June 2020

Analysis of Impediments to Fair Housing Choice
City of Moore, Oklahoma

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To Fair Housing Choice
Moore, Oklahoma

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1 INTRODUCTION

The Analysis of Impediments to Fair Housing Choice (AI) is required by the U.S. Department of Housing and Urban Development (HUD) communities receiving federal housing and community development funds including Community Development Block Grant (CDBG) funding. The overall goal of the AI is to review and assess impediments to fair housing within the City of Moore. 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 that restrict housing choice or the availability of housing choices.
- Any actions, omissions, or decisions that have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin.

The City of Moore's AI was developed in conjunction with required outreach, consultation, and coordination among various government agencies, private groups, public service agencies, City staff, and individuals. A list of participants in the AI is shown in the following Introduction section.

The primary federal resource for the City is the Community Development Block Grant (CDBG) program through the U.S. Department of Housing and Urban Development (HUD). The total funding for the City of Moore for Fiscal Year 2019 was $321,959 of CDBG funds. The AI consists of seven chapters, including:

1. Introduction
2. Purpose and Need for the Study
3. Demographic and Housing Condition Analysis
4. Records of Housing Discrimination
5. Review of Public Sector Policies
6. Review of Private Sector Practices, and
7. Impediments to Fair Housing Choice

Though several of the impediments identified in this report are beyond the direct control of the City of Moore, the City bears responsibility for identifying these issues and developing strategies to ensure that its housing market is as open and inclusive as possible. The impediments to fair housing choice identified in this report include the following, explained in detail in Section 7.

- Increased Access to Affordable Housing,
- Lack of Affordable Housing Organizations and Partners,
- Limited Housing Types and Affordable Options,
- Housing Condition Problems in Some Neighborhoods,
- Limited Access to Resources and Opportunities in Publicly Supported Housing Neighborhoods,
- Poverty and Limited Access to Resources and Opportunities for the Hispanic Population,
- Limited Supply of Housing for Persons with Disabilities,
- Lack of Public Transportation Infrastructure,

- Limited Public Funding and Programs for Affordable Housing, and
- Encourage Real Estate Sales and Property Management Companies to Include Fair Housing Language in Real Estate Listings and Promotional Materials.

2 *PURPOSE AND NEED FOR THE STUDY*

Title VIII of the Civil Rights Act of 1968 (and subsequent amendment in 1988) mandates that it is unlawful to discriminate in the sale, rental, or financing of housing or, in the provision of brokerage services or facilities in connection with the sale or rental of housing, based on:

- Race,
- Color,
- Religion,
- National origin,
- Sex,
- Families with children, and
- Persons with disabilities.

The U.S. Department of Housing and Urban Development (HUD) requires that all recipients of federal funds under the Community Development Block (CDBG), HOME Investment Partnership (HOME), Emergency Shelter Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) programs take actions to affirmatively further fair housing. This obligation includes conducting an analysis to identify impediments to fair housing choice within the jurisdiction. The City of Moore receives CDBG funding annually as a first-time HUD Entitlement Community, and therefore is required to update its Analysis of Impediments to Fair Housing Choice (AI).

The City's previous AI was prepared in July 2015. The purpose of this study is to update the 2015 Analysis of Impediments (AI) in accordance with HUD regulations under 24 CFR 570.904(c)(1) for Entitlement Community grantees of the U.S. Department of Housing and Urban Development. The City is committed to furthering fair housing within Moore.

A.   PREPARATION OF THE ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

The City of Moore principally administers it housing and community development programs through the Capital Planning and Resiliency Division of the Department of Community Development. The Capital Planning and Resiliency Division coordinates all Consolidated Planning initiatives of the City, including plan preparation with citizen participation and community collaboration. It is also the lead agency for the update of the Analysis of Impediments to Fair Housing Choice. The AI was prepared by RKG Associates, Inc., a planning, economic and real estate consulting firm working on behalf of the City of Moore.

B.   PARTICIPANTS IN THE ANALYSIS OF IMPEDIMENTS

The City of Moore Analysis of Impediments to Fair Housing Choice included input from city officials and key persons involved in housing and community development industry, and in particular, fair housing. In conducting the AI, the consultant collaborated with individuals and organizations that represent the interests of protected groups. Participants included:

- Department of Community Development,
- Oklahoma Housing Finance Agency,
- Aging Services, Inc.,
- Cleveland County Habitat for Humanity,
- Norman/Cleveland County Continuum of Care,
- Central Oklahoma Community Action Agency,
- Metropolitan Fair Housing Council, Oklahoma City, and
- U.S. Department of HUD Fort Worth Region IV Office.

C.   METHODOLOGY

This analysis has included a combination of quantitative and qualitative research. RKG Associates obtained the quantitative data from The Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T) developed by the Department of Housing and Urban Development (HUD), 2017 American Community Survey 5-Year Estimates (conducted by the U.S. Bureau of the Census), the 2010 Census, ESRI, an international supplier of geographic information system software and data, the Home Mortgage Disclosure Act, and relevant reports published by various local agencies. The qualitative component includes interviews with agency staff and others involved in the provision of fair housing and/or related services in the Moore area.

3 DEMOGRAPHIC AND HOUSING ANALYSIS

A.   INTRODUCTION

This section examines the existing demographic and housing characteristics of the City of Moore, Oklahoma by census tract and city level. It uses the categories, indexes, and data from the Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T) developed by the Department of Housing and Urban Development (HUD). Affirmatively Furthering Fair Housing (AFFH) is a legal requirement that federal grantees further the purposes of the Fair Housing Act, and the AFFH Data and Mapping Tool provides a system for HUD grant recipients to assess their efforts and challenges they have in such compliance.

The following analysis provides an overview and insights into seventeen demographic and housing topics included in the latest AFFH-T raw data. The latest data version that the RKG team used is Version AFFHT0004a - February 2018. Also, the analysts complement the study with population, household, and household income data and projections of 2010, 2019 and 2024 obtained from ESRI, an international supplier of geographic information system software and data, and the 2010 Census.

B.   POPULATION, HOUSEHOLDS, AND HOUSEHOLD INCOME TRENDS

1.   Population Trends

The City of Moore's population was estimated at 62,736 people in 2019 according ESRI, which accounted for 21.4% of the County's population of 291,931. As a share of the County's population, the City has not lost its position since 2010 and is projected to retain 21.5% of the population in 2024.

Like Cleveland County, the City experienced population growth at a pace faster than the State of Oklahoma between 2010 and 2019. Also, it is projected to remain so between 2019 and 2024. The city-level annual population growth rate of 1.54% since 2010 is slightly below the County level (1.57%), but a faster growth than the County (1.35% compared to 1.32%) is estimated between 2019 and 2024 (Table 3-1, Figure 3-1).

Figure 3-1
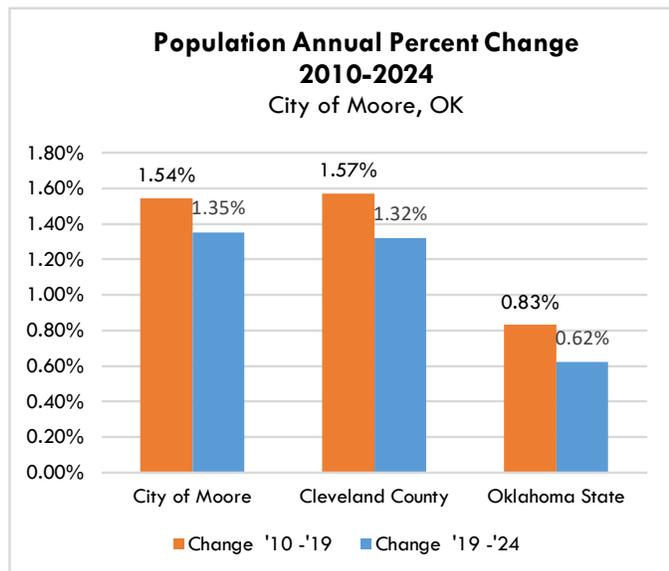
Source: ESRI and RKG Associates, Inc., 2020

All seventeen census tracts within the City of Moore have experienced population increases between 2010 and 2019, and such gains are projected to continue through 2024. Census tracts that are projected to see additional population growth between 2010 and 2024 are in the eastern part of the City adjacent to highway 77H and the south along I-35 (Map 3-1).

Table 3-1

Population Trend, 2010-2024

City of Moore, Cleveland County, and State of Oklahoma

	2010	2019	2024	Change '10 -'19		Change '19 -'24	
				Actual Chg.	Ann. % Chg.	Actual Chg.	Ann. % Chg.
City of Moore	55,083	62,736	66,982	7,653	1.54%	4,246	1.35%
Cleveland County	255,755	291,931	311,232	36,176	1.57%	19,301	1.32%
Oklahoma State	3,751,351	4,031,901	4,157,210	280,550	0.83%	125,309	0.62%

Source: ESRI and RKG Associates, Inc., 2020

Map 3-1
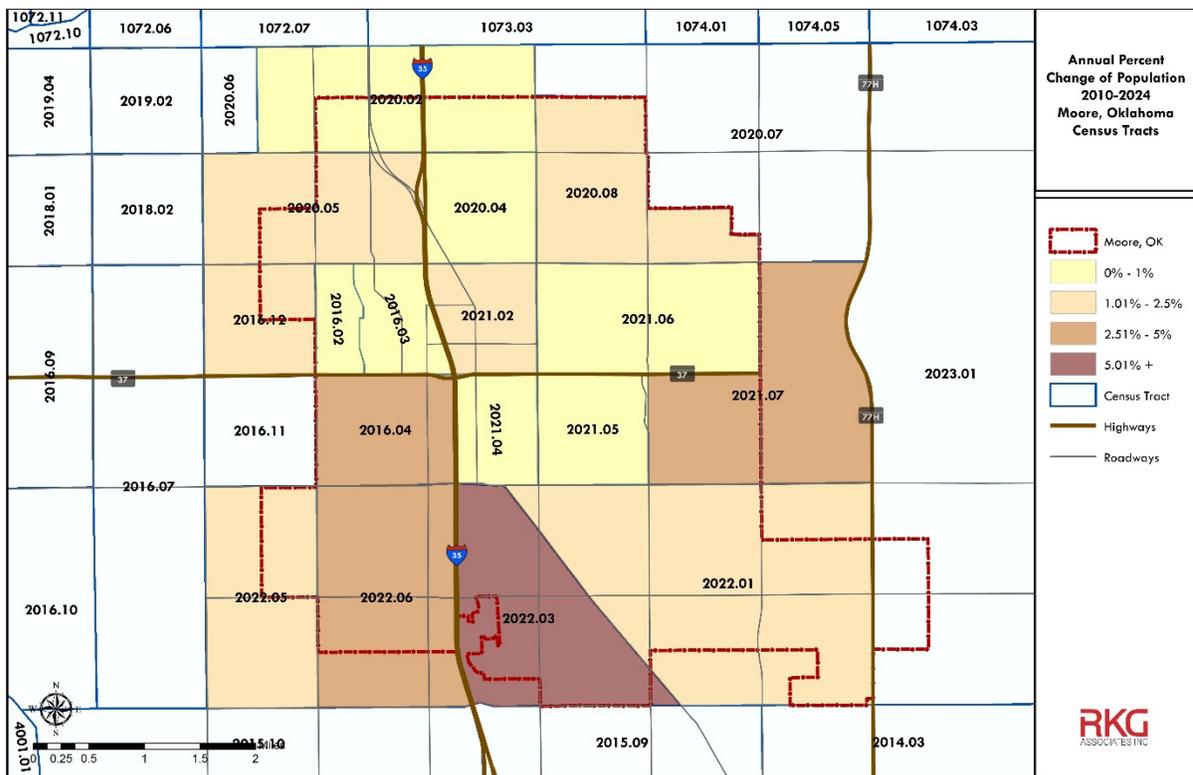
2.   Household Trends and Household Size

The household changes between 2010 and 2019 in the City of Moore, Cleveland County and the State of Oklahoma all follow a trend similar to the population growth, while at slightly slower annual rates, as the average household sizes in the three areas are all increasing (Figure 3-2). In particular, the City of Moore had an average household size larger than the County and the State in 2010, and the same was true in 2019. By 2024 it is projected to stabilize at 2.70 persons per household compared to 2.52 in Cleveland County and the State of Oklahoma in 2019. This indicates that compared to the County and the State, the City of Moore has seen a growth of larger households since 2010 (Table 3-2).

Table 3-2

Household Trend, 2010-2024

City of Moore, Cleveland County, and State of Oklahoma

	2010	2019	2024	Change '10 -'19		Change '19 -'24	
				Actual Chg.	Ann. % Chg.	Actual Chg.	Ann. % Chg.
City of Moore	20,447	23,139	24,666	2,692	1.46%	1,527	1.32%
Cleveland County	98,306	111,649	118,879	13,343	1.51%	7,230	1.30%
Oklahoma State	1,460,450	1,555,881	1,600,138	95,431	0.73%	44,257	0.57%
Average Household Size							
City of Moore	2.68	2.70	2.70	N/A	N/A	N/A	N/A
Cleveland County	2.49	2.52	2.53	N/A	N/A	N/A	N/A
Oklahoma State	2.49	2.52	2.53	N/A	N/A	N/A	N/A

Source: ESRI and RKG Associates, Inc., 2020

3.   Median Household Income

As shown in Table 3-3, the median household income in the City of Moore was higher than both the County and the State levels in 2010 and in 2019, and it is projected to increase at a faster rate of 2.20% compared to 1.96% in the County and 1.77% in the State between 2019 and 2024. Map 3-2 shows that the census tracts with the highest median household incomes within the City of Moore are located on the east side and in the south of the City, generally matching the census tracts with the fastest population growth since 2010. The Old Town area has the lowest median household income, as well as areas west and north to the Old Town along I-35. All census tracts are projected to experience between 1% and 6% increase in the median household income between 2019 and 2024, with the Old Town neighborhood estimated to see the fastest annual growth of its median household income at a rate above 4.5% per year (Map 3-3).

Figure 3-2

Household Annual Percent Change 2010-2024
City of Moore, OK
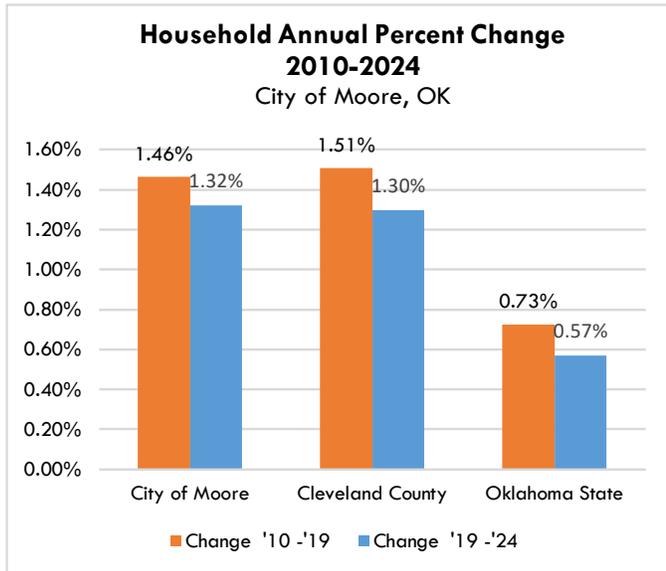
Source: ESRI and RKG Associates, Inc., 2020

Table 3-3

Median Household Income Trend, 2010-2024

City of Moore, Cleveland County, and State of Oklahoma

	2010	2019	2024	Change '10 -'19		Change '19 -'24	
				Actual Chg.	Ann. % Chg.	Actual Chg.	Ann. % Chg.
City of Moore	$55,710	$61,287	$68,029	$5,577	1.11%	$6,742	2.20%
Cleveland County	$52,688	$59,940	$65,826	$7,252	1.53%	$5,886	1.96%
Oklahoma State	$50,051	$50,697	$55,176	$646	0.14%	$4,479	1.77%

Source: 2010 Census, ESRI and RKG Associates, Inc., 2020

Map 3-2

Median Household Income, 2019 Moore, Oklahoma Census Tracts

Map 3-3

Median Household Income Annual Percent Change 2019-2024 Moore, Oklahoma Census Tracts
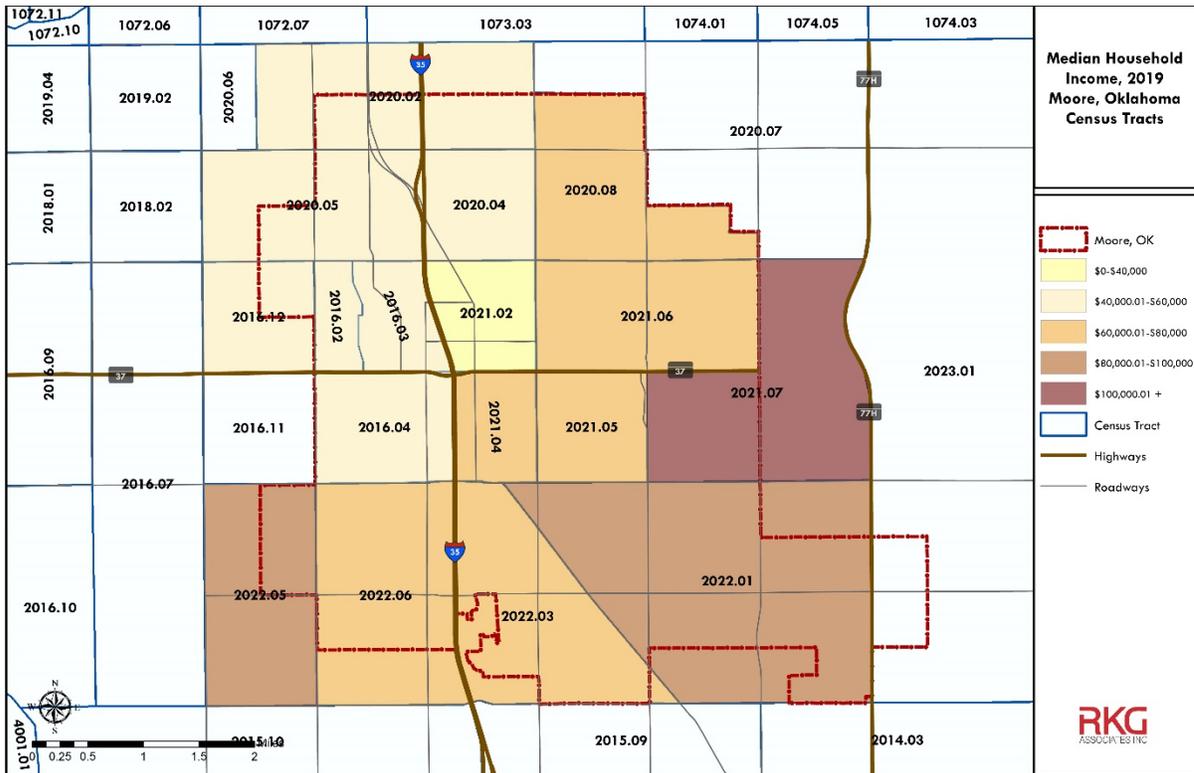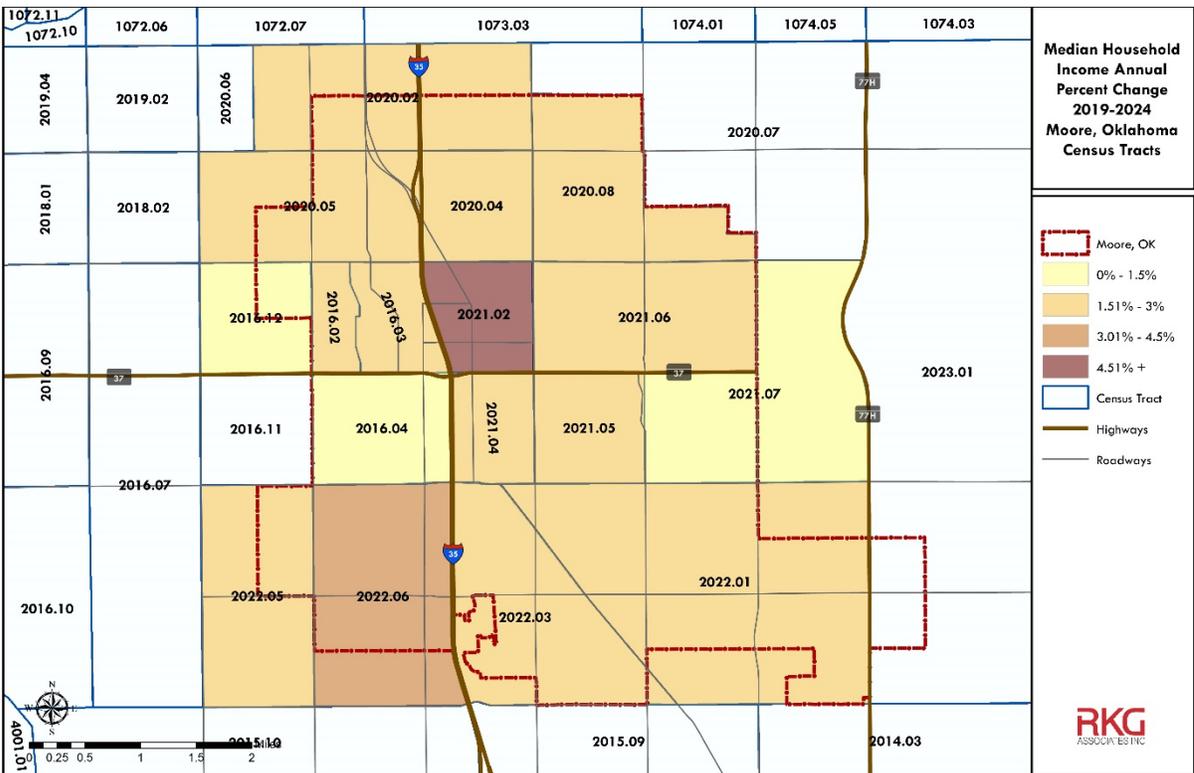
C.   RACE AND ETHNICITY

1.   Racial/Ethnic Trends and Composition

The City's White population accounted for the largest share of the population in 2019, followed by Hispanic people at 11.8%, and African Americans at 5.9% (Figure 3-3). African Americans, who represent over 12% of the U.S. population, comprise less than 6% of the City's population.   It should be noted that the term "Hispanic" does not refer to a racial group.   The United States   Census   Bureau   uses   the ethnonyms "Hispanic or Latino" to refer to "a person of Cuban, Mexican, Puerto Rican, South or Central American, or other   Spanish   culture   or   origin regardless   of   race"   and   states   that Hispanics or Latinos can be of any race, any ancestry, any ethnicity.[1]

The   Native   American   population represented   just   4.7%   of   the   City's population in 2019, was 4.7 times the national share at 1%. However, ESRI

Figure 3-3

Racial and Ethnic Composition, 2000-2019
City of Moore, OK

Source: ESRI and RKG Associates, Inc., 2020

reports that the population of Native Americans has declined since 2010, when this group comprised 7.25% of the local population.

Most racial and ethnic groups experienced population gains between 2000 and 2010, including the African American population, people of All Other Race and people with Hispanic ethnicity, which grew by over 10% annually. Proportionally, all Minority (Non-White) groups also saw a steady rise of their population shares during this decade, while the White population share reduced from 82.2% to 74.6% due to a slower population growth compared to other minority groups.

Since 2010, the growth of all racial groups has slowed. People of Hispanic Ethnicity and people of All Other Race have maintained strong annual population growth (5.8% and 4.9% respectively), and most of the remaining racial groups have seen a slower but modest population increase during the same period. As stated previously, the Native American population is the only group that experienced a numerical population loss of 2.9% annually between 2010 and 2019 and its population share dropped from 7.25% in 2010 to 4.70% in 2019. Proportionally, the White population has seen a small uptick of its population share during the most recent decade, while the share of the All Minority (Non-White) group fell slightly from 25.41% in 2010 to 25.20% in 2019 (Figure 3-3, Table 3-4).

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[1] Wikipedia, https://en.wikipedia.org/wiki/Hispanic
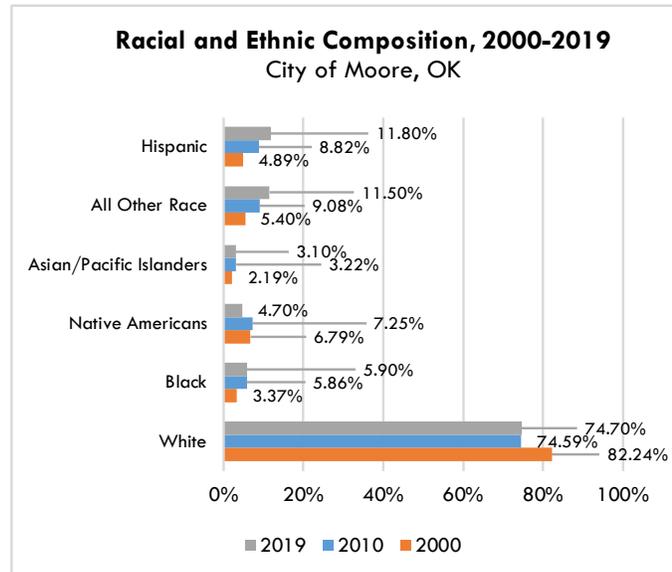
Table 3-4

Racial and Ethnic Composition of Population and Trend, 2000-2019
City of Moore, Oklahoma

Persons	2000		2010		2019		Chg. '00-'10		Chg. '10-'19	
	Count	Percent	Count	Percent	Count	Percent	Actual Chg.	Ann. % Chg.	Actual Chg.	Ann. % Chg.
Total	**41,148**	**100.00%**	**55,152**	**100.00%**	**62,735**	**100.00%**	**14,004**	**3.40%**	**7,583**	**1.53%**
White	33,841	82.24%	41,138	74.59%	46,863	74.70%	7,297	2.16%	5,725	1.55%
Black	1,388	3.37%	3,232	5.86%	3,701	5.90%	1,844	13.29%	469	1.61%
Native Americans	2,795	6.79%	4,000	7.25%	2,949	4.70%	1,205	4.31%	(1,051)	-2.92%
Asian or Pacific Islanders	900	2.19%	1,774	3.22%	1,945	3.10%	874	9.71%	171	1.07%
All Other Race	2,224	5.40%	5,008	9.08%	7,215	11.50%	2,784	12.52%	2,207	4.90%
All Minority (Non-White)	7,307	17.76%	14,014	25.41%	15,810	25.20%	6,707	9.18%	1,796	1.42%
Hispanic Ethnicity	2,011	4.89%	4,862	8.82%	7,403	11.80%	2,851	14.18%	2,541	5.81%

Source: HUD AFFH Data Version AFFHT0004a, ESRI and RKG Associates, Inc., 2020

2.   Racial/Ethnic Concentration

Federal regulations at Title 24 Housing and Urban Development Part 91.210 "Housing Market Analysis" require grantees of HUD Community Planning and Development programs to identify and describe any areas within their jurisdictions that have concentrations of racial/ethnic minorities and/or low-income families. HUD currently leaves the determination of thresholds defining "concentrations" up to each local grantee.

The approach currently applied by HUD's Office of Policy Development and Research calls for an evaluation of population distribution in two primary categories: White, which includes any Census respondent who identifies as White and non-Hispanic, and minority, which includes any respondent identifying as a member of a non-White racial group or Hispanic ethnicity. Hispanic White people would be in the latter category.

RKG defined concentrations of minority populations as census tracts with non-White populations greater than 150% of the city-wide percentage of the combined minority population. For example, if the Hispanic population equaled 11.8% of the City's population in 2019, then census tracts with Hispanic population shares of 17.7% or greater would be classified as a concentration.

In fact, there was only one census tract that had a concentration of Hispanic population (using ESRI 2019 demographic data). Map 3-4 illustrates this census tract 2020.05. The Hispanic population accounts for 19.1% of the total population in this census tract, which is 161.8% of the city average of 11.80% in 2019. This census tract also has the highest percentage of racial minorities within the city—though not technically classified as a concentration—of 34.21%, which is 135.8% of the city average of 25.2%.

