Jefferson County, Alabama

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Submitted to the U.S. Department of HUD

Jefferson County Commission

Department of Community and Economic Development

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Jefferson County, Alabama Analysis of Impediments to Fair Housing

Executive Summary

Although there is no statutory definition of Affirmatively Furthering Fair Housing (AFFH), HUD defines it as (1) conducting analysis to identify impediments to fair housing choice within the jurisdiction; (2) taking appropriate actions to overcome the effects of any impediments identified through the analysis; (3) and maintaining records reflecting the analysis and actions taken in this regard.

To that end, the Jefferson County Department of Community and Economic Development's Analysis of Impediments to Fair Housing was accomplished by analyzing housing data and consultation with public housing agencies such as the Jefferson County Housing Authority, Fair Housing Center Northern Alabama, United Way of Central Alabama, Gateway and the county's HUD Advisory Council.

The information and data analyzed revealed the following Impediments to further fair housing choice:

- Cost Burden for lower income persons who do not have the financial resource to maintain existing housing.
- Citizens' lack of education concerning their rights under the Fair Housing Act.
- Citizens' lack of training and understanding in the mechanics, procedures and requirements of the current generation of Financial Institutions, sellers and landlords.
- Citizens' lack of knowledge in such areas as financial management and credit stability.
- The virtual impossibility of the private sector to provide either non-subsidized rental or ownership opportunities to those within the 80% of median income range.
- Inadequate housing for the low, very low and extremely low income elderly.
- Lack of Section "8" Vouchers and Certificates, which limits housing options for lower income households.
- Lack of accessible housing, both owner and rental, for those with disabilities.
- Limitations of public transit transportation routes, thus decreasing the options of transit dependent lower income households.
- Jefferson County's Workforce Development Office not being fully integrated in the Comprehensive One Stop Career Center, which has a negative impact on Adult and Dislocated Workers employment opportunities.
- Accessibility for senior citizens and lower income person who are disabled.

Following this section is the plan of action to address the impediments identified above in order to further affirm fair housing choice for the citizens in the Jefferson County HUD Entitlement Consortium.

Finally, the oversight, monitoring and maintenance record is presented.

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Analysis of Impediments to Fair Housing for Jefferson County Community and Economic Development Department

Introduction

Although there is no statutory definition of Affirmatively Furthering Fair Housing (AFFH), HUD defines it as (1) conducting analysis to identify impediments to fair housing choice within the jurisdiction; (2) taking appropriate actions to overcome the effects of any impediments identified through the analysis; (3) and maintaining records reflecting the analysis and actions taken in this regard.

To that end, the Jefferson County Department of Community and Economic Development's Analysis of Impediments to Fair Housing was accomplished by analyzing housing data and consultation with public housing agencies such as the Jefferson County Housing Authority, Fair Housing Center of Northern Alabama, United Way of Central Alabama, Gateway and the county's HUD Advisory.

The information used to assemble the Analysis of Impediments to Fair Housing, which will be referred to in the body of the report as "AI", first addresses the community profile for Jefferson County and the Jefferson County HUD Entitlement Consortium. This section addresses the county's population; concentration of minority groups; and identification of concentrations of low income families.

Second, the AI examines Jefferson County's local economy by focusing on how employment skill sets affect wages, which impacts the ability to own a home. This section also forecasts new employment opportunities in Jefferson County and how the county will work to improve employment opportunities.

Third, the AI analyzes housing data in Jefferson County. This section will provide an overview of housing in the Jefferson County Consortium; housing conditions of occupied housing units; and new home constructed in 2014.

Fourth, the AI will address disproportionate housing needs to include greater housing needs and severe housing problems.

Fifth; the AI addresses cost burden and this section will focus on income data; maintenance of homes and cost burden by race and ethic group.

Sixth, the AI will address public transportation and its impact on fair housing.

Seventh, the AI will address Home Mortgage Disclosure Act or HMDA data to examine the lending practices of financial institutions in Jefferson County.

Eight, the AI examines the patterns of occupancy in Section 8 as it relates to public and assisted housing and private rental housing. This section will also examine the availability of Section 8 vouchers.

Ninth, the AI presents a need assessment of Section 504 compliance in the Jefferson County Consortium.

Tenth, the AI examines the housing availability for persons with special challenges.

Eleventh, the AI examines Jefferson County's Zoning and Land Use policies. This section will be followed by a brief overview of Jefferson County's property taxes in order to determine whether or not the taxes pose a housing impediment.

Next, the Al presents a summary of impediments identified from the analysis to include a corrective action plan and concludes with a monitoring plan designed to assure fair choice in housing.

Jefferson County Demographic Profile

Jefferson County Population Data

According to the 2010 Census data, the population for Jefferson County is 658,466. There was a decline in the population since 2000 by 3,463 or -0.52%.

The 2010 Census states the white population in the county was 349,166. This represents a decline in the White population by 35,359 or 9.2%. The decline is attributed to out migration into counties in the Central Region of Alabama.

The 2010 Census further states the Black or African American population in Jefferson County was 276,525. This was an increase in population from the 2000 Census by 15,917or 6.11%. According to Amelia Stouhower, an Economist at Auburn University's Community and Economic Institute, research shows minorities are moving to urban areas from rural counties.

The 2010 Census data also states the Asian population was 9,158, which was an increase of 3,191 or 53.48% since the 2000 Census. This increase is believed to be attributed to new industry in the metropolitan area such as Mercedes Benz and its automobile suppliers, as well as other businesses from Asia operating in the Central Region of Alabama.

The 2010 population for American Indians and Native Hawaiians and other Pacific Natives is 1,740. This is an increase in population by 332 or 23.58% since the 2000 Census.

Two (2) or more races, which are persons not identifying themselves to one (1) race, had a 2010 population of 7,275, which was an increase from the 2000 Census by 1,949 or 36.59%.

Finally, there was a 2010 population of 14,358 persons who identified themselves as some other race. This was an increase in population of 10,451 or 267.4%.

Note: See Appendix A, Population Census Tract Map.

Identification of Concentrations of Minority Groups

Based upon the 2000 Census, the population of Jefferson County as a whole was 58.1% White, 39.34% African-American and 2.56% other races. Most of the African-American population lives in Birmingham and Bessemer.

Between 2000 and 2010 there was a significant realignment of population within the County by race. The Jefferson County population declined to 658,456 in year 2010 for a decrease of less than 1.0%. The

minority population increased from 39.4%, in 2000, to 42%, in 2010, of the total population. The White population decreased from 58.1% to 53% of the total population.

Breakdown of racial or ethnic groups located in specific areas or neighborhoods

The cities of Brighton, Center Point, Fairfield, Lipscomb, Midfield, and Tarrant have concentrations greater than 50% of Black or African American residents.

Identification of Concentration of Hispanic Households

The Hispanic population in Jefferson County rose from 2,754 in 1990 to 25,488 in 2010. While most jurisdictions have some Hispanic residents, the Consortium areas with the greatest concentrations (raw numbers) are Brighton, Lipscomb, Vestavia, Homewood, Irondale, Leeds, Tarrant and Fultondale. The areas with the highest percentage of Hispanic population are Brighton, Lipscomb and Fultondale. The Hispanic population within the City of Lipscomb is the highest percentage (19.73%) within the Consortium

Table I

| Incorporated Area & Counties | 2010 Census | 2010 Hispanic | 2010 Hispanic % of total |
|------------------------------|-------------|---------------|--------------------------|
| | Population | Population | |
| Jefferson Co | 658,466 | 25,488 | 3.87% |
| Shelby Co | 195,085 | 11,567 | 5.93% |
| Blount Co | 57,322 | 4,626 | 8.07% |
| St. Clair Co | 83,593 | 1,716 | 2.05% |
| Adamsville | 4,522 | 102 | 2.26% |
| Bessemer | 27,456 | 1,113 | 4.05% |
| Birmingham | 212,237 | 7,704 | 3.63% |
| Brighton | 2,945 | 407 | 13.82% |
| Brookside | 1,363 | 9 | 0.66% |
| Center Point | 16,921 | 806 | 4.76% |
| Clay | 9,708 | 127 | 1.31% |
| Fairfield | 11,117 | 127 | 1.14% |
| Fultondale | 8,380 | 909 | 10.85% |
| Gardendale | 13,893 | 207 | 1.49% |
| Graysville | 2,165 | 37 | 1.71% |
| Homewood | 25,167 | 1,846 | 7.34% |
| Hoover | 81,619 | 4,915 | 6.02% |
| Hueytown | 16,105 | 321 | 1.99% |
| Irondale | 12,349 | 961 | 7.78% |
| Kimberly | 2,711 | 22 | 0.81% |
| Leeds | 11,773 | 774 | 6.57% |
| Lipscomb | 2,210 | 436 | 19.73% |

| Midfield | 5,365 | 77 | 1.44% |
|----------------|--------|-----|-------|
| Morris | 1,859 | 20 | 1.08% |
| Mt. Brook | 20,413 | 198 | 0.97% |
| Mulga | 836 | 5 | 0.60% |
| North Johns | 145 | | 0.00% |
| Pinson | 7,163 | 267 | 3.73% |
| Pleasant Grove | 10,110 | 57 | 0.56% |
| Tarrant | 6,397 | 578 | 9.04% |
| Trafford | 646 | 6 | 0.93% |
| Trussville | 19,933 | 250 | 1.25% |
| Vestavia Hills | 34,033 | 835 | 2.45% |
| Warrior | 3,176 | 25 | 0.79% |

Note: See Appendix B, Minority Census Tract Map.

Identification of Areas of Concentration of Low-income Families

Jefferson County is an Urban County as defined by HUD. The Jefferson County HUD Entitlement Consortium includes all of Jefferson County with the exception of Birmingham, Hoover, Bessemer, Sumiton, Argo, County Line, and Helena. All housing programs (CDBG & HOME) are defined as 'direct beneficiary' activities where each beneficiary must be low/mod income. Concentrations of low and moderate income residents are outlined below by Census Tracts.

Table II

| TRACT | BLOCK GROUP | LOW-MOD PERCENT | |
|--------|-------------|-----------------|--|
| 010002 | 2 | 51.5 | |
| 010401 | 5 | 65 | |
| 010402 | 1 | 52.8 | |
| 010500 | 1 | 60.4 | |
| 010500 | 2 | 64.3 | |
| 010602 | 1 | 72 | |
| 010602 | 3 | 77 | |
| 010602 | 5 | 59.1 | |
| 010602 | 6 | 55.9 | |
| 010900 | 3 | 52.1 | |
| 010900 | 5 | 79 | |
| 010900 | 6 | 63.3 | |
| 010900 | 7 | 62.1 | |
| 010900 | 9 | 71.8 | |
| 011400 | 1 | 61.2 | |
| 011500 | 2 | 53.3 | |
| 012002 | 1 | 52.2 | |
| 012002 | 2 | 58.4 | |
| 012402 | 1 | 53.8 | |

| 012403 | 2 | 82.3 |
|--------|---|------|
| 012500 | 1 | 51.2 |
| 012500 | 2 | 59.1 |
| 012602 | 1 | 51.4 |
| 012602 | 2 | 60.1 |
| 013200 | 2 | 58.4 |
| 013200 | 3 | 66.9 |
| 013300 | 1 | 68.2 |
| 013300 | 2 | 65.4 |
| 013300 | 3 | 74.2 |
| 013400 | 2 | 54.7 |
| 013601 | 1 | 56.7 |
| 013601 | 2 | 77.8 |
| 013601 | 3 | 63.2 |
| 013601 | 5 | 58.8 |
| 013801 | 1 | 61.3 |
| 013801 | 2 | 55.6 |
| 013901 | 1 | 56.2 |
| 014102 | 3 | 52.8 |
| 014104 | 2 | 53.8 |
| 014301 | 3 | 56.1 |
| | | |

Note: See Appendix C, Medium Household Income Census Tract Map.

Jefferson County Economic Analysis

Being able to afford housing is directly linked to income capacity. Income capacity is linked in most cases to employment skill level. Persons with higher employment skill level tend to earn higher wages, which leads to home ownership and the ability to maintain the home. With the economy being in a recovery mode employment opportunities are increasing nationally, as well as locally.

According to the Alabama Department of Labor, the unemployment rate in Jefferson County as of June 2015 is 5.8%. The major employment sectors in Jefferson County include Arts, Entertainment, Accommodations, Education and Health Care Services, Finance and Real Estate, and Professional, Scientific, and Management Services.

The high demand occupations in the county include welders, truck drivers, industrial machinist, HVAC technicians, electricians, Registered Nurses, LPNs, Patient Care Technicians, and Certified Nursing Assistants.

Forecast of New Employment Opportunities

There are four (4) new hotels that will be constructed over the next few years. Two (2) of the hotels will be constructed by Hilton and two (2) will be constructed by Marriott. These projects will create construction and hospitality jobs. In addition, there are plans to renovate the former Thomas Jefferson Hotel that will lead to jobs as previously mentioned.

There are plans to extend I-459 in the north and northwest section of the county. This will lead to thousands of highway construction jobs. This project is projected to last over the next 25 years. The project is estimated to cost \$5.4 billion. Consequently, there will be a significant amount of highway construction jobs available for many years to come and there will be demand to train prospective employees for this work.

In addition, the county is confidentially working with distribution, manufacturing, and information technology prospects that will further expand the local and regional economy if the projects materialize into location projects.

Local economists also predict high demand jobs to be created in the healthcare and service industry.

Services of Jefferson County Workforce Development Office

Jefferson County's Workforce Innovation and Opportunities Act or WIOA Adult and Dislocated Worker programs encourage individuals to pursue areas of interest in high demand occupations which lead to better completion results and desired employment opportunities. Participants must complete the Interest Profiler found on the Federal O*Net site. Once completed, both the participant and the Career Planner review the results and discuss various training options most suitable to the client's interests and desires as it relates to the local labor market. This ensures a stronger commitment from the participant.

