City of Salem and City of Keizer

Analysis of Impediments to Fair Housing Choice

City of Salem and the City of Keizer

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

EQUAL HOUSING
OPPORTUNITY

City of Salem
Urban Development Department
350 Commercial St. NE
Salem, OR 97301

Draft for 30 Day Public Review Beginning
October 11, 2019

Has Your Right to Fair Housing Been Violated?

If you feel you have experienced discrimination while seeking housing or in the housing industry, please contact:

Fair Housing Council of Oregon
1221 SW Yamhill St. #305
Portland, OR 97205
(503) 223-8197
http://fhco.org/index.php/report-discrimination

FHEO Housing Discrimination Hotline: 800-669-9777

U.S. Department of Housing and Urban Development
Form 903 Online Complaint in English:
https://portalapps.hud.gov/FHEO903/Form903/Form903Start.action

HUD Formulario 903 quejas en línea:
https://portalapps.hud.gov/AdaptivePages/HUD_Spanish/Espanol/complaint/complaint-details.htm

Portland HUD Field Office
Edith Green-Wendell Wyatt Federal Office Building
1220 SW 3rd Avenue #400
Portland, OR 97204
(971) 222-2600

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I. Executive Summary

OVERVIEW

Title VIII of the 1968 Civil Rights Act, also known as the Fair Housing Act, protects people from discrimination based on race, color, national origin, religion, sex, familial status, and disability when they are renting or buying a home, getting a mortgage, seeking housing assistance, or engaging in other housing related activities. The Act, and subsequent laws reaffirming its principles, seeks to overcome the legacy of segregation, unequal treatment, and historic lack of access to housing opportunity. There are several statutes, regulations, and executive orders that apply to fair housing, including the Fair Housing Act, the Fair Housing Amendments Act, and the Americans with Disabilities Act.[1]

Affirmatively furthering fair housing is defined in the Fair Housing Act as taking "meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics".[2] Specifically, affirmatively furthering fair housing requires that recipients of federal housing and urban development funds take meaningful actions to address housing disparities, including replacing segregated living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.[3] Furthering fair housing can involve developing affordable housing, removing barriers to affordable housing development in high opportunity areas, investing in neighborhood revitalization, preserving and rehabilitating existing affordable housing units, improving housing access in areas of concentrated poverty, and improving community assets.

ASSESSING FAIR HOUSING

Provisions to affirmatively further fair housing are long-standing components of the U.S. Department of Housing and Urban Development's (HUD's) housing and community development programs. These provisions come from Section 808(e)(5) of the Fair Housing Act, which requires that the Secretary of HUD administer federal housing and urban development programs in a manner that affirmatively furthers fair housing.[4]

In 1994, HUD published a rule consolidating plans for housing and community development programs into a single planning process. This action grouped the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grants (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) programs into the Consolidated Plan for Housing and Community Development, which then created a single application cycle. As a part of the consolidated planning process, and entitlement communities that receive such funds from HUD are required to submit to HUD certification that they are affirmatively furthering fair housing (AFFH).

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[1] https://www.hud.gov/program_offices/fair_housing_equal_opp/fair_housing_and_related_law
[2] § 5.152 Affirmatively Furthering Fair Housing
[3] § 5.152 Affirmatively Furthering Fair Housing
[4] 42 U.S.C.3601 et seq.

In July of 2015, HUD released a new AFFH rule which provided a format, a review process, and content requirements for the newly named "Assessment of Fair Housing", or AFH.[5] The assessment would now include an evaluation of equity, the distribution of community assets, and access to opportunity within the community, particularly as it relates to concentrations of poverty among minority racial and ethnic populations (R/ECAPs). Areas of opportunity are physical places within communities that provide things one needs to thrive, including quality employment, high performing schools, affordable housing, efficient public transportation, safe streets, essential services, adequate parks, and full-service grocery stores. Areas lacking opportunity, then, have the opposite of these attributes.

The AFH includes measures of segregation and integration, while also providing some historical context about how such concentrations became part of the community's legacy. Together, these considerations were intended to better inform public investment decisions that would lead to amelioration or elimination of segregation, enhance access to opportunity, promote equity, and hence, housing choice. Equitable development requires thinking about equity impacts at the front end, prior to the investment occurring. That thinking involves analysis of economic, demographic, and market data to evaluate current issues for citizens who may have previously been marginalized from the community planning process. All this would be completed by using an on-line Assessment Tool.

However, on January 5, 2018, HUD issued a notice that extended the deadline for submission of an AFH by local government consolidated plan program participants to their next AFH submission date that falls after October 31, 2020.[6] Then, on May 18, 2018, HUD released three notices regarding the AFFH; one eliminated the January 5, 2018, guidance; a second withdrew the on-line Assessment Tool for local government program participants; and, the third noted that the AFFH certification remains in place. HUD went on to say that the AFFH databases and the AFFH Assessment Tool guide would remain available for the AI; and, encouraged jurisdictions to use them, if so desired.

Hence, the AI process involves a thorough examination of a variety of sources related to housing, the fair housing delivery system, housing transactions, locations of public housing authorities, areas having racial and ethnic concentrations of poverty and access to opportunity. The development of an AI also includes public input, and interviews with stakeholders, public meetings to collect input from citizens and interested parties, distribution of draft reports for citizen review, and formal presentations of findings and impediments, along with actions to overcome the identified fair housing issues and impediments.

In accordance with the applicable statutes and regulations governing the Consolidated Plan, Salem-Keizer certifies that they will affirmatively further fair housing, by taking appropriate actions to overcome the effects of any impediments identified in the Analysis of Impediments to Fair Housing Choice and maintaining records that reflect the analysis and actions taken in this regard.

OVERVIEW OF FINDINGS

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[5] 80 FR 42271. https://www.federalregister.gov/documents/2015/07/16/2015-17032/affirmatively-furthering-fair-housing
[6] 83 FR 683 (January 5, 2018)

As a result of detailed demographic, economic, and housing analysis, along with a range of activities designed to foster public involvement and feedback, Salem-Keizer identified a series of fair housing issues/impediments and other factors that contribute to the creation or persistence of those issues.

Table I.1, on the following page, provides a list of the contributing factors that have been identified as causing these fair housing issues/impediments and prioritizes them according to the following criteria:

1. High: Factors that have a direct and substantial impact on fair housing choice

2. Medium: Factors that have a less direct impact on fair housing choice, or that the Cities have limited authority to mandate change

3. Low: Factors that have a slight or largely indirect impact on fair housing choice, or that the Cities have limited capacity to address

ADDITIONAL FINDINGS

In addition to the table, there are several significant findings or conclusions summarized here. R/ECAPs are geographic areas that contain at least 50 percent minority, or non-white, population, and at least a 40 percent poverty rate. Salem-Keizer has one (1) R/ECAP.

African American and Hispanic households have somewhat lower access to areas of opportunity, including access to proficient schools, low poverty areas, and labor market engagement.

Hispanic households have a higher incidence of housing problems. Native American and as well as Hispanic households have a higher incidence of mortgage denials in Salem-Keizer.

The survey and public input revealed there is a continued need for fair housing outreach and education in Salem-Keizer.

Table I.1
Contributing Factors
Salem-Keizer

Contributing Factors	Priority	Justification
Discriminatory patterns in lending	High	As demonstrated by 2008-2017 HMDA data, American Indian and Hispanic loan denial rates exceeded 21.6 percent and 17.6 percent respectively, compared with 11.5 percent for white households. Denial rates are also higher in areas of Central Salem
Access to proficient schools	Low	School proficiency index is lower for black, Native American, and Hispanic populations than white school proficiency, indicating inequitable access for black households to proficient schools. However, Salem-Keizer has little control over increasing access on a large scale.
Access to low poverty areas	High	Black and Hispanic households have lower access to low poverty areas than white households in Salem-Keizer, as demonstrated by low poverty indices. These areas were primarily found in the central part of Salem.
Access to labor market engagement	Low	Black and Hispanic households have lower access to labor market engagement as indicated by the Access to Opportunity index. However, Salem-Keizer has little control over impacting labor market engagement on a large scale.
Access to public transportation	Low	The Fair Housing Survey indicated that a lack of access to public services has a significantly negative impact in Salem-Keizer. However, the Cities have little control over increasing access to public transportation on a large scale.
Moderate levels of segregation	Medium	Black and Native Hawaiian households have a moderate level of segregation. However, the Native Hawaiian population represents a small proportion of the population.
Insufficient affordable housing in a range of unit sizes	High	The rate of cost burden in Salem-Keizer exceeds 35.4 percent. This impacts over 25,000 households city-wide. Additionally, those under 30 percent HAMFI face housing problems at a rate of 80.0 percent.
Failure to make reasonable accommodations	High	Failure to make reasonable accommodations is the most common fair housing issue in fair housing complaints with cause in the Salem-Keizer Area.
Hispanic households tend to have higher rates of housing problems	High	Some 52.6 percent of Hispanic households experienced cost burdens or severe cost burdens in Salem, according to CHAS data, compared to the jurisdiction average of 38.7 percent
Lack of fair housing infrastructure	High	The fair housing survey and public input indicated a lack of collaboration among agencies to support fair housing.
Insufficient fair housing education	High	The fair housing survey and public input indicated a lack of knowledge about fair housing and a need for education.

FAIR HOUSING ISSUES, CONTRIBUTING FACTORS, AND PROPOSED ACHIEVEMENTS

Table I.2, on the following page, summarizes the fair housing issues/impediments and contributing factors. It includes metrics and milestones and a timeframe for achievements.

Table I.2
Fair Housing Issues, Contributing Factors, and Recommended Actions
Salem-Keizer

Fair Housing Issues/ Impediments	Contributing Factors	Recommended Action to be Taken
Segregation	Moderate levels of segregation	Review zoning and Comprehensive Plan for potential barriers to affordable housing options, including density maximums and lot size requirements; continue recommending appropriate amendments each year, over the next five (5) years.
Disparities in Access to Opportunity	Access to proficient schools	Review opportunities annually to increase funding sources for additional low-income housing in high opportunity areas.
	Access to low poverty areas	Explore opportunities annually for redevelopment or rehabilitation of residential properties in high opportunity areas.
	Labor market engagement	
	Access to public transportation	Consult with local Transportation Agency, Chariots, to increase access to transportation routes. Review the need to additional routes in low opportunity areas annually.
Disproportionate Housing Needs	Hispanic households tend to have higher rates of cost burdens	Encourage the development of future affordable housing sites in high opportunity areas annually.
		Review zoning and Comprehensive Plan for potential barriers to affordable housing options, including density maximums and lot size requirements; continue recommending appropriate amendments each year, over the next five (5) years.
	Insufficient affordable housing in a range of unit sizes	
	Discriminatory patterns in lending	Continue investing CPD funds geographically in areas of central Salem to increase access to affordable housing. Rehabilitate 5 owner occupied and 15 renter occupied units annually.
Publicly Supported Housing	Insufficient affordable housing in a range of unit sizes	Locate any future publicly supported housing units in high opportunity areas. Review annually over the next five (5) years.
		Research opportunities for increased funding options annually.
Disability and Access	Insufficient accessible affordable housing	Review development standards for accessible housing and inclusionary policies for accessible housing units; continue recommending appropriate amendments each year, over the next five (5) years.
	Failure to make reasonable accommodations	
Fair Housing Enforcement and Outreach	Insufficient fair housing education	Promote fair housing education through annual or biannual workshops.
	Discriminatory patterns in lending	Promote outreach and education related to credit for prospective homebuyers annually.

II. Community Participation Process

The following section describes the community participation process undertaken for the 2020 City of Salem Analysis of Impediments to Fair Housing Choice.

A. Overview

The outreach process included the 2019 Fair Housing Survey and a Fair Housing Forum. A public hearing will be held in connection with the Consolidated Plan and pother associated policies.

The Fair Housing Survey was distributed in printed and electronic versions. As of today, 56 responses have been received. The online survey will remain open for additional input until April 2020.

A Fair Housing Forum was held on August 19, 2019 to gather feedback and input from members of the public.

The Draft for Public Review AI was made available on October 11, 2019 and a 30-day public input period was initiated.

A public hearing will be held during the public review period in order to gather feedback and input on the draft Analysis of Impediment. After the close of the public review period and inspection of comments received, the Final Report will be made available to the public.

B. The 2019 Fair Housing Survey

The purpose of the survey, a relatively qualitative component of the AI, was to gather insight into knowledge, experiences, opinions, and feelings of stakeholders and interested citizens regarding fair housing as well as to gauge the ability of informed and interested parties to understand and affirmatively further fair housing. Many individuals and organizations throughout Salem-Keizer were invited to participate. At the date of this document, some 56 responses were received. A complete set of survey responses can be found in *Section IV.I Fair Housing Survey Results*.

C. Fair Housing Forums

The purpose of the meeting was to provide preliminary information gathered for the Analysis of Impediment (AI) to residents and stakeholders and offer the opportunity to provide feedback and insight into fair housing in Salem-Keizer. A complete transcript of the proceedings will be included in the appendix.

D. The Final Public Review Process

A 30-day public review process begins on October 11, 2019. Public comments received during this period will be included in the Appendix of the final document.

III. Assessment of Past Goals and Actions

An Analysis of Impediments to Fair Housing Choice for the City of Salem was last completed five years ago.[7] A summary of identified impediments and recommendations from the September 2014 document are discussed below.

A. Past Impediments and Actions

FEES AND CHARGES

In the City of Salem's *Organizational/Business Survey,* 75% of respondents stated that the primary barrier to their clients accessing affordable housing were fees and charges. Some of the reasons that this is a barrier for their clients include: inability to qualify for jobs with adequate salaries (full-time, permanent), lack of income, increase in rental application fees, and coming up with move-in costs (i.e. deposit and first month's rent). This is consistent with the overwhelming response to the *Organizational/Business Survey,* the *Housing and Community Needs Survey,* and documentation from other reports such as the *Housing Needs Assessment* (Mid-Willamette Valley Council of Governments, City of Salem) stating that the highest priority for the next five years is funding of job training programs and job creation projects so that persons are able to pay the fees associated with housing.

LIMITATIONS

In the City of Salem's *Organizational/Business Survey,* 50% of respondents indicated that the primary barriers to their clients accessing affordable housing are limitations. The three primary limitations listed in the survey response were criminal record, negative rental history, and alcohol and drug issues. Additionally, through this analysis, it appears there is a significant limitation for persons with disabilities. As indicated in the fair housing complaints, this population reports more frequently violations of fair housing. Disabilities may also limit the number of units that the person can live in due to accessibility requirements and the costs associated to make reasonable accommodations. Other limitations listed included: limited English proficiency, lack of culturally appropriate services, gender status (transgendered), fair market rent (FMR), cycle of abuse and poverty, and mental illness.

LIMITED AVAILABILITY

In responses to the City of Salem's *Organizational/Business Survey*, Limited Availability was the third most frequently reported barrier for their clients accessing affordable housing. The reasons listed for limited availability included the following: lack of affordable units for persons with disabilities, limited funding, lack of affordable housing in desirable areas, long wait lists, and policies affecting return on residential investment. The need for additional affordable housing was also indicated in the Housing Needs Analysis (Mid-Willamette Valley Council of Governments and the City of Salem). The overwhelming type indicated through these analyses and national housing analyses are "aging in place" units. "Aging in place" units would meet the needs of all populations including the elderly and the disabled and ensure lower vacancy rates.

OTHER IMPEDIMENTS

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[7] City of Salem CDBG. Analysis of Impediments to Fair Housing, September 2014.

The 2014 Impediments analysis identified numerous barriers to fair housing in Salem-Keizer. Several barriers to affordable housing were also identified in the Consolidated Plan to be problems intensifying the lack of access and availability to fair housing choices. Some of the barriers to affordable housing include:

- Job Training and Higher Education
- Job Creation
- Lack of "Aging in Place" units
- Lack of 1-2-bedroom Units
- Lack of coordinated housing (integrated self-sufficiency programs)

FAIR HOUSING ACTIVITIES

The following fair housing actions were described in the City's 2018 Consolidated Annual Performance and Evaluation Report (CAPER):

Impediments to Fair Housing Choice are defined as any actions, omissions, or decisions taken because of protected class status that have an effect of restricting housing choice or the availability of housing choice. The federally protected classes are race, color, religion, sex, disability, familial status, or national origin. The State of Oregon adds the following classes as protected classes within the State of Oregon: marital status, source of income, sexual orientation including gender identity, honorably discharged veterans/military status, and domestic violence. At a local level, age is added. The analysis reviews the laws, regulations, administrative procedures, and practices of the entitlement community. It assesses how laws affect the location, availability, and accessibility of housing while considering conditions, both public and private, affecting fair housing choice for all protected classes within the jurisdiction.

Efforts for 2018 – 2019 program year provided by the Fair Housing Council of Oregon performed under contract with the City:

Education: Trainings / Outreach
Eight fair housing trainings and/or outreach opportunities were conducted during the year. Participants included City of Salem staff, residents, social service agencies, nonprofit housing providers, and shelter providers. Some of the issues covered included fair housing basics, recent changes in the law related to criminal history screening and harassment, and fair housing requirements for shelters. KPCN Radio hour interview was conducted in November.

Enforcement: Intakes and Referrals
FHCO screened 104 inquiries i.e., intakes, from Salem residents on the housing discrimination hotline.

Intake Issues Resolved / Open:
- Allegation of eviction based upon race.
- Reasonable accommodation
- Porting due to domestic violence.

FHCO Tester Pool

FHCO conducted tester trainings were held in Salem.

IV. Fair Housing Analysis

This section presents demographic, economic, and housing information. Data were used to analyze a broad range of socio-economic characteristics, including population growth, race, ethnicity, disability, employment, poverty, and housing trends; these data are also available by Census tract, and are shown in geographic maps. Ultimately, the information presented in this section illustrates the underlying conditions that shape housing market behavior and housing choice Salem-Keizer. Data presented below primarily reflects the entirety of Salem and Keizer and is referenced as Salem-Keizer.

LEAD AGENCY

The City of Salem, led by the Federal Progams staff housed in the Urban Development Department, is the lead undertaking this Analysis of Impediments to Fair Housing Choice.

A. Socio-Economic Overview

This section presents demographic, economic, and housing information that is drawn from the 2010 Census and American Community Survey (ACS) estimates unless otherwise noted. Data were used to analyze a broad range of socio-economic characteristics, including population growth, race, ethnicity, disability, employment, poverty, and housing trends; these data are also available by Census tract, and are shown in geographic maps. Ultimately, the information presented in this section illustrates the underlying conditions that shape housing market behavior and housing choice in Salem-Keizer.

In the 1980, 1990, and 2000 decennial Censuses, the Census Bureau released several tabulations in addition to the full SF1 100 percent count data including the one-in-six SF3 sample. These additional samples, such as the SF3, asked supplementary questions regarding income and household attributes that were not asked in the 100 percent count. In the 2010 decennial Census, the Census Bureau did not collect additional sample data, such as the SF3, and thus many important housing and income concepts are not available in the 2010 Census.

To study these important concepts the Census Bureau distributes the American Community Survey every year to a sample of the population and quantifies the results as one, three- and five-year averages. The one-year sample only includes responses from the year the survey was implemented, while the five-year sample includes responses over a five-year period. Since the five-year estimates include more responses, the estimates can be tabulated down to the Census tract level and are considered more robust than the one- or three- year sample estimates.

Table IV.1 Population Estimates City of Salem Census Population Estimates		
Year	Population	Percent Yearly Change
2000	137,291	.
2001	139,308	1.5%
2002	141,728	1.7%
2003	143,281	1.1%
2004	144,619	0.9%
2005	146,011	1.0%
2006	148,135	1.5%
2007	150,362	1.5%
2008	151,841	1.0%
2009	153,654	1.2%
2010	154,637	0.6%
2011	156,146	1.0%
2012	157,369	0.8%
2013	158,843	0.9%
2014	160,721	1.2%
2015	163,251	1.6%
2016	166,599	2.1%
2017	169,850	2.0%
2018	173,442	2.1%

DEMOGRAPHICS

POPULATION

Table IV.1 shows the population for the City of Salem. The population in the increased from 154,637 persons in 2010 to 173,442 persons in 2018, or by 12 percent.

Table IV.2, at right, shows the population for the City of Keizer. As can be seen, the population in the City of Keizer increased from 36,478 persons in 2010 to 39,271 persons in 2017, or by 8.8 percent.

RACE AND ETHNICITY

Population by race and ethnicity through 2017 is shown in Table IV.3 for Salem-Keizer. The white population represented 81.9 percent of the population in 2017, compared with black populations accounting for 1.2 percent of the population in 2017. Hispanic households represented 22.0 percent of the population in 2017.

Table IV.2 Population Estimates City of Keizer Census Population Estimates		
Year	Population	Percent Yearly Change
2000	32,205	.
2001	32,625	1.3%
2002	33,138	1.6%
2003	33,527	1.2%
2004	33,799	0.8%
2005	34,199	1.2%
2006	34,785	1.7%
2007	35,267	1.4%
2008	35,708	1.3%
2009	36,194	1.4%
2010	36,478	0.8%
2011	36,687	0.6%
2012	36,798	0.3%
2013	36,689	-0.3%
2014	37,039	1.0%
2015	37,596	1.5%
2016	38,765	3.1%
2017	39,271	1.3%

Table IV.3 Population by Race and Ethnicity Salem-Keizer 2010 Census & 2017 Five-Year ACS				
Race	2010 Census		2017 Five-Year ACS	
	Population	% of Total	Population	% of Total
White	152,323	79.7%	165,136	81.9%
Black	2,572	1.3%	2,511	1.2%
American Indian	2,764	1.4%	2,087	1.0%
Asian	4,814	2.5%	5,042	2.5%
Native Hawaiian/ Pacific Islander	1,690	0.9%	2,583	1.3%
Other	18,836	9.9%	10,070	5.0%
Two or More Races	8,116	4.2%	14,135	7.0%
Total	191,115	100.0%	201,564	100.0%
Non-Hispanic	153,063	80.1%	157,202	78.0%
Hispanic	38,052	19.9%	44,362	22.0%

The change in race and ethnicity between 2010 and 2017 is shown in Table IV.4. During this time, the total non-Hispanic population was 157,202 persons in 2017. The Hispanic population was 44,362 persons.

Table IV.4 Population by Race and Ethnicity Salem-Keizer 2010 Census & 2017 Five-Year ACS				
Race	**2010 Census**		**2017 Five-Year ACS**	
	Population	**% of Total**	**Population**	**% of Total**
Non-Hispanic				
White	136,742	89.3%	138,246	87.9%
Black	2,329	1.5%	2,320	1.5%
American Indian	2,123	1.4%	1,306	0.8%
Asian	4,703	3.1%	4,930	3.1%
Native Hawaiian/ Pacific Islander	1,653	1.1%	2,548	1.6%
Other	268	0.2%	183	0.1%
Two or More Races	5,245	3.4%	7,669	4.9%
Total Non-Hispanic	**153,063**	**100.0%**	**157,202**	**100.0%**
Hispanic				
White	15,581	40.9%	26,890	60.6%
Black	243	0.6%	191	0.4%
American Indian	641	1.7%	781	1.8%
Asian	111	0.3%	112	0.3%
Native Hawaiian/ Pacific Islander	37.0	0.1%	35.0	0.1%
Other	18,568	48.8%	9,887	22.3%
Two or More Races	2,871	7.5%	6,466	14.6%
Total Hispanic	**38,052**	**100.0**	**44,362**	**100.0%**
Total Population	**191,115**	**100.0%**	**201,564**	**100.0%**

The number of foreign born persons is shown in Table IV.5. An estimated 7.0 percent of the population was born in Mexico, some 0.4 percent were born in Oceania n.e.c, and another 0.4 percent were born in China excluding Hong Kong and Taiwan.

Table IV.5 Place of Birth for the Foreign-Born Population Salem-Keizer 2017 Five-Year ACS			
Number	**Country**	**Number of Persons**	**Percent of Total Population**
#1 country of origin	Mexico	14,168	7.0%
#2 country of origin	Oceania n.e.c	806	0.4%
#3 country of origin	China excluding Hong Kong and Taiwan	761	0.4%
#4 country of origin	Canada	709	0.4%
#5 country of origin	Philippines	593	0.3%
#6 country of origin	Ukraine	507	0.3%
#7 country of origin	Vietnam	427	0.2%
#8 country of origin	Germany	386	0.2%
#9 country of origin	India	353	0.2%
#10 country of origin	Russia	351	0.2%

Limited English Proficiency and the language spoken at home are shown in Table IV.6. An estimated 6.8 percent of the population speaks Spanish at home, followed by 0.5 percent speaking Other Asian and Pacific Island languages.

Table IV.6 Limited English Proficiency and Language Spoken at Home Salem-Keizer 2017 Five-Year ACS			
Number	**Country**	**Number of Persons**	**Percent of Total Population**
#1 LEP Language	Spanish	12,755	6.8%
#2 LEP Language	Other Asian and Pacific Island languages	938	0.5%
#3 LEP Language	Chinese	650	0.3%
#4 LEP Language	Russian, Polish, or other Slavic languages	504	0.3%
#5 LEP Language	Vietnamese	340	0.2%
#6 LEP Language	Other Indo-European languages	259	0.1%
#7 LEP Language	Korean	103	0.1%
#8 LEP Language	German or other West Germanic languages	61	0%
#9 LEP Language	Tagalog	59	0%
#10 LEP Language	French, Haitian, or Cajun	46	0%

EDUCATION

Education and employment data, as estimated by the 2017 ACS, is presented in Table IV.7. In 2017, some 91,120 persons were employed and 6,575 were unemployed. This totaled a labor force of 97,695 persons. The unemployment rate for Salem-Keizer was estimated to be 6.7 percent in 2017.

Table IV.7 Employment, Labor Force and Unemployment Salem-Keizer 2017 Five-Year ACS Data	
Employment Status	**2017 Five-Year ACS**
Employed	91,120
Unemployed	6,575
Labor Force	**97,695**
Unemployment Rate	6.7%

In 2017, 90.9 percent of households in Salem-Keizer had a high school education or greater.

Table IV.8 High School or Greater Education Salem-Keizer 2017 Five-Year ACS Data	
Education Level	**Households**
High School or Greater	65,966
Total Households	72,590
Percent High School or Above	**90.9%**

As seen in Table IV.9, some 26.2 percent of the population had a high school diploma or equivalent, another 36.5 percent have some college, 15.3 percent have a Bachelor's Degree, and 8.8 percent of the population had a graduate or professional degree.

Table IV.9
Educational Attainment
Salem-Keizer
2017 Five-Year ACS Data

Education Level	Population	Percent
Less Than High School	20,153	13.2%
High School or Equivalent	39,859	26.2%
Some College or Associates Degree	55,549	36.5%
Bachelor's Degree	23,289	15.3%
Graduate or Professional Degree	13,471	8.8%
Total Population Above 18 years	**152,321**	**100.0%**

ECONOMICS

LABOR FORCE

In 2017, 73,871 persons were employed and 5,361 were unemployed, for a total labor force of 79,232 persons according to 2017 Five-Year ACS data. The unemployment rate for the City of Salem was 6.8 percent in 2017.

Table IV.10
Employment, Labor Force and Unemployment
City of Salem
2017 Five-Year ACS Data

Employment Status	2017 Five-Year ACS
Employed	73,871
Unemployed	5,361
Labor Force	**79,232**
Unemployment Rate	6.8%

Table IV.11, shows BLS labor force statistics for the City of Salem from 1990 to the present. Over the entire series, the lowest unemployment rate occurred in 2017 with an unemployment rate of 4.4 percent. The highest level of unemployment occurred during 2008 and 2009, rising from a rate of 6.5 percent to a rate of 10.6 percent. This compared to a statewide low of 4.1 in 2017 and statewide high of 11.3 percent in 2009. Over the last year, the unemployment rate in the City of Salem remained unchanged at 4.4 percent in 2017 and 2018, compared to a statewide unemployment rate in 2017 of 4.1 percent and 4.2 percent in 2018.

Table IV.12, shows the labor force statistics for City of Keizer from 1990 to the present. Over the entire series the lowest unemployment rate occurred in 2017 with a rate of 4.3 percent. The highest level of unemployment occurred during 2010 rising to a rate of 11.2 percent. This compared to a statewide low of 4.1 percent in 2017 and statewide high of 11.3 percent in 2009. Over the last year, the unemployment rate in the City of Keizer remain unchanged from 4.3 percent in 2017 and in 2018, compared to a statewide unemployment rate of 4.1 in 2017 and 4.2 percent in 2018.

Diagram IV.1, shows employment and labor force data for the City of Salem. The difference between the two lines represents the number of unemployed persons. In the most recent year, employment stood at 76,393 persons, with the labor force reaching 79,911 persons, indicating a total of 3,518 unemployed persons.

Table IV.11 Labor Force Statistics City of Salem 1990 - 2018 BLS Data				
Year	**City of Salem**				**Statewide**
	Unemployment	**Employment**	**Labor Force**	**Unemployment Rate**	**Unemployment Rate**
1990	2,983	50,751	53,734	5.6%	5.5%
1991	3,310	51,192	54,502	6.1%	6.4%
1992	3,942	52,276	56,218	7.0%	7.4%
1993	4,194	54,463	58,657	7.2%	7.0%
1994	3,333	56,779	60,112	5.5%	5.4%
1995	2,946	57,848	60,794	4.8%	4.9%
1996	3,556	58,731	62,287	5.7%	5.7%
1997	3,683	59,243	62,926	5.9%	5.7%
1998	3,932	60,708	64,640	6.1%	5.7%
1999	3,987	61,918	65,905	6.0%	5.5%
2000	4,059	65,433	69,492	5.8%	5.1%
2001	4,749	64,669	69,418	6.8%	6.4%
2002	5,404	64,856	70,260	7.7%	7.5%
2003	6,019	65,238	71,257	8.4%	8.1%
2004	5,718	65,507	71,225	8.0%	7.3%
2005	4,643	67,108	71,751	6.5%	6.2%
2006	3,999	68,938	72,937	5.5%	5.3%
2007	3,965	69,802	73,767	5.4%	5.2%
2008	4,887	70,525	75,412	6.5%	6.5%
2009	8,122	68,477	76,599	10.6%	11.3%
2010	8,049	67,781	75,830	10.6%	10.6%
2011	7,705	68,064	75,769	10.2%	9.5%
2012	7,152	67,221	74,373	9.6%	8.8%
2013	6,293	66,742	73,035	8.6%	7.9%
2014	5,287	68,591	73,878	7.2%	6.8%
2015	4,477	71,532	76,009	5.9%	5.6%
2016	3,909	74,529	78,438	5.0%	4.8%
2017	3,518	76,393	79,911	4.4%	4.1%
2018	3,584	77,086	80,670	4.4%	4.2%

Diagram IV.1
Employment and Labor Force
City of Salem
1990 – 2017 BLS Data

Year	City of Keizer				Statewide Unemployment Rate
	Unemployment	Employment	Labor Force	Unemployment Rate	
1990	6,366	110,646	117,012	5.4%	5.5%
1991	7,101	111,607	118,708	6.0%	6.4%
1992	8,518	113,921	122,439	7.0%	7.4%
1993	9,077	118,726	127,803	7.1%	7.0%
1994	7,207	123,599	130,806	5.5%	5.4%
1995	6,375	125,881	132,256	4.8%	4.9%
1996	7,701	127,718	135,419	5.7%	5.7%
1997	7,956	128,693	136,649	5.8%	5.7%
1998	8,477	131,730	140,207	6.0%	5.7%
1999	8,598	134,324	142,922	6.0%	5.5%
2000	7,966	137,280	145,246	5.5%	5.1%
2001	9,295	135,571	144,866	6.4%	6.4%
2002	10,607	136,029	146,636	7.2%	7.5%
2003	11,819	136,675	148,494	8.0%	8.1%
2004	11,189	136,940	148,129	7.6%	7.3%
2005	9,592	138,232	147,824	6.5%	6.2%
2006	8,465	141,466	149,931	5.6%	5.3%
2007	8,182	143,586	151,768	5.4%	5.2%
2008	10,305	145,070	155,375	6.6%	6.5%
2009	17,604	140,497	158,101	11.1%	11.3%
2010	17,324	138,026	155,350	11.2%	10.6%
2011	16,214	138,379	154,593	10.5%	9.5%
2012	15,019	135,549	150,568	10.0%	8.8%
2013	13,011	134,308	147,319	8.8%	7.9%
2014	10,966	138,180	149,146	7.4%	6.8%
2015	9,149	143,517	152,666	6.0%	5.6%
2016	7,955	149,485	157,440	5.1%	4.8%
2017	6,938	153,304	160,242	4.3%	4.1%
2018	6,960	154,716	161,676	4.3%	4.2%

Table IV.12
Labor Force Statistics
City of Keizer
1990 - 2018 BLS Data

REAL AVERAGE EARNINGS: MARION COUNTY

Diagram IV.2 shows real average earnings per job for Marion County from 1990 to 2017. The average earning per job for Marion County was $48,413, which was lower than the statewide average of $50,768 over the same period.

Diagram IV.2
Real Average Earnings Per Job
Marion County
BEA Data 1990 - 2017

Average Earnings Per Job
Marion County
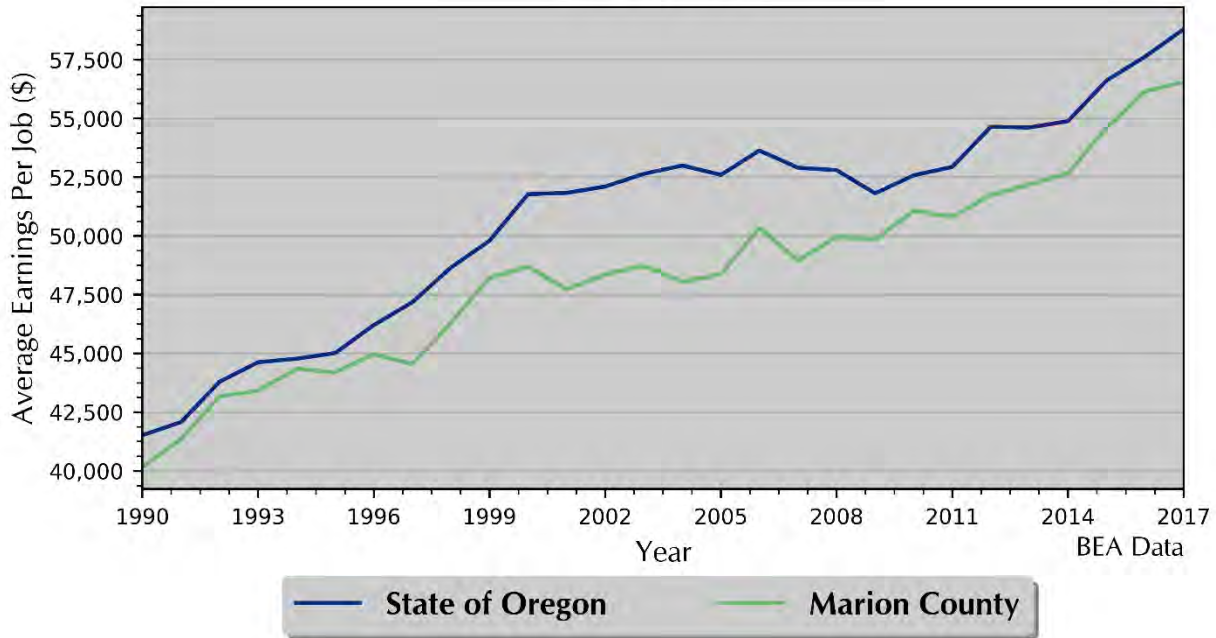
POVERTY

Poverty is the condition of having insufficient resources or income. In its extreme form, poverty is a lack of basic human needs, such as adequate and healthy food, clothing, housing, water, and health services. The Census

Table IV.13				
Poverty by Age				
Salem-Keizer				
2000 Census SF3 & 2017 Five-Year ACS Data				
Age	**2000 Census**		**2017 Five-Year ACS**	
	Persons in Poverty	**% of Total**	**Persons in Poverty**	**% of Total**
Under 6	3,671	16.5%	3,911	12.9%
6 to 17	4,506	20.3%	6,444	21.2%
18 to 64	12,623	56.9%	17,966	59.1%
65 or Older	1,403	6.3%	2,069	6.8%
Total	**22,203**	**100.0%**	**30,390**	**100.0%**
Poverty Rate	**13.8%**	**.**	**15.7%**	**.**

Bureau uses a set of money income thresholds that vary by family size and composition to determine who is in poverty. If a family's total income is less than the family's threshold, then every individual in the family is considered in poverty. The poverty thresholds are updated for inflation using the Consumer Price Index (CPI-U) and do not vary geographically.[8] The sources of income used to compute poverty status includes money income before taxes and does not include capital gains or noncash benefits, such as public housing or food stamps.

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[8] U.S. Census. How the Census Bureau Measures Poverty. https://www.census.gov/topics/income-poverty/poverty/guidance/poverty-measures.html

The rate of poverty for Salem-Keizer is shown in Table IV.13. In 2017, there were an estimated 30,390 persons living in poverty. This represented a 15.7 percent poverty rate, compared to 13.8 percent poverty in 2000. In 2017, some 12.9 percent of those in poverty were under age 6, and 6.8 percent were 65 or older.