Map 3-4
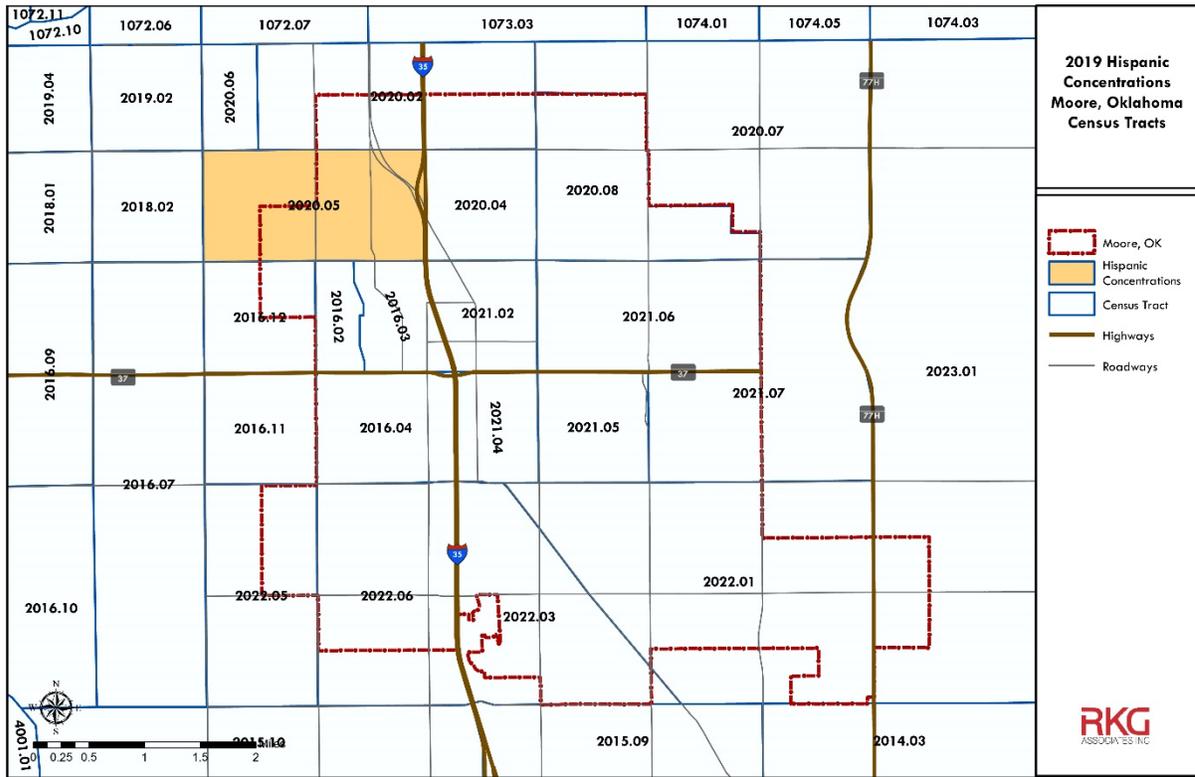
D.   RACIAL/ETHNIC DISSIMILARITIES

Another factor related to the geographic distribution of racial and ethnic groups within a jurisdiction is the Racial Dissimilarity Index included in the HUD AFFH-T database. According to HUD's definition, "the dissimilarity index represents the extent to which the distribution of any two groups (frequently racial or ethnic groups) differs across census tracts or block groups". In other words, the Index measures how much one racial/ethnic group is spatially separated from another within a jurisdiction. The data for each racial/ethnic group is presented in comparison to the White segment of Moore's population.

The Dissimilarity Index has values between 0 and 100, with a score of 0 representing perfect integration and a value of 100 corresponding with total segregation. A Dissimilarity Index below 40 represents low segregation, a value between 40 and 55 suggests moderate segregation, and a score above 55 indicates high segregation. The year 2010 is the most current data series from HUD. Table 3-5 displays the Dissimilarity Index values for the City of Moore between 2000 and

Table 3-5

Dissimilarity Index by Race/Ethnicity, 2000-2010
City of Moore, Oklahoma

	2000	2010
Non-White/White	6.54	6.50
Black/White	16.23	12.02
Asian/Pacific Islander/White	21.27	17.52
Hispanic/White	7.08	11.86

Source: HUD AFFH Data Version AFFHT0004a and RKG Associates, Inc., 2020

2010. All the scores are below 40, indicating low segregation between racial and ethnic minority groups and the White population.

E.   PLACE OF NATIONAL ORIGIN

According to the definition of the U.S. Census Bureau, the foreign-born population includes anyone who is not a U.S. citizen at birth, including those who become U.S. citizens through naturalization. Limited English Proficiency is used to refer to a person who is not fluent in the English language, often because English is not their native language. Understanding the foreign-born population and people with limited English proficiency is important for identifying the impediments to fair housing choice as well as associated solutions in the City of Moore, as these groups of the population often have more limited fair housing options, usually due to cultural and language barriers.

According to the HUD AFFH data, the foreign-born population in the City of Moore is 2,829, accounting for 5.1% of the total population (Table 3-6). The largest foreign-born group is the Mexican population, constituting almost one-third of the total foreign-born population in the City. The second-largest immigration group is the Vietnamese population, followed by persons from Korea, Guatemala, and the Philippines. Only 3.1% of the total population in the City has limited English proficiency. Within this group, over half of them speak Spanish, followed by Vietnamese, African, Korean, and Thai (Table 3-7).

Between 2010 and 2013, both the foreign-born population and the population with limited English proficiency have seen steady growth at annual rates of 6.71% and 7.84% respectively. The shares out of the total population of these two groups also climbed up during the three years according to the HUD AFFH data (Table 3-8).

Table 3-6

**Population by Top 5 Most Populous National Origin Groups
City of Moore, Oklahoma, 2013**

	Count	% of Total Population
Total Foreign-Born Population	**2,829**	**5.14%**
Mexico	909	1.74%
Vietnam	252	0.48%
Korea	210	0.40%
Guatemala	195	0.37%
Philippines	118	0.23%
All Other Foreign-Born Population	1,145	2.08%

Source: HUD AFFH Data Version AFFHT0004a and RKG Associates, Inc., 2020

Table 3-7

**Limited English Proficiency Persons by Top 5 Most Populous Languages
City of Moore, Oklahoma, 2013**

	Count	% of Total Population
Total Population with Limited English Proficiency	**1,681**	**3.05%**
Spanish	1,081	2.07%
Vietnamese	183	0.35%
African	94	0.18%
Korean	89	0.17%
Thai	88	0.17%
All Other Languages	146	0.26%

Source: HUD AFFH Data Version AFFHT0004a and RKG Associates, Inc., 2020

Table 3-8

**Foreign-Born Population and Limited English Proficiency Persons
City of Moore, Oklahoma, 2010-2013**

	2010	2013	Chg. '10-'13 Actual Chg.	Chg. '10-'13 Ann. % Chg.
Foreign-Born Population				
Number	2,355	2,829	474	6.71%
Percent of Total Population	4.27%	5.14%	N/A	N/A
Limited English Proficiency Persons				
Number	1,361	1,681	320	7.84%
Percent of Total Population	2.47%	3.05%	N/A	N/A

Source: HUD AFFH Data Version AFFHT0004a and RKG Associates, Inc., 2020

F.   DISABILITY BY TYPE AND AGE GROUP

The Americans with Disabilities Act (ADA) defines a person with a disability as "a person who has a physical or mental impairment that substantially limits one or more major life activity". People with disabilities may face more barriers to fair housing options as they often need special physical accommodations in the housing and are more likely to experience housing discrimination.

Ambulatory difficulty is the most common type of disability for Moore resident, with 6.9% people experiencing difficulty walking, followed by people with cognitive difficulty, which inflicts 4.9% of the total population. It should be noted that a person can have more than one type of disability, and therefore can be counted more than once under multiple disability categories (Figure 3-4).

Three census tracts (2016.02, 2016.03 and 2021.02) have over 10% of the population reporting ambulatory difficulty. Also, compared to other types of disabilities, ambulatory difficulty and cognitive difficulty present more apparent geographic disparities across census tracts, with some neighborhoods seeing higher proportions of their population with these two types of disability.

Most people with disabilities in the City of Moore are between 18 and 64 years old, according to the HUD AFFH data, accounting for 7.92% of the total population (Figure 3-5).

Figure 3-4

Persons with Disabilities by Type, 2013
City of Moore, OK
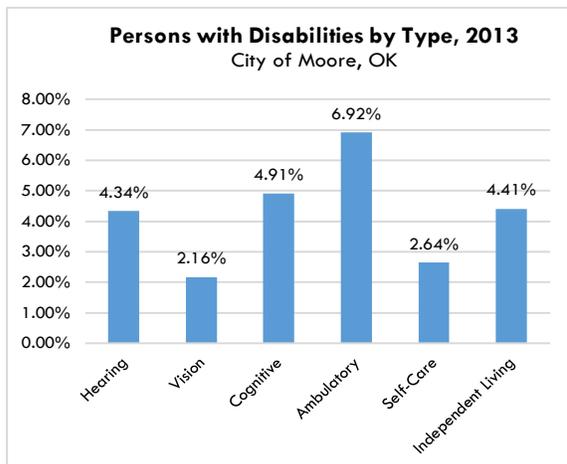
Source: HUD AFFH Data Version AFFHT0004a and RKG Associates, Inc., 2020

Figure 3-5

Persons with Disabilities by Age, 2013
City of Moore, OK
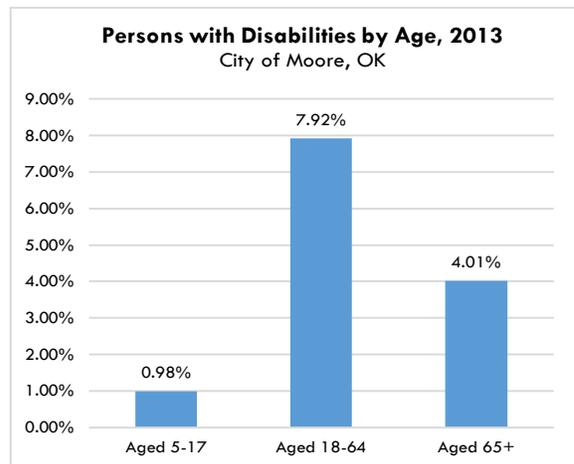
Source: HUD AFFH Data Version AFFHT0004a and RKG Associates, Inc., 2020

Table 3-9

Percent of Persons with Disabilities of Total Population by Type, 2013
City of Moore Census Tracts, Oklahoma

	With Hearing Difficulty	With Vision Difficulty	With Cognitive Difficulty	With Ambulatory Difficulty	With Self-Care Difficulty	With Independent Living Difficulty
2016.02	5.89%	3.89%	5.89%	11.22%	3.36%	5.78%
2016.03	5.02%	2.13%	7.05%	10.48%	4.08%	8.29%
2016.04	6.66%	5.90%	7.87%	8.45%	2.05%	6.95%
2016.12	2.73%	4.25%	5.22%	6.63%	3.50%	4.35%
2020.02	7.49%	2.52%	4.61%	6.20%	1.43%	5.48%
2020.04	7.51%	5.34%	5.53%	8.04%	1.95%	4.46%
2020.05	4.41%	2.25%	7.96%	9.63%	2.42%	5.48%
2020.08	3.15%	2.10%	4.92%	4.25%	1.48%	3.71%
2021.02	4.27%	1.04%	7.79%	11.93%	3.02%	5.72%
2021.04	4.61%	1.23%	5.35%	8.19%	4.76%	4.27%
2021.05	0.83%	1.14%	1.44%	4.09%	1.44%	2.60%
2021.06	5.10%	2.77%	2.59%	4.88%	3.09%	2.51%
2021.07	3.66%	0.97%	4.25%	6.69%	3.66%	4.25%
2022.01	6.33%	0.79%	5.24%	8.64%	4.81%	5.08%
2022.03	3.73%	2.36%	3.16%	4.78%	2.42%	3.01%
2022.05	1.63%	0.00%	1.79%	3.04%	1.11%	0.55%
2022.06	1.03%	0.00%	1.77%	1.99%	0.00%	2.28%

Source: HUD AFFH Data Version AFFHT0004a and RKG Associates, Inc., 2020

G.   POVERTY INDEX

The poverty level of the population within a jurisdiction to a great extent is associated with how easy the community can access opportunities and resources including housing. If a community is very likely to be exposed to poverty, then the residents may encounter more barriers to fair and affordable housing options, for example, not being qualified for mortgage applications due to low income levels. HUD's Low Poverty Index uses family poverty rates (based on the federal poverty line) to measure how much a community is exposed to poverty. The Low Poverty Index has scores ranging from 0 to 100, and a higher value represents less exposure to poverty in a neighborhood.

Figure 3-6 indicates a disparity of exposure to poverty among the different racial/ethnic groups within the

Figure 3-6

Low Poverty Index by Race/Ethnicity
City of Moore, OK

White: 61.38
Black: 61.57
Native American: 59.49
Asian/Pacific Islander: 64.22
Hispanic: 55.93
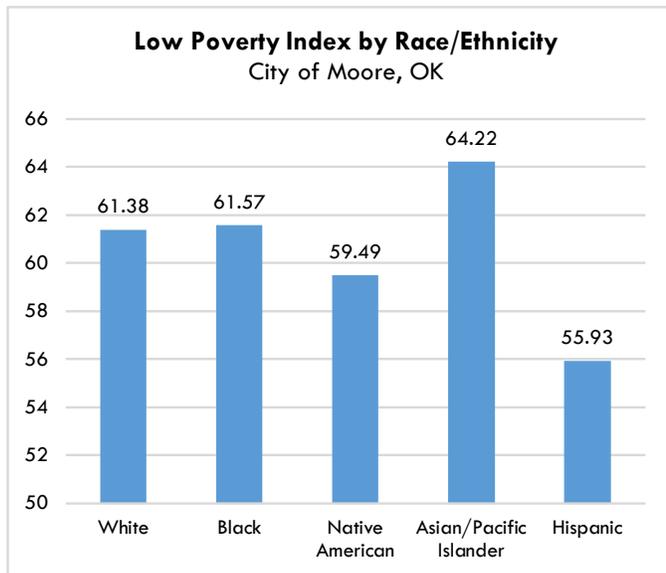
Source: HUD AFFH Data Version AFFHT0004a and RKG Associates, Inc., 2020

City of Moore. The Asian/Pacific Islander population with the highest score of 64.2 has the least exposure to poverty, while the Hispanic population has a score almost ten points lower (55.9) and thus has the greatest exposure to poverty compared to other racial/ethnic groups.

As shown on Map 3-5, there also exists a geographic disparity of poverty levels across the City. The census tract with the lowest Low Poverty Index score is 2020.05, which also has a concentration of the Hispanic population and the highest percentage of racial minority groups compared to other census tracts within the City of Moore. This result corresponds with the conclusion that the Hispanic population in the City has the most exposure to poverty. This map also echoes the median household income map in that census tracts with low scores and thus high poverty levels generally have lower median household incomes, located on the northwest side and in the middle of the city along I-35. Besides, this map shows once again that census tracts with the lowest poverty levels are generally located on the east and south sides of the City.

Map 3-5
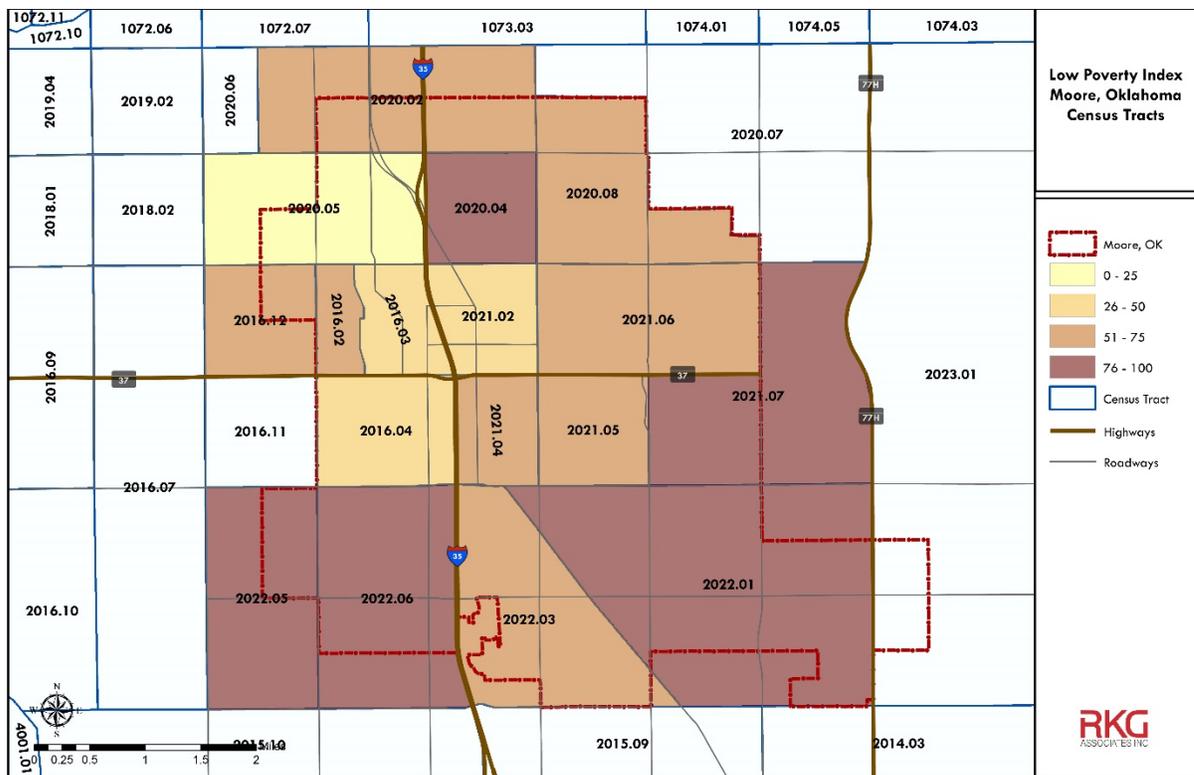
H.   SCHOOL PROFICIENCY INDEX

School proficiency is an indicator of the quality of the education available to a given community. A higher quality education quality is usually associated with better access to opportunities and higher income in addition to a higher quality of life. HUD's School Proficiency Index is based on the test scores of elementary schools within an area and measures which neighborhoods have high-performing elementary schools nearby. The values of the index range from 0 to 100 and higher scores indicate higher school system quality in a community.

Figure 3-7

Source: HUD AFFH Data Version AFFHT0004a and RKG Associates, Inc., 2020

Like the results from the Low Poverty Index analysis, a disparity of access to quality education exists among the different racial/ethnic groups in Moore (Figure 3-7). Asian/Pacific Islanders in the City has the highest School Proficiency Index score of 66.0, compared to the Hispanic population, which has the lowest score of 56.21. The Native American population has the second-lowest score of 56.95, indicating that this group along with the Hispanic population has comparatively much less access to high education quality.
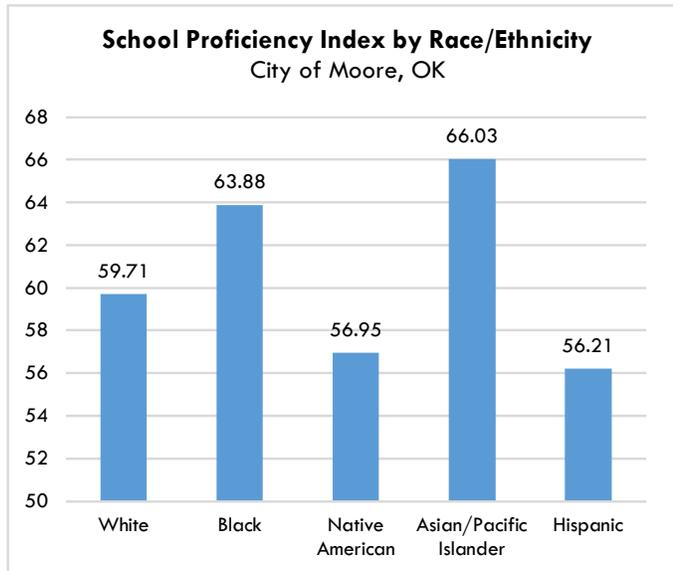
Map 3-6 illustrates the School Proficiency Index values by block group in the City, with darker colors indicating higher values and thus better elementary school performances. The lowest performing census tracts in terms of school proficiency (below a value of 25) tend to be located on the west side of intersection of Interstate 35 and state highway 37 through the middle of Moore. This is the area most impacted by the F-5 tornado that hit Moore in 2013 and damaged or destroyed nearly 1,800 homes. Since 2013, approximately 635 new homes have been rebuilt in that area.[2]

The cluster of impacted census block groups include: 2016023, 2016031, 2016033, 2016041, 2016042, and 2021041. Census block group 2020022 at the northern edge of the City also indicates poor school proficiency.

Map 3-6
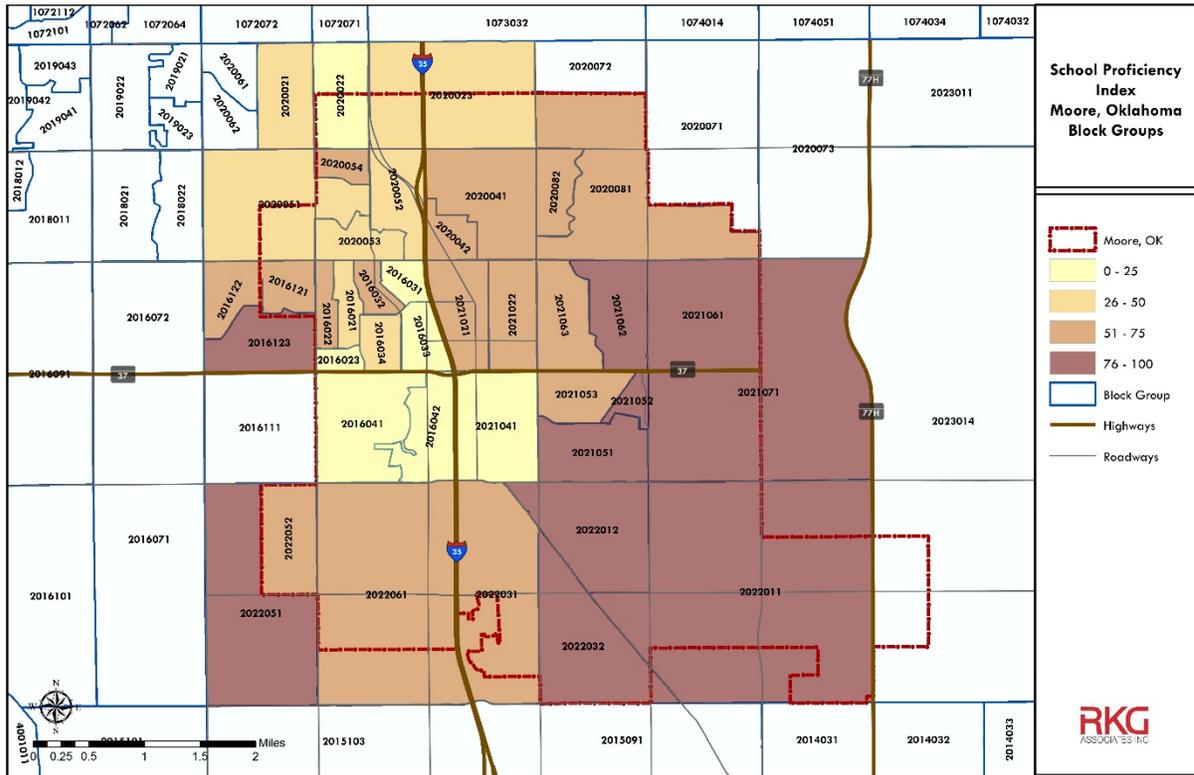
I. JOB PROXIMITY INDEX

HUD measures a community's access to employment opportunities with the Job Proximity Index and Labor Market Engagement Index. Job Proximity Index quantifies the distance between a given block group and employment centers within a Core Based Statistical Area (CBSA). The index values range from 0 to 100, with higher scores indicating better access to job opportunities for residents in a neighborhood.

As Figure 3-8 indicates, the Native American population in the City of Moore resides in the closest proximity to jobs, with the highest score of 48.3, followed by the Hispanic population, with a score of 47.9. The Black population, in contrast, resides the furthest away from employment centers, with the lowest score of 44.2.

Figure 3-8
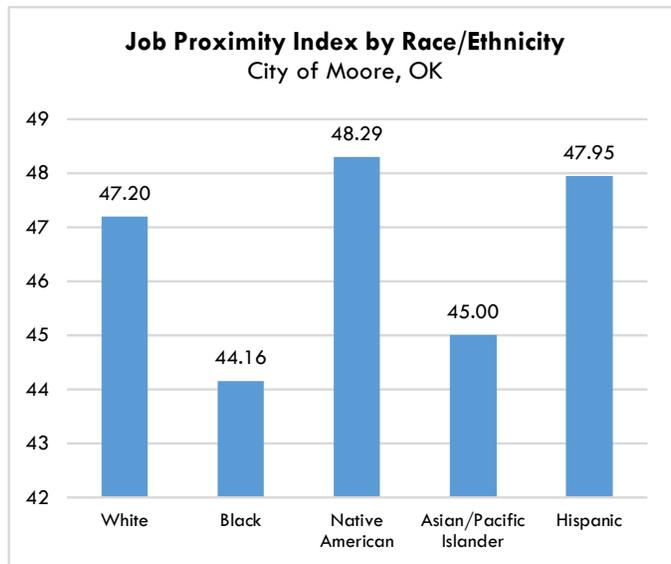
Source: HUD AFFH Data Version AFFHT0004a and RKG Associates, Inc., 2020

Map 3-7 illustrates the Job Proximity Index values by block group, with darker colors indicating higher values and therefore closer proximity to job opportunities. It can be seen from the map that neighborhoods along the I-35 are closer to jobs compared to the rest of the City because of their immediate access to the major highway. Much of Moore's employment base is clustered near I-35 interchanges at Exits 116, 117, and 119A.

Map 3-7
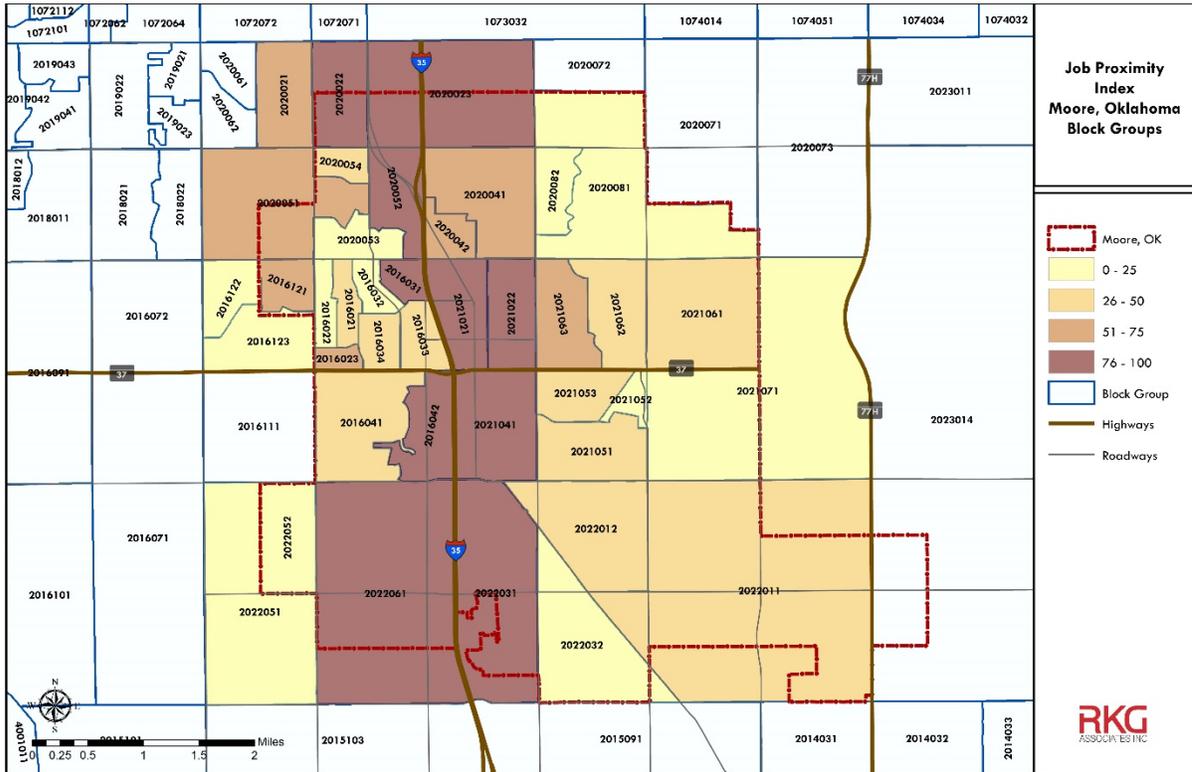
J.   LABOR MARKET ENGAGEMENT INDEX

In addition to the proximity to job centers, HUD also measures a neighborhood's job access with the Labor Market Engagement Index, which, according to HUD's description, "provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood". The Index is based on the unemployment rate, labor force participation rate, and educational attainment data. This is because distance alone cannot represent all the other factors that influence a community's access to employment opportunities, such as the types of jobs available, and whether the education and skills these jobs require match the education attainment levels of the residents in a neighborhood. The index values range from 0 to 100, with higher scores representing higher labor force participation and human capital in the community.