The Jefferson County Workforce Development (JCWD) staff contacts local employers, chambers of commerce, and governmental agencies to identify the emerging demands and opportunities of the local, national and global economy. From the information gathered, staff provides training programs that focus on employment opportunities in those identified areas so that participants compete on a level playing field.

Staff efforts also include linking employers in high growth industries with job seekers that have participated in education and training for positions in these industries. JCWD also support and partner with other agencies, both public and private, that provide additional job readiness and job training services to citizens in the service area. These and other strategies support the leveraging of available WIOA funds in addressing these challenges.

The strategies of the JCWD staff will consist of identifying specific performance goals that focus on supporting the expansion of workforce information assets. For example, one (1) goal is to increase the number of Adult and Dislocated workers that seek training and that leads to high wage jobs.

Services to Dislocated Workers are a challenge for Jefferson County. While it is unfortunate that laid off workers are plentiful in Jefferson County, many of the workforce services available to them have not been communicated due to the lack of Jefferson County not being a co-located in the Comprehensive One Stop Career Center. Jefferson County recognizes that the best remedy for reaching out to Dislocated Workers is through co-locating in the One Stop Career Center. The Board will continue to work with the Alabama Department of Labor to identify and occupy a facility that will allow all parties to fulfill the co-location and full integration requirement of WIOA. This will further enhance employment opportunities for the citizens of Jefferson County.

Jefferson County Housing Data Analysis

According to HUD Selected Housing Characteristics from 2009-2013, there are a total of 301,587 housing units within the Jefferson County HUD Entitlement Consortium. Of this total, 259,634 or 86% are occupied and 41,953 or 14% are vacant. The housing tenure in the Jefferson County HUD Entitlement Consortium consists of 167,953 owner occupied housing units and 91,681 rental units.

Many owner occupied housing units that are in substandard condition is due to a lack of financial resources to properly maintain the homes.

Note: See Appendix D, Housing Units Census Tract Map

Disproportionate Housing Needs

Based upon the data presented in tables below, there are 359,526 people residing in Jefferson County comprising 137,646 households. According to the 2007-2011 Chase Data, of those households, 46,381 households (34%) are considered "extremely low or very low income" per HUD definitions. According to the 2007-2011 American Community Survey (ACS) 5-year Estimates, 76 percent of occupied housing units are owner-occupied and 24 percent are renter-occupied. The data also indicates approximately 14,138 renter-households and 17,379 owner-households have some type of housing problem. That is equivalent to 23 percent of the households in Jefferson County. The vast majority of Jefferson County households with a housing problem are experiencing an affordability problem.

Table III

Housing Needs Assessment Demographics

| Demographics | Base Year: 2000 | Most Recent Year: 2011 | % Change |
|---------------|-----------------|------------------------|----------|
| Population | 344,475 | 359,526 | 4% |
| Households | 134,799 | 137,646 | 2% |
| Median Income | \$36,868.00 | \$45,750.00 | 24% |

Data Source: 2000 Census (Base Year) and 2007-2011 ACS (Most Recent Year)

Disproportionately Greater Housing Problems

The 2007-2011 CHAS data, constructed from data collected by the U.S. Census Bureau for HUD, show housing problems by income and race/ethnicity. The housing problems include incomplete kitchen or plumbing facilities, cost burden greater than 30 percent, overcrowding (more than 1 person per room). The data mentioned above shows the distribution of one (1) or more problems by race/ethnicity for each of four lower income groups, 0-30 percent of the area median income (AMI), 30-50 percent of AMI, 50-80 percent of AMI, and 80-100 percent of AMI.

The data also shows the disproportionately greater need within each income group for particular racial or ethnic group.

According to HUD, disproportionate need refers to any need for a certain race/ethnicity that is more than 10 percentage points above the need demonstrated for the total households within the jurisdiction at a particular income level. The HUD 2007-2011 data indicates the share of households by race/ethnicity and income level experiencing one (1) or more of the housing problems mentioned above. To calculate disproportionate need for each race/ethnicity, Jefferson County has calculated the share of the total number of households with one (1) or more housing problems that is from a particular race/ethnicity and compared that figure to the share of all Jefferson County households at that income level that experience the problem.

Approximately 73% of Jefferson County households in the 0-30% AMI bracket experience at least one (1) housing problem. The share for each ethnicity is as follows:

White: 73%

Black/African American: 71%

Asian: 0%

American Indian, Alaska Native: 100%

• Pacific Islander: 0%

• Hispanic: 77%

Source of Data: 2007-2011 CHAS

All racial groups at 0-30% AMI experience housing problems at roughly the same rate with the exception of American Indian and Alaska Native, though this population represents only 25 households. No other race/ethnicity has a difference greater than ten percentage points and therefore does not represent a disproportionately greater need at this income for those groups.

The share of households in Jefferson County at 30-50% AMI experiencing at least one housing problem is 59%. The share for each race/ethnicity is as follows:

White: 51%

Black/African American: 78%

Asian: 44%

American Indian, Alaska Native: 100%

Pacific Islander: 100%

Hispanic: 69%

Source of Data: 2007-2011 CHAS

In the 30-50% AMI group, Black/African Americans have greater than 10 percentage points difference compared to the group as a whole and therefore have a disproportionately greater need. American

Indians, Alaska Natives and Pacific Islanders also show a disproportionately greater need but are a statistically small sample.

The share of households in Jefferson County at 50-80% AMI experiencing at least one (1) housing problem is 40%. The share for each race/ethnicity is as follows:

White: 36%

Black/African American: 55%

• Asian: 57%

American Indian, Alaska Native: 0%

Pacific Islander: 0%

Hispanic: 40%

Source of Data: 2007-2011 CHAS

Among the 50-80% AMI bracket, Black/African Americans and Asians have more than 10 percentage point's difference and show a disproportionately greater need.

The share of households in Jefferson County at 80-100% AMI experiencing at least one (1) housing problem is 26%. The share for each race/ethnicity is as follows:

White: 26%

Black/African American: 32%

Asian: 38%

American Indian, Alaska Native: 9%

Pacific Islander: 0%

Hispanic: 27%

Source of Data: 2007-2011 CHAS

All racial groups at 80-100% AMI experience housing problems at roughly the same rate with the exception of Asians though this population represents only 119 or (less than 1 percent) households out of 14,275 households in this income group. No other race/ethnicity has a difference greater than 10 percentage points and therefore does not represent a disproportionately greater need at this income level for those groups.

Disproportionately Greater Need: Severe Housing Problems

The 2007-2011 CHAS data, constructed from data collected by the U.S. Census Bureau for HUD, shows severe housing problems by income and race/ethnicity. Severe housing problems include incomplete kitchen or plumbing facilities, cost burden greater than 50 percent (share of income devoted to housing cost), and overcrowding (more than 1.5 person per room). The data shows the distribution of one (1) or

more problems by race/ethnicity for each of four (4) lower income groups, 0-30 percent of the area median income (AMI), 30-50 percent of AMI, 50-80 percent of AMI, and 80-100 percent of AMI.

According to HUD, disproportionate need refers to any need for a certain race/ethnicity that is more than ten percentage points above the need demonstrated for the total households within the jurisdiction at a particular income level. The data indicates the share of households by race/ethnicity and income level experiencing one or more of the housing problems mentioned above. To calculate disproportionate need for each race/ethnicity, Jefferson County has calculated the share of the total number of households with one (1) or more housing problems that is from a particular race/ethnicity and compared that figure to the share of all Jefferson County households at that income level that experience the problem. (Share of Race/Ethnicity = # of households for that race/ethnicity with one (1) or more housing problems / total # of households for that race/ethnicity.

Approximately 58% of Jefferson County households in the 0-30% AMI bracket experience at least one severe housing problem. The share for each ethnicity is as follows:

White: 55%

• Black/African American: 68%

Asian: 0%

American Indian, Alaska Native: 40%

Pacific Islander: 0%

• Hispanic: 64%

Source of Data: 2007-2011 CHAS

All racial groups at 0-30% AMI experience housing problems at roughly the same rate. No race/ethnicity has a difference greater than 10 percentage points and therefore does not represent a disproportionately greater need at this income level for those groups.

The share of households in Jefferson County at 30-50% AMI experiencing at least one (1) severe housing problem is 31%. The share for each race/ethnicity is as follows:

White: 26%

Black/African American: 41%

Asian: 29%

American Indian, Alaska Native: 91%

Pacific Islander: 100%

Hispanic: 22%

Source of Data: 2007-2011 CHAS

In the 30-50% AMI group, American Indians, Alaska Natives and Pacific Islanders have greater than 10 percentage points difference compared to the group as a whole and therefore have a disproportionately greater need.

The share of households in Jefferson County at 50-80% AMI experiencing at least one (1) severe housing problem is 11%. The share for each race/ethnicity is as follows:

White: 9%

Black/African American: 16%

Asian: 47%

• American Indian, Alaska Native: 0%

Pacific Islander: 0%Hispanic: 16%

Source of Data: 2007-2011 CHAS

Among the 50-80% AMI bracket, Asians have more than 10 percentage point's difference and show a disproportionately greater need.

The share of households in Jefferson County at 80-100% AMI experiencing at least one severe housing problem is 7%. The share for each race/ethnicity is as follows:

White: 7%

Black/African American: 7%

Asian: 21%

American Indian, Alaska Native: 9%

Pacific Islander: 0%Hispanic: 13%

Source of Data: 2007-2011 CHAS

All racial groups at 80-100% AMI experience housing problems at roughly the same rate with the exception of Asians though this population represents only 119 households out of 14,268 households in this income group. No other race/ethnicity has a difference greater than 10 percentage points and therefore does not represent a disproportionately greater need at this income level for those groups.

Disproportionately Greater Need: Housing Cost Burdens

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

The 2007-2011 CHAS data was used to compare housing cost burden across racial/ethnic groups. Cost burden (30 to 50% of household income going to housing expenses), extreme cost burden (more than

50% of household income going to housing expenses), and no cost burden (less than 30% of household income going to housing expenses) were compared by racial/ethnic group to the county as a whole.

The share of total households in Jefferson County that are cost burdened (30-50% income spent on housing costs) is 15%. The share of total households in Jefferson County that are severely cost burdened (more than 50%) is 11%.

The share for each race/ethnicity is as follows:

Cost Burdened (30-50%)

White: 13%

Black/African American: 21%

Asian: 9%

American Indian, Alaska Native: 13%

• Pacific Islander: 0%

• Hispanic: 20%

Source of Data: 2007-2011 CHAS

Severely Cost Burdened (>50%)

• White: 9%

Black/African American: 19%

Asian: 15%

American Indian, Alaska Native: 21%

Pacific Islander: 100%

Hispanic: 12%

Source of Data: 2007-2011 CHAS

There is only one (1) instance in the data above where the percentage of housing cost burden for a racial/ethnic group is more than 10 percent above the respective cost burden for Jefferson County as a whole. Pacific Islanders show a disproportionately greater need. All other racial/ethnic groups experience cost burden and severe cost burden at similar rates. Pacific Islanders, however, represent only 70 households out of 138,182 total households in Jefferson County.

Disproportionately Greater Need

In the above Needs Assessment, several racial and ethnic groups have disproportionately greater needs than the needs of the Jefferson County population as a whole in specific income categories.

These include:

Housing Problems

0-30% AMI

• American Indian, Alaska Native

30-50% AMI

- Black/African American
- American Indian, Alaska Native
- Pacific Islander

50-80% AMI

- Black/African American
- Asian

80-100% AMI

Asian

Severe Housing Problems

30-50% AMI

- American Indian, Alaska Native
- Pacific Islander

50-80% AMI

Asian

80-100% AMI

Asian

Cost Burden

Pacific Islander

Source of Data: 2007-2011 CHAS

Cost Burden

By far the most common housing problem in Jefferson County is cost burden. According to the HUD CHAS data, over 76 percent of households in the 0-30% AMI income category (including renters and owners) had a cost burden of over 30%, with over 64% having a cost burden of over 50%. A 30% cost burden means that a household is spending more than 30% of their gross income on housing expenses, including utilities. A 50% cost burden means that a household is spending more than 50% of their gross income on housing expenses, including utilities, and is considered a severe cost burden. Approximately 63% of households in the 30-50% AMI income category had a 30% cost burden, with 32% having a cost burden of over 50%. Approximately 44% of households in the 50-80% AMI category had a 30% cost burden, while only 12% had a cost burden of 50%.

Looking at cost burden and severe cost burden by tenure, approximately 47% of renter households and 44% of owner households earning less than 30% of the area median income (AMI) are paying more than 50% of their gross income on housing expenses. Both renter and owner households at 30-50% of AMI have a severe cost burden of approximately 34%. In the 50-80% of AMI category renters have less of an issue with severe cost burden at 14% compared to owner households at 26% experiencing this problem. Severe cost burden affects renter and owner households below 50% AMI at approximately the same rate.

Cost burden and extreme cost burden affect all household types in the lower income categories. In simple numeric terms, it would appear that "Small Related" households are most affected with severe cost burden, with approximately 44 percent of the total number of rental households affected and 38 percent of the total number of owner households affected. Small family households are the most common type of household in Jefferson County. Among renter households, those in the "Other" category make up 32 percent of households with severe cost burden followed by "Elderly" at 18 percent and "Large Related" at 6 percent. Owner households in the "Elderly" category comprise 36 percent of those experiencing severe cost burden, followed by those in the "Other" category at 21 percent and "Large Related" at 5 percent.

Cost burden and extreme cost burden are the most common housing problem across all lower income households in Jefferson County. The lower the household income, the more extreme the cost burden is for housing. Overcrowding is also a housing problem in many lower income households but to a much lesser extent.

