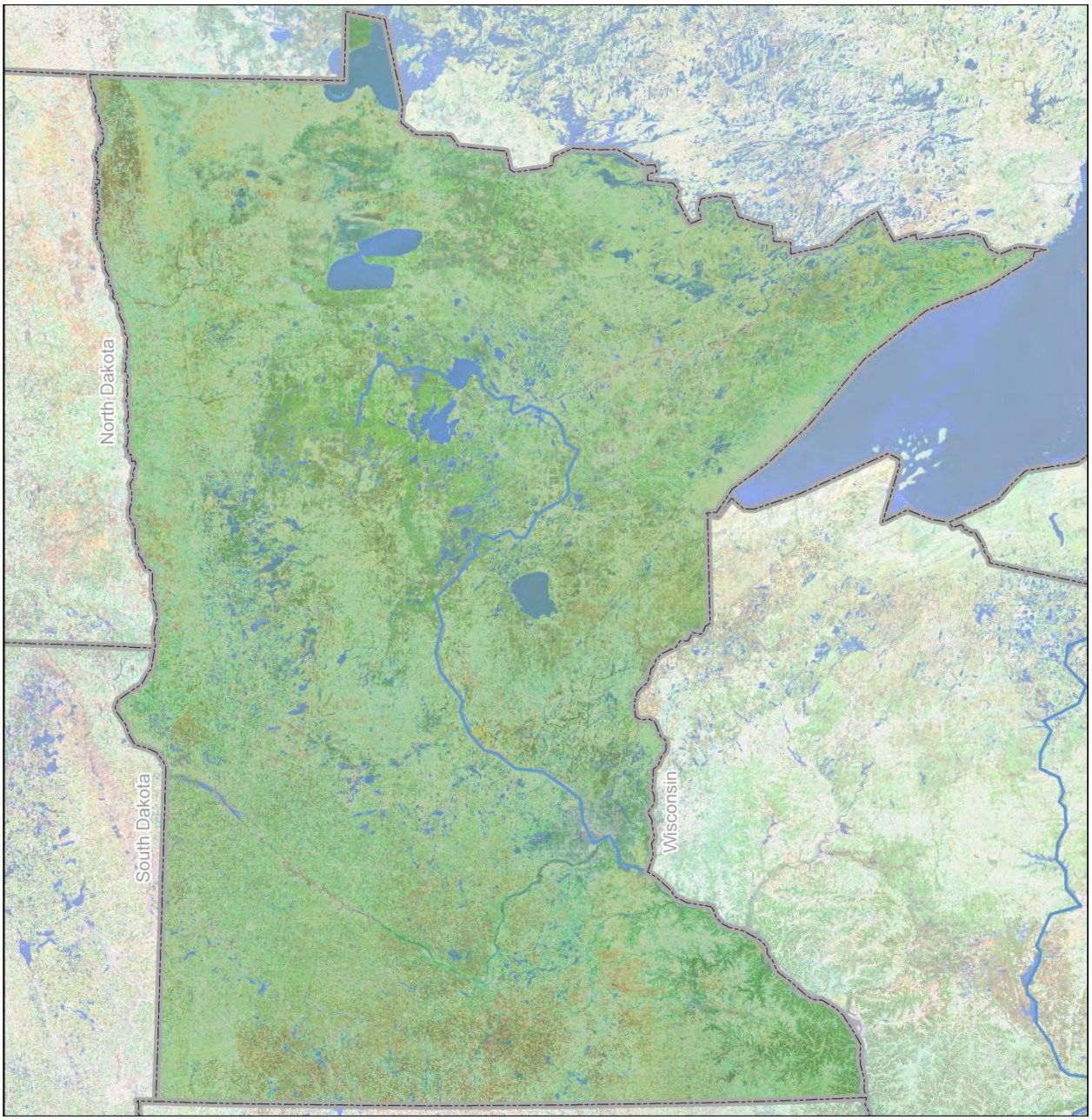
2011 MINNESOTA ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

FOR PLAN YEARS 2012 – 2016



2011 MINNESOTA ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

FOR PLAN YEARS 2012 – 2016

October 3, 2012

Prepared for
The State of Minnesota:
Department of Employment and Economic Development,
Housing Finance Agency, and
Department of Human Services

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EXECUTIVE SUMMARY

AI PURPOSE AND PROCESS

In exchange for federal funds, entitlement jurisdictions are required to submit certification of affirmatively furthering fair housing to the U.S. Department of Housing and Urban Development (HUD). This certification has three elements:

1. Complete an Analysis of Impediments to Fair Housing Choice (AI),
2. Take actions to overcome the effects of any impediments identified, and
3. Maintain records reflecting the actions taken in response to the analysis.

In the *Fair Housing Planning Guide*, page 2-8, HUD provides a definition of impediments to fair housing choice as:

- "Any actions, omissions or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices [and]
- Any actions, omissions or decisions that have this *effect*."[1]

The list of protected classes included in the above definition is drawn from the federal Fair Housing Act, which was first enacted in 1968. However, state and local governments may enact fair housing laws that extend protection to other groups, and the AI is expected to address housing choice for these additional protected classes as well.

The AI process involves a thorough examination of a variety of sources related to housing, affirmatively furthering fair housing, the fair housing delivery system, and housing transactions, particularly for persons who are protected under fair housing law.

The development of an AI also includes public input and review via direct contact 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 impediments.

METHODOLOGY

As part of the consolidated planning process and as a requirement for receiving HUD formula grant funding, this AI was sponsored by the Minnesota Department of Employment and Economic Development (DEED), the Minnesota Housing Finance Agency (Minnesota

[1] http://www.hud.gov/offices/cpd/about/conplan/fairhousingexs/Module5_TopSevenAFFH.pdf

Housing), and the Minnesota Department of Human Services (DHS), all of which evaluated impediments to fair housing choice within the State of Minnesota.

Within Minnesota, fair housing law is covered by the federal Fair Housing Act, which includes protections based on race, color, religion, national origin, sex, disability, and familial status, and the Minnesota Human Rights Act, which extends additional protections based on creed, sexual or affectional orientation, marital status, and receipt of public assistance. Further, the following cities hold separate fair housing ordinances in addition to the federal and state protections:

- The City of Duluth offers the additional protection of age,
- The Minneapolis Civil Rights Act includes the protection of ancestry, and
- The City of St. Paul offers protections based on ancestry and age.

As such, fair housing choice in this AI for the State of Minnesota was evaluated in relation to this list of protected classes.

The purpose of this report is to update the previous statewide AI by determining current impediments to fair housing choice at work in Minnesota and to suggest actions that the State can consider in order to overcome the newly identified impediments. Thus, this report represents only the first element in the certification process presented on the previous page.

This AI was conducted through the assessment of a number of quantitative and qualitative sources. Quantitative sources used for analysis of fair housing choice in Minnesota included:

- Socio-economic and housing data from the U.S. Census Bureau,
- Employment data from the U.S. Bureau of Labor Statistics,
- Economic data from the U.S. Bureau of Economic Analysis,
- Investment data from the Community Reinvestment Act,
- Home purchase data from the Home Mortgage Disclosure Act, and
- Housing complaint data from HUD and the Minnesota Department of Human Rights.

Qualitative research included evaluation of relevant existing fair housing research regarding the State of Minnesota as well as fair housing law cases relevant to the state. Additionally, qualitative research was involved in the evaluation of information gathered from several public input opportunities conducted in relation to this AI, including:

- A fair housing survey of 562 stakeholders throughout the state to investigate fair housing issues in the private and public sectors;
- A series of three focus groups with housing and community development stakeholders to identify possible barriers to fair housing choice; and
- Five regional forums held in several locations around the state to allow public input and reaction to preliminary findings of the AI.

Research conclusions were drawn from these sources and further evaluated based on HUD's definition of impediments to fair housing choice, as presented on the previous page. Ultimately, a list of impediments to fair housing choice in existence within Minnesota was identified, along with actions to consider for implementation to overcome or ameliorate the identified impediments.

OVERVIEW OF FINDINGS

Socio-Economic Context

According to the Census Bureau, between 2000 and 2010, the population in the State of Minnesota grew from 4.9 million to 5.3 million persons, or by 7.8 percent. Data for population by age showed that the state's population slowly shifted to comprise more persons over the age of 55, although the age groups with the largest populations comprised persons aged 5 to 19 and 35 to 54.

Census Bureau data showed that, since 2000, the racial and ethnic composition of the state has also undergone some change. While the white population increased by only 2.8 percent between 2000 and 2010, most other racial and ethnic minorities showed double-digit increases in population change. In fact, black, Asian, and Hispanic groups all showed percent increases of more than 50 percent. Further evaluation of black, Asian, American Indian, and Hispanic population data in geographic terms showed slight to moderate increases in concentration of these groups over the past decade in census tracts throughout the state. As of 2000, other groups, including disabled persons, were also slightly concentrated in some areas of the state such as in the tribal lands and in the Twin Cities metro region.

Economic data for the State of Minnesota demonstrated the impact of the recent recession. Data from the Bureau of Labor Statistics showed that the labor force, defined as persons either working or looking for work, increased from around 2.8 million persons in 2000 to nearly 3 million in 2010. However, recently, employment figures have declined and, as a result, the unemployment rate increased to 7.3 percent by 2010 but stayed well below the 9.6 national rate seen at that time. Data from the Bureau of Economic Analysis showed that average earnings per job in the state decreased in 2009 and remained below national figures. In Minnesota, the poverty rate average for 2005 through 2009 was 10 percent, with 506,233 persons considered to be living in poverty. This group was concentrated primarily in the tribal lands in the state as well as in and around Minneapolis.

The number of housing units in the state increased by 13.6 percent, or from 2.1 million to 2.3 million units, between 2000 and 2010, with the majority of the housing stock built in 1939 or earlier. The number of building permits issued decreased since 2004, but the value of permitted single-family units showed an all-time high in 2010. Of the 2.1 million housing units reported in the state in the 2000 census, more than 70 percent were single-family units, and more recent data from the Census Bureau showed that this percentage increased to nearly 75 percent. In the most recent census, 88.9 percent of units were occupied, and, of these, 73 percent were owner-occupied and 27 percent were renter-occupied. Of the 170,819 unoccupied housing units counted in Minnesota in 2000, 16,074 were noted to be "other vacant" units, which are defined as units not available to the marketplace and can

contribute to blighting influences. Census data from 2010 showed that this type of unit increased by nearly 155 percent, to 40,922 units.

At the time of the 2000 census, 1.6 percent of households were overcrowded and another 1.3 percent of households were severely overcrowded; this housing problem was more common in renter households than in owner households. In Minnesota, in 2000, 1.7 and 1.6 percent of all households were lacking complete plumbing or kitchen facilities, respectively. However, the number of incomplete facilities had not significantly changed in more recent data. Additionally, in 2000, 14.2 percent of households had a cost burden and 7.9 percent of households had a severe cost burden, and the 2009 American Community Survey (ACS) data showed that both of these percentages have increased since that time.

Review of Fair Housing Laws, Studies, and Cases

A review of laws, studies, cases, and related materials relevant to fair housing in the State of Minnesota demonstrated the complexity of the fair housing landscape. It was determined that state law and several local ordinances offer protections beyond the scope of the federal Fair Housing Act. Examination of these conditions revealed issues of discrimination in the rental markets, including refusal to rent and harassment, potentially unfair lending practices in the home purchase markets, resistance to development of group housing, and unbalanced enforcement of housing codes.

Fair Housing Structure

In Minnesota, several organizations provide fair housing services, including outreach and education, complaint intake, and testing and enforcement activities for both providers and consumers of housing. These organizations include a HUD field office, the Minnesota DHR, the Duluth Human Rights Department, the Minneapolis Department of Civil Rights, and the St. Paul Human Rights Division. A number of other organizations also contribute to affirmatively furthering fair housing through legal advocacy or other services, such as the Legal Aid Society of Minneapolis and Legal Aid Services of Northeastern Minnesota.

Fair Housing in the Private Sector

Evaluation of the private housing sector included review of home purchase lending information and predatory lending practices, fair housing complaint data, online rental advertisements, and results from the private sector part of the fair housing survey, and the size, frequency, and location of business loans.

Home Mortgage Disclosure Act (HMDA) data were used to analyze differences in denial rates in the State of Minnesota by race, ethnicity, sex, income, and census tract. Evaluated home purchase loan applications from 2004 through 2009 showed that there were 468,180 loan originations and more than 83,354 loan denials, for an average six-year loan denial rate

of 15.1 percent. Denial rates fell from 17.6 percent in 2006 to 11.6 percent in 2009. These HMDA data also showed that black, American Indian, and Hispanic applicants experienced significantly higher rates of loan denials than white or Asian applicants, even after correcting for income. Further, these highly denied racial and ethnic groups appear to have been disproportionately impacted in some geographic areas of the state wherein denial rates exceeded 75 percent.

Analysis of high annual interest rate lending showed that black, American Indian, Asian, and Hispanic populations were also disproportionately impacted by an unusually higher share of lower-quality loan products. Hispanic and American Indian applicants experienced a rate double than that of white applicants, while black applicants experienced a rate more than three times that of white applicants. With such high proportions of these minorities receiving lower-quality, high-interest rate loans, the burden of foreclosure likely tended to fall more heavily upon these particular groups.

Analysis of data from the Community Reinvestment Act (CRA), which was developed to encourage investment in communities of low- and moderate-income areas, showed that business loans were likely not sufficiently originated in areas with higher levels of poverty in the State of Minnesota.

Fair housing complaint data was requested from HUD and the Minnesota Department of Human Rights (DHR). Data from these sources showed that 682 complaints were filed in the state from January 2004 through June 2011. The number of complaints filed with these agencies varied by year and ranged from 76 to 106, with 2011 excluded as a partial year. Housing complaint data was also received from the Legal Aid Society of Minneapolis. The protected classes disproportionately impacted by discrimination in rental markets based on successfully conciliated complaints were disability, race, familial status, and national origin. The most common issues regarding these complaints were:

- Failure to make reasonable accommodation;
- Discriminatory terms, conditions, or privileges relating to rental;
- Discriminatory refusal to rent; and
- Discriminatory terms, conditions, privileges, or services and facilities.

A review of a sample of more than 550 Craigslist postings throughout the state from September 2011 revealed few instances of poor language choices in advertisements for housing in the rental market, with some preferential statements made based on sex, age, and familial status.

Results from the private sector portion of a fair housing survey, which was conducted as part of the AI process, showed that many respondents saw possible issues of housing discrimination in Minnesota's private housing sector. Issues described by respondents regarding the rental markets related to denial of available units, refusal to rent,

discriminatory terms and conditions, and failure to make reasonable accommodation or modification. In the home purchase and lending industries, comments related to steering, redlining, denial of loans, and predatory lending. Additional concerns voiced about the private housing sector in Minnesota included failure to comply with disability codes in housing construction and location- and race-based discrimination in the home insurance and home appraisal industries.

Fair Housing in the Public Sector

The status of affirmatively furthering fair housing within Minnesota's public sector was primarily evaluated through a review of the placement of several types of assisted housing in the state; the relationships among the location of employment, job training centers, and transportation services; and the results of the public sector section of the fair housing survey.

Evaluation of the placement of public and other forms of assisted housing in the state, such as Section 8 properties, Low Income Housing Tax Credit housing, and supportive housing for special needs populations, demonstrated that these housing options are more plentiful in urban areas of the state and in a few rural areas.

An examination of the relationship among the location of employment centers, job training centers, and transit systems in the State of Minnesota revealed that these services appear to be adequate in the metro and suburban areas but may be less accessible in the rural areas of the state.

Results from the public sector section of the fair housing survey revealed that many respondents in Minnesota believed there were problematic practices or policies within the public sector. Several comments indicated that development of many types of housing, including group homes and multi-family housing, were restricted to less desirable areas due to community resistance, land use policies, and zoning laws. Respondents also addressed a lack of enforcement of health and safety codes; housing occupancy standards that restrict housing choice for families; local government policies that are often not available in multiple languages; and a lack of public transportation, which may act as a barrier to accessing housing, government, and community services.

Public Involvement

Public involvement opportunities were an intrinsic part of the development of this AI. Activities included a fair housing survey, which evaluated current fair housing efforts, and forums wherein citizens were offered the chance to comment on initial findings of the AI and to provide feedback on prospective impediments.

Results of the fair housing survey, which was completed by 562 persons throughout Minnesota, showed that most respondents felt that fair housing laws were useful but that

they may be difficult to understand or follow. While many respondents said that they were aware of fair housing training, such as classes and seminars, less than 30 percent of respondents said that they had taken part in any fair housing training. Respondents also showed less familiarity with the classes of persons protected by fair housing laws in Minnesota as well as where to refer someone with a housing complaint. Many respondents noted the need for increased fair housing education and outreach activities, and a moderate need was indicated for increased testing and enforcement activities, especially outside of the Twin Cities metropolitan region with the exception of Duluth. Some respondents wanted fair housing laws changed in the state, and suggestions for revision included adding protection for persons with a criminal history and including Section 8 recipients under the umbrella of receipt of public assistance. Stricter penalties for violations of fair housing laws were also suggested.

Regional forums held in several locations throughout Minnesota in October 2011 allowed citizens and agencies to voice concerns about barriers to fair housing choice. Comments received at these sessions indicated issues related to the difficulties associated with addressing fair housing in urban versus suburban versus rural areas in the state as well as problems regarding inadequately monitoring local policies and practices to ensure compliance with fair housing laws. Public input opportunities were also created after release of the draft report for public review; written comments were also received, which influenced the content of this final report.

IMPEDIMENTS TO FAIR HOUSING CHOICE AND SUGGESTED ACTIONS

The 2011 AI for the State of Minnesota uncovered many issues regarding fair housing in the state. Selection of these items as impediments to fair housing choice was based on HUD's definition of impediments as actions, omissions or decisions that restrict housing choice due to protected class status. The identified impediments are presented below and accompanied by appropriate actions that the State may implement in order to alleviate or eliminate these impediments, in addition to measurable objectives attached to each action item. The goal of these actions is to offer greater housing choice for protected classes and all citizens within the State of Minnesota.

IMPEDIMENTS TO FAIR HOUSING CHOICE AND SUGGESTED ACTIONS (Modified October 3, 2012)

Private Sector Impediments, Actions, and Measurable Objectives

Impediment 1: Lack of understanding of fair housing and affirmatively furthering fair housing

Action 1.1: Ensure that Minnesota Housing-financed rental developments have Affirmative Fair Housing Marketing Plans

Measurable Objective 1.1: Number of approved AFHMPs

Action 1.2: Review AFHMPs of Section 8 developments for which Minnesota Housing manages the subsidy at least every 5 years.

Measurable Objective 1.2: Number of AFHMPs reviewed and, if necessary, modified.

Action 1.3: Explore a model to identify non Section 8 multifamily developments with AFHMPs that may be out of date and require review and modification.
Measurable Objective 1.3: A model is developed and implemented.

Action 1.4: Review marketing activities for compliance with the AFHMP and that the fair housing logo is used in advertising materials.
Measurable Objective 1.4: Number of reviews of AFHMPs.

Action 1.5: Distribute flyers and education materials at annual conferences, public venues, and other opportunities
Measurable Objective 1.5: Number of materials distributed

Action 1.6: Explore with the Minnesota Multi Housing Association possibilities for training multifamily property owners, managers, and service providers
Measurable Objective 1.6.1: Document meetings with the Association
Measurable Objective 1.6.2: Publicize the availability of training to Minnesota Housing-associated rental property owners or managers

Action 1.7: Support HousingLink's efforts to educate owners and tenants on fair housing
Measurable Objective 1.7: Provide funding to HousingLink

Action 1.8: Implement the Sustainable Communities grant to develop best practices and fair housing resources for rental owners
Measurable Objective 1.8: Developers and owners will be encouraged to use the work product when it becomes available.

***Impediment 2*: Discriminatory terms and conditions in rental markets**
Action 2.1: Conduct outreach and education activities for housing providers
Measurable Objective 2.1: Support the "Working Together" conference

Action 2.2: Support HousingLink's efforts to educate owners and tenants on fair housing
Measurable Objective 2.2: Provide funding to HousingLink

Action 2.3: Review policies of Section 8, LIHTC, and HOME assisted housing for discriminatory terms and conditions in leases, house rules and tenant selection plans and occupancy policies.
Measurable Objective 2.3: Results of the reviews

***Impediment 3*: Failure to make reasonable accommodation or modification**
Action 3.1: Conduct outreach and education activities for housing providers
Measurable Objective 3.1.1: Support the "Working Together" conference

Measurable Objective 3.1.2: Ensure that rent-assisted housing have formal grievance procedures that provide resolution of complaints alleging discrimination based on disability

Action 3.2: Support HousingLink's efforts to educate owners and tenants on fair housing issues, including reasonable accommodation
Measurable Objective 3.2: Provide funding to HousingLink

***Impediment 4*: Discriminatory refusal to rent**
Action 4.1: Conduct outreach and education activities for housing providers
Measurable Objective 4..1: Support the "Working Together" conference

Action 4.2: Periodically review occupancy of Tax Credit developments and evaluate whether households of color and disabled persons are under-represented.
Measurable Objective 4.2: Production of periodic report

Action 4.3: Discuss with the Minnesota DHR how testing and enforcement can be supported by DEED, DHS, and Minnesota Housing
Measurable Objective 4.3.1: Determine appropriate support roles of DEED, Minnesota Housing, and DHS
Measurable Objective 4.3.2: Execute support roles.

***Impediment 5*: Failure to comply with federal and state accessibility standards**
Action 5.1: Conduct outreach and education activities for housing providers
Measurable Objective 5.1: Number of outreach and education activities conducted
Action 5.2: Ensure that multifamily developments newly-financed by Minnesota Housing comply with applicable building codes and accessibility and visitability standards
Measurable Objective 5.2: Number of financed developments that are found to be compliant
Action 5.3: Consult with representatives of the disability community to understand the type of housing discrimination the disabled population experiences and to consider whether there are strategies for how Minnesota Housing's programs can be marketed to owners and developers who are identified as having failed to comply with accessibility standards.
Measurable Objective 5.3: Conduct at least one meeting with disability community representatives and consider implementing viable strategies.

***Impediment 6*: Steering in the home purchase and rental markets**
Action 6.1: Support the Emerging Markets Homeownership Initiative
Measurable Objective 6.1(a): Number of advisory council meetings attended
Measurable Objective 6.1(b): Funding support for the Minnesota Home Ownership Center
Measurable Objective 6.1(c): Number of realtors and lenders of color who have been trained on Minnesota Housing homebuyer programs

Action 6.2: Market mortgages and downpayment assistance to households of color

Measurable Objective 6.2: Number of loans to households of color that are made or purchased by Minnesota Housing

Action 6.3: Educate homebuyers on the responsibilities and roles of realtors, lenders, and other actors who will be involved in their home buying experience so that they may recognize steering should it occur.
Measurable Objective 6.3: Number of persons attending Home Ownership Center homebuyer training.

Action 6.4: Provide housing subsidy for persons with serious mental illness
Measurable Objective 6.4: Number of households receiving assistance

Action 6.5: Provide permanent supportive housing for persons and families with mental illness, substance abuse disorders, or HIV/AIDS who are homeless or at risk of homelessness
Measurable Objective 6.5: Number of households provided permanent supportive housing

***Impediment 7*: Denial of home purchase loans**

Action 7.1: Enhance homebuyer understanding of real estate transactions, provide information on resources available to them if they are denied credit or feel they are discriminated against in the mortgage market, and establishing and keeping good credit through education and training
Measurable Objective 7.1: Number of persons attending Home Ownership Center homebuyer training.

Action 7.2: Reach out to lenders, realtors, and emerging market communities through industry and emerging market community events to make them aware of Minnesota Housing's first time homebuyer programs
Measurable Objective 7.2.(a): Number of events attended or sponsored
Measurable Objective 7.2.(b) Percent of loans made to emerging market borrowers

***Impediment 8*: Predatory-style lending activities**

Action 8.1: Enhance homebuyer understanding of real estate transactions so that they may recognize predatory lending and provide resources for them to discuss possible predatory loan products.
Measurable Objective 8.1: Number of attendees of homeownership training

Action 8.2: Limit subordinations of HOME HELP downpayment assistance loans to mortgages at prevailing rates and fees for the borrower's risk category
Measurable Objective 8.2: The number of requests for subordination to predatory loans that are rejected.

Public Sector Impediments, Actions, and Measurable Objectives
***Impediment 1*: Insufficient fair housing outreach and education efforts**

Action 1.1: Work with Minnesota NAHRO and the Minnesota Multi Housing Association to provide education to public sector housing providers through at their annual conferences

Measurable Objective 1.1: Number of outreach and education activities conducted

Action 1.2: Distribute fair housing flyers and education materials at annual conferences, public venues, and other opportunities

Measurable Objective 1.2: Number of materials distributed

***Impediment 2*: Lack of sufficient fair housing testing and enforcement activities**

Action 2.1: Determine with the Minnesota DHR the process of testing and enforcement and how it can be supported by DEED, DHS, and Minnesota Housing

Measurable Objective 2.1.1: Determine appropriate support roles of DEED, Minnesota Housing, and DHS

Measurable Objective 2.2.1: Execute support roles.

***Impediment 3*: NIMBYism (Not in My Backyard) tendencies and planning and zoning decisions affect housing availability**

Action 3.1: Incent decisions by communities that decrease segregation and increase economic integration of populations

Measurable Objective 4.1: Number of Minnesota Housing developments that are awarded selection points for zoning flexibility and economic integration

Action 3.2: Provide internet links and other pre-existing materials to city staff and developers to inform citizens about affordable housing to reduce NIMBYism.

Measurable Objective 3.2: Number of internet links on Minnesota Housing's webpage, and other materials identified to be made available to city staff and developers.

SECTION I. INTRODUCTION

BACKGROUND

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 because of 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 classes. Federal fair housing statutes are largely covered by the following three pieces of U.S. legislation:

- The Fair Housing Act,
- The Housing Amendments Act, and
- The Americans with Disabilities Act.

The purpose of fair housing laws is to protect a person's right to own, sell, purchase, or rent housing of his or her choice without fear of unlawful discrimination. The goal of fair housing law is to allow everyone equal access to housing.

WHY ASSESS FAIR HOUSING?

Provisions to affirmatively furthering fair housing are long-standing components of the U.S. Department of Housing and Urban Development's (HUD) 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 HUD's 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 Partnership (HOME), Emergency Shelter Grant[2] (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) programs into the Consolidated Plan for Housing and Community Development, which then turned into a single application cycle.

As a part of the consolidated planning process, states and entitlement communities receiving such funds as a formula allocation directly from HUD are required to submit to HUD certification that they are affirmatively furthering fair housing. This certification has three parts:

[2] The Emergency Shelter Grant was recently renamed the Emergency Solutions Grant.

1. Complete an Analysis of Impediments to Fair Housing Choice (AI),
2. Take actions to overcome the effects of any impediments identified through the analysis, and
3. Maintain records reflecting the analysis and actions taken.

In the *Fair Housing Planning Guide*, page 2-8, HUD notes that impediments to fair housing choice are:

- "Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices [and]
- Any actions, omissions or decisions that have this *effect*."[3]

State and local governments may enact fair housing laws that extend protection to other groups as well. For example, the State of Minnesota enacted its own Human Rights Act, which extends protections based on creed, sexual or affectional orientation, marital status, and receipt of public assistance. Several cities in the state, including Duluth, Minneapolis, and St. Paul, also have separate fair housing ordinances. A comparison of protections by place is presented below in Table I.1.

Table I.1
Comparison of Fair Housing Laws
State of Minnesota

Protected Group	Federal Fair Housing Act	Minnesota Human Rights Act	City of Duluth	Minneapolis Civil Rights Act	St. Paul Human Rights Act
Race	X	X	X	X	X
Sex	X	X	X	X	X
Religion	X	X	X	X	X
Familial Status	X	X	X	X	X
Disability	X	X	X	X	X
National Origin	X	X	X	X	X
Color	X	X	X	X	X
Creed		X	X	X	X
Sexual or Affectional Orientation		X	X	X	X
Ancestry				X	X
Marital Status		X	X	X	X
Receipt of Public Assistance		X	X	X	X
Age			X		X

PURPOSE OF THIS RESEARCH

According to HUD, the certification of affirmatively furthering fair housing involves:

[3] http://www.hud.gov/offices/cpd/about/conplan/fairhousingexs/Module5_TopSevenAFFH.pdf

- Analyzing and working to eliminate housing discrimination in the jurisdiction;
- Promoting fair housing choice for all persons;
- Providing opportunities for racially and ethnically inclusive patterns of housing occupancy;
- Promoting housing that is physically accessible to, and usable by, all persons, particularly individuals with disabilities; and
- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act.[4]

The objective of the 2011 Minnesota AI was to research, analyze, and identify prospective impediments to fair housing choice throughout the state and to suggest actions that the lead agency, the Minnesota Department of Employment and Economic Development (DEED) as well as the Minnesota Housing Finance Agency (Minnesota Housing) and the Minnesota Department of Human Services (DHS) can consider when working toward eliminating or mitigating the identified impediments.

GEOGRAPHIC SCOPE OF THE PROJECT

This AI addresses the status of fair housing across the State of Minnesota, including the entitlement cities of Bloomington, Coon Rapids, Duluth, Eden Prairie, Mankato City, Minneapolis, Minnetonka, Moorhead, North Mankato City, Plymouth, Rochester, Saint Cloud, St. Paul, and Woodbury City, and the entitlement counties of Anoka County, Dakota County, Hennepin County, Ramsey County, St. Louis County, and Washington County. Map I.1, on the following page, shows the State of Minnesota by census tract. County seats throughout the state with populations in excess of 10,000 persons are labeled.

RESEARCH METHODOLOGY

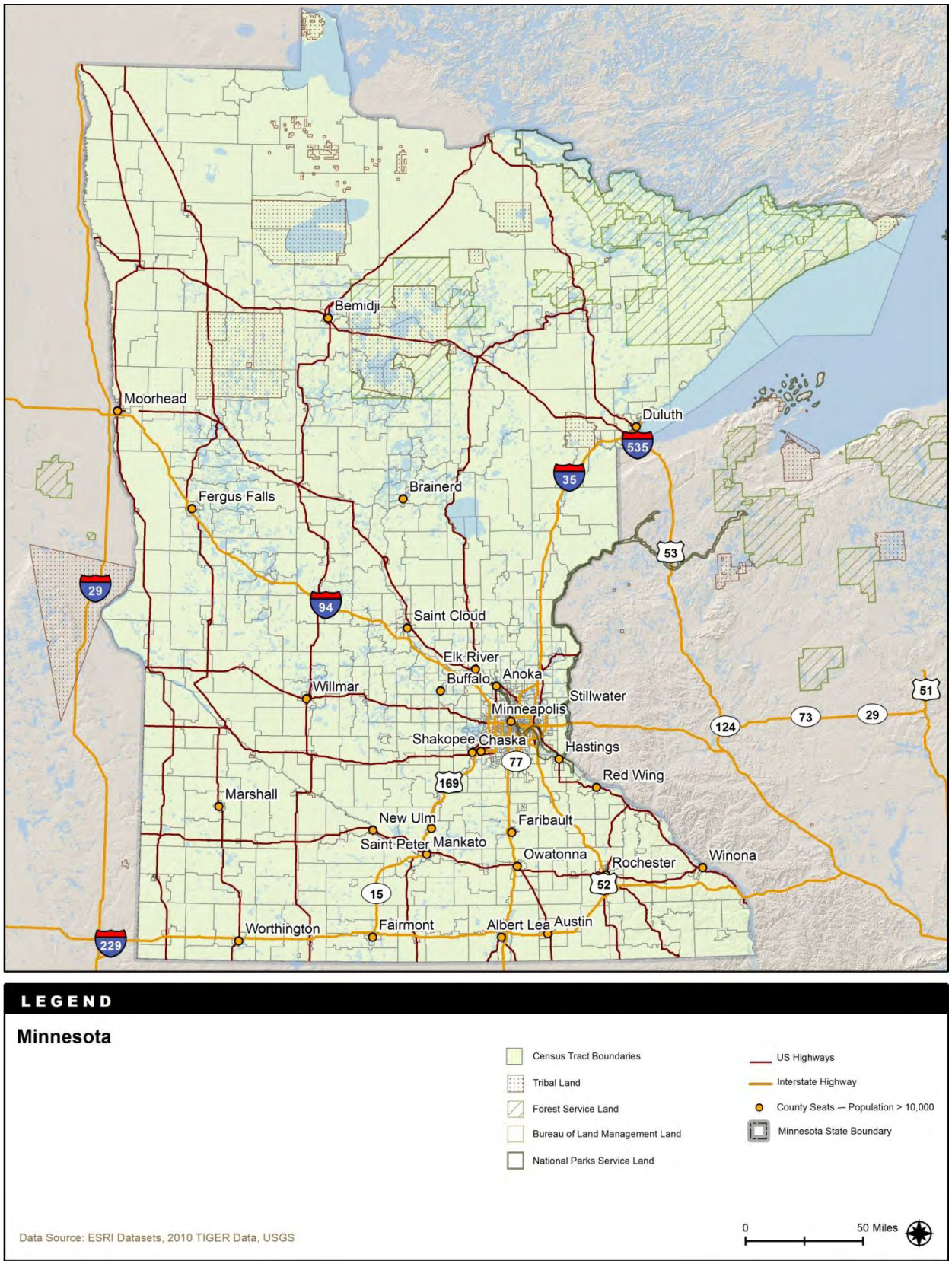
The AI process involves a thorough examination of a variety of sources related to housing, particularly for persons who are protected under fair housing laws. AI sources include census data, employment and income information, home mortgage application data, business lending, fair housing complaint information, surveys of housing industry experts and stakeholders, and related information found in the public domain. Relevant information was collected and evaluated through four general approaches:

1. *Primary Research* – the collection and analysis of raw data that did not previously exist;
2. *Secondary Research* – the review of existing data and studies;
3. *Quantitative Analysis* – the evaluation of objective, measurable, and numerical data; and
4. *Qualitative Analysis* – the evaluation and assessment of subjective data such as people's beliefs, feelings, attitudes, opinions, and experiences.

[4] *Fair Housing Planning Guide.* U.S. Department of Housing and Urban Development. March 1996, pg.1-3.

Some baseline secondary and quantitative data were drawn from the U.S. Census Bureau, including 2000 and 2010 census counts, as well as 2005 through 2009 American Community Survey data averages. Data from these sources included population, personal income, poverty estimates, housing units by tenure, cost burdens, and housing conditions. Other data were drawn from records provided by the U.S. Bureau of Labor Statistics, the U.S. Bureau of Economic Analysis, and a variety of other sources. The following narrative offers a brief description of other key data sources employed for the 2011 Minnesota AI.

Map I.1
State of Minnesota



Home Mortgage Disclosure Act Data

To examine possible fair housing issues in the home mortgage market, Home Mortgage Disclosure Act (HMDA) data were analyzed. The HMDA was enacted by Congress in 1975 and has since been amended several times. It is intended to provide the public with loan data that can be used to determine whether financial institutions are serving the housing credit needs of their communities and to assist in identifying possible discriminatory lending patterns. HMDA requires lenders to publicly disclose the race, ethnicity, and sex of mortgage applicants, along with loan application amounts, household income, the census tract in which the home is located, and information concerning prospective lender actions related to the loan application. For this analysis, HMDA data from 2004 through 2009 were analyzed, with the measurement of denial rates by census tract and by race and ethnicity of applicants as the key research objectives. These data were also examined to identify the groups and geographic areas most likely to encounter higher denial rates and receive loans with unusually high loan rates.

Fair Housing Complaint Data

Housing complaint data were used to analyze discrimination in the renting and selling of housing. HUD provided fair housing complaint data for the state from January 2004 through June 2011. That information included the basis or bases of the complaint; issue or issues pursuant to the grievance; and closure status of the alleged fair housing infraction, which relates to the result of the investigation, including any testing conducted in the enforcement process. The review of nearly 700 fair housing complaints from within the state allowed for inspection of the tone, the relative degree and frequency of certain types of unfair housing practices seen, and the degree to which they were found to be with cause. Analysis of complaint data also focused on determining which protected classes may have been disproportionately impacted by housing discrimination based on the number of complaints, all the while acknowledging that many individuals may be reluctant to step forward with a fair housing complaint for fear of retaliation or similar repercussion.

Fair Housing Survey

One of the methods HUD recommends for gathering public input about perceived impediments to fair housing choice is to conduct a survey. As such, the State elected to utilize a survey instrument as a means to encourage public input in the AI process. This step was a cost-effective and efficient method to utilize research resources.

The survey targeted individuals involved in the housing arena, although anyone was allowed to complete the survey. The prospective contact list was assembled by the participating agencies with the goal of targeting experts in at least the following areas:

- Residential and commercial building codes and regulations;

- State, local, and federal occupancy standards;
- Residential health and safety codes and regulations (structural, water, and sewer);
- State and local land use planning;
- Banking and insurance laws and regulations;
- Real estate development, real estate sales, and management laws and regulations;
- Renter rights and obligations, including civil rights;
- Fair housing, disability, social service, and other advocacy organizations; and
- Habitat for Humanity, public housing agencies, or similar housing providers.

The survey approach also assured that selected target populations, through their in-need service provider network or advocacy organizations, were well represented. Furthermore, these entities were utilized to help promote public involvement throughout the AI process. The Minnesota fair housing survey, which was conducted primarily online, received 562 responses.

The survey protocol involved sending an email announcement to each prospective respondent with an introduction to the upcoming survey, its purpose, and its intent. A link was provided that directed respondents to the online survey. The email message also urged respondents to forward the survey announcement to other individuals and agencies involved in housing. Furthermore, the announcement and survey link were posted on the DEED and Minnesota Housing websites, and printed copies were made available during public meetings.

The survey was designed to address a wide variety of issues related to fair housing and affirmatively furthering fair housing. If limited input on a particular topic was received, it was assumed that the entirety of stakeholders did not view the issue as one of high pervasiveness or impact. This does not mean that the issue was non-existent in the state but rather that there was not a large perception of its prevalence as gauged by survey participants.

The following narrative summarizes key survey themes and data that were collected from the survey instrument.

Federal, State, and Local Fair Housing Laws

The first section of the survey asked respondents to address a number of questions related to fair housing laws, including assessment of their familiarity with and understanding of these laws, knowledge of classes of persons protected by these laws, the process for filing fair housing complaints, and an inquiry into whether or not fair housing laws should be changed.

Fair Housing Activities

The second section of the survey evaluated stakeholders' awareness of and participation in fair housing activities in the state, including outreach activities such as trainings and seminars as well as monitoring and enforcement activities such as fair housing testing exercises.

Barriers to Fair Housing Choice in the Private Sector

This section addressed fair housing in Minnesota's private housing sector and offered a series of two-part questions. The first part asked respondents to indicate awareness of questionable practices or barriers to fair housing choice in a variety of private sector industries, and the second part requested a narrative description of these questionable practices or concerns if an affirmative response was received. The specific areas of the private sector that respondents were asked to examine included the:

- Rental housing market,
- Real estate industry,
- Mortgage and home lending industries,
- Housing construction or accessible housing design fields,
- Home insurance industry,
- Home appraisal industry, and
- Any other housing services.

The use of open-ended questions allowed respondents to address any number of concerns such as redlining, neighborhood issues, lease provisions, steering, sub-standard rental housing, occupancy rules, or other fair housing issues in the private housing sector of the state.

Fair Housing in the Public Sector

In a manner similar to the previous section, respondents were asked to offer insight into awareness of questionable practices or barriers to fair housing in the public sector. A list of areas within the public housing sector was provided, and respondents were asked to first specify their awareness of fair housing issues within each area. If they were aware of any fair housing issues, they were asked to further describe these issues in a narrative fashion. Respondents were asked to identify fair housing issues within the following public housing sector areas:

- Land use policies,
- Zoning laws,
- Occupancy standards or health and safety codes,
- Property tax policies,
- Permitting processes,
- Housing construction standards,

- Neighborhood or community development policies,
- Public housing authorities,
- Access to government services,
- Barriers to minorities serving as representatives,
- Any other public administrative actions or regulations, and
- Jurisdictional definitions relating to fair housing.

Respondents were also asked to identify their awareness of barriers that limit access to government services, including public housing, transportation, and employment services, and also to indicate their awareness of any fair housing compliance issues with local public housing authorities.

The questions in this section were used to identify fair housing issues in the state regarding zoning, building codes, accessibility compliance, subdivision regulations, displacement issues, development practices, residency requirements, property tax policies, land use policies, and NIMBYism.[5]

Additional Questions
Finally, respondents were asked about their awareness of any local fair housing plans or specific geographic areas of the state with fair housing problems. Respondents were also asked to leave additional comments.

Research Conclusions

The final list of impediments to fair housing choice for the State of Minnesota was culled from all quantitative, qualitative, and public input-based sources and was based on HUD's definition of an impediment to fair housing choice as any action, omission or decision based on protected class status that affects housing choice. Determinations of qualification as an impediment were derived from the frequency and severity of occurrences drawn from quantitative and qualitative data evaluation and findings.

LEAD AGENCY

The Minnesota DEED served as the lead agency for preparation of the 2011 Analysis of Impediments to Fair Housing Choice. Minnesota Housing and the Minnesota DHS also participated in the process. Western Economic Services, LLC, a consulting firm specializing in analysis and research in support of housing and community development planning, based in Portland, Oregon, prepared this AI.

Commitment to Fair Housing

[5] "Not In My Backyard" mentality

In accordance with the applicable statutes and regulations governing the Consolidated Plan, the State of Minnesota certifies that it will *affirmatively further fair housing*. This statement means that the State has conducted an AI, will take appropriate actions to overcome the effects of any impediments identified through that analysis, and will maintain records reflecting the analysis and actions taken in this regard. The cooperative partnership between DEED, Minnesota Housing, and DHS not only helps to affirmatively further fair housing in Minnesota but can also strengthen the abilities of other fair housing agencies throughout the state.

PUBLIC INVOLVEMENT

The State conducted the public input process associated with this AI. The key actions that were used to notify the public of the AI process included email announcements, public postings, newspaper advertisements and notices, phone calls, and other communication activities directed to citizens and stakeholders in the fair housing arena.

As part of the process of involving the public in development of the AI, the State conducted three focus groups with housing and community development stakeholders.

Additionally, the State held a series of five regional forums during the week of October 17, 2011, in the cities of Grand Rapids, Detroit Lakes, Saint Cloud, Marshall, and St. Paul. The forums were designed to offer the public opportunity to supply commentary on the status of fair housing in Minnesota as well as to provide feedback on the initial findings of the AI. A detailed discussion of these sessions is presented in Section VII, Public Involvement.

The draft report was released for public review on November 30, 2011, and initiated a 30-day public review period. The final report was released in January 2012.

SECTION II. SOCIO-ECONOMIC CONTEXT

INTRODUCTION

This section presents demographic, economic, and housing information collected from the Census Bureau, the Bureau of Economic Analysis, the Bureau of Labor Statistics, and other sources. Data were used to analyze a broad range of socio-economic characteristics, including population growth, race, ethnicity, disability, employment, poverty concentrations, and housing trends. Ultimately, the information presented in this section helps illustrate the underlying conditions that have shaped housing market behavior and housing choice in Minnesota.

To supplement 2000 and 2010 census data, information for this analysis was also gathered from the Census Bureau's American Community Survey (ACS). The ACS data cover similar topics compared to the decennial counts and estimates and include data not appearing in

the 2010 census such as household income and poverty data. The key difference in these data sets is that ACS data represent a five-year average of annual data estimates as opposed to a 100 percent count; in this case, the ACS surveys represent an average of data from 2005 through 2009. The ACS figures are not directly comparable to decennial census counts because they do not account for certain population groups such as the homeless. However, population distributions from the ACS data can be compared to share data from the census counts.

DEMOGRAPHICS

POPULATION DYNAMICS

Table II.1, at right, shows the population counts in the State of Minnesota, as drawn from the 2000 and 2010 censuses. In total, population in the state increased from 4.9 million persons in 2000 to 5.3 million persons in 2010, or by 7.8 percent.

Table II.1
Population Change
State of Minnesota
Census Bureau Data

Year	Total
2000	4,919,479
2010	5,303,925
% Change 00 - 10	**7.8**

POPULATION BY AGE

Data on population by age in 2000 and 2010 in the State of Minnesota, presented on the following page in Table II.2, showed that the largest population groups in both census counts represented persons aged 5 to 19 and 35 to 54. However, these two age cohorts were also the only groups to show a decrease in population between 2000 and 2010, by 2.7 percent and 0.1 percent, respectively. On the other hand, the group aged 55 to 64 showed a significant increase of more than 55 percent during this time, and the number of persons aged 20 to 24 and 65 or older both showed increases of more than 10 percent.

Table II.2
Population by Age
State of Minnesota
Census Bureau Data

Age	2000 Census		2010 Census		00 - 10 % Change
	Population	% of Total	Population	% of Total	
Under 5	329,594	6.7%	355,504	6.7%	7.9%
5 to 19	1,105,251	22.5%	1,075,707	20.3%	-2.7%
20 to 24	322,483	6.6%	355,651	6.7%	10.3%
25 to 34	673,138	13.7%	715,586	13.5%	6.3%
35 to 54	1,489,878	30.3%	1,488,992	28.1%	-0.1%
55 to 64	404,869	8.2%	629,364	11.9%	55.4%
65 and Over	594,266	12.1%	683,121	12.9%	15.0%
Total	**4,919,479**	**100.0%**	**5,303,925**	**100.0%**	**7.8%**

Information regarding the elderly population was also collected from the 2000 and 2010 census counts. As shown below in Table II.3, in both 2000 and 2010, the largest age cohorts represented persons in the age ranges of 70 to 74 and 75 to 79. However, the age groups that showed the largest increases over the decade were those at the youngest and oldest ends of the spectrum, or persons aged 65 to 66 and 85 years or older.

Table II.3
Elderly Population by Age
State of Minnesota
Census Bureau Data

Age	2000 Census		2010 Census		00 - 10 % Change
	Population	% of Total	Population	% of Total	
65 to 66	62,176	10.5%	79,079	12.3%	27.2%
67 to 69	90,993	15.3%	100,810	15.7%	10.8%
70 to 74	142,656	24.0%	142,853	22.2%	0.1%
75 to 79	122,677	20.6%	122,639	19.1%	0.0%
80 to 84	90,163	15.2%	98,059	15.2%	8.8%
85 and Over	85,601	14.4%	99,624	15.5%	16.4%
Total	**594,266**	**100.0%**	**643,064**	**100.0%**	**8.2%**

POPULATION BY RACE AND ETHNICITY

Between 2000 and 2010, the white population grew by the largest total number of persons but increased by the smallest percentage share of all racial groups, or by only 2.8 percent. Some racial groups showed significant growth such as the black population, which increased by 59.8 percent; the other race population, which grew by 56.5 percent; the two or more races population, which increased by 51.2 percent; and the Asian population, which grew by 50.9 percent. In terms of ethnicity, which is defined separately from race, the Hispanic population increased by 74.5 percent, or from 143,382 to 250,258 persons, between 2000 and 2010, as shown on the following page in Table II.4.

Table II.4
Population by Race and Ethnicity
State of Minnesota
Census Bureau Data

Race/Ethnicity	2000 Census		2010 Census		00 - 10 % Change
	Population	% of Total	Population	% of Total	
White	4,400,282	89.4%	4,524,062	85.3%	2.8%
Black	171,731	3.5%	274,412	5.2%	59.8%
American Indian	54,967	1.1%	60,916	1.1%	10.8%
Asian	141,968	2.9%	214,234	4.0%	50.9%
Native Hawaiian/Pacific Islander	1,979	0.0%	2,156	0.0%	8.9%
Other	65,810	1.3%	103,000	1.9%	56.5%
Two or More Races	82,742	1.7%	125,145	2.4%	51.2%
Total	**4,919,479**	**100.0%**	**5,303,925**	**100.0%**	**7.8%**
Hispanic (Ethnicity)	143,382	2.9%	250,258	4.7%	74.5%

The geographic distribution of racial and ethnic minorities can vary throughout a region. HUD has determined that an area demonstrates a disproportionate share of a population when the percentage of that population is 10 or more percentage points higher than the study area average. For example, Minnesota's black population represented 3.5 percent of the population in 2000. Therefore, any census tract in the state that showed a black population in excess of 13.5 percent held a disproportionate share of this population. This analysis of racial and ethnic distribution was conducted by calculating race or ethnicity as the percentage share of total population and then plotting the data on a geographic map of census tracts in the State of Minnesota. For the purposes of this AI, maps were produced for several racial and ethnic groups based on both 2000 and 2010 census data in order to examine how the concentrations of these populations changed over time. These maps are presented on the following pages and discussed below.

Map II.1, on page 23, shows that, in 2000, the black population in Minnesota was concentrated in a few census tracts. These tracts were located in and around the Minneapolis area, where the population demonstrated shares in excess of the disproportionate share threshold of 13.5 percent and as high as 67.1 percent. No tracts with a disproportionate share of the black population occurred outside the Twin Cities metropolitan area.

The average black population increased from 3.5 percent in 2000 to 5.2 percent in 2010. Map II.2, on page 24, reveals that, in 2010, the black population remained concentrated in the metro region and increased in census tracts north of Minneapolis. Several tracts demonstrated an increase in percentage share, and the highest demonstrated level of concentration increased to 72.5 percent.

Map II.3, on page 25, presents the concentration of the Asian population in the State of Minnesota, as of the 2000 census. The Asian population was concentrated in the Twin Cities metropolitan area, and several tracts showed a disproportionate share of this population in excess of 12.9 percent and as high as 56 percent.

The distribution of the Asian population in Minnesota, as of the 2010 census, is shown on page 26 in Map II.4. The average percent Asian population per tract increased by only 1.1 percent, but several tracts on the edges of the Minneapolis area showed an increase of the Asian population by a large percentage. However, the highest levels of concentration in the state decreased to 43.2 percent, indicating that the Asian population experienced some integration since 2000.

The concentration of the American Indian population in Minnesota at the time of the 2000 census is presented on page 27 in Map II.5. The tracts with the highest shares of this population, well above the disproportionate share threshold of 11.1 percent and as high as 96.6 percent, corresponded with some of the tribal land boundaries in the northern parts of the state. However, a few tracts in the far northern part of the state displayed shares of the American Indian population around or below the disproportionate share threshold despite being made up in part by one or more reservations.

The average American Indian population did not change between 2000 and 2010, remaining at 1.1 percent. However, while several tracts were heavily concentrated, a few additional tracts demonstrated disproportionate shares of the American Indian population by 2010. Tracts west of Duluth and east of Marshall increased considerably, showing concentrations as high as 70 and 40 percent, respectively. The concentration decreased in the urban Minneapolis area, however. These data are shown on page 28 in Map II.6.

The concentration of the Hispanic ethnic population at the time of the 2000 census is presented on page 29 in Map II.7. This group showed population concentrations above the disproportionate share in areas near St. Paul as well as north of Fergus Falls and south of New Ulm.

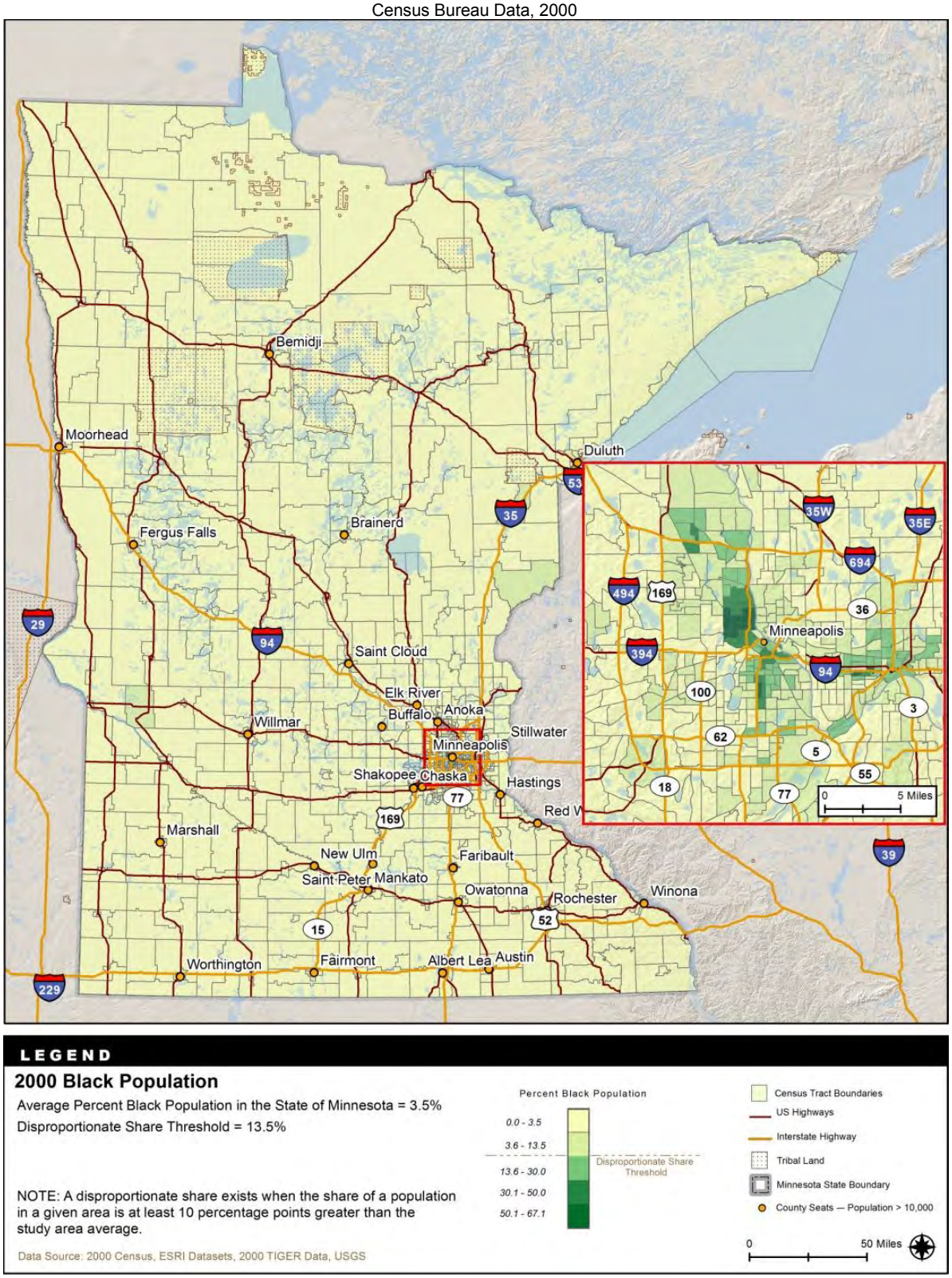
Census Bureau data showed that the Hispanic ethnic population increased from an average of 2.9 percent in 2000 to 4.7 percent in 2010. Map II.8, on page 30, reveals that relative concentrations fluctuated in several census tracts in the Twin Cities metropolitan region as well as in a few rural areas in the western parts of the state. The most concentrated tracts showed a population share as high as 44.9 percent.

Increases in concentration of minority racial and ethnic populations can be attributable to several factors other than potential housing discrimination, including historical or geographical influences, socio-economic status, cultural and self-segregation, and even

public housing policy standards and practices. Some of these issues are discussed in greater detail later in this document.

