaska Native:* Approximately 0.22 percent of the population falls into this category. There are no areas in Clayton County that show relative segregation based on race for this group.

*Other Race:* Nearly 4 percent of the population identifies as Other Race in Clayton County. One census tract has a population of over 25 percent for this group, to the east of Interstate 675 near exit 1.

Map – Geographic Distribution of Some Other Race Population



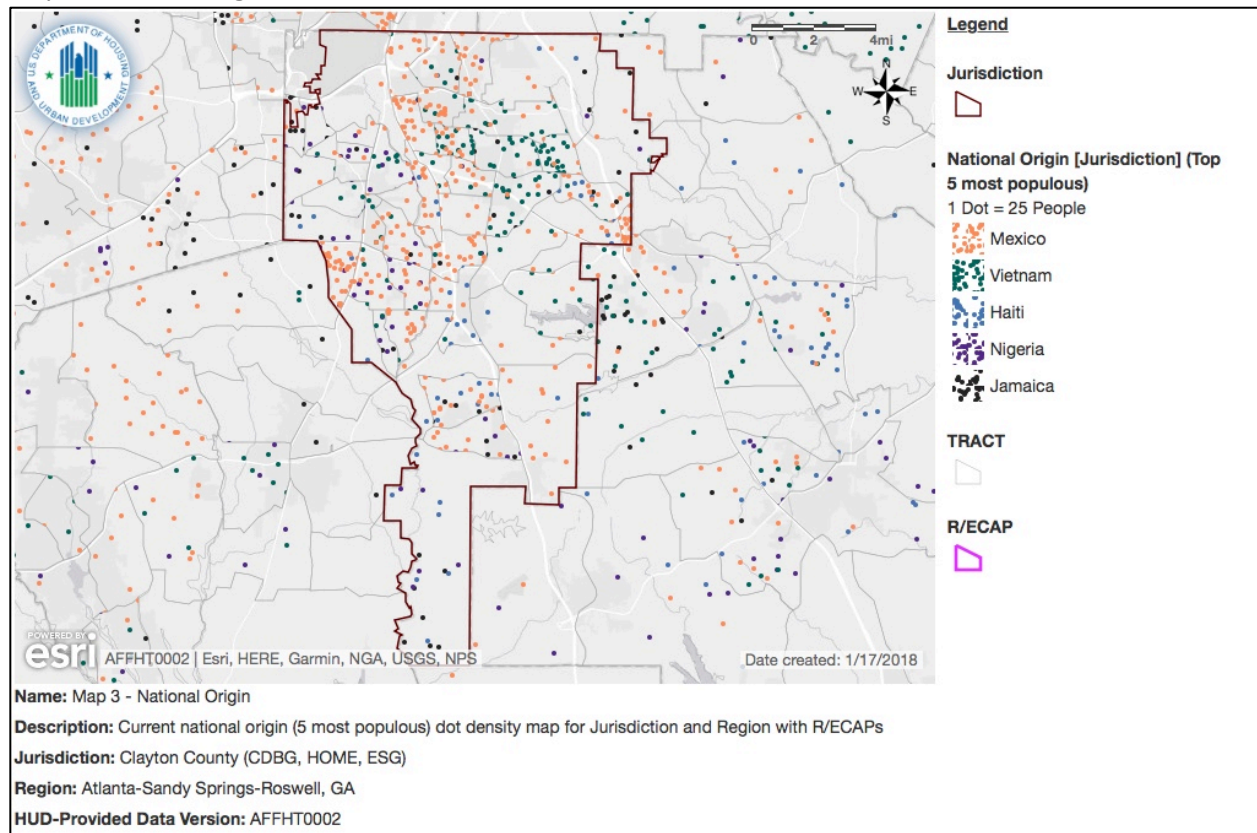
Source: 2011-2015 ACS via PolicyMap

### National Origin and LEP

Areas of relative segregation by national origin and LEP are intertwined. As expected, areas with a higher rate of residents from a particular country also have higher rates of individuals who primarily speak the

native language of that country. In the top five LEP and national origin groups, there are two exceptions to this language/national origin overlap. Jamaica, where the national language is English, does not have a concentration of LEP in areas with a relatively high Jamaican population. Also, the fifth largest LEP population speaks Laotian but residents from Laos are only the 7th most populous demographic.

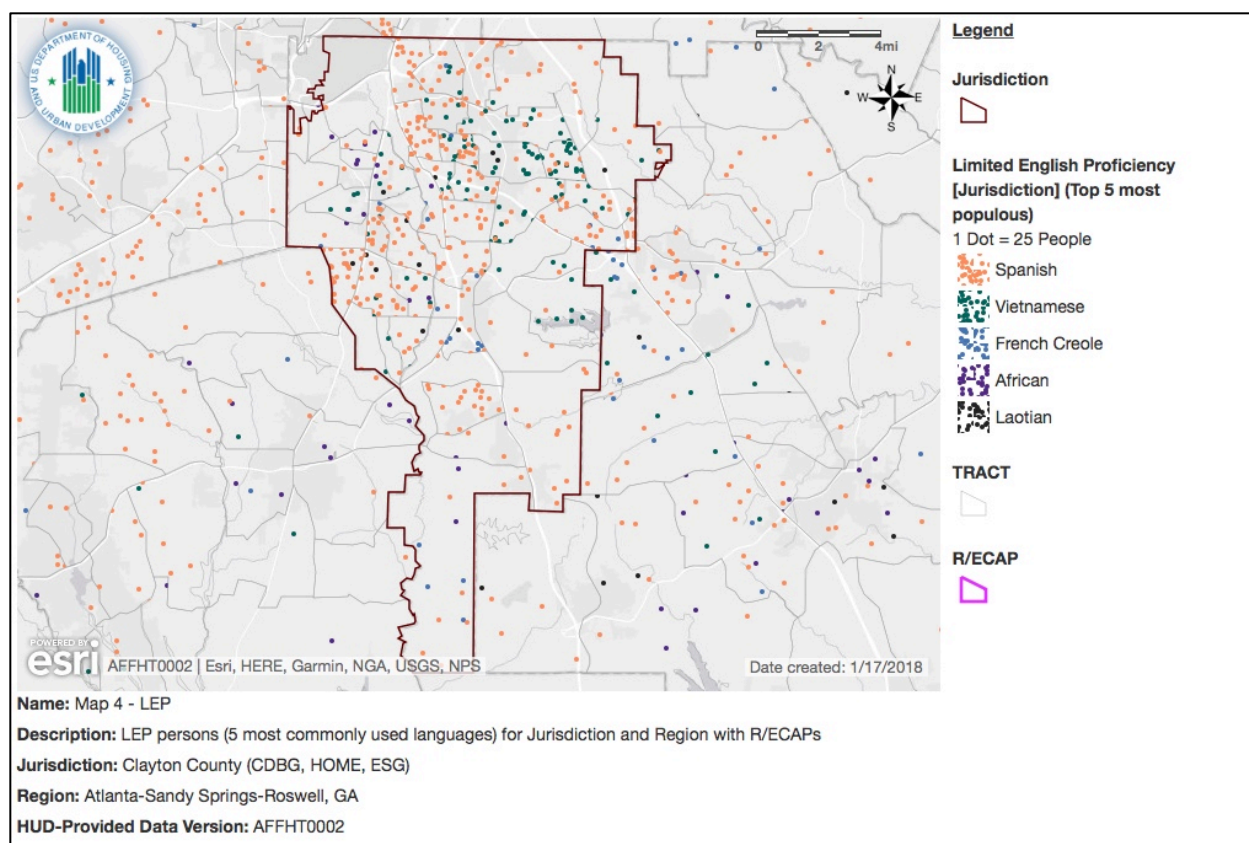
Map – National Origin



Source: HUD

Map – Limited English Proficiency (LEP)





Source: HUD

*National Origin – Mexico, LEP - Spanish:* Spanish-speaking and Mexican residents are somewhat common throughout Clayton County, but there are three areas with a relative concentration of both. The first area is a string of census tracts starting from the east of the airport and moving south in a backwards “c” shape ending at the Fayette County border between Highway 138 and Highway 85. The second area is a census tract near the southern part of the County bordered by Fitzgerald Road on the west, Tara Road on the south, Highway 19 on the east, and Mundys Mill Road on the north. The final area of relative concentration is a group of census tracts on the east part of the county near I-675 exit 1, particularly east of the interstate.

*National Origin – Vietnam, LEP - Vietnamese:* The Vietnamese population in the county is clustered in a group of six census tracts centered on the city of Morrow. According to local reports, the Vietnamese population in Clayton County is incredibly active in the business world. This population is also growing within Clayton County; per the American Community Survey the number of Vietnamese-born residents has grown by nearly 1,000 from 5,684 in 2009 to 6,477 in 2015.

*National Origin – Haiti, LEP – French Creole:* There are two different clusters of relative segregation for this population. The first is a single census tract west of the intersection between I-75 and Highway 41. The second area is a cluster west of Jonesboro.

*National Origin – Nigeria, LEP - African:* There are two locations with a relatively high number of Nigerian residents. The first is in the southern part of the County in a census tract between Tara Road and

McDonough Road. The second area is a large cluster of census tracts west of Flint River all the way to the county line.

*National Origin – Jamaica:* The Jamaican community is nearly uniform throughout the county. There does appear to be a slightly larger group of residents clustered in two census tracts in the south between Mundys Mill Road and McDonough Road.

*LEP – Laotian* – The Laotian-speaking population is relatively small but clustered in a string of census tracts that form a rough “c” shape starting in the northeast and ending to the south near Lake Spivey.

## Region

### Race/Ethnicity

The Atlanta-Sandy Springs-Roswell region is relatively integrated overall. The Racial/Ethnic Dissimilarity scores are in the 50's and 60's, but there are some areas that have population concentrations based on race or ethnicity, national origin, and LEP Group.

*White:* The White population is almost completely absent from the downtown Atlanta areas, particularly to the east, west and south. This population is the primary population in the northern parts of the city and throughout the north suburban areas.

*Black:* The Black population in the region primarily lives in areas opposite the White population. Eastern, western, and southern Atlanta have a high Black population. There are also pockets of Black residents to the south and west in Griffin, Newman, and Carrollton

*Hispanic:* The Hispanic population tends to be more evenly distributed than the Black or White populations. This group lives in both the southern and northern areas of the Atlanta area. There does not appear to be a large Hispanic population in the more rural census tracts.

*Asian:* The Asian population of the region is heavily concentrated in the northern suburban areas around Atlanta. Census tracts to the north east of Atlanta in particular have a relatively large Asian population.

*Native American:* The Native American population is relatively small and appears to be fairly evenly distributed throughout the region. There are no clear areas of segregation.

*Other Race:* This population is also fairly distributed throughout the region, but there is a small concentration to the northwest of Atlanta in a series of Census Tracts near Kennesaw State University – Marietta and Dobbins Air Reserve Base.

### National Origin and LEP

Areas of relative segregation by national origin and LEP are intertwined. As expected, areas with a higher rate of residents from a particular country also have higher rates of individuals who primarily speak the native language of that country. In the top five LEP and national origin groups, there are three exceptions to this language/national origin overlap. India, where one of the national languages is English, does not

have a concentration of LEP in areas with a relatively high Indian population. Also, the second largest LEP population speaks Chinese and the fourth largest LEP population speaks Vietnamese but residents from Vietnam or China are not one of the five most populous groups according to the HUD mapping tool.

Data Note: The most populous National Origins and LEPs in the HUD AFFH Data Tool does not match the HUD AFFH Mapping Tool. For this analysis the HUD AFFH Mapping Tool was used.

*National Origin – Mexico, LEP - Spanish:* The Mexico-born and Spanish LEP population live primarily in tracts around downtown Atlanta. In particular, Clayton County and tracts to the northeast and northwest of the city have relatively high numbers of these populations.

*National Origin – India:* The population from India is outside of Atlanta to the northeast, northwest, south, and eastern census tract.

*National Origin – El Salvador, LEP - Spanish:* The El Salvadorian population is significantly smaller than the Mexican population, but the living patterns are very similar. Again, they tend to live in tracts on the outskirts of Atlanta to the northeast and northwest.

*National Origin – Brazil, LEP - Portuguese:* This population is primarily found in census tracts north of Atlanta. There is also a small group living south of Atlanta in Clayton County.

*National Origin – Guatemala, LEP - Spanish:* Similar to other groups in this section, the Guatemala-born population lives primarily outside of Atlanta but this group is not nearly as segregated as others. They are fairly evenly dispersed throughout the region.

*LEP – Chinese:* The Chinese speaking population is primarily found in Clayton County and census tracts to the east and northeast of Atlanta. There is also a smaller population to the northeast and in downtown Atlanta.

*LEP – Vietnamese:* The Vietnamese speaking population is relatively small in the region. They live primarily to the north of Atlanta, particularly in the north east.

**c. Explain how these segregation levels and patterns in the jurisdiction and region changed over time (since 1990).**

Levels of segregation have increased slightly in Clayton County since 1990, but the change has not been uniform. Segregation has decreased overall between Non-White and White populations, and Black and White populations. Conversely, the index score for Hispanic and White populations was 12.63 in 1990, but increased by almost 20 points to 36.13. The Asian or Pacific Islander and White index increased during this period as well, from 25.52 to 37.56.

The region saw a similar change in segregation. The Non-White/White and Black/White index numbers

both fell by approximately 5 points. The Hispanic/White index increased from 35.48 to 52.62 and the Asian or Pacific Islander/White index increased from 42.92 to 51.37. Considering the Hispanic ethnic group is one of the fastest growing in country it is important to address any segregation that may be starting to solidify in the county and region.

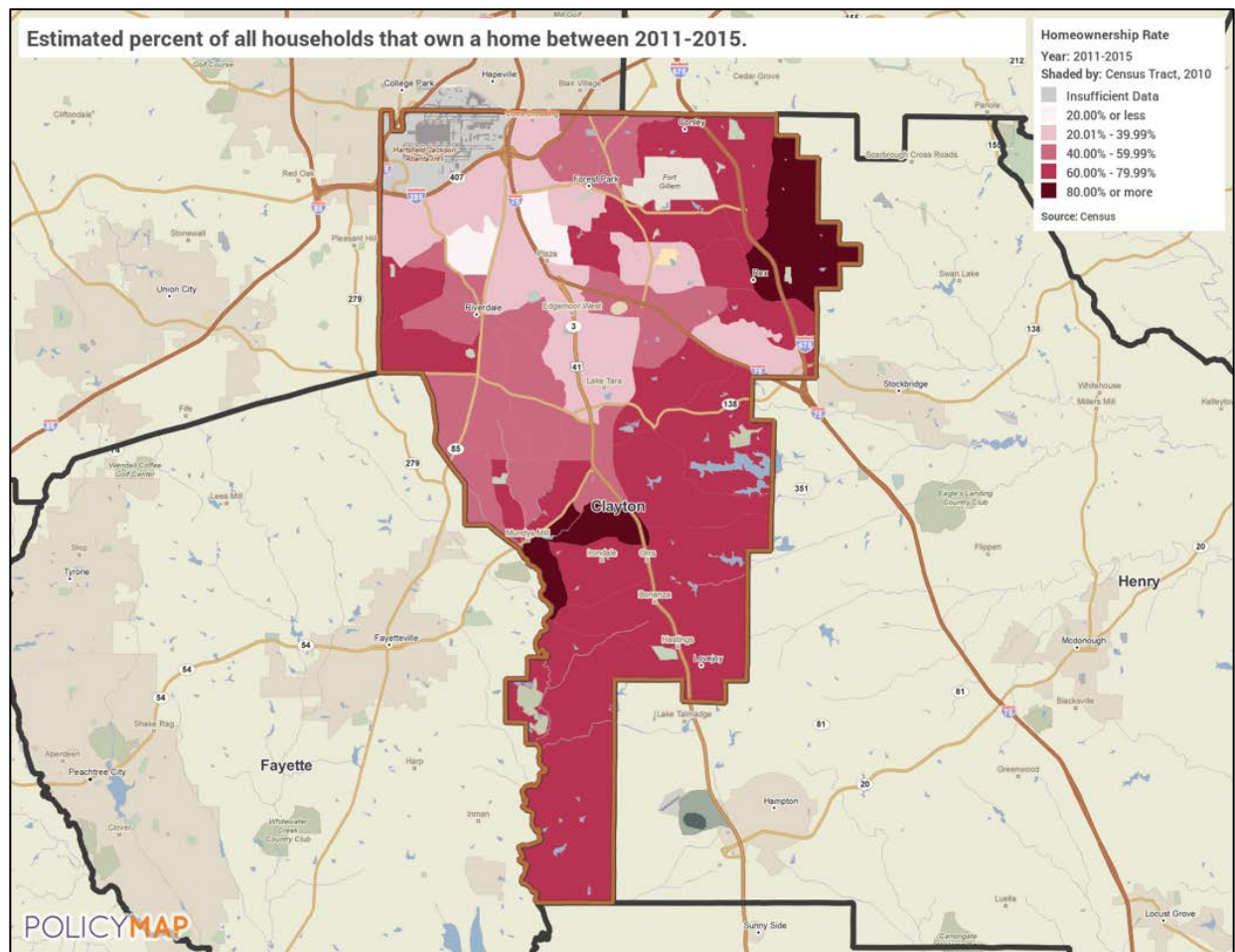
**d. Consider and describe the location of owner and renter occupied housing in the jurisdiction and region in determining whether such housing is located in segregated or integrated areas, and describe trends over time.**

In Clayton County, 13.33 percent of the population is Hispanic, 5.05 percent of the population is Asian, 15.06 percent is foreign-born, 10 percent is non-English speaking, and 46.13 percent live in rental units. Based on HUD-provided data, the American Community Survey 5-Year Estimates 2011-2015, and information from the US Census, one area of the County is relatively segregated with a disproportionate number of rental units.

Renter-occupied housing is primarily near the airport, along Interstate-75, and south on Highway 41 until Jonesboro. These census tracts also have higher concentrations of residents with LEP proficiency. Spanish-speaking residents are in the majority of these census tracts, Vietnamese-speaking residents live towards the east near Clayton State University, and French Creole-speaking residents live near the city of Jonesboro. Conversely, regions with higher rates of owner-occupied housing tend to have fewer residents with LEP.

Per the 2011-2015 American Community Survey 5-Year Estimates, homeowners accounted for 52.7 percent of occupied housing units in Clayton County. The geographic distribution of homeowners is not uniform throughout the County. As you get closer to the Hartfield-Jackson Airport, home ownership rates start to decline to less than 40 percent. Two census tracts have less than 20 percent of residences occupied by owners. The census tracts with the highest rate of homeownership are in the easternmost and southernmost tracts near Mundys Hill. Conversely, the rental occupancy rate increases as you get closer to the airport and decrease to the south and east.

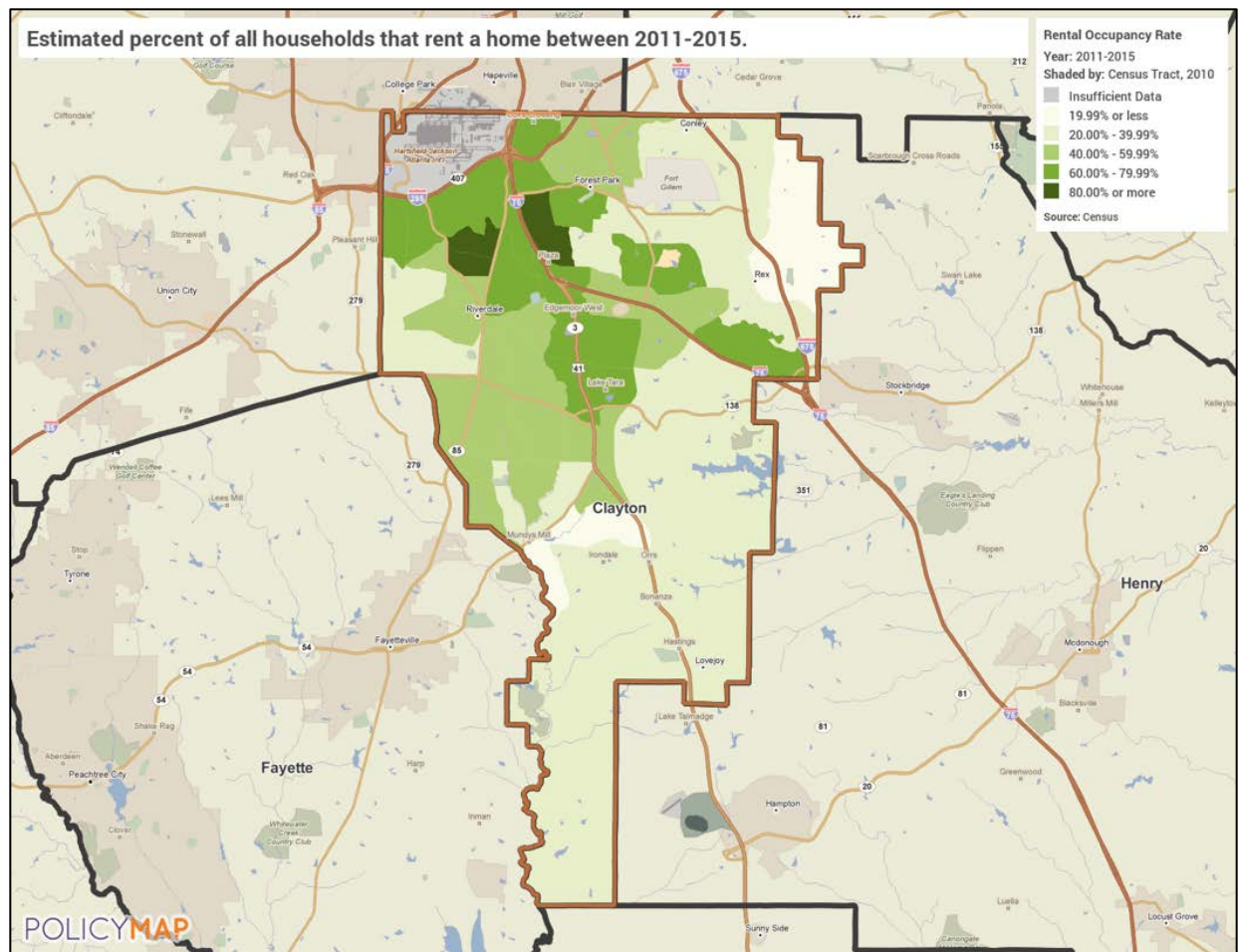
Map: Owner Occupied Housing



Source: 2011-2015 ACS via PolicyMap

Map: Renter Occupied Housing





Source: 2011-2015 ACS via PolicyMap

Homeownership rates declined steadily in Clayton County between 2000 and 2015. In 2000, 60.6 percent of the occupied housing units were owner-occupied, but by 2015 that figure dropped to 52.7 percent. The Atlanta-Sandy Springs-Roswell region also saw a reduction in homeownership between 2000 and 2015, but the reduction was significantly less than what was seen in Clayton County. In 2000, the region homeownership rate was 66.8 percent and in 2015 the homeownership rate was 63.5 percent, a three percent drop.

Table - Percent of Housing Occupied by Renters and Owners						
	2000		2010		2015	
	Renter	Owner	Renter	Owner	Renter	Owner
<b>Clayton County</b>	39.4%	60.6%	42.9%	57.1%	47.3%	52.7%
<b>Atlanta-Sandy Springs-Roswell Region</b>	33.2%	66.8%	33.9%	66.1%	36.5%	63.5%
Source: 2000 Decennial Census DP-1, 2010 Decennial Census DP-1, 2011-2015 ACS 5-Year Estimates B25003						

Affordable housing in Clayton County and the region is less available now than it has been in the past. In 2000, 22.4 percent of homeowners and 36.5 percent renters in Clayton County were paying over 30 percent of their income on housing costs (which means they are cost burdened, according to the HUD definition). The Atlanta-Sandy Springs-Roswell region had nearly identical rates of cost burden in 2000, with 36.5 percent of renters and 21.6 percent of owners. By 2015, the rate of cost burdened renters and owners increased substantially in Clayton County. Homeowners had a cost burdened rate of 29.8 percent and the rate of cost burdened renters increased to 59.8 percent in 2015. There was similar, though less dramatic, growth in the region. In 2015, 52 percent of renters and 26.6 percent of homeowners were cost burdened throughout the region.

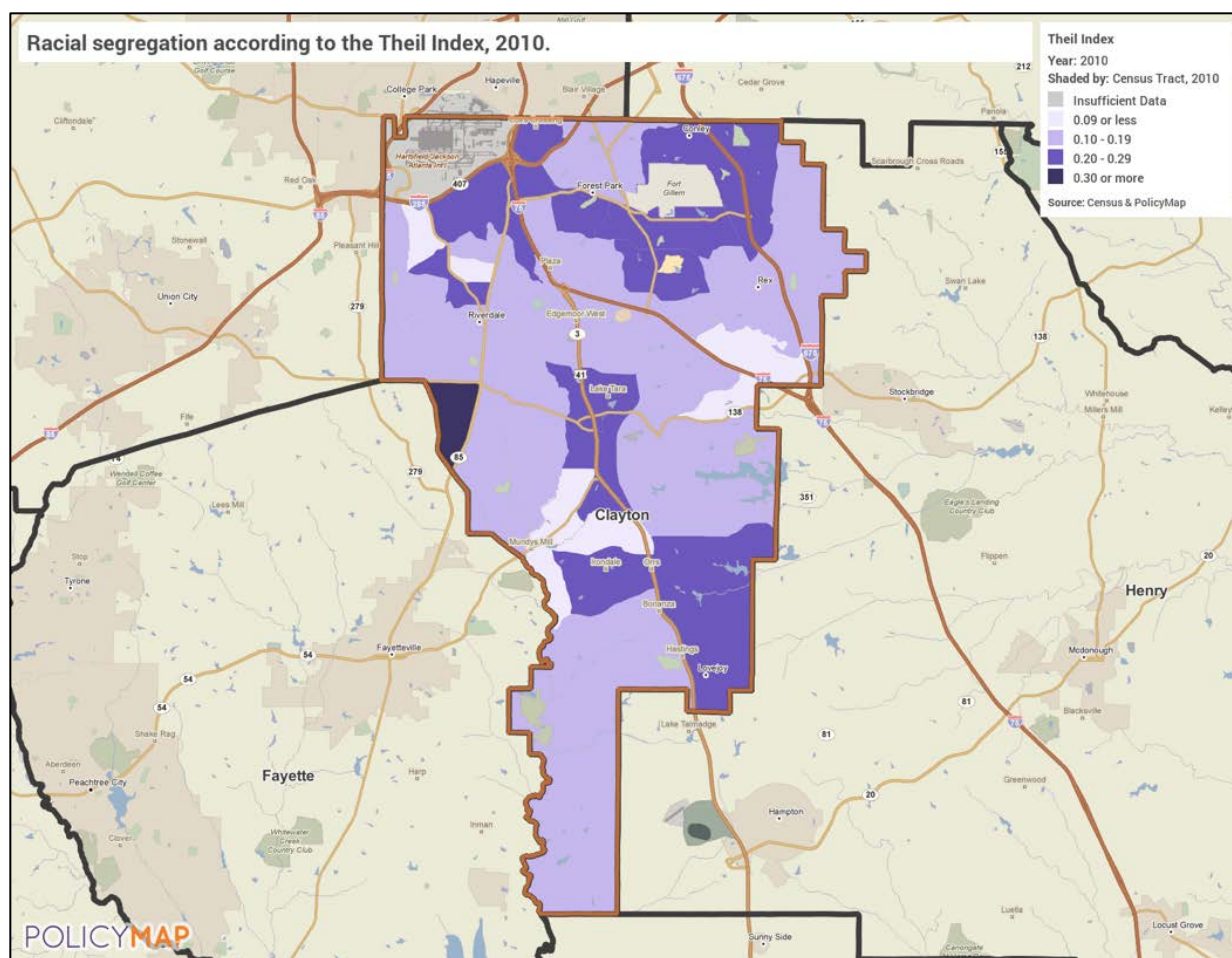
<b>Table – Cost Burdened Households</b>						
	<b>2000</b>		<b>2010</b>		<b>2015</b>	
	<b>Renter</b>	<b>Owner</b>	<b>Renter</b>	<b>Owner</b>	<b>Renter</b>	<b>Owner</b>
<b>Clayton County</b>	36.5%	22.4%	57.3%	38.4%	59.8%	29.8%
<b>Atlanta-Sandy Springs-Roswell Region</b>	36.5%	21.6%	51.8%	32.4%	52.0%	26.6%
Source: Decennial Census 2000, American Community Survey 5-Year Estimates 2006-2010, 2011-2015						

**e. Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future. Participants should focus on patterns that affect the jurisdiction and region rather than creating an inventory of local laws, policies, or practices.**

Overall, according to HUD-provided data, segregation is not changing substantially within Clayton County. One important exception to this is the dissimilarity trends between White, Non-Hispanic and Hispanic populations. Those two demographics have seen an increase in the dissimilarity index from 12.63 to 36.13. Considering that the Hispanic population is the fastest growing racial/ethnic demographic in the county, it is important to address this issue before it becomes a problem.

The Theil Index is an index that displays information about racial segregation. Low scores (below .20) suggest less segregation while high scores (above .40) suggest greater segregation. Within Clayton County, one census tract has a Theil Index score over .30. This tract is located in the western part of the county in between Highway 138 and Highway 85. Within this tract only 3.82 percent of the population identify as White, Non-Hispanic. Nearly 70 percent of the population identifies as Black, Non-Hispanic, while nearly 25 percent of the population identifies as Hispanic.

MAP – Theil Index



Source: 2010 Census via PolicyMap

## 2. Additional Information

**a. Beyond the HUD-provided data, provide additional relevant information, if any, about segregation in the jurisdiction and region affecting groups with other protected characteristics.**

The Federal Fair Housing Act prevents housing discrimination based on the following protected classes: race, color, national origin, religion, sex/gender, familial status, and disability. Race, Color, Familial Status, and National Origin are addressed above and Disability is addressed later in this document. The Georgia Fair Housing Act does not include any additional protected groups.

According to interviews with regional leaders, much of the small amount of segregation is not due to lack of choice. Many residents, particularly foreign-born and limited-English proficiency residents, prefer to live with or near members from their culture. This does not mean that Clayton County should discount or ignore such segregation, but it does support the data that Clayton County is an integrated county.

**b. The program participant may also describe other information relevant to assessment of segregation, including activities such as place-based investments and geographic mobility options for protected class groups.**

The Jonesboro Housing Authority is responsible for implementing the Section 8 Housing Choice Voucher program in the jurisdiction. The intention of this program is to promote housing mobility and choice, but the number of vouchers available is extremely limited. Low-income residents who lack the mobility that vouchers provide often find themselves in socioeconomically segregated areas with little opportunity to relocate.

### *3. Contributing Factors of Segregation*

*Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of segregation.*

- Community opposition
- Displacement of residents due to economic pressures
- Lack of community revitalization strategies
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Lack of regional cooperation
- Land use and zoning laws
- Lending discrimination
- Location and type of affordable housing
- Loss of Affordable Housing
- Occupancy codes and restrictions
- Private discrimination
- Source of income discrimination
- Other

According to the 2011 Clayton County Analysis of Impediments (AI) report, government policies can contribute segregation within the county. Inadequate supplies of public housing and other resources can restrict housing options for low-income families, as well as the homeless and near homeless. ***The location and type of public housing*** reduces housing choice and can lead to segregation.

One of the impediments identified in the 2011 AI was “Housing Brokerage Practices Restricting Housing Choice.” The planned action to address this impediment was to minimize any form of housing segregation and discrimination.

Rising housing costs can lead to ***displacement of residents due to economic pressures***. As the cost of housing rises, low-income residents – particularly renters who do not see rising housing costs as an

increase in the value of their investment – can be pushed out of their homes. When income is strongly linked to race or ethnicity this can lead to racial and ethnic segregation. Low-income residents gather together along racial and ethnic lines and are priced out of more affluent areas.

The following table displays economic changes over time within Clayton County. The county has seen considerable growth in gross rent, housing costs for homeowners, and the rate of cost burdened residents. In addition, the median household income and home values in the county have decreased since 2000. This economic shift can push out residents who are no longer able to afford to live in the county. This **loss of affordable housing** may be contributing to segregation issues within the county.

<b>TABLE: Economic Changes Over Time (Clayton County)</b>			
	<b>2000</b>	<b>2015</b>	<b>Percent Change</b>
Median Gross Rent	\$699	\$881	26.0%
Median Owner Housing Costs (with Mortgage)	\$898	\$1,153	28.4%
Median Owner Housing Costs (without Mortgage)	\$288	\$376	30.6%
Home Value	\$92,700	\$85,200	-8.1%
Cost Burdened Renters	36.5%	59.7%	63.6%
Cost Burdened Home Owners	22.4%	29.2%	30.4%
Median Household Income	\$42,638	\$40,938	-0.4%
Source: 2011-2015 American Community Survey 5-Year Estimates, 2000 Decennial Census			

Clayton County has relatively high segregation between the Hispanic and the White, Non-Hispanic population. During the 2017 interviews, one community leader pointed out that much of this segregation might be by choice rather than design. Residents born outside of the United States tend to move where they have family and cultural familiarity. This choice can contribute to segregation.

The County and community also currently **lack a community revitalization strategy**. The County is aware of this issue and has been moving to improve the situation. A countywide cohesive strategy to improve housing options is in the works and the County will work with local government, non-profit, and business organizations to create a plan.



## 2. Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)

### 1. Analysis

#### a. Identify any R/ECAPs or groupings of R/ECAP tracts within the jurisdiction and region.

Based on the AFFH Mapping Tool, there are no R/ECAPs within Clayton County. However, according to the HUD-provided data table, there are residents in Clayton County who live in R/ECAP tracts.

#### b. Describe and identify the predominant protected classes residing in R/ECAPs in the jurisdiction and region. How do these demographics of the R/ECAPs compare with the demographics of the jurisdiction and region?

According to the HUD data tool, the Clayton County R/ECAP has a significantly higher Hispanic population than the county as a whole. Hispanic individuals make up 33.01 percent of the R/ECAP but only 13.72 percent of the county. The Black, non-Hispanic population is smaller in the R/ECAP with 48.32 percent, compared to 64.91 percent in the county. Families in the R/ECAP are more likely to have children than the county as a whole.

Table: Comparison of Jurisdiction Population and Jurisdiction R/ECAPs						
	Clayton County			Clayton County R/ECAP		
Race/Ethnicity		#	%		#	%
White, Non-Hispanic		36,528	14.24%		2,709	12.91%
Black, Non-Hispanic		166,468	64.91%		10,137	48.32%
Hispanic		35,188	13.72%		6,925	33.01%
Asian or Pacific Islander, Non-Hispanic		12,917	5.04%		844	4.02%
Native American, Non-Hispanic		549	0.21%		36	0.17%
Other, Non-Hispanic		463	0.18%		45	0.21%
Family Type		#	%		#	%
Families with Children		31,897	51.71%		2,638	56.09%
National Origin	Nation	#	%	Nation	#	%
#1 country of origin	Mexico	14,012	5.84%	Mexico	3,160	15.06%
#2 country of origin	Vietnam	5,995	2.50%	Vietnam	345	1.64%
#3 country of origin	Haiti	2,160	0.90%	Guatemala	154	0.73%
#4 country of origin	Nigeria	2,097	0.87%	Nigeria	112	0.53%
#5 country of origin	Jamaica	1,870	0.78%	El Salvador	111	0.53%
#6 country of origin	Honduras	1,264	0.53%	Jamaica	101	0.48%
#7 country of origin	Laos	897	0.37%	Honduras	88	0.42%
#8 country of origin	Other Carribean	838	0.35%	Pakistan	67	0.32%
#9 country of origin	India	817	0.34%	Bangladesh	61	0.29%
#10 country of origin	Cambodia	706	0.29%	Costa Rica	50	0.24%

Data Source: Decennial Census, American Community Survey (HUD AFFHT0002)

Residents of the Clayton County R/ECAPs are three times as likely to be from Mexico than residents of the county, as a whole. There are also 5 National Origins (Guatemala, El Salvador, Pakistan, Bangladesh, and

Costa Rica) that are represented in the R/ECAP but are not populous enough to be noted in the county as a whole.

<b>Table 14: Comparison of Regional Population and Regional R/ECAPs</b>						
	<b>Atlanta-Sandy Springs-Roswell Region</b>			<b>Atlanta-Sandy Springs-Roswell R/ECAP</b>		
<b>Race/Ethnicity</b>		<b>#</b>	<b>%</b>		<b>#</b>	<b>%</b>
<b>White, Non-Hispanic</b>		2,684,570	50.78%		22,209	11.62%
<b>Black, Non-Hispanic</b>		1,684,178	31.86%		131,884	68.98%
<b>Hispanic</b>		547,894	10.36%		26,529	13.88%
<b>Asian or Pacific Islander, Non-Hispanic</b>		254,691	4.82%		6,891	3.60%
<b>Native American, Non-Hispanic</b>		10,779	0.20%		404	0.21%
<b>Other, Non-Hispanic</b>		13,749	0.26%		337	0.18%
<b>Family Type</b>		<b>#</b>	<b>%</b>		<b>#</b>	<b>%</b>
<b>Families with Children</b>		662,976	49.99%		19,445	51.42%
<b>National Origin</b>	<b>Nation</b>	<b>#</b>	<b>%</b>	<b>Nation</b>	<b>#</b>	<b>%</b>
<b>#1 country of origin</b>	Mexico	174,014	3.48%	Mexico	10,598	5.54%
<b>#2 country of origin</b>	India	50,770	1.02%	Burma	1,594	0.83%
<b>#3 country of origin</b>	Korea	34,848	0.70%	Ethiopia	1,307	0.68%
<b>#4 country of origin</b>	Jamaica	34,108	0.68%	Vietnam	1,266	0.66%
<b>#5 country of origin</b>	Vietnam	28,037	0.56%	Honduras	1,211	0.63%
<b>#6 country of origin</b>	China*	21,114	0.42%	Other South Central Asia	1,105	0.58%
<b>#7 country of origin</b>	El Salvador	19,166	0.38%	El Salvador	986	0.52%
<b>#8 country of origin</b>	Guatemala	18,337	0.37%	India	908	0.47%
<b>#9 country of origin</b>	Colombia	16,109	0.32%	Other Eastern Africa	693	0.36%
<b>#10 country of origin</b>	Nigeria	15,061	0.30%	Guatemala	668	0.35%
Data Source: Decennial Census, American Community Survey (HUD AFFHT0002)						
* Excluding Hong Kong and Taiwan						

The largest demographic in the region is Black, non-Hispanic, which makes up 68.98 percent of the R/ECAP population. These demographics are significantly different than the region where the Black, non-Hispanic population makes up 31.86 percent of the total population. The remaining racial and ethnic minority groups identified by HUD (Hispanic, Asian or Pacific Islander, Native American, Two or More Races, and Other) all have relatively similar representation within R/ECAPs and the region.

The R/ECAP tracts have a slightly higher rate of families with children than the regional population. In addition, the national origin of the residents differs in the R/ECAP tracts. The most populous National Origin is Mexico (same as the region as a whole) but the percentage of residents from this country is greater in R/ECAPs. The other countries of origin in the R/ECAPs differ significantly from the region as a whole with countries like Burma, Ethiopia, Honduras, Other South Central Asia, and Other Eastern Africa present.

**c. Describe how R/ECAPs have changed over time in the jurisdiction and region (since 1990).**

According to the HUD data mapping tool, the jurisdiction has not had any R/ECAPs identified since 1990.

**2. Additional Information**

**a. Beyond the HUD-provided data, provide additional relevant information, if any, about R/ECAPs in the jurisdiction and region affecting groups with other protected characteristics.**

According to the HUD-provided maps, there are not any R/ECAPs in the jurisdiction. However, using HUD's definition of a R/ECAP, an analysis of available data identifies census tracts that could qualify as R/ECAPs. The definition for a R/ECAP has two components: a racial/ethnic concentration threshold and a poverty test. The racial/ethnic concentration threshold requires that a tract have a non-white population of 50 percent or more. The poverty threshold can be passed in one of two ways. First, if a census tract has 40 percent or more of the population living below the poverty line then it is eligible to be a R/ECAP. However, if most of a region fits this definition, it is not helpful in identifying concentrations of poverty. To this end, HUD has come up with a second definition to pass the poverty threshold: a tract can be a R/ECAP if it has a poverty rate that is three or more times the average tract poverty rate for the metropolitan/micropolitan area.

Using the first poverty threshold, three census tracts fit the R/ECAP definition: 13063040303, 13063040415, and 13063040306.

- Census tract 13063040303 is located in the central north part of the County, east of Forest Park. It has a poverty rate of 40 percent and a non-White population of 66.34 percent. The predominant racial group in this tract is Black.
- Census tract 13063040415 is located in the Edgemoor West area to the west of Highway 3, with a poverty rate of 44.9 percent and a non-White population of 73.95 percent. The predominant racial group in this tract is Black.
- Census tract 13063040306 is located north of Plaza and to the east of Interstate 75. It has a poverty rate of 47.1 percent and has a non-White population of 55.04 percent. The predominant racial group in this tract is Hispanic.

**b. The program participant may also describe other information relevant to its assessment of R/ECAPs, including activities such as place-based investments and geographic mobility options for protected class groups.**

There are currently no HUD-identified R/ECAPs in Clayton County

**3. Contributing Factors to R/ECAPs**

*Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of R/ECAPs.*

- Community opposition
- Deteriorated and abandoned properties
- Displacement of residents due to economic pressures
- Lack of community revitalization strategies
- Lack of local or regional cooperation
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities



- Land use and zoning laws
- Location and type of affordable housing
- Loss of Affordable Housing
- Occupancy codes and restrictions
- Private discrimination
- Source of income discrimination
- Other

There are currently no R/ECAPs identified in Clayton County but some factors could contribute to the creation of R/ECAPs in the future. Anything that may increase poverty and racial segregation within an area could help create a R/ECAP. The factors here mirror those in the previous section on segregation.

Rising housing costs can lead to ***displacement of residents due to economic pressures***. As the cost of housing rises it can push out low-income residents, particularly renters who do not see rising housing costs as an increase in the value of their investment. When income is strongly linked to race or ethnicity this can lead to racial and ethnic segregation. Low-income residents gather together along racial and ethnic lines and are priced out of more affluent areas.

The ***location and type of affordable housing*** can further segregation in ways that are similar to the above points. Subsidized housing can be pushed into certain neighborhoods or census tracts, and if income is correlated with race or ethnicity that can create segregation. Per the 2011-2015 American Community Survey 5-Year Estimates, there are two census tracts with over 10 percent of households receiving subsidized housing. The first is southeast of Hartsfield-Jackson Airport and the second is west Jonesboro.

### 3. Disparities in Access to Opportunity

#### 1. Analysis

The following tables shows the opportunity indicators by race/ethnicity in Clayton County and the region, as well as by total population and the population below federal poverty line. According to HUD, “a higher score on each of the indices would indicate: lower neighborhood poverty rates; higher levels of school proficiency; higher levels of labor engagement; closer proximity to jobs; lower transportation costs; closer access to public transportation; and greater neighborhood environmental quality (i.e., lower exposure rates to harmful toxins).”

<b>Table: Opportunity Indicators by Race/Ethnicity (Clayton County)</b>							
	<b>Low Poverty Index</b>	<b>School Proficiency Index</b>	<b>Labor Market Index</b>	<b>Transit Index</b>	<b>Low Transportation Cost Index</b>	<b>Jobs Proximity Index</b>	<b>Environmental Health Index</b>
<b>Total Population</b>							
<b>White, Non-Hispanic</b>	30.31	23.00	29.07	67.68	40.35	42.25	12.07
<b>Black, Non-Hispanic</b>	27.52	22.49	29.04	71.40	42.94	37.32	11.96
<b>Hispanic</b>	20.15	22.49	23.14	73.25	46.90	47.66	10.02
<b>Asian/Pacific Islander</b>	30.94	23.78	27.43	70.40	44.58	44.36	7.58
<b>Native American</b>	27.78	21.83	29.71	70.70	43.82	42.78	13.89
<b>Population Below Federal Poverty Line</b>							
<b>White, Non-Hispanic</b>	23.67	23.08	22.64	72.02	46.28	48.81	10.35
<b>Black, Non-Hispanic</b>	23.01	22.17	25.66	73.15	45.47	40.04	10.37
<b>Hispanic</b>	13.01	22.15	18.37	74.82	49.33	53.18	7.81
<b>Asian/Pacific Islander</b>	35.45	23.13	32.53	69.24	45.71	51.36	7.43
<b>Native American</b>	5.70	28.02	13.32	69.73	54.63	82.93	N/A
Low Poverty Index Source: American Community Survey 5-Year Estimate 2006-2010 School Proficiency Index Source: Great Schools, 2012; Common Core of Data (4 <sup>th</sup> Grade Enrollment and School Addresses), 2012; School Attendance Boundary Information System (SABINS), 2012 Labor Market Engagement Index Source: American Community Survey 5-Year Estimate 2006-2010 Low Transportation Cost Index Source: Location Affordability Index (LAI) data, 2008-2012 Transit Index Source: Location Affordability Index (LAI) data, 2008-2012 Jobs Proximity Index Source: Longitudinal Employer-Household Dynamics (LEHD), 2010 Environmental Health Index Source: National Air Toxics Assessment (NATA) data, 2005 (HUD AFFHT0002)							

<b>Table: Opportunity Indicators by Race/Ethnicity (Region)</b>							
	<b>Low Poverty Index</b>	<b>School Proficiency Index</b>	<b>Labor Market Index</b>	<b>Transit Index</b>	<b>Low Transportation Cost Index</b>	<b>Jobs Proximity Index</b>	<b>Environmental Health Index</b>
<b>Total Population</b>							
<b>White, Non-Hispanic</b>	59.35	68.45	61.52	58.30	34.86	50.04	32.29
<b>Black, Non-Hispanic</b>	38.43	35.03	41.61	68.30	43.71	45.96	22.01
<b>Hispanic</b>	38.88	51.41	51.53	70.82	48.30	52.25	24.86
<b>Asian/Pacific Islander</b>	57.60	65.17	66.71	71.05	45.34	54.69	23.21
<b>Native American</b>	48.54	52.46	52.00	61.84	39.04	50.20	28.11
<b>Population Below Federal Poverty Line</b>							
<b>White, Non-Hispanic</b>	47.46	56.43	49.82	57.16	36.88	50.47	33.14
<b>Black, Non-Hispanic</b>	27.64	29.61	33.26	71.42	48.93	47.60	20.17
<b>Hispanic</b>	28.15	48.22	45.56	73.77	52.50	53.18	22.94
<b>Asian/Pacific Islander</b>	48.37	54.43	59.53	74.51	52.73	56.83	19.46
<b>Native American</b>	37.79	51.07	43.25	53.50	42.33	54.17	28.70
Low Poverty Index Source: American Community Survey 5-Year Estimate 2006-2010 School Proficiency Index Source: Great Schools, 2012; Common Core of Data (4 <sup>th</sup> Grade Enrollment and School Addresses), 2012; School Attendance Boundary Information System (SABINS), 2012 Labor Market Engagement Index Source: American Community Survey 5-Year Estimate 2006-2010 Low Transportation Cost Index Source: Location Affordability Index (LAI) data, 2008-2012 Transit Index Source: Location Affordability Index (LAI) data, 2008-2012 Jobs Proximity Index Source: Longitudinal Employer-Household Dynamics (LEHD), 2010 Environmental Health Index Source: National Air Toxics Assessment (NATA) data, 2005 (HUD AFFHT0002)							

#### a. Education

##### i. For the protected class groups HUD has provided data, describe any disparities in access to proficient schools in the jurisdiction and region.

The School Proficiency Index measures the proficiency of elementary schools and is determined by the performance of 4<sup>th</sup> graders on state exams. Index scores are 1-100, with a higher score indicating a higher ranked school system.

Scores are very low within Clayton County, and there is little variation among the various racial and ethnic demographics. For the total population in the county, Asian or Pacific Islanders have the highest score of 23.78 and Native Americans have the lowest score with 21.83. For the population below the poverty line in the county, Native Americans have the highest score with 28.02 and the Hispanic population has the

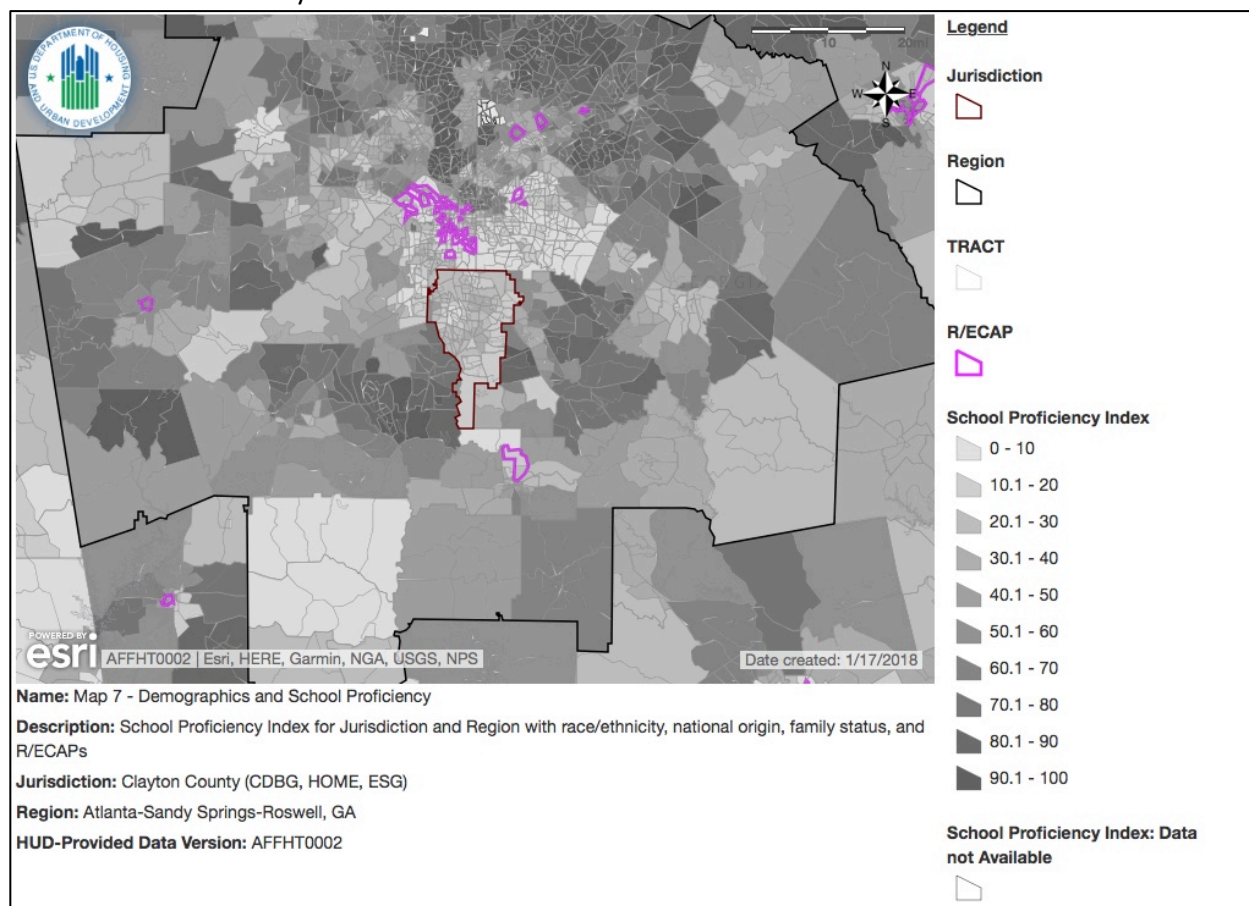
lowest score with 22.15.

