

City of Covington

Analysis of Impediments to Fair Housing Choice

Consolidated Plan
2005-2009

February 14, 2007

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Introduction and Executive Summary

The U.S. Department of Housing and Urban Development (HUD) requires each Entitlement Jurisdiction to certify that it is in compliance with the Consolidated Plan Final Rule, published in the Federal Register (24 CFR 91.225). The Consolidated Plan is a document prepared by the city of Covington's Housing Development Department and serves as . . .

- A housing and community development planning document;
- A strategy to be followed in carrying out HUD programs;
- An action plan that provides a basis for assessing performance; and
- An application for the city in regards to the following HUD grant programs:
 - The Community Development Block Grant (CDBG)
 - The HOME Investment Partnerships (HOME)

The Fair Housing Act of 1968 required that all HUD programs be administered in a manner that will “*affirmatively further fair housing.*” Although the Analysis of Impediments to Fair Housing Choice (AI) itself is not directly approved or denied, it is a HUD-mandated document. As such, the Consolidated Plan requires each Entitlement Jurisdiction to show its commitment to affirmatively furthering fair housing choice by . . .

- Conducting an Analysis of Impediments to Fair Housing Choice;
- Identifying policies, programs and practices that address the identified impediments;
- Taking appropriate actions to overcome the effects of impediments identified through that analysis; and
- Maintaining records that reflect the analysis and actions.

According to HUD, impediments to Fair Housing choice are . . .

- Any actions, omissions, or decisions *taken because* of race, color, religion, sex, disability, familial status or national origin which restrict housing choices or the availability of housing choices.
- Any actions, omissions, or decisions which have the affect of restricting housing choices or the availability of housing choices *on the basis* of race, color, religion, sex, disability, familial status or national origin.

Subsequently, the Analysis of Impediments document is the HUD established measure of fair housing for CDBG (Community Development Block Grant) grantees and is intended to serve as . . .

- A comprehensive review of the city's laws, regulations, administrative policies, procedures and practices with regard to Fair Housing in Covington;
- An assessment of how those laws, regulations, policies, and procedures affect the location, availability, and accessibility of housing; and
- An assessment of public and private sector conditions affecting Fair Housing choice.

Methodology

Staff from the Housing Development Department of Covington conducted this Analysis of Impediments (AI). The methodology used for completion of the AI consisted of:

- Extensive research using various resources including the internet, newspaper articles, press releases, promotional material, City reports, Commission minutes and other documents
- 1990 and 2000 U.S. Census
- Zoning and Land Use
- Building Code requirements
- Solicitation of community input regarding the status of Fair Housing Choice within the City of Covington
- Consolidated Plan of the City of Covington Housing Development Department 2004 – 2009
- Review of HUD resources related to Fair Housing issues
- Administration policies concerning community development and housing activities
- Consultation with the City of Covington’s Human Rights Commission

Covington Housing Development Department staff then prepared a draft report and submitted it for public comment. It was also submitted to the Citizen Participation Committee and the Human Rights Commission. The Public Notice will be attached to the Final Draft. After receiving public input, staff will complete the final Analysis of Impediments and revise the list of actions, as needed.

Fair Housing in Covington

Results of Fair Housing Survey

The Fair Housing Survey and the chart of numeric results can be found in the appendices. The Fair Housing Survey was sent to 400 residents of Covington. Of the surveys sent out, only 81 were returned to the Housing Development Department. The survey revealed that 32% of the respondents feel that housing discrimination occurs in their neighborhoods. While a majority of citizens do not feel there is discrimination according to the small sample represented on the survey, 32% is a fairly large number and indicates that something is going on even if there is no evidence at this time. When asked if the respondent had ever personally experienced discrimination in housing, 17 residents, or 21%, reported they had been discriminated against. Sixteen of those experiencing discrimination believed it was the landlord or property manager that discriminated against them. Only one person said the mortgage lender, one person said the City, and two people said that a real estate agent had discriminated against them. The responses indicated that ten residents had experienced discrimination in a single family neighborhood and eight residents said it happened in an apartment complex. The residents were asked what basis they believed they were discriminated against. They were allowed to provide multiple answers. The principal reason for discrimination was on the basis of race, followed closely by familial status and then age. Other causes of discrimination were color, disability, the fact that they received Section 8, a resident's sex, marriage or parental status, and sexual orientation.