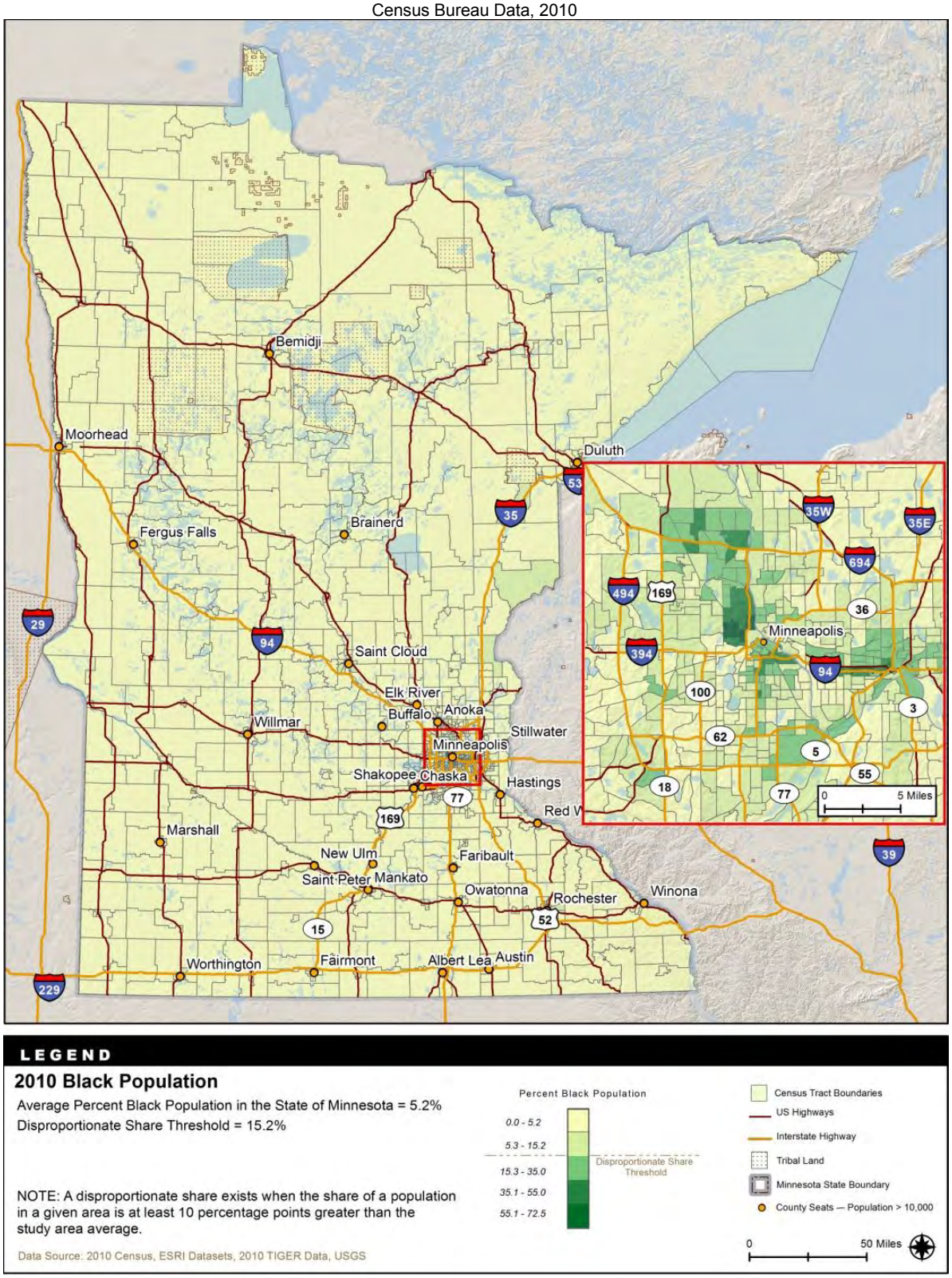
Map II.1

Percent Black Population by Census Tract
State of Minnesota
Census Bureau Data, 2000



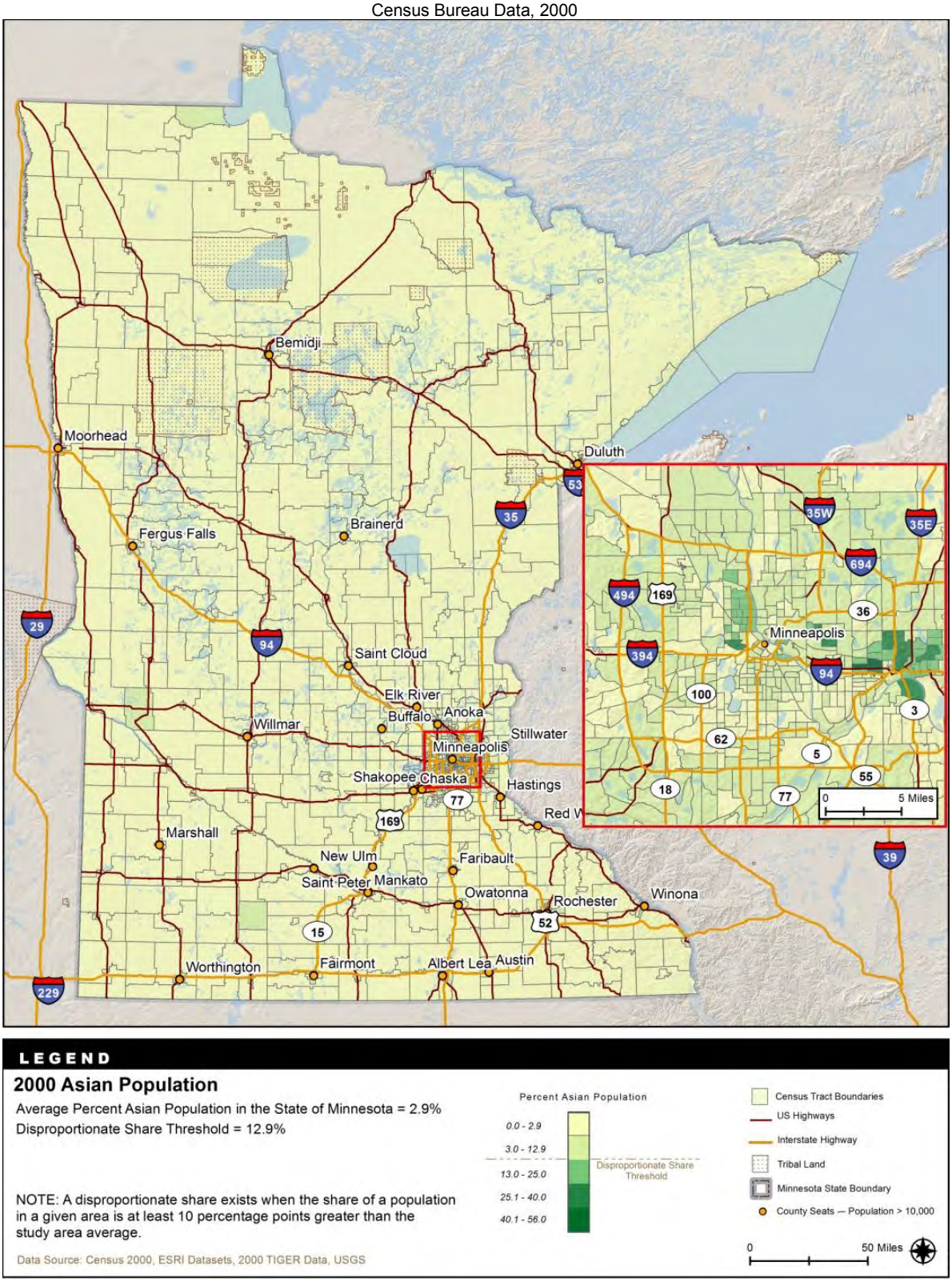
Map II.2

Percent Black Population by Census Tract
State of Minnesota
Census Bureau Data, 2010

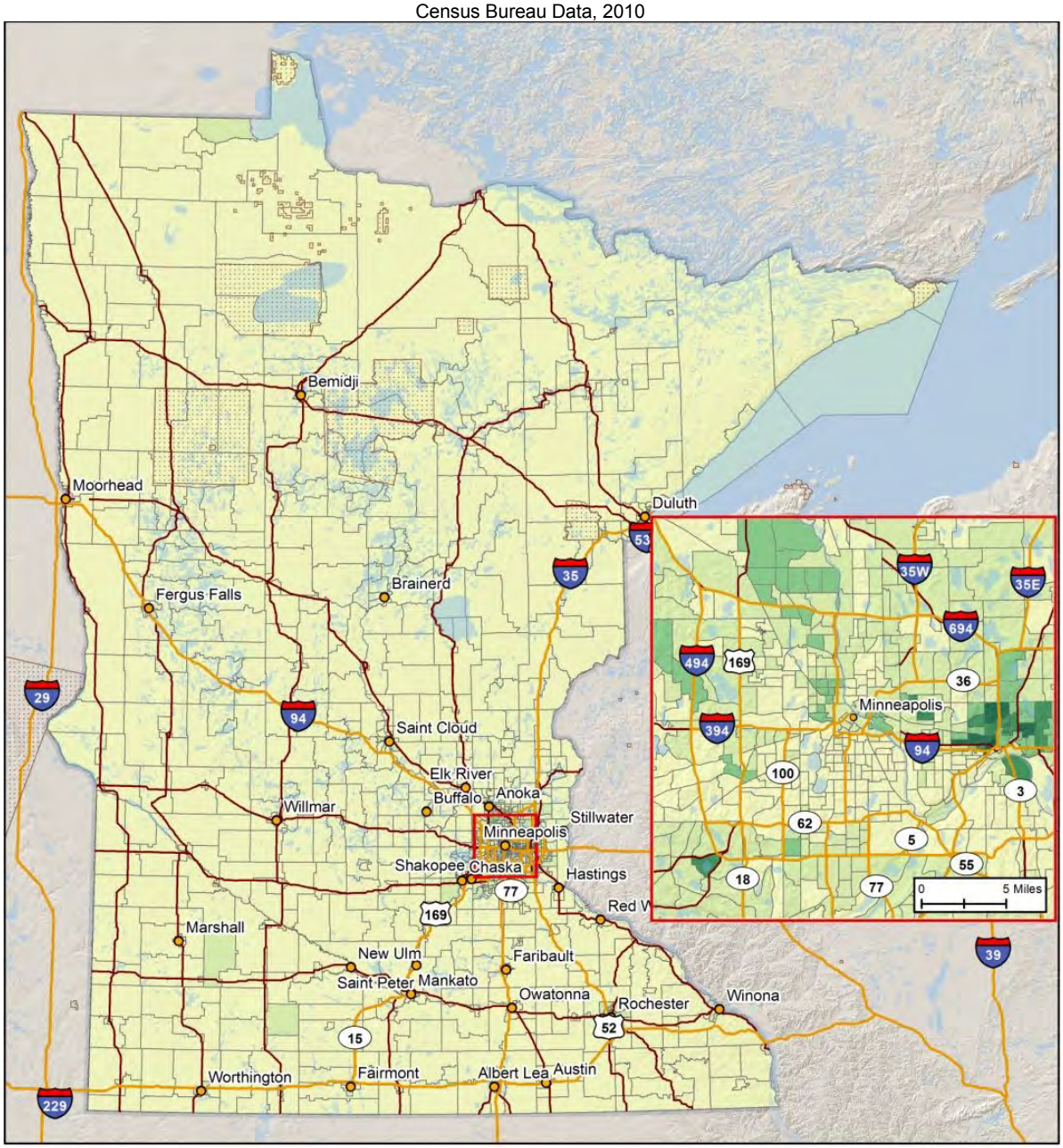


Map II.3

Percent Asian Population by Census Tract
State of Minnesota
Census Bureau Data, 2000



Map II.4
Percent Asian Population by Census Tract
State of Minnesota
Census Bureau Data, 2010



LEGEND

2010 Asian Population

Average Percent Asian Population in the State of Minnesota = 4.0%
Disproportionate Share Threshold = 14.0%

NOTE: A disproportionate share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.

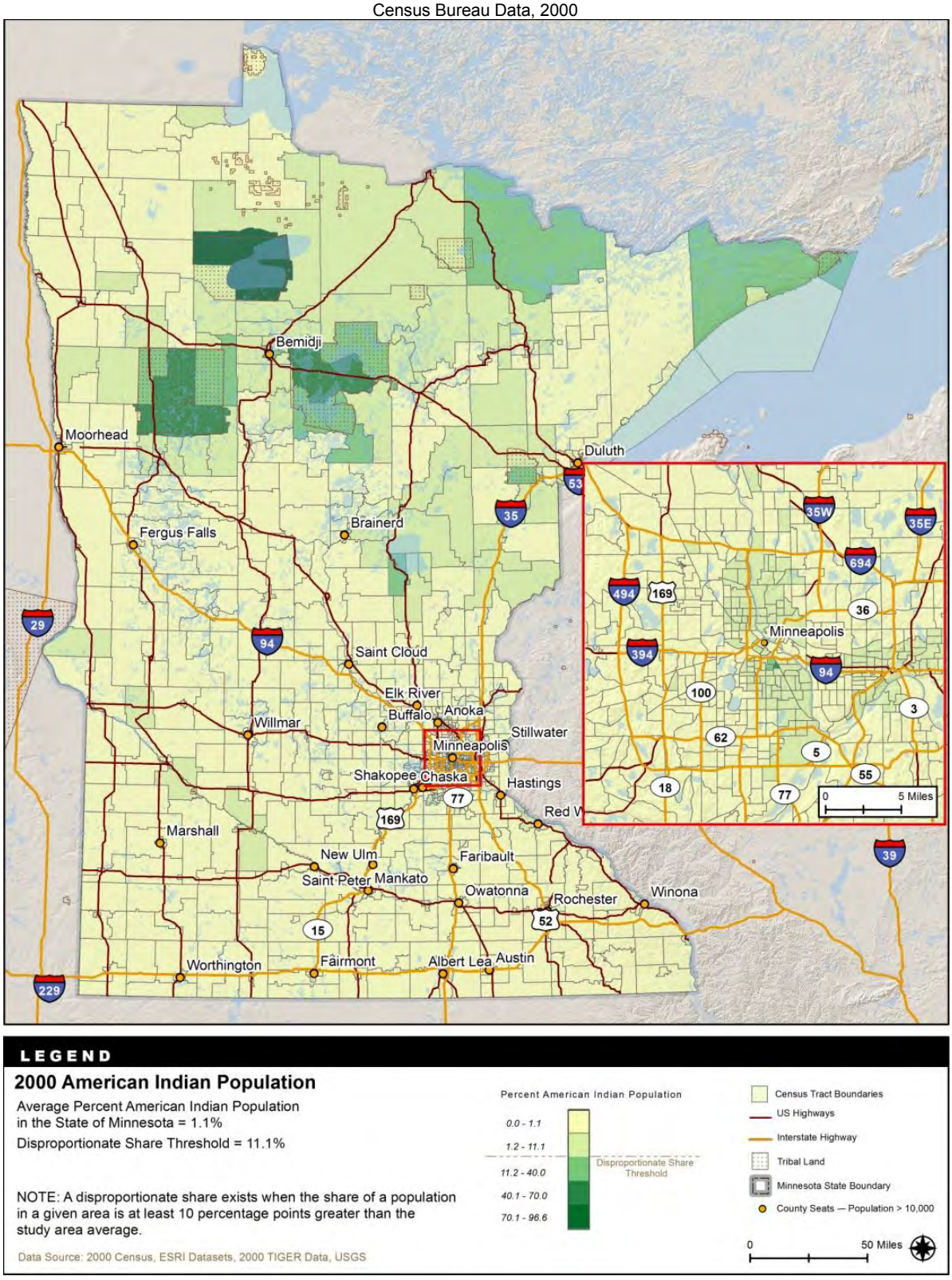
Data Source: Census 2010, ESRI Datasets, 2010 TIGER Data, USGS

Percent Asian Population
0.0 - 4.0
4.1 - 14.0
14.1 - 25.0
25.1 - 35.0
35.1 - 43.2
Disproportionate Share Threshold

Census Tract Boundaries
US Highways
Interstate Highway
Tribal Land
Minnesota State Boundary
County Seats — Population > 10,000

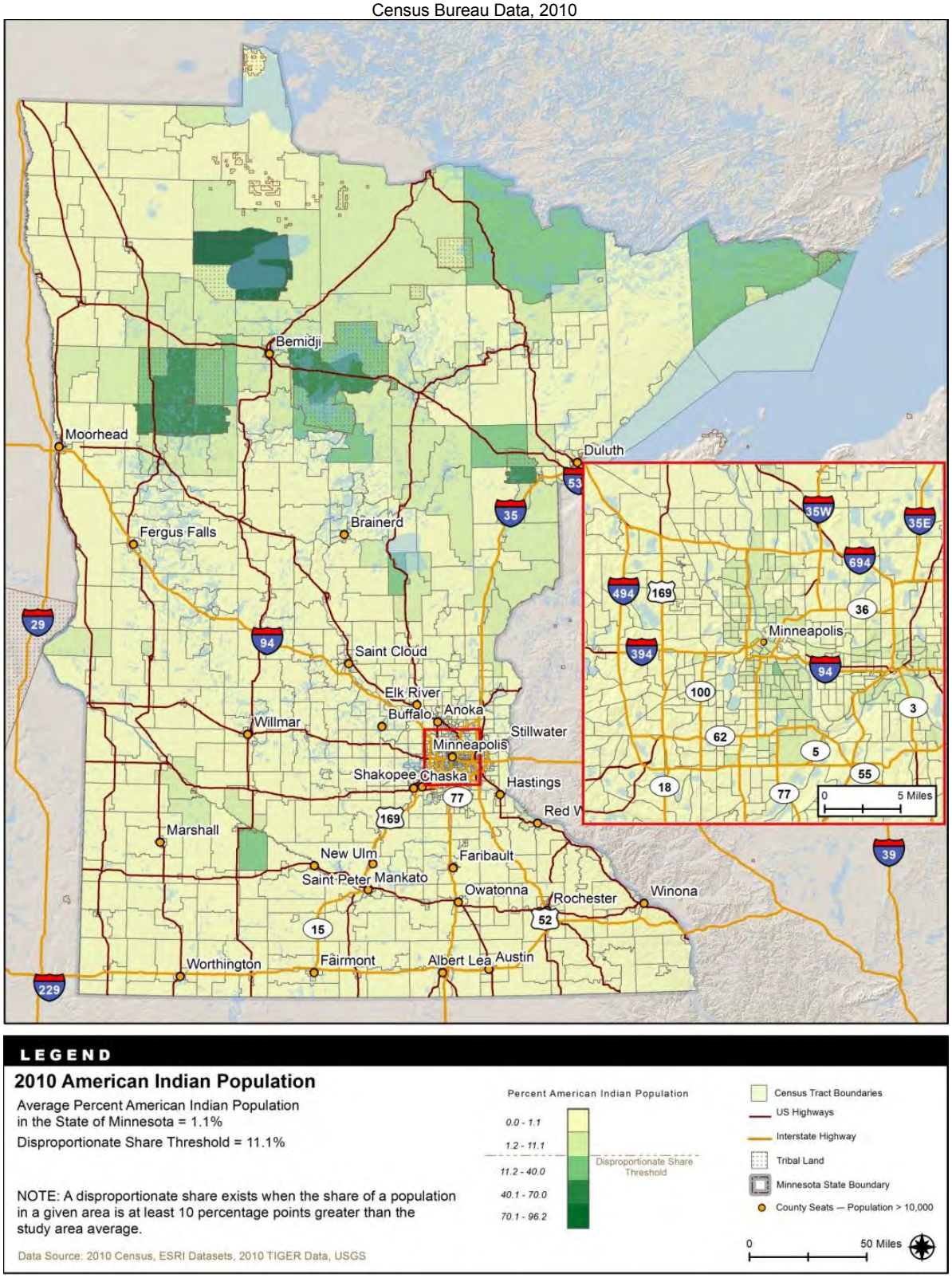
0 50 Miles

Map II.5
Percent American Indian Population by Census Tract
State of Minnesota
Census Bureau Data, 2000

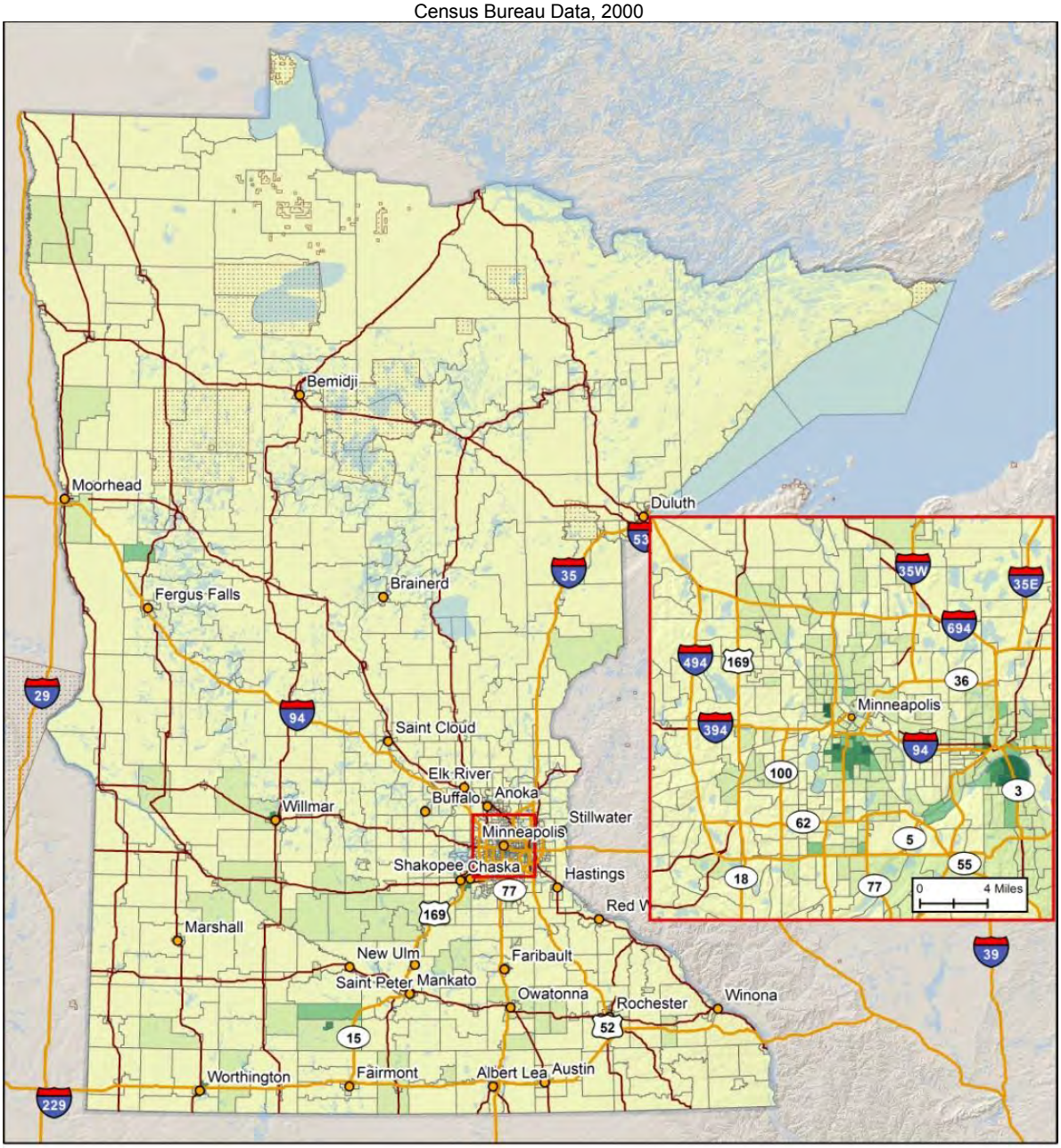


Map II.6

Percent American Indian Population by Census Tract
State of Minnesota
Census Bureau Data, 2010



Map II.7
Percent Hispanic Population by Census Tract
State of Minnesota
Census Bureau Data, 2000



LEGEND

2000 Hispanic Population

Average Percent Hispanic Population in the State of Minnesota = 2.9%
Disproportionate Share Threshold = 12.9%

NOTE: A disproportionate share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.

Data Source: Census 2000, ESRI Datasets, 2000 TIGER Data, USGS

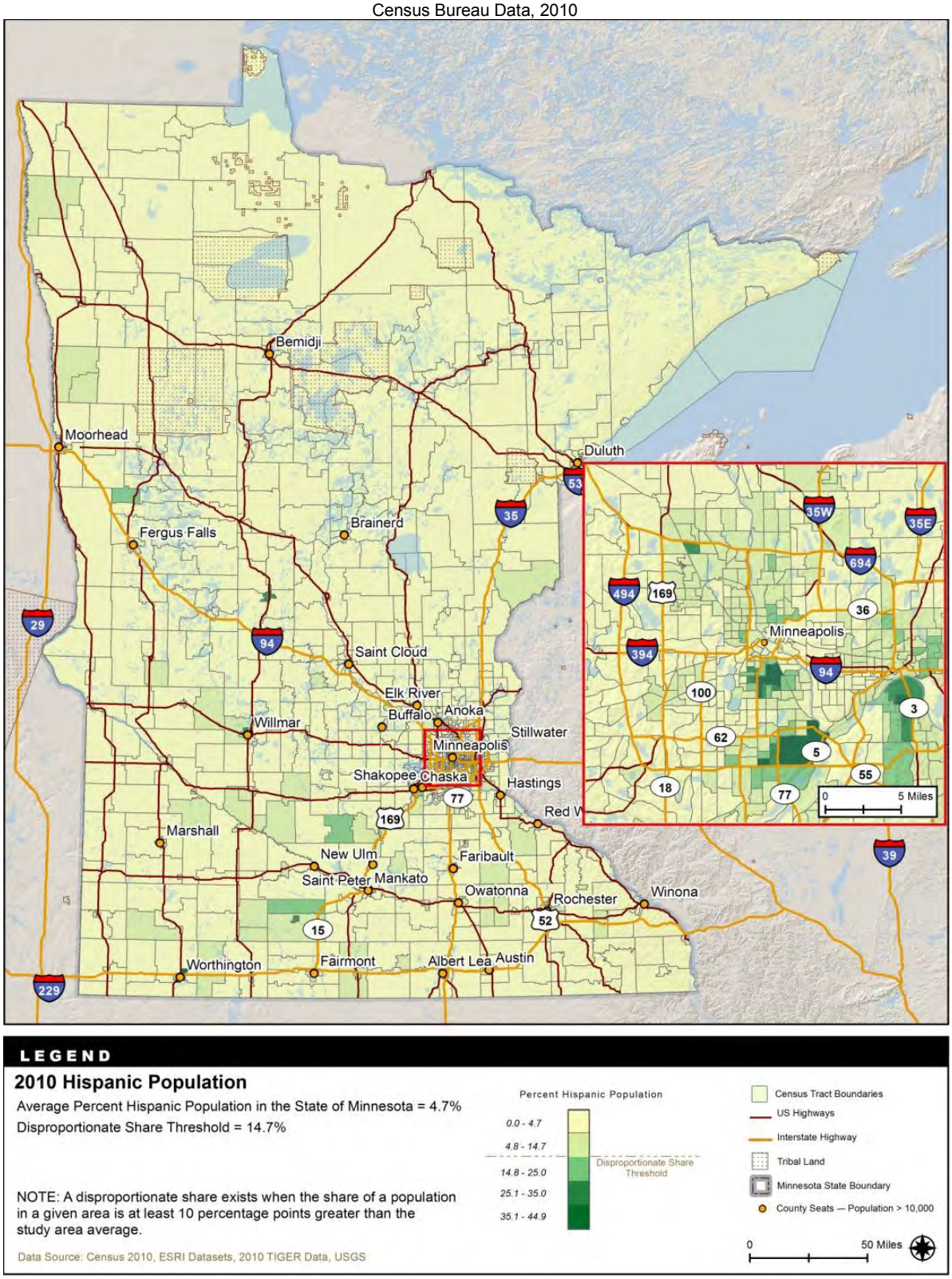
Percent Hispanic Population
0.0 - 2.9
3.0 - 12.9
13.0 - 20.0
20.1 - 30.0
30.1 - 41.5
Disproportionate Share Threshold

Census Tract Boundaries
US Highways
Interstate Highway
Tribal Land
Minnesota State Boundary
County Seats — Population > 10,000

0 50 Miles

Map II.8

Percent Hispanic Population by Census Tract
State of Minnesota
Census Bureau Data, 2010



DISABILITY STATUS

Disability is defined by the Census Bureau as a lasting physical, mental, or emotional condition that makes it difficult for a person to conduct daily activities of living or impedes him or her from being able to go outside the home alone or to work.

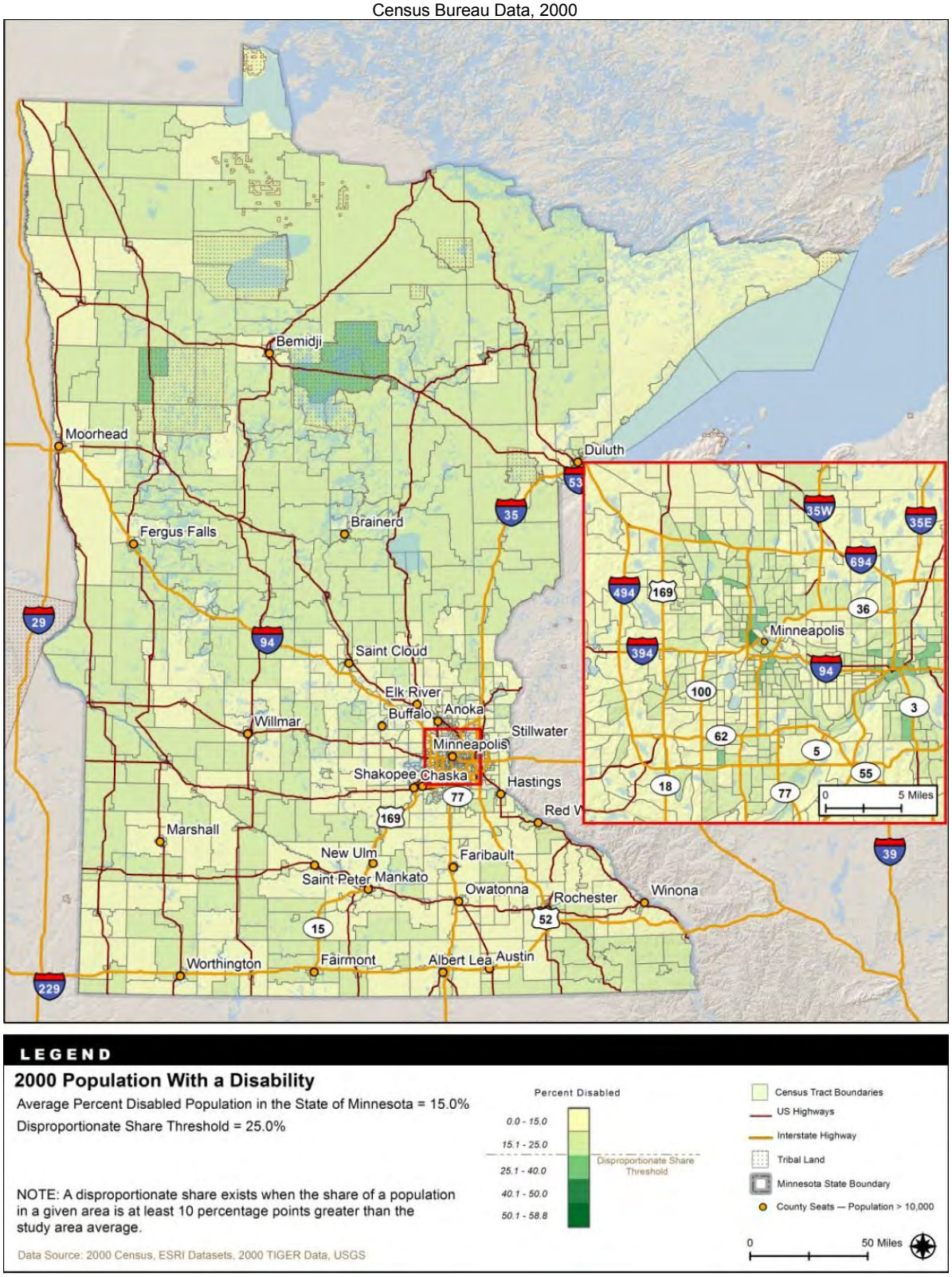
For all persons aged 5 years or older, the State of Minnesota had a disability rate of 15 percent in 2000, which was lower than the 19 percent national rate at that time. This disability rate represented 679,236 persons living with a disability in the state, including 43,780 persons between the ages of 5 and 15 and 204,204 persons over the age of 65. One-year ACS estimates for 2009 showed that the disability rate decreased to just below 10 percent, but the share of the youngest and oldest age groups with disabilities increased. These data are displayed below in Table II.5.

Table II.5
Persons with Disability by Age
State of Minnesota
Census Bureau Data

Age	2000 Census		2009 One-Year Estimate	
	Disabled	% of Total	Disabled	% of Total
5 to 15	43,780	6.4%	44,795	8.7%
16 to 64	431,252	63.5%	269,847	52.4%
Over 65	204,204	30.1%	200,651	38.9%
Total	**679,236**	**100%**	**515,293**	**100%**
Disability Rate	15.0%		9.9%	

Geographic distribution of the disabled population in the State of Minnesota, as of the 2000 census, is presented on the following page in Map II.9. This map shows that a few census tracts held disproportionate shares of the disabled population in and around Minneapolis and St. Paul as well as around the tribal lands in the northern part of the state. The few most highly concentrated tracts showed a share of nearly 60 percent. Many tracts across the state had disabled populations above the average but below the disproportionate share threshold.

Map II.9
Disabled Population by Census Tract
State of Minnesota
Census Bureau Data, 2000



ECONOMICS

LABOR FORCE AND EMPLOYMENT

Data regarding the labor force, defined as the total number of persons working or looking for work, and employment, or the number of persons working, as gathered from the Bureau of Labor Statistics, are presented below in Diagram II.1. As shown, labor force and employment figures in Minnesota showed moderate to mild increases through 2008. However, in 2009, the labor force increased while employment figures dropped substantially.

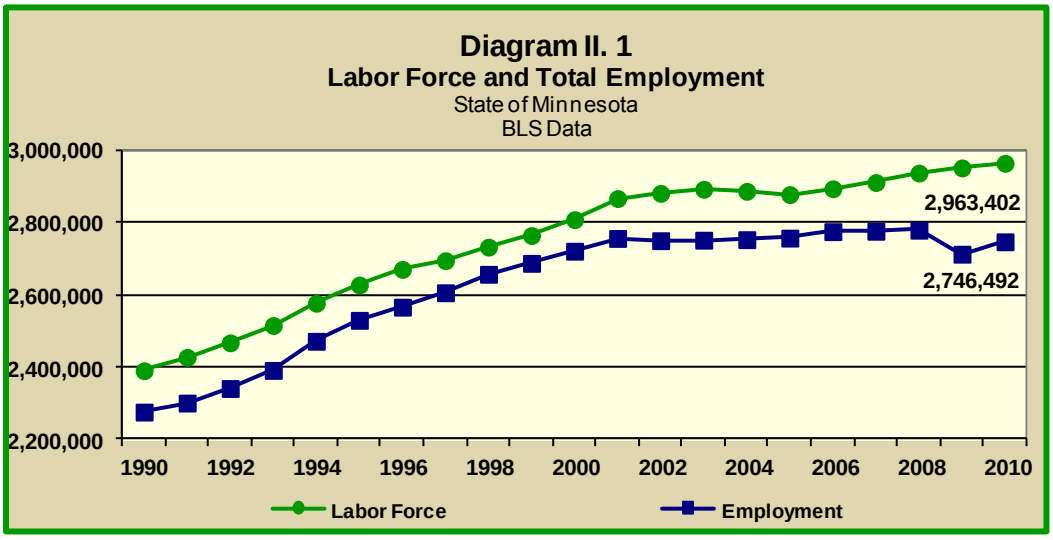
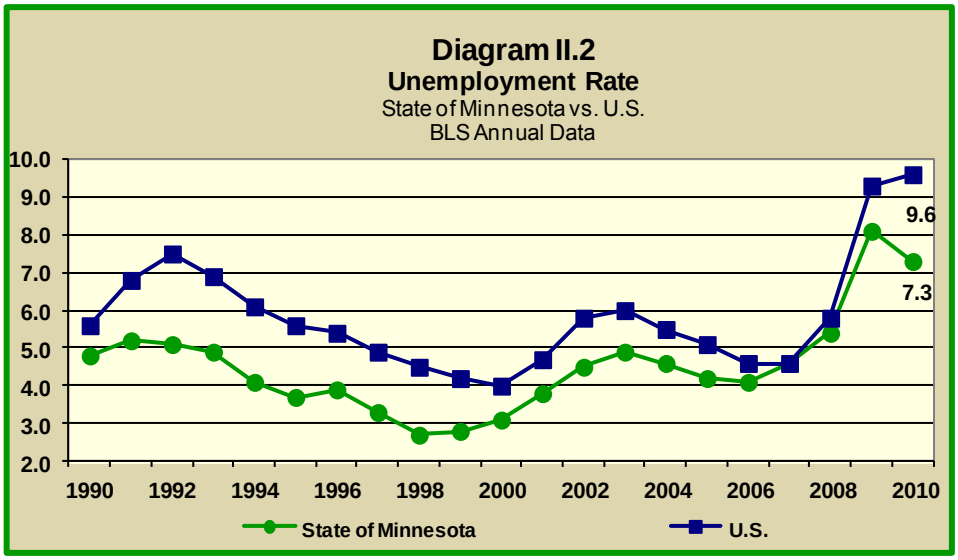
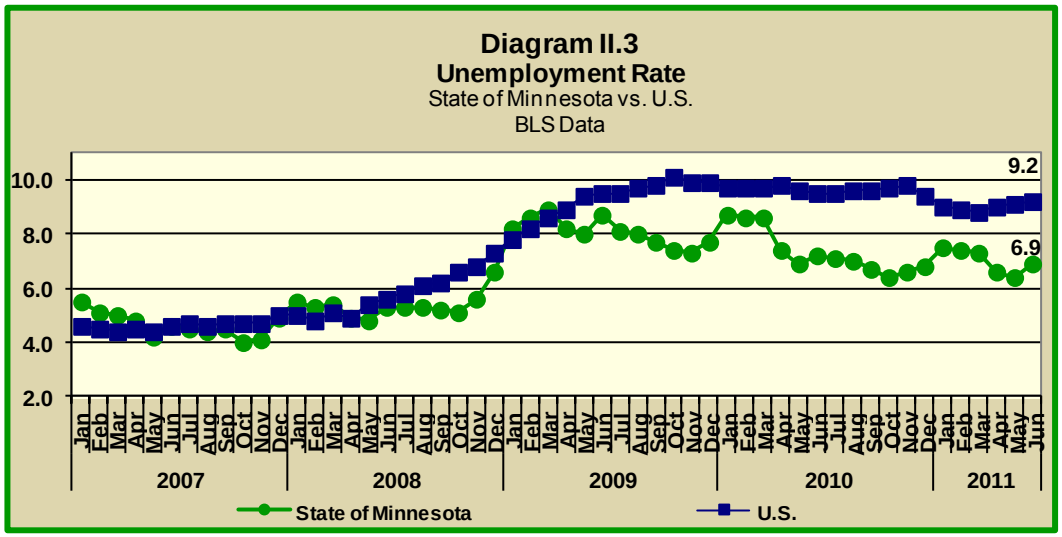


Diagram II.2, below, presents the yearly unemployment rate in the State of Minnesota compared to the U.S. from 1990 through 2010. As a result of the fluctuating labor force and employment rates, the statewide unemployment rate rose to over 8 percent in 2009 but fell to 7.3 percent in 2010. However, both of these rates were below respective national figures.



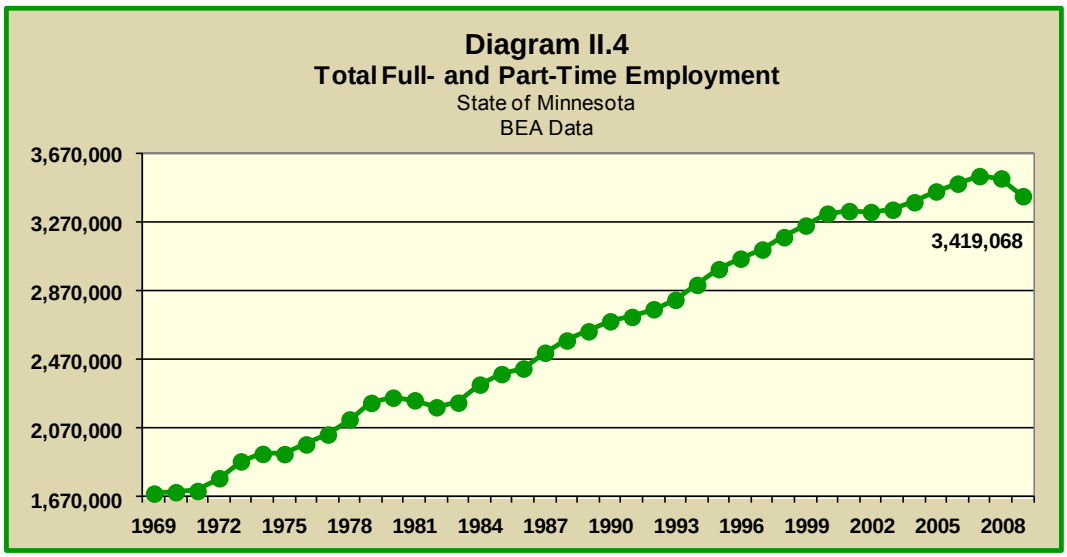
More recent monthly unemployment rate data are presented below in Diagram II.3. As shown, the unemployment rate in the State of Minnesota showed marked seasonal fluctuations between 6 and 10 percent in 2009 and 2010. By June 2011, Minnesota's unemployment rate stood at 6.9 percent compared to the national rate of 9.2 percent.



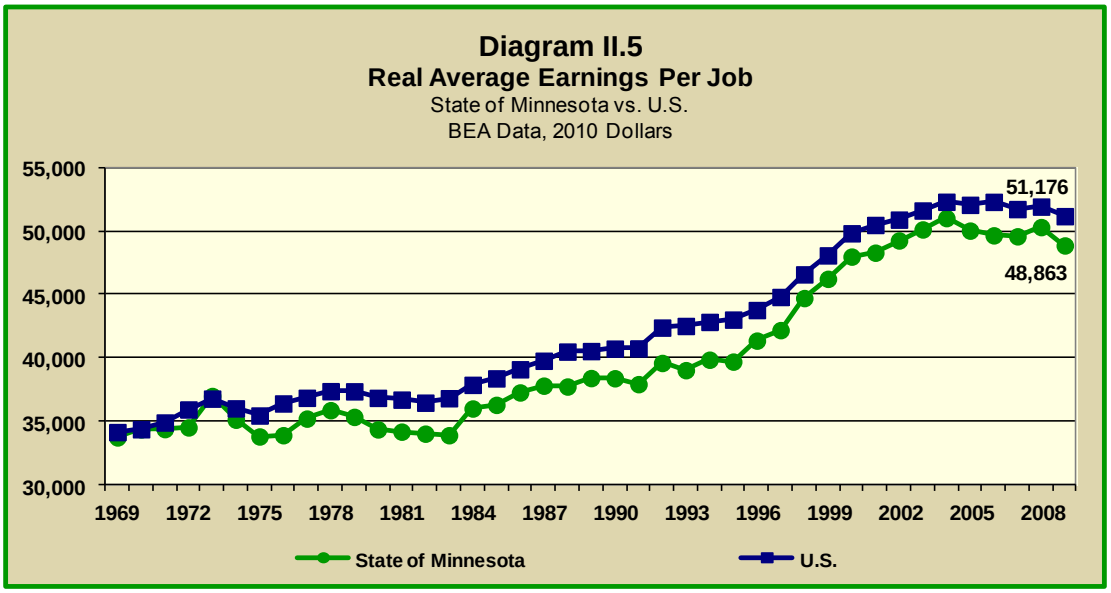
FULL- AND PART-TIME EMPLOYMENT AND EARNINGS

The Bureau of Economic Analysis (BEA) provides an alternate view of employment: a count of both full- and part-time jobs. Thus, a person working more than one job can be counted more than once. As shown in Diagram II.4, below, the total number of full- and part-time

jobs in the State of Minnesota increased substantially from 1969 through 2009 by nearly 1.8 million jobs.[6]

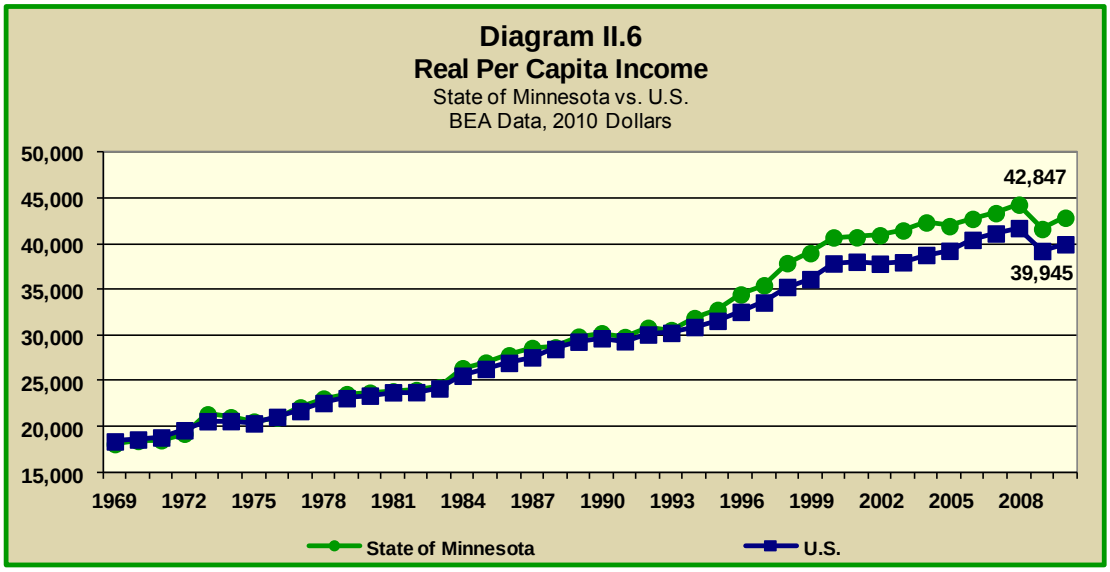


When total earnings from employment is divided by the number of jobs and then deflated to remove the effects of inflation, average real earnings per job is determined. Diagram II.5, below, shows that average earnings per job in the State of Minnesota rose from under $35,000 to $48,863 by 2009 but were stagnant from 2003 through 2009. Average earnings per job in the state remained just below the national average during this time period.



[6] Data are, in part, from administrative records, and the most current BEA data available were through 2010.

Another gauge of economic health involves comparing the total of all forms of income: wages earned, transfer payments, and property income such as dividends, interest, and rents. When these data are added together and divided by population, per capita income is determined. Diagram II.6, below, compares real per capita income in Minnesota to the U.S. from 1969 through 2010. This diagram shows that per capita income in the state has been higher than the nation since roughly the mid 1980s and was nearly $3,000 higher in 2010.



HOUSEHOLD INCOME

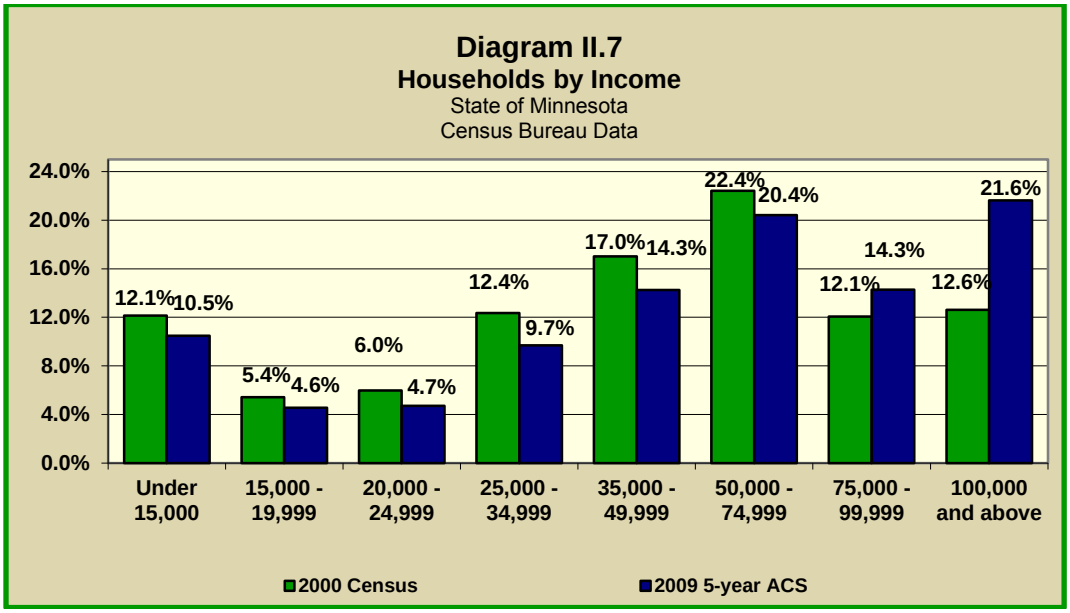
Table II.6, below, presents the number of households in the State of Minnesota by income range, as derived from the 2000 census count and 2009 ACS estimates. In 2000, 12.1 percent of households had incomes under $15,000, and an additional 11.4 percent of households had incomes between $15,000 and $24,999. More recent ACS data showed that the percentage of households with incomes of $75,000 and above increased from 24.7 percent in the 2000 census data to 35.9 percent in 2009 ACS data. This finding suggests that incomes in the state are improving over time.

Table II.6
Households by Income
State of Minnesota
Census Bureau Data

Income	2000 Census		2009 Five-Year ACS	
	Households	% of Total	Households	% of Total
Under 15,000	230,160	12.1%	216,202	10.5%
15,000 - 19,999	103,002	5.4%	93,829	4.6%
20,000 - 24,999	113,087	6.0%	97,026	4.7%
25,000 - 34,999	234,300	12.4%	199,601	9.7%
35,000 - 49,999	322,529	17.0%	294,028	14.3%
50,000 - 74,999	424,867	22.4%	420,891	20.4%
75,000 - 99,999	228,834	12.1%	294,413	14.3%

100,000 and Above	239,430	12.6%	445,892	21.6%
Total	**1,896,209**	**100.0%**	**2,061,882**	**100.0%**

Diagram II.7, below, presents these income distributions graphically and further demonstrates the shift from lower to higher income households over time.



POVERTY

The Census Bureau uses a set of income thresholds that vary by family size and composition to determine poverty status. If a family's total income is less than the threshold for its size, then that family, and every individual in it, is considered poor. The poverty thresholds do not vary geographically, but they are updated annually for inflation using the Consumer Price Index. The official poverty definition counts income before taxes and does not include capital gains and non-cash benefits such as public housing, Medicaid, and food stamps. Further, poverty is not defined for persons in military barracks, institutional group quarters, or for unrelated individuals under age 15 such as foster children.

In the State of Minnesota, the poverty rate in 2000 was 7.9 percent, with 380,476 persons considered to be living in poverty, as noted below in Table II.7. More than 41,400 children aged 5 and under were counted as living in poverty at that time, in addition to 45,405 persons aged 65 or older. The 2009 ACS data showed that poverty in Minnesota increased to 10 percent, and poverty rates increased for persons aged 5 years or younger as well as for persons aged 18 to 64.

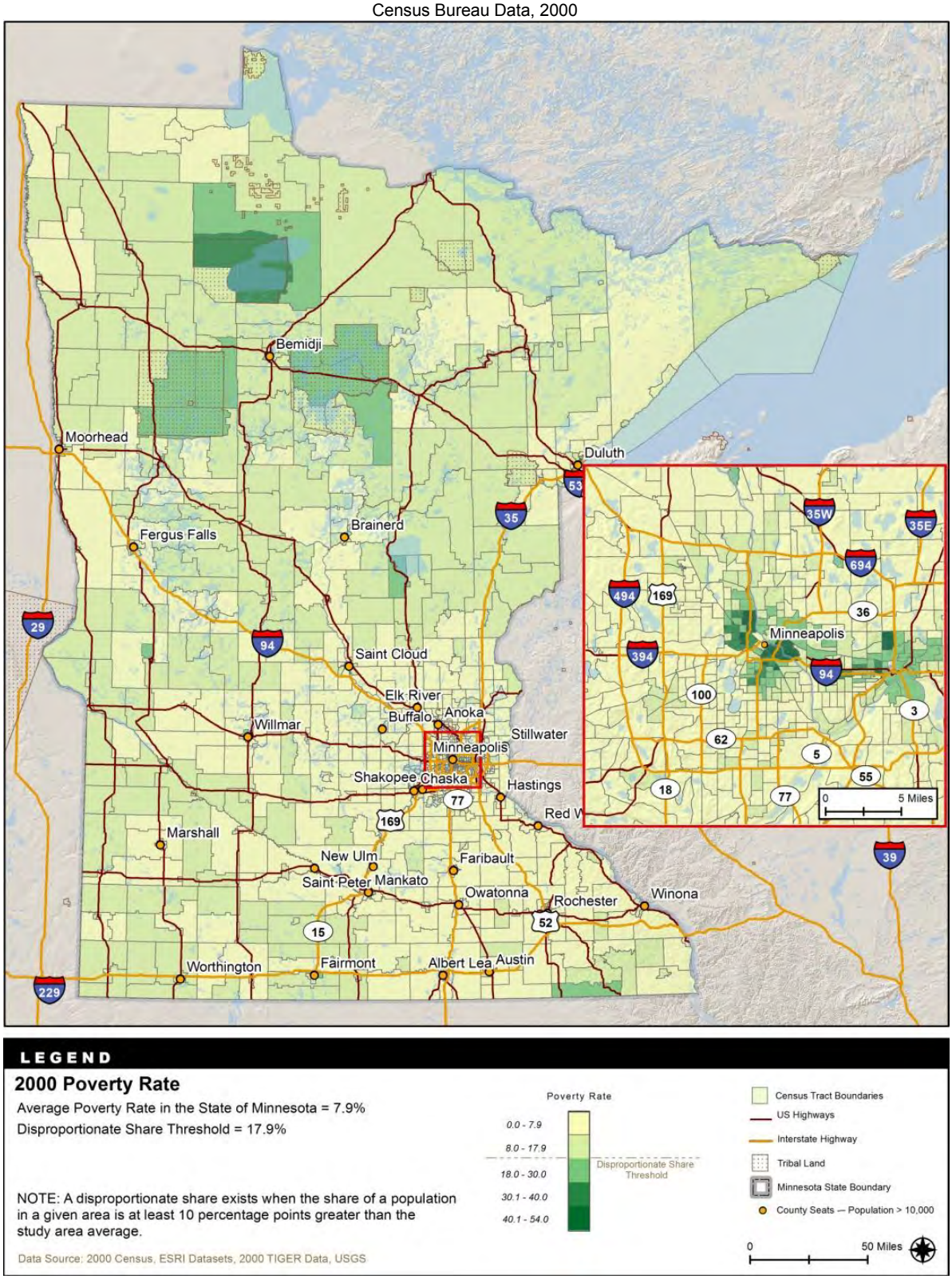
Table II.7
Persons in Poverty by Age
State of Minnesota
Census Bureau Data

Age	2000 Census		2009 Five-Year ACS	
	Persons in Poverty	% of Total	Persons in Poverty	% of Total
5 and Under	41,403	10.9%	60,268	11.9%
6 to 17	80,288	21.1%	94,494	18.7%
18 to 64	213,380	56.1%	301,241	59.5%
65 and Older	45,405	11.9%	50,230	9.9%
Total	**380,476**	**100.0%**	**506,233**	**100.0%**
Poverty Rate	7.9%	.	10.0%	.

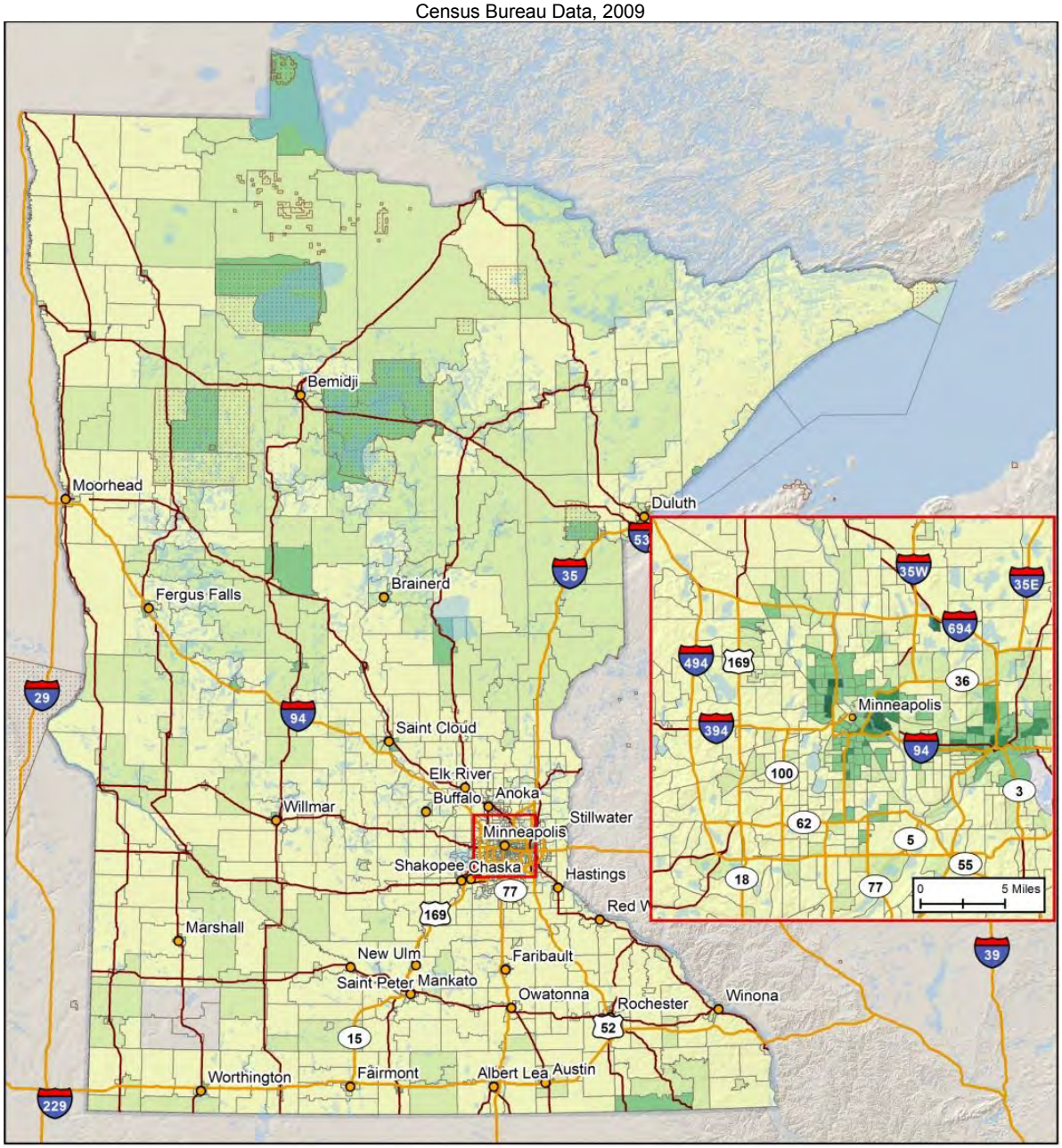
Poverty was not spread evenly throughout the state, as some census tracts had much higher rates of poverty than others. Map II.10, on the following page, presents the 2000 poverty rate geographically. Census tracts that had a disproportionate share of persons living in poverty were areas where the poverty rate was greater than 17.9 percent. At that time, the highest levels of poverty were seen in the Twin Cities metro region, in the central northern areas of the state, and in and around some tribal lands.

By 2009, while several tracts in the northern and metro areas of the state had become less concentrated, the statewide average poverty rate as well as the maximum percentage of persons per tract in poverty increased. Map II.11, on page 39, presents poverty data for Minnesota as derived from 2005 through 2009 ACS data averages and shows that poverty was less concentrated in some tracts. However, an increased number of tracts showed a disproportionate share of poverty rates in excess of 20 percent.

Map II.10
Poverty Rate by Census Tract
State of Minnesota
Census Bureau Data, 2000



Map II.11
Poverty Rate by Census Tract
State of Minnesota
Census Bureau Data, 2009



LEGEND

2005-2009 Poverty Rate

Average Poverty Rate in the State of Minnesota = 10.0%
Disproportionate Share Threshold = 20.0%

NOTE: A disproportionate share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.

Data Source: 2009 ACS, ESRI Datasets, 2000 TIGER Data, USGS

Poverty Rate
0.0 - 10.0
10.1 - 20.0
20.1 - 40.0
40.1 - 60.0
60.1 - 75.2
Disproportionate Share Threshold

No Data
US Highways
Interstate Highway
Tribal Land
Minnesota State Boundary
County Seats — Population > 10,000

0 50 Miles

HOUSING

Data regarding the number of housing units counted in the State of Minnesota are presented in Table II.8, at right. In total, the number of housing units increased by 13.6 percent between 2000 and 2010, from nearly 2.1 million to over 2.3 million units. However, during this time, the population of Minnesota increased by only 7.8 percent, which suggests that housing production significantly outpaced population growth.

Table II.8
Housing Units
State of Minnesota
Census Bureau Data

Year	Housing Units
2000 Census	2,065,946
2010 Census	2,347,201
% Change	**13.6%**

Table II.9, below, shows that, as of 2000, 393,621 units, or 20.8 percent of all units counted in the state, were built in 1939 or earlier. The 2009 ACS data showed that the share of housing units constructed during that time period fell by 1.9 percent, and all other housing built from 1940 through 1999 also showed decreases in share due to the construction of units built from 2000 onward. More than 206,000 units were constructed between 2000 and 2004, and 60,400 units were built in 2005 or later.

Table II.9
Households by Vintage
State of Minnesota
Census Bureau Data

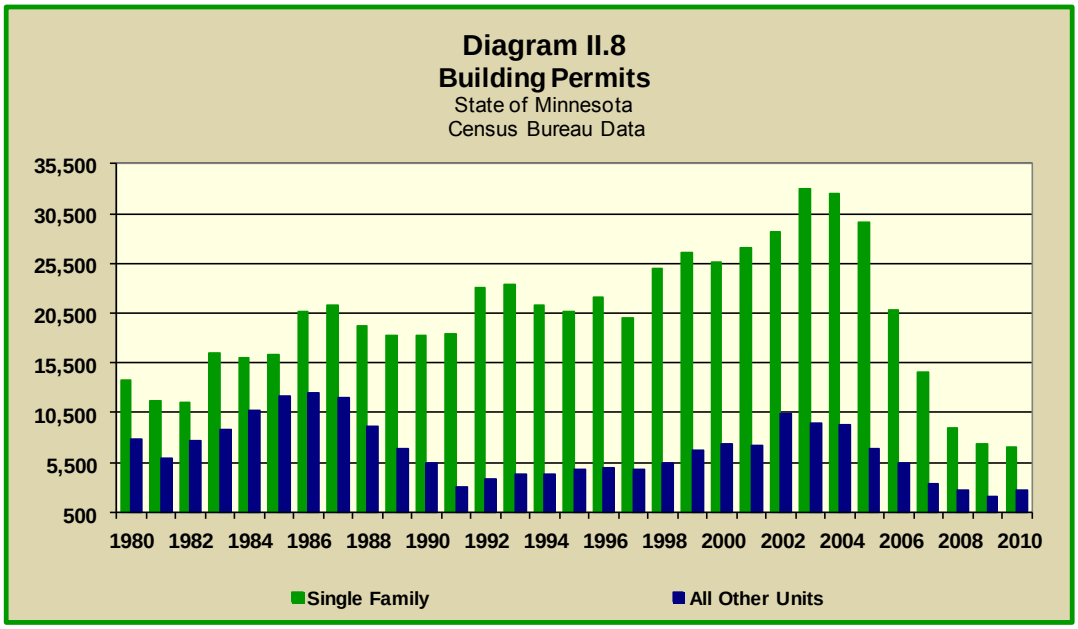
Vintage	2000 Census		2009 Five-Year ACS	
	Population	% of Total	Population	% of Total
1939 or Earlier	393,621	20.8%	433,881	18.9%
1940 to 1949	118,809	6.3%	120,990	5.3%
1950 to 1959	230,612	12.2%	248,881	10.8%
1960 to 1969	225,015	11.9%	232,178	10.1%
1970 to 1979	347,987	18.4%	378,335	16.4%
1980 to 1989	276,805	14.6%	304,489	13.2%
1990 to 1999	302,278	16.0%	315,582	13.7%
2000 to 2004	.	.	206,571	9.0%
2005 or Later	.	.	60,400	2.6%
Total	**1,895,127**	**100.0%**	**2,301,307**	**100.0%**

The number of building permits and valuation of constructed units from 1980 through 2010 is presented on the following page in Table II.10. The number of permits issued for single-family unit construction in the State of Minnesota was highest in the early 2000s, with a peak of 32,929 units in 2003. The valuation of single-family units was highest in 2010, at $216,953.