In the Atlanta-Sandy Springs-Roswell region, scores are much higher and significantly more diverse based on race or ethnicity. For the total population of the region, the White, Non-Hispanic population has the highest score with 68.45 and the Black, Non-Hispanic population has the lowest score with 35.03. For the population below the poverty line in the region, the White, Non-Hispanic population again has the highest score with 56.43 and the Black, Non-Hispanic population has the lowest score with 29.61.

This points to relative uniformity of poor performing schools in Clayton County. The School Proficiency Index scores are higher throughout the region, but the Black, Non-Hispanic population has significantly reduced access to high quality education.

The following map displays the School Proficiency Index for the region. In this map, Clayton County clearly stands out as having a lower school proficiency score than the counties to the east and west.

MAP – School Proficiency



Source: HUD

**ii. For the protected groups HUD has provided data, describe how the disparities in access to proficient schools relate to residential living patterns in the jurisdiction and region.**

Within Clayton County, there are not any significant differences between protected groups, but location is still important to access higher quality schools. In general, the school proficiency index decreases as you move further away from Atlanta, though there are some pockets of lower scores near the city. The two highest scores in the region are both over 50 and located on the western border of the county; one is in the north and one is further south. The most noticeable geographic pattern is the difference in school proficiency at the county line. When you look at census tracts outside of Clayton County in the south and east the score jumps significantly, sometimes by 70 points.

**iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss programs, policies, or funding mechanisms that affect disparities in access to proficient schools.**

According to the 2013 Clayton County ConPlan, there are 2,275 homeless students in Clayton County, the vast majority of whom (1,836) live on the street. These students often lack the support necessary to attend proficient schools. There are institutions working to correct this issue, including Hope Shelter and the Clayton County Public Schools Homeless Education Department, but more resources are needed to expand programming to address the needs of the county. Additionally, the Clayton County Parks and Recreation Afterschool Program was developed and funded to support the needs of the County's LMI population.

Interviews conducted with local leaders by the County in 2017 found that the lack of educational opportunities is a major concern. In order for the community to have economic stability it needs a properly educated workforce to attract businesses. The County can work directly with local institutions of higher education, such as Clayton State and Atlanta Tech, to promote programs and inform residents about the opportunities in the region.

After losing its accreditation in 2008, the Clayton County school system has been gradually improving over the last decade. Despite having re-earned its accreditation in 2009, interviews with community members reveal a lingering stigma against the schools. Although the schools have improved, the school proficiency scores are still lower than in neighboring counties. There is a clear change when crossing county lines, particularly to the east and west.

## b. Employment

### i. For the protected class groups HUD has provided data, describe any disparities in access to jobs and labor markets by protected class groups in the jurisdiction and region.

The Labor Market Index and Job Proximity Index were analyzed to identify disparities in access to jobs and labor. The Labor Market Index is a measure of unemployment rate, labor-force participation rate, and the percent of the population (over 25 years old) with a Bachelor's degree. The Job Proximity Index measures the physical distance between where someone lives and their job, based on race. These two indices provide a snapshot of employment opportunity disparities in the region. The indices are scored 1-100 with a low value indicating lower access and a higher value indicated better access. Data was from the Opportunity Indicators, by Race/Ethnicity table found above in this section.

#### Jurisdiction

Within Clayton County's overall population, there is very little difference in the Labor Market Index between race and ethnic groups. The Hispanic population has the lowest score with 23.14 and the White, Non-Hispanic population has the highest score with 29.07. For the population below the poverty line, there is more diversity in Labor Market Index Scores, though all of them are still considered low. The Native American, Non-Hispanic population has the lowest score with 13.32 and the highest score is the Asian or Pacific Islander, Non-Hispanic population with a score of 32.53.

The Jobs Proximity Index is relatively consistent across the County. The Black, Non-Hispanic population has the lowest score with 37.32 and the Hispanic population has the highest Jobs Proximity Index score with 47.66. Again, there is a wider range of scores for the population below the poverty level there is more variety. The Native American, Non-Hispanic population has the highest score with 82.93, and the lowest score is the Black, Non-Hispanic population with 40.04.

#### Region

Within the region as a whole the access to jobs and labor is stronger than in Clayton County, particularly according to the Labor Market Index. The Labor Market Index scores in the region are approximately 20-30 points higher in the region, but there are still some discrepancies based on race or ethnicity, particularly for the Black, non-Hispanic population. For the overall population, the Black, non-Hispanic population has the lowest score with 41.61, which is 25 points lower than the highest score of 66.71 (Asian or Pacific Islander, non-Hispanic).

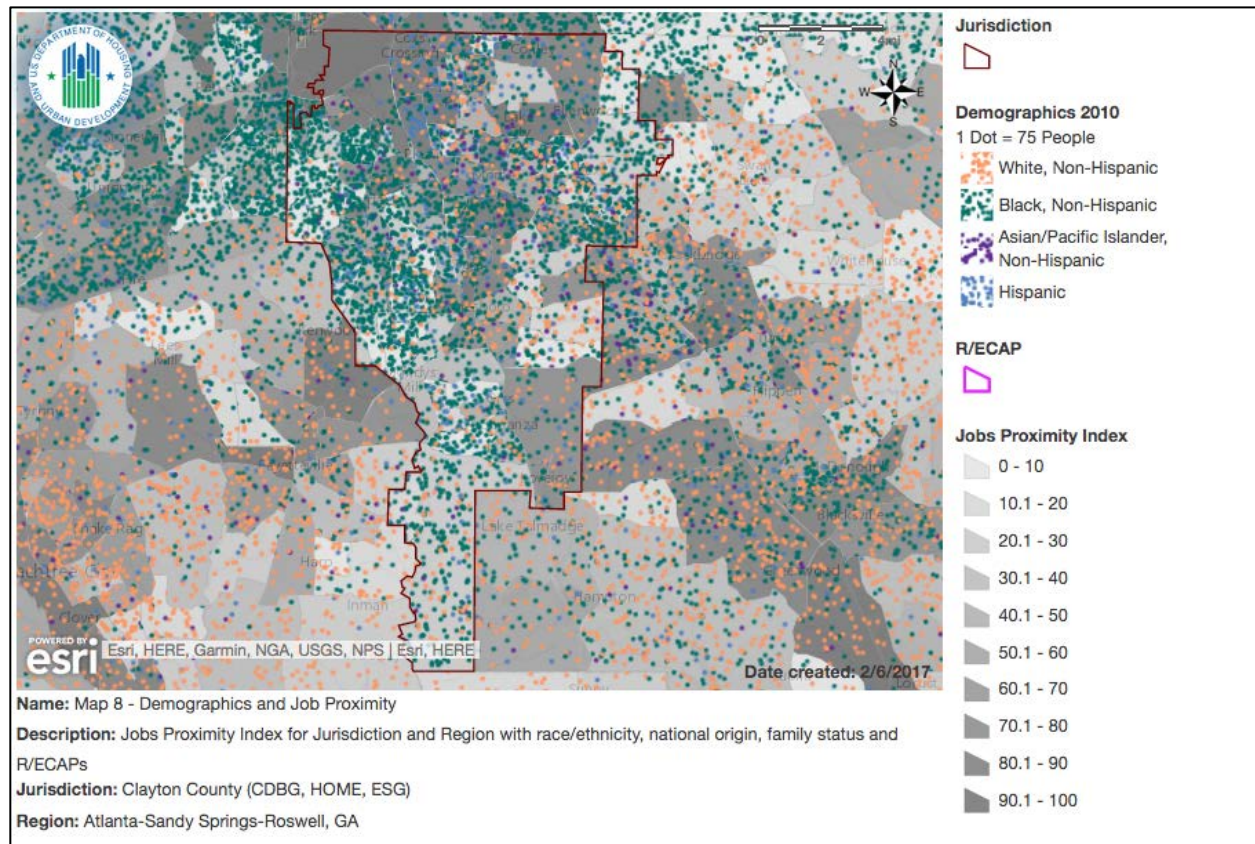
For residents who are below the federal poverty level a similar pattern exists at the region-level. The Black, non-Hispanic population has the lowest score with 33.26 and the Asian or Pacific Islander, non-Hispanic population has the highest with 59.53. This points to a disparity in access to labor markets for the Black, non-Hispanic population

The jobs proximity index is much more uniform across racial and ethnic groups. For the total population, there are less than 10 points that separate the lowest score (Black, non-Hispanic population with 45.96) and the highest score (Asian or Pacific Islander, non-Hispanic with 54.69). The scores are very similar for



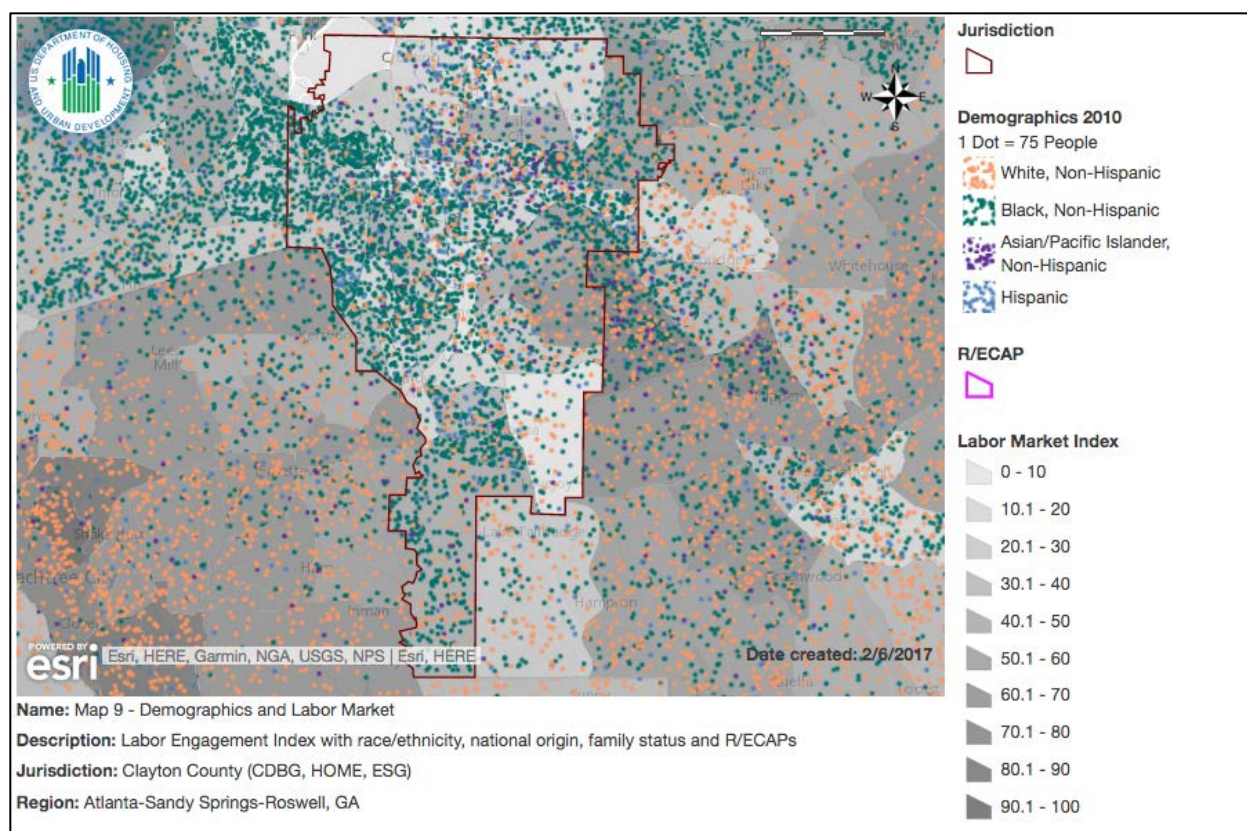
the population below the poverty level where the Black, non-Hispanic population has the lowest score with 47.60 and the Asian or Pacific Islander population has the highest score with 56.83. The overall situation in the region and jurisdiction is that there are fewer economic opportunities in Clayton County than the overall region, but there is less disparity in the County than the region.

MAP: Jobs Proximity



Source: HUD

MAP: Labor Market Index



Source: HUD

**ii. For the protected class groups HUD has provided data, describe how disparities in access to employment relate to residential living patterns in the jurisdiction and region.**

Access to employment is linked closely to residential living patterns. Residents who live near Atlanta or along the major interstates have greater access to employment. Additionally, access to public transportation that has a variety of times and pick-up locations can greatly effect access to employment opportunities. Low-income individuals have a greater dependence on public transportation to get jobs due to a lower rate of reliable personal automobile ownership. There are not any clear disparities in access to employment for protected class groups, but residents who live in more rural areas or away from major highways due have reduced access to employment.

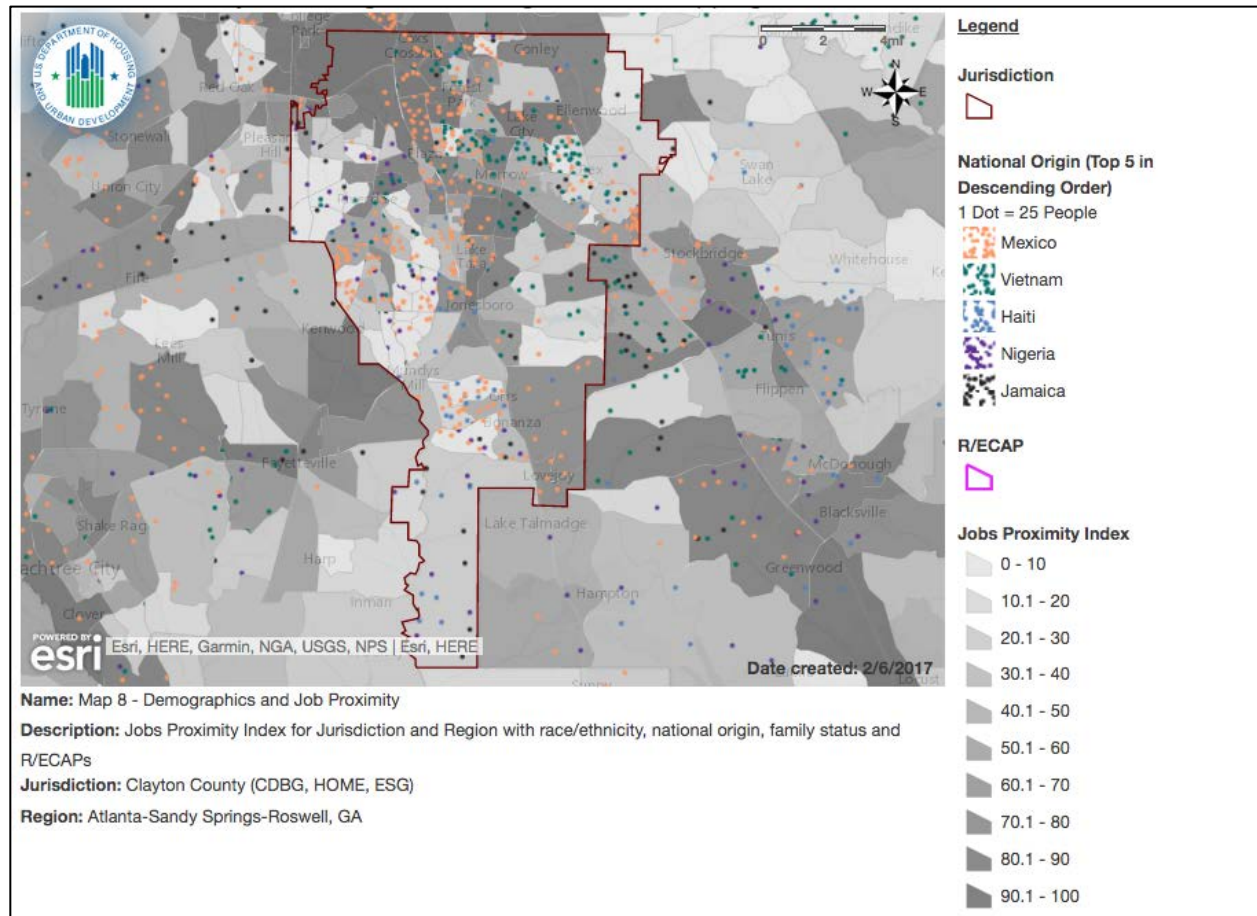
**iii. Which racial/ethnic, national origin, or family status groups are least successful in accessing employment?**

Using the available information there is little difference in access to employment by race or ethnicity. The Black, non-Hispanic population has the lowest Jobs Proximity Scores for the jurisdiction for the total population and the population below the poverty level, but the scores are still relatively close to the other racial groups. Additionally, the difference between the Native American, non-Hispanic population below the poverty levels high Jobs Proximity Index score (82.93) and Labor Market Index score (13.32) seems stark but this population is very small in the jurisdiction, making up only 0.21% of the total population.



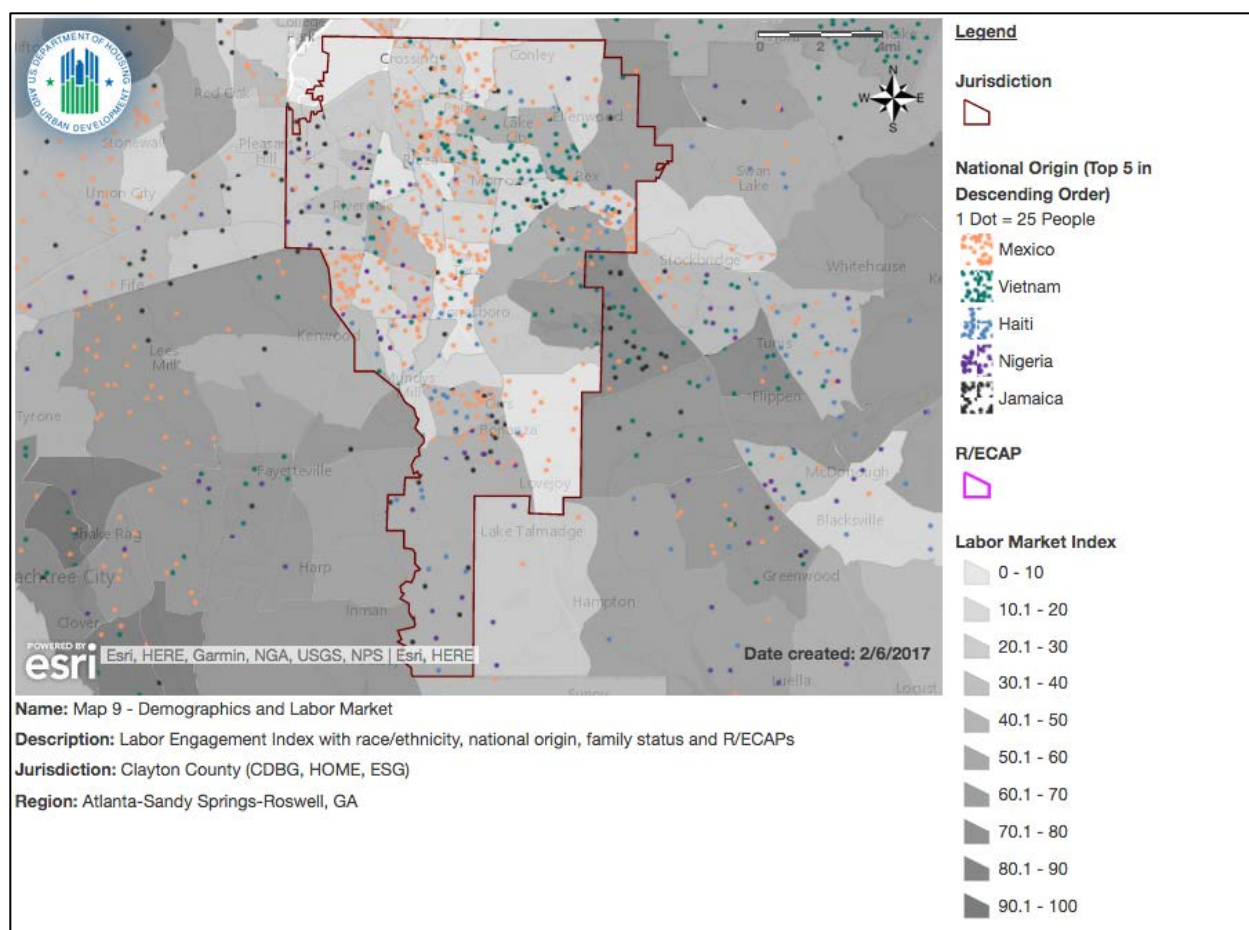
Using the HUD-mapping tool, it appears that the Haitian-born population tends to live in Census Tracts with a lower Jobs Proximity Index Scores. There does not appear to be any difference in the Jobs Proximity index based on family status. The Haitian-born population also tends to live in Census tracts with a lower Labor Market Index score and, again, there is no clear difference in Labor Market scores based on family status. Overall, it appears that there is little variation by protected class but the Black, non-Hispanic population and the Haitian-born population may be the least successful at accessing employment.

MAP: Jobs Proximity, National Origin



Source: HUD

MAP: Labor Market Index, National Origin



Source: HUD

**iv. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to employment.**

The 2011 Clayton County Analysis of Impediments to Fair Housing recognized public transportation as vital for low-income residents to access employment. According to the 2011-2015 American Community Survey, 2,574 workers use public transportation to commute to work in Clayton County. These commuters are overwhelmingly Black (88.2 percent) and earn less than \$35,000 per year (61.5 percent). According to the 2013 Clayton County ConPlan, the loss of the County subsidized "C-Tran" bus service in 2010 has isolated "communities comprised of low- and moderate-income households and limited their access to employment opportunity and services." However, there is still access to employment outside the county via the GRTA Xpress on six bus lines to downtown Atlanta.

In March 2017, Clayton County conducted a series of interviews with local leaders to determine the needs of the community. The lack of opportunity to find quality employment was identified as an important issue facing the County. Clayton County staff may not have the necessary training to help assist residents with this issue.



### c. Transportation

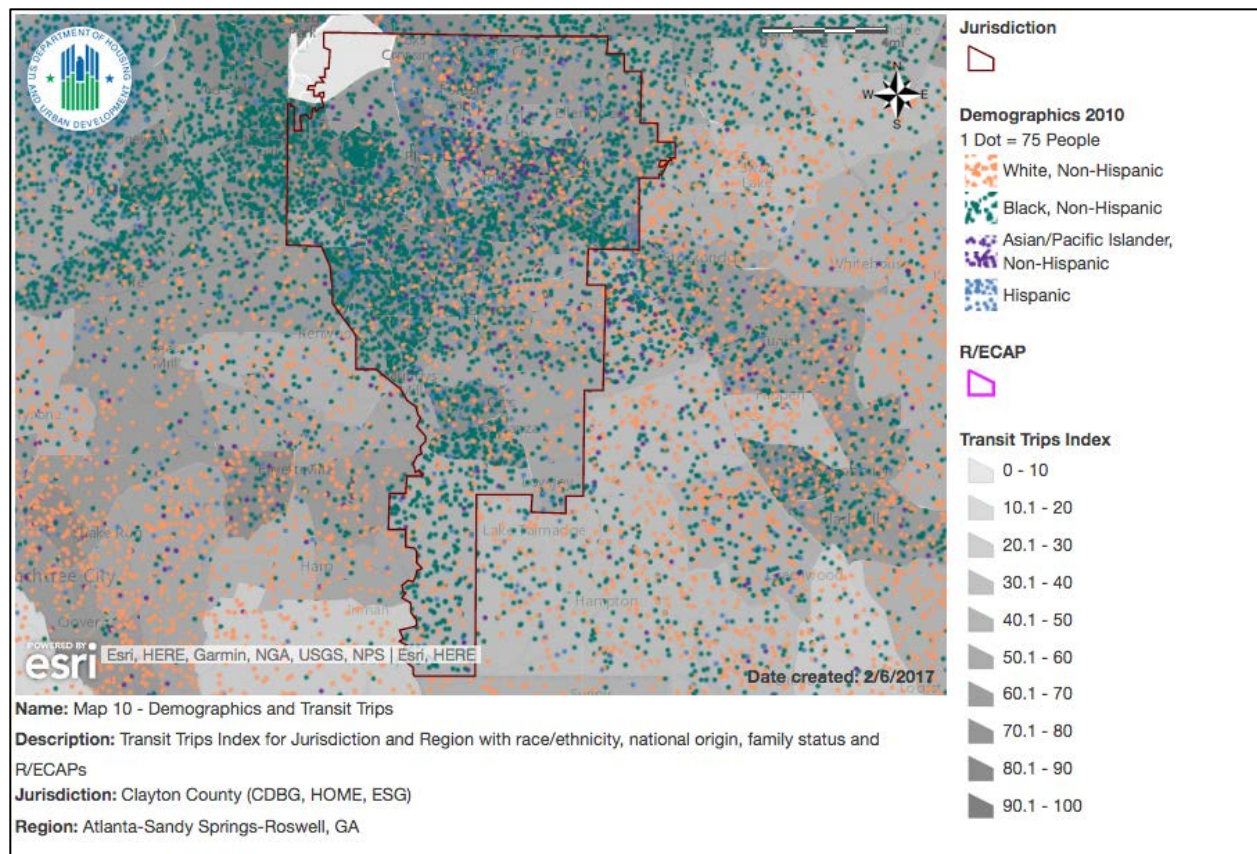
#### i. For the protected class groups HUD has provided data, describe any disparities in access to transportation related to costs and access to public transit in the jurisdiction and region.

The Transit Index and Low Transportation Cost Index scores for Clayton County were analyzed to identify disparities in access to transportation and access to public transportation. The Transit Index measures how often low-income families use public transportation and the Low Transportation Cost Index measures the cost of transportation. The indices are scored 0-100 with a low value indicating high use of public transportation and high transportation cost and a higher value indicate low use of public transportation and low transportation cost.

Within Clayton County, there is very little difference in the Transit Index between race and ethnic groups. The White, Non-Hispanic population has the lowest score with 67.68 and the Hispanic population has the highest score with 73.25. For the population below the poverty line, the scores are similar. The lowest score is the Asian or Pacific Islander, Non-Hispanic population with a score of 69.24 and the highest score is the Hispanic population with 74.82.

The Low Transportation Cost Index is relatively consistent across the County. The White, Non-Hispanic population has the lowest score with 40.35 and the Hispanic population has the highest score with 46.90. For the population below the poverty level there is slightly more variation. The Native American, Non-Hispanic population has the highest score with 54.63 and the lowest score is the Black, Non-Hispanic population with 45.47. Data was from the Opportunity Indicators, by Race/Ethnicity table found above in this section.

MAP: Transit Trips Index, Race/Ethnicity



Source: HUD

MAP: Low Transportation Cost Index, Race/Ethnicity





Source: HUD

## ii. Which racial/ethnic, national origin or family status groups are most affected by the lack of reliable, affordable transportation connection between their place of residence and opportunities?

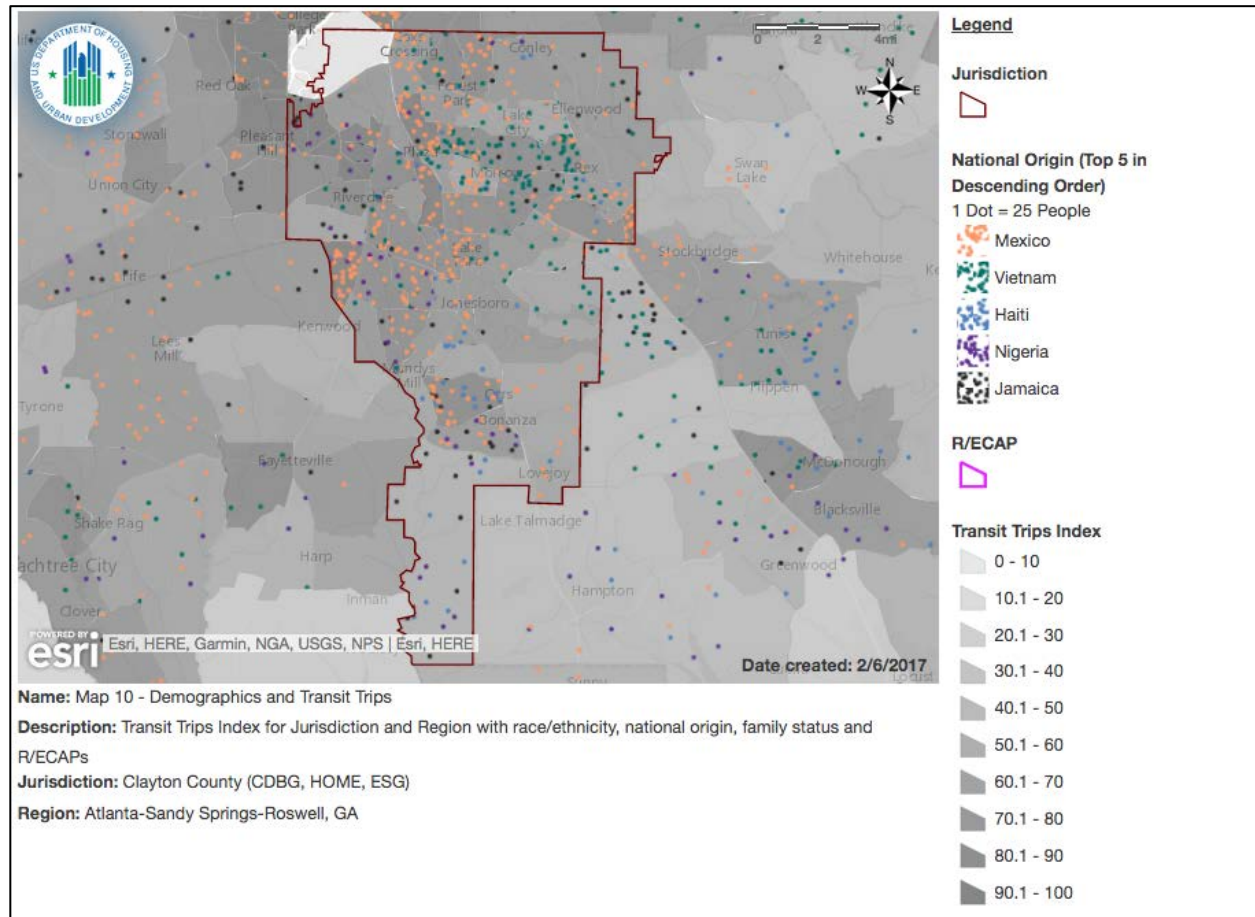
Within the jurisdiction's total population the White, non-Hispanic population is most affected by the lack of reliable, affordable transportation. This population had the lowest score in both the Transit Index and the Low Transportation Cost Index. For the population below the poverty line in the jurisdiction the Black, non-Hispanic population had the lowest Low Transportation Cost score and the Asian or Pacific Islander, non-Hispanic population had the lowest Transit Index score.

Demographics were similar region-wide. Again, the White, non-Hispanic population had the lowest scores in both indexes for the population as a whole. For the population below the poverty line in the region, the White, non-Hispanic population had the lowest scores in both indexes. Overall, scores were very similar regardless of race or ethnicity but the White, non-Hispanic population appears to be more affected by the lack of reliable, affordable transportation than other groups.

When looking at National Origins within the jurisdiction the HUD-provided maps show little variation by origin, but the Vietnamese population appears to have slightly less access to affordable transportation by census tracts. Census tracts with fewer families with children appear to more often live in areas with lower access to affordable transportation than tracts with more families with children.

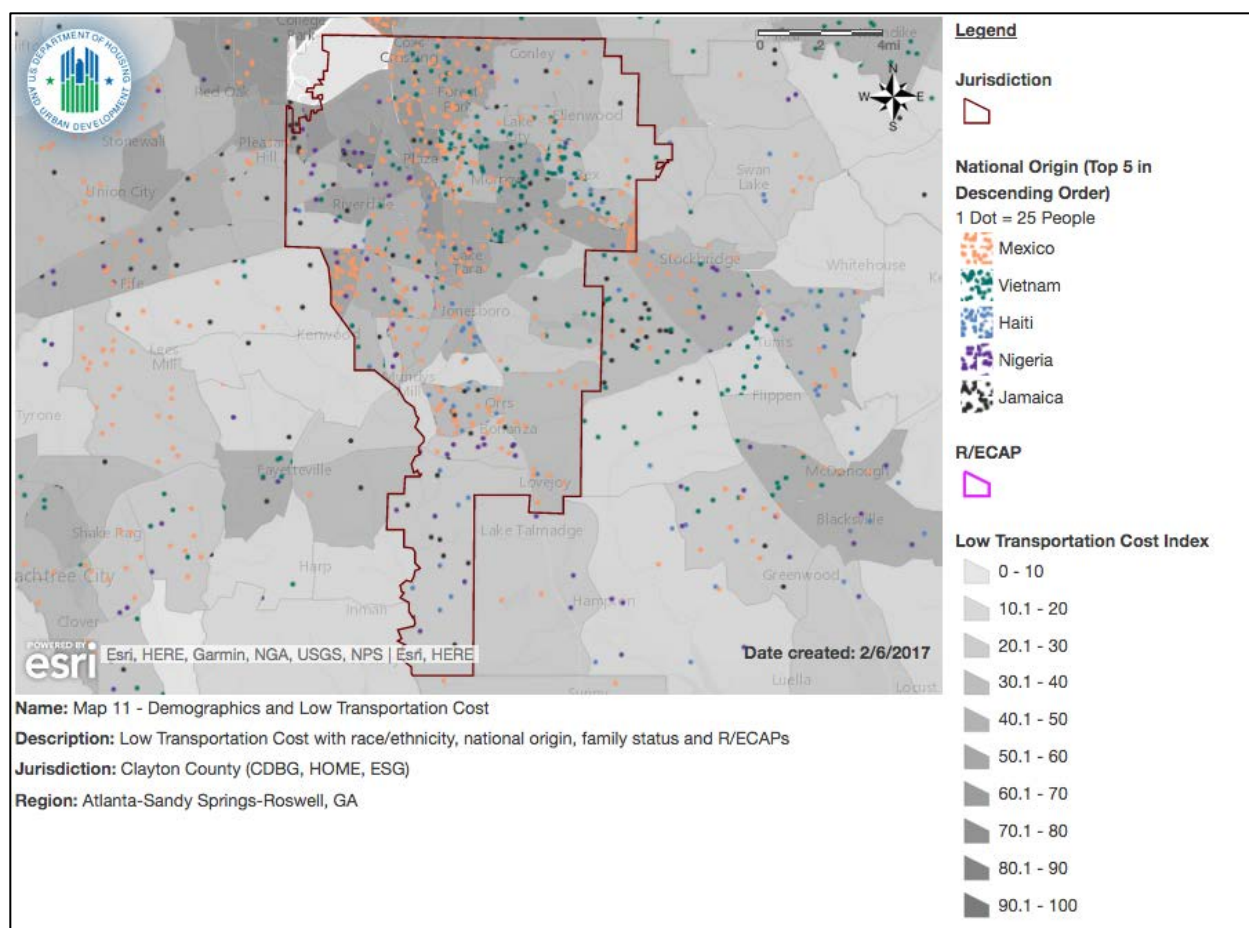
Regionwide, the Mexico-born population appears to have less access to reliable, affordable transportation than other groups based on national origin. There does not appear to be any difference in access to transportation based on family status in the region.

MAP: Transit Trips Index, National Origin



Source: HUD

MAP: Low Transport Cost Index, National Origin



Source: HUD

**iii. For the protected class groups HUD has provided data, describe how disparities in access to transportation relate to residential living patterns in the jurisdiction and region.**

There are no protected classes that face disparities in access to transportation related to living patterns in the jurisdiction. As noted above, the cessation of the C-Tran bus has reduced access to public transportation for many households in low- and moderate-income areas.

**iv. Informed by community participation, any consultation with other relevant government agencies, and the participants own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to transportation.**

Public transportation options are severely lacking in Clayton County, particularly since 2010. There are still some transportation options into Atlanta, but navigating around the County to and from places of employment is difficult, particularly for low-income households that are more often dependent on public transportation.



In March 2017, Clayton County conducted a series of interviews with local leaders to determine the needs of the community. One of the major issues brought up was public transportation in the region. There has been considerable improvement in the last years, but the timeframes that MARTA is available could still be improved. Currently, the hours of operation do not match up with the commuting needs of the community.

#### d. Access to Low Poverty Neighborhoods

##### i. For the protected class groups HUD has provided data, describe any disparities in access to low poverty neighborhoods in the jurisdiction and region.

The HUD-provided data include the Low Poverty Index, which uses rates of family poverty by household to measure exposure to poverty. A higher score generally indicates less exposure to poverty and a lower score generally indicates high exposure to poverty. Data was from the Opportunity Indicators, by Race/Ethnicity table found above in this section.

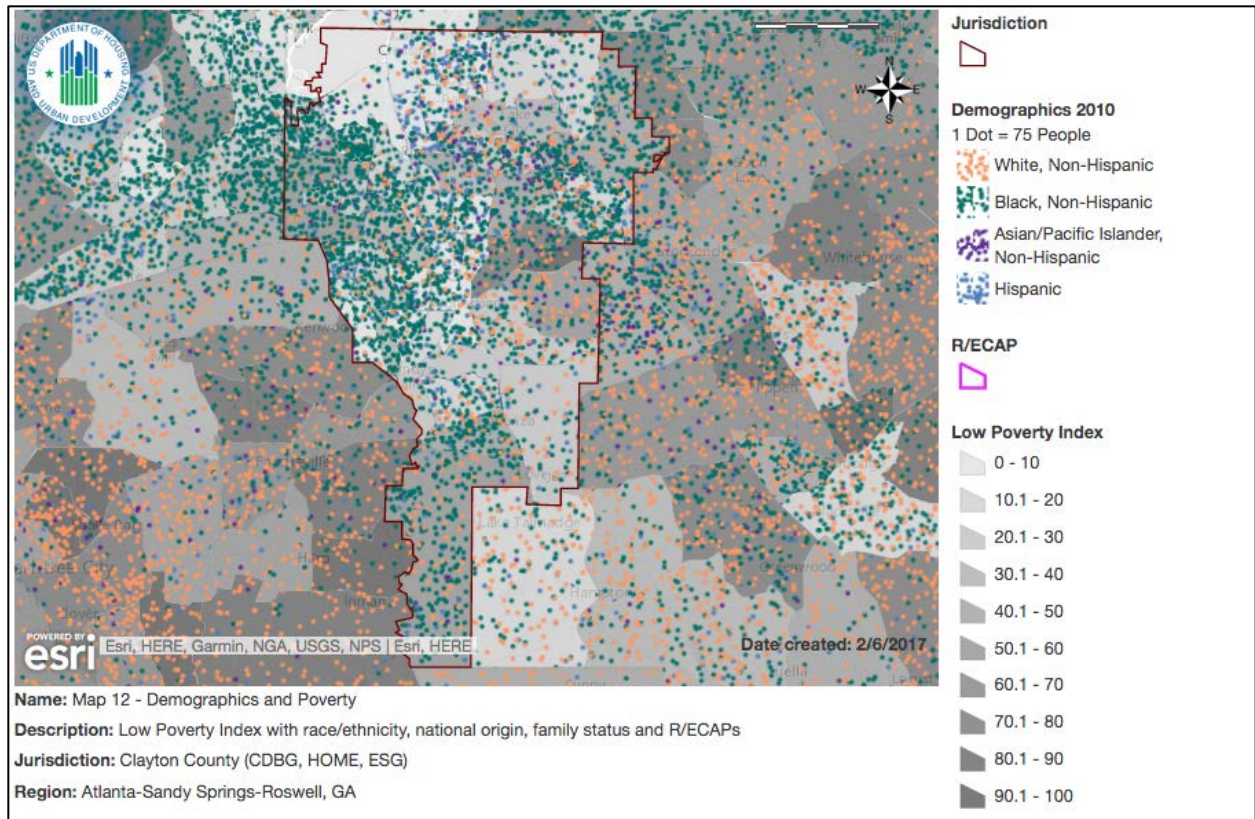
In Clayton County, there is little variance in exposure to poverty based on racial/ethnic demographics. The Hispanic population has the lowest score of 20.15, which means they are exposed to more poverty than other racial or ethnic groups. White and Asian or Pacific Islander populations have the highest scores on the Low Poverty Index, 30.31 and 30.94, respectively.

Scores on the Low Poverty Index are lower across all racial/ethnic demographics for the population below the federal poverty line. The Native American has the lowest score with 5.70, and the Asian or Pacific Islander populations have the highest score with 35.45.

##### ii. For the protected class groups HUD has provided data, describe how disparities in access to low poverty neighborhoods relate to residential living patterns in the jurisdiction and region.

According to the HUD Opportunity Indicators, by Race/Ethnicity table, there is little variety in access to low poverty neighborhoods based on racial or ethnic identity. However, the neighborhood that a person lives in can have a large impact on access to low poverty neighborhoods. The map below visualizes the low poverty index across the county. The lowest scores tend to be in the northern part of the county and in the central area near Jonesboro. These areas, particularly the census tracts near the airport, tend to have a higher Hispanic population than tracts with high access to low poverty neighborhoods.

MAP: Low Poverty Index, Race/Ethnicity



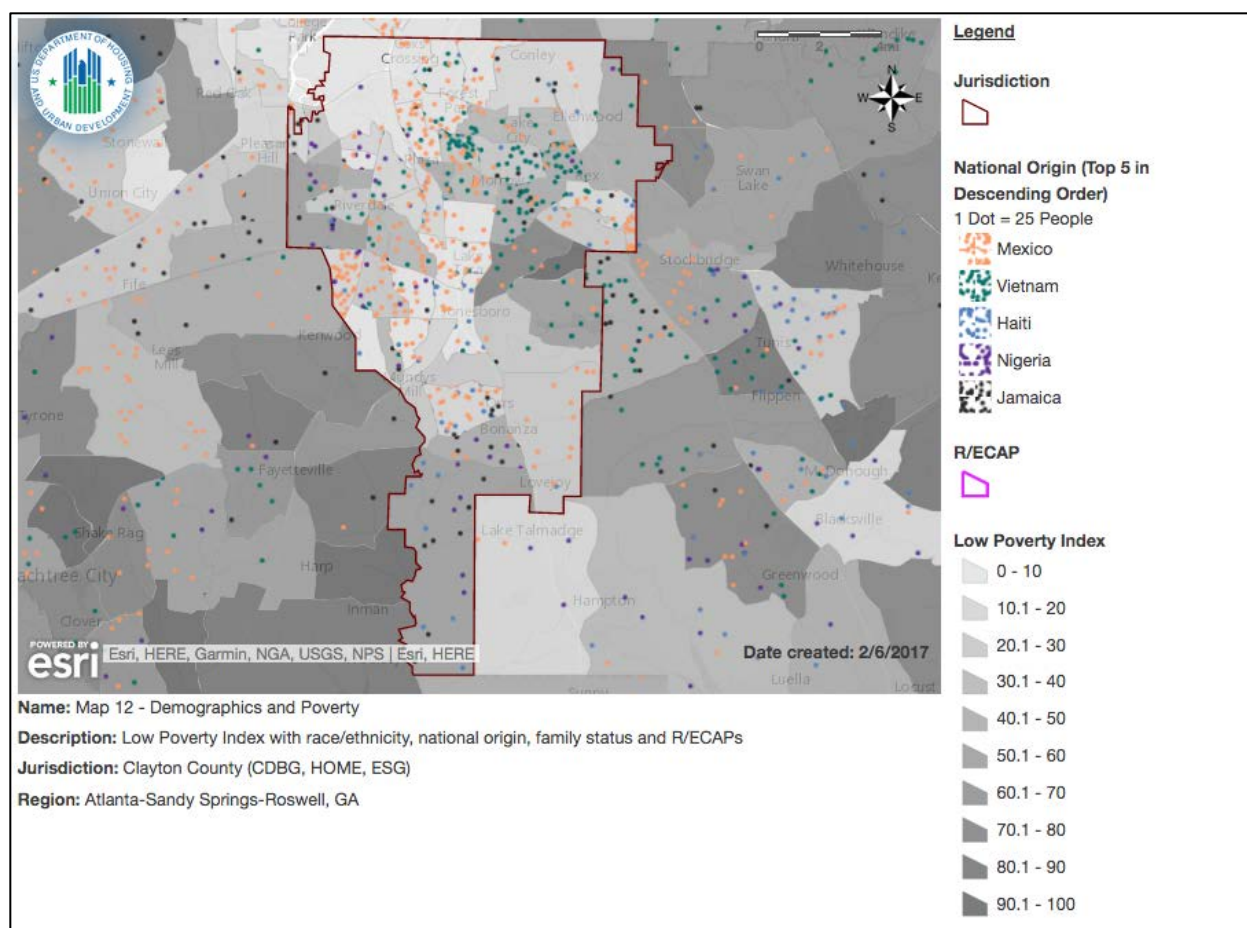
Source: HUD

### iii. Which racial/ethnic, national origin or family groups are most affected by these poverty indicators?

According to the Low Poverty Index the Hispanic population is most affected by low poverty. The Hispanic population in the jurisdiction has the lowest score for the total population (20.15) and second lowest score for the population below the poverty level (13.01). Region-wide the Hispanic population fares better but they have the second lowest score overall (38.88) and second lowest for the population below the poverty line (28.15).

The HUD-provided Map Demographics and Poverty visualizes poverty and national origin and family status. Within the jurisdiction, of the top five National Origins listed two stand out as having reduced access to low poverty census tracts, residents from Mexico and residents from Haiti. Regionwide, a similar pattern is seen. Residents from Mexico and El Salvador tend to be absent from low poverty census tracts. At both the jurisdiction and regional level there is no clear pattern for poverty by family size. Overall, the group that stands out as most affected by poverty indicators are the Hispanic population. Particularly residents born in Mexico.

MAP: Low Poverty Index, National Origin



Source: HUD

**iv. Informed by community participation, any consultation with other relevant government agencies, and the participants own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to low poverty neighborhoods.**

Previously, Clayton County has had significant issues with blight and code enforcement, but things are improving on that front. There is still more work to be done, but the increased focus in the last five years has helped improve many impoverished areas.

The location of public housing can contribute to disparities in access to low poverty neighborhoods. Public housing policies can often consolidate poverty into specific neighborhoods and limit the ability of people to live in low poverty areas. Public housing, and the issues surrounding it, are discussed elsewhere in this document.

#### e. Environmentally Healthy Neighborhoods

##### i. For the protected class groups HUD has provided data, describe any disparities in access to environmentally healthy neighborhoods in the jurisdiction and region.

Environmental Health Index scores are compared to determine disparities among racial and ethnic groups in access to environmentally healthy neighborhoods. The index measures exposure based on EPA estimates of air quality carcinogenic, respiratory, and neurological toxins. Data was from the Opportunity Indicators, by Race/Ethnicity table found above in this section.

#### Jurisdiction

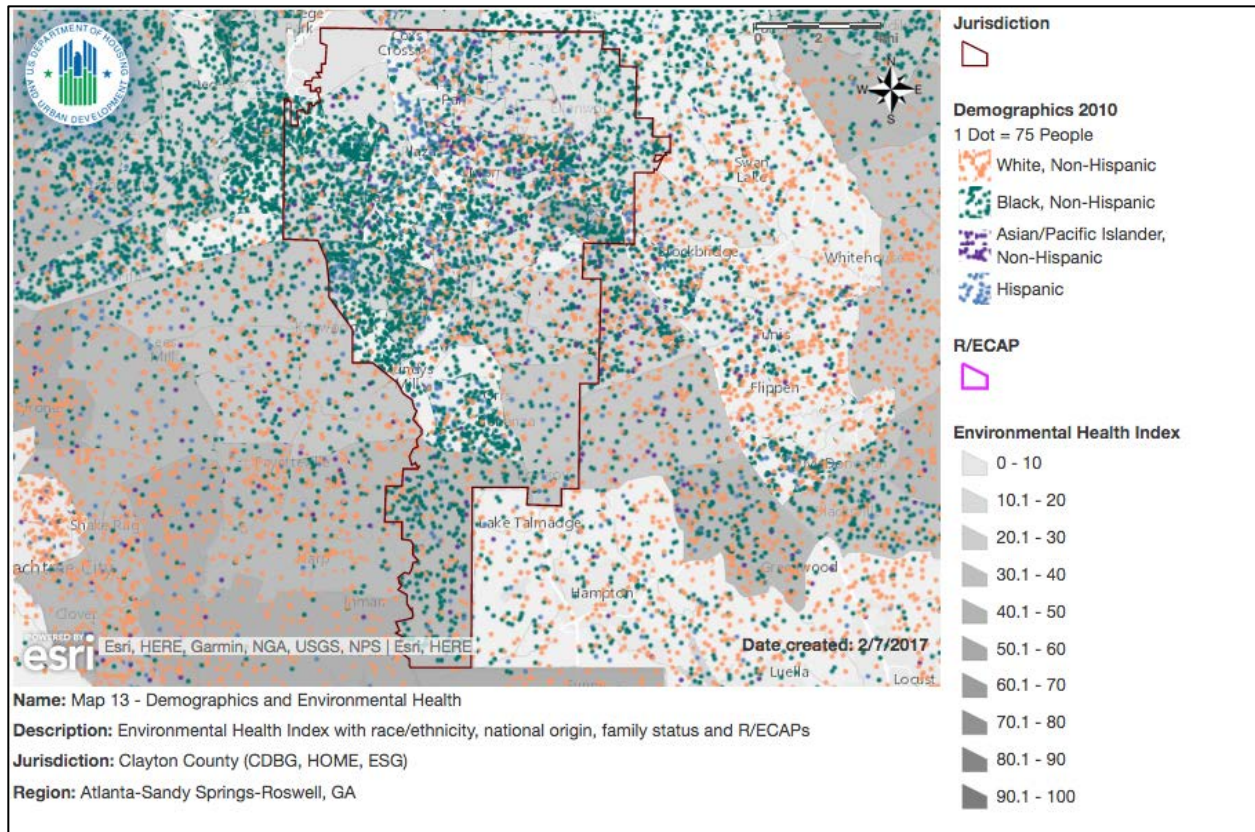
Within Clayton County, there is very little variation among racial/ethnic groups in Environmental Health Index scores in the overall population. Each racial and ethnic group has a very low score. The highest score is the Native American, Non-Hispanic population, with 13.89, and the lowest score is the Asian or Pacific Islander, Non-Hispanic population, with a score of 7.58. For the population below the poverty line the Black, Non-Hispanic population has the highest score (10.37) and the Asian or Pacific Islander, Non-Hispanic population has the lowest score (7.43).

#### Region

The region as a whole has similar patterns as the County. There is little variance between protected classes when it comes to Environmentally Healthy neighborhoods, but the index numbers are higher for the region than the county. The highest score for the total population of the region is the White, non-Hispanic population with a score of 36.95. The lowest score is the Black, non-Hispanic population with a score of 26.58. For the population below the poverty line there is a wider variance in scores. The White, non-Hispanic population again has the greatest access to environmentally healthy neighborhoods with a score of 37.51. The population with the lowest score is the Asian or Pacific Islander, non-Hispanic population with a score of 23.12. These differences are not large, but it does show a pattern of slight disparity in access to environmentally healthy neighborhoods due to the White, non-Hispanic population consistently having the highest score.

MAP: Environmental Health Index, Race/Ethnicity





Source: HUD

ii. For the protected class groups HUD has provided data, describe how disparities in access to environmentally healthy neighborhoods relate to residential living patterns in the jurisdiction and region.

There are no groups that have noticeably less access to environmentally healthy neighborhoods.

iii. Informed by community participation, any consultation with other relevant government agencies, and the participants own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to environmentally healthy neighborhoods.

According to the 2013 Clayton County ConPlan, the Atlanta Regional Commission Plan 2040 was considered when preparing the ConPlan. Plan 2040 works to coordinate planning within the region between local governments and conservation or environmental protection groups to manage areas identified as regionally important.

## 2. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about disparities in access to opportunity in the jurisdiction and region affecting groups with other protected characteristics.

Clayton County does not have significant disparities in access to opportunities within the jurisdiction. There is no additional information at this time.