Only one person out of the eighty one people that returned the survey felt that he or she had been denied "reasonable accommodation" for his or her disability. Twenty people responded that they had been discriminated against and had not reported it. Of those people, 40% didn't believe it made any difference, 35% said they didn't know where to report it, 15% feared retaliation, and 15% said it was too much trouble. The lack of education on Fair Housing Laws and lack of knowledge of who, how, why and where to complain are issues that must be addressed.

Results of Landlord Fair Housing Survey

The Landlord Fair Housing Survey and the chart of numeric results can be found in the appendices. This survey was mailed to all Section 8 landlords, 298 in all. Twenty-seven surveys were received back, giving a very small sample. The questions asked about matters such as legal representation, deposits, references and knowledge of fair housing laws. Twelve of the landlords responded that they have legal representation to handle tenant issues. The answers indicated that the landlords lacked knowledge of protected classes and Fair Housing laws.

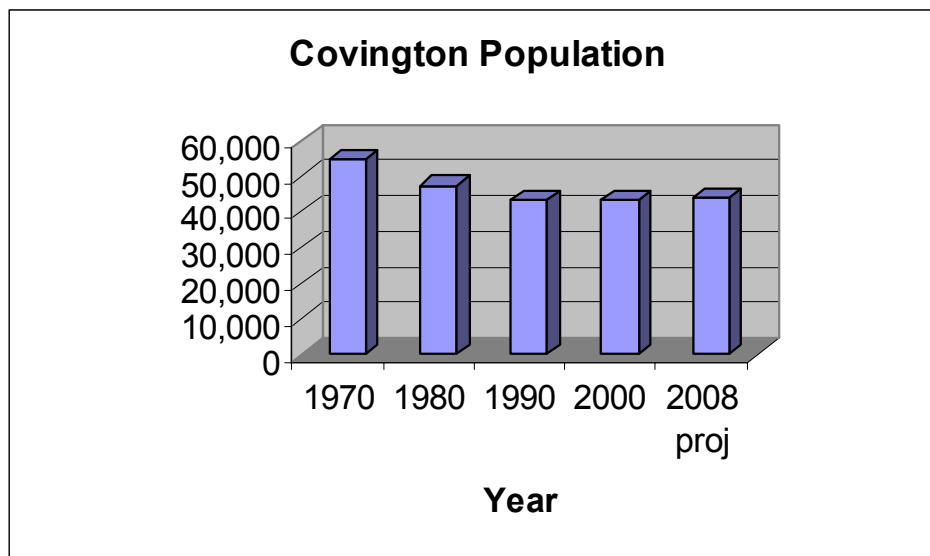
Jurisdictional Background Data

The following information regarding population, employment, income and housing needs will provide the context for making a determination of any impediments to fair housing that exist.

Population

The population in the City of Covington decreased greatly from 1970 to 1990. In 1970 the population was 54,771. In 1980 it decreased to 47,469, a decrease of 13.30 percent. In 1990 the decrease was to 43,572, or by 8.20 percent. From 1990 to 2000 the population stabilized, only changing from 43,572 to 43,370, or a decrease of only 0.50 percent. Projections for the year 2008 show a very slight increase (1.76 percent) in the population, up to 44,134.

When considering the changes in population on housing needs, it is helpful to understand how the population has changed within different parts of the City. The decline since 1970 has mainly occurred in the north end of the City. The recent stabilization of the population has been a result of decline in the north end of the City along with growth in the southern end.



