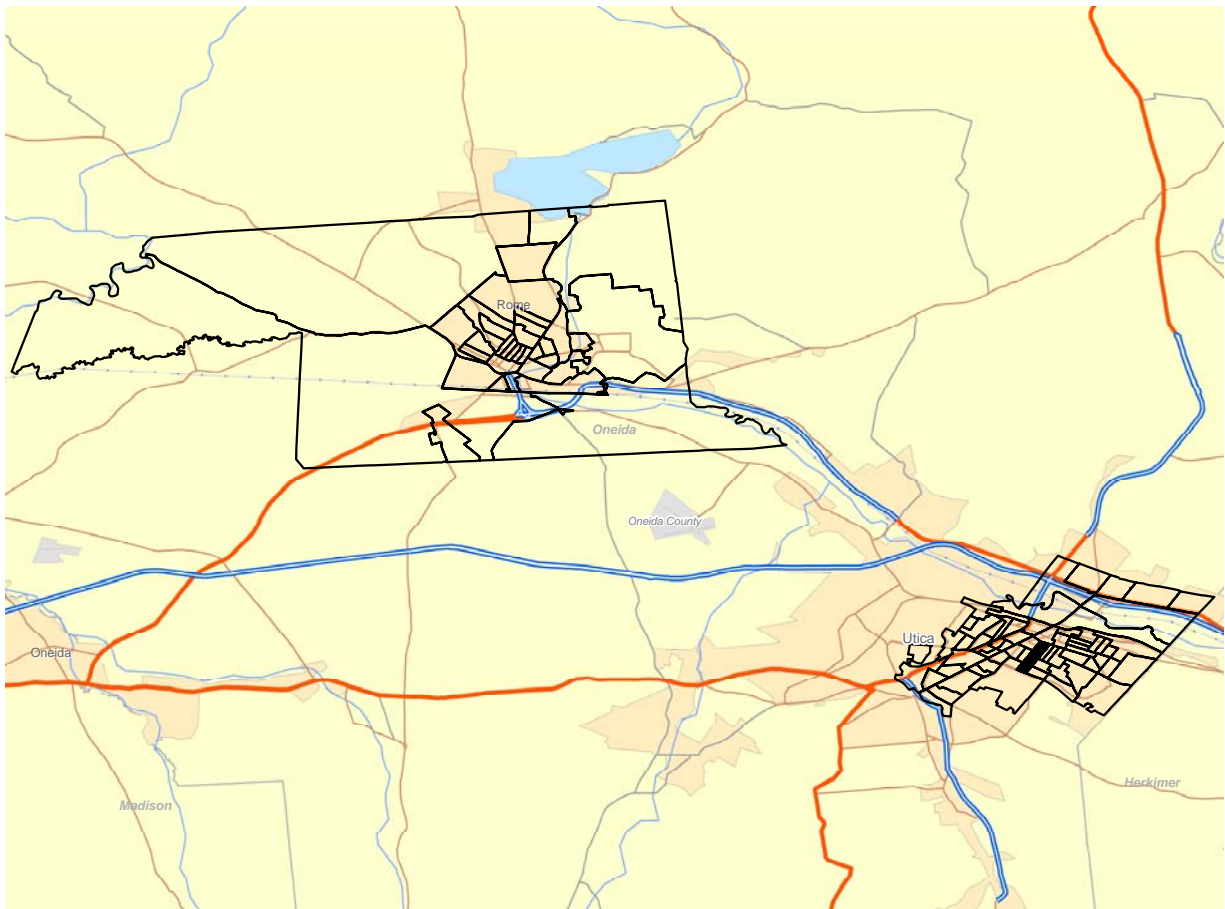


Analysis of Impediments To Fair Housing Choice

Rome and Utica, New York



Draft Report For Public Review

May 16, 2008

IF YOU FEEL THAT YOUR RIGHT TO FAIR HOUSING HAS BEEN VIOLATED

Persons who believe they have been discriminated against should contact The Fair Housing Council of Central New York

By calling 1-315-471-0420

By writing to:
Fair Housing Council of Central New York
327 W. Fayette Street
Mill Pond Landing
Syracuse, NY 13202

Or by visiting <http://www.cnyfairhousing.org>

Persons may also contact The New York Division of Human Rights.

By calling 1-888-392-3644.

By writing to:
New York State Division of Human Rights
Intake Division
One Fordham Plaza, 4th Floor
Bronx, NY 10458

Or by visiting: <http://www.dhr.state.ny.us/>

Analysis of Impediments To Fair Housing Choice

Prepared for the
Cities of Rome and Utica, New York

By:

Western Economic Services, LLC
212 SE 18th Avenue
Portland, OR 97214
(503) 239-9091
Toll-free: 1-866-937-9437
Fax: (503) 239-0236
E-mail: rgaudin@wes.info

Draft Report For Public Review

May 16, 2008



TABLE OF CONTENTS

	<u>Page</u>
Executive Summary	1
Section I. Introduction	5
Section II. Rome and Utica Area	9
Demographics in the Cities of Rome and Utica	9
Housing in the Cities of Rome and Utica	18
Section III. Lending Practices	25
Home Mortgage Disclosure Act Data Analysis	26
Section IV. Fair Housing Agencies and Programs	37
Major Fair Housing Agencies and Organizations	37
Regional Fair Housing Agencies and Organizations	39
Related National and Local Fair Housing Studies	42
Section V. Evaluation of the Fair Housing Profile	47
Complaint and Compliance Review	47
Housing Complaints	51
The 2008 Fair Housing Survey	54
The 2008 Fair Housing Forums	59
Section VI. Impediments and Suggested Actions	61
Overview of Findings	61
Impediments to Fair Housing Choice	61
Suggested Actions to Consider	62
Appendix A. Selected Census Data	65
Appendix B. HMDA Data	75
Appendix C. 2008 Fair Housing Survey Data	87

EXECUTIVE SUMMARY

The Federal Fair Housing Act of 1968 made it illegal to discriminate in the area of housing because of a person's race, color, religion, or national origin. Sex was added as a protected class in the 1970s. In 1988, the Fair Housing Amendments Act added familial status and disability to the list, making a total of seven federally protected classes. Familial status includes parents or legal guardians of minors under the age of 18. Disability covers physical and mental disabilities as well as people with AIDS or alcoholism.

In addition to prohibiting discrimination based upon federal laws, New York Fair Housing Law further prohibits discrimination based on marital status, age, sexual orientation and military status¹.

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

As part of the Consolidated Planning process, and as a requirement for receiving HUD formula grant funding, entitlement jurisdictions are required to submit to HUD certification that they are **affirmatively furthering fair housing**. This certification comprises three steps:

- Complete an Analysis of Impediments to Fair Housing Choice (AI);
- Take actions to overcome the effects of any impediments identified through the analysis; and
- Maintain records reflecting the analysis and actions taken.

HUD defines impediments to fair housing choice in terms of their applicability to state and federal law, such as:

- Any actions, omissions, or decisions taken which restrict housing choices or the availability of housing choice because of race, creed, color, religion, disability, national origin, sexual orientation, military status, age, sex, marital status, or familial status or
- Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choice for these classes.

OVERVIEW OF FINDINGS

Racial minorities in the Rome and Utica region account for 17.5 percent of the population, with the African-American population comprising the bulk of those persons classified as racial minorities. The African-American population is not distributed evenly within the Rome and Utica region, with several areas experiencing disproportionately high

¹ N.Y. Executive Law, Article 15, Human Rights Law
http://www.dhr.state.ny.us/Law_anf_Regulations_unlawful_discriminatory.html

concentrations of African-Americans, especially in Utica. The same is true for the spatial distribution for the population in poverty, which is clustered into areas with a disproportionately high degree of poverty. This is not true for the region's Hispanic population, which, with the exception of four areas, is spread uniformly across the region. The percentage of households with a cost burden is comparable to the national average, with the notable exception of severely cost burdened renter occupied households, which exceeds the national average by five percentage points.

Racial and ethnic minorities tend to face much higher rates of denials for homeownership mortgage loan applications than whites. This is true even when level of income is taken into account. For all racial groups, the most cited reason for denial is credit history, with debt-to-income the second most cited reason reported. Applications to sub-prime lenders increased more quickly than the applications to traditional lenders, but still only accounted for 7.5 percent of total applications. Racial and ethnic minorities also have a higher proportion of high annual percentage rate loans, also characterized as predatory loans, than whites, which may increase the financial strain on this population.

Housing Complaint data received from HUD and the New York Division of Human Rights indicate there is housing discrimination in the Rome and Utica area. Discriminatory actions most frequently occur in the rental market and are associated with the refusal to rent and eviction or threatened eviction. The protected classes most cited as being discriminated against are race, disability and familial status.

The 2008 Fair Housing Survey found a lack of understanding about fair housing law, who is protected under the law and what to do in the event of an alleged fair housing violation. The survey also found fair housing dialogue is often confused with affordable housing, landlord/tenant issues and local politics. As a result, more education and outreach is necessary to affirmatively further fair housing.

IDENTIFIED IMPEDIMENTS TO FAIR HOUSING CHOICE

The 2008 Analysis of Impediments to Fair Housing Choice for the Cities of Rome and Utica uncovered several issues that can be considered to be barriers to affirmatively furthering fair housing and impediments to fair housing choice. These are as follows:

1. Lack of an adequate fair housing service delivery system
 - a. Limited use of existing capacity for conducting outreach and education activities
 - b. Lack of knowledge by experts and stakeholders of where to refer people who have indicated that they felt a victim of an unfair housing practice
 - c. Lack of access to fair housing complaint system
 - d. Lack of testing and enforcement capacity and activities, due to lack of use of existing capacity (Fair Housing Council of Central New York)
2. Lack of public awareness of fair housing rights and fair housing services
 - a. Lack of understanding of State and Federal fair housing law
 - i. Some are uncertain of who or what groups are protected under the law

- ii. Uncertain or lack of knowledge of what actions constitute violations of fair housing law
- b. Lack of uniformity in referrals for prospective victims of housing discrimination
- 3. High home mortgage loan denial rates for selected minorities, particularly for Blacks and Hispanics
 - a. Especially high denial rates in sub-prime mortgage lending markets
 - b. Concerned about originations in minority areas
- 4. Some unlawful discrimination appears to be occurring in rental markets
 - a. Discriminatory terms and conditions in rental markets
- 5. Abuse of landlord/tenant law
 - a. Perceived reluctance to make requested or necessary repairs
 - b. With less than affordable rental markets, tenants tend to have few choices for recourse
- 6. Significant confusion about and the difference between:
 - a. Affirmatively furthering fair housing (E&O, testing, enforcement)
 - b. Promotion and provision of available and affordable housing
 - i. Not directly a housing discrimination issue as it does not relate to constraining choice *because* of protected class status; choice is curtailed due to housing price/household income considerations
 - c. New York landlord tenant law
 - i. Rights and obligations of both providers and consumers of housing
 - ii. Lack of understanding of responsibilities of both parties to rental agreement

SUGGESTED ACTIONS FOR THE CITIES OF ROME AND UTICA TO CONSIDER

- 1. Assist in improving fair housing delivery system
 - a. Consider providing periodic or short-term temporary access to private office space for a part-time fair housing walk-in center, manned by a representative of the Fair Housing Center of Central New York (FHC).
 - i. Such as one half day per month.
 - b. Arrange for on-site fair housing training from the FHC
 - i. Have City staff receive training first
 - c. Design a simple set of instructions for uniform fair housing referral system
 - i. Include contact numbers, definitions of discriminatory actions and what represents protected class status.
 - ii. Distribute these materials to individuals, advocates, interested parties, and government entities throughout the region
 - d. Assist in orchestrating fair housing training sessions from the FHC within the two cities
 - i. Target city zoning, planning and housing and community development staff so that they may become more familiar with fair housing
 - ii. Expand to developers, builders, and landlords throughout the two cities so that they too can become more familiar with Fair Housing

2. Assist in improving public awareness of fair housing and land/lord tenant law
 - a. Acquire and distribute fair housing flyers and pamphlets, including materials about landlord tenant law, to social service agencies, residential rental property agencies, faith-based organizations, Hispanic advocate and service agencies, and other entities
 - i. Some materials should represent posters highlighting the fair housing referral system, discriminatory actions, and protected class status
 - b. Coordinate and consult with the FHC as to their experience to best present prospective fair housing sessions designed for the public and solicit stakeholders and others to join in with raising public awareness
3. Consider enhancing first-time homebuyer training program
 - a. Conduct outreach and education for prospective homebuyers
 - b. Address establishing good credit and the wise use of credit
 - i. Include discussion that helps to make prospective credit consumers aware of what constitutes predatory lending practices
4. Incorporate more formalized elements of fair housing planning in Consolidated Plan
 - a. Devote chapter or section of proposed actions, with milestones and guidelines
 - b. Include Fair Housing in public review process for Consolidated Plan
 - c. Publish the Analysis of Impediments to Fair Housing Choice

SECTION I. INTRODUCTION

BACKGROUND

The Federal Fair Housing Act of 1968 made it illegal to discriminate in the area of housing because of a person's race, color, religion, or national origin. Sex was added as a protected class in the 1970s. In 1988, the Fair Housing Amendments Act added familial status and disability to the list, making a total of seven federally protected classes. Familial status includes parents or legal guardians of minors under the age of 18. Disability covers physical and mental disabilities as well as people with AIDS or alcoholism. Federal Fair Housing Statutes are largely covered by the following three pieces of legislation:

- The United States Fair Housing Act
- The United States Housing Amendments Act
- The United States Americans with Disabilities Act

In addition to prohibiting discrimination based upon the federal laws above, New York Fair Housing Law prohibits discrimination based on marital status, sexual orientation and military status². Units of local government may also pass additional fair housing laws extending protection to additional groups of persons, but neither Rome nor Utica do so.

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

WHY ASSESS FAIR HOUSING?

In 1994, HUD published a rule consolidating its housing and community development programs into a single plan called the Consolidated Plan for Housing and Community Development. The consolidated programs are the Community Development Block Grant program (CDBG), HOME Investment Partnerships Program (HOME), Emergency Shelter Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA).

As a part of the Consolidated Planning process, entitlement jurisdictions are required to submit to HUD certification that they are **affirmatively furthering fair housing**. As such entitlement jurisdictions, the Cities of Rome and Utica are required to submit to HUD certification that they are affirmatively furthering fair housing. This certification has three elements, which require Rome and Utica to:

² N.Y. Executive Law, Article 15, Human Rights Law
http://www.dhr.state.ny.us/Law%20&%20Regulations_unlawful_discriminatory.html

- Complete an Analysis of Impediments to Fair Housing Choice (AI);
- Take actions to overcome the effects of any impediments identified through the analysis; and,
- Maintain records reflecting the analysis and actions taken.

HUD defines impediments to fair housing choice in terms of their applicability to state and federal law, such as:

- Any actions, omissions, or decisions taken which restrict housing choices or the availability of housing choice because of race, creed, color, religion, disability, national origin, sexual orientation, military status, age, sex, marital status, or familial status
- Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choice for these classes.

HUD interprets these broad objectives to mean:

- Analyzing and working to eliminate housing discrimination in the jurisdiction;
- Promoting fair housing choice for all persons;
- Providing opportunities for racially and ethnically inclusive patterns of housing occupancy;
- Promoting housing that is physically accessible to, and usable by, all persons, particularly persons with disabilities; and
- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act.³

Consequently, the purpose of this report is to document findings of the Analysis of Impediments to Fair Housing Choice and suggest actions that the Cities of Rome and Utica can consider in working toward overcoming the identified impediments.

COMMITMENT TO FAIR HOUSING

In accordance with the applicable statutes and the regulations governing the Consolidated Plan regulations, the Cities of Rome and Utica certify they will **affirmatively further fair housing**. This means that the jurisdictions have conducted an analysis of impediments to fair housing choice within the region, will take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

RESEARCH METHODOLOGY

The Analysis of Impediments is a thorough examination of a variety of sources related to housing, housing choice, and protected class status. It involves primary research, which is the collection and analysis of raw data, and secondary research, which entails the review of existing data and studies. This approach, combining both qualitative and quantitative research components, provides a rich data set for analyzing impediments to fair housing

³ *Fair Housing Planning Guide*. U.S. Department of Housing and Urban Development. March 1996, pg.1-3.

choice. The following narrative provides a brief description of the research methodologies and data sources employed for the 2008 AI.

Much of the baseline secondary data and quantitative information providing a picture of the Rome and Utica housing marketplace were drawn from the 2000 Census and intercensal estimates. These data included Census population information, personal income, poverty estimates, housing units by tenure, cost burdens, housing conditions, and a variety of other data depicting the socio-economic context in which housing choices are made by consumers. In addition, other interesting data was evaluated for the Rome and Utica Analysis of Impediments.

HOME MORTGAGE DISCLOSURE ACT DATA

The Home Mortgage Disclosure Act was enacted by Congress in 1975 and amended from 1988 to 1991. It is intended to provide the public with loan data that can be used to determine whether financial institutions are serving the housing credit needs of their communities and to assist in identifying possible discriminatory lending patterns. Financial institutions are required to publicly disclose data regarding loan applications, along with information concerning their loan originations and purchases. HMDA requires these lenders to report the race and sex of mortgage applicants. For this analysis, HMDA data covering the period from 2001 through 2006 was analyzed, with the comparison of denial rates by race and ethnicity of applicants a key research objective. Furthermore, the types of lending institutions were separated by the primary type of lending activities in which they engaged, such as subprime lenders versus all other lenders. Analysis of loan characterized by high annual percentage rate terms was also conducted, by race, ethnicity and gender.

FAIR HOUSING COMPLAINT DATA

Fair housing complaint data for the two cities covering the period from 2000 through 2006 was received from HUD and the New York Division of Human Rights. The information included basis of complaint, issue pursuant to the complaint, and closure status of the alleged fair housing violation. This allowed inspection of the relative degree and frequency of certain types of unfair housing practices seen in the Cities of Rome and Utica.

2008 FAIR HOUSING SURVEY

One of the methods HUD recommends to gather public input about perceived impediments to fair housing is to conduct telephone interviews. The Cities of Rome and Utica selected a list of about 80 key stakeholders to participate in the 2008 Fair Housing Interviews. The list included elected officials, representatives of state and local government, as well as community based organizations and activists. Prospective participants were also drawn from experts in areas such as residential and commercial building codes and regulations; state, local, and federal occupancy standards; residential health and safety codes and regulations (structural, water & sewer); state tax law and low income tax

waivers; state and local land use planning; banking and insurance laws and regulations; real estate development; real estate sales and management; renter rights and obligations; civil rights, fair housing, disability, social service, and other advocacy organizations; and similar housing providers. Reaching such an experienced group allowed for qualitative analysis of general views and trends experienced throughout the area, as well as gaining expert knowledge of fair housing issues in both cities.

A letter dually signed by the Mayor of Rome, James F. Brown, and the Mayor of Utica, David R. Roefaro, was sent to each prospective respondent on the stakeholder list introducing the 2008 Analysis of Impediments to Fair Housing Choice Study. The letter described the types of information being sought and guaranteed anonymity for each respondent. The letter also discussed the purpose of the study, what would be examined, and why the respondent's participation was important.

Within one week of the respondents' receipt of the letter the interviews were initiated. The interview was a blend of both closed and open-ended questions, inquiring about knowledge of fair housing law, protected classes, and concerns about fair housing in the Cities of Rome and Utica.

The interview process also requested knowledge of violations of fair housing law, situations in which discrimination was exhibited, and the respondent's sense of barriers or constraints to affirmatively furthering fair housing, including their knowledge and understanding of state and local policies that may inhibit affirmatively furthering fair housing. Each respondent was asked about the level and quality of fair housing services needed in the Cities of Rome and Utica, specifically targeting the needs for education, outreach, testing, and enforcement. The findings of these surveys proved to be both useful and insightful.

THE 2008 FAIR HOUSING FORUMS

An additional component to the community outreach efforts included a set of public input meetings. Entitled the 2008 Fair Housing Forums, these meetings were designed to present preliminary findings of quantitative and qualitative research to the public. This presentation of preliminary findings was approximately 60 minutes in length. These meetings afforded interested parties an opportunity to offer perspective and commentary about their own personal views of fair housing and what the Cities of Rome and Utica could or should be doing to better affirmatively further fair housing.

The Rome forum was advertised in Rome Sentinel, many people were invited to attend by direct solicitation via e-mail or telephone call. Additional invitations involved verbal contact during each of the completed 2008 Fair Housing Interviews. Respondents were alerted to the scheduled forums and sent a flyer announcing the meeting locations and times. Flyers and posters also were distributed by City staff to organizations and housing development agencies.

SECTION II. THE CITIES OF ROME AND UTICA

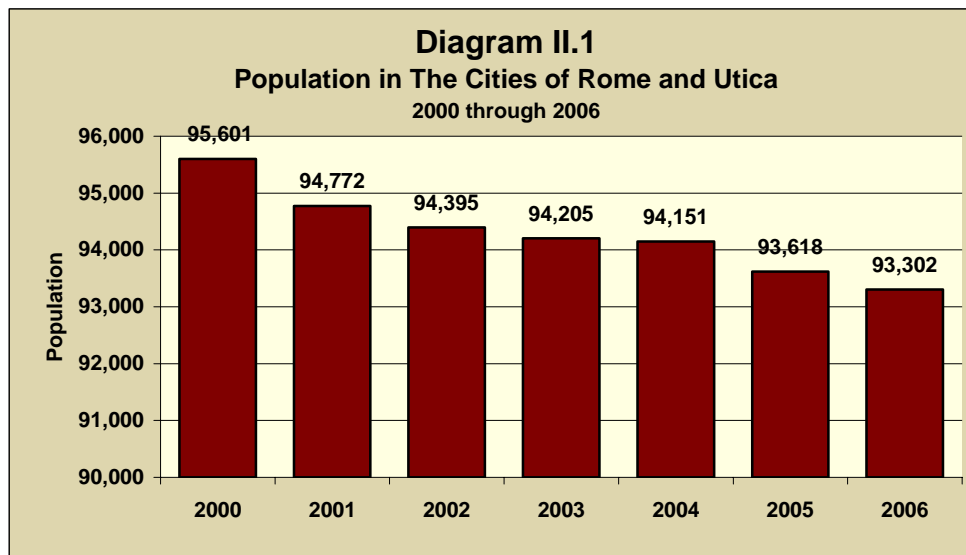
INTRODUCTION

This section presents general demographic and housing information collected for the Cities of Rome and Utica from the 2000 Decennial Census and most recent intercensal estimates. The following section describes a broad range of socioeconomic characteristics for the two cities including population, race and ethnicity, disability, poverty, low income concentrations and housing conditions. These data illustrate the underlying conditions that shape housing market behavior and highlight potential causes of impediments to fair housing choice.

DEMOGRAPHICS IN THE CITIES OF ROME AND UTICA

POPULATION

On June 28, 2007, the U.S. Census Bureau released the most currently available and recent estimates of the nations population by county and city, for the period ending July 1, 2006. The total population of the Cities of Utica and Rome fell from 95,601 in 2000 to 93,302 in 2006, which represents a decrease of 2.4 percent. Population has been steadily decreasing since the 2000 census, with a brief slowdown in reduction rates from 2002 to 2004, but again trending downward from 2005 until the present, as seen in Diagram II.1 below.

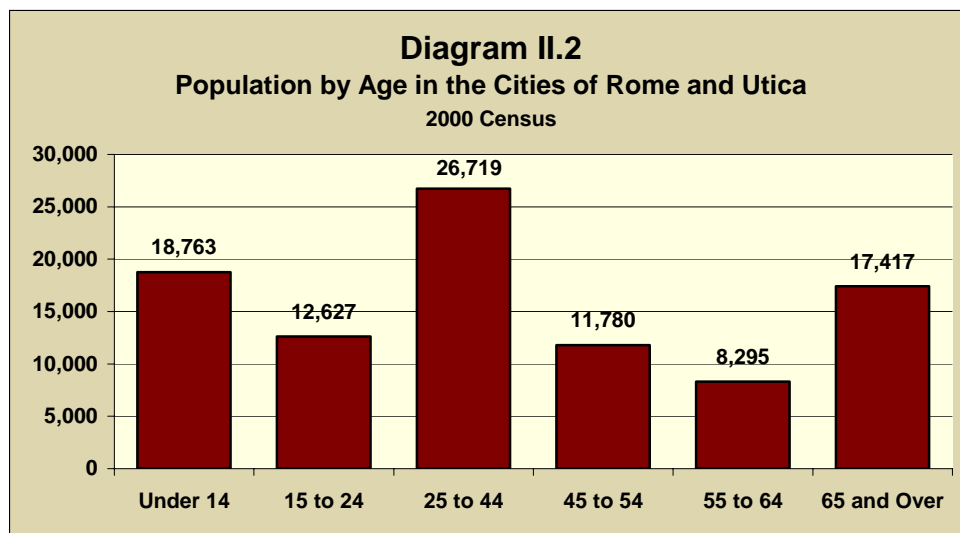


The population in Rome fell from 34,950 in 2000 to 34,220 in 2006, or by 2.09 percent and the population in Utica fell from 60,651 to 59,082, or by 2.59 percent, as reported in Table II.1, on the following page.