Like the results from the Low Poverty Index and the School Proficiency Index, there is a disparity among racial/ethnic groups in labor market engagement and human capital in Moore. The Asian/Pacific Islander population in the City has the highest Labor Market Engagement Index score at 60.2. This finding suggests that this racial group has the closest match between the local jobs and the people that access those jobs.

The Hispanic population has the lowest score of 54.9 and the Native American population has the second-lowest score of 56.2 have lower levels of engagement in the labor market and human capital compared to other groups.

Figure 3-9
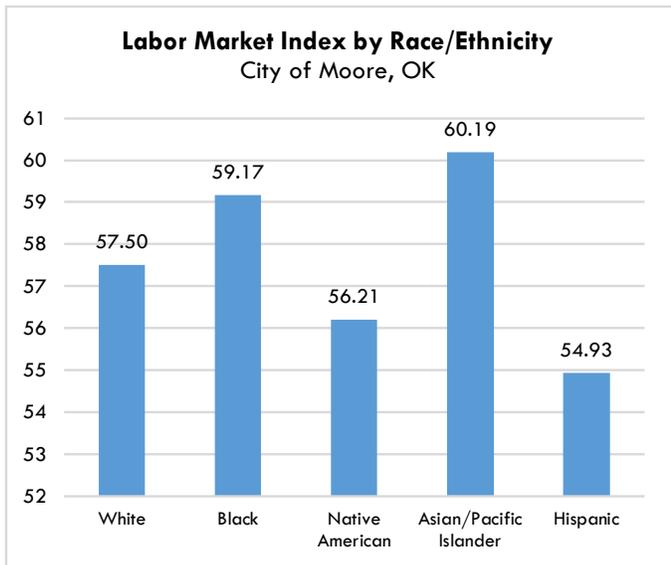
Source: HUD AFFH Data Version AFFHT0004a and RKG Associates, Inc., 2020

Labor Market Engagement Index values by census tract vary throughout the City, with darker colors indicating higher levels of labor market engagement and human capital, and therefore, better access to employment opportunities in a neighborhood. The data indicate that the greatest access to employment is achieved in the eastern and southwest parts of the City and the lowest access is seen north of Highway 37 on either side of Interstate 35 (Map 3-8).

Map 3-8
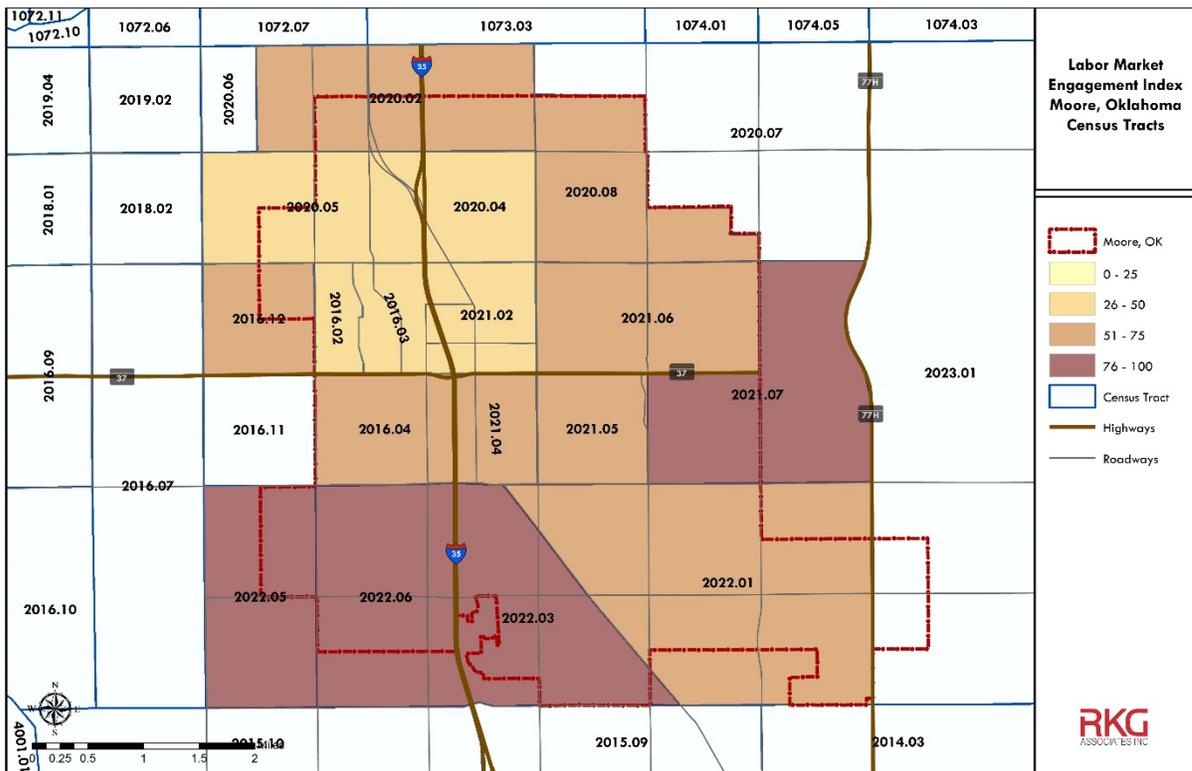
K.   TRANSIT TRIP INDEX

A community's access to opportunities is also influenced by the levels of mobility and availability of low-cost transportation options. This can be measured by HUD's Transit Index and Low Transportation Cost Index. Both indices are based on the data of 3-person, single-parent families with income at 50 percent of the median income for renters in the region, with values ranging from 0 to 100. The higher the Transit Trip Index value, the more likely residents in a neighborhood utilize public transit. The Transit Trip Index controls for income such that a higher index score will often reflect better public transit access.

The Transit Trip Index scores of Moore's racial/ethnic groups fall into a narrow range, indicating that there is not too much a disparity of public transit

Figure 3-10

Source: HUD AFFH Data Version AFFHT0004a and RKG Associates, Inc., 2020

usage. This is largely because Moore's public transit system is quite limited. The Native American population is most likely to use public transit, with the highest score of 25.3, closely followed by the White and the Hispanic population, with scores of 25.2 and 25.1, respectively. The Black population has the lowest score of 24.7 and is least likely to use public transit compared to other racial/ethnic groups in Moore. However, some neighborhoods, along Highway 37, including the Old Town have higher scores between 26 and 50. It represents that residents living in these neighborhoods are a little more likely to use public transit compared to the rest of the City.

As the City of Moore does not officially provide public transit services currently, it can be seen from the map that the majority of the neighborhoods in the City have fairly low Transit Trip Index scores of 25 or below, indicating that the majority of the City is not very likely to use public transit (Map 3-9). However, the Regional Transit Authority of Central Oklahoma has been recently formed. This will be a collaborative effort with Oklahoma City, Edmond, Del City, Midwest City, and Norman. This authority is made up of representatives from each city. They will work on a regional funding plan for the transit system which will aim to connect member cities via commuter rail and a bus system. Local officials are hoping to approve the regional funding mechanism within the next two to four years. Within the next 10 years, the plan is to have a fully interconnected metropolitan bus system and commuter train. The transit system would have four stops in Norman, two stops in Moore, and expanded urban transportation options in Oklahoma City.
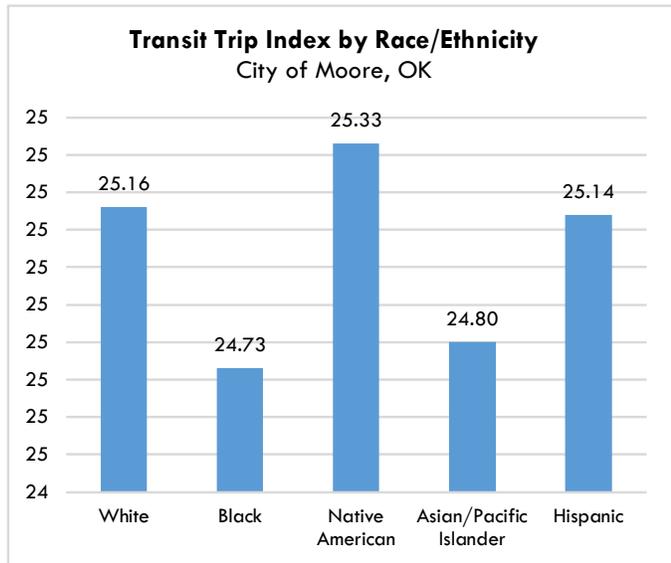
Map 3-9
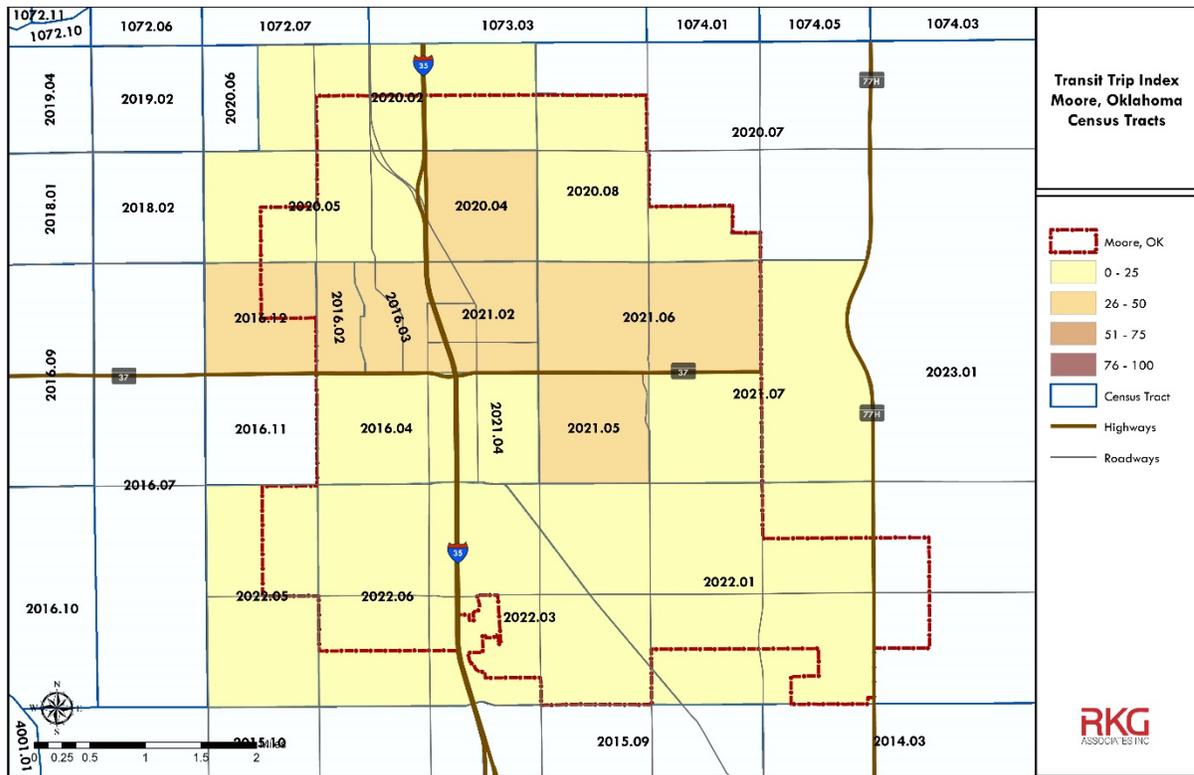
The City of Moore is promoting transit services to certain targeted groups, mostly seniors within the community. These services include:

- **EMBARK**
  EMBARK partners with many community organizations to provide a wide range of transportation programs to meet the diverse needs of the community. Through these programs, qualified citizens ages 60 and older who live in the service area can maintain independence by arranging their own transportation. This program requires arrangements to be made prior to the date transportation is needed. This donation-based service is sponsored by the Areawide Aging Agency & EMBARK.

- **The Brand Senior Center**
  The Brand Senior Center in Moore offers a program by appointment only to provide transportation within the Moore city limits to the citizens of Moore over the age of 55. A transportation bus owned and operated by the Moore Council on Aging (MCOA) provides rides for senior citizens from their addresses in the Moore city limits to the Brand Center or to banks, stores, the library, doctor's offices, and other places within the city.

- **SoonerRide**
  SoonerRide is a program to you get to and from your SoonerCare appointments. They partner with LogistiCare Solutions LLC to provide this non-emergency transportation service for both the SoonerCare Traditional and SoonerCare Choice programs. SoonerRide arranges to take you to medically necessary services covered by SoonerCare. You must call at least three business days before your appointment to arrange for your ride. A trip authorization number must be obtained in advance through the reservation line for gas/mileage reimbursement.

- **Share-A-Fare**
  Share-A-Fare provides a 40-percent discount on taxi fares for senior adults and persons with disabilities who live in a participating area. Coupon books must be purchased in the city where the resident lives.[3]

L.   LOW TRANSPORTATION COST INDEX

Another HUD indicator that evaluates the transportation opportunity access of a community is the Low Transportation Cost Index. It measures the cost of transport by neighborhood. The index values also range from 0 to 100, and the higher the index score, the lower the cost of transportation in that community. Transportation costs may be low for several reasons, including greater access to public transportation and the density of homes, services, and jobs in the neighborhood and surrounding community.

The Low Transportation Cost Index scores of the different racial/ethnic groups in Moore are close in value. The Native American population has the lowest transportation cost compared to other racial/ethnic groups, with the highest score of 38.2, followed by the Hispanic population with a score of

Figure 3-11

Low Transportation Cost Index by Race/Ethnicity
City of Moore, OK

Source: HUD AFFH Data Version AFFHT0004a and RKG Associates, Inc., 2020

37.8. The Asian/Pacific Islander population has the highest transportation cost among all racial/ethnic groups, with the lowest score of 35.1.

The Low Transportation Index scores exhibit a geographic difference across the City. Neighborhoods on the east side of the City have the lowest scores and the highest transportation costs, while the neighborhoods around the Old Town and people living in the north tip of the City have the lowest transportation costs compared to the rest of the City (Map 3-10).
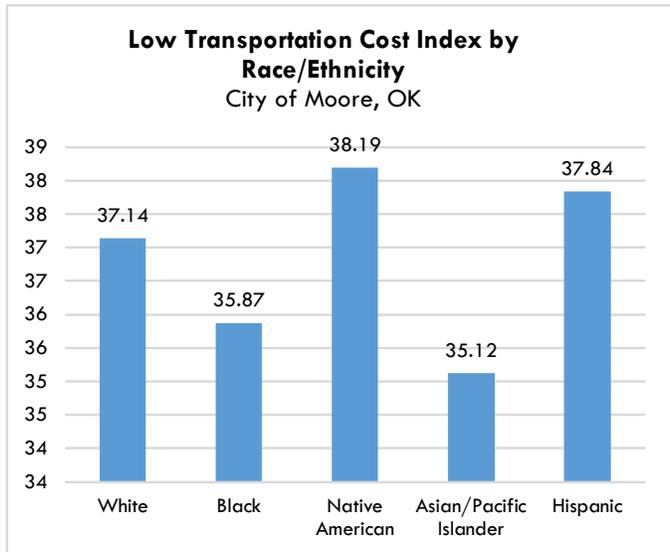
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[3] City of Moore, OK website, https://www.cityofmoore.com/community-places/public-transportation

Map 3-10
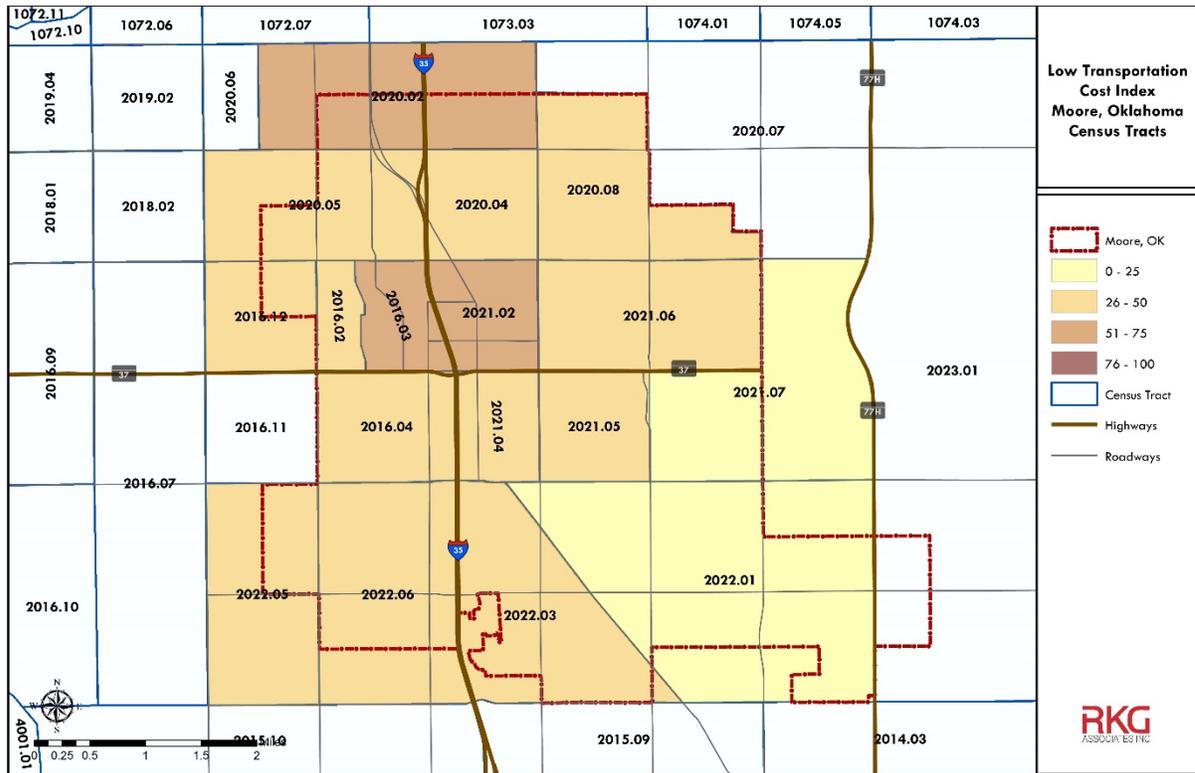
M.   ENVIRONMENTAL HEALTH INDEX

HUD also measures the environmental quality of neighborhoods with the Environmental Health Index. The index measures the exposure to toxins harmful to human health at a neighborhood level. It is based on the U.S. Environmental Protection Agency (EPA) estimates of the air quality by neighborhood, and only measures issues related to air quality and no other factors impacting environmental health. The Environmental Health Index has values ranging from 0 to 100, with higher scores representing less exposure to harmful toxins, and therefore, better environmental quality of a neighborhood.

The Asian/Pacific Islander population in Moore resides in neighborhoods with the best environment quality compared to other racial/ethnic groups in the City, with the highest score of 47.9. The Native American population has the lowest Environmental Health Index score of 44.2, followed by the Hispanic population with a slightly higher score of 44.7. This indicates that these two groups usually reside in neighborhoods with more exposure to harmful toxins in the air (Figure 3-12).

The environmental health across the City varies geographically, but in general the index value ranges from 25 (Census Tract 2016.04) to 57 (Census Tract 2022.01), indicating low to medium environmental health for the City. The pattern of geographic difference of the Environmental Health Index in Moore is like some of the previous indices discussed, as the east side and the southwestern corner of the City have better environmental quality. In contrast, people living in the northwest side and neighborhoods along Highway 37 generally have less access to most opportunities and lower environmental quality with the City (Map 3-11). The biggest environmental factor in most communities is automobile emissions, which are highest where in areas where there are high traffic volumes and congestions. Areas near Interstate 35 and around Moore's employment base indicate worst environmental conditions in that area.

Figure 3-12

Environmental Health Index by Race/Ethnicity
City of Moore, OK
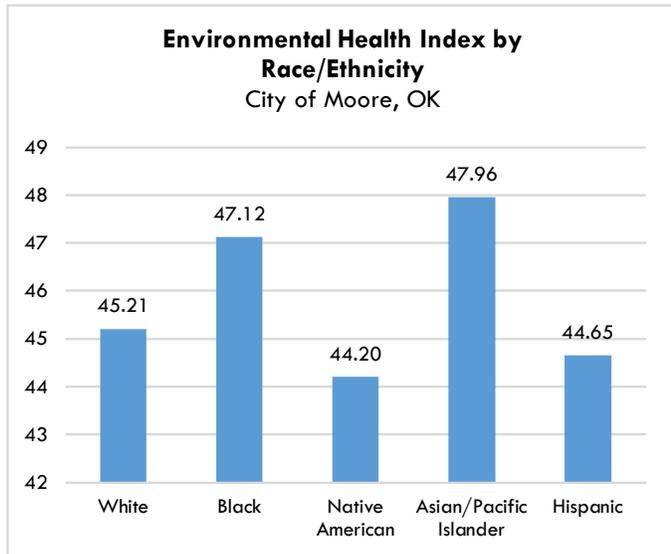
Source: HUD AFFH Data Version AFFHT0004a and RKG Associates, Inc., 2020

Map 3-11
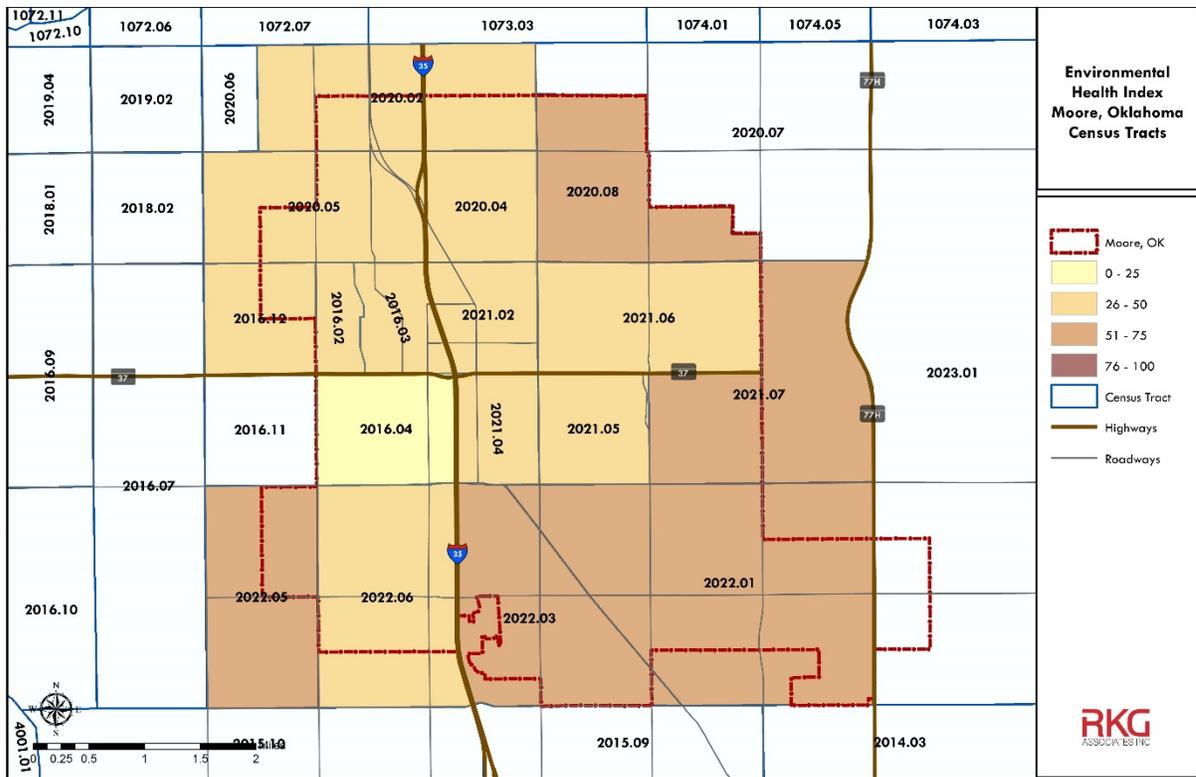
N.   HOUSING TENURE

The HUD AFFH system utilizes CHAS 2009-2013 data to analyze the housing conditions and problems in neighborhoods. One indicator to examine the existing housing stability in the City of Moore is the homeownership rate by racial/ethnic groups. As purchasing a home is the biggest investment most people will make in their lifetime, when property values appreciate, homeowners can accumulate asset value and household wealth at the same time. Therefore, a higher homeownership rate is usually associated with more household wealth and stability. Historically, minority racial groups tend to have lower homeownership rates than white households in the U.S.

However, this is not necessarily the case in Moore. The Asian/Pacific Island population in the City has the highest homeownership of 83.8% among all racial/ethnic groups, followed by the White population, with a homeownership rate of 74.7%. Both groups are higher than the citywide average of 73.6%. In comparison, the Black population, the Native American population, people of Other Races, and the Hispanic population all have homeownership rates lower than the City average. The Black population has the lowest homeownership rate of 62% compared to other groups, which is over 20 percentage points lower than the rate of the Asian/Pacific Islander population (Figure 3-13).

Figure 3-13
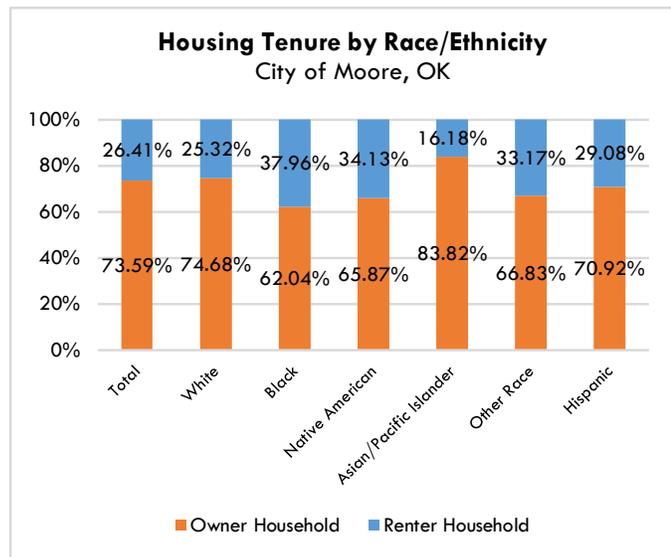
Source: HUD AFFH Data Version AFFHT0004a and RKG Associates, Inc., 2020

There is also a geographic disparity of homeownership rates across different neighborhoods in Moore. In general, neighborhoods on the east, southeast, and the southwest sides of the City have the highest proportion of owner households, which is over 80%. However, neighborhoods west to the Old Town and in the south along I-35 have below 50% of owner households, which is the lowest compared to other parts of the City. Correspondingly, these pockets of neighborhoods along I-35 are also characterized by proportionally more renter households within their housing stock (Map 3-12).

