

CITY OF AMARILLO
COMMUNITY DEVELOPMENT AND HOUSING
GUIDE FOR CITIZEN PARTICIPATION



REVISED MARCH 2012

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CITIZEN PARTICIPATION AND INVOLVEMENT

The CDBG, HOME and ESG programs involved in the Consolidated Plan are intended to help improve the living environment of low and very low income neighborhoods and those experiencing slum and blight. The ultimate goals are to "extend and strengthen partnerships among all levels of government, for profit and non-profit organizations to enable them to provide decent housing, establish and maintain a suitable living environment, and expand economic opportunities" for citizens of Amarillo, especially those with low and very low incomes. To best do this, it is important to know what the individuals affected by the CDBG, HOME and ESG activities think about the programs. Ideas and suggestions from citizens are important and worthwhile, and without them the programs will be less than successful. Citizen involvement is a partnership between the City of Amarillo and the residents of the neighborhoods involved in the programs. In addition, this collaborative effort extends to the private sector and non-profit organizations who have resources and programs to achieve the consolidated planning strategies. It is the responsibility of the City to provide open access and opportunities for participation so that any citizen or group of citizens may express themselves about the consolidated planning process. Importantly, it is the responsibility of citizens to participate and to become involved. Otherwise any citizen participation process is ineffective.

Within the federal guidelines, the activities to be undertaken are ultimately determined by the Amarillo City Council. To make wise decisions about how to use federal money, the City Council needs timely and adequate information from Amarillo citizens about local concerns, problems and needs. It is the policy of the Amarillo City Council to encourage maximum citizen participation as a means to improve the responsiveness of the CDBG, HOME, and ESG programs to community needs.

This Community Development Guide for Citizen Participation is adopted to help citizens understand how and when to most effectively contribute to the consolidated planning process. There are three fundamental stages in the process in which citizens may contribute to discussion, priority settings, and decision making. These stages are planning and development, implementation, and assessment.

The citizen participation process has the following basic goals:

1. Encourage citizens to participate in local government.
2. Provide citizens, especially those of low and very low income, opportunities to actively collaborate in the planning, development and assessment of the consolidated planning process.
3. Ensure all aspects of the consolidated planning process are conducted in an open manner.
4. Provide City officials with information regarding citizens' perceptions and priorities.

COMMUNITY DEVELOPMENT ADVISORY COMMITTEE

The City Council established the Community Development Advisory Committee (CDAC) in 1975. The CDAC composed of eleven (11) citizens, is responsible for overseeing the CDBG,

HOME and ESG programs. The City Council appoints two citizens from each of four (4) geographic areas, plus two members selected at large but residing in the identified Community Development Target Area. A chairperson is selected at large. The members and chairperson serve staggered two year terms which begin the first of January. The geographic areas from which members are selected are identified on Map A. Efforts are made to appoint citizens who will be representative of the persons most affected by CDBG, HOME and ESG activities.

The CDAC meets, in regular session, the second week of each month when necessary at the Downtown Library, 413 E. 4th Street, beginning at 7:00 p.m. The Downtown Library is accessible to persons with disabilities. Notices of the monthly meetings are posted a minimum of 72 hours prior to the meeting. Notices are placed in the front window of City Hall and posted on the City's website.

If an individual, group or organization has a particular request or concern to bring before the CDAC, a written request for time on the agenda should be submitted to the Community Development Department Administrator no later than three weeks (15 working days) before the scheduled meeting. Citizens are encouraged to appear before the CDAC to discuss a concern or request. The recommendations developed by the CDAC regarding the CDBG, HOME, and ESG programs are submitted to the City Council for final approval. Citizens interested in items submitted to the City Council are encouraged to attend the meetings and express their views and comments.

The roles and responsibilities of the CDAC are as follows:

1. The CDAC acts in an advisory role to the City Council on policy decisions relating to the consolidated planning process for the CDBG, HOME and ESG programs.
2. The CDAC coordinates citizen participation.
3. The CDAC reviews and makes recommendations to the City Council on allocations of CDBG, HOME and ESG funding.

PLANNING AND DEVELOPMENT

Planning and development is the phase in which involvement by citizens is most crucial and effective. Citizens may directly contribute to the development of the CDBG, HOME and ESG programs. Expressions of citizens' priorities are often the deciding influence when statistics and technical evaluation identify several strategies and program alternatives.

The planning process for developing the five year Consolidated Plan is coordinated by the Community Development Department. The five year plan promotes the concept that planning and programming can be accomplished through a unified and comprehensive framework which opens partnership opportunities for collaboration and collective problem-solving. Consensus building is critical in establishing workable priorities and strategies which must be implemented by a variety of public and private resources. Successful implementation of strategies will occur only if there is broad based support and a sense of involvement on the part of all of the participants.

During the consultation phase of the Consolidated Plan, a series of working groups will be established to address primary elements of the Plan. Composition of the working groups will be targeted toward a variety of organizations, individuals as consumers or participants, community and business leaders,

private investors, and neighborhood residents. The working groups participants will be invited to contribute to the development of their area of experience or expertise. At the same time, boarder participation will be encouraged from the general population by advertising the date of meetings and the purpose of the working group. The Community Development Department will provide staff support to the working groups. Members of the CDAC will assist in facilitating the meetings. At a minimum the working groups will focus on the following areas of study:

- Homelessness
- Special needs populations, such as youth, the elderly, frail elderly, persons with disabilities, persons with mental illness or retardation, persons living with AIDS, and persons suffering from substance abuse
- Renters and landlords
- Homeowners and homebuyers
- Anti-poverty strategies
- Neighborhood and development services

In addition to working groups, citizens will be involved in the planning process through a series of surveys and questionnaires. Random telephone surveys may be used to help establish an overall community consensus for community development needs and priorities. Such random surveys help to eliminate bias which may result from open community meetings in which special interest groups may lobby for special programs.

The needs of homeless persons and special populations will be assessed through questionnaires targeted at service providers and consumers. Annually, a "point-in-time" survey will be made at all of the homeless shelter populations. A special effort will be made to gather information regarding the numbers of unsheltered homeless persons and their special needs. The City participates as an active member of the Amarillo Coalition for the Homeless which consists of over 45 service providers as well as homeless individuals. The Coalition will be invited to consult on the needs, the development of strategies and the implementation effective programs designed to transition homeless individuals and families to self-sufficiency.

The results of the data collection, working group consensus, and surveys will be assimilated into a proposed Consolidated Plan and presented for public comment and review. The CDAC will conduct at least one public meeting to allow citizens the opportunity to comment on the entire plan. At this public meeting, recommendations for strategies and priorities will be established. These five year strategies and priorities will be the basis for decisions made to fund projects each year.

Annually, the City of Amarillo prepares an Annual Action Plan (AAP) which identifies how CDBG, HOME, and ESG funds will be allocated to projects. The development of the annual plan generally coincides with the preparation of the City's Budget. The annual planning process generally begins in the winter and is concluded by mid July. The Consolidated Plan or the AAP must be submitted to the Department of Housing and Urban Development by mid August of each year.

The CDAC has the initial responsibility for developing the annual program. Within funding limitations, the CDAC must decide which activities will best meet the priority strategies and contribute to the revitalization of Amarillo's declining neighborhoods. Development of the AAP is discussed at community

meetings. The number of the meetings to be held is determined each year and advertised as part of the development process. The meetings are held either at neighborhood centers or at the Downtown Library which is centrally located to neighborhoods in which concentrations of CDBG, HOME and ESG activities are being carried on or may be proposed. All meetings are held in buildings accessible to persons with disabilities.

Taking into consideration the information and recommendations from the working groups, surveys and project requests, the CDAC conducts a Public Hearing to recommend adoption of the Consolidated Plan and/or the AAP. This hearing is the culmination the planning process. A Notice of Public Hearing is posted at City Hall and in City's website 72 hours prior to the hearing. Following the action by the CDAC, the proposed Consolidated Plan and AAP are made available for a public comment period. Copies are placed at the Reference Desks at the Amarillo Public Libraries and in the Community Development office, Room 104 of City Hall for review by interested citizens. Documents will be available on the Internet through the City's web page at www.amarillo.gov.

At the conclusion of the public comment period, the Consolidated Plan and/or AAP is considered in a final Public Hearing conducted by the Amarillo City Council. The purpose of the public hearing is to consider the recommendations adopted by the CDAC and all comments received during the comment period. Citizens are given a final opportunity to comment on the Consolidated Plan and/or AAP including those activities or projects not recommended for funding.

IMPLEMENTATION

It is difficult to develop a mechanism for direct citizen involvement in the implementation of the CDBG, HOME and ESG programs. The majority of projects funded are of the type which do not lend themselves to citizen involvement. Projects such as street and park improvements and construction projects have predetermined implementation steps that are not affected by citizen involvement. Although the level of participation in the implementation phase cannot be as direct as in the planning phase, efforts are made to provide the opportunity for citizen input in as many programs as possible.

The major vehicle for participation during the implementation phase is through the CDAC. During CDAC meetings, the status of certain activities may be reviewed. Any individual, group or organization which desires to comment on the implementation of an activity may do so at the CDAC meeting. By following the City of Amarillo boards and commissions instructions and request to speak whenever feasible, the residents of neighborhoods affected by a project will be consulted in the project's implementation. Activities which might be subject to citizen involvement are the location of a community center or day care center; areas needing special code enforcement activities; or the development of eligibility requirements for a new program.

Special outreach and marketing will be used to maximize the participation of Amarillo's residents in the CDBG, HOME and ESG funded projects. The availability of such programs as housing rehabilitation assistance, transitional housing for homeless persons, and public service projects, such as subsidized child care, will be advertised and targeted to lower income neighborhoods. These outreach efforts will result in successful and timely implementation of projects.

ASSESSMENT

The final phase of citizen participation is the assessment of performance. Ongoing monitoring and evaluation procedures are established to ensure projects meet national goals and are effectively addressing the Consolidated Plan priority strategies. In assessing the effect a project has on neighborhood conditions, comments from neighborhood residents are an important contribution. Citizens are

encouraged to attend CDAC meetings and express their ideas or concerns about activities. The CDAC is charged with monitoring the funded activities to help ensure appropriate and timely performance. Those residents who attend the CDAC meetings to discuss project performance provide the CDAC representatives with valuable information. If at any time a project is not achieving the stated goals and strategies, the CDAC has the prerogative to recommend program changes.

Annually, the City reports performance to HUD. The reporting process is an extensive evaluation of the status of approved projects and the accomplishments towards meeting priority strategies of the consolidated plan. A Consolidated Annual Performance and Evaluation Report (CAPER) is submitted by December 30th of each year. Prior to submission, this report will be available for a 15 day public comment. Copies of the report will be placed at the Reference Desks at the Amarillo Public Libraries and in the Community Development office. A notice of availability will be published in the Amarillo Globe News. A copy will be available on the web page at www.amarillo.gov/?page_id=119.

At the conclusion of the 15 day comment period the annual report will be discussed in a public hearing before the CDAC. The public hearing will be conducted in the evening beginning at 7:00 p.m. in the Downtown Library. The purpose of the public hearing is to give citizens the opportunity to comment on the performance or effectiveness of the CDBG, HOME or ESG programs. A summary of comments submitted in writing or made at the public hearing will be included with the submission of the report to HUD.