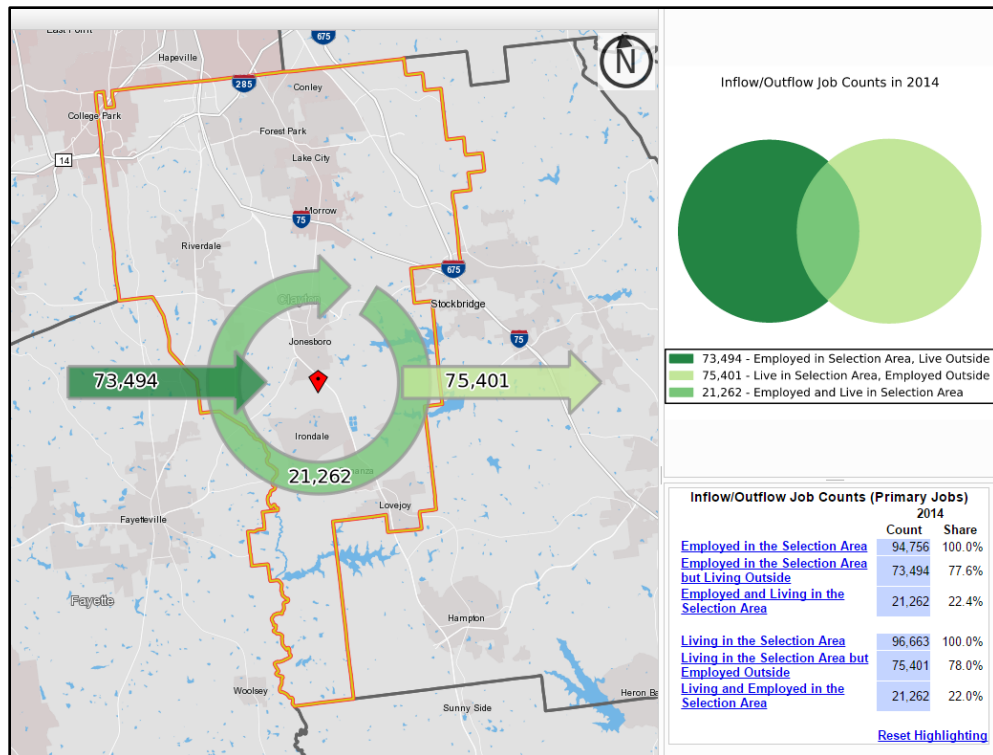
**b. The program participant may also describe other information relevant to its assessment of disparities in access to opportunity, including any activities aimed at improving access to opportunities for areas that may lack such access, or in promoting access to opportunity (e.g., proficient schools, employment opportunities, and transportation).**

Per the 2013 Clayton County ConPlan, the multi-family housing stock in the jurisdiction is primarily geared towards renters, lacks diversity, and is aging quickly. There is a considerable need for more diverse, affordable homes in order to disburse poverty and reduce the incidence of families who are cost burdened.

Clayton County has made a commitment to reducing poverty in the county and has partnered with other MSA counties to address the issue. The major factors for poverty in the county are: community facilities, transportation, economic opportunities and jobs, and housing. These issues are all interrelated.

An analysis of commuting patterns within Clayton County shows that providing greater housing and employment opportunities within the county can help with transportation issues. Individuals who cannot afford housing near their work must commute significant distances, which increases traffic, pollution, and strain on public investments. Long distance commuting also reduces opportunities for non-private vehicle commuting such as public transportation, cycling, and walking.

The following map shows the number of people who commute into Clayton County for work, those who commute out of Clayton County for work, and those that work and live within the County in 2014. There are appears to be a significant disconnect between work and home locations. Over 75,000 residents of Clayton County work outside of the county and nearly 73,500 workers commute into Clayton County to work. Only 21,262 residents live and work in Clayton County.



Source: US Census Bureau

### 3. Contributing Factors to Disparities in Access to Opportunity

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disparities in access to opportunity.

- Access to financial services
- Availability, type, frequency, and reliability of public transportation
- Impediments to mobility
- Lack of access to opportunity due to high housing costs
- Lack of private investments in specific neighborhoods, including services or amenities
- Lack of local or regional cooperation
- Land use and zoning laws
- Lending discrimination
- Location and type of affordable housing
- Location of employers
- Location of environmental health hazards
- Location of proficient schools and school assignment policies
- Loss of Affordable Housing
- Occupancy codes and restrictions
- Private discrimination
- Source of income discrimination
- Other

**Access to financial services** creates disparities in opportunities within Clayton County. As shown in the



HMDA Analysis below (in the Disproportionate Housing Needs section), Black and Hispanic applicants are denied at greater rates than White applicants. This may point to ***lending discrimination*** within the region. Lack of access to financial services can be an insurmountable obstacle when trying to get a loan to purchase a new home or move out of a low opportunity area.

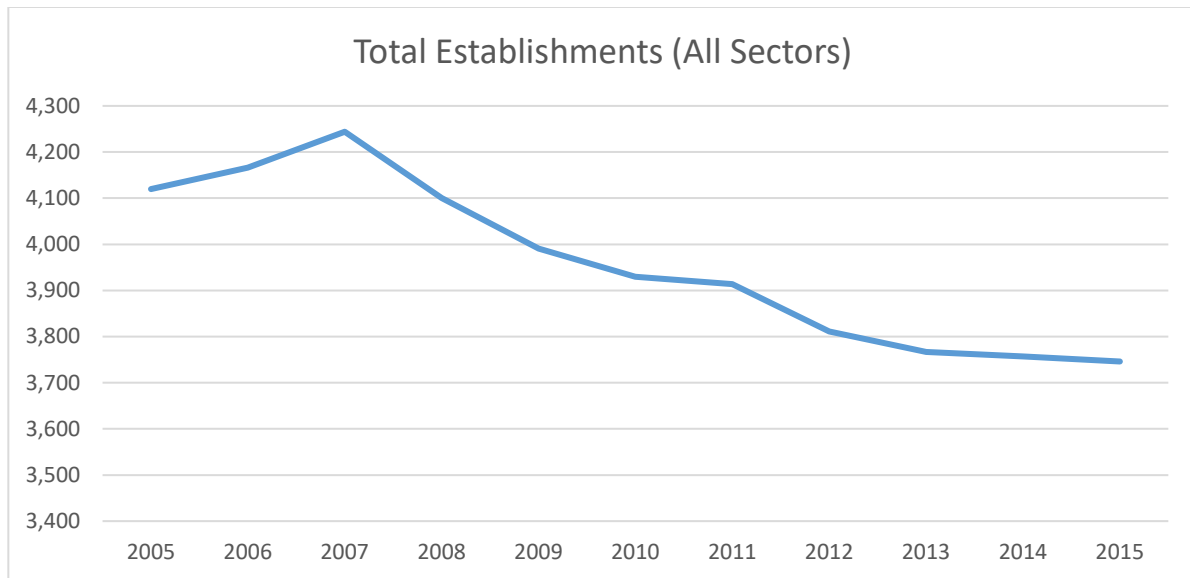
***The availability, type, frequency, and reliability of public transportation*** is a major issue in Clayton County. A large portion of the working population commutes, particularly into Atlanta. Reliable transportation that is available when and where workers need it, particularly low-income workers, is essential to the community.

The ***location of employers*** and ***location and type of affordable housing*** are interrelated issues that contribute to disparities in opportunity. Areas with economic opportunities lack the housing necessary for the workforce, which increases commute times and limits opportunities for low-income individuals.

There is a perception that there is a ***lack of public investment in specific neighborhoods***. One measure of this is the number of parks in certain neighborhoods. The following table displays the distribution of different types of parks in tracts below the county median income and above the county median income. Overall, there appears to be greater public investment in higher income census tracts.

<b>TABLE: Clayton County Parks by Median Income Census Tracts</b>			
	# in Below Median Income Census Tracts	# in Above Median Income Census Tracts	Difference
Regional Parks	4	4	0
Neighborhood Parks	4	6	2
Greenways*	1	2	--
International Park	0	1	1
Recreational Centers	2	2	0
* The Jesters Creek Greenway travels through census tracts that are both below median income and above median income. The Rivers Edge Greenway is only in a census tract with above median income Sources: Clayton County Parks and Recreation, American Community Survey 5-Year Estimates 2011-2015			

According to community interviews there is a perception that there is a ***lack of private investment in specific neighborhoods***. While the data doesn't show which neighborhoods are facing reduced private investment, there has been a steady decrease in business establishments throughout Clayton County since 2007. The following chart displays total establishments in the county by year, after growth until 2007 the county has decreased steadily to an all time low in 2015 with only ~3,750 establishments.



As mentioned early in this report, the ***location of proficient schools*** does not appear to cause a disparity in access to opportunities within Clayton County. However, schools neighboring counties to the east and west are significantly more proficient.

#### 4. Disproportionate Housing Needs

##### 1. Analysis

**a. Which protected class groups (by race/ethnicity and familial status) experience higher rates of housing problems (cost burden, overcrowding, or substandard housing) when compared to other groups for the jurisdiction and region? Which groups also experience higher rates of severe housing cost burdens when compared to other groups?**

##### Race/Ethnicity

According to the HUD-provided data, 44.57 percent of all households in Clayton County experience at least one of the four housing problems. Over 56 percent of Hispanic families experience housing problems, the highest rate of any race or ethnicity. The race/ethnicity with the second highest rate of housing problems are “Other, Non-Hispanic” with 51.58 percent. White, Non-Hispanic families have the lowest rate of experiencing housing problems with 30.63 percent.

##### Family Status

Families with five or more people face housing problems at a much higher rate (61.2%) than other household types or size. Family households with fewer than five people face housing problems at the lowest rate, 38.54 percent.

TABLE: Demographics of Households with Disproportionate Housing Needs

Disproportionate Housing Needs	(Clayton County, GA CDBG, HOME, ESG) Jurisdiction			(Atlanta-Sandy Springs-Roswell, GA) Region		
Households experiencing any of 4 housing problems	# with problems	# households	% with problems	# with problems	# households	% with problems
Race/Ethnicity						
White, Non-Hispanic	4,573	14,929	30.63%	295,526	1,060,274	27.87%
Black, Non-Hispanic	27,162	58,230	46.65%	290,077	610,123	47.54%
Hispanic	4,535	8,033	56.45%	76,061	135,669	56.06%
Asian or Pacific Islander, Non-Hispanic	1,326	3,382	39.21%	31,618	81,647	38.73%
Native American, Non-Hispanic	80	245	32.65%	1,863	4,442	41.94%
Other, Non-Hispanic	589	1,142	51.58%	10,668	25,383	42.03%
<i>Total</i>	<i>38,325</i>	<i>85,985</i>	<i>44.57%</i>	<i>705,860</i>	<i>1,917,580</i>	<i>36.81%</i>
Household Type and Size						
Family households, <5 people	17,139	44,474	38.54%	348,585	1,105,657	31.53%

Family households, 5+ people	7,127	11,645	61.20%	93,825	200,309	46.84%
Non-family households	14,060	29,869	47.07%	263,395	611,579	43.07%
<b>Households experiencing any of 4 Severe Housing Problems</b>	<b># with severe problems</b>	<b># households</b>	<b>% with severe problems</b>	<b># with severe problems</b>	<b># households</b>	<b>% with severe problems</b>
<b>Race/Ethnicity</b>						
White, Non-Hispanic	2,232	14,929	14.95%	137,309	1,060,274	12.95%
Black, Non-Hispanic	14,787	58,230	25.39%	155,374	610,123	25.47%
Hispanic	2,931	8,033	36.49%	47,671	135,669	35.14%
Asian or Pacific Islander, Non-Hispanic	981	3,382	29.01%	17,382	81,647	21.29%
Native American, Non-Hispanic	30	245	12.24%	724	4,442	16.30%
Other, Non-Hispanic	335	1,142	29.33%	5,767	25,383	22.72%
<i>Total</i>	<i>21,335</i>	<i>85,985</i>	<i>24.81%</i>	<i>364,295</i>	<i>1,917,580</i>	<i>19.00%</i>
<p>Note 1: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%.</p> <p>Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.</p> <p>Note 3: Data Sources: CHAS</p> <p>Note 4: Refer to the Data Documentation for details (<a href="http://www.hudexchange.info">www.hudexchange.info</a>).</p>						

**b. Which areas in the jurisdiction and region experience the greatest housing burdens? Which of these areas align with segregated areas, integrated areas, or R/ECAPs and what are the predominant race/ethnicity or national origin groups in such areas?**

#### Jurisdiction

The HUD provided maps show Housing Burden and Race/Ethnicity, as well as Housing Burden and National Origin. The Census Tracts in the jurisdiction have some significantly different percentage of households with high housing burden. There are ten census tracts in three areas that experience the greatest housing burden. Tracts are considered relatively integrated if their demographics are similar to the jurisdiction as a whole.

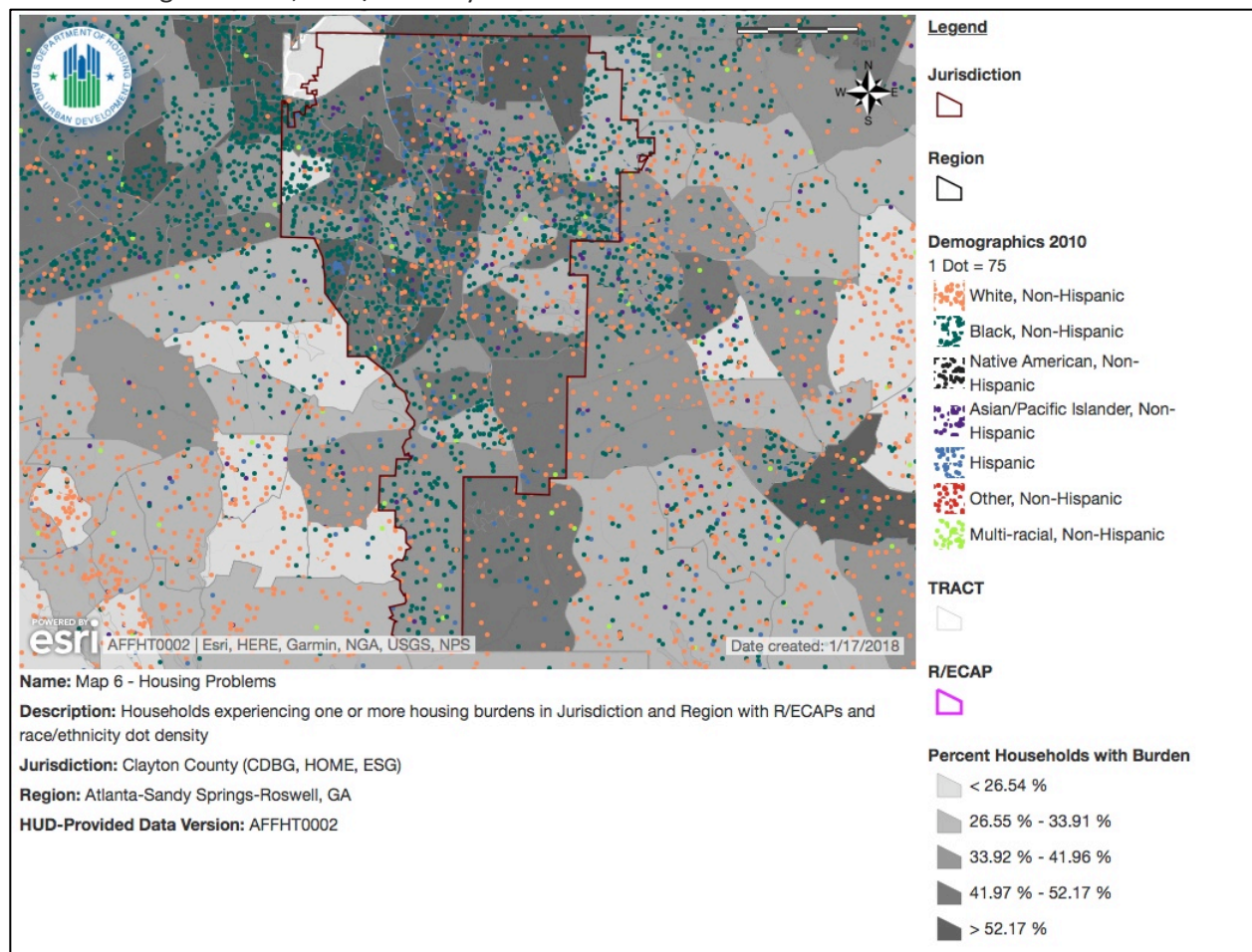
The first area is in the northeast and consists of one census tract (040410). This area has 55.21% of households with housing problems, for a total of 1,245 households. These tracts are relatively integrated and are 57.7% Black, non-Hispanic and 24% Hispanic. The predominant national origin in this area is Mexico.

The second area is a cluster of tracts in the central part of the jurisdiction that includes six census tracts with over 50% of the households facing housing problems (040306, 040520, 040519, 040522, 040416, and 040417). These tracts are relatively integrated with 68.5% Black, non-Hispanic and 19.13% Hispanic. The predominant national origin in this area is Mexico.

The third area is a cluster of tracts in the central western part of the jurisdiction that includes three census tracts with over 50% of the households facing housing problems (040514, 040516, and 040619). These tracts are relatively integrated with 71.7% Black, non-Hispanic and 15.6% Hispanic. The predominant national origin in this area is Mexico.

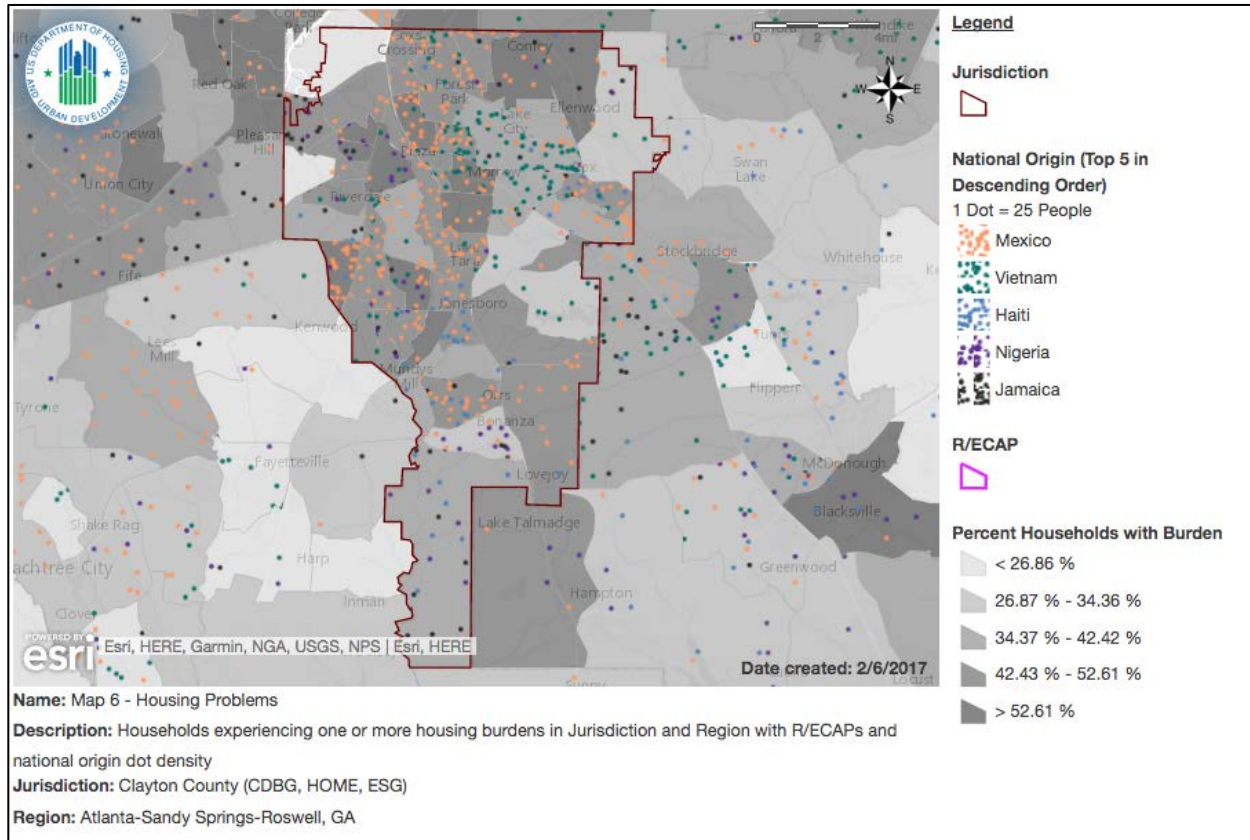
Overall, there are several areas of the jurisdiction that have significant housing burden they do not appear to be segregated areas.

MAP: Housing Problems, Race/Ethnicity



Source: HUD

MAP: Housing Problems, National Origin



Source: HUD

According to the HUD-provided map and data, there are ten census tracts with a high rate of housing burdens (52.61% or greater). The following table displays demographic data for these census tracts.

TABLE: Households with Housing Problems and Race/Ethnicity by Key Census Tracts				
Census Tract	Households with Housing Problems	Theil Index	Black, Non-Hispanic	Hispanic
13063040410	55.21%	0.26	57.72%	23.97%
13063040306	61.89%	0.12	33.17%	57.57%
13063040520	53.92%	0.11	91.38%	3.96%
13063040519	59.62%	0.03	92.07%	2.65%
13063040522	55.46%	0.14	70.28%	8.77%
13063040416	53.52%	0.13	39.91%	26.78%
13063040417	57.65%	0.14	67.95%	17.36%
13063040514	57.50%	0.39	67.99%	24.85%
13063040516	58.33%	0.15	72.94%	8.36%
13063040619	53.03%	0.07	77.97%	9.16%
Clayton County	44.57%	0.24	65.15%	13.66%



Source: Decennial Census 2010

Out of the ten identified census tracts with a disproportionately high level of housing problems, seven have relatively high minority populations. Three have high Black, Non-Hispanic populations and four have relatively high Hispanic populations. A population is considered disproportionately high if the population is 10 percent higher than the county as a whole.

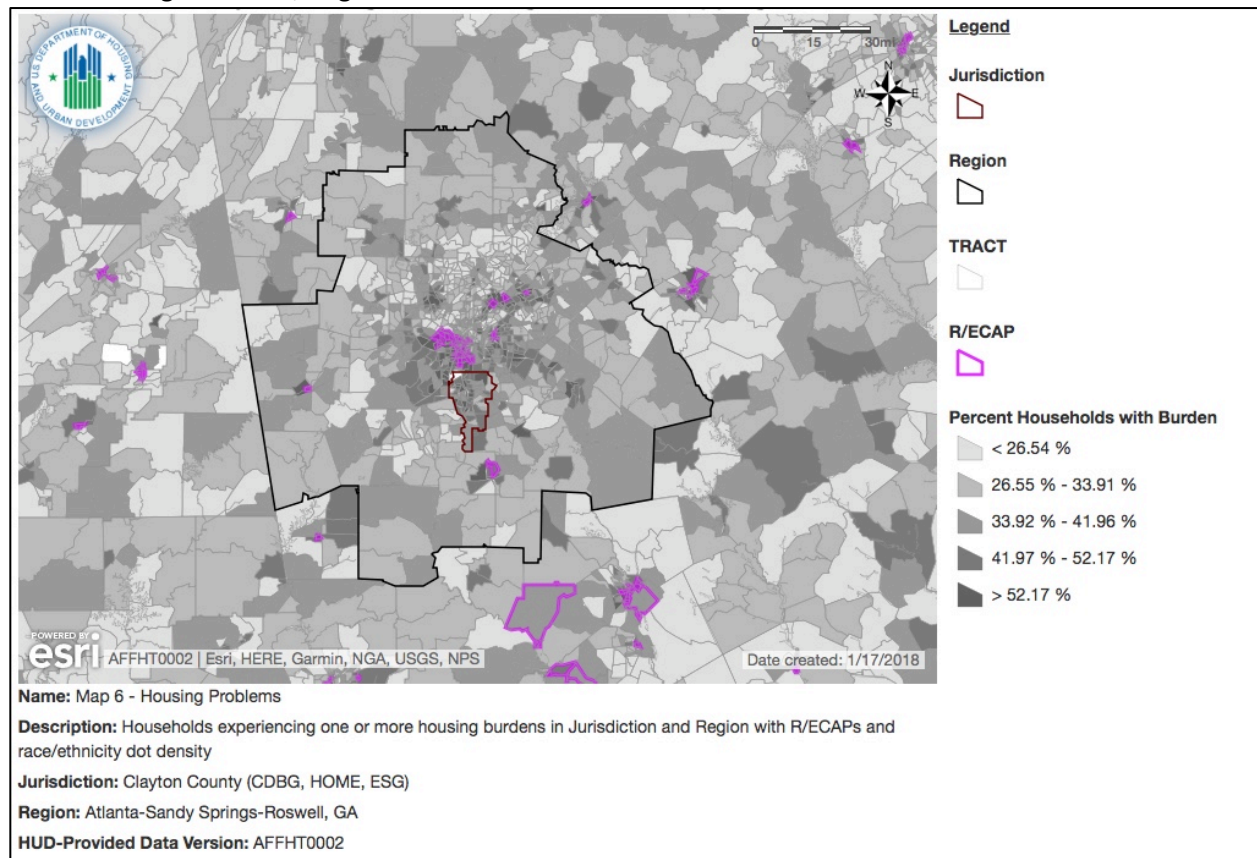
### Region

Regionwide there are three general areas that have high housing burdens. The first is the south, eastern, and western Atlanta area that includes the Clayton County jurisdiction. This area includes 27 R/ECAP tracts and the most populous National Origin is Mexico. This area is fairly segregated and the predominant race is Black, non-Hispanic.

The second area is to the north of Atlanta and stretches to the east. There are two R/ECAP tracts in this area and it is a segregated area that has a disproportionately high Hispanic and Asian/Pacific Islander, non-Hispanic population. The primary national origin in this area is Mexico.

The third area is south of Clayton County and is a pocket of high housing burden tracts that includes one R/ECAP. The most populous national origin in this area is Mexico, but that group is relatively small. This area is not particularly segregated but the Black, non-Hispanic population is the most prevalent.

MAP: Housing Problems, Region





Source: HUD

**c. Compare the needs of families with children for housing units with two, and three or more bedrooms with the available existing housing stock in each category of publicly supported housing for the jurisdiction and region.**

Publicly supported housing in Clayton County provides a variety of housing options for residents. Nearly half (47.22%) of the publicly supported housing stock is homes with three or more bedrooms and is suitable for larger families. Approximately 16 percent of the homes are 0 or 1 bedroom, which is more suitable for single individuals or couples without children. Overall, there are appropriate home options for the households who utilize the programs: 1,709 of the families have children and 2,302 of the households have 2 or more bedrooms.

Publicly supported housing is provided primarily through the HCV Program. Of the 2,732 units, 2,086 (or 76.35%) are through the HCV Program. Public Housing is the smallest program in the County, with only 29 units.

**d. Describe the differences in rates of renter and owner occupied housing by race/ethnicity in the jurisdiction and region.**

According to the 2011-2015 American Community Survey 5-Year Estimates, 52.7 percent of the occupied housing units in Clayton County are owner-occupied. There is a correlation between race and housing tenure. White, Non-Hispanic and Asian households are much more likely to be homeowners than Black or Hispanic households. The following table displays housing tenure in Clayton County by race/ethnicity.

TABLE: Housing Tenure by Race/Ethnicity		
	Owner-Occupied Housing	Renter Occupied Housing
White, Non-Hispanic	72.6%	27.4%
Black	47.3%	52.7%
Asian	76.2%	23.8%
Hispanic	48.4%	51.6%
Clayton County	52.7%	47.3%
Source: 2011-2015 American Community Survey		

**2. Additional Information**

**a. Beyond the HUD-provided data, provide additional relevant information, if any, about disproportionate housing needs in the jurisdiction and region affecting groups with other protected characteristics.**

**Lending Practices**

Countywide lending practices were analyzed using data gathered from lending institutions in compliance with the Home Mortgage Disclosure Act (HMDA). The HMDA was enacted by Congress in 1975 and is implemented by the Federal Reserve Board as Regulation C. The intent of the Act is to

provide the public with information related to financial institution lending practices and to aid public officials in targeting public capital investments to attract additional private sector investments.

Since enactment of the HMDA in 1975, lending institutions have been required to collect and publicly disclose data regarding applicants including: location of the loan (by Census tract, County, and MSA); income, race and gender of the borrower; the number and dollar amount of each loan; property type; loan type; loan purpose; whether the property is owner-occupied; action taken for each application; and, if the application was denied, the reason(s) for denial. Property types examined include one-to-four family units, manufactured housing and multi-family developments.

HMDA data is a useful tool in accessing lending practices and trends within a jurisdiction. While many financial institutions are required to report loan activities, it is important to note that not all institutions are required to participate. Depository lending institutions - banks, credit unions, and savings associations – must file under HMDA if they hold assets exceeding the coverage threshold set annually by the Federal Reserve Board, have a home or branch office in one or more metropolitan statistical areas (MSA), originated at least one home purchase or refinancing loan on a one-to-four family dwelling in the preceding calendar year. Such institutions must also file if they meet any one of the following three conditions: status as a federally insured or regulated institution; originates a mortgage loan that is insured, guaranteed, or supplemented by a federal agency; or originator of a loan intended for sale to Fannie Mae or Freddie Mac. For-profit, non-depository institutions (such as mortgage companies) must file HMDA data if: their value of home purchase or refinancing loans exceeds 10 percent of their total loan originations or equals or exceeds \$25 million; they either maintain a home or branch office in one or more MSAs or in a given year execute five or more home purchase, home refinancing, or home improvement loan applications, originations, or loan purchases for properties located in MSAs; or they hold assets exceeding \$10 million or have executed more than 100 home purchase or refinancing loan originations in the preceding calendar year.

It is recommended that the analysis of HMDA data be tempered by the knowledge that no one characteristic can be examined in isolation, but must be considered in light of other factors. For instance, while it is possible to develop conclusions simply on the basis of race data, it is more accurate when all possible factors are considered, particularly in relation to loan denials and loan pricing. According to the FFIEC, “with few exceptions, controlling for borrower-related factors reduces the differences among racial and ethnic groups.” Borrower-related factors include income, loan amount, lender, and other relevant information included in the HMDA data. Further, the FFIEC cautions that the information in the HMDA data, even when controlled for borrower-related factors and the lender, “is insufficient to account fully for racial or ethnic differences in the incidence of higher-priced lending.” The FFIEC suggests that a more thorough analysis of the differences may require additional details from sources other than HMDA about factors including the specific credit circumstances of each borrower, the specific loan products that they are seeking, and the business practices of the institutions that they approach for credit.

The following analysis is provided for Clayton County, summarizing 2015 HMDA data (the most recent

year for which data are available) and data between 2007 and 2015 where applicable. Where specific details are included in the HMDA records, a summary is provided below for loan denials including information regarding the purpose of the loan application, race of the applicant and the primary reason for denial. For the purposes of analysis, this report focuses only on the information available and does not make assumptions regarding data that are not available or were not provided as part of the mortgage application or in the HMDA reporting process.

## 2015 County Overview

In 2015, there were roughly 9,100 applications for loans to purchase, refinance or make improvements to single family homes in Clayton County. Of those applications, approximately 3,100 or 35 percent were approved and originated, an increase of nearly 650 originations from 2014 and a percentage increase of 26 percent (higher than the national rate of 22%). Of the remaining 5,900 applications, approximately 2,200 or 24 percent of all applications were denied for reasons identified below. While many loan applications are denied for more than one reason, HMDA data reflect only the primary reason for the denial of each loan. The balance of the approximately 3,700 applications that were neither originated nor denied were closed for one of the following reasons: a) the loan was approved but not accepted by the borrower; b) the application was closed because of incomplete information or inactivity by the borrower; or c) the application may have been withdrawn by the applicant.

<b>Disposition of Application by Loan Type and Purpose, 2015</b>				
<b>Single Family Homes (excluding manufactured homes)</b>				
	Loan Type	Home Purchase	Refinance	Home Improvement
Total Applications				
	Conventional	852	1,832	667
	FHA	3,074	1,494	32
	VA	443	663	14
	FSA/RHS	3	0	0
Loans Originated				
	Conventional	414	676	155
	FHA	1,052	399	15
	VA	176	240	7
	FSA/RHS	0	0	0
Loans Approved but not accepted				
	Conventional	33	50	21
	FHA	61	36	0
	VA	12	13	0
	FSA/RHS	0	0	0
Applications Denied				

	Conventional	164	655	470
	FHA	301	369	9
	VA	79	153	5
	FSA/RHS	2	0	0
Applications Withdrawn				
	Conventional	91	230	10
	FHA	317	237	0
	VA	67	100	1
	FSA/RHS	1	0	0
Files Closed for Incompleteness				
	Conventional	61	119	10
	FHA	140	144	0
	VA	17	98	1
	FSA/RHS	0	0	0
Source: 2015 HMDA				

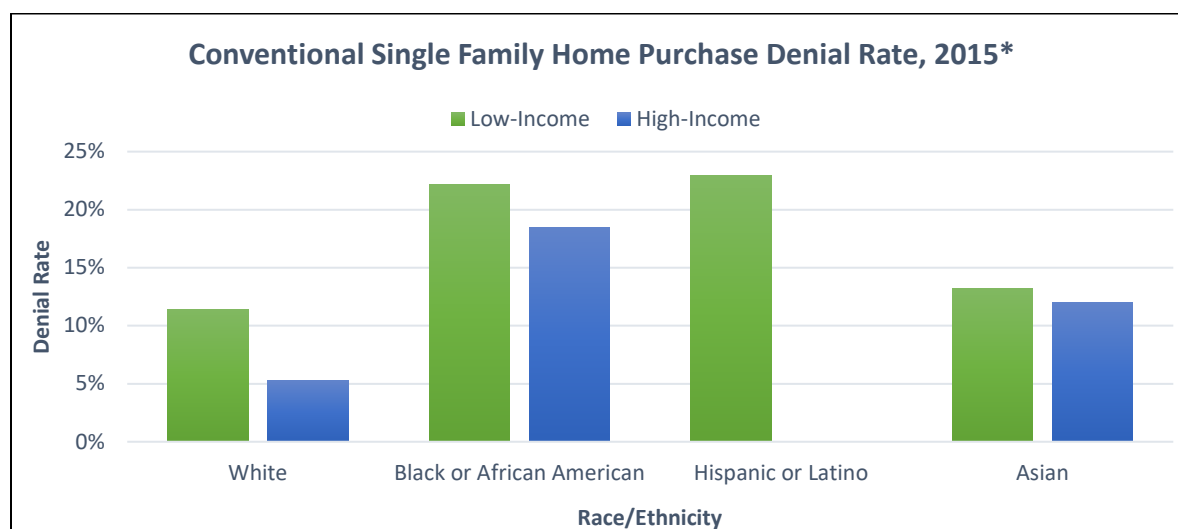
Of the home purchase loans for single-family homes that were originated in 2015 (1,600 loans originated), approximately 25 percent were provided by conventional lenders – down from nearly a third in 2014. The remaining 75 percent were provided by federally backed sources including the FHA and VA. The FHA and VA lenders had application/approval ratios of 32 percent and 38 percent, respectively. Conventional lenders originated 37 percent of all applications for home purchase loans.

A further examination of the 2,200 denials indicates that over half (53%) were for applicants seeking to refinance existing mortgages for owner-occupied, primary residences. The number one reason for denial of refinance applications was credit history (22% of refi. denials), followed closely by lack of collateral (21% of refi. denials). Typically, homeowners seeking to refinance their existing home mortgage are able to use their home as collateral. When the denial reason given for a refinance is a lack of collateral, this would indicate the home is worth less than the existing mortgage and, therefore, refinancing is not an option – these homes are commonly referred to as “under-water” or the borrowers are “upside-down” in their mortgage. The 2015 share of refinance denials attributable to lack of collateral increased slightly from 19 percent in 2014. Incomplete credit application was the third most prevalent denial reason for refinance applications, at 19 percent in 2015 (the same percentage as 2014).

The rate of loan application denials for traditional home purchase loans for one-to-four family housing in Clayton County, representing 25 percent of the County’s denial total, varies by race/ethnic groups. It should be noted that the majority of conventional home purchase applicants in 2015 were Black (nearly 55%), while non-Hispanic White (19%), Asian (16%), and Hispanic (10%) applicants were represented by smaller sample sizes. In 2015, Whites were least likely to be denied for conventional single-family home purchases, being denied at a rate of 11 percent. Asian applicants were denied at a rate of 13 percent, while Black and Hispanic applicants faced the highest conventional home purchase denial rates at 22

and 26 percent respectively.

Additionally, a closer look at conventional home purchase denial rates by race/ethnicity and income group within Clayton, shown below, demonstrates that high-income Blacks (having greater than 120% of Area Median Income) and high-income Asians were more likely to be denied for a conventional single family home purchase loan than low-income Whites (having less than 80% of Area Media Income). It should be noted that the strong majority of home purchase applications for Clayton County in 2015 (81%) were for nonconventional loans (discussed in a later section), resulting in smaller sample sizes for conventional loan applications, particularly for Hispanics. However, low-income Blacks and low-income Hispanics were the only groups with denial rates exceeding 20 percent, more than double the rate of low-income Whites. For conventional single-family home purchases, Asian applicants had the smallest disparity in denial rates between low- and high-income applicants, at 1 percent, followed by Blacks at 3 percent. White applicants had the greatest disparity in denial rates between low- and high-income applicants at 6 percent.

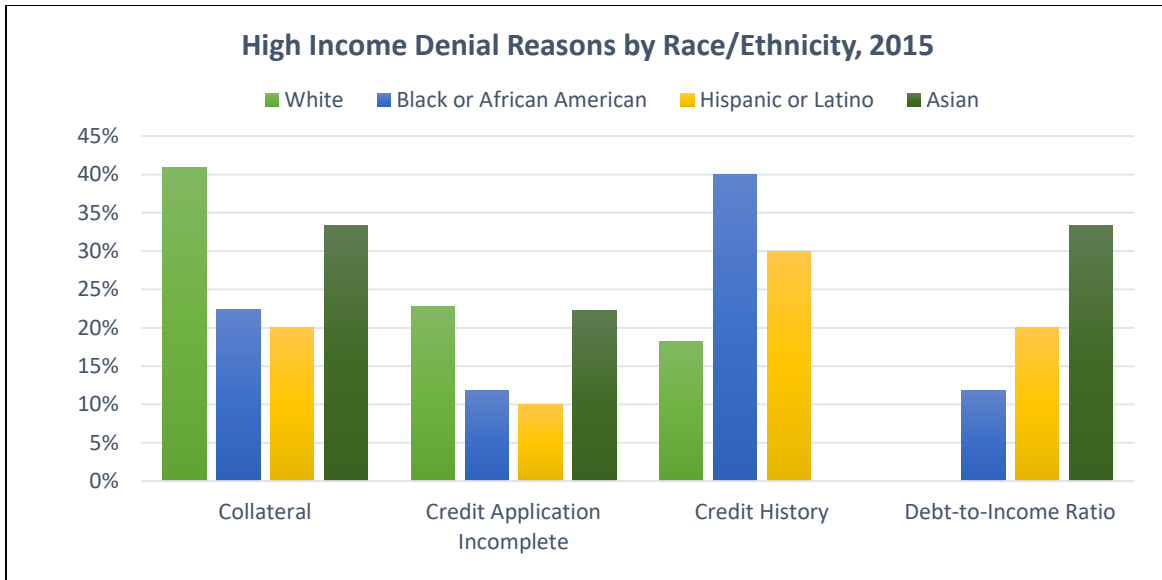


**\*Note: Insufficient data for High Income Hispanic applications**

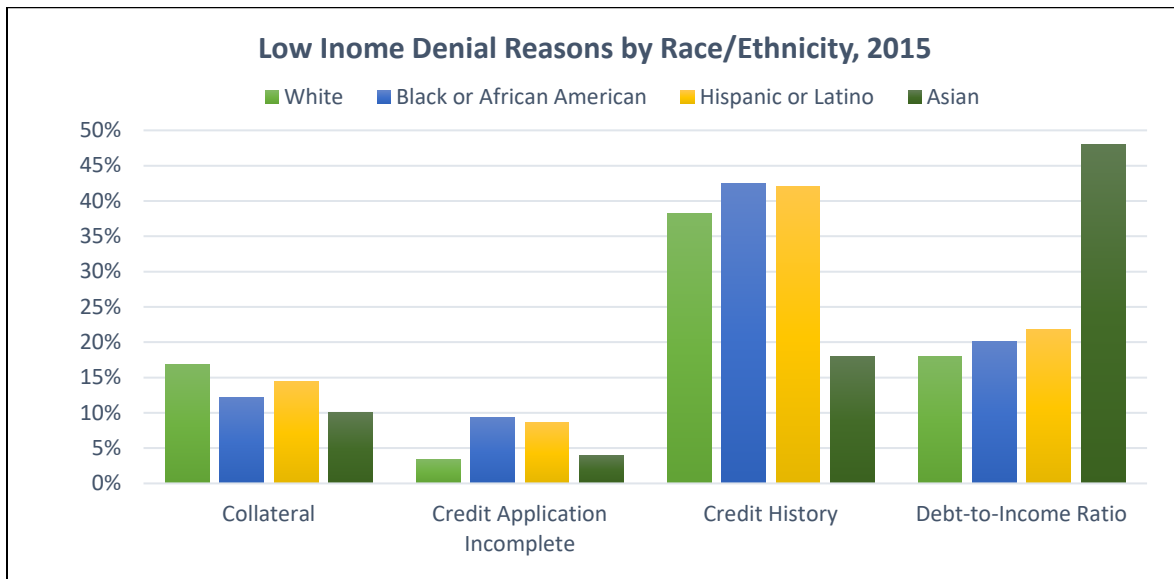
#### Application Denial Reasons by Income Group

The charts below compare denial reasons among White, Black, Hispanic, and Asian applicants by income group.

As of 2015, leading denial reasons for high-income applicants by race/ethnicity varied, as the top denial reason for Blacks and Hispanics was credit history, while Whites were most likely to be denied for lack of collateral. High-income Whites and Asians were more likely to be denied for incomplete credit applications and lack of collateral relative to other race/ethnicity groups, while high-income Blacks were disproportionately likely to be denied for credit history.



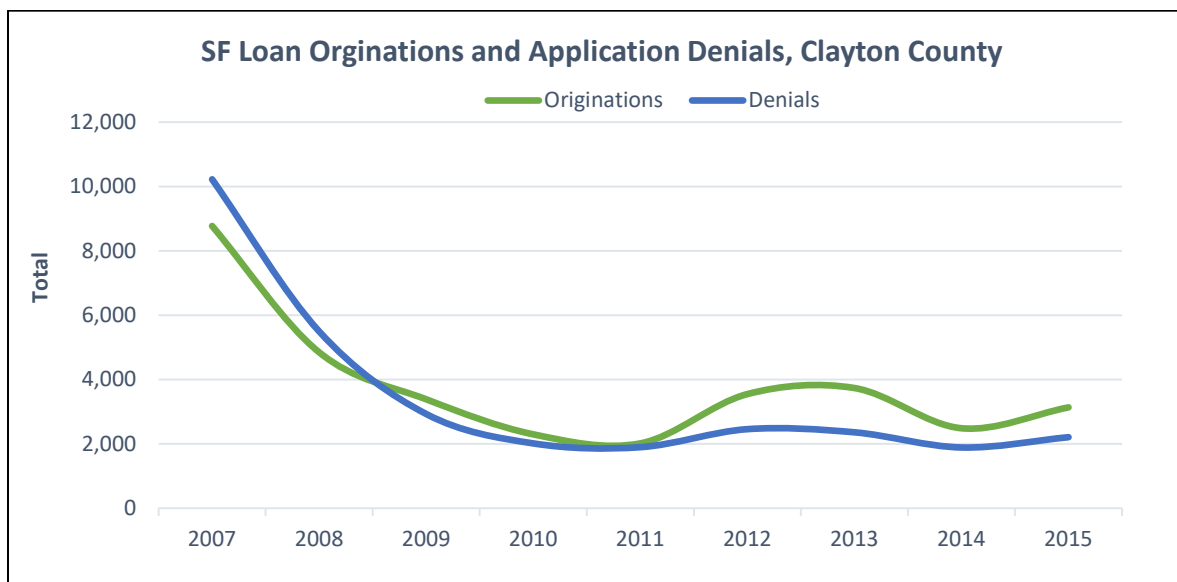
For low-income denials across all examined race/ethnicity groups, lack of collateral and incomplete credit applications represented relatively small shares in 2015, with credit history and debt-to-income ratio being the top two denial reasons for all groups. Low-income applicants of every race/ethnicity group examined were denied for debt-to-income ratio and credit history at a higher rate than their high-income counterparts, and in the case of credit history for low-income Whites, the rate was more than double. Similar to high-income Blacks, low-income Blacks were most likely to be denied for credit history relative to other groups, though by a significantly lower margin than high-income Black applicants.



### **Clayton County's Single Family Lending Market, 2007-2015**

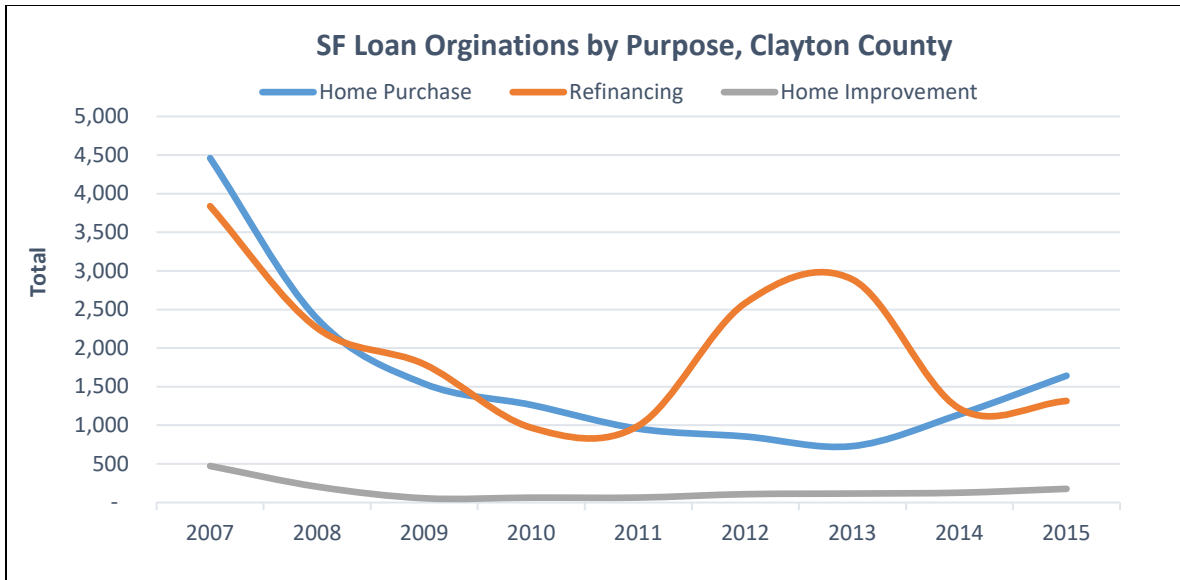
The following section examines HMDA data for Clayton County from 2007-2015.

Highlighted below, the number of single-family loan originations followed a somewhat dynamic trajectory between 2007 and 2015, trending downward between 2007 and 2011 in the wake of the economic downturn, followed by increases between 2011 and 2013. Subsequently, originations fell between 2013 and 2014, though rose between 2014 and 2015 to a level of over 3,100 within the County as of the most recent data year. Though the year-over-year growth of rate of 26 percent exceeds the nation as a whole at 22 percent, the countywide origination total as of 2015 remains nearly two-thirds below the County's 2007 levels and nearly 16 percent below its 2013 levels, with the latter year having the highest total since 2009. Compared to 2010, however, total originations within the County have increased by over 36 percent. In contrast to originations, the number of application denials within Clayton County has demonstrated a relatively steadier downward trend between 2007 and 2015, falling by nearly 80 percent, despite a mild year-over-year increase between 2014 and 2015. Leading up to the financial crisis, total denials in Clayton County exceeded total originations, though this trend was reversed for every year from 2009 onward. Relatedly, the share of denials as a percent of total originations and total denials has declined since the onset of the housing bust in 2007, from 54 percent to 41 percent.

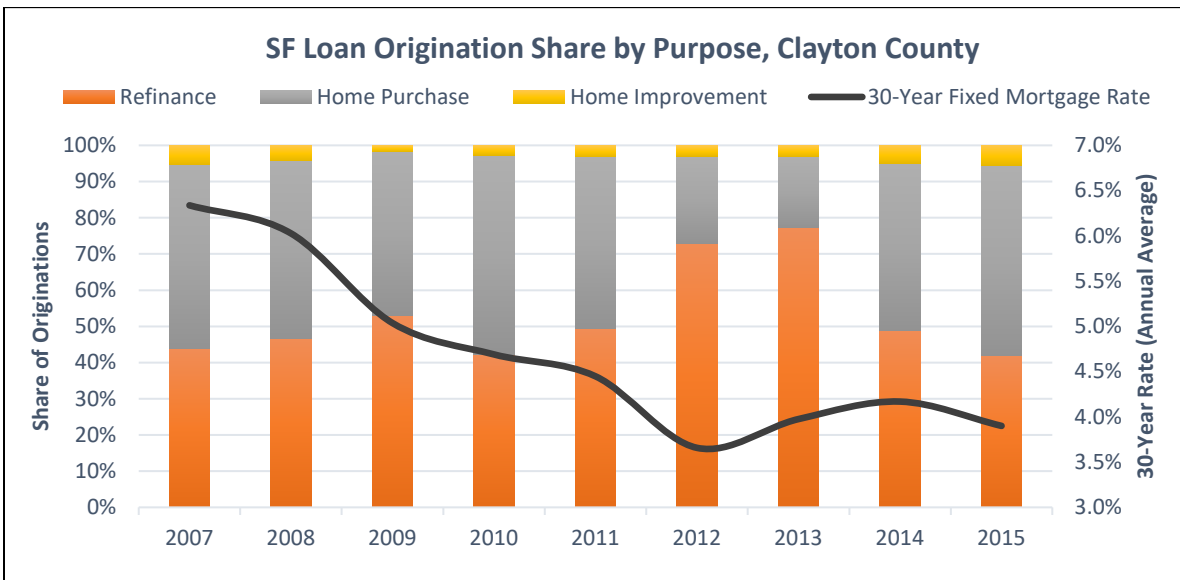


Shown below, much of the year-to-year fluctuations in total originations that occurred between 2007 and 2015, particularly from 2011 onward, were the result of the dynamism of refinancing originations. Though home purchases and refinances were at comparable levels between 2007 and 2011, refinancing became the dominant loan purpose by a large margin in 2012 and 2013. As of 2015, however, home purchases are again the leading loan purpose within Clayton County, comprising a slim majority of 52 percent of the County's total. While refinance loans have continued to fluctuate, home purchase originations have been on a consistent upward trajectory since 2013. Further, 2015 was the first year in which the level of home purchase originations in Clayton County exceeded 1,600, the County's highest total since 2008.