Table II.1
2000 Census and Intercensal Population Estimates
for the Cities of Rome and Utica
Census 2000 SF1 Data and Intercensal Estimates

Place	Census 2000	July 2001 Est.	July 2002 Est.	July 2003 Est.	July 2004 Est.	July 2005 Est.	July 2006 Est.	% Change 00-06
Rome	34,950	34,668	34,544	34,497	34,471	34,330	34,220	-2.09
Utica	60,651	60,104	59,851	59,708	59,680	59,288	59,082	-2.59
Total	95,601	94,772	94,395	94,205	94,151	93,618	93,302	-2.40

Diagram II.2, below, shows the population distribution by age for the Cities of Rome and Utica. The largest age group, or age cohort, consists of people between the ages of 25 to 44 years old, with 26,719 people, which represents 27.9 percent of the total population. This age cohort represents an important segment of the labor force. The second largest age cohort consists of those persons under the age of 14, comprising 18,763 persons. Detailed data of gender by age group can be found in Appendix A, Table A.1.



RACE AND ETHNICITY

Population by ethnicity for the Cities of Rome and Utica can be found in Table II.2, at right. Total Hispanic population reached 5,158 persons, which represented 5.4 percent of the total population. The city of Rome had a Hispanic population of 1,648, or 4.7 percent of total population and Utica's Hispanic population represented 5.8 percent of the total population, comprising 3,510 persons.

Table II.2
Population By Ethnicity
in the Cities of Rome and Utica
Census 2000 SF1 Data

Place	Hispanic	Non-Hispanic	Total	Percent Hispanic
Rome	1,648	33,302	34,950	4.7%
Utica	3,510	57,141	60,651	5.8%
Total	5,158	90,443	95,601	5.4%

Population by race is presented in Table II.3 below. As reported in the 2000 Census, whites were the largest racial block, consisting of 78,870 persons and representing 82.5 percent of the total population. Black or African-Americans were the second most populous race, consisting of 10,488 persons, or 11.0 percent of total population.

Within the Cities of Rome and Utica the spatial distribution of these racial groups is not uniform. Some areas have high concentration of minority populations and others have almost no minority representation. For the purposes of planning, HUD defines an area as having a disproportionate share if a particular group comprises more than 10 percentage points above the jurisdiction's average. To examine if there existed geographic areas that had disproportionate shares of minority or ethnic populations, geographic maps presenting the distribution of racial and ethnic populations by census block group were created and are presented on the following page.

Table II.3
Population By Race in the Cities of Rome and Utica
Census 2000 SF1 Data

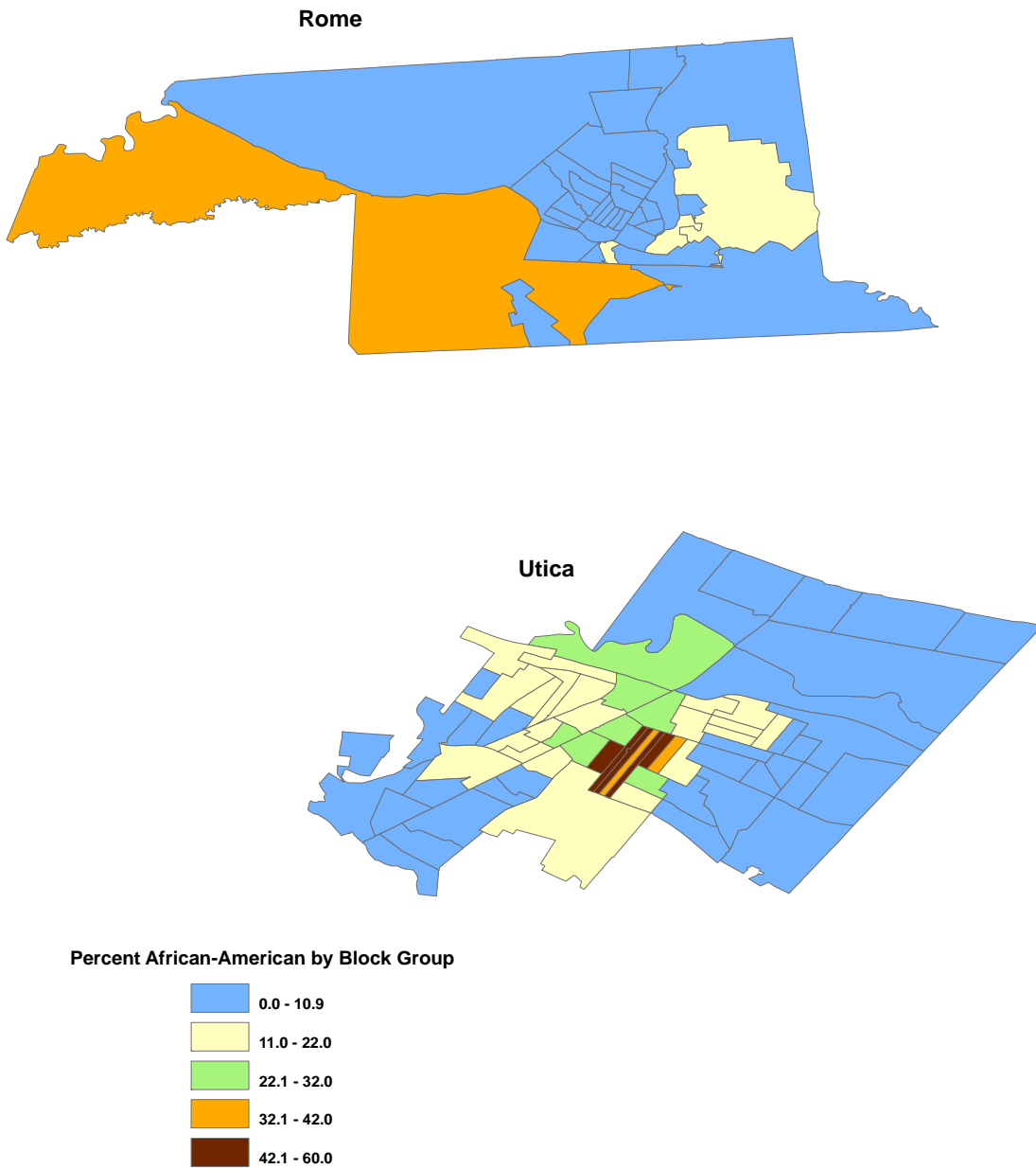
Place	Rome	Utica	Total	Percent of Total
White	30,704	48,166	78,870	82.5%
Black or African American	2,650	7,838	10,488	11.0%
American Indian or Alaskan Native	93	170	263	0.3%
Asian	309	1,341	1,650	1.7%
Native Hawaiian and Other Pacific Islander	6	29	35	0.0%
Other	473	1,309	1,782	1.9%
Two or More Races	715	1,798	2,513	2.6%
Total	34,950	60,651	95,601	100.0%
Hispanic	1,648	3,510	5,158	5.4%

The jurisdiction average for African-Americans is 11.0 percent of total population. For a geographic area to have a disproportionate share of African-American persons, 21.0 percent or above of the total population must be Black. As seen in Map II.1, on the following page both Rome and Utica have Census Block Groups with disproportionate shares of African-American populations.

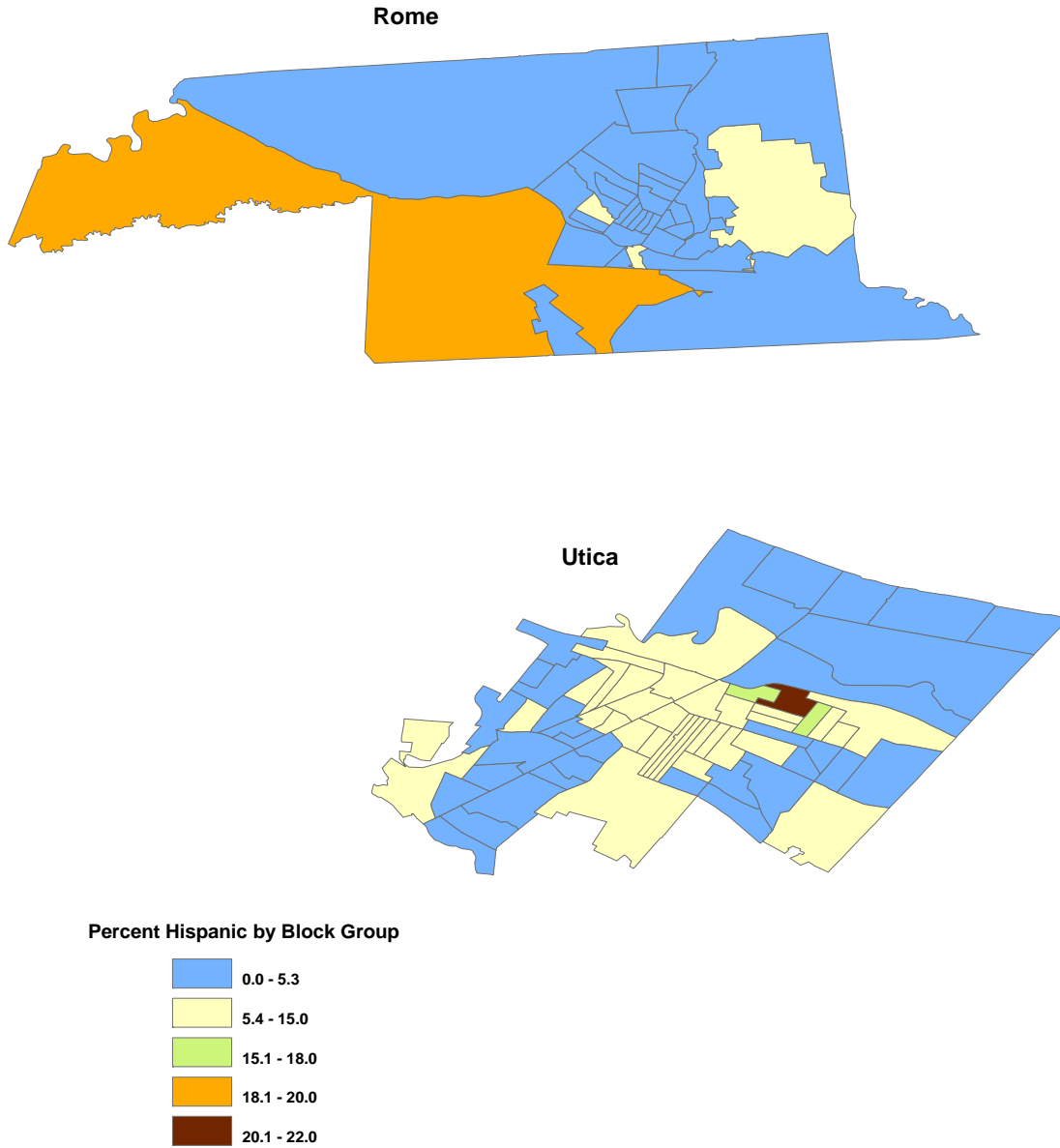
In fact, of the 101 block groups that make up the Cities of Rome and Utica, 15 have a disproportionate share of African-Americans, with 14 of those block groups located in Utica. Utica also has the block groups with the highest concentrations of African-Americans and has 6 block groups with over 42.1 percent of the population comprised of African-Americans. Detailed data on African-American population by census block group can be found in Appendix Tables A.2 and A.3.

The same spatial analysis was conducted for the Hispanic population, as seen in Map II.2 on page 13. The jurisdiction average for Hispanics was 5.4 percent of total population. For a geographic area to have a disproportionate share of Hispanic persons, 15.4 percent or above of the total population must be Hispanic. Both Rome and Utica have areas with a disproportionate share of Hispanics, but only 3 of the 101 Block Groups indicate this attribute. One Utica Block Group had more than 20 percent of the population comprised of Hispanic persons. Detailed data on Hispanic population by census block group can be found in Appendix A, Tables A.2 and A.3.

Map II.1
Percent of Population that is African-American in the Cities of Rome and Utica
 2000 Census SF1 Data by Census Block Group



Map II.2
Percent of Population that is Hispanic in the Cities of Rome and Utica
2000 Census SF1 Data by Census Block Group



DISABILITY STATUS

Disability is defined by the Census Bureau as a lasting physical, mental, or emotional condition that makes it difficult for a person to do activities or impedes them from being able to go outside the home alone or to work.⁴

The disabled population in the Cities of Rome and Utica, as derived from the 1 in 6 sample, or SF3 data,⁵ comprise 25.1 percent of the non-institutionalized population the age of 5 or older. Persons between the ages of 21 and 64 comprise 61.5 percent of the total disabled population in the Cities of Rome and Utica. The disabled population in Rome is comprised of 7,041 persons, which account for 23.9 percent of the population aged five and older. Utica’s disabled population numbers 14,140 persons and accounts for 25.8 percent of the population aged five and older. The national disability rate for non-institutionalized persons aged five or older was 19.3 percent at the time the 2000 Census was taken. Consequently, both Rome and Utica have a disability rate substantially higher than the national average, as seen in Table II.4, below.

Table II.4
Disabled Population in the Cities of Rome and Utica:
Ages 5 Years and Older
Census 2000 SF3 Data

Place	5 to 15	16 to 20	21 to 64	65 to 74	75 or Older	Total	Disability Rate
Rome	327	305	4,295	913	1,201	7,041	23.9%
Utica	576	615	8,734	1,649	2,566	14,140	25.8%
Total	903	920	13,029	2,562	3,767	21,181	25.1%

While Table II.4 reports the total number of disabled persons, persons may have one or more than one disability. Table II.5, on the following page, presents a tally of the total number of disabilities seen in the population of the Cities of Rome and Utica.

⁴ The data on disability status were derived from answers to long-form questionnaire items 16 and 17 for the 1-in-6 sample. Item 16 asked about the existence of the following long-lasting conditions: (a) blindness, deafness, or a severe vision or hearing impairment, (sensory disability) and (b) a condition that substantially limits one or more basic physical activities such as walking, climbing stairs, reaching, lifting, or carrying (physical disability). Item 16 was asked of a sample of the population five years old and over. Item 17 asked if the individual had a physical, mental, or emotional condition lasting 6 months or more that made it difficult to perform certain activities. The four activity categories were: (a) learning, remembering, or concentrating (mental disability); (b) dressing, bathing, or getting around inside the home (self-care disability); (c) going outside the home alone to shop or visit a doctor’s office (going outside the home disability); and (d) working at a job or business (employment disability). Categories 17a and 17b were asked of a sample of the population five years old and over; 17c and 17d were asked of a sample of the population 16 years old and over. For data products which use the items individually, the following terms are used: sensory disability for 16a, physical disability for 16b, mental disability for 17a, self-care disability for 17b, going outside the home disability for 17c, and employment disability for 17d. For data products which use a disability status indicator, individuals were classified as having a disability if any of the following three conditions was true: (1) they were five years old and over and had a response of "yes" to a sensory, physical, mental or self-care disability; (2) they were 16 years old and over and had a response of "yes" to going outside the home disability; or (3) they were 16 to 64 years old and had a response of "yes" to employment disability.

⁵ Data from summary file 3, or SF 3, data files are sample data and are subject to sampling error. As such, totals presented in the SF3 data may not sum to be equal to the SF1 data, the 100 percent sample.

Table II.5
A Tally of Total Disabilities
in the Cities of Rome and Utica
Census 2000 SF3 Data

Age	Rome	Utica	Total
Total	13,188	26,388	39,576
Sensory Disability			
Age 5 - 15	47	107	154
Age 16 - 64	745	1,195	1,940
Age 65 and Older	608	1,351	1,959
Total	1,400	2,653	4,053
Physical Disability			
Age 5 - 15	43	82	125
Age 16 - 64	2,027	3,964	5,991
Age 65 and Older	1,290	2,572	3,862
Total	3,360	6,618	9,978
Mental Disability			
Age 5 - 15	262	476	738
Age 16 - 64	1,315	2,392	3,707
Age 65 and Older	444	891	1,335
Total	2,021	3,759	5,780
Self-Care Disability			
Age 5 - 15	54	73	127
Age 16 - 64	586	1,102	1,688
Age 65 and Older	358	949	1,307
Total	998	2,124	3,122
Go-Outside Disability			
Age 16- 64	1,536	3,306	4,842
Age 65 and Older	1,022	2,258	3,280
Total	2,558	5,564	8,122
Employment Disability			
Age 16- 64	2,851	5,670	8,521

In the Cities of Rome and Utica, there were 9,978 reported physical disabilities, which represent 25 percent of all disabilities tallied. The second most frequently reported disability is employment disability, with 8,521 persons having this type of disability, or 21 percent of all reported disabilities. Go–outside disability is the third most frequently cited disability, with 8,122 cases, representing 21 percent of the total disabilities.

FOREIGN BORN POPULATION

The Cities of Rome and Utica have experienced significant in-migration of eastern European populations. To aid in documenting this, the U.S. Census collects information on the place of birth for the foreign born population. At the time of the 2000 census, there were 8,575 foreign born persons in the Cities of Rome and Utica, as seen in Table II.6, on the following page.

For the area as a whole, 5,864 foreign born persons came from Europe, with more than 91 percent of this population electing to reside in Utica. While the European immigrants represent 68.4 percent of the foreign born population, 2,632 persons came from Bosnia and Herzegovina. In fact, 98.6 percent of Bosnian and Herzegovina immigrants elected to reside in Utica. The Vietnamese population is the second largest group of foreign born persons in Utica with 819 individuals.

In Rome, the largest single group of foreign born immigrants, was listed as “other” from the Americas, with 291 immigrants. The foreign born population from Italy was the second largest group with 173 individuals and persons from the Dominican Republic were the third largest group with 133 persons.

Foreign born residents account for 9.0 percent of total population in the cities of Rome and Utica. In Rome, persons of foreign birth account for 3.8 percent of total population, where as in Utica, they account for 7.6 percent of the total population. Persons from Bosnia and Herzegovina make up 4.3 percent of the total population in Utica.

The influx of foreign born residents is helping to offset the effects of the steady decrease in population Rome and Utica has seen over the past two decades.

LOW INCOME CONCENTRATIONS

The majority of households in the Cities of Rome and Utica have an income of less than \$35,000 dollars, almost 60 percent of all households. In Utica, 10,356 households earned less than \$20,000, which accounts for 41.2 percent of total households. In Rome, 4,027 households earn less than \$20,000, which is 29.5 percent of the households. On the other end of the income range, 13.0 percent of households in Rome earn \$75,000

Table II.6
Place of Birth for Foreign Born Population
Census 2000 SF1 Data

Country	Rome	Utica	Total
Total	1,344	7,231	8,575

Europe			
Bosnia and Herzegovina	36	2,596	2,632
Belarus	6	602	608
Ukraine	0	461	461
Italy	173	440	613
Poland	40	253	293
Russia	0	244	244
Germany	100	193	293
Rest of Europe	169	551	720
Total	524	5,340	5,864
Percent	39.0%	73.8%	68.4%

Asia			
Vietnam	16	819	835
China	35	74	109
Japan	18	59	77
Lebanon	0	57	57
India	43	53	96
Korea	43	41	84
Other	96	232	328
Total	251	1,335	1,586
Percent	18.7%	18.5%	18.5%

Africa			
Total	26	43	69
Percent	1.9%	0.6%	0.8%

Oceania			
Total	6	0	6
Percent	0.4%	0.0%	0.1%

Americas			
Jamaica	53	94	147
Dominican Republic	133	76	209
Chile	0	32	32
Mexico	17	19	36
Barbados	43	11	54
Colombia	57	8	65
Other	234	273	507
Total	537	513	1,050
Percent	40.0%	7.1%	12.2%

dollars or more, compared to 8.8 percent earning the same amount in Utica. This data is presented in Table II.7 below.

Table II.7
Number of Households by Household Income Range
in the Cities of Rome and Utica
 Census 2000 SF3 Data

Place	Less Than 19,999	20,000 to 34,999	35,000 to 49,999	50,000 to 74,999	75,000 to 99,999	100,000 and Over	Total
Rome	4,027	3,016	2,386	2,462	970	792	13,653
Utica	10,356	5,742	3,631	3,145	1,249	970	25,093
Total	14,383	8,758	6,017	5,607	2,219	1,762	38,746
Percent	37.1%	22.6%	15.5%	14.5%	5.7%	4.5%	100.0%

POVERTY IN ROME AND UTICA

The Census Bureau uses a set of income thresholds that vary by family size and composition to determine who is poor. If a family's total income is less than that family's threshold, then that family, and every individual in it, is considered poor. The poverty thresholds do not vary geographically, but they are updated annually for inflation using the Consumer Price Index (CPI-U). The official poverty definition counts money income before taxes and does not include capital gains and non-cash benefits (such as public housing, Medicaid, and food stamps). Poverty is not defined for people in military barracks, institutional group quarters, or for unrelated individuals under age 15 (such as foster children). These groups are excluded from the poverty universe; that is, they are considered neither as "poor" nor as "nonpoor."

In the Rome and Utica study area, the poverty rate is 21.1 percent. This is much higher than the national average of approximately 12.4 percent. The poverty rate in Rome is 15.0 percent, significantly lower than the 24.5 percent poverty rate seen in Utica. For both Rome and Utica the distribution of individuals in poverty within each age group is very similar. In both cities, the population in poverty who are classified as elderly accounts for around 8.6 percent of the population. The age cohort comprised of individuals between 18 and 64 makes up 54.3 percent of individuals in poverty in Rome and 52.1 percent of individuals in poverty in Utica. In both Cities, persons younger than 18 comprise 38.0 percent of the total population in poverty. This data can be seen in Table II.8, below.

Table II.8
Individuals in Poverty by Age in the Cities of Rome and Utica
 Census 2000 SF3 Data

Place	Age 0 - 17	Age 18 - 64	Age 65 and Older	Total	Poverty Rate
Rome	1,750	2,570	408	4,728	15.0%
Utica	5,535	7,388	1,231	14,154	24.5%
Total	7,285	9,958	1,639	18,882	21.1%

Similar to the discussion of race and ethnicity, the geographic distribution of individuals in poverty for the Cities of Rome and Utica is presented by Census Block Group in Map II.3 on the following page. The jurisdiction average for individuals in poverty is 21.1 percent, and for a block group to be considered to have a disproportionate share of individuals in poverty it must have a poverty rate of 31.1 percent or higher.

Of the 101 census block groups that make up the Cities of Rome and Utica, 50 are considered to have a disproportionate share of individuals in poverty. Four block groups have poverty rates of 50.0 percent or higher, three of which are in Utica. In fact, Utica has 76.0 percent of all block groups with a disproportionate share of persons in poverty. These data indicate poverty in the region is localized in specific geographic areas, and not spread uniformly throughout the Cities of Rome and Utica region. Additional detailed data on poverty by Census Block Group can be found in Appendix A, Tables A.4 and A.5.

HOUSING IN THE CITIES OF ROME AND UTICA

The 2000 Census reported there where a total of 45,458 households in the Cities of Rome and Utica, of which 38,753 or 85.3 percent were occupied, as seen in Table II.9 at right. Rome had a total of 16,272 total housing units, of which 13,653 or 83.9 percent were occupied. Utica had 29,186 housing units, with 25,100 or 64.2 percent of them being occupied.

Table II.9
Households by Occupancy Status
in the Cities of Rome and Utica
Census 2000 SF1 Data

Place	Occupied	Vacant	Total
Rome	13,653	2,619	16,272
Utica	25,100	4,086	29,186
Total	38,753	6,705	45,458

Of the 38,753 occupied units, 20,053 were owner-occupied. This represents a homeownership rate of 51.7 percent in the Cities of Rome and Utica. As can be seen in Table II.10, at right, Rome had a higher rate of homeownership, 57.1 percent, compared to Utica's homeownership rate of 48.8 percent. Homeownership in both cities was substantially lower than the national average for the time, which was about 69 percent.

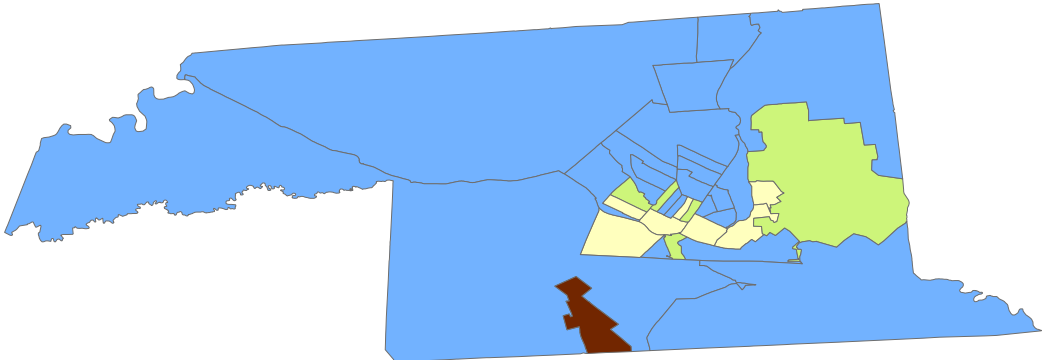
Table II.10
Occupied Housing by Tenure
in the Cities of Rome and Utica
Census 2000 SF1 Data

Place	Owner Occupied	Renter Occupied	Total	Homeownership rate
Rome	7,792	5,861	13,653	57.1%
Utica	12,261	12,839	25,100	48.8%
Total	20,053	18,700	38,753	51.7%

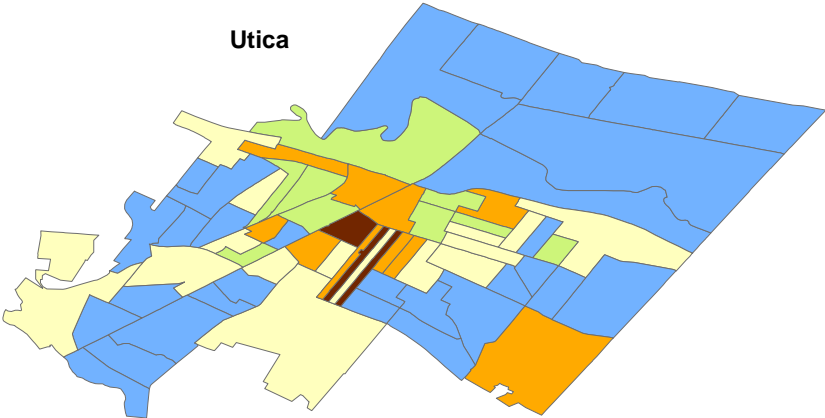
The disposition of vacant housing in the Cities of Rome and Utica is presented in Table II.11, on page 20. Vacant rental units comprise the largest group of vacant units, but in Rome, the largest segment of vacant housing is comprised of units used for "other", which accounts for 45.0 percent of total vacant units. The City of Utica has another 1,433 "other" vacant units. These may be of some concern, as these units are neither for sale nor for rent and are not available for use by householders. Such a large stock of "other" vacant housing may represent a blighting influence.