Substandard Housing, which is defined as housing lacking complete plumbing or kitchen facilities, affects roughly as many renter and owner households as overcrowding. Lower income households experience other maintenance issues and while they may have complete plumbing and kitchen facilities, the unit may not be habitable. In many cases, lower income persons do not have the financial resources to provide the needed maintenance.

As demonstrated in the table below, 666 lacks housing units lack complete plumbing; 1,980 lack complete kitchen facilities in the unincorporated areas of the county.

Table IV

| Incorporated Area & | Lacking Complete | Lacking Complete Kitchen Facilities | |
|---------------------|---------------------|-------------------------------------|--|
| Counties | Plumbing Facilities | | |
| Jefferson County | 666 | 1,980 | |
| Adamsville | 8 | 0 | |
| Brighton | 29 | 29 | |
| Brookside | 11 | 11 | |
| Cardiff | 0 | 0 | |
| Center Point | 17 | 8 | |
| Clay | 0 | 49 | |
| Fairfield | 0 | 0 | |
| Fultondale | 0 | 0 | |
| Gardendale | 0 | 47 | |
| Graysville | 0 | 0 | |
| Homewood | 54 | 86 | |
| Hueytown | 34 | 40 | |
| Irondale | 18 | 0 | |
| Kimberly | 0 | 0 | |
| Leeds | 28 | 13 | |
| Lipscomb | 3 | 0 | |
| Maytown | 0 | 0 | |
| Midfield | 0 | 0 | |
| Morris | 3 | 3 | |
| Mountain Brook | 0 | 15 | |
| Mulga | 0 | 0 | |
| North Johns | 0 | 0 | |
| Pinson | 0 | 22 | |
| Pleasant Grove | 15 | 0 | |
| Sylvan Springs | 3 | 0 | |
| Tarrant | 0 | 0 | |
| Trafford | 0 | 0 | |
| Trussville | 19 | 13 | |
| Vestavia Hills | 12 | 229 | |
| Warrior | 0 | 0 | |
| West Jefferson | 0 | 0 | |

Many of the lower income homeowners do not have the financial resources to maintain their homes, which has led to these housing units falling into substandard condition.

According to the American Community Survey, monthly owner cost consist of include sum of payment for mortgages, deed of trust, contracts to purchase, real estate taxes; fire, hazard and flood insurance, utility bills to include electricity, gas, water and sewer. As demonstrated by the table below, lower income persons are not financially able to afford the maintenance for home ownership.

Table V

| 2009-2013 Median of Selected Monthly Owner Costs | | | | | | | |
|--|---------------|---------------------|----------------|------------------|---------------------|--|--|
| Place | With Mortgage | Without Mortgage | Place | With Mortgage | Without Mortgage | | |
| Jefferson Co | \$1,297 | \$406 | Lipscomb | \$917 | \$405 | | |
| Adamsville | \$1,114 | \$398 | Maytown | \$791 | \$299 | | |
| Brighton | \$936 | \$390 | Midfield | \$1,031 | \$449 | | |
| Brookside | \$1,048 | \$361 | Morris | \$1,352 | \$372 | | |
| Cardiff | | \$185 | Mountain Brook | \$2,761 | \$929 | | |
| Center Point | \$1,182 | \$342 | Mulga | \$872 | \$308 | | |
| Clay | \$1,384 | \$392 | North Johns | \$921 | \$325 | | |
| Fairfield | \$1,099 | \$443 | Pinson | \$1,188 | \$354 | | |
| Fultondale | \$1,177 | \$356 | Pleasant Grove | \$1,327 | \$443 | | |
| Gardendale | \$1,341 | \$352 | Sylvan Springs | \$1,126 | \$412 | | |
| Graysville | \$868 | \$355 | Tarrant | \$930 | \$334 | | |
| Homewood | \$1,719 | \$496 | Trafford | \$822 | \$242 | | |
| Hueytown | \$1,177 | \$365 | Trussville | \$1,644 | \$462 | | |
| Irondale | \$1,136 | \$382 | Vestavia Hills | \$1,981 | \$643 | | |
| Kimberly | \$1,356 | \$410 | Warrior | \$795 | \$336 | | |
| Leeds | \$1,118 | \$370 | West Jefferson | \$1,077 | \$379 | | |

Source: 2009-2013 American Community Survey 5-Year Estimates – Selected Housing Characteristics

New Residential Construction

Table six (6) below demonstrates the new housing construction within the Jefferson County HUD Entitlement Consortium. As can be seen in the data, a majority of new homes being built are in the unincorporated area of the county. Trussville, Mountain Brook, Fultondale and Gardendale showed a significant amount of new construction.

Communities where lower income persons live within the Consortium such as Center Point, Brighton, Fairfield, Midfield, Lipscomb, Graysville Brookside, and Cardiff saw no new construction in 2014.

Cost burden may contribute to this lack of new construction since lower income person do not have the financial capacity to own or maintain a new home.

Table VI

| Jefferson County, AL HUD Consortium areas | (Number of Families) | | | | Number of Units | | | Construction Costs (U.S. Dollars) | | | | |
|---|----------------------|--------|--------|---------|-----------------|--------|--------|-----------------------------------|---------------|--------|--------|-----------|
| Location | Single | Two | Three | Five or | | Two | Three | | Single Family | Two | Three | Five or |
| | Family | Family | & Four | more | Family | Family | & Four | more | | Family | & Four | more |
| Unincorporated J.C. | 229 | 0 | 0 | 0 | 229 | 0 | 0 | 0 | 47,636,574 | - | - | - |
| Adamsville | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | - | - | - | - |
| Brighton | 0 | 0 | 0 | 0 | 0 . | 0 | 0 | 0 | | | - | |
| Brookside | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | - | - | | - |
| Cardiff | 0 | 0 | 0 | - 0 | 0 | 0 | 0 | 0 | - | - | - | - |
| Center Point | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | <u>-</u> | - | - | - |
| Clay | 9 | 0 | 0 | 0 | 9 | 0 | 0 | 0 | 1,204,736 | - | - | |
| Fairfield | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | - | - | - | - |
| Fultondale | 42 | 0 | 0 | 3 | 42 | 0 | 0 | 53 | 7,081,330 | - | - | 6,747,790 |
| Gardendale | 34 | 0 | 0 | 0 | 34 | 0 | 0 | 0 | 6,112,100 | - | - | |
| Graysville | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | _ | - | - | - |
| Homewood | 19 | 0 | 0 | 0 | 19 | 0 | 0 | 0 | 7,866,882 | - | _ | - |
| Hueytown | 1 | 0 | 0 | 0 | 1 | 0 | 0 | 0 | 114,578 | - | - | - |
| Irondale | 34 | 0 | 0 | 0 | 34 | 0 | 0 | 0 | 4,531,179 | - | - | - |
| Kimberly | 31 | 0 | 0 | 0 | 31 | 0 | 0 | 0 | 4,955,840 | - | - | - |
| Leeds | 31 | 0 | 0 | 0 | 31 | 0 | 0 | 0 | 4,011,385 | - | - | - |
| Lipscomb | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | - | - | - | - |
| Maytown | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | - | - | - | - |
| Midfield | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | _ | - | - | - |
| Morris | 15 | 0 | 0 | 0 | 15 | 0 | 0 | 0 | 2,378,472 | - | - | - |
| Mountain Brook | 48 | 0 | 0 | 0 | 48 | 0 | 0 | 0 | 32,566,532 | - | - | - |
| Mulga | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | - | - | - | - |
| North Johns | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | - | - | - | - |
| Pinson | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | - | - | - | - |
| Pleasant Grove | 3 | 0 | 0 | 0 | 3 | 0 | 0 | 0 | 615,000 | - | - | - |
| Sylvan Springs | 1 | 0 | 0 | 0 | 1 | 0 | 0 | 0 | 200,000 | - | - | - |
| Tarrant | 1 | 0 | 0 | 0 | 1 | 0 | 0 | 0 | 50,000 | - | - | - |
| Trafford | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | - | - | - | - |
| Trussville | 185 | 0 | 0 | 0 | 185 | 0 | 0 | 0 | 42,053,070 | - | | - |
| Vestavia Hills | 109 | 0 | 0 | 0 | 109 | 0 | 0 | 0 | 43,841,021 | - | | - |
| Warrior | 16 | 0 | 0 | 0 | 16 | 0 | 0 | 0 | 2,197,638 | _ | - | - |
| West Jefferson | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | - | - | - |
| Totals: | 808 | 0 | 0 | 3 | 808 | 0 | 0 | 53 | 207,416,337 | - | - | 6747790 |

Source of Data: 2014 Census Bureau Building Permits, Jefferson County

Public Transportation

Birmingham Jefferson County Transit

The HUD Selected Housing Characteristics data also states that of the occupied housing units, the availability of vehicles is as follows:

No vehicles: 21,234
1 Vehicle: 92,337
2 Vehicles: 93,404
3 or more Vehicles: 52,659

Public Transportation can also have significant impact on housing choice since being able to maintain a job is contingent upon getting to work. As demonstrated above, there is a significant amount of persons who have no transportation or the transportation may not be sufficient.

The major public transportation system in Jefferson County is Birmingham Jefferson County Transit (BJCT) MAX bus system. The MAX transportation system currently serves the following communities in Jefferson County:

- 1. Birmingham
- 2. Hoover
- 3. Bessemer
- 4. Mountain Brook
- 5. Vestavia
- 6. Homewood
- 7. Tarrant
- 8. Fairfield
- 9. Midfield

The bus system begins service at 5:30 a.m. in the morning and service ends at 10:30 p.m.

Based on State legislation a city seeking services must purchase the service from BJCT.

Currently, the bus route runs every 45 minutes to an hour, which requires the passenger to be disciplined or run the risk of not getting to work on time, which could impact employment.

ClassTran

ClassTran provides public transportation to persons that are 60 years of age and older, disabled persons, and citizens who live in the rural section of the Jefferson County. The scheduled pick up time is 7:00 a.m. to 5:00 p.m.

ClassTran receives a majority of its funding from the Federal Transit Authority's (FTA) 5310 and 5311 program.

There are restrictions to this form of transportation due to ClassTran's commitment to delivering senior citizens to the nutrition centers in the morning.

These restrictions could pose a problem for persons needing a ride to work.

Home Mortgage Disclosure Act (HMDA) Data Analysis

In reviewing the 2013 HMDA data for the Birmingham-Hoover area to determine the reason for denial of FHA, FSA/RHS and VA (purchase), Conventional (purchase), Refinancing, and Home Improvement Loan applications (1- to 4-Family and Manufactured Home Dwellings), debt to income ratios and credit history appear to be the most prevalent causes across all racial groups. Specific information is presented below in table seven (7) by gender and by race for Black or African Americans, Whites, and Hispanics.

Debt to income ratios can affect any income group but would obviously have the most significant impact on lower income groups. Credit history is the most common reason for denial.

Table VII

HMDA AGGREGATE: REASONS FOR DENIAL OF APPLICATIONS FOR FHA, FSA/RHS, AND VA HOME

PURCHASE LOANS, 1-TO 4-FAMILY AND MANUFACTURED HOME DWELLINGS BY RACE OF APPLICANT,

2013

| | Black or African American | White | Hispanic | Gender M / F |
|----------------------------------|------------------------------|--------------|--------------|-----------------|
| Debt to Income | 29% | 21% | 23% | 27% / 23% |
| Ratio | | | 400/ | F0/ / 20/ |
| Employment History | 2% | 5% | 12% | 5% / 2% |
| Credit History | 33% | 32% | 16% | 30% / 33% |
| Collateral | 7% | 10% | 15% | 7% / 12% |
| Insufficient Cash | 7% | 7% | 12% | 6% / 8% |
| Unverifiable Information | 5% | 4% | 8% | 6% / 4% |
| Credit Application Incomplete | 7% | 7% | 4% | 6% / 9% |
| Mortgage Insurance Denied | Not Reported | Not Reported | Not Reported | Not Reported |
| Other | 10% | 13% | 12% | 13% / 9% |

Table VIII

HMDA AGGREGATE: REASONS FOR DENIAL OF APPLICATIONS FOR CONVENTIONAL HOME PURCHASE LOANS, 1-TO 4-FAMILY AND MANUFACTURED HOME DWELLINGS BY RACE OF APPLICANT, 2013

| | Black or African American | White | Hispanic | Gender M/F |
|----------------------------------|------------------------------|-------|----------|-------------------|
| Debt to Income Ratio | 25% | 22% | 29% | 25% / 26% |
| Employment History | 3% | 3% | 0% | 3% / 3% |
| Credit History | 43% | 36% | 45% | 36% / 38% |
| Collateral | 7% | 13% | 13% | 11% / 9% |
| Insufficient Cash | 3% | 6% | 5% | 6% / 4% |
| Unverifiable Information | 3% | 5% | 0% | 4% / 5% |
| Credit Application Incomplete | 6% | 6% | 0% | 4% / 5% |
| Mortgage Insurance Denied | 0% | 0% | 0% | 0% / Not Reported |
| Other | 10% | 10% | 8% | 12% / 9% |

Table IX

HMDA AGGREGATE TABLE: REASONS FOR DENIAL OF APPLICATIONS TO REFINANCE LOANS, 1-TO 4-FAMILY AND MANUFACTURED HOME DWELLINGS BY RACE OF APPLICANT, 2013

| | Black or African American | White | Hispanic | Gender M/F |
|----------------------------------|------------------------------|-------|--------------|---------------|
| Debt to Income Ratio | 13% | 14% | 13% | 14% / 14% |
| Employment History | 1% | 1% | Not Reported | 1% / 1% |
| Credit History | 33% | 25% | 26% | 28% / 28% |
| Collateral | 18% | 21% | 23% | 20% / 19% |
| Insufficient Cash | 6% | 4% | 3% | 3% / 5% |
| Unverifiable Information | 3% | 5% | 13% | 5% / 5% |
| Credit Application Incomplete | 10% | 16% | 12% | 13% / 14% |
| Mortgage Insurance Denied | 0% | 0% | Not Reported | 0% / 0% |
| Other | 16% | 14% | 10% | 15% / 14% |

Table X

HMDA AGGREGATE: REASONS FOR DENIAL OF APPLICATIONS FOR HOME IMPROVEMENT LOANS, 1-TO

4-FAMILY AND MANUFACTURED HOME DWELLINGS BY RACE OF APPLICANT, 2013

| | Black or African American | White | Hispanic | Gender M/F |
|----------------------------------|------------------------------|-------|--------------|-------------------|
| Debt to Income Ratio | 24% | 21% | 24% | 22% / 25% |
| Employment History | 0% | 0% | Not Reported | 0% / 0% |
| Credit History | 64% | 55% | 55% | 58% / 63% |
| Collateral | 5% | 13% | 2% | 9% / 5% |
| Insufficient Cash | 0% | 1% | Not Reported | 0% / Not Reported |
| Unverifiable Information | 0% | 1% | 2% | 1% / 0% |
| Credit Application Incomplete | 0% | 1% | 2% | 1% / 1% |
| Mortgage Insurance Denied | Not Reported | 0% | Not Reported | Not Reported |
| Other | 6% | 8% | 14% | 9% / 6% |

Note: Based on the analysis of the HMDA information, there does appear to be an impediment to fair housing as it relates to credit history and debt to income ratio.