SUBSTANTIAL CHANGES

Occasionally, amendments or changes may be needed to the Consolidated Plan. The City will give citizens the opportunity to participate in the planning and development of any substantial change in five (5) year strategies or priorities and annual projects. The CDAC will be responsible for soliciting views and comments from affected or interested persons before developing a recommendation regarding the proposed change.

The City has adopted a local criteria for what will constitute a substantial change to the Consolidated Plan and to the AAP. The changes described below will be subject to the citizen participation process as described in this guide:

1. A decision to change the amount of funding over \$25,000 for an existing project;
2. Any change in priority strategies which may affect the activities to be funded from CDBG, HOME, or ESG funds;
3. Any new activity proposed for CDBG, HOME, or ESG funding;
4. Any revision in an approved activity which results in a change from one eligible activity to another or a change in the location, scope or beneficiaries of the activity.

PUBLIC INFORMATION

Before individuals, groups, organizations or agencies can become involved in any phase of the consolidated planning process adequate information must be made available. It is the responsibility of the City to inform citizens of program requirements, goals and strategies, and major events related to the consolidated planning process, the CDBG, HOME and ESG programs. The Community Development Department is primarily responsible for this public information. All information regarding program requirements, project files and other records related to Amarillo's use of assistance under the programs are available in the office of the Community Development. The federal regulations establish a five (5) year

minimum requirement for information retention. Any person wishing to inspect or review any of this information should visit the Community Development office. Confidential information related to beneficiaries receiving CDBG, HOME or ESG assistance is subject to the protections afforded under the Privacy Act.

The residents of Amarillo are informed of all meetings and hearings held on any phase of the consolidated plan process. Every effort is made to reach people who may be most affected by ongoing or proposed projects to encourage their involvement in the decision-making process. The agendas are posted out front at City Hall and posted on the City's website 72 hours prior to meeting.

TECHNICAL ASSISTANCE

The goal of involving citizens in the many phases of the consolidated planning process must be supported by providing citizens with adequate knowledge and information about the CDBG, HOME and ESG programs. Without technical assistance, citizens may not be adequately prepared to participate in or benefit from the programs.

Appropriate assistance is provided by the Community Development Department to enable citizens, organizations, or groups of low and very low income persons to participate in the planning, implementation and assessment of the CDBG, HOME and ESG programs. The Community Development staff provides assistance in developing proposals, identifying needs, collecting data, or estimating project costs. Technical assistance may also involve developing strategies for specific proposals or determining priorities. Technical assistance is available on an individual basis upon request or may be provided through workshops held periodically during the year. At a minimum, the Community Development Department provides the following information:

- A. Amount of CDBG, HOME and ESG funds expected to be available for projects.
- B. Range of activities which may be funded.
- C. Kind and location of activities previously approved.
- D. Consolidated planning process and schedule.
- E. Role of citizens.
- F. Summary of other program requirements.

TRANSLATION SERVICES

The Community Development Department encourages participation from all Amarillo residents. To reach the maximum number of people, special efforts may be necessary to provide translation services to non-English speaking citizens attending public meetings. The hearing-impaired resident may also need special translation assistance.

Public hearing notices instruct those persons who need translation services to contact the Community Development Department. Upon request, translators for non-English speaking and/or hearing-impaired persons will be provided. The Community Development Department has a standing contract with the Panhandle Council for the Deaf to provide translators with a minimum 24 hour notice. The Community Development staff provides translation services for Spanish speaking persons who contact the office.

Those residents who wish to attend the monthly CDAC meetings or Community Planning meetings may also request translator services by giving the Community Development office at least two business days notice. Copies of the Consolidated Plan and other documents will be made available in large print or on DVD upon request.

COMPLAINTS

Complaints or concerns regarding the CDBG, HOME or ESG programs should primarily be directed to the Community Development Department Administrator. However, nothing precludes a person from expressing a concern or complaint to the Assistant City Manager, the City Manager, the Amarillo City Council, or the Department of Housing and Urban Development.

Citizens may file an oral or written complaint with the City of Amarillo. The Community Development staff will record an oral complaint on special citizen complaint forms to be retained in the official files. The staff will note the name and address of complainant, the nature of the concern, the initial response given, any follow-up response, and if appropriate, any referral of the complaint to other departments or agencies. The Community Development Department will respond to written complaints within 30 days of receipt. The complaint and response will be documented in the Community Development Department citizen comments files and reported to Department of Housing and Urban Development as part of the annual reporting process.

Major concerns or problems are best expressed in writing. This helps prevent any misinterpretation of the concern or the facts. Therefore, citizens are urged to address their concerns in writing to:

Community Development Department Administrator
City of Amarillo
P.O. Box 1971
Amarillo, TX 79105-1971
Telephone: (806) 378-3023
Fax: (806) 378-9389
email: james.allen@amarillo.gov

Complaints may be directed to the Department of Housing and Urban Development.

Department of Housing and Urban Development, Region VI
801 Cherry Street, Unit #45, Suite 2500
Fort Worth, TX 76102
Telephone: (817) 978-9000
Fax: (817) 978-9289
Fax Contact: (817) 978-9252
TTY Number: (817) 978-9273
email: swpublicinformationofficer@hud.gov.

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.....2020 ANALYSIS OF IMPEDIMENTS

TO FAIR HOUSING

CITY OF AMARILLO

For Questions or Comments

**Please Call the Community Development Department
806-378-3098**

Or Come by 808 South Buchanan Street - Amarillo, Texas 79101

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CITY OF AMARILLO
2020 ANALYSIS OF IMPEDIMENTS
To FAIR HOUSING

Section 1: Introduction and Executive Summary

Entitlement communities that receive direct federal funding from the U.S. Department of Housing and Urban Development (HUD), including Community Development Block Grant (CDBG), HOME Investment Partnership, and Emergency Solutions Grants (ESG) funds, must conduct a study of existing barriers to housing choice as part of their Consolidated Planning process. This required study is referred to as the “Analysis of Impediments” or AI. Final regulations regarding the content of the study were published in July of 2015 and applicable beginning in January, 2017.

Jurisdictions are required to complete an AI to do the following:

- 1) Identify impediments or barriers to fair housing choice within the jurisdiction
- 2) Take appropriate actions to overcome the effects of any impediments identified, and
- 3) Maintain records reflecting the analysis and actions taken in this regard.

Impediments are defined as “any actions, omissions, or decisions taken or which have the effect of restricting housing choices or the availability of housing choices because of race, color, religion, sex, disability, familial status, or national origin.” The AI is a comprehensive review of a jurisdiction’s laws, regulations, administrative policies, procedures, and practices. It requires an assessment of how those laws, etc., affect the location, availability, and accessibility of housing; and an assessment of public and private conditions affecting fair housing choice. Jurisdictions are recommended to conduct or update their AIs at least once every three to five years (consistent with the Consolidated Plan cycle) and also to review and revise as needed annually with their One-Year Annual Plans. The AI is also made available for public review and comment.

The City of Amarillo conducted an analysis of impediments to housing choice during the development of the 2010-2014 and 2015-2019 Five-Year Consolidated Plan cycles.

1.1 Objectives

The AI update has three major objectives in accordance with HUD:

1. Identify impediments to fair housing choice within the City of Amarillo
2. Recommend appropriate actions to overcome the effects of identified impediments
3. Serve as a formal record reflective of the analysis and actions.

1.2 Sources and Methods

The AI methodology included: development of a community profile; interviews with community stakeholders; review of fair housing law and public policies; analysis of fair housing complaints; and collection of data and analysis from numerous sources including the U.S. Census Bureau, Wichita Appraisal District, City of Amarillo municipal departments, Wichita County, non-profit organizations, state agencies, and others. When available, data and analysis includes comparisons between the City, Wichita County, other jurisdiction of similar size, and the State of Texas.

Where possible, data research and review includes a longitudinal trend analysis over 10 or 20 year periods, including analysis of housing market characteristics such as household income, race, cost, and tenure. The analysis includes an assessment of local, state, and federal fair housing laws, policies, legislation, and development regulations affecting affordable housing development, discrimination complaints, and housing programs offered by the City.

The Community Profile offers a snapshot of the City as the base for understanding the City’s demographics, housing market, housing conditions, and other factors that impact housing choices.

The City of Amarillo is an active participant with contact or membership in several local, regional, state, and national organizations. Information from the following agencies and organizations was either directly obtained or reviewed during the development phase of the 2020-2024 Consolidated Plan, 2020 Annual Action Plan, and the 2020 Analysis of Impediments:

Amarillo Public Transit	Panhandle Community Services
Amarillo Chamber of Commerce	Panhandle Regional Planning Commission
Amarillo Community Development Dept	Panhandle Transit Services
Amarillo ISD	Panhandle Workforce Development
Amarillo Parks Department	Potter-Randall Appraisal District
Amarillo Police Department	Potter County
Amarillo Public Health Department	Texas Health & Human Services Dept
Goodwill Industries	Texas State Data Center
HUD CPD staff	Texas Workforce Commission
HUD FHEO staff	

Any remedial actions identified in this report represent recommendations by the consultant to the City to address impediments based on HUD Fair Housing guidance, experience, and best practices often utilized in other jurisdictions. The City is not required or obligated to implement these recommendations and may choose other options to address any identified impediment. Some remedial actions consist of conceptual guidance and would require additional research, cost analysis, feasibility, and design should the City choose to implement them.

1.3 Summary of Impediments and Concerns and Recommendations for Remedial Actions

Based on a detailed analysis of the information collected, potential impediments and concerns were identified in the following categories – Socioeconomic Factors, Real Estate Factors, Public Policy Factors, and Banking/Finance Factors. Recommendations for remedial actions were

identified for each. Some of the recommended remedial actions are conceptual frameworks for addressing existing or possible future impediments or concerns.

1) Socioeconomic Factors

- a. **Concern:** Based on the age, location, and value of housing in the City, it can be reasonably assumed that much of the housing occupied by lower income residents is of a poor quality and condition.

Remedial Actions: The City should continue and expand its efforts to provide funding for the rehabilitation or reconstruction of housing units occupied by lower income and minority residents. The City should support efforts of local non-profit organizations and private developers to expand their role in the provision of adequate and affordable housing.

2) Real Estate Factors

- a. **Concern:** The participants of the Amarillo Public Housing Authority report an on-going difficulty finding units to rent that meet HUD's Fair Market Rent. This is a problem reported nationally by Public Housing Agencies (PHAs) and is considered by most to be the result of several factors, including low Fair Market Rents, dissatisfied Section 8 landlords, lack of funds for tenant damages, substandard housing units, and the lack of adequate vacant rental units.
- b. **Remedial Actions:** The current approved Fair Market Rent value appears sufficient for a Voucher holder to find an affordable rental unit in the Amarillo area, yet, the rental market and lack of suitable vacant units may limit the availability of units. The City should continue to monitor this issue and develop programs to assist in bringing rental properties to standard condition, as well as developing new rental construction units to provide affordable housing that meets minimum housing standards.

3) Public Policy Factors

- a. No significant barriers to affordable housing were found to exist in the available public policies, however, information provided indicates a need for a regular review of development processes and costs.