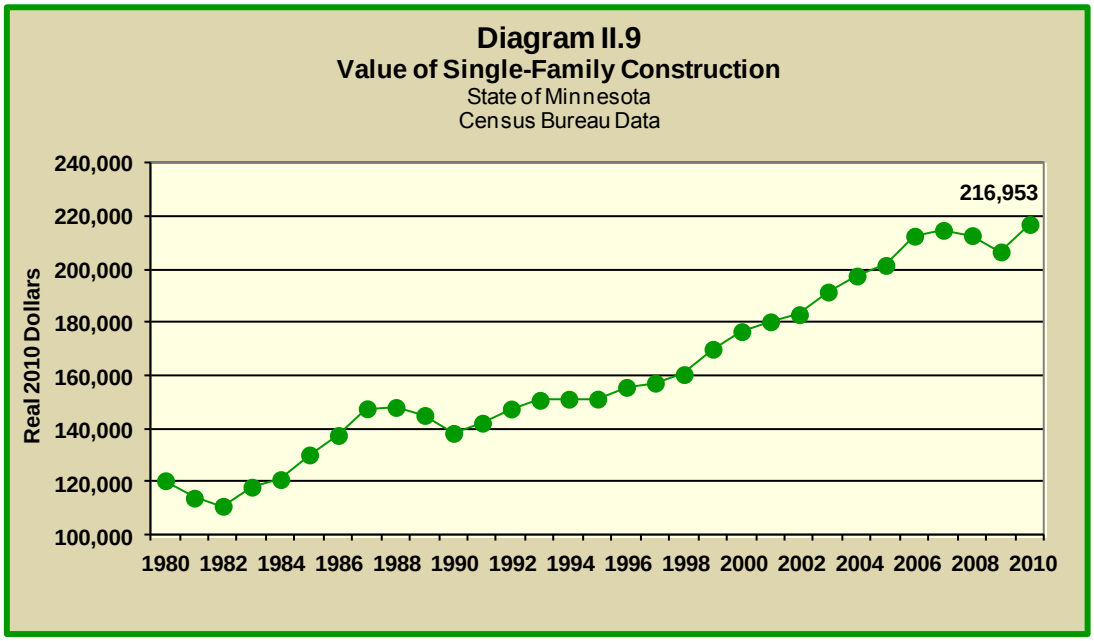
Table II.10
Building Permits and Valuation
State of Minnesota
Census Bureau Data

Year	Authorized Construction in Permit Issuing Areas					Per Unit Valuation Real 2010 Dollars
	Single-Family Units	Duplex Units	Tri- and Four-Plex Units	Multifamily Units	Total Units	Single-Family Unit $
1980	13,766	1,258	934	5,705	21,663	120,492
1981	11,757	1,026	1,243	3,576	17,602	113,932
1982	11,468	504	1,168	6,059	19,199	110,880
1983	16,550	640	1,589	6,503	25,282	118,067
1984	16,042	530	1,256	8,870	26,698	120,924
1985	16,382	486	791	10,952	28,611	130,195
1986	20,694	514	725	11,282	33,215	137,529
1987	21,333	278	700	11,065	33,376	147,576
1988	19,237	288	533	8,322	28,380	148,078
1989	18,300	222	376	6,231	25,129	145,071
1990	18,282	160	273	4,998	23,713	138,328
1991	18,376	186	361	2,509	21,432	142,156
1992	23,038	270	235	3,337	26,880	147,501
1993	23,355	252	285	3,774	27,666	150,771
1994	21,339	312	497	3,482	25,630	151,182
1995	20,675	324	709	3,786	25,494	151,214
1996	22,096	376	774	3,808	27,054	155,644
1997	20,069	634	997	3,209	24,909	157,220
1998	25,015	746	931	3,755	30,447	160,451
1999	26,667	804	836	5,037	33,344	169,977
2000	25,608	730	915	5,754	33,007	176,614
2001	27,037	596	917	5,711	34,261	180,312
2002	28,754	636	942	8,840	39,172	183,017
2003	32,929	654	992	7,785	42,360	191,515
2004	32,587	478	778	8,007	41,850	197,544
2005	29,579	312	571	6,060	36,522	201,542
2006	20,901	232	281	4,938	26,352	212,533
2007	14,513	108	258	3,056	17,935	214,740
2008	8,912	110	140	2,393	11,555	212,767
2009	7,318	112	129	1,870	9,429	206,616
2010	7,054	70	193	2,524	9,841	216,953

Diagram II.8, on the following page, compares the permit totals from single-family units and all other unit types over the 30-year time period. The diagram clearly shows that the number of permitted single-family units significantly outpaced the production of all other units, which included duplexes, tri- and four-plex units, and multifamily units.



The change in the value of single-family permits issued each year in the State of Minnesota from 1980 through 2010 are presented below in Diagram II.9. While some fluctuation in values was seen in the early 1980s, the 1990s, and the late 2000s, the 2010 figure reached an all-time high of $216,953.



CHARACTERISTICS OF THE HOUSING STOCK

Of the 2,065,946 housing units reported in the State of Minnesota in the 2000 census, 73 percent were single-family units. An additional 16.9 percent of units were counted as apartments, 4.5 percent were mobile homes, and 3 percent were duplexes. ACS data for 2009 represented a 2005 to 2009 data average, which showed that the share of single-family units increased to 74.9 percent, while the shares of all other unit types decreased. These data are presented below in Table II.11.

Table II.11
Housing Units by Unit Type
State of Minnesota
Census Bureau Data

Unit Type	2000 Census		2009 Five-Year ACS	
	Population	% of Total	Population	% of Total
Single-Family Unit	1,507,378	73.0%	1,723,048	74.9%
Duplex	62,137	3.0%	56,513	2.5%
Tri- or Four-Plex	48,235	2.3%	48,784	2.1%
Apartment	349,302	16.9%	384,314	16.7%
Mobile Home	93,618	4.5%	88,125	3.8%
Boat, RV, Van, Etc.	5,276	0.3%	523	0.0%
Total	**2,065,946**	**100.0%**	**2,301,307**	**100.0%**

Housing units can also be examined by tenure status. Between 2000 and 2010, the number of occupied housing units increased by 10.1 percent, from nearly 1.9 million to almost 2.1 million units. A comparison of owner-occupied and renter-occupied units showed a slight shift to a greater share of renter-occupied units over the time period, with the rate of homeownership slipping from 74.5 percent to 73 percent. The number of vacant units showed a marked increase of 52.2 percent between 2000 and 2010. These data are presented below in Table II.12.

Table II.12
Housing Units by Tenure
State of Minnesota
Census Bureau Data

Tenure	2000 Census		2010 Census		00 - 10 % Change
	Population	% of Total	Population	% of Total	
Occupied Housing Units	1,895,127	91.7%	2,087,227	88.9%	10.1%
Owner-Occupied	1,412,724	74.5%	1,523,859	73.0%	7.9%
Renter-Occupied	482,403	25.5%	563,368	27.0%	16.8%
Vacant Housing Units	170,819	8.3%	259,974	11.1%	52.2%
Total Housing Units	**2,065,946**	**100.0%**	**2,347,201**	**100.0%**	**13.6%**

The geographic dispersal of owner-occupied units in the State of Minnesota is presented on the following page in Map II.12. The average percentage of owner-occupied housing was 73 percent in 2010, which makes the disproportionate share 83 percent. Concentrations of owner-occupied housing above the disproportionate share were spread throughout the state, although they were seen less in the western part of the state. The share of owner-occupied housing units was generally lower than the average in the Minneapolis/St. Paul area and on some of the tribal lands in the northern part of the state.

Conversely, the average rate of renter-occupied housing per tract was 27 percent. Map II.13, on page 46, shows the distribution of renter-occupied housing within the State of Minnesota. Much of the heaviest distribution of renter households in the state was located in the Twin Cities metro area as well as in a few of the tribal lands in the northern central part of the state. Rates above 80 percent were also seen in tracts in Duluth, Saint Cloud, and Rochester, although the small scale of the map makes them difficult to display.

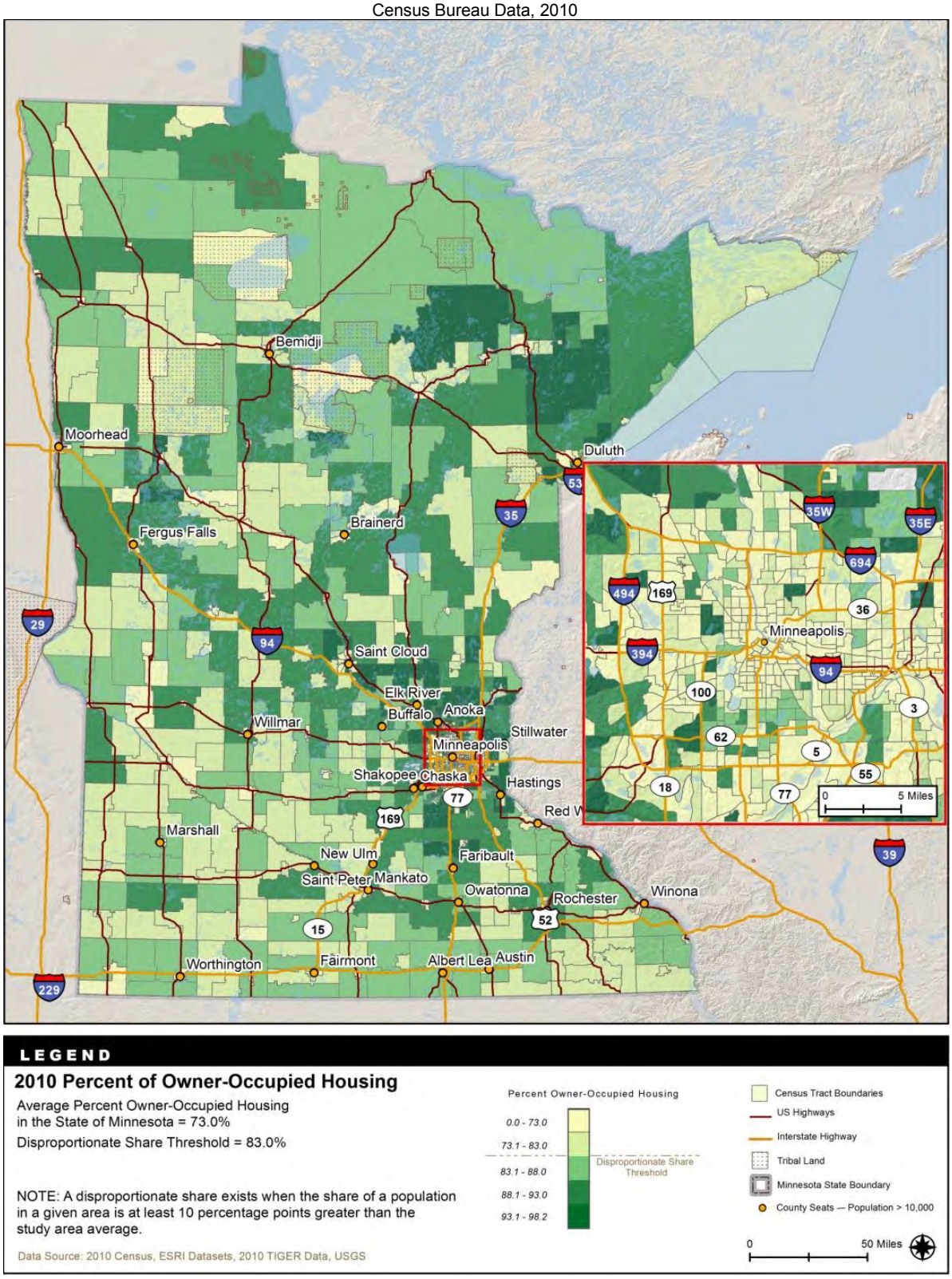
VACANT HOUSING UNITS

As shown below in Table II.13, at the time of the 2000 census, the vacant housing stock represented 170,819 units, and by 2010, this figure represented 259,974 units. Many of the vacant units in 2000 and 2010 were for sale or rent or for seasonal, recreational, or occasional use. The largest increase was seen in the number of units labeled as "other vacant." This type of unit showed an increase of 154.6 percent over the decade, from 16,074 to 40,922 units. "Other vacant" units generally include units that are not for sale or rent, which may contribute to blight if grouped in close proximity.

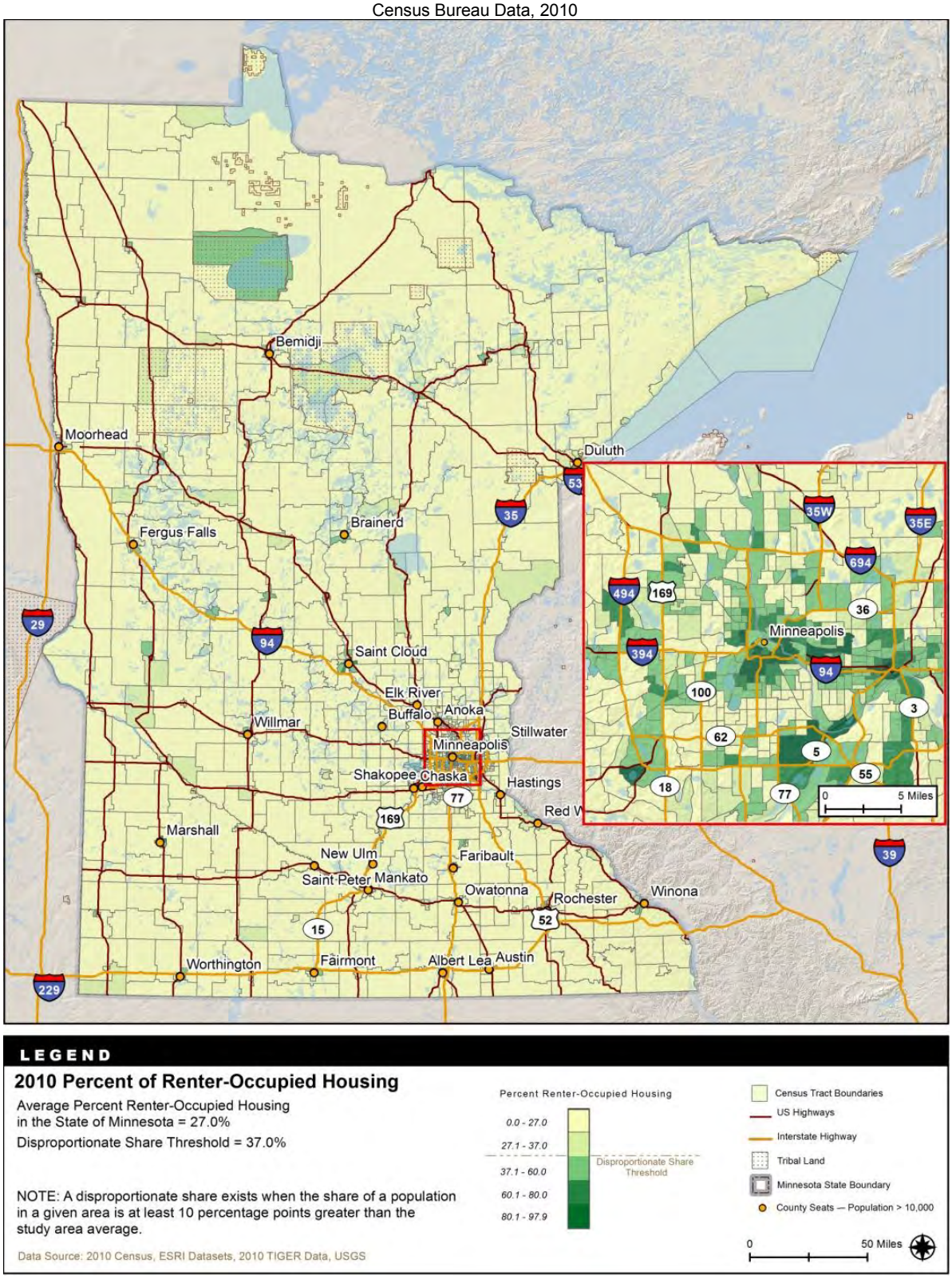
Table II.13
Disposition of Vacant Housing Units
State of Minnesota
Census Bureau Data

Disposition	2000 Census		2010 Census		00 - 10 % Change
	Population	% of Total	Population	% of Total	
For Rent	20,870	12.2%	48,091	18.5%	130.4%
For Sale	16,013	9.4%	30,726	11.8%	91.9%
Rented or Sold, Not Occupied	8,712	5.1%	9,430	3.6%	8.2%
For Seasonal, Recreational, or Occasional Use	108,490	63.5%	130,471	50.2%	20.3%
For Migrant Workers	660	0.4%	334	0.1%	-49.4%
Other Vacant	16,074	9.4%	40,922	15.7%	154.6%
Total	**170,819**	**100.0%**	**259,974**	**100.0%**	**52.2%**

Map II.12
Owner-Occupied Housing Units
State of Minnesota
Census Bureau Data, 2010



Map II.13
Renter-Occupied Housing Units
State of Minnesota
Census Bureau Data, 2010



The number of persons per household, as counted in the state at the time of the 2000 and 2010 censuses, is presented below in Table II.14. As shown, in 2000, more than 60 percent of households represented one- or two-person households, nearly 30 percent represented three- or four-person households, and the remainder represented households with five persons or more. Similar findings were seen in 2010, although there was a slight decrease in the number of five-person households.

Table II.14
Persons Per Household
State of Minnesota
Census Bureau Data

Persons	2000 Census		2010 Census		00 - 10 % Change
	Population	% of Total	Population	% of Total	
One Person	509,419	26.9%	584,008	28.0%	14.6%
Two Person	641,733	33.9%	724,386	34.7%	12.9%
Three Person	283,517	15.0%	307,794	14.7%	8.6%
Four Person	273,762	14.4%	274,621	13.2%	0.3%
Five Person	125,401	6.6%	123,002	5.9%	-1.9%
Six Person	39,369	2.1%	44,258	2.1%	12.4%
Seven Person	21,926	1.2%	29,158	1.4%	33.0%
Total	**1,895,127**	**100.0%**	**2,087,227**	**100.0%**	**10.1%**

HOUSING PROBLEMS

While the 2000 census did not report significant details regarding the physical condition of housing units, some information can be derived from the one in six sample, which is also called SF3 data.[7] These data relate to overcrowding, incomplete plumbing or kitchen facilities, and cost burdens. While these data were not collected during the course of the 2010 census, data were available for comparison from the 2005 to 2009 ACS averages.

Overcrowding is defined as having one to 1.5 persons per room per residence, with severe overcrowding defined as having more than 1.5 persons per room.

At the time of the 2000 census, 30,961 households, or 1.6 percent, were overcrowded, and another 24,065 units, or 1.3 percent of households, were severely overcrowded, as shown on the following page in Table II.15. This housing problem was far more prevalent in renter households compared to owner households. Similar figures were found in the more recent ACS data, although the share of overcrowded and severely overcrowded households improved in both renter and owner situations.

[7] Summary File 3 (SF3) consists of 813 detailed tables of 2000 census social, economic, and housing characteristics compiled from a sample of approximately 19 million housing units (about one in six households) that received the 2000 census long-form questionnaire. Source: http://www.census.gov/Press-Release/www/2002/sumfile3.html. These sample data include sampling error and may not sum precisely to the 100 percent sample typically presented in the 2000 census.

Table II.15
Overcrowding and Severe Overcrowding
State of Minnesota
Census Bureau Data

Census	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	%	Households	%	Households	%	
Owner							
2000 Census	1,389,409	98.3%	15,559	1.1%	7,756	0.5%	1,412,724
2009 Five-Year ACS	1,529,292	99.1%	11,346	0.7%	2,786	0.2%	1,543,424
Renter							
2000 Census	450,692	93.4%	15,402	3.2%	16,309	3.4%	482,403
2009 Five-Year ACS	500,154	96.5%	13,402	2.6%	4,902	0.9%	518,458
Total							
2000 Census	1,840,101	97.1%	30,961	1.6%	24,065	1.3%	1,895,127
2009 Five-Year ACS	2,029,446	98.4%	24,748	1.2%	7,688	0.4%	2,061,882

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.

At the time of the 2000 census, a total of 35,220 units, or 1.7 percent of all households in the state, were lacking complete plumbing facilities, as shown below in Table II.16. The 2005 through 2009 ACS data averages showed that the percentage of units with this housing problem remained unchanged.

Table II.16
Housing Units with Incomplete Plumbing Facilities
State of Minnesota
Census Bureau Data

Facilities	2000 Census Population	2009 Five-Year ACS Population
Plumbing Facilities		
Complete Plumbing Facilities	2,030,726	2,262,006
Lacking Complete Plumbing Facilities	35,220	39,301
Total Households	**2,065,946**	**2,301,307**
Percent Lacking	1.7%	1.7%

Table II.17, on the following page, shows the number of housing units with incomplete kitchen facilities in the state. In 2000, there was a smaller percentage of units with incomplete kitchen facilities compared to incomplete plumbing facilities, with 1.6 percent of total units counted by this classification. ACS data averages showed that the percentage of units with incomplete kitchen facilities increased slightly in 2010, to 1.7 percent.

Table II.17
Housing Units with Incomplete Kitchen Facilities
State of Minnesota
Census Bureau Data

Facilities	2000 Census Population	2009 Five-Year ACS Population
Kitchen Facilities		
Complete Kitchen Facilities	2,033,100	2,261,567
Lacking Complete Kitchen Facilities	32,846	39,740
Total Households	**2,065,946**	**2,301,307**
Percent Lacking	1.6%	1.7%

The third type of housing problem reported in the 2000 census was cost burden, which is defined as gross housing costs that range from 30.1 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 electricity or natural gas energy charges.

Table II.18. below, shows that 14.2 percent of households had a cost burden and 7.9 percent of households had a severe cost burden in 2000. These figures were much lower than the national average of 20.8 percent and 19.1 percent, respectively, at that time. More than 14 percent of homeowners with a mortgage had a cost burden and 5.5 percent had a severe cost burden, while 19.6 percent of renters had a cost burden and 15.4 percent had a severe cost burden. ACS data averages showed that the overall percentage of cost burden or severe cost burden increased to 19.7 and 12.4 percent, respectively. The rates also increased for subcategories. For example, the rate of cost burden for owners with a mortgage increased to 22.9 percent, and the rate of severe cost burden for owners with a mortgage increased to 10.7 percent. For renters, the cost burden rate rose to 22.6 percent, and the severe cost burden rate rose to 22.4 percent.

Table II.18
Cost Burden and Severe Cost Burden by Tenure
State of Minnesota
Census Bureau Data

Census	Less Than 30%		30.1% - 50%		Above 50%		Not Computed		Total
	Households	%	Households	%	Households	%	Households	%	
Owner With a Mortgage									
2000 Census	663,238	80.0%	118,725	14.3%	45,292	5.5%	1,826	0.2%	829,081
2009 Five-Year ACS	728,901	66.2%	252,103	22.9%	117,495	10.7%	2,524	0.2%	1,101,023
Owner Without a Mortgage									
2000 Census	264,711	91.8%	13,764	4.8%	7,430	2.6%	2,503	0.9%	288,408
2009 Five-Year ACS	380,942	86.1%	36,230	8.2%	22,875	5.2%	2,354	0.5%	442,401
Renter									

2000 Census	282,754	60.0%	92,463	19.6%	72,644	15.4%	23,605	5.0%	471,466
2009 Five-Year ACS	253,484	48.9%	117,422	22.6%	116,089	22.4%	31,463	6.1%	518,458
Total									
2000 Census	1,210,703	76.2%	224,952	14.2%	125,366	7.9%	27,934	1.8%	1,588,955
2009 Five-Year ACS	1,363,327	66.1%	405,755	19.7%	256,459	12.4%	36,341	1.8%	2,061,882

Persons with a severe cost burden are at risk of homelessness. For example, cost-burdened renters who experience one financial setback are likely to have to choose between rent and food or rent and healthcare for their families. Similarly, homeowners with a mortgage who have just one unforeseen financial constraint, such as temporary illness, divorce, or the loss of employment, may be forced to face foreclosure or bankruptcy. Furthermore, households that no longer have a mortgage yet still experience a severe cost burden may be unable to conduct periodic maintenance and repair of their homes and, in turn, contribute to a dilapidation and blight problem. All three of these situations should be of concern to policy makers and program managers.

SUMMARY

According to the Census Bureau, between 2000 and 2010, the population in the State of Minnesota grew from 4.9 million to 5.3 million persons, or by 7.8 percent. Data for population by age showed that the state's population slowly shifted to comprise more persons over the age of 55, although the age groups with the largest populations comprised persons aged 5 to 19 and 35 to 54.

Census Bureau data showed that, since 2000, the racial and ethnic composition of the state has also undergone some change. While the white population increased by only 2.8 percent between 2000 and 2010, most other racial and ethnic minorities showed double-digit increases in population change. In fact, black, Asian, and Hispanic groups all showed percent increases of more than 50 percent. Further evaluation of black, Asian, American Indian, and Hispanic population data in geographic terms showed slight to moderate increases in concentration of these groups over the past decade in census tracts throughout the state. As of 2000, other groups, including disabled persons, were also slightly concentrated in some areas of the state such as in the tribal lands and in the Twin Cities metro region.

Economic data for the State of Minnesota demonstrated the impact of the recent recession. Data from the Bureau of Labor Statistics showed that the labor force, defined as persons either working or looking for work, increased from around 2.8 million persons in 2000 to nearly 3 million in 2010. However, recently, employment figures have declined and, as a result, the unemployment rate increased to 7.3 percent by 2010 but stayed well below the 9.6 national rate seen at that time. Data from the Bureau of Economic Analysis showed that average earnings per job in the state decreased in 2009 and remained below national figures. In Minnesota, the poverty rate average for 2005 through 2009 was 10 percent, with

506,233 persons considered to be living in poverty. This group was concentrated primarily in the tribal lands in the state as well as in and around Minneapolis.

The number of housing units in the state increased by 13.6 percent, or from 2.1 million to 2.3 million units, between 2000 and 2010, with the majority of the housing stock built in 1939 or earlier. The number of building permits issued decreased since 2004, but the value of permitted single-family units showed an all-time high in 2010. Of the 2.1 million housing units reported in the state in the 2000 census, more than 70 percent were single-family units, and more recent data from the Census Bureau showed that this percentage increased to nearly 75 percent. In the most recent census, 88.9 percent of units were occupied, and, of these, 73 percent were owner-occupied and 27 percent were renter-occupied. Of the 170,819 unoccupied housing units counted in Minnesota in 2000, 16,074 were noted to be "other vacant" units, which are defined as units not available to the marketplace and can contribute to blighting influences. Census data from 2010 showed that this type of unit increased by nearly 155 percent, to 40,922 units.

At the time of the 2000 census, 1.6 percent of households were overcrowded and another 1.3 percent of households were severely overcrowded; this housing problem was more common in renter households than in owner households. In Minnesota, in 2000, 1.7 and 1.6 percent of all households were lacking complete plumbing or kitchen facilities, respectively. However, the number of incomplete facilities was not significantly changed in more recent data. Additionally, in 2000, 14.2 percent of households had a cost burden and 7.9 percent of households had a severe cost burden, and the 2009 American Community Survey (ACS) data showed that both of these percentages have increased since that time.

SECTION III. FAIR HOUSING LAW, STUDY, AND CASE REVIEW

As part of the AI process, existing fair housing laws, studies, cases, and other relevant materials were reviewed on a national and local scale. Results of this review are presented below.

FAIR HOUSING LAWS

FEDERAL FAIR HOUSING LAWS

A myriad of federal laws provide the backbone for fair housing regulations in the U.S. While some laws have been previously discussed in this report, a brief list of laws related to fair housing, as shown on HUD's website,[8] is presented below.

"*Fair Housing Act*. Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18), and handicap (disability)." [9]

Fair Housing Amendments Act of 1988. This amendment provides federal anti-discrimination protection for people with disabilities. It mandates that every multifamily apartment building containing four or more units and built for first occupancy after March 13, 1991, is subject to certain design and construction requirements. All ground floor units must comply with the requirements, and all units must be served by an elevator. [10]

"*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.

"*Rehabilitation Act of 1973*. Section 504 prohibits discrimination based on disability in any program or activity receiving federal financial assistance.

"*Housing and Community Development Act of 1974*. Section 109 prohibits discrimination on the basis of race, color, national origin, sex or religion in programs and activities receiving financial assistance from HUD's Community Development and Block Grant Program.

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[8] http://www.hud.gov/offices/fheo/FHLaws/index.cfm

[9] *Fair Housing Planning Guide*. U.S. Department of Housing and Urban Development. http://www.hud.gov/offices/fheo/images/fhpg.pdf

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

"*Americans with Disabilities Act of 1990*. Title II prohibits discrimination based on disability in programs, services, and activities provided or made available by public entities. HUD enforces Title II when it relates to state and local public housing, housing assistance and housing referrals.

"*Architectural Barriers Act of 1968*. The Architectural Barriers Act requires that buildings and facilities designed, constructed, altered, or leased with certain federal funds after September 1969 must be accessible to and useable by handicapped persons.

"*Age Discrimination Act of 1968*. The Age Discrimination Act prohibits discrimination on the basis of age in programs or activities receiving federal financial assistance.

"*Education Amendments Act of 1972*. Title IX prohibits discrimination on the basis of sex in education programs or activities that receive federal financial assistance."[11]

STATE FAIR HOUSING LAWS

Minnesota Human Rights Act. Prevents discrimination in housing on the bases of race, color, creed, religion, national origin, sex, sexual orientation, marital status, physical or mental disability, receipt of public assistance, and family status. The Act also prohibits retaliation against persons filing a discrimination charge or complaint or taking part in an investigation by a human rights organization.[12]

LOCAL FAIR HOUSING ORDINANCES

Several cities within the State of Minnesota have separate fair housing ordinances in addition to federal and state laws: Minneapolis, St. Paul, and Duluth.

Duluth Fair Housing Ordinance. Reinforces the state definition for housing discrimination. According to this city ordinance, age is an additional protected class in Duluth.

Minneapolis Civil Rights Act. Enumerates human rights for all residents of the City of Minneapolis. The ordinance adds ancestry to the state definition of protected classes and also establishes mechanisms for implementing and enforcing the strict anti-discrimination provisions.[13]

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[11] HUD Fair Housing Laws and Presidential Executive Orders, http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/FHLaws
[12] https://www.revisor.mn.gov/statutes/?id=363a.09
[13] http://www.ci.minneapolis.mn.us/civil-rights/docs/Civil-Rights-Brief-History.pdf

St. Paul Human Rights Act. The City of St. Paul Code of Ordinance, Chapter 183, established in 1988, protects housing discrimination within the city. The City also added ancestry and age to its definition of unfair discriminatory practices relating to real property.[14]

FAIR HOUSING STUDIES

NATIONAL FAIR HOUSING STUDIES

In 2000, HUD released a publication entitled "Discrimination in Metropolitan Housing Markets," which measured the prevalence of housing discrimination based on race or color in the U.S. Known as the Housing Discrimination Study 2000 (HDS 2000), it was the third nationwide effort to measure discrimination against minority home seekers since 1977, conducted in three phases:

Discrimination in Metropolitan Housing Markets:

1. *Phase 1 – Black and Hispanic Applicants*
   This study was based on 4,600 paired tests in 23 metropolitan areas nationwide, and results showed that, between 1989 and 2000, there was a large decrease in the level of discrimination experienced by black and Hispanic renters who sought to buy a home, while a modest decrease in discrimination was found toward black applicants who sought to rent a unit. However, this downward trend was not seen for Hispanic renters, who were more likely to experience discrimination during their housing search. Furthermore, while a decrease was seen regarding that level of discrimination since 1989, Hispanic and black home seekers still faced discrimination in their efforts to procure housing. For instance, many were told that units were unavailable while these same units were still available to white applicants. Black and Hispanic applicants were also shown and told about fewer units. In addition, Hispanic applicants were more likely in 2000 than in 1989 to be quoted a higher rent than their white counterpart for the same unit.

2. *Phase 2 - Asian and Pacific Islander Applicants*
   This study was conducted in 2000 and 2001, and its results were based on 889 paired tests conducted in 11 metropolitan areas nationwide. The key findings showed that Asian and Pacific Islander prospective renters experienced adverse treatment compared to white renters in 21.5 percent of tests. This rate was similar to Hispanic and black renters. The findings also showed that Asian and Pacific Islander prospective homebuyers experienced adverse treatment compared to white homebuyers 20.4 percent of the time, with discrimination occurring in housing availability, inspections, financing assistance, and agent encouragement.

[14] http://www.stpaul.gov/index.aspx?NID=2403

3. *Phase 3 – American Indian Applicants*
   The third and final phase estimated the level of housing discrimination experienced by American Indian applicants during their search for housing in the metropolitan areas of Minnesota, Montana, and New Mexico. Across all three areas, American Indian applicants received adverse treatment relative to white applicants in 28.5 percent of rental tests. For instance, white renters were told advertised units were available and were informed about similar and more units than similarly qualified American Indian testers. The level of unfavorable treatment and discrimination experienced by American Indian applicants in the metropolitan rental markets of the three areas listed was greater than the national levels shown for other racial minority populations.[15]

In April 2002, HUD released a national study that assessed public awareness of and support for fair housing law titled "How Much Do We Know?" The study found that only 50 percent of the population was able to identify most scenarios describing illegal conduct. In addition, 14 percent of the nationwide survey's adult participants believed that they had experienced some form of housing discrimination in their lifetime. However, only 17 percent of those who had experienced housing discrimination had taken action to resolve the issue such as filing a fair housing complaint. Finally, two-thirds of all respondents said that they would vote for a fair housing law.[16]

As a follow-up, HUD later released a study in February 2006 called "Do We Know More Now? Trends in Public Knowledge, Support and Use of Fair Housing Law." One aim of the study was to determine whether a nationwide media campaign had proven effective in increasing the public's awareness of housing discrimination, and another goal was to determine the public's desire to report such discrimination. Unfortunately, the study found that, overall, public knowledge of fair housing laws did not improve between 2000 and 2005. As before, just half of the public knew the law regarding six or more illegal housing activities. In the 2006 report, 17 percent of the study's adult participants experienced discrimination when seeking housing; however, after reviewing descriptions of the perceived discrimination, it was determined that only about 8 percent of the situations might be covered by the Fair Housing Act. Four out of five individuals who felt they had been discriminated against did not file a fair housing complaint, indicating that they felt it "wasn't worth it" or that it "wouldn't have helped." Others did not know where to complain, assumed it would cost too much, were too busy, or feared retaliation. One positive finding

[15] http://www.huduser.org/portal/publications/

[16] *How Much Do We Know?* United States Department of Housing and Urban Development, Office of Policy Development and Research, 2002. Document available at http://www.huduser.org/Publications

of the survey was that public support for fair housing laws increased from 66 percent in 2000 to 73 percent in 2005.[17]

In 2004, the U.S. General Accounting Office's (GAO) released a report titled "Fair Housing: Opportunities to Improve HUD's Oversight and Management of the Enforcement Process." The GAO report found that, between 1996 and 2003, the median number of days required to complete fair housing complaint investigations was 259 for HUD's Fair Housing and Equal Opportunity (FHEO) offices and 195 for Fair Housing Assistance Program (FHAP) agencies. The report did find a higher percentage of investigations completed within the 100-day mandate. The GAO report also identified the following trends between 1996 and 2003:

- The number of fair housing complaints filed each year steadily increased since 1998. An increasing proportion of grievances alleged discrimination based on disability, and a declining proportion alleged discrimination based on race, although race was still the most cited basis of housing discrimination;
- FHAP agencies conducted more fair housing investigations than FHEO agencies over the eight-year period. The total number of investigations completed each year increased slightly after declining in 1997 and 1998; and
- Over this time period, an increasing percentage of investigations closed without finding reasonable cause to believe discrimination occurred. However, a declining percentage of investigations was resolved by the parties themselves or with help from FHEO or FHAP agencies.[18]

In 2006, the University of Southern California and Oregon State University collaborated to study rental discrimination and race. The universities responded to 1,115 advertisements regarding apartment vacancies in Los Angeles County and signed the bottom of each email with Tyrell Jackson, a traditionally black name, Patrick McDougall, a traditionally white name or Said Al-Rahman, a traditionally Arab name. Analysis indicated that black individuals were four times more likely to be discouraged from viewing an apartment than white individuals, and Arab individuals were three times more likely to be discouraged from viewing an apartment than white individuals. The analysis also noted that black applicants were more likely to receive negative responses such as the apartment was no longer available for market rate or above market rate apartments. For example, only an email signed Tyrell Jackson received a reply that reiterated the apartment cost to ensure the apartment was within the applicant's price range. The study also analyzed the responses from private property owners versus corporate property owners but found no statistical difference in the way the two groups responded to applicants of different races.[19]

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[17] *Do We Know More Now?* United States Department of Housing and Urban Development, Office of Policy Development and Research, 2006. Document available at http://www.huduser.org/Publications.

[18] "Fair Housing: Opportunities to Improve HUD's Oversight and Management of the Enforcement Process," United States General Accounting Office, Report to Congressional Requesters, April 2004.

[19] Rental Discrimination and Ethnicity in Names", Adrian G. Carpusor, William E Loges, Journal of Applied Science, 2006

Released by the Poverty & Race Research Action Council in January 2008, "Residential Segregation and Housing Discrimination in the United States" asserts that many current governmental efforts to further fair housing actually result in furthering unfair housing practices across the U.S. This article suggests that fair housing efforts can cause residential segregation. For example, if the majority of public housing residents are non-white and most public housing accommodations are grouped in the same census tracts, residential segregation is resultant. Similarly, many Section 8 voucher holders are racial or ethnic minorities, and most housing that accepts Section 8 vouchers is grouped in selected areas, which again results in residential segregation. The report offers recommendations to curb such residential segregation, including dispersing public housing developments throughout cities and communities and providing greater incentives for landlords with several properties to accept the coupons.[20]

Published in 2009 by the National Fair Housing Alliance, "For Rent: No Kids!: How Internet Housing Advertisements Perpetuate Discrimination" presented research on the prevalence of discriminatory housing advertisements on popular websites such as Craigslist. According to the article, while newspapers are prohibited from publishing discriminatory housing advertisements, no such law exists for websites like Craigslist, as they are considered interactive internet providers rather than publishers of content. As such, they are not held to the same legal standards as newspapers. While individual landlords who post discriminatory advertisements may be held responsible, there are no such standards for companies like Craigslist that post the advertisements that are discriminatory. Other publishers of content such as newspapers are required to scan the advertisements they accept for publishing for content that could be seen as discriminatory. This may include phrases like "no children" or "Christian only," which violate provisions of the Fair Housing Act because families with children and religious individuals are federally protected groups.[21]

In May 2010, the National Fair Housing Alliance published a fair housing trends report, "A Step in the Right Direction," which indicated that recent years have demonstrated forward movement in furthering fair housing. The report began with a commendation of HUD's federal enforcement of fair housing laws and noted the agency's willingness to challenge local jurisdictions that failed to affirmatively further fair housing. In response to the recent foreclosure crisis, many credit institutions have implemented tactics to reduce risk, but this report suggests that policies that tighten credit markets, such as requiring larger cash reserves, higher down payments, and better credit scores, may disproportionally affect lending options for communities of color and women. "A Step in the Right Direction" concludes with examples of ways in which the fair housing situation could be further improved, including addressing discriminatory internet advertisements and adding gender identity, sexual orientation, and source of income as federally protected classes.[22]

[20] http://www.prrac.org/pdf/FinalCERDHousingDiscriminationReport.pdf
[21] http://www.nationalfairhousing.org/LinkClick.aspx?fileticket=zgbukJP2rMM%3D&tabid=2510&mid=8347
[22] http://www.nationalfairhousing.org/Portals/33/Fair%20Housing%20Trends%20Report%202010.pdf

LOCAL FAIR HOUSING STUDIES

While the HDS 2000 offered an abundance of national fair housing data conclusions, as described previously, it also provided in-depth assessments of housing discrimination for a number of U.S. cities. Minneapolis was selected for a study examining the rates of housing discrimination against Asian home seekers. Through paired testing, it was determined that Asian populations in Minneapolis experienced more discrimination in their efforts to obtain housing compared to white home seekers. This was the first time that the HDS 2000 tested for Asian racial disparities specifically, so results from previous studies were not comparable. However, data on the rate of housing discrimination against the Asian population in Minneapolis can be compared to data from other cities that were tested the same year. For example, this comparison revealed that the Asian population in Minneapolis experienced a higher rate of discrimination in housing matters than the Asian population in Los Angeles.[23]

In 2004, HousingLink was commissioned by the Fair Housing Implementation Council (FHIC) and its then fiscal agent, Minnesota Housing, to conduct a study of tenant screening practices in the Minneapolis-St. Paul area. The purpose of this study was to provide a better understanding of the practices of local tenant screening companies, to identify the impact of screening practices on tenants, and to make recommendations on how to ensure that tenant screening reports were as fair and accurate as possible. Under the current application process, the prospective tenant pays for the tenant screening report but is kept at a distance from the information. This process, whereby the applicant is "the last to know," represents one of the more disconcerting aspects of tenant screening services identified in this study. If the information is not favorable, the prospective tenant will be able to obtain a copy of the report only after receiving an adverse action letter, by which time it is likely too late to get the unit he or she applied for. Even then, the applicant must go through a process to request access to the information that he or she paid for through the application fee. The second issue, identified through a review of literature and demonstrated in this study, is that the increasingly popular use of tenant screening reports has resulted in a new class of persons who are unable to access rental housing because of past credit problems, evictions, poor rental histories, or criminal backgrounds. While tenant screening agencies are not responsible for this issue, it is a serious problem that must be addressed by those working with tenants, particularly those in need of affordable housing. The study offers recommendations to help facilitate equal housing opportunities.[24]

In 2005 HousingLink published its Accessibility Report based on its Accessible Housing Marketing Initiative research, which FHIC selected it to perform. This research initiative was created to analyze how often households with accessibility needs were able to find

[23] http://www.huduser.org/publications/pdf/phase2_final.pdf
[24] http://www.housinglink.org/Files/Tenant_Screening.pdf

accessible housing units in the Minneapolis-St. Paul area. Data came from HousingLink's system and measured persons who sought out accessible housing between August 2004 and April 2005. The study found that the rate of these households that were able to secure accessible housing was a barrier to fair housing opportunity. [25]

HousingLink and Legal Aid, funded by FHIC, created an educational presentation about fair housing, which is available on the HousingLink website.[26] HousingLink is also planning to record a short video about fair housing that will be targeted to property owners and landlords, also to be available online. The Agency also publishes annual foreclosure reports evaluating the distribution of foreclosures across the state.

In the article "Group Alleges Discriminatory Housing Practices," personal experiences with racial discrimination in the Minneapolis-St. Paul area in 2006 were highlighted, specifically the high number of Hispanic families that spoke out against unfair housing practices they encountered during their search for housing. According to the article, many Hispanic applicants faced traditional forms of housing discrimination, such as racial steering and higher lending rates, and less common discrimination practices, including access to English-only written materials without translation and promises of reputable home inspections that were never performed. One man noted that he worked with a real estate agent whom he thought was trustworthy only to find out that the house, which he eventually bought, was a "flipped" house that should have been condemned. Ultimately, the man's house was foreclosed upon, and he and his family became homeless. The article reports that many discriminatory housing practices are very profitable to housing companies, which offers a reason for their popularity despite the existence of numerous fair housing laws.[27]

"Racial Disparities in Manufactured Home Parks: Latinos' Experience in Minnesota," released in April 2007 by the All Parks Alliance for Change, a Minnesota organization of manufactured home park residents, suggested that Latino residents of mobile home parks in Minnesota faced greater levels of discrimination than non-Latino residents. Case studies of disparities between primarily white- and Latino-populated mobile home parks in cities throughout Minnesota, such as Bloomington, were examined to determine if discrimination occurred. The report suggested that Hispanic residents of mobile home parks experienced discrimination in the conditions, park maintenance, and rental terms offered by park managers and that local governments were more likely to spare a predominantly white mobile home park from being torn down for construction compared to a park primarily inhabited by Latino residents. In Minnesota, mobile home parks tend to be a popular housing option for persons living on a low- or very-low-income. Of the 180,000 residents of mobile homes in the state, more than 80 percent of residents had low or very low incomes.[28]

[25] http://housinglink.org/Files/Accessibility.pdf
[26] http://www.housinglink.org/Files/HousingLinkFairHousingSlides.pdf
[27] http://www.tcdailyplanet.net/node/608
[28] http://www.allparksallianceforchange.org/?q=reports/racialdisparities

In November 2008, HOME Line, a nonprofit tenant advocacy group, released its annual study regarding the acceptance of Section 8 housing assistance vouchers. This was the 14th study the group released regarding the Section 8 program, with research covering more than half of all rental units in Anoka, Dakota, and suburban Hennepin counties. Significant findings of the study included evidence that the Section 8 program was ineffective in the Twin Cities region, largely due to a lack of acceptance of Section 8 vouchers and increasing rental rates. The study found that only one-quarter of all rental units in the area were available for persons with Section 8 vouchers, and the number of landlords who accept Section 8 vouchers shrunk each year. Many landlords imposed minimum income requirements for tenants, which interfered with the purpose of housing assistance programs like Section 8 that exist to aid persons or families with low-income. Additionally, the report attested that the waiting lists for Section 8 assistance were too long.[29]

In "Communities in Crisis: Race and Mortgage Lending in the Twin Cities," conducted by the University of Minnesota Institute on Race and Poverty (IRP) and released in February 2009, the IRP reported that the metropolitan region of the Twin Cities experienced some of the worst racial disparities on mortgage lending in the nation. Using data from the Home Mortgage Disclosure Act (HMDA), the IRP identified trends in unfair and discriminatory housing practices in the Twin Cities region. This included a higher incidence of increased loan costs and worse lending terms for non-white individuals as well as increased loan denials and subprime lending for persons of color compared to white applicants. The study found that income levels had little effect on lending; even persons of color with moderate- to high-income levels experienced increased rates of loan denial and subprime lending. In fact, black and Hispanic borrowers in the highest income brackets were more likely to receive subprime loans than any white income-level group. Neighborhoods with the highest levels of persons of color also held the highest number of subprime lending and foreclosure rates. The IRP attributed these trends to a lack of enforcement of fair housing policies and laws. In order to rectify the situation, the IRP recommended a number of actions, including:

- Reinforcing the Community Reinvestment Act, which encourages banks to lend to low-income and non-white borrowers;
- Creating regional fair housing centers that would offer support and education for those who may otherwise experience discrimination in the home buying and renting markets; and
- Expanding HMDA data to include information on race, interest rates, and credit status from all applications, including those by mail, phone, and internet sources.[30]

[29] http://www.homelinemn.org/downloads/section8/2008Section8report.pdf
[30] http://www.irpumn.org/uls/resources/projects/IRP_mortgage_study_Feb._11th.pdf

Released in March 2009, "The Unraveling of the American Dream: Foreclosures in the Immigrant Community of Minneapolis" addressed the foreclosure crisis among immigrants in the Twin Cities region. The article notes that, between 2006 and 2009, foreclosures in the U.S. increased markedly. Minnesota was no exception to this trend, with the majority of foreclosures in the state occurring in the Minneapolis-St. Paul area. This region also has a significant number of immigrant populations, including Hispanic, Hmong, and Somali immigrants, and this study attempted to determine if immigrants were over- or under-represented in the foreclosure crisis. Results suggested that immigrants were somewhat over-represented in households that experienced foreclosure in the Twin Cities region since 2006.[31] The lending circumstances described in these two studies were confirmed in this Analysis of Impediments. HMDA data analysis, presented in Section V of this report, also demonstrated that racial and ethnic minorities carried undue risk of foreclosure due to a preponderance of high annual percentage rate loans.

Another study by the IRP, completed in July 2009, found that racial segregation is high in schools and neighborhoods in the Minneapolis-St. Paul metro area and increased significantly from 1992 to 2008. During those years, the number of non-white segregated schools increased from nine to 108. Such segregation affects access to jobs, education, housing, and economic opportunities. According to the IRP, "Integration efforts can help communities avoid the disinvestment, declining housing values and job losses often associated with economic and racial segregation." When implemented region-wide, "Revitalization of currently segregated inner city and inner suburb neighborhoods help the entire regional economy."

This study suggested that the placement of affordable housing is a critical determinant in school and neighborhood segregation, and must be examined across town and county lines. As it stands, LIHTC and Section 8-assisted units are disproportionately concentrated in low-income areas in the Minneapolis-St. Paul area, and would greatly reduce segregation if they were more evenly distributed across the region. Thus, a regional approach to housing can greatly improve the problems facing individual communities.

An additional study, "Foreclosure Risk Among Asian, African and Latino Homeowners in Minnesota: A Preliminary Analysis," presented research on the foreclosure risk of different cultural groups in the Twin Cities metro region. The study found that Asian, African, and Latino homeowners were at an increased risk of foreclosure in the region compared to other cultural groups. This heightened foreclosure risk was due to the increased use of high cost sub prime loans in financing of home purchases. Additionally, Asian, African, and Latino groups were at a greater risk of job loss, and, in turn, long-term unemployment during recessionary periods compared to other groups.[32]

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[31] http://www.hhh.umn.edu/people/rallen/pdf/unraveling_american_dream.pdf

[32] Skobba, Kim. "Foreclosure Risk Among Asian, African and Latino Homeowners in Minnesota: A Preliminary Analysis."

In 2010, the Northwest Area Foundation conducted a study that evaluated the adverse impact of foreclosures on neighborhoods and found that high foreclosure rates of both owner-occupied and renter-occupied homes often occur in areas dominated by racial minorities. The report recommends several public policies and public/private partnerships to address the problem.[33] HMDA data analysis, presented later in this report, confirm these findings and visibly show that racial and ethnic minorities were likely to experience higher rates of foreclosure across the state, due to their disproportionately high rates of high APR loans.

Also in 2010, the University of Minnesota Press published a study by Myron Orfield and Thomas F. Luce Jr. called *Region: Planning the Future of the Twin Cities*. One chapter of this book, entitled "Neighborhood and School Segregation," analyzes racial and income data from the 1980s through 2000s for the Minneapolis-St. Paul area. The chapter documents the increase in segregated schools and neighborhoods as well as the placement of government-supported low-income housing and its effect on schools and neighborhoods. Orfield and Luce found that school segregation and neighborhood segregation based on race and income act as a cycle and that they lead to a lack of opportunity for minorities, disinvestment in low-income communities, and hardship for the region as a whole.

The study also showed that segregation has increased dramatically since 1995. According to the Minnesota Department of Education, the number of elementary schools in the region with very high non-white student percentages went from 11 in 1995 to 83 in 2010, and the number of non-white students in those schools increased from 3,419 in 1995 (or 8 percent of all minority students in the region) to 31,535 in 2010 (36 percent). Assisted housing units were segregated as well; in 2007, 64 percent of all LIHTC and Section 8 units in the region were located in the region's central cities, where only a quarter of the region's population lived, near predominantly non-white schools. Only 17 percent of assisted units were in communities with predominantly white schools and neighborhoods. Orfield and Luce stated that combating the segregation of inner-city schools will address the problems of segregated low-income neighborhoods. Regarding steering and other fair housing issues, the book states, "Real estate agents and families use the socioeconomic and racial composition of schools to evaluate the desirability of surrounding neighborhoods." The study recommends a number of public policy actions to reduce segregation and its related problems and to promote fair housing choice.[34]

A 2011 report published by DHS, entitled "Evaluation of Current and Potential Housing Options for Persons with Disabilities," expanded community-based housing options into a plan to further the fair housing rights of Minnesotans with disabilities. This report found,

[33] http://www.nwaf.org/FileCabinet/DocumentCatalogFiles/Other/PolicyLink%20When%20Investors.pdf
[34] Luce and Orfield, *Region: Planning the Future of the Twin Cities*, University of Minnesota Press, 2010

among other conclusions, that more collaboration and partnerships between service agencies would increase availability of affordable and accessible housing.[35]

As the results of Phase 3 of HUD's 2000 discrimination audit show, most discrimination was found to be against American Indian testers. In Minnesota, FHIC has since conducted three similar audits of government-supported privately managed housing. As James Wilkinson of the Legal Aid Society of Minneapolis reported, "The most recent audit [of 17 properties in the metro area] showed a rate of differential treatment by race or national origin of close to 70 percent. Most of the subjects of those audits had been offered free fair housing training in 2009 and 2010 with advance warning of a series of audits." Similar audits in Minneapolis, Saint Cloud, and Dakota County, performed in the past, have shown comparable rates of discrimination.[36]

According to James Wilkinson of the Legal Aid Society of Minneapolis, that agency is pursuing research on criminal fraud cases targeted at minority homebuyers. Local law enforcement agencies across the state are investigating these cases as well. "Legal Aid has investigated fraudulent mortgage "rescue" scams and rent-to-own scams affecting hundreds of Latino and African American homeowners in these neighborhoods. A variety of other public and private efforts are underway to address the foreclosure problem."[37]

Currently in progress by Minnesota Housing, the Metropolitan Council, and many other local agencies, the Corridors of Opportunity (CoO) initiative will promote fair housing and equity through transit-oriented development planning in the Minneapolis/St. Paul area and will include protected class communities in the development of the plan. As part of the CoO, Minnesota Housing has administered three grants that will improve the capacity of HousingLink's affordable rental lists, create a comprehensive fair housing resource guide, and promote a marketing toolkit that educates about and encourages fair housing.[38] The collaboration and holistic approach of the CoO could be applied to other areas of the state as well for comprehensive community planning.

FAIR HOUSING CASES

NATIONAL FAIR HOUSING CASES

As noted in the introduction to this report, provisions to affirmatively further fair housing are long-standing components of HUD's Housing and Community Development programs. In fact, in 1970, Shannon v. HUD challenged the development of a subsidized low-income

[35] https://edocs.dhs.state.mn.us/lfserver/Public/DHS-6354-ENG
[36] December 30, 2011 letter from James Wilkinson, Legal Aid Society of Minneapolis
[37] December 30, 2011 letter from James Wilkinson, Legal Aid Society of Minneapolis
[38] http://www.metrocouncil.org/planning/COO/index.htm

housing project in an urban renewal area of Philadelphia that was racially and economically integrated. Under the Fair Housing Act, federal funding for housing must further integrated community development as part of furthering fair housing, but the plaintiffs in the Shannon case claimed that the development would create segregation and destroy the existing balance of the neighborhood. As a result of the case, HUD was required to develop a system for locating projects that would consider the racial and socio-economic impacts.[39] The specifics of the system were not decided upon by the court, but HUD was encouraged to consider the racial composition and income distribution of neighborhoods, racial effects of local regulations, and practices of local authorities.[40] The Shannon case gave entitlement jurisdictions the responsibility of considering the segregation effects of publicly funded housing projects on their communities as they affirmatively further fair housing.

Much more recently, and in a landmark fraud case, Westchester County, New York, was ordered to pay more than $50 million to resolve allegations of misusing federal funds for public housing projects and falsely claiming their certification of furthering fair housing. The lawsuit, which was filed in 2007 by an anti-discrimination center, alleged that the County failed to reduce racial segregation of public housing projects in larger cities within the county and to provide affordable housing options in its suburbs. The County had accepted more than $50 million from HUD between 2000 and 2006 with promises of addressing these problems. In a summary judgment in February 2009, a judge ruled that the County did not properly factor in race as an impediment to fair housing and that the County did not accurately represent its efforts of integration in its AI. In the settlement, Westchester County will be forced to pay more than $30 million to the federal government, with roughly $20 million eligible to return to the county to aid in public housing projects. The County must also set aside $20 million to build public housing units in suburbs and areas with mostly white populations. The ramifications of this case are expected to affect housing policies of both states and entitlement communities across the nation; activities taken to affirmatively further fair housing will likely be held to higher levels of scrutiny to ensure that federal funds are being spent to promote fair housing and affirmatively further fair housing.

In 2008, $3 billion of federal disaster aid was allotted to the Texas state government to provide relief from damage caused by hurricanes Ike and Dolly. These storms ravaged homes in coastal communities, many of which were owned by low-income families that could not afford to rebuild. However, instead of directing the federal funds to the areas most affected by the storms, the State spread funds across Texas and let local planning agencies spend at will. In reaction to this, two fair housing agencies in the state filed a complaint with HUD stating that the plan violated fair housing laws as well as federal aid requirements that specify half of the funds be directed to lower-income persons. In light of the complaint, HUD withheld $1.7 billion in CDBG funds until the case was resolved. A

[39] U.S. HUD, 39 Steps Toward Fair Housing, http://www.hud.gov/offices/fheo/39steps.pdf
[40] Orfield, Myron. Racial Integration and Community Revitalization: Applying the Fair Housing Act to the Low Income Housing Tax Credit. Vanderbilt Law Review, November 2005

settlement was reached in June 2010; the State was required to redirect 55 percent of the amount of the original funds to aid poorer families that lost their homes. The State was also asked to rebuild public housing units that were destroyed by the storms and to offer programs that aid minority and low-income residents in relocating to less storm-prone areas or areas with greater economic opportunities.