Diagram IV.3
Poverty Rates
Marion County
SAIPE Estimates 2000 – 2017

HOUSING

BUILDING PERMITS

The Census Bureau reports building permit authorizations and "per unit" valuation of building permits by county annually. Single-family construction usually represents most residential development in the county. Single-family building permit authorizations in the City of Salem increased from 211 authorizations in 2010 to 319 authorizations in 2017, as shown in Table IV.14. The real value of single-family building permits increased from $242,987 in 2010 to $287,809 in 2017. Additional details for the City of Keizer are given in Table IV.15.

Table IV.14 Building Permits and Valuation City of Salem Census Bureau Data, 1980–2018							
	Authorized Construction in Permit Issuing Areas					Per Unit Valuation, (Real 2017$)	
Year	Single-Family	Duplex Units	Tri- and Four-Plex	Multi-Family Units	Total Units	Single-Family Units	Multi-Family Units
1980	574	46	8.0	200	828	$116,191	$35,718
1981	298	12.0	15.0	94	419	$116,187	$49,129
1982	123	4.0	0	0	127	$101,115	0
1983	154	0	8.0	107	269	$109,461	$43,445
1984	142	12.0	4.0	40	198	$109,393	$36,121
1985	154	2.0	0	56	212	$109,569	$27,811
1986	286	18.0	3.0	86	393	$108,474	$28,598
1987	367	12.0	4.0	40	423	$107,547	$47,872
1988	351	30.0	44.0	390	815	$103,197	$32,573
1989	520	34.0	23.0	562	1,139	$109,030	$29,587
1990	482	40.0	12	489	1,023	$123,298	$37,683
1991	433	50.0	39.0	253	775	$131,858	$46,036
1992	589	24.0	58.0	304	975	$145,220	$81,938
1993	598	50.0	18.0	413	1,079	$169,295	$51,149
1994	575	36	4.0	72	687	$185,141	$56,450
1995	555	72	54	469	1,150	$190,606	$56,387
1996	687	62	28.0	750	1,527	$188,492	$59,060
1997	629	44	15	464	1,152	$201,537	$60,636
1998	545	44	38.0	259	886	$216,967	$55,934
1999	573	48.0	6.0	125	752	$167,582	$59,258
2000	516	6.0	36.0	103	661	$165,131	$52,874
2001	526	4.0	21.0	280	831	$194,215	$65,044
2002	636	8.0	12.0	154	810	$174,259	$73,715
2003	668	12.0	4.0	30	714	$182,675	$56,676
2004	814	22.0	46.0	327	1,209	$196,874	$71,590
2005	828	32.0	28.0	164	1,052	$212,349	$68,680
2006	594	26.0	25.0	222	867	$200,144	$66,983
2007	543	30.0	6.0	193	772	$291,328	$90,892
2008	269	18.0	0	60	347	$252,678	$113,694
2009	237	4.0	3.0	158	402	$248,556	$104,913
2010	211	6.0	6.0	9	232	$242,987	$118,385
2011	160	2.0	0	108	270	$242,179	$102,953
2012	179	2.0	12.0	186	379	$245,677	$104,997
2013	283	2.0	0	292	577	$244,673	$104,181
2014	270	10.0	4.0	7	291	$284,323	$74,269
2015	271	4.0	0	165	440	$298,493	$97,640
2016	302	24.0	4.0	462	792	$290,403	$116,487
2017	319	22.0	0	633	974	$287,809	$101,569

	Table IV.15 Building Permits and Valuation City of Keizer Census Bureau Data, 1980–2018						
Year	Authorized Construction in Permit Issuing Areas					Per Unit Valuation, (Real 2017$)	
	Single-Family	Duplex Units	Tri- and Four-Plex	Multi-Family Units	Total Units	Single-Family Units	Multi-Family Units
1980	0	0	0	0	0	$0	$0
1981	0	0	0	0	0	$0	$0
1982	0	0	0	0	0	$0	$0
1983	33	0	0	0	33	$92,815	$0
1984	42	0	0	0	42	$84,899	$0
1985	31	0	4.0	0	35	$88,442	$0
1986	84	0	0	0	84	$115,213	$0
1987	85	0	0	0	85	$101,237	$0
1988	82	0	0	36	118	$107,497	$33,409
1989	139	0	0	52	191	$119,764	$89,928
1990	215	2.0	8	64	289	$136,260	$24,380
1991	222	22.0	7.0	107	358	$133,883	$32,591
1992	200	38.0	17.0	50	305	$141,482	$48,728
1993	211	46.0	6.0	99	362	$143,278	$61,482
1994	261	34	41.0	84	420	$154,944	$61,345
1995	259	72	31	56	418	$187,561	$79,740
1996	263	64	17.0	64	408	$187,375	$72,531
1997	259	24	4	40	327	$199,297	$74,746
1998	297	20	4.0	144	465	$188,624	$84,631
1999	241	16.0	0	0	257	$198,495	$0
2000	257	14.0	8.0	36	315	$175,624	$71,029
2001	102	6.0	0	8	116	$164,696	$76,197
2002	198	6.0	0	64	268	$252,021	$115,665
2003	96	12.0	8.0	8	124	$249,663	$106,048
2004	125	18.0	16.0	0	159	$244,738	$0
2005	69	6.0	8.0	0	83	$263,287	$0
2006	56	4.0	0	198	258	$259,779	$103,901
2007	65	2.0	0	0	67	$245,921	$0
2008	48	2.0	3.0	20	73	$235,115	$79,440
2009	50	0	3.0	44	97	$246,458	$94,255
2010	34	0	0	14	48	$228,777	$109,725
2011	15	0	0	0	15	$267,549	$0
2012	21	2.0	0	0	23	$230,272	$0
2013	51	0	0	0	51	$250,714	$0
2014	56	0	0	69	125	$267,530	$104,243
2015	107	0	0	180	287	$270,702	$108,636
2016	55	0	0	12	67	$279,067	$114,556
2017	32	2.0	0	11	45	$277,276	$121,486

These data are illustrated for the City of Salem in the Diagrams on the following page. While single-family production has been lowering in recent years, values have continued to rise. There has been a notable increase in the number of apartment units produced in recent years.

Diagram IV.4
Single-Family Permits
City of Salem
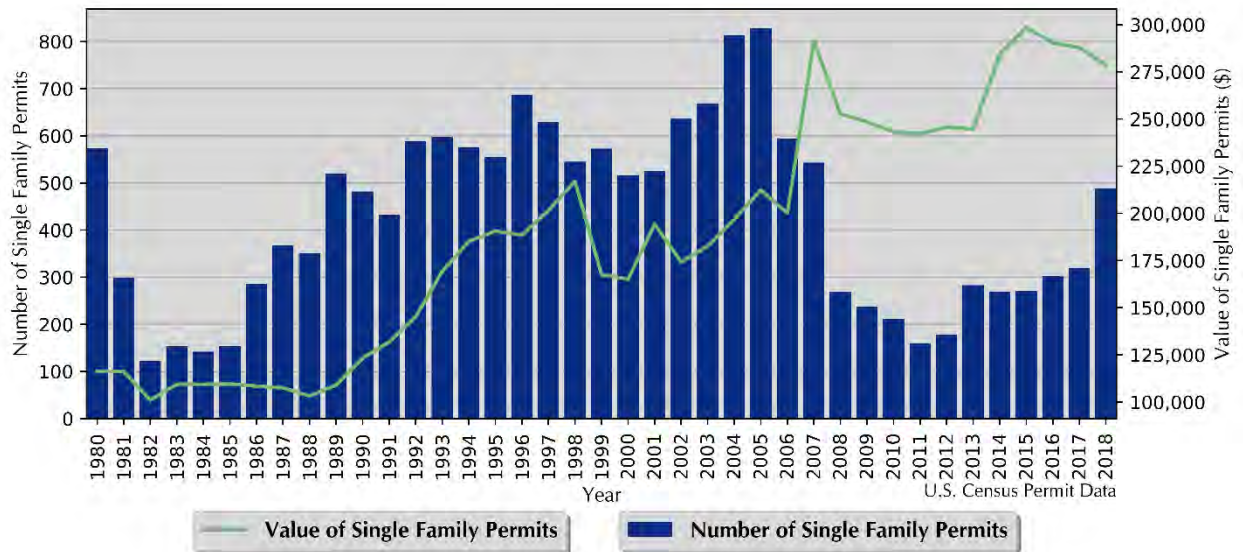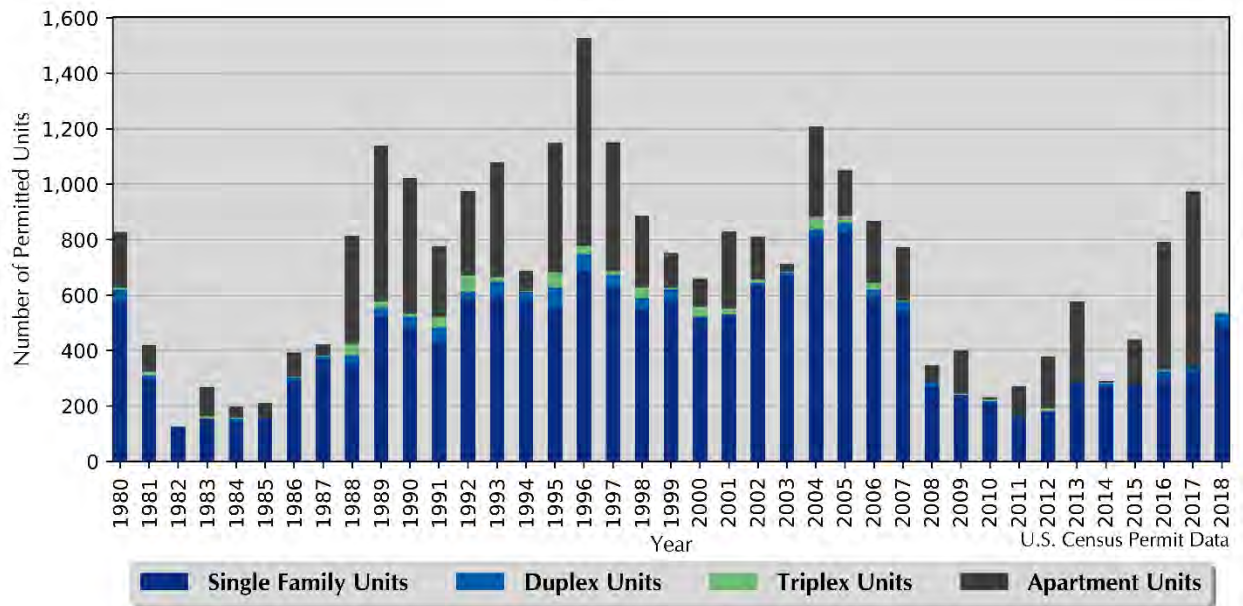Census Bureau Data, 1980–2017

Diagram IV.5
Total Permits by Unit Type
City of Salem
Census Bureau Data, 1980–2017

Households by type and tenure are shown in Table IV.16. Family households represented 64.4 percent of households, while non-family households accounted for 35.6 percent in 2017. These changed from 64.5 percent and 35.5 percent, respectively.

Table IV.16				
Household Type by Tenure				
Salem-Keizer				
2010 Census SF1 & 2017 Five-Year ACS Data				
Household Type	**2010 Census**		**2017 Five-Year ACS**	
	Households	**Households**	**Households**	**% of Total**
Family Households	45,759	64.5%	46,717	64.4%
Married-Couple Family	32,783	71.6%	33,947	72.7%
Owner-Occupied	24,420	74.5%	24,690	72.7%
Renter-Occupied	8,363	25.5%	9,257	27.3%
Other Family	12,976	28.4%	12,770	27.8%
Male Householder, No Spouse Present	3,683	28.4%	3,488	28.8%
Owner-Occupied	1,464	39.8%	1,499	43.0%
Renter-Occupied	2,219	60.2%	1,989	57.0%
Female Householder, No Spouse Present	9,293	71.6%	9,282	72.8%
Owner-Occupied	3,457	37.2%	2,903	31.3%
Renter-Occupied	5,836	62.8%	6,379	68.7%
Non-Family Households	25,234	35.5%	25,873	35.6%
Owner-Occupied	10,926	43.3%	10,634	41.1%
Renter-Occupied	14,308	56.7%	15,239	58.9%
Total	**70,993**	**100.0%**	**72,590**	**100.0%**

Table IV.17, shows housing units by type in 2010 and 2017 for Salem-Keizer. In 2010, there were 74,170 housing units, compared with 77,616 in 2017. Single-family units accounted for 64.3 percent of units in 2017, compared to 65.1 percent in 2010. Apartment units accounted for 20.2 percent in 2017, compared to 20.2 percent in 2010.

Table IV.17				
Housing Units by Type				
Salem-Keizer				
2010 & 2017 Five-Year ACS Data				
Unit Type	**2010 Five-Year ACS**		**2017 Five-Year ACS**	
	Units	**% of Total**	**Units**	**% of Total**
Single-Family	48,321	65.1%	49,892	64.3%
Duplex	2,187	2.9%	2,471	3.2%
Tri- or Four-Plex	4,637	6.3%	5,458	7.0%
Apartment	14,960	20.2%	15,658	20.2%
Mobile Home	4,018	5.4%	4,010	5.2%
Boat, RV, Van, Etc.	47	0.1%	127	0.2%
Total	**74,170**	**100.0%**	**77,616**	**100.0%**

Table IV.18, shows housing units by tenure from 2010 to 2017. By 2017, there were 77,616 housing units. An estimated 54.7 percent were owner-occupied, and 6.5 percent were vacant.

Table IV.18 Housing Units by Tenure Salem-Keizer 2010 Census & 2017 Five-Year ACS Data				
Tenure	**2010 Census**		**2017 Five-Year ACS**	
	Units	**% of Total**	**Units**	**% of Total**
Occupied Housing Units	70,993	93.8%	72,590	93.5%
Owner-Occupied	40,267	56.7%	39,726	54.7%
Renter-Occupied	30,726	43.3%	32,864	45.3%
Vacant Housing Units	4,728	6.2%	5,026	6.5%
Total Housing Units	**75,721**	**100.0%**	**77,616**	**100.0%**

Households by income for the 2010 and 2017 Five-year ACS are shown in Table IV.19. Households earning more than $100,000 per year represented 19.5 percent of households in 2017, compared to 14.9 percent in 2010. Meanwhile, households earning less than $15,000 accounted for 10.7 percent of households in 2017, compared to 12.9 percent in 2000.

Table IV.19 Households by Income Salem-Keizer 2010 & 2017 Five-Year ACS Data				
Income	**2010 Five-Year ACS**		**2017 Five-Year ACS**	
	Households	**% of Total**	**Households**	**% of Total**
Less than $15,000	9,044	12.9%	7,772	10.7%
$15,000 to $19,999	4,003	5.7%	4,047	5.6%
$20,000 to $24,999	4,613	6.6%	3,544	4.9%
$25,000 to $34,999	9,231	13.1%	8,036	11.1%
$35,000 to $49,999	11,077	15.8%	10,584	14.6%
$50,000 to $74,999	13,734	19.6%	14,540	20.0%
$75,000 to $99,999	8,045	11.5%	9,944	13.7%
$100,000 or More	10,460	14.9%	14,123	19.5%
Total	**70,207**	**100.0%**	**72,590**	**100.0%**

Table IV.20, shows households by year home built for the 2010 and 2017 Five-year ACS data. Housing units built between 2000 and 2009, account for 11.5 percent of households in 2010 and 13.0 percent of households in 2017. Housing units built in 1939 or earlier represented 7.2 percent of households in 2017 and 7.2 percent of households in 2010.

Table IV.20 Households by Year Home Built Salem-Keizer 2010 & 2017 Five-Year ACS Data				
Year Built	**2010 Five-Year ACS**		**2017 Five-Year ACS**	
	Households	**% of Total**	**Households**	**% of Total**
1939 or Earlier	5,024	7.2%	5,231	7.2%
1940 to 1949	4,096	5.8%	3,451	4.8%
1950 to 1959	7,642	10.9%	7,158	9.9%
1960 to 1969	7,914	11.3%	7,356	10.1%
1970 to 1979	15,081	21.5%	16,598	22.9%
1980 to 1989	8,423	12.0%	8,386	11.6%
1990 to 1999	13,960	19.9%	13,288	18.3%
2000 to 2009	8,067	11.5%	9,426	13.0%
2010 or Later	.	.	1,696	2.3%
Total	**70,207**	**100.0%**	**72,590**	**100.0%**

The distribution of unit types by race are shown in Table IV.21. An estimated 66.8 percent of white households occupy single-family homes, while 33.4 percent of black households do. Some 18.8 percent of white households occupied apartments, while 33.8 percent of black households do. An estimated 65.2 percent of Asian, and 44.6 percent of American Indian households occupy single-family homes.

Table IV.21 Distribution of Units in Structure by Race Salem-Keizer 2017 Five-Year ACS Data							
Unit Type	**White**	**Black**	**American Indian**	**Asian**	**Native Hawaiian/Pacific Islanders**	**Other**	**Two or More Races**
Single-Family	66.8%	33.4%	44.6%	65.2%	43.9%	56.7%	48.3%
Duplex	3.3%	3.7%	1.0%	5.4%	0%	4.1%	2.7%
Tri- or Four-Plex	5.9%	24.9%	7.0%	3.8%	38.8%	10.6%	13.6%
Apartment	18.8%	33.8%	44.9%	19.1%	17.4%	23.9%	29.4%
Mobile Home	5.0%	4.2%	2.6%	4.7%	0%	4.7%	5.0%
Boat, RV, Van, Etc.	0.1%	0%	0%	1.9%	0%	0%	1.0%
Total	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**

VACANT UNITS

The disposition of vacant units between 2010 and 2017 are shown in Table IV.22. By 2017, for-rent units accounted for 33.2 percent of vacant units, while for-sale units accounted for 16.0 percent. "Other" vacant units accounted for 40.6 percent of vacant units, representing a total of 2,042 "other" vacant units.

Table IV.22 Disposition of Vacant Housing Units Salem-Keizer 2010 Census & 2017 Five-Year ACS Data				
Disposition	**2010 Census**		**2017 Five-Year ACS**	
	Units	**% of Total**	**Units**	**% of Total**
For-Rent	2,195	46.4%	1,668	33.2%
For-Sale	1,150	24.3%	805	16.0%
Rented Not Occupied	90	1.9%	159	3.2%
Sold Not Occupied	133	2.8%	121	2.4%
For Seasonal, Recreational, or Occasional Use	256	5.4%	231	4.6%
For Migrant Workers	2.0	0%	0	0%
Other Vacant	902	19.1%	2,042	40.6%
Total	**4,728**	**100.0%**	**5,026**	**100.0%**

AGE OF STRUCTURE

The age of a structure influences its value. As shown in Table IV.23, structures built in 1939 or earlier had a median value of $173,600, structures built between 1950 and 1959 had a median value of $186,200, and those built between 1990 and 1999 had a median value of $219,500. The newest structures tended to have the highest values and those built between 2010 and 2013 and from 2014 or later had median values of $277,200 and $290,900, respectively. The total median owner-occupied home value in the City of Salem was $201,900.

Table IV.23 Owner-Occupied Median Value by Year Structure Built City of Salem 2017 5-Year ACS Data	
Year Structure Built	**Median Value**
1939 or earlier	$173,600
1940 to 1949	$161,100
1950 to 1959	$186,200
1960 to 1969	$200,700
1970 to 1979	$183,700
1980 to 1989	$211,300
1990 to 1999	$219,500
2000 to 2009	$262,700
2010 to 2013	$277,200
2014 or later	$290,900
Median Value	**$201,900**

In Keizer, structures built in 1939 or earlier had a median value of $199,600 while structures built between 1950 and 1959 had a median value of $169,600 and those built between 1990 and 1999 had a median value of $253,200. The newest structures tended to have the highest values and those built between 2010 and 2013 and from 2014 or later had median values of $254,500 and $364,800 respectively. The total median value in the City of Keizer was $214,400.

Table IV.24 Owner Occupied Median Value by Year Structure Built City of Keizer 2017 5-Year ACS Data	
Year Structure Built	**Median Value**
1939 or earlier	$199,600
1940 to 1949	$188,500
1950 to 1959	$169,600
1960 to 1969	$190,800
1970 to 1979	$190,000
1980 to 1989	$214,800
1990 to 1999	$253,200
2000 to 2009	$244,200
2010 to 2013	$254,500
2014 or later	$364,800
Median Value	**$214,400**

B. Segregation and Integration

This segregation and integration analysis use the dissimilarity index to examine patterns of segregation and integration in order to assist Salem-Keizer with identifying actions to increase fair housing choice.

The "dissimilarity index" provides a quantitative measure of segregation in an area, based on the demographic composition of smaller geographic units within that area.[9] One way of understanding the index is that it indicates how evenly two demographic groups are distributed throughout an area: if the composition of both groups in each geographic unit (e.g., Census tract) is the same as in the area as a whole (e.g., city), then the dissimilarity index score for that city will be 0. By contrast; and again, using Census tracts as an example; if one population is clustered entirely within one Census tract, the dissimilarity index score for the city will be 1. The higher the dissimilarity index value, the higher the level of segregation in an area.

As a general rule, HUD considers the thresholds appearing in the Table below to indicate low, moderate, and high levels of segregation:

Interpreting the dissimilarity index		
Measure	**Values**	**Description**
Dissimilarity Index	<40	Low Segregation
[range 0-100]	40-54	Moderate Segregation
	>55	High Segregation

SEGREGATION LEVELS

Diagram IV.8 shows the dissimilarity index by racial type in 2000, 2010, and 2017. Black and Native Hawaiian households had a moderate level of segregation in 2017. The level of segregation for black households decreased between 2000 and 2010 but grew by 2017. Similarly, the dissimilarity index for Native Hawaiian households increased in 2017 compared to previous years. The population of Native American households increased from representing 0.9 percent of the population in 2010 to 1.3 percent in 2017. Hispanic households have seen an overall decrease in segregation levels since 2000 and remains low.

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[9] Decennial Census, 2010; Brown Longitudinal Tract Database (LTDB) based on decennial census data, 2010, 2000 & 1990. Decennial Census data are Block-group level, and LTDB data are census tract level.

Diagram IV.8
Dissimilarity Index
Salem-Keizer
2000 and 2010 Census, 2017 ACS
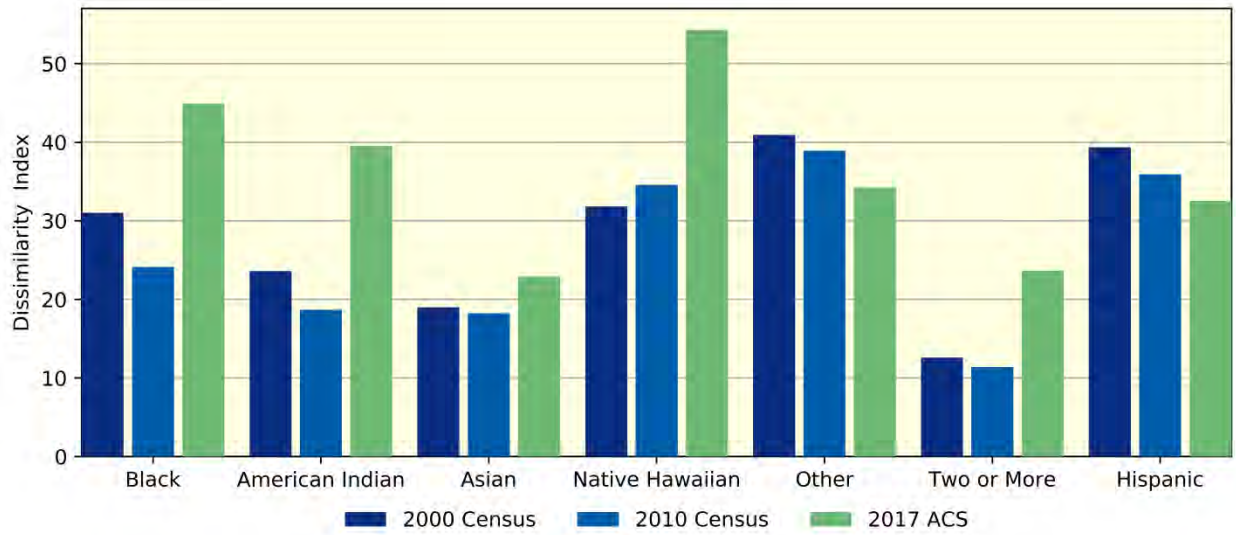
C. Racially or Ethnically Concentrated Areas of Poverty

Racially or ethnically concentrated areas of poverty (R/ECAPs) are Census tracts with relatively high concentrations of non-white residents living in poverty. Formally, an area is designated an R/ECAP if two conditions are satisfied first, the non-white population, whether Hispanic or non-Hispanic, must account for at least 50 percent of the Census tract population.

Salem-Keizer has one (1) R/ECAP in 2017, in the northeastern corner of Salem. This is shown in the map on the following page.

Map IV.1
R/CAPs
Salem-Keizer
HUD AFFH Database, Tigerline
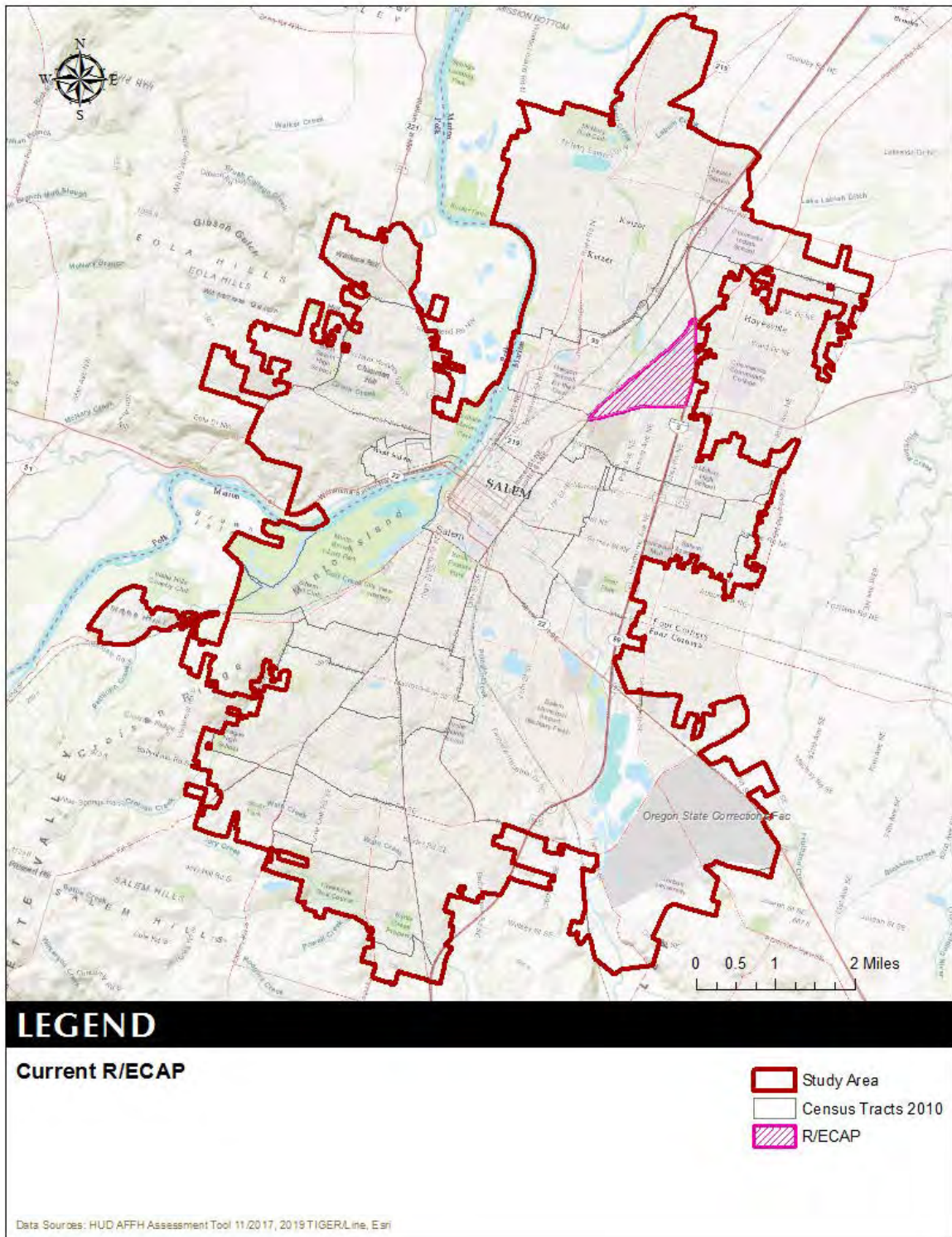
D. Disparities in Access to Opportunity

Areas of opportunity are physical places, areas within communities that provide things one needs to thrive, including quality employment, well performing schools, affordable housing, efficient public transportation, safe streets, essential services, adequate parks, and full-service grocery stores. Areas lacking opportunity, then, have the opposite of these attributes. The disparities in access to opportunity analysis inspects whether a select group, or certain groups, have lower or higher levels of access to these community assets. HUD expresses several of these community assets through the use of an index value, with 100 representing total access by all members of the community, and zero representing no access.

HUD developed the following series of indices to help inform communities about segregation in their jurisdiction and region, as well as about disparities in access to opportunity:

➤ Low Poverty Index – A measure of the degree of poverty in a neighborhood at the Census Tract level.[10]

➤ School Proficiency Index - School-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing schools.[11]

➤ Jobs Proximity - Quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a Core Based Statistical Area (CBSA).[12]

➤ Labor Market Engagement - Provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood.[13]

➤ Low Transportation Cost – Estimates of transportation costs for a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters for the region. [14]

➤ Transit Trips - Trips taken by a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters. [15]

➤ Environmental Health - summarizes potential exposure to harmful toxins at a neighborhood level.[16]

Diagram IV.9 shows the level of Access to Opportunity by race and ethnicity. Black and Hispanic households have a markedly lower rate of access to Low Poverty area, School Proficiency, and Labor market Engagement. There is little variance by race and ethnicity for Transportation Trips,

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[10] American Community Survey (ACS), 2009-2013.
[11] Great Schools, 2012; Common Core of Data (4th grade enrollment and school addresses), 2010; School Attendance Boundary Information System (SABINS), 2012.
[12] Longitudinal Employer-Household Dynamics (LEHD), 2013.
[13] American Community Survey (ACS), 2009-2013.
[14] Location Affordability Index (LAI) data, 2008-2012.
[15] Location Affordability Index (LAI) data, 2008-2012.
[16] National Air Toxics Assessment (NATA) data, 2005.

Transportation Cost, Job Proximity. Hispanic households have a somewhat lower index level for Environmental households than other racial and ethnic groups.

Diagram IV.9
Access to Opportunity
City of Salem
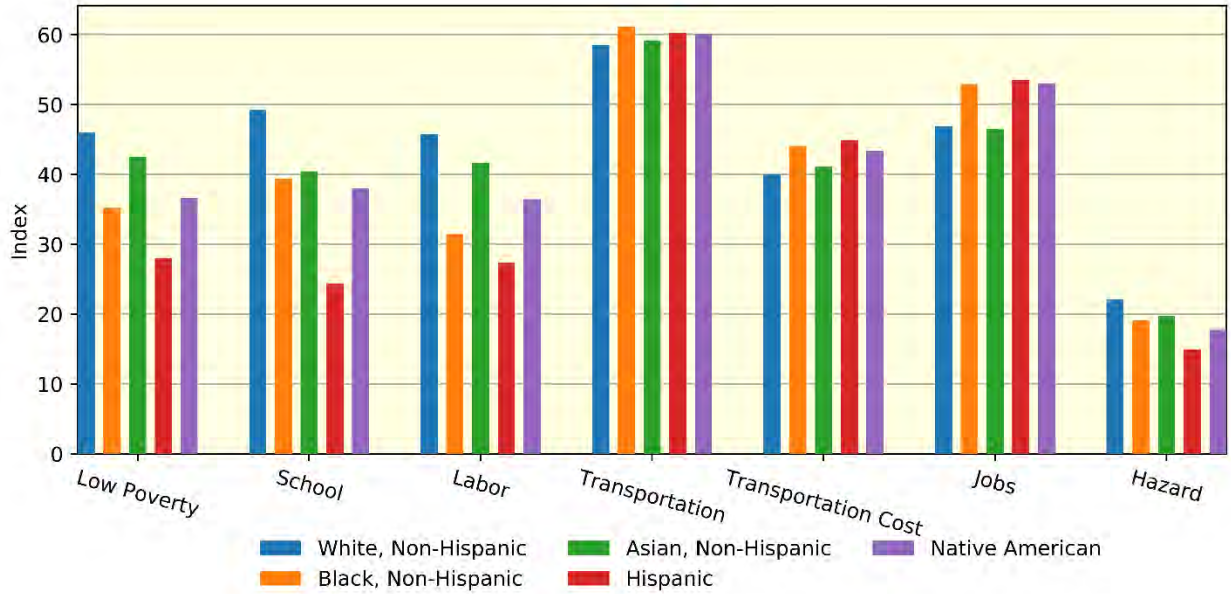
LOW POVERTY

The Low Poverty Index uses rates of family poverty by household (based on the federal poverty line) to measure exposure to poverty by neighborhood. A higher score is more desirable, generally indicating less exposure to poverty at the neighborhood level.

The highest low-poverty index ratings are seen in the outer portions of Salem-Keizer while the lowest scores are in central Salem, in areas that correspond with or are adjacent to the R/ECAP.

Map IV.2
Low Poverty Index
Salem-Keizer
HUD AFFH Assessment Tool 2/28/2018, 2019 TIGER/Line, 2019 Ersi

LEGEND

Low Poverty Index

A higher Low Poverty Index indicates
less exposure to poverty.

Low Poverty Index	Other
1 - 18	Study Area
19 - 32	Census Tracts 2010
33 - 41	R/ECAP
42 - 62	
63 - 83	

Data Sources: HUD AFFH Assessment Tool 11/2017, 2019 TIGER/Line, Esri
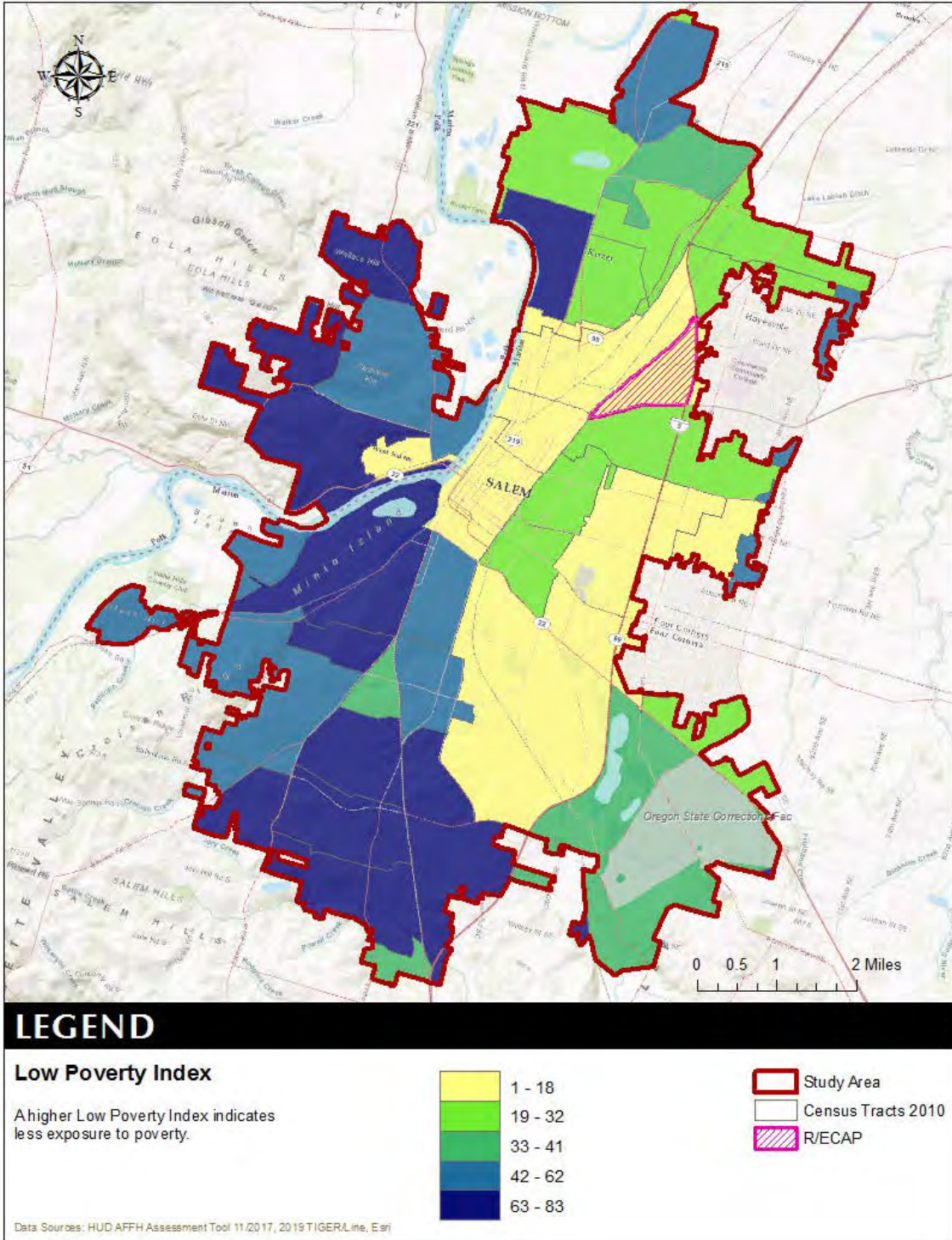
SCHOOL PROFICIENCY

The School Proficiency Index measures the proficiency of elementary schools in the attendance area (where this information is available) of individuals sharing a protected characteristic or the proficiency of elementary schools within 1.5 miles of individuals with a protected characteristic where attendance boundary data are not available. The values for the School Proficiency Index are determined by the performance of 4th grade students on state exams.

