# Cities of Rome and Utica

2020 Analysis of Impediment to Fair Housing Choice

# Has Your Right to Fair Housing Been Violated?

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

### New York Division of Human Rights

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

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# **2020** CITIES OF ROME AND UTICA ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE



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# Section I. Executive Summary

#### Overview

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

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

#### Assessing Fair Housing

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

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

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

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

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

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

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

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

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

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

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

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

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

#### **Overview of Findings**

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

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

1. High: Factors that have a direct and substantial impact on fair housing choice.

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

- 2. Medium: Factors that have a less direct impact on fair housing choice, or that the Cities have limited authority to mandate change.
- 3. Low: Factors that have a slight or largely indirect impact on fair housing choice, or that the Cities have limited capacity to address.

Table I.1						
Contributing Factors						
	Rome and	d Utica				
Contributing Factors	Priority	Justification				
Moderate to high levels of segregation	High	In 2017, black and Asian households had a moderate to high level of segregation in Utica, according to the Dissimilarity Index. This level of segregation has grown since 2010. In Rome, Asian and Native American households had moderate to high levels of segregation, however, these households represent a very small proportion of the population.				
Inequitable access to proficient schools and labor market engagement	Med	Black and Asian households in Rome have less access to proficient schools and labor market engagement, as indicated by the Access to Opportunity index. Black, Hispanic, and Asian households in Utica have less access to proficient schools and labor market engagement; However, the Cities have little control over impacting labor market engagement on a large scale.				
Insufficient affordable housing in a range of unit sizes	High	Some 30.5 percent of households in Rome, and 39.3 percent of households in Utica have cost burdens. This is more significant for renter households, of which 44.1 percent of households in Rome and 55.2 percent in Utica have cost burdens. This signifies a lack of housing options that are affordable to a large proportion of the population.				
Insufficient accessible affordable housing	High	An estimated 16.2 and 17.8 percent of persons in Rome and Utica, respectively, have a disability. For those aged 75 and older, this rate increases to 45.7 and 55.6 percent. The need for accessible housing will increase as the population continues to age.				
Discriminatory patterns in Lending	Med	The mortgage denial rates for black and Hispanic households are higher than the jurisdiction average according to 2008-2018 HMDA data.				
Insufficient accessible affordable housing	High	The number of accessible affordable units may not meet the need of the growing elderly and disabled population, particularly as the population continues to age. Some 55.8 percent of persons aged 75 and older have at least one form of disability.				
Lack of fair housing infrastructure	High	The fair housing survey and public input indicated a lack of collaboration among agencies to support fair housing.				
Insufficient fair housing education	High	The fair housing survey and public input indicated a lack of knowledge about fair housing and a need for education.				
Insufficient understanding of credit	High	The fair housing survey and public input indicated an insufficient understanding of credit needed to access mortgages.				

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

Table 1.2 summarizes the fair housing issues/impediments and contributing factors, including metrics, milestones, and a timeframe for achievements.

Fair Housing Goal	Impediments to Fair Housing Choice/ Contributing Factors	Recommended Actions
Promote affordable homeow nership and rental opportunities in areas with lower poverty	Moderate to high levels of segregation Inequitable access to proficient schools and labor market engagement Insufficient affordable housing in a range of unit sizes Discriminatory patterns in Lending	Continue to promote homeownership and affordable rental opportunities in high opportunity areas with the use of CDBG and HOME funds. Over the next five (5) years: <b>Rome:</b> Assist 5 households with homeowner rehabilitation, down payment assistance or credit counseling <b>Utica:</b> 100 Rental units constructed 100 Rental units rehabilitated 25 Homeowner Housing Added 50 Homeowner Housing Rehabilitated
Promote Community Development activities in areas with higher rates of poverty	Moderate to high levels of segregation Inequitable access to proficient schools and labor market engagement	Continue to promote economic development, public facilities, and infrastructure improvements with CDBG funds in low to moderate income neighborhoods or to benefit LMI households. Over the next five (5) years: <b>Rome:</b> Benefit 5,000 households with improved access to infrastructure and public facilities Assist 2 businesses with economic development activities Continue to promote economic development through downtown revitalization and other methods. <sup>7</sup> <b>Utica:</b> Benefit 15,000 households with improved access to infrastructure and public facilities Assist 30 businesses with economic development activities
Promote community and service provider knowledge of ADA laws	Insufficient accessible affordable housing	Rome and Utica: Increase outreach and education for housing providers in the Cities, focusing on legal requirements concerning reasonable accommodation, in coordination with local disability advocate organizations. Record activities annually.
Increase outreach and education for housing providers in the Cities	Discriminatory patterns in Lending Lack of fair housing infrastructure Insufficient fair housing education Insufficient understanding of credit	Rome and Utica: Continue to conduct fair housing outreach and education targeting rental tenants, providing an overview of fair housing laws and examples of discrimination that housing consumers may encounter in the rental housing market. Continue working with the State Attorney General and CNY Fair Housing to promote fair housing and process complaints Continue to promote education through website and online materials. Provide fair housing materials in alternative languages. Record activities annually.

<sup>&</sup>lt;sup>7</sup> The City of Rome's economic development activities includes the use of downtown revitalization grant from the State, and the Business Assistance fund, which are used to help set up or expand businesses to increase vibrancy and impact the overall economic heal th of the community. The City will continue these efforts to promote self-sufficiency and reduce the number of households with cost burdens.

# Section II. Community Participation Process

The following section describes the community participation process undertaken for the Rome and Utica Analysis of Impediments to Fair Housing Choice.

# A. OVERVIEW

The outreach process included the 2020 Fair Housing Survey, Fair Housing Forums, and a public review meeting.

The Fair Housing Survey was distributed as an internet outreach survey, as well as being made available as a printed version. As of the date of this document, 146 responses have been received.

# **B.** THE 2020 FAIR HOUSING SURVEY

The purpose of the survey, a relatively qualitative component of the AI, was to gather insight into knowledge, experiences, opinions, and feelings of stakeholders and interested citizens regarding fair housing as well as to gauge the ability of informed and interested parties to understand and affirmatively further fair housing. Many individuals and organizations throughout the Cities were invited to participate. At the date of this document, some 146 responses were received. A complete set of survey responses can be found in *Section IV.I Fair Housing Survey Results*.

# C. FAIR HOUSING FORUM

Four (4) Fair Housing Forums were held in October and November, 2020. One meeting was targeted to service providers and advocates. The second meeting targeted financial institutions and housing developers. Two additional meetings were held to allow for public comment for the residents of Rome and Utica. A summary of comments is included below. The complete transcript from this meeting will be included in the Appendix.

- Predatory lending is an issue for households
- Language barriers present an issue in accessing housing
- Employment discrimination is also an issue in the community
- The Cities should invest in historically disenfranchised persons to help level the playing field

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

A 30-day public review process was held in December, 2020. It included a public review meeting. No comments were received during this time.

# Section III. Assessment of Past Goals and Actions

An Analysis of Impediments to Fair Housing Choice for the Cities of Rome and Utica was last completed in 2008. The conclusions drawn from this report are outlined in the following narrative.

# A. PAST IMPEDIMENTS AND ACTIONS

The conclusions of the 2008 Analysis of Impediments are included below:

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 subprime 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 landlord/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

#### FAIR HOUSING ACTIVITIES

According to the City of Rome's 2019 CAPER, the City has undertaken the following efforts to further fair housing:

The City of Rome maintains a selection of fair housing information for the public from both the U.S. Department of Housing and Urban Development and the New York State Attorney General's Office. The City also routinely refers those citizens with further questions to CNY Fair Housing, a

local area non-profit with whom the City funds through its Public Service allotment, as well as the Home Ownership Center who encourages homeownership with education, financially responsible and empowered individuals, to create safe, stable and prosperous neighborhoods.

According to the City of Utica's 2018 CAPER, the City has undertaken the following efforts to further fair housing:

The City of Rome maintains a selection of fair housing information for the public from both the U.S. Department of Housing and Urban Development, and the New York State Attorney General's Office. The City also routinely refers those citizens with further questions to CNY Fair Housing, a local area non-profit with whom the City funds through its Public Services allotment.

# Section IV. Fair Housing Analysis

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

# A. SOCIO-ECONOMIC OVERVIEW

# DEMOGRAPHICS

### **Population Estimates**

Table IV.1.A, at right shows the population for Rome city. As can be seen, the population in Rome city decreased from 33,725 persons in 2010 to 32,204 persons in 2018, or by -4.5 percent.

The population in Utica city decreased from 62,235 persons in 2010 to 60,100 persons in 2018, or by -3.4 percent.

### **Census Demographic Data**

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

Table IV.1.A         Population Estimates         Rome city         Census Population Estimates					
Year	Population	Percent Yearly Change			
2000	35,019				
2001	34,663	-1.0%			
2002	34,525	-0.4%			
2003	34,425	-0.3%			
2004	34,367	-0.2%			
2005	34,206	-0.5%			
2006	34,079	-0.4%			
2007	34,019	-0.2%			
2008	33,907	-0.3%			
2009	33,776	-0.4%			
2010	33,725	-0.2%			
2011	33,537	-0.6%			
2012	32,904	-1.9%			
2013	32,780	-0.4%			
2014	32,572	-0.6%			
2015	32,393	-0.5%			
2016	32,272	-0.4%			
2017	32,289	0.1%			
2018	32,204	-0.3%			

Table IV.1.BPopulation EstimatesUtica cityCensus Population Estimates					
Year	Population	Percent Yearly Change			
2000	60,551				
2001	60,464	-0.1%			
2002	60,601	0.2%			
2003	60,830	0.4%			
2004	61,121	0.5%			
2005	61,202	0.1%			
2006	61,372	0.3%			
2007	61,612	0.4%			
2008	61,791	0.3%			
2009	62,028	0.4%			
2010	62,235	0.3%			
2011	62,030	-0.3%			
2012	61,883	-0.2%			
2013	61,683	-0.3%			
2014	61,297	-0.6%			
2015	60,911	-0.6%			
2016	60,616	-0.5%			
2017	60,402	-0.4%			
2018	60,100	-0.5%			

To study these important concepts the Census Bureau distributes the American Community Survey every year to a sample of the population and quantifies the results as one-, three- and five-year averages. The one-year sample only includes responses from the year the survey was implemented, while the five-year sample includes responses over a five-year period. Since the five-year estimates include more responses, the estimates can be tabulated down to the Census tract level, and considered more robust than the one or three year sample estimates.

#### **Population Estimates**

Population by race and ethnicity through 2018 is shown in Table IV.2.A for Rome. The white population represented 87.5 percent of the population in 2018, compared with black populations accounting for 7.0 percent of the population in 2018. Hispanic households represented 6.8 percent of the population in 2018.

Population by race and ethnicity through 2018 is shown in Table IV.2.B for Utica. The white population represented 64.4 percent of the population in 2018, compared with black populations accounting for 15.7 percent of the population in 2018. Hispanic households represented 12.2 percent of the population in 2018.

Table IV.2.B         Population by Race and Ethnicity         Rome city         2010 Census & 2018 Five-Year ACS								
Race	2010 Ce	ensus	2018 Five	-Year ACS				
Race	Population	% of Total	Population	% of Total				
White	29,483	87.4%	28,298	87.5%				
Black	2,394	7.1%	2,262	7.0%				
American Indian	115	0.3%	36	0.1%				
Asian	367	1.1%	401	1.2%				
Native Hawaiian/ Pacific Islander	1	0%	0	0%				
Other	470	1.4%	433	1.3%				
Two or More Races	Two or More Races         895         2.7%         908         2.8%							
Total	Total 33,725 100.0% 32,338 100.0%							
Non-Hispanic	Non-Hispanic 31,932 94.7% 30,153 93.2%							
Hispanic	1,793	5.3%	2,185	6.8%				

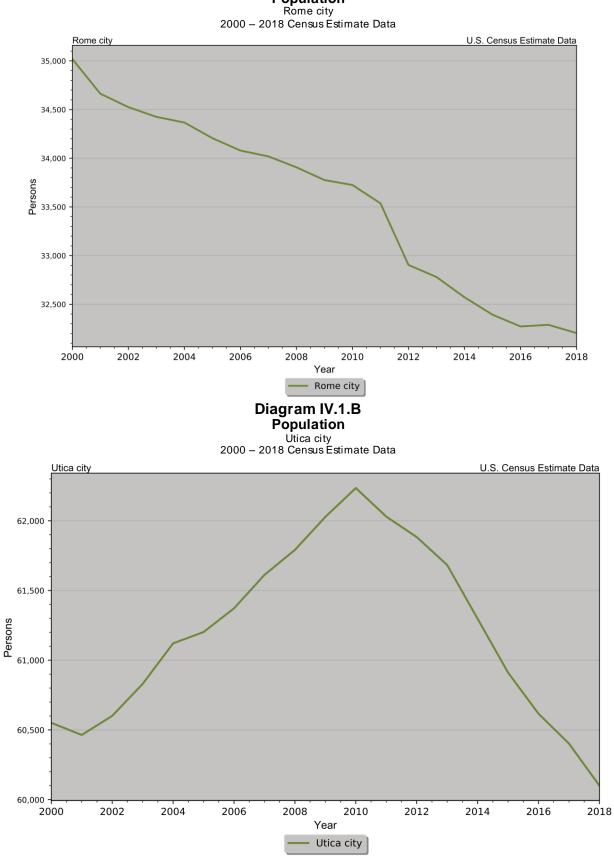




Table IV.2.BPopulation by Race and EthnicityUtica city2010 Census & 2018 Five-Year ACS								
Race	2010 Ce	ensus	2018 Five	-Year ACS				
Nace	Population	% of Total	Population	% of Total				
White	42,945	69.0%	39,084	64.4%				
Black	9,501	15.3%	9,552	15.7%				
American Indian	180	0.3%	269	0.4%				
Asian	4,626	7.4%	6,774	11.2%				
Native Hawaiian/ Pacific Islander	36	0.1%	26	0%				
Other	2,441	3.9%	2,456	4.0%				
Two or More Races	Two or More Races         2,506         4.0%         2,514         4.1%							
Total	Total 62,235 100.0% 60,675 100.0%							
Non-Hispanic 55,680 89.5% 53,249 87.8%								
Hispanic	6,555	10.5%	7,426	12.2%				

The change in race and ethnicity between 2010 and 2018 is shown in Table IV.3.A for Rome. During this time, the total non-Hispanic population was 30,153 persons in 2018. The Hispanic population was 2,185.

Table IV.3.APopulation by Race and Ethnicity Rome city2010 Census & 2018 Five-Year ACS						
Race	2010 0			e-Year ACS		
	Population	% of Total	Population	% of Total		
	Non-H	ispanic				
White	28,479	89.2%	26,931	89.3%		
Black	2,218	6.9%	2,139	7.1%		
American Indian	93	0.3%	36	0.1%		
Asian	360	1.1%	401	1.3%		
Native Hawaiian/ Pacific Islander	1	0%	0	0%		
Other	45	0.1%	27	0.1%		
Two or More Races	736	2.3%	619	2.1%		
Total Non-Hispanic	31,932	100.0%	30,153	100.0%		
	Hisp	oanic				
White	1,004	56.0%	1,367	62.6%		
Black	176	9.8%	123	5.6%		
American Indian	22	1.2%	0	0%		
Asian	7	0.4%	0	0%		
Native Hawaiian/ Pacific Islander	0	0%	0	0%		
Other	425	23.7%	406	18.6%		
Two or More Races	159	8.9%	289	13.2%		
Total Hispanic	1,793	100.0	2,185	100.0%		
Total Population	33,725	100.0%	32,338	100.0%		

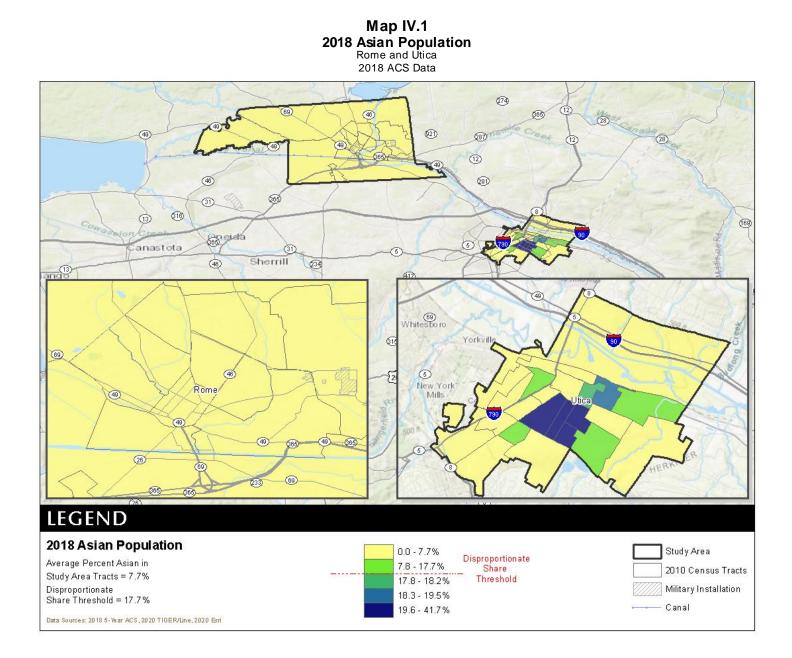
The change in race and ethnicity between 2010 and 2018 is shown in Table IV.3.B for Utica. During this time, the total non-Hispanic population was 53,249 persons in 2018. The Hispanic population was 7,426.

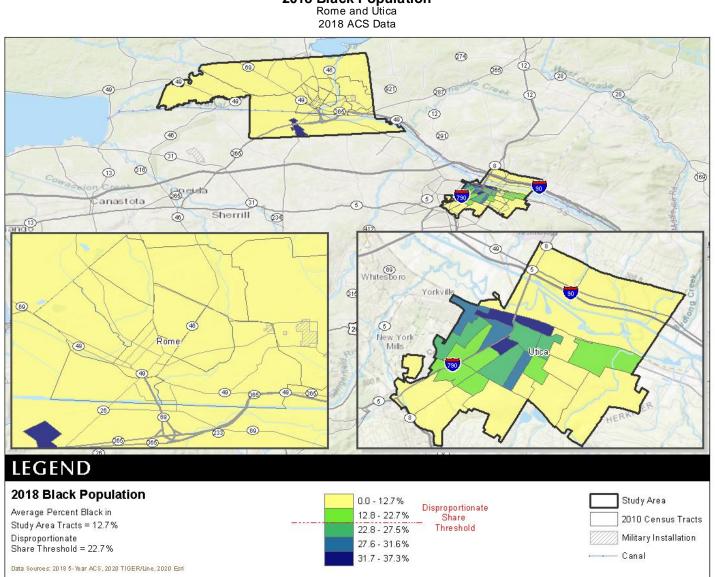
Table IV.3.BPopulation by Race and EthnicityUtica city2010 Census & 2018 Five-Year ACS						
Race	2010 0	Census	2018 Five	e-Year ACS		
Nace	Population	% of Total	Population	% of Total		
	Non-H	ispanic				
White	40,164	72.1%	35,087	65.9%		
Black	8,851	15.9%	9,232	17.3%		
American Indian	123	0.2%	214	0.4%		
Asian	4,594	8.3%	6,774	12.7%		
Native Hawaiian/ Pacific Islander	16	0%	26	0%		
Other	94	0.2%	84	0.2%		
Two or More Races	1,838	3.3%	1,832	3.4%		
Total Non-Hispanic	55,680	100.0%	53,249	100.0%		
	Hisp	oanic				
White	2,781	42.4%	3,997	53.8%		
Black	650	9.9%	320	4.3%		
American Indian	57	0.9%	55	0.7%		
Asian	32	0.5%	0	0%		
Native Hawaiian/ Pacific Islander	20	0.3%	0	0%		
Other	2,347	35.8%	2,372	31.9%		
Two or More Races	668	10.2%	682	9.2%		
Total Hispanic	6,555	100.0	7,426	100.0%		
Total Population	62,235	100.0%	60,675	100.0%		

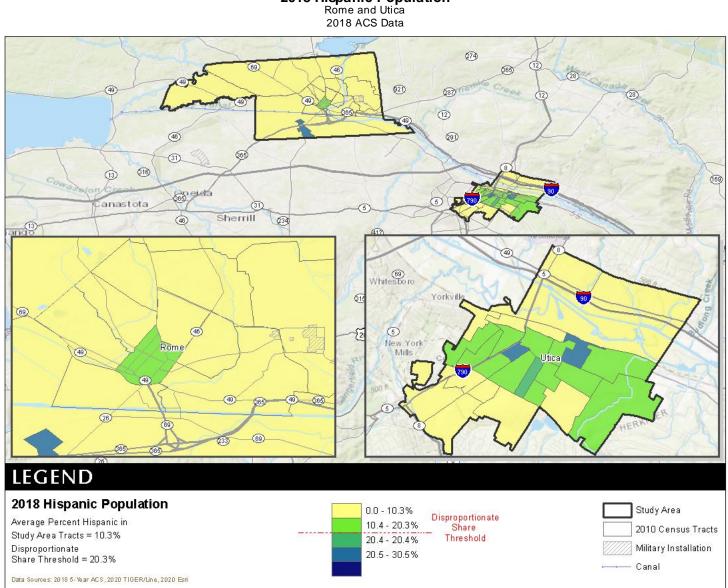
The maps on the following pages show the concentration of racial minorities in the Cities. Map IV.1 shows the concentration of the Asian population in Rome and Utica. While there are no areas of concentration of Asian households in Rome, there are concentrations of Asian households in Utica. These are seen in central Utica, and some areas exceed 19.6 percent, compared to the average of 7.7 percent in Utica.

Map IV.2 shows black households in Rome and Utica. There is one census tract in Rome with a higher concentration of black households in the southwestern part of the central city. This rate, however, may be skewed by the location of the Mohawk Correctional Facility in this census tract. In Utica, black households are concentrated in the central western part of the City.

Hispanic households are shown in Map IV.3. Both Cities have a concentration of Hispanic households in the central city.







The group quarters population was 2,882 in 2010, compared to 3,498 in 2000 in Rome. Institutionalized populations experienced a -18.1 percent change between 2000 and 2010. Non-Institutionalized populations experienced a -13.0 percent change during this same time period.

Table IV.4.A         Group Quarters Population         Rome city         2000 & 2010 Census SF1 Data					
Group Quarters Type	2000 C	ensus	2010 C	ensus	% Change
Group quarters type	Population	% of Total	Population	% of Total	00–10
	In	stitutionalized			
Correctional Institutions	2,451	77.8%	2,083	80.7%	-15.0%
Juvenile Facilities			36	1.4%	
Nursing Homes	490	15.5%	462	17.9%	-5.7%
Other Institutions	211	6.7%	0	0%	-100.0%
Total	3,152	100.0%	2,581	100.0%	-18.1%
	Non	-Institutionaliz	ed		
College Dormitories	0	0%	0	0%	0%
Military Quarters	0	0%	0	0%	0%
Other Non -Institutionalized	346	100.0%	301	100.0%	-13.0%
Total	346	100.0%	301	100.0%	-13.0%
Group Quarters Population	3,498	100.0%	2,882	100.0%	-17.6%

The group quarters population was 3,076 in 2010, compared to 3,404 in 2000 in Utica. Institutionalized populations experienced a -31.7 percent change between 2000 and 2010. Non-Institutionalized populations experienced a 12.7 percent change during this same time period.

Table IV.4.B         Group Quarters Population         Utica city         2000 & 2010 Census SF1 Data						
	2000 C	ensus	2010 C	ensus	% Change	
Group Quarters Type	Population	% of Total	Population	% of Total	00-10	
	In	stitutionalized				
Correctional Institutions	0	0%	0	0%	0%	
Juvenile Facilities			57	4.9%		
Nursing Homes	1,151	67.2%	983	83.9%	-14.6%	
OtherInstitutions	563	32.8%	131	11.2%	-76.7%	
Total	1,714	100.0%	1,171	100.0%	-31.7%	
	Non	-Institutionaliz	ed			
College Dormitories	995	58.9%	1,348	70.8%	35.5%	
Military Quarters	0	0%	0	0%	0%	
Other Non -Institutionalized	695	41.1%	557	29.2%	-19.9%	
Total	1,690	100.0%	1,905	100.0%	12.7%	
Group Quarters Population	3,404	100.0%	3,076	100.0%	-9.6%	

The number of foreign born persons is shown in Table IV.5.A in Rome. An estimated 0.3 percent of the population was born in Germany, some 0.2 percent were born in Ghana, and another 0.2 percent were born in Dominican Republic.

Table IV.5.A         Place of Birth for the Foreign-Born Population         Rome city         2018 Five-Year ACS					
Number	Country	Number of Persons	Percent of Total Population		
#1 country of origin	Germany	97	0.3%		
#2 country of origin	Ghana	77	0.2%		
#3 country of origin	Dominican Republic	61	0.2%		
#4 country of origin	China excluding Hong Kong and Taiwan	59	0.2%		
#5 country of origin	Yemen	54	0.2%		
#6 country of origin	Mexico	43	0.1%		
#7 country of origin	Italy	39	0.1%		
#8 country of origin	Ireland	38	0.1%		
#9 country of origin	Poland	38	0.1%		
#10 country of origin	U K excluding England Scotland	38	0.1%		

The number of foreign born persons is shown in Table IV.5.B for Utica. An estimated 4.0 percent of the population was born in Bosnia and Herzegovina, some 3.0 percent were born in Burma, and another 1.8 percent were born in Thailand.

Table IV.5.B         Place of Birth for the Foreign-Born Population         Utica city         2018 Five-Year ACS							
Number	Number Country Number of Persons Percent of Total Population						
#1 country of origin	Bosnia and Herzegovina	2,423	4.0%				
#2 country of origin	Burma	1,826	3.0%				
#3 country of origin	Thailand	1,110	1.8%				
#4 country of origin	Vietnam	908	1.5%				
#5 country of origin	Dominican Republic	677	1.1%				
#6 country of origin	Belarus	458	0.8%				
#7 country of origin	Iraq	273	0.4%				
#8 country of origin	Cambodia	262	0.4%				
#9 country of origin	Poland	198	0.3%				
#10 country of origin	Other South Central Asia	181	0.3%				

Limited English Proficiency and the language spoken at home are shown in Table IV.6.A for Rome. An estimated 1.4 percent of the population speaks Spanish at home, followed by 0.2 percent speaking Other Indo-European languages.

Table IV.6.ALimited English Proficiency and Language Spoken at HomeRome city2018 Five-Year ACS							
Number	Number Country Number of Persons Percent of Total Population						
#1 LEP Language	Spanish	424	1.4%				
#2 LEP Language	Other Indo-European languages	46	0.2%				
#3 LEP Language	Vietnamese	37	0.1%				
#4 LEP Language	Chinese	33	0.1%				
#5 LEP Language	Arabic	27	0.1%				
#6 LEP Language	Russian, Polish, or other Slavic languages	27	0.1%				
#7 LEP Language	Other and unspecified languages	25	0.1%				
#8 LEP Language	Tagalog	24	0.1%				
#9 LEP Language	French, Haitian, or Cajun	16	0.1%				
#10 LEP Language	Other Asian and Pacific Island languages	15	0%				

An estimated 4.8 percent of the population in Utica speaks Other Asian and Pacific Island languages at home, followed by 3.7 percent speaking Russian, Polish, or other Slavic languages.

Table IV.6.BLimited English Proficiency and Language Spoken at HomeUtica city2018 Five-Year ACS				
Number	Country	Number of Persons	Percent of Total Population	
#1 LEP Language	Other Asian and Pacific Island languages	2,686	4.8%	
#2 LEP Language	Russian, Polish, or other Slavic languages	2,065	3.7%	
#3 LEP Language	Spanish	1,634	2.9%	
#4 LEP Language	Vietnamese	771	1.4%	
#5 LEP Language	Other Indo-European languages	434	0.8%	
#6 LEP Language	Arabic	432	0.8%	
#7 LEP Language	Other and unspecified languages	186	0.3%	
#8 LEP Language	French, Haitian, or Cajun	135	0.2%	
#9 LEP Language	Chinese	121	0.2%	
#10 LEP Language	Korean	66	0.1%	

### **Age Cohorts**

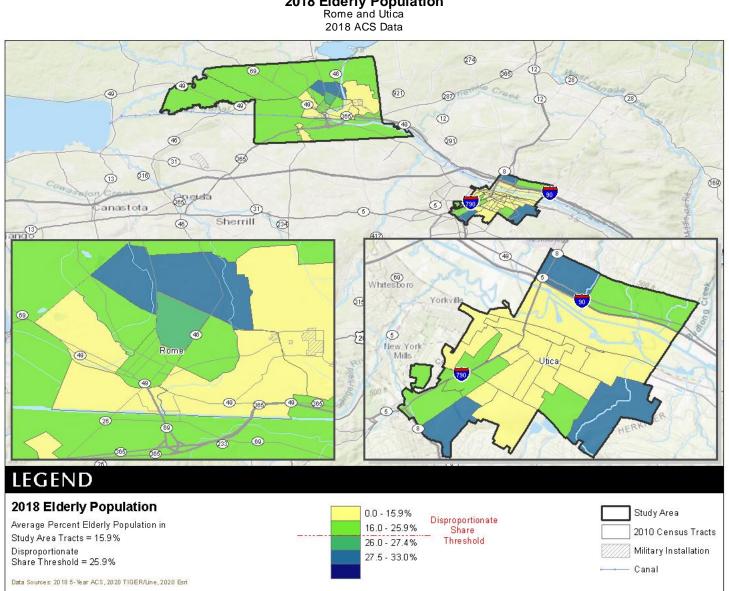
Table IV.7.A shows the population distribution in Rome city by age. In 2010, children under the age of 5 accounted for 6.1 percent of the total population, which compared to 6.7 percent in 2017.

	Table IV.7.A         Population Distribution by Age         Rome city         2018 Five-Year ACS Data						
A	2010 Cen	sus	2018 Five-Yea	Ir ACS			
Age	Number of Persons Percent Number of Persons Percent						
Under 5	2,074	6.1	2,162	6.7			
5 to 19	5,761 17.1 5,134 15.9						
20 to 24	2,271	6.7	2,084	6.4			
25 to 34	4,668	13.8	4,863	15.0			
35 to 54	9,152	27.1	7,404	22.9			
55 to 64	4,240	12.6	5,134	15.9			
65 or Older							
Total 33,725 100% 32,338 100%							

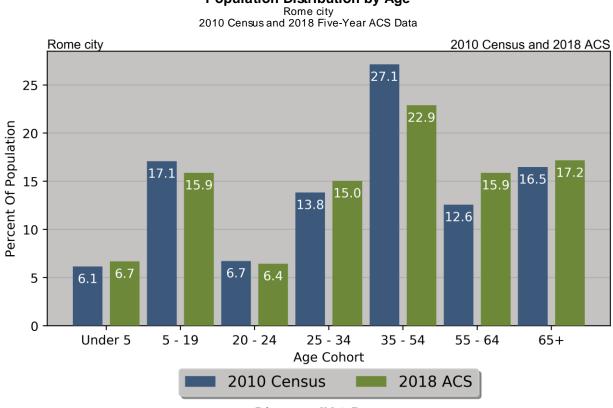
Table IV.7.B shows the population distribution in Utica city by age. In 2010, children under the age of 5 accounted for 7.5 percent of the total population, which compared to 7.1 percent in 2018.

	Table IV.7.B         Population Distribution by Age         Utica city         2018 Five-Year ACS Data						
A	2010 Cen	sus	2018 Five-Yea	nr ACS			
Age	Number of Persons	Percent	Number of Persons	Percent			
Under 5	4,665	7.5	4,288	7.1			
5 to 19	13,263 21.3 12,836 21.2						
20 to 24	5,179	8.3	5,162	8.5			
25 to 34	8,173	13.1	8,703	14.3			
35 to 54	15,104	24.3	13,976	23.0			
55 to 64	6,630	10.7	6,452	10.6			
65 or Older	65 or Older 9,221 14.8 9,258 15.3						
Total 62,235 100% 60,675 100%							

The geographical distribution of the elderly population is shown in Map IV.4, on the following page. The elderly population is more highly concentrated in northern central Rome and on the edges of Utica. These areas may need higher levels of services and accessible housing than other parts of the Cities.

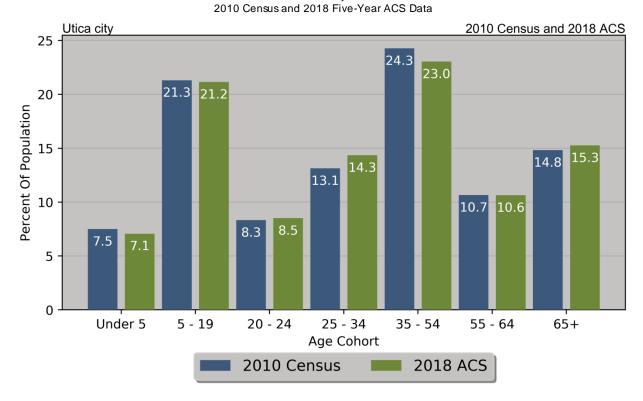


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## Diagram IV.2.A Population Distribution by Age

**Diagram IV.2.B** Population Distribution by Age Utica city



Rome and Utica Analysis of Impediments

#### **Education**

Education and employment data, as estimated by the 2018 ACS, is presented in Table IV.8. In 2018 in Rome, some 13,591 persons were employed and 654 were unemployed. This totaled a labor force of 14,245 persons. The unemployment rate for Rome city was estimated to be 4.6 percent in 2017.

Table IV.8.AEmployment, Labor Force and UnemploymentRome city2018 Five-Year ACS Data					
Employment Status 2018 Five-Year ACS					
Employed	13,591				
Unemployed 654					
Labor Force	14,245				
Unemployment Rate	4.6%				

In 2018 in Utica, some 24,480 persons were employed and 2,850 were unemployed. This totaled a labor force of 27,330 persons. The unemployment rate for Utica city was estimated to be 10.4 percent in 2018.

Table IV.8.BEmployment, Labor Force and UnemploymentUtica city2018 Five-Year ACS Data			
Employment Status 2018 Five-Year ACS			
Employed 24,480			
Unemployed 2,850			
Labor Force	27,330		
Unemployment Rate	10.4%		

In 2018 in Rome, 87.7 percent of households in Rome city had a high school education or greater.

Table IV.9.A         High School or Greater Education         Rome city         2018 Five-Year ACS Data		
Education Level Households		
High School or Greater	11,070	
Total Households 12,622		
Percent High School or Above	87.7%	

In 2018 in Utica, 81.9 percent of households in Utica city had a high school education or greater.

Table IV.9.BHigh School or Greater EducationUtica city2018 Five-Year ACS Data		
Education Level Households		
High School or Greater	19,263	
Total Households 23,520		
Percent High School or Above	81.9%	

As seen in Table IV.10.A, some 33.9 percent of the population in Rome had a high school diploma or equivalent, another 31.6 percent have some college, 13.0 percent have a Bachelor's Degree, and 7.4 percent of the population had a graduate or professional degree.

Table IV.10.AEducational AttainmentRome city2018 Five-Year ACS Data					
Education Level Population Percent					
Less Than High School	3,628	14.2%			
High School or Equivalent	8,688	33.9%			
Some College or Associates Degree	8,089	31.6%			
Bachelor'sDegree	3,324	13.0%			
Graduate or Professional Degree	1,893	7.4%			
Total Population Above 18 years25,622100.0%					

Some 30.4 percent of the population in Utica had a high school diploma or equivalent, another 34.0 percent have some college, 10.5 percent have a Bachelor's Degree, and 5.7 percent of the population had a graduate or professional degree.