Housing Profile

In 1990 there were 17,319 households in Covington. Data from the 2000 census show that the number of households increased by 938 to 18,257. This is a 5.4 percent rate of growth, exceeding the population growth by more than five percentage points. These data show an interesting trend since the population has remained stable while the number of households has grown between 1990 and 2000, reversing a steady decline between 1970 and 1990. The growth of the number of households outpacing

population growth reflects the growing number of single-person households in the City. In fact, average household size in 1990 was 2.43 and fell to 2.31 in 2000.

The number of married couple families continued to decline from 1990 to 2000. In 2000, there were 6,257 married-couple families, which comprised 34.3 percent of Covington's households. This was down from 6.952 or 40.1 percent of households in 1990. In the 1990s there was growth among households consisting of single persons (from 34.0 percent to 36.5 percent of all households) and an increase in multi-person non-family households (from 5.2 percent to 8.1 percent). While there was an increase in male-headed families (from 3.9 percent to 4.7 percent), there was a slight decline among single female-headed families (from 16.7 percent to 16.5 percent).

According to the 2000 Census, the total number of housing units in Covington is 20,419. This was an increase of 5% from 1990. However, from 1990 to 2000, Kenton County's total number of housing units increased 12%. In Covington, 71.9% of the owner-occupied homes are valued from \$35,000 to \$99,999. These are very affordable to the first-time homebuyer. Only 22.1% of Covington's housing stock is valued above \$100,000. Kenton County has 53.6% of its housing stock valued over \$100,000. The Median Housing value in Covington is \$74,000 and in the entire state of Kentucky is \$80,000.

Income Data

Housing costs in general are a primary determinant of the need for affordable housing assistance.

The median household income for Covington in 1999 was \$30,735, which is below the national average of \$41,994. With this amount of income, obtaining affordable housing becomes problematic. The majority of households (69.7 percent) have an income in the range of \$15,000 to \$75,000. Almost 50 percent (48 percent) of households in Covington are in the range of \$15,000 to \$50,000. Another telling statistic is that the median earnings for a full-time male, year-round worker is \$31,238. In contrast, the female full-time, year-round worker's income is \$24,487. This disparity between male and female income makes it extremely difficult for single women head of households to find affordable housing.

In 1999 15.5 percent of families in Covington lived in poverty. The percentage jumps to 30.3 percent when households with related children under 5 years of age are considered. When families with female-headed household, no husband present and children under age 5 years are considered, the percentage living in poverty increases to 59.5 percent.

Special Needs

There are 5,168 persons living in Covington that are 65 years and over. The number of the population 65 years and over living in households is 4,752, or 91.9%. That means 8.1% live in group quarters. In Kenton County, 94.8% of the population 65 years and over live in households and 5.2% live in group quarters.

Gender and Familial Status

The city's population is 43,370. According to the 2000 census, approximately 51 percent of the population is female and 49 percent male. There are 3,008 female head of household with no spouse families in Covington. Female-headed households with no children are estimated to be 1,118 of the total 8,132 non-family households.

	<u>1990</u>	<u>2000</u>
Total Households	17,319	18,257
Family Households	10,531	10,125
Married Couples	6,952	6,257
Male Head, no spouse	683	860
Female Head, no spouse	2,896	3,008
Non-Family Households	895	1,471
Male Head	550	871
Female Head	345	600
Family Type		
Total Families		10,125
Married-couple family		6,257
With children living at the same residence		2,935
Without children living at the same residence		3,322
Male head of household, no wife present:		860
With children living at the same residence		433
Without children living at the same residence		427
Female head of household, no husband present:		3,008
With children living at the same residence		1,890
Without children living at the same residence		1,118