LOCAL FAIR HOUSING CASES

U.S. Department of Justice Cases

The U.S. Department of Justice (DOJ) enacts lawsuits on behalf of individuals based on referrals from HUD. Under the Fair Housing Act, the DOJ may file lawsuits in the following instances:

- Where there is reason to believe that a person or entity is engaged in what is termed a "pattern or practice" of discrimination or where a denial of rights to a group of persons raises an issue of general public importance,
- Where force or threat of force is used to deny or interfere with fair housing rights, and
- Where persons who believe that they have been victims of an illegal housing practice file a complaint with HUD or file their own lawsuit in federal or state court.[41]

The U.S. Attorney General's Office and the Minnesota Department of Human Rights settled a lawsuit in 2002 alleging that the developers of a Minnesota residential community discriminated on the basis of disability. The defendants allegedly fired the exclusive builder and refused to allow the sale of the three lots to a family that had plans to design a home for persons with disabilities. The consent decree ordered the developers to pay $250,000 to the aggrieved parties and to sell three lots in the development to facilitate the construction of a home that would be accessible to persons with disabilities. The settlement also called for federal monitoring for three years to ensure compliance with all federal and state anti-discrimination laws.[42]

A judgment of nearly $1.1 million in a race discrimination case was awarded in 2004.[43] This is believed to be the largest judgment ever secured by a Minnesota family in any fair housing case. The defendant sought to evict black tenants and required them to permanently vacate their apartments due to renovations, failed to provide them necessary and requested maintenance, and denied that apartments were available to rent when, in fact, they were available. In addition, the defendant was ordered to hire an independent management company to operate the rental properties, post and publish non-

[41] http://www.justice.gov/crt/about/hce/housing_coverage.php
[42] http://www.justice.gov/crt/about/hce/documents/gustafsonpress.php
[43] http://www.prrac.org/projects/fair_housing_commission/chicago/chicago_briefing.pdf

discriminatory policy, and take steps to clear up the records of several persons who were allegedly evicted for discriminatory reasons.[44]

In 2004, a Minnesota landlord agreed to pay $425,000 to settle allegations that he subjected female tenants to severe, pervasive, and unwelcome sexual harassment. Specifically, the landlord subjected female tenants to unwanted sexual touching and advances, conditioned the terms of women's tenancy on the granting of sexual favors, and entered their homes without permission or notice.[45]

In August 2006, an agreement was reached that resolved a case of systemic racial discrimination in Minneapolis. According to the settlement, owners and managers of two housing complexes were accused of housing discrimination practices against black tenants, including denying the availability of housing units, evicting tenants, and refusing to perform requested maintenance. The property owners and managers were required to adopt stricter fair housing policies, hire additional staff to manage their properties, and pay a total of $575,000 in personal and civil penalties.[46]

In September 2006, owners and managers of several rental properties in Minnesota settled the DOJ's allegations of systemic discrimination against female tenants. The complaint alleged that the property managers engaged in unwelcome sexual touching of female tenants, made unwelcome sexual advances, conditioned the terms of women's tenancy on the granting of sexual favors, and took adverse actions against female tenants who refused or objected to sexual advances. The defendants had to pay $352,000 to affected households, pay a civil penalty of $35,000, and hire an independent management company to operate the current and any future acquired properties.[47]

A Minnesota landlord agreed to pay $400,000 to settle a DOJ sexual harassment lawsuit in August 2007. The landlord allegedly subjected female tenants to severe and unwelcome sexual harassment. This included unwanted sexual advances and contact, conditioning the terms of women's tenancy on the granting of sexual favors, and entering the apartments of female tenants without permission or notice. As part of the settlement agreement, the landlord was ordered to hire an independent management company to manage his rental properties.[48]

Also in August 2007, the DOJ ruled on a disability discrimination case against a Chicago-based provider of retirement housing across the nation, including two facilities in Minnesota. According to the case, the housing facilities included extra requirements for tenants who

[44] http://www.justice.gov/opa/pr/2006/August/06_crt_548.html
[45] http://www.justice.gov/opa/pr/2004/December/04_crt_772.htm
[46] http://www.usdoj.gov/crt/housing/documents/kreisler_pr.pdf
[47] http://www.justice.gov/opa/pr/2006/September/06_crt_585.html
[48] http://www.justice.gov/opa/pr/2007/August/07_crt_606.html

required mobility devices such as wheelchairs, walkers, canes, and scooters. These requirements included a demonstration of competent operation, additional insurance coverage, and a note from a physician proving need. Additionally, persons using mobility devices were not allowed to enter certain areas of facilities. In light of the ruling, the company was required to set up a fund of more than $500,000 to aid those who have suffered and to pay $250 to each tenant who was forced to undergo competency testing of their mobility device. The company was also required to adopt new and stricter policies regarding discrimination, improve record keeping, and impose new guidelines in their employee training.[49]

A man who rented properties in Hastings and St. Paul was required to pay $400,000 to female tenants who were harassed while living in his properties. The report cites that the landlord demanded sexual favors from female tenants and threatened them with alterations to the terms of leasing agreements. He also entered apartments without permission or notice. The landlord was required to hire a manager to handle all of his properties.[50]

In October 2007, two landlords settled a sexual harassment lawsuit for $240,000 and were required to use an independent property manager. The federal government alleged that the male landlord sexually harassed female tenants living on his properties by way of verbal advances and unwanted physical touching. He was also accused of entering the tenants' homes without prior notification. The tenants stated that the male landlord instructed them not to report the landlords because their status as single mothers on public assistance would ensure that they would not be believed.[51]

On May 20, 2010, the federal court in Minneapolis approved a consent decree in a lawsuit filed alleging that the owner and management company of a 24-unit apartment building in Minnesota violated the Fair Housing Act by prohibiting service animals of certain sizes and breeds. The defendants were ordered to revise their policy to remove the size and breed limitations, attend regular fair housing training, and pay $3,000 to Fair Housing of the Dakota's.[52]

The United States filed a lawsuit against a company for violating the Fair Housing Act in June 2010. The landlords allegedly refused to rent a dwelling based on race. The prospective tenant, a black applicant, was told that the property he wished to rent was undergoing renovations. Shortly after, the unit was rented to a white female. When the prospective tenant contacted the landlord again, the landlord purportedly informed him he could not rent an apartment because of his criminal background. However, a white man

[49] http://www.usdoj.gov/opa/pr/2007/August/07_crt_651.html
[50] http://www.usdoj.gov/opa/pr/2007/August/07_crt_606.html
[51] http://www.associatedcontent.com/article/420185/yet_another_minnesota_landlord_settles.html?cat=17
[52] http://www.justice.gov/crt/about/hce/documents/vanradensettle.pdf

who was convicted of more felonies was leased an apartment because "everybody needs a second chance."[53]

In February 2011, two landlords with properties in Detroit Lakes settled on allegations that they refused to rent a dwelling based on race. The complaint was filed after a prospective tenant was told that a property was available over the phone but informed that it was not available to rent after she saw the unit in person. The complainant also reported that the next-door neighbors informed her that they would move out if the landlords rented to a black person. After the defendants were notified that it is illegal to refuse to rent based on race, they claimed to have refused to rent because the unit was too small for the prospective tenant, due to the fact that she had dogs, and also that one of the landlords had plans to move into the unit. One month later, the property was rented to a white male. The defendants were ordered to pay $25,500 to the complainant.[54]

Other Local Fair Housing Cases

In a regional fair housing race discrimination case in 2002, a family was awarded the largest fair housing settlement in Minnesota state history after their landlord tried to evict them on the basis of race. The suit was filed against Robert Kreisler, a businessman and owner of several rental properties and apartment buildings in the state. It was alleged that Kreisler had a policy against renting to black persons and that, when he bought the property a black family was residing in, he tried to force them out despite the fact that they had been living there for years. In addition to the financial stipulations, Kreisler was also ordered to follow a consent decree, with effects for five years, forcing him to adopt fair housing policies in the future and subjecting him to periodic undercover testing.[55]

In January 2008, after violating federally-mandated lead-level disclosure laws, nine property owners and one property management company in the St. Paul-Minneapolis area reached a settlement in a case prompted by HUD, the EPA, and the U.S. Attorney's Office for the State of Minnesota. The three government agencies alleged that the property managers and owners were aware of potentially harmful levels of lead in the housing they offered but did not make these hazards known. Withholding lead-level information is illegal under the Lead Disclosure Rule, which requires sellers and landlords of housing built before 1978 to disclose lead-based paint hazards to tenants in writing. As a result of the settlement, the property owners and managers were ordered to pay to improve the lead-level conditions of their properties, forfeit a $7,500 fine, and also contribute $50,000 to the Child Health Improvement Project, which aids projects that benefit children in low-income areas. The

[53] www.usdoj.gov/usao/mn
[54] http://www.justice.gov/usao/mn/press/feb015.pdf
[55] http://www.fairhousing.com/index.cfm?method=page.display&pageID=3619

settlement resulted in the elimination of all lead-based paint risks in nearly 200 apartments in the area and is the seventh lead-level case in Minnesota in recent history.[56]

A settlement was reached in December 2008 resolving allegations of discrimination against the Minneapolis Public Housing Authority (MPHA). According to court documents, the MPHA was accused of inquiring about the disability status of potential public housing tenants, which violated fair housing laws regarding discrimination. The agency also allegedly violated fair housing laws by restricting public housing access of disabled persons to those aged 50 or older. As part of the settlement, the MPHA was required to pay damages to the plaintiffs in the case as well as court fees.[57]

Also in December 2008, three lawsuits against the City of St. Paul that claimed the City was discriminatory in enforcing housing codes and unfairly targeting some landlords who rented to low-income and minority tenants were dismissed. City officials allegedly exaggerated and lied about housing code violations at their properties, encouraged tenants to file false court claims against them, and used police to intimidate them and their tenants.[58]

SUMMARY

A review of laws, studies, cases, and related materials relevant to fair housing in the State of Minnesota demonstrated the complexity of the fair housing landscape. It was determined that state law and several local ordinances offer protections beyond the scope of the federal Fair Housing Act. Examination of these conditions revealed issues of discrimination in the rental markets, including refusal to rent and harassment, potentially unfair lending practices in the home purchase markets, resistance to development of group housing, and unbalanced enforcement of housing codes.

[56] http://www.realtown.com/articles/view/hud-scores-legal-settlement-with-minneapolis-st-paul-landlords
[57] From Stipulation for Dismissal and Order, Civil Action No. 08 CV 2754, December 2008.
[58] http://www.startribune.com/local/stpaul/36480724.html?page=1&c=y

SECTION IV. REVIEW OF THE EXISTING FAIR HOUSING STRUCTURE

The purpose of this section is to provide a profile of fair housing in the State of Minnesota based on a number of factors, including an enumeration of key agencies and organizations that contribute to affirmatively furthering fair housing in the State of Minnesota, evaluation of the presence and scope of services of existing fair housing organizations, and a review of the complaint process.

FAIR HOUSING AGENCIES

FEDERAL AGENCIES

U.S. Department of Housing and Urban Development

The United States Department of Housing and Urban Development (HUD) oversees, administers, and enforces the federal Fair Housing Act. HUD's regional office in Chicago, Illinois, oversees housing, community development, and fair housing enforcement in Minnesota as well as Illinois, Indiana, Michigan, Ohio, and Wisconsin.[59] The Office of Fair Housing and Equal Opportunity (FHEO), within HUD's Chicago office, enforces the Fair Housing Act and other civil rights laws that prohibit discrimination in housing, mortgage lending, and other related transactions in Minnesota.

HUD also provides education and outreach and monitors agencies that receive HUD funding for compliance with civil rights laws. In Minnesota, in September 2011, HUD's Assistant Secretary for Fair Housing held a day-long event on discrimination based on national origin, bringing in a housing industry audience from across the state. HUD also works with state and local agencies under the Fair Housing Assistance Program (FHAP) and Fair Housing Initiative Program (FHIP), as described below.

Fair Housing Assistance Program

In the U.S., many agencies receive funding directly from HUD as Fair Housing Assistance Program (FHAP) recipients, which require an ordinance or law that empowers a state or local governmental agency to enforce the state or local fair housing laws. If HUD determines that the local entity can operate on a "substantially equivalent" level to federal agency enforcement activities, HUD contracts with that agency to process fair housing complaints

[59] http://www.hud.gov/offices/fheo/aboutfheo/fhhubs.cfm#hdcent

and reimburses the jurisdiction on a per case basis.[60] FHAP grants are given to public, not private, entities and are awarded on a noncompetitive, annual basis to substantially equivalent state and local fair housing enforcement agencies.

To create a substantially equivalent agency, a state or local jurisdiction must first enact a fair housing law that is substantially equivalent to federal laws. In addition, the local jurisdiction must have both the administrative capacity and fiscal ability to carry out the law. With these elements in place, the jurisdiction may apply to HUD in Washington, D.C., for substantially equivalent status. The jurisdiction's law would then be examined, and the federal government would make a determination as to whether it is substantially equivalent to federal fair housing law.

When substantially equivalent status has been granted, complaints of housing discrimination are dually filed with the state or local agency and HUD. The state or local agency investigates most complaints. However, when federally subsidized housing is involved, HUD will typically investigate the complaint. Still, the state or local agencies are reimbursed for complaint intake and investigation and are awarded funds for fair housing training and education.

In the State of Minnesota, the City of Duluth Human Rights Office exists as a substantially equivalent FHAP agency. A summary of this agency and its services is presented later in this section.

Fair Housing Initiative Program

A FHIP participant may be a government agency, a private nonprofit, or a for-profit organization. FHIPs are funded through a competitive grant program that provides funds to organizations to carry out projects and activities designed to enforce and enhance compliance with fair housing laws. Eligible activities include education and outreach to the public and the housing industry on fair housing rights and responsibilities as well as enforcement activities in response to fair housing complaints, including testing and litigation.[61] The following FHIP initiatives provide funds and competitive grants to eligible organizations:

> "*The Fair Housing Organizations Initiative (FHOI)* provides funding that builds the capacity and effectiveness of non-profit fair housing organizations by providing funds to handle fair housing enforcement and education initiatives more effectively. FHOI also strengthens the fair housing movement nationally by encouraging the

[60] http://www.hud.gov/offices/fheo/progdesc/title8.cfm
[61] http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/partners/FHIP

creation and growth of organizations that focus on the rights and needs of underserved groups, particularly persons with disabilities …

> "[**Eligible Grantees:**] Applicants must be qualified fair housing enforcement organizations with at least two years of experience in complaint intake, complaint investigation, testing for fair housing violations, and meritorious claims in the three years prior to the filing of their application …
>
> "[**Eligible Activities:**] Grants may be used flexibly to support the basic operation and activities of new and existing non-profit fair housing organizations." [62]

"*The Private Enforcement Initiative (PEI)* offers a range of assistance to the nationwide network of fair housing groups. This initiative funds non-profit fair housing organizations to carry out testing and enforcement activities to prevent or eliminate discriminatory housing practices …

> "[**Eligible Grantees:**] Fair housing enforcement organizations that meet certain requirements related to the length and quality of previous fair housing enforcement experience may apply for FHIP-PEI funding …
>
> "[**Eligible Activities:**] Funds such activities as conducting complaint-based and targeted testing and other investigations of housing discrimination, linking fair-housing organizations in regional enforcement activities, and establishing effective means of meeting legal expenses in support of fair housing litigation."[63]

"*The Education and Outreach Initiative (EOI)* offers a comprehensive range of support for fair housing activities, providing funding to State and local government agencies and non-profit organizations for initiatives that explain to the general public and housing providers what equal opportunity in housing means and what housing providers need to do to comply with the Fair Housing Act …

> "[**Eligible Grantees:**] State or local governments, qualified fair housing enforcement organizations (those with at least 2 years of experience), other fair housing organizations, and other public or private nonprofit organizations representing groups of persons protected by the Fair Housing Act may apply for FHIP-EOI funding …

[62] http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/partners/FHIP/fhip
[63] http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/partners/FHIP/fhip

"[**Eligible Activities:**] Funds a broad range of educational activities that can be national, regional, local, or community-based in scope. Activities may include developing education materials, analyzing local impediments to housing choice, providing housing counseling and classes, convening meetings that bring together the housing industry with fair housing groups, developing technical materials on accessibility, and mounting public information campaigns. National projects that demonstrate cooperation with the real estate industry or focus on resolving the community tensions that arise as people expand their housing choices may be eligible to receive preference points." [64]

"*The Administrative Enforcement Initiative (AEI)* helps State and local governments who administer laws that include rights and remedies similar to those in the Fair Housing Act implement specialized projects that broaden an agency's range of enforcement and compliance activities. No funds are available currently for this program." [65]

There were three primary HUD FHIP grant recipients in the State of Minnesota from 2007 through 2010. The Legal Aid Society of Minneapolis (LASM), the ACORN Housing Corporation Education and Outreach Initiative, and the Minneapolis Urban League were awarded FHIP grants during this period.

In 2007, LASM received $275,000 for fair housing enforcement activities through a partnership with Southern Minnesota Regional Legal Services (SMRLS). These enforcement activities included providing fair housing referral and technical assistance to southern Minnesota clients, working to increase housing opportunities in the area, encouraging accessible design, and helping end chronic homelessness.

Also in 2007, a $100,000 grant went to ACORN Housing Corporation Education and Outreach Initiative in an effort to increase minority homeownership and familiarize home seekers with their housing rights. This project included creating and distributing educational materials about predatory lending in Spanish, Hmong, and Somali, the three most widely spoken languages in immigrant communities in the Minneapolis-St. Paul area.[66]

LASM received another $275,000 in 2008, which helped expand its enforcement program activities with SMRLS. The two agencies used the funds to enforce fair housing laws for low-income and disabled protected class members in the 53 Southern and Central Minnesota

[64] http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/partners/FHIP/fhip
[65] http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/partners/FHIP/fhip
[66] http://archives.hud.gov/news/2007/pr07-148.pdf

counties, including the metro area. They also provided referral and technical assistance statewide to clients, advocates, agencies, and lawyers.[67]

In 2009, the LASM used its grant for the same program goals, in partnership with SMRLS, to enforce fair housing laws for low-income and disabled persons. Statewide, funds were again used to assist clients, advocates, agencies, and lawyers with projects to assert fair housing rights.[68]

In 2010, LASM received $356,365 for activities to address mortgage abuse and scams in Southern Minnesota. The agency provided assistance and counseling for loan modifications, foreclosure, and unlawful mortgage lending practice. It also trained attorneys, community organizers, foreclosure counselors, and government officials on lending discrimination and mortgage rescue scams.

LASM received an additional $325,000 in 2010 for fair housing enforcement activities in Minnesota. It again partnered with SMRLS with the same enforcement goals it had in 2007, 2008, and 2009. The funds were meant to address 1,200 housing discrimination complaints, providing solutions for 400 victims. The funds were also used for technical assistance to public and private partners for accessibility compliance with the Fair Housing Act.

In the same year, the Minneapolis Urban League was awarded $124,447 for lending education and outreach activities in the Empowerment Zone of the metro area. The League worked with Financial Rehabilitation, Inc., and Northside Community Reinvestment Coalition to hold community forums, do grassroots outreach, provide housing counseling, and process housing discrimination complaint referrals.[69]

[67] http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/partners/FHIP/FY2008FHIP
[68] http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/partners/FHIP/FY2009FHIP
[69] http://portal.hud.gov/hudportal/documents/huddoc?id=fy2010fhipgrants.pdf

STATE AGENCIES

The Minnesota Department of Human Rights

The Fair Housing division of the Minnesota Department of Human Rights (DHR) enforces the Minnesota Human Rights Act, which offers the protections of the federal Fair Housing Act, including race, sex, religion, familial status, disability, national origin, and color, as well as creed, sexual or affectional orientation, marital status, and receipt of public assistance.[70] These protections apply to situations regarding selling or leasing property, advertising property, negotiating housing contracts, appraising property, showing available housing, and listing available housing. As with other states, there are exceptions to fair housing policies in specific cases. For example, a person who rents a room in his or her own home may choose a tenant based on gender, and a person who owns an apartment building with two units or fewer may elect to rent to persons of a specific sexual orientation. Exemptions also include persons who sell their home without the aid of a broker and organizations that provide housing to a limited membership.[71] The goal of the Minnesota DHR is to "make Minnesota discrimination free" through enforcement, advocacy, and education.[72] While the DHR could, theoretically, be granted substantially equivalent status as a FHAP, this process has not been attempted by the agency. Thus, the DHR is not considered a substantially equivalent agency at this time.

Freeman Building
625 Robert Street North
St. Paul, Minnesota 55155
Telephone: (651) 539-1100
TTY: (651) 296-1283
Toll Free: (800) 657-3704
Fax: (651) 296-9042
http://www.humanrights.state.mn.us

The Minnesota DHR's annual conference, though cancelled in 2011 due to funding constraints, provides professional education on human rights and typically addresses fair housing issues in its presentations.

LOCAL AGENCIES

Duluth Department of Human Rights

[70] http://www.humanrights.state.mn.us/rights_housing.html
[71] http://www.cashenn.org/media/Revised_hsgbroch.pdf
[72] http://www.humanrights.state.mn.us/index.html

The Duluth Office of Human Rights, which exists as a FHAP agency, was established by an ordinance to enforce city and state human rights laws and to make sure city services are accessible to all persons without discrimination. The Human Rights Office began operation in 2002 with the hiring of a Human Rights Officer. The Human Rights Officer and staff serve as the Equal Opportunity Representative for the City of Duluth, responsible for enforcement of policies against discrimination and harassment and promoting an accessible and diverse work force within the city. The Human Rights Office also serves as Duluth's ADA Coordinator, which works to increase full accessibility to all city services and programs.

City of Duluth
Human Rights Office
Room 410, 411 West First Street
Duluth, Minnesota 55802
Telephone: 218-730-5630
http://www.duluthmn.gov/human_rights/

Fair Housing Implementation Council

The Fair Housing Implementation Council (FHIC) is the lead agency representing the cities of Bloomington, Eden Prairie, Minneapolis, Minnetonka, Plymouth, St. Paul, and Woodbury and the counties of Anoka, Carver, Dakota, Hennepin, Ramsey, and Washington. FHIC provides fair housing outreach and education for renters, apartment managers, and social service providers in the area, such as a training it held in 2011 for real estate brokers on avoiding discrimination problems.

c/o Mark Hendrickson, Chair
Hennepin County Housing, Community Works & Transit
417 North Fifth Street, Suite 320
Minneapolis, Minnesota 55401-1362
Telephone: 612-348-2920

HOME Line

HOME Line is a nonprofit, statewide tenant advocacy organization. Its services include legal, education, and advocacy services for renters, apartment managers, and social service providers in Minnesota. HOME Line is located in Minneapolis and primarily provides services in the metro area and southeastern Minnesota.[73]

3455 Bloomington Avenue
Minneapolis, Minnesota 55407

[73] http://www.homelinemn.org/

Metro Area Telephone: 612-728-5767
Greater Minnesota Telephone: 1-866-866-3546
http://www.homelinemn.org/

HousingLink

HousingLink provides an online affordable housing vacancy listing service that helps connect landlords and tenants with affordable housing opportunities. Located in Minneapolis, HousingLink offers listings across the state. The agency researches housing issues in Minnesota and provides information regarding fair housing on its website. HousingLink also partners with other local agencies and housing authorities to collaborate on research and educational projects to further fair housing. It provides publications, handbooks, and presentations to property owners and managers and social service agencies in the Minneapolis/St. Paul area.

International Market Square, Suite 509
275 Market Street
Minneapolis, Minnesota 55405
Telephone: 612-522-2500
http://housinglink.org

Legal Aid Society of Minneapolis

LASM, a FHIP recipient, assists low-income persons, seniors, and persons with mental or physical disabilities with their legal needs within Hennepin County, including fair housing situations.[74] The society is comprised of attorneys, paralegals, and support staff who assist clients with legal issues relating to their homes, incomes, families, and health by providing a full range of legal services, from individual counseling and administrative advocacy to representation in litigation. LASM units include Basic Needs Law, the Senior Law Project, the Housing Discrimination Law Project, the Youth Law Project, the Immigration Law Project, the Tax Law Project, Community Legal Education, and the Fund for the Legal Aid Society. The contact information for the office is presented below.

430 First Avenue North, Suite 300
Minneapolis, Minnesota 55401-1780
Intake Number for New Clients: 612-334-5970
Telephone: 612-332-1441
TDD: 612-332-4668
http://www.mylegalaid.org/

[74] http://www.mylegalaid.org/

A recent fair housing activity of the LASM was a partnership with HUD and the Minnesota DHR, which resulted in an educational brochure regarding accessibility design standards and resources that was mailed to developers of multifamily housing in the metro area.

Legal Aid Services of Northeastern Minnesota

The Legal Aid Services of Northeastern Minnesota (LASNEM) has offices in Grand Rapids, Duluth, and Virginia. LASNEM provides free legal advice and representation to low-income persons who live in Northeastern Minnesota. At LASNEM, attorneys provide basic protection by enforcing the law when clients' rights have been violated, representing clients' interests in obtaining changes in law where its effect is unjust, and informing low-income persons of their legal rights and responsibilities.[75]

[75] http://www.lasnem.org/DNN/

302 Ordean Bldg
424 West Superior Street
Duluth, Minnesota 55802
Telephone: 218-623-8100
HandsNet ID: HN2945

Minneapolis Department of Civil Rights

The Minneapolis Department of Civil Rights (MDCR) enforces the protections guaranteed by the Minneapolis Civil Rights Act. This Act extends the national and state fair housing policies to include the protection of ancestry and specifies that the following actions are also against the policies of the city regarding fair housing: withholding information about discriminatory acts; retaliating against those who file discrimination complaints; assisting or encouraging others to perform discriminatory acts; utilizing advertising, rental applications, or other paper documents to discriminate; and obstructing the rights of others to enjoy their rights to fair housing.[76] The MDCR does not carry substantially equivalent status.

Department of Civil Rights
350 South 5th Street, Room 239
Minneapolis, Minnesota 55415
Telephone: 612-673-3012
http://www.ci.minneapolis.mn.us/civil-rights/

Minneapolis Urban League

The Minneapolis Urban League, which operates as a FHIP recipient, links African descendants and other persons of color to opportunities that result in economic success and prosperity and advocates for policies that eradicate racial disparities. The Urban League is a community-based nonprofit organization that has been in existence for a century. Each year, the League provides direct service to nearly 4,000 persons, and 20,000 seeking public advocacy. At the 100 year mark, the goals continue to include building the human and material infrastructure of the community of persons of African descent in Minnesota.

Minneapolis Urban League
2100 Plymouth Avenue North
Minneapolis, Minnesota 55411
Telephone: 612-302-3100
http://mul.org/

[76] http://www.municode.com/Resources/gateway.asp?pid=11490&sid=23

Minnesota Legal Services Coalition

The Minnesota Legal Services Coalition, made up of seven regional legal services programs, works to improve cooperation and coordination on programs that help low-income Minnesotans with a range of civil legal matters. The Coalition has a large collection of fair housing resources online, available in English, Spanish, and Somali.

Minnesota Legal Services Coalition
Midtown Commons - Suite #101B
2324 University Avenue West
St. Paul, Minnesota 55114
Telephone: 651-228-9105
http://www.LawHelpMN.org

Minnesota Multi Housing Association

The Minnesota Multi Housing Association (MHA) is a large, statewide nonprofit association of apartment management companies, developers, common interest communities, and other providers. It provides public policy leadership, educational opportunities, and communications and marketing to improve the industry. Along with Minnesota Housing and the National Association of Housing and Redevelopment Organizations, at the annual statewide Working Together Conference, the MHA sponsors fair housing training for owners and managers of rental properties.

Minnesota Multi Housing Association
1600 W 82nd Street, Suite 110
Bloomington, Minnesota 55431
Telephone: 952-854-8500
http:// http://www.mmha.com/

St. Paul Department of Human Rights and Equal Economic Opportunity Human Rights Division

The St. Paul Department of Human Rights (SPDHR) exists to enforce the St. Paul Human Rights Act, which puts forward the additional fair housing protections of ancestry and age. St. Paul's housing policies include its protections in situations of selling and leasing property, financing the purchase or repair of housing, and granting access to guests of housing occupied by tenants. There are a number of exceptions to the city's fair housing policies. For example, a person who is deemed a direct threat to the safety and well-being of other tenants can be turned away. Housing that is designated for the elderly or affected groups and housing that accommodates four families or fewer, and in which the property

owner resides are also not included under fair housing policies in St. Paul.[77] The SPDHR is not considered a substantially equivalent agency.

Human Rights
15 W. Kellogg Boulevard
CH 240
St. Paul, Minnesota 55102
Telephone: 651-266-8966
http://www.stpaul.gov/index.aspx?NID=3869

Southern Minnesota Regional Legal Services

Southern Minnesota Regional Legal Services (SMRLS) offers legal representation and information, at no cost, to low-income persons in many counties in Minnesota. Their offices are held in Albert Lea, Mankato, Rochester, and St. Paul. Fair housing cases are included in their scope of work.[78]

Southern Minnesota Regional Legal Services
Administrative Offices
1000 Alliance Bank Center
55 E 5th Street
St. Paul, Minnesota 55101

COMPLAINT PROCESS REVIEW

COMPLAINT PROCESSES FOR FAIR HOUSING AGENCIES

U.S. Department of Housing and Urban Development

According to the HUD website, any person who feels that his or her housing rights have been violated may submit a complaint to HUD via phone, mail, or the internet. A complaint can be submitted to the national HUD office at:

Office of Fair Housing and Equal Opportunity
Department of Housing and Urban Development
451 Seventh Street Southwest, Room 5204
Washington, DC 20410-2000
Telephone: 202-708-1112

[77] http://www.stpaul.gov/index.asp?nid=2409
[78] FHIC Analysis of Impediments 74 Final Report: 10/27/09

Toll Free: 800669-9777
http://www.hud.gov/offices/fheo/online-complaint.cfm

In Minnesota, the contact information for the regional HUD office in Minneapolis is:

Minneapolis Field Office
International Centre
920 Second Avenue South, Suite 1300
Minneapolis, Minnesota 55402-4012
Telephone: 612-370-3000
TTY: 612-370-3186

When a complaint is submitted, intake specialists review the information and contact the complainant in order to gather additional details and determine if the case qualifies as possible housing discrimination. Complaints that are specific to a state or locality that is part of HUD's FHAP organizations are referred to the appropriate parties, who have 30 days to address the complaint. If HUD is handling the case, the formal complaint is sent to the complainant for review and then sent to the alleged violator for review and response.

Next, the circumstances of the complaint are investigated through conducting interviews and examining relevant documents. During this time, the investigator attempts to rectify the situation through conciliation, if possible. The case is closed if conciliation of the two parties is achieved or if the investigator determines that there was no reasonable cause of discrimination. If reasonable cause is found, then either a federal judge or a HUD Administrative Law Judge hears the case and determines damages, if any.[79]

Minnesota Department of Human Rights

The Minnesota DHR accepts housing discrimination complaints from within the state. The contact information for the main office is:

Freeman Building
625 Robert Street North
St. Paul, Minnesota 55155
Telephone: 651-539-1100
TTY: 651-296-1283
Toll Free: 800-657-3704
http://www.humanrights.state.mn.us

[79] http://www.hud.gov/offices/fheo/complaint-process.cfm

The contact information for the satellite office that serves Saint Cloud and Saint Joseph areas of Minnesota is:

Minnesota Department of Human Rights-Saint Cloud
City Hall
400 2nd Street South
Saint Cloud, Minnesota 56301
Telephone: 651-539-1100
TTY: 651-296-1283
Toll Free: 800-657-3704
www.humanrights.state.mn.us/stcloud

There is a statue of limitation for filing a charge under the DHR of one year from the date of the incident. The basic steps in the department's complaint process begin with discussing the situation with the DHR intake staff or an attorney. If the complaint is covered by the Minnesota Human Rights Act and the complainant wishes to pursue allegations, the DHR intake staff or an attorney prepares the charge. A signed and notarized charge is filed and sent to the respondent, and an opportunity may be offered to mediate a resolution of the case prior to determination.

The process for investigation and determination continues with the DHR, which conducts an investigation of the charge. Next, DHR makes a determination on the charge, and the complainant has the option of appealing a No Probable Cause determination. The department has one year to make a determination. The one-year time limit can be suspended if parties are participating in alternative dispute resolution sanctioned by the commissioner.

Duluth Department of Human Rights

The Duluth Office of Human Rights is the substantially equivalent agency in Minnesota according to HUD's website. The contact information for this office is:

City of Duluth
Human Rights Office
Room 410, 411 West First Street
Duluth, Minnesota 55802
Telephone: 218-730-5630
http://www.duluthmn.gov/human_rights/

According to the Human Rights Officer, Duluth currently accepts fair housing complaints. However, the city's website does not provide information regarding the complaint process.

COMPLAINT PROCESS FOR THE MINNEAPOLIS DEPARTMENT OF CIVIL RIGHTS

The Minneapolis Department of Civil Rights accepts housing discrimination complaints from within the state. The contact information for the office is:

Department of Civil Rights
350 South 5th Street, Room 239
Minneapolis, Minnesota 55415
Telephone: 612-673-3012
http://www.ci.minneapolis.mn.us/civil-rights/

Anyone who believes he or she has been subjected to unlawful discrimination may contact the department to set up an intake appointment with the intake officer. The intake officer will discuss the alleged discriminatory act and the investigatory process with him or her. Appointments can be set up in person or by phone at 612-673-2091 or online by completing an online complaint request. Once the online request is submitted, the intake officer will contact the complainant to set up an intake appointment.

The intake officer uses information collected during the initial meeting to determine whether or not to file a charge of discrimination. Charges of discrimination must be filed within one year of the alleged discriminatory act. After the charging party reviews and signs the charge, the department sends it to the alleged discriminatory party within 10 days. The respondent must submit a written response to the department within 20 days of receiving the charge. The complainant will receive a copy of the respondent's written response and have 20 days to respond with a rebuttal statement.

COMPLAINT PROCESS FOR THE ST. PAUL HUMAN RIGHTS DIVISION

The St. Paul Human Rights Division accepts housing discrimination complaints from within the City of St. Paul. The contact information for the office is:

Human Rights
15 W. Kellogg Boulevard
CH 240
St. Paul, Minnesota 55102
Telephone: 651-266-8966
http://www.stpaul.gov/index.aspx?NID=3869

When an individual believes that he or she has been discriminated against in St. Paul, he or she may file a complaint with the office. The complainant provides information on the protected class, the harm suffered, and the area and basis of the alleged discrimination. Under the Human Rights Ordinance, the complainant cannot be retaliated against for filing a charge.

The party against whom the charge has been filed submits a position statement and response to the initial information request. In the position statement, the respondent provides his or her explanation of events and the reasons why they took place. In the response to the initial information request, the respondent provides confidential documents necessary to the investigation.

Next, the complainant responds to the respondent's position statement. The human rights investigator may then choose to interview management and other witnesses in confidence. Under the Human Rights Ordinance, a witness cannot be retaliated against for participating in an interview.

After evaluating all the facts in light of applicable law, the human rights specialist, subject to director approval, makes a recommendation as to whether there is probable cause for the discrimination that took place. If no probable cause is determined, the complainant can file an administrative appeal. This department is currently in the process of obtaining substantially equivalent status.

SUMMARY

In Minnesota, several organizations provide fair housing services, including outreach and education, complaint intake, and testing and enforcement activities for both providers and consumers of housing. These organizations include a HUD field office, the Minnesota DHR, the Duluth Human Rights Department, the Minneapolis Department of Civil Rights, and the St. Paul Human Rights Division. A number of other organizations also contribute to

affirmatively furthering fair housing through legal advocacy or other services, such as the Legal Aid Society of Minneapolis and Legal Aid Services of Northeastern Minnesota.

SECTION V. FAIR HOUSING IN THE PRIVATE SECTOR

As part of the AI process, HUD suggests that the analysis focus on possible housing discrimination issues in both the private and public housing sectors. Examination of Minnesota's public housing sector is presented in Section VI, while this section focuses on research regarding the state's private housing sector, including the mortgage lending market, the real estate market, the rental market, and other private housing industries.

LENDING ANALYSIS

HOME MORTGAGE DISCLOSURE ACT DATA

Since the 1970s, the federal government has enacted several laws aimed at promoting fair lending practices in the banking and financial services industries. A brief description of selected federal laws aimed at promoting fair lending follows:

- The 1968 *Fair Housing Act* prohibits discrimination in housing based on race, color, religion, and national origin. Later amendments added sex, familial status, and disability. Under the Fair Housing Act, it is illegal to discriminate against any of the protected classes in the following types of residential real estate transactions: making loans to buy, build, or repair a dwelling; selling, brokering, or appraising residential real estate; and selling or renting a dwelling.

- The *Equal Credit Opportunity Act* was passed in 1974 and prohibits discrimination in lending based on race, color, religion, national origin, sex, marital status, age, receipt of public assistance, and the exercise of any right under the Consumer Credit Protection Act.[80]

- The *Community Reinvestment Act* was enacted in 1977 and requires each federal financial supervisory agency to encourage financial institutions in order to help meet the credit needs of the entire community, including low- and moderate-income neighborhoods.

- Under the *Home Mortgage Disclosure Act (HMDA)*, enacted in 1975 and later amended, financial institutions are required to publicly disclose the race, sex, ethnicity, and household income of mortgage applicants by the census tract in which the loan is proposed as well as outcome of the loan application. The analysis presented herein is from the HMDA data system.

[80] *Closing the Gap: A Guide to Equal Opportunity Lending,* The Federal Reserve Bank of Boston, April 1993.

HMDA requires both depository and non-depository lenders to collect and publicly disclose information about housing-related applications and loans.[81] Both types of lending institutions must meet the following set of reporting criteria:

[81] Data are considered "raw" because they contain entry errors and incomplete loan applications. In 2004, the HMDA data made substantive changes in reporting. It modified the way it handled Hispanic data, loan interest rates, and multifamily loan applications.

1. The institution must be a bank, credit union, or savings association;
2. The total assets must exceed the coverage threshold;[82]
3. The institution must have had an office in a Metropolitan Statistical Area (MSA);
4. The institution must have originated at least one home purchase loan or refinancing of a home purchase loan secured by a first lien on a one- to four-family dwelling;
5. The institution must be federally insured or regulated; and
6. 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, additional reporting criteria are as follows:

1. The institution must be a for-profit organization;
2. 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;
3. 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 mortgages on property located in an MSA in the preceding calendar year; and
4. The institution must have assets exceeding $10 million or have originated 100 or more home purchases in the preceding calendar year.

HMDA data represent most mortgage lending activity and are thus the most comprehensive collection of information available regarding home purchase originations, home remodel loan originations, and refinancing.

As presented below in Table V.1, HMDA information was collected from the State of Minnesota from 2004 through 2009. During this time, 2,781,117 loan applications were reported by participating institutions for home purchases, home improvements, and refinancing mortgages. A total of 990,195 loan applications were specifically for home purchases.

Table V.1
Purpose of Loan by Year
State of Minnesota
HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	Total
Home Purchase	199,380	238,031	213,210	140,415	96,846	102,313	990,195
Home Improvement	39,012	40,951	40,096	35,168	24,202	16,729	196,158
Refinancing	339,366	335,345	286,232	221,138	151,865	260,818	1,594,764
Total	**577,758**	**614,327**	**539,538**	**396,721**	**272,913**	**379,860**	**2,781,117**

[82] 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.

Within this set of data, it is of prime importance to evaluate only the owner-occupied home purchase transactions. Home purchases and access to homeownership are the focus of this particular analysis because other categories typically apply to units already purchased and do not reflect the ability of an individual to choose an owner-occupied home. As seen in Table V.2, below, of the 990,195 home purchase loan application submitted during this time period, 877,836 were specifically for owner-occupied homes. The number of owner-occupied home purchase loan applications was highest in 2005, at 209,709 applications.

Table V.2
Owner Occupancy Status for Home Purchase Loan Application
State of Minnesota
HMDA Data

Status	2004	2005	2006	2007	2008	2009	Total
Owner-Occupied	178,254	209,709	186,396	123,126	86,048	94,303	877,836
Not Owner-Occupied	19,705	27,260	26,055	16,797	10,317	7,793	107,927
Not Applicable	1,421	1,062	759	492	481	217	4,432
Total	**199,380**	**238,031**	**213,210**	**140,415**	**96,846**	**102,313**	**990,195**

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; and
- "Loan purchased by the institution," which means that the previously originated loan was purchased on the secondary market.

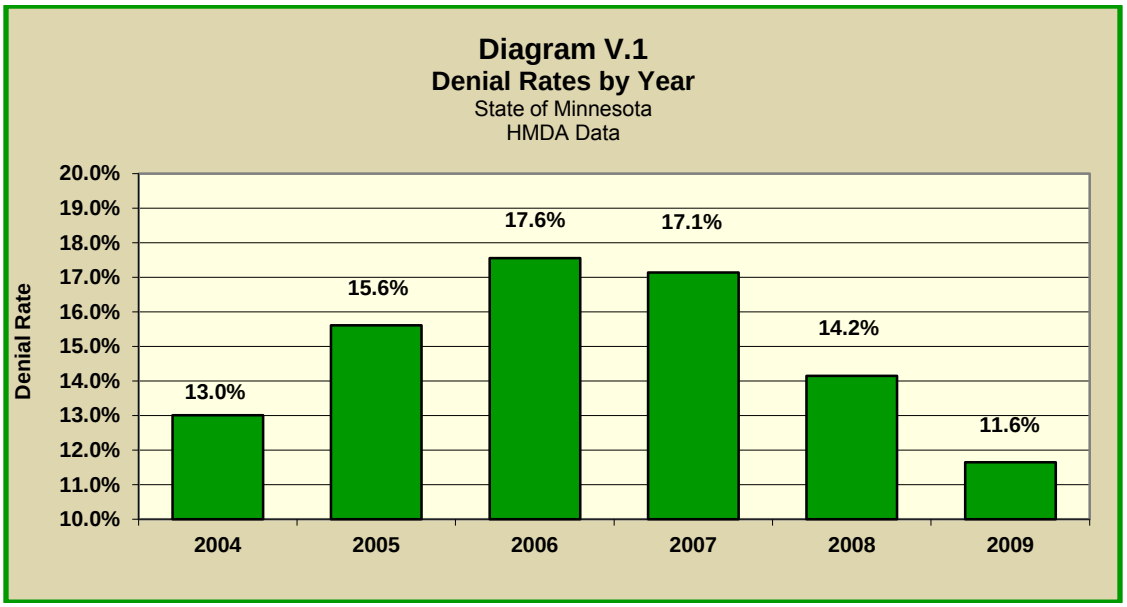
These outcomes were used to determine denial rates presented herein. For this analysis, only loan originations and loan denials were inspected as an indicator of the underlying success or failure of home purchase loan applicants. Altogether, there were 468,180 loan originations and 83,354 applications denied, for an average six-year denial rate of 15.1 percent, as seen below in Table V.3.

Table V.3
Owner-Occupied Home Purchase Loan Applications by Action Taken
State of Minnesota
HMDA Data

Action	2004	2005	2006	2007	2008	2009	Total
Loan Originated	101,316	110,110	94,059	63,172	48,877	50,646	468,180

Application Approved but not Accepted	9,929	12,227	11,905	6,747	5,072	3,167	49,047
Application Denied	15,153	20,372	20,032	13,064	8,058	6,675	83,354
Application Withdrawn by Applicant	9,962	14,259	11,092	6,549	5,312	5,121	52,295
File Closed for Incompleteness	2,186	3,779	2,944	1,803	1,214	1,103	13,029
Loan Purchased by the Institution	39,708	48,646	46,257	31,765	17,508	27,476	211,360
Preapproval Request Denied	0	287	18	23	6	95	429
Preapproval Approved but not Accepted	0	29	89	3	1	20	142
Total	**178,254**	**209,709**	**186,396**	**123,126**	**86,048**	**94,303**	**877,836**
Denial Rate	13.0%	15.6%	17.6%	17.1%	14.2%	11.6%	15.1%

Denial rates varied by year, as seen below in Diagram V.1. Overall, the number of loans denied in the state fell from a high of 17.6 percent in 2006 to a low of 11.6 percent in 2009.



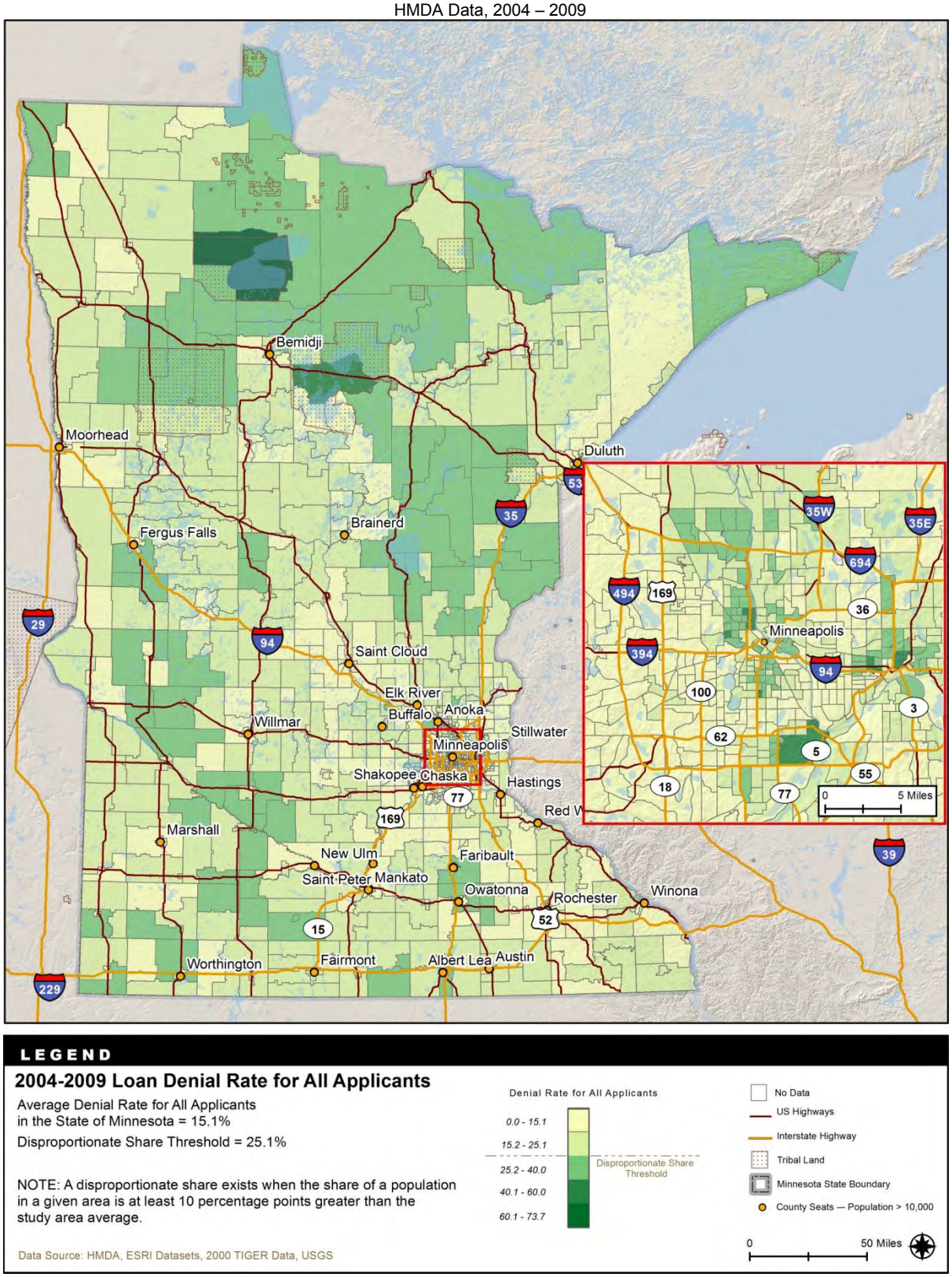
Importantly, denial rates were not evenly distributed throughout Minnesota. As shown in Map V.1, on the following page, numerous census tracts in the state had denial rates well above the statewide average of 15.1 percent, and several were higher than the 25.1 percent disproportionate share. Tracts with the highest denial levels were located in and around some of the tribal lands in the state as well as in the Twin Cities metro region.

HMDA data were also used to determine denial rates by gender. Table V.4, below, shows that, with applications in which gender was provided by the applicant, denial rates were uneven, with females experiencing slightly higher denial rates compared to males. On average, between 2004 and 2009, male applicants experienced a denial rate of 14.1 percent, while female applicants experienced a denial rate of 16.1 percent. Denial rates somewhat converged beginning in 2008.

Table V.4
Denial Rate for Owner-Occupied Home Purchase Loan Applications by Gender
State of Minnesota
HMDA Data

Year	Male	Female	Not Provided by Applicant	Not Applicable	Total
2004	11.9%	13.9%	26.7%	3.8%	13.0%
2005	14.5%	16.8%	25.2%	33.3%	15.6%
2006	16.4%	18.9%	25.3%	7.0%	17.6%
2007	16.0%	18.3%	26.9%	19.4%	17.1%
2008	13.3%	14.7%	25.0%	15.4%	14.2%
2009	11.3%	11.8%	18.4%	12.5%	11.6%
Total	**14.1%**	**16.1%**	**25.1%**	**15.2%**	**15.1%**

Map V.1
HMDA Denial Rate by Census Tract
State of Minnesota
HMDA Data, 2004 – 2009



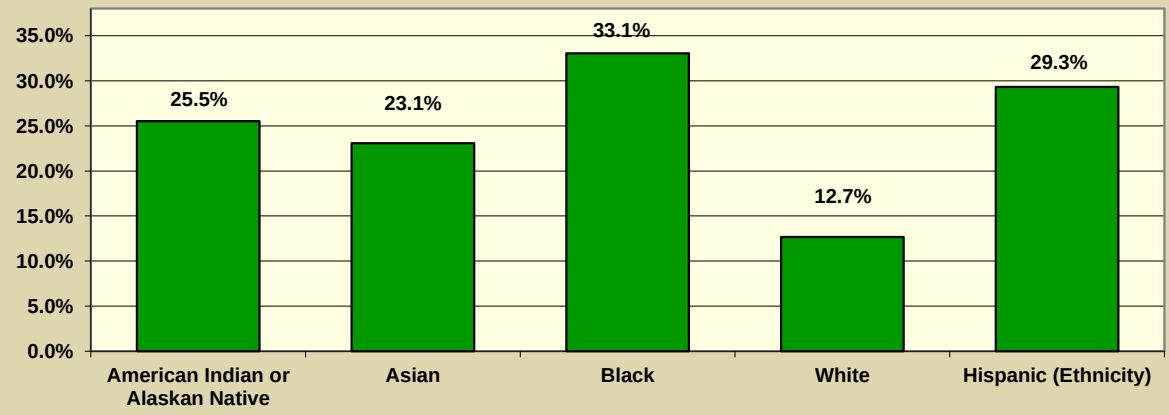
Denial rates were also calculated by race and ethnicity of loan applicants, and these data are presented below in Table V.5. As shown therein, most minority racial and ethnic applicants experienced higher denial rates than white applicants. In regard to race, black applicants had the highest denial rate during this time period, at 33.1 percent, followed by American Indian or Alaskan Native applicants, at a rate of 25.5 percent, and Asian applicants, at 23.1 percent. These rates compared to the white applicant denial rate of 12.7 percent. Hispanic applicants experienced a denial rate of 29.3 percent.

Table V.5
Percent Denial Rates by Race and Ethnicity
State of Minnesota
HMDA Data

Race	2004	2005	2006	2007	2008	2009	Total
American Indian or Alaskan Native	22.3%	25.0%	24.9%	34.4%	25.3%	21.5%	25.5%
Asian	18.1%	23.9%	27.0%	29.4%	20.8%	15.8%	23.1%
Black	24.2%	30.5%	38.0%	44.5%	33.2%	20.1%	33.1%
White	11.0%	12.9%	14.4%	13.9%	12.5%	10.7%	12.7%
Not Available	24.8%	26.7%	27.2%	27.5%	23.4%	17.6%	25.5%
Not Applicable	19.7%	21.7%	3.7%	17.9%	10.0%	9.1%	16.6%
Total	**13.0%**	**15.6%**	**17.6%**	**17.1%**	**14.2%**	**11.6%**	**15.1%**
Hispanic (Ethnicity)	23.3%	28.1%	33.2%	37.4%	29.7%	21.3%	29.3%

Diagram V.2, below, shows the differences in the overall denial rates by race and ethnicity in the State of Minnesota from 2004 through 2009.

Diagram V.2
Denial Rate by Race/Ethnicity for Owner-Occupied Home Purchase Loan Applications
State of Minnesota
HMDA Data, 2004 - 2009



Denial rates by race and ethnicity were plotted on several maps to examine concentration of loan denials.

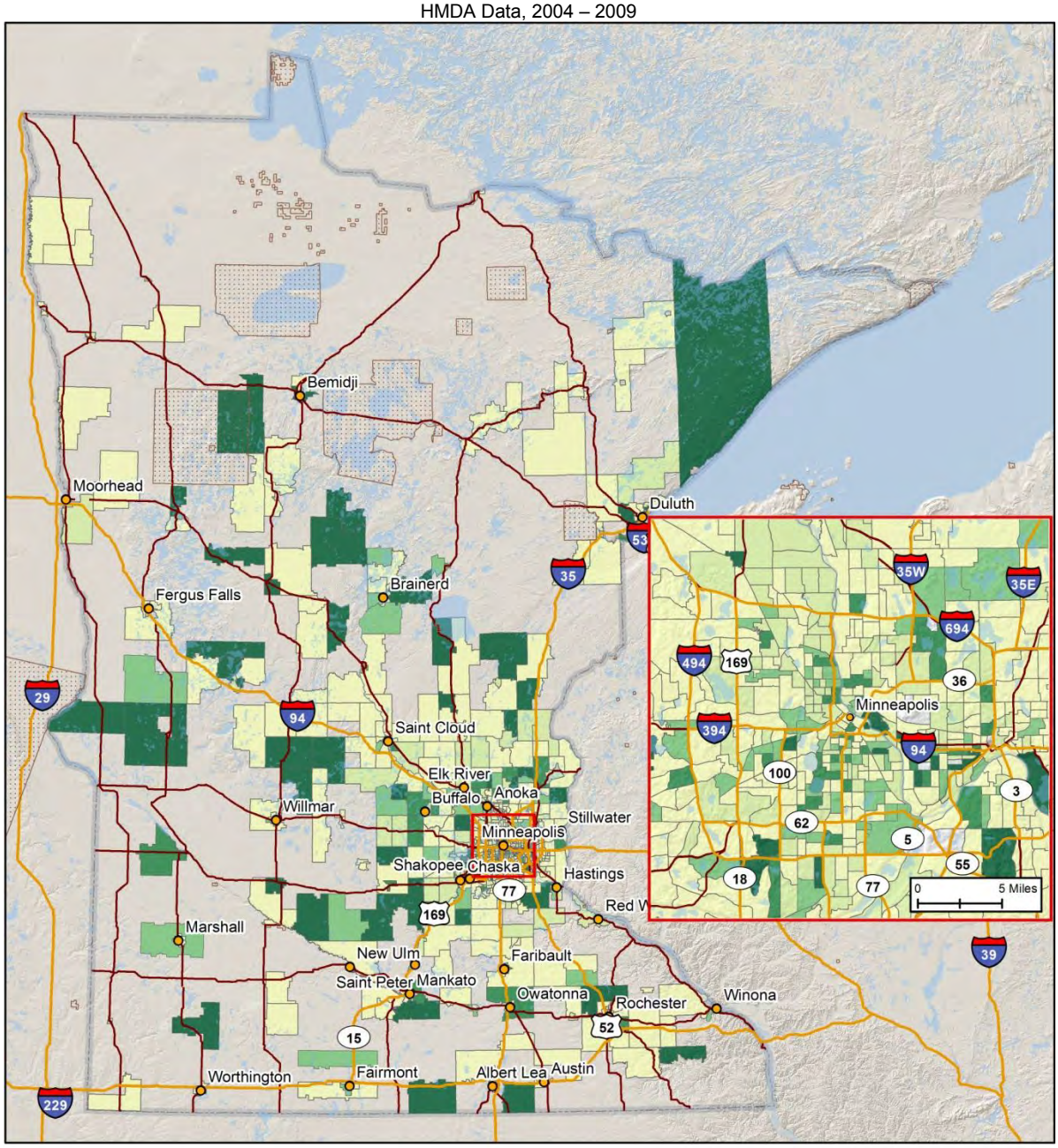
Data regarding the concentration of denial rates for black applicants in the State of Minnesota is presented on the following page in Map V.2. While, in some tracts, there were no loan applications or denials for black applicants, in other areas, denial rates were above the disproportionate share of 43.1 and as high as 100 percent. However, such extreme findings may represent total denial of very few applicants. Tracts with the highest concentrations were scattered throughout the Twin Cities metro area and the rest of the state.

Map V.3, on page 91, presents geographic data on denial rates for Asian applicants in the State of Minnesota. Again, several tracts scattered throughout the state demonstrated rates as high as 100 percent, although many of these tracts were outside of the Minneapolis area, where tracts predominately had denial rates below the average.

Map V.4, on page 92, shows home loan application denial rates in the State of Minnesota for American Indian applicants. The denial rate for the state was 25.5 percent, while denial rates for this group were as high as 100 percent in some areas. Again, this high rate can be representative of total denial of very few applicants. Regardless, areas with high rates of American Indian applicant denial were strewn throughout the state, although several tracts with high denial rates were clumped in the northern central part of the state in and around some tribal lands.

Data regarding denial rates for Hispanic ethnic applicants are presented on page 93 in Map V.5 and show that many census tracts in the state had denial rates in excess of the disproportionate share threshold of 39.3 percent and as high as 100 percent. Denial rates for Hispanic applicants tended to be higher outside of the metro region.

Map V.2
Denial Rate for Black Applicants by Census Tract
State of Minnesota
HMDA Data, 2004 – 2009



LEGEND

2004-2009 Loan Denial Rate for Black Applicants

Average Denial Rate for Black Applicants in the State of Minnesota = 33.1%

Disproportionate Share Threshold = 43.1%

NOTE: A disproportionate share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.

Denial Rate for Black Applicants

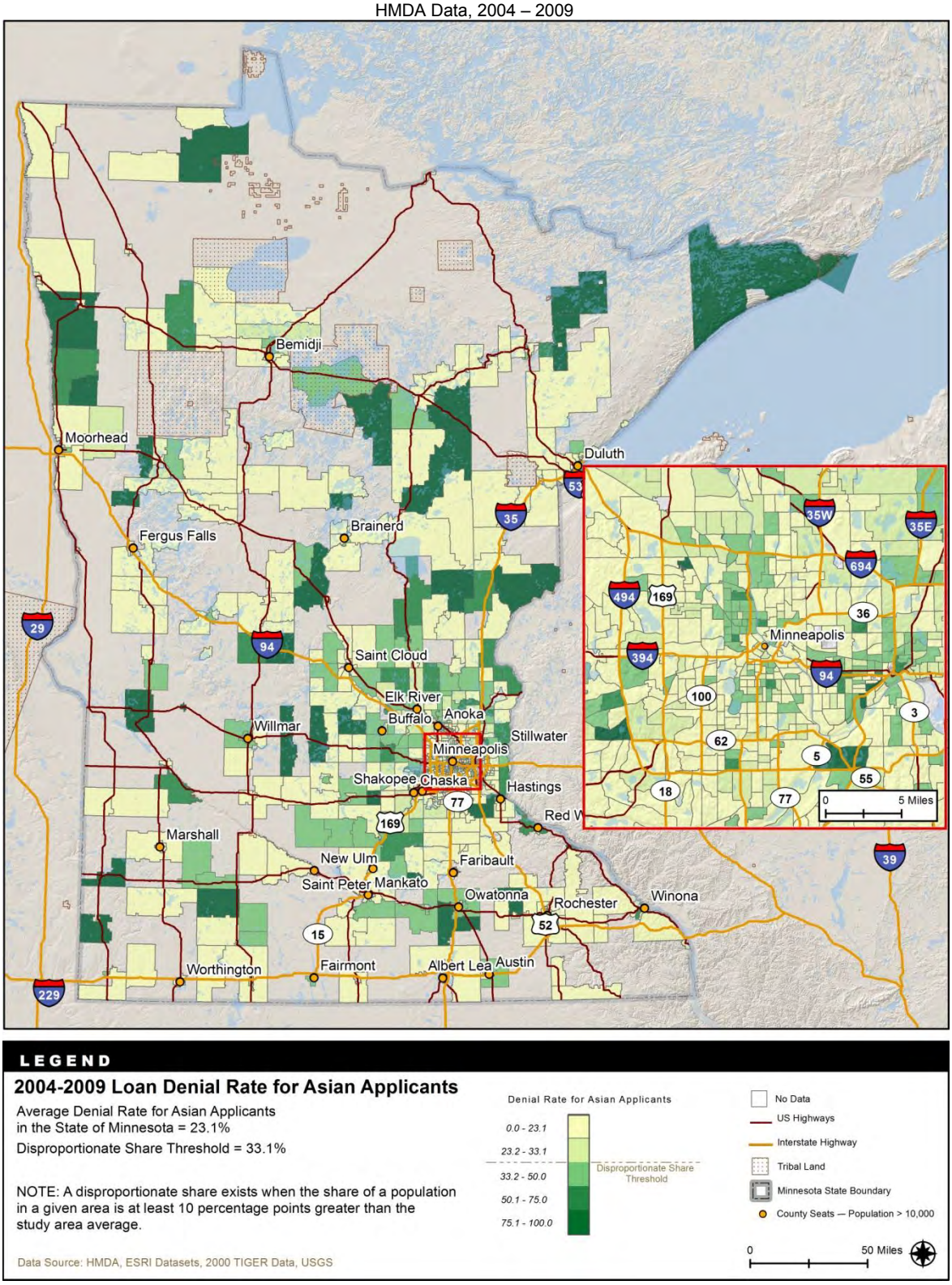
- 0.0 - 33.1
- 33.2 - 43.1
- Disproportionate Share Threshold
- 43.2 - 50.0
- 50.1 - 75.0
- 75.1 - 100.0

- No Data
- US Highways
- Interstate Highway
- Tribal Land
- Minnesota State Boundary
- County Seats — Population > 10,000

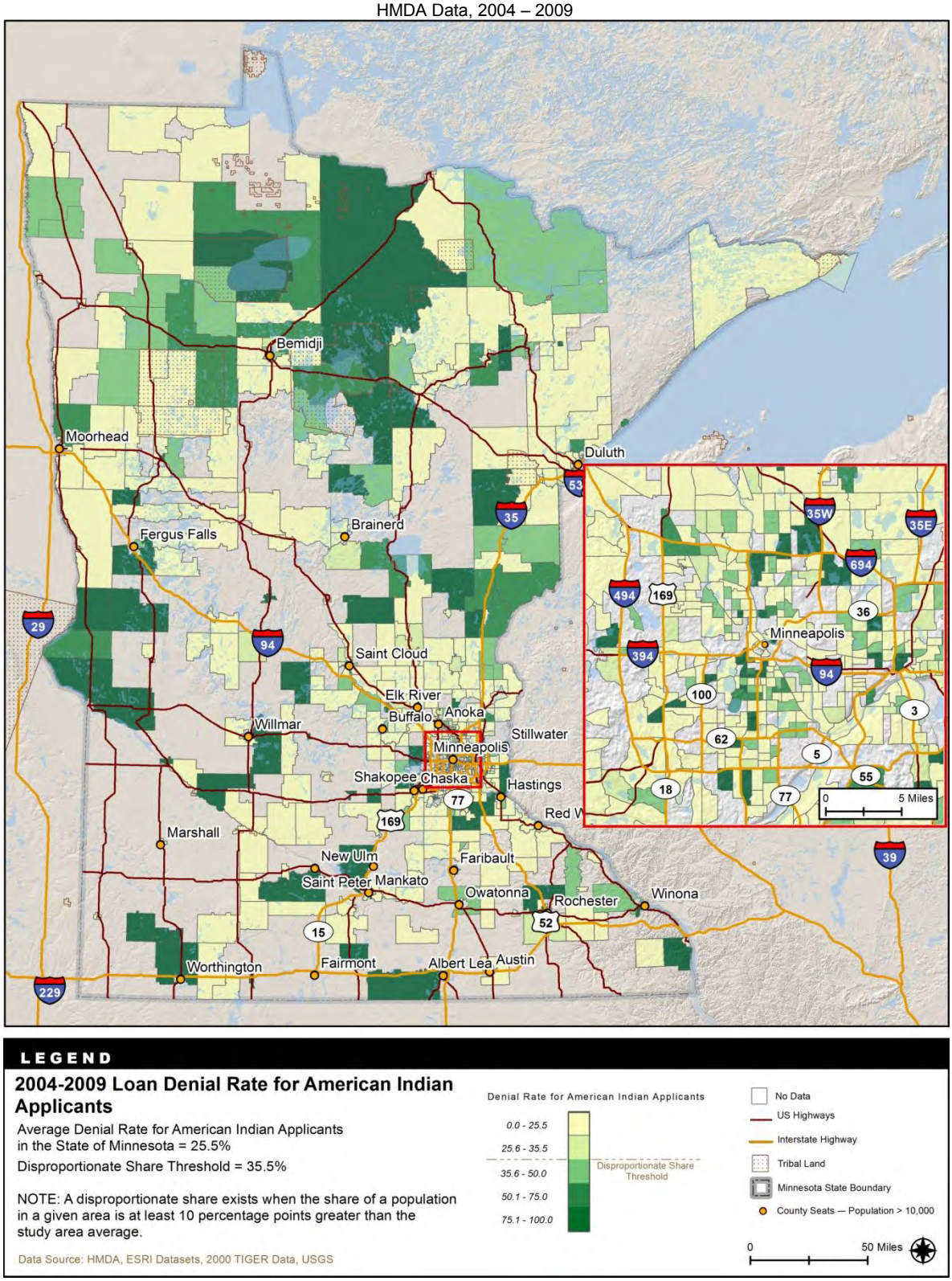
0 — 50 Miles

Data Source: HMDA, ESRI Datasets, 2000 TIGER Data, USGS

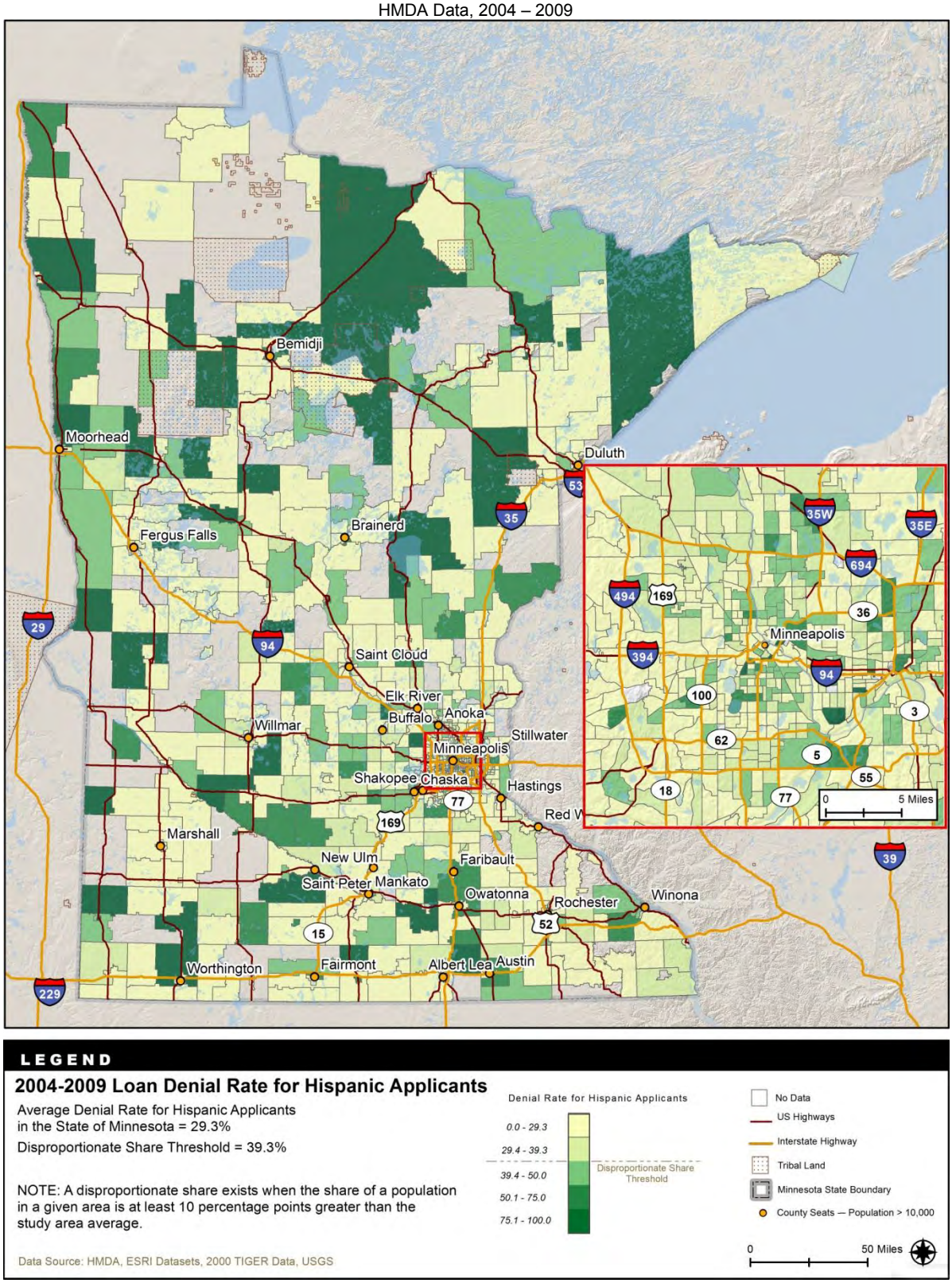
Map V.3
Denial Rate for Asian Applicants by Census Tract
State of Minnesota
HMDA Data, 2004 – 2009



Map V.4
Denial Rate for American Indian Applicants by Census Tract
State of Minnesota
HMDA Data, 2004 – 2009



Map V.5
Denial Rate for Hispanic Applicants by Census Tract
State of Minnesota
HMDA Data, 2004 – 2009



Part of the HMDA data includes information about the reason for a loan denial, although financial institutions are not uniformly required to fill out this field. Nevertheless, the most frequently cited categories of denials were credit history and debt-to-income ratio, as shown below in Table V.6. This problem could potentially be reduced through enhancing programs for consumers to better understand the importance of establishing good credit.