Table IV.10.B         Educational Attainment         Utica city         2018 Five-Year ACS Data					
Education Level Population Percent					
Less Than High School	8,887	19.4%			
High School or Equivalent	13,885	30.4%			
Some College or Associates Degree	15,560	34.0%			
Bachelor'sDegree	4,805	10.5%			
Graduate or Professional Degree	2,588	5.7%			
Total Population Above 18 years45,725100.0%					

### **ECONOMICS**

#### Labor Force

Table IV.11.A shows the labor force statistics for Rome from 1990 to the present. Over the entire series, the lowest unemployment rate occurred in 2000 with a rate of 4.1 percent. The highest level of unemployment occurred during 2012 rising to a rate of 8.7 percent. This compared to a statewide low of 4.1 in 2018 and statewide high of 8.6 percent in 1992. Over the last year, the unemployment rate in Rome decreased from 5.1 percent in 2017 to 4.7 percent in 2018, which compared to a statewide decrease to 4.1 percent.

	Table IV.11.A Labor Force Statistics					
	Rome					
		19	90 - 2018 BLS [	Data		
		Ro	ome		Statewide	
Year	Unemployment	Employment	Labor Force	Unemployment Rate	Unemployment Rate	
1990	800	16,400	17,200	4.7%	5.3%	
1991	1,183	15,982	17,165	6.9%	7.2%	
1992	1,245	15,909	17,154	7.3%	8.6%	
1993	1,097	15,942	17,039	6.4%	7.9%	
1994	941	16,140	17,081	5.5%	6.9%	
1995	909	16,094	17,003	5.3%	6.3%	
1996	856	15,886	16,742	5.1%	6.2%	
1997	854	16,077	16,931	5%	6.4%	
1998	750	16,247	16,997	4.4%	5.6%	
1999	715	16,341	17,056	4.2%	5.2%	
2000	616	14,436	15,052	4.1%	4.5%	
2001	737	14,159	14,896	4.9%	4.8%	
2002	827	14,229	15,056	5.5%	6.1%	
2003	853	14,140	14,993	5.7%	6.4%	
2004	835	14,139	14,974	5.6%	5.8%	
2005	762	14,247	15,009	5.1%	5%	
2006	665	14,223	14,888	4.5%	4.5%	
2007	679	14,058	14,737	4.6%	4.6%	
2008	870	14,027	14,897	5.8%	5.4%	
2009	1,152	13,588	14,740	7.8%	8.3%	
2010	1,201	13,966	15,167	7.9%	8.6%	
2011	1,273	13,461	14,734	8.6%	8.3%	
2012	1,248	13,143	14,391	8.7%	8.5%	
2013	1,129	13,083	14,212	7.9%	7.7%	
2014	848	12,726	13,574	6.2%	6.3%	
2015	736	12,692	13,428	5.5%	5.3%	
2016	668	12,699	13,367	5%	4.9%	
2017	676	12,705	13,381	5.1%	4.7%	
2018	630	12,795	13,425	4.7%	4.1%	

Table IV.11.B shows the labor force statistics for Utica from 1990 to the present. Over the entire series the lowest unemployment rate occurred in 2000 with a rate of 4.3 percent. The highest level of unemployment occurred during 2012 rising to a rate of 10 percent. Over the last year, the unemployment rate in Utica decreased from 6 percent in 2017 to 5.2 percent in 2018.

Table IV.11.B         Labor Force Statistics         Utica city         1990 - 2018 BLS Data         Utica city					
1990	1,921	28,504	30,425	6.3%	5.3%
1991	2,841	27,776	30,617	9.3%	7.2%
1992	2,991	27,649	30,640	9.8%	8.6%
1993	2,636	27,707	30,343	8.7%	7.9%
1994	2,260	28,051	30,311	7.5%	6.9%
1995	2,184	27,972	30,156	7.2%	6.3%
1996	2,057	27,609	29,666	6.9%	6.2%
1997	2,051	27,942	29,993	6.8%	6.4%
1998	1,801	28,236	30,037	6.0%	5.6%
1999	1,716	28,400	30,116	5.7%	5.2%
2000	1,119	25,058	26,177	4.3%	4.5%
2001	1,246	24,597	25,843	4.8%	4.8%
2002	1,654	24,702	26,356	6.3%	6.1%
2003	1,582	24,524	26,106	6.1%	6.4%
2004	1,490	24,517	26,007	5.7%	5.8%
2005	1,375	24,680	26,055	5.3%	5.0%
2006	1,305	24,620	25,925	5.0%	4.5%
2007	1,225	24,335	25,560	4.8%	4.6%
2008	1,550	24,259	25,809	6.0%	5.4%
2009	2,178	23,615	25,793	8.4%	8.3%
2010	2,411	23,938	26,349	9.2%	8.6%
2011	2,426	23,138	25,564	9.5%	8.3%
2012	2,555	22,979	25,534	10.0%	8.5%
2013	2,221	22,886	25,107	8.8%	7.7%
2014	1,815	22,222	24,037	7.6%	6.3%
2015	1,497	22,127	23,624	6.3%	5.3%
2016	1,332	22,084	23,416	5.7%	4.9%
2017	1,419	22,047	23,466	6.0%	4.7%
2018	1,222	22,203	23,425	5.2%	4.1%

Diagram IV.3.A shows the employment and labor force for Rome. The difference between the two lines represents the number of unemployed persons. In the most recent year, employment stood at 12,795 persons, with the labor force reaching 13,425, indicating there were a total of 630 unemployed persons.

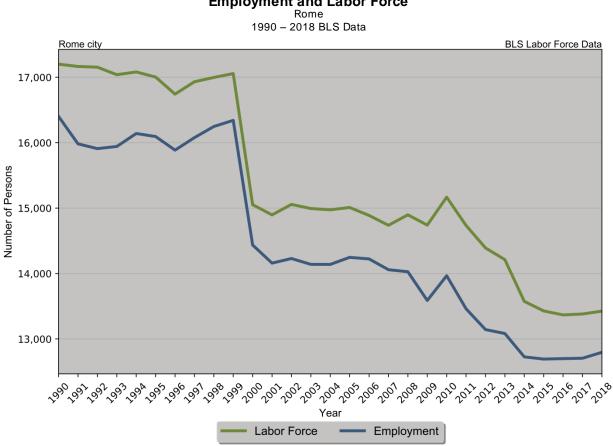
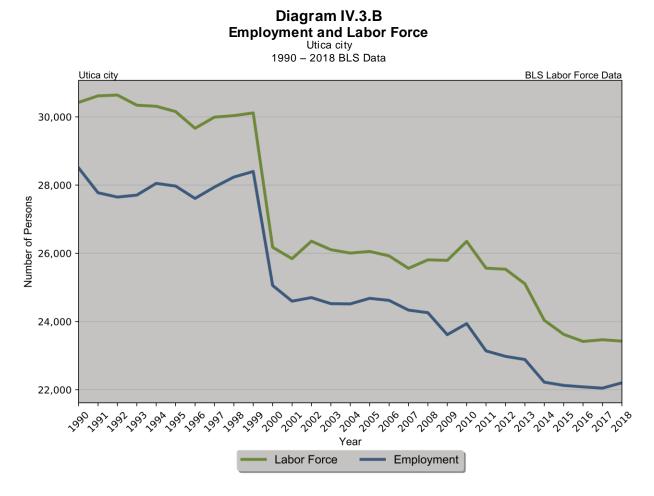


Diagram IV.3.A Employment and Labor Force

Diagram IV.3.B, shows the employment and labor force for Utica. In the most recent year, employment stood at 22,203 persons, with the labor force reaching 23,425, indicating there were a total of 1,222 unemployed persons.



#### Unemployment

Diagram IV.4.A shows the unemployment rate for both the State of New York and Rome. During the 1990's the average rate for Rome was 5.5 percent, which compared to 6.6 percent statewide. Between 2000 and 2010 the unemployment rate had an average of 5.4 percent, which compared to 5.6 percent statewide. Since 2010, the average unemployment rate was 6.7 percent. Over the course of the entire period the Rome had an average unemployment rate that lower than the State, 5.8 percent for Rome, versus 6.2 statewide.

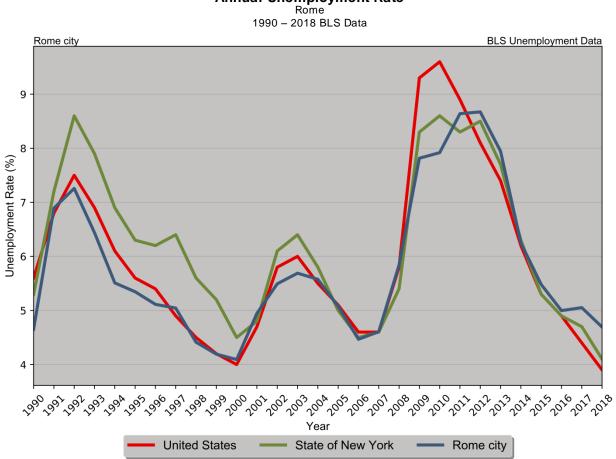
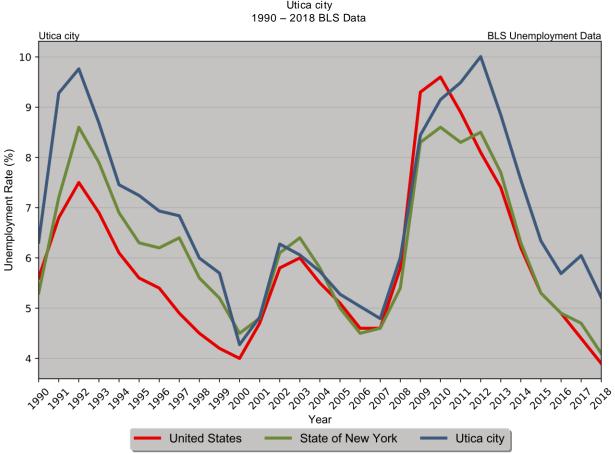


Diagram IV.4.A Annual Unemployment Rate

Diagram IV.4.B shows the unemployment rate for both the State and Utica. During the 1990's the average rate for Utica was 7.4 percent. Between 2000 and 2010 the unemployment rate had an average of 5.7 percent. Since 2010, the average unemployment rate was 7.7 percent. Over the course of the entire period the Utica had an average unemployment rate that higher than the State, at 6.9 percent for Utica, versus 6.2 statewide.



#### Diagram IV.4.B Annual Unemployment Rate Utica city 1990 – 2018 BLS Data

### Employment

Table IV.12.A shows Employment and Median Earnings by industry for Rome from the 2018 Five-Year American Community Survey (ACS). The top industry by number of people employed in Rome was Health Care in 2018. The Health Care industry employed 1,779 people in 2018, accounting for 18.9 percent of all employment in Rome, with industry-wide median earnings of \$38,813.

	Tabla							
0:0-		IV.12.A						
City	City Level Employment by Industry							
2018 Five Year ACS Data								
Industry	Total Employment	Percent of Employment	Median Earnings					
Admin	196	2%	\$33,804					
Arts	270	3%	\$29,511					
Construction	270	3%	\$47,262					
Education	780	8%	\$49,643					
Farming	0	0%	\$0					
Finance	467	5%	\$42,250					
Food	434	5%	\$25,313					
Health Care	1,779	19%	\$38,813					
Info	125	1%	\$50,341					
Management	0	0%	\$0					
Manufacturing	886	9%	\$45,938					
Mining	0	0%	\$0					
Other	337	4%	\$46,054					
Prof Service	773	8%	\$62,933					
Government	1,271	14%	\$62,274					
Real Estate	51	1%	\$27,292					
Retail	1,268	13%	\$32,667					
Transport	400	4%	\$34,583					
Utilities	29	0%	\$96,635					
Wholesale	92	1%	\$46,071					

Table IV.12.B shows Employment and Median Earnings by industry for Utica from the 2018 Five-Year ACS. The top industry by number of people employed in Utica was Health Care in 2018. The Health Care industry employed 3,304 people in 2018, accounting for 21.2 percent of all employment in Utica, with industry-wide median earnings of \$32,716. Diagrams IV.5.A and IV.5.B display employment and earnings data for 2018 in Rome and Utica.

Table IV.12.B         City Level Employment by Industry         Utica city         2018 Five Year ACS Data						
Industry	Total Employment	Percent of Employment	Median Earnings			
Admin	612	4%	\$33,561			
Arts	393	3%	\$32,995			
Construction	528	3%	\$36,224			
Education	1,337	9%	\$46,006			
Farming	46	0%	\$35,000			
Finance	1,186	8%	\$48,293			
Food	706	5%	\$24,792			
Health Care	3,304	21%	\$32,716			
Info	374	2%	\$33,023			
Management	0	0%	\$0			
Manufacturing	2,016	13%	\$31,170			
Mining	0	0%	\$0			
Other	838	5%	\$28,811			
Prof Service	432	3%	\$41,184			
Government	1,033	7%	\$63,322			
Real Estate	378	2%	\$36,618			
Retail	1,450	9%	\$29,459			
Transport	519	3%	\$37,034			
Utilities	134	1%	\$29,135			
Wholesale	289	2%	\$37,422			

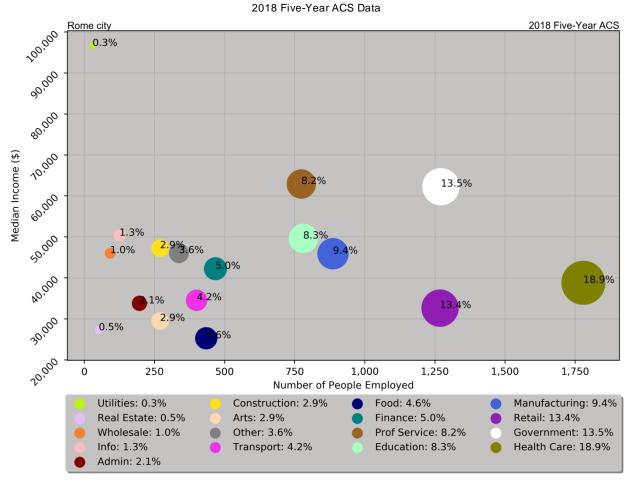
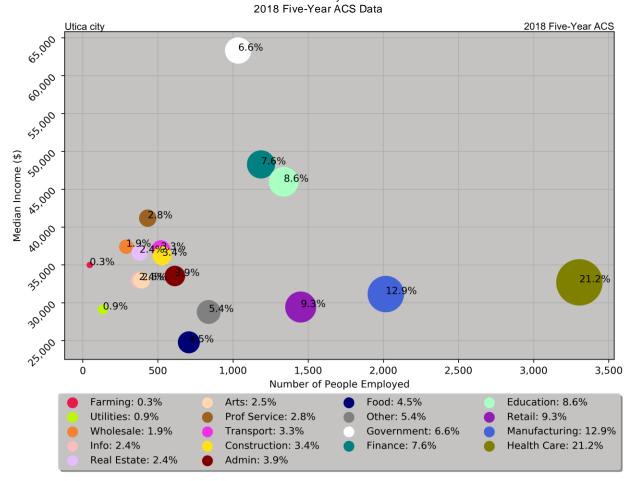


Diagram IV.5.A Employment and Median Earnings by Industry Rome



#### Diagram IV.5.B Employment and Median Earnings by Industry Utica city

### **Earnings: Oneida County**

The Bureau of Economic Analysis (B.E.A.) produces regional economic accounts, which provide a consistent framework for analyzing and comparing individual state and local area economies. Diagram IV.6 shows real average earnings per job for Oneida County from 1990 to 2018. Over this period the average earning per job for Oneida County was 49,672 dollars, which was lower than the statewide average of 73,140 dollars over the same period.

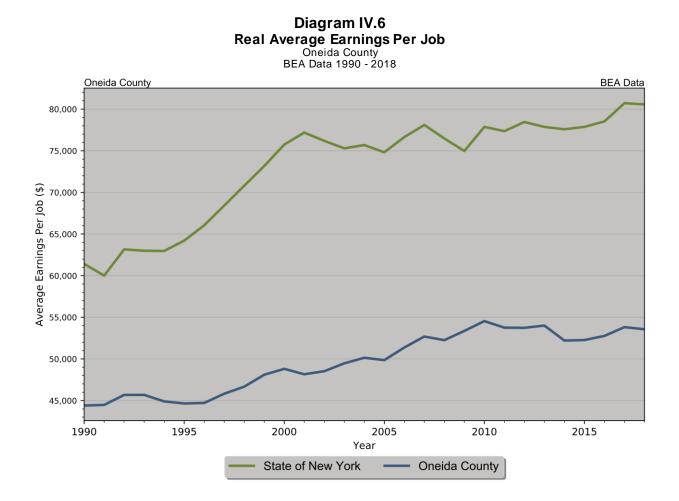
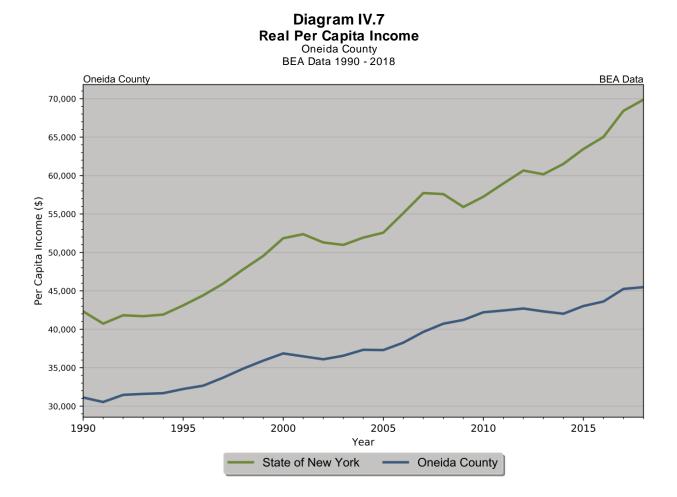


Diagram IV.7 shows real per capita income for the Oneida County from 1990 to 2018, which is calculated by dividing total personal income from all sources by population. Per capita income is a broader measure of wealth than real average earnings per job, which only captures the working population. Over this period, the real per capita income for Oneida County was 37,773 dollars, which was lower than the statewide average of 53,171 dollars over the same period.



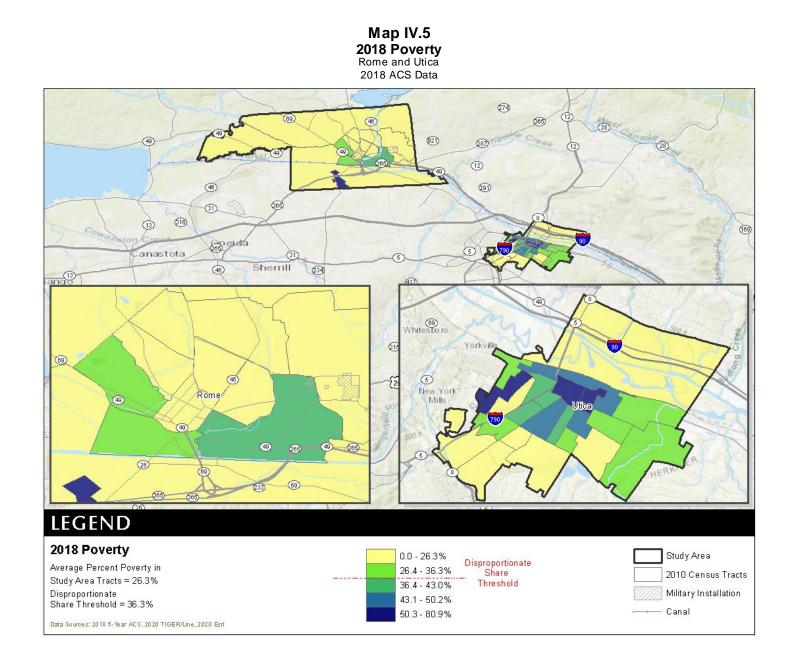
### Poverty

The rate of poverty for Rome is shown in Table IV.13.A. In 2018, there were an estimated 5,803 persons living in poverty. This represented a 19.3 percent poverty rate, compared to 15.0 percent poverty in 2000. In 2018, some 15.7 percent of those in poverty were under age 6, and 7.9 percent were 65 or older.

Table IV.13.APoverty by Age Rome2000 Census SF3 & 2018 Five-Year ACS Data						
<b>A</b>	2000 Census		2018 Five-Year ACS			
Age	Persons in Poverty	% of Total	Persons in Poverty	% of Total		
Under 6	714	15.1%	912	15.7%		
6 to 17	1,036	21.9%	1,000	17.2%		
18 to 64	2,570	54.4%	3,433	59.2%		
65 or Older	408	8.6%	458	7.9%		
Total	Total 4,728 100% 5,803 100%					
Poverty Rate	15%	•	19.3%	•		

The rate of poverty for Utica is shown in Table IV.13.B. In 2018, there were an estimated 17,415 persons living in poverty. This represented a 30.0 percent poverty rate, compared to 24.5 percent poverty in 2000. In 2018, some 14.5 percent of those in poverty were under age 6, and 7.8 percent were 65 or older.

Table IV.13.BPoverty by AgeUtica city2000 Census SF3 & 2018 Five-Year ACS Data						
A.c.o.	2000 Census		2018 Five-Year ACS			
Age	Persons in Poverty	% of Total	Persons in Poverty	% of Total		
Under6	2,069	14.6%	2,533	14.5%		
6 to 17	3,466	24.5%	4,182	24.0%		
18 to 64	7,388	52.2%	9,345	53.7%		
65 or Older	1,231	8.7%	1,355	7.8%		
Total 14,154 100.0% 17,415 100.0%						
Poverty Rate	24.5%	-	30.0%	-		



## HOUSING

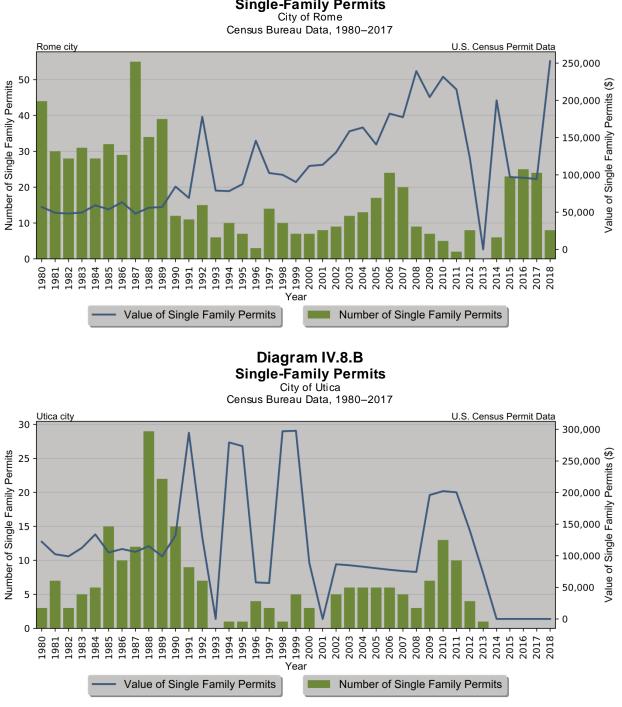
### **Housing Production**

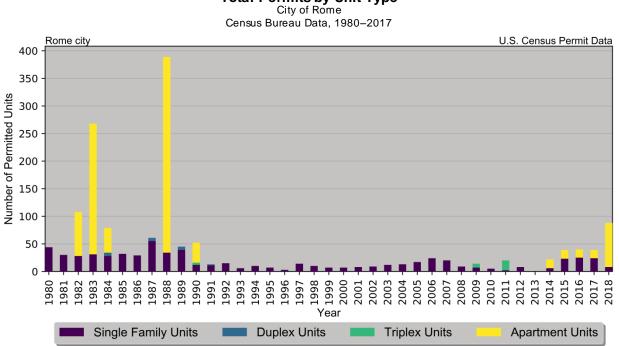
The Census Bureau reports building permit authorizations and "per unit" valuation of building permits by county annually. Single-family construction usually represents most residential development in the cities. Single-family building permit authorizations in Rome decreased from 24 authorizations in 2017 to eight in 2018, while there were zero permits authorized in Utica in 2017 and 2018.

The real value of single-family building permits increased from 94,398 dollars in 2017 to 252,595 dollars in 2018 in Rome. This compares to an increase in permit value statewide, with values rising from 309,281 dollars in 2017 to 300,630 dollars in 2018. Additional details are given in Tables IV.14.A and IV.14.B.

	Table IV.14.A         Building Permits and Valuation         City of Rome         Census Bureau Data, 1980–2018						
		Authorized Cor	nstruction in Perr	nit Issuing Areas			/aluation, 2017\$)
Year	Single- Family	Duplex Units	Tri- and Four-Plex	Multi-Family Units	Total Units	Single-Family Units	Multi-Family Units
1980	44	0	0	0	44	56,969	0
1981	30	0	0	0	30	49,085	0
1982	28	0	0	80	108	48,112	91,470
1983	31	0	0	237	268	49,480	56,643
1984	28	6	0	45	79	59,246	51,921
1985	32	0	0	0	32	53,724	0
1986	29	0	0	0	29	63,363	0
1987	55	6	0	0	61	47,983	0
1988	34	0	0	355	389	55,958	38,562
1989	39	6	0	0	45	56,839	0
1990	12	0	4	36	52	84,260	58,822
1991	11	2	0	0	13	69,047	0
1992	15	0	0	0	15	178,015	0
1993	6	0	0	0	6	78,912	0
1994	10	0	0	0	10	78,212	0
1995	7	0	0	0	7	87,541	0
1996	3	0	0	0	3	145,840	0
1997	14	0	0	0	14	102.464	0
1998	10	Õ	Ő	Õ	10	100,149	Õ
1999	7	0	0	0	7	90,376	0
2000	7	0	0	0	7	112.041	0
2001	8	Õ	Õ	Õ	8	113,524	Õ
2002	9	0	0	0	9	130,148	0
2003	12	0	ů 0	0	12	158,524	Õ
2004	13	0	0 0	Õ	13	163,612	õ
2005	17	0 0	0	Õ	17	140,756	Õ
2006	24	0	0	0	24	182,229	0
2007	20	Ő	Ő	Õ	20	177,448	Õ
2008	9	0 0	0	Õ	9	239,249	Õ
2009	7	0	7	0	14	204,420	0
2010	5	Ő	0	õ	5	231,704	õ
2011	2	0	18	0	20	214,703	0 0
2012	8	0	0	0	8	122,739	0 0
2012	0	0	0	0	0	0	0
2013	6	0	0 0	16	22	200,022	176,171
2015	23	0	õ	16	39	97,173	194,474
2016	25	0	Ő	15	40	96.172	192,471
2010	23	0	0	15	39	94,398	188,920
2018	8	Ő	Ő	80	88	252,595	228,938

	Table IV.14.B         Building Permits and Valuation         City of Utica         Census Bureau Data, 1980–2018							
X		Authorized Cor	Per Unit Valuation, (Real 2017\$)					
Year	Single- Family	Duplex Units	Tri- and Four-Plex	Multi-Family Units	Total Units	Single-Family Units	Multi-Family Units	
1980	3	0	0	60	63	122,187	75,315	
1981	7	4	0	139	150	102,338	73,478	
1982	3	6	0	16	25	99,093	100,046	
1983	5	0	0	0	5	112,456	0	
1984	6	0	0	103	109	133,815	65,371	
1985	15	0	0	0	15	105,140	0	
1986	10	4	0	0	14	110,674	0	
1987	12	4	0	0	16	106,116	0	
1988	29	0	0	0	29	115,251	0	
1989	22	0	0	0	22	99,138	0	
1990	15	4	0	34	53	132,355	51,900	
1991	9 7	4	0	0	13	294,671	0	
1992	0	4	0	10 0	21	129,219 0	12,016 0	
1993 1994	0	2	0	50	2 51	279,330	91,939	
1994	1	0	0	42	43	273,566	90,042	
1995	4	0	0	42 32	43 36	57,779	90,042 82,747	
1990	4 3	0	0	30	33	56,802	81,348	
1998	1	0	0	0	1	297,015	01,340	
1999	5	Õ	0	Õ	5	297,796	Õ	
2000	3	2	0	Õ	5	88,742	0	
2001	õ	ō	õ	Õ	Ő	0	Õ	
2002	5	0	4	0	9	86,498	0	
2003	6	0	3	0	9	84,921	0	
2004	6	0	3	0	9	82,693	0	
2005	6	0	3	0	9	80,195	0	
2006	6	0	3	0	9	77,844	0	
2007	5	0	3	0	8	75,802	0	
2008	3	0	0	0	3	74,357	0	
2009	7	2	4	82	95	196,105	302,610	
2010	13	2	0	0	15	202,245	0	
2011	10	0	0	0	10	200,389	0	
2012	4	24	0	9	37	139,888	194,275	
2013	1	0	0	0	1	71,768	0	
2014	0	0	0	0	0	0	0	
2015	0	0	0	0	0	0	0	
2016	0	0	0	0	0	0	0	
2017	0	0	0	0	0	0	0	
2018	0	0	0	0	0	0	0	

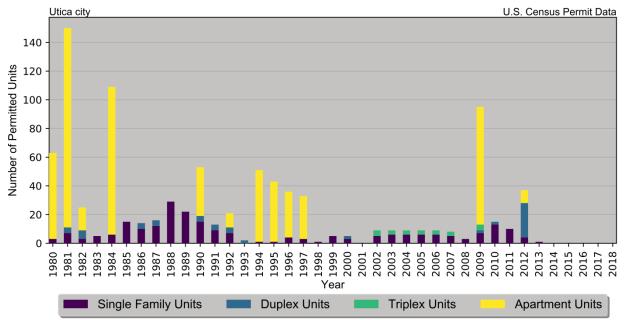




#### Diagram IV.9.A Total Permits by Unit Type City of Rome

#### Diagram IV.9.B Total Permits by Unit Type City of Utica

Census Bureau Data, 1980–2017



## **Housing Characteristics**

Households by type and tenure are shown in Tables IV.15.A and IV.15.B. Family households represented 59.6 percent of households in Rome, while non-family households accounted for 40.4 percent. These changed from 58.6 percent and 41.4 percent, respectively. In Utica, family households represented 57.6 percent of households, while non-family households accounted for 42.4 percent. These changed from 56.4 percent and 43.6 percent, respectively.

Table IV.15.A         Household Type by Tenure         City of Rome         2010 Census SF1 & 2018 Five-Year ACS Data						
Household Type		Census		e-Year ACS		
	Households	Households	Households	% of Total		
Family Households	7,926	58.6%	7,522	59.6%		
Married-Couple Family	5,101	64.4%	5,028	66.8%		
Owner-Occupied	4,085	80.1%	4,004	79.6%		
Renter-Occupied	1,016	19.9%	1,024	20.4%		
Other Family	2,825	35.6%	2,494	37.6%		
Male Householder, No Spouse Present	765	27.1%	610	30.7%		
Owner-Occupied	420	54.9%	288	47.2%		
Renter-Occupied	345	45.1%	322	52.8%		
Female Householder, No Spouse Present	2,060	72.9%	1,884	82.6%		
Owner-Occupied	842	40.9%	652	34.6%		
Renter-Occupied	1,218	59.1%	1,232	65.4%		
Non-Family Households	5,600	41.4%	5,100	40.4%		
Owner-Occupied	2,427	43.3%	2,127	41.7%		
Renter-Occupied	3,173	56.7%	2,973	58.3%		
Total	13,526	100.0%	12,622	100.0%		

Table IV.15.B         Household Type by Tenure         City of Utica         2010 Census SF1 & 2018 Five-Year ACS Data						
Household Type	2010	Census	2018 Fiv	e-Year ACS		
	Households	Households	Households	% of Total		
Family Households	14,044	56.4%	13,556	57.6%		
Married-Couple Family	7,931	56.5%	7,508	55.4%		
Owner-Occupied	5,656	71.3%	5,155	68.7%		
Renter-Occupied	2,275	28.7%	2,353	31.3%		
Other Family	6,113	43.5%	6,048	45.1%		
Male Householder, No Spouse Present	1,387	22.7%	1,604	22.9%		
Owner-Occupied	653	47.1%	752	46.9%		
Renter-Occupied	734	52.9%	852	53.1%		
Female Householder, No Spouse Present	4,726	77.3%	4,444	78.1%		
Owner-Occupied	1,482	31.4%	1,434	32.3%		
Renter-Occupied	3,244	68.6%	3,010	67.7%		
Non-Family Households	10,861	43.6%	9,964	42.4%		
Owner-Occupied	4,050	37.3%	3,909	39.2%		
Renter-Occupied	6,811	62.7%	6,055	60.8%		
Total	24,905	100.0%	23,520	100.0%		

Tables IV.16.A and IV.16.B show housing units by type in 2010 and 2018. In 2010 in Rome, there were 15,315 housing units, compared with 14,887 in 2018. Single-family units accounted for 57.8 percent of units in 2018, compared to 55.2 in 2010. Apartment units accounted for 14.6 percent in 2018, compared to 16.8 percent in 2010. In 2010 in Utica, there were 28,601 housing units,

compared with 28,333 in 2018. Single-family units accounted for 41.5 percent of units in 2018, compared to 42.2 in 2010. Apartment units accounted for 17.5 percent in 2018, compared to 17.3 percent in 2010.

Table IV.16.AHousing Units by TypeCity of Rome2010 & 2018 Five-Year ACS Data						
	2010 Fiv	ve-Year ACS	2018 Fiv	ve-Year ACS		
Unit Type	Units	% of Total	Units	% of Total		
Single-Family	8,455	55.2%	8,609	57.8%		
Duplex	2,331	15.2%	2,218	14.9%		
Tri-or Four-Plex	1,425	9.3%	1,502	10.1%		
Apartment	2,578	16.8%	2,175	14.6%		
MobileHome	526	3.4%	383	2.6%		
Boat, RV, Van, Etc.	0	0%	0	0%		
Total	15,315	100.0%	14,887	100.0%		

Table IV.16.BHousing Units by TypeCity of Utica2010 & 2018 Five-Year ACS Data							
Linit Trme	2010 Fiv	e-Year ACS	2018 Fiv	ve-Year ACS			
Unit Type	Units	% of Total	Units	% of Total			
Single-Family	12,075	42.2%	11,762	41.5%			
Duplex	8,365	29.2%	8,222	29.0%			
Tri-or Four-Plex	3,053	10.7%	3,341	11.8%			
Apartment	4,939	17.3%	4,954	17.5%			
MobileHome	147	0.5%	54	0.2%			
Boat, RV, Van, Etc.	22	0.1%	0	0%			
Total	28,601	100.0%	28,333	100.0%			

Tables IV.17.A and IV.17.B show housing units by tenure from 2010 to 2018. By 2018, there were 14,887 housing units in Rome. An estimated 56.0 percent were owner-occupied, and 15.2 percent were vacant. By 2018 in Utica, there were 28,333 housing units. An estimated 47.8 percent were owner-occupied, and 17.0 percent were vacant.