There are no public policies that limit or affect the return on residential investments. However, although there does not appear to be any overt public policy barriers to affordable housing, regular reviews of taxes, fees, building codes, and zoning regulations continue to be necessary to ensure that unanticipated barriers do not develop. Additionally, this analysis is necessary to gauge what impact any future changes might have on accessibility to housing.

- b. **Concern:** Community Awareness – The general public are oftentimes unaware of their rights under Fair Housing laws. Discriminatory acts are often subtle and not easily detectable. People who experience discrimination are unaware of how simple it is to report the incident and do nothing. Providers of services (landlords, lenders, leasing agents) are sometimes confused or unclear on what the law requires. A review of advertising media (television, radio, newspapers) indicates that local housing providers, lenders, and insurers could be more diligent in including fair housing logos, equal opportunity statements, and diverse human models, and in offering bilingual advertising and services.

Remedial Actions: Knowledge and education of Fair Housing law and the community's available resources and assistance is critical. It is the Affirmative Marketing Goal of the City of Amarillo to ensure that organizations and individuals who normally might not apply for grants or for assistance because of their race, color, religion, sex, disability, familial status, or national origin know about the availability of assistance and have the opportunity to apply. Therefore, public notices should be placed in the local newspaper, public service announcements should be advertised through the local television stations, signs should be posted in public places, and public hearing notices should be posted on the City's bulletin boards at City Hall and on the City's website. Public hearings held to inform the general public when funds are available and what projects will be funded should include specific information on fair housing. The City should enhance its participation in Fair Housing Week and actively advertise and publicize information in low-income and minority impacted neighborhoods. Additionally, the City should notify local public service organizations regarding public hearings and meetings. Further, the public hearings should be routinely scheduled during City Council meetings which are televised on the local public access channel for viewing by the public. The City reported it has not received any fair housing complaints in recent years and should continue to monitor this issue and utilize training and testing to evaluate the occurrence of possible fair housing issues.

- c. **Concern:** Due to a continued lack of federal funding, the waiting list to receive Housing Choice Voucher rental assistance is approximately 48 months. Priorities are provided for working applicants, elderly individuals/families, and disabled individuals/families.

Remedial Actions: The City has no direct influence on the federal funding situation but should continue to be actively supportive of any efforts that could be made to relieve the funding situation.

Section 2: Amarillo Community Profile

2.1 Introduction:

The Community Profile provides a review of the most currently available information on demographics, income, CDBG eligible Census Tracts, employment, English proficiency, education, public transportation, and RCAP-ECAP data/analysis. A detailed discussion of the City's Housing Profile is contained in Section 3. Statistical data was gathered from the 2018 American Community Survey (ACS) 5-Year Estimates; 2000, 2010, and 2019 U.S. Census estimates; and other resources. The City also considered the following information and data during the review:

- Fair Housing Planning Guides
- Analysis of Amarillo's housing stock
- Minority and low-income concentrations
- Availability and usage of Housing Choice Vouchers
- Availability and usage of Public Housing units
- Availability of financial resources
- Poverty rates and trends
- Lead-based paint hazards
- Fair Housing Ordinance
- Existing zoning and building code practices
- Location of affordable housing
- Incidence of housing complaints
- Property Tax policies
- Private lending practices
- History of Housing Choice Voucher Program Landlord participation
- Transportation, shopping, and other services
- City policies and procedures

The following sections provide an analysis of the identified components of the Community Profile:

- **Demographics** – provides data and analysis of population growth, racial and ethnic diversity, and household/family structure
- **Income** – identifies income sources and poverty levels
- **CDBG Eligible Census Tracts** – identifies the HUD-defined low-income areas/neighborhoods of the city based on census data
- **Employment** – examines unemployment and underemployment rates and occupational trends
- **English Proficiency** – discusses the use of English and other languages
- **Education** – discusses impact of English Proficiency and educational levels
- **Public Transportation** – examines availability and access of public transit and transportation systems
- **RCAP-ECAP Analysis** - analysis of the opportunities residents are afforded in “racially or ethnically concentrated areas of poverty”

2.2 Demographic Data

Amarillo is a city in and the county seat of Potter County, Texas. It is the 14th most populous city in Texas and the largest city in the Texas Panhandle. A portion of the City extends into Randall County. It is the principal city of the Amarillo Metropolitan Statistical Area, which encompasses all of Potter and three neighboring counties.

2.2.1 Population Trends: Based on the 2010 census, its reported population was 190,695. It increased by 3% to 196,570 in 2015. The July 1, 2019 census data estimates the City's population increased by 4.6% during the last decade at 199,371. During this same time period, Potter County population decreased by 3%, the Texas state population increased by 14.1%, while the national population increased by 6%.

Demographics	Base Year: 2009	Most Recent Year: 2015	% Change
Population	190,695	196,570	3%
Households	69,523	74,770	8%
Median Income	\$41,708.00	\$47,735.00	14%

Table 1 - Housing Needs Assessment Demographics

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

2.2.2 Racial and Ethnic Diversity: The US Census 2019 data indicates the racial profile of the city includes 82.5% White, 6.6% African American, .5% Native American, 4% Asian, and 3.7% from Native Hawaiian/Pacific Islander and two or more races. Across all races, 32.3% of the population identified as Hispanic or Latino origin, less than Potter County at 39.1% and less than the state-wide level of 39.6%, but greater than the US at 18.3%

The figure below shows the change from 2010 in comparison to Potter County, Randall County, and the State of Texas.

Table 1.0. Change in Population by Race since 2010

Percent of Total Pop	Amarillo		Potter County		Randall County		Texas	
	2010	2019	2010	2019	2010	2019	2010	2019
White	77.02%	82.5%	69.81%	79.4%	88.88%	91.5%	73%	78.8%
Black	6.62%	6.6%	10.21%	11.1%	2.37%	3.5%	13%	12.8%
Other Races	15.58%	8.2%	19.97%	9.4%	8.60%	5.0%	14%	8.3%
Hispanic Ethnicity	28.78%	32.30%	35.26%	39.1%	16.38%	23.1%	38%	39.6%

Source: 2010 and 2019 US Census

Current census data indicates 87.9% of the City's residents were born in the United States, with 66.14% having been born in Texas. Approximately 8.35% of residents are not US citizens. Of those born in the United States, the largest percentage are from Latin America.

2.2.3 Household/Family Structure: In many communities, female-headed households and female-headed households with children experience more difficulties than other household types when seeking affordable housing. This is often evidenced by comparing household type to the existence of fair housing complaint data. These household types also tend to be of lower-income and, thus, even further challenged in paying rents or mortgages.

The 2014-2018 American Community Survey indicated 75,563 households (a person or groups of persons occupying a single dwelling), with an average of 2.61 persons per household, comparable to the Texas state average of 2.5.

The age of Amarillo’s population is spread out with 71.55% being between the ages of 15 to 64. The median age is 33.9 years.

Table 1.2. Age Distribution

Age Range	Percent
0-5	11.3
5-14	22.7
15-19	10.15
20-24	10.55
25-34	15.75
35-44	12.35
45-54	11.35
55-64	11.4
65-84	10.8
85+	1.65

2.3 11.5% Income Data

Amount of household income plays a very important factor in securing (rental and owner-occupied) and maintaining housing. Income limitations are often the most critical factor in a household’s selection of housing. The 2018 median income for a household in the city was \$512,543. More than 9,900 households pay 30%-50% of their income to housing costs; more than 14,000 households pay more than 50% of their income to housing costs; and more than 7,600 pay 80-100%.

This table shows the number of households with incomes less than 100% of the area’s median family income.

Table 1.3. Household Income and Household Type

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	9,855	9,985	14,005	7,650	33,270
Small Family Households	3,160	3,150	5,535	3,490	17,630
Large Family Households	775	1,080	1,285	920	2,745

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Household contains at least one person 62-74 years of age	1,615	1,730	2,545	1,430	6,105
Household contains at least one person age 75 or older	944	1,695	1,675	665	2,625
Households with one or more children 6 years old or younger	2,295	2,260	2,755	1,565	3,380

The 2018 census estimates indicated that 15.1% (30,105 individuals or 1 in 6.6 persons) of Amarillo’s residents had incomes below the national poverty level. Comparatively, the Texas state rate was 14.9%, and the national rate was 11.8%. These households will experience severe difficulties in locating housing that is affordable and suitable for their housing needs.

Table 1.4.

Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	1,870	1,810	1,075	4,755	550	560	1,185	2,295
Large Related	495	390	50	935	169	400	155	724
Elderly	855	650	360	1,865	975	805	519	2,299
Other	2,190	1,600	865	4,655	550	275	480	1,305
Total need by income	5,410	4,450	2,350	12,210	2,244	2,040	2,339	6,623

Cost Burden > 30%

Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	1,640	685	30	2,355	520	245	230	995
Large Related	310	10	10	330	165	185	0	350
Elderly	605	320	125	1,050	655	370	169	1,194
Other	1,855	465	20	2,340	380	200	60	640
Total need by income	4,410	1,480	185	6,075	1,720	1,000	459	3,179

Table 2 – Cost Burden > 50%

Data Source: 2011-2015 CHAS

Income and Disproportionate Need: For the purpose of this document, “a disproportionately greater need” exists when:

(1) The percentage of persons in a category of need who are members of a particular racial or ethnic group is 10 percentage points higher than the percentage of persons in the category city-wide;

AND

(2) The percentage of total households for the racial or ethnic group constitutes 10 percent or more of the total city-wide households.

The 2012-2016 American Community Survey (ACS – Source U.S. Census) also known as the CHAS data is the latest reliable data provided by HUD to demonstrate housing problems by income and race/ethnicity. The housing problems include incomplete kitchen, incomplete plumbing facilities, cost burden greater than 30 percent, and overcrowding (more than 1 person per room).

The tables below demonstrate the disproportionate need based on race and income across the income levels 0-30% AMI, 30-50% AMI, 50-80%, and 80-100% AMI. A summary of this data indicates:

- 1) For 0-30% AMI, the Asian population is 13% percentage points above the City-wide average of 80%, with 235 of 254 households report having one of the four housing problems. For American Indians, Alaska Natives, 93%, or 54 out of 58 households, report problems. Ten households of Pacific Islanders, or 100%, report problems.
- 2) For 30-50% AMI, Black/African-Americans and Asians, 80% of households report problems compared to 68% for the city as a whole. 100% of Pacific Islanders (30 households) report problems.
- 3) For 50-80% AMI, compared to the 39% for the city as a whole, 54% of the Asian population reports a disproportionate need, and 100% of the Pacific Islander population reports a problem.
- 4) For 80-100% AMI, compared to the 17% for the city as a whole, 26% of Black/African-Americans report a house problem.