Race, Ethnicity and Minority Concentration

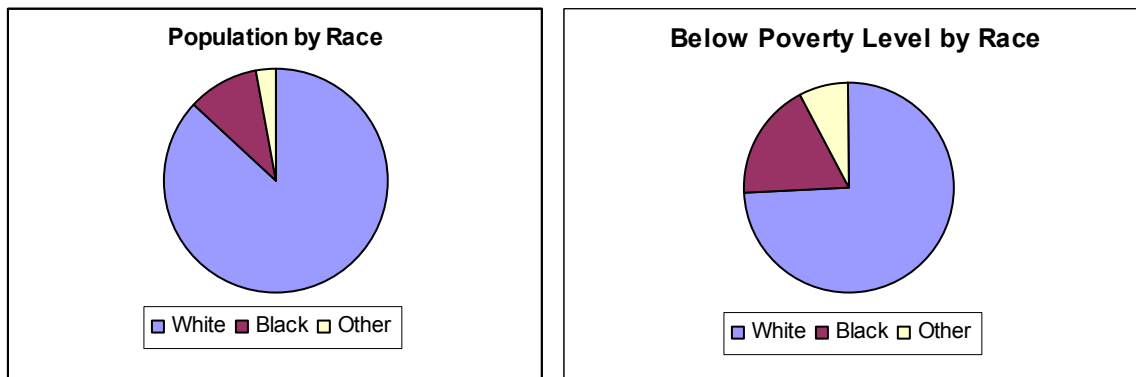
Covington has a relatively small minority population. The 2000 census stated that the city population was 43,370 with the minority population making up 13.0 percent of the total. The minority population is essentially black. They comprise 10.1 percent of the total population and 77.7 percent of the minority population. People of Hispanic or Latino background comprise 1.4 percent of the population.

Of the 18,257 households in the city, about 2,031 (or 11.1 percent) are minority households. These figures represent increases from 1990 when 1,309 of the 17,319 (7.6 percent) were minority households. There has been a shift in the composition of those households, however. About 85 percent of minority households were black in 2000 compared to 91.8 percent in 1990. A growing number and percentage of minority households have Hispanic origins – comprising about 161 households in 2000, up from 90 in 1990.

While there was small population growth in Covington, it did not happen evenly for the different ethnic groups. Although the white population is the city's largest, this group actually declined from 39,579 in 1990 to 37,752 in 2000, a 4.6 percent decrease. The number of blacks increased from 3,319 to 4,397, or an increase of 32.5 percent. Those of Hispanic origin grew from 282 to 600, an increase of 113 percent.

Information available on racial and ethnic status indicates that minorities in Covington, specifically low-income black households, have more housing needs than the population as a whole. The 2000 census showed that they are disproportionately poor. About 30.2 percent of black families in Covington live in poverty, compared to 15.5 percent of all families. The poverty rate was only 13.5 percent for whites. About 33.6 percent of Hispanic families also live in poverty. One interesting piece of data is that households where the head is white alone have a 1999 median income of \$32,126, while households where the head is black alone have a 1999 median income of only \$20,557. The most interesting information is that households where the head is Hispanic or Latino alone have a 1999 median income of \$38,750.

The charts below show the discrepancy between minorities as part of population and the number of minorities who live below the poverty level.



Language Spoken at Home

Here is a chart from Census 2000 Summary File 3 showing language spoken at home by ability to speak English for population 5 years and over (Hispanic or Latino).

Total:	649
Speak only English	272
Speak Spanish:	369
Speak English "very well"	167
Speak English "well"	92
Speak English "not well"	96
Speak English "not at all"	14
Speak other language	8

It shows that of the 649 Hispanics/Latinos, 41.9 percent speak only English, while 56.9 percent speak Spanish and 2.2 percent speak another language. Of those who speak Spanish, 70.2 percent speak English “very well” or “well,” while 29.8 percent speak English “not well” or “not at all.”

In the total population of Covington over 5 years of age, 96 percent of people speak only English. Of the rest, Spanish (1.9 percent), French (0.8 percent) and German (0.4 percent) are the languages most often spoken, while there is a smattering of other various languages.

Evaluation of Jurisdiction's Current Fair Housing Status

There have been no fair housing complaints or fair housing reviews in the last five years in the City of Covington where the Secretary of HUD has issued a charge or made a finding of discrimination. Also, no fair housing discrimination suits have been filed by the Department of Justice or by private plaintiffs.