Table V.6
Owner-Occupied Home Purchase Loan Applications by Reason for Denial
State of Minnesota
HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	Total
Credit History	3,026	4,063	3,513	2,607	1,777	1,446	16,432
Debt-to-Income Ratio	2,194	2,221	2,114	1,867	1,558	1,374	11,328
Credit Application Incomplete	1,320	1,784	2,030	1,582	539	404	7,659
Collateral	1,100	1,401	1,483	1,104	1,122	1,006	7,216
Unverifiable Information	576	1,095	1,419	833	397	258	4,578
Employment History	362	442	413	245	223	189	1,874
Insufficient Cash	301	288	307	208	209	145	1,458
Mortgage Insurance Denied	5	8	5	16	46	24	104
Other	3,109	4,279	3,039	1,700	785	591	13,503
Missing	3,160	4,791	5,709	2,902	1,402	1,238	19,202
Total	**15,153**	**20,372**	**20,032**	**13,064**	**8,058**	**6,675**	**83,354**

Table V.7, below, shows denial rates by income for the State of Minnesota. As expected, households with lower incomes tended to be denied for loans more often. Households with incomes from $15,001 to $30,000 were denied an average of 26.6 percent of the time, while those with incomes above $75,000 were denied only 11.5 percent of the time on average.

Table V.7
Denial Rates by Income
State of Minnesota
HMDA Data

Income	2004	2005	2006	2007	2008	2009	Total
<= $15K	40.5%	49.8%	29.5%	54.9%	48.4%	60.7%	44.7%
$15,001 - $30K	24.2%	28.7%	28.9%	28.2%	28.8%	21.9%	26.6%
$30,001 - $45K	14.8%	17.5%	19.0%	17.8%	16.6%	12.4%	16.4%
$45,001 - $60K	13.2%	16.3%	18.0%	17.7%	14.3%	10.5%	15.4%
$60,001 - $75K	10.2%	13.5%	16.6%	15.5%	12.3%	9.5%	13.3%
Above $75K	8.7%	11.4%	14.6%	14.2%	9.7%	8.0%	11.5%
Data Missing	20.3%	20.9%	22.9%	24.4%	15.3%	13.3%	20.9%
Total	**13.0%**	**15.6%**	**17.6%**	**17.1%**	**14.2%**	**11.6%**	**15.1%**

Table V.8, on the following page, presents denial rates segmented by race or ethnicity and income. Even when correcting for income, minority racial and ethnic applicants often faced higher loan denial rates than white applicants. For example, black applicants experienced much higher loan denial rates than white applicants across all income levels; at income levels of $15,000 or below, black applicants had a denial rate of 62.1 percent compared to a

white denial rate of 44.7 percent, and at incomes over $75,000, black applicants had a denial rate of 33.9 percent compared to 9.2 percent for white applicants.

Table V.8
Percent Denial Rates of Owner-Occupied Home Purchase Loans by Race and Ethnicity by Income
State of Minnesota
HMDA Data, 2004 - 2009

Race	<= $15K	$15,001-$30K	$30,001-$45K	$45,001-$60K	$60,001-$75K	Above $75K	Data Missing	Total
American Indian or Alaskan Native	73.7%	44.6%	26.8%	22.7%	22.2%	18.5%	29.7%	25.5%
Asian	51.7%	34.2%	23.5%	23.3%	21.8%	21.3%	27.7%	23.1%
Black	62.1%	47.7%	32.3%	30.7%	31.4%	33.9%	36.0%	33.1%
White	44.7%	23.9%	14.2%	12.8%	10.6%	9.2%	16.5%	12.7%
Total	**44.7%**	**26.6%**	**16.4%**	**15.4%**	**13.3%**	**11.5%**	**20.9%**	**15.1%**
Hispanic (Ethnicity)	64.2%	40.7%	31.3%	28.5%	28.8%	23.2%	27.8%	29.3%

These findings correspond with "Communities in Crisis: Race and Mortgage Lending in the Twin Cities," published by the Institute on Race and Poverty (IRP) at the University of Minnesota Law School in February 2009. That study asserted that denials based on race continued to occur in the state.[83]

SUB-PRIME LENDING

In addition to modifications implemented in 2004 for documenting 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:

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

For the analysis presented herein, originated owner-occupied home purchase loans qualifying as HALs were identified for 2004 through 2009. These high-interest loans are considered predatory in nature. Table V.9, on the following page, shows that, between 2004 and 2009, there were 70,365 owner-occupied HALs originated in the State of Minnesota. Fortunately, the number of HALs decreased significantly after 2006, and by 2009, the overall rate of HALs was low, at 4.2 percent.

[83] "Communities in Crisis: Race and Mortgage Lending in the Twin Cities," Institute on Race and Poverty, February 2009

Table V.9
Originated Owner-Occupied Loans by Loan Purpose by HAL Status
State of Minnesota
HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	Total
Other Originated	90,617	84,226	72,366	56,526	45,584	48,496	397,815
High APR Loan	10,699	25,884	21,693	6,646	3,293	2,150	70,365
Total	**101,316**	**110,110**	**94,059**	**63,172**	**48,877**	**50,646**	**468,180**
Percent High APR	10.6%	23.5%	23.1%	10.5%	6.7%	4.2%	15.0%

Still, this figure is a measure of Minnesota's underlying foreclosure risk for recent homeowners, and it is important to examine characteristics of applicants who received these HALs in the six-year time period. As shown in Table V.10, below, the group with the greatest number of HALs between 2004 and 2009 was white applicants, with 51,485 such loans. Black applicants had 7,346 home purchase HALs, Asian applicants had 4,579, and American Indian applicants had 685 HALs, while Hispanic applicants received a total of 4,934 HAL-type loans over the six-year period. Fortunately, the number of HALs decreased from 2006 to 2009 for all racial and ethnic groups.

Table V.10
Owner-Occupied Home Purchase HALs Originated by Race and Ethnicity
State of Minnesota
HMDA Data

Race	2004	2005	2006	2007	2008	2009	Total
American Indian	149	230	193	53	35	25	685
Asian	564	1,878	1,544	412	106	75	4,579
Black	886	2,938	2,630	701	122	69	7,346
White	8,123	18,003	15,506	5,076	2,877	1,900	51,485
Not Available	965	2,831	1,816	402	151	79	6,244
Not Applicable	12	4	4	2	2	2	26
Total	**10,699**	**25,884**	**21,693**	**6,646**	**3,293**	**2,150**	**70,365**
Hispanic (Ethnicity)	723	1,847	1,720	442	140	62	4,934

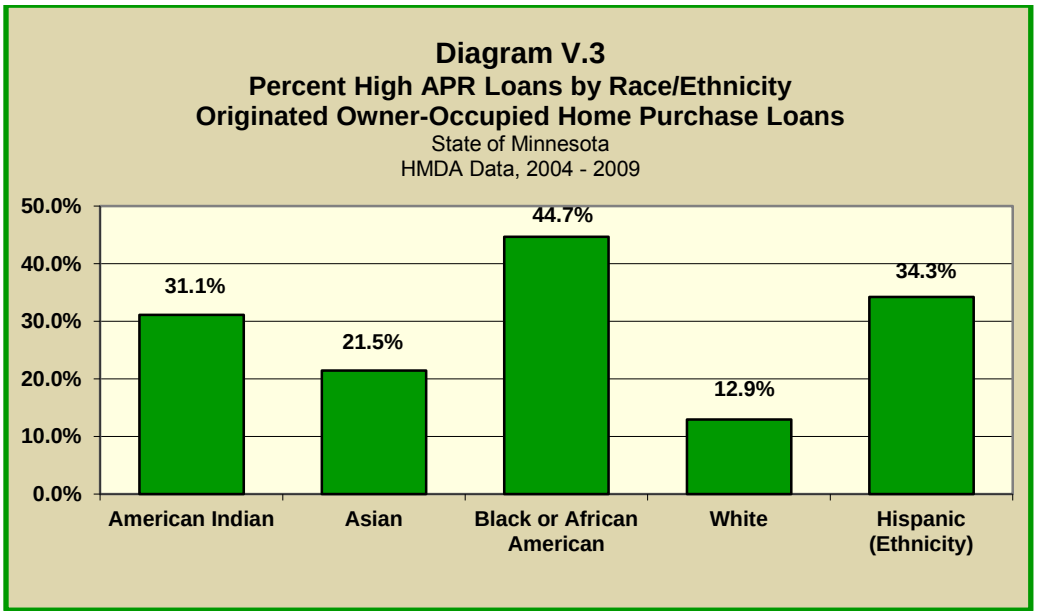
On the other hand, further evaluation of HMDA data revealed that an unusually high *proportion* of HALs was made to black, Hispanic, American Indian, and Asian applicants, as shown below in Table V.11. In total, nearly 45 percent of all loans taken by black applicants were HALs, while Hispanic borrowers received HAL loans at a rate of 34.3 percent, American Indian applicants experienced a rate of over 31 percent, and Asian applicants showed a rate of 21.5 percent. White applicants, however, received HALs at a rate of 12.9 percent.

Table V.11
Percent of HAL Owner-Occupied Home Purchase Loans Originated by Race and Ethnicity
State of Minnesota
HMDA Data

Race	2004	2005	2006	2007	2008	2009	Total
American Indian	29.1%	44.9%	43.6%	18.0%	16.0%	11.4%	31.1%
Asian	12.5%	34.9%	34.0%	16.1%	5.2%	3.3%	21.5%
Black	28.2%	60.9%	61.4%	36.2%	11.9%	5.6%	44.7%
White	9.4%	19.6%	19.8%	9.3%	6.7%	4.3%	12.9%

Total	**10.6%**	**23.5%**	**23.1%**	**10.5%**	**6.7%**	**4.2%**	**15.0%**
Hispanic (Ethnicity)	23.0%	45.3%	51.1%	26.1%	13.1%	5.9%	34.3%

Diagram V.3, below, shows the proportion of HALs issued to applicants by race and ethnicity and demonstrates that all other minority racial and ethnic applicants experienced HAL rates much higher than the white applicant rate of 12.9 percent.



The geographic distribution of HALs in the State of Minnesota is presented on page 99 in Map V.6. Several tracts within the state showed average HAL rates in excess of the disproportionate share threshold of 25 percent, and HAL rates as high as 80 percent were seen in the tribal lands in the northern central part of the state.

The concentration of HALs for black applicants is shown on page 100 in Map V.7. Tracts with the highest rates of HALs were scattered across the rural areas of the state with some as high as 100 percent, and tracts in the metro area also had rates above the disproportionate share of 54.7 percent. Many tracts showed HAL rates below average; however, the average rate of HALs to black applicants was high, at 44.7 percent. In tracts where no color is displayed, there were no HALs.

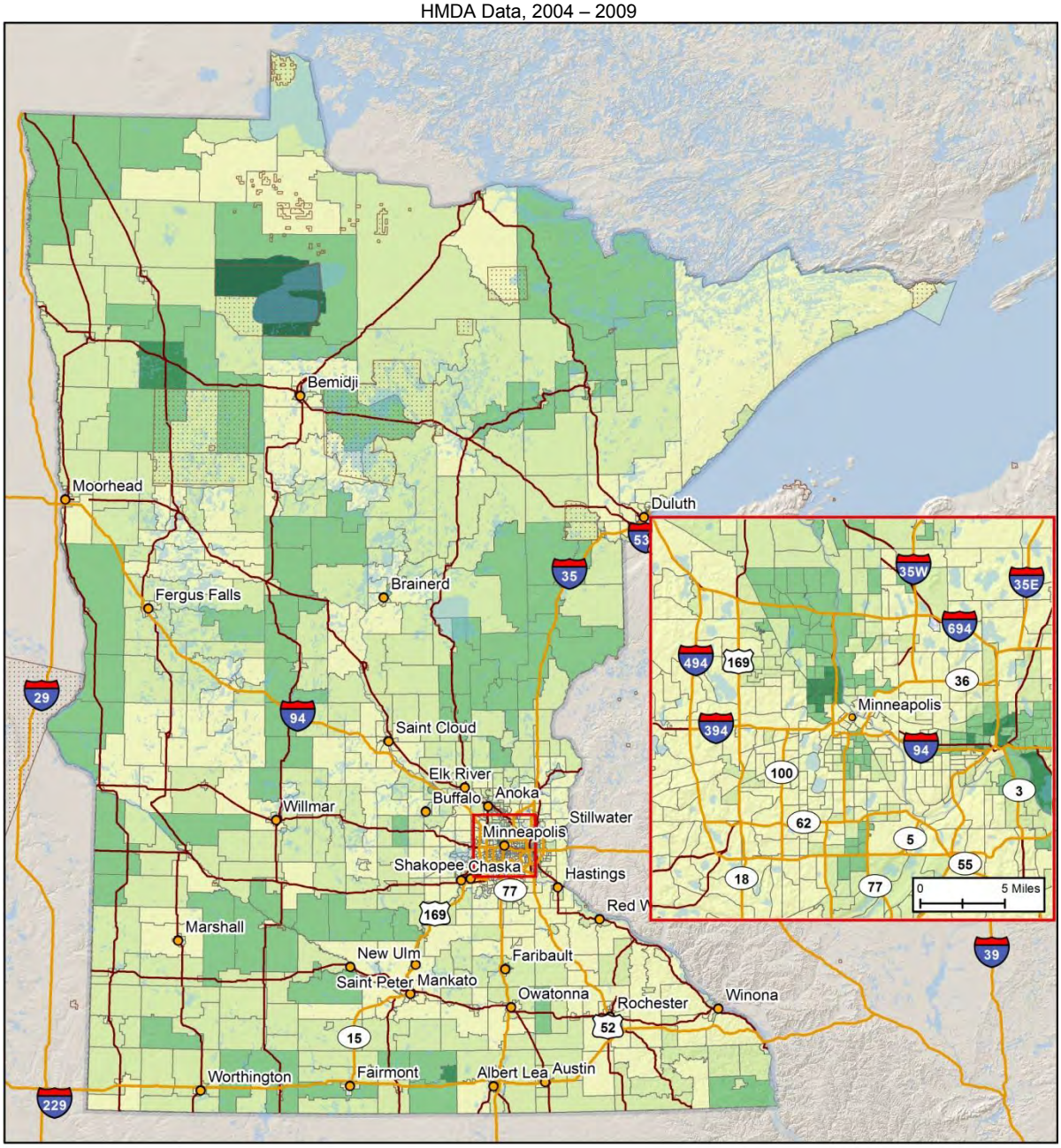
Data on the rate of HALs for Asian applicants is presented on page 101 in Map V.8. The rate of HALs to Asian applicants was lower than that to black applicants, at 21.5 percent. This map shows fewer tracts with disproportionate shares of HALs, but some tracts had up to a 100 percent rate of predatory loans. However, this rate may indicate a very small number of applicants who received HALs. HAL rates for Asian applicants were lower in more urbanized areas.

Map V.9, on page 102, presents the dispersal of HAL-type loans for American Indian applicants in the State of Minnesota. The proportion of HALs for American Indian applicants

were higher than the average of 31.1 percent across the state in both rural and urban areas, reaching up to 100 percent in some tracts. Many tracts in the Minneapolis and St. Paul area did not report any American Indian applicants who received HALs.

HALs for Hispanic ethnic applicants are presented on page 103 in Map V.10, which shows that tracts with high HAL rates were scattered throughout the state and mixed with tracts with a lower-than-average proportion of HALs. Tracts with shares of HALs above the disproportionate share threshold of 44.3 tended to be located outside of urban areas, although there were some tracts in the Minneapolis/St. Paul area that were exceptions to this rule.

Map V.6
Rate of HAL Loans by Census Tract
State of Minnesota
HMDA Data, 2004 – 2009



LEGEND

2004-2009 Rate of HALs to All Applicants

Average Rate of HALs to All Applicants in the State of Minnesota = 15.0%

Disproportionate Share Threshold = 25.0%

NOTE: A disproportionate share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.

Rate of HALs to All Applicants

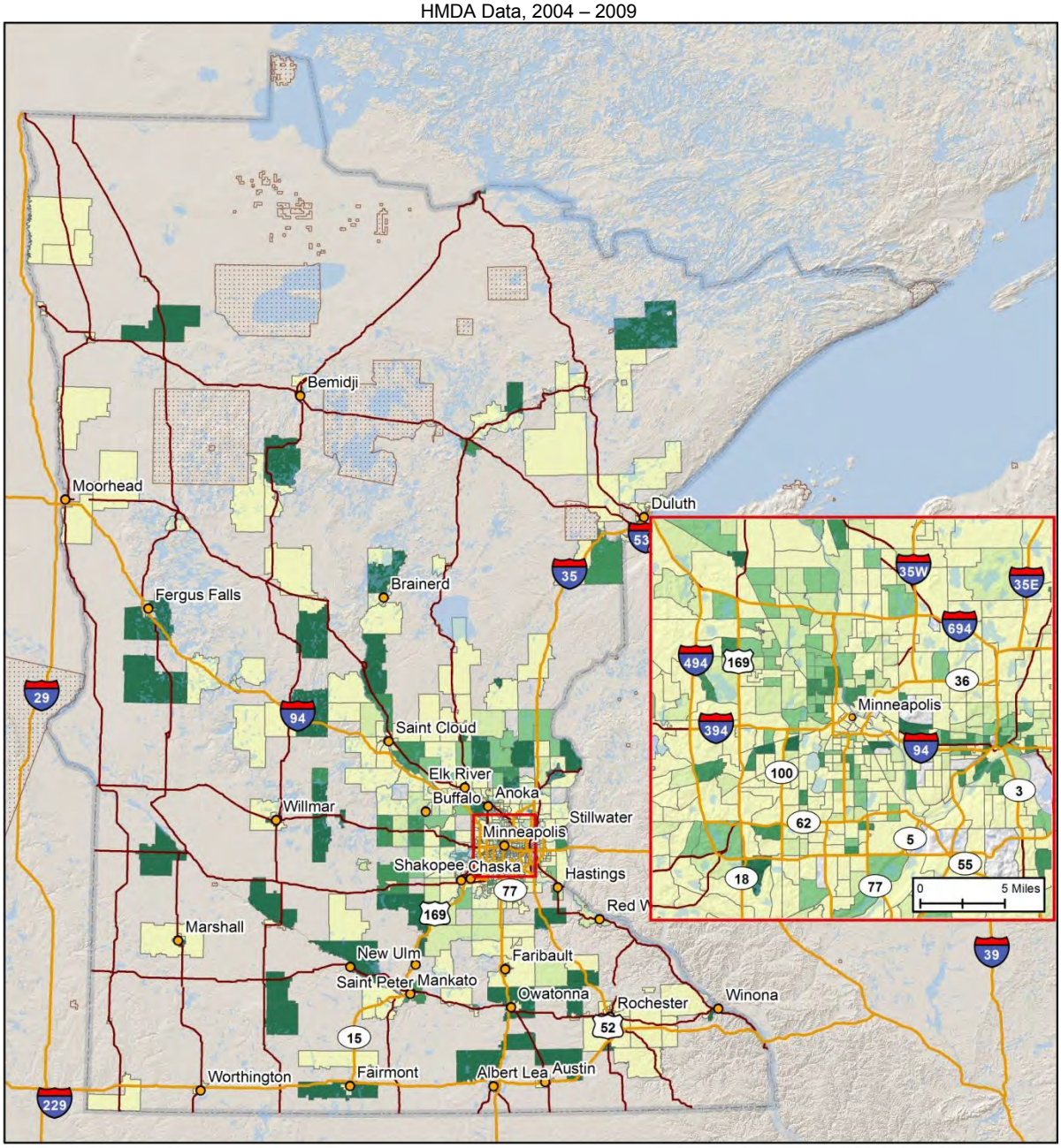
- 0.0 - 15.0
- 15.1 - 25.0
- Disproportionate Share Threshold
- 25.1 - 45.0
- 45.1 - 65.0
- 65.1 - 80.0

- No Data
- US Highways
- Interstate Highway
- Tribal Land
- Minnesota State Boundary
- County Seats — Population > 10,000

0 — 50 Miles

Data Source: HMDA, ESRI Datasets, 2000 TIGER Data, USGS

Map V.7
Rate of HALs for Black Applicants by Census Tract
State of Minnesota
HMDA Data, 2004 – 2009



LEGEND

2004-2009 Rate of HALs to Black Applicants

Average Rate of HALs to Black Applicants in the State of Minnesota = 44.7%

Disproportionate Share Threshold = 54.7%

NOTE: A disproportionate share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.

Rate of HALs to Black Applicants

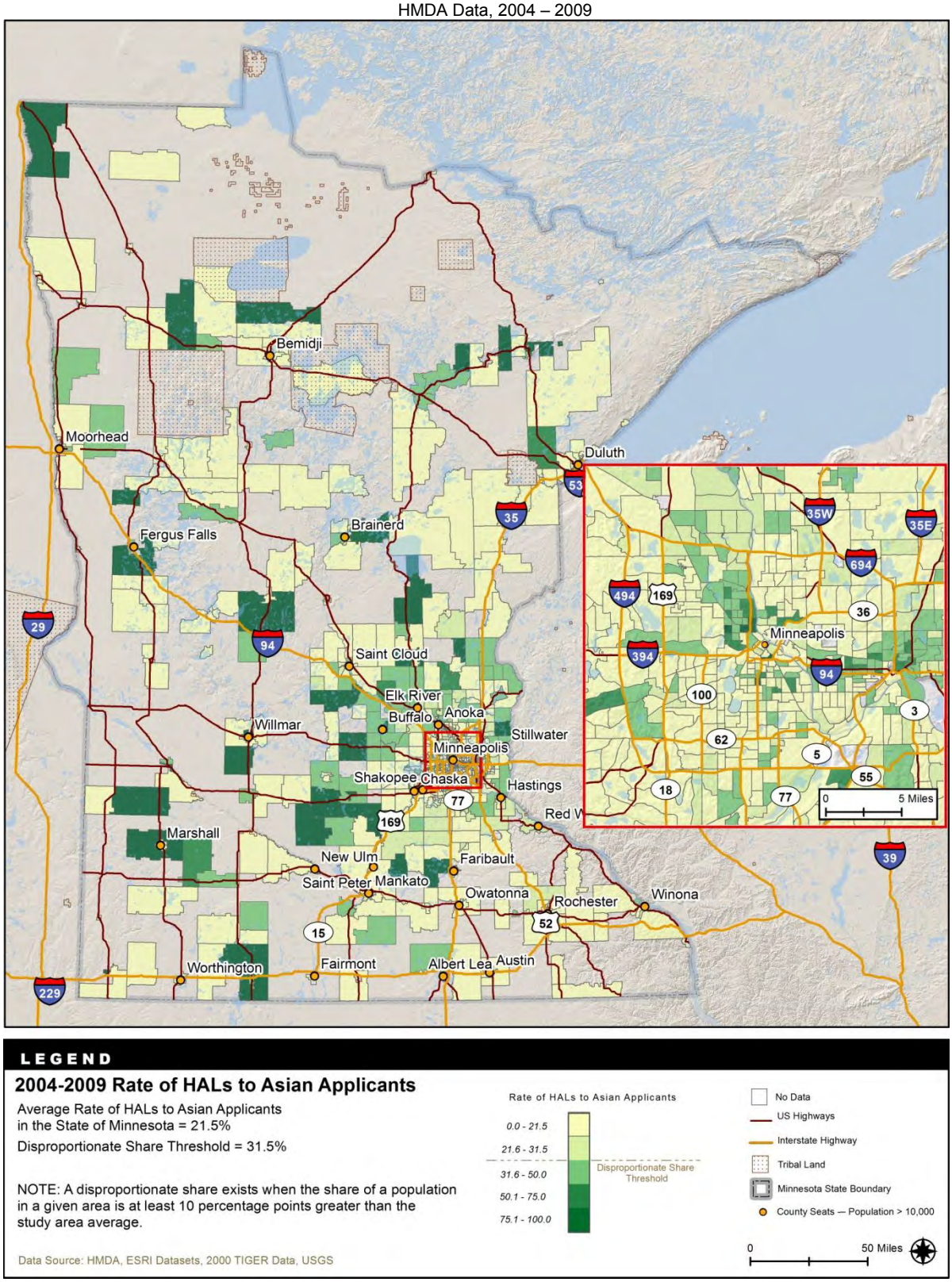
- 0.0 - 44.7
- 44.8 - 54.7
- Disproportionate Share Threshold
- 54.8 - 65.0
- 65.1 - 85.0
- 85.1 - 100.0

- No Data
- US Highways
- Interstate Highway
- Tribal Land
- Minnesota State Boundary
- County Seats — Population > 10,000

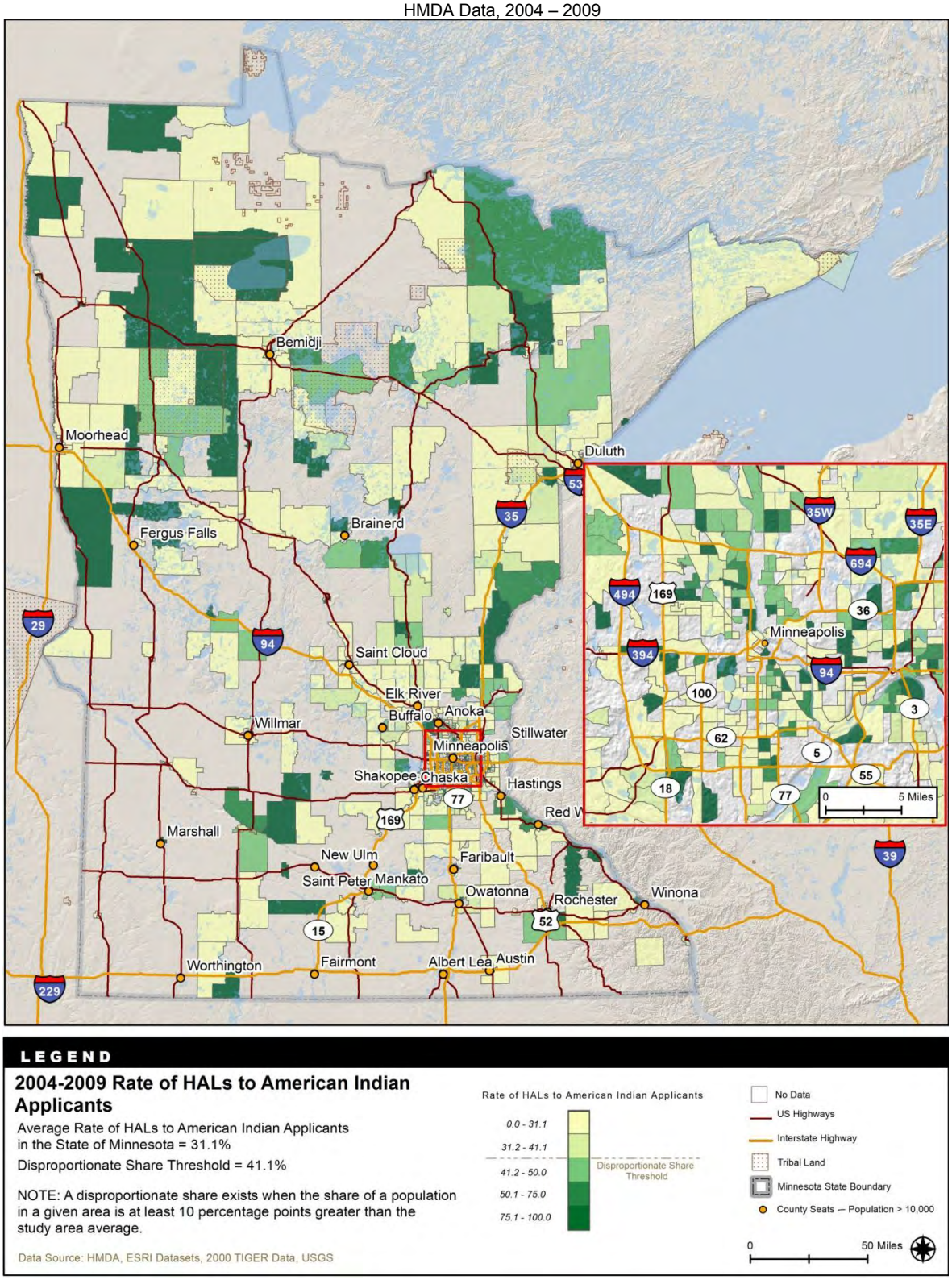
0 — 50 Miles

Data Source: HMDA, ESRI Datasets, 2000 TIGER Data, USGS

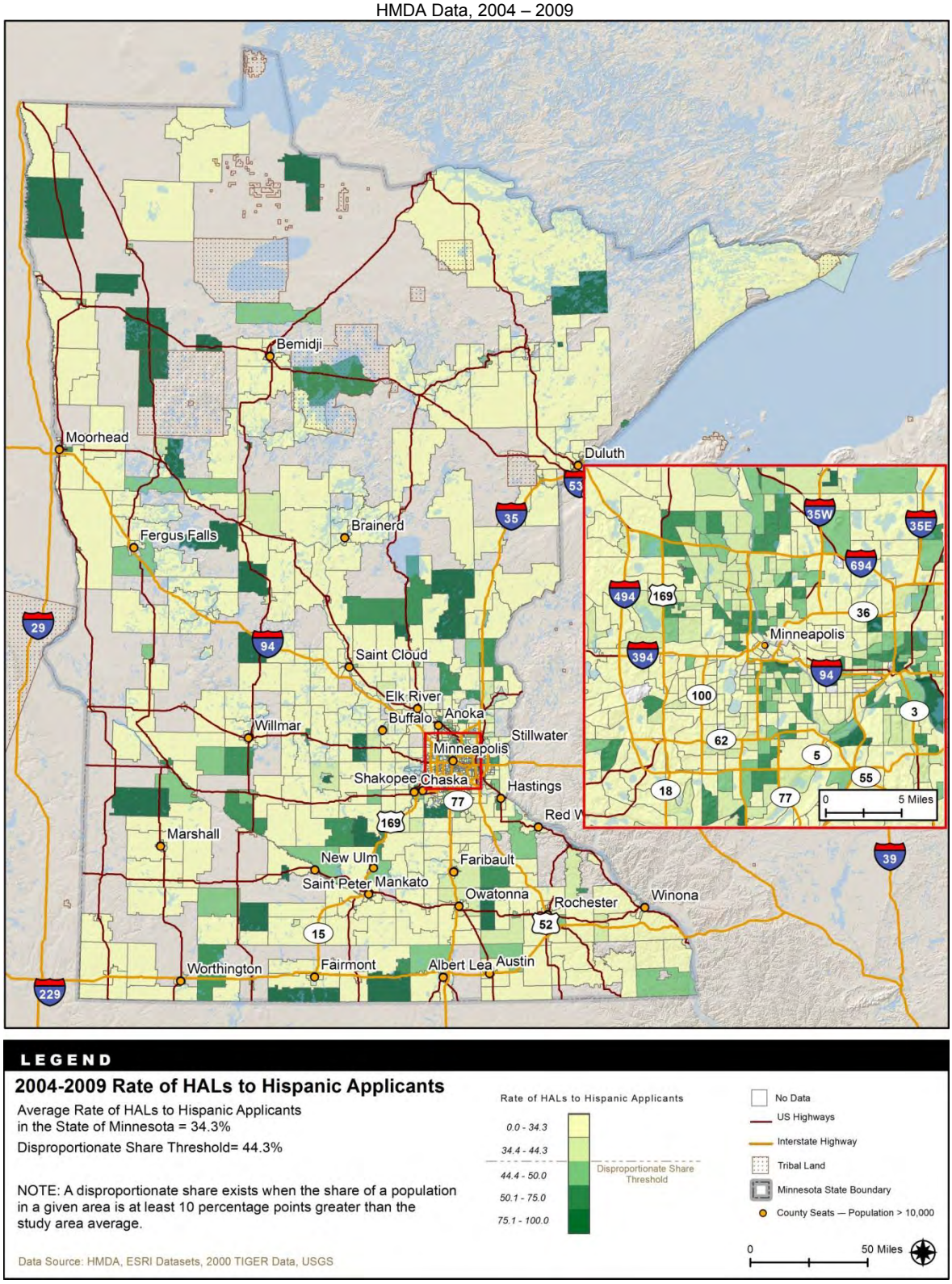
Map V.8
Rate of HALs for Asian Applicants by Census Tract
State of Minnesota
HMDA Data, 2004 – 2009



Map V.9
Rate of HALs for American Indian Applicants by Census Tract
State of Minnesota
HMDA Data, 2004 – 2009



Map V.10
Rate of HALs for Hispanic Applicants by Census Tract
State of Minnesota
HMDA Data, 2004 – 2009

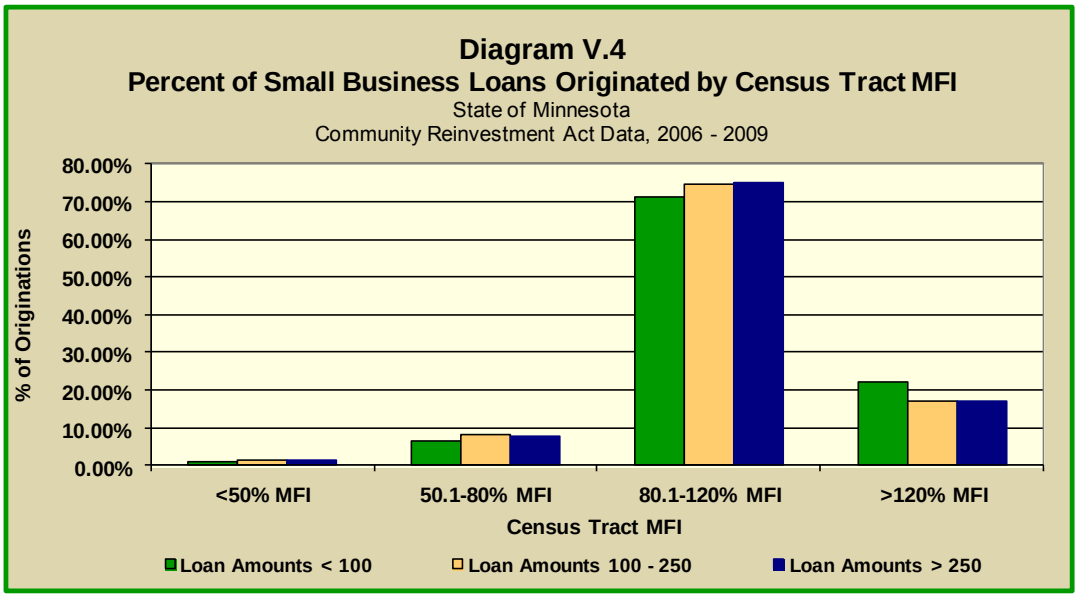


COMMUNITY INVESTMENT

Economic aid to businesses can be measured through the Community Reinvestment Act (CRA) data. The CRA was enacted in 1977 and is intended to encourage lending institutions to meet the credit needs of the communities in which they operate, including low- and moderate-income areas. Along with HMDA data, presented previously, the Federal Financial Institutions Examination Council also releases data mandated by the CRA.

Examination of CRA data revealed that 572,180 small business loans were extended to businesses in the State of Minnesota between 2006 and 2009. Of these, 185,194 went to businesses with annual revenues of less than $1 million. Of all loans, most were valued under $100,000, although a substantial number of loans represented values in excess of $1 million. Tables with complete CRA data are presented in Appendix C.

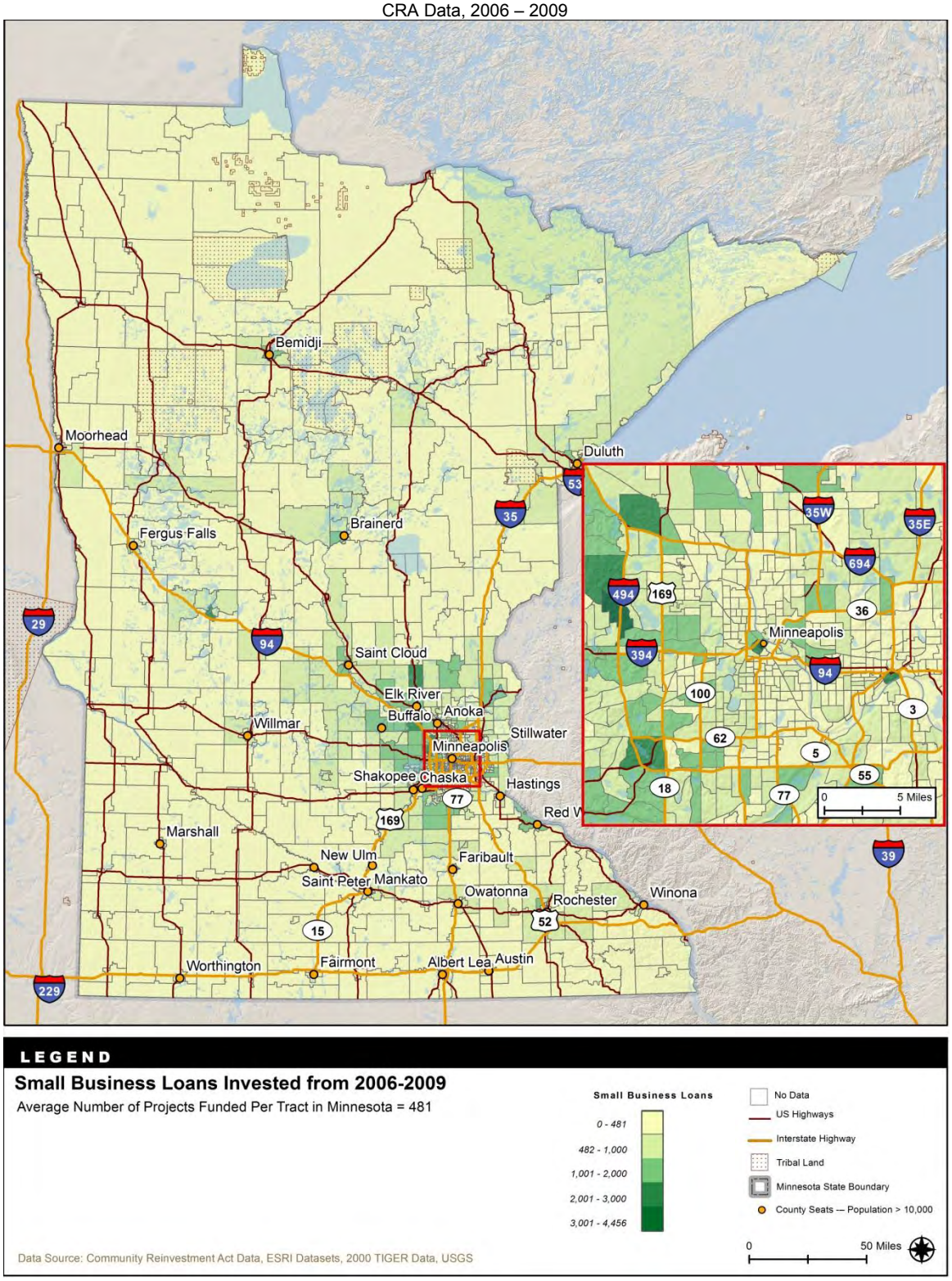
These loans were also analyzed to determine the location of funding in relation to Median Family Income (MFI) levels. Diagram V.4, below, shows the distribution of small business loans by value and by census tract MFI and demonstrates that very few of these loans were directed to areas with an MFI below 50 percent, or between 50.1 and 80 percent MFI, despite the fact that these loans were designed to aid low- and moderate-income areas.



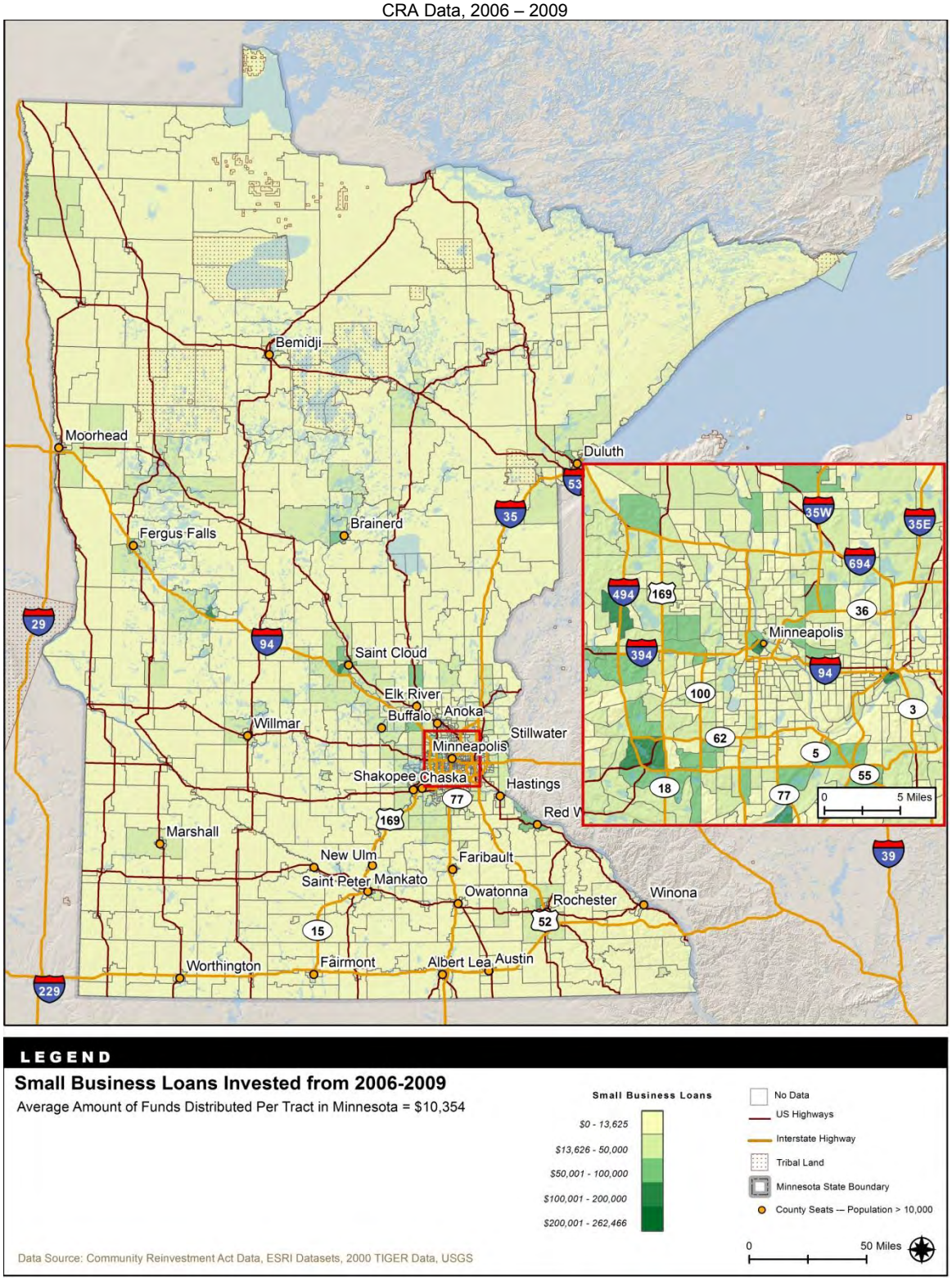
Map V.11, on the following page, illustrates the number of loans issued to businesses in the state from 2006 through 2009 and shows that tracts outside the central Twin Cities and surrounding the metro region received the greatest number of loans. Map V.12, on page 106, illustrates the dispersal of loan funding for businesses by loan amount and shows that the highest community funding amounts were seen in Minneapolis suburbs. Tracts that received the most funding were not necessarily tracts with the highest number of projects. When comparing Map V.12 with Map II.11, which previously presented recent poverty data, it can be seen that the areas that received high CRA small business loan funding did not

coincide with the areas that demonstrated higher levels of poverty such as in the tribal lands and the central Twin Cities metro area; in fact, they were sometimes inverses of each other.

Map V.11
Number of Small Business Loans
State of Minnesota
CRA Data, 2006 – 2009



Map V.12
Value of Small Business Loans
State of Minnesota
CRA Data, 2006 – 2009



FAIR HOUSING COMPLAINTS

COMPLAINTS FILED WITH THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

HUD maintains records of complaints that represent violations of federal housing law. Over the January 2004 through June 2011 period, HUD reported a total of 682 complaints filed from within the State of Minnesota, as shown below in Table V.12. The total number of complaints ranged from a high of 106 in 2006 to a low of 76 in 2005, excluding 2011 as a partial year.

This table also presents complaint data by basis, or the protected class status of the person allegedly aggrieved in the complaint. Complainants may cite more than one basis, so the number of bases cited can exceed the total number of complaints. As shown therein, a total of 857 bases were cited in relation to the 682 complaints filed. Disability was the most commonly cited basis in the complaints, with 319, followed by race, with 251. Familial status and national origin were cited 91 and 75 times, respectively.

Table V.12
Fair Housing Complaints by Basis
State of Minnesota
HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	6/2011	Total
Disability	29	39	46	39	44	43	55	24	319
Race	34	29	42	34	22	42	31	17	251
Familial Status	16	6	13	13	12	7	15	9	91
National Origin	7	10	22	2	5	14	11	4	75
Sex	11	4	9	5	4	5	5	1	44
Retaliation	6	1	6	2	1	7	3	1	27
Color	7	.	3	.	.	6	1	2	19
Sexual Harassment	6	2	3	1	1	2	3	.	18
Religion	1	3	3	2	1	1	1	1	13
Total Bases	**117**	**94**	**147**	**98**	**90**	**127**	**125**	**59**	**857**
Total Complaints	89	76	106	83	85	97	102	44	682

The issues, or alleged discriminatory actions related to each complaint, are presented in Table V.13, on the following page. In the same way that bases are reported, more than one issue may be associated with each complaint. In this case, 1,056 issues were cited, with discrimination in terms, conditions, or privileges relating to rental cited 224 times; failure to make reasonable accommodation cited 164 times; discriminatory terms, conditions, privileges, or services and facilities cited 150 times; discriminatory acts under Section 818, which refers to issues of intimidation or coercion, was cited 140 times; and discriminatory refusal to rent was cited 121 times. The most commonly cited issues in this complaint data set related predominantly to rental transactions, which suggests that discriminatory acts

leading to the filing of fair housing complaints were more commonly associated with the rental market.

Table V.13
Fair Housing Complaints by Issue
State of Minnesota
HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	Total
Discriminatory terms, conditions, or privileges relating to rental	24	31	49	31	17	29	29	14	224
Failure to make reasonable accommodation	14	12	23	21	31	25	24	14	164
Discriminatory terms, conditions, privileges, or services and facilities	13	6	16	13	22	30	33	17	150
Discriminatory acts under Section 818 (coercion, Etc.)	23	22	26	12	7	13	23	14	140
Discriminatory refusal to rent	16	11	18	23	13	13	22	5	121
Otherwise deny or make housing available	1	.	1	2	2	5	24	18	53
Discriminatory advertising, statements, and notices	4	3	11	3	6	7	8	8	50
Discriminatory refusal to rent and negotiate for rental	9	4	4	3	3	5	6	3	37
Discrimination in services and facilities relating to rental	3	3	3	.	.	2	7	1	19
False denial or representation of availability - rental	4	.	2	.	.	2	6	1	15
Discriminatory financing (includes real estate transactions)	1	4	1	2	.	1	4	1	14
Discriminatory refusal to negotiate for rental	2	1	1	2	3	1	1	1	12
Other discriminatory acts	6	1	.	1	.	1	1	.	10
Discrimination in the making of loans	2	1	.	.	2	.	.	.	5
Discrimination in the terms/conditions for making loans	1	.	.	.	.	.	4	.	5
Steering	2	1	.	1	.	.	1	.	5
Using ordinances to discriminate in zoning and land use	1	.	.	1	1	1	1	.	5
Discriminatory terms, conditions, or privileges relating to sale	1	.	2	.	.	.	.	1	4
Discriminatory refusal to sell and negotiate for sale	.	.	2	.	.	1	.	.	3
False denial or representation of availability	.	.	.	.	1	1	.	.	2
Discrimination in terms and conditions of membership	1	.	.	.	1	.	.	.	2
Restriction of choices relative to a rental	1	.	.	.	1	.	.	.	2
Failure to provide usable doors	.	.	1	.	.	.	1	.	2
Failure to meet senior housing exemption criteria (55+)	2	.	.	.	.	.	.	.	2
Discriminatory advertisement - rental	1	.	.	.	.	.	.	.	1
Discrimination in services and facilities relating to sale	.	.	.	.	1	.	.	.	1
Adverse action against an employee	.	1	.	.	.	.	.	.	1
Refusal to provide municipal services or property	.	1	.	.	.	.	.	.	1
Failure to provide accessible and usable public and common user areas	.	.	1	.	.	.	.	.	1
Failure to provide accessible light switches, electric outlets, etc.	.	.	.	.	.	1	.	.	1
Failure to provide usable kitchens and bathrooms	.	.	.	.	.	1	.	.	1
Other non-compliance with design and construction requirements	.	.	1	.	.	.	.	.	1
Discriminatory acts under Section 901 (criminal)	.	.	1	.	.	.	.	.	1
Failure to permit reasonable modification	.	.	.	.	1	.	.	.	1
Total Issues	**132**	**102**	**163**	**115**	**112**	**139**	**195**	**98**	**1,056**
Total Complaints	89	76	106	83	85	97	102	44	682

Housing complaints filed with HUD can also be examined by closure status. Of the 682 total complaints, 193 were found to have a no cause determination, which means that discrimination was not found. In an additional 132 complaints, cause was found, and these complaints were successfully conciliated or settled. The rate of successful conciliation varied slightly throughout the time period and ranged from a high of 23.5 percent of complaints in 2008 to only 15.7 percent in 2007. These data are presented on the following page in Table V.14.

Table V.14
Fair Housing Complaints by Closure
State of Minnesota
HUD Data

Closure	2004	2005	2006	2007	2008	2009	2010	2011	Total
No cause determination	34	33	35	27	20	31	13	0	193
Conciliation/settlement successful	16	13	22	13	20	22	23	3	132
Complaint withdrawn by complainant after resolution	16	7	14	8	11	18	13	7	94
Complainant failed to cooperate	6	6	20	13	18	7	13	1	84
Complaint withdrawn by complainant without resolution	7	7	8	6	7	7	8	2	52
Dismissed for lack of jurisdiction	6	3	2	6	3	4	8	2	34
Unable to locate complainant	0	2	3	2	1	1	2	0	11
Untimely filed	1	3	0	3	2	1	0	0	10
Election made to go to court	0	1	0	4	0	1	0	0	6
Closed because trial has begun	1	0	2	0	1	0	0	0	4
ALJ consent order entered after issuance of charge	0	1	0	0	0	0	0	0	1
DOJ dismissal	0	0	0	0	1	0	0	0	1
DOJ settlement	1	0	0	0	0	0	0	0	1
Still open	1	0	0	1	1	5	22	29	59
Total Complaints	**89**	**76**	**106**	**83**	**85**	**97**	**102**	**44**	**682**

Table V.15, below, presents details regarding the complaints found with cause and successfully conciliated or settled. Of the 132 complaints found to be with cause, there were 161 bases cited, with 66 related to disability, 41 related to race, 19 to familial status, and 14 related to national origin, with the few remaining complaints spread across several other bases.

Table V.15
Fair Housing Complaints Successfully Conciliated or Settled by Basis
State of Minnesota
HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	Total
Disability	5	7	11	5	9	12	14	3	66
Race	8	3	8	3	4	7	8	.	41
Familial Status	2	1	3	3	6	.	4	.	19
National Origin	4	2	2	.	1	4	1	.	14
Retaliation	.	.	2	1	.	3	.	.	6
Sex	2	.	1	1	1	.	.	.	5
Color	2	.	.	.	.	2	.	.	4
Sexual Harassment	.	.	2	.	1	.	1	.	4
Religion	1	1	.	.	.	.	.	.	2
Total Bases for Complaints with Cause	**24**	**14**	**29**	**13**	**22**	**28**	**28**	**3**	**161**
Total Complaints with Cause	16	13	22	13	20	22	23	3	132

Table V.16, on the following page, shows the successful complaints separated by issue. Failure to make reasonable accommodation; discrimination in terms, conditions, or privileges relating to rental; discriminatory refusal to rent; and discriminatory terms, conditions, privileges, or services and facilities were all commonly cited in the complaints found to be with cause.

Table V.16
Fair Housing Complaints Found with Cause by Issue
State of Minnesota
HUD Data

Issues	2004	2005	2006	2007	2008	2009	2010	2011	Total
Failure to make reasonable accommodation	4	4	5	5	10	8	7	3	46
Discrimination in terms/conditions/privileges relating to rental	2	5	8	3	2	9	4	1	34
Discriminatory refusal to rent	5	2	2	4	6	1	9	0	29
Discriminatory terms, conditions, privileges, or services and facilities	1	2	5	2	4	8	6	0	28
Discriminatory acts under Section 818 (coercion, Etc.)	2	3	5	0	2	3	1	0	16
Discriminatory refusal to rent and negotiate for rental	3	0	3	1	1	0	2	0	10
Discrimination in services and facilities relating to rental	2	1	1	0	0	0	4	1	9
Discriminatory advertising, statements and notices	0	0	3	0	3	1	2	0	9
Otherwise deny or make housing available	0	0	1	0	0	0	3	0	4
False denial or representation of availability - rental	1	0	1	0	0	0	1	0	3
Discriminatory refusal to sell and negotiate for sale	0	0	1	0	0	0	0	0	1
Steering	0	0	0	1	0	0	0	0	1
Other discriminatory acts	0	0	0	0	0	0	1	0	1
Total Issues for Complaints with Cause	**20**	**17**	**35**	**16**	**28**	**30**	**40**	**5**	**191**
Total Complaints with Cause	16	13	22	13	20	22	23	3	132

COMPLAINTS FILED WITH THE MINNESOTA DEPARTMENT OF HUMAN RIGHTS

Complaint data was also received from the Minnesota Department of Human Rights (DHR). Table V.17, below, shows that a total of 256 complaints were filed with this agency between 2004 and 2010. The number of complaints varied per year, with the highest number of complaints filed in 2008 and the fewest complaints filed in 2010. In contrast to the HUD data presented previously, race was the most commonly cited basis in DHR data, followed by disability, sex, and national origin.

Table V.17
Fair Housing Complaints by Basis
State of Minnesota
Department of Human Rights Data

Basis	2004	2005	2006	2007	2008	2009	2010	Total
Race	15	20	5	14	18	18	11	101
Disability	16	15	8	10	21	18	9	97
Sex	13	4	11	2	7	2	5	44
National Origin	9	3	1	4	7	4	2	30
Public Assistance	2	1	7	1	3	5	3	22
Sexual Orientation	5	2	1	3	2	.	1	14
Marital Status	.	2	2	.	5	.	1	10
Religion	1	.	2	1	3	.	2	9
Familial Status	2	2	1	1	2	.	.	8
Reprisal	2	1	.	.	.	.	.	3
Color	2	.	.	.	.	.	.	2
Total Bases	**67**	**50**	**38**	**36**	**68**	**47**	**34**	**340**
Total Complaints	37	43	35	30	53	35	23	256

Table V.18, below, shows data regarding the issues associated with the complaints filed with the DHR. In this data set, differential treatment was listed on 113 occasions, eviction was noted 89 times, harassment was cited 69 times, and refusal to reasonably accommodate was shown 57 times.