Map 3-12
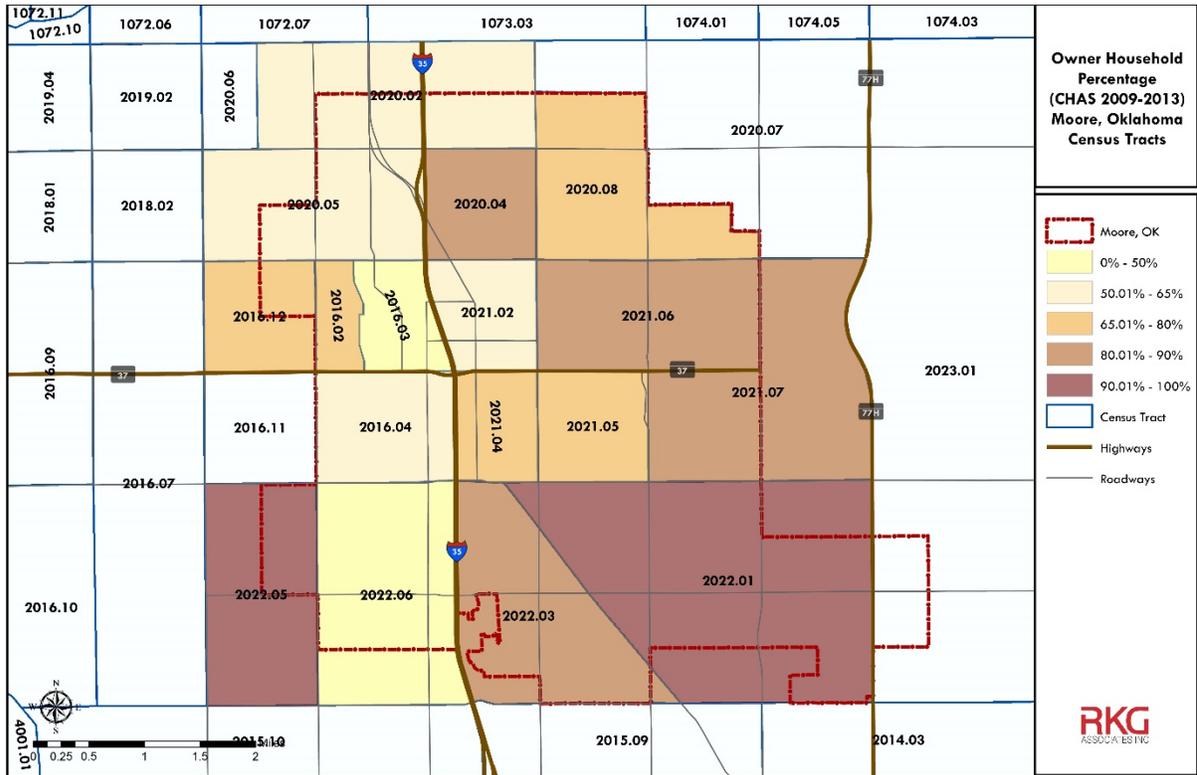
O.   LOCATION OF AFFORDABLE RENTAL HOUSING

The amount of affordable rental housing units within a city is an important indicator of the availability of fair housing choice options. According to the HUD AFFH data, among the 6,750 rental units in Moore, 24.64%, or 1,663 units of them are affordable units (Table 3-10).

Table 3-10
Affordable Rental Units (CHAS, 2009-2013)
City of Moore, Oklahoma

	Count	Percent
Total Renter Units	**6,750**	**100.00%**
Total Affordable Renter Units	1,663	24.64%

Source: HUD AFFH Data Version AFFHT0004a and RKG Associates, Inc., 2020

Neighborhoods in and around the Old Town area along I-35, as well as in the south of the City east to I-35 have between 40% to 60% of rental units that are affordable, which is the highest concentration compared to the rest of the City (Map 3-13). In comparison, neighborhoods on the north, the east, and the southwest sides of Moore have merely below 15% of their rental housing units that are affordable, which is the lowest across the City.

Map 3-13
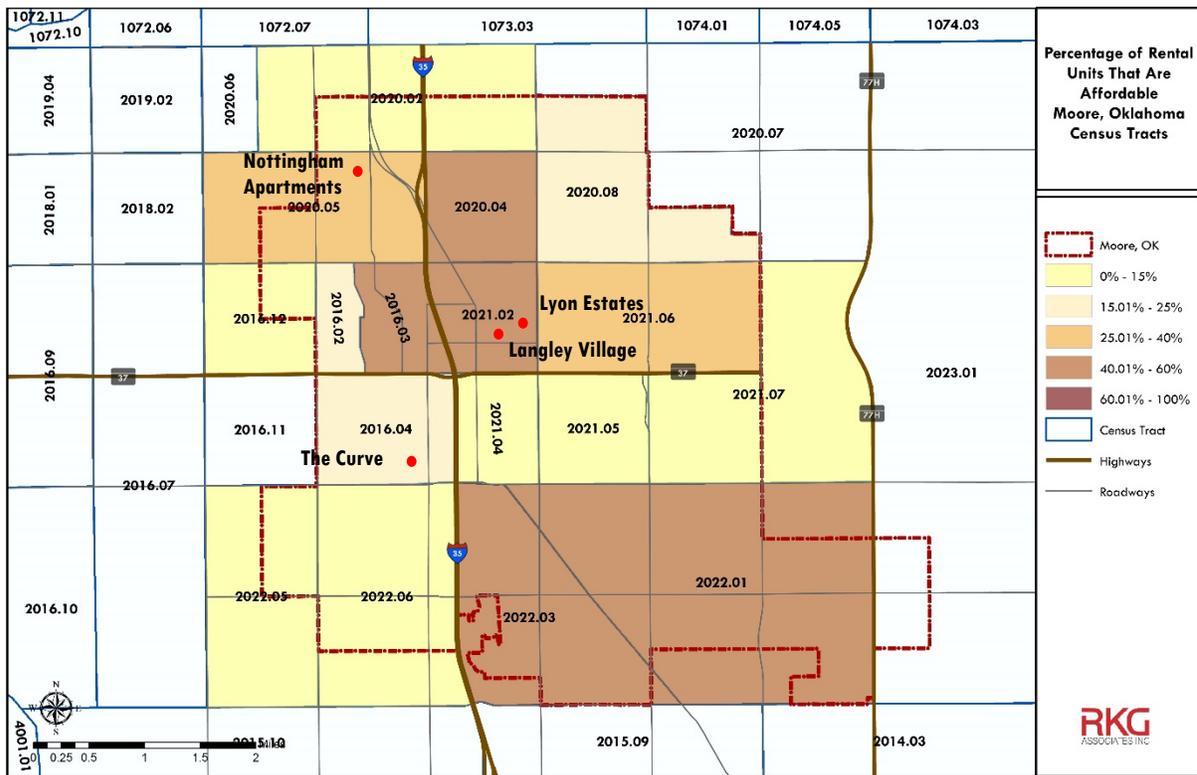
P.   PUBLICLY SUPPORTED HOUSING AND RACE/ETHNICITY

Moore does not have a public housing authority, and therefore, there are no publicly owned and managed housing units in the City. However, the City has 299 project-based affordable housing units, which include part of the 202 active Section 8 Voucher rental households, which are under the administration of the Oklahoma Housing Finance Agency (OHFA). There is also one Section 8 homeownership household, and one person is labeled as disabled and there is no elderly family member in this 3-bedroom homeownership household. The 202 Section 8 Voucher rental households are detailed in Table 3-11.

The table shows that 63.4% of the Section 8 Voucher households live in 2-bedroom or 3-bedroom units, and over half (55.9%) of all the households have family members with disabilities. There are also over 10% of Section 8 households have elderly family members at or over 62 years old. RKG reached out to OHFA requesting the exact locations of the Section 8 Voucher households, but due to privacy issues, OHFA was not able to disclose such information.

Table 3-11
Active Section 8 Voucher Households, 2020
City of Moore, Oklahoma

Bedroom Type	Active Voucher Households	
	Number	Percent
Total	**202**	**100.00%**
0-Bedroom/Studio	0	0.00%
1-Bedroom	34	16.83%
2-Bedroom	55	27.23%
3-Bedroom	73	36.14%
4-Bedroom	34	16.83%
5+-Bedroom	6	2.97%
Households with Family Members with Disability	**113**	**55.94%**
Households with Eldery Family Members (Aged >= 62)	**21**	**10.40%**

Source: Oklahoma Housing Finance Agency and RKG Associates, Inc., 2020

The rest of the affordable housing units are in the project-based, rent-subsidized private affordable housing developments, including Lyon Estates, Langley Village, and Nottingham Apartments. The City also has a new affordable housing development project in the pipeline which is partially funded by the Community Development Block Grant-Disaster Recovery (CDBG-DR) funds that Moore received from HUD. This upcoming mixed-income, mixed-use development named "The Curve" is located at SW 17th and Janeway Avenue. There will be 244 units in total, including 219 affordable units and 25 market rate units.

Subsidized Housing Complexes:

- **Lyon Estates (92 market rate and affordable units)**
  215 N Eastern Ave, Moore, OK
  Lyons Estates was built in part with financing obtained through the Low-Income Housing Tax Credit (LIHTC) program. In addition to providing apartments for low-income households, this property includes some market rate units. Households earning 60% or less of the Area Median Income (AMI) qualify for targeted rental units in LIHTC financed housing. This property may also designate units for renters with even lower incomes, from 60% of AMI down to 30% AMI.

- **Langley Village I & II (51 1-bedroom units/Section 202 Supportive Housing for the Elderly)**
  300 N Turner Ave, Moore, OK
  Langley Village Apartments is an affordable rental housing community located in Moore, OK. Langley Village Apartments is a Senior affordable housing community with 1 Bedroom apartments units. Since the property was built using funding from HUD's Section 202 Supportive Housing for the Elderly program, residency is typically restricted to households earning 50% of the Area Median Income (AMI) or less with at least one member age 62 years or older.

- **Nottingham Square Apartments**
  2444 N Nottingham Way, Moore, OK
  Nottingham Square Apartments is an older apartment complex built in 1975 that provides family apartments for lower income households. The project was developed with the use of Low-Income Housing Tax Credits and has 1-, 2- and 3-bedroom units.

- **The Curve (244 units, 219 affordable and 25 market rate)**
  Southwest 17 & Janeway Avenue, Moore, OK
  The City received Community Development Block Grant-Disaster Recovery (CDBG-DR) funds from the Department of Housing and Urban Development (HUD) in response to the May 20, 2013 EF5 tornado that destroyed 1,150 homes and killed 24 people.

  A portion of this grant is being used to fund The Curve, a mixed-income, mixed-use development. The Curve will be located at SW 17th and Janeway Avenue, where the Royal Park Mobile Home community once stood.

THE CURVE: SITE PLAN
MOORE, OK

BGO ARCHITECTS

Following the storm, City of Moore purchased the 14-acre property to prepare it for redevelopment. Once completed, it will include three buildings, one of which will be mixed use with roughly 4,800 SF of commercial uses. The total development cost will be $49.7 million, which includes a $15.9 million subsidy provided by HUD CDBG-Disaster Relief funds and a $19 million loan from Freddie Mac. The Curve development will be one of the final projects that will be funded by CDBG-DR for the City of Moore. It is also the biggest project the City will complete with this grant. The City first purchased the land in 2015 and has since completed demolition, utility installation, and a masterplan for the project. Development of the masterplan included several public meetings and workshops that gathered citizen input from across the Moore community.[4] The locations of the publicly supported housing units generally match the areas previously identified with lower levels of labor market engagement, lower school proficiency, and higher poverty exposure (Map 3-14).

Q.   HOUSING PROBLEM

Analyzing housing problems highlights areas where deferred maintenance has resulted in condition problems and eroded the housing stock. The HUD AFFH data indicates that 4,865 households have one or more housing problems, accounting for 25.4% of the total households in Moore. Proportionally, more households of Hispanics (41.8%) and Other Races (41.8%) are experiencing greater housing problems compared to the other racial/ethnic groups in the City (Table 3-12).

Table 3-12
Households with One or More Housing Problems
City of Moore, Oklahoma

	Total Households	Households with One or More Housing Problems	
		Count	Percent
Total	**19,180**	**4,865**	**25.36%**
White	16,310	3,950	24.23%
Black	685	240	35.04%
Native American	835	150	17.96%
Asian/Pacific Islander	340	105	30.52%
Other Race	1,010	420	41.83%
Hispanic	1,530	635	41.80%

Source: HUD AFFH Data Version AFFHT0004a and RKG Associates, Inc., 2020

The concentration of households with one or more housing problems also varies geographically. When compared to the previous map, Map 3-15 shows that areas with the highest percentages of households experiencing one or more housing problems cluster around publicly-supported housing programs and Section 8 Voucher units in Moore, with these neighborhoods seeing over 30% of their households having housing problems. These neighborhoods also have higher exposure to poverty and lower levels of labor market engagement, as displayed in previous maps. Census Tract 2020.05 also has a concentration of the Hispanic population, as previously discussed.

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[4] City of Moore, OK website: https://www.cityofmoore.com/departments/grants-programs/the-curve

Table 3-12

Publicly-Supported Housing And Race/ Ethnicity
Moore, Oklahoma
Census Tracts
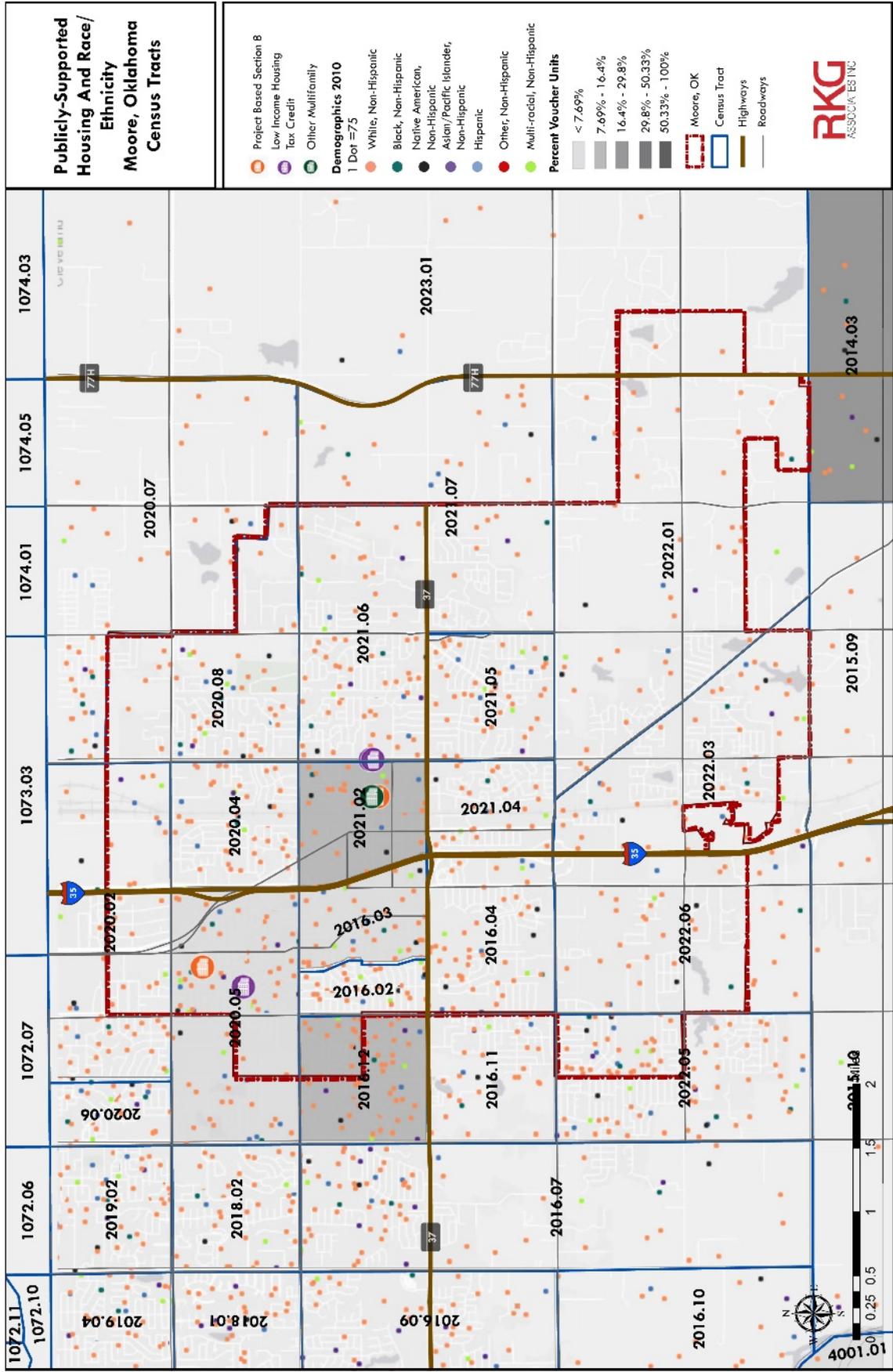
Map 3-15
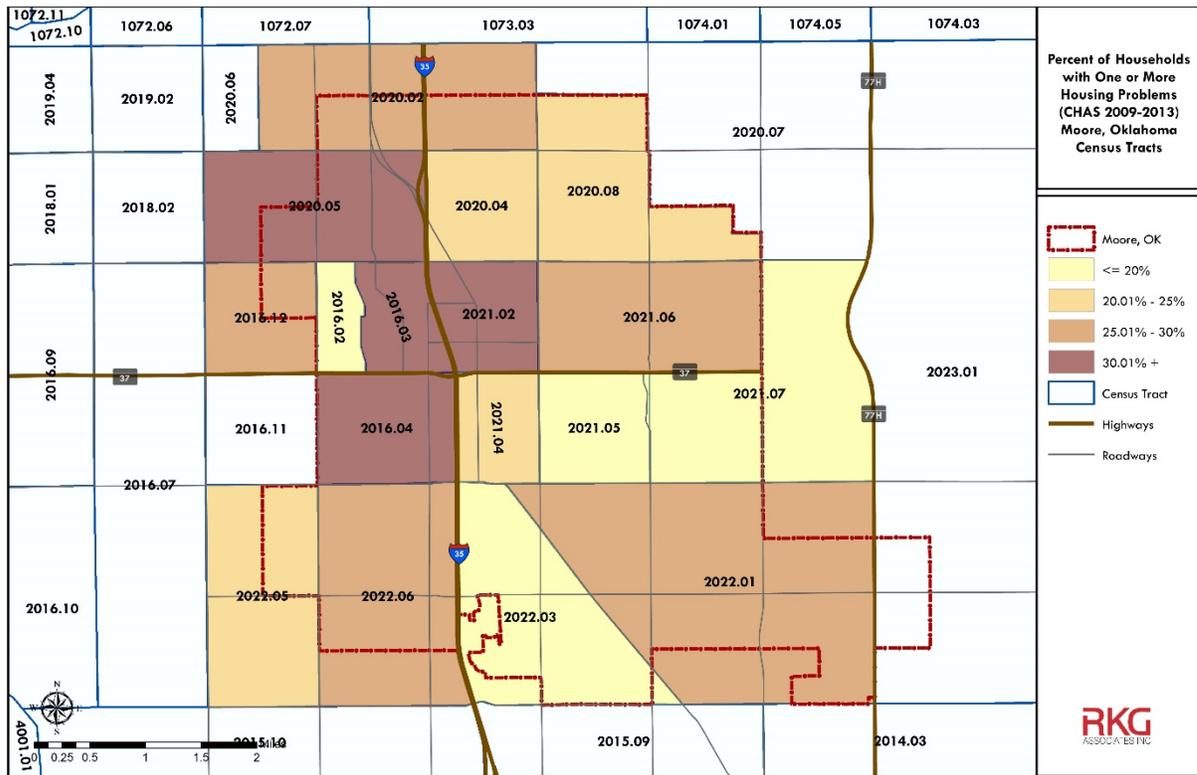
R.   TOTAL INDEX SCORE

In order to measure and evaluate the combined performance of all racial and ethnic groups in each census tract combining all the previously presented demographic, housing and fair housing indexes, RKG converted the value of seven indicators into index scores that align with the HUD AFFH indexes (e.g. the Low Poverty Index) in scale and range. The seven indicators that were converted by RKG include:

Converted Indicators
- 2019 median household income
- 2019-2024 average annual percent change of median household income
- percentage of the minority population
- percentage of people with disability
- percentage of owner-occupied housing units
- percentage of rental units that are affordable
- percentage of housing units with one or more housing problems

HUD AFFH Indexes
- Low Poverty Index
- School Proficiency Index
- Job Proximity Index
- Labor Market Engagement Index

- Transit Trip Index
- Low Transportation Cost Index
- Environmental Health Index

The consultant identified the highest average index values for all census tracts for each indicator and assigned it the highest index score. Then all other census tract values were converted to index scores as a percentage of the highest index value. In two instances (percentage of people with disability and percentage of housing units with one or more housing problems), the consultant assigned the highest index score to the lowest indicator value to reflect the actual meaning of the indicator. For example, the census tract with the lowest percentage of its population having a disability is considered to face fewer fair housing challenges compared to other census tracts, and this is reflected with the highest index score. As such, the higher the census tract's index score, the better its conditions were relative to the performance indicators.

The seventeen census tracts were then ranked based on their total scores, and the results (the lowest total score was ranked as 1, and the highest was ranked as 17) were then mapped in ArcGIS. The darker shading reflects a higher ranking and better fair housing opportunities, while lighter shades indicate that the census tracts face more fair housing challenges (Map 3-16). Readers should note that this is not an absolute measurement of the fair housing opportunities across the neighborhoods as the index score conversion is only an approximation aiming to bring all indicators into a comparable scale based on currently available data. Rather, this analysis provides readers with insights into the geographic concentration of fair housing issues across Moore, and opportunities to start to identify neighborhoods that need additional resources to increase their fair housing availability.

The analysis indicates that the best conditions exist in the east and southeastern census tracts, south of 19th Street and east of Bryant Avenue. The most challenged census trac is 2016.04, which is where the EF 5 tornado destroyed the 1,150 housing units and killed 24 people in 2013. RKG suspects the data used for this analysis does not accurately reflect the positive changes that have occurred since 2013 but should be available for the 2025 Analysis of Impediments.

Map 3-16
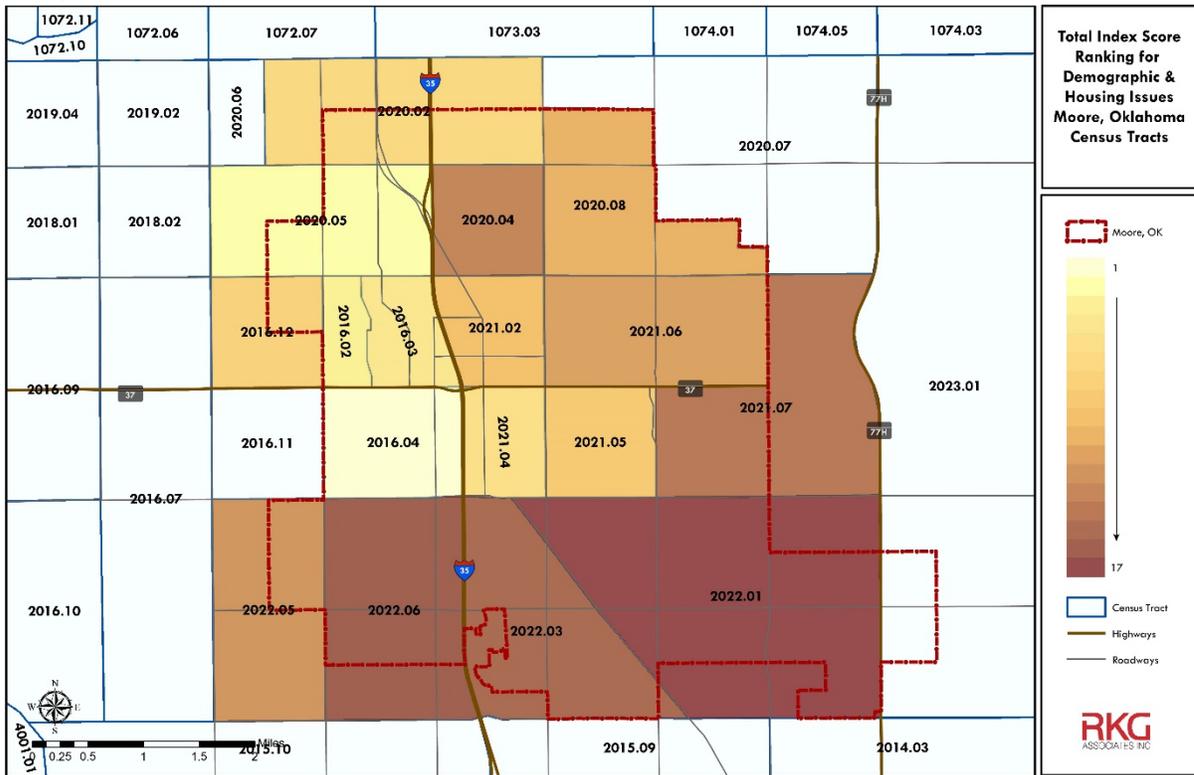
4 RECORD OF HOUSING DISCRIMINATION

A.   INTRODUCTION

This section examined the records of housing discrimination complaints originated in the City of Moore to analyze the types of existing fair housing issues. The Federal Fair Housing Act (FHA) of 1968, as amended in 1974 and 1988, prohibits housing discrimination based on race, color, religion, national origin, sex, disability, and familial status. Alleged violations of the FHA may be filed with:

- Metropolitan Fair Housing Council (MFHC)
- HUD Office of Fair Housing and Equal Opportunity (FHEO)
- Office of the State Attorney General

Based on the communication between RKG and Moore's HUD Office of Fair Housing and Equal Opportunity, fair housing complaints within Moore are now under the administration of the U.S. Department of HUD, Region VI Office in Fort Worth, Texas. Therefore, RKG reached out to HUD's Fort Worth office to obtain the records of complaints filed with HUD.

B.   METROPOLITAN FAIR HOUSING COUNCIL (MFHC)

The Metropolitan Fair Housing Council of Oklahoma, Inc. (MFHC) is the only HUD-qualified full-service fair housing enforcement, advocacy and educational private non-profit organization in Oklahoma, and it has representational standing and organizational standing to file fair housing claims to HUD, Department of Justice (DOJ), and local, state and federal courts.

Since 1979, MFHC conducts fair housing counseling, investigation and testing, complaint referral to HUD, fair housing/fair lending education, outreach training, and mediation services, including legal referral by MFHC's staff attorney or a cooperating attorney. The City of Moore has currently contracted the MFHC under CDBG funds to conduct fair housing enforcement, fair housing education and outreach in its jurisdictional area.

According to MFHC, they generally process an average of 850 to 900 complaint intakes per year from throughout the State of Oklahoma. Most complaints are resolved with fair housing counseling and education by MFHC staff about rights and remedies under federal and state laws. Complaints not resolved by initial or secondary counseling will be referred, if applicable, for in-house mediation, a Requests for Reasonable Accommodation or Reasonable Modification (RA/RM), further testing and investigations, complaint filing with HUD FHEO, or legal remedy by MFHC staff attorney or cooperating attorney.