Patterns of Occupancy in Section 8 (Public and Assisted Housing and Private Rental Housing)

The housing authorities in Jefferson County operate a total of 1,050 public housing units and administer 2,216 vouchers in their efforts to assist low-income residents of Jefferson County. The four (4) housing authorities in Jefferson County are the Jefferson County Housing Authority (JCHA), Fairfield Housing Authority, Tarrant Housing Authority, and Leeds Housing Authority. JCHA is the largest of the four public housing authorities.

| | | | | | Program Ty | /ре | | | | | |
|-------------|-------------|-------|---------|----------|------------|----------|------------------|---------------|----------|--|--|
| | Certificate | Mod- | Public | Vouchers | | | | | | | |
| | | Rehab | Housing | Total | Project - | Tenant - | Special Pu | irpose Vouche | r | | |
| | | | | | based | based | Veterans Affairs | Family | Disabled | | |
| | | | | | | | Supportive | Unification | | | |
| | | | | | , | | Housing | Program | | | |
| # of units | : | | | | | | | | | | |
| vouchers in | | | | | | D6 | e | | | | |
| se . | . 0 | 2 | 1,050 | 2,216 | 74 | 1,917 | 0 | 60 | 158 | | |

Table XI

Public Housing by Program Type

*Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Characteristics of Residents

Characteristics of Public Housing Residents by Program Type

Table XII

| | | | Pro | ogram Ty | ре | | | | | |
|---|-------------|-------|---------|---------------|-----------|----------|-------------------------------------|----------------------------------|--|--|
| | Certificate | Mod- | Public | Vouchers | | | | | | |
| | | Rehab | Housing | Housing Total | Project - | Tenant - | Special Purpose Voucher | | | |
| | | | | | based | based | Veterans Affairs Supportive Housing | Family Unification Program | | |
| # Homeless at | | | | | | | | | | |
| admission | 0 | 0 | 14 | 6 | 0 | 6 | 0 | 0 | | |
| # of Elderly Program | | | | | | | | | | |
| rticipants (>62) | 0 | О | 195 | 283 | 38 | 227 | 0 | 2 | | |
| # of Disabled Families | 0 | 0 | 307 | 668 | 32 | 480 | 0 | 13 | | |
| # of Families requesting accessibility features | | _ | | | | | | | | |
| | ** 1: 0 | 2 | 1,050 | 2,216 | 74 | 1,917 | 0 | 60 | | |
| # of HIV/AIDS | | | | | | | | | | |
| program participants | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | |
| # of DV victims | 0 | 0 | 0 | 0 | 0 | 0 | . 0 | 0 | | |

Data Source: PIC (PIH Information Center)

Table XIII

Race of Residents

Race of Public Housing Residents by Program Type

| | Program Type | | | | | | | | | | | |
|------|---------------------------------------|-------|---------|-------|---------|--------|-------------------------|--|--|--|--|--|
| Race | Race Certificate Mod- Public Vouchers | | | | | | | | | | | |
| | | Rehab | Housing | Total | Project | Tenant | Special Purpose Voucher | | | | | |

| | | | , | | -based | -based | Veterans Affairs Supportive Housing | Family Unification Program | Disabled * |
|---------------|---|---|-----|-------|--------|--------|---|----------------------------------|---------------|
| White | 0 | 0 | 287 | 314 | 38 | 244 | 0 | 6 | 26 |
| Black/African | | | | | | | | | |
| American | 0 | 2 | 762 | 1,899 | 36 | 1,670 | 0 | 54 | 132 |
| Asian | 0 | 0 | 1 | 1 | 0 | 1 | 0 | 0 | 0 |
| American | | | | | | _ | | · | |
| Indian/Alaska | | | | | | | | | |
| Native | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Pacific | | | | | | | | | |
| Islander | 0 | 0 | 0 | 2 | 0 | 2 | 0 | 0 | 0 |
| Other | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

^{*}Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-Year, and Nursing Home Transition

Data Source:

PIC (PIH Information Center)

Table XIV

Ethnicity of Public Housing Residents by Program Type

| | Program Type | | | | | | | | | | | | |
|--------------|--------------|-------|---------|--|--------|--------|--|----------------------------------|---------------|--|--|--|--|
| Ethnicity | Certificate | Mod- | Public | Vouchers | | | | | | | | | |
| | | Rehab | Housing | g Total Project Tenant Special Purpose Vou | | | | | | | | | |
| | 25 | | | | -based | -based | Veterans Affairs Supportive Housing | Family Unification Program | Disabled * | | | | |
| Hispanic | 0 | 0 | 12 | 8 | 0 | 8 | 0 | 0 | 0 | | | | |
| Not Hispanic | 0 | 2 | 1,038 | 2,208 | 74 | 1,909 | 0 | 60 | 158 | | | | |

^{*}includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

Public Housing and Housing Choice Voucher Holders

According to data provided by the public housing authorities, there are 1,490 on their public housing waiting lists. The number of elderly on the JCHA waiting list for a public housing unit is 28. The Fairfield Housing Authority reports 5 elderly on their waiting list. Families make up the largest group on the JCHA public housing waiting list with 956 and the Fairfield Housing Authority with 337.

Forty percent of the families on the JCHA public housing waiting list have requested three (3) or more bedrooms while 23 percent have a need for three (3) or more bedrooms according to data from the Fairfield Public Housing Authority. Those requesting three (3) or more bedrooms comprise 28 percent of the Tarrant Housing Authority's waiting list. Information from the Leeds Housing Authority was not available.

JCHA reports 512 on their Section 8 waiting list with 32 percent of those expressing a need for three (3) or more bedrooms.

Needs submitted to improve the living environment of low- and moderate-income families residing in public housing include security improvements, increased public transportation, training and employment opportunities, literacy classes, and additional funding for Boys and Girls Clubs programs housed on public housing properties.

Note: The lack of public housing vouchers is an impediment to fair housing.

Section 504 Needs Assessment

There are currently 307 disabled families in public housing units and 1,050 disabled families requesting accessibility features. According to data provided by the Jefferson County Housing Authority, there are 137 disabled families on their waiting list for an accessible public housing unit.

There has been a significant request from senior citizens and low income disabled persons in thee Jefferson County HUD Entitlement Consortium requesting accessibility assistance.

The Jefferson County Community and Economic Development Housing Division will continue to use its CDBG funds to provide accessibility to senior citizens and persons with disabilities.

Housing Facilities for Persons with Special Challenges

Jefferson County supports One Roof's "Discharge Coordination Policy" which includes policies, strategies, and protocols for the discharge of individuals from publicly funded institutions. Publicly funded institutions are defined as health care facilities, youth facilities, correctional facilities, mental facilities, and/or foster care. The Continuum has strategic meetings with officials from publicly funded institutions in order to be aware of anticipated discharge dates of individuals along with the actual scheduled release dates. One Roof's policy requires that housing units along with the required supportive services be readily available to individuals in need before they are discharged from publicly funded institutions.

Mentally III

Those individuals experiencing severe and persistent mental illness are often financially impoverished due to the long-term debilitating nature of the illness. The majority of these individuals receive their sole source of income from financial assistance programs – Social Security Disability Insurance or Social Security Income. The housing needs for this population are similar to low-income individuals. However, because of this limited income, these citizens need case management, support services and outpatient treatment services to monitor and treat their mental illness.

The Alabama Department of Mental Health and Mental Retardation, Division of Mental Illness, provides outpatient and residential services for adults with serious mental illness and children with severe emotional disorders. In addition to making services available to individual clients in the least restrictive environment possible, the service delivery system provides continuity of service and support for clients and their families. There are three (3) department-operated residential facilities for individuals with mental illness. Short-term, acute care and extended psychiatric care is provided by Bryce Hospital in Tuscaloosa. Two (2) facilities provide specialized services: Mary Starke Harper Center (geriatric psychiatry) and Taylor Hardin Secure Medical Facility (forensic evaluation and treatment) in Tuscaloosa. The website for the Alabama Department of Mental Health (www.mh.alabama.gov) has a Mental Illness Provider Directory that lists providers throughout the state including ten in the Jefferson County area. The listed providers offer a range of services for adult and child/adolescent patients including specialized/intensive residential treatment, intensive outpatient non-hospital and partial hospitalization programs, emergency services, rehabilitative day programs, consultation and education, indigent drug programs, forensic case management, programs for assertive community treatment and geriatric outpatient services.

The J. B. S. Mental Health Authority (Jefferson, Blount & St. Clair Counties) provides a variety of housing options for the population that it serves. The following is a summary taken from their web-site [jbsmha.com main menu - Updated 2015 (http://www.jbsmha.com/page01.html):

Independent Living

The Horizon Apartments, operated by the Authority is a 19 bed apartment complex, with a resident manager available on a 24-hour basis. The Greenwood Apartments also operated by the Authority is an 11 bed apartment complex with a resident manager available on a 24 hour basis. These complexes offer

individuals with serious mental illness an opportunity to live independently with support during emergencies. Case management support is also provided to those residents in need of these services. Referrals are received from local community agencies and the community at large.

The Authority also owns and operates four, two-bed Townhomes for independent living. Although no resident manager is located on the premises, case management services are provided to all residents. Referrals for the Townhomes are received from local community agencies and the community at large.

In addition the Authority operates 20 scattered site apartments for homeless mentally ill individuals. Case management support is provided as well as Day Treatment activities.

Residential Programs

The Authority operates a residential program for adults with mental illness, which provides treatment and housing for 90 individuals. This program is comprised of four Transitional homes, four (4) Group homes, and a Brief Intensive Treatment Home providing services to ten people each.

The residential programs are staffed and operated by the Authority. Individuals in the residential programs participate in Day Treatment activities that emphasize an educational and rehabilitative approach. As individuals leave the residential program, efforts are made to place them in supported housing arrangements, and referrals are made to local mental health centers to ensure continued support and treatment.

Developmentally Disabled

The following information was obtained from the website of the Alabama Department of Mental Health Division of Developmental Disabilities at www.mh.alabama.gov;

The Alabama Department of Mental Health Division of Intellectual Disabilities Services *ID* is now named the Division of Developmental Disabilities *DD*. Individuals with an ID and their families will continue to access services as before. Intellectual disabilities services and supports may range from information and referral, to case management or hourly services, to maximum supports that provide 24-hour care.

DD provides a comprehensive array of services and supports to individuals with intellectual disabilities and their families in the state through contractual arrangements with community agencies, five (5) regional community services offices, and three (3) comprehensive support service teams that assist with behavioral, medical, psychiatric and dental services and supports. The DD Central Office Staff provides oversight and support in planning, service coordination, service delivery, fiscal operations, contracts, eligibility, monitoring/quality enhancement of services, and the monitoring and certification of all community agencies that provide services to individuals with intellectual disabilities. A DD Coordinating Subcommittee, comprised of consumers, families, service providers and other leaders in the field, assists the division in setting and prioritizing service goals based upon needs of individuals and budgetary considerations.

Eligibility

Eligibility is determined by an assessment of the individual. The person must have an I.Q. test result of below 70; the individual must demonstrate significant or substantial functional limitations in three (3) or more of the following major life activities: self-care, receptive and expressive language development and use; learning; self-direction, mobility; and capacity for independent living, with all occurring prior to the age of 18 years. This information is determined from standardized assessments.

Residential Services

The state does not directly operate residential homes in the community. However, the ADMH contracts with community agencies to provide residential and day habilitation services or work programs for individuals who meet criteria for services. These residential arrangements and programs are located throughout Alabama. In Jefferson County, the state has contracts with the Jefferson County Intellectual and Developmental Disabilities Authority, Inc. (JCIDDA) and the Jefferson-Blount-St. Clair Mental Health Authority to provide these services through a group of provider agencies including:

- The Arc of Jefferson County
- United Cerebral Palsy of Greater Birmingham
- Glenwood, Inc.
- Volunteers of America
- Jefferson-Blount-St. Clair MH/MR Authority
- ResCare Alabama
- PHP of Alabama
- Stevens Home Health Care
- Oxford Home Health
- Comfort Keepers (Home Health)

Source: Jefferson County Intellectual and Developmental Disabilities Authority, Inc., *Two-Year Plan* 2014-2015

Population Served

According to the Jefferson County Intellectual and Developmental Disabilities Authority, Inc., *Two-Year Plan 2014-2015*, The JCIDDA serves a total of 702 (down from 745 in 2012) individuals with a primary diagnosis of and Intellectual Disability. The population served covers all ages, ethnicities and live in neighborhoods throughout Jefferson County. The level of support varies greatly from those who need very minimal support to those in need of very intense levels of support in areas such as self-care, communication, behavioral support, mobility and medical issues. The population served includes people with Intellectual Disabilities, Cerebral Palsy, Autism and Epilepsy.