Map II.3
Percent of Population that is in Poverty in the Cities of Rome and Utica
2000 Census SF1 Data by Census Block Group

Rome



Utica



Poverty Rate by Census Block Group

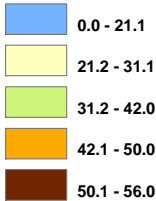


Table II.11
Disposition of Vacant Housing in the Cities of Rome and Utica
 Census 2000 SF1 Data

Place	For Rent Only	For Sale Only	Rented or Sold; Not Occupied	Seasonal, Recreational, or Occasional Use	For Migrant Workers	Other	Total
Rome	999	270	131	40	0	1,179	2,619
Utica	1,896	460	203	93	1	1,433	4,086
Total	2,895	730	334	133	1	2,612	6,705

In Rome, the large percentage of vacant units listed as “other” may be the result of the closure of Griffiss Air Force Base, and the inability of the housing market to incorporate the excess housing stock built for military service personal.

HOUSING CONDITIONS

While the 2000 Census does not report significant details regarding the physical condition of housing units, some information is reported, which pertains to the presence of overcrowding and the lack of complete plumbing and kitchen facilities.⁶

Overcrowding is defined as a residence having from one to 1.5 people per room, with severe overcrowding defined as having more that 1.5 people per room. As a percentage of owner-occupied housing units, both Rome and Utica have less than one percent of housing units classified as overcrowded, or severely overcrowded, as can be seen in Table II.12 below.

Table II.12
Over Crowding Status of Owner Occupied Housing Units
in the Cities of Rome and Utica
 Census 2000 SF3 Data

Place	No Overcrowding	Overcrowding	Severe Overcrowding	Total Occupied Housing Units
Rome	7,765	16	13	7,794
Utica	12,108	93	52	12,253
Total	19,873	109	65	20,047
Percent	99.1%	0.5%	0.3%	100.0%

However, renter occupied housing has slightly higher instances of overcrowding. In Rome, 2.2 percent of renter occupied housing units are classified as “overcrowded” and Utica has a slightly higher rate of 2.8 percent. Even in renter occupied housing units, the percentage of “severely overcrowded” units is less than one percent in both Rome and Utica, as can be

⁶ As per the Census Bureau, a housing unit is classified as lacking complete plumbing/kitchen facilities when any of the following plumbing facilities are not present in a housing unit: (1) hot and cold piped water, (2) a flush toilet, and (3) a bathtub or shower; and for kitchen facilities: (1) a sink with piped water, (2) a range, or cook top and oven; and (3) a refrigerator.

seen in Table II.13 below. Additional detailed data on this concept can be found in Appendix A, Tables A.6 and A.7.

Table II.13
Over Crowding Status of Number of Renter Occupied Housing Units
in the Cities of Rome and Utica
 Census 2000 SF3 Data

Place	No Overcrowding	Overcrowding	Severe Overcrowding	Total Occupied Housing Units
Rome	5,714	131	38	5,883
Utica	12,345	361	117	12,823
Total	18,059	492	155	18,706
Percent	90.1%	2.5%	0.8%	93.3%

Another indicator of potential housing problems is whether the housing unit has complete plumbing and kitchen facilities. At the time of the 2000 census, the Cities of Rome and Utica had 233 units that lacked either complete plumbing or kitchen facilities, which represented 0.51 percent of the total housing stock. Of these units, 175 were located in Utica and 58 were located in Rome and represented 0.60 percent and 0.36 percent of the total housing stock, respectively. Rome had a higher rate of units without complete plumbing facilities, where Utica had a higher rate of units without complete kitchen facilities, as can be seen in Table II.14, below.

Table II.14
Housing Units with Incomplete Kitchen and Plumbing Facilities by
Tenure in the Cities of Rome and Utica
 Census Data 2000 SF3 Data

Place	Lacking Complete Plumbing Facilities		Lacking Complete Kitchen Facilities		Total
	Owner Occupied	Renter Occupied	Owner Occupied	Renter Occupied	
Rome	0	6	30	22	58
Utica	41	60	26	48	175
Total	41	66	56	70	233

The third type of consideration pertaining to housing problems reported in the Decennial Census is cost burden. Cost burden is defined as households that spend from 30 to 50 percent of their household income on housing; severe cost burden is defined as households that spend more than 50 percent of their household income on housing. For renters, this represents the monthly rent, plus any energy expenses they may incur. For homeowners, this represents property tax payments, insurance, energy costs, as well as water and sewer service and refuse collection expenses. If the homeowner has a mortgage, the calculation also includes principal and interest payments on the mortgage loan.

Overall, 3,711 renter occupied households in the Cities of Rome and Utica experienced a cost burden at the time the 2000 Decennial Census was taken. This represented 19.9 percent of all renter occupied households. Rome had a lower rate of cost burdened

renters, with 17.5 percent of rental households experiencing a cost burden, compared to 21.0 percent in Utica, as seen below in Table II.15. In the region as a whole, 24.5 percent of renter occupied households experienced a severe cost burden. In both Rome and Utica the number of households with a severe cost burden is higher than the number of renter occupied households with a cost burden. In Rome, 20.5 percent of households experienced a severe cost burden, where as 26.3 percent of renter occupied households in Utica are severely cost burdened.

Table II.15
Housing Cost Burdens
 Census 2000 SF3 Data

Degree of Cost Burden	Rome	Utica	USA	Rome/Utica Average
Renters				
Cost Burden	17.5%	21.0%	20.8%	19.9%
Severe Cost Burden	20.5%	26.3%	19.1%	24.5%
Homeowners with a Mortgage				
Cost Burden	12.4%	7.9%	17.7%	15.7%
Severe Cost Burden	7.3%	10.0%	9.1%	8.8%
Homeowners without a Mortgage				
Cost Burden	8.6%	8.8%	6.5%	8.7%
Severe Cost Burden	6.5%	5.0%	4.2%	5.6%

For owner-occupied households with a mortgage, only 1,305 households in the Rome and Utica region experienced a cost burden, which represents 15.7 percent of total owner-occupied households with a mortgage. In Rome, 12.4 percent of owner-occupied households with a mortgage experienced a cost burden, which is higher than the rate in Utica of 7.9 percent. At the time of the 2000 census, 8.8 percent of total owner-occupied households with a mortgage experienced a severe cost burden. In Rome, 7.3 percent of homeowners with a mortgage experienced a severe cost burden, compared to 10.0 percent in Utica.

Homeowners without a mortgage had the lowest instance of cost burden, with 592 or 8.7 percent of all homeowners without a mortgage experiencing a cost burden. This group also experienced the lowest amount of severe cost burden, with only 378 or 5.6 percent of all owner-occupied households without a mortgage experiencing a severe cost burden.

It is important to keep in mind that those experiencing a severe cost burden are at risk. For renters, with one financial setback, they are likely to have to choose between a variety of unsatisfactory choices, such as rent versus food or rent versus healthcare for their family. For a homeowner with a mortgage experiencing a severe cost burden, one unforeseen financial requirement, such as temporary illness, divorce, or the loss of employment, may force the homeowner to face foreclosure or bankruptcy. Both of these situations indicate that the householder is at risk of homelessness. Additional detailed data on renters and homeowners can be found Appendix A, in Tables A.8, A.9, and A.10.

For those households that no longer have a mortgage, but also experience a severe cost burden, these householders may be unable to conduct periodic maintenance and repair of their home. Hence, the housing unit is at-risk of dilapidation and contributing to blight. Both of these situations should be of concern to policy makers and program managers.

SUMMARY

The Cities of Rome and Utica have been experiencing a decline in population, decreasing by 2.4 percent since 2000. The racial and ethnic makeup of Rome and Utica is predominately white, but the 10,488 African-Americans tend to be concentrated in specific geographic areas within the two cities. The same situation is also true for the population in poverty, with persons in poverty concentrated in selected Block Groups.

Of the 45,458 households, 20,053 are owner-occupied, which computes to a homeownership rate of 51.7 percent. There is a low rate of overcrowding or severe overcrowding in both owner-occupied and renter-occupied households. The number of housing units lacking complete kitchen or plumbing facilities is also low, which implies adequate living conditions within the current housing stock. The rate of cost burdened and severe cost burdened households is around the national average for most households. A notable exception is that renter-occupied homes have a much higher rate of households experiencing severe cost burden than the national average.

SECTION III. LENDING PRACTICES

Since the 1970s, the federal government has enacted several laws aimed at promoting fair lending practices in the banking and financial services industries. Although the record is improving, discriminatory practices have not been entirely eliminated. A brief description of selected federal laws aimed at promoting fair lending follows:

The 1968 **Fair Housing Act** prohibits discrimination in housing based on race, color, religion, or national origin. Under the FHA, it is illegal to discriminate against any of the protected classes in residential real estate transactions that include making loans to buy, build or repair a dwelling; selling, brokering or appraising residential real estate; or selling or renting a dwelling.

The **Equal Credit Opportunity Act (ECOA)** was passed in 1974 to prohibit discrimination in lending based on race, color, religion, national origin, sex, marital status, age, receipt of public assistance, or the exercise of any right under the Consumer Credit Protection Act.⁷

The **Community Reinvestment Act (CRA)** was enacted in 1977 to require each federal financial supervisory agency to encourage financial institutions to help meet the credit needs of their entire community—including low- and moderate-income neighborhoods within those communities. New regulations went into effect at the beginning of 1996.

Congress enacted the **Home Mortgage Disclosure Act (HMDA)** in 1975 and amended the act from 1988 through 1991 and again in 2003. Under the act, financial institutions are required to report the race, sex, and income of mortgage applicants and borrowers by Census Tract. Analysis presented herein is from the HMDA data system.

Furthermore, HUD works with the lending industry to promote “**Fair Lending-Best Practices Agreements.**” The agreements represent voluntary efforts to improve individual banks’ performance in providing homeownership opportunities to minorities and low income persons by eliminating discriminatory barriers.

The New York Division of Human Rights has established additional laws concerning unlawful discriminatory practices in relation to credit. These laws make it illegal to discriminate on the basis of race, creed, color, national origin, sexual orientation, military status, age, sex, marital status, disability, or familial status in the credit market. It is also illegal to make an inquiry of an applicant concerning his or her capacity to reproduce, or his or her use of any form of birth control or family planning.⁸

⁷ *Closing the Gap: A Guide to Equal Opportunity Lending*, The Federal Reserve Bank of Boston, April 1993.

⁸ N.Y. Executive Law, Article 15, Human Rights Law:
http://www.dhr.state.ny.us/Law_and_Regulations_Unlawful.html

HOME MORTGAGE DISCLOSURE ACTION DATA ANALYSIS

The Home Mortgage Disclosure Act (HMDA) requires both depository and non-depository lenders to collect and publicly disclose information about housing-related loans and applications for such loans. Under the act, financial institutions are required to report the race, sex, loan amount, and income of mortgage applicants and borrowers by Census Tract. The data is considered “raw,” in that there are data entry errors occasionally evident as well as incomplete loan applications included in the data. Nevertheless, reporting institutions must meet a set of criteria for being required to report. For depository institutions these are:

1. The institution must be a bank, credit union, or savings association;
2. The total assets must exceed the coverage threshold;⁹
3. The institution must have had a home or branch office in an MSA;
4. The institution must have originated at least one home purchase loan or refinancing of a home purchase loan secured by a first lien on a one-to-four-family dwelling;
5. The institution must be federally insured or regulated; and,
6. The mortgage loan must have been insured, guaranteed, or supplemented by a federal agency or intended for sale to Fannie Mae or Freddie Mac.

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

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

Hence, most mortgage lending activity is included in the HMDA data and this information represents the most comprehensive collection of information regarding home purchase originations, home remodel loan originations, and refinancing available. Furthermore, since data is available by Census Tract, information specific to Utica and Rome has been extracted from the data system. Detailed tables of all concepts mentioned in this section are presented in the Appendix B at the end of this document.

As seen in Table III.1 on the following page, there were a total of 32,691 loan applications over the six year period between 2001 and 2006. The largest segment of loan applications were for refinancing, with 17,215 applications, or 52.6 percent of all loan applications. The next largest block of loans were for home purchase with 9,249 applications, which represents 28.2 percent of loan applications

⁹ Each December the Federal Reserve announces the threshold for the following year. The asset threshold may change from year to year, based on changes in the Consumer Price Index for Urban Wage Earners and Clerical Workers.

Table III.1
Purpose of Loan by Year in the Cities of Rome and Utica
HMDA Data 2001 - 2006

Purpose	2001	2002	2003	2004	2005	2006	Total
Home Purchase	1,228	1,345	1,496	1,587	1,692	1,901	9,249
Home Improvement	941	757	638	1,003	1,305	1,562	6,206
Refinancing	2,289	2,801	3,430	3,010	3,108	2,577	17,215
Multifamily Dwelling	3	4	14	0	0	0	21
Total	4,461	4,907	5,578	5,600	6,105	6,040	32,691

A closer examination of the 9,249 home purchase loan applications shows the majority of these applications, 88.4 percent, are for owner-occupied homes, as seen in Table III.2, below. Since 2001, owner-occupied loan applications have experienced steady growth, rising to a high of 1,587 applications in 2006. To better interpret the ability of persons to choose a home to purchase, the analysis of HMDA data will focus on the outcome of those loan applications for owner occupied homes.

Table III.2
Owner Occupancy Status for Home Purchase
Loan Applications in the Cities of Rome and Utica
HMDA Data 2001 - 2006

Year	Owner Occupied	Not Owner Occupied	Not Applicable	Total
2001	1,140	86	2	1,228
2002	1,252	82	11	1,345
2003	1,398	94	4	1,496
2004	1,395	185	7	1,587
2005	1,405	274	13	1,692
2006	1,587	307	7	1,901
Total	8,177	1,028	44	9,249

There are four types of loan methods covered in this data: conventional loans, those which are FHA insured, those which are VA guaranteed, and other secured through rural housing or a farm service agency. The 4,673 loan applications for a conventional loan accounted for the majority, 57.1 percent, of owner-occupied home loan applications as seen in Table III.3, below. There were also 3,208 FHA-Insured loan applications, which accounted for 39.2 percent of owner-occupied home loan applications. Between 2001 and 2006, applications to conventional lenders have increased every year, reaching a high of 1,088 in 2006. Applications to FHA-Insured reached a high in 2003 and have since been trending down reaching a low of 403 applications in 2005.

Table III.3
Owner Occupied Home Purchase Loan Applications by Loan Type in the Cities of
Rome and Utica
HMDA Data 2001 - 2006

Loan Type	Conventional	FHA - Insured	VA - Guaranteed	Rural or Farm Service Agency	Total
2001	525	570	43	2	1,140
2002	578	631	43	.	1,252
2003	700	641	57	.	1,398
2004	832	514	49	.	1,395
2005	950	403	52	.	1,405
2006	1,088	449	50	.	1,587
Total	4,673	3,208	294	2	8,177

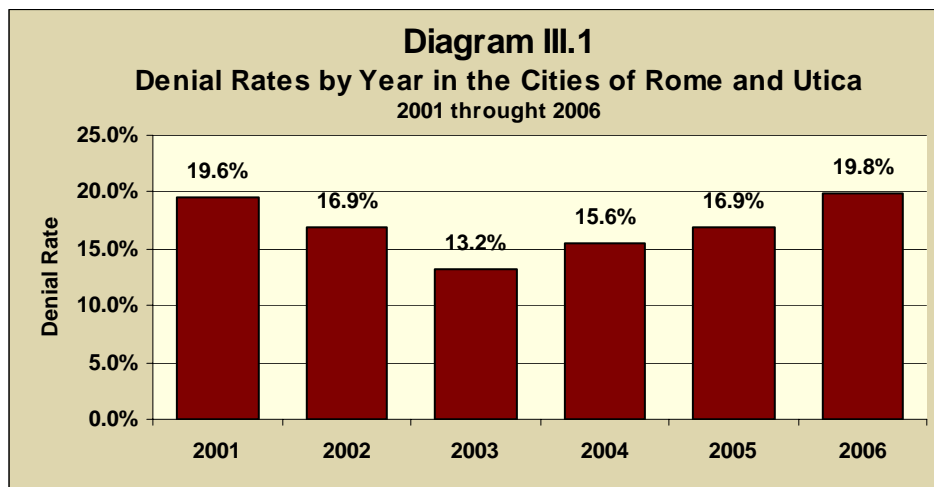
Lending institutions can take one of several actions pertaining to the mortgage loan application. "Originated" indicates that the loan was made by the lending institution. "Approved but not accepted" represents loans approved by the lender, but not accepted by the applicant. This generally occurs if better terms are found at another lending institution. "Application denied by financial institution" defines a situation where the loan application failed. "Application withdrawn by applicant" means that the applicant closed the application process. "File closed for incompleteness" means that the loan application process was closed by the institution due to incomplete information. "Loan purchased by the institution" indicates that the previously originated loan was purchased on the secondary market.

To examine the underlying success or failure of home purchase loan applicants, only loan originations and loan denials are inspected. Over the six year period, a total of 4,546 applications were originated and 933 were denied. This computes to a denial rate of 17.0 percent for the entire period, as seen in Table III.4, below.

Table III.4
Owner Occupied Home Purchase Loan Applications by Action Taken in the Cities of Rome and Utica
 HMDA Data 2001 - 2006

Action Taken	2001	2002	2003	2004	2005	2006	Total
Loan Originated	640	682	781	786	799	858	4,546
Application Approved But Not Accepted	38	44	42	53	65	89	331
Application Denied	156	139	119	145	162	212	933
Application Withdrawn By Applicant	44	54	62	66	82	80	388
File Closed for Incompleteness	10	16	17	29	34	39	145
Loan Purchased by the Institution	252	317	377	316	263	309	1,834
Total	1,140	1,252	1,398	1,395	1,405	1,587	8,177
Denial Rate	19.6%	16.9%	13.2%	15.6%	16.9%	19.8%	17.0%

However, the denial rates fell for a few years but are again on the rise, as seen in Diagram III.1, below, reaching a high of 19.8 percent in 2006.



However, further analysis shows denial rates vary when applicants are classified by personal characteristics, such as race, gender and ethnicity. For example, examining denial rates based on gender reveals that over the six year period males tended to have a lower denial rate than females, 15.0 percent for males versus 17.3 percent for females. However, during 2005 and 2006, females had a lower denial rate than males as can be seen in Table III.5, below.

Table III.5
Denial Rate by Gender in the Cities of Rome and Utica
HMDA Data 2001 - 2006

Gender	2001	2002	2003	2004	2005	2006	Total
Male	15.4%	12.9%	11.1%	13.0%	16.8%	19.4%	15.0%
Female	23.0%	16.4%	14.7%	17.7%	15.5%	17.8%	17.3%
Not Provided by Applicant	33.7%	64.6%	37.5%	28.6%	29.4%	53.3%	40.9%
Not Applicable	0.0%	.	.	100.0%	.	.	.
Total	19.6%	16.9%	13.2%	15.6%	16.9%	19.8%	17.0%

Over the six year period, whites had the lowest denial rate with only 14.3 percent being denied. Native Americans had the highest denial rate, 42.9 percent, but had few applications. Both Blacks and Asians submitted many more loan applications than Native Americans and consistently had higher rates of denial than whites, with rates of 22.1 and 25.5 percent, respectively, as seen in Table III.6, below. Hispanics also had a very high denial rate, over 42 percent.¹⁰

Table III.6
Denial Rate for Owner Occupied Home Purchase Loan Applications by Race
in the Cities of Rome and Utica
HMDA Data 2001 - 2006

Year	Native American	Asian	Black	Hispanic (Race)	White	Other	Not Provided	Not Applicable	Total	Hispanic (Ethnicity)
2001	0.0%	38.9%	36.4%	15.0%	15.4%	23.1%	36.3%	20.0%	19.6%	.
2002	50.0%	0.0%	13.3%	29.4%	12.7%	33.3%	60.9%	0.0%	16.9%	.
2003	100.0%	19.2%	25.0%	14.8%	11.7%	7.7%	25.9%	.	13.2%	.
2004	100.0%	19.0%	31.6%	.	12.5%	.	34.9%	50.0%	15.6%	25.0%
2005	0.0%	25.0%	14.7%	.	14.7%	.	38.4%	.	16.9%	45.5%
2006	33.3%	22.2%	28.9%	.	17.8%	.	42.4%	.	19.8%	47.8%
Total	42.9%	22.1%	25.5%	18.8%	14.3%	20.0%	39.6%	37.5%	17.0%	42.8%

HMDA data also provides information about the reason the loan was denied. The financial institutions are not required to fill out this field, so there are missing data entries, but it still remains a valuable component in HMDA data analysis. Table III.7 presents these data on the following page. The most cited reason for denying a loan was credit history, which accounted for 33.5 percent of reported causes for denial. The next most cited reason was debt-to-income ratio, which implies many households lacked sufficient income to carry the

¹⁰ The Federal Research System altered the definition of race and ethnicity in 2003. Hispanic was previously classed as a race, but since 2004 has been correctly specified as an ethnicity.

accumulated level of debt they would have after the addition of a mortgage. There are 312 denied applications that did not record the reason, and an additional 99 denied applications that listed “other” as a reason. Although the cause for loan denials are not perfectly reported, a better understanding of credit markets, improved credit history and effective debt management skills would help lower the application denial rate.

Table III.7
Owner Occupied Home Purchase Loan Application by Denial Reason
in the Cities of Rome and Utica
HMDA Data 2001 - 2006

Reason for Denial	2001	2002	2003	2004	2005	2006	Total
Debt-to-income Ratio	18	21	12	16	18	16	101
Employment History	4	0	4	6	10	5	29
Credit History	26	31	35	25	43	48	208
Collateral	3	10	6	7	20	28	74
Insufficient Cash	2	5	2	6	8	5	28
Unverifiable Information	3	2	2	4	12	7	30
Credit Application Incomplete	6	4	5	16	11	7	49
Mortgage Insurance Denied	0	1	1	0	0	1	3
Other	7	10	12	30	15	25	99
Missing Reason	87	55	40	35	25	70	312
Total	156	139	119	145	162	212	933

Table III.8, below, presents denial reasons by race, with the intention of highlighting which groups are experiencing the greatest level of “missing denial reasons.” The group with the greatest share of “missing denial reason” tended to be Hispanics.

Table III.8
Owner Occupied Home Purchase Loan Applications by Reason for Denial by Race
in the Cities of Rome and Utica
HMDA Data 2001-2006

Reason for Denial	Native American	Asian	Black	Hispanic	White	Other	Not Provided	N.A.	Total
Debt-to-income Ratio	0	2	7	2	75	0	15	0	101
Employment History	0	3	1	0	22	0	3	0	29
Credit History	2	5	11	2	142	3	43	0	208
Collateral	0	4	1	2	57	0	10	0	74
Insufficient Cash	0	2	2	0	21	0	3	0	28
Unverifiable Information	0	2	3	0	19	0	6	0	30
Credit Application Incomplete	0	1	5	0	29	1	12	1	49
Mortgage Insurance Denied	0	0	0	0	3	0	0	0	3
Other	2	4	6	0	76	0	11	0	99
Missing	2	7	15	6	211	3	63	5	312
Total	6	30	51	12	655	7	166	6	933
Percent Missing by Race	33.3%	23.3%	29.4%	50.0%	32.2%	42.9%	38.0%	83.3%	33.4%

Although the percentage of “missing” denial reasons are lower for Blacks and Asians, than for whites, there are too few “missing” values to make a reliable statement. To better assess actions in lending markets, the financial attributes of the applicant must be normalized in order to inspect prospective discriminatory activities in the decision process. As noted previously, HMDA data contains information on the household income of the loan applicant. Consequently, denial rates by race and ethnicity were segmented by level of income over the six year period.

As seen in Table III.9, below, almost all groups with lower household incomes have a high denial rate. As the income level rises, denial rates for most groups fall, but denial rates for whites fall faster than for minorities. For all income levels, Blacks and Hispanics have higher denial rates than whites, with some denial rates reaching 75.0 percent.

Table III.9
Percent Denial Rates by Income by Race in the Cities of Rome and Utica
HMDA Data 2001-2006

Race	<= \$15K	\$15K - \$30K	\$30K - \$45K	\$45K - \$60K	\$60K - \$75K	> \$75K	Data Missing	Total
American Indian or Alaskan Native	.	0.0%	0.3%	0.6%	1.0%	0.0%	.	0.4%
Asian or Pacific Islander	.	0.1%	0.2%	0.5%	0.4%	0.2%	0.6%	0.2%
Black	45.5%	21.1%	26.1%	22.5%	46.7%	14.3%	33.3%	25.5%
Hispanic (Race)	66.7%	18.2%	15.8%	16.7%	0.0%	50.0%	0.0%	18.8%
White	36.0%	16.9%	12.1%	14.8%	11.2%	9.9%	22.3%	14.3%
Other	0.0%	20.0%	15.4%	100.0%	.	0.0%	100.0%	20.0%
Not Provided by Applicant	64.3%	43.3%	38.1%	33.3%	22.9%	37.1%	65.0%	39.6%
Not Applicable	100.0%	0.0%	0.0%	50.0%	.	.	50.0%	37.5%
Total	40.3%	19.2%	14.3%	17.7%	13.7%	12.0%	31.3%	17.0%
Hispanic (Ethnicity)	75.0%	49.0%	36.0%	37.5%	60.0%	45.5%	20.0%	42.8%

Owner-occupied home loan applications have also been segmented by lender type. Lender types have been identified by their major type of lending activity: subprime, manufactured home, or “all other,” herein termed prime lenders. Some lenders that are classified as prime may indeed have sub-prime or manufactured home lending products. The purpose of this analysis is to determine whether there are differences in denial rates between these types of lenders within disparate income or racial groups. Denial rates are compared between these types of lenders.