Table IV.17.A         Housing Units by Tenure         City of Rome         2010 Census & 2018 Five-Year ACS Data						
Tenure	2010 Census		2018 Five	-Year ACS		
ienure	Units	% of Total	Units	% of Total		
Occupied Housing Units	13,526	90.8%	12,622	84.8%		
Owner-Occupied	7,774	57.5%	7,071	56.0%		
Renter-Occupied	5,752	42.5%	5,551	44.0%		
Vacant Housing Units         1,367         9.2%         2,265         15.2%						
Total Housing Units	14,893	100.0%	14,887	100.0%		

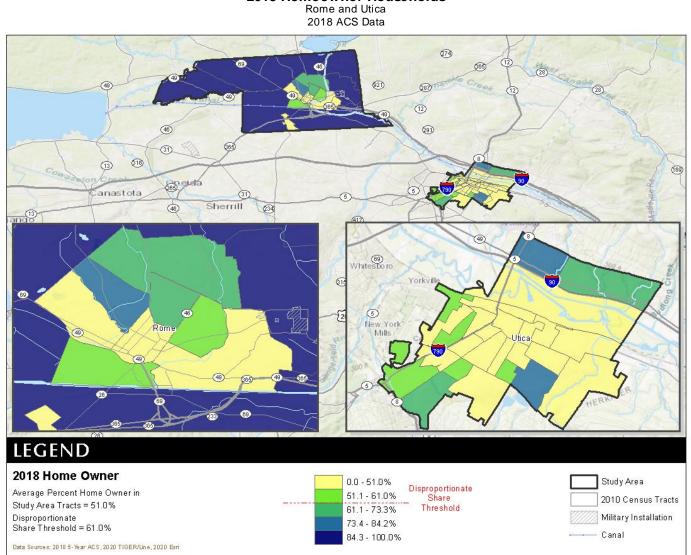
Table IV.17.B         Housing Units by Tenure         City of Utica         2010 Census & 2018 Five-Year ACS Data						
Tenure	2010	Census	2018 Five	-Year ACS		
lenure	Units	% of Total	Units	% of Total		
Occupied Housing Units	24,905	88.4%	23,520	83.0%		
Owner-Occupied	11,841	47.5%	11,250	47.8%		
Renter-Occupied	13,064	52.5%	12,270	52.2%		
Vacant Housing Units 3,261 11.6% 4,813 17.0%						
Total Housing Units	28,166	100.0%	28,333	100.0%		

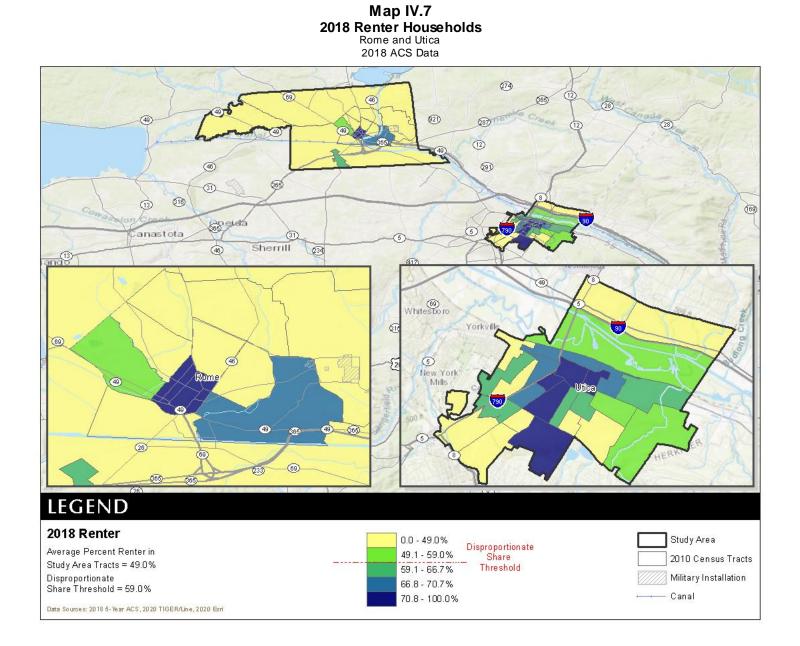
The outskirts of both Cities have higher rates of homeownership, as seen in Map IV.6, on the following page. Conversely, there tend to be higher rates of renter households in the central parts of the Cities. The areas with higher rates of renters also correspond with many of the areas in the Cities that see higher rates of poverty. Housing prices also tended to be higher on the outskirts of the Cities and lower in the central parts of the Cities.

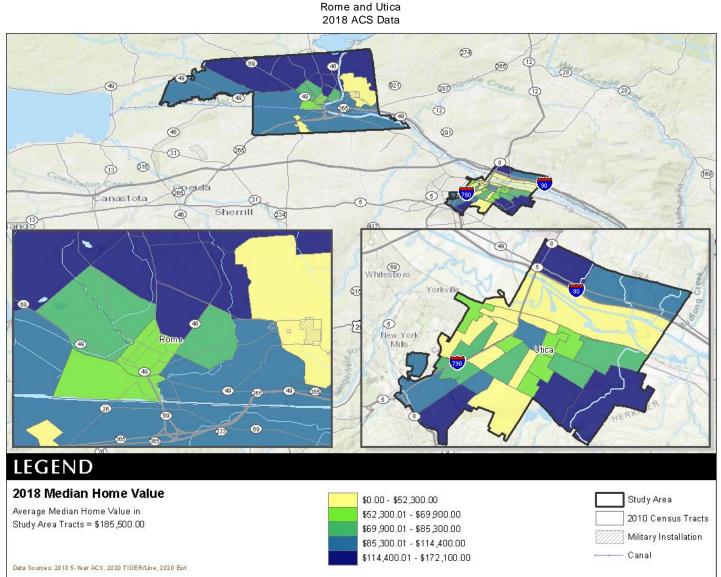
Households by income for the 2010 and 2018 5-year ACS are shown in Tables IV.18.A and IV.18.B. In Rome, households earning more than 100,000 dollars per year represented 17.4 percent of households in 2018, compared to 10.1 percent in 2010. Meanwhile, households earning less than 15,000 dollars accounted for 14.4 percent of households in 2018, compared to 14.4 percent in 2000. In Utica, households earning more than 100,000 dollars per year represented 12.0 percent of households in 2018, compared to 7.8 percent in 2010. Meanwhile, households earning less than 15,000 dollars accounted for 22.2 percent of households in 2018, compared to 23.8 percent in 2000.

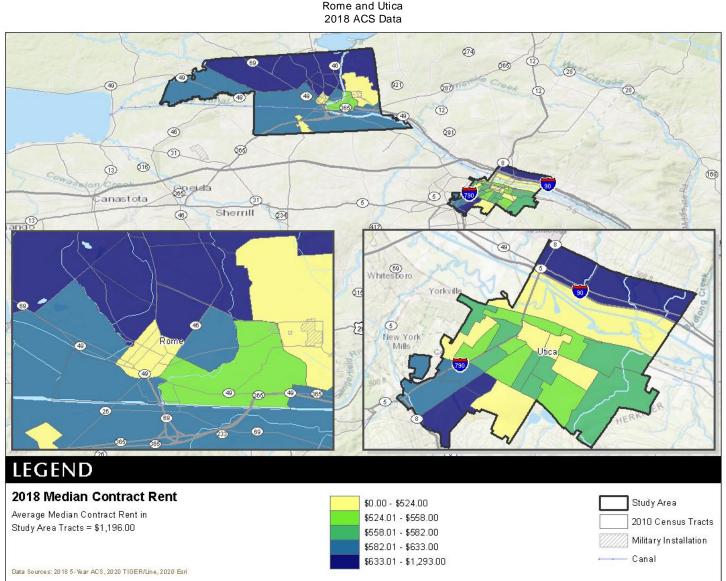
Table IV.18.AHouseholds by IncomeCity of Rome2010 & 2018 Five-Year ACS Data								
Income	2010 Five-	Year ACS	2018 Fiv	e-Year ACS				
income	Households	% of Total	Households	% of Total				
Less than \$15,000	1,980	14.4%	1,817	14.4%				
\$15,000 to \$19,999	1,014	7.4%	663	5.3%				
\$20,000 to \$24,999	1,065	7.8%	657	5.2%				
\$25,000 to \$34,999	1,654	12.0%	1,601	12.7%				
\$35,000 to \$49,999	2,198	16.0%	1,706	13.5%				
\$50,000 to \$74,999	2,863	20.9%	2,559	20.3%				
\$75,000 to \$99,999	1,573	11.5%	1,427	11.3%				
\$100,000 or More	1,383	10.1%	2,192	17.4%				
Total	13,730	100.0%	12,622	100.0%				

Table IV.18.BHouseholds by IncomeCity of Utica2010 & 2018 Five-Year ACS Data								
2010 Five-Year ACS 2018 Five-Year ACS								
Income	Households	% of Total	Households	% of Total				
Less than \$15,000	5,890	23.8%	5,224	22.2%				
\$15,000 to \$19,999	2,365	9.6%	1,966	8.4%				
\$20,000 to \$24,999	2,063	8.3%	1,764	7.5%				
\$25,000 to \$34,999	2,996	12.1%	2,669	11.3%				
\$35,000 to \$49,999	3,551	14.4%	3,261	13.9%				
\$50,000 to \$74,999	3,695	14.9%	3,924	16.7%				
\$75,000 to \$99,999	2,247	9.1%	1,883	8.0%				
\$100,000 or More	1,937	7.8%	2,829	12.0%				
Total	24,744	100.0%	23,520	100.0%				









Map IV.9 2018 Median Contract Rent Rome and Utica

Tables IV.19.A and IV.19.B show households by year home built for the 2010 and 2018 5-year ACS data. In Rome, housing units built between 2000 and 2009, account for 1.6 percent of households in 2010 and 0.9 percent of households in 2018. Housing units built in 1939 or earlier represented 30.3 percent of households in 2018 and 34.4 percent of households in 2010. In Utica, housing units built between 2000 and 2009, account for 0.8 percent of households in 2010 and 1.8 percent of households in 2018. Housing units built in 1939 or earlier represented 53.0 percent of households in 2018 and 50.7 percent of households in 2010.

Table IV.19.AHouseholds by Year Home BuiltCity of Rome2010 & 2018 Five-Year ACS Data								
Year Built	2010 Five-	Year ACS	2018 Five-Y	'ear ACS				
fear Bullt	Households	% of Total	Households	% of Total				
1939 or Earlier	4,718	34.4%	3,823	30.3%				
1940 to 1949	1,596	11.6%	1,651	13.1%				
1950 to 1959	2,991	21.8%	2,873	22.8%				
1960 to 1969	1,262	9.2%	1,218	9.6%				
1970 to 1979	1,795	13.1%	1,500	11.9%				
1980 to 1989	673	4.9%	1,062	8.4%				
1990 to 1999	479	3.5%	261	2.1%				
2000 to 2009	216	1.6%	113	0.9%				
2010 or Later			121	1.0%				
Total	13,730	100.0%	12,622	100.0%				

Table IV.19.BHouseholds by Year Home BuiltCity of Utica2010 & 2018 Five-Year ACS Data							
Year Built	2010 Five-	Year ACS	2018 Five-Y	'ear ACS			
rear bane	Households	% of Total	Households	% of Total			
1939 or Earlier	12,553	50.7%	12,465	53.0%			
1940 to 1949	2,496	10.1%	1,845	7.8%			
1950 to 1959	4,430	17.9%	3,673	15.6%			
1960 to 1969	2,325	9.4%	2,189	9.3%			
1970 to 1979	1,395	5.6%	1,345	5.7%			
1980 to 1989	663	2.7%	962	4.1%			
1990 to 1999	691	2.8%	551	2.3%			
2000 to 2009	191	0.8%	418	1.8%			
2010 or Later			72	0.3%			
Total	24,744	100.0%	23,520	100.0%			

The distribution of unit type by race is shown in Tables IV.20.A and IV.20.B. In Rome, an estimated 62.3 percent of white households occupy single-family homes, while 31.3 percent of black households do. Some 14.6 percent of white households occupied apartments, while 28.1 percent of black households do. An estimated 41.2 percent of Asian households and 100.0 percent of American Indian households occupy single-family homes. In Utica, an estimated 52.2 percent of white households occupy single-family homes, while 23.9 percent of black households do. Some 16.4 percent of white households occupied apartments, while 23.2 percent of black households do. An estimated 31.2 percent of Asian households and 45.2 percent of American Indian households occupied apartments, while 23.2 percent of black households do. An estimated 31.2 percent of Asian households and 45.2 percent of American Indian households occupied.

Table IV.20.A         Distribution of Units in Structure by Race         City of Rome         2018 Five-Year ACS Data								
Unit Type	White	Black	American Indian	Asian	Native Hawaiian/Pacific Islanders	Other	Two or More Races	
Single-Family	62.3%	31.3%	100.0%	41.2%	0%	37.5%	42.1%	
Duplex	13.3%	17.7%	0%	7.6%	0%	4.2%	8.3%	
Tri-or Four- Plex	7.5%	22.9%	0%	16.8%	0%	0%	15.8%	
Apartment	14.6%	28.1%	0%	34.4%	0%	51.0%	20.3%	
Mobile Home	2.3%	0%	0%	0%	0%	7.3%	13.5%	
Boat, RV, Van, Etc.	0%	0%	0%	0%	0%	0%	0%	
Total	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	

Table IV.20.B         Distribution of Units in Structure by Race         City of Utica         2018 Five-Year ACS Data								
Unit Type	White	Black	American Indian	Asian	Native Hawaiian/Pacific Islanders	Other	Two or More Races	
Single-Family	52.2%	23.9%	45.2%	31.2%	100.0%	27.3%	22.7%	
Duplex	23.6%	38.8%	11.0%	44.0%	0%	34.5%	24.2%	
Tri-or Four- Plex	7.6%	14.1%	28.8%	10.7%	0%	10.8%	35.8%	
Apartment	16.4%	23.2%	15.1%	14.1%	0%	26.1%	15.9%	
Mobile Home	0.2%	0%	0%	0%	0%	1.3%	1.4%	
Boat, RV, Van, Etc.	0%	0%	0%	0%	0%	0%	0%	
Total	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	

The disposition of vacant units between 2010 and 2018 are shown in Tables IV.21.A and IV.21.B. In Rome, for rent units accounted for 9.5 percent of vacant units, while for sale units accounted for 7.2 percent. "Other" vacant units accounted for 63.2 percent of vacant units, representing a total of 1,431 "other" vacant units. In Utica, for rent units accounted for 21.2 percent of vacant units, while for sale units accounted for 6.4 percent. "Other" vacant units accounted for 59.5 percent of vacant units, representing a total of 2,865 "other" vacant units.

Table IV.21.A         Disposition of Vacant Housing Units         City of Rome         2010 Census & 2018 Five-Year ACS Data								
Dispesition	2010 (	2010 Census 2018 Five-Year A						
Disposition	Units	% of Total	Units	% of Total				
For Rent	560	41.0%	215	9.5%				
For Sale	167	12.2%	163	7.2%				
Rented Not Occupied	26	1.9%	131	5.8%				
Sold Not Occupied	59	4.3%	147	6.5%				
For Seasonal, Recreational, or Occasional Use	61	4.5%	178	7.9%				
For Migrant Workers	0	0%	0	0%				
OtherVacant	494	36.1%	1,431	63.2%				
Total	1,367	100.0%	2,265	100.0%				

Table IV.21.BDisposition of Vacant Housing UnitsCity of Utica2010 Census & 2018 Five-Year ACS Data								
Disposition	2010 0	Census	2018 Fiv	e-Year ACS				
Disposition	Units	% of Total	Units	% of Total				
For Rent	1,181	36.2%	1,018	21.2%				
For Sale	312	9.6%	308	6.4%				
Rented Not Occupied	70	2.1%	318	6.6%				
Sold Not Occupied	101	3.1%	175	3.6%				
For Seasonal, Recreational, or Occasional Use	121	3.7%	129	2.7%				
For Migrant Workers	0	0%	0	0%				
OtherVacant	1,476	45.3%	2,865	59.5%				
Total	3,261	100.0%	4,813	100.0%				

The age of a structure influences its value. As shown in Tables IV.22.A, structures built in Rome in 1939 or earlier had a median value of 80,400 dollars, while structures built between 1950 and 1959 had a median value of 97,700 dollars, and those built between 1990 and 1999 had a median value of 120,700 dollars. The newest structures tended to have the highest values and those built between 2010 and 2013 had median values of 251,300 dollars. The total median value in City of Rome was 94,800 dollars. As shown in Table IV.22.B, structures built in Utica in 1939 or earlier had a median value of 80,500 dollars, while structures built between 1950 and 1959 had a median value of 98,100 dollars, and those built between 1990 and 1999 had a median value of 125,000 dollars.

Table IV.22.AOwner Occupied Median Value by YearStructure BuiltCity of Rome2018 Five-Year ACS Data					
Year Structure Built Median Value					
1939 or earlier	80,400				
1940 to 1949	83,400				
1950 to 1959	97,700				
1960 to 1969	119,000				
1970 to 1979	133,000				
1980 to 1989	120,500				
1990 to 1999	120,700				
2000 to 2009	194,900				
2010 to 2013	251,300				
2014 or later	0				
Median Value	94,800				

Table IV.22.BOwner Occupied Median Value by YearStructure BuiltCity of Utica2018 Five-Year ACS Data					
Year Structure Built Median Value					
1939 or earlier	80,500				
1940 to 1949	82,100				
1950 to 1959	98,100				
1960 to 1969	114,000				
1970 to 1979	140,800				
1980 to 1989	123,800				
1990 to 1999	125,000				
2000 to 2009	84,600				
2010 to 2013	0				
2014 or later	0				
Median Value	90,700				

## **B.** SEGREGATION AND INTEGRATION

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

### A Technical Note on the Dissimilarity Index Methodology

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

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

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

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

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

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

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

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

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

### Segregation Levels

Diagram IV.11.A shows the dissimilarity index by racial type in 2000, 2010, and 2017 in Rome. In 2017, American Indian, Asian, and "other" race households had moderate or high levels of segregation. Black households had a moderate level of segregation in 2010, which declined to a low level by 2017.

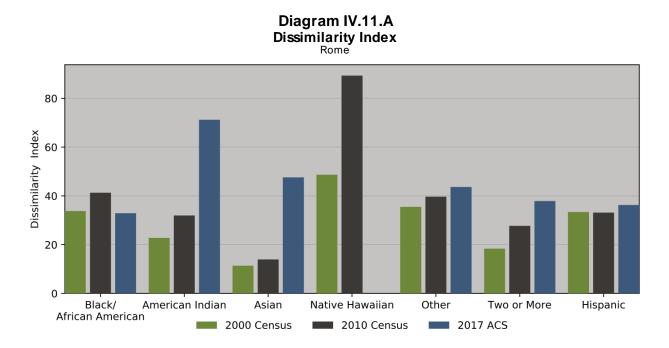
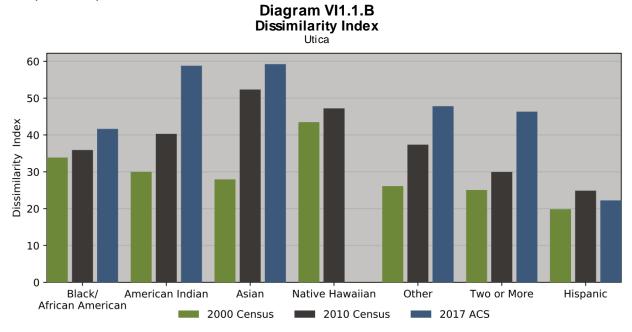


Diagram IV.11.B shows the dissimilarity index by racial type in 2000, 2010, and 2017 in Utica. In 2017, black, American Indian, Asian, "other" race, and two or more race households had moderate or high levels of segregation. The level of segregation is increasing in the City in all racial groups except for Hispanic households.



# C. DISPARITIES IN ACCESS TO OPPORTUNITY

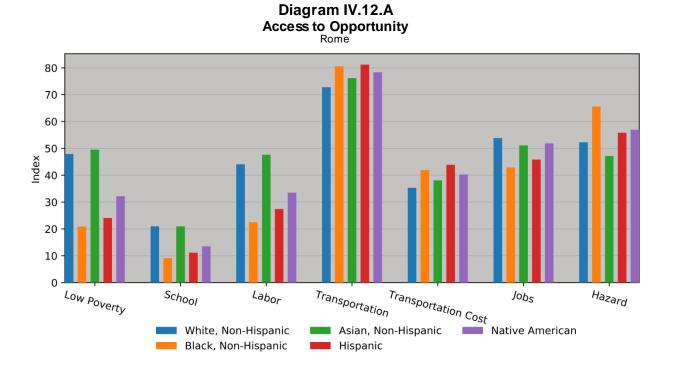
The following section describes the HUD defined terms of Access to Opportunity. These measures, as outlined below, describe a set of conditions that may or may not accurately reflect the actual conditions in the study area. These data are supplemented by local data when available and ultimately provide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

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

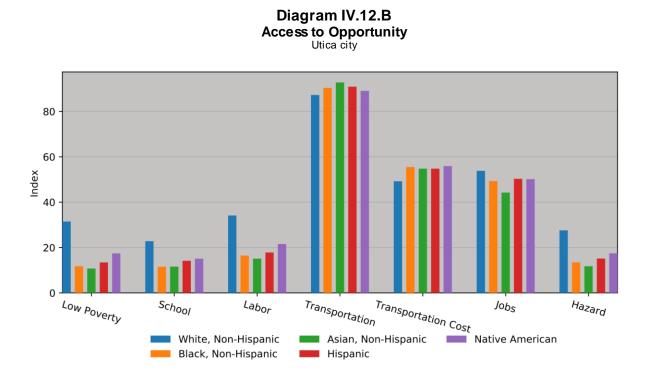
The HUD opportunity indices are access to Low Poverty areas; access to School Proficiency; characterization of the Labor Market Engagement; residence in relation to Jobs Proximity; Low Transportation Costs; Transit Trips Index; and a characterization of where you live by an Environmental Health indicator.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

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

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



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



# **D. DISPROPORTIONATE HOUSING NEEDS**

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

Overcrowding is defined as having from 1.1 to 1.5 people per room per residence, with severe overcrowding defined as having more than 1.5 people per room Households with overcrowding in Rome are shown in Table IV.23.A. In 2018, an estimated 0.6 percent of households were overcrowded, and an additional 0.5 percent were severely overcrowded. Households with overcrowding in Utica are shown in Table I.1.B. In 2018, an estimated 2.7 percent of households were overcrowded, and an additional 0.7 percent were severely overcrowded.

			Table IV.2 ding and Seve Rome 10 & 2018 Five-Ye	ere Overcrow	/ding		
	No Over	crowding	Overci	owding	Severe Ov	ercrow ding	
Data Source Hou	Households	% of Total	Households	% of Total	Households	% of Total	Total
			Owner		-		:
2010 Five-Year ACS	7,967	99.3%	54	0.7%	0	0%	8,021
2018 Five-Year ACS	7,024	99.3%	38	0.5%	9	0.1%	7,071
			Renter				
2010 Five-Year ACS	5,525	96.8%	128	2.2%	56	1.0%	5,709
2018 Five-Year ACS	5,456	98.3%	42	0.8%	53	1.0%	5,551
			Total				
2010 Five-Year ACS	13,492	98.3%	182	1.3%	56	0.4%	13,730
2018 Five-Year ACS	12,480	98.9%	80	0.6%	62	0.5%	12,622

			Table IV.2 ding and Seve Utica 10 & 2018 Five-Ye	ere Overcrow	rding					
Data Source	No Over	crowding	Overci	rowding	Severe Ov	ercrow ding	Total			
, Data Obaroo	Households	% of Total	Households	% of Total	Households	% of Total	lotal			
			Owner							
2010 Five-Year ACS	11,790	99.1%	77	0.6%	36	0.3%	11,903			
2018 Five-Year ACS	11,059	98.3%	127	1.1%	64	0.6%	11,250			
			Renter							
2010 Five-Year ACS	12,413	96.7%	359	2.8%	69	0.5%	12,841			
2018 Five-Year ACS	11,681	95.2%	497	4.1%	92	0.7%	12,270			
	Total									
2010 Five-Year ACS	24,203	97.8%	436	1.8%	105	0.4%	24,744			
2018 Five-Year ACS	22,740	96.7%	624	2.7%	156	0.7%	23,520			

Incomplete plumbing and kitchen facilities are another indicator of potential housing problems. According to the Census Bureau, a housing unit is classified as lacking complete plumbing facilities when any of the following are not present: piped hot and cold water, a flush toilet, and a bathtub or

shower. Likewise, a unit is categorized as deficient when any of the following are missing from the kitchen: a sink with piped hot and cold water, a range or cook top and oven, and a refrigerator.

In Rome, there were a total of 37 households with incomplete plumbing facilities in 2018, representing 0.3 percent of households in Rome. This is compared to 0.2 percent of households lacking complete plumbing facilities in 2010. In Utica, there were a total of 129 households with incomplete plumbing facilities in 2018, representing 0.5 percent of households in Utica. This is compared to 0.4 percent of households lacking complete plumbing facilities in 2018.

Table IV.24.A         Households with Incomplete Plumbing Facilities         Rome         2010 and 2018 Five-Year ACS Data									
Households	2010 Five-Year ACS	2018 Five-Year ACS							
With Complete Plumbing Facilities	13,702	12,585							
Lacking Complete Plumbing Facilities	28	37							
Total Households	Total Households 13,730 12,622								
Percent Lacking 0.2% 0.3%									

Table IV.24.BHouseholds with Incomplete Plumbing FacilitiesUtica2010 and 2018 Five-Year ACS Data								
Households	2010 Five-Year ACS	2018 Five-Year ACS						
With Complete Plumbing Facilities	24,655	23,391						
Lacking Complete Plumbing Facilities	89	129						
Total Households	Total Households 24,744 23,520							
Percent Lacking	0.4%	0.5%						

There were 86 households in Rome lacking complete kitchen facilities in 2018, compared to 13,730 households in 2010. This was a change from 0.3 percent of households in 2010 to 0.7 percent in 2018. There were 154 households in Utica lacking complete kitchen facilities in 2018, compared to 24,744 households in 2010. This was a change from 0.9 percent of households in 2010 to 0.7 percent in 2018.

Table IV.25.AHouseholds with Incomplete Kitchen FacilitiesRome2010 and 2018 Five-Year ACS Data								
Households	2010 Five-Year ACS	2018 Five-Year ACS						
With Complete Kitchen Facilities	13,685	12,536						
Lacking Complete Kitchen Facilities	45	86						
Total Households 13,730 12,622								
Percent Lacking	0.3%	0.7%						

Table IV.25.BHouseholds with Incomplete Kitchen Facilities Utica2010 and 2018 Five-Year ACS Data							
Households	2010 Five-Year ACS	2018 Five-Year ACS					
With Complete Kitchen Facilities	24,522	23,366					
Lacking Complete Kitchen Facilities	222	154					
Total Households         24,744         23,520           Percent Lacking         0.9%         0.7%							

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

In Rome 16.5 percent of households had a cost burden and 14.0 percent had a severe cost burden. Some 22.3 percent of renters were cost burdened, and 21.8 percent were severely cost burdened. Owner-occupied households without a mortgage had a cost burden rate of 8.7 percent and a severe cost burden rate of 7.1 percent. Owner occupied households with a mortgage had a cost burden rate of 13.9 percent, and severe cost burden at 8.5 percent.

		Co		Rom	Cost Burden	by Tenure	)			
	Less	Than 30%	31%-	50%	Abov e	50%	Not Con	nputed		
Data Source	House holds	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	Total	
				Owner With a	Mortgage					
2010 Five-Year ACS	3,473	75.3%	711	15.4%	426	9.2%	0	0%	4,610	
2018 Five-Year ACS	3,305	76.5%	602	13.9%	369	8.5%	45	1.0%	4,321	
			C	wner Without	a Mortgage					
2010 Five-Year ACS	2,685	78.7%	390	11.4%	325	9.5%	11	0.3%	3,411	
2018 Five-Year ACS	2,316	84.2%	239	8.7%	195	7.1%	0	0%	2,750	
				Rent	er					
2010 Five-Year ACS	3,275	57.4%	993	17.4%	1,152	20.2%	289	5.1%	5,709	
2018 Five-Year ACS	2,763	49.8%	1,237	22.3%	1,208	21.8%	343	6.2%	5,551	
Total										
2010 Five-Year ACS	9,433	68.7%	2,094	15.3%	1,903	13.9%	300	2.2%	13,730	
2018 Five-Year ACS	8,384	66.4%	2,078	16.5%	1,772	14.0%	388	3.1%	12,622	

		Co		Utic	Cost Burden	by Tenure	•		
	Less	Than 30%	31%-	50%	Abov e	50%	Not Con	nputed	
Data Source	House holds	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	Total
				Owner With a	Mortgage				
2010 Five-Year ACS	4,797	68.7%	1,305	18.7%	835	12.0%	47	0.7%	6,984
2018 Five-Year ACS	4,590	72.2%	1,163	18.3%	582	9.2%	19	0.3%	6,354
			C	wner Without	a Mortgage				
2010 Five-Year ACS	4,018	81.7%	533	10.8%	314	6.4%	54	1.1%	4,919
2018 Five-Year ACS	4,056	82.8%	437	8.9%	300	6.1%	103	2.1%	4,896
				Rent	er				
2010 Five-Year ACS	5,385	41.9%	2,627	20.5%	4,030	31.4%	799	6.2%	12,841
2018 Five-Year ACS	4,539	37.0%	2,899	23.6%	3,877	31.6%	955	7.8%	12,270
				Tota	1				
2010 Five-Year ACS	14,200	57.4%	4,465	18.0%	5,179	20.9%	900	3.6%	24,744
2018 Five-Year ACS	13,185	56.1%	4,499	19.1%	4,759	20.2%	1,077	4.6%	23,520

In Utica 19.1 percent of households had a cost burden and 20.2 percent had a severe cost burden. Some 23.6 percent of renters were cost burdened, and 31.6 percent were severely cost burdened. Owner-occupied households without a mortgage had a cost burden rate of 8.9 percent and a severe cost burden rate of 6.1 percent. Owner occupied households with a mortgage had a cost burden rate of 18.3 percent, and severe cost burden at 9.2 percent.

For owner occupied housing in Rome, elderly non-family households are most likely to be impacted by housing cost burdens, with 35.9 percent of these households having a cost burden or severe cost burden. For lower income owner households, elderly non-family households and large families are most likely to experience cost burdens. Some 94.3 percent of elderly non-family and 0 percent of large family households below 30 percent HAMFI face cost burdens or severe cost burdens. These data are shown in Table IV.27.A.

Table IV.27.A           Owner-Occupied Households by Income and Family Status and Cost Burden           Rome									
2012–2016 HUD CHAS Data									
Income	Elderly Family	Small Family	Large Family	Elderly Non-Family	Other Household	Total			
		No Cos	t Burden						
\$0 to \$21,120	4	10	0	0	0	14			
\$21,121 to \$35,200	40	4	0	60	4	108			
\$35,201 to \$56,320	205	150	15	250	135	755			
\$56,321 to \$70,400	215	300	70	80	150	815			
Above \$70,400	885	1,975	215	340	490	3,905			
Total	1,349	2,439	300	730	779	5,597			
		Cost I	Burden						
\$0 to \$21,120	0	10	0	25	10	45			
\$21,121 to \$35,200	35	65	35	105	35	275			
\$35,201 to \$56,320	40	170	10	45	90	355			
\$56,321 to \$70,400	60	35	0	10	10	115			
Above \$70,400	60	10	0	20	25	115			
Total	195	290	45	205	170	905			
		Severe C	ost Burden	l					
\$0 to \$21,120	35	65	0	140	65	305			
\$21,121 to \$35,200	15	25	0	50	45	135			
\$35,201 to \$56,320	15	15	0	20	35	85			
\$56,321 to \$70,400	4	0	0	0	4	8			
Above \$70,400	0	20	0	0	0	20			
Total	69	125	0	210	149	553			
		Тс	otal						
\$0 to \$21,120	39	89	0	175	100	403			
\$21,121 to \$35,200	90	94	35	215	84	518			
\$35,201 to \$56,320	260	335	25	315	260	1,195			
\$56,321 to \$70,400	279	335	70	90	164	938			
Above \$70,400	945	2,005	215	360	515	4,040			
Total	1,613	2,858	345	1,155	1,123	7,094			

For owner occupied housing in Utica, elderly non-family households are most likely to be impacted by housing cost burdens, with 32.6 percent of these households having a cost burden or severe cost burden. For lower income owner households, elderly non-family households and large families are most likely to experience cost burdens. Some 84.6 percent of elderly non-family and 57.1 percent of large family households below 30 percent HAMFI face cost burdens or severe cost burdens. These data are shown in Table IV.27.B

Table IV.27.B         Owner-Occupied Households by Income and Family Status and Cost Burden         Utica         2012–2016 HUD CHAS Data									
Income	Elderly Family	Small Family	Large Family	Elderly Non-Family	Other Household	Total			
		No Cos	t Burden						
\$0 to \$21,120	50	25	25	40	25	165			
\$21,121 to \$35,200	145	130	60	285	45	665			
\$35,201 to \$56,320	370	345	175	425	200	1,515			
\$56,321 to \$70,400	260	540	20	180	195	1,195			
Above \$70,400	955	2,265	400	570	840	5,030			
Total	1,780	3,305	680	1,500	1,305	8,570			
		Cost I	Burden						
\$0 to \$21,120	25	30	0	110	50	215			
\$21,121 to \$35,200	60	135	55	225	35	510			
\$35,201 to \$56,320	50	265	15	105	80	515			
\$56,321 to \$70,400	10	20	60	15	10	115			
Above \$70,400	10	80	0	15	10	115			
Total	155	530	130	470	185	1,470			
		Severe C	ost Burden	I					
\$0 to \$21,120	40	150	60	165	145	560			
\$21,121 to \$35,200	45	75	15	55	55	245			
\$35,201 to \$56,320	20	30	20	20	20	110			
\$56,321 to \$70,400	0	15	0	20	4	39			
Above \$70,400	0	0	4	0	0	4			
Total	105	270	99	260	224	958			
		Тс	otal						
\$0 to \$21,120	125	209	105	325	250	1,014			
\$21,121 to \$35,200	250	340	130	565	135	1,420			
\$35,201 to \$56,320	440	640	210	550	300	2,140			
\$56,321 to \$70,400	270	575	80	215	209	1,349			
Above \$70,400	965	2,345	404	585	850	5,149			
Total	2,050	4,109	929	2,240	1,744	11,072			

Renter households in Rome are impacted at a higher rate by cost burdens than owner households. Some 3,509 renter occupied households faced cost burdens, compared to 20.6 percent of owner occupied households. Of these, there are 214 renter households with incomes less than 30 percent HAMFI facing housing problems. This is also true in Utica, where some 5,610 renter occupied households faced cost burdens, compared to 21.9 percent of owner occupied households. Of these, there are 820 renter households with incomes less than 30 percent HAMFI facing housing problems.