Many live in supported residential settings operated by a provider agency (a total of 479, down from 496 in 2012. Some live independently or with families, while a total of 36 receive in-home Personal Care (a slight increase from 35 in 2012).

A total of 591 (down from 616 in 2012) receive day services ranging from Supported Employment, Training and Activity programs. In all, an unduplicated total of 681 people (down from 711 in 2012) receive some sort of residential, day or support service compared to over 613 (a 10.8% increase over the 2012 total of 549) on their most recent waiting list. JCIDDA expresses concern about the very clear

trend of ever-decreasing numbers of people in services alongside ever-increasing numbers of people waiting to receive services. In Jefferson County, there are many unmet needs in all areas. The 613 on the waiting list represents approximately 19% of the statewide total population total compared to the County's total share of the state's population of 13.78% (658,466/4,779,736, U.S. Census Bureau 2010). Most people are shown as needing at least two of the three (3) services available if not all three showing a significant need for services across the board.

Other unmet needs cited by consumers and providers alike include a need for transportation as well as respite and especially emergency respite care.

Alcohol and Substance Abusers

The majority of people that suffer from any form of alcohol or substance abuse maintain jobs and homes at the beginning stages of their problem. However, as the problem progresses, the ability to maintain a well-functioning lifestyle diminishes. This problem touches every income and racial group, but is found to be most prevalent among the lowest income groups. Preventive programs incorporated into housing services provided to low-income persons are necessary to address this problem.

The Alabama Department of Mental Health and Mental Retardation, Division of Substance Abuse Services has the responsibility for development, coordination and management of a comprehensive system of treatment and prevention services for alcoholism/drug addiction and abuse. This responsibility encompasses contracting for services with local providers, monitoring service contracts, evaluating and certifying service programs according to department standards for substance abuse programs, and developing models for a continuum of treatment and prevention services.

The website for the Alabama Department of Mental Health (www.mh.alabama.gov) has a link to the Substance Abuse Treatment Facility Locator at the website of the U.S. Department of Health and Human Services - Substance Abuse and Mental Health Services Administration (SAMHSA) at https://findtreatment.samhsa.gov/TreatmentLocator/faces/searchResults.jspx. Substance abuse treatment facilities in Birmingham that provide treatment and/or residential services include the following:

- Alcohol and Drug Abuse Treatment Centers
- Aletheia House
- Birmingham Healthcare
- Birmingham Metro Treatment Center
- Bradford Health Services, Birmingham Regional Office
- Department of Veterans Affairs, Medical Center
- Fellowship House

HIV/AIDS

Between 1982 and 2013, The Alabama Department of Public Health has received a total of 18,623 reported cases of HIV infections. Since 1997, the number of deaths has fluctuated around 220 per year; however, the number of persons living with HIV continues to increase. Housing is the greatest unmet need of persons living with HIV/AIDS. Research shows that 60% of all persons living with HIV/AIDS report a lifetime experience of homelessness or housing instability. Stable housing enables persons living with HIV/AIDS to obtain and adhere to life-saving medical care and treatments.

Source: State of Alabama HIV Surveillance 2013 Annual Report

• HIV/AIDS in Alabama.

As of December 31, 2013, the Alabama Department of Public Health reported that the total HIV/AIDS cases reported in Alabama totaled 14,019. Of this number, 6362 (45%) of HIV positive individuals has progressed to stage 3 (AIDS) infection.

Table XV

| | # of Persons | Percent % |
|------|--------------|-----------|
| AIDS | 6362 | 45 |
| HIV | 7657 | 55 |

HIV/AIDS in Jefferson County

Of the 14,019 cases reported in Alabama in 2013, 3,812 are estimated to be within Jefferson County. In 2013, more HIV cases were diagnosed in Jefferson County than any other county. From 2009-2013, Jefferson County has consistently reported the highest number of new cases of HIV.

Table XVI

| | 2 | 2009 | | 2010 | | 2011 | | 2012 | | 2013 | |
|------------|-----|------|-----|------|-----|------|-----|------|-----|------|--|
| County | No. | Rate | |
| Jefferson | 198 | 30.1 | 194 | 29.5 | 208 | 31.6 | 194 | 29.5 | 174 | 26.4 | |
| Madison | 39 | 11.6 | 36 | 10.7 | 46 | 13.5 | 44 | 12.8 | 40 | 11.5 | |
| Mobile | 109 | 26.4 | 91 | 22.0 | 97 | 23.5 | 88 | 21.3 | 94 | 22.7 | |
| Montgomery | 85 | 37.0 | 77 | 33.5 | 79 | 34.1 | 70 | 30.5 | 72 | 31.8 | |
| Tuscaloosa | 25 | 12.8 | 31 | 15.9 | 27 | 13.7 | 32 | 16.1 | 47 | 23.4 | |
| Statewide | 706 | 14.8 | 693 | 14.5 | 711 | 14.8 | 678 | 14.1 | 650 | 13.4 | |

Services to Local Communities and to People with HIV/AIDS

Community partners collaborate in an effort to reduce the incidence of HIV infections, to increase life expectancy for those infected, and to improve the quality of life for persons living with or affected by HIV.

BIRMINGHAM AIDS OUTREACH (BAO)

The following is a general description of some of the services that BAO offers to the clients they serve:

- Case Management-provided by BAO Social Workers to ensure that the individuals served are receiving the care they need to stay healthy and strong.
- Legal Services-They are the only AIDS Service Organization that offers free legal service for HIV positive individuals.

- Nutrition-BAO provides nutritional supplements, as well as grocery store vouchers.
- Transportation-Clients may receive assistance with gas vouchers and bus passes.
- Emotional Support-BAO offers two licensed counselors as well as support groups for women and men. Support groups meet weekly and have a catered lunch once a month.
- Prescriptions-with the help of the Ryan White CARE Act and other funding sources, BAO pays 100 %
 of all prescriptions related to HIV as well as medical items the clients may need. For the clients that
 have insurance, the Social Workers assist them with co-pay assistance programs.
- Brother to Brother-a weekly support group for HIV positive men that meets every Friday at BAO.
- Housing-BAO works closely with partner organizations such as AIDS Alabama and Aletheia House.

Aids Alabama

AIDS Alabama offers several housing programs to clients who are HIV positive:

- Transitional Housing-temporary housing and supportive services to HIV-positive persons and families who are homeless or at risk of becoming homeless.
- Permanent Housing-supportive living environment to formerly homeless persons living with HIV/AIDS who have moved out of transitional housing, but still require some support in order to maintain their stability. Although called "permanent housing" the goal of these programs is to empower residents to eventually move into unsupported housing after they have increased their income and improved their levels of independence.
- Housing Opportunities for Persons with AIDS (HOPWA)-short or long-term housing assistance to HIV-positive, low-income persons and their families.
- Shelter Plus Care (S+C)-AIDS Alabama works with the Jefferson County Housing Authority to administer Shelter Plus Care housing vouchers to eligible HIV-positive persons in the area.

AIDS Alabama supportive services include:

- Case management
- Transportation
- Utility Assistance
- Emergency financial assistance
- GED preparation/training
- Secondary HIV education
- Substance abuse treatment
- Mental health services

Sources: AIDS Alabama-2015 Website

Birmingham AIDS Outreach- 2015 Website

Correlation between HIV and Housing:

- Improved Health
 - Stable housing enables persons living with HIV/AIDS to obtain and adhere to life-saving medical care and treatments. Improving the client's housing status results in an increase in their CD4 cell counts-they experience better overall physical and mental health.
- Reduced Risk of HIV Transmission
 Improved housing status also decreases the likelihood that persons living with HIV/AIDS will participate in high risk behaviors that can lead to transmission of HIV and new HIV infections.
 Access to stable housing enables clients to adhere to their treatment and medication regimens, which lowers their HIV viral load and reduces the risk of HIV transmission.
- The stability and improved health that clients experience through housing programs reduces client's utilization of costly emergency and inpatient hospital services.
- Improving clients' housing status greatly reduces their HIV risk behaviors. In turn, each prevented HIV infection saves in discounted lifetime medical costs.

Source: AIDS Alabama-2015 Website

Supportive Housing for the Physically Handicapped

The inventory of facilities which provide supportive services for persons with physical disabilities is shown below and are frequently funded through HUD Section 811 Program.

Elderly/Frail Elderly

Programs designed to provide supportive housing for the elderly/frail are primarily funded by the Section 202 Program. Private nursing homes are considered medical facilities and are not included in this discussion. These facilities provide a wide range of supportive services. Below is a list of 202 and non 202 facilities within Jefferson County.

Table XVII

| Project Name | # of Section 8 units | Total unit |
|---------------------------|----------------------|------------|
| Princeton Towers | 146 | 146 |
| New Pilgrim Towers | 123 | 123 |
| Episcopal Place | 100 | 141 |
| W. Clyde Williams Terrace | 100 | 100 |
| Faush Metro Manor | 50 | 50 |
| Presbyterian Apartments | 60 | 60 |
| Princeton Towers II | 94 | 94 |
| East Lake Home | 66 | 66 |
| Villa Marie Manor | 64 | 64 |
| Teamster Retiree House | 30 | 30 |

| Building Trade Towers | Unknown | 243 |
|-----------------------|---------|-------|
| Spring Gardens | Unknown | 220 |
| Serene Grove | Unknown | 30 |
| Artesian Springs | Unknown | 30 |
| Rosedale Gardens | Unknown | 8 |
| Total | 833+ | 1,330 |

Federal budget cuts are having a negative impact on the number of Section 8 units which are available through local PHA's.

Another factor to consider is the potential loss of subsidized units as Section 8 agreements with HUD expire. The properties shown below indicate those that could be lost thru 2014.

Forest Hills Village Apartments 2615 Tempest Drive Birmingham, AL 35211 # of units: 152

Jefferson Avenue Apartments 2727-E Jefferson Avenue SW Birmingham, AL 35211

Valley Brook Apartments 2969-4 Gallant Drive Birmingham, AL 35215

of units: 213

Housing Stock Available to Serve Person with Disabilities

Jefferson County supports One Roof's "Discharge Coordination Policy" which includes policies, strategies, and protocols for the discharge of individuals from publicly funded institutions. Publicly funded institutions are defined as health care facilities, youth facilities, correctional facilities, mental facilities, and/or foster care. The Continuum has strategic meetings with officials from publicly funded institutions in order to be aware of anticipated discharge dates of individuals along with the actual scheduled release dates. One Roof's policy requires that housing units along with the required supportive services be readily available to individuals in need before they are discharged from publicly funded institutions.

Zoning and Land Use Policies

Jefferson County Zoning and Land Use Plan are administered by the Department of Land Planning and Development Services. According to the Fair Housing Act, a dwelling includes any building, structure, or portion thereof which is occupied as, or designed or intended for occupancy as, a residence by one or more families, and any vacant land which is offered for sale or lease for the construction or location thereon of any such building, structure, or portion thereof. Therefore, decisions related to the development or use of such land may not be based upon the race, sex, religion, national origin, color, disability, or familial status of the residents or potential residents who may live in the dwelling.

Consequently, this section of the AI analyses the county's zoning ordinance and land use plan. Bases on a review of the documents revealed the following:

- Jefferson County has an Administrative Order (AO) that requires a public hearing for all housing re-zoning cases.
- The zoning ordinance does not contain provisions that treat uses such housing or group home for people with disabilities differently from other uses nor does the ordinance have any strictly against a protected class. However, under Institutional 2, group housing is defined for assisted living, nursing homes and senior housing development, but there exist no decimation other than the fact that senior development housing is restricted to senior citizens.
- Jefferson County does not make zoning and land use decisions based on neighbors' fears that a
 dwelling may be occupied by a protected class. The only distinction in use is based on density.
- Jefferson County does not impose spacing requirements on group homes or for persons with disabilities.
- Jefferson County does not require neighborhood notification for development of affordable housing or group homes. All housing properly zoned is not subject to a public hearing.

 Jefferson County does not require additional studies or procedural steps or unnecessary delay in decision making when considering development for a protected class. The county only requires studies on the size of the development for an infrastructure analysis.

In conclusion, there appears to be no impediments to fair housing choice lined to the county's zoning and land use plan.

Tax Assessment

The Community and Economic Development staff consulted with the Jefferson County Board of Equalization to determine Ad Valorem taxes posed an impediment to fair housing choice. Based on review of the Millage Rate Chart for Jefferson County, the normal range of millage rates in Jefferson averaged between 4.1 and 7. The areas with a higher millage rates are presented below:

| 1. | Mountain Brook | 9.9 |
|----|---------------------------------|-------|
| 2. | Vestavia Hills | 9.26 |
| 3. | Vestavia Hills (Sub District 2) | 9.26 |
| 4. | Homewood | 7.5 |
| 5. | Homewood (Sub District) | 7.5 |
| 6. | Fairfield | 7.45 |
| 7. | Hoover | 7.26 |
| 8. | Vestavia Hills (Sub District 3) | 7.205 |

The millage rates for the municipalities mentioned are higher, but lined to the communities attempting to improve the education system. Citizens of all race or ethnic background are able to live in these communities.

Note: See Appendix E, Jefferson County Millage Rate Chart.