Table 1.5. Disproportionate Need Based on Race and Income – 0-30% AMI

Legend

10 percentage points or more above Jurisdiction as whole
8 or 9 percentage points above Jurisdiction as whole

0%-30% of Area Median Income: Disproportionate Greater Need

Housing Problems	Has one or more of four housing problems	Total Households	Percent of Total Households <i>Has one or more of four housing problems</i>	Percentage Points above or below Jurisdiction as a whole	Percent of Total Jurisdiction Households	Disproportionate Greater Need? <i>10 percentage points or more <u>above</u> Jurisdiction as a whole, <u>AND</u> representing 10 percent or more of total Jurisdiction households</i>
Jurisdiction as a whole	7,845	9,855	80%	Reference	Reference	N/A
White	3,770	4,925	77%	-3%	50%	No
Black / African American	1005	1,265	79%	0%	13%	No
Asian	235	254	93%	13%	3%	No
American Indian, Alaska Native	54	58	93%	13%	1%	No
Pacific Islander	10	10	100%	20%	0%	No
Hispanic	2620	3,159	83%	3%	32%	No

Table 13A - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Table 1.6. Disproportionate Need Based on Race and Income – 30-50% AMI

Legend

10 percentage points or more above Jurisdiction as whole
8 or 9 percentage points above Jurisdiction as whole

30%-50% of Area Median Income: Disproportionate Greater Need

Housing Problems	Has one or more of four housing problems	Total Households	Percent of Total Households <i>Has one or more of four housing problems</i>	Percentage Points above or below Jurisdiction as a whole	Percent of Total Jurisdiction Households	Disproportionate Greater Need? <i>10 percentage points or more <u>above</u> Jurisdiction as a whole, <u>AND</u> representing 10 percent or more of total Jurisdiction households</i>
Jurisdiction as a whole	6,775	9,980	68%	Reference	Reference	N/A
White	3,805	5,905	64%	-3%	59%	No
Black / African American	730	910	80%	12%	9%	No
Asian	195	245	80%	12%	2%	No
American Indian, Alaska Native	29	49	59%	-9%	0%	No
Pacific Islander	30	30	100%	32%	0%	No
Hispanic	1900	2,705	70%	2%	27%	No

Table 14A - Disproportionally Greater Need 30 - 50% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Table 1.7. Disproportionate Need Based on Race and Income – 50-80% AMI

Legend

10 percentage points or more above Jurisdiction as whole
8 or 9 percentage points above Jurisdiction as whole

50%-80% of Area Median Income: Disproportionate Greater Need

Housing Problems	Has one or more of four housing problems	Total Households	Percent of Total Households <i>Has one or more of four housing problems</i>	Percentage Points above or below Jurisdiction as a whole	Percent of Total Jurisdiction Households	Disproportionate Greater Need? <i>10 percentage points or more <u>above</u> Jurisdiction as a whole, <u>AND</u> representing 10 percent or more of total Jurisdiction households</i>
Jurisdiction as a whole	5,450	14,010	39%	Reference	Reference	N/A
White	3,175	7,865	40%	1%	56%	No
Black / African American	294	828	36%	-3%	6%	No
Asian	245	450	54%	16%	3%	No
American Indian, Alaska Native	14	38	37%	-2%	0%	No
Pacific Islander	15	15	100%	61%	0%	No
Hispanic	1675	4,705	36%	-3%	34%	No

Table 15A - Disproportionally Greater Need 50 - 80% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Table 1.8. Disproportionate Need Based on Race and Income – 80-100% AMI

Legend

10 percentage points or more above Jurisdiction as whole
8 or 9 percentage points above Jurisdiction as whole

80%-100% of Area Median Income: Disproportionate Greater Need

Housing Problems	Has one or more of four housing problems	Total Households	Percent of Total Households <i>Has one or more of four housing problems</i>	Percentage Points above or below Jurisdiction as a whole	Percent of Total Jurisdiction Households	Disproportionate Greater Need? <i>10 percentage points or more <u>above</u> Jurisdiction as a whole, <u>AND</u> representing 10 percent or more of total Jurisdiction households</i>
Jurisdiction as a whole	1,295	7,650	17%	Reference	Reference	N/A
White	835	4,620	18%	1%	60%	No
Black / African American	125	475	26%	9%	6%	No
Asian	23	318	7%	-10%	4%	No
American Indian, Alaska Native	4	32	13%	-4%	0%	No
Pacific Islander	0	0	--	--	0%	N/A
Hispanic	310	2,130	15%	-2%	28%	No

Table 16A - Disproportionally Greater Need 80 - 100% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

2.4 CDBG Eligible Census Tracts and Block Groups

The CDBG Program requires that at least 70% of a grantee's federal funds go for activities that directly low-income persons. Additionally, the program allows that activities may be eligible if the area that is being benefited by the federal funds is primarily, or more than 50%, occupied by low-income residents (annual income is less than 80% of the area's Median Income).

The FY 2020 analysis of the 5-year Low and Moderate Income Summary data by HUD indicates that 44.79% of the City's overall population is low-moderate income (annual income below 80% of the area's median income).

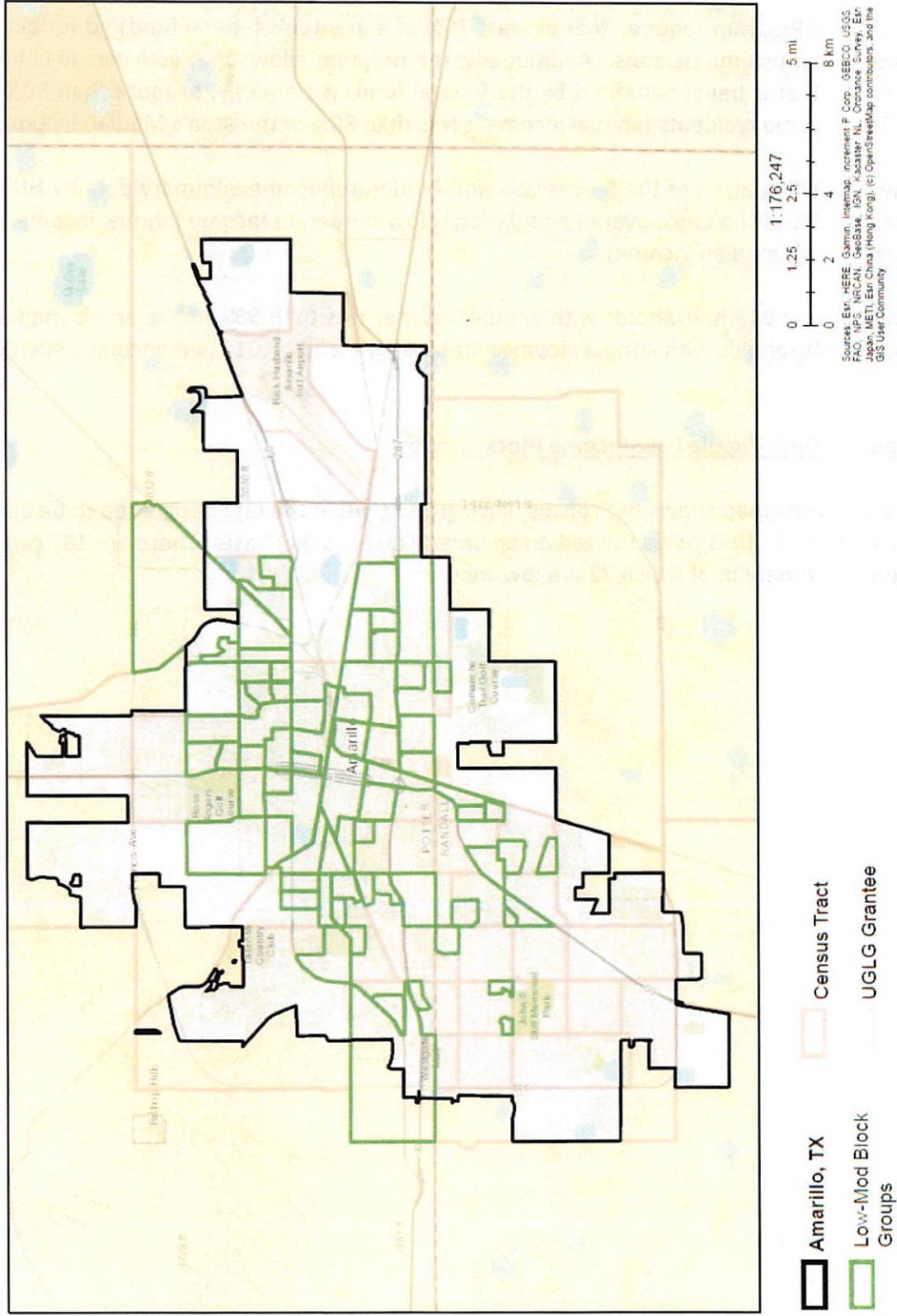
There are 52,915 households with annual incomes less than 50% of the area's median income, 34,260 households with annual incomes 50-80% AMI, and 37,015 with incomes 80-100%.

Map of CDBG Eligible Low-Income Block Groups

The following map shows the census block groups within the City designated to be eligible for the receipt of CDBG funds utilized on an area-wide eligibility basis. There are 167 census block groups in Amarillo, of which 72 are low-mod.

Low-Mod Block Groups – Map
Data Source: HUD CPD Maps, 2011-2015 ACS and 2011-2015 CHAS

Amarillo, TX - Low-Mod Block Groups



2.5 Employment Data and Trends

The 2018 census update indicates Amarillo’s 71,711 member workforce is diverse in terms of the type of profession or occupation. More than 44% of the workforce is employed in the top three professions or services: Retail Trade, Education and Health Care Services, and Manufacturing. The next 4 ranked professions total 33% and Professional, Scientific, and Management Services. The remaining 6 professions total 17%, with each profession being lower than 5%. According to 2018 ACS data, the majority of employment in the area (58%) is of a “white-collar” nature, and exceeds the Texas rate of 35.48%.

Table 1.9. Professions/Occupations

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	2,321	870	3	1	-2
Arts, Entertainment, Accommodations	10,351	12,201	14	16	2
Construction	4,775	4,778	6	6	0
Education and Health Care Services	11,704	14,039	15	18	3
Finance, Insurance, and Real Estate	5,032	6,330	7	8	2
Information	1,086	1,174	1	2	0
Manufacturing	10,935	4,116	14	5	-9
Other Services	2,821	3,360	4	4	1
Professional, Scientific, Management Services	4,250	5,352	6	7	1
Public Administration	0	0	0	0	0
Retail Trade	11,739	14,963	15	19	4
Transportation and Warehousing	2,776	2,231	4	3	-1
Wholesale Trade	3,921	3,721	5	5	0
Total	71,711	73,135	--	--	--

Business Activity

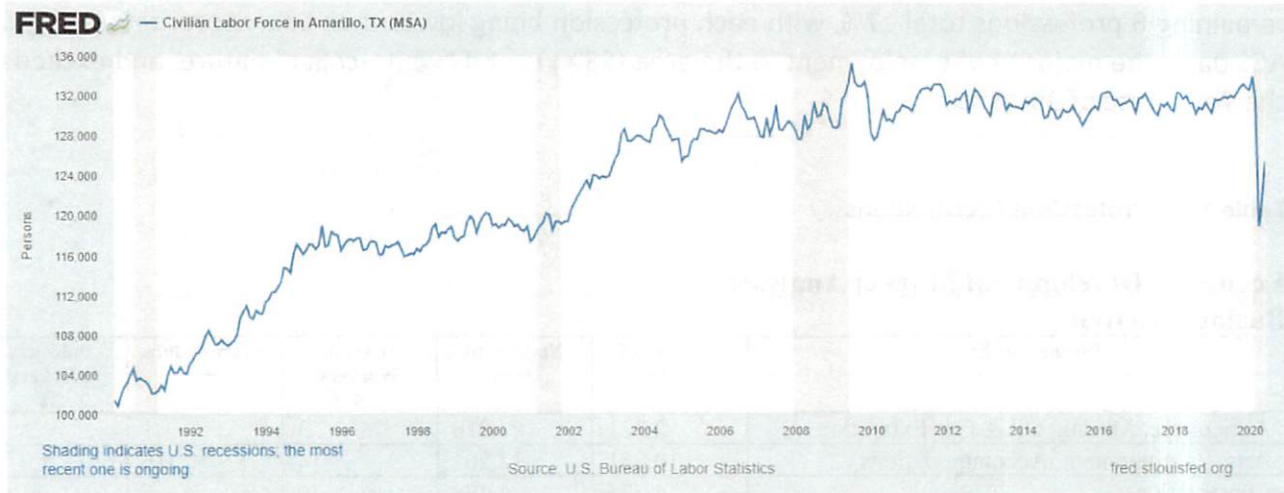
Data Source: 2011-2015 ACS (Workers), 2015 Longitudinal Employer-Household Dynamics (Jobs)

The updated 2019 Census data indicates that 32.6% of the City’s population over age 16 was not in the work force, while 67.4% of the City’s total population between the ages of 16-64 (working age) was in the work force. *The total labor force according to the U.S. Bureau of Labor Statistics as of January 2020 was 125,600, with 118,000 being employed.*

A study completed in 2017 (Community Assessment of Potter and Randall County) looked at Amarillo’s workforce. Their results showed that Amarillo’s workforce is diminishing – and at an alarming rate. While the City’s population had grown 4.5% in the five years previous, the workforce had only grown 0.8 percent in comparison, which was well below the national average. The share of the labor force with some college or a college degree had grown more quickly than than national population, however, there was also a declining number of workers with only a high school degree or less. The report concluded that the declining workforce could present future

problems for the City due to hiring challenges. Also, associated with this is the data that indicates that the City’s non-white population is increasing, which has an even lower number of bachelor’s degrees and a higher share being in poverty.

Exhibit 1.10. City’s Labor Force 1992-2020



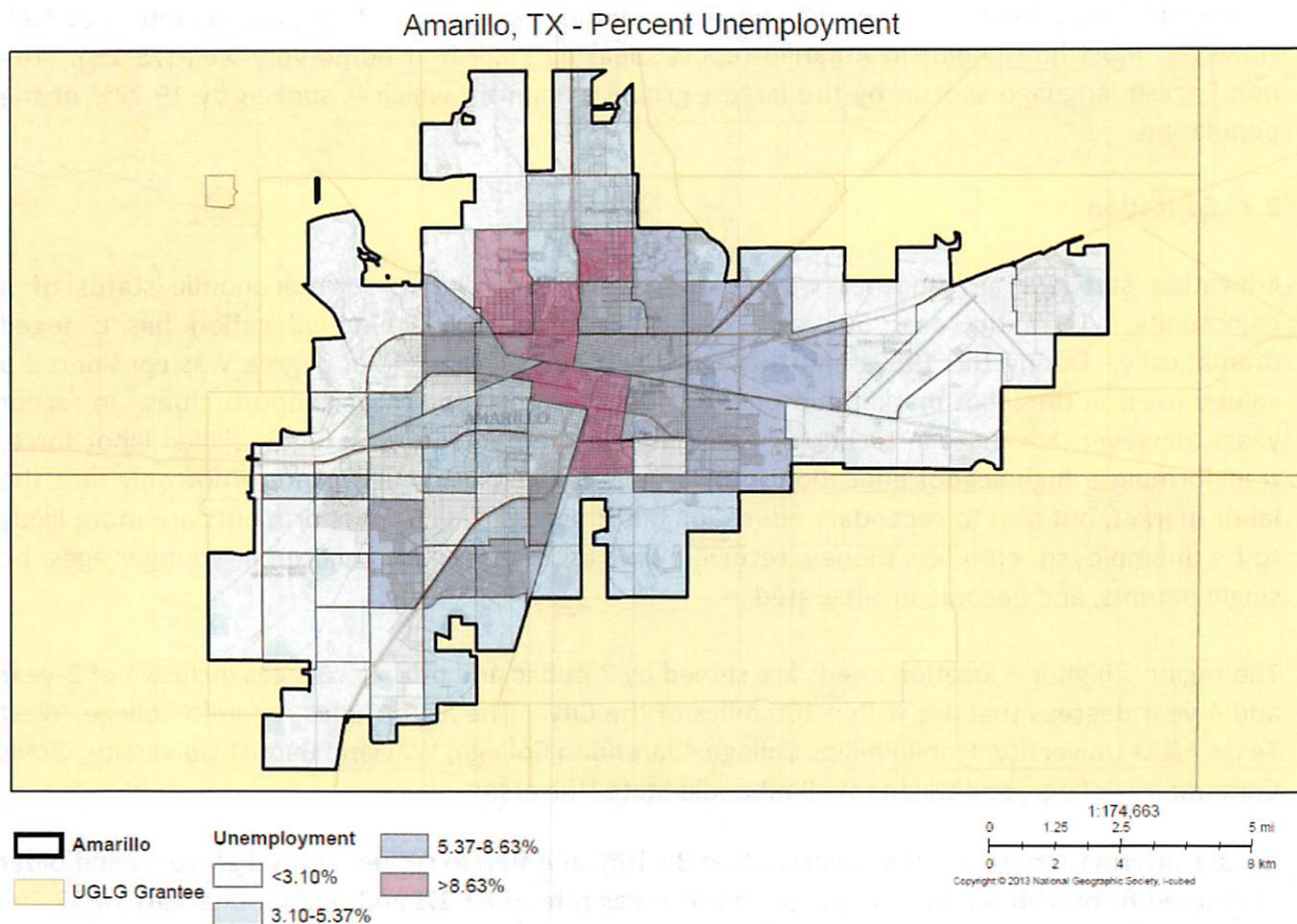
U.S. Bureau of Labor Statistics data indicates a steadily decreasing unemployment rate from 2010 through 2020 ranging from a low of 2.9% in March 2020 to the high of 5.7% in 2010. Official unemployment rates exclude jobless people not actively seeking work, but who indicate they want or are available for work (marginally attached workers), and part-time workers who want full-time jobs. Due to the COVID-19 Pandemic, unemployment rates shot up to 11.3% by May, 2020, and are expected to continue to rise as the economic impact of COVID continues.

Table 1.11. Unemployment Trends 2010-2020 (in percent) – Annual Averages

Area	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Amarillo	5.7	5.4	4.8	4.6	3.7	3.1	3.1	3	2.7	2.6	2.9
Texas	8.1	7.8	6.7	6.3	5.1	4.4	4.6	4.3	3.8	3.5	3.5
U.S.	9.6	8.9	8.1	7.4	6.2	5.3	4.9	4.3	3.9	3.7	3.8

Map 1.12. Percent Unemployed – Map

Data Source: HUD CPD Maps, 2011-2015 ACS and 2011-2015 CHAS



2.5.1 Underemployment

There is not data available to demonstrate or record the level of “underemployment”, a situation where household earnings are not sufficient to provide adequate basic necessities. Additionally, while offering employment opportunities when they might not otherwise be available, many employers do not provide affordable health care or other leave benefits. Non-profit organizations consistently report rising numbers of “working poor” who do not meet the eligibility criteria for some federally funded programs, but are still in need of assistance. The recent welfare reform legislation has led to many families becoming disqualified or ineligible for continued assistance, but still lacking the necessary skills and training needed for self-sufficiency. Other identified major barriers to the attainment and retainment of employment is the lack of affordable and accessible childcare and transportation.

2.6 English Proficiency

Amarillo is a diverse community – the top five ancestries include 11.7% German, 8.9% Irish, 8% English, American, 6.4%, 2% French, 1.6% Italian, and 1.5% Scottish – with the remaining percentages spread out across 7 different ancestries. More than 24.9% of Amarillo households report speaking a language other than English at home (Texas rate is 35.5% and US rate is 21.5%). However, most households in Amarillo report speaking English at home very well (75.1%). The non-English language spoken by the largest group is Spanish, which is spoken by 19.22% of the population.

2.7 Education

Education statistics are another way to determine the relative socio-economic status of a community. Over the past 50 years, the value of a high school education has changed dramatically. During the 1950s and through the 1970s, a high school degree was considered a valued asset in the labor market and opened doors to promising career opportunities. In recent years, however, advances in technology have fueled the demand for a highly skilled labor force, transforming a high school education into a minimum requirement for entry not only into the labor market, but also to secondary education and training. High school dropouts are more likely to be unemployed, earn less money, receive public assistance, have children at younger ages, be single parents, and become incarcerated.

The region's higher education needs are served by 7 public and private colleges inclusive of 2-year and 4-year degrees that are within 100 miles of the City. The list includes Amarillo College, West Texas A&M University, Frank Phillips College, Clarendon College, Wayland Baptist University, Clovis Community College, and Oklahoma Panhandle State University.

Census information from 2018 indicates that 84.10% of Amarillo residents aged 25 years and older graduated from high school, compared to the Texas rate of 83.2% and the national rate of 87.7%. More than 23.3% of this same age group graduated from college, compared to the state rate of 29.3% and the national rate of 31.5%. Almost 13.9% of Amarillo residents attended high school, but did not graduate.

The following table includes the 2018 American Community Survey related to education and compared to Wichita County and the State of Texas.

2.8 Public Transportation

As common in most cities, railways and street cars were the first public transportation systems available to City residents. The City's Transit Department (Amarillo City Transit or ACT) was established in 1966, and offers thirteen bus transit routes throughout the City. Free daytime transportation is provided to and from three Amarillo College campuses, and anyplace else that the City Transit buses go – for students and college workforces. Paratransit services are reserved for persons unable to navigate an accessible fixed route bus system. The City is planning to update services soon by renovating the downtown bus facility.



In a 2015 needs assessment of the Panhandle region by Panhandle Community Services, transportation ranked as one of the top five major needs in the area. Panhandle Transit provides transportation to non-urban areas for access to employment, education, shopping, recreation, health care, and social services. The curb-to-curb, demand/response services allows pick-up and/or drop-off of passengers based on their needs.

The 2018 ACS indicated that the primary means of transport to work was private car (83%) and the mean travel time to work was 17.8 minutes. Residents also reported using carpool (12%), public transit (1%), and walking to work (1%). Two percent reported working at home.

Section 3: Amarillo Housing Profile

The tenure (homeowner/renter rates), vacancy rates, value, age, and condition of housing are all factors that may influence the availability, accessibility, and cost of housing that may be utilized by low-income households. There are 75,563 occupied residential housing units in Amarillo. New construction of single-family homes has picked up in the last 10 years (5.3% of the City’s housing stock was built between 2010 and 2015), but most, if not all, newly constructed homes would not be affordable for low-income households. The median home value is \$127,200, which is considered Low for Texas and Very Low nationwide.

Table 1.15. Owner-Occupied Home Values of Amarillo and Texas

Value Range	Percentage of Total Homes	Texas
\$0 - \$50,000	10%	9.8%
\$50,001 - \$99,999	27.1%	18.3%
\$100,000 - \$149,999	22.9%	17.4%
\$150,000 - \$199,999	18.3%	16%
\$200,000 - \$299,999	13.3%	18.1%
\$300,000+	8.2%	20.2%
Median Value	\$127,200	\$161,700

Data Source: 2014-2018 ACS

By far, the most common housing problem in Amarillo is cost burden.

3.1 Housing Tenure, Vacancy Rate, and Value

3.1.1 Owner Housing

Housing tenure is generally a leading indicator in communities, with the level of owner/renter occupied housing being indicative of the level of financial and social commitment that residents have in their neighborhood and in the community. Neighborhoods that are predominantly owner-occupied typically appear more stable and less inclined to show signs of deterioration. Generally, these neighborhoods reflect signs of private reinvestment and the value of the housing is maintained or increased over time.

Amarillo’s rate of homeownership (61.2%) is comparable to the Texas state rate of 62% and the national rate of 64%. Over the last few years, the rate of homeownership nationwide has gradually decreased – for a variety of reasons including high property taxes, rising home prices, rising raw land prices, more mobile population, and first-time homebuyers are buying homes later in life.

As historically the case, the lowest income households have the least housing stock from which to choose, and not enough to meet the needs of the community. No homes are priced at a level affordable to individuals earning below 30 percent of the Area Median Income (AMI), rental properties are their only option.

3.1.2 Renter Housing

Amarillo’s rate of homeownership (61.2%), combined with the low production of affordable new units has led to several years of increased difficulties for Section 8 tenants (and other low income tenants) to obtain housing that is within the area’s market rental rate and still meets Housing Quality Standards.

Households with incomes less than 50% of the area’s median income can qualify for rental assistance through the Amarillo Housing Choice Voucher Program. The Section 8 wait list had to be closed because the waiting time for assistance was approximately 4 years. It is not anticipated the waiting list will be reopened until the waiting period is at or below 18 months. Since the wait list is comprised of families with extremely low incomes, the private housing market holds little hope of their finding suitable housing without assistance. This points to the need for additional housing options for potential voucher holders. The City has no direct influence on the federal funding situation and is supportive of any efforts that could be made to relieve the situation.

The rental vacancy rate is the fraction of homes for rent that are not occupied. In 2017, the rental vacancy rate was 8.15% according to ACS data, compared to 6.18% for the US and 8.49% for the State of Texas. From 2006-2017, the vacancy rate for the City peaked at 12.73% in 2009.

Updated census data indicates a median gross rent of \$839. This is quite lower than the Texas median rent of \$987, and the US rate of \$1,012. Average gross rent for the City continues to rise each year since 2006.

Table 1.17. Median and Average Gross Rent History for Amarillo (2006-2017)

Year	US Median	Texas Median	Amarillo Median	Amarillo Average
2017	\$1,012	\$987	\$826	\$823
2016	\$996	\$971	\$822	\$849
2015	\$987	\$959	\$818	\$865
2014	\$956	\$917	\$820	\$816
2013	\$924	\$875	\$763	\$790
2012	\$912	\$857	\$756	\$761
2011	\$912	\$852	\$729	\$767
2010	\$927	\$868	\$739	\$708
2009	\$931	\$871	\$726	\$716
2008	\$947	\$882	\$773	\$793
2007	\$899	\$836	\$702	\$708
2006	\$909	\$847	\$730	\$709

The table above demonstrates the fairly stable rise of median and average rents in Amarillo since 2006. The 2017 ACS indicates that the median monthly gross rental as a fraction of median household income was 18.38%. This is comparable to Texas (20%) and the US (20.13%).

Table 1.18. Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	52,795	11,435	9,585	955
White	36,485	7,150	5,015	580
Black / African American	2,215	985	1,095	90
Asian	1,565	335	245	15
American Indian, Alaska Native	245	39	65	0
Pacific Islander	40	40	20	0
Hispanic	11,675	2,810	2,965	255

A review of the disproportionate need indicates the following:

- 1) 71% of 0-30% households report a cost burden. There is no disproportionate need based on race/ethnicity.
- 2) 15% of 30-50% households report a cost burden. The Pacific Islander population reports 40% of the population has a cost burden.
- 3) 13% of 50-80% households report a cost burden. The Black/African American population reports 25% of the population has a cost burden.

Legend

10 percentage points or more above Jurisdiction as whole
8 or 9 percentage points above Jurisdiction as whole

Housing Cost Burden <=30%: Disproportionate Greater Need

Housing Cost Burden	<=30%	Total Households	Percent of Total Households Has Housing Cost Burden <=30%	Percentage Points above or below Jurisdiction as a whole	Percent of Total Jurisdiction Households	Disproportionate Greater Need? 10 percentage points or more <u>above</u> Jurisdiction as a whole, <u>AND</u> representing 10 percent or more of total Jurisdiction households
Jurisdiction as a whole	52,795	74,770	71%	Reference	Reference	N/A
White	36,485	49,230	74%	4%	66%	No
Black / African American	2,215	4,385	51%	-20%	6%	No
Asian	1,565	2,160	72%	2%	3%	No
American Indian, Alaska Native	245	349	70%	0%	0%	No
Pacific Islander	40	100	40%	-31%	0%	N/A
Hispanic	11,675	17,705	66%	-5%	24%	No

Table 21A – Greater Need: Housing Cost Burdens AMI

Data Source: 2011-2015 CHAS

Legend

10 percentage points or more above Jurisdiction as whole
8 or 9 percentage points above Jurisdiction as whole

Housing Cost Burden 30-50%: Disproportionate Greater Need

Housing Cost Burden	30-50%	Total Households	Percent of Total Households <i>Has Housing Cost Burden 30-50%</i>	Percentage Points above or below Jurisdiction as a whole	Percent of Total Jurisdiction Households	Disproportionate Greater Need? <i>10 percentage points or more <u>above</u> Jurisdiction as a whole, <u>AND</u> representing 10 percent or more of total Jurisdiction households</i>
Jurisdiction as a whole	11,435	74,770	15%	Reference	Reference	N/A
White	7,150	49,230	15%	-1%	66%	No
Black / African American	985	4,385	22%	7%	6%	No
Asian	335	2,160	16%	0%	3%	No
American Indian, Alaska Native	39	349	11%	-4%	0%	No
Pacific Islander	40	100	40%	25%	0%	N/A
Hispanic	2,810	17,705	16%	1%	24%	No

Table 21B – Greater Need: Housing Cost Burdens AMI

Data Source: 2011-2015 CHAS

Legend

10 percentage points or more above Jurisdiction as whole
8 or 9 percentage points above Jurisdiction as whole

Housing Cost Burden >50%: Disproportionate Greater Need

Housing Cost Burden	>50%	Total Households	Percent of Total Households <i>Has Housing Cost Burden >50%</i>	Percentage Points above or below Jurisdiction as a whole	Percent of Total Jurisdiction Households	Disproportionate Greater Need? <i>10 percentage points or more <u>above</u> Jurisdiction as a whole, <u>AND</u> representing 10 percent or more of total Jurisdiction households</i>
Jurisdiction as a whole	9,585	74,770	13%	Reference	Reference	N/A
White	5,015	49,230	10%	-3%	66%	No
Black / African American	1,095	4,385	25%	12%	6%	No
Asian	245	2,160	11%	-1%	3%	No
American Indian, Alaska Native	65	349	19%	6%	0%	No
Pacific Islander	20	100	20%	7%	0%	N/A
Hispanic	2,965	17,705	17%	4%	24%	No

Table 21C – Greater Need: Housing Cost Burdens AMI

Data Source: 2011-2015 CHAS

3.2 Age of Housing

There are 79,861 residential housing units, and the median year built is 1970. The 2018 ACS indicated that 53,666 housing units in the City were built prior to 1980, representing 67.3% of the City's housing stock. Housing units built prior to 1980 typically have a higher incidence of substandard features due to original and inadequate design and materials that were acceptable under the applicable building codes at the time. Units that are deteriorating and have defective paint surfaces pose an even higher risk because of the possibility of contact with dust containing lead. These units could now be expected to be occupied by elderly, or low-income homeowners or renters.

Table 1.19. Amarillo Housing Inventory based on Year Built (2018 5-Year ACS data)

Total:	84,324	Percentage
Built 2014 or later	1,323	1.6%
Built between 2010 and 2013	3,099	3.7%
Built between 2000 and 2009	8,798	10.4%
Built between 1990 and 1999	6,599	7.8%
Built between 1980 and 1989	9,043	10.7%
Built between 1970 and 1979	13,308	15.8%
Built between 1960 and 1969	,13,823	16.4%
Built between 1950 and 1959	15,947	18.9%
Built between 1940 and 1949	6,964	8.3%
Built 1939 or earlier	5,420	6.4%

Section 4: Fair Housing Complaints

4.1 Fair Housing Laws

The Federal Fair Housing Act (the Act) was enacted in 1968, and amended in 1974 and 1988 to add protected classes, provide additional remedies, and strengthen enforcement. The Act, as amended, makes it unlawful for a person to discriminate on the basis of race, color, sex, religion, national origin, handicap, or familial status. Generally, the Act prohibits discrimination based on one of the previously mentioned protected classes in all residential housing, residential sales, advertising, and residential lending and insurance. Prohibited activities under the Act, as well as examples, are listed below.

It is illegal to do the following based on a person's membership in a protected class:

- Misrepresent that a house or apartment is unavailable by:
 - ✓ Providing false or misleading information about a housing opportunity,
 - ✓ Discouraging a protected class member from applying for a rental unit or making an offer of sale, or
 - ✓ Discouraging or refusing to allow a protected class member to inspect available units;
- Refuse to rent or sell or to negotiate for the rental or sale of a house or apartment or otherwise make unavailable by:
 - ✓ Failing to effectively communicate or process an offer for the sale or rental of a home,
 - ✓ Utilizing all non-minority persons to represent a tenant association in reviewing applications from protected class members, or
 - ✓ Advising prospective renters or buyers that they would not meld with the existing residents;
- Discriminate in the terms, conditions, or facilities for the rental or sale of housing by:
 - ✓ Using different provisions in leases or contracts for sale,
 - ✓ Imposing slower or inferior quality maintenance and repair services,
 - ✓ Requiring a security deposit (or higher security deposit) of protected class members, but not for non-class members,
 - Assigning persons to a specific floor or section of a building, development, or neighborhood, or
 - Evicting minorities, but not whites, for late payments or poor credit;
- Make, print, publish, or post (direct or implied) statements or advertisements that indicate that housing is not available to members of a protected class;
- Persuade or attempt to persuade people, for profit, to rent or sell their housing due to minority groups moving into the neighborhood by:
 - ✓ Real estate agents mailing notices to homeowners in changing area with a listing of the homes recently sold along with a picture of a Black real estate agent as the successful seller, or

- ✓ Mailed or telephonic notices that the "neighborhood is changing" and now is a good time to sell, or noting the effect of the changing demographics on property values;
- Deny or make different loan terms for residential loans due to membership in a protected class by:
 - ✓ Using different procedures or criteria to evaluate credit worthiness,
 - ✓ Purchasing or pooling loans so that loans in minority areas are excluded,
 - ✓ Implementing a policy that has the effect of excluding a minority area, or
 - ✓ Applying different procedures (negative impact) for foreclosures on protected class members;
- Deny persons the use of real estate services;
- Intimidate, coerce or interfere; or
- Retaliation against a person for filing a fair housing complaint.

The Fair Housing Act requires housing providers to make reasonable accommodations in rules, policies, practices, and paperwork for persons with disabilities. They must allow reasonable modifications in the property so people with disabilities can live successfully. Due to the volume of questions and complaints surrounding this aspect of the federal act, in March 2008, the Department of Justice (DOJ) and the Department of Housing and Urban Development (HUD) released a joint statement to technically define the rights and obligation of persons with disabilities and housing providers.

In addition to prohibiting certain discriminatory acts, the Act places no limit on the amount of recovery and imposes substantial fines. The fine for the first offense can be up to \$11,000; the second offense within a five year period, up to \$27,500; and for a third violation within seven years up to \$55,000.

The prohibition in the Fair Housing Act against advertising that indicates any "preference, limitation or discrimination" has been interpreted to apply not just to the wording in an advertisement but to the images and human models shown. Advertising campaigns may not limit images to include only or mostly models of a particular race, gender, or family type.

As a test to determine if advertising relative to housing and real estate in the local housing market have impediments to fair housing, a review of local advertisements in real estate publications from March and April, 2015 was conducted. These types of advertisements cover an area larger than just Amarillo, and the time-period is insufficient to conclusively establish a pattern of discrimination. The data does; however, provide an accurate snapshot of the advertising available, and a general overview of the state of compliance with fair housing law. The advertising, especially those with images of prospective or current residents was reviewed, with a sensitivity toward:

- Advertising with all or predominately models of a single race, gender, or ethnic group;
- Families or children in ad campaigns depicting images of prospective residents;
- Particular racial groups in service roles (maid, doorman, servant, etc.);
- Particular racial groups in the background or obscured locations;

- Any symbol or photo with strong racial, religious, or ethnic associations;
- Advertising campaigns depicting predominately one racial group;
- Campaigns run over a period of time, including a number of different ads, none or few of which include models of other races;
- Advertisement failing to contain Equal Housing Opportunity (EHO) statements or logos, or contains the statement or logo, but it is not readily visible; and
- Advertising campaigns involving group shots or drawings depicting many people, all or almost all of whom are from one racial group.

Publications advertising the sale or rental of housing directed toward persons in the greater Amarillo area were reviewed including Apartment Finder, The Real Estate Book, and various local real estate sales publications. There were no major concerns revealed. Some publications made blanket statements at the front of the publication stating that the magazines as well as their advertisers are subject to the Federal Fair Housing Act. Most of the advertisers advertise with the equal housing opportunity logo or slogan. Including the logo helps educate the home seeking public that the property is available to all persons. A failure to display the symbol or slogan may become evidence of discrimination if a complaint is filed. Additionally, most of the images included in the selected materials either represented racial, ethnic or gender diversity among the models selected.

4.2 Analysis of Fair Housing Complaints

- There have not been any fair housing complaints or compliance reviews where the Secretary has issued a charge of or made a finding of discrimination.
- Fair housing discrimination suit filed by the Department of Justice or private plaintiffs: The City is not aware of any discrimination suits being filed either with the City or HUD. Complaints received by HUD over the last several years have been reviewed and dismissed with no legal actions being taken.

Section 5: Review of Public and Private Sector Policies and Practices/Activities

5.1 Introduction

In the development of this plan, governmental entities were contacted to indicate public policies that might add to the cost or deter the development of affordable housing activities within their jurisdictions. The overwhelming response was support of the development of affordable housing programs and any other services that would assist the community and local residents, especially the elderly and low income.

The purpose of development regulations is to protect the health, safety, and welfare of the community. In determining strategies for reducing housing affordability and accessibility conflicts, an effective balance must be established between protecting other societal and environmental goals, while achieving housing affordability. This can result in a real challenge for municipalities.

The following issues listed below were reviewed. *No significant barriers to affordable housing were found to exist in the available public policies, however, information provided below indicates a need for a review of development processes and costs. Instead, the single most influential factor in the price of new housing development appears to be market-driven.*

There are no public policies that limit or affect the return on residential investments. However, although there does not appear to be any overt public policy barriers to affordable housing, regular reviews of taxes, fees, building codes, and zoning regulations continue to be necessary to ensure that unanticipated barriers do not develop. Additionally, a regular Analysis of Impediments is necessary to gauge what impact any future changes might have on accessibility to housing.

5.2 Public Sector

5.2.1 Zoning and Site Selection: There are no restrictive policies regarding zoning, site use, minimum lot size, minimum square footage, setback requirements, or other related zoning issues in the areas of the city most likely to receive federal funding assistance. The City has made adjustments to allow for smaller-sized lots in order to facilitate new infill housing. There are subdivisions within the City that do contain restrictions (minimum square footage, minimum lot sizes, etc.) that would be cost prohibitive to the development of affordable housing, however these requirements are not city-wide.

5.2.2 Fair Housing Ordinance and Informational Programs: Entities within the City typically respond to any complaint by referring the individual to the U.S. Department of Housing and Urban Development – Fair Housing. The City has adopted goals within this Consolidated Plan to further Fair Housing information and will ensure that community leaders receive information and are educated regarding referral of fair housing issues to the proper site for assistance.

The City of Amarillo is dedicated to ensuring the provision of services and programs, which prohibit discrimination in the sale or rental of housing, and discrimination in the provision of brokerage services. The City is committed to ensuring the implementation of appropriate procedures regarding complaints, investigation, cumulative legal effect,

unlawful intimidation, education and public information and penalty. The City is not under any court order or decree regarding Fair Housing. The City does not have a rental control ordinance.

Properties throughout the City will be considered eligible for the City's programs. It is the intention of the City to provide housing opportunities outside of low-income neighborhoods in an effort to provide maximum ownership opportunities and to encourage mixed-income and integrated neighborhoods.

Information regarding programs will be made available to the public through the use of public hearings and ads in the classified section of local newspapers and on the City of Amarillo's website at www.ci.Amarillo.tx.us. Press releases will be given to the local papers; one of which is free to the public and will reach individuals who cannot afford to subscribe to the local paper. Additionally, program information will be made available to local newspapers that are targeted for minority and non-English speaking populations. Information and applications will be provided to local agencies that deal with low-moderate income people including the Housing Choice Voucher Program and other HUD rental assistance programs. Local churches and community organizations in low-income areas will be contacted regarding distributing information and city staff will be available to speak to organizations or groups of interested individuals.

- 5.2.3** PHA and Other Assisted/Insured Housing Provider Tenant Selection Procedures; Housing Choices for Voucher Holders: The City of Amarillo administers a total of 488 Project Based Section 8 to residents of Amarillo, including 2,820 Housing Choice Vouchers. Additionally, there are 119 Section 202 elderly and 3 Section 811 developmentally disabled persons assisted units. These assisted units consist of occupants that are 41% White (non-Hispanic), 25% White (Hispanic), 30% African American/Black, 1% Native American, and 1% percent Pacific Islander. The average income of voucher holders is below \$12,003.

A review of their selection policies and criteria do not indicate any policies that would pose barriers to affordable housing. The City actively supports, requires, and encourages practices, policies, and procedures that prohibit disability discrimination. All developments provide accessible units within the complexes and the Authority is willing to make reasonable accommodations when requested.

- 5.2.4** Property Tax Policies: The Wichita Appraisal District is governed by Texas Appraisal Laws. The typical policy is to appraise taxable properties at least once every 3 years. However, it can be reappraised as often as every year if the market is active in that area. All appraisals can be appealed and must follow the Fair Housing Law. The Appraisal District published a details regarding the process and procedures to be followed in its data collection, analysis, and reappraisal efforts.

In the 2019 review of 18 Texas cities with populations between 100,001 and 200,000 conducted by the Texas Municipal League (TML), there was no information provided regarding Amarillo's Gross Tax Rate.

The City offers the same or similar exemptions found in most cities: Homestead, Disabled Person, Disaster, and Over 65/Disabled.

- 5.2.5** Building Code Requirements, Impact and Other Fees, and Land Use Controls:

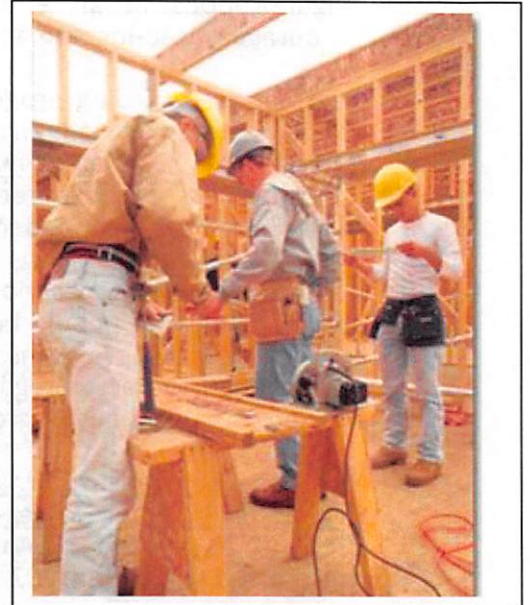
Building Codes: Any federally funded housing development must comply with state and federal guidelines regarding construction requirements in addition to the locally adopted building codes. Currently, all construction within the City must comply with the City's

currently adopted editions and supplements of the International Code Council's International Residential Codes and the locally adopted amendments to these codes (available at www.wichitafallstx.gov), including:

- International Building Code
- International Residential Code
- International Existing Building code
- International Fuel Gas Code
- International Mechanical Code
- International Plumbing Code
- International Fire Code
- National Electrical Code
- International Energy Code

These codes are commonly used by municipalities of similar size to Amarillo. A review of the local amendments does not reveal any obvious issues that would discourage the development of affordable housing.

The City also provides for construction inspections when needed for after-hours, weekends, or emergency situations in order to prevent delays or disruptions to construction projects.



Sales Tax: Amarillo's sales tax is 8.25%. This rate includes:

- 6.25% for the State of Texas
- 2% for the City of Amarillo general fund
- 0% for Wichita County

Historic Preservation: Cities often identify special districts to maintain and preserve historically and architecturally significant structures. Regulations governing the preservation of historic buildings within a district could possibly have a negative effect with regards to affordable housing. This may come in the form of delays due to the State's review process and to the added material and construction costs involved in restoring a structure to its original appearance. Amarillo does have some scattered historic preservation sites or structures located throughout the City. However, it would not be expected that the presence of these areas would affect significantly the development of affordable housing.

The City of Amarillo is recognized by the Texas Historical Commission as a Certified Local Government (CLG) based on its historic preservation program. A local landmark or historic district designation is used as the City's official acknowledgment of properties significant in Amarillo's history, culture, architecture, and archeology. There is a designated Downtown Historic District.

Fees: The City may consider, on a project-by-project basis, the waiver of certain fees associated with the development of affordable housing projects or activities.

Water Usage Fees: There was no available data to evaluate and compare Amarillo's Water Usage Fees to cities of similar size.

Wastewater Use Fees: There was no available data to evaluate and compare Amarillo's Wastewater Usage Fees to cities of similar size.

5.2.6 Environmental: The annual environmental review process conducted by the City for the use of federal funds does not indicate any severe or unusual environmental issues that regularly affect the ability to develop affordable housing. However, recent increases imposed by federal regulatory agencies in the level of environmental review required for larger housing developments may increase the pre-development costs needed to determine project feasibility for the for-profit developers.

5.2.7 City Practices and Activities: The City has actively taken steps to address and encourage participation of low income and other special need residents in the CDBG funded activities and other City functions, including the following:

- As part of the annual public hearing process, the City makes available information regarding fair housing to the public and displays the Fair Housing logo.
- The Fair Housing statement is publicly displayed at all CDBG public hearings and in the City's Community Development Department where residents or organizations who may be applying for CDBG services may view it.
- The City will distribute information regarding homeownership and subsidized rental programs funded by other organizations at public hearings in order to assist lower-income households with locating affordable housing.
- The City will distribute information regarding lead based paint hazards at public hearings in order to assist lower-income households with locating suitable housing that is affordable and decent, safe, and sanitary.
- The City conducted on-site visits of the CDBG funded non-profit organizations to ensure their facilities and intake functions are accessible.
- The City will complete annual reviews of its AI during the Annual Plan process.
- City staff are available to offer Fair Housing counseling and direct residents to the appropriate resources upon request.
- The City offers the use of interpretative (or bilingual) services as needed or requested for applicant intake services and for public hearings.
- The City will make documents available in English and Spanish as needed or requested.
- The City's elected officials and staff have worked diligently successfully for several years to bring public transportation to Amarillo and thereby increase the employment opportunities for lower income households throughout the City.
- The City's Administrative Policies and Operating Procedures Manual includes an Equal Employment Opportunity Statement stating that if pre-employment testing reveals that accommodations will be necessary for an individual to perform essential job functions, the City will determine if reasonable job accommodations can be made.

5.3 Private Sector

5.3.1 Lending Policies and Practices: The Community Reinvestment Act, enacted in 1977, is intended to encourage depository institutions to help meet the credit needs of the communities in which they operate, including low and moderate income neighborhoods. The CRA requires that an evaluation be periodically completed on each institution. Rating levels include *Outstanding, Satisfactory, Needs to Improve, and Substantial Noncompliance*. There are separate systems for evaluating banks based on their amount of assets (small banks, large banks, etc.). Banks are evaluated based on five factors:

- Loan-to-deposit ratios
- Percentage of loans made within a bank's lending territory (called assessment areas)
- Geographic distribution of a bank's loans
- Distribution of a bank's loans among borrowers with different income levels and businesses of different sizes
- Records of response to written complaints about its CRA performance

A quick review of local lenders as of 2018, indicated Satisfactory CRA ratings for local lenders, with one lender, Amarillo National Bank, earning an Outstanding rating in two areas – Lending and Services, and a High Satisfactory rating in Investments. No evidence of discriminatory or other illegal credit practices inconsistent with helping meet community credit needs were identified.

The CRA has prompted some lenders to implement affordable housing programs, with the result that these programs have increased the percentage nationwide of low-income and minority households qualifying for loans. Some national financial institutions are actively developing programs to provide assistance to first-time homebuyers.

The rate of homeownership in Amarillo has been slowly decreasing since 2010. The most recent data (2018 ACS) shows 61.2% of Amarillo residents own the home in which they reside.

5.3.2 Private Properties Available for Housing Choice Voucher Program: Households seeking rental assistance through the Housing Choice Voucher program report an on-going difficulty finding units to rent within the approved Fair Market Rent limit. This is a problem reported nationally by PHAs and is considered by most to be the result of several factors, including Fair Market Rents below local market rate rents, dissatisfied Section 8 landlords, lack of funds for tenant damages, and lack of affordable housing units in these areas.

The current approved Fair Market Rent value appears sufficient for a Voucher holder to find an affordable and suitable rental unit in the Amarillo area, however, the rental market and lack of adequate vacant units may limit the availability of units.

5.3.3 Advertising Media: In accordance with the efforts to limit unlawful publications, statements, or printing of preferential, limiting, or discriminating remarks, a review of advertising media was completed. This included a review of real estate sale and rental advertisements published in the local newspaper, the Amarillo Globe News, and determined that prohibited terminology was not used, and that no preferences concerning the protected classes were evident. No pictures were in either paper, so determination

was made on whether models were of diverse groups. An equal housing opportunity housing notice was contained in the real estate Section: A review of online postings of real estate advertisements for sales and rentals, including Craigslist, was completed and no evidence of discrimination was discovered.

A review of realtor websites active in the Amarillo area revealed that most have Fair Housing information displayed prominently on the webpages and equal housing logos. Most realtors display their photos on their websites, and show models of all races. Some realtors mention that they offer bilingual services.

Section 6: Home Mortgage Disclosure Act (HMDA) Analysis

The Home Mortgage Disclosure Act (HMDA) requires many financial institutions to maintain, report, and publicly disclose loan-level information about mortgages. These data help show whether lenders are serving the housing needs of their communities. They give public officials information that helps them make decisions and policies; and they shed light on lending patterns that could be discriminatory. *A discussion about Lending Policies and Practices can be found in Section 5.3.4.*

A quick review of local lenders as of 2018, indicated Satisfactory CRA ratings for local lenders, with one lender, Amarillo National Bank, earning an Outstanding rating in two areas – Lending and Services, and a High Satisfactory rating in Investments. No evidence of discriminatory or other illegal credit practices inconsistent with helping meet community credit needs were identified.

The CRA has prompted some lenders to implement affordable housing programs, with the result that these programs have increased the percentage nationwide of low-income and minority households qualifying for loans. Some national financial institutions are actively developing programs to provide assistance to first-time homebuyers.

Section 7: Summary of Impediments and Proposed Remedial Actions

Summary of Concerns and Recommendations

Based on a detailed analysis of the information collected, potential impediments and concerns were identified in the following categories – Socioeconomic Factors, Real Estate Factors, Public Policy Factors, and Banking/Finance Factors. Recommendations for remedial actions were identified for each. Some of the recommended remedial actions are conceptual frameworks for addressing existing or possible future impediments or concerns.

1) Socioeconomic Factors

- a. Concern: Based on the age, location, and value of housing in the City, it can be reasonably assumed that much of the housing occupied by lower income residents is of a poor quality and condition.

Remedial Actions: The City should continue and expand its efforts to provide funding for the rehabilitation or reconstruction of housing units occupied by lower income and minority residents. The City should support efforts of local non-profit organizations and private developers to expand their role in the provision of adequate and affordable housing.

2) Real Estate Factors

- a. Concern: The participants of the Amarillo Public Housing Authority report an on-going difficulty finding units to rent that meet HUD's Fair Market Rent. This is a problem reported nationally by Public Housing Agencies (PHAs) and is considered by most to be the result of several factors, including low Fair Market Rents, dissatisfied Section 8 landlords, lack of funds for tenant damages, substandard housing units, and the lack of adequate vacant rental units.
- b. Remedial Actions: The current approved Fair Market Rent value appears sufficient for a Voucher holder to find an affordable rental unit in the Amarillo area, yet, the rental market and lack of suitable vacant units may limit the availability of units. The City should continue to monitor this issue and develop programs to assist in bringing rental properties to standard condition, as well as developing new rental construction units to provide affordable housing that meets minimum housing standards.

3) Public Policy Factors

- a. No significant barriers to affordable housing were found to exist in the available public policies, however, information provided indicates a need for a regular review of development processes and costs.

There are no public policies that limit or affect the return on residential investments. However, although there does not appear to be any overt public policy barriers to affordable housing, regular reviews of taxes, fees, building codes, and zoning regulations continue to be necessary to ensure that unanticipated barriers do not develop. Additionally, this analysis is necessary to gauge what impact any future changes might have on accessibility to housing.

- b. **Concern:** Community Awareness – The general public are oftentimes unaware of their rights under Fair Housing laws. Discriminatory acts are often subtle and not easily detectable. People who experience discrimination are unaware of how simple it is to report the incident and do nothing. Providers of services (landlords, lenders, leasing agents) are sometimes confused or unclear on what the law requires. A review of advertising media (television, radio, newspapers) indicates that local housing providers, lenders, and insurers could be more diligent in including fair housing logos, equal opportunity statements, and diverse human models, and in offering bilingual advertising and services.

Remedial Actions: Knowledge and education of Fair Housing law and the community's available resources and assistance is critical. It is the Affirmative Marketing Goal of the City of Amarillo to ensure that organizations and individuals who normally might not apply for grants or for assistance because of their race, color, religion, sex, disability, familial status, or national origin know about the availability of assistance and have the opportunity to apply. Therefore, public notices should be placed in the local newspaper, public service announcements should be advertised through the local television stations, signs should be posted in public places, and public hearing notices should be posted on the City's bulletin boards at City Hall and on the City's website. Public hearings held to inform the general public when funds are available and what projects will be funded should include specific information on fair housing. The City should enhance its participation in Fair Housing Week and actively advertise and publicize information in low-income and minority impacted neighborhoods. Additionally, the City should notify local public service organizations regarding public hearings and meetings. Further, the public hearings should be routinely scheduled during City Council meetings which are televised on the local public access channel for viewing by the public. The City reported it has not received any fair housing complaints in recent years and should continue to monitor this issue and utilize training and testing to evaluate the occurrence of possible fair housing issues.

- c. **Concern:** Due to a continued lack of federal funding, the waiting list to receive Housing Choice Voucher rental assistance is approximately 48 months. Priorities are provided for working applicants, elderly individuals/families, and disabled individuals/families.

Remedial Actions: The City has no direct influence on the federal funding situation but should continue to be actively supportive of any efforts that could be made to relieve the funding situation.

Section 8: Oversight, Monitoring, and Maintenance of AI Record

It is the City's responsibility to provide oversight and monitoring of the federal requirements regarding fair housing and to maintain documentation regarding complaints, determinations, and progress made toward reducing barriers as discussed in Section 7 of this document.

This process has been performed under the coordination of the City of Amarillo Community Development Department. This department is the designated lead agency for the City with the responsibility for ongoing oversight, monitoring, self-evaluation, and reporting of achievements. As the responsible entity, this department will perform the following:

1. Continued referral of fair housing complaints to the HUD FHEO Division in the Ft. Worth Texas Regional Office.
2. Evaluation of the recommendations for remedial actions contained in this report and consult with other city departments and organizations as needed to determine the feasibility and schedule for implementation.
3. Continued support of Fair Housing outreach and education events and activities by incorporating and providing information to the public during public events and hearings, participating in Fair Housing recognition events, and sponsoring public service announcements with various media outlets.
4. Continued monitoring of organizations and subrecipients that are funded with the City's Community Development Block Grant (CDBG) funds and HOME Program funds to ensure compliance with Fair Housing and uniform federal accessibility standards.
5. Maintain the 2020 Analysis of Impediments and any updates and make copies available upon request.
6. Submit results of monitoring and oversight at the end of each program year through the submittal of the City's Consolidated Annual Performance and Evaluation Report (CAPER).