Table IV.28.A           Renter-Occupied Households by Income and Family Status and Cost Burden           Rome           2012–2016 HUD CHAS Data									
Income	Elderly Family	Small Family	Large Family	Elderly Non-Family	Other Household	Total			
		No Co	ost Burden						
\$0 to \$21,120	4	0	0	100	110	214			
\$21,121 to \$35,200	0	150	20	105	140	415			
\$35,201 to \$56,320	30	340	45	200	290	905			
\$56,321 to \$70,400	45	110	25	100	215	495			
Above \$70,400	105	710	0	90	575	1,480			
Total	184	1,310	90	595	1,330	3,509			
		Cos	t Burden						
\$0 to \$21,120	45	35	10	65	135	290			
\$21,121 to \$35,200	40	240	20	50	50	400			
\$35,201 to \$56,320	30	130	10	115	180	465			
\$56,321 to \$70,400	0	20	10	0	0	30			
Above \$70,400	0	0	0	0	0	0			
Total	115	425	50	230	365	1,185			
		Severe	Cost Burde	en					
\$0 to \$21,120	15	320	75	275	325	1,010			
\$21,121 to \$35,200	10	50	0	80	15	155			
\$35,201 to \$56,320	0	0	0	10	30	40			
\$56,321 to \$70,400	0	0	0	0	0	0			
Above \$70,400	0	0	0	0	0	0			
Total	25	370	75	365	370	1,205			
			Total						
\$0 to \$21,120	64	380	105	450	620	1,619			
\$21,121 to \$35,200	50	440	40	235	205	970			
\$35,201 to \$56,320	60	470	55	325	500	1,410			
\$56,321 to \$70,400	45	130	35	100	215	525			
Above \$70,400	105	710	0	90	575	1,480			
Total	324	2,130	235	1,200	2,115	6,004			

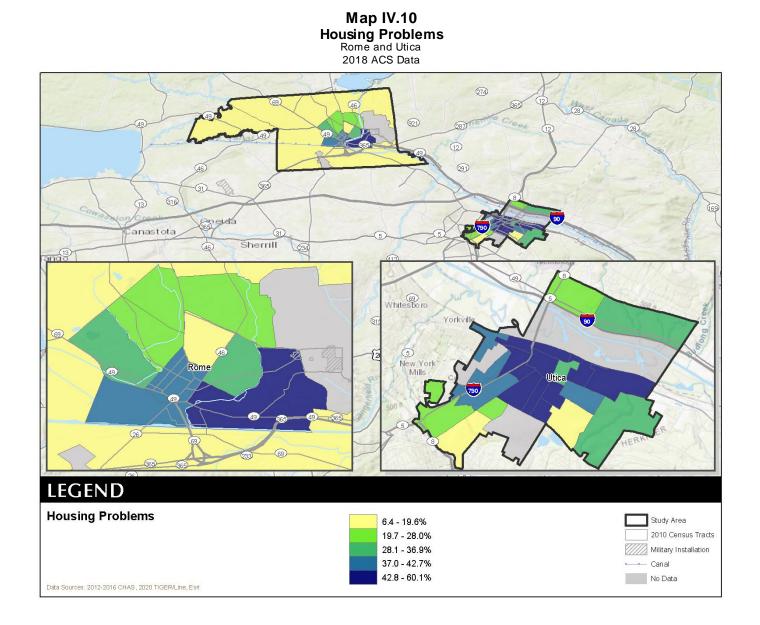
Table IV.28.B         Renter-Occupied Households by Income and Family Status and Cost Burden         Utica         2012–2016 HUD CHAS Data									
Income	Elderly Family	Small Family	Large Family	Elderly Non-Family	Other Household	Total			
		No Co	ost Burden						
\$0 to \$21,120	40	165	50	315	250	820			
\$21,121 to \$35,200	40	260	150	235	215	900			
\$35,201 to \$56,320	75	400	220	210	600	1,505			
\$56,321 to \$70,400	50	235	110	65	270	730			
Above \$70,400	170	730	60	95	600	1,655			
Total	375	1,790	590	920	1,935	5,610			
		Cos	t Burden						
\$0 to \$21,120	30	240	45	205	190	710			
\$21,121 to \$35,200	60	455	135	130	450	1,230			
\$35,201 to \$56,320	55	175	35	40	180	485			
\$56,321 to \$70,400	4	50	15	0	20	89			
Above \$70,400	10	4	0	30	0	44			
Total	159	924	230	405	840	2,558			
		Severe	Cost Burde	en					
\$0 to \$21,120	55	1,320	310	350	980	3,015			
\$21,121 to \$35,200	10	270	40	95	95	510			
\$35,201 to \$56,320	0	15	0	70	4	89			
\$56,321 to \$70,400	0	0	0	4	0	4			
Above \$70,400	0	0	0	30	0	30			
Total	65	1,605	350	549	1,079	3,648			
			Total						
\$0 to \$21,120	125	1,795	435	890	1,655	4,900			
\$21,121 to \$35,200	110	985	325	460	760	2,640			
\$35,201 to \$56,320	130	590	255	320	784	2,079			
\$56,321 to \$70,400	54	285	125	69	290	823			
Above \$70,400	180	734	60	155	600	1,729			
Total	599	4,389	1,200	1,894	4,089	12,171			

In total, some 2,084 households face cost burdens, and 1,763 face severe cost burdens in Rome. This includes 7,113 owner households and 5,998 renter households, as seen in Table IV.29.A. In Utica, some 4,035 households face cost burdens, and 4,623 face severe cost burdens. This includes 11,083 owner households and 12,174 renter households, as seen in Table IV.29.B.

Table IV.29.A         Households with Cost Burden by Tenure and Race         Rome											
2012–2016 HUD CHAS Data											
Race	No Cost Burden	Cost Burden	Severe Cost Burden	Not Computed	Total						
Owner-Occupied											
White	5,300	845	455	20	6,620						
Black	160	0	4	0	164						
Asian	65	25	20	0	110						
American Indian	0	0	4	0	4						
Pacific Islander	0	0	0	0	0						
Other Race	30	35	20	25	110						
Hispanic	45	0	60	0	105						
Total	5,600	905	563	45	7,113						
		Renter-Oc	cupied								
White	3,045	1,005	1,095	110	5,255						
Black	260	90	15	0	365						
Asian	30	25	10	0	65						
American Indian	4	4	0	0	8						
Pacific Islander	0	0	0	0	0						
Other Race	0	10	40	0	50						
Hispanic	170	45	40	0	255						
Total	3,509	1,179	1,200	110	5,998						
		Tota	I								
White	8,345	1,850	1,550	130	11,875						
Black	420	90	19	0	529						
Asian	95	50	30	0	175						
American Indian	4	4	4	0	12						
Pacific Islander	0	0	0	0	0						
Other Race	30	45	60	25	160						
Hispanic	215	45	100	0	360						
Total	9,109	2,084	1,763	155	13,111						

Table IV.29.BHouseholds with Cost Burden by Tenure and Race Utica										
		2012-2016 HUD	CHAS Data							
Race	No Cost Burden	Cost Burden	Severe Cost Burden	Not Computed	Total					
Ow ner-Occupied										
White	7,555	1,155	685	60	9,455					
Black	260	80	70	0	410					
Asian	415	115	95	0	625					
American Indian	4	0	4	0	8					
Pacific Islander	0	0	0	0	0					
Other Race	75	75	25	0	175					
Hispanic	265	45	90	10	410					
Total	8,574	1,470	969	70	11,083					
Renter-Occupied										
White	3,475	1,190	1,710	140	6,515					
Black	990	580	835	110	2,515					
Asian	360	275	350	0	985					
American Indian	20	20	10	0	50					
Pacific Islander	0	0	4	0	4					
Other Race	210	25	140	45	420					
Hispanic	550	475	605	55	1,685					
Total	5,605	2,565	3,654	350	12,174					
		Tota	I							
White	11,030	2,345	2,395	200	15,970					
Black	1,250	660	905	110	2,925					
Asian	775	390	445	0	1,610					
American Indian	24	20	14	0	58					
Pacific Islander	0	0	4	0	4					
Other Race	285	100	165	45	595					
Hispanic	815	520	695	65	2,095					
Total	14,179	4,035	4,623	420	23,257					

Housing problems tended to be higher in the central parts of both Cities. This corresponds with areas of higher rates of poverty and rental households. These areas also tend to correspond with higher rates of minority households, including Asian, black, and Hispanic populations.



# Housing Problems by Income

Very low-income renters are those who earn less than 50 percent of the area median income (AMI), and include a significant proportion of extremely low-income renters (who earn less than 30 percent of AMI). Households with worst case needs are defined as very low-income renters who do not receive government housing assistance and who pay more than 50 percent of their income for rent, live in severely inadequate conditions, or both. Table IV.30 shows the HUD calculated Median Family Income (MFI) for a family of four for Oneida County. As can be seen in 2019 the MFI was 70,400 dollars, which compared to 82,200 dollars for the State of New York. This is also shown in Diagram IV.13.

Table IV.30Median Family IncomeOneida County2000–2019 HUD MFI									
Year	MFI	State of New York MFI							
2000	40,100	56,100							
2001	40,500	58,400							
2002	42,500	61,800							
2003	47,600	57,400							
2004	49,200	59,700							
2005	51,400	60,100							
2006	52,600	61,500							
2007	52,400	61,500							
2008	52,700	64,200							
2009	55,800	67,900							
2010	56,400	68,500							
2011	58,000	70,400							
2012	58,800	71,400							
2013	63,800	70,000							
2014	59,500	69,500							
2015	63,000	72,000							
2016	59,600	72,300							
2017	62,100	73,400							
2018	65,000	77,800							
2019	70,400	82,200							

**Estimated Median Family Income** Oneida County vs. New York HUD Data: 2000 - 2019 Oneida County HUD Median Family Income Data 80,000 70,000 Median Family Income (\$) 60,000 50,000 40,000 30,000 20,000 10,000 0 2000 2001 2002 2003 2004 2005 2006 2007 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 2018 2019 Years State of New York **Oneida County** 

**Diagram IV.13** 

# Housing Problems by Race and Ethnicity

The following tables show households with housing problems by race/ethnicity for Rome and Utica. These tables can be used to determine if there is a disproportionate housing need for any racial or ethnic groups. If any racial/ethnic group faces housing problems at a rate of ten percentage points or high than the jurisdiction average, then they have a disproportionate share of housing problems. Housing problems are defined as any household that has overcrowding, inadequate kitchen or plumbing facilities, or are cost burdened (pay more than 30 percent of their income on housing). In Rome, 4 Black homeowner households face housing problems. In Utica, 170 Black homeowner households face housing problems. In Utica, 170 Black homeowner households face housing problems.

Pe	ercent of	Homeowne	r Household	Table IV.31.4 Is with Housin Rome -2016 HUD CHAS	n <mark>g Proble</mark> ms	s by Income	e and Race	
Income	White	Black	Non-Hisı Asian	panic by Race American Indian	Pacific Islander	Other Race	Hispanic (Any Race)	Total
			Wit	h Housing Proble	ms		·	
\$0 to \$21,120	89.2%	100.0%	100.0%	0%	0%	44.4%	100.0%	85.1%
\$21,121 to \$35,200	78.2%	0%	100.0%	100.0%	0%	0%	0%	79.0%
\$35,201 to \$56,320	34.3%	0%	100.0%	0%	0%	100.0%	100.0%	39.0%
\$56,321 to \$70,400	15.7%	0%	0%	0%	0%	0%	0%	15.3%
Above \$70,400	4.5%	0%	0%	0%	0%	0%	0%	4.2%
Total	20.7%	2.4%	47.6%	100.0%	0%	50.0%	54.5%	21.7%
			Witho	out Housing Prob	lems			
\$0 to \$21,120	4.6%	0%	0%	0%	0%	0%	0%	3.7%
\$21,121 to \$35,200	21.8%	0%	0%	0%	0%	0%	0%	21.0%
\$35,201 to \$56,320	65.7%	100.0%	0%	0%	0%	0%	0%	61.0%
\$56,321 to \$70,400	84.3%	100.0%	0%	0%	0%	0%	100.0%	84.7%
Above \$70,400	95.5%	100.0%	100.0%	0%	0%	100.0%	100.0%	95.8%
Total	79.0%	97.6%	52.4%	0%	0%	27.3%	45.5%	77.7%

P	ercent of	Homeowne		Table IV.31.E Is with Housin Utica		s by Income	e and Race	
			2012-	-2016 HUD CHAS	Data			
			Non-His	panic by Race			Hispanic (Any	
Income	White	Black	Asian	American Indian	Pacific Islander	Other Race	Race)	Total
			Wit	h Housing Proble	ms			
\$0 to \$21,120	78.9%	100.0%	81.0%	100.0%	0%	0%	66.7%	79.6%
\$21,121 to \$35,200	52.4%	81.8%	57.9%	0%	0%	100.0%	41.2%	54.7%
\$35,201 to \$56,320	27.1%	42.9%	56.8%	0%	0%	93.2%	0%	31.0%
\$56,321 to \$70,400	10.0%	28.6%	0%	100.0%	0%	0%	75.0%	12.1%
Above \$70,400	3.3%	13.2%	14.3%	0%	0%	0%	18.5%	4.5%
Total	20.6%	41.5%	43.7%	66.7%	0%	55.9%	34.1%	23.8%
			Witho	out Housing Prob	lems			
\$0 to \$21,120	13.2%	0%	19.0%	0%	0%	0%	20.0%	13.4%
\$21,121 to \$35,200	47.6%	18.2%	42.1%	0%	0%	0%	58.8%	45.3%
\$35,201 to \$56,320	72.9%	57.1%	43.2%	100.0%	0%	6.8%	100.0%	69.0%
\$56,321 to \$70,400	90.0%	71.4%	100.0%	0%	0%	100.0%	25.0%	87.9%
Above \$70,400	96.7%	86.8%	85.7%	0%	0%	100.0%	81.5%	95.5%
Total	<b>78.8</b> %	58.5%	56.3%	33.3%	0%	<b>44.1</b> %	63.4%	75.6%

In total, some 2,553 households face housing problems in Rome. Of these, some 99 black households, 35 Asian households, and 85 Hispanic renter households face housing problems. In total, some 6,490 households face housing problems in Utica. Of these, some 1,504 black households, 680 Asian households, and 1,120 Hispanic renter households face housing problems. Overall, there are 4,096 households with housing problems in Rome. This includes 103 black households, 85 Asian households, 8 American Indian, 0 Pacific Islander, and 105 "other" race households with housing problems. As for ethnicity, there are 145 Hispanic households with housing problems. This is shown in Table IV.32.A.

Т	otal Hous	eholds w	ith Housi	e IV.32.A ng Problem Rome HUD CHAS D		ne and R	ace	
Income	White	Black	Non-Hisp Asian	anic by Race American Indian	Pacific Islander	Other Race	Hispanic (Any Race)	Total
			With Hou	ising Problems	5			
\$0 to \$21,120	1,460	54	20	4	0	45	85	1,668
\$21,121 to \$35,200	905	4	25	4	0	25	0	963
\$35,201 to \$56,320	840	45	40	0	0	35	50	1,010
\$56,321 to \$70,400	230	0	0	0	0	0	10	240
Above \$70,400	215	0	0	0	0	0	0	215
Total	3,650	103	85	8	0	105	145	4,096
				Total				
\$0 to \$21,120	1,765	64	30	8	0	70	85	2,022
\$21,121 to \$35,200	1,400	39	25	4	0	25	0	1,493
\$35,201 to \$56,320	2,305	105	44	0	0	35	120	2,609
\$56,321 to \$70,400	1,395	25	0	0	0	0	50	1,470
Above \$70,400	5,010	290	70	0	0	30	115	5,515
Total	11,875	523	169	12	0	160	370	13,109

There are 9,128 households with housing problems in Utica. This includes 1,674 black households, 955 Asian households, 36 American Indian, 4 Pacific Islander, and 294 "other" race households with housing problems. As for ethnicity, there are 1,260 Hispanic households with housing problems. This is shown in Table IV.32.B.

То	otal Hous	eholds w	ith Housi	e IV.32.B ng Problem Utica HUD CHAS Da		ne and R	ace	
Income	White	Black	Non-Hisp Asian	anic by Race American Indian	Pacific Islander	Other Race	Hispanic (Any Race)	Total
			With Hou	sing Problems	5		<u>.</u>	
\$0 to \$21,120	2,290	925	560	24	4	145	625	4,573
\$21,121 to \$35,200	1,405	475	150	4	0	60	495	2,589
\$35,201 to \$56,320	785	220	190	4	0	55	70	1,324
\$56,321 to \$70,400	175	25	25	4	0	30	45	304
Above \$70,400	250	29	30	0	0	4	25	338
Total	4,905	1,674	955	36	4	294	1,260	9,128
				Total				
\$0 to \$21,120	3,095	1,130	600	28	4	225	805	5,887
\$21,121 to \$35,200	2,330	695	250	8	0	95	685	4,063
\$35,201 to \$56,320	3,040	505	340	18	0	84	250	4,237
\$56,321 to \$70,400	1,600	205	160	4	0	80	135	2,184
Above \$70,400	5,900	399	265	0	0	109	215	6,888
Total	15,965	2,934	1,615	58	4	593	2,090	23,259

These racial/ethnic groups were also disproportionately impacted by severe housing problems, as seen in Table IV.33.A. Severe housing problems include overcrowding at a rate of more than 1.5 persons per room and housing costs exceeding 50 percent of the household income. Some 19 black homeowner households face severe housing problems, as well as 34 Asian homeowner households, and 60 Hispanic homeowner households in Rome. In Utica, some 1,019 black homeowner households face severe housing problems, as well as 625 Asian homeowner households, and 95 Hispanic homeowner households.

			Tak	ole IV.33.A						
Percent of Ho	omeown	er House	holds with	Severe Ho	using Prob	olems by li	ncome and	Race		
			0040.00	Rome						
				16 HUD CHAS			Hispania			
Income			NON-HIS	panic by Race American	Pacific	Other	Hispanic (Any	Total		
income	White	Black	Asian	Indian	Islander	Race	Race)	Iotai		
With A Severe Housing Problem										
\$0 to \$21,120	76.9%	100.0%	100.0%	0%	0%	44.4%	100.0%	75.2%		
\$21,121 to \$35,200	26.5%	0%	0%	100.0%	0%	0%	0%	26.3%		
\$35,201 to \$56,320	5.1%	0%	28.6%	0%	0%	0%	100.0%	9.1%		
\$56,321 to \$70,400	3.2%	0%	0%	0%	0%	0%	0%	3.2%		
Above \$70,400	1.5%	0%	0%	0%	0%	0%	0%	1.4%		
Total	<b>7.9</b> %	2.4	<b>23.1</b> %	100.0%	0%	<b>18.2</b> %	54.5%	9.0%		
		<u>ا</u>	Without A Sev	ere Housing I	Problems					
\$0 to \$21,120	16.9%	0%	0%	0%	0%	0%	0%	13.6%		
\$21,121 to \$35,200	73.5%	0%	100.0%	0%	0%	0%	0%	73.7%		
\$35,201 to \$56,320	94.9%	100.0%	71.4%	0%	0%	100.0%	0%	90.9%		
\$56,321 to \$70,400	96.8%	100.0%	0%	0%	0%	0%	100.0%	96.8%		
Above \$70,400	98.5%	100.0%	100.0%	0%	0%	100.0%	100.0%	98.6%		
Total	<b>91.8</b> %	<b>97.6</b> %	76.9%	0%	0%	<b>59.1</b> %	45.5%	90.4%		

Rome and Utica Analysis of Impediments

				le IV.33.B	aina Drahl	k l		
Percent of Ho	meowne	er Housen		Utica 0 HUD CHAS D		ems by in	come and r	kace
		Hispanic						
Income	White	Black	Asian	American Indian	Pacific Islander	Other Race	(Any Race)	Total
			With A Seve	re Housing Pro	oblem			
\$0 to \$21,120	57.5%	81.8%	61.9%	100.0%	0%	0%	40.0%	58.2%
\$21,121 to \$35,200	16.2%	40.0%	42.1%	0%	0%	33.3%	41.2%	20.8%
\$35,201 to \$56,320	5.1%	0%	29.7%	0%	0%	7.4%	0%	6.9%
\$56,321 to \$70,400	1.2%	0%	0%	100.0%	0%	0%	75.0%	3.6%
Above \$70,400	1.6%	10.8%	9.5%	0%	0%	0%	0%	2.2%
Total	<b>8.5</b> %	21.2	<b>28.6</b> %	66.7%	0%	<b>10.9</b> %	23.2%	10.8%
		W	ithout A Sev	ere Housing P	roblems			
\$0 to \$21,120	34.6%	18.2%	38.1%	0%	0%	0%	46.7%	34.9%
\$21,121 to \$35,200	83.8%	60.0%	57.9%	0%	0%	66.7%	58.8%	79.2%
\$35,201 to \$56,320	94.9%	100.0%	70.3%	100.0%	0%	92.6%	100.0%	93.1%
\$56,321 to \$70,400	98.8%	100.0%	100.0%	0%	0%	100.0%	25.0%	96.4%
Above \$70,400	98.4%	89.2%	90.5%	0%	0%	100.0%	100.0%	97.8%
Total	<b>90.9</b> %	78.8%	71.4%	33.3%	0%	89.1%	74.4%	88.6%

As seen in Table IV.34, the most common housing problem tends to be housing cost burdens. More than 2,015 households in Rome have a cost burden and 1,710 have a severe cost burden. Some 1,110 renter households are impacted by cost burdens, and 1,140 are impacted by severe cost burdens. On the other hand, some 905 owner-occupied households have cost burdens, and 570 have severe cost burdens. In Utica, more than 3,885 households have a cost burden and 4,458 have a severe cost burden. Some 2,450 renter households are impacted by cost burdens, and 3,499 are impacted by severe cost burdens. On the other hand, some 1,435 owner-occupied households have cost burdens, and 3,499 are impacted by severe cost burdens.

		ble IV.34.A				
Housi	ng Probler	ns by Incom	ie and Teni	ire		
	2012–2	Rome 016 HUD CHAS	Data			
Housing Problem	\$0 to \$21,120	\$21,121 to \$35,200	\$35,201 to \$56,320	\$56,321 to \$70,400	Above \$70,400	Total
	0	wner-Occupied		. ,	. ,	
Lacking complete plumbing or kitchen facilities	0	0	15	15	0	30
Severely Overcrowded with > 1.51 people per	0	0	4	0	4	8
room (and complete kitchen and plumbing)	U	U	4	U	4	0
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	0	0	0	0	35	35
Housing cost burden greater that 50% of income						
(and none of the above problems)	305	140	90	15	20	570
Housing cost burden greater than 30% of income	40	275	360	115	115	905
(and none of the above problems)	40	215	500	115	115	303
Zero/negative income (and none of the above problems)	45	0	0	0	0	45
has none of the 4 housing problems	15	110	735	800	3,865	5,525
Total	405	525	1,204	945	4,039	7,118
		enter-Occupied	1,204	545	4,000	7,110
_acking complete plumbing or kitchen facilities	70		15	0	15	100
Severely Overcrowded with > 1.51 people per		-		•		
room (and complete kitchen and plumbing)	15	15	15	10	30	85
Overcrowded - With 1.01-1.5 people per room	35	0	4	75	0	114
(and none of the above problems)	55	U	-	75	U	114
Housing cost burden greater that 50% of income (and none of the above problems)	950	155	35	0	0	1,140
Housing cost burden greater than 30% of income						
(and none of the above problems)	255	380	465	10	0	1,110
Zero/negative income (and none of the above	75	0	0	0	0	75
problems)				-	-	
has none of the 4 housing problems	215	420	865	430	1,435	3,365
Total	1,615	970	1,399	525	1,480	5,989
		Total				
_acking complete plumbing or kitchen facilities	70	0	30	15	15	130
Severely Overcrowded with > 1.51 people per room (and complete kitchen and plumbing)	15	15	19	10	34	93
Overcrowded - With 1.01-1.5 people per room						
(and none of the above problems)	35	0	4	75	35	149
Housing cost burden greater that 50% of income	1,255	295	125	15	20	1,710
(and none of the above problems)	1,200	233	125	10	20	1,710
Housing cost burden greater than 30% of income and none of the above problems)	295	655	825	125	115	2,015
Zero/negative income (and none of the above						
problems)	120	0	0	0	0	120
has none of the 4 housing problems	230	530	1,600	1,230	5,300	8,890
Total	2,020	1,495	2,603	1,470	5,519	13,107

		able IV.34.B				
Housi	ng Proble	ms by Incom	ie and Teni	ıre		
	2012–2	Utica 016 HUD CHAS	Data			
Housing Problem	\$0 to \$21,120	\$21,121 to \$35,200	\$35,201 to \$56,320	\$56,321 to \$70,400	Above \$70,400	Total
	0	wner-Occupied				
Lacking complete plumbing or kitchen facilities	30	0	4	4	30	68
Severely Overcrowded with > 1.51 people per	0	25	10	0	0	35
room (and complete kitchen and plumbing) Overcrowded - With 1.01-1.5 people per room	Ū			Ū	Ū	
(and none of the above problems)	0	25	35	0	85	145
Housing cost burden greater that 50% of income	500	245	110	40		050
(and none of the above problems)	560	245	110	40	4	959
Housing cost burden greater than 30% of income	215	485	510	115	110	1,435
(and none of the above problems) Zero/negative income (and none of the above						
problems)	70	0	0	0	0	70
has none of the 4 housing problems	135	640	1,480	1,190	4,920	8,365
Total	1,010	1,420	2,149	1,349	5,149	11,077
		enter-Occupied	, -	,	-, -	,-
Lacking complete plumbing or kitchen facilities	35	25	10	0	15	85
Severely Overcrowded with > 1.51 people per	20	30	15	0	15	80
room (and complete kitchen and plumbing)	20	30	15	U	15	80
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	175	85	75	45	4	384
Housing cost burden greater that 50% of income						
(and none of the above problems)	2,890	480	95	4	30	3,499
Housing cost burden greater than 30% of income	660	1,195	460	90	45	2 450
(and none of the above problems)	000	1,195	400	90	40	2,450
Zero/negative income (and none of the above problems)	320	0	0	0	0	320
has none of the 4 housing problems	795	825	1,430	685	1,620	5,355
Total	4,895	2,640	2,085	824	1,729	12,173
	4,095	Total	2,005	024	1,729	12,175
Lacking complete plumbing or kitchen facilities	65	25	14	4	45	153
Severely Overcrowded with > 1.51 people per						
room (and complete kitchen and plumbing)	20	55	25	0	15	115
Overcrowded - With 1.01-1.5 people per room	175	110	110	45	89	529
(and none of the above problems)	175	110	110	45	03	525
Housing cost burden greater that 50% of income (and none of the above problems)	3,450	725	205	44	34	4,458
Housing cost burden greater than 30% of income						
(and none of the above problems)	875	1,680	970	205	155	3,885
Zero/negative income (and none of the above	390	0	0	0	0	390
problems)		-	-	•	•	
has none of the 4 housing problems	930	1,465	2,910	1,875	6,540	13,720
Total	5,905	4,060	4,234	2,173	6,878	23,250

# **Elderly Housing Needs**

Table IV.35 shows the rate of housing problems for elderly households. Some 1,020 elderly and 510 extra-elderly households in Rome have housing problems. Of these, some 445 elderly households with housing problems have incomes less than 30 percent HAMFI, and 180 extra-elderly households have incomes below 30 percent HAMFI. In Utica, some 1,510 elderly and 975 extra-elderly households have housing problems. Of these, some 740 elderly households with housing problems have incomes less than 30 percent HAMFI, and 340 extra-elderly households have incomes less than 30 percent HAMFI, and 340 extra-elderly households have incomes less than 30 percent HAMFI.

# Table IV.35.A Households with Housing Problems by Income and Elderly Status Rome 2012–2016 HUD CHAS Data

2012–2016 HUD CHAS Data										
Income	Elderly	Extra-Elderly	Non-Elderly	Total						
	With House	sing Problems								
\$0 to \$21,120	445	180	1,050	1,675						
\$21,121 to \$35,200	250	155	560	965						
\$35,201 to \$56,320	155	140	715	1,010						
\$56,321 to \$70,400	to \$70,400 65 25 155									
Above \$70,400	105	10	105	220						
Total	1,020	510	2,585	4,115						
Without Housing Problems										
\$0 to \$21,120	64	45	120	229						
\$21,121 to \$35,200	100	105	325	530						
\$35,201 to \$56,320	300	380	920	1,600						
\$56,321 to \$70,400	240	210	775	1,225						
Above \$70,400	1,320	465	3,520	5,305						
Total	2,024	1,205	5,660	8,889						
	Not (	Computed								
\$0 to \$21,120	20	0	95	115						
\$21,121 to \$35,200	0	0	0	0						
\$35,201 to \$56,320	0	0	0	0						
\$56,321 to \$70,400	0	0	0	0						
Above \$70,400	0	0	0	0						
Total	20	0	95	115						
		Total								
\$0 to \$21,120	529	225	1,265	2,019						
\$21,121 to \$35,200	350	260	885	1,495						
\$35,201 to \$56,320	455	520	1,635	2,610						
\$56,321 to \$70,400	305	235	930	1,470						
Above \$70,400	1,425	475	3,625	5,525						
Total	3,064	1,715	8,340	13,119						

# Table IV.35.B Households with Housing Problems by Income and Elderly Status Utica 2012–2016 HUD CHAS Data

2012–2016 HUD CHAS Data										
Income	Elderly	Extra-Elderly	Non-Elderly	Total						
	With House	sing Problems								
\$0 to \$21,120	740	340	3,495	4,575						
\$21,121 to \$35,200	485	315	1,795	2,595						
\$35,201 to \$56,320	190	205	920	1,315						
\$56,321 to \$70,400	1 to \$70,400 60 25 220									
Above \$70,400	35	90	220	345						
Total	1,510	975	6,650	9,135						
Without Housing Problems										
\$0 to \$21,120	240	195	500	935						
\$21,121 to \$35,200	315	400	750	1,465						
\$35,201 to \$56,320	615	590	1,705	2,910						
\$56,321 to \$70,400	430	260	1,185	1,875						
Above \$70,400	1,800	500	4,240	6,540						
Total	3,400	1,945	8,380	13,725						
	Not C	Computed								
\$0 to \$21,120	30	10	355	395						
\$21,121 to \$35,200	0	0	0	0						
\$35,201 to \$56,320	0	0	0	0						
\$56,321 to \$70,400	0	0	0	0						
Above \$70,400	0	0	0	0						
Total	30	10	355	395						
		Total								
\$0 to \$21,120	1,010	545	4,350	5,905						
\$21,121 to \$35,200	800	715	2,545	4,060						
\$35,201 to \$56,320	805	795	2,625	4,225						
\$56,321 to \$70,400	490	285	1,405	2,180						
Above \$70,400	1,835	590	4,460	6,885						
Total	4,940	2,930	15,385	23,255						

# ACCESS TO MORTGAGE FINANCE SERVICES

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

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

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

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

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

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

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

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

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

Rome and Utica Analysis of Impediments

Table IV.36.A shows the purpose of loan by year for Rome from 2008 to 2018. As seen therein, there were over 9,556 loans during this time period, of these some 3,925 were for home purchases. In 2018, there were 680 loans, of which 339 were for home purchases. As seen in Table IV.36.B, there were 14,092 loans in Utica between 2008 and 2018. In 2018, there were 1,057 loans, of which 536 were for home purchases.

				•	Table I se of Loa Rome ci 8–2018 HM	an by Ye	ear							
Purpose	2008–2018 HMDA Data 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 2018 To													
Home Purchase	383	332	278	296	411	357	328	356	405	440	339	3,925		
Home Improvement	314	163	123	104	145	137	129	151	144	187	51	1,648		
Refinancing	483	452	382	336	442	423	283	296	307	289	221	3,914		
Total	1,180	947	783	736	998	917	740	803	856	916	680	9,556		

Table IV.36.B         Purpose of Loan by Year         Utica city         2008–2018 HMDA Data													
Purpose	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total	
Home Purchase	546	450	408	378	446	566	559	560	642	661	536	5,752	
Home Improvement	476	250	221	195	260	295	204	259	289	348	111	2,908	
Refinancing	677	602	475	522	525	546	372	405	462	436	257	5,279	
Total	1,699	1,302	1,104	1,095	1,231	1,407	1,135	1,224	1,393	1,445	1,057	14,092	

Tables IV.37.A and IV.37.B show the occupancy status for loan applicants. A vast majority of applicants were or owner-occupied units, accounting for 95.8 percent in Rome and 93.9 percent in Utica between 2008 and 2018, and for 94.0 percent and 92.9 percent, respectively, in 2018 alone.

			Oc	cupancy	Table I Status f Rome ci	or Appli	cations					
				200	)8–2018 HN	IDA Data						
Status	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
Owner-Occupied	1,125	924	763	705	970	885	699	748	822	879	639	9,159
Not Owner-Occupied	54	19	20	31	26	32	38	54	33	37	7	351
Not Applicable	1	4	0	0	2	0	3	1	1	0	34	46
Total	1,180	947	783	736	998	917	740	803	856	916	680	9,556

			Oc	cupancy	Table ' Status f	or Appli	cations							
	Utica city 2008–2018 HMDA Data													
Status         2008         2009         2011         2012         2013         2014         2015         2016         2017         2018         Total														
Owner-Occupied	1,604	1,248	1,048	1,040	1,167	1,319	1,059	1,115	1,300	1,348	982	13,230		
Not Owner-Occupied	92	50	56	50	63	86	76	108	92	92	9	774		
Not Applicable	3	4	0	5	1	2	0	1	1	5	66	88		
Total	1,699	1,302	1,104	1,095	1,231	1,407	1,135	1,224	1,393	1,445	1,057	14,092		

Owner-occupied home purchase loan applications by loan types are shown in Table IV.38.A. Between 2008 and 2018 in Rome, some 29.9 percent of home loan purchases were conventional loans, 57.0 percent were FHA insured, and 12.8 percent were VA Guaranteed. In Utica, some 36.8 percent of home loan purchases were conventional loans, 59.7 percent were FHA insured, and 3.5 percent were VA Guaranteed.

					Table I	V.38.A									
	Owne	er-Occup	oied Ho	me Pur	chase L	oan Apr	olicatior	s by Lo	an Type						
					Rome ci			,, <u>,</u>							
				2008	3–2018 HN	IDA Data									
Loan Type															
Conventional	128	95	55	64	89	107	102	87	132	133	133	1,125			
FHA - Insured	190	197	188	185	260	194	158	186	202	229	152	2,141			
VA - Guaranteed	40	34	27	29	39	42	44	50	53	59	41	458			
Rural Housing Service or Farm Service Agency	0	0	2	1	9	4	3	5	5	3	1	33			
Total	358	326	272	279	397	347	307	328	392	424	327	3,757			
					Table I	V.39.B									
	Owne	er-Occup	bied Ho				olicatior	s by Lo	an Type						
					Utica ci										
				2008	3–2018 HN										
Loan Type	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total			
Conventional	249	162	123	104	109	163	200	157	224	245	228	1,964			
FHA - Insured	245	258	245	238	297	346	313	311	335	345	249	3,182			
VA - Guaranteed	8	11	8	13	15	19	17	29	36	19	12	187			
Rural Housing Service or Farm Service Agency	0	0	0	0	0	0	0	1	0	0	0	1			
Total	502	431	376	355	421	528	530	498	595	609	489	5,334			

# Denial Rates

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

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

As shown in Table IV.40.A, just over 2,084 home purchase loan applications were originated in Rome over the 2008-2018 period, and 301 were denied. In Utica, as shown in Table IV.40.B, some 3,095 loans were originated, and 541 were denied.

		Loa	n Applio	cations Rome		on Tak	en							
Action 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 2018 Total														
Loan Originated	204	168	122	154	206	181	162	186	229	257	215	2,084		
Application Approved but not Accepted 5 3 3 3 6 2 4 5 7 5 6 49												49		
Application Denied	32	11	20	15	23	24	31	31	49	35	30	301		
Application Withdrawn by Applicant	14	13	8	10	13	13	5	5	19	26	28	154		
File Closed for Incompleteness	4	0	1	4	2	2	3	6	3	1	6	32		
Loan Purchased by the Institution	99	129	118	93	147	125	102	95	85	100	42	1,135		
Preapproval Request Denied	0	2	0	0	0	0	0	0	0	0	0	2		
Preapproval Approved but not Accepted														
Total	358	326	272	279	397	347	307	328	392	424	327	3,757		

		Loa	n Appli 200	cations Utica		on Tak	en							
Action 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 2018 Total														
Loan Originated	296	256	234	189	221	279	319	294	338	354	315	3,095		
Application Approved but not Accepted	13	7	7	9	11	9	13	10	13	10	14	116		
Application Denied	58	40	31	47	46	51	47	39	65	56	61	541		
Application Withdrawn by Applicant	27	21	13	21	20	21	19	30	20	29	23	244		
File Closed for Incompleteness	16	5	1	7	2	7	6	8	10	4	7	73		
Loan Purchased by the Institution	92	96	90	82	121	161	126	117	149	156	69	1,259		
Preapproval Request Denied	0	6	0	0	0	0	0	0	0	0	0	6		
Preapproval Approved but not Accepted														
Total	502	431	376	355	421	528	530	498	595	609	489	5,334		

The most common reasons cited in the decision to deny one of these loan applications related to the debt-to-income ratio of the prospective homeowner, as shown in Tables IV.41.A and IV.41.B. Credit history and collateral were also commonly given as reasons to deny home purchase loans.