From 2001 until 2004, nine housing complaints from Kenton County were filed with the Kentucky Commission on Human Rights. The Commission does not have records available of the exact location of the complaints. Four complaints were regarding familial status, two dealt with national origin, two were concerning disability, and only one dealt with the individual's race. However Covington is almost one third of the population of Kenton County, so it can be proportionately stated that probably three to four complaints originated in Covington.

According to Covington-based representatives of the Northern Kentucky office of the Kentucky Commission on Human Rights, very few significant complaints have been received.

Hate Crimes

Waiting on data

Identification of Impediments to Fair Housing Choice

Public Sector

Zoning

An area of minority concentration is defined as a census tract with a minority population above 10% of the city average. The highest percentage of minorities in Covington live in Census Tract 671, where the Black population makes up 57% of the total. This Eastside tract has historically been home of the black community in Covington. Jacob Price Homes was constructed decades ago in Census Tract 671. The other census tract with a minority concentration is Tract 651, which has a black population of 22% of the total. This tract is home to the City Heights and Latonia Terrace public housing complexes. The minority concentrations in these two tracts do not appear to have resulted from current zoning or other current policies or procedures.

The City promotes the placement of new and rehabilitated housing for lower-income households in a wide spectrum of neighborhoods. The zoning ordinance and other land use policies do not appear to significantly impact the provision of lower-income housing except in the geographically separated southernmost quadrant of the city. In that area, residential use is limited to single-family use except for small, scattered sites.

Other than in the southern section of the city, zoning subdivision, and other requirements do not restrict the level of density required for low- and moderate- income housing. Also, they do not restrict the location of facilities for persons with disabilities.

Covington has adopted a new Zoning Ordinance for the city.

There have been no court decisions or settlements relating to Covington's previous or current zoning and land use policies and regulations that have had an adverse effect on the provision of housing for lower-income households and persons with disabilities. Neither has the Housing Authority of Covington been subject to such court decisions or settlements relating to housing site selection.

Displacement Actions

Although some persons have been removed from publicly assisted housing, there is no evidence that displacement occurred for any reason except for the behavior of the tenant. However there is a major redevelopment program sponsored by the Housing Authority of Covington that will relocate numerous residents of the Jacob Price complex. That complex will be demolished in phases. The Housing Authority is making the move toward scattered site public housing. Jacob Price was in an area with an overwhelming minority concentration

Building Codes (Accessibility)

The City of Covington has adopted the Kentucky Building Code in its entirety. The Kentucky Building Code is based upon the BOCA National Building Code and incorporates its accessibility provision.

Private Sector

Buying or refinancing a home may be one of the most important and complex financial decisions an individual will ever make. It is important that a prospective homebuyer or homeowner be a smart consumer. If not properly educated, minorities, seniors and low-income persons can become victims of predatory lending practices.

To date, the City of Covington, in cooperation with Catholic Social Services of Northern Kentucky, has provided Yes You Can! classes in Spanish with translation materials. However the Brighton Center in Newport, Kentucky has been designated as one out of eight "counseling centers" by the Kentucky Housing Corporation. That means that they are the only regional counseling center for Yes You Can! classes. The City will continue to refer Covington residents to the Yes You Can! classes provided by the Brighton Center. It is anticipated that the Brighton Center will provide some classes in Spanish. The City also anticipates that the Catholic Social Services will resume some kind of homebuyer education and individual counseling.

Home Mortgage Disclosure Act

Home Mortgage Disclosure Act (HMDA) data provides a good picture of lending patterns in Bowling Green. HMDA was enacted by Congress in 1975 and is administered by the Federal Reserve Bank. HMDA data is the most comprehensive data source publicly available to discern and analyze lending trends. Certain lending institutions are required to report lending record data to the Federal Financial Institutions Examination Council (FFIEC). Institutions must report data based upon their size, the extent of the institutions business within a certain MSA, and whether the lending institution is in the business of residential mortgage lending. For example, certain institutions who do not sell loans to Fannie Mae or Freddie Mac or who do not make loans that are insured or guaranteed by a federal agency do not have to report the data.