Table III.10, below, compares prime and subprime lender markets over the 6-year period. Over this period, applications to subprime lenders increased faster than prime lenders, increasing at an average rate of 30.5 percent per year since 2002, compared to an average increase of 6.17 percent per year for prime loans. In 2002, subprime applications numbered 34 and steadily increased to a high of 96 in 2006. The denial rates for subprime lenders have a much higher denial rate, averaging 55.2 percent for the six year period.

Table III.10
Originated and Denied Loan Applications by Type of Lender
in the Cities of Rome and Utica
HMDA Data 2001 - 2006

Application Action	2001	2002	2003	2004	2005	2006	Total
Prime Lenders							
Loan Originated	616	664	751	753	757	818	4,359
Application Denied	87	104	82	109	125	156	663
Denial Rate	12.4%	13.5%	9.8%	12.6%	14.2%	16.0%	13.2%
Subprime Lenders							
Loan Originated	14	16	23	33	42	40	168
Application Denied	39	18	21	36	37	56	207
Denial Rate	73.6%	52.9%	47.7%	52.2%	46.8%	58.3%	55.2%

Further analysis of subprime lenders concentrating on racial denial rates shows minority applications are denied more frequently than non-minority applicants. Subprime lenders had higher denial rates for all racial groups, including whites, than prime lenders as seen in Table III.11, at right.

Table III.11
Home Purchase Denial Rates by Lender
in the Cities of Rome and Utica
HMDA Data 2001 - 2006

Race	Denial Rates by Lender Type	
	Prime	Subprime
Native American	38.5%	100.0%
Asian	21.1%	66.7%
Black	21.2%	57.9%
Hispanic	12.1%	80.0%
White	11.4%	49.0%
Other Race	17.6%	100.0%
Average	12.1%	50.7%
2004-06 Hispanics	39.7%	68.8%

HMDA data includes the Census Tract in which the application was filed. Consequently, an inspection of the spatial distribution of minority denial rates was performed, thereby allowing the viewing of denial rates by geographic areas within the Cities of Roma and Utica. These denial rates are presented in Maps III.1 and III.2 on the following pages.

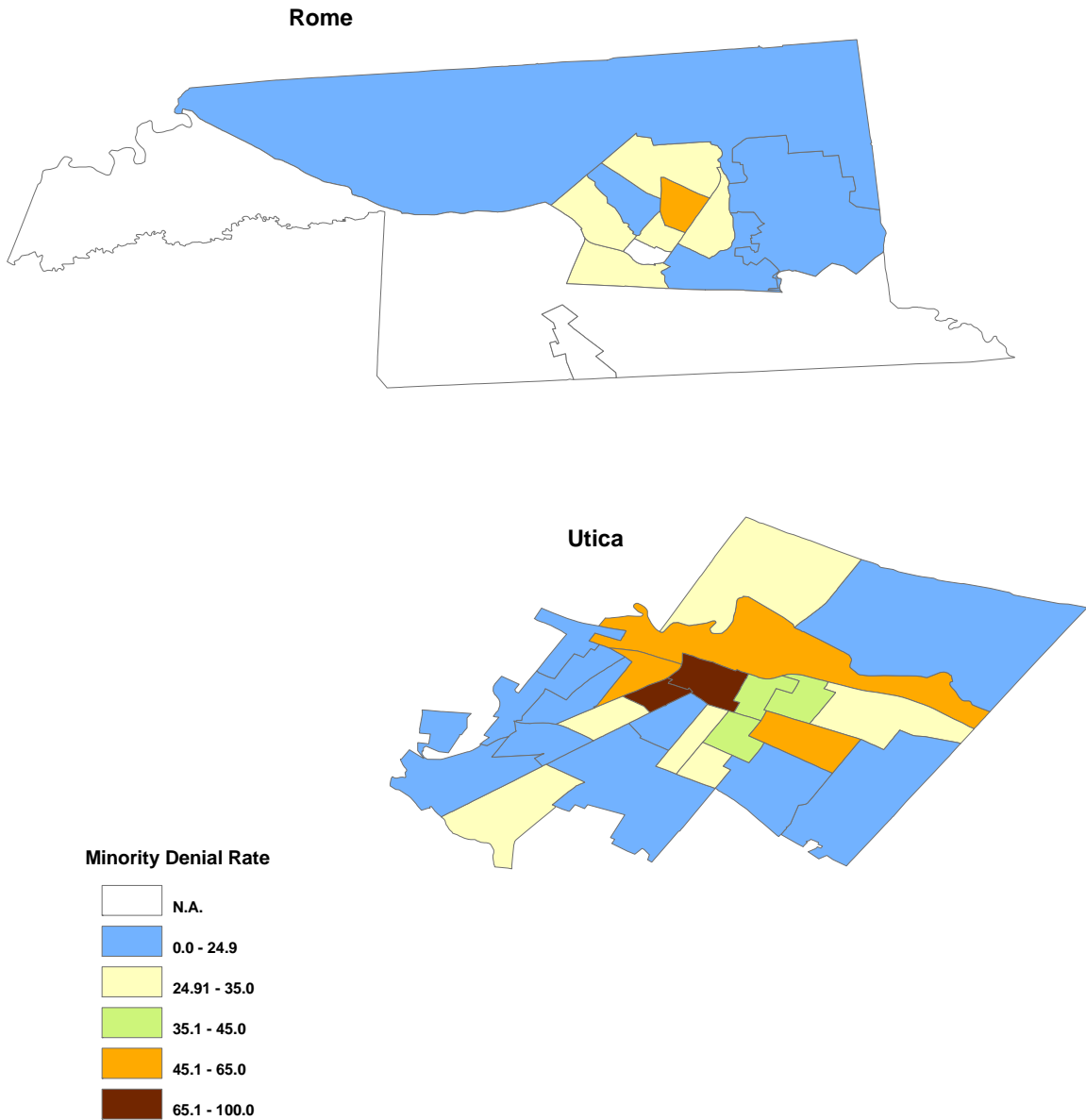
The jurisdiction average in the cities of Rome and Utica for racial minority denial rates is 24.9 percent. For a census tract to have a disproportionate share of minority application denials, 34.9 percent or more of minority loan applications must be denied. Rome and Utica have nine Census Tracts with a disproportionate share of denied minority applications, with eight of the nine Tracts located in Utica. This information is presented in Map III.1 on the following page and additional detailed data is located in Appendix B, Table B.15.

The Rome and Utica jurisdiction average for Hispanic denial rates is 35.7 percent. For a Census Tract to have a disproportionate share of Hispanic application denials, 45.7 percent or more of minority loan applications must be denied. Rome and Utica have 12 census tracts with a disproportionate share of Hispanic applications being denied. Although the majority of these Census Tracts are in Utica, Rome does have a census tract with one of the highest concentrations of Hispanic applications denial rates. This information is presented in Map III.2 on page 34, with additional detailed data located in Appendix B, Table B.16.

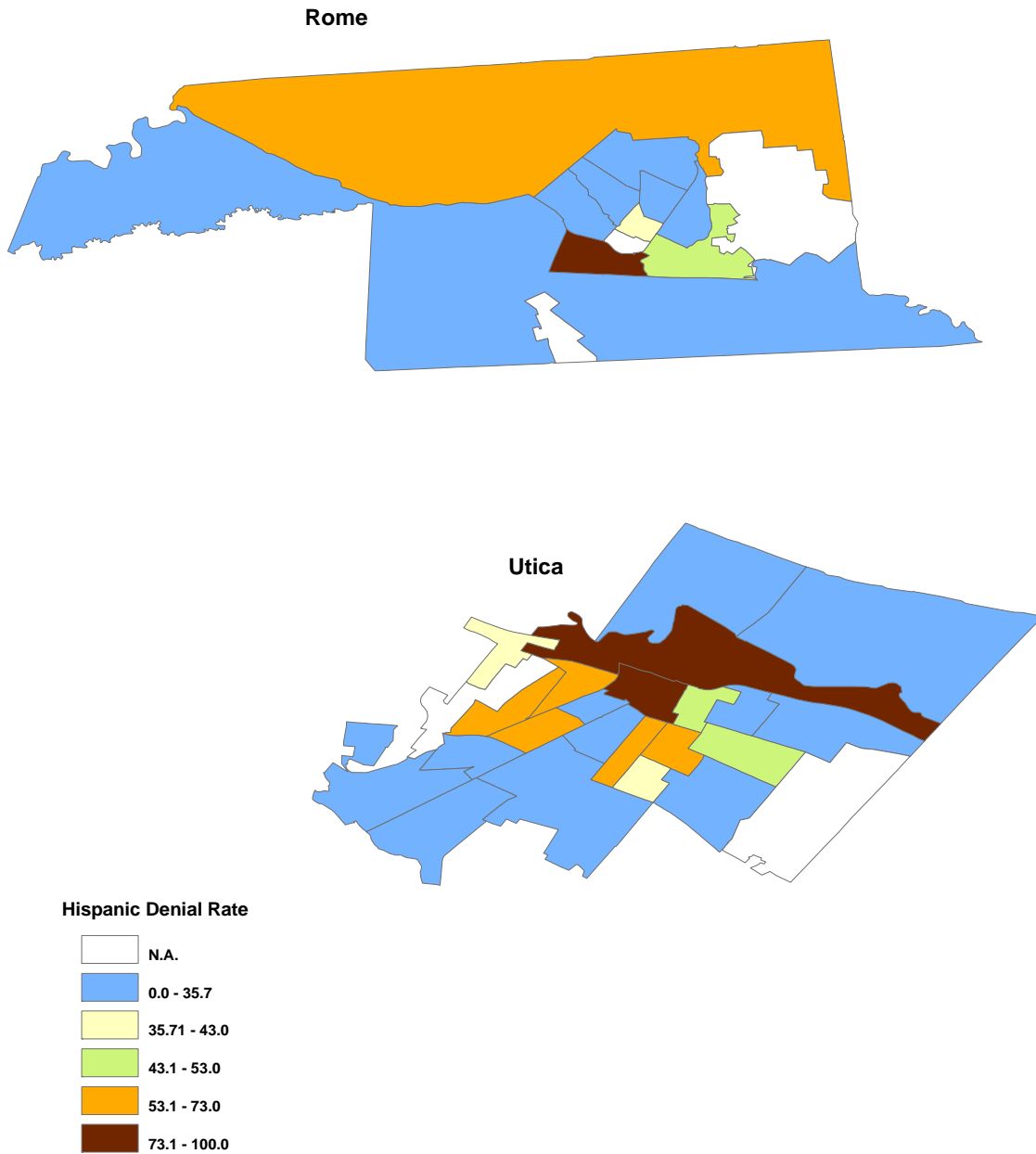
In 2004, HMDA data changed reporting requirements, and now includes an indicator of whether a loan may be in violation of the 2002 Home Owner Equity Protection Act. This is when the interest rate on a loan was more than three percentage points above the comparable U.S. Treasury instruments for first mortgages and five percentage points above the comparable U.S. Treasury instruments for second mortgages at the time the loan was originated. These types of loans are termed *High Annual Percentage Rate Loans*, or HALs. Loans having such terms are often considered to be “predatory” in nature. Additional evaluation of the HMDA data was conducted over the 2004 through 2006 period to determine the degree to which originated home loans were predatory in nature.

Between 2004 and 2006, Utica and Rome had a total of 312 HALs, which accounted for 12.8 percent of all originated owner-occupied home purchase loans. Between 2004 and 2006, originated loans rose nine percent, but HALs doubled, reaching 139 in 2006.

Map III.1
Minority Denial Rates by Census Tract in the Cities of Rome and Utica
HMDA Data 2001- 2006



Map III.2
Hispanic Denial Rates by Census Tract in the Cities of Rome and Utica
 HMDA Data 2001- 2006



As seen in Table III.12, the level of loan activity by such HALs has increased, but these are small increases when compared with other areas of the United States.

Table III.12
Originated Owner-Occupied Home Purchase Loans
by Predatory Status in the Cities of Rome and Utica
HMDA 2004 - 2006

Loan Type	2004	2005	2006	Total
Other Originated	719	693	719	2,131
High APR Loan	67	106	139	312
Total	786	799	858	2,443
Percent High APR	8.5%	13.3%	16.2%	12.8%

Table, III.13, below and at right, shows the share of HALs by race.

African-Americans consistently have higher rates of HALs than whites during all years between 2004 and 2006. Asians also had higher rates of HALs than whites for most of the same period. Hispanics also have higher rates of HALs than non-Hispanic households. Between 2004 and 2006, 25.3

percent of loans to Hispanics were HALs, compared to 11.3 percent of loans to non-Hispanics. This suggests that such lenders having such loan products may be targeting the loan products to specific populations and areas in the Cities of Rome and Utica.

Table III.13
Rate of Predatory Loans of Originated Owner-Occupied
Home Purchase Loans by Race in the Cities of Rome and
Utica
HMDA Data 2004 - 2006

Race	2004	2005	2006	Total
Asian	23.5%	4.2%	23.8%	16.1%
Black or African American	19.2%	17.2%	21.9%	19.5%
White	7.2%	10.9%	13.8%	10.7%
Not Provided by Applicant	17.1%	53.3%	61.8%	43.3%
Not Applicable	20.0%	.	.	20.0%
Total	8.5%	13.3%	16.2%	12.8%
Hispanic	14.3%	30.0%	27.8%	25.3%

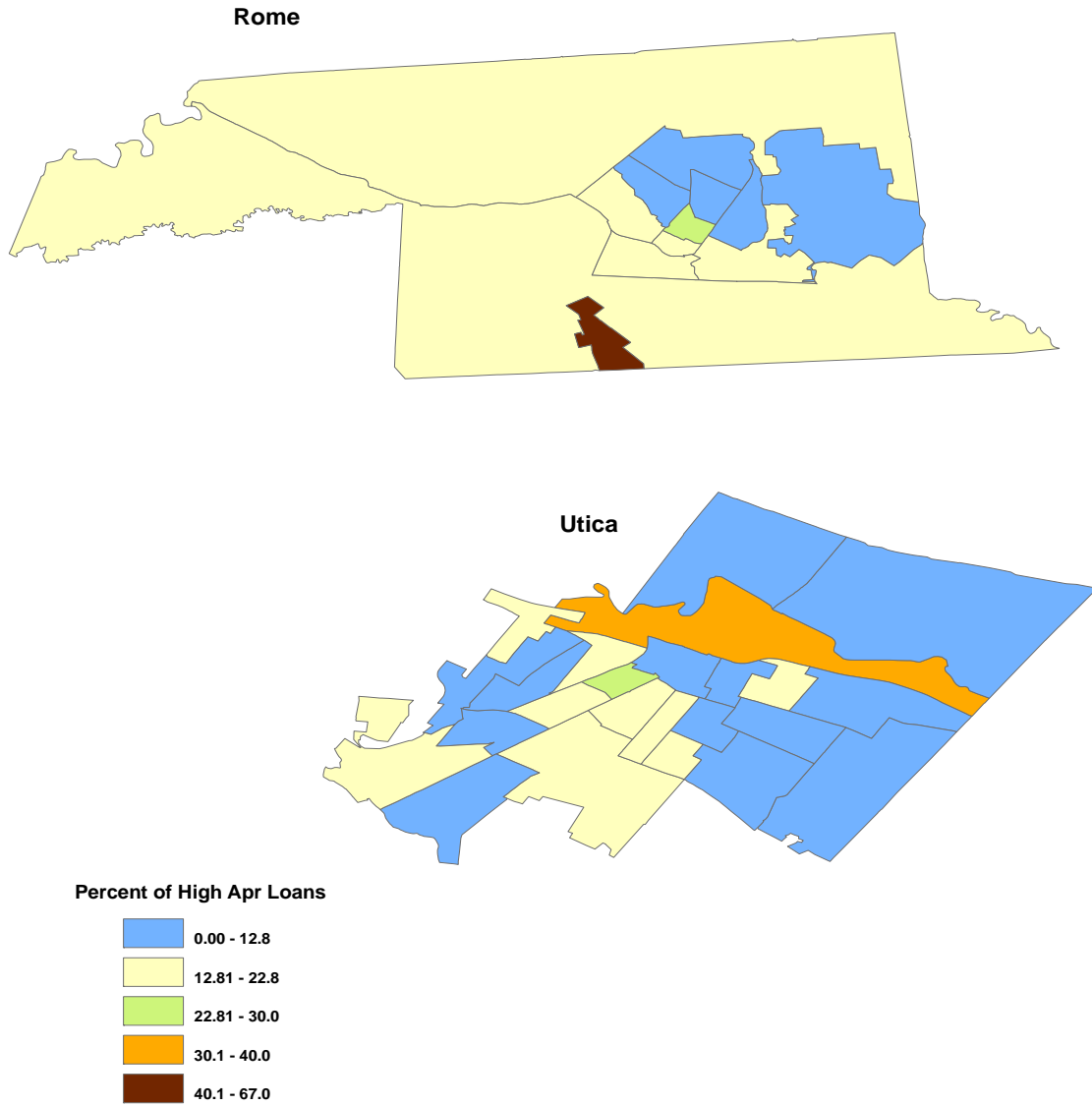
Spatial analysis of HALs was also conducted and Map III.3, presented on the following page, shows the percentage of HALs by census tract. As noted above, within the Cities of Rome and Utica, HALs account for 12.8 percent of originated loans.

Four census tracts have a disproportionate share of HALs, two in Rome and two more in Utica. Additional detailed data can be found in Table B.17, in Appendix B.

SUMMARY

Racial and ethnic minorities, especially Blacks and Hispanics, face much higher rates of mortgage application denials for homeownership than do whites. This is true even after comparing income across racial and ethnic groups. The reason most frequently offered regarding denials relates to lack of sufficient quality in credit, followed by debt to income ratio. The subprime lending market has expanded, although the prime market still accounts for 91.7 percent of loan applications. The racial and ethnic minority shares of high annual percentage rate loans, those loans that appear to be predatory in nature, have been consistently higher over the last three years than non-minority groups.

Map III.3
High Annual Percentage Loans by Census Tract in the Cities of Rome and Utica
HMDA Data 2004-2006



SECTION IV. FAIR HOUSING AGENCIES AND PROGRAMS

The following narrative provides an enumeration of key agencies and organizations which operate in the fair housing arena in the Cities of Rome and Utica. The section concludes with a succinct review of related national housing studies.

MAJOR FAIR HOUSING AGENCIES AND ORGANIZATIONS

THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

The United States Department of Housing and Urban Development (HUD) oversees, administers, and enforces the Fair Housing Act. HUD's Regional office in New York oversees housing, community development, and fair housing enforcement in the state of New York. HUD also provides education and outreach, monitors agencies that receive HUD funding for compliance with civil rights laws, and works with state and local agencies under the Fair Housing Assistance (FHAP) and Fair Housing Initiative (FHIP) programs.¹¹

Fair Housing Assistance Programs and Fair Housing Initiative Programs

In the United States, many agencies receive funding directly from HUD as FHAPs or FHIPs. The fundamental difference between the two programs is that FHAP programs require an ordinance or law that empowers a governmental agency to enforce the Fair Housing Act; they are thus considered "substantially equivalent" to federal agency enforcement activities. HUD contracts with that agency to process fair housing complaints and reimburses the jurisdiction on a per case basis.¹² FHAP grants are given to public, not private, entities and are given on a noncompetitive, annual basis to substantially equivalent state and local fair housing enforcement agencies.

FHIPs, on the other hand, may be a government agency, a private non-profit or for-profit organization. This competitive grant program provides funds to organizations to carry out projects and activities designed to enforce and enhance compliance with the Fair Housing Act. Eligible activities include education and outreach to the public and the housing industry on fair housing rights and responsibilities, as well as enforcement of fair housing complaints, including testing and litigation. In 2006, the FHIP program awarded \$18.1 million in the following two types of grants across the nation:

Private Enforcement Initiative (PEI) grants: About \$13.9 million was awarded to assist groups in the investigation and enforcement of alleged violations of the Fair Housing Act and substantially equivalent state and local fair housing laws.

¹¹ <http://www.hud.gov/local/index.cfm?state=ny>

¹² <http://www.hud.gov/offices/fheo/progdesc/title8.cfm>

Education and Outreach Initiative (EOI) grants: HUD awarded \$4.2 million to groups that educate the public and housing providers about their rights and obligations under federal, state, and local fair housing laws.

HUD received applications from 268 groups, out of which 102 were chosen to receive funding. Grants to New York State totaled \$986,896 dollars.

In 2007, the FHIP program awarded \$17.1 million for two types of grants across the nation:

Private Enforcement Initiative grants (PEI) - HUD awarded \$14.0 million to assist groups in the investigation and enforcement of alleged violations of the Fair Housing Act and substantially equivalent state and local fair housing laws.

Education and Outreach Initiative grants (EOI) - HUD awarded \$3.1 million to groups that educate the public and housing providers about their rights and obligations under federal, state, and local fair housing laws.

The 2008 FHIP recipients have not yet been published; however the estimated budget for FHIP grants was \$20 million dollars. HUD's 2009 budget is expected to allocate \$26 million dollars for FHIP grants. The increase of funding for Fair Housing programs will make it easier for community organizations to secure funding and help address the problem of discrimination in the housing market.

Recent New York FHIP Grant Recipients

HUD awards these grants competitively to enable not-for-profit organizations to provide education and outreach activities to promote the Fair Housing Act. The following succinctly identifies the FHIP grants awarded in New York, for the year of 2007.

Long Island Housing Services, Inc., (LIHS) was awarded \$270,417 to conduct fair housing enforcement activities. LIHS will identify discrimination against persons with disabilities, African-Americans, Hispanics, families with children, and people with limited English proficiency. LIHS will provide intake, investigation, counseling, and mediation service to individuals who file housing complaints.¹³

South Brooklyn Legal Services, Inc. (SBLS) was awarded \$183,333 to assist New York City residents of Brooklyn and Queens against discrimination in home financing and sales. SBLS will screen, investigate, and mediate complaints, and provide legal and other assistance to help homeowners avoid foreclosure. SBLS also conducted training sessions for attorneys and advocates assisting individuals who have been a victim of home financing and sales discrimination.

¹³ <http://www.hud.gov/news/releases/pr07-148.pdf>

In Rochester, the Housing Council was awarded \$73,390 to educate racial and ethnic minorities, persons with disabilities, and persons with limited English proficiency on their fair housing rights and how to report discrimination.

In Syracuse, the Fair Housing Council of Central New York, Inc. (FHC) was awarded \$211,346 to conduct a comprehensive fair housing enforcement project in Cuyahoga, Onondaga, Oswego, Jefferson and St. Lawrence counties. FHC will provide intake and investigation of individual housing discrimination complaints and conduct systemic investigations of discriminatory practices, such as redlining.

Creating A FHAP –A Substantially Equivalent Agency

To create a substantially equivalent agency, a state or local jurisdiction must first enact a fair housing law that is substantially equivalent to the federal Fair Housing Act. In addition, the local jurisdiction must have both the administrative capability and fiscal ability to carry out the law. With these elements in place, the jurisdiction may apply to HUD in Washington D.C. for substantially equivalent status. The jurisdiction's law would then be examined, and the federal government would make a determination as to whether it was substantially equivalent to federal fair housing law.

When substantially equivalent status has been granted, complaints of housing discrimination are dually filed with the state (or local agency) and with HUD. The state or local agency investigates most complaints; however, when federally subsidized housing is involved, HUD will typically investigate the complaint. Still, the state or local agencies are reimbursed for complaint intake and investigation and are awarded funds for fair housing training and education.

In New York, there are three designated substantially equivalent agencies, The New York State Division of Human Rights, Rockland County Commission on Human Rights and The Geneva Human Rights Commission. The only New York agency which has jurisdiction over the Cities of Rome and Utica is the New York Division of Human Rights, which is the state's primary anti-discriminatory agency.

REGIONAL FAIR HOUSING AGENCIES AND ORGANIZATIONS

ROME AND UTICA FAIR HOUSING AGENCIES

There is one fair housing agency that is active in the Rome and Utica region: The Fair Housing Council of Central New York (FHC). Their mission is to help enforce laws against discrimination in housing, educate people about rights and responsibilities in the housing market, and create neighborhoods that are diverse in racial, ethnic and other basis.

According to the information provided by the Fair Housing Council of Central New York, the center promotes these objectives by providing a variety of services to the community.

EDUCATION AND OUTREACH

The FHC trains community members to identify housing discrimination. They distribute educational materials to local organizations and issue public service announcements to community-based organizations and local media.

ENFORCEMENT AND LITIGATION

The FHC investigates complaints of suspected cases of housing discrimination and provides free legal representation to victims of illegal housing discrimination.

PREDATORY LENDING AND FORECLOSURE ASSISTANCE PROJECT

The FHC investigates complaint of lending discrimination and predatory lending. They refer cases of lending fraud to state and federal regulatory agencies and also maintain a small foreclosure prevention assistance fund.