		Loa		cations Ro	<b>ble IV.4</b> by Rea me city 18 HMDA	son for	Denial							
Denial Reason 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 2018 Total														
Debt-to-Income Ratio         4         1         3         3         6         6         10         7         11         10         9         70														
Employment History	0	0	0	0	0	0	2	0	0	2	1	5		
Credit History         5         0         3         2         4         5         4         5         2         5         4         39														
Solution       Solutity and a solidity andiff and a solution       Solution </td														
Insufficient Cash	0	2	0	1	1	2	1	3	1	0	1	12		
Unverifiable Information	0	1	0	2	0	1	1	2	1	0	2	10		
Credit Application Incomplete	1	0	0	1	1	0	2	4	16	5	3	33		
Mortgage Insurance Denied	0	0	0	0	0	0	0	0	0	0	0	0		
Other	4	0	2	1	3	3	4	2	3	2	8	32		
Missing	15	5	7	4	6	6	5	6	5	4	0	63		
Total	32	11	20	15	23	24	31	31	49	35	30	301		

		Loa	n Appli	cations	<b>ble IV.4</b> <b>by Rea</b> ica city 18 HMDA	son for	Denial							
Denial Reason 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 2018 Total														
Debt-to-Income Ratio         3         7         6         9         7         15         10         5         15         12         21         110														
Employment History	3	1	2	2	1	1	1	2	2	1	1	17		
Credit History	10	12	5	8	7	8	4	13	7	5	2	81		
Collateral	6	8	3	5	3	10	7	8	12	9	5	76		
Insufficient Cash	6	2	1	1	2	2	3	1	2	6	1	27		
Unverifiable Information	7	3	2	0	4	0	2	1	1	2	3	25		
Credit Application Incomplete	3	3	0	4	3	2	3	2	13	4	9	46		
Mortgage Insurance Denied	0	0	0	1	0	0	1	0	0	0	0	2		
Other	4	3	1	7	5	6	3	3	10	6	19	67		
Missing	16	1	11	10	14	7	13	4	3	11	0	90		
Total	58	40	31	47	46	51	47	39	65	56	61	541		

Denial rates were observed to differ by race and ethnicity, as shown in Table IV.42.A. While white applicants had a denial rate of 11.7 in Rome over the period from 2008 through 2018, black applicants had a denial rate of 22.0 percent. However, these represent a small number of applicants, only 46 applicants over this entire period. In Utica, a similar pattern is present. Over the course of 2008 to 2018, the average denial rate for white applicants in Utica was 12.3 percent and 23.8 percent for black applicants. Hispanic applicants also tended to have a higher denial rate than Non-Hispanic applicants, at 32.0 percent versus 13.3 percent, respectively.

			Deni	al Rate	s by Rac <sub>Ror</sub>	<b>le IV.42</b> e/Ethnici <sup>me city</sup> 7 HMDA Da	ty of App	olicant							
Race/Ethnicity	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Average			
American Indian	%	%	%	%	%	%	%	%	%	%	%	%			
Asian	0.0%	%	0.0%	%	%	0.0%	0.0%	50.0%	0.0%	0.0%	0.0%	6.2%			
Black															
Pacific Islander	%	%	%	%	%	%	0.0%	0.0%	%	0.0%	0.0%	0.0%			
White	12.3%	6.4%	13.3%	9.3%	8.4%	10.4%	16.8%	12.0%	16.4%	10.6%	11.4%	11.7%			
Not Available	71.4%	0.0%	0.0%	0.0%	36.4%	33.3%	14.3%	33.3%	31.2%	31.2%	14.3%	25.8%			
Not Applicable	%	%	%	%	%	%	%	%	%	%	%	%			
Average	13.6%	6.1%	14.1%	8.9%	10.0%	11.7%	16.1%	14.3%	17.6%	12.0%	12.2%	12.6%			
Hispanic	20.0%	0.0%	0.0%	0.0%	0.0%	0.0%	60.0%	0.0%	33.3%	25.0%	20.0%	18.8%			
Non-Hispanic	11.9%	6.4%	15.0%	9.4%	8.7%	11.2%	13.6%	14.1%	16.8%	10.4%	11.7%	11.8%			

	Table IV.42.B         Denial Rates by Race/Ethnicity of Applicant         Utica city         2004–2017 HMDA Data														
Race/Ethnicity 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 2018 Aver															
American Indian	%	%	0.0%	100.0%	%	%	%	%	50.0%	100.0%	0.0%	50.0%			
Asian															
Black															
Pacific Islander	0.0%	100.0%	0.0%	%	50.0%	%	33.3%	%	%	0.0%	100.0%	40.0%			
White	14.0%	10.1%	10.1%	14.4%	12.6%	11.6%	11.7%	10.3%	14.2%	10.3%	15.8%	12.3%			
Not Available	50.0%	33.3%	18.8%	50.0%	37.5%	23.3%	20.0%	26.7%	23.8%	25.0%	29.6%	30.3%			
Not Applicable	%	%	%	%	%	%	%	%	%	%	%	%			
Average	16.4%	13.5%	11.7%	19.9%	17.2%	15.5%	12.8%	11.7%	16.1%	13.7%	16.2%	14.9%			
Hispanic	35.3%	18.8%	16.7%	75.0%	38.5%	46.2%	20.0%	41.7%	20.0%	27.6%	32.0%	32.0%			
Non-Hispanic	14.6%	12.2%	11.1%	17.1%	14.6%	13.5%	12.3%	9.8%	15.5%	12.2%	13.8%	13.3%			

# **Predatory Lending**

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

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

Home loans are designated as "high-annual percentage rate" loans (HALs) where the annual percentage rate on the loan exceeds that of a comparable treasury instruments by at least three percentage points. As shown in Table IV.43.A, only 40 loans between 2008 and 2018 were HALs in Rome, accounting for 1.9 percent. The highest rate of HAL loans was seen in 2008, at 13.7 percent, which fell to 0.0 percent by 2010. In Utica, there were 57 HALs between 2008 and 2018, at a rate of 1.8 percent. The highest rate of HALs was seen in 2008, at 12.5 percent.

		O	riginate		er-Occi Ro	me city	oans by	/ HAL S	itatus					
Loan Type	2008–2018 HMDA Data Loan Type 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 2018 Total													
HAL	28	10	0	0	0	0	0	1	1	0	0	40		
Other	176	158	122	154	206	181	162	185	228	257	215	2044		
Total	204	168	122	154	206	181	162	186	229	257	215	2,084		
Percent HAL	13.7%	6.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.5%	0.4%	0.0%	0.0%	1.9%		

Table IV.43.B         Originated Owner-Occupied Loans by HAL Status         Utica city         2008–2018 HMDA Data												
Loan Type	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
HAL	37	15	0	0	1	0	0	0	1	1	2	57
Other	259	241	234	189	220	279	319	294	337	353	313	3038
Total	296	256	234	189	221	279	319	294	338	354	315	3,095
Percent HAL	12.5%	5.9%	0.0%	0.0%	0.5%	0.0%	0.0%	0.0%	0.3%	0.3%	0.6%	1.8%

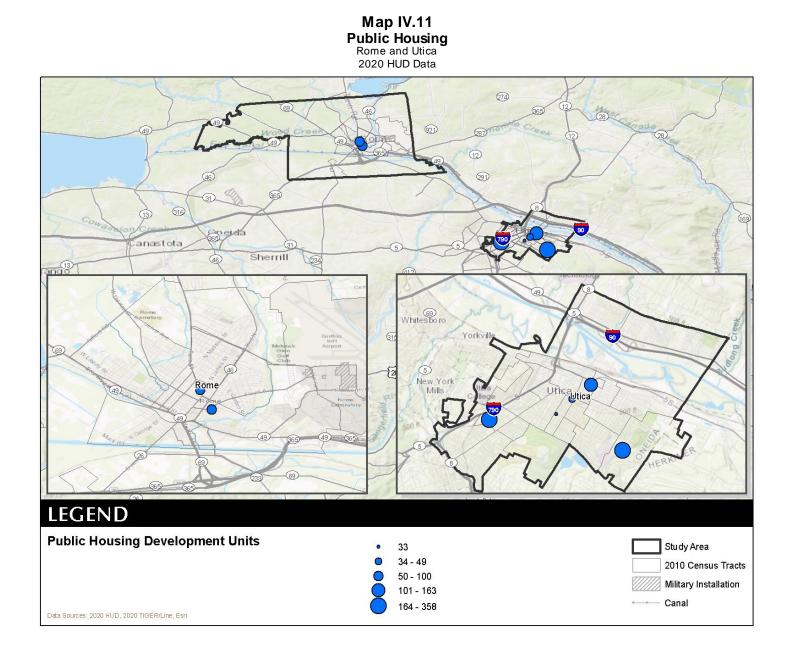
# **E. PUBLICLY SUPPORTED HOUSING ANALYSIS**

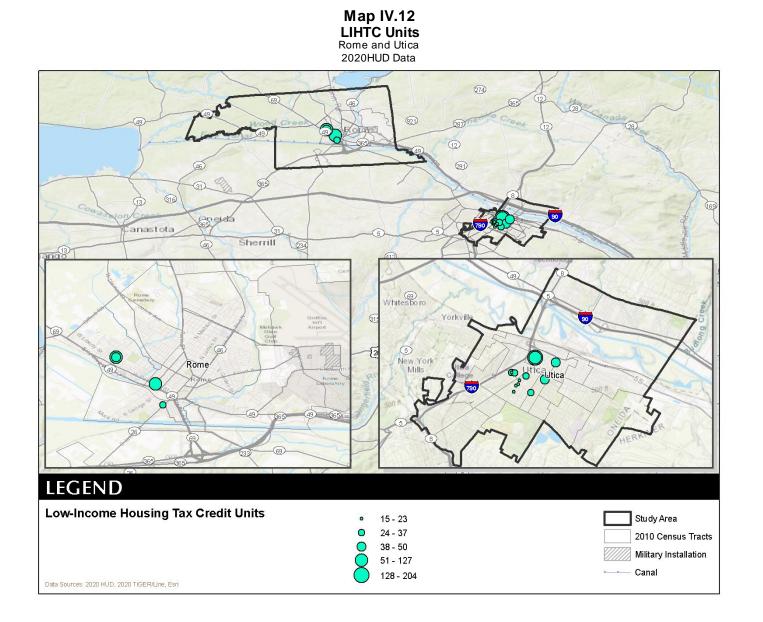
There are a variety of types and locations of public housing units within the Cities of Rome and Utica. According to HUD's AFFH data, there are 1,278 total publicly supported units in Rome. Of these, some 281 are public housing units, 296 are Project Based Section 8, and 701 are Housing Choice Vouchers. In Utica, there are 3,351 publicly supported units. Of these, some 891 are public housing units, 912 are Project Based Section 8, 53 are other HUD multifamily units, and 1,495 are Housing Choice Vouchers.

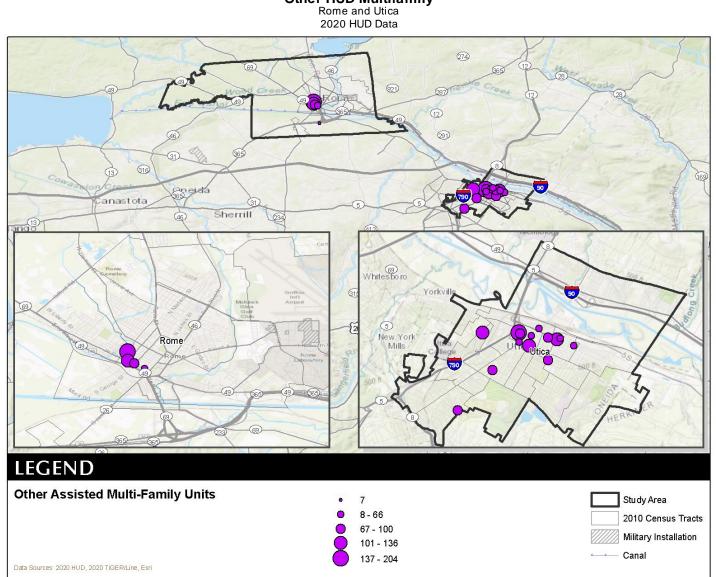
Residents with Disabilities by Subsidized Housing Type Rome city HUD AFFH Raw Database				
Program	Total Units	Total Disabled Units		
Public Housing	281	181		
Project Based Section 8	296	44		
Other HUD Multifamily	0	0		
Housing Choice Vouchers 701 282				
Total	1,278	507		

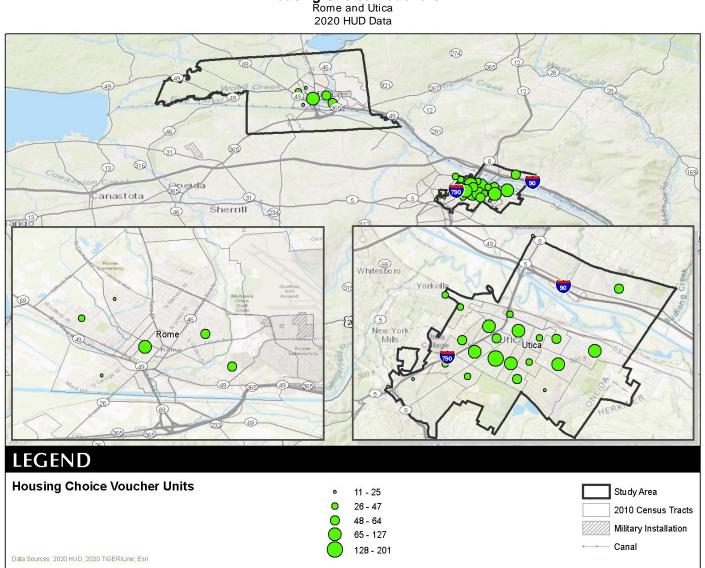
Residents with Disabilities by Subsidized Housing Type Utica city HUD AFFH Raw Database					
Program	Total Units	Total Disabled Units			
Public Housing	891	274			
Project Based Section 8	912	430			
Other HUD Multifamily	53	2			
Housing Choice Vouchers 1,495 439					
Total 3,351 1,145					

These units are shown geographically on the maps on the following pages. Most of the publicly supported housing units tend to be located in areas in the central Cities, which are areas with higher rates of poverty and minority populations.









# F. DISABILITY AND ACCESS ANALYSIS

Section 503 of the Rehabilitation Act of 1973 prohibits discrimination based on disability in any program or activity receiving federal assistance.<sup>12</sup> Title II of the Americans with Disabilities Act of 1990 prohibits discrimination based on disability by public entities. HUD enforces the housing-related activities of public entities, including public housing, housing assistance, and housing referrals.<sup>13</sup>

# Persons with Disabilities

Disability by age, as estimated by the 2018 ACS, is shown in Table IV.44.A in Rome. The disability rate for females was 16.0 percent, compared to 16.4 percent for males. The disability rate grew precipitously higher with age, with 45.7 percent of those over 75 experiencing a disability.

Table IV.44.A         Disability by Age         Rome city         2018 Five-Year ACS Data						
	М	ale	Fe	male	Т	otal
Age	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	38	3.3%	17	1.7%	55	2.5%
5 to 17	117	4.8%	49	2.3%	166	3.7%
18 to 34	269	7.9%	327	9.5%	596	8.7%
35 to 64	1,098	19.3%	1,043	17.4%	2,141	18.3%
65 to 74	505	38.8%	391	26.7%	896	32.4%
75 or Older	409	45.3%	635	46.0%	1,044	45.7%
Total	2,436	16.4%	2,462	16.0%	4,898	16.2%

Disability by age, as estimated by the 2018 ACS, is shown in Table IV.44.B for Utica. The disability rate for females was 17.0 percent, compared to 18.5 percent for males. The disability rate grew precipitously higher with age, with 55.6 percent of those over 75 experiencing a disability.

Table IV.44.B         Disability by Age         Utica city         2018 Five-Year ACS Data						
	М	ale	Fe	male	Т	otal
Age	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	3	0.1%	0	0%	3	0.1%
5 to 17	587	11.3%	276	5.1%	863	8.1%
18 to 34	782	9.7%	601	7.6%	1,383	8.6%
35 to 64	2,350	24.0%	2,355	22.6%	4,705	23.3%
65 to 74	879	36.4%	688	28.2%	1,567	32.3%
75 or Older	813	52.2%	1,264	58.1%	2,077	55.6%
Total	5,414	18.5%	5,184	17.0%	10,598	17.8%

The number of disabilities by type, as estimated by the 2018 ACS, is shown in Table IV.45.A for Rome. Some 9.5 percent have an ambulatory disability, 8.8 percent have an independent living disability, and 3.9 percent have a self-care disability.

<sup>&</sup>lt;sup>12</sup> 29 U.S.C. §§794

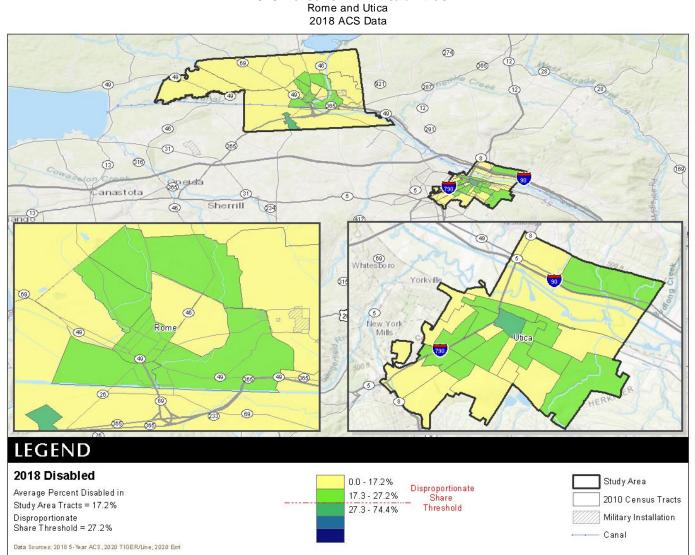
<sup>&</sup>lt;sup>13</sup> 42 U.S.C. §§ 12131 – 12165

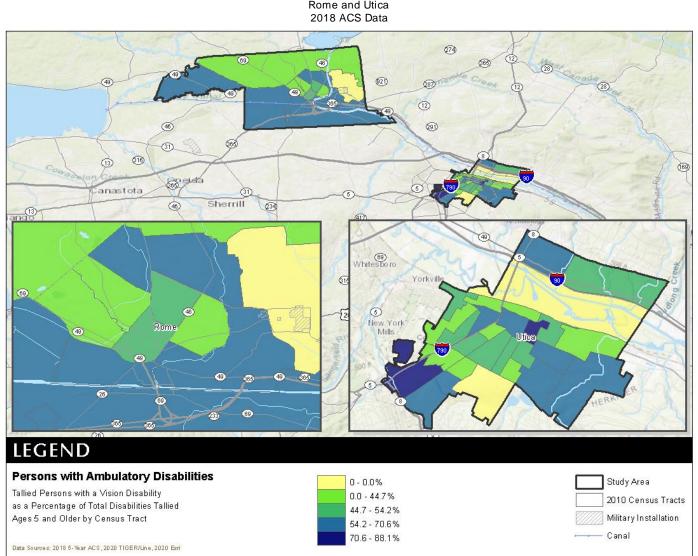
Table IV.45.ATotal Disabilities Tallied: Aged 5 and OlderRome city2018 Five-Year ACS				
Disability Type	Population with Disability	Percent with Disability		
Hearing disability	1,067	3.5%		
Vision disability	758	2.5%		
Cognitive disability	1,989	7.1%		
Ambulatory disability	2,666	9.5%		
Self-Care disability	1,107	3.9%		
Independent living disability	2,072	8.8%		

The number of disabilities by type, as estimated by the 2018 ACS, is shown in Table IV.45.B for Utica. Some 10.7 percent have an ambulatory disability, 8.7 percent have an independent living disability, and 4.2 percent have a self-care disability.

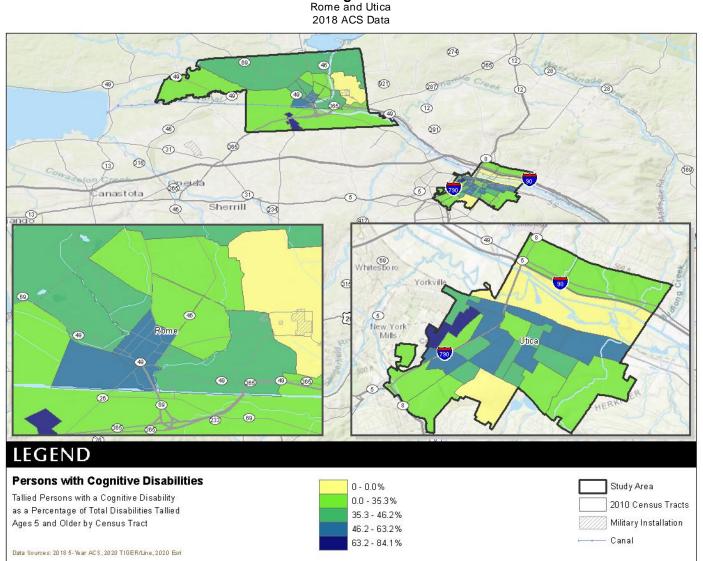
Table IV.45.BTotal Disabilities Tallied: Aged 5 and OlderUtica city2018 Five-Year ACS				
Disability Type	Population with Disability	Percent with Disability		
Hearing disability	2,311	3.9%		
Vision disability	1,819	3.0%		
Cognitive disability	4,406	8.0%		
Ambulatory disability	5,937	10.7%		
Self-Care disability	2,348	4.2%		
Independent living disability	3,879	8.7%		

The geographic distribution of persons with various types of disabilities is shown in the maps on the following pages. There does not appear to be any concentration by disability type in the Cities.

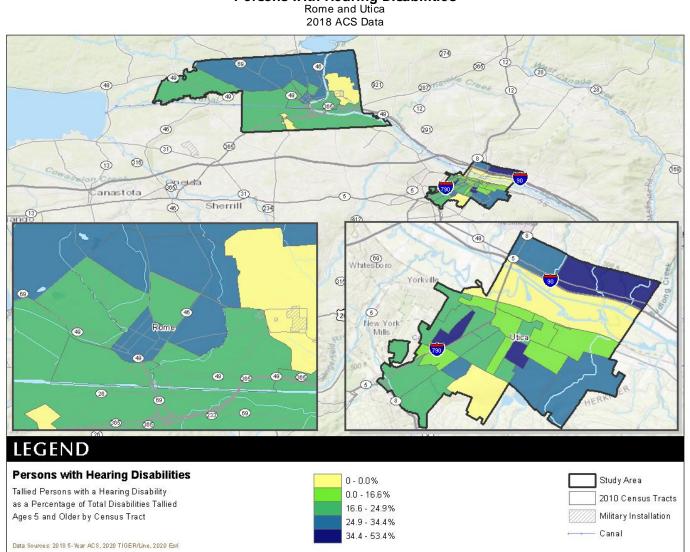




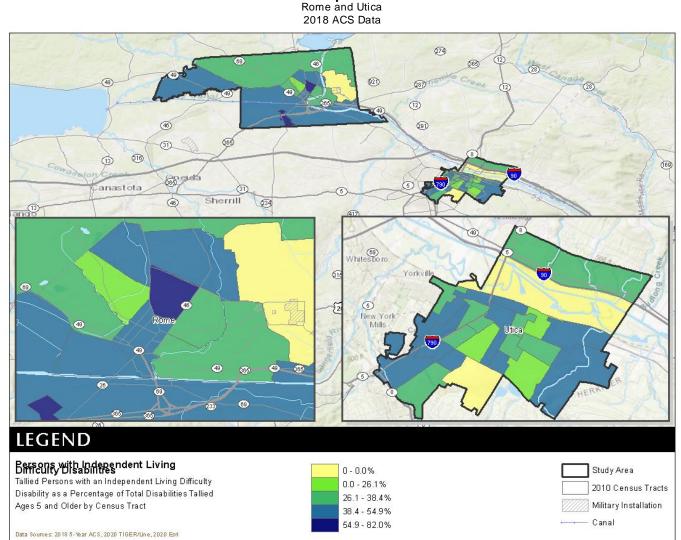
Map IV.16 Persons with Ambulatory Disabilities Rome and Utica 2018 ACS Data



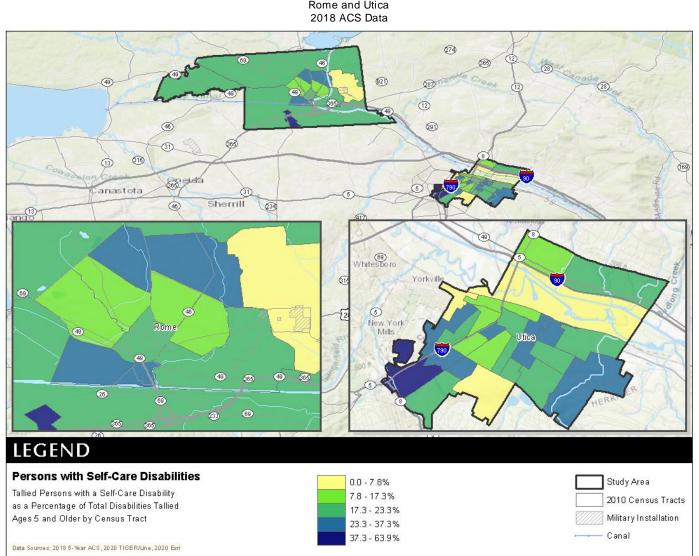
Map IV.16 Persons with Cognitive Disabilities Rome and Utica



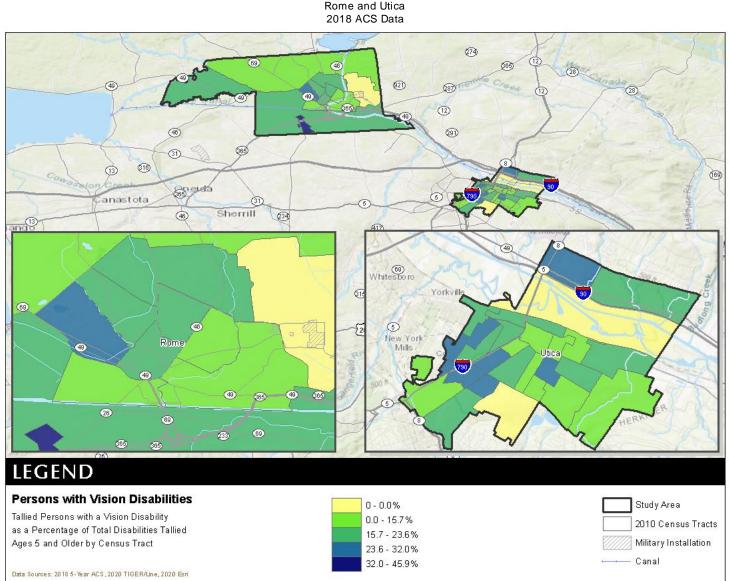
95



Map IV.18 Persons with Independent Disabilities Rome and Utica



Map IV.19 Persons with Self-Care Disabilities Rome and Utica



Map IV.20 Persons with Vision Disabilities Rome and Utica

# Housing Accessibility

Accessible housing units are located throughout the State. However, many newer housing units are located outside city center areas. These newer housing units are more likely to have the mandatory minimum accessibility features.

Some 39.7 percent of publicly supported housing units in Rome and 34.2 percent in Utica, according to HUD's AFFH database, are accessible. This exceeds the rate of disability for the general population in the Cities. However, with the aging population, and the rate of disabilities for persons utilizing publicly supported housing, this may not meet the needs of current and future residents with disabilities.

Residents with Disabilities by Subsidized Housing Type Rome city HUD AFFH Raw Database					
Program	Total Units	Total Disabled Units			
Public Housing	281	181			
Project Based Section 8	296	44			
Other HUD Multifamily	0	0			
Housing Choice Vouchers 701 282					
Total	1,278	507			

Residents with Disabilities by Subsidized Housing Type Utica city HUD AFFH Raw Database					
Program	Total Units	Total Disabled Units			
Public Housing	891	274			
Project Based Section 8	912	430			
Other HUD Multifamily	53	2			
Housing Choice Vouchers	1,495	439			
Total	3,351	1,145			

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

# FEDERAL FAIR HOUSING LAWS

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

# Title VIII of the Civil Rights Act of 1968 (Fair Housing Act)<sup>14</sup>

The Fair Housing Act prohibits discrimination in the sale, rental, financing, and insuring of housing on the basis of race, color, religion, sex, and national origin. In 1988, the act was amended to include family status and disability as protected classes, which includes children under the age of 18 living with parents or legal custodians, pregnant women, and persons securing custody of children under the age of 18. Jurisdictions may add protected classes but are not allowed to subtract from the seven federally protected classes.<sup>15</sup> The Act also contains design and construction accessibility provisions for certain new multi-family dwellings developed for first occupancy on or after March 13, 1991.<sup>16</sup> On April 30, 2013, HUD and the Department of Justice released a <u>Joint Statement</u> that provides guidance regarding the persons, entities, and types of housing and related facilities that are subject to the accessible design and construction requirements of the Act.

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

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

The following are examples of Fair Housing Act violations:

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

<sup>15</sup> "HUD Fair Housing Laws and Presidential Executive Orders."

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

<sup>16</sup> "Title VIII: Fair Housing and Equal http://portal.hud.gov/hudportal/HUD?src=/program offices/fair housing equal opp/progdesc/title8\_\_\_\_\_\_

Rome and Utica Analysis of Impediments

Opportunity."

<sup>&</sup>lt;sup>14</sup> 42 U.S.C. 3601, et. Seq., as amended in 1988

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

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

# Title VI of the Civil Rights Act of 1964

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

# Section 504 of the Rehabilitation Act of 1973

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

Section 109 of the Housing and Community Development Act of 1974 Section 109 prohibits discrimination on the basis of race, color, national origin, sex or religion in programs or activities funded from HUD's Community Development Block Grant Program.

# Title II of the Americans with Disabilities Act of 1990

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

# Architectural Barriers Act of 1968

The Act requires that buildings and facilities designed, constructed, altered, or leased with certain federal funds after September 1969 be accessible to and useable by handicapped persons. The ABA specifies accessibility standards for ramps, parking, doors, elevators, restrooms, assistive listening

systems, fire alarms, signs, and other accessible building elements and are enforced through the Department of Defense, HUD, the General Services Administration, and the U.S. Postal Services.

#### Age Discrimination Act of 1975

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

# Title IX of the Education Amendments Act of 1972

Title IX prohibits discrimination on the basis of sex or blindness in education programs or activities that receive federal financial assistance.<sup>17</sup>

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

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

- Bank, credit union, or savings association
- Total assets must exceed the coverage threshold<sup>18</sup>
- The institution must have had a home or branch office in a Metropolitan Statistical Area (MSA)
- The institution must have originated or refinanced at least one home purchase loan secured by a first lien on a one- to four-family dwelling
- The institution must be federally insured or regulated
- The mortgage loan must have been insured, guaranteed, or supplemented by a federal agency or intended for sale to Fannie Mae or Freddie Mac

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

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

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

Rome and Utica Analysis of Impediments

<sup>&</sup>lt;sup>17</sup> "HUD Fair Housing Laws and Presidential Executive Orders."

<sup>&</sup>lt;sup>18</sup> Each December, the Federal Reserve announces the threshold for the following year. The asset threshold may change from year to year based on changes in the Consumer price Index for Urban Wage Earners and Clerical Workers.

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

### **EXECUTIVE ORDERS**

### Executive Order 11063 Equal Opportunity in Housing

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

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

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

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

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

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

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

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

Signed by President Bush on June 18, 2001, the Order requires federal agencies to evaluate their policies and programs to determine if they need to be revised to improve the availability of community-based living arrangements for persons with disability, noting that isolating or segregating people with disabilities in institutions is a form of disability-based discrimination prohibited by Title II of the ADA.

### STATE FAIR HOUSING LAWS AND RESOURCES

The New York State Human Rights Law protects all of the same characteristics as the federal Fair Housing Act but also makes it illegal to discriminate based on creed, age, sexual orientation, marital status, or military status.

Some local governments afford their residents additional protections. For example, the New York City Human Rights Law prohibits housing discrimination based on: gender, citizenship status, partnership status, gender identity, lawful occupation, and lawful source of income (including public assistance or housing assistance, social security, supplemental security income, pensions, annuities, or unemployment benefits).<sup>19</sup>

### New York Division of Human Rights

The New York Division of Human Rights (DHR) was created to enforce the state Human Rights Law. In service to its mission to ensure that "every individual... has an equal opportunity to participate fully in the economic, cultural, and intellectual life of the State", the DHR prosecutes unlawful discriminatory practices; receives, investigates, and resolves complaints of discrimination; promotes awareness among members of the public concerning their rights and obligations under the law; and develops human rights policies and legislation for the State. Auburn residents who believe that their right to fair housing choice has been violated may contact the local office of the Division of Human Rights through the following information:<sup>20</sup>

### Address:

New York Division of Human Rights 333 E. Washington Street, Room 543 Syracuse, New York 13202 Phone: (315) 428-4633 Fax: (315) 428-4106 Email: InfoSyracuse@dhr.ny.gov

### FAIR HOUSING COMPLAINTS

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

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

<sup>&</sup>lt;sup>19</sup> https://ag.ny.gov/civil-rights/fair-housing

<sup>&</sup>lt;sup>20</sup> <u>http://www.dhr.ny.gov/contact-us</u> The Syracuse office of the DHR also serves residents of Cayuga, Jefferson, Oneida, Onondaga, Oswego

There were nine complaints in the City of Rome between 2008 and 2019, compared to 27 complaints for the City of Utica during that time period. Of these complaints, the most common complaint was on the basis of disability, accounting for five complaints for the City of Rome and 15 for the City of Utica.

	Table IV.46.A         Fair Housing Complaints by Basis         Rome city         HUD Fair Housing Complaints												
Basis	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Total
Disability	0	1	0	0	0	0	1	1	0	0	0	2	5
Race	0	0	2	1	0	0	1	0	0	0	0	0	4
National Origin	0	0	0	0	1	0	0	0	0	0	0	0	1
basis	1	0	0	0	0	0	0	0	0	0	0	0	1
Total Basis	1	1	2	1	1	0	2	1	0	0	0	2	11
Total Complaints	1	1	2	1	1	0	2	1	0	0	0	2	9

	Table IV.46.B         Fair Housing Complaints by Basis         Utica city         HUD Fair Housing Complaints												
Basis	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Total
Race	4	2	0	2	2	2	0	0	1	0	0	1	15
Disability	1	0	0	0	1	1	1	0	1	1	1	1	8
National Origin	0	0	1	0	0	0	0	0	2	0	0	0	3
Color	1	0	0	0	0	0	0	0	1	0	0	0	2
Sex	0	1	0	0	0	0	0	0	1	0	0	0	2
Total Basis	6	3	1	2	3	3	1	0	6	1	1	2	30
Total Complaints	6	3	1	2	3	3	1	0	6	1	1	2	27

There was one complaint found to be with cause between 2008 and 2019 for the City of Rome, and five complaints found with cause for the City of Utica. The complaint with cause for the City of Rome was on the basis of disability. Two complaints with cause for the City of Utica were on the basis of race, and three complaints were on the basis of disability.