School Proficiency indices are highest are seen in the outer portions of Salem-Keizer, while the lowest scores are in central Salem. The highest index ratings are above 80 on a scale of 100, while the lowest are below 16. These are shown in Map IV.3.

Map IV.3
School Proficiency Index
Salem-Keizer
HUD AFFH Assessment Tool 2/28/2018, 2019 TIGER/Line, 2019 Ersi

LEGEND

School Proficiency Index

A higher School Proficiency Index indicates
a higher quality school system.

Note: The School Proficiency Index has been calculated using
the median of each tract's block groups.

Data Sources: HUD AFFH Assessment Tool 11/2017, 2019 TIGER/Line, Esri

	School Proficiency Index
	2 - 16
	17 - 38
	39 - 60
	61 - 79
	80 - 94

Study Area
Census Tracts 2010
R/ECAP
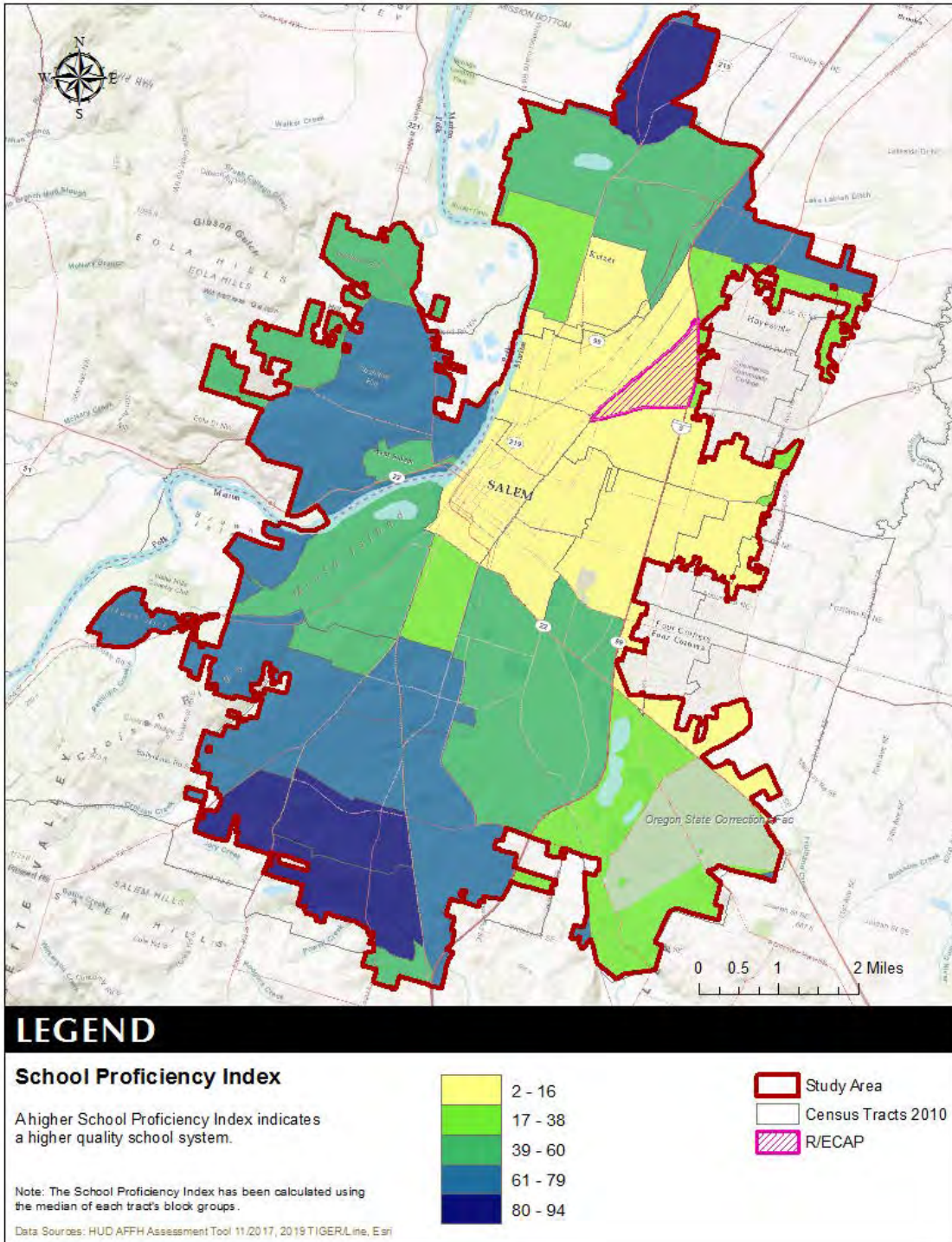
EMPLOYMENT

The Jobs Proximity Index measures the physical distances between place of residence and jobs by race/ethnicity and is shown in Map IV.4. Job proximity varied widely across the cities. As one would expect, the areas closest to city centers had the highest job proximity index ratings.

The Labor Market Engagement Index provides a measure of unemployment rate, labor-force participation rate, and percent of the population ages 25 and above with at least a bachelor's degree, by neighborhood Map IV.5, shows the labor market engagement for the study area. Areas in the southern and southwestern parts of the study area had the highest rate of labor market engagement, above 71 index ratings, while areas in the central part of Salem had the lowest ratings, below 18 index ratings.

Groups with Little Job Access

Geographic location did not seem to correspond with greater access to jobs and labor market engagement on the whole. However, black and Hispanic households tended to have lower access to labor market engagement, which may depend on a variety of factors, including education and unemployment levels.

Map IV.4
Job Proximity Index
Salem-Keizer
HUD AFFH Assessment Tool 2/28/2018, 2019 TIGER/Line, 2019 Ersi

LEGEND

Jobs Proximity Index

A higher Jobs Proximity Index indicates greater access to jobs.

Note: The Jobs Proximity Index has been calculated using the median of each tract's block groups.

Data Sources: HUD AFFH Assessment Tool 11/2017, 2019 TIGER/Line, Esri

	5 - 22
	23 - 41
	42 - 59
	60 - 74
	75 - 98

	Study Area
	Census Tracts 2010
	R/ECAP
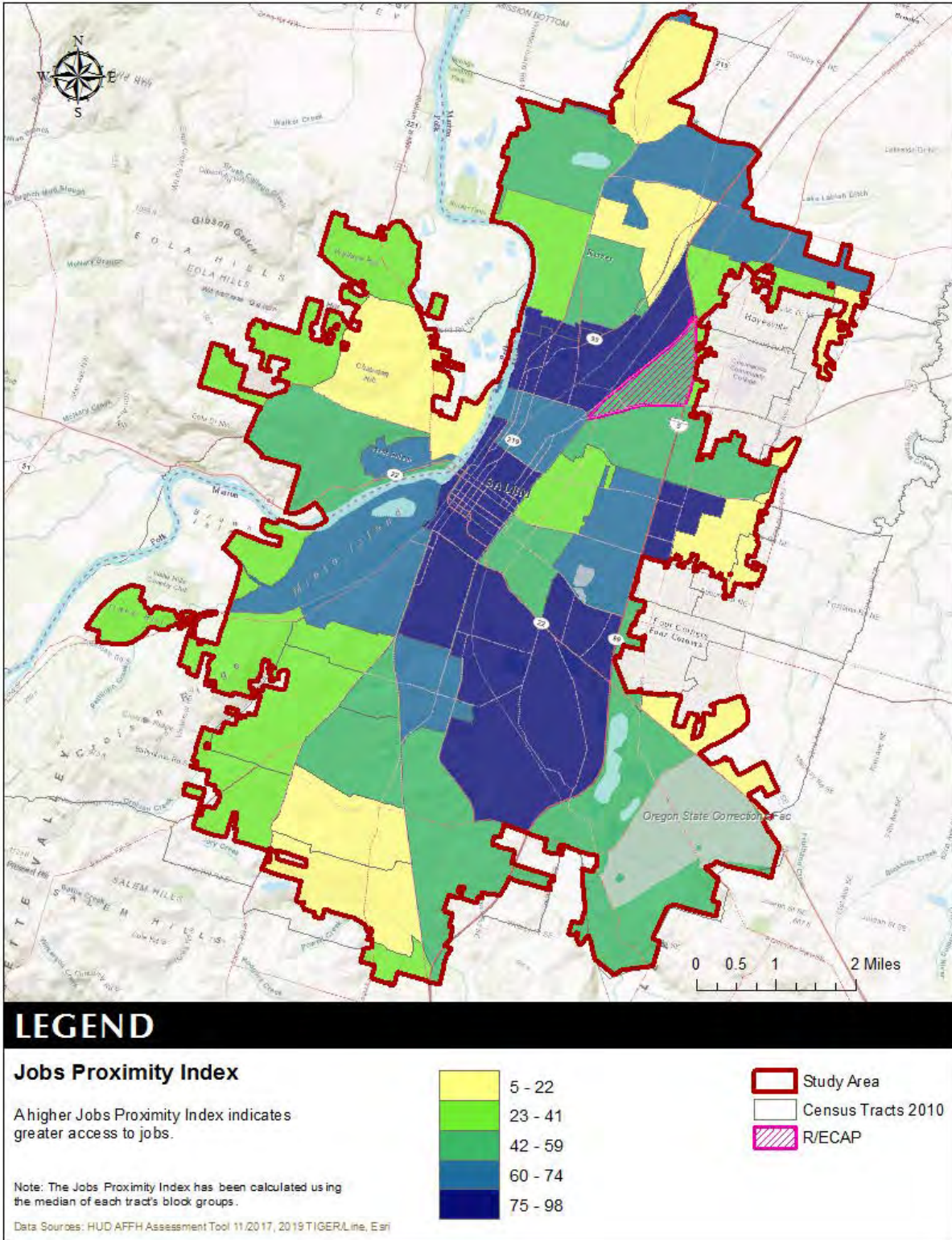
Map IV.5
Labor Market Engagement Index
Salem-Keizer
HUD AFFH Assessment Tool 2/28/2018, 2019 TIGER/Line, 2019 ERSI

LEGEND

Labor Market Engagement Index

A higher Labor Market Engagement Index indicates greater labor market engagement.

☐	1 - 16
☐	17 - 34
☐	35 - 54
☐	55 - 70
☐	71 - 88

Study Area
Census Tracts 2010
R/ECAP

Data Sources: HUD AFFH Assessment Tool 11/2017, 2019 TIGER/Line, Esri
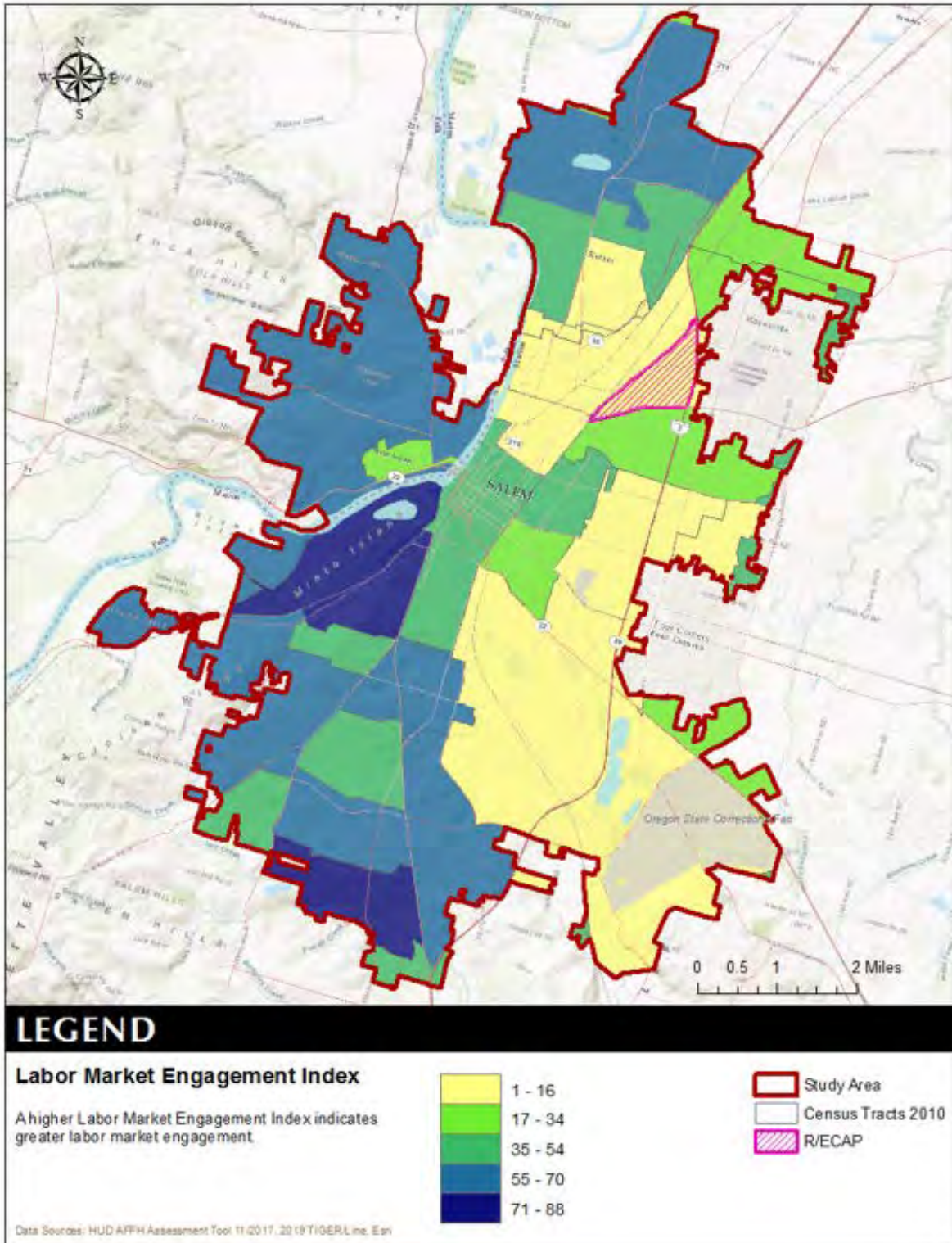
TRANSPORTATION

The Transportation Trip Index measures proximity to public transportation by neighborhood. There was little difference in index rating across racial and ethnic groups. The Transportation Trip Index measures proximity to public transportation by neighborhood. The Transit Trips Index measures how often low-income families in a neighborhood use public transportation. The highest rate of transit trips was in central Salem.

There are no distinct differences for racial and ethnic groups in the County in the number of transit trips.

The Low Transportation Cost Index measures cost of transport and proximity to public transportation by neighborhood. Transportation Costs were lowest in the areas in and adjacent to the Salem city center. The transportation cost indices got lower the farther from the city center. This is shown in Map IV.7.

Groups Lacking Affordable Transit from Home to Work

Overall access to public transportation and cost of transportation in the cities is fairly evenly distributed by racial and ethnic groups. Households living closer to the Salem city center have greater access to transit options.

Map IV.6
Low Transportation Cost Index
Salem-Keizer
HUD AFFH Assessment Tool 2/28/2018, 2019 TIGER/Line, 2019 Ersi

LEGEND

Low Transportation Cost Index

A higher Low Transportation Cost Index indicates lower transportation costs.

	9 - 21
	22 - 35
	36 - 44
	45 - 51
	52 - 60

	Study Area
	Census Tracts 2010
	R/ECAP

Data Sources: HUD AFFH Assessment Tool 11/2017, 2019 TIGER/Line, Esri
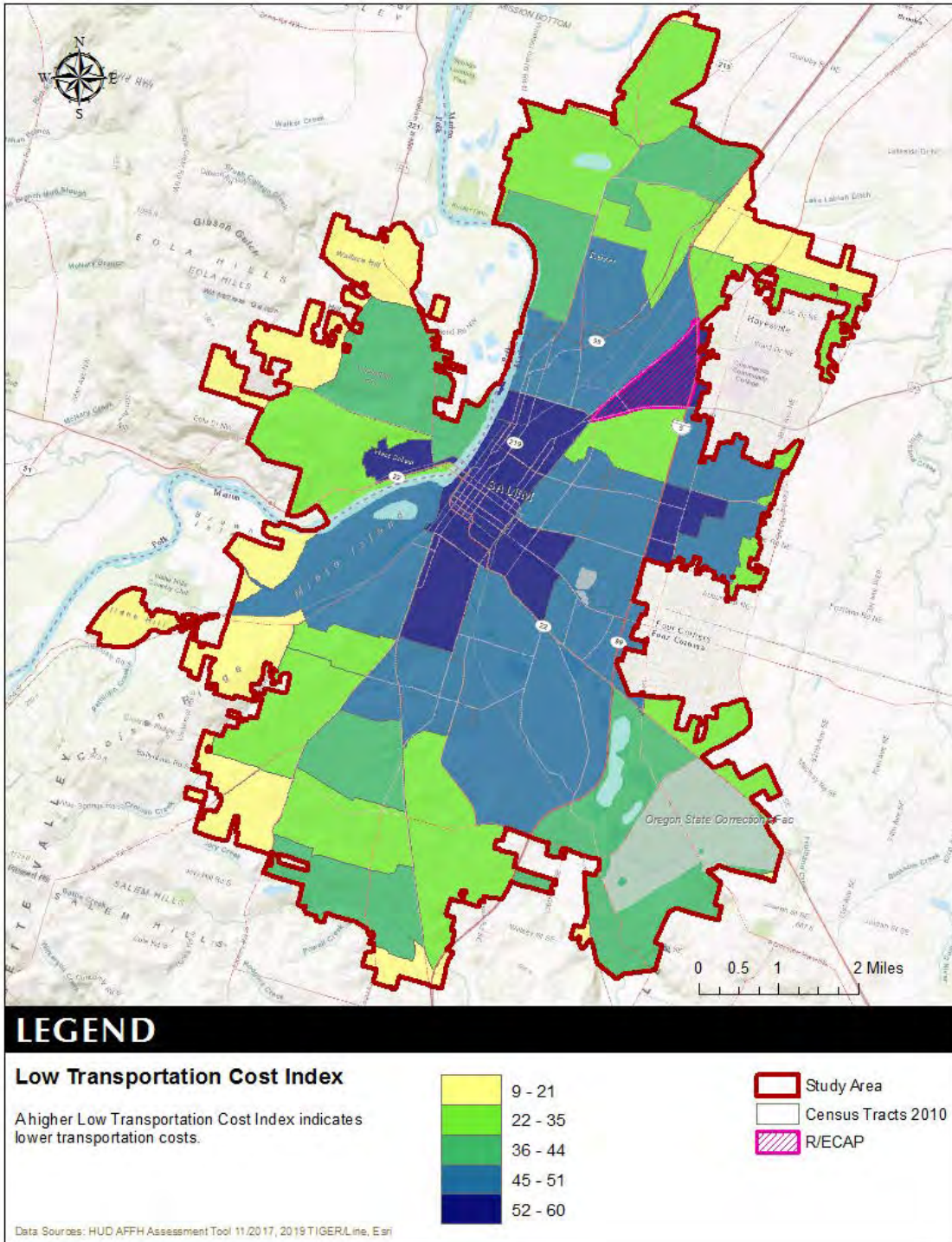
Map IV.7
Transit Trip Index
Salem-Keizer
HUD AFFH Assessment Tool 2/28/2018, 2019 TIGER/Line, 2019 Ersi

LEGEND

Transit Trips Index

A higher Transit Trips Index indicates
a greater likelihood of transit use.

	23 - 35
	36 - 52
	53 - 59
	60 - 64
	65 - 70

Study Area
Census Tracts 2010
R/ECAP

Data Sources: HUD AFFH Assessment Tool 11/2017, 2019 TIGER/Line, Esri
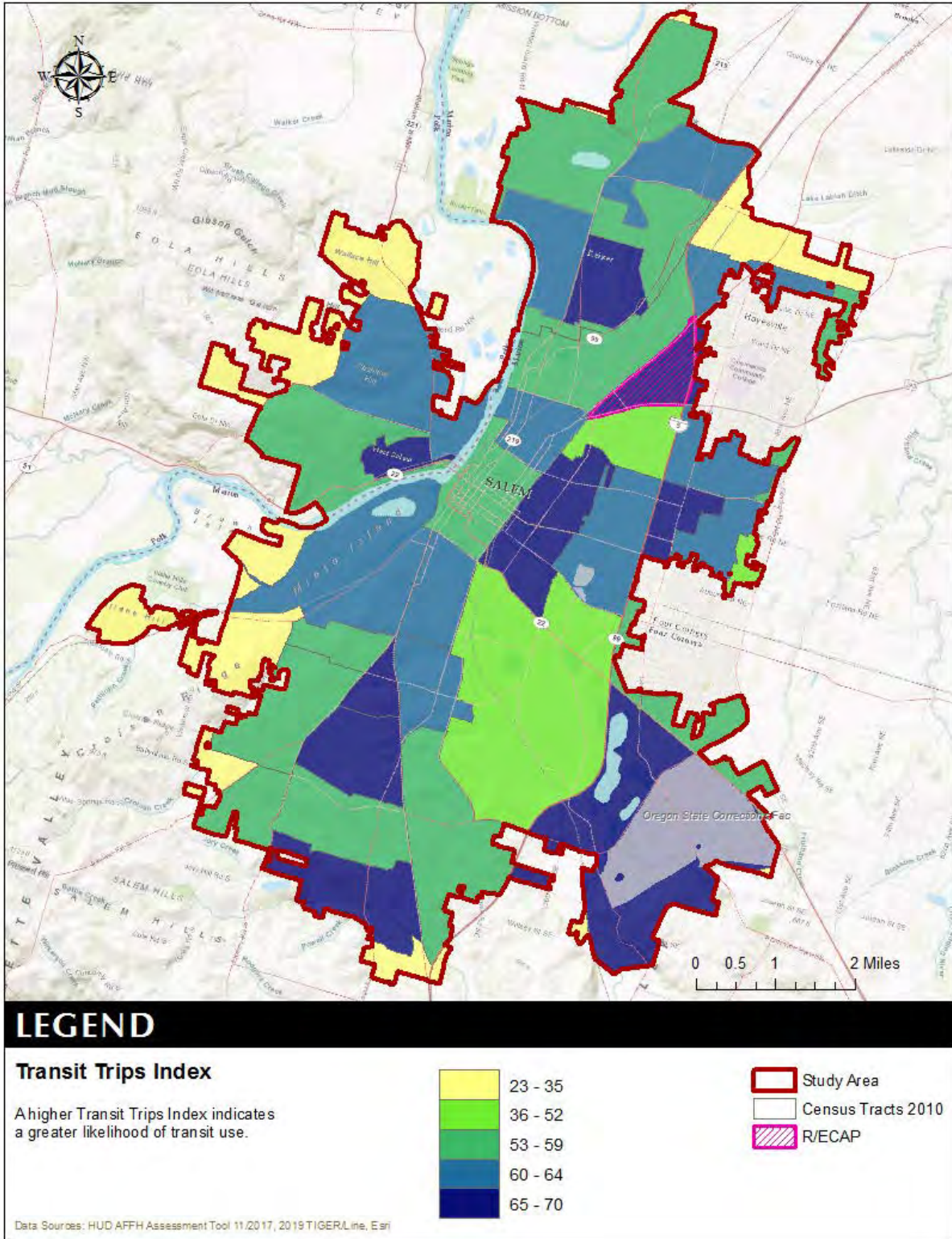
ACCESS TO ENVIRONMENTALLY HEALTHY NEIGHBORHOODS

The Environmental Health Index measures exposure based on EPA estimates of air quality carcinogenic, respiratory and neurological toxins by neighborhood. Large parts of the study area do not have any data, and areas on the outer parts of the cities tended to have higher access to healthy neighborhoods.

Access to Healthy Neighborhoods

The areas in the Salem city center tended to have the lowest Environmental Health index ratings, while areas on the outskirts of the study area had the highest ratings. Overall, this index does not vary substantially by race or ethnicity.

PATTERNS IN DISPARITIES IN ACCESS TO OPPORTUNITY

The degree to which residents had access to low poverty areas, proficient schools, and labor market engagement differed depending on their race or ethnicity, particularly resulting in lower index ratings for black and Hispanic households in the Salem-Keizer area. Other measures of opportunity (use of public transit, transportation costs, and environmental quality) did not differ dramatically by race or ethnicity.

Map IV.8
Environmental Hazard Index
Salem-Keizer
HUD AFFH Assessment Tool 2/28/2018, 2019 TIGER/Line, 2019 Ersi

LEGEND

Environmental Health Index

A higher Environmental Health Index indicates less exposure to toxins harmful to human health.

3 - 8	(yellow)
9 - 17	(light green)
18 - 28	(dark green)
29 - 38	(medium blue)
39 - 77	(dark blue)

Study Area	
Census Tracts 2010	
R/ECAP	
No Data	

Data Sources: HUD AFFH Assessment Tool 11/2017, 2019 TIGER/Line, Esri
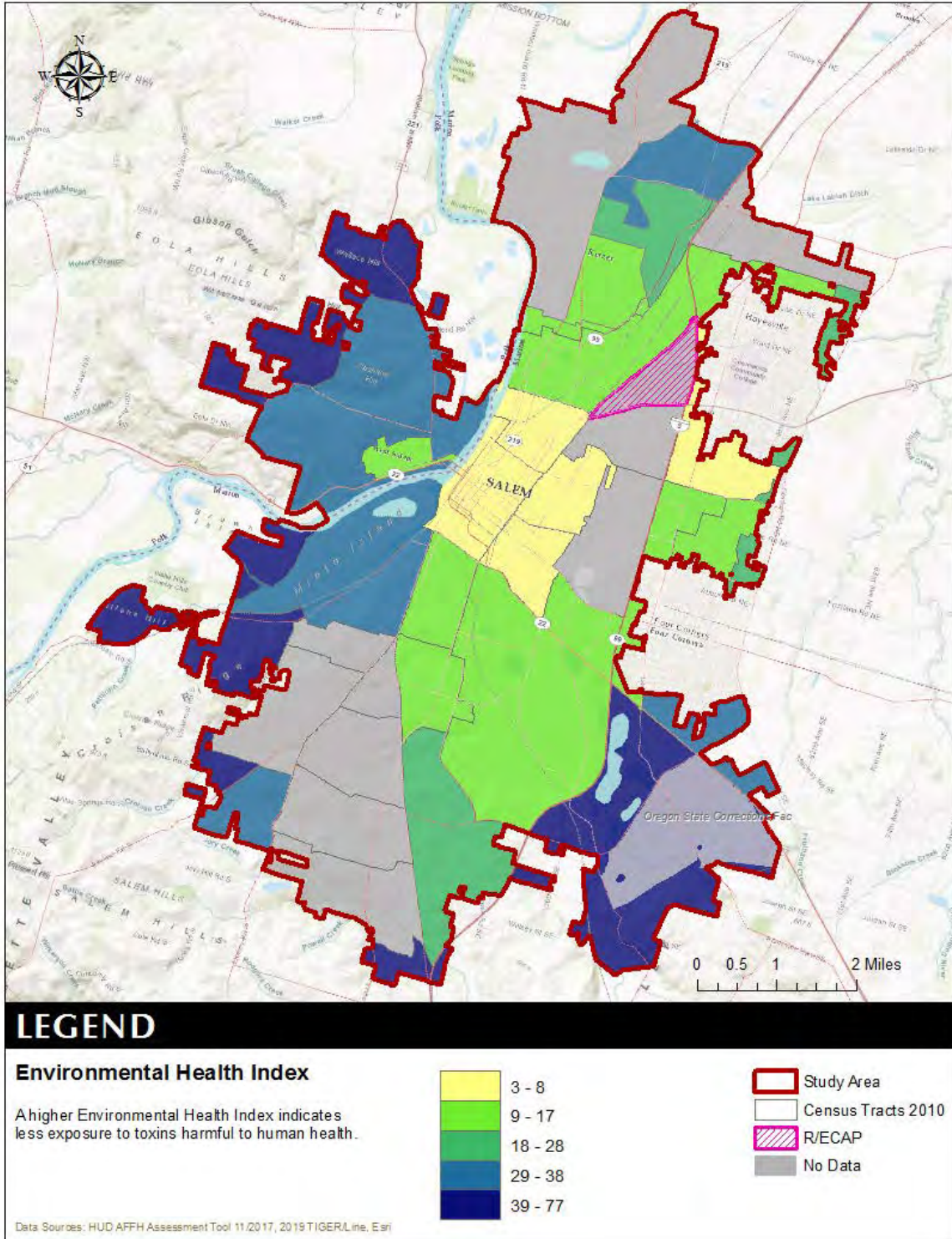
ACCESS TO FINANCIAL SERVICES (HMDA)

Congress enacted the Home Mortgage Disclosure Act in 1975, permanently authorizing the law in 1988[17]. The Act requires both depository and non-depository lenders to collect and publicly disclose information about housing-related applications and loans. Under the HMDA, financial institutions are required to report the race, ethnicity, sex, loan amount, and income of mortgage applicants and borrowers by Census tract. Institutions must meet a set of reporting criteria. For depository institutions, these are as follows:

- The institution must be a bank, credit union, or savings association;
- The total assets must exceed the coverage threshold;[18]
- The institution must have had a home or branch office in a Metropolitan Statistical Area (MSA);
- The institution must have originated or refinanced at least one home purchase loan secured by a first lien on a one- to four-family dwelling;
- The institution must be federally insured or regulated; and
- The mortgage loan must have been insured, guaranteed, or supplemented by a federal agency or intended for sale to Fannie Mae or Freddie Mac.

For other institutions, including non-depository institutions, the reporting criteria are:

- The institution must be a for-profit organization;
- The institution's home purchase loan originations must equal or exceed 10 percent of the institution's total loan originations, or more than $25 million;
- The institution must have had a home or branch office in an MSA or have received applications for, originated, or purchased five or more home purchase loans, home improvement loans, or refinancing on property located in an MSA in the preceding calendar year; and
- The institution must have assets exceeding $10 million or have originated 100 or more home purchases in the preceding calendar year.

In addition to reporting race and ethnicity data for loan applicants, the HMDA reporting requirements were modified in response to the Predatory Lending Consumer Protection Act of 2002 as well as the Home Owner Equity Protection Act (HOEPA). Consequently, loan originations are now flagged in the data system for three additional attributes:

- If they are HOEPA loans;
- Lien status, such as whether secured by a first lien, a subordinate lien, not secured by a lien, or not applicable (purchased loans); and
- Presence of high-annual percentage rate loans (HALs), defined as more than three percentage points for purchases when contrasted with comparable treasury instruments or five percentage points for refinance loans.

For the purposes of this analysis, these flagged originations will be termed predatory, or at least predatory in nature. Overall, the data contained within the HMDA reporting guidelines represent the

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[17] Prior to that year, Congress had to periodically reauthorize the law.
[18] Each December, the Federal Reserve announces the threshold for the following year. The asset threshold may change from year to year based on changes in the Consumer Price Index for Urban Wage Earners and Clerical Workers.

best and most complete set of information on home loan applications. This report includes HMDA data from 2008 through 2017, the most recent year for which these data are available.

Table IV.25, shows the purpose of loan by year for Salem-Keizer from 2008 to 2017. There were there were over 95,207 loans during this time period, of these some 33,351 were for home purchases. In 2017, there were 9,484 loans, of which 4,697 were for home purchases.

Table IV.25 Purpose of Loan by Year Salem-Keizer 2008–2017 HMDA Data											
Purpose	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
Home Purchase	3,582	3,252	2,562	2,141	2,409	2,802	2,950	4,187	4,769	4,697	33,351
Home Improvement	829	385	253	217	228	290	309	411	566	781	4,269
Refinancing	6,926	9,059	7,141	5,409	7,138	5,835	2,746	3,991	5,336	4,006	57,587
Total	11,337	12,696	9,956	7,767	9,775	8,927	6,005	8,589	10,671	9,484	95,207

Table IV.26, shows the occupancy status for loan applicants. A vast majority of applicants were or owner-occupied units, accounting for 90.1 percent between 2008 and 2017, and for 91.6 percent in 2017 alone.

Table IV.26 • Occupancy Status for Applications Salem-Keizer 2008–2017 HMDA Data											
Status	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
Owner-Occupied	10,434	12,049	9,126	6,897	8,733	7,747	5,327	7,785	9,816	8,688	86,602
Not Owner-Occupied	898	641	820	869	1,038	1,145	677	802	846	789	8,525
Not Applicable	5	6	10	1	4	35	1	2	9	7	80
Total	11,337	12,696	9,956	7,767	9,775	8,927	6,005	8,589	10,671	9,484	95,207

Owner-occupied home purchase loan applications by loan types are shown in Table IV.27. Between 2008 and 2017, some 48.7 percent of home loan purchases were conventional loans, 40.2 percent were FHA insured, and 10.8 percent were VA Guaranteed.

Table IV.27 • Owner-Occupied Home Purchase Loan Applications by Loan Type Salem-Keizer 2008–2017 HMDA Data											
Loan Type	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
Conventional	1,893	1,251	804	714	848	1,230	1,489	1,832	2,330	2,524	14,915
FHA - Insured	1,123	1,538	1,323	964	1,038	1,005	878	1,541	1,560	1,335	12,305
VA - Guaranteed	195	256	207	229	256	308	373	487	517	492	3,320
Rural Housing Service or Farm Service Agency	4	12	5	2	11	11	7	4	5	1	62
Total	3,215	3,057	2,339	1,909	2,153	2,554	2,747	3,864	4,412	4,412	30,602

Denial Rates

After the owner-occupied home purchase loan application is submitted, the applicant receives one of the following status designations:

- "Originated," which indicates that the loan was made by the lending institution;
- "Approved but not accepted," which notes loans approved by the lender but not accepted by the applicant;
- "Application denied by financial institution," which defines a situation wherein the loan application failed;
- "Application withdrawn by applicant," which means that the applicant closed the application process;
- "File closed for incompleteness" which indicates the loan application process was closed by the institution due to incomplete information; or
- "Loan purchased by the institution," which means that the previously originated loan was purchased on the secondary market.

As shown in Table IV.28, just over 16,956 home purchase loan applications were originated over the 2008-2017 period, and 2,302 were denied.

Table IV.28										
• **Loan Applications by Action Taken**										
Salem-Keizer										
2008–2017 HMDA Data										
Action	**2008**	**2009**	**2010**	**2011**	**2012**	**2013**	**2014**	**2015**	**2016**	**2017**	**Total**
Loan Originated	1,508	1,415	1,162	971	1,105	1,428	1,677	2,328	2,615	2,750	16,959
Application Approved but not Accepted	185	158	131	83	65	79	77	102	90	107	1,077
Application Denied	376	232	194	149	164	224	191	211	300	261	2,302
Application Withdrawn by Applicant	173	175	103	76	106	163	201	366	532	458	2,353
File Closed for Incompleteness	43	39	58	25	74	28	20	29	41	41	398
Loan Purchased by the Institution	924	1,034	690	605	639	631	581	828	834	735	7,501
Preapproval Request Denied	3	3	0	0	0	0	0	0	0	0	6
Preapproval Approved but not Accepted	3	1	1	0	0	1	0	0	0	0	6
Total	**3,215**	**3,057**	**2,339**	**1,909**	**2,153**	**2,554**	**2,747**	**3,864**	**4,412**	**4,352**	**30,602**

The most common reasons cited in the decision to deny one of these loan applications related to the debt-to-income ratio of the prospective homeowner, as shown in Table IV.29. Credit history and collateral were also commonly given as reasons to deny home purchase loans.