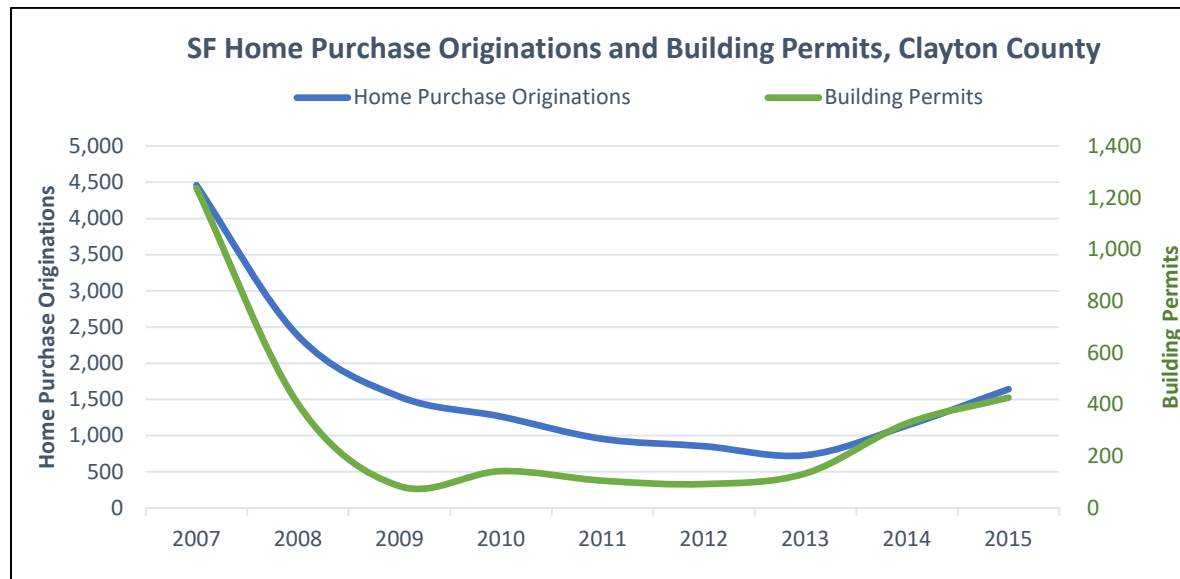


The level of refinance originations appears to move generally with the 30-year fixed rate mortgage average, shown below. Between 2011 and 2012, for example, when the average 30-year fixed rate mortgage declined to its lowest level of all the years examined, refinance originations in Clayton County increased dramatically in both absolute and percentage terms, from under half of all originations to nearly three-quarters. As interest rates rose between 2013 and 2014, the number of refinance originations correspondingly declined. However, the decrease in the annual average of the 30-year fixed mortgage rate between 2014 and 2015 did not subsequently lead to year-over-year growth in the share and absolute number of refinance loans over the same time period in Clayton County.



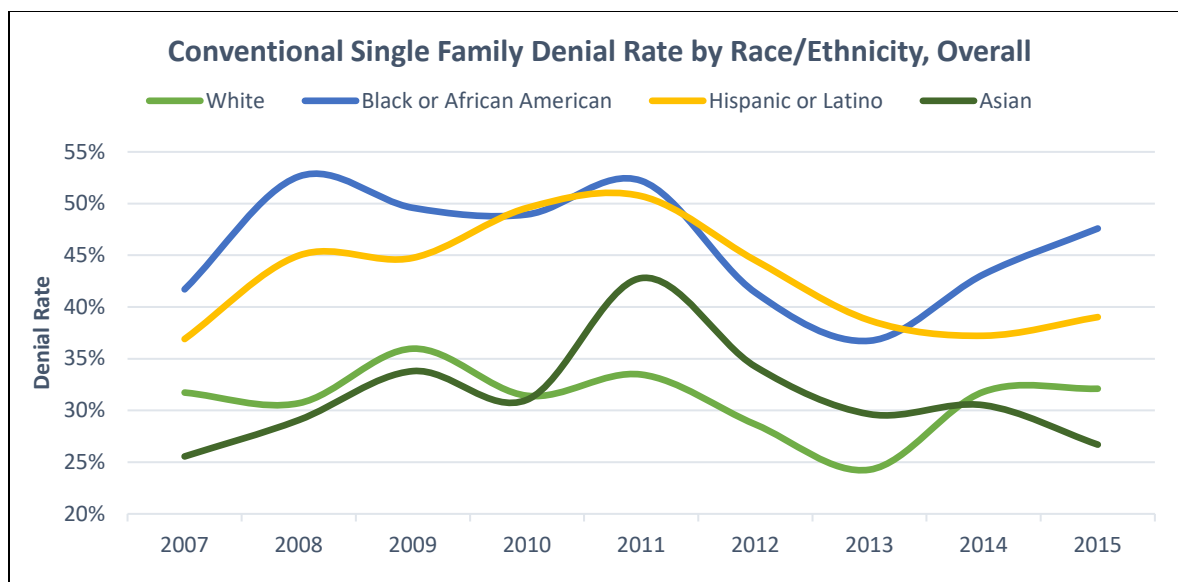
Source: HMDA, Federal Reserve Bank of St. Louis

For home purchase loans, the movement of originations appears to track trends in the number of single family building permits issued within Clayton County. The rise in building permits since 2013 is consistent with growth in home purchase originations, indicating recent and steady growth in housing demand within the County.

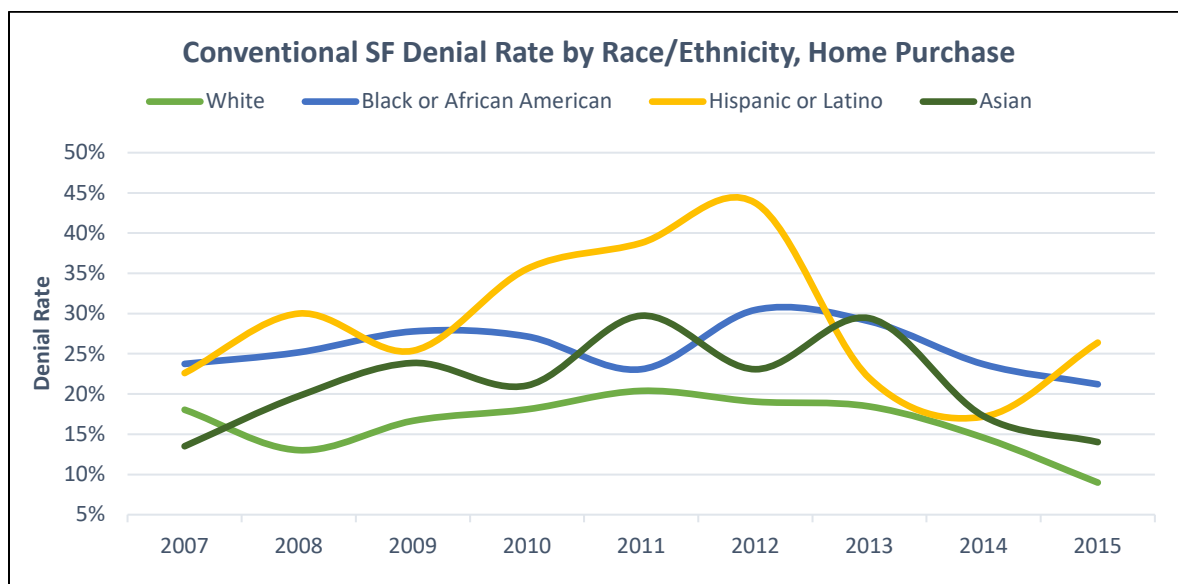


### Income, Race, and Single Family Loan Denials in Clayton County

Denial rates for conventional single-family loans in Clayton County over time vary by race and ethnicity. The chart below shows that between 2007 and 2015, the disparity between various racial and ethnic groups in loan denial rates fluctuated, though for every year examined White and Asian applicants were less likely to be denied for a conventional home loan than Black and Hispanic applicants. Though the denial rate fell for all groups between 2011 and 2013, Black applicants are the only racial group that has experienced a steady denial rate increase in every year since. Asian applicants had the lowest denial rate between 2007 and 2010, as well as in 2014 and 2015. All race/ethnicity groups had higher conventional denial rates in 2015 relative to 2007.

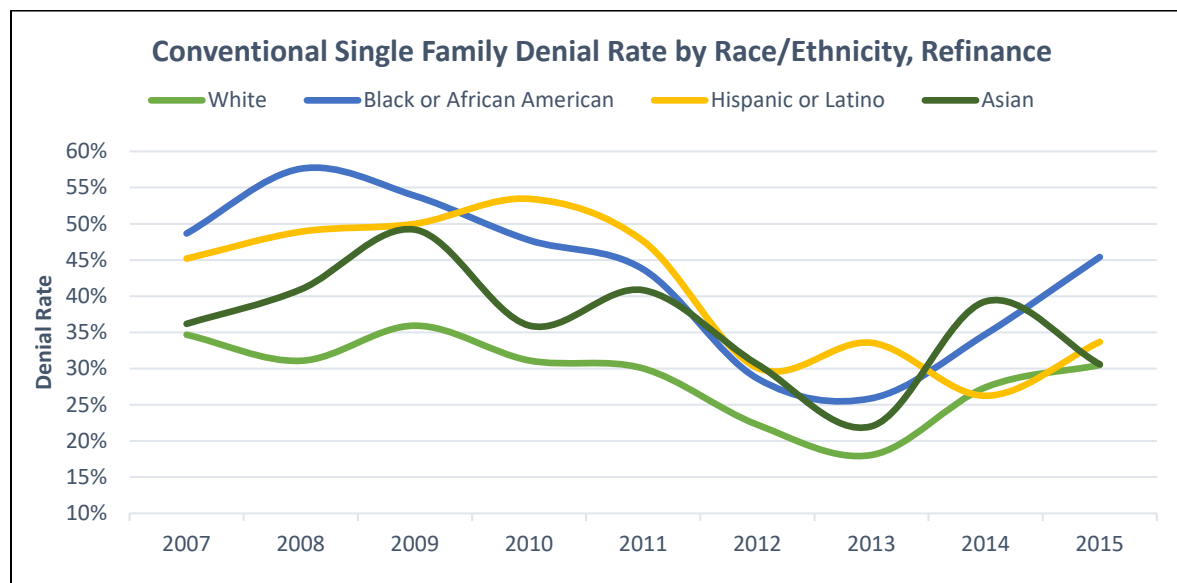


Conventional home purchase denial rates exhibit more variability among race/ethnicity groups relative to overall denial rates, though White applicants were the least likely to be denied in every year after 2007. Between 2009 and 2012, the home purchase denial rate for Hispanics diverged from the other groups, increasing to 44 percent, more than double the White denial rate of 19 percent. Since 2012, Black and White applicants have experienced a steady decrease in conventional home purchase denial rates. As of the most recent data year, all race/ethnicity groups have lower home purchase denial rates relative to 2010.



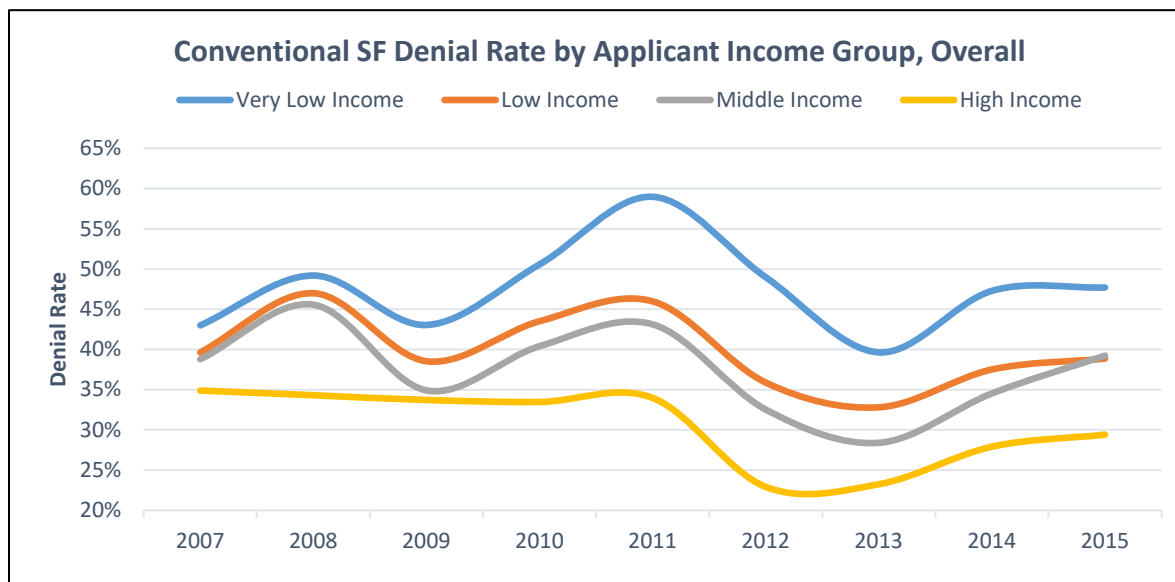
For conventional refinance applications, Whites were the group with the lowest denial rate for every year between 2007 and 2015, with the exception of 2014, though converged to near the Asian denial rate in 2007 and 2015. All groups experienced a decrease in their refinance denial rates during the same time period, with Hispanic applicants falling by over 11 percentage points. Though Black applicants saw

significant reductions in the conventional refinance denial rate between 2008 and 2013, between 2013 and 2015 the Black denial rate more than doubled, increasing from 22 percent to 45 percent.

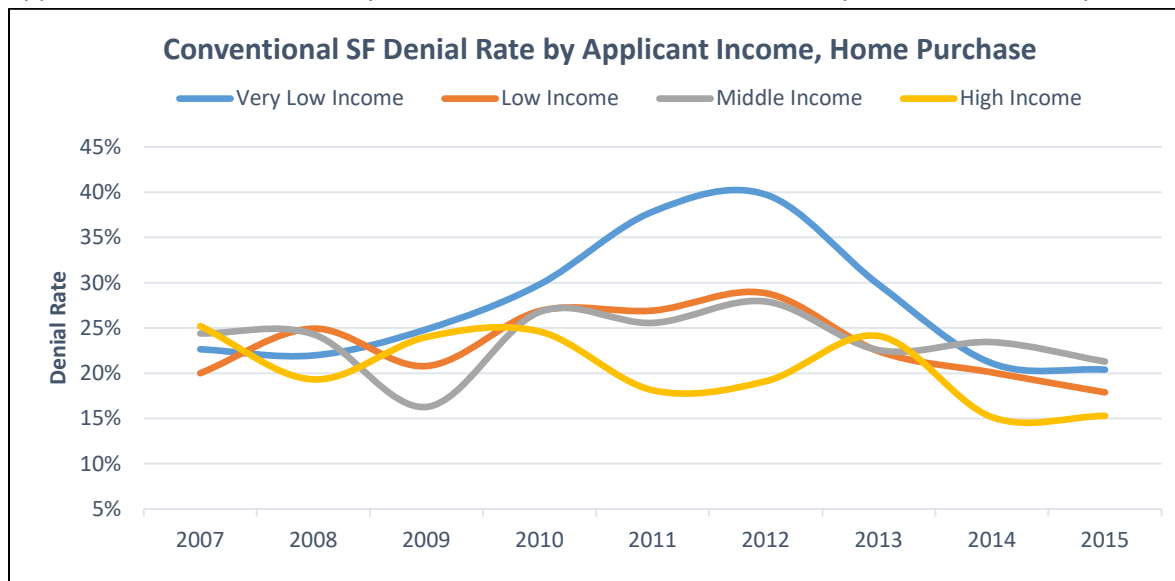


A view of conventional single family denial rates by applicant income group within Clayton County, highlighted below, shows the expected outcome of higher income groups generally experiencing lower denial rates than lower income groups. Relatedly, the denial rate for very low-income applicants (50% or less of AMI) has remained above other income groups during the years examined, with the majority of their applications being denied in 2010 and 2011, and 48 percent of applications being denied in 2015. High-income (greater than 120% of AMI) and middle-income (80 to 120% of AMI) applicants consistently the lowest and second lowest denial rates, with the exception of 2015, when middle-income and low-income applicants had the same denial rate of 39 percent. The conventional single-family denial rate for all income groups was lower in 2015 relative to 2010, though has increased steadily across all groups since

2013.

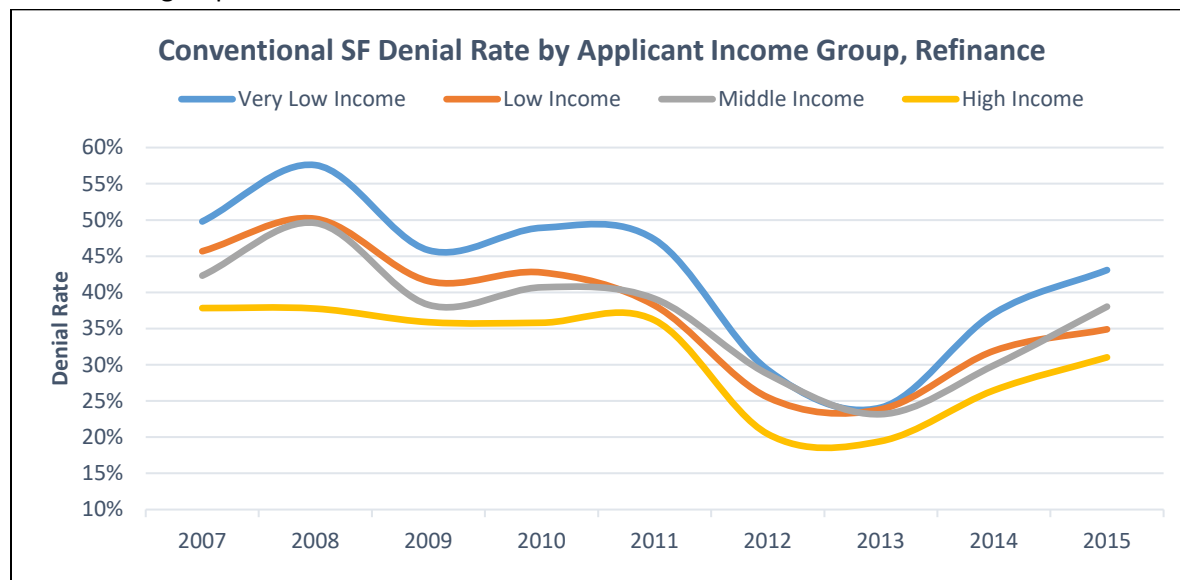


In contrast to overall conventional denial rates by income group, home purchase applications are much less consistent in denial rates by income group during the years examined. With the exception of the years between 2010 and 2013, when the denial rate for very low-income applicants increased dramatically while the high-income denial rate dropped, conventional home purchase denial rates remained relatively close together and fluctuated year-over-year between income groups. During 2014 and 2015, middle-income applicants were the most likely to be denied for a conventional home purchase loan in Clayton County.

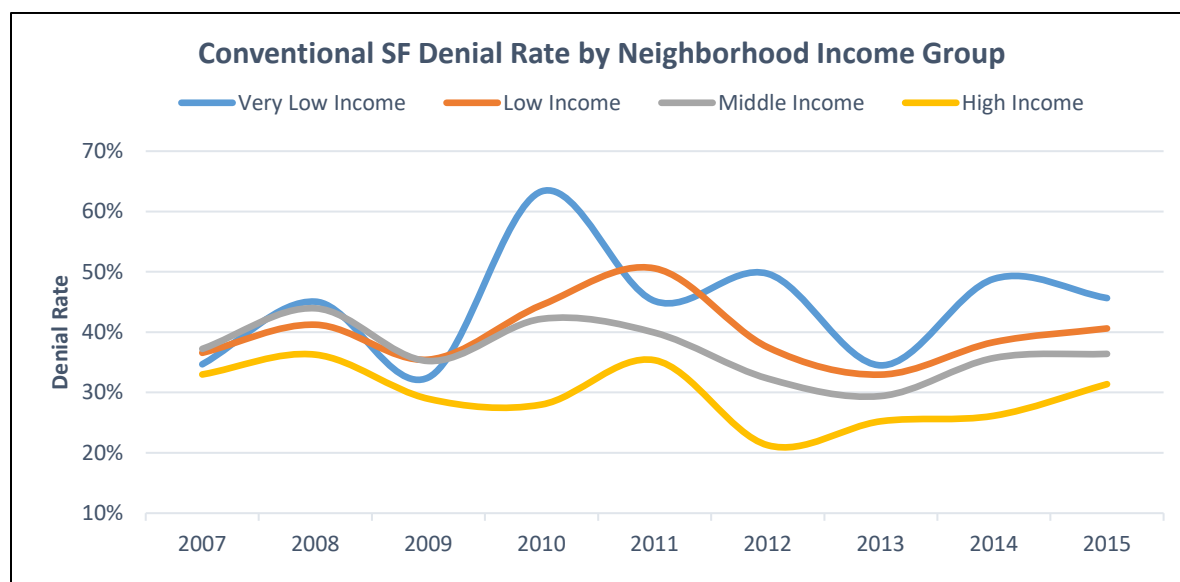


Denial rates for conventional refinance applications by income group have followed a relatively more synchronized trend compared to home purchase applications. High-income applicants were the least likely to be denied in every year analyzed and very low-income applicants were the most likely. Between

2013 and 2015, the denial rate for all income groups increased though remains below both 2007 and 2010 levels for all groups.



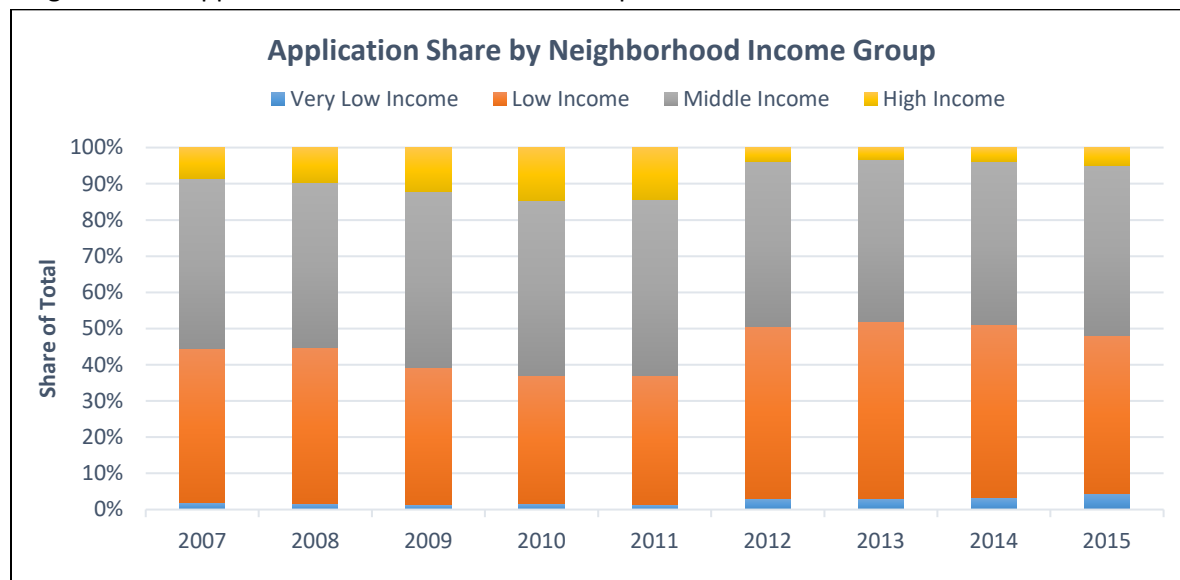
In addition to the income of the applicant, the median income of the application property's neighborhood (defined as Census Tract) also reveals the high-income group outperforming other groups with regards to the denial rate. Though the very low-income neighborhood denial rate was as high as 63 percent in 2010, it has since fallen to 46 percent. The denial rate for all neighborhood income groups, with the exception of very low-income neighborhoods, increased between 2014 and 2015.



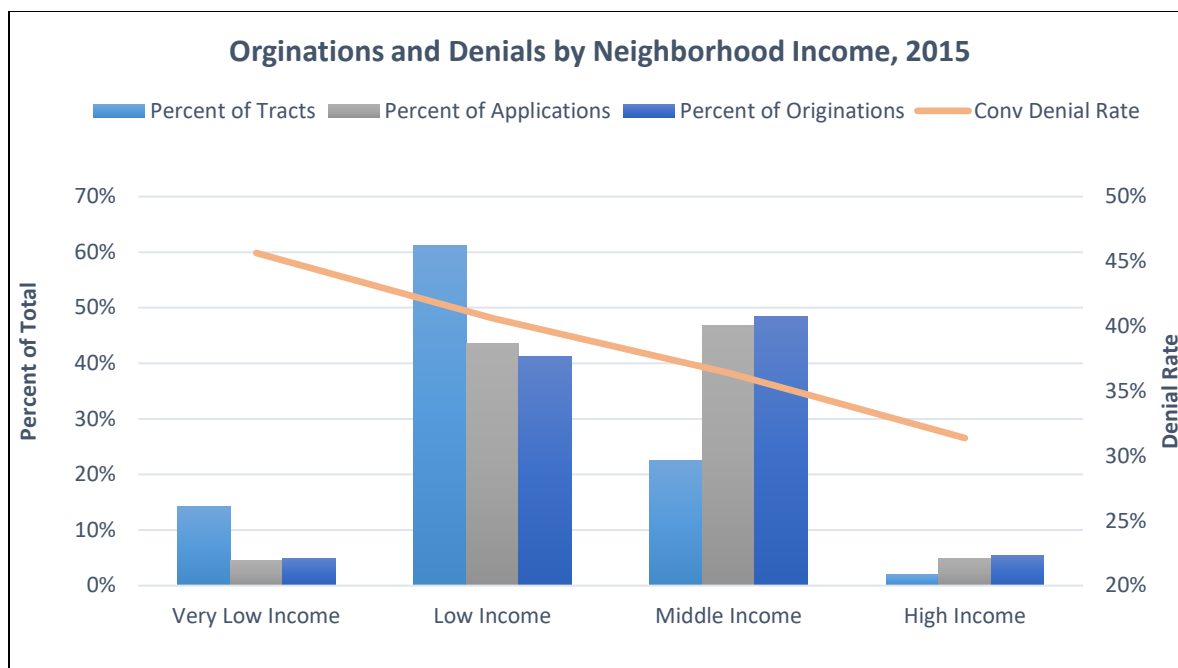
As a percentage of total single-family loans applications within Clayton County, middle-income neighborhoods represented the largest share every year between 2007 and 2011, though between 2012 and 2014, low-income neighborhoods had the highest share of loan applications. Since 2010, the share of



high-income neighborhood applications has fallen from 15 to 5 percent while the share of low-income neighborhood applications has risen from 36 to 44 percent.

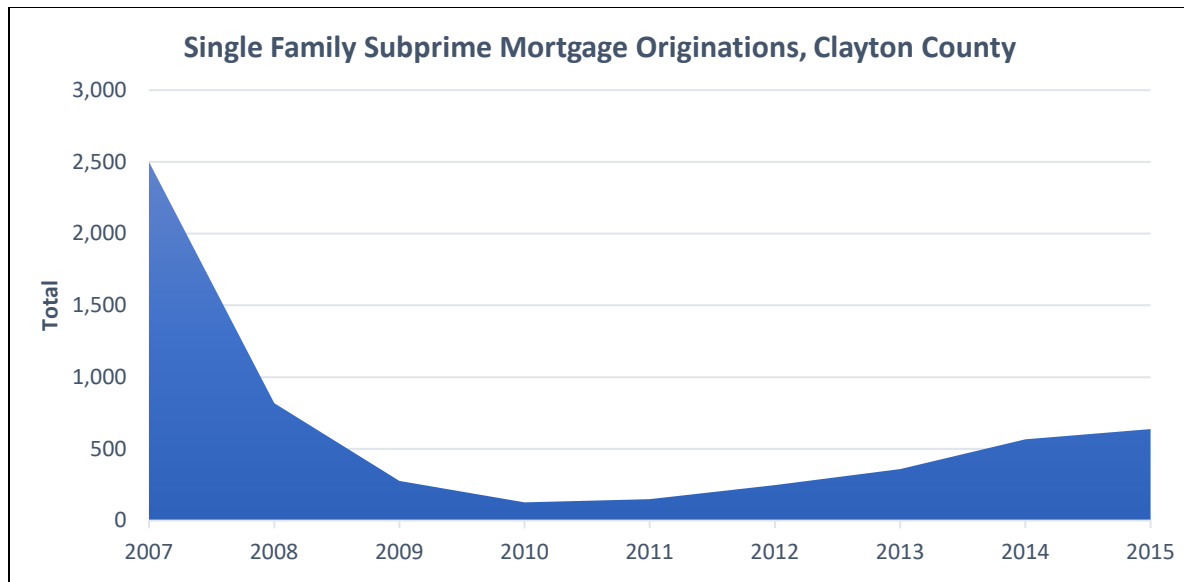


Within Clayton County, very low-income and low-income neighborhoods represent 76 percent of the County's total neighborhoods, although they are represented by approximately 46 percent of total originations and 48 percent of total applications as of 2015, shown below. This suggests that very low- and low-income neighborhoods within Clayton County are less likely to participate in the single-family lending market. By contrast, loan applications and originations within the County are disproportionately likely to occur for properties in high- and middle-income neighborhoods. For example, high-income neighborhoods represent 2 percent of the County total, though they account for 5 percent of applications and all single-family loan originations throughout the County in 2015.

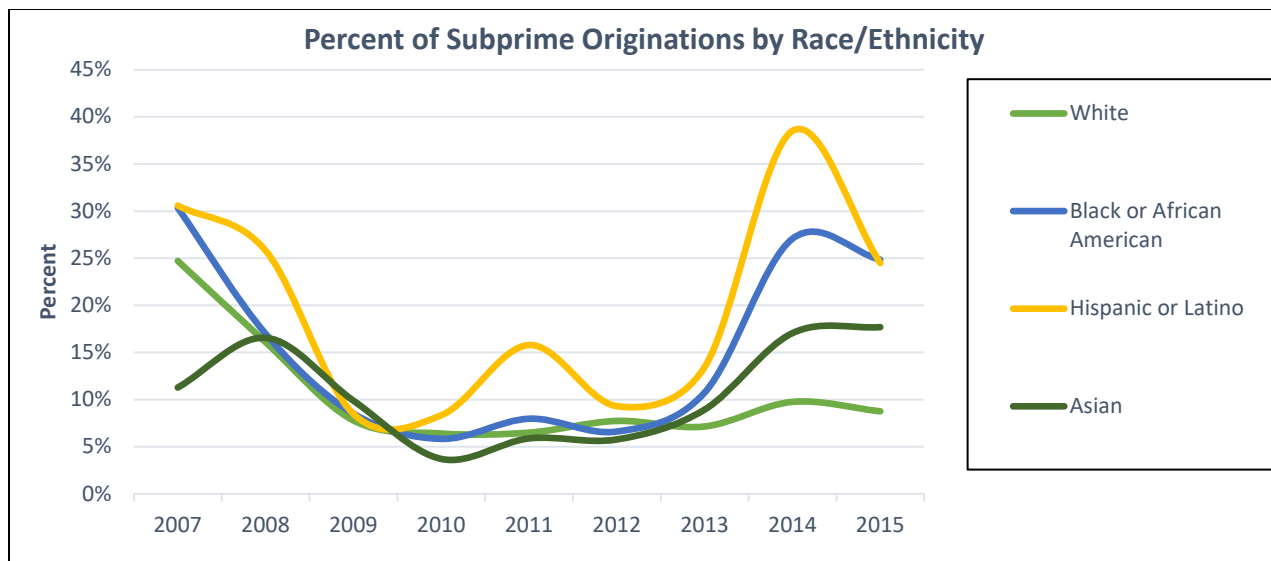


### The Subprime Market

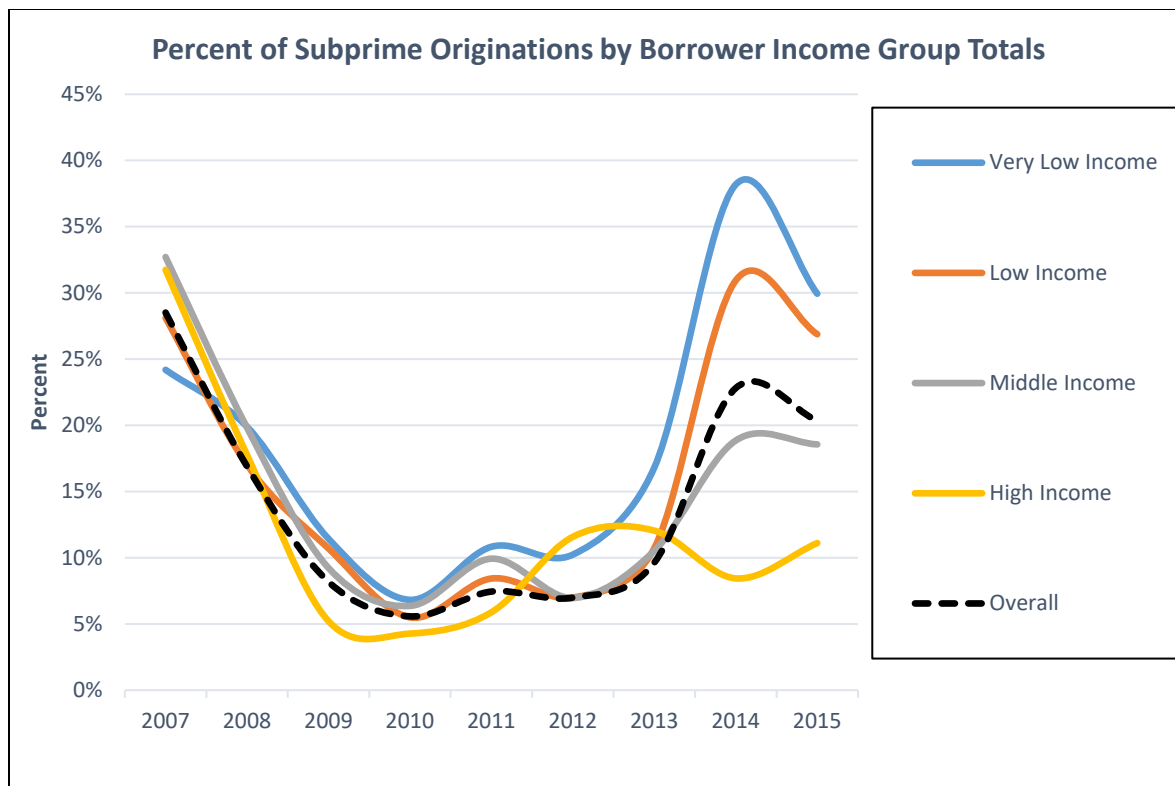
Illustrated below, the subprime mortgage market in Clayton County declined significantly between 2007 and 2010, falling by nearly 95 percent, though has increased in every year since. Subprime loans are defined as those with an annual percentage rate that exceeds the average prime offer rate by at least 1.5 percent. The total number of subprime loan originations in Clayton County fell by over 75 percent between 2007 and 2015, exceeding the prime origination decrease of 60 percent during the same time period. However, since 2010, the number of subprime loan originations has grown by nearly 400 percent (prime originations grew by 15 percent), though this still remains approximately a quarter of the County's 2007 levels. Relatedly, subprime originations as a percent of Clayton County's total declined from 29 percent to 6 percent between 2007 and 2010, but have risen to approximately 20 percent as of 2015, down from 23 percent in 2014.



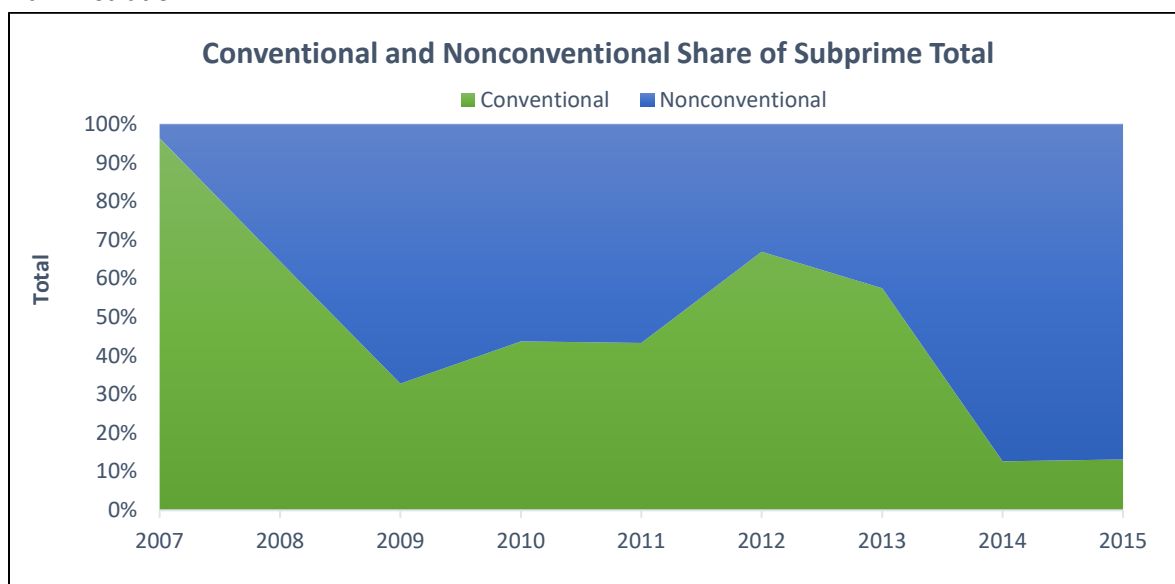
Looking at the share of subprime loans as a percentage of total originations by race/ethnicity, Black and Hispanic loan recipients were more likely to be subprime than White loan recipients in 2007. The period between 2007 and 2009, consistent with the onset of the housing crisis, saw the subprime share for all racial and ethnic groups decline substantially, with all groups converging to a subprime share of less than 10 percent in 2009. Leading up to 2015, however, the share of subprime mortgages among Blacks and Hispanics in Clayton County increased considerably, although the subprime share for all groups except Asians declined between 2014 and 2015. For Black, and to a lesser extent Asian originations, the subprime share trend between 2007 and 2015 resembles a U-shape, while Hispanic originations resemble a W-shape. Hispanics are the only race/ethnicity group that have surpassed the 2007 share in the years since, doing so in 2014, when nearly 40 percent of Hispanic originations were subprime. As of the most recent data year, the subprime share for Blacks and Hispanics was around a quarter of all originations, nearly 3 times higher than Whites at just under 9 percent, with Asians at nearly 18 percent. Relative to the pre-crisis share of subprime loans, Whites are at slightly over a third of the 2007 share, Blacks and Hispanics are approximately 80 percent, and Asians are over 1.5 times the 2007 share as of 2015.



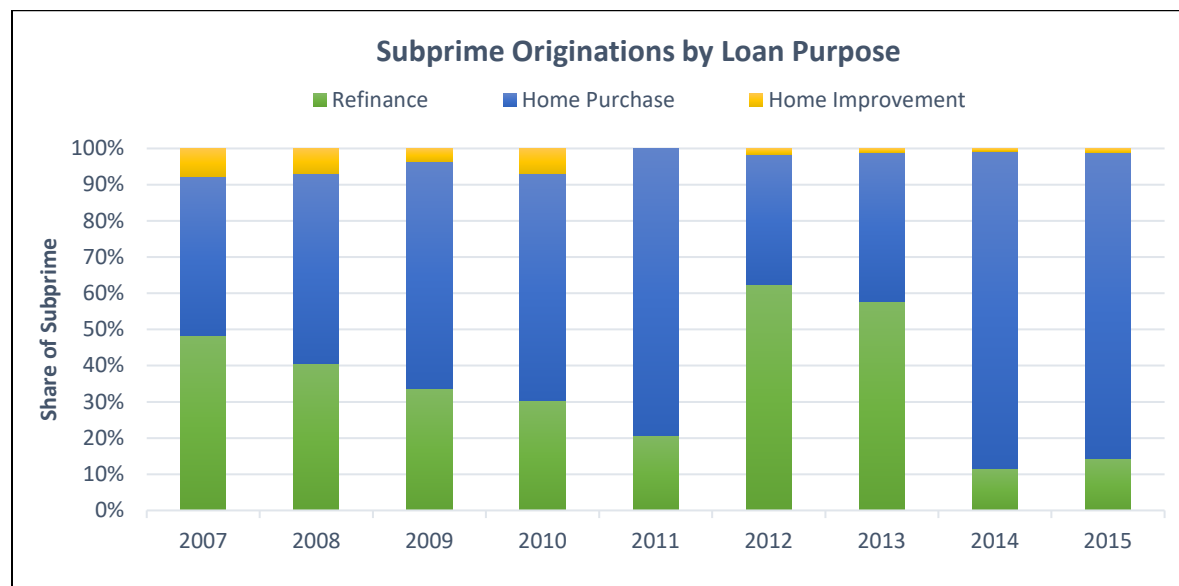
A view of subprime originations by income group shows a sharp decline between 2007 and 2010 among all groups, with broad increases from 2013 to 2014 for every group except high-income borrowers. Between 2014 and 2015, however, subprime shares for all income groups, excluding high-income borrowers, decreased, with changes most pronounced in the low- and very low-income borrower groups. Since 2013, the gap in subprime shares between income groups increased strongly, in contrast to the relatively similar shares in subprime originations between 2007 and 2009. For example, the ratio of the low-income subprime share to the high-income subprime share in 2007 was 0.9, indicating that low-income originations were slightly less likely to be subprime relative to high-income loans. However, as of 2015, the same ratio is nearly 2.5, suggesting that low-income originations are much more likely to be subprime when compared to high-income originations. The 2015 subprime share for high-income originations was slightly over a third of the 2007 share, while the County's overall subprime share in 2015 is about 70 percent of the subprime share in 2007.



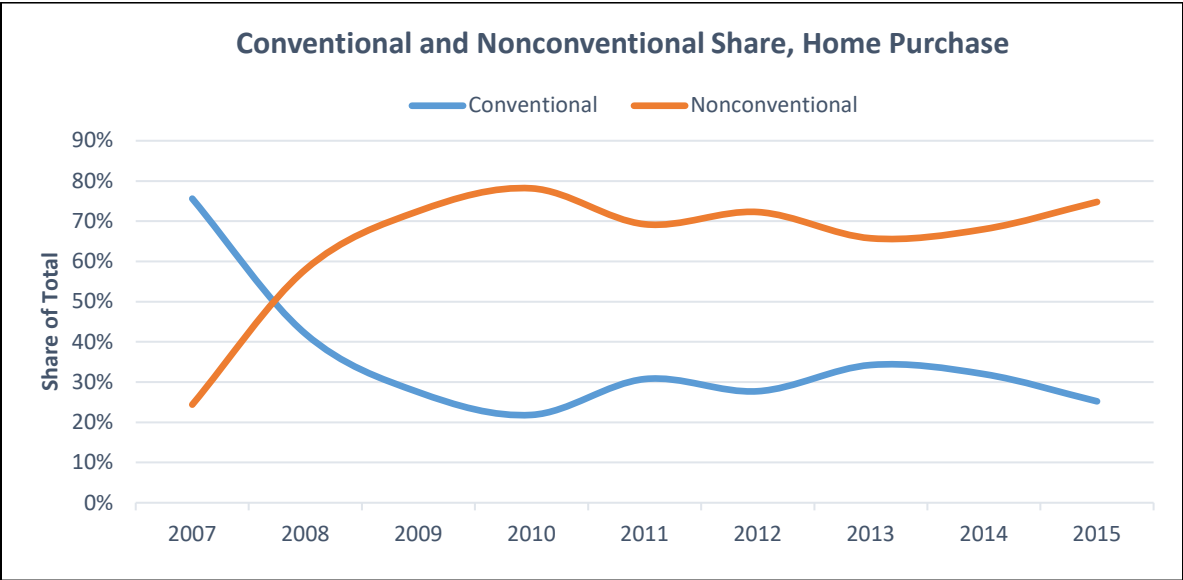
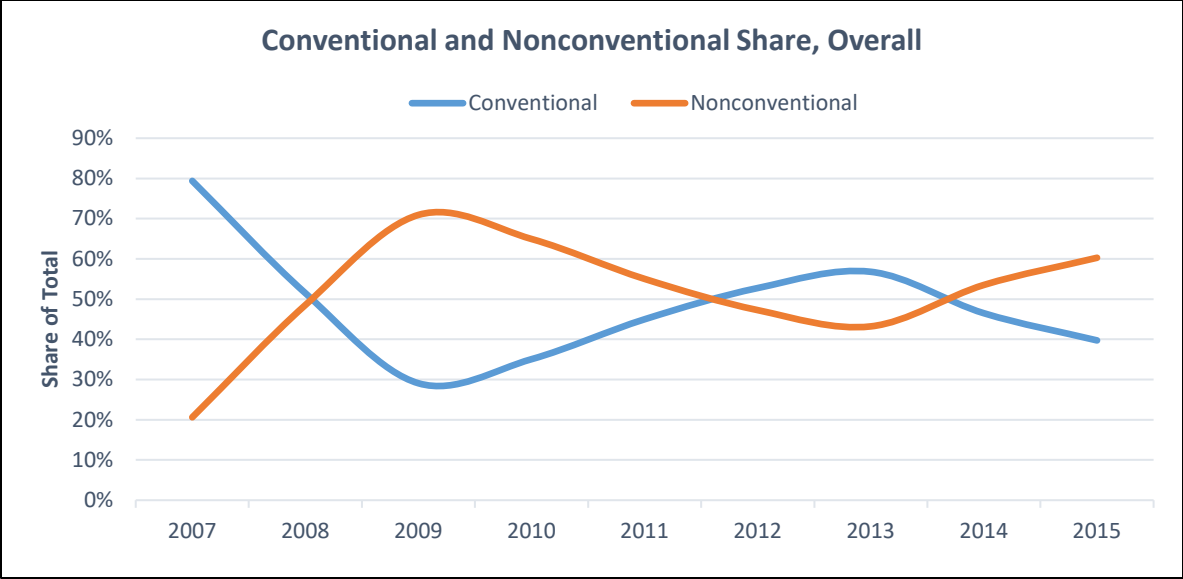
Consistent with broader national trends, the composition of subprime loans within Clayton County has largely shifted from conventional loans to government-insured nonconventional loans in the aftermath of the housing crisis. In 2007, over 96 percent of subprime loans within the County were originated by conventional lenders. As of 2015, that percentage has dropped to 13 percent, remaining constant year-over-year from an otherwise steady downward trend since 2012. Of the nonconventional subprime loans originated in Clayton County, nearly all (over 99% in 2015) were insured by the Federal Housing Administration.



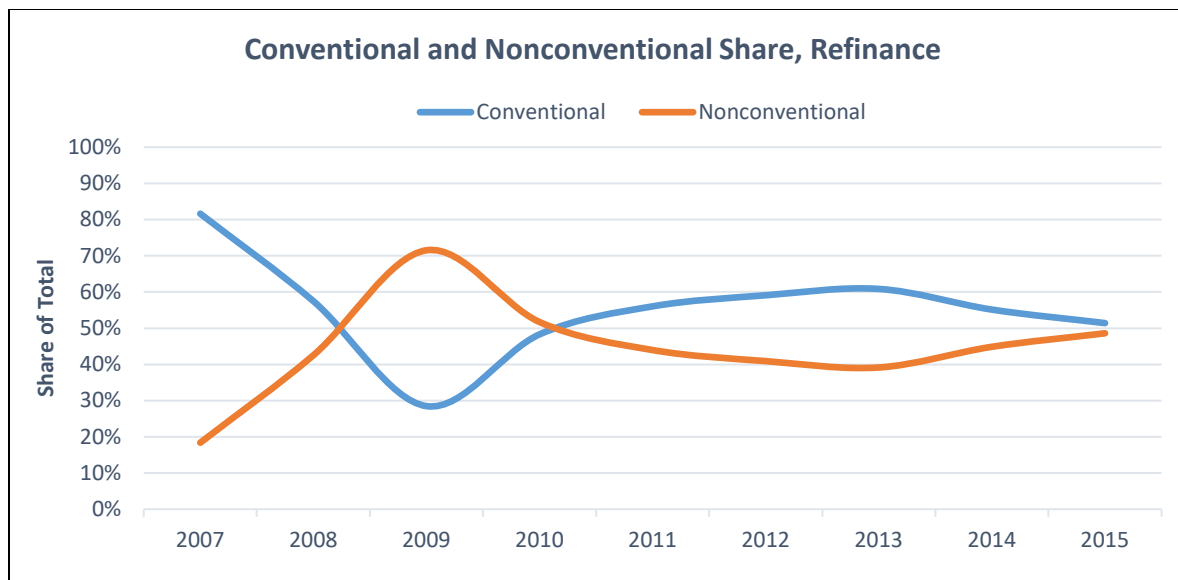
As a percentage of all subprime loan originations within Clayton County, home purchases represented approximately 85 percent in 2015, up from 44 percent in 2007 and a low of 36 percent in 2012, though down from a peak of nearly 88 percent in 2014. Relatedly, refinance originations as a share of the subprime total has declined substantially from its peak of 63 percent in 2012 to under 15 percent as of 2015.



Though subprime loans within Clayton County are mostly nonconventional, at 87 percent, the nonconventional share of the County's total single-family originations in 2015 was a lower 60 percent of total originations. This was driven to a greater extent by home purchase originations, at 75 percent nonconventional, rather than refinance originations, the majority of which were originated by conventional lenders, shown below. In 2012 and 2013, the majority of overall originations in Clayton County were conventional, though this trend was reversed in 2014 and 2015. In every year since the onset of the housing bust, home purchase originations have been more likely to be nonconventional, peaking in 2010 at 78 percent, and increasing from two thirds in 2013 to three-quarters in 2015.







## Conclusion

Clayton County exhibited moderate mortgage market fundamentals as of 2015, including a year-over-year origination growth rate that is greater than the United States as a whole. The share of denials has declined since 2007, and home purchase originations have steadily increased since 2013, suggesting signs of a housing market recovery despite total originations remaining below pre-crisis levels as of 2015.

The composition of mortgage originations in Clayton County has shifted toward nonconventional lending in recent years, particularly in the case of home purchases. Insured primarily through the Federal Housing Administration, these loans have lower down payment and credit requirements, and their growth is consistent with tighter credit conditions and a more active regulatory environment in the wake of the housing crash.

The County has been subject to cyclical trends that reflect broader economic conditions in recent years, including changes in mortgage rates that tend to influence the prevalence of refinance originations. Additionally, the subprime market remains well below its peak prior to the housing bust despite growth since the turn of the decade.

Some trends, however, have continued despite business cycle fluctuations, such as overall higher denial rates for Black and Hispanic applicants, as well as for lower-income applicants and neighborhoods.

**b. The program participant may also describe other information relevant to its assessment of disproportionate housing needs. For PHAs, such information may include a PHS's overriding housing needs analysis.**

The following housing needs have been identified across the County and impact publicly supported housing as well as privately owned and managed housing units.

- Per the 2013 Consolidated Plan, the most significant housing problem in the County is the extreme housing cost burden facing low- and moderate-income households. Due to the tenuous financial issues these households face, they live on the verge of homelessness. Additionally, loss of employment, evictions, mental illness, and poor financial management contribute to the number of households who are homeless or on the verge of homelessness. Approximately 25 percent of the homeless population is considered chronically homeless.
- Several systemic barriers to affordable housing were identified in the 2013 Consolidated Plan, some of which are out of the control of the County. The 2010 Dodd-Frank Wall Street Reform and Consumer Protection Act was an effort to prevent a wave of foreclosures by providing a class of mortgages called QRM's that are considered safe investments. Unfortunately, loans in that category require a 20 percent down payment, which is significantly more than the 3.5 percent previously required by the FHA. This creates a barrier to low- and moderate-income households that wish to purchase a home. Appraisal companies have also begun erring on the side of lower appraisal values that do not take into account added value through rehabilitation.
- The County needs to diversify its housing stock by promoting a variety of housing types and high-density developments. This would require HUD program funds used for rehabilitation to be directed at housing types and neighborhoods that are not primarily single family detached homes.
- Across all income levels below 80 percent AMI, African-Americans households in the County experience significant disproportionate housing needs.

Within Clayton County, there are two active housing authorities: the Housing Authority of Clayton County (HACC) and the Jonesboro Housing Authority (JHA). HACC's mission is to "provide decent, safe and sanitary housing for low to moderate income residents of Clayton County. Inherent in this mission is the Authority's vision 'to make a difference in the community, one family at a time.'" HACC accomplishes its mission through five programs.