Table IV.47.A         Fair Housing Complaints with Cause by Basis         Rome city         HUD Fair Housing Complaints													
Basis	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Total
Disability	0	0	0	0	0	0	0	1	0	0	0	0	1
Total Basis	0	0	0	0	0	0	0	1	0	0	0	0	1
Total Complaints	0	0	0	0	0	0	0	1	0	0	0	0	1

Table IV.47.B         Fair Housing Complaints with Cause by Basis         Utica city         HUD Fair Housing Complaints													
Basis	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Total
Disability	1	0	0	0	0	0	0	0	0	0	1	1	3
Race	2	0	0	0	0	0	0	0	0	0	0	0	2
Total Basis	3	0	0	0	0	0	0	0	0	0	1	1	5
Total Complaints	3	0	0	0	0	0	0	0	0	0	1	1	5

The fair housing issue identified in the one complaint with cause in Rome was discriminatory refusal to rent and negotiate for rental. In Utica, the most common fair housing issue for complaints with cause was discriminatory refusal to rent, accounting for three complaints, followed by discriminatory terms, conditions, privileges, or services and facilities, and failure to make reasonable accommodation.

Table IV.48.A         Fair Housing Complaints with Cause by Issue         Rome city         HUD Fair Housing Complaints													
Issue	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Total
Discriminatory refusal to rent and negotiate for rental	0	0	0	0	0	0	0	1	0	0	0	0	1
Total Issues	0	0	0	0	0	0	0	1	0	0	0	0	1
Total Complaints	0	0	0	0	0	0	0	1	0	0	0	0	1

Table IV.48.B         Fair Housing Complaints with Cause by Issue         Utica city         HUD Fair Housing Complaints													
Issue	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Total
Discriminatory refusal to rent	2	0	0	0	0	0	0	0	0	0	0	1	3
Discriminatory terms, conditions, privileges, or services and facilities	1	0	0	0	0	0	0	0	0	0	1	0	2
Failure to make reasonable accommodation	0	0	0	0	0	0	0	0	0	0	1	1	2
Total Issues	3	0	0	0	0	0	0	0	0	0	2	2	7
Total Complaints	3	0	0	0	0	0	0	0	0	0	1	1	5

### H. FAIR HOUSING SURVEY RESULTS

The Fair Housing survey has a total of 146 responses. Some 131 respondents represented Rome, while two represented Utica. Responses by City are available in the Appendix.

What Communit Utica	Table IV.49What Community do you live in?Utica-Rome cityFair Housing Survey								
Community	Number of Respondents:								
Rome city	131								
Utica city	2								
Both	13								
Other	0								
Total	146								

Respondents were most likely to be a service provider.

Table IV.50What is your primary role in the housing industryUtica-Rome city Fair Housing Survey								
Role	Total							
Homeowner or Renter	0							
Service Provider	139							
Property Manager	0							
Local Government	0							
Law/Legal Services	1							
Insurance	1							
Construction/Development	1							
Lending/Mortgage Industry	0							
Real Estate Sales/Brokerage	0							
Appraisal	0							
Other	3							
Missing	0							
Total	146							

The majority of respondents, or 99 out of 146, were homeowners. Some 42 were considered renters.

<b>Table</b> Tenure of <sup>Utica-Ro Fair Housir</sup>	Respondent? me city
Role	Total
Homeowner	99
Renter	42
Other	0
Missing	1
Total	146

When asked how familiar they are with fair housing laws, most respondents that answered the question indicated they were at least somewhat familiar, accounting to 47 respondents in the survey.

Table IV.52How familiar are you with FairHousing LawsUtica-Rome cityFair Housing Survey								
Response	Total							
Very Familiar	10							
Somewhat Familiar	37							
Not Familiar	0							
Missing	55							
Total	146							

Most respondents also believed that fair housing laws are useful, accounting for 53 total responses. Some 21 respondents felt that fair housing laws are difficult to understand, while 28 respondents did not. Results were mixed when asked if fair housing laws are adequately enforced.

Table IV.53         Federal, State, and Local Fair Housing Laws         Utica-Rome city         2019 Fair Housing Survey Data									
Question	Yes	No	Don't Know	Missing	Total				
Do you think fair housing laws serve a useful purpose?	53	7	29	57	146				
Do you think fair housing laws are difficult to understand or follow?	21	28	41	56	146				
Do you feel that fair housing laws are adequately enforced in your community?	9	17	60	60	146				

Only three respondents were aware of any educational activities or training opportunities, and only two were aware of fair housing testing in their community. No respondents have participated in fair housing activities or training.

Table IV.54         Federal, State, and Local Fair Housing Laws         Utica-Rome city         2019 Fair Housing Survey Data										
Question	Yes	No	Don't Know	Missing	Total					
Outreach and education activities, such as training and seminars, are used to help people better understand their rights and obligations under fair housing law. Are you aware of any educational activities or training opportunities available to you to learn about fair housing laws?	3	63	14	66	146					
If you answered "yes" to the previous question, have you participated in fair housing activities or training within the last	0	19	4	123	146					
12 months? Fair housing testing is often used to assess potential violations of fair housing law. Testing can include activities such as evaluating building practices to determine compliance with Americans with Disabilities Act (ADA) laws or testing if some people are treated differently when inquiring about available rental units. Are you aware of any fair housing testing conducted in your community?	2	64	13	67	146					

Respondents were most likely to be aware of impediments to fair housing choice in the private sector in the rental housing market and real estate industry, followed by the mortgage and home

lending industry. However, the majority of respondents were not aware of impediments in any of these areas.

Table IV.55         Barriers to Fair Housing in the Private Sector         Utica-Rome city         2019 Fair Housing Survey Data									
Question	Yes	No	Don't Know	Missing	Total				
Are you aware of any "impediments to fair hou	sing choic	e" in these	e areas in your o	community?					
The rental housing market? Example: Refusing to rent based on religion or color.	16	39	15	76	146				
The real estate industry? Example: Only showing properties to families with children in certain areas.	16	38	15	77	146				
The mortgage and home lending industry? Example: Offering higher interest rates only to women or racial minorities.	12	37	21	76	146				
The housing construction or housing design fields? Example: New rental complexes built with narrow doorways that do not allow wheelchair accessibility.	10	38	22	76	146				
The home insurance industry? Example: Limiting policies and coverage for racial minorities.	9	36	24	77	146				
The home appraisal industry? Example: Basing home values on the ethnic composition of neighborhoods.	11	33	26	76	146				
Any other housing services?	5	32	28	81	146				

When asked about barriers in the public sector, respondents were most likely to be aware of barriers that limit access to government services, such as a lack of transportation, employment, or social services. This was followed by neighborhood or community development policies.

	V.56	Dublie	Sootor						
Barriers to Fair Housi			Sector						
Utica-Rome city 2019 Fair Housing Survey Data									
Question	Yes	No	Don't Know	Missing	Total				
Are you aware of any impediments or barriers to	fair housi	ng choice	in your commur	ity regarding:	:				
Land use policies? Example: Policies that concentrate multi- family housing in limited areas.	8	35	17	86	146				
Zoning laws? Example: Laws that restrict placement of group homes.	8	32	19	87	146				
Occupancy standards or health and safety codes? Example: Codes being inadequately enforced in immigrant communities compared to other areas.	10	33	17	86	146				
Property assessment and tax policies? Example: Lackof tax incentives for making reasonable accommodations or modifications for the disabled.	7	32	21	86	146				
The permitting process? Example: Not offering written documents on procedures in alternate languages.	4	33	23	86	146				
Housing construction standards? Example: Lackof or confusing guidelines for construction of accessible housing.	9	32	19	86	146				
Neighborhood or community development policies? Example: Policies that encourage development in narrowly defined areas of the community.	11	28	21	86	146				
Are you aware of any barriers that limit access to government services, such as a lackof transportation, employment, or social services?	13	31	13	89	146				
Are there any other local government actions or regulations in your community that act as barriers to fair housing choice?	7	21	30	88	146				

Respondents found that access to mental health care, and a lack of affordable housing were most likely to significantly impact their community.

	Fair	Table I Housing in Utica-Rom Fair Housing	n the Public	Sector			
Question	Not at all	Slightly	Moderately	Significantly	Don't Know	Missing	Total
Hov	w do the facto	rs listed belo	w affect your co	ommunity?			
Access to public transportation to schools, work, health care, services	7	12	13	21	6	87	146
Access to good nutrition, healthy food, fresh vegetables, etc	13	14	11	15	6	87	146
Access to school choice	14	9	13	18	5	87	146
Access to proficient Public Schools	14	9	16	13	7	87	146
Access to parks, libraries, other public facilities	15	14	11	13	6	87	146
Access to health care	12	9	15	17	5	88	146
Access to mental health care	6	6	13	22	12	87	146
Access for seniors and/or people with disabilities to public transportation	8	11	10	21	9	87	146
Lack of affordable housing	10	6	11	22	10	87	146
Lack of affordable Public Housing	10	6	7	19	17	87	146
Lack of acceptance of housing choice vouchers	6	5	7	10	31	87	146
Access to education about fair housing laws	6	6	10	16	21	87	146
Gentrification and displacement due to economic pressures	8	7	9	11	23	88	146
Lack of collaboration between agencies	4	5	5	16	29	87	146
Other	5	0	1	2	28	110	146

Respondents found that a lack of affordable single-family house and a lack of affordable rental housing were most likely to significantly impact their community.

	Fai			c Sector			
Question	Not at all	Slightly	Moderately	Significantly	Don't Know	Missing	Total
Do you believe these issues are hap	opening in yo	ur community	/? If so, how mu	ch are the issues	s impacting	your communit	y?
Segregation	16	16	10	7	11	86	146
Concentrations of racial or ethnic minorities	7	15	12	11	13	88	146
Concentrations of poverty Differences in access to housing opportunities	2	16	14	21	5	88	146
for people of various income, races, ethnicity, genders, family status	5	9	14	17	13	88	146
Greater share of housing problems for those at lower incomes, of a specific race or ethnicity or national origin, disability, gender, or family status.	5	8	13	19	13	88	146
Challenges for persons with disabilities	4	10	10	16	18	88	146
Lack of housing discrimination enforcement	7	3	7	14	27	88	146
Lack of affordable single-family houses	8	7	13	22	8	88	146
Lack of affordable rental housing	6	4	16	22	10	88	146
Lack of acceptance of housing choice vouchers	3	3	5	10	36	89	146
No or limited education about fair housing laws	3	4	11	14	26	88	146
Gentrification and displacement due to economic pressures	8	7	7	12	24	88	146
Lack of diversity and equity in the School District	13	6	9	13	17	88	146
Other	4	0	0	2	24	116	146

## Section V. Fair Housing Goals and Priorities

### Overview

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

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

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

### Assessing Fair Housing

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

In 1994, HUD published a rule consolidating plans for housing and community development programs into a single planning process. This action grouped the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grants (ESG)<sup>21</sup>, and Housing Opportunities for Persons with AIDS (HOPWA) programs into the Consolidated Plan for Housing and Community Development, which then created a single application cycle. As a part of the consolidated planning process, and entitlement communities that receive such funds from HUD are required to submit to HUD certification that they are affirmatively furthering fair housing (AFFH). This was described in the Analysis of Impediments to Fair Housing Choice and a Fair Housing Planning Guide offering methods to conduct such a study was released in March of 1993.

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

<sup>&</sup>lt;sup>21</sup> The Emergency Shelter Grants program was renamed the Emergency Solutions Grants program in 2011.

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

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

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

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

### **Overview of Findings**

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

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

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

	Table	
	Contributin	
	Rome an	
Contributing Factors Moderate to high levels of segregation	<b>Priority</b> High	JustificationIn 2017, black and Asian households had a moderate to high level of segregation in Utica, according to the Dissimilarity Index. This level of segregation has grown since 2010. In Rome, Asian and Native American households had moderate to high levels of segregation, however, these households represent a very small proportion of the population.
Inequitable access to proficient schools and labor market engagement	Med	Black and Asian households in Rome have less access to proficient schools and labor market engagement, as indicated by the Access to Opportunity index. Black, Hispanic, and Asian households in Utica have less access to proficient schools and labor market engagement, However, the Cities have little control over impacting labor market engagement on a large scale.
Insufficient affordable housing in a range of unit sizes	High	Some 30.5 percent of households in Rome, and 39.3 percent of households in Utica have cost burdens. This is more significant for renter households, of which 44.1 percent of households in Rome and 55.2 percent in Utica have cost burdens. This signifies a lack of housing options that are affordable to a large proportion of the population.
Insufficient accessible affordable housing	High	An estimated 16.2 and 17.8 percent of persons in Rome and Utica, respectively, have a disability. For those aged 75 and older, this rate increases to 45.7 and 55.6 percent. The need for accessible housing will increase as the population continues to age.
Discriminatory patterns in Lending	Med	The mortgage denial rates for black and Hispanic households are higher than the jurisdiction average according to 2008-2018 HMDA data.
Insufficient accessible affordable housing	High	The number of accessible affordable units may not meet the need of the growing elderly and disabled population, particularly as the population continues to age. Some 55.8 percent of persons aged 75 and older have at least one form of disability.
Lack of fair housing infrastructure	High	The fair housing survey and public input indicated a lack of collaboration among agencies to support fair housing.
Insufficient fair housing education	High	The fair housing survey and public input indicated a lack of knowledge about fair housing and a need for education.
Insufficient understanding of credit	High	The fair housing survey and public input indicated an insufficient understanding of credit needed to access mortgages.

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

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

Fair Housing Goal	Impediments to Fair Housing Choice/ Contributing Factors	Recommended Actions		
Promote affordable homeow nership and rental opportunities in areas with lower poverty	Moderate to high levels of segregation Inequitable access to proficient schools and labor market engagement Insufficient affordable housing in a	Continue to promote homeownership and affordable rental opportunities in high opportunity areas with the use of CDBG and HOME funds. Over the next five (5) years: <b>Rome:</b> Assist 5 households with homeowner rehabilitation, down payment assistance or credit counseling		
	range of unit sizes	Utica: 100 Rental units constructed 100 Rental units rehabilitated 25 Homeowner Housing Added 50 Homeowner Housing Rehabilitated		
Promote Community Development activities in areas with higher rates of poverty	Moderate to high levels of segregation Inequitable access to proficient schools and labor market engagement	Continue to promote economic development, public facilities, and infrastructure improvements with CDBG funds in low to moderate income neighborhoods or to benefit LMI households. Over the next five (5) years: <b>Rome:</b> Benefit 5,000 households with improved access to infrastructure and public facilities Assist 2 businesses with economic development activities Continue to promote economic development through downtown revitalization and other methods. <sup>22</sup> <b>Utica:</b> Benefit 15,000 households with improved access to infrastructure and public facilities Assist 30 businesses with economic development		
Promote community and service provider knowledge of ADA laws	Insufficient accessible affordable housing	activities Rome and Utica: Increase outreach and education for housing providers in the Cities, focusing on legal requirements concerning reasonable accommodation, in coordination with local disability advocate organizations. Record activities annually.		
Increase outreach and education for housing providers in the Cities	Discriminatory patterns in Lending Lack of fair housing infrastructure Insufficient fair housing education Insufficient understanding of credit	Rome and Utica:         Continue to conduct fair housing outreach and education targeting rental tenants, providing an overview of fair housing laws and examples of discrimination that housing consumers may encour in the rental housing market.         Continue working with the State Attorney General a CNY Fair Housing to promote fair housing and process complaints         Continue to promote education through website and online materials. Provide fair housing materials in alternative languages.         Record activities annually.		

<sup>&</sup>lt;sup>22</sup> The City of Rome's economic development activities includes the use of downtown revitalization grant from the State, and the Business Assistance fund, which are used to help set up or expand businesses to increase vibrancy and impact the overall economic health of the community. The City will continue these efforts to promote self-sufficiency and reduce the number of households with cost burdens.

# Section VI. Appendices

### A. ADDITIONAL PLAN DATA

						able I.7							
	Loan	Applica	tions b	y Select		on Take Iome city	en by Ra	ace/Ethr	nicity of	Applica	ant		
						0118 HMDA	Data						
Race		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
	Originated	0	0	0	0	0	0	0	0	0	0	0	0
American	Denied	0	0	0	0	0	0	0	0	0	0	0	0
Indian	Denial Rate	%	%	%	%	%	%	%	%	%	%	%	%
	Originated	3	0	2	0	0	1	1	1	1	4	2	15
Asian	Denied	0	0	0	0	0	0	0	1	0	0	0	1
	Denial Rate	0.0%	%	0.0%	%	%	0.0%	0.0%	50.0%	0.0%	0.0%	0.0%	6.2%
	Originated	6	2	0	2	3	7	4	8	3	6	5	46
Black	Denied	0	0	3	0	1	0	0	3	2	2	2	13
DIACK	Denial Rate	0.0%	0.0%	100.0 %	0.0%	25.0%	0.0%	0.0%	27.3%	40.0%	25.0%	28.6%	22.0%
5	Originated	0	0	0	0	0	0	1	1	0	1	1	4
Pacific	Denied	0	0	0	0	0	0	0	0	0	0	0	0
Islander	Denial Rate	%	%	%	%	%	%	0.0%	0.0%	%	0.0%	0.0%	0.0%
	Originated	193	162	111	146	196	163	144	168	214	235	194	1926
White	Denied	27	11	17	15	18	19	29	23	42	28	25	254
	Denial Rate	12.3%	6.4%	13.3%	9.3%	8.4%	10.4%	14.3%	12.0%	16.4%	10.6%	11.4%	11.7%
•• .	Originated	2	4	9	6	7	10	12	8	11	11	12	92
Not Available	Denied	5	0	0	0	4	5	2	4	5	5	2	32
Available	Denial Rate	71.4%	0.0%	0.0%	0.0%	36.4%	33.3%	14.3%	33.3%	31.2%	31.2%	14.3%	25.8%
NI /	Originated	0	0	0	0	0	0	0	0	0	0	0	0
Not Applicable	Denied	0	0	0	0	0	0	0	0	0	0	0	0
Applicable	Denial Rate	%	%	%	%	%	%	%	%	%	%	%	%
	Originated	204	168	122	154	206	181	162	186	229	257	215	2,084
Total	Denied	32	11	20	15	23	24	31	31	49	35	30	301
	Denial Rate	13.6%	6.1%	14.1%	8.9%	10.0%	11.7%	16.1%	14.3%	17.6%	12.0%	12.2%	12.6%
	Originated	4	5	1	3	1	2	2	7	4	6	4	39
Hispanic	Denied	1	0	0	0	0	0	3	0	2	2	1	9
	Denial Rate	20.0%	0.0%	0.0%	0.0%	0.0%	0.0%	60.0%	0.0%	33.3%	25.0%	20.0%	18.8%
	Originated	199	160	113	145	199	167	152	170	218	241	196	1960
Non-Hispanic	Denied	27	11	20	15	19	21	24	28	44	28	26	263
	Denial Rate	11.9%	6.4%	15.0%	9.4%	8.7%	11.2%	13.6%	14.1%	16.8%	10.4%	11.7%	11.8%

				0.1		able I.7							
	Loan	Applica	itions by	y Select		<b>on Take</b> Itica city	en by Ra	ice/Ethi	nicity of	Applica	ant		
						18 HMDA	Data						
Race		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
	Originated	0	0	1	0	0	0	0	0	2	0	1	4
American	Denied	0	0	0	1	0	0	0	0	2	1	0	4
Indian	Denial Rate	%	%	0.0%	100.0 %	%	%	%	%	50.0%	100.0 %	0.0%	50.0%
	Originated	15	12	9	14	15	31	34	44	39	44	46	303
Asian	Denied	4	4	3	9	5	8	3	4	14	12	3	69
	Denial Rate	21.1%	25.0%	25.0%	39.1%	25.0%	20.5%	8.1%	8.3%	26.4%	21.4%	6.1%	18.5%
	Originated	13	16	5	7	9	12	10	12	21	20	19	144
Black	Denied	2	4	2	2	5	8	5	5	1	6	5	45
	Denial Rate	13.3%	20.0%	28.6%	22.2%	35.7%	40.0%	33.3%	29.4%	4.5%	23.1%	20.8%	23.8%
	Originated	1	0	1	0	1	0	2	0	0	1	0	6
Pacific	Denied	0	1	0	0	1	0	1	0	0	0	1	4
Islander	Denial Rate	0.0%	100.0 %	0.0%	%	50.0%	%	33.3%	%	%	0.0%	100.0 %	40.0%
	Originated	257	214	205	160	181	213	257	227	260	271	230	2475
White	Denied	42	24	23	27	26	28	34	26	43	31	43	347
	Denial Rate	14.0%	10.1%	10.1%	14.4%	12.6%	11.6%	20.0%	10.3%	14.2%	10.3%	15.8%	12.3%
NI-	Originated	10	14	13	8	15	23	16	11	16	18	19	163
Not Available	Denied	10	7	3	8	9	7	4	4	5	6	8	71
Available	Denial Rate	50.0%	33.3%	18.8%	50.0%	37.5%	23.3%	20.0%	26.7%	23.8%	25.0%	29.6%	30.3%
NI-	Originated	0	0	0	0	0	0	0	0	0	0	0	0
Not Applicable	Denied	0	0	0	0	0	0	0	0	0	0	0	0
, ippricable	Denial Rate	%	%	%	%	%	%	%	%	%	%	%	%
	Originated	296	256	234	189	221	279	319	294	338	354	315	3,095
Total	Denied	58	40	31	47	46	51	47	39	65	56	61	541
	Denial Rate	16.4%	13.5%	11.7%	19.9%	17.2%	15.5%	12.8%	11.7%	16.1%	13.7%	16.2%	14.9%
	Originated	11	13	5	2	8	7	8	7	16	21	17	115
Hispanic	Denied	6	3	1	6	5	6	2	5	4	8	8	54
	Denial Rate	35.3%	18.8%	16.7%	75.0%	38.5%	46.2%	20.0%	41.7%	20.0%	27.6%	32.0%	32.0%
	Originated	276	230	217	180	199	249	299	277	306	316	275	2824
Non-Hispanic	Denied	47	32	27	37	34	39	42	30	56	44	44	432
	Denial Rate	14.6%	12.2%	11.1%	17.1%	14.6%	13.5%	12.3%	9.8%	15.5%	12.2%	13.8%	13.3%

Table I.8.A           Loan Applications by Reason for Denial by Race/Ethnicity of Applicant           Rome city           2008–2018 HMDA Data									
Denial Reason	American Indian	Asian	Black	Pacific Islander	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	0	0	3	0	62	5	0	70	0
Employment History	0	0	0	0	4	1	0	5	0
Credit History	0	1	2	0	31	4	0	39	0
Collateral	0	0	1	0	29	7	0	37	0
Insufficient Cash	0	0	0	0	9	3	0	12	0
Unverifiable Information	0	0	1	0	9	0	0	10	0
Credit Application Incomplete	0	0	2	0	29	2	0	33	0
Mortgage Insurance Denied	0	0	0	0	0	0	0	0	0
Other	0	0	0	0	25	7	0	32	0
Missing	0	0	4	0	56	3	0	63	9
Total	0	1	13	0	254	32	0	301	9
% Missing	%	0.0%	30.8%	%	22.0%	9.4%	%	20.9%	100.0%

Table I.8.B         Loan Applications by Reason for Denial by Race/Ethnicity of Applicant         Utica city         2008–2018 HMDA Data									
Denial Reason	American Indian	Asian	Black	Pacific Islander	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	1	18	7	2	66	16	0	110	1
Employment History	0	3	0	1	13	0	0	17	0
Credit History	2	7	11	0	47	14	0	81	2
Collateral	0	13	4	1	46	12	0	76	0
Insufficient Cash	0	6	4	0	15	2	0	27	0
Unverifiable Information	0	2	3	0	13	6	0	25	0
Credit Application Incomplete	1	1	4	0	29	11	0	46	1
Mortgage Insurance Denied	0	0	0	0	2	0	0	2	0
Other	0	13	3	0	46	5	0	67	0
Missing	0	6	9	0	70	5	0	90	50
Total	4	69	45	4	347	71	0	541	54
% Missing	0.0%	8.7%	20.0%	0.0%	20.2%	7.0%	%	16.6%	92.6%

	Table I.9.A         Denial Rates by Gender of Applicant         Rome city         2008–2018 HMDA Data									
Year	Male	Female	Not Available	Not Applicable	Average					
2008	13.4%	13.5%	20.0%	%	13.6%					
2009	5.9%	6.9%	0.0%	%	6.1%					
2010	12.9%	17.3%	0.0%	%	14.1%					
2011	10.0%	7.5%	0.0%	%	8.9%					
2012	9.6%	9.2%	33.3%	%	10.0%					
2013	9.2%	14.6%	25.0%	%	11.7%					
2014	17.5%	11.5%	33.3%	%	16.1%					
2015	11.9%	15.6%	60.0%	%	14.3%					
2016	16.1%	18.3%	36.4%	%	17.6%					
2017	11.4%	10.2%	40.0%	%	12.0%					
2018	13.3%	10.3%	15.4%	%	12.2%					
Average	12.1%	12.3%	27.1%	%	12.6%					

Table I.9.BDenial Rates by Gender of ApplicantUtica city2008–2018 HMDA Data									
Year	Male	Female	Not Available	Not Applicable	Average				
2008	16.1%	14.5%	57.1%	%	16.4%				
2009	16.2%	6.2%	50.0%	%	13.5%				
2010	15.5%	7.0%	11.1%	%	11.7%				
2011	21.7%	15.6%	37.5%	%	19.9%				
2012	18.2%	13.7%	38.5%	%	17.2%				
2013	13.5%	17.9%	28.6%	%	15.5%				
2014	13.5%	12.0%	10.0%	%	12.8%				
2015	12.5%	9.7%	22.2%	%	11.7%				
2016	18.8%	10.5%	21.4%	%	16.1%				
2017	14.7%	11.8%	16.7%	%	13.7%				
2018	11.6%	21.2%	35.7%	%	16.2%				
Average	15.4%	12.8%	28.6%	%	14.9%				

		Loan <i>i</i>	Applica	tions by		Table Action Rome cit –2018 HM	n Taken	by Gen	der of A	pplicant	t		
Gender		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
	Originated	136	111	74	90	123	108	104	119	146	163	117	1291
Male	Denied	21	7	11	10	13	11	22	16	28	21	18	178
	Denial Rate	13.4%	5.9%	12.9%	10.0%	9.6%	9.2%	17.5%	11.9%	16.1%	11.4%	13.3%	12.1%
	Originated	64	54	43	62	79	70	54	65	76	88	87	742
Female	Denied	10	4	9	5	8	12	7	12	17	10	10	104
	Denial Rate	13.5%	6.9%	17.3%	7.5%	9.2%	14.6%	11.5%	15.6%	18.3%	10.2%	10.3%	12.3%
Net	Originated	4	3	5	2	4	3	4	2	7	6	11	51
Not Available	Denied	1	0	0	0	2	1	2	3	4	4	2	19
Available	Denial Rate	20.0%	0.0%	0.0%	0.0%	33.3%	25.0%	33.3%	60.0%	36.4%	40.0%	15.4%	27.1%
Not	Originated	0	0	0	0	0	0	0	0	0	0	0	0
Not Applicable	Denied	0	0	0	0	0	0	0	0	0	0	0	0
Аррпсаыс	Denial Rate	%	%	%	%	%	%	%	%	%	%	%	%
	Originated	204	168	122	154	206	181	162	186	229	257	215	2,084
Total	Denied	32	11	20	15	23	24	31	31	49	35	30	301
	Denial Rate	13.6%	6.1%	14.1%	8.9%	10.0%	11.7%	16.1%	14.3%	17.6%	12.0%	12.2%	12.6%

		Loan	Applicat	tions by		Table I d Action Utica city –2018 HM	n Taken	by Gen	der of A	pplicant	:			
Gender														
	Originated	187	145	120	108	112	173	193	175	208	197	191	1809	
Male	Denied	36	28	22	30	25	27	30	25	48	34	25	330	
	Denial Rate	16.1%	16.2%	15.5%	21.7%	18.2%	13.5%	13.5%	12.5%	18.8%	14.7%	11.6%	15.4%	
	Originated	106	106	106	76	101	101	117	112	119	142	115	1201	
Female	Denied	18	7	8	14	16	22	16	12	14	19	31	177	
	Denial Rate	14.5%	6.2%	7.0%	15.6%	13.7%	17.9%	12.0%	9.7%	10.5%	11.8%	21.2%	12.8%	
	Originated	3	5	8	5	8	5	9	7	11	15	9	85	
Not Available	Denied	4	5	1	3	5	2	1	2	3	3	5	34	
/ Wallable	Denial Rate	57.1%	50.0%	11.1%	37.5%	38.5%	28.6%	10.0%	22.2%	21.4%	16.7%	35.7%	28.6%	
Net	Originated	0	0	0	0	0	0	0	0	0	0	0	0	
Not Applicable	Denied	0	0	0	0	0	0	0	0	0	0	0	0	
Apphoable	Denial Rate	%	%	%	%	%	%	%	%	%	%	%	%	
	Originated	296	256	234	189	221	279	319	294	338	354	315	3,095	
Total	Denied	58	40	31	47	46	51	47	39	65	56	61	541	
	Denial Rate	16.4%	13.5%	11.7%	19.9%	17.2%	15.5%	12.8%	11.7%	16.1%	13.7%	16.2%	14.9%	

			Den	ial Rate	s by Inc Rome		Applica	nt						
ncome 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 2018 Total														
\$30,000 or Below	·													
\$30,001-\$50,000														
\$50,001-\$75,000	8.5%	0.0%	7.4%	6.8%	9.4%	7.9%	10.2%	12.5%	18.8%	7.4%	12.0%	9.6%		
\$75,001-\$100,000	9.5%	21.4%	7.7%	0.0%	13.8%	8.0%	13.8%	11.1%	18.4%	12.0%	10.3%	11.8%		
\$100,001-\$150,000	12.5%	16.7%	12.5%	0.0%	12.5%	11.1%	16.7%	4.0%	11.1%	4.5%	0.0%	8.0%		
Above \$150,000	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	12.5%	0.0%	25.0%	25.0%	50.0%	12.8%		
Data Missing	%	%	%	%	%	%	%	%	%	%	%	%		
Total	13.6%	6.1%	14.1%	8.9%	10.0%	11.7%	16.1%	14.3%	17.6%	12.0%	12.2%	12.6%		

			Den	ial Rate	<b>s by Inc</b> Utica		Applica	int							
Income	ncome 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 2018 Total														
\$30,000 or Below	Bit in the second sec														
\$30,001-\$50,000															
\$50,001-\$75,000	18.2%	6.5%	13.8%	13.6%	15.5%	5.1%	11.4%	11.0%	12.8%	12.2%	12.7%	12.3%			
\$75,001-\$100,000	14.3%	9.1%	4.0%	25.0%	12.5%	12.5%	17.2%	20.0%	8.2%	13.3%	11.4%	12.9%			
\$100,001-\$150,000	0.0%	0.0%	0.0%	0.0%	11.1%	5.6%	0.0%	7.1%	5.6%	18.5%	16.0%	7.9%			
Above \$150,000	0.0%	50.0%	0.0%	0.0%	28.6%	33.3%	0.0%	14.3%	0.0%	16.7%	14.3%	14.8%			
Data Missing	%	%	%	%	%	%	%	%	%	%	%	%			
Total	16.4%	13.5%	11.7%	19.9%	17.2%	15.5%	12.8%	11.7%	16.1%	13.7%	16.2%	14.9%			

		Loan A <sub>l</sub>	pplicatio	ons by I	ncome	able I.1 of Appli		iginate	d and D	enied			
						018 HMDA	Data						
Income		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
	Loan Originated	27	26	22	20	33	18	14	27	34	23	14	258
\$30,000 or Below	Application Denied	9	1	7	6	7	6	10	9	12	8	6	81
	Denial Rate	25.0%	3.7%	24.1%	23.1%	17.5%	25.0%	41.7%	25.0%	26.1%	25.8%	30.0%	23.9%
	Loan Originated	95	69	52	62	79	70	48	71	80	88	70	784
\$30,001 -\$50,000	Application Denied	15	6	9	6	5	10	7	13	12	12	8	103
	Denial Rate	13.6%	8.0%	14.8%	8.8%	6.0%	12.5%	12.7%	15.5%	13.0%	12.0%	10.3%	11.6%
	Loan Originated	54	56	25	41	58	58	53	35	65	75	73	593
\$50,001 -\$75,000	Application Denied	5	0	2	3	6	5	6	5	15	6	10	63
	Denial Rate	8.5%	0.0%	7.4%	6.8%	9.4%	7.9%	10.2%	12.5%	18.8%	7.4%	12.0%	9.6%
	Loan Originated	19	11	12	21	25	23	25	24	31	44	35	270
\$75,001 -\$100,000	Application Denied	2	3	1	0	4	2	4	3	7	6	4	36
	Denial Rate	9.5%	21.4%	7.7%	0.0%	13.8%	8.0%	13.8%	11.1%	18.4%	12.0%	10.3%	11.8%
	Loan Originated	7	5	7	7	7	8	15	24	16	21	21	138
\$100,001 -150,000	Application Denied	1	1	1	0	1	1	3	1	2	1	0	12
	Denial Rate	12.5%	16.7%	12.5%	0.0%	12.5%	11.1%	16.7%	4.0%	11.1%	4.5%	0.0%	8.0%
	Loan Originated	2	1	4	3	4	4	7	5	3	6	2	41
Above \$150,000	Application Denied	0	0	0	0	0	0	1	0	1	2	2	6
	Denial Rate	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	12.5%	0.0%	25.0%	25.0%	50.0%	12.8%
	Loan Originated	0	0	0	0	0	0	0	0	0	0	0	0
Data Missing	Application Denied	0	0	0	0	0	0	0	0	0	0	0	0
	Denial Rate	%	%	%	%	%	%	%	%	%	%	%	%
	Loan Originated	204	168	122	154	206	181	162	186	229	257	215	2,084
Total	Application Denied	32	11	20	15	23	24	31	31	49	35	30	301
	Denial Rate	13.6%	6.1%	14.1%	8.9%	10.0%	11.7%	16.1%	14.3%	17.6%	12.0%	12.2%	12.6%

					Т	able I.1	2.B						
		Loan A	pplicatio	ons by I	ncome	of Appli	cant: Or	iginate	d and D	enied			
						Jtica city 018 HMDA	Data						
Income		2008	2009	2010	2000-2	2012	2013	2014	2015	2016	2017	2018	Total
moome	Loan Originated	65	59	48	35	47	81	72	69	64	63	62	665
\$30,000 or Below	Application Denied	22	16	14	17	14	24	16	15	31	17	15	201
	Denial Rate	25.3%	21.3%	22.6%	32.7%	23.0%	22.9%	18.2%	17.9%	32.6%	21.2%	19.5%	23.2%
	Loan Originated	127	111	93	77	87	100	126	105	131	146	92	1195
\$30,001 -\$50,000	Application Denied	17	16	8	18	16	18	16	6	18	16	22	171
	Denial Rate	11.8%	12.6%	7.9%	18.9%	15.5%	15.3%	11.3%	5.4%	12.1%	9.9%	19.3%	12.5%
	Loan Originated	72	58	50	51	60	56	78	73	75	79	103	755
\$50,001 -\$75,000	Application Denied	16	4	8	8	11	3	10	9	11	11	15	106
	Denial Rate	18.2%	6.5%	13.8%	13.6%	15.5%	5.1%	11.4%	11.0%	12.8%	12.2%	12.7%	12.3%
	Loan Originated	18	20	24	12	14	21	24	28	45	39	31	276
\$75,001 -\$100,000	Application Denied	3	2	1	4	2	3	5	7	4	6	4	41
	Denial Rate	14.3%	9.1%	4.0%	25.0%	12.5%	12.5%	17.2%	20.0%	8.2%	13.3%	11.4%	12.9%
	Loan Originated	9	6	14	11	8	17	14	13	17	22	21	152
\$100,001 -150,000	Application Denied	0	0	0	0	1	1	0	1	1	5	4	13
	Denial Rate	0.0%	0.0%	0.0%	0.0%	11.1%	5.6%	0.0%	7.1%	5.6%	18.5%	16.0%	7.9%
	Loan Originated	5	2	5	3	5	4	5	6	6	5	6	52
Above \$150,000	Application Denied	0	2	0	0	2	2	0	1	0	1	1	9
	Denial Rate	0.0%	50.0%	0.0%	0.0%	28.6%	33.3%	0.0%	14.3%	0.0%	16.7%	14.3%	14.8%
	Loan Originated	0	0	0	0	0	0	0	0	0	0	0	0
Data Missing	Application Denied	0	0	0	0	0	0	0	0	0	0	0	0
	Denial Rate	%	%	%	%	%	%	%	%	%	%	%	%
	Loan Originated	296	256	234	189	221	279	319	294	338	354	315	3,095
Total	Application Denied	58	40	31	47	46	51	47	39	65	56	61	541
	Denial Rate	16.4%	13.5%	11.7%	19.9%	17.2%	15.5%	12.8%	11.7%	16.1%	13.7%	16.2%	14.9%