Table 4-1

Metropolitan Fair Housing Council of Oklahoma, Inc. Fair Housing Complaints by Issue (2015-2019)
City of Moore, OK

	Total		10/2015 - 9/2016	10/2016 - 9/2017	10/2017 - 9/2018	10/2018 - 9/2019
	Number	Percent				
Race or Color	1	1.59%	1	0	0	0
National Origin	0	0.00%	0	0	0	0
Religion	0	0.00%	0	0	0	0
Sex	0	0.00%	0	0	0	0
Familial Status	13	20.63%	2	5	5	1
Disability	21	33.33%	7	5	4	5
Age	0	0.00%	0	0	0	0
Marital Status	0	0.00%	0	0	0	0
Income Source (Section 8, etc.)	1	1.59%	0	1	0	0
Renter's Rights, Landlord/Tenant & Other	27	42.86%	5	6	8	8
Total	**63**	**100.00%**	**15**	**17**	**17**	**14**

Source: Metropolitan Fair Housing Council of Oklahoma, 2020

Records of complaint intakes received by MFHC between October 1st, 2015 and September 30th, 2019 from City of Moore indicate that among the total of 63 complaint records, the most common issues were about "Renter's Rights, Landlord/Tenant, and Other" issues, accounting for 42.9%. Intakes of Disability issues were the second most common, constituting 33.3%, followed by Familial Status, with a percentage of 20.6%. There was one intake for Race or Color related issues, and one for Income Source issues, accounting for 1.6% respectively (Table 4-1/Figure 4-1).

Typical renter's rights complaints deal with the legal rights and responsibilities between landlords and tenants and there are laws that govern those interactions. Complaints regarding

Figure 4-1

Source: Metropolitan Fair Housing Council of Oklahoma, 2020

disabilities deal with a different set of issues. For people that have a physical or mental disability (including hearing, mobility and visual impairments, chronic alcoholism, chronic mental illness, AIDS, AIDS Related Complex and mental retardation) that substantially limits one or more major life activities, landlords may not refuse to let a tenant make reasonable modifications to the dwelling or common use areas, at the tenant's expense so the disabled person can use the housing. Where reasonable, the landlord may permit changes only if the tenant agrees to restore the property to its original condition when their period of tenancy has ended. Landlords cannot refuse to make reasonable accommodations in rules, policies, practices, or services, if necessary, for the disabled person to use the housing.

Regarding family status-related complaints, unless a building or community qualifies as housing for older persons, it may not discriminate based on familial status. That is, it may not discriminate against families in which one or more children under 18 live with: (1) a parent, (2) a person who has legal custody of the child or children, or (3) the designee of the parent or legal custodian, with the parent or custodian's written permission.
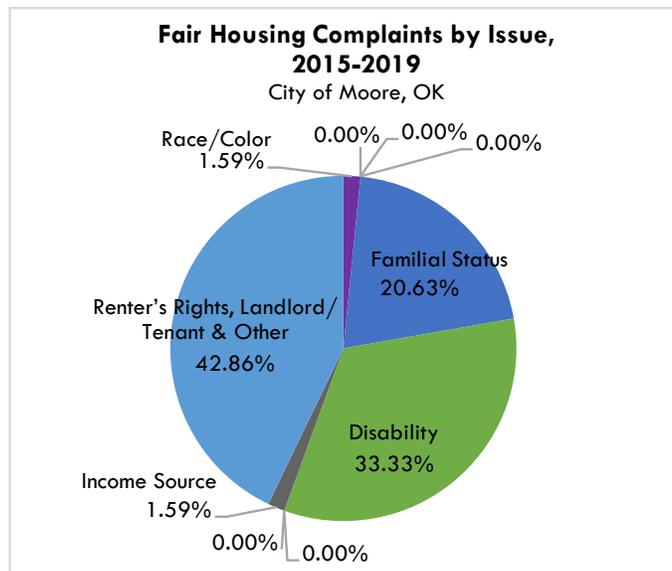
Familial status protection also applies to pregnant women and anyone securing legal custody of a child under 18.[1]

C.   U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD)

The Office of Fair Housing and Equal Opportunity (FHEO) at HUD receives formal complaints regarding alleged violations of the FHA filed by individuals or organizations such as MFHC on behalf of the individuals. Fair housing complaints originating in Moore were obtained and analyzed for the period starting from 2015 through 2019. A total of eight complaints were filed with and received by HUD's Fort Worth Region VI Office, including two filed by MFHC. All complaints were related to Disability issues.

D.   OFFICE OF THE STATE ATTORNEY GENERAL

The Office of Civil Rights Enforcement (OCRE) is a division of the Attorney General's Office of Oklahoma and is responsible for enforcing the Anti-Discrimination Act, which prohibits discrimination in employment, housing, and public accommodation, as well as enforcing other civil rights related laws. The OCRE took over investigating fair housing complaints from the Oklahoma Human Rights Commission in July 2012. The Attorney General's Office did not respond to RKG's request for housing discrimination complaint records in March 2020, although this is likely due to the absence of complaints filed with OCRE.

E.   SUMMARY OF FAIR HOUSING COMPLAINTS

An analysis of the combined complaint records from both HUD and MFHC indicates no evidence of a substantial increase or decrease in fair housing discrimination complaints generated in Moore between October 2015 and September 2019 (Figure 4-2). "Renter's Rights, Landlord/Tenant and Other" issues, as well as Disability related issues, were both the most common basis for complaints, with 27 complaints originated accounting for 39.1%, respectively, of all intakes and filings received by both HUD and MFHC. Familial Status accounts for 18.8%, followed by Race or Color and Income Source complaints, representing 1.5% of all cases, respectively.

Figure 4-2
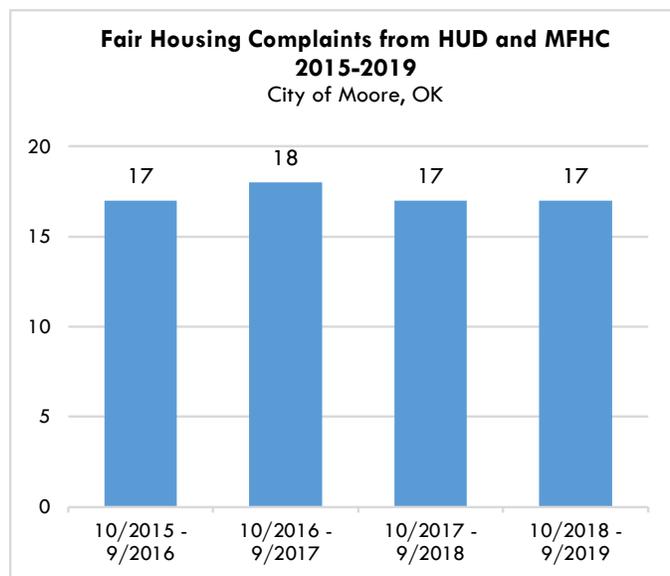
Source: Metropolitan Fair Housing Council of Oklahoma, 2020

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[1] LegalAidOK website: https://oklaw.org/resource/fair-housing-its-your-right-1

5 REVIEW OF PUBLIC SECTOR POLICIES

A. INTRODUCTION

Public policies set the direction for a city's socioeconomic prospects and priorities in practice. They influence numerous facets of residents' life and establish principles to distribute resources. Policies, practices or procedures that appear neutral when taken at face value, may actually deny or adversely affect the provision of housing to persons of a particular race, color, religion, sex, disability, familial status, or national origin and create an impediments to fair housing choice.

An element of the Analysis of Impediments to Fair Housing Choice includes an examination of a city's policies in terms of their impact on housing choice. This section evaluates and compares the current City policies to those in the 2015 Analysis of Impediments to Fair Housing Choice to determine opportunities for accelerating the expansion of fair housing choice.

B. POLICIES GOVERNING INVESTMENT OF FUNDS FOR HOUSING AND COMMUNITY DEVELOPMENT

An examination of the City's current budget is essential for understanding how the financial resources in support of fair housing choice have increased or declined since the 2015 Analysis. The City of Moore receives federal entitlement funds directly and indirectly from HUD in the form of Community Development Block Grants (CDBG). The primary objective of this program is to develop viable urban communities by providing decent housing, a suitable living environment, and economic opportunities, principally for persons of low- and moderate-income levels. Funds can be used for a variety of activities, including construction or rehabilitation of public facilities and infrastructure, public services, housing rehabilitation, homeownership assistance, lead-based paint detection and removal, removal of architectural barriers, rehabilitation of commercial or industrial buildings, and loans or grants to businesses.

1. Project Funding Criteria

Funding allocations follow the principle of meeting high priority needs across Moore for projects primarily benefiting low- and moderate-income residents. The assignment of funding priorities is based on meeting the statutory requirements of the CDBG program, input from members of housing and community services, public meetings and public hearings. Every five years, the City of Moore Department of Community Development is required to prepare a 5-year Consolidated Plan as a federal funding grantee, which provides guidelines for annual allocations of received funds. For each year included in the Consolidated Plan, the City is also required to prepare an Annual Action Plan, showing how annual entitlement funds will be distributed to meet the overall 5-year goals.

2. Distribution of Funds

Table 5-1 displays how the City utilized the funds by recipient agency or organization, the nature and location of the projects, and the allocated amount over the last five Fiscal Years since the 2015 Analysis of Impediments to Fair Housing Choice.

Table 5-1

Uses of HUD Community Development Block Grant Funds 2015-2019
City of Moore, Oklahoma

FFY 2015 Activities	Description	Amount
City of Moore	Armstrong Addition (Water Line & Streets)	$203,698.30
City of Moore	Administration	$58,676.40
Metropolitan Fair Housing	Public Service	$4,000.00
Crime Stoppers	Public Service	$8,000.00
Among Friends	Public Service	$4,327.30
Moore Youth and Family (School)	Public Service	$8,000.00
Moore Youth and Family (Community)	Public Service	$8,000.00
Bethesda	Public Service	$10,680.00
Aging Services	Public Service	$8,000.00
TOTAL FFY 2015		**$313,382.00**
FFY 2016 Activities	Description	Amount
City of Moore	Crestmoore (Sewer Line)	$198,764.00
City of Moore	Administration	$57,158.00
Metropolitan Fair Housing	Administration-Fair Housing	$4,000.00
Moore Youth and Family (School)	Public Service	$8,000.00
Moore Youth and Family (Community)	Public Service	$8,000.00
Bethesda	Public Service	$10,680.00
Aging Services	Public Service	$19,188.50
TOTAL FFY 2016		**$305,790.50**
FFY 2017 Activities	Description	Amount
City of Moore	Crestmoore (Water) & Regency (Water Line Repairs)	$203,078.00
Metro Fair Housing	Administration-Fair Housing	$4,000.00
City of Moore	Administration	$58,485.00
Aging Services	Public Service	$18,143.00
Bethesda	Public Service	$12,720.00
Moore Youth and Family (Community)	Public Service	$8,000.00
Moore Youth and Family (School)	Public Service	$8,000.00
TOTAL FFY 2017		**$312,426.00**
FFY 2018 Activities	Description	Amount
City of Moore	South Norman & North Norman (Water Line Replacement)	$209,223.00
Central Oklahoma Community Action Agency	Public Service	$2,500.00
Moore Youth and Family (School)	Public Service	$8,000.00
Moore Youth and Family (Community)	Public Service	$8,000.00
Bethesda	Public Service	$9,781.00
Aging Services	Public Service	$20,000.00
General Administration	Administration	$60,375.00
Metropolitan Fair Housing	Administration-Fair Housing	$4,000.00
TOTAL FFY 2018		**$321,879.00**
FFY 2019 Activities	Description	Amount
City of Moore	North Janeway/Gale Sewer Line Replacement	$209,275.00
Central Oklahoma Community Action Agency	Public Service	$2,500.00
Moore Youth and Family (School)	Public Service	$8,000.00
Moore Youth and Family (Community)	Public Service	$8,000.00
Bethesda	Public Service	$9,793.00
Aging Services	Public Service	$20,000.00
Metropolitan Fair Housing	Administration-Fair Housing	$5,500.00
City of Moore	Administration	$58,891.00
TOTAL FFY 2019		**$321,959.00**

Source: City of Moore, OK, 2020

The CDBG Program requires that most activities benefit low- to moderate-income persons, which are defined by HUD as persons with household incomes below 80% of the area median income. Most of the designated projects will directly serve Moore residents who qualified based on their income or other criteria (Housing Programs and Public Service funding). The other infrastructure or neighborhood projects are area benefit activities, or projects located in parts of the City where over half the residents have low or moderate incomes. Projects in other areas of the City are eligible for CDBG funding if they individually benefit low- or moderate-income individuals or persons who meet other HUD criteria including those of a presumed benefit.

The 2015 Analysis of Impediments to Fair Housing Choice concluded that Moore did not fund any programs directly related to affordable housing development, housing rehabilitation or the funding of Community Housing Development Organization (CHDO) activities based on the City's CDBG funding priorities at that time. It also recommended that the City should start to expand its funding priorities to include affordable housing needs.

The City has begun providing annual funding to the Metropolitan Fair Housing Council of Oklahoma (MFHC) from its CDBG allocations. This funding has occurred annually since Fiscal 2015. Currently, MFHC is the only HUD-qualified full-service private nonprofit fair housing enforcement and advocacy organization in Oklahoma. The annual allocation also increased from $4,000 between Fiscal Years 2015 and 2018 to $5,500 in Fiscal Year 2019. The City's annual CDBG allocation to the Metropolitan Fair Housing Council of Oklahoma is helping to further fair housing choice in Moore. However, the CDBG funds that MFHC receives only accounts for less than 2% of the total allocation each year between Fiscal Years 2015 through 2019. Some addition funds support Central Oklahoma Community Action and Aging Services, which provide direct benefits to low- and moderate-income households. However, it is recommended that the City increase its annual allocation to the Metropolitan Fair Housing Council of Oklahoma, as well as other community-based private nonprofit organizations related to affordable housing development into its funding priorities.

Historically, the City has spent the majority (65%) of its CDBG funds over the past five years on infrastructure projects such as water and sewer line improvements. While such projects can be CDBG-eligible when they are benefiting low- and moderate-income neighborhoods, they are an indirect benefit, unless they are facilitating the construction of decent, safe, and affordable housing or some other project. This is a municipal infrastructure need that can be financed through other sources (e.g., general fund or enterprise fund). There are many more opportunities for the City to redirect their CDBG funds to affordable housing-related activities and those should be explored over the next five years.   There still is no local nonprofit development corporation or affordable housing provider, other than Habitat for Humanity, which builds a limited number of affordable homes each year through donations of materials and labor.

C.   SECTION 8 VOUCHER PROGRAMS

As discussed in the previous chapter of Demographic and Housing Condition Analysis, Moore currently does not have any public housing authority. The Oklahoma Housing Finance Agency (OHFA) is responsible for administering Moore's Section 8 Housing Choice Voucher Program and federal rent subsidy certificates and vouchers awarded by HUD from the Section 8 Housing Choice Voucher Program. Currently, the City has 202 active Section 8 Voucher households and one homeownership household.

The Oklahoma Housing Finance Agency has 248 applicants on the waiting list for the Section 8 Voucher program in Moore. According to the OHFA, applicants that are with a disability or are homeless can be placed on a preferred status with the provision of supporting documentation. These

applicants with the preferred status will be prioritized during the selection process. The average wait time for the Section 8 Voucher program in Cleveland County is 226 days.

The majority (69.8%) of these 248 applicant households have persons in the household that are White and 33.1% have an African American household member. Non-Hispanic households account for the vast majority (93.2%) of the applicants currently on the waiting list. Also, over half (54.44%) of the applicants are households with children, and 23.79% of the total applicants are households with family members with disabilities (Table 5-2).

Table 5-2
Applicants on Section 8 Voucher Progam Waiting List, 2020
City of Moore, Oklahoma

Race/Ethnicity	Current Applicants (Households)	
	Number	Percent
Total	**248**	**100.00%**
White	173	69.76%
Black	82	33.06%
Native American	39	15.73%
Asian/Pacific Islander	10	4.03%
Hispanic	17	6.85%
Non-Hispanic	231	93.15%
Households with Children	**135**	**54.44%**
Households with Family Members with Disability	**59**	**23.79%**
Single-Person Households	**85**	**34.27%**

Source: Oklahoma Housing Finance Agency and RKG Associates, Inc., 2020

D.   LAND USE, COMPREHENSIVE PLANNING, AND ZONING REGULATIONS

The City of Moore updated its previous Comprehensive Plan and adopted the Envision Moore Plan 2040 Comprehensive Plan in May 2017. The Plan envisions Moore's future and needs into the year 2040. The Envision Moore Plan 2040 recognizes that affordable housing remains one of Moore's existing concerns. It also recognizes that the City needs more housing options, especially mixed-use and multi-family housing which are largely missing from the Old Town neighborhood, which is echoed by the City's 2019 Old Town Moore Revitalization Plan and Parking Analysis.

The new Comprehensive Plan has established "Promote A Variety Of Quality, Affordable Housing Options" as one of its goals, and recognizes that multi-family residential areas (consist of apartments and condos) "provide a housing option for various segments of the population." The Plan further emphasizes the need to provide access to more housing options by stating that the current housing stock in Moore, which mostly consists of single-family homes, "limits options for those that prefer other housing types and for those that choose to rent." Also, the Plan recognizes that "there is a need to support and encourage higher-density housing options for both young professionals and empty nesters."

Below are the policies laid out by The Envision Moore Plan 2040 to promote the access to fair housing options in the City:

- Accommodate a mix of housing types in future land use plan, in appropriate areas;
- Partner with other agencies and organizations to fulfill the housing needs of neighborhoods;
- Encourage master-planned large (more than 20 units) multi-family projects using Planned Unit Development zoning.

The Envision Moore Plan 2040 has also proposed implementation plans to advance the provision of various quality affordable housing in the City:

- Revise Home Occupation regulations to ensure compatibility with residential land use;
- Consider the creation of a Neighborhood Conservation District Overlay zoning district;

- Allow pocket neighborhoods and senior-friendly housing in locations with access to parks, shopping or other amenities;
- Revise code to allow accessory dwelling units in certain zoning districts under specified conditions;
- Identify barriers to affordable housing.

Moore's current zoning ordinance provides an option for mixed-use zoning to allow residential and commercial uses in the same development or structure. The mixed-use zoning creates higher densities and allows for more housing choices, the importance of which is emphasized in the Envision Moore Plan 2040 as previously discussed.

E.   PROPERTY TAXES AND HOUSING AFFORDABILITY

According to the Cleveland County Assessor's Office, there are five types of property tax exemptions and credit programs available in Moore based on property owners' ownership, income, age, disability, and veteran status. These include Homestead Exemption, Additional Homestead Exemption, Senior Valuation Freeze, State of Oklahoma Property Tax Credit/Refund Program, and 100% Disabled Veterans Exemption, which advance the housing affordability especially for low-income, senior, disabled and veteran homeowners.

The Homestead Exemption is available to all Cleveland County homeowners who reside in their properties on January 1 and whose deeds were executed on or before January 1 and filed with the County Clerk's Office on or before February 1. It allows for the exemption of $1,000 in the property assessed valuation. The Additional Homestead Exemption provides an additional $1,000 assessment exemption on top of the Homestead Exemption for homeowners whose gross household incomes from all sources did not exceed $20,000 for the past calendar year. The prerequisite of the Additional Homestead Exemption is that applicants must first qualify for the Homestead Exemption.

The Senior Valuation Freeze benefits homeowner households whose head-of-household (must be an owner-occupant of the Homestead property on January 1, 2017) must be age 65 or older before January 1, 2017. The gross household income derived from the HUD cannot exceed $64,400 for the preceding calendar year.

Any resident of Oklahoma during the previous year who is 65 or older or totally disabled, and whose gross household income does not exceed $12,000 is qualified for the State of Oklahoma Property Tax Credit/Refund Program.

The 100% Disabled Veterans Exemption provides the exemption from property tax for 100% disabled veterans. The Oklahoma Department of Veterans Affairs (ODVA) would send out letters to every veteran qualified for this tax break.

F.   COMMUNICATION AND OUTREACH

The Metropolitan Fair Housing Council of Oklahoma (MFHC) is the only organization that is engaged in the communication and outreach efforts related to housing issues in Oklahoma, including Moore. MFHC is still contracted by the City of Moore to conduct fair housing education and outreach activities on behalf of the City since the 2015 AI.

MFHC's services include:

- Homebuyer education classes (English and Spanish) for first-time homebuyers on credit stability, lending, financing, and insurance processes, preventing predatory lending, loss mitigation, and foreclosure prevention;
- Fair housing counseling and advocacy for persons who have limited English proficiency (LEP) or have Spanish as a first language;
- Fair housing training for consumers, advocates, faith-based organizations, public and private organizations as well as the housing industry on rights and remedies under fair housing laws;
- Fair housing laws and litigation training for MFHC Cooperating Attorneys, public and private attorneys involved in civil rights, consumers, advocates and agencies involved in compliance with the Civil Rights Act of 1964, Civil Rights Act of 1968 (1988 Amendments) and other federal laws and executive orders if the agency is a recipient of federal funds;
- Fair housing education material publication and distribution.

G. PUBLIC TRANSPORTATION

As previously mentioned, Moore currently does not provide citywide public transit services. This has remained a challenge for Moore's residents to access fair housing choice and other socioeconomic resources since this issue was identified in the 2015 Analysis of Impediments to Fair Housing Choice. Alternative public transportation options aiming to serve qualified senior residents, people with medical needs and persons with disabilities in Moore include EMBARK, The Brand Senior Center, SoonerRide, and Share-A-Fare.

EMBARK, which is the public transit authority serving the Oklahoma City Metropolitan Area, partners with community organizations to provide transportation arrangements to meet the needs of qualified citizens aged 60 and older who live in the service area. The Brand Senior Center offers an appointment-based program to provide transportation within Moore's city limits to the citizens of Moore who are 55 or older. A transportation bus owned and operated by the Moore Council on Aging (MCOA) provides rides for senior citizens from their addresses within Moore to the Brand Center or banks, stores, the library, doctor's offices, and other places within the City. SoonerRide is a non-emergency transportation service program to transport Moore's residents to and from their SoonerCare appointments and medically necessary services covered by SoonerCare, which is the Oklahoma Medicaid program. Share-A-Fare provides a 40 percent discount on taxi fares for senior adults and persons with disabilities who live in a participating area.

According to the City, The Regional Transit Authority of Central Oklahoma was formed in early 2019 as a collaborative effort with Oklahoma City, Edmond, Del City, Midwest City, and the City of Norman. The Authority is made up of representatives from each of the five cities, and a regional funding plan for a transit system that aims to connect member cities via the commuter rail and a bus system will be under development. The voting process for the funding plan is estimated to occur in the next two to four years. The Authority envisions a fully metropolitan interconnected system of buses and commuter trains in the next 10 years for the region. The system will include four stops in Norman, two stops in Moore, and expanded urban transportation options in Oklahoma City.

6 *REVIEW OF PRIVATE SECTOR PRACTICES*

A. MORTGAGE APPLICATION TRENDS

RKG Associates performed a review of the practices associated with access to rental housing options and home mortgage lending as part of an assessment of housing market conditions and identifying potential impediments to fair housing choices. The Fair Housing Act prohibits lenders from discriminating against members of the protected classes in granting mortgage loans, providing information on loans, imposing the terms and conditions of loans (such as interest rates and fees), conducting appraisals, and considering whether to purchase loans. The access to fair housing choice requires fair and equal access to the mortgage lending market regardless of race, color, national origin, religion, sex, familial status, disability, or any other statutorily protected basis.

An analysis of the mortgage applications and their outcomes can help the City to identify possible discriminatory lending practices and patterns in a community. The Home Mortgage Disclosure Act (HMDA) was originally enacted by Congress in 1975 and is implemented by Regulation C. It requires many financial institutions to maintain, report, and publicly disclose loan-level information about residential mortgages. Any commercial lending institution that makes five or more home mortgage loans annually must report all residential loan activity to the Federal Reserve Bank, including information on applications denied, withdrawn, or incomplete by race, sex, and income of the applicant. This information is used to determine whether financial institutions are serving the housing needs of their communities.

The latest HMDA data available for the City of Moore is from 2018. This study has included three years of data from 2016 to 2018 for all types of applications received by lenders. This includes applications for all loan purposes (home purchase loans, home improvement loans, and refinancing loans) for all property types (i.e., site-built single-family homes with one to four units, site-built multi-family units with 5 or more units, and manufactured housing units) in Moore. Table 6-1 summarizes all the applications between 2016 and 2018 by application result, loan purpose, loan type, property type and applicant race/ethnicity in Moore.

1. Loan Application Demand

Among the total of 9,430 mortgage applications received between 2016 and 2018, 6,320 (67%) were originated and approved by the lender. Over half (54.3%) the applications received by lenders were for home purchases, followed by home refinancing (33.7%) and home improvements (12.0%). Also, home purchase loan applications had the highest origination rate at 78.8% among all loan purposes, while refinancing loans had the lowest origination rate at 50.7%. Compared to the other two loan purposes, home purchase loans also had the lowest denial rate of 7.1%, while 30.2% of the home improvement loans were denied, which was the highest percentage among the three purposes. Refinancing loan applications were more likely to be withdrawn or were incomplete, at a rate of 20.5%, followed by the home purchase loan applications with a rate of 11.0%. A small portion (around 3% to 4.5%) of all the applications were approved but not accepted.

The most common type of application was for conventional loans, accounting for 58.0% of all loan types. Apart from the only one application for the loan backed by Farm Services Administration or Rural Housing Service (FSA/RHA) which was denied, conventional loans were most likely to be denied

compared to the rest, with the highest denial rate at 18.1%. Conventional loans also had an origination rate of 66.3%, which is lower than the 67.0% average. The second most common type of application was for loans insured by the Federal Housing Administration (FHA) (24.1% among all types), which had the most successful origination rate at 68.6%. Applications for loans backed by the Department of Veteran Affairs (VA) were not very common, constituting 17.9% of all applications, but they had the second most successful origination at a rate of 67.4%, and the lowest denial rate at 12.6%. However, they were more likely to be withdrawn or were incomplete, with a rate of 17.2%.

The vast majority (99.4%) of the applications were for site-built single-family homes with one to four units, accounting for 9,371 out of the 9,430 total applications. There were only 26 applications for site-built multi-family units with five or more units in structure, but they had the most successful origination rate at 92.3%. Applications for manufactured housing units were the least successful, with most of them being either denied, withdrawn or incomplete (Table 6-1).

Table 6-1

Mortgage Application Summary, 2016-2018
City of Moore, Oklahoma

	Total Applications		Originated		Approved Not Accepted		Denied		Withdrawn/Incomplete	
	Count	Percent	Count	Percent	Count	Percent	Count	Percent	Count	Percent
Loan Purpose										
Home Purchase	5,119	54.3%	4,036	78.8%	155	3.0%	366	7.1%	562	11.0%
Home Improvement	1,135	12.0%	675	59.5%	51	4.5%	343	30.2%	66	5.8%
Refinancing	3,176	33.7%	1,609	50.7%	94	3.0%	822	25.9%	651	20.5%
Total	**9,430**	**100.0%**	**6,320**	**67.0%**	**300**	**3.2%**	**1,531**	**16.2%**	**1,279**	**13.6%**
Loan Type										
Conventional	5,466	58.0%	3,622	66.3%	193	3.5%	989	18.1%	662	12.1%
FHA	2,274	24.1%	1,560	68.6%	58	2.6%	329	14.5%	327	14.4%
VA	1,689	17.9%	1,138	67.4%	49	2.9%	212	12.6%	290	17.2%
FSA/RHA	1	0.0%	0	0.0%	0	0.0%	1	100.0%	0	0.0%
Total	**9,430**	**100.0%**	**6,320**	**67.0%**	**300**	**3.2%**	**1,531**	**16.2%**	**1,279**	**13.6%**
Property Type										
Single Family (1-4 Units): Site-Built	9,371	99.4%	6,293	67.2%	298	3.2%	1,511	16.1%	1,269	13.5%
Multifamily Unit (5+ Units): Site-Built	26	0.3%	24	92.3%	0	0.0%	2	7.7%	0	0.0%
Manufactured Housing Unit	33	0.3%	3	9.1%	2	6.1%	18	54.5%	10	30.3%
Total	**9,430**	**100.0%**	**6,320**	**67.0%**	**300**	**3.2%**	**1,531**	**16.2%**	**1,279**	**13.6%**
Applicant Race/Ethnicity										
White	6,787	72.0%	4,596	67.7%	220	3.2%	1,078	15.9%	893	13.2%
Black	380	4.0%	218	57.4%	15	3.9%	77	20.3%	70	18.4%
American Indian/Alaska Native	447	4.7%	276	61.7%	14	3.1%	94	21.0%	63	14.1%
Asian	341	3.6%	221	64.8%	11	3.2%	60	17.6%	49	14.4%
Native Hawaiian/Other Pacific Islander	41	0.4%	24	58.5%	1	2.4%	11	26.8%	5	12.2%
Two or More Races	11	0.1%	6	54.5%	1	9.1%	2	18.2%	2	18.2%
Some Other Race	108	1.1%	85	78.7%	2	1.9%	8	7.4%	13	12.0%
No Data/Not Applicable	1,315	13.9%	894	68.0%	36	2.7%	201	15.3%	184	14.0%
Hispanic or Latino*	646	6.9%	397	61.5%	25	3.9%	134	20.7%	90	13.9%
Total	**9,430**	**100.0%**	**6,320**	**67.0%**	**300**	**3.2%**	**1,531**	**16.2%**	**1,279**	**13.6%**

* Not counted towards the totals

Source: HMDA data and RKG Associates, Inc., 2020

2.   Mortgage Lending Trends by Race/Ethnicity

The racial and ethnic distribution of loan applications between 2016 and 2018 does not align with the 2019 racial and ethnic composition of the population in Moore. While 74.70% of Moore's 2019 population is White, 83.63% of all the applicants between 2016 and 2018 were White. People of All Other Race and the Hispanic population were underrepresented in the mortgage applications between 2016 and 2018, with only 1.47% and 7.86% of the applicants were reported of all other race and Hispanic ethnicity, respectively. However, in comparison, 11.50% and 11.80% of Moore's 2019 population are of All Other Race and are Hispanic, respectively.