Table IV.29 — Loan Applications by Reason for Denial — Salem-Keizer — 2008–2017 HMDA Data											
Denial Reason	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
Debt-to-Income Ratio	60	51	64	42	44	38	27	46	53	45	470
Employment History	9	7	7	2	8	3	7	8	3	9	63
Credit History	51	38	44	33	24	28	26	28	41	28	341
Collateral	22	27	27	20	25	20	26	16	36	21	240
Insufficient Cash	13	9	7	7	4	7	3	11	10	13	84
Unverifiable Information	21	5	4	3	2	15	7	6	15	9	87
Credit Application Incomplete	18	14	10	6	15	19	16	16	38	19	171
Mortgage Insurance Denied	4	1	1	0	0	1	0	1	0	0	8
Other	37	52	12	13	15	17	10	10	11	9	186
Missing	141	28	18	23	27	76	69	69	93	108	652
Total	**376**	**232**	**194**	**149**	**164**	**224**	**191**	**211**	**300**	**261**	**2302**

Denial rates were observed to differ by race and ethnicity, as shown in Table IV.30. While white applicants had a denial rate of 11.5 percent over the period from 2008 through 2017, American Indian applicants had a denial rate of 21.6 percent. As for ethnicity, Hispanic applicants had a higher denial rate than non-Hispanic applicants, at 17.6 percent versus 11.1 percent. The rate of denial for Hispanic applicants has decreased significantly since 2008.

Table IV.30 — Denial Rates by Race/Ethnicity of Applicant — Salem-Keizer — 2004–2017 HMDA Data											
Race/Ethnicity	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Average
American Indian	44.8%	41.2%	46.7%	20%	8.3%	22.2%	15.8%	6.5%	17.4%	10.3%	21.6%
Asian	18.6%	21.6%	7%	24%	3.6%	18.3%	15.4%	14.3%	21.4%	12%	15.5%
Black	18.8%	38.5%	0%	20%	0%	7.1%	18.2%	5.9%	4.3%	5%	10.1%
Pacific Islander	33.3%	10%	14.3%	23.1%	0%	22.2%	30%	18.8%	20%	10.7%	18.8%
White	19.1%	13.2%	13.7%	12.8%	13.2%	13.1%	9.4%	8.1%	9.2%	8.5%	11.5%
Not Available	27%	17.6%	22.4%	13.8%	14%	15.8%	16.4%	9.4%	17.6%	9.5%	15.1%
Not Applicable	0%	%	%	%	%	0%	%	0%	16.7%	0%	6.7%
Average	**20%**	**14.1%**	**14.3%**	**13.3%**	**12.9%**	**13.6%**	**10.2%**	**8.3%**	**10.3%**	**8.7%**	**12%**
Hispanic	34.4%	19.3%	16.8%	14.6%	24.4%	15.6%	17.2%	13.9%	13.4%	12.1%	17.6%
Non-Hispanic	17.6%	13.3%	13.5%	13.4%	11.4%	13%	9.1%	7.5%	9.3%	8.3%	11.1%

Predatory Lending

In addition to modifications implemented in 2004 to correctly document loan applicants' race and ethnicity, the HMDA reporting requirements were changed in response to the Predatory Lending Consumer Protection Act of 2002 as well as the Home Owner Equity Protection Act (HOEPA). Consequently, loan originations are now flagged in the data system for three additional attributes:

- If they are HOEPA loans;
- Lien status, such as whether secured by a first lien, a subordinate lien, not secured by a lien, or not applicable (purchased loans); and
- Presence of high annual percentage rate (APR) loans (HALs), defined as more than three percentage points higher than comparable treasury rates for home purchase loans, or five percentage points higher for refinance loans.

Home loans are designated as "high-annual percentage rate" loans (HALs) where the annual percentage rate on the loan exceeds that of a comparable treasury instruments by at least three percentage points. As shown in Table IV.31, only 95 loans between 2008 and 2017 were HALs, accounting for 0.6 percent. The highest rate of HAL loans was seen in 2008, at 4.2 percent, which fell to 0.2 percent in 2017.

Table IV.31										
• Originated Owner-Occupied Loans by HAL Status										
Salem-Keizer										
2008–2017 HMDA Data										
Loan Type	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
HAL	64	13	1	2	1	1	3	2	3	5	95
Other	1444	1402	1161	969	1104	1427	1674	2326	2612	2745	16864
Total	1,508	1,415	1,162	971	1,105	1,428	1,677	2,328	2,615	2,750	16,959
Percent HAL	4.2%	0.9%	0.1%	0.2%	0.1%	0.1%	0.2%	0.1%	0.1%	0.2%	0.6%

Maps IV.9 and IV.10, on the following pages, show the total loans for 2008-2011 and 2012-2017. More loans were given in the western and outer edges of the Cities than in the city center.

Mortgage denials area shown in Maps IV.11 and IV.12. In both sets of years, 2008-2011 and 2012-2017, denials were highest in central Salem.

Maps IV.13 and IV.14 show HAL rates in both year groups. While HAL rates dropped significantly, they still tended to be more likely in central Salem.

Map IV.9
Total Loans 2008-2011
Salem-Keizer
HMDA, 2019 TIGER/Line, 2019 Ersi
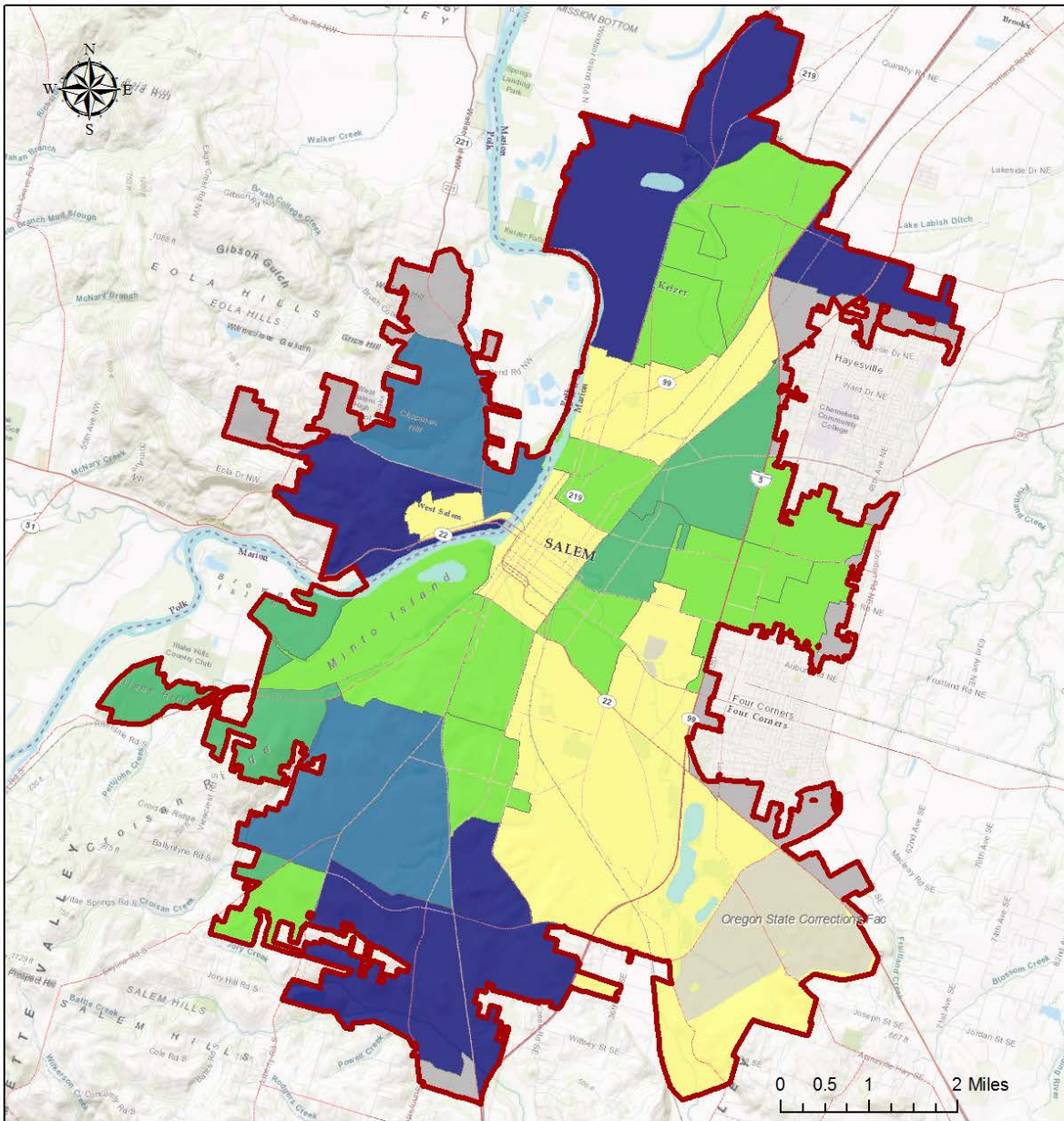
LEGEND

2008-2011 HMDA Total Loans

The excluded Census tracts have less than 50% of their population residing in the study area.

15 - 68	
69 - 159	
160 - 212	
213 - 326	
327 - 625	

Study Area	
Census Tracts 2000	
Excluded Tracts	

Data Sources: 2008-2011 FFEIC, 2019 TIGER/Line, 2019 Esri

Map IV.10
Total Loans 2012-2017
Salem-Keizer
HMDA, 2019 TIGER/Line, 2019 Ersi
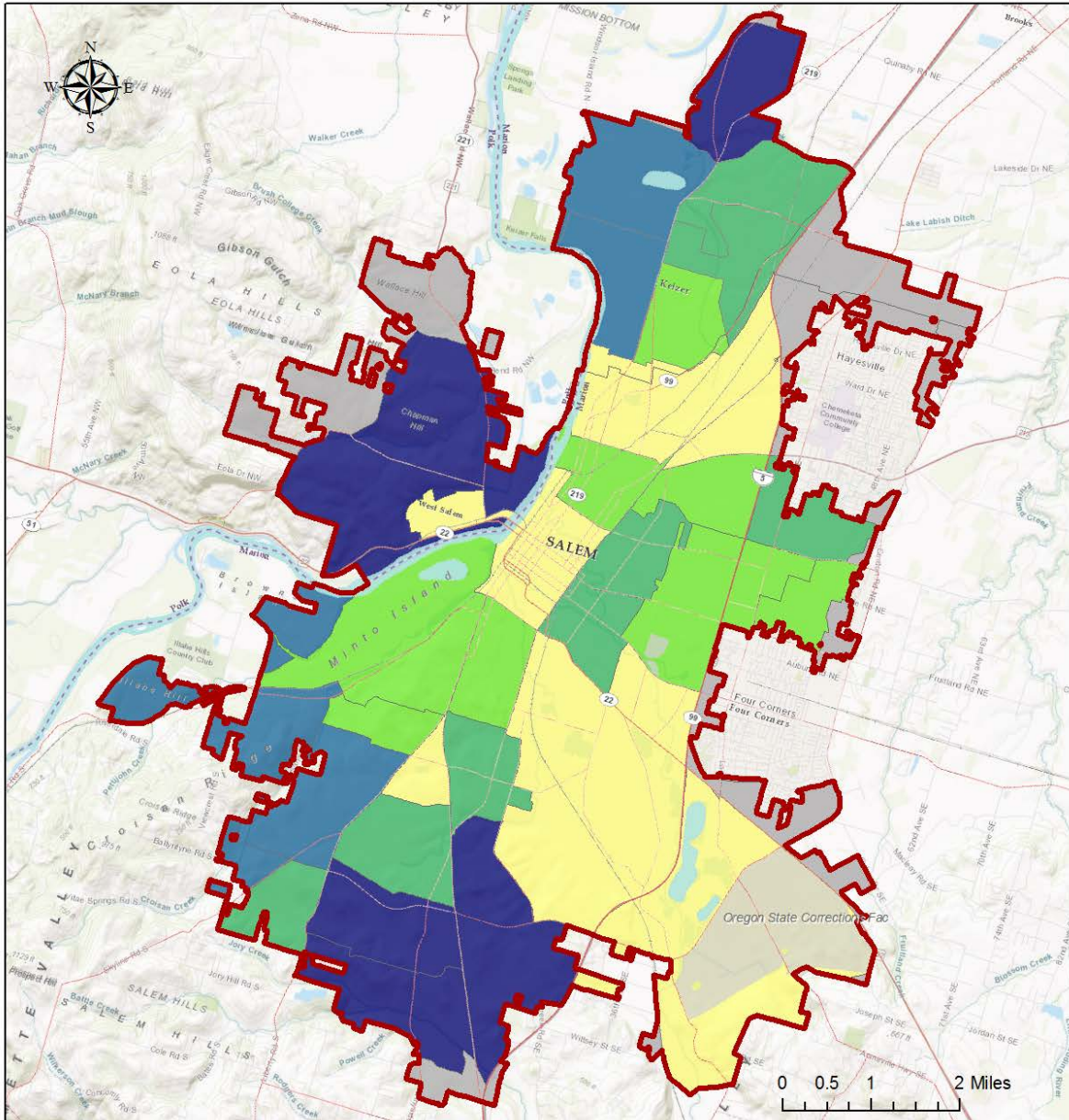
LEGEND

2012-2017 HMDA Total Loans

The excluded Census tracts have less than 50% of their population residing in the study area.

	122 - 198
	199 - 360
	361 - 530
	531 - 743
	744 - 1273

	Study Area
	Census Tracts 2010
	Excluded Tracts

Data Sources: 2012-2017 FFEIC, 2019 TIGER/Line, 2019 Esri

Map IV.11
Mortgage Denials 2008-2011
Salem-Keizer
HMDA, 2019 TIGER/Line, 2019 Ersi
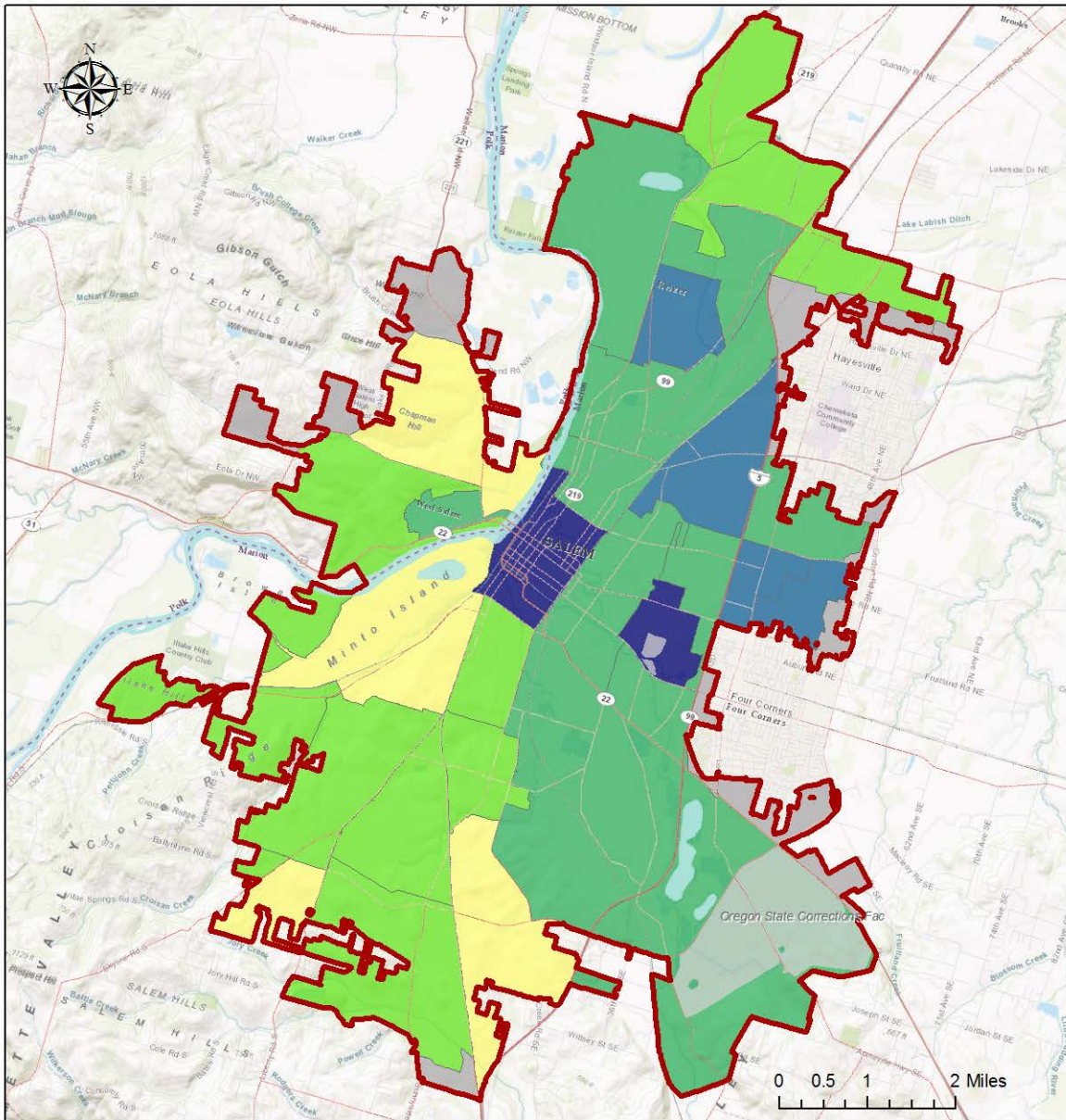
LEGEND

2008-2011 HMDA Denial Rate

The excluded Census tracts have less than 50% of their population residing in the study area.

9.7% - 12.0%	
12.1% - 15.3%	
15.4% - 20.3%	
20.4% - 28.5%	
28.6% - 46.7%	

Study Area
Census Tracts 2000
Excluded Tracts
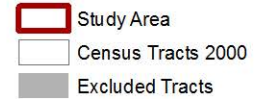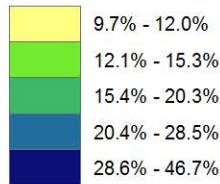
Data Sources: 2008-2011 FFEIC, 2019 TIGER/Line, 2019 Esri

Map IV.12
Mortgage Denials 2012-2017
Salem-Keizer
HMDA, 2019 TIGER/Line, 2019 Ersi

LEGEND

2012-2017 HMDA Denial Rate

The excluded Census tracts have less than 50% of their population residing in the study area.

	5.8% - 7.3%
	7.4% - 9.6%
	9.7% - 11.8%
	11.9% - 16.0%
	16.1% - 20.0%

Study Area
Census Tracts 2010
Excluded Tracts

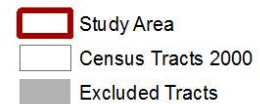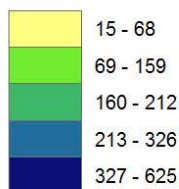Data Sources: 2012-2017 FFEIC, 2019 TIGER/Line, 2019 Esri
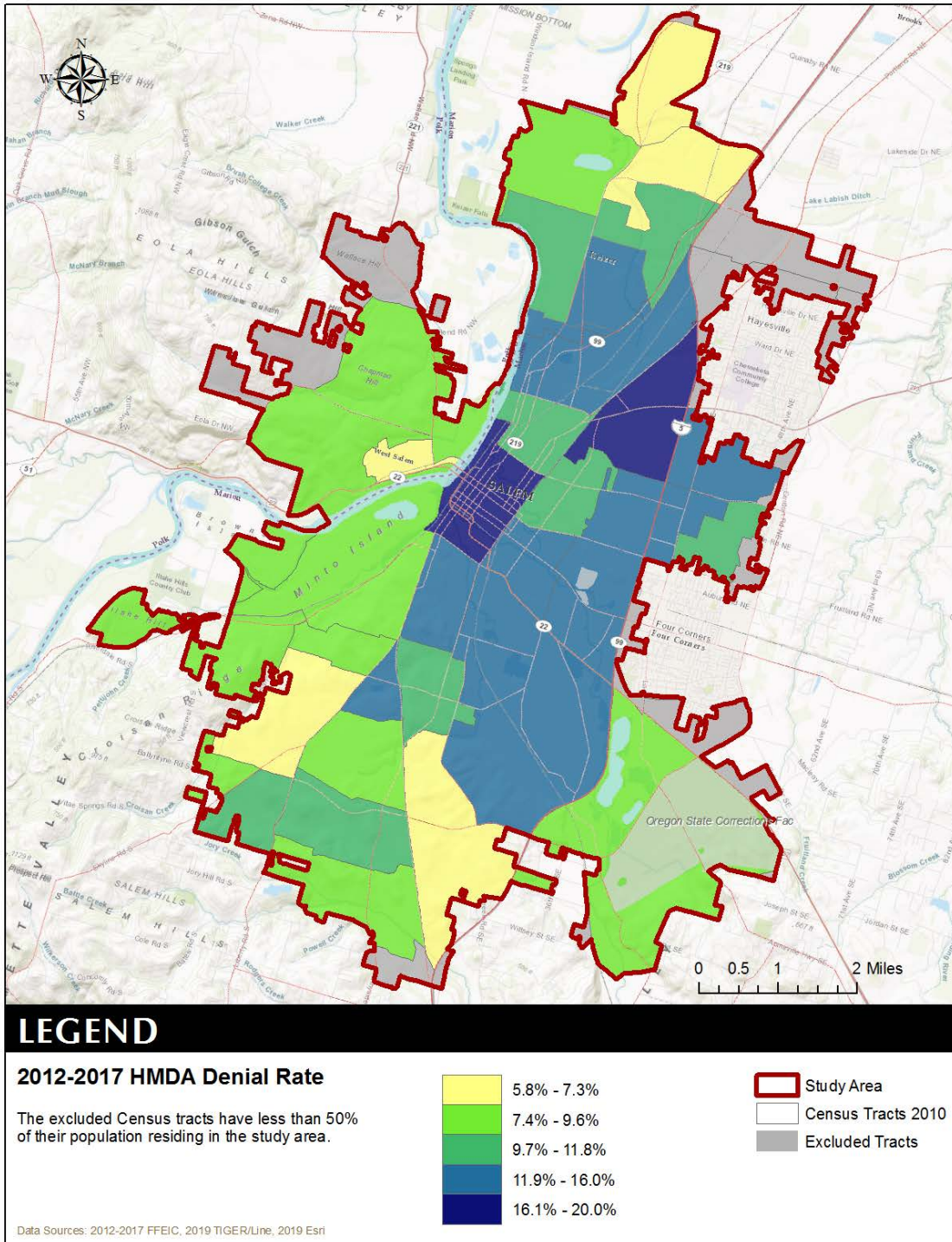
Map IV.13
HAL Rates 2008-2011
Salem-Keizer
HMDA, 2019 TIGER/Line, 2019 Ersi

LEGEND

2008-2011 HMDA HAL Rate

The excluded Census tracts have less than 50% of their population residing in the study area.

	0.0% - 0.3%
	0.4% - 1.4%
	1.5% - 2.4%
	2.5% - 3.6%
	3.7% - 5.4%

	Study Area
	Census Tracts 2000
	Excluded Tracts

Data Sources: 2008-2011 FFEIC, 2019 TIGER/Line, 2019 Esri

Map IV.14
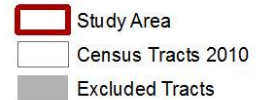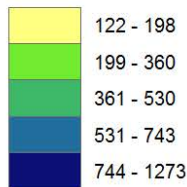**HAL Rates 2012-2017**
Salem-Keizer
HMDA, 2019 TIGER/Line, 2019 Ersi

LEGEND

2012-2017 HMDA HAL Rate

The excluded Census tracts have less than 50% of their population residing in the study area.
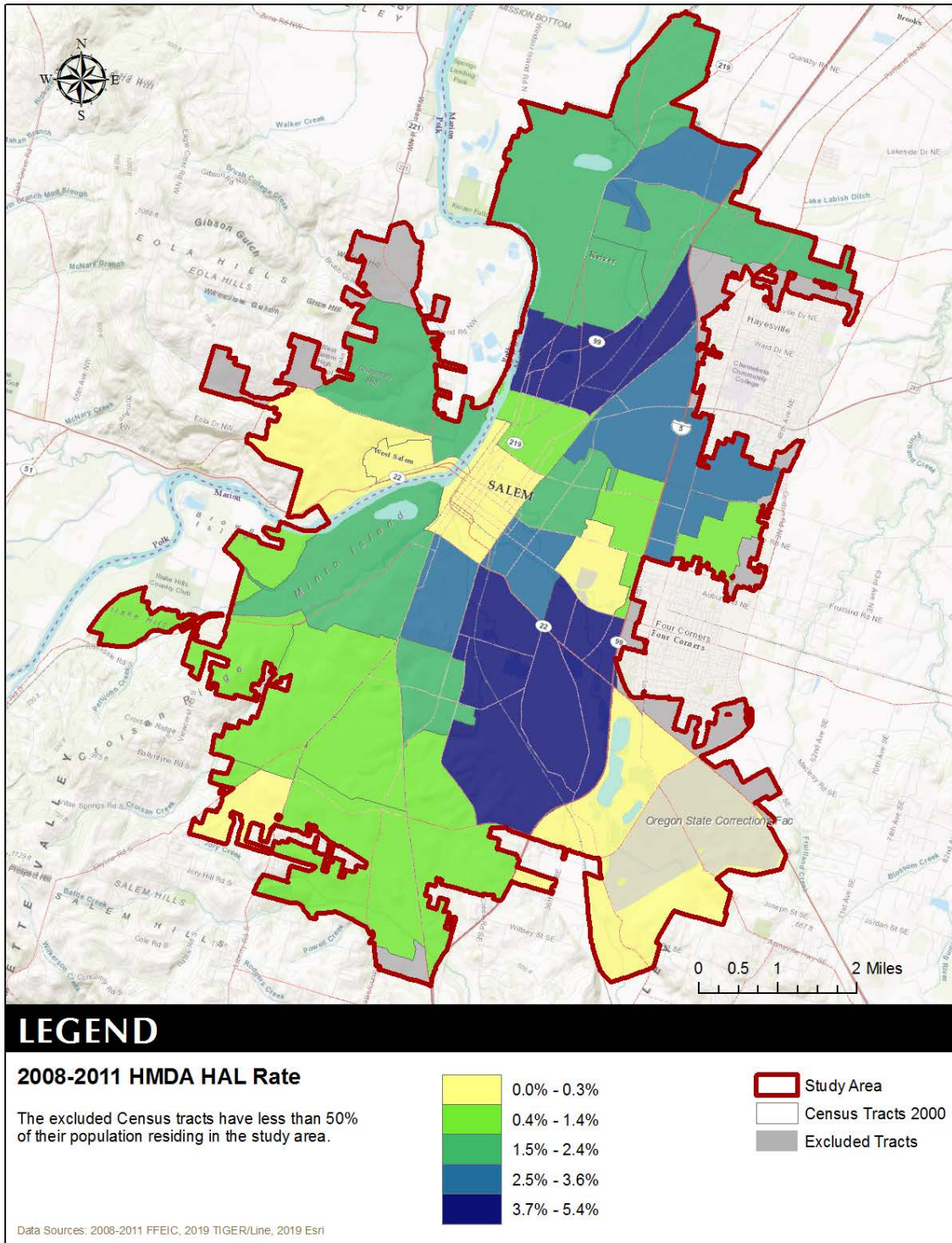
	0.0%
	0.1%
	0.2%
	0.3% - 0.4%
	0.5% - 0.9%

	Study Area
	Census Tracts 2010
	Excluded Tracts

Data Sources: 2012-2017 FFEIC, 2019 TIGER/Line, 2019 Esri
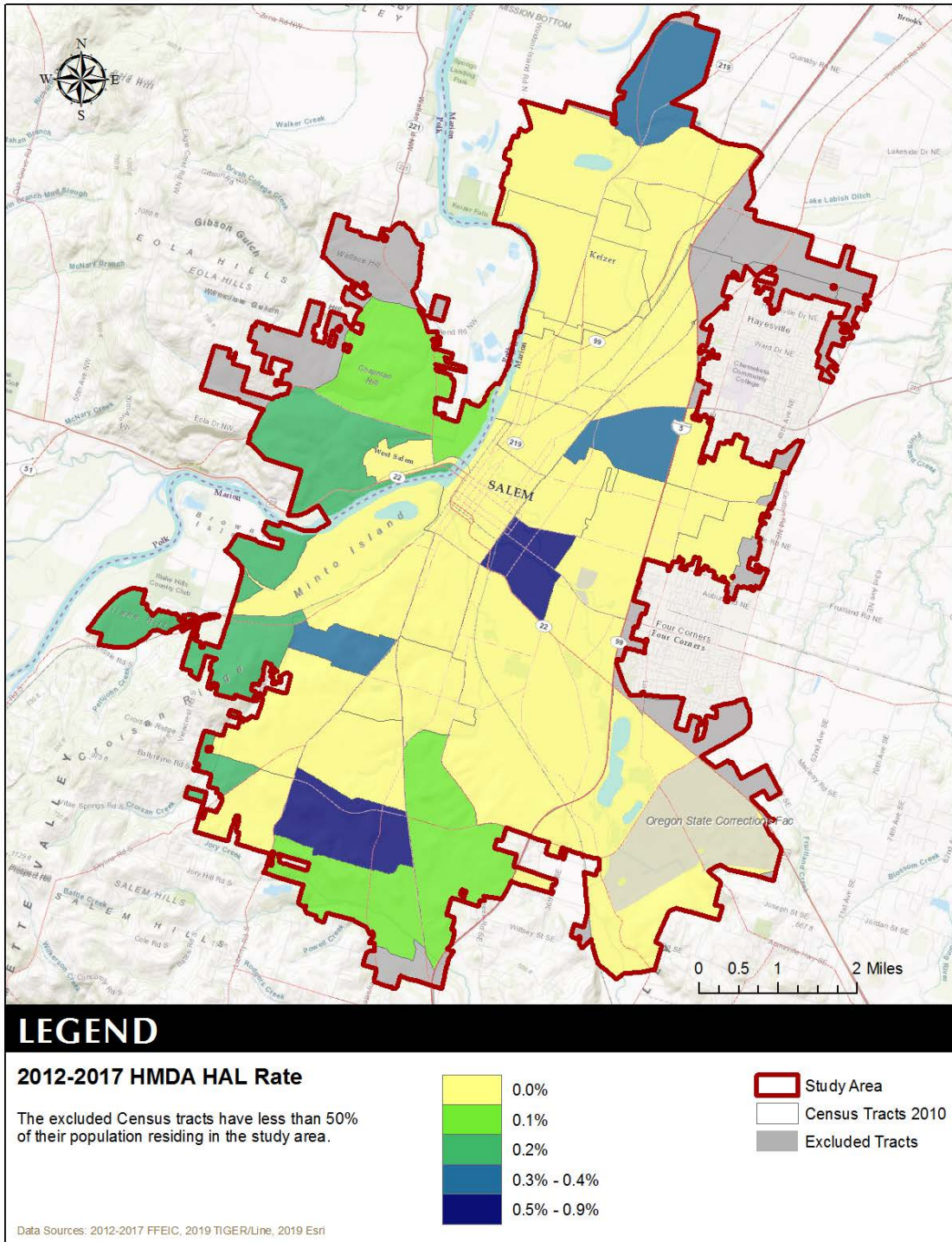
E. DISPROPORTIONATE HOUSING NEEDS

Each year, HUD receives custom tabulations of American Community Survey (ACS) data to demonstrate the extent of housing problems and housing needs, particularly for low-income households. This data, known as the "CHAS" data (Comprehensive Housing Affordability Strategy), are used by local governments to plan how to spend HUD funds. Information on housing problems is drawn from CHAS data produced via custom tabulations of ACS data by the U.S. Census Bureau to determine the extent of the housing problems and housing needs, particularly for low-income households. [19]

HOUSING PROBLEMS

Households are classified as having housing problems if they face overcrowding, incomplete plumbing or kitchen facilities, or cost burdens. Overcrowding is defined as having from 1.1 to 1.5 people per room per residence, with severe overcrowding defined as having more than 1.5 people per room. Households with overcrowding are shown in Table IV.32. In 2017, an estimated 3.1 percent of households were overcrowded, and an additional 0.8 percent were severely overcrowded.

	Table IV.32 Overcrowding and Severe Overcrowding Salem-Keizer 2010 & 2017 Five-Year ACS Data						
Data Source	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
Owner							
2010 Five-Year ACS	40,042	97.8%	656	1.6%	234	0.6%	40,932
2017 Five-Year ACS	38,991	98.1%	563	1.4%	172	0.4%	39,726
Renter							
2010 Five-Year ACS	27,508	94.0%	1,370	4.7%	397	1.4%	29,275
2017 Five-Year ACS	30,755	93.6%	1,688	5.1%	421	1.3%	32,864
Total							
2010 Five-Year ACS	67,550	96.2%	2,026	2.9%	631	0.9%	70,207
2017 Five-Year ACS	69,746	96.1%	2,251	3.1%	593	0.8%	72,590

Incomplete plumbing and kitchen facilities are another indicator of potential housing problems. According to the Census Bureau, a housing unit is classified as lacking complete plumbing facilities when any of the following are not present: piped hot and cold water, a flush toilet, and a bathtub or shower. Likewise, a unit is categorized as deficient when any of the following are missing from the kitchen: a sink with piped hot and cold water, a range or cook top and oven, and a refrigerator.

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[19] Comprehensive Housing Affordability Strategy (CHAS), 2009-2013.

There were a total of 232 households with incomplete plumbing facilities in 2017, representing 0.3 percent of households in Salem-Keizer. This is compared to 0.3 percent of households lacking complete plumbing facilities in 2010.

Table IV.33 Households with Incomplete Plumbing Facilities Salem-Keizer 2010 and 2017 Five-Year ACS Data		
Households	2010 Five-Year ACS	2017 Five-Year ACS
With Complete Plumbing Facilities	69,990	72,358
Lacking Complete Plumbing Facilities	217	232
Total Households	70,207	72,590
Percent Lacking	0.3%	0.3%

There were 1,277 households lacking complete kitchen facilities in 2017, compared to 894 households in 2010. This was a change from 1.3 percent of households in 2010 to 1.8 percent in 2017.

Table IV.34 Households with Incomplete Kitchen Facilities Salem-Keizer 2010 and 2017 Five-Year ACS Data		
Households	2010 Five-Year ACS	2017 Five-Year ACS
With Complete Kitchen Facilities	69,313	71,313
Lacking Complete Kitchen Facilities	894	1,277
Total Households	70,207	72,590
Percent Lacking	1.3%	1.8%

Cost burden is defined as gross housing costs that range from 30 to 50 percent of gross household income; severe cost burden is defined as gross housing costs that exceed 50 percent of gross household income. For homeowners, gross housing costs include property taxes, insurance, energy payments, water and sewer service, and refuse collection. If the homeowner has a mortgage, the determination also includes principal and interest payments on the mortgage loan. For renters, this figure represents monthly rent and selected electricity and natural gas energy charges.

In Salem-Keizer, 20.6 percent of households had a cost burden and 14.8 percent had a severe cost burden. Some 26.3 percent of renters were cost burdened, and 22.9 percent were severely cost burdened. Owner-occupied households without a mortgage had a cost burden rate of 8.6 percent and a severe cost burden rate of 5.8 percent. Owner occupied households with a mortgage had a cost burden rate of 19.3 percent, and severe cost burden at 9.1 percent.

	Table IV.35 Cost Burden and Severe Cost Burden by Tenure Salem-Keizer 2010 & 2017 Five-Year ACS Data								
	Less Than 30%		**31%-50%**		**Above 50%**		**Not Computed**		
Year	**Households**	**% of Total**	**Households**	**% of Total**	**Households**	**% of Total**	**Households**	**% of Total**	**Total**
	Owner With a Mortgage								
2010	18,161	60.1%	8,335	27.6%	3,649	12.1%	62	0.2%	30,207
2017	19,490	71.2%	5,274	19.3%	2,502	9.1%	109	0.4%	27,375
	Owner Without a Mortgage								
2010	8,892	82.9%	1,209	11.3%	557	5.2%	67	0.6%	10,725
2017	10,472	84.8%	1,057	8.6%	713	5.8%	109	0.9%	12,351
	Renter								
2010	13,955	47.7%	7,229	24.7%	7,234	24.7%	857	2.9%	29,275
2017	15,536	47.3%	8,645	26.3%	7,525	22.9%	1,158	3.5%	32,864
	Total								
2010	41,008	58.4%	16,773	23.9%	11,440	16.3%	986	1.4%	70,207
2017	45,498	62.7%	14,976	20.6%	10,740	14.8%	1,376	1.9%	72,590

HOUSING PROBLEMS BY INCOME AND RACE

The following tables can be used to determine if there is a disproportionate housing need for any racial or ethnic groups. If any racial/ethnic group faces housing problems at a rate of ten percentage points or high than the jurisdiction average, then they have a disproportionate share of housing problems. Housing problems are defined as any household that has overcrowding, inadequate kitchen or plumbing facilities, or are cost burdened (pay more than 30 percent of their income on housing).

Overall, there are 22,542 households with housing problems in Salem-Keizer. This includes 289 black households, 555 Asian households, 208 American Indian, 220 Pacific Islander, and 895 "other" race households with housing problems. As for ethnicity, there are 4,290 Hispanic households with housing problems. This is shown in Table IV.36.