Analysis of Impediments to Fair Housing

The analysis of impediments to fair housing was examined by reviewing relevant housing data; consulting with various public organizations that have an interest in fair housing; and seeking public input during Technical Advisory Planning Meeting, which was held on July 30, 2015. The findings and conclusion of the examination of the data analyzed and meeting with public and private organizations and the general public revealed the following:

1. Cost Burden is identified as an impediment to fair housing. Lower income persons typically do not have the financial resource to maintain existing housing, which means these housing structures fall into substandard housing condition and worsen over time. Moreover, lower income person do not have the financial resources or credit to purchase and maintain a home.

The data revealed these housing problems disproportionately impact lower income Whites, American Indians, Hispanics, and African Americans.

Jefferson County will continue to uses its HUD CDBG funds to assist eligible homeowners under its Housing Rehabilitation program to repair emergency housing problems. Further, the Jefferson County Community and Economic Development housing staff will refer lower income persons to JCCEO for assistance with their weatherization housing problems. Referrals will also be made to United Way of Central Alabama for its housing program resources reserved for lower income persons.

Jefferson County will address the credit problem being experience by lower income households by funding credit counselling and credit repair as well as general homebuyer education to improve loan approval rates.

Jefferson County will invest its HOME funds in Homebuyer Assistance programs to make homeownership available to persons below 80 percent of the Area Median Household Income.

2. Citizens' lack of education concerning their rights under the Fair Housing Act.

Jefferson County will continue to place Fair Housing posters and educational materials at public events to help increase public awareness of the housing options available to lower income households and what the individual rights are under the law.

Jefferson County has and will continue to incorporate the Fair Housing logo in all of our housing promotional materials.

3. Citizens' lack of training and understanding in the mechanics, procedures and requirements of the current generation of Financial Institutions, sellers and landlords.

Note: See answer four (4).

4. Citizens' lack of knowledge in such areas as financial management and credit stability.

Jefferson County has contracted with Gateway, a non-profit and HUD Certified Housing Counseling Agency, to provide Fair Housing and Home-Ownership Counseling Services. All housing counseling services are provided at no cost to participants and may be provided through one-on-one sessions or a classroom format. Gateway Financial Freedom, a division of Gateway, was formerly known as Consumer Credit Counseling Services. The services are as follows:

- Assistance with Fair Housing complaints and those services which aid the individual or family in locating, obtaining and maintaining safe, affordable and decent housing and an independent life.
- Provide Fair Housing seminars in the workplace, churches, civic clubs and community centers, etc. The purpose of these seminars will be to stimulate a greater understanding client's rights under the Fair Housing laws.
- Housing and Financial Counseling for Eligible Residents of the Jefferson County Community Development Consortium including minorities, homeless families and families in imminent danger of becoming homeless.
- Pre-Purchase Housing Counseling to help individuals, especially first time home buyers, prepare for the process and finances of owning a home. This shall be accomplished through the creation of a detailed budget analysis and plan and through helping consumers understand the step-by-step process involved in purchasing a home.
- Foreclosure Prevention Counseling to assist homeowners or renters who have become delinquent on their mortgages or rent and are facing foreclosure or eviction. The counselor shall act as an intermediary for the Recipient to establish a plan acceptable to the lender or landlord that fits within the client's budget and brings the delinquency current over a specified period of time.
- Budget Housing Counseling to cover all aspects of the client's finances in order to formulate an effective plan.
- Credit Report Review in which the counselor will explain confidentiality as well as the contents and meaning of credit reports, access the client's credit report, cover all content areas, assist the client with concerns and explain how to make corrections.
- Provide housing counseling to potential participants in Jefferson County's Housing Programs and Initiatives. This task will be accomplished through a process of one-to-one phone conversations, and face-to-face contacts with individuals or families after a written referral is obtained from the County and/or one of its Program Partners or Participating Lenders.

5. The virtual impossibility of the private sector to provide either non-subsidized rental or ownership opportunities to those within the 80% of median income range.

Jefferson County has and will continue to use HOME funds (through the implementation of single-family and Special Needs Rental Housing for the Elderly initiatives) to increase the supply of affordable housing.

Jefferson County will seek competitive and Non-Entitlement State and Federal funding if it becomes available to supplement its housing programs.

6. Inadequate housing for the low, very low and extremely low income elderly.

Jefferson County will endeavor to work with other partners to leverage additional resource to increase the number of affordable units available to lower income homeowners and renters.

7. Lack of Section "8" Vouchers and Certificates limits the housing options available to lower income households.

Jefferson County will endeavor to structure the financing of rental developments to keep rents as low as possible. The development of rental units that require the tenant to have a Section 8 voucher in order to be able to afford the unit does not necessarily create additional units. There are a limited number of Section 8 vouchers. If those tenants and their vouchers just move from one development to the next, there is no net gain of affordable units. In addition, this process destabilizes existing rental developments and the surrounding neighborhoods by increasing their vacancy rates. Project underwriting should allow the rents to be low enough to be affordable without additional subsidies such as Section 8 vouchers which are in such short supply.

8. Lack of accessible housing, both owner and rental, for those with disabilities;

All single-family new construction shall be designed to be fully adaptable (pre-sold units shall be fully accessible as needed) and rental developments shall incorporate fully accessible and sensory impaired units.

Jefferson County will use its CDBG funds under the Emergency Housing rehabilitation program to address the accessibility needs of low income home owners.

9. Limitations of public transit transportation on routes and limited urbanized areas thus decreasing the options that transit dependent lower income households.

The BJTA and ClassTran is seeking additional funding opportunities in order to be in a position expand its service area and be able to provide more frequent pick up times.

10. Jefferson County's Workforce Development Office is not being fully integrated in the Comprehensive One Stop Career Center, which is impacts the effectiveness of Adult and Dislocated Workers to taking advantage of service to enhance employment opportunities. Not having proper

access to employment training and assistance in finding a job impacts household income and can prohibit homeownership and maintenance.

Jefferson County is in the process of working with the Alabama Department of Labor to construct a new One Stop Career Center that will be centrally located in the downtown area and close to other government agencies that service lower income persons.

The new facility will allow Jefferson County's Workforce Development Office to be more efficient in provide employment opportunities.

11. Section 504 is also identified as an impediment to fair housing. There is a significant need for accessibility in public housing and there has been in previous years a demand for accessibility in from senior citizens and low income disabled persons.

Jefferson County will support the Public Housing Authorities efforts to obtain vouchers and Section 8 certificates.

Jefferson County Community and Economic Development will continue to use it CDBG Housing Rehabilitation funds to assist lower income homeowners with accessibility.

Oversight, Monitoring and Maintenance Record

The Analysis of Impediments process has been conducted under the oversight of the Jefferson County Community and Economic Development senior management team and the Jefferson County Commission designates the Department to be responsible for ongoing oversight, self-evaluation, monitoring and maintenance of record for implementing corrective action to further enhance fair housing choice presented in the report.

The Jefferson County Community and Economic Development Department will ensure that all housing providers and sub-grantees receiving CDBG, HOME, ESG, as well as other federal funds have the following:

- 1. Affirmative Fair Housing Plan;
- 2. display Fair Housing Posters and the Fair Housing Logo; and
- 3. make available information that defines a protected class, as well as the proper procedures for filing a complaint.

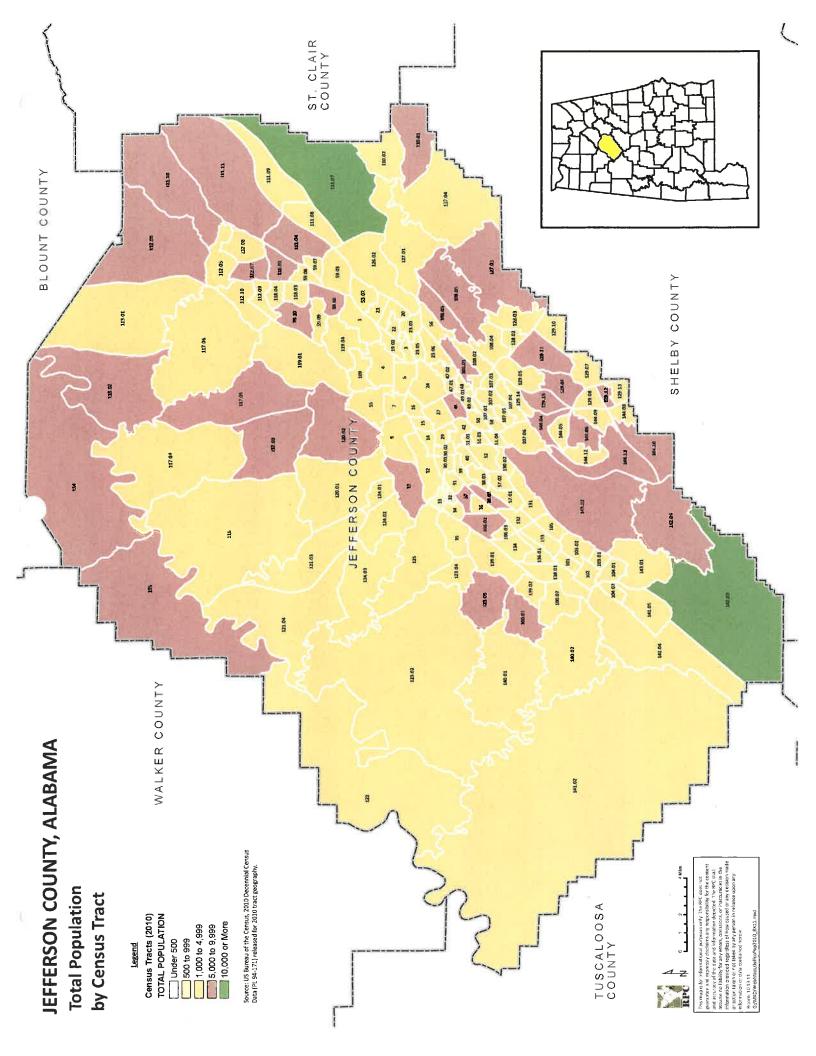
The Jefferson County Community and Economic Development will continue to support Fair Housing outreach and education activities during its Open Season process and various workshops, as well as make available fair housing information brochures to be distributed at public agencies and county facilities.

The Jefferson County Community and Economic Development Department will include Fair Housing requirements in its grant program outreach and public meetings.

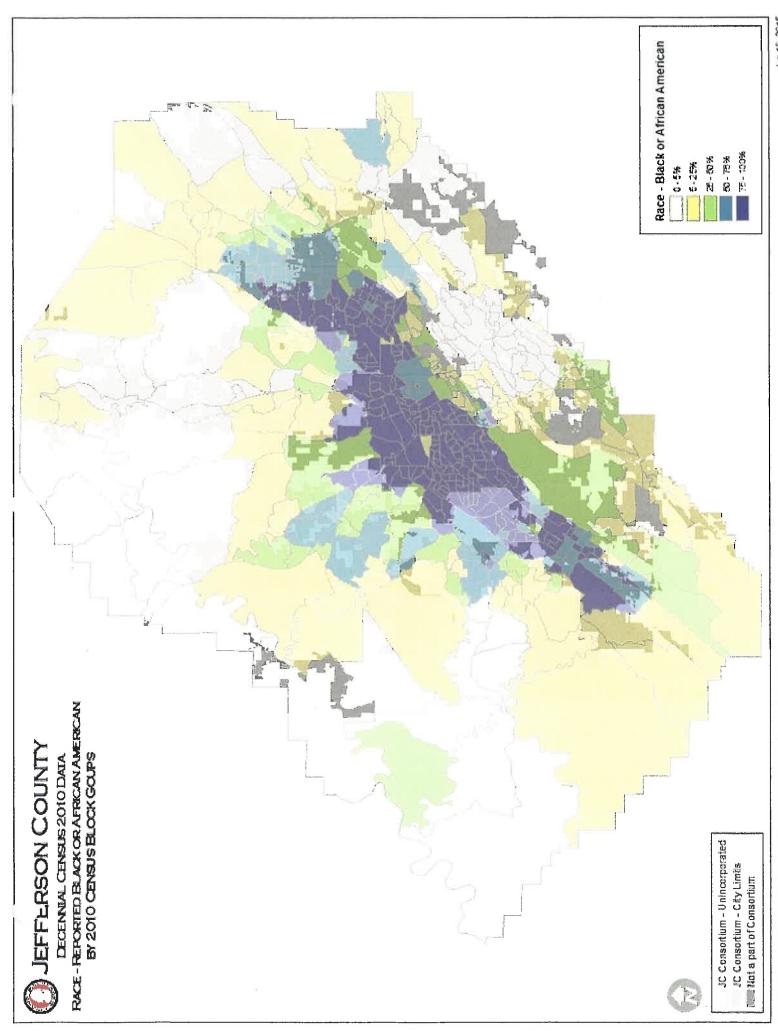
Finally, the Jefferson County Community and Economic Development staff will refer Fair Housing complaints to the HUD FHEO Regional Office in Atlanta, Georgia.