RESEARCH AND CONTRACTUAL SERVICES

The FHC produces research-based reports and makes policy recommendations on fair housing issues for governmental agencies. They also perform self-monitoring investigations for companies to ensure their employees are complying with fair housing laws, and provide training to industry professionals. While the FHC has no current formal contractual arrangements to provide services in either Rome or Utica, they do accept and investigate complaints received from the area.

The Fair Housing Council of Central New York can be reached at:

Fair Housing Council of Central New York
327 W. Fayette Street
Mill Pond Landing
Syracuse, NY 13202
1-315-471-0420
Fax: 1-315-471-0549

Additional information and contact information can be found on the FHCCNY website:
<http://www.cnyfairhousing.org/about.html>

LEGAL RESOURCES ON FAIR HOUSING IN THE CITIES OF ROME AND UTICA

The Legal Aid Society of Mid-New York Inc., (LASMNY) is a not-for-profit law office, which provides free legal information, advice and representation to low income persons in the counties of Broome, Cayuga, Chenango, Cortland, Delaware, Herkimer, Jefferson, Lewis, Madison, Oneida, Onondaga, Oswego and Otsego. Qualifications for services are based

on a person's income and family size. The LASMNY has an office located in Utica, NY and handles a variety of cases, including those dealing with housing problems. The LASMNY can be contacted at:

The Legal Aid Society of Mid-New York - Utica Office
255 Genesee Street
2nd Floor
Utica, NY
Phone: 1-315-735-2131
Fax: 1-315-732-3202

The Legal Services of Central New York (LSCNY) normally serves clients in Cayuga, Cortland, Jefferson, Onondaga and Oswego; however special grants enable LSCNY to provide representation to individuals with developmental disabilities and mental illness in several additional counties, including Oneida. More than 300 Lawyers participate in the LSCNY Pro Bono Projects, which provide thousands of hours of free legal services to eligible clients.¹⁴

The LSCNY can be contacted at:

Legal Services of Central New York, Inc.
Empire Building, Suite 300
472 South Salina Street
Syracuse, New York 13202
Phone: 1-315-475-3127
Fax: 1-315-475-2706

The New York Attorney General has a local office in Utica. The Attorney General's Regional Office located on the 5th floor of the New York State Office Building in downtown Utica represents the diverse interests of New York State and its citizens in a large geographic area. The office defends the State in all contractual and personal injury claims brought against it which occur in eight counties reaching as far north as the Canadian border. It also appears in Court on behalf of all of the State's agencies and Authorities. The local office can be reached at:

Office of the New York State Attorney General - Utica Regional Office
207 Genesee St., Room 504
Utica, NY 13501-2812
Phone: 1-315-793-2225

¹⁴ <http://www.cnyfairhousing.org/links.html>

RELATED NATIONAL AND LOCAL FAIR HOUSING STUDIES

In 2000, The United States Department of Housing and Urban Development (HUD) released a publication entitled “Discrimination in Metropolitan Housing Markets” (HDS2000), measuring the prevalence of housing discrimination based on race or color in the United States. The third nationwide effort to measure discrimination against minority home seekers since 1977, HDS2000 measured discrimination in metropolitan areas with populations greater than 100,000 and with significant Black, Hispanic, and/or Native American minorities. The study found that discrimination persists in both rental and sales markets of large metropolitan areas nationwide, but that its incidence has generally declined since 1989. The exception was for Hispanic renters, who faced essentially the same incidence of discrimination in 2000 as they did in 1989.

In April of 2002, HUD released another national study, “How Much Do We Know?” The study found that public knowledge of discriminatory activities was limited, with just one half of the general public able to identify six or more of the eight scenarios describing illegal conduct. In addition, 14 percent of the nationwide survey’s adult participants believed that they had experienced some form of housing discrimination in their lifetime. The study also found that few people had reported this discrimination, with most “seeing little point in doing so.”¹⁵

In its 2004 Fair Housing Trends Report, the National Fair Housing Alliance (NFHA) states that discrimination based on national origin is largely underreported, specifically by Hispanics, Asian-Americans, and Native Americans. This is due, they state, to “language barriers and other cultural issues which could include immigration status, hesitancy to challenge authority, and a general lack of faith in the justice system.”¹⁶

It is possible that the length of time necessary to reach complaint resolution may also deter complainants, as pointed out in the U.S. General Accounting Office’s (GAO) 2004 report, titled “Fair Housing: Opportunities to Improve HUD’s Oversight and Management of the Enforcement Process.” The GAO report found that, although the process had improved in recent years, between 1996 and 2003 the median number of days required to complete fair housing complaint investigations was 259 days for HUD’s Fair Housing and Equal Opportunity Offices and 195 days for FHAP agencies. The report did find a higher percentage of investigations completed within the Fair Housing Act’s 100-day mandate.¹⁷

¹⁵ *How Much Do We Know?* United States Department of Housing and Urban Development, Office of Policy Development and Research, 2002. Document available at <http://www.huduser.org/Publications>.

¹⁶ *2004 Fair Housing Trends Report*, National Fair Housing Alliance, Pg. 8. Available at www.nationalfairhousing.org.

¹⁷ *Fair Housing: Opportunities to Improve HUD’s Oversight and Management of the Enforcement Process*, United States General Accounting Office, Report to Congressional Requesters, April 2004.

The GAO report also identified the following trends between 1996 and 2003:

- The number of fair housing complaints filed each year showed a steady increase since 1998. An increasing proportion of complaints alleged discrimination based on disability, and a declining proportion of complaints alleged discrimination based on race, though race was still the most cited basis of housing discrimination over the period.
- FHAP agencies conducted more fair housing investigations than FHEO agencies over the period. The total number of investigations completed each year increased somewhat after declining in 1997 and 1998.
- Investigation outcomes changed over the period, with an increasing percentage closed without a finding of reasonable cause to believe discrimination occurred. A declining percentage of investigations were resolved by the parties themselves or with help from FHEO or FHAP agencies.

In January of 2005, the Center for Community Capitalism at The University of North Carolina at Chapel Hill (UNC) reported that predatory loan terms increase the risk of mortgage foreclosure in subprime home loans. The study examined recent home mortgages while holding terms the same such as credit scores, loan terms, and varying economic conditions. Conditions in the home mortgage industry have led to predatory lending practices. Previous studies have found a correlation between subprime lending and foreclosures. This study specifically demonstrates that prepayment penalties and balloon payments lead to additional home losses.¹⁸ For example, in the prime lending market only two percent of home loans carry prepayment penalties of any length. Conversely, up to 80 percent of all subprime mortgages carry a prepayment penalty, a fee for paying off a loan early. An abusive prepayment penalty extends more than three years and/or costs more than six months' interest.¹⁹

The article further explains that, according to Fannie Mae, 51 percent of refinance mortgages are in predominantly African-American neighborhoods compared to only nine percent of refinances in predominantly Caucasian neighborhoods. Thus, targeting minorities seems to be an abusive practice in the lending industry. The study also found that consumers appear to be unaware of avoiding "mandatory arbitration." This clause in home mortgage contracts prevents consumers from seeking remedies in court when they find that their home is threatened by illegal and abusive terms.

Increases in foreclosures and evictions are extremely costly to both individual consumers and neighborhoods. Those who are experiencing a severe cost burden are only one step away from being at risk of homelessness. With one financial setback, such as an auto accident, a medical emergency, or a job layoff, homeowners are not able to conduct

¹⁸ <http://www.kenan-flagler.unc.edu/assets/documents/foreclosurerelease.pdf>

¹⁹ <http://www.responsiblelending.org/pdfs/2b003-mortgage2005.pdf>

normal and periodic maintenance on their homes, thereby contributing to a blighting influence. Similarly, increased foreclosures lead to blight in neighborhoods. An increase in education and outreach regarding typical fees charged and consumers' rights in the home mortgage market would help prevent North Shore residents from becoming victims of predatory lending practices.

In May of 2005, HUD published "Discrimination Against Persons with Disabilities: Barriers at Every Step." The study documented findings about housing discrimination toward persons with disabilities, in particular persons with hearing and communication disabilities and physically disabled persons in wheelchairs, using paired tests in the Chicago Metropolitan Area. The report indicated that testers with hearing and communication disabilities "experienced consistently adverse treatment relative to their hearing [counterparts] in almost half of all tests." Testers with physical disabilities were shown to have "experienced consistently adverse treatment relative to their nondisabled [counterparts] in 32.3 percent of all tests."²⁰

In February of 2006, HUD released a follow-up study called "Do We Know More Now?" One aim of the study was to determine whether a nationwide media campaign had proven effective in increasing the public's awareness of housing discrimination, and its desire to report such discrimination. Unfortunately, the study found that public knowledge of most discriminatory situations had not improved between 2000 and 2005. As before, just half of the public knew the law with respect to six or more illegal housing activities. In the 2006 report, 17 percent of the study's adult participants claimed to have experienced discrimination when seeking housing; however, after reviewing descriptions of the perceived discrimination, it was determined that about eight percent of the situations might be covered by the Fair Housing Act. As before, few individuals who felt they had been discriminated against filed a fair housing complaint, again indicating that they felt it "wasn't worth it" or that it "wouldn't have helped."²¹

LOCAL APPLICABLE STUDIES AND ARTICLES

While there have been no significant reports on fair housing in the Cities of Rome and Utica, a few New York studies are worthy of mention.

A report filed in 2004 by the Association of Community Organizations for Reform Now (ACORN) found evidence of discrimination in the rental market against Blacks and Hispanics in Nassau County²². The article found that when white testers were sent into real estate agencies, they were told apartments were available 93 percent of the time. When Hispanics or Blacks were sent to the same agencies, they were told apartments were available only 53 percent of the time, and nearly one-third of minority testers were steered

²⁰ *Discrimination Against Persons with Disabilities: Barriers at Every Step*, United States Department of Housing and Urban Development, May 2005. Document available at <http://www.huduser.org/Publications>.

²¹ *Do We Know More Now?* United States Department of Housing and Urban Development, Office of Policy Development and Research, 2006. Document available at <http://www.huduser.org/Publications>.

²² http://acorn.org/fileadmin/Community_Reinvestment/Reports/Final_report_2_11_9_.pdf

to different, less affluent areas, compared to two percent of whites being referred elsewhere. This test reaffirmed the conclusions of a previous 2000 study on housing discrimination, conducted by the Long Island Housing Services for the federal Department of Housing and Urban Development. In the 2000 study, minorities were found to experience discrimination approximately 50 percent of the time. In 2006, the National Fair Housing Alliance again found discrimination against, racial, ethnic and religious minorities. The report showed real estate agents illegally steered persons of certain groups into specific neighborhoods. Nassau County has a well documented history of housing discrimination against racial, ethnic, and religious minorities, which has segregated the community into minority and non-minority neighborhoods. To counteract this trend Nassau County has adopted tough anti-discrimination laws, which include strong enforcement provisions, and permits victims of discrimination to pursue violations of law through both administrative and judicial avenues.

Although New York City passed the country's first law forbidding discrimination in private housing in 1958, there have been numerous studies documenting New York City as a segregated city, with real fair housing issues. In 2001, the Association of the Bar of the City of New York concluded the city's primary agencies for fair housing enforcement had failed to prevent or remedy cases of discrimination. In 2002, a HUD study found New York had the highest rate of discrimination against prospective Hispanic home buyers, and the fifth-highest rate against African-Americans among the 20 cities in the report. In 2003, the Open Housing Center closed after 40 years of fighting housing discrimination by investigation claims and arranging legal representation to victims of discrimination.²³ However, New York City is attempting to buck the trend of a failing fair housing system by instituting major reforms and expanding fair housing agencies.

²³ <http://query.nytimes.com/gst/fullpage.html?res=9D01E3DB1030F937A25755C0A9629C8B63>

SECTION V. EVALUATION OF THE FAIR HOUSING PROFILE

The following narratives present several perspectives about the status of the fair housing system in the Cities of Rome and Utica, including a complaint and compliance review of the process of lodging housing complaints and fair housing complaint data arising from the complaint system. It also includes the 2008 Fair Housing Survey, a series of telephone interviews with a variety of community-based organizations and stakeholders throughout the Utica and Rome communities. This survey allowed information to be collected on perceptions of both public and private policies, practices, and procedures affecting housing choice, as well as progress that may have been attained in fair housing.

COMPLAINT AND COMPLIANCE REVIEW

COMPLAINT PROCESSES FOR THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

Individuals who believe they have been discriminated against in a housing transaction have several options to file a complaint with HUD. The first step in filing a complaint with HUD is to submit a Housing Discrimination Complaint form explaining the nature of the alleged violation. Housing discrimination complaint forms, HUD-903.1, can be filed over the Internet at: <http://www.hud.gov/offices/fheo/online-complaint.cfm>.

In addition, a form may be downloaded, printed out and completed from <http://www.hud.gov/offices/adm/hudclips/forms/files/903-1.pdf>, and mailed to the following address:

U.S. Department of Housing and Urban Development
Office of Fair Housing and Equal Opportunity
Room 5204
451 Seventh St. S.W.
Washington, DC 20410-2000

People may also file a complaint, get a complaint form or additional information by calling the HUD Housing Discrimination Hotline at 1-800-669-9777, or by writing to the preceding address.

Complainants can also write a letter with:

- Their name and address
- The name and address of the person or persons the complaint is about
- The address of the house or apartment at which the incident occurred
- The date when this incident occurred
- A short description of what happened
- Then mail it to the HUD Fair Housing office in Albany:

Albany Field Office
U.S. Department of Housing and Urban Development
52 Corporate Circle
Albany, NY 12203-5121
(518) 464-4200

After receiving the complaint, HUD notifies the alleged violator of the complaint; that person must submit a response. HUD will investigate the complaint and determine whether reasonable cause exists to believe that the Fair Housing Act has been violated.²⁴

If the Fair Housing Act has been violated, HUD will try to reach a conciliation agreement with the respondent. If an agreement is reached, HUD will take no further action on the complaint. If HUD finds reasonable cause to believe that the discrimination occurred, and no conciliation is reached, the case will be heard in an administrative hearing within 120 days. The case may be handled by the Department of Justice (DOJ) and heard in U.S. District Court if one of the parties so desires.

In the administrative hearing, HUD lawyers will litigate the case for the complainant before an Administrative Law Judge (ALJ). If the ALJ decides that discrimination occurred, the respondent can be ordered:²⁵

- To compensate for actual damages, including humiliation, pain, and suffering
- To provide injunctive or other equitable relief; for example, to make housing available
- To pay the federal government a civil penalty to vindicate the public interest
 - The maximum penalties are \$10,000 for a first violation
 - \$27,500 for a second offense
 - \$50,000 for a third violation within seven years
- To pay reasonable attorney's fees and costs

However, in most cases, HUD will defer the housing complaint and its respective testing, investigation, and enforcement activities to any agency considered as substantially equivalent. That agency for the Cities of Rome and Utica is the New York Division of Human Rights (DHR). DHR must begin work on the complaint within 30 days or HUD may take it back.

COMPLAINT PROCESSES FOR THE NEW YORK DEPARTMENT OF HUMAN RIGHTS

By state law, New York has more protected classes than are protected by the federal government. This means that someone who is in a New York protected class that is not also federally protected must file any discrimination complaints at the local or state level, and not with HUD. Landlords, lenders and Realtors in the Cities of Rome and Utica are

²⁴ This is done in the absence of a substantially equivalent agency.

²⁵ <http://www.hud.gov/offices/fheo/FHLaws/yourrights.cfm>

prohibited from discriminating based on race, creed, color, national origin, religion, sexual orientation, military status, sex, age, marital status, or disability status.²⁶

A charge of discrimination must be filed in person or by mail. If an individual believes they have been discriminated against, they should immediately contact the nearest DHR office, at the address below or call 1-888-392-3644. Complaints must be filed within one year of the unlawful discriminatory act.

Complainants who choose to mail a complaint to DHR can download the complaint form at: <http://www.dhr.state.ny.us/pdf%5CClaimformOnline.pdf>. Once the form has been completed the complainant must sign and have the form notarized. Then it should be mailed to:

New York State Division of Human Rights
Intake Division
One Fordham Plaza, 4th Floor
Bronx, NY 10458

To assist the DHR in expediting the complaint, the following information should be provided:

- Have names, titles, addresses, and phone numbers of all persons alleged to have discriminated against you.
- Provide photocopies of any documentation that supports the allegations made in your complaint
- If possible, supply the correct names and addresses of any witnesses to the alleged act(s) of discrimination.

After the complaint has been received all respondents will be notified. A respondent is a person or entity about whose action is under complaint. Then any issues regarding the jurisdiction will be addressed and resolved. Upon your request, the DHR will forward a copy of the complaint to the U.S. Department of Housing and Urban Development (HUD).

The DHR will conduct an investigation through appropriate methods, such as a written inquiry, field investigation, or an investigatory conference. From the investigation results DHR will determine whether or not there is probable cause to believe an act of discrimination has occurred and will notify both the complainant and respondent in writing.

If there is a finding of no probable cause, or lack of jurisdiction the matter is dismissed and the complainant may appeal to the State Supreme Court within 60 days.

²⁶ NY Executive Law, Article 15: http://www.dhr.state.ny.us/Law%20&%20Regulations_unlawful_discriminatory.html

If there is probable cause that an act of discrimination has occurred then a public hearing will be conducted. A Division attorney or agent will present the case in support of the complaint, or the complainant may elect to retain outside counsel. Then a notice of hearing will be issued.

The hearing will be presided over by an Administrative Law Judge and may last one or more days. A recommended order is prepared and sent to the parties for comment. A Commissioner's Order either dismisses the complaint or finds discrimination.

If an act of discrimination was found to have occurred the Commissioner may order the respondent to cease and desist and take appropriate action, such as ordering damages to be paid. The order may be appealed by either party to the State Supreme Court within 60 days. Within one year, the Compliance Investigation Unit investigates whether the respondent has complied with the provisions of the order.

ROME AND UTICA FAIR HOUSING ORGANIZATIONS

The Fair Housing Council of Central New York (FHC) is the only regional agency that may handle fair housing issues in the Cities of Rome and Utica, although it currently has no formal activities in either City. The FHC advocates for people who have experienced discrimination, through the HUD, DHR or court systems, to bring about positive resolution. The Fair Housing Council of Central New York may be the best first stop for a person who feels they have experienced housing discrimination, due to their local knowledge and focus.

Persons should contact the FHC if they would like more information on federal, state or local fair housing laws, if they believe that they have been a victim of discrimination, lending fraud or predatory lending or if they have general questions about housing discrimination in the rental or for sale market.

The FHC can be contacted at:

Fair Housing Council of Central New York
327 W. Fayette Street
Mill Pond Landing
Syracuse, NY 13202
1- (315) - 471- 0420
1- (FAX) - 471- 0549
<http://www.cnyfairhousing.org/about.html>

HOUSING COMPLAINTS

HOUSING COMPLAINTS FILED WITH HUD

HUD maintains records of all complaints filed with the agency, or filed with the substantially equivalent agency, the DHR, that represent violations of federal housing law. A request was submitted to HUD for fair housing complaint data over the 2000 through 2006 time period. Over this period, HUD reported 16 complaints occurring in the Cities of Rome and Utica. Table V.1, below, presents these complaints and illustrates the basis for each complaint²⁷. Basis refers to the class protected under federal law. A single complaint may have more than one basis; hence the number of bases may be higher than the number of complaints.

Table V.1
Fair Housing Complaints Filed with HUD in the Cities of Rome and Utica
 Basis of Complaint: Federal Fiscal 2000-2006

Year	Race	Disability	Color	Gender	National Origin	Familial Status	Total Basis	Total Complaints
2000	0	1	.	.	.	1	2	1
2001	1	1	1	.	1	1	5	3
2002
2003	3	.	.	1	.	2	6	5
2004	.	2	.	1	2	1	6	3
2005	1	3	.	1	.	1	6	3
2006	1	1	.	1	.	.	3	1
Total	6	8	1	4	3	6	28	16

Over the seven year period, disability, race and familial status were the three most cited bases for the housing complaints filed under federal fair housing law. Gender and national origin were the next most cited reasons. While there were 16 complaints, a total of 28 basis were filed.

Table V.2
Fair Housing Complaints Filed with HUD in the Cities of Rome and Utica
 Disposition of the Complaint: Federal Fiscal 2000-2006

Closure Status	2000	2001	2002	2003	2004	2005	2006	Total
Complainant failed to cooperate	.	.	.	1	.	.	.	1
Conciliation/settlement successful	.	1	.	2	1	.	.	4
No cause determination	1	2	.	2	2	3	1	11
Total Complaints	1	3	.	5	3	3	1	16

Of the 16 fair housing complaints filed, 11 complaints or 68.8 percent were determined to be without cause, as seen in Table V.2 above. This means that after the investigation, it was determined that no violation of federal fair housing law occurred. There were four complaints where claims of discrimination were substantiated.

²⁷ Table C.10 of Appendix C presents these data for both Rome and Utica.

When reporting fair housing complaints, HUD usually contains information on the specific discriminatory issue of the complaint. For the seven year period, the issue for nearly all complaints was listed as “missing”. However, as noted in Table V.3, below, most issues related to the rental market, either discriminatory refusal to rent or discrimination in terms and conditions relating to rental.

Table V.3
Fair Housing Complaints Filed with HUD
Issues of Complaint: Federal Fiscal 2000-2006

Issues	2000	2001	2002	2003	2004	2005	2006	Total
Discriminatory refusal to sell	0	1	0	0	0	0	0	1
Discriminatory refusal to rent	1	1	0	5	1	1	0	9
Discriminatory advertising, statements and notices	0	0	0	0	0	0	0	0
Discrimination in terms/conditions/privileges relating to rental	1	1	0	0	0	1	1	4
False denial or misrepresentation	0	0	0	1	1	0	0	2
Failure to make reasonable accommodation	0	0	0	0	0	1	0	1
Discriminatory acts under Section 318 (coercion)	0	0	0	0	1	0	1	2
Total Issues	2	3	0	6	3	3	2	19

HOUSING COMPLAINTS FILED WITH THE NEW YORK DIVISION OF HUMAN RIGHTS

The New York Division of Human Rights (DHR), as the substantially equivalent agency, received federal housing complaints that are filed dually with both HUD and the DHR. Violations of New York fair housing law are addressed solely by the DHR. Consequently, it was presumed that the DHR would have a more complete data set, comprising both federal and state fair housing complaints.

Table V.4, below, presents a tabulation of data from the New York Division of Human Rights. Over the seven year time period there were 13 complaints filed, with a total of 19 bases for complaints. Although more groups are protected under New York law, fewer housing complaints appear in the data system. Overall, very few complaints have been filed in either Rome or Utica. Still, race, disability and familial status were again the three most cited bases for complaints, with nine, five, and four bases, respectively.

Table V.4
Fair Housing Complaints Filed with The Division of Human Rights
in the Cities of Rome and Utica
Basis of Complaint: Federal Fiscal 2000-2006

Year	Race	Disability	National Origin	Familial Status	Total Basis	Total Complaints
2000
2001	.	.	1	1	2	2
2002
2003	3	.	.	.	3	3
2004	1	3	.	1	5	3
2005	4	1	.	2	7	3
2006	1	1	.	.	2	2
Total	9	5	1	4	19	13

The closure status of the complaints filed with the DHR were similar to those filed with HUD. Of the 13 complaints filed, nine complaints or 69.2 percent were determined to be without cause. Three fair housing complaints were found to be substantiated, with two outcomes of predetermination conciliation, and one outcome of successful conciliation, as seen in Table V.5, below.

Table V.5
Fair Housing Complaints Filed with The Division of Human Rights
in the Cities of Rome and Utica
Disposition of the Complaint: Federal Fiscal 2000-2006

Closure Status	2000	2001	2002	2003	2004	2005	2006	Total
Conciliation/settlement successful	1	.	1
Dismissed for lack of jurisdiction	.	.	.	1	.	.	.	1
No cause determination	.	1	.	2	2	2	2	9
Predetermination conciliation	.	1	.	.	1	.	.	2
Total Complaints	.	2	.	3	3	3	2	13

The data collected from the DHR includes the specific act of alleged discrimination. Complainants may indicate multiple discriminatory issues, resulting in more issues than filed complaints. Most discriminatory issues occur within the rental market and the most cited issue is refusal to rent with seven citations, followed by eviction or the threat of eviction, with four recorded instances, as noted in Table V.6, below.

Table V.6
Fair Housing Complaints Filed with The Division of Human Rights
Issues of Complaint: Federal Fiscal 2000-2006

Issues	2000	2001	2002	2003	2004	2005	2006	Total
Discriminatory refusal to sell	0	1	0	0	0	0	0	1
Discriminatory refusal to rent	0	1	0	3	2	1	0	7
Discriminatory advertising, statements and notices	0	0	0	0	0	1	0	1
Discrimination in terms/conditions relating to rental	0	0	0	0	0	1	0	1
Eviction/Threatened Eviction	0	0	0	0	1	1	2	4
Failure to make reasonable accommodation	0	0	0	0	0	1	0	1
Total Issues	0	2	0	3	3	5	2	15

SUITS FILED BY THE DEPARTMENT OF JUSTICE

Under the Fair Housing Act, the Department of Justice (DOJ) may bring lawsuits in the following instances:

- Where there is reason to believe that a person or entity is engaged in what is termed a “pattern or practice” of discrimination, or where a denial of rights to a group of people raises an issue of general public importance;
- Where force or threat of force is used to deny or interfere with fair housing rights, the DOJ may institute criminal proceedings; and

- Where people who believe that they have been victims of an illegal housing practice file a complaint with HUD, or file their own lawsuit in federal or state court. The DOJ brings suits on behalf of individuals based on referrals from HUD.