In the City of Salem, the average rate of housing problems is 38.7 percent. There are various racial and ethnic groups that face a disproportionate share of housing problems, or at a rate at least ten percentage points higher than the jurisdiction average. American Indian households face housing problems at a rate of 63.6 percent, Pacific Islander households face housing problems at a rate of 61.1 percent, "other" race households at a rate of 55.1 percent, and Hispanic households at a rate of 52.6 percent.

Table IV.36 Total Households with Housing Problems by Income and Race Salem city 2011–2015 HUD CHAS Data								
Income	**Non-Hispanic by Race**						**Hispanic (Any Race)**	**Total**
	White	**Black**	**Asian**	**American Indian**	**Pacific Islander**	**Other Race**		
With Housing Problems								
$0 to $20,820	3,790	100	200	24	55	265	1,040	5,474
$20,821 to $34,700	3,635	65	130	90	100	330	1,395	5,745
$34,701 to $55,520	4,470	105	130	60	10	160	1,315	6,250
$55,521 to $69,400	1,600	19	70	20	10	100	245	2,064
Above $69,400	2,590	0	25	14	45	40	295	3,009
Total	16,085	289	555	208	220	895	4,290	22,542
Total								
$0 to $20,820	4,780	175	225	24	115	345	1,175	6,839
$20,821 to $34,700	4,385	65	140	90	100	330	1,580	6,690
$34,701 to $55,520	7,680	105	220	74	55	235	2,185	10,554
$55,521 to $69,400	4,555	59	235	55	10	129	760	5,803
Above $69,400	24,275	205	640	84	80	585	2,445	28,314
Total	**45,675**	**609**	**1,460**	**327**	**360**	**1,624**	**8,145**	**58,200**

Overall, there are 4,684 households with housing problems in the City of Keizer. This includes 35 black households, 10 Asian households, 25 American Indian, 4 Pacific Islander, and 235 "other" race households with housing problems. As for ethnicity, there are 870 Hispanic households with housing problems. This is shown in Table IV.37.

In the City of Keizer, the average rate of housing problems is 33.9 percent. The racial and ethnic groups that face a disproportionate share of housing problems include American Indian households at 48.1 percent, "other" race households at 51.3 percent, and Hispanic households at 48.5 percent. However, American Indian households account for only 52 households in Keizer and may not be statistically significant.

Table IV.37

Total Households with Housing Problems by Income and Race
Keizer city
2011–2015 HUD CHAS Data

Income	Non-Hispanic by Race						Hispanic (Any Race)	Total
	White	Black	Asian	American Indian	Pacific Islander	Other Race		
With Housing Problems								
$0 to $20,820	690	25	10	0	0	110	240	1,075
$20,821 to $34,700	870	0	0	25	4	20	255	1,174
$34,701 to $55,520	995	10	0	0	0	55	260	1,320
$55,521 to $69,400	320	0	0	0	0	15	30	365
Above $69,400	630	0	0	0	0	35	85	750
Total	3,505	35	10	25	4	235	870	4,684
Total								
$0 to $20,820	745	25	10	0	0	114	244	1,138
$20,821 to $34,700	1,120	0	0	25	4	24	263	1,436
$34,701 to $55,520	1,810	10	0	8	0	150	330	2,308
$55,521 to $69,400	895	0	29	0	70	25	155	1,174
Above $69,400	6,525	84	115	19	55	145	800	7,743
Total	**11,095**	**119**	**154**	**52**	**129**	**458**	**1,792**	**13,799**

F. Publicly Supported Housing

There are a variety of types and locations of public housing units within Salem-Keizer. According to HUD's AFFH data, there are 1,192 total units in Salem and Keizer. Of these, some 505 are public housing units, 620 are project-based Section 8, and another 67 are other HUD multifamily units.

Table IV.38 Residents with Disabilities by Subsidized Housing Type Salem-Keizer city HUD AFFH Raw Database		
Program	Total Units	Total Disabled Units
Public Housing	505	167
Project Based Section 8	620	164
Other HUD Multifamily	67	0
Housing Choice Vouchers	0	0
Total	**1192**	**331**

Map IV.15 shows the public housing units in Salem-Keizer and Map IV.16 shows housing choice vouchers.

Low Income Housing Tax Credit (LIHTC) units are shown in Map IV.17 and Map IV.18 shows other assisted multi-family housing units in Salem-Keizer.

Disparities in Access to Opportunity

The locations of publicly supported housing units are in areas with both high and low access to opportunity. While publicly supported housing units tended to be located in areas with higher access to transportation and job proximity, they also tended to be located in areas with lower school proficiency and with lower access to low poverty areas.

Map IV.15
Public Housing Units
Salem-Keizer
2017 ACS, 2017 Tigerline, HUD AFFH Tool

LEGEND

Public Housing Units

- 1
- 2 - 3
- 4
- 5 - 6
- 7 - 16

Study Area
Census Tracts 2010
R/ECAP

Data Sources: HUD AFFH Assessment Tool 11/2017, 2019 TIGER/Line, Esri
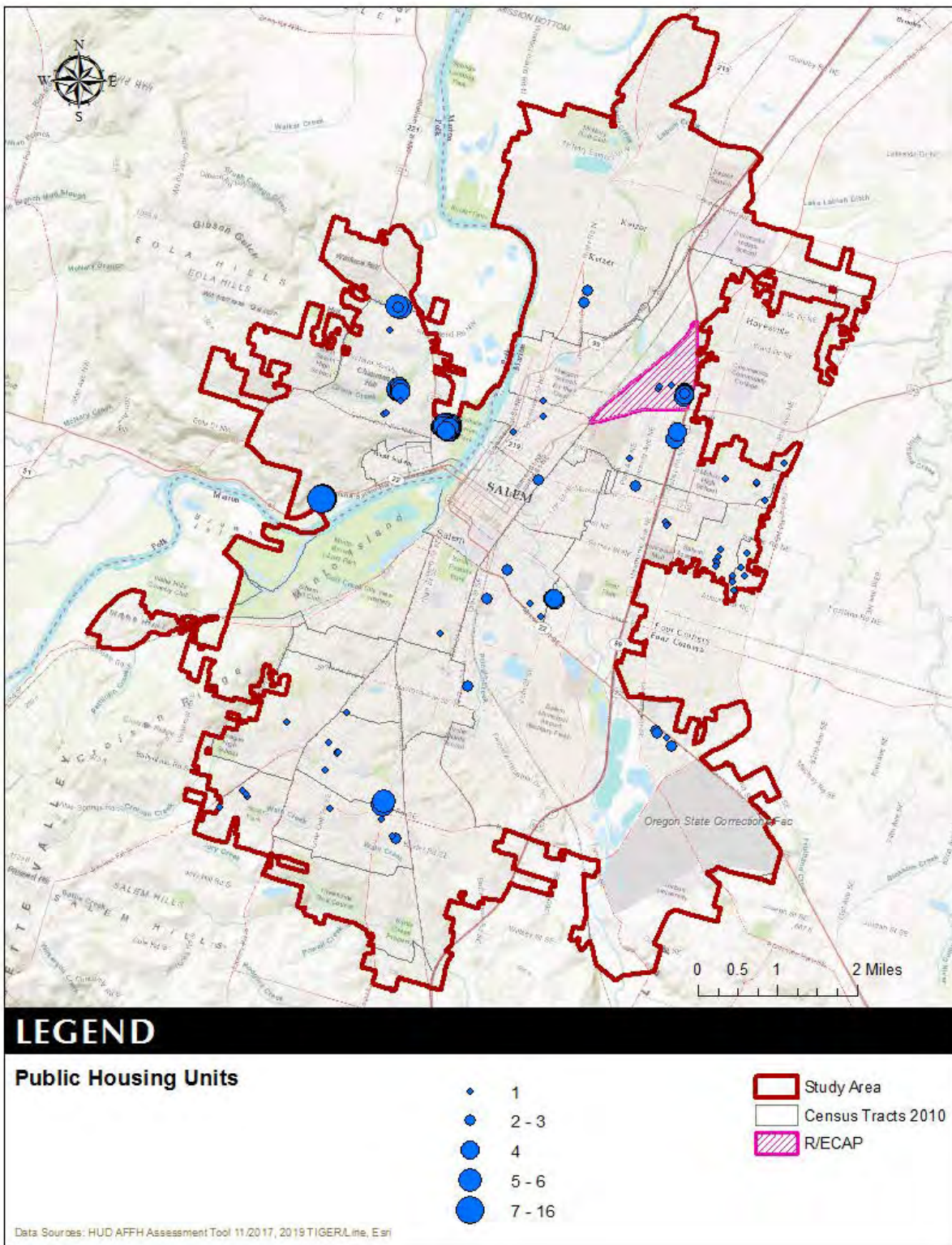
Map IV.16
Housing Choice Voucher Units
Salem-Keizer
2017 ACS, 2017 Tigerline, HUD AFFH Tool

LEGEND

Housing Choice Voucher Units

·	11 - 27
•	28 - 57
●	58 - 95
●	96 - 135
●	136 - 232

Study Area
Census Tracts 2010
R/ECAP

Data Sources: HUD AFFH Assessment Tool 11/2017, 2019 TIGER/Line, Esri
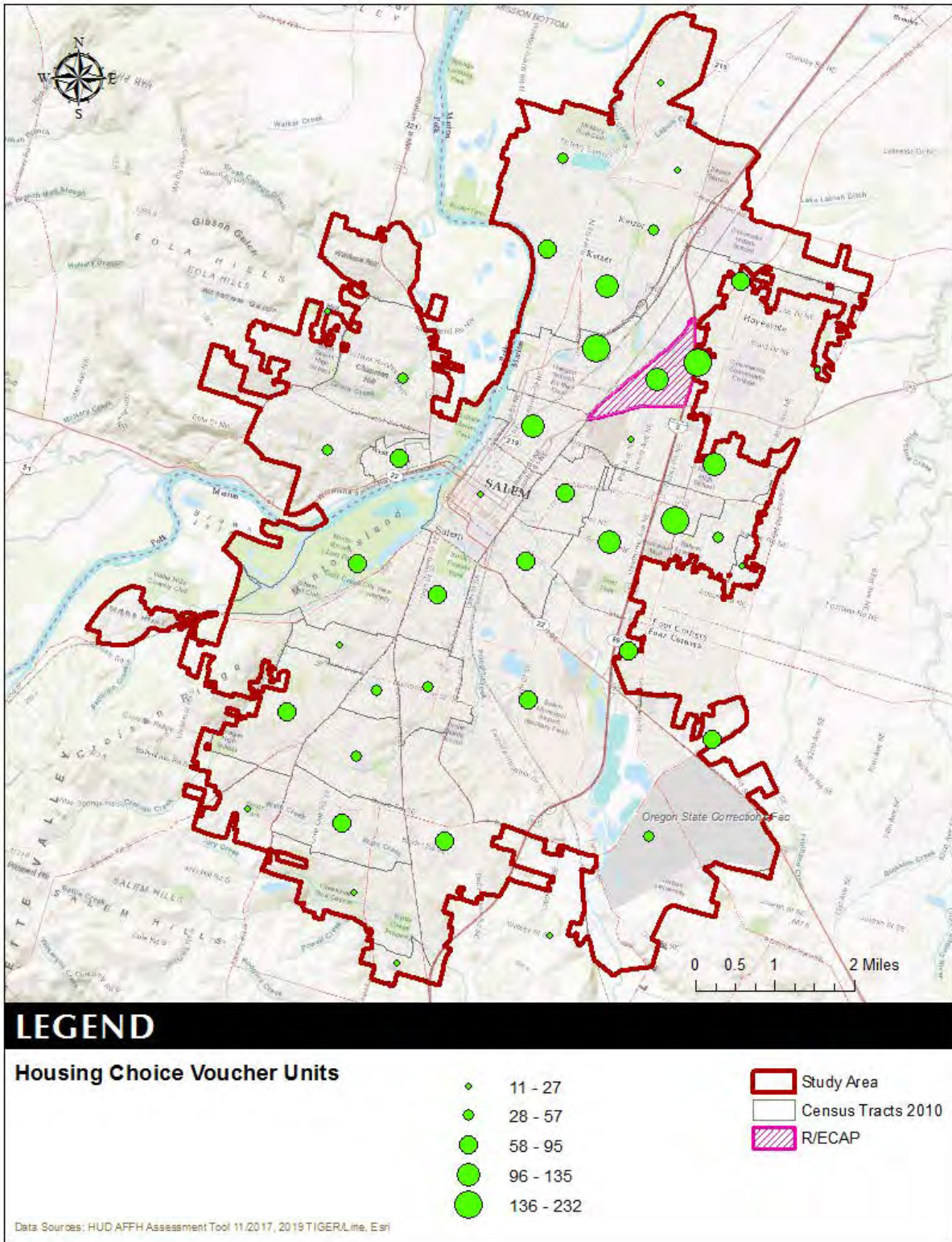
Map IV.17
Low Income Housing Tax Credit (LIHTC) Units
Salem-Keizer
2017 ACS, 2017 Tigerline, HUD AFFH Tool

LEGEND

Low-Income Housing Tax Credit Units

·	4 - 16
•	17 - 31
•	32 - 60
•	61 - 124
•	125 - 224

Study Area
Census Tracts 2010
R/ECAP

Data Sources: HUD AFFH Assessment Tool 11/2017, 2019 TIGER/Line, Esri
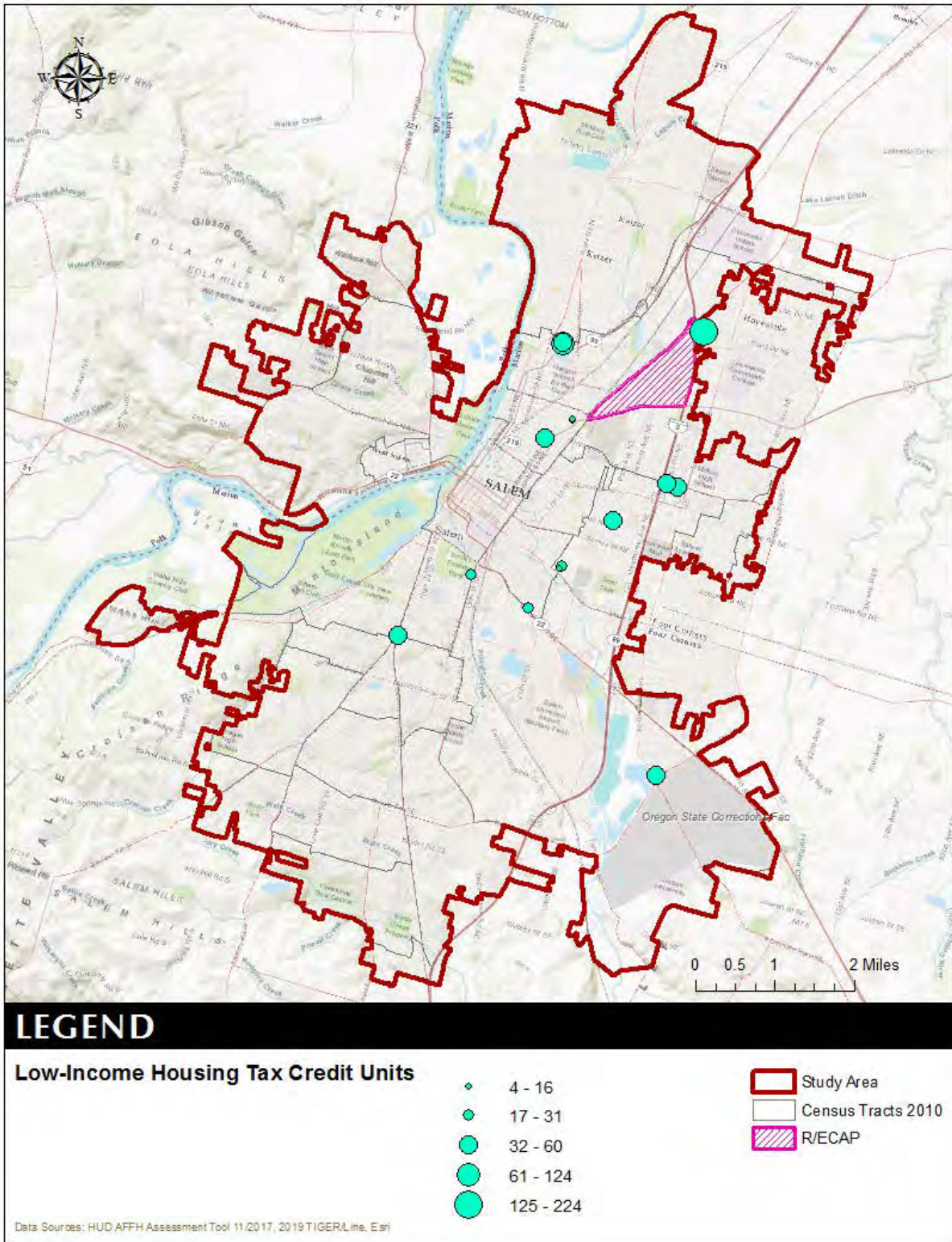
Map IV.18
Other HUD Multi-Family Units
Salem-Keizer
2017 ACS, 2017 Tigerline, HUD AFFH Tool

LEGEND

Assisted Multi-Family Units

·	0 - 10
•	11 - 24
●	25 - 40
●	41 - 62
●	63 - 87

Study Area
Census Tracts 2010
R/ECAP

Data Sources: HUD AFFH Assessment Tool 11/2017, 2019 TIGER/Line, Esri
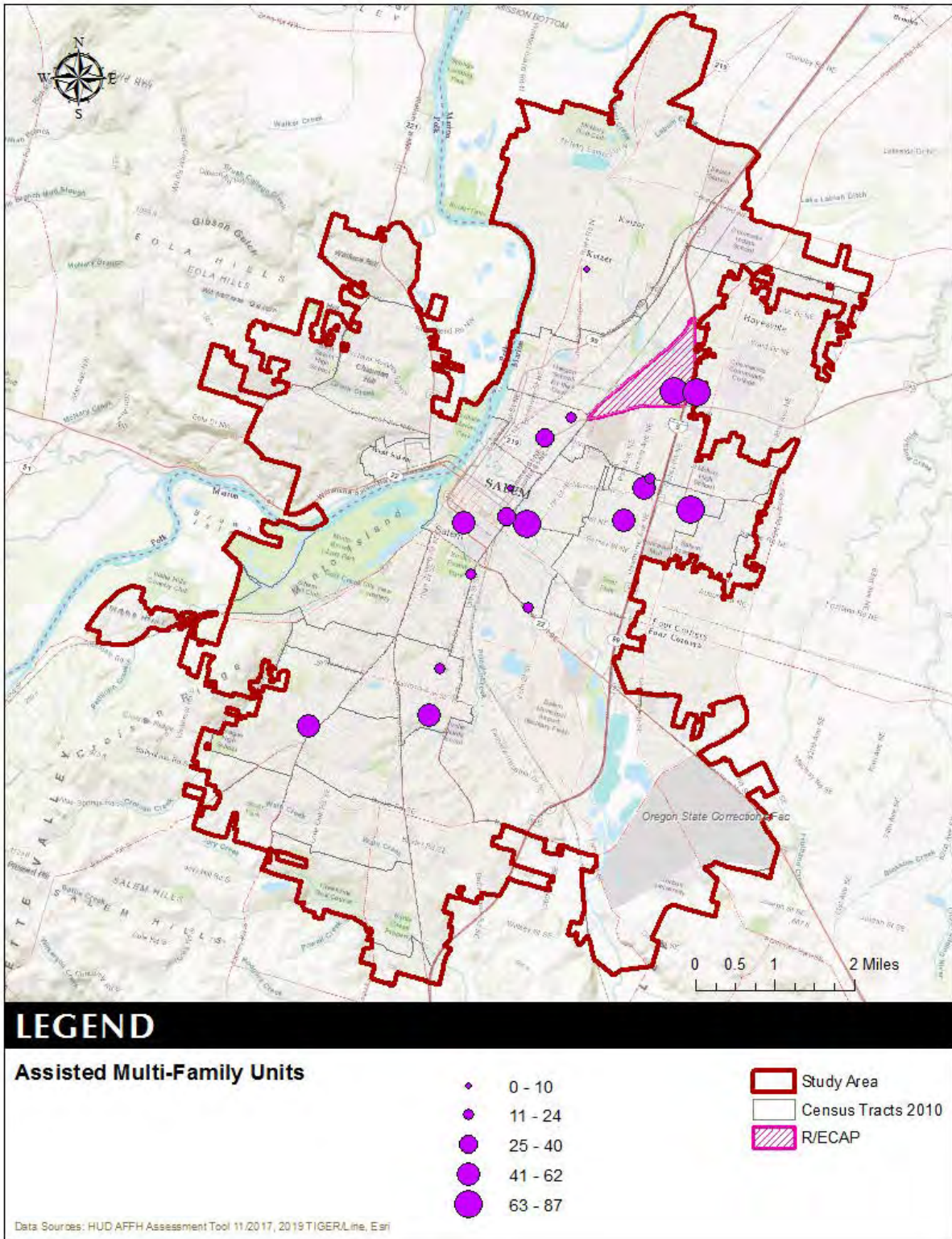
G. Disability and Access

The Fair Housing Act (FHA) prohibits discrimination in the sale, rental, and financing of housing and in other housing-related transactions on the basis of seven protected classes, including disability. In addition, people with disabilities have three additional protections under the FHA:[20]

- Multifamily housing with four or more units, built for first occupancy after March 13, 1991, must meet specific accessibility requirements that allow for a person with disabiltiies to access and use both the housing units and associated public use and common use areas.
- Housing providers must make reasonable accomodations to their rules, policies, practices, and services necessary for people with disabilities to equally enjoy the property.
- Housing providers must allow residents with disabilties, at the residents' expense, to make reasonable modifications to physical structure necessary in order for them to use and enjoy the property.

Section 503 of the Rehabilitation Act of 1973 prohibits discrimination based on disability in any program or activity receiving federal assistance.[21] Title II of the Americans with Disabilities Act of 1990 prohibits discrimination based on disability by public entities. HUD enforces the housing-related activities of public entities, including public housing, housing assistance, and housing referrals.[22]

DISABILITY

Disability by age, as estimated by the 2017 ACS, is shown in Table IV.39. The disability rate for females was 15.5 percent, compared to 14.7 percent for males. The disability rate grew precipitously higher with age, with 52.5 percent of those over 75 experiencing a disability.

Table IV.39 Disability by Age Salem-Keizer 2017 Five-Year ACS Data						
	Male		Female		Total	
Age	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	88	1.3%	98.0	1.5%	186	1.4%
5 to 17	1,731	9.6%	875	5.0%	2,606	7.3%
18 to 34	2,319	9.9%	2,002	8.3%	4,321	9.1%
35 to 64	5,276	15.1%	6,687	18.1%	11,963	16.6%
65 to 74	2,214	31.2%	2,318	27.7%	4,532	29.3%
75 or Older	2,362	52.5%	3,644	52.5%	6,006	52.5%
Total	**13,990**	**14.7%**	**15,624**	**15.5%**	**29,614**	**15.1%**

The number of disabilities by type, as estimated by the 2017 ACS, is shown in Table IV.40. Some 7.6 percent have an ambulatory disability, 6.7 percent have an independent living disability, and 3.1 percent have a self-care disability.

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[20] U.S. Department of Housing and Urban Development, Office of Policy Development and Research. Study of Rental Housing Discrimination on the Basis of Mental Disabilities, August 2017.
[21] 29 U.S.C. §§794
[22] 42 U.S.C. §§ 12131 – 12165

Table IV.40
Total Disabilities Tallied: Aged 5 and Older
Salem-Keizer
2017 Five-Year ACS

Disability Type	Population with Disability	Percent with Disability
Hearing disability	8,643	4.4%
Vision disability	4,747	2.4%
Cognitive disability	12,577	6.9%
Ambulatory disability	13,879	7.6%
Self-Care disability	5,722	3.1%
Independent living disability	9,810	6.7%

HOUSING ACCESSIBILITY

Accessible housing units are located throughout Salem-Keizer. However, many newer housing units are located outside city center areas. These newer housing units are more likely to have the mandatory minimum accessibility features.

Some 27.6 percent of publicly supported housing units, according to HUD's AFFH database, are accessible. This exceeds the rate of disability for the general population in the City. However, this does not account for additional publicly supported housing units from City data, or for market rate housing.

Table IV.41
Residents with Disabilities by Subsidized Housing Type
Salem-Keizer city
HUD AFFH Raw Database

Program	Total Units	Total Disabled Units
Public Housing	505	167
Project Based Section 8	620	164
Other HUD Multifamily	67	0.0
Housing Choice Vouchers	0	0.0
Total	**1192**	**331**

DISPARITIES IN ACCESS TO OPPORTUNITY

The distribution of persons with disabilities did not correspond with a lack of access to opportunity in Salem-Keizer. Public input did not suggest any lack of access to opportunity based on disability. Maps 19 through 24 showing the concentration of persons with various types of disabilities are included on the following pages.

Map IV.19
Persons with Vision Disabilities
Salem-Keizer
2017 ACS, Tigerline

LEGEND

Persons with Vision Disabilities

Tallied Persons with a Vision Disability
as a Percentage of Total Disabilities Tallied
Ages 5 and Older by Census Tract

Data Sources: 2013-2017 ACS, 2019 TIGER/Line, 2019 Esri

	4.4 - 6.5%
	6.5 - 13.7%
	13.7 - 18.9%
	18.9 - 24.1%
	24.1 - 38.8%

Study Area
Census Tracts 2010
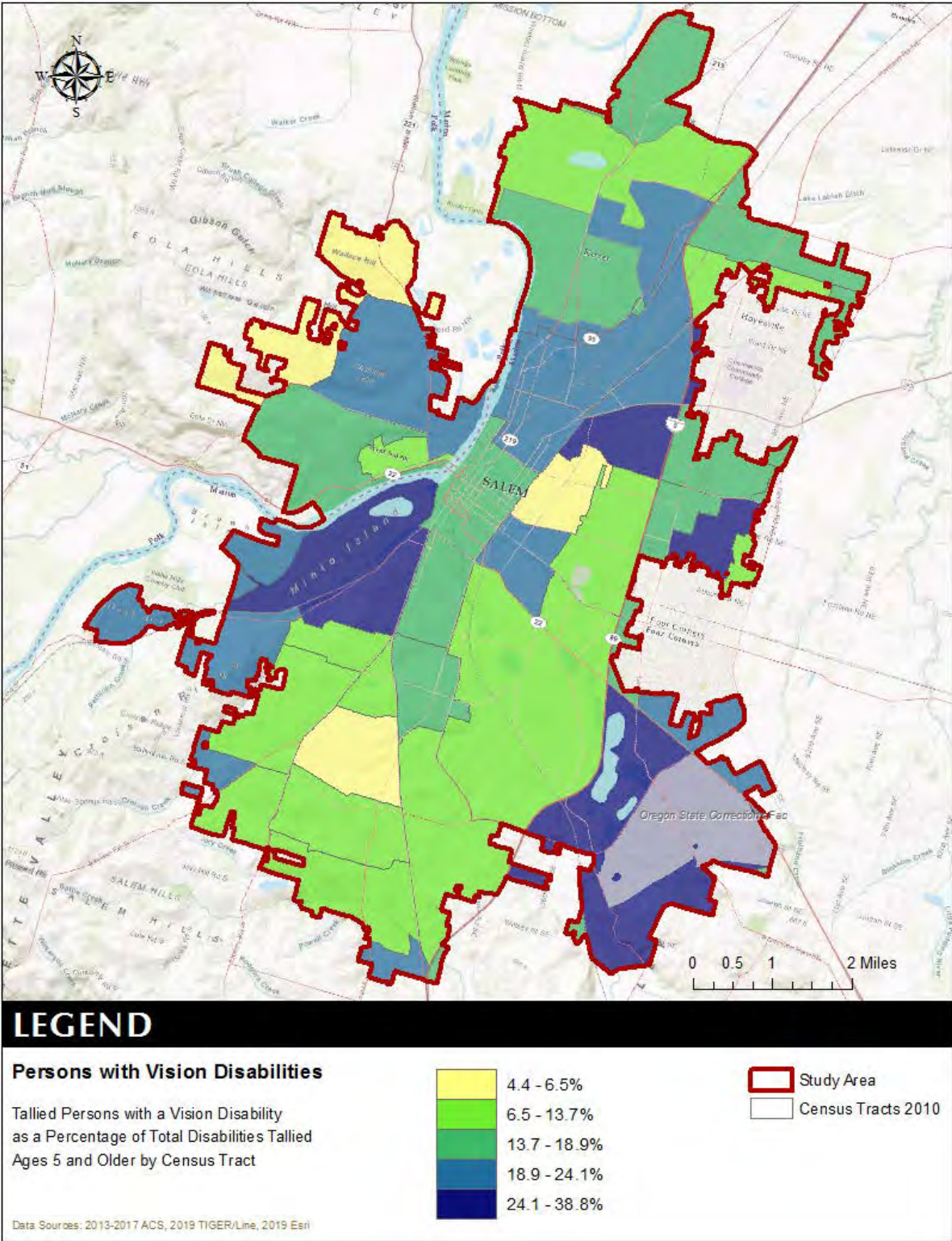
Map IV.20
Persons with Self-Care Disabilities
Salem-Keizer
2017 ACS, Tigerline
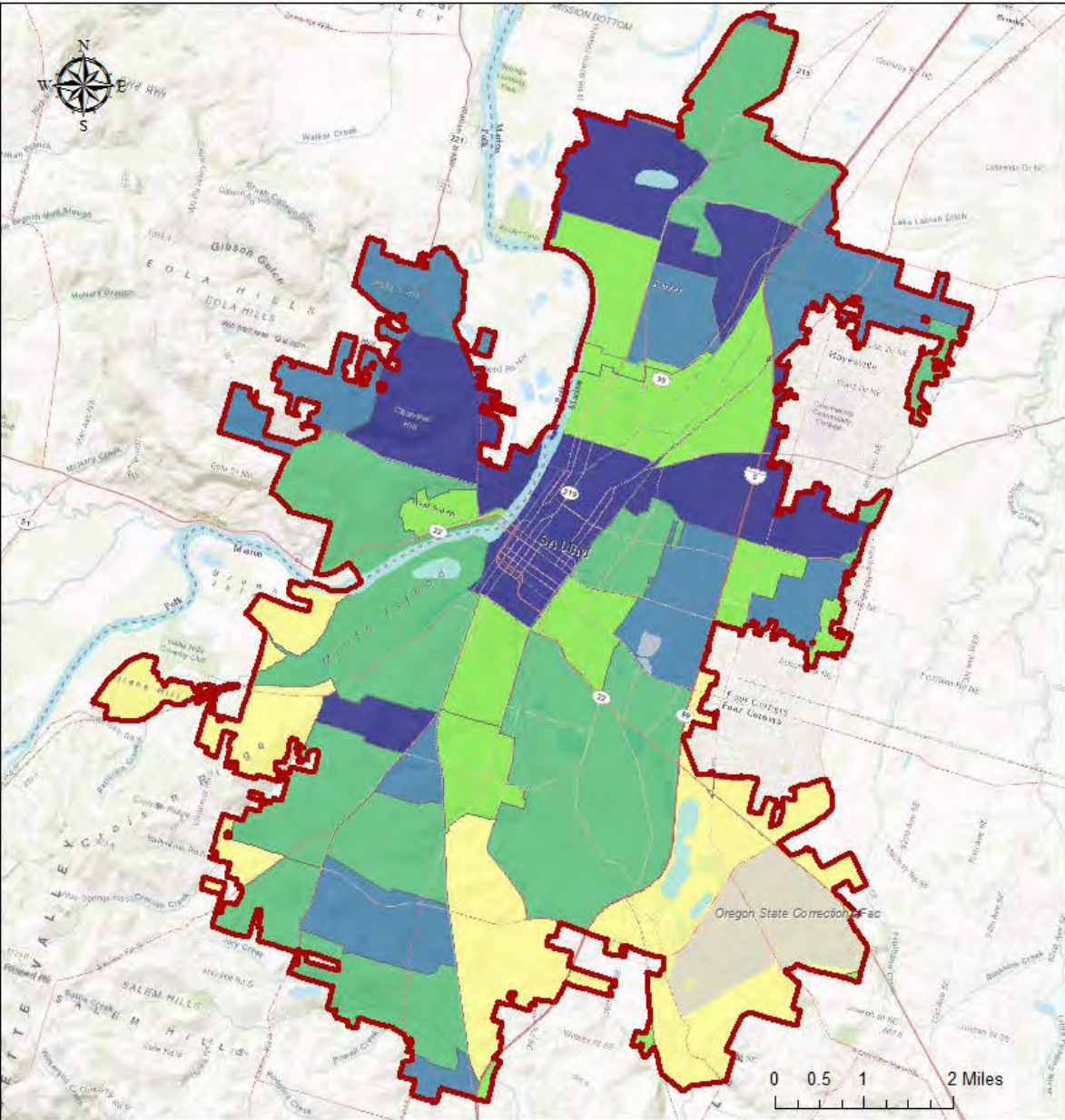
LEGEND

Persons with Self-Care Disabilities

Tallied Persons with a Self-Care Disability
as a Percentage of Total Disabilities Tallied
Ages 5 and Older by Census Tract

Data Sources: 2013-2017 ACS, 2019 TIGER/Line, 2019 Esri

- 6.4 - 11.9%
- 11.9 - 15.7%
- 15.7 - 19.0%
- 19.0 - 23.5%
- 23.5 - 32.8%

- Study Area
- Census Tracts 2010

Map IV.21
Persons with Independent Living Difficulty Disabilities
Salem-Keizer
2017 ACS, Tigerline

LEGEND

Persons with Independent Living Difficulty Disabilities

Tallied Persons with an Independent Living Difficulty Disability as a Percentage of Total Disabilities Tallied Ages 5 and Older by Census Tract

☐	21.4 - 26.6%
☐	26.6 - 31.2%
☐	31.2 - 35.8%
☐	35.8 - 41.0%
☐	41.0 - 50.8%

☐ Study Area
☐ Census Tracts 2010

Data Sources: 2013-2017 ACS, 2019 TIGER/Line, 2019 Esri

Map IV.22
Persons with Hearing Disabilities
Salem-Keizer
2017 ACS, Tigerline

LEGEND

Persons with Hearing Disabilities

Tallied Persons with a Hearing Disability
as a Percentage of Total Disabilities Tallied
Ages 5 and Older by Census Tract

Data Sources: 2013-2017 ACS, 2019 TIGER/Line, 2019 Esri

- 8.5 - 15.8%
- 15.8 - 23.8%
- 23.8 - 30.5%
- 30.5 - 37.3%
- 37.3 - 44.9%

- Study Area
- Census Tracts 2010
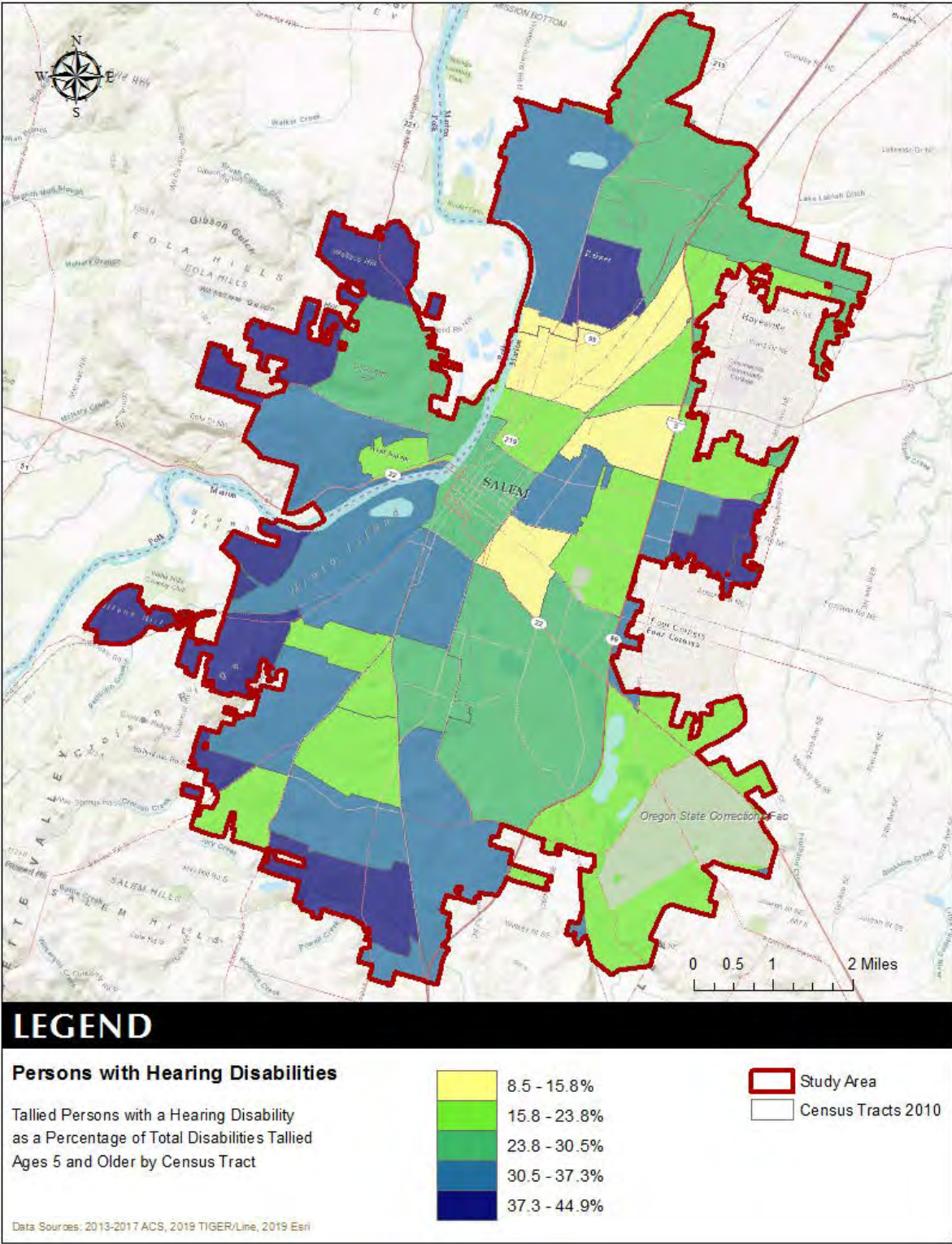
Map IV.23
Persons with Cognitive Disabilities
Salem-Keizer
2017 ACS, Tigerline