	Denial Ra	tes of Loa	ns by Rac	<b>able 1.13.</b> e/Ethnicity Rome city 018 HMDA Da	and Incom	ne of Applic	ant	
Race	\$30,000 or Below	\$30,001 - \$50,000	\$50,001 -\$75,000	\$75,001 \$100,000	\$100,001 -\$150,000	> \$150,000	Data Missing	Average
American Indian	%	%	%	%	%	%	%	%
Asian	%	9.1%	0.0%	%	%	0.0%	%	6.2%
Black	50.0%	10.0%	20.0%	33.3%	25.0%	0.0%	%	22.0%
Pacific Islander	%	%	0.0%	0.0%	0.0%	0.0%	%	0.0%
White	22.4%	10.9%	8.7%	10.3%	7.3%	11.9%	%	11.7%
Not Available	38.9%	24.0%	22.6%	29.4%	12.5%	%	%	25.8%
Not Applicable	%	%	%	%	%	%	%	%
Average	23.9%	11.6	9.6%	11.8%	8.0%	12.8%	%	12.6%
Non-Hispanic	33.3%	22.2	14.3%	12.5%	0.0%	0.0%	%	18.8%
Hispanic	23.2%	10.9	8.8%	10.6%	7.8%	11.1%	%	11.8%

	Table I.13.B         Denial Rates of Loans by Race/Ethnicity and Income of Applicant         Utica city         2008–2018 HMDA Data													
Race	Race \$30,000 \$30,001 \$50,001 \$75,001 \$100,001 Data or Below – \$50,000 –\$75,000 –\$100,000 –\$150,000 > \$150,000 Missing Average													
American Indian	100.0%	50.0%	0.0%	50.0%	%	%	%	50.0%						
Asian	20.1%	14.4%	25.0%	12.5%	0.0%	0.0%	%	18.5%						
Black	23.6%	21.1%	45.8%	9.1%	12.5%	0.0%	%	23.8%						
Pacific Islander	42.9%	0.0%	100.0%	%	%	%	%	40.0%						
White	21.8%	10.3%	10.1%	10.8%	6.8%	15.8%	%	12.3%						
Not Available	42.1%	26.9%	21.1%	47.1%	25.0%	0.0%	%	30.3%						
Not Applicable	%	%	%	%	%	%	%	%						
Average	23.2%	12.5	12.3%	12.9%	7.9%	14.8%	%	14.9%						
Non-Hispanic	41.3%	22.6	22.2%	50.0%	50.0%	0.0%	%	32.0%						
Hispanic	21.0%	11.5	11.3%	9.4%	6.5%	14.3%	%	13.3%						

L	oan Applications	by Income		<b>e/Ethnicity</b> Rome city 2018 HMDA		ant: Origina	ated and De	enied	
Race		\$30,000 or Below	\$30,001 - \$50,000	\$50,001 -\$75,000	\$75,001 -\$100,000	\$100,001 -\$150,000	> \$150,000	Data Missing	Total
	Loan Originated	0	0	0	0	0	0	0	0
American Indian	Application Denied	0	0	0	0	0	0	0	0
	Denial Rate	%	%	%	%	%	%	%	%
	Loan Originated	0	10	3	0	0	2	0	15
Asian	Application Denied	0	1	0	0	0	0	0	1
	Denial Rate	%	9.1%	0.0%	%	%	0.05	%	6.2%
	Loan Originated	4	18	16	4	3	1	0	46
Black	Application Denied	4	2	4	2	1	0	0	13
	Denial Rate	50.0%	10.0%	20.0%	33.3%	25.0%	0.0%	%	0.0%
	Loan Originated	0	0	1	1	1	1	0	4
Pacific Islander	Application Denied	0	0	0	0	0	0	0	0
	Denial Rate	%	%	0.0%	0.0%	0.0%	0.0%	%	0.0%
	Loan Originated	243	718	548	253	127	37	0	1926
White	Application Denied	70	88	52	29	10	5	0	254
	Denial Rate	22.4%	10.9%	8.7%	10.3%	7.3%	11.9%	%	11.7%
	Loan Originated	11	38	24	12	7	0	0	92
Not Available	Application Denied	7	12	7	5	1	0	0	32
	Denial Rate	38.9%	24.0%	22.6%	29.4%	12.5%	%	%	25.8%
	Loan Originated	0	0	0	0	0	0	0	0
Not Applicable	Application Denied	0	0	0	0	0	0	0	0
	Denial Rate	%	%	%	%	%	%	%	%
	Loan Originated	258	784	593	270	138	41	0	2,084
Total	Application Denied	81	103	63	36	12	6	0	301
	Denial Rate	23.9%	11.6%	9.6%	11.8%	8.0%	12.8%	%	12.6%
	Loan Originated	4	14	12	7	1	1	0	39
Hispanic	Application Denied	2	4	2	1	0	0	0	9
	Denial Rate	33.3%	22.2%	14.3%	12.5%	0.0%	0.0%	%	18.8%
	Loan Originated	245	730	562	253	130	40	0	1960
Non-Hispanic	Application Denied	74	89	54	30	11	5	0	263
	Denial Rate	23.2%	10.9%	8.8%	10.6%	7.8%	11.1%	%	11.8%

L	oan Applications	by Income	e and Race	Utica city	of Applica	ant: Origina	ated and De	nied	
		<b>A</b> AA <b>A</b> AA		2018 HMDA		<b>A</b> 4 <b>A A A A A</b>			
Race		\$30,000 or Below	\$30,001 - \$50,000	\$50,001 -\$75,000	\$75,001 -\$100,000	\$100,001 -\$150,000	> \$150,000	Data Missing	Total
	Loan Originated	0	1	2	1	0	0	0	4
American Indian	Application Denied	2	1	0	1	0	0	0	4
	Denial Rate	100.0%	50.0%	0.0%	50.0%	%	%	%	50.0%
	Loan Originated	187	89	18	7	1	1	0	303
Asian	Application Denied	47	15	6	1	0	0	0	69
	Denial Rate	20.1%	14.4%	25.0%	12.5%	0.0%	0.05	%	18.5%
	Loan Originated	42	71	13	10	7	1	0	144
Black	Application Denied	13	19	11	1	1	0	0	45
	Denial Rate	23.6%	21.1%	45.8%	9.1%	12.5%	0.0%	%	40.0%
	Loan Originated	4	2	0	0	0	0	0	6
Pacific Islander	Application Denied	3	0	1	0	0	0	0	4
	Denial Rate	42.9%	0.0%	100.0%	%	%	%	%	40.0%
	Loan Originated	399	964	677	249	138	48	0	2475
White	Application Denied	111	111	76	30	10	9	0	347
	Denial Rate	21.8%	10.3%	10.1%	10.8%	6.8%	15.8%	%	12.3%
	Loan Originated	33	68	45	9	6	2	0	163
Not Available	Application Denied	24	25	12	8	2	0	0	71
	Denial Rate	42.1%	26.9%	21.1%	47.1%	25.0%	0.0%	%	30.3%
	Loan Originated	0	0	0	0	0	0	0	0
Not Applicable	Application Denied	0	0	0	0	0	0	0	0
	Denial Rate	%	%	%	%	%	%	%	%
	Loan Originated	665	1195	755	276	152	52	0	3,095
Total	Application Denied	201	171	106	41	13	9	0	541
	Denial Rate	23.2%	12.5%	12.3%	12.9%	7.9%	14.8%	%	14.9%
	Loan Originated	37	48	21	7	1	1	0	115
Hispanic	Application Denied	26	14	6	7	1	0	0	54
	Denial Rate	41.3%	22.6%	22.2%	50.0%	50.0%	0.0%	%	32.0%
	Loan Originated	598	1082	691	260	145	48	0	2824
Non-Hispanic	Application Denied	159	140	88	27	10	8	0	432
	Denial Rate	21.0%	11.5%	11.3%	9.4%	6.5%	14.3%	%	13.3%

## **PREDATORY LENDING**

		O	riginate		er-Occi Ro	ble I.1 upied L me city 8 HMDA	oans by	y HAL S	itatus			
Loan Type	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
HAL	28	10	0	0	0	0	0	1	1	0	0	40
Other	176	158	122	154	206	181	162	185	228	257	215	2044
Total	204	168	122	154	206	181	162	186	229	257	215	2,084
Percent HAL	13.7%	6.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.5%	0.4%	0.0%	0.0%	1.9%

		O	riginate		er-Occi	ica city	oans by	/ HAL S	tatus			
Loan Type	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
HAL	37	15	0	0	1	0	0	0	1	1	2	57
Other	259	241	234	189	220	279	319	294	337	353	313	3038
Total	296	256	234	189	221	279	319	294	338	354	315	3,095
Percent HAL	12.5%	5.9%	0.0%	0.0%	0.5%	0.0%	0.0%	0.0%	0.3%	0.3%	0.6%	1.8%

				Loans	oy Loan	Table I. Purpose Rome city 2018 HMD	e by HAL	. Status					
Loan Purpose	Loan Purpose 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 2018 Total												
Home	HAL	28	10	0	0	0	0	0	1	1	0	0	40
	Other	176	158	122	154	206	181	162	185	228	257	215	2044
Purchase	Percent HAL	13.7%	6.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.5%	0.4%	0.0%	0.0%	1.9%
Llomo	HAL	3	4	4	0	3	2	0	1	0	0	1	18
Home	Other	105	89	71	70	88	96	80	99	98	123	20	939
Improvement	Percent HAL	2.8%	4.3%	5.3%	0.0%	3.3%	2.0%	0.0%	1.0%	0.0%	0.0%	4.8%	1.9%
	HAL	32	12	2	1	4	7	1	9	5	5	4	82
Refinancing	Other	143	183	208	180	270	263	158	172	175	145	120	2017
	Percent HAL	18.3%	6.2%	1.0%	0.6%	1.5%	2.6%	0.6%	5.0%	2.8%	3.3%	3.2%	1.9%
	HAL	63	26	6	1	7	9	1	11	6	5	6	141
Total	Other	424	430	401	404	564	540	400	456	501	525	377	5022
	Percent HAL	12.9%	5.7%	1.5%	0.2%	1.2%	1.6%	0.2%	2.4%	1.2%	0.9%	1.6%	2.7%

				Loans I	oy Loan	Table I. Purpose Utica city 2018 HMD	by HAL	. Status					
Loan Purpose	Loan Purpose 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 2018 Total												
Home	HAL	37	15	0	0	1	0	0	0	1	1	2	57
Purchase	Other	259	241	234	189	220	279	319	294	337	353	313	3038
T UICHASE	Percent HAL	12.5%	5.9%	0.0%	0.0%	0.5%	0.0%	0.0%	0.0%	0.3%	0.3%	0.6%	1.8%
Home	HAL	25	13	6	2	9	3	2	3	1	3	1	68
	Other	144	84	91	87	118	122	107	153	198	206	48	1358
Improvement	Percent HAL	14.8%	13.4%	6.2%	2.2%	7.1%	2.4%	1.8%	1.9%	0.5%	1.4%	2.0%	1.8%
	HAL	64	33	2	5	7	6	8	13	4	5	3	150
Refinancing	Other	170	202	239	252	276	312	188	207	235	199	135	2415
	Percent HAL	27.4%	14.0%	0.8%	1.9%	2.5%	1.9%	4.1%	5.9%	1.7%	2.5%	2.2%	1.8%
	HAL	126	61	8	7	17	9	10	16	6	9	8	277
Total	Other	573	527	564	528	614	713	614	654	770	758	557	6872
	Percent HAL	18.0%	10.4%	1.4%	1.3%	2.7%	1.2%	1.6%	2.4%	0.8%	1.2%	1.4%	3.9%

			HALs		ated b	e city	of Bor	rower				
Race	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
American Indian	0	0	nan	nan	nan	nan	0	0	0	nan	nan	0
Asian	1	0	nan	nan	nan	nan	0	0	0	nan	nan	1
Black	2	0	nan	nan	nan	nan	0	0	0	nan	nan	2
Pacific Islander	0	0	nan	nan	nan	nan	0	0	0	nan	nan	0
White	25	10	nan	nan	nan	nan	0	1	1	nan	nan	37
Not Available	0	0	nan	nan	nan	nan	0	0	0	nan	nan	0
Not Applicable	0	0	nan	nan	nan	nan	0	0	0	nan	nan	0
Total	28	10	0	0	0	0	0	1	1	0	0	40
Hispanic	0	0	nan	nan	nan	nan	0	0	0	nan	nan	39
Non-Hispanic	28	10	nan	nan	nan	nan	0	1	1	nan	nan	1920

			HALs		ated b	a city	of Bor	rower							
Race															
American Indian	0	0	nan	nan	0	nan	0	nan	0	0	0	0			
Asian	0	0	nan	nan	0	nan	0	nan	0	0	0	0			
Black	3	1	nan	nan	0	nan	0	nan	0	1	0	5			
Pacific Islander	0	0	nan	nan	0	nan	0	nan	0	0	0	0			
White	31	11	nan	nan	1	nan	0	nan	1	0	2	46			
Not Available	3	3	nan	nan	0	nan	0	nan	0	0	0	6			
Not Applicable	0	0	nan	nan	0	nan	0	nan	0	0	0	0			
Total	37	15	0	0	1	0	0	0	1	1	2	57			
Hispanic	2	1	nan	nan	0	nan	0	nan	0	0	0	112			
Non-Hispanic	32	11	nan	nan	1	nan	0	nan	1	1	2	2776			

		Rate	of HAL	.s Origi	nated k Ro	ble I.1 by Race me city 18 HMDA	/Ethnic	ity of B	orrowe	•r					
Race															
American Indian	%	%	%	%	%	%	%	%	%	%	%	%			
Asian	33.3%	%	%	%	%	%	0.0%	0.0%	0.0%	%	%	6.7%			
Black	33.3%	0.0%	%	%	%	%	0.0%	0.0%	0.0%	%	%	4.3%			
Pacific Islander	%	%	%	%	%	%	0.0%	0.0%	%	%	%	0.0%			
White	13.0%	6.2%	%	%	%	%	0.0%	0.6%	0.5%	%	%	1.9%			
Not Available	0.0%	0.0%	%	%	%	%	0.0%	0.0%	0.0%	%	%	0.0%			
Not Applicable	%	%	%	%	%	%	%	%	%	%	%	%			
Average	13.7%	6.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.5%	0.4%	0.0%	0.0%	1.9%			
Hispanic	0.0%	0.0%	%	%	%	%	0.0%	0.0%	0.0%	%	%	0.0%			
Non-Hispanic	14.1%	6.2%	%	%	%	%	0.0%	0.6%	0.5%	%	%	2.0%			

		Rate	of HAL		nated k Ut	ble I.1 by Race ica city 18 HMDA	/Ethnic	ity of B	orrowe	r					
Race															
American Indian	merican Indian % % % % % % % 0.0% % 0.0%														
Asian	0.0%	0.0%	%	%	0.0%	%	0.0%	%	0.0%	0.0%	0.0%	0.0%			
Black	23.1%	6.2%	%	%	0.0%	%	0.0%	%	0.0%	5.0%	0.0%	3.5%			
Pacific Islander	0.0%	%	%	%	0.0%	%	0.0%	%	%	0.0%	%	0.0%			
White	12.1%	5.1%	%	%	0.6%	%	0.0%	%	0.4%	0.0%	0.9%	1.9%			
Not Available	30.0%	21.4%	%	%	0.0%	%	0.0%	%	0.0%	0.0%	0.0%	3.7%			
Not Applicable	%	%	%	%	%	%	%	%	%	%	%	%			
Average	12.5%	5.9%	0.0%	0.0%	0.5%	0.0%	0.0%	0.0%	0.3%	0.3%	0.6%	1.8%			
Hispanic	18.2%	7.7%	%	%	0.0%	%	0.0%	%	0.0%	0.0%	0.0%	2.6%			
Non-Hispanic	11.6%	4.8%	%	%	0.5%	%	0.0%	%	0.3%	0.3%	0.7%	1.7%			

		Lo	oans by	HAL St	atus by Ro	<b>ble I.1</b> Race/E me city 18 HMDA	thnicity	/ of Bor	rower				
Race	Loan Type	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
	HAL	0	0	nan	nan	nan	nan	0	0	0	nan	nan	0
American Indian	Other	0	0	0	0	0	0	0	0	0	0	0	0
	Percent HAL	%	%	%	%	%	%	%	%	%	%	%	%
	HAL	1	0	nan	nan	nan	nan	0	0	0	nan	nan	1
Asian	Other	2	0	2	0	0	1	1	1	1	4	2	14
	Percent HAL	33.3%	%	%	%	%	%	0.0%	0.0%	0.0%	%	%	6.7%
	HAL	2	0	nan	nan	nan	nan	0	0	0	nan	nan	2
Black	Other	4	2	0	2	3	7	4	8	3	6	5	44
	Percent HAL	33.3%	0.0%	%	%	%	%	0.0%	0.0%	0.0%	%	%	4.3%
	HAL	0	0	nan	nan	nan	nan	0	0	0	nan	nan	0
Pacific Islander	Other	0	0	0	0	0	0	1	1	0	1	1	4
	Percent HAL	%	%	%	%	%	%	0.0%	0.0%	%	%	%	0.0%
	HAL	25	10	nan	nan	nan	nan	0	1	1	nan	nan	37
White	Other	168	152	111	146	196	163	144	167	213	235	194	1889
	Percent HAL	13.0%	6.2%	%	%	%	%	0.0%	0.6%	0.5%	%	%	1.9%
	HAL	0	0	nan	nan	nan	nan	0	0	0	nan	nan	0
Not Available	Other	2	4	9	6	7	10	12	8	11	11	12	44
	Percent HAL	0.0%	0.0%	%	%	%	%	0.0%	0.0%	0.0%	%	%	0.0%
	HAL	0	0	nan	nan	nan	nan	0	0	0	nan	nan	0
Not Applicable	Other	0	0	0	0	0	0	0	0	0	0	0	0
	Percent HAL	%	%	%	%	%	%	%	%	%	%	%	%
	HAL	28	10	0	0	0	0	0	1	1	0	0	40
Total	Other	176	158	122	154	206	181	162	185	228	257	215	2044
	Percent HAL	13.7%	6.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.5%	0.4%	0.0%	0.0%	1.9%
	HAL	0	0	nan	nan	nan	nan	0	0	0	nan	nan	39
Hispanic	Other	4	5	1	3	1	2	2	7	4	6	4	0
	Percent HAL	0.0%	0.0%	%	%	%	%	0.0%	0.0%	0.0%	%	%	0.0%
	HAL	28	10	nan	nan	nan	nan	0	1	1	nan	nan	1920
Non-Hispanic	Other	171	150	113	145	199	167	152	169	217	241	196	40
	Percent HAL	14.1%	6.2%	%	%	%	%	0.0%	0.6%	0.5%	%	%	2.0%

		Lo	oans by	HAL St	atus by	ble I.19 Race/E ica city 18 HMDA	thnicity	of Bor	rower				
Race	Loan Type	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
	HAL	0	0	nan	nan	0	nan	0	nan	0	0	0	0
American Indian	Other	0	0	1	0	0	0	0	0	2	0	1	4
	Percent HAL	%	%	%	%	%	%	%	%	0.0%	%	0.0%	0.0%
	HAL	0	0	nan	nan	0	nan	0	nan	0	0	0	0
Asian	Other	15	12	9	14	15	31	34	44	39	44	46	303
	Percent HAL	0.0%	0.0%	%	%	0.0%	%	0.0%	%	0.0%	0.0%	0.0%	0.0%
	HAL	3	1	nan	nan	0	nan	0	nan	0	1	0	5
Black	Other	10	15	5	7	9	12	10	12	21	19	19	139
	Percent HAL	23.1%	6.2%	%	%	0.0%	%	0.0%	%	0.0%	5.0%	0.0%	3.5%
	HAL	0	0	nan	nan	0	nan	0	nan	0	0	0	0
Pacific Islander	Other	1	0	1	0	1	0	2	0	0	1	0	6
	Percent HAL	0.0%	%	%	%	0.0%	%	0.0%	%	%	0.0%	%	0.0%
	HAL	31	11	nan	nan	1	nan	0	nan	1	0	2	46
White	Other	226	203	205	160	180	213	257	227	259	271	228	2429
	Percent HAL	12.1%	5.1%	%	%	0.6%	%	0.0%	%	0.4%	0.0%	0.9%	1.9%
	HAL	3	3	nan	nan	0	nan	0	nan	0	0	0	6
Not Available	Other	7	11	13	8	15	23	16	11	16	18	19	139
	Percent HAL	30.0%	21.4%	%	%	0.0%	%	0.0%	%	0.0%	0.0%	0.0%	3.7%
	HAL	0	0	nan	nan	0	nan	0	nan	0	0	0	0
Not Applicable	Other	0	0	0	0	0	0	0	0	0	0	0	0
	Percent HAL	%	%	%	%	%	%	%	%	%	%	%	%
	HAL	37	15	0	0	1	0	0	0	1	1	2	57
Total	Other	259	241	234	189	220	279	319	294	337	353	313	3038
	Percent HAL	12.5%	5.9%	0.0%	0.0%	0.5%	0.0%	0.0%	0.0%	0.3%	0.3%	0.6%	1.8%
	HAL	2	1	nan	nan	0	nan	0	nan	0	0	0	112
Hispanic	Other	9	12	5	2	8	7	8	7	16	21	17	3
	Percent HAL	18.2%	7.7%	%	%	0.0%	%	0.0%	%	0.0%	0.0%	0.0%	2.6%
	HAL	32	11	nan	nan	1	nan	0.070	nan	1	1	2	2776
Non-Hispanic	Other	244	219	217	180	198	249	299	277	305	315	273	48
	Percent HAL	11.6%	4.8%	%	%	0.5%	%	0.0%	%	0.3%	0.3%	0.7%	1.7%
				,0	70	0.070	,0	0.070	,0	0.070	0.070	0.1 /0	/5

			Rate		ALs by I	ne city	of Bori	ower							
Income 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 2018 Average															
\$30,000 or Below	18.5%	0.0%	%	%	%	%	0.0%	0.0%	0.0%	%	%	1.9%			
\$30,001-\$50,000															
\$50,001-\$75,000	7.4%	1.8%	%	%	%	%	0.0%	0.0%	0.0%	%	%	0.8%			
\$75,001-\$100,000	15.8%	0.0%	%	%	%	%	0.0%	0.0%	0.0%	%	%	1.1%			
\$100,00–150,000	0.0%	0.0%	%	%	%	%	0.0%	4.2%	6.2%	%	%	1.4%			
Above \$150,000	0.0%	0.0%	%	%	%	%	0.0%	0.0%	0.0%	%	%	0.0%			
Data Missing	%	%	%	%	%	%	%	%	%	%	%	%			
Average	13.7%	6.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.5%	0.4%	0.0%	0.0%	1.9%			

			Rate	es of H# 2	ALs by I Utic	ole 1.20 Income ca city 3 HMDA D	of Bori	rower						
Income 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 2018 Average														
\$30,000 or Below	21.5%	5.1%	%	%	0.0%	%	0.0%	%	0.0%	0.0%	1.6%	2.7%		
\$30,001-\$50,000	9.4%	7.2%	%	%	1.1%	%	0.0%	%	0.0%	0.7%	0.0%	1.8%		
\$50,001-\$75,000	12.5%	5.2%	%	%	0.0%	%	0.0%	%	0.0%	0.0%	1.0%	1.7%		
\$75,001-\$100,000	11.1%	5.0%	%	%	0.0%	%	0.0%	%	2.2%	0.0%	0.0%	1.4%		
\$100,00-150,000	0.0%	0.0%	%	%	0.0%	%	0.0%	%	0.0%	0.0%	0.0%	0.0%		
Above \$150,000	0.0%	0.0%	%	%	0.0%	%	0.0%	%	0.0%	0.0%	0.0%	0.0%		
Data Missing	%	%	%	%	%	%	%	%	%	%	%	%		
Average	12.5%	5.9%	0.0%	0.0%	0.5%	0.0%	0.0%	0.0%	0.3%	0.3%	0.6%	1.8%		

			Loa	ns by H	AL Stat	Rome city	ncome (	of Borro	ower				
Income		2008	2009	2010	2008– <b>2011</b>	2018 HMİ 2012	DA Data 2013	2014	2015	2016	2017	2018	Total
meenie	HAL	5	0	nan	nan	nan	nan	0	0	0	nan	nan	5
\$30,000	Other	22	26	22	20	33	18	14	27	34	23	14	253
orBelow	Percent HAL	18.5%	0.0%	%	%	%	%	0.0%	0.0%	0.0%	%	%	1.9%
	HAL	16	9	nan	nan	nan	nan	0	0	0	nan	nan	25
\$30,001	Other	79	60	52	62	79	70	48	71	80	88	70	759
-\$50,000	Percent HAL	16.8%	13.0%	%	%	%	%	0.0%	0.0%	0.0%	%	%	3.2%
	HAL	4	1	nan	nan	nan	nan	0	0	0	nan	nan	5
\$50,001	Other	50	55	25	41	58	58	53	35	65	75	73	588
-\$75,000	Percent HAL	7.4%	1.8%	%	%	%	%	0.0%	0.0%	0.0%	%	%	0.8%
	HAL	3	0	nan	nan	nan	nan	0	0	0	nan	nan	3
\$75,001	Other	16	11	12	21	25	23	25	24	31	44	35	267
-\$100,000	Percent HAL	15.8%	0.0%	%	%	%	%	0.0%	0.0%	0.0%	%	%	1.1%
	HAL	0	0	nan	nan	nan	nan	0	1	1	nan	nan	2
\$100,001	Other	7	5	7	7	7	8	15	23	15	21	21	136
-150,000	Percent HAL	0.0%	0.0%	%	%	%	%	0.0%	4.2%	6.2%	%	%	1.4%
	HAL	0	0	nan	nan	nan	nan	0	0	0	nan	nan	0
Above	Other	2	1	4	3	4	4	7	5	3	6	2	41
\$150,000	Percent HAL	0.0%	0.0%	%	%	%	%	0.0%	0.0%	0.0%	%	%	0.0%
	HAL	0	0	nan	nan	nan	nan	0	0	0	nan	nan	0
Data	Other	0	0	0	0	0	0	0	0	0	0	0	0
Missing	Percent HAL	%	%	%	%	%	%	%	%	%	%	%	%
	Other	28	10	0	0	0	0	0	1	1	0	0	40
Total	HAL	176	158	122	154	206	181	162	185	228	257	215	2044
	Percent HAL	13.7%	6.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.5%	0.4%	0.0%	0.0%	1.9%

			Loa	ns by H	AL Stat	Utica city	ncome (	of Borro	ower				
						2018 HMI							
Income		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
\$30.000	HAL	14	3	nan	nan	0	nan	0	nan	0	0	1	18
orBelow	Other	51	56	48	35	47	81	72	69	64	63	61	647
	Percent HAL	21.5%	5.1%	%	%	0.0%	%	0.0%	%	0.0%	0.0%	1.6%	2.7%
\$30,001	HAL	12	8	nan	nan	1	nan	0	nan	0	1	0	22
-\$50,000	Other	115	103	93	77	86	100	126	105	131	145	92	1173
<i><b>400</b>,000</i>	Percent HAL	9.4%	7.2%	%	%	1.1%	%	0.0%	%	0.0%	0.7%	0.0%	1.8%
<b>\$50.004</b>	HAL	9	3	nan	nan	0	nan	0	nan	0	0	1	13
\$50,001 \$75,000	Other	63	55	50	51	60	56	78	73	75	79	102	742
-\$75,000	Percent HAL	12.5%	5.2%	%	%	0.0%	%	0.0%	%	0.0%	0.0%	1.0%	1.7%
<b>A</b> -	HAL	2	1	nan	nan	0	nan	0	nan	1	0	0	4
\$75,001 \$100,000	Other	16	19	24	12	14	21	24	28	44	39	31	272
-\$100,000	Percent HAL	11.1%	5.0%	%	%	0.0%	%	0.0%	%	2.2%	0.0%	0.0%	1.4%
	HAL	0	0	nan	nan	0	nan	0	nan	0	0	0	0
\$100,001 	Other	9	6	14	11	8	17	14	13	17	22	21	152
-150,000	Percent HAL	0.0%	0.0%	%	%	0.0%	%	0.0%	%	0.0%	0.0%	0.0%	0.0%
	HAL	0	0	nan	nan	0	nan	0	nan	0	0	0	0
Above	Other	5	2	5	3	5	4	5	6	6	5	6	52
\$150,000	Percent HAL	0.0%	0.0%	%	%	0.0%	%	0.0%	%	0.0%	0.0%	0.0%	0.0%
	HAL	0	0	nan	nan	0	nan	0	nan	0	0	0	0
Data Missing	Other	0	0	0	0	0	0	0	0	0	0	0	0
Missing	Percent HAL	%	%	%	%	%	%	%	%	%	%	%	%
	Other	37	15	0	0	1	0	0	0	1	1	2	57
Total	HAL	259	241	234	189	220	279	319	294	337	353	313	3038
	Percent HAL	12.5%	5.9%	0.0%	0.0%	0.5%	0.0%	0.0%	0.0%	0.3%	0.3%	0.6%	1.8%

## HOUSING NEEDS ASSESSMENT SURVEY DATA: BOTH

Table 2.11. What Community do you live in? Both Fair Housing Survey					
Community Number of Respondents:					
Rome city	0				
Utica city	0				
Both	13				
Other	0				
Total	13				

Table 2.22. What is your primary role in the housing industry Both Fair Housing Survey					
Role	Total				
Homeowner or Renter	0				
Service Provider	13				
Property Manager	0				
Local Government	0				
Law/Legal Services	0				
Insurance	0				
Construction/Development	0				
Lending/Mortgage Industry	0				
Real Estate Sales/Brokerage	0				
Appraisal	0				
Other	0				
Missing	0				
Total	13				

Table 2.33. Tenure of Respondent?BothFair Housing Survey						
Role	Total					
Homeowner	8					
Renter	5					
Other	0					
Missing	0					
Total	13					

4. How familia Hou	e 2.4 ar are you with Fair using Laws				
Fair Housi	ing Survey				
Response Total					
Very Familiar	2				
Somewhat Familiar	6				
Not Familiar	0				
Missing	2				
Total	13				

Table 2.5         Federal, State, and Local Fair Housing Laws         Both         2019 Fair Housing Survey Data						
Question	Yes	No	Don't Know	Missing	Total	
Do you think fair housing laws serve a useful purpose?	6	2	2	3	13	
Do you think fair housing laws are difficult to understand or follow?	5	3	3	2	13	
Do you feel that fair housing laws are adequately enforced in your community?	0	4	6	3	13	

Table 2.6         Federal, State, and Local Fair Housing Laws         Both         2019 Fair Housing Survey Data						
Question	Yes	No	Don't Know	Missing	Total	
Outreach and education activities, such as training and seminars, are used to help people better understand their rights and obligations under fair housing law. Are you aware of any educational activities or training opportunities available to you to learn about fair housing laws?	1	7	2	3	13	
If you answered "yes" to the previous question, have you participated in fair housing activities or training within the last 12 months?	0	4	0	9	13	
Fair housing testing is often used to assess potential violations of fair housing law. Testing can include activities such as evaluating building practices to determine compliance with Americans with Disabilities Act (ADA) laws or testing if some people are treated differently when inquiring about available rental units. Are you aware of any fair housing testing conducted in your community?	0	8	2	3	13	

Table 2.7							
5. If you have rea	ceived fair housing						
training, where did you receive							
	w did you receive						
	aining?						
Boti							
Fair Housin							
Response Total							
Through legal consultant	0						
Online program or webinar	0						
Seminar with company	0						
Discussion topic at meeting	0						
Community Service provider	0						
Other 0							
Missing	13						
Total	13						

Table 2.8         Barriers to Fair Housing in the Private Sector         Both         Both         Both								
		sing Surve						
Question	Yes	No	Don't Know	Missing	Total			
Are you aware of any "impediments	to fair hou	using choic	ce" in these are	as in your cor	nmunity?			
The rental housing market? Example: Refusing to rent based on religion or color.	2	5	1	5	13			
The real estate industry? Example: Only showing properties to families with children in certain areas.	2	5	1	5	13			
The mortgage and home lending industry? Example: Offering higher interest rates only to women or racial minorities.	2	3	3	5	13			
The housing construction or housing design fields? Example: New rental complexes built with narrow doorways that do not allow wheelchair accessibility.	1	5	2	5	13			
The home insurance industry? Example: Limiting policies and coverage for racial minorities.	2	4	2	5	13			
The home appraisal industry? Example: Basing home values on the ethnic composition of neighborhoods.	3	2	3	5	13			
Any other housing services?	1	3	4	5	13			

Table 2.9           Barriers to Fair Housing in the Public Sector           Both							
20	19 Fair Hou		y Data				
Question	Yes	No	Don't Know	Missing	Total		
Are you aware of any impediments or	barriers to	fair housi	ng choice in you	ur community	regarding:		
Land use policies? Example: Policies that concentrate multi-family housing in limited areas.	0	3	2	8	13		
Zoning laws? Example: Laws that restrict placement of group homes.	0	3	2	8	13		
Occupancy standards or health and safety codes? Example: Codes being inadequately enforced in immigrant communities compared to other areas.	0	3	2	8	13		
Property assessment and tax polices? Example: Lack of tax incentives for making reasonable accommodations or modifications for the disabled.	0	3	2	8	13		
The permitting process? Example: Not offering written documents on procedures in alternate languages.	0	3	2	8	13		
Housing construction standards? Example: Lack of or confusing guidelines for construction of accessible housing.	0	3	2	8	13		
Neighborhood or community development policies? Example: Policies that encourage development in narrowly defined areas of the community.	0	3	2	8	13		
Are you aware of any barriers that limit access to government services, such as a lackof transportation, employment, or social services?	1	3	1	8	13		
Are there any other local government actions or regulations in your community that act as barriers to fair housing choice?	0	1	4	8	13		

	6. Fair	Table 2 Housing in Both Fair Housing	n the Public	Sector						
Question	Not at all	Slightly	Moderately	Significantly	Don't Know	Missing	Total			
Hov	w do the facto	rs listed belo	w affect your co	ommunity?						
Access to public transportation to schools, work, health care, services	Access to public transportation to schools, work, 1 0 2 2 0 8 13									
Access to good nutrition, healthy food, fresh vegetables, etc	0	2	1	2	0	8	13			
Access to school choice	1	1	2	1	0	8	13			
Access to proficient Public Schools	1	0	3	1	0	8	13			
Access to parks, libraries, other public facilities	0	1	2	2	0	8	13			
Access to health care	0	1	1	3	0	8	13			
Access to mental health care	0	1	2	2	0	8	13			
Access for seniors and/or people with disabilities to public transportation	0	1	0	4	0	8	13			
Lack of affordable housing	0	1	0	4	0	8	13			
Lack of affordable Public Housing	1	0	0	4	0	8	13			
Lack of acceptance of housing choice vouchers	1	0	2	2	0	8	13			
Access to education about fair housing laws	0	1	1	3	0	8	13			
Gentrification and displacement due to economic pressures	1	0	1	2	0	9	13			
Lack of collaboration between agencies	1	0	1	3	0	8	13			
Other	1	0	0	0	2	10	13			

Table 2.11         7. Fair Housing in the Public Sector         Both         Fair Housing Survey							
Question	Not at all	Slightly	Moderately	Significantly	Don't Know	Missing	Total
Do you believe these issues are hap	opening in you	ur community	/? If so, how mu	ch are the issues	s impacting	your communit	/?
Segregation	1	1	3	0	0	8	13
Concentrations of racial or ethnic minorities	0	0	1	3	0	9	13
Concentrations of poverty	0	0	1	3	0	9	13
Differences in access to housing opportunities							
for people of various income, races, ethnicity, genders, family status	0	0	2	2	0	9	13
Greater share of housing problems for those at lower incomes, of a specific race or ethnicity or national origin, disability, gender, or family status.	0	0	2	2	0	9	13
Challenges for persons with disabilities	0	1	2	1	0	9	13
Lack of housing discrimination enforcement	1	0	1	2	0	9	13
Lack of affordable single-family houses	0	0	3	1	0	9	13
Lack of affordable rental housing	0	0	1	3	0	9	13
Lack of acceptance of housing choice vouchers	0	0	1	1	1	10	13
No or limited education about fair housing laws	0	1	2	1	0	9	13
Gentrification and displacement due to economic pressures	0	1	2	1	0	9	13
Lack of diversity and equity in the School District	0	1	2	1	0	9	13
Other	0	0	0	0	2	11	13

Table 2.12         Federal, State, and Local Fair Housing Laws         Both         2019 Fair Housing Survey Data					
Question	Yes	No	Don't Know	Missing	Total
Are you aware of any fair housing ordinance, regulation, or plan in your community? Are you aware of any policies or practices for "affirmatively furthering fair housing" in your community? Affirmatively	0	1	3	9	13
Furthering Fair Housing meanstaking meaningful actions that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected class.	1	2	1	9	13

## HOUSING NEEDS ASSESSMENT SURVEY DATA: ROME CITY

Table 3.18. What Community do you live in?Rome cityFair Housing Survey		
Community	Number of Respondents:	
Rome city	131	
Utica city	0	
Both	0	
Other	0	
Total	131	

Table 3.29. What is your primary role in the housing industry Rome city Fair Housing Survey			
Role	Total		
Homeowner or Renter	0		
Service Provider	125		
Property Manager	0		
Local Government	0		
Law/Legal Services	1		
Insurance	1		
Construction/Development	1		
Lending/Mortgage Industry	0		
Real Estate Sales/Brokerage	0		
Appraisal	0		
Other	3		
Missing	0		
Total	131		

Table 3.310. Tenure of Respondent?Rome cityFair Housing Survey		
Role	Total	
Homeowner	89	
Renter	37	
Other	0	
Missing	1	
Total	131	

Table 3.411. How familiar are you with FairHousing LawsRome cityFair Housing Survey			
Response Total			
Very Familiar	7		
Somewhat Familiar	31		
Not Familiar	0		
Missing	52		
Total	131		

	Table te, and Loc Rome 19 Fair Housing	al Fair Housing	g Laws		
Question	Yes	No	Don't Know	Missing	Total
Do you thinkfair housing laws serve a useful purpose?	46	5	27	53	131
Do you think fair housing laws are difficult to understand or follow?	15	25	38	53	131
Do you feel that fair housing laws are adequately enforced in your community?	9	12	54	56	131

Table 3.6         Federal, State, and Local Fair Housing Laws         Rome city         2019 Fair Housing Survey Data					
Question	Yes	No	Don't Know	Missing	Total
Outreach and education activities, such as training and seminars, are used to help people better understand their rights and obligations under fair housing law. Are you aware of any educational activities or training opportunities available to you to learn about fair housing laws?	2	55	12	62	131
If you answered "yes" to the previous question, have you participated in fair housing activities or training within the last 12 months?	0	15	4	112	131
Fair housing testing isoften used to assess potential violations of fair housing law. Testing can include activities such as evaluating building practices to determine compliance with Americans with Disabilities Act (ADA) laws or testing if some people are treated differently when inquiring about available rental units. Are you aware of any fair housing testing conducted in your community?	2	55	11	63	131

Table 3.712. If you have received fair housing training, where did you receive training or how did you receive training? Rome city Fair Housing Survey				
Response Total				
Through legal consultant	0			
Online program or webinar	0			
Seminar with company	0			
Discussion topic at meeting	0			
Community Service provider 0				
Other 4				
Missing 127				
Total	131			

Total

Barriers to Fa	air Housi	le 3.8 ng in the ne city	e Private Seo	ctor		
2019 Fair Housing Survey Data						
Question	Yes	No	Don't Know	Missing	Total	
Are you aware of any "impediment	s to fair hou	ising choi	ce" in these area	as in your cor	nmunity?	
The rental housing market? Example: Refusing to rent based on religion or color.	13	34	14	70	131	
The real estate industry? Example: Only showing properties to families with children in certain areas.	13	33	14	71	131	
The mortgage and home lending industry? Example: Offering higher interest rates only to women or racial minorities.	9	34	18	70	131	
The housing construction or housing design fields? Example: New rental complexes built with narrow doorways that do not allow wheelchair accessibility.	8	33	20	70	131	
The home insurance industry? Example: Limiting policies and coverage for racial minorities.	6	32	22	71	131	
The home appraisal industry? Example: Basing home values on the ethnic composition of neighborhoods.	7	31	23	70	131	
Any other housing services?	3	29	24	75	131	

Table 3.9           Barriers to Fair Housing in the Public Sector						
20	Ror 19 Fair Hou	ne city	v Data			
Question	Yes	No	Don't Know	Missing	Total	
Are you aware of any impediments or	barriers to	o fair housi	ng choice in you	ur community	regarding:	
Land use policies? Example: Policies that concentrate multi-family housing in limited areas.	8	31	15	77	131	
Zoning laws? Example: Lawsthat restrict placement of group homes.	7	29	17	78	131	
Occupancy standards or health and safety codes? Example: Codes being inadequately enforced in immigrant communities compared to other areas.	9	30	15	77	131	
Property assessment and tax policies? Example: Lack of tax incentives for making reasonable accommodations or modifications for the disabled.	7	28	19	77	131	
The permitting process? Example: Not offering written documents on procedures in alternate languages.	4	29	21	77	131	
Housing construction standards? Example: Lack of or confusing guidelines for construction of accessible housing.	9	28	17	77	131	
Neighborhood or community development policies? Example: Policies that encourage development in narrowly defined areas of the community.	11	24	19	77	131	
Are you aware of any barriers that limit access to government services, such as a lack of transportation, employment, or social services?	12	28	12	79	131	
Are there any other local government actions or regulations in your community that act as barriers to fair housing choice?	7	20	26	78	131	

	13. Fair	Table 3 Housing in Rome 6 Fair Housing	n the Public	Sector			
Question	Not at all	Slightly	Moderately	Significantly	Don't Know	Missing	Total
Ноч	w do the facto	rs listed belo	w affect your co	ommunity?			
Access to public transportation to schools, work, health care, services	6	12	11	18	6	78	131
Access to good nutrition, healthy food, fresh vegetables, etc	13	12	10	12	6	78	131
Access to school choice	13	8	11	16	5	78	131
Access to proficient Public Schools	13	9	13	11	7	78	131
Access to parks, libraries, other public facilities	15	13	9	10	6	78	131
Access to health care	12	8	14	13	5	79	131
Access to mental health care	6	5	11	19	12	78	131
Access for seniors and/or people with disabilities to public transportation	8	10	10	16	9	78	131
Lack of affordable housing	10	5	11	17	10	78	131
Lack of affordable Public Housing	9	5	7	15	17	78	131
Lack of acceptance of housing choice vouchers	5	4	5	8	31	78	131
Access to education about fair housing laws	6	5	9	12	21	78	131
Gentrification and displacement due to economic pressures	7	6	8	9	23	78	131
Lack of collaboration between agencies	3	5	4	12	29	78	131
Other	4	0	1	2	26	98	131

Table 3.11         14. Fair Housing in the Public Sector         Rome city         Fair Housing Survey							
Question	Not at all	Slightly	Moderately	Significantly	Don't Know	Missing	Total
Do you believe these issues are hap	opening in yo	ur community	/? If so, how mu	ch are the issues	s impacting	your communit	y?
Segregation	15	15	7	6	11	77	131
Concentrations of racial or ethnic minorities	7	15	11	7	13	78	131
Concentrations of poverty	2	16	13	17	5	78	131
Differences in access to housing opportunities							
for people of various income, races, ethnicity, genders, family status	5	9	12	14	13	78	131
Greater share of housing problems for those at lower incomes, of a specific race or ethnicity or national origin, disability, gender, or family status.	5	8	11	16	13	78	131
Challenges for persons with disabilities	4	9	8	14	18	78	131
Lack of housing discrimination enforcement	6	3	6	11	27	78	131
Lack of affordable single-family houses	8	7	10	20	8	78	131
Lack of affordable rental housing	6	4	15	18	10	78	131
Lack of acceptance of housing choice vouchers	3	3	4	8	35	78	131
No or limited education about fair housing laws	3	3	9	12	26	78	131
Gentrification and displacement due to economic pressures	8	6	5	10	24	78	131
Lack of diversity and equity in the School District	13	5	7	11	17	78	131
Other	4	0	0	1	22	104	131

Table 3.12         Federal, State, and Local Fair Housing Laws         Rome city         2019 Fair Housing Survey Data					
Question	Yes	No	Don't Know	Missing	Total
Are you aware of any fair housing ordinance, regulation, or plan in your community? Are you aware of any policies or practices for "affirmatively furthering fair housing" in your community? Affirmatively	0	34	20	77	131
Furthering Fair Housing meanstaking meaningful actions that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected class.	2	34	18	77	131

# HOUSING NEEDS ASSESSMENT SURVEY DATA: UTICA CITY

Table 4.115. What Community do you live in?Utica cityFair Housing Survey			
Community	Number of Respondents:		
Rome city	0		
Utica city	2		
Both	0		
Other 0			
Total	2		

Table 4.216. What is your primary role i industry Utica city Fair Housing Survey	n the housing
Role	Total
Homeowner or Renter	0
Service Provider	1
Property Manager	0
Local Government	0
Law/Legal Services	0
Insurance	0
Construction/Development	0
Lending/Mortgage Industry	0
Real Estate Sales/Brokerage	0
Appraisal	0
Other	0
Missing	0
Total	2

Table 4.317. Tenure of Respondent?Utica cityFair Housing Survey			
Role	Total		
Homeowner	2		
Renter	0		
Other	0		
Missing	0		
Total	2		

Table 4.418. How familiar are you with FairHousing LawsUtica cityFair Housing Survey						
Response Total						
Very Familiar	1					
Somewhat Familiar	0					
Not Familiar	0					
Missing	1					
Total	2					

Table 4.5         Federal, State, and Local Fair Housing Laws         Utica city         2019 Fair Housing Survey Data							
Question	Yes	No	Don't Know	Missing	Total		
Do you think fair housing laws serve a useful purpose?	1	0	0	1	2		
Do you think fair housing laws are difficult to understand or follow?	1	0	0	1	2		
Do you feel that fair housing lawsare adequately enforced in your community?	0	1	0	1	2		

Table 4.6         Federal, State, and Local Fair Housing Laws         Utica city         2019 Fair Housing Survey Data							
Question	Yes	No	Don't Know	Missing	Total		
Outreach and education activities, such as training and seminars, are used to help people better understand their rights and obligations under fair housing law. Are you aware of any educational activities or training opportunities available to you to learn about fair housing laws?	0	1	0	1	2		
If you answered "yes" to the previous question, have you participated in fair housing activities or training within the last 12 months?	0	0	0	2	2		
Fair housing testing isoften used to assess potential violations of fair housing law. Testing can include activities such as evaluating building practices to determine compliance with Americans with Disabilities Act (ADA) laws or testing if some people are treated differently when inquiring about available rental units. Are you aware of any fair housing testing conducted in your community?	0	1	0	1	2		

Table 4.719. If you have received fair housing training, where did you receive training or how did you receive training? Utica city Fair Housing Survey							
Response Total							
Through legal consultant	0						
Online program or webinar	0						
Seminar with company	0						
Discussion topic at meeting	0						
Community Service provider	0						
Other 1							
Missing	Missing 1						
Total	2						

Table 4.8         Barriers to Fair Housing in the Private Sector         Utica city         2019 Fair Housing Survey Data								
Question	Yes	No	Don't Know	Missing	Total			
Are you aware of any "impediments	to fair hou	using choic		U U	nmunity?			
The rental housing market? Example: Refusing to rent based on religion or color.	1	0	0	1	2			
The real estate industry? Example: Only showing properties to families with children in certain areas.	1	0	0	1	2			
The mortgage and home lending industry? Example: Offering higher interest rates only to women or racial minorities.	1	0	0	1	2			
The housing construction or housing design fields? Example: New rental complexes built with narrow doorways that do not allow wheelchair accessibility.	1	0	0	1	2			
The home insurance industry? Example: Limiting policies and coverage for racial minorities.	1	0	0	1	2			
The home appraisal industry? Example: Basing home values on the ethnic composition of neighborhoods.	1	0	0	1	2			
Any other housing services?	1	0	0	1	2			

Table 4.9           Barriers to Fair Housing in the Public Sector           Utica city									
2019 Fair Housing Survey Data									
Question	Yes	No	Don't Know	Missing	Total				
Are you aware of any impediments of	r barriers to	fair housi	ing choice in you	ir community	regarding:				
Land use policies? Example: Policies that concentrate multi-family housing in limited areas.	0	1	0	1	2				
Zoning laws? Example: Laws that restrict placement of group homes.	1	0	0	1	2				
Occupancy standards or health and safety codes? Example: Codes being inadequately enforced in immigrant communities compared to other areas.	1	0	0	1	2				
Property assessment and tax policies? Example: Lackof tax incentives for making reasonable accommodations or modifications for the disabled.	0	1	0	1	2				
The permitting process? Example: Not offering written documents on procedures in alternate languages.	0	1	0	1	2				
Housing construction standards? Example: Lack of or confusing guidelines for construction of accessible housing.	0	1	0	1	2				
Neighborhood or community development policies? Example: Policies that encourage development in narrowly defined areas of the community.	0	1	0	1	2				
Are you aware of any barriers that limit access to government services, such as a lack of transportation, employment, or social services?	0	0	0	2	2				
Are there any other local government actions or regulations in your community that act as barriers to fair housing choice?	0	0	0	2	2				

Table 4.10         20. Fair Housing in the Public Sector         Utica city         Fair Housing Survey								
Question	Not at all	Slightly	Moderately	Significantly	Don't Know	Missing	Total	
Hov	w do the facto	rs listed belo	w affect your co	ommunity?				
Access to public transportation to schools, work, health care, services	0	0	0	1	0	1	2	
Access to good nutrition, healthy food, fresh vegetables, etc	0	0	0	1	0	1	2	
Access to school choice	0	0	0	1	0	1	2	
Access to proficient Public Schools	0	0	0	1	0	1	2	
Access to parks, libraries, other public facilities	0	0	0	1	0	1	2	
Access to health care	0	0	0	1	0	1	2	
Access to mental health care	0	0	0	1	0	1	2	
Access for seniors and/or people with disabilities to public transportation	0	0	0	1	0	1	2	
Lack of affordable housing	0	0	0	1	0	1	2	
Lack of affordable Public Housing	0	1	0	0	0	1	2	
Lack of acceptance of housing choice vouchers	0	1	0	0	0	1	2	
Access to education about fair housing laws	0	0	0	1	0	1	2	
Gentrification and displacement due to economic pressures	0	1	0	0	0	1	2	
Lack of collaboration between agencies	0	0	0	1	0	1	2	
Other	0	0	0	0	0	2	2	

Table 4.11         21. Fair Housing in the Public Sector         Utica city         Fair Housing Survey							
Question	Not at all	Slightly	Moderately	Significantly	Don't Know	Missing	Total
Do you believe these issues are hap	opening in yo	ur community	y? If so, how mu	ch are the issues	s impacting	your communit	y?
Segregation	0	0	0	1	0	1	2
Concentrations of racial or ethnic minorities	0	0	0	1	0	1	2
Concentrations of poverty Differences in access to housing opportunities	0	0	0	1	0	1	2
for people of various income, races, ethnicity, genders, family status	0	0	0	1	0	1	2
Greater share of housing problems for those at lower incomes, of a specific race or ethnicity or national origin, disability, gender, or family status.	0	0	0	1	0	1	2
Challenges for persons with disabilities	0	0	0	1	0	1	2
Lack of housing discrimination enforcement	0	0	0	1	0	1	2
Lack of affordable single-family houses	0	0	0	1	0	1	2
Lack of affordable rental housing	0	0	0	1	0	1	2
Lack of acceptance of housing choice vouchers	0	0	0	1	0	1	2
No or limited education about fair housing laws	0	0	0	1	0	1	2
Gentrification and displacement due to economic pressures	0	0	0	1	0	1	2
Lack of diversity and equity in the School District	0	0	0	1	0	1	2
Other	0	0	0	1	0	1	2

Table 4.12         Federal, State, and Local Fair Housing Laws         Utica city         2019 Fair Housing Survey Data							
Question	Yes	No	Don't Know	Missing	Total		
Are you aware of any fair housing ordinance, regulation, or plan in your community? Are you aware of any policies or practices for "affirmatively furthering fair housing" in your community? Affirmatively	0	0	0	2	2		
Furthering Fair Housing means taking meaningful actions that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected class.	0	0	0	2	2		

#### Service Providers and Advocates

#### Presentation

**Presenter:** Does anyone have any comments on what they find the barriers are to accessing housing in your communities? You are welcome to the type an answer question if you're more comfortable, and I could read that out loud.

**Comment:** Okay, so I think from from our point of view, where we're embedding the Community Schools Initiative in Rome, so we speak to a lot of families and assist a lot of families with resources and, and services that they're needed. And certainly housing is a big hurdle for many of our families. I do believe we have seen trends that are our Spanish speaking families really struggle to find housing for a number of reasons, due to language barriers. And due to a hub of where the house where housing listings are, are listed in a in their appropriate language. I think that's certainly been a trend we've certainly helped with, we have helped with interpreters to negotiate with landlords. We also have seen what we believe are some predatory landlords in the area that we've been very cautious to have some of our families rent from so, so I guess that that's what kind of comes to mind when you say, you know, assessing or accessing housing, or if there's groups of people that are struggling with that, so, so that's what I'm seeing.

**Presenter:** Right, thank you, um, when you were talking about, you know, predatory landlords, is it, you know, asking for, you know, kind of outrageous down payments or things like that, in what way?

**Comment:** So, both and not to, you know, being cautious of confidentiality, certainly for some families, but we have had to report to appropriate authority, CPS and such that we did have landlords that were asking under age, children to work, work for the rent. We do believe that we had come across a couple of families who were be at work who were asking for, you know, sexual favors or something in lieu of rent. And with a vulnerable population that doesn't speak, necessarily the same language, or is coming from a situation that may have been traumatizing to them, and they feel very vulnerable. I think that opens it up to a lot of possibilities of, of some shady business.

**Presenter:** Thank you for your comments. I have a question here. (Comment) As a Latino agency, we know that these barriers, my question is, what are the city representatives doing about these issues? And I can, you know, there's, I think we have a couple people from the City of Rome or Utica on the line and if they would like to jump in and answer that's great, but I will just say that that is part of the, the reason for this, we can help we can identify these issues, and then we can help craft, how the city can address those issues. So if anyone on the line, like to jump in from either city, please do so. But we'd also like to hear from, you know, other participants, recommendations how we can address these issues in our community. (Comment) From the City of Rome, after effects of repeat the question, the question is that I'll read it just don't read it again. As Latino agency, we know many of these barriers. My question is, what are the city representatives doing about these issues?

**Comment:** All right. So so right, the Analysis to Impediments is what we're undertaking right now and that's the reason for this phone call and outreach. So thanks, everybody, for joining. What we, what we are going to be doing moving forward with all of our HUD CDBG entitlement funding program, annual program is we will be conducting direct outreach to the Spanish Latino community and the black community through, you know, going above and beyond what we would normally do for the required citizen participation annually. So we will be direct, we will be

conducting direct outreach. We're going to start with several churches that we do know and we will, we'll be working with the NAACP, the local chapter of the NAACP, to start collecting more meaningful suggestions and data from from those particular communities. So this is the first step in a series of, you know, bolstered outreaches to to those populations.

Presenter: Thank you.

**Comment:** And also this. So this is kind of a this is a plan that needs to be updated every 10 years for for CDBG and Hud communities. So this is a this is an update to the when was the last one last updated? 2000?

**Presenter:** 2012, I think it's what's coming to my mind.

**Comment:** 2008. So the last this last time was updated in 2008. So they're normally updated every 10 years, or every two every two Census. So we're at the point where we're looking for, for suggestions. Moving forward to craft an assembly into our annual our annual plans. The City of Rome just undertook its five year Consolidated Plan process as an entitlement community, so each each year we'll be looking at adding specific projects to to our list. So this, this updated AI is really going to help us steer, steer the CDBG direction as far as housing goes, and, again, we'll be we'll be doing direct outreach to to those populations that we talked about Spanish Latino, black and we also have in our office information, informational panels, pamphlets for landlord and ten ants' rights guide guidebooks in both English and Spanish. So you can get those up in up in the third floor of City Hall in Rome. You just need to ask somebody at the front desk when City Hall opens back up, and we can direct you to that information, I think I believe it's also on our CDBG webpage, the tenants' rights and landlords guides.

**Presenter:** Thank you. (Comment) That the language barrier is a huge issue in this community. And as the main reason clients reach out to my agency, whether it is to complete the MHA application, DSS and or other forms. Thank you for your comments there. Are there any other comments or questions or recommendations on how the city can address? (Comment) What is the window for making input into this process. So we are in this stage, still collecting data and then we will have a draft report and that draft report will be coming out sometime in the next few weeks and that report will be available for a 30 day comment period. So you know, we still have a couple months left in the process, you have a chance to review the document and we'll have another public meetings where you can comment on the document then. Or I'll also at the end of this presentation, give you the email addresses for Matt Andrews, at the City of Rome, and Brian Thomas at the City of Utica, where you can send them any comments that you have as well. (Comment) Will you be reaching out to the NAACP Utica chapter also? Um, that's not something that we have done, but we thank you for the suggestion and we can certainly look into that. Any other comments or questions?

**Comment:** I just wanted to note that even even though this, this plan has been crafted jointly between the two, two municipalities is one metro area. So the City of Utica and City of Rome as entitlement communities are joining forces for this Analysis to Impediments to Fair Housing. But each community has its own responsibility to craft its five year Consolidated Plan, Annual Action Plans separately, so and I do know that Utica is a usually is a recipient of more than just CDBG. Entitlement funding, so they do have HOME program funding that they use as well. But I'm not sure what their what their outreach and citizen participation plan and goals are. But just just to note that this, the City of Rome, in its Community Participation Plan will be doing direct outreach to the NAACP, and in those groups noted before and I don't want to speak for the City of Utica, what was

their, what their methods of outreach include? Thank you. Any other questions or comments or recommendations for the cities?

#### Presentation

**Presenter:** Well, thanks To thank all of you for taking time out of your busy day to be with us. (Comment) I would like to see more transparency on how CDBG is spent, the reports usually lump spending in the categories. I'm sure Matt can clarify for you. The Annual Action Plan will typically show where funding is going for each project. And I will have a description of the project, the CAPER, the Consolidated Annual Performance and Evaluation Report is a little bit trickier to read, because you are right, it does lump it into categories or goals of how those are being addressed address. But I think if you look at the Annual Action Reports that come out every year, there'll be specific projects and descriptions and how much money is being spent on each. (Comment) It seems to me that a major roadblock to good and fair housing, is what good paying meaningful jobs, what the Cities of Rome and Utica could doing to address the real possibility of employment discrimination. Did you want to answer that question?

**Comment:** Sure. So as far as employment discrimination goes, and the city's ability to curtail some of the some of those, some of those issues; we do work is as an entitlement community, some of the public service funding that we receive annually, does go to service providers in the area that that deal with people who live in the city within the City of Rome municipal boundary limits. So some, some of the CDBG money annually goes to workforce development agencies, which in you know, they have job force training, and other opportunities through their organizations that people can take advantage of beyond CDBG funding, and in the support that the City of Rome gives to service organizations for employment in the area, the community has been working pretty hard over the past, you know, 15/20 years on, on building, building the jobs within the city, and as of recently, you know, namely, the distribution facility that is building right now on the tech park, you know, there'll be close to 250 new jobs in the area for people to take advantage of that don't require specialized training for those jobs. So, you know, that's a, that's a big boost to the job market, in the, in the City of Rome, that that doesn't require, you know, any degree or specialized training for and when we want to, you know, obviously continue those those opportunities of growth. And it specifically in the in the jobs sector that doesn't require specialized training pending, there's, there's definitely a ton of available positions that do require specialized training on the business park, but we we understand that, you know, there's there's importance to both the specialized and non-specialized jobs.

**Presenter:** (Comment) You asked if I can make this presentation available. And yes, I'd be happy to email it out to all of our participants, then I don't know if the city's like to send it to them. If they want to post it on their website, they can do that as well. Are there any other questions or concerns, recommendations that you'd like to share? All right, well, thank you so much for your time today. Again, if you do have comments later, you can email them to Matt Andrews or Brian Thomas, their email addresses here. fantastic to have you participate in this process. And I hope you have a great rest of your day and a great week. Thank you.

Developers and Financial Institutions Focus Group

#### Presentation

**Presenter:** We had a focus group that took place earlier this afternoon. And a lot of the comments that we received were about, you know, there being a language barrier for our Spanish speaking population, in accessing housing and avoiding predatory landlord. Does anyone agree with that or disagree with that?

Comment: I have a quick question. Do you know how many participants are on here?

**Presenter:** We only have five right now. You and Ashley from the city. And then we have three other participants, one of the other participants from the city as well, two other participants who are not city employees.

**Comment:** So I'm wondering if the other participants are financial institution representatives and I wonder if if they are if either of them could talk about some of the some of the issues that they see with with mortgage applications and some of the the trends that were showing on some of those graphs about, you know, some of the some of the minority groups not being as successful as, as non-Hispanic whites through the mortgage process. If they're not financial institution representatives, we would love to hear what, you know what they had to say, as well. But I'm just wondering if there's any representatives from financial institutions on there that obviously can't give detailed information, but maybe they can, maybe they can add to the discussion a little bit.

**Presenter:** Well, what's coming up next. If you too, want to chime in, please let me know. And we're continuing to collect data. And we have other public input opportunities coming up. Again, if you haven't completed that survey, I would really encourage you to do that and then there'll be a 30 day public review period. If you do have comments that maybe you'd rather share via email, you can email Matt Andrews from the City of Rome, or Brian Thomas at Utica. But you know, if you would like to comment, we would appreciate that. All right. Well, thank you so much for taking time out of your day to be with us today. Again, if you do think of something later, please shoot us an email and we'll we'll make sure to include that in the plan as well. Thank you.

## City of Rome Fair Housing Public Input Meeting

## Presentation

**Presenter:** (Comment) We have a question does the data include prisoners in the data sets and the Census tracks there is one data set in the United States Census that tracks institutionalized population. So that would be available, I mean, we do include that one institutionalized and non-institutionalized population. If you go back or think back to that very first slide where we saw a decrease in population, those estimates and do include institutionalized population, um, you know, as as the estimates, and also, the 2010 Census would as well 2018, probably not as much. But we do have some information on institutionalized populations in correctional facilities. The actual HUD data probably depends on, it depends on where those where the prisoners would be located. I would assume that it would probably be non-institutionalized population. So I would say the HUD data probably does not account for for prisoners, but some of the some of the Census data actually does. So I hope that helped your question. We can dig a little bit more on the on on that as well.

### Presentation

**Presenter:** (Comment) Aside from the mortgage data, one of the maps showed a high concentration of minorities and a track where several jails and prisons are located. Okay. That's a good question. Yeah, that probably does include, so we would map population, the Census track population, I will take a look at that and make sure, yes, so we had a, we had a question based on a map. If the Census tract population includes institutionalized correctional facilities. I will check on that, and then figure that out. Yeah, I'm assuming because it's a P, you know, that's the P one estimate, or whatever. So that's the top level total population. Um, I just can't remember off the top of my head, if that necessarily includes non-institutionalized, kind of like with, you know, if you, if you're racing ethnicity, you're either non-institutionalized or institutionalized. I just have to check the full sample size and I can do that in just a second. And maybe after you're kind of room when we wrap up the presentation, I can pop in, and I have a good idea where to look for that, but good question. Yes, again, you know, blacks had 100% mortgage denial rate in 2010. Yes, that's according to this data, but it's probably such a small sample size, we'd have to actually dig into look at the numbers to see about that, you know, it's, whenever I see data that jump from zero to 100, back down to zero, that never, that normally means there's just a small sample size, so you get a lot of variability in the data. But yes, according to this in 2010, we did see 100% denial rate dropping down to zero, then 25%, and 22. So that's why, you know, when you have this kind of data, with large variability year to year, it's helpful just to look at the jurisdictional average, or the, you know, the average over the time period 2008 to 2018. And we do see here, this kind of smooths out the sample size variability and also allows for the, you know, the loan count, to get higher to kind of smooth things out. So we do see here 22% versus 11.7%, so much a much higher loan denial rate. Um, you know, so that's just what the data say, you know, as a, you know, I have I have traveled around the country and done this for a lot of cities, states, counties, you name it. I've done it, and I've looked at this data, and this trend exists almost everywhere, unfortunately. So it's not necessarily something that's specifically happening in Rome. City of Rome. It is happening. I mean, based on the data we do, rate, but it also happens nationwide, and in most jurisdictions that I see the only, you know, also, yes. So that's just something to put in context as well.

#### Presentation

**Presenter:** (Comment) I wanted to ask, again, if the segregation has anything to do with institutions? Um, yes, that's a good question. And I will make sure that we get to the bottom of that. Yes, that's a great question. And we will address out I'll dig in after this presentation to be able to answer that for you.

## Presentation

Presenter: (Comment) What does the city have to do to address some of this? Okay, that's, that's a great question. So we do see that there is a lot of, you know, there are some issues that are popping out, um, the city technically doesn't necessarily, as far as I can understand, you know, doesn't have to go out and like move people or do anything like that. It's, it's, they have to affirmatively further or certify that they are furthering fair housing, which is this part of the process, you know, and then they have to come up with a bit of a, like a plan to address this. And that could include, you know, additional outreach and education, to make sure people are aware of this to know about what, what issues and what, what opportunities, they have to get involved in fair housing or learn about fair housing. So, you know, you can do that by webinars or classes and things like that, or, you know, putting out flyers. It's kind of up to the city based on what is found in this analysis and also what is found in the, and found within the preliminary findings, they can absolutely work with organizations within the city. So another question. (Comment) What does the city have to do to address some of this? Can they work with organizations within the city? Yes, absolutely. They sure can. And we certainly encourage that, at least, you know, this is the beginning of a conversation about about a very difficult and tricky issue. So the more you know, the more stakeholders and buy in we have from the public and certainly organizations within the city is would be absolutely great to have so um, you know, what do they have to do is different, and then you know, what can they do? So, you know, and they can certainly work with organizations within the city to take care of it or dress or meet some of these needs, you know, in the Final Report alongside of all of these various preliminary and small points here, there's a big table at the very beginning of the document. And at the end, there will be a big table that identifies these needs, and then the actions to address those needs. And certainly, you know, and how and how you will go about responding to those needs. So, you know, working with organizations within the city is a great way to accomplish that. So, yes, yes. So, I hope, I hope that helps answer answer your question.

## Presentation

**Comment:** I just wanted to add something to the conversation of what the city can do to help further fair housing so just just so that everybody has kind of an idea on the line right now of what the city has been doing to try to further fair housing in the past 10 plus years, since I've been at the city, I just have a short, short kind of bullet list. So you can kind of get ideas of the measures the city's been taking, based on the old Analysis to Impediments. So the city has a Fair Housing Officer, she works out of the Office of Community and Economic Development right now, which is our office. If somebody does have a housing issue, they can call the office and she would put them in touch with the Regional Coordinator in Syracuse. We maintain records of tenant/landlord rights guides book guidebooks, out of the office, both in Spanish and English. The City Code Enforcement Department regularly has housing inspections and, and fire fire safety inspections for multi-unit buildings. So, you know, the landlords are not just, you know, leaving their quarters unsafe for their tenants The city has, has some ownership over enforcement of the regulations for the housing units. With CDBG. We do have a public service program that is offered annually to nonprofit organizations to help low to moderate income populations in the city. Some of those services include housing support services, workforce development, aging in place services. So ADA upgrades to some housing units. We have been working with the Homeownership Center in Utica

to continue Ramps and Rails Program, which is an accessibility program, a residential rehab program, that that we've been trying to pile in here for the past year and a half. Dealing with dealing with blighted properties within the target area. A lead paint program that the city did did assist with several years ago, we're looking to partner again with the Homeownership Center in launching a lead paint program along with a rehab program. We're going through this AI process update. So it'll identify you know, more, more action items that the city can take and kind of hone in on you know what the problems are and what the solutions to this problem for to the problems. could potentially be. So, is it is it better dissemination of information on on local bank banks and financial institutions for mortgages is that, you know, understanding better the actual tenants' rights and getting that information more out to the public more regularly. And an access to jobs through bus, bus transportation, and in transit were important of the city invested heavy amount of money through the Downtown Revitalization Initiative in a Central Transfer Station for or for transit. And then again, like you know how best to deal with a housing problem, then promote job creation and retention area. And I think that the, you know, the plant at Griffins Business and Technology Park with another 230 plus jobs that weren't in the community, I think that, that'll help, you know, that couldn't hurt. So the city always is, is promoting economic development and trying to further those, those economic development initiatives, whenever possible. So thanks. I just wanted to kind of hit it a little list of kind of what the city has been working on to deal with some fair housing issues.

**Presenter:** Yeah, that's great. That was that was very helpful. Thank you so much.

## City of Utica Fair Housing Public Input Meeting

No Comments

Hello Mr. Gaudin,

I attended the Cities of Rome and Utica Fair Housing Focus Group webinar. It was very informative and helpful. I thought that I had copied the slides of statistics to my desktop but I'm missing the one that gives Utica's population breakdown by race and/or ethnicity. Is it possible for that to be forwarded to me?

Also I would like to advocate for a portion of CDBG funding to be a set-a -side, specifically for infrastructure/ business development (business incubators) and housing support for poor people and people of color directly within the entitlement communities.

Historically marginalized and disenfranchised people, communities and businesses cannot compete for funding opportunities, as if on a level playing field with businesses and organizations that have decades, and sometimes centuries of business experience. We need an opportunity to gain those experiences.

Please let me know when the preliminary report is released, and the 30 day window for review and comment.

Freddie Hamilton