

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

State of Michigan
October 2016



MSHDA

MICHIGAN STATE HOUSING DEVELOPMENT AUTHORITY



Preface

This Analysis of Impediments to Fair Housing Choice was produced on behalf of the State of Michigan by TDA Consulting, under contract to the Michigan State Housing Development Authority. TDA would like to thank the leadership and staff at the Authority for their participation in this effort. Most importantly, we thank the many stakeholders, ranging from state residents to advocates to nonprofit and for-profit housing industry representatives who provided input through various focus groups, public meetings, surveys, and interviews.

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Executive Summary

The Fair Housing Act does more than simply prohibit discrimination. It requires HUD and its grantees to take “actions to affirmatively further fair housing” by, among other things, identifying and confronting structural factors leading to segregated housing outcomes.

For years, HUD has required of each jurisdiction that receive funds through the Consolidation Plan Submission – covering the Community Development Block Grant (CDBG), HOME Investments Partnership Program (HOME), Emergency Solutions Grant (ESG), Housing Opportunities for People with AIDS (HOPWA) – to certify that it “will engage in fair housing planning by:

- (1) Conducting an analysis of impediments to fair housing choice at the beginning of each five-year cycle;
- (2) Carrying out actions to overcome the effects of identified impediments;
- (3) Maintaining records and making available information and reports, including the analysis of impediments, and to document actions undertaken to eliminate identified impediments.”

As a result, each jurisdiction is required to develop an Analysis of Impediments to Fair Housing Choice (AI). Thus, the State of Michigan is required, pursuant to 24 CFR 570.847(b)(1), to “{conduct} an analysis to identify impediments to fair housing choice within the state.”

HUD defines “impediments” as: “any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status or national origin that restricts housing choices or the availability of housing choices of these protected classes.”

The term “fair housing choice” is defined by HUD as the ability of persons of similar income levels to have the same housing choices regardless of race, color, religion, sex, handicap, familial status, or national origin.¹

This report will be the final Analysis of Impediments to Fair Housing Choice prepared by the State of Michigan. In 2015, HUD issued a final rule on Affirmatively Furthering Fair Housing which, among other things, requires that all various HUD recipients, including all states, conduct an Assessment of Fair Housing (AFH) rather than an AI. Unlike the AI, the AFH will be subject to specific review and approval by HUD, and in the case of states will be truly statewide rather than focused just on non-entitled portions of the state.

Broadly speaking, the AFH process replaces and supersedes the AI process. HUD expects the AFH will further standardize the approach to a jurisdiction’s understanding of fair housing issues and lead to more substantive actions in an effort to affirmatively further fair housing. In particular, while certain details of the AFH process are still subject to change as HUD considers and responds to public comment on the AFH tool, a key feature of the AFH is an increased focus on systemic barriers to fair housing choice, particularly among “non-housing” elements of State and local policy. In many respects land use/zoning, school, and

¹ Note that Michigan state law also provides protections for marital status.

transportation policies are larger drivers of segregated housing patterns than decisions about where to invest very limited housing and community development funding from HUD.

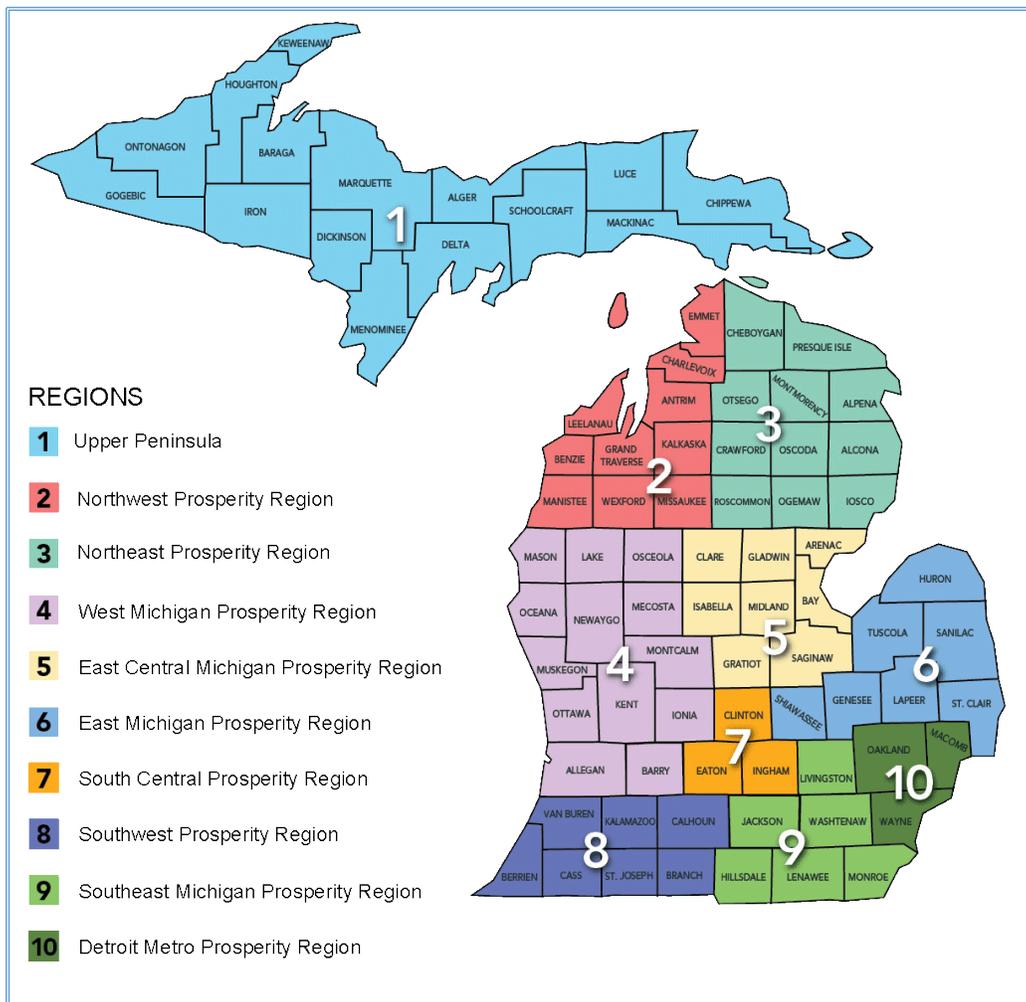
At the same time, affirmatively furthering fair housing will continue to include efforts by HUD recipients to ensure that consumers, local officials, housing providers, and affiliated professionals are aware of nondiscrimination requirements.

The information in this report is organized to provide context at the state level as well as regional analyses of key factors throughout the report. Larger cities and urban counties that receive their own direct allocations of CDBG funds from HUD are referred to as “entitlement communities.” Similarly, cities and counties that receive HOME Investment Partnerships Program (HOME) funds from HUD are “participating jurisdictions” or PJs.² Entitlement communities and participating jurisdictions must undertake their own Analyses of Impediments to Fair Housing. As a result, this Analysis of Impediments to Fair Housing primarily focuses on “non-entitlement communities,” or those jurisdictions that are State of Michigan grantees and receive CDBG or HOME funds through the State rather than directly from HUD, including through the Michigan State Housing Development Authority (MSHDA) and the Michigan Economic Development Corporation (MEDC). Michigan jurisdictions excluded from this report’s analysis because they are entitlement communities include those listed below.

EXCLUDED COUNTIES	EXCLUDED MUNICIPALITIES (COUNTY STILL INCLUDED):	
Genesee	Battle Creek	Muskegon
Kent	Bay City	Muskegon Heights
Macomb	East Lansing	Norton Shores
Oakland	Kalamazoo	Portage
Washtenaw	Lansing	Saginaw
Wayne	Midland	

The non-entitlement communities that will be the focus of this report may be referred to as “Balance of State” communities. These communities will be analyzed by regions that correspond to Michigan’s Prosperity Regions. The map below depicts the division of counties across the Prosperity Regions. Entitlement communities are excluded from the analysis as described above. Additionally, Appendix A provides a list of all counties by region and indicates those areas that have been excluded from the various regional analyses. Note that Region 10 is excluded in its entirety because all counties within Region 10 are entitlement communities.

² Each program has different qualifying thresholds, but with few exceptions nationally and none in Michigan HOME participating jurisdictions are also CDBG entitlement communities. However, not every CDBG entitlement also receives HOME. States receive both. State CDBG funding may only be invested in communities that are not CDBG entitlement communities, while a state may invest its HOME funds anywhere in the state, including in communities that are HOME participating jurisdictions.



Based on current HUD guidance, the State of Michigan anticipates preparing an AFH ahead of its 2020-2024 Consolidated Planning cycle. So while it has been prepared in accordance with existing HUD requirements, in many respects this Analysis of Impediments is intended to help the State bridge the transition from the AI to the AFH process.

As outlined in greater detail in the Findings and Recommendations section of this report, the primary impediments to fair housing identified in the non-entitled portions of the State include:

- Inadequate public awareness of fair housing and nondiscrimination requirements among both consumers and different sectors of the real estate industry, particularly small landlords.
- A narrow understanding of the need to address structural barriers to fair housing at both the state and local government level, which tends to silo this issue to “housing” agencies and/or staff rather than creating linkages between housing outcomes and “non-housing” governmental functions.
- Increased rates of poverty which disproportionately affect protected classes such as African-Americans, exacerbating limits on mobility and housing choice for such households and creating potentially debilitating generational cycles of disadvantage.

- Decreasing housing affordability, particularly for renter households, which likewise affect protected classes at disproportionate rates and contribute to segregated housing patterns.
- Increasing disconnects, particularly in rural regions, between an aging population experiencing higher rates of disability and the availability of accessible housing stock that can allow elderly and disabled households to age in place with appropriate community supports.

To address these impediments, this Analysis of Impediments makes a variety of recommendations to be considered over the next two years which are centered on two major areas – reinvigorating public education efforts around fair housing rights and concerns and building a broader institutional awareness around state government’s responsibility for affirmatively furthering fair housing, particularly by identifying and addressing structural barriers to fair housing choice. The goal, in addition to meeting current and ongoing obligations to affirmatively further fair housing, is to create the institutional infrastructure that will prepare the State to fully comply with the more robust requirements of the AFH process, including broader participation by departments and agencies beyond simply MSHDA and MEDC as the primary administrators of HUD funding.

These recommendations are further supplemented by an Action Plan outlining specific steps the State can begin take over the next two to three years. Key features include the development of educational materials, including web-based formats, targeted to specific groups such as consumers, small landlords, and local government officials as well as expanding on current intra-departmental efforts to break down silos between housing, community economic development, transportation, human services, among others to integrate consideration of fair housing outcomes in broader coordination and planning efforts.

I. Update On Previous Impediments

In 2008, MSHDA published a state-wide Analysis of Impediments to Fair Housing.³ The 2008 Analysis of Impediments was prepared by the Fair Housing Centers of Michigan. A summary of the recommendations from and actions reported by the state follows:

Table: Recommendations from 2008 Michigan Analysis of Impediments to Fair Housing Choice
<p>Issue/Impediment/Finding: Embed Fair Housing into the Legal Instruments, Policies and Practices of all Sub-State Jurisdictions.</p>
<p>Recommendation: Make firm commitments (with measureable outcomes for tracking progress) to strengthening the local, county, and regional infrastructure that can embed Fair Housing policies and practices at every level, in every jurisdiction. (page 223) (Chapter 2)</p>
<p>Actions Noted: In 2008, MSHDA’s Community Development Division (CCD) (many functions of which have now been transferred to the MEDC) promulgated a Policy Bulletin on Fair Housing applicable to all grantees. This policy, which has been periodically updated, most recently in September 2015, requires all CDD grantees, including non-entitled local units of government, to adopt a local Fair Housing Resolution or Ordinance as a condition of receiving MSHDA funding (including HOME, CDBG, etc.). Among other requirements, CDD grantees must appoint a local Fair Housing Contact, establish a complaint referral system, keep a log of fair housing outreach efforts, training, and complaints received, and include fair housing concerns in local citizen participation processes surrounding the use of HUD funds.</p>
<p>Issue/Impediment/Finding: “Public Benefits” must start with the most vulnerable populations.</p>
<p>Recommendation: We recommend that: if a planned housing decision, by a unit of government or a housing provider, does not increase the possibility that protected group persons will be able to secure housing in the community on an equal basis as other persons, then the decision makers should carefully weigh the possible fair housing consequences of the planned decision. (page 223) (Chapter 2)</p>
<p>Actions Noted: In addition to efforts noted above to elevate awareness of fair housing concerns among local governments seeking MSHDA funding, both MSHDA and the Michigan Department of Health and Human Services (DHHS) have required the use of the Service Prioritization Decision Assistance Tool (SPDAT) within homeless programs. The SPDAT has been identified as a national best practice housing prioritization tool that takes subjectivity out of who is referred to housing. People living in homelessness and or poverty are scored and referred on a priority basis to housing and services that best meet their needs. Through use of the SPDAT, people with high needs are referred long-term rental</p>

³ [State of Michigan Analysis of Impediments to Fair Housing Choice in Non-Entitled Areas of the State, 2008.](#)

assistance programs, whereas others may be given just enough assistance to allow them to stabilize and regain self-sufficiency.

Issue/Impediment/Finding:

American Indians in Michigan

Recommendation:

MSHDA, in collaboration with tribal leaders and service providers, strengthen its current efforts to address the Fair Housing needs of American Indians residing on non-tribal land. (page 223) (Chapter 2)

Actions Noted:

MSHDA has included a scoring preference in its Qualified Allocation Plan (QAP) for Low Income Housing Tax Credits sponsored by federally recognized tribes, including project undertaken on non-tribal land. While no such projects have been funded at this point, the scoring preference remains available.

Issue/Impediment/Finding:

Growth, Community Marketing and Fair Housing

Recommendation:

MSHDA should insure (through collaboration with other Michigan departments and local/regional units of government) that Economic Development Plans include an explicit commitment to Fair Housing – such as Fair Marketing Plans and materials that provides information about State and Federal Fair Housing Laws and the services provided to help enforce those laws. (page 223) (Chapter 2)

Actions Noted:

In addition to the requirement that grantees seeking federal funding adopt local fair housing policies or ordinances, the MSHDA-sponsored Building Michigan Communities Conference (formerly the Michigan Affordable Housing Conference) has included various sessions promoting the development of inclusive and diverse neighborhoods and reducing barriers to the development of affordable housing. While not intended to be an exhaustive list,

- 2008 sessions included Economic Integration in Urban Neighborhoods; Breaking Down Barriers to Affordable Housing in Rural Areas; Homeownership for People with Disabilities; Adaptable, Accessible and Affordable: What this Means to Tenants, Home Owners, Builders, Realtors, and Developers;
- 2009 sessions included Tenant Selection and Fair Housing in Supportive Housing; Introduction to Fair Housing and Predatory Lending;
- 2010 sessions included Fair Lending and Predatory Lending: Understanding Discrimination in Lending; Fair Housing Act;
- 2012 sessions included Fair Housing, Marketing and 504 Requirements;
- 2013 sessions included Understanding Fair Housing for Housing Providers and Fair Housing, Marketing and 504 Requirements;
- 2014 sessions included Understanding Fair Housing for Housing Providers;
- 2015 sessions included Disability Rights & Fair Housing; and
- 2016 sessions included Fair Housing in the Homeownership Process.

<p>Issue/Impediment/Finding: Adherence to Fairness in Building Codes</p>
<p>Recommendation: Collaboration with other Michigan Departments and private sector groups to assure that housing providers in Michigan are aware of and adhere to the provisions in State and Federal Fair Housing Laws that prohibit discrimination against persons with disabilities. (page 224) (Chapter 2)</p>
<p>Actions Noted: In addition to prior actions noted herein, MSHDA has provided additional training to developers and property managers of MSHDA-financed multifamily projects on Fair Housing requirements, including those related to disability, at its annual Asset Management Conference. Additionally, All MSHDA bond-financed properties are required to develop and implement MSHDA-approved Affirmative Fair Housing Marketing Plans.</p>
<p>Issue/Impediment/Finding: Review of the Michigan Construction Standards</p>
<p>Recommendation: Work with the Michigan Department of Labor to insure that the Michigan Construction Standards not only meet Federal accessibility requirements for persons with disability, but that they also work to make Fair Building Codes (such as Universal Design Standards) a reality in All Michigan communities. (page 224) (Chapter 2)</p>
<p>Actions Noted: MSHDA applies the Uniform Federal Accessibility Standards (UFAS) to projects involving federal financing, including HOME and project based vouchers, and applies such standards when applicable to projects funded via grantees receiving MSHDA funding. MSHDA’s Community Development Division has also adopted “visitability standards” applicable to newly constructed single-family homes. These standards exceed building code requirements and are intended to ensure that new units supported by MSHDA funding are more accessible and more easily adaptable in the future than homes built only to existing building code standards.</p>
<p>Issue/Impediment/Finding: Further public awareness necessary</p>
<p>Recommendation: Provide technical assistance to local units of government and housing providers to help assure compliance with the less well known or understood provisions of State and Federal Fair Housing Laws: age, disability status, marital status and familial status. (page 224) (Chapter 2)</p>
<p>Actions Noted: See prior actions pertaining to the requirement for local fair housing policies and training opportunities supported by MSHDA.</p>
<p>Issue/Impediment/Finding: The current Planning & Zoning revolution in Michigan</p>
<p>Recommendation: Take an active role in encouraging local units of government to incorporate fair housing assurances and issues in their Master Plans and Zoning Ordinances. (page 224) (Chapter 3)</p>

<p>Actions Noted: In 2011, Michigan began planning a threshold model for both prioritizing its investments in local communities and advancing the state of local planning and regulation in the State. This model uses a development “readiness” basis and is named the Redevelopment Ready Communities (RRC) program.</p> <p>The RRC Program establishes best practices across six major parts of the local community policy, planning, and regulatory system, and presents a mechanism for locals to enter, prepare, be evaluated, and be certified in meeting the best practice “thresholds”. Local units of government progressing to, becoming, or maintaining certification are given priority for State technical and financial assistance tools and programs. Over time more programs across State agencies and departments are (and will continue to be) incrementally added.</p> <p>The best practices are designed to improve as research, knowledge, and policy advancements are made. This provides an opportunity to introduce and standardize fair housing perspectives and the promotion of integrated and mixed-income housing into the RRC program.</p>
<p>Issue/Impediment/Finding: Housing Stock Inventories</p>
<p>Recommendation: Encourage and assist more communities to make inventories of their housing stock, with particular attention to the adequacy of housing (for sale or rental) for protected populations under the Fair Housing laws. (page 224) (Chapter 3)</p>
<p>Actions Noted: MSHDA sponsors two different housing directories, including the Affordable Rental Housing Directory (http://housing.state.mi.us) which identifies state- and federally-assisted rental housing projects and the Michigan Housing Locator (http://www.michiganhousinglocator.com/) which not only includes the affordable inventory but can be used by any property owner to list the current availability of rental housing units.</p>
<p>Issue/Impediment/Finding: Legal Definitions of “Family”</p>
<p>Recommendation: Alert local units of government of the potential legal liabilities they face with a definition of family based on “bloodline” or “marriage.” (page 224) (Chapter 3)</p>
<p>Actions Noted: Upon the advice of counsel, MSHDA has not pursued this item. It is beyond the scope of MSHDA’s authority to provide legal advice to local units of government.</p>
<p>Issue/Impediment/Finding: Embed Fair Housing compliance & support in Michigan’s “way of doing local government”</p>
<p>Recommendation: We recommend that MSHDA work through the networks and associations of county, city and township officials and with the professional planning groups that advise local units of government to take steps to more effectively embed compliance and support for Fair Housing laws, principles models into the structures of local government in Michigan. (page 224) (Chapter 3)</p>

<p>Actions Noted: MSHDA maintains strong working relationships with the Michigan Municipal League, Community Economic Development Association of Michigan, Michigan Housing Council, Michigan Community Developers Association, and the Michigan Association of Planning. Several of these organizations have been involved in the development and promotion of the Redevelopment Ready Communities program and approach. Though these types of efforts, MSHDA is able to promote topics such as fair housing both informally and in more formal presentations at various meetings and conferences.</p>
<p>Issue/Impediment/Finding: Fair Housing TESTING</p>
<p>Recommendation: Renew steps to conduct fair housing testing of MSHDA-assisted housing providers. (page 225) (Chapter 4)</p>
<p>Actions Noted: Since MSHDA-assisted projects and programs are subject to testing by independent regional fair housing centers who receive HUD and other sources of funding, MSHDA has elected not to specifically contract for targeted testing.</p>
<p>Issue/Impediment/Finding: Fair Housing ENFORCEMENT</p>
<p>Recommendation: Require that governmental recipients of CDBG or HOME funds through MSHDA establish a fixed percentage of those funds to support fair housing enforcement activities. (page 225) (Chapter 4)</p>
<p>Actions Noted: MSHDA has determined that such a requirement exceeds its authority under the federal regulations for HOME and CDBG. Local government grantees may use administrative funds for this purpose or for other activities to affirmatively further fair housing, but are not required per se to use a fixed amount of limited administrative funding for enforcement.</p>
<p>Issue/Impediment/Finding: Need an expanded Michigan capacity to track Fair Lending compliance</p>
<p>Recommendation: The lack of data collection and accountability on discriminatory mortgage practices within the state is an impediment to fair housing in and of itself. (page 225) (Chapter 5)</p>
<p>Actions Noted: MSHDA's Homeownership Division participates in Fair Lending Compliance by following Mortgage Industry guidelines; CFPB regulations, QM guidelines and the ability to pay guidance. All files submitted are vetted through a MSHDA Underwriter to review for compliance. Files are then issued a commitment letter, guiding the lender to proceed to closing. The files are then closed in the Lenders name and assigned to MSHDA upon closing. We then pull a 10% random sample for Quality Control testing. This testing is completed by a third party organization (Stewart Lending Services). All audit observations are reviewed and adjustments are made to our operating manual.</p>

<p>Issue/Impediment/Finding: Support the Michigan Community Reinvestment Coalition, sponsored by CEDAM</p>
<p>Recommendation: Assist in the fair lending practices in the non-entitlement communities by providing funding for the Michigan Community Reinvestment Coalition and/or other similar citizen based groups for both research and organizational purposes. (page 225) (Chapter 5)</p>
<p>Actions Noted: The Michigan Community Reinvestment Coalition is no longer in existence. As noted above, MSHDA maintains relationships with various industry associations representing non-entitled communities and nonprofit partners across the state and promotes fair housing among other issues through both formal and informal channels.</p>
<p>Issue/Impediment/Finding: Improve public awareness by buyers & renters</p>
<p>Recommendation: Provide educational workshops to prospective homebuyers and renters about their rights under fair housing legislation and how complaints are filed. (page 225) (Chapter 6)</p>
<p>Actions Noted: See above responses related to various conference trainings and expectations that local grantees provide fair housing materials to local consumers as part of each MSHDA-funded community's fair housing policy.</p>
<p>Issue/Impediment/Finding: Enforcement of accessibility standards for persons with disabilities</p>
<p>Recommendation: There is a need for better enforcement of accessibility requirements for persons with disabilities. (page 225) (Chapter 6)</p>
<p>Actions Noted: See prior responses about MSHDA's use of UFAS standards and promotion of visitability.</p>
<p>Issue/Impediment/Finding: Need a PHONE HOTLINE (1-200) for Fair Housing concerns</p>
<p>Recommendation: MSHDA to secure funding for and housing discrimination phone hot-line and Internet connection that will allow persons with complaints of unlawful housing discrimination. (page 225) (Chapter 6)</p>
<p>Actions Noted: MSHDA maintains a tenant call center phone number to allow tenants to report complaints regarding properties funded by MSHDA. This would include complaints related to unlawful housing discrimination.</p>

II. Methodology

In order to gain pertinent information on fair housing needs and activities in the State of Michigan, MSHDA conducted and analyzed Fair Housing Surveys completed by community residents, jurisdictions, and stakeholder organizations across the state; conducted state-wide focus groups; interviewed key stakeholders including advocacy organizations and government officials; collected and analyzed demographic and housing data; and conducted a literature review.

- **Fair Housing Surveys** - Three written surveys were developed to collect perspectives of residents, jurisdictions, and stakeholder groups. The resident survey was also made available in Spanish. The purpose for conducting the survey was to obtain information and insights about fair housing choice in Michigan. The surveys were posted to MSHDA's website and promoted through MSHDA's list serv. Advocacy groups and community-based organizations were asked to share the survey links as well. A total of 225 residents, 76 jurisdiction representatives, and 177 stakeholder organization representatives completed the surveys.
- **Statewide Focus Groups and Stakeholder Meeting** – MSHDA held three statewide focus groups in Jackson, Grand Rapids, and Lansing.⁴ MSHDA also facilitated a fair housing discussion among grantees at its regional housing meeting in Shepherd (which included remote satellite connections from other locations, including in the Upper Peninsula) and at public meetings in Gaylord and in Marquette.
- **Analysis of Impediments** - The U.S. Department of Housing and Urban Development requires its CDBG entitlement communities to conduct a Fair Housing Analysis. In the analysis, each entitlement community is required to identify fair housing problems and impediments, courses of action intended to address the impediments, and a schedule to resolve those problems identified. In order to gain relevant data on both statewide and regional housing impediments, a scan of the reports was completed to determine the most prevalent housing impediments, and the courses of action most commonly used by communities to combat housing problems.
- **Housing Data** - This report uses American Community Survey data, Census data, and the Home Mortgage Disclosure Act Reporting (HMDA) data to review and analyze state demographics, housing needs, and housing/lending activity.
- **Literature Review** - In order to gain pertinent information on fair housing and related issues, a thorough literature review of relevant publications and periodicals was conducted. Information gained from the literature review was incorporated in the findings section and was used to support recommendations offered in this report.

⁴ Due to inclement weather the Jackson focus group was held via teleconference.

III. Michigan Community Profile

The goal of the community profile is to paint a picture of the current demographic, economic, and housing context of the State of Michigan in order to aid decision makers in affirmatively furthering fair housing. The community profile is broken into two key sections: (1) the Demographic and Economic Profile; and (2) the Housing Profile. The Demographic and Economic profile looks at the state from the perspective of its people, examining variables such as race and ethnicity, age, disability status, income, employment, and poverty. The Housing Profile examines the state's housing stock by analyzing data on home values, rents, housing cost burden, vacancy, and substandard housing to provide a snapshot of the physical environment in which Michigan's people live. Together these pieces provide a data-driven view of the State that can empirically ground fair housing planning efforts.

The primary geographic focus for the Community Profile is statewide analysis, with highlights of Michigan's non-entitlement counties peppered throughout for the purpose of comparison. Data highlights for all non-entitlement counties follow in the Regional Overviews section.



Demographic and Economic Overview

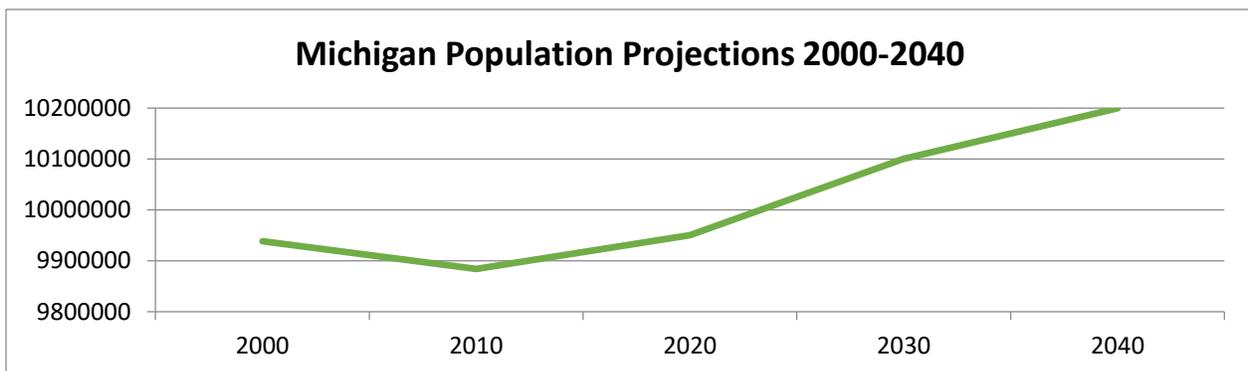
Population

The current population of the State of Michigan is 9,889,024, according to 2010-2014 American Community Survey 5-Year Estimates. This represents a decrease of 0.5 percent growth since 2000. By contrast, the national growth rate for the same period was 11.6 percent. There was a period of growth between 2000 and 2009 (1%), but by 2014 the population had fallen 1.5 percent.

	2000	2009	2014	% Change 2000-2014
Michigan	9,938,444	10,039,208	9,889,024	-0.5%
United States	281,421,906	301,461,533	314,107,084	11.6%

Source: 2000 Census, 2005-2009 ACS 5-Yr Estimates, 2010-2014 ACS 5-Yr Estimates (DP05)

According to the 2012 report *The Economic and Demographic Outlook for Michigan through 2040*, prepared by the University of Michigan’s Institute for Research on Labor, Employment and the Economy, the population for the state is forecast to reverse its decline of the past decade to grow between 2010 and 2020, though growth is predicted to increase slowly, increasing less than 1/10 of a percent a year. Michigan should return to 2000 population levels by 2020 and the population growth for the state is expected to increase again from 2020 to 2040 but remain modest, averaging just over 1/10 of a percent per year.⁵

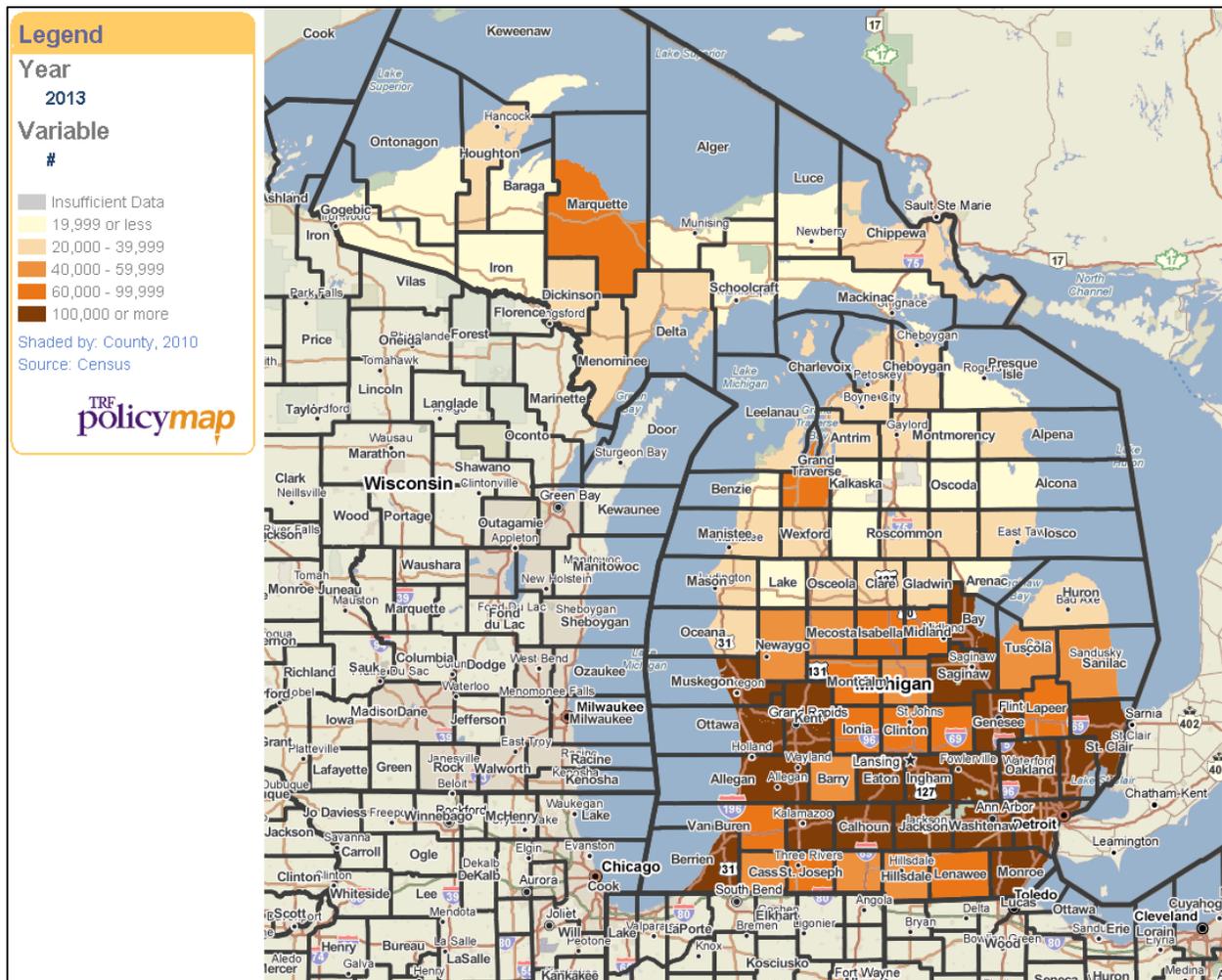


Source: 2000, 2010 Census, 2020-2040 Institute for Research on Labor, Employment and the Economy, U of M

⁵ University of Michigan, Institute for Research on Labor, Employment and the Economy, *The Economic and Demographic Outlook for Michigan through 2040*, 2012

The following map geographically displays the distribution of the population throughout the state. The lighter shaded areas have a lower of population and darker shaded areas have a higher population. The southern portions of the state are more heavily populated than north.

MAP: Population⁶



⁶ Note that the reference to “Census, 2010” in this and other maps refers to the Census Bureau’s county line boundaries from the 2010 census. The data that is being mapped, however, is based on Census data as of 2013.

Age

Michigan, like the rest of the United States, is experiencing a demographic shift towards an older population. In 2014 the median age in Michigan was 39.3 years according to American Community Survey 5-Year Estimates – almost two years older than the national average. That figure is 10.7 percent higher than in the 2000 Census (35.5). Over the same period, median age in the United States only increased about six percent, going from 35.3 to 37.4 years. The table below breaks down population data by age cohort for Michigan in comparison to the country as a whole.

TABLE: Age				
Age Cohort	No. of People in Age Group	Percent of People in Age Group	No. of People in Age Group	Percent of People in Age Group
	United States	United States	Michigan	Michigan
Under 5 years	19,973,711	6.4%	578,977	5.9%
5 to 9 years	20,460,355	6.5%	622,670	6.3%
10 to 14 years	20,698,883	6.6%	657,095	6.6%
15 to 19 years	21,510,534	6.8%	704,179	7.1%
20 to 24 years	22,407,472	7.1%	706,269	7.1%
25 to 34 years	42,310,182	13.5%	1,178,517	11.9%
35 to 44 years	40,723,040	13.0%	1,225,372	12.4%
45 to 54 years	44,248,186	14.1%	1,452,255	14.7%
55 to 59 years	20,623,001	6.6%	710,287	7.2%
60 to 64 years	17,973,759	5.7%	611,323	6.2%
65 to 74 years	23,993,984	7.6%	795,071	8.0%
75 to 84 years	13,364,813	4.3%	447,599	4.5%
85 years and over	5,819,164	1.9%	199,410	2.0%
Median Age	37.4	--	39.3	--
Source: 2010-2014 ACS 5-Yr Estimates (DP05)				

There were 578,977 persons under the age of 5 in Michigan according to 2010-2014 ACS estimates – 5.9 percent of the population. The largest age cohort in the state was 45 to 54 years with 14.7 percent of the total population (1,452,255 persons). Of particular note, persons between 25 and 34 years of age, often referred to as the “Millennial Generation” are underrepresented at only 11.9% of the population

compared to 13.9% nationally. Put another way, the Millennial cohort in Michigan is approximately 12% smaller than the national average.

A significant driver for this fact is the out-migration of Millennials, which appear to be leaving Michigan at a disproportionately high rate. The table below examines this trend. By comparing the population in the 10-19 age cohort in 2000 and the 25-34 age cohort in 2014 across states in the region we see evidence that Millennials are migrating out of Michigan. Michigan saw 24.47% net reduction in number of Millennials between 2000 and 2014, equating to 288,362 fewer members of this age cohort. While other states in the Midwest also saw losses among this age cohort, Michigan had the largest reduction in the region in both absolute and percentage terms while, nationally, the number of millennials increased by over 1.5 million.

TABLE: Millennial Cohort Population Change (Count)				
	10-19 Age Cohort (2000)	25-34 Age Cohort (2014)	Change in Millennial Population	Percent Change in Millennial Population
Michigan	1,466,879	1,178,517	-288,362	-24.47%
Wisconsin	810,269	727,998	-82,271	-11.30%
Indiana	896,898	835,979	-60,919	-7.29%
Illinois	1,799,099	1,781,319	-17,780	-1.00%
Ohio	1,644,679	1,440,377	-204,302	-14.18%
United States	40,747,962	42,310,182	1,562,220	+3.69%

Source: 2010-2014 ACS 5-Year Estimates DP05, 2000 Decennial Census QT-P1

The following table compares the population percentages of key age cohorts in Michigan, the United States, and the counties in Michigan with the highest concentration of people aged 65 and older. In 2000, the proportion of people under the age of 18 in the US as a whole and Michigan were very similar, 25.7% and 26.1%, respectively. Within the counties that currently have a disproportionately high number of elderly individuals have a much lower under-18 population, including four counties that are at least 5% lower than the national figure. By 2014 the number of counties that are 5% lower or more than the national figure increased to ten. This population shift points to a significant outmigration of families and young adults in the last 14 years.

When we look at the data for the 18-64 age cohort we see a similar picture. In 2000, there were seven counties that had a proportion of the working age population that was 5% or more lower than the national figure. By 2014, nine of the ten counties had figures 5% lower than the national figure. Again, this points to an outmigration of working and college age individuals and families outside of these counties.

As working age families and college age students move to other places to find employment or go to college, they are likely to have families, set up roots, and not return to their home counties. Due to this, the percentage of elderly in those counties increases and this pattern has accelerated over time. In 2000, only four counties had an elderly population that was 10% or more higher than the national figure, but by 2014 all ten counties were 10% or higher than the national figure. Similarly, in 2000 five counties had a median age that was 10 years higher than the national average, but by 2014 all ten counties had a median age 10 years higher than the national average.

On the state level it appears outmigration that is shifting the population distribution. Nationally, between 2000 and 2014 the median age increased by 2.1 years, but in Michigan the median age increased by 3.8 years. The majority of this shift comes from the Under 18 age cohort which is shrinking faster in Michigan than the country as a whole. In the US as a whole, the Under 18 cohort shrank by 2.2 percentage points between 2000 and 2014, but in Michigan it shrank by 3.1 percentage points from 26.1% to 23.0% during the same time period. This seems to point to Millennials and young Generation X'ers moving out of Michigan and raising their families in other states.

	Under 18		College & Working Age (18-64)		Elderly (65+)		Median Age	
	2000	2014	2000	2014	2000	2014	2000	2014
United States	25.7%	23.5%	61.9%	62.8%	12.4%	13.7%	35.3	37.4
Michigan	26.1%	23.0%	61.6%	62.5%	12.3%	14.6%	35.5	39.3
Lake County	21.9%	17.3%	58.4%	57.8%	19.7%	24.9%	43.1	51.0
Keweenaw County	22.5%	18.0%	57.2%	54.3%	20.3%	27.7%	44.9	53.2
Ontonagon County	20.2%	14.3%	58.2%	56.5%	21.6%	29.2%	45.9	54.8
Iron County	20.6%	16.8%	54.2%	58.4%	25.2%	27.2%	45.4	52.9
Leelanau County	24.4%	17.9%	58.2%	56.2%	17.4%	25.9%	42.6	50.7
Roscommon County	20.0%	15.2%	56.2%	56.0%	23.8%	28.8%	47.2	54.2
Presque Isle County	20.9%	16.7%	56.7%	61.1%	22.3%	27.7%	45.1	52.5
Montmorency County	20.3%	15.9%	55.8%	56.1%	23.9%	28.0%	47.0	53.9
Oscoda County	23.3%	19.7%	56.5%	55.2%	20.2%	25.0%	43.7	50.8
Alcona County	19.0%	13.7%	56.5%	53.2%	24.5%	33.2%	49.0	56.3
Iosco County	22.4%	16.7%	56.0%	56.2%	21.6%	27.1%	44.2	51.7

Source: 2010-2014 ACS 5-Year Estimates S0101, 2000 Decennial Census QT-P1

Elderly

Persons aged 65 and over comprise a higher percentage of Michigan's population than that of United States as a whole. Approximately 14.5 percent of the state's population was over the age of 65 (1,442,080 persons) – compared to the nation at 13.8 percent (2010-2014 ACS). The percent of people aged 85 years and older is similar in the state (2%) and the nation (1.9%).

As people age they develop a unique set of needs in terms of social services, healthcare, and housing, and as communities across the nation grow proportionately older, the needs of the elderly become an increasingly important aspect of both public and private decision making. Integral among these evolving needs is that of housing – housing that is decent, safe, affordable, accessible and located near services and transportation. Housing is a linchpin among the needs of the elderly because the affordability, location, and accessibility of where one lives directly impacts the ability to access health and social services – both in terms of financial cost and physical practicality. As a 2014 study from Harvard's Joint Center for Housing Studies further explains:

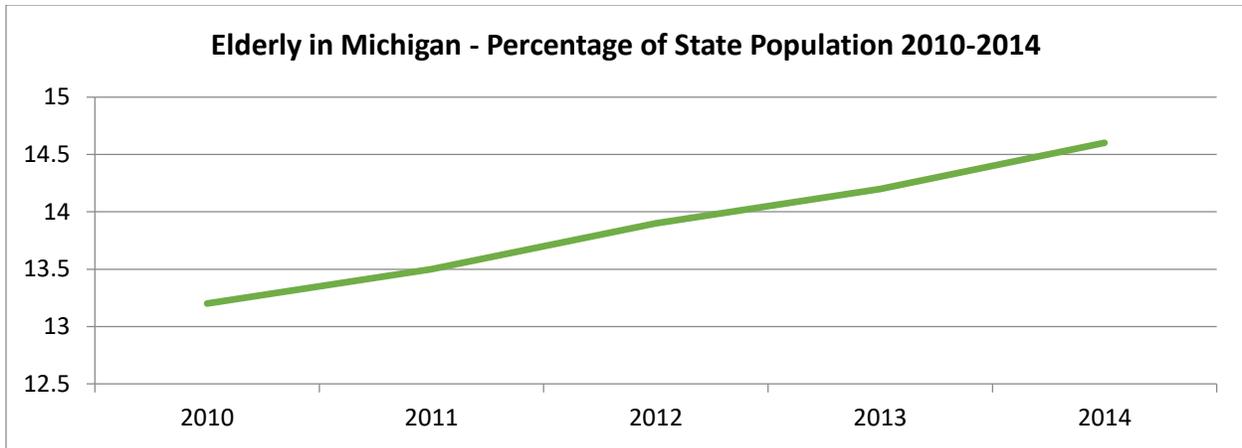
“Accessibility is essential to older adults' health and safety as physical and cognitive limitations increase. Proximity of housing to stores, services, and transportation enables older adults to remain active and productive members of their communities, meet their own basic needs, and maintain social connections. And for those with chronic conditions and disabilities, the availability of housing with supports and services determines the quality and cost of long-term care—particularly the portion paid with public funds.

But the existing housing stock is unprepared to meet the escalating need for affordability, accessibility, social connectivity, and supportive services.

- *High housing costs force millions of low-income older adults to sacrifice spending on other necessities including food, undermining their health and well-being.*
- *Much of the nation's housing inventory lacks basic accessibility features, preventing older adults with disabilities from living safely and comfortably in their homes.*
- *The nation's transportation and pedestrian infrastructure is generally ill-suited to those who cannot or choose not to drive, isolating older adults from friends and family.*
- *Disconnects between housing programs and the health care system put many older adults with disabilities or long-term care needs at risk of premature institutionalization.”⁷*

With a population growing older at rates higher than the nation as a whole, housing issues among the elderly will become increasingly salient to Michigan's policy makers in the years to come.

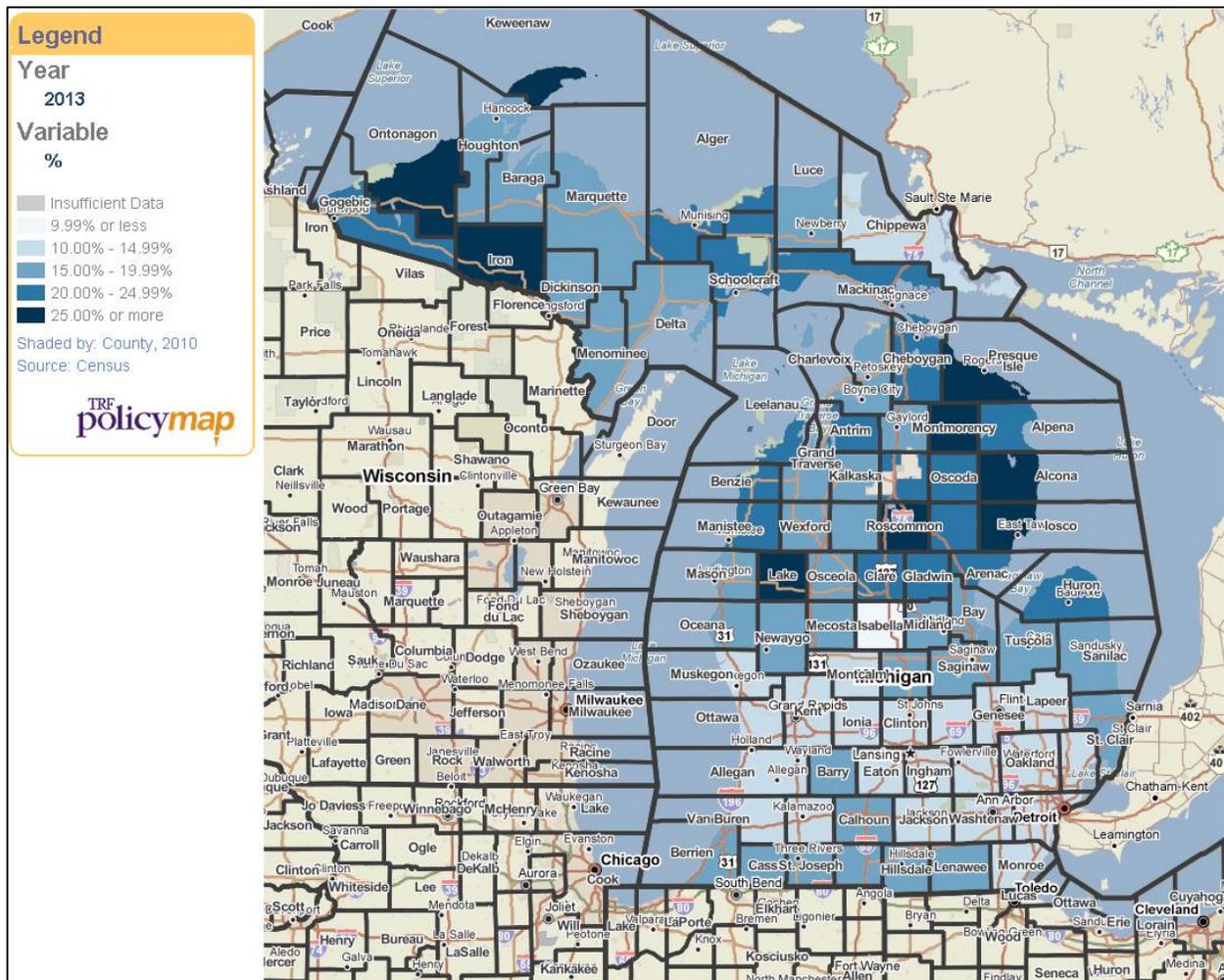
⁷ Joint Center for Housing Studies of Harvard University, *Housing America's Older Adults*
Retrieved from: http://www.jchs.harvard.edu/research/housing_americas_older_adults



Data Source: 2010-2014 American Community Survey 5-Yr Estimates

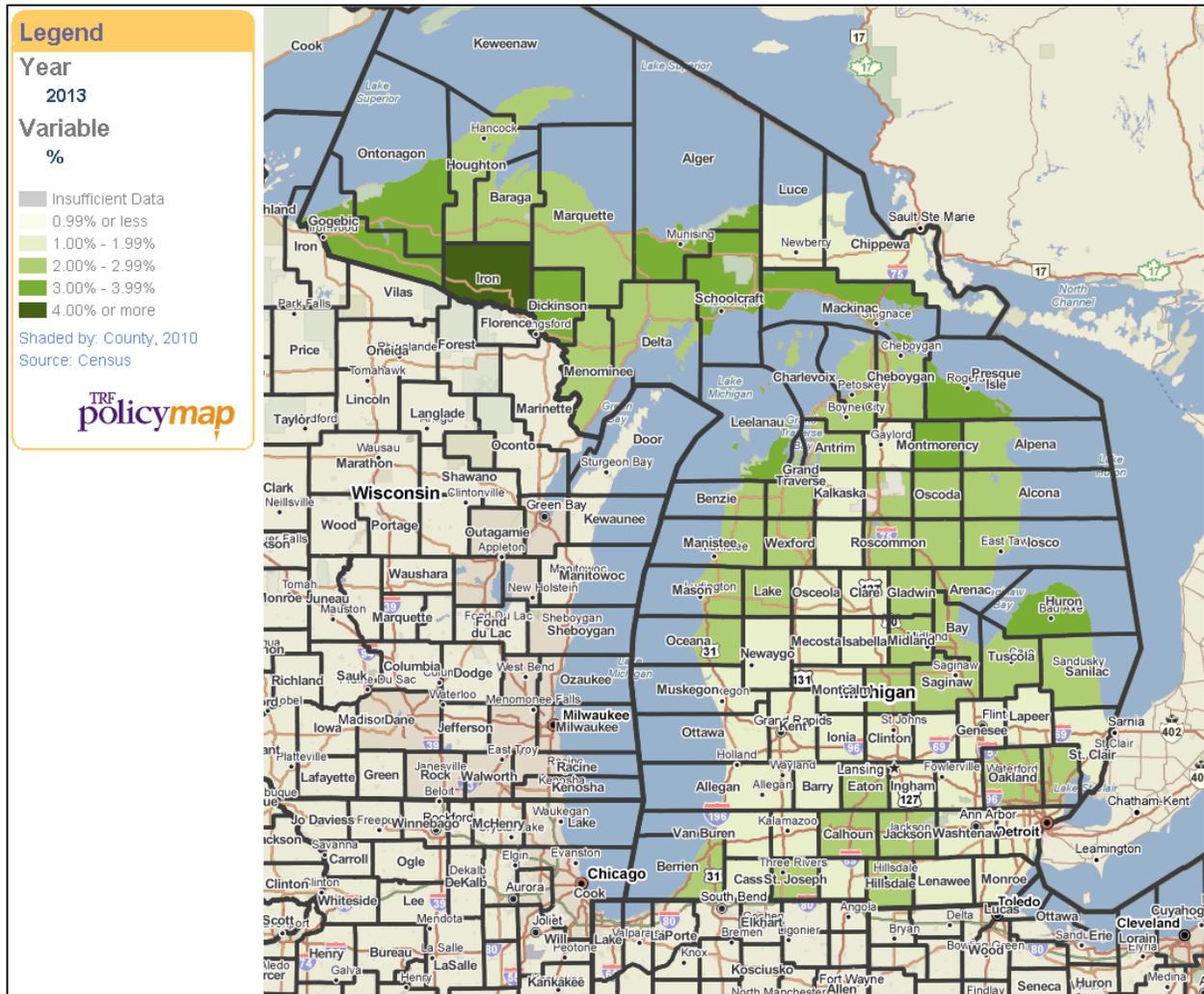
The chart above visually displays the change in the population of the elderly in the state from 2010 to 2014. In that time period the percentage of the population in Michigan that is elderly has been steadily rising.

MAP: Elderly 65 Years and Older



The lighter shaded areas have a lower concentration of people aged 65 and older, and the darker areas have a higher concentration. In the darkest blue areas, people aged 65 and over make up over 25% of the population. People aged 65 years and over are more highly concentrated in the northern areas of Michigan. Counties near the major metropolitan areas, in particular, have a lower concentration of the population over the age of 65. Outmigration is possible source of the discrepancy across the state, younger individuals are likely to leave rural, northern counties for college or jobs and not return.

MAP: Elderly 85 Years and Older



Similarly, elderly 85 years and older make up more of the population in the northern areas of the state. The lighter shaded areas represent a lower concentration of people aged 85 and older, and the darker shades represent a higher concentration.

Age Dependency Ratios

Age dependency ratios relate the number of working-aged persons to the number of dependent-aged persons (children and the elderly). These indicators provide insight into the social and economic impacts of shifts in the age structure of a population. Higher ratios of children and the elderly require higher levels of services to meet the specific needs of those populations. Furthermore, a higher degree of burden is placed on an economy when those who mainly consume goods and services become disproportionate to those who produce. It is important to note that these measures are not entirely precise – not everyone under the age of 18 or over 65 is economically dependent, and not all working age individuals are

economically productive. With these caveats in mind, dependency ratios are still helpful indicators in gauging the directional impacts of shifting age structures.

An area’s dependency ratio is comprised of two smaller ratios – the child dependency ratio and the old-age dependency ratio. In 2014 Michigan’s overall dependency ratio was 60.2, slightly higher than the US ratio of 59.3. This ratio was driven by the state’s old-age dependency ratio of 23.4, which was higher than the national ratio of 21.9. Michigan community leaders at all levels should keep this indicator on their radars going forward so they can adequately respond to the challenges of an aging population.

TABLE: Age Dependency Ratio 2014			
	Age dependency ratio	Old-Age dependency ratio	Child dependency ratio
Michigan	60.2	23.4	36.8
United States	59.3	21.9	37.4
Source: 2010-2014 ACS 5-Yr Estimates (S0101)			

Rising age dependencies can be expected to continue in Michigan. A 2010 US Census report on aging trends in the United States provides insight into the extent of the coming shift in the United States: “By 2030, all of the baby boomers will have moved into the ranks of the older population. This will result in a shift in the age structure, from 13 percent of the population aged 65 and older in 2010 to 19 percent in 2030.” As this shift occurs the working age population will simultaneously be shrinking. Sixty percent of the nation’s population was aged 20-64 in 2010. The Census estimates that by “2030, as the baby boomers age, the proportion in these working ages will drop to 55 percent.”⁸

Paying attention to changes in old-age dependency ratios is especially pertinent for communities with declining populations such as many of Michigan’s non-entitlement counties. A shrinking working age population means fewer workers producing goods and services, and consequently generating less tax revenue. All the while, the aging population increases demand for social services, healthcare, and housing for the elderly. The intersection of these two trends presents a unique challenge for communities in the coming years. While part of a national trend, in Michigan, this phenomenon has been exacerbated by the apparent out-migration of younger age cohorts, particularly the Millennial Generation.

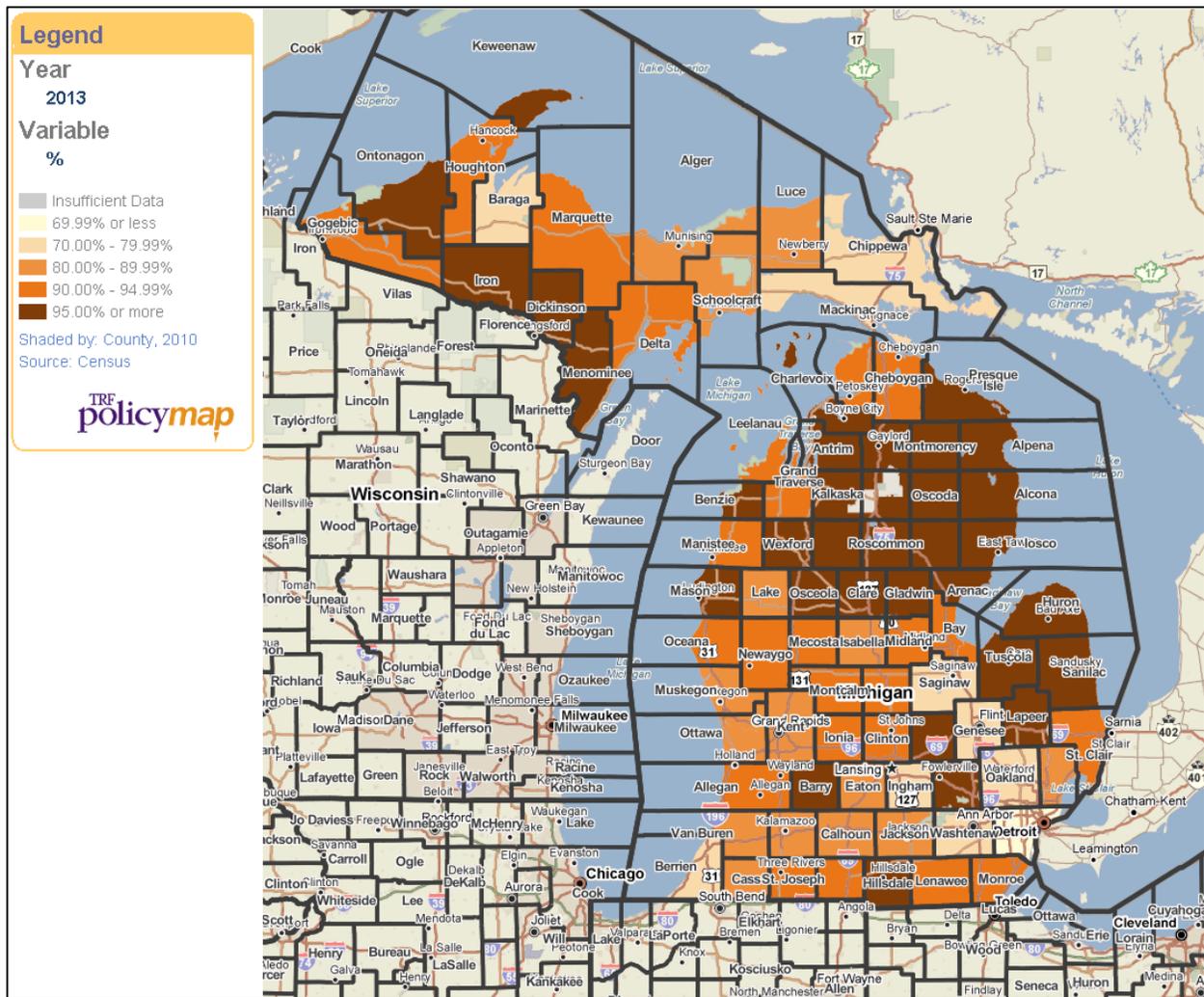
⁸ US Census Bureau, *The Next Four Decades: The Older Population in the United States: 2010 to 2050*. Retrieved from: <https://www.census.gov/prod/2010pubs/p25-1138.pdf>

Race and Ethnicity

According to 2014 ACS 5-Year Estimates, White was the largest racial group in Michigan (79.2%), followed by Blacks or African Americans (14.0%). All other races made up the remaining 6.9 percent. Approximately 4.6 percent of the population identify as ethnically Hispanic. (Persons can identify as both ethnically Hispanic and racially as another group.) The table below provides a detailed breakdown of the racial and ethnic composition of Michigan compared to that of the United States as a whole.

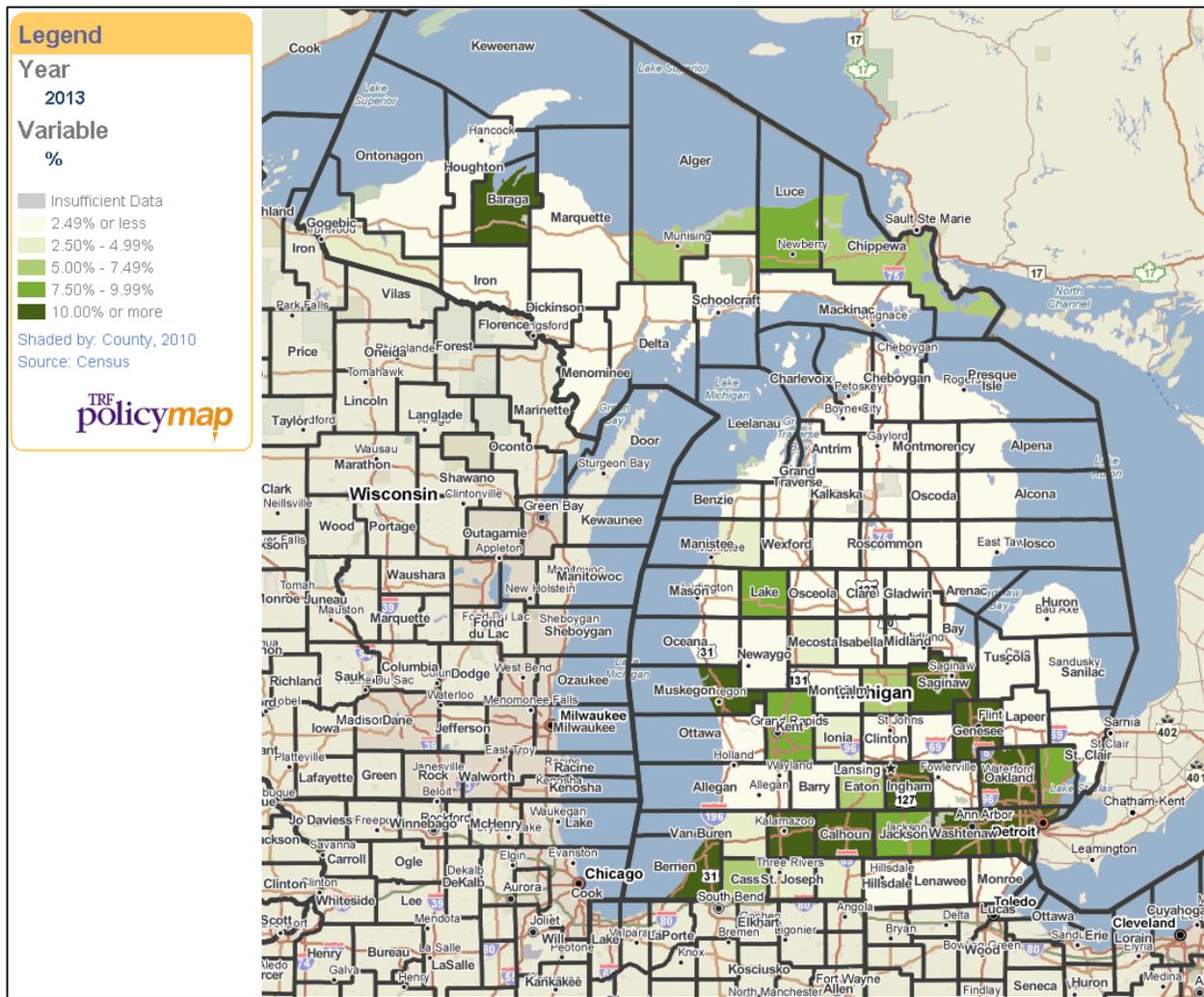
TABLE: Racial and Ethnic Composition				
Race	United States	%	Michigan	%
White	231,849,713	73.8%	7,829,621	79.2%
Black or African American	39,564,785	12.6%	1,383,205	14.0%
American Indian and Alaska Native	2,565,520	0.8%	54,960	0.6%
Asian	15,710,659	5%	258,567	2.6%
Native Hawaiian and Other Pacific Islander	535,761	0.2%	1,995	0.0%
Some other race	14,754,895	4.7%	107,141	1.1%
Two or more races	9,125,751	2.9%	253,535	2.6%
Hispanic or Latino (of any race)	53,070,096	16.9%	457,109	4.6%
Source: 2010-2014 ACS 5-Yr Estimates (DP05)				

MAP: White



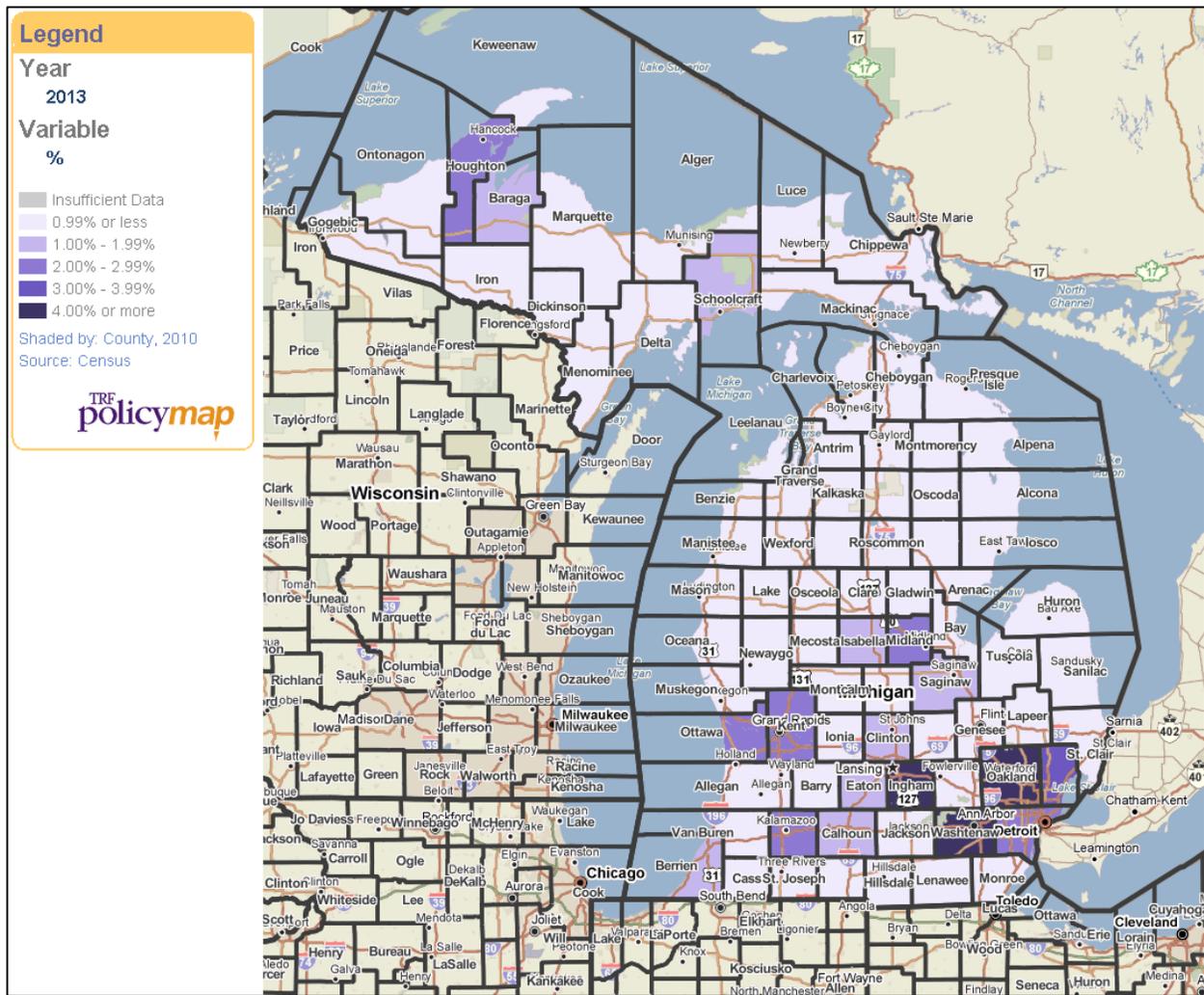
While Whites were the most prominent race in Michigan with 79.2 percent of the population statewide, the White population varied in concentration throughout the state (2014 ACS). The lighter areas have a lower concentration of Whites, and the darker areas have a higher concentration. In the darkest orange shaded areas—largely in the “Thumb,” northeastern Lower Peninsula, and western Upper Peninsula—more than 95 percent of the population is White.

MAP: Black or African American



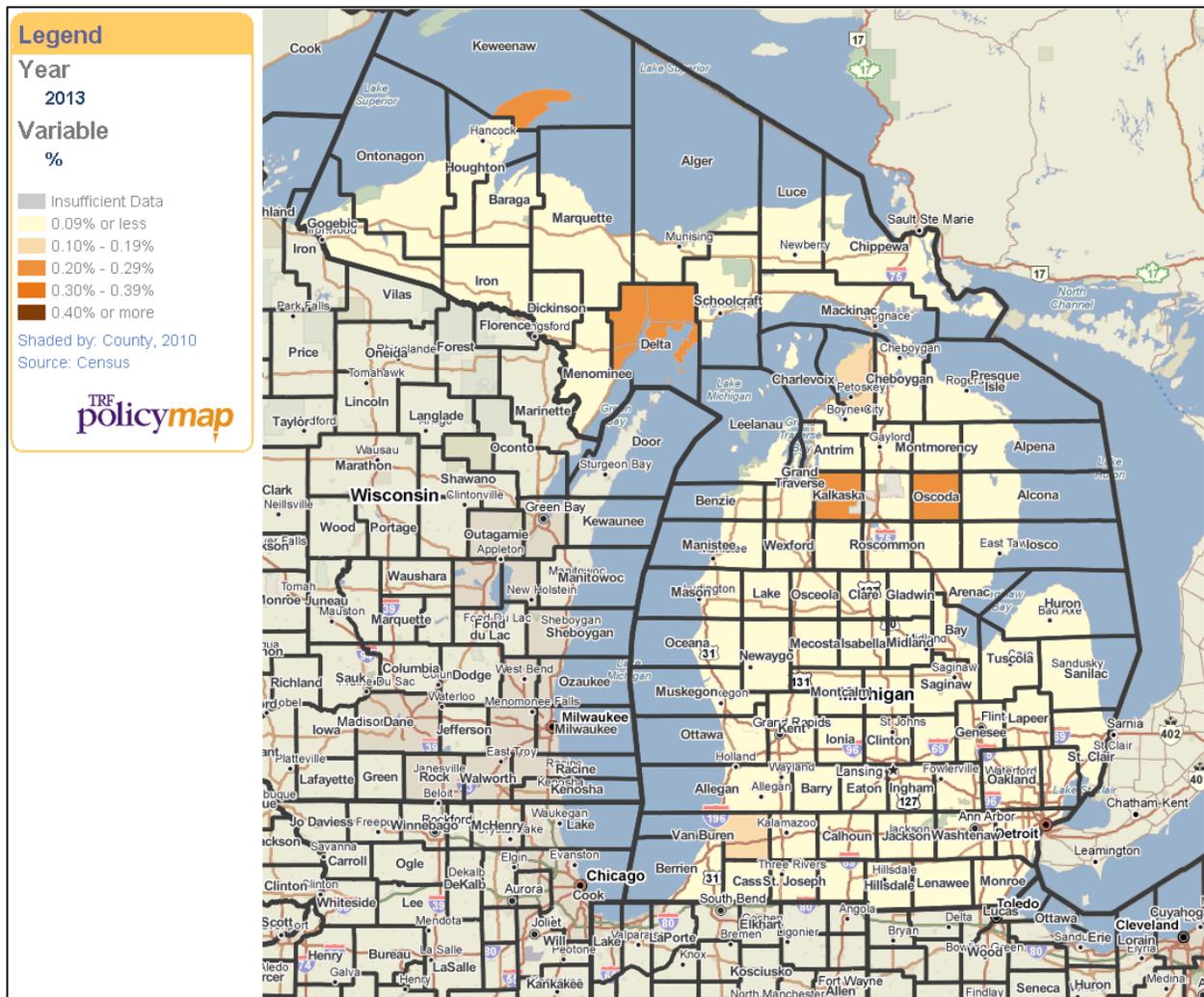
While Blacks or African Americans in Michigan were 14 percent of the population statewide, the racial group had a stronger concentration in the southern areas of the state with the exception of a few counties in Upper Peninsula (2014 ACS). The lighter shaded areas have a lower concentration of Blacks or African Americans, and the darker areas have a higher concentration.

MAP: Asian



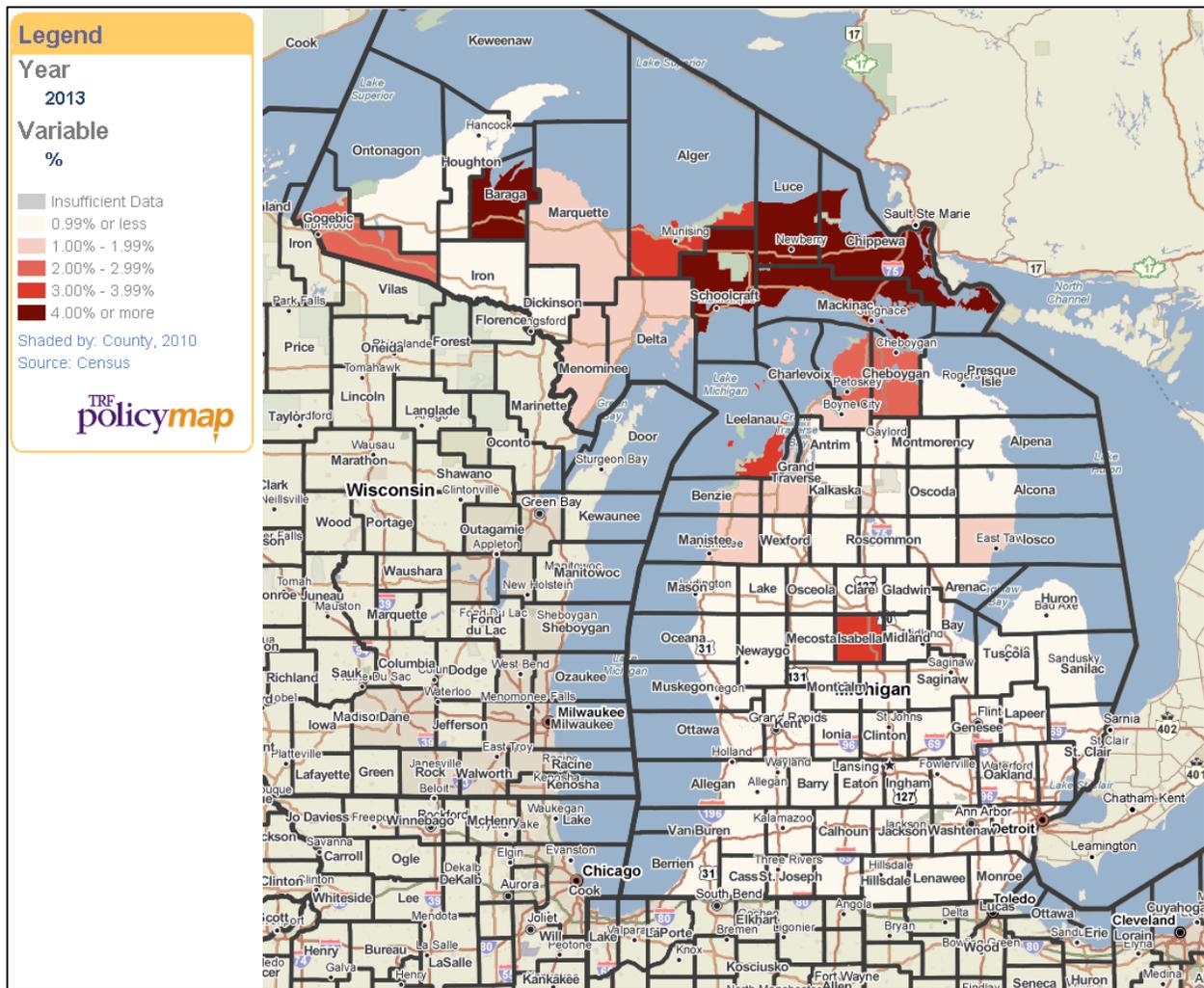
While Asians in Michigan were 2.6 percent of the population statewide, the racial group had the strongest concentration around the Metro Detroit area (2014 ACS). It should be noted Asians were the fastest growing race group in the state from 2000 to 2014 going from 176,510 persons to 258,567 in that time period – an increase of 46 percent (2000 Census, 2014 ACS). The lighter shaded areas have a lower concentration of Asians, and the darker areas have a higher concentration.

MAP: Hawaiian or Other Pacific Islander



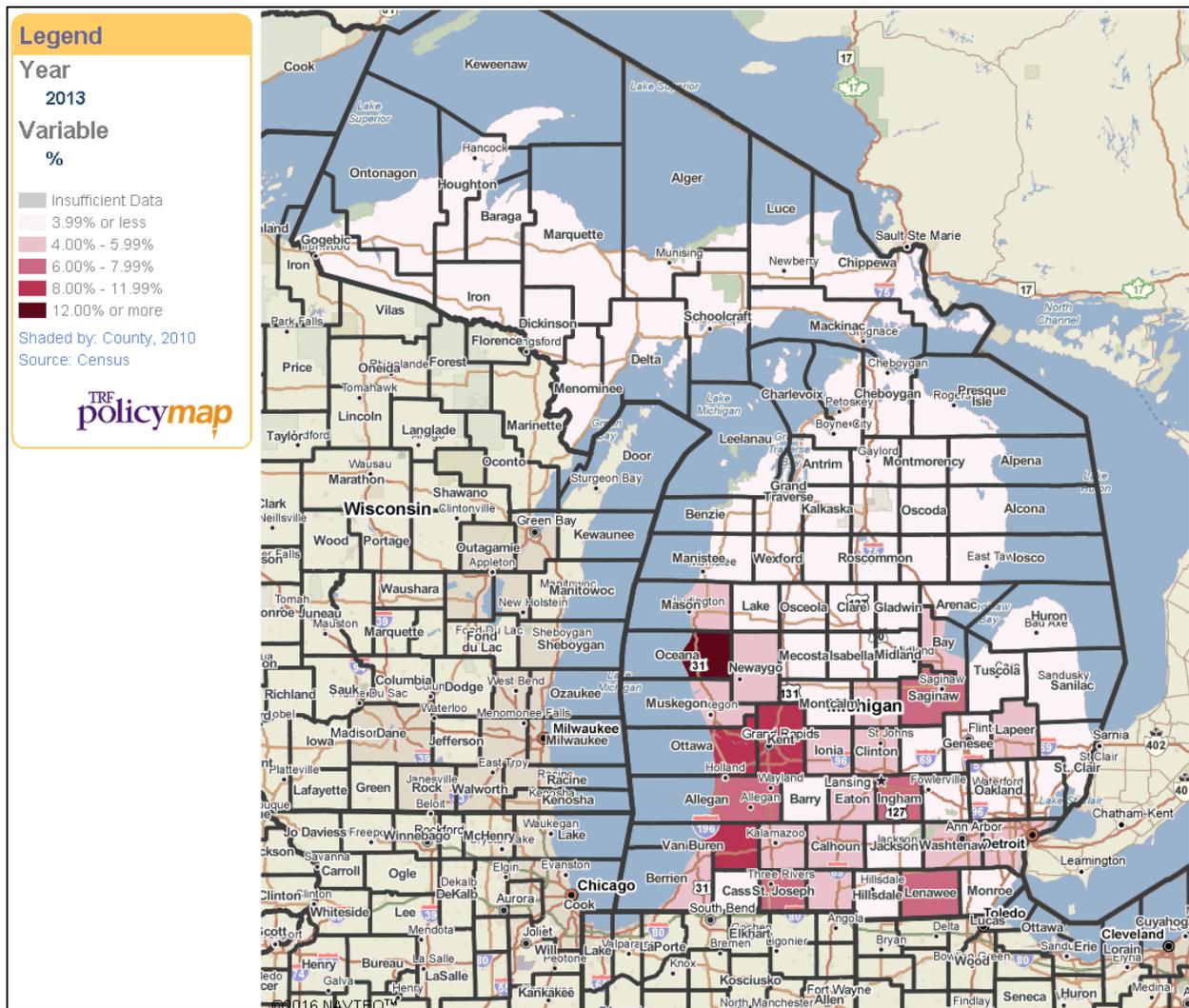
Hawaiians or Pacific Islanders make up a small portion of Michigan’s population, and can be found almost exclusively in Keweenaw, Delta, Kalkaska and Oscoda counties. The shading on this map can be deceptive – the lightest shaded areas have a less than 0.09 percent concentration of Hawaiians or Pacific Islanders, but the darker areas only have a concentration of over 0.40 percent.

MAP: American Indian or Alaskan Native



Native American Indians or Alaskan Natives are much more densely populated in the Upper Peninsula than in the rest of the state. The lightest shaded areas have a lower concentration (0.99% or less) of Native American Indians or Alaskan Natives, and the darkest areas have a higher concentration (over 4.0%).

MAP: Hispanic or Latino



While Hispanics or Latinos in Michigan were 4.6 percent of the population statewide, the ethnic group had a stronger concentration in the southwest areas of the State, with over 12 percent in Oceana County (2014 ACS). The Hispanic and Latino population in the state grew from 2000 to 2014, from 323,877 persons to 457,109 in that time period – an increase of 41 percent (2000 Census, 2014 ACS). The lighter shaded areas have a lower concentration of Hispanic or Latino residents, and the darker areas have a higher concentration.

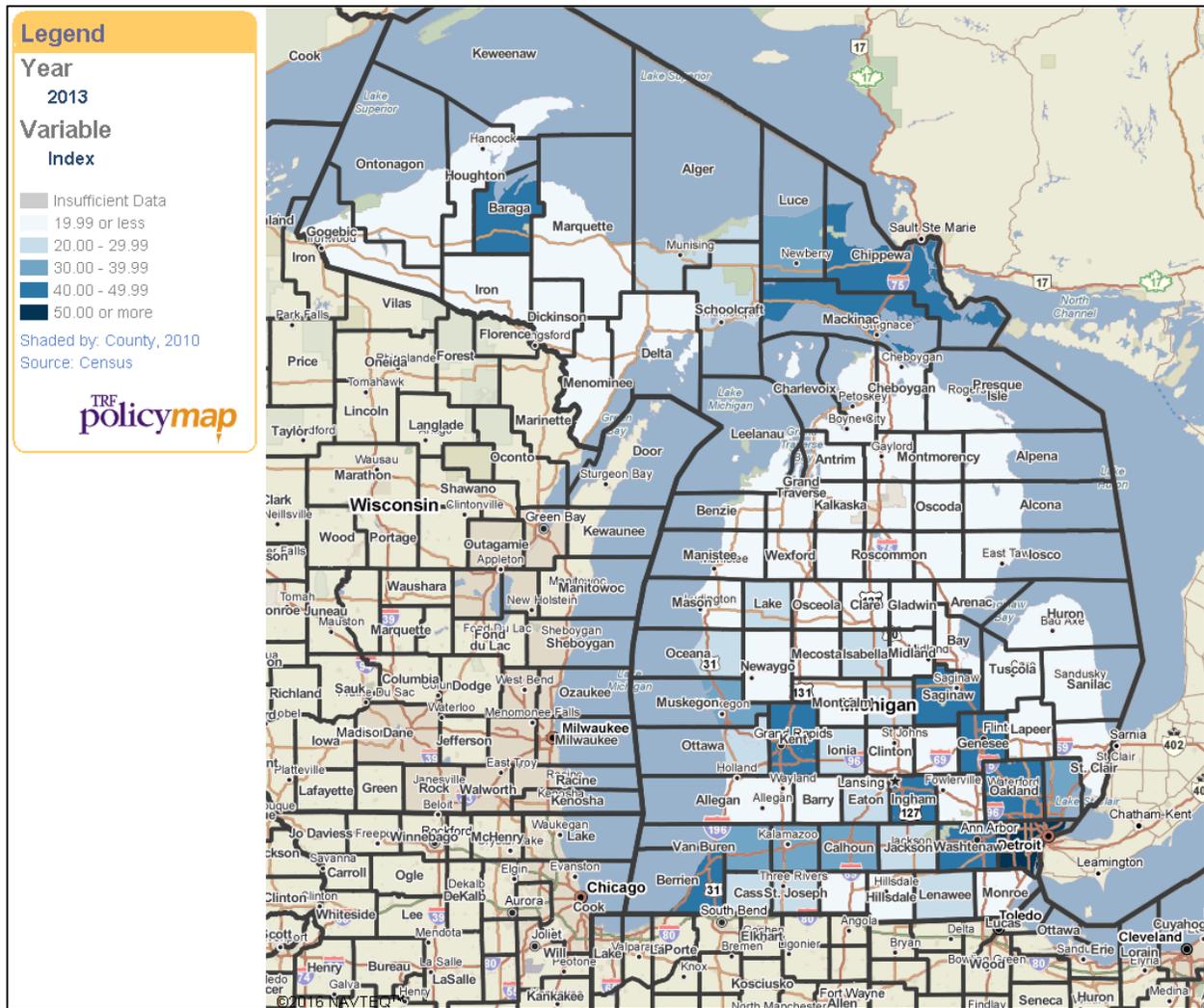
Diversity

The following map displays the Diversity Index ranking for counties throughout Michigan, based on data from Policy Map. As Policy Map explains: “The diversity index is an index ranging from 0 to 87.5 that

represents the probability that two individuals, chosen at random in the given geography, would be of different races or ethnicities between 2009-2013. Lower index values between 0 and 20 suggest more homogeneity and higher index values above 50 suggest more heterogeneity. Racial and ethnic diversity can be indicative of economic and behavioral patterns. For example, racially and ethnically homogenous areas are sometimes representative of concentrated poverty or concentrated wealth. They could also be indicative of discriminatory housing policies or other related barriers.”

Lighter shaded counties carry lower Diversity Index scores (meaning less diverse), and darker shaded counties carry higher scores (meaning more diverse). Southern areas of Michigan, especially the Metro Detroit area (Wayne County), display a higher diversity index than the rest of the state, with the exception of some counties in the Upper Peninsula. It should be noted that the map of the Diversity Index, while valuable, does not provide a nuanced view beyond the county level. It is likely that within each county there are areas of high segregation and low diversity.