Applications from Black applicants and Asian applicants grew by 24.6% and 34.8% in 2018 compared to 2016, while the numbers of applications declined significantly for all loan purposes and other racial and ethnic groups during the same period. The total applications in 2018 reduced by 46.1% compared to 2016 (Table 6-2).

Table 6-2

Loan Applications by Applicant Race/Ethnicity, 2016-2018
City of Moore, Oklahoma

	Total	White	Black	American Indian /Alaska Native	Asian	Native Hawaiian /Other Pacific Islander	Two or More Races	Some Other Race	Hispanic/ Latino*
2016									
Home Purchase	1,796	1,530	61	126	69	10	0	0	153
Home Improvement	522	450	24	26	20	2	0	0	39
Refinancing	1,440	1,209	79	84	60	8	0	0	106
Total	**3,758**	**3,189**	**164**	**236**	**149**	**20**	**0**	**0**	**298**
2017									
Home Purchase	1,527	1,285	63	89	78	12	0	0	133
Home Improvement	428	360	25	24	19	0	0	0	45
Refinancing	1,008	888	42	45	28	5	0	0	82
Total	**2,963**	**2,533**	**130**	**158**	**125**	**17**	**0**	**0**	**260**
2018									
Home Purchase	1,605	1,249	76	72	93	6	8	101	107
Home Improvement	115	84	5	9	10	0	0	7	9
Refinancing	307	261	18	6	10	0	3	9	14
Total	**2,027**	**1,594**	**99**	**87**	**113**	**6**	**11**	**117**	**130**
Total 2016-2018									
Home Purchase	4,928	4,064	200	287	240	28	8	101	393
	56.33%	82.47%	4.06%	5.82%	4.87%	0.57%	0.16%	2.05%	7.97%
Home Improvement	1,065	894	54	59	49	2	0	7	93
	12.17%	83.94%	5.07%	5.54%	4.60%	0.19%	0.00%	0.66%	8.73%
Refinancing	2,755	2,358	139	135	98	13	3	9	202
	31.49%	85.59%	5.05%	4.90%	3.56%	0.47%	0.11%	0.33%	7.33%
Total	8,748	7,316	393	481	387	43	11	117	688
	100.0%	83.63%	4.49%	5.50%	4.42%	0.49%	0.13%	1.34%	7.86%
Change 2016-2018									
Home Purchase	-10.6%	-18.4%	24.6%	-42.9%	34.8%	-40.0%	0.0%	0.0%	-30.1%
Home Improvement	-78.0%	-81.3%	-79.2%	-65.4%	-50.0%	-100.0%	0.0%	0.0%	-76.9%
Refinancing	-78.7%	-78.4%	-77.2%	-92.9%	-83.3%	-100.0%	0.0%	0.0%	-86.8%
Total	**-46.1%**	**-50.0%**	**-39.6%**	**-63.1%**	**-24.2%**	**-70.0%**	**0.0%**	**0.0%**	**-56.4%**

* Not counted towards the totals. Total numbers exclude non-applicable data.
Source: HMDA data and RKG Associates, Inc., 2020

B.   GEOGRAPHIC DISTRIBUTION OF MORTGAGE APPLICATION APPROVAL

The cumulative mortgage approval rate between 2016 and 2018 across the 17 census tracts in Moore range from 51.17% (Census Tract 2021.06) to 58.58% (Census Tract 2021.07). Census Tracts 2022.03 and 2022.05 have each seen their total applications during the three years reaching 1,000 and above, more than other census tracts in the City. The census tract with the least applications between 2016 and 2018 is 2021.04, with a total of 360 applications (Table 6-3).

However, the mortgage approval rate depends on both the number of applications and the number of approved cases in a certain neighborhood, which are associated with numerous other factors, including applicants' preference for a certain neighborhood, and the demographic and economic status of the applicants. Therefore, no single factor can explain why mortgage approval rates are higher in some neighborhoods than others. To quantify how successful mortgage applicants were in pursuing mortgage financing in each neighborhood compared to the rest of the City between 2016 and 2018, RKG developed a special matrix and this analysis is detailed below in Part D Housing Demand and Access Index Analysis.

Table 6-3

Mortgage Application Approval, 2016-2018
City of Moore Census Tracts, Oklahoma

	Total Application '16-'18	Total Approval '16-'18	Approval Rate '16-'18
2016.02	376	196	52.13%
2016.03	393	220	55.98%
2016.04	521	297	57.01%
2016.12	771	437	56.68%
2020.02	443	237	53.50%
2020.04	561	302	53.83%
2020.05	754	388	51.46%
2020.08	843	479	56.82%
2021.02	362	193	53.31%
2021.04	360	197	54.72%
2021.05	731	408	55.81%
2021.06	983	503	51.17%
2021.07	647	379	58.58%
2022.01	832	477	57.33%
2022.03	1,000	530	53.00%
2022.05	1,504	876	58.24%
2022.06	362	201	55.52%

Source: HMDA data and RKG Associates, Inc., 2020

C.   MORTGAGE APPLICATION DENIALS

Between 2016 and 2018, a total of 1,531 mortgage applications were denied, with a cumulative denial rate of 16.2%. HMDA data has provided detailed information for the 533 denials among the total denied applications by primary reasons for the denial and by applicant race/ethnicity. The details are displayed in Table 6-4.

Table 6-4

Primary Reason for Mortgage Application Denial by Race/Ethnicity, 2016-2018
**City of Moore, Oklahoma**

	Total	White	Black	American Indian /Alaska Native	Asian	Native Hawaiian /Other Pacific Islander	Two or More Races	Some Other Race	No Data/Not Applicable	Hispanic or Latino*
Debt-to-Income Ratio	138	98	7	5	11	0	0	2	15	17
Employment History	15	10	1	1	1	0	0	0	2	2
Credit History	136	84	6	11	5	3	1	3	23	7
Collateral	90	60	3	2	3	0	0	2	20	6
Insufficient Cash (Downpayment, Closing Costs)	17	12	1	0	0	0	0	1	3	2
Unverifiable Information	24	19	1	2	0	0	0	0	2	3
Credit Application Incomplete	69	47	2	3	4	0	1	0	12	4
Other	36	25	2	1	2	0	0	0	6	6
Not Applicable	8	4	1	0	3	0	0	0	0	0
Total	**533**	**359**	**24**	**25**	**29**	**3**	**2**	**8**	**83**	**47**
Percent										
Debt-to-Income Ratio	25.9%	27.3%	29.2%	20.0%	37.9%	0.0%	0.0%	25.0%	18.1%	36.2%
Employment History	2.8%	2.8%	4.2%	4.0%	3.4%	0.0%	0.0%	0.0%	2.4%	4.3%
Credit History	25.5%	23.4%	25.0%	44.0%	17.2%	100.0%	50.0%	37.5%	27.7%	14.9%
Collateral	16.9%	16.7%	12.5%	8.0%	10.3%	0.0%	0.0%	25.0%	24.1%	12.8%
Insufficient Cash (Downpayment, Closing Costs)	3.2%	3.3%	4.2%	0.0%	0.0%	0.0%	0.0%	12.5%	3.6%	4.3%
Unverifiable Information	4.5%	5.3%	4.2%	8.0%	0.0%	0.0%	0.0%	0.0%	2.4%	6.4%
Credit Application Incomplete	12.9%	13.1%	8.3%	12.0%	13.8%	0.0%	50.0%	0.0%	14.5%	8.5%
Other	6.8%	7.0%	8.3%	4.0%	6.9%	0.0%	0.0%	0.0%	7.2%	12.8%
Not Applicable	1.5%	1.1%	4.2%	0.0%	10.3%	0.0%	0.0%	0.0%	0.0%	0.0%
Total	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**

* Not counted towards the totals
Source: HMDA data and RKG Associates, Inc., 2020

The most common primary reason for application denial is unqualified debt-to-income ratios, accounting for 25.9%, followed by credit history issues, constituting 25.5%. This pattern differs among the applicants by racial and ethnic groups. Applications from Asian and Hispanic applicants were proportionally much more likely to be denied for debt-to-income ratio reasons, with their denial rates for this reason at 37.9% and 36.2%, respectively. Applications from American Indian/Alaska Native applicants, applicants of two or more races and applicants of some other race were more likely to be denied for credit history issues than average, with their respective denial rates for this reason at 44.0%, 50.0%, and 37.5%. Besides, all three applications from Native Hawaiian/Other Pacific Islander applicants were denied for credit history issues.

Figure 6-1
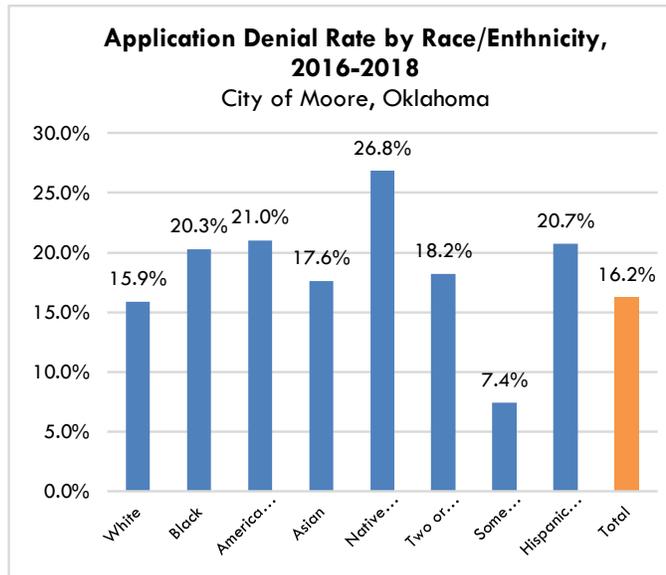
Source: HMDA Data and RKG Associates, Inc., 2020

Based on the total 1,531 denied applications between 2016 and 2018, the cumulative mortgage application denial rate is 16.2%. However, there is a disparity of denial rates across the racial and ethnic groups of applicants. Native Hawaiian/Other Pacific Islander applicants have seen the highest denial rate at 26.8% across all racial and ethnic groups, followed by American Indian/Alaska Native, Hispanic, and Black applicants, with their denial rates range between 20% and 21%. Applicants of Some Other Race have seen the lowest denial rate at 7.4% (Figure 6-1).

D.   MORTGAGE DEMAND AND ACCESS INDEX ANALYSIS

RKG Associates prepared a special analysis of housing demand and access that examined how each racial or ethnic group performed in home purchase loan applications within each census tract between 2016 and 2018. The purpose of the analysis was to identify patterns of performance differences within each group as compared to how the group performed on average across all census tracts over the two years. "Mortgage Demand and Access Index" is a statistical measure constructed by RKG to measure and compare the relative success rate of home purchase loan application of each racial and ethnic group based on (1) the group's ability to pay or purchase a home, (2) the proportion of the applicants by racial and ethnic group to the total population of loan applicants, (3) the loan denial rate by racial and ethnic group, and (4) the propensity of each racial and ethnic group to buy or rent within the 17 census tracts in Moore based on known housing tenure rates.

1.   Home Purchase Loan Application Activity

Among the 4,928 home purchase loan applications with documented race and ethnic information of applicants, 82.47% of them were submitted by White applicants, accounting for most applicants for home purchase loans, followed by Hispanic applications, with a percentage of 7.97%. 5.82% of the applications were submitted by American Indian/Alaska Native applicants, followed by Asian and Black applicants, making up 4.87% and 4.06% of the home purchase loan applicants, respectively. Applicants in other racial and ethnic groups constitute between 0.16% and 2.05% of all home purchase loan applicants (Table 6-5).

2. Ability-to-Pay Index

The first factor of the Housing Demand and Access Index is the "Ability-to-Pay" Index by race and ethnicity, which is the proportion of a racial/ethnic group's median household income on the County level compared to the County-wide median of $60,632, based on 2017 American Community Survey (ACS) estimates. RKG used Cleveland County median household income data by race and ethnicity because the margin of error for the City-level data was too high and potentially unreliable. This was most acute for small racial/ethnic groups. While County incomes may not align perfectly with Moore estimates, it is suitable for purposes of this analysis.

An applicant's ability to successfully obtain mortgage financing depends on several factors but is mostly dependent on the applicants' ability-to-pay for mortgage expenses (i.e., principal, interest, taxes, and insurance). Households with higher incomes will have more options and access to mortgage loans options.

The Ability-to-Pay Indices that are above 1.0 represent higher household incomes than the County median and those below 1.0 represent income levels lower than the County median. Only the White and Asian groups had index values of 1.0 or higher (Table 6-6).

Table 6-5
Mortgage Loan Applications (2016-2018)
City of Moore, Oklahoma

Race/Ethnicity	Number	Percent
Total	**4,928**	**100.00%**
White	4,064	82.47%
Black	200	4.06%
American Indian /Alaska Native	287	5.82%
Asian	240	4.87%
Native Hawaiian/Other Pacific Islander	28	0.57%
Two or More Races	8	0.16%
Some Other Race	101	2.05%
Hispanic/ Latino*	393	7.97%

* Not counted towards the totals. Non-applicable data is excluded.

Source: HMDA data and RKG Associates, Inc., 2020

Table 6-6
Ability-to-Pay Index by Race/Ethnicity (2017)
Cleveland County, Oklahoma

Race/Ethnicity	Median HH	Index
Cleveland County Median HH Income	**$ 60,632**	**1.00**
White	$62,160	1.02
Black	$41,024	0.52
American Indian/Alaska Native	$52,183	0.84
Asian	$60,724	1.00
Native Hawaiian/Other Pacific Islander	$38,886	0.44
Two or More Races	$55,560	0.91
Some Other Race	$49,770	0.78
Hispanic or Latino	$51,864	0.83

Source: ACS 2017 Estimates and RKG Associates, Inc., 2020

3. Mortgage Demand Index

The "Mortgage Demand Index" is the proportion of the number of mortgage applications submitted between 2016 and 2018 by each racial and ethnic group as a percentage of each group's share of the current population within each census tract. For example, if the percentage of the Hispanic or Latino population in Census Tract 2016.02 is 11.3%, and the number of loan applications from this group accounted for 9.5% of the total submitted, then the Mortgage Demand Index is 0.84 (9.5% ÷ 11.3% = 0.84) in this census tract. This index value accounts for the fact that many people tend to gravitate to various neighborhoods that they prefer or where other people in their social network, racial and ethnic groups already live. In some respects, people naturally self-select their neighborhoods based on these and many other factors.

4. Mortgage Success Index

The "Mortgage Success Index" measures the relative net success rate of mortgage originations to mortgage denials by race/ethnicity. For example, in Census Tract 2016.02, there were 114 mortgage loan originations with a total of 10 denials resulting in a net of 104 mortgage loan approvals, at a

net success rate of 91%. For applicants of Some Other Race, there was one mortgage originated and no denial, so their net success rate was 100% in this census tract. Therefore, their Mortgage Success index was 1.10 (100% ÷ 91% = 1.10).

5.   Results of Mortgage Demand and Access Index

Once the three key indices were calculated for each census tract, an overall "Mortgage Demand and Access Index" was calculated, and the results were mapped to examine where in the City racial and ethnic groups may be having difficulty accessing mortgage financing for home purchases. This analysis does not account for access issues related to rental housing and is not considered a definitive indicator of different peoples' ability to access mortgage loans. No single factor can explain why a given group of households was successful or unsuccessful in obtaining mortgage financing in any part of the City, but this analysis examines some of the most likely factors.

To obtain a final score for each group in each census tract, RKG weighted each index score to reflect its relative importance to each group's ability to obtain mortgage financing for home purchases. The Ability-to-Pay Index received the highest weighting factor at 50% of the final score since it is the strongest determinant of success in pursuing a home purchase loan. Income is also correlated with a household's credit score, which is another important factor leading to a favorable credit decision.

Net Mortgage Success Index was assigned a weighting factor of 35% and Mortgage Demand Index was assigned a weighting factor of 15% so that variations between the demand and success among the various race and ethnic groups can be identified. Net mortgage success is a function of a lot of factors but mostly relate to a group's ability to successfully obtain a mortgage loan to purchase a home. While some of those factors are related to a group's ability to pay, credit scores, and similar factors, excessive loan denial rates could denote something else. Conversely, a group's success rate at obtaining mortgage financing in Moore's neighborhoods can only be judged by the demand exhibited by each group to live in these neighborhoods. If Hispanic households do not pursue mortgages to buy homes in a given census tract, it is difficult to judge why that has occurred. But if Hispanic households pursue mortgage loans in certain neighborhoods but are denied at rates exceeding their city-wide denial rates, this may indicate that barriers exist.

The combined index scores for all census tracts by race/ethnicity indicate that American Indian/Alaska Native (1.19), Asian (1.08), Some Other Race (1.06), White (1.03), and have had the greatest success in obtaining mortgage loans since 2016. Note that the Native Hawaiian/Other Pacific Islander population has an average score of zero. This is because there is no ownership housing unit with Native Hawaiian/Other Pacific Islander householder in the city according to ACS 2017 Estimates, which is one of the factors in the index calculation, and therefore producing a zero index.

Table 6-7

Mortgage Demand and Access Index, City-Wide Average City of Moore, Oklahoma

|	Average
Total Racial and Ethnic Groups	**1.00**
White	1.03
Black	0.81
American Indian/Alaska Native	1.19
Asian	1.08
Native Hawaiian/Other Pacific Islander	0.00
Two or More Races	0.62
Some Other Race	1.06
Hispanic or Latino	0.94

Source: RKG Associates, Inc., 2020

Index values shown on the maps represent a racial or ethnic group's index value for each census tract and the values shown in Table 6-7 reflect the average index value for all census tracts city-wide by group. The darker colored census tracts with values greater than 1.0 indicate that the racial or ethnic group performed better in those census tracts. The opposite is true for lighter shaded tracts. Some groups did not perform well in some census tracts because they did not seek mortgage applications for

homes in those census tracts. Those are internal decisions that applicants make based on unknown factors, but they could be related to home sales prices, crime rates, perceptions of school quality, the quality of homes or even the racial composition of the neighborhood.

Excluding the Native Hawaiian/Other Pacific Islander population, people of Two or More Races, the Black population, and the Hispanic population have Demand and Access Index scores below the city-wide average, at 0.62, 0.81 and 0.94, respectively. This indicates that these minority/ethnic groups have less success in obtaining mortgage financing for home purchases compared to other racial and ethnic groups in Moore according to the Demand and Access Index. However, again, this index does not measure all the numerous factors that influence a racial/ethnic group's success in securing home mortgage loans.

Map 6-1: Mortgage Demand & Access Index (White)
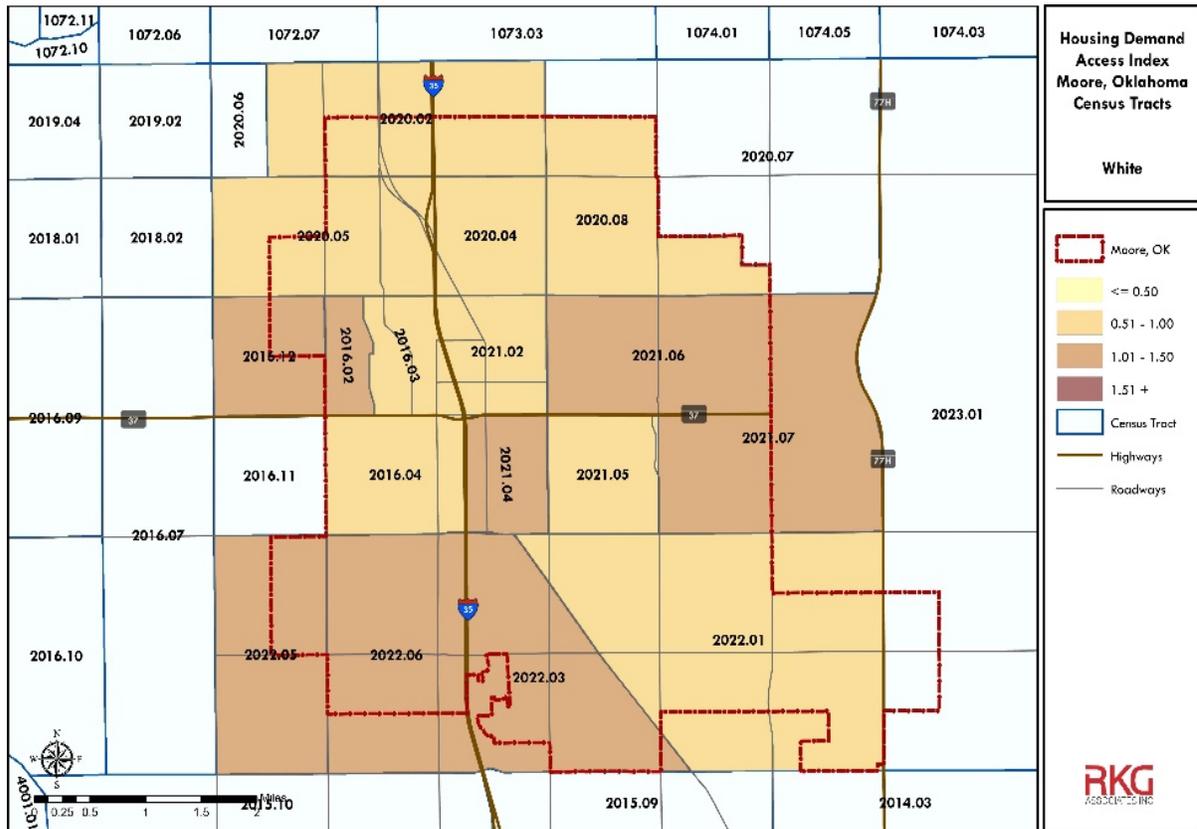
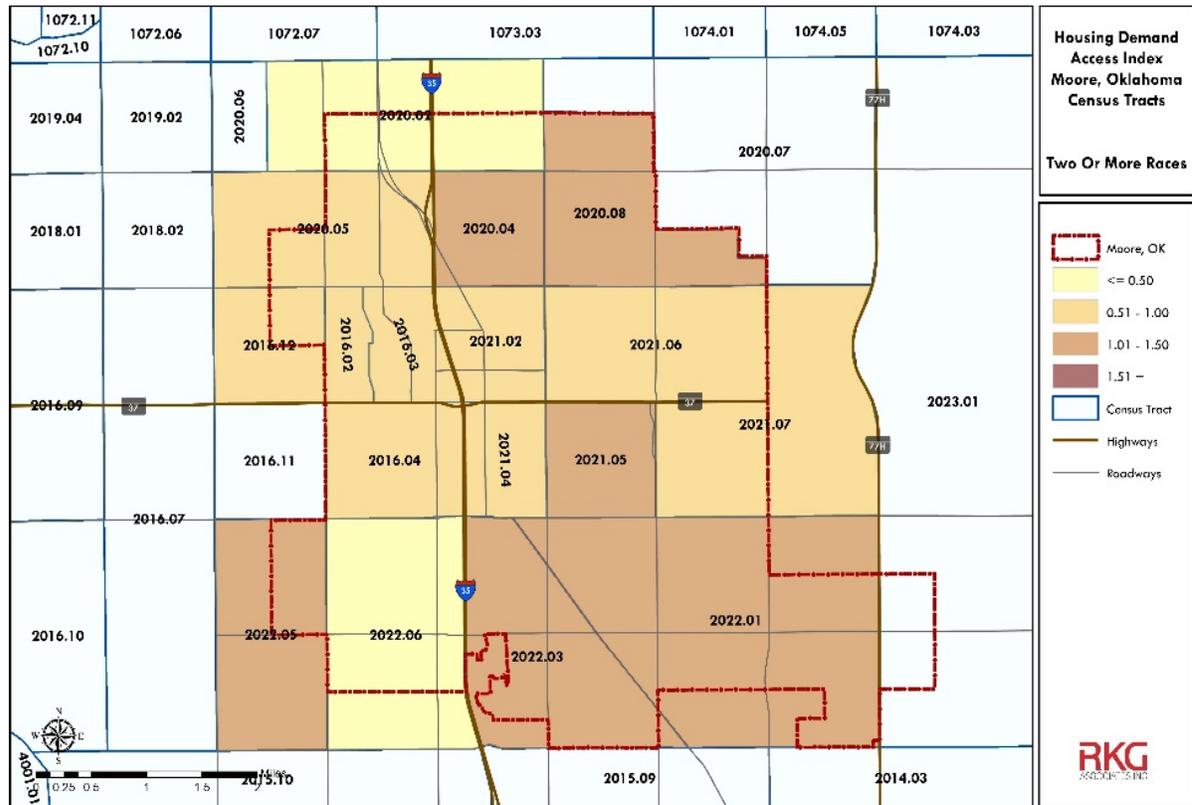**Map 6-2: Mortgage Demand & Access Index (Black)**
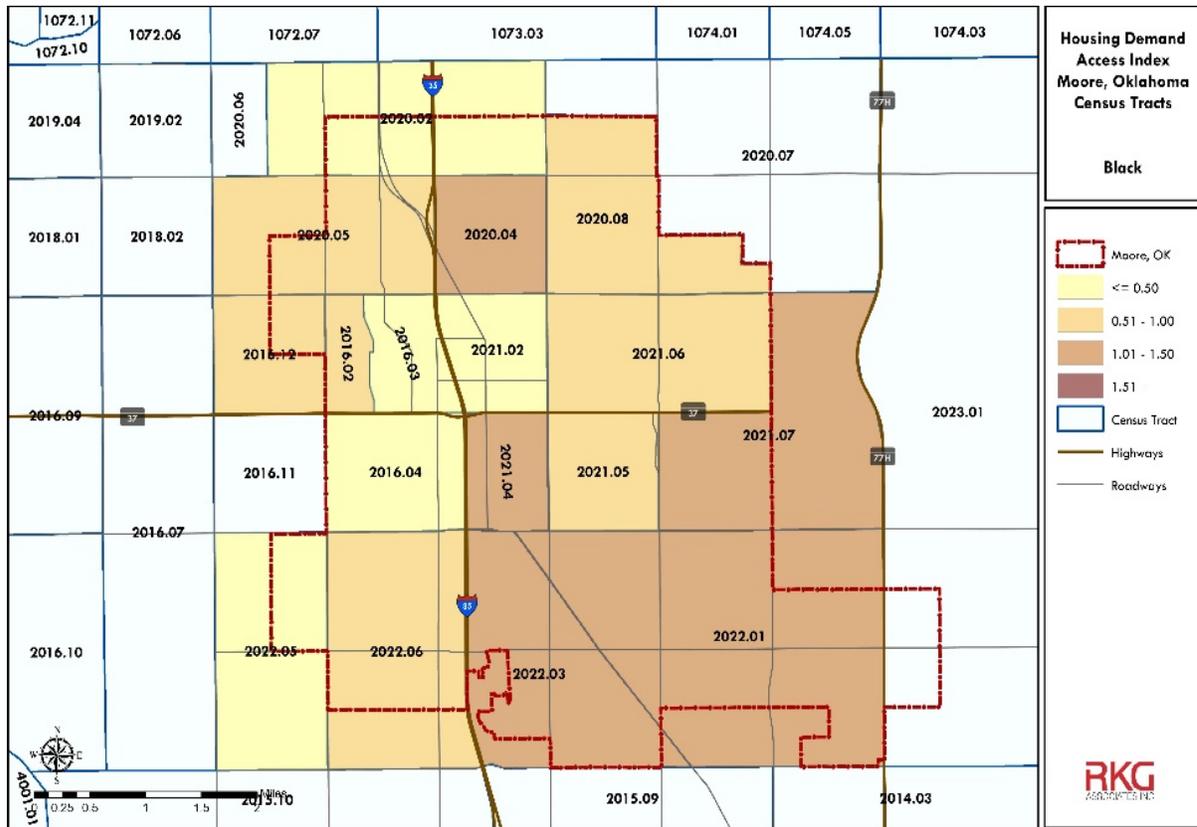
Map 6-3: Mortgage Demand & Access Index (American Indian/Alaska Native)
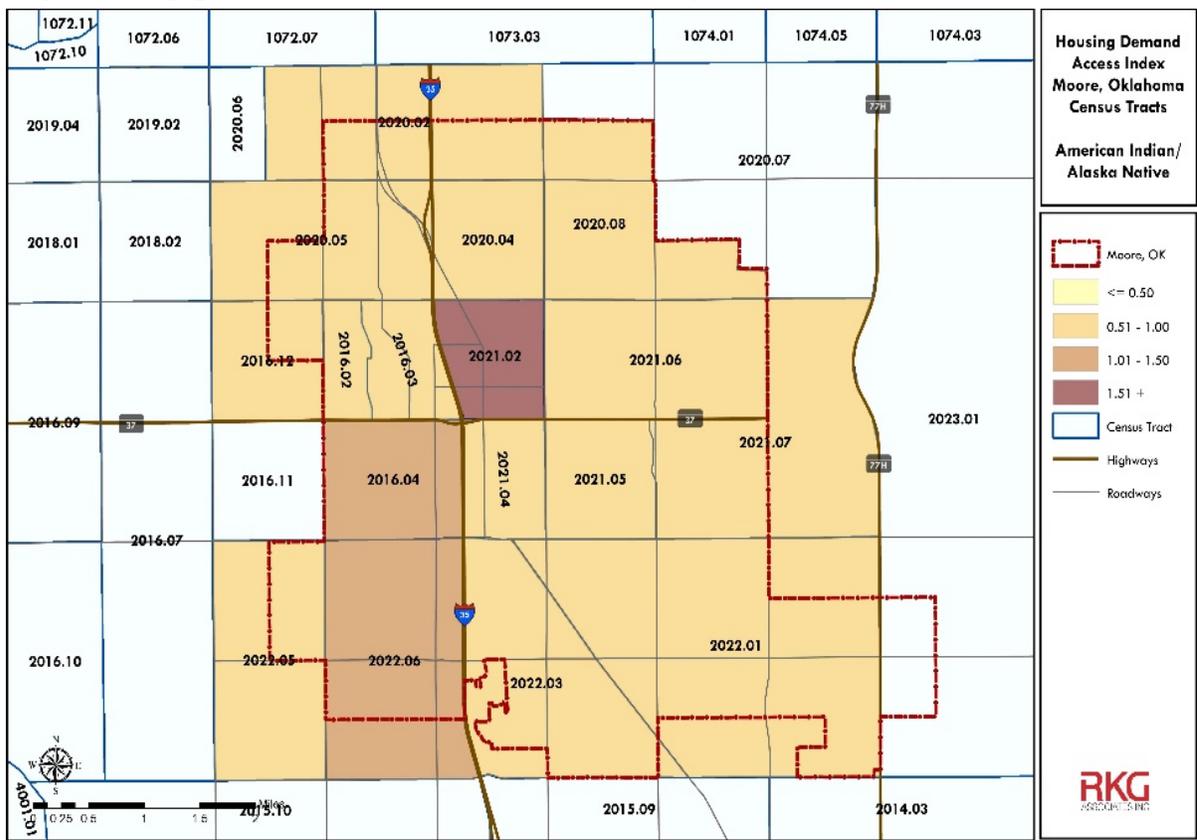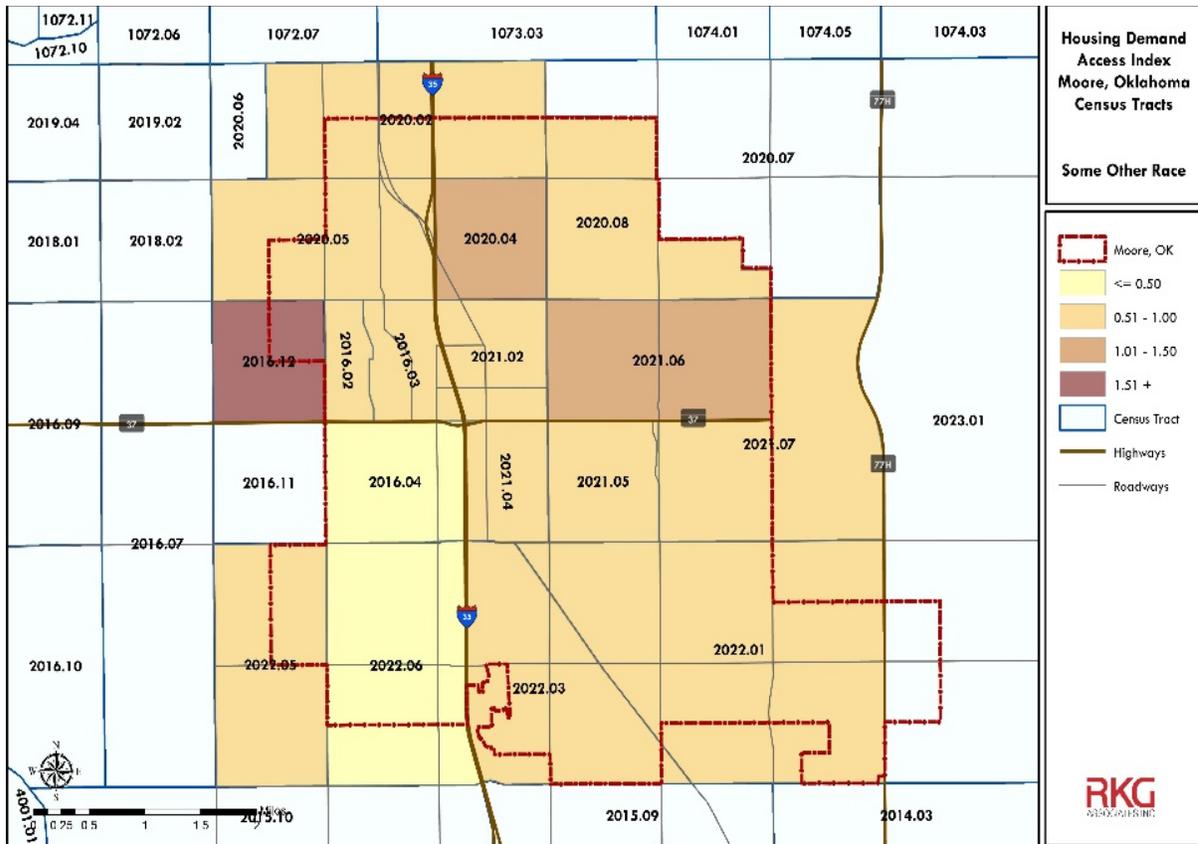
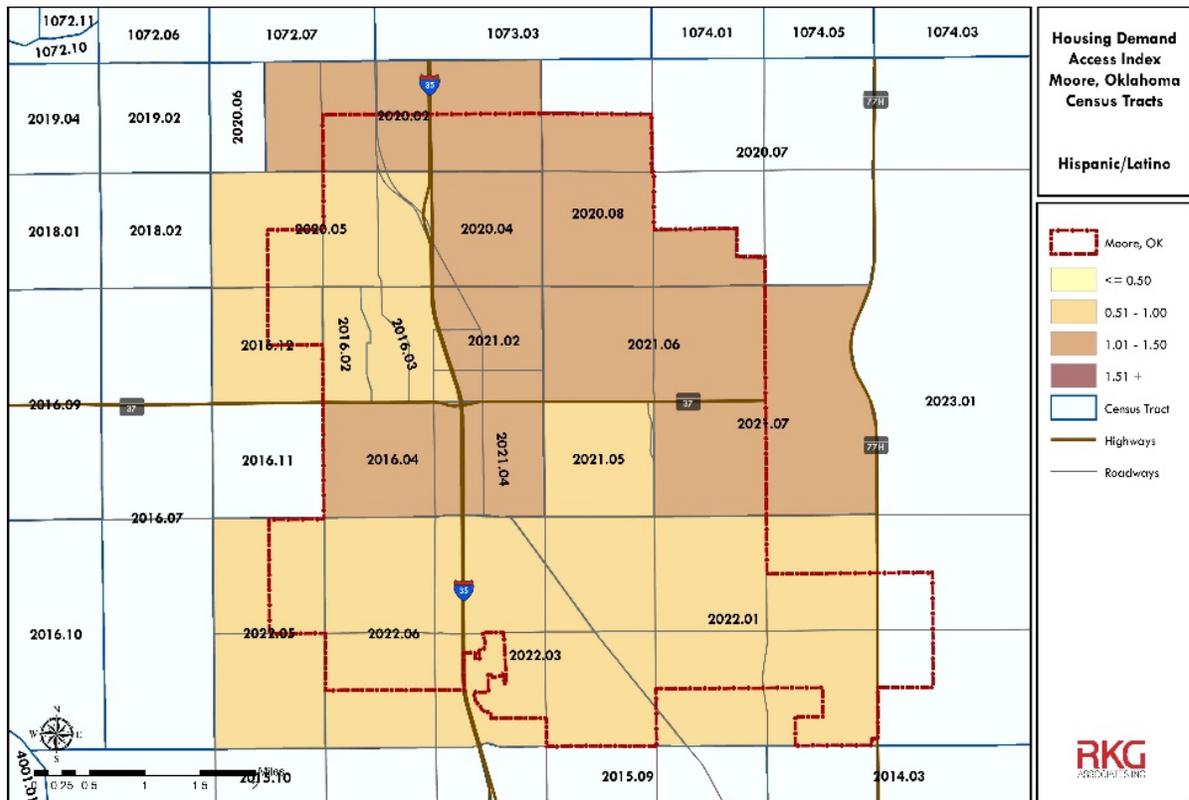**Map 6-4: Mortgage Demand & Access Index (Asian)**
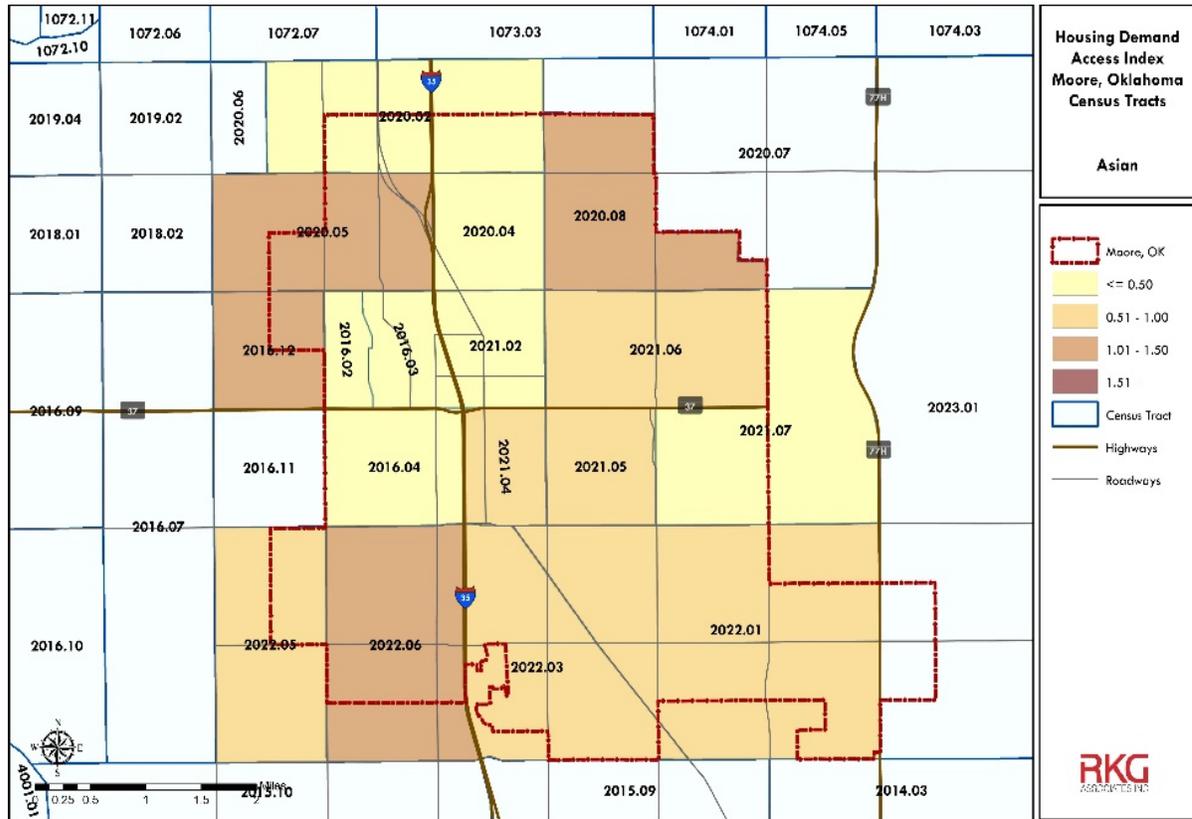
Map 6-5: Mortgage Demand & Access Index (Two or More Races)

Map 6-6: Mortgage Demand & Access Index (Some Other Race)

Map 6-7: Mortgage Demand & Access Index (Hispanic/Latino)

E.   HIGH-COST LENDING

A subprime mortgage is a type of home loan issued to borrowers with low credit scores (often below 600) who are unqualified for conventional mortgages. Subprime mortgages usually come with much higher interest rates and down payments than conventional options because the borrowers often are at higher default risks. However, more expensive subprime loans are sometimes issued to some borrowers with high enough household incomes, credit scores, and available down payments to qualify for conventional loans. Historically, this is especially true for minority groups, which usually see higher percentages of subprime borrowers. The decision and practice of subprime lending targeting borrowers' racial or ethnic status constitute mortgage discrimination.

Since 2005, Housing Mortgage Disclosure Act data has included a new category of information called "rate spared." It represents the difference between the loan interest rate and the prevailing U.S. Treasury standard. Though HMDA does not require lenders to report credit score data of applicants which can be used to determine which loans are subprime, the "rate spread" data can help identify "high-cost" loans, which is a strong predictor of subprime lending and possible mortgage discrimination.

A loan is considered high cost if it meets one of the following criteria:

- A first-lien loan with an interest rate at least three percentage points higher than the prevailing U.S. Treasury standard at the time the loan application was filed. The standard is equal to the current price of comparable-maturity Treasury securities.
- A second-lien loan with an interest rate of at least five percentage points higher than the standard.

Table 6-8 shows the total cases of high-cost lending by borrowers' racial or ethnic group between 2016 and 2018 in Moore. The city-wide average high-cost lending rate for all racial/ethnic groups is 0.54%, which is calculated by comparing the number of high-cost lending cases to the total amount of originated and approved not accepted applications. The high-cost lending rate for each racial and ethnic group is generally quite low, between 0% and 1.5%. However, the Black borrowers were more likely to experience high-cost lending during the two years compared to other groups, with the highest high-cost lending rate of 1.29%, followed by the Asian population and the American Indian/Alaska Native borrowers, with rates higher than average at 0.86% and 0.69%, respectively.

Table 6-8

Cumulative High Cost Lendings by Race/Ethnicity, 2016-2018

City of Moore, Oklahoma

	No. of High Cost Lendings	Total Originated/ Approved Not Accepted Applications	High Cost Lending Rate
White	27	4,816	0.56%
Black	3	233	1.29%
American Indian/Alaska Native	2	290	0.69%
Asian	2	232	0.86%
Native Hawaiian/Other Pacific Islander	0	25	0.00%
Two or More Races	0	7	0.00%
Some Other Race	0	87	0.00%
No Data/Not Applicable	2	930	0.22%
Hispanic or Latino*	2	422	0.47%
Total	**36**	**6,620**	**0.54%**

* Not counted towards the totals

Source: HMDA data and RKG Associates, Inc., 2020

The cumulative high-cost lending rates between 2016 and 2018 are depicted on Map 6-8 as darker shaded census tracts. Given that the city-wide average is 0.54%, the data map indicates census tract that are more likely than others to experience high-cost lending practices. High-cost lending has occurred slightly more often Census Tracts 2016.03 and 2020.02, but these practices do not occur that often in Moore.

Map 6-8
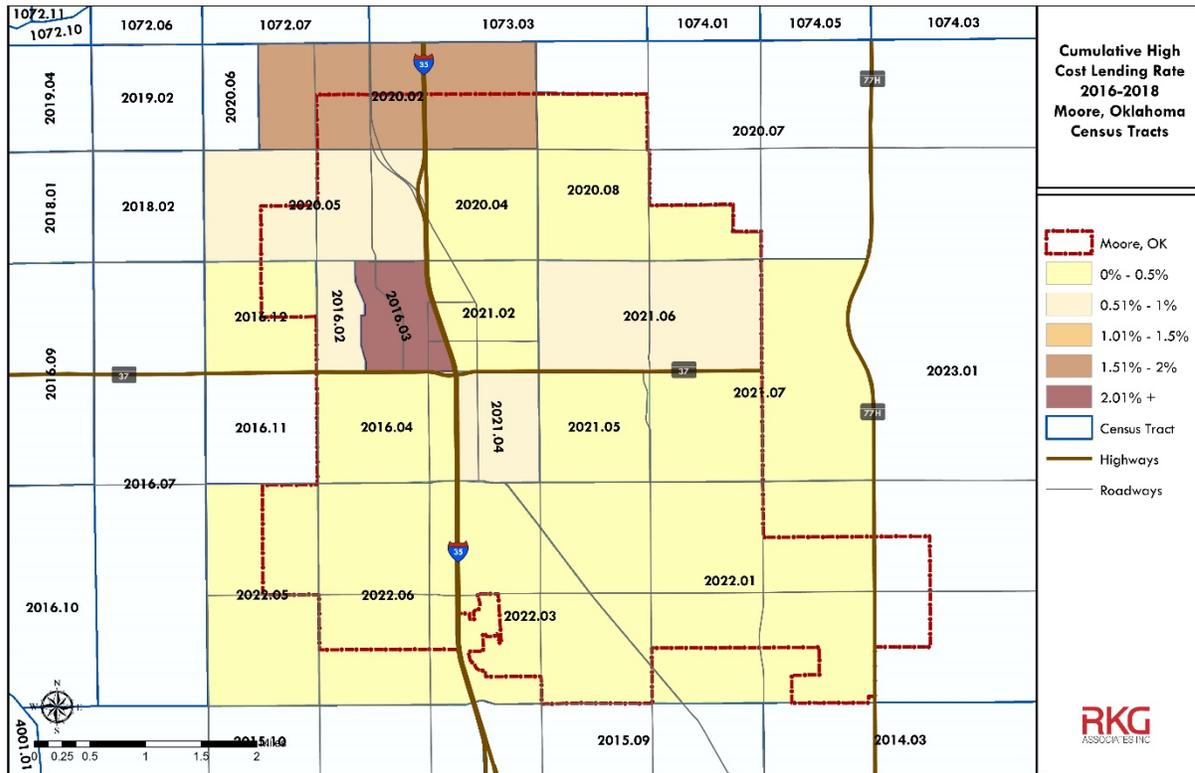
F. REAL ESTATE ADVERTISING AND AFFIRMATIVE MARKETING

RKG Associates also examined Realtor websites to assess if real estate brokers and sales offices are providing information supporting people's rights to fair housing choice in their advertising and marketing practices. This assessment also identified potentially discriminatory language used on real estate listing websites in Moore's home sales and rental markets.

In general, major real estate listing services such as Century 21, Zillow/Trulia, Apartments.com and Coldwell Banker have specific overall statements expressing their support of the principles of the Fair Housing Act and the Equal Opportunity Act. Century 21 prohibits "discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions." Also, each Century 21 Real Estate LLC franchised office is contractually required to comply, in all respects, with all laws, rules and regulations applicable to the real estate industry, including without limitation, the requirements imposed by the Fair Housing Act.

Apartments.com prohibits advertising "any preference, limitation, or discrimination because of race, color, religion, sex, handicap, familial status, or national origin, or intention to make such preference, limitation or discrimination." Zillow/Trulia has provided a detailed article explaining the basics of the Fair Housing Law (https://www.zillow.com/rental-manager/resources/fair-housing-guide/). Coldwell

Banker has listed the laws that protect the fair housing rights, the responsibilities of home sellers and real estate professionals, and resources to seek help when the violation of rights occurs.

However, most of Moore's local real estate agency websites do not have languages or statements related to fair housing. One local realty, Rose Rock Realty, has listed the logo of Equal Housing Opportunity at the bottom of their website.

G.   HOUSING MARKET OVERVIEW

Residential sales activities, home value, and rent levels are vital indicators of the overall well-being of a community's housing market, displaying the relations between the housing demand and supply. The RKG team obtained the residential sales data from the Oklahoma City Metropolitan Association of Realtors (MLSOK), and the median home value and the median monthly gross rent data from the American Community Survey 2017 5-Year Estimates to provide an overview of Moore's housing market.

1.   Home Value and Sales Trend

The residential sales data indicates that Moore's home sales market performance has generally been improving between 2017 and 2019, especially since 2018. Despite a drop in closed sales between 2017 and 2018, the total closed sales climbed from 1,144 in 2018 to 1,287 in 2019, at a rate of 12.5%. Most of the closed sales were single-family homes, and this trend has been strengthening during the two years. Moore has also seen more showings per listing, reduced months of inventory, fewer days of listed properties on market, and narrowing gap between list prices and sales prices. All these factors indicate a strengthening home sales market and higher demand, especially between 2018 and 2019 (Table 6-9).

Table 6-9

Residential Sales Activity, 2017-2019

City of Moore, OK

|	2017	2018	2019	Annual Percent Change	
				17-'18	18-'19
Total Closed Sales	1,255	1,144	1,287	-8.8%	12.5%
Percent Single Family	98.6%	99.3%	99.5%	0.7%	0.2%
Percent Townhouse-Condo	1.4%	0.7%	0.5%	-0.7%	-0.2%
Showings Per Listing	5.11	6.19	6.20	21.1%	0.2%
Months of Supply of Inventory	2.8	2.1	1.0	-25.0%	-52.4%
Days on Market	48	44	34	-8.3%	-22.7%
Pct. of List Price Received	98.5%	98.7%	99.0%	0.2%	0.3%

Source: MLSOK and RKG Associates, Inc., 2020

There has been an upward trend in the median sales price of homes between 2013 and 2019 in the City of Moore (Figure 6-2). The median sales price rose from $128,000 in 2013 to $164,900 in 2019, gaining by 28.8%, which is 4.8% annually. It also shows a much steeper growth between 2018 and 2019 at 10.9%, indicating that the tight supply is pushing up residential sales prices in Moore.

According to 2017 American Community Survey 5-Year Estimates, the median home value in Moore increased by 14.9% between 2012 and 2017, or 3% per year (Table 6-10). This corresponds with the upward trend of the median sales price of homes as discussed, and it also shows that the median home value in Moore has accelerated faster than the growth of median household income annually between 2012 and 2017.

Map 6-9 and Map 6-10 display the 2017 median home values and the annual percentage changes of median home value between 2012 and 2017 by census tract in Moore. The data was also obtained from the 2017 American Community Survey 5-Year Estimates.