LEGEND

Persons with Cognitive Disabilities

Tallied Persons with a Cognitive Disability
as a Percentage of Total Disabilities Tallied
Ages 5 and Older by Census Tract

Data Sources: 2013-2017 ACS, 2019 TIGER/Line, 2019 Esri

22.3 - 32.2%	
32.2 - 40.1%	
40.1 - 45.2%	
45.2 - 52.5%	
52.5 - 62.1%	

Study Area
Census Tracts 2010
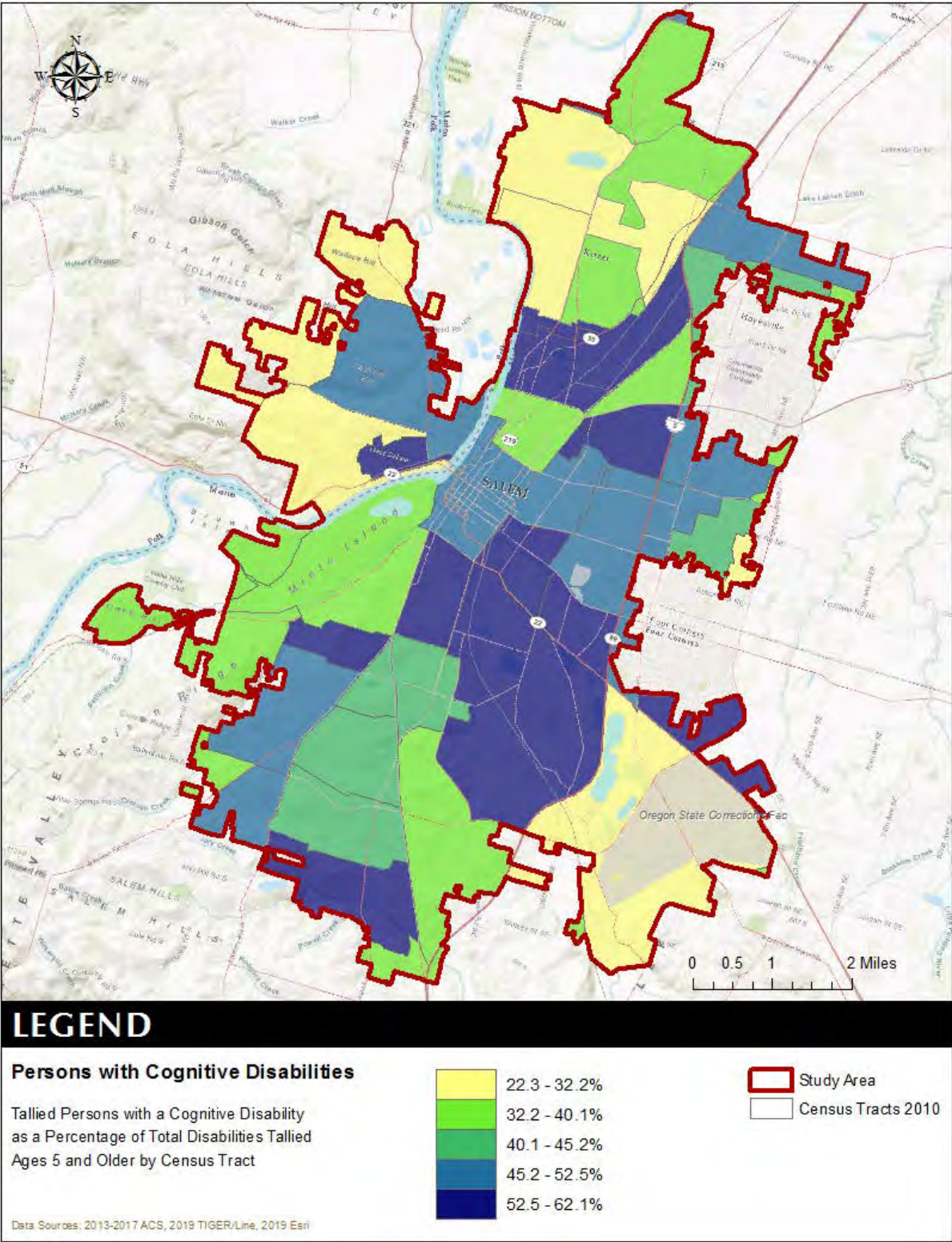
Map IV.24
Persons with Ambulatory Disabilities
Salem-Keizer
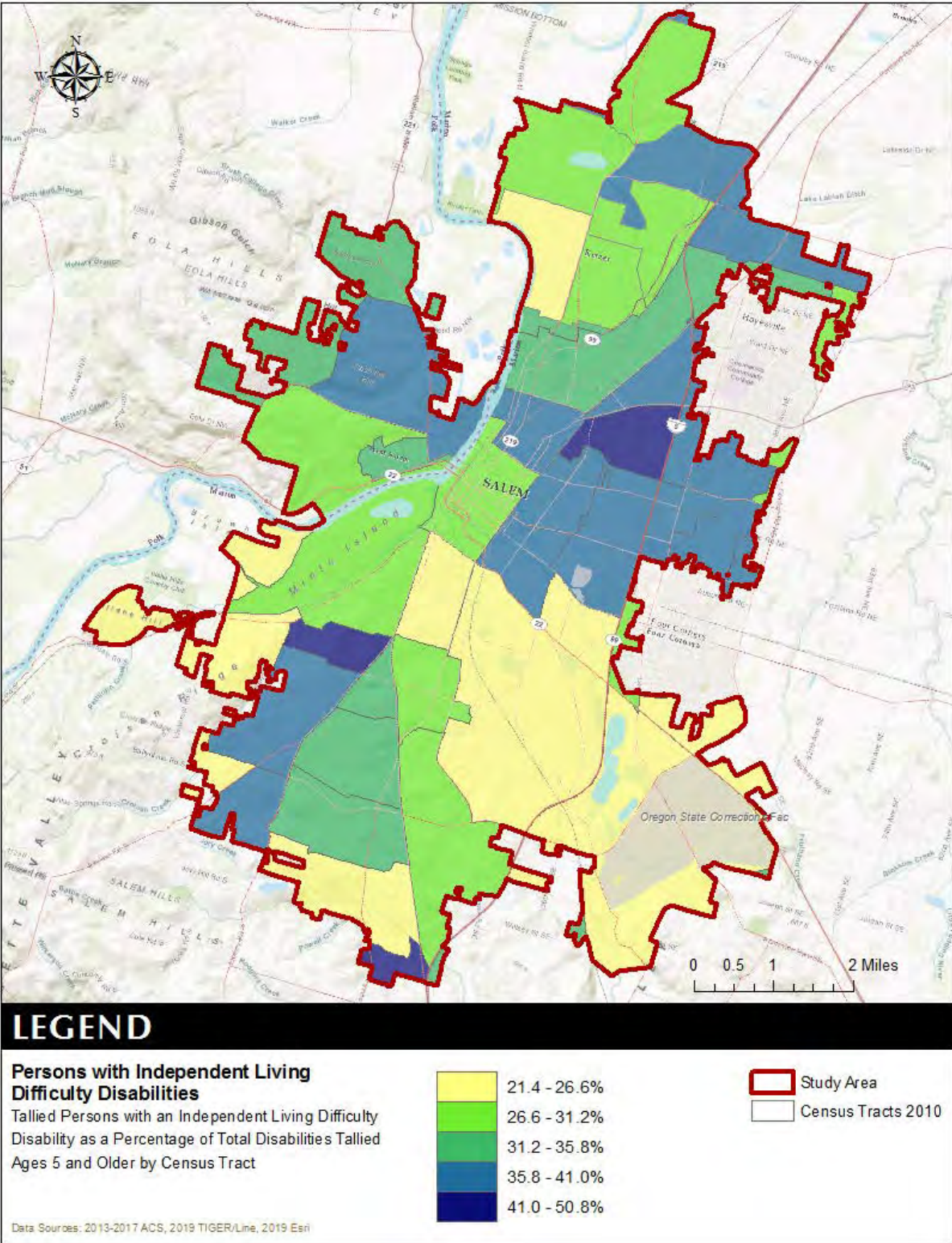2017 ACS, Tigerline

LEGEND

Persons with Ambulatory Disabilities

Tallied Persons with a Vision Disability
as a Percentage of Total Disabilities Tallied
Ages 5 and Older by Census Tract

Data Sources: 2013-2017 ACS, 2019 TIGER/Line, 2019 Esri

24.6 - 33.5%	
33.5 - 42.1%	
42.1 - 48.5%	
48.5 - 55.3%	
55.3 - 64.1%	

Study Area
Census Tracts 2010
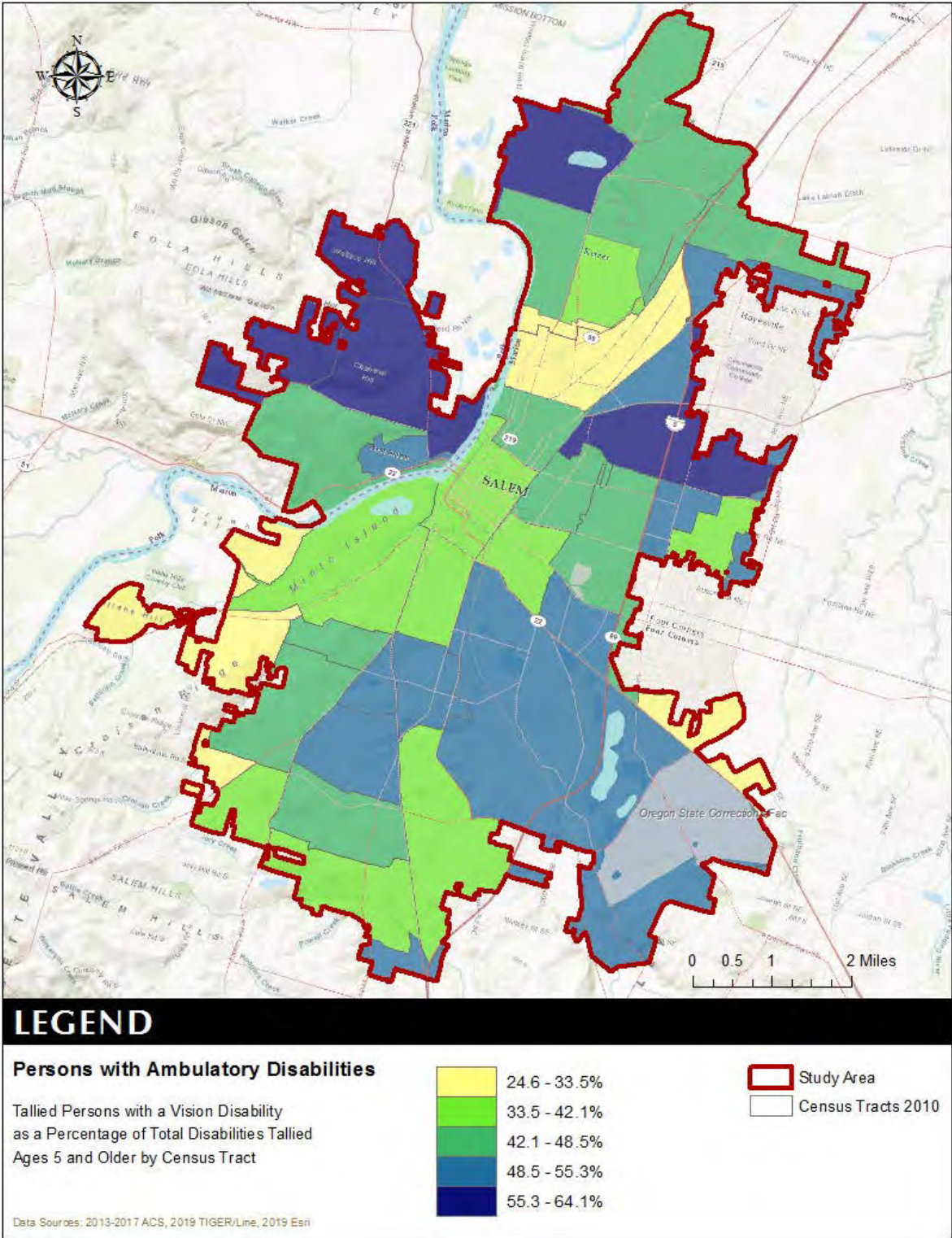
H. Fair Housing Enforcement, Outreach Capacity, and Resources

Title VIII of the 1968 Civil Rights Act, also known as the Federal Fair Housing Act, made it illegal to discriminate in the buying, selling, or renting of housing based on a person's race, color, religion, or national origin. Sex was added as a protected class in the 1970s. In 1988, the Fair Housing Amendments Act added familial status and disability to the list, making a total of seven federally protected characteristics.

Provisions to affirmatively further fair housing are long-standing components of the U.S. Department of Housing and Urban Development's (HUD's) housing and community development programs. These provisions come from Section 808(e) (5) of the Federal Fair Housing Act, which requires that the Secretary of HUD administer federal housing and urban development programs in a manner that affirmatively furthers fair housing.

In 1994, HUD published a rule consolidating plans for housing and community development programs into a single planning process. This action grouped the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grants (ESG)[23], and Housing Opportunities for Persons with AIDS (HOPWA) programs into the Consolidated Plan for Housing and Community Development, which then created a single application cycle. As a part of the consolidated planning process, and entitlement communities that receive such funds from HUD are required to submit to HUD certification that they are affirmatively furthering fair housing (AFFH). This was described in the Analysis of Impediments to Fair Housing Choice and a Fair Housing Planning Guide offering methods to conduct such a study was released in March of 1993.

In September of 2010, The U.S. Government Accountability Office (GAO) released a report which found that "HUD's limited regulatory requirements and oversight" contributed to many HUD program participants placing a "low priority on ensuring that their AIs serve as effective planning tools".[24] The report recommended that HUD require grantees to update their AIs periodically, follow a specific format, and submit them for review.

On July 19, 2013, HUD released a new Affirmatively Furthering Fair Housing Proposed Rule (AFFH), which gave a format, a review process, and content requirements for the newly named "Assessment of Fair Housing", or AFH. The rule is designed to overcome historic patterns of segregation, reduce racial or ethnic concentrations of poverty, and respond to disproportionate housing needs, while reducing disparities in housing choice and access to housing for persons in protected classes.

The rule replaced the requirement that HUD grantees complete an Analysis of Impediments (AI) with an Assessment of Fair Housing, which allows grantees to assess fair housing determinants, prioritize fair housing issues for response, and take meaningful actions to affirmatively further fair housing. In addition, the fair housing assessment and planning process was improved by providing uniform data on patterns of integration, racially and ethnically concentrated areas of poverty, access to community assets and disproportionate housing needs based on the classes protected by the Fair Housing Act. The proposed rule incorporated fair housing planning into existing planning processes, the

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[23] The Emergency Shelter Grants program was renamed the Emergency Solutions Grants program in 2011.
[24] HUD Needs to Enhance Its Requirements and Oversight of Jurisdictions' Fair Housing Plans. GAO-10-905, Sept. 14, 2010.

consolidated plan, and Public Housing Agency plans, encouraged regional approaches, and emphasized public participation.

The AFH would also include measures of segregation and integration and provide some historical context about how such concentrations became part of the community's legacy. Together, these considerations were then intended to better inform public investment decisions that would lead to amelioration or elimination of such segregation, enhancing access to opportunity, promoting equity, and hence housing choice. All this would be completed by using an on-line Assessment Tool.

However, on January 5, 2018, HUD issued a notice that extended the deadline for submission of an AFH by local government consolidated plan program participants to their next AFH submission date that falls after October 31, 2020. Then, on May 18, 2018, HUD released three notices regarding the AFFH; one eliminated the January 5, 2018, guidance; a second withdrew the on-line Assessment Tool for local government program participants; and, the third noted that the AFFH certification remains in place. HUD went on to say that the AFFH databases and the AFFH Assessment Tool guide would remain available for the AI; and, encouraged jurisdictions to use them, if so desired.

Federal laws provide the backbone for U.S. fair housing regulations. The following federal and state rules, regulations, and executive orders inform municipalities and developers of their fair housing obligations and the rights of protected classes. Many of these statutes were successful in generating specialized resources, such as data, to aid organizations, government entities, and individuals in affirmatively furthering fair housing. While some laws have been previously discussed in this report, a list of laws related to fair housing, as defined on the U.S. Department of Housing and Urban Development's (HUD's) website, is presented below:

TITLE VIII OF THE CIVIL RIGHTS ACT OF 1968 (FAIR HOUSING ACT)[25]

The Fair Housing Act prohibits discrimination in the sale, rental, financing, and insuring of housing on the basis of race, color, religion, sex, and national origin. In 1988, the act was amended to include family status and disability as protected classes, which includes children under the age of 18 living with parents or legal custodians, pregnant women, and persons securing custody of children under the age of 18. Jurisdictions may add protected classes but are not allowed to subtract from the seven federally protected classes.[26] The Act also contains design and construction accessibility provisions for certain new multi-family dwellings developed for first occupancy on or after March 13, 1991.[27] On April 30, 2013, HUD and the Department of Justice released a Joint Statement that provides guidance regarding the persons, entities, and types of housing and related facilities that are subject to the accessible design and construction requirements of the Act.

It is unlawful under the Act to discriminate against a person in a protected class by: Refusing to sell or rent after the making of a bona fide offer, or to refuse to negotiate for the sale or rental of, or otherwise make unavailable or deny, a dwelling to any person because of race, color, religion, sex, familial status, or national origin; discriminating against any person in the terms, conditions, or

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[25] 42 U.S.C. 3601, et. Seq., as amended in 1988

[26] "HUD Fair Housing Laws and Presidential Executive Orders."
http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/FHLaws

[27] "Title VIII: Fair Housing and Equal Opportunity."
http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/progdesc/title8

privileges of sale or rental of a dwelling, or in the provision of services or facilities based on a protected class; representing that a dwelling is not available for inspection, sale, or rental when it is, in fact, available; publishing an advertisement indicating any preference, limitation, or discrimination against a protected class; or refusing to allow a person with a disability to make a reasonable modification to the unit at the renter's own expense.

There are several exceptions to the law. It is legal for developments or buildings for the elderly to exclude families with children. In addition, single-family homes being sold by the owner of an owner-occupied 2 family home may be exempt, unless a real estate agency is involved, if they have advertised in a discriminatory way, or if they have made discriminatory statements. There are no exemptions for race discrimination because race is covered by other civil rights laws.

The following are examples of Fair Housing Act violations:

- Making any representation, directly or implicitly, that the presence of anyone in a protected class in a neighborhood or apartment complex may or will have the effect of lowering property taxes, reduce safety, make the neighborhood and/or schools worse, change the character of the neighborhood, or change the ability to sell a home.

- Providing inconsistent, lesser, or unequal service to customers or clients who are members of a protected class, such as failing to return calls from a buyer agent to avoid presenting a contract to your seller, avoiding or delaying an appointment for a showing a listing, making keys unavailable, failing to keep appointments, or refusing maintenance or repairs to an apartment.

- Requiring higher standards for a member of a protected class, including asking for more references or demanding a higher credit rating.

- Requiring employers to make distinctions on applications, or in the application process, among protected class members, including marking applications to indicate race, sex, etc. of applicant or misrepresenting availability for particular protected classes.

- Advertising in a manner that indicates a preference for a particular class and thereby excluding protected class members.

TITLE VI OF THE CIVIL RIGHTS ACT OF 1964

Title VI prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance, including denying assistance, offering unequal aid, benefits, or services, aiding or perpetuating discrimination by funding agencies that discriminate, denying planning or advisory board participation, using discriminatory selection or screening criteria, or perpetuating the discrimination of another recipient based on race, color, or national origin.

SECTION 504 OF THE REHABILITATION ACT OF 1973

The Act prohibits discrimination based on disability in any program or activity receiving federal financial assistance. The concept of "reasonable accommodations" and "reasonable modifications" was clarified in memos dated May 17, 2004 and March 5, 2008. Reasonable accommodations are changes in rules, policies, practices, or services so that a person with a disability can participate as fully in housing activities as someone without a disability. Reasonable modifications are structural changes made to existing premises, occupied or to be occupied by a person with a disability so they can fully enjoy the premises.

SECTION 109 OF THE HOUSING AND COMMUNITY DEVELOPMENT ACT OF 1974

Section 109 prohibits discrimination on the basis of race, color, national origin, sex or religion in programs or activities funded from HUD's Community Development Block Grant Program.

TITLE II OF THE AMERICANS WITH DISABILITIES ACT OF 1990

Title II applies to state and local government entities and protects people with disabilities from discrimination on the basis of disability in services, programs, and activities. HUD enforces Title II when it relates to state and local public housing, housing assistance and housing referrals.

ARCHITECTURAL BARRIERS ACT OF 1968

The Act requires that buildings and facilities designed, constructed, altered, or leased with certain federal funds after September 1969 be accessible to and useable by handicapped persons. The ABA specifies accessibility standards for ramps, parking, doors, elevators, restrooms, assistive listening systems, fire alarms, signs, and other accessible building elements and is enforced through the Department of Defense, HUD, the General Services Administration, and the U.S. Postal Services.

AGE DISCRIMINATION ACT OF 1975

The Age Discrimination Act prohibits discrimination on the basis of age in programs or activities receiving federal financial assistance, applies to all ages, and may be enforced by the head of any Federal department or agency by terminating grant funding for those with an express finding on the record who fail to comply with the Act after reasonable notice. HUD established regulations for implementation of the Age Discrimination Act for HUD programs.

TITLE IX OF THE EDUCATION AMENDMENTS ACT OF 1972

Title IX prohibits discrimination on the basis of sex or blindness in education programs or activities that receive federal financial assistance.[28]

THE HOME MORTGAGE DISCLOSURE ACT (HMDA)

HMDA requires both depository and non-depository lenders to collect and publicly disclose information about housing-related applications and loans, including the race, ethnicity, sex, loan

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[28] "HUD Fair Housing Laws and Presidential Executive Orders."

amount, and income of mortgage applicants and borrowers by Census tract. Depository institutions that meet the following criteria are required to report:

- Bank, credit union, or savings association
- Total assets must exceed the coverage threshold[29]
- The institution must have had a home or branch office in a Metropolitan Statistical Area (MSA)
- The institution must have originated or refinanced at least one home purchase loan secured by a first lien on a one- to four-family dwelling
- The institution must be federally insured or regulated
- The mortgage loan must have been insured, guaranteed, or supplemented by a federal agency or intended for sale to Fannie Mae or Freddie Mac

For other institutions, including non-depository institutions, the reporting criteria are:

- The institution must be a for-profit organization
- The institution's home purchase loan originations must equal or exceed 10 percent of the institution's total loan originations, or more than $25 million
- The institution must have had a home or branch office in an MSA or have received applications for, originated, or purchased five or more home purchase loans, home improvement loans, or refinancing on property located in an MSA in the preceding calendar year
- The institution must have assets exceeding $10 million or have originated 100 or more home purchases in the preceding calendar year

In addition to reporting race and ethnicity data for loan applicants, the HMDA reporting requirements were modified in response to the Predatory Lending Consumer Protection Act of 2002 as well as the Home Owner Equity Protection Act (HOEPA). Consequently, loan originations are now flagged in the data system for three additional attributes:

- If they are HOEPA loans
- Lien status, such as whether secured by a first lien, a subordinate lien, not secured by a lien, or not applicable (purchased loans)
- Presence of high-annual percentage rate loans (HALs), defined as more than three percentage points for purchases when contrasted with comparable treasury instruments or five percentage points for refinance loans

EXECUTIVE ORDER 11063 EQUAL OPPORTUNITY IN HOUSING

Signed by President Kennedy on November 20, 1962, the Order prohibits discrimination based on race, color, religion, creed, sex, or national origin in the sale, leasing, rental, or other disposition of properties and facilities owned, operated, or funded by the federal government. The Order also prohibits discrimination in lending practices that involve loans insured or guaranteed by federal government.

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[29] Each December, the Federal Reserve announces the threshold for the following year. The asset threshold may change from year to year based on changes in the Consumer price Index for Urban Wage Earners and Clerical Workers.

EXECUTIVE ORDER 12892 LEADERSHIP AND COORDINATION OF FAIR HOUSING IN FEDERAL PROGRAMS: AFFIRMATIVELY FURTHERING FAIR HOUSING

Signed by President Clinton on January 11, 1994, the Order required federal agencies to affirmatively further fair housing in the programs and activities with the Secretary of HUD coordinating the effort, and established the President's Fair Housing Council, which is chaired by the Secretary of HUD.

EXECUTIVE ORDER 12898 FEDERAL ACTIONS TO ADDRESS ENVIRONMENTAL JUSTICE IN MINORITY POPULATIONS AND LOW-INCOME POPULATIONS

Signed by President Clinton on February 11, 1994, the order requires federal agencies to practice environmental justice in its programs, policies, and activities. Specifically, developers and municipalities using federal funds must evaluate whether or not a project is located in a neighborhood with a concentration of minority and low-income residents or a neighborhood with disproportionate adverse environmental effects on minority and low-income populations. If those conditions are met, viable mitigation measures or alternative project sites must be considered.

EXECUTIVE ORDER 13166 IMPROVING ACCESS TO SERVICES FOR PERSONS WITH LIMITED ENGLISH PROFICIENCY

Signed by President Clinton on August 11, 2000, the Order eliminates limited English proficiency as a barrier to full and meaningful participation in federal programs by requiring federal agencies to examine the services they provide, identify the need for LEP services, then develop and implement a system to provide those services. The Department of Justice issued policy guidance which set forth compliance standards to ensure accessibility to LEP persons.

EXECUTIVE ORDER 13217 COMMUNITY BASED ALTERNATIVES FOR INDIVIDUALS WITH DISABILITIES

Signed by President Bush on June 18, 2001, the Order requires federal agencies to evaluate their policies and programs to determine if they need to be revised to improve the availability of community-based living arrangements for persons with disability, noting that isolating or segregating people with disabilities in institutions is a form of disability-based discrimination prohibited by Title II of the ADA.

FAIR HOUSING COMPLAINTS

HUD COMPLAINT PROCESS

When a complaint is submitted with HUD, intake specialists review the information and contact the complainant in order to gather additional details and determine if the case qualifies as housing discrimination. If the alleged discrimination occurred within the jurisdiction of a substantially equivalent state or local agency under the Fair Housing Assistance Program (FHAP), the complaint can be referred to that agency which has 30 days to address the complaint. If that agency fails to address the complaint within that time period, HUD can take the complaint back.

If HUD has jurisdiction and accepts the complaint for investigation, the agency will draft a formal complaint and send it to the complainant to be signed. Once HUD receives the signed complaint, the agency has ten days to notify the respondent that a complaint has been filed against him or her, and

the respondent has ten days from receiving the complaint to respond. The circumstances of the complaint are then investigated through interviews, document review, property surveys, testing, and other investigative strategies. During this time, the investigator attempts to have the parties rectify the complaint through conciliation.

The case is closed if conciliation between the two parties is achieved or if the investigator determines that there was no reasonable cause to believe that discrimination occurred. If conciliation fails, and reasonable cause is found, then either a federal judge or a HUD Administrative Law Judge hears the case and determines damages, if any. If a federal court judge finds that the alleged discrimination occurred, the respondent may be ordered to compensate the complainant for actual damages, including humiliation, pain, and suffering, provide injunctive or other equitable relief to make the housing available, pay the federal government a civil penalty to vindicate the public interest, and/or pay reasonable attorneys' fees and costs.

PENALTIES

On June 15, 2016, HUD published the interim final rule "Inflation Catch-up Adjustment of Civil Monetary Penalty Amounts", which adjusted penalty amounts to inflation for Fair Housing violations as mandated by the Federal Civil Penalties Inflation Adjustment Improvements Act of 2015.[30] Fair Housing Act violations that occur on or after August 16, 2016 could be fined a maximum penalty of $19,787 for a first violation. The maximum penalty for a second violation within five years is $49,467, and respondents who violate the Act two or more times within seven years face a maximum fine of $98,935.[31]

When the initial decision is rendered, any party who is adversely affected by the decision can petition the Secretary of HUD for review within 15 days. The Secretary has 30 days following the issuance of the initial decision to affirm, modify, or set aside the decision, or call for further review of the case. If the Secretary does not take any further action on the complaint within 30 days of the initial decision, the decision is considered final. After that, any aggrieved party must appeal to take up their grievance in the appropriate court of appeals.

HUD COMPLAINTS

Federal Fair Housing Law prohibits housing discrimination based on race, color, national origin, religion, sex, familial status, or disability. An individual may file a complaint if they feel their rights have been violated. HUD maintains records of complaints that represent potential and actual violations of federal housing law.

Fair Housing and Equal Opportunity (FHEO) begins its complaint investigation process shortly after receiving a complaint. A complaint must be filed within one year of the last date of the alleged discrimination under the Fair Housing Act. Other civil rights authorities allow for complaints to be filed after one year for good cause, but FHEO recommends filing as soon as possible. Generally, FHEO will either investigate the complaint or refer the complaint to another agency to investigate. Throughout

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[30] 81 FR 38931, June 15, 2016.

[31] Prior to the announcement, the fines were $16,000 for a first violation, $42,000 for a second violation, and $70,000 for three or more violations.

the investigation, FHEO will make efforts to help the parties reach an agreement. If the complaint cannot be resolved voluntarily by an agreement, FHEO may issue findings from the investigation. If the investigation shows that the law has been violated, HUD or the Department of Justice may take legal action to enforce the law.

Table IV.42, shows Fair Housing Complaints by basis for the period between 2008 and 2018. During this period, there were a total of 59 complaints. The most common complaint was on the basis of race, accounting for 40 complaints. This was following by disability, accounting for ten (10) complaints.

Table IV.42 Fair Housing Complaints by Basis City of Salem HUD Fair Housing Complaints												
Basis	**2008**	**2009**	**2010**	**2011**	**2012**	**2013**	**2014**	**2015**	**2016**	**2017**	**2018**	**Total**
Color	0	1	0	0	0	0	0	0	0	0	0	1
Disability	3	2	0	1	1	0	2	0	1	0	0	10
Familial Status	0	0	0	1	1	2	1	0	0	1	3	9
National Origin	0	0	2	2	2	2	0	0	1	0	0	9
Race	3	5	4	4	1	9	3	6	1	2	2	40
Retaliation	0	1	1	0	0	2	1	0	0	0	0	5
Sex	1	0	1	1	1	0	1	0	0	0	0	5
Total Basis	**7**	**9**	**8**	**9**	**6**	**15**	**8**	**6**	**3**	**3**	**5**	**79**
Total Complaints	7	7	5	6	4	11	5	6	2	2	4	59

Table IV.43, shows Fair Housing complaints by closure during this time period. In 30 of these complaints, there was no cause determination. In 18 of these complaints, there was successful settlement/conciliation.

Table IV.43
Fair Housing Complaints by Closure
City of Salem
HUD Fair Housing Complaints

Basis	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
Closed because trial has begun	0	0	0	0	0	0	0	0	0	1	1	2
Complainant failed to cooperate	0	0	0	1	1	0	0	0	0	0	1	3
Complaint withdrawn by complainant after resolution	0	2	0	0	1	0	0	0	0	0	0	3
Complaint withdrawn by complainant without resolution	0	0	0	0	1	0	0	0	0	0	0	1
Conciliation/settlement successful	0	1	3	1	0	7	3	1	0	1	1	18
No cause determination	7	3	2	3	1	4	2	5	2	0	1	30
Unable to locate complainant	0	0	0	1	0	0	0	0	0	0	0	1
Unable to locate respondent	0	1	0	0	0	0	0	0	0	0	0	1
Total Closures	**7**	**7**	**5**	**6**	**4**	**11**	**5**	**6**	**2**	**2**	**4**	**59**
Total Complaints	7	7	5	6	4	11	5	6	2	2	4	59

Table IV.44, shows Fair Housing complaints by issue. The most common issue, accounting for 29 complaints, was discriminatory refusal to rent. This was followed by failure to make reasonable accommodation, and discriminatory terms, conditions, privileges, or services and facilities, accounting for 28 and 27 complaints, respectively.

	Table IV.44 Fair Housing Complaints by Issue City of Salem HUD Fair Housing Complaints											
Issue	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
Discrimination in services and facilities relating to rental	1	0	0	0	0	0	1	0	0	0	0	2
Discrimination in the terms/conditions for making loans	1	3	3	1	0	1	1	1	1	0	0	12
Discriminatory acts under Section 818 (coercion, Etc.)	2	1	3	3	2	2	0	1	1	1	1	16
Discriminatory advertising, statements and notices	1	1	0	0	1	6	2	0	0	1	2	14
Discriminatory refusal to rent	3	4	1	3	2	7	2	1	1	2	3	29
Discriminatory refusal to rent and negotiate for rental	0	0	0	1	0	0	1	0	0	0	0	2
Discriminatory terms, conditions, privileges, or services and facilities	3	0	2	1	3	5	3	3	1	2	4	27
Failure to make reasonable accommodation	2	1	1	3	0	10	3	5	1	1	1	28
Failure to permit reasonable modification	0	1	2	0	0	0	0	0	0	0	0	3
Non-compliance with design and construction requirements (handicap)	0	2	0	0	0	1	0	0	0	0	0	3
None	0	0	0	0	0	0	0	0	0	0	0	0
Other discriminatory acts	0	0	0	0	0	0	1	0	0	0	0	1
Otherwise deny or make housing unavailable	0	0	0	0	0	0	1	2	0	1	1	5
Steering	0	0	0	0	0	1	0	0	0	0	0	1
Total Issues	13	13	12	11	8	33	15	13	5	8	12	143
Total Complaints	7	7	5	6	4	11	5	6	2	2	4	59

Complaints with cause by basis are shown in Table IV.45. The most common complaint with cause was for race, accounting for 15 of the 19 total complaints with cause.

Table IV.45 Fair Housing Complaints by Basis City of Salem HUD Fair Housing Complaints												
Basis	**2008**	**2009**	**2010**	**2011**	**2012**	**2013**	**2014**	**2015**	**2016**	**2017**	**2018**	**Total**
Race	0	2	3	0	0	6	1	1	0	1	1	15
Disability	0	1	0	1	1	0	0	0	0	0	0	3
Familial Status	0	0	0	0	0	2	1	0	0	0	0	3
National Origin	0	0	2	0	1	0	0	0	0	0	0	3
Retaliation	0	0	0	0	0	2	0	0	0	0	0	2
Color	0	0	0	0	0	0	0	0	0	0	0	0
Sex	0	0	0	0	0	0	0	0	0	0	0	0
Total Complaints Found with Cause	0	3	3	1	1	7	3	1	0	1	1	19

Of the 19 total complaints with cause between 2008 and 2018, some 18 had successful settlement/conciliation. This is shown in Table IV.46.

Table IV.46 Fair Housing Complaints by Closure City of Salem HUD Fair Housing Complaints												
Basis	**2008**	**2009**	**2010**	**2011**	**2012**	**2013**	**2014**	**2015**	**2016**	**2017**	**2018**	**Total**
Conciliation/settlement successful	0	1	3	1	0	7	3	1	0	1	1	18
Complaint withdrawn by complainant after resolution	0	2	0	0	1	0	0	0	0	0	0	3
Closed because trial has begun	0	0	0	0	0	0	0	0	0	0	0	0
Complainant failed to cooperate	0	0	0	0	0	0	0	0	0	0	0	0
Complaint withdrawn by complainant without resolution	0	0	0	0	0	0	0	0	0	0	0	0
No cause determination	0	0	0	0	0	0	0	0	0	0	0	0
Unable to locate complainant	0	0	0	0	0	0	0	0	0	0	0	0
Unable to locate respondent	0	0	0	0	0	0	0	0	0	0	0	0
Total Closures	**0**	**3**	**3**	**1**	**1**	**7**	**3**	**1**	**0**	**1**	**1**	**21**
Total Complaints Found with Cause	0	3	3	1	1	7	3	1	0	1	1	19

Fair Housing complaints with cause by issue are shown in Table IV.47. The most issue with complaints with cause was failure to make reasonable accommodation, accounting for 11 issues. This was followed by discriminatory refusal to rent, accounting for ten (10) issues.

Table IV.47 Fair Housing Complaints by Issue City of Salem HUD Fair Housing Complaints												
Issue	**2008**	**2009**	**2010**	**2011**	**2012**	**2013**	**2014**	**2015**	**2016**	**2017**	**2018**	**Total**
Discrimination in services and facilities relating to rental	0	0	0	0	0	0	0	0	0	0	0	0
Discrimination in the terms/conditions for making loans	0	1	1	1	0	1	1	1	0	0	0	6
Discriminatory acts under Section 818 (coercion, Etc.)	0	0	3	0	1	0	0	0	0	1	0	5
Discriminatory advertising, statements and notices	0	0	0	0	0	4	2	0	0	0	0	6
Discriminatory refusal to rent	0	1	1	0	0	5	2	0	0	1	0	10
Discriminatory refusal to rent and negotiate for rental	0	0	0	0	0	0	1	0	0	0	0	1
Discriminatory terms, conditions, privileges, or services and facilities	0	0	2	0	1	2	1	0	0	1	1	8
Failure to make reasonable accommodation	0	1	0	0	0	6	1	1	0	1	1	11
Failure to permit reasonable modification	0	0	2	0	0	0	0	0	0	0	0	2
Non-compliance with design and construction requirements (handicap)	0	1	0	0	0	1	0	0	0	0	0	2
None	0	0	0	0	0	0	0	0	0	0	0	0
Other discriminatory acts	0	0	0	0	0	0	1	0	0	0	0	1
Otherwise deny or make housing unavailable	0	0	0	0	0	0	1	0	0	0	0	1
Steering	0	0	0	0	0	0	0	0	0	0	0	0
Total Issues	**0**	**4**	**9**	**1**	**2**	**19**	**10**	**2**	**0**	**4**	**2**	**53**
Total Complaints Found with Cause	0	3	3	1	1	7	3	1	0	1	1	19

Human Rights Complaints/Concerns 2018

Please note:

- Cases included here reflect residents' perception of possible discrimination.
- Cases were assisted through conciliatory services and information and referral by Commissioners/Commission staff.

	Employment	Housing	Public Accommodations	Police/Law Enforcement	Neighbor	Other	Total
Race/ethnicity		1	1	1	4	1*	8
National Origin	1			1			2
Age	1*	1*	1				3
Sex							
Disability	1	1, 1*	3	1			7
Religion						1*	1
Sexual Orientation	1*						1
Gender Identity		1*	2			1	4
Source of Income							
Multiple categories							
Other						1	1
Total	4	5	7	3	4	3	23 unique persons with 27 concerns

Asterisk (*) refers to situations affecting multiple categories.

Other information, trouble shooting and referral:

HUMAN RIGHTS AND RELATIONS ADVISORY COMMISSION: SUMMARY OF DISCRIMINATION REPORTS RECEIVED
Numbers here do not reflect an accurate picture of discrimination in Salem. Commissioners understand discrimination incidents to be generally unreported; further, reported situations do not reflect sustained or confirmed incidents.

	2015	2016	2017*
Age	1	0	0
Disability	5	3	2
Familial Status	0	0	0
Gender identity	1	0	4
Marital Status	0	0	0
Race, ethnicity, color or national origin	4	10	20*
Religion	0	2	8*
Sex	0	0	2*
Sexual orientation	0	0	4*
Source of income	1	0	0

Asterisk refers to situations affecting multiple categories. Although there were 33 situations reported in 2017, more than 33 are indicated here to illustrate the communities affected. For example, one situation may relate to both age and disability.

I. Fair Housing Survey Results

The Fair Housing Survey has a total of 56 responses to date. The majority of survey respondents, to-date, are service providers.

Table IV.48	
Role of Respondent	
Salem-Keizer	
2019 Fair Housing Survey Data	
Primary Role	**Total**
Service Provider	46
Local Government	8
Law/Legal services	1
Homeowner or Renter	0
Property Management	0
Insurance	0
Construction/Development	0
Lending/Mortgage industry	0
Real Estate Sales/ Brokerage	0
Appraisal	0
Other (please specify)	0
Missing	0
Total	**56**

As seen in Table IV.49, some 24 respondents are renters, while 25 are homeowners. The other respondents either classified their housing situation as "other," or did not answer the question.

Table IV.49	
Homeowner or Renter	
City of Salem	
2019 Fair Housing Survey Data	
Familiarity	**Total**
Homeowner	25
Renter	24
Other	6
Missing	0
Total	**56**

Respondents were somewhat familiar with fair housing laws, overall, with 25 respondents.

Table IV.50	
How Familiar are you with Fair Housing Laws?	
Salem-Keizer	
2019 Fair Housing Survey Data	
Familiarity	**Response**
Very familiar	10
Somewhat Familiar	25
Not Familiar	8

As seen in Table IV.51, a majority of respondents feel that fair housing laws are difficult to understand. However, only seven (7) respondents think fair housing laws are adequately enforced.

Table IV.51 Federal, State, and Local Fair Housing Laws Salem-Keizer 2019 Fair Housing Survey Data					
Question	Yes	No	Don't Know	Missing	Total
Do you think fair housing laws are difficult to follow or understand?	40	1	1	0	56
Do you think fair housing laws are adequately enforced?	7	17	18	0	56

Some 13 respondents were aware of a training process available to learn about fair housing laws. Seven (7) respondents were aware of fair housing testing. Ten respondents had attended fair housing trainings.

Table IV.52 Fair Housing Activities Salem-Keizer 2019 Fair Housing Survey Data				
Question	Yes	No	Missing	Total
Are you aware of any educational activities or training opportunities to learn about fair housing?	13	22	4	0
Have you participated in any fair housing trainings or activities?	10	7	0	0
Are you aware of any fair housing testing of any sort in the city?	7	26	5	0

Respondents were most likely to receive fair housing education through a community service provider or seminar with a company.

Table IV.53 If you have received fair housing training, where or how did you receive training? Salem-Keizer 2019 Fair Housing Survey Data	
Tenure	Total
Through legal consult	0
Online program or webinar	1
Seminar with company	4
Discussion topic at meeting	0
Community Service provider	5
Other	46
Missing	0
Total	**56**

Barriers to fair housing in the private sector are shown in Table IV.54. Respondents were most likely to be aware of questionable practices or barriers to fair housing choice in the rental market industry.

Table IV.54 Barriers to Fair Housing in the Private Sector Salem-Keizer 2019 Fair Housing Survey Data				
Question	**Yes**	**No**	**Missing**	**Total**
Are you aware of any questionable practices or barriers to fair housing choice in:				
The rental housing market?	12	13	8	0
The real estate industry?	7	13	14	0
The mortgage and home lending industry?	3	13	16	0
The housing construction or accessible housing design fields?	8	13	13	0
The home insurance industry?	3	14	15	0
The home appraisal industry?	3	13	17	0
Any other housing services?	4	10	18	0

Barriers to fair housing in the public sector are shown in Table IV.55. The most respondents identify questionable practices or barriers to fair housing choice in limited access to governmental services, such as employment services

Table IV.55 Barriers to Fair Housing in the Public Sector Salem-Keizer 2019 Fair Housing Survey Data				
Question	**Yes**	**No**	**Missing**	**Total**
Are you aware of any questionable practices or barriers to fair housing choice in:				
Limited access to government services, such as employment services or transportation?	22	9	1	0
Land use policies?	8	10	12	0
Zoning laws?	8	7	16	0
Are you aware of any other local government actions or regulations in your community that act as barriers to fair housing?	6	8	16	0
Neighborhood or community development policies?	4	9	17	0
Occupancy standards or health and safety codes?	3	11	17	0
Permitting process?	3	10	17	0
Property assessment and tax policies?	2	8	19	0
Housing construction standards?	2	9	19	0

Table IV.56, rates how respondents feel that individual contributing factors affect their communities. The lack of affordable housing has a significant impact on the community, followed by lack of access to public transportation, mental health, and affordable public housing.

Table IV.56 Community access Salem-Keizer 2019 Fair Housing Survey Data					
Question	**Not at all**	**Slightly**	**Moderately**	**Significantly**	**Don't know**
Are you and/or your community affected by lack of access to any of these factors listed below:					
Lack of affordable housing	1	1	1	29	0
Access to public transportation to schools, work, health care, services?	2	1	4	25	0
Access to mental health care?	2	1	3	25	0
Lack of affordable Public Housing	3	2	2	25	0
Access for seniors and/or people with disabilities to public transportation?	1	3	8	18	2
Access to good nutrition, healthy food, fresh vegetables, etc?	4	8	5	15	0
Access for acceptance of housing choice vouchers	3	2	6	15	6
Access to proficient Public Schools?	6	2	9	13	1
Gentrification and displacement due to economic pressures	7	2	8	12	3
Access to health care?	3	8	11	10	0
Access to parks, libraries, other public facilities?	6	6	11	9	0
Access to education about fair housing laws	5	4	9	9	5
Access to school choice?	4	5	9	8	3
Collaboration between agencies	4	3	10	7	8
Other	0	0	0	3	4

The effect of fair housing issues on communities, as seen by survey respondents, is shown in Table IV.58. Those issues have the most significant impact include lack of affordable rental housing, greater share of housing problems for those at lower incomes, concentrations of poverty, and challenges for persons with disabilities.

Table IV.57 Community Issues Salem-Keizer 2019 Fair Housing Survey Data					
Question	**Not at all**	**Slightly**	**Moderately**	**Significantly**	**Don't know**
Do you believe these issues are happening in the City of Salem? If so, how much are the issues impacting your community:					
Lack of affordable rental housing	2	0	3	26	0
Greater share of housing problems for those at lower incomes, of a specific race or ethnicity or national origin, sexual orientation, gender identity, gender expression, disability, gender, or family status.	3	0	4	23	2
Concentrations of Poverty	2	3	5	22	0
Challenges for persons with disabilities?	1	1	6	22	2
Lack of affordable single-family houses	1	1	6	20	3
Differences in access to housing opportunities for people of various incomes, of a specific race or ethnicity, or national origin, sexual orientation, gender identity, gender expression, disability, gender, or family status?	4	2	4	19	3
Lack of diversity and equity in the Salem Keizer School District	2	5	6	13	5
Gentrification and displacement due to economic pressures	4	3	9	12	3
Concentrations of racial or ethnic minorities	2	6	8	11	5
Lack of acceptance of housing choice vouchers	4	1	9	10	8
Segregation	4	5	7	9	3
Lack of housing discrimination enforcement	5	3	4	9	10
No limited education about fair housing laws	5	1	12	6	6
Other	0	0	0	2	3

V. Fair Housing Goals and Priorities

OVERVIEW

Title VIII of the 1968 Civil Rights Act, also known as the Fair Housing Act, protects people from discrimination based on race, color, national origin, religion, sex, familial status, and disability when they are renting or buying a home, getting a mortgage, seeking housing assistance, or engaging in other housing related activities. The Act, and subsequent laws reaffirming its principles, seeks to overcome the legacy of segregation, unequal treatment, and historic lack of access to housing opportunity. There are several statutes, regulations, and executive orders that apply to fair housing, including the Fair Housing Act, the Housing Amendments Act, and the Americans with Disabilities Act.[32]

Affirmatively furthering fair housing is defined in the Fair Housing Act as taking "meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics".[33] Specifically, affirmatively furthering fair housing requires that recipients of federal housing and urban development funds take meaningful actions to address housing disparities, including replacing segregated living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.[34] Furthering fair housing can involve developing affordable housing, removing barriers to affordable housing development in high opportunity areas, investing in neighborhood revitalization, preserving and rehabilitating existing affordable housing units, improving housing access in areas of concentrated poverty, and improving community assets.

ASSESSING FAIR HOUSING

Provisions to affirmatively further fair housing are long-standing components of the U.S. Department of Housing and Urban Development's (HUD's) housing and community development programs. These provisions come from Section 808(e)(5) of the Fair Housing Act, which requires that the Secretary of HUD administer federal housing and urban development programs in a manner that affirmatively furthers fair housing.[35]

In 1994, HUD published a rule consolidating plans for housing and community development programs into a single planning process. This action grouped the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grants (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) programs into the Consolidated Plan for Housing and Community Development, which then created a single application cycle. As a part of the consolidated planning process, and entitlement communities that receive such funds from HUD are required to submit to HUD certification that they are affirmatively furthering fair housing (AFFH).

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[32] https://www.hud.gov/program_offices/fair_housing_equal_opp/fair_housing_and_related_law
[33] § 5.152 Affirmatively Furthering Fair Housing
[34] § 5.152 Affirmatively Furthering Fair Housing
[35] 42 U.S.C.3601 et seq.

In July of 2015, HUD released a new AFFH rule which provided a format, a review process, and content requirements for the newly named "Assessment of Fair Housing", or AFH.[36] The assessment would now include an evaluation of equity, the distribution of community assets, and access to opportunity within the community, particularly as it relates to concentrations of poverty among minority racial and ethnic populations. Areas of opportunity are physical places within communities that provide things one needs to thrive, including quality employment, high performing schools, affordable housing, efficient public transportation, safe streets, essential services, adequate parks, and full-service grocery stores. Areas lacking opportunity, then, have the opposite of these attributes.

The AFH includes measures of segregation and integration, while also providing some historical context about how such concentrations became part of the community's legacy. Together, these considerations were intended to better inform public investment decisions that would lead to amelioration or elimination of segregation, enhance access to opportunity, promote equity, and hence, housing choice. Equitable development requires thinking about equity impacts at the front end, prior to the investment occurring. That thinking involves analysis of economic, demographic, and market data to evaluate current issues for citizens who may have previously been marginalized from the community planning process. All this would be completed by using an on-line Assessment Tool.

However, on January 5, 2018, HUD issued a notice that extended the deadline for submission of an AFH by local government consolidated plan program participants to their next AFH submission date that falls after October 31, 2020.[37] Then, on May 18, 2018, HUD released three notices regarding the AFFH; one eliminated the January 5, 2018, guidance; a second withdrew the on-line Assessment Tool for local government program participants; and, the third noted that the AFFH certification remains in place. HUD went on to say that the AFFH databases and the AFFH Assessment Tool guide would remain available for the AI; and, encouraged jurisdictions to use them, if so desired.

Hence, the AI process involves a thorough examination of a variety of sources related to housing, the fair housing delivery system, housing transactions, locations of public housing authorities, areas having racial and ethnic concentrations of poverty and access to opportunity. The development of an AI also includes public input, and interviews with stakeholders, public meetings to collect input from citizens and interested parties, distribution of draft reports for citizen review, and formal presentations of findings and impediments, along with actions to overcome the identified fair housing issues and impediments.

In accordance with the applicable statutes and regulations governing the Consolidated Plan, Salem-Keizer certifies that they will affirmatively further fair housing, by taking appropriate actions to overcome the effects of any impediments identified in the Analysis of Impediments to Fair Housing Choice and maintaining records that reflect the analysis and actions taken in this regard.

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[36] 80 FR 42271. https://www.federalregister.gov/documents/2015/07/16/2015-17032/affirmatively-furthering-fair-housing
[37] 83 FR 683 (January 5, 2018)

OVERVIEW OF FINDINGS

As a result of detailed demographic, economic, and housing analysis, along with a range of activities designed to foster public involvement and feedback, Salem-Keizer have identified a series of fair housing issues/impediments and other factors that contribute to the creation or persistence of those issues.

Table V.1, on the following page, provides a list of the contributing factors that have been identified as causing these fair housing issues/impediments and prioritizes them according to the following criteria:

1. High: Factors that have a direct and substantial impact on fair housing choice
2. Medium: Factors that have a less direct impact on fair housing choice, or that the Cities have limited authority to mandate change
3. Low: Factors that have a slight or largely indirect impact on fair housing choice, or that the Cities have limited capacity to address

ADDITIONAL FINDINGS

In addition to the table below, there are several significant findings or conclusions summarized here. R/ECAPs are geographic areas that contain at least 50 percent minority, or non-white, population, and at least a 40 percent poverty rate. Salem-Keizer has one (1) R/ECAP.

Black and Hispanic households have somewhat lower access to areas of opportunity, including access to proficient schools, low poverty areas, and labor market engagement.

Hispanic households have a higher incidence of housing problems. Native American and as well as Hispanic households have a higher incidence of mortgage denials in the Cities.

The survey and public input revealed there is a continued need for fair housing outreach and education in Salem-Keizer.

Table V.1
Contributing Factors
Salem-Keizer

Contributing Factors	Priority	Justification
Discriminatory patterns in lending	High	As demonstrated by 2008-2017 HMDA data, American Indian and Hispanic loan denial rates exceeded 21.6 percent and 17.6 percent respectively, compared with 11.5 percent for white households. Denial rates are also higher in areas of Central Salem
Access to proficient schools	Low	School proficiency index is lower for black, Native American, and Hispanic populations than white school proficiency, indicating inequitable access for black households to proficient schools. However, Salem-Keizer has little control over increasing access on a large scale.
Access to low poverty areas	High	Black and Hispanic households have lower access to low poverty areas than white households in Salem-Keizer, as demonstrated by low poverty indices. These areas were primarily found in the central part of Salem.
Access to labor market engagement	Low	Black and Hispanic households have lower access to labor market engagement as indicated by the Access to Opportunity index. However, Salem-Keizer has little control over impacting labor market engagement on a large scale.
Access to public transportation	Low	The Fair Housing Survey indicated that a lack of access to public services has a significantly negative impact on the Salem-Keizer Area. However, Salem-Keizer has little control over increasing access to public transportation on a large scale.
Moderate levels of segregation	Medium	Black and Native Hawaiian households have a moderate level of segregation. However, the Native Hawaiian population represents a small proportion of the population.
Insufficient affordable housing in a range of unit sizes	High	The rate of cost burden in Salem-Keizer exceeds 35.4 percent. This impacts over 25,000 households city-wide. Additionally, those under 30 percent HAMFI face housing problems at a rate of 80.0 percent.
Failure to make reasonable accommodations	High	Failure to make reasonable accommodations is the most common fair housing issue in fair housing complaints with cause in the Salem
Hispanic households tend to have higher rates of housing problems	High	Some 52.6 percent of Hispanic households experienced cost burdens or severe cost burdens in Salem-Keizer, according to CHAS data, compared to the jurisdiction average of 38.7 percent
Lack of fair housing infrastructure	High	The fair housing survey and public input indicated a lack of collaboration among agencies to support fair housing.
Insufficient fair housing education	High	The fair housing survey and public input indicated a lack of knowledge about fair housing and a need for education.

FAIR HOUSING ISSUES, CONTRIBUTING FACTORS, AND PROPOSED ACHIEVEMENTS

Table V.2, on the following page, summarizes the fair housing issues/impediments and contributing factors. It includes metrics and milestones and a timeframe for achievements.

Table V.2
Fair Housing Issues, Contributing Factors, and Recommended Actions
City of Salem

Fair Housing Issues/ Impediments	Contributing Factors	Recommended Action to be Taken
Segregation	Moderate levels of segregation	Review zoning and Comprehensive Plan for potential barriers to affordable housing options, including density maximums and lot size requirements; continue recommending appropriate amendments each year, over the next five (5) years.
Disparities in Access to Opportunity	Access to proficient schools Access to low poverty areas Labor market engagement Access to public transportation	Review opportunities annually to increase funding sources for additional low-income housing in high opportunity areas. Explore opportunities annually for redevelopment or rehabilitation of residential properties in high opportunity areas. Consult with local Transportation Agency, Chariots, to increase access to transportation routes. Review the need to additional routes in low opportunity areas annually.
Disproportionate Housing Needs	Hispanic households tend to have higher rates of cost burdens Insufficient affordable housing in a range of unit sizes Discriminatory patterns in lending	Encourage the development of future affordable housing sites in high opportunity areas annually. Review zoning and Comprehensive Plan for potential barriers to affordable housing options, including density maximums and lot size requirements; continue recommending appropriate amendments each year, over the next five (5) years. Continue investing CPD funds geographically in areas of central Salem to increase access to affordable housing. Rehabilitate 5 owner occupied and 15 renter occupied units annually.
Publicly Supported Housing	Insufficient affordable housing in a range of unit sizes	Locate any future publicly supported housing units in high opportunity areas. Review annually over the next five (5) years. Research opportunities for increased funding options annually.
Disability and Access	Insufficient accessible affordable housing Failure to make reasonable accommodations	Review development standards for accessible housing and inclusionary policies for accessible housing units; continue recommending appropriate amendments each year, over the next five (5) years.
Fair Housing Enforcement and Outreach	Insufficient fair housing education Discriminatory patterns in lending	Promote fair housing education through annual or biannual workshops. Promote outreach and education related to credit for prospective homebuyers annually.

VI. Appendices

A. Additional Plan Data

Race		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
		Table VI.1 — Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant — Salem-Keizer — 2008–2017 HMDA Data											

Race		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
American Indian	Originated	16	10	8	4	11	14	16	29	38	35	181
	Denied	13	7	7	1	1	4	3	2	8	4	50
	Denial Rate	44.8%	41.2%	46.7%	20%	8.3%	22.2%	15.8%	6.5%	17.4%	10.3%	21.6%
Asian	Originated	35	29	40	19	27	49	44	42	44	81	410
	Denied	8	8	3	6	1	11	8	7	12	11	75
	Denial Rate	18.6%	21.6%	7%	24%	3.6%	18.3%	15.4%	14.3%	21.4%	12%	15.5%
Black	Originated	13	8	12	8	6	13	9	32	22	38	161
	Denied	3	5	0	2	0	1	2	2	1	2	18
	Denial Rate	18.8%	38.5%	0%	20%	0%	7.1%	18.2%	5.9%	4.3%	5%	10.1%
Pacific Islander	Originated	8	9	6	10	3	7	7	13	24	25	112
	Denied	4	1	1	3	0	2	3	3	6	3	26
	Denial Rate	33.3%	10%	14.3%	23.1%	0%	22.2%	30%	18.8%	20%	10.7%	18.8%
White	Originated	1369	1289	1030	874	1015	1263	1509	2026	2290	2348	15013
	Denied	324	196	164	128	155	191	157	178	231	218	1942
	Denial Rate	19.1%	13.2%	13.7%	12.8%	13.2%	13.1%	16.4%	8.1%	9.2%	8.5%	11.5%
Not Available	Originated	65	70	66	56	43	80	92	184	192	220	1068
	Denied	24	15	19	9	7	15	18	19	41	23	190
	Denial Rate	27%	17.6%	22.4%	13.8%	14%	15.8%	16.4%	9.4%	17.6%	9.5%	15.1%
Not Applicable	Originated	2	0	0	0	0	2	0	2	5	3	14
	Denied	0	0	0	0	0	0	0	0	1	0	1
	Denial Rate	0%	%	%	%	%	0%	%	0%	16.7%	0%	6.7%
Total	**Originated**	**1,508**	**1,415**	**1,162**	**971**	**1,105**	**1,428**	**1,677**	**2,328**	**2,615**	**2,750**	**16,959**
	Denied	**376**	**232**	**194**	**149**	**164**	**224**	**191**	**211**	**300**	**261**	**2,302**
	Denial Rate	**20%**	**14.1%**	**14.3%**	**13.3%**	**12.9%**	**13.6%**	**10.2%**	**8.3%**	**10.3%**	**8.7%**	**12%**
Hispanic	Originated	139	96	99	76	99	124	140	229	265	277	1544
	Denied	73	23	20	13	32	23	29	37	41	38	329
	Denial Rate	34.4%	19.3%	16.8%	14.6%	24.4%	15.6%	17.2%	13.9%	13.4%	12.1%	17.6%
Non-Hispanic	Originated	1299	1251	1000	849	966	1217	1452	1921	2167	2265	14387
	Denied	278	192	156	131	124	182	145	156	223	205	1792
	Denial Rate	17.6%	13.3%	13.5%	13.4%	11.4%	13%	9.1%	7.5%	9.3%	8.3%	11.1%

Table VI.2
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant
Salem-Keizer
2008–2017 HMDA Data

Denial Reason	American Indian	Asian	Black	Pacific Islander	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	12	18	3	7	395	35	0	470	12
Employment History	0	4	1	0	53	5	0	63	0
Credit History	12	6	4	5	279	35	0	341	12
Collateral	3	3	1	0	208	25	0	240	3
Insufficient Cash	3	5	0	0	70	6	0	84	3
Unverifiable Information	0	7	4	0	70	6	0	87	0
Credit Application Incomplete	3	6	0	3	142	17	0	171	3
Mortgage Insurance Denied	0	0	0	0	7	1	0	8	0
Other	4	7	0	2	167	6	0	186	4
Missing	13	19	5	9	551	54	1	652	292
Total	**50**	**75**	**18**	**26**	**1942**	**190**	**1**	**2302**	**329**
% Missing	26%	25.3%	27.8%	34.6%	28.4%	28.4%	100%	28.3%	88.8%

Table VI.3
Denial Rates by Gender of Applicant
Salem-Keizer
2008–2017 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2008	19.2%	20.6%	35%	0%	20%
2009	13.2%	14.4%	28%	%	14.1%
2010	15.4%	11.4%	21.2%	%	14.3%
2011	14.5%	11.3%	9.7%	%	13.3%
2012	13.7%	10.6%	20.7%	%	12.9%
2013	13.9%	12.4%	17.1%	0%	13.6%
2014	9%	11.9%	15.2%	%	10.2%
2015	8%	8.5%	11.8%	0%	8.3%
2016	9.4%	11.2%	17.6%	0%	10.3%
2017	8.4%	8.8%	11.3%	0%	8.7%
Average	**11.8%**	**11.8%**	**16.8%**	**0%**	**12%**

Table VI.4
Loan Applications by Selected Action Taken by Gender of Applicant
Salem-Keizer
2008–2017 HMDA Data

Gender		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
Male	Originated	1053	885	756	613	729	903	1069	1573	1703	1719	11003
	Denied	251	135	138	104	116	146	106	137	176	158	1467
	Denial Rate	19.2%	13.2%	15.4%	14.5%	13.7%	13.9%	9%	8%	9.4%	8.4%	11.8%
Female	Originated	427	494	380	330	353	460	541	657	795	902	5339
	Denied	111	83	49	42	42	65	73	61	100	87	713
	Denial Rate	20.6%	14.4%	11.4%	11.3%	10.6%	12.4%	11.9%	8.5%	11.2%	8.8%	11.8%
Not Available	Originated	26	36	26	28	23	63	67	97	112	126	604
	Denied	14	14	7	3	6	13	12	13	24	16	122
	Denial Rate	35%	28%	21.2%	9.7%	20.7%	17.1%	15.2%	11.8%	17.6%	11.3%	16.8%
Not Applicable	Originated	2	0	0	0	0	2	0	1	5	3	13
	Denied	0	0	0	0	0	0	0	0	0	0	0
	Denial Rate	0%	%	%	%	%	0%	%	0%	0%	0%	0%
Total	Originated	1,508	1,415	1,162	971	1,105	1,428	1,677	2,328	2,615	2,750	16,959
	Denied	376	232	194	149	164	224	191	211	300	261	2,302
	Denial Rate	20%	14.1%	14.3%	13.3%	12.9%	13.6%	10.2%	8.3%	10.3%	8.7%	12%

Table VI.5
Denial Rates by Income of Applicant
Salem-Keizer
2008–2017 HMDA Data

Income	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
$30,000 or Below	35.8%	26.1%	29.7%	25.2%	27.5%	24.8%	23.8%	20%	27.5%	26.7%	26.6%
$30,001–$50,000	24%	14.1%	12.7%	13.4%	9.5%	12.7%	12%	10.1%	13.3%	11.5%	13.4%
$50,001–$75,000	17.8%	12%	12.8%	12.6%	12.1%	13.1%	8.4%	7.9%	8.9%	7.9%	10.8%
$75,001–$100,000	13.9%	12.2%	11.2%	8.2%	11.5%	9.7%	8.4%	3.7%	6.5%	4.6%	8%
$100,001–$150,000	18.7%	11.6%	8.5%	11.1%	6.3%	12%	7.7%	7%	7.5%	8.2%	9.2%
Above $150,000	14.7%	16.7%	12%	4.2%	13%	14.6%	5.9%	7.2%	10.8%	7.2%	10%
Data Missing	0%	0%	%	0%	%	%	%	0%	0%	0%	0%
Total	20%	14.1%	14.3%	13.3%	12.9%	13.6%	10.2%	8.3%	10.3%	8.7%	12%

Table VI.6
Loan Applications by Income of Applicant: Originated and Denied
Salem-Keizer
2008–2017 HMDA Data

Income		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
$30,000 or Below	Loan Originated	79	105	123	104	132	121	109	124	100	77	1074
	Application Denied	44	37	52	35	50	40	34	31	38	28	389
	Denial Rate	35.8%	26.1%	29.7%	25.2%	27.5%	24.8%	23.8%	20%	27.5%	26.7%	26.6%
$30,001 –$50,000	Loan Originated	398	470	370	318	342	426	425	570	608	576	4503
	Application Denied	126	77	54	49	36	62	58	64	93	75	694
	Denial Rate	24%	14.1%	12.7%	13.4%	9.5%	12.7%	12%	10.1%	13.3%	11.5%	13.4%
$50,001 –$75,000	Loan Originated	507	440	327	264	326	390	491	720	813	845	5123
	Application Denied	110	60	48	38	45	59	45	62	79	72	618
	Denial Rate	17.8%	12%	12.8%	12.6%	12.1%	13.1%	8.4%	7.9%	8.9%	7.9%	10.8%
$75,001 –$100,000	Loan Originated	285	202	150	134	139	234	283	412	489	560	2888
	Application Denied	46	28	19	12	18	25	26	16	34	27	251
	Denial Rate	13.9%	12.2%	11.2%	8.2%	11.5%	9.7%	8.4%	3.7%	6.5%	4.6%	8%
$100,001 –150,000	Loan Originated	157	137	119	104	119	169	241	358	422	469	2295
	Application Denied	36	18	11	13	8	23	20	27	34	42	232
	Denial Rate	18.7%	11.6%	8.5%	11.1%	6.3%	12%	7.7%	7%	7.5%	8.2%	9.2%
Above $150,000	Loan Originated	81	60	73	46	47	88	128	142	182	220	1067
	Application Denied	14	12	10	2	7	15	8	11	22	17	118
	Denial Rate	14.7%	16.7%	12%	4.2%	13%	14.6%	5.9%	7.2%	10.8%	7.2%	10%
Data Missing	Loan Originated	1	1	0	1	0	0	0	2	1	3	9
	Application Denied	0	0	0	0	0	0	0	0	0	0	0
	Denial Rate	0%	0%	%	0%	%	%	%	0%	0%	0%	0%
Total	**Loan Originated**	**1,508**	**1,415**	**1,162**	**971**	**1,105**	**1,428**	**1,677**	**2,328**	**2,615**	**2,750**	**16,959**
	Application Denied	**376**	**232**	**194**	**149**	**164**	**224**	**191**	**211**	**300**	**261**	**2,302**
	Denial Rate	**20%**	**14.1%**	**14.3%**	**13.3%**	**12.9%**	**13.6%**	**10.2%**	**8.3%**	**10.3%**	**8.7%**	**12%**

Table VI.7
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
Salem-Keizer
2008–2017 HMDA Data

Race	$30,000 or Below	$30,001 – $50,000	$50,001 –$75,000	$75,001 –$100,000	$100,001 –$150,000	> $150,000	Data Missing	Average
American Indian	37.5%	26.3%	24%	4.8%	30.8%	0%	%	21.6%
Asian	39.5%	17.5%	11.5%	12.5%	14.1%	11.7%	0%	15.5%
Black	37.5%	16.7%	5.9%	9.1%	5.3%	0%	%	10.1%
Pacific Islander	28.6%	34%	7.3%	12%	0%	40%	%	18.8%
White	25.6%	12.5%	10.4%	7.7%	8.9%	9.4%	0%	11.5%
Not Available	35.1%	17.8%	13.6%	9.9%	10.2%	15%	0%	15.1%
Not Applicable	6.7%	%	%	%	%	%	%	6.7%
Average	**26.6%**	**13.4**	**10.8%**	**8%**	**9.2%**	**10%**	**0%**	**12%**
Hispanic	29.7%	16.5	15.6%	10.5%	14.8%	9.8%	%	17.6%
Non-Hispanic	25.2%	12.5	10.2%	7.6%	8.8%	9.7%	0%	11.1%

Table VI.8
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
Salem-Keizer
2008–2017 HMDA Data

Race		$30,000 or Below	$30,001 – $50,000	$50,001 –$75,000	$75,001 –$100,000	$100,001 –$150,000	> $150,000	Data Missing	Total
American Indian	Loan Originated	10	56	57	40	9	9	0	181
	Application Denied	6	20	18	2	4	0	0	50
	Denial Rate	37.5%	26.3%	24%	4.8%	30.8%	0%	%	21.6%
Asian	Loan Originated	23	85	123	70	55	53	1	410
	Application Denied	15	18	16	10	9	7	0	75
	Denial Rate	39.5%	17.5%	11.5%	12.5%	14.1%	11.75	0%	15.5%
Black	Loan Originated	5	40	64	20	18	14	0	161
	Application Denied	3	8	4	2	1	0	0	18
	Denial Rate	37.5%	16.7%	5.9%	9.1%	5.3%	0%	%	18.8%
Pacific Islander	Loan Originated	5	31	38	22	13	3	0	112
	Application Denied	2	16	3	3	0	2	0	26
	Denial Rate	28.6%	34%	7.3%	12%	0%	40%	%	18.8%
White	Loan Originated	956	4056	4523	2535	2033	903	7	15013
	Application Denied	329	581	527	212	199	94	0	1942
	Denial Rate	25.6%	12.5%	10.4%	7.7%	8.9%	9.4%	0%	11.5%
Not Available	Loan Originated	61	235	318	201	167	85	1	1068
	Application Denied	33	51	50	22	19	15	0	190
	Denial Rate	35.1%	17.8%	13.6%	9.9%	10.2%	15%	0%	15.1%
Not Applicable	Loan Originated	14	0	0	0	0	0	0	14
	Application Denied	1	0	0	0	0	0	0	1
	Denial Rate	6.7%	%	%	%	%	%	%	6.7%
Total	**Loan Originated**	**1074**	**4503**	**5123**	**2888**	**2295**	**1067**	**9**	**16,959**
	Application Denied	**389**	**694**	**618**	**251**	**232**	**118**	**0**	**2,302**
	Denial Rate	**26.6%**	**13.4%**	**10.8%**	**8%**	**9.2%**	**10%**	**0**	**12%**
Hispanic	Loan Originated	211	639	406	153	98	37	0	1544
	Application Denied	89	126	75	18	17	4	0	329
	Denial Rate	29.7%	16.5%	15.6%	10.5%	14.8%	9.8%	%	17.6%
Non-Hispanic	Loan Originated	795	3640	4421	2531	2040	952	8	14387
	Application Denied	268	518	500	207	197	102	0	1792
	Denial Rate	25.2%	12.5%	10.2%	7.6%	8.8%	9.7%	0%	11.1%

Table VI.9
Loans by Loan Purpose by HAL Status
Salem-Keizer
2008–2017 HMDA Data

Loan Purpose		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
Home Purchase	HAL	64	13	1	2	1	1	3	2	3	5	95
	Other	1444	1402	1161	969	1104	1427	1674	2326	2612	2745	16864
	Percent HAL	4.2%	0.9%	0.1%	0.2%	0.1%	0.1%	0.2%	0.1%	0.1%	0.2%	0.6%
Home Improvement	HAL	21	9	2	1	4	2	4	5	4	15	67
	Other	206	119	89	91	102	140	129	217	328	405	1826
	Percent HAL	9.3%	7%	2.2%	1.1%	3.8%	1.4%	3%	2.3%	1.2%	3.6%	0.6%
Refinancing	HAL	219	96	1	11	13	10	4	7	9	8	378
	Other	2167	3737	3269	2371	3525	2599	1033	1644	2282	1842	24469
	Percent HAL	9.2%	2.5%	0%	0.5%	0.4%	0.4%	0.4%	0.4%	0.4%	0.4%	0.6%
Total	**HAL**	**304**	**118**	**4**	**14**	**18**	**13**	**11**	**14**	**16**	**28**	**540**
	Other	**3817**	**5258**	**4519**	**3431**	**4731**	**4166**	**2836**	**4187**	**5222**	**4992**	**43159**
	Percent HAL	**7.4%**	**2.2%**	**0.1%**	**0.4%**	**0.4%**	**0.3%**	**0.4%**	**0.3%**	**0.3%**	**0.6%**	**1.2%**

Table VI.10
HALs Originated by Race of Borrower
Salem-Keizer
2008–2017 HMDA Data

Race	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
American Indian	0	0	0	0	0	0	1	0	0	0	1
Asian	1	0	1	0	0	0	0	0	0	0	2
Black	0	0	0	0	0	0	0	0	0	0	0
Pacific Islander	2	0	0	0	0	0	0	0	0	0	2
White	57	13	0	2	1	1	2	2	3	5	81
Not Available	4	0	0	0	0	0	0	0	0	0	4
Not Applicable	0	0	0	0	0	0	0	0	0	0	0
Total	**64**	**13**	**1**	**2**	**1**	**1**	**3**	**2**	**3**	**5**	**95**
Hispanic	6	2	0	0	0	0	1	0	0	1	1,258
Non-Hispanic	54	11	1	2	1	1	2	2	3	4	12,045

Table VI.11
Rate of HALs Originated by Race/Ethnicity of Borrower
Salem-Keizer
2008–2017 HMDA Data

Race	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Average
American Indian	0%	0%	0%	0%	0%	0%	6.2%	0%	0%	0%	0.7%
Asian	2.9%	0%	2.5%	0%	0%	0%	0%	0%	0%	0%	0.6%
Black	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Pacific Islander	25%	0%	0%	0%	0%	0%	0%	0%	0%	0%	2.3%
White	4.2%	1%	0%	0.2%	0.1%	0.1%	0.1%	0.1%	0.1%	0.2%	0.6%
Not Available	6.2%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0.5%
Not Applicable	0%	%	%	%	%	0%	%	0%	0%	0%	0%
Average	**4.2%**	**0.9%**	**0.1%**	**0.2%**	**0.1%**	**0.1%**	**0.2%**	**0.1%**	**0.1%**	**0.2%**	**0.6%**
Hispanic	4.3%	2.1%	0%	0%	0%	0%	0.7%	0%	0%	0.4%	0.7%
Non-Hispanic	4.2%	0.9%	0.1%	0.2%	0.1%	0.1%	0.1%	0.1%	0.1%	0.2%	0.6%

Table VI.12
Loans by HAL Status by Race/Ethnicity of Borrower
Salem-Keizer
2008–2017 HMDA Data

Race	Loan Type	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
American Indian	HAL	0	0	0	0	0	0	1	0	0	0	1
	Other	16	10	8	4	11	14	15	29	38	35	145
	Percent HAL	0%	0%	0%	0%	0%	0%	6.2%	0%	0%	0%	0.7%
Asian	HAL	1	0	1	0	0	0	0	0	0	0	2
	Other	34	29	39	19	27	49	44	42	44	81	327
	Percent HAL	2.9%	0%	2.5%	0%	0%	0%	0%	0%	0%	0%	0.6%
Black	HAL	0	0	0	0	0	0	0	0	0	0	0
	Other	13	8	12	8	6	13	9	32	22	38	123
	Percent HAL	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Pacific Islander	HAL	2	0	0	0	0	0	0	0	0	0	2
	Other	6	9	6	10	3	7	7	13	24	25	85
	Percent HAL	25%	0%	0%	0%	0%	0%	0%	0%	0%	0%	2.3%
White	HAL	57	13	0	2	1	1	2	2	3	5	81
	Other	1,312	1,276	1,030	872	1,014	1,262	1,507	2,024	2,287	2,343	12,584
	Percent HAL	4.2%	1%	0%	0.2%	0.1%	0.1%	0.1%	0.1%	0.1%	0.2%	0.6%
Not Available	HAL	4	0	0	0	0	0	0	0	0	0	4
	Other	61	70	66	56	43	80	92	184	192	220	123
	Percent HAL	6.2%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0.5%
Not Applicable	HAL	0	0	0	0	0	0	0	0	0	0	0
	Other	2	0	0	0	0	2	0	2	5	3	11
	Percent HAL	0%	%	%	%	%	0%	%	0%	0%	0%	0%
Total	**HAL**	**64**	**13**	**1**	**2**	**1**	**1**	**3**	**2**	**3**	**5**	**95**
	Other	**1444**	**1402**	**1161**	**969**	**1104**	**1427**	**1674**	**2326**	**2612**	**2745**	**16864**
	Percent HAL	**4.2%**	**0.9%**	**0.1%**	**0.2%**	**0.1%**	**0.1%**	**0.2%**	**0.1%**	**0.1%**	**0.2%**	**0.6%**
Hispanic	HAL	6	2	0	0	0	0	1	0	0	1	1,258
	Other	133	94	99	76	99	124	139	229	265	276	9
	Percent HAL	4.3%	2.1%	0%	0%	0%	0%	0.7%	0%	0%	0.4%	0.7%
Non-Hispanic	HAL	54	11	1	2	1	1	2	2	3	4	12,045
	Other	1,245	1,240	999	847	965	1,216	1,450	1,919	2,164	2,261	77
	Percent HAL	4.2%	0.9%	0.1%	0.2%	0.1%	0.1%	0.1%	0.1%	0.1%	0.2%	0.6%

Table VI.13
Rates of HALs by Income of Borrower
Salem-Keizer
2008–2017 HMDA Data

Income	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Average
$30,000 or Below	2.5%	2.9%	0%	0%	0%	0%	0%	0%	0%	0%	0.5%
$30,001–$50,000	4%	0.6%	0%	0.3%	0%	0%	0%	0%	0%	0.3%	0.5%
$50,001–$75,000	4.1%	0.9%	0.3%	0%	0%	0%	0%	0.1%	0%	0.1%	0.6%
$75,001–$100,000	4.9%	1%	0%	0%	0%	0%	0.4%	0%	0.4%	0.2%	0.8%
$100,00–150,000	3.8%	0%	0%	0%	0%	0.6%	0.4%	0%	0.2%	0%	0.5%
Above $150,000	6.2%	1.7%	0%	2.2%	2.1%	0%	0.8%	0.7%	0%	0.5%	1.2%
Data Missing	0%	0%	%	0%	%	%	%	0%	0%	0%	0%
Average	**4.2%**	**0.9%**	**0.1%**	**0.2%**	**0.1%**	**0.1%**	**0.2%**	**0.1%**	**0.1%**	**0.2%**	**0.6%**

Table VI.14
Loans by HAL Status by Income of Borrower
Salem-Keizer
2008–2016 HMDA Data

Income		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
$30,000 or Below	HAL	2	3	0	0	0	0	0	0	0	0	5
	Other	77	102	123	104	132	121	109	124	100	77	992
	Percent HAL	2.5%	2.9%	0%	0%	0%	0%	0%	0%	0%	0%	0.5%
$30,001 –$50,000	HAL	16	3	0	1	0	0	0	0	0	2	20
	Other	382	467	370	317	342	426	425	570	608	574	3,907
	Percent HAL	4%	0.6%	0%	0.3%	0%	0%	0%	0%	0%	0.3%	0.5%
$50,001 –$75,000	HAL	21	4	1	0	0	0	0	1	0	1	27
	Other	486	436	326	264	326	390	491	719	813	844	4,251
	Percent HAL	4.1%	0.9%	0.3%	0%	0%	0%	0%	0.1%	0%	0.1%	0.6%
$75,001 –$100,000	HAL	14	2	0	0	0	0	1	0	2	1	19
	Other	271	200	150	134	139	234	282	412	487	559	2,309
	Percent HAL	4.9%	1%	0%	0%	0%	0%	0.4%	0%	0.4%	0.2%	0.8%
$100,001 –150,000	HAL	6	0	0	0	0	1	1	0	1	0	9
	Other	151	137	119	104	119	168	240	358	421	469	1,817
	Percent HAL	3.8%	0%	0%	0%	0%	0.6%	0.4%	0%	0.2%	0%	0.5%
Above $150,000	HAL	5	1	0	1	1	0	1	1	0	1	10
	Other	76	59	73	45	46	88	127	141	182	219	837
	Percent HAL	6.2%	1.7%	0%	2.2%	2.1%	0%	0.8%	0.7%	0%	0.5%	1.2%
Data Missing	HAL	0	0	0	0	0	0	0	0	0	0	0
	Other	1	1	0	1	0	0	0	2	1	3	9
	Percent HAL	0%	0%	%	0%	%	%	%	0%	0%	0%	0%
Total	**Other**	**64**	**13**	**1**	**2**	**1**	**1**	**3**	**2**	**3**	**5**	**95**
	HAL	**1444**	**1402**	**1161**	**969**	**1104**	**1427**	**1674**	**2326**	**2612**	**2745**	**16864**
	Percent HAL	**4.2%**	**0.9%**	**0.1%**	**0.2%**	**0.1%**	**0.1%**	**0.2%**	**0.1%**	**0.1%**	**0.2%**	**0.6%**

B. Public Input

Fair Housing Forum

Comment: How can we take in the growth rate like for Salem-Keizer it is growing about 8 percent.

Presenter: Population growth rates? The Census has post population estimates that they release every April to go back to July of that year. So, we have those reports, we have that data in the report.

Comment: Do they also include in that data if you are homeless people are not going to be collected.

Presenter: There is one and this is our third stop, but there is one table called a Point-In-Time homeless count. That table is provided by HUD. It is counted every, one day all across the country people go out and do a Point-In-Time homeless count. It is in January, which it is cold in January. The idea is since it is cold, and it is in January you will find a shelter. So, you can go to a shelter and get a more accurate count. In realty what has happened is it is so cold or it is something that you will find a couch or find any means possible to get off the street and so that number is often grossly underestimated, but it is the only actually had statistic on homeless counts in the Consolidated Plan. During our discussions yesterday we talked a lot about how that number was underrepresented and that there was a much higher need for homeless services and for the homeless population than that number indicated.

Comment: So, the groups that are here and if they all volunteered and we went out there and got more data, would the community get more funding?

Presenter: I do not know. That is a great question.

Comment: You know I don't know either. I know that HUD uses a formula, but I am not sure if it a needs-based formula. I think it is more of a case of say for instance Community Development Block Grant we get about 1.2 million every year, for HOME we get approximately $700,000 per year and I know that HOME includes both Salem and Keizer and we get a lesser amount than CDBG and that is just for Salem. So, I don't know if they use population factors outside of.

Presenter: When you present the Consolidated Plan and you the higher number indicates a greater need so when you are prioritizing needs across all sorts of things, infrastructure, improvement, etc. it is better to have a higher number, well it's not better, you want a zero the elderly to address that need, to have that actual data point being higher it would have a better effect addressing that need.

Comment: It is correct though if you look at the Continuum Care for Oregon that Lane County does do more accurate counting than we do for Marion and Polk County. That is why they are considering to separate from the large group. If you have had any conversations from Continuum of Care they are trying to separate Marion and Polk into a region and they might add Yamhill so that we could do a better job at really getting out data and statistics and take care of our constituents better, but Clackamas County does an even better job at counting and taking care of their homeless than Lane County, but those are the two top models to follow for our state and they do a more in-depth tracking during that Point-In-Time and also throughout the entire year. So, they get larger funding.

Comment: The reality is that HUD only accepts the sheltered and unsheltered count and they used to accept the couch surfing and those that were doubled up, but they don't anymore. As you mentioned

several of the agencies that do Point-In-Time counts will include on their survey those who are couch surfing and doubled up and not just sheltered or unsheltered and they use that count to get additional grant funding from other sources.

Presenter: Having a more accurate count is always better.

Comment: I know this is just a basic question, but do you know of any conversation about changing the date to get a better and more accurate? Let's do it in April.

Comment: It is a HUD date and we learned from…

(Crosstalk)

Comment: They are not out there doing the count. Yesterday somebody from Community Action explained to us that they picked January in part because that is when people will seek shelter. So, you may be more likely in a community to get a more accurate count because of the harsh conditions and the weather-related conditions may push people into a shelter verses them being out in the elements and then people not finding them. That was in part why they picked January. It is one of those things, but we also went from a one-day Point-In-Time count to a longer period because a lot of communities are doing more than that one day. It does allow you to. So, this past year Community Action did the entire week. So, I think our numbers went and do you have that number? It is not on the slide, but our numbers increased slightly this year and in part I think it was that and also they did a better job in training us including me, because I don't know where to go and what to do and how to split up. Please volunteer for that of you have not had that experience. I can tell you it is a very humbling experience to be out and finding individuals and for a moment absorb what charter they have that is awesome, because we always hear about the nonpositive pieces of it, but they are resilient, they are in many cases this is a place for them to thrive verses what in our mind this is what home is, but we also take them items. It is a humbling experience. So be on somebody's list to do this to get and it really is a heartfelt time.

Comment: Do you guys also include homeless youth? (Not Discernable) the kids' status is very different and you can have couch surfing.

Presenter: We would love to include the data.

Comment: It is included in the count?

Comment: It is.

(Crosstalk)

Comment: It makes sense to try and have them at the same time.

Comment: It would be interesting if we could share some of that data in the Consolidated Plan and extrapolate it out. I think the school district is a big partner in us making sure we do our programing.

Presenter: If there is data out there, we would love to crunch it, analysis it, and put it in.

(Crosstalk)

Presentation

Comment: Have you received our Community Health Assessment, because we worked on this for collecting data for entire year before we published it and pulled every source of home, housing that we could.

Presenter: I have not, because I…

Comment: I sent a lot of that that I have received and reports and then we set up a share drive. I would have to go back to the share drive to see whether or not it is in there, but I did some dumping of lots of things in there.

Presenter: We will circle back around.

Comment: I think it is on there.

Presenter: Like I said I am the data scientist in the firm, and we have a policy analyst that would have read that if it is already complied data. Then she and she is the project lead on this, and she is writing the report and I am sure she has seen it. If it is on that share drive, I am sure she has seen it.

Comment: If not I will get that in there.

Presentation

Comment: How do you take the survey? Where is it located?

Comment: It is on the same page as the and we set up a special Consolidated Plan page on the City's website and there is a link to the survey on there. We also have paper surveys that we want to share with our partners so that you can help us get as much information as we can from persons who may or may not have experienced a fair housing issues. I know that also the Fair Housing Council of Oregon will also be helping us to reach out to individuals and organizations to get those done, but it is on our website.

Presentation

Comment: How do they do the under six? Do they take that from the OHP…?

Presenter: That would be if you get a survey and it says how many people are in your household and what is their age and you are in poverty and you are have a child that is also in poverty under six. It is all self-reported in this data set.

Comment: So, it is probably really underrepresented because if you think about and I think about the restrictions and how many of those have been returned because the addresses weren't correct. So, you think about that with people living in poverty where they might be couch surfing or …

Presenter: They just don't have time, or they are not in the right space for a giant survey.

Comment: Then the ones without even addresses and is sent to the post office or somewhere else. That is greatly under counted.

Presenter: Yes, I mean they are doing their best, but it is hard to measure real life because real life is messy. This is the best data that we have. There is another slide on the Consolidated Plan, one that shows a different poverty estimate and that and we need to pull that up.

Presentation

Comment: What is the statistic on that year the peak?

Presenter: The peak?

Comment: Yes.

Presenter: What is the number? It looks like 25.

Comment: Then the most current?

Presenter: We are down to about 15.

Presentation

Comment: Do you know who is doing that survey?

Presenter: The SAPI is another Census survey, but it is a different methodology.

Presentation

Comment: It would be interesting to compare those data to WIC programs and countywide and even Children's First Analysis by county and seeing of you can get the poverty statistics for there.

Presenter: The more data the better.

Comment: When you do your free and reduced lunch that is based upon poverty data as well.

Comment: We just had a conversation about that this morning. That is also and we know that not completely accurate, because a parent don't feel comfortable. Some are scared to report, but the nice thing that ODE does for community eligibility proficient so far schools determined that they can be schoolwide, free or reduced lunch. There is a multiplier, so they really make the assumption that they know that they are not getting the accurate count. So, they multiply it by 1.6 to give us a greater, but it is still not accurate.

Presenter: It is a tough thing to measure especially if you have to self-identify. It is a hard thing to do.

Presentation

Comment: You said 40 percent?

Presenter: Yes, 40 percent of this number are other vacant. They are ghost houses.

Comment: Can you give an example. That is a lot of …

Comment: If you have a house on the coast and you have a house here.

Presenter: That would be for seasonal recreation use. That would not...

Comment: So, it is not in the vacant?

Presenter: Yes, if it is sitting at the coast and it is for seasonable and for fun and recreational use that is not in that category. Other vacant is it not on the market. It is either foreclosed and it is just going

through the foreclosure process or someone bought it to flip it in a year or two or they want to rehab it or it is just people moved away and it is just sitting there and they pay the taxes and they don't have money to take it down. They don't know what to do with it. Maybe it has been in the family a long time. It is a big number and yesterday we spent a long time talking about that and how to evaluate and fix that number or see how we can benefit our current situation.

Comment: Would that also be like because in Marion County we have a lot of the elderly that went into assisted living facilities and they don't have anybody...

Presenter: That would be the same thing. It is just they are sitting there.

Comment: Does anybody know anybody who has completed a vacant unit count or who does that as part of does...

Comment: We tried to do something like that with the Community Health Assessment a statistic for vacancy that people could actually move in was only like 2 or 3 percent that were empty. Housing Services, they bought data from some source and I know they would be able to tell you. I know city by city they were trying to do that. So, whoever was doing the recoding for this might have some of that data too, but those are the two people I can think who are doing it off the top of my head. I know United Way is also doing a Housing Analysis right now with their housing plan of building 3,000 units.

Comment: So, we have a Housing Analysis and we have a vacant or available land use that the city does, and the City of Keizer just completed theirs.

Comment: We had an intern over the summer that was looking at Marion, Polk, and Yamhill Counties and seeing a need with land availability to match up and find places that we would be able to build the housing that would actually be used.

Presenter: Yesterday, we were talking about land banking. Some cities have found that if they contact these people that own these other units and say we understand that you can't pay to take care of them, but if you sign over, we will take them down. This is a five-year process and so maybe you do that in year 2 or 3 and then next consolidated planning process you have land banked and then you can go ahead and develop that land. It might be a ten-year strategy instead of a five. It is another thing to think about.

Presentation

Comment: So, for the Native Hawaiians did you say separate out Pacific Islanders?

Presenter: That is in there too and this is probably just a very small sample size. It is probably just a small sample size which is probably why it is looking so big.

Comment: Most of the Native Hawaiian population in Salem-Keizer that is mostly homeless Micronesian.

Presenter: That is just Native Hawaiian, and this isn't homeless, this is just where in the Census tract data. So, it is hard to get your head around. It is based on the small number of jurisdiction and it is just comparing that jurisdiction that average as a whole even if you go smaller it might be totally segregated.

Presentation

Comment: Can you tell us where that is?

Comment: Salem

 Parkway and Portland that triangle.

(Crosstalk)

Comment: We know that is Mentor Island…and this looks like I am looking for the Oregon State Correctional facility. So, this is way out by Corbet. It has a number, so it is a state road. 99 West maybe?

Comment: I am pretty sure that is Salem Parkway.

(Crosstalk)

Comment: Portland Road…they are the same?

Comment: Portland Road turns into 99.

Comment: This is 99. This is a state road.

Comment: Salem Parkway is different.

Comment: Right, it is going to be more over here, would it not be.

Community: Is that Edgewater?

(Crosstalk)

(Map Discussion)

Comment: What racial compositions…

Presenter: This is non-white, so anyone who is nonwhite. That is how they calculate it.

Comment: Would you say primarily Hispanic families have children there?

Comment: That would be a high concentration area yes, but there will be other races too.

Comment: But primarily…

Comment: Highland goes to Parish…

Comment: So, they probably mostly go to or it could be, and the boundaries have changes and I don't have all of the new boundary changes memorized yet.

(Crosstalk)

Comment: My friend teaches there, and they have a high level on non-English speakers and high Micronesian community, and they have high Hispanic and they do have impoverished Caucasians and they have everyone you could think of.

Comment: That is what I am saying, it is a combination.

Comment: … Title one and they get the federal funds.

Presenter: That Limited English Proficiency the LEP is in the AFH dataset that we generate. We get counts of national origin and Limited English Proficiency for that.

Presentation

Comment: It is the only state capital in the country that does not have Saturday service.

Presenter: … of 60.

Presentation

Comment: My question is if we have to use the HUD data how we as a community say that is not really accurate. We know the transportation is not that great and I am not downing them or anybody it is just the reality is there is some work to be done and there are some challenges that need to overcome. I just look at this and we don't feel this is representative. That is when we need you guys to say that this is not representative so that we can be able to do programing activities based upon the reality and not based upon datasets that we don't even know the backend of where they came from.

Comment: It would be interesting to pull the CCO data. I know they did a good cost for how much was used for medical care transportation; 50 percent is used for medical transportation. So, you could get the data here from the CCO or even like get it from or however they get logistic care counts and that could be really important data.

Presenter: To actually see…

Presentation

Comment: What about jobs, because how, many people are commuting more than 30 minutes? That would tell us more.

Presenter: I think we put that and when I mentioned appendices, I think we have commute travel times in the appendices. We do that as a standard data build. Not only commute times, but average commute time and in or out of county. We do have that information.

Comment: Can I just do a time check. We are after 10:30, how much longer do you think?

Presenter: I am here so it is up to you guys.

Comment: How much more do you have?

Presenter: I have ten more eleven more slides.

Presentation

Comment: Native Americans have the highest rate of denial.

Presenter: Yes, 21.6 percent.

(Crosstalk)

Presentation

Comment: School district boundary. That is when we had that conversation.

Presentation

Comment: Is the RCAP/ECAP is that map just for Salem or also Keizer?

Presenter: That was Salem-Keizer.

Comment: So, there is no RCAP/ECAP in Keizer?

Presenter: Wherever that one was in Salem. So technically yes.

Comment: Just so you know that means we have to address what is happening in that area, which means the City when we do our Annual Action Plan which will be the back part of this analysis we will be stating that this is our R/ECAP and we expect that there will be some programmatic effort to address that in that community.

Presentation

Comment: So, the population that I am most concerned about addressing in this conversation today is the population that we support and those are people that experience intelligential and mental disabilities that receive services that are through state and federal programs. We cannot obtain rentals because we are termed group homes. So, the money we have a conversation with a landlord about the fact that there is going to be several adults living in this home and they won't even consider your application. So, then we are bordered with only having to own these properties and the programs do not support real estate. The rent rate you are able to charge to the Social Security Administration income that these people receive is meniscal. So that is why we come to try and maintain our properties through these programs, but if we were to address this at a different perspective and I can tell you because Fairview was one of the largest institutions in the state that closed in the 1990s for the people that were supported with these disabilities, we have a huge population in this community. We are good at doing it, so if we are able to combine housing for these individuals to live in these neighborhoods and be a part of their communities, I think we are going to help mitigate some of that issue right there.

Presenter: That is a great comment. Thank you.

Comment: One population that is just a Salem issue, but a regional issue (Not Discernable) mothers tend to make less money period so getting them housed and if they have children it is really difficult. The other group that tends to have a lot of barriers and of course we talked about individuals that have disabilities but also veteran disabilities, but other groups that have a lot of barriers are people with any criminal record or substance use disorders. There have been a lot of people denied even in shelters for medical treatment, MAT, they are harder to even get into Oxford Houses. They do have the prison and those people are released are really struggling to get houses or services. Those men or women who have some criminal record who were in the State Penitentiary who were released do have a lot of barriers and even case workers are struggling to get them without feeling hopeless or doing something to go back to jail. So that is a big group that needs to be paid attention to besides the substance abuse disorders and then I think it is always important to highlight Micronesians and Native Americans kids, because if you look at a health assessment as a whole for Marion and Polk County

those two groups have the highest rate of not having enough to eat and that is indicator of burden of income. So, you will see where there is high level Micronesians there might be ten people in a house and in like a two-bedroom house.

Presenter: That is overcrowding.

Comment: Overcrowding or houses that are not up to date. Those groups Pacific Islanders and Native Americans all tend to have those kind of homeless issues and make them not classified as homeless, but multigenerational houses and overcrowding. So, that is a whole other issue to…

Presenter: Overcrowding is technically one of the four housing problems defined by HUD. So that will be useful in the Consolidated Plan. You can actually address that as a housing need under those guidelines.

Comment: You will see the overcrowding with the Hispanics, but in particular with Native Americans and Micronesians you see a lot of it.

Comment: I did hear how we can overcome some of these barriers.

Comment: With Micronesians groups there is no staff hired where they speak their language. So that is a problem with medical, housing services, etc. The language line is not always quick and efficient so making sure that we are hiring bilingual staff and in places like the schools and housing, apartments. That is something that we never really talk about and am in desperate need and particularly in focusing on Vietnamese and Russia and Micronesians. We need to do something better.

Presenter: That is a definable barrier.

(Crosstalk)

Comment: Affordable housing and truly not to be terribly reductive the root cause of much of this is there is simply not enough housing to go around. We have to build more affordable great. Honestly and perfectly happy if we just built more of anything to simply move people along into housing, because as historically as people's incomes have increased, they would move into bigger houses. They would move into better houses and those houses were then taken by people who would move up the economic ladder. The ladder isn't even there. People get into a place and they are not going anywhere. The rate of how many people move is dramatically lower than it has even been in modern times. We simply don't have enough housing to meet all of the various needs of all of the various communities that we are serving. So, what can we do to eliminate barriers? We have to make it easier in general to build housing of all kinds within the City of Salem and the City of Keizer. We have to really get back to the root of this and simply create more spaces for people to be.

Comment: Yesterday we had developers and some of the non-profit developers in the room and they were very clear that the numbers just don't pencil for them right now. That when they go to do the numbers it just not in a quantity like for instance to give you an example, Cornerstone, because everybody is familiar with it on Portland Road. Thirty million dollars, $30 million dollars and they have 40-year responsibility to maintain that. So, the backend is what scares a lot of developers on the private end of wanting to be involved. They don't want to tie themselves to a 40-year commitment. I am not saying it shouldn't be there, I am just saying these were some of the conversations that we

have been having both with the city and through our Salem process as well as through this process , but we are trying to figure out also and we were under subscribed for both CDBG and HOME this year. So we had money that money that people did not make an application to use and so that is a sign saying there is a breakdown somewhere between how do we get developers and I have had developers that tell me I will never do the HOME through HUD program. They are just too many boxes to check when I can get money from OHCS and have very few boxes to check.

Comment: I would say that is something that we are struggling with the way United Way is trying to go about building houses we don't meet and we don't fall in to those boxes or the code doesn't allow us to do what we would like to do in a way that is affordable that is a market driven solution that is able to be replicated. So, having those conversations around we need more housing, but we are being held up.

Presenter: Do you have any specific examples of the code off the top of your head?

Comment: I can give you one.

(Crosstalk)

Comment: One of the parsons of land that United Way was looking at to do some affordable housing was in the airport zone. You can't build there because it will not pass the environmental review or you can't build there because there is a potential, but the airport is going to expand and why put somebody in there because you know you are going to have to relocate which is a cost. That is just an example.

Comment: That and the whole thing with the house bill allowing (Crosstalk)

Presenter: Increase density.

Comment: So that was really helpful for us.

Comment: This is a little side as an example, Salem Hospital was involved with a project across form Fisher Road. To do medical respite with the other short term/transitional housing. I was in a meeting with Salem Housing Authority and all the partners we were working with and it was all going well. As well as it can do, but they were talking about how we had all the rooms and these are simple rooms with small mini kitchens and they had a major kitchen downstairs to share, but they all had to be fitted for a stove, which was never going to be put in, but that was a HUD requirement.

Presenter: It is lacking complete kitchen facilities is a housing problem.

Comment: So, and me being the practical person who doesn't spend all my time in this space and me head is like why? So, the cost of putting all of that into building this just jacks up the price on things and then they take them all out, because there is a fire hazard, people were drying their socks and all of the things that happen. It wasn't the point of this facility and there was access to a full kitchen, but because of the rules from the Federal Government to get the access to money they did it. That is just one tiny thing and we could probably spend all day talking about multiple layers about how government gets engaged in trying to help people, but actually makes it harder. If there was a fast track to fix some of those things sign me up.

Comment: The cost associated with those are astronomical unrelated to the City of Salem and Keizer we are doing what was supposed to be a $600,000 rehab on 86 apartments that were for affordable housing for seniors it is costing us $12 million dollars to do. Not a lot of that is going to the tenants. It is going to all this bureaucracy and red tape. I did a Phase One Assessment, it is an environmental assessment four time, because the lenders and every lender is different, they all require it. The cost to provide affordable housing is prohibitive in building more affordable housing.

Presenter: You, at least in theory, bureaucratic red tape is easy thing to cut. You can't build more land, but that is in theory.

Comment: Part of that is because the economic environment itself. Just to hire a contractors there is just not enough for the demand out there and they are getting astronomical prices. One of our members needed to add a wheelchair ramp to one of their buildings. Eighteen months ago they got a bid for $9,000 and for whatever reason they could not afford to do it at that time. Their most recent bid which they had to finally do earlier this year, $60,000 in 18 months.

(Crosstalk)

Comment: Not building new schools. It is expanding what we have because it is more affordable.

Comment: On another note on the private side I am involved with a problem with the tiny housie. They fall in between manufactured house and mobile home/ regular home. So, all of this conversation around who license them? Do they get titled and to get financing to build a home and so the legislature finial did I pass some clarity for whatever reason they did not put an emergency clause on which means it doesn't take place until January, which now DMV is not willing to start which is in January. So, you have an industry that is on hold and you can't get anyone to lend you money to build a tiny house or buy a tiny house. So, it is just on gores on and on and on. So, you would think and I am a problem solver by nature and do you need to deal with different things. I am so frustrated, and I want to try and resolve these things. So, this is how the conversation, but I have another meeting so I have to run.

(Crosstalk)

Comment: Like go to Northwest Senior Service Disability clients or WIC clients for like the actual communities where they can have a voice in what is the barriers for them.

Comment: This is part of and this overall let's get this big picture out to providers and then it is incumbent upon me which I say to everybody I am happy to come to meet any of your clients at your place and figure out what is going on. At the end of the day we are trying to figure out how to spend the resources and I want those individuals who have gone through the process and we were at Cornerstone last night talking with their clients about they are houses now. They are in a good space in relation to what the process was and last night the number one thing they told us was that we do not have one stop shopping. They were very clear that they went over to the Housing Authority again and not against the Housing Authority it is just the way the systems are set up right now. They were told that we really can't do anything with you until you go ARCHES. So, then they leave the Housing Authority and get over to ARCHES and maybe we can see you today and maybe we can't. The hours are different, the times and you just never know. Then you go to there and today after this you just may need to go to Catholic Communities Services for this support today. So, then you find Catholic

Community Services and you go there, and they say maybe today you get this and then you go over there to get this. They were pretty specific on how many places they had to go. They were not complaining. What they were trying to say was because I had a vehicle, number 1 and I had some source of income and I could put gas in that vehicle and because I was persistent. She was very clear and because of my persistence I was able to begin to go from place to place and navigate. She said however I am living in my car so that is my home and I am taking my home with me. I also have previous employment and organizational skills so I would document everything they told me what to expect so when I got there, I was able to give the person who I spoke with , who sent me, and what they said they had. She was just totally awesome in telling us the system that is set up now is broken. If we have to go through all of that we also talked about Community Connections. She said it was such a relief to have everybody in the same room. So, I can go from here to here to here. She said unless you have someplace where you are able and it may take more than one place, because we have people in different communities, but if you look at where that high area is, there is no central service located in that community. So, if you are not coming down once again to ARCHES or the Housing Authority. So that was a very telling part. There were some other comments that she took us from A to Z. We are trying to get that type of input and what the barriers were as well as solutions. Her solution was you have got to have it where people don't go from and she said if we go to and even the food banks, this one is open on this day at this time and this one is open on this day at this time. There is no consistency as to when they are open. So, if they don't have what you need, and you need to go to the other you may have to wait three days before they are open. They were very clear last night and how appreciative number one on how they were every organization that they communicated with that they are not friendly. At least somebody says once again those customers so us that use our services saying, 211 is not the answer, bottom line. So, we need paper, so we had a conversation about why the paper was not being used in regard to such a change and turnover in regard to services and hours and days. So, they understood that, but we have to come up with something. This is not working, but that was last night.

Comment: I forgot that we tend to overlook the 16 to 25 years old. They are struggling to get a house through every service they can think of. They are not emancipated, they can't get the help, it fills up really quickly. So, it is a really important group to …

Comment: I would lower that below 16. I run the youth shelter in town and I served 41 minors in the last 18 months with a variety of different factors, but where we are seeing the biggest need right now is in transitional housing for the 15 to 18 year old really and definitely the 18 to 24 year old as well, but that is a different agency that focuses on that group. So I can only speak for the minors, we have had a handful of those youth who are and they have a job and they are self-sustaining, but they can't get a place because they are 16 or 17. So looking at other housing opportunities for that older youth, young adult age group is really big and also you spoke to it a lot too but I really encourage us to look at cultural aspects of homelessness. That is something that is blowing our minds. That is a big factor. So, going to these different groups and asking them. I was going to ask you what the definition of overcrowding for HUD was, and if there is and what kind of housing are, they are looking for culturally. Do they want to split up? Are we going to create housing that is not culturally specific to them or is of interest to them? So, what does that housing structure look like and really getting that input is really important.

Comment: I agree.

Comment: I will fill out the survey and I will sing my song for the minors. It has been disappointing how much the city has not invested in that population. We have one of the highest homeless rates for youth in the country. Over 1,000 homeless students in Salem/Keizer school district alone and we are not getting any city funding.

Comment: It wasn't sufficient.

Comment: I would caution creating instability in funding. I love the idea of focusing on different populations, but I would suggest making that more of an even thing. If you, for example for youth, if you made that a focus, we are going to get money, get programs are going to get money and it is not sustainable. So next year they are going the fire the staff that they or shut down the program that they just started because the focus and the trend is on a different population. If there is a way to structure the funding to where you had it designated every year for different populations, so you knew who and no matter what X amount of dollars was going to be focused on homelessness and X amount of dollars was going to be focused on adults with disabilities. So, you are creating sustainability for those programs, because a flash in the pan isn't going to do…

Comment: Is it sustainable if we don't know from year to year what we are going to get? That is part of our struggle and is that if you are dependent on the funding resources this is really not the place, because we don't know from year to year what we are going to get and of the 1.2 million HUD restricts supportive services for staff and case management to only 15 percent. The rest is supposed to go into the housing construction or the infrastructure in the community and I have had a conversation and I know we need crosswalks, but if you don't have a house you are not going to need a crosswalk or we need city parks, but the reality is I don't need a park if my child does not have other than a place for me to set up my tent. That is not allowed. I should have said, and the majority of the money is focused on and you are talking about maybe $222,000 for supportive services and that is all you can spend.

Comment: I would just encourage looking back historically how has that money been spent and what is the majority of that funding going towards and is it split up equability around the highest need's populations. Again, look at who gets the money. Youth homelessness hasn't been funded in multiple years in a row because other populations that are consistently getting funding and high levels of funding.

Comment: I agree with you. So what you are suggesting and what I think is an excellent suggestion open for conversation by anybody, but I am throwing this out, persons who have substance abuse we will allocate and I am just throwing this number out $70,000 and so all of those persons who work with families that have substance abuse challenges they would be fine for the 70 and then you would break it down to I get…

Comment: Because of all of the high need populations are…

Comment: You guys are funding and are you going to be allowing because they do it with LIHTC and allow purchase and rehab if it is not for profit to start a program for youth?

 (Crosstalk)

Comment: I love the tiny homes, but I just think it is about the land.

Comment: It is the land. What we like about the domes is we can do those and also a fourplex and to focus on a bigger one actually houses many households, but the tiny homes with 300 square feet, that is just not enough.

(Crosstalk)

Fair Housing Assessment
GUEST ATTENDANCE/SIGN IN LOG
NMSDS – 9:30 a.m.

Meeting: Consolidated Plan 2020-2024
Date: 8/22/2019

	Name (please print)	Organization	E-mail (please print)	✓ To receive future information
1	Sara Goetze	United Way	sgoetze@unitedwaymwv.org	✓
2	Christyn Prantl	IS Living	cprantl@isliving.org	✓
3	Stef Jackson	IS Living	sjackson@isliving.org	✓
4	Jeff Sargent	CARD	jsargent@caporeason.org	✓
5	Wendy Roberts	SalemKeizer SD	roberts_wendy@salkeiz.k12.or.us	✓
6	Denyc Boles	Salem Health	denyc.boles@salemhealth.org	✓
7	Jill Tucker	St. Francis Shelter	jill@stfssalem.org	✓
8	Tricia Ratliff	MWVCAA – HYRC	TRICIA.RATLIFF@mwvcaa.org	X
9	Rebecca Knight	Polk County PH	knight.rebecca@co.polk.or.us	✓
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The City of Salem values all persons without regard to race, color, religion, national origin, sex, age, marital status, domestic partnership, disability, familial status, sexual orientation, gender identity and source of income. In order to ensure the broadest range of services to individuals with disabilities, the City of Salem will be pleased to make necessary arrangements. To request services please call either number listed below at least two working days (48 hours) in advance. Urban Development Dept.: 503-588-6178; or Text Telephone: 503.588.6370.   Si necesita ayuda para comprender esta información, por favor llame 503-588-6314

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