While HMDA data provides a lot of information, it cannot tell the whole picture. For example, HMDA data does not depict the amount of subprime versus prime loans made in a given area. It also does not report the number of loans made by lenders who are not required to report the data. Finally, since the FFIEC compiles the data and disseminates the information in a series of reports, not all data is available in a detailed fashion.

The regulation provides public loan data that can be used to assist:

- In determining whether financial institutions are serving the housing needs of their communities

- Public officials in distributing public-sector investments so as to attract private investment to areas where it is needed
- In identifying possible discriminatory lending patterns

This data is only available for metropolitan areas, which for the City of Covington, means the Cincinnati Metropolitan Statistical Area (MSA).

Applications for Conventional Loans

	Applications Received	Loans Originated	Loans Denied	Other Actions
Blacks	4698	2598 (55%)	924 (20%)	1176 (25%)
Whites	44924	33154 (74%)	4811 (11%)	6959 (15%)
Hispanic	621	424 (68%)	88 (14%)	109 (18%)

Conventional Loans (Reason for Denial)

Blacks	Whites	Hispanic
Other (29%)	Credit History (29%)	Other (29%)
Credit History (26%)	Other (24%)	Credit History (26%)
Debt-to-Income (16%)	Debt-to-Income (16%)	Debt-to-Income (14%)
Collateral (10%)	Collateral (11%)	Collateral (12%)
Credit App. Incomplete (7%)	Credit App. Incomplete (9%)	Credit App. Incomplete (11%)

FHA, FSA/RHS and VA Applications

	Applications Received	Loans Originated	Loans Denied	Other Actions
Blacks	692	458 (66%)	130 (19%)	104 (15%)
Whites	5478	4098 (75%)	661 (12%)	719 (13%)
Hispanic	125	83 (66%)	18 (14%)	24 (19%)

FHA, FSA/RHS and VA (Reason for Denial)

Blacks	Whites	Hispanic
Credit History (44%)	Credit History (35%)	Credit History (35%)
Debt-to-Income (22%)	Debt-to-Income (35%)	Debt-to-Income (35%)
Credit App. Incomplete (11%)	Credit App. Incomplete (10%)	Other (9%)
Other (8%)	Other (9%)	Insufficient Cash (9%)
Collateral (4%)	Collateral (8%)	Collateral (4%)

The lending data shows that Blacks were denied conventional loans 9% more than Whites and Hispanics fared a little better at 3% more denials. Blacks were denied for FHA, FSA/RHS and VA loans 7% more than Whites and Hispanics were denied 2% more. There is a lack of evidence of discrimination in property appraisal, home improvement loans, or other policies, standards, and procedures used by lenders and appraisers in the Covington area. Although Blacks had only a slightly higher percentage of loans denied, that is still something the City should monitor.

Fair Housing Monitoring and Education

Until recently, the City of Covington's Housing Development Department, in cooperation with Catholic Social Services, had sponsored the "Yes You Can!" program, which provides nine hours of pre-purchase, credit and budget counseling to households interested in purchasing a home. Approximately 25 households attend this program on a monthly basis. Locally, for Spanish-speaking residents, Catholic Social Services has provided the "Yes You Can!" program in Spanish with translated materials. However the situation is in flux right now because they are supposed to turn over their entire Yes You Can! program to the Brighton Center in Newport, KY. The City will continue to refer residents to those classes. The City of Covington anticipates that Catholic Social Services will resume homebuyer education in the future. The Department also provides housing and financial counseling through its Family Self-Sufficiency Program.

Public Policy

Changes were made in 2003 to Covington's Human Rights Ordinance.

It protects people from discrimination in "housing, employment and public accommodations based on race, color, religion, national origin, sex, age, sexual orientation or gender identity, family status, marital and/or parental status, and place of birth as protective categories to make it a more universal ordinance.