Figure 6-2
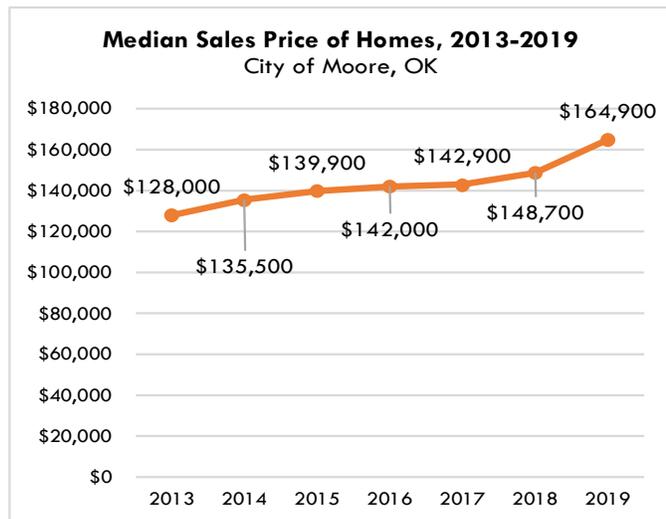
Source: MLSOK and RKG Associates, Inc., 2020

The map shows that the median value of homes around the Old Town and in neighborhoods where there are higher proportions of Section 8 Voucher units are generally lower compared to the rest of the City. Census Tract 2016.03 which has the highest percentage of high-cost lending cases is even the only census tract that saw a decline in its median home value between 2012 and 2017. Neighborhoods in the rest of the City have all seen an increase in their median home value during the same period, especially Census Tract 2016.04, Census Tract 2020.05, and the east side of the City.
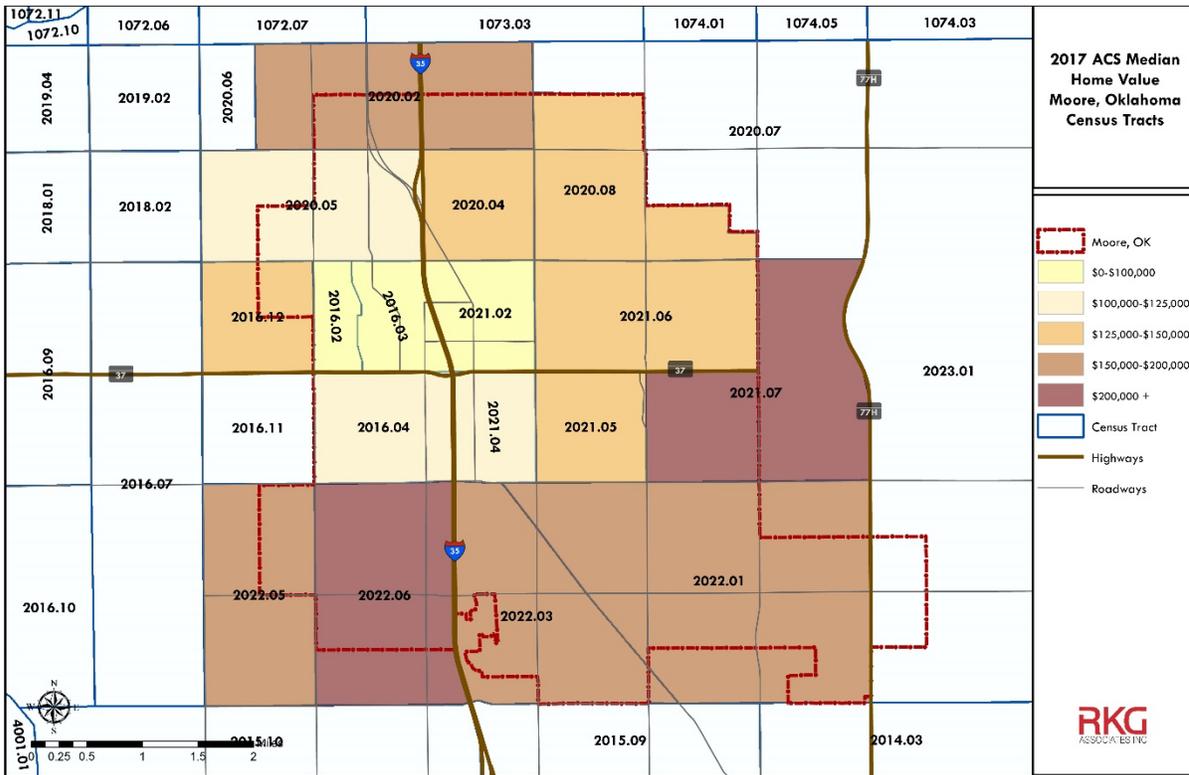
Table 6-10

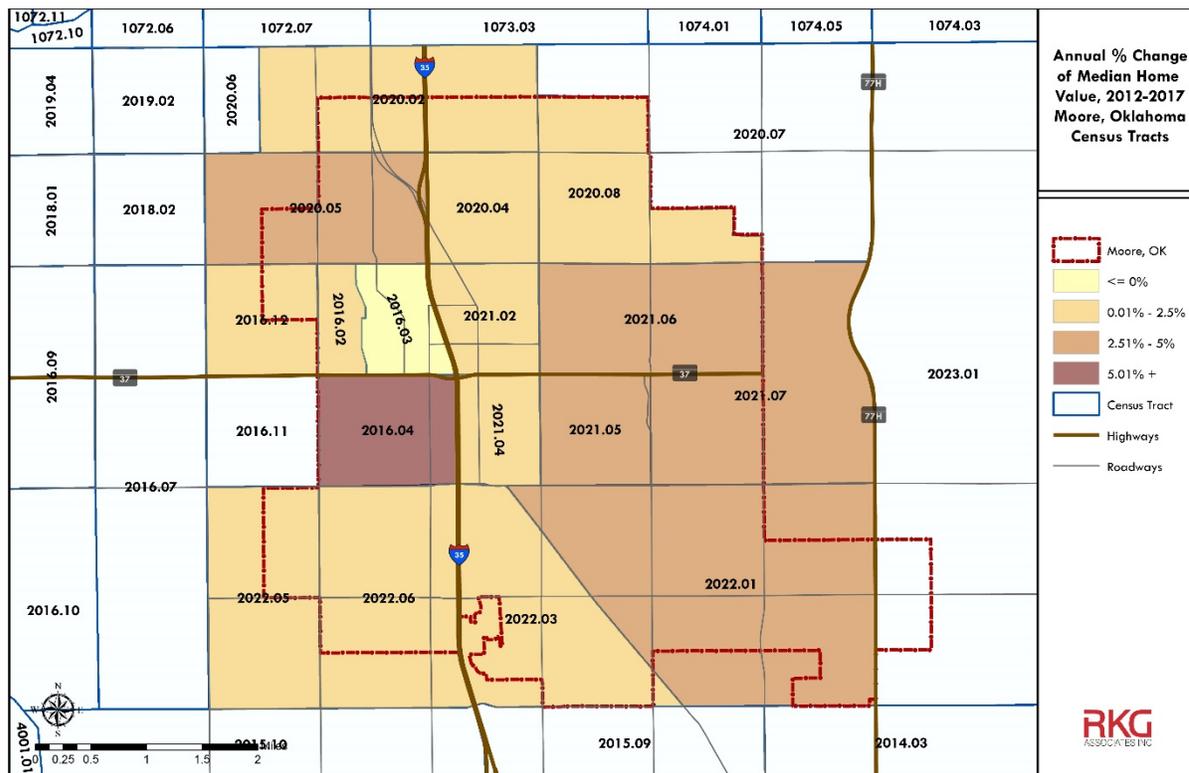**Median Home Value, Gross Rent and Household Income, 2012-2017
City of Moore, OK**

	Median Home Value	Median Gross Rent	Median HH Income
2012	$116,500	$858	$56,892
2013	$119,700	$884	$57,294
2014	$121,700	$911	$58,542
2015	$124,100	$902	$58,169
2016	$126,200	$934	$60,474
2017	$133,900	$963	$62,347
Change '12-'17	$17,400	$105	$5,455
Ann. % Chg. '12-'17	2.99%	2.45%	1.92%

Source: 2017 ACS 5-Year Estimates and RKG Associates, Inc., 2020

Map 6-9

Map 6-10

2.   Rental Rate Overview

Table 6-10 shows that the citywide median gross rent in Moore between 2012 and 2017 rose by 12.2%, or 2.5% annually. This is also faster than the growth of the median household income in the City, which increased by 9.6% during those five years, or 1.9% per year. These trends should be concerned for affordable housing advocates as real estate values and rents continue to outpace incomes.

RKG also adopted a ranking method to show which neighborhoods in the City have higher rent rates considering all bedroom types. All census tracts with available median gross rent data were ranked and received scores from one to seventeen based on their median gross rents from low to high under each bedroom type. If the median gross rent for a certain bedroom type is not available in a census tract, then it received a score of zero. The total score of all bedroom types was then summed for each census tract, which was ranked again based on its total score.

Map 6-11 displays the results across Moore, with census tracts of darker shades indicating higher total scores, and therefore, higher median gross rent levels considering all bedroom types. The map shows that Census Tracts 2016.12, 2016.04, 2022.03, 2021.04, and 2021.07 which are along I-35 and Highway 37 most likely have the least affordable rental market according to the ACS 2017 5-Year Estimates.

Map 6-11
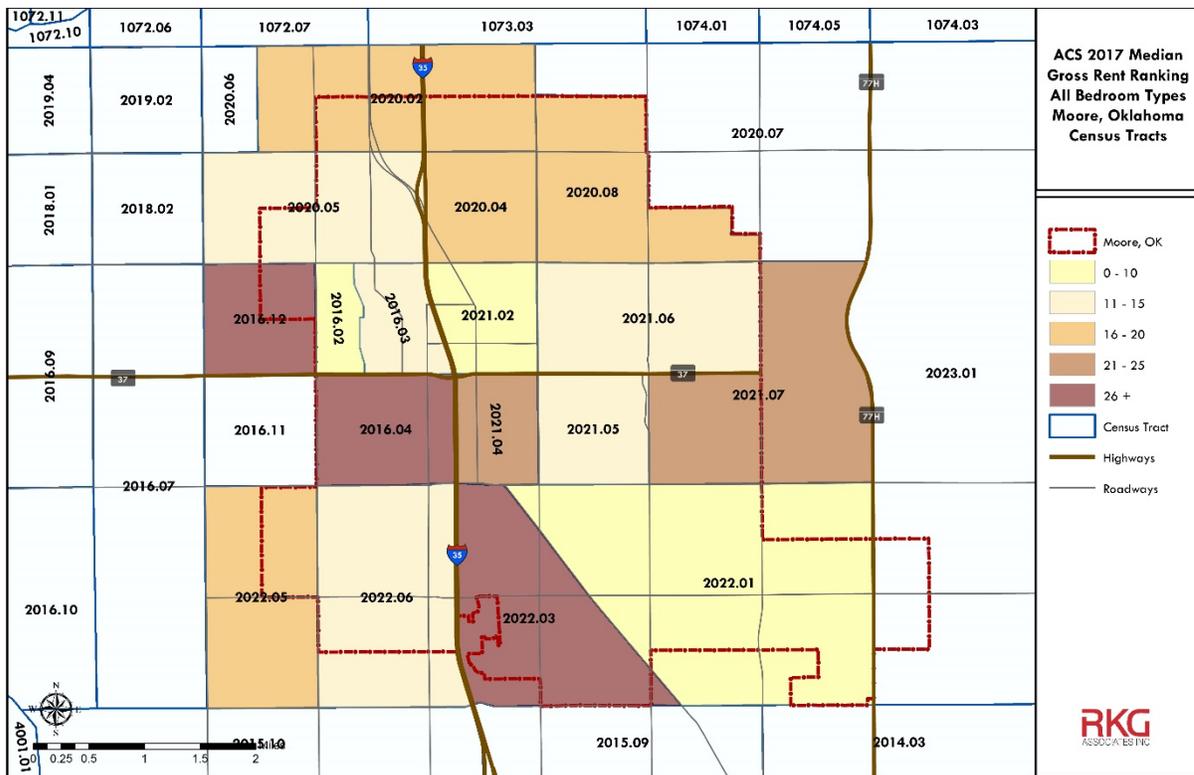
7 *IMPEDIMENTS TO FAIR HOUSING CHOICE*

This section summarizes the impediments to fair housing choice in Moore found in the previous chapters of this analysis and proposes recommendations to the City to address such impediments.

A.   HOUSING AND SOCIAL SERVICE ORGANIZATION INTERVIEWS

The consultant spoke with seven housing- and service-related organizations in the Cleveland County service area between June 9 and June 15, 2020. The purpose of the interviews was to understand the current capacity of these organizations versus the existing housing demand and to identify impediments to fair housing. All these organizations serve Cleveland County or smaller areas that include the City of Moore. Topics discussed include affordable housing development, housing related services, and fair housing issues. The seven interviewed organizations include:

- Aging Services, Inc.
- Cleveland County Habitat for Humanity
- Metropolitan Fair Housing Council of Oklahoma, Inc.
- Norman/Cleveland County Continuum of Care
- Central Oklahoma Community Action Agency
- Oklahoma Housing Finance Agency
- Neighborhood Housing Services Oklahoma

1. Affordable Housing Development

- 99% of the applicants for affordable housing in Cleveland County have incomes 80% of AMI or below in 3-to-4-person households.
- Most of these applicants are white, followed by black, Hispanic, and the Native American population.
- Not all affordable housing development organizations have access to federal or state funding. Some has very limited capacity and funding compared to the high demand as most existing funding sources, including the federal funding, are limited to disaster areas and rebuilding, especially after the 2013 tornado. In this instance, 70% of the affordable home development costs rely on various private funding sources.
- Though state funding has remained, federal funding has decreased in recent years with the loss of 2013 tornado disaster relief funding.
- The current application/demand for low income housing tax credits is usually three to four times the funds available each year.
- Fundraising takes the longest during the development process and thus has hindered the capacity to build more affordable housing.
- The increasing development costs is another challenge as construction costs have increased by 13% in recent years.
- There are desperate needs for housing mostly for the low-to-moderate-income population (60% of AMI and below) who do not qualify for most mortgages, and especially the low-income population who do not qualify for any type of mortgage.

- One interviewed organization can build one home per year though they receive 50 to 60 applications annually. They estimated that they would need over $2 million in additional funding per year to build enough affordable ownership homes for all qualified applicants in the County.
- Demand for housing in Oklahoma has always outpaced the availability. There have been more applications/needs for affordable rental housing than ownership housing in general.
- Many families are forced to rent though they want to own homes because there are limited affordable homes available and many applicants' credit scores are not high enough for mortgage applications.
- Developers have not been able to build affordable housing fast enough to catch up with the demand for both ownership and rental housing.
- Interviewees hope to expand their cooperation with the City of Moore, for example in terms of down payment assistance, vacant home/land donation from the City, funding for land purchases, and partnership to build more affordable housing projects.
- Some regional housing stakeholders do not have partnerships with local organizations in the City of Moore for the affordable housing referral process though such partnership exists in other cities.

2. Housing-Related Services

- There have been demands for major home repair services (1-4 requests per week) for the low-and-moderate-income population in Cleveland County, especially in rural areas, but local organizations do not have the capacity to serve.
- There has been high demand from seniors for more transit services with expanded routes in the City of Moore, especially in rural areas. There is also an unmet need for transit routes connecting the City of Moore and the City of Norman for seniors.
- More funding is also needed to expand the home repair, housekeeping, and other related household services for seniors to catch up with the demand, which is estimated to require at least $150,000.
- While most seniors currently prefer to age in place, this has become challenging due to unmet demands for housing-related services.
- If there are more affordable senior living options, more seniors would likely choose to live in senior housing.
- There have been around 30 requests for rent assistance over the past seven months in Cleveland County.
- The demand for rent and utility assistance has been the highest compared to other services as most applicants are unemployed.
- There have been more female applicants who are single.
- Funding for rent and utility assistance usually is expended very quickly once it becomes available.
- The City of Moore does not receive HUD funding for special housing for the homeless population, and the city does not have a temporary housing program.
- The homeless population in Moore currently relies on charitable/religious/non-profit organizations for temporary housing/shelter need.

3. Fair Housing Issues

- Though the current capacity is enough to help resolve fair housing issues, education and awareness outreach regarding tenants' rights, federal housing laws, and ordinances are important as they help to prevent fair housing issues before they occur.
- More funding is needed to conduct direct contact and education as a lot of the low-income population do not have direct access to the internet.
- There is also a need for self-help services and mediation/legal services for the "working poor" population who do not qualify for low-income benefits. More resources are needed to provide such services which currently do not exist.

B. INCREASED ACCESS TO AFFORDABLE HOUSING

The City's median home value between 2012 and 2017 gained by 2.99% per year, and the median gross rent increased by 2.45% annually during the same period. In comparison, Moore's median household income grew slower during those five years by 1.92% per year. This indicates that the growth rate of household wealth has not caught up with the acceleration of the housing market in Moore, reducing the housing affordability in the City.

Since 2015, Moore has started to see the creation on new affordable housing, mostly through the construction of new LIHTC projects. Those include:

- **Lyon Estates (92 market rate and affordable units)**
  215 N Eastern Ave, Moore, OK
  Lyons Estates was built in part with financing obtained through the Low-Income Housing Tax Credit (LIHTC) program. In addition to providing apartments for low-income households, this property includes some market rate units. Households earning 60% or less of the Area Median Income (AMI) qualify for targeted rental units in LIHTC financed housing.

- **The Curve (244 units, 219 affordable and 25 market rate)**
  Southwest 17 & Janeway Avenue, Moore, OK
  The City received Community Development Block Grant-Disaster Recovery (CDBG-DR) funds from the Department of Housing and Urban Development (HUD) in response to the May 20, 2013 tornado. A portion of this grant is being used to fund The Curve, a mixed-income, mixed-use development. The Curve will be located at SW 17th and Janeway Avenue, where the Royal Park Mobile Home community once stood. The site is a little over 14 acres. It will include three buildings, one of which will be mixed use. The total development cost will be $49.7 million, which includes a $15.9 million subsidy provided by the CDBG-Disaster Relief funds.

C. LACK OF AFFORDABLE HOUSING ORGANIZATIONS AND PARTNERS

As identified in the 2015 AI, Moore does not have a public housing agency or authority to develop or administer publicly supported housing in the City. Approximately 202 Section 8 Vouchers are administered in the City under the Oklahoma Housing Finance Agency (OHFA). HUD's Section 8 program is a voucher program or rental subsidy that places low- and moderate-income persons in private housing units that meet minimum housing quality standards and the landlord is paid a rent subsidy through HUD at acceptable fair market rents. In addition, the HUD Section 202 program helps expand the supply of affordable housing with supportive services for the elderly. It provides very low-income elderly with options that allow them to live independently but in an environment that provides support activities such as cleaning, cooking, and transportation. Langley Village I & II located at 300 North Turner Avenue in Moore is a HUD 202 project that has 51 1-bedroom units for the elderly.

This current system is responding to the basic housing needs of low- and moderate-income persons, but additional efforts are needed by the City. While Moore has no obligation to create a housing authority, it should explore other ways to increase and preserve its supply of affordable housing. Helping to create or financially support a nonprofit affordable housing development corporation should be examined. This type of organization would function independent of the City under the direction of its own board of directors, but would be supported, in part, by the City through the CDBG program.

D.   LIMITED HOUSING TYPES, AFFORDABLE OPTIONS AND NO TRANSITIONAL OR HOMELESS HOUSING

As the latest Envision Moore Plan 2040 Comprehensive Plan points out, Moore's existing housing stock mostly consists of single-family homes, leaving limited options for various housing needs, including the needs for higher-density and mixed-use housing. Affordability is more easily achieved when there is a scale of development that reduces the per unit cost of the land and spreads that out among a greater number of living units. The LIHTC projects at Lyon Estates and The Curve are two examples of this.

The City of Moore should continue to promote a mix of housing unit types in all neighborhoods and new developments for residents of all economic levels. The City should explore the possibility of density bonuses and/or requirements for moderately priced dwelling units in developments exceeding a certain density. Mixed-use developments, where residential is combined with retail, restaurants, and office space, is another way to provide opportunities for new housing types in non-traditional residential locations.

The City of Moore does not receive HUD funding for special housing for the homeless population, and the city does not have a temporary housing program for homeless populations or people experiencing economic transitions. These are unique needs that serve people who have fallen on difficult times and need help transitioning to permanent housing at some point. More should be done to meet this transitional housing need.

E.   HOUSING CONDITION PROBLEMS IN SOME NEIGHBORHOODS

As discussed in the chapter of Demographic and Housing Condition Analysis, neighborhoods with a concentration of Section 8 Voucher households and publicly supported housing programs in Moore have seen higher percentages of their housing units with one or more housing condition issues. This finding might point to the need for a CDBG-funded housing rehabilitation program – not only to improve publicly-assisted dwelling units, but other units occupied by low- and moderate-income households and individuals.

Older neighborhoods in and around the Old Town area are showing signs of blight that, if left unchecked, will negatively impact the economic vitality of the community (Figure 7-1). This situation can potentially provide an opportunity for the City to leverage resources to rehabilitate both owner- and renter-occupied housing. Funding for these types of programs can be provided in the form of a Deferred Payment Mortgages, which has been successfully applied in peer cites.

The City could provide rehabilitation loans or grants to homeowners and landlords to upgrade their housing units to meet minimum housing quality standards. Such programs typically targets neighborhoods where low- and moderate-income households live, but the City should not perpetuate concentrations of lower income households and could conduct the rehabilitation program on a city-wide basis, tying the rehab subsidy to the income of the owners and tenants, to ensure low/mod benefit. This would be a new program for the City of Moore but there are several places in the City where building conditions are in decline.

Map 7-1
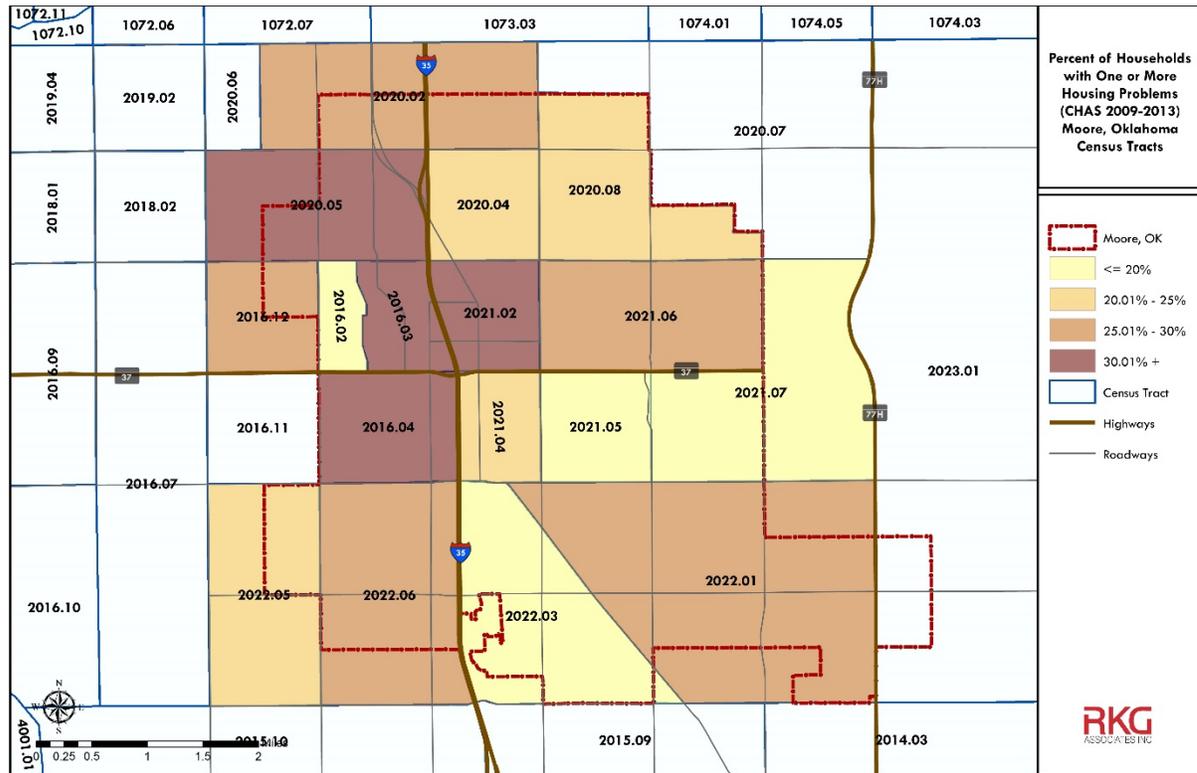
F. LIMITED ACCESS TO RESOURCES AND OPPORTUNITIES IN PUBLICLY SUPPORTED HOUSING NEIGHBORHOODS

The Low Poverty Index, School Proficiency Index, Labor Market Engagement Index, and Environmental Health Index all show lower scores for census tracts with higher percentages of Section 8 Voucher households and publicly supported housing compared to the rest of the City. This is partially due to the clustering of publicly assisted units in certain census tracts or neighborhoods. HUD discourages its recipients from targeting its CDBG funds in a way that encourages such conditions.

RKG believes more of the City's CDBG funds should be used to directly benefit low- and moderate-income households and individuals. That can be done by increasing the financial support for community-based, nonprofit organizations directly serving this population or through project-based initiatives. Providing funding for programmatic services in high-risk neighborhood may be more important than affordable housing development. However, the lack of CHDO's or other nonprofit organizations working in the affordable housing space, may require the City to spearhead an effort to create one or more organizations to build-up the City's capacity to increase the inventory of affordable housing.

G. POVERTY AND LIMITED ACCESS TO RESOURCES AND OPPORTUNITIES FOR THE HISPANIC POPULATION

The Hispanic population shows lower scores for many of the HUD indices which indicate a limited access to resources and opportunities, and they are more likely to live in housing with one or more

condition problems compared to the other racial and ethnic groups. This Hispanic population also constitutes the largest immigrant group in Moore, with many of them having limited English proficiency.

According to RKG's census tract analysis, census tract 2020.05 in the northwestern part of the City is exhibiting conditions of higher poverty rates, concentrations of Hispanic households and housing condition problems. The City should intervene with services and investments to improve conditions for Hispanic households in this part of the community.

H.   LIMITED SUPPLY OF HOUSING FOR PERSONS WITH DISABILITIES

Disability, along with "Renter's Rights, Landlord/Tenant and Other" issues, is the most common basis for housing discrimination complaints, accounting for 39.1% of all complaints originated in Moore between October 2015 and September 2019. The biggest disabilities cited in Moore are ambulatory difficulties and cognitive problem. Both issues speak to potential need to provide special-needs housing throughout the community. These needs may require the provision of housing that is specifically designed to meet ADA standards to accommodate people with ambulatory or other physical disabilities. Cognitive issues could be impacting elderly residents at a higher rate, or there may be housing needs related the group care of people with cognitive or learning disabilities. Small group homes where people can live under the supervision of trained staff is something that could be supported by the City through its CDBG program.

The city should explore the possibility of public/private partnerships to obtain property to establish scattered Tax Credit Housing and/or 811 programs to increase the accessible, affordable, housing stock. The City should also identify and investigate sources of grant funding nonprofit organizations for accessibility modification programs.

I.   LACK OF PUBLIC TRANSPORTATION INFRASTRUCTURE

Though the lack of public transportation in the City was identified as one of the impediments in the 2015 AI, this impediment has remained since the last analysis. The development of an inter-jurisdictional public transit system has been envisioned by the newly established Regional Transit Authority of Central Oklahoma, but it is estimated to take around 10 years to realize this plan. It is very difficult for a small city to address this need effectively without the partnership of other nearby communities to share the cost. The creation of a regional transit authority is a positive step that may help address this problem over the long-term. However, there are transit initiatives that are starting to address transportation challenges for elderly residents in a limited way.

J.   LIMITED PUBLIC FUNDING AND PROGRAMS FOR AFFORDABLE HOUSING

The City has begun providing annual funding to the Metropolitan Fair Housing Council of Oklahoma (MFHC) from its annual CDBG budget, starting in Fiscal Year 2015-16. Currently, MFHC is the only HUD-qualified full-service private nonprofit fair housing enforcement and advocacy organization in Oklahoma. The annual allocation also increased from $4,000 between Fiscal Years 2015-2018 to $5,500 in Fiscal Year 2019. The City's annual CDBG allocation to the Metropolitan Fair Housing Council of Oklahoma is helping to further fair housing choice in Moore. However, the CDBG funds that MFHC receives accounts for less than 2% of the total City's CDBG allocation between Fiscal Years 2015 and 2019. Nearly

Historically, the City has spent the majority (65%/$1.02 million) of its CDBG funds ($1.58 million) over the past five years on infrastructure projects such as water and sewer line improvements. While such

projects can be CDBG-eligible when they are benefiting low- and moderate-income neighborhoods, they are an indirect benefit, unless they are facilitating the construction of decent, safe, and affordable housing or some other project. This is a municipal infrastructure need that can be financed through other sources (e.g., general fund or enterprise fund).

There are many more opportunities for the City to redirect their CDBG funds to affordable housing-related activities and those should be explored over the next five years.   There still is no local nonprofit development corporation or affordable housing provider, other than Habitat for Humanity, which builds a limited number of affordable homes each year through donations of materials and labor.   It is recommended that the City increase its annual allocation to the Metropolitan Fair Housing Council of Oklahoma, as well as include other community-based private nonprofit organizations related to affordable housing development or the provision of services to benefit low- and moderate-income person.

J.   INCREASE FAIR HOUSING EDUCATION AND ENCOURAGE REAL ESTATE SALES AND PROPERTY MANAGEMENT COMPANIES TO INCLUDE FAIR HOUSING LANGUAGE IN REAL ESTATE LISTINGS

Based on RKG's review of real estate website, it appears that most of Moore's real estate firms engaged in the sale and rental of residential properties do not display or promote statements in accordance with fair housing laws. The National Association of Realtors requires that their members adhere to the following practices:

- Provide equal professional service without regard to the race, color, religion, gender (sex), disability (handicap), familial status, national origin, sexual orientation or gender identity of any prospective client, customer, or of the residents of any community.
- Keep informed about fair housing law and practices, improving my clients' and customers' opportunities and my business.
- Develop advertising that indicates that everyone is welcome, and no one is excluded; expanding my client's and customer's opportunities to see, buy, or lease property.
- Inform clients and customers about their rights and responsibilities under the fair housing laws by providing brochures and other information.
- Document efforts to provide professional service, which will assist members in becoming more responsive and successful REALTORs.
- Refuse to tolerate non-compliance.
- Learn about those who are different from me and celebrate those differences.
- Take a positive approach to fair housing practices and aspire to follow the spirit as well as the letter of the law.
- Develop and implement fair housing practices for my firm to carry out the spirit of this declaration.

The City of Moore, in cooperation with the Metropolitan Council on Fair Housing, should provide annual reminders to Realtors and property management firms that they should promote Fair Housing practices and provide affirmative statements in their marketing materials, brochures, website and all their real estate listings.

In addition, more funding is needed to conduct direct outreach and education on Fair Housing Issues, including tenant rights, as a lot of the low-income population do not have direct access to the internet. There is also a need for self-help services and mediation/legal services for the "working poor" population who do not qualify for low-income benefits. More resources are needed to provide such services which currently do not exist.