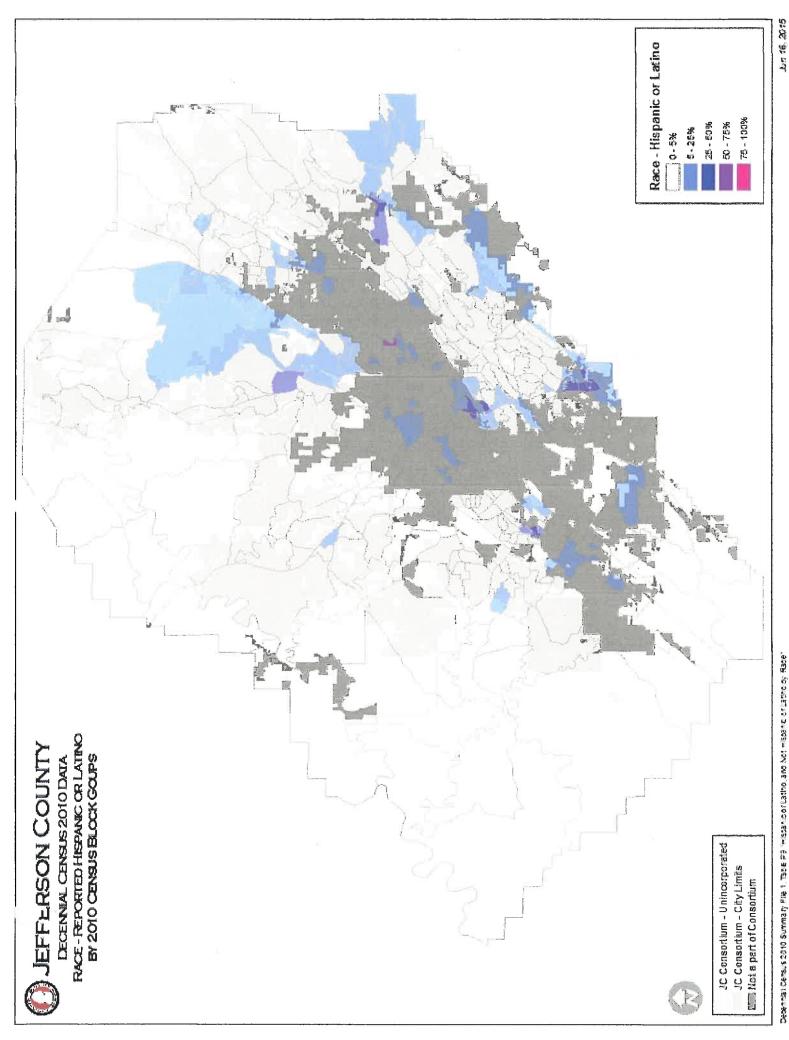
Appendix Section

Appendix A Population Census Tract Map



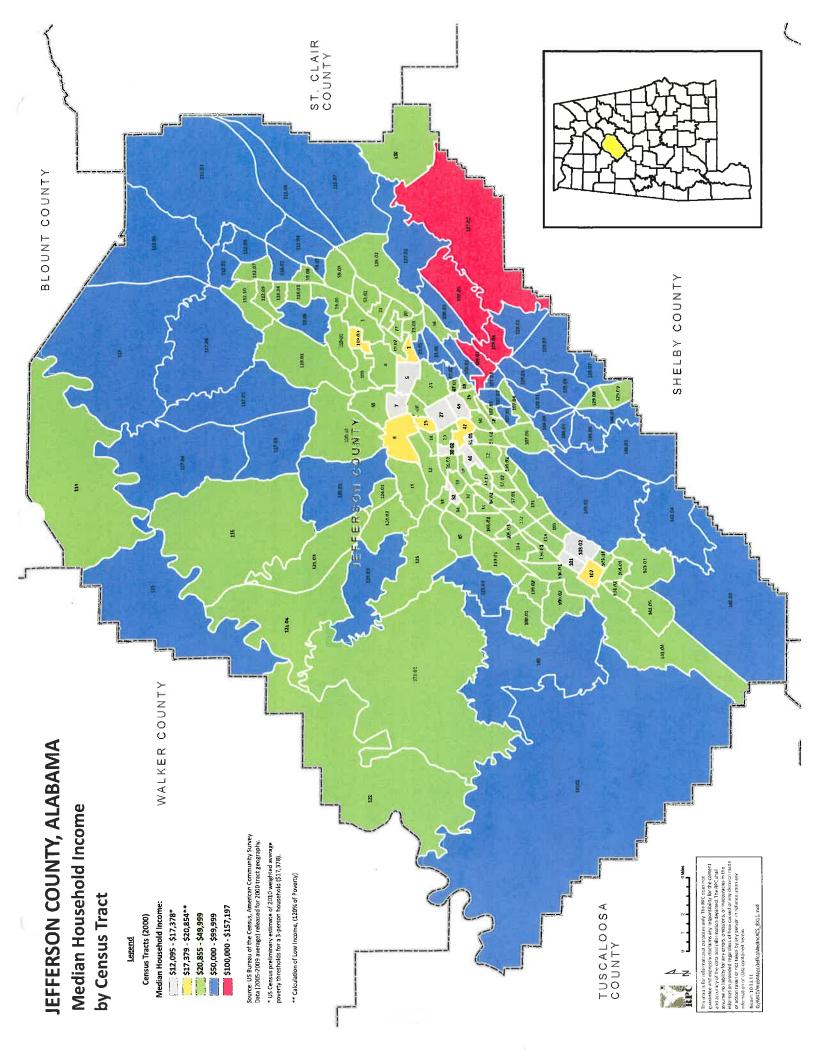
Appendix B Minority Census Tract Map



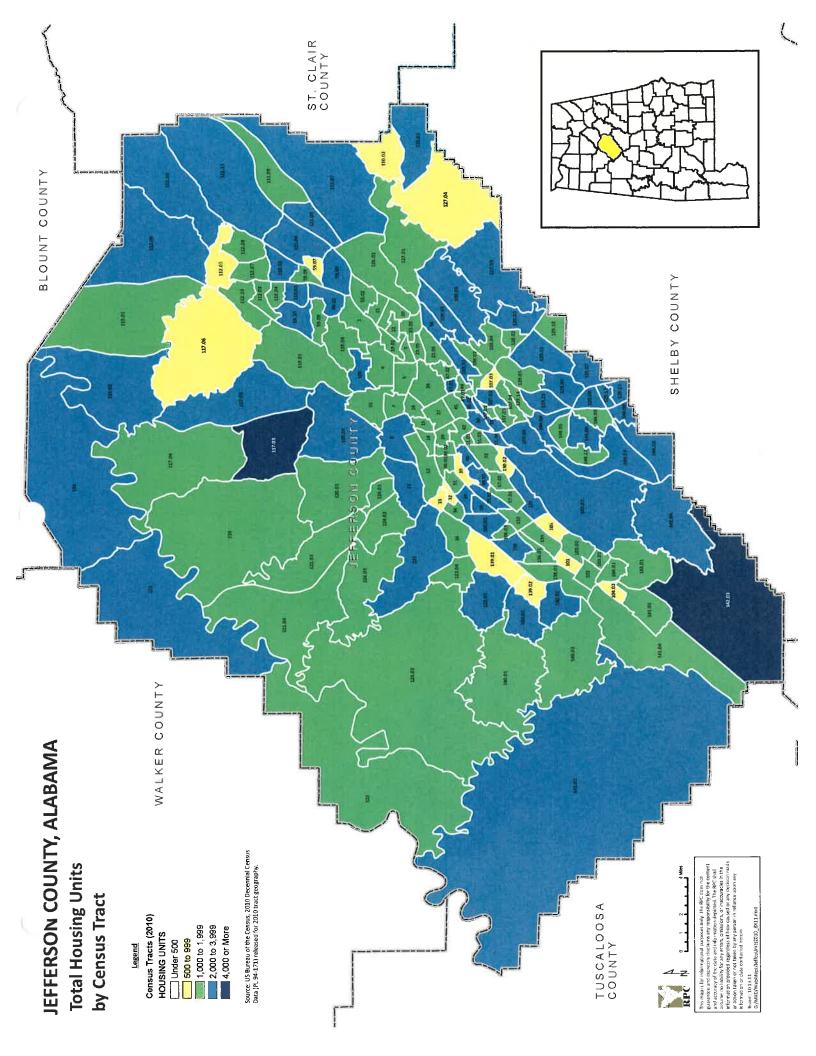


Appendix C

Median Household Census Tract Map



Appendix D Housing Unit Census Tract Map



Appendix E

Jefferson County Millage Rate Chart

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| DISTRICT NAME | DIST. STATE | COUNTY | CO.SCHOOL | SP. SCH. | SP. SCH. | SP.SCH. MT.BRK. | MUNICIP AL;FUNDS | TOTL CIP RATE / NDS \$100 | Pict | |
|--------------------------|-------------|--------|-----------|----------|----------|--------------------|---------------------|---------------------------------|---------|---|
| BIRMINGHAM DIVISION | | | | | | | . | | | μ |
| COUNTY | ਜ | 0.65 | 1.35 | 0.82 | 0.51 | 1.68 | 0 | 0 | 5.01 | |
| COUNTY (SUB DIST 10) | н | 0.3 | 1.35 | 0.82 | 0.51 | 1.68 | 0 | | 4.66 | |
| COUNTY (SUB DIST 13) | П | 0.3 | 1.35 | 0.82 | 0.51 | 1.68 | 0 | | 4.66 | |
| COUNTY-02 | 2 | 0.65 | 1.35 | 0.82 | 0.51 | 1.68 | 0 | 0 | 5.01 | |
| COUNTY-02 (SUB DIST 10.) | 7 | 0.3 | 1.35 | 0.82 | 0.51 | 1.68 | 0 | 0.4 | 4.66 | |
| UNKNOWN-3 | m | 0.3 | 1.35 | 0.82 | 0.51 | 1.68 | 0 | 0 | 4.66 | |
| ADAMSVILLE | 4 | 0.65 | 1.35 | 0.82 | 0.51 | 1.68 | 0 | 1.06 6. | 6.07 | |
| ADAMSVILLE (SUB DIST 2) | 4 | 0.65 | 1.35 | 0.82 | 0.51 | 1.68 | 0 | 1.06 6. | 6.07 | _ |
| BROOKSIDE | ī/s | 0.65 1 | 1.35 | 0.82 | 0.51 | 1.68 | 0 | 0.96 | 5.97 | |
| BROOKSIDE (SUB DIST 1) | Ľſ | 0.65 | 1.35 | 0.82 | 0.51 | 1.68 | 0 | 0.96 5. | 5.97 | |
| TRUSSVILLE | 9 | 0.65 | 1.35 | 0.82 | 0.51 | 1.68 | 0 | 1.2 6. | 6.21 6 | |
| TRUSSVILLE (SUB DIST 10) | 9 | 0.3 | 1.35 | 0.82 | 0.51 | 1.68 | 0 | 0.7 5. | 5.36 | |
| CARDIFF | 7 | 0.65 1 | 1.35 | 0.82 | 0.51 | 1.68 | 0 | 0.5 5. | 5.51 7 | |
| COUNTY LINE | <u></u> | 0.65 | 1.35 | 0.82 | 0.51 | 1.68 | 0 | 0.5 5. | 5.51 | |
| FULTONDALE | 6 | 0.65 | 1.35 | 0.82 | 0.51 | 1.68 | 0 | 0.5 5. | 5.51 | |
| FULTONDALE (SUB DIST 10) | 6 | 0.3 | 1.35 | 0.82 | 0.51 | 1.68 | 0 | 0.5 5. | 5.16 | _ |
| GARDENDALE | 10 | 0.65 | 1.35 | 0.82 | 0.51 | 1.68 | 0 | 1 6. | 6.01 10 | _ |
| GRAYSVILLE | 11 (| 0.65 1 | 1.35 | 0.82 | 0.51 | 1.68 | 0 | 0.82 5. | 5.83 | |
| GRAYSVILLE (SUB DIST 2.) | 11 | 0.65 1 | 1.35 | 0.82 | 0.51 | 1.68 | 0 | 0.82 5. | 5.83 | |
| номеwood | 12 (| 0.65 | 1.35 | 0.82 | 0.55 | 96.0 | 0 | 3.17 | 7.5 12 | |
| HOMEWOOD (SUB DIST 2.) | 12 (| 0.65 1 | 1.35 | 0.82 | 0.55 | 96.0 | 0 | 3.17 | 7.5 12 | |
| HOMEWOOD (SUB DIST 10) | 12 | 0.3 | 1.35 | 0.82 | 0.55 (| 96.0 | 0 1 | 1.87 5. | 5.85 12 | |
| IRONDALE | 13 | 0.65 1 | 1.35 | 0.82 | 0.51 | 1.68 | 0 | 0.65 5. | 5.66 13 | |
| IRONDALE (SUB DIST 10) | 13 | 0.3 1 | 1.35 | 0.82 | 0.51 | 1.68 | 0 0 | 0.65 5. | 5.31 13 | |
| KIMBERLY | 14 (| 0.65 | 1.35 | 0.82 | 0.51 | 1.68 | 0 1 | 1.25 6. | 6.26 14 | |
| KIMBERLY (SUB DIST 2.) | 14 | 0.65 1 | 1.35 | 0.82 | 0.51 | 1.68 | 0 1 | 1.25 6. | 6.26 14 | |
| LEEDS | 15 (| 0.65 1 | 1.35 | 0.82 | 0.51 | 1.68 | 0 0 | 0.92 5. | 5.93 | |
| LEEDS (SUB DIST 10) | 15 | 0.3 1 | 1.35 | 0.82 | 0.51 | 1.68 | 0 | 0.92 5. | 5.58 15 | |
| MORRIS | 16 | 0.65 1 | 1.35 | 0.82 | 0.51 | 1.68 | 0 0 | 0.65 5.1 | 5.66 16 | |
| MOUNTAIN BROOK | 17 (| 0.65 1 | 1.35 | 0.82 | 0.57 (| 0.99 1. | .85 3 | 3.67 | 9.9 | |
| TARRANT | | 0.65 1 | 1.35 | 0.82 | 1.12 | 0 | 0 | 1.7 5.64 | 18 | |
| TARRANT (SUB DIST 10) | | 0.3 1 | | 0.82 | 1.12 | 0 | 0 0 | 0.68 4.27 | 18 | |
| TRAFFORD | 19 | 0.65 1 | 1.35 | 0.82 | 0.51 1 | 1.68 | 0 | 0.5 5.51 | 11 19 | |