Table V.18
Fair Housing Complaints by Issue
State of Minnesota
Department of Human Rights Data

Issue	2004	2005	2006	2007	2008	2009	2010	Total
Differential Treatment	14	25	9	13	23	14	15	113
Eviction	15	22	7	3	15	17	10	89
Harassment	13	6	9	10	12	11	8	69
Reasonably Accommodate, Refusal to	11	7	5	8	12	10	4	57
Refusal to Rent	8	1	6	8	8	8	.	39
Unequal Terms and Conditions	9	2	1	4	8	1	2	27
Sexual Harassment	3	1	10	2	6	1	1	24
Racial Harassment	7	.	1	4	1	5	2	20
Denial of Access	1	1	1	.	5	.	2	10
Opposing Forbidden Practices	.	.	.	1	4	3	2	10
Other	1	.	1	.	5	.	3	10
Qualifications for Tenancy	.	1	.	1	2	3	.	7
Refusal to Lease	.	2	.	.	1	2	.	5
Refusal to Sale	.	4	.	.	.	.	1	5
Association	1	.	.	.	.	2	.	3
References, Improper	.	.	.	.	.	2	.	2
Prohibition of Service Animal	.	.	.	1	.	.	1	2
Total Issues	**83**	**72**	**50**	**55**	**102**	**79**	**51**	**492**
Total Complaints	37	43	35	30	53	35	23	256

The closure status of the DHR complaints is displayed on the following page in Table V.19. The most frequent resolution associated with the complaints during this time period was a dismissal of the complaint, with the additional note that further resources were not warranted. This closure status was attributed to 89 of the 256 complaints. An additional 27 complaints were closed or dismissed when the complainant did not cooperate with the DHR investigation process, no probable cause was found in 27 complaints, and no probable cause was found with an appeal denied in an additional 18 complaints. Only 16 of the complaints were listed as successfully conciliated, and 13 were withdrawn after the situation was satisfactorily adjusted. Interestingly, one complaint included a finding of probable cause, while additional resources were, for some reason, not warranted.

Table V.19
Fair Housing Complaints by Closure
State of Minnesota
Department of Human Rights Data

Closure	2004	2005	2006	2007	2008	2009	2010	Total
Dismissal - Additional Resources Not Warranted	7	17	10	5	16	19	15	89
Dismissal - Complainant Did Not Cooperate with DHR Investigation	5	5	2	3	11	1	.	27
No Probable Cause Found	2	5	7	4	6	2	1	27
No Probable Cause Found and Appeal Denied	.	3	1	3	7	3	1	18
Conciliation Settlement	9	.	2	.	4	1	.	16
Withdrawn - Satisfactorily Adjusted	4	.	.	1	2	3	3	13
Alternative Dispute Resolution Settlement	1	.	2	3	3	2	1	12
Request to Reopen Denied	.	5	.	.	3	3	1	12
Case Dismissed by DHR	2	5	.	2	.	1	1	11
Withdrawn During Conciliation/Complainant - Has Requested a Right to Sue	.	.	1	7	.	.	.	8
Withdrawn - Reason Unknown	3	.	3	1	1	.	.	8
Withdrawn and Complainant - Has Requested a Right to Sue	4	.	.	1	.	.	.	5
No Probable Cause Found and Appeal Not Timely	.	2	1	.	.	.	.	3
No Probable Cause	.	.	1	.	.	.	.	1
Administrative Law Judge Determination - Case Closed	.	.	1	.	.	.	.	1
Although Probable Cause was Found, AG's Office Determined That It Did Not Warrant Additional Resources to Pursue	.	.	1	.	.	.	.	1
Lack of Jurisdiction	.	1	.	.	.	.	.	1
Settlement During Litigation	.	.	1	.	.	.	.	1
Withdrawn During Conciliation	.	.	1	.	.	.	.	1
Withdrawn During Conciliation or Litigation - Satisfactorily Adjusted	.	.	1	.	.	.	.	1
Total	**37**	**43**	**35**	**30**	**53**	**35**	**23**	**256**

Table V.20, below, presents data regarding the complaints that were successfully resolved or conciliated. The same top four bases were found, as in the larger data set, but in this case, complaints were linked to national origin more often than the basis of sex.

Table V.20
Successful Fair Housing Complaints by Basis
State of Minnesota
Minnesota Department of Human Rights Data

Basis	2004	2005	2006	2007	2008	2009	2010	Total
Race	7	.	.	6	.	1	.	14
Disability	3	.	.	5	2	.	.	10
National Origin	8	.	.	2	.	.	.	10
Sex	6	.	.	.	1	.	.	7
Public Assistance Status	1	.	2	.	.	.	.	3
Marital Status	.	.	.	.	2	.	.	2
Sexual Orientation	2	.	.	.	.	.	.	2
Familial Status	1	.	.	.	.	.	.	1
Religion	1	.	.	.	.	.	.	1
Total Bases	**29**	**.**	**2**	**13**	**5**	**1**	**.**	**50**
Total Complaints	14	.	3	11	5	1	.	34

The issues associated with the successfully resolved complaints are presented below in Table V.21. In this set of complaints, refusal to rent occurred most often, cited 14 times, followed by harassment, eviction, and unequal terms and conditions.

Table V.21
Successful Fair Housing Complaints by Issue
State of Minnesota
Department of Human Rights Data

Issue	2004	2005	2006	2007	2008	2009	2010	Total
Refusal to Rent	2	.	3	6	2	1	.	14
Harassment	9	.	.	.	2	1	.	12
Eviction	9	.	.	1	.	.	.	10
Unequal Terms and Conditions	8	.	.	1	1	.	.	10
Differential Treatment	2	.	.	5	2	.	.	9
Racial Harassment	6	.	.	3	.	.	.	9
Refusal to Reasonably Accommodate	3	.	.	3	.	.	.	6
Qualifications for Tenancy	.	.	.	.	2	1	.	3
Other	.	.	.	.	1	.	.	1
Sexual Harassment	.	.	.	.	1	.	.	1
Total Issues	**39**	**.**	**3**	**19**	**11**	**3**	**.**	**75**
Total Complaints	14	.	3	11	5	1	.	34

COMPLAINTS FILED WITH LEGAL AID OFFICES

Legal aid offices serving low-income clients in central and southern Minnesota handled more than 3,000 housing discrimination issues from 2004 through the third quarter of 2011.[84] While these offices serve less than half of the counties in the state, the legal aid complaint data available have been included in this analysis to provide more information about housing discrimination in Minnesota. Data are available from two legal aid agencies under the Housing Discrimination Law Project, a service of the Legal Aid Society of Minneapolis.

> "The Housing Discrimination Law Project (HDLP) advances equal housing rights for Legal Aid clients by handling their cases, advocating for just policies and inspiring new advocates. HDLP serves individual clients with low incomes by investigating claims, negotiating, giving advice and referrals, and representing clients in court and administrative actions. HDLP also addresses discrimination at the systemic level by providing other organizations and individuals with training, legal analysis, technical assistance and advocacy; challenging systemic and institutional sources of housing discrimination; and representing clients' interests in public policy debates and the development of equal housing policies."[85]

[84] December 30, 2011 letter from James Wilkinson, Legal Aid Society of Minneapolis
[85] Legal Aid Society of Minneapolis, http://www.mylegalaid.org/poverty-law/legal-aid-society-of-minneapolis/hdlp

Data on discrimination complaints submitted to Mid-Minnesota Legal Assistance (MMLA) and Southern Minnesota Regional Legal Services (SMRLS) between January 2010 and September 2011 are presented by basis in Table V.22, on the following page. There were 875 complaints filed during this period, corresponding to 945 bases. As with the HUD data presented previously, disability was the most commonly cited basis for complaint, with 580 bases. Race and sex were also very common, with 138 and 123 bases, respectively.

Table V.22
Basis of Discrimination Complaints
Central and Southern Minnesota
MMLA and SMRLS Data, 1/2010 - 9/2011

Basis of Claimed Discrimination	Number of Bases
Race	
White	10
Black	120
Asian	2
Native Hawaiian	.
American Indian or Alaskan Native	3
Other	3
Total Race	**138**
Religion	
Christian	1
Jewish	.
Muslim	2
Other	1
Total Religion	**4**
National Origin	
Hispanic or Latino	38
Other	22
Total National Origin	**60**
Sex	
Total Sex	**123**
Disability	
Total Disability	**580**
Familial Status	
Total Familial Status	**40**
Other	
Other (Public assistance status, marital status, etc.)	**40**
Total Bases	**985**
Total Complaints	875

The outcomes of the legal aid complaints are displayed on the following page in Table V.23. During this period, 878 cases were closed but only 875 were opened, suggesting that three were opened prior to January 2010. Further, some cases were closed with multiple outcomes, creating 887 outcomes. The majority of complaints, 451, were closed, either with advice or referral provided, no merit found, or insufficient resources available to fully serve the complainant. An additional 222 complaints resulted in a housing unit obtained for the complainant, and in 125 cases, reasonable accommodation or modifications were made to address the issue. In 39 cases, a monetary sum was awarded to the complainant.

Table V.23
Outcome of Complaints
Central and Southern Minnesota
MMLA and SMRLS Data, 1/2010 - 9/2011

Outcome	Number
Closed with: Advice/referral, finding of no merit, insufficient resources to fully serve, etc.	451
Housing Unit Obtained	222
Reasonable Accommodation or Modifications	125
Monetary Award or other Financial Benefit	39
Fair Housing Training	3
Other - Changes in policies, staff changes, etc.	47
Total Outcomes	**887**
Total Cases Closed	878

DISCRIMINATION IN RENTAL ADVERTISING

Housing discrimination in the rental markets can also be examined through the prevalence of discriminatory advertising for rental properties. As established previously, according to federal law, it is illegal to prohibit sale, lease, rental, assignment, or sublease based on familial status, sex, national origin, color, religion, disability, or race. State law includes the federally protected classes as well as creed, sexual or affectional orientation, marital status, and receipt of public assistance, while Duluth includes age, Minneapolis includes ancestry, and St. Paul includes ancestry and age. Consequently, it is also illegal to directly or indirectly advertise that the sale, lease, rental, assignment, or sublease of housing is unwelcome or objectionable for any of the aforementioned protected classes. Laws do generally have an exception regarding sex in that an individual may advertise that he or she prefers a male or female renter if he or she resides in the dwelling or the dwelling permits no more than two families living independently. It is also legal to advertise that potential tenants must be above a certain age if the housing is specifically designated for seniors.

ANALYSIS OF CRAIGSLIST ADVERTISEMENTS

In order to examine the prevalence of discrimination in advertising for rental housing, a sample of advertisements was gathered from the Craigslist website, which allows rental management companies and individuals to post advertisements for rental units. Two types of rental advertisements are posted: apartments or houses and rooms or shared living quarters.

A sample of more than 550 advertisements posted within several regions in Minnesota on the Craigslist website on September 15, 2011, was generated and inspected for preferential phrasing or possible discriminatory language. The majority of the advertisements related to available rental units, 400 of the 562 in the sample, and the remaining were for available rooms or shared living quarters.

As shown on the following page in Table V.24, 41 advertisements demonstrated preferential phrasing that might restrict housing choice. In the apartments/housing listings, one advertisement showed phrasing that indicated preference based on sex, while one showed preference based on age, and four on familial status. Of the advertisements listing rooms or shared living quarters, 20 showed a preference based on sex, 13 a preference based on age, and two included preferences based on familial status. Although a preference based on sex limits housing choice, it may represent an exception to the rule, as discussed previously.

Table V.24
Preferences Stated in Advertisements
State of Minnesota
Craigslist Data, September 15, 2011

Housing Type	Sex	Age	Familial Status
Apartments/Housing	1	1	4
Rooms/Shared	20	13	2
Total	**21**	**14**	**6**

Pets are mentioned often in housing advertisements. While it is legal for advertisements to note a pet policy, individuals with service animals may not be aware that housing advertised as "no pets" must allow service animals. If an individual with a service animal does not know his or her rights, it may hinder his or her ability to find housing. In total, 208 advertisements were posted indicating that "no pets" were allowed or that size restrictions existed. These data are presented below in Table V.25.

Table V.25
Advertised Pet Policies
State of Minnesota
Craigslist Data, September 15, 2011

Housing Type	Pet or Size Restrictions
Apartments/Housing	157
Rooms/Shared	51
Total	**208**

While less than 2 percent of advertisements demonstrated preferential phrasing in the apartments/housing listings, 20 percent of listings in the rooms/shared living quarters showed preference. Because most of the listings for apartments and homes were posted by large leasing companies that list multifamily units, these findings suggest that larger leasing establishments are aware of fair housing laws and do not advertise in a discriminatory manner. However, some questionable phrasing was found in the rooms or shared living quarters listings, and these advertisements appeared to be posted by individuals or small property management companies rather than large management companies. Housing providers with only a few units or persons offering just a room for rent may benefit from additional education on fair housing laws.

FAIR HOUSING SURVEY – PRIVATE SECTOR RESULTS

Additional evaluation of fair housing within Minnesota was conducted via a survey of stakeholders. 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. Results and comments related to these questions in the private sector are in the following narrative, and additional survey results are discussed in Sections VI and VII.

A total of 562 persons in Minnesota completed the fair housing survey, which was conducted mostly online. Individuals solicited for participation included representatives of housing groups, minority organizations, disability resource groups, real estate and property management associations, banking entities, and other groups involved in the fair housing arena. Most questions in the survey required simple "yes," "no," or "don't know" responses, although many questions allowed the respondent to offer written comments. While the numerical tallies of results are presented in this section, along with summaries of some comment-driven questions, a complete list of written responses is available in Appendix E.

FAIR HOUSING IN THE PRIVATE SECTOR

In order to address perceptions of fair housing in Minnesota's private housing sector, survey respondents were asked to identify their awareness of possible housing discrimination issues in a number of areas within the private housing sector, including the:

- Rental housing market,
- Real estate industry,
- Mortgage and home lending industry,
- Housing construction or accessible housing design fields,
- Home insurance industry,
- Home appraisal industry, and
- Any other housing services.

If respondents indicated affirmatively that they were aware of possible discriminatory issues in any of these areas, they were asked to further describe issues in a narrative fashion. Tallies for each question are presented below in Table V.26.

Table V.26
Fair Housing in the Private Sector
State of Minnesota
Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
The rental housing market?	88	183	80	211	562
The real estate industry?	28	177	146	211	562
The mortgage and home lending industry?	37	165	150	210	562
The housing construction or accessible housing design fields?	24	190	134	214	562
The home insurance industry?	14	167	165	216	562

The home appraisal industry?	23	160	164	215	562
Any other housing services?	20	168	148	226	562

Rental Housing

Regarding barriers to fair housing choice in the rental housing market, a total of 88 respondents noted that they were aware of fair housing issues in this area. Therefore, of those who answered the question, 25.1 percent showed awareness of possible discrimination in the rental market.

As indicated previously, respondents were also asked to discuss these questionable practices or barriers specifically in narrative format. While several comments related to a lack of affordable housing this item is more closely related to housing production and does not fit the definition of an impediment to fair housing choice. Relevant comments were synthesized and a number of issues were discovered, as presented below:

- Denial of availability of vacant units based on race, national origin, sex, and familial status;
- Refusal to rent based on national origin, familial status, disability, religion, color, and race, particularly for immigrants and American Indian and black applicants;
- Discriminatory terms and conditions or advertising;
- Refusal to make reasonable accommodations for persons with mental and physical disabilities; and
- A general lack of interest in or understanding of fair housing by housing providers.

Real Estate Industry

Twenty-eight respondents noted awareness of barriers to fair housing choice in the real estate industry, which represents 8 percent of respondents who answered this question. Of those who indicated awareness of questionable practices or barriers to fair housing choice in the real estate market, several offered more detailed explanations of these issues. Again, many comments related to housing production issues, such as lack of affordable housing, but this issue does not necessarily qualify as impediments to fair housing based on HUD's definition. More pertinent comments referenced discriminatory practices such as steering or guiding potential buyers to certain areas because of perceived or assumed preferences based on race, color, and familial status. These concepts confirm what the HMDA data and a 2009 study by the Institute on Race and Poverty found, adding additional weight to the finding that discrimination in the private sector adversely affects minorities with high rates of denial, foreclosure, and predatory lending.[86]

[86] "Communities in Crisis: Race and Mortgage Lending in the Twin Cities," Institute on Race and Poverty, February 2009

Mortgage and Home Lending Industry

Regarding barriers to fair housing choice in the lending or mortgage industries, a total of 37 respondents noted that they were aware of fair housing issues in this area. Thus, almost 11 percent of persons who answered this question showed awareness of possible discrimination in the lending or mortgage markets. Comments primarily related to issues based on race, sex, and national origin and are presented below.

- Redlining, often in association with tribal lands;
- Predatory lending, particularly in relation to race; and
- Denial of loans, especially for woman, single applicants, and racial minorities.

Housing Construction or Accessible Housing Design Fields

Barriers to fair housing choice in the housing construction or accessible housing design fields were also addressed in the survey. A total of 24 respondents were aware of fair housing issues in these fields, which equated to 6.9 percent of persons who answered this question. Persons who were aware of issues in the housing construction or accessible housing design fields were also asked to provide specific examples of these issues. These items, as gathered from the comments, are presented below.

- Failure to make units compliant with local codes related to standards for persons with disabilities, especially among small builders; and
- Units are not designed in line with the international building codes that require accessibility for disabled persons, particularly in new construction and in older units.

Home Insurance Industry

A total of 14 respondents, or 4 percent of all those who answered this question, noted barriers to fair housing choice in the home insurance industry; these comments related issues of companies offering unfair rates based on race and national origin as well as charging more for or canceling services in inner-city and higher crime areas.

Home Appraisal Industry

The home appraisal industry was also investigated as part of the survey. Twenty-three respondents noted that they were aware of barriers to fair housing choice in the home appraisal industry, which represented nearly 7 percent of all respondents who answered this question. The comments related to redlining based on race and national origin, particularly in low-income areas.

Any Other Housing Services

Respondents were also asked to discuss their awareness of barriers to fair housing in any other area of the private housing sector. Twenty respondents noted awareness of other issues and included further concern about the lack of protection for classes not covered by fair housing law, although other comments noted discrimination based on race, ethnicity, and familial status in both supportive housing and community associations.

SUMMARY

Evaluation of the private housing sector included review of home purchase lending information and predatory lending practices, fair housing complaint data, online rental advertisements, and results from the private sector part of the fair housing survey, and the size, frequency, and location of business loans.

Home Mortgage Disclosure Act (HMDA) data were used to analyze differences in denial rates in the State of Minnesota by race, ethnicity, sex, income, and census tract. Evaluated home purchase loan applications from 2004 through 2009 showed that there were 468,180 loan originations and more than 83,354 loan denials, for an average six-year loan denial rate of 15.1 percent. Denial rates fell from 17.6 percent in 2006 to 11.6 percent in 2009. These HMDA data also showed that black, American Indian, and Hispanic applicants experienced significantly higher rates of loan denials than white or Asian applicants, even after correcting for income. Further, these highly denied racial and ethnic groups appear to have been disproportionately impacted in some geographic areas of the state wherein denial rates exceeded 75 percent.

Analysis of high annual interest rate lending showed that black, American Indian, Asian, and Hispanic populations were also disproportionately impacted by an unusually higher share of lower-quality loan products. Hispanic and American Indian applicants experienced a rate double than that of white applicants, while black applicants experienced a rate more than three times that of white applicants. With such high proportions of these minorities receiving lower-quality, high-interest rate loans, the burden of foreclosure likely tended to fall more heavily upon these particular groups.

Analysis of data from the Community Reinvestment Act (CRA), which was developed to encourage investment in communities of low- and moderate-income areas, showed that business loans were likely not sufficiently originated in areas with higher levels of poverty in the State of Minnesota.

Fair housing complaint data was requested from HUD and the Minnesota Department of Human Rights (DHR). Data from these sources showed that 682 complaints were filed in the state from January 2004 through June 2011. The number of complaints filed with these agencies varied by year and ranged from 76 to 106, with 2011 excluded as a partial year.

Housing complaint data was also received from the Legal Aid Society of Minneapolis. The protected classes disproportionately impacted by discrimination in rental markets based on successfully conciliated complaints were disability, race, familial status, and national origin. The most common issues regarding these complaints were:

- Failure to make reasonable accommodation;
- Discriminatory terms, conditions, or privileges relating to rental;
- Discriminatory refusal to rent; and
- Discriminatory terms, conditions, privileges, or services and facilities.

A review of a sample of more than 550 Craigslist postings throughout the state from September 2011 revealed few instances of poor language choices in advertisements for housing in the rental market, with some preferential statements made based on sex, age, and familial status.

Results from the private sector portion of a fair housing survey, which was conducted as part of the AI process, showed that many respondents saw possible issues of housing discrimination in Minnesota's private housing sector. Issues described by respondents regarding the rental markets related to denial of available units, refusal to rent, discriminatory terms and conditions, and failure to make reasonable accommodation or modification. In the home purchase and lending industries, comments related to steering, redlining, denial of loans, and predatory lending. Additional concerns voiced about the private housing sector in Minnesota included failure to comply with disability codes in housing construction and location- and race-based discrimination in the home insurance and home appraisal industries.

SECTION VI. FAIR HOUSING IN THE PUBLIC SECTOR

While the previous section presented a review of the status of fair housing in the private sector, this section will focus specifically on fair housing in the public sector. HUD recommends that the AI investigate a number of areas within the public housing sector, including health and safety codes, construction standards, zoning and land use policies, tax policies, and development standards. The AI should also examine the placement of public housing as well as access to government services.

LOCATION OF PUBLIC SERVICES

ASSISTED HOUSING

Public or assisted housing can exist in several forms, including low-income housing projects, housing voucher programs, and supportive housing. The objective of public and other forms of assisted housing is to provide housing that is suitable for persons with special needs or families of low- to moderate-income levels and to promote access to jobs, transportation, and services.

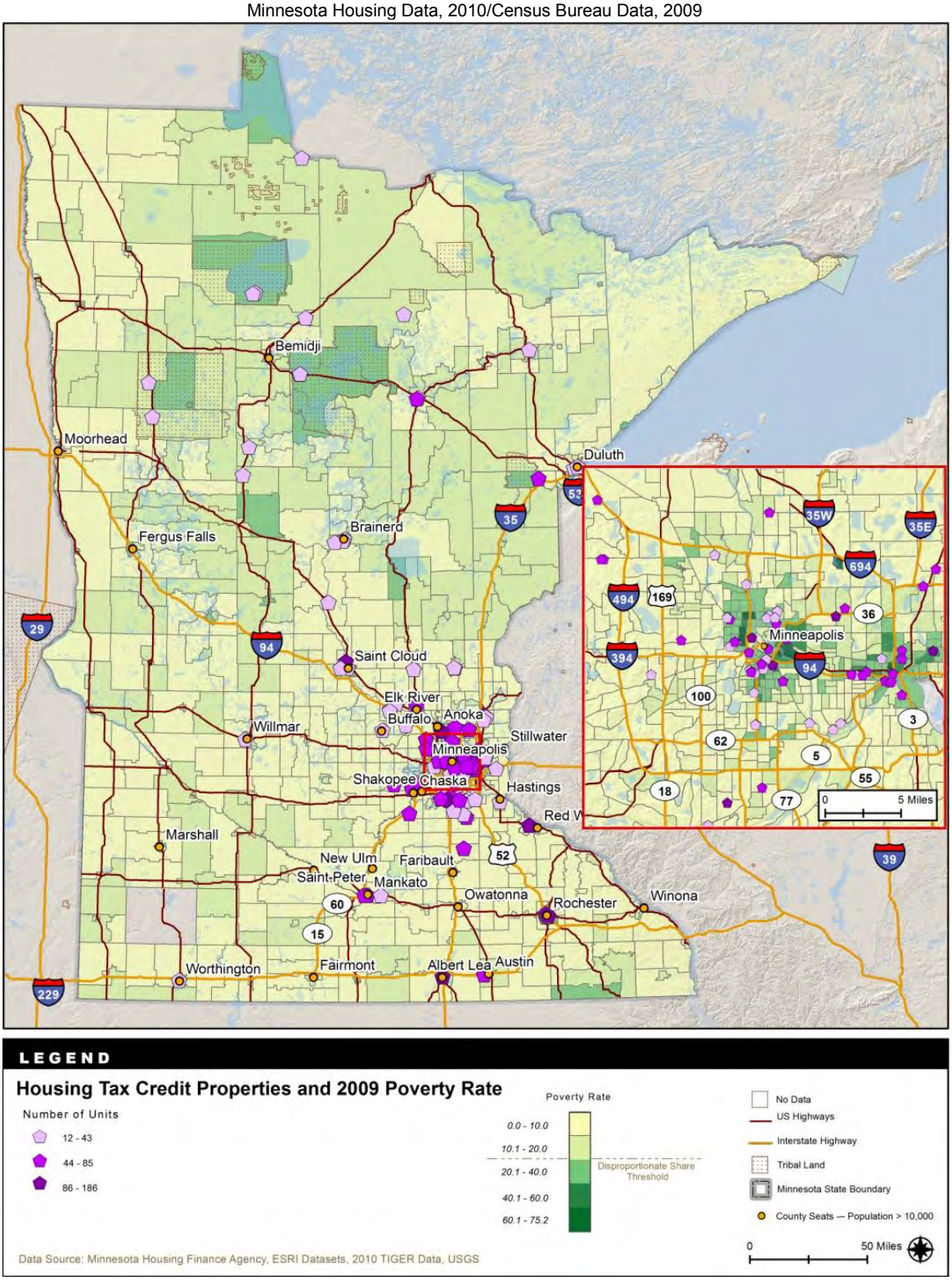
The Low Income Housing Tax Credit (LIHTC) program serves as a means to provide housing options that focus on affordability. The LIHTC exists as an indirect federal subsidy used to support the development of rental housing that is affordable for low-income households. Map VI.1, on the following page, presents the location of LIHTC properties and the concentration of poverty and shows that the majority of LIHTC units were concentrated in the Twin Cities metro region. Many units, though not all, were located in areas with higher levels of poverty, and there were fewer housing tax credit properties located in rural areas of the state; many of these properties had fewer than 43 units.

The project-based Section 8 program provides rental assistance for tenants in Section 8 developments. Persons apply to become Section 8 tenants, with restrictions based on income and other factors. Map VI.2, on page 123, presents the location of Section 8 properties compared to the concentration of poverty in the state. As shown, the Section 8 units were scattered throughout the state, although they were somewhat concentrated in higher poverty tracts in the Minneapolis area. Many of the Section 8 units in rural areas had fewer than 50 units, while the more urban ones tended to be larger, with some having up to several hundred units. Map VI.3, on page 124, shows the expiration year for existing Section 8 projects, with a significant number of projects at risk of expiration by 2015 in the areas with higher poverty.

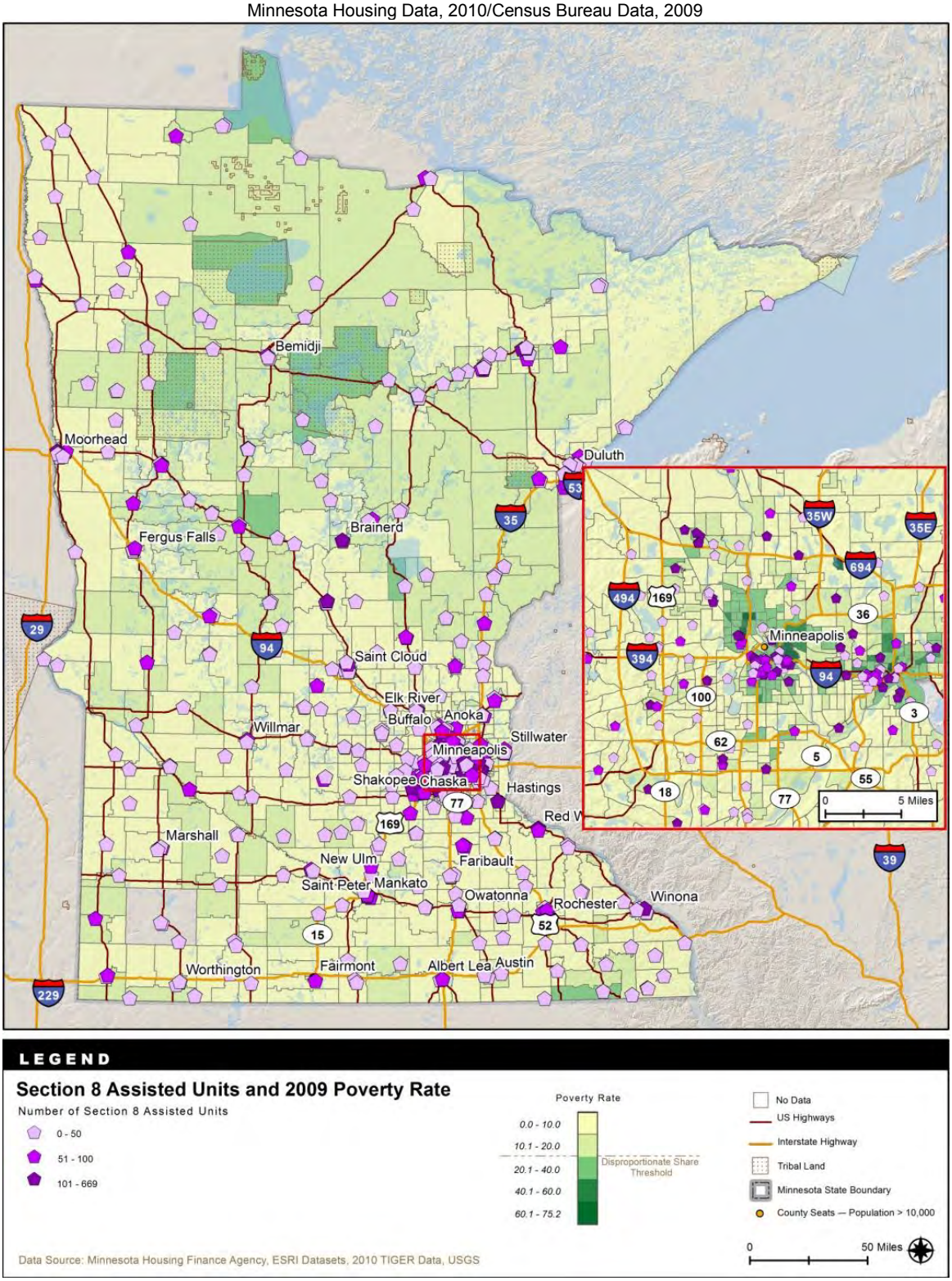
Map VI.4, on page 125, presents the location of supportive housing units in the state, which include permanent and transitional housing for youth, families, victims of domestic violence, and housing for persons with limitations due to HIV/AIDS, reentry, homelessness, or

substance abuse. As shown, supportive housing in the state was predominantly located in the Twin Cities metro region and therefore near to ancillary supportive services, but also often in areas with higher poverty levels. There were far fewer supportive housing facilities in the rest of the state, with only a small number in Duluth, Rochester, Saint Cloud, Mankato, and other larger cities; a large geographic area of the state was not well served with housing for these populations.

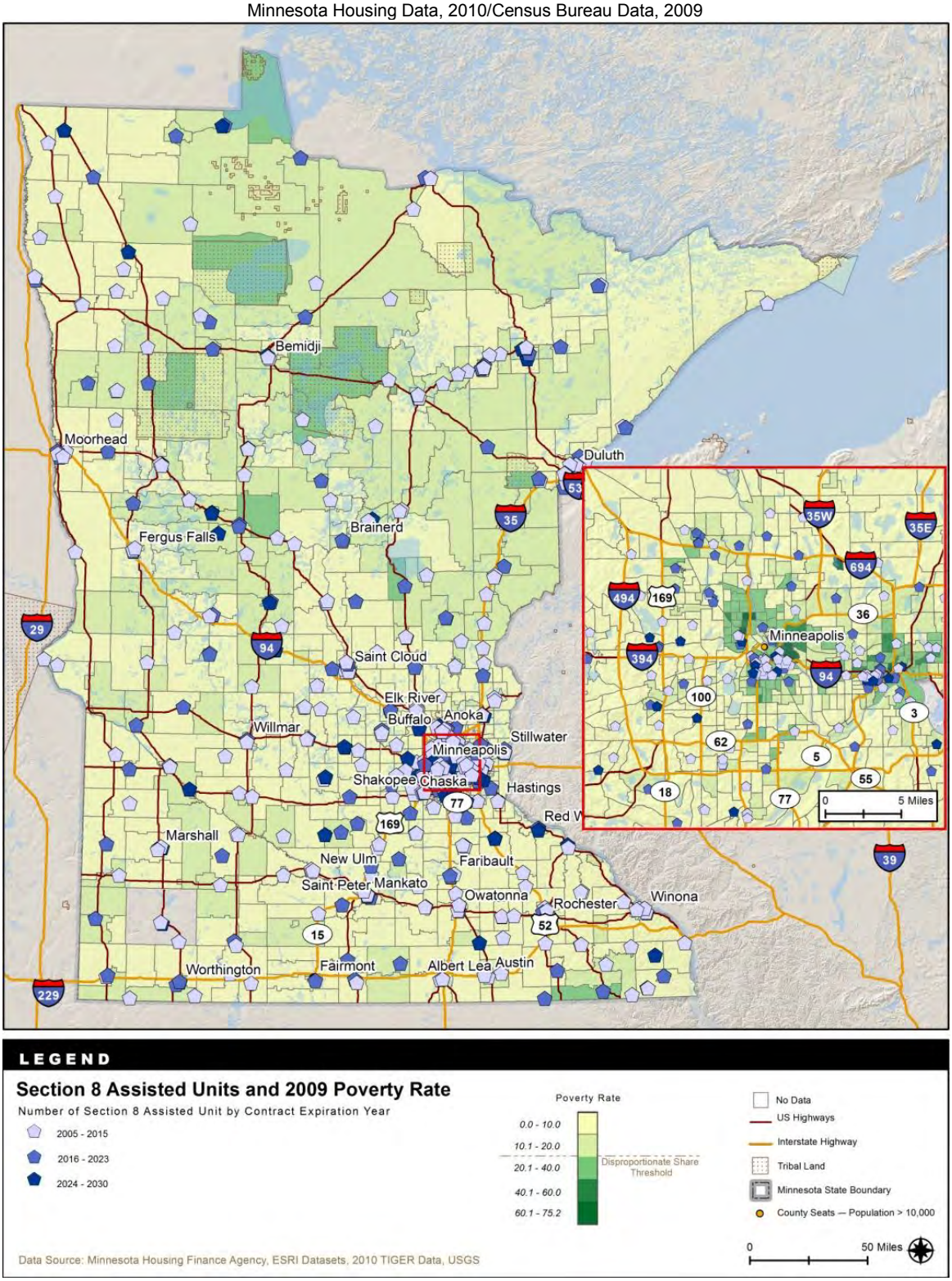
Map VI.1
Tax Credit Properties
State of Minnesota
Minnesota Housing Data, 2010/Census Bureau Data, 2009



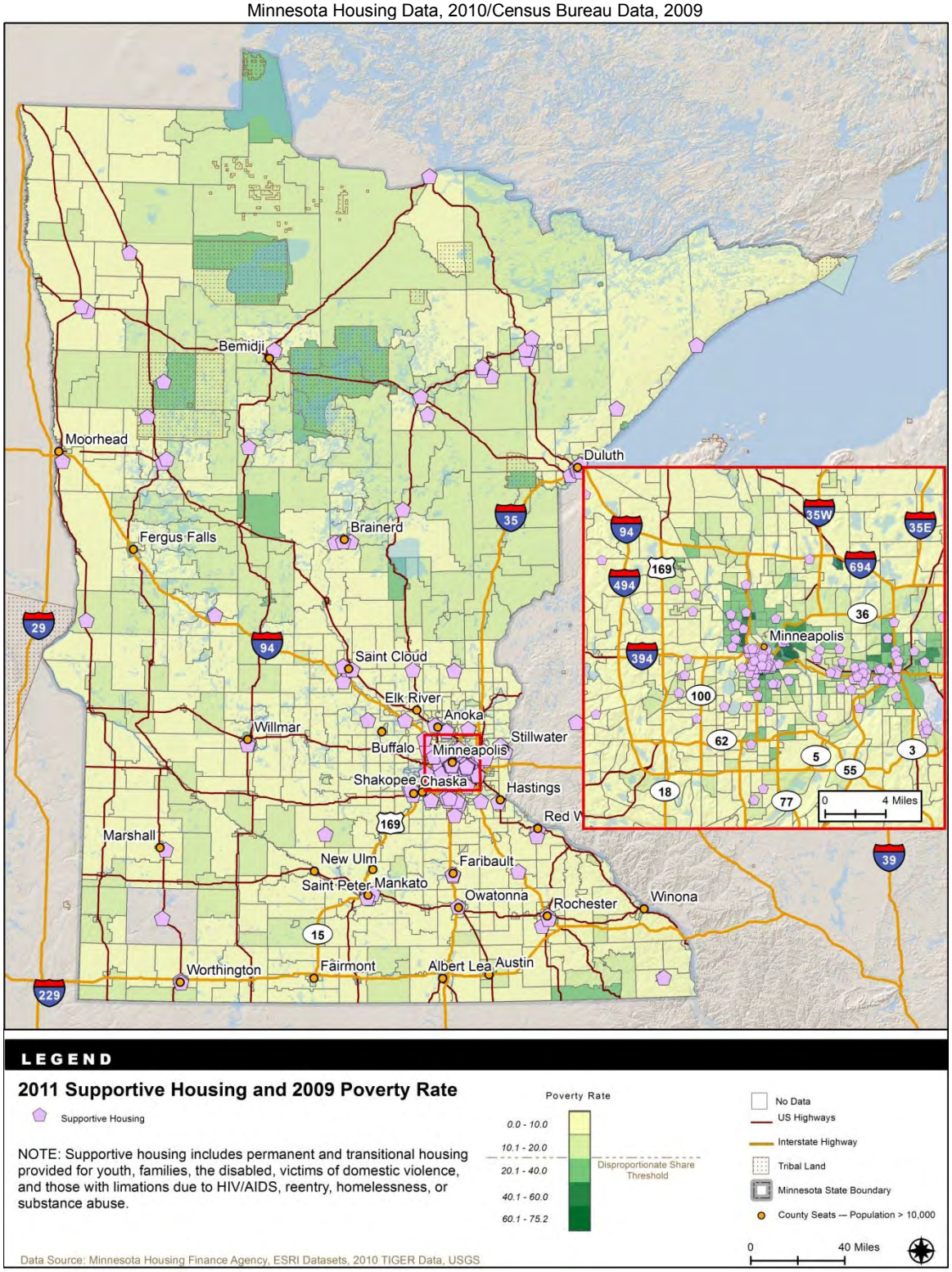
Map VI.2
Existing Section 8 Properties
State of Minnesota
Minnesota Housing Data, 2010/Census Bureau Data, 2009



Map VI.3
Expiring Section 8 Properties
State of Minnesota
Minnesota Housing Data, 2010/Census Bureau Data, 2009



Map VI.4
Supportive Housing Locations
State of Minnesota
Minnesota Housing Data, 2010/Census Bureau Data, 2009



TRANSIT AND EMPLOYMENT LOCATIONS

The next set of maps examines the relationship among the locations of employment areas, job training centers, and transportation in the state.

Map VI.5, on the following page, presents the concentration of employment within the State of Minnesota and shows that many large employers were highly concentrated in the Twin Cities metro region, although many employment locations were also situated near highways. Employers with more than 100 employees were seen across the state, with a few in rural areas, and some large businesses employing several thousand employees in cities like Marshall, Minneapolis, and Rochester.

A comparison of poverty rates and job training locations is presented in Map VI.6, on page 128, which shows the locations of state-run WorkForce Centers in Minnesota. WorkForce Centers were distributed relatively evenly throughout the state, although there were fewer in tracts with high poverty rates, such as those in the northern part of the state and on reservations. Central Minneapolis was served with two WorkForce offices, while downtown St. Paul was not.

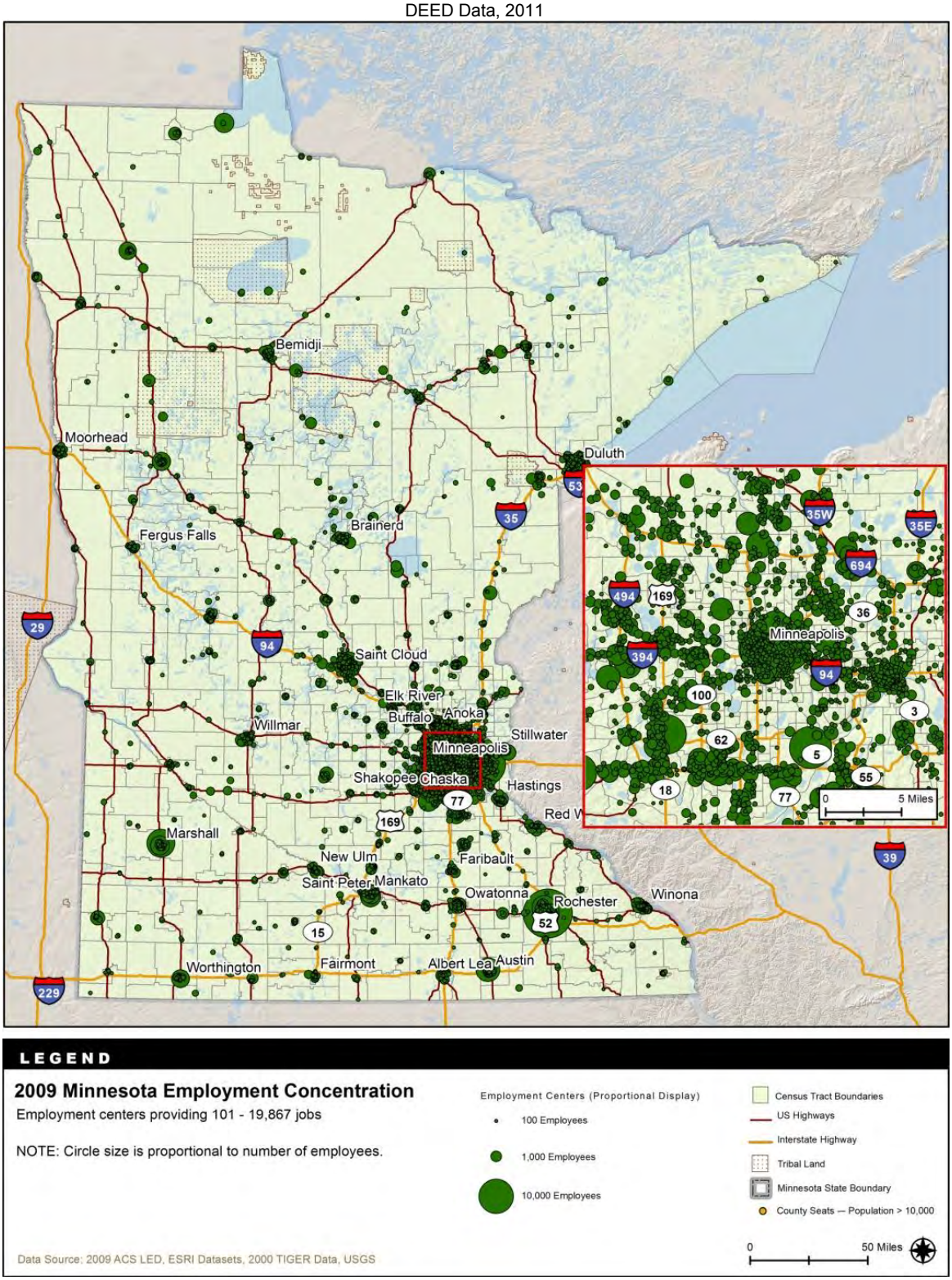
In addition to poverty and job search assistance, public transit availability can be used to understand the accessibility of job training programs for low-income residents. Map VI.7, on page 129, shows the locations of WorkForce Centers and public transit lines in the Minneapolis/St. Paul area, which was well-served with public transit and extended to the training facilities and the lowest-income areas.

The WorkForce Center and public transit lines in Duluth are shown on page 130 in Map VI.8. This area had a public transit system that covered the lowest-income areas and served the WorkForce office.

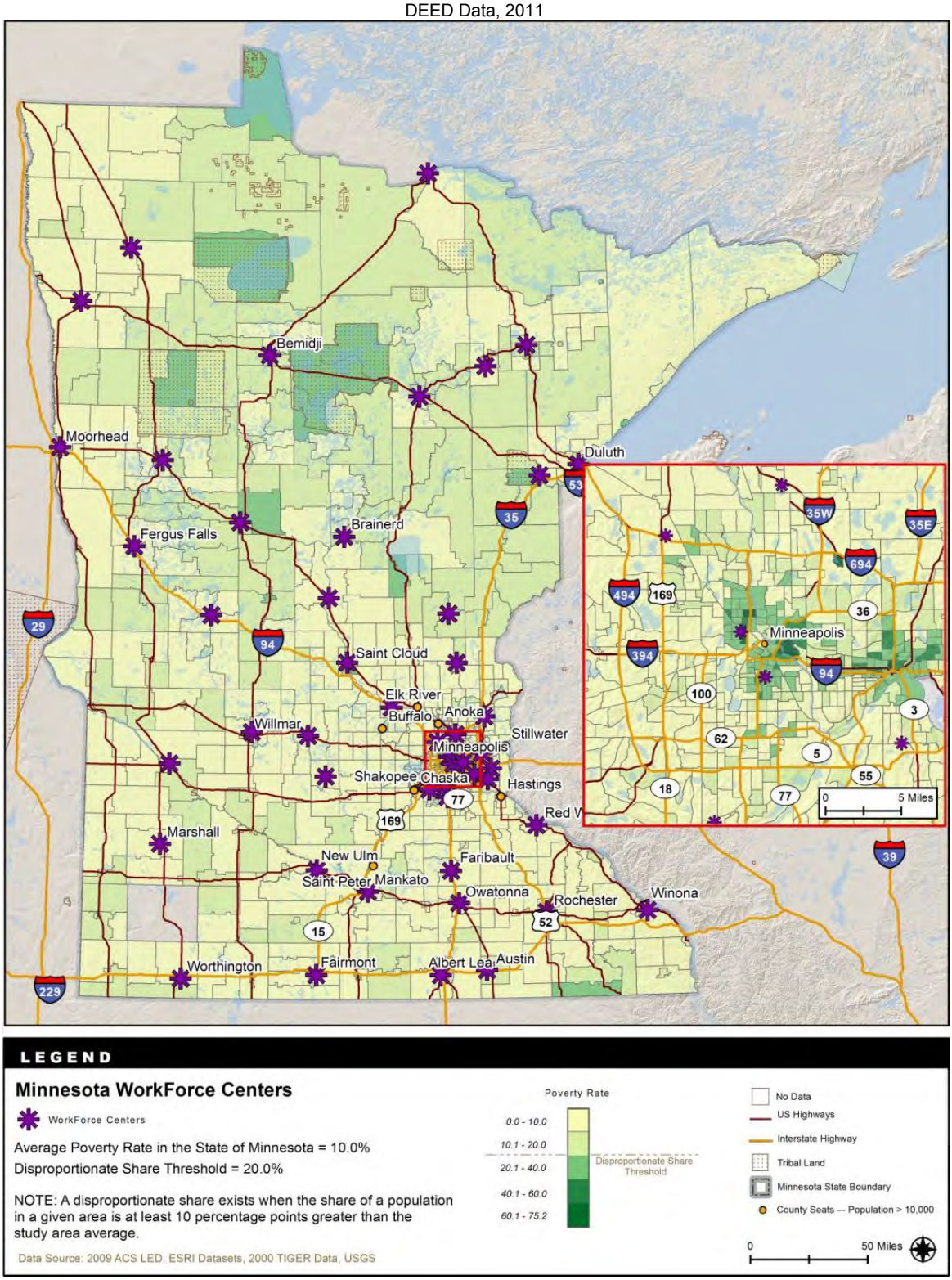
Map VI.9, on page 131, shows the locations of the WorkForce office and public transit lines in Rochester. The Rochester WorkForce Center was in one of the lowest-income tracts in Rochester and served by the city's public transit system. The Rochester office was the only office for a large area in the southern part of the state; however, job seekers who use it may come from more rural communities.

Map VI.10, on page 132, shows the locations of the WorkForce Center and public transit lines in Saint Cloud. The poorest areas were not near the WorkForce office, which was served by only one bus line. Saint Cloud was also served by the public transit system from the Minneapolis/St. Paul metro area, as shown previously in Map VI.7.

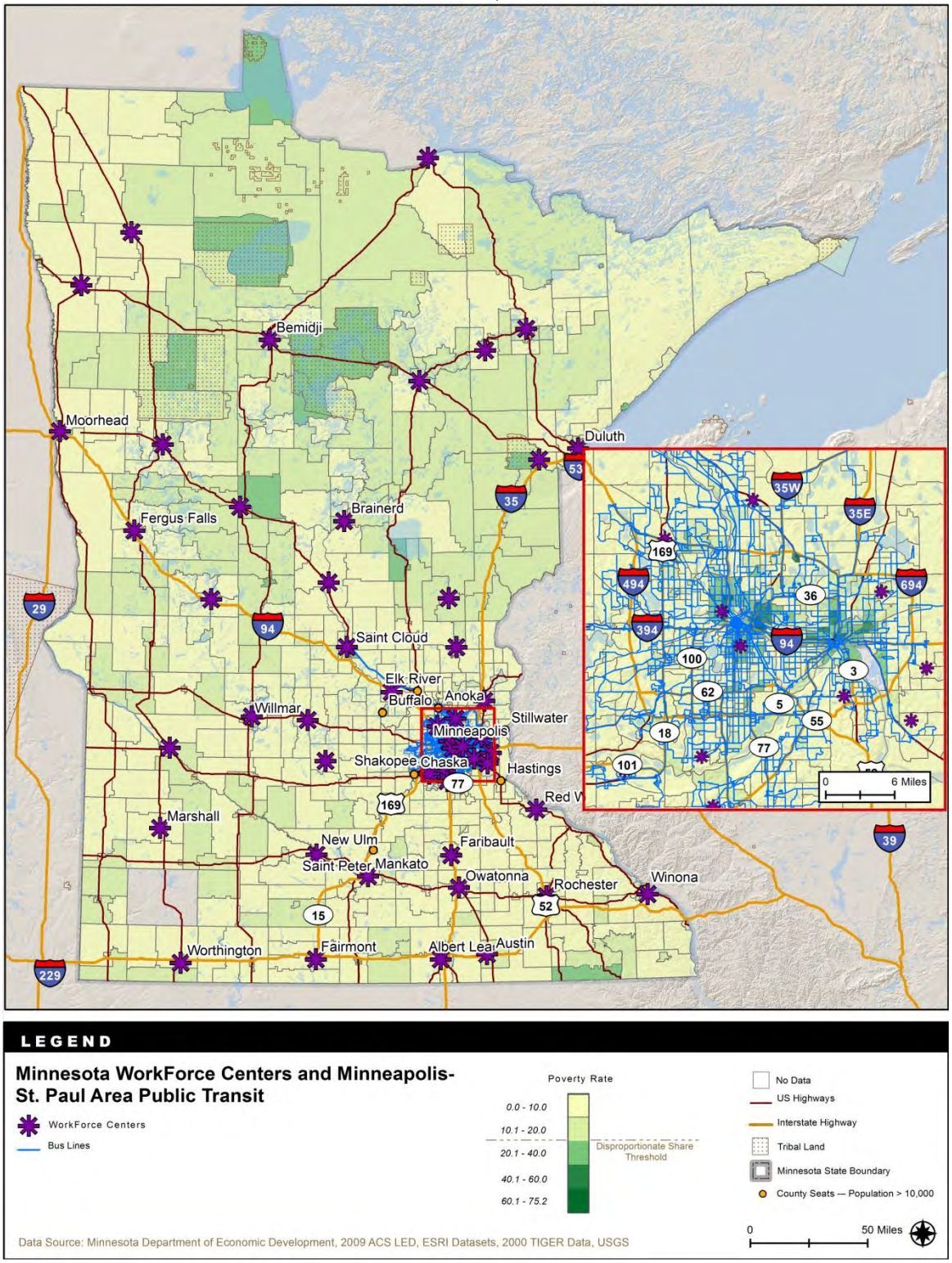
Map VI.5
Employment Concentration
State of Minnesota
DEED Data, 2011



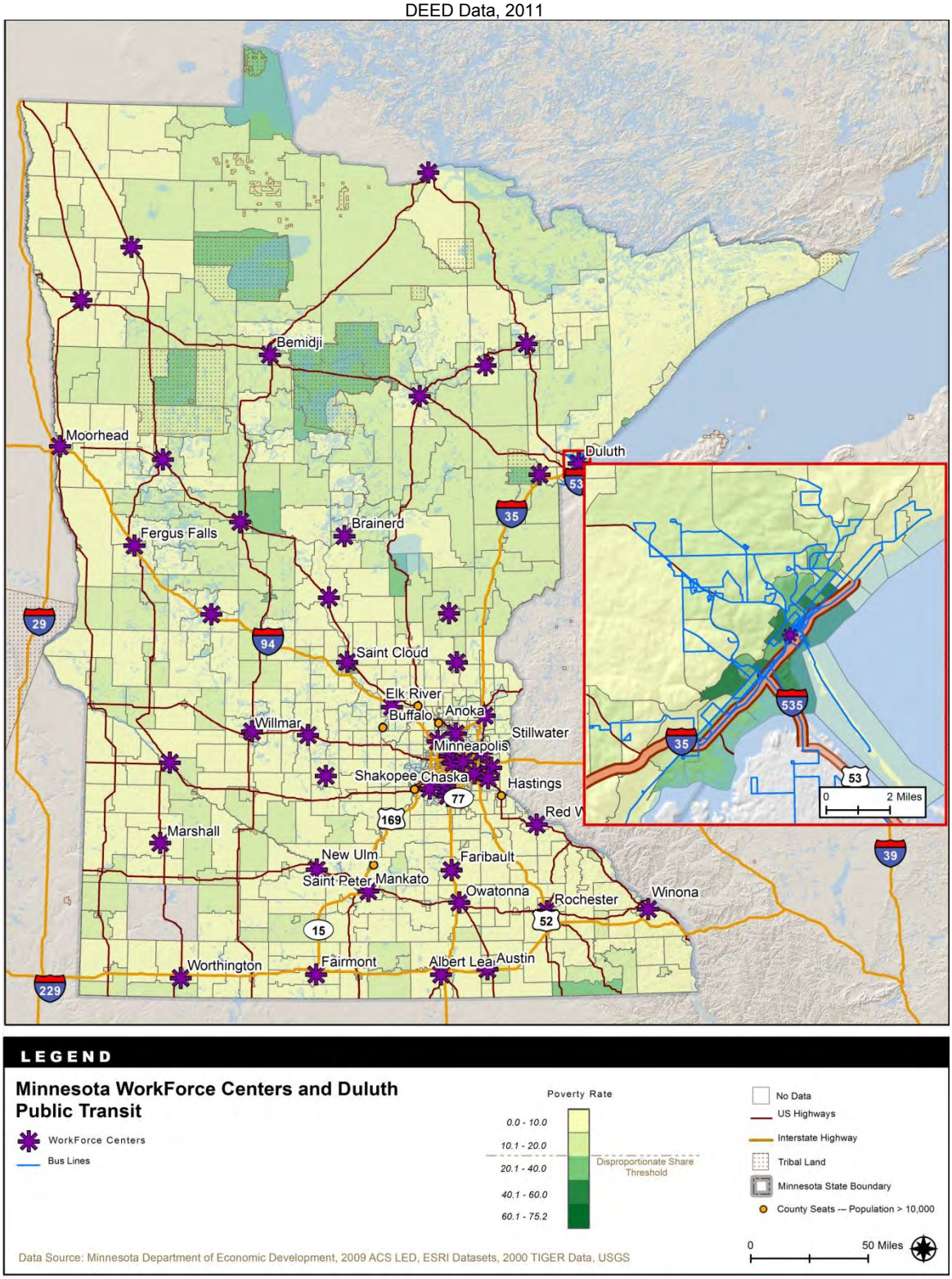
Map VI.6
WorkForce Centers
State of Minnesota
DEED Data, 2011



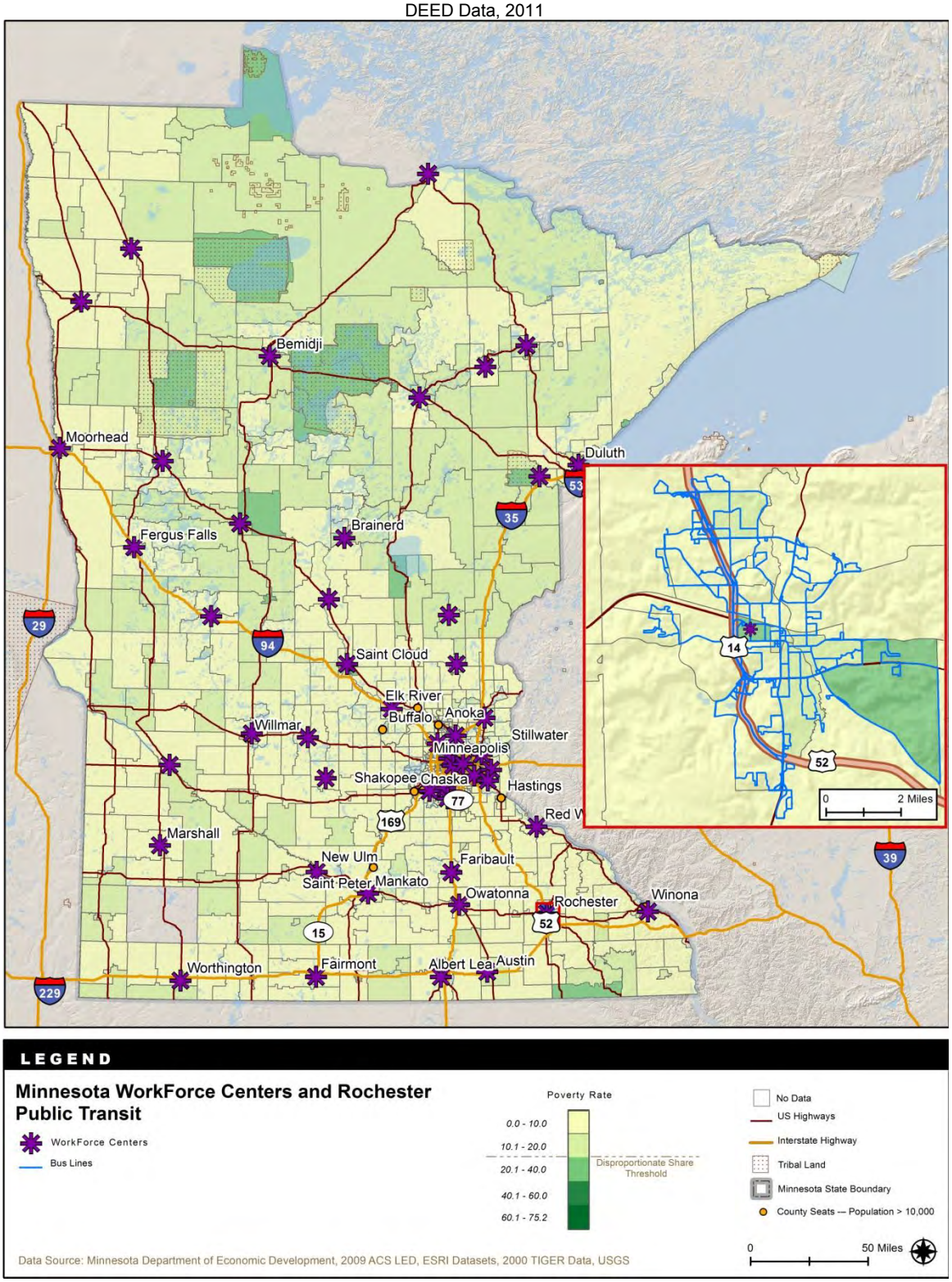
Map VI.7
WorkForce Centers and Minneapolis/St. Paul Public Transit
State of Minnesota, Minneapolis/St. Paul Metro Area
DEED Data, 2011



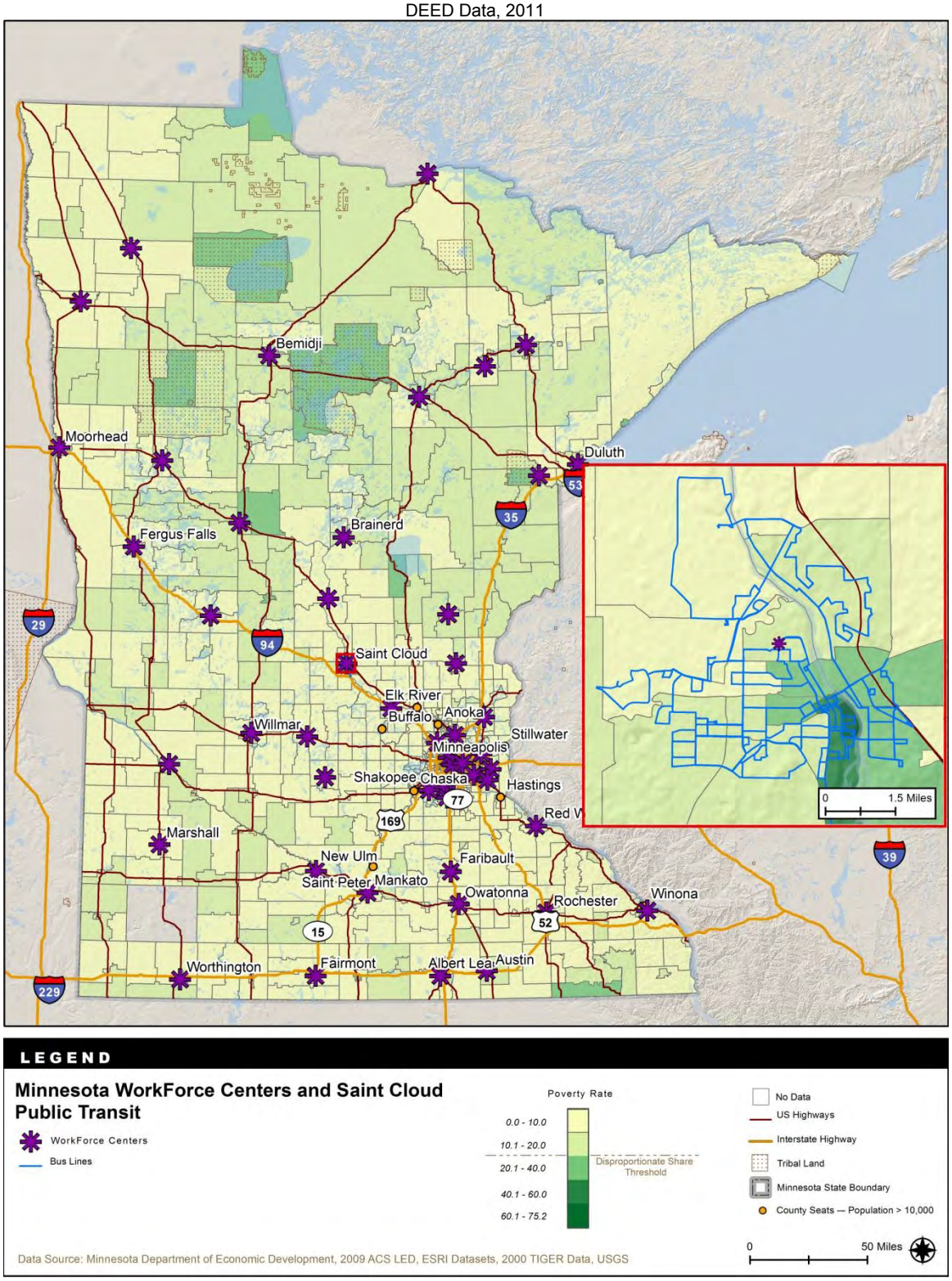
Map VI.8
WorkForce Centers and Duluth Public Transit
State of Minnesota, City of Duluth
DEED Data, 2011



Map VI.9
WorkForce Centers and Rochester Public Transit
State of Minnesota, City of Rochester
DEED Data, 2011



Map VI.10
WorkForce Centers and Saint Cloud Public Transit
State of Minnesota, City of Saint Cloud
DEED Data, 2011



FAIR HOUSING SURVEY – PUBLIC SECTOR RESULTS

Further evaluation of the status of fair housing within the State of Minnesota was conducted via an online fair housing survey, which was completed by 562 stakeholders and citizens. Individuals solicited for participation included representatives of housing groups, minority organizations, disability resource groups, real estate and property management associations, banking entities, fair housing advocates, members of the legal community, and other groups involved in the fair housing arena. Most questions in the survey required simple "yes," "no," or "don't know" responses, although many questions allowed respondents to offer written comments. While the numerical tallies of results are presented in this section, along with summaries of some comment-driven questions, a complete list of written responses is available in Appendix E. Other survey results are also discussed in Sections V and VII.