If a complainant chooses to resolve a complaint in federal court rather than through an Administrative Law Judge with HUD or the DHR, the U.S. Department of Justice (DOJ) files the case. DOJ records do not list any cases in the Rome and Utica area within the last seven years.

RECENT FAIR HOUSING CASES IN THE CITIES OF ROME AND UTICA

In March of 2008, MHS Management Group, LLC, which owns Maplewood Garden Apartments in Rome, New York was served a court order to stop from wrongfully evicting tenants with valid leases²⁸. At least ten tenants with valid leases received notice in February stating MHS had decided to intentionally break their agreements in order to facilitate renovation plans. At this time it is yet to be seen if any specific protected class has been discriminated against. The case will be brought to trial by the Attorney General’s office and is being handled by the Assistant Attorney General In-Charge of the Utica office.

THE 2008 FAIR HOUSING SURVEY

Additional data on the fair housing profile for the Cities of Rome and Utica was gathered by conducting a scientific survey of housing experts throughout the area. The purpose of conducting the 2008 Fair Housing Survey was to add a qualitative component to the analysis in order to capture community sentiment and other information. The survey was designed to gather the knowledge, opinions, and feelings stakeholders had regarding fair housing in Rome and Utica, as well as to gauge the ability of the stakeholders to understand and affirmatively further fair housing.

Table V.7
Role of Respondents in the Housing Market
2008 Rome/Utica Fair Housing Survey

Role in Housing Market
Architect
City Assessor
Community Development Coordinator
Elected Official
Executive Director Fair Housing Council for Central NY
Home Builder
Housing Developer
In Need Service Provider/Homeless Assistance
In Need Service Provider/Realtor
Planning Director
Mortgage Loan Officer
Real Estate Broker/Property Management

²⁸ http://www.oag.state.ny.us/press/2008/mar/mar13a_08.html

Officials from the Cities of Rome and Utica developed a list of prospective participants for the 2008 Fair Housing Survey. Additional prospective contacts were added to the survey list, through referrals and after the final review about 80 individuals throughout the Rome and Utica communities were solicited, with about 68 respondents completing the telephone interviews. Respondents were drawn from a broad array of occupations and lines of work. Table V.7, at right, displays a selection of occupations, which includes architects, city officials, home builders and developers, mortgage loan officers, and Realtors. A detailed table with all occupations is presented in Appendix C, Table C.1.

Realtor
 Tenant Advocate

The initial lines of inquiry in the survey related to assessing the individuals' general perceptions of fair housing law, its usefulness, ease of use and whether respondents had come into contact with fair housing law training in their lines of work. When asked if fair housing laws served a useful purpose the majority, 89.7 percent, of persons believed these laws do serve a useful purpose. Only one respondent said fair housing laws were not useful and an additional six were unsure or didn't know how to respond. The responses to these questions are presented in Table V.8, below.

Table V.8
Understanding of Fair Housing Law
 2008 Rome/Utica Fair Housing Survey

Question	Yes	No	Don't Know	Percent Agree
Do they serve a useful purpose?	61	1	6	89.7%
Are they difficult to work with, understand or follow?	14	46	8	20.6%
Is there a specific training process to learn about fair housing laws?	41	25	2	60.3%

Respondents also expressed an opinion on fair housing laws and whether they have difficulty understanding or following these laws. When asked if fair housing laws are difficult to work with or hard to understand, 46 respondents said fair housing laws are not difficult to work with, which represents a majority, or 79.4 percent of respondents. However, 20.6 percent of respondents stated they lacked a good understanding of fair housing laws and an additional eight respondents said they didn't know. This implies nearly one third of housing experts in Utica and Rome do not have a good understanding of fair housing law. Given this lack of understanding, affirmatively furthering fair housing might be more difficult to attain without additional outreach and education.

Table V.9
What Groups Are Protected by Fair Housing Laws?
 2008 Rome/Utica Fair Housing Survey

Group	Number of Responses
-------	---------------------

Furthermore, respondents were asked whether or not there was a fair housing training process offered through their work or professional affiliation. Just over sixty percent or 41 respondents indicated they had access to fair housing training. While a systematic educational process is available to the majority of respondents, it is important to create an opportunity for all housing experts to learn about fair housing. Again, these answers are seen in Table V.8, above.

Everyone	30
Disabled	21
Low Income	21
Minorities	13
Race	12
Gender	10
Religion	9
Color	6
Ethnicity	6
Marital Status	6
Age	5
Familial Status	5

When asked which groups are considered to be protected under fair housing laws, respondents offered a variety of answers. One or more answers could be offered, with the twelve protected classes of race, creed, color, religion, disability, national origin, sexual orientation, military status, age, sex, marital status, or familial status. Table V.9, at right, presents the most cited answers, with the complete list of perceived protected classes in Appendix C, Table C.2. The most frequent answer was “everyone”, with 30 citations. The majority of the most cited answers were correct, with “disabled”, “race/minorities”, “gender”, “religion” and “familial status” all being mentioned. However, other classes were mentioned that are not protected, with some citations that were quite far from the concept of a protected class. “Persons of low-income” were noted 21 times but low income is not a protected class. These data highlight the need for additional fair housing knowledge. It is difficult to affirmatively further fair housing in the Cities of Rome and Utica without a solid understanding of who is protected under fair housing law.

Respondents were asked where they might refer someone if a housing consumer came to them and expressed that they had been a victim of an unfair housing practice. The responses to this question illuminate the need for further education and outreach. Table V.10, at right, presents the most cited responses, with a complete list of responses presented in Appendix C, Table C.3. The most cited answer was “HUD” with 16 responses, but HUD only addresses protected classes under federal law.

Table V.10
Where Would You Refer Someone Who Has
Been a Victim of Housing Discrimination?
2008 Rome/Utica Fair Housing Survey

Agency/Organization	Responses
HUD	16
Legal Aid	7
Attorney Generals Office	4
Dept of State	4
Attorney	3
City Hall	3
Don't Know	3
Attorney General	2
Codes Department	2
I'd have to do some research	2
Local Board of Realtors	2
Mayor's Office	2
NY State Attorney General's Office	2
The Housing Authority	2

A few respondents indicated they would refer fair housing victims to fair housing councils or the New York Division of Human Rights. However, the majority of responses did not cite the appropriate agency or would likely want to conduct the research themselves. This

highlights the need to inform both the public and stakeholders in the Cities of Rome and Utica of a proper referral process for pursuing a fair housing complaint.

The next sequence of survey questions pertained to concerns or reservations about fair housing in the Cities of Rome and Utica. Respondents were asked about concerns, perceived barriers or constraints and their effect on affirmatively furthering fair housing. Table V.11, below, presents this data.

Table V.11
Concerns, Barriers, or Constraints Affecting Fair Housing
 2008 Rome/Utica Fair Housing Survey

Question	Yes	No	Don't Know	Percent Agree
Do you have concerns or reservations about fair housing?	32	35	1	47.1%
Are there barriers or constraints to affirmatively furthering fair housing?	25	36	6	37.3%
Specific instances involving unfair housing or housing discrimination?	10	53	5	14.7%

Just under a majority of respondents, 47.1 percent indicated they had concerns or reservations about fair housing. There were a total of 25 individuals who said there existed barriers or constraints to affirmatively furthering fair housing. However, only 14.7 percent of respondents knew of specific instances involving unfair housing or housing discrimination.

As a follow up question, respondents were requested to cite specific fair housing concerns. From the 32 persons who expressed specific concerns, two common themes emerged, which were racism/prejudice in the community towards Blacks, Hispanics and immigrants and a general lack of knowledge about fair housing laws. A complete list of cited concerns can be found in data Appendix C, Table C.4.

With regards to perceived barriers to affirmatively furthering fair housing, the 25 respondents who indicated barriers existed cited a host of specific examples. Several common barriers were mentioned, including the inability to communicate with non-English speaking residents, lack of education and knowledge about fair housing law, discrimination in neighborhoods, and few economic opportunities for low income residents. A comprehensive list of all cited barriers is presented in data Appendix C, Table C.5.

However, there seems to be a misunderstanding between the concepts of *fair housing* and *affordable housing*. A few responses dealt with issues that are not directly related to fair housing, but are more in line with affordable housing issues. While it may be perceived that housing is unaffordable to certain racial and ethnic segments of the population, it is not necessarily an issue of fair housing. Again, this highlights the need for further education on fair housing laws in the Rome and Utica communities.

The next set of concepts deal with perceived policies and regulations of local, county or state governments that adversely affect or represent barriers to fair housing laws. These data are presented in Table V.12, below.

Table V.12
Policies, Regulations and Non-Compliance Issues
2008 Rome/Utica Fair Housing Survey

Question	Yes	No	Don't Know	Percent Agree
Do you feel the City, County, or State have adverse policies towards fair housing?	16	40	11	23.9%
Are you aware of non-compliance issues with public housing authorities?	5	64	0	7.2%
Are there codes or regulations that represent barriers to fair housing?	11	49	7	16.4%

When asked if the city, county or state have policies which adversely effect affirmatively furthering fair housing, 16 respondents or 23.9 percent, said there were such policies or regulations. However, most of the mentioned policies had little to do with fair housing, but rather addressed issues of affordable housing, local bureaucracy and politics. Some respondents did mention issues directly applicable to fair housing, citing that government does not have enough information on fair housing problems and is inefficient and lacks coordination when dealing with fair housing needs. Table C.7 in Appendix C presents all mentioned policy and regulatory issues in full.

There were only five respondents who were aware of non-compliance issues with public housing authorities. Discrimination against Blacks and disabled persons represented the majority of specific non-compliance issues. In addition, five respondents indicated there were codes or regulations that restricted fair housing in the Rome and Utica region. Zoning regulations and accessibility requirements for the disabled were the emergent themes among regulatory barriers. Tables C.8 and C.9 in Appendix C, present all mentioned issues for these two concepts.

Another question in the 2008 Fair Housing Survey addressed the respondents' perception of the adequacy of the current level of outreach and education. Respondents were asked to rank the current degree of fair housing education and outreach in Rome and Utica. As seen in Table V.13, at right, 31 respondents or 46.3 percent indicated there was too little outreach in the community. Twelve

Table V.13
Need for Education and Outreach
2008 Rome/Utica Fair Housing Survey

Degree of Need	Responses
Too Much	0
Just Right	24
Too Little	31
Don't Know/No Answer	12
Total	67

respondents were unaware of any outreach or education in the community, and no respondents indicated there was too much education/outreach occurring in the community. Housing stakeholders in the Cities of Rome and Utica have specifically mentioned the need for increased education about fair housing laws in previous concepts. This question provides additional quantitative evidence for increasing community outreach and education as well as indicating there is sufficient local support for such services.

Respondents were also asked about whether they were aware of any enforcement activities, particularly as it relates to fair housing testing. First, three types of testing were defined for the respondent, as follows:

Complaint-based testing: After receipt of a housing complaint, the entity processing the housing complaint conducts a test to evaluate the validity of the alleged fair housing violation. One or more testers will call on the housing provider and inquire as to the availability of the housing. The actions of the housing provider are recorded and compared among testers to assess consistent or inconsistent behavior. This particular practice is seen as a valid way to determine cause and can further substantiate administrative or legal proceedings, if required.

Random Testing: Random testing usually occurs without a complaint being brought forward first. Similar to complaint-based testing, one or more testers will call on a selected housing provider and inquire as to the availability of the housing. The actions of the housing provider are recorded and compared among testers to assess consistent or inconsistent behavior.

Audit Testing has been implemented in two separate fashions. For enforcement, it represents on-site evaluation of new construction to verify that the unit is in compliance with ADA and fair housing accessibility guidelines. This enhances long-term accessibility, knowledge of proper building requirements, as well as limiting future liability. On the other hand, this type of testing can also be useful when designing efficient outreach and education activities, thereby better understanding how to approach educating both builders and providers within a particular housing sub-market. It may also be undertaken to evaluate property managers across multiple facilities, evaluating a particular type of discriminatory action. Testing in this manner can provide an opportunity to enhance fair housing education, or bring to light prospective actions that may have become embedded in a particular segment of a housing market.

The goal of this question was to evaluate which type of testing was best understood and which might be preferred by the respondents. The majority of respondents, 83.6 percent, said they were unaware of any testing activities at all, as seen in Table V.14, at right. With so few persons aware of the concept of testing and enforcement, additional determinations on the type of testing that may be necessary is not warranted at this time.

Table V.14

**Need for Education and Outreach
2008 Rome/Utica Fair Housing Survey**

Aware of Testing?	Responses
Yes	11
No	53
Don't Know/No Answer	3
Percent Aware of Testing	16.4%

The last two concepts examined in the 2008 Fair Housing Survey addressed whether the stakeholders were aware of any fair housing planning in the Cities of Rome and Utica, and whether current fair housing laws needed to be strengthened. These results are presented in Table V.15, below.

Table V.15

**Fair Housing Plans and Laws
2008 Rome/Utica Fair Housing Survey**

Question	Yes	No	Don't Know	Percent Agree
Aware of Fair Housing Plans?	15	50	2	22.4%
Do Fair Housing laws need to be strengthened?	16	30	21	23.9%

When stakeholders were asked if they were aware of any Fair Housing Plans, only 22.4 percent of respondents were aware of such plans. This result reinforces the notion that there exists a need for enhancing fair housing outreach and education.

The last question of the survey asked if fair housing laws needed to be strengthened. Only 16 respondents said fair housing laws needed to be strengthened, which represented 23.9 percent of stakeholders. While 30 respondents said fair housing laws did not need to be strengthened, 21 respondents didn't know, or felt unable to give an informed answer. This again points to the need to increase education and community outreach on fair housing issues.

THE 2008 FAIR HOUSING FORUMS

During the week of April 7, 2008, Fair Housing Forums were hosted in both Utica and Rome. At each of these public meetings, selected preliminary findings of the Analysis of Impediments were presented, and a representative of the Fair Housing Council of Central New York also made a presentation on fair housing issues.

Most of the findings of the aforementioned Fair Housing Surveys were reported. Emphasis was placed on the lack of outreach and education for stakeholders, housing consumers and providers throughout the area. The fair housing forums also illuminated the need for increased outreach and education about fair housing law. The forums also highlighted the general misunderstanding in the community between the concepts of fair and affordable housing.

SUMMARY

Housing complaint data received from HUD and the New York Division of Human Rights indicate there appears to be some level of housing discrimination. Both data sources had cases where discrimination was determined to exist. The discriminatory actions most frequently occur in the rental market and are associated with refusal to rent and unlawful eviction. The protected classes most cited in the complaint data are Race, Disability, and Familial Status.

Qualitative analysis from 2008 Fair Housing Survey revealed two important themes: The need for additional outreach and education and the confusion between the concepts of fair and affordable housing. As a result, there tends to be a lack of understanding of fair housing law, who is protected under the law and what to do in the event of an alleged fair housing violation. To affirmatively further fair housing in the Rome and Utica region, these issues must be addressed.

SECTION VI. IMPEDIMENTS AND SUGGESTED ACTIONS

OVERVIEW OF FINDINGS

Racial minorities in the Rome and Utica region account for 17.5 percent of the population, with the African-America population comprising the bulk of those persons classified as minorities. The African-American population is not distributed evenly within the Rome and Utica area. There are several areas with disproportionately high concentrations of African-Americans, especially in Utica. The same is true for the spatial distribution for the population in poverty, which is clustered into areas with a disproportionately high degree of poverty. This is not true for the region's Hispanic population, which, with the exception of four areas, is spread uniformly across the region. The percentage of households with a cost burden is comparable to the national average, with the notable exception of severely cost burdened renter occupied households, which exceeds the national average by five percentage points.

Racial and ethnic minorities tend to face much higher rates of denials for homeownership mortgage loan applications than whites. This is true even when level of income is taken into account. For all racial groups, the most cited reason for denial is credit history, with debt-to-income ratio the second most cited reason. Applications to sub-prime lenders increased more quickly than the applications to traditional lenders, but still only accounted for 7.5 percent of total applications. Racial and ethnic minorities also have a higher proportion of high annual percentage rate loans, also characterized as predatory loans, than whites, which may increase the financial strain on this population.

Housing Complaint data received from HUD and the New York Division of Human Rights indicate that there is housing discrimination in the Rome and Utica area. Discriminatory actions most frequently occur in the rental market and are associated with the refusal to rent and eviction or threatened eviction. The protected classes most cited as being discriminated against are Race, Disability and Familial Status.

The 2008 Fair Housing Survey found a lack of understanding of fair housing law, who is protected under the law and what to do in the event of an alleged fair housing violation. Fair housing dialogue is often confused with affordable housing, landlord/tenant issues and local politics. As a result, more education and outreach is necessary to affirmatively further fair housing.

IDENTIFIED IMPEDIMENTS TO FAIR HOUSING CHOICE

The 2008 Analysis of Impediments to Fair Housing Choice for the Cities of Rome and Utica uncovered several issues that can be considered to be barriers to affirmatively furthering fair housing and impediments to fair housing choice. These are as follows:

1. Lack of an adequate fair housing service delivery system
 - a. Limited use of existing capacity for conducting outreach and education activities
 - b. Lack of knowledge by experts and stakeholders of where to refer people who have indicated that they felt a victim of an unfair housing practice
 - c. Lack of access to fair housing complaint system
 - d. Lack of testing and enforcement capacity and activities, due to lack of use of existing capacity (Fair Housing Council of Central New York)
2. Lack of public awareness of fair housing rights and fair housing services
 - a. Lack of understanding of State and Federal fair housing law
 - i. Some are uncertain of who or what groups are protected under the law
 - ii. Uncertain or lack of knowledge of what actions constitute violations of fair housing law
 - b. Lack of uniformity in referrals for prospective victims of housing discrimination
3. High home mortgage loan denial rates for selected minorities, particularly for Blacks and Hispanics
 - a. Especially high denial rates in sub-prime mortgage lending markets
 - b. Concerned about originations in minority areas
4. Some unlawful discrimination appears to be occurring in rental markets
 - a. Discriminatory terms and conditions in rental markets
5. Abuse of landlord/tenant law
 - a. Perceived reluctance to make requested or necessary repairs
 - b. With less than affordable rental markets, tenants tend to have few choices for recourse
6. Significant confusion about the difference between:
 - a. Affirmatively furthering fair housing (E&O, testing, enforcement)
 - b. Promotion and provision of available and affordable housing
 - i. Not directly a housing discrimination issue as it does not relate to constraining choice *because* of protected class status; choice is curtailed due to housing price/household income considerations
 - c. New York landlord tenant law
 - i. Rights and obligations of both providers and consumers of housing
 - ii. Lack of understanding of responsibilities of both parties to rental agreement

SUGGESTED ACTIONS FOR THE CITIES OF ROME AND UTICA TO CONSIDER

1. Assist in improving fair housing delivery system
 - a. Consider providing periodic or short-term temporary access to private office space for a part-time fair housing walk-in center, manned by a representative of the Fair Housing Center of Central New York (FHC).
 - i. Such as one half day per month.
 - b. Arrange for on-site fair housing training from the FHC
 - i. Have City staff receive training first
 - c. Design a simple set of instructions for uniform fair housing referral system

- i. Include contact numbers, definitions of discriminatory actions and what represents protected class status.
 - ii. Distribute these materials to individuals, advocates, interested parties, and government entities throughout the region
 - d. Assist in orchestrating fair housing training sessions from the FHC within the two cities
 - i. Target city zoning, planning and housing and community development staff so that they may become more familiar with fair housing
 - ii. Expand to developers, builders, and landlords throughout the two cities so that they too can become more familiar with Fair Housing
 2. Assist in improving public awareness of fair housing and land/lord tenant law
 - a. Acquire and distribute fair housing flyers and pamphlets, including materials about landlord tenant law, to social service agencies, residential rental property agencies, faith-based organizations, Hispanic advocate and service agencies, and other entities
 - i. Some materials should represent posters highlighting the fair housing referral system, discriminatory actions, and protected class status
 - b. Coordinate and consult with the FHC as to their experience to best present prospective fair housing sessions designed for the public and solicit stakeholders and others to join in with raising public awareness
 3. Consider enhancing first-time homebuyer training program
 - a. Conduct outreach and education for prospective homebuyers
 - b. Address establishing good credit and the wise use of credit
 - i. Include discussion that helps to make prospective credit consumers aware of what constitutes predatory lending practices
 4. Incorporate more formalized elements of fair housing planning in Consolidated Plan
 - a. Devote chapter or section of proposed actions, with milestones and guidelines
 - b. Include Fair Housing in public review process for Consolidated Plan
 - c. Publish the Analysis of Impediments to Fair Housing Choice

APPENDIX A. CENSUS DATA

Table A.1
Population by Age and Gender
 Census 2000 SF1 Data

Place	Under 14	15 to 24	25 to 44	45 to 54	55 to 64	65 and Over	Total
Rome							
Male	3,285	2,306	6,084	2,343	1,550	2,341	17,909
Female	3,126	1,995	4,357	2,253	1,655	3,655	17,041
Total	6,411	4,301	10,441	4,596	3,205	5,996	34,950
Utica							
Male	6,262	4,044	8,144	3,479	2,373	4,210	28,512
Female	6,090	4,282	8,134	3,705	2,717	7,211	32,139
Total	12,352	8,326	16,278	7,184	5,090	11,421	60,651
Total							
Male	9,547	6,350	14,228	5,822	3,923	6,551	46,421
Female	9,216	6,277	12,491	5,958	4,372	10,866	49,180
Total	18,763	12,627	26,719	11,780	8,295	17,417	95,601

Table A.2
Population by Race in the City of Utica
 Census 2000 SF1 Data

City	Census Tract	Block Group	White	Black	American Indian	Asian	Native Hawaiian	Other	Two or More Races	Total	Hispanic or Latino
Utica	201	1	715	133	3	0	0	35	22	908	64
Utica	201	2	392	168	0	4	0	18	7	589	56
Utica	201	3	4	0	0	0	0	0	0	4	0
Utica	203	1	400	186	2	14	0	18	27	647	36
Utica	203	2	410	218	1	40	0	19	36	724	42
Utica	207.01	1	357	186	4	112	0	29	49	737	96
Utica	207.01	2	297	433	2	49	0	15	18	814	58
Utica	207.01	3	814	365	8	49	1	25	68	1,330	94
Utica	207.02	1	675	186	5	20	0	20	37	943	63
Utica	207.02	2	877	44	0	21	0	19	21	982	33
Utica	207.02	3	1,015	73	5	11	0	10	33	1,147	27
Utica	207.02	5	690	179	4	23	0	12	24	932	37
Utica	208.02	1	812	54	2	9	3	41	33	954	103
Utica	208.02	2	653	35	4	1	0	17	62	772	74
Utica	208.02	3	645	68	1	28	0	39	34	815	105
Utica	208.02	4	818	138	1	26	1	42	53	1,079	166
Utica	208.03	2	536	158	6	86	0	72	59	917	193
Utica	208.03	3	657	103	0	47	0	41	25	873	107
Utica	208.03	4	604	114	2	25	0	15	48	808	44
Utica	209	1	939	131	10	33	0	49	29	1,191	113
Utica	209	1	741	143	19	5	0	27	57	992	83
Utica	210	1	429	138	2	64	0	65	22	720	123
Utica	210	2	625	202	7	35	1	42	32	944	111
Utica	211.01	1	902	224	6	33	2	21	40	1,228	93
Utica	211.02	1	493	174	3	4	2	24	35	735	56
Utica	211.02	2	551	141	0	3	0	5	9	709	17
Utica	211.02	3	389	55	0	3	0	10	23	480	18
Utica	211.02	4	427	80	3	2	0	12	21	545	40
Utica	211.03	1	1,087	148	4	17	0	28	39	1,323	57
Utica	212.01	1	456	142	0	17	0	33	66	714	65
Utica	212.01	2	309	200	1	21	1	23	22	577	35
Utica	212.01	3	124	224	1	23	0	15	11	398	35
Utica	212.02	1	623	321	2	111	7	53	73	1,190	87
Utica	212.02	2	999	203	3	55	0	14	40	1,314	33
Utica	213.01	1	591	8	0	2	0	0	0	601	0
Utica	213.01	2	1,812	131	1	9	0	58	71	2,082	146
Utica	213.01	3	713	8	1	16	0	3	11	752	8
Utica	213.02	1	550	22	0	7	0	5	4	588	17
Utica	213.02	2	534	12	0	0	0	11	15	572	28
Utica	213.02	3	948	32	0	36	0	35	52	1,103	69
Utica	213.02	4	1,129	83	2	31	0	37	71	1,353	68
Utica	213.03	1	1,214	63	0	17	0	7	11	1,312	28
Utica	213.03	2	619	3	0	8	0	4	4	638	7
Utica	213.03	3	781	3	1	8	0	7	23	823	20

Table A.2 Cont.
Population by Race in the City of Utica
 Census 2000 SF1 Data

City	Census Tract	Block Group	White	Black	American Indian	Asia	Native Hawaiian	Other	Two or More Races	Total	Hispanic or Latino
Utica	214.01	1	1,064	174	11	8	0	30	28	1,315	91
Utica	214.01	2	598	34	3	3	0	13	14	665	32
Utica	214.01	3	1,136	127	2	28	1	27	20	1,341	78
Utica	214.02	1	1,089	154	4	3	2	16	27	1,295	49
Utica	214.02	2	652	19	2	6	0	2	2	683	27
Utica	214.04	1	0	0	0	0	0	0	0	0	0
Utica	214.04	9	247	36	8	0	0	0	4	295	5
Utica	215	1	185	295	1	10	1	40	22	554	60
Utica	215	2	229	187	2	14	0	10	20	462	34
Utica	215	3	225	244	2	4	0	8	42	525	29
Utica	215	4	196	342	2	10	0	3	36	589	36
Utica	216.01	1	1,500	90	2	24	2	15	26	1,659	52
Utica	216.01	2	1,655	46	1	15	1	4	13	1,735	21
Utica	216.01	3	1,268	82	0	20	0	6	22	1,398	44
Utica	216.01	9	422	16	0	6	0	2	1	447	6
Utica	216.02	1	1,407	23	0	7	0	9	7	1,453	23
Utica	216.02	2	775	16	3	9	0	2	5	810	9
Utica	217.01	1	1,873	53	1	16	0	1	11	1,955	23
Utica	217.01	2	666	10	1	3	4	0	9	693	0
Utica	217.01	3	843	3	0	3	0	0	2	851	10
Utica	217.02	1	1,217	38	5	12	0	6	23	1,301	45
Utica	217.02	2	642	7	0	15	0	5	3	672	17
Utica	217.02	3	921	110	4	0	0	35	24	1,094	64

Table A.3
Population by Race in the City of Rome
 Census 2000 SF1 Data

City	Census Tract	Block Group	White	Black	American Indian	Asian	Native Hawaiian	Other	Two or More Races	Total	Hispanic
Rome	218	1	832	28	0	5	1	8	28	902	26
Rome	219	1	527	18	1	3	0	10	22	581	24
Rome	219	2	252	42	2	1	0	5	9	311	23
Rome	219	3	856	66	4	4	0	5	26	961	45
Rome	220	1	1,106	44	0	13	0	3	10	1,176	33
Rome	220	2	1,092	97	0	8	1	69	24	1,291	110
Rome	220	3	1,011	42	7	3	1	24	13	1,101	38
Rome	221	1	1,696	34	1	6	0	10	30	1,777	18
Rome	221	2	1,006	11	0	7	0	2	13	1,039	6
Rome	222	1	668	14	0	10	0	0	9	701	5
Rome	222	2	798	6	1	7	0	0	2	814	3
Rome	222	3	1,202	27	10	11	0	3	10	1,263	29
Rome	223	1	531	59	7	0	0	13	15	625	33
Rome	223	2	582	48	4	2	0	22	17	675	31
Rome	223	3	484	18	1	4	0	5	20	532	28
Rome	223	4	540	16	0	7	0	12	14	589	23
Rome	223	5	717	49	3	7	0	21	25	822	30
Rome	224	1	1,586	141	7	23	2	7	29	1,795	27
Rome	224	2	697	12	0	3	0	1	3	716	10
Rome	224	3	481	9	1	3	0	3	13	510	19
Rome	224	4	515	14	0	5	0	0	2	536	3
Rome	225	1	503	13	0	5	0	7	8	536	14
Rome	225	2	1,025	137	2	14	0	12	26	1,216	44
Rome	225	3	516	38	1	15	0	1	13	584	10
Rome	225	5	1,417	114	10	18	0	19	39	1,617	43
Rome	226	9	472	80	1	2	0	11	30	596	37
Rome	227.01	1	1,889	47	6	26	0	9	33	2,010	46
Rome	221.02	1	330	3	0	7	0	0	4	344	1
Rome	227.02	2	1,636	78	0	41	0	9	42	1,806	45
Rome	227.02	3	467	2	1	0	0	0	3	473	3
Rome	227.02	9	1,562	44	0	12	0	8	11	1,637	48
Rome	228	1	2,221	1,292	21	25	1	171	161	3,892	776
Rome	228	2	1,434	6	2	12	0	3	11	1,468	17
Rome	229	1	53	1	0	0	0	0	0	54	0

Table A.4
Poverty by Age in the City of Utica
 Census 2000 SF3 Data

City	Census Tract	Block Group	Five and Under	6 to 11	12 to 17	18 to 64	65 to 74	75 and Older	Total	Poverty Rate
Utica	201	1	103	36	30	241	0	34	444	49.4%
Utica	201	2	69	9	17	84	15	23	217	36.9%
Utica	201	3	0	0	0	0	0	0	0	0.0%
Utica	203	1	8	0	20	205	12	37	282	42.2%
Utica	203	2	5	21	30	288	0	0	344	49.1%
Utica	207.01	1	36	98	33	243	0	0	410	55.2%
Utica	207.01	2	14	69	25	118	0	8	234	27.1%
Utica	207.01	3	45	52	91	273	7	0	468	44.2%
Utica	207.02	1	48	57	16	115	7	0	243	25.5%
Utica	207.02	2	36	10	9	75	5	8	143	15.2%
Utica	207.02	3	31	29	0	44	12	0	116	10.9%
Utica	207.02	5	18	26	22	174	0	7	247	27.4%
Utica	208.02	1	25	35	47	128	0	17	252	28.3%
Utica	208.02	2	39	48	28	104	6	33	258	32.4%
Utica	208.02	3	7	28	14	61	23	13	146	18.2%
Utica	208.02	4	34	28	87	147	0	26	322	29.1%
Utica	208.03	2	127	87	32	216	7	0	469	48.0%
Utica	208.03	3	72	28	9	167	15	8	299	35.8%
Utica	208.03	4	24	22	29	107	5	6	193	24.1%
Utica	209	1	64	87	24	224	6	0	405	33.0%
Utica	209	1	50	54	20	193	7	0	324	34.0%
Utica	210	1	28	34	6	85	59	77	289	41.3%
Utica	210	2	38	10	60	224	16	13	361	38.5%
Utica	211.01	1	58	35	22	367	10	5	497	41.5%
Utica	211.02	1	5	4	5	106	6	16	142	18.3%
Utica	211.02	2	0	6	10	106	8	0	130	36.5%
Utica	211.02	3	15	28	29	58	0	13	143	31.0%
Utica	211.02	4	42	54	31	159	4	0	290	48.4%
Utica	211.03	1	123	34	13	159	12	4	345	28.3%
Utica	212.01	1	27	22	66	96	7	5	223	30.2%
Utica	212.01	2	68	70	15	128	0	17	298	49.5%
Utica	212.01	3	28	34	12	66	5	10	155	42.3%
Utica	212.02	1	30	33	52	121	6	0	242	20.7%
Utica	212.02	2	7	55	38	98	7	10	215	16.6%
Utica	213.01	1	0	0	0	0	0	0	0	0.0%
Utica	213.01	2	157	182	148	420	12	32	951	45.6%
Utica	213.01	3	16	0	0	40	12	0	68	9.1%
Utica	213.02	1	5	0	6	41	8	13	73	13.0%
Utica	213.02	2	0	0	4	24	0	21	49	9.0%
Utica	213.02	3	81	46	18	117	32	40	334	29.7%
Utica	213.02	4	67	54	34	206	17	14	392	28.2%
Utica	213.03	1	4	9	7	82	4	25	131	12.8%
Utica	213.03	2	7	4	0	9	0	0	20	3.3%
Utica	213.03	3	8	0	17	17	0	0	42	4.9%

Table A.4, Cont.
Poverty by Age in the City of Utica
 Census 2000 SF3 Data

City	Census Tract	Block Group	Five and Under	6 to 11	12 to 17	18 to 64	65 to 74	75 and Older	Total	Poverty Rate
Utica	214.01	1	20	33	9	230	20	15	327	25.6%
Utica	214.01	2	24	18	22	46	0	9	119	18.8%
Utica	214.01	3	25	23	13	21	0	16	98	15.2%
Utica	214.02	1	52	30	49	191	21	7	350	25.9%
Utica	214.02	2	4	5	0	5	0	0	14	2.4%
Utica	214.04	1	0	0	0	0	0	0	0	0.0%
Utica	214.04	9	0	0	0	0	0	0	0	0.0%
Utica	215	1	82	64	37	108	0	9	300	50.7%
Utica	215	2	12	15	23	55	6	15	126	27.5%
Utica	215	3	18	36	55	183	7	5	304	53.8%
Utica	215	4	37	95	40	105	0	0	277	45.2%
Utica	216.01	1	8	64	0	98	0	0	170	10.1%
Utica	216.01	2	0	16	0	32	10	0	58	3.3%
Utica	216.01	3	11	0	20	43	16	50	140	10.6%
Utica	216.01	9	22	0	0	16	0	27	65	14.9%
Utica	216.02	1	0	13	5	24	8	11	61	4.1%
Utica	216.02	2	0	5	6	7	0	7	25	3.1%
Utica	217.01	1	8	0	6	46	18	23	101	6.2%
Utica	217.01	2	0	0	0	0	0	0	0	0.0%
Utica	217.01	3	0	6	7	23	0	6	42	5.0%
Utica	217.02	1	12	0	12	93	6	7	130	9.9%
Utica	217.02	2	0	0	0	0	0	6	6	0.9%
Utica	217.02	3	65	15	10	126	12	7	235	21.6%

Table A.5
Poverty by Age in the City of Rome
 Census 2000 SF3 Data

City	Census Tract	Block Group	Five and Under	6 to 11	12 to 17	18 to 64	65 to 74	75 and Older	Total	Poverty Rate
Rome	218	1	38	10	4	115	36	43	246	28.1%
Rome	219	1	17	0	0	34	0	0	51	8.4%
Rome	219	2	0	5	33	65	9	22	134	37.7%
Rome	219	3	25	0	42	118	13	0	198	21.1%
Rome	220	1	12	19	5	76	0	0	112	9.4%
Rome	220	2	66	88	54	265	0	0	473	38.9%
Rome	220	3	67	45	42	137	12	10	313	28.7%
Rome	221	1	17	24	20	101	0	0	162	9.7%
Rome	221	2	0	0	0	10	0	9	19	1.9%
Rome	222	1	0	0	0	6	0	13	19	3.4%
Rome	222	2	0	0	4	0	0	0	4	0.5%
Rome	222	3	0	0	15	17	0	0	32	2.9%
Rome	223	1	61	54	6	95	0	7	223	37.6%
Rome	223	2	20	17	0	120	7	17	181	25.1%
Rome	223	3	9	0	10	73	0	0	92	17.0%
Rome	223	4	23	6	23	52	7	0	111	19.6%
Rome	223	5	56	56	22	94	5	8	241	36.2%
Rome	224	1	20	23	6	121	11	14	195	11.5%
Rome	224	2	7	14	7	35	0	6	69	9.7%
Rome	224	3	10	23	13	29	0	0	75	14.7%
Rome	224	4	0	0	0	6	6	7	19	3.4%
Rome	225	1	26	19	12	78	8	0	143	24.9%
Rome	225	2	63	26	58	153	0	0	300	25.0%
Rome	225	3	0	0	10	31	0	7	48	7.7%
Rome	225	5	40	71	23	265	25	24	448	28.7%
Rome	226	9	40	32	33	86	0	5	196	34.6%
Rome	227.01	1	40	4	24	52	21	15	156	8.3%
Rome	221.02	1	0	0	0	0	0	0	0	0.0%
Rome	227.02	2	0	0	0	27	7	0	34	1.9%
Rome	227.02	3	0	0	0	11	0	0	11	2.3%
Rome	227.02	9	6	5	0	77	7	0	95	5.8%
Rome	228	1	0	0	6	74	0	9	89	6.4%
Rome	228	2	51	11	12	120	18	0	212	14.4%
Rome	229	1	0	0	0	27	0	0	27	50.9%

Table A.6
Owner Occupied Housing Units: Occupants per Room
 Census 2000 SF3 Data

Place	0.50 or less Occupants Per Room	0.51 to 1.00 Occupants Per Room	1.01 to 1.50 Occupants Per Room	1.51 to 2.00 Occupants Per Room	2.01 or more Occupants Per Room	Total Occupied Housing Units
Rome City	6,212	1,553	16	13	0	7,794
Utica City	9,655	2,453	93	36	16	12,253
Total	15,867	4,006	109	49	16	20,047

Table A.7
Renter Occupied Housing Units: Occupants per Room
 Census 2000 SF3 Data

Place	Persons per Room					Total Occupied Housing Units
	0.50 or less	0.51 to 1.00	1.01 to 1.50	1.51 to 2.00	2.01 or more	
Rome City	4,006	1,708	131	4	34	5,883
Utica City	9,003	3,342	361	88	29	12,823
Total	13,009	5,050	492	92	63	18,706

Table A.8
Gross Rent as a Percentage of Household Income
 Census 2000 SF3 Data

Place	Less Than 10 Percent	10.0 to 14.9 Percent	15.0 to 19.9 Percent	20.0 to 24.9 Percent	25.0 to 29.9 Percent	30.0 to 34.9 Percent	35.0 to 39.9 Percent	40.0 to 49.9 Percent	50.0 Percent or More	Not Computed	Total
Rome City	342	838	910	573	677	428	300	296	1,199	282	5,845
Utica City	748	1,254	1,461	1,143	1,250	1,033	699	955	3,368	901	12,812
Total	1,090	2,092	2,371	1,716	1,927	1,461	999	1,251	4,567	1,183	18,657

Table A.9
Monthly Owner Costs as a Percentage of Household Income: Housing Units with Mortgage
 Census 2000 SF3 Data

Place	Less Than 10 Percent	10.0 to 14.9 Percent	15.0 to 19.9 Percent	20.0 to 24.9 Percent	25.0 to 29.9 Percent	30.0 to 34.9 Percent	35.0 to 39.9 Percent	40.0 to 49.9 Percent	50.0 Percent or More	Not Computed	Total
Rome City	214	682	874	715	428	185	109	157	266	7	3,637
Utica City	369	746	897	755	538	397	180	277	467	30	4,656
Total	583	1,428	1,771	1,470	966	582	289	434	733	37	8,293

Table A.10
Monthly Owner Costs as a Percentage of Household Income: Housing Units without Mortgage
 Census 2000 SF3 Data

Place	Less Than 10 Percent	10.0 to 14.9 Percent	15.0 to 19.9 Percent	20.0 to 24.9 Percent	25.0 to 29.9 Percent	30.0 to 34.9 Percent	35.0 to 39.9 Percent	40.0 to 49.9 Percent	50.0 Percent or More	Not Computed	Total
Rome City	803	589	409	204	198	84	66	75	171	28	2,627
Utica City	1,437	1,002	571	276	282	150	89	128	207	27	4,169
Total	2,240	1,591	980	480	480	234	155	203	378	55	6,796

APPENDIX B. HMDA DATA

Table B.1
Owner Occupied Home Purchase Loan Applications by Selected Action Taken by Race
 Rome and Utica Cities
 HMDA Data 2001-2006

Action Taken	American Indian or Alaskan Native	Asian or Pacific Islander	Black	Hispanic (Race)	White	Other	Not Provided by Applicant	Not Applicable	Total	Hispanic (Ethnicity)
2001 Loan Originated	2	11	21	17	510	10	65	4	640	.
2001 Application Denied	0	7	12	3	93	3	37	1	156	.
2001 Denial Rate %	0.0%	38.9%	36.4%	15.0%	15.4%	23.1%	36.3%	20.0%	19.6%	.
2002 Loan Originated	1	12	26	12	599	6	25	1	682	.
2002 Application Denied	1	0	4	5	87	3	39	0	139	.
2002 Denial Rate %	50.0%	0.0%	13.3%	29.4%	12.7%	33.3%	60.9%	0.0%	16.9%	.
2003 Loan Originated	0	21	15	23	667	12	43	.	781	.
2003 Application Denied	1	5	5	4	88	1	15	.	119	.
2003 Denial Rate %	100.0%	19.2%	25.0%	14.8%	11.7%	7.7%	25.9%	.	13.2%	.
2004 Loan Originated	0	17	26	.	697	.	41	5	786	21
2004 Application Denied	2	4	12	.	100	.	22	5	145	7
2004 Denial Rate %	100.0%	19.0%	31.6%	.	12.5%	.	34.9%	50.0%	15.6%	25.0%
2005 Loan Originated	1	24	29	.	700	.	45	.	799	30
2005 Application Denied	0	8	5	.	121	.	28	.	162	25
2005 Denial Rate %	0.0%	25.0%	14.7%	.	14.7%	.	38.4%	.	16.9%	45.5%
2006 Loan Originated	4	21	32	.	767	.	34	.	858	36
2006 Application Denied	2	6	13	.	166	.	25	.	212	33
2006 Denial Rate %	33.3%	22.2%	28.9%	.	17.8%	.	42.4%	.	19.8%	47.8%
Total Loan Originated	8	106	149	52	3,940	28	253	10	4,546	87
Total Application Denied	6	30	51	12	655	7	166	6	933	65
Total Denial Rate %	42.9%	22.1%	25.5%	18.8%	14.3%	20.0%	39.6%	37.5%	17.0%	42.8%

Table B.2
Owner Occupied Home Purchase Loan Applications
by Selected Action Taken by Gender
Rome and Utica Cities
Data 2001 - 2006

Action Taken	Male	Female	Not Provided by Applicant	Not Applicable	Total
2001 Loan Originated	407	171	61	1	640
2001 Application Denied	74	51	31	0	156
2001 Denial Rate %	15.4%	23.0%	33.7%	0.0%	19.6%
2002 Loan Originated	461	204	17	.	682
2002 Application Denied	68	40	31	.	139
2002 Denial Rate %	12.9%	16.4%	64.6%	.	16.9%
2003 Loan Originated	511	250	20	.	781
2003 Application Denied	64	43	12	.	119
2003 Denial Rate %	11.1%	14.7%	37.5%	.	13.2%
2004 Loan Originated	477	289	20	0	786
2004 Application Denied	71	62	8	4	145
2004 Denial Rate %	13.0%	17.7%	28.6%	100.0%	15.6%
2005 Loan Originated	530	245	24	.	799
2005 Application Denied	107	45	10	.	162
2005 Denial Rate %	16.8%	15.5%	29.4%	.	16.9%
2006 Loan Originated	543	301	14	.	858
2006 Application Denied	131	65	16	.	212
2006 Denial Rate %	19.4%	17.8%	53.3%	.	19.8%
Total Loan Originated	2,929	1,460	156	1	4,546
Total Application Denied	515	306	108	4	933
Total Denial Rate %	15.0%	17.3%	40.9%	80.0%	17.0%

Table B.3
Originated and Denied Loan Applications by Type of Lender
Rome and Utica Cities
HMDA Data 2001 - 2006

Type of Lender		2001	2002	2003	2004	2005	2006	Total
Prime Lender	Loan Originated	616	664	751	753	757	818	4,359
	Application Denied	87	104	82	109	125	156	663
	Denial Rate	12.4%	13.5%	9.8%	12.6%	14.2%	16.0%	13.2%
Subprime Lender	Loan Originated	14	16	23	33	42	40	168
	Application Denied	39	18	21	36	37	56	207
	Denial Rate	73.6%	52.9%	47.7%	52.2%	46.8%	58.3%	55.2%
Manufactured Home Lender	Loan Originated	10	2	7	.	.	.	19
	Application Denied	30	17	16	.	.	.	63
	Denial Rate	75.0%	89.5%	69.6%	.	.	.	76.8%
Total	Loan Originated	640	682	781	786	799	858	4,546
	Application Denied	156	139	119	145	162	212	933
	Denial Rate	19.6%	16.9%	13.2%	15.6%	16.9%	19.8%	17.0%

Table B.4
Prime Lender Owner Occupied Home Purchase Loan Applications:
Originated and Denied
Rome and Utica Cities
HMDA Data 2001-2006

Action Taken	American Indian or Alaskan Native	Asian or Pacific Islander	Black	Hispanic (Race)	White	Other	Not Provided by Applicant	Not Applicable	Total	Hispanic (Ethnicity)
2001 Loan Originated	2	11	19	17	496	10	57	4	616	.
2001 Application Denied	0	7	6	1	62	2	8	1	87	.
2001 Denial Rate %	0.0%	38.9%	24.0%	5.6%	11.1%	16.7%	12.3%	20.0%	12.4%	.
2002 Loan Originated	1	12	26	12	586	6	20	1	664	.
2002 Application Denied	1	0	3	4	68	3	25	0	104	.
2002 Denial Rate %	50.0%	0.0%	10.3%	25.0%	10.4%	33.3%	55.6%	0.0%	13.5%	.
2003 Loan Originated	0	21	14	22	645	12	37	.	751	.
2003 Application Denied	1	4	5	2	64	1	5	.	82	.
2003 Denial Rate %	100.0%	16.0%	26.3%	8.3%	9.0%	7.7%	11.9%	.	9.8%	.
2004 Loan Originated	0	17	23	.	671	.	37	5	753	21
2004 Application Denied	1	4	10	.	74	.	15	5	109	6
2004 Denial Rate %	100.0%	19.0%	30.3%	.	9.9%	.	28.8%	50.0%	12.6%	22.2%
2005 Loan Originated	1	24	28	.	663	.	41	.	757	29
2005 Application Denied	0	8	5	.	94	.	18	.	125	24
2005 Denial Rate %	0.0%	25.0%	15.2%	.	12.4%	.	30.5%	.	14.2%	45.3%
2006 Loan Originated	4	20	31	.	735	.	28	.	818	32
2006 Application Denied	2	5	9	.	125	.	15	.	156	24
2006 Denial Rate %	33.3%	20.0%	22.5%	.	14.5%	.	34.9%	.	16.0%	42.9%
Total Loan Originated	8	105	141	51	3,796	28	220	10	4,359	82
Total Application Denied	5	28	38	7	487	6	86	6	663	54
Total Denial Rate %	38.5%	21.1%	21.2%	12.1%	11.4%	17.6%	28.1%	37.5%	13.2%	39.7%

Table B.5
Sub-Prime Lender Owner Occupied Home Purchase Loan Applications:
Originated and Denied
Rome and Utica Cities
HMDA Data 2001-2006

Action Taken	American Indian or Alaskan Native	Asian or Pacific Islander	Black	Hispanic (Race)	White	Other	Not Provided by Applicant	Total	Hispanic (Ethnicity)
2001 Loan Originated	.	.	2	0	11	0	1	14	.
2001 Application Denied	.	.	4	2	17	1	15	39	.
2001 Denial Rate %	.	.	66.7%	100.0%	60.7%	100.0%	93.8%	73.6%	.
2002 Loan Originated	.	.	0	.	11	.	5	16	.
2002 Application Denied	.	.	1	.	7	.	10	18	.
2002 Denial Rate %	.	.	100.0%	.	38.9%	.	66.7%	52.9%	.
2003 Loan Originated	.	0	1	1	15	.	6	23	.
2003 Application Denied	.	1	0	2	9	.	9	21	.
2003 Denial Rate %	.	100.0%	0.0%	66.7%	37.5%	.	60.0%	47.7%	.
2004 Loan Originated	0	.	3	.	26	.	4	33	0
2004 Application Denied	1	.	2	.	26	.	7	36	1
2004 Denial Rate %	100.0%	.	40.0%	.	50.0%	.	63.6%	52.2%	100.0%
2005 Loan Originated	.	.	1	.	37	.	4	42	1
2005 Application Denied	.	.	0	.	27	.	10	37	1
2005 Denial Rate %	.	.	0.0%	.	42.2%	.	71.4%	46.8%	50.0%
2006 Loan Originated	.	1	1	.	32	.	6	40	4
2006 Application Denied	.	1	4	.	41	.	10	56	9
2006 Denial Rate %	.	50.0%	80.0%	.	56.2%	.	62.5%	58.3%	69.2%
Total Loan Originated	0	1	8	1	132	0	26	168	5
Total Application Denied	1	2	11	4	127	1	61	207	11
Total Denial Rate %	100.0%	66.7%	57.9%	80.0%	49.0%	100.0%	70.1%	55.2%	16

Table B.6
Mobile Home Lender Owner Occupied Home Purchase Loan Applications:
Originated and Denied
Rome and Utica Cities
HMDA Data 2001-2003

Action Taken	Black	Hispanic (Race)	White	Not Provided by Applicant	Total
2001 Loan Originated	0	.	3	7	10
2001 Application Denied	2	.	14	14	30
2001 Denial Rate %	100.0%	.	82.4%	66.7%	75.0%
2002 Loan Originated	.	0	2	0	2
2002 Application Denied	.	1	12	4	17
2002 Denial Rate %	.	100.0%	85.7%	100.0%	89.5%
2003 Loan Originated	.	.	7	0	7
2003 Application Denied	.	.	15	1	16
2003 Denial Rate %	.	.	68.2%	100.0%	69.6%
Total Loan Originated	0	0	12	7	19
Total Application Denied	2	1	41	19	63
Total Denial Rate %	100.0%	100.0%	77.4%	73.1%	76.8%

Table B.7
Prime Lender Owner Occupied Home Purchase Loan Applications:
Originated and Denied
Rome and Utica Cities
HMDA Data 2001 - 2006

Action Taken	Male	Female	Not Provided by Applicant	Not Applicable	Total
2001 Loan Originated	400	161	54	1	616
2001 Application Denied	49	32	6	0	87
2001 Denial Rate %	10.9%	16.6%	10.0%	0.0%	12.4%
2002 Loan Originated	452	197	15	.	664
2002 Application Denied	54	27	23	.	104
2002 Denial Rate %	10.7%	12.1%	60.5%	.	13.5%
2003 Loan Originated	495	237	19	.	751
2003 Application Denied	47	28	7	.	82
2003 Denial Rate %	8.7%	10.6%	26.9%	.	9.8%
2004 Loan Originated	460	275	18	.	753
2004 Application Denied	55	43	7	.	105
2004 Denial Rate %	10.7%	13.5%	28.0%	.	12.2%
2005 Loan Originated	501	233	23	.	757
2005 Application Denied	82	34	9	.	125
2005 Denial Rate %	14.1%	12.7%	28.1%	.	14.2%
2006 Loan Originated	524	284	10	.	818
2006 Application Denied	99	46	11	.	156
2006 Denial Rate %	15.9%	13.9%	52.4%	.	16.0%
Total Loan Originated	2,832	1,387	139	1	4,359
Total Application Denied	386	210	63	0	659
Total Denial Rate %	12.0%	13.1%	31.2%	0.0%	13.1%

Table B.8
Sub-Prime Lender Owner Occupied Home Purchase Loan
Applications: Originated and Denied
Rome and Utica Cities
HMDA Data 2001 - 2006

Action Taken	Male	Female	Not Provided by Applicant	Total
2001 Loan Originated	4	9	1	14
2001 Application Denied	15	12	12	39
2001 Denial Rate %	78.9%	57.1%	92.3%	73.6%
2002 Loan Originated	7	7	2	16
2002 Application Denied	7	6	5	18
2002 Denial Rate %	50.0%	46.2%	71.4%	52.9%
2003 Loan Originated	11	11	1	23
2003 Application Denied	10	6	5	21
2003 Denial Rate %	47.6%	35.3%	83.3%	47.7%
2004 Loan Originated	17	14	2	33
2004 Application Denied	16	19	1	36
2004 Denial Rate %	48.5%	57.6%	33.3%	52.2%
2005 Loan Originated	29	12	1	42
2005 Application Denied	25	11	1	37
2005 Denial Rate %	46.3%	47.8%	50.0%	46.8%
2006 Loan Originated	19	17	4	40
2006 Application Denied	32	19	5	56
2006 Denial Rate %	62.7%	52.8%	55.6%	58.3%
Total Loan Originated	87	70	11	168
Total Application Denied	105	73	29	207
Total Denial Rate %	54.7%	51.0%	72.5%	55.2%

Table B.9
Mobile Home Lender Owner Occupied Home Purchase Loan
Applications: Originated and Denied
Rome and Utica Cities
HMDA Data 2001 - 2006

Action Taken	Male	Female	Not Provided by Applicant	Total
2001 Loan Originated	3	1	6	10
2001 Application Denied	10	7	13	30
2001 Total	13	8	19	40
2002 Loan Originated	2	0	0	2
2002 Application Denied	7	7	3	17
2002 Total	9	7	3	19
2003 Loan Originated	5	2	.	7
2003 Application Denied	7	9	.	16
2003 Total	12	11	.	23
Total Loan Originated	10	3	6	19
Total Application Denied	24	23	16	63
Total	34	26	22	82

Table B.10
Action of Owner Occupied Home Purchase Loan Applications by Income by Race:
Originated and Denied
Rome and Utica Cities
HMDA Data 2001-2006

Race		<= \$15K	\$15K - \$30K	\$30K - \$45K	\$45K - \$60K	\$60K - \$75K	> \$75K	Data Missing	Total
American Indian or Alaskan Native	Loan Originated	.	1	4	2	0	1	.	8
	Application Denied	.	0	2	3	1	0	.	6
	Denial Rate %	.	0.0%	33.3%	60.0%	100.0%	0.0%	.	42.9%
Asian or Pacific Islander	Loan Originated	.	51	33	8	3	8	3	106
	Application Denied	.	6	8	8	2	2	4	30
	Denial Rate %	.	10.5%	19.5%	50.0%	40.0%	20.0%	57.1%	22.1%
Black	Loan Originated	6	56	34	31	8	12	2	149
	Application Denied	5	15	12	9	7	2	1	51
	Denial Rate %	45.5%	21.1%	26.1%	22.5%	46.7%	14.3%	33.3%	25.5%
Hispanic (Race)	Loan Originated	1	18	16	10	1	1	5	52
	Application Denied	2	4	3	2	0	1	0	12
	Denial Rate %	66.7%	18.2%	15.8%	16.7%	0.0%	50.0%	0.0%	18.8%
White	Loan Originated	55	1,030	1,251	713	372	439	80	3,940
	Application Denied	31	210	172	124	47	48	23	655
	Denial Rate %	36.0%	16.9%	12.1%	14.8%	11.2%	9.9%	22.3%	14.3%
Other	Loan Originated	4	12	11	0	.	1	0	28
	Application Denied	0	3	2	1	.	0	1	7
	Denial Rate %	0.0%	20.0%	15.4%	100.0%	.	0.0%	100.0%	20.0%
Not Provided by Applicant	Loan Originated	5	76	60	56	27	22	7	253
	Application Denied	9	58	37	28	8	13	13	166
	Denial Rate %	64.3%	43.3%	38.1%	33.3%	22.9%	37.1%	65.0%	39.6%
Not Applicable	Loan Originated	0	2	3	1	.	.	4	10
	Application Denied	1	0	0	1	.	.	4	6
	Denial Rate %	100.0%	0.0%	0.0%	50.0%	.	.	50.0%	37.5%
Total	Loan Originated	71	1,246	1,412	821	411	484	101	4,546
	Application Denied	48	296	236	176	65	66	46	933
	Denial Rate %	40.3%	19.2%	14.3%	17.7%	13.7%	12.0%	31.3%	17.0%
Hispanic (Ethnic)	Loan Originated	1	26	32	10	4	6	8	87
	Application Denied	3	25	18	6	6	5	2	65
	Denial Rate %	75.0%	49.0%	36.0%	37.5%	60.0%	45.5%	20.0%	42.8%

Table B.11
Originated Owner-Occupied Home Purchase Loans by
Predatory Status
Rome and Utica Cities
HMDA Data 2004 - 2006

Loan Type	2004	2005	2006	Total
Other Originated	864	855	931	2,650
High APR Loan	67	106	139	312
Total	931	961	1,070	2,962
Percent High APR	7.2%	11.0%	13.0%	10.5%

Table B.12
Originated Owner-Occupied Home Purchase Loans by Race by Predatory
Loan Status
Rome and Utica Cities
HMDA Data 2004 - 2006

Race	Loan Type	2004	2005	2006	Total
American Indian	Other Originated	.	1	4	5
	High APR Loan	.	0	0	0
	Percent High APR	.	0.0%	0.0%	0.0%
Asian	Other Originated	13	23	16	52
	High APR Loan	4	1	5	10
	Percent High APR	23.5%	4.2%	23.8%	16.1%
Black or African American	Other Originated	21	24	25	70
	High APR Loan	5	5	7	17
	Percent High APR	19.2%	17.2%	21.9%	19.5%
White	Other Originated	647	624	661	1,932
	High APR Loan	50	76	106	232
	Percent High APR	7.2%	10.9%	13.8%	10.7%
Not Provided by Applicant	Other Originated	34	21	13	68
	High APR Loan	7	24	21	52
	Percent High APR	17.1%	53.3%	61.8%	43.3%
Not Applicable	Other Originated	4	.	.	4
	High APR Loan	1	.	.	1
	Percent High APR	20.0%	.	.	20.0%

Table B.13
Originated Owner-Occupied Home Purchase Loans by Gender by
Predatory Loan Status
Rome and Utica Cities
HMDA Data 2004 - 2006

Gender	Loan Type	2004	2005	2006	Total
Male	Other Originated	440	465	471	1376
	High APR Loan	37	65	72	174
	Percent High APR	7.8%	12.3%	13.3%	11.2%
Female	Other Originated	261	214	243	718
	High APR Loan	28	31	58	117
	Percent High APR	9.7%	12.7%	19.3%	14.0%
Not Provided by Applicant	Other Originated	18	14	5	37
	High APR Loan	2	10	9	21
	Percent High APR	10.0%	41.7%	64.3%	36.2%

Table B.14
Originated Owner-Occupied Home Purchase Loans by Ethnicity
by Predatory Loan Status
Rome and Utica Cities
HMDA Data 2004 - 2006

Ethnicity	Loan Type	2004	2005	2006	Total
Hispanic or Latino	Other Originated	18	21	26	65
	High APR Loan	3	9	10	22
	Percent High APR	14.3%	30.0%	27.8%	25.3%
Not Hispanic or Latino	Other Originated	530	647	682	1859
	High APR Loan	50	77	109	236
	Percent High APR	8.6%	10.6%	13.8%	11.3%
Not Provided by Applicant	Other Originated	84	25	11	120
	High APR Loan	7	20	20	47
	Percent High APR	7.7%	44.4%	64.5%	28.1%
Not Applicable	Other Originated	87	.	.	87
	High APR Loan	7	.	.	7
	Percent High APR	7.4%	.	.	7.4%

Appendix B.15
Minority Denial Rate by Census Tract
HMDA Data 2001 - 2006

City	Census Tract	Action Taken		Total	Percent Denial Rate
		Originated	Denied		
Utica	201	1	1	2	50.00
Utica	203	1	3	4	75.00
Utica	207.01	18	1	19	5.26
Utica	207.02	29	6	35	17.14
Utica	208.02	8	3	11	27.27
Utica	208.03	3	2	5	40.00
Utica	209	2	3	5	60.00
Utica	210	3	2	5	40.00
Utica	211.01	0	2	2	100.00
Utica	211.02	14	7	21	33.33
Utica	211.03	8	0	8	0.00
Utica	212.01	7	4	11	36.36
Utica	212.02	29	12	41	29.27
Utica	213.01	5	1	6	16.67
Utica	213.02	4	6	10	60.00
Utica	213.03	8	1	9	11.11
Utica	214.01	14	1	15	6.67
Utica	214.02	13	3	16	18.75
Utica	214.04	1	0	1	0.00
Utica	215	6	2	8	25.00
Utica	216.01	15	1	16	6.25
Utica	216.02	4	2	6	33.33
Utica	217.01	6	2	8	25.00
Utica	217.02	10	3	13	23.08
Rome	218
Rome	219	2	1	3	33.33
Rome	220	3	1	4	25.00
Rome	221	5	0	5	0.00
Rome	222	6	6	12	50.00
Rome	223	7	3	10	30.00
Rome	224	12	6	18	33.33
Rome	225	3	0	3	0.00
Rome	226	1	0	1	0.00
Rome	227.01	2	1	3	33.33
Rome	227.02	13	1	14	7.14
Rome	228
Rome	229

Appendix B.16
Ethnicity Denial Rate by Census Tract
HMDA Data 2001 - 2006

City	Census Tract	Action Taken		Total	Percent Denial Rate
		Originated	Denied		
Utica	201	0	1	1	100.00
Utica	203	0	1	1	100.00
Utica	207.01	6	3	9	33.33
Utica	207.02	17	8	25	32.00
Utica	208.02	11	5	16	31.25
Utica	208.03	11	5	16	31.25
Utica	209	2	3	5	60.00
Utica	210	1	1	2	50.00
Utica	211.01	2	1	3	33.33
Utica	211.02	3	6	9	66.67
Utica	211.03	2	1	3	33.33
Utica	212.01	3	5	8	62.50
Utica	212.02	9	5	14	35.71
Utica	213.01
Utica	213.02	8	7	15	46.67
Utica	213.03	7	3	10	30.00
Utica	214.01	2	3	5	60.00
Utica	214.02	3	2	5	40.00
Utica	214.04
Utica	215	5	7	12	58.33
Utica	216.01	13	1	14	7.14
Utica	216.02	4	0	4	0.00
Utica	217.01	3	0	3	0.00
Utica	217.02	7	0	7	0.00
Rome	218
Rome	219	0	1	1	100.00
Rome	220	3	1	4	25.00
Rome	221	1	0	1	0.00
Rome	222	1	0	1	0.00
Rome	223	4	3	7	42.86
Rome	224	3	0	3	0.00
Rome	225	1	1	2	50.00
Rome	226
Rome	227.01	2	0	2	0.00
Rome	227.02	2	3	5	60.00
Rome	228	3	0	3	0.00
Rome	229

Appendix B.17
High Annual Percentage Rate Loans by Census Tract
HMDA Data 2001 - 2006

City	Census Tract	Loan Type		Total	Percent Denial Rate
		Regular	HALs		
Utica	201	7	2	9	22.2%
Utica	203	8	0	8	0.0%
Utica	207.01	27	5	32	15.6%
Utica	207.02	142	25	167	15.0%
Utica	208.02	99	8	107	7.5%
Utica	208.03	39	5	44	11.4%
Utica	209	21	1	22	4.5%
Utica	210	12	0	12	0.0%
Utica	211.01	7	2	9	22.2%
Utica	211.02	36	7	43	16.3%
Utica	211.03	53	3	56	5.4%
Utica	212.01	33	3	36	8.3%
Utica	212.02	65	12	77	15.6%
Utica	213.01	63	6	69	8.7%
Utica	213.02	111	11	122	9.0%
Utica	213.03	114	9	123	7.3%
Utica	214.01	70	3	73	4.1%
Utica	214.02	55	9	64	14.1%
Utica	214.04	0	0	0	0.0%
Utica	215	28	4	32	12.5%
Utica	216.01	212	23	235	9.8%
Utica	216.02	123	11	134	8.2%
Utica	217.01	155	10	165	6.1%
Utica	217.02	120	23	143	16.1%
Utica	218	13	2	15	13.3%
Utica	219	37	7	44	15.9%
Utica	220	89	17	106	16.0%
Rome	221	132	14	146	9.6%
Rome	222	135	10	145	6.9%
Rome	223	65	14	79	17.7%
Rome	224	170	16	186	8.6%
Rome	225	64	8	72	11.1%
Rome	226	1	0	1	0.0%
Rome	227.01	74	6	80	7.5%
Rome	227.02	176	23	199	11.6%
Rome	228	93	11	104	10.6%
Rome	229	1	2	3	66.7%

APPENDIX C. 2008 FAIR HOUSING SURVEY DATA

Table C.1
Role of Respondents in the Housing Market
 2008 Rome/Utica Fair Housing Survey

Role in Housing Market	
Architect	Housing and Homeless Coalition
Broker/Owner	In Need Housing Provider
Building Inspector	In Need Service Provider
Chief Planner	In Need Service Provider/Homeless Assistance
City Assessor	In Need Service Provider/Realtor
Code Commissioner for City of Utica	Loan Officer
Commercial Architect	Manage Housing Development Programs
Commissioner of Public Safety	Mortgage Consultant
Community Activist	Mortgage Loan Officer
Community Developer	Mortgage Operations Manager
Community Development	Mortgage Originator
Community Development Coordinator	Non-profit Community Development Administrator
Community Manager	Occupancy Specialist
Community Reinvestment Officer	Pastor
Community and Economic Development Dir Rome	Planning Director
Director of Transitional Housing	President NAACP Rome branch
Elected Official	President of Latino Assn
Exec Dir Municipal Housing Authority of Utica	Public Safety Coordinator
Executive Director	Real Estate Broker
Executive Director FH Council for Central NY	Real Estate Broker/Property Management
Executive Director of Local Public Housing Rome	Real Estate Sales
Executive Officer Board of Realtors	Realtor
Home Builder	Senior Social Welfare Examiner
Homeless Assistance	Special Needs Housing Provider
Housing Code Inspector	Tenant Advocate
Housing Developer	VP of Residential Mortgage Originations/ Marketing
Housing Director	

Table C.2
What Groups Are Protected by Fair Housing Laws?
2008 Rome/Utica Fair Housing Survey

Group	Number of Responses	Group	Number of Responses
Everyone	30	Widows	2
Disabled	21	All Income Levels	1
Low Income	21	Blacks	1
Minorities	13	Consumers	1
Race	12	Conviction Record	1
Gender	10	Economic Condition	1
Religion	9	First time home buyers	1
Color	6	Hispanics	1
Ethnicity	6	HIV or AIDS Positive	1
Marital Status	6	Homeless	1
Age	5	Landlords	1
Familial Status	5	Less Educated People	1
Don't Know	4	Less Fortunate People	1
Elderly	4	Low Education	1
Low and Middle income	3	Middle and Upper Classes	1
Renters	3	Nationality	1
Sexual Orientation	3	People in treatment centers	1
All Groups	2	People receiving county services	1
Anyone	2	Refugees	1
Creed	2	Section 8	1
Criminal Record	2	Prospective Homeowners	1
Immigrants	2	White People	1
Military	2	Women	1
National Origin	2		

Table C.3
Where Would You Refer Someone Who Has Been a Victim of Housing Discrimination?
2008 Rome/Utica Fair Housing Survey

Agency/Organization	Responses	Agency/Organization	Responses
HUD	16	Google Website	1
Legal Aid	7	Housing Authority	1
Attorney Generals Office	4	I'd call the Board of Realtors to find out	1
Dept of State	4	I'd email HUD for them	1
Attorney	3	I'd look in the telephone book	1
City Hall	3	Lawyer	1
Don't Know	3	Legal Aid Society in Utica	1
Attorney General	2	Legal Dept of City Government	1
Codes Department	2	Mohawk Valley Community Action	1
I'd have to do some research	2	Mortgage origination dept of lending bank	1
Local Board of Realtors	2	Municipal Housing Authority	1
Mayor's Office	2	Neighborhood Housing Services of Utica	1
NY State Attorney General's Office	2	Neighborhood Works	1
The Housing Authority	2	New York State Fair Housing	1
Wants to be the judge	2	New York state government	1
A City Agency	1	NY state banking dept	1
Assembly Woman in State Office	1	Our Community Resource People	1
Attorney General NY State	1	Planning Director of Community Development Utica	1
Attorney General State of New York	1	Private Counsel	1
Better Business Bureau	1	Rome Housing Authority	1
Board of Realtors	1	State Realtor Association	1
Central NY FH Council	1	State Senator	1
City Level of Housing Authority	1	Superior Office at the Bank	1
Community Action	1	Their Counselor	1
Congressman's Office	1	Their local politician	1
Division of Housing for New York State	1	Urban Economic Development	1
Fair Housing Authority	1	Utica Housing Authority	1
Fair Housing Board	1		
Fair Housing Council New York	1		

Table C.4
2008 Rome/Utica Fair Housing Survey

IF, YES, What are the Causes of Your Concern?

For the Utica/Rome Region

Absentee landlords with no way to get education on fair housing

Agencies dictate the condition the property must be in before their client moves in; then when the client damages the place they don't want to hear about it

Certain ethnic groups are perceived as not having the money to maintain property or ability to keep things positive with the people living in their vicinity

Cost of housing; e.g.; Trying to rent a room is very difficult for those on financial assistance just coming out of a shelter

Discriminatory terms and conditions

Housing unaffordable because of landlords wanting rent and security deposits upfront

HUD says they didn't receive paperwork when I know they did

I don't think the public knows enough about their rights

Inadequate accommodation for disabled access to buildings

Inner workings of low income housing rental properties

Lack of access to public housing based on violating fair housing regulations in both cities

Lack of expertise to implement those dollars at the city level

Large homeless population

Make sure there is enough affordable housing

Mortgage and lending need to be addressed

Most rural areas of any state tend to be prejudiced

Need more education on the laws

Not enough info in the community on fair housing and laws to protect them

People feel alienated by a generally bigoted society

People feel their complaints about discrimination are unheard

People of color and low income people will not have access to opportunities for good housing

People say they are not being treated fairly by HUD

Possible discrimination towards the immigrant and refugee population

Some agencies are not properly and equally serving all the people

Steering to push Blacks and Hispanics into the inner city

The economy in both cities is struggling

The way dollars are allocated to different neighborhoods

There are issues with Hispanics and Blacks

There is not enough word getting out to organizations that there is training available on fair housing

There should be a local testing program to document specific cases of fair housing discrimination

We need a better understanding of existing housing conditions and how to improve it for both cities

For Rome City

All fair housing is not taxed according to fair market value

Has a lot of foreclosures I think

Local and state governments need to protect people who are trying to administer the fair housing law

Table C.4 Cont.
2008 Rome/Utica Fair Housing Survey

IF, YES, What are the Causes of Your Concern?

For Utica City

Nimbyism

Blacks are not provided with enough access and opportunities to live where they want to live

City housing authority application process prohibits people from meeting the housing requirements

City HUD branch works more against people than for them

Fraudulent applications for fair housing opportunities

Getting info to people without access to computers; need more info through newspapers and mail

Has a large black population; Cornhill area has a high degree of Blacks & disinvestment in that area

I don't see many minorities purchasing Hope 6 homes; I think it's because of credit problems

Inability to monitor fraudulent applications

Lack of enforcement of fair housing

Lack of knowledge about fair housing particularly by landlords

There are no ramps in housing for the handicapped

There is no education out there to help people clear up their credit history

We have a large influx of Bosnian and Russian refugees causing constant language barriers

Table C.5
2008 Rome/Utica Fair Housing Survey

IF, YES, What Do You See as the Primary Barriers to Affirmatively Furthering Fair Housing?

Utica/Rome Region

City Government not effectively communicating with non English speaking people
 City is not consulting with community groups
 Different agencies seem upset when a person needs a translator
 Language barrier
 Language barriers involving several languages
 Municipalities not aware of their obligations and are not enforcing Fair Housing laws
 No Fair Housing workshops or commercials
 Not being able to meet new minimum credit score requirements
 Poverty and ignorance of tenants
 Supply of housing is low
 The banking industry doesn't have enough innovative programs to help poor people
 The law is reactive rather than proactive making the process to prove discrimination a very long drawn out process
 We've lost a large portion of single room occupancy for disabled

Rome

Housing inventory is aged; no new construction in a long time
 Lack of education about credit
 Lack of education of the people in Rome regarding the fair housing act
 Very few people take advantage of housing seminars

Utica

Bigotry
 City doesn't listen to input from public
 Contractors only take jobs in Cornhill when nothing else to do because of theft and vandalism at jobsites
 Fair Housing not a high priority
 Income level and credit histories of the people
 Lack of education
 Lack of education
 Lack of fair housing information for the public
 Lack of funding
 Lack of jobs
 Lack of publicity of the education about fair housing to help consumers
 Landlords might not be aware of fair housing requirements
 Limited opportunities for people of color in the workplace
 Our entitlement continues to shrink annually
 Perception that if you are not receiving a government subsidy that you have no requirement to follow the law
 Pressure on landlords from city codes dept about nuisance activity
 The discriminatory attitude of the neighbors
 The economy
 There is strain between ethnic groups; they don't want to sell to each other

Table C.6
Geographic Areas with Perceived Fair Housing Problems
2008 Rome/Utica Fair Housing Survey

Geographic Area	Number of Responses
Cornhill area in Utica	8
North and South Utica	2
Whitesboro and New Hartford	1
West Utica and Cornhill area	1
Utica-No specifics	1
Suburbs of Utica and rural areas of Utica and Rome	1
South Utica	1
South and West Rome	1
Outskirts of both Rome and Utica	1
No specifics	1
New Hartford in Utica area and Whitesboro	1
Inner city Utica and South Rome	1
Inner city of Utica	1
Inner city of Rome	1
East Utica around Mohawk Street	1
East and West Utica and the Cornhill area	1
East and West Utica and no specific area of Rome	1
East and West Utica	1
East and South Rome; Cornhill area in Utica	1
E & W Utica and central areas of Utica and Rome	1
Downtown Utica and Rome	1
Cornhill area in Utica and downtown Rome	1
Total	30

Table C.7
2008 Rome/Utica Fair Housing Survey

IF, YES, Which Policy and Unit of Government
Utica/Rome Region
All three governments lack information about fair housing problems and needs of the citizens
County and city have taken no action to promote development of fair housing in suburbs and rural areas
Municipal housing authorities haven't done enough to make it possible to get into municipal housing
Politics in all three levels of government adversely affect fair housing
School property taxes created by city government make housing unaffordable
Tax and energy costs are too high; too many attorneys involved; too long to close houses
The State's interpretation of the Section 8 program

Utica

All three governments; o specifics
City government steering towards the areas where the worst poverty exists
County and City government are not enforcing code violations
Inefficiencies and lack of coordination among agencies
Municipal housing; instead of trying to do a mixed income neighborhood they put all low cost housing in one area
Municipal housing authority requiring a police report for all applying for municipal housing
State government; no specifics

Table C.8

2008 Rome/Utica Fair Housing Survey

If, Yes, What Was The Non-Compliance Issue?

Housing condition problems

In Rome read in paper about a class action suit against an apt complex for terminating leases so it could renovate

In Utica access to HOPE 6 housing projects is almost non-existent by Blacks; Credit checks of Blacks is one barrier

In Utica the Utica Housing Authority has violated the Fair Housing Act; Discriminated against someone with a disability

Utica was awarded a huge grant for a program that came under intense scrutiny; no specifics

Table C.9

2008 Rome/Utica Fair Housing Survey

IF, YES, Which Codes or Regulations Represent Barriers to Fair Housing Choice

Utica/Rome Region

City permitting problems

Historic preservation is very costly

In both cities code enforcement not strict enough on older buildings

More inclusionary zoning laws

Municipal housing

Rome

The barrier might be the City Council

Utica

Accessibility requirements are sometimes difficult and expensive

Building code requirements regarding fire escapes and exits

Expense of Lead paint and soil requirements

Housing Authority building new homes which violate fire codes

Table C.10
Fair Housing Complaints Filed with HUD in the Cities of Rome and Utica
 Basis of Complaint: Fiscal 2000-2006

Year	Race	Disability	Color	Gender	National Origin	Familial Status	Total Basis	Total Complaints
Rome								
2000	.	1	.	.	.	1	2	1
2001	1	1	1
2002
2003	2	2	2
2004	.	1	.	.	1	.	2	2
2005	1	3	.	1	.	1	6	3
2006
Total	1	5	0	1	1	5	13	9
Utica								
2000
2001	1	1	1	.	1	.	4	2
2002
2003	3	.	.	1	.	.	4	3
2004	.	1	.	1	1	1	4	1
2005
2006	1	1	.	1	.	.	3	1
Total	5	3	1	3	2	1	15	7
Total								
2000	.	1	.	.	.	1	2	1
2001	1	1	1	.	1	1	5	3
2002
2003	3	.	.	1	.	2	6	5
2004	.	2	.	1	2	1	6	3
2005	1	3	.	1	.	1	6	3
2006	1	1	.	1	.	0	3	1
Total	6	8	1	4	3	6	28	16