Definitions of sexual orientation and gender identity were modeled after human rights ordinances in Lexington and Louisville. Under sexual orientation, those ordinances protect someone "based upon his or her imputed heterosexuality, homosexuality or bisexuality." Gender identity refers to protections for someone who has "a gender identity as a result of a sex change, surgery or manifesting, for reasons other than dress, an identity not traditionally associated with one's biological maleness or femaleness."

The "place of birth" protection covers groups such as people of Appalachian descent, who might be harassed or discriminated against.

The new ordinance included an enforcement proposal with "some teeth": The revised ordinance requires that complaints of human rights violations go directly to Covington's

Human Rights Commission, rather than to the city manager. Penalties were also added to give the commission enforcement powers.

Rental Programs

Patterns of Occupancy in Section 8 Housing

The Covington Housing Consortium administers the Section 8 program, which serves all of Kenton County, Kentucky. The program has 1,089 vouchers available for housing. The need for housing assistance in this area is very great. This is evidenced by the fact that when the waiting list was opened up to accept applications in March 2005, the Section 8 program received 1,043 applications in 90 days. The average length of time on the waiting list is around 18 months.

Minority Population in County: 9,249
Total Number of Tenants: 1,055
Number of Minority Tenants: 292
Percent of Minority Tenants: 28%
Percent of Minority Population in County: 6.1%

Patterns of Occupancy in Public/Assisted Housing

The Covington Housing Consortium administers public housing in the City of Covington. There are four properties with subsidized units. Golden Towers has 155 units; Jacob Price has 161 units; City Heights has 352; and Latonia Terrace 235 units. There are currently about 20 people on the waiting list and the average length of time on the waiting list is one month. As for demographics of the population in public housing, 80 percent are female, racially, approximately 45 percent are white and 55 percent are black. Around 15 percent of people are disabled. The following information is from their website, www.hacov.org:

From "About Us":

Number of Properties: 4
Number of Apartments: 919
Number of Full Time Employees: 52
Budget for Fiscal Year Ending 03/31/2006: \$6,700,000
First Year of Operation: 1937

Apartments operated by the Covington Housing Consortium are considered 'conventional public housing units'. Tenants are charged a monthly rent that does not exceed 30% of their adjusted income. In addition to tenant rents, the Housing Authority also receives an operating subsidy and a capital grant contribution for each of these units. Because their average tenant rent tends to be in the \$150 range, they are heavily dependant on the federal government to provide this type of gap financing. A small amount of income is also generated by leasing space atop their senior hi-rise building to cellular phone providers.

The Housing Authority of Covington began operations in 1937. Jacob Price Homes was the first community built, followed quickly by Latonia Terrace in the early 1940's, City Heights (formerly Ida Spence Homes) in the early 1950's, and the Golden Tower in the

late 1960's. A Consortium Agreement between the Housing Development Department of the City of Covington and the Housing Authority of Covington was approved by both Commissions in November, 2006 and Mr. Aaron Wolfe-Bertling was appointed Executive Director of the Housing Authority, effective December 1, 2006.

Function & Duties of the Consortium

Discussions regarding forming a "consortium" between the City of Covington and the Housing Authority of Covington began in early 2006. For some time there have been two "housing authorities" in Covington managing public housing. (The City which manages the Section 8 Program is considered to be a Housing Authority by HUD.) Federal law allows PHA's to form consortiums. Generally, a consortium consists of two or more PHA's that join together to perform planning, reporting and other administrative or management functions as specified in a consortium agreement. The Housing Authority as lead agency will be submitting a joint PHA plan and collecting the assistance funds from HUD and distributing it according to the Operating Plan and Agreement for the Consortium.

Valuable resources will be saved by eliminating duplication of plans, reports and administration. An immediate savings will be realized by having one executive director instead of two. The Consortium encompasses the Section 8 Program and the programs and activities of the Housing Authority of Covington.

From "Rent Basics":

The amount of rent a person pays in his/her apartment will almost certainly be less than what he/she is paying currently. That's because the rent payments are based on the amount of income in the individual's household. In many cases they will ignore certain types of income and apply generous deductions to help reduce someone's monthly rent payment. The result is that more money stays with the person's family to pay for the things he/she needs. Below are just a few examples of rent calculations.

Young Family – Working Mother

Pay rate: \$7 / hour

Average hours / week: 24

Child support income: \$50 / week

Child care expense: \$40 / week

Number of children: 3

Total annual income: \$11,336

15% wage deduction: \$1,310

Income deduction for child care expense: \$2,080

Income deduction for minor children: \$1,440

Adjusted income: \$6,506

Adjusted income X 30% / 12 = Rent payment (including utilities): \$163

Senior Citizen – No Others in Household

Monthly social security benefit: \$400

Monthly medical prescription expense: \$150

Total annual income: \$4,800

Medical expense deduction: \$1,656

Senior Citizen deduction: \$400

Adjusted income: \$2,744

Adjusted income X 30% / 12 = Rent payment (including utilities): \$69

Conclusions and Recommendations

Public Awareness Residents don't know how to recognize discrimination. Individuals often times lack information on Fair Housing, specifically regarding their rights and their responsibilities on housing issues. Many impediments to Fair Housing could be addressed if residents were better informed.

Action 1- Support consumer educational programs such as first-time homebuyer.

Action 2- Participate in fair housing education efforts for City of Covington employees, and CDBG and HOME recipients.

Action 3- Provide information to the public on the city of Covington's housing programs via the website, brochures, newsletters and public events.

Action 4- Support fair housing through its affordable housing activities.

Action 5- Encourage local developers to create and maintain affordable housing opportunities for low and extremely low-income households.

Action 6- Continue to support agencies that assist the homeless.

Action 7- Provide additional information to the public on fair housing.

Action 8- Facilitate the availability of fair housing and equal opportunity information throughout the City of Covington.

Action 9- Actively support Fair Housing Month activities.

Historic Isolation Historical isolation of public housing has resulted in a higher number of low-income people living in concentrated geographic areas.

Action 1- Encourage mixed income neighborhoods throughout the community through economic integration using the NRSA status and demolishing Jacob Price to de-concentrate public housing.

Action 2- Continue work to provide affordable housing for anyone that needs it through the Home Rehabilitation Loan program and the Downpayment Assistance program.

Action 3- Physical improvements in traditionally minority occupied developments through the Emergency Repair loan program and Home Rehabilitation Loan program.

Fair Housing Enforcement Policies to deter differential treatment are necessary.

Action 1- Refer Fair Housing matters to the Covington Human Rights Commission so they can respond to and follow up on matters relating to illegal discrimination, including housing discrimination, in addition to providing education and resources on fair housing issues. The Human Rights Commission will continue to be the community's central location for residents to report housing discrimination.

Action 2- Post information on Fair Housing laws on the city's website.

Accessibility The economic feasibility of retrofitting apartment buildings for accessibility can be seen as an impediment to fair housing choice. Fixed or otherwise limited incomes present a financial barrier to a disabled person's ability to make necessary, physical modifications.

Action 1- Inform residents about their right to reasonable accommodations under fair housing law

Action 2- Through the City's Emergency Repair program, continue to make accommodations to the homes of disabled people to make them accessible. These accommodations include ramps, grab bars, and adjustment of counter heights.

Action 3- Continue to use CDBG funds throughout the City to construct curb cuts, thus making these areas wheelchair accessible.

Affordable Housing Affordability can be a barrier to housing choice when housing patterns and policies start to segregate households based on income.

Action 1- Encourage neighborhood revitalization through the City's newly approved NRSA status within older and low-income neighborhoods. Encourage residents and prospective residents to tackle issues associated with problematic properties.

Action 2- Through the NRSA, encourage downtown development that provides additional housing opportunities.

Action 3- Through the NRSA, encourage downtown development that improves the standard of living for low-income residents.

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www.census.gov

Appendices

HMDA Data sheets

Fair Housing Survey and Results

Landlord Fair Housing Survey and Results

Notices for Public Meetings

Section 8 Newsletter