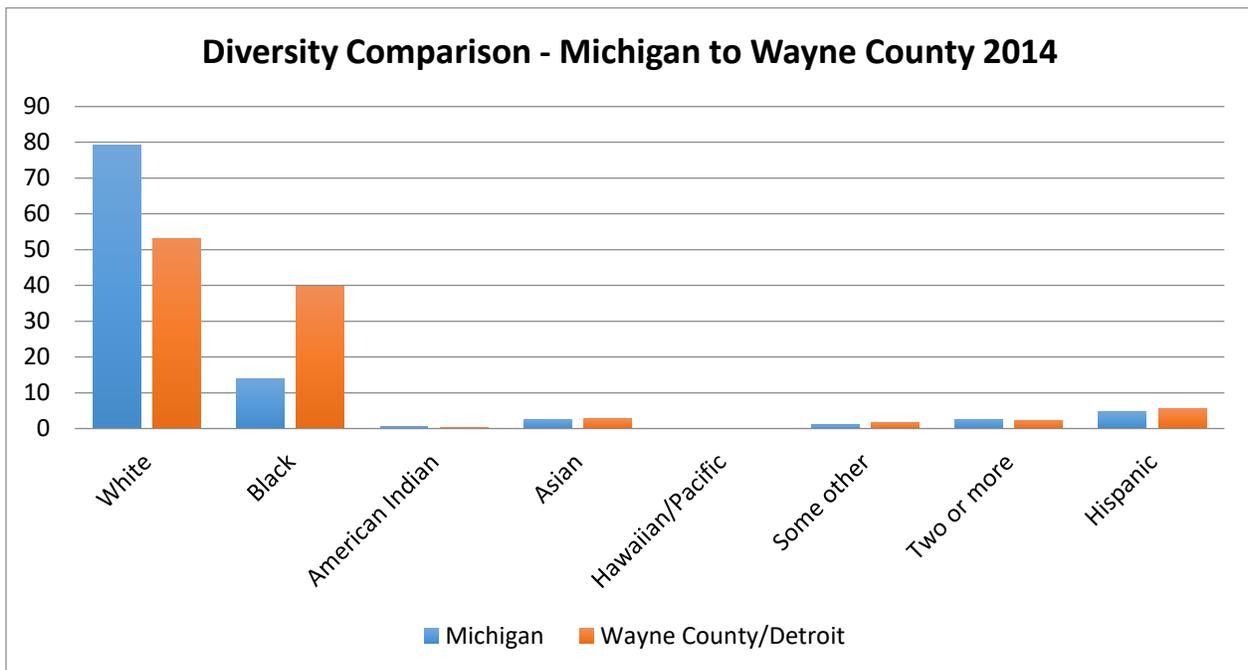
MAP: Diversity



As seen in the map above Wayne County (Detroit Metro area) is more diverse than the rest of the state.

TABLE: Racial and Ethnic Composition Comparison – Michigan to Wayne County		
Race	Michigan	Wayne County (Detroit Metro)
Total Population	9,889,024	1,790,078
Non-White	20.8%	46.9%
Source: 2010-2014 ACS 5-Yr Estimates (DP05)		

While Michigan as a whole was 20.8 percent non-White, almost half of Wayne County (46.9%) was non-White. The largest difference from a minority race group was Blacks or African Americans: the statewide rate is 14 percent, but Wayne County was 39.7 percent Black or African American. All other minority race groups fell within one (1) percent of the statewide percentage. As Wayne County (Detroit) is the primary metro area and transportation hub in Michigan, the population in the county makes up 18.1 percent of the total population of the state. The chart below displays visually the diversity comparison between Wayne County and the state as a whole.



Data Source: 2010-2014 ACS 5-Yr Estimates (DP05)

Disability

According to 2014 ACS 5-Year estimates, 1,362,413 Michigan residents had a disability – 13.9 percent of the total state population, which is 1.6 percent higher than the national rate. In addition to barriers such as housing discrimination and the difficulty of finding accessible units, people with disabilities face financial hardships at rates much higher than the average person. In Michigan, only 29.4 percent of working age individuals with a disability were employed according to 2014 ACS estimates. The statewide employment rate for persons without a disability was almost twice as high at 54.4 percent. Furthermore, when disabled persons are employed they earn significantly less than the non-disabled. In 2014 the median earnings for disabled persons in Michigan was \$17,206, compared to \$28,979 for those without a disability. Unsurprisingly, the poverty rate among the state’s disabled was 24.1 percent – more than fifty percent higher than the rate of 15.7% amongst the non-disabled (2010-2014 ACS). In light of these depressed economic conditions, decent and affordable housing remains firmly out of the reach for a large portion of the disabled population.

The table below provides data on the extent of disabilities amongst differing age cohorts for both the United States and Michigan. Approximately 36.4 percent of elderly persons in the state had a disability – a total of 510,356 elderly individuals with a disability. Among working age adults, a Michigan resident is almost 19% more likely to have a disability.

TABLE: Disability and Age				
	United States	%	Michigan	%
Persons with a disability	37,874,571	12.3%	1,362,413	13.9%
Population under 5 years	161,265	0.8%	5,161	0.9%
Population 5 to 17 years	2,830,108	5.3%	107,193	6.3%
Population 18 to 64 years	19,703,061	10.2%	739,703	12.1%
Population 65 years and over	15,180,137	36.3%	510,356	36.4%
Source: 2010-2014 ACS 5-Yr Estimated (S1810)				

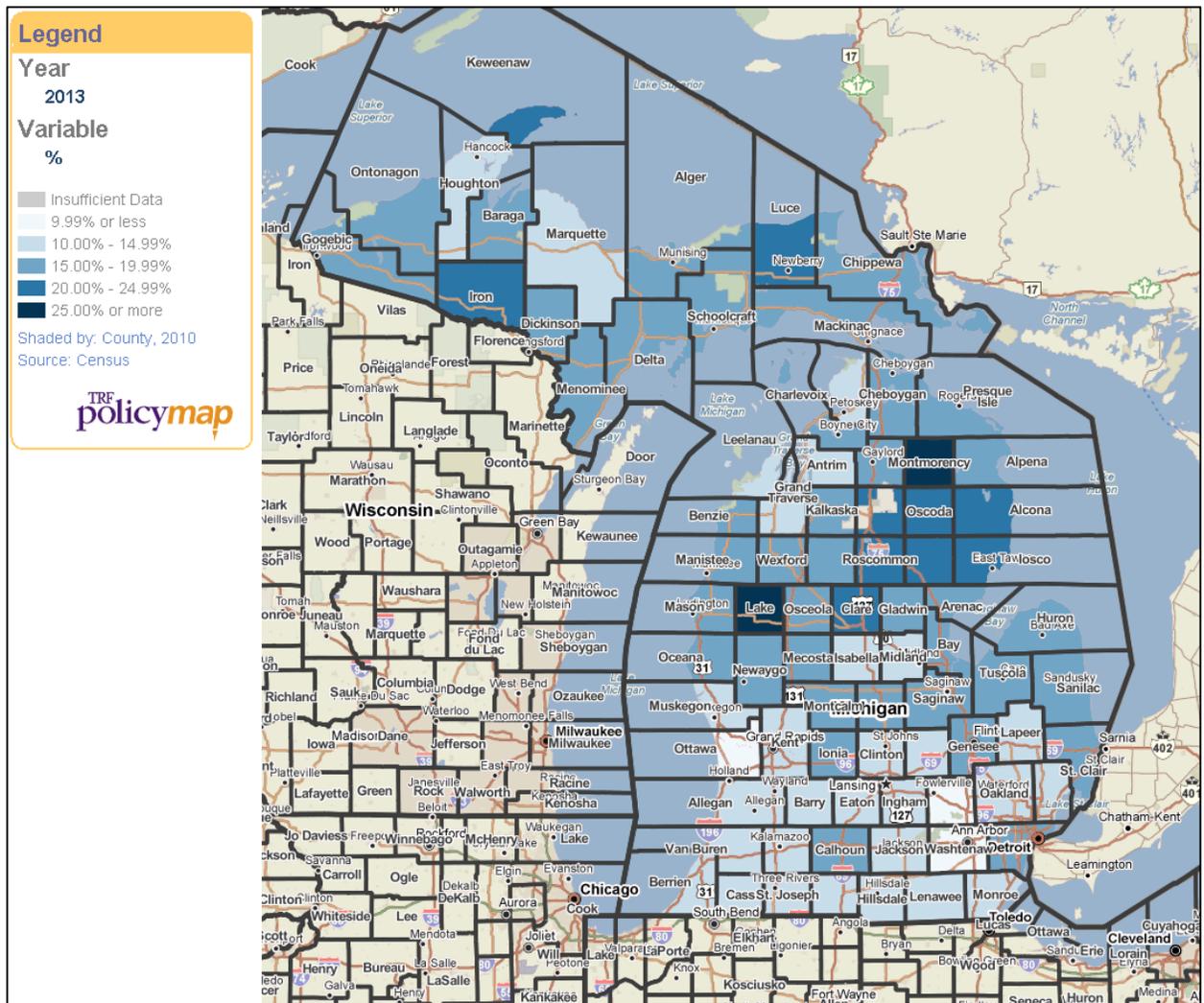
Disability and Race

The following table provides data on the extent of disabilities among different racial and ethnic groups for both the United States and Michigan. Every racial group in the state, except Asians, had a disability rate higher than the national average.

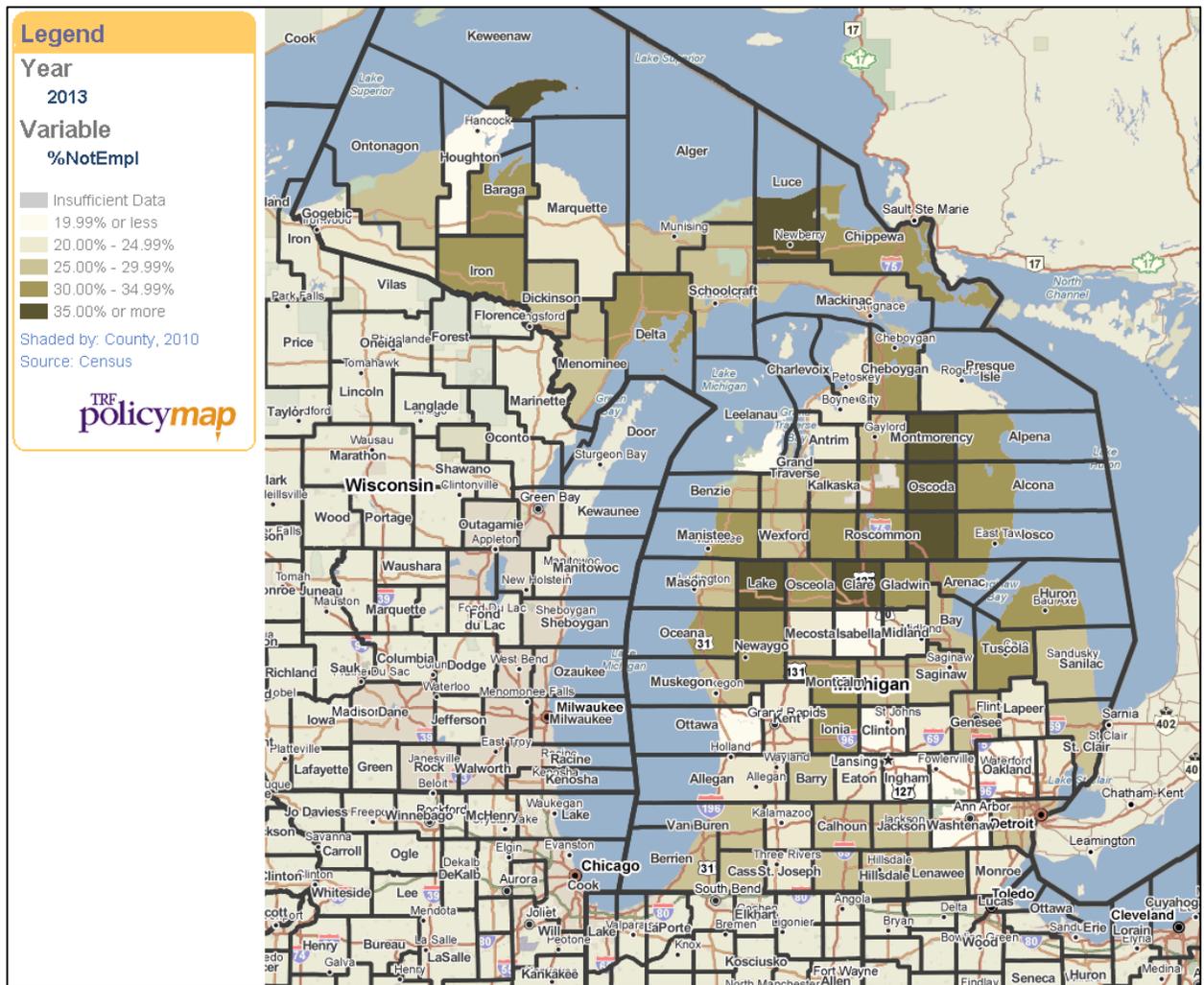
TABLE: Disability and Race				
	United States	%	Michigan	%
White	28,975,110	12.7%	1,055,280	13.6%
Black or African American	5,294,368	13.8%	236,378	17.6%
American Indian and Alaska Native	408,497	16.3%	11,068	20.6%
Asian	1,029,256	6.6%	13,814	5.4%
Native Hawaiian and Other Pacific Islander	51,695	9.9%	342	17.6%
Some other race	1,132,429	7.8%	10,857	10.2%
Two or more races	983,216	11.0%	34,674	13.9%
Hispanic or Latino (of any race)	4,466,899	8.5%	44,119	9.8%
Source: 2010-2014 ACS 5-Yr Estimates (S1810)				

The next maps show the geographic distribution of people with disabilities, looking specifically at unemployment, poverty, and age. The lighter shaded areas have a lower concentration of disability, and the darker areas have a higher concentration. The concentration of people with a disability was higher in the northern areas of Michigan than the rest of the state – especially in Lake County and Montmorency County where more than 25% of the population had a disability. The same pattern holds true for people who, in addition to being disabled, are unemployed or living in poverty. Elderly people with a disability are more concentrated in the northern portions of the state and in the eastern portion of the Upper Peninsula.

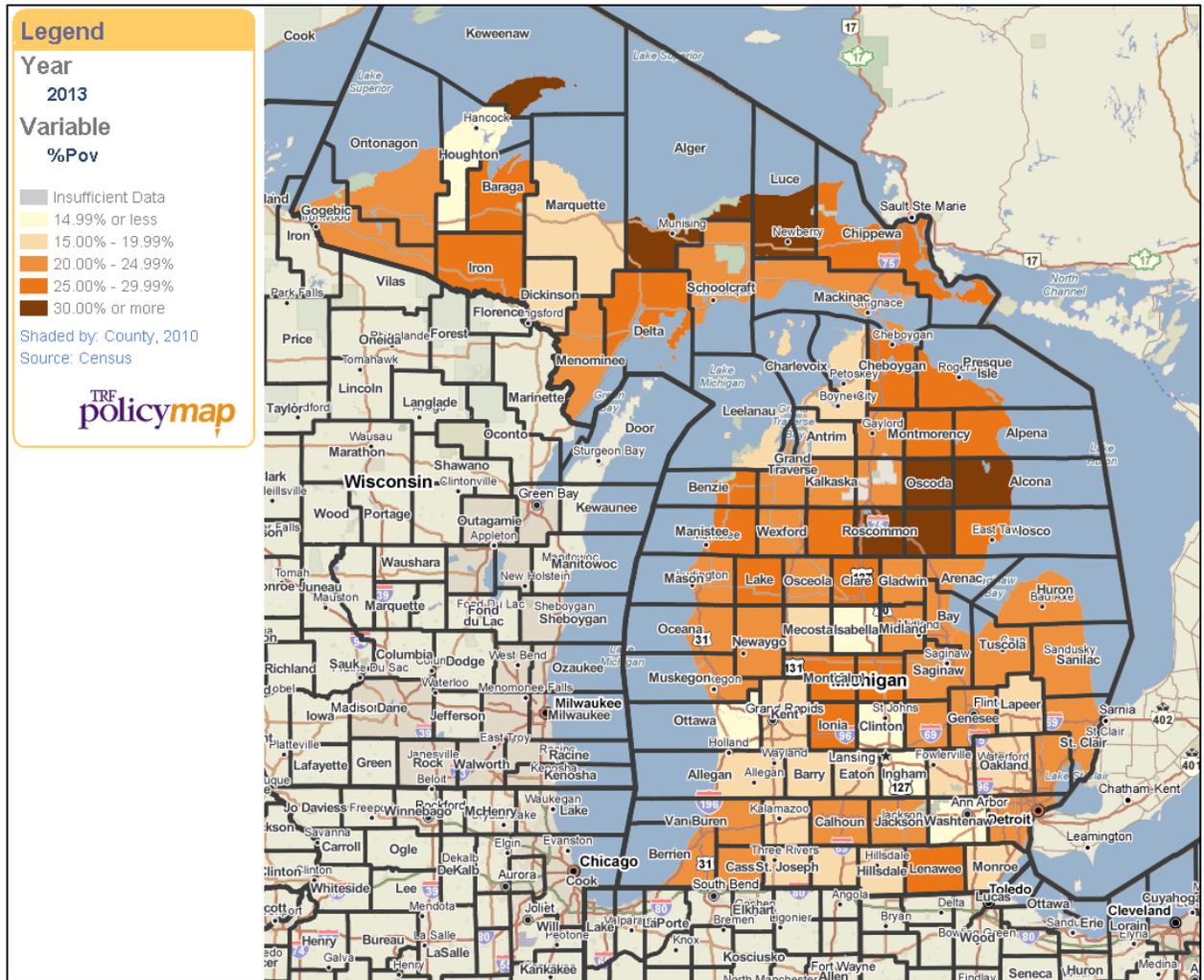
MAP: Persons with a Disability



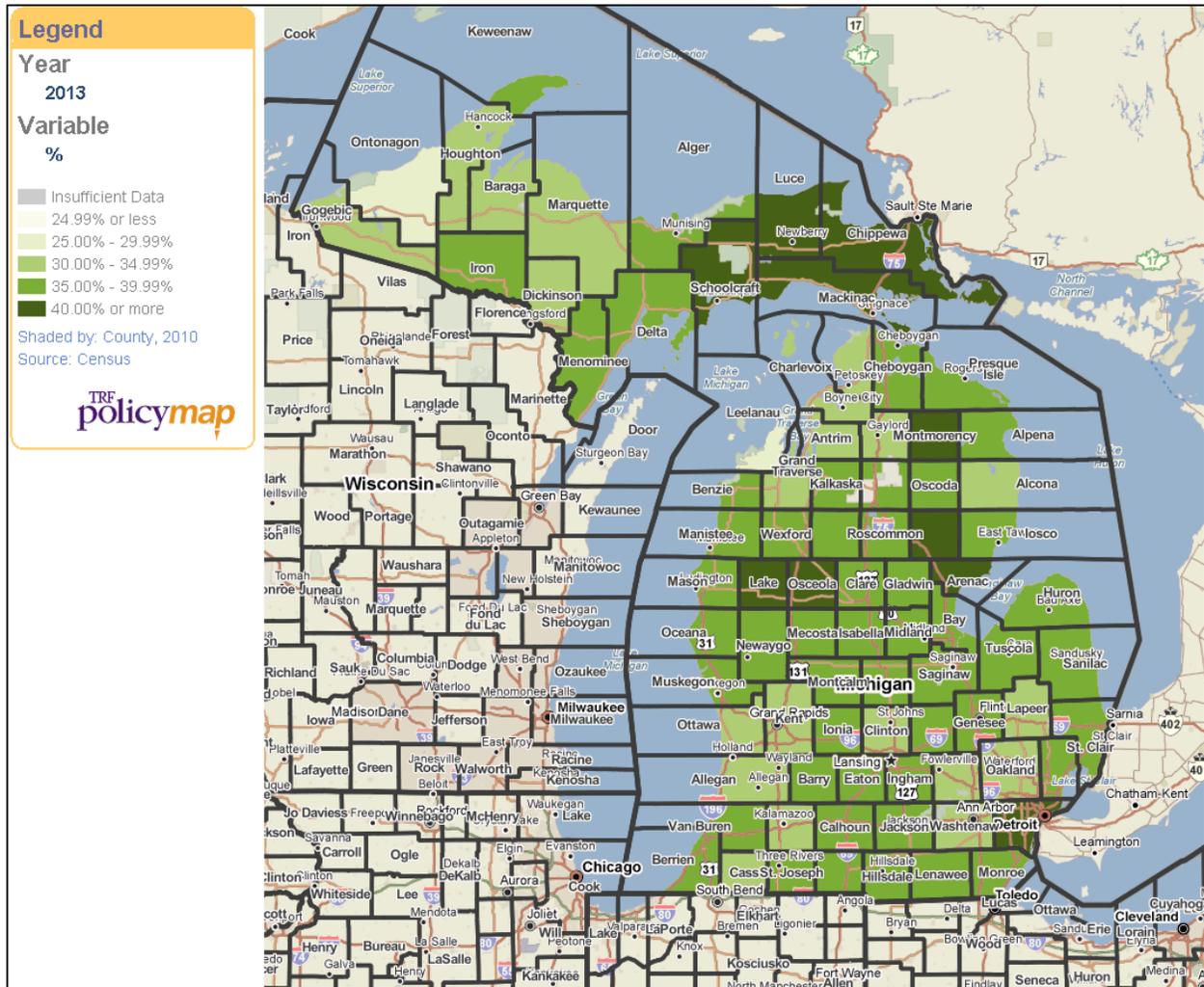
MAP: Unemployed with a Disability



MAP: Living in Poverty with Disability



MAP: Elderly with Disability



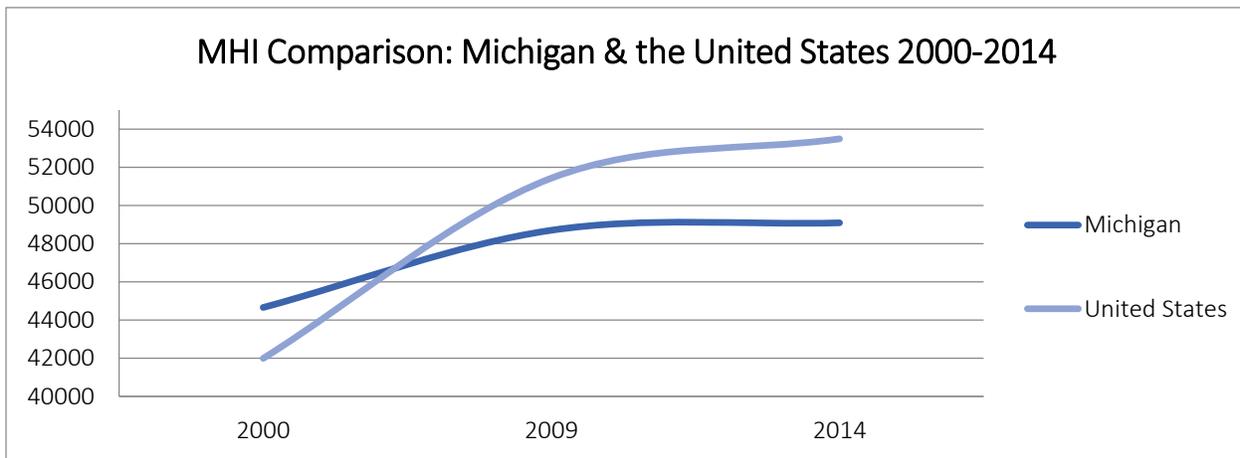
Income

According to 2010-2014 American Community Survey figures, the median household income (MHI) in Michigan was \$49,087. This was below the national MHI of \$53,482. The growth rate of the state’s MHI between 2000 and 2014 (9.9%) was also much lower than the national average (27.4%).

TABLE: Median Household Income (MHI) - 2000 to 2014				
	2000	2009	2014	% Change 2000-2014
Michigan	\$44,667	\$48,700	\$49,087	9.9%
United States	\$41,994	\$51,425	\$53,482	27.4%

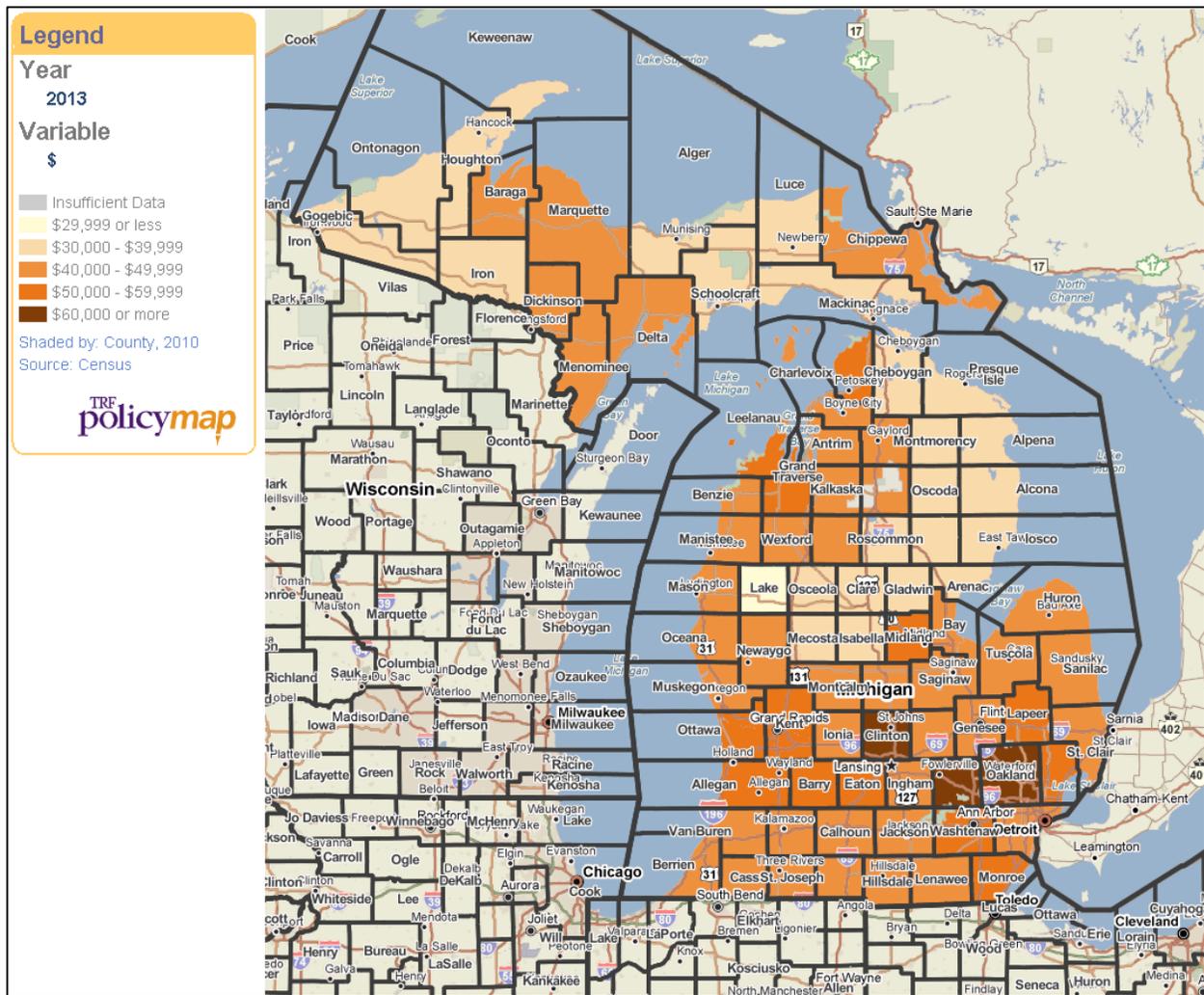
Source: 2000 Census, 2005-2009 ACS 5-Yr Estimates, 2010-2014 ACS 5-Yr Estimates (DP03)

According to the 2000 Census, Michigan actually had a higher MHI than the rest of the country, however MHI has since increased at a much faster rate nationwide. In fact, since 2009, MHI in Michigan increased less than one percent (0.8%), while MHI for the nation as a whole increased 4 percent. These trends can be seen in the table below.



Data Source: 2010-2014 American Community Survey 5-Yr Estimates (DP03)

MAP: Median Household Income

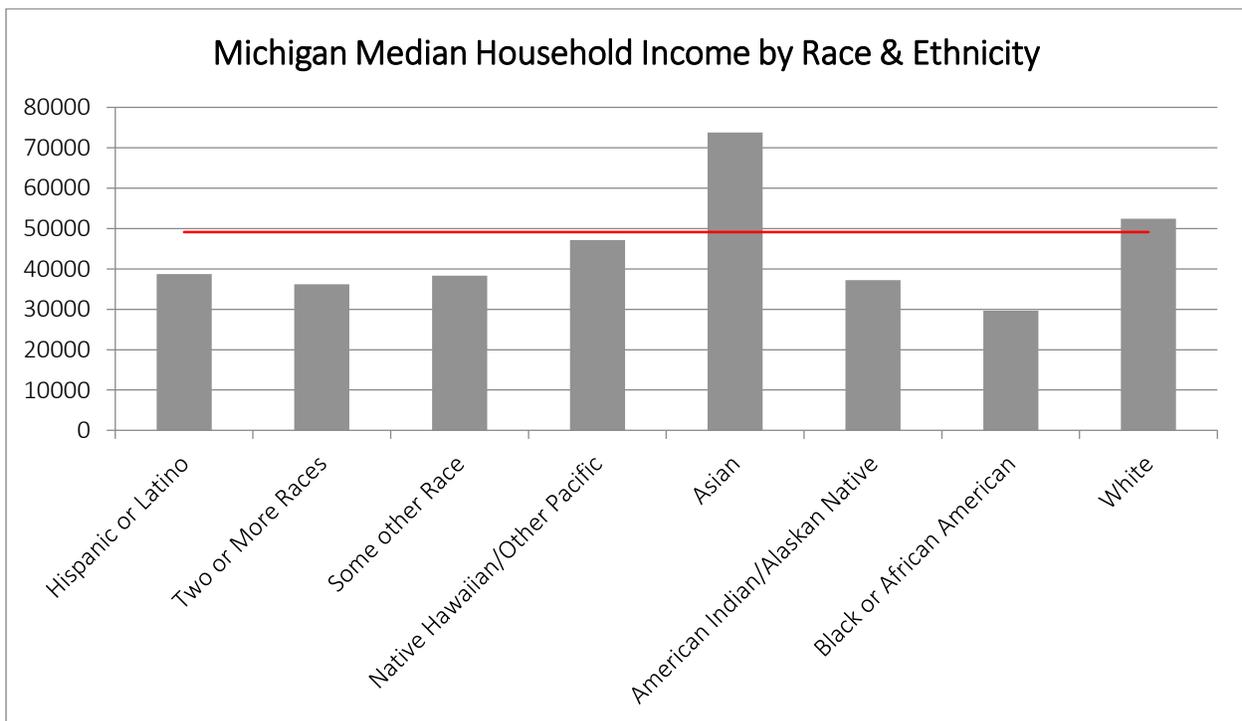


While the median household income in Michigan was \$49,087, the range of MHI throughout the state varied widely (2014 ACS). Livingston, Clinton, and Oakland counties had the highest MHI (\$60,000 or more) and Lake County had the lowest MHI (\$29,999 or less). The lighter shaded areas have a lower MHI, and the darker areas have a higher MHI.

Income and Race

The 2014 statewide median household income was \$49,087, but there was significant disparity among racial and ethnic groups. Whites, the largest racial group in Michigan by far, had an MHI of \$52,395 – slightly higher than the state median. Asian households, at \$73,809, earned significantly higher than the state median. It has been documented by a Pew Research Center 2013 report, “The Rise of Asian Americans,” that Asian-Americans are “more likely than the general public to live in multi-generational family households. Some 28% live with at least two adult generations under the same roof, twice the share of whites and slightly more than the share of African Americans and Hispanics who live in such households.” This demographic trend may be contributing to the higher median household income among Asian households, but further research would be needed to determine whether this or other factors contribute to these results.

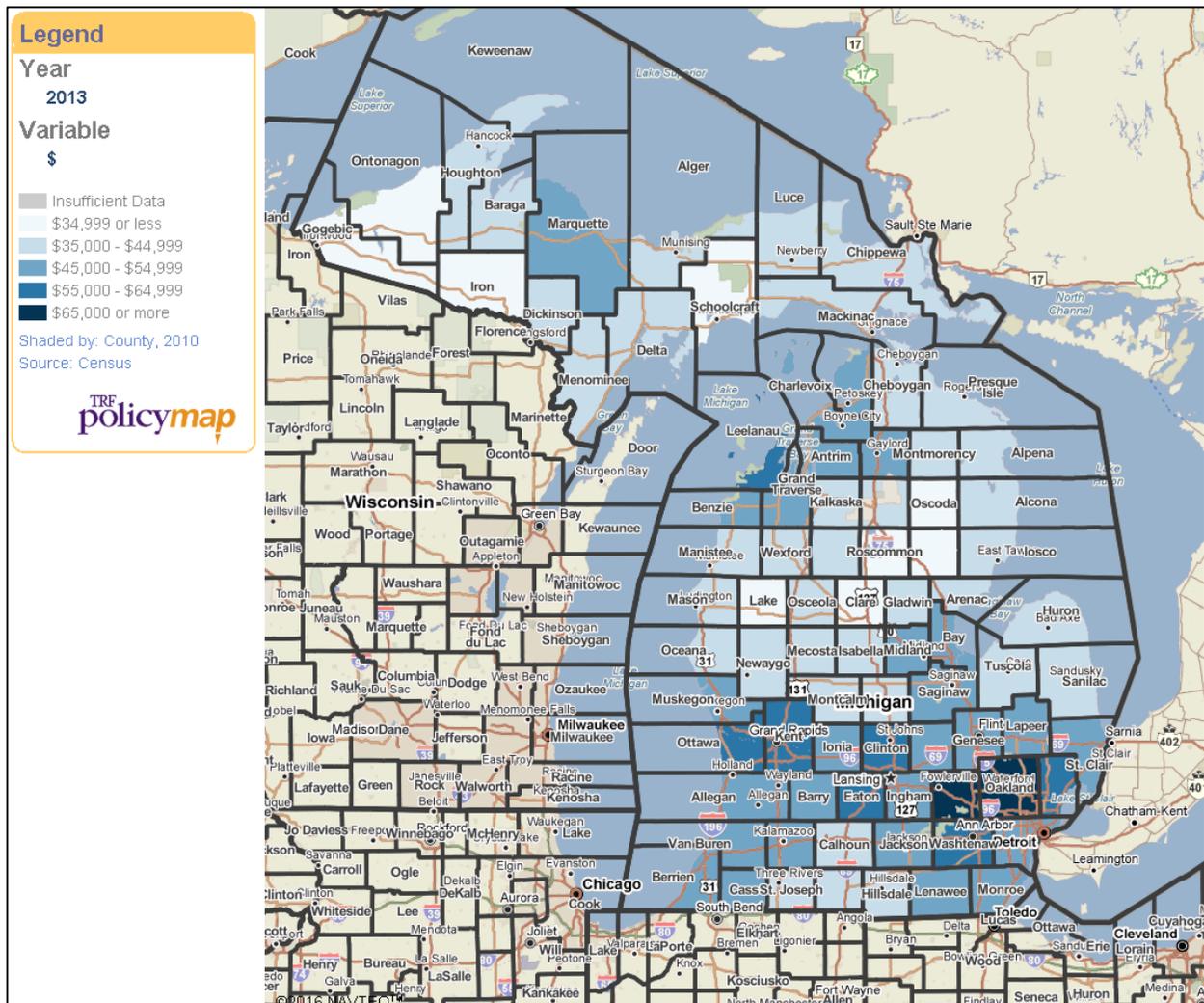
On average, Native Hawaiians and Other Pacific Islanders earned \$47,147 – a little less than the state MHI. All other races and ethnicities earned significantly less than the statewide MHI. Black and African American households earned only \$29,628 – just 66 percent of the state median. Hispanics or Latinos had an MHI of \$38,757 – still far below the state median. The following chart compares the 2014 median income earned by households based on race and ethnic group.



Data Source: 2010-2014 American Community Survey 5-Yr Estimates (S1903)

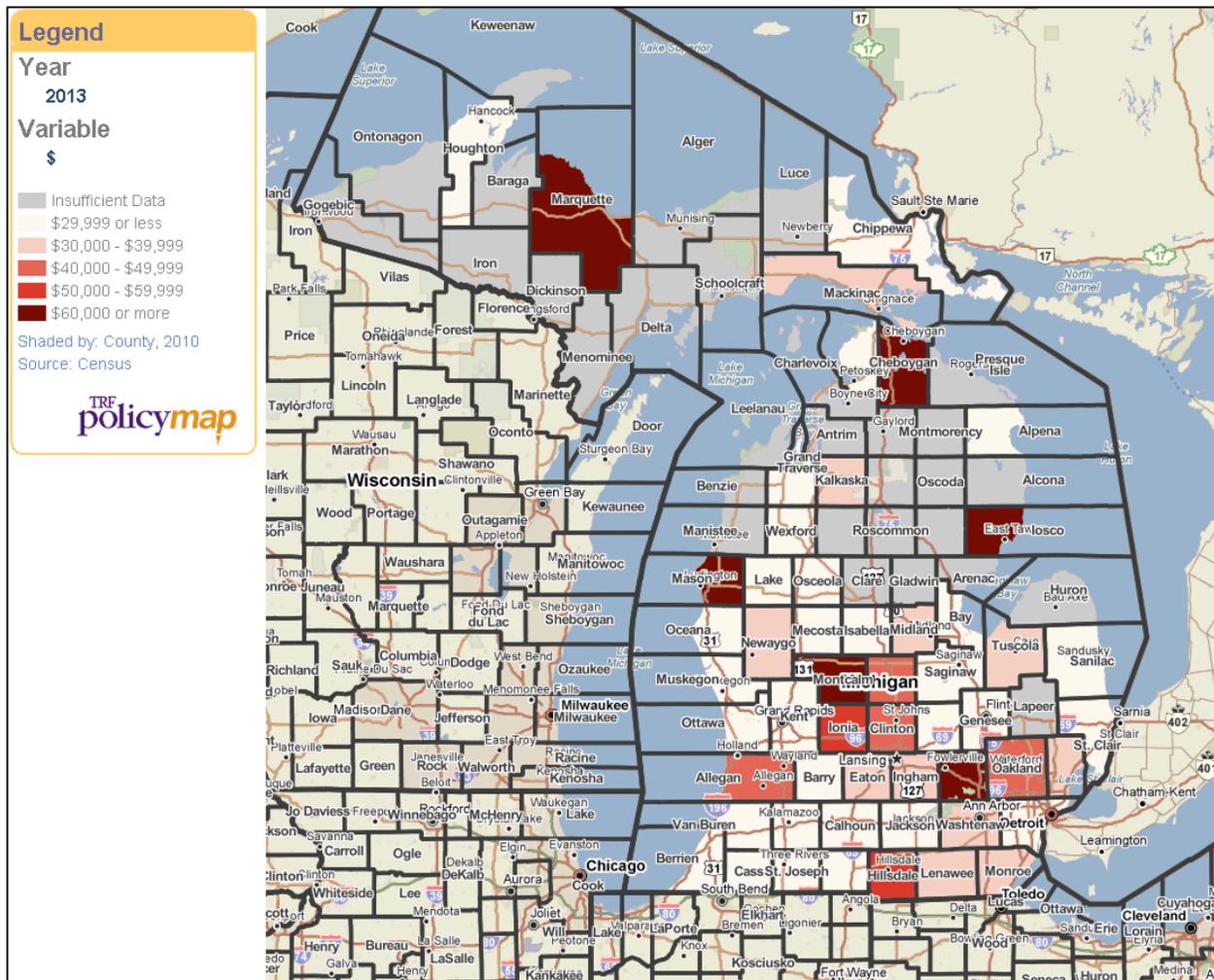
Data Note: The red line represents the statewide median household income of \$49,087

MAP: Median Household Income – White



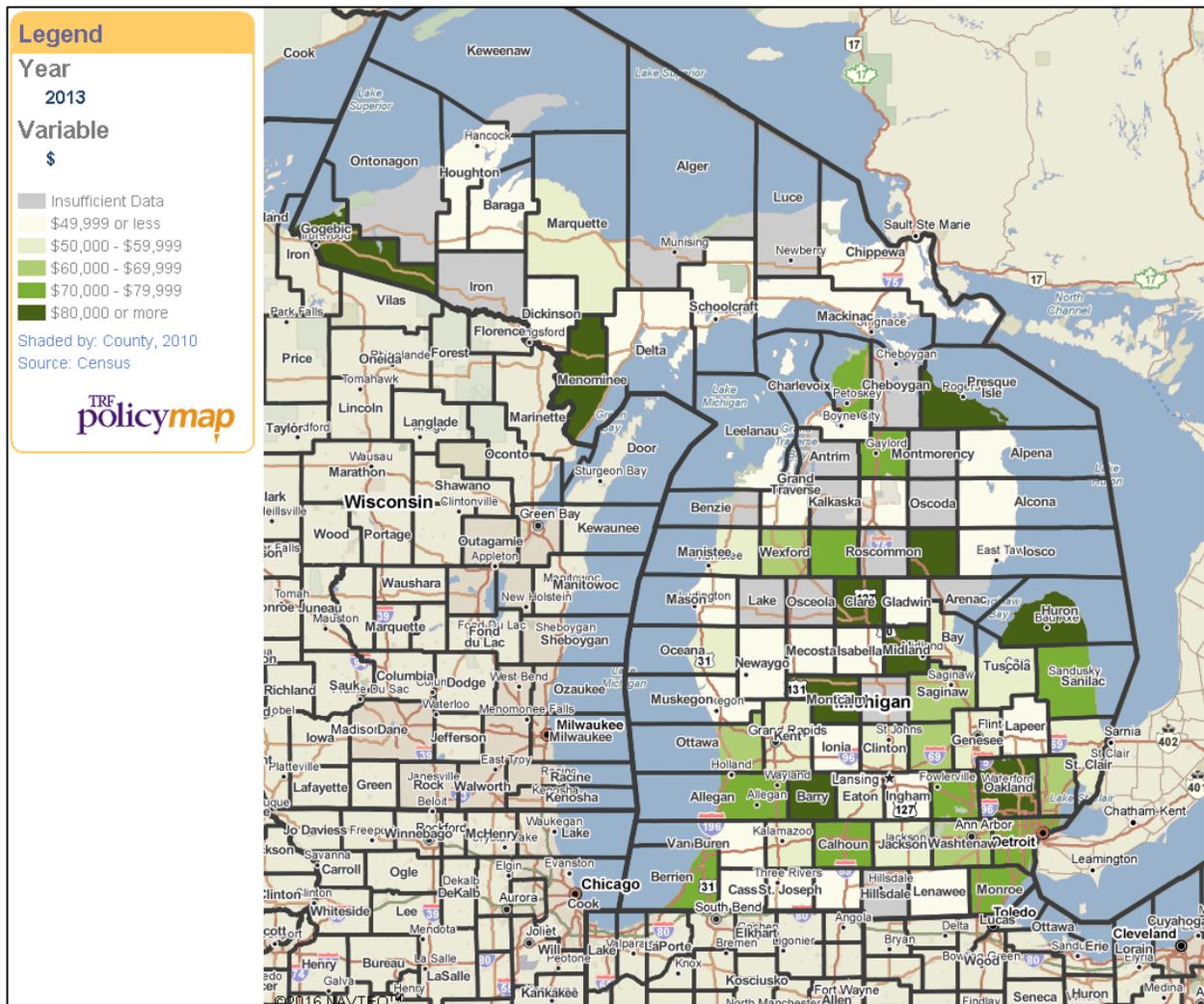
While the median household income for White households in Michigan was \$52,395, MHI for the race group was generally higher in the southern areas of the state (2014 ACS). White households in Livingston County and Oakland County had a MHI higher than \$65,000 per year. The lighter shaded areas have a lower MHI, and the darker areas have a higher MHI.

MAP: Median Household Income – Black or African American



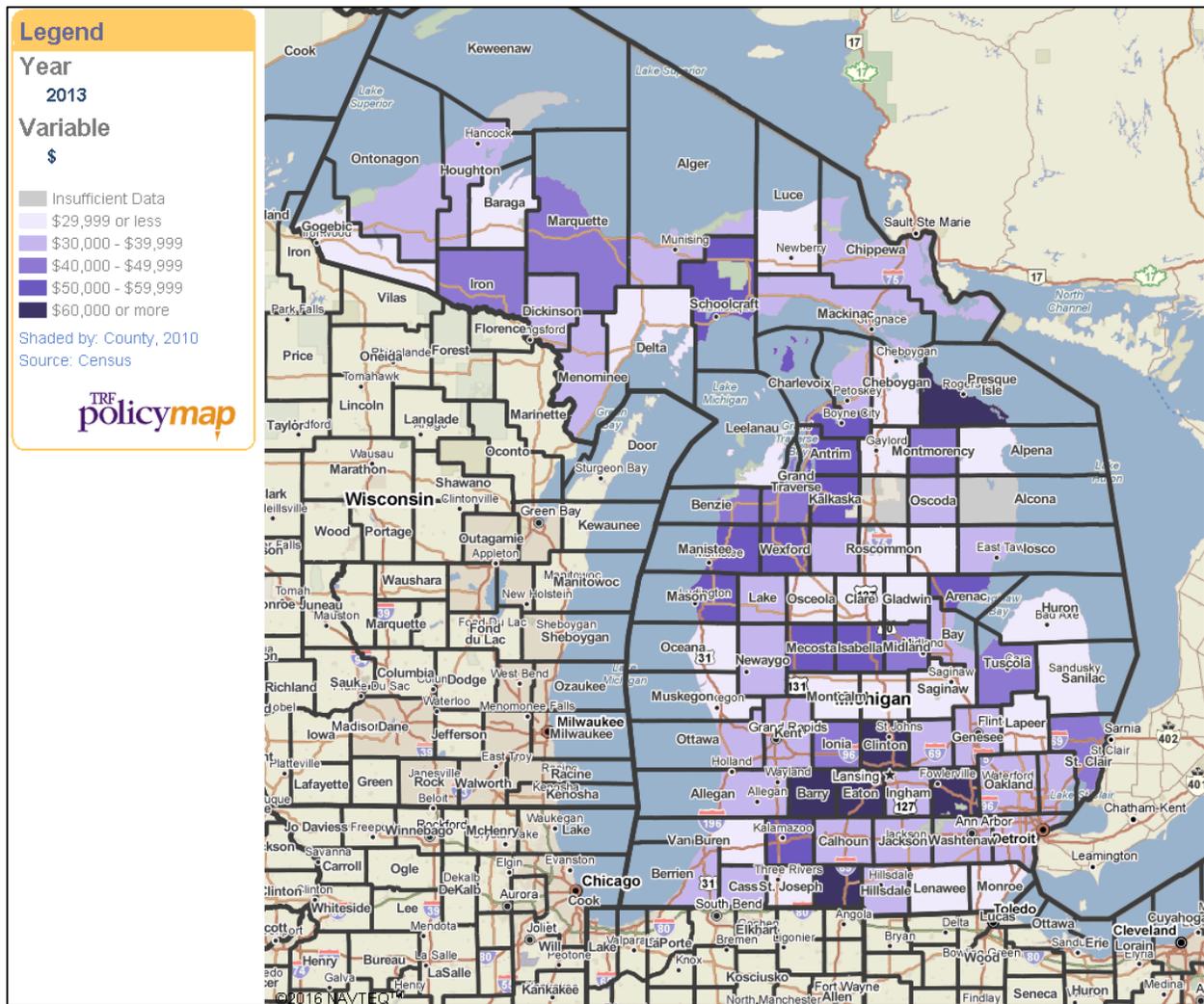
While the median household income for Black or African American households in Michigan was \$29,628, the range of MHI for the race group throughout the state varied widely (2014 ACS). There are pockets of higher MHI (\$60,000 or above) scattered throughout the state – including Marquette County in the Upper Peninsula, Cheboygan and Iosco counties in the north, Mason and Montcalm counties in Central Michigan, and Livingston County in Southeast Michigan. The lighter shaded areas have a lower MHI, and the darker areas have a higher MHI.

MAP: Median Household Income – Asian



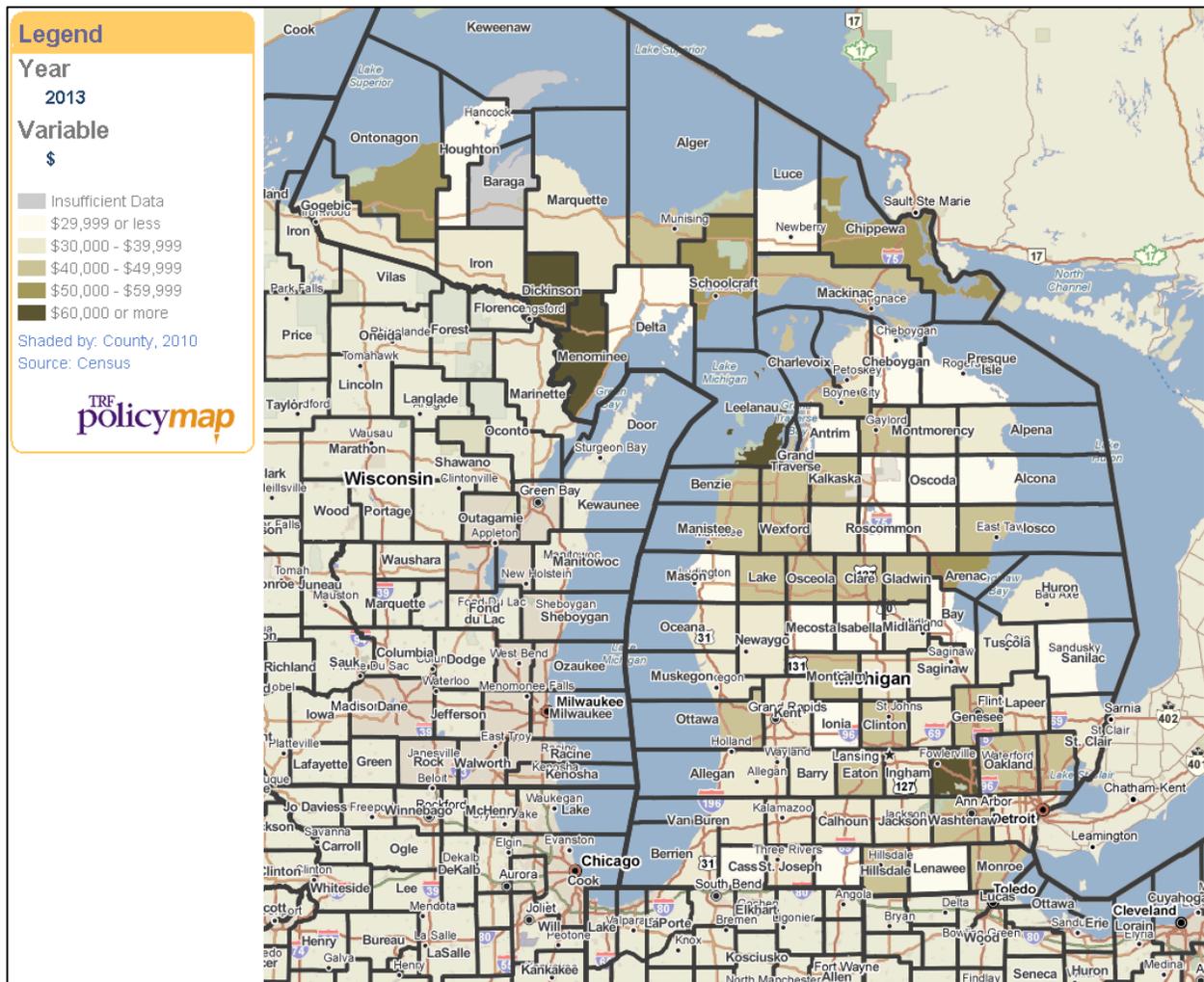
Asian households earned significantly higher than the state median at \$73,809, however the range of MHI for the ethnic group throughout the state varied widely (2014 ACS). The lighter shaded areas have a lower MHI, and the darker areas have a higher MHI. Note that a substantial number of counties have insufficient data (i.e. an inadequate number of Asian households to provide statistically valid results).

MAP: Median Household Income – American Indian and Alaskan Native



While the median household income for American Indian and Alaskan Natives in Michigan was \$37,217, the range of MHI for the ethnic group throughout the state varied widely (2014 ACS). The highest MHIs for American Indian and Alaskan Native households were in Presque Isles County in the northern Lower Peninsula and Livingston, Clinton, Barry, Eaton and Branch counties in South Michigan. The lighter shaded areas have a lower MHI, and the darker areas have a higher MHI.

MAP: Median Household Income – Hispanic or Latino



While the median household income for Hispanic or Latino households in Michigan was \$38,757, the range of MHI for the ethnic group throughout the state varied widely (2014 ACS). The highest MHIs for Hispanic or Latino households were in Dickinson and Menominee counties in the Upper Peninsula. The lighter shaded areas have a lower MHI, and the darker areas have a higher MHI. It is worth noting that the counties with the highest median incomes among Hispanic households are also among the counties with the lower percentage of Hispanic households, so while these counties may have relatively high Hispanic median incomes, they do not represent very many Hispanic households.

Poverty

Poverty is linked closely to unemployment and housing instability. When a person is unable to find suitable employment, their chances of living in poverty are much greater than those who have gainful employment. Living in poverty can have devastating health effects on individuals and families, because without financial stability it is difficult to have the time or resources to take care of health problems before they become emergencies. Research by Gallup found that living in poverty increased the risk of depression, asthma, obesity, diabetes, high blood pressure, and heart attacks.⁹ Poverty has a devastating effect on the children, as well as adults. Research conducted in Canada and published in the “Pediatrics & Child Health Journal” found a significant link between poverty and increased infant mortality, childhood obesity, injuries, and mental health issues (which include high levels of aggression, emotional disorders and anxiety, and hyperactivity, as well as physical aggression towards peers and authority figures.)¹⁰ These health issues can have a large economic impact on the community due to the inability to pay by families in poverty. Health issues are often ignored until they become devastating, which increases the cost of treatment.

Given the considerable consequences of poverty on the family and the community, it is important for Michigan to address these issues. According to 2010-2014 American Community Survey figures, the poverty rate for all individuals in Michigan was 16.9 percent. This was slightly higher than the national rate of 15.6 percent and the highest in the region. From 2000 to 2014 the poverty rate in Michigan increased 61 percent, but during the same time period the national poverty rate grew only 26 percent. The only state in the area that saw a larger increase in poverty was Indiana with 63.2 percent.

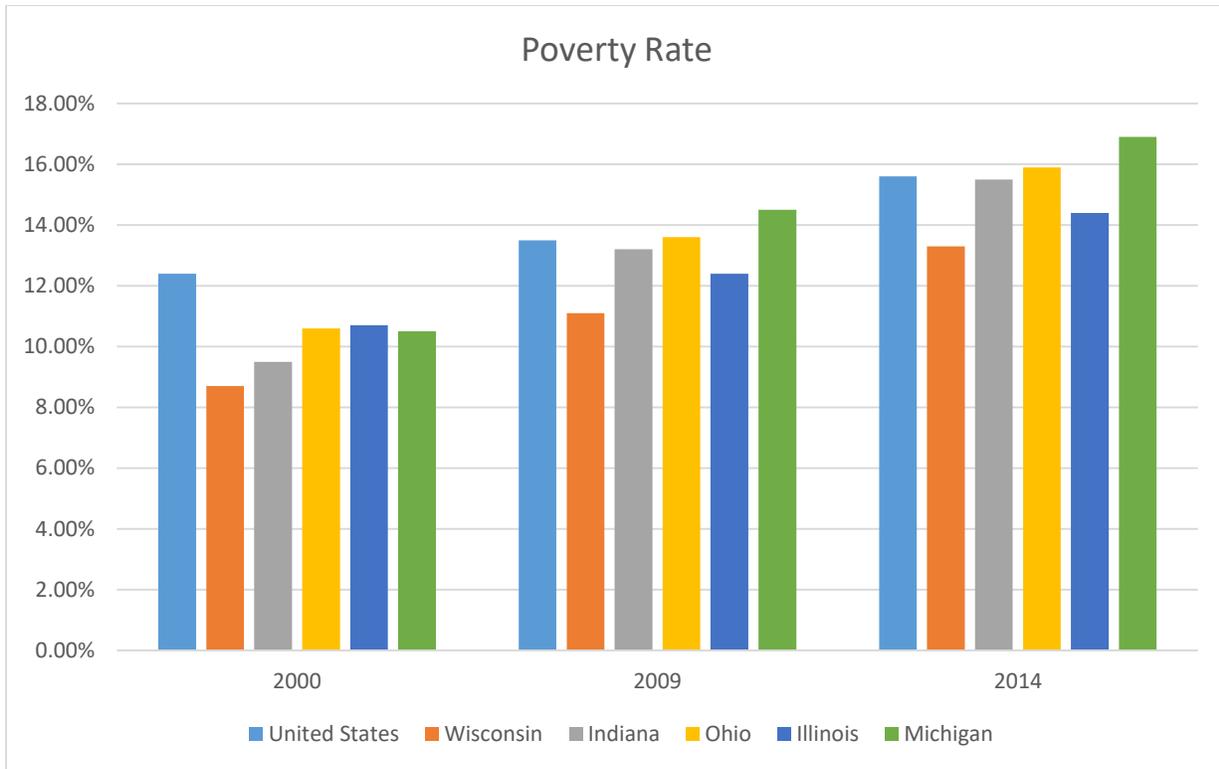
TABLE: Poverty Rate - 2000 to 2014				
	2000	2009	2014	% Change 2000-2014
United States	12.4%	13.5%	15.6%	25.8%
Wisconsin	8.7%	11.1%	13.3%	52.9%
Indiana	9.5%	13.2%	15.5%	63.2%
Ohio	10.6%	13.6%	15.9%	50.0%
Illinois	10.7%	12.4%	14.4%	31.8%
Michigan	10.5%	14.5%	16.9%	61.0%

Source: 2000 Census DP-3, 2005-2009 ACS 5-Yr Estimates S1703, 2010-2014 ACS 5-Yr Estimates S1701

⁹ <http://www.gallup.com/poll/158417/poverty-comes-depression-illness.aspx>

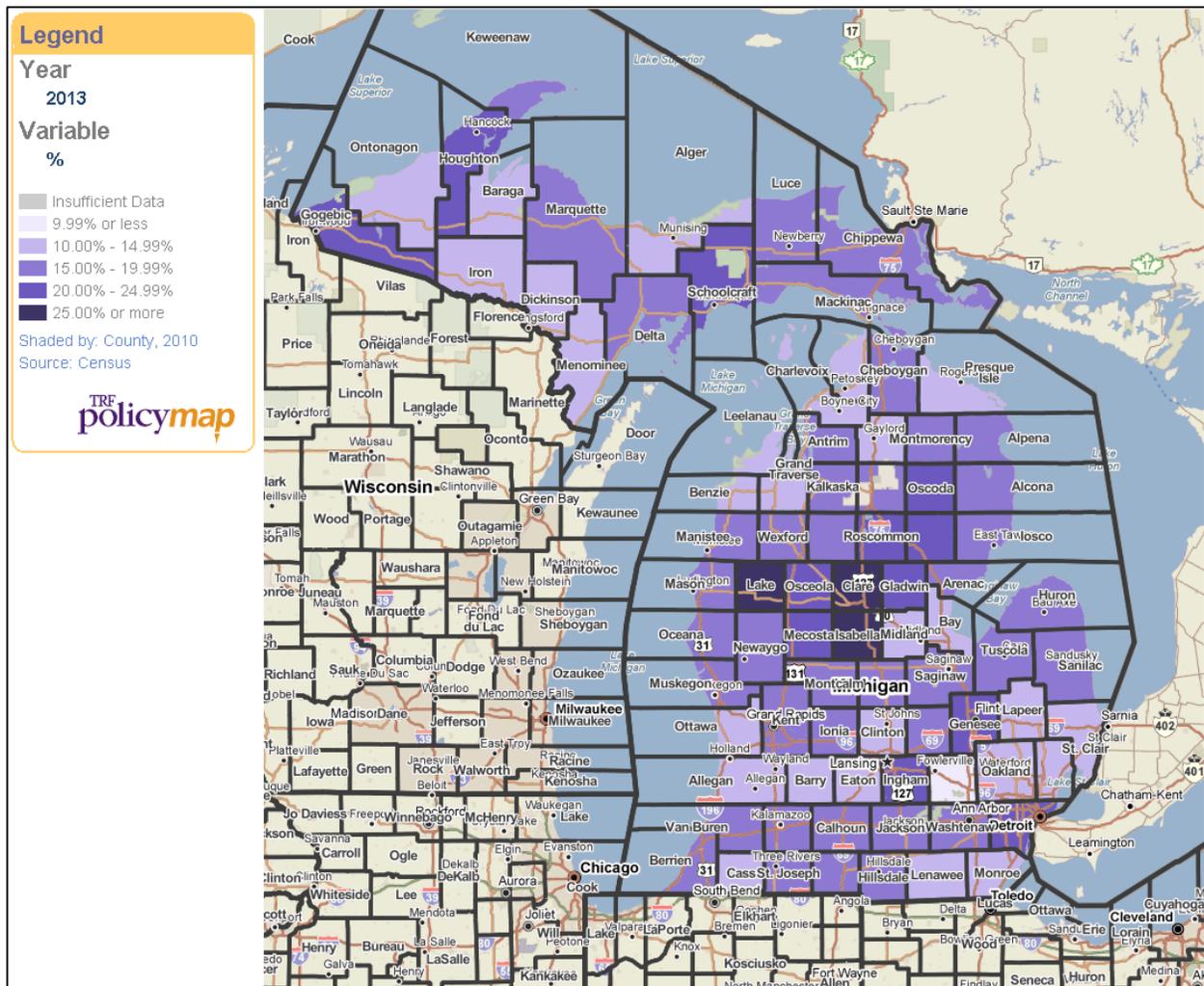
¹⁰ <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC2528796/>

The chart below displays the information from the previous table. In it you can see that Michigan, which was similar to the rest of the region and had a poverty rate lower than the country in 2000, has seen the poverty rate increase substantially and become higher in 2014 than the other states in the region or the nation as a whole.



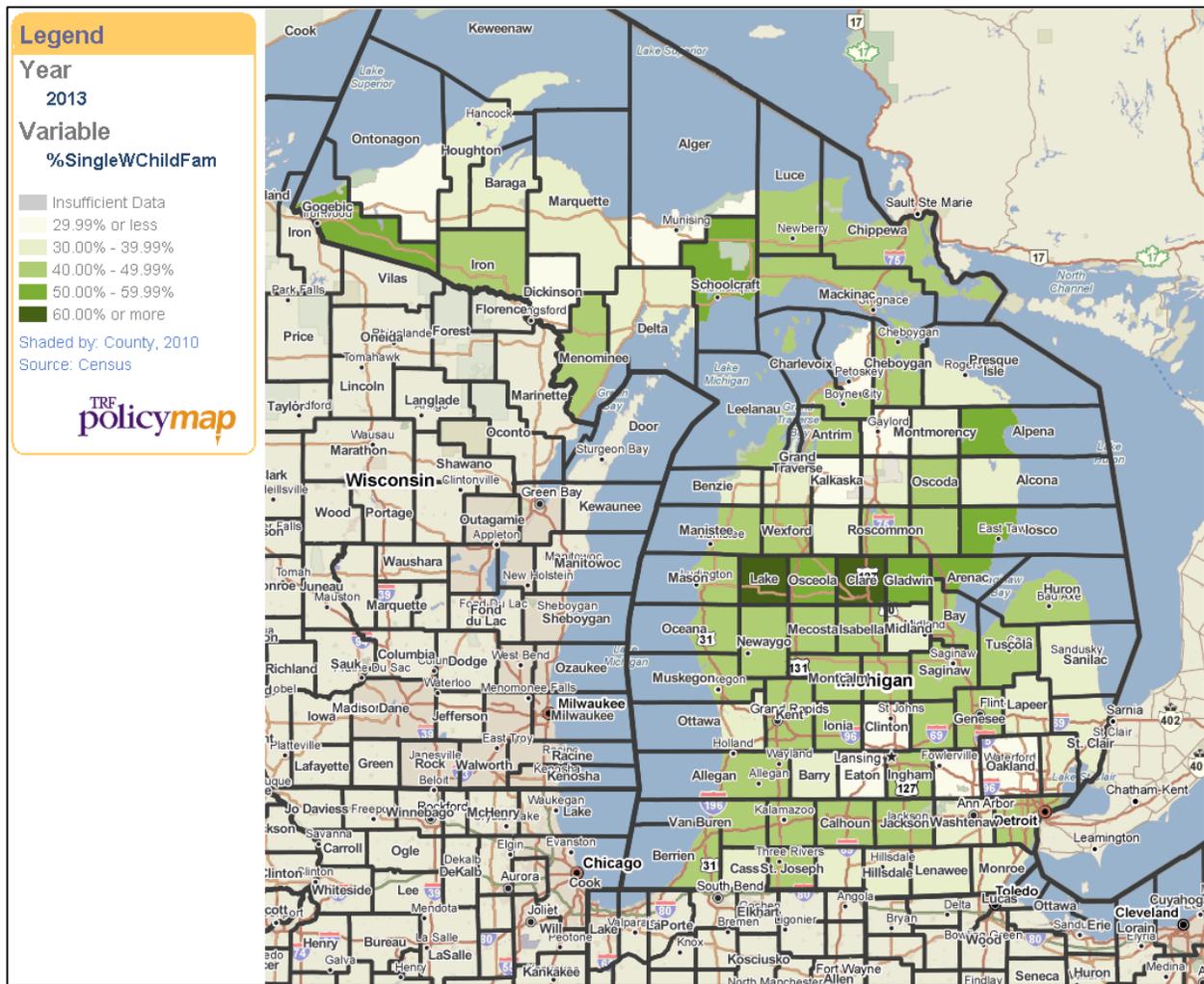
Source: 2000 Census DP-3, 2005-2009 ACS 5-Yr Estimates S1703, 2010-2014 ACS 5-Yr Estimates S1701

MAP: People in Poverty



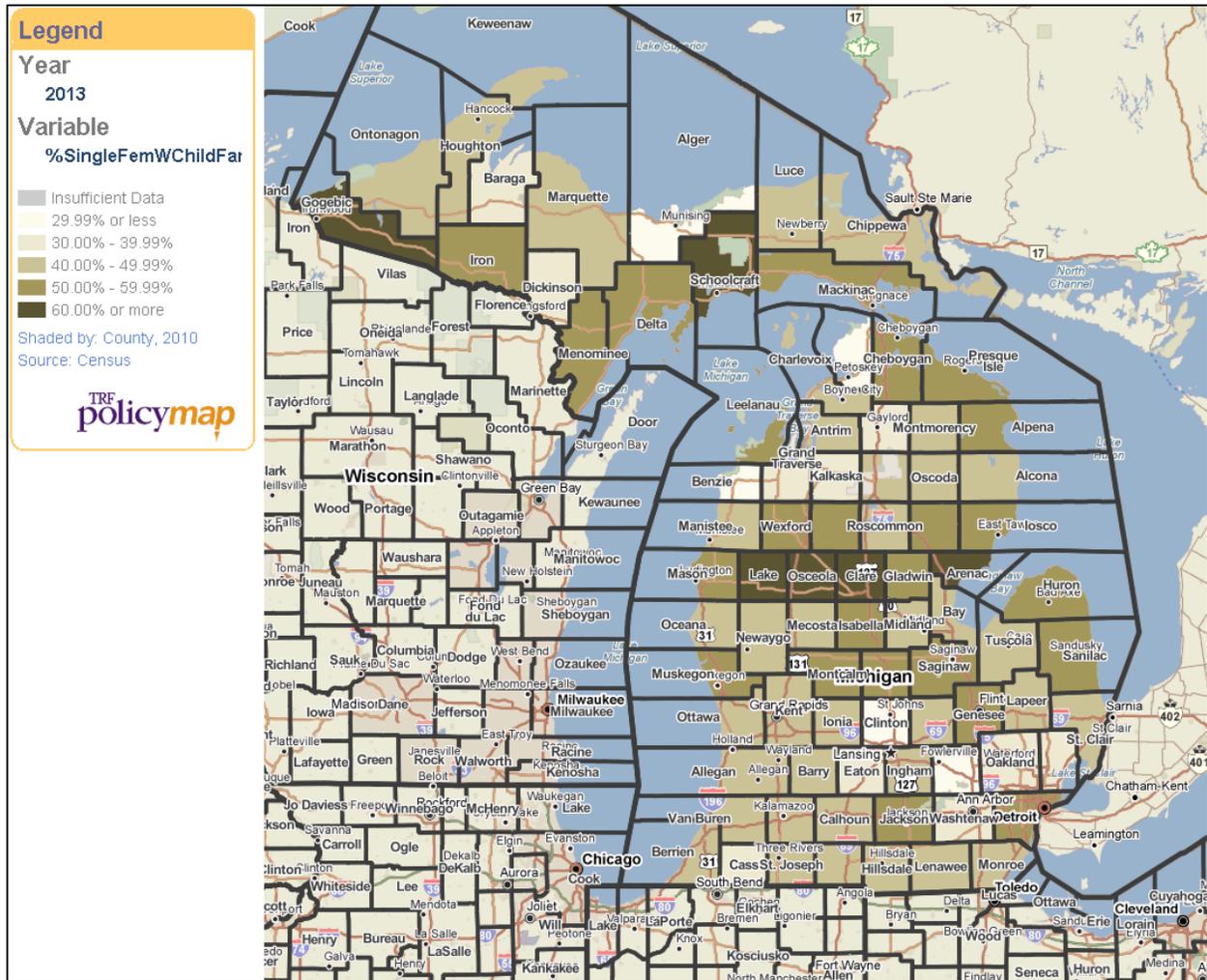
Although the statewide poverty rate in Michigan was 16.9 percent, poverty was not evenly distributed throughout the state (2014 ACS). Lake, Clare, and Isabella counties in the center of the state experienced a higher poverty rate than the rest of the state at over 25 percent. The lighter shaded areas have a lower poverty rate, and the darker areas have a higher poverty rate.

MAP: Single Parent Families with Children in Poverty



Single parent families had a much higher rate of poverty than families with two parents. It is more difficult for a single parent to provide the resources necessary to escape poverty. Within this subset some counties experienced poverty at significantly higher rates than others. Lake County and Clare County had a poverty rate of over 60 percent for single headed families with children. The lighter shaded areas have a lower poverty rate, and the darker areas have a higher poverty rate.

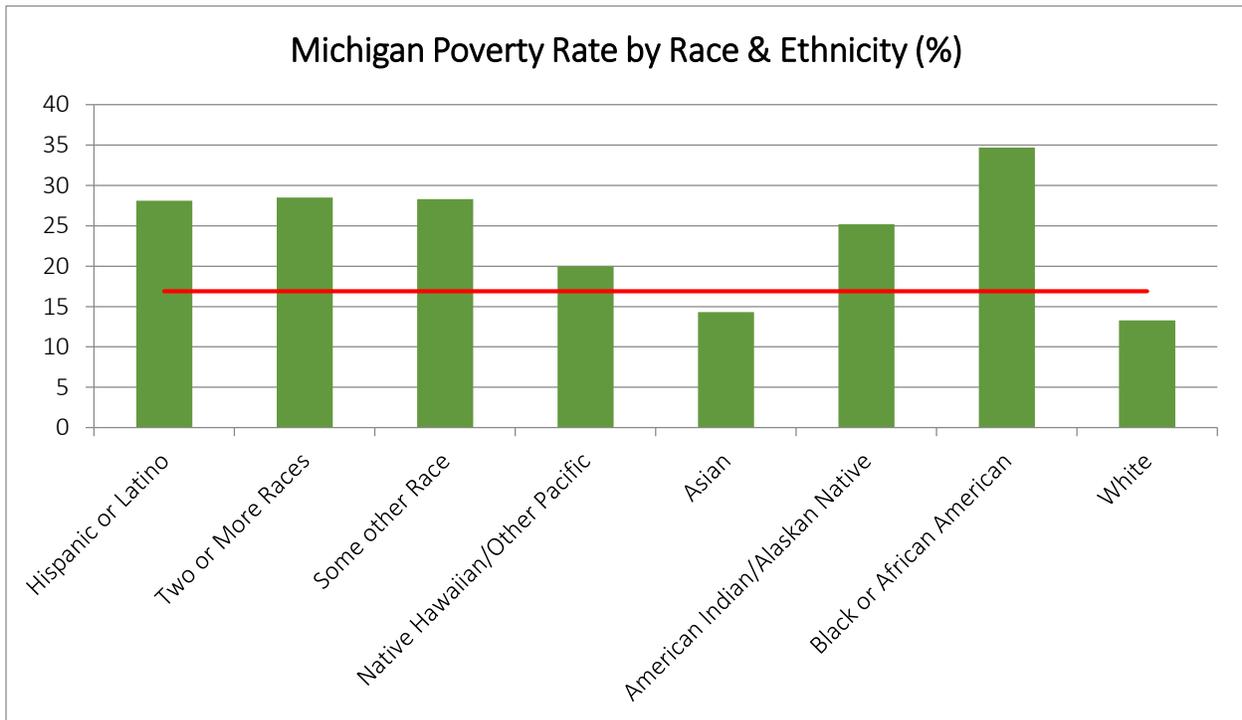
MAP: Single Female Headed Families with Children in Poverty



When the single parent is female, the level of poverty increases. The concentration of single female-headed families with children in poverty is higher in some northern Lower Peninsula and Upper Peninsula counties than other areas of the state. Like the previous two maps looking at poverty, there is also a high poverty level among single female-headed families with children in the central Michigan counties of Lake, Osceola, Clare, and Arenac. The lighter shaded areas have a lower poverty rate, and the darker areas have a higher poverty rate.

Poverty and Race

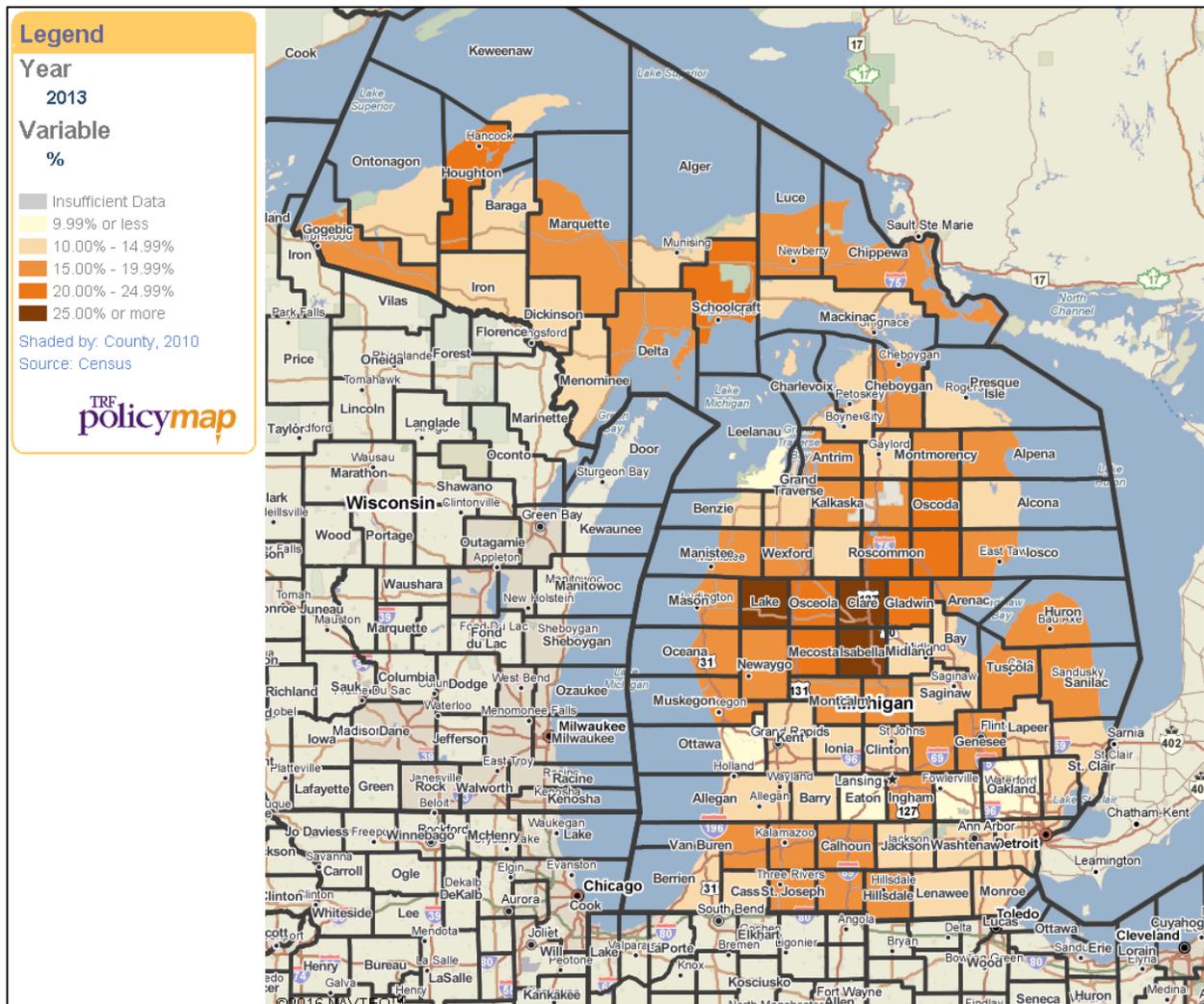
While the 2014 statewide poverty rate (all people) was 16.9 percent, there was a significant disparity among differing racial and ethnic groups. Whites (13.3%) and Asians (14.3%) had a lower poverty rate than the statewide rate. In contrast, 34.7 percent of Black and African American households were below the poverty level – more than double the state rate – and approximately 28.1 percent of Hispanic or Latino households experienced poverty. All other races and ethnicities experienced poverty rates higher than the statewide rate. The following chart visually compares the 2014 poverty rate by households of differing racial and ethnic groups.



Data Source: 2010-2014 American Community Survey 5-Yr Estimates (S1701)

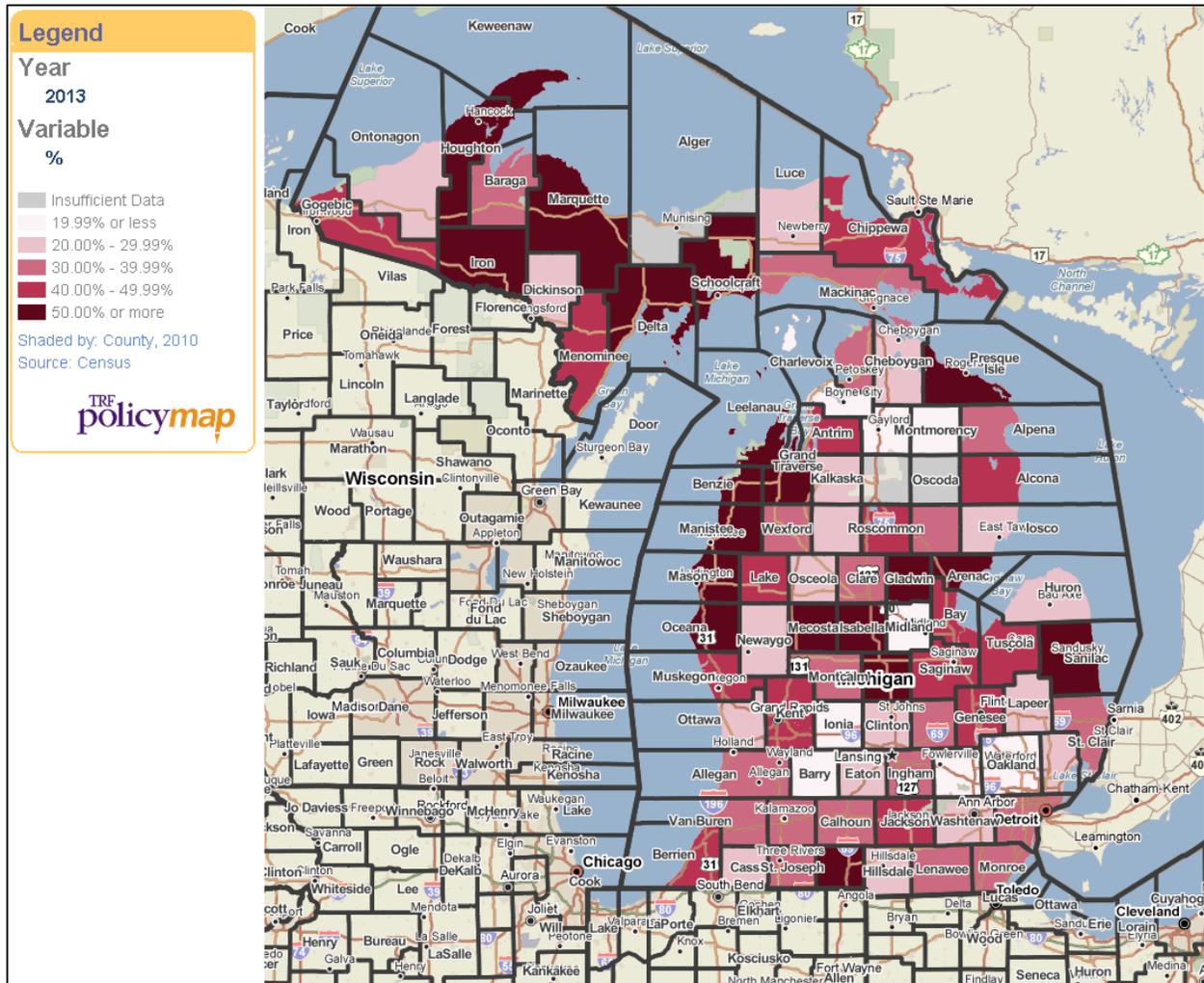
Data Note: The red line represents the statewide poverty rate of 16.9 percent.

MAP: Poverty Rate – White



While the statewide poverty rate for White persons was 13.3 percent, the poverty rate for the race group varied widely throughout the state. Lake County, Clare County and Isabella County experienced the highest poverty rates in the state. The lighter shaded areas have a lower poverty rate, and the darker areas have a higher poverty rate.

MAP: Poverty Rate – Black or African American

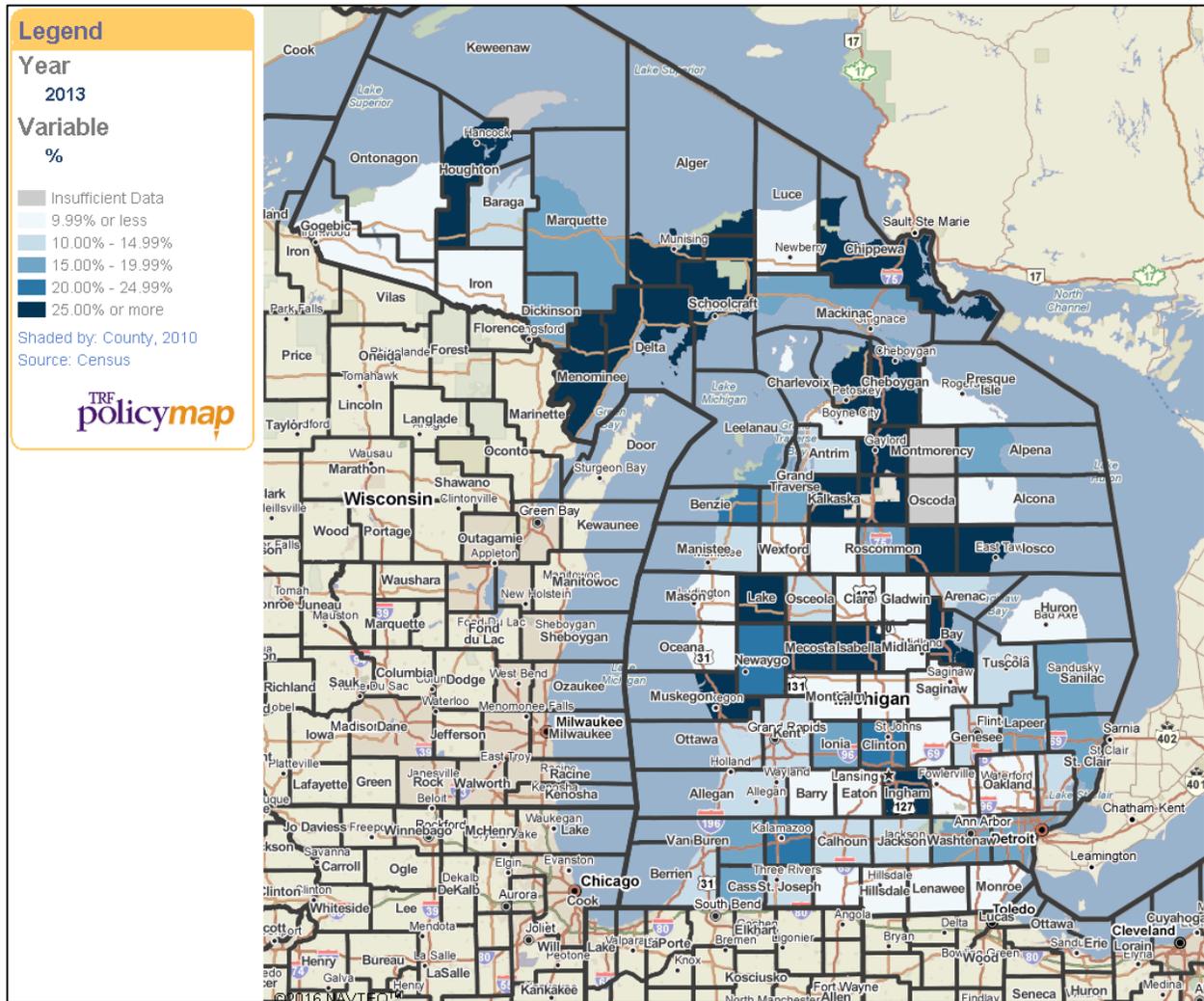


While the statewide poverty rate for Black or African American persons was 34.7 percent, the poverty rate for the race group varied widely throughout the state. The lighter shaded areas have a lower poverty rate, and the darker areas have a higher poverty rate. There are pockets scattered across the state where the poverty rate for Blacks or African Americans is over 50 percent, with a particularly heavy concentration in the Upper Peninsula.

When looking at this data there are two counties that warrant further analysis. Marquette and Mason county both have high levels of African-American individuals living in poverty, 56.0% and 50.3%, respectively. Yet, these two counties also have an incredibly high Median Household Income for African-American Families. Marquette County has an African-American MHI of \$62,708 and Mason County has an African-American MHI of \$70,625. One major cause of this discrepancy is the incredibly small African-American population in both of these counties. In Marquette County, there are only 277 individuals who identify as Black or African-American, that is only 0.44%. Mason County is similar with only 160 individuals who identify as Black or African-American, which makes up only 0.57%. When population figures are this small it only takes a few individuals to skew the data. For example, both Mason and Marquette County

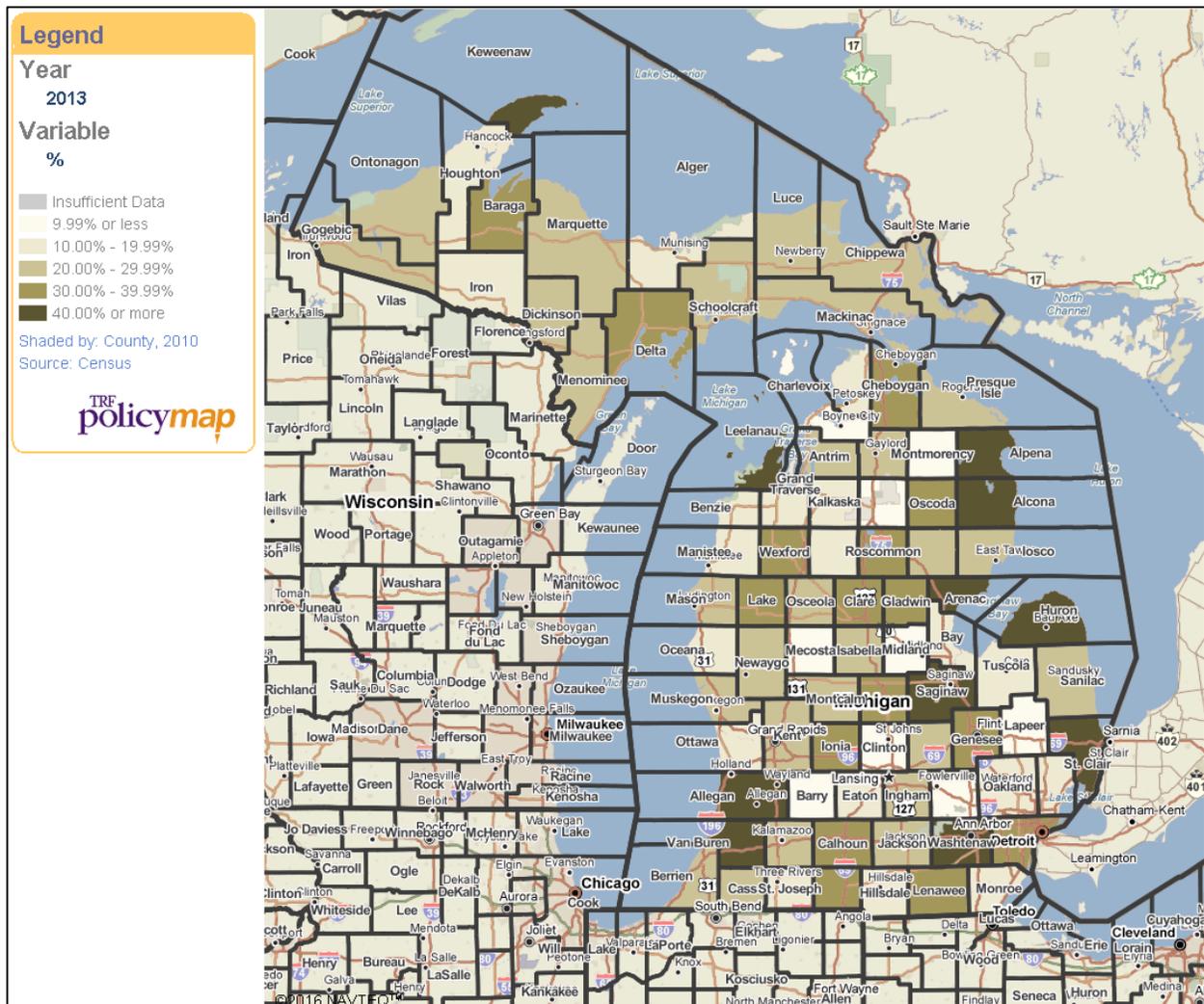
have highly lucrative mining, quarrying, and oil and gas extraction industries that have a median earnings of over \$80,000, which is 3-4 times the median earnings in each county for the population as a whole. Additionally, both counties host Coast Guard facilities which, given the diversity within the federal work force and strong salaries, may be the source of this statistical paradox.

MAP: Poverty Rate – Asian



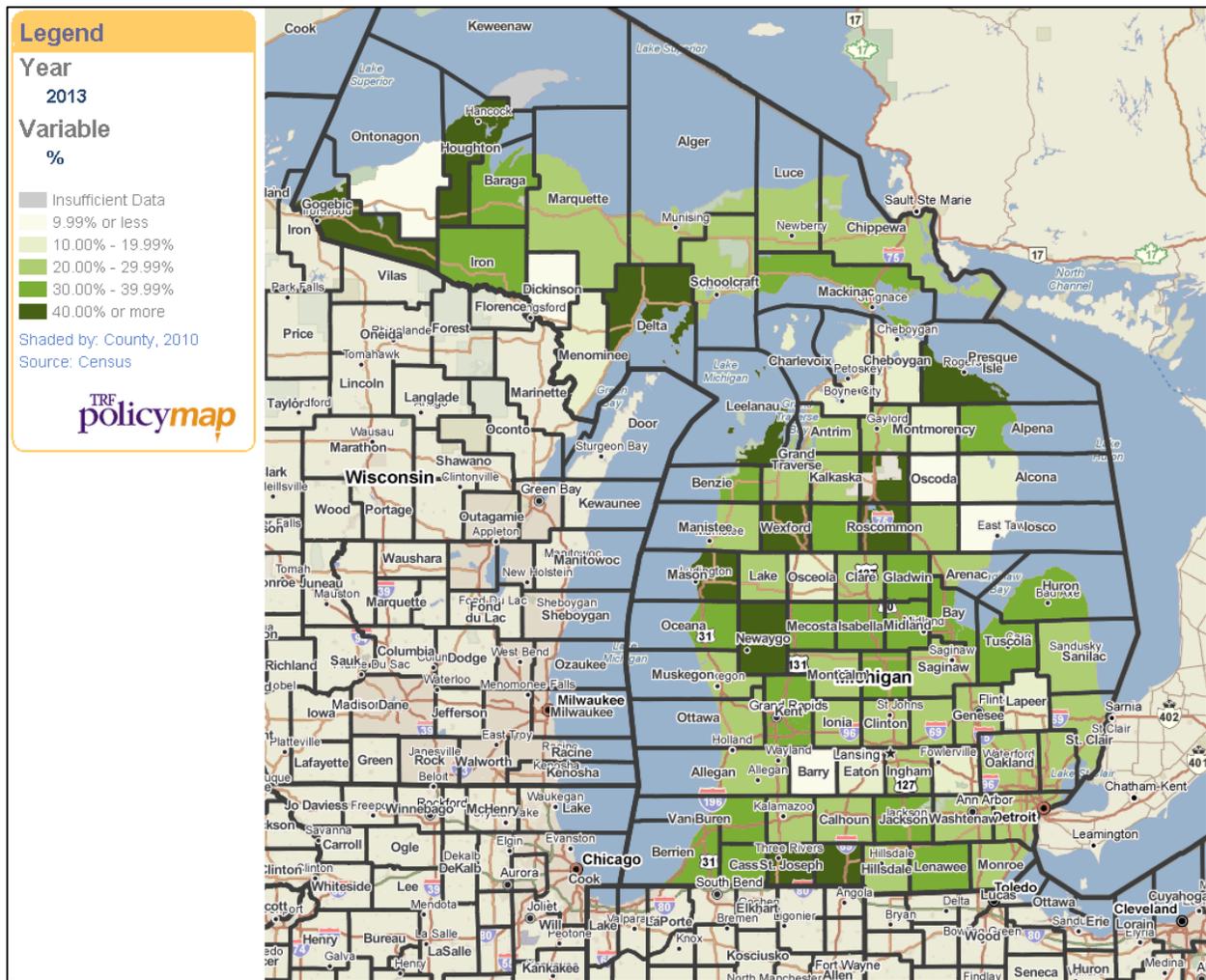
While the statewide poverty rate for Asian persons was 14.3 percent, the poverty rate for the race group varied widely throughout the state with many areas experiencing over 25 percent poverty rate. The lighter shaded areas have a lower poverty rate, and the darker areas have a higher poverty rate.

MAP: Poverty Rate – American Indian and Alaskan Native



While the statewide poverty rate for American Indian and Alaskan Native persons was 25.2 percent, the poverty rate for the race group varied widely throughout the state with many areas experiencing over 40 percent poverty rate. The lighter shaded areas have a lower poverty rate, and the darker areas have a higher poverty rate.

MAP: Poverty Rate – Hispanic or Latino



While the statewide poverty rate for Hispanic or Latino persons was 28.1 percent, the poverty rate for the race group varied widely throughout the state with many areas experiencing over 40 percent poverty rate. The lighter shaded areas have a lower poverty rate, and the darker areas have a higher poverty rate.

Unemployment

Unemployment can have devastating effects on both the individual members and the overall economy of a community. When a person is out of work, it forces them to reduce spending, deplete their savings (if any exist), and often use public resources to cover housing and living expenses. This additional use of public resources, if extended, can put a drain on an already struggling tax base, which could require either raising taxes or reducing services elsewhere to compensate. If unemployment persists for extended periods of time it can have cascading negative effects.

For example, at the individual level unemployment can be the first in a string of unfortunate dominos that end in homelessness. Lack of income can quickly lead to foreclosure. The longer someone is unemployed the more difficult it is for them to find a job, even as the economy recovers. Long periods of unemployment have also been linked to an increased rate of depression, substance abuse, household turmoil, and a heightened risk of suicide¹¹. These health issues can prevent an individual from finding work when it is available and strain the limited resources available provided by a social safety net. Over time this situation results in homelessness for many – especially those with other risk factors such as lack of savings, substance abuse problems, lack of a family support network, etc. Due to the interrelated nature of these variables, the path between unemployment and homelessness can be surprisingly direct.

On the community level, extended unemployment can lead to population decline as people migrate away looking for economic opportunities elsewhere. This situation has the potential for vicious feedback loops to materialize: a shrinking population means a shrinking tax base which can result in reduced public services, decreased infrastructure investment, and a lower quality of life across the board. This in turn makes it even more difficult to attract the new business investment needed to combat the underlying unemployment problem.

Michigan was hit particularly hard by the economic recession of the early 21st Century. In 2000, Michigan's unemployment rate was similar to that of the other states in the region and the country as a whole. Recovery has been slow everywhere, but Michigan lags behind the region. According to 2010-2014 American Community Survey figures, the unemployment rate for all individuals in Michigan was 11.4 percent.¹² This was more than two percent higher than the national rate of 9.2 percent and several percentage points higher than most other states in the region. From 2000 to 2014 the unemployment rate in Michigan increased 226.5 percent; during the same time period the national unemployment rate grew 148.6 percent.

¹¹ Suicide Prevention Resource Center,

http://www.sprc.org/sites/default/files/migrate/library/Economy_Unemployment_and_Suicide_2008.pdf

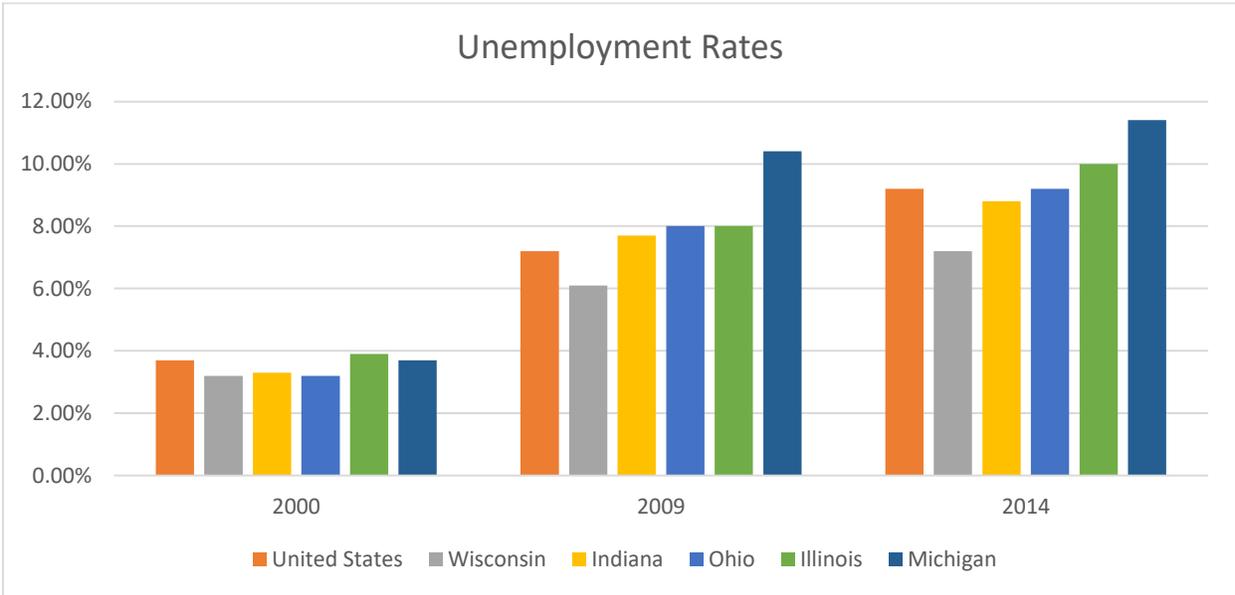
¹² The Unemployment Rate as determined by the ACS varies significantly from the one determined by the Bureau of Labor and Statistics (BLS). ACS data was utilized in this report to keep source consistency throughout the document. This is due to significant differences in data collection, residency rules, the wording of questions, etc. A complete explanation of the differences between these two sources can be found at the US Census website:

https://www.census.gov/people/laborforce/publications/ACS-CPS_Comparison_Report.pdf

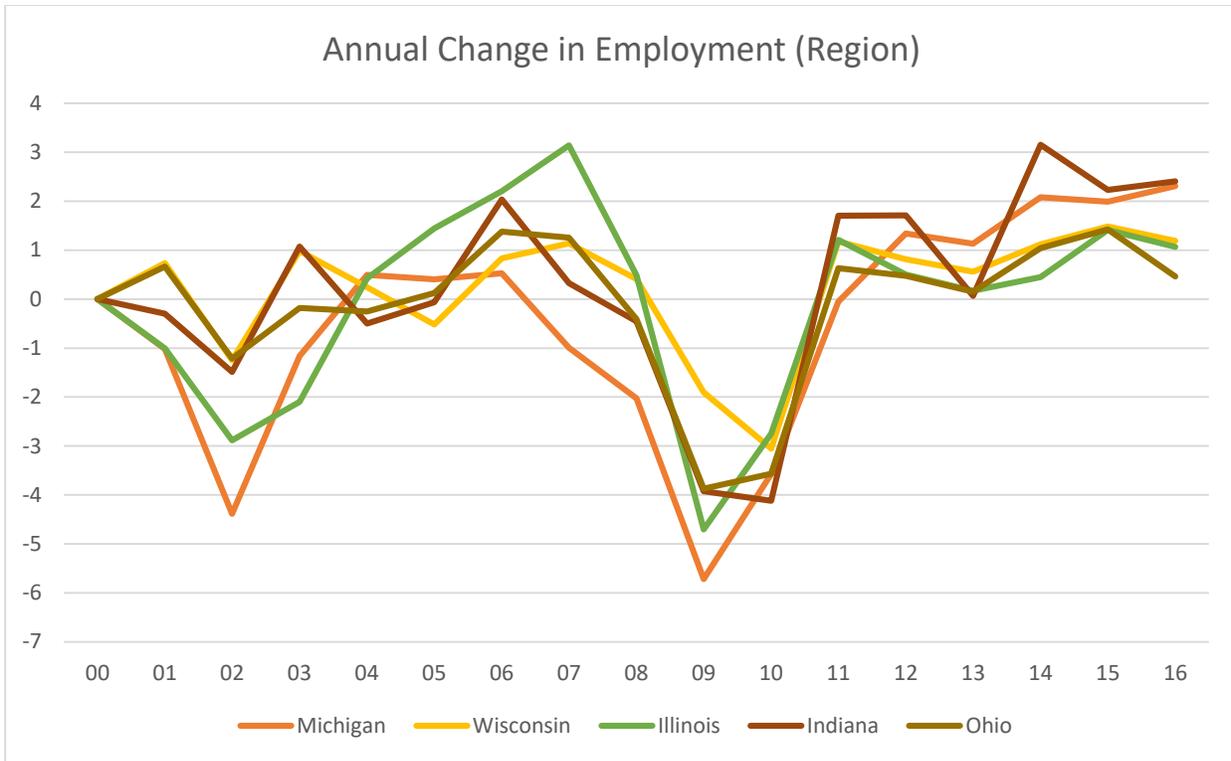
TABLE: Unemployment - 2000 to 2014				
	2000	2009	2014	% Change 2000-2014
United States	3.7%	7.2%	9.2%	148.6%
Wisconsin	3.2%	6.1%	7.2%	125%
Indiana	3.3%	7.7%	8.8%	166.7%
Ohio	3.2%	8.0%	9.2%	187.5%
Illinois	3.9%	8.0%	10.0%	101.6%
Michigan	3.7%	10.4%	11.4%	226.5%

Source: 2000 Census, 2005-2009 ACS 5-Yr Estimates, 2010-2014 ACS 5-Yr Estimates (DP03)

The next two charts visualize employment data over time. The first chart displays the information from the table above. Michigan stands out as an outlier with relatively high unemployment in the region. The second chart shows change in employment between years. This data comes from the Bureau of Labor and Statistics (BLS), and again Michigan has the sharpest decline in employment during the early 2000s recession, as well as the recession in 2006.



Data Source: 2010-2014 American Community Survey 5-Yr Estimates (DP03)

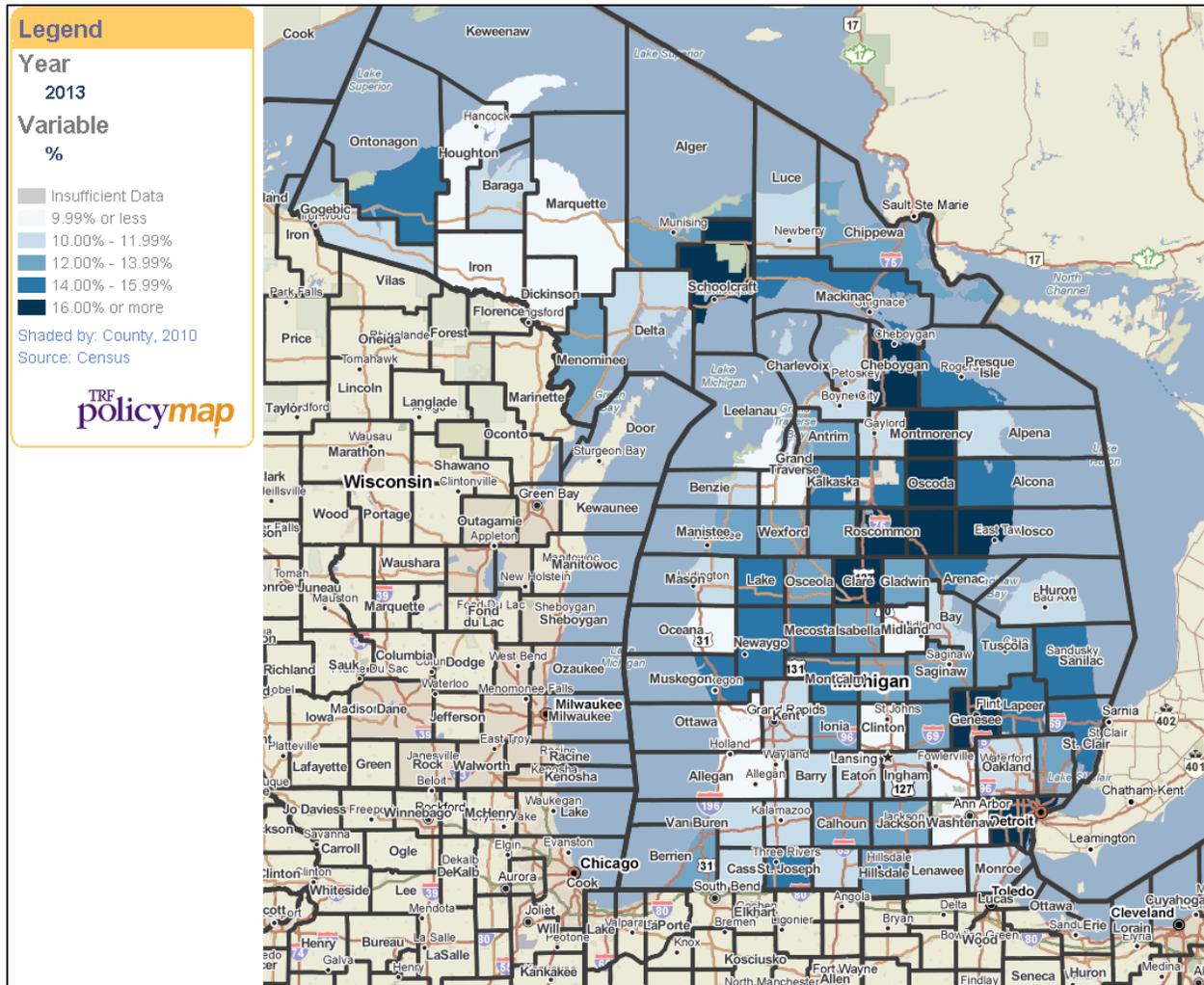


In 2000, 4,976,000 people were employed in Michigan, but when the recession hit the employment numbers declined every year until beginning a slow recovery in 2011. In 2010, the lowest point since 2000, Michigan had 4,194,000 employed (a loss of 782,000 jobs). By 2014 over 200,000 more people are employed but that is still significantly less than 2000.

Year	Employed (mil)
2000	4.976
2001	4.855
2002	4.702
2003	4.667
2004	4.706
2005	4.739
2006	4.721
2007	4.659
2008	4.529
2009	4.234
2010	4.194
2011	4.198
2012	4.244
2013	4.306
2014	4.402

Source: Michigan Department of Technology, Management, and Budget

MAP: Unemployment



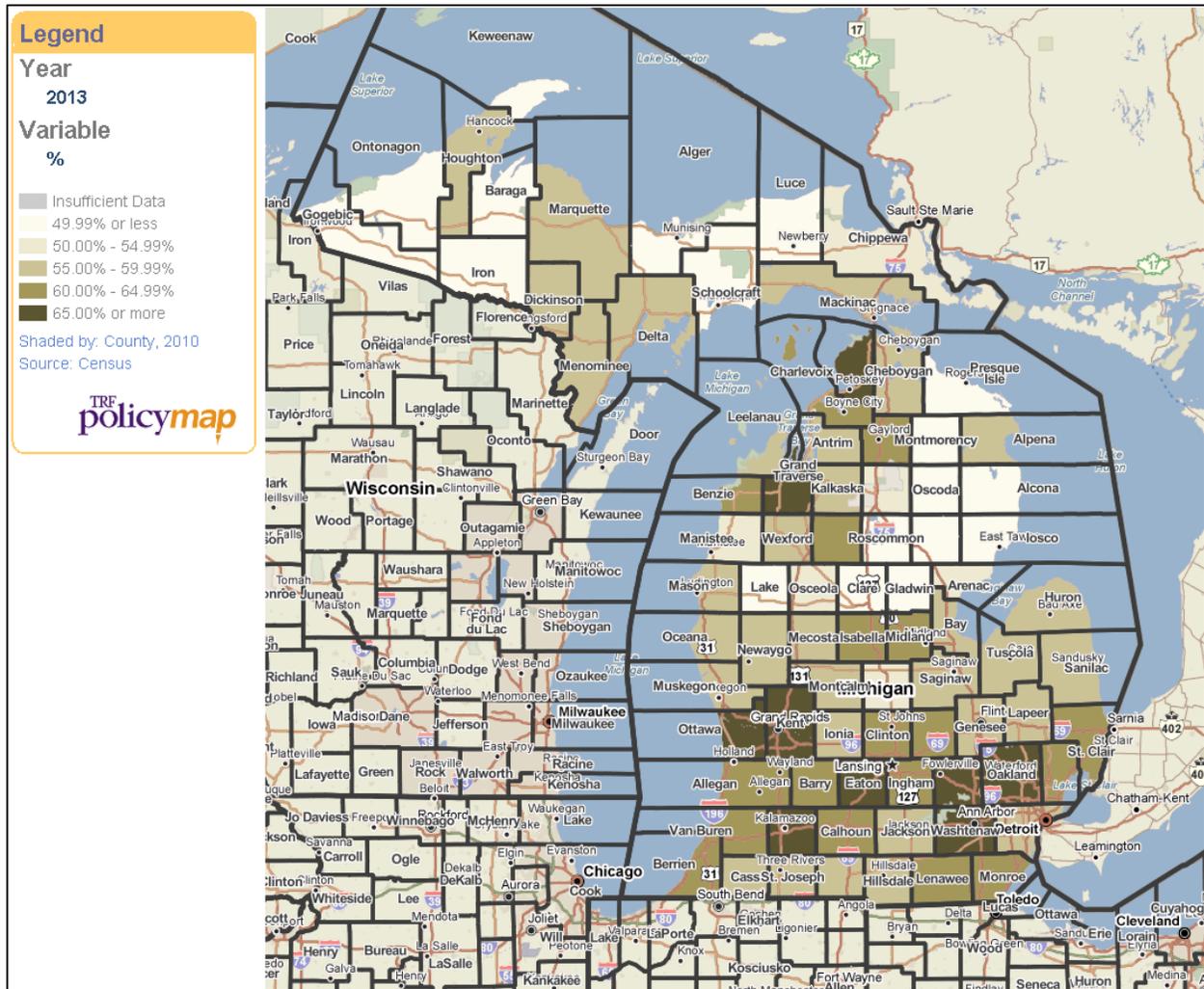
The statewide unemployment rate was 11.4 percent, but unemployment varied throughout the state (2014 ACS). The lighter shaded areas have a lower unemployment rate, and the darker areas have a higher rate. Unemployment is higher in the northern Michigan than in the rest of the state – particularly in Cheboygan, Montmorency, Oscoda, Roscommon, Isosco, Schoolcraft, Wayne, and Clare counties.

When we break unemployment rates into regions we see that some areas have greater rates of unemployment than others. The following table looks at the unemployment rate in Michigan by region. This helps paint a clearer picture of which areas are dealing with the highest rates of unemployment. Region 3, in the northeast corner of the Lower Peninsula, has the highest overall rate in the state with 13.8 percent. The lowest unemployment rate is Region 7 in the lower central with 9.4 percent, but Region 2 (9.7%) and Region 9 (9.8%) are close.

Region	Unemployment Rate
Region 1	10.3%
Region 2	9.7%
Region 3	13.8%
Region 4	10.5%
Region 5	11.5%
Region 6	12.2%
Region 7	9.4%
Region 8	10.5%
Region 9	9.8%

Source: American Community Survey 5-Year Estimates 2009-2014, S2301

MAP: Labor Force



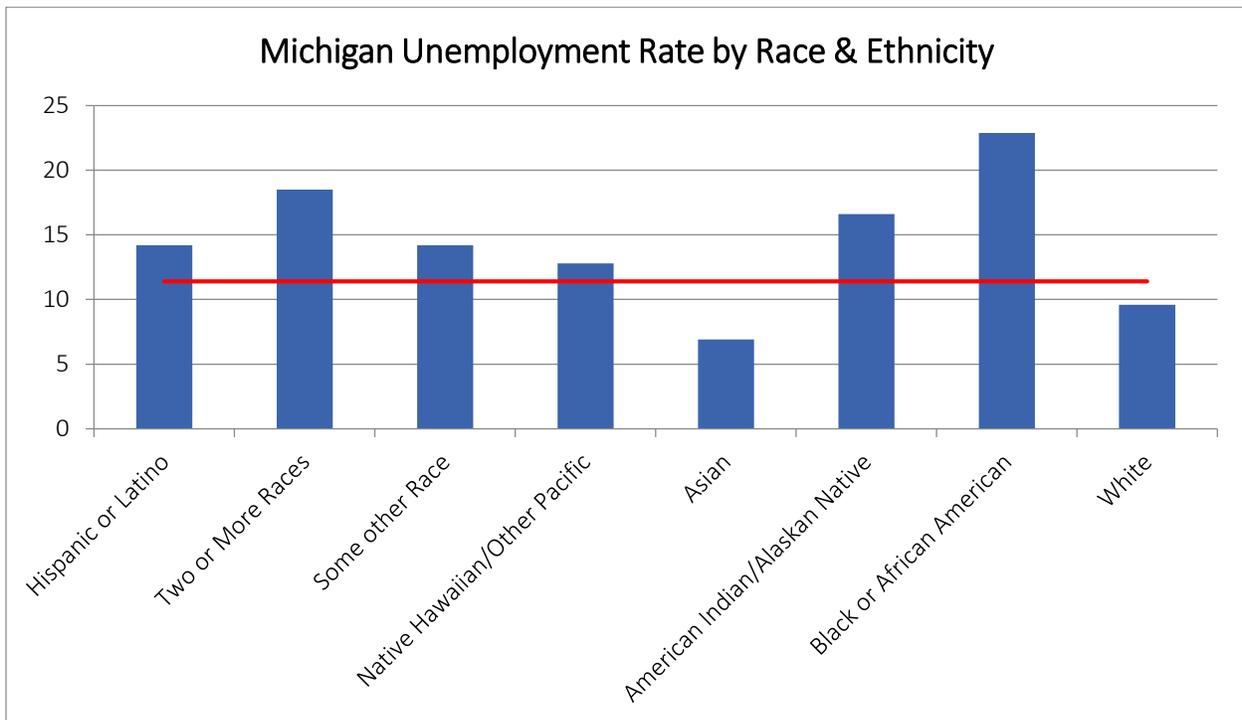
The map above shows labor force participation of the population. To a partial degree, it is the opposite side of unemployment and, unsurprisingly, areas with high unemployment have low labor participation. While there are some areas in northern Michigan that have a large percentage of the population in the labor force, there is a higher percentage of the population in the labor force in the southern areas of the state. The lighter shaded areas have a lower percent of the population in the labor force, and the darker shades have a higher percent.

The next table outlines the labor statistics in Michigan by Industry. The largest industry by far is Education and Health Care Services with 24.1 percent. The second largest job-producing industry is Manufacturing with 17.4 percent, followed by Retail Trade by at 11.4 percent. Many industries are within 1-2 percent of the national representation, though some key industries do stand out. Michigan has a significantly larger Manufacturing sector, while the state has smaller sectors in Construction and Professional, scientific, management, administrative. It should be noted that according to the Bureau of Labor Statistics, the fastest growing sector in the United States is Education and Health Care Services – particularly jobs in Health Care Services – while over this period Manufacturing was the most rapidly declining sector.

TABLE: Business by Sector				
Industry	Number of Workers	Share of Workers	Number of Workers	Share of Workers
	United States		Michigan	
Agriculture, forestry, fishing and hunting, mining	2,807,292	2.0%	56,755	1.3%
Construction	8,843,718	6.2%	204,227	4.8%
Manufacturing	14,955,235	10.4%	746,413	17.4%
Wholesale trade	3,937,598	2.7%	105,437	2.5%
Retail trade	16,598,718	11.6%	491,344	11.4%
Transportation and warehousing, and utilities	7,066,666	4.9%	176,791	4.1%
Information	3,064,078	2.1%	68,697	1.6%
Finance and insurance, real estate, rental, leasing	9,467,555	6.6%	236,416	5.5%
Professional, scientific, management, administrative	15,618,627	10.9%	398,271	9.3%
Educational services, health care, social assistance	33,297,237	23.2%	1,036,163	24.1%
Arts, entertainment, recreation, accommodation	13,610,162	9.5%	406,413	9.5%
Other services, except public administration	7,112,579	5.0%	206,631	4.8%
Public administration	7,055,768	4.9%	160,016	3.7%
Total	143,435,233	-	4,293,574	-
Source: 2010-2014 American Community Survey 5-Yr Estimates (DP03)				

Unemployment and Race

While the 2014 statewide unemployment rate was 11.4 percent, there was a significant disparity among differing racial and ethnic groups. Whites (9.6%) and Asians (6.9%) had unemployment rates below the statewide level. All other races and ethnicities had higher unemployment rates. Black and African American individuals had an unemployment rate of 22.9 percent – twice the statewide rate. Hispanics and Latinos also experienced a higher unemployment rate at 14.2 percent. The following chart visually compares the 2014 unemployment rate by differing racial and ethnic groups.



Data Source: 2010-2014 American Community Survey 5-Yr Estimates (S2301)

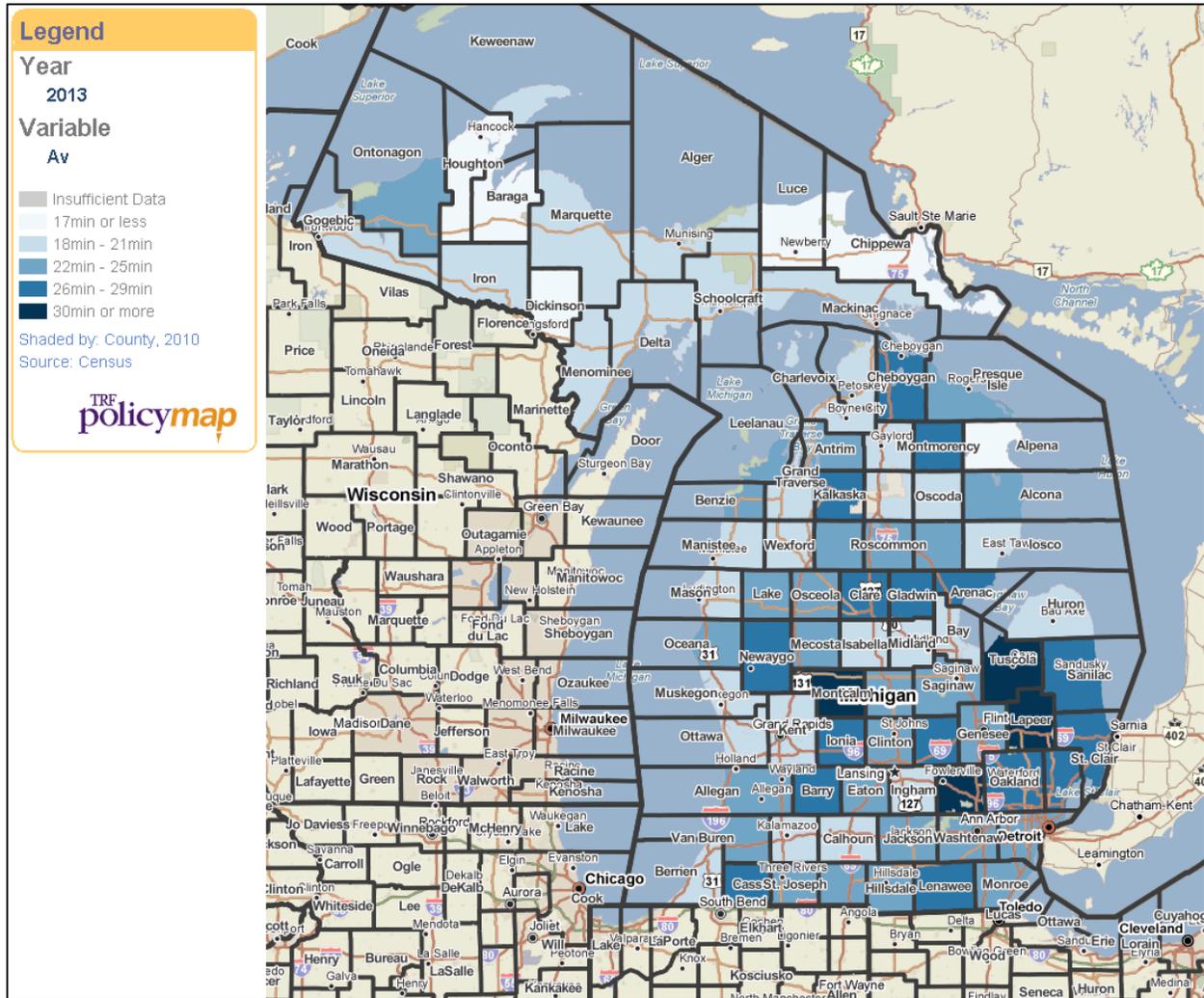
Data Note: The red line represents the statewide unemployment rate of 11.4 percent.

Transportation

According to 2010-2014 American Community Survey figures, the mean travel time to work in Michigan was 24.1 minutes. This was less than the national mean travel time of 25.7 minutes. In terms of how people get to work, driving a vehicle alone is by far the most popular form of transportation in the state with 82.7 percent of the labor force using personal vehicles. The national rate is of 76.4 percent. The second most common method for commuting is carpooling, with 8.9 percent. This is roughly consistent with the national rate of 9.6 percent. All other methods fall within one percent of the national averages except one where Michigan varies significantly from the national rates – Public Transportation. In Michigan, only 1.4 percent use this method compared to 5.1 percent of the nation as a whole.

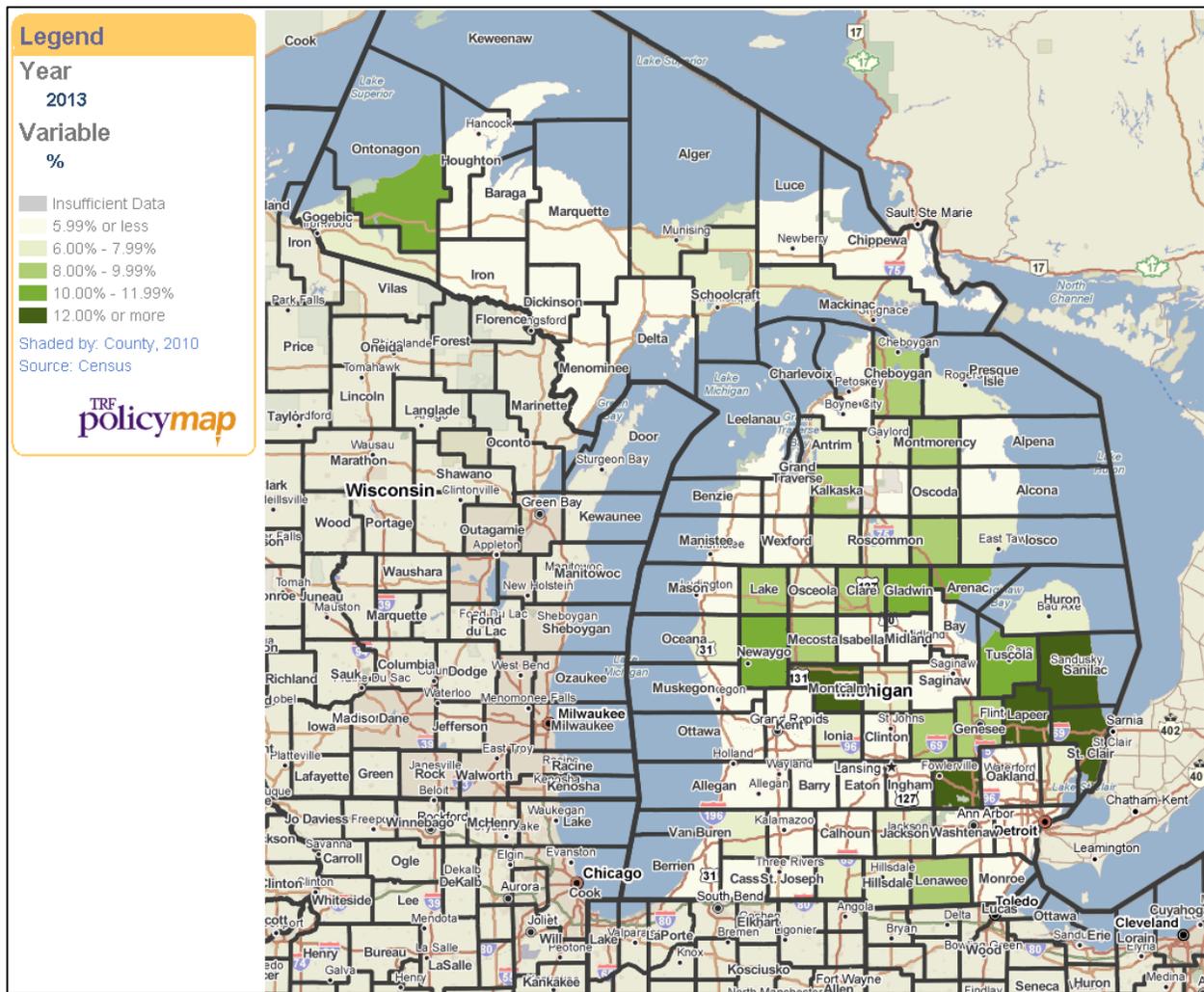
TABLE: Commuting to Work (Method)				
	United States	%	Michigan	%
Car, truck, or van -- drove alone	107,990,698	76.4%	3,472,512	82.7%
Car, truck, or van -- carpooled	13,554,363	9.6%	371,773	8.9%
Public transportation (excluding taxicab)	7,157,671	5.1%	59,087	1.4%
Walked	3,932,118	2.8%	91,329	2.2%
Other means	2,530,707	1.8%	52,149	1.2%
Worked at home	6,171,591	4.4%	152,941	3.6%
Mean travel time to work (minutes)	25.7		24.1	
Source: 2010-2014 ACS 5-Yr Estimates (DP03)				

MAP: Average Travel Time to Work



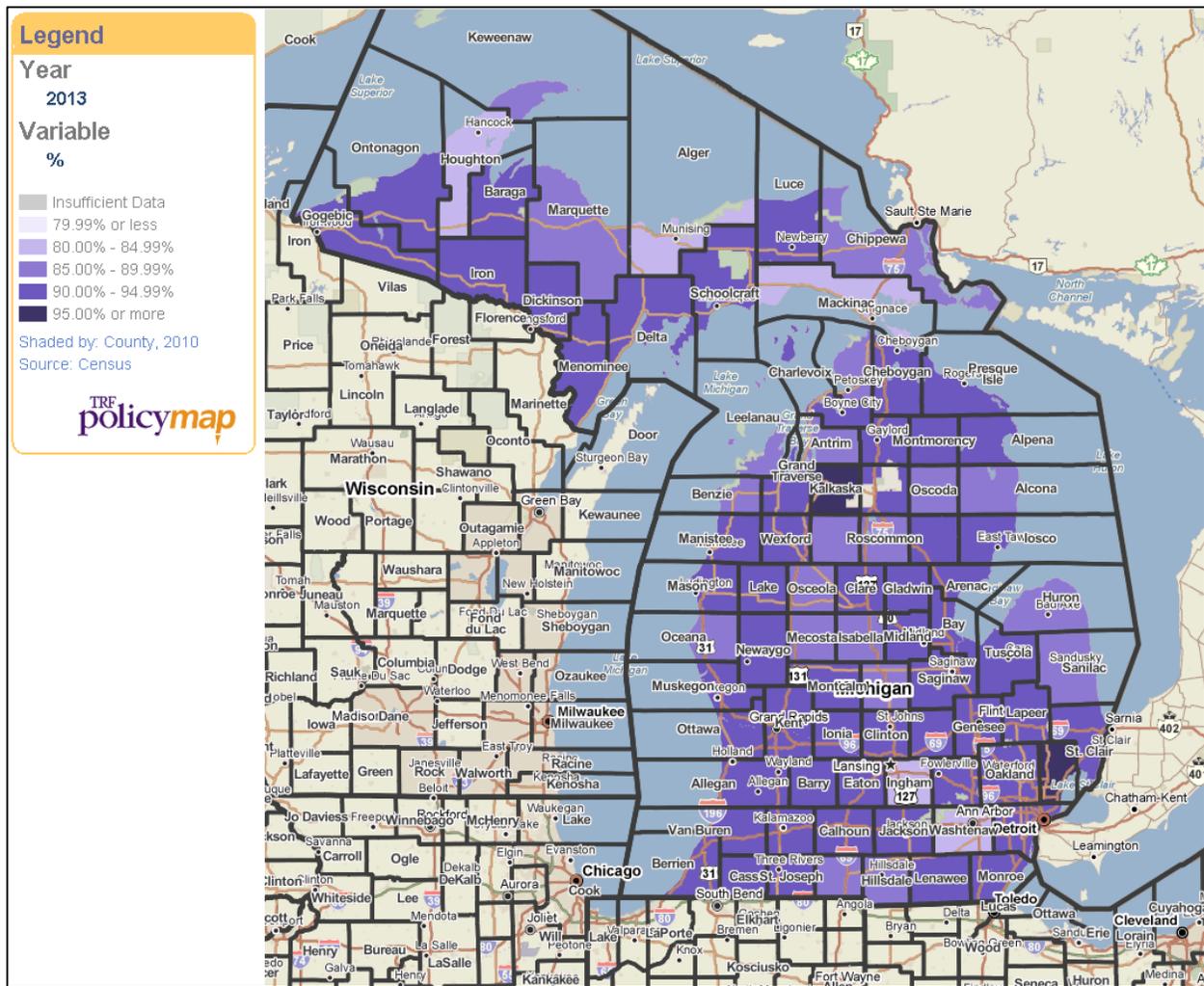
While the mean travel time to work in Michigan was 24.1 minutes, some areas still experience over 30 minutes of average travel time to work, especially in the north and in the areas surrounding the Metro Detroit area. The lightest blue shaded areas represent where travel time is less and travel time increases as the shades become darker.

MAP: Commute Longer Than One Hour



Similarly, in some areas of Michigan, a larger percentage of workers experience a commute longer than one hour, mainly the areas north of Metro Detroit. The lightest shades represent areas where a smaller percent of the population commutes over one hour to work, and that percentage increases as the shades become darker.

MAP: Drive to Work



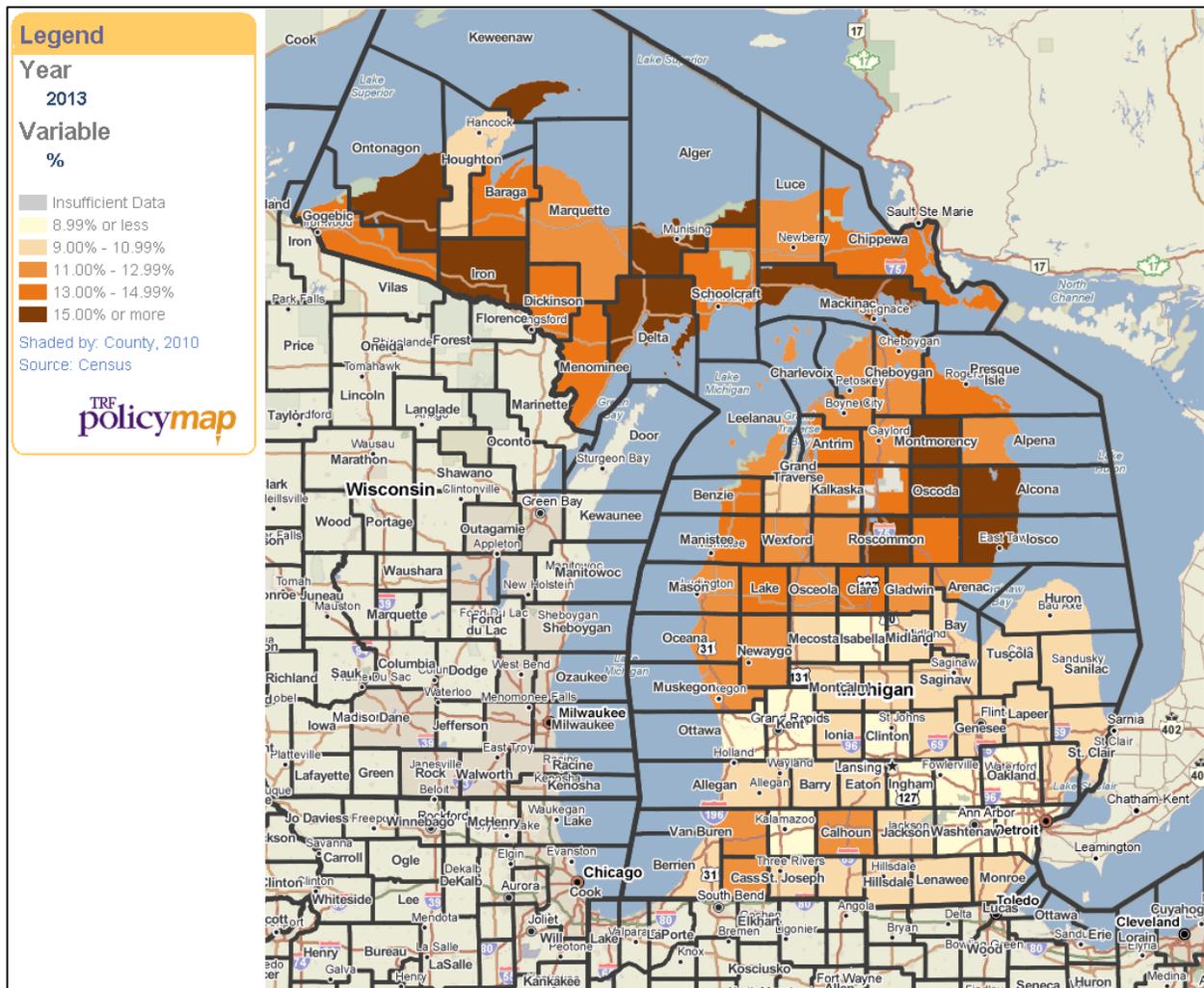
Approximately 82.7 percent of the workers in Michigan drive to work, and there are only a handful of areas where there are fewer workers driving to work than others – of note Ingham and Washtenaw Counties, both of which house major state universities and have relatively robust bus-based transit systems. The lightest shades represent areas where a smaller percent of the population drives to work, and that percentage increases as the shades become darker.

Veterans

According to the 2010-2014 American Community Survey figures, there were 648,273 veterans living in Michigan. Of those, approximately 94.2 percent were male and approximately 5.8 percent were female. Michigan veterans had higher incomes than the state’s civilian population (over 18 and with an income, with veterans having a median income \$34,217 compared to the \$24,642 of non-veterans). The state’s veterans are more likely to have graduated high school but less likely to have a bachelor’s degree than non-veterans. Approximately 91.4 percent of the state’s veterans have at least a high school diploma or equivalent, compared to 89 percent of non-veterans. On the other hand, approximately 20.5 percent of veterans had a bachelor’s degree or higher, compared to 27 percent of non-veterans. Veterans and non-veterans in Michigan experienced similar unemployment rates in 2014, with veterans at 11.5 percent and non-veterans at 11.2 percent. The disability rate among the state’s veterans (approximately 28.8%) is almost double the rate of non-veterans (15.7%). (Data Source: 2010-2014 American Community Survey 5-Yr Estimates S2101)

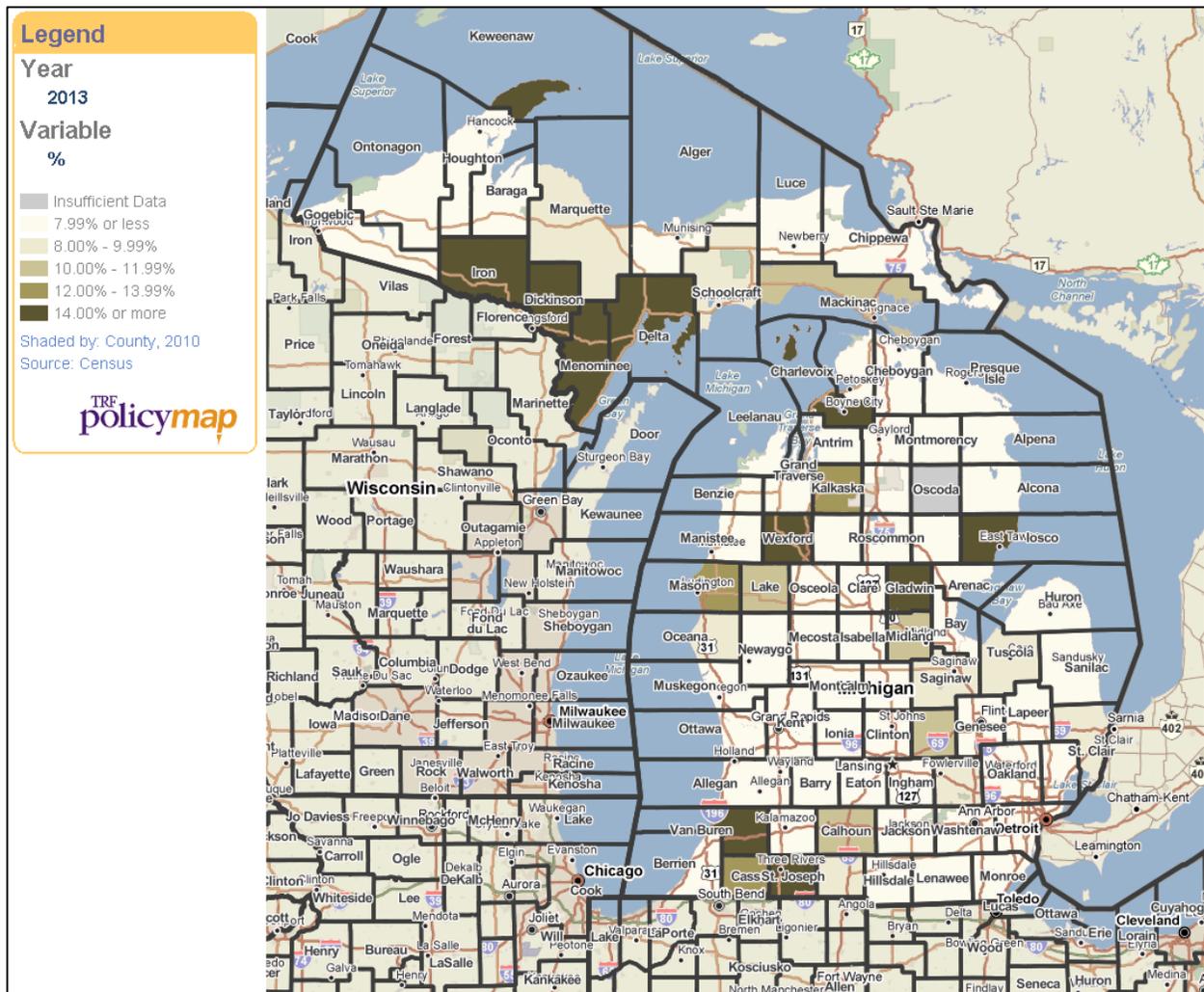
TABLE: Veteran Status				
	United States Veteran	United States non-Veteran	Michigan Veteran	Michigan non-Veteran
Veterans (percent)	8.7%	91.3%	8.5%	91.5%
Male	92.4%	44.3%	94.2%	44.2%
Female	7.6%	55.7%	5.8%	55.8%
Age – 65 to 74 years	22.4%	8.9%	23.7%	9.2%
Age – 75 years and older	22.7%	6.6%	24.5%	7.0%
Median Income	37,466	26,214	34,217	24,642
Unemployment Rate	8.2%	9.1%	11.5%	11.2%
Below Poverty (in past 12 months)	7.0%	14.3%	7.7%	15.5%
With any Disability	27.0%	13.8%	28.8%	15.7%
Graduated High School	29.3%	27.9%	32.9%	29.9%
Some College	36.6%	28.2%	38.0%	32.1%
Bachelor’s Degree or higher	26.6%	29.5%	20.5%	27.0%
Source: 2010-2014 American Community Survey 5-Year Estimates (S2101)				

MAP: White Veterans



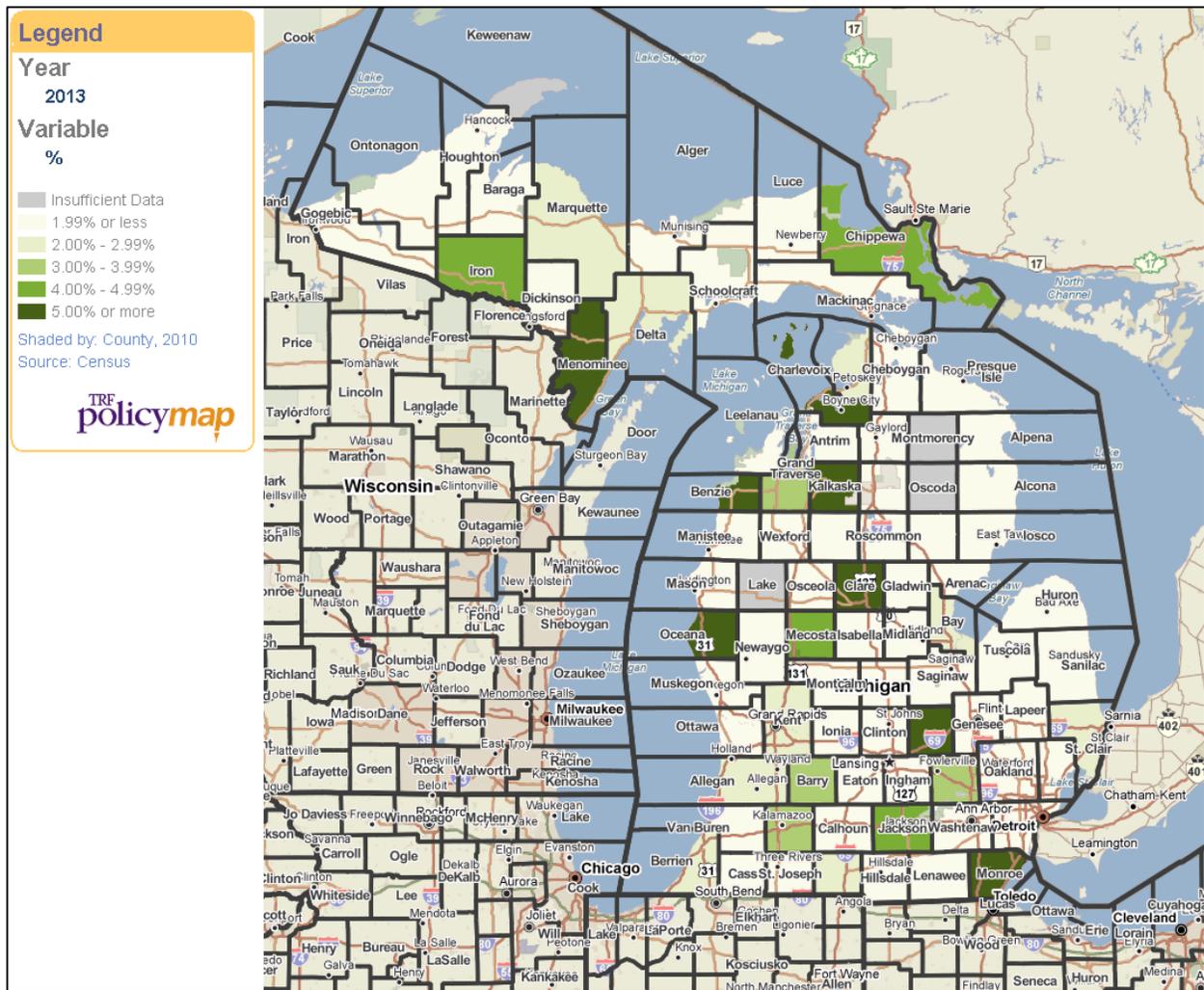
There is a much higher concentration of White veterans in the northern areas of Michigan in comparison to the rest of the state. The lightest shades represent areas with a smaller percent of White veterans, and that percentage increases as the shades become darker.

MAP: Black or American African Veterans



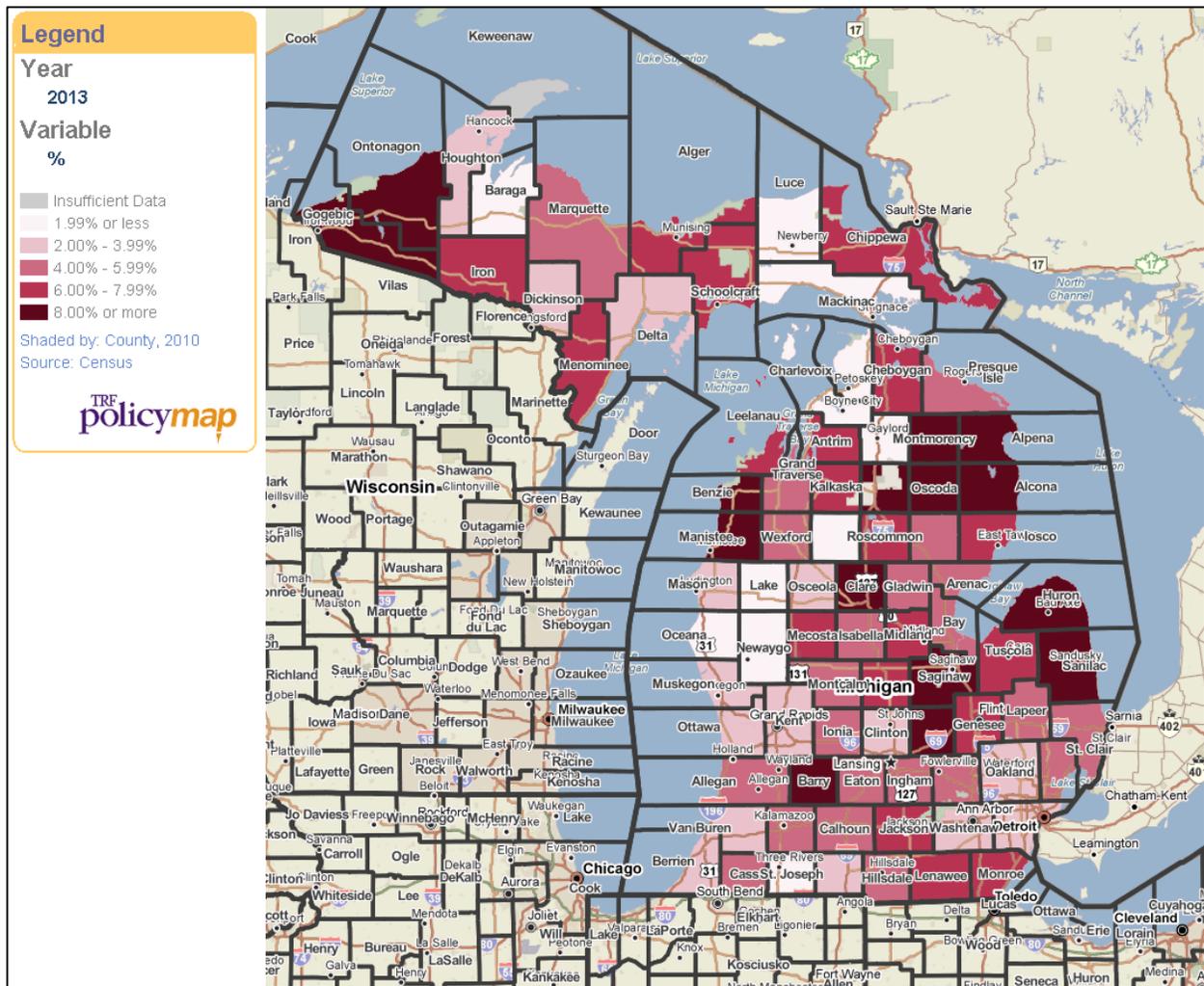
Similarly, there is a higher concentration of Black or African American veterans in the northern areas of Michigan in comparison to the rest of the state, with the exception of Van Buren and St. Joseph counties in southwest Michigan. The lightest shades represent areas with a smaller percent of Black or African American veterans, and that percentage increases as the shades become darker.

MAP: Asian Veterans



The concentration of Asian veterans varied across the state. The lightest shades represent areas with a smaller percent of Asian veterans, and that percentage increases as the shades become darker.

MAP: Hispanic or Latino Veterans



The concentration of Hispanic or Latino veterans varied throughout the state. The lightest shades represent areas with a smaller percent of Hispanic or Latino veterans, and that percentage increases as the shades become darker.

Housing Profile

Housing Type & Size

Housing in the State of Michigan is changing. Since 2000, the number of 1-unit detached structures has increased by nearly 300,000 and the number of 1-unit attached structures has increased by nearly 50,000. In the same time period there has been a noticeable reduction in the amount of 2-unit and Mobile Home structures in the state. The majority of this shift happened between 2000 and 2009.

According to the 2010-2014 American Community Survey estimates, 1-unit detached structures made up the largest percent of types of unit in Michigan at 72 percent (3,262,082 units). The second largest unit type in the state, Mobile Homes, make up only 5.4 percent (245,882 units) of the total structures and 20 or More Unit properties come in a close third with 5.0 percent (225,494 units). In addition to the growth in the number of housing units, particularly 1-unit detached structures, there have been programs implemented in Michigan to demolish dangerous and blighted homes. Studies have shown that the destruction of such properties can increase property value and community safety.

One example of such a program is the Genesee Land Bank (GLB), which operates in Flint. The GLB was formed in 2004 to respond to the tax foreclosure cycle within the county. One of the tools the GLB uses to accomplish its mission is the demolition of blighted properties. The average cost of a demolition of a house is \$11,600 and since the GLB's creation they have demolished 4,993 homes. Prior to demolishing a residence, the GLB purchases the property and assesses its condition. If the buildings on the property are found to be dangerous or structurally deficient the GLB demolish the buildings to free up the property for better uses. Similarly, the City of Detroit has made aggressive use of federal funding to demolish vacant and blighted homes, in July 2016 celebrating the 10,000th demolition since Mayor Mike Duggan took office in 2014.

It should be noted that HUD's definition of multifamily is a structure with more than four housing units; 1-4 unit structures are identified as "single family." Given HUD's definitions of single-family housing, the data show that the most prevalent housing type in Michigan is overwhelmingly the single-family unit, with 81.9 percent of all housing in 2014. In 2000, 80.8 percent of all housing units in Michigan were single-family.

TABLE: Residential Properties by Type & Number of Units						
Property Type	2000		2009		2014	
	Number	%	Number	%	Number	%
1-unit detached structure	2,988,818	70.6%	3,242,128	71.7%	3,262,082	72.0%
1-unit, attached structure	164,910	3.9%	203,531	4.5%	211,262	4.7%
2 units	146,414	3.5%	128,692	2.8%	116,964	2.6%
3 or 4 units	118,067	2.8%	119,212	2.6%	116,039	2.6%
5-9 units	169,946	4.0%	186,287	4.1%	190,503	4.2%
10-19 units	144,848	3.4%	164,404	3.6%	163,537	3.6%
20 or more units	216,573	5.1%	214,497	4.7%	225,494	5.0%
Mobile Home	277,158	6.5%	263,016	5.8%	245,882	5.4%
Boat, RV, van, etc.	7,545	0.2%	833	0.0%	956	0.0%
<i>Total</i>	4,234,279	-	4,522,600	-	4,532,719	-
Data Source: 2000 Census DP-4, 2005-2009 ACS 5-Year Estimates DP04, 2010-2014 ACS 5-Year Estimates DP04						

According to the 2010-2014 ACS, 1-unit detached structures are the most common housing units by far in the country with 61.7 percent of all property types. In Michigan, the percentage of 1-unit detached structures is 72 percent – more than 10 points higher than the national average. When compared to the three states that border Michigan, the percentage of 1-unit detached structures is also higher than the country as a whole making this property type more prevalent in this region of the country.

TABLE: Percentage of Housing Property Type, 1-unit detached structure – 2014 National Comparison					
Property Type	United States	Michigan	Indiana	Ohio	Wisconsin
1-unit detached structure	61.7%	72.0%	72.7%	68.5%	66.6%
Data Source: 2010-2014 ACS 5-Year Estimates DP04					

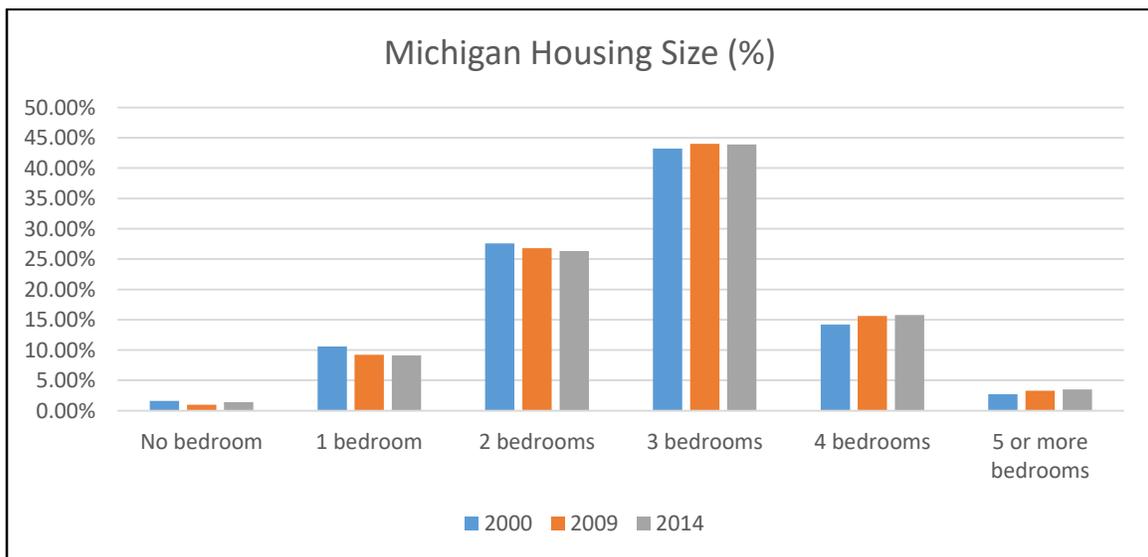
Housing Unit Size

Since 2000, the average housing unit size in Michigan has not changed much. There has been a small shift towards larger houses, but the shift is not dramatic. The number of no-bedroom, one-bedroom, and two-bedroom houses decreased slightly, while three-bedroom, four-bedroom, and 5- or more bedroom houses saw a slight increase. Three bedroom units make up the largest portion of the state’s housing stock by far (43.9% of all units, up from 43.2% in 2000). The second largest housing size is two bedroom units at 26.3 percent – down from 27.6 percent in 2000. At 12.8 percent of the housing stock, four-bedroom units account for the third largest housing size in Michigan. The table below compares unit sizes from 2000 to 2014.

Table: Housing Units by Size						
	2000		2009		2014	
	Number	%	Number	%	Number	%
No bedroom	67,653	1.6%	43,861	1.0%	61,309	1.4%
1 bedroom	449,950	10.6%	415,760	9.2%	412,938	9.1%
2 bedrooms	1,170,076	27.6%	1,213,898	26.8%	1,193,551	26.3%
3 bedrooms	1,830,583	43.2%	1,990,872	44.0%	1,991,378	43.9%
4 bedrooms	601,730	14.2%	707,517	15.6%	716,272	15.8%
5 or more bedrooms	114,287	2.7%	150,692	3.3%	157,271	3.5%
Total Housing Units	4,234,279	100.0%	4,522,600	100.0%	4,532,719	100.0%

Data Source: 2000 Census H041, 2005-2009 ACS 5-Year Estimates DP04, 2010-2014 ACS 5-Year Estimates DP04

As noted above, there is a shift in housing size but the shift is relatively small. The chart below visualizes the shift.



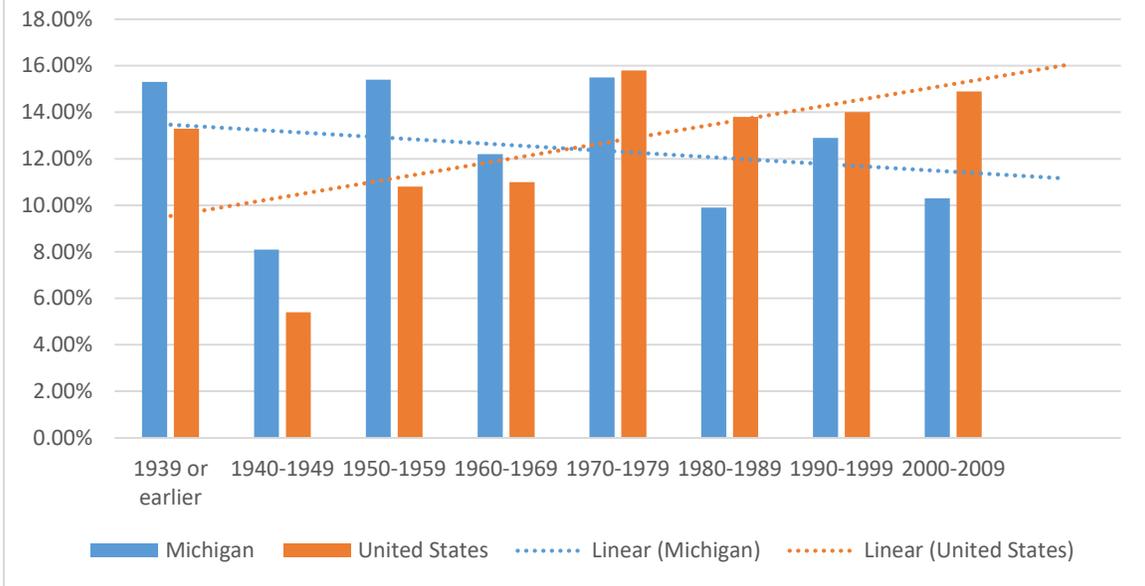
HOUSING CONDITIONS

The table below compares the age of Michigan’s housing stock by year cohort with the same group in the United States. The largest cohort in the state is units built between 1970 and 1979, comprising 15.5 percent of the state’s housing stock (701,671 units). The same cohort in the United States is the largest at 15.8 percent of the national housing stock – nearly 21 million units.

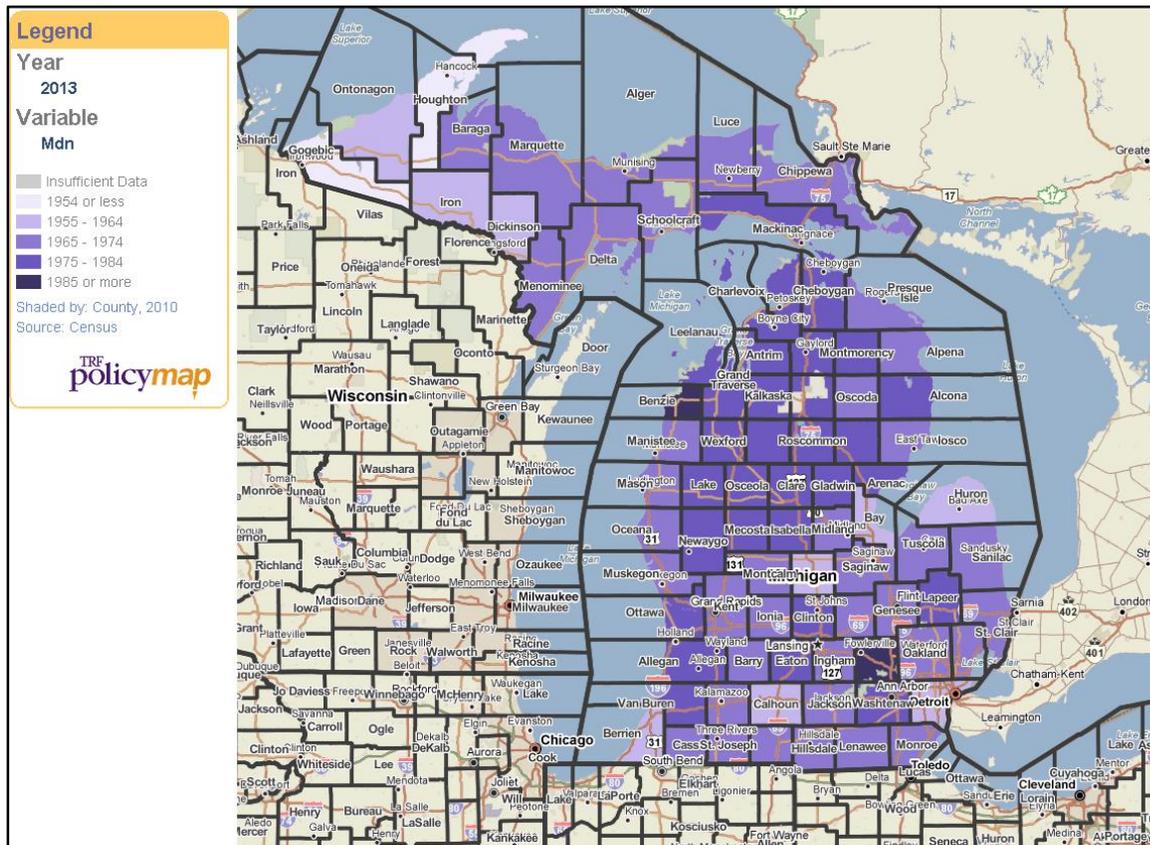
TABLE: Year Unit Built				
	United States		Michigan	
Range	Number	%	Number	%
Built 2010 or later	1,315,426	1.0%	19,090	0.4%
Built 2000 to 2009	19,803,260	14.9%	466,547	10.3%
Built 1990 to 1999	18,512,067	14.0%	584,962	12.9%
Built 1980 to 1989	18,346,272	13.8%	450,502	9.9%
Built 1970 to 1979	20,978,482	15.8%	701,671	15.5%
Built 1960 to 1969	14,626,326	11.0%	552,261	12.2%
Built 1950 to 1959	14,374,462	10.8%	698,088	15.4%
Built 1940 to 1949	7,119,373	5.4%	367,451	8.1%
Built 1939 or earlier	17,665,365	13.3%	692,147	15.3%
Total	132,741,033	100.0%	4,532,719	100.0%
Data Source: American Community Survey 2010-2014 5 Year Estimates B25034				

The State of Michigan and the United States share the same largest age cohort (built between 1970 and 1979), but housing in Michigan tends to be older than the country as a whole. The chart below displays the percentage of homes built in each year with a linear trend line. Michigan’s housing stock shows a negative trend line, and the majority of the population of Michigan (51%) lives in homes that were built before 1970. In the United States as a whole, a majority of the population (59.5%) lives in homes that were built after 1970. The final cohort (Built 2010 or later) was removed from the chart below because it is an incomplete decade, but housing units within that cohort in Michigan are less than half the rate of housing units in the United States as a whole.

Age of Housing: Michigan and the United States



MAP: Median Year Built



The map above shows the median year built for housing units by county. Gogebic and Houghton counties in the western portion of the Upper Peninsula have the oldest housing in the state. The lightest purple shaded areas represent where the median year built (MYB) for housing units was 1954 or before, and light purple shaded areas show where MYB is between 1955 and 1964. The medium purple shaded areas represent where MYB is between 1965 and 1974. The darker purple shaded areas represent where MYB is between 1975 and 1984 and the darkest purple shaded areas represent where MYB is 1985 or afterwards.

HOUSING OCCUPANCY CHARACTERISTICS

The table below compares renter and owner occupancy data in Michigan for 2000, 2009, and 2014.

HOUSING OCCUPANCY

TABLE: Housing Occupancy									
	2000		2009		% Change 2000- 2009	2014		% Change 2009- 2014	% Change 2000- 2014
	Number	%	Number	%		Number	%		
Total Units	4,234,279	100%	4,522,600	100%	6.8%	4,532,719	100%	0.2%	7.0%
Occupied Units	3,785,661	89.4%	3,860,160	85.4%	2.0%	3,827,880	84.4%	-0.8%	11.2%
Owner Occupied Units	2,793,124	73.8%	2,879,917	74.6%	3.1%	2,738,012	71.5%	-4.9%	-2.0%
Renter Occupied Units	992,537	26.2%	980,243	25.4%	-1.2%	1,089,868	28.5%	11.2%	9.8%
Data Source: Census 2000 QT-H1, ACS 2005-2009 5-Year Estimates DP04, ACS 2010-2014 5-Year Estimates DP04									

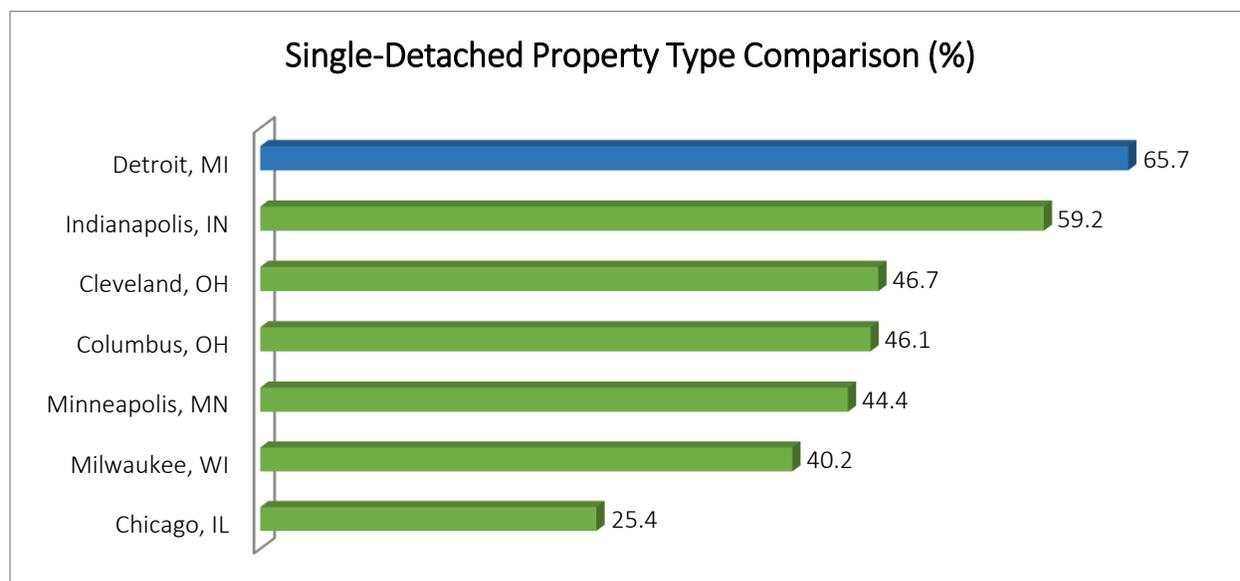
Between 2000 and 2014, the number of housing units increased by nearly 300,000, but the number of occupied housing units only increased by approximately 42,000. This gap has led to a decrease in the percentage of occupied units from 89.4 percent in 2000 to 84.4 percent in 2014. This reduction was almost exclusively in owner-occupied housing. Owner-occupied housing units saw both a relative decrease from 73.8 percent to 71.5 percent of the occupied housing, as well as a decrease in real numbers from 2,793,124 to 2,738,012. Renter-occupied housing, on the other hand, grew from 26.2 percent to 28.5 percent of the occupied housing units, which was in an increase of nearly 100,000 units. These shifts are even more dramatic when looking at the period of 2009-2016 where owner-occupied units, which had increased from 2000, declined by nearly 142,000 with a commensurate increase of rental units during the same timer period of nearly 110,000 units. It is likely that much of that shift has been due to the foreclosure crisis and conversion of single-family homes from owner-occupied to rental.

Owner-occupied housing is more prevalent than renter-occupied housing in Michigan and generally as well in the rest of the country. Approximately 71.5 percent of occupied units in the state are owner-occupied. This is higher than the national rate, and higher than the three states that border Michigan.

Housing Tenure	United States	Michigan	Indiana	Ohio	Wisconsin
Owner-occupied	64.4%	71.5%	69.5%	66.9%	67.7%
Renter-occupied	35.6%	28.5%	30.5%	33.1%	32.3%

Data Source: 2010-2014 ACS 5-Year Estimates DP04

A higher owner-occupied housing rate in Michigan as compared to the rest of the country can be partially explained by the prevalence of single detached housing property types in urban metro areas, most notably Detroit, in a comparison to other large metro areas in the Midwest region and in the country. Single-detached housing property types traditionally cater to homeownership and are less amenable for the renting population, which includes individuals and small households. The chart below displays a comparison of the percentage of single-detached housing property types in Detroit as compared to other large cities in the Midwest region.

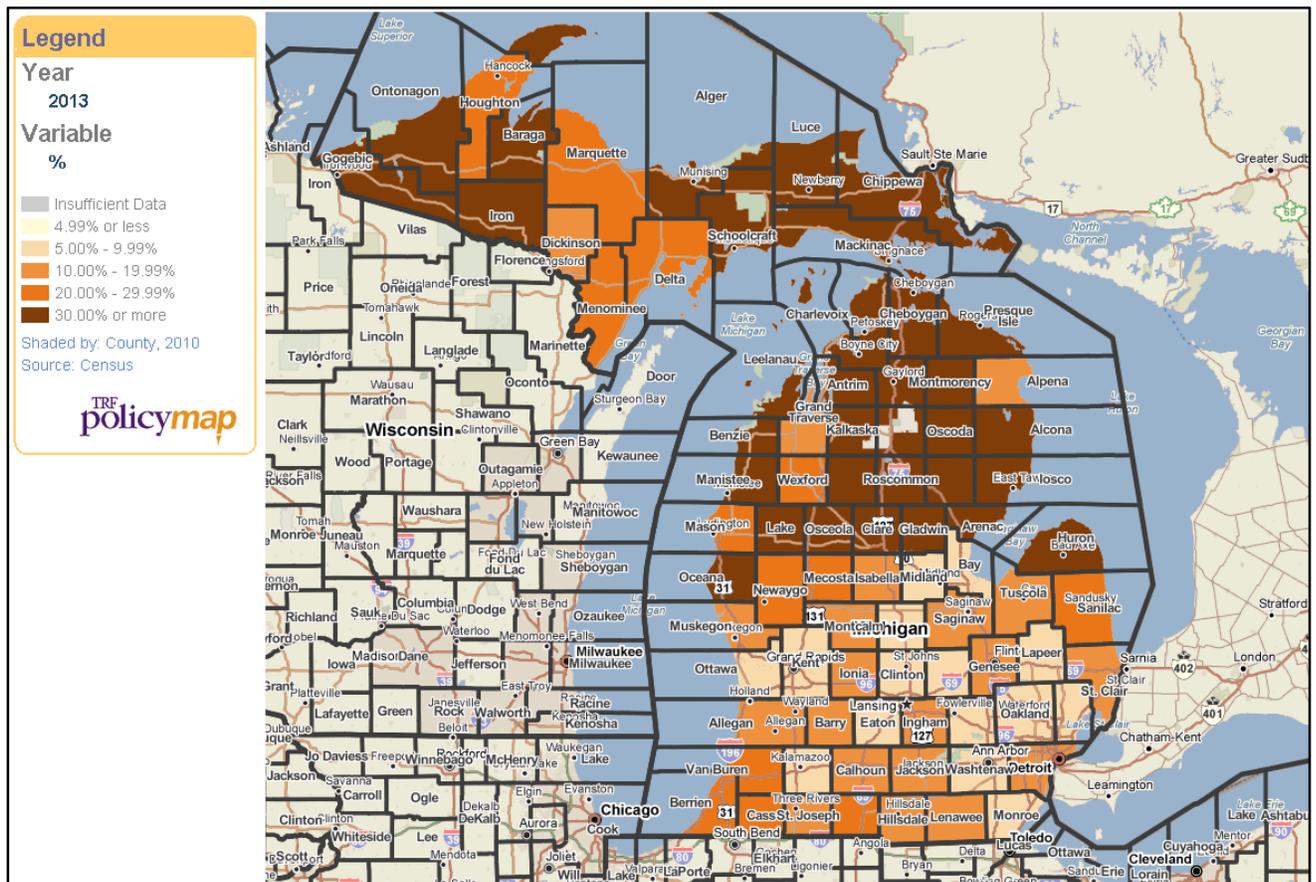


Data Source: 2010-2014 American Community Survey 5-Yr Estimates (DP04)

Data Note: Selected cities in the Midwest region with a population over 300,000.

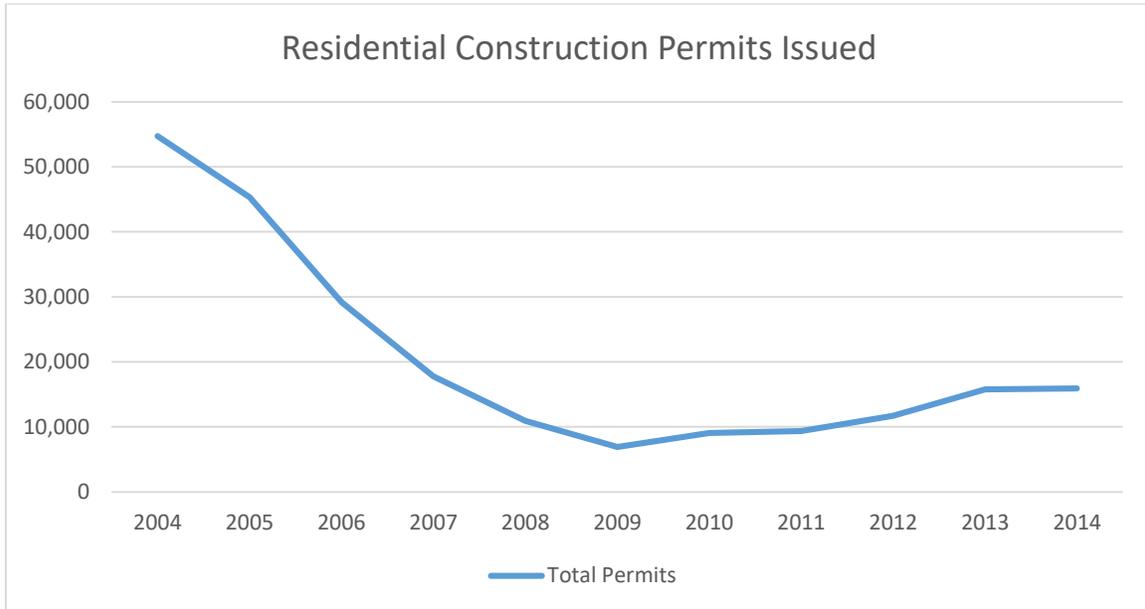
The map below depicts the residential vacancy rates by county for the state. Much of the Upper Peninsula and northern Lower Peninsula had vacancy rates of over 30 percent in 2013. In the Upper Peninsula, only Dickinson County had a vacancy rate below 20 percent. To some degree, the vacancy rates in these areas are influenced by the many “Up North” cottages, cabins, and second homes, but other factors including the relative decline in population are likely more significant. The lighter shaded areas have a lower vacancy rate, and the darker areas have a higher vacancy rate.

MAP: Vacancy Rates

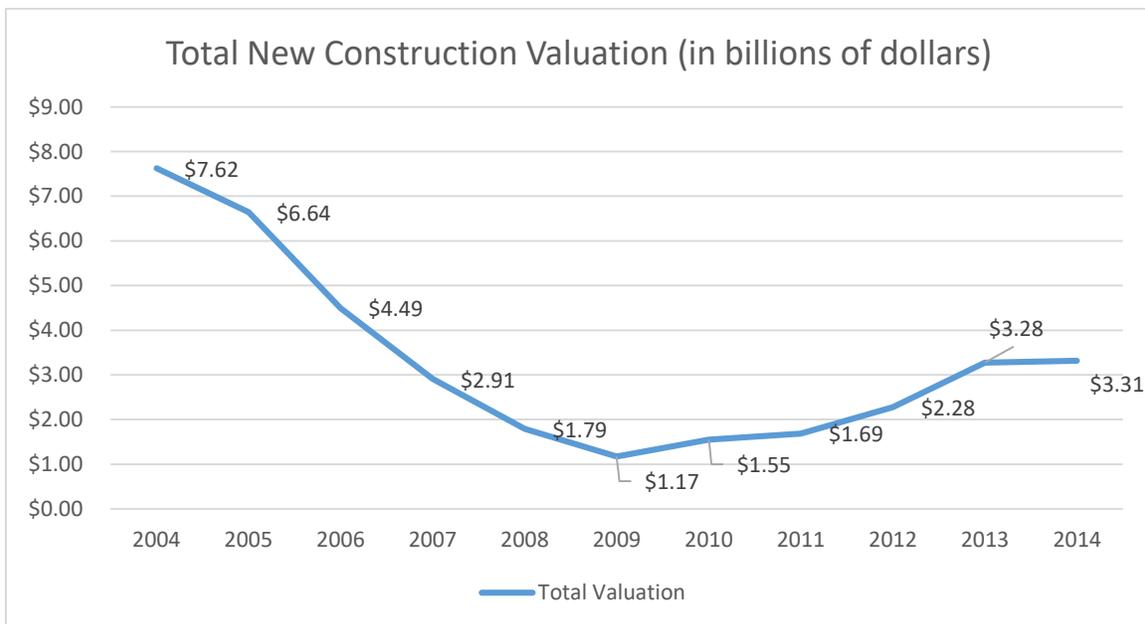


Construction Activity

The line graphs below depict the collapse of the housing market and very slow recovery between 2004 and 2013 throughout the State of Michigan. The first graph displays the steep decline in the number of residential building permits issued each year between 2004 and 2013. In 2010 residential construction started to improve, but the growth has been incredibly slow and still only a fraction of what it was in 2004.



This second graph details the precipitous drop in the total valuation of new construction building permits each year during the same period. As with the residential construction permits, the total valuation of residential building permits dropped sharply in 2004 and did not start to recover until 2010, but that recovery has been slow and is incomplete.



The “Missing Middle”

In order for a community to see economic growth and development, it is necessary to have diverse housing options. Offering a variety of housing options allows communities to both attract, as well as retain, talent. As people’s lives change they need to have new and varied housing options. Young talent who come to a new city may not remain if they lack opportunities for housing in all stages of life, including getting married, raising children, and retiring. Research has shown that many communities suffer from a “missing middle” housing problem. There are generally a lot of housing options in medium or large apartment complexes and single-unit detached structures in the suburbs, but there is not much between those two extremes. Duplexes, townhouses, courtyard apartment complexes, and other similar housing structures are often missing.

The following table shows the availability of different housing types within Michigan and its seven largest cities. Five unit types are used to *approximate* the “missing middle” housing types: 1-unit attached, 2 units, 3 or 4 units, and 5 to 19 units. Sterling Heights has the highest availability of missing middle housing options with 41.4 percent, followed by Ann Arbor with 35.8 percent, and Grand Rapids with 27.6 percent. Flint has the lowest relative availability of missing middle homes with 13.2 percent.

TABLE: Housing Type Availability in the State of Michigan and Largest Cities								
	1-unit, detached	1-unit, attached	2 units	3 or 4 units	5 to 9 units	10 to 19 units	20 or more units	% “Missing Middle” Housing
<i>Michigan</i>	72.0%	4.7%	2.6%	2.6%	4.2%	3.6%	5.0%	14.2%
Detroit	65.7%	7.2%	7.5%	2.4%	2.3%	3.0%	11.4%	19.4%
Grand Rapids	58.4%	5.9%	10.8%	6.2%	4.7%	4.5%	9.2%	27.6%
Warren	75.4%	7.9%	0.7%	2.3%	6.4%	1.1%	3.6%	17.3%
Sterling Heights	65.1%	10.5%	0.7%	3.0%	9.9%	2.4%	5.1%	41.4%
Lansing	63.6%	7.1%	3.1%	2.9%	5.3%	8.8%	7.8%	18.4%
Ann Arbor	41.9%	11.2%	4.4%	6.3%	13.9%	8.8%	13.2%	35.8%
Flint	77.5%	2.3%	3.7%	3.4%	3.8%	2.8%	4.2%	13.2%

Source: American Community Survey 5-Year Estimates 2009-2014, DP04
 Note: Total housing for each location does not equal 100% because two categories (Mobile Home and Boat/RV/Van) have been removed from the table.

By looking at the population change within a city (both overall and for the working age demographic) we can see if there is a correlation between the availability of “missing middle” households and attracting and maintaining individuals. The table below looks at selected population changes in Michigan’s largest cities and the size of the missing middle housing. The cities with the largest percentage of missing middle housing options tend to have more positive population growth compared to cities with a lower percentage of missing middle households. One city that stands out is Grand Rapids, which saw a total population

decrease of 3.6 percent between 2000 and 2014, but saw an incredible increase of 32.3 percent in the working age population.

TABLE: Selected Population Change Characteristics			
	Size of Missing Middle	Population Change 2000-2014	Change in Working Age Population Change 2000-2014 (Age 18-64)
Sterling Heights	41.4%	4.9%	3.5%
Ann Arbor	35.8%	1.7%	1.7%
Grand Rapids	27.6%	-3.6%	32.3%
Detroit	19.4%	-26.9%	-22.6%
Lansing	18.4%	-4.0%	-0.1%
Warren	17.3%	-2.8%	-0.5%
Flint	13.2%	-19.5%	-19.7%
Source: American Community Survey 5-Year Estimates (2009-2014), DP02 and B01003; 2000 Decennial Census, DP-1 and DP-3			

According to Dan Parolek, a nationally recognized expert in architecture, design, and urban planning, the “missing middle” housing has four primary characteristics:

- A walkable context;
- Medium density but lower perceived density;
- Small footprint and blended densities; and
- Smaller, well-designed units.

“A walkable context” is considered the most important aspect of the missing middle. Individuals, particularly Millennials, want to be able to travel to stores, gyms, recreation facilities, work, and social environments without needing a car. A survey by The Rockefeller Foundation and Transportation for America found that 54 percent of Millennials would consider moving to another city if it had better options for getting around and 86 percent said that it was important for their city to offer opportunities to live and work without relying on a car.¹³ Millennials are also more willing to move to a new city, and even new countries, if it will provide them with a better work-life balance.¹⁴ According to Global Workplace Analytics, the regular work-at-home population has grown by 103 percent since 2005 and the rate of employees who telecommute grew by 5.6 percent between 2013-2014.¹⁵ Michigan cities are competing globally to attract talent and it is increasingly important to provide the infrastructure necessary to make that happen.

One way to judge how friendly a city is to pedestrians is to look at the walk, bike, and transit score published by Walk Score. Walk Score analyzes hundreds of routes and measures the distance to amenities by various forms of transportation. The first table on the next page shows the scores for walking, biking,

¹³ <http://www.citylab.com/housing/2014/05/what-millennials-wantand-why-cities-are-right-pay-them-so-much-attention/9032/>

¹⁴ <https://hbr.org/2015/05/millennials-say-theyll-relocate-for-work-life-flexibility>

¹⁵ <http://globalworkplaceanalytics.com/telecommuting-statistics>

and transit for Michigan’s largest cities, and the second shows scores for major cities that compete to attract and retain people. Biking and Transit scores are not available for all cities.

	Size of Missing Middle	Walk Score	Bike Score	Transit Score
Sterling Heights	41.4%	31	N/A	N/A
Ann Arbor	35.8%	50	74	47
Grand Rapids	27.6%	55	55	N/A
Detroit	19.4%	55	55	38
Lansing	18.4%	42	52	N/A
Warren	17.3%	43	N/A	N/A
Flint	13.2%	42	N/A	N/A

Source: <https://www.walkscore.com>

	Size of Missing Middle	Walk Score	Bike Score	Transit Score
New York, NY	37.2%	89	65	84
San Francisco, CA	44.9%	86	80	75
Boston, MA	56.4%	81	70	74
Philadelphia, PA	77.6%	78	68	67
Miami, FL	27.2%	78	60	59
Chicago, IL	45.5%	78	70	65
Washington DC	42.4%	77	69	71
Seattle, WA	17.9%	73	63	57
Oakland, CA	30.7%	72	61	55
Long Beach, CA	29.3%	69	66	N/A
Indianapolis, IN	25.3%	29	41	24
Cleveland, OH	37.1%	59	51	47
Columbus, OH	35.8%	40	47	31
Minneapolis, MN	21.2%	68	81	58
Milwaukee, WI	40.8%	61	NA	49

Source: <https://www.walkscore.com>, American Community Survey 5-Year Estimates 2009-2014, DP04

“Medium density but lower perceived density”, “small footprint and blended densities”, and “smaller, well-designed units” are all interrelated characteristics of the buildings in the missing middle. The buildings tend to have a density of 16 to 35 dwellings per acre, depending on the lot size and buildings style. A variety of building types is also important to help foster a diverse community and provide options for families that grow but wish to stay in the same neighborhood. As cities seek to develop more housing

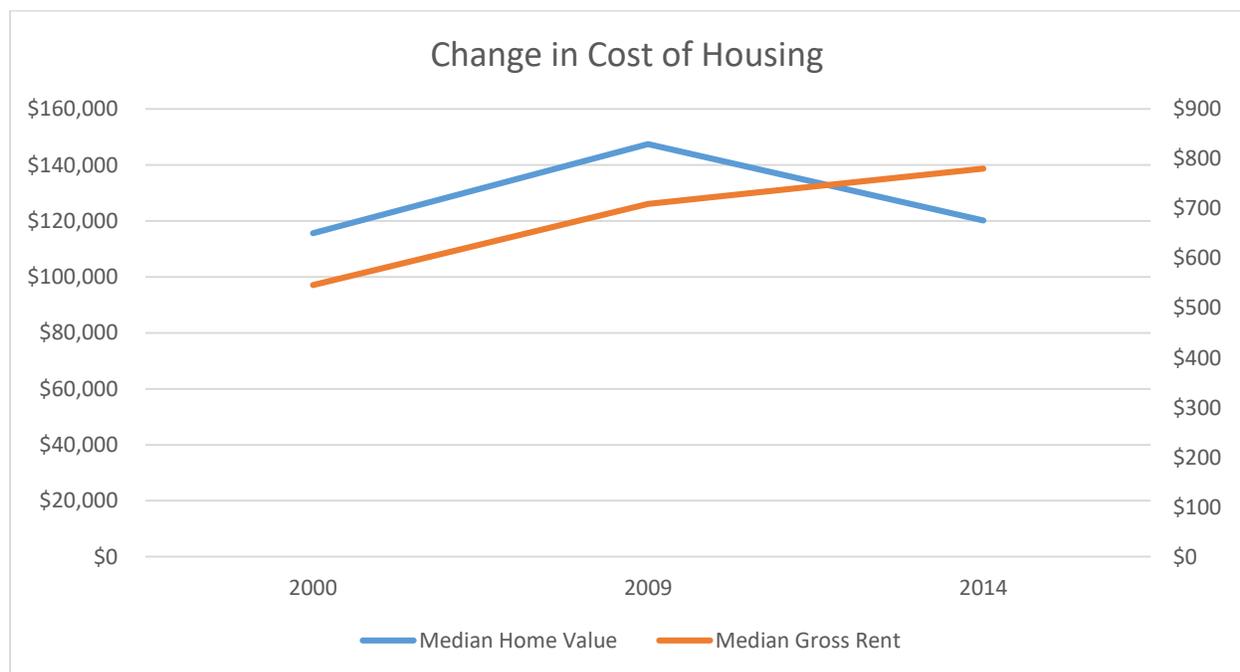
options, whether it is through expansion or through demolition and replacement of dilapidated units, it is important to make sure missing middle housing units are constructed.

The economy of the world is changing rapidly and it is important for cities to adapt to those changes. People have more options than ever when it comes to where they live, particularly in some of the fastest growing economic sectors. In order to attract and maintain talent, cities must provide lots of housing and lifestyle options, and that means filling in the “missing middle” housing gaps.

Housing Costs

The following section examines the housing costs for owners and renters across Michigan. The data tables provide a comparison between the 2000 Census and the 2010-2014 American Community Survey 5-Year Estimates. There are several instances where the ways in which the data were collected and/or reported have changed between the two surveys. In each case, a data note is provided to clarify the data sets being presented.

TABLE: Change in Cost of Housing						
	2000	2009	% Change 2000-2009	2014	% Change 2009-2014	% Change 2000-2014
Median Home Value	\$115,600	\$147,500	27.6%	\$120,200	-18.5%	4.0%
Median Gross Rent	\$546	\$709	29.9%	\$780	10.0%	42.9%
Data Source: 2000 Census DP-4, 2005-2009 ACS 5-Year Estimate DP04, 2010-2014 ACS 5 Year Estimates DP04						

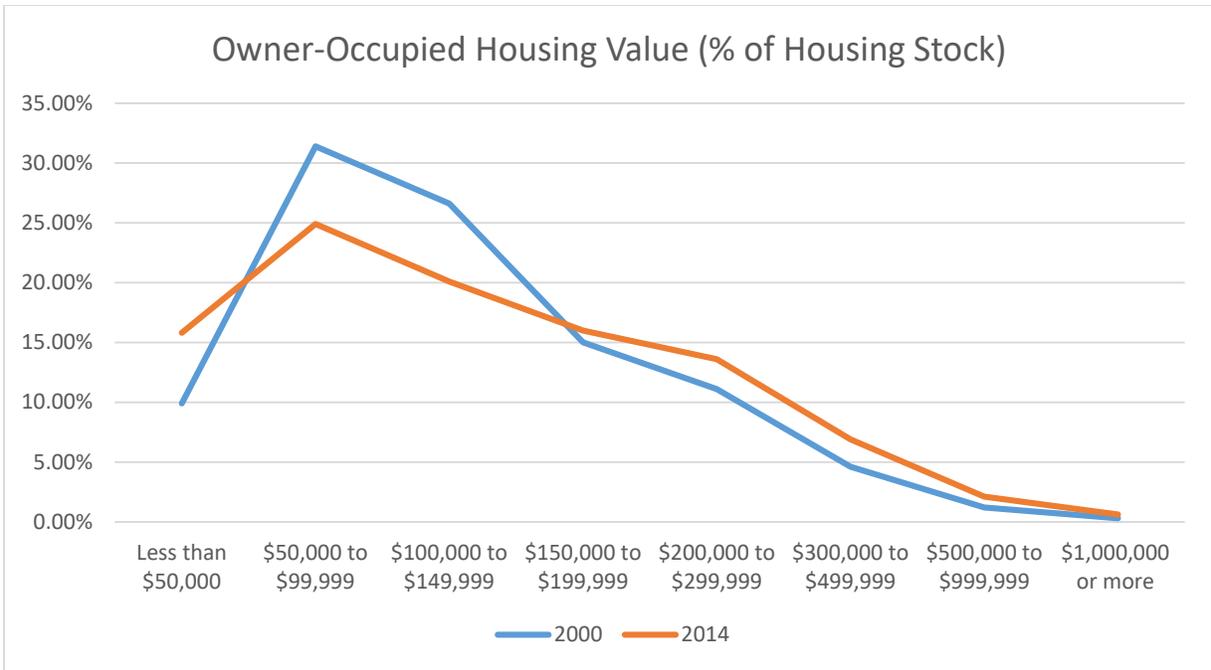


The State of Michigan was hit particularly hard by the economic recession and the collapse of the automobile industry, and this effect has trickled into the housing sector. The chart above illustrates the rise and fall in home values during this period and the steep increase in rents. Median home values for owner occupied homes have increased only 4 percent, but the median rent has increased by 42.9 percent across the state. As detailed above, new unit production is only a fraction of what it once was and occupancy rates have decreased, particularly for homeowners. There are a number of factors influencing this incredibly slow growth. People have been leaving the state in record numbers, as evidenced by the -0.5 percent population growth from 2000-2014 during a time when the United States had 11.6 percent growth. An exodus on this level can flood the housing market and drive down home prices. Also, many communities across the state have instituted programs to demolish vacant housing. For example, to help combat the deterioration of neighborhoods, the Detroit Land Bank Authority began selling vacant lots, also known as “side lots,” to adjacent neighbors for \$100.¹⁶

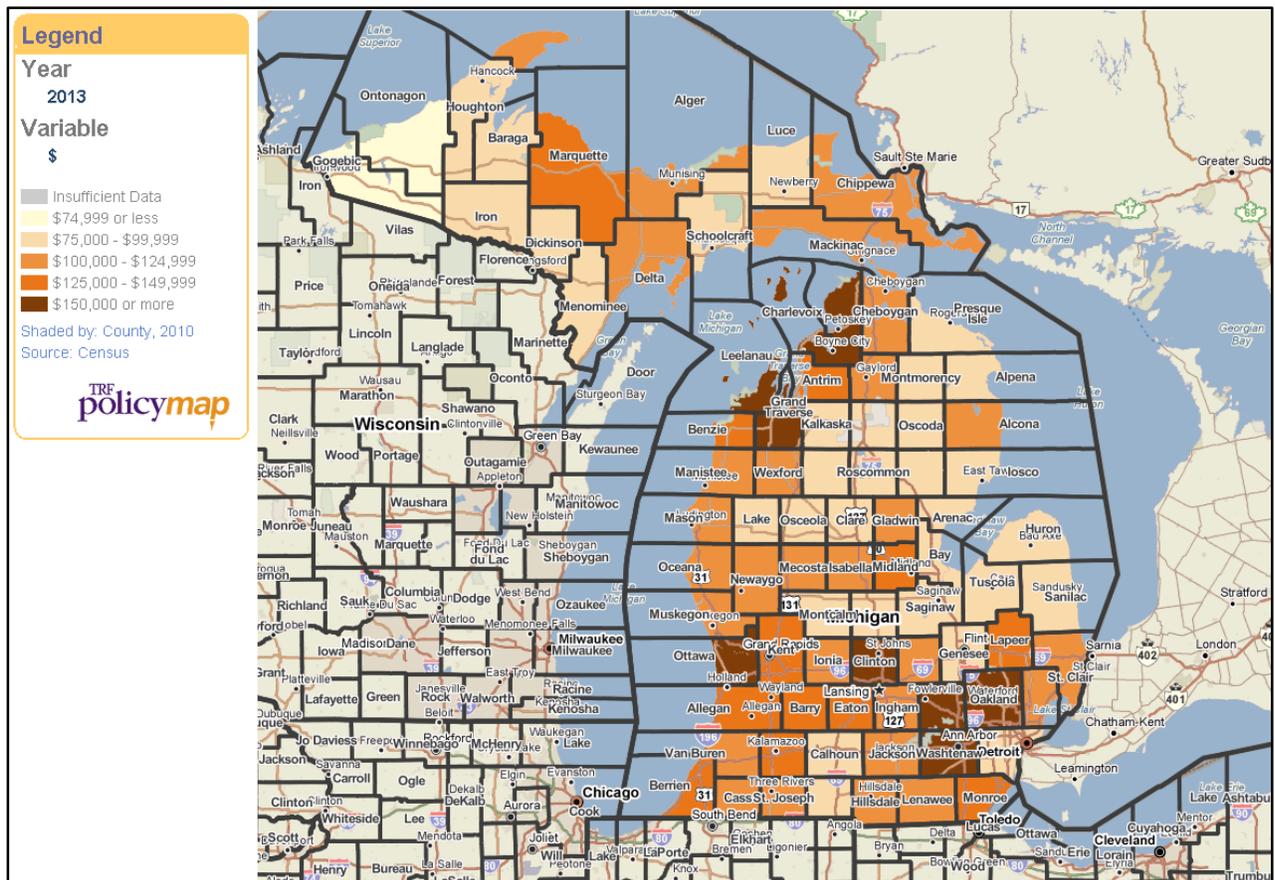
The table and chart below compare 2000 and 2014 home value cohort data for the state. The general trend over time is that lower value cohorts are accounting for smaller portions of the housing stock while higher value cohorts are accounting bigger shares. However, this shift is slow-moving and not universal. The number of homes valued at under \$50,000 increased significantly in both real numbers and as a proportion of the housing stock. This increase in low value homes could be a contributing factor to the relatively low increase in median housing value in the state.

TABLE: Home Value—Owner Occupied Units				
	2000		2010-2014 ACS	
Value	Number	%	Number	%
Less than \$50,000	224,603	9.9%	431,825	15.8%
\$50,000 to \$99,999	711,648	31.4%	681,414	24.9%
\$100,000 to \$149,999	603,454	26.6%	551,567	20.1%
\$150,000 to \$199,999	339,716	15.0%	439,220	16.0%
\$200,000 to \$299,999	252,044	11.1%	371,874	13.6%
\$300,000 to \$499,999	104,079	4.6%	188,963	6.9%
\$500,000 to \$999,999	27,642	1.2%	57,303	2.1%
\$1,000,000 or more	5,989	0.3%	15,846	0.6%
Total Units/Median Value	2,269,175	\$115,600	2,738,012	\$120,200
Data Source: 2000 Census DP-4, 2010-2014 American Community Survey 5 Year Estimates DP04				

¹⁶ <http://www.buildingdetroit.org/our-programs/side-lot-sales/>



MAP: Median Home Value

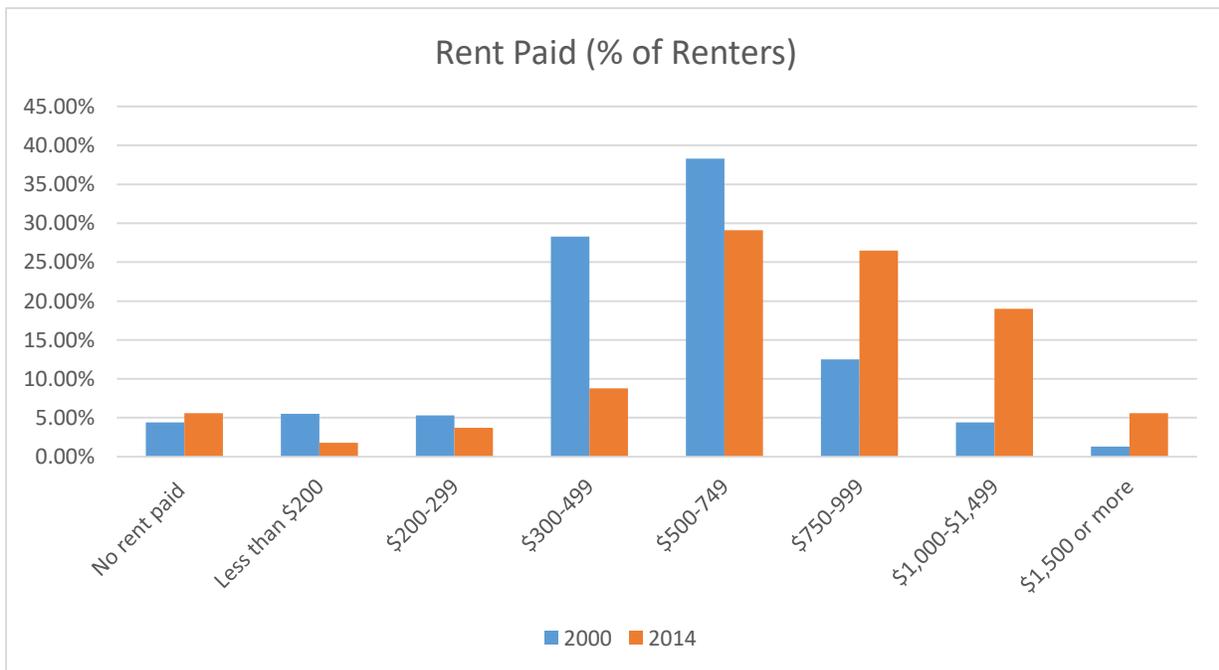


The map below displays the distribution of home values throughout Michigan. The counties surrounding Wayne County had the highest median home value, but Wayne County itself had relatively low home values. The Upper Peninsula also has low home values when compared to the rest of the state. The lighter shaded areas have a lower median home value, and the value increases as the shade darkens.

The table below compares 2000 and 2014 rent cohort data for Michigan. Like owner-occupied units discussed above, the general trend over time is that lower rent cohorts are accounting for smaller portions of the housing stock while higher rent cohorts are accounting for bigger shares. This is to be expected in light of the 42.9 percent growth in median rent since 2000. In 2000, 43.5 percent of renters paid less than \$500, but by 2014 only 19.9 percent of renters were in those price cohorts.

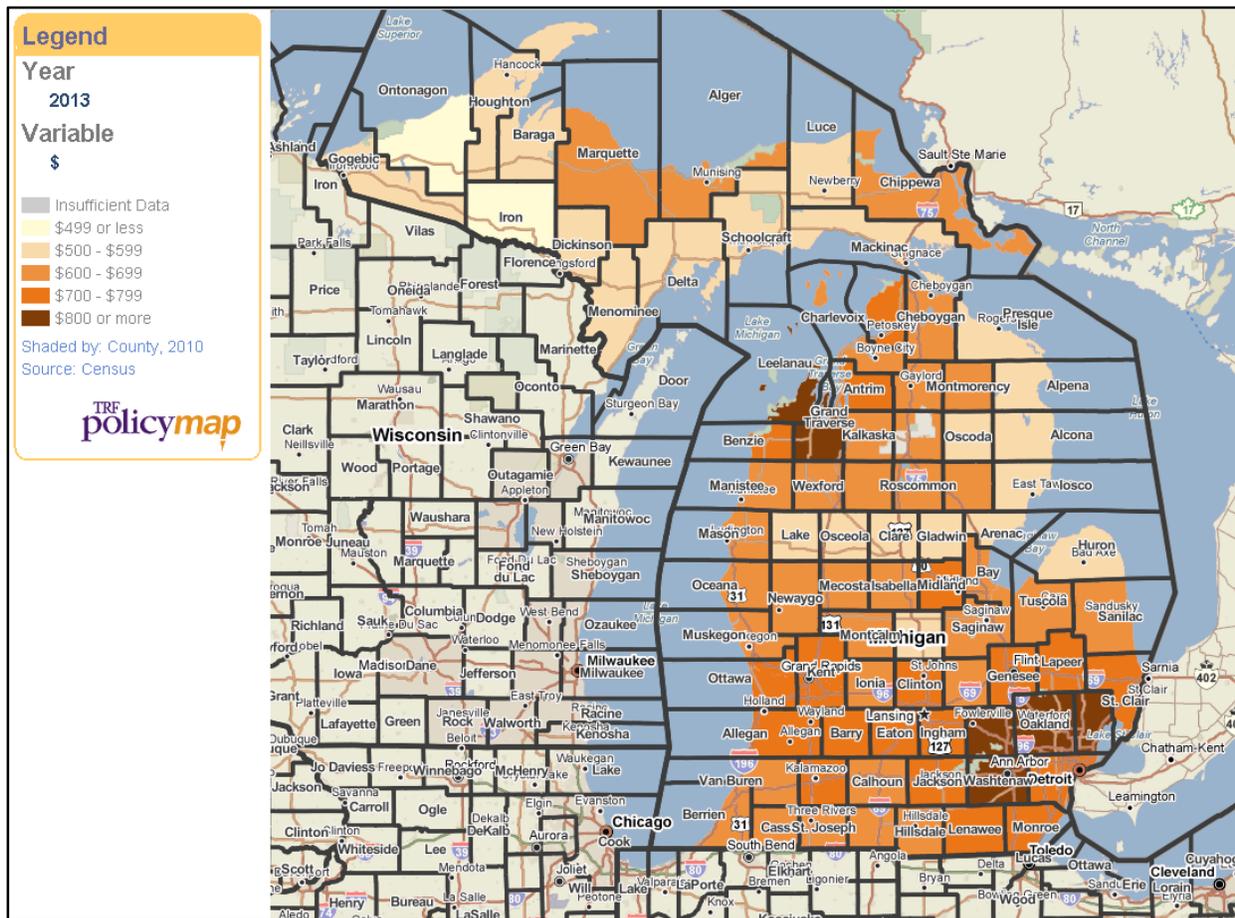
TABLE: Rent Paid				
	2000		2010-2014	
	Number	% of Renters	Number	% of Renters
No rent paid	42,766	4.4%	61,033	5.6%
Less than \$200	53,844	5.5%	19,182	1.8%
\$200-299	52,030	5.3%	39,926	3.7%
\$300-499	275,832	28.3%	95,876	8.8%
\$500-749	373,820	38.3%	316,871	29.1%
\$750-999	122,289	12.5%	288,644	26.5%
\$1,000-\$1,499	42,865	4.4%	207,491	19.0%
\$1,500 or more	12,867	1.3%	60,845	5.6%
	Total Units	Median Rent	Total Units	Median Rent
	976,313	\$531	1,089,868	\$780

Data Source: 2000 Census DP-4, 2010-2014 American Community Survey 5 Year Estimates DP04



The map below shows the distribution of median rent throughout Michigan. The median rent for the state was \$780, but that figure varied across the state (2013 ACS). The lighter shades represent a lower median rent, and the median rent increases as shades darken. The areas with the highest median rent (\$800/month or more) are in Leelanau and Grand Traverse counties on the shore of Lake Michigan and the four counties surrounding Wayne County.

MAP: Median Rent

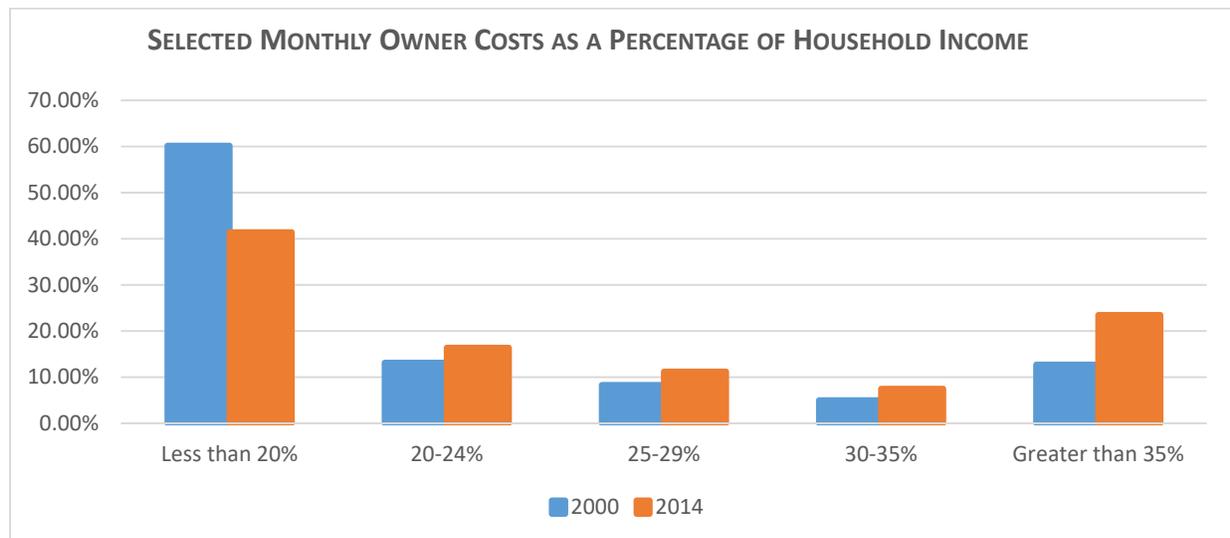


HOUSING AFFORDABILITY

The table below compares 2000 Census and 2010-2014 ACS data on the monthly costs incurred by homeowners in Michigan.¹⁷ By HUD's definition, households paying in excess of 30 percent of their household income towards housing costs (renter or owner) are said to be cost burdened.

TABLE: Selected Monthly Owner Costs as a Percentage of Household Income				
	2000		2010-2014 ACS	
	(all owners)		(owners with mortgage)	
	Number	%	Number	%
Less than 15%	947,804	41.8%	-	-
15 to 19%	416,803	18.4%	-	-
Less than 20%	-	-	717,379	41.4%
20 to 24%	297,909	13.1%	284,678	16.4%
25 to 29%	188,161	8.3%	194,544	11.2%
30 to 35%	112,427	5.0%	129,789	7.5%
35% or more	288,961	12.7%	407,362	23.5%
Not computed	17,110	0.8%	8,380	-

Data Source: 2000 Census DP-4, 2010-2014 American Community Survey 5 Year Estimates DP04



¹⁷ Note: the 2000 Census includes all owner households (even those without a mortgage and those where calculations could not be made) in the percentages for each income range. However, the 2010-2014 ACS only includes owners with a mortgage, where the calculations could be made, in the percentages for each income range. Therefore, some of the increase between the 2000 Census and the 2010-2014 ACS can be attributed to the change in the way the Census Bureau reports these figures.

According to HUD's definition, a homeowner is considered cost burdened if they pay 30 percent or more of their income towards housing costs. In 2000, 17.7 percent of all owners were considered cost burdened, 5.0 percent paid between 30 percent and 35 percent of their income costs and 12.7 percent paid over 35 percent of their income. As of the 2013 calculations, nearly one third (31%) of all owners, with a mortgage, were cost burdened including 23.5 percent who were paying over 35 percent – a sharp rise since 2000.

Again, at least some of the significant increase from year to year can be attributed to the change in the way the data is presented, but that should not lessen the significance of such a high percentage of owner households facing extreme cost related burdens. The next map depicts concentrations of cost burdened owner-occupied households.

While the number of cost burdened owner households in Michigan in 2014 was 31 percent, the distribution of cost burdened households varied throughout the state. Some counties saw a very high number of cost burdened households while others saw a lower percentage. Lake County (47%), Roscommon County (44.1%), and Ontonagon County (43.8%) had the highest number of owner households that were cost burdened. On the other end of the spectrum are Marquette County (21%) and Houghton County (23.9%), and Midland County (24%) had the lowest number of owner households that were cost burdened. The lighter shaded areas have a lower concentration of cost-burdened households, and the concentration increases as the shade darkens.

MAP: Cost Burdened Homeowners

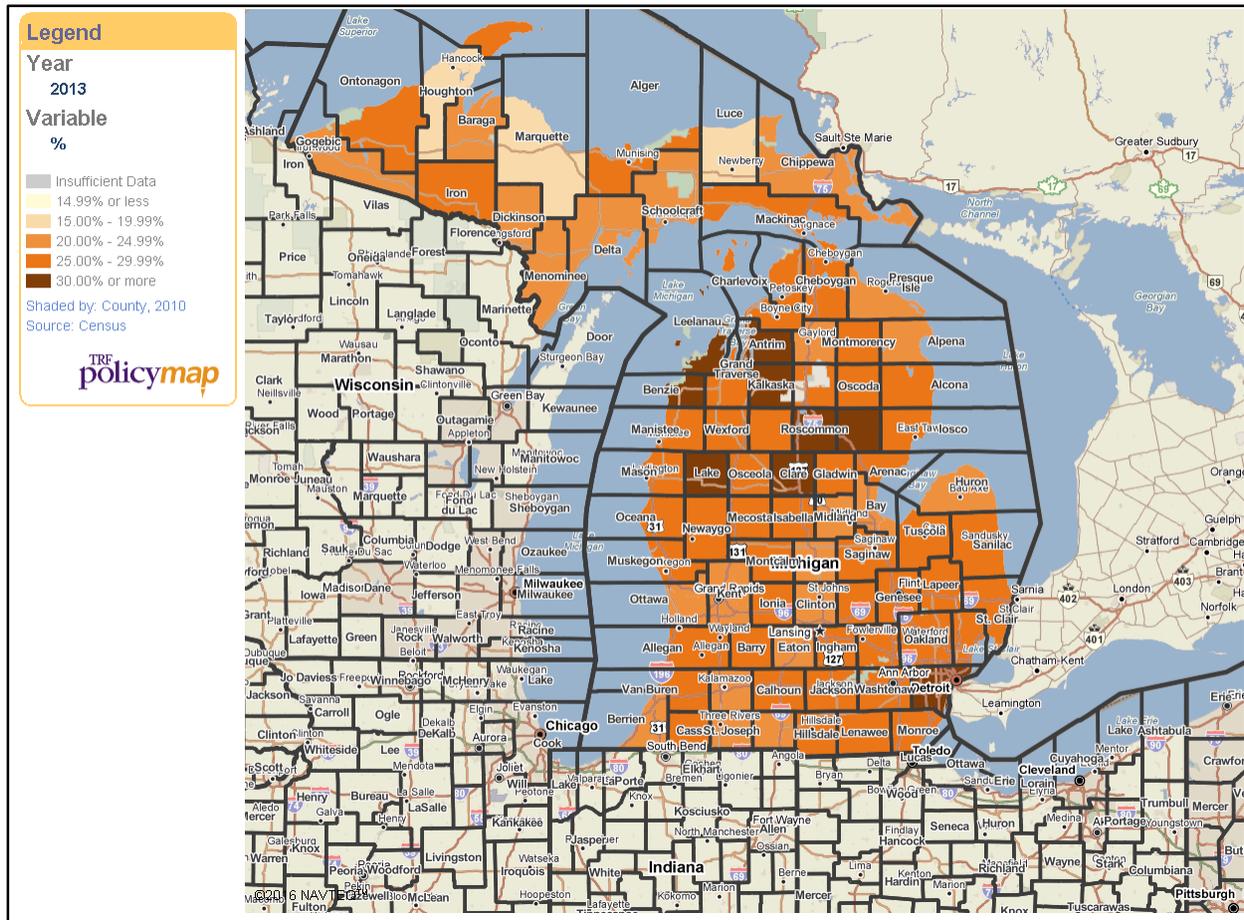
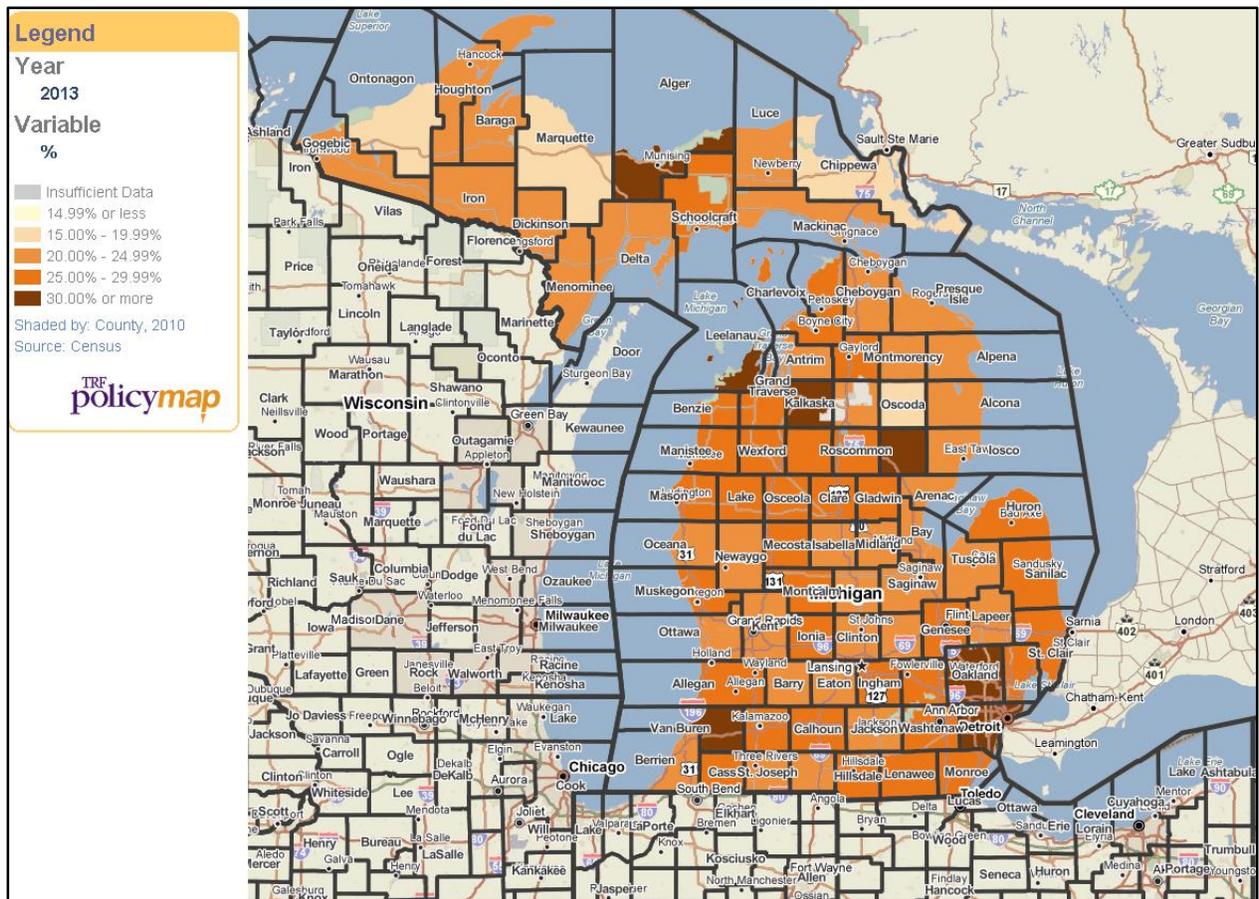


TABLE: Monthly Owner Costs as a Percentage of Household Income		
	2010-2014 ACS (owners without mortgage)	
	Number	%
Less than 10%	351,874	35.8%
10.0 to 14.9%	207,128	21.1%
15.0 to 19.9%	129,123	13.1%
20.0 to 24.9%	79,761	8.1%
25.0 to 29.9%	53,568	5.5%
30.0 to 34.9%	36,691	3.7%
35.0% or more	124,358	12.7%
Not computed	13,377	-
Data Source: 2010-2014 American Community Survey 5 Year Estimates DP04		

The 2010-2014 ACS report specifically identifies housing costs for owner-occupied households without a mortgage. In such case, housing costs are most often attributable to homeowners' insurance premiums and property taxes. As indicated in the table above, 16.4 percent of owner-occupied households, without a mortgage are cost burdened, including 12.7 percent that were considered extremely cost burdened. There is a strong correlation between these cost burdened owner-occupied households and cost burdened seniors who own their homes.

The map below identifies concentrations of cost burdened owners age 65 and older. The lighter shaded areas represent a lower concentration of cost burdened homeowners 65 years or older, and the concentration increases as the shade darkens. In several counties scattered throughout the state, over 30 percent of this population is cost burdened.

MAP: Cost Burdened Homeowners 65 Years Old and Older



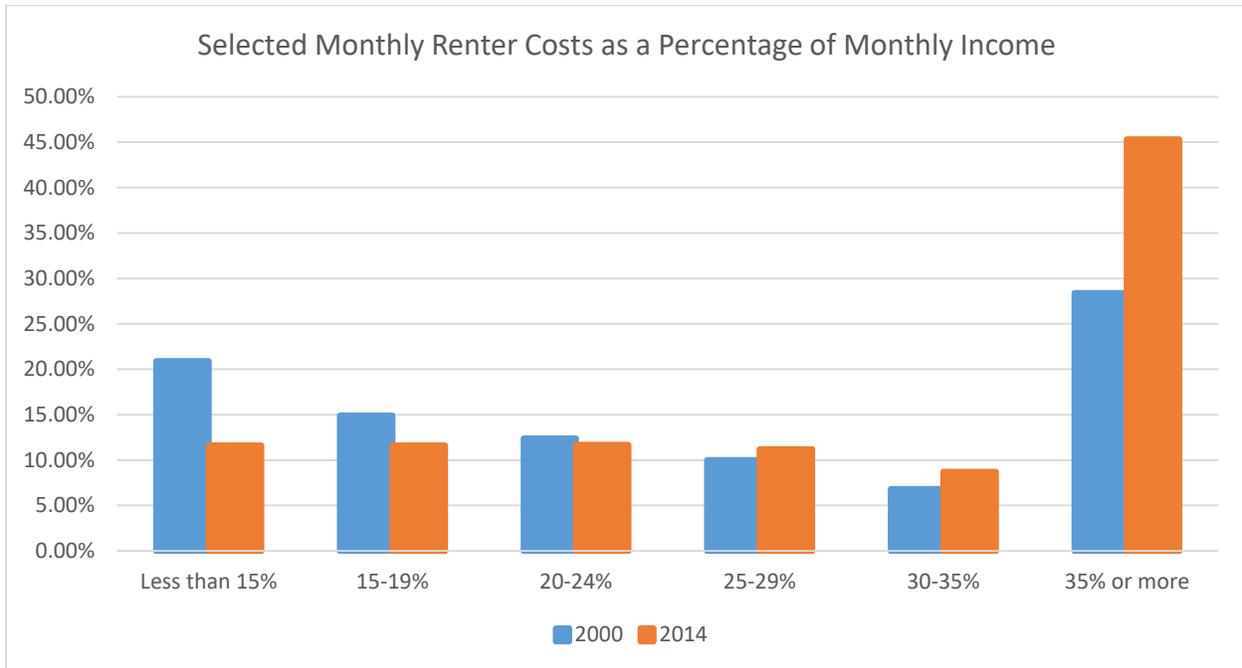
According to HUD’s definition, a renter is considered cost burdened if they pay 30 percent or more of their income towards housing costs. In 2000, 35.1 percent of all renters were considered cost burdened including 28.4 percent that were paying over 35 percent of their income towards housing costs. As of the 2014 calculations, over half (54%) of all renters, paying rent, were cost burdened including 45.3 percent that were paying over 35 percent of their income to housing costs – a significant rise since 2000.

Again, at least some of the significant increase can be attributed to the change in the way the data is presented, but that should not lessen the significance of such a high percentage of renter households facing extreme cost related burdens. When renter households face these extreme cost burdens they are less likely to be able to afford other living expenses such as food and medical care let alone save money towards becoming homeowners and they are more likely to experience poverty conditions.

TABLE: Selected Monthly Renter Costs as a Percentage of Household Income¹⁸				
	2000		2010-2014 ACS	
	(all renters)		(occupied units paying rent)	
	Number	%*	Number	%*
Less than 15%	203,605	20.9%	115,550	11.6%
15 to 19%	144,994	14.9%	115,597	11.6%
20 to 24%	120,980	12.4%	117,432	11.7%
25 to 29%	97,918	10.0%	111,533	11.2%
30 to 35%	66,101	6.8%	86,686	8.7%
35% or more	277,644	28.4%	453,118	45.3%
Not computed	65,071	6.7%	89,882	-

Data Source: 2000 Census DP-4, 2010-2014 American Community Survey 5 Year Estimates DP04
 *Note that census methodology changes mean the percentages in the 2010-2014 ACS represent the percent of units computed while in 2000 the percentages were of all units, including those for which a computation was not made.

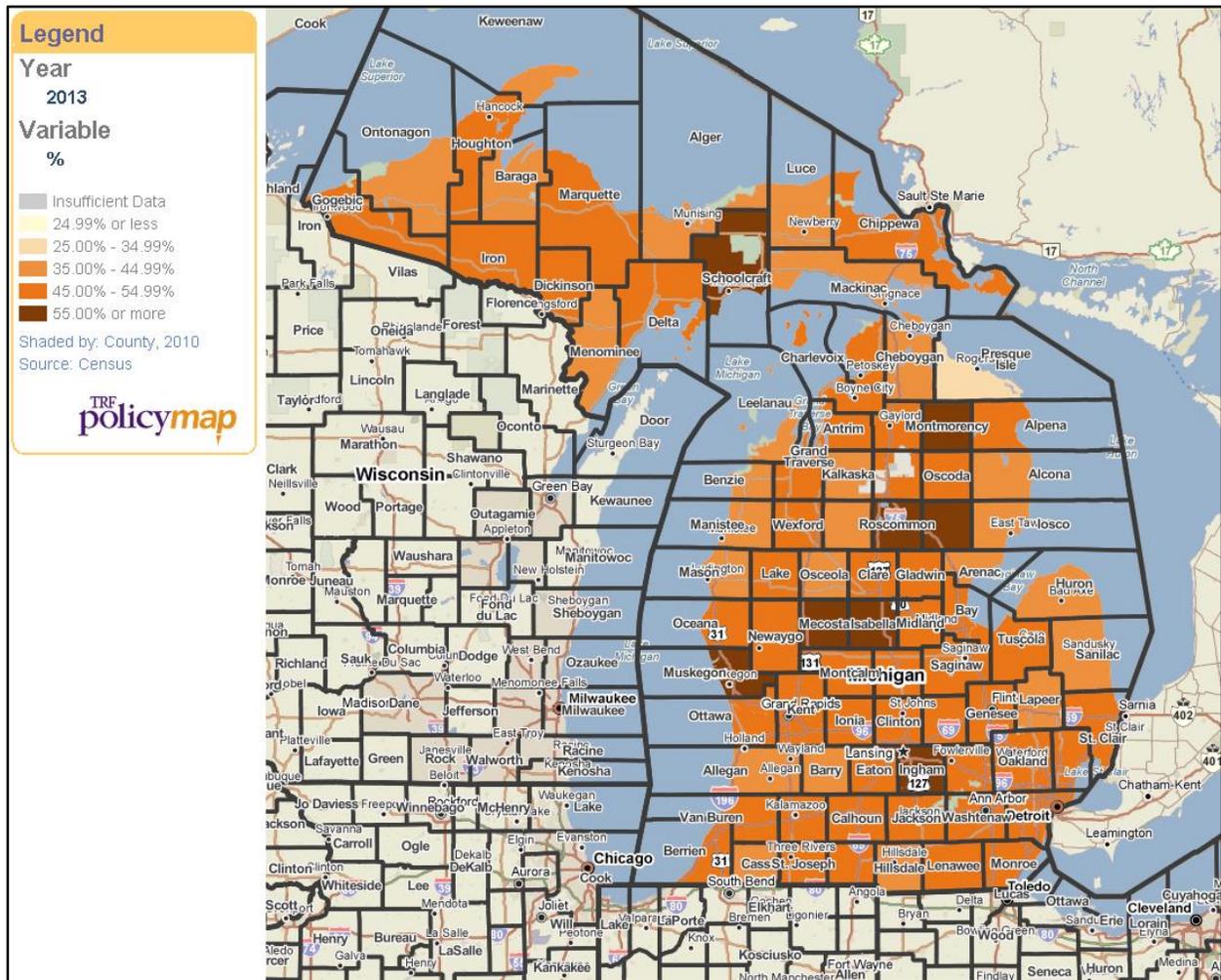
¹⁸ Note: the 2000 Census includes all renters, even those not paying rent and those where calculations could not be made, in the percentages for each income range. However, the 2010-2014 ACS only includes occupied units paying rent, where the calculations could be made, in the percentages for each income range. Therefore, some of the increase between the 2000 Census and the 2010-2014 ACS can be attributed to the change in the way the Census Bureau reports these figures.



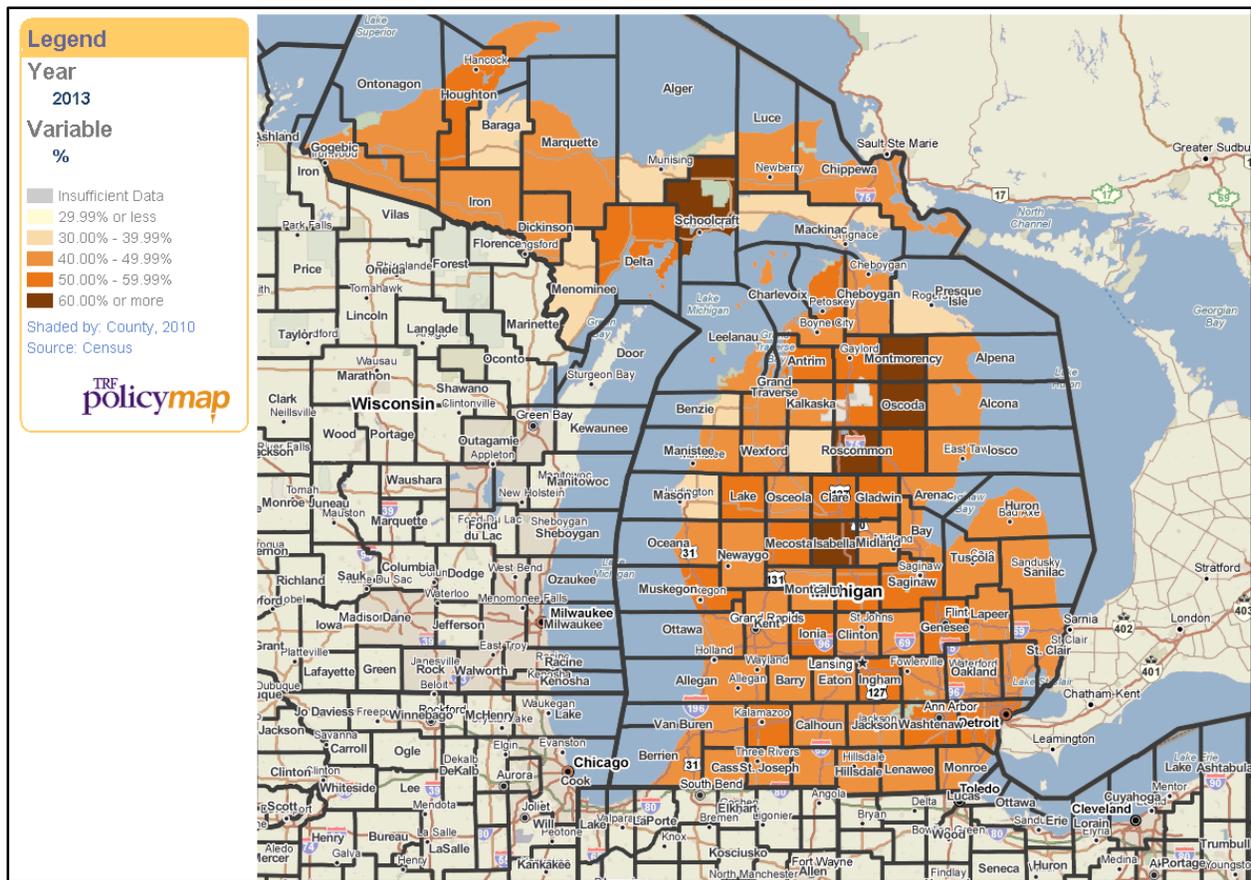
The next two maps detail the concentration of cost burdened renter households. The first map looks at cost renters as a whole, and the second map shows the concentration of cost burdened renters age 65 and older. For both maps, the lighter shades indicate a lower concentration of cost burdened renters and the concentration increases as the shade darkens. There are few counties in the entire state in which less than 40 percent of all renters are cost burdened, and the central portion of the state had the highest concentration of cost burdened renters.

Although 54% of renter households in Michigan were cost burdened in 2013, the distribution of these households varied widely throughout the state. Some counties saw a very high number of cost burdened households while others saw a lower percentage. Among the counties, Roscommon County (67.1%), Schoolcraft County (66.7%), and Isabella County (66.7%) saw the highest proportion of renter households 65 and older that were cost burdened, while at the same time Mackinac County (41.5%) and Baraga County (42.9%) had the lowest number of renter households 65 and older that were cost burdened.

MAP: Cost Burdened Renters



MAP: Cost Burdened Renters 65 Years Old and Older



IV. Private Sector Analysis and Impediments

Lending Practices

An analysis of lending practices is possible through an examination of data gathered from lending institutions in compliance with the Home Mortgage Disclosure Act (HMDA). The HMDA was enacted by Congress in 1975 and is implemented by the Federal Reserve Board as Regulation C. The intent of the Act is to provide the public with information related to financial institution lending practices and to aid public officials in targeting public capital investments to attract additional private sector investments.

Since enactment of the HMDA in 1975, lending institutions have been required to collect and publicly disclose data regarding applicants including: location of the loan (by Census tract, County, and MSA); income, race and gender of the borrower; the number and dollar amount of each loan; property type; loan type; loan purpose; whether the property is owner-occupied; and the action taken for each application. If the application was denied, inclusion of the reason(s) for denial are optional for institutions not regulated by the Office of the Comptroller of the Currency, such as state-chartered banks, though the majority of denial reasons are reported. Property types examined within HMDA reporting include one-to-four family units, manufactured housing, and multi-family developments.

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

It is recommended that the analysis of HMDA data be tempered by the knowledge that no one characteristic can be considered in isolation, but each must be considered in light of other factors. For instance, while it is possible to develop conclusions simply on the basis of race data, it is more accurate when all possible factors are considered, particularly in relation to loan denials and loan pricing. According to the Federal Financial Institutions Examination Council (FFIEC), “with few exceptions,

controlling for borrower-related factors reduces the differences among racial and ethnic groups.” Borrower-related factors include income, loan amount, lender, and other relevant information included in the HMDA data. Further, the FFIEC cautions that the information in the HMDA data, even when controlled for borrower-related factors and the lender, “is insufficient to account fully for racial or ethnic differences in the incidence of higher-priced lending.” The FFIEC suggests that a more thorough analysis of the differences may require additional details from sources other than HMDA about factors including the specific credit circumstances of each borrower, the specific loan products that they are seeking, and the business practices of the institutions that they approach for credit.

The following analysis is provided for the State of Michigan, summarizing 2014 HMDA data (the most recent year for which data are available), and data between 2007 and 2014 where applicable. Where specific details are included in the HMDA records, a summary is provided below for loan denials including information regarding the purpose of the loan application, race of the applicant and the primary reason for denial. For the purposes of analysis, this report will focus only on the information available and will not make assumptions regarding data that is not available or was not provided as part of the mortgage application or in the HMDA reporting process.

2014 State Overview

In 2014, Michigan residents applied for roughly 248,144 home loans to purchase, refinance, or make home improvements for a single family home - not including manufactured homes. Of those applications, nearly 160,000 (64%) were approved and originated. Of the remaining 88,000 applications approximately 46,000 (19%) of all applications were denied for reasons identified below. Also, while many loan applications are denied for more than one reason, HMDA data reflects only the primary reason for the denial of each loan. The balance of the 42,000 applications that were neither originated nor denied were closed for one reason or another including a) the loan was approved but not accepted by the borrower, b) the application was closed because of incomplete information or inactivity by the borrower, or c) in many instances the application may have been withdrawn by the applicant.

TABLE: Disposition of Application by Loan Type and Purpose, 2014				
Single Family Homes (excluding manufactured homes)				
	Loan Type	Home Purchase	Refinance	Home Improvement
Total Applications	Conventional	72,501	100,202	7,375
	FHA	28,994	14,721	416
	VA	6,606	8,023	235
	FSA/RHS	8,785	285	1
Loans Originated	Conventional	54,544	58,823	3,936
	FHA	20,512	7023	100
	VA	4,752	3,748	96
	FSA/RHS	6,300	139	0
Loans Approved but not accepted	Conventional	2,023	3,239	278
	FHA	698	393	79
	VA	135	170	31
	FSA/RHS	279	10	0
Applications Denied	Conventional	7,394	22,533	2,262
	FHA	4,661	4,499	139
	VA	981	2,316	68
	FSA/RHS	1,177	54	1
Applications Withdrawn	Conventional	6,299	10,313	604
	FHA	2,407	1978	76
	VA	614	1,116	39
	FSA/RHS	774	68	0
Files Closed for Incompleteness	Conventional	2,240	5,294	295
	FHA	711	828	22
	VA	123	673	1
	FSA/RHS	234	14	0
Source: 2014 HMDA				

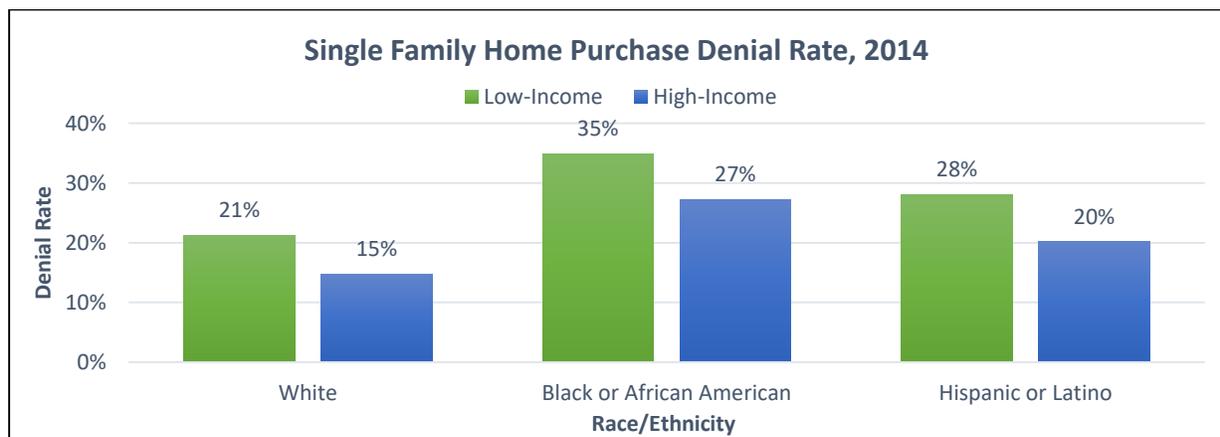
Of the home purchase loans for single-family homes that were originated in 2014, (86,108 loans originated) approximately 63 percent of these originations were provided by conventional lenders. The remaining 37 percent were provided by federally-backed sources including the FHA, VA and FSA/RHS

(Rural Housing Service). The VA and RHS lenders had an application/approval ratio of 58 percent and 71 percent respectively. Conventional lenders originated home purchase loans at a rate of 65% of all applications while 71 percent of the FHA home purchase loan applications resulted in origination.

A further examination of the 46,085 denials indicates that just over 29,400 or 64 percent of all denials were for applicants seeking to refinance existing mortgages for owner-occupied, primary residences. The number one reason for denial of refinance applications¹⁹ was lack of collateral (28% of refinancing denials) followed closely by credit history (24% of refinancing denials). Typically, homeowners seeking to refinance their existing home mortgage are able to use their home as collateral. When the denial reason given for a refinance is a lack of collateral, this often indicates the home is worth less than the existing mortgage and, therefore, refinancing is not an option – these homes are commonly referred to as “under-water” or the borrowers are “upside-down” in their mortgage.

The percentage of loan application denials for traditional home purchase loans for one-to-four family housing in the state varies significantly among Whites, Blacks, and Hispanics. In 2014, Blacks were more than twice as likely to be denied for conventional single-family home purchases as Whites, with respective denial rates of 20 percent and 9 percent. Hispanics were denied at a rate that falls between the other two, at 14 percent.

Additionally, a closer look at home purchase denial rates by race/ethnicity and income group within Michigan, shown below, demonstrates that high-income Blacks (having greater than 120% of Area Median Income) were more likely to be denied for a single family home purchase, at 27 percent, than low-income Whites (having 80% or less of Area Median Income), at 21 percent. Low-income Hispanics were denied at a rate of 28 percent, slightly higher than high-income Blacks. Additionally, high-income Hispanics were denied at a rate similar to low-income Whites, at 20 percent.



Upon a review of denial reasons for federally supported loan products, African Americans or Blacks were denied primarily because of debt-to-income ratios and poor credit, each at approximately 25 percent of all denials. The top denial reasons for Whites for federally supported loan products were credit history (24%) followed closely by lack of collateral (23%) and debt-to-income ratio (22%). Top denials reason for

¹⁹ Please note, the loan disposition information is provided for only single-family homes. However, the HMDA data only provides reasons for single-family loan applications including manufactured homes.

Hispanics applying for federally supported loan products were credit history (28%) and lack of collateral (23%). Reviewing the denial reasons provided by conventional lenders shows that as of 2014 the top denial reasons for Blacks and Hispanics was credit history while for Whites it was lack of collateral. The difference in loan denial percentages for federally supported loan products is not significant across races with percentages generally falling between 22 and 28 percent for the top categories of collateral, credit history, and debt to income ratio across races and ethnicities. A significant difference appears, however, when looking at denials based on credit history by conventional lenders. As noted in the chart below, African Americans are about 50 percent more likely to be denied for credit reasons than Whites in the conventional loan market- 32 percent for African Americans and just 21 percent for Whites. This is an area that may need further investigation to understand why African Americans are being denied at higher rates for credit history in the conventional market, particularly when the spread is not as great for federally supported loan products.

TABLE: Single Family Home Purchase, Denials by Race, Ethnicity & by Reason

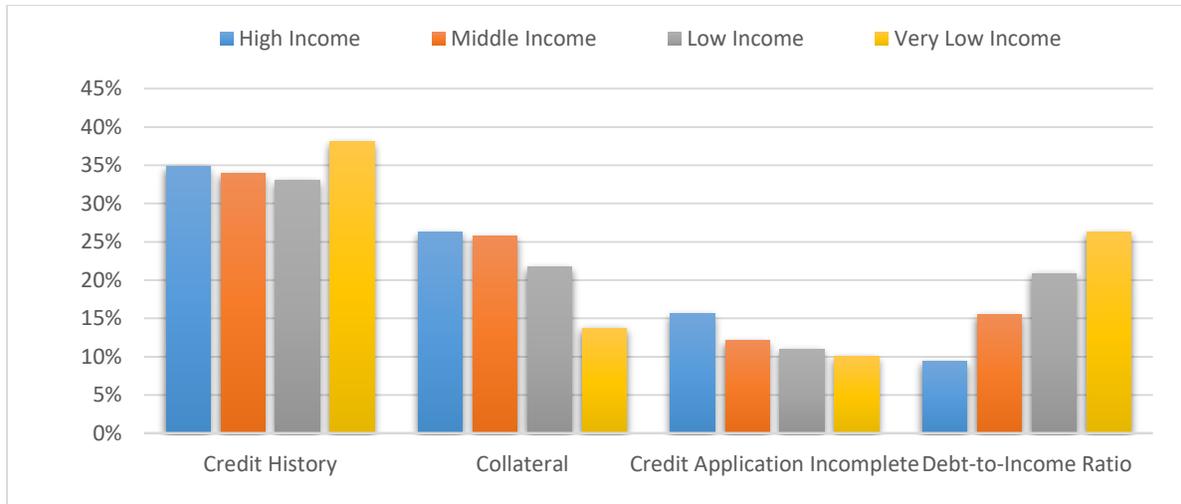
Race/Ethnicity	Primary Reason for Denial	% of Conventional Denials	% of Federally Supported Denials
White	Collateral	30%	23%
	Application Incomplete	16%	13%
	Credit History	21%	24%
	Debt to Income Ratio	20%	22%
	Employment History	2%	3%
	Insufficient Cash	3%	4%
	Mortgage Insurance Denied	0%	0%
	Unverifiable Information	2%	2%
	Other	5%	9%
African American/Black	Collateral	25%	21%
	Application Incomplete	10%	14%
	Credit History	32%	25%
	Debt to Income Ratio	20%	25%
	Employment History	2%	1%
	Insufficient Cash	4%	4%
	Mortgage Insurance Denied	0%	0%
	Unverifiable Information	1%	3%
	Other	5%	7%
Hispanic or Latino	Collateral	24%	23%
	Application Incomplete	12%	9%
	Credit History	27%	28%
	Debt to Income Ratio	20%	20%
	Employment History	2%	5%
	Insufficient Cash	5%	4%
	Mortgage Insurance Denied	1%	0%
	Unverifiable Information	2%	3%
	Other	7%	7%

Source: 2014 HMDA

Minority Application Denial Reasons by Income Group

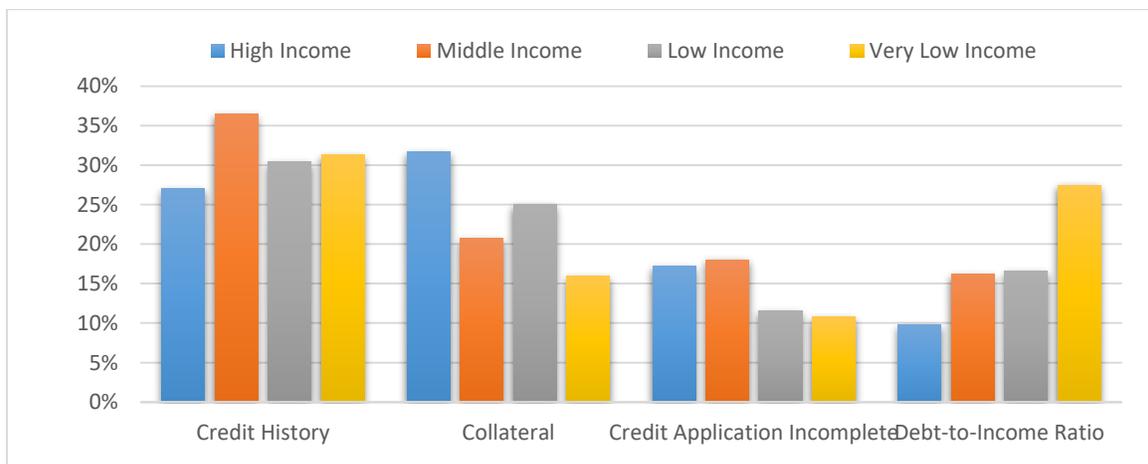
As of 2014, the leading denial reason for Black applications across all income groups was credit history, representing over 30 percent of denials for each income category. Relative to lower income groups, High Income Blacks were more likely to be denied for lack of collateral, while debt-to-income ratio was a more common denial reason for lower income Black applicants.

Black Denial Reasons by Income Group, 2014



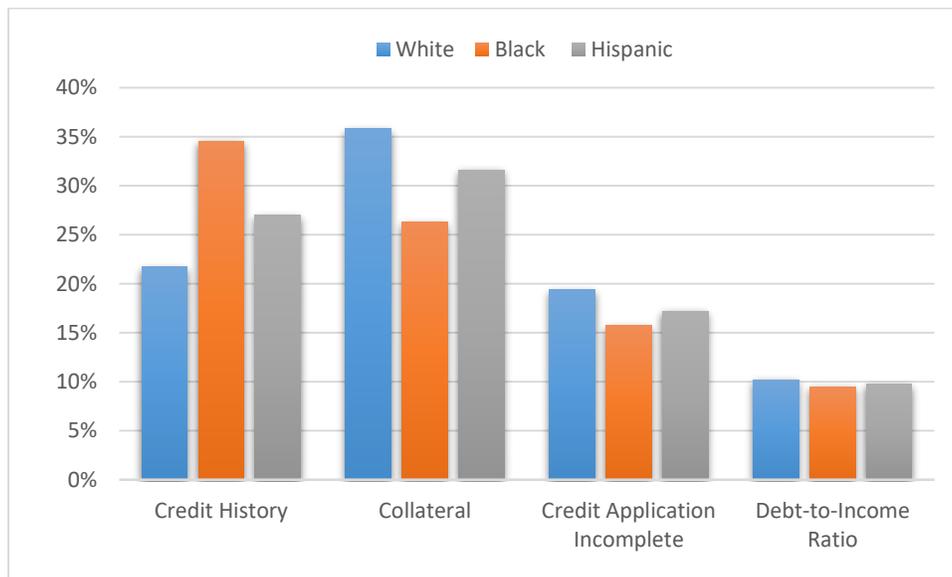
Among Hispanic applicants, those within the High Income category were most likely to be denied for lack of collateral, while credit history was the most frequent denial reason for all other income groups, particularly Middle Income applicants (over 36%). Debt-to-income ratio was disproportionately more likely to be a denial reason for Very Low Income applicants.

Hispanic Denial Reasons by Income Group, 2014

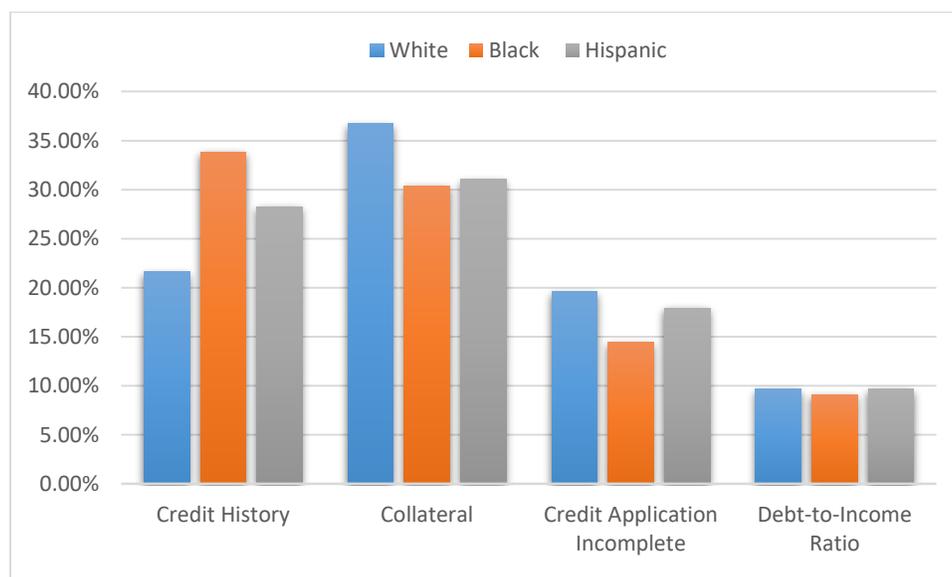


Comparing High Income applicants by race/ethnicity, High Income Whites and Hispanics were more likely to be denied for lack of collateral while High Income Blacks were more likely to be denied for credit history. Though the first chart below represents all loan application purposes, refinance applications exhibit a similar pattern by denial reason, shown in the second chart. However, denials for refinance applications occurred at a higher rate for Blacks (35.6%) and Hispanics (30.7%) compared with Whites (22.6%) – a pattern that holds true across all income groups.

Denial Reasons for High Income Applicants by Race/Ethnicity, All Loan Applications, 2014



Denial Reasons for High Income Applicants by Race/Ethnicity, Refinance Applications, 2014



Similar to home purchase loan applications, Low Income White applicants were less likely to be denied than High Income Blacks for refinance loans. Additionally, Very Low Income Whites had only a slightly higher rate of denial (33.7%) than High Income Black applicants (32.6%).

	High Income	Middle Income	Low Income	Very Low Income	Overall
White	18.4%	22.8%	26.0%	33.7%	22.6%
Black or African American	32.6%	37.9%	39.5%	48.5%	35.6%
Hispanic or Latino	25.8%	31.4%	33.7%	43.1%	30.7%

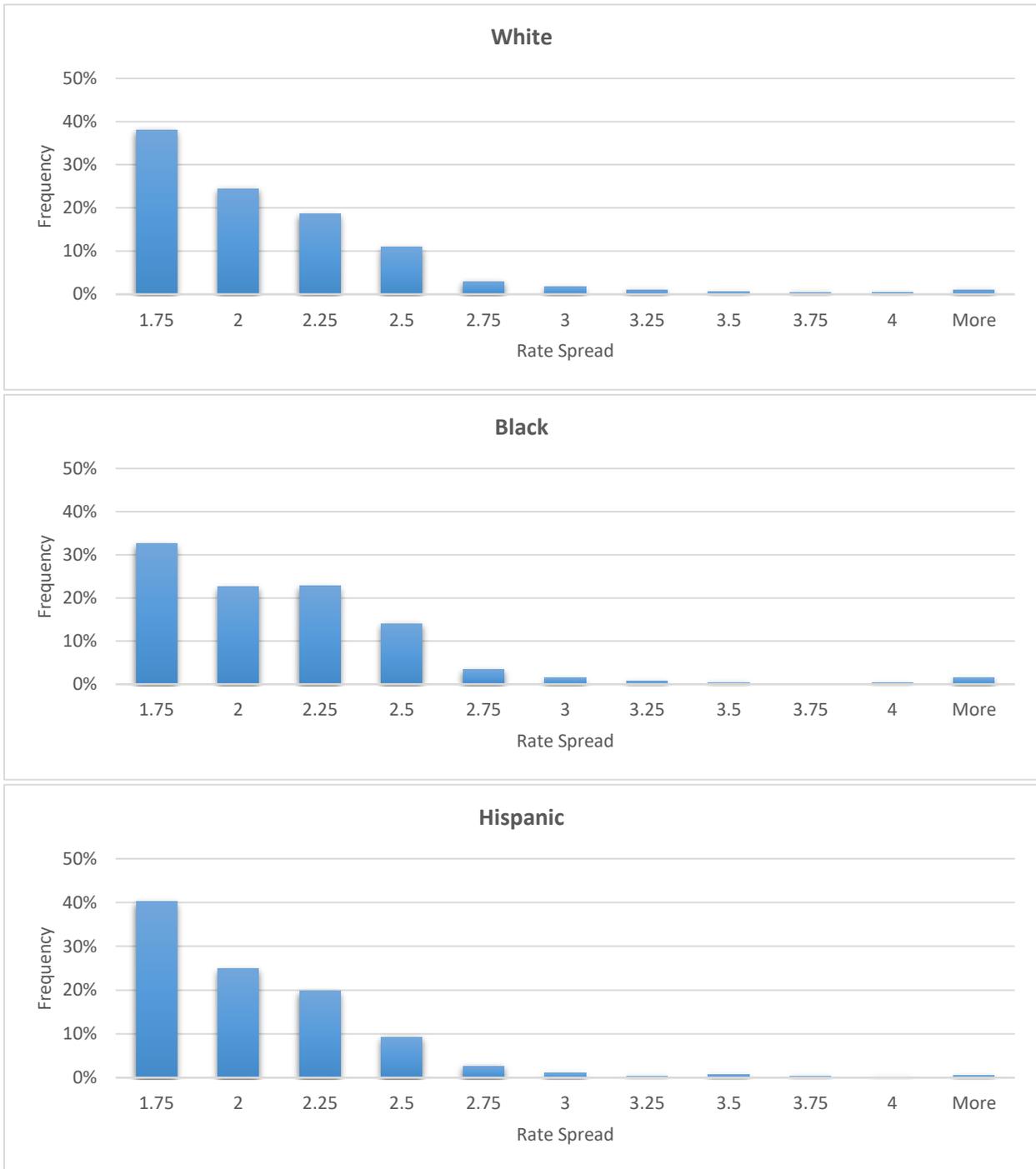
Subprime Distributions

The charts below illustrate the distribution of subprime rate spreads among White, Black, and Hispanic loans. The rate spread refers to the difference between the annual percentage rate of the originated loan and applicable prime offer rate, and is included in HMDA for rate spreads of 1.5 or greater. For example, the majority of subprime mortgage originations for White, Black, and Hispanic applicants were characterized by rate spreads less than or equal to 2 percent (shown in the tables below). Consistent with tighter lending regulations after the financial crisis, there are no major differences by race/ethnicity in the interest rate distribution of subprime lending in Michigan.

However, while rate spread distributions are roughly similar, loan originations by White applicants are much less likely to be subprime, at fewer than 10 percent, relative to Blacks (26.5%) and Hispanics (16.9%).

	% of Subprime Originations
White	9.8%
Black or African American	26.5%
Hispanic or Latino	16.9%

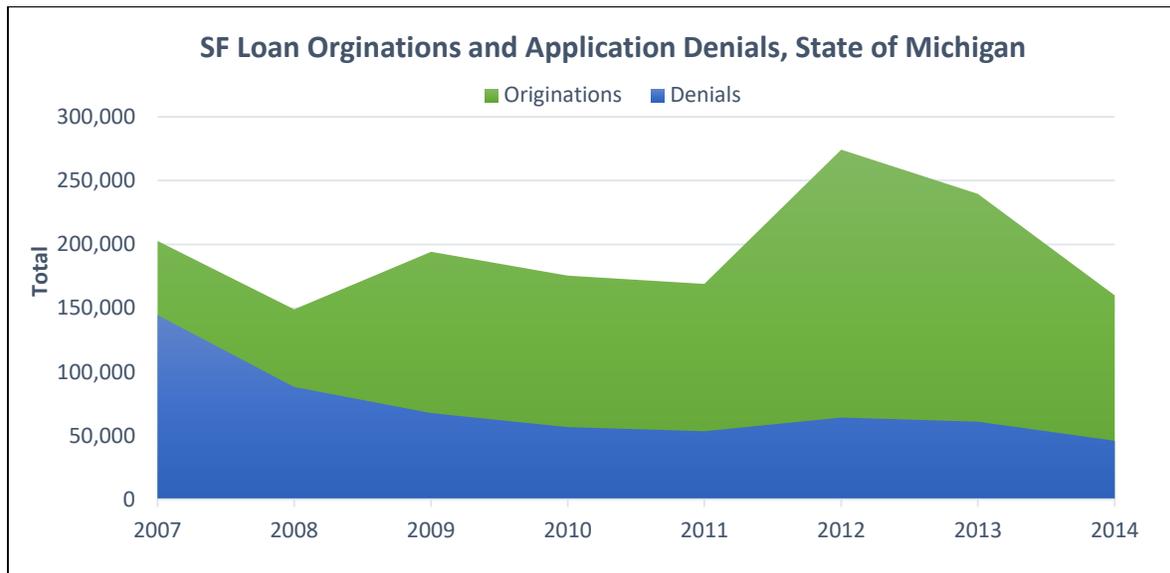
Distribution of Subprime Rate Spreads, 2014



Michigan's Single Family Lending Market, 2007-2014

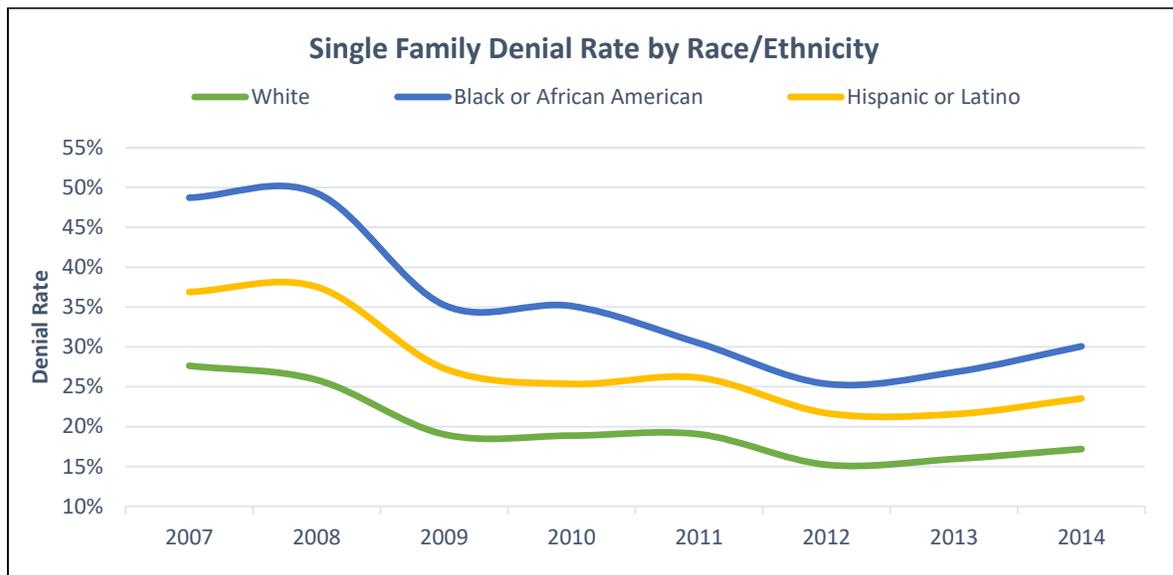
The following section will examine HMDA data over the time period 2007-2014, for the State of Michigan as a whole and for various metropolitan regions where applicable.

Highlighted below, the number of single-family loan originations declined within Michigan between 2007 and 2014, from over 202,000 to just under 160,000 (a decrease of 21%). While the 2014 level of originations was below that of 2007, the years of 2012 and 2013 saw relatively high numbers of originations compared to the other years examined. In contrast the fluctuations in total originations, the number of denials within the state demonstrated a relatively more consistent decline between 2007 and 2014. Total denials fell by over 68 percent, from approximately 144,500 to 46,000 during the same time period. Relatedly, of the total single-family loan originations and denials within Michigan, the share of loan denials fell from 42 percent in 2007 to 22 percent in 2014.

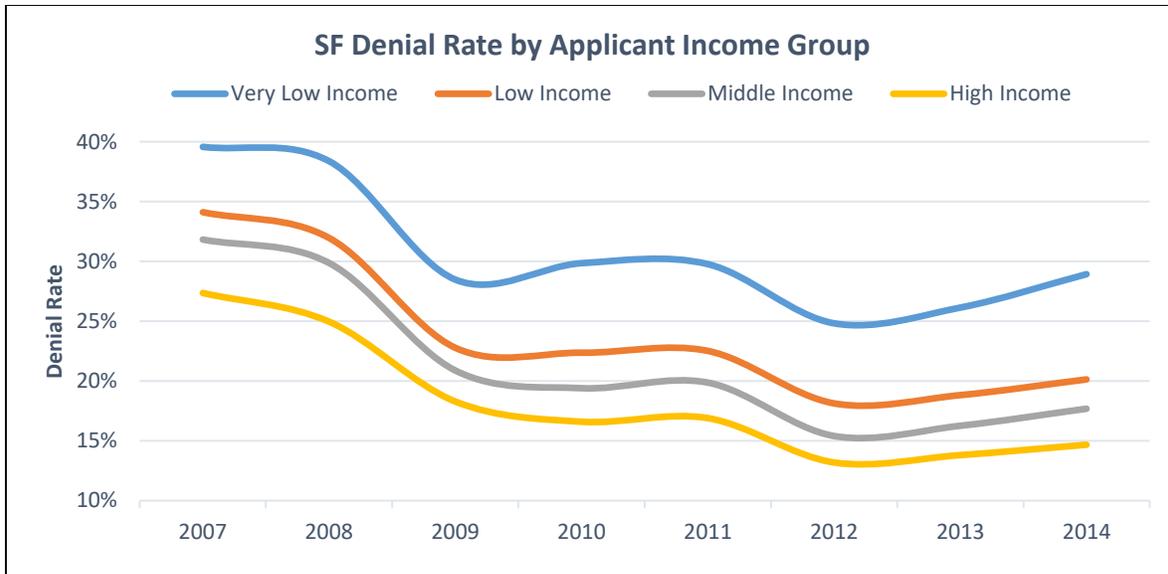


Income, Race, and Single Family Loan Denials in Michigan

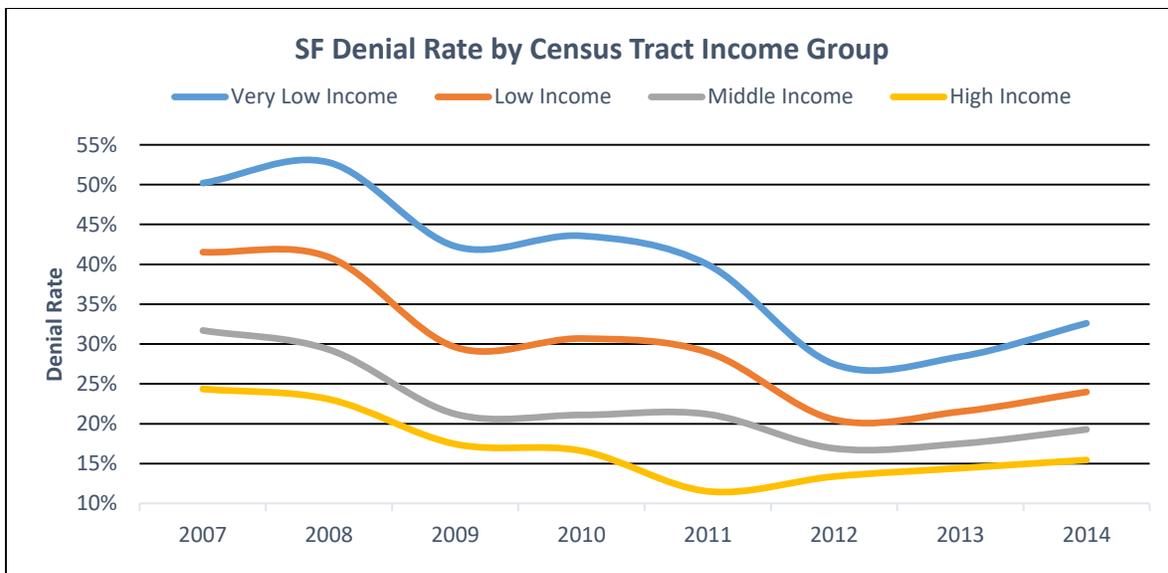
Denial rates for single-family loans in Michigan vary by race and ethnicity. The chart below shows that between 2007 and 2014, Blacks were consistently denied at the highest rate relative to Whites and Hispanics, and were the only group for which the single-family loan denial rate reached approximately 50 percent, as was the case in 2008. Though the Black denial rate has trended downward since 2008, similar to Whites and Hispanics, a mild uptick occurred between 2012 and 2014. Though racial disparities in the denial rate still clearly exist, the gap between the rates of the highest denied group (Blacks) and the lowest denied group (Whites) narrowed between 2007 and 2014.



A view of single-family denial rates by applicant income group within Michigan, highlighted below, shows the expected outcome of higher income groups experiencing lower denial rates than lower income groups. Between 2007 and 2014, applicants in the Very Low Income category (50% or less of Area Median Income), were consistently more likely to be denied for a single-family loan than any other income group. Low Income applicants (between 50% and 80% of Area Median Income) were denied at the second highest rate, though followed a more pronounced downward trajectory between 2007 and 2014 relative to Very Low Income applicants. Middle Income applicants (80 to 120% of Area Median Income), in a manner similar to Low Income and High Income applicants, saw a relatively strong drop in denial rates between 2007 and 2012, from 32 percent to 15 percent, though the denial rate has since trended mildly upward to 18 percent as of 2014. The lowest denial rate in every year examined belonged to the High Income group (greater than 120% of Area Median Income). Consistent with an overall decline in the single-family denial rate, every income group's denial rate fell between 2007 and 2014, though since 2012, the denial rates for every income group increased between 2012 and 2014.

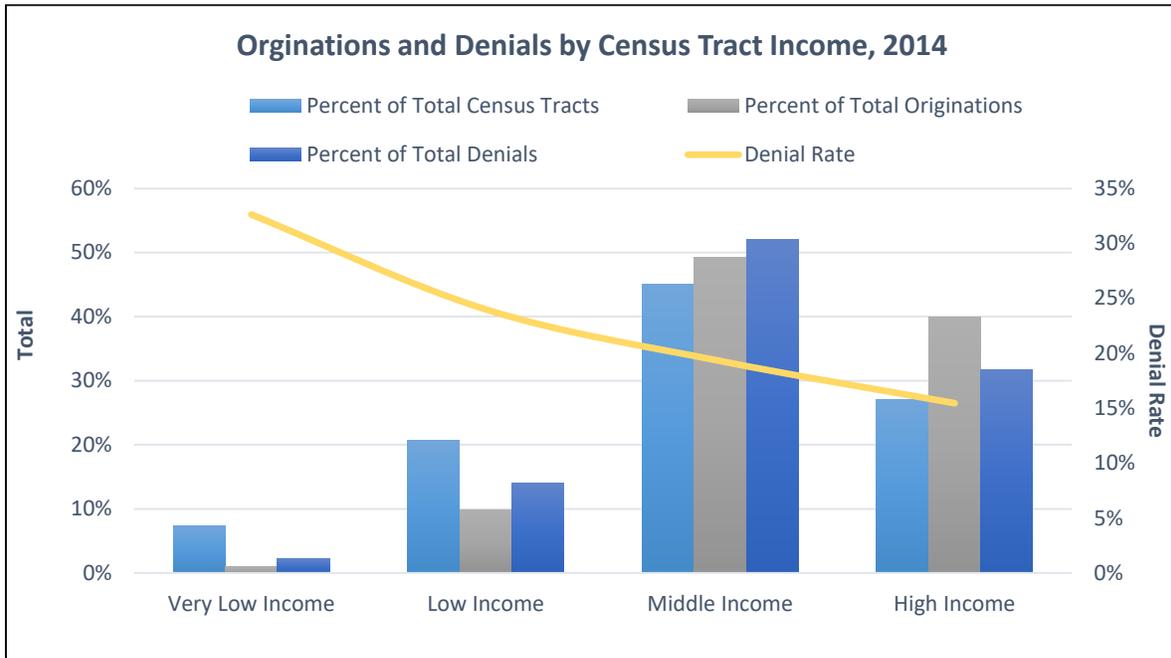


In addition to the income of the applicant, the median income of the property’s Census tract also reveals decreasing denial rates as tract income group rises. Further, denial rates for all tract income groups have increased since 2012.



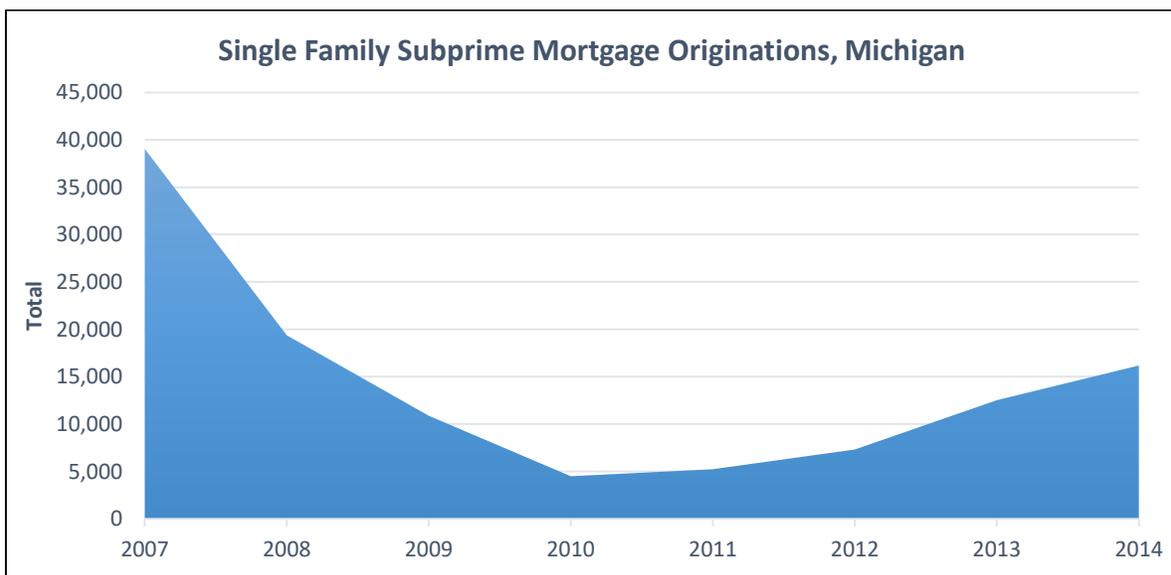
Though Very Low Income tracts represent 7 percent of all Census tracts within Michigan, they are represented by less than 1 percent of total originations and 2 percent of total denials as of 2014. Further, loans for single-family properties within these tracts were denied at a rate of 33 percent, higher than any other group. Loan originations within Michigan are disproportionately likely to occur for properties in Middle and High Income tracts. For example, Middle and High Income tracts represent 72 percent of the Michigan County total, but account for over 89 percent of all single-family loan originations throughout

the state in 2014. Together, Low and Very Low Income tracts represent 28 percent of all tracts, but only account for roughly 11 percent of all single-family loan originations during the same year.



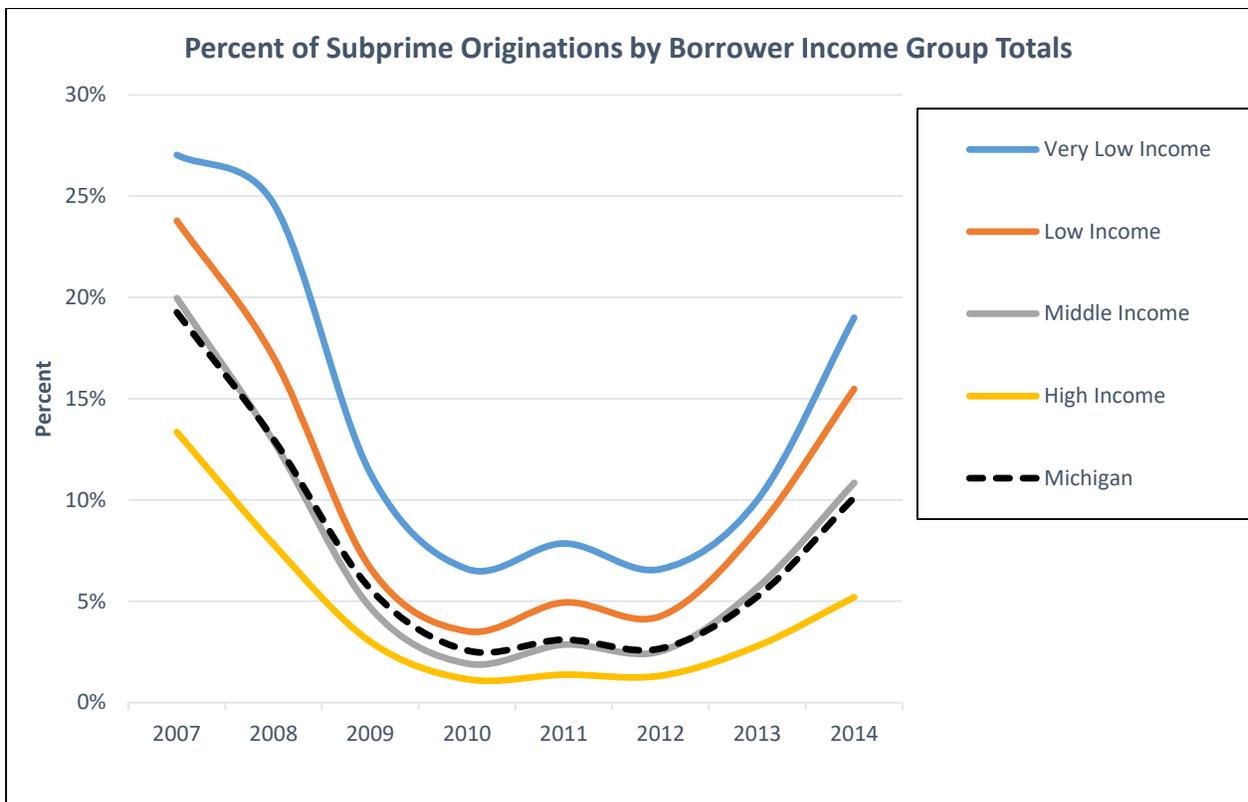
The Subprime Market

Illustrated below, the subprime mortgage market in Michigan has declined significantly since 2007, though it has gradually increased since 2010. The total number of subprime loan originations fell by nearly 60 percent between 2007 and 2014, much higher than the total origination decline of 21 percent.



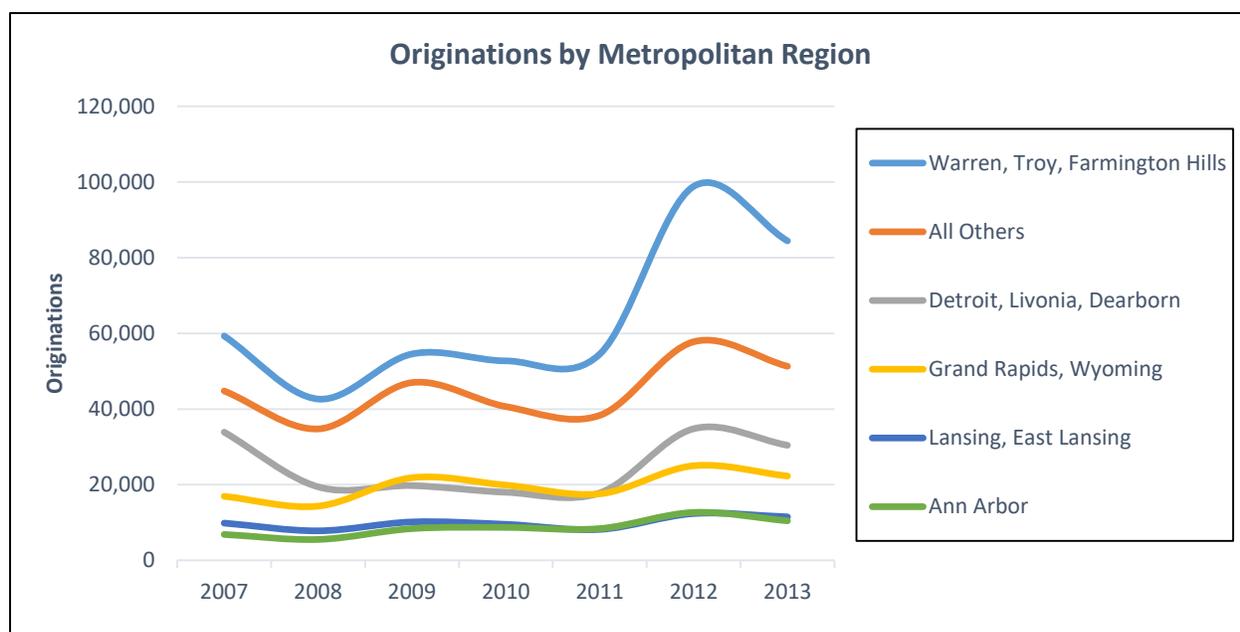
As a percentage of total single-family loan originations, Michigan has seen a significant decrease in subprime originations relative to 2007 levels, shown below. As of 2014, subprime originations were approximately 10 percent of the state's total, down from nearly 20 percent in 2007. Subprime originations as a percent of borrower income group follows a similar pattern, with notable declines occurring between 2007 and 2010. Though all income groups and Michigan as a whole have demonstrated an upward trend in the share of subprime originations since 2012, they remain well below 2007 levels as of 2014 despite recent acceleration.

Michigan's subprime origination trends are consistent with the tightened credit conditions and heightened home lending standards that have taken place in the aftermath of the financial crisis and Great Recession.



Metropolitan Variation in Michigan's Single Family Lending Market

Within the State of Michigan, there is a substantial amount of geographic variation in mortgage market outcomes by metropolitan region. For example, in every year examined, the Warren, Troy, Farmington Hills MSA originated more single family loans than any other Michigan metro by a wide margin. Detroit, Grand Rapids, Lansing, and Ann Arbor finish out the top five metros by total originations, with Detroit being the only top five metro that experienced a decline in total originations between 2007 and 2013 (the most recent year for which MSA data are available). Further, nearly two-thirds of all mortgage originations in 2013 occurred in the Warren (40%), Detroit (15%), or Grand Rapids (11%) metropolitan regions.



In addition to having the highest total, the Warren, Troy, Farmington Hills metro also saw by far the greatest absolute increase in total originations between 2007 and 2013, at over 25,000.

	2013 Originations	Absolute Change (2007-2013)	Percentage Change (2007-2013)
Warren, Troy, Farmington Hills	84,473	25,134	42.4%
Detroit, Livonia, Dearborn	30,458	-3,478	-10.2%
Grand Rapids, Wyoming	22,283	5,363	31.7%
Lansing, East Lansing	11,495	1,646	16.7%
Ann Arbor	10,453	3,580	52.1%

Between 2007 and 2013, every metropolitan region within the State of Michigan experienced a decrease in the single-family denial rate. The metro with the greatest percentage point decrease was Detroit, falling from over 40 percent in 2007 to just over 17 percent in 2013. As of 2013, Ann Arbor was characterized by the lowest denial rate (less than 14 percent), while South Bend had the highest denial rate (over 22 percent) (note that while South Bend is in Indiana, the South Bend-Mishawaka MSA includes Cass County in southwest Michigan).

TABLE: Denial Rates by Metropolitan Region		
	Denial Rate in 2013	Percentage Point Change from 2007
Ann Arbor	13.6%	-11.4%
Holland, Grand Haven	14.1%	-8.4%
Warren, Troy, Farmington Hills	15.2%	-13.7%
Kalamazoo, Portage	15.3%	-11.9%
Grand Rapids, Wyoming	15.9%	-12.0%
Lansing, East Lansing	16.2%	-12.2%
Monroe	16.9%	-13.4%
Detroit, Livonia, Dearborn	17.3%	-23.0%
Flint	17.4%	-18.5%
Battle Creek	17.8%	-14.9%
Bay City	18.1%	-8.3%
Saginaw, Saginaw Township North	18.5%	-15.8%
Muskegon, Norton Shores	19.7%	-13.8%
Jackson	19.8%	-13.0%
Niles, Benton Harbor	20.5%	-7.5%
South Bend, Mishawaka	22.2%	-6.0%

As well as the having lowest denial rate, the Ann Arbor metro is the region in Michigan with the highest loan origination value as of 2013. Of the 16 metropolitan regions in the state, all but Detroit and Saginaw experienced a decline since 2007.

	Average Origination Value in 2013	Nominal Change in Value Since 2007	Percentage Change in Value Since 2007
Ann Arbor	\$196,583	(\$18,241)	-8.5%
Warren, Troy, Farmington Hills	\$170,899	(\$23,269)	-12.0%
Holland, Grand Haven	\$145,593	(\$10,490)	-6.7%
Niles, Benton Harbor	\$141,611	(\$6,313)	-4.3%
Detroit, Livonia, Dearborn	\$141,432	\$2,684	1.9%
Grand Rapids, Wyoming	\$139,580	(\$5,462)	-3.8%
Kalamazoo, Portage	\$138,763	(\$2,185)	-1.6%
South Bend, Mishawaka	\$138,248	(\$732)	-0.5%
Monroe	\$133,148	(\$20,816)	-13.5%
Lansing, East Lansing	\$126,058	(\$13,276)	-9.5%
Flint	\$118,186	(\$5,702)	-4.6%
Jackson	\$116,798	(\$7,636)	-6.1%
Battle Creek	\$109,191	(\$1,102)	-1.0%
Saginaw, Saginaw Township North	\$108,158	\$3,905	3.7%
Muskegon, Norton Shores	\$106,807	(\$1,327)	-1.2%
Bay City	\$94,933	(\$9,259)	-8.9%

V. Regional Overviews



Using “Prosperity Regions” defined and used by the State for various existing housing, economic development, and planning purposes, this section provides a more geographically nuanced view of key demographic data points.

As more fully described in Appendix A, for purposes of these analyses, all CDBG-entitled counties (Kent, Genesee, Macomb, Oakland, and Wayne) were excluded from their respective regions. This also means that no separate analysis of Region 10 was completed since all three counties are CDBG entitlements. Further, in any case where CDBG entitlement cities represented more than 25% of a given county’s population, those cities were removed from the statistical analysis. For example, Lansing and East Lansing

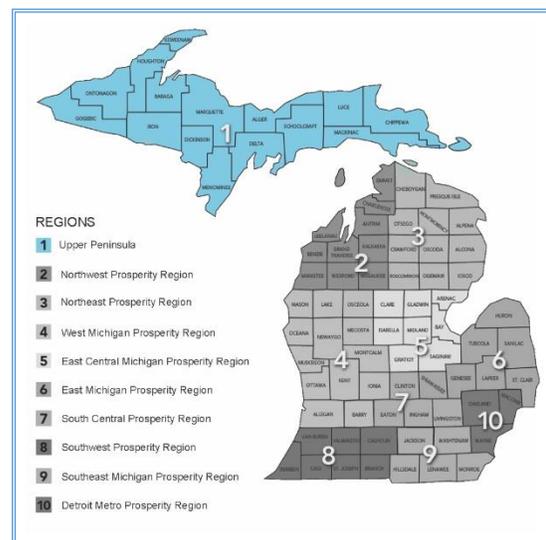
were removed from the Ingham County totals prior to calculating demographic statistics for the balance of the county. In other cases, when an entitled city was less than 25% of the county population, then demographic information for the entire county was included. For example, Holland only represents 12.2% of Ottawa County, so it was not excluded from the county and, therefore, regional calculations.

The goal of this inclusion/exclusion process was to focus on the non-entitled portions of the respective regions. In some cases, this results in statistics that may not immediately “ring true” to readers who are familiar with statistics on a county-wide basis. To a large degree, this, in itself, provides evidence that many potential fair housing concerns relate as much or more to the ease with which individuals can freely choose and access housing across jurisdictional lines (city to suburb) than to issues within a given political subdivision.

Region 1 – Upper Peninsula

Region 1 consists of the following 15 counties: Alger, Baraga, Chippewa, Delta, Dickinson, Gogebic, Houghton, Iron, Keweenaw, Luce, Mackinac, Marquette, Menominee, Ontonagon, and Schoolcraft.

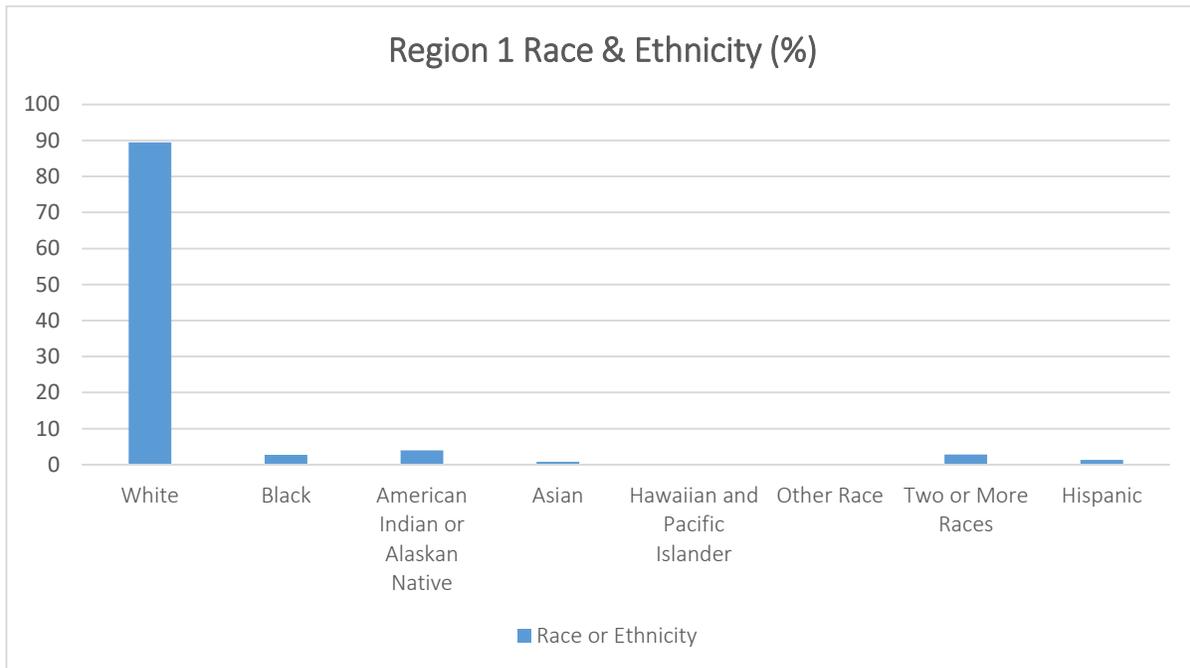
The 15 non-entitlement counties comprising Region 1 experienced a net population decrease of 2.3 percent between 2000 and 2014 – decreasing from a cumulative population of 317,616 to 310,243 (2000 Census, 2010-2014 ACS). However, within that time period, Region 1 saw a slight increase of 0.3 percent from 2009 to 2014. This possibly points to signs of a slight recovery, but this increase is so small as to be within the margin of error



so stagnation is also a likely scenario. A majority of counties in Region 1 experienced a decrease of population over the 14-year time period, while only three counties held on with small growth rates. Ontonagon County saw the sharpest decline in population at 17.5 percent, shrinking from 7,818 in 2000 to 6,448 in 2014. Marquette County, the largest county in Region 1, saw the biggest growth in population at 4.5 percent - rising from 64,634 in 2000 to 67,535 in 2014.

Race and Ethnicity

Region 1 is predominantly White, with the group accounting for 89.5 percent of regional population and all remaining racial groups making up the remaining 10.5 percent. American Indians or Alaskan Natives account for almost 4 percent of the population. Blacks/African Americans account for less than 3 percent and Asians account for less than 1 percent of the population. Persons identifying as Two or More races comprise an additional 3 percent of the regional population. Finally, just over 1 percent of the region identify as ethnically Hispanic.



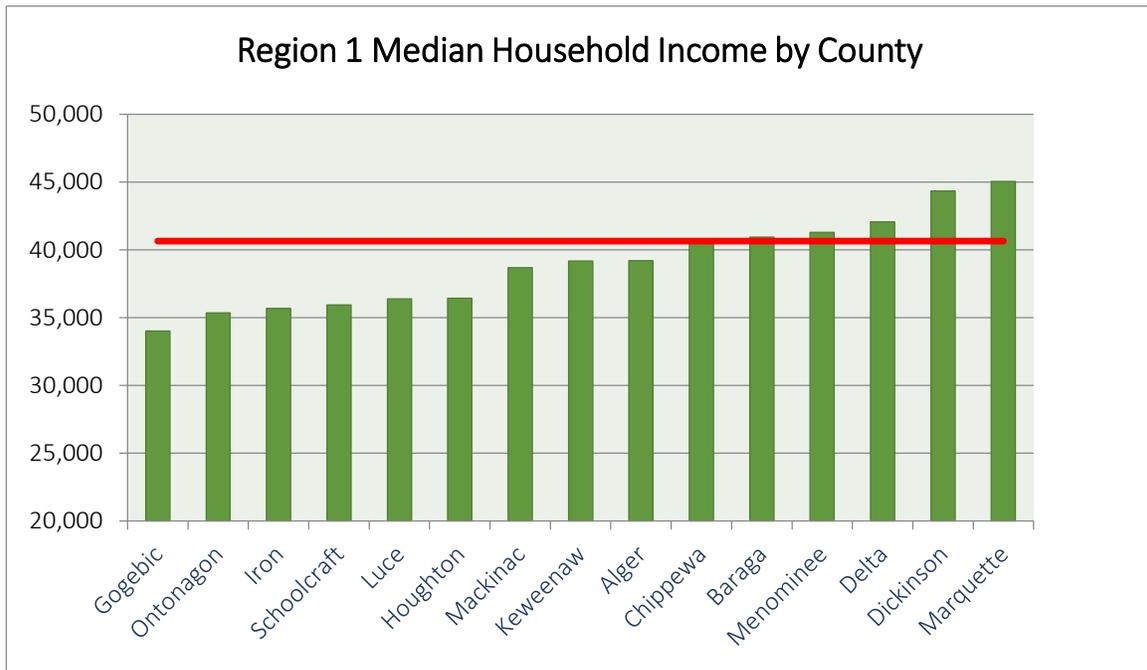
Data Source: 2010-2014 American Community Survey 5-Year Estimates

Age & Disability

Seniors comprised 18.8 percent of Region 1’s population, with a total of 58,189 persons aged 65 and over. Ontonagon County had the highest proportion of seniors at 29.2 percent. Houghton County and Chippewa County had the lowest proportion of seniors at 15.3 percent each (2010-2014 ACS). Approximately 15.5 percent of the regional population had a disability – 48,010 persons. Luce County had the highest disability rate at 25.9 percent and Houghton County had the lowest disability rate at 12.1 percent (2010-2014 ACS).

Median Household Income

The median household income (MHI) in the region was \$40,657, however the MHI varied widely among the counties – with nine of the fifteen counties below the regional MHI. Marquette County had the highest MHI at \$45,066, while Gogebic County had the lowest MHI at \$34,021.



Data Source: 2010-2014 American Community Survey 5-Year Estimates

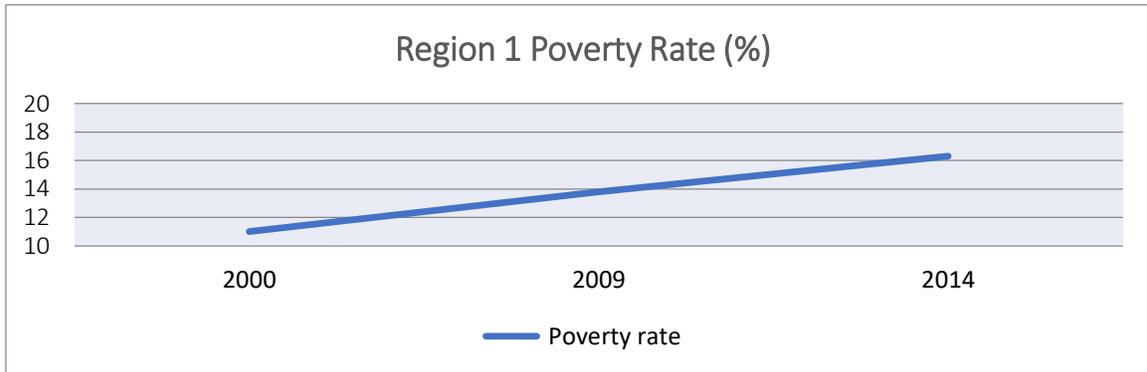
Data Note: The red line represents the regional median household income of \$40,657

Affordability & Housing

HUD defines housing cost burden as when a household spends more than 30 percent of monthly income on housing related costs. Fifty-two percent of renters in Region 1 (13,987 households) were cost burdened according to 2010-2014 ACS estimates. Amongst homeowners, 28.5 percent of owners with a mortgage (14,265 households) and 13.8 percent of owners without a mortgage (6,249 households) were housing cost burdened. Homeowners without mortgages who are cost burdened are often households on fixed incomes (such as the elderly) that pay an inordinate amount of their monthly income on taxes, insurance, and other housing related costs.

Poverty

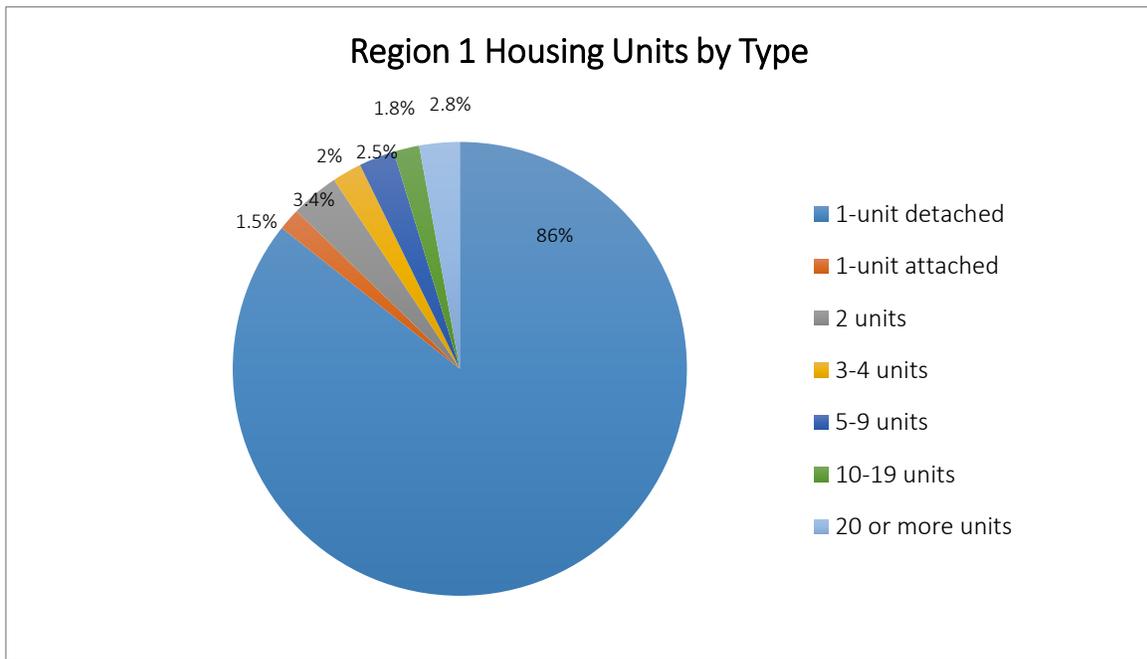
An additional indicator of financial strife is poverty. There were 50,452 persons living below the poverty line in Region 1, according to 2010-2014 ACS estimates – 16.3 percent of the regional population. That represents a 48 percent poverty rate increase from 2000. Dickinson County experienced the lowest poverty rate at 13.4 percent (3,432 persons), and Houghton County experienced the highest poverty rate at 22.2 percent (7,661 persons).



Data Source: Census 2000, 2005-2009 ACS 5-Yr Est., 2010-2014 ACS 5-Year Est.

Housing Stock

There were 184,268 housing units in Region 1 according to 2014 ACS 5-Year Estimates with Marquette County having the highest number of housing units with 34,431 units and Keweenaw County having the least amount with 2,475 units. A 1-unit detached structure was by far the most prominent unit type in the region with 79.5 percent of the units (146,504 units) followed by 2 units with 3.2 percent (5,850 units).



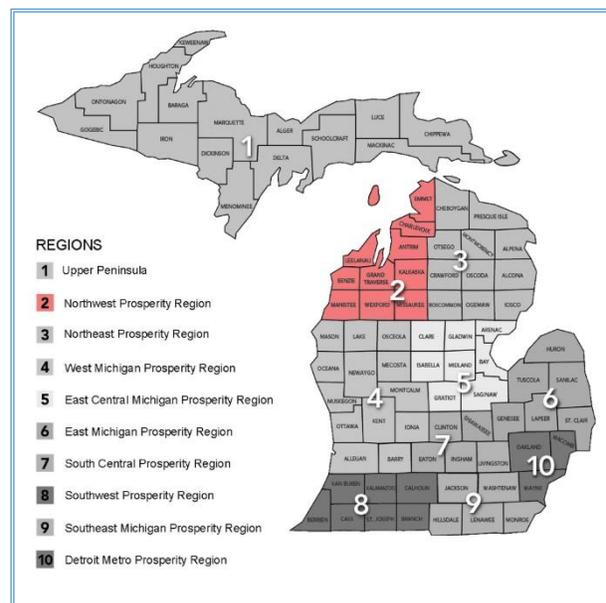
Data Source: 2010-2014 ACS 5-Year Estimates (Chart does not factor in Mobile Homes or Boat/RV/Van)

Region 2 – Northwest Prosperity Region

Region 2 consists of the following 10 counties: Antrim, Benzie, Charlevoix, Emmet, Grand Traverse, Kalkaska, Leelanau, Manistee, Missaukee, and Wexford.

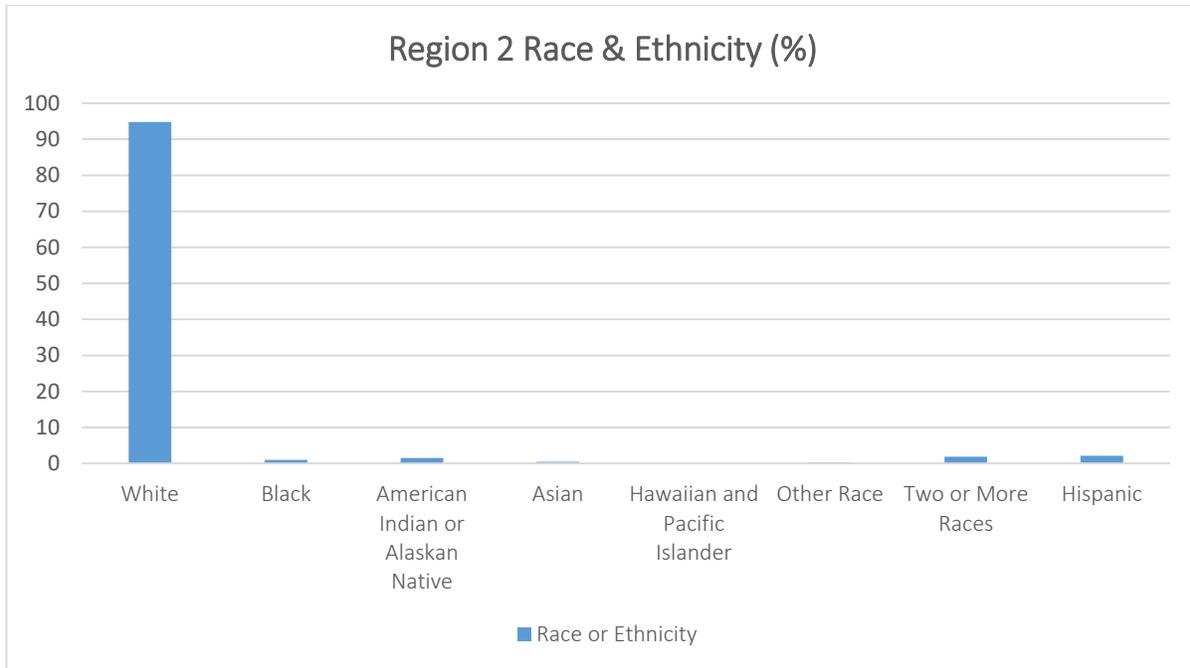
The 10 non-entitlement counties comprising Region 2 experienced a net population increase of 6.6 percent between 2000 and 2014 – increasing from a cumulative population of 281,468 to 299,932 (2000 Census, 2010-2014 ACS). However, within that time period, Region 2 saw only a slight increase of 1.2 percent from 2009 to 2014. Most of the counties in Region 2 experienced varying increases of population over the 14-year time period, with one county that saw a decline in population (Charlevoix County). From 2009 to 2014 the number

of counties with a decline in population grew to 5 counties. Grand Traverse County, the largest county in Region 2, saw the biggest growth in population at 14.6 percent, increasing from 77,654 in 2000 to 88,981 in 2014. Charlevoix County was the only county that saw a decline in population at 0.2 percent – decreasing slightly from 26,090 in 2000 to 26,038 in 2014.



Race and Ethnicity

Region 2 is predominantly White, with the group accounting for 94.8 percent of regional population and all remaining racial groups making up the remaining 5.2 percent. American Indians or Alaskan Natives account for almost 1.5 percent of the population. Blacks/African Americans account for less than 1 percent and Asians account for 0.5 percent of the population. Persons identifying as Other and persons identifying with Two or More races both comprise an additional 0.3 percent and 2 percent of the regional population, respectively. Finally, approximately 2.2 percent of the region identify as ethnically Hispanic.



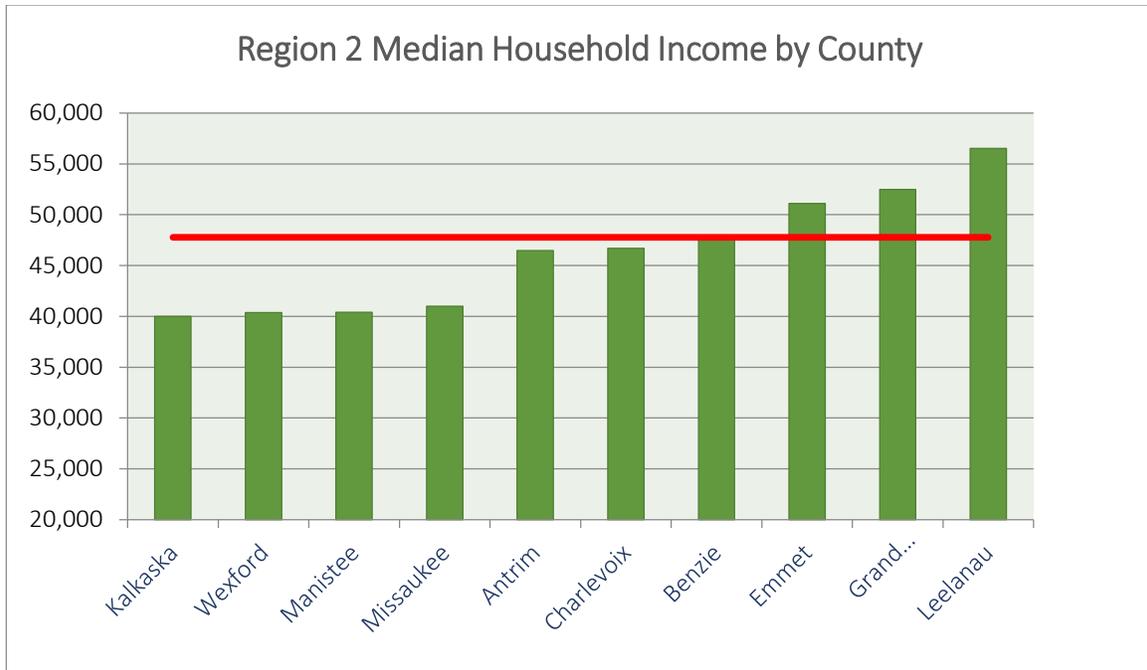
Data Source: 2010-2014 American Community Survey 5-Year Estimates

Age & Disability

Seniors comprised 19 percent of Region 2’s population, with a total of 57,061 persons aged 65 and over. Leelanau County had the highest proportion of seniors at 25.9 percent. Grand Traverse County had the lowest proportion of seniors at 15.8 percent (2010-2014 ACS). Approximately 14.4 percent of the regional population had a disability – 43,277 persons. Manistee County had the highest disability rate at 18.8 percent and Grand Traverse County had the lowest disability rate at 12.3 percent (2010-2014 ACS).

Median Household Income

The median household income (MHI) in the region was \$47,760, however the MHI varied widely among the counties – with seven of the ten counties below the regional MHI. Leelanau County had the highest MHI at \$56,521, while Kalkaska County had the lowest MHI at \$39,986.



Data Source: 2010-2014 American Community Survey 5-Year Estimates

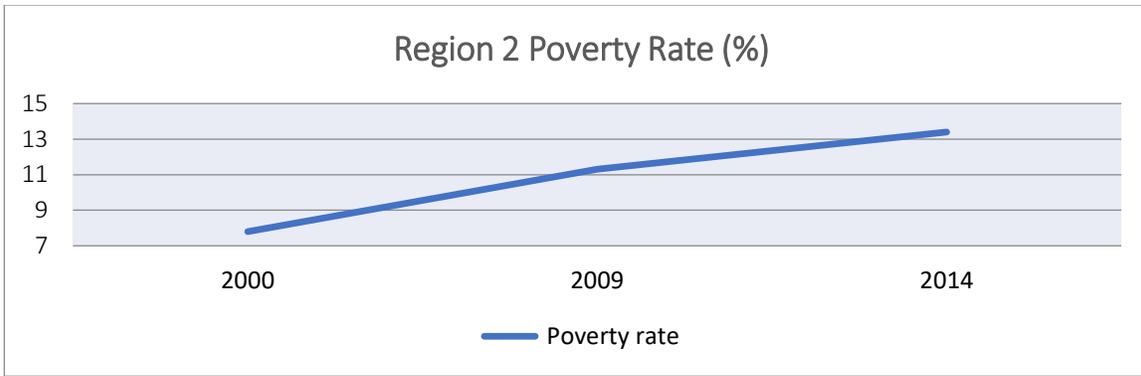
Data Note: The red line represents the regional median household income of \$47,760

Affordability & Housing

HUD defines housing cost burden as when a household spends more than 30 percent of monthly income on housing related costs. Approximately 51.3 percent of renters in Region 2 (11,749 households) were cost burdened according to 2010-2014 ACS estimates. Amongst homeowners, 35.8 percent of owners with a mortgage (21,136 households) and 15.2 percent of owners without a mortgage (5,465 households) were housing cost burdened. Homeowners without mortgages who are cost burdened are often households on fixed incomes (such as the elderly) that pay an inordinate amount of their monthly income on taxes, insurance, and other housing related costs.

Poverty

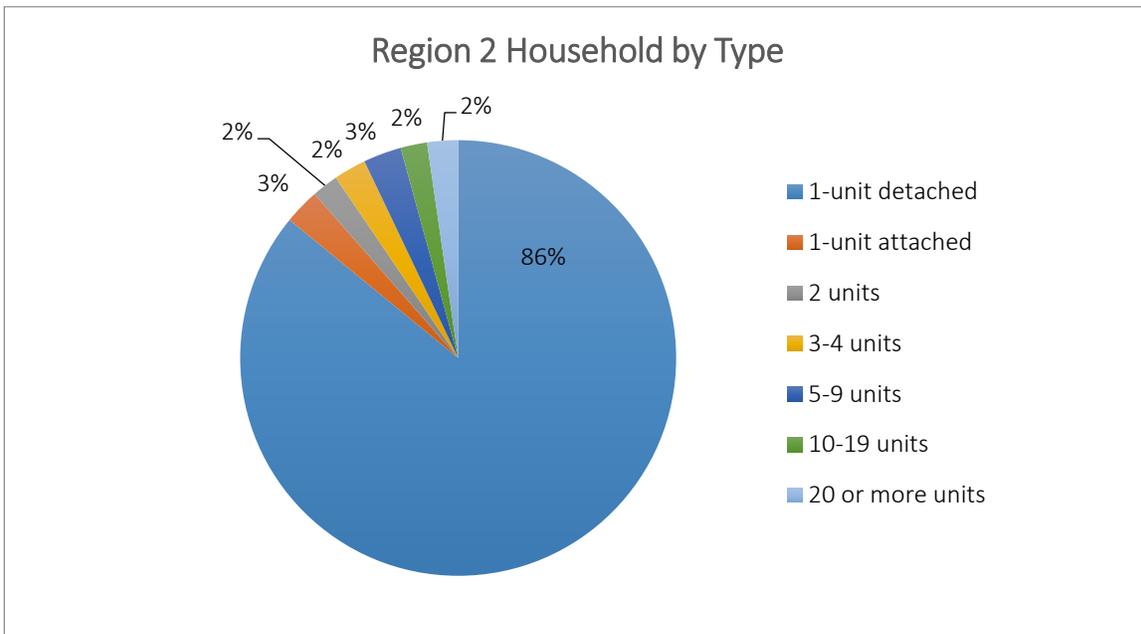
An additional indicator of financial strife is poverty. There were 40,294 persons living below the poverty line in Region 2, according to 2010-2014 ACS estimates – 13.4 percent of the regional population. That represents a 72 percent poverty rate increase from 2000. Emmet County experienced the lowest poverty rate at 11 percent (3,539 persons), and Wexford County experienced the highest poverty rate at 18.9 percent (6,098 persons).



Data Source: Census 2000, 2005-2009 ACS 5-Yr Est., 2010-2014 ACS 5-Year Est.

Housing Stock

There were 179,243 housing units in Region 2 according to 2014 ACS 5-Year Estimates - with Grand Traverse County having the highest number of housing units with 41,885 units and Missaukee County having the least amount with 9,092 housing units. A 1-unit detached structure was by far the most prominent unit type in the region with 78 percent of the units (139,814 units) followed by 5-9 units with 2.6 percent (4,593 units).

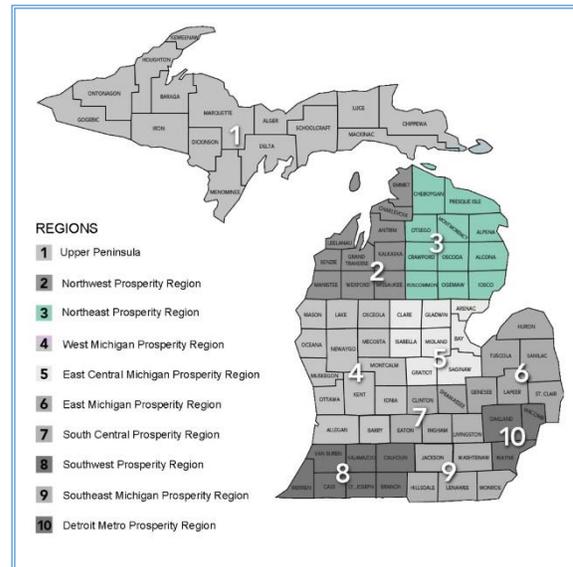


Data Source: 2010-2014 ACS 5-Year Estimates (Chart does not factor in Mobile Homes or Boat/RV/Van)

Region 3 – Northeast Prosperity Region

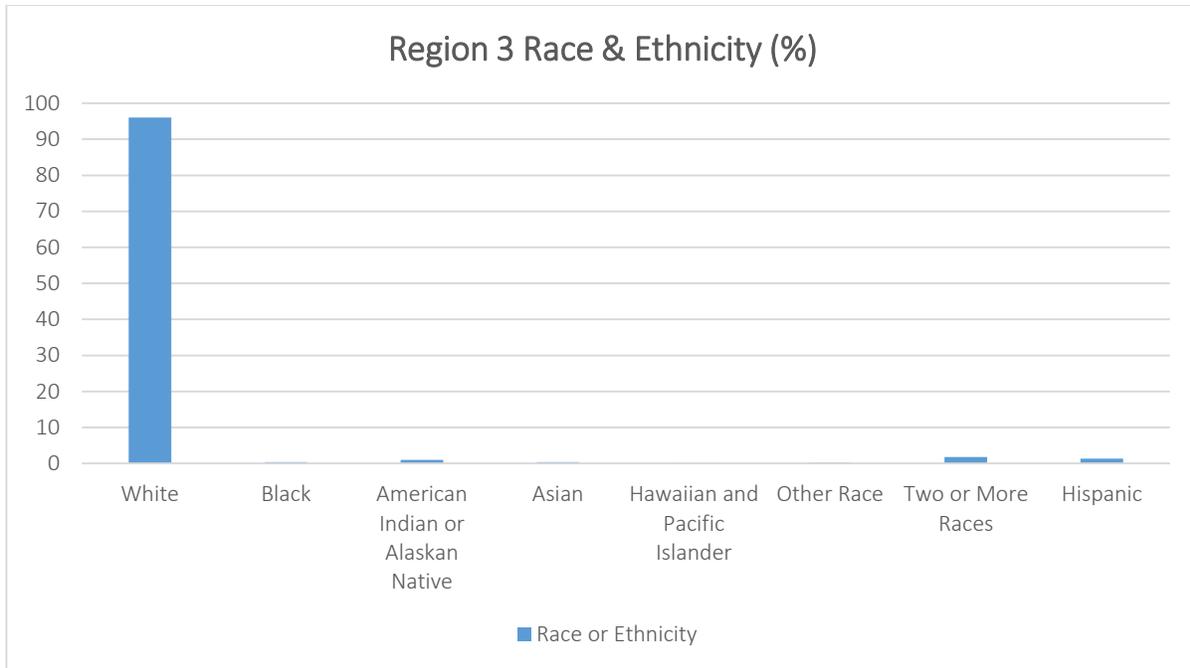
Region 3 consists of the following 11 counties: Alcona, Alpena, Cheboygan, Crawford, Iosco, Montmorency, Ogemaw, Oscoda, Otsego, Presque Isle, and Roscommon.

The 11 non-entitlement counties comprising Region 3 experienced a net population decrease of 4.5 percent between 2000 and 2014 – decreasing from a cumulative population of 215,652 to 205,964 (2000 Census, 2010-2014 ACS). Within that time period, Region 3 saw a slight decrease of 1.7 percent from 2000 to 2009, and then the decrease sped up to 2.9 percent from 2009 to 2014. Almost all of Region 3 counties in experienced a decrease of population over the 14-year time period, with only one county that held on with a small growth rate. Oscoda County saw the sharpest decline in population at 9.5 percent, shrinking from 9,418 in 2000 to 8,525 in 2014. Otsego County saw the only growth in population at 3.5 percent - rising from 23,301 in 2000 to 24,126 in 2014.



Race and Ethnicity

Region 3 is predominantly White, with the group accounting for 96 percent of regional population and all remaining racial groups making up the remaining 4 percent. American Indians or Alaskan Natives account for one percent of the population. Blacks/African Americans account for 0.4 percent and Asians also account for 0.4 percent of the population. Persons identifying as Other and persons identifying with Two or More races both comprise an additional 0.2 and 1.8 percent of the regional population, respectively. Finally, 1.4 percent of the region identify as ethnically Hispanic.



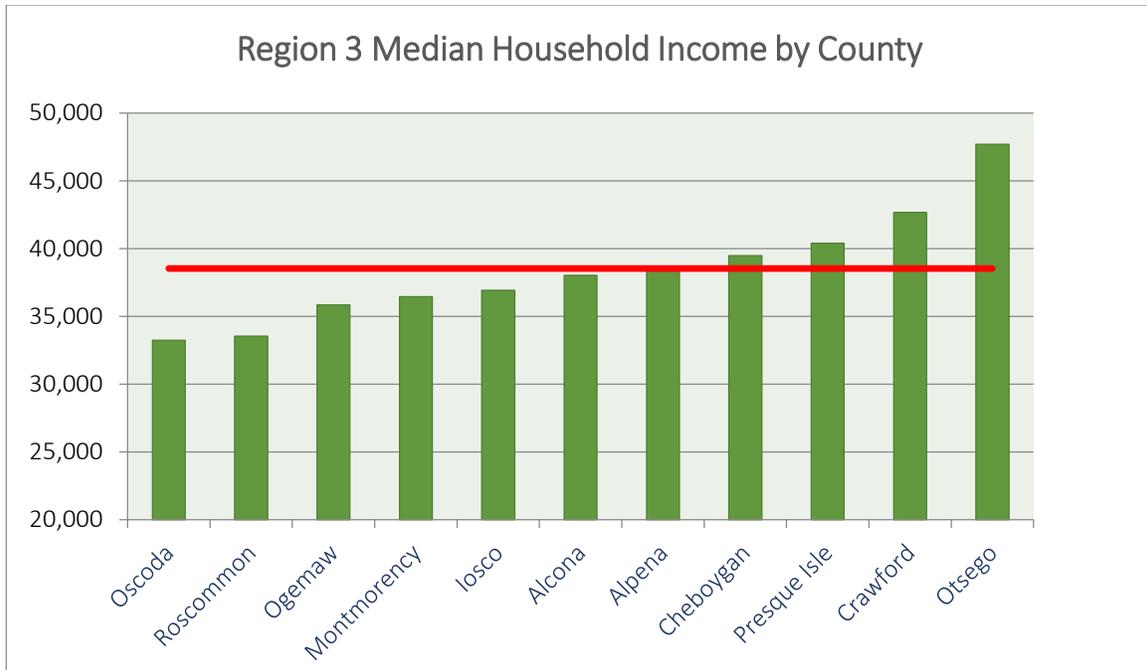
Data Source: 2010-2014 American Community Survey 5-Year Estimates

Age & Disability

Seniors comprised 24.4 percent of Region 3’s population, with a total of 50,243 persons aged 65 and over. Alcona County had the highest proportion of seniors at 33.2 percent. Otsego County had the lowest proportion of seniors at 18.1 percent (2010-2014 ACS). Approximately 20.6 percent of the regional population had a disability – 42,406 persons. Montmorency County had the highest disability rate at 25.7 percent and Otsego County had the lowest disability rate at 15.2 percent (2010-2014 ACS).

Median Household Income

The median household income (MHI) in the region was \$38,539, however the MHI varied widely among the counties – with seven of the eleven counties below the regional MHI. Otsego County had the highest MHI at \$47,693, while Oscoda County had the lowest MHI at \$33,240.



Data Source: 2010-2014 American Community Survey 5-Year Estimates

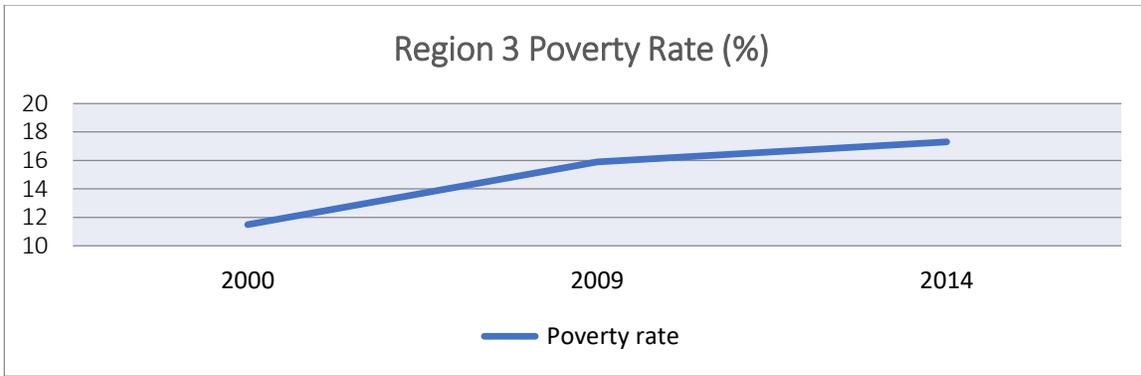
Data Note: The red line represents the regional median household income of \$38,539

Affordability & Housing

HUD defines housing cost burden as when a household spends more than 30 percent of monthly income on housing related costs. Approximately 54.8 percent of renters in Region 3 (7,988 households) were cost burdened according to 2010-2014 ACS estimates. Amongst homeowners, 35.6 percent of owners with a mortgage (14,405 households) and 14.2 percent of owners without a mortgage (4,700 households) were housing cost burdened. Homeowners without mortgages who are cost burdened are often households on fixed incomes (such as the elderly) that pay an inordinate amount of their monthly income on taxes, insurance, and other housing related costs.

Poverty

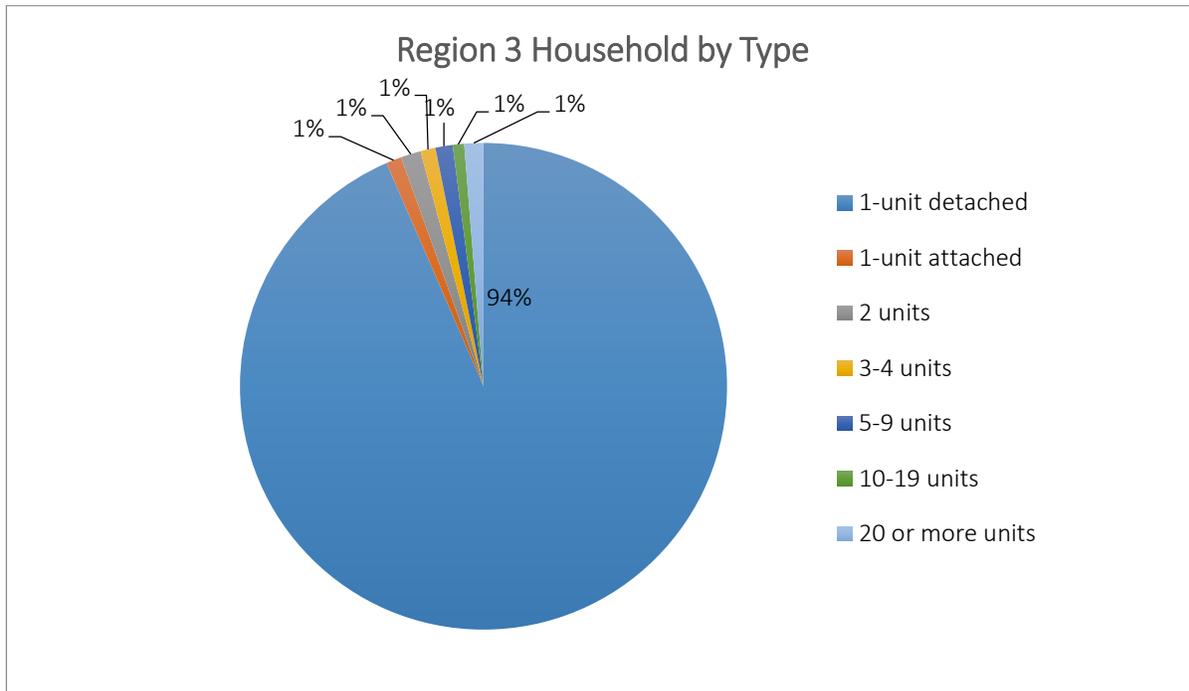
An additional indicator of financial strife is poverty. There were 35,608 persons living below the poverty line in Region 3, according to 2010-2014 ACS estimates – 17.3 percent of the regional population. That represents a 50 percent poverty rate increase from 2000. Otsego County experienced the lowest poverty rate at 13.4 percent (3,162 persons), and Roscommon County experienced the highest poverty rate at 22.1 percent (5,272 persons).



Data Source: Census 2000, 2005-2009 ACS 5-Yr Est., 2010-2014 ACS 5-Year Est.

Housing Stock

There were 161,115 housing units in Region 3 according to 2014 ACS 5-Year Estimates - with Roscommon County having the highest number of housing units with 24,417 units and Oscoda County having the fewest amount with 9,105 housing units. A 1-unit detached structure was by far the most prominent unit type in the region with 94 percent of the units (135,757 units) followed by 2 units with 1.2 percent (1,938 units).



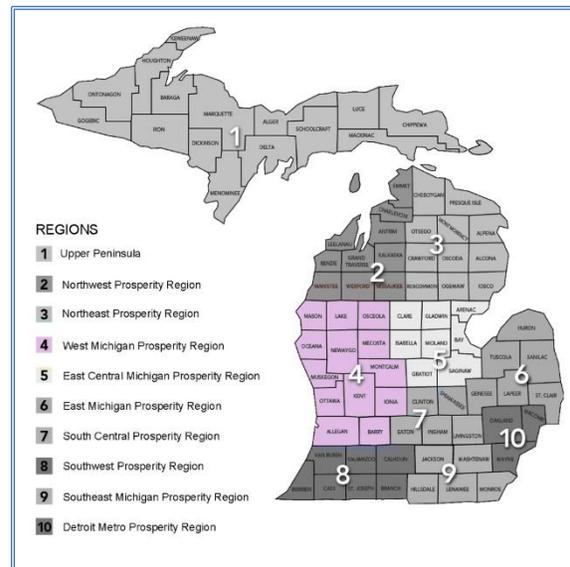
Data Source: 2010-2014 ACS 5-Year Estimates (Chart does not factor in Mobile Homes or Boat/RV/Van)

Region 4 – West Prosperity Region

Region 4 consists of the following 12 counties: Allegan, Barry, Ionia, Lake, Mason, Mecosta, Montcalm, Muskegon, Newaygo, Oceana, Osceola, and Ottawa.

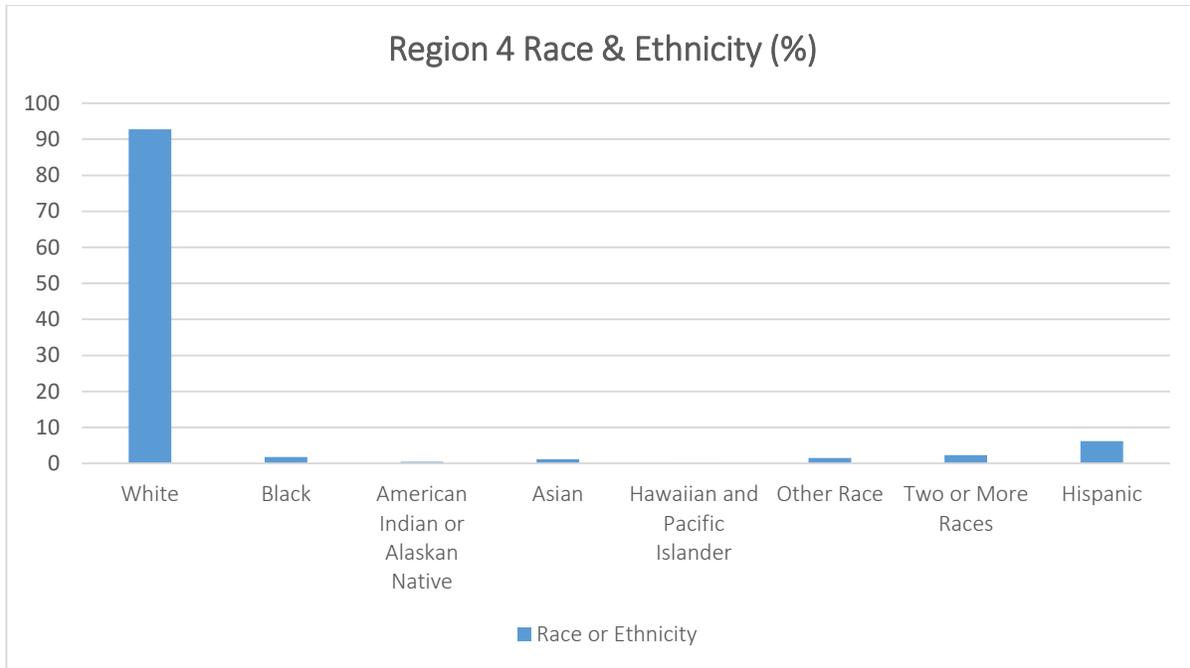
Region 4 contains Kent County which is a CDBG entitlement that was excluded from this analysis. Three entitlement cities—Muskegon, Muskegon Heights, and Norton Shores—that together represent more than 25% of Muskegon County have also been removed from both the County and regional totals.

The 12 non-entitlement counties comprising Region 4 experienced a net population increase of 5.6 percent between 2000 and 2014 – increasing from a cumulative population of 797,141 to 848,088 (2000 Census, 2010-2014 ACS). Within that time period, Region 4 saw a population increase of 6.4 percent from 2000 to 2014. Nearly every county in Region 4 experienced an increase of population over the 14-year time period, with one county that saw a decline in population. Oceana County was the only county that saw a decline in population at 0.2 percent – decreasing slightly from 26,873 in 2000 to 26,325 in 2014. From 2009 to 2014 the number of counties with a decline in population grew to four counties. Overall, Ottawa County saw the biggest growth in population at 13.2 percent, increasing from 238,314 in 2000 to 269,795 in 2014.



Race and Ethnicity

Region 4 is predominantly White, with the group accounting for 92.8 percent of regional population and all remaining racial groups making up the remaining 7.2 percent. Blacks/African Americans account for almost two percent and Asians account for just over one percent of the population. American Indians or Alaskan Natives account for 0.5 percent of the population. Persons identifying as Other and persons identifying with Two or More races both comprise an additional 1.5 percent and 2.3 percent of the regional population, respectively. Finally, approximately 6.2 percent of the region identify as ethnically Hispanic. Individuals can identify as both Hispanic and another race.



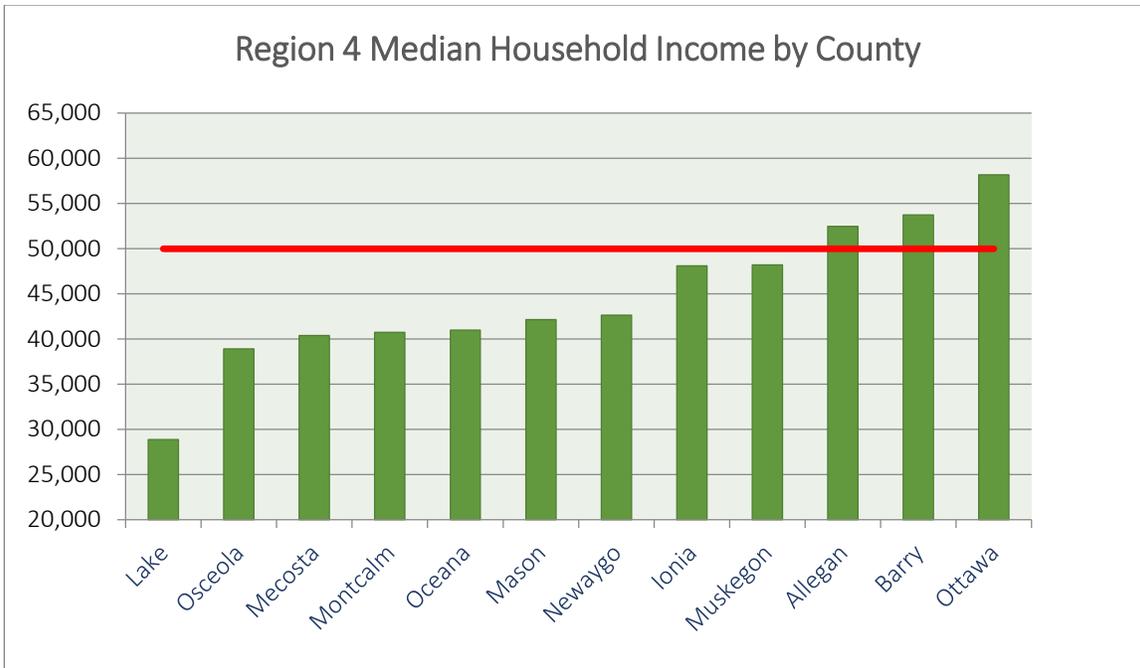
Data Source: 2010-2014 American Community Survey 5-Year Estimates

Age & Disability

Seniors comprised 14.5 percent of Region 4’s population, with a total of 123,116 persons aged 65 and over. Lake County had the highest proportion of seniors at 24.9 percent. Ionia County had the lowest proportion of seniors at 12.1 percent (2010-2014 ACS). Approximately 13.2 percent of the regional population had a disability – 112,162 persons. Lake County had the highest disability rate at 25.9 percent and Ottawa County had the lowest disability rate at 9.7 percent (2010-2014 ACS).

Median Household Income

The median household income (MHI) in the region was \$49,961, however the MHI varied widely among the counties – with nine of the twelve counties below the regional MHI. Ottawa County had the highest MHI at \$58,160, while Lake County had the lowest MHI at \$28,872.



Data Source: 2010-2014 American Community Survey 5-Year Estimates

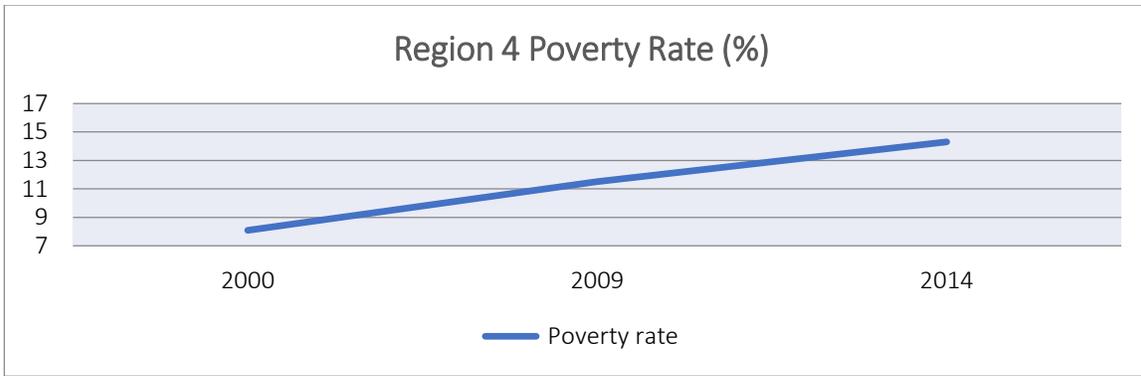
Data Note: The red line represents the regional median household income of \$49,961

Affordability & Housing

HUD defines housing cost burden as when a household spends more than 30 percent of monthly income on housing related costs. Approximately 51 percent of renters in Region 4 (35,475 households) were cost burdened according to 2010-2014 ACS estimates. Amongst homeowners, 30.4 percent of owners with a mortgage (46,666 households) and 13.3 percent of owners without a mortgage (12,265 households) were housing cost burdened. Homeowners without mortgages who are cost burdened are often households on fixed incomes (such as the elderly) that pay an inordinate amount of their monthly income on taxes, insurance, and other housing related costs.

Poverty

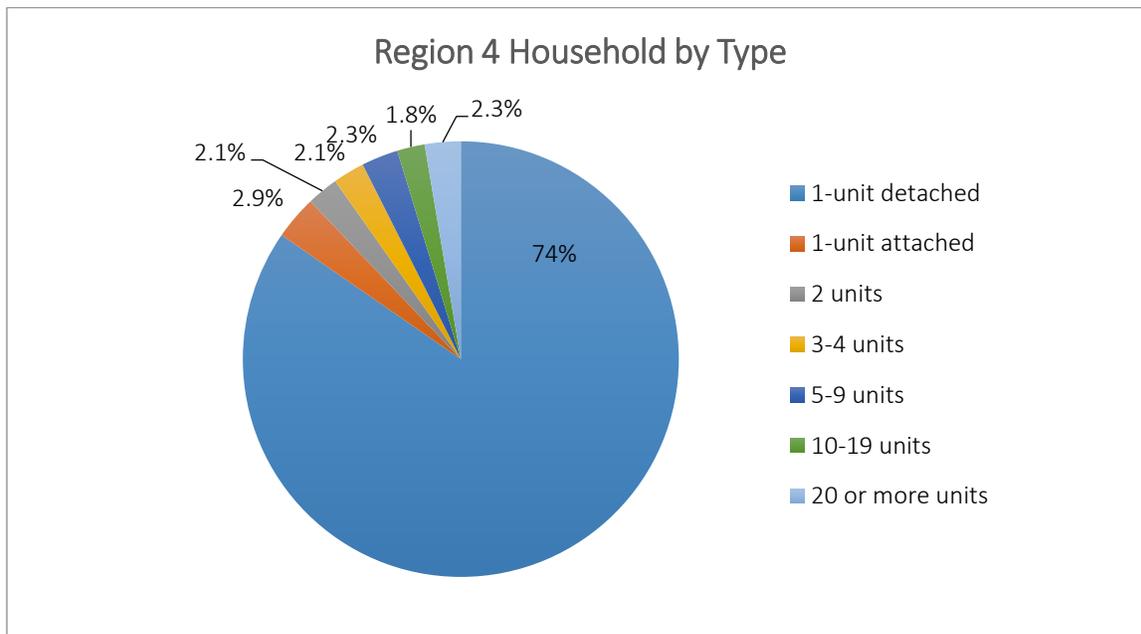
An additional indicator of financial strife is poverty. There were 121,540 persons living below the poverty line in Region 4, according to 2010-2014 ACS estimates – 14.3 percent of the regional population. That represents an 87 percent poverty rate increase from 2000. Ottawa County experienced the lowest poverty rate at 10.7 percent (27,849 persons), and Lake County experienced the highest poverty rate at 30.5 percent (3,359 persons).



Data Source: Census 2000, 2005-2009 ACS 5-Yr Est., 2010-2014 ACS 5-Year Est.

Housing Stock

There were 381,437 housing units in Region 4 according to 2014 ACS 5-Year Estimates - with Ottawa County having the highest number of housing units with 103,306 units and Osceola County having the least amount with 13,596 housing units. A 1-unit detached structure was by far the most prominent unit type in the region with 74.4 percent of the units (283,895 units) followed by 1-unit attached structure with 2.9 percent (10,882 units).



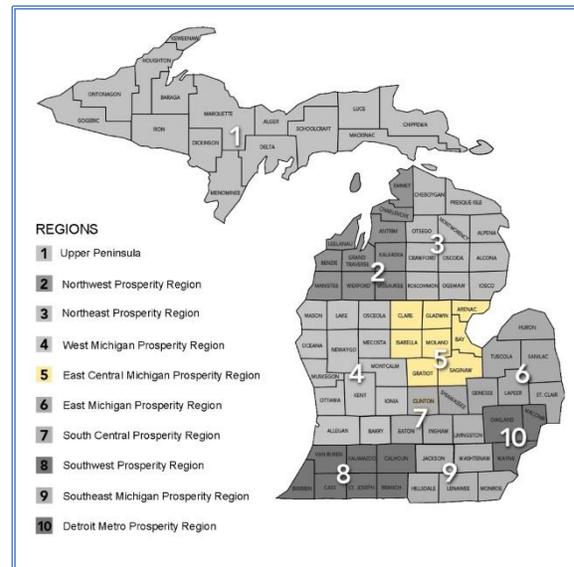
Data Source: 2010-2014 ACS 5-Year Estimates (Chart does not factor in Mobile Homes or Boat/RV/Van)

Region 5 – East Central Prosperity Region

Region 5 consists of the following 8 counties: Arenac, Bay, Clare, Gladwin, Gratiot, Isabella, Midland, and Saginaw.

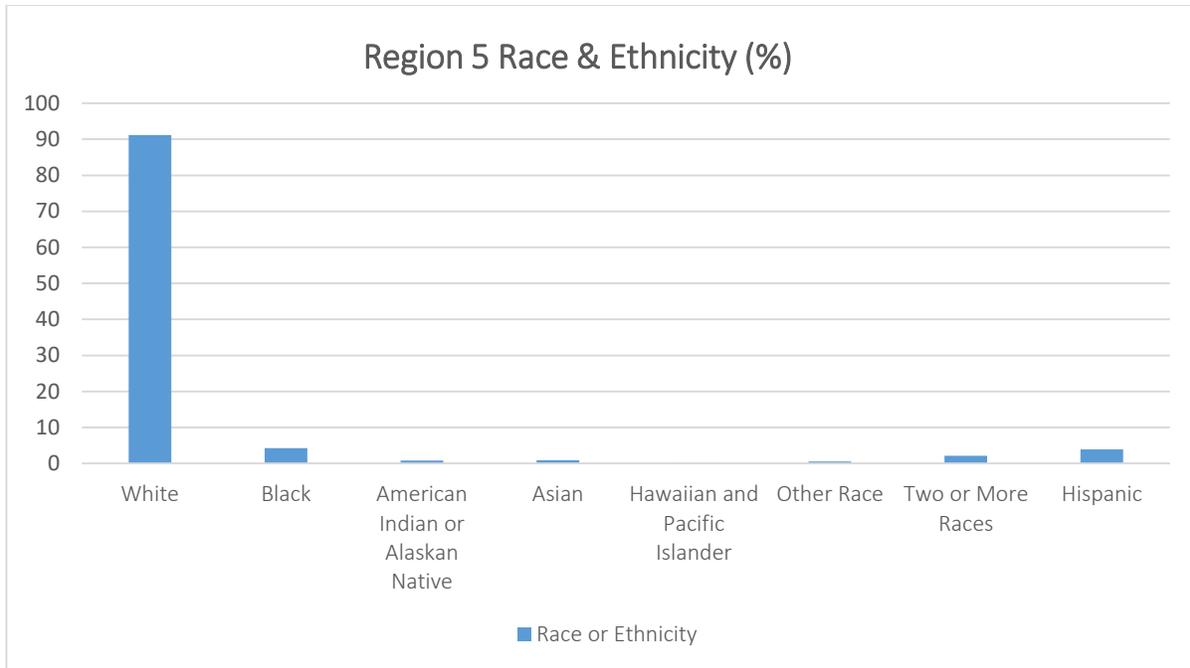
Region 5 contains three entitlement cities; their data has been removed from the counties that they are in, as well as the regional totals. The three cities are Midland City in Midland County, Bay City in Bay County, and Saginaw City in Saginaw County.

The 8 non-entitlement counties comprising Region 5 experienced a slight population increase of 0.6 percent between 2000 and 2014 – increasing from a cumulative population of 442,949 to 445,588 (2000 Census, 2010-2014 ACS). A majority of counties in Region 5 experienced a decrease of population over the 14-year time period, while only two counties had growth rates. Arenac County saw the sharpest decline in population at 9.9 percent, shrinking from 17,269 in 2000 to 15,564 in 2014. Isabella County saw the biggest growth in population at 11.3 percent - rising from 63,351 in 2000 to 70,506 in 2014.



Race and Ethnicity

Region 5 is predominantly White, with the group accounting for 91.2 percent of regional population and all remaining racial groups making up the remaining 8.8 percent. Blacks/African Americans account for 4.3 percent and Asians account for 0.9 percent of the population. American Indians or Alaskan Natives account for almost 0.8 percent of the population. Persons identifying as Other and persons identifying with Two or More races both comprise an additional 0.5 percent and 2.1 percent of the regional population, respectively. Finally, nearly 4 percent of the region identify as ethnically Hispanic.



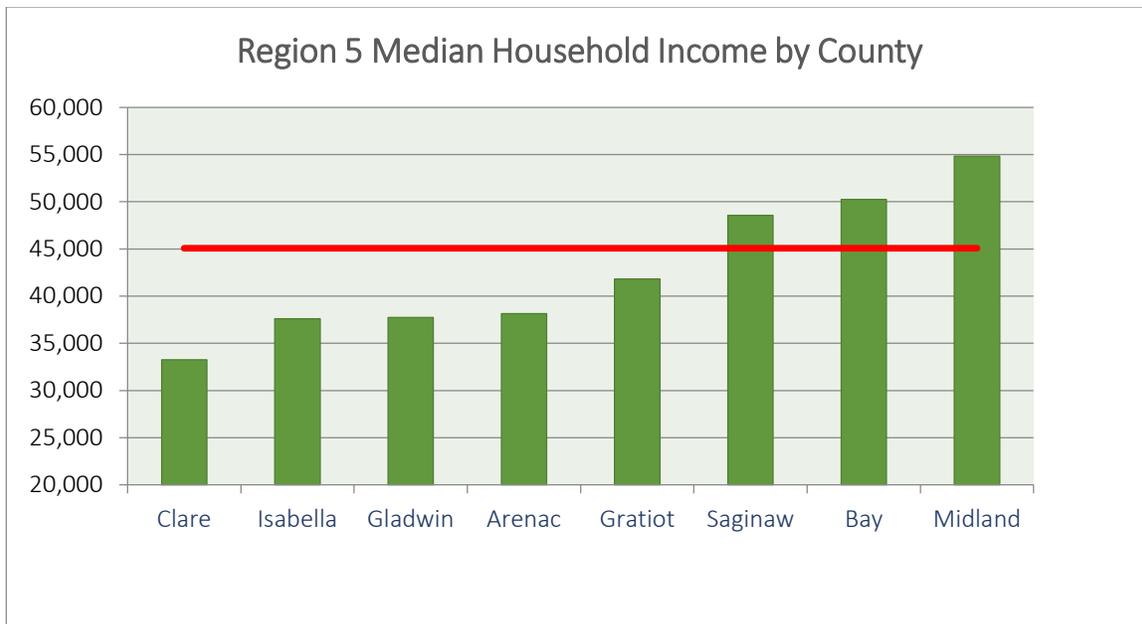
Data Source: 2010-2014 American Community Survey 5-Year Estimates

Age & Disability

Seniors comprised 16.2 percent of Region 5’s population, with a total of 76,420 persons aged 65 and over. Gladwin County had the highest proportion of seniors at 23.8 percent. Isabella County had the lowest proportion of seniors at 10.3 percent (2010-2014 ACS). Approximately 15 percent of the regional population had a disability – 66,776 persons. Gladwin County had the highest disability rate at 20.4 percent and Isabella County had the lowest disability rate at 12.4 percent (2010-2014 ACS).

Median Household Income

The median household income (MHI) in the region was \$45,083, however the MHI varied widely among the counties – with five of the eight counties below the regional MHI. Midland County had the highest MHI at \$54,820, while Clare County had the lowest MHI at \$33,264.



Data Source: 2010-2014 American Community Survey 5-Year Estimates

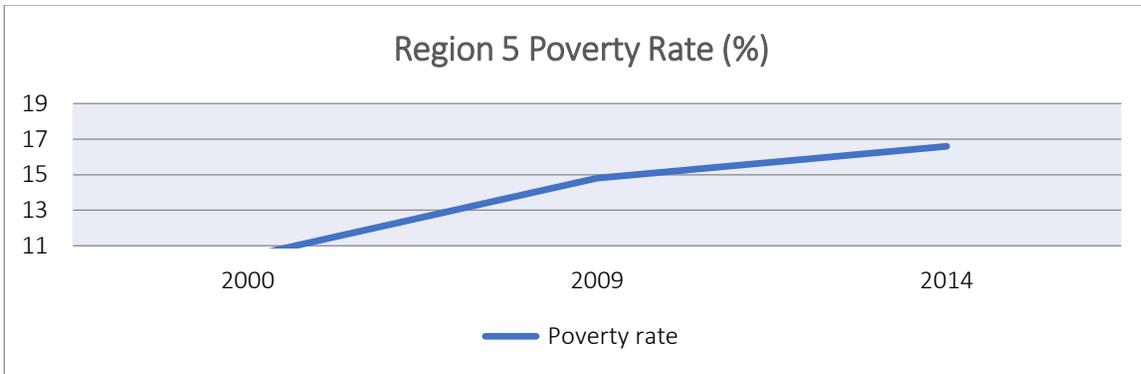
Data Note: The red line represents the regional median household income of \$45,083

Affordability & Housing

HUD defines housing cost burden as when a household spends more than 30 percent of monthly income on housing related costs. Approximately 55.5 percent of renters in Region 5 (20,014 households) were cost burdened according to 2010-2014 ACS estimates. Amongst homeowners, 36.4 percent of owners with a mortgage (27,578 households) and 14.5 percent of owners without a mortgage (8,260 households) were housing cost burdened. Homeowners without mortgages who are cost burdened are often households on fixed incomes (such as the elderly) that pay an inordinate amount of their monthly income on taxes, insurance, and other housing related costs.

Poverty

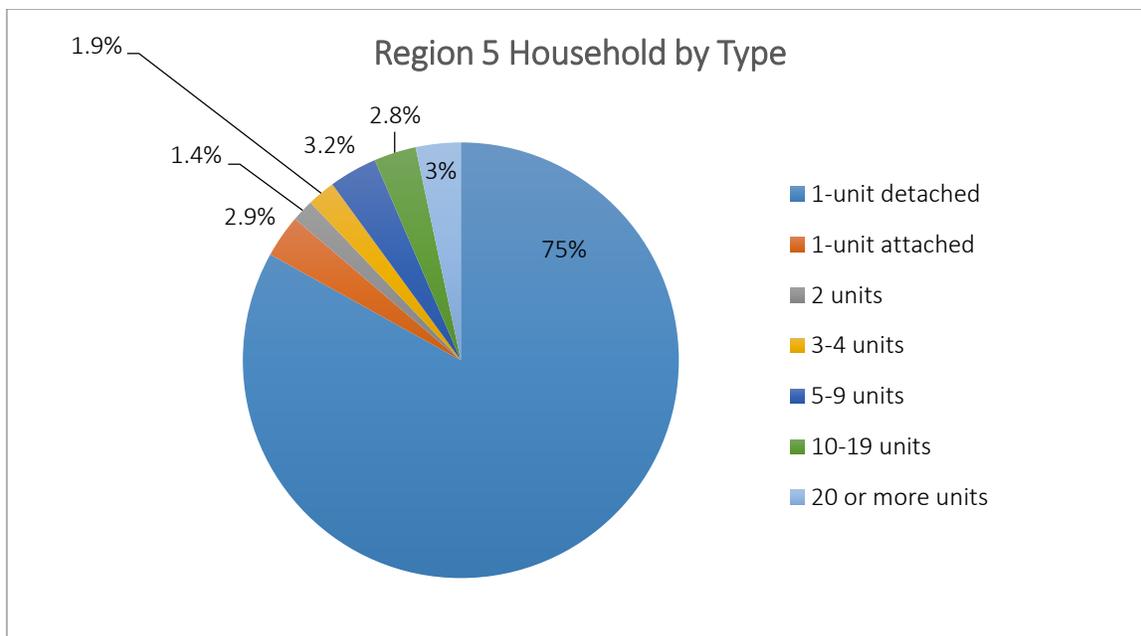
An additional indicator of financial strife is poverty. There were 73,897 persons living below the poverty line in Region 5, according to 2010-2014 ACS estimates – 16.6 percent of the regional population. That represents a 60 percent poverty rate increase from 2000. Bay County experienced the lowest poverty rate at 11.6 percent (8,417 persons), and Isabella County experienced the highest poverty rate at 31.8 percent (20,408 persons).



Data Source: Census 2000, 2005-2009 ACS 5-Yr Est., 2010-2014 ACS 5-Year Est.

Housing Stock

There were 207,605 housing units in Region 5 according to 2014 ACS 5-Year Estimates - with Saginaw County having the highest number of housing units with 86,814 units and Arenac County having the least amount with 9,771 housing units. A 1-unit detached structure was by far the most prominent unit type in the region with 75 percent of the units (155,711 units) followed by 5-9 units with 3.2 percent (6,699 units).

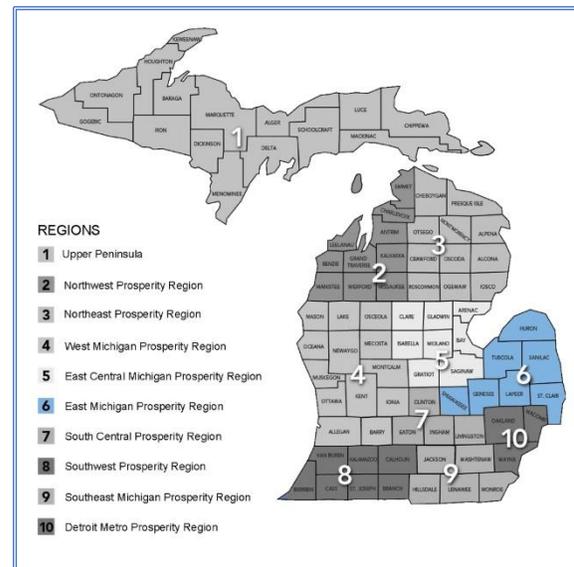


Data Source: 2010-2014 ACS 5-Year Estimates (Chart does not factor in Mobile Homes or Boat/RV/Van)

Region 6 – East Prosperity Region

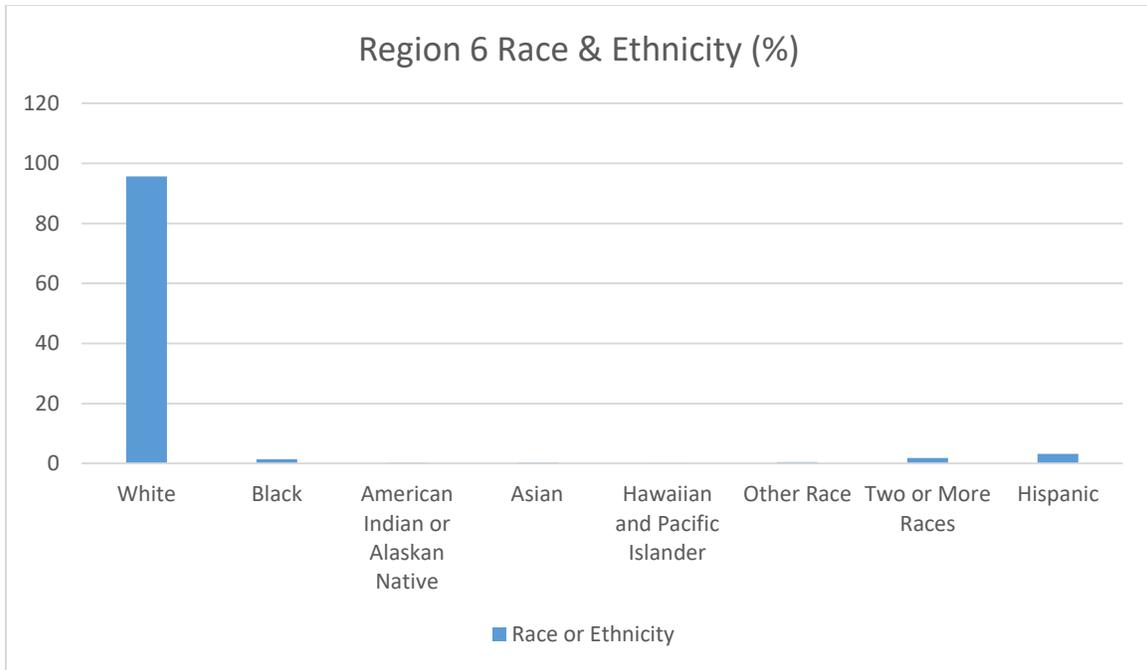
The Region 6 consists of the following 6 counties: Huron, Tuscola, Sanilac, Shiawassee, Lapeer, and St. Clair.

Note that the City of Flint and the rest of Genesee County are both CDBG entitlements and excluded from this analysis. The 6 non-entitlement counties comprising Region 6 experienced a net population decrease of 3.1 percent between 2000 and 2014 – decreasing from a cumulative population of 462,718 to 448,337 (2000 Census, 2010-2014 ACS). However, there was a slight increase in population that occurred between the years 2000 and 2009. Between 2000 and 2009 the region saw a population increase of 0.5 percent (2,385 people). A majority of counties in Region 8 experienced a decrease of population over the 14-year time period, while only one county held on with a very small increase in population. Lapeer County saw the only increase in population with 0.3 percent (251 people).



Race and Ethnicity

Region 6 is predominantly White, with the race group accounting for 95.6 percent of regional population and all remaining racial groups making up the remaining 4.4 percent. Individuals who identify as Two or More Races are the second largest group and make up 1.8 percent of the population. Black or African American are the third largest group and make up 1.4 percent of the population. All other racial groups make up less than 1 percent of the population each. Finally, 3.2 percent of the region identify as ethnically Hispanic (individuals can identify as Hispanic and another race).



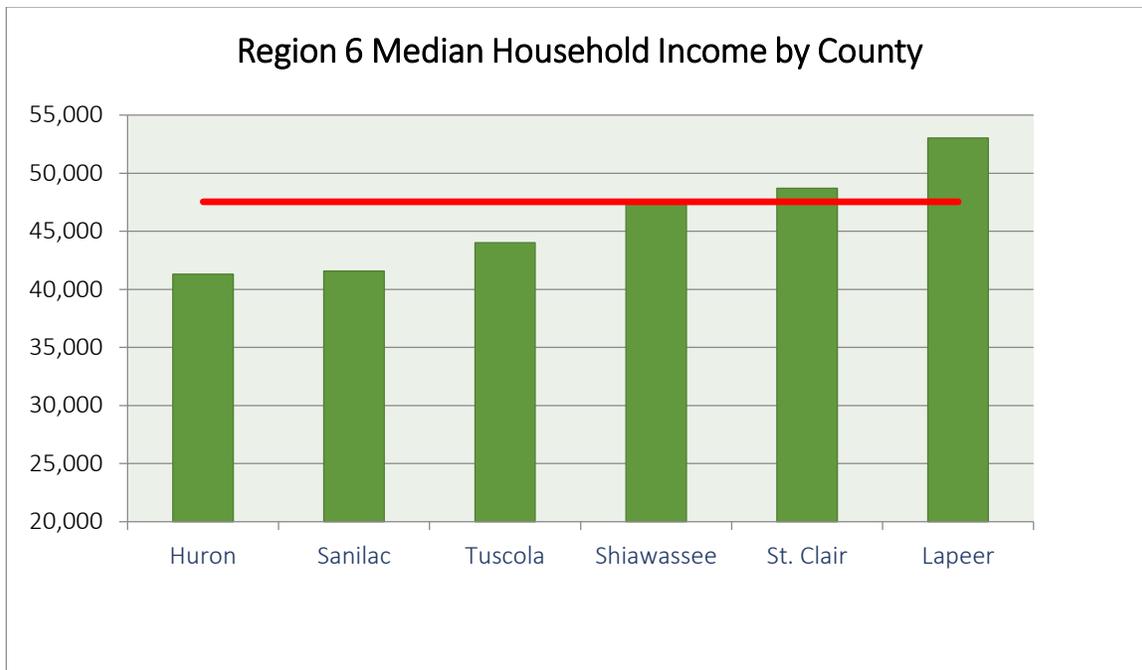
Data Source: 2010-2014 American Community Survey 5-Year Estimates

Age & Disability

Seniors comprised 16.4 percent of Region 6’s population, with a total of 73,412 persons aged 65 and over. Huron County had the highest proportion of seniors at 22.6 percent. Lapeer County had the lowest proportion of seniors at 14.7 percent. Approximately 15.6 percent of the regional population had a disability – 70,287 persons. Tuscola County had the highest proportion of disabled persons at 17.9 percent and Lapeer County had the lowest proportion of disabled persons at 13.7 percent (2010-2014 ACS).

Median Household Income

The median household income (MHI) in the region was \$47,533, however the MHI varied widely among the counties – with three of the six counties below the regional MHI. Lapeer County had the highest MHI at \$53,016, while Huron County had the lowest MHI at \$41,290.



Data Source: 2010-2014 American Community Survey 5-Year Estimates

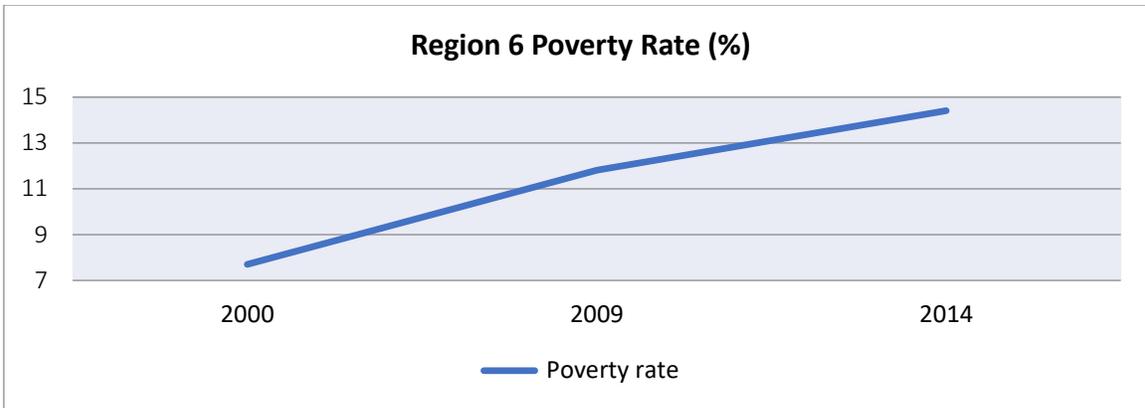
Data Note: The red line represents the regional median household income of \$47,533

Affordability & Housing

HUD defines housing cost burden as when a household spends more than 30 percent of monthly income on housing related costs. Fifty-three percent of renters in Region 6 (17,225 households) were cost burdened according to 2010-2014 ACS estimates. Amongst homeowners, 33.7 percent of owners with a mortgage (28,414 households) and 14.7 percent of owners without a mortgage (7,884 households) were housing cost burdened. Homeowners without mortgages who are cost burdened are often households on fixed incomes (such as the elderly) that pay an inordinate amount of their monthly income on taxes, insurance, and other housing related costs.

Poverty

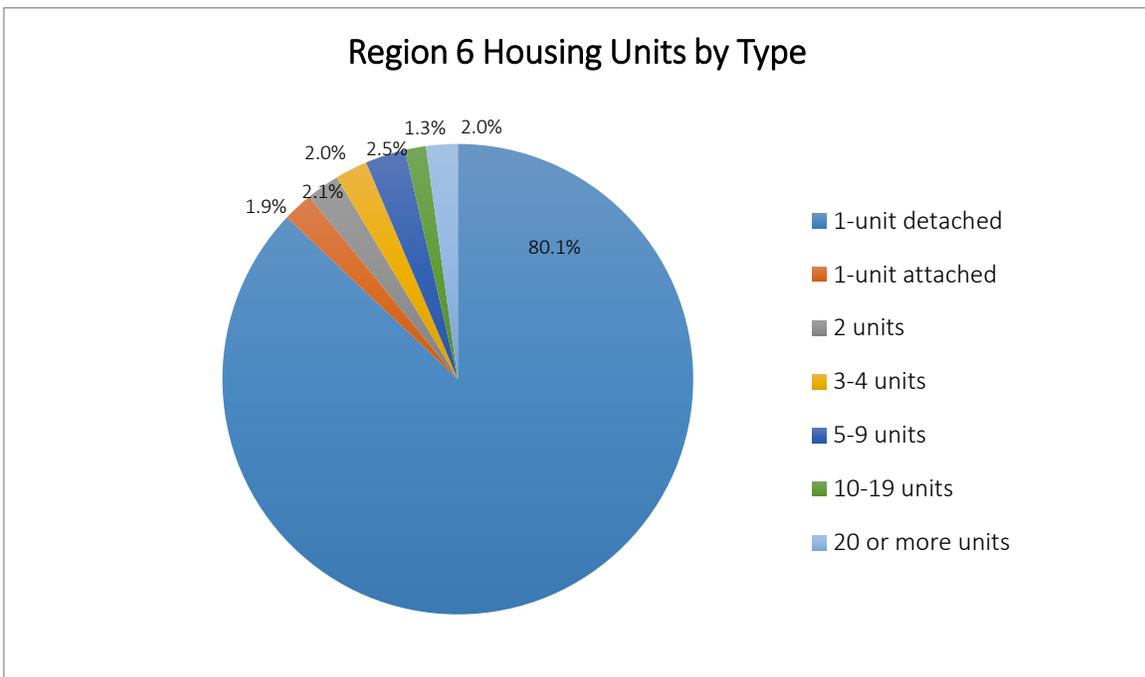
An additional indicator of financial strife is poverty. There were 64,552 persons living below the poverty line in Region 6, according to 2010-2014 ACS estimates – 14.4 percent of the regional population. That represents an 80.6 percent poverty rate increase from 2000. Lapeer County experienced the lowest poverty rate at 11.6 percent (9,991 persons), and Sanilac County experienced the highest poverty rate at 15.6 percent (6,536 persons).



Data Source: Census 2000, 2005-2009 ACS 5-Yr Est., 2010-2014 ACS 5-Year Est.

Housing Stock

There were 206,346 housing units in Region 6 according to 2014 ACS 5-Year Estimates – with St. Clair County having the highest number of housing units with 71,791 units and Huron County having the smallest amount with 21,162 housing units. A 1-unit detached structure was by far the most prominent unit type in the region with 80.1 percent of the units (165,230 units) followed by 5-9 units with 2.5 percent (5,239 units).



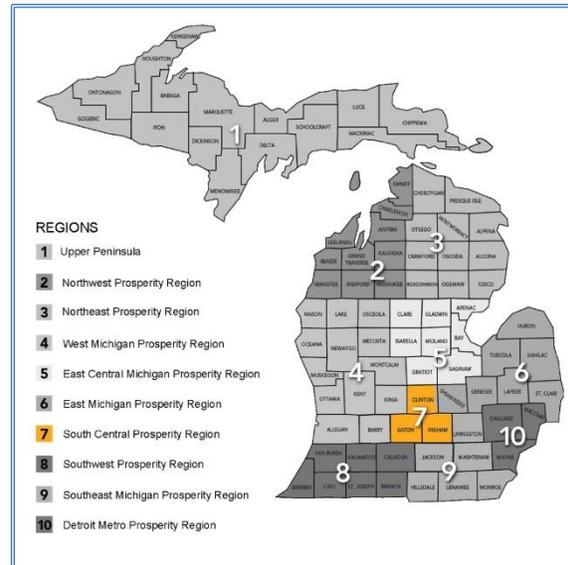
Data Source: 2010-2014 ACS 5-Year Estimates (Chart does not factor in Mobile Homes or Boat/RV/Van)

Region 7 – South Central Prosperity Region

The Region 7 consists of the following 3 counties: Clinton, Eaton, and Ingham.

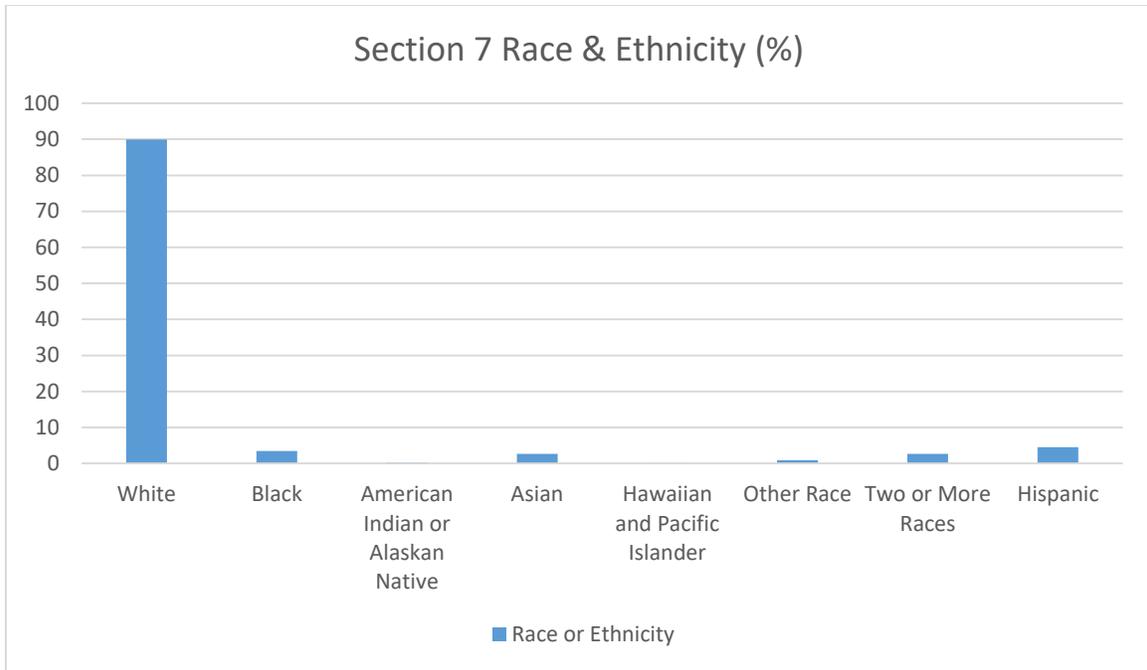
Region 7 contains two entitlement cities; their data has been removed from the counties that they are in, as well as the regional totals. The two cities are Lansing and East Lansing, both of which are in Ingham County.

The 3 non-entitlement counties comprising Region 7 experienced a net population increase of 7.8 percent between 2000 and 2014 – increasing from a cumulative population of 282,075 to 304,129 (2000 Census, 2010-2014 ACS). Every county in Region 7 experienced an increase in population over the 14-year time period. Clinton County saw the largest increase in population with a growth of 18.1 percent. The non-entitled portions of Ingham County saw the second largest increase with 5.1 percent, and Eaton County grew more slowly with growth of 3.0 percent.



Race and Ethnicity

Region 7 is predominantly White, with the race group accounting for 90 percent of regional population and all remaining racial groups making up the remaining 10 percent. Blacks or African Americans are the second largest racial group and account for 3.5 percent of the population. Asians are the third largest group and make up 2.7 percent of the population. Two or More Races account for 2.7 percent, persons identifying as Other Race make up 0.9 percent, American Indian or Alaskan Natives account for 0.3 percent of the population. Only 40 people in the region identify as Hawaiian and Pacific Islander, accounting for 0.01 percent. Finally, just 4.5 percent of the region identify as ethnically Hispanic (individuals can identify as Hispanic and another race).



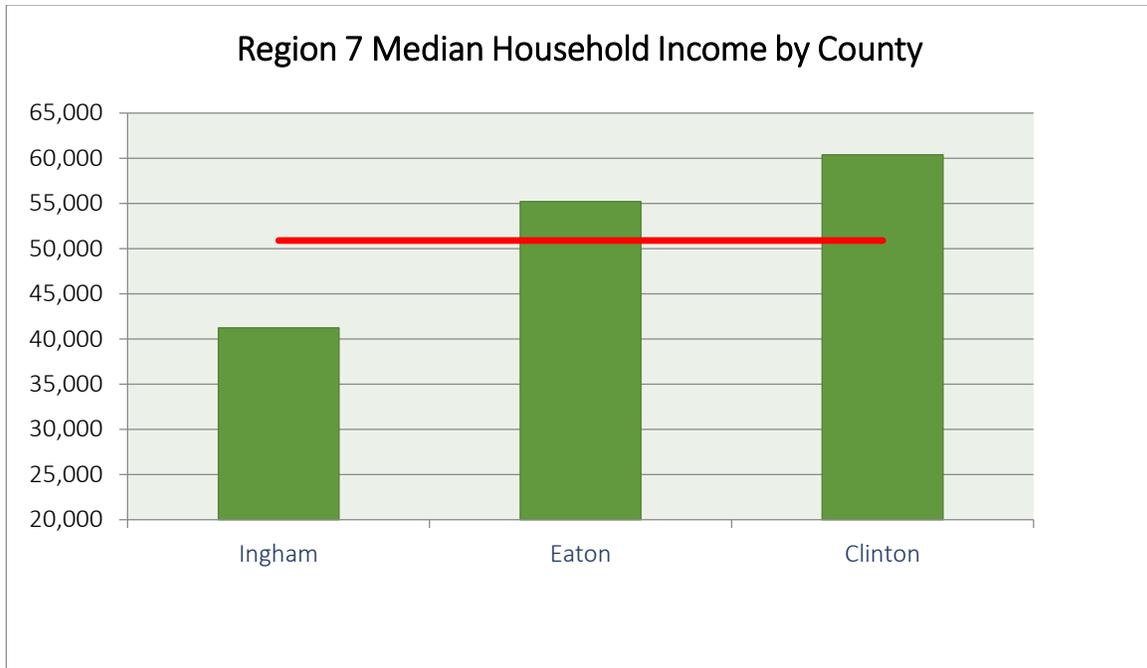
Data Source: 2010-2014 American Community Survey 5-Year Estimates

Age & Disability

Seniors comprised 12.6 percent of Region 7’s population, with a total of 58,793 persons aged 65 and over. Eaton County had the highest proportion of seniors at 15.2 percent. The non-entitled portions of Ingham County had the lowest proportion of seniors at 11.2 percent. Approximately 11.5 percent of the regional population had a disability – 35,050 persons. Eaton County had the highest proportion of disabled persons at 13.6 percent and the non-entitled portions of Ingham County had the lowest proportion of disabled persons at 10.2 percent (2010-2014 ACS).

Median Household Income

The median household income (MHI) in the region was \$50,879, however the MHI varied among the counties – with one of the three counties below the regional MHI. Clinton County had the highest MHI at \$60,381, while the non-entitled portions of Ingham County had the lowest MHI at \$41,243.



Data Source: 2010-2014 American Community Survey 5-Year Estimates

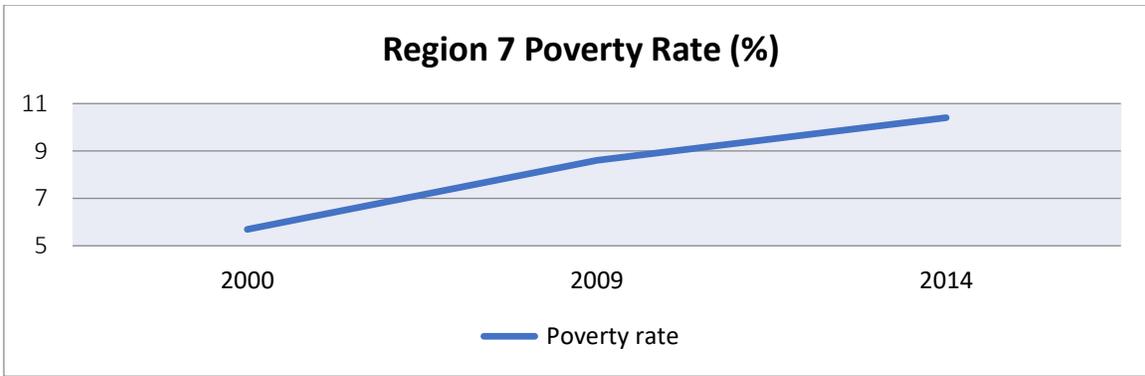
Data Note: The red line represents the regional median household income of \$50,879

Affordability & Housing

HUD defines housing cost burden as when a household spends more than 30 percent of monthly income on housing related costs. Forty-eight percent of renters in Region 7 (14,402 households) were cost burdened according to 2010-2014 ACS estimates. Amongst homeowners, 26.1 percent of owners with a mortgage (15,596 households) and 13.6 percent of owners without a mortgage (3,842 households) were housing cost burdened. Homeowners without mortgages who are cost burdened are often households on fixed incomes (such as the elderly) that pay an inordinate amount of their monthly income on taxes, insurance, and other housing related costs.

Poverty

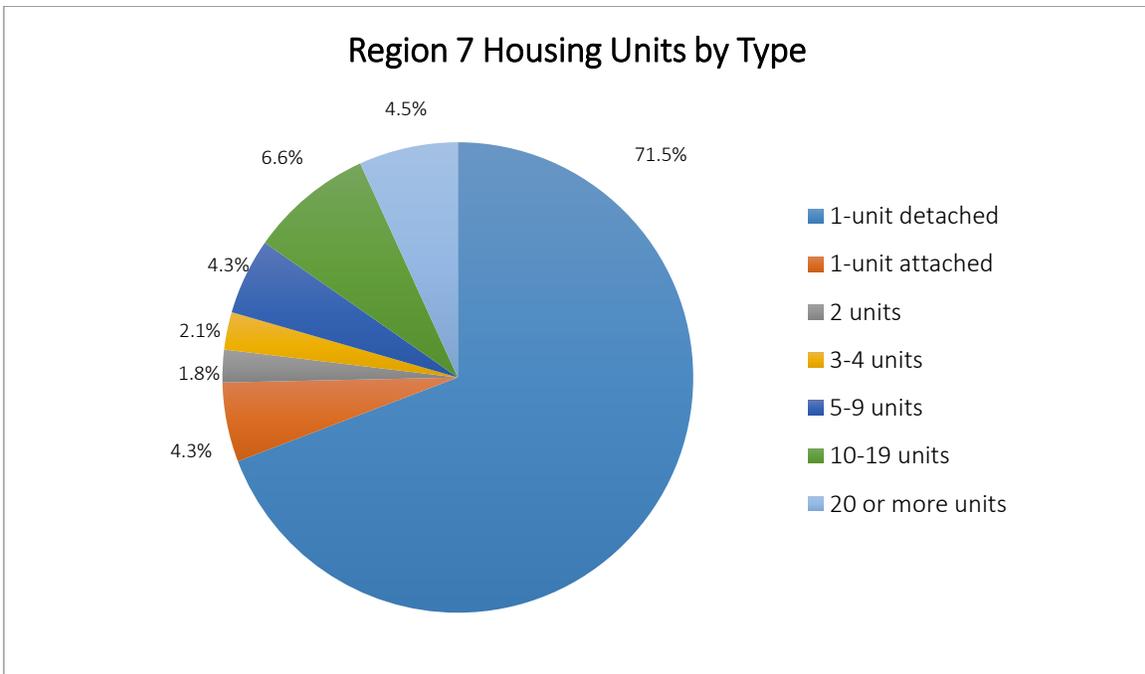
An additional indicator of financial strife is poverty. There were 31,641 persons living below the poverty line in Region 7, according to 2010-2014 ACS estimates – 10.4 percent of the regional population. That represents a 95.6 percent poverty rate increase from 2000. The non-entitled portions of Ingham County experienced the lowest poverty rate at 9.8 percent (11,745 persons), and Clinton County experienced the highest poverty rate at 11.0 percent (8,782 persons).



Data Source: Census 2000, 2005-2009 ACS 5-Yr Est., 2010-2014 ACS 5-Year Est.

Housing Stock

There were 128,671 housing units in Region 7 according to 2014 ACS 5-Year Estimates – with the non-entitled portions of Ingham County having the highest number of housing units with 50,865 units and Clinton County having the least amount with 30,774 housing units. A 1-unit detached structure was by far the most prominent unit type in the region with 71.5 percent of the units (92,020 units) followed by 10-19 units with 6.6 percent (8,465 units).



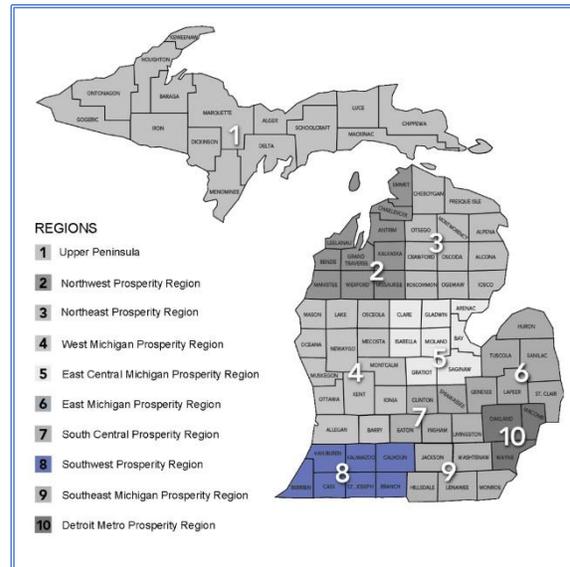
Data Source: 2010-2014 ACS 5-Year Estimates (Chart does not factor in Mobile Homes or Boat/RV/Van)

Region 8 – Southwest Prosperity Region

The Region 8 consists of the following 7 counties: Berrien, Branch, Calhoun, Cass, Kalamazoo, St. Joseph, and Van Buren.

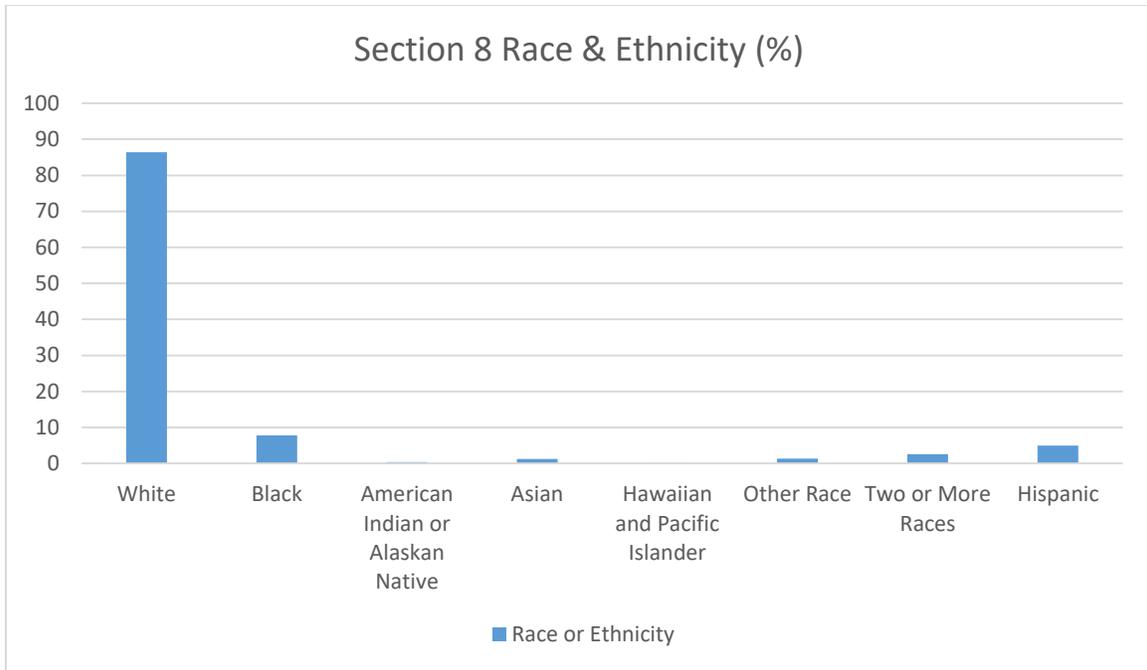
Region 8 contains three entitlement cities for which data has been removed from the counties that they are in, as well as the regional totals. The three cities are Kalamazoo and Portage in Kalamazoo County, and Battle Creek in Calhoun County. Other entitlement cities in this region did not exceed 25% of their respective county populations and were kept in the data set.

The 7 non-entitlement counties comprising Region 8 experienced a net population increase of 0.8 percent between 2000 and 2014 – increasing from a cumulative population of 599,211 to 604,255 (2000 Census, 2010-2014 ACS). However, the increase in population only occurred between the years 2000 and 2009. Between 2009 and 2014 the region saw a slight population decrease of 0.5 percent. A majority of counties in Region 8 experienced a decrease of population over the 14-year time period, while only two counties held on with small growth rates. Branch County and Berrien County saw the sharpest decline in population at 4 percent. Branch County shrunk from 45,787 in 2000 to 43,965 in 2014, and Berrien shrunk from 162,453 in 2000 to 155,992 in 2014. Kalamazoo County, the largest county in Region 8, saw the largest growth in population at 13.7 percent, rising from 116,561 in 2000 to 132,543 in 2014.



Race and Ethnicity

Region 8 is predominantly White, with the race group accounting for 86.4 percent of regional population and all remaining racial groups making up the remaining 13.6 percent. Blacks or African Americans are the second largest racial group and account for 7.8 percent of the population. Individuals who identify as Two or More Races are the third largest group and make up 2.6 percent of the population. Asians account for 1.3 percent, persons identifying as Other Race make up 1.4 percent, American Indian or Alaskan Natives account for almost half of one percent of the population. Only 111 people in the region identify as Hawaiian and Pacific Islander, accounting for 0.01 percent. Finally, just over five percent of the region identify as ethnically Hispanic (individuals can identify as Hispanic and another race).



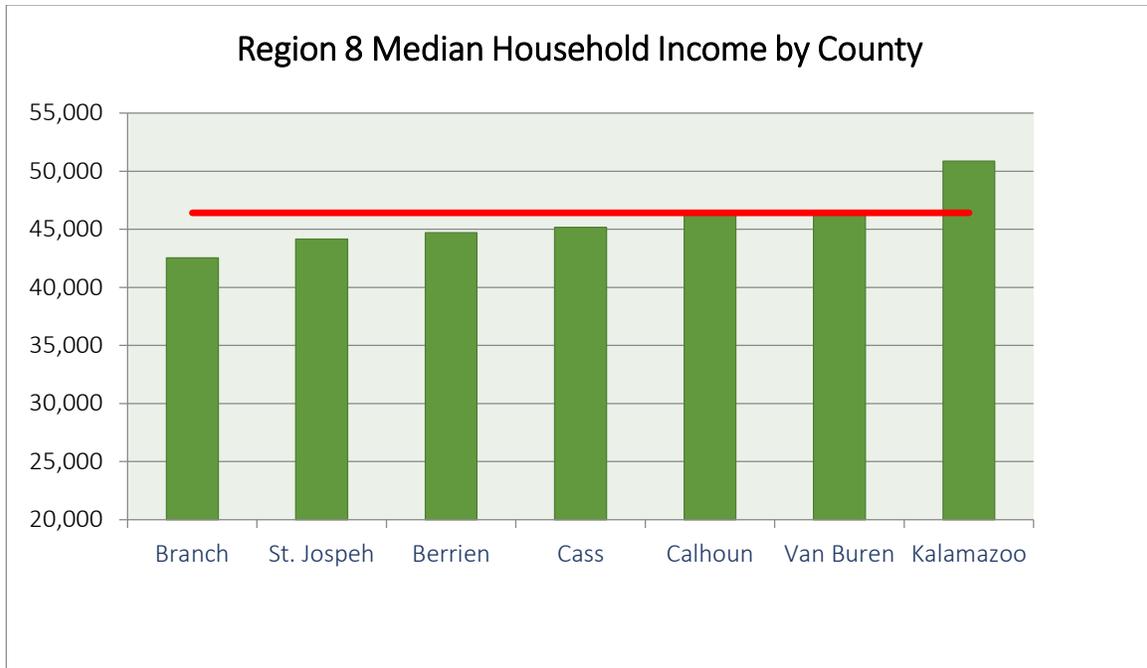
Data Source: 2010-2014 American Community Survey 5-Year Estimates

Age & Disability

Seniors comprised 15 percent of Region 8’s population, with a total of 117,063 persons aged 65 and over. Cass County had the highest proportion of seniors at 17.8 percent. Kalamazoo County had the lowest proportion of seniors at 14.48 percent. Approximately 13.8 percent of the regional population had a disability – 83,304 persons. Cass County had the highest proportion of disabled persons at 15.2 percent and Kalamazoo County had the lowest proportion of disabled persons at 12.8 percent (2010-2014 ACS).

Median Household Income

The median household income (MHI) in the region was \$46,413, however the MHI varied widely among the counties – with four of the seven counties below the regional MHI. Kalamazoo County had the highest MHI at \$50,864, while Branch County had the lowest MHI at \$42,538.



Data Source: 2010-2014 American Community Survey 5-Year Estimates

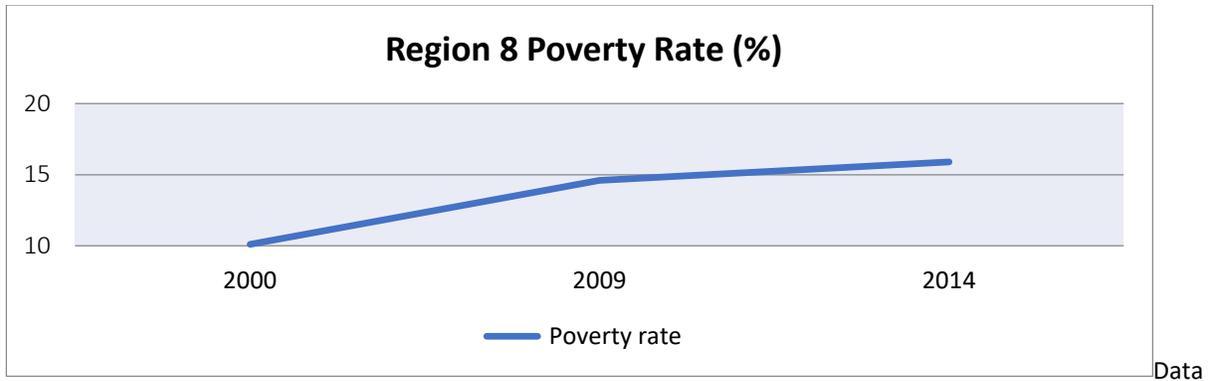
Data Note: The red line represents the regional median household income of \$46,413

Affordability & Housing

HUD defines housing cost burden as when a household spends more than 30 percent of monthly income on housing related costs. Fifty-two percent of renters in Region 8 (26,824 households) were cost burdened according to 2010-2014 ACS estimates. Amongst homeowners, 30 percent of owners with a mortgage (32,686 households) and 14.3 percent of owners without a mortgage (9,190 households) were housing cost burdened. Homeowners without mortgages who are cost burdened are often households on fixed incomes (such as the elderly) that pay an inordinate amount of their monthly income on taxes, insurance, and other housing related costs.

Poverty

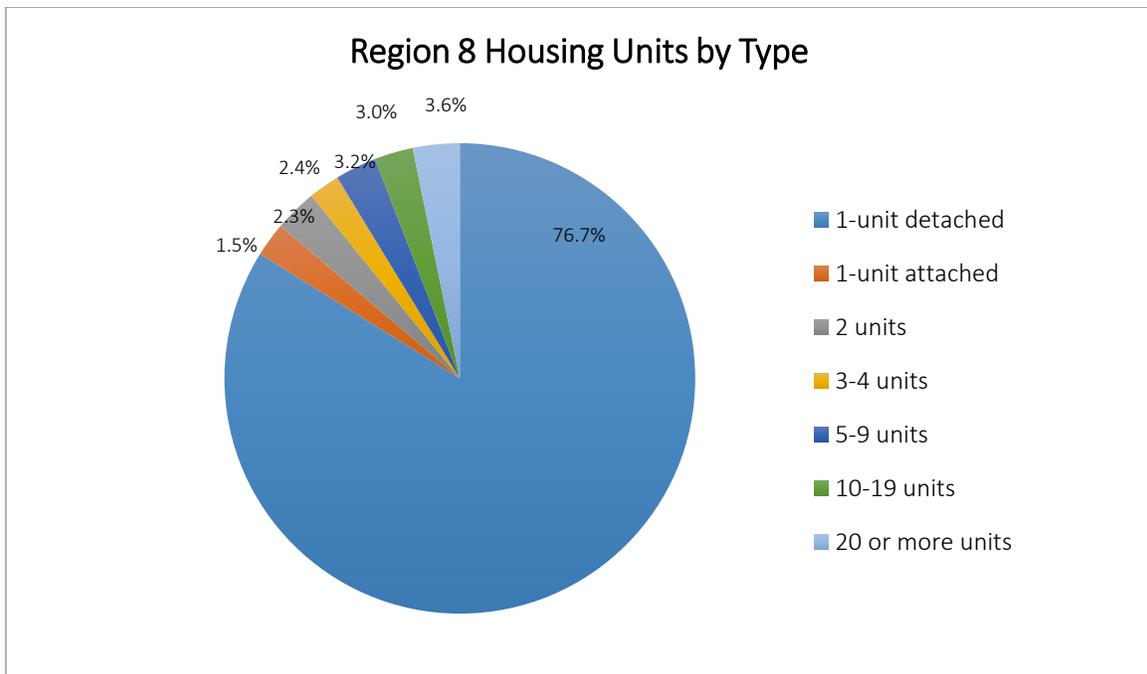
An additional indicator of financial strife is poverty. There were 96,344 persons living below the poverty line in Region 8, according to 2010-2014 ACS estimates – 15.9 percent of the regional population. That represents a 58.6 percent poverty rate increase from 2000. Kalamazoo County experienced the lowest poverty rate at 13.6 percent (18,015 persons), and Van Buren County experienced the highest poverty rate at 19.2 percent (14,326 persons).



Source: Census 2000, 2005-2009 ACS 5-Yr Est., 2010-2014 ACS 5-Year Est.

Housing Stock

There were 281,766 housing units in Region 8 according to 2014 ACS 5-Year Estimates – with Berrien County having the highest number of housing units with 76,810 units and Branch County having the least amount with 20,682 housing units. A 1-unit detached structure was by far the most prominent unit type in the region with 76.7 percent of the units (216,042 units) followed by 20 or more units with 3.6 percent (10,072 units).

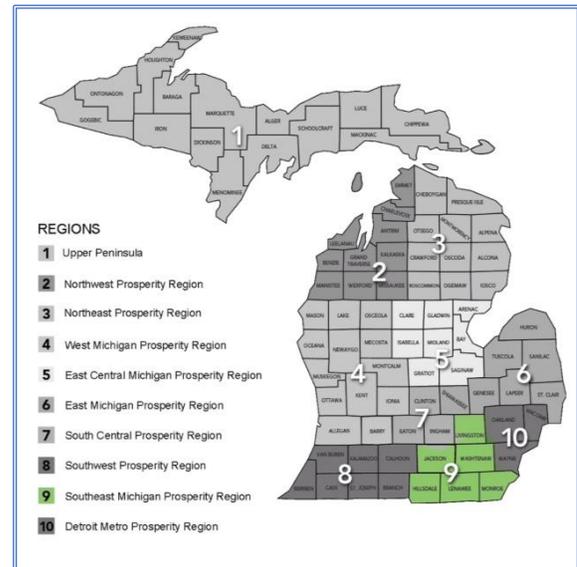


Data Source: 2010-2014 ACS 5-Year Estimates (Chart does not factor in Mobile Homes or Boat/RV/Van)

Region 9 – Southeast Prosperity Region

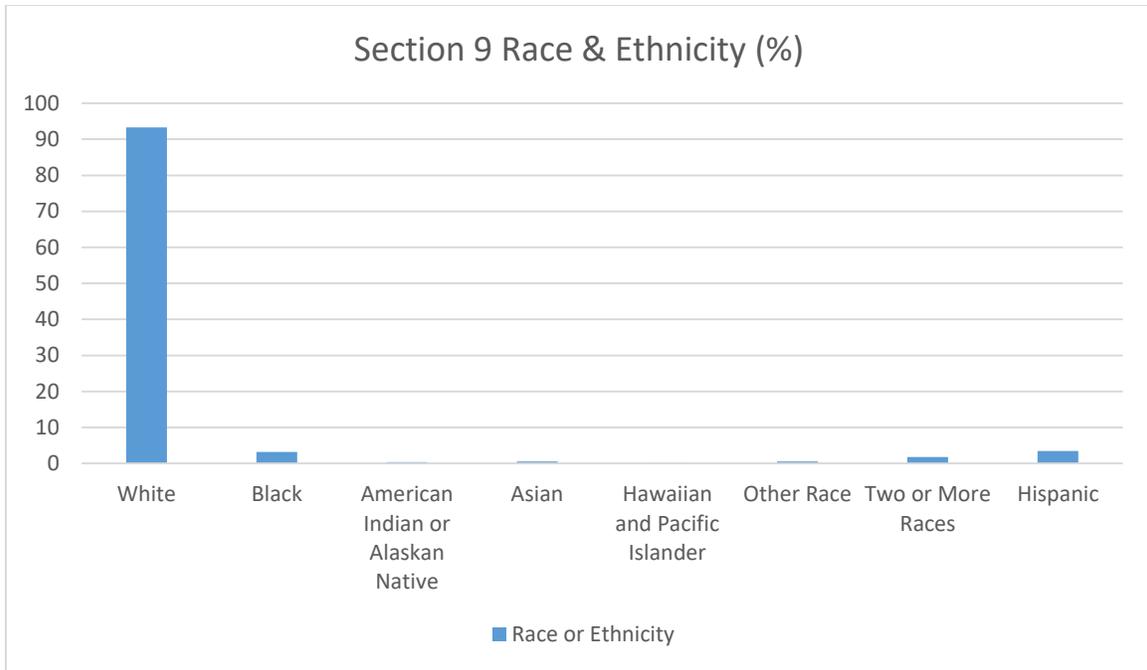
The Region 9 consists of the following 5 counties: Hillsdale, Jackson, Lenawee, Livingston, and Monroe.

Note that Washtenaw County is entirely excluded as it and Ann Arbor both receive direct CDBG funding. No other entitlement cities surpassed the threshold for removal under the methodology for this report. The 5 non-entitlement counties comprising Region 9 experienced a net population increase of 5.4 percent between 2000 and 2014 – increasing from a cumulative population of 606,735 to 643,687 (2000 Census, 2010-2014 ACS). However, the increase in population only occurred between the years 2000 and 2009. Between 2009 and 2014 the region saw a population decrease of 0.6 percent. A majority of counties in Region 9 experienced an increase of population over the 14-year time period, while only one county held having a decrease in population. Hillsdale County saw a decline in population at 0.5 percent. Monroe County and Livingston County saw the largest growth in population. Monroe increased 3.4 percent and Livingston County increased 16.8 percent.



Race and Ethnicity

Region 9 is predominantly White, with the race group accounting for 93.3 percent of regional population and all remaining racial groups making up the remaining 6.7 percent. Blacks/African Americans are the second largest racial group and account for 3.2 percent of the population. All other racial groups made up less than one percent of the population. Finally, 3.5 percent of the region identify as ethnically Hispanic (individuals can identify as Hispanic and another race).



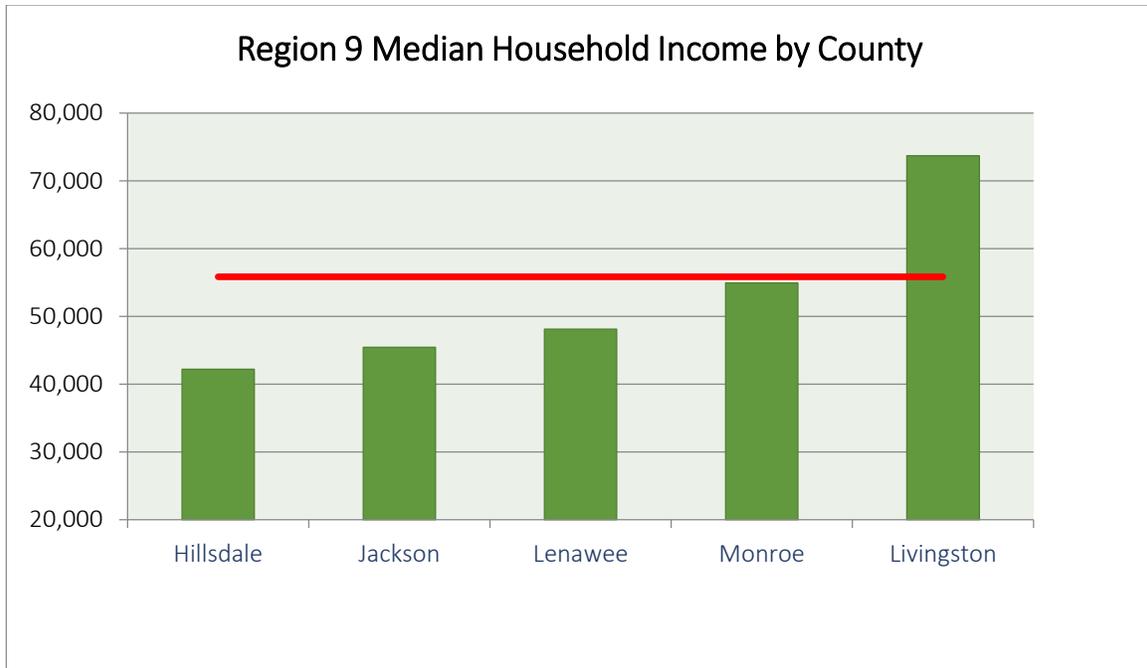
Data Source: 2010-2014 American Community Survey 5-Year Estimates

Age & Disability

Seniors comprised 14.6 percent of Region 9’s population, with a total of 93,667 persons aged 65 and over. Hillsdale County had the highest proportion of seniors at 16.6 percent. Livingston County had the lowest proportion of seniors at 13.4 percent. Approximately 12.7 percent of the regional population had a disability – 81,264 persons. Jackson County had the highest proportion of disabled persons at 15.2 percent and Livingston County had the lowest proportion of disabled persons at 9.5 percent (2010-2014 ACS).

Median Household Income

The median household income (MHI) in the region was \$55,854, however the MHI varied widely among the counties – with four of the five counties below the regional MHI. Livingston County was the only county with an MHI greater than the regional MHI \$73,694, while Hillsdale County had the lowest MHI at \$42,183.



Data Source: 2010-2014 American Community Survey 5-Year Estimates

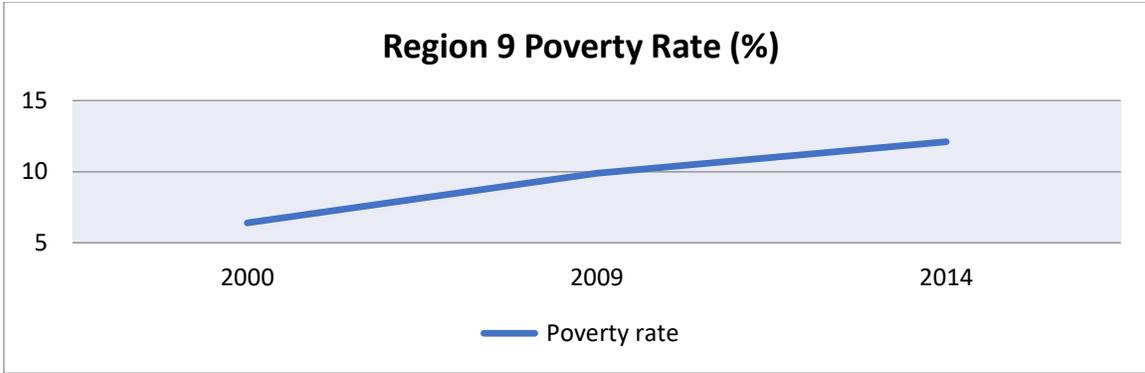
Data Note: The red line represents the regional median household income of \$55,854

Affordability & Housing

HUD defines housing cost burden as when a household spends more than 30 percent of monthly income on housing related costs. Fifty-two percent of renters in Region 8 (24,210 households) were cost burdened according to 2010-2014 ACS estimates. Amongst homeowners, 31.1 percent of owners with a mortgage (39,760 households) and 14.1 percent of owners without a mortgage (8,688 households) were housing cost burdened. Homeowners without mortgages who are cost burdened are often households on fixed incomes (such as the elderly) that pay an inordinate amount of their monthly income on taxes, insurance, and other housing related costs.

Poverty

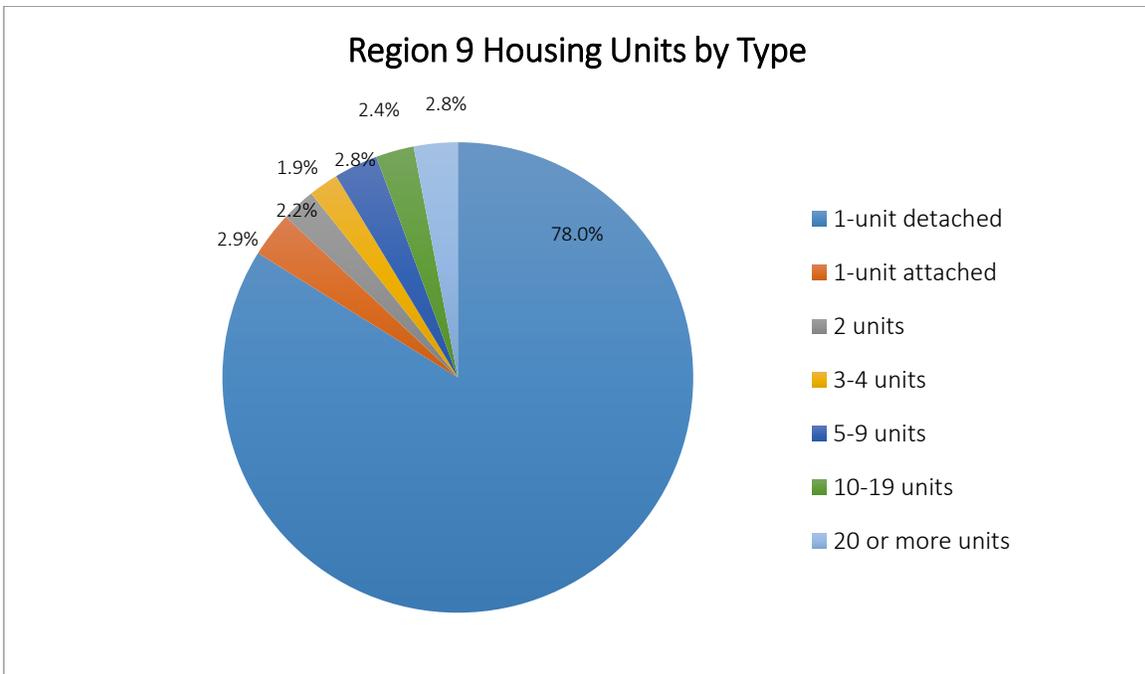
An additional indicator of financial strife is poverty. There were 77,477 persons living below the poverty line in Region 9, according to 2010-2014 ACS estimates – 12.1 percent of the regional population. That represents a 99 percent poverty rate increase from 2000. Livingston County experienced the lowest poverty rate at 6.0 percent (10,982 persons), and Hillsdale County experienced the highest poverty rate at 20.1 percent (9,033 persons).



Data Source: Census 2000, 2005-2009 ACS 5-Yr Est., 2010-2014 ACS 5-Year Est.

Housing Stock

There were 270,908 housing units in Region 9 according to 2014 ACS 5-Year Estimates – with Livingston County having the highest number of housing units with 73,359 units and Hillsdale County having the least amount with 21,689 housing units. A 1-unit detached structure was by far the most prominent unit type in the region with 78 percent of the units (211,189 units) followed by 1-unit attached units with 2.9 percent (7,796 units).



Data Source: 2010-2014 ACS 5-Year Estimates (Chart does not factor in Mobile Homes or Boat/RV/Van)

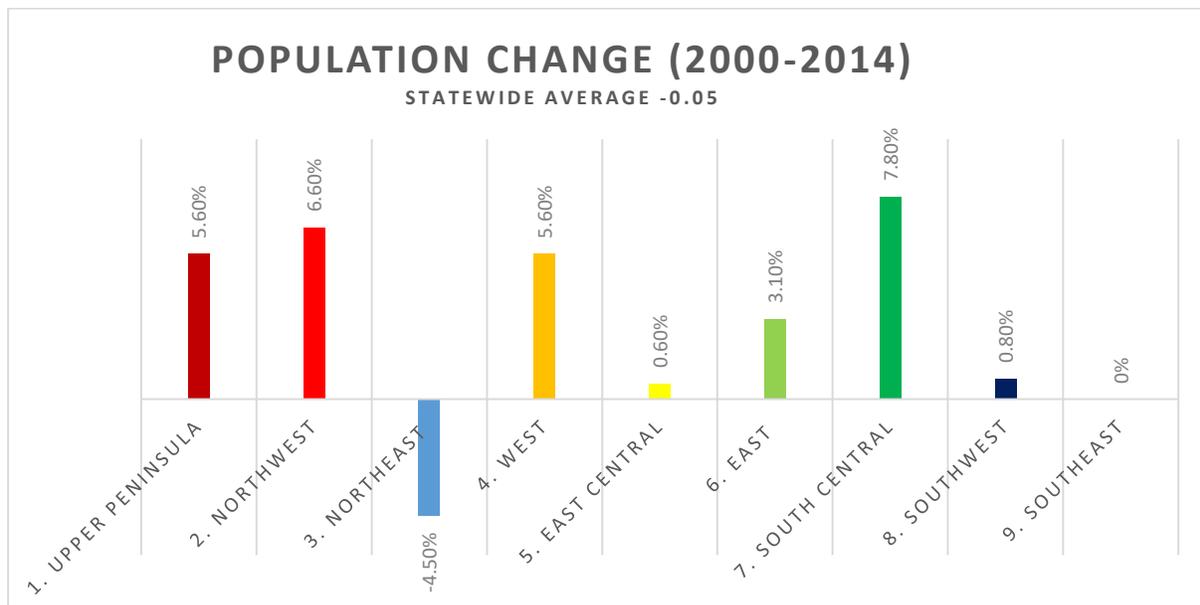
Regional Summary



This section provides a summary and comparison of the individual regional analyses discussed above.

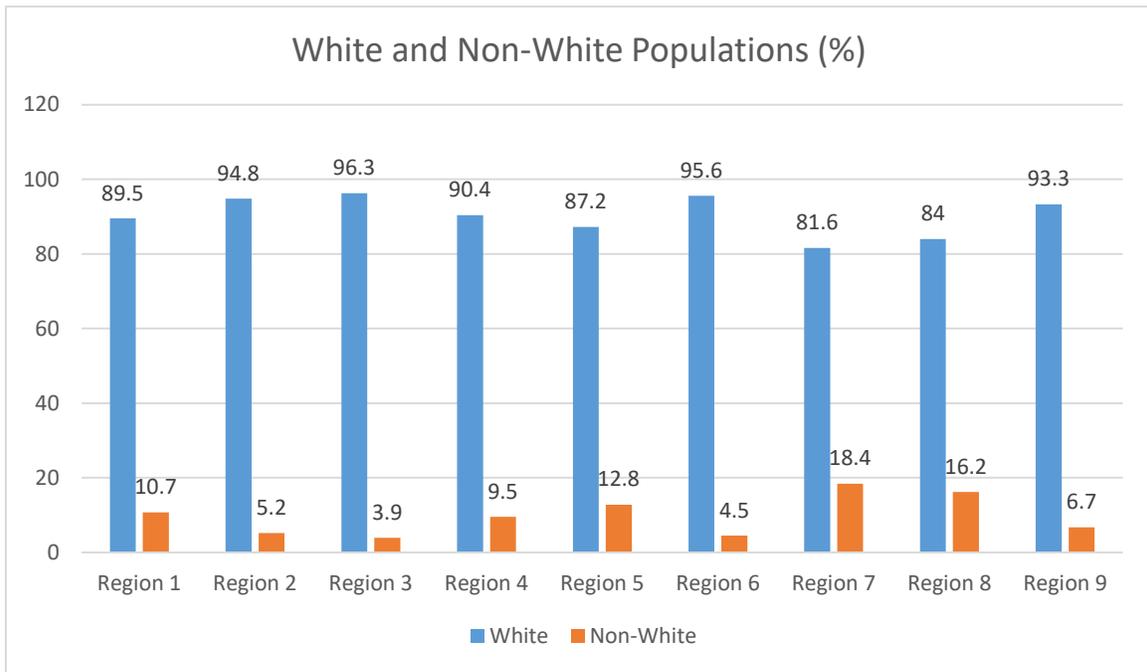
Population

Michigan’s population has decreased by 0.5 percent since 2000 and some regions have absorbed the impact of this decrease more than others. As shown in the chart below, Region 3 has experienced a 4.5 percent population decrease since 2000. In other regions, there have been no growth (Region 9) or growth at less than one percent (Region 5 and 8). Regions 7 and 2 had the greatest population growth at 7.8 percent and 6.6 percent respectively.



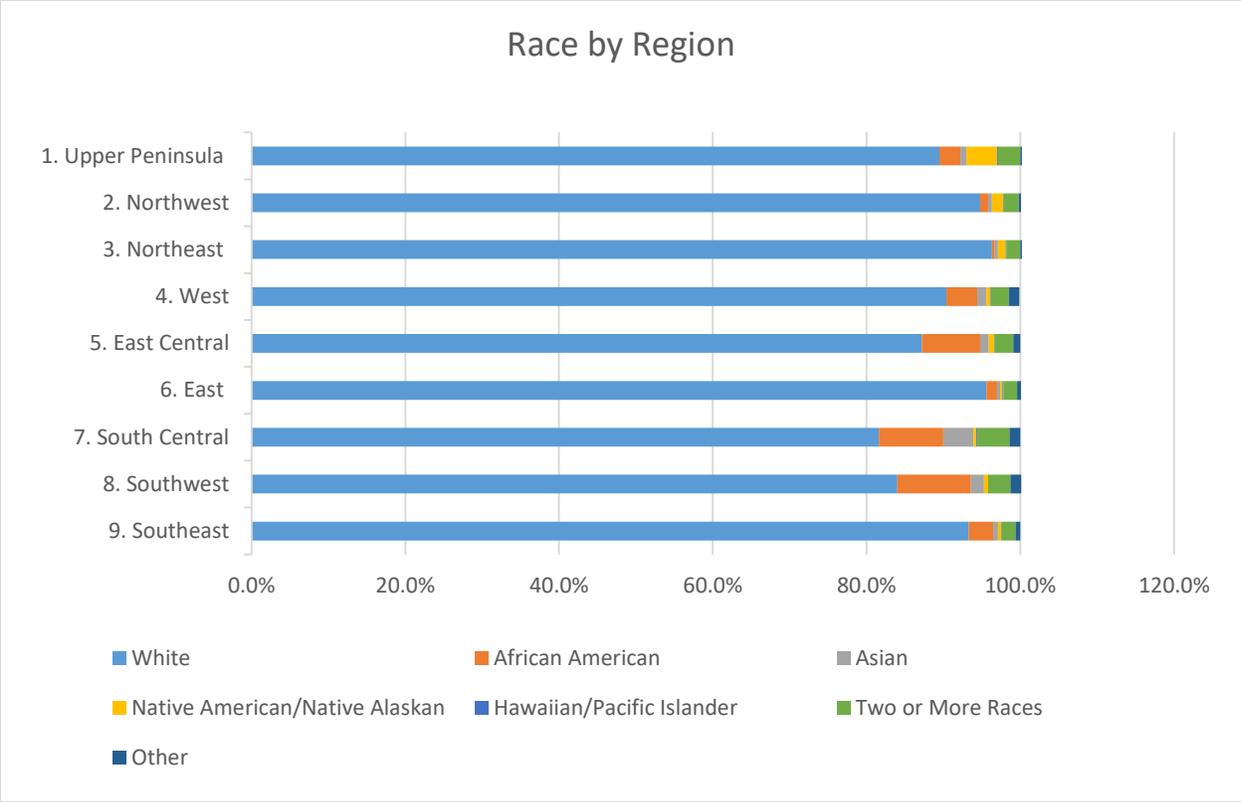
Race and Ethnicity

Michigan is overall predominantly White, but there is considerable race and ethnic variation between Regions. The following two charts visualize Race and Ethnic demographics within Michigan by region. The first compares White and Non-White populations. Region 7 has the highest Non-White Population with 18.4 percent and Region 3 has the lowest Non-White population with 3.9 percent. Data Note: Due to rounding estimates the totals do not always equal 100 percent.



Data Source: 2010-2014 American Community Survey 5-Year Estimates

The second chart breaks down the Non-White population by region. In Regions 8, 7, and 5, the Black or African-American population is the most prominent minority population. In Regions 2, 6, 9, and 4, the Hispanic population is most prominent. In Region 3, more people identify as 2 or More races than any other Non-White group and in Region 1 the largest group is Native American or Alaskan. Following the chart there is a table which includes all of the data discussed in this section.



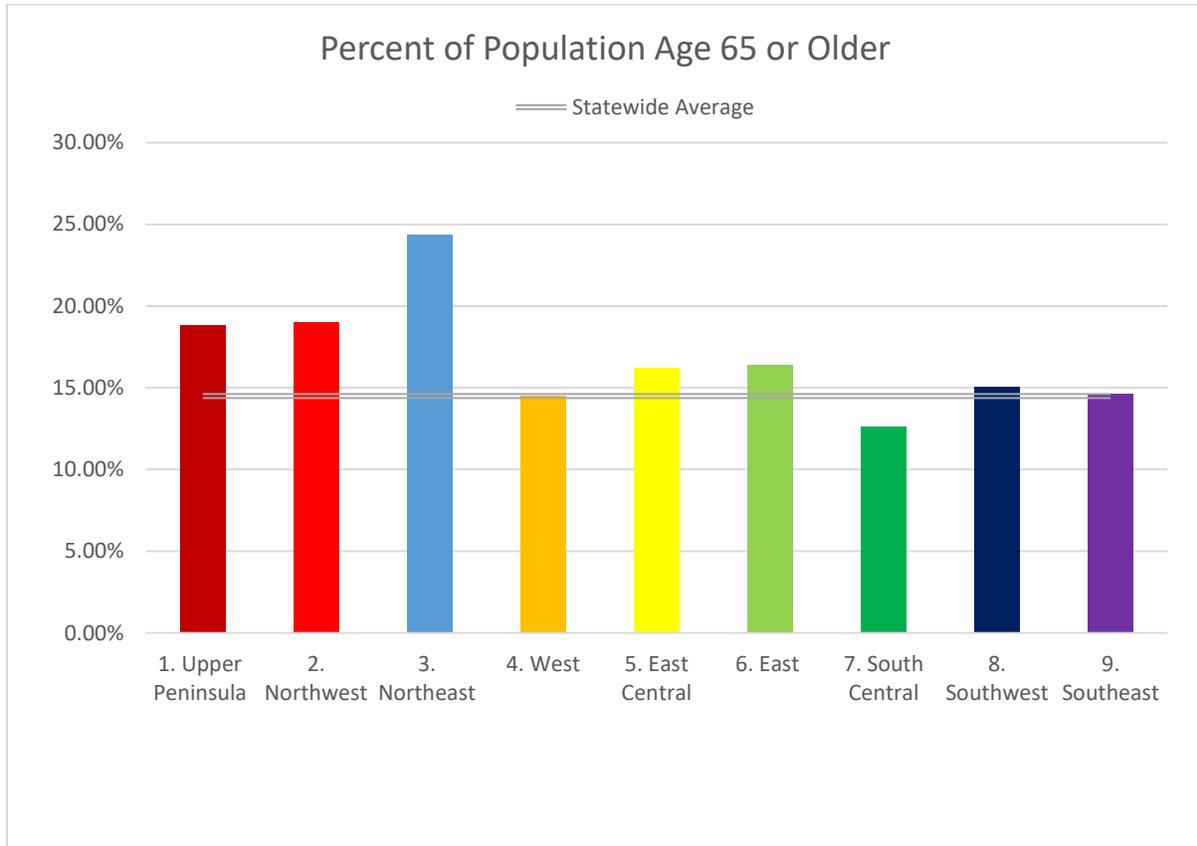
Data Source: 2010-2014 American Community Survey 5-Year Estimates

TABLE: Race & Ethnicity by Region									
	White	Non-White	Non-White						
			Black	Hawaiian and Pacific Islander	Native American or Alaskan Native	Asian	Other Race	Two or More Races	Hispanic
Region 1	89.5	10.7	2.7	0.1	4.0	0.8	0.2	2.9	1.3
Region 2	94.8	5.2	1.0	0.1	1.5	0.5	0.3	1.9	2.1
Region 3	96.3	3.9	0.4	0.1	1.0	0.4	0.2	1.8	1.3
Region 4	90.4	9.5	4.0	0.1	0.5	1.2	1.4	2.3	6.1
Region 5	87.2	12.8	7.6	0.1	0.7	1.1	0.9	2.4	5.0
Region 6	95.6	4.5	1.4	0.1	0.3	0.4	0.5	1.8	3.2
Region 7	81.6	18.4	8.4	0.1	0.4	3.9	1.4	4.2	6.3
Region 8	84.0	16.2	9.6	0.1	0.5	1.7	1.4	2.9	5.2
Region 9	93.3	6.7	3.2	0.1	0.4	0.6	0.6	1.8	3.5

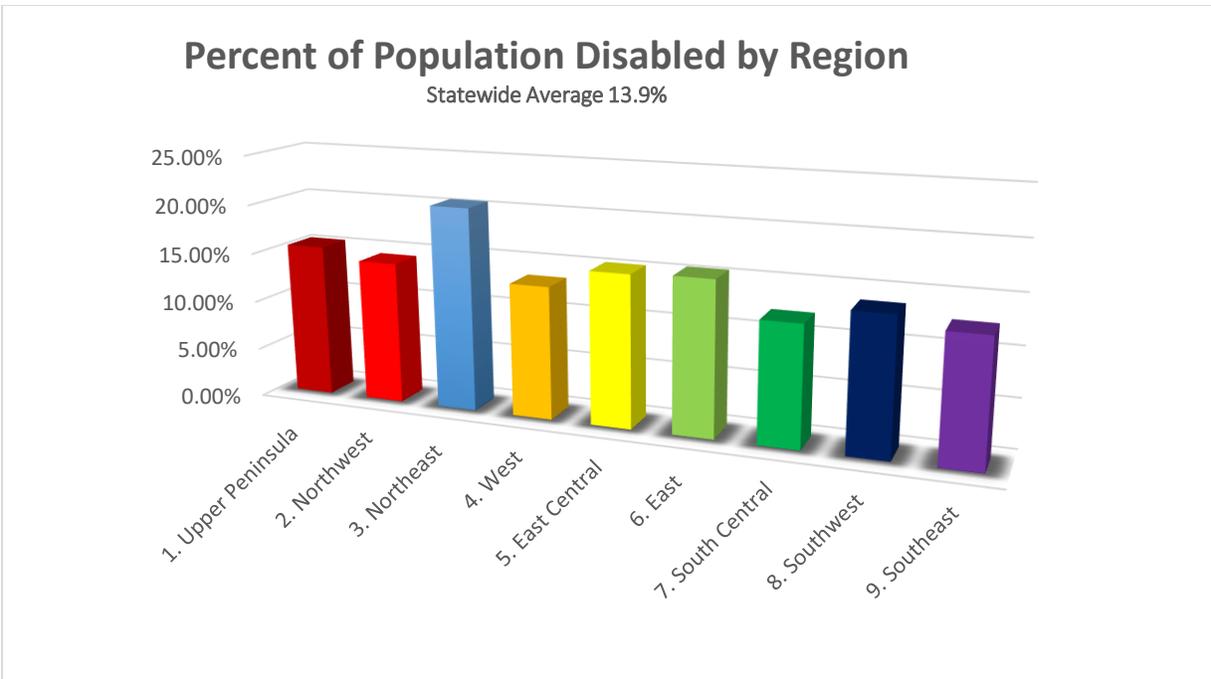
Source: 2010-2014 American Community Survey 5-Year Estimates

Age & Disability

Two populations that generally need additional support are seniors and the disabled. The relative size of these important populations varies depending on the region. Seniors comprised 14.5 percent of Michigan's population. The following chart displays the senior population across the Regions. The population of Region 3 is almost 25 percent over the age of 65, which is the highest rate in Michigan by far. The lowest rate is in Region 7 with 12.59 percent.

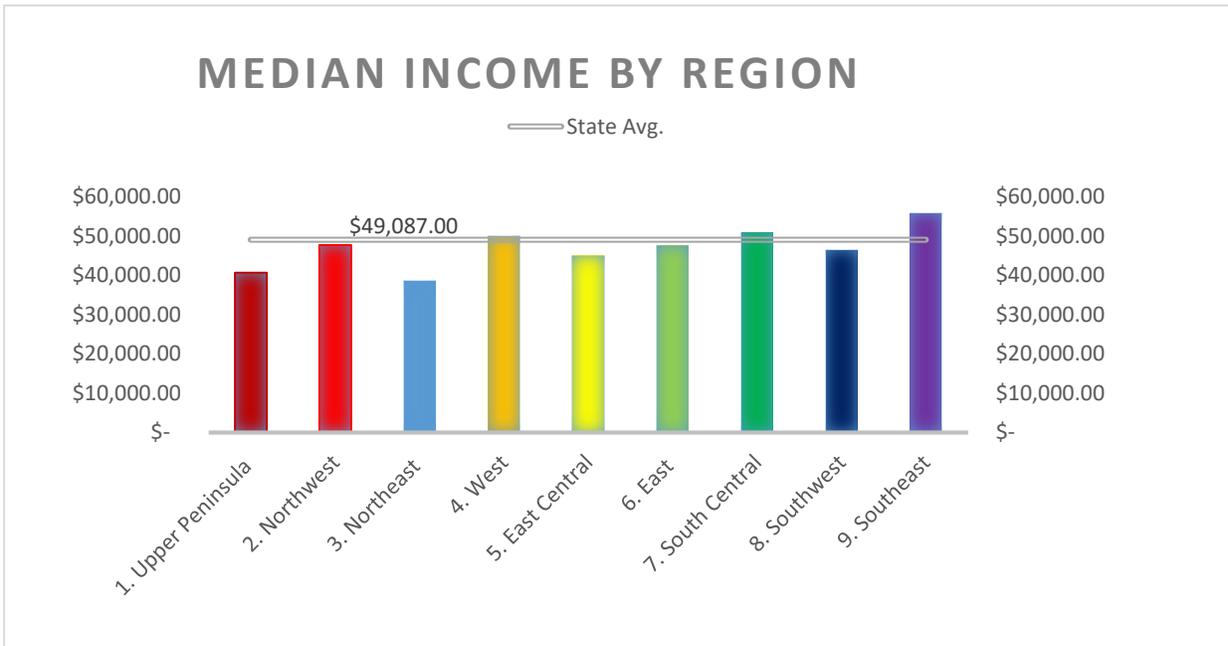


In Michigan, 13.9 percent of the population has some form of disability. Region 3 has the highest disability rate with 20.59 percent and the lowest is in Region 7 with 12.15 percent. Unsurprisingly, Regions with a higher elderly population also tend to have a higher population with a disability.



Median Household Income

The median household income (MHI) in Michigan is \$49,087, however the MHI varied widely among the regions – with seven of the nine regions below the state MHI. Region 9 had the highest MHI with \$55,854 and Region 3 had the lowest with \$38,538.

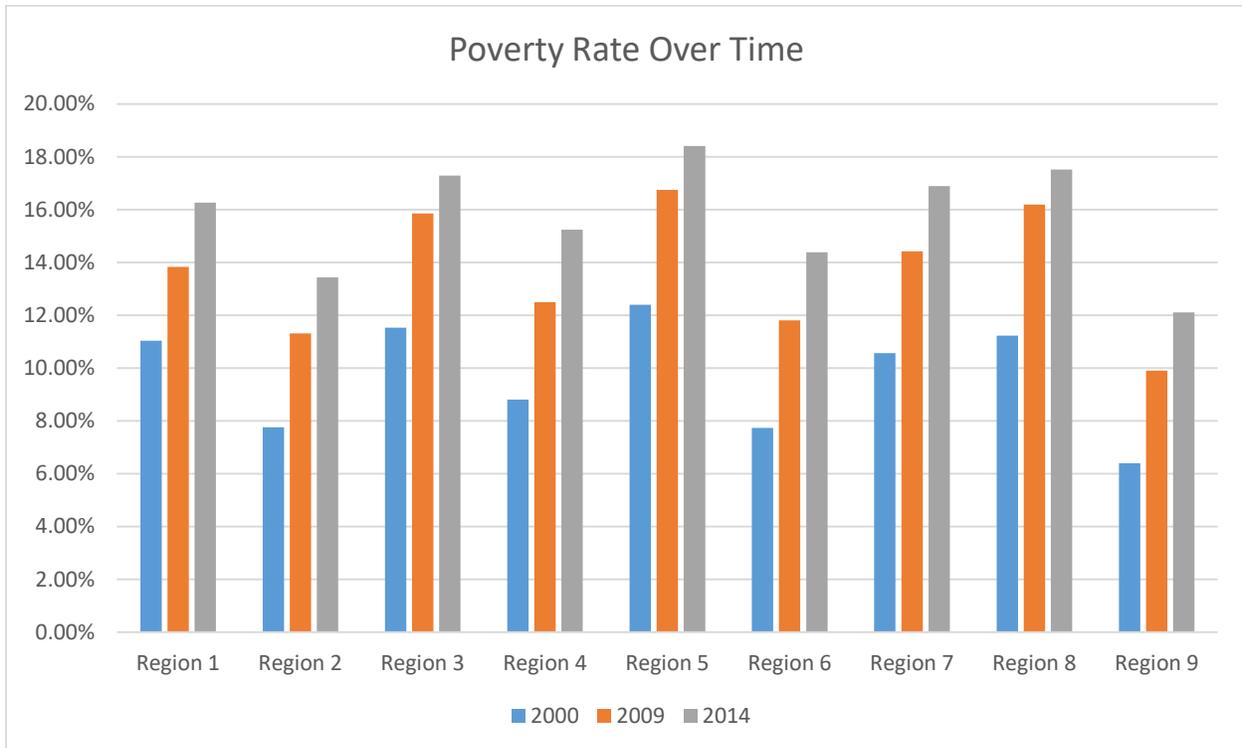


Data Source: 2010-2014 American Community Survey 5-Year Estimates

Data Note: The line represents the statewide median household income of \$49,087

Poverty

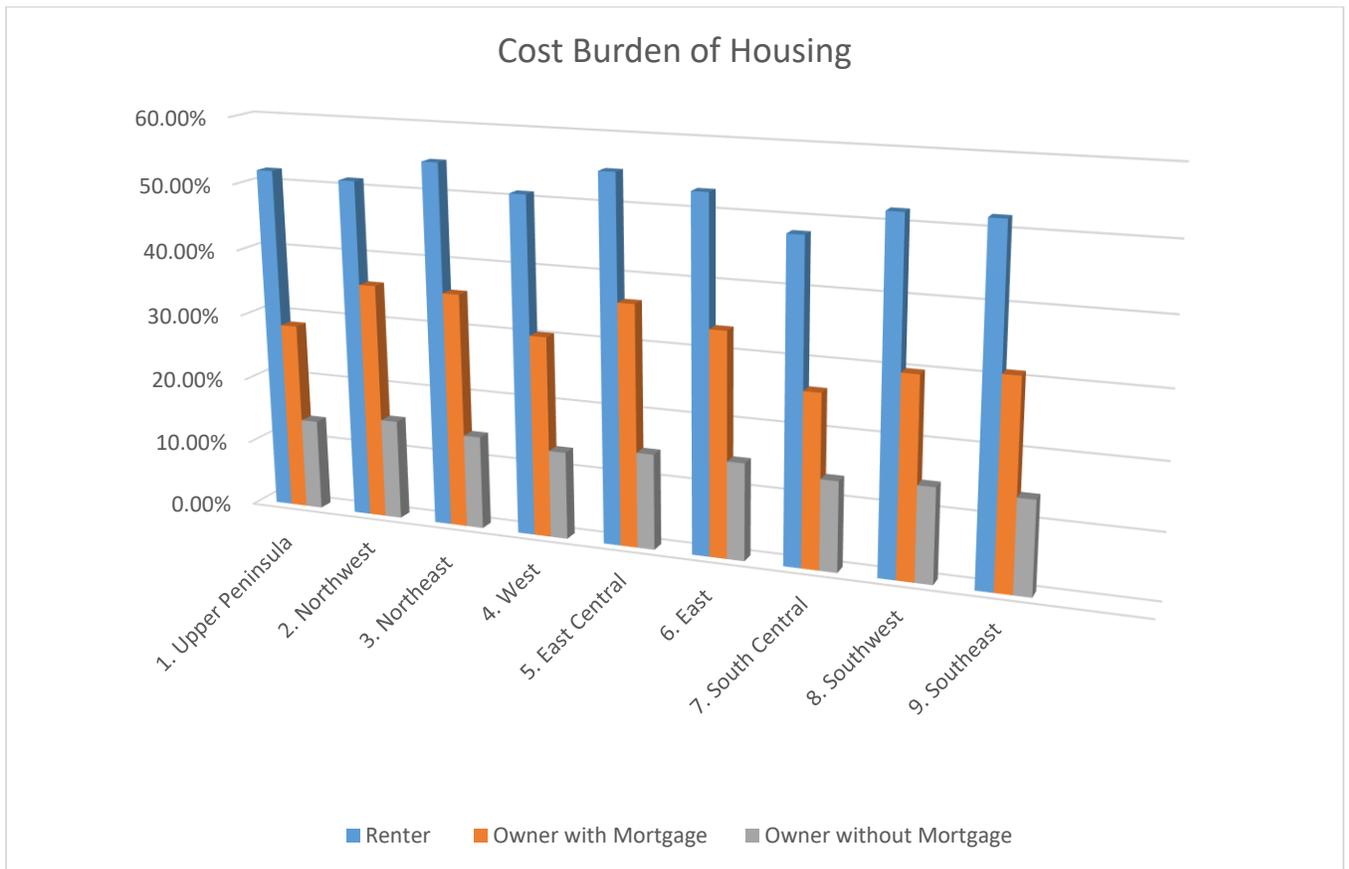
An additional indicator of financial strife is poverty. The poverty rate in Michigan was 16.9 percent in 2014. This amounts to over 725,000 people below the poverty line. The following table breaks the poverty rate down by Region and shows the change since 2000. Region 9 maintained the lowest poverty rate in Michigan with 6.4 percent in 2000 and 12.11 percent in 2014. Region 5 has maintained the highest poverty rate in Michigan with 12.4 percent in 2000 and 18.41 percent in 2014.



Data Source: Census 2000, 2005-2009 ACS 5-Yr Est., 2010-2014 ACS 5-Year Est.

Housing Cost Burden

In all regions of the analysis more than half of all renters experience housing cost burden except for Region 7, where 48 percent of renters are cost burdened. Regions 3 and 5 have the highest housing cost burden for renters with about 55% of all renters experiencing cost burden. Regions 2, 3, and 5 have the highest percentages of owners with mortgages experiencing cost burden at about 36 percent. As shown in the chart below, across the regions, renters are cost burdened at significantly higher percentages than owners with mortgages. Renters experience housing cost burden between 43 percent and 83 percent more than owners with mortgages. Region 1 and 8 have renters faring worse than owners at the greatest rates with renter housing cost burden at 52 percent while cost burden for owners with mortgages is around 29 percent.



VI. Laws, Policies and Furthering Fair Housing

Overview of Federal Fair Housing Laws and Executive Orders

Both federal and state fair housing laws establish protected classes, govern the treatment of these individuals, and are designed to affirmatively further access to housing and community development resources to members of protected classes. This section provides an overview of these laws.

Title VI of the Civil Rights Act of 1964: Prohibits discrimination on the basis of race, color or national origin in programs and activities receiving federal financial assistance.

Title VIII of the Civil Rights Act of 1968 (Fair Housing Act) and as amended 1988: Prohibits discrimination in the sale, rental and financing of dwellings, and in other housing-related transactions, based on:

- Race;
- Color;
- National origin;
- Religion;
- Sex;
- Familial status (including children under the age of eighteen living with parents or legal custodians, pregnant women and people securing custody of children under the age of eighteen, or discrimination based on age); and
- Persons with physical, mental, and developmental disabilities.

Specifically, in the sale and rental of housing no one may take any of the following actions based on these protected classes:

- Refuse to rent or sell housing;
- Refuse to negotiate for housing;
- Make housing unavailable;
- Deny a dwelling;
- Set different terms, conditions, or privileges for sale or rental of a dwelling;
- Provide different housing services or facilities;
- Falsely deny that housing is available for inspection, sale, or rental;
- For profit, persuade owners to sell or rent (blockbusting);
- Deny anyone access to or membership in a facility or service (such as multiple listing service) related to the sale or rental of housing;
- Refuse to allow reasonable modifications to dwelling or common use areas, at the expense of the renter or owner, if necessary, for a person living with disabilities to use the housing; or
- Refuse to make reasonable accommodations in rules, policies, practices, or services if necessary for the disabled person to use the housing.

In Mortgage Lending: No one may take any of the following actions based on these protected classes:

- Refuse to make a mortgage loan;
- Refuse to provide information regarding loans;
- Impose different terms or conditions on a loan, such as different interest rates, points, or fees;
- Discriminate in appraising property;
- Refuse to purchase a loan; or
- Set different terms or conditions for purchasing a loan.

In addition, it is illegal for anyone to:

- Threaten, coerce, intimidate, or interfere with anyone exercising a fair housing right or assisting others who exercise that right; or
- Advertise or make any statement that indicates a limitation or preference based on race, color, national origin, religion, sex, familial status, or handicap. This prohibition against discriminatory advertising applies to single-family and owner-occupied housing that is otherwise exempt from the Fair Housing Act.

Section 504 of the Rehabilitation Act of 1973: Prohibits discrimination based on disability in any program or activity receiving federal financial assistance.

Section 109 of Title I of the Housing and Community Development Act of 1974: Prohibits discrimination on the basis of race, color, national origin, sex, or religion in programs or activities receiving financial assistance from HUD's Community Development Block Grant Program. Sections 104(b) and 106 (d) (5) specifically require CDBG Program grantees to certify that they will affirmatively further fair housing. This requirement was also included in Section 105 (c) (13) of the National Affordable Housing Act of 1990.

Title II of the Americans with Disabilities Act of 1990: Prohibits discrimination based on disabilities, services, or activities provided or made available by public entities. HUD enforces Title II when it relates to state and local public housing, housing assistance, and housing referrals.

Architectural Barriers Act of 1968: Requires that buildings and facilities designed, constructed, altered or leased with certain federal funds after September 1969 must be accessible to, and usable by, handicapped persons.

Age Discrimination Act of 1975: Prohibits discrimination on the basis of age in programs or activities receiving federal financial assistance.

Equal Credit Opportunity Act of 1974: Prohibits discrimination in lending based on race, color, religion, national origin, sex, marital status, age, receipt of public assistance or the exercise of any right under the Consumer Credit Protection Act.

Community Reinvestment Act (CRA) of 1977: According to the Federal Office of the Comptroller of the Currency, the CRA provides a framework for financial institutions, state and local governments and community organizations to jointly promote banking services to all members of a community. The CRA:

- Prohibits redlining (denying or increasing the cost of banking to residents of racially defined

neighborhoods); and

- Encourages efforts to meet the credit needs of all community members, including residents of low- and moderate-income neighborhoods.

The Community Reinvestment Act (CRA) provides that “regulated financial institutions have continuing and affirmative obligations to help meet the credit needs of the local communities in which they are chartered.” CRA establishes federal regulatory procedures for monitoring the level of lending, investments and services in low- and moderate-income neighborhoods defined as underserved by lending institutions. CRA creates an obligation for depository institutions to serve the entire community from which its deposits are garnered, including low- and moderate-income neighborhoods.

Home Mortgage Disclosure Act (HMDA) of 1975: Requires banks, savings and loan associations and other financial institutions to publicly report detailed data on their home lending activity. Under HMDA, lenders are required to publicly disclose the number of loan applications by census tract, income, race and gender of the borrower, the type of loan and the number and dollar amount of loans made. Starting in 1993, independent mortgage companies were also required to report HMDA data. HMDA creates a significant and publicly available tool by which mortgage-lending activity in communities can be assessed. HMDA data can be analyzed to determine bank performance and borrower choices.

Executive Order 11063: Prohibits discrimination in the sale, leasing, rental, or other disposition of properties and facilities owned or operated by the federal government or provided with federal funds.

Executive Order 12892 (as amended): Requires federal agencies to affirmatively further fair housing in their programs and activities and provides that the Secretary of HUD will be responsible for coordinating the effort. The Order also establishes the President’s Fair Housing Council, chaired by the Secretary of HUD.

Executive Order 12898: Requires each federal agency conduct its program, policies and activities that substantially affect human health or the environment in a manner that does not exclude persons based on race, color, or national origin.

Executive Order 13166: Eliminates, to the extent possible, limited English proficiency as a barrier to full and meaningful participation by beneficiaries in all federally assisted and federally conducted programs and activities.

Executive Order 13217: Requires federal agencies to evaluate their policies and programs to determine if any can be revised or modified to improve the availability of community-based living arrangements for persons with disabilities.

Equal Access Rule (24 CFR 5.105(a)(2) and 5.106): Under 24 CFR 5.105(a)(2), the regulations provide protections for HUD-assisted or insured housing (including local housing programs funded with CDBG, HOME, etc., whether run by grantees or subrecipients) on the basis of gender identify, sexual orientation, and marital status and generally prohibits owners and program administrators from making inquiry about such characteristics. Further, 24 CFR 5.106 specifically requires providers to establish, amend, or maintain program admissions, occupancy, and operating policies and procedures (including policies and procedures

to protect individuals' privacy and security), so that equal access is provided to individuals based on their gender identity. This requirement includes tenant selection and admission preferences. Such policies must ensure that an individual is placed, served, and accommodated in accordance with the individual's gender identity and not subjected to intrusive questioning or asked to provide anatomical information or documentation to evidence the individual's gender.

Review of State Statutes, Policies, and Plans

TDA Consulting, Inc. conducted a review of Michigan's statutes, rules and plans that have or might have an impact on fair housing choice. This section provides a limited overview of these statutes, policies, and/or plans.

Michigan Elliott-Larsen Civil Rights Act (also known as **Public Act 453 of 1976**), Effective March 31, 1977, the Elliott-Larsen Civil Rights Act prohibits discrimination on the basis of religion, race, color, national origin, age, sex, height, weight, familial status, or marital status in employment, housing, education, and access to public accommodations.

Michigan Persons with Disabilities Civil Rights Act (also known as **Public Act 220 of 1976**) Effective March 31, 1977, the Persons with Disabilities Civil Rights Act guarantees the opportunity to obtain employment, housing, and other real estate and full and equal utilization of public accommodations, public services, and educational facilities without discrimination because of a disability. The Persons with Disabilities Civil Rights Act provides additional rights for persons with disabilities to request and obtain reasonable accommodations.

Various local jurisdictions have also adopted additional civil rights protections by local ordinance, including related to housing, that identify additional protected classes. While no comprehensive list of such local ordinances exists—and in some cases local ordinances have been repealed or modified—a Michigan Department of Civil Rights (MDCR) *Report on LGBT Inclusion Under Michigan Law*²⁰ identified, as of August 2012, 19 cities and two townships with local ordinances prohibiting discrimination (including in housing) on the basis of sexual orientation and/or gender identity. Many of these also provide protection on other statuses such as student status or source of income.

Some local ordinances do not address sexual orientation and/or gender identity but do add protected classes such as source of income. Finally, other local fair housing ordinances only overlap protections already provided under federal or state law.

A selection of such local ordinances includes:

City of Ann Arbor provides protection against discrimination based on arrest record, educational association, family responsibilities, gender expression, gender identity, genetic information, height, HIV

²⁰ https://www.michigan.gov/documents/mdcr/MDCR_Report_on_LGBT_Inclusion_409727_7.pdf

status, national origin, political beliefs, sexual orientation, veteran status, victim of domestic violence or stalking, or weight.

Belding Fair Housing Ordinance provides protections for the following classes: race, color, age, religion, sex, national origin, height, weight, familial status, marital status and handicap in the sale or rental or housing, in the financing of housing, and in the provision of brokerage services. (Not on MDCR list as of August 2012.)

City of Detroit protects against discrimination based upon race, color, religious beliefs, national origin, age, marital status, disability, public benefit status, sex, sexual orientation, or gender identity or expression.

City of East Lansing prohibits discrimination based on age, height, weight, sexual orientation, student status, gender identity or expression, use of adaptive devices or aids, and legal source of income.

City of Grand Rapids Community Relations Commission Ordinance on Housing Discrimination provides protections to the following classes: race, color, creed, religion, national origin, ancestry, age, sex, marital status, familial status, handicapped status, source of lawful income, public assistance recipient status and gender orientation.

City of Grand Rapids Fair Housing Ordinance assures equal opportunity to all persons to live in adequate housing facilities regardless of race, color, religion, ancestry or national origin, age, sex, marital status, familial status, handicapped status, source of lawful income, or public assistance recipient status.

City of Holland Fair Housing Ordinance is a policy of the city in the exercise of its police power for the protection of the public safety, health and general welfare, for the maintenance of business and good government, and for the promotion of the city's trade, commerce and manufacture, to assure equal opportunity to all persons to live in adequate housing facilities, regardless of religion, race, color, national origin, age, sex, marital status, or source of income and to that end to prohibit discrimination in housing.

City of Kentwood Fair Housing Ordinance is designated to be the continuing policy of the City to do those things necessary and proper to secure for all its citizens their right to equal housing opportunities regardless of their race, creed, color, sex, marital status, religious belief, age, height, weight, national origin, disability or source of income.

City of Lansing prohibits discrimination against any person because of irrelevant characteristics, including actual or perceived race, religion, ancestry, national origin, color, sex, age, height, weight, student status, marital status, familial status, veteran status, political affiliation or belief, sexual orientation, gender identity or expression, mental or physical limitation, or source of income.

City of Muskegon Fair Housing Ordinance provides protections for the following protected classes: religion, race, color, national origin, age, sex, marital status, and handicap.

City of Muskegon Heights Fair Housing Ordinance provides protections for religion, race, color, national origin, age, sex, height, weight, familial status, marital status, and handicap status.

Traverse City Fair Housing Ordinance states that no person be denied the equal protection of the laws; nor shall any person be denied the enjoyment of his or her civil rights or be discriminated against because of their actual or perceived race, color, religion, national origin, sex, age, height, weight, marital status, physical or mental disability, family status, sexual orientation, or gender identity.

City of Wyoming Fair Housing Ordinance provides protections to the following classes: race, color, religion, national origin, age, sex, height, weight, handicap, source of income, familial status and marital status.

HUD Office of General Counsel Memorandum

Following the Supreme Court's 2015 affirmation that disparate impacts may be a cause for action under the Fair Housing Act and during the development of this AI, the HUD Office of General Counsel (OGC) released several memoranda on the application of the Fair Housing Act to various policies by private property owners and public entities. In particular, these represent policies that may, on their face, seem neutral while resulting in a disparate impact or discriminatory effect on protected classes. It is likely that additional attention will be paid to these issues and additional guidance may be issued in the future.

HUD Office of General Counsel Memorandum on Criminal History

In April 2016, HUD issued legal guidance from the Office of General Counsel (OGC) regarding the likely violation of the Fair Housing Act when housing providers employ blanket policies in refusing to rent or renew a lease based on an individual's criminal history, because such policies may have a disparate impact on racial minorities.¹⁸ The guidance states, "[b]ecause of widespread racial and ethnic disparities in the U.S. criminal justice system, criminal history-based restrictions on access to housing are likely disproportionately to burden African-Americans and Hispanics."

The guidance states that when a housing provider's seemingly neutral policy or practice has a discriminatory effect, such as restricting access to housing on the basis of criminal history, and has a disparate impact on individuals of a particular race, national origin, or other protected class, the policy or practice is unlawful under the Fair Housing Act if it is not necessary to serve a substantial, legitimate, nondiscriminatory interest of the housing provider, or if the interest could be served by another practice that has a less discriminatory effect.

The guidance states, "bald assertions based on generalization or stereotype that any individual with an arrest or conviction record poses a greater risk than those without such records are not sufficient." Landlords and property managers must be able to prove through reliable evidence that blanket policies actually assist in protecting residents and property.

The guidance also states that a housing provider with policies of excluding people because of a prior arrest without conviction cannot satisfy its burden of showing such a policy is necessary to achieve a "substantial, legitimate, nondiscriminatory interest," since an arrest is not a reliable basis upon which to assess the potential risk to residents or property. In instances when a person has been convicted, the policy must be applied on a case-by-case basis considering the nature and severity of the conviction, what the individual has done since conviction, and how long ago the conviction took place.

OGC Memorandum on Fair Housing Act Protections for Persons with Limited English Proficiency

In September 2016, HUD issued legal guidance discussing how the Fair Housing Act applies to a housing provider's consideration of a person's Limited English Proficiency (LEP), or the person's limited ability to read, write, speak or understand English.

The memorandum clarifies that while people with limited English proficiency are not a protected class under the Fair Housing Act, the Fair Housing Act prohibits discrimination on seven protected bases, including national origin, which is closely linked to the ability to communicate proficiently in English. Housing providers are, therefore, prohibited from using limited English proficiency selectively or as an excuse for intentional housing discrimination. The law also prohibits landlords from using limited English proficiency in a way that causes an unjustified discriminatory effect.

The guidance addresses how various legal approaches, such as discriminatory effects and disparate treatment, apply in Fair Housing Act cases in which a housing-related decision – such as a landlord's refusal to rent or renew a lease – involves a person's limited ability to speak, read, write, or understand English. Discriminatory practices, for example, could include applying a language-related requirement to people of certain races or nationalities; posting advertisements that contain blanket statements, such as "all tenants must speak English;" or immediately turning away applicants who are not fluent in English. Targeting racial or national origin groups for scams related to housing also constitutes intentional discrimination.

A housing provider also violates the Fair Housing Act when the provider's policies or practices have an unjustified discriminatory effect, even when the provider had not intended to discriminate. Determining whether a practice has a discriminatory effect involves a three-step legal evaluation of the statistical evidence of a discriminatory effect; whether the housing provider's policy or practice is necessary to achieve a substantial, legitimate, nondiscriminatory interest; and, if so, whether there is a less discriminatory alternative policy or practice.

OGC Memorandum on Application of Fair Housing Act Standards to the Enforcement of Local Nuisance and Crime-Free Housing Ordinances Against Victims of Domestic Violence, Other Crime Victims, and Others Who Require Police or Emergency Services

In September 2016, HUD issued guidance to explain how the Fair Housing Act applies to ensure that the growing number of local nuisance ordinances and crime-free housing ordinances do not lead to discrimination in violation of the Act.

This memorandum's guidance focuses primarily on the impact these ordinances may have on domestic violence victims, but the Act and the standards apply equally to victims of other crimes and to those in need of emergency services who may be subjected to discrimination prohibited by the Act due to the operation of these ordinances. The guidance further addresses the obligation of HUD-funded recipients to consider the impacts of the ordinances in assessing how they will fulfill their affirmative obligation to further fair housing.

The memorandum describes that a growing number of local governments are enacting a variety of nuisance ordinances that can affect housing in potentially discriminatory ways. These ordinances often label various types of conduct associated with a property—whether the conduct is by a resident, guest or other person—a “nuisance” and require the landlord or homeowner to abate the nuisance under the

threat of a variety of penalties. The conduct defined as a nuisance varies by ordinance and has ranged from conduct affecting the appearance of the property to general prohibitions related to the conduct of a tenant or guest. Nuisance ordinances have included what is characterized by the ordinance as an “excessive” number of calls for emergency police or ambulance services, typically defined as just a few calls within a specified period of time by a tenant, neighbor, or other third party, whether or not directly associated with the property.

In some jurisdictions, an incident of domestic violence is defined as a nuisance without regard to whether the resident is the victim or the perpetrator of the domestic violence. In other jurisdictions, incidents of domestic violence are not specifically defined as nuisances but may still be categorized as such because the ordinance broadly defines nuisance activity as the violation of any federal, state, or local law, or includes conduct such as disturbing the peace, excessive noise, disorderly conduct, or calls for emergency services that exceed a specified number within a given timeframe. Even where ordinances expressly exclude victims of domestic violence or other crimes, victims are still frequently deemed to have committed nuisance conduct because police and other emergency service providers may not log the call as domestic violence, instead categorizing it incorrectly as property damage, disturbing the peace, or another type of nuisance conduct.

The ordinances generally require housing providers either to abate the alleged nuisance or risk penalties, such as fines, loss of their rental permits, condemnation of their properties, and, in some extreme instances, incarceration. Some ordinances may require the housing provider to evict the resident and his or her household after a specified number of alleged nuisance violations—often quite low—within a specific timeframe.

The memorandum explains that the Fair Housing Act prohibits both intentional housing discrimination and housing ordinances, policies or practices that have an unjustified discriminatory effect because of protected characteristics. While the Act does not prohibit local governments from appropriately considering nuisance or criminal conduct when enacting laws related to housing, governments should ensure that such ordinances and related policies or practices do not discriminate in violation of the Fair Housing Act.

Where the enforcement of a nuisance or crime-free ordinance penalizes individuals for use of emergency services or for being a victim of domestic violence or other crime, a local government bears the burden of proving that any discriminatory effect caused by such policy or practice is supported by a legally sufficient justification. Such a determination cannot be based on generalizations or stereotypes. Selective use of nuisance or criminal conduct as a pretext for unequal treatment of individuals based on protected characteristics violates the Act. The memorandum advises that repealing ordinances that deny access to housing by requiring or encouraging evictions or that create disparities in access to emergency services because of a protected characteristic is one step local governments can take to avoid Fair Housing Act violations and as part of a strategy to affirmatively further fair housing.

VII. Fair Housing Complaints

Introduction

Complaints filed under fair housing laws can be useful indicators to identify the type of discrimination that is most common in the State of Michigan and characteristics of households experiencing discrimination in housing. This section uses data collected from the U.S. Department of Housing and Urban Development (HUD) Office of Fair Housing and Equal Opportunity (FHEO), the Michigan Department of Civil Rights (MDCR), and Michigan State Housing Development Authority (MSHDA). The data used for the various tables below were collected by HUD, MDCR, and MSHDA separately over a three-year period from 2013 to 2015. This data will identify the following:

- The number of complaints filed with each organization,
- Complaint closures and outcomes of cases, and
- Areas/regions with higher rates of complaints.

In analyzing this data, several limitations were identified:

- The complaint process relies on self-reporting by those individuals that believe they have experienced discrimination. This does not represent all acts of housing discrimination, as all incidents may not be reported and in many cases individuals may not know they have been discriminated against.
- Larger and denser areas are more likely to have larger numbers of complaints due to larger populations.
- Complaint data may be skewed due to the time between filing and closing a complaint.
- Some duplication may exist across the data sets as complainants may have reported their complaints to more than one agency. Because the name of complainants was not included for confidentiality reasons, TDA was not able to identify possible duplications.

Complaints by Agency

HUD Fair Housing and Equal Opportunity Office (FHEO) Complaints

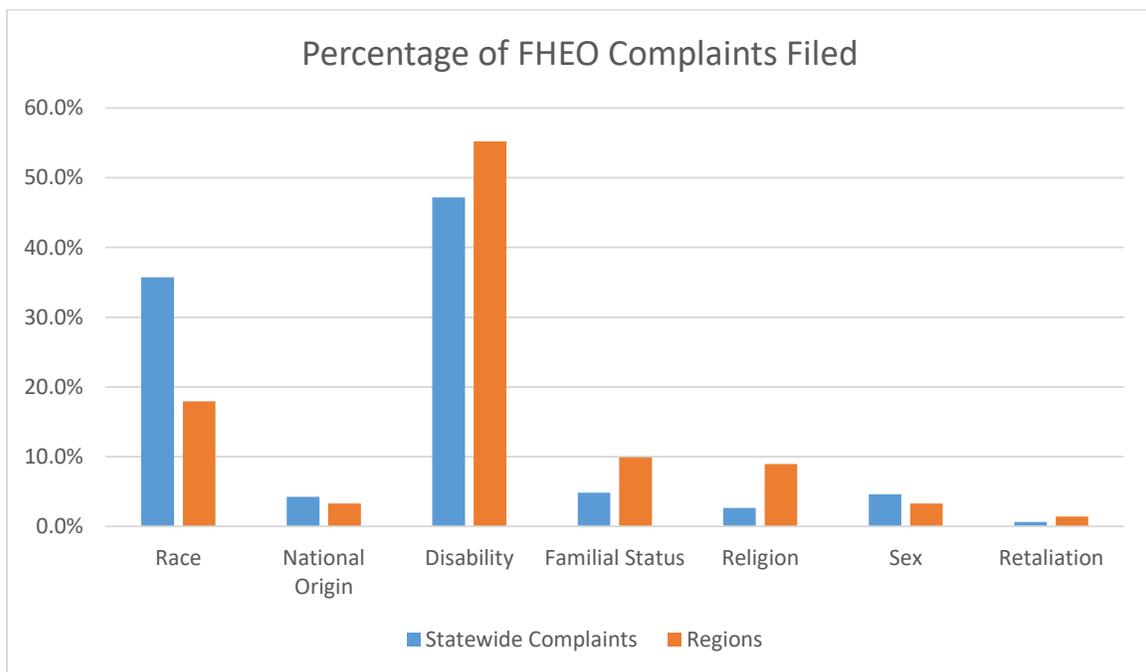
The HUD FHEO Office for the State of Michigan is located in Detroit, Michigan. HUD Region V FHEO Office investigates complaints of housing discrimination based on race, color, religion, national origin, sex, disability, or familial status. HUD will investigate the complaint and try to conciliate the matter with both parties. The HUD FHEO data provided included both open and closed cases for multiple years and for the entire state of Michigan. Data for the Regional analysis were extracted from the original data set provided by FHEO. This section discusses statewide comparisons to Regional complaint data.

As indicated in the table below, during the 2013-2015 timeframe HUD FHEO recorded 1,055 fair housing statewide complaints, 212 of which were in the regions analyzed in this report. The statewide data for Michigan sampled were substantially larger in number, however, when comparing percentages between the statewide data to regional data, it is relatively similar. Among statewide complaints, complaints about disability discrimination were submitted most often (47%), followed by race (36%), then familial status (5%) and sex (5%). Among the non-entitled regions, disability complaints represented an even larger percentage of overall complaints at 55% of all complaints filed during the time period reviewed. The next leading areas of complaints were based on race (18%), familial status (10%) and religion (9%).

In the table and chart below, HUD FHEO fair housing complaints are summarized:

TABLE: Number of Complaints to HUD FHEO by Basis of Discrimination 2013-2015								
	Race	National Origin	Disability	Familial Status	Religion	Sex	Retaliation	Total
Statewide Complaints	377	45	498	51	28	49	7	1,055
Regions Only	38	7	117	21	19	7	3	212

Source: HUD FHEO 2013-2015



MSHDA Complaints

The Michigan State Housing Development Authority (MSHDA) records fair housing complaints received by its departments. While the volume of complaints MSHDA receives is low, the basis for complaints mirrors those submitted to HUD and MDCR.

During the period of 2013 to 2015, MSHDA received 22 complaints from all areas of the state. In sorting and reviewing the data it was found that 4 disability complaints were collected from the non-entitled regions covered by this report. This data correlates with the data that HUD FHEO recorded in the sense that disability discrimination and refusal to make reasonable accommodations is the primary type of fair housing complaint reported, followed by race, then religion and sex.

TABLE: Number of Complaints to MSHDA by Basis of Discrimination 2013-2015								
	Race	National Origin	Disability	Familial Status	Religion	Sex	Unknown	Total
Statewide Complaints	7	-	12	-	1	1	1	22
All Regions	-	-	4	-	-	-	-	4
Source: MSHDA, 2013-2015								

Michigan Department of Civil Rights Complaints

The Michigan Department of Civil Rights (MDCR) was created by the Michigan Constitution of 1963 to carry out the guarantees against discrimination. MDCR investigates complaints to determine whether unlawful discrimination has occurred under federal or state law. MDCR is impartial and does not act as an advocate or representative for either party while investigating a complaint.

MDCR regularly receives and investigates fair housing complaints that range from disability to housing fraud concerns. MDCR investigates alleged housing discrimination against any person because of religion, race, color, national origin, age, sex, marital status, familial status, physical and mental disabilities, and retaliation.

Complaint data received from MDCR focused on complaints filed for race, color, religion, national origin, sex, disability, or familial status. By focusing on only these complaints, comparisons could be made across the various data sets provided.

Between 2013-2015, MDCR received 317 complaints of discrimination. In the table below, MDCR data is compiled to show the total number of housing complaints received from 2013-2015 period in the regions covered by this report. As seen in the HUD and MSHDA complaints, disability is the most frequent basis for complaints followed by race, familial status, and religion.

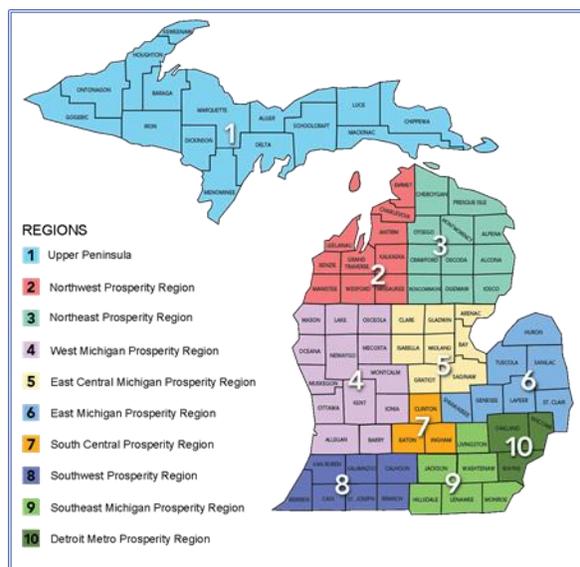
TABLE: Number of Complaints to MDCR by Basis of Discrimination 2013-2015								
	Race	National Origin	Disability	Familial Status	Religion	Sex	Retaliation	Total
All Regions	80	8	164	24	20	11	10	317
	25%	3%	52%	8%	6%	3%	3%	100%
Source: MDCR, 2013-2015								

Complaints by Region

This section examines more closely the complaints received by region.

Based on HUD FHEO data from 2013-2015, disability discrimination was the most common complaint reported within the regions with (117) reported incidents. The next most frequent basis for complaints were race (38), familial status (21), religion (19), sex (7), national origin (7), and retaliation (3).

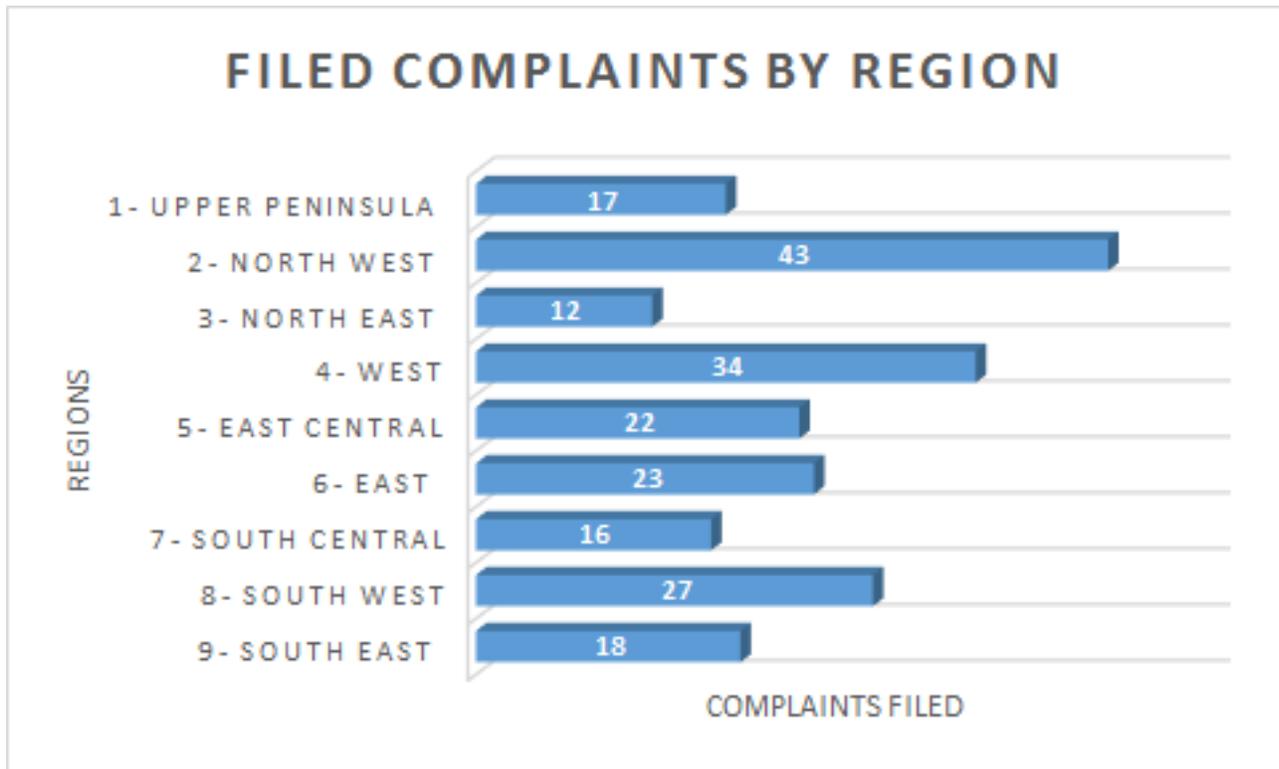
The table below further breaks down the bases of fair housing complaints by region. As shown, overall the most complaints were received from Region 2 where 20 percent of the complaints originated over the period reviewed, followed by Region 4 (16%) and Region 8 (13%). The most disability complaints were received from Regions 4, 5, and 1, in that order. The most race complaints were received from Regions 4 and 8. The most familial status and religion complaints were received from Region 2, with 18 of the 19 total religion complaints originating from this region.



Region	Basis of Complaint							
	Total	Race	National Origin	Disability	Familial Status	Religion	Sex	Retaliation
1- Upper Peninsula	17	1	-	14	1	-	-	1
2- North West	43	4	-	11	7	18	3	-
3- North East	12	2	-	7	3	-	-	-
4- West	34	11	-	19	4	-	-	-
5- East Central	22	3	1	17	1	-	-	-
6- East	23	4	-	11	2	1	3	2
7- South Central	16	2	1	12	1	-	-	-
8- South West	27	9	2	13	2	-	1	-
9- South East	18	2	3	13	-	-	-	-
TOTAL	212	38	7	117	21	19	7	3

*Source: HUD FHEO 2013-2015, * Detroit Region data is excluded from this Analysis of Impediment report.*

The chart below illustrates the nine regions of Michigan by total number of Fair Housing complaints filed:



Source: HUD FHEO 2013-2015, * Detroit Region data are excluded from this Analysis of Impediments report.

The following provides an overview of each region and the fair housing complaints received as assessed from the data provided by HUD’s FHEO Office:

Region 1- Upper Peninsula - There were 17 complaints filed in the Upper Peninsula Region. The majority of complaints were filed on the basis of disability discrimination (82%), followed by race (6%), familial status (6%) and retaliation (6%).

Region 2- North West - There were 43 complaints filed in the North West Region. The majority of complaints were filed on the basis of religion (42%), followed by disability discrimination (26%), familial status (16%), race (9%) and sex (7%). This region experienced 99% of the total number of religion complaints.

Region 3- North East - There were 12 complaints filed in the North East Region. The majority of complaints were filed on the basis of disability discrimination (58%), followed by familial status (25%) and race (17%).

Region 4- West - There were 34 complaints filed in the West Region. The majority of complaints were filed on the basis of disability discrimination (56%), followed by race (32%) and familial status (12%).

Region 5- East Central - There were 22 complaints filed in the East Central Region. The majority of complaints were filed on the basis of disability discrimination (77%), followed by race (13%), familial status (5%) and national origin (5%).

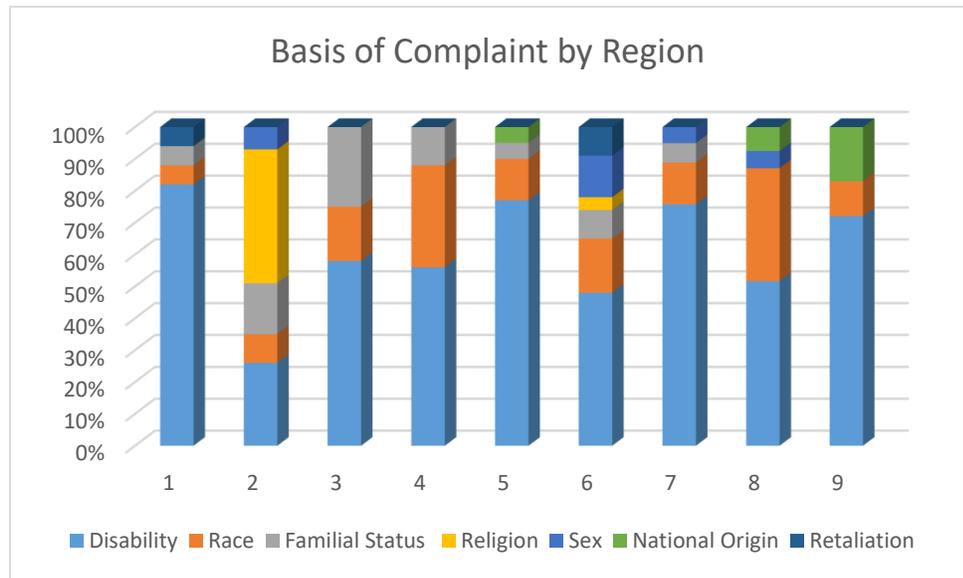
Region 6- East - There were 23 complaints filed in the East Region of Michigan. The majority of complaints were filed on the basis of disability discrimination (48%), followed by race (17%), sex (13%), retaliation (9%), familial status (9%) and religion (4%).

Region 7- South Central - There were 16 complaints filed in the South Central Region of Michigan. The majority of complaints were filed on the basis of disability discrimination (75%), followed by race (13%), familial status (6%) and national origin (6%).

Region 8- South West - There were 27 complaints filed in the South West Region of Michigan. The majority of complaints were filed on the basis of disability discrimination (48%), followed by race (33%), national origin (7%), familial status (7%) and sex (5%).

Region 9- South East - There were 18 complaints filed in the South East Region of Michigan. The majority of complaints were filed on the basis of disability discrimination (72%), followed by national origin (17%) and race (11%).

This information is illustrated in the following chart:



Region
1- Upper Peninsula
2- North West
3- North East
4- West
5- East Central
6- East
7- South Central
8- South West
9- South East

Complaint Resolutions/Closures

This section will examine the housing complaint closures and resolutions as reported by HUD FHEO and MDCR. Both data sets have been analyzed and categorized into four main categories, listed below:

1. **No cause or insufficient evidence** – After review by FHEO or MDCR it was determined that the claim lacked sufficient evidence or it was determined that there was no cause for the housing complaint.
2. **Withdrawn** – The fair housing complaint was withdrawn by complainant with or without resolution. This category also captures complaints where the complainant was unresponsive and ultimately the complaint was withdrawn due to lack of response.
3. **Settlement** – The complaint filed was reported settled by the data provided, which may or may not have included a monetary settlement agreement.
4. **Open** – These complaints were not closed at the time data was provided for this report.

The table below summarizes both FHEO and MDCR complaint data:

TABLE: Complaint Disposition					
	No Cause	Withdrawn	Settlement	Open	Total
FHEO	131	29	40	12	212
MDCR	203	45	51	18	317
<i>Source: HUD FHEO 2013-2015, MDCR 2013-2015</i>					

The Michigan Department of Civil Rights (MDCR) data previously described explained the number of housing complaints filed within MSHDA’s service area; of the 317 housing complaints received from 2013 – 2015, sixty-four percent (64%) of the total number of complaints were determined to have no cause or lacked sufficient evidence. Fourteen percent (14%) of the total complaints were withdrawn by MDCR with or without resolution or the complainant was not interested in pursuing the housing complaint. Only sixteen percent (16%) of all 317 housing complaint reached settlement agreements. The data revealed that in those cases where a monetary settlement agreement was reached, the monetary awards ranged from \$250 - \$4,750. Lastly, six percent (6%) of the total number of complaints remained open at the time MDCR provided the data sets for this report.

Similar to the MDCR’s data, HUD’s Fair Housing and Equal Opportunity Office (FHEO) had sixty-two percent (62%) of the total numbers of housing complaints received were determined to have no cause or lacked sufficient evidence. Fourteen percent (14%) of the total complaints were withdrawn by FHEO with or without resolution or the complainant was not interested in pursuing the housing complaint. Nineteen percent (19%) of the 212 housing complaint reached settlement agreements. From FHEO’s data, those cases in which a monetary settlement agreement was reached, the monetary awards ranged from \$250 - \$2,630 dollars. Lastly, five percent (5%) of the total number of complaints remained open at the time HUD’s FHEO Office provided the data for this report.

VIII. Public Involvement

Focus Groups

Methodology

MSHDA hosted a series of focus groups and meetings to collect stakeholder input on impediments to fair housing throughout the state and recommendations to address these impediments. Information about the focus groups is located in the table below.

Location	Date	Description	No. of Participants
Grand Rapids	February 23, 2016	Focus group, MSHDA mailing list invited	18
Shepherd	February 24, 2016	MSHDA regional meeting, jurisdictions present. Note, event included video-linked participation from other locations, including UP sites.	+/-100
Lansing	February 24, 2016	Focus group for Fair Housing Center representatives. Due to inclement weather focus group was held remotely.	7
Jackson	February 25, 2016	Focus group, MSHDA mailing list invited. Due to inclement weather focus group was held remotely.	4
Lansing	February 26, 2016	Focus group, MSHDA mailing list invited	11
Marquette	April 14, 2016	Public Meeting to discuss Consolidated Plan & AI	2
Gaylord	April 14, 2016	Public Meeting to discuss Consolidated Plan & AI	12

MSHDA and TDA drafted a series of questions to act as conversation prompts. The questions covered impediments to fair housing and fair housing choice, unfair or questionable practices in housing markets, access to social and public services, fair housing intervention practices, and recommendations to address fair housing issues. A complete record of each focus group, along with an attendance list, can be found in Appendix B. A short summary of each of the three public focus groups is provided below.

Results

Grand Rapids Focus Group:

- This group did not see tangible outcomes from the previous Analysis of Impediments.
- Most discrimination is observed on the basis of: disability, familial and marital status, race, national origin.
- Tight rental market in Western Michigan exacerbates usual issues involving protected classes and other vulnerable populations.
- Increasing active real estate market has also given rise to questionable practices in homebuyer market.
- Resources for fair housing education have diminished. Official education efforts are token and/or outdated.
- Confusion among public and service providers about where to report violations. Lack of transparency and effectiveness of enforcement.
- Variety of legal issues: some classes (e.g. LGBT, source of income) unprotected by law; local rule system invalidates efforts by counties; lack of awareness in planning and zoning commissions.
- In general, those with disability and other special needs likely face the hardest battle to find housing. This issue is undeniably linked to issues in the general rental market.
- Criminal background checks are sometimes used as a way to practice discrimination based on other factors without overtly discriminating against a protected class.

Jackson Focus Group:

- Group described the need for inclusionary zoning, and other legal solutions, such as restrictive definitions of family.
- Also a need for education among various stakeholders: homebuilders, landlords/managers.
- Many issues identified related to housing for those with disabilities and seniors.
- Worries about lack of affordable housing generally and impending end of affordability periods.

Lansing Focus Group:

- Group noted that it was unclear whether recommendations from previous AI were instituted.
- One of most glaring impediments is private land contracts that are not transparent and lead to abuses by slumlords. Tight rental markets contribute to landlord's ability to commit abuses. Disenfranchised individuals are most at risk of being victims of these practices as their housing options are limited because of credit, income, and background check issues. Often there is a disparate impact based on race and national origin as these issues tend to be concentrated among minority populations.
- Other noted impediments to fair housing include unaddressed lead paint issues, unrealistic Fair Market Rents (FMRs), and advertising violations by sellers in real estate market.
- Need easier reporting of violations and more fair housing center resources, especially in Northern Michigan. Specific issues reported with reporting to Michigan Department of Civil Rights. It's unclear what enforcement actions are taken and whether enforcement leads to outcomes that

have a lasting impact. The general sense was that sometimes cases are closed with limited consequence to the offenders.

- All parties in rental and real estate market need education: renters, buyers, landlords, and realtors.
- A variety of zoning and local ordinance issues perpetuate discrimination.
- Senior housing is a very important issue in this part of the State. Not enough affordable housing for seniors.
- Non-English Language services too focused on Spanish and Arabic; need assistance for a variety of other languages.
- Variety of broader societal issues affecting fair housing: lack of public transit, changing education landscape (including schools of choice).
- Areas not receiving attention: Northern part of state lacking resources of south; state of housing is still deeply segregated, which needs to be addressed.
- Individuals exiting prison are often discriminated against through strict rental policies that prohibit renters with criminal records. Often this results in a disparate impact based on race and national origin as there are higher rates of incarceration among minority populations.

Surveys

MSHDA conducted three online surveys to gather input about fair housing in Michigan from the public and interest groups. The target groups for the surveys were local government jurisdictions receiving funds from MSHDA, non-profit and stakeholder groups with an interest in fair housing, and residents of the State.

Methodology

MSHDA drafted survey questionnaires with assistance from TDA to collect a range of perspectives on specific categories of issues. The survey questionnaires are included as Appendix C. The first survey question asked respondents which of the three target groups they belong to, and then directed them to the proper questionnaire based on their response. The jurisdiction and stakeholder surveys asked the same questions, but the wording was changed in some areas to reflect differences in the two groups. The survey for residents of the state was also available in a Spanish-language version. Jurisdiction and stakeholder respondents were asked to complete the survey from an organizational, and not personal, viewpoint, but were invited to complete the resident survey separately. Respondents were also required to provide their county of residence or occupation to allow analysis at the regional level.

While questions about target group and county were required, most other items were not required to submit the survey. As a result, survey questions were answered by a varied number of respondents. While not preferable, not requiring a response to all items allows the respondent to skip over sections of the survey that may not be applicable and still respond to subsequent questions. The alternative option of

requiring all questions was considered an invitation for respondents to quit the survey before their responses were recorded.

The surveys were administered electronically using Survey Monkey as a host platform from March 24, 2016 to May 9, 2016. MSHDA distributed the survey link to its jurisdictions and stakeholders and requested that they pass it on to colleagues, partners, and the general public. MSHDA also promoted the survey at the annual statewide Building Michigan Communities Conference to solicit further responses. A link to the survey was also posted on MSHDA's website.

Results and Analysis

A total of 478 individuals accessed the survey and at least answered the required questions about target group and county. The number of respondents by target group is shown in the table below.

Table: Responses by Survey	
Survey	No. Participants
Resident	225
Jurisdiction	76
Stakeholder	177
Total	478

Below is a detailed summary of the survey results. The survey results for each target group are presented, followed by a discussion of where individual regions differ from the state as a whole. As mentioned above, the number of respondents for each survey item varied greatly. The population considered for each question is the number of respondents who replied to the item (i.e. percentages refer to the percentage that replied to the question, not the percentage of all who access the survey for that target group).

Statewide Resident Survey

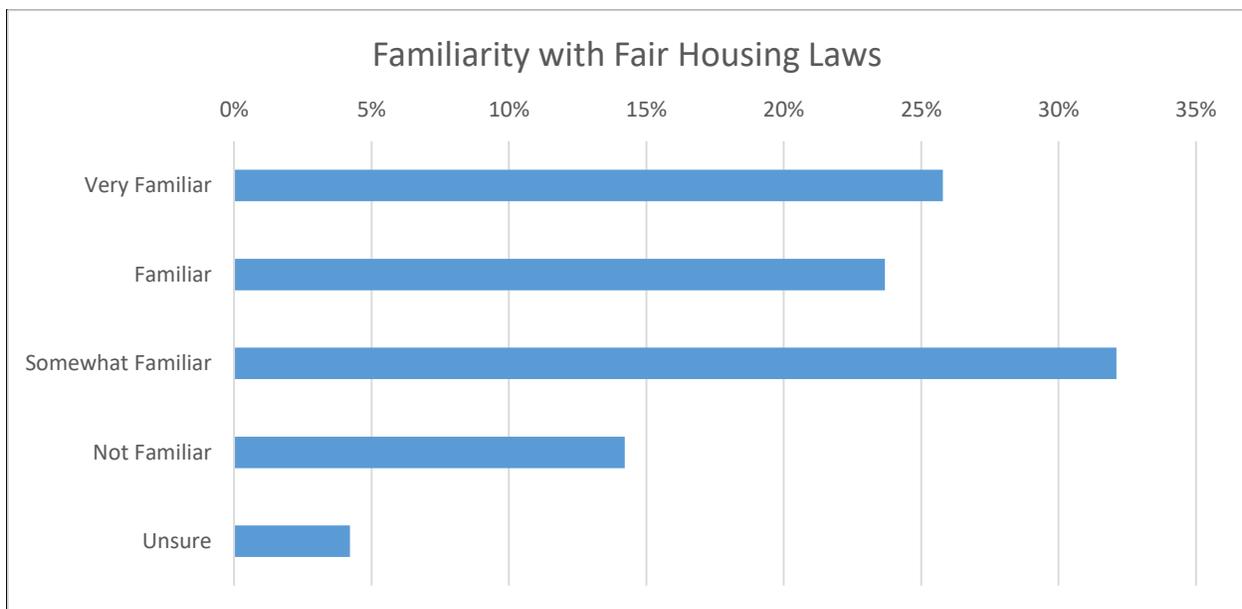
A total of 225 individuals provided responses for the resident survey. In many demographic categories, the survey respondents mirrored the residents of Michigan as a whole according to U.S. Census Bureau data. Three quarters of respondents were white, just under a quarter black or African American (23%) and the remainder (2%) chose "other" for their race; five percent of all respondents were of Hispanic/Latino origin. A large majority of respondents, about 70 percent, were homeowners. Finally, about one-tenth of respondents reported having a disability. All of these values are within several percentage points of U.S. Census Bureau data for 2010-2015.²¹

However, in several other demographic categories the survey respondents were quite different from the state as a whole. Three-quarters of respondents were females, compared to 51 percent of state residents.

²¹ Source: Census Bureau Quick Facts, <https://www.census.gov/quickfacts/table/PST045215/26>

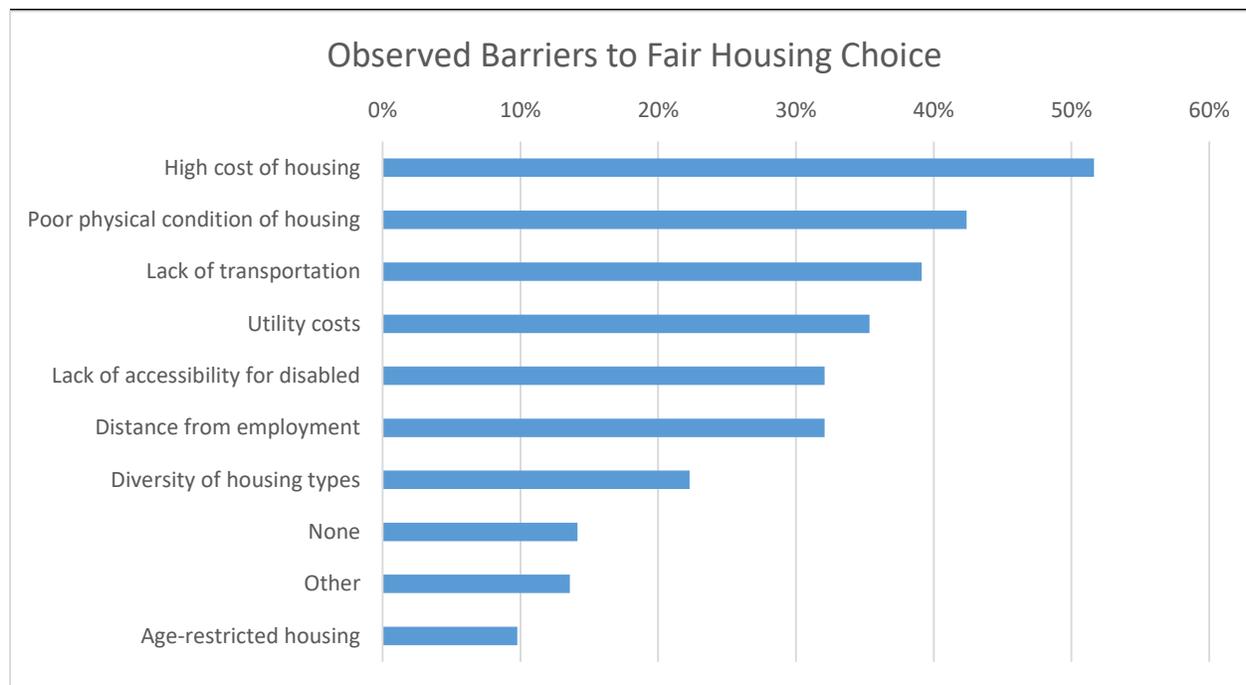
Middle-aged (45-64 years old) respondents made up a disproportionately large segment of the participants at 53 percent. Only one survey participant claimed a language besides English as the primary language in their household; nine percent of state residents speak another language at home. Around half of respondents reported household income in the highest category offered, \$62,000 or more per year, but the State median household income is \$49,087. The results of the resident survey should clearly be read with an understanding that the survey respondents were, in many factors, different than the State’s population.

The survey asked participants to provide insights about the conditions in their neighborhoods. Most respondents had an above-average perception of their neighborhood. The most selected responses when asked to rate their neighborhood on a 10-point scale were 8 (23%), 7 (21%), and 9 (14%). In fact, the bottom five numbers on the scale were selected by just 22% of respondents. However, a considerable number of residents indicated dissatisfaction with specific issues in their neighborhood. Nearly half (47%) indicated a lack of proper maintenance of neighboring homes, while 42 percent reported vacant buildings in their neighborhood and 39 percent dissatisfactory local services (such as trash pick-up).



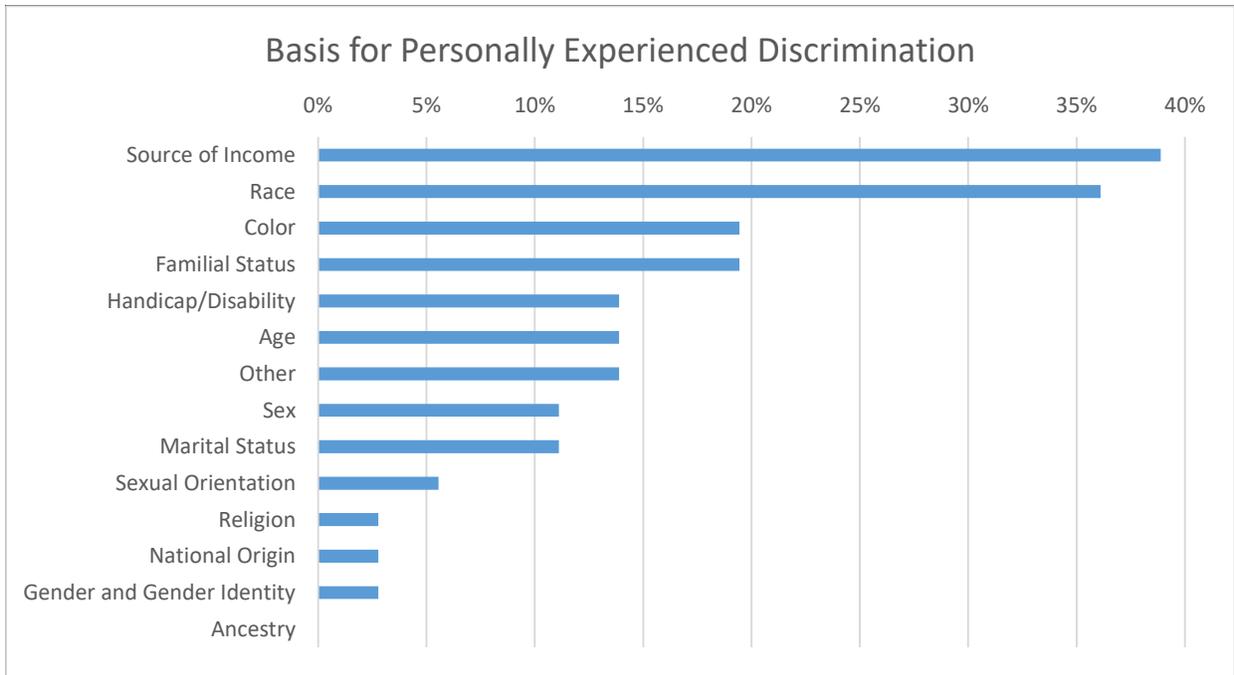
The chart above shows participant familiarity with housing laws, and few reported little or no familiarity with the subject. A slight majority (53%) reported knowledge of their rights under the federal Fair Housing Act and related Michigan laws. Nearly half of respondents also claimed awareness of fair housing events and trainings in their community. Those responding to this survey were clearly well versed in the subject matter, and many might even work in related fields; many participants mentioned their jobs when replying to an open-ended question about attending fair housing events. (As with some of the demographic factors, it is important to remember here that this audience may not reflect that of the state generally.)

One survey item listed barriers to housing choice and asked respondents to select those they have observed or experienced in their community. The chart shows the results of this question. High cost of housing was the barrier selected by the most respondents (52%), followed by poor physical condition of housing (42%), and lack of access to public transportation (39%).



Over a quarter (28%) of participants reported observing outright housing discrimination in their community. The commonly cited factors leading to this discrimination were source of income (23% who observed discrimination described this as “very severe”), handicap/disability (22% “very severe”) and race (21% “very severe”).

While some might observe discrimination in their community, others experience it personally as victims, as 18 percent of respondents disclosed on the survey. (Also of note, 7% said they were “not sure” if they had experienced housing discrimination.) The chart below shows the reasons why these victims believe they were discriminated against. Among the leading reasons were source of income (39%), race (36%), and familial status (19%). The survey asked for other information about these incidents of housing discrimination. Two-thirds of the experiences occurred in the rental market, with more occurring in single-family neighborhoods than larger complexes. This suggests that smaller landlords may be more commonly the perpetrators of housing discrimination, whether consciously or not. Finally, a large majority (70%) of victims did not report these acts of discrimination, and the leading reason why was the perception that reporting would not make a difference (69%).



The resident survey respondents believe they have knowledge about fair housing laws, but do not believe these laws are enforced in Michigan. It is also noteworthy that many of the highly cited bases for housing discrimination mirror those mentioned in MSHDA’s focus groups—source of income, disability, race, and familial status.²² Further, the barriers to housing choice mentioned in the survey echo the impediments identified in the groups and interviews, namely, a lack of decent, affordable housing that provides access to transportation, employment, and functioning public services.

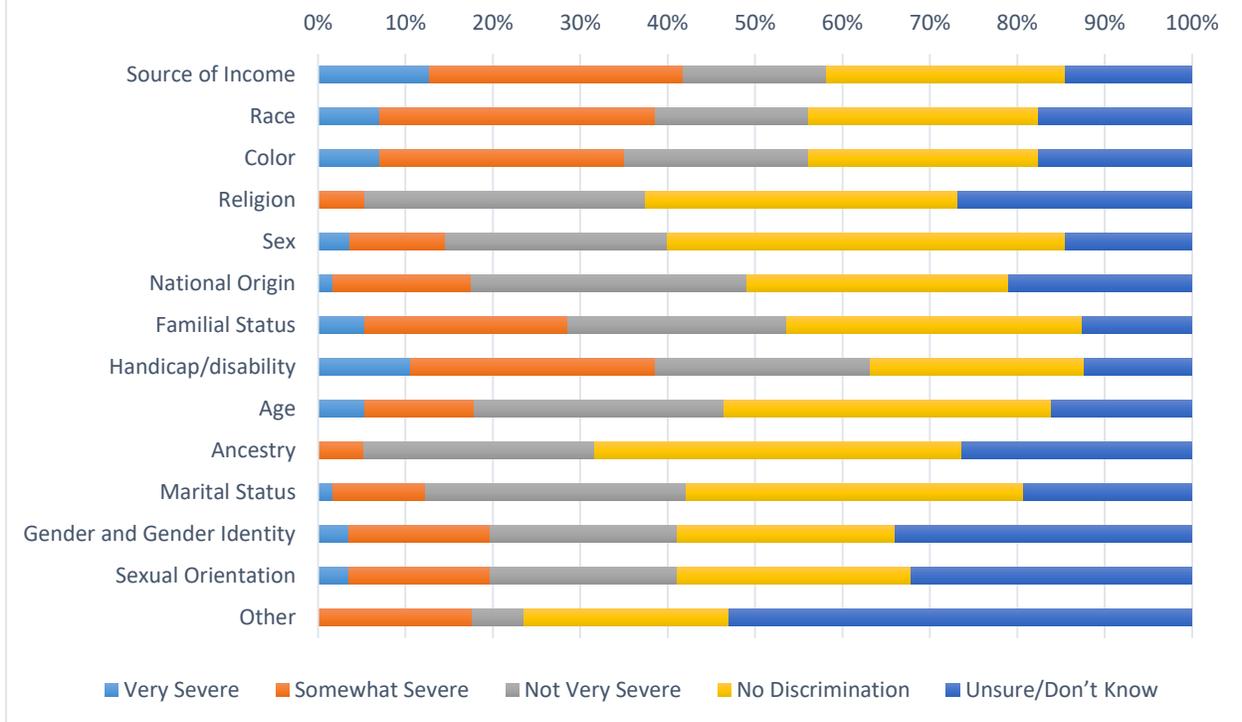
Statewide Jurisdiction Survey

A total of 76 individuals provided responses for the jurisdiction survey. A majority (78%) reported working in local government (12% reported working in the non-profit sector, and likely should have taken the stakeholder survey; 10% selected a variety of other options). Eighty-two percent described themselves as “very familiar” or “familiar” with fair housing laws.

The jurisdiction survey asked participants to give their opinion about the severity of housing discrimination in a number of areas. The chart below shows the results of this question. The respondents clearly do not see discrimination in these areas as extreme; in only two areas did more than 10% of respondents find discrimination “very severe”—source of income and disability. In every category, more respondents indicated no discrimination or rated it “not very severe” than rated it “very” or “somewhat severe.”

²² The categories included for selection in the chart above are based on protections offered under federal and state fair housing laws.

Reported Severity of Housing Discrimination in Jurisdiction Service Area



While these participants may not see outright housing discrimination as widespread, they did indicate that some societal impediments to fair housing are more acute. Over three-quarters (76%) of respondents rated lack of access to public transportation as a “very” or “somewhat severe” impediment. Large majorities also found economic impediments to be prevalent, including lack of capable affordable housing developers (84% “very” or “somewhat severe”), inability to secure enough subsidies to develop affordable housing (70% “very” or “somewhat severe”), and high costs of construction (62% “very” or “somewhat severe”). The survey also asked about impediments related to government policies or actions, but in no cases did majorities of respondents rate these items as severe. As the target group for the survey is government workers, this could come from reluctance to be self-critical.

Fifteen respondents indicated that residents in their jurisdiction submitted complaints about fair housing discrimination. Race was a contributing cause of the discrimination cases for ten respondents, and disability in nine (respondents were able to select more than one basis of discrimination).

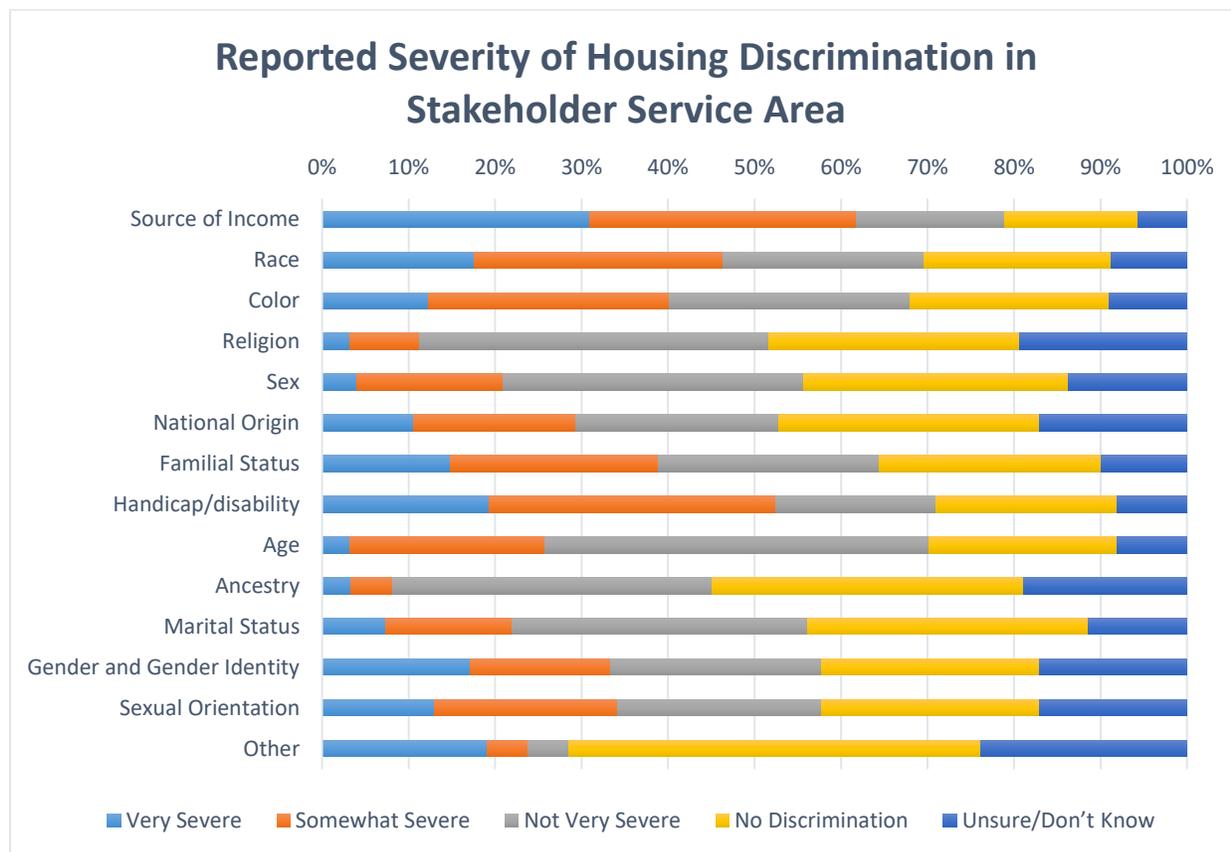
The survey also asked whether participants were aware of questionable practices in a variety of housing markets and policy areas—rental, real estate, mortgage and lending, minority access to local boards and commissions, land use policies, zoning laws, and any other are of concern to housing. A majority or plurality of respondents indicated that they did not know of questionable practices in every one of these

markets or policy areas. The area with the most “yes” responses was rental housing market for which 25 percent of participants cited questionable practices.

These survey results suggest that jurisdictions see societal impediments to fair housing as more widespread than outright discrimination. (Although it is noteworthy that nearly 20% of respondents have had residents report housing discrimination.) In particular, they point to weaknesses in the affordable housing development market such as lack of capable developers and available development subsidies. The respondent did not, however, suggest that government policies and actions were impediments to fair housing; the stakeholder survey discussed below provides a different perspective on this and many other points.

Statewide Stakeholder Survey

A total of 177 individuals provided responses for the stakeholder survey. The majority (69%) worked for nonprofit organizations, another 10% worked in banking or finance, and the remainder represented a wide variety of groups. These respondents were highly aware of fair housing laws and regulations. A majority (63%) described themselves as “very familiar” with fair housing laws, and the remainder responded “familiar” or “somewhat familiar;” no respondents indicated complete unfamiliarity with fair housing laws.



The chart above shows the how respondents rated the severity of housing discrimination in a variety of areas. A majority found source of income (62%) and disability (52%) to be “very” or “somewhat severe,” and nearly half (47%) cited race as well. In general, this audience reported more acute housing discrimination than jurisdictional respondents.

Stakeholders also cited societal impediments to fair housing as more severe than their jurisdictional counterparts. In the area of services and opportunities, a majority rated access to public transportation (80%), inadequate access to employment (74%), and inadequate marketing of available housing (69%) as “very” or “somewhat severe” impediments. A majority of respondents reported all listed economic impediments to fair housing as “very” or “somewhat severe,”²³ with the exception of two impediments solely concerned with the real estate market (unfair lending practices and unethical real estate processes). However, 67 percent of respondents rated another impediment related to the homebuyer market, shortage of available mortgage funding, as severe. These results suggest that the impediments in the homebuyer market may be more about lack of resources than outright discriminatory practices.

When compared to jurisdictions, the stakeholder audience was generally more critical of governmental barriers to fair housing, as well as government efforts to combat housing discrimination. A majority of stakeholder respondents found both lack of comprehensive fair housing planning (56%) and inadequate representation of diverse interests on local boards (55%) to be “very” or “somewhat severe.” When asked to rate the effectiveness of government actions to promote fair housing in service area, a majority or plurality selected “somewhat effective” for nearly all the actions listed.²⁴ However, in two areas a plurality of respondents thought that the government actions were “not at all effective”: developing housing for large households (41%) and increasing housing choices for Housing Choice Voucher participants (43%). Stakeholders were also asked to evaluate the effectiveness of fair housing educational outreach practices used by jurisdictions in service area. In all cases, majority or plurality responded, “don’t know.” This suggests that jurisdictional efforts at fair housing education are not prominent enough for stakeholders involved in the field to even make an assessment.

Nearly thirty percent (52 of 177) of stakeholders told of clients who reported being victims of housing discrimination. The leading contributing causes of discrimination cited were race (60%), disability (54%), and familial status (42%). In addition, a substantial number of responses not included on the list recurred in the open-ended field for the “other” selection: ten comments included income or source of income and six included criminal history.

²³ In order of rated severity: inability to secure subsidies to develop affordable housing, capable affordable housing developers, high construction costs, activities causing housing displacement, shortage of available mortgage funding.

²⁴ This list included: Coordination between local and regional housing agencies, coordination between enforcement agencies, partnering with nonprofits that assist affected groups, developing process for requesting reasonable accommodation in housing those with disabilities, allocating funds for affordable housing, citing affordable housing near transit options, citing affordable housing near public and social services, and citing affordable housing near employment.

Finally, the survey asked respondents to indicate any awareness of questionable practices in various housing markets and policy areas. Half of respondents indicated awareness of such practices in the rental housing market, double the proportion of jurisdictional respondents. However, no more than 30% of respondents indicated an awareness of questionable practices in any other area.

The survey results demonstrate that stakeholder groups see more severe outright housing discrimination and societal impediments to fair housing than the governmental jurisdictions that receive funding from MSHDA. Of particular note, stakeholder groups have a much more critical view of governments' involvement in fair housing. The bases for discrimination were in many cases the same as those found in the resident survey and focus groups: source of income, race, disability, and familial status.

Regional Analysis

A regional analysis is presented here in an effort to identify areas of the state where fair housing conditions and needs may differ from the state as a whole. The analysis does not present complete results for each region; rather, it highlights areas where the region's responses strongly deviate from the statewide results.

The analysis omits responses from residents of the "excluded counties," including the entirety of MSHDA Region 10.²⁵ The next table shows the responses to the three surveys from each MSHDA region. It is difficult to generalize results when there are only several responses and so responses for each instrument in a given region were analyzed once the number of participants totaled 12 or more. The regional results that were skipped are highlighted in yellow in the table. (Note also that while the table may show a number of respondents to a survey, the actual responses to each survey item are often much lower due to skips).

Region	Resident	Jurisdiction	Stakeholder	Total
1	18	7	20	45
2	20	13	20	53
3	3	5	3	11
4	15	12	17	44
5	9	2	11	22
6	3	4	2	9
7	38	7	9	54
8	14	13	12	39
9	6	5	11	22
Excluded Counties	99	8	72	179
Total	225	76	177	478

²⁵ Note that because the survey did not ask respondents for their city/town, we were not able to omit responses from excluded entitlement communities that lie within included counties.

Region 1: Upper Peninsula

- Resident Survey:
 - Three-quarters of Region 1 residents reported dissatisfaction with services in their neighborhood, up from 39% of respondents statewide.
 - In several cases Region 1 residents had a higher observation of barriers to housing choice, including 30% higher observation of poor physical conditions of units, 20% higher of access to transportation, and over 40% higher observation of high utility costs.
 - Only 20% of Region 1 respondents were aware of opportunities for fair housing training, compared to 44% statewide.
 - The demographics for this group were nearly identical to the state except every respondent was white and incomes were slightly lower.
- Jurisdiction Survey: insufficient responses
- Stakeholder Survey:
 - Region 1 stakeholders rated housing discrimination as non-existent or less severe than statewide stakeholder in discrimination based on religion, sex, familial status, and national origin.
 - Five respondents have had clients report housing discrimination. The perceived reasons for discrimination were familial status in three cases, disability and age in two cases, and sex in one.
 - Only two of eleven respondents were aware of questionable practices in the rental housing market, as opposed to half of stakeholders statewide.

Region 2: Northwest Prosperity Region

- Resident Survey:
 - Two-thirds of Region 2 residents reported trouble paying their rent or mortgage, compared to one-third statewide. However, only 22% of Region 2 residents reported having trouble making needed repairs to their home, while over half had this issue statewide.
 - Many barriers to fair housing choice were observed by a higher proportion of respondents in Region 2. For example, the most observed barrier statewide was high cost of housing at 52% of respondents. High cost of housing was also the most observed barrier in Region 2 alone, but at 78%. Other barriers with much higher reported incidence were poor physical condition of available housing units (19% higher in Region 2) and distance of available housing to employment opportunities (35% higher).
 - Only one respondent out of 20 reported personal experience with housing discrimination.
- Jurisdiction Survey:
 - Some of the economic impediments to fair housing were reported by a higher number of respondents from Region 2. For example, while just over half of respondents statewide

found high construction costs to be a very severe or somewhat severe impediment, 100% of respondents from Region 2 found this to be a very or somewhat severe impediment. Another example is high cost of land with 40% higher severity reported amongst Region 2 respondents.

- Only one respondent reported having clients who have complained about fair housing violations.

Stakeholder:

- Stakeholder Survey:
 - Five respondents have had clients complain about fair housing violations, with three of these violations occurring at least in part because of familial status.

Region 3: Northeast Prosperity Region – insufficient responses to all surveys

Region 4: West Michigan Prosperity Region

- Resident Survey:
 - In Region 4, 69% of respondents have observed discrimination based on disability in their community, compared to 32% statewide.
 - Two of fifteen respondents reported personal experience with housing discrimination.
 - Demographically, the Region 4 respondents were more evenly represented by gender, but only two were not middle aged.
- Jurisdiction Survey:
 - For economic impediments to fair housing, 5 of 8 respondents (63%) rated “activities” causing housing displacement as a “somewhat severe” impediment. Only about 30% of respondents statewide found this to be a “very” or “somewhat severe” impediment.
 - Four respondents indicated they have had clients who have experienced about housing discrimination. Handicap/disability, race, and color were each one of the causes in three of the incidents, which is similar to the causes of observed discrimination by jurisdictions statewide.
- Stakeholder Survey:
 - Three-quarters of Region 4 stakeholders found lack of diverse representation on local boards, zoning/land use ordinances, and building codes to be “very” or “somewhat severe” governmental impediments to fair housing. This is compared to around or less than half for each of these values statewide, suggesting Region 4 may have more issues with these government policies affecting fair housing.
 - Six respondents had clients report complaints of housing discrimination, and race was at least part of the reason for the discrimination in every one of these cases. Color, disability, and national origin played a part in half of the cases.

Region 5: East Central Prosperity Region – insufficient responses to all surveys

Region 6: East Prosperity Region – insufficient responses to all surveys

Region 7: South Central Prosperity Region

- Resident Survey:
 - Three-quarters of respondents from Region 7 indicated a dissatisfaction with local services such as trash pick-up and street maintenance, a much larger proportion than the 40% who had the same opinion state-wide.
 - A smaller proportion of respondents from Region 7 reported observing housing discrimination in several categories, including high cost of housing (32% in Region 7 compared to 52% statewide), poor physical condition of available housing (23% in Region 7 compared to 42% statewide), and lack of accessible housing for those with disabilities (13% in Region 7 compared to 32% statewide).
 - Only two respondents indicated they had observed housing discrimination in their community, and only two respondents had personally experienced housing discrimination.
 - Demographics were almost identical to the statewide results, with the exception that almost all respondents from Region 7 were in the highest income category.
- Jurisdiction Survey: insufficient responses
- Stakeholder Survey: insufficient responses

Region 8: Southwest Prosperity Region

- Resident Survey:
 - A much higher proportion of Region 8 residents (86% of respondents) reported lack of repair or maintenance in neighboring homes than statewide (47%). This suggests there could be code enforcement issues in this region.
 - There also may be less familiarity with fair housing laws in this region. Only 14% of respondents statewide reported no knowledge with fair housing laws; in Region 8, 40% of respondents indicated no familiarity with fair housing laws.
 - Poor physical condition of housing may also be more of an issue in Region 8. Just over three-quarters of respondents from the region reported this as an observed barrier to fair housing choice, almost double the statewide response.
 - Five of ten respondents reported personal experience with housing discrimination. The leading contributing causes were source of income in three instances of discrimination, and race and familial status in two instances each.

- Jurisdiction Survey:
 - Three respondents have had clients report incidents of housing discrimination. Familial status was a cause of discrimination for all three, and race was listed as a cause for two.
- Stakeholder Survey:
 - Three respondents have had clients report incidents of housing discrimination. Familial status and handicap were each cited as a contributing cause twice.

Region 9: Southeast Michigan Prosperity Region

- Resident Survey: insufficient responses
- Jurisdiction Survey: insufficient responses
- Stakeholder Survey:
 - Four respondents have had clients report incidents of housing discrimination. Race was reported as a contributing factor for all four respondents.

Stakeholder Interviews

MSHDA engaged stakeholders through targeted interviews to explore topics that were not fully covered through other outreach or to clarify information gathered through other efforts. A list of individuals interviewed is included as Appendix D.

IX. Findings and Recommendations

Findings

This AI broadly analyzes actions and conditions that may have the effect of restricting housing choice for people protected under State and federal fair housing laws. The AI not only identifies impediments to fair housing choice, but also makes recommendations to overcome the effects of those impediments and will serve as the basis for fair housing planning, providing essential information to staff, policy makers, housing providers, lenders, and fair housing advocates, and assisting with garnering community support for fair housing efforts.

The study's principal findings are as follows:

- Michigan experienced a .5 percent decrease in population since 2000. The national growth rate for the same period was 11.6 percent. Understanding the direction of population shifts is important because it helps to set a context for the state's demographics and how those changes may impact the housing markets and overall economy of the state. As stated elsewhere, the focus of the report is on fair housing *and* fair housing choice which looks more broadly at people's ability to choose where they live and to have better access to opportunities. The changes in Michigan overall do not result in a significant impact to fair housing choice, but the closer look at the regions shows some differences. MSHDA's Northeast region experienced the greatest decline among the regions with a decline of 4.5 percent while the South Central region experienced the highest regional growth with an increase of 7.8 percent. Understanding the available supply of housing, particularly for those already experiencing housing challenges, is important as populations shift.
- The state's old-age dependency ratio (23.4%) and senior population percentage (14.5%) is about the same as the national figures of 21.9 percent for old-age dependency and 13.8 percent for senior population. The Northeastern region has the highest percentages of seniors at nearly 24 percent while both the Upper Peninsula and Northwest regions senior rates of about 19 percent. Alcona County has the highest county percentage at about 33 percent.
- Michigan's poverty rate (16.9%) is just slightly higher than the national rate (15.6%). However, poverty in Michigan has increased significantly since 2000. The poverty rate in Michigan was 10.5 percent in 2000. As noted, the recent studies show the poverty rate in Michigan at nearly 17 percent, which is a 61% increase since 2000. During that same time period the national poverty rate increased only 26 percent. Whites (the largest racial group in Michigan by far) had a poverty rate lower than the statewide rate at 13.3 percent. All other races and ethnicities experienced poverty rates higher than the statewide rate with African Americans experiencing poverty at a significantly higher rate of 34.7 percent. Regionally, the Northeast and East Central regions have the highest poverty rate at about 17 percent. Isabella County in the East Central region had the highest county poverty rate at 31.8 percent. The Southeast region has the lowest overall poverty rate at 12.1 percent, but this rate has increased 99 percent since 2000 for the highest increase in poverty among the regions.

- The state's veterans experience disabilities at almost double the rate of non-veterans, with the veteran disability rate at approximately 29 percent and the non-veteran rate at 16 percent.
- Due to the housing market crises, Michigan experienced vast fluctuations in housing costs across the state between 2000 and 2014. Between 2000 and 2009 median home values increased nearly 28 percent but then fell sharply by nearly 19 percent between 2009 and 2014 for an overall increase across the 14-year period of just 4 percent. Renters have been impacted to an even higher degree. Median rent increased nearly 30 percent between 2000-2009 and 10 percent between 2009 and 2014 for an overall 43 percent increase during the 14-year period. Given that more people are renting rather than owning homes without similar increases in production, the increases in rent prices is likely attributable to the effects of supply and demand.
- In 2000, about 17 percent of all owners were considered cost-burdened including 13 percent that were considered extremely cost burdened. As of the 2013 calculations, nearly one third (31%) of all owners with a mortgage were cost-burdened including 23.5 percent that were considered extremely cost burdened. While the number of cost-burdened owner households in Michigan in 2014 was 31 percent, the distribution of cost burdened households varied throughout the state. The Northwest region had the highest percentage of cost-burdened owners with a mortgage at 15.2 percent. The counties with the highest number of cost-burdened households include Lake County (47%), Roscommon County (44.1%), and Ontonagon County (43.8%).
- In 2000, 35 percent of all renters were considered cost-burdened including about 28 percent that were considered extremely cost burdened. As of the 2014 calculations, over half (54%) of all renters were cost-burdened including about 45 percent that were considered extremely cost-burdened. While the number of cost-burdened renter households in Michigan in 2013 was 54 percent, the distribution of cost burdened renter households varied widely throughout the state. The Northeast and East Central regions had the highest percentages of cost-burdened renters with about 55 percent. The counties of Roscommon in the Northeast region (67.1%), Isabella in the East Central region (66.7%), and Schoolcraft in the Upper Peninsula (66.7%) saw the highest number of renter households that were cost burdened. As noted previously, these are also areas that have the highest percentages of people living in poverty. Also noted previously, rents in Michigan have increased 43% in the last 14 years with 10% of that increase occurring between 2009 and 2014.
- While the subprime mortgage market in Michigan has declined significantly since 2007, increases have been identified since 2010. Between 2010 and 2014, subprime loan originations increased from 4,503 to 16,198 (260 percent), raising its share of total originations from 2.6 percent to 10.1 percent. While this is only about half of the 2007 level of 19.3 percent, the sharp rise in a four-year period is something that is worth monitoring.
- A review of the denial reasons provided by conventional lenders for home purchase loans shows that, as of 2014, the top denial reasons for African Americans and Hispanics was credit history while for Whites it was lack of collateral. Additionally, a closer look at home purchase denial rates by race/ethnicity and income group within Michigan show that African Americans are denied at higher rates than Whites among both low income and high income applicants. In fact, high-income African

Americans (having greater than 120 percent of Area Median Income) were more likely to be denied for a single family home purchase, at 27 percent, than low-income Whites (having 80 percent or less of Area Median Income), at 21 percent. Low-income Hispanics were denied at a rate of 28 percent, slightly higher than high-income Blacks. Additionally, high-income Hispanics were denied at a rate similar to low-income Whites, at 20 percent. White applicants demonstrated the lowest disparity in denial rates between their low- and high-income applicants at 6 percent, compared to 8 percent for Blacks and Hispanics.

- Since 2013 the most common fair housing complaints reported to HUD FHEO were (1) disability (47%), (2) race (36%); (3) familial status (5%); and (4) sex (5%). Among the regions, disability complaints represented an even larger percentage of overall complaints at 55 percent of all complaints filed during the time period reviewed. The other areas of complaints were based on race (18%); familial status (10%), and religion (9%). Nearly 100% of all regional complaints based on religion were filed in the Northwest region.
- About 14 percent of Michigan's residents live with a disability. In nominal terms, this is 1.6 percent higher than the national rate of 12.3 percent, but put another way the disability rate is 13 percent higher than the national average. Specifically, the Northeast region has the highest percentage of people with disabilities of all regions at about 21 percent. It is also the region with the lowest median income and the highest poverty. Among the counties, Luce County in the Upper Peninsula, Montmorency County in the Northeast region, and Lake County in the West region have the highest disability rates among the covered counties at about 26 percent.
- In focus groups, participants cited a number of specific concerns that became thematic across the groups, including insufficient housing for individuals with physical and mental disabilities; criminal background checks resulting in disparate impacts for racial minorities; discrimination based on source of income; a need for greater education for small landlords about fair housing requirements; and lack of clarity around how to report fair housing violations and whether reports made result in change.
- Citizen respondents of the fair housing survey reported experience or observation of a number of barriers to fair housing choice, including a lack of decent, affordable housing that provides access to transportation, employment, and functioning public services.
- A regional assessment of citizen responses to the fair housing survey indicated a higher prevalence of some concerns in certain regions. For instance, the Upper Peninsula region indicated lower awareness of opportunities for fair housing education; the West region, which has the highest ethnicity percentage among the regions, reported lack of diverse representation on local boards as a greater impediment; and the South West region, which has the highest percentage of African-American residents among the regions, reported lack of knowledge of fair housing laws as an impediment.
- Survey responses by jurisdictions indicated that jurisdictions see societal impediments to fair housing as more widespread than outright discrimination. (Although it is noteworthy that nearly 20% of respondents have had residents report housing discrimination.) In particular, they point to

weaknesses in the affordable housing development market such as lack of capable developers and available development subsidies.

- The stakeholder survey asked respondents to indicate any awareness of questionable practices in various housing markets and policy areas. Half of respondents indicated awareness of such practices in the rental housing market, double the proportion of jurisdictional respondents. However, no more than 30% of respondents indicated an awareness of questionable practices in any other area. The stakeholder survey results overall demonstrated that stakeholder groups see more severe outright housing discrimination and societal impediments to fair housing than the governmental jurisdictions that receive funding from MSHDA. Of particular note, stakeholder groups have a much more critical view of governments' involvement in fair housing. The bases for discrimination were in many cases the same as those found in the resident survey and focus groups: source of income, race, disability, and familial status.
- Stakeholders and focus group members generally reported little awareness of the State's prior Analysis of Impediments or actions taken as a result. Fair Housing Center representatives in particular critiqued the lack of progress on prior recommendations. Yet in important respects, these critiques often focused narrowly on MSHDA while simultaneously pointing to issues—such as transportation policy, zoning decisions, building code adoption, etc.—that are the purview of other state departments and/or local government. Similarly, focus group members expressed concerns that that awareness of fair housing requirements often does not extend beyond the staff directly administering HUD funds to elected officials, building officials, and members of local boards (e.g. planning and zoning bodies).

Impediments

Demographic trends indicate that the State of Michigan has struggled significantly in the 21st century. While largely the result of macroeconomic forces beyond the control of state government, the state's population has been stagnant, experienced substantial increases in poverty, and is becoming older with higher rates of disability. While portions of the state are quite diverse, its rural areas are less so. Minority populations are more concentrated in southern portions of the state (often in the entitlement communities which are beyond the study area of this report). Despite some exceptions, poverty rates for most racial and ethnic minorities are higher than for whites, further limiting housing choice.

Even compared to its Midwestern peers, Michigan has higher rates of single-family housing stock and homeownership and less diversity of physical housing type. The foreclosure crisis has simultaneously reduced the homeownership rate, increased the number of renters, with much of the increase in rental housing supply coming from single-family structures, often owned by “mom and pop” landlords who may be less familiar with fair housing laws. Additionally, this housing stock is often least well-suited to the needs of an aging population or one with increased rates of disability.

As the state continues to come to terms with how to approach these challenges, it is an opportune time to build awareness of fair housing issues both among the housing ecosystem and across state government

broadly. To further inform the state's efforts, the principal findings highlighted in the section above can be consolidated into five topical areas:

1. Education and public awareness. Inadequate information on fair housing issues and a lack of understanding about the potential extent of housing discrimination exists especially in view of reported complaints (disability and race) and statewide lending denials (race and income). In addition to concerns about where to report complaints and questions about their outcome, particular effort may be needed to reach small self-managing owners of rental properties.
2. State and local government involvement. The lack of a broad-based recognition and understanding of the requirement to affirmatively further fair housing by "non-housing" portions of state government limits progress on these issues. Similarly, at the local level, jurisdictions are not actively involved in affirmatively furthering fair housing choice. Stakeholders believe jurisdictions are not doing enough to address questionable actions on the part of other industry players such as landlords, lenders, etc. In contrast, jurisdiction respondents seem to perceive societal impediments to fair housing and weaknesses in the affordable housing development market, such as, the lack of capable developers and available development subsidies as their primary concerns.
3. Poverty rate increase and impact. Poverty appears to have a disparate impact on African-Americans and other minorities, increasing at rates more than double the national averages in the new millennium. Combined with the lack of protection against source of income discrimination and emerging concerns about the likely disparate impact of criminal record policies among landlords, this further limits housing mobility and choice for many of the state's most disadvantaged citizens.
4. Housing affordability. The high cost of rental housing and extreme burden those costs place on tenants present a barrier to fair housing choice. While housing costs for homeowners has increased over the period studied in this report, the increase in cost burden for renters is nearly double the increase shown for homeowners, which indicates a particular need to focus specifically on actions that can be taken to assist renter households.
5. Disability and elder care issues. Availability and access to housing for individuals with physical and mental disabilities is an emerging impediment to fair housing and will likely increase as the state's population continues to age. This condition appears to be prevalent especially in regions with the lowest incomes, highest poverty, and greatest percentage of seniors (Northeast and Upper Peninsula regions). It is also notable that these rural regions have the highest percentage of detached single-family homes within the overall housing supply. They also, based on the proxy of high drive times to work, have widely dispersed populations with few transit options for those who cannot drive.

Recommendations

Concerns about fair housing have much in common with broader social discussions about race, sex, disability, religion, national origin, and the like. On the one hand, the topic of fair housing starts in most people’s minds with the clear prohibition against discrimination against individuals on the basis of these various classifications, essentially requiring that “thou shalt not discriminate.”

Yet, the Fair Housing Act does more than simply prohibit such discrimination. The language of the Fair Housing Act requires HUD and its grantees to confront structural impediments to fair housing choice, evaluating real-world outcomes and searching out seemingly “neutral” factors that have disparate impacts on minority populations—whether those populations be defined by race, ethnicity, disability, sex, or other protected factors.

In certain respects, the pathway of confronting issues of outright discrimination is relatively direct. The common prescription is a combination of education and enforcement – providing consumers with information about their rights, making sure industry participants understand the rules of the road, and use of testing and legal enforcement against those who violate or circumvent the law. Additionally, from this angle the “responsible parties” can be identified, and efforts to address housing discrimination can be assigned to or requested of government agencies (e.g. housing agencies, Department of Civil Rights, etc.), housing industry associations (e.g. realtors, developer trade groups, lenders, and the like), and nonprofit service and advocacy organizations (e.g. fair housing centers, housing counselors, etc.)

Identifying and addressing structural barriers is much more challenging. Determining specific cause and effect between seemingly neutral policies and disparate impacts is complicated and accompanied by some uncertainty given the number of potentially intervening and contributing variables. The “responsible parties” are less obvious and often driven by different professional perspectives that may leave them unaware of the fair housing implications of their work. Additionally, by their very nature, structural barriers are often embedded within the law itself, requiring both legislative and executive action to make meaningful changes.

In looking at the forces that shape structural barriers, transportation, zoning, and school policies arguably have more impact on creating and reinforcing segregation housing patterns than housing investments using state-managed HUD resources. Decision making in these areas is widely dispersed in Michigan, with literally hundreds of different units of government having control, which sometimes includes multi-jurisdictional overlapping areas. In other words, both the legal authority and the practical ability to drive reconsideration of the structural changes that might “move the needle” on key fair housing outcomes is not vested in MSHDA, the agency seen as directly responsible for “housing” issues at the state level. Still, MSHDA has a responsibility to ensure it integrates fair housing compliance in its own programs and is well-positioned to be a leader and liaison in advocating for greater fair housing efforts across Michigan’s programs and in its communities.

The 2008 Analysis of Impediments to Fair Housing was published at a time of extreme duress in both the national and, particularly, in the Michigan real estate market. The financial meltdown initiated by the foreclosure crisis affected all industry sectors, some of which have begun to rebound better than others.

While affirmatively furthering fair housing is a core requirement for receiving HUD funding and an important component of all housing and community development initiatives, the survival pressures faced by lenders, realtors, developer of affordable housing, and the community-based nonprofit sector often took center stage during that period. Combined with the public sector's rapid shift to stimulus based programs – more than \$1B in federal funding for programs that did not even exist when the last AI was being drafted was awarded to MSHDA between 2008-2010 – attentions were diverted in some respects from fair housing issues.

At the same time, HUD's recent re-emphasis of fair housing, combined with the attention given to the issue following the Supreme Court ruling in *Texas Department of Housing and Community Affairs v. The Inclusive Communities Project, Inc.*, requires MSHDA and the state government to more broadly and more robustly engage on issues surrounding affirmatively furthering fair housing. This Analysis of Impediments, in many ways, should be seen as a bridge to the new HUD requirements for an Assessment of Fair Housing (AFH). States will be required to submit an AFH ahead of any new 5-year Consolidated Plan due on or after January 1, 2018. Michigan's current Consolidated Plan runs through mid-2020. As a result, Michigan will need to plan to conduct an AFH for submission to HUD in mid-2019, which in turn will practically require efforts to start the new AFH process in 2018.

Various recommendations to be considered over the next two years are centered on two major areas: 1) Reinvigorating public education efforts around fair housing rights and concerns and 2) building a broader institutional awareness around state government's responsibility for affirmatively furthering fair housing, particularly by identifying and addressing structural barriers to fair housing choice.

With these considerations in mind and based on the findings and impediments identified above, the following recommendations are made and incorporated into the Action Plan steps in the following section.

Recommendation # 1: Increase Public Awareness of Fair Housing Rights

The State can strengthen efforts to make consumers, property owners, property managers, and lenders aware of fair housing rights and further emphasize how reporting fair housing violations can have positive outcomes. This would include providing communities information on fair housing laws and policies through training and facilitating increased dialogue on the issues. Particular attention can be given to reaching audiences through modern and compelling ways including using social media and public service announcements. Areas of greatest concern include training targeted for specific industries like realtors, lenders, and landlords, particularly small-scale landlords; in areas of greatest poverty and minority concentration; on the rights of people living with disabilities; and to explain and illuminate the ways that zoning, transportation, and school policies may result in disparate impacts.

Recommendation #2: Promote Greater Attention to Fair Housing Concerns Within State Departments and Among Local Jurisdictions

While the requirement to affirmatively further fair housing belongs to the state and not to any given agency, MSHDA can be a catalyst for fair housing discussions and strengthened actions among other jurisdictions at the state and local levels. MSHDA might consider incorporating fair housing discussions into existing intra-departmental working groups and/or establish a fair housing working group. MSHDA

could also advocate for the creation of specific sub-committee or other working committee coordinating among State agencies. At the local level, MSHDA can review its policy requiring local fair housing plans and take steps to better ensure that its grantees are implementing their responsibilities to affirmatively further fair housing in meaningful ways and that they are providing regular education opportunities.

Recommendation #3: Address Poverty Rate Increase and Impact by Targeting Services and Resources to Affected Areas

The State can create or strengthen partnerships between organizations that serve areas of greatest poverty to direct resources to those most in need. Partnerships for services might include job training/employment programs, medical and mental health support, child care, and food banks. MSHDA can also use its housing programs to support those living in poverty with housing opportunities. Finally, as noted, poverty appears to have a disparate impact on African-Americans and other minorities in Michigan, which may result in even greater vulnerability to fair housing violations. Education and training activities might be particularly concentrated in areas of greatest poverty.

Recommendation #4: Improve and Better Utilize Resources in the Development of Affordable Housing

High housing costs and cost burdens to buyers and, particularly, renters can be reduced through financial assistance programs. Consumers, realtors, lenders and rental property owners often do not know what is available and what the qualifications are for the various programs. All could benefit from more information on the availability of home financing and rental subsidy programs. The State might consider expanding its promotion of “missing middle” housing types to specifically encourage expansion of rental housing as a use by right, particularly for modest units. Further, MEDC might require evaluation of housing impacts as part of application for and consideration of various state economic development incentives, and similar approaches could be encouraged at the local level, for example when TIF financing is used to support projects locally.

Recommendation # 5: Increase Access to Housing for People with Disabilities

The State can gather more information on this emerging impediment and determine the extent to which the available supply of housing for people with disabilities is limited and the difficulties people with disabilities face in getting access to housing due to discrimination. Promoting best practices for alternative types of special needs housing, particularly in rural areas with high rates of disabled households, and considering policy changes may be in order. Shaping community attitudes through targeted education for consumers and property owners/managers, as discussed in the first recommendation, will be beneficial.

X. Action Plan

Critics or cynics can point to myriad public planning documents that have not been implemented. While such critiques are not without their merits, sometimes the root problem is that many plans are so focused as to be “precisely wrong” even if they were “generally right.” The Action Plan in this AI is intended as a starting point, not an end.

As the State works to reinvigorate and expand its efforts to affirmatively further fair housing, the broader environment will continue to evolve. Some planned actions may be rendered moot by other outside influences while others may prove unwieldy or ineffectual. New information may suggest the need to re-prioritize or introduce new steps.

As such, the specific steps below are intended as a starting point. In some cases, the steps relate to specific concerns identified as part of the AI – for example, unimplemented recommendations from the prior AI as well as ongoing confusion among focus group participants about how to report complaints about discrimination might be addressed by integrating this information into ever-expanding 211 systems rather than developing yet another new hotline.

In other cases, the steps highlight ways to draw more attention to fair housing outcomes within existing programs without yet knowing the specific mechanisms by which such outcomes can be improved. For example, one suggestion below would require applicants for broader economic development incentives to identify housing impacts of the jobs their projects may create. This takes advantage of what psychologists refer to as the “Hawthorne effect” by which individuals modify their behavior in response to their awareness of being studied, making employers more sensitive to how to connect their employees to housing or how to make new job opportunities accessible to segregated populations.

As the lead entity for the State’s various housing programs MSHDA will necessarily provide primary leadership in implementing this action plan as will the Michigan Economic Development Corporation as the balance of state CDBG recipient, but as additional elements of state government become more involved this Action Plan should be reviewed, adjusted, and updated.

Goal #1: Increase Public Awareness of Fair Housing Rights
A. Develop educational materials targeted to consumers and promotion plan including PSA-style approaches, social media, and efforts to cross-promote through other partners. Include information on fair housing issues that are sometimes overlooked such as disability, gender equality, and HUD’s recent guidance on the use of criminal background checks and quid pro quo sexual harassment.
B. Improve consumer awareness of resources for those who have been discriminated against. Determine viability of embedding reporting options into 211 protocols.
C. Develop targeted training materials for identified industry participants (e.g. lenders, realtors, property management staff, etc.) that can provide base-level fair housing training as well as periodic continuing education opportunities based on emergent issues and topic areas.

D. Given Michigan’s historic propensity for single-family detached housing, the additional conversion of single-family homes resulting from the foreclosure crisis, and concerns expressed in focus groups that “mom and pop” property owners are least aware of fair housing requirements, educational materials targeted to these property owners should be prioritized.
E. Develop materials for non-housing local leadership education addressing the structural ways in which land use/zoning, transportation, and school policies (e.g. schools or choice, school catchment areas, etc.) impact and interact with fair housing outcomes
Goal #2: Promote Greater Attention to Fair Housing Concerns Within State Departments and Among Local Jurisdictions
A. Incorporate fair housing discussions into existing intra-departmental working groups and/or establish a fair housing working group. The goal should be to get other departments—including Transportation—to integrate housing patterns into their planning and share their planning with MSHDA, MEDC, and others.
B. Consider creation of specific sub-committee or other working committee coordinating among MSHDA, Dept. of Insurance and Financial Services, Licensing and Regulatory Affairs, and other appropriate parties to address potential concerns about disparate outcomes in mortgage lending, the increasing use of subprime products, etc.
C. Explore methods of increasing home values in areas with deflated home prices and where it can be seen that disproportionate denials on the basis of collateral exists and the areas are underfunded and have poorly performing schools.
D. Require preparation of Fair Housing Plans by local jurisdictions receiving State HOME/CDBG funding and other grants that more specifically address steps to further fair housing choice and increase attention to implementation of such plans during monitoring.
E. Encourage local governments to use materials developed under Goal 1 and/or materials developed locally to support their own fair housing efforts.
Goal #3: Address Poverty Rate Increase and Impact by Targeting Services and Resources to Affected Areas
A. Continue and strengthen partnerships between organizations that serve areas of greatest poverty to direct resources to residents most in need. Seek input from advisory council and Continuums of Care on barriers to providing effective housing and social service supports that expand housing mobility.
B. Evaluate existing housing programs to identify mechanisms to better support housing opportunities for residents living in areas of concentrated poverty. Consider steps to maximize options for mobility when providing housing interventions in an effort to provide access to areas of greater opportunity.

Goal #4: Improve and Better Utilize Resources in the Development of Affordable Housing
A. More explicitly require consideration of fair housing concerns in local planning efforts in the Redevelopment Ready Communities checklist/framework.
B. Consider expanding “missing middle” promotion to specifically encourage expansion of rental housing as use by right, particularly for modest units.
C. Require evaluation of housing impacts as part of application for and consideration of various state economic development incentives. For example, consider how wages for new jobs relate to nearby housing costs (both rental and ownership), whether employees can be expected to afford housing within reasonable commuting distance, etc.
D. Build considerations into market study requirements that would require developers to be more aware of how projects are sited and ensure they do a better job of developing affirmative marketing plans.
Goal #5: Increase Access to Housing for People with Disabilities
A. Continue policies that give preference for accessible housing and encourage use of best practices (aging in place, retrofitting, visitability, etc.).
B. Target training/educational materials discussed under Goal #1 to topics that increase awareness of disability rights.

Appendix A: MSHDA Regions By County

This Analysis of Impediments to Fair Housing Choice focuses on the non-entitled portions of the State. As such, it generally excludes jurisdictions which receive Community Development Block Grant (CDBG) funding directly from HUD. The State has 45 jurisdictions—including 6 urban counties—which receive CDBG funding. Many of the local entitlement jurisdictions are also concentrated within urban counties, especially Wayne County.

To provide context to differing conditions and needs across the State, the AI include a series of regional demographic and housing profiles and analysis. These were sorted using “Prosperity Regions” defined and used by the State for various existing housing, economic development, and planning purposes.

The regional analyses were generally conducted by gathering county-level information on the list of selected indicators and aggregating that information to create a narrative snapshot of the region’s non-entitled areas as a whole. There are ten identified regions in the State’s rubric, several of which include CDBG urban counties and/or local entitlements (cities or townships). In many cases the demographics of entitlement jurisdictions are substantially different than the non-entitled areas surrounding them. To focus on the non-entitled areas then, it was generally necessary to remove those areas from the compilation and analysis.

However, some urban counties exclude small portions of their counties, and in other cases local entitlement communities represent very small portions of their county and/or broader region. For purposes of the regional profiles then, all six urban counties were fully excluded. And when local entitlement cities (or townships) represented more than 25% of their respective non-entitled county’s population, they were removed from the data compilation. Local entitlements that represented less than 25% of the county (and therefore an even smaller portion of the region) were left in the data set.

Further notes on this inclusion and exclusion process include:

- Macomb and Wayne counties are entitled counties in Region 10 that need to be excluded. Oakland, the remaining county in Region 10, includes the non-entitled townships of Novi and Southfield that could conceptually be included in a Region 10 analysis. A “regional” analysis for Region 10 based only on those two townships, which represent just 1% of the population of Oakland County and an even smaller percentage of the overall Region 10, however would have little value within the overall statewide analysis. So Oakland County was excluded as a whole meaning that Region 10 itself is not included for regional analysis purposes.
- Similar to Oakland, Genesee County, which would otherwise be excluded from the analysis, includes the non-entitled cities of Clio, Davison, Fleshing, and Lennon. As non-entitled cities, these jurisdictions could be included in the analysis of Region 6. However, because the combined populations of these cities is only 3% of the overall county and even less of the region as a whole, the entirety of Genesee County was excluded from the Region 6 analysis.

- Kent (Region 4) and Washtenaw (Region 9) counties are excluded in their entirety from the respective regional analyses.

Applying this methodology leads to the list below. Excluded counties are bolded. In counties where individual entitlement communities were excluded but the remainder of the county was included, the excluded communities are listed in parenthesis after the county name (and bolded).

<u>Region 1</u>	Ogemaw	Lapeer
Alger	Oscoda	Sanilac
Baraga	Otsego	Shiawassee
Chippewa	Presque Isle	St. Clair
Delta	Roscommon	Tuscola
Dickinson		
Gogebic	<u>Region 4</u>	<u>Region 7</u>
Houghton	Allegan	Clinton
Iron	Barry	Eaton
Keweenaw	Ionia	Ingham (E. Lansing, Lansing)
Luce	Kent	
Mackinac	Lake	<u>Region 8</u>
Marquette	Mason	Berrien
Menominee	Mecosta	Branch
Ontonagon	Montcalm	Calhoun (Battle Creek)
Schoolcraft	Muskegon (Muskegon, Muskegon Heights, Norton Shores)	Cass
		Kalamazoo (Kalamazoo City, Portage)
<u>Region 2</u>	Newaygo	St. Joseph
Antrim	Oceana	Van Buren
Benzie	Osceola	
Charlevoix	Ottawa	<u>Region 9</u>
Emmet		Hillsdale
Grand Traverse		Jackson
Kalkaska	<u>Region 5</u>	Lenawee
Leelanau	Arenac	Livingston
Manistee	Bay (Bay City)	Monroe
Missaukee	Clare	Washtenaw
Wexford	Gladwin	
	Gratiot	
<u>Region 3</u>	Isabella	<u>Region 10</u>
Alcona	Midland (Midland City)	Macomb
Alpena	Saginaw (Saginaw City)	Oakland
Cheboygan		Wayne
Crawford	<u>Region 6</u>	
Iosco	Genesee	
Montmorency	Huron	

Appendix B: Focus Group Records

Grand Rapids Focus Group

Attendance

- Lola Audu, Audu Real Estate
- Michelle Brothers, Ottawa County CAA
- Brianna Flowers, Bridges of Hope, Allegan County
- Renae Gordon, Senior Resources of W. Michigan
- Gail Hill, Bridges of Hope, Allegan County
- Paula Huyser, Ottawa Co. Comm. Action Agency
- Deb Kupres, Allegan County CMH
- David Layne, Michigan Disability Housing Workgroup
- Karen Leppek, Area Agency on Aging W MI
- Carol Pompey, Emergency Shelter Services
- Denise Price, Reliance Community Care Partners
- Stephanie Rutherford, Emergency Shelter Services
- Jennifer Scally, Region IV Area Agency on Aging
- Jillian Wiesemes, Emergency Shelter Services
- Tara Wilkes, Allegan County CMH
- Jane Yang, Emergency Shelter Services, Inc.
- Nancy Haynes, Fair Housing Center of West Michigan
- Jaime Laisure, Intercare Health Clinic

TDA Facilitators:

- Steve Lathom
- Jennifer Alpha
- George Martin

MSHDA Observer:

- Mike Fobbe

Focus Group Summary

- Did not see tangible outcomes from previous Analysis of Impediments
- Most discrimination for these reasons: disability, familial and marital status, race, national origin
- Tight rental market in Western Michigan exacerbates usual issues involving protected and other vulnerable populations
- Busy real estate market has also given rise to questionable practices in this market
- Resources for fair housing education have diminished. Official education efforts are token and/or outdated.
- Confusion among public and service providers about where to report violations. Lack of transparency and effectiveness of enforcement.
- Variety of legal issues: some classes (e.g. LGBT, source of income) unprotected by law; local rule system invalidates efforts by counties; lack of awareness in planning and zoning commissions.
- In general, those with disability and other special needs likely face the hardest battle to find housing. This issue is undeniably linked to issues in the general rental market.

Complete Record of Focus Group, by Topic

Previous Impediments

- Responsibility even in hard financial times (referring to immediately after previous Analysis of Impediments was completed) to further fair housing. MSHDA did not follow up on many of recommendations of the previous report. The hotline for fair housing complaints is an easy example.

Most Prevalent Current Impediments

- Disability
- Familial and marital status
- Race
- National origin

Impediments in General Rental Market

- Tight rental market in western Michigan. Before the crash, landlords would take anyone could pay, but in a tight market they will pick classes they want to rent to (usually white, married, etc.).
- Almost impossible to find affordable rental units. And it is even harder for the protected classes.
- Landlord who work with housing placement programs will directly ask “will you send me someone good.”
- Landlords are setting income limits far above the rent (e.g. three times rent amount). Even if we can prove that all the rent will be covered, they are denied. This is meant to exclude anyone with a housing voucher or subsidy.
- Some landlords refuse to rent to anyone with a roommate who is not a legal family member. And in the economic environment and tight market people really need to live with roommates.
- One questionable practice: Landlords will demand that the applicant pick up an application in-person. This often relates to disability, but could affect other classes as well.
- Unsurprisingly there are also problems with those exiting prison finding rental housing. Landlords will just refuse outright to take them.

Impediments in Real Estate and Lending Markets

- Real estate market is so tight that homes are not even listed. Families will resort to making a flyer with biographical information and photos, and go paper a neighborhood with them so maybe a current homeowner will sell to them. And realtors are putting similar things on their websites.
- Realtors have cooperative agreements outside of the Multiple Listing Service. And these realtors have no awareness of the questionable fair housing practices related to doing this.
- In the lending industry, there was one case of a bank asking people to prove that they will have income for years into the future. How is it possible to guarantee that unless you’re extremely wealthy already?

Education/Outreach/PR

- Need for fair housing education has skyrocketed, but there are no resources to provide this education.
- A review of senior marketing materials in Kent County found questionable practices in around 95% of materials. Many, for example, only showed white people living at a development.

- Landscape has changed since 2008. In real estate, for example, at that time maybe 70% of training was done online, now it is 99%. This has made fair housing education for real estate agents more difficult. The industry has completely overlooked the issue of fair housing.
- One positive in this area is Bethany House. They work with refugees in Western Michigan, giving them fair housing information, loan education, etc. The clients feel empowered getting this information.
- Could improve fair housing lunches by having victims of discrimination speak.
- At one fair housing luncheon, a property manager told me he only comes for the food since everyone in the field break the rules.
- In Berrien County, only action is once-a-year meeting to realtors and property managers. No effort to inform consumers. The Fair Housing Center does its part, but no one else is involved beyond the mandatory meeting.
- There are several “bullhorns” on the issue right now: the new mayor of Grand Rapids addressed fair housing in first speech, and the state Planning Association’s issue of the year is housing. We need to take advantage of these to spread awareness.
- Need new ways of getting the message out. Pamphlets and flyers are outdated, need to move to social media. For model, look at videos produced by Consumer Financial Protection Bureau.

Reporting and Enforcing Violations

- Even working at a social services agency I find it hard to determine where I can and should report fair housing violations.
- The biggest issue is that when we do report violations, no action comes from it.
- Fair Housing Centers do not receive enough funding to allow them to do better follow up and enforcement of violations.
- People are unaware that they are being discriminated against, and when they do know, they are fearful of making a claim.
- Furthermore, how do you prove a fair housing violation? You need testing and other studies, and these practices are generally unfunded.
- Seconded, testing needed so landlords/realtors can experience firsthand what their violation. It is often unintentional, and handling the testing correctly can resolve the issue with no animosity from the landlord or realtor.
- Obviously not possible, but in ideal world I would have testers for every housing complex or neighborhood.
- We have been told that clients need to report issues themselves, and this is problematic when dealing with clients with mental or physical disabilities.
- No issues reporting violations, but then no follow up. I even offer to help, and never hear back.
- Would be more helpful if there was one place or phone number, statewide, to report. Now some people report to MSHDA, others to Civil Rights.

Legal/Zoning/Planning Impediments

- In Benton Harbor, the city manager decriminalized code enforcement on landlords. This effectively ended fair housing enforcement by the city there.
- The fact that source of income is not a protected class (either statewide or nationally) is extremely problematic.
- “Local rule” means that counties can have their own protection laws (like including source of income as protected class), but municipalities don’t necessarily need to follow this—they can have their own differing laws.

- This also includes sexual orientation. Municipality has to pass ordinance about for this to be protected. And this is getting confusing since gay marriage is now legal.
- LGBT needs to be added as a protected class statewide. There are some local ordinances against this discrimination, but they just allow civil action (i.e. fine) against the violator, who is then free to continue the practice.
- Cities should be looking at fair housing as part of their master plans. Take Grand Rapids, adding 5000 units on the river front, but there is no discussion of income, disability, etc. All about making the river front beautiful, which is problematic with that number of units.
- Planning commissions have a lack of knowledge about these issues, they tend to just be interested local citizens. Training for planning commissioners would be very helpful.
- Statewide inclusionary zoning.

Impediments for those with Physical or Mental Disabilities and other Special Needs

- Issues with disabilities standards across the spectrum of affordable housing programs. Every tax-credit unit should be accessible but only half are. The State helped and added points to the QAP to encourage 10% dedicated units (up from required 5%) and more than 80% of applications got these points. But this is a drop in the bucket. Also for Section 811 the state received much fewer proposals than expected.
- Architects still don't understand the standards for disability. Our Fair Housing Centers will investigate, but this is really an issue that should be resolved before expensive retrofits are required.
- Since demand for rental units is so high across the board, there is no incentive for landlords to look toward special needs renters.
- No housing available for those exiting a nursing home, so people never leave. And then that bed isn't open for another senior. Disability Rights Coalition did study that found 400 individuals were sitting in nursing homes waiting for units. In other cases, landlords assume if they are exiting a nursing home they can't care for themselves.
- Homeless housing: MSHDA pushes the housing first model, but there is no way to get landlord to take people right off the street.
- Senior housing: Senior housing often goes through same NIMBYism as supportive housing, which is shocking.
- Another issue is service animals for both physical and mental disability—property managers don't understand the rules around these.
- For mental health specifically, landlords say "if they need a dog for therapy, how can they live on their own?" And then client gets in the habit of knowing they will be denied, so stops looking for unit.

Impediments and Strategies Involving Non-English Speakers

- What languages are spoken in the region? Spanish, Vietnamese, Sudanese, Bosnian, Serbian, Congolese, Arabic, French Creole.
- Deaf and hard of hearing support is needed as well. These folks are also discriminated against in great numbers.
- We hire interpreters when needed. But this is at least \$500 extra dollars each time. How can we better facilitate or fund this?

What would you do to further fair housing if money was no object?

- Pool of money that clients could tap into to meet the costs of applying for housing.

- Bring landlords and property owners to the table. Incentivize compliance, or charge bigger penalties. The point is to actually enforce violations.
- Entice new developments with education about the opportunities available.
- Grand Rapids has an initiative called Great Housing Strategies that bring all stakeholders to table. Would be good to replicate.
- More funding for barrier free housing. There is a gap between prices and resources for accessible units. For a long time, the State and market ignored disability and focused on seniors. Now they are trying to catch up, but are neglecting senior housing.
- More accessible and affordable units with more than one bedroom.
- Outside of strictly housing, would like to see more focus on place-making industry in planning and architecture.

Jackson Focus Group

Attendance

- Andrea Brown, Michigan Planning Association
- Emily Thompson, Community Alliance
- Lillian Thompson, Detroit Area Agency on Aging
- Erica Zimny, Legal Services of South Central Michigan

TDA Facilitators:

- Steve Lathom
- Jennifer Alpha
- George Martin

MSHDA Observer:

- Mike Fobbe

Focus Group Summary

- Note: Focus group held via conference call due to weather conditions.
- Need for inclusionary zoning, and other legal solutions, such as restrictive definitions of family
- Need for education among various stakeholders: homebuilders, landlords/managers.
- May issues related to housing for those with disabilities and seniors.
- Worries about lack of affordable housing generally and impending end of affordability periods.

Complete Record of Focus Group, by Topic

Previous Impediments

- Enforcement of accessibility standards is still an issue. Many older buildings made before ADA so not accessible.
- In 2008, the state was updating its zoning act, but no substantive changes were made to reflect fair housing needs.

Impediments in General and Subsidized Rental Market

- Really hard to find people who accept Section 8 vouchers. Also if you're asking for anything to get repaired or to get an accommodation, it takes a very long time. No respect for Section 8 vouchers because they are at the whim of the landlord.

Reporting and Enforcing Violations

- Fair Housing Center in downtown Ypsilanti is the only place to report. They also do advocacy and do testing.
- We make referrals to Legal Services of SE Michigan for things like landlord tenant disputes. They have done a great job dealing with these.

Legal/Zoning/Planning Impediments

- Michigan Association of Planning (MAP) is looking at solutions like inclusionary zoning. This would shift conversation towards affordable units (and maybe away from protected classes). Has been trying to work with legislature on these issues. That said, no specific legislation in the works.
- MAP has dealt with family law issues for years—how many people can be in a unit, do they need to be related, etc. MAP does things like educate, provide advocacy with legislators and other organizations, and provide best practices to planners.
- Been dealing with legal definition of family for decades. Local ordinances make restrictions by defining a family unit. Trying to keep out group homes. In college towns trying to keep out Greek life, and rooming houses.
 - Example: Ypsilanti has tried to use family definition to try to restrict group homes because they felt they had too many in the city.

Education/Outreach/PR

- Issues with architects and building departments not understanding accessibility standards.
- MAP is working with American Association of Retired Persons (AARP) to get word out about universal design standards. Baby Boomers are a receptive audience, and universal design helps many populations, not just seniors.
- Home builders are very much in need of training. Maybe best way to contact is through their professional association (home builders' association, Urban Land Institute (ULI)).
- MAP will send their document that includes stuff on fair housing. Would like advice on fair housing portion from experts. Would love to work with others to do anything.

Impediments for those with Physical or Mental Disabilities and other Special Needs

- Extremely hard to find affordable, accessible housing for those with disabilities.
- Direct care workers have to do so much more to help clients. For example, people in wheel chairs have kitchens that don't allow them to cook. Care workers end up needing to look for an unattainable kitchen.
- Legal services has an overwhelming number of service animals cases at any one time. These include emotional support animal cases.
- Landlords and management companies tend to be unresponsive when you ask for a reasonable accommodation. And when they do feel forced to work with you, they drag their feet on doing the work.
- Very hard to find accessible housing for those aged 18-61. Minors and seniors have a bit easier.

Impediments and Strategies Involving Non-English Speakers

- Area non-profits work within the different communities to find translators.
- No additional languages to add to those listed in other focus groups.

Broad, Societal (Non-housing Specific) Impediments

- The Michigan Housing and Community Development Fund continues to be unfunded.

- Affordability period for many affordable housing developments will expire soon, so we may lose much of our stock of affordable housing units.

Lansing Focus Group

Attendance

- Nichole Beard, Tri County Office on Aging
- Hannelore Dysinger, Crawford County Housing Commission
- Kathie Feldpausch, Michigan Realtors
- C.J. Felton, Community Housing Network
- Vicki Hamilton-Allen, Habitat for Humanity Capital Region
- Maureen Norman, Complete Counseling Center
- Julie Powers, Greater Lansing Housing Coalition
- Jim Schaafsma, Michigan Poverty Law Program
- Jamie Schriener-Hooper, CEDAM
- Ashley Yoshizaki, Washtenaw Prisoner Reentry - CSSW
- Patricia Baird, Legal Services of Eastern Michigan

TDA Facilitators:

- Steve Lathom
- Jennifer Alpha
- George Martin

MSHDA Observer:

- Mike Fobbe

Focus Group Summary

- Recommendations from previous AI not instituted.
- One of most glaring impediments is private land contracts that are not transparent and lead to abuses by slum lords.
- Other glaring impediments include unaddressed lead paint issues, unrealistic FMRs, and advertising violations by sellers in real estate market.
- Need easier reporting of violations and more fair housing center resources, especially in Northern Michigan. Specific issues reported with reporting to Civil Rights.
- All parties in rental and real estate market need education: renters, buyers, landlords, and realtors.
- A variety of zoning and local ordinance issues perpetuate discrimination.
- Senior housing is very important issue in this part of the State. Not enough affordable housing for seniors.
- Non-English Language services too focused on Spanish and Arabic; need assistance for a variety of other languages.
- Variety of broader societal issues affecting fair housing: lack of public transit, changing education landscape.
- Areas not receiving attention: Northern part of state lacking resources of south; state of housing is still deeply segregated, which needs to be addressed.

Complete Record of Focus Group, by Topic

Previous Impediments

- Familial status issues, including legal definition of family, is still relevant today.
- Housing stock inventory is still important. The results of a true inventory would be a wakeup call to the State.
- Recommendation #1 on previous report said make changes so communities “can” embed fair housing practices at all levels. This should read “must”!

Impediments in General and Subsidized Rental Market

- Private land contracts are a huge issue. These are contracts for deeds sort of like a lease-for-purchase, intended to avoid the transparency associated with traditional mortgages. These are almost exclusively used by slumlords to charge usurious rates to classes who can’t find other housing—released prisoners, refugees, etc. In many areas where this is prevalent, code enforcement is trying to figure out how to resolve.
 - Need the legislature to mandate that these contracts get treated as other real estate transactions—make them transparent.
- Lead paint poisoning is an ignored issue. In Ingham County alone, 1800 children have been poisoned. The programs to mitigate this are spotty and inconsistently available. Need huge commitment on the state level to remediate lead paint.
- With rental assistance market, fair market rents are always too low. Especially so in some parts of State, e.g. Grand Traverse County. MSHDA should try to join HUD’s Small Area FMR demonstration program.
- From the other side, need to enforce abuses of Housing Choice Vouchers (HCVs). Waiting lists and no movement year after year. People have vouchers and can’t use them, so they just hold them. Trying to transfer vouchers is very difficult. Or can’t find landlord. Enforcement on people who hold vouchers.

Impediments in Real Estate and Lending Markets

- Client narratives (by seller) seeking to describe home and neighborhood, ends up excluding possible buyers. Certain words that are used in advertising are blatant violations.
- State Realtor Association is getting word out about how advertising affects properties, as well as not putting proper information in listings. Also looking to use social media to spread word. In the past, Realtor Association worked with FHCs on testing, and would do so again.

Reporting and Enforcing Violations

- Need to expand capacity to track fair lending practices.
- Need Statewide hotline and internet portal for reporting complaints. 211 does not work!
- In terms of enforcement, it would be nice to see a law firm willing to take on some fair housing cases.
- There are only five Fair Housing Centers in Michigan, which is not enough. There is nothing in the northern part of the state. MSHDA should require that at least one person in each municipality be trained in fair housing.
- Most people do not want to report violations, or follow up if they do report. There is fear of retaliation.
- Need better way to report violations. In townships, the boards that you can take complaints to are usually made up of landlords and property owners who have a vested interest in the complaints going away. Maybe need to mandate fair housing officer on each board.

- Second hand report about MI Civil Rights: many people upset with handling of fair housing complaints. It is driven primarily to reach conciliation agreements, rather than fully investigating fair housing complaints.

Education/Outreach/PR

- There is virtually no education available to renters on fair housing. Mortgage borrowers need to get some sort of education if federal funding is used, but nothing mandated for renters, even those getting HCV or other subsidy.
- Partnerships and cooperation very important.
- Landlords and sellers need to be trained in fair housing. Many are well intentioned but just do not know the law. It would be easy to make fair housing training a condition to get certified to lease property. Specifically, education needed for landlords on reasonable modification and accommodation.
- One population that really needs education is prisoners as they near release. Not just fair housing issues, but basics about renting.
- In non-entitlement area, MSHDA should have a menu of AFFH practices. Way to educate stakeholders about their responsibilities. Offer concrete steps.
- Need access of resource pool or description of what different agencies and organizations do. We work in silos and may be duplicating services or missing partners who could be helping us.
- PR: HUD sends out announcement about fair housing settlements maybe 12-15 times a year. Just tip of iceberg.

Legal/Zoning/Planning Impediments

- As mentioned with impediments from previous report, legal definition of family can be a huge impediment. One community in Livingston County passed an ordinance that defined family in a way that excluded participants in prisoner reentry programs.
- In the Tri-County area, there are many communities with ordinances that deem two or more unmarried women living together a brothel. This is also the case in Alma.
- Nineteen municipalities have human rights ordinances that affect other classes, including sexual orientation, source of income, veterans, etc. Housing providers in these municipalities must treat these classes as protected, but some faith-based operations are unaware (or unwilling) to follow.
- More generally, what is the use of an ordinance if it is not enforced? Only local government can enforce its own ordinances, but they often don't have the means or will to do so.
- Zoning issues: many communities moving to form based code. And need to look at the placement of urban service management boundaries. Also, zoning ordinances don't mention anything about reasonable accommodation and modification.
- One problem with trying to address impediments via zoning and ordinances is that many interest groups are opposed to these efforts. Examples:
 - Assn of Counties, Assn of Townships against zoning efforts because they claim there are too many regulations already to enforce
 - Landlord and realtor groups argue efforts make sales harder
 - Chamber of commerce also opposed
- Silo-ed decision making at the local level. In the Tri-County area alone, there are over 1100 boards, bodies, and commissions that govern local funding.
- One side of MSHDA has talked about place making, but then in the QAP developers are trying to do mixed-income and not allowing what the other side is talking about. Other states have great

developments where you can't tell which units are affordable and which are market, but in Michigan this never seems to happen.

- Other QAP issue: walk score. The walk score data is skewed to keep development out of white neighborhoods.
- Need to make it mandatory for all developers to have certain percentage of housing for low-income. Or mandatory for county to have certain percentage of affordable.
- Criminal background policies for public housing is a huge barrier. Family members lose unit if they let released prisoner live with them. Need some education around this because for HUD units it is only violent crimes, sex crimes, and drug crimes that this applies to, but most think it is all crimes. Of course private landlords will deny based on criminal record and there is no way to stop them.

Impediments for those with Physical or Mental Disabilities and other Special Needs

- Disable housing is huge. Affordable housing so hard to find already, then add disability on and it becomes even harder.
- Related to the education piece—we need training for landlords on reasonable modification and accommodation. Renters don't know they have rights, and landlords don't know that they need to comply.
- Zoning ordinances missing reasonable accommodation and modification.
- For those who are aging, they may never leave a nursing home because there are no affordable units available.
- In Tri-County area specifically, biggest issue of all may be accessible, affordable housing for seniors. Zoning laws will prevent seniors from making own homes accessible so they can age in place. Or there will be ordinances against live-in help (fear of “those people”). Also tons of push back against group housing (NIMBYism), unless it is in low income tracts.
- The rules for homeless housing programs are burdensome and restrictive.

Impediments and Strategies Involving Non-English Speakers

- Too much focus on Spanish and Arabic. No other languages offered.
- German is #3 language in Lansing area, then Mandarin.
- Other languages needed: French Creole, Swahili, languages of Myanmar.
- In Lansing, currently a fair housing violation case about steering of Chinese students into certain areas
- In immigrant communities, children are often asked to be translators, negotiations, and decision makers.
- Refugee Development Center in Lansing is a good resource.

Broad, Societal (Not Housing Specific) Impediments

- The commuting issue: Availability of affordable housing close to transportation, or even close driving routes to job centers. There is absolutely no affordable housing in some of these areas; in general the more north you go in state, less transit. And of course rural areas have no public transit.
- Entitlement communities often have competing programs with different eligibility. Residents don't know which programs are best for them, or even what they are eligible for.
- Data collection and accountability. CEDAM has tried to track foreclosure data, but MSHDA wont fund getting most reliable data. Related: MSHDA requires people doing foreclosure counseling

to provide foreclosure data, but MSHDA fails to release data! Self-defeating circle where agencies try to use their own data, but then reports to MSHDA look incomplete.

- The previous AI avoided using the word “segregated,” which is unfortunate because that is what it is. Integrated housing is the same, if not worse, than in 1968 when the Act was passed. MSHDA should make a commitment to make more affordable housing available in high opportunity areas. Ideas to address: siting of LIHTC, disparate impact/treatment cases.
 - One specific area: scattered site public housing is usually located in the same types of census tracts: 80-90% African American. Need to put these in different areas.
- The State does not spend any of its own money on affordable housing, it is all pass through. We have an affordable housing fund, with absolutely no money. When we were able to use it in the pass, it leveraged 11 dollars of private funding to every one dollar of government.
- Because of Prop A, many school districts moving to school choice. Higher performing schools do not have a transparent process, so you end up with lower performing schools with the brunt of special needs, etc. And this issue is exacerbated by realtor steering.
- Northern Michigan does not have nearly the same access to resources available in the southern part of the state. In Upper Peninsula, for example, almost no resources available.

Fair Housing Centers Focus Group

Attendance

- Fair Housing Center of Western Michigan:
 - Nancy Haynes, Director
 - Liz Keegan, Director of Outreach and Education
 - Elizabeth Stoddard, Director of Advocacy
- Fair Housing Center of Southeast and Mid-Michigan:
 - Pamela Kisch, Executive Director
 - Kristen Cuhran, Assistance Director
- Fair Housing Center of Metropolitan Detroit
 - Margaret Brown, Executive Director
- Consultant to Fair Housing Centers:
 - Maryellen Lewis
- MSHDA:
 - Mike Fobbe
- TDA:
 - Steve Lathom
 - Jennifer Alpha
 - George Martin

General Notes:

- Meeting scheduled to take place at MSHDA Building, rescheduled as conference call due to inclement weather.
- Detroit FHC asked that Analysis look at the entire State.

What is the same and different from last Analysis (2008)?

- In general, FHCs know of no efforts MSHDA has taken since the 2008 Analysis to pursue the recommendations of that report, or even to address fair housing generally.
 - Some of the FHCs held follow up meetings with MSHDA for 3-4 years after the meeting, but nothing seemed to come of this.
 - While times were tough after previous report, still no excuse for not meeting commitments to furthering fair housing.
- FHCs are first line of support on the issue, and the State has not made a commitment to support FHCs. A poll of FHCs in other states shows that Michigan is glaringly different in this regard.
 - MSHDA used to contract with FHCs to do testing, but this no longer happens. FHCs are the most qualified in the state to do this.
 - It is telling that FHCs have no idea what State is doing regarding fair housing. FHCs have submitted fair housing topics for presentation at MSHDA conferences and these are almost never selected.

Areas of Discrimination

- In terms of most common complaints, this has changed little from 2008:
 - In Southeast: physical disability, race, and mental/emotional disability rank highest.
 - In Detroit area: families with children, disability, and race are highest. Often complaints about joint race and disability discrimination.
 - In West: similar to other regions—race, disability, and familial status. But also age discrimination: against seniors around Grand Rapids, but against young people around Traverse City.
- Any elevation in discrimination by religion and/or national origin? Hard to identify due to lack of funds, but there is one major case gathering now. There is probably more of this and the record of complaints shows.
 - Definite discrimination against Native Americans throughout State
- FHCs have received complaints of housing discrimination by contractors/grantees of MSHDA. This needs to be addressed.
- FHCs happy to provide complaint data to TDA by county. TDA can send request to all FHCs so submission would be uniform.

Impediments in Rental Market

- Huge issues with single mothers not able to get rental housing. Heard reports that this problem exists all over state, especially in Upper Peninsula.
- Landlords do not understand reasonable accommodation and modification.
 - Specifically issue of service animals—landlords do not understand difference between pet and service animal.

Impediments in Real Estate and Lending Markets

- Uptick in lending discrimination, especially against women and racial minorities. Some of these problems even come from homebuyer programs funded by MSHDA.

- Data (i.e. HMDA data) may not be much help in rural areas, but anecdotally FHCs have heard of mortgage discrimination against women in Kalamazoo area.
- People tend to forget that fair lending is part of the fair housing conversation. Need to establish this further in State's marketing efforts.
- Home insurance discrimination as well: widely different rates offered between black and white testers in the Detroit area. And other FHCs have heard the same anecdotally.

Education

- In general, much more fair housing education is needed throughout State.
- Need to work on ways for small communities to get their leaders (in government and housing) interested in fair housing. Very little interest or knowledge in more rural areas.
- MSHDA used to mandate fair housing training for all employees, but it doesn't sound like this is happening anymore.
- Need education on affirmative marketing of fair housing. Most stakeholders in state unfamiliar with this concept.

Reporting Violations/Enforcement

- Many times local government and services employees do not know that they are expected to report fair housing violations.
 - Woman in Upper Peninsula who reported issue with discrimination against single mothers had no idea she was expected to report this. Fair housing is not included in any of the paperwork or administrative processes for her job.
 - Those reporting violations to FHCs are generally educated social workers. Seemingly no one from MSHDA grantees are aware of their responsibility to report violations (much less affirmatively further fair housing in other ways). These providers need fair housing training.
- Need to set up common hotline for reporting fair housing violations. This was a recommendation of the 2008 report that was never acted upon. This could clear up confusion about reporting.
- State needs to work on statewide fair housing entity that includes enforcement mechanism. One idea is to have officials who travel around state hearing cases and providing some sort of enforcement. Fair housing centers can't enforce the rules.

Broader Structural Issues

- Local ordinances are major issue. Need to find ways to get local governments to be more inclusive.
 - One example, ordinances stating that developers must promise to never allow Section 8 housing in a development. FHCs have worked with Michigan Builders Association on this.
- Regarding Section 8, there is clear evidence of steering of those with vouchers into predominantly African American communities. This should be an asset the State and other

grantees can market to housing providers—highlight this is a benefit that guarantees payment every month.

- Southeast Michigan Council of Governments is doing a major transit initiative. How can we make this intersect with needs of fair housing community?
- Zoning issues. Specifically related to sober houses and wet houses, and also related to the emerging issue of medical marijuana.

Partnerships to Further Fair Housing

- FHCs currently work with:
 - Michigan Association of Realtors
 - Michigan Builders Association
 - Michigan Association of Planning
 - Michigan Municipal League
 - Habitat for Humanity
 - Community Reinvestment Officers of various counties
 - Law enforcement groups
- Ideas for possible future partnerships:
 - Developers who get funding from MSHDA: requirement that they work with FHCs would be helpful
 - Small businesses and home based businesses which would fall under fair lending portions of fair housing law
 - Local Chambers of Commerce
 - Local community/economic development agencies
 - MSHDA itself—add fair housing component to existing trainings that they deliver.

Impediments Related to Non-English Speakers

- FHCs need testers that speak different languages and of different ethnicities.
- State and local housing websites don't have information about fair housing in English, much less in other languages.
- Influx of Syrian immigrants/refugees will require more materials and support in Arabic.
- FHCs offer translation (funded by HUD), and some have Spanish speaking staff. Other languages require hired translator or community members.
- Need to look at emerging immigrant populations, and determine which languages are needed most.
- American Sign Language and braille both present other challenges.

MSHDA Regional Meeting Notes

Looking back to 2008 and ahead to the current AI

- Wondering how many fair housing complaints are related to lending. (Answer from TDA: Not many. Lending complaints are rare.)
- Landlords have little knowledge of fair housing responsibilities. Need more education for landlords and property managers.
- State needs more regional fair housing centers where folks are able to educate those in the field as well as consumers and landlords. As housing providers, we need more options for the protected classes, like disability networks that have been established. And we need more education on what protected classes need, and how to get resources to meet them. More partnerships.
- Emphasize need for the above in rural areas. Some of what is happening in rural areas is absurd. There are so few resources in these areas.
 - Where are rural issues in terms of which protected classes? Familial status and source of income.
- All recommendations from past AI are still valid. In tight markets, like Grand Rapids, fair housing issues gone by the wayside.
- Homeowner insurance rates extremely high, and some insurance companies say they will not insure old homes, which is basically redlining.
- Another issue is getting the existing available resources to the populations who need them. Recommendation: clearing house for specific regions. Certain people, seniors, vets, etc, have much assistance available to them, but they don't know it.
- All grantees are supposed to have fair housing log, and this might be an opportunity to look at activities on these.
- Those who administer public funds do a better than average job letting their clients know they have rights. The private sector does not do this, and this is a huge concern.
- Statewide association of planning includes policy on supporting inclusive zoning. Can we get draft language to provide municipalities to use for ordinances?
- Rental situation in rural areas—it is not quantity, it is quality. Many slumlords. Code enforcement is a huge issue. Hard to get small communities to adopt rental codes.
- Some rural areas are adopting rental codes. Local city manager and councils and township management need to be brought into the conversation.

What types of training/education is there now, and what is needed?

- Need training for both consumers and property managers.
- Pretty much everyone follows Michigan building code, is there anything in there that addresses fair housing?
- Training in regional centers is great, need more. SW Michigan FHC is great, they go to all CoC meetings and also hold landlord forums and meetings to get message across. The regional centers have lost some funding, but they are so helpful because grantees cannot do this work.

- Training on section 3 needed.
- Already being done: some contractor sessions about homeowner rehab, allow for discussion of changes to code, etc.
- The physically and mentally disabled do not understand the severity of the issues involved with their homes. They need a voice to go to authorities to report issues.

Reporting and enforcement

- Issue you will never get around is pay for inspection. Typical rural county has two building inspectors. If no building code, typical local elected officials don't care about code enforcement. No complaint system set up. Need to advocate to local officials to find funding for inspections. Benefit for actually having inspections is higher property values.
- Most report to Michigan Civil Rights Department.
- Landlord-tenant handbook is informative for public. Many cities will have them in their lobbies. This gives folks a start.
- Landlords shouldn't be scared of this if they are doing their job the right way.
- How to handle illegitimate fair housing complaints? One nonprofit lost insurance because of a false lawsuit. Need to figure out how to use common sense.
- Working with technology. There has been conversation about creating viral content/memes for online visibility. But have to be careful about relying on technology because there is a digital divide, especially with seniors and those in poverty.
- How much testing is being done? FHCs can do this. But they would need more funding to do enough of it.
- Lansing area CoC is reaching out to larger places of worship, they hear complaints more often than agencies. So know they know how to refer their congregations to proper resources to address issues.
- Include MSHDA homebuyer counselors in surveys.

Training/outreach suggestions:

- Young professional groups
- Religious organizations
- Neighborhood centers/associations
- Veterans Groups
- AARP MI
- Refugee organizations
- LGBTQ organizations
- Disability organizations
- MI Association of Realtors
- MI Associations of Planners
- Libraries
- Universities/colleges
- Ethnic organizations
- Legislators/staffers

Appendix C: Survey Questionnaires

Introduction

The Michigan State Housing Development Authority (MSHDA) requests your participation in a brief survey designed to identify impediments to fair housing in the State of Michigan.

MSHDA has prepared three separate surveys to collect perspectives from (1) jurisdictions that receive funding from MSHDA; (2) non-governmental organizations familiar with fair housing laws, housing conditions, and/or community programs in Michigan; and (3) residents of the State. By making a selection below, you will be directed to the survey tailored to collect each of these perspectives.

NOTE: If you are answering on behalf of a jurisdiction or non-governmental organization, then please answer using the perspective of your organization as a whole. If you would like to provide your personal perspectives and are a Michigan resident, then you may complete the resident survey as well.

1. Please select the one option below that best describes you. Your response will determine which survey questions you will see.
 - a. I work for a jurisdiction (i.e. local government) that receives funding from MSHDA.
 - b. I work for a non-governmental organization familiar with fair housing laws, housing conditions, and/or community programs in Michigan.
 - c. I am a resident of Michigan. I will respond to this survey with my personal opinions, and not those of any organization.

2. Select the County in which you reside
 - a. [drop down list of all Michigan Counties]
 - b. Other (please specify)

Resident Survey for Michigan Analysis of Impediments to Fair Housing

Thank you for your interest in completing this survey on resident perspectives on fair housing.

MSHDA is actively seeking public input to determine the extent to which these issues exist in communities across Michigan. Responses from residents like yourself will be critical in assessing barriers to fair housing and the approaches the State may take to address them. This is an anonymous survey and all responses will be confidential. MSHDA will not look at individual responses but only analyze the results in aggregate.

This survey should take approximately 10 minutes to complete. Thank you in advance for your participation. Feel free to forward this survey on to stakeholders we may have missed.

Definitions:

Fair Housing- Equal and free access to housing choices regardless of race, color, religion, sex, national origin, familial status, and handicap/ disability. Title VIII of the Civil Rights Act of 1968 adds the additional protected classes of age and ancestry.

Impediments to Fair Housing Choice- Any actions, omissions or decisions which have the effect of restricting housing choices for the groups defined above, through sale or rental of housing, the financing of housing or the provision of brokerage services.

1. In general, how would you rate the neighborhood that you live in? Please use the 10-point rating scale below, where 1 represents the “worst neighborhood” and 10 represents the “best neighborhood.”
2. Do you own or rent your home?
 - a. Own, with mortgage
 - b. Own, no mortgage
 - c. Rent from a private landlord (no assistance)
 - d. Rent with public assistance (Section 8 or other) from a private landlord
 - e. Rent in a public housing complex
 - f. Rent in an income-qualified complex (low income housing)
 - g. None of the above, living with others
 - h. None of the above, living in shelter or homeless
3. Have you experienced any of the following in the past two years in your household? Please Check all that apply.
 - a. Difficulty paying rent/mortgage
 - b. Difficulty paying utilities
 - c. Inability to make needed repairs/improvements to your home
 - d. Overcrowding
 - e. Other issues with your home (please specify): _____
4. Have you experienced any of the following in the past two years in your neighborhood? Please check all that apply.
 - a. Dissatisfaction with local services (Trash pick-up, street maintenance)
 - b. Vacant structures or properties or uninhabitable homes
 - c. Lack of repair or maintenance of neighboring homes
 - d. Increase in crime
 - e. Trashed, unlicensed vehicles or household furniture
 - f. Other issues with your neighborhood (please specify): _____
5. What is your familiarity with Fair Housing Laws?
 - a. Not Familiar
 - b. Somewhat Familiar
 - c. Familiar
 - d. Very Familiar
 - e. Unsure
6. Are you aware of your rights under the Federal Fair Housing Act and Michigan Elliott-Larsen Civil Rights Act?
 - a. Yes
 - b. No
7. Which, if any, of the following barriers to housing choice have you experienced or observed in your community? Please check all that apply.
 - a. Lack of accessibility for people with disabilities
 - b. Age-restrictions on available housing
 - c. Poor physical conditions of available housing units
 - d. High cost of housing

- e. Distance of available housing to employment
 - f. Diversity of housing types
 - g. Lack of transportation/ access to public transportation
 - h. Utility costs
 - i. None
 - j. Other (please specify): _____
8. Have you witnessed housing discrimination in your community?
(Housing discrimination is discrimination in which an individual or family is treated unequally when trying to buy, rent, lease, sell or finance a home based on certain characteristics, such as race, color, religion, sex, national origin, familial status, handicap/disability, age, and ancestry.)
- a. Yes
 - b. No

9. If you answered yes to question 8, what is the severity of discrimination you have witnessed in the following areas:

Options: Not Very Severe; Somewhat Severe; Very Severe, Unsure/Don't Know; I have not witnessed discrimination in this area)

- a. Race
- b. Color
- c. Religion
- d. Sex
- e. National Origin
- f. Familial Status
- g. Handicap/disability
- h. Age
- i. Ancestry
- j. Other (please specify)

[page break]

10. Have you experienced housing discrimination while living in Michigan?
- a. Yes
 - b. No
 - c. I'm not sure.

11. If you answered yes to question 10, on what basis do you believe that you were discriminated against?

Please answer this question based on one individual act of discrimination that you have experienced. You may check all bases against which you believe you were discriminated. If you have other incidences of discrimination, please describe them in the comments section at the end of the survey.

- a. Source of Income
- b. Race
- c. Color
- d. Religion

- e. Sex
- f. National Origin
- g. Familial Status
- h. Handicap/disability
- i. Age
- j. Ancestry
- k. Other (please specify)

12. If you answered yes to question 10, who discriminated against you?

- a. Landlord/property manager
- b. Mortgage lender
- c. Real estate agent
- d. Other (please specify)

13. If you answered yes to question 10, where did the act of discrimination occur?

- a. Apartment complex
- b. Single family neighborhood
- c. Condo development
- d. Other (please specify)

14. If you answered yes to question 10, did you report the incident to (check all that apply):

- a. A government agency
- b. A fair housing group
- c. I did not report the incident.
- d. To someone else (please specify)

15. If you did not report the incident, why not? Check all that apply.

- a. I did not know where to report it.
- b. I was afraid of retaliation.
- c. I was not sure of my rights.
- d. I did not think it would make a difference.
- e. Other (please specify)

[page break]

16. Are you aware of opportunities in your community for training, workshops, or information about housing discrimination?

- a. Yes
- b. No
- c. Unsure

17. Have you ever participated in any sort of fair housing education opportunity?

- a. Yes
- b. No
- c. Unsure

If **Yes**, please describe your experience: _____

[page break]

18. How long have you lived in Michigan?
- Less than one year
 - 1 – 4 years
 - 5 – 9 years
 - 10 or more years
19. What is your sex?
- Male
 - Female
20. What is your age?
- 18-24
 - 25-34
 - 35-44
 - 45-64
 - 65 or older
21. What is your race?
- White
 - African American
 - American Indian/Alaskan Native
 - Asian
 - Native Hawaiian or Other Pacific Islander
 - Other (please specify)
22. Are you of Hispanic or Latino origin?
- Yes
 - No
23. What is the primary language spoken in your home?
- English (American)
 - Spanish
 - Other (please specify)
24. If the primary language spoken in your home is NOT English, do you believe your local government provides sufficient information on fair housing laws and resources in your native language to allow you to understand your rights?
- Yes
 - No
 - Unsure
25. Are you disabled?
- Yes
 - No
26. How many people live in your household?
- 1
 - 2
 - 3

- 4
- 5
- 6
- 7
- 8
- 9
- 10
- More than 10

27. Is your household a female-headed household?

- a. Yes
- b. No

28. What is your annual household income (before taxes)?

- a. Less than \$18,700
- b. \$18,701 – 31,200
- c. \$31,201 – 49,900
- d. \$49,901 - \$62,400
- e. \$62,401 or above

29. How much of your household income do you spend on housing (including rent/mortgage, insurance, and taxes)?

- a. Less than 24%
- b. 25 – 30%
- c. 31 – 40%
- d. 41 – 50%
- e. 51 - 75%
- f. More than 75%

[page break]

30. Please share any additional comments regarding fair housing.

Thank you for your participation!

[This section has one draft but will actually be two separate questionnaires in the survey: one for jurisdictions receiving funds from MSHDA and another for stakeholder/advocacy groups. The two surveys will be almost identical. Differences are noted in yellow highlight.]

Jurisdiction/Stakeholder Survey for Michigan Analysis of Impediments to Fair Housing

Thank you for your interest in completing this survey on jurisdiction/stakeholder perspectives on fair housing.

MSHDA, as administrator of federal funds for the U.S. Department of Housing and Urban Development (HUD) is required to certify that its grantees will affirmatively further fair housing. Your response to this survey is **critical** in MSHDA's continued receipt of HUD funds that directly benefit your community. Additionally, your input will allow MSHDA to gain a more qualitative analysis of the knowledge, experiences, opinions and feelings of stakeholders and other interested parties regarding fair housing in Michigan.

Please ensure that your responses to the survey questions are reflective of the cumulative experiences of your organization. If you would like to share your personal experiences, then you are invited to participate in the Community Resident Survey. You may access the Resident Survey by returning to the first survey page and clicking the resident option.

All responses to the survey will be confidential. MSHDA will not look at individual responses but only analyze the results in aggregate.

The survey will take approximately 10 minutes to complete. Thank you in advance for your participation. Feel free to forward this survey on to stakeholders we may have missed.

Definitions:

Fair Housing- Equal and free access to housing choices regardless of race, color, religion, sex, national origin, familial status, and handicap/ disability. Title VIII of the Civil Rights Act of 1968 adds the additional protected classes of age and ancestry.

Impediments to Fair Housing Choice- Any actions, omissions or decisions which have the effect of restricting housing choices for the groups defined above, through sale or rental of housing, the financing of housing or the provision of brokerage services.

1. Name of Organization: _____

2. What is your Organization's primary role from the list below?
 - a. Local Government
 - b. Nonprofit
 - c. Educational
 - d. Advocacy Group
 - e. Consulting Firm
 - f. Self-Employed
 - g. Property Management
 - h. Banking/Finance
 - i. Construction/Development
 - j. Law/Legal Services
 - k. Real Estate
 - l. Other, please specify: _____

3. What is your organization's familiarity with Fair Housing Laws?
- Not Familiar
 - Somewhat Familiar
 - Familiar
 - Very Familiar
 - Other, please specify: _____

[page break]

4. Please evaluate the severity of discrimination in the following categories for persons seeking housing in your service area.

(Options for each below: No Discrimination; Not Very Severe; Somewhat Severe; Very Severe, Unsure/Don't Know; Not Applicable)

- Source of Income
- Race
- Color
- Religion
- Sex
- National Origin
- Familial Status
- Handicap/disability- (mental and physical)
- Age
- Ancestry
- Marital Status
- Gender, Gender Identity, and Gender Expression
- Sexual Orientation
- Other (please specify)

[page break]

5. Please evaluate the severity of the following impediments related to services and opportunities in your service area.

(Options for each below: Not an Impediment; Not Very Severe; Somewhat Severe; Very Severe; Unsure/ Don't Know; Not Applicable)

- Inadequate information regarding fair housing rights
- Insufficient information and marketing about housing availability
- Inadequate access to technology (e.g. telephone, internet, etc.)
- Inadequate access to transportation
- Inadequate access to public and social services
- Inadequate access to employment opportunities
- Other (please specify impediment and severity)

6. Please evaluate the severity of economic impediments to fair housing in your service area.

OPTIONS for each below: Not an Impediment; Not Very Severe; Somewhat Severe; Very Severe; Unsure/ Don't Know; Not Applicable

- a. Inability to secure enough public subsidies to develop affordable housing
 - b. Activities causing housing displacement (e.g. revitalization of neighborhoods, property tax increases, demolition, etc.)
 - c. Lack of developers with capacity to develop affordable housing
 - d. High costs of construction
 - e. High costs of land suitable for affordable housing development
 - f. Unethical real estate processes (e.g. steering, blockbusting, etc.)
 - g. Shortage of mortgage financing available to low-income households (lack of subsidies/financial assistance such as down payments and closing costs)
 - h. Unfair lending practices (e.g. excessive promotion of subprime mortgages or predatory lending)
 - i. Other (please specify impediment and severity)
7. Please evaluate the severity of the following impediments related to government actions, involvement, and obligations if they exist in your service area.

OPTIONS for each below: Not an Impediment; Not Very Severe; Somewhat Severe; Very Severe; Unsure/ Don't Know; Not Applicable

- a. The lack of comprehensive fair housing planning
- b. Ignorance of the law/obligations by local officials
- c. Lack of knowledgeable assistance on fair housing issues at the local level
- d. Lack of a designated officer to handle fair housing requests
- e. Inadequate enforcement of fair housing laws
- f. Inadequate representation of diverse interests (e.g. racial, ethnic, religious, and disabled segments on housing advisory boards, commissions, and committees)
- g. Local land use controls and zoning prohibiting higher density, multifamily housing
- h. Development standards, building codes, or permits inhibit the development of affordable housing
- i. Environmental contamination or health hazards (e.g. lead-based paint or mold) limits the availability of land or readily-usable existing housing stock
- j. Other (please specify impediment and severity)

[page break]

8. Please evaluate the frequency of current government practices that are implemented by your jurisdiction to address fair housing impediments.

OPTIONS for each below: Never, Annually, Biannually, Quarterly, Monthly, Weekly

[For Stakeholder survey, use the following question: Please evaluate the effectiveness of the following government actions if used by the jurisdiction in your service area. If not used or you are unsure, mark your answer accordingly. OPTIONS: Very Effective, Somewhat Effective, Not at all effective, Unsure/Don't know, Not Applicable.]

- a. Coordinating between local and regional housing agencies (e.g. housing authorities, local housing departments, and nonprofit organizations, etc.)
- b. Coordinating between enforcement agencies (e.g. building inspectors, law enforcement, legal departments, etc.)
- c. Partnering with nonprofit organizations assisting protected groups (e.g. racial minorities, disabled, elderly, etc.) for outreach

- d. Developing housing for large households (e.g. various unit sizes)
 - e. Increasing housing choice for Section 8/Housing Choice Voucher Program participants (e.g. quality, setting, participation, etc.)
 - f. Allocating local funds for affordable housing development (e.g. state, federal, or private sector)
 - g. Siting affordable housing near access to transportation
 - h. Siting affordable housing new access to public and social services
 - i. Siting affordable housing near access to employment opportunities
 - j. Other (please specify practice and frequency/ effectiveness)
9. Please evaluate the effectiveness of the following marketing practices in addressing fair housing concerns in your service area. If not used or you are unsure, mark your answer accordingly.

OPTIONS for each below: Very Effective; Somewhat Effective; Not at all effective; Unsure/Don't know; Not Applicable/Not Used.

- a. Market available housing throughout the community via ethnic newspapers
 - b. Market available housing throughout the community via internet in multiple languages
 - c. Market available housing throughout the community at in-person meetings at convenient, accessible locations and times.
 - d. Market available housing using techniques to assist the disabled (e.g. visually impaired, hearing-impaired, physically disabled, etc.)
 - e. Market available housing and fair housing resources for populations with limited english proficiency
 - f. Other (please specify practice and frequency)
10. Please evaluate the frequency of current educational outreach practices that are implemented by your jurisdiction to address fair housing impediments.

OPTIONS for each below: Very Effective; Somewhat Effective; Not at all effective; Unsure/Don't know; Not Applicable.

[For Stakeholder survey, use the following question: Please evaluate the effectiveness of the following educational outreach practices if used in by the jurisdictions in your service area. If not used or you are unsure, mark your answer accordingly.]

- a. Education, training, and counseling for tenants and prospective homebuyers
- b. Education and training for landlords (e.g. on fair housing marketing/advertising, tenant selection, reasonable accommodation, etc.)
- c. Education and technical training for real estate and mortgage industry professionals
- d. Education and training for the public/community at large
- e. Other (please specify practice and frequency)

[page break]

11. Has your organization received any complaints of housing discrimination?
- a. Yes
 - b. No

12. If you have answered yes to question 11, check the basis on which complaints were made.

Check all that apply.

- a. Source of Income
- b. Race
- c. Color
- d. Religion
- e. Sex
- f. National Origin
- g. Familial Status
- h. Handicap/disability- (mental and physical) including HIV and AIDS
- i. Age
- j. Ancestry
- k. Marital Status
- l. Gender, Gender Identity, and Gender Expression
- m. Sexual Orientation
- n. Other (please specify)

13. Are you aware of any questionable practices or barriers to fair housing choice in the following areas? [Yes, No, I don't know] Provide comments in the comment box.

FOR THE SURVEY FOR SERVICE PROVIDERS AND ADVOCACY GROUPS INCLUDE THE HIGHLIGHTED ITEMS

- a. Rental housing market
- b. Real estate market
- c. Mortgage and home lending industry
- d. Access of minority populations to serving as representatives on state or local boards, commissions, etc.
- e. Any other housing services
- f. Land use policies
- g. Zoning laws

14. Please share any additional comments regarding fair housing.

Thank you for your participation!

Introducción

La Autoridad de Desarrollo de Vivienda del Estado de Michigan (MSHDA) solicita su participación en una breve encuesta diseñado para identificar impedimentos para equidad de vivienda en el Estado de Michigan.

MSHDA ha preparado tres encuestas separadas para recoger perspectivas de jurisdicciones (1) que reciben financiamiento de MSHDA; (2) organizaciones no gubernamentales familiarizadas con las leyes de vivienda justa, condiciones de vivienda y programas comunitarios en Michigan; y (3) residentes del estado. Al hacer una selección de abajo, se le dirigirá a la encuesta para recoger cada una de estas perspectivas.

Nota: Si usted está respondiendo en nombre de una jurisdicción o una organización no gubernamental, entonces por favor responda con la perspectiva de su organización como un todo. Si desea proporcionar sus perspectivas personales y es un residente de Michigan, entonces usted puede completar la encuesta residente también.

1. Por favor seleccione una opción de abajo que mejor lo describe. Su respuesta determinará qué preguntas de la encuesta podrás ver.
 - a. Trabajo para una jurisdicción (es decir, gobierno local) que recibe financiamiento de MSHDA.
 - b. Trabajo para una organización no gubernamental familiarizada con las leyes de vivienda justa, condiciones de vivienda y programas comunitarios en Michigan.
 - c. Soy un residente de Michigan. Responderé a esta encuesta con mis opiniones personales y no de cualquier organización.

2. Seleccione el condado en que usted reside
 - a. [desplegable lista de todos los condados de Michigan]
 - b. Otro (por favor especifique)

Encuesta Residente de Michigan Análisis de Impedimentos para Equidad de Vivienda

Gracias por su interés en completar esta encuesta sobre perspectivas residente en la vivienda.

MSHDA está buscando activamente la opinión pública para determinar la medida en que estos problemas existen en las comunidades a través de Michigan. Las respuestas de los residentes como a ti mismo será críticas en la evaluación de las barreras a la equidad de vivienda y los enfoques del estado pueden tomar para hacerles frente. Esta es una encuesta anónima y todas las respuestas serán confidenciales. MSHDA no mire las respuestas individuales, pero sólo analizar los resultados en conjunto.

Esta encuesta debe tomar aproximadamente 10 minutos para completar. Gracias de antemano por su participación. Siente libre de enviar esta encuesta a los partes interesados que nosotros posible echamos de menos.

Definiciones:

Equidad de Vivienda - Igualdad y libre acceso a opciones de vivienda sin importar raza, color, religión, sexo, Origen Nacional, Estado Familiar y desventaja/discapacidad. Título VIII de la Ley de Derechos Civiles de 1968 agrega las clases protegidas adicionales de edad y ascendencia.

Impedimentos para FERIA Elección de Vivienda - Cualquier actos, omisiones o decisiones que tienen el efecto de restringir opciones de vivienda para los grupos definidos anteriormente, a través de la venta o alquiler de la vivienda, la financiación de la vivienda o la prestación de servicios de corretaje.

1. ¿En general, cómo calificaría el barrio que viven en? Utilice la escala de calificación de 10 puntos más abajo, donde 1 representa el "peor barrio" y 10 representa el "barrio mejor".
2. ¿Es dueño o alquila su casa?
 - a. Propio, con hipoteca
 - b. Propio, sin hipoteca
 - c. Alquiler de un propietario privado (sin asistencia)
 - d. Alquiler con asistencia de público (Sección 8 u otro) de un propietario privado
 - e. Alquiler en un complejo de viviendas públicas
 - f. Alquiler en un complejo de ingreso-calificado (vivienda de bajos ingresos)
 - g. Ninguna de las anteriores, viven con otros
 - h. Ninguna de las anteriores, viven en refugios o sin hogar
3. ¿Ha experimentado alguno de los siguientes en los últimos dos años en su hogar? Por favor marque todas las que aplican.
 - a. Dificultad pagar alquiler/hipoteca
 - b. Dificultad pagar utilidades
 - c. Incapacidad para hacer reparaciones/mejoras necesarias para su hogar
 - d. Hacinamiento
 - e. Otros problemas con su casa (por favor especifique): ____
4. ¿Ha experimentado alguno de los siguientes en los últimos dos años en su barrio? Por favor marque todas las que aplican.
 - a. Insatisfacción con los servicios locales (recogida de basura, mantenimiento de calle)
 - b. Vacante estructuras o propiedades o viviendas inhabitables
 - c. Falta de reparación o mantenimiento de casas vecinas
 - d. Aumento de la delincuencia
 - e. Destrozados, vehículos sin licencia o muebles del hogar
 - f. Otros temas con tu barrio (por favor especifique): ____
5. ¿Cuál es su familiaridad con las Leyes de Vivienda Justa?
 - a. No Familiar
 - b. Algo Familiar
 - c. Familiar
 - d. Muy Familiar
 - e. Inseguro
6. ¿Es consciente de sus derechos bajo la Ley Federal de Vivienda Equitativa y Ley de Derechos Civiles de Michigan Elliott-Larsen?
 - a. Sí
 - b. No
7. ¿Que, si los hubiere, de los siguientes barreras para la elección de la vivienda han experimentado u observado en tu comunidad? Por favor marque todas las que aplican.
 - a. Falta de accesibilidad para personas con discapacidad
 - b. Restricciones de edad en viviendas disponibles
 - c. Malas condiciones físicas de unidades de vivienda disponibles

- d. Alto costo de vivienda
 - e. Distancia de viviendas disponibles para el empleo
 - f. Diversidad de tipos de vivienda
 - g. Falta de transporte/acceso al transporte público
 - h. Costos de utilidad
 - i. Ninguno
 - j. Otro (por favor especifique): ____
8. ¿Han visto discriminación en la vivienda en tu comunidad?
(Discriminación en la vivienda es la discriminación en la que un individuo o familia es tratada desigual cuando se trata de comprar, alquilar, arrendar, vender o financiar un hogar basado en ciertas características, tales como raza, color, religión, sexo, Origen Nacional, condición familiar, desventaja/discapacidad, edad y ascendencia.)
- a. Sí
 - b. No

9. Si usted contestó sí a la pregunta 8, ¿cuál es la gravedad de la discriminación que ha sido testigos en las siguientes áreas?:

Opciones: No es muy grave; Algo grave; Muy grave, no está seguro/no sé; Que no he visto discriminación en este ámbito

- a. Fuente de Ingresos
- b. Raza
- c. Color
- d. Religión
- e. Sexo
- f. Origen Nacional
- g. Estado Familiar
- h. Desventaja/discapacidad – ((física y mental)
- i. Edad
- j. Ascendencia
- k. Estado Civil
- l. Género, Identidad de Género y Expresión Género
- m. Orientación Sexual
- n. Otro (por favor especifique)

[salto de página]

10. ¿Ha experimentado discriminación en la vivienda mientras vivía en Michigan?
- a. Sí
 - b. No
 - c. No estoy seguro.

11. Si usted contestó si a la pregunta 10, ¿en qué base cree usted que le han discriminado?

Por favor responder a esta pregunta basada en un acto de discriminación que han sufrido. Puede consultar todas las bases contra la cual usted cree que fueron discriminadas. Si tienes otras

incidencias de la discriminación, por favor describir en la sección de comentarios al final de la encuesta.

- a. Fuente de Ingresos
 - b. Raza
 - c. Color
 - d. Religión
 - e. Sexo
 - f. Origen Nacional
 - g. Estado Familiar
 - h. Desventaja/discapacidad – (física y mental)
 - i. Edad
 - j. Ascendencia
 - k. Estado Civil
 - l. Género, Identidad de Género y Expresión Género
 - m. Orientación Sexual
 - n. Otro (por favor especifique)
12. Si usted contestó sí a la pregunta 10, ¿quién lo discriminó?
- a. Propietario/administrador de la propiedad
 - b. Prestamista hipotecario
 - c. Agente de bienes raíces
 - d. Otro (por favor especifique)
13. Si usted contestó sí a la pregunta 10, ¿donde ocurrió el acto de discriminación?
- a. Complejo de apartamentos
 - b. Sola familia barrio
 - c. Desarrollo condominio
 - d. Otro (por favor especifique)
14. Si usted contestó sí a la pregunta 10, ¿informaron el incidente a? (marque todas las que aplican):
- a. Una agencia gubernamental
 - b. Un grupo de vivienda justa
 - c. No reporto el incidente.
 - d. A otra persona (por favor especifique)
15. Si usted no reportó el incidente, ¿por qué no? (marque todas las que aplican)
- a. No sabía dónde informar de ello.
 - b. Tenía miedo de represalias.
 - c. No estaba seguro de mis derechos.
 - d. No pensé que haría una diferencia.
 - e. Otro (por favor especifique)
- [salto de página]
16. ¿Es consciente de las oportunidades en su comunidad para formación, talleres, o información sobre discriminación en la vivienda?
- a. Sí

- b. No
 - c. Inseguro
17. ¿Alguna vez ha participado en cualquier tipo de vivienda justa educación oportunidad?
- a. Sí
 - b. No
 - c. Inseguro

En caso **Afirmativo**, por favor describa su experiencia: ____
[salto de página]

18. ¿Cuánto tiempo tiene usted viviendo en Michigan?
- a. Menos de un año
 - b. 1 – 4 años
 - c. 5 – 9 años
 - d. 10 o más años

19. ¿Cuál es su sexo?
- a. Masculino
 - b. Femenino

20. ¿Cuál es su edad?
- a. 18-24
 - b. 25-34
 - c. 35-44
 - d. 45-64
 - e. 65 años o más

21. ¿Cuál es su raza?
- a. Blanco
 - b. Africano Americano
 - c. Indio Americano/Nativo de Alaska
 - d. Asiático
 - e. Nativo Hawaiano u Otra Isla del Pacifico
 - f. Otro (por favor especifique)

22. ¿Es usted de origen Hispano o Latino?
- a. Sí
 - b. No

23. ¿Cuál es el idioma principal hablado en su hogar?
- a. Inglés (Americano)
 - b. Español
 - c. Otro (por favor especifique)

24. ¿Si el idioma principal hablado en su casa NO ES Inglés, cree que el gobierno local proporciona suficiente información sobre las leyes de vivienda justa y los recursos en su lengua materna para que pueda entender sus derechos?
- a. Sí
 - b. No

c. Inseguro

25. ¿Está incapacitado?

- a. Sí
- b. No

26. ¿Cuántas personas viven en su hogar?

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- Más de 10

27. ¿Es su hogar un hogar encabezadas por una mujer?

- a. Sí
- b. No

28. ¿Cuál es su ingreso familiar anual (antes de impuestos)?

- a. Menos de \$18,700
- b. \$18,701-31,200
- c. \$31,201 – 49,900
- d. \$49,901-\$62,400
- e. \$62,401 o superior

29. ¿Cuánto de su ingreso familiar gastan en vivienda (alquiler o hipoteca, seguro e impuestos)?

- a. Menos del 24%
- b. 25 – 30%
- c. 31 – 40%
- d. 41 – 50%
- e. 51-75%
- f. Más del 75%

[salto de página]

30. Por favor comparta cualquier comentario adicional sobre vivienda justa.

¡Gracias por su participación!

Appendix D: List of Stakeholder Interviews

ORGANIZATION	CONTACT
Audu Real Estate	Lola Audu
Michigan Mortgage Lenders Association (MMLA)	Dan Grzywacz
Habitat for Humanity of Michigan	Nicole Shafer
Michigan Association of Counties	Tim McGuire
Michigan Townships Association	Larry Merrill