FAIR HOUSING IN THE PUBLIC SECTOR

The public housing sector can be fairly complex, so the questions in this section asked respondents to think about possible barriers to fair housing choice within very specific areas of the public housing sector. The list of areas presented for respondents was as follows:

- Land use policies,
- Zoning laws,
- Occupancy standards or health and safety codes,
- Property tax policies,
- Permitting processes,
- Housing construction standards,
- Neighborhood or community development policies,
- Public housing authorities,
- Access to government services,
- Barriers to minorities serving as representatives,
- Any other public administrative actions or regulations, and
- Jurisdictional definitions relating to fair housing.

If respondents indicated that they were aware of possible discriminatory issues in any of these areas, they were asked to further describe issues in a narrative fashion. Tallies for each question are presented in Table VI.1, on the following page.

It should be noted that, throughout this section of the survey, respondents noted issues that were outside the realm of fair housing issues, including issues that affect persons who are not protected by fair housing law such as persons with criminal histories, and issues regarding affordable housing production and availability.

Table VI.1
Fair Housing in the Public Sector
State of Minnesota
2011 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
Land use policies?	35	184	114	229	562
Zoning laws?	43	175	113	231	562
Occupancy standards or health and safety codes?	41	168	122	231	562
Property tax policies?	18	156	150	238	562
Permitting process?	22	167	143	230	562
Housing construction standards?	17	177	135	233	562
Neighborhood or community development policies?	34	161	132	235	562
Compliance issues with any public housing authority?	15	228	84	235	562
Limited access to government services such as employment services?	57	187	80	238	562
Limit access of minority populations to serving as representatives?	27	199	96	240	562
Public administrative actions or regulations?	23	140	166	233	562
Are you aware of your jurisdiction's definitions of "dwelling unit," "family," or "disability"?	100	135	95	232	562

Land Use Policies

Thirty-five respondents, or more than 10 percent of those who answered this question, noted that they were aware of barriers to fair housing choice related to land use policies. As indicated previously, respondents were also asked to discuss these questionable practices or barriers specifically in narrative format. Comments were then synthesized, and a number of common themes were collected, as presented below:

- Multifamily and mixed-income housing are often grouped together in less safe or transitional neighborhoods. This problem is worse in suburban communities and for disabled applicants and applicants with families; and
- In some cases, Not In My Backyard (NIMBY) tendencies, on the part of local government, restricted the development of group or special needs housing for persons with disabilities or substance abuse problems.

Zoning Laws

Zoning laws were also investigated as part of the survey. In total, 43 respondents, or 13 percent of those who answered this question, noted awareness of barriers to fair housing choice due to zoning laws. Narrative comments received in relation to this question included the following items:

- Local elected officials and bodies often did not approve group or multifamily projects or these projects were limited to certain areas, and
- These decision-makers may have been pressured by citizens and companies to prohibit special housing projects or exceptions to code.

Occupancy Standards or Health and Safety Codes

Forty-one respondents, or more than 12 percent of those who answered this question, noted that they were aware of fair housing issues caused by occupancy standards or health and safety codes. As indicated previously, respondents were also asked to discuss these questionable practices or barriers specifically in narrative format. Comments related to the following items:

- Occupancy standards in some areas were overly restrictive and discriminated against large families, including immigrants and persons with disabilities living in group settings;
- Codes were enforced more strictly against racial and ethnic minorities; and
- Codes were not enforced enough, and landlords were allowed to rent unsafe units.

Property Assessment and Tax Policies

An inquiry into barriers to fair housing choice in property tax policies showed that 18 respondents were aware of such issues. This figure represents more than 5 percent of persons who opted to answer this question. Comments cited the lack of tax incentives for specialty housing such as accessible housing.

Permitting Processes

The survey also addressed permitting processes as potential barriers to fair housing. Twenty-two respondents noted limited access to these services as a problem in Minnesota, which equated to almost 7 percent of persons who answered this question. Specific comments included reference to permitting documents not made available in alternate language formats.

Housing Construction Standards

Barriers to fair housing choice in housing construction standards were also addressed in the survey. Seventeen persons, or more than 5 percent of those who answered this question, noted fair housing issues in this area. Narrative comments received in relation to this question included the following items:

- Many small communities had no building code or building inspector; and
- Codes were difficult to understand, even for contractors, particularly regarding accessible housing.

Neighborhood or Community Development Policies

A total of 34 respondents, or more than 10 percent of persons who responded to this question, noted awareness of barriers to fair housing choice in neighborhood or community development policies. Specific comments stated that NIMBY attitudes toward some housing developments often affect local officials' decision-making processes.

Compliance Issues with Public Housing Authorities

Fifteen respondents, or nearly 5 percent of those who answered this question, noted awareness of compliance issues with public housing authorities in Minnesota. Examples they provided primarily related to the following items:

- Public housing authorities failed to provide reasonable accommodation or modification for persons with disabilities, including persons with service animals or mental health issues; and
- Requirements for access to services were often too stringent or limiting and did not allow for exceptions for applicants who had non-physical disabilities or irregular incomes or for nontraditional applicants such as single fathers.

Limited Access to Government Services

The survey was also used to examine awareness of situations wherein groups faced limited access to government services, including public transportation, public housing, and employment services. A total of 57 respondents, or nearly 18 percent of those who answered this question, noted limited access to these services as a problem in Minnesota. Specific comments provided include:

- Public transportation, particularly in the rural areas of the state but also in some suburbs, was not available, or it was difficult to use;
- Access to medical and employment services was limited by the lack of transportation and was sometimes not available in rural areas; and
- Information about public services was primarily available via the internet but was sometimes difficult to understand. Access to public services may be even more difficult for persons with disabilities and those without a permanent address.

Barriers to Minorities Serving as Representatives

The survey also asked respondents about their awareness of any barriers that limit minority populations' access to serving as representatives on state or local boards or commissions. Twenty-seven respondents, or more than 8 percent of those who answered this question, noted that this was an issue, and specific comments included the following items:

- Language and cultural barriers kept some minorities from connecting to local decision-making bodies. Even if they were aware of this process, some minority communities did not trust local government and did not want to become involved;
- Often, these positions were appointed or recruited by other community leaders who may not have known many members of minority groups; and
- Many minorities required public transportation, child care, and translation services, none of which are usually available at meetings.

Any Other Public Administrative Actions or Regulations

Respondents were also asked to discuss their awareness of barriers to fair housing in any other public administrative actions or regulations. Twenty-three respondents noted awareness of other issues, and relevant comments related to problems in local government land use policies that create fair housing barriers. Several respondents also noted that persons with criminal backgrounds did not have adequate access to housing and that public assistance vouchers were not applied fairly. However, these types of opinions demonstrate a lack of understanding of fair housing and affirmatively furthering fair housing.

Jurisdictional Definitions

The survey also asked respondents if they were aware of their jurisdiction's definitions for "dwelling unit," "family," and "disability." In total, 100 respondents, or more than 30 percent of those who answered this question, were aware of one or more of these definitions. However, narrative comments received in relation to this question were almost all definitions of "dwelling unit."

SUMMARY

The status of affirmatively furthering fair housing within Minnesota's public sector was primarily evaluated through a review of the placement of several types of assisted housing in the state; the relationships among the location of employment, job training centers, and transportation services; and the results of the public sector section of the fair housing survey.

Evaluation of the placement of public and other forms of assisted housing in the state, such as Section 8 properties, Low Income Housing Tax Credit housing, and supportive housing for special needs populations, demonstrated that these housing options are more plentiful in urban areas of the state and in a few rural areas.

An examination of the relationship among the location of employment centers, job training centers, and transit systems in the State of Minnesota revealed that these services appear to be adequate in the metro and suburban areas but may be less accessible in the rural areas of the state.

Results from the public sector section of the fair housing survey revealed that many respondents in Minnesota believed there were problematic practices or policies within the public sector. Several comments indicated that development of many types of housing, including group homes and multi-family housing, were restricted to less desirable areas due to community resistance, land use policies, and zoning laws. Respondents also addressed a lack of enforcement of health and safety codes; housing occupancy standards that restrict housing choice for families; local government policies that are often not available in multiple

languages; and a lack of public transportation, which may act as a barrier to accessing housing, government, and community services.

SECTION VII. PUBLIC INVOLVEMENT

This section discusses analysis of fair housing in Minnesota as gathered from various public involvement efforts conducted as part of the AI process. Sources include additional survey data and feedback collected from public input sessions.

FAIR HOUSING SURVEY

As discussed in previous sections, a fair housing survey comprised a large portion of the public involvement efforts associated with the development of the Minnesota AI. While data from the survey regarding policies and practices within the private and public sectors have already been discussed, the remaining portions of the survey findings are presented in the narrative below.

The purpose of the fair housing 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 organizations throughout the state were solicited to participate.

A total of 562 persons in Minnesota completed the survey, which was conducted mostly online. Individuals solicited for participation included representatives of housing groups, minority organizations, disability resource groups, real estate and property management associations, banking entities, fair housing advocates, members of the legal community, and other groups involved in the fair housing arena.

Most questions in the survey required simple "yes," "no," or "don't know" responses, although many questions allowed the respondent to offer written comments. While the numerical tallies of results are presented in this section, along with summaries of some comment-driven questions, a complete list of responses is included in Appendix E.

Table VII.1
Primary Role of Respondent
State of Minnesota
2011 Fair Housing Survey Data

Role	Total
Advocate/Service Provider	151
Local Government	139
Other (please specify)	60
Homeowner	50
Property Management	49
Banking/Finance	31
Renter/Tenant	23

Construction/Development	21
Law/Legal Services	15
Real Estate	11
Missing	12
Total	**562**

Respondents of the fair housing survey were asked to identify their primary role within the housing industry. As shown in Table VII.1, at right, 151 respondents represented advocate/service provider organizations in the state, 139 respondents represented local government, 50 respondents owned homes, and 49 respondents managed properties.

The next question asked respondents to gauge their familiarity with fair housing law. Results of this question are presented on the following page in Table VII.2. As shown, many respondents, 37.2 percent, indicated that they were somewhat familiar with fair housing law, 22.6 percent said that they were very familiar with fair housing law, and only 10 percent said that they were unfamiliar.

Table VII.2
Familiarity with Fair Housing Law
State of Minnesota
2011 Fair Housing Survey Data

Familiarity with Fair Housing Law	Respondents	% of Total
Not Familiar	56	10.0%
Somewhat Familiar	209	37.2%
Very Familiar	127	22.6%
Missing	170	30.2%
Total	**562**	**100.0%**

Table VII.3, below, shows the responses made to a number of questions regarding federal, state, and local fair housing laws. First, respondents were asked if fair housing laws were difficult to understand or follow. As shown, 117 respondents said that fair housing laws were difficult to understand or follow, which represents nearly one-third of respondents who answered this question. This finding suggests that fair housing laws may be perceived as complex, and outreach and education efforts may need to make the laws more approachable for the general public.

Respondents were also asked to indicate their understanding of the usefulness of fair housing laws in their communities. As shown, the majority of respondents indicated that fair housing laws were useful, with only 27 respondents who believed fair housing laws were not useful.

The third question of this section inquired if fair housing laws should be changed. Only 48 respondents indicated that fair housing laws should be changed, and written responses suggested modifying the state law to cover protection for persons with a criminal history and elderly persons as well as extending the state law to include persons who utilize Section 8 vouchers under the umbrella of the receipt of public assistance class. Sexual preference and mental health were also listed as areas that should be covered by fair housing law.

Comments also suggested that harsher penalties should be included for violators and that fair housing laws should be simpler and easier to understand.

Table VII.3
Federal, State, and Local Fair Housing Laws
State of Minnesota
2011 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total
Are fair housing laws difficult to understand or follow?	117	174	100	171	562
Do you think fair housing laws are useful?	298	27	69	168	562
Do you think fair housing laws should be changed?	48	131	197	186	562

The next section in the survey related to fair housing activities, including outreach and education and testing and enforcement. As presented on the following page in Table VII.4, when asked if there was a training process available to learn about fair housing laws, 185 respondents indicated affirmatively and 150 respondents noted that they had actually participated in fair housing training. Respondents were also asked about their awareness of fair housing testing; only 85 respondents were aware of such activity.

Questions in this section also invited respondents to gauge the current levels of fair housing activities in their communities. Ninety-six persons believed that fair housing laws were not adequately enforced, and 90 respondents suggested that there was a sufficient level of fair housing outreach and education activity in the state; however, 149 respondents said that outreach and education activities were insufficient. In terms of fair housing testing, most respondents did not appear to understand fair housing testing activities because most opted not to answer the question. However, 40 persons indicated that there was too little fair housing testing in their communities.

Table VII.4
Fair Housing Activities in Minnesota
State of Minnesota
2011 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total
Is there a training process available to learn about fair housing laws?	185	139	44	194	562
Have you participated in fair housing training?	150	69	10	333	562
Are you aware of any fair housing testing?	85	235	46	196	562
Do you feel fair housing laws are adequately enforced?	72	96	198	196	562

Testing and Education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity?	149	90	8	121	194	562
Is there sufficient testing?	40	15	6	74	427	562

Table VII.5
Protected Classes Cited
State of Minnesota
2011 Fair Housing Survey Data

Protected Classes	Total
Religion	156
Familial Status	113

As part of the process of measuring understanding of fair housing law through the survey instrument, respondents were asked to list their awareness of classes of persons protected by fair housing laws on a federal, state, and local level. Race and disability were offered as examples of protected classes in the question narrative. Results of this question are presented at right in Table VII.5 and show that, while many respondents were able to correctly identify several of the protected classes, including religion, familial status, sexual orientation, and national origin, comments also included a number of classes that have no such protection in the state or any city in the state, including income and domestic violence victim status. These findings fall in line with research presented in the literature review section of this document, which suggests that, nationally, many persons are not able to correctly list classes of persons protected by fair housing law in their community.

Sexual Orientation	108
National Origin	91
Age	80
Sex	79
Gender	72
Color	62
Marital Status	53
Public Assistance Status	39
Creed	33
Income	18
Ethnicity	17
Disability	15
Elderly	9
Children	4
Sexual Orientation	5
Veterans	3
Ancestry	2
Chemically Dependant	2
Education	2
Language Barriers	2
Victims of Domestic Violence	2
Other	86
Total	**1,053**

Respondents were also asked to indicate their awareness of where to refer persons who wish to file a fair housing complaint. The most frequent response was HUD, with 95 citations, followed by "Don't Know," with 44; the DHR had 41, which was followed by the Attorney General, County, City, and State, with 22, 21, 14, and 14, respectively. Legal Aid received 13, and a variety of other entities were cited, as presented in Table VII.6, on the following page.

Table VII.6
Fair Housing Violation Referrals
State of Minnesota
2011 Fair Housing Survey Data

Referral	Total
HUD	95
Don't Know	44
Department of Human Rights	41
Attorney General	22
County	21
City	14
State	14
Legal Aid	13
Housing Agency	8
Fair Housing Office	5
Federal Court	5
Manager	4
Secretary of State	3
Social Services	3
Other	2
ACLU	1
Sheriff	1
Union	1
Total	**297**

Table VII.7, below, shows tallied responses to survey questions related to the status of fair housing in Minnesota. First, respondents were asked if they were aware of a fair housing plan in their communities. A total of 101 respondents indicated affirmatively, but many respondents said that they did not know or did not answer this question.

Table VII.7
Status of Fair Housing
State of Minnesota
2011 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of a fair housing plan in your community?	101	177	42	242	562
Are there geographic areas that have fair housing problems?	57	54	210	241	562

Respondents were also asked to offer information about any specific geographic areas within the state that might have increased fair housing problems. While a number of respondents elected not to answer the question or indicated that they did not know, more than 57 respondents noted that certain geographic areas of Minnesota had fair housing issues, and written comments suggested that the following geographic areas may have increased problems with fair housing:

- Areas with high minority racial or ethnic concentrations such as in or near tribal lands or places with large migrant labor forces;
- Rural parts of the state where fair housing education activities might be less accessible;
- Several cities, including Bemidji, Duluth, Minneapolis, Richfield, and Saint Cloud; and

- Some counties, including Beltrami, Clay, Stearns, and Washington.

Respondents were also asked to offer any additional comments that they might have regarding fair housing in their communities. Though some classes of persons cited are not protected under state or local law, commonly expressed fair housing concerns were as follows:

- Frustrations regarding the lack of protection for persons with a criminal history or those released from prison as well as persons with poor credit history, especially in regard to access of assisted housing;
- Problems with repeat violators of fair housing law, which may be due to inadequate punishments;
- Issues with fair housing education not enhanced through provision of a curriculum, which may utilize examples of discrimination to teach laws in a simple manner;
- Less of a focus placed on education and encouraging persons who have encountered discrimination to file complaints rather than conducting testing activities; and
- Problems regarding local governments, which do not always publicize fair housing plans, hence making residents less aware of fair housing activities and goals in their communities and, in turn, making local governments less accountable.

REGIONAL FORUMS

Public input opportunities, or regional forums, were held in Detroit Lakes, Grand Rapids, Marshall, Saint Cloud, and St. Paul the week of October 17, 2011, as part of the consolidated planning process. The purpose of the forums was to allow the public the chance to learn more about the consolidated planning process, including why the AI was conducted as well as what preliminary findings were discovered. Comments, including reactions to the initial list of impediments, were accepted from both agencies and citizens in attendance. A complete set of the comments received at these forums is presented in the 2012 to 2016 Consolidated Plan, although, due to a technical difficulty, the comments were not recorded at the Grand Rapids forum. Comments received at the forums, relevant to fair housing and affirmatively furthering fair housing, included the following:

- Some barriers to fair housing may vary widely throughout the state. For example, access to transportation services can be a much more influential barrier in the rural areas of Minnesota, where no set public transportation lines exist compared to the urban areas where access to transportation may not be as prominent an issue;
- Furthermore, fair housing can be complicated on a statewide level because state agencies may lack the power or resources to adequately support fair housing needs on a local level such as by monitoring zoning and land use policies to ensure that they uphold the tenets of affirmatively furthering fair housing; and
- There appears to be some confusion regarding the differences among fair housing, adequate affordable housing production, and landlord/tenant relationship issues.

WRITTEN COMMENT

Sponsoring agencies of the AI also received written comment on the draft report. Suggestions provided in written comment have been incorporated into the analysis. Copies of written correspondence to and from sponsoring agencies can be obtained by contacting Jim Cegla at Minnesota Housing.[87]

SUMMARY

Public involvement opportunities were an intrinsic part of the development of this AI. Activities included a fair housing survey, which evaluated current fair housing efforts, and forums wherein citizens were offered the chance to comment on initial findings of the AI and to provide feedback on prospective impediments.

Results of the fair housing survey, which was completed by 562 persons throughout Minnesota, showed that most respondents felt that fair housing laws were useful but that they may be difficult to understand or follow. While many respondents said that they were aware of fair housing training, such as classes and seminars, less than 30 percent of respondents said that they had taken part in any fair housing training. Respondents also showed less familiarity with the classes of persons protected by fair housing laws in Minnesota as well as where to refer someone with a housing complaint. Many respondents noted the need for increased fair housing education and outreach activities, and a moderate need was indicated for increased testing and enforcement activities, especially outside of the Twin Cities metropolitan region with the exception of Duluth. Some respondents wanted fair housing laws changed in the state, and suggestions for revision included adding protection for persons with a criminal history and including Section 8 recipients under the umbrella of receipt of public assistance. Stricter penalties for violations of fair housing laws were also suggested.

Regional forums held in several locations throughout Minnesota in October 2011 allowed citizens and agencies to voice concerns about barriers to fair housing choice. Comments received at these sessions indicated issues related to the difficulties associated with addressing fair housing in urban versus suburban versus rural areas in the state as well as problems regarding inadequately monitoring local policies and practices to ensure compliance with fair housing laws. Public input opportunities were also created after release of the draft report for public review; written comments were also received, which influenced the content of this final report.

[87] Jim.cegla@mnhousing.org

SECTION VIII. RESEARCH CONCLUSIONS

Data from the Census Bureau showed that, between 2000 and 2010, the population in the State of Minnesota grew from 4.9 million to 5.3 million persons, or by 7.8 percent. During this time, the composition of the population changed to represent a greater share of racial and ethnic minority groups. Changes in distribution of these groups between 2000 and 2010 revealed that several populations, including black, Asian, and Hispanic groups, experienced double-digit increases in population. Some of these racial and ethnic groups were also slightly concentrated in some parts of the state, although the changes in concentration between 2000 and 2010 were moderate. As of 2000, other groups, including disabled persons, also showed slight disproportionate concentrations in some census tracts such as near tribal lands and Minneapolis.

A review of laws, studies, cases, and related materials relevant to fair housing in the State of Minnesota demonstrated the complexity of the fair housing landscape. It was determined that state law and several local ordinances offer protections beyond the scope of the federal Fair Housing Act. Examination of these conditions revealed issues of discrimination in the rental markets, including refusal to rent and harassment, potentially unfair lending practices in the home purchase markets, resistance to development of group housing, and unbalanced enforcement of housing codes.

In Minnesota, several organizations provide fair housing services, including outreach and education, complaint intake, and testing and enforcement activities for both providers and consumers of housing. These organizations include a HUD field office, the Minnesota DHR, the Duluth Human Rights Department, the Minneapolis Department of Civil Rights, and the St. Paul Human Rights Division. A number of other organizations also contribute to affirmatively furthering fair housing through legal advocacy or other services, such as the Legal Aid Society of Minneapolis and Legal Aid Services of Northeastern Minnesota.

Home Mortgage Disclosure Act (HMDA) data were used to analyze differences in denial rates in the State of Minnesota by race, ethnicity, sex, income, and census tract. Evaluated home purchase loan applications from 2004 through 2009 showed that there were 468,180 loan originations and more than 83,354 loan denials, for an average six-year loan denial rate of 15.1 percent. Denial rates fell from 17.6 percent in 2006 to 11.6 percent in 2009. These HMDA data also showed that black, American Indian, and Hispanic applicants experienced significantly higher rates of loan denials than white or Asian applicants, even after correcting for income. Further, these highly denied racial and ethnic groups appear to have been disproportionately impacted in some geographic areas of the state wherein denial rates exceeded 75 percent.

Analysis of high annual interest rate lending showed that black, American Indian, Asian, and Hispanic populations were also disproportionately impacted by an unusually higher share of lower-quality loan products. Hispanic and American Indian applicants experienced a rate double than that of white applicants, while black applicants experienced a rate more than three times that of white applicants. With such high proportions of these minorities receiving lower-quality, high-interest rate loans, the burden of foreclosure likely tended to fall more heavily upon these particular groups.

Analysis of data from the Community Reinvestment Act (CRA), which was developed to encourage investment in communities of low- and moderate-income areas, showed that business loans were likely not sufficiently originated in areas with higher levels of poverty in the State of Minnesota.

Fair housing complaint data was requested from HUD and the Minnesota Department of Human Rights (DHR). Data from these sources showed that 682 complaints were filed in the state from January 2004 through June 2011. The number of complaints filed with these agencies varied by year and ranged from 76 to 106, with 2011 excluded as a partial year. Housing complaint data was also received from the Legal Aid Society of Minneapolis. The protected classes disproportionately impacted by discrimination in rental markets based on successfully conciliated complaints were disability, race, familial status, and national origin. The most common issues regarding these complaints were:

- Failure to make reasonable accommodation;
- Discriminatory terms, conditions, or privileges relating to rental;
- Discriminatory refusal to rent; and
- Discriminatory terms, conditions, privileges, or services and facilities.

A review of a sample of more than 550 Craigslist postings throughout the state from September 2011 revealed few instances of poor language choices in advertisements for housing in the rental market, with some preferential statements made based on sex, age, and familial status.

Results from the private sector portion of a fair housing survey, which was conducted as part of the AI process, showed that many respondents saw possible issues of housing discrimination in Minnesota's private housing sector. Issues described by respondents regarding the rental markets related to denial of available units, refusal to rent, discriminatory terms and conditions, and failure to make reasonable accommodation or modification. In the home purchase and lending industries, comments related to steering, redlining, denial of loans, and predatory lending. Additional concerns voiced about the private housing sector in Minnesota included failure to comply with disability codes in housing construction and location- and race-based discrimination in the home insurance and home appraisal industries.

Evaluation of the placement of public and other forms of assisted housing in the state, such as Section 8 properties, Low Income Housing Tax Credit housing, and supportive housing for special needs populations, demonstrated that these housing options are more plentiful in urban areas of the state and in a few rural areas.

An examination of the relationship among the location of employment centers, job training centers, and transit systems in the State of Minnesota revealed that these services appear to be adequate in the metro and suburban areas but may be less accessible in the rural areas of the state.

Results from the public sector section of the fair housing survey revealed that many respondents in Minnesota believed there were problematic practices or policies within the public sector. Several comments indicated that development of many types of housing, including group homes and multi-family housing, were restricted to less desirable areas due to community resistance, land use policies, and zoning laws. Respondents also addressed a lack of enforcement of health and safety codes; housing occupancy standards that restrict housing choice for families; local government policies that are often not available in multiple languages; and a lack of public transportation, which may act as a barrier to accessing housing, government, and community services.

Results of the fair housing survey, which was completed by 562 persons throughout Minnesota, showed that most respondents felt that fair housing laws were useful but that they may be difficult to understand or follow. While many respondents said that they were aware of fair housing training, such as classes and seminars, less than 30 percent of respondents said that they had taken part in any fair housing training. Respondents also showed less familiarity with the classes of persons protected by fair housing laws in Minnesota as well as where to refer someone with a housing complaint. Many respondents noted the need for increased fair housing education and outreach activities, and a moderate need was indicated for increased testing and enforcement activities, especially outside of the Twin Cities metropolitan region with the exception of Duluth. Some respondents wanted fair housing laws changed in the state, and suggestions for revision included adding protection for persons with a criminal history and including Section 8 recipients under the umbrella of receipt of public assistance. Stricter penalties for violations of fair housing laws were also suggested.

Regional forums held in several locations throughout Minnesota in October 2011 allowed citizens and agencies to voice concerns about barriers to fair housing choice. Comments received at these sessions indicated issues related to the difficulties associated with addressing fair housing in urban versus suburban versus rural areas in the state as well as problems regarding inadequately monitoring local policies and practices to ensure compliance with fair housing laws. Public input opportunities were also created after release

of the draft report for public review; written comments were also received, which influenced the content of this final report.

SECTION IX. IMPEDIMENTS AND SUGGESTED ACTIONS

Provisions to affirmatively further fair housing are long-standing components of HUD's housing and community development programs. In exchange for receiving federal funds from HUD, the State of Minnesota certifies that it is affirmatively furthering fair housing. The requirements of such certification comprise the following elements:

1. Conduct an Analysis of Impediments to Fair Housing Choice,
2. Take actions to remedy impediments if impediments are identified, and
3. Maintain records of the analysis and actions taken.

This report, which represents the first element in the certification process noted above, has resulted in several impediments to fair housing choice. HUD's definition of an impediment, reprinted here from the *Fair Housing Planning Guide*, page 2-8, notes that impediments to fair housing choice are:

• "Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices [and]

• Any actions, omissions or decisions that have this *effect*."[88]

While several issues within the housing market were uncovered in the process of conducting this AI, only issues that qualify as impediments to fair housing choice were included based on the definition printed immediately above, albeit with the inclusion of the additional classes of persons protected by state law and local ordinances.

The identified impediments are listed below for both the private and public housing sectors and are accompanied by specific actions that the State will follow in an attempt to remedy them. The State acknowledges that there are public and private organizations that are equipped, empowered, and responsible for testing and enforcing fair housing compliance. Unlike those organizations, the DEED, Minnesota Housing, and DHS are not fair housing enforcement agencies, but will take steps within their programs to affirmatively further fair housing.

Proactively Enhancing Choice

Though this report by necessity focuses on identifying and addressing impediments to fair housing choice, Minnesota Housing, as part of its normal business, proactively enhances housing choice by the structure of its program application processes that gives priority to developments and programs that further economic integration and access to transportation. In addition to promoting housing choice through its standard selection processes, Minnesota looks for unique opportunities to enhance choice. In 2012 Minnesota Housing applied in partnership with DHS to HUD for Section 811 funds to subsidize the rents of people with disabilities. The program targets both persons and families with disabilities who are experiencing homelessness, and expands housing choices for disabled persons by moving institutionalized Medicaid enrollees into the community as part of the HHS "Money Follows the Person" program.

IMPEDIMENTS TO FAIR HOUSING CHOICE AND SUGGESTED ACTIONS

Private Sector Impediments, Actions, and Measurable Objectives

Impediment 1: Lack of understanding of fair housing and affirmatively furthering fair housing

Action 1.1: Ensure that Minnesota Housing-financed rental developments have Affirmative Fair Housing Marketing Plans
Measurable Objective 1.1: Number of approved AFHMPs

Action 1.2: Review AFHMPs of Section 8 developments for which Minnesota Housing manages the subsidy at least every 5 years.
Measurable Objective 1.2: Number of AFHMPs reviewed and, if necessary, modified.

Action 1.3: Explore a model to identify non Section 8 multifamily developments with AFHMPs that may be out of date and require review and modification.
Measurable Objective 1.3: A model is developed and implemented.

Action 1.4: Review marketing activities for compliance with the AFHMP and that the fair housing logo is used in advertising materials.
Measurable Objective 1.4: Number of reviews of AFHMPs.

Action 1.5: Distribute flyers and education materials at annual conferences, public venues, and other opportunities
Measurable Objective 1.5: Number of materials distributed

Action 1.6: Explore with the Minnesota Multi Housing Association possibilities for training multifamily property owners, managers, and service providers
Measurable Objective 1.6.1: Document meetings with the Association
Measurable Objective 1.6.2: Publicize the availability of training to Minnesota Housing-associated rental property owners or managers

Action 1.7: Support HousingLink's efforts to educate owners and tenants on fair housing
Measurable Objective 1.7: Provide funding to HousingLink

Action 1.8: Implement the Sustainable Communities grant to develop best practices and fair housing resources for rental owners
Measurable Objective 1.8: Developers and owners will be encouraged to use the work product when it becomes available.

***Impediment 2*: Discriminatory terms and conditions in rental markets**
Action 2.1: Conduct outreach and education activities for housing providers
Measurable Objective 2.1: Support the "Working Together" conference

Action 2.2: Support HousingLink's efforts to educate owners and tenants on fair housing
Measurable Objective 2.2: Provide funding to HousingLink

Action 2.3: Review policies of Section 8, LIHTC, and HOME assisted housing for discriminatory terms and conditions in leases, house rules and tenant selection plans and occupancy policies.
Measurable Objective 2.3: Results of the reviews

***Impediment 3*: Failure to make reasonable accommodation or modification**

Action 3.1: Conduct outreach and education activities for housing providers

Measurable Objective 3.1.1: Support the "Working Together" conference

Measurable Objective 3.1.2: Ensure that rent-assisted housing have formal grievance procedures that provide resolution of complaints alleging discrimination based on disability

Action 3.2: Support HousingLink's efforts to educate owners and tenants on fair housing issues, including reasonable accommodation

Measurable Objective 3.2: Provide funding to HousingLink

***Impediment 4*: Discriminatory refusal to rent**

Action 4.1: Conduct outreach and education activities for housing providers

Measurable Objective 4..1: Support the "Working Together" conference

Action 4.2: Periodically review occupancy of Tax Credit developments and evaluate whether households of color and disabled persons are under-represented.

Measurable Objective 4.2: Production of periodic report

Action 4.3: Discuss with the Minnesota DHR how testing and enforcement can be supported by DEED, DHS, and Minnesota Housing

Measurable Objective 4.3.1: Determine appropriate support roles of DEED, Minnesota Housing, and DHS

Measurable Objective 4.3.2: Execute support roles.

***Impediment 5*: Failure to comply with federal and state accessibility standards**

Action 5.1: Conduct outreach and education activities for housing providers

Measurable Objective 5.1: Number of outreach and education activities conducted

Action 5.2: Ensure that multifamily developments newly-financed by Minnesota Housing comply with applicable building codes and accessibility and visitability standards

Measurable Objective 5.2: Number of financed developments that are found to be compliant

Action 5.3: Consult with representatives of the disability community to understand the type of housing discrimination the disabled population experiences and to consider whether there are strategies for how Minnesota Housing's programs can be marketed to owners and developers who are identified as having failed to comply with accessibility standards.

Measurable Objective 5.3: Conduct at least one meeting with disability community representatives and consider implementing viable strategies.

***Impediment 6*: Steering in the home purchase and rental markets**

Action 6.1: Support the Emerging Markets Homeownership Initiative

Measurable Objective 6.1(a): Number of advisory council meetings attended

Measurable Objective 6.1(b): Funding support for the Minnesota Home Ownership Center

Measurable Objective 6.1(c): Number of realtors and lenders of color who have been trained on Minnesota Housing homebuyer programs

Action 6.2: Market mortgages and downpayment assistance to households of color
Measurable Objective 6.2: Number of loans to households of color that are made or purchased by Minnesota Housing

Action 6.3: Educate homebuyers on the responsibilities and roles of realtors, lenders, and other actors who will be involved in their home buying experience so that they may recognize steering should it occur.
Measurable Objective 6.3: Number of persons attending Home Ownership Center homebuyer training.

Action 6.4: Provide housing subsidy for persons with serious mental illness
Measurable Objective 6.4: Number of households receiving assistance

Action 6.5: Provide permanent supportive housing for persons and families with mental illness, substance abuse disorders, or HIV/AIDS who are homeless or at risk of homelessness
Measurable Objective 6.5: Number of households provided permanent supportive housing

***Impediment 7*: Denial of home purchase loans**

Action 7.1: Enhance homebuyer understanding of real estate transactions, provide information on resources available to them if they are denied credit or feel they are discriminated against in the mortgage market, and establishing and keeping good credit through education and training
Measurable Objective 7.1: Number of persons attending Home Ownership Center homebuyer training.

Action 7.2: Reach out to lenders, realtors, and emerging market communities through industry and emerging market community events to make them aware of Minnesota Housing's first time homebuyer programs
Measurable Objective 7.2.(a): Number of events attended or sponsored
Measurable Objective 7.2.(b) Percent of loans made to emerging market borrowers

***Impediment 8*: Predatory-style lending activities**

Action 8.1: Enhance homebuyer understanding of real estate transactions so that they may recognize predatory lending and provide resources for them to discuss possible predatory loan products.
Measurable Objective 8.1: Number of attendees of homeownership training

Action 8.2: Limit subordinations of HOME HELP downpayment assistance loans to mortgages at prevailing rates and fees for the borrower's risk category
Measurable Objective 8.2: The number of requests for subordination to predatory loans that are rejected.

Public Sector Impediments, Actions, and Measurable Objectives

***Impediment 1*: Insufficient fair housing outreach and education efforts**

Action 1.1: Work with Minnesota NAHRO and the Minnesota Multi Housing Association to provide education to public sector housing providers through at their annual conferences

Measurable Objective 1.1: Number of outreach and education activities conducted

Action 1.2: Distribute fair housing flyers and education materials at annual conferences, public venues, and other opportunities

Measurable Objective 1.2: Number of materials distributed

***Impediment 2*: Lack of sufficient fair housing testing and enforcement activities**

Action 2.1: Determine with the Minnesota DHR the process of testing and enforcement and how it can be supported by DEED, DHS, and Minnesota Housing

Measurable Objective 2.1.1: Determine appropriate support roles of DEED, Minnesota Housing, and DHS

Measurable Objective 2.2.1: Execute support roles.

***Impediment 3*: NIMBYism (Not in My Backyard) tendencies and planning and zoning decisions affect housing availability**

Action 3.1: Incent decisions by communities that decrease segregation and increase economic integration of populations

Measurable Objective 4.1: Number of Minnesota Housing developments that are awarded selection points for zoning flexibility and economic integration

Action 3.2: Provide internet links and other pre-existing materials to city staff and developers to inform citizens about affordable housing to reduce NIMBYism.

Measurable Objective 3.2: Number of internet links on Minnesota Housing's webpage, and other materials identified to be made available to city staff and developers.

Impediments Matrix

Table IX.1, on the following page, lists the impediments, by private and public sector, and demonstrates which sources supported the issue as an impediment to fair housing choice within the State of Minnesota. The protected classes most often cited in relation to the impediment has been included as well. Furthermore, the matrix includes a ranking code that indicates the severity of the problem with "H" indicating high, "M" indicating moderate, and "L" indicating low.

Table IX.1
Impediments Matrix
State of Minnesota
2011 Analysis of Impediments to Fair Housing Choice

Impediment	Source										Protected Classes Affected	Ranking
	Census Data	Review of Fair Housing Profile	Literature/Case Review	HMDA Data	Housing Complaint Review	Advertisement Analysis	Public Services Review	Fair Housing Survey	Regional Forums	Other		
Private Sector												
Lack of understanding of fair housing and affirmatively furthering fair housing			X			X		X	X		All	H
Discriminatory terms and conditions in the rental markets		X			X			X			National origin, race, disability	H
Failure to make reasonable accommodation or modification					X			X	X		Disability	H
Discriminatory refusal to rent					X			X			Familial status, race, national origin, disability	M
Failure to comply with federal and state accessibility standards			X					X			Disability	M
Steering in the home purchase and rental markets	X				X			X			Race, familial status, national origin	H
Denial of home purchase loans				X				X			Race, national origin	M
Predatory-style lending activities				X				X			Race, national origin	M
Public Sector												
Insufficient fair housing outreach and education efforts			X					X	X		All	H
Lack of sufficient fair housing testing and enforcement activities					X		X	X			All	H
Zoning decisions that affect placement of multifamily housing	X							X			Familial status, race, ethnicity	M
NIMBYism tendencies affect housing availability								X			Disability, familial status	L
Lack of involvement in AI development process by Minnesota HRD					X			X			All	M

-APPENDIX A: ADDITIONAL CENSUS DATA

This section of the document contains additional data from the Census Bureau.

Table A.1
Group Quarters Population
State of Minnesota
Census Bureau Data

Group Quarters	2000 Census		2010 Census		00 - 10 % Change
	Population	% of Total	Population	% of Total	
Institutionalized					
Correctional Institutions	16,999	27.0%	20,397	36.2%	20.0%
Juvenile Facilities	.	.	2,541	4.5%	.
Nursing Homes	40,506	64.2%	32,989	58.6%	-18.6%
Other Institutions	5,553	8.8%	381	0.7%	-93.1%
Total	**63,058**	**100.0%**	**56,308**	**100.0%**	**-10.7%**
Noninstitutionalized					
College Dormitories	44,835	61.6%	50,444	63.8%	12.5%
Military Quarters	12	0.0%	0	0.0%	-100.0%
Other Noninstitutional Group Quarters	27,978	38.4%	28,643	36.2%	2.4%
Total	**72,825**	**100.0%**	**79,087**	**100.0%**	**8.6%**
Group Quarters Population	**135,883**	**100.0%**	**135,395**	**100.0%**	**-0.4%**

APPENDIX B: ADDITIONAL BEA DATA

This section of the document contains additional Bureau of Economic Analysis (BEA) data, as they pertain to employment and income.

Table B.1
Total Employment and Real Personal Income
State of Minnesota
BEA Data 1969 Through 2010, 2010 Dollars

Year	1,000s of 2010 Dollars						Per Capita Income	Total Employment	Average Real Earnings Per Job
	Earnings	Social Security Contributions	Residents Adjustments	Dividends, Interest, Rents	Transfer Payments	Personal Income			
1969	56,989,656	3,746,806	-157,533	9,309,532	5,564,106	67,958,955	18,084	1,690,875	33,705
1970	58,345,574	3,760,115	-129,916	9,605,165	6,248,736	70,309,443	18,429	1,698,995	34,342
1971	58,622,689	3,948,913	-121,978	9,818,034	6,905,931	71,275,763	18,505	1,706,080	34,362
1972	61,402,878	4,312,743	-126,246	10,029,713	7,321,914	74,315,516	19,219	1,780,093	34,496
1973	69,435,700	5,259,135	-148,048	10,740,586	8,131,003	82,900,106	21,338	1,877,806	36,977
1974	67,449,968	5,512,680	-121,877	11,373,202	8,745,199	81,933,813	21,016	1,921,458	35,104
1975	64,868,901	5,325,856	-110,786	11,579,097	9,639,093	80,650,450	20,543	1,920,410	33,780
1976	66,966,401	5,759,680	-133,256	11,888,163	10,005,312	82,966,941	20,968	1,976,597	33,880
1977	71,572,558	5,994,245	-161,225	12,624,548	9,892,156	87,933,792	22,095	2,033,789	35,191
1978	76,080,412	6,605,050	-192,155	13,150,034	9,924,560	92,357,802	23,062	2,121,891	35,856
1979	78,342,638	7,225,913	-222,297	13,942,715	10,245,760	95,082,903	23,546	2,217,688	35,327
1980	77,197,526	7,209,521	-212,945	15,800,541	11,255,751	96,831,352	23,704	2,248,180	34,338
1981	76,275,924	7,668,986	-276,392	17,932,713	11,811,482	98,074,741	23,853	2,232,802	34,161
1982	74,542,665	7,693,464	-305,315	20,063,734	12,517,305	99,124,924	23,993	2,192,337	34,002
1983	75,193,735	7,993,286	-350,163	20,797,717	12,982,317	100,630,320	24,298	2,219,348	33,880
1984	83,644,200	8,880,468	-439,772	22,245,814	13,126,240	109,696,015	26,383	2,324,144	35,989
1985	86,527,830	9,406,298	-513,406	22,813,183	13,538,412	112,959,721	26,997	2,385,204	36,277
1986	90,066,489	10,024,396	-570,987	23,578,684	13,838,373	116,888,163	27,797	2,417,493	37,256
1987	94,833,176	10,434,361	-641,150	23,479,218	13,874,823	121,111,705	28,596	2,509,308	37,792
1988	97,336,335	11,322,347	-750,996	23,713,870	14,158,789	123,135,652	28,661	2,580,304	37,723
1989	101,111,381	11,681,836	-697,505	25,867,415	14,828,750	129,428,206	29,835	2,633,745	38,391
1990	103,305,850	12,109,086	-715,192	26,777,286	15,347,044	132,605,902	30,207	2,691,896	38,376
1991	103,014,969	12,405,092	-701,447	26,448,920	15,949,122	132,306,473	29,793	2,717,271	37,912
1992	109,333,407	13,039,952	-736,431	25,993,571	16,937,071	138,487,666	30,805	2,762,016	39,584
1993	109,891,893	13,434,515	-727,480	25,995,299	17,488,570	139,213,767	30,556	2,816,645	39,015
1994	115,684,343	14,155,659	-774,984	28,159,084	18,011,035	146,923,819	31,868	2,903,666	39,841
1995	118,865,012	14,655,779	-820,268	30,636,635	18,670,410	152,696,011	32,766	2,994,740	39,692
1996	126,360,557	15,254,981	-895,180	32,995,287	19,173,485	162,379,168	34,454	3,056,007	41,349
1997	131,127,423	15,871,610	-1,000,160	35,514,271	19,128,824	168,898,748	35,458	3,109,004	42,177
1998	142,206,845	16,889,730	-1,063,371	38,498,033	19,582,043	182,333,820	37,880	3,180,780	44,708
1999	150,169,089	17,768,658	-1,186,606	38,414,840	20,314,770	189,943,436	38,975	3,248,445	46,228
2000	159,177,970	18,616,642	-1,276,989	40,163,059	21,313,498	200,760,896	40,692	3,317,475	47,982
2001	160,936,436	18,870,009	-1,326,167	38,715,794	23,379,833	202,835,886	40,707	3,332,668	48,291
2002	163,874,606	19,032,343	-1,320,157	36,926,969	24,957,211	205,406,287	40,927	3,327,031	49,256
2003	167,434,623	19,389,697	-1,337,741	37,161,296	25,617,604	209,486,085	41,454	3,340,309	50,126
2004	172,643,242	19,908,109	-1,372,944	37,773,887	26,214,360	215,350,436	42,328	3,383,704	51,022
2005	172,433,516	20,107,527	-1,336,738	37,205,067	26,462,983	214,657,301	41,929	3,446,265	50,034
2006	173,409,048	20,364,696	-1,273,002	40,640,077	28,192,940	220,604,368	42,723	3,491,927	49,660
2007	175,306,522	20,618,024	-1,327,507	42,386,922	29,982,612	225,730,525	43,349	3,535,540	49,584
2008	178,600,986	20,833,229	-1,311,739	44,062,601	31,803,108	232,321,728	44,277	3,524,345	50,676
2009	167,272,258	19,993,229	-1,176,600	37,439,344	36,226,363	219,768,136	41,614	3,423,872	48,855
2010	172,687,160	20,219,141	-1,197,339	38,386,062	37,887,048	227,543,790	42,847	3,418,726	50,512

Table B.2
Employment by Industry
State of Minnesota
BEA Data

NAICS Categories	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	% Change 00-09
Farm employment	100,675	101,381	92,186	90,484	87,109	86,995	83,325	83,868	81,796	86,706	-13.9%
Forestry, fishing, related activities, and other	11,279	11,030	12,128	11,004	11,721	12,018	12,060	12,629	13,156	13,325	18.1%
Mining	8,677	7,695	7,259	7,162	6,912	6,928	7,387	8,027	9,061	9,194	6.0%
Utilities	13,057	12,830	12,382	12,237	12,238	12,303	12,409	12,690	13,224	13,519	3.5%
Construction	174,885	181,964	183,651	188,960	194,901	200,466	198,332	192,578	181,057	161,064	-7.9%
Manufacturing	407,223	389,023	368,408	356,499	354,667	358,465	358,444	355,006	348,742	312,837	-23.2%
Wholesale trade	138,660	140,343	137,118	136,605	138,862	141,851	143,977	143,869	143,847	136,916	-1.3%
Retail trade	373,076	372,237	371,432	372,897	372,913	377,064	375,244	374,984	363,991	345,999	-7.3%
Transportation and warehousing	108,925	111,861	105,350	103,821	105,693	109,125	107,468	109,679	108,448	102,347	-6.0%
Information	76,481	77,536	73,268	68,274	67,341	68,235	66,820	68,450	67,882	65,447	-14.4%
Finance and insurance	173,547	173,047	177,003	180,223	181,016	184,720	185,693	191,561	197,051	204,415	17.8%
Real estate and rental and leasing	94,206	97,015	102,522	110,908	119,549	129,038	133,371	134,742	132,129	130,284	38.3%
Professional and technical services	182,387	184,184	181,714	182,100	188,369	190,788	196,345	207,254	208,567	202,042	10.8%
Management of companies and enterprises	64,152	65,791	62,467	61,551	65,272	64,827	67,544	68,624	72,624	71,410	11.3%
Administrative and waste services	155,715	152,993	152,134	153,731	159,514	161,459	170,522	173,697	167,672	154,748	-0.6%
Educational services	55,183	60,987	65,612	67,279	68,495	70,192	74,846	76,227	79,432	80,156	45.3%
Health care and social assistance	340,874	342,386	358,214	370,286	377,829	385,169	400,958	418,859	430,669	440,167	29.1%
Arts, entertainment, and recreation	63,689	63,965	67,666	68,916	69,753	71,837	74,400	77,313	79,236	80,188	25.9%
Accommodation and food services	196,939	202,951	205,554	207,665	212,226	217,831	219,022	222,028	220,264	213,709	8.5%
Other services, except public administration	171,181	175,229	181,549	181,495	180,440	181,691	184,049	184,071	183,517	178,116	4.1%
Government and government enterprises	406,664	408,220	409,414	408,212	408,884	415,263	419,711	419,384	419,937	416,479	2.4%
Total	**3,317,475**	**3,332,668**	**3,327,031**	**3,340,309**	**3,383,704**	**3,446,265**	**3,491,927**	**3,535,540**	**3,522,302**	**3,419,068**	**3.1%**

Table B.3
Real Earnings Per Job by Industry
State of Minnesota
BEA Data, 2010 Dollars

NAICS Categories	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	% Change 00-09
Farm employment	17,823	12,090	12,776	24,571	32,378	39,296	34,473	32,421	55,211	35,652	100.0%
Forestry, fishing, related activities, and other	30,057	33,022	27,932	31,730	29,396	27,792	28,659	27,308	26,316	26,430	-12.1%
Mining	67,285	65,884	63,023	65,642	71,258	72,468	74,063	64,409	71,439	52,992	-21.2%
Utilities	94,903	108,795	114,116	109,256	118,954	112,278	117,405	110,070	114,549	113,165	19.2%
Construction	59,656	60,336	60,693	60,323	60,882	58,370	56,838	55,076	53,842	50,494	-15.4%
Manufacturing	62,147	62,611	66,381	69,315	70,888	68,417	67,858	67,542	67,826	69,049	11.1%
Wholesale trade	74,158	73,926	75,387	76,873	78,233	78,208	78,446	80,032	81,466	79,303	6.9%
Retail trade	28,983	28,452	29,024	29,196	29,409	28,088	27,531	27,091	26,662	26,642	-8.1%
Transportation and warehousing	56,462	57,580	57,131	58,650	58,780	56,620	52,797	52,670	53,875	50,880	-9.9%
Information	61,530	63,312	65,670	67,432	69,477	67,172	67,023	67,942	67,796	67,026	8.9%
Finance and insurance	68,068	72,703	72,633	74,983	76,988	75,762	77,281	76,288	69,164	64,545	-5.2%
Real estate and rental and leasing	38,458	31,863	33,053	30,674	27,875	25,472	23,969	20,503	20,907	20,318	-47.2%
Professional and technical services	68,943	67,041	66,600	66,006	65,717	66,351	67,544	67,611	69,862	68,564	-0.5%
Management of companies and enterprises	108,002	115,609	116,577	115,627	121,339	114,695	114,515	125,775	132,272	109,747	1.6%
Administrative and waste services	28,996	31,171	31,517	31,552	31,062	31,606	30,811	30,456	30,807	30,148	4.0%
Educational services	28,478	27,562	27,931	28,339	29,038	28,083	27,762	28,560	28,994	29,841	4.8%
Health care and social assistance	42,711	44,696	46,475	47,345	48,387	47,906	48,266	48,045	47,968	48,653	13.9%
Arts, entertainment, and recreation	22,206	22,662	23,385	24,575	24,636	23,468	24,940	24,460	23,674	22,228	0.1%
Accommodation and food services	18,718	18,833	18,789	19,119	19,329	18,679	18,573	19,028	18,322	18,159	-3.0%
Other services, except public administration	35,168	32,937	34,847	33,902	34,559	34,675	33,912	33,890	32,492	32,404	-7.9%
Government and government enterprises	51,207	52,347	54,377	55,624	56,129	55,789	55,800	56,460	57,978	59,455	16.1%
Total	**47,982**	**48,291**	**49,256**	**50,126**	**51,022**	**50,034**	**49,660**	**49,584**	**50,311**	**48,863**	**1.8%**

Table B.4
Real Earnings by Industry
State of Minnesota
BEA Data, 2010 Dollars

NAICS Categories	2000	2003	2004	2005	2006	2007	2008	2009	2010	% Change 00-10
Farm earnings	1,794,289	2,223,263	2,820,402	3,418,590	2,872,456	2,719,067	4,516,074	3,091,205	3,674,867	104.8%
Forestry, fishing, related activities, and other	339,016	349,162	344,546	334,004	345,624	344,874	346,208	352,185	378,231	11.6%
Mining	583,836	470,131	492,536	502,059	547,102	517,010	647,310	487,213	626,534	7.3%
Utilities	1,239,143	1,336,964	1,455,760	1,381,361	1,456,879	1,396,787	1,514,794	1,529,873	1,574,717	27.1%
Construction	10,433,007	11,398,547	11,866,048	11,701,171	11,272,713	10,606,517	9,748,540	8,132,835	7,833,961	-24.9%
Manufacturing	25,307,747	24,710,789	25,141,769	24,525,221	24,323,137	23,977,977	23,653,849	21,601,064	22,017,437	-13.0%
Wholesale trade	10,282,747	10,501,235	10,863,541	11,093,880	11,294,409	11,514,140	11,718,583	10,857,876	11,424,570	11.1%
Retail trade	10,812,994	10,887,092	10,967,038	10,590,834	10,330,900	10,158,544	9,704,634	9,218,209	9,380,945	-13.2%
Transportation and warehousing	6,150,115	6,089,149	6,212,623	6,178,667	5,674,026	5,776,827	5,842,628	5,207,420	5,218,849	-15.1%
Information	4,705,868	4,603,832	4,678,665	4,583,516	4,478,454	4,650,639	4,602,136	4,386,630	4,427,248	-5.9%
Finance and insurance	11,812,993	13,513,704	13,936,108	13,994,833	14,350,537	14,613,741	13,628,889	13,193,914	13,231,706	12.0%
Real estate and rental and leasing	3,622,991	3,401,992	3,332,398	3,286,824	3,196,806	2,762,637	2,762,409	2,647,077	2,599,861	-28.2%
Professional and technical services	12,574,226	12,019,711	12,379,139	12,658,974	13,261,975	14,012,675	14,570,987	13,852,779	14,075,700	11.9%
Management of companies and enterprises	6,928,554	7,116,947	7,920,067	7,435,349	7,734,812	8,631,185	9,606,157	7,837,009	8,477,648	22.4%
Administrative and waste services	4,515,183	4,850,545	4,954,820	5,103,036	5,253,951	5,290,097	5,165,480	4,665,295	5,067,911	12.2%
Educational services	1,571,527	1,906,623	1,988,927	1,971,168	2,077,897	2,177,007	2,303,055	2,391,933	2,484,446	58.1%
Health care and social assistance	14,558,939	17,531,340	18,282,155	18,451,879	19,352,696	20,124,166	20,658,127	21,415,663	21,772,350	49.5%
Arts, entertainment, and recreation	1,414,277	1,693,582	1,718,424	1,685,881	1,855,564	1,891,111	1,875,848	1,782,434	1,926,611	36.2%
Accommodation and food services	3,686,328	3,970,313	4,102,179	4,068,816	4,067,844	4,224,801	4,035,615	3,880,683	3,968,036	7.6%
Other services, except public administration	6,020,133	6,153,130	6,235,911	6,300,149	6,241,445	6,238,249	5,962,842	5,771,733	5,753,152	-4.4%
Government and government enterprises	20,824,055	22,706,572	22,950,183	23,167,304	23,419,819	23,678,472	24,347,214	24,761,872	24,623,956	18.2%
Total	**159,177,970**	**167,434,623**	**172,643,242**	**172,433,516**	**173,409,048**	**175,306,522**	**177,211,377**	**167,064,903**	**170,538,736**	**7.1%**

APPENDIX C: ADDITIONAL COMMUNITY REINVESTMENT ACT DATA

Additional data tables related to the Community Reinvestment Act (CRA) data are presented on the following pages.