1. Developer Program – HACC assists local developers "who wish to build, maintain, or revitalize affordable housing in Clayton County." They assist in financing the purchase and improvement of properties, which brings higher quality affordable housing to the county. Overall, over 15 projects have been built using this program since 1982.
2. Homeowner Program – The Housing Urgency Grant Program provides support to families when they go through tough financial times and have a home that is in desperate need of repair. Grants are available for up to \$7,000 per house and can be used to repair natural gas systems, plumbing, electrical, and structural damage.
3. Partner Program – HACC works with other agencies that provide affordable housing options to the county's residents. Currently, HACC partners with 14 agencies including the National Association of Housing and Redevelopment, Hearts to Nourish Hope, and Habitat for Humanity.
4. Student Housing Initiative Program (SHIP) – The SHIP program works to address the pervasive homelessness problem among students in the county. Currently, there are more than 2,400

homeless students in the school system. Participants in this program will receive rental assistance, utilities assistance, and reserve funds to assist them.

5. Contractor Certification – HACC runs a contractor certification program to improve the quality of life of its residents by improving housing conditions, reducing the influences that contribute to blight, and to raise awareness among residents of the need for home preservation. The program provides financial assistance to property owners who need to make necessary improvements to their homes.

The Jonesboro Housing Authority’s mission is to “assist eligible low income families with safe, decent and affordable housing as they strive to achieve self-sufficiency and improve the quality of their lives.” JHA runs the Section 8 and Housing Choice Voucher program, as well as the Public Housing program in Clayton County.

### 3. Contributing Factors of Disproportionate Housing Needs

*Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disproportionate housing needs.*

- Availability of affordable units in a range of sizes
- Displacement of residents due to economic pressures
- Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking
- Lack of access to opportunity due to high housing costs
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Land use and zoning laws
- Lending discrimination
- Loss of Affordable Housing
- Source of income discrimination
- Other

In order for a community to see economic growth and development it is necessary to have diverse housing options. **The availability of affordable units in a range of sizes** is a factor that can create, contribute to, perpetuate, or increase the severity of disproportionate housing needs in Clayton County. The following table shows the availability of housing types within Clayton County, the Atlanta region, and Georgia as a whole. In particular, housing in the “missing middle” is particularly important in providing affordable housing options for residents. The “Missing Middle” is comprised of housing units that are neither large multi-family complexes nor 1-unit detached units. Many communities are missing this middle form of housing that many families desire. Within Clayton County 20.6 percent of the housing falls in the “missing middle”. Atlanta and the state have less housing within this key group.

TABLE: Housing Type Availability								
	1-unit, detached	1-unit, attached	2 units	3 or 4 units	5 to 9 units	10 to 19 units	20 or more units	% “Missing Middle” Housing

Clayton County	64.3%	4.7%	1.3%	3.5%	11.1%	7.5%	4.7%		20.6%
Atlanta-Sandy Springs - Roswell	67.0%	5.1%	1.4%	2.6%	5.8%	6.6%	8.3%		14.9%
Georgia	66.3%	3.7%	2.2%	3.0%	5.1%	4.7%	5.6%		14.0%
Source: American Community Survey 5-Year Estimates 2011-2015, DP04 Note: Total housing for each location does not equal 100% because two categories (Mobile Home and Boat, RV, van) have been removed from the table									

Rising housing costs can lead to ***displacement of residents due to economic pressures***, which adds to disproportionate housing needs. As the costs of housing rises, low-income residents, particularly renters who do not see rising housing costs as an increase in the value of their investment, can be pushed out of their homes.

***Lending discrimination*** based on race or ethnicity is illegal, but it still happens and can contribute to disproportionate housing needs if families are prevented from accessing resources that would assist them in home-ownership. Within Clayton County, Black and Hispanic applicants have higher rates of loan denial than White applicants despite similar incomes. Black applicants are more likely to be denied due to credit history, while Hispanic applicants are more likely than other races to be denied due to lack of collateral. White applicants in the low-income range were denied 11 percent of the time, while Black applicants were denied 22 percent and Hispanic applicants 23 percent of the time. High income Black applicants were denied 18 percent of the time and White applicants were denied 5 percent of the time. There was not enough information on high-income Hispanic applicants.

During the 2017 interviews with leaders in the community, Clayton County was informed that there had been a reduction in the number of units that accept housing vouchers. If fewer landlords take vouchers then this could be a factor that significantly increases the severity of disproportionate housing needs in the community. Residents also often lack knowledge about their rights under the Fair Housing Act.

***Loss of affordable housing*** in the region may be contributing to disproportionate housing needs. Interviews with community members revealed the perception that institutional investors purchased much of the affordable housing in the county after the mortgage crises and it is no longer available for LMI residents. An institutional investor is any entity that purchases at least 10 properties in one year. Per ATTOM Data Solutions, a leading source of housing data in the United States, institutional investors purchased 11.9 percent of the single-family homes in Clayton County were in the third quarter of 2016. This adds to the perceived tension in the community between owners who would like to see housing prices increase and renters who desire lower rates.

As mentioned earlier, members of the community perceive a there is a perception that there is a ***lack of private investment in specific neighborhoods***. This lack of investment may be contributing to disproportionate housing needs in the County. Economic opportunities limited to certain neighborhoods can prevent low-income individuals from accessing affordable housing or maintaining stable home ownership.

According to Interviews with community leaders, ***displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking*** is an important issue in the community. There are not enough resources available to help victims and they often must stay with friends and family, face homelessness, or stay in an unsafe situation.

## C. Publicly Supported Housing Analysis

### Analysis

#### Publicly Supported Housing Demographics

**i. Are certain racial/ethnic groups more likely to be residing in one program category of publicly supported housing than other program categories (public housing, project-based Section 8, Other Multifamily Assisted developments, and Housing Choice Voucher (HCV)) in the jurisdiction?**

Yes. Black households are more likely to reside in all publicly supported housing in the County, especially in the HCV program.

Blacks make up 67.7 percent of households in Clayton County. Approximately 66.9 percent of households in the County that have extremely low incomes (0-30% AMI) are Black. Also 64.7 percent of households that are very low income (0-50% AMI) are Black. Due to this, the race group experiences a majority of residents in publicly supported housing.

However, while the majority of residents in publicly supported housing are Black, the race group is over represented in all public housing categories as compared to the percentage of Black households in the County. Black households are more concentrated in public housing (80%), Project Based Section 8 (83.8%), Other Multifamily (84.8%) and almost all HCV Program (97.4%) participants than in households the general population (67.7%). On the other hand, Hispanics accounted for 9.3 percent of households and Asians accounted for almost 4 percent of the households in the County, yet they had little or no representation in public housing programs.

Data note: The percentage of Black persons in the total population in Clayton County is 64.9 percent, while the percentage of Black households among all households in the County is 67.7 percent. The percent of persons who identified as Hispanic in the County was 13.7 percent, while the percent of Hispanic households was 9.3 percent. The percent of Asians in the County was 5 percent, while the percent of Asian households was 3.9 percent.

<b>Table - Publicly Supported Housing Residents by Race/Ethnicity</b>								
<b>(Clayton County, GA CDBG, HOME, ESG) Jurisdiction</b>	<b>Race/Ethnicity</b>							
	<b>White</b>		<b>Black</b>		<b>Hispanic</b>		<b>Asian or Pacific Islander</b>	
<b>Housing Type</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Public Housing	6	20.00%	24	80.00%	0	0.00%	0	0.00%
Project-Based Section 8	85	14.96%	476	83.80%	3	0.53%	4	0.70%
Other Multifamily	7	15.22%	39	84.78%	0	0.00%	0	0.00%
HCV Program	49	2.33%	2,048	97.34%	0	0.00%	6	0.29%
Total Households	14,929	17.36%	58,230	67.72%	8,033	9.34%	3,382	3.93%
0-30% of AMI	2,009	13.02%	10,321	66.86%	2,293	14.85%	503	3.26%
0-50% of AMI	3,621	12.68%	18,471	64.68%	4,230	14.81%	972	3.40%

0-80% of AMI	6,879	14.56%	31,098	65.82%	6,033	12.77%	1,699	3.60%
Note 1: Data Sources: Decennial Census; APSH; CHAS								
Note 2: #s presented are numbers of households not individuals.								
<a href="http://www.hudexchange.info">Note 3: Refer to the Data Documentation for details (www.hudexchange.info).</a>								

Hispanics had 14.9 percent of extremely low-income households and 14.8 percent of low-income households in the County, but their participation in publicly supported housing was less than 1 percent.

Asians (primarily Vietnamese in origin) made up 3.3 percent of extremely low-income households and 3.4 percent of low-income households in the County, but they also made up less than 1 percent of the population in publicly supported housing.

**ii. Compare the racial/ethnic demographics of each program category of publicly supported housing for the jurisdiction to the demographics of the same program category in the region.**

In comparing protected groups (elderly, disability, race and familial status) to the general population in Clayton County with regards to the population in publicly supported housing, persons who are elderly, disabled persons, Blacks, and families with children have a higher proportion of those in public housing programs than the general public in many categories. The figures from HUD provided AFH tables provide data for public housing households in racially/ethnically-concentrated areas of poverty (R/ECAP) tracts and non-R/ECAP tracts, and both are compared against the general population estimates. Data for this section is found in the table below, R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category. (Data note: The most recent HUD AFH maps show there are no R/ECAP tracts in Clayton County, however HUD AFH tables indicate there are R/ECAP tracts in the County.)

Elderly

According to the HUD provided AFH Data, elderly 65 and over made up approximately 6.7 percent of the population in Clayton County. The group accounted for a larger percentage of the population than in the general population for all publicly supported housing categories.

In R/ECAP tracts, publicly supported housing was available in two categories: Other HUD Multifamily units and the Housing Choice Voucher Program (HCV). Both were vastly overrepresented by the elderly population, with 100 percent in Other HUD Multifamily units (it must be noted that this program was specifically designed to house the elderly in the County), and the HCV Program with 23.2 percent of participants being elderly.

In non-R/ECAP tracts, publicly supported housing was available in three categories: Public Housing developments, Project-based Section 8, and the HCV Program. The elderly population was overrepresented in all three programs: 36.7 percent of residents in public housing developments, 11.7 percent of Project-based Section 8 residents, and 10.8 percent of HVC Program residents. See table below.

Persons with a Disability



According to the HUD provided AFH Tables , persons with a disability made up approximately 11.7 percent of the population in Clayton County ages 5 and up. Persons with a disability made up a larger percentage of the public housing population in two of the four housing categories.

In R/ECAP tracts, publicly supported housing was available in two categories: Other HUD Multifamily units and the Housing Choice Voucher Program (HCV). There were no (0%) persons with a disability in the “Other HUD Multifamily units” category. The percent of persons with a disability participating in the HCV Program was 22.2 percent – higher than the disabled population in the general population.

In non-R/ECAP tracts publicly supported housing was available in three categories: Public Housing developments, Project-based Section 8, and the HCV Program. Two of the three categories had a higher percent of persons with a disability than the percent of disabled persons in the general population. For public housing developments 13.3 percent of the residents were with a disability, and in the HCV Program 13.6 percent were with a disability – both being similarly close to the percent of persons with a disability in the general population, but still both higher. The percent of persons with a disability drops to 6.3 percent of the residents in Project-based Section 8 – lower than the general population estimates.

#### Blacks

Blacks made up approximately 64.9 percent of the population in Clayton County – the vast majority of the population. Even with a majority of residents in the County being Black, the group still overrepresented in all categories of publicly supported housing.

In R/ECAP tracts, publicly supported housing was available in two categories: Other HUD Multifamily units and the Housing Choice Voucher Program (HCV). Blacks made up 84.8 percent of the residents in Other HUD Multifamily units (residents in this group were also 100% elderly), and 95 percent in the HCV Program – both much higher than the percent of Blacks among the general population.

In non-R/ECAP tracts, publicly supported housing was available in three categories: Public Housing developments, Project-based Section 8, and the HCV Program. Blacks made up 80 percent of the residents in public housing developments, and 83.8 percent in the Section 8 housing – both much higher than the percent of Blacks in the general population. In the HCV program, 97.6 percent of residents were Black – much higher than the percentage of Blacks in the general population.

#### Families with Children

Families with children made up approximately 51.7 percent of the population in Clayton County. There were no specific patterns of residents in the four public housing category types.

In R/ECAP tracts, publicly supported housing was available in two categories: Other HUD Multifamily units and the Housing Choice Voucher Program (HCV). Families with children made up none of the residents in Other HUD Multifamily units (as mentioned above, residents in this group were 100% elderly), and 43.2 percent in the HCV Program – this was lower than the number of families with children in the general population.

In non-R/ECAP tracts, publicly supported housing was available in three categories: Public Housing

developments, Project-based Section 8, and the HCV Program. Families with children made up 50 percent of the residents in public housing developments, which was slightly lower than the family type in the general population. Approximately 72.9 percent in Project-based Section 8 was this family type – much higher the general population. Families with children were also higher in the HCV Program with 61.2 percent, which was likely due to the flexibility of being able to rent single housing units, which are better suited to larger families.

#### R/ECAP and Non-R/ECAP tract comparison for Publicly Supported Housing

As R/ECAP tracts represent a much smaller geographic portion of the County as compared to non-R/ECAP tracts, is not surprising to see fewer units in R/ECAP tracts when publicly supported housing is available in both tracts by category. Public housing developments and Project-based section housing can only be found in non-R/ECAP tracts in the County. Likewise, Other HUD Multifamily units can only be found in R/ECAP tracts. The only publicly supported housing category that operates in both tracts is the HCV Program, with 9.4 percent of units in R/ECAP tracts (170 units) compared to 90.6 percent in Non R/ECAP tracts (1,637 units).

<b>Table - R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category</b>								
<b>(Clayton County, GA CDBG, HOME, ESG) Jurisdiction</b>	<b>Total # units (occupied)</b>	<b>% White</b>	<b>% Black</b>	<b>% Hispanic</b>	<b>% Asian or Pacific Islander</b>	<b>% Families with children</b>	<b>% Elderly</b>	<b>% with a disability</b>
<b>Public Housing</b>								
R/ECAP tracts	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Non R/ECAP tracts	30	20.00%	80.00%	0.00%	0.00%	50.00%	36.67%	13.33%
<b>Project-based Section 8</b>								
R/ECAP tracts	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Non R/ECAP tracts	580	14.96%	83.80%	0.53%	0.70%	72.87%	11.65%	6.26%
<b>Other HUD Multifamily</b>								
R/ECAP tracts	48	15.22%	84.78%	0.00%	0.00%	0.00%	100.00%	0.00%
Non R/ECAP tracts	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
<b>HCV Program</b>								
R/ECAP tracts	170	3.87%	95.03%	0.00%	1.10%	43.24%	23.24%	22.16%
Non R/ECAP tracts	1,637	2.19%	97.55%	0.00%	0.21%	61.15%	10.76%	13.58%
Note 1: Disability information is often reported for heads of household or spouse/co-head only. Here, the data reflect information on all members of the household.								
Note 2: Data Sources: APSH								
Note 3: Refer to the Data Documentation for details ( <a href="http://www.hudexchange.info">www.hudexchange.info</a> ).								

- iii. Compare the demographics, in terms of protected class, of residents of each program category of publicly supported housing (public housing, project-based Section 8, Other Multifamily Assisted developments, and HCV) to the population in general, and persons who meet the income eligibility requirements for the relevant program category of publicly supported housing in the jurisdiction and region. Include in the comparison, a description of whether there is a higher or lower proportion of groups based on protected class.

Four race/ethnic groups were recorded in HUD AFH Data Table – Publicly Supported Households by Race/Ethnicity. This table displays the percentage of residents from the race/ethnic groups that resided in publicly supported housing and their income level in the County by category (0-30%, 0-50% and 0-80% AMI). The groups recorded were: White, Black, Hispanic and Asian. In all housing program categories, Black households represented a higher percentage of the residents in public housing as compared to the percent of the households in all low- and moderate-income categories. On the other hand, Hispanic and Asian households represented much smaller shares of the residents in public housing program categories than the percentage of the race/ethnic group in all low- and moderate-income categories – meaning many Hispanic and Asian households were eligible for public housing, but did not utilize it. Representation in public housing categories for White households was varied.

Table - Publicly Supported Housing Residents by Race/Ethnicity								
(Clayton County, GA CDBG, HOME, ESG) Jurisdiction	Race/Ethnicity							
	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	6	20.00%	24	80.00%	0	0.00%	0	0.00%
Project-Based Section 8	85	14.96%	476	83.80%	3	0.53%	4	0.70%
Other Multifamily	7	15.22%	39	84.78%	0	0.00%	0	0.00%
HCV Program	49	2.33%	2,048	97.34%	0	0.00%	6	0.29%
Total Households	14,929	17.36%	58,230	67.72%	8,033	9.34%	3,382	3.93%
0-30% of AMI	2,009	13.02%	10,321	66.86%	2,293	14.85%	503	3.26%
0-50% of AMI	3,621	12.68%	18,471	64.68%	4,230	14.81%	972	3.40%
0-80% of AMI	6,879	14.56%	31,098	65.82%	6,033	12.77%	1,699	3.60%
Note 1: Data Sources: Decennial Census; APSH; CHAS								
Note 2: #s presented are numbers of households not individuals.								
Note 3: Refer to the Data Documentation for details ( <a href="http://www.hudexchange.info">www.hudexchange.info</a> ).								

#### Publicly Supported Housing and Income Eligibility: Black Households

Black households made up at least 80 percent or more of all publicly supported housing categories, and almost all of the residents in the HCV program (97.3%). This was higher than the percentage of the race group in each low- and moderate-income category (0-30%, 0-50% and 0-80% AMI) in the County. Black households made up 66.9 percent of all extremely low-income households, 64.7 percent of all low-income households, and 65.8 percent of all moderate-income households. These figures align with the percentage of Black households in the County (67.7%).

#### Publicly Supported Housing and Income Eligibility: Hispanic Households

Hispanic households made up less than 1 percent or lower of all publicly supported housing categories. This was much lower than the ethnic group in each low- and moderate-income category (0-30%, 0-50% and 0-80% AMI) in the County. Hispanic households made up 14.9 percent of all extremely low-income households, 14.8 percent of all low-income households, and 12.8 percent of all moderate-income households. A higher percentage of Hispanic households were extremely low-, low-, and moderate income as compared to the percentage of Hispanic households in the County (9.3%). This points to Hispanic households not utilizing publicly supported housing, even though many are eligible for these housing services.

#### Publicly Supported Housing and Income Eligibility: Asian Households

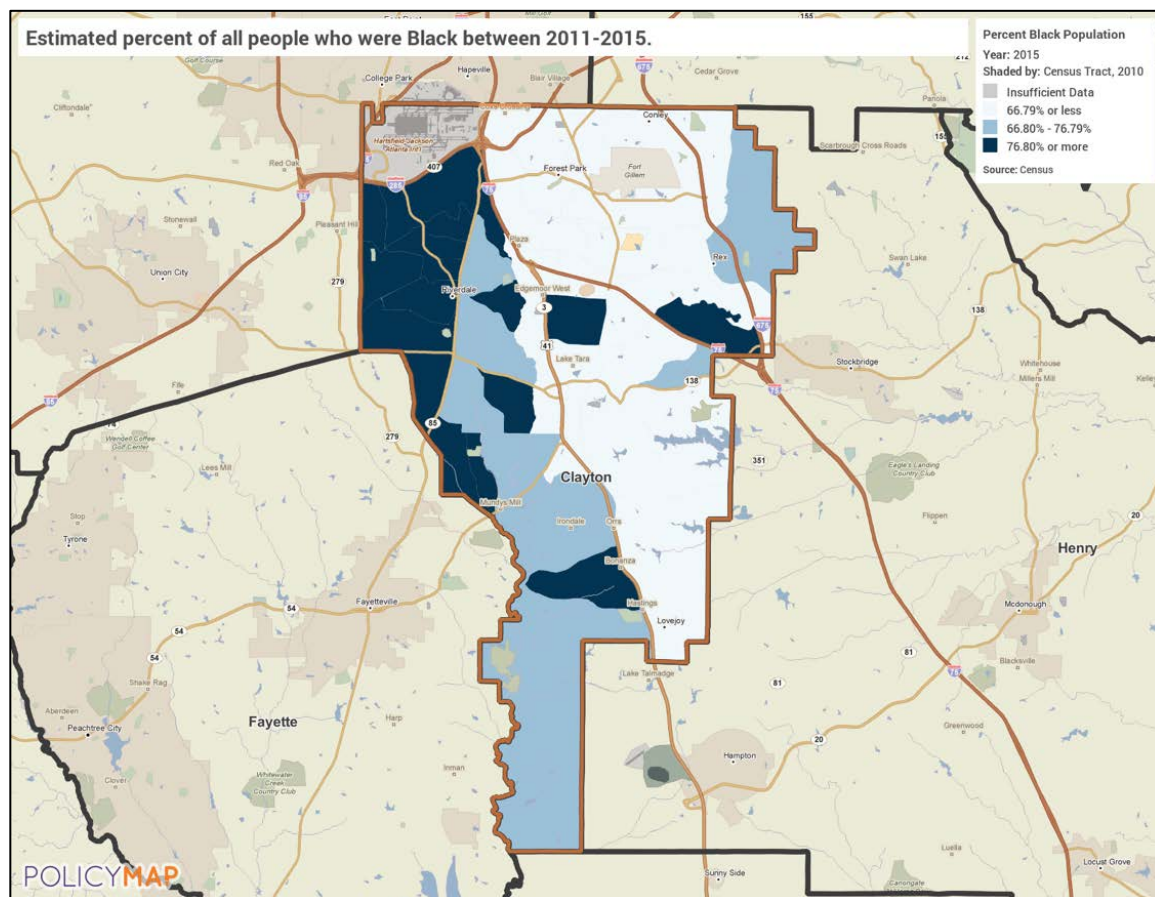
Asian households also made up less than 1 percent or lower of all publicly supported housing categories. This was also lower than the percentage of Asian households for each low- and moderate-income category (0-30%, 0-50% and 0-80% AMI) in the County. Asian households made up 3.3 percent of all extremely low-income households, 3.4 percent of all low-income households, and 3.6 percent of all moderate-income households. Asian households with either extremely low-, low-, or moderate income were slightly lower as compared to the percentage of Asian households in the County (3.9%). This also points to Asian households not utilizing publicly supported housing even while there were households eligible for these housing services.

**a. Publicly Supported Housing Location and Occupancy**

**i. Describe patterns in the geographic location of publicly supported housing by program category (public housing, project-based Section 8, Other Multifamily Assisted developments, HCV, and LIHTC) in relation to previously discussed segregated areas and R/ECAPs in the jurisdiction and region.**

According to HUD, a concentration is defined as the existence of ethnic/racial minorities in a Census Tract at a rate of 10 percent or higher than the County as a whole. In 2015, the population in Clayton County was 66.8 percent Black (2011-2015 ACS). A concentration of the race group would be a tract with 76.8 percent or higher population of the race group. Below is a map of areas where there is a concentration of Blacks.

MAP: Black Population, Concentration



Source: 2011-2015 ACS via PolicyMap

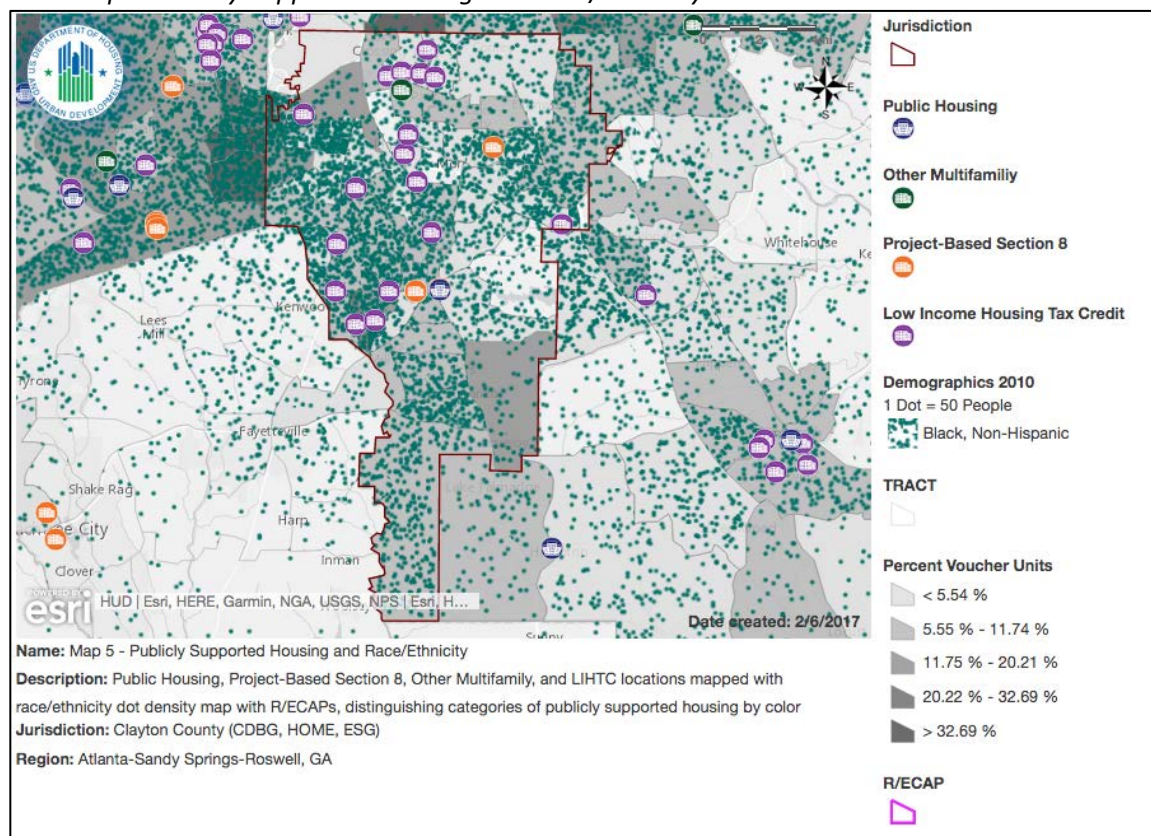
Clayton County has several areas where there is a high concentration of Blacks, with the most notable area located in the northwest corner of the County just south of Hartsfield-Jackson Atlanta International Airport. Other areas are northeast of I-675, Sherwood Forest/Oak Forest located in the center of the

County, and north along McDonough Rd. In general, the western border of the County has a higher percentage of Blacks than the rest of the County.

### Public Housing

The map below displays visually the geographic location of Public Housing developments.

*HUD Map – Publicly Supported Housing and Race/Ethnicity*



The map above shows the concentration of Blacks in the County by dot density (1 Dot = 50 People). The dot density map along with a percentage/concentration map offers a more complete picture of the location of each race group in the County. Correlation between the concentration and density of the population can provide important details in identifying appropriate priority areas. Currently, there is one public housing development operated by the Jonesboro Housing Authority, which is located in the City of Jonesboro, the geographic center of the County.

### Housing Choice Vouchers

While Black residents are the majority of the population in Clayton County, they are found in higher concentrations in the western areas of the County. HCV Program households are also found in higher concentrations in the western area of the County, though program participation was generally high across the County. See map above.



### Project-Based Section 8

Project-Based Section 8 housing units can be found in a couple of locations in the County. According to HUD Map 5, they are located in areas just outside of more concentrated Black populated areas.

### HUD Multifamily Assisted Developments and LIHTC

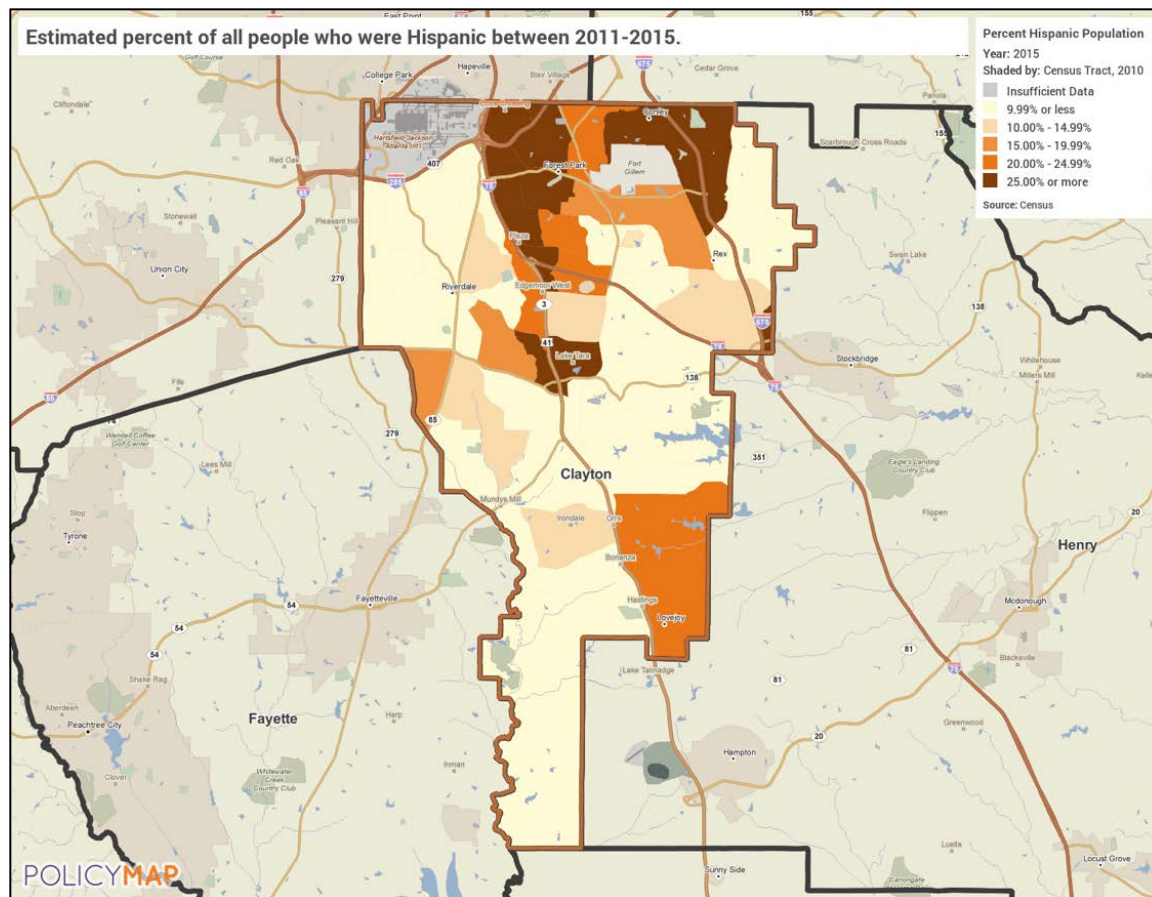
HUD Multifamily Assisted Developments and LIHTC properties run up and down the County, but LIHTC properties also appear to be located and clustered in areas with a higher concentration of Blacks. LIHTC developments in particular are clustered in the western areas of the County where a higher percentage of the Black population can be found.

### *Hispanics and Publicly Supported Housing*

Hispanics make up 13.7 percent of the County population and can be found in areas where there are a number of LIHTC housing units, but they make up less than 1 percent of publicly supported housing residents.

MAP: Hispanic Population





Source: 2011-2015 ACS via PolicyMap

Some areas in north central Clayton County had over 25 percent of the population as persons who identified as Hispanic.

**ii. Describe patterns in the geographic location for publicly supported housing that primarily serves families with children, elderly persons, or persons with disabilities in relation to previously discussed segregated areas or R/ECAPs in the jurisdiction and region.**

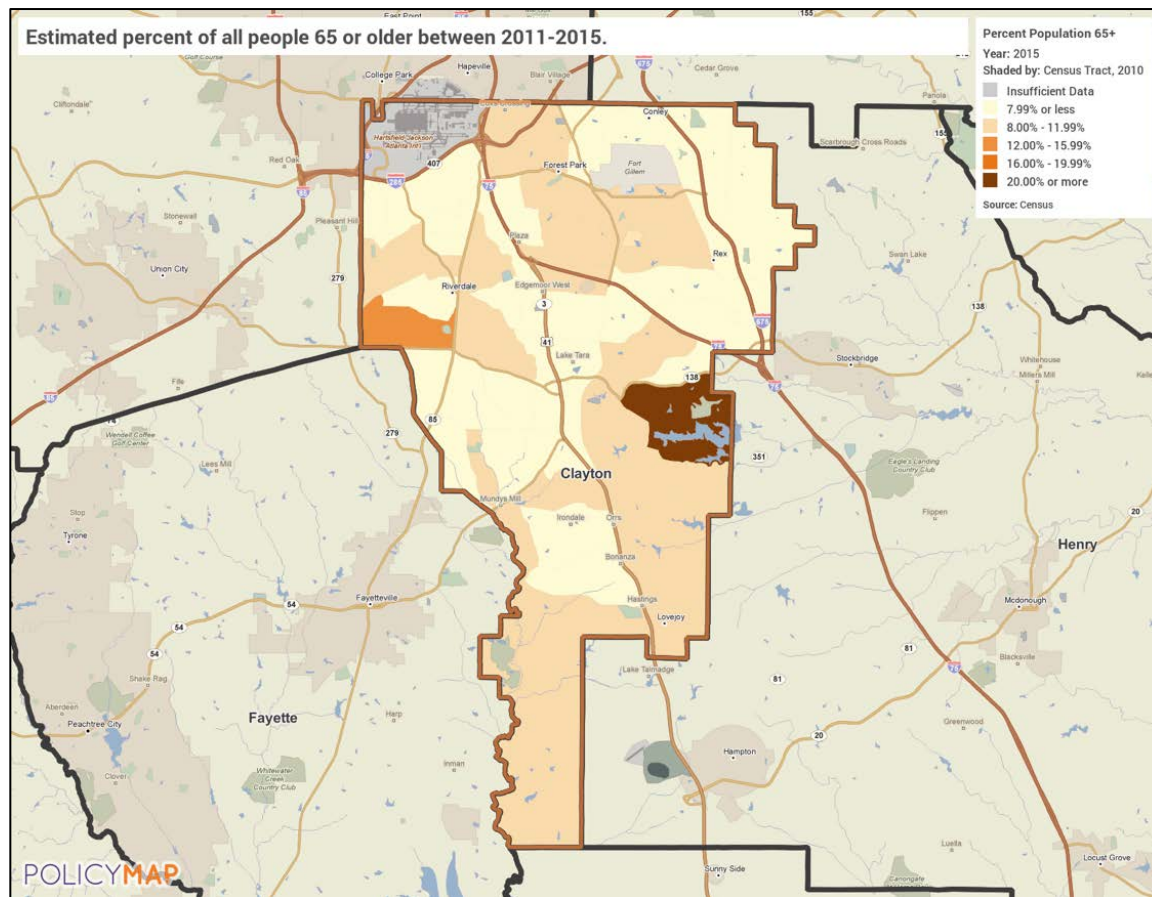
A description of each group can be found below as each group differs:

### Elderly

Elderly 65 years and over only make up 6.7 percent of the population, but there are some areas of the County where they are found in higher numbers. On the western border of the County, one area has a slightly higher amount of elderly than the rest of the surrounding area (Census tract 13063040513, Riverdale area), and one area on the eastern border has the highest concentration (Census tract 13063040614), east Jonesboro). This area is also the location of two Other HUD Multifamily units, which makes sense, as these types of units are 100 percent elderly.

According to HUD Map 5, there are no public development units, Project-based Section 8, or LIHTC housing in this area, and the HCV Program participant rate is also very low.

#### MAP: Population 65 Years and Older



Source: 2011-2015 ACS via PolicyMap

#### Families with Children

There were 31,897 families with children in Clayton County – approximately 51.7 percent of the total families in the County. The average family size was 3.7 persons, higher than the state average family size of 3.3 persons (2011-2015 ACS – S1101). In regards to publicly supported housing, the percentage of families with children in public housing varied depending on housing category. For the public housing development in Jonesboro, 50 percent of the residents were families with children – right in line with general population estimates for the family type. Project-Based Section 8 housing had more residents that were families with children than all other types of publicly supported housing with 72.9 percent – much higher than comparable general population estimates.

<b>TABLE: Family Type</b>				
	<b>(Clayton County, GA CDBG, HOME, ESG) Jurisdiction</b>		<b>(Atlanta-Sandy Springs-Roswell, GA) Region</b>	
Families with children	31,897	51.71%	662,976	49.99%
Note 1: All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total families. Note 2: 10 most populous places of birth and languages at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately. Note 3: Data Sources: Decennial Census; ACS Note 4: <a href="http://www.hudexchange.info">Refer to the Data Documentation for details (www.hudexchange.info)</a> .				

HCV program participants were located in both R/ECAP and non-R/ECAP tracts. The percent of families with children in the HCV Program in non-R/ECAP tracts was 61.2 percent – higher compared to the percent of families with children in the general population. However, families with children made up less than 43.2 percent of program participants in R/ECAP tracts.

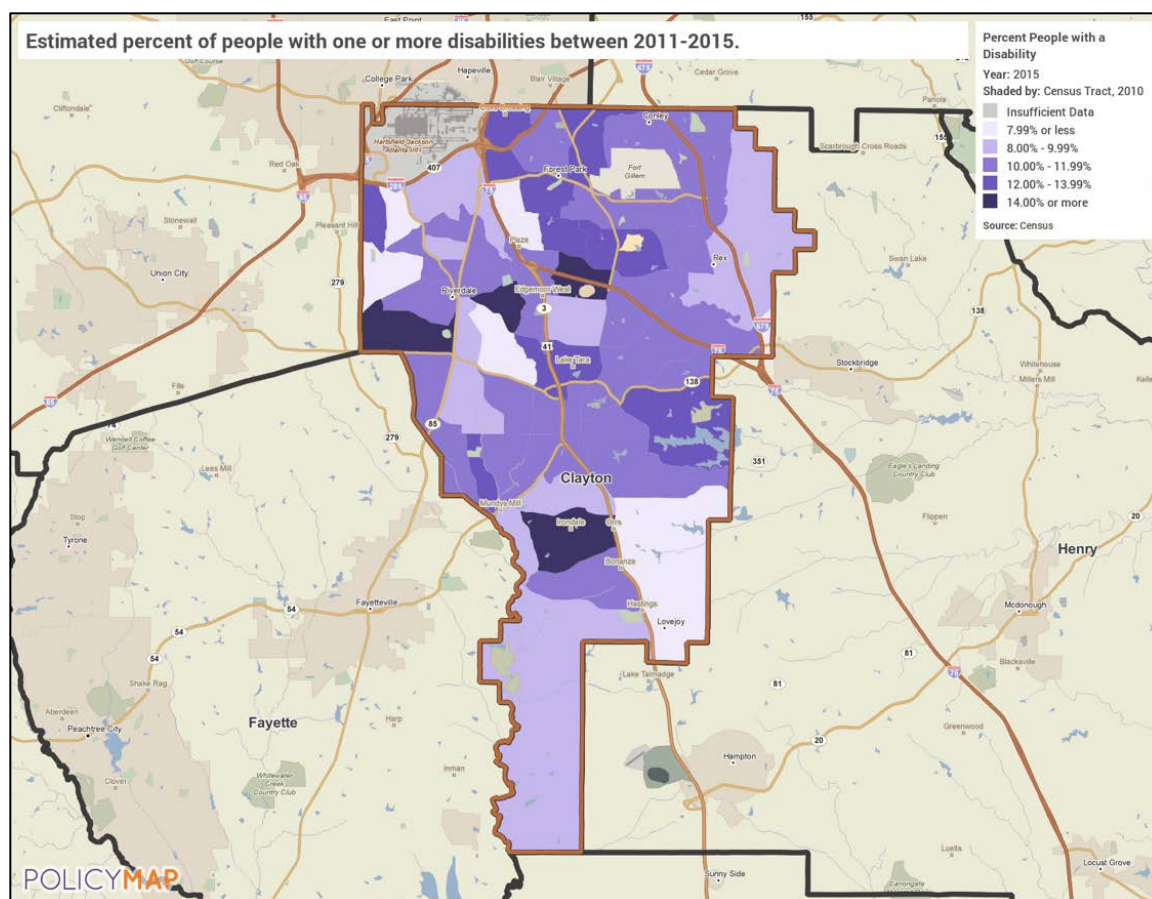
The HCV program has a higher percent of voucher use in the western and southern areas of the County. These areas are also where there is a higher concentration of the County’s Black population.

#### Disability

The HCV Program was the only program with participants in both R/ECAP tracts and non-R/ECAP tracts. Approximately 22.2 percent of the participants in R/ECAP tracts had a disability, while only 13.6 percent of the residents had a disability in non-R/ECAP tracts – still slightly higher than the percentage of disabled in the general population.

Public housing developments (in Jonesboro) and Project-based Section 8 units also had a slightly higher percentage of persons with a disability than the general population. There were more disabled persons in the northwest area of the County. This area also had a higher concentration of HCV program voucher use and a higher concentration of LIHTC housing.

MAP: Disability



Source: 2011-2015 ACS via PolicyMap

Three areas in northwest Clayton County and one area in the Irondale area to the south display a higher percentage of the population with a disability than the rest of the County.

**iii. How does the demographic composition of occupants of publicly supported housing in R/ECAPS compare to the demographic composition of occupants of publicly supported housing outside of R/ECAPS in the jurisdiction and region?**

Only one type of publicly supported housing is located in R/ECAP tracts in Clayton County – the HCV program. There were no public housing developments and Project-based Section 8 housing sites located in R/ECAP tracts in the County. Below is a description of the demographic composition of the HCV Program in R/ECAP tracts as compared to those in non-R/ECAP tracts.

**HCV Program**

Far more HCV Program units were located in non-R/ECAP tracts compared to units within R/ECAP tracts in Clayton County. There were only 170 occupied units in R/ECAP tracts compared to 1,637 occupied units in non-R/ECAP tracts. However, in a breakdown of the composition of specific protected groups, the elderly had a higher representation in R/ECAP tracts with 22.2 percent of units in HCV programs,

compared to just 10.8 percent in non-R/ECAP tracts. Persons with a disability also had a higher representation in R/ECAP tracts with 22.2 percent of units in HCV programs, compared to 13.6 percent in non-R/ECAP tracts.

Blacks have slightly fewer households represented in R/ECAP tracts with 95 percent in HCV programs, compared to 97.6 percent in non-R/ECAP tracts. There were also fewer families with children in R/ECAP tracts in HCV programs (43.2%), compared to 61.2 percent in non-R/ECAP tracts. See Table R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category above.

**iv. (A) Do any developments of public housing, properties converted under the RAD, and LIHTC developments have a significantly different demographic composition, in terms of protected class, than other developments of the same category for the jurisdiction? Describe how these developments differ.**

The Rental Assistance Demonstration was created in order to give public housing authorities, such as the Jonesboro Housing Authority (JHA) in Clayton County, the ability to preserve and improve public housing properties and address maintenance issues. The Low-Income Housing Tax Credit (LIHTC) is a resource for creating affordable housing in the County. With these programs come some basic requirements involving fair housing and protecting some classes and low- and moderate-income households.

Approximately 67.7 percent of the households in Clayton County were Black households, but the race group was represented in higher percentages in publicly supported housing units. Hispanic households represented 9.3 percent of the total percent of households in the County, but less than 1 percent of residents were from the ethnic group. Below is a description of the demographic composition of the developments.

#### *Public Housing Development*

At this time, the public housing development shows low diversity. According to HUD AFH Table 8, the lone Public Housing development in Jonesboro is primarily Black (80%). Families with children make up 50 percent of the development's residents, which is slightly below the County's rate of 51.7 percent. None of the residents were Hispanic or Asian.

#### *Project-Based Section 8*

There are five Project-based Section 8 development units spread across the County. These units also show segregation, as four of the five sites are 87 percent or higher Black. All sites have 66 percent or more families with children. Three percent of the households in Riverwood are Hispanic, but the rest of the Section 8 housing had 1 percent or fewer Hispanic households. Asians accounted for 3 percent of households in Riverwood Townhouses 2 and 2 percent of households in Riverwood Townhouses 3. All other Section 8 housing had less than 1 percent Asian households or data was not available for the race group.

#### *Other HUD Multifamily Assisted Housing*

Governor's Terrace is an all elderly housing site and is 15 percent White, 83 percent Black, 2 percent Asian.



There were no Hispanic households in Other HUD Multifamily Assisted Housing. The site does not have any families with children. See table below.

<b>Table - Demographics of Publicly Supported Housing Developments, by Program Category</b>								
<b>Development Name</b>	<b>PHA Code</b>	<b>PHA</b>	<b># Units</b>	<b>White</b>	<b>Black</b>	<b>Hispanic</b>	<b>Asian</b>	<b>HHs with Children</b>
<b>Public Housing</b>								
<b>(Clayton County, GA CDBG) Jurisdiction</b>								
Unnamed Project	GA228	JHA	30	20%	80%	0%	N/a	50%
<b>Public Housing</b>								
<b>(Clayton County, GA CDBG) Jurisdiction</b>								
Riverwood Townhouses 2	N/a	N/a	85	7%	87%	3%	3%	66%
Southwood Apartments	N/a	N/a	163	35%	63%	1%	N/a	70%
Riverwood Townhouses 1	N/a	N/a	83	4%	95%	1%	N/a	74%
Keystone Apartments	N/a	N/a	184	9%	91%	0%	1%	77%
Riverwood Townhouses 3	N/a	N/a	96	7%	90%	0%	2%	77%
<b>Public Housing</b>								
<b>(Clayton County, GA CDBG) Jurisdiction</b>								
Governor's Terrace	N/a	N/a	48	15%	83%	0%	2%	N/a
Note 1: For LIHTC properties, this information will be supplied by local knowledge.								
Note 2: Percentages may not add to 100 due to rounding error.								
Note 3: Data Sources: APSH								
Note 4: Refer to the Data Documentation for details ( <a href="http://www.hudexchange.info">www.hudexchange.info</a> ).								

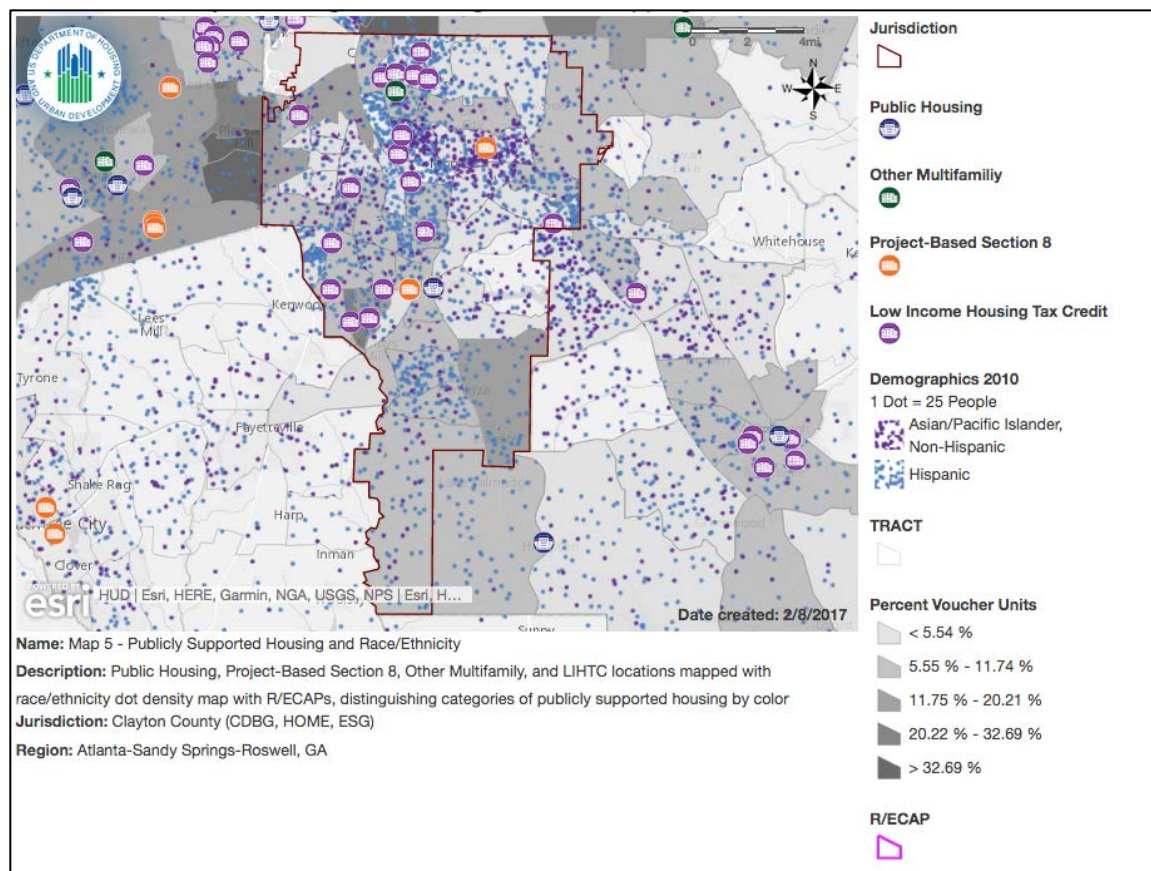
**(B) Provide additional relevant information, if any, about occupancy, by protected class, in other types of publicly supported housing for the jurisdiction and region.**

Southwood Apartments, Project Based Section 8

Southwood Apartments, a 163-unit site, is located between I-75 and I-675 in Morrow in the northeast half of the county in Census Tract 13063040408. According to the 2011-2015 ACS, the City of Morrow is 26.2 percent White, 37.3 percent Black, and 29.7 percent Asian (primarily Vietnamese). Persons who identify as Hispanic make up 7.3 percent of the population in the city.

Southwood Apartments was the only Project-based Section 8 housing site to have less than 87 percent Black residents (63% Black), but there were fewer than 1 percent Hispanics and Asians at the site. See Table - Demographics of Publicly Supported Housing Developments, by Program Category from the above. The map below displays the Section 8 housing site in an area with a concentration of Asians.

*HUD MAP – Publicly Supported Housing and Race/Ethnicity – Asian & Hispanic*



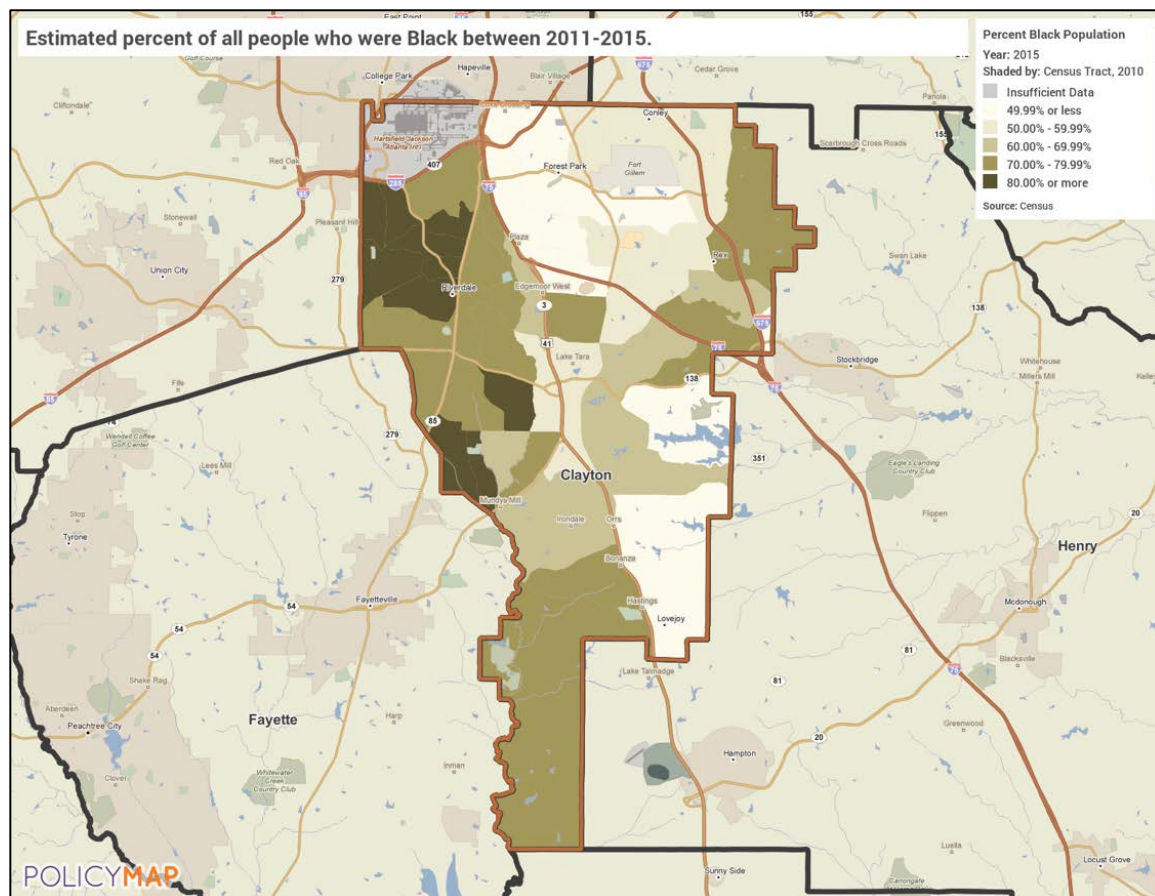
v. Compare the demographics of occupants of developments in the jurisdiction, for each category of publicly supported housing (public housing, project-based Section 8, Other Multifamily Assisted developments, properties converted under RAD, and LIHTC) to the demographic composition of the areas in which they are located. For the jurisdiction, describe whether



developments that are primarily occupied by one race/ethnicity are located in areas occupied largely by the same race/ethnicity. Describe any differences for housing that primarily serves families with children, elderly persons, or persons with disabilities.

According to the 2011-2015 ACS via PolicyMap, in the majority of areas in the County, 50 percent or more of the population is Black. Blacks are found in higher concentrations on the western half of the County, especially along the border where the percentage of Black residents can be as high as 80 percent or more.

MAP: Black Population



Source: 2011-2015 ACS via PolicyMap

### *Public Housing Development*

The public housing development in Jonesboro is located in Census Tract 13063040613 on S. Main St Rd. The tract has a Black population of 60.3 percent, which is less than the percent of Black residents in the development (80%). As the Jonesboro Housing Authority is the only housing authority operating locally, this is the County's only public housing development. Based on demographic maps, Blacks are more concentrated in areas west of the city. The tract has a Hispanic population of 7 percent and there are no Hispanic residents in the development.

### *Project-Based Section 8*

Project-based Section 8 housing can be found throughout the County, but is not necessarily concentrated in areas where the percentage of Blacks is highest in the County (the west side of Clayton County). Hispanics and Asians make up a very small number of the residents for Section 8 housing.

### *Other HUD Multifamily*

Other HUD Multifamily units can be found in the northern half of the County. It is difficult to determine a direct correlation between the location of these units and the percent of Black residents in the units, as Clayton County already has a Black majority population. This area, however, is home to a large percentage of Hispanics in the County. It has been established that Hispanics are 13.7 percent of the population and 9.3 percent of all households in the County. Hispanics also accounts for 14.9 percent of extremely low-income households, yet none of the Other HUD Multifamily units have Hispanic households residing in them. While there are many Hispanic households that may qualify for public housing, they are not using Other HUD Multifamily housing units. *HUD Map – Publicly Supported Housing and Race/Ethnicity*

### *HCV Program*

There is a high percentage of HCV Program voucher units on the west side of Clayton County and some southern areas of the County. The west side of the County has a larger percentage of Blacks, which correlates with the high use of vouchers for the race group in general. Hispanics populate some of the areas with a higher percentage of voucher usage, such as the north central tracts and in the southeast corner of the County, but they do not participate in the HCV program.

See Table - Demographics of Publicly Supported Housing Developments, by Program Category from the above.

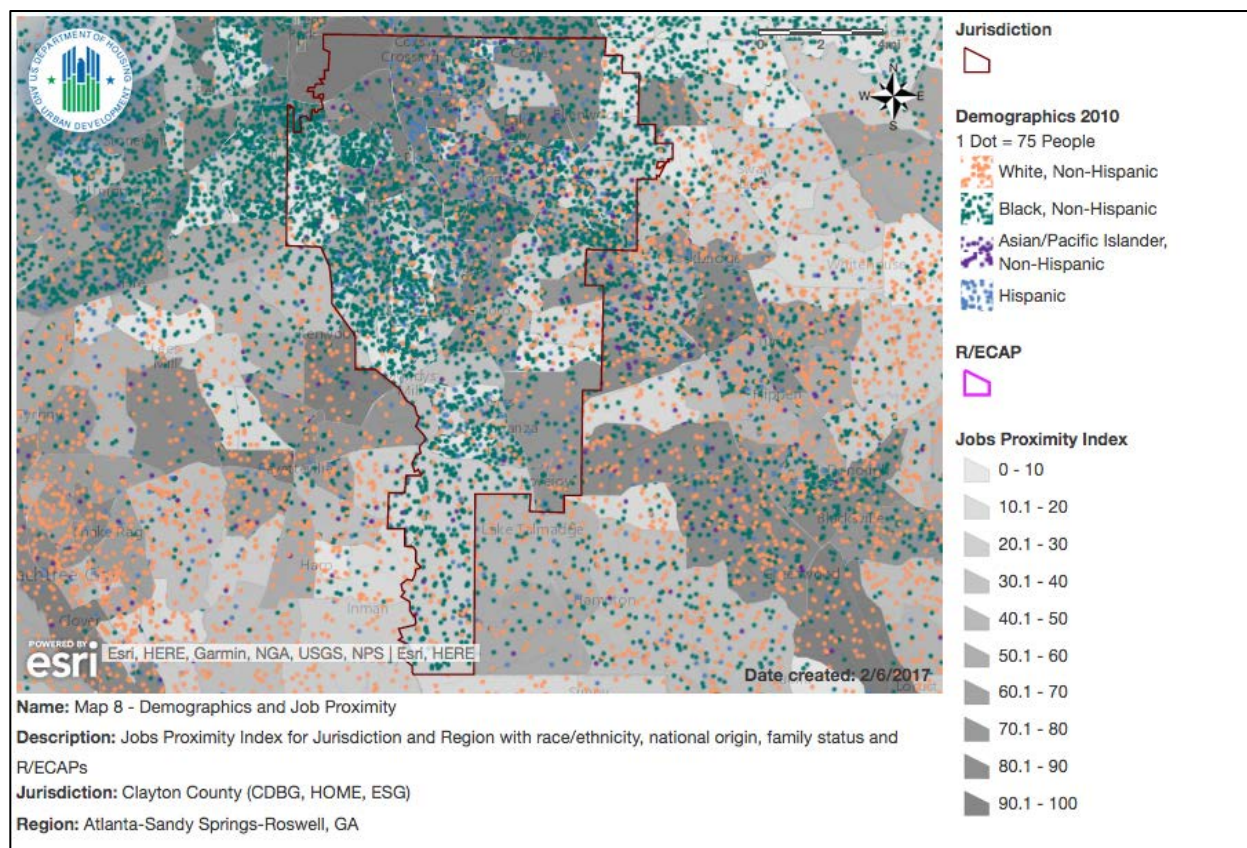
**b. Disparities in Access to Opportunity**

**i. Describe any disparities in access to opportunity for residents of publicly supported housing in the jurisdiction and region, including within different program categories (public housing, project-based Section 8, Other Multifamily Assisted Developments, HCV, and LIHTC) and between types (housing primarily serving families with children, elderly persons, and persons with disabilities) of publicly supported housing.**

Access to High Wage Jobs

Based on the HUD AFH Maps, areas where there is a concentration of public housing developments, Project-Based Section 8, and especially LIHTC housing fall mostly within the areas with a high percentage in the Job Proximity Index, which according to HUD measures the physical distances between place of residence and jobs. The Jobs Proximity Index is highest in the northwest to north central area of the County and runs down along US-41 to the southeast corner of the County.

MAP: Jobs Proximity Index, Race/Ethnicity



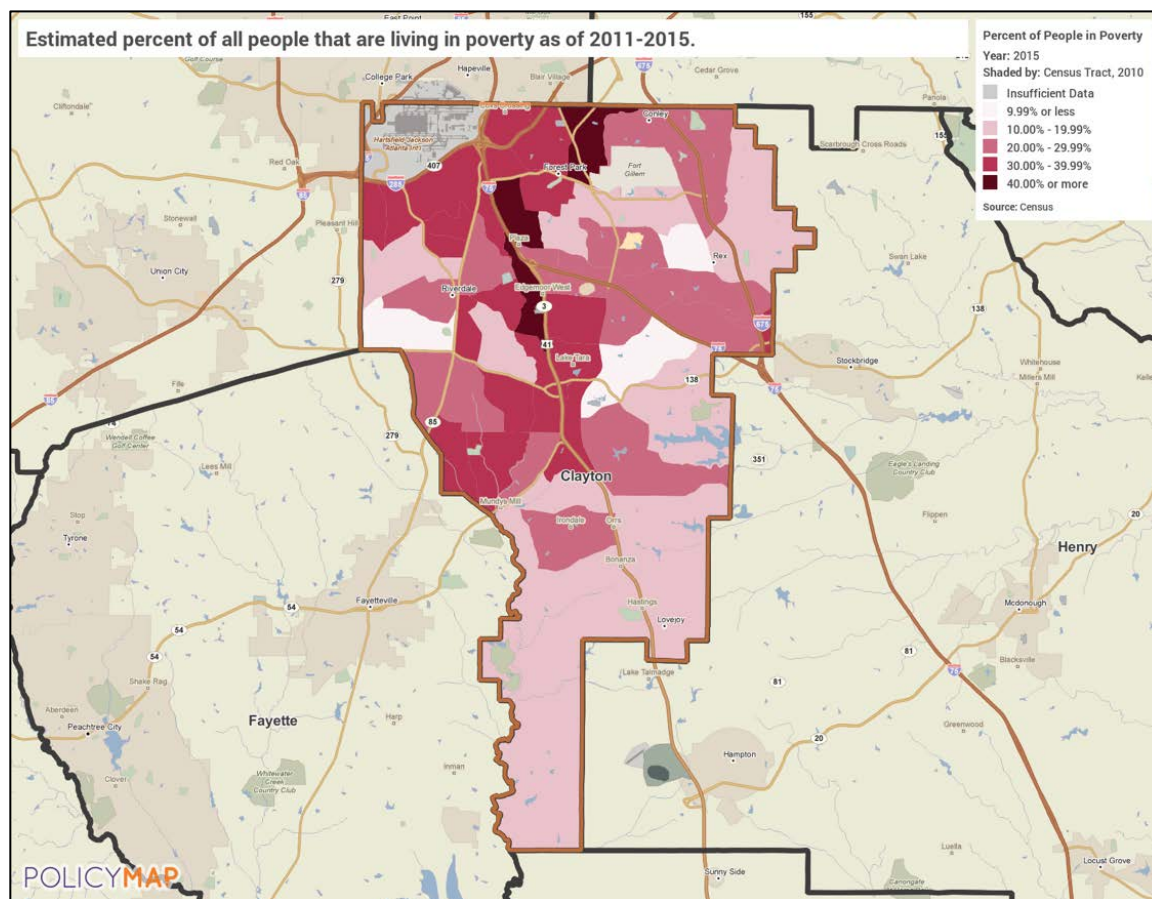
Source: HUD

While the Job Proximity Index is high in these areas, they were also some of the areas with the highest poverty rate in the County. A high amount of all types of publicly supported housing fall within or in close



proximity to areas where the poverty rate is higher than 30 percent – especially LIHTC housing. North central Clayton County residents also experience higher poverty as compared to the rest of the County with some areas as high as 40 percent in poverty. This points to a lack of high wage jobs in these areas for many residents in Clayton County.

MAP: People Living in Poverty

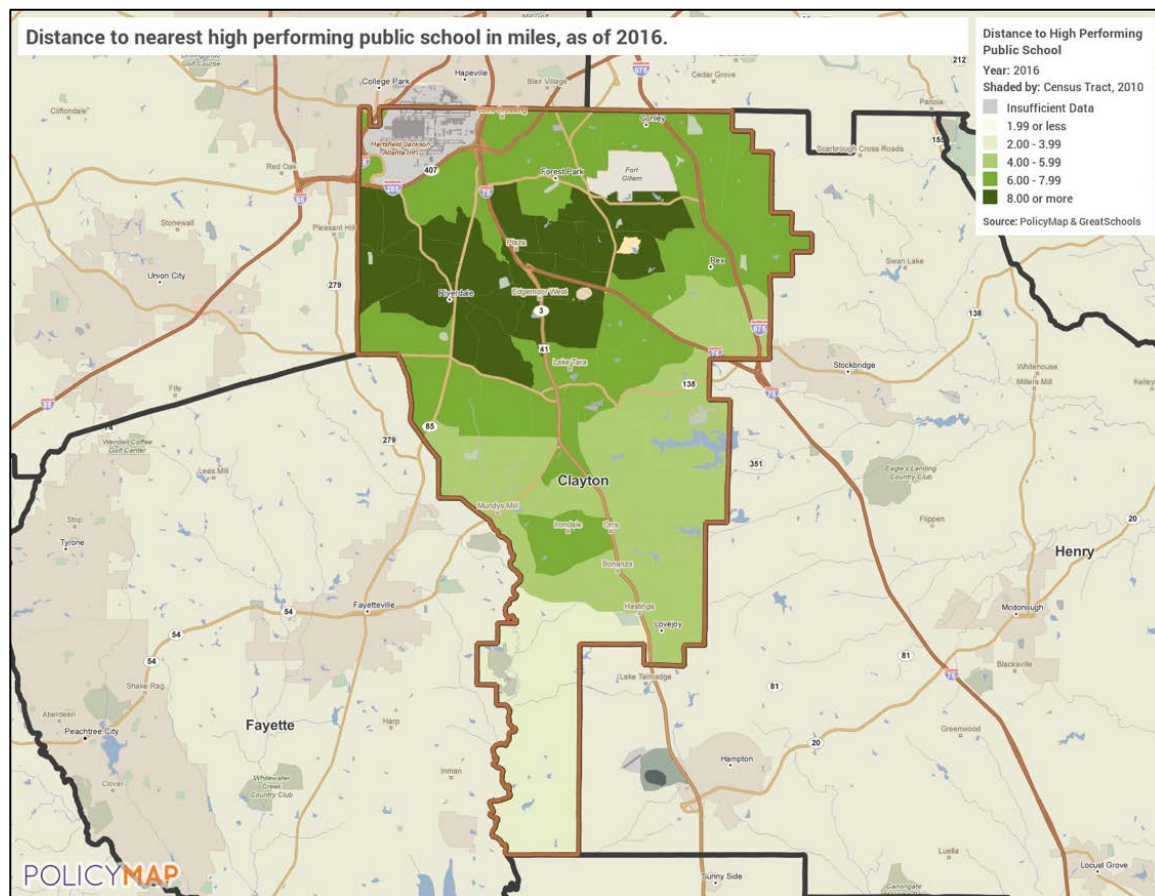


Source: 2011-2015 ACS via PolicyMap

### Access to High Performing Schools

Hispanics are not finishing college at the rate of the general population in Clayton County. According to the 2011-2015 ACS (C15002I), in 2015 only 5.2 percent of Hispanics 25 years and over had a Bachelor's degree or higher, which is below the countywide rate of 18.3 percent. As Hispanics are 13.7 percent of the total population of the County (See HUD provided data table – Racial and Ethnic Demographics), when the race group is removed from the countywide percentage of those with a Bachelor's degree or better, the disparity can be expected to increase. Preparing students to succeed in college starts at elementary and high school. High performing public schools (elementary through high school) are vital for the development of students. (Source: 2011-2015 ACS C15002B, S1501)

## MAP: Distance to Nearest High Performing School



Source: 2016 GreatSchools via PolicyMap

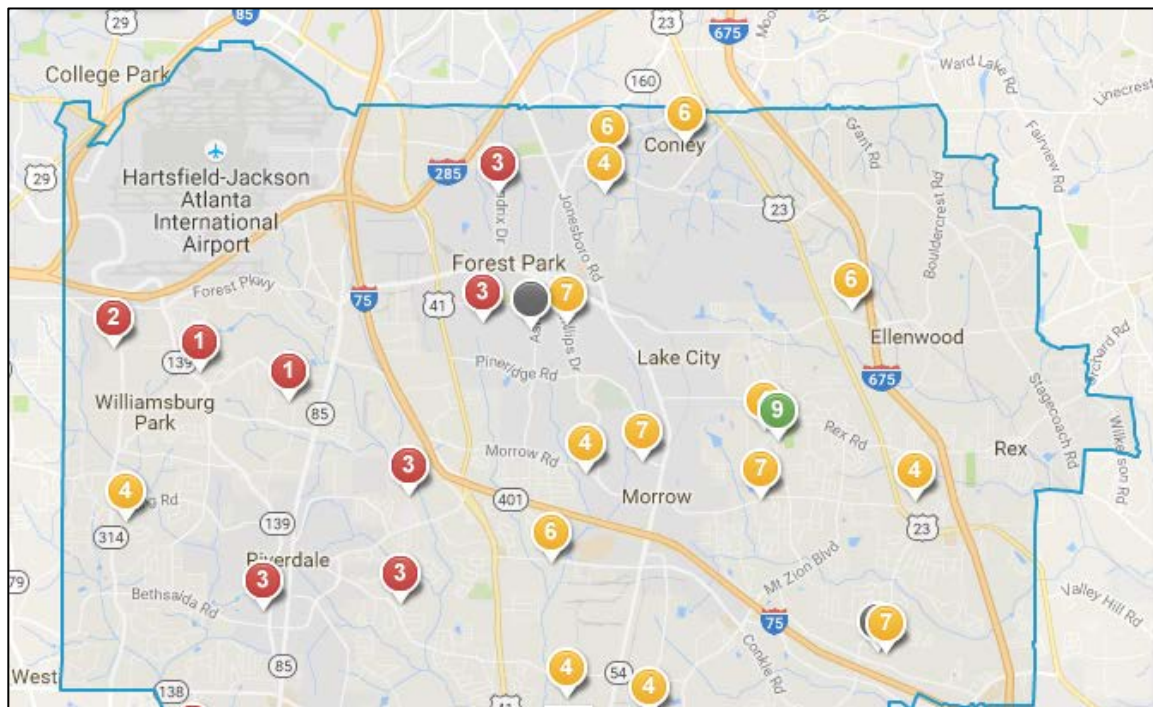
A higher percentage of the Hispanic population can be found in the north central areas of the County. This is also the location of areas furthest from high performing schools as reported by GreatSchools. GreatSchools is a nationally recognized non-profit that ranks public schools across the nation as high performing or low performing and provides profiles and also offers resources for parents and schools.

According to GreatSchools, the quality of public schools is lower performing in north central Clayton County than in schools outside of these tracts. The quality of public schools is also lower performing in areas just south of the international airport.

The following maps show the location of high and low performing schools and their location in regards to north central Clayton County – where the proximity to high performing schools is lowest in the County according to GreatSchools. Green markers indicate schools with a higher performance rating of 8 or better, orange markers are average performing schools of 4-7, and red markers are the lowest performing

schools with a rating of 3 or lower. Gray markers have no ranking. Schools are categorized into elementary, middle and high schools.

### *Elementary High/Low Performing Schools – North Central Clayton County*

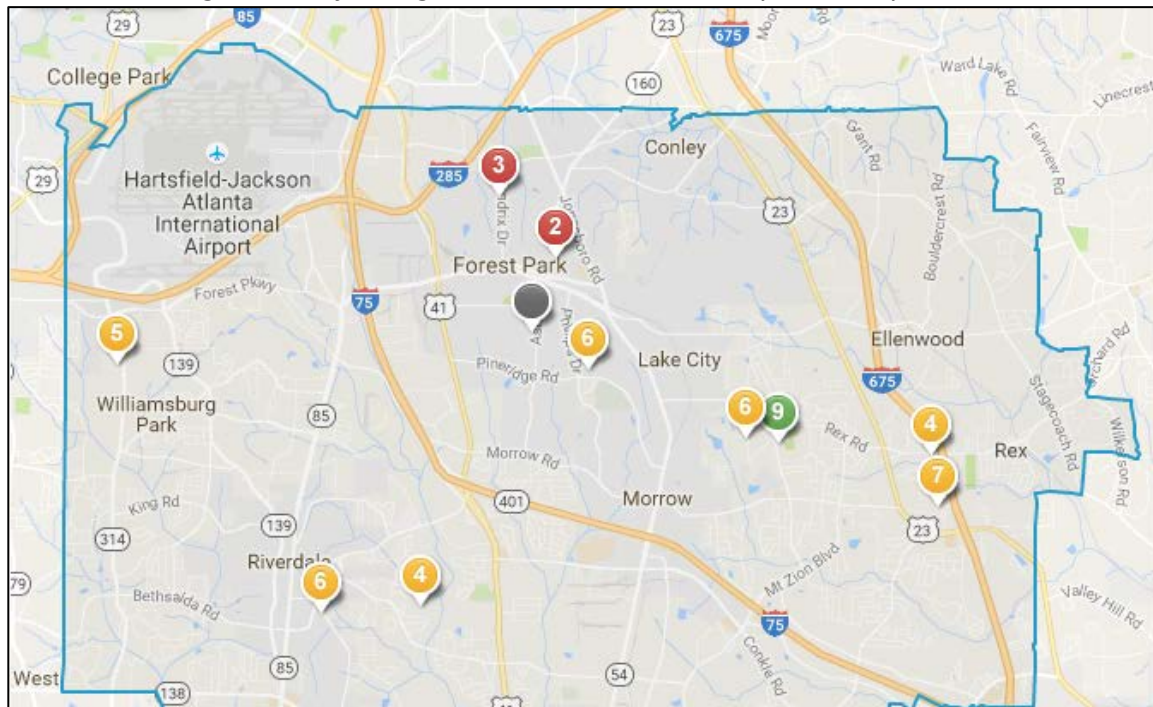


Source: GreatSchools, 2016

There is only one high performing elementary school in the northern half of Clayton County (Elite Scholars Academy). The vast majority of schools in the northern area of the County are average and low performing schools. Low performing schools populate the tracts in the western half of the County just south of the international airport.



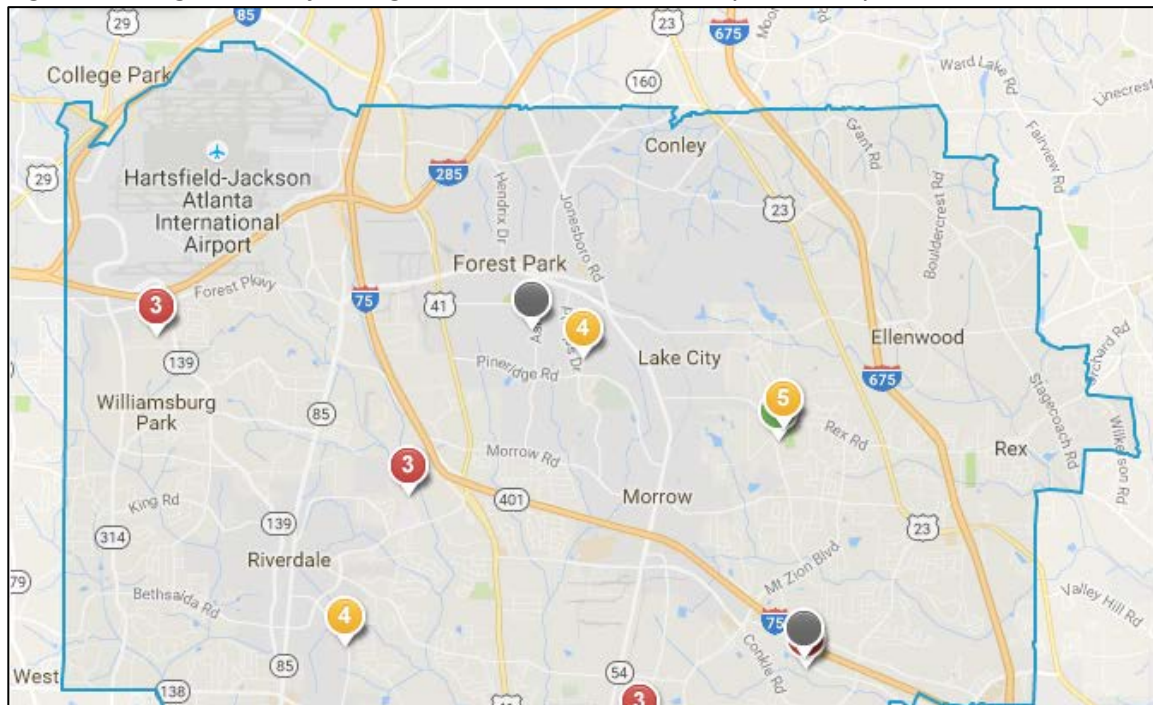
*Middle School High/Low Performing Schools – North Central Clayton County*



Source: GreatSchools, 2016

The two lowest performing schools are located in or near Forest Park. The majority of the middle schools in the northern half of the County are average performing schools. Again, there is only one high performing school in the northern half of Clayton County (Elite Scholars Academy).

### *High School High/Low Performing Schools – North Central Clayton County*



Source: GreatSchools, 2016

There is a low performing high school located near the international airport and another north east of Riverdale. Two other low performing high schools are located in the City of Jonesboro. Another three schools are only average performing. Again, there is only one high performing high school in the northern half of Clayton County (Elite Scholars Academy).

Data Note: GreatSchools calculates each rating by averaging that school's ratings for all grade/subject combinations.

## **1. Additional Information**

### **a. Beyond the HUD-provided data, provide additional relevant information, if any, about publicly supported housing in the jurisdiction and region, particularly information about groups with other protected characteristics and about housing not captured in the HUD-provided data.**

Other groups with protected characteristics not listed in the HUD provided data include the lesbian, gay, bisexual or transgender (LGBT) community, persons with criminal backgrounds, and persons with HIV/AIDS and their families. Below is a description of these groups with regards to publicly supported housing in Clayton County.

#### Housing Discrimination against LGBT Individuals.

The Fair Housing Act prohibits housing discrimination based on race, color, national origin, religion, sex, disability, and familial status, however it does not specifically include sexual orientation and gender identity as prohibited categories. HUD states, “Discrimination against a lesbian, gay, bisexual, or transgender (LGBT) person may be covered by the Fair Housing Act if it is based on non-conformity with gender stereotypes. For example, if a housing provider refuses to rent to an LGBT person because he believes the person acts in a manner that does not conform to his notion of how a person of a particular sex should act, the person may pursue the matter as a violation of the Fair Housing Act’s prohibition of sex.”<sup>2</sup>

HUD also requires that housing providers that receive HUD funding be subject to HUD’s Equal Access Rule, which requires equal access to HUD programs. In February 2012, HUD released the Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity. Through the final rule, HUD has implemented policy to ensure all HUD programs, including publicly supported housing, were open to all eligible individuals and families regardless of sexual orientation, gender identity or marital status.

Currently, the state of Georgia does not have a law protecting people from discrimination based on sexual orientation or gender identity.

Compared to other protected groups, data for LGBT persons is difficult to collect for several reasons including the difficulty of defining an LGBT person and the parameters of what constitutes an LGBT person. However, the Williams Institute UCLA, a leader in research and publishing LGBT resource, identified same-sex couple households as an important measuring indicator. According to the institute, in 2010, 484 family households were same-sex couple households in Clayton County. This puts the group at 5.34 same-sex couples per every 1,000 households – or one in every 187 households, which is the 12<sup>th</sup> highest for all the counties in the state. While these numbers do not seem significant, housing discrimination is of great

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<sup>2</sup> Ending Housing Discrimination Against LGBT and their Families, [www.hud.gov](http://www.hud.gov), 2016

concern for the LGBT community. Polls conducted by the Williams Institute found that 82 percent of state residents think LGBT persons experience discrimination. Finally, while not a direct comparison, some LGBT persons still experience discrimination in the workplace because of their sexual orientation or gender identity. According to the institute 45 percent of LGBT persons experienced homophobia, transphobia and/or harassment and 25 percent experienced discrimination.

#### Use of Criminal Records by Providers of Housing & Real Estate Transactions

On April 4, 2016 HUD's Office of General Counsel Guidance issued a guidance on the application of Fair Housing Act standards in relation to the use of criminal records by providers of housing and for real estate related transactions. The guidance addresses possible discrimination and disparate methods in Fair Housing cases in which a housing provider may refuse to rent or renew a lease based on an individual's criminal history. According to HUD, nearly one-third of the 100 million U.S. adults have a criminal record of some sort, with many of these individuals having been incarcerated. When these individuals are released from prison or jail, their ability to access safe, secure and affordable housing is critical for their re-entry into the community. Many individuals with criminal records, even those who were convicted but not incarcerated face significant barriers such as discrimination when seeking affordable housing (including publicly supported housing). Blacks and Hispanics are arrested, convicted and incarcerated at rates disproportionate to their share of the general population. HUD concludes: While the Act does not prohibit housing providers from appropriately considering criminal history information when making housing decisions, arbitrary and overbroad criminal history-related bans are likely to lack any legal sufficient justification. Thus, a discriminatory effect resulting from a policy or practice that denies housing to anyone with a prior arrest or any kind of criminal conviction cannot be justified, and therefore such a practice would violate the Fair Housing Act.<sup>3</sup>

#### Individuals with HIV/AIDS and their Families

According to the Center for AIDS Prevention Studies (CAPS) at the University of California San Francisco, one of the world's largest centers in HIV/AIDS research, individuals with the virus face stigma, which often leads to prejudice and discrimination. Much of this HIV/AIDS stigma is caused by misinformation and ongoing ignorance by uneducated persons on the virus. According to the center, stigma exists not only individually, but also across the broader social and cultural contexts, and still requires widespread and significant education efforts to combat it.

In regards to publicly supported housing, individuals with HIV/AIDS and their families are protected under HUD's Equal Access Rule, meaning low-income persons with HIV/AIDS and their families may pursue public housing without discrimination and may be allowed reasonable accommodations for housing options. It is not limited to public housing, as persons with HIV/AIDS are also protected against discrimination in the sale and rental of housing and residential real estate. Furthermore, under the Fair Housing Act and Section 504 of the Rehabilitation Act, persons with HIV/AIDS who may have been discriminated against can file a complaint with the local HUD office. HUD funded public housing and other

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<sup>3</sup> Office of General Counsel Guidance on Application of Fair Housing Act Standards to the Use of Criminal Records by Providers of Housing and Real Estate-Related Transactions, HUD, 2016

HUD funded nonprofit development of low income housing, or recipients of federal financial assistance would be subject to Section 504's non-discrimination requirements.

Currently, the Jonesboro Housing Authority does not have any record of persons with HIV/AIDS participating in their programs. To get a better picture on how this virus has affected the community, the Georgia Department of Public Health Surveillance Fact Sheet in 2014 reports the number of people with HIV/AIDS in the County. Through December 31, 2014, Clayton County had 2,205 known cases of individuals infected with HIV and 1,156 individuals with AIDS. While the total of individuals with HIV/AIDS by race was not broken down by County, it is reported that in the state a disproportionate number of persons with the virus are Black (72.8%). That is a larger representation of the race group than the general population, where according to the 2011-2015 ACS, Blacks made up only 30.9 percent of the state population. As reported earlier, in the County, Blacks make up the majority population in the County and majority portion of residents in public housing (80%) and Section 8 housing (83.8%). As HIV/AIDS has disproportionately affected this community, efforts to inform and reduce stigma for this group must be put forward. (Source: Georgia Department of Public Health, 2014)

**b. The program participant may also describe other information relevant to its assessment of publicly supported housing. Information may include relevant programs, actions, or activities, such as tenant self-sufficiency, place-based investments, or geographic mobility programs.**

#### Jonesboro Housing Authority

The local HUD-recognized PHA in Clayton County is the Jonesboro Housing Authority (JHA). JHA manages one public housing development in the City of Jonesboro and 1,805 HCV units. The mission of the PHA is to assist eligible low-income families with safe, decent, and affordable housing as they strive to achieve self-sufficiency and improve the quality of their lives. JHA works to create and maintain partnerships with clients and appropriate community services in order to accomplish this mission and works to achieve this in a non-discriminatory responsible manner. Currently all waiting lists are closed.

It is the policy of the JHA to fully comply with all Federal, State and local nondiscrimination laws; the ADA; and HUD regulations governing Fair Housing and Equal Opportunity. JHA shall affirmatively further fair housing in the administration of its public housing program. Under the lead of the new director at the JHA, the public housing authority is working towards prioritizing special needs services and public housing for individuals and families with a disability.

JHA also operates a Family Self-Sufficiency Program to help families become economically stable, and therefore be able to meet their needs in finding housing. JHA also manages a homeownership program to help assist families find permanent housing in the area.

#### Housing Authority of Clayton County

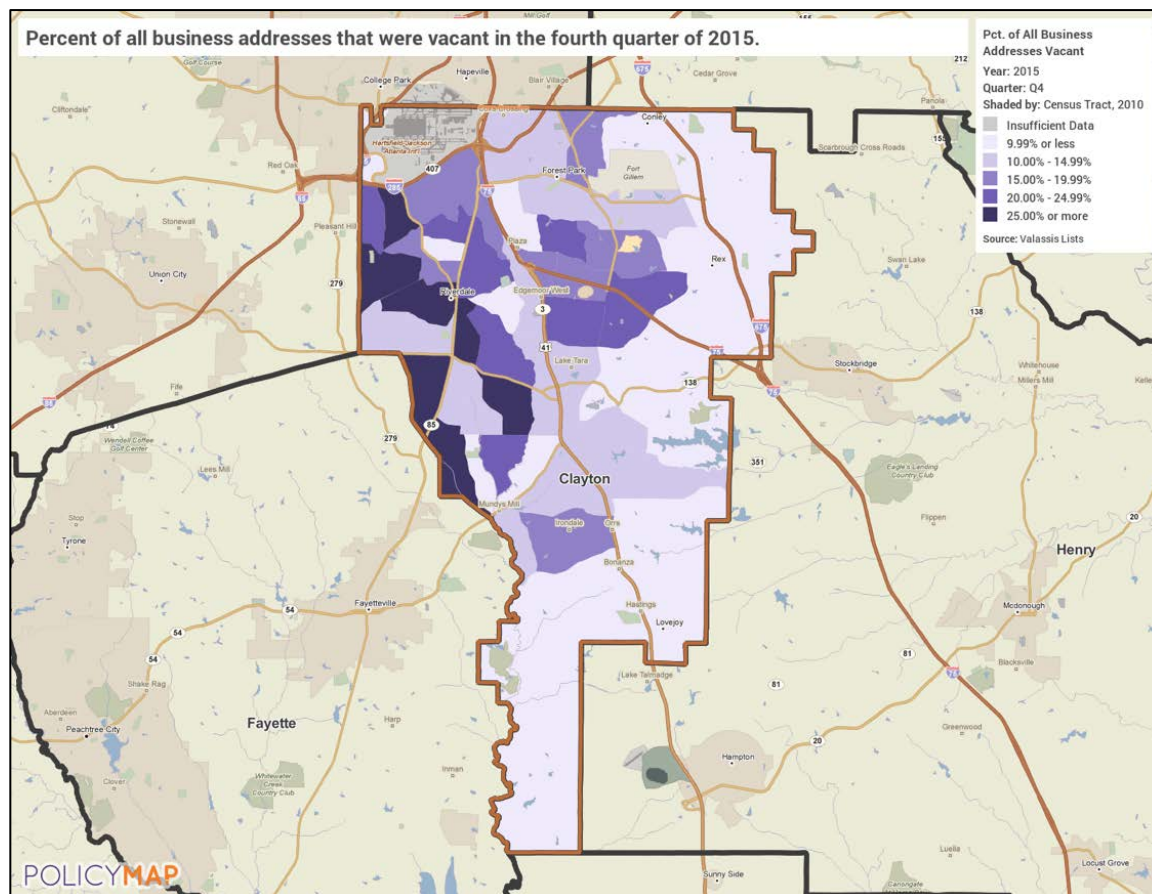
The Housing Authority of Clayton County (HACC) does not administer a HUD public housing program, however HACC was founded by the Clayton County Board of Commissioners in 1982 to provide financing and programs that offer decent, safe and affordable housing to County residents. HACC programs include locally funded rehabilitation and multi- and single-family residences.

#### Lack of Private Investments in Areas with LIHTC Housing

LIHTC is one of the most important resources for creating affordable housing in Clayton County. The LIHTC program gives state and local LIHTC allocating agencies the ability to budget and have authority to issue tax credits for the acquisition, rehabilitation and new construction of rental housing targeted to low income households. The placement of LIHTC sites in coordination to planning that accounts for the economic wellbeing of low-income households is vital for keeping communities out of poverty.

The vast majority of LIHTC housing sites are located in the northwestern region of the County. Even with the international airport on the northwest corner of the County, that area has the highest number of vacant business addresses in the County – especially on the western border. While not the only indicator of a lack of private investment in an area, having large areas where one of out every five business is vacant does not encourage new and existing businesses.

MAP: Business Vacancies



Source: Valassis Lists via PolicyMap 2015



## **2. Contributing Factors-of Publicly Supported Housing Location and Occupancy**

***Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing issues related to publicly supported housing, including Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor that is significant, note which fair housing issue(s) the selected contributing factor relates to.***

- Admissions and occupancy policies and procedures, including preferences in publicly supported housing
- Community opposition
- Displacement of residents due to economic pressures
- Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking
- Impediments to mobility
- Lack of access to opportunity due to high housing costs
- Lack of meaningful language access
- Lack of local or regional cooperation
- Lack of private investment in specific neighborhoods
- Lack of public investment in specific neighborhoods, including services and amenities
- Land use and zoning laws
- Loss of Affordable Housing
- Occupancy codes and restrictions
- Quality of affordable housing information programs
- Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs
- Source of income discrimination
- Other

### ***Admissions and occupancy policies and procedures, including preferences in publicly supported housing***

As noted above, the public housing development in Jonesboro is located in a majority Black community. According to HUD, the housing development in Jonesboro is also predominantly Black (80%), pointing to at least some level of segregation along racial lines. Access to public housing developments is not dependent on race, but because of location or preference, the housing development in Jonesboro is predominantly Black. This is also true for most Project-based Section 8 housing sites in the County.

By contrast, qualified Hispanic households are, by and large, not utilizing publicly supported housing. Based on feedback from focus groups in the community, Hispanic and other race/ethnic households tend to stay out of public housing, instead preferring to double-up or even triple-up (two or more families living together) in a home, and often times in a home of a relative. While Hispanic households represent almost 15 percent of low-income households in the County, there are no Hispanic households using the public housing development in Jonesboro, and no Hispanic households in Other Multifamily housing sites and

the HCV program. Less than one percent of the households using Project-Based Section 8 housing are Hispanic households. Compounding these problems are issues with the citizenship and eligible immigration status requirements of publicly supported housing services. Broadening services to include Hispanic and some other race/ethnic households may require new services and activities. (Data Source: HUD AFH Table 8 – Demographics of Publicly Supported Housing Developments)

### ***Impediments to mobility***

The lack of access to high performing schools creates a barrier to advancement of students in Clayton County, especially the northern areas of the County. Having limited access to high performing schools is a contributing factor to low college education participation rates, and therefore low education attainment. Educational attainment is directly tied to earnings, which is a key part in income mobility.

According to the 2011-2015 ACS, in Clayton County only 18.3 percent of the population 25 has a Bachelor's degree or higher. Statewide, that rate jumps to 28.8 percent. Only 5.2 percent of Clayton County's Hispanic population aged 25 years and older has a Bachelor's degree or higher. As of 2015, persons with a Bachelor's degree in Clayton County earned \$38,188, while persons with only a High school education earned \$25,076 annually. With fewer Hispanics graduating with a Bachelor's degree – likely resulting in lower incomes for individuals and families – disparities in access to opportunities such as jobs and affordable housing will continue to persist.

### ***Lack of Private Investment in Specific Neighborhoods***

There is a disparity in private investment in the northwest and western border area of Clayton County compared to the rest of the County. While not a perfect indicator of a lack in private investment in an area, this part of the County has several areas with 20-25 percent business vacancies in commercial business locations.

### ***Quality of affordable housing information programs and Lack of meaningful language access***

Hispanic households occupy less than 1 percent of publicly supported housing units, but Hispanic households account for 14.9 percent of extremely low-income households and 14.8 percent of low-income households in the County. Asian households (primarily of Vietnamese origin) have similar rates, though not to the same extent as Hispanic households. Despite accounting for 3.3 percent of extremely low-income households and 3.4 percent of low-income households, Asian households use less than 1 percent of publicly supported housing. The County must be proactive in its efforts to open a dialogue with these groups to better understand why publicly supported housing is not benefitting these communities.

## D. Disability and Access Analysis

### 1. Population Profile

#### a. How are persons with disabilities geographically dispersed or concentrated in the jurisdiction and region, including R/ECAPs and other segregated areas identified in previous sections?

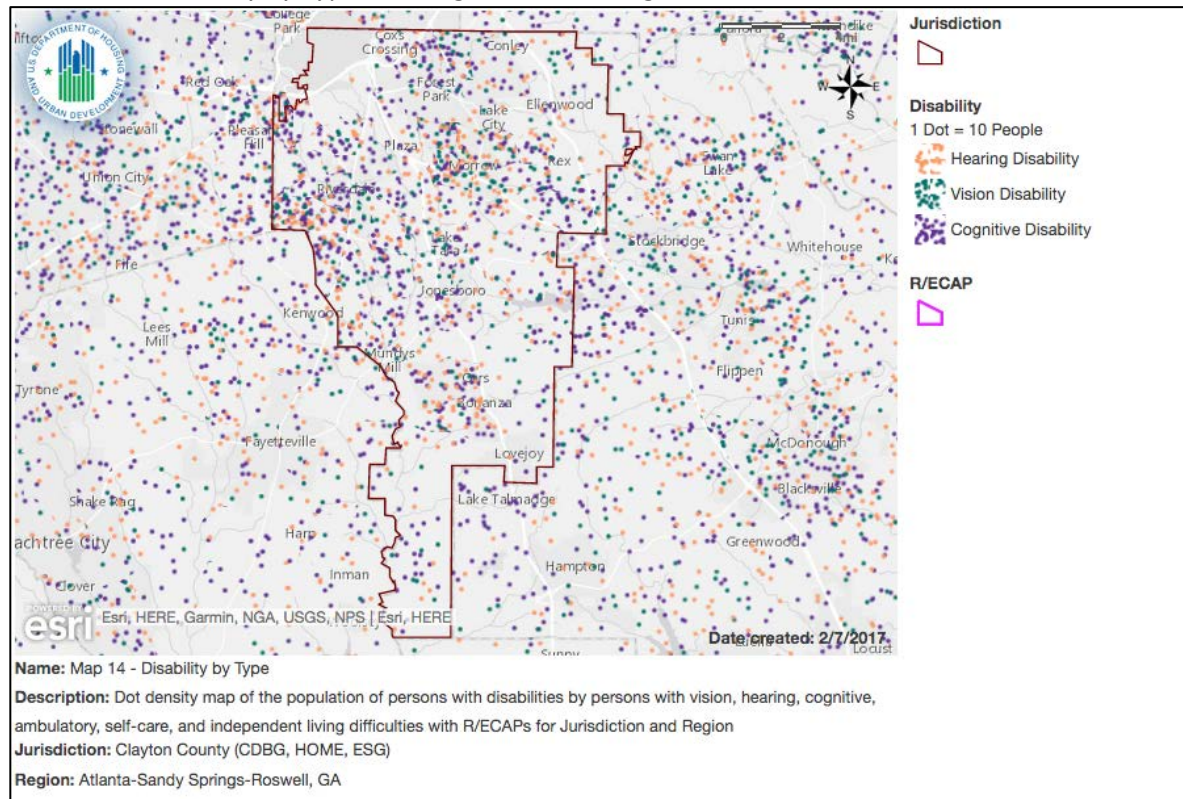
According to the HUD provided table below, six types of disabilities were recorded in Clayton County. The most prevalent was ambulatory difficulty (6.5%), followed by cognitive difficulty (4.7%), hearing difficulty (2.4%), and vision difficulty (2.1%). With the exception of hearing difficulty, estimates for the County were higher in every disability category than in the Atlanta-Sandy Springs-Roswell region.

**Table - Disability by Type**

	(Clayton County, GA CDBG, HOME, ESG) Jurisdiction		(Atlanta-Sandy Springs-Roswell, GA CBSA) Region	
Disability Type	#	%	#	%
Hearing difficulty	5,739	2.43%	124,237	2.51%
Vision difficulty	4,942	2.09%	96,741	1.95%
Cognitive difficulty	11,086	4.70%	195,085	3.94%
Ambulatory difficulty	15,301	6.48%	273,305	5.52%
Self-care difficulty	6,255	2.65%	101,952	2.06%
Independent living difficulty	10,956	4.64%	185,645	3.75%
Note 1: All % represent a share of the total population within the jurisdiction or region.				
Note 2: Data Sources: ACS				
Note 3: Refer to the Data Documentation for details ( <a href="http://www.hudexchange.info">www.hudexchange.info</a> ).				

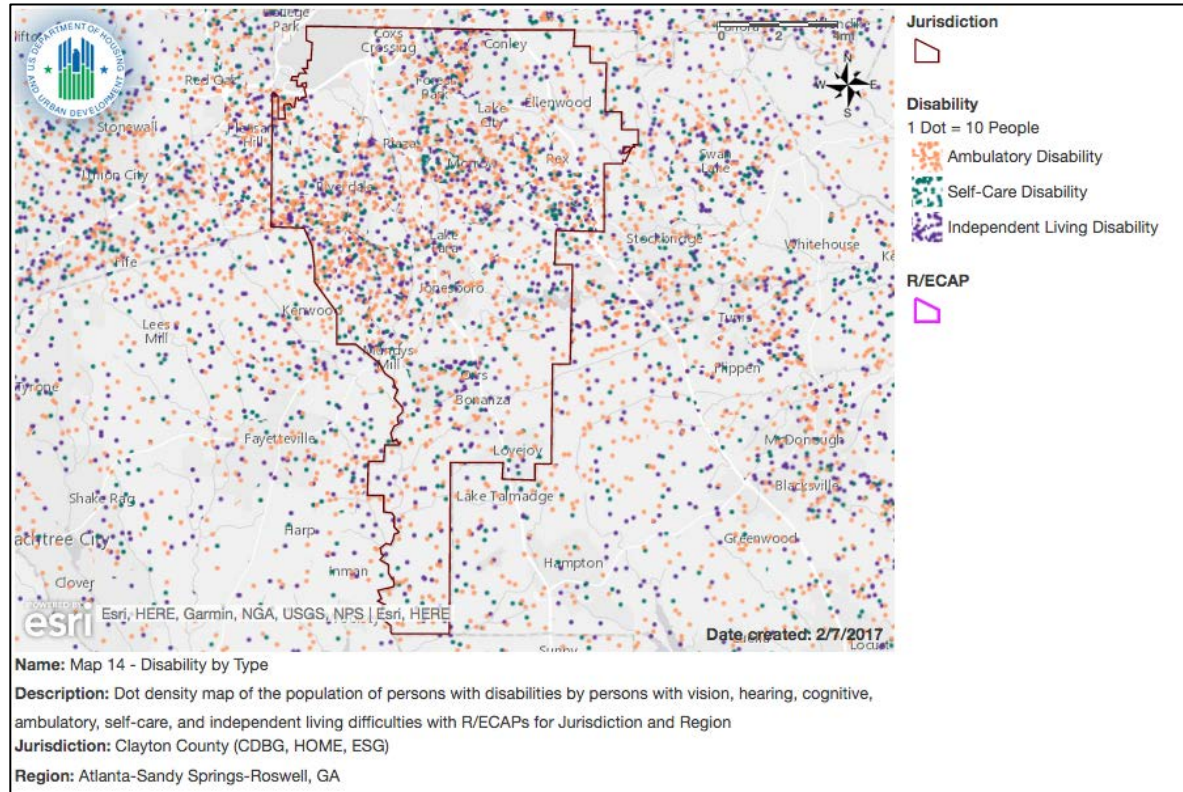
When referenced with the AFH Maps, the western border of the County, areas around I-75 and Morrow, the Irondale/Bonanza area, and (to a lesser extent) the Forest Park area had a higher concentration of persons with hearing, vision and cognitive difficulties.

## HUD MAP – Disability by Type, Hearing, Vision and Cognitive



Those with ambulatory, self-care and independent living difficulty disabilities also showed a high concentration in similar areas.

### HUD MAP – Disability by Type, Ambulatory, Self-Care, and Independent



**b. Describe whether these geographic patterns vary for persons with each type of disability or for persons with disabilities in different age ranges for the jurisdiction and region.**

In general, areas in the northwest border of the County, north along I-75 and the Irondale/Bonanza area have a concentration of persons with disabilities. When the population is broken down by age, the different age groups with disabilities (5-17, 18-64, and 65 and over) are living in different areas.

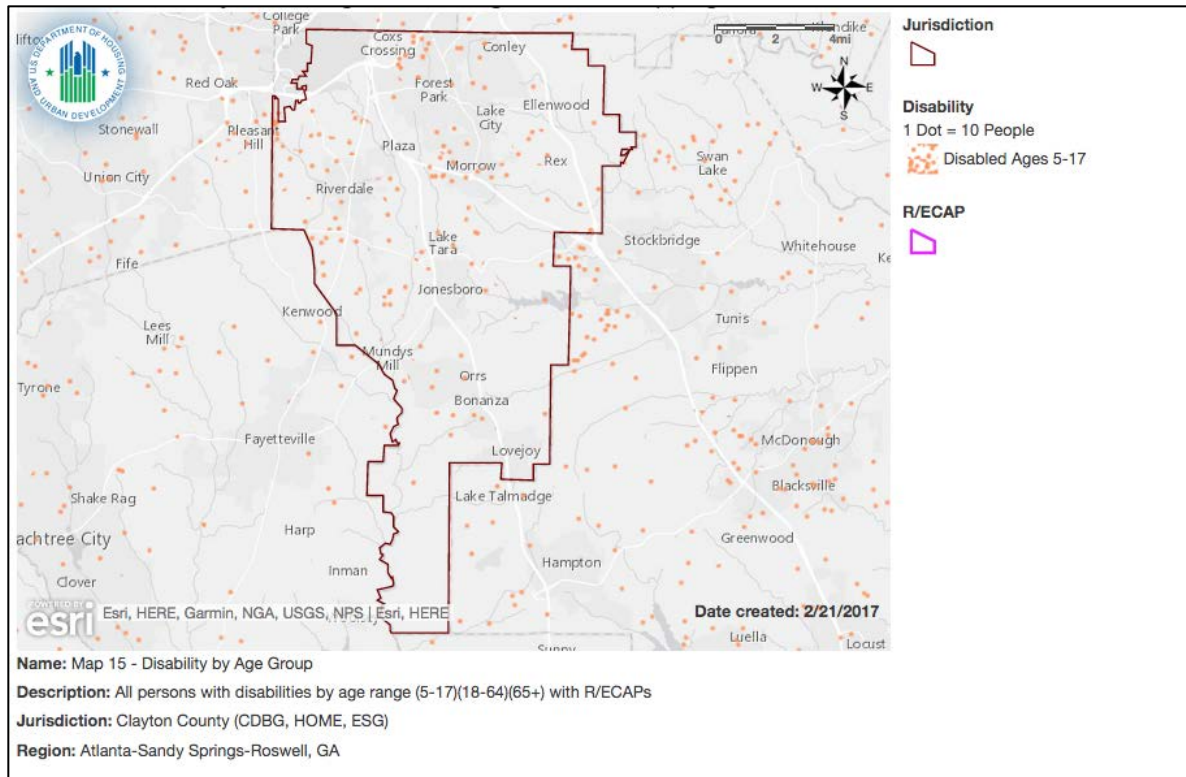
<b>Table - Disability by Age Group</b>				
	<b>(Clayton County, GA CDBG, HOME, ESG) Jurisdiction</b>		<b>(Atlanta-Sandy Springs-Roswell, GA) Region</b>	
<b>Age of People with Disabilities</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
age 5-17 with Disabilities	2,388	1.01%	43,816	0.88%
age 18-64 with Disabilities	17,420	7.38%	285,608	5.77%
age 65+ with Disabilities	7,826	3.31%	177,645	3.59%
Note 1: All % represent a share of the total population within the jurisdiction or region.				
Note 2: Data Sources: ACS				
Note 3: Refer to the Data Documentation for details ( <a href="http://www.hudexchange.info">www.hudexchange.info</a> ).				

**Persons Age 5-17 with Disabilities**

There are 2,388 persons age 5-17 years old in Clayton County with a disability. This makes up 8.6 percent of the disabled population 5 years and over in Clayton County. The group is, for the most part, scattered evenly throughout the County, but there are noticeable clusters northwest of Forest Park and along I-75 by Morrow. Disabled persons age 5-17 are more than likely not living independently, as almost no members of the group are of working age.

*HUD MAP – Disability by Age Group, 5-17 Years*



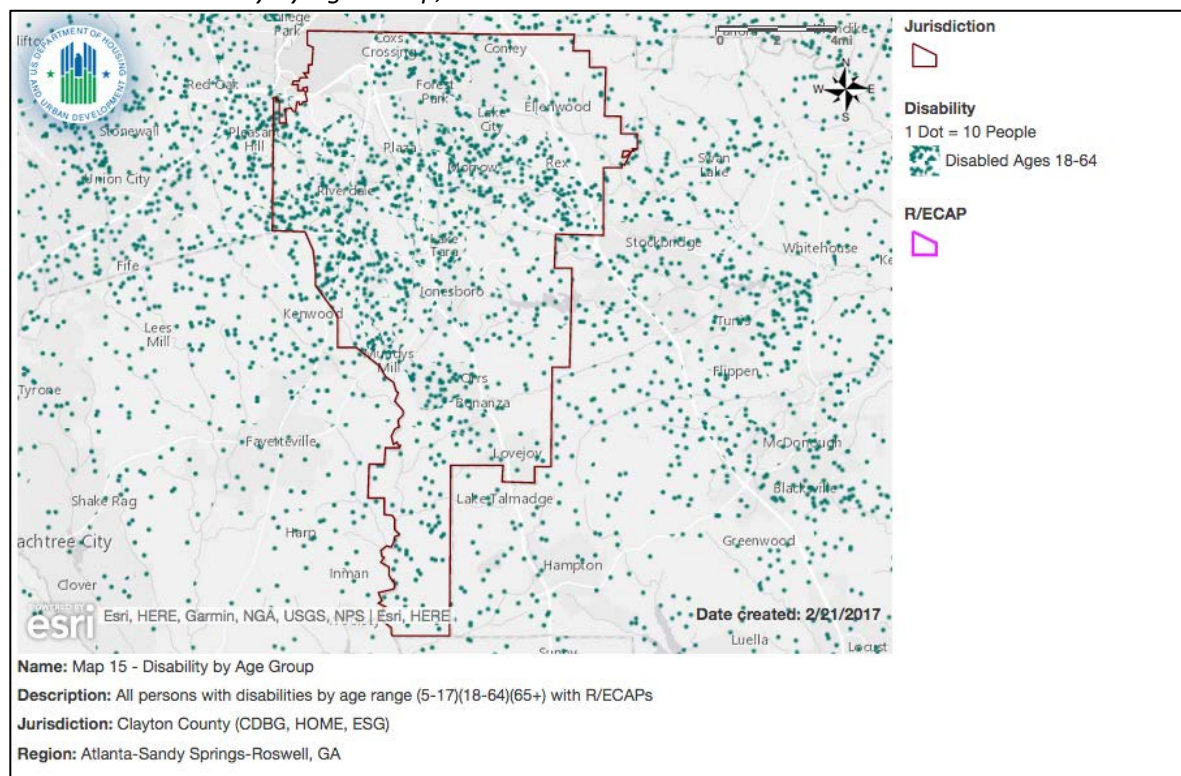




## Persons Age 18-64 with Disabilities

There are 17,420 disabled persons age 18-64 years old in the County, which make up 63 percent of all the disabled population. The bulk of this age group is located in the Forest Park area, along the western border and across to the east of the County along I-75. There is also a cluster of this group in the Irondale/Bonanza area. As this age group is the bulk of the disabled population in the County, its distribution of individuals closely follows the location of the population as a whole.

### *HUD MAP – Disability by Age Group, 18-64 Years*

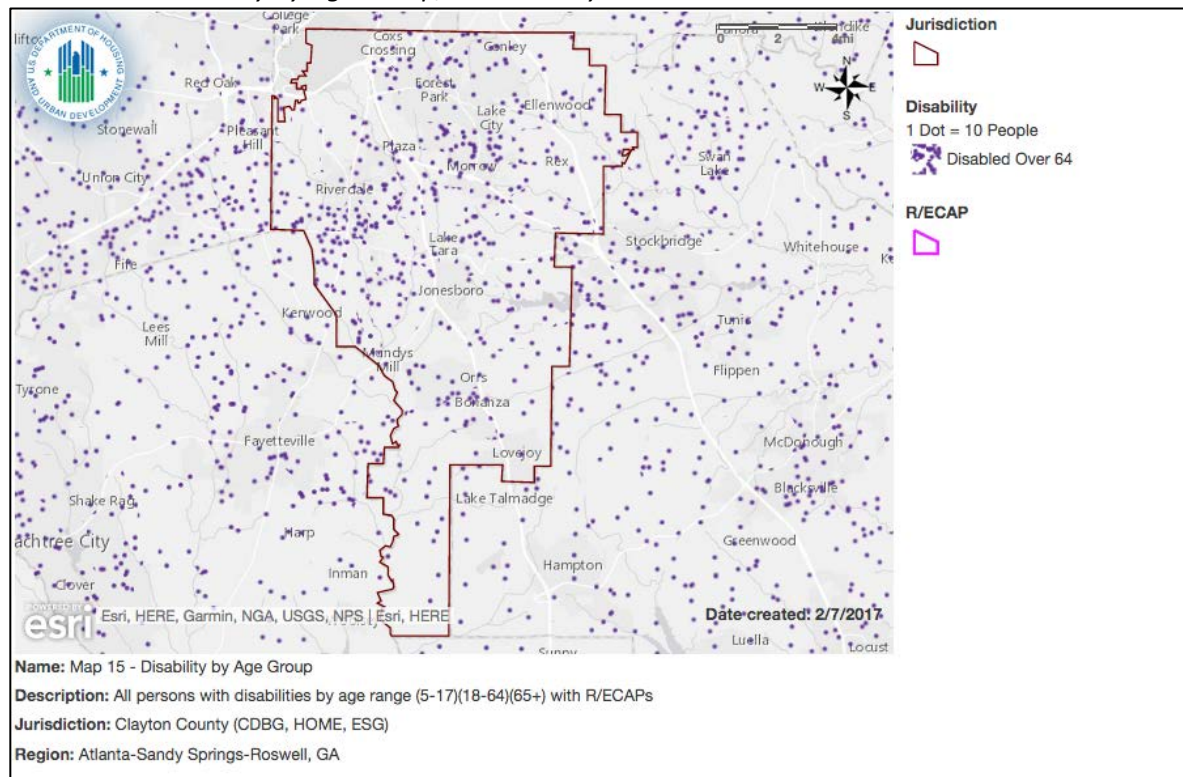


## Persons Age 65+ with Disabilities

Approximately 28.3 percent of the disabled population in the County is 65 years and older (7,826 persons). Disabled elderly were located in similar patterns as the rest of the disabled population.

As people age, some elderly in the population may start to develop unique and special needs to be able to live independently in the community. According to the 2011-2015 ACS, a third of the elderly ages 65-74 years in the County experienced a disability (31.1%) and elderly over 75 years old experienced over half with a disability (53.1%). Those estimates are well above all younger age cohorts.

### *HUD MAP – Disability by Age Group, 64 or more years*



## 2. Housing Accessibility

### a. Describe whether the jurisdiction and region have sufficient affordable, accessible housing in a range of unit sizes.

There is a lack of decent affordable units across the board. From a purely quantitative standpoint, there are ample units in the County to house the population. However, high home values and rents result in much of the housing stock being out of the affordable range for large portions of the population, especially the elderly and disabled. According to the 2011-2015 ACS, 35 percent of homeowners with a mortgage and 59.7 percent of renters are cost burdened (spending more than 30% of income on housing costs), pointing to a major disconnect between the housing supply and residents' income.

**Table - Demographics of Households with Severe Housing Cost Burden**

Households with Severe Housing Cost Burden*	(Clayton County, GA CDBG, HOME, ESG) Jurisdiction		
Race/Ethnicity	# with severe cost burden	# households	% with severe cost burden
White, Non-Hispanic	1,893	14,929	12.68%
Black, Non-Hispanic	13,330	58,230	22.89%
Hispanic	1,959	8,033	24.39%
Asian or Pacific Islander, Non-Hispanic	748	3,382	22.12%
Native American, Non-Hispanic	30	245	12.24%
Other, Non-Hispanic	315	1,142	27.58%
<i>Total</i>	<i>18,275</i>	<i>85,985</i>	<i>21.25%</i>
<b>Household Type and Size</b>			
Family households, <5 people	8,640	44,474	19.43%
Family households, 5+ people	2,401	11,645	20.62%
Non-family households	7,243	29,869	24.25%
Note 1: Severe housing cost burden is defined as greater than 50% of income. Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households. Note 3: The # households is the denominator for the % with problems, and may differ from the # households for the table on severe housing problems. Note 4: Data Sources: CHAS Note 5: Refer to the Data Documentation for details ( <a href="http://www.hudexchange.info">www.hudexchange.info</a> ).			

According to the table above, Demographics of Households with Severe Housing Cost Burden (housing costs greater than 50% of income), more than one out of every five households in the County is severely cost burdened (21.3%). Blacks (22.9%), Asians (22.1%), and Hispanics (24.4%) all had more severely cost burdened households than Whites (12.7%).

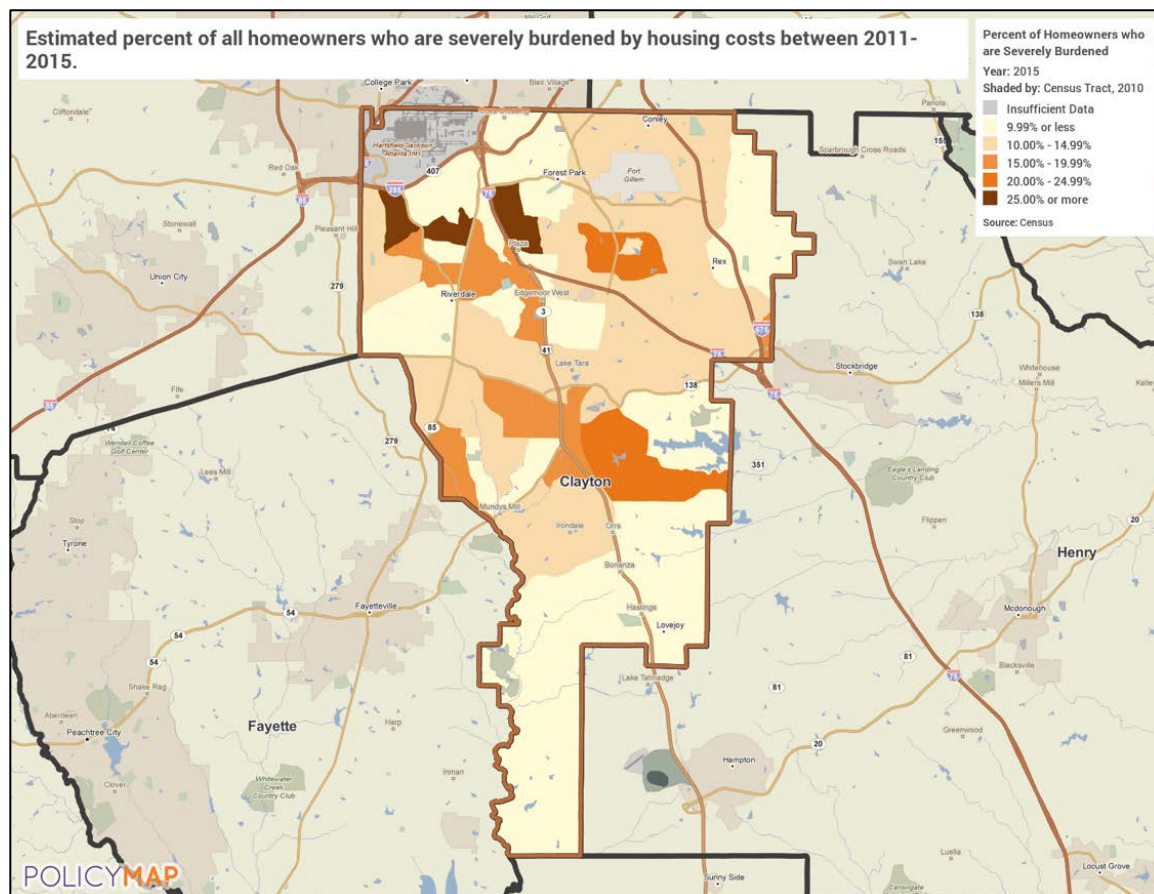
## Location of Severely Cost Burdened Households

### *Severely Cost Burdened Homeowners*

Some areas in the County have one in four or more households that are severely cost burdened. One of these areas is Census tract 13063040306, near Forest Park. The other two locations are just south of Hartsfield-Jackson International Airport: Census tract 13063040204 (Phoenix Blvd/College Park area) and Census tract 13063040520 (Riverdale area). All three of these locations are in northwest Clayton County.

Census tract 13063040306, near Forest Park, is 47.8 percent Hispanic and 34.4 percent Black. Approximately 47 percent of the population in this tract is also living in poverty. Census tract 13063040204 (Phoenix Blvd/College Park area) is 91.8 percent Black, with 30.1 percent of its residents living in poverty, and Census tract 13063040520 (Riverdale area), is 92.3 percent Black with 38.3 percent of its residents living in poverty.

### MAP: Severely Cost Burdened Homeowners



Source: 2011-2015 ACS via PolicyMap

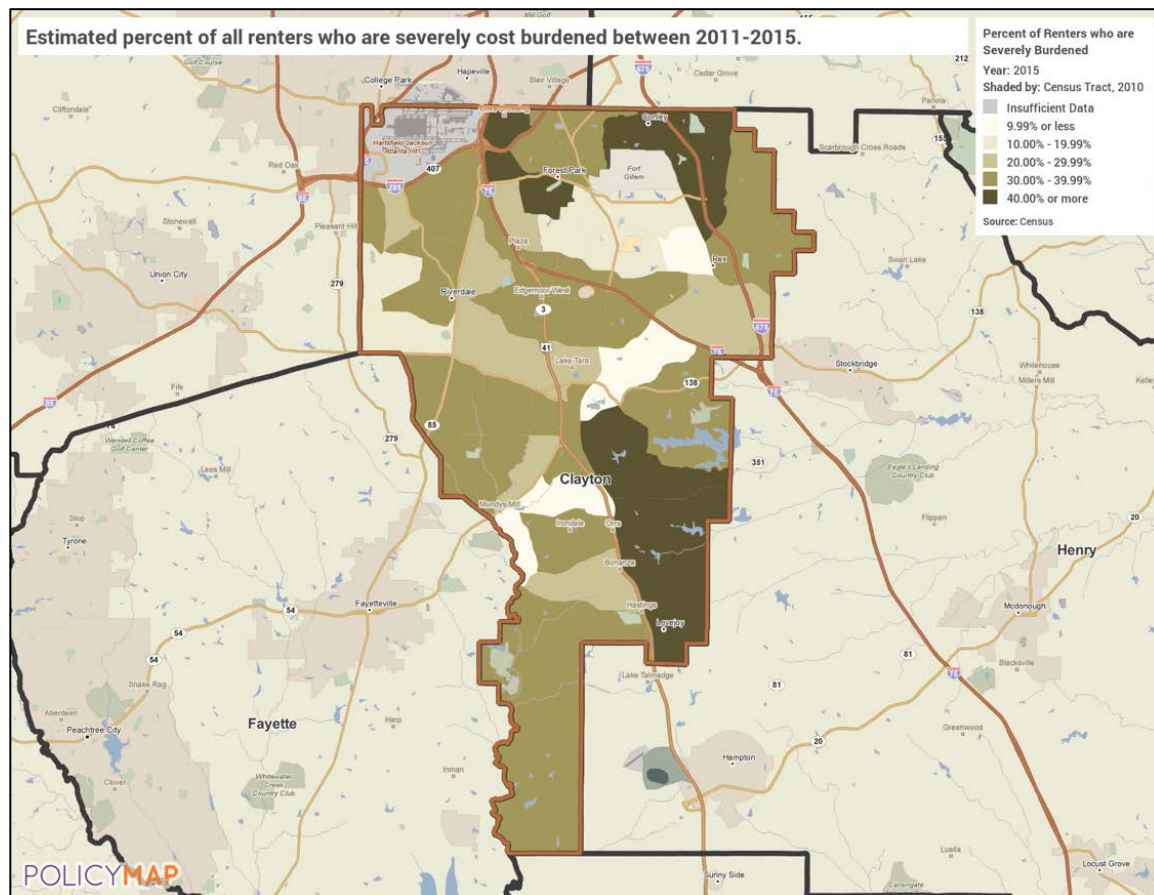
### *Severely Cost Burdened Renter Households*

Renters in Clayton County are more severely cost burdened than homeowners. As shown in the following map, there are four Census tracts with 40 percent or more renter households that are severely cost



burdened: 13063040308 (Forest Park, west), 13063040410 (Fort Gillem/I-675 area), 13063040613 (SE Jonesboro) and 13063040606 (Southeast Clayton County).

#### MAP: Severely Cost Burdened Renters



Source: 2011-2015 ACS via PolicyMap

#### Public Housing Access for Persons with Disability

The Janesboro Housing Authority (JHA) is the local PHA in Clayton County. For disability access in public housing developments, the JHA is in compliance with all section 504 code and ADA regulations as required by a HUD funded PHA. As of 2010, JHA had one public housing development with 32 units in Janesboro and also distributed 1,805 HCVs across the County, however the waiting list for Section 8/HCVs has been closed since October 9, 2015. The JHA has placed 1,200 qualified applicants on the waiting list by random lottery for openings.

The JHA has indicated in its PHA plan that there would be a preference for disabled families, however as the accepted pre applications will be randomly selected, there can be no guarantee for disabled families.

#### Public Housing Condition

The condition of public housing is also critical in determining availability of affordable housing for disabled residents who require assistance in the County. Although inspections may not occur every year, HUD releases physical inspection scores annually for public housing developments across the nation. Below is the inspection score for the JHA's single public housing development.

<b>Jonesboro Housing Authority, PH Development Physical Inspection Score, 2016</b>				
<b>Site</b>	<b>Location</b>	<b>Units</b>	<b>Score</b>	<b>Inspection Date</b>
Jonesboro	213 Hightower St.	32	98	11/20/2014
Source: HUD				

The JHA public housing development is a high performing development unit. HUD Physical Inspection scores are deficiency based, meaning all developments start with 100 points, with each deficiency observed reducing the overall score. They are also weighted by inspection areas: site (15), building exterior (15), building systems (20), common areas (15), and most importantly dwelling units (35). In general, high performing developments will score greater than 90 and troubled developments will score less than 60. (See HUD 77 FR 47708 for detailed computation of physical inspection scores)

Multi-Family Housing sites in Clayton County also receive physical inspection scores.

<b>HUD Multifamily Physical Inspection Scores, 2016</b>			
<b>Site</b>	<b>Property ID</b>	<b>Score</b>	<b>Inspection Date</b>
Rexmill Square 1	800004935	97b	6/25/2013
Riverwood Townhouses 3	800004942	81c	11/5/2015
Riverwood Townhouses 2	800004943	63c	8/17/2016
Riverwood Section 1	800004944	72c	8/19/2016
Keystone Apartments	800005031	63c	11/24/2015
Fieldstone Glen Apartments	800216901	82c	5/14/2015
Source: HUD			
Data Note: Letters (a, b, c) descriptions are: a. No health/safety deficiencies, b. Non-Life Threatening health and safety deficiencies noted, c. At least one Life Threatening health and safety deficiency noted			

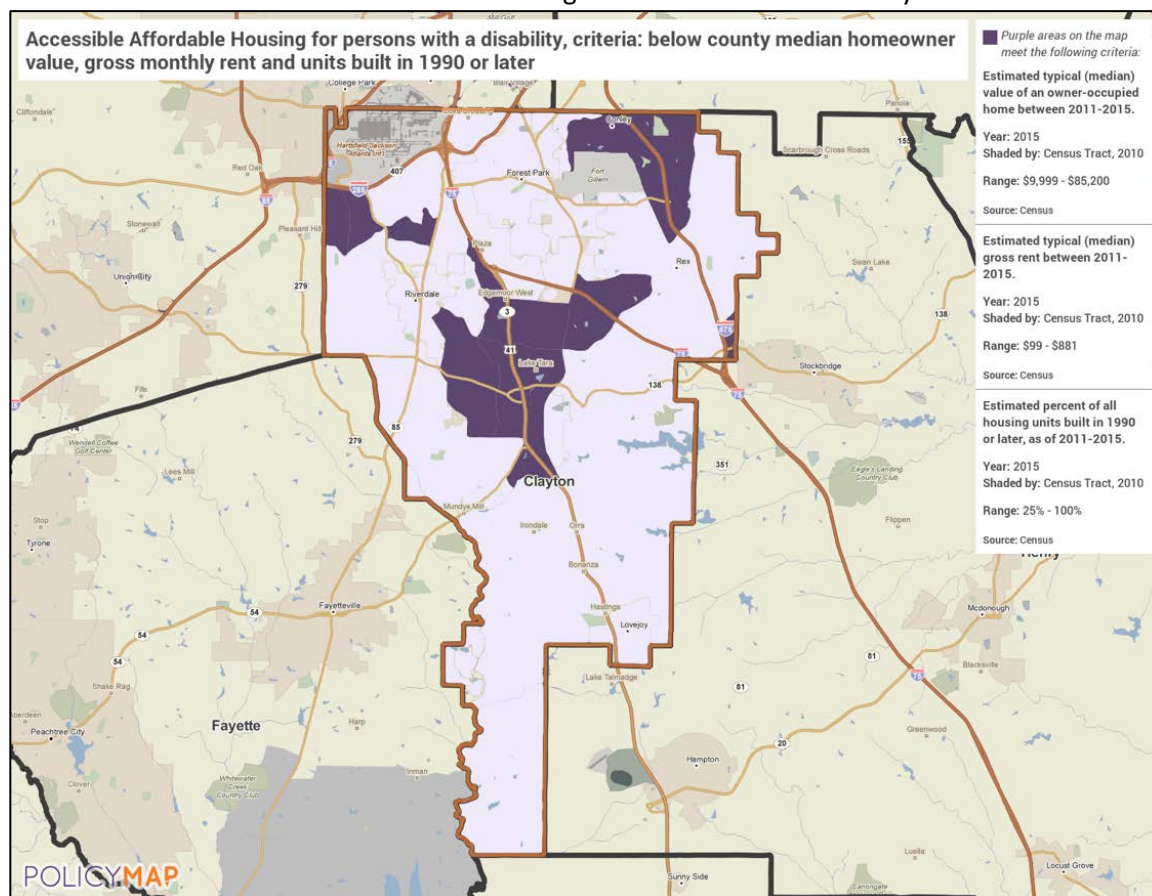
**b. Describe the areas where affordable accessible housing units are located in the jurisdiction and region. Do they align with R/ECAPs or other areas that are segregated?**

Housing for persons with disabilities must be accessible, affordable, and able to accommodate handicaps. Because the Fair Housing Act requires that most multifamily properties built after 1991 meet accessibility standards required by persons with a disability, it is generally accepted that multifamily housing built after this date meet the minimum level of accessibility if built in compliance with federal law. While not a perfect indicator of accessibility, an examination of the age of housing stock and its location can provide a picture of places where there is more or less accessibility.

To get a better picture of this, a combination of age of housing and affordability is used to determine accessibility. For age of housing, areas where 25 percent or more of housing was built after 1990 is deemed to have accessible housing. For affordability, location of housing with value at the median home value or below (\$85,200) and rents at median gross rent and below (\$881) are considered to have accessible housing. The following map provides only areas that meet the criteria of housing built after 1990, homeowner values of \$85,200 and below, and median gross rent of \$881 and below. (Source: 2011-2015 ACS)



## MAP: Location of Accessible Affordable Housing for Persons with a Disability



Source: 2011-2015 ACS via PolicyMap

There are three prominent areas in the County that are accessible and affordable for persons with a disability, according to the criteria as described above: the center of Clayton County in the surrounding Jonesboro area and up US-41, south of the international airport along I-285, and northwest of Fort Gillem along I-675.

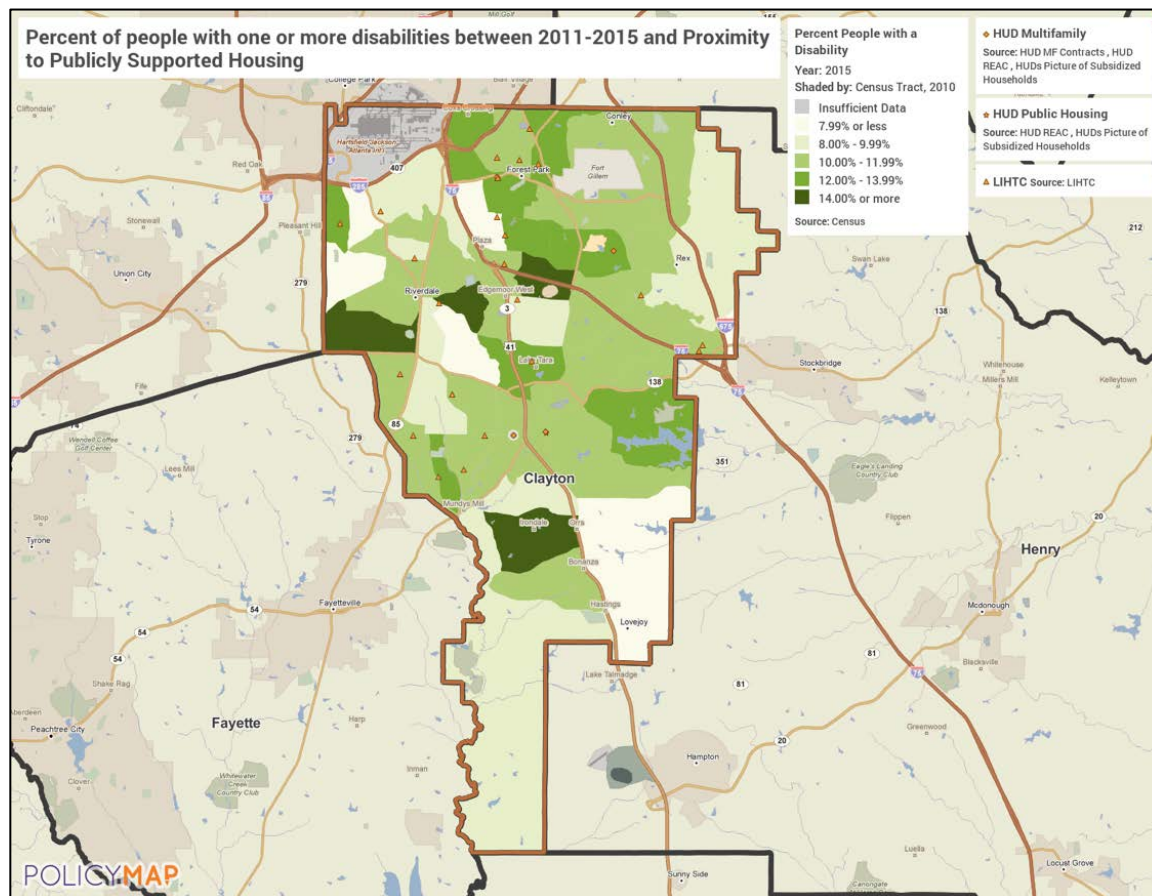
One example is tract 13063040417 (north of Jonesboro). This tract has a median home value below the County median at \$64,100, a median gross rent that is slightly below the County average at \$879, and 38.7 percent of the homes built after 1990.

As the County has a population with a Black majority, it is natural that these areas are also predominately Black, but the area northeast of Fort Gillem also has a concentration of persons who identify as Hispanic (27.6%). (Source: 2011-2015 ACS via PolicyMap)

### Accessible Publicly Supported Housing for Persons with a Disability

LIHTC housing has by far the most numerous sites, most of which are located in the northwestern half the County. According to MAP – Race/Ethnicity, this is also where the highest number of Blacks resides in the County. HUD Multifamily units were located across the County and did not display any patterns where there was a concentration in any race (other than Blacks, which were the majority of the general population). The lone public housing development in the County was located in Jonesboro.

MAP: People with Disabilities and Proximity to Publicly Supported Housing



Source: 2011-2015 ACS, HUD, LIHTC via PolicyMap

None of the three types of publicly supported housing units are located with any prominence in areas where there is a high percentage of people with disabilities. There were 4 households with a disability in the public housing development in Jonesboro (13.3% of residents). Project-based Section 8 (6.3%) had fewer residents who were disabled, and none of the residents in Other Multifamily units were reported as disabled. See following table.

Table - Disability by Publicly Supported Housing Program Category	
(Clayton County, GA CDBG, HOME, ESG)	
Jurisdiction	People with a Disability

	#	%
Public Housing	4	13.33%
Project-Based Section 8	36	6.26%
Other Multifamily	0	0.00%
HCV Program	306	14.31%
<b>(Atlanta-Sandy Springs-Roswell, GA) Region</b>		
Public Housing	1,721	31.27%
Project-Based Section 8	951	9.18%
Other Multifamily	83	4.85%
HCV Program	6,469	17.63%
Note 1: The definition of "disability" used by the Census Bureau may not be comparable to reporting requirements under HUD programs.		
Note 2: Data Sources: ACS		
Note 3: Refer to the Data Documentation for details ( <a href="http://www.hudexchange.info">www.hudexchange.info</a> ).		

The HCV program (14.3%) showed more residents who were disabled than the other housing categories, but voucher applicants having the ability to seek their own housing can partly explain this.

**c. To what extent are persons with different disabilities able to access and live in the different categories of publicly supported housing in the jurisdiction and region?**

The Jonesboro Housing Authority (JHA) is a HUD recognized and funded public housing authority. All HUD funded programs and projects are required to conform to the ADA and be Section 504 compliant.

JHA lists on its PHA plan that it will make a reasonable effort to identify the housing needs of low-income families that reside in Clayton County, and that preference will be given to disabled families on the waiting list. However, while the County and JHA promote and make reasonable accommodations for all persons with a disability, due to the wide range of accommodations (such as ramps for children with mobility issues or children with autism living in an apartment with reduced noise), the County and PHA have difficulty meeting the needs of all people with disabilities.

**3. Integration of Persons with Disabilities Living in Institutions and Other Segregated Settings**

**a. To what extent do persons with disabilities in or from the jurisdiction or region reside in segregated or integrated settings?**

In 1991 the U.S. Department of Justice defined “the most integrated setting appropriate to the needs of qualified individuals with disabilities” as “a setting that enables individuals with disabilities to interact with nondisabled persons to the fullest extent possible.”<sup>4</sup> In 2011, they further reinforced this with a statement:

...those that provide individuals with disabilities opportunities to live, work, and receive services in the greater community, like individuals without disabilities. Integrated settings are

<sup>4</sup> 56 Fed. Reg. 35694 (1992), codified at 28 C.F.R. pt. 35, app. B.

located in mainstream society; offer access to community activities and opportunities at times, frequencies and with persons of an individual's choosing; afford individuals choice in their daily life activities; and provide individuals with disabilities the opportunity to interact with non-disabled persons to the fullest extent possible.<sup>5</sup>

Two factors immediately influence the ability to integrate the settings of persons with a disability: where the individual lives and how the individual will travel to places. Unfortunately, deciding where to live for individuals with a disability is often a complicated process with several layers of considerations, which can lead to less affordability and accessibility. HUD MAP 17 – Disability shows the majority of disabled persons in Clayton County live in the northwest part of the County, from Riverdale to Morrow and up to Forest Park. This area also has a wealth of restaurants, parks and shopping centers. Southlake Mall is also located nearby in Morrow on I-75. Traveling to these destinations remains an issue in the County.

In 2015, Clayton County has 28,855 persons with a disability – 10.9 percent of the population. As the population in Clayton County is predominantly Black, there are no specific segregated communities with disabled persons. (Source: 2011-2015 ACS)

**b. Describe the range of options for persons with disabilities to access affordable housing and supportive services in the jurisdiction and region.**

Affordable Housing for Persons with a Disability

Eligible persons with a disability have access to publicly supported housing in Clayton County through its PHAs. According to the HUD provided data, approximately 13.3 percent of residents using public housing have a disability. Four persons reside in the public housing development located in Jonesboro, which is managed by the JHA. As a federally funded housing authority, JHA makes access to public housing, programs and activities available to all protected classes, including persons who are disabled.

The HCV programs in the County house 306 persons with disabilities (14.3%), Project-based Section 8 has 36 persons (6.3%) and Other HUD Multifamily sites reported none. See table Disability by Publicly Supported Housing Program Category above.

Supportive Services for Persons with a Disability

There are a number of organizations and local agencies that provide support and services for persons with disabilities. Below is a list of these agencies and a summary of what their services are:

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<sup>5</sup> Statement of the Department of Justice on Enforcement of the Integration Mandate of Title II of the Americans with Disabilities Act and Olmstead v. L.C. (DOJ Olmstead Statement), [http://www.ada.gov/olmstead/q&a\\_olmstead.htm](http://www.ada.gov/olmstead/q&a_olmstead.htm). The Department of Justice is the agency charged with coordination of Section 504 and Title II of the ADA.

Parent to Parent of Georgia (P2P) is a primary resource and network organization in the County and the state of Georgia. Beyond networking and referral, P2P also provides support groups, education and training programs for parents and technical assistance.

The Georgia Council on Developmental Disabilities (GCDD) is a federally funded independent state agency that promotes and creates opportunities that enable persons with disabilities to live independently as an integral part of the community. GCDD accomplishes this through three primary areas of focus: public policy, advocacy and program funding and implementation. Through collaboration with citizens, policymakers, public and private advocacy organizations, GCDD works to promote increased independence, inclusion, integration, productivity and self-determination for persons with developmental disabilities.

disABILITY LINK (dLINK) is a nonprofit organization that provides advocacy, independent living skills, information and referral, peer counseling and transition services for disabled persons. As part of these services, dLINK provides comprehensive and up-to-date information and available resources about housing as well as for disabled persons.

Bobby Dodd Institute (BDI) empowers people with disabilities and disadvantages to maximize their potential by securing economic self-sufficiency, independence and integration into the community. For this purpose BDI provides job training and employment services, business services for creating jobs for people with disabilities, and staffing services.

Community Care & Source Programs (CCSP) helps elderly and disabled persons to continue living independently in their homes and communities.

The Georgia Advocacy Office (GAO) provides protection and advocacy for persons with a disability and mental illness.

Developmental Services at the Bradford-Williams Center (DSBWC) provides comprehensive programs for adults and children who have cognitive or developmental disabilities and for infants who are at risk for developmental problems.

Work Training and Employment Center (WTEC) provides vocational training and job placement for persons with disabilities and an alternate education program for Clayton County Public Schools high school students with behavior disorders and other disabilities.

Goodwill Industries (GW) provides employment and training programs available for persons with disabilities.

#### **4. Disparities in Access to Opportunity**

**a. To what extent are persons with disabilities able to access the following in the jurisdiction and region? Identify major barriers faced concerning:**

**i. Government services and facilities**

Access to Government Services and Employment

Clayton County complies with ADA policy and regularly gives notice that the County will not discriminate against qualified individuals with disabilities in the County's services, programs or activities. Furthermore, the Clayton County government does not discriminate on the basis of any class or characteristic protected by law.

The County is an Equal Opportunity Employer and supports a policy of nondiscrimination with employees and applicants for employment. In compliance with the ADA, the County will provide reasonable accommodations to qualified individuals with disabilities and encourages both prospective and current employees to discuss potential accommodations with the County. The County also states that no part of employment within the County will be influenced by any basis protected by federal law, including persons who are disabled.

The County also does not discriminate against any company or group of companies in its contracting and procurement activities on the basis of protected characteristics set by Federal law including disability.

Government Facilities

Clayton County makes efforts to be ADA compliant in its facilities and will make reasonable accommodations for persons with a disability.

As for the Clayton County Parks and Recreation facilities, the County works to ensure ADA compliance. If any person with a disability or any parent/guardian of a minor with a disability believes they have been discriminated against on the basis of their disability (denial of access to facilities, programs and services) they may file a grievance within 30 days to the Office of the Director of the Clayton County Parks and Recreation Department at 2300 Hwy. 138 SE in Jonesboro.

**ii. Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)**

Sidewalks in Clayton County are constructed in accordance with the Georgia Department of Transportation's (GDOT) land disturbance and right-of-way construction guidelines. GDOT is ADA compliant. As of 2014 technical guidelines state that alterations to existing streets and walkways require curb ramps for wheelchair access at the time of construction or improvement.

**iii. Transportation**

MARTA is the County's public transportation system, with connections for train and bus transit. While transit to Atlanta is a high priority for commuters, MARTA also partners with other transit system in the region, making travel possible for Clayton County residents into other areas in the region.

For riders with special needs, MARTA Mobility (MM) is the County's service that provides ADA Complementary Paratransit service and makes public transit equally accessible for eligible individuals whose disabilities prevent them from getting to and from fixed route services or riding fixed route services. Riders must have a MARTA Mobility Photo ID Breeze Card to be able to request and board MM buses. MM is a shared ride with advance reservation required. MM buses operate in an ADA-designated service area within Fulton, DeKalb and Clayton Counties and the City of Atlanta along a 3/4-mile corridor located on each side of all fixed bus routes and in a 3/4-mile radius of each station. Finally, MM riders are part of the reduced fare program.

The Clayton County Community Services Authority (CCCSA) offers transportation services with a special emphasis placed on the needs of people with disabilities and the elderly in the County. Transportation services coordinated by CCCSA are offered through program participation in one of the many programs offered through the County, including as the Day Care Program, Temporary Assistance for Needy Families Program, the Department of Labor-Vocational Rehabilitation Program, Clayton County Alzheimer's Support Services and recipients of the Meals-On-Wheels program. All passenger vehicles are designed to accommodate passengers with disabilities, have wheelchair lift equipment, and are radio equipped.

#### **iv. Proficient schools and educational programs**

Students with disabilities in Clayton County have access to the public school system through the Special Education program. The Clayton County Public School District does not discriminate on the basis of an individual's handicap or disability. In partnership with general education of the Clayton County School District, the Department of Exceptional Students (DES) seeks to provide services for students with disabilities that facilitate an educational progression. These services support the school's goals and are delivered through a variety of models. The Individual Education Program (IEP) specifies educational placement and programs for students through ongoing services. DES collaborates with community service providers to provide optimal opportunities for students in Clayton County.

Clayton County students with disabilities benefit from a variety of learning opportunities. The general education curriculum is followed when possible, and modifications to curricula are made to meet individual needs. Alternative curricula are designed to meet the needs of students who require different options.

Special instruction is provided for students who qualify in one or more of the following areas: autism, emotional behavior disorders, hearing impairments, intellectual disabilities, orthopedic impairments, other health impairments, significant developmental delays, specific learning disabilities, speech-language impairments, traumatic brain injuries, visual impairments, assistive technology, family liaison programming, and preschool special education.

Special education students may also receive related services in the areas of transportation, occupational therapy and physical therapy, music therapy, audiology, orientation and mobility, interpreter services, vocational instruction, adaptive physical education and assistive technology.



Clayton County special education students benefit from a wide variety of instructional opportunities. Regular curriculum is followed when possible and modifications to curriculum are made to meet individual needs. Again, alternative curricula are designed to meet the needs of students who require different options.

In the case of an event where parents or student believe they have been discriminated against, the school district has a comprehensive complaints and grievance procedure. For a full guide or to make a complaint, parents or disabled persons can contact the office of the Director of Student Services at (770) 473-2700 located at 1058 Fifth Ave. in Jonesboro.<sup>6</sup>

(Source: Clayton County Public Schools Special Education Program)

## **v. Jobs**

Of the 26,880 persons of working age (16 years and older) who were disabled in Clayton County 21.9 percent (5,875) were employed.

When compared to the percentages of disabled persons employed in a certain Industry as compared to non-disabled persons in the County, there were more persons with a disability employed in Retail Trade, Professional, scientific, and management, and administrative and waste management services, and Educational services, and health care and social assistance. There were less persons who were disabled working in Construction, manufacturing, and Transportation and warehousing, and utilities.

In a comparison on occupations, persons who have a disability were more likely to be in management, business, science and arts as compared to persons without a disability and less likely to be in Natural resources, construction, and maintenance occupations and Production, transportation, and material moving occupations. (Source: 2010-2014 ACS, S1811)

### Employment at the County Government

Clayton County does not discriminate on the basis of any class or characteristic protected by law, which includes persons with a disability who may be seeking a job. The County is an equal opportunity employer and maintains a policy of nondiscrimination with respect to its employees and applicants applying for employment. All employment and hiring decisions are made without regard to race, color, age, sex, religion, national origin, and disability. In the event that any employee or applicant requires an accommodation in order to perform their job, the Human Resources department can be contacted.

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<sup>6</sup> Clayton County Public Schools, Special Education, <http://www.clayton.k12.ga.us>, 2017

**b. Describe the processes that exist in the jurisdiction and region for persons with disabilities to request and obtain reasonable accommodations and accessibility modifications to address the barriers discussed above.**

Clayton County is in full compliance with the Americans with Disabilities Act (ADA). The County does not discriminate on the basis of disability in employment and hiring and its programs or activities, nor does it tolerate harassment such as offensive language, jokes, physical or verbal abuse, written or pictorial related to any of the protected characteristics by law including disabilities.

Employment

Clayton County is an Equal Opportunity Employer. As per County employment guidelines listed on job application notices, if in the event that any candidate or employee requires an accommodation in order to perform his or her job, Human Resources can be contacted to provide reasonable accommodations for qualified individuals with disabilities and encourages both prospective and current employees to discuss potential accommodations with the County.

The Clayton County Human Resources staff is qualified to resolve issues in a wide range of employment and labor laws including equal opportunity, affirmative action, discrimination, harassment, disabilities, medical claims, and more. They work with managers and employees to ensure the County's decisions and actions are within established legal boundaries and represent the County in administrative claims and appeals.

Accommodations for hiring and resolving employment issues, and also complaints and grievances can be made through the County HR website or by phone: (770) 477-3239.

Citizens Seeking Accommodations

*General County Activities and Programs:* At this time, citizens seeking accommodations can contact the County Human Resource department for general County activities and programs. Reasonable accommodations are granted for qualified individuals who are disabled. Those that need assistance to participate in public meetings may do so by contacting Human Resources in advance of the meeting to ensure their disability can be accommodated.

Accommodations for programs and activities conducted by the County and also complaints and grievances can be made through the County HR website or by phone: (770) 477-3239.

*Clayton County Parks and Recreation (CCPR):* The CCPR is ADA compliant and strives to make its parks and recreation areas accessible to all persons including persons with a disability. However, in the event any person with a disability or any parent/ guardian of a person with a disability believes that they have been a victim of discrimination on the basis of denial of access to facilities, programs or services due to their disability, may file a grievance. This process will be utilized to protect the rights of disabled persons, and to ensure that the Clayton County Parks and Recreation Department complies with the American with Disabilities Act and implementing regulations. The complaint should be submitted within at least 30

calendar days after the alleged incident to: The Office of the Director at the Clayton County Department of Parks and Recreation at 2300 Hwy. 138 SE. in Jonesboro.

**c. Describe any difficulties in achieving homeownership experienced by persons with disabilities and by persons with different types of disabilities in the jurisdiction and region.**

Persons with a disability in Clayton County face the added difficulty of purchasing homes that must often be brought up to applicable County or ADA codes, which will likely add to the cost of purchasing or owning a home. According to the 2011-2015 ACS, for working individuals, persons with a disability make almost 17 percent less than a person without a disability (\$21,168 median income versus \$25,524). Approximately 35 percent of homeowners with a mortgage in the County are already cost burdened, and this cost burden generally increases as median income decreases. Due to the reasons of finding homes that can accommodate for persons with disabilities and the general lack of affordability, persons with a disability have more limited options for homeownership in the County than non-disabled persons. (Source: 2011-2015 ACS 5-Year Estimates DP04, S1811)

For the disabled population, there are 10,956 persons with an Independent living difficulty, 6,255 with Self-care difficulty and 15,301 persons with ambulatory difficulty. There are 5,739 with hearing difficulty, 4,942 with vision difficulty and 11,086 with cognitive difficulty. While these numbers overlap because an individual may have one or more difficulty, and not all persons with a disability may be seeing homeownership, it gives us a picture of the amount of homes that may require accommodations in the County. See table Disability by Type in the following section.

## 5. Disproportionate Housing Needs

### a. Describe any disproportionate housing needs experienced by persons with disabilities and by persons with certain types of disabilities in the jurisdiction and region.

The County recognizes the importance to respond to the critical needs of disabled individuals to promote self-sufficiency and independent living opportunities. To examine this issue, an estimate of the number of persons by disability type is an important indicator in determining housing needs. The table below displays the number of persons in the County by disability type.

**Table - Disability by Type**

	<b>(Clayton County, GA CDBG, HOME, ESG) Jurisdiction</b>	
<b>Disability Type</b>	<b>#</b>	<b>%</b>
Hearing difficulty	5,739	2.43%
Vision difficulty	4,942	2.09%
Cognitive difficulty	11,086	4.70%
Ambulatory difficulty	15,301	6.48%
Self-care difficulty	6,255	2.65%
Independent living difficulty	10,956	4.64%
Note 1: All % represent a share of the total population within the jurisdiction or region.		
Note 2: Data Sources: ACS		
Note 3: Refer to the Data documentation for details ( <a href="http://www.hudexchange.info">www.hudexchange.info</a> )		

Disabled persons with an ambulatory difficulty are highest with 6.5 percent, followed by disabled persons with a cognitive difficulty with 4.7%, and then 4.6% are with independent living difficulty. There are also 2.7% with self-care difficulty, and 2.1% with vision difficulty that would likely require accommodations to allow these persons to live independently or with family in homes.

Furthermore, of the population 16 years and over, only 21.9% of the disabled that are employed – 5,875 persons. Those employed with any disability had an estimated median earnings of \$21,168, which was lower than those with no disability with \$25,524 – a difference of 17% less. Approximately 35% of homeowners with a mortgage in the County are housing cost burdened (meaning 30% or more of their income go towards housing costs). With disabled workers earning less than persons with no disability, finding affordable housing that is suitable for their needs becomes pertinent. (Data Source: 2011-2015 ACS)

## 6. Additional Information

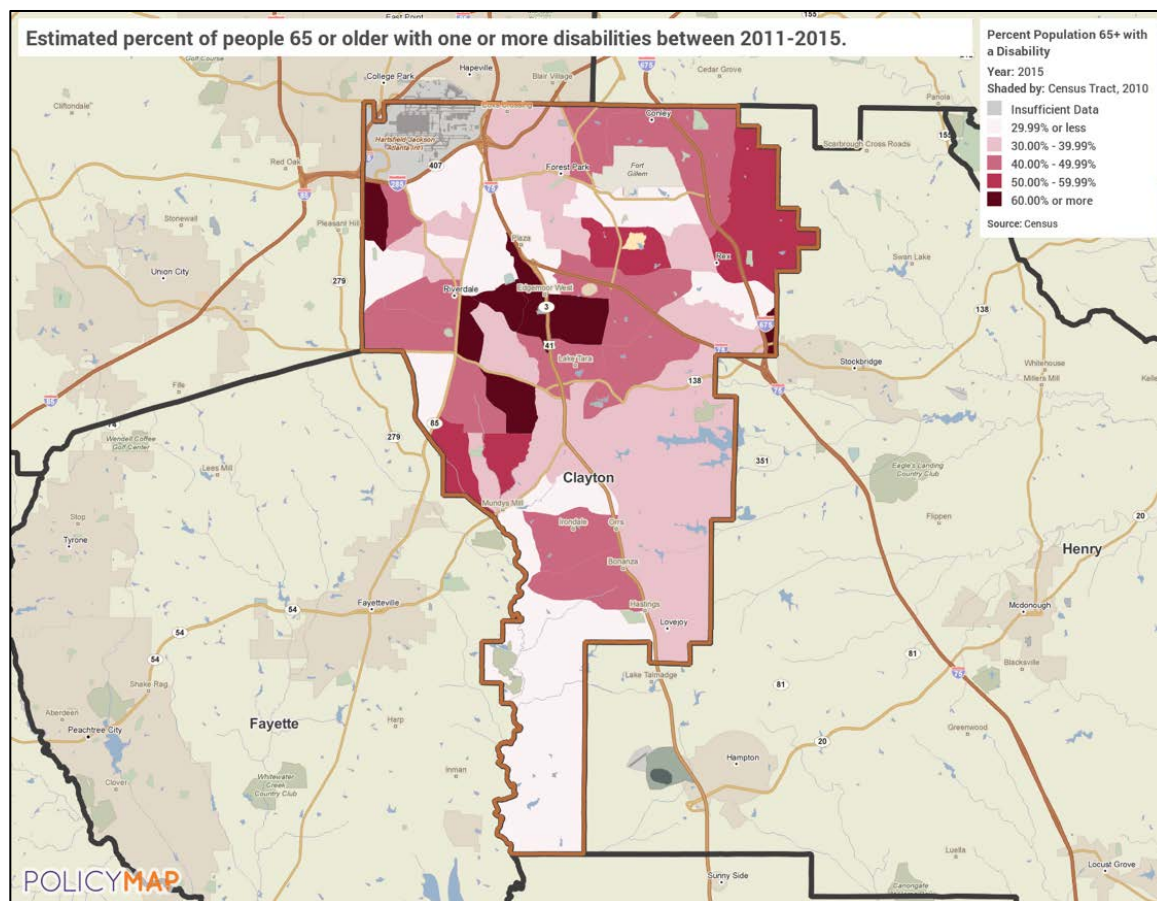
a. Beyond the HUD-provided data, provide additional relevant information, if any, about disability and access issues in the jurisdiction and region including those affecting persons with disabilities with other protected characteristics.

Disabled persons experience access issues in Clayton County, as is evidenced by the multitude of services offered to bridge gaps as mentioned in this assessment. When disabled persons are also elderly it brings forth a convergence of issues that must be addressed for them to continue to live independently or with family in the community.

### Elderly and Disability Access

Elderly 65 years and over experience a disability rate much higher than the general population county-wide rate of disabled persons (10.9%). Approximately 33.1 percent of elderly 65 to 74 years old were with a disability and elderly 75 years and over experienced 53.1 percent with a disability – both much higher than the countywide rate. (2011-2015 ACS - S1810)

MAP: Population 65 Years and Older with a Disability



Source: 2011-2015 ACS via PolicyMap

Elderly 65 years and over with a disability are found in higher concentrations in central areas of the County between Riverdale and Morrow. Other areas where concentrations of elderly with a disability are high in the County are the northwest border near the international airport and I-285, and where I-675 exits the eastern border of the County.

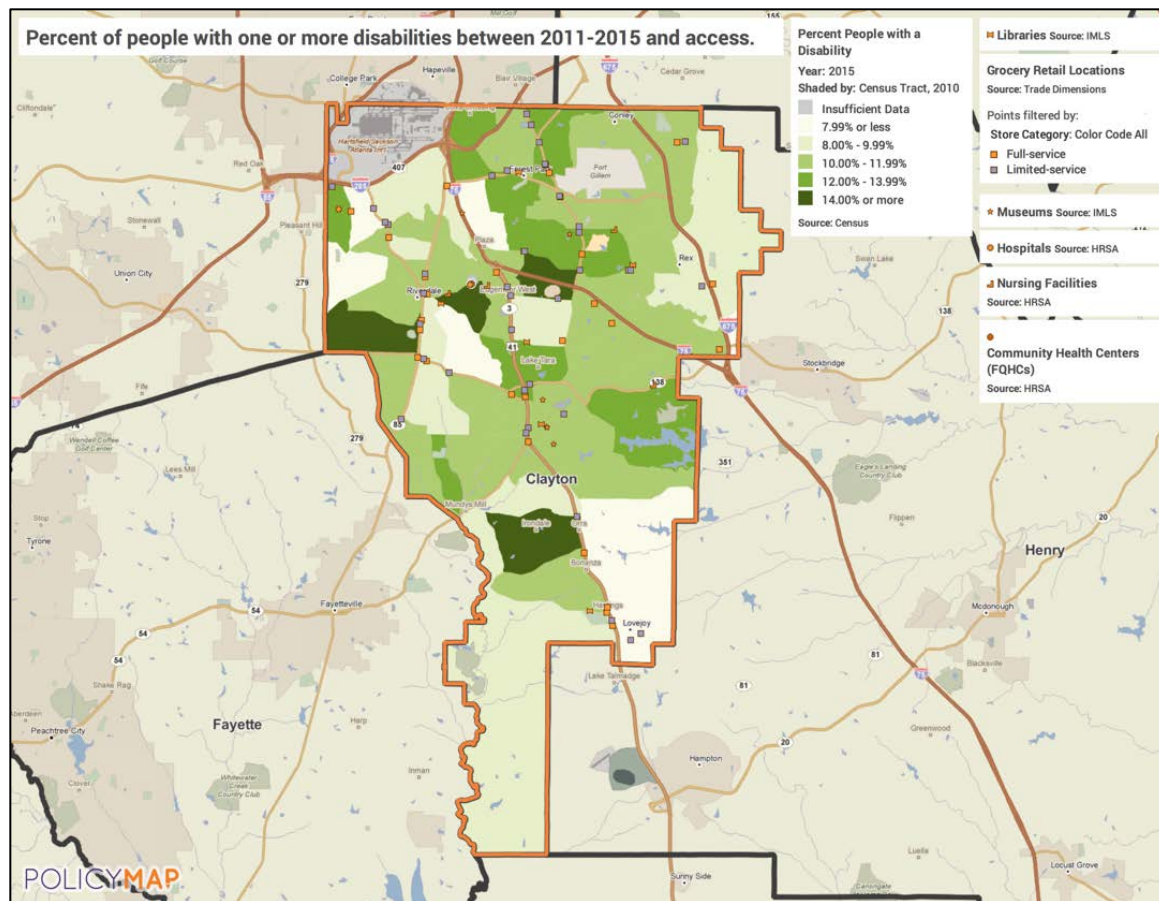
#### Race and Ethnicity and Disability Access

The disability rate for the County as a whole was 10.9 percent. Most minority groups having a percentage of disabled close to or below that rate, with only American Indians and Alaskan Natives having a 27.4 percent disability rate. Approximately 9.8 percent of Blacks and 7.3 percent of Asians were with a disability. Ethnic Hispanics were with only 4.7 percent with any disability. (2011-2015 ACS – S1810)

**b. The program participant may also describe other information relevant to its assessment of disability and access issues.**

Planning that takes into consideration the needs of the populations with disabilities is informed by an assessment of where high percentages of disabled persons reside in the County and how proximal these locations are to recreation, healthcare and grocery retail locations. Most of these locations are found right along the major roadways in the County, and also border most of the areas with high percentages of disabled persons (with the exception of the Irondale area).

MAP: Disability and Access



Source: 2011-2015 ACS via PolicyMap, IMLS, Trade Dimensions, HRSA

### Transportation Access

While access to hospitals, health clinics, community centers, libraries, and grocery and other retail locations is important, persons with a disability also need a reliable mode of transportation. The Clayton County Community Services Authority (CCCSA) offers transportation services with a special emphasis placed on the needs of disabled persons and the elderly in the County. Transportation services coordinated by CCCSA are offered through program participation in one of the many programs offered through the County, including the Day Care Program, Temporary Assistance for Needy Families Program, the Department of Labor-Vocational Rehabilitation Program, Clayton County Alzheimer's Support Services and recipients of the Meals-On-Wheels program. All passenger vehicles are designed to accommodate passengers with a disability, have wheelchair lift equipment, and are radio equipped.

MARTA Mobility (MM) is the County's service that provides ADA complementary paratransit service, however MARTA buses have fixed routes.



## **7. Disability and Access Issues Contributing Factors**

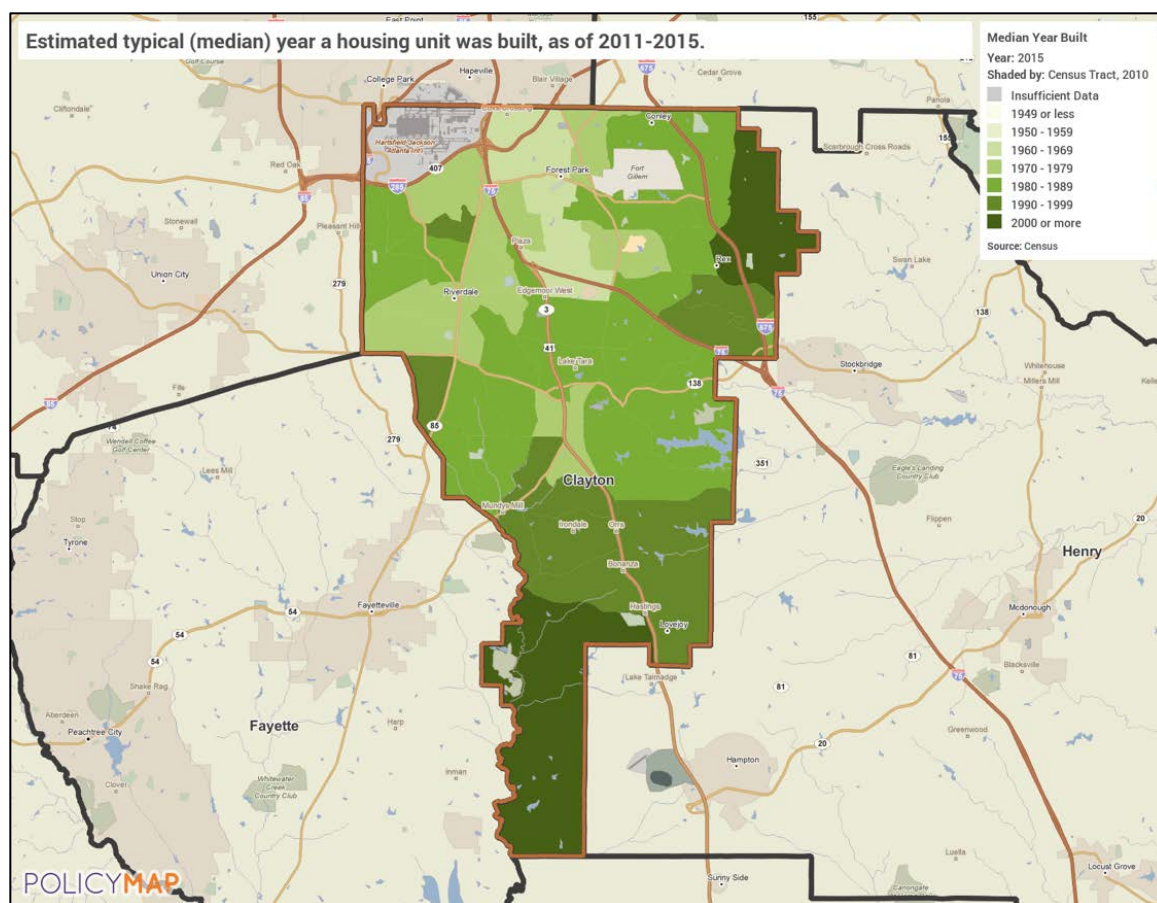
*Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disability and access issues and the fair housing issues, which are Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor, note which fair housing issue(s) the selected contributing factor relates to.*

- Access for persons with disabilities to proficient schools
- Access to publicly supported housing for persons with disabilities
- Access to transportation for persons with disabilities
- Inaccessible government facilities or services
- Inaccessible public or private infrastructure
- Lack of access to opportunity due to high housing costs
- Lack of affordable in-home or community-based supportive services
- Lack of affordable, accessible housing in range of unit sizes
- Lack of affordable, integrated housing for individuals who need supportive services
- Lack of assistance for housing accessibility modifications
- Lack of assistance for transitioning from institutional settings to integrated housing
- Lack of local or regional cooperation
- Land use and zoning laws
- Lending discrimination
- Location of accessible housing
- Loss of Affordable Housing
- Occupancy codes and restrictions
- Regulatory barriers to providing housing and supportive services for persons with disabilities
- Source of income discrimination
- State or local laws, policies, or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing, shared housing and other integrated settings
- Other

### ***Lack of affordable, integrated housing for individuals who need supportive services***

Generally, older homes are not as accommodating for persons who are disabled – due to housing that has not been adequately adapted to meet their needs and has fallen behind codes and regulations. According to the 2011-2015 ACS, just about two out of every five homes was built before 1980, or 39.1 percent of the housing units in the County. Below is a map that visually displays the areas where the median home age is 1980 or less. This area is also where a higher number of persons with a disability reside in relation of the rest of Clayton County.

MAP: Median Year Housing Unit was Built



Source: 2011-2015 ACS via PolicyMap

### ***Lack of assistance for housing accessibility modifications***

According to the County's 2013-2017 Consolidated Plan, housing for special needs populations, which includes persons who are disabled, was high priority. The County is also exploring opportunities to support the rehabilitation of public housing in partnership with the PHA in order to accommodate persons who are disabled.

### ***Access to publicly supported housing for persons with disabilities***

Persons with a disability face a long wait time for access into publicly supported housing. While the JHA takes disabled families as preference in its application selection, the waiting list for the JHA is currently closed. The PHA reported in its 2010 PHA plan that there were 20 families with a disabled family member on the waiting list for the Section 8 program and another 21 families with a disabled member for the public housing development in Jonesboro.

***Other: There is difficulty getting reasonable accommodation when there are fair housing issues for persons with a disability.***

The County promotes and makes reasonable accommodations for all persons with a disability, but due to the wide range of accommodations (such as ramps for children with mobility disabilities to children with autism requiring reduced apartment noise), the County has difficulty meeting the needs of all people with disabilities.

## **E. Fair Housing Enforcement, Outreach Capacity, and Resources Analysis**

### **1. List and Summarize any of the following that have not been resolved:**

- **A charge or letter of finding from HUD concerning a violation of a civil rights-related law;**
- **A cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law;**
- **Any voluntary compliance agreements, conciliation agreements, or settlement agreements entered into with HUD or the Department of Justice;**
- **A claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing; or**
- **A pending administrative complaint or lawsuit against the locality alleging fair housing violations or discrimination**

Currently, there are two housing complaints in the jurisdiction that have not been closed.

- Case Number 04-16-4870-8
  - Filed on 7/13/2016
  - Discriminatory refusal to rent or negotiate for rental based on race
  - Currently being investigated by HUD
  - City: College Park
- Case Number 04-17-5777-8
  - Filed on 10/27/2016
  - Discriminatory refusal to rent or negotiate for rental based on race
  - Currently being investigated by HUD
  - City: Jonesboro

The following table displays the discrimination complaints in the county by year since 2011. When multiple reasons are listed for discrimination only the primary one is counted.

<b>TABLE: Discrimination Complaints by Year and Type</b>							
	<b>Race</b>	<b>National Origin</b>	<b>Disability</b>	<b>Religion</b>	<b>Sex</b>	<b>Unknown or Other</b>	<b>Total</b>
2011	2	0	3	0	1	0	6
2012	0	0	0	0	0	0	0
2013	0	0	0	0	0	0	0
2014	0	0	1	0	0	0	1
2015	5	0	3	1	0	0	9
2016	2	0	3	0	0	0	5
Source: HUD							

## **2. Describe any state or local fair housing laws. What characteristics are protected under each law?**

Clayton County does not have any local ordinances related to fair housing protections.

Title 8, Chapter 3, Article 4 of the Georgia Code addresses Fair Housing at the state level. The characteristics protected under this law are an individual's race, color, religion, sex, disability or handicap, familial status, or national origin.

“§ 8-3-200. State policy; purposes and construction of article

(a) It is the policy of the State of Georgia to provide, within constitutional limitations, for fair housing throughout the state.

(b) The general purposes of this article are:

(1) To provide for execution in the state of policies embodied in Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988;

(2) To safeguard all individuals from discrimination in any aspect relating to the sale, rental, or financing of dwellings or in the provision of brokerage services or facilities in connection with the sale or rental of a dwelling because of that individual's race, color, religion, sex, disability or handicap, familial status, or national origin;

(3) To promote the elimination of discrimination in any aspect relating to the sale, rental, or financing of dwellings or in the provision of brokerage services or facilities in connection with the sale or rental of a dwelling because of a person's race, color, religion, sex, disability or handicap, familial status, or national origin; and

(4) To promote the protection of each individual's interest in personal dignity and freedom from humiliation and the individual's freedom to take up residence wherever such individual chooses; to secure the state against domestic strife and unrest which would menace its democratic institutions; to preserve the public safety, health, and general welfare; and to further the interests, rights, and privileges of individuals within the state.

(c) This article shall be broadly construed to further the general purposes stated in this Code section and the special purposes of the particular provision involved.”

**3. Identify any local or regional agencies or organizations that provide fair housing information, outreach, and enforcement, including their capacity and the resources available to them.**

Metro Fair Housing Services: The Metro Fair Housing Services is a regional organization that seeks “to promote social justice and eliminate housing and lending inequities for all people, including those with disabilities, through leadership, education and outreach, public policy advocacy and enforcement.” Metro trains individuals, professionals, housing providers, and organizations on federal and state housing laws. It also enforces federal and Georgia laws through investigation and resolution of housing discrimination. Additionally, it provides mortgage and landlord-tenant counseling for those in need.

The Housing Authority of Clayton County: The Housing Authority of Clayton County was originally created to act as a financial “conduit” providing tax exempt financing for developers who wanted to construct or rehabilitate multifamily homes. They currently focus on housing redevelopment and rehabilitation and partnering with government agencies to address housing issues in the community.

Jonesboro Housing Authority: The Jonesboro Housing Authority is the regional authority that issues HUD public Housing and the Section 8 Housing Choice Voucher Programs for the county. Their mission “is to assist eligible low income families with safe, decent and affordable housing as they strive to achieve self-sufficiency and improve the quality of their lives.”

Southern Crescent Habitat for Humanity (SCHFH): The SCHFH is a nonprofit organization that works to build affordable housing and provide homeowner education for low-income families in Henry, Clayton, and Fayette County.

Clayton County Community Services Authority: CCCSA provides emergency short term financial assistance with case management services and referrals to individuals or families facing evictions, foreclosures, imminent disconnection of utilities, or emergency food assistance. Residents are also provided employment counseling and training, and education and training to help enhance self-sufficiency. CCCSA promotes and adheres to equal housing opportunity in the County.

#### **4. Additional Information**

- a. Provide additional relevant information, if any, about fair housing enforcement, outreach capacity, and resources in the jurisdiction and region.**

The state of Georgia does not have any local or statewide public entities that are certified as a Fair Housing Assistance Program authorized to enforce fair housing. However, there are several organizations that address fair housing issues in the county.

Georgia Fair Commission on Equal Opportunity (GCEO): Residents who feel their fair housing rights have been violated can contact the GCEO. The GCEO will then investigate the complaint, collect relevant facts and data and interview parties, assist both parties in making an agreement, and make a determination based on the findings.

Georgia Department of Community Affairs: The Georgia Department of Community Affairs provides educational opportunities with regards to fair housing to both landlords and tenants.

- b. The program participant may also include information relevant to programs, actions, or activities to promote fair housing outcomes and capacity.**

According to the 2011 Clayton County Analysis of Impediments to Fair Housing, six barriers are present in Clayton County. The county has begun work to address each of these barriers.

*1. Home Foreclosure Crisis and Neighborhood Quality*

- Utilize NSP to purchase and rehabilitate foreclosed properties
- Strengthen code enforcement activities to force REO properties to maintain the property
- Identify local organizations and other opportunities to assist troubled homeowners

*2. Housing Brokerage Practices Restrict Fair Housing Choice*

- Further Fair Housing objectives through realtors, government action and outreach through Metro Fair Housing to minimize any form of segregation or discrimination
- Utilize marketing strategies that incorporate affirmatively furthering fair housing
- Continue monitoring HMDA data, banking & mortgage companies, and participants
- Develop and distribute fair housing materials
- Annual review of housing discrimination complaints made to the Georgia Civil Rights Department-Georgia Commission on Equal Opportunity, Latin American Association, Atlanta Legal Aid and the Impact Group
- Identify special interest groups and community organizations that serve protected classes and provide information that raises their awareness to fair housing rights

*3. Zoning Ordinances, Code Enforcement and Design Guidelines*

- Recommend that municipalities located within Clayton County revise their zoning ordinances to support more affordable housing opportunities
- Recommend that municipalities within Clayton County provide relief from architectural design guidelines to providers of affordable housing

- Work with local organization to identify ways to subsidize ADA accessible improvements to substandard homes
- 4. *Limited Housing Options for the Physically Impaired and Disabled*
  - Work with local organization to identify ways to subsidize ADA accessible improvements to substandard homes
  - Increase housing options for the disabled by utilizing the Home Repair Program to identify ways to update substandard homes to ADA standards
- 5. *Limited Access to Public Transportation*
  - Explore local, state and federal funding opportunities to continue the operation of C-TRAN bus service
  - Identify private operators that can provide public transit services to county residents
- 6. *Government Programs That Restrict Housing Choice*
  - Work with regional offices of HUD to identify opportunities to increase the availability of Section 8 vouchers
  - Work with landlords and the Jonesboro Housing Authority to identify opportunities to increase participation in the Section 8 voucher program
  - Through the NSP, Section 8 Homeownership Program and in partnership with Habitat for Humanity, work to increase homeownership opportunities for low-income families
  - The county will review zoning laws to guarantee the incorporation of zoning incentives with will include inclusionary zoning and density bonuses and work to improve transportation linkages and access to underserved communities.
  - Increase community awareness of affordable housing needs and fair housing through Metro Fair Housing, the NSP, and updates to the Consolidated Plan
  - Use public education programs to reduce fears, resistance, and misperceptions that many identify with affordable housing.

## **5. Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors**

***Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the lack of fair housing enforcement, outreach capacity, and resources and the severity of fair housing issues, which are Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each significant contributing factor, note which fair housing issue(s) the selected contributing factor impacts.***

- Lack of local private fair housing outreach and enforcement
- Lack of local public fair housing enforcement
- Lack of resources for fair housing agencies and organizations
- Lack of state or local fair housing laws
- Unresolved violations of fair housing or civil rights law
- Other



Of the seven (7) organizations listed above that provide fair housing assistance, only two are private organizations (Metro Fair Housing and SCHFH). Additionally, both of these organizations are regional and do not focus on Clayton County as a whole. This points to a ***lack of local private fair housing outreach and enforcement*** in the jurisdiction. This can contribute to segregation, disparities in access to opportunity, and disproportionate housing needs.

The remaining four organizations that provide fair housing assistance are public organizations. Unfortunately, none of them are certified as a Fair Housing Assistance Program authorized to enforce fair housing. This ***lack of local public fair housing enforcement*** can contribute to segregation, disparities in access to opportunity, and disproportionate housing needs. These last two points combined point to a ***lack of resources for fair housing agencies and organizations.***

The analysis in this section presents the characteristics and the conditions on the ground in the County. While the census data and other data provide the hard data, it is supplemented by the nuances that are experienced by stakeholder and members of the community. While there are certainly challenges to be addressed, there are also areas that have seen improvement and continue to move in a positive direction. The hope is that with prioritization of these contributing factors and the goals set to address issues of fair housing that can be found in the following sections, Clayton County will continue its progress.

## VI. Part 1: Identifying and Prioritizing Contributing Factors

Identifying and Prioritizing Contributing Factors		
<p>As outlined in Section V, each housing issue has associated contributing factors. The table below shows each fair housing issue and the contributing factors with the highest ranking given to that factor that has the most impact on the issue. The most common contributing factors across the fair housing issues are <b>displacement</b> and <b>access</b> to affordable and special needs housing. While all the factors are important to address, they are ranked in priority order within each fair housing issue section. The goals table in Part II of this Section reflects what the County plans to do to address these priority issues.</p>		
Fair Housing Issues	Contributing Factors	Prioritization and Justification
Segregation	Location and type of public housing	<p><b>1.</b> Clayton County is one of the Counties in the Metro Atlanta region that is just now emerging from the recession. As such, there is still much need for housing units that house low- and very low-income residents. Without the availability of these units, LI and VLI residents often find themselves in economically and racially segregated neighborhoods. The County has two Public Housing Authorities. Of those, one of them runs homeownership programs and financing programs in partnership with other organizations, and one runs the County's Housing Choice Voucher program and project based Section 8 program. There is one (1) public housing property in the County.</p>
	Displacement of residents due to economic pressures	<p><b>2.</b> Clayton County is just now beginning to emerge from the recession. While jobs are beginning to become available, the economic situation of many residents means that few are able to afford staying in their current housing or are moving to economically advantageous neighborhoods. In fact, most have had to move to places that are considered less desirable.</p>
	Loss of affordable housing	<p><b>3.</b> Despite the fact that housing costs in the County are generally lower, there is still housing burden given the lower incomes of many residents.</p>

	Lack of a community revitalization strategy	<b>4.</b> The County is making a concerted effort to reorganize its planning and zoning department to emphasize revitalization.
	Deteriorated and abandoned properties	<b>5.</b> The condition of properties in LMI neighborhoods is something that is a result of the hardship the County endured during the economic crisis. Clayton County had one of the highest foreclosure rates in the country, and it is just starting to come out of that economic downturn. Foreclosure has led to many properties suffering from prolonged vacancy and little to no upkeep. Addressing this issue will have positive effects on a range of other issues of concern.
	Private discrimination	<b>6.</b> In stakeholder meetings, the general feeling was that this issue is not one that is particularly pressing or prevalent, however, the data shows concentrations of poverty and anecdotes from individual stakeholders do raise this as a concern. The fact that there are inconsistencies between group perceptions and individual perceptions of this issue suggests that it must be placed as one of the priority factors to be addressed.
<b>R/ECAPs</b>	Displacement of residents due to economic pressures	<b>1.</b> As mentioned above, the economic pressures that arose due to the recession had a major impact on resident displacement. Clayton County was in the top five places in the country for foreclosures. As a result, “institutional investors” have bought foreclosed properties and are increasing rents further displacing LMI residents.
	Location and type of affordable housing	<b>2.</b> The reality of driving through the County is that there are certain neighborhoods that have suffered from private and public disinvestment. Housing that is affordable to LMI residents tends to be concentrated in these areas.
	Private discrimination	<b>3.</b> As stated above, private discrimination is an issue about which there are competing perceptions. On the one hand, there was general agreement that there is no discrimination and that the neighborhoods were fairly integrated, but by the same token, certain subgroups are perceived to have a more difficult time finding housing in particular places.

<b>Disparities in Access to Opportunity</b>	Location of employers	<b>1.</b> As mentioned, Clayton County was particularly hard hit by the recession. It is emerging, but its economic base is slow to pick up. Despite the fact that Clayton County is home to Hartsfield-Jackson Airport, much of the economic activity it drives has not yet made a significant impact. The County is working with the Aerotropolis Atlanta CID and has valuable partners in area community colleges and technical programs, but of the jobs offered are still difficult to access for County residents.
	Lack of public investment in specific neighborhoods	<b>2.</b> There are several neighborhoods in the County that suffer from blighted conditions and disinvestment. The County has made an effort to combat this through improved code enforcement and additional investment, however, given the slow economic recovery and shrinking resource base, investment has not kept apace. As the County emerges from the recession, this will be a priority.
	Deteriorated and abandoned properties	<b>3.</b> As mentioned above, addressing this issue will have positive effects across other issue areas, and this is one. Rightly or not, perception about the quality and livability of a neighborhood is often formulated by aesthetic judgements. Addressing this issue can change those perceptions and spur willingness to see these neighborhoods as worthy of investment not only by owners and renters, but potential investors as well.
	Location of proficient schools	<b>4.</b> The issue of the quality of Clayton County Schools is one that is particularly pressing for County officials. The nomenclature in the AFH contributing factors, “location of proficient schools”, is limiting in Clayton County’s case because it’s not the location of a particular school that is the problem, it is the overall perception of the school system itself. All of Clayton County’s schools lost their accreditation in 2008. Since then, the County has worked to right the school system, and by 2012, they regained accreditation. Despite this, the negative attention to the schools continues in local and regional media coverage, and the perception of a woefully inadequate school system persists. While there have been gains in school resources and Clayton County students have been honored with regional

		awards, that kind of information is not broadly disseminated and needs to be. Changing the regional perception of the school system is a must for other investments to flow into the County.
	Location and type of affordable housing	<b>5.</b> Location of housing that is affordable to the County's low-income residents is still often concentrated. There is a strong public perception that the County does not need more affordable housing, but the reality is that many residents of the County still find themselves housing cost burdened.
	Availability, type, frequency, and reliability of public transportation	<b>6.</b> While there have been marked improvements to transportation access, especially for lower income residents, there is still a barrier to mobility for many residents, especially those living in affordable housing. Advocacy work on transportation access needs to continue.
	Land Use and Zoning Laws	<b>7.</b> While this issue is connected to the preceding issues, it cannot be given top priority since on its own it will not address fair housing per se. Taken alongside a focus on the other issues, however, improvements to land use and zoning laws can make a significant positive impact on the issues listed above in this Fair Housing Issue.
	Access to financial resources	<b>8.</b> This particular issue is not at the top of the perceived factors contributing to fair housing choice, however, the data show that there continues to be disparity in access to financial resources. Fortunately, the County has lenders and financial institutions that do serve LMI populations, but there needs to be more public awareness of them.
	Lending Discrimination	<b>9.</b> HMDA data shows that there is a significant disparity in mortgage denials between White, Asian, Black, and Hispanic borrowers. The reasons for denials are similar across races and ethnicities, and the most common of the reasons include credit history and available funds for downpayments. Roughly 45% of Black and Hispanic borrowers are denied mortgages, while Whites and Asians are denied at a rate of roughly 30%. In addition, after the financial crisis when the County was hit hard with foreclosures, the incidence of subprime lending has come down to align with industry averages.

		However, subprime lending is still out there. These issues need to be addressed through homebuyer education and assistance.
<b>Publicly Supported Housing Location and Occupancy</b>	Community opposition (NIMBY)	<b>1.</b> If asked whether Clayton County needs additional affordable housing, many County residents opine that it does not. There is a misconception that low cost or inexpensive housing compared to the region means that affordable housing is not needed. The data shows that affordable housing is a need, and that it is a need particularly for the lowest income residents in the County. The problem of NIMBYism is prevalent, especially as it pertains to siting public housing. Working with the County, the new leadership of the Jonesboro Housing Authority is poised to begin to change those perceptions, and do the outreach necessary to educate the public about the nuances of affordable housing.
	Impediments to mobility	<b>2.</b> With the County generally being slow to emerge from the economic downturn, the lack of public housing options for LI and VLI populations make it very difficult for these residents to find suitable housing in a variety of neighborhoods.
	Lack of private investment in specific neighborhoods	<b>3.</b> As mentioned before, there are few public housing units available to residents in the County, and the voucher program has a waiting list that has been closed. There is lack of investment to create more housing opportunities, and when there is investment, it is often concentrated in certain parts of the County.
	Lack of meaningful language access	<b>4.</b> Clayton County has seen a steady rise in its Limited English Proficiency population. Spanish and Vietnamese speakers are significant in numbers. The County is beginning a concerted effort to reach out to these communities to provide meaningful language access, but it has not made many inroads to date.
	Quality of affordable housing information programs	<b>5.</b> The County has some strong real estate education programs that are well attended, however, it does not have the same type of participation in

		informational sessions for affordable housing programs. This applies to both residents and landlords.
	Admissions and occupancy policies and procedures, including preferences in publicly supported housing	<b>6.</b> There are two Housing Authorities in the County. One primarily works with partner organizations on homeownership programs, and the other runs the voucher programs and manages one development. The latter has undergone changes in leadership and is emerging as a vocal advocate for housing issues in the County.
	Private discrimination	<b>7.</b> As with other issues, this one is inextricably tied to other forces at play in the provision of housing. In this case, private discrimination often forces individuals into untenable housing situations because they are unable to obtain housing on the private market, or for a variety of reasons – including reasons related to the protected classes – lose housing they had. The correlation between this issue as a potential cause of instability in housing makes it one to prioritize.
	Availability of affordable units in a range of sizes	<b>8.</b> Most of the housing stock in the County includes single family homes, often with three bedrooms. Larger families are often hard pressed to find suitable housing for their family size. On the flip side, single residents or those with the need for smaller housing sizes find it equally difficult to find housing that meets their needs. Having more diversity of housing sizes will address the needs of both larger families, and single people, or the elderly seeking to find appropriate housing. The County's work with developers of affordable housing this issue will be raised and the work of the Housing Authority on increasing access for disabled housing.
<b>Disability Access</b>	Lack of assistance for housing accessibility modifications	<b>1.</b> According to the latest fair housing reports, discrimination based on disability was the highest-ranking complaint. Many of the complaints were about lack of assistance in making modifications to the living units.
	Access to publicly supported housing for persons with disabilities	<b>2.</b> This issue goes hand in hand with the lack of access to affordable housing more generally. The problem is amplified for persons with disabilities.



	Lack of affordable, integrated housing for individuals who need supportive services	<b>3.</b> As mentioned above, there are few housing advocacy organizations that work specifically with populations in need of special assistance. Of those, most of them work in specific silos of the special needs issue area. There are many privately run group homes, but there is little zoning guidance for them and are therefore difficult to track.
	Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking	<b>4.</b> The special needs housing community in the County is small with a handful of providers offering services. The resources for these organizations are meager and there is a nascent knowledge of the continuum of care framework to support residents in these situations that are in need of housing support. The County will continue to support the increased capacity of these groups with the resources that are or become available.
	Other: There is difficulty getting reasonable accommodation when there are fair housing issues for persons with a disability	<b>5.</b> The County promotes and makes reasonable accommodations for all persons with a disability, but due to the wide range of accommodations (such as ramps for children with mobility disabilities to children with autism requiring reduced apartment noise), the County has difficulty meeting the needs of all people with disabilities.
<b>Fair Housing Enforcement, Outreach Capacity, and Resources</b>	Lack of local private fair housing outreach and enforcement	<b>1.</b> Metro Fair Housing is an Atlanta region fair housing organization that is increasingly playing a role in the County. They have been far more active in other parts of the region, but are recently seeing more opportunities for education and engagement with County staff, residents, and landlords.
	Lack of local public fair housing enforcement	<b>2.</b> The County has relied on the services of Metro Fair Housing and the Georgia Commission on Equal Opportunity to identify and guide action on fair housing issues. The County itself monitors fair housing through the Community Development Department.
	Lack of resources for fair housing agencies and organizations	<b>3.</b> With fresh leadership in several positions that have an impact on fair housing issues, the resources devoted to the issue are beginning to increase. It has historically not been an area of high priority due to the economic pressures the County has faced in the last decade.

	Lending discrimination	<b>4.</b> Given the disparity in lending across races and ethnicities, education about homeowner preparedness must be incorporated into the outreach work of fair housing organizations. HMDA data suggests that the issue with most borrowers is not that they could not make the monthly payments associated with the mortgage, but that their credit histories and downpayments are falling short. Addressing the credit history problems and ability to accrue sufficient funds for downpayments will need to be a focus of the work going forward.
	Private discrimination	<b>5.</b> As stated above, this is one of the issues that is interrelated across topics, and it needs to be prioritized in order to address issues and move towards meeting the County's stated fair housing goals.
	Lack of assistance for transitioning from institutional settings to integrated housing	<b>6.</b> There are several community based organizations that work providing social services to at risk populations. The County also has several departments that work hand in hand with the neighborhood organizations. The problem is largely due to a lack of resources going to these organizations to provide services. The County has programs, but they also fall short of meeting the growing needs of the community. Program capacity notwithstanding, there needs to be a focus on making more integrated housing units more available, particularly for people with criminal records trying to reintegrate into the community and victims of domestic violence. In particular, many landlords do not accept people with criminal records as tenants, leaving many without housing options and relegating them to "couch surfing" for years. Addressing this issue will be key to reducing the homeless population in the County.
	Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking	<b>7.</b> This issue arises as a fair housing issue due to the dearth of available housing choices for victims of domestic violence. In the context of special needs housing, victims of domestic violence can be considered a target population.

**Clayton County AFH Goals**  
**Narrative and Table**  
**Revised January 22, 2018**

**Goal #1: Increase Public Awareness of Fair Housing Rights for All Communities**

In Clayton County, the first goal is designed to increase public awareness of fair housing rights for all communities in the jurisdiction. Data analysis and community engagement reveal a lack of understanding of fair housing rights. Factors that contribute to this issue are limited local private fair housing outreach and enforcement and resources of the area's fair housing organization. Clayton County is served by Metro Fair Housing which serves a multi-county region and historically has been far more active in other parts of the region. Although the County has relied on the services of Metro Fair Housing and the Georgia Commission on Equal Opportunity to identify and guide action on fair housing issues, it has begun to recognize more opportunities for education and engagement with its staff, residents, and landlords. Resources devoted to the issue are beginning to increase. Metro Fair Housing is also playing an increasing role in the County. To make all communities more aware of fair housing rights, the County plans to have Metro Fair Housing conduct more informative meetings throughout the County. The jurisdiction also expects to build stronger relationships with LEP organizations in the County. The County will continue to monitor fair housing efforts through the Community Development Department. As a result of these actions, all communities will become better aware of fair housing rights.

Goal #1	Strategy	Fair Housing Issues	Contributing Factors	Timeframe for Action	Measure and Achievement	Responsible Program Participant(s)
Increase public awareness of fair housing rights for all communities	A. Collaborate closely with Metro Fair Housing to increase the number of public meetings they conduct throughout the County. Include more meetings and outreach in their scope of work for County funding	Fair Housing Enforcement, Outreach Capacity, and Resources	Lack of local private fair housing outreach and enforcement; Lack of resources for fair housing agencies and organizations; Private discrimination; Lending discrimination;	12-36 months	Meetings per year per group conducted with at least 20 people  Specify addition to scope of work; hold two meetings; and report in CAPER	Metro Fair Housing (under direction from Community Development Department)

	<p>B. Develop stronger relationships with LEP organizations in the County. Currently have contact with two organizations, but increase the number of LEP partner organizations and create schedule for check in meetings to identify areas of collaboration.</p>		<p>Lack of meaningful language access</p>	<p>Present – 12 months</p>	<p>Involvement of Spanish and Vietnamese – speaking organizations</p> <p>Ask staff to identify new groups; establish relationships with at least two; and report in CAPER</p>	<p>Community Development Department – HUD Programs Division</p>
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## Goal #2: Complete, Approve, and Implement Rewrite of Planning and Zoning Ordinances

The second goal is to complete, approve, and implement a rewrite of planning and zoning ordinances. The location and type of affordable housing has contributed to disparities in housing needs and access to opportunity in Clayton County. Also, the availability, type, frequency, and reliability of public transportation present a barrier to mobility for many residents, especially those living in affordable housing. The Clayton County Board of Commissioners adopted an updated Zoning Ordinance on May 30, 2017. The County expects to continue work toward implementation of the updated zoning code and land use ordinances. It will also support new mixed use/inclusive and redevelopment projects in the County by creating various zoning districts. This will include Transit Oriented Development (TOD) projects along the county's main corridors. Such development is expected to address access to housing and potential job opportunities.

Goal #2	Strategy	Fair Housing Issues	Contributing Factors	Timeframe for Action	Measure and Achievement	Responsible Program Participant(s)
Complete, approve, and implement rewrite of planning and zoning ordinances	A. Adopt and begin implementation of updated zoning code and land use ordinances. (Continue the work of the Board of Commissioners who adopted updated Zoning Ordinance on May 30, 2017)	Disproportionate Housing Needs; Disparities in Access to Opportunity	Land use and zoning laws; Location and type of affordable housing; availability, type, frequency, and reliability of public transportation; Availability of affordable units in a range of sizes	Present- 6 months	Policy implementation impact through new, inclusive, mixed use developments  Identify and guide one model development project	Planning & Zoning Department
	B. Support new mixed use/inclusive and redevelopment projects in the County by creating various zoning districts. Support TOD projects along the county's main			12-60 months	Use of planning tools  Successfully implement planning tools to improve access, mobility, green and healthy	Community Development Department

	<p>corridors. Support of TOD development would address access to housing potential job opportunities. The new zoning categories also support Clayton current housing stock, as they foster development of mixed of commercial, offices and hospitality settings intended for gathering places with emphasis on public art, open spaces for multimodal urban settings</p>				<p>neighborhoods (Green Community Status and implementation of LID ordinance), and continue implementation of Comprehensive Plan items that speak to equity and health</p>	
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### Goal #3: Share Progress Reports and Successes of School Improvements Across Departments and Potential Investors

In discussions with County staff and community stakeholders, it is a strongly held belief that there are moves in a positive direction when it comes to school administration, performance, and availability of resources. The fact that the metro area media attention on the schools system has been largely negative and news about the re-accreditation and positive aspects of the school system have not been broadly disseminated have created a metro-wide perception that Clayton County is not a place to choose for young families. This has resulted in difficulty attracting a more socio-economically diverse set of families that are willing to rent or own housing in Clayton County. It has also resulted in difficulty attracting investments – businesses willing to relocate to Clayton County – because of concerns that they will not be able to attract a workforce willing to live, work, and send their children to school in Clayton County. With a more positive perception of what Clayton County schools have to offer, the County hopes that more young families will be interested in buying homes there and that businesses will be more willing to invest in the County; both outcomes that will raise tax revenue and in turn begin to increase financial support for struggling schools located in neighborhoods that have lacked investment. This is at its essence a marketing campaign that is the necessary first step to ultimately increasing the revenues available at the County to increase the number of proficient schools and improve access to better education for Clayton County students across the board.

Goal #3	Strategy	Fair Housing Issues	Contributing Factors	Timeframe for Action	Measure and Achievement	Responsible Program Participant(s)
Share progress reports and successes of school improvements across departments and potential investors	A. Promote reaccreditation of Clayton County Schools. Support County's rebranding efforts by posting information across County departmental websites	Disparities in Access to Opportunity	Location of proficient schools  Other: Change the perception of schools in local and regional areas	Present – 12 months	Change of perception in the broader Metro area Obtain two positive media/press write ups in local newspapers and television	School Board; Economic Development Department



	<p>B. Work with the Clayton County Public Schools (CCPS) Communications Department to use a variety of platforms to share information about the school system to all stakeholders. Notifications include but are not limited to: CCPS Website, Social Media platforms, Infinite Campus, School Messenger Telephone Notification System (phone &amp; email announcements), print/digital announcements (School Clayton Proud magazine, annual reports,</p>			1-5 years	<p>Increase citizen participation in social media platforms and number of school district surveys, stakeholder polls, and community meetings.</p> <p>Attract 10% increase in number of social media followers; conduct two surveys, polls and community meetings</p>	School Board; Economic Development Department
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	brochures, school television station (Ch. 24) and scheduled community meetings, etc.					
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#### **Goal #4: Use Code Enforcement as a Tool for Community Revitalization**

The deteriorated condition of properties in many Clayton County commercial corridors has been caused by either the lack of financial resources or the lack of making it a priority when it comes to making improvements to their commercial properties and/or landlords and commercial property. This general lack of dollars flowing into these buildings results in deteriorated and abandoned properties that do not appeal to commercial investors for redevelopment opportunities. By focusing on code enforcement in the commercial corridors abutting LMI neighborhoods, the County aims to improve the commercial viability and vitality of the businesses in the corridor, resulting in more foot-traffic, eyes on the street for community safety, and in turn increasing job opportunities for local residents.

In addition to improving commercial corridors abutting residential neighborhoods, the County intends to focus on improving the physical condition of the abutting LMI neighborhoods. On the residential side, the lack of funds to fix dilapidated homes by owners and/or unscrupulous landlords has led to some substandard housing conditions. Despite these conditions, situations exist where landlords are charging exorbitant rents for dilapidated properties that residents feel they have no choice but to live in.

By using code enforcement as a tool, the County can begin to address basic property maintenance standards, hold residents and landlords accountable when in violation of those standards, and in turn, improve the economic vibrancy of the commercial corridors and economic opportunities for abutting residents. This goal will dovetail with a community revitalization strategy that targets the hardest hit areas and pilots a new façade improvement program for commercial corridors and a new home repair program in the abutting LMI neighborhoods to address critical violations.

Goal #4	Strategy	Fair Housing Issues	Contributing Factors	Timeframe for Action	Measure and Achievement	Responsible Program Participant(s)
Use Code Enforcement as a Tool for Community Revitalization	A. Ensure implementation of Clayton County's Property Maintenance Ordinance	R/ECAPs; Segregation; Disproportionate Housing Needs	Displacement of residents due to economic pressure; Deteriorated and abandoned properties; Lack of community revitalization strategies	Present – Ongoing	Number of benchmark citations and abatements  Track level of enforcement and document incremental increases each year to demonstrate improved property maintenance; eliminate back log of complaints	Code Enforcement Officer, Police Department; Community Development Department
	B. Closer coordination between Police Department Code Enforcement as well as consideration of pilot home repair program in target areas (critical code violations)			12-18 months	Coordinated enforcement protocol  Prioritize citations within target area (once backlog is eliminated); obtain and review semi-annual progress reports	Code Enforcement Officer, Police Department; Community Development Department
	C. Offer Façade improvement grants on a 50% -					

	50% match as an economic tool			18-24 months	[Dedicate economic development funds to support the grant; criteria to accept applications for a Public-Private Partnership]	
	D. Enforcement of the Property Maintenance and Quality of Life Ordinances will continue to be carried out by the Police Department, Code Enforcement Division. The Code Enforcement Officer, which is funded through HUD will focus on Clayton's commercial corridors enforcement the Zoning Ordinances, such as signs and outdoor storage			24 months	<p>Benchmark citations and abatements and track them to show they are decreasing</p> <p>Reduction of complaints by 10% over a 2-year period; Quarterly meeting between departments to coordinate progress</p>	Code Enforcement Officer, Police Department

### Goal #5: Educate Landlords about HUD Guidance Regarding Criminal Records

This goal is to educate landlords about HUD guidance regarding criminal records. Community opposition, private discrimination, lack of assistance for transitioning from institutional settings to integrated housing and other factors have created a fair housing issue. These factors cause disproportionate housing needs. Underlying that need is a lack of proper understanding of HUD guidance and effective outreach. The County intends to encourage Metro Fair Housing to aggressively promote education for landlords and property managers, test for results, and, if necessary, further educate the landlords.

Goal #5	Strategy	Fair Housing Issues	Contributing Factors	Timeframe for Action	Measure and Achievement	Responsible Program Participant(s)
Educate landlords about HUD guidance regarding criminal records	A. Encourage Metro Fair Housing, a HUD sub-recipient, to aggressively promote education for landlords and property managers	Disproportionate Housing Needs; Fair Housing Enforcement, Outreach Capacity, and Resources	Community opposition (NIMBY); Displacement of Residents due to economic pressure; Private discrimination; Impediments to mobility; Lack of assistance for transitioning from institutional settings to integrated housing	Present – 36 months	Meetings conducted specifically for landlord education on this issue and track participation levels.  Hold two meetings per year	Metro Fair Housing; Community Development Department – HUD Programs Division; Economic Development Department

	B. Conduct a fair housing test. If it is still a factor, report it and educate landlords			12-18 months	Fair housing tests  Conduct before and after tests at annual educational, fair housing workshop to see if reduced findings	Metro Fair Housing and Community Development Department – HUD Programs Division
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## Goal #6: Increase Affordable Rental Housing Options

The County is determined to avoid a situation where future affordable housing development is concentrated in the less desirable areas of the County. This goal addresses location and type of affordable housing by ensuring that there is an integration of affordable housing production in the new mixed-use zoning district and the TOD projects that eventually come online as a result. The County is looking to incorporate multiple, affordable housing options in desirable locations for future developments. As a result, mixed used zoning districts have been adopted and may aide in addressing the disparity to access to opportunity that has led to segregation and the resulting R/ECAPs. It was noted via the stakeholder interviews that options for affordable housing, such as condos, townhomes, and/or mixed-income developments are not currently available to low-moderate income residents. This AFH will be used to heighten awareness of the fair housing issue identified below and to gain cooperation in addressing the stated goal and strategy.

Goal #6	Strategy	Fair Housing Issue	Contributing Factors	Timeframe for Action	Measure and Achievement	Responsible Program Participant(s)
Create diverse affordable rental housing options	A. Create policies to promote quality affordable rental housing via land use, zoning, and building codes in support of the Board of Commissioner's new mixed-use zoning district category. This would address access to housing and potential job access opportunities.	Segregation; R/ECAPs; Disparities in Access to Opportunity; Disproportionate Housing Needs; Insufficient Publicly Supported Housing (we have an abundance of publicly supported housing – one of the problems is that they are in a state of disrepair)	Location and Type of Affordable Housing; Displacement of Residents Due to Economic Pressure; Private Discrimination; Availability of affordable units in a range of sizes	1-5 years	Policy initiatives, guidelines and protocols over 1-5 years:  Implement new mixed-use zoning district category that supports development of TOD projects along the main corridors; design and implement planning processes for Urban Village projects which include at the minimum 2 affordable housing	Planning & Zoning for policy; Community Development Department for construction standards; building and development community; Jonesboro Housing Authority

					advocate organizations	
	B. Use the AFH study to support advocacy and understanding of the need for diverse types of affordable housing.			9-12 months	Public release of AFH  Issue media releases on completion of study; post study on 5 County websites	Community Development Department – HUD Programs Division; Jonesboro Housing Authority
	C. Build out relationships with development community and work with them to develop realistic targets and production of the number of units to be developed			12-36 months	Plan and development strategy for rental  Hold conversations with development community within first 9-12 months; set definitive goals within 24 months; increase number of rental units of 10% over next 5 years; also increase senior housing choices and range of supportive housing units; accomplish 36-60 build out of units	Community Development Department – HUD Programs Division; Jonesboro Housing Authority

## Goal #7: Increase Access to Special Needs Housing

According to the latest fair housing reports, discrimination based on disability was the highest-ranking complaint. Many of the complaints were about lack of assistance in making modifications to the living units. In addition, there are limited housing advocacy organizations working specifically with populations in need of special assistance. Of those, most of them work in specific silos of the special needs issue area. There are many privately run group homes, but there is little zoning guidance for them and are therefore difficult to track. The County promotes and makes reasonable accommodations for all persons with a disability, but due to the wide range of accommodations (such as ramps for children with mobility disabilities to children with autism requiring reduced apartment noise), the County has difficulty meeting the needs of all people with disabilities. In addition, providers and advocates for victims of domestic violence are in need of special needs housing that includes rental housing and legal services. In order to meet the goal of increasing access to special needs housing, the County will need to coordinate the conversation on the topic among the various stakeholders including but not limited to: elected officials, community residents and their advocates, housing providers and developers, contractors who build the housing, and social service providers.

Goal #7	Strategy	Fair Housing Issues	Contributing Factors	Timeframe for Action	Measure and Achievement	Responsible Program Participant(s)
Increase the amount of special needs housing	A. Begin regular dialogue with elected officials to garner support	Disability and Access Issues; Fair Housing Enforcement	Private discrimination; Lack of affordable, integrated housing for individuals who need supportive services; Access to publicly supported affordable housing for persons with disabilities; Lack of assistance for housing accessibility modifications; Displacement of and/or lack of housing support for victims of domestic violence, dating	12-36 months	Public support from elected officials  Gain support of two or more officials, convene 5 meetings and track public participation	Economic Development Department; Senior Services Department; Community Development Department

			violence, sexual assault, and stalking	12-24 months	Annual meetings  Hold two annual meetings	Senior Services Department; Community Development Department
	B. Convene annual meeting to solicit community input on special needs housing					
	C. Modify existing guidelines for construction or creation of group and special needs housing. Identify special needs housing developers and beginning a dialogue with them.			12-24 months	Improved guidelines  Create new guidelines that specifically articulate minimum standards for special needs housing (by special needs category)	Community Development Department; Planning & Zoning Department
	D. Integrate special needs housing into other residential or planned developments			36-60 months	Implementation of strategy  Identify a priority group for TBRA all resulting in a 5% increase in number of special needs housing units in three years,	Community Development Department

					(including those developed along transit corridors providing access to mobility for residents).	
	E. Promote and encourage ADA- compliant housing along major transportation routes			24-48 months	<p>Development plans</p> <p>Record approval of projects over period</p> <p>Promote the Essential Home Repair program to landlords and housing providers to increase awareness and utilization of the program</p>	Community Development Department

### Goal #8: Strengthen Linkages between Transportation and Jobs

As indicated in Goal #2, residents of Clayton County often do not live near job opportunities. This goal is to strengthen linkages between transportation and jobs and thereby address the fair housing issue of disparities in access to opportunity. The County intends to promote Transportation Oriented Developments (TODs) throughout the County by supporting midrise density, mixed uses, along commercial corridors and already established MARTA bus routes, continue to advocate for and encourage MARTA to extend the rail line to Clayton County, forge stronger communication channels with Aerotropolis (an office/industrial park near Hartfield-Jackson International Airport) and update the County Transportation Plan with a robust public participation component.

Goal #8	Strategy	Fair Housing Issues	Contributing Factors	Timeframe for Action	Measure and Achievement	Responsible Program Participant(s)
Strengthen linkages between transportation and jobs	A. Promote Transportation Oriented Developments (TODs) throughout the County by supporting midrise density, mixed uses, along commercial corridors and already established MARTA Bus routes	Disparities in Access to Opportunity	The availability, type, frequency, and reliability of public transportation	Present – 12 months	Transportation Oriented Developments (TOD)  Undertake one TOD in 48 months	Economic Development Department; Transportation and Development Department; Community Development Department

	B. Continue to advocate for and encourage MARTA to extend the rail line to Clayton County			Present – 12 months	Recognition of need  Persuade MARTA to recognize need for rail in Clayton County and take it under advisement in decision-making	Economic Development Department; Transportation and Development Department; Community Development Department
	C. Forge stronger communication channels with Aerotropolis to ensure a seat at the table during decision-making			12- 24 months	Open lines of communication  Establish Board of Commissioner's liaison with Aerotropolis; obtain progress reports from Atlanta Alliance	Economic Development Department; Transportation and Development Department; Community Development Department
	D. Update the County Transportation Plan with a robust public participation component			Present – 24 months	Updated Transportation Plan  Complete update in time period	Economic Development Department; Transportation and Development Department; Community Development Department