| Jefferson, Lounty | | | Millage nate Chart | e Chart | | | | | | |
|--------------------------------------|----|------|--------------------|---------|------|------|---|-------|-------|----|
| VESTAVIA HILLS | 20 | 0.65 | 1.35 | 0.82 | 1.51 | 0 | 0 | 4.93 | 9.26 | 50 |
| VESTAVIA HILLS (SUB DIST 2) | 20 | 0.65 | 1.35 | 0.82 | 1.51 | 0 | 0 | 4.93 | 9.26 | 20 |
| VESTAVIA HILLS (SUB DIST 3) | 20 | 9.65 | 1.35 | 0.82 | 1.51 | 0 | 0 | 2.875 | 7.205 | 50 |
| WARRIOR | 21 | 0.65 | 1.35 | 0.82 | 0.51 | 1.68 | 0 | 0.8 | 5.81 | 21 |
| WARRIOR (SUB DIST 1) | 21 | 0.65 | 1.35 | 0.82 | 0.51 | 1.68 | 0 | 0.8 | 5.81 | 21 |
| WEST JEFFERSON | 22 | 0.65 | 1.35 | 0.82 | 0.51 | 1.68 | 0 | 0 | 5.01 | 22 |
| HOOVER (BHAM DIVISION) | 23 | 0.65 | 1.35 | 0.82 | 1.39 | 0 | 0 | 3.05 | 7.26 | 23 |
| HOOVER (BHAM DIVISION) (SUB DIST 10) | 23 | 0.3 | 1.35 | 0.82 | 1.39 | 0 | 0 | 2.4 | 6.26 | 23 |
| MAYTOWN (BHAM DIVISION) | 24 | 0.65 | 1.35 | 0.82 | 0.51 | 1.68 | 0 | 0.5 | 5.51 | 24 |
| SUMITON | 25 | 0.65 | 1.35 | 0.82 | 0.51 | 1.58 | 0 | 9.0 | 5.61 | 25 |
| ARGO | 26 | 0.65 | 1.35 | 0.82 | 0.51 | 1.68 | 0 | 0.5 | 5.51 | 26 |
| BIRMINGHAM-30 | 30 | 0.65 | 1.35 | 0.82 | 0.57 | 0.71 | 0 | 2.85 | 6.95 | 30 |
| BIRMINGHAM-30 (SUB DIST 10) | 30 | 0.3 | 1.35 | 0.82 | 0.57 | 0.71 | 0 | 0.98 | 4.73 | 30 |
| BIRMINGHAM-31 | 31 | 0.65 | 1.35 | 0.82 | 0.57 | 0.71 | 0 | 2.85 | 6.95 | 31 |
| BIRMINGHAM-32 | 32 | 0.65 | 1.35 | 0.82 | 0.57 | 0.71 | 0 | 2.85 | 6.95 | 32 |
| BIRMINGHAM-33 | 33 | 0.65 | 1.35 | 0.82 | 0.57 | 0.71 | 0 | 2.85 | 6.95 | 33 |
| BIRMINGHAM-34 | 34 | 0.65 | 1.35 | 0.82 | 0.57 | 0.71 | 0 | 2.85 | 6.95 | 34 |
| BIRMINGHAM-35 | 35 | 0.65 | 1.35 | 0.82 | 0.57 | 0.71 | 0 | 2.85 | 6.95 | 35 |
| BIRMINGHAM-36 | 36 | 0.65 | 1.35 | 0.82 | 0.57 | 0.71 | 0 | 2.85 | 6.95 | 36 |
| BIRMINGHAM-37 | 37 | 0.65 | 1.35 | 0.82 | 0.57 | 0.71 | 0 | 2.85 | 6.95 | 37 |
| BIRMINGHAM-38 | 38 | 0.65 | 1.35 | 0.82 | 0.57 | 0.71 | 0 | 2.85 | 6.95 | 38 |
| BIRMINGHAM-39 | 39 | 0.65 | 1.35 | 0.82 | 0.57 | 0.71 | 0 | 2.85 | 6.95 | 39 |
| BIRMINGHAM ANNEX | 43 | 0.65 | 1.35 | 0.82 | 0.57 | 0.71 | 0 | 0 | 4.1 | 43 |
| BIRMINGHAM ANNEX (SUB DIST 10) | 43 | 0.3 | 1.35 | 0.82 | 0.57 | 0.71 | 0 | 0 | 3.75 | 43 |
| MT. OLIVE | 44 | 0.65 | 1.35 | 0.82 | 0.51 | 1.68 | 0 | ~ | 6.01 | 44 |
| MULGA | 45 | 0.65 | 1.35 | 0.82 | 0.51 | 1.68 | 0 | 0.7 | 5.71 | 45 |
| CLAY | 46 | 0.65 | 1.35 | 0.82 | 0.51 | 1.68 | 0 | 0 | 5.01 | 46 |
| CENTERPOINT | 47 | 0.65 | 1.35 | 0.82 | 0.51 | 1.68 | 0 | 0 | 5.01 | 47 |
| PINSON | 48 | 0.65 | 1.35 | 0.82 | 0.51 | 1.68 | 0 | 0 | 5.01 | 48 |

| DISTRICT NAME | DIST. S | STATE | COUNTY | со. ѕсноог | SP.SCH. | SP. SCH. | SP.SCH. MT.BRK. | ž | RATE /\$100 MUNICIPA A/V | ш 9 | Dist |
|------------------------------------|---------|-------|--------|------------|---------|----------|--------------------|---|--------------------------------|------|------|
| BESSEMER DIVISION | | | | | | | | | | | |
| COUNTY (BESS DIV)-50 | 20 | 0.65 | 1.35 | 55 | 0.82 | 0.51 | 1.68 | 0 | 0 | 5.01 | 50 |
| COUNTY (BESS DIV)-50 (SUB DIST 1) | 20 | 0.3 | 1.35 | 52 | 0.82 | 0.51 | 1.68 | 0 | 0 | 4.66 | 20 |
| COUNTY (BESS DIV)-51 | 51 | 0.65 | 1.35 | 53 | 0.82 | 0.51 | 1.68 | 0 | 0 | 5.01 | 51 |
| COUNTY (BESS DIV)-51 (SUB DIST 1) | 51 | 0.3 | 1.35 | 25 | 0.82 | 0.51 | 1.68 | 0 | 0 | 4.66 | 51 |
| BESSEMER | 52 | 0.65 | 1.35 | č | 0.82 | 0.54 | 0 | 0 | 3.51 | 6.87 | 52 |
| BESSEMER (SUB DIST 5) | 52 | 0.3 | 1.35 | ñ | 0.82 | 0.54 | 0 | 0 | 1.27 | 4.28 | 52 |
| BRIGHTON | 53 | 0.65 | 1.35 | Ŕ | 0.82 | 0.51 | 1.68 | 0 | 96.0 | 5.97 | 53 |
| BIRMINGHAM-54 | 54 | 0.65 | 1.35 | ស | 0.82 | 0.57 | 0.71 | 0 | 2.85 | 6.95 | 54 |
| FAIRFIELD | 55 | 0.65 | 1.35 | ξŭ | 0.82 | 0.58 | 0 | 0 | 4.05 | 7.45 | 55 |
| FAIRFIELD (SUB DIST 1) | 55 | 0.3 | 1.35 | δ | 0.82 | 0.58 | 0 | 0 | 2.01 | 5.06 | 55 |
| ПРSCOMВ | 99 | 0.65 | 1.35 | ĸΌ | 0.82 | 0.51 | 1.68 | 0 | 86.0 | 5.99 | 26 |
| MAYTOWN (BESS-DIV) | 57 | 0.65 | 1.35 | Ş | 0.82 | 0.51 | 1.68 | 0 | 0.5 | 5.51 | 57 |
| MIDFIELD | 825 | 0.65 | 1.35 | ıΩ | 0.82 | 9.0 | 1.05 | 0 | 3.78 | 8.25 | 58 |
| MIDFIELD (SUB DIST 1) | 28 | 0.3 | 1.35 | 5 | 0.82 | 9.0 | 1.05 | 0 | 1.4 | 4.17 | 58 |
| MULGA (BESS DIV) | 89 | 0.65 | 1.35 | S | 0.82 | 0.51 | 1.68 | 0 | 0.7 | 5.71 | 59 |
| NORTH JOHNS | 09 | 0.65 | 1.35 | 5 | 0.82 | 0.51 | 1.68 | 0 | 0.7 | 5.71 | 9 |
| PLEASANT GROVE | 61 | 0.65 | 1.35 | r2 | 0.82 | 0.51 | 1.68 | 0 | æ | 8.01 | 61 |
| SYLVAN SPRINGS | 62 | 0.65 | 1.35 | ı, | 0.82 | 0.51 | 1.68 | 0 | 0.7 | 5.71 | 62 |
| BIRMINGHAM (BESS DIV) | 63 | 0.65 | 1.35 | 2 | 0.82 | 0.57 | 0.71 | 0 | 2.85 | 6.95 | 63 |
| BIRMINGHAM (BESS DIV) (SUB DIST 1) | 63 | 0.3 | 1.35 | 2 | 0.82 | 0.57 | 0.71 | 0 | 96.0 | 4.73 | 63 |
| BIRMINGHAM (BESS DIV) (SUB DIST 2) | 63 | 0.65 | 1.35 | 2 | 0.82 | 0.57 | 0.71 | 0 | 2.85 | 6.95 | 63 |
| BIRMINGHAM (BESS DIV) (SUB DIST 4) | 63 | 0.65 | 1.35 | 2 | 0.82 | 0.57 | 0.71 | 0 | 2.85 | 6.95 | 63 |
| HUEYTOWN | 64 | 0.65 | 1.35 | 5 | 0.82 | 0.51 | 1.68 | 0 | 1 | 6.01 | 64 |
| HUEYTOWN (SUB DIST 1) | 64 | 0.3 | 1.35 | 5 | 0.82 | 0.51 | 1.68 | 0 | 1 | 99.5 | 64 |
| BIRMINGHAM-65 | 9 | 0.65 | 1.35 | 2 | 0.82 | 0.57 | 0.71 | 0 | 2.85 | 6.95 | 65 |
| HOOVER (BESS DIV) | 99 | 0.65 | 1.35 | 5 | 0.82 | 1.39 | 0 | 0 | 3.05 | 7.26 | 99 |
| HOOVER (BESS DIV) (SUB DIST 1) | 99 | 0.3 | 1.35 | 5 | 0.82 | 1.39 | 0 | 0 | 3.05 | 6.91 | 99 |
| HOOVER (BESS DIV) (SUB DIST 2) | 99 | 0.65 | 1.35 | 2 | 0.82 | 1.39 | 0 | 0 | 2.4 | 6.61 | 99 |
| HELENA | 67 | 0.65 | 1.35 | 2 | 0.82 | 0.51 | 1.68 | 0 | 0.5 | 5.51 | 29 |
| ADAMSVILLE (BESS DIV 6002) | 89 | 0.65 | 1.35 | 2 | 0.82 | 0.51 | 1.68 | 0 | 0 | 5.01 | 89 |
| UNKNOWN-69 | 69 | 0 | | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 69 |

Homesteads

STATE HOMESTEAD \$.65 PER \$100 ASSESSED VALUE ON \$4000 -- MAXIMUM - \$26.00 COUNTY HOMESTEAD \$1.35 PER \$100 ASSESSED VALUE ON \$2000 -- MAXIMUM- \$27.00 BIRMINGHAM HOMESTEAD \$1.87 PER \$100 ASSESSED VALUE ON \$1000 -- MAXIMUM - \$18.70 HOMEWOOD HOMESTEAD \$.90 PER \$100 ASSESSED VALUE ON \$2000 -- MAXIMUM - \$18.00

Tax Abatement of Non-Educational Tax

SUB-DIST. 0001 & 0005 & 0010 = TAX REFORM ACT ABATEMENT ALABAMA CODE 40-98 & 11-41-102 (10 YEAR INDUSTRIAL/MANUFACTURER ABATEMENT OF NON-EDUCATIONAL TAX)

Municipal Tax Exemption

SUB-DIST. 0002 = ACT NO. 787 OF 1977 LEGISLATURE (EXEMPT CITY TAX FOR A SET NUMBER OF YEARS)

TIF District

CAPTURES THE INCREASE TO BE HELD IN A SPECIAL FUND DESIGNATED FOR IMPROVEMENT TO THAT DISTRICT TAX DISTRIBUTION COMPARES TAX INCREASE IN ALL ENTITIES FROM BASE YEAR TO CURRENT YEAR AND BESSEMER, BIRMINGHAM, FULTONDALE, HUEYTOWN, LEEDS, & TARRANT

Capped Assessment Rates

DISTRICTS 61 (PLEASANT GROVE) & 58 (MIDFIELD) HAVE ADJUSTED ASSESSMENT RATES ON CLASS I & CLASS II DUE TO AMENDMENT #373. DISTRICTS 52 (BESSEMER) – 55 (FAIRFIELD) – 54, 63 & 65 (BIRMINGHAM) – 66 (HOOVER) HAVE ADJUSTED ASSESSMENT RATES SPECIAL TAX CALCULATION LIMITING ASSESSED VALUE ON EACH ACCOUNT IN THESE CLASSES FOR THESE DISTRICTS. ON THEIR CLASS I PROPERTY (PUBLIC UTILITY) DUE TO CONSTITUTIONAL AMENDMENT #373.

Fire Districts

SUB-DIST. 0009 & 0019 = FIRE DISTRICT DUES MCCALLA AND MCADORY = 1.0 X A/V SUB-DIST.029 = FIRE DISTRICT DUES WARRIOR RIVER MILLAGE = 1.5 X A/V SUB-DIST. 0039 DISTRICT 50, 51 = FIRE DISTRICT DUES EASTERN VALLEY SUB-DIST. 0049 DISTRICT 50, 51 = FIRE DISTRICT DUES INDIAN FORD