Table C.1
Small Business Loans Originated with Loan Amount of $100,000 or Less
State of Minnesota
Community Reinvestment Act Data

Census Tract by MFI	2006		2007		2008		2009		Total	
	Number of Loans	Loan Amount (1,000s)	Number of Loans	Loan Amount (1,000s)	Number of Loans	Loan Amount (1,000s)	Number of Loans	Loan Amount (1,000s)	Number of Loans	Loan Amount (1,000s)
<50% MFI	775	12,259	818	13,478	684	11,586	462	9,276	2,739	46,599
50.1-80% MFI	7,209	86,759	7,743	91,115	6,246	79,527	3,188	54,319	24,386	311,720
80.1-120% MFI	74,449	897,879	87,066	1,041,723	68,219	857,648	35,108	556,643	264,842	3,353,893
>120% MFI	21,398	262,400	25,373	321,743	20,763	270,799	11,477	178,509	79,011	1,033,451
Total	**103,831**	**1,259,297**	**121,000**	**1,468,059**	**95,912**	**1,219,560**	**50,235**	**798,747**	**370,978**	**4,745,663**

Table C.2
Small Business Loans Originated with Loan Amount Between $100,001 and $250,000
State of Minnesota
Community Reinvestment Act Data

Census Tract by MFI	2006		2007		2008		2009		Total	
	Number of Loans	Loan Amount (1,000s)	Number of Loans	Loan Amount (1,000s)	Number of Loans	Loan Amount (1,000s)	Number of Loans	Loan Amount (1,000s)	Number of Loans	Loan Amount (1,000s)
<50% MFI	32	6,038	20	3,661	40	7,002	20	3,621	112	20,322
50.1-80% MFI	170	29,818	149	26,689	170	29,966	143	25,374	632	111,847
80.1-120% MFI	1,432	251,079	1,631	283,841	1,592	275,352	1,234	215,015	5,889	1,025,287
>120% MFI	358	63,769	378	67,460	354	62,728	234	41,514	1,324	235,471
Total	**1,992**	**350,704**	**2,178**	**381,651**	**2,156**	**375,048**	**1,631**	**285,524**	**7,957**	**1,392,927**

Table C.3
Small Business Loans Originated with Loan Amount Above $250,000
State of Minnesota
Community Reinvestment Act Data

Census Tract by MFI	2006		2007		2008		2009		Total	
	Number of Loans	Loan Amount (1,000s)	Number of Loans	Loan Amount (1,000s)	Number of Loans	Loan Amount (1,000s)	Number of Loans	Loan Amount (1,000s)	Number of Loans	Loan Amount (1,000s)
<50% MFI	36	17,769	35	16,812	29	15,346	20	10,160	120	60,087
50.1-80% MFI	164	94,094	161	89,578	154	86,267	125	69,938	604	339,877
80.1-120% MFI	1,441	778,928	1,608	862,306	1,694	921,550	1,252	692,379	5,995	3,255,163
>120% MFI	322	177,608	345	189,521	383	216,512	282	155,375	1,332	739,016
Total	**1,963**	**1,068,399**	**2,149**	**1,158,217**	**2,260**	**1,239,675**	**1,679**	**927,852**	**8,051**	**4,394,143**

Table C.4
Small Business Loans to Businesses with Gross Annual Revenues Less Than $1 Million
State of Minnesota
Community Reinvestment Act Data

Census Tract by MFI	2006		2007		2008		2009		Total	
	Number of Loans	Loan Amount (1,000s)	Number of Loans	Loan Amount (1,000s)	Number of Loans	Loan Amount (1,000s)	Number of Loans	Loan Amount (1,000s)	Number of Loans	Loan Amount (1,000s)
<50% MFI	390	12,285	417	13,094	321	10,442	207	6,706	1,335	42,527
50.1-80% MFI	3,537	85,602	3,721	91,868	2,921	84,767	1,584	56,935	11,763	319,172
80.1-120% MFI	37,915	853,579	43,075	968,248	32,418	842,392	18,678	595,808	132,086	3,260,027
>120% MFI	10,916	241,707	12,699	283,790	10,147	240,934	6,248	180,231	40,010	946,662
Total	**52,758**	**1,193,173**	**59,912**	**1,357,000**	**45,807**	**1,178,535**	**26,717**	**839,680**	**185,194**	**4,568,388**

APPENDIX D: ADDITIONAL HMDA DATA

The Home Mortgage Disclosure Act (HMDA) requires both depository and non-depository lenders to collect and publicly disclose information about housing-related loans and the applications for such loans.[88] Both types of lending institutions must meet a set of reporting criteria, as follows:

1. The institution must be a bank, credit union, or savings association;
2. The total assets must exceed the coverage threshold;[89]
3. The institution must have had a home or branch office in a Metropolitan Statistical Area (MSA);
4. The institution must have originated at least one home purchase loan or refinancing of a home purchase loan secured by a first lien on a one- to four-family dwelling;
5. The institution must be federally insured or regulated; and
6. 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 as follows:

1. The institution must be a for-profit organization;
2. 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;
3. 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 mortgages on property located in an MSA in the preceding calendar year; and
4. The institution must have assets exceeding $10 million or have originated 100 or more home purchases in the preceding calendar year.

HMDA data represent most mortgage lending activity and are thus the most comprehensive collection of information regarding home purchase originations, home remodel loan originations, and refinancing available.

The information presented in this section of the AI offers details pertaining to HMDA data as related to the State of Minnesota.

[88] Data are considered "raw" because they contain entry errors and incomplete loan applications. Starting in 2004, the HMDA data made substantive changes in reporting. It modified the way it handled Hispanic data, loan interest rates, and the reporting of multifamily loan applications.

[89] 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.

Table D.1
Owner-Occupied Home Purchase Loan Applications by Loan Type
State of Minnesota
HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	Total
Conventional	163,132	197,825	176,129	113,895	54,541	43,259	748,781
FHA - Insured	12,093	9,037	7,545	6,235	26,067	41,914	102,891
VA - Guaranteed	1,925	1,677	1,653	1,646	2,507	3,503	12,911
Rural Housing Service or Farm Service Agency	1,104	1,170	1,069	1,350	2,933	5,627	13,253
Total	**178,254**	**209,709**	**186,396**	**123,126**	**86,048**	**94,303**	**877,836**

Table D.2
Owner-Occupied Home Purchase Loan Applications by Selected Action Taken by Gender
State of Minnesota
HMDA Data

Gender		2004	2005	2006	2007	2008	2009	Total
Male	Originated	67,979	72,251	60,999	41,689	32,126	32,288	307,332
	Denied	9,179	12,237	11,993	7,949	4,935	4,093	50,386
	Denial Rate %	11.9%	14.5%	16.4%	16.0%	13.3%	11.3%	14.1%
Female	Originated	30,478	34,342	29,766	19,270	15,286	16,877	146,019
	Denied	4,940	6,948	6,931	4,303	2,637	2,249	28,008
	Denial Rate %	13.9%	16.8%	18.9%	18.3%	14.7%	11.8%	16.1%
Not Available	Originated	2,834	3,497	3,254	2,184	1,454	1,467	14,690
	Denied	1,033	1,177	1,105	805	484	331	4,935
	Denial Rate %	26.7%	25.2%	25.3%	26.9%	25.0%	18.4%	25.1%
Not Applicable	Originated	25	20	40	29	11	14	139
	Denied	1	10	3	7	2	2	25
	Denial Rate %	3.8%	33.3%	7.0%	19.4%	15.4%	12.5%	15.2%
Total	Originated	101,316	110,110	94,059	63,172	48,877	50,646	468,180
	Denied	15,153	20,372	20,032	13,064	8,058	6,675	83,354
	Denial Rate %	**13.0%**	**15.6%**	**17.6%**	**17.1%**	**14.2%**	**11.6%**	**15.1%**

Table D.3
Owner-Occupied Home Purchase Loan Applications by Selected Action Taken by Race and Ethnicity
State of Minnesota
HMDA Data

Race		2004	2005	2006	2007	2008	2009	Total
American Indian or Alaskan Native	Originated	512	512	443	295	219	219	2,200
	Denied	147	171	147	155	74	60	754
	Denial Rate %	22.3%	25.0%	24.9%	34.4%	25.3%	21.5%	25.5%
Asian	Originated	4,517	5,384	4,545	2,557	2,056	2,282	21,341
	Denied	1,001	1,690	1,680	1,066	541	429	6,407
	Denial Rate %	18.1%	23.9%	27.0%	29.4%	20.8%	15.8%	23.1%
Black	Originated	3,138	4,821	4,281	1,936	1,025	1,240	16,441
	Denied	1,004	2,117	2,620	1,555	509	312	8,117
	Denial Rate %	24.2%	30.5%	38.0%	44.5%	33.2%	20.1%	33.1%
White	Originated	86,090	91,672	78,284	54,375	42,941	44,285	397,647
	Denied	10,684	13,587	13,174	8,771	6,132	5,315	57,663
	Denial Rate %	11.0%	12.9%	14.4%	13.9%	12.5%	10.7%	12.7%
Not Available	Originated	6,880	7,703	6,454	3,986	2,627	2,610	30,260
	Denied	2,273	2,802	2,409	1,512	801	558	10,355
	Denial Rate %	24.8%	26.7%	27.2%	27.5%	23.4%	17.6%	25.5%
Not Applicable	Originated	179	18	52	23	9	10	291
	Denied	44	5	2	5	1	1	58
	Denial Rate %	19.7%	21.7%	3.7%	17.9%	10.0%	9.1%	16.6%
Total	Originated	101,316	110,110	94,059	63,172	48,877	50,646	468,180
	Denied	15,153	20,372	20,032	13,064	8,058	6,675	83,354
	Denial Rate %	**13.0%**	**15.6%**	**17.6%**	**17.1%**	**14.2%**	**11.6%**	**15.1%**
Hispanic (Ethnicity)	Originated	3,139	4,076	3,366	1,695	1,071	1,056	14,403
	Denied	953	1,594	1,676	1,014	453	286	5,976
	Denial Rate %	23.3%	28.1%	33.2%	37.4%	29.7%	21.3%	29.3%

Table D.4
Owner-Occupied Home Purchase Loan Applications by Reason for Denial by Race and Ethnicity
State of Minnesota
HMDA Data, 2004 - 2009

Denial Reason	American Indian or Alaskan Native	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Credit History	199	978	1,702	11,708	1,831	14	16,432	1,233
Debt-to-Income Ratio	86	863	971	8,231	1,171	6	11,328	655
Credit Application Incomplete	51	689	687	5,411	815	6	7,659	695
Collateral	51	530	535	5,432	663	5	7,216	371
Unverifiable Information	38	568	547	2,955	462	8	4,578	500
Employment History	16	191	123	1,361	181	2	1,874	118
Insufficient Cash	15	101	105	1,056	180	1	1,458	91
Mortgage Insurance Denied	1	8	16	74	5	0	104	13
Other	93	1,155	1,357	9,029	1,858	11	13,503	933
Missing	204	1,324	2,074	12,406	3,189	5	19,202	1,367
Total	**754**	**6,407**	**8,117**	**57,663**	**10,355**	**58**	**83,354**	**5,976**
% Missing	27.1%	20.7%	25.6%	21.5%	30.8%	8.6%	23.0%	22.9%

Table D.5
Owner-Occupied Home Purchase Loan Applications by Income: Originated and Denied
State of Minnesota
HMDA Data

Income		2004	2005	2006	2007	2008	2009	Total
$15,000 or Less	Loan Originated	466	319	539	169	191	160	1,844
	Application Denied	317	317	226	206	179	247	1,492
	Denial Rate %	40.5%	49.8%	29.5%	54.9%	48.4%	60.7%	44.7%
$15,001 to $30,000	Loan Originated	6,986	6,172	4,680	3,819	3,085	4,659	29,401
	Application Denied	2,228	2,482	1,904	1,502	1,250	1,308	10,674
	Denial Rate %	24.2%	28.7%	28.9%	28.2%	28.8%	21.9%	26.6%
$30,001 to $45,000	Loan Originated	20,676	19,931	14,694	10,693	9,418	12,134	87,546
	Application Denied	3,596	4,240	3,438	2,312	1,874	1,711	17,171
	Denial Rate %	14.8%	17.5%	19.0%	17.8%	16.6%	12.4%	16.4%
$45,001 to $60,000	Loan Originated	22,392	24,716	19,509	12,270	9,608	10,285	98,780
	Application Denied	3,403	4,811	4,294	2,645	1,608	1,204	17,965
	Denial Rate %	13.2%	16.3%	18.0%	17.7%	14.3%	10.5%	15.4%
$60,001 to $75,000	Loan Originated	15,773	17,699	15,243	9,733	7,089	6,640	72,177
	Application Denied	1,788	2,757	3,041	1,789	996	698	11,069
	Denial Rate %	10.2%	13.5%	16.6%	15.5%	12.3%	9.5%	13.3%
More than $75,000	Loan Originated	31,915	38,098	36,099	25,018	18,653	15,915	165,698
	Application Denied	3,030	4,925	6,151	4,136	2,001	1,376	21,619
	Denial Rate %	8.7%	11.4%	14.6%	14.2%	9.7%	8.0%	11.5%
Data Missing	Loan Originated	3,108	3,175	3,295	1,470	833	853	12,734
	Application Denied	791	840	978	474	150	131	3,364
	Denial Rate %	20.3%	20.9%	22.9%	24.4%	15.3%	13.3%	20.9%
Total	Loan Originated	101,316	110,110	94,059	63,172	48,877	50,646	468,180
	Application Denied	15,153	20,372	20,032	13,064	8,058	6,675	83,354
	Denial Rate %	**13.0%**	**15.6%**	**17.6%**	**17.1%**	**14.2%**	**11.6%**	**15.1%**

Table D.6
Owner-Occupied Home Purchase Loan Applications by Income By Race and Ethnicity: Originated and Denied
State of Minnesota
HMDA Data, 2004 - 2009

Race		<= $15K	$15,001-$30K	$30,001-$45K	$45,001-$60K	$60,001-$75K	> $75K	Data Missing	Total
American Indian or Alaskan Native	Loan Originated	10	169	486	530	298	655	52	2,200
	Application Denied	28	136	178	156	85	149	22	754
	Denial Rate %	73.7%	44.6%	26.8%	22.7%	22.2%	18.5%	29.7%	25.5%
Asian	Loan Originated	43	817	3,019	4,833	3,724	8,081	824	21,341
	Application Denied	46	424	925	1,468	1,037	2,191	316	6,407
	Denial Rate %	51.7%	34.2%	23.5%	23.3%	21.8%	21.3%	27.7%	23.1%
Black	Loan Originated	33	596	2,987	4,670	3,157	4,593	405	16,441
	Application Denied	54	543	1,424	2,067	1,448	2,353	228	8,117
	Denial Rate %	62.1%	47.7%	32.3%	30.7%	31.4%	33.9%	36.0%	33.1%
White	Loan Originated	1,438	26,482	76,247	82,678	60,333	139,970	10,499	397,647
	Application Denied	1,161	8,304	12,627	12,169	7,145	14,185	2,072	57,663
	Denial Rate %	44.7%	23.9%	14.2%	12.8%	10.6%	9.2%	16.5%	12.7%
Not Available	Loan Originated	320	1,320	4,770	6,031	4,633	12,320	866	30,260
	Application Denied	203	1,254	2,009	2,092	1,352	2,732	713	10,355
	Denial Rate %	38.8%	48.7%	29.6%	25.8%	22.6%	18.2%	45.2%	25.5%
Not Applicable	Loan Originated	0	17	37	38	32	79	88	291
	Application Denied	0	13	8	13	2	9	13	58
	Denial Rate %	.	43.3%	17.8%	25.5%	5.9%	10.2%	12.9%	16.6%
Total	Loan Originated	1,844	29,401	87,546	98,780	72,177	165,698	12,734	468,180
	Application Denied	1,492	10,674	17,171	17,965	11,069	21,619	3,364	83,354
	Denial Rate %	**44.7%**	**26.6%**	**16.4%**	**15.4%**	**13.3%**	**11.5%**	**20.9%**	**15.1%**
Hispanic (Ethnicity)	Loan Originated	43	1,024	2,990	4,493	2,376	3,088	389	14,403
	Application Denied	77	704	1,363	1,788	962	932	150	5,976
	Denial Rate %	64.2%	40.7%	31.3%	28.5%	28.8%	23.2%	27.8%	29.3%

Table D.7
Percent Denial Rates by Income by White Applicants
State of Minnesota
HMDA Data

Income	2004	2005	2006	2007	2008	2009	Total
<= $15K	40.5%	45.5%	35.4%	51.6%	45.2%	57.6%	44.7%
$15,001- $30K	21.4%	25.1%	25.7%	25.8%	26.6%	20.0%	23.9%
$30,001- $45K	12.7%	14.8%	16.4%	15.5%	14.5%	11.5%	14.2%
$45,001- $60K	10.9%	13.5%	14.6%	14.7%	12.7%	9.8%	12.8%
$60,001- $75K	8.3%	10.6%	13.1%	11.8%	10.4%	8.6%	10.6%
Above $75K	7.4%	9.1%	11.4%	10.4%	8.4%	7.4%	9.2%
Data Missing	15.4%	17.2%	17.8%	19.0%	13.4%	10.9%	16.5%
Total	**11.0%**	**12.9%**	**14.4%**	**13.9%**	**12.5%**	**10.7%**	**12.7%**

Table D.8
Percent Denial Rates by Income by Black Applicants
State of Minnesota
HMDA Data

Income	2004	2005	2006	2007	2008	2009	Total
<= $15K	73.3%	72.7%	40.0%	72.7%	80.0%	70.0%	62.1%
$15,001- $30K	46.4%	55.6%	58.1%	49.6%	46.7%	31.0%	47.7%
$30,001- $45K	27.6%	33.3%	39.8%	38.2%	33.4%	18.8%	32.3%
$45,001- $60K	22.0%	28.7%	36.5%	41.6%	32.0%	14.6%	30.7%
$60,001- $75K	18.3%	29.0%	35.6%	43.8%	30.7%	16.6%	31.4%
Above $75K	21.7%	28.1%	37.9%	49.2%	30.7%	21.4%	33.9%
Data Missing	28.7%	34.6%	40.5%	41.7%	29.0%	22.2%	36.0%
Total	**24.2%**	**30.5%**	**38.0%**	**44.5%**	**33.2%**	**20.1%**	**33.1%**

Table D.9
Originated Owner-Occupied Loans by Loan Purpose by Predatory Status
State of Minnesota
HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	Total
Home Purchase	Other Originated	90,617	84,226	72,366	56,526	45,584	48,496	397,815
	High APR Loan	10,699	25,884	21,693	6,646	3,293	2,150	70,365
	Percent High APR	10.6%	23.5%	23.1%	10.5%	6.7%	4.2%	15.0%
Home Improvement	Other Originated	16,703	16,273	17,261	14,982	9,654	6,571	81,444
	High APR Loan	2,418	2,768	2,983	2,336	1,641	951	13,097
	Percent High APR	12.6%	14.5%	14.7%	13.5%	14.5%	12.6%	13.9%
Refinancing	Other Originated	120,015	94,122	67,948	60,813	52,112	120,454	515,464
	High APR Loan	20,137	30,941	28,266	14,514	6,497	4,664	105,019
	Percent High APR	14.4%	24.7%	29.4%	19.3%	11.1%	3.7%	16.9%
Total	Other Originated	227,335	194,621	157,575	132,321	107,350	175,521	994,723
	High APR Loan	33,254	59,593	52,942	23,496	11,431	7,765	188,481
	Percent High APR	**12.8%**	**23.4%**	**25.1%**	**15.1%**	**9.6%**	**4.2%**	**15.9%**

Table D.10
Owner-Occupied Home Purchase Predatory Loans Originated by Race and Ethnicity
State of Minnesota
HMDA Data

Race	2004	2005	2006	2007	2008	2009	Total
American Indian	149	230	193	53	35	25	685
Asian	564	1,878	1,544	412	106	75	4,579
Black	886	2,938	2,630	701	122	69	7,346
White	8,123	18,003	15,506	5,076	2,877	1,900	51,485
Not Applicable	965	2,831	1,816	402	151	79	6,244
No Co-Applicant	12	4	4	2	2	2	26
Total	**10,699**	**25,884**	**21,693**	**6,646**	**3,293**	**2,150**	**70,365**
Hispanic (Ethnicity)	723	1,847	1,720	442	140	62	4,934

Table D.11
Originated Owner-Occupied Home Purchase Loans by Race and Ethnicity by Predatory Status
State of Minnesota
HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	Total
American Indian	Other Originated	363	282	250	242	184	194	1,515
	High APR Loan	149	230	193	53	35	25	685
	Percent High APR	29.1%	44.9%	43.6%	18.0%	16.0%	11.4%	31.1%
Asian	Other Originated	3,953	3,506	3,001	2,145	1,950	2,207	16,762
	High APR Loan	564	1,878	1,544	412	106	75	4,579
	Percent High APR	12.5%	34.9%	34.0%	16.1%	5.2%	3.3%	21.5%
Black	Other Originated	2,252	1,883	1,651	1,235	903	1,171	9,095
	High APR Loan	886	2,938	2,630	701	122	69	7,346
	Percent High APR	28.2%	60.9%	61.4%	36.2%	11.9%	5.6%	44.7%
White	Other Originated	77,967	73,669	62,778	49,299	40,064	42,385	346,162
	High APR Loan	8,123	18,003	15,506	5,076	2,877	1,900	51,485
	Percent High APR	9.4%	19.6%	19.8%	9.3%	6.7%	4.3%	12.9%
Not Applicable	Other Originated	5,915	4,872	4,638	3,584	2,476	2,531	24,016
	High APR Loan	965	2,831	1,816	402	151	79	6,244
	Percent High APR	14.0%	36.8%	28.1%	10.1%	5.7%	3.0%	20.6%
No Co-Applicant	Other Originated	167	14	48	21	7	8	265
	High APR Loan	12	4	4	2	2	2	26
	Percent High APR	6.7%	22.2%	7.7%	8.7%	22.2%	20.0%	8.9%
Total	Other Originated	90,617	84,226	72,366	56,526	45,584	48,496	397,815
	High APR Loan	10,699	25,884	21,693	6,646	3,293	2,150	70,365
	Percent High APR	**10.6%**	**23.5%**	**23.1%**	**10.5%**	**6.7%**	**4.2%**	**15.0%**
Hispanic (Ethnicity)	Other Originated	2,416	2,229	1,646	1,253	931	994	9,469
	High APR Loan	723	1,847	1,720	442	140	62	4,934
	Percent High APR	23.0%	45.3%	51.1%	26.1%	13.1%	5.9%	34.3%

Table D.12
Originated Owner-Occupied Home Purchase Loans by Income by Predatory Status
State of Minnesota
HMDA Data

Income		2004	2005	2006	2007	2008	2009	Total
$15,000 or Less	Other Originated	385	232	461	132	162	122	1,494
	High APR Loan	81	87	78	37	29	38	350
	Percent High APR	17.4%	27.3%	14.5%	21.9%	15.2%	23.8%	19.0%
$15,001 to $30,000	Other Originated	6,003	4,568	3,430	3,106	2,610	4,340	24,057
	High APR Loan	983	1,604	1,250	713	475	319	5,344
	Percent High APR	14.1%	26.0%	26.7%	18.7%	15.4%	6.8%	18.2%
$30,001 to $45,000	Other Originated	18,266	14,614	11,304	9,515	8,594	11,549	73,842
	High APR Loan	2,410	5,317	3,390	1,178	824	585	13,704
	Percent High APR	11.7%	26.7%	23.1%	11.0%	8.7%	4.8%	15.7%
$45,001 to $60,000	Other Originated	19,433	17,221	14,351	10,900	8,957	9,899	80,761
	High APR Loan	2,959	7,495	5,158	1,370	651	386	18,019
	Percent High APR	13.2%	30.3%	26.4%	11.2%	6.8%	3.8%	18.2%
$60,001 to $75,000	Other Originated	13,943	13,254	11,334	8,702	6,668	6,399	60,300
	High APR Loan	1,830	4,445	3,909	1,031	421	241	11,877
	Percent High APR	11.6%	25.1%	25.6%	10.6%	5.9%	3.6%	16.5%
More than $75,000	Other Originated	29,662	31,707	29,338	23,051	17,782	15,358	146,898
	High APR Loan	2,253	6,391	6,761	1,967	871	557	18,800
	Percent High APR	7.1%	16.8%	18.7%	7.9%	4.7%	3.5%	11.3%
Data Missing	Other Originated	2,925	2,630	2,148	1,120	811	829	10,463
	High APR Loan	183	545	1,147	350	22	24	2,271
	Percent High APR	5.9%	17.2%	34.8%	23.8%	2.6%	2.8%	17.8%
Total	Other Originated	90,617	84,226	72,366	56,526	45,584	48,496	397,815
	High APR Loan	10,699	25,884	21,693	6,646	3,293	2,150	70,365
	Percent High APR	**10.6%**	**23.5%**	**23.1%**	**10.5%**	**6.7%**	**4.2%**	**15.0%**

Table E.1
Are you aware of any questionable practices or barriers to fair housing choice in the rental housing market?
State of Minnesota
2011 Fair Housing Survey Data

Comments
-I just think there are ways to get around the laws - so there is discrimination going on, but awfully hard to prove.... someone shows up with kids or not dressed well or of a different race and suddenly they are told that it's already been rented.... someone may call and have an accent or a name that the owner discriminates against and ove rth ephoen you are told there is no available apt.
"Market Rate" is in no way relevant to most people's actual wages...the main barriers is income, or lack thereof. Banks are rich off the interest on mortgages, while homeowners property taxes are one of the few things propping up our communities' essential services.
A persons criminal background. Many battered women are forced to partake in crimes for fear of injury if they don't.
Although I don't think it is that uncommon.
American Indians have had difficulty in renting units in the towns of Thief River Falls and Bemidji, MN becasue of their race.
An couple we know were denied rent because she was Native American.
anti-section 8 condominium associations in Eagan,MN 55123
Apartment Owners being unwilling to rent to certain "types" of people. No advertising, no open access.
Bait and switch tactics when a minority person applies.
client burning sage was kicked out of apartment due to being accused of smoking THC
Credit checks, past criminal history
criminal background, credit history, employment status, race, ethnicity.
criminal history
Criminal history, income type, race, credit history
Denial of affordable housing to persons with mental illness.
Difficult to use "fair" practices when eviction rules laws favor tenants - this discourages fair practices
Discrimination occurs regularly based on pre-convienced notions of race and behavior
economic status, being on MFIP, low income, race and gender
Failure to advertise rental housing available in surburban non concentrated markets to attract people of color from the inner city.
failure to make accommodaitons for people with disabilities, refusal to rent to people of color, unequal enforcment of rules against people of color, sexual hrassment of women, refusal to rent to people with public assistance
Familial status-families with children
I have heard of people refusing to rent based on color, race, national origin, disability, and familial status.
I know that I can more easily place a white family in housing than an African American one.
I know that it is more difficult for my African American clients to find housing in my small Mn town (pop. approx 16,000)
I often hear from families that they feel that when their race/homeless status is discovered that landlords deny them or say that it's already taken. This is difficult to prove, but it is a common theme among our work with homeless families.
I think single moms are still discriminated agaisnt when it comes to occupancy limits. Also, people w/ mental health issues are often treated unfairly when it comes to companion animals and landlords scoff at the idea of companion animials.
I work with convicted felons who have a more difficult time finding rental properties that will allow them to reside there.
In this community there are some landlords who do not respond to inquiries about vacancies from persons they perceive to be persons of color or who appear to be recent immigrants and some who impose different standards for admission and eviction for those households. There are also a number of landlords who do not comply with the requirements for reasonable accommodations with regard to service animals.
Income Race
It is my understanding that there is not enough housing available in outstate MN that would fit for a fair housing choice
Know of landlords who won't rent to Natives or Blacks.
lack of affordable housing from which to choose
Lack of affordable rental housing

lack of safe, decent and affordable rental units, lack of employment/living wages to maintain housing, and of course the descrimination due to race, marital status, disabilities Also when a persons credit score is poor or if they have legal issues

Landlords in our part of the state do not seem well versed on fair housing. Many renters are also unaware. Renters are often turned away because they have children and in some cases because they rely on public assistance.

Landlords sometimes work to exclude people with assistance dogs.

Landlords who require 2x the rent or higher income, as well as landlords who refues to rent to clients with any criminal history, or any felonies, no matter how old the charges are, are creating barriers to people finding housing at all.

Limited knowledge to VAWA

LLs discriminate based on race, ethnicity, and language.

Many neighborhoods don't want renters, in large part because of their (perceived) age though race seems to be a factor as well.

most rental housing is not wheelchair accessible very few large family rentals (3+ bdrm)

No one systematically moniters the market so landlords are free to act withour concern for laws..

Non-english speakers are discriminated against. People of color are discriminated against. Large families are discriminated against.

not enough affordable rental units. landlords "cherry pick" and often will not rent to people on public assistance or of another culture.

Not that they would admit.

occasional discrimination due to race

People are frequently discriminated against in this area because of the fact they are receiving public assistance and/or housing subsidy.

People of very low income qualify for housing. There is a GAP where people don't qualify but yet do not have the financial means to continue to adequately live in their own homes.

people that rent out a house or two seem to have less knowledge about fair housing laws and they feel that they don't pertain to them.

people with felony ofter are refused rental housing even tho their felony does not effect the location

Persons with criminal records have a hard time finding housing. I don't think is protected status, nor do I know if it should be.

physical barrers for mobility impaired, lack of supportive housing for mentally ill

predominantly "white" areas of rural MN are likely to have practices based on race and religion

Properties available when a white person calls but not when a person of color calls.

Race

Refusal to rent to refugees based on national origin, perceptions of "terrorism", income constraints.

refusal to rental of single women with children refusal to rental of women with teen children refusal to rental to women of color refusal to rental to women on MFIP

refused pets

refusing to rent as person has no job or on SSI disability or have more than 1-2 kids etc.

Refusing to rent based on criminal history

refusing to rent based on income, particularly if receiving Social Security

Refusing to rent based on race

Refusing to rent to Hispanic, Samili in our area.

refusing to rent to people who have a prescription for a companion animal

Rental housing discriinates against folks who use Section 8. Landlords increase rent just over income limits so they do not have to take Section 8.

Rental property owners opting not to use leases in cases where the household has limited English proficiency. This makes everything subjective with the landlord.

Section 8 discrimination

Small "mom and pop" landlords are not aware or familiar with all the fair housing laws. Because they might only have one or two rental properties, they can be discriminatory without using the "exact" reason of why they won't rent to a particular individual or family.

Some landlords can discriminate because of the number of units that they own. Also, some will refuse to make proper repairs.

Some landlords will not rent to large immigrant families as previous experience with this group was not favorable. We have funded a training program for this group to learn to be lease compliant, we now have to get property owners to give them a second chance.

Somel landlords often won't rent to "those" people, the unit is not available when "those" people call inquiring and yet is listed in the rental section the next week in the paper.

Tenants are often not willing or able to follow through with a discrimination claim themselves. They just need to find adequate housing on their timeline.

The barriers are regards to income level and medical issues.

The barriers often exist without being blatant. Policies are intentionally vague or not written, so decisions made are often unfair.

The individual prejudices of landlords and property managers could be hidden in decisions separate from obvious discrimination.

The state selectively enforces its own laws by permitting developments exclusively for one sex or the other sex, discriminating against families that have both a male and female head of household in the same unit, developments that do not serve single fathers, and permitting culturally specific developments the discourage members of other races or ethnic groups from appling to those developments.

There are older landlords that may be discriminating against people of color.

There is a disconnect between the landlords who are trying to protect their livelihoods and people who need permanent housing. Yes we need fair labor laws, tenants rights laws seem to favor the landlord, however; how do we educate the tenant on how to be a good tenant? Landlords want people in their buildings that will respect their property and not bring criminal activity into the community. How to we equalize the fair housing laws and protect the landlord and the community?

there is not enough rental assistance available for the people who need it.

There is often subtle discrimination based on race or ethnicity (accent of applicant on phone, caller ID) and family size (larger numbers of kids). There are also barriers for ex-felons that do not always make sense.

undocumented persons

we have a high Native American population in our area and it is pretty well known that there are landlords who absolutely refuse to rent to them

we live close to an American Indian Reservation and it can be difficult for families to find housing.

We still run into landlords that subtley discriminate on the basis of race/color, disability and familial status. They are smart enought not to say that is the basis for denial or negative action, but it is likely the underlying motivation.

When a pet is 'needed' for emotional functioning, there are often no housing options for a person.

Table E.2
Are you aware of any questionable practices or barriers to fair housing choice in the real estate market?
State of Minnesota
2011 Fair Housing Survey Data

Comments
Although I don't think it is that uncommon.
Apartment Owners being unwilling to rent to certain "types" of people. No advertising, no open access. Very difficult to rent if had a police record.
Banks are rich off the interest on mortgages,
Exclusionary practice and policies.
gentrification
I have been "guided" to certain areas with families that have multiple children or redirected
I've heard of people not being able to rent or buy in certain neighborhoods based on their race.
If you don't have any children there are far less housing options/opportunities available!
Just look at the home mortgage mess created in part by industry and governmant trying to get people who are too poor to afford ownership in the short and mid-term,
man with families
Not helping distressed people when they were a victim of fraud or health issues due to uncontrolable causes as cancer is some believe.
Not showing certain houses to minority persons.
Occasionally HUD policy does create an opportunity for misguided policies. They also rarely give solid advice - only, you MIGHT want to look at...
One of my friends was steered to a neighborhood that he wasn't interested in.
Only showing properties to families without children.
Percieved areas of interest defined by agents.
racial steering
Realtors trying to keep exclusive areas exclusive, based on wishes of their clients
Showing different races different areas
Showing people of color only certain neighborhoods
The industry also knows how to help owners avoid some fair housing issues by incouraging them not to advertise.
There are landlords in this town Bemidji will not rent to people that do not have a job or have a section 8 voucher or are felons.
There is discrimination going on, but awfully hard to prove.... someone shows up with kids or not dressed well or of a different race and suddenly they are told they can't get a loan.
There is steering of white and black people into different neighborhoods.
This could be because os room count & square footage as well.
Trade associations do not educate landlords and managers.

Table E.3
Are you aware of any questionable practices or barriers to fair housing choice in the mortgage and home lending industry?
State of Minnesota
2011 Fair Housing Survey Data

Comments
Banks are rich off the interest on mortgages, while they foreclose on properties, sit on them, and demolish them while thosands of people are homeless. The influx of former homeowners into the rental market has pushed low income people into worse and worse conditions.
Banks claim to have trouble arranging mortgages on the Fond du Lac reservation, which makes it hard for band members to own homes.
Difficulty getting loans on tribal lands.
Discrimination to single women by women lenders -west central area of mn
Generally the discrimination is based on ignorance by the consumer who does not know the alternative financing that is available. A sucker is born every minuet, unfortunately low income people tend not to have the business expience to deal with the business world when it comes to this type of financial .
Higher interests rates in general for people whoms incomes are less or single persons (yes especially women) I took a Home Buyer workshop would've made me elidgible for 'first time homebuyer loan' - I was not provided and in fact was denied access to the program. Noone could tell me why.
Higher rates in certain parts of the city, ie North Mpls, higher rates to certain populations, ie Hispanic
I don't know about higher interest rates but I can speak to trying to sell a mortgage or a home to a woman beyond her income means. Helping her to falsify documents to qualify her for a loan for a home beyond her means.
I have heard of this in Minnesota with African Americans
I heard on MPR that people of color were more likely than white people to be offered expensive mortgage packages even if their financial situations were identical.
I know of studies that suggested predatory loans in the mortgage industry were targeted to families of color
I see the 0% interest loans charge much higher fees and rates for Muslim clients. Also, some lenders may choose a higher interest loan for those that may not understand English as well.
I was discrimated by X employer because I alert authories of there fraud. So they took away my electric equipment I needed, electric stapler and automatic hole punch in which I used to relieve some stress on only arm I had use of, other arm is paralyzed. This employer continued to violate the code of professional ethics until my only arm started to give me problems. Then I was terminated while I was on medical leave, just before I had to have surgery on it . This way they could and did terminate my shares and stock I earned over the 14 years I worked their. So I lost my income and anyway I could earn it.Then MERS, Countrywide foreclosed on me even when an underwriter was going to help me refinance. But instead left me a voice message saying he couldn't help me because I didn't own my house anymore because I was in foreclosure. I had over $80,000 in equity.I tried some banks and many lenders and even to tried first loan company I had through a government program with FMHA which they said my house was not a subsidized home anymore and I didn't qualify because of foreclosure. Now the only lender I found to help me redeem my home I can't find a lawyer to help me fight for my home back because he has used them to foreclose on other people he scamed out of there money and house.
I'm not sure who they are loaning money to because I can't refinance my house nor can my friends.
Immigration status
It is more difficult to qualify for a loan if you are a woman or a minority
It is often the case that modifications for mortgages are more beneficial to men rather than women. Often the women have to vacate the home rather than stay in the home after a divorce or the vacating of a significant other. However this may also be due to their income levels.
Just look at the home mortgage mess created in part by industry and governmant trying to get people who are too poor to afford ownership in the short and mid-term,
Many people not being aware of the mortgage are taken advantage of when it comes to loans and interest rates, if you are a first generation homeowner a lot of this is new and you can be easily taken advantage of.
mortgages and interest not conducive to Muslims
people of color get poor quality loans, people of color and new immigrants targeted for rent to own, mortgage repair and similar scams.
Places and race do play into interest rate assignments
Products are only available to highest wage earners with the best credit. Often leaving medium income mid level score persons (most of whom are of color) out of the opportunity to purchase homes.
recently when applying for a moratage after answering yes to single they went to a different screen on their computer
redlining and greenlining (subprime loans)
Right now the mortgage industry is happy to get any clients who quailfy.

Sticking it to middle income people (specifically white males) whose properties are underwater but banks won't negotiate lower interest rates at a time interest rates are at record lows.

Targeting poor communities with subprime loans, illegal inflation of housing values in those communities.

The lending of money and then being unable to refinance at a lower rate because of the plunging housing values especially those who have a mortgage over 125% of the current estimated market value of their home

There seems to be a significant amount of foreclosures- reports of high interest rates by certain mortage companies- intentionally loaning large amounts of money to those who are under qualified at a high rate of interest.

Think of all the families who were able to re-finance and re-finance or get financing for a home they truly couldn't afford... That's why we have seen so many foreclosures....

Table E.4
Are you aware of any questionable practices or barriers to fair housing choice in the housing construction or accessible housing design fields?

State of Minnesota
2011 Fair Housing Survey Data

Comments
all rentals need to be safer for those with disabilities
Approved house plans in new subdivision (built in partnership with City) are all split levels, which are either 1) inaccessible for people with physical disabilities or 2) highly expensive to modify for accessibility.
I do not know of any new rental housing built in this area in the past several years that is wheelchair accessable
In 1993 when I built home I was helped with some accommadation for one arm use only but now there are no programs to help with anything I need.
It remains difficult for persons with severe disabilities to find accessible housing.
many of my clients need no barrier enry to bldg, like no steps into bdg and elevator, even if not need full accessible like access at countertops etc.
many older facilities do not have/can't afford elevators
More accessible housing and government support of that housing
new construction places seem to be for the elderly or working and people in good standing , no felons or bad histories (rental or credit)
newer SF homes not wheelchair accessible
Not enough rental housing with handicap accessible units or accessibility
Not enough units with accessibility features
poor construction in general if the housing is to be rented or occupied by low-income/limited choice persons. I work in an assisted living facility for older adults and I find it to be implorable where they end up after having been productive,hardworking, homeowners
renovations that are not made accessible. units marketed at accessible, but not thoroughly accessible.
So many rental properties were built before rules regarding ramps and door openings were inacted.
Some newer rental units were not handicap accessible.
Sometimes the infrastructure issues, final use issues and cost issues make compliance difficult.
There are many older rental properties that do not have wheelchair accessibility. The rental properties also do not have elevators for people who have limited mobility or have wheelchairs/walkers etc.
There are too few rental units that are wheelchair/walker assessible!!!
Too often units that have build designed, build, or rehabed to be aavailable for disabled people do not market to that population. This is a huge waste.
We have seen a few instances of design errors - eg doors too narrow, bad curb cuts, etc.

Table E.5
Are you aware of any questionable practices or barriers to fair housing choice in the home insurance industry?
State of Minnesota
2011 Fair Housing Survey Data

Comments
Again, place matters.
Business insurance refusing to cover landlords who rent to convicted felons.
Don't know whole lot about how ins co operate. I do know that insurance rates arent based on insured desires. Example: My mortgage is only 125,000 yet I am required to insure at replacement cost of 300,000. Then my garage is another amount as are my personal property of course. I am paying over 1400.00 per year for insurance. That may not t sound like alot overall but when you only make 9.00 per hour with no opprtunity for advancement and there's the house payment, taxes, utilites and general upkeep of the home/investment
However, I know a lot of people whose insurance companies have been dropping them without providing a reason or corrective action, but I'm not aware of any disparities, so the companies at least seem to be screwing people over on an equal opportunity basis.
I am not so sure it is race as much as bias against areas with a lot of low income persons. The state permits the insurance industry to have rates by locations. When I moved from the inner city to the suburbs, my car insurance dropped significantly.
My premiums went up after foreclosure and is still increasing
no exact examples, but much suspicion of even higher insurance rates for racial differences after reviewing credit
Not just racial, homes in areas where many break-ins have occurred can have their policies cancelled.
Tenants are not marketed renters insurance.
Tornada in Buffalo Lake Minnesota hispanics were treated differently by insurance companies

Table E.6
Are you aware of any questionable practices or barriers to fair housing choice in the home appraisal industry?
State of Minnesota
2011 Fair Housing Survey Data

Comments
Although I don't think it is that uncommon.
Appraisers deliberately appraising homes in certain neighborhoods low due to perception of the neighborhood.
how an appraiser ueses forclosured properties to drive value this can destroy a neighborhood
I have seen several appraisals have had the appearances of some type of relining over the years
In small rural communities valuation is definetely based soley on the composition of the neighorhoods, but more bias on the socioeconomic than ethnic.
North Minneapolis--higher rates for houses when they get flipped
Not sure how appraisal is figured out but I'm sure the economic standard of the area and the area itself does determine the value. And then why are tax appraisals different than the home apprasial industry?
Place and neighborhood composition plays a role.
They definitely take the "neighborhood" into account when appraising a home. Not the homes but what the neighbors look like or if there is low income housing in the area.
This happens all around our country
This in structural. Homes in predominantly minority neighborhoods are often appraised for lower values. The question of whether that's BECAUSE they're predominantly minority neighborhoods is beside the point -- the effect is the same.
This industry works too closely with the realestate industry and because of the close relationship they are not an independent party and have used their position against the buyers and help the realestate market.
This is not framed as a "race" issue more of an economic issue but race ends up being the underlying factor
Went in my home without my authority and did not base it off houses like mine they used same as prior appraisal 6 years earlier and MN system to inquire if they are licensed is not accurate
Willmar mn

Table E.7
Are you aware of any questionable practices or barriers to fair housing choice in any other housing services?
State of Minnesota
2011 Fair Housing Survey Data

Comments
Accessability for people who don't speak Eng is limited.
Again townhome,condo. & building unit associations refusing Section 8 as a group and lotsa ads on Craigslist locally spelling this out.
Community Associations - rental practices, disability issues - access, reasonable accommodation, senior disability issues - mobility, access and some accommodations such as lighting, life safety and issues relating to dues payments and the lien and lien foreclosure procedures are sometimes abusive and may end up with units sold for unpaid association dues without a fair procedure, especially for senior with competency issues.
difficult when clients do not have great hosuing records and credit records and need apt, or need apt and services like assisted living services
FMHA program charged me more then I barrowed 8 years later and damaged my credit with false info,
history of chemical use and criminal charges
I have heard comments from HRA multiple persons saying they don't want 'those people' here (at least 3 people, and all of them in the 50+ age bracket). Some are towards recent immigrants with large families ('we can't serve them, it will be a lot of work without the support services. i.e. translators) but a lot...no most of it is towards blacks from out of state - especially Chicago but also the Twin Cities. I have even heard comments from the head of police (yes, in a room full of housing people) saying that there are young people in this town who just don't dress and act like they should(in rural MN with this specifically targeting blacks in that sentence). It is hard to live and work here.
I have heard that the Salvation Army will not allow gays to stay at their homeless shelter. The Salvation Army provides the only homeless shelter for men in our community.
Immigration status
limited housing available to felons highly competitive during time of year when colleges are in session, as students compete with alot of the same lower income housing that many of our clients are also looking for, especially families with children
mainstream lenders don't have enough people who speak languages other than English. Foreign language speakers (borrowers) are attracted to people who speak their language who turn out to be unscrupulous. lenders
Nursing homes and assisted living providers discriminating against people with mental health problems
Predatory rent-to-own/contract for deed scams that target the Latino population.
Restricting immigrants or people of a differnt race/culture on how to live-- for example specifically stating that "even though they do this back in their country all the time they cannot hang their clothing in their apartment to dry after washing them because it causes too much humidity in the building."
Section 42 housing & transitional housing is pathetic!
sobriety, level of independence
Some supportive housing and housing for low income persons has been developed with excludes single fathers, households with adult males and married couples. Some of the is has received government funding in violations of the states own laws.
Suportive housing that does not acknowledge residents as tenants
Supportive housing services. Help for those who have low incomes and are doing the jobs that nobody else wants to do, but can't get help because the waiting lists are too long and there is not enough availability of low income housing.
The barriers I'm aware of include difficulty locating housing for families if you have an unlawful detainer or criminal background. Some of the families involved with children's services experience difficulty in locating appropriate housing due to these items.
The treatment of families with Section 8 certificates and particularly families of color. The LL's try to do "character" checks that go beyond rental housing screenings. Their biases leak into the discussion and it has turned into advocacy when it was supposed to be a tenant check.
The waiting lists for programs that base rent on income are extremely long and ... A person/family who suddnely displaced and becomes homeless does not have 2-3 years to wait. Warehousing isn't the answer either, it points to/descriminates due to income... and increase in crimes in the area. If a community is to be exclusivly affordable there should be on site access to supports, services ,transportation... When a person drives by such a complex it shouldn"t be seen as a ghetto or the place that lesser people dwell. I understand the concept of mixed use but it doesn't seem to be attractive to most

Table E.8
Are you aware of any questionable practices or barriers to fair housing choice in land use policies?
State of Minnesota
2011 Fair Housing Survey Data

Comments
Almost every jurisdiction has zoning that clusters multi-family housing. The suburbs are the most egregious offenders.
City codes often restrict multi-house developments to various tracts.
City of Willmar wanted to add new multi-family complexes in exisiting multi-family area, which would have been more congestion. Citizens appealed and won.
Exclusionary zoning mainly in suburbs, Neighborhood groups and local government refusing to allocate limited resources to address the greatest needs housing. That is family housing and housing for disabled,
I believe our laws don't always favor the best choices in land-use.
In our communities we see resistance to allowing any new multi-family housing to be built due to the perception that it will be rented to low income households with many children and a high percentage of minorities or recent immigrants
It is still very difficult to site low-income housing, with many restrictions and requirements from local governments, that make these developments more expensive.
Lack of appropriately zoned land for rental housing. Higher local government standards for affordable housing development. Lack of local government support for affordable housing. Local government discrimination against housing for the chemically dependent.
Large lot size and restricted desity policies. Restrictions on group homes.
Many communities create barriers so that multi-family housing cannot be built in their area.
Many zoning ordinances use single-unit category versus mulit-unit category to direct where structures of a particular category can go. This causes multi-family properties to be concentrated in certain areas. Minimum lot size creates economic conditions that tend to concentrate higher priced homes and more moderately priced homes in certain areas.
Minimum lot size for single family
multi-family complexes tend to be in the inner city, seems like suburbs do not like affordable housing.
multi-family residentail restrictions
Multi-family tends to be the 'transition' areas rather than the quieter neighborhoods, i.e. closer to the main highway or business. Multi-family is all too often the buffer between noise and quiet.
My single family home, and entire neighborhood of residences, has been rezoned "high density," with no consideration for the residents. A decade ago there was an attempt to rezone the area for industrial use. There is no consideration what so ever of the actual residents and tax payers in these plans, and when concerns are voiced they are met with disrespect and disreguard.
neighborhood opposition to certain types of housing
not in our community
not qualified to discuss
Not sure what the recourse is, but the resistance to multi-family construction is definitely more of a cultural mainstay in suburban communities (e.g. primarily white in composition)
reservation housing
Section 8 and other subsidized housing continue to be placed in overconcentrated areas or nowhere at all. NIMBY neighbors show up when new developer wants to build mixed income units in nice suburban neighborhoods... instead builds in area where there already is AH resulting on concentration of poverty.
Seems like communities don't want low income rental in some residential areas and those residents raise a huge fuss about it and the community folds and builds elsewhere.
There is a whole lot of NIMBY in St. Cloud and Western Minnesota
this is a real issue - most zoning ordinances accross the state designate where MF is allowed to protect SF - and why wouldn't they, MF presents circumstances with different traffic, gathering, noise, heights - it is not about discrimination, it is about different needs/issues, etc.
We have long practiced economic segregation through zoning laws. This has been bad for the environment and allowing neighborhoods and housing needs to evolve as needs change.
We segregate our communities too much via housing types
Where group homes are placed.
With out laws I have seen multiple rural "trailer parks" go up in certain rural areas, while other areas seem block this from happening.
Zoning not allowing low-income multihousing units to be built. NIMBY

Table E.9
Are you aware of any questionable practices or barriers to fair housing choice in zoning laws?
State of Minnesota
2011 Fair Housing Survey Data

Comments
"Model" zoning ordinances that restrict placement of housing with in-home services to institutional/light industrial areas.
Absolutely and when they have to go to zoning authority for a change, neighbors show up and elected's cave.
Again, there is much NIMBY that exhibits little understanding of the people in group homes.
Barriers to locating group homes in residential areas.
Certain district councils will not give their approval for group homes in their neighorhoods.
Commercial properties --allowing residential areas upstairs would keep people in the area to help prevent thefts.
community needs affordable housing and needs to rezone an ideal area for afoordable but community won't allow it. NIMBY
Density restrictions
elected officials caving in to neighborhood pressure and denying certain types of housing
Exclusionary zoning mainly in suburbs, Neighborhood groups and local government refusing to allocate limited resources to address the greatest needs housing. That is family housing and housing for disabled,
I believe communities do zone areas as feasible for buffers to protect the vulnerable.
I have heard of neighborhoods refusing to have a CD group home in their area.
I know there is a law which says group homes have to be a certain distance apart.
I've read about cases - seems clearly discriminatory to me.
In response to pressure from middle and upper income taxpayers, local governments are too restrictive about locating affordable housing and housing for people with disabilities. Local elected officials often do not stand up to defend the rights of these constituents.
Individual communities have tried to restrict the development of housing for persons with mental illness and/or homelessness.
It seems those groups close to the politians and big corporations can get zoning laws changed to benefit whatever they want
Lack of appropriately zoned land for rental housing. Difficult process for rezoning. Took much power given to local residents opposiong affordable housing development (NIMBY).
location next to particular other businesses.
lot size, mimumun sq. feet req. Garage requirments, limits on rental
Many communities develop residency restrictions so that level III predatory offenders cannot live anywhere in the community.
My single family home, and entire neighborhood of residences, has been rezoned "high density," with no consideration for the residents. A decade ago there was an attempt to rezone the area for industrial use. There is no consideration what so ever of the actual residents and tax payers in these plans, and when concerns are voiced they are met with disrespect and disreguard.
neighborhoods often become polarized when group homes are proposed and people can be very "NIMBY."
NIMBY
NIMBY, often local governments are hesitiant to allow afordable housing in their communities. Need more land appropriatelu zoned. obtaining a conditional use permit is an explosive process that causes more fear for people who have no background with the various disabilities or require amenties that increae the cost of housing and therby shutting people out of opportunity to live in a "nicer" less poverty concentrated area (where there is probably better employment opps too)
Restrictive zoning that makes it difficult to have housing other than owner-occupied housing.
safe neighborhood laws that prohibit renting to people with felonys/
same as above
see above
Sometimes zoning laws allow for group homes, and neighbors and residents do not want to allow it.
There seems to be a lot of resistance to any policies that would encourage multi-income housing. Also, the "predatory offender" zoning restrictions are a fear-driven scam that's going to quickly create a homeless population, many of whom are not actually dangerous.
There should be only one category for housing under zoning law. The area is zoned for housing or it is not zoned for housing due to safety issues ie flood zones, freeways, etc. Within a single zone for housing all housing should be permitted whether it is for single family, duplexes, multifamily or special needs housing.
This is very common in zoning ordinances.
zoning to avoid concentration of group homes to specific neighborhoods

Table E.10
Are you aware of any questionable practices or barriers to fair housing choice in occupancy standards or health and safety codes?
State of Minnesota
2011 Fair Housing Survey Data

Comments
A number of the communities in our rural area have almost no enforcement of health and safety standards. My perception is that the belief is that middle and upper income people do not have this problem and that the housing that poor people does not have to be in good condition.
Although I don't think it is that uncommon.
Bedbugs + Gay man = reason for eviction
Cities throughout the State of MN set up barriers to families in their rental ordinances by restricting rental units to one person per bedroom. So, for example, a three bedroom home can only be rented to three people, when in reality it could accomodate three to six people. This is a huge problem and it is getting worse as more and more cities adopt restrictive rental ordinances.
Codes could be releaxed for some large families that will allow them housing, perhaps three small children to a bedroom rather than just two. Only two children to a bedroom causes some owners to have to evict large families from a three bedroom unit when a new baby is born.
Codes either enforced against immigrants and people of color more harshley than whites, or not enforced at all because everyone is poor and of color or poor and immigrant.
Codes in general are not enforced as much in outstate Minnesota, from building codes, ADA, ethnic populations, OSHA, etc.
cultural differences
Dakota CDA appears to be pretty lax in enforcement regarding black mold..
East side of St. Paul, slumland lords
health and safety codes are regularly not addressed in lower priced apartments in my city
Health and safety standards are not as stringent or enforced for private owners.
heard about one landlord-accepted more than the law states per unit. One BR aot, cab have 5 tenants, only two related, and he took in 8. And accepted 5 persons to occupy a small effiiency.
Housing code enforcement tied to neighborhood crime free housing unfairly targets low income, minorities.
I have been in bad rental units. Tenants will not speak up or they get no action from their landlord (put up with issue or move out).
I have heard about crowed apartments with minorities or immigrants occupying apartments, which may not be consistent with other tenants.
I jsut know there are too many slum landlords out there and people are living in horrible conditions....why aren't more of these landlords closed down...?
I see many rental properties with licenses, but in very bad repair/ pest infestations/ etc. I wish inspections were required for rental licenses- or if they are, they should be at lease every 2-3 yrs.
I've heard of cases where they are not enforced in a few rental buildings where the rent is low. Low income people
I've seen rentals that were obviously not up to code. But if you force the landlord to do that, it's going to raise the rent beyond what some of the tenants can afford, so I don't know what the answer is.
If a person is living in a home that is Sect.8 or some other progam or just plain affordable the tenent doesn"t have option of complaining or requesting... because they risk losing their housing
It appears some immigrant households are in 2 bedroom units with 6-8 people in the rental. It doesn't appear that anyone enforces this.
It happens
Lack of codes in rural communities allow "anything goes" environment. There are not standards to be met.
Large families, especially refugees, are hard pressed to find affordable housing that meets their family size.
Lenenacy to people of color and immigrants
Low income families that do not have a subsidy to guide the LL into HQS standards tend to live in low quality dwellings.
low-income/subsidized apartment buildings appearing to have substandard upkeep; complaints from tentants who rent subsidized apartments not get responses from landlords regarding repairs/upkeep issues
Migrants packed into trailer courts many people per trailer.
My home is located within two blocks of Karmel Square and Karmel Village. Developer Basim Sabri has already been convicted and incarcerated for bribery of City Council members, yet is allowed to build and operate multiple properties with multiple violations.
nuculasr land

Occupancy standards are used to discriminate against large families. Mobile Home parks are not regularly inspected to meet health and safety codes.

Occupancy standards make it difficult for large families to find any housing at all.

Occupancy vs Safety Codes. More people could actually safely occupy a space than what is allowed. Ie. in Bloomington its 75Sq Ft of sleeping space for 2 people and an additional 25 for each additional person.

On rental properties, especially single family homes.

Several TV stories relating to "slum lords"

Slumlords, slumlords, slumlords. Oh, did I mention slumlords?

State fire code is not intelligible and may be read to unreasonably restrict the nubmer of people in hoousing units, negatively affecting families with children, new immigrants and perhaps, people with disabilities liiving in congregate settings. There are other problems with the Codes that may unduly limit choices of people with mobility limits.

This is based off of the landlord's willingness to take care of health and safety at their rental property- immigrant communities just happen to live there.

we do have our share of slumlords who manage to slip under the radar until such time that someone reports them to local authorities...oftentimes when a client is attempting to access Section 8

we must have occupancy standards that are enforced. I understand cultural backgrounds of people, but we have rules for a reason and sometimes our rules and laws override cultural backgrounds.

Table E.11
Are you aware of any questionable practices or barriers to fair housing choice in property tax policies?

State of Minnesota
2011 Fair Housing Survey Data

Comments
don't know a whole lot bout how taxes are determined but I sense an inequity there - Assessed value/ tax value???
Elimination of Homestead Credit
Federal government tightened up on any tax credits to discourage growth and building of affordable housing.
Greater ease of use for property tax policy that provides lower rates for affordable housing.
I sold my townhome in 2006 and the closing was on Dec. 11. When I called Carver Co. regarding my property tax refund, I was told that I wasn't entitled to the refund because I didn't own the home on Jan. 2. My real estate agent never informed me and I felt it was extremely unfair since I had paid the taxes up to the closing date.
In some areas, the city/state shouldn't raise property tax due to neighborhood maintenance done three blocks away.
Many homeowners doing projects themselves cannot receive the same tax breaks as those who can afford to hire the work done.
More tax credits for creating accessible housing is needed.
Need for lower tax structure for affordable housing, stronger recognition by local governments of their responsibility to allow and support affrodable housing.
Need tax credits available to moderate income people
Properties in this state are discriminatory against the poor and those who rent. Property taxes should be at a minimun and taxes collected based on the ability to pay.
Prpoerty tax credits favor homeowners over renters. Having incentives for modificaitons (not accommodations) would be a good idea.
state goverment should force local goverment to accept some forms of tax credits because local goverment will never accept accommodations or modifications because it will affect the bottom line in what is collected by the cities for taxes
Tax burden shift away from higher income folks to lower income people via conservative tax policies
The renters credit has been cut back over ande over. There should be renter rebates on a par with homeowner tax rebates.
The window of time to appeal valuations is absurdly short, and the valuations are also absurd. We are being taxed on falsely inflated property values.
There is no assistance for making reasonable accommodations.

Table E.12
Are you aware of any questionable practices or barriers to fair housing choice in the permitting process?
State of Minnesota
2011 Fair Housing Survey Data

Comments
As far as I know only English is offered
as noted previously
Exclusionary zoning mainly in suburbs, Neighborhood groups and local government refusing to allocate limited resources to address the greatest needs housing. That is family housing and housing for disabled, Exclusionary zoning mainly in suburbs, Neighborhood groups and local government refusing to allocate limited resources to address the greatest needs housing. That is family housing and housing for disabled,
However, there are fewer resources available in rural MN and materials are not always readily available and must be ordered.
I've not seen where alternate language materials are available for the permitting process BUT in rural Minnesota I think that the permitting process is often overlooked or not enforced.
If not offered in other languages, yes this is a barrier
In our small community most everything is in English .. currently everyone here
Is your example something you can initiate?
Local officials are not always clear on permit requirements, and change what they request umexpectedly and without clear legal authority.
MAterials are in English only in my small rural community
our small community does not have permits available in alternate languages
Should be more user-friendly and less expensive and time consuming,
Small communities do not have alternate language materials and could not afford to prepare on the chance that someone may need a certain language.
Some communities have at least attempted to have English only forms.
there are language barriers and having things printed in a different language may be necessary, but english is the spoken language in this country and if immigrants are moving here then they need to be directed to a local english speaking class to help break that barrier.
There islittle second language material provided
They are available only in English at present.
this should be done, but in a time where local budgets and state funding is being cut, as well as the very limited need - do you print in different languages if the need only occurs once every 10+ years??
Usually materials are not available in other languages other than english.
While I have not encountered this I expect that the lack of spanish and other languages are a problem for some.

Table E.13
Are you aware of any questionable practices or barriers to fair housing choice in housing construction standards?
State of Minnesota
2011 Fair Housing Survey Data

Comments
I gave an example of this earlier with older adults
It seems that the only places that pay any attention to this have some sort of funding from the public sector.
Many carpenters or contractors in Greater Minnesota are unfamiliar with codes or requirements for handicap accessibility.
material requirements outdated and alternatives that cost less are banned
More green standards education.
More prevelant in small communities, 2,500 or less.
Most of the small communities in MN have no building code standards at all. They typically do not want to adopt the State building code due to the expense of having a building official to uphold the standards
Mr. Basim Sabri has not been held to building codes on his projects, and consistently builds without permits and inspectors take no action.
No building code in many rural communities creates an "anything goes" environment. There are no standards.
No building inspector in my small rural community
Older housing is not up to par with modern constuction

Some clients have shared that their repairs done through programming and contractors have not been as stringent. I have one client whose basement wall was "repaired", but still is cracked and is now cracking walls on the main floor, the city inspector said he believed it shouldn't have passed inspection and yet the agency who hired the contractor not only asked the client to back date documents, but closed the case without fixing the problem.

Trying to apply for permits and understanding building codes

Zoning that uses structure/design restrictions to limit large (often minority) families from living in area.

Table E.14
Are you aware of any questionable practices or barriers to fair housing choice in neighborhood or community development policies?

State of Minnesota
2011 Fair Housing Survey Data

Comments

Again, citiies themselves restrict this type of development.

Again, the resistance to building multi-income housing. Some of that may be vaguely racist, but it seems to be more a fear of living with "the lower classes" (e.g., that they'll bring increased crime, drugs, noise, etc.)

All these questions and suggested answers are areas of concern of course when the application of Fair Housing laws come into play, but what are you suggesting here? Are these initiatives MN Housing is looking at? It is unclear from the survey how to respond? If you were to ask - are you in favor of changing known policies which encourage discrimination - I would say yes. Try this survey again, but restructure it to get opinions rather than conclusions.

Despite the Whittier Neighborhood Pedestrian Overlay and plans, and stated focus on sigle family housing (which is not a personal focus), the neighborhood is being turned into high density. I am in favor of affordable housing--I am not in favor of destroying affordable housing to build shabby falsely advertised "luxury" condos and apartments that are both a visual blight as well as bringing far too much car traffic to the area.

Exclusionary zoning mainly in suburbs, Neighborhood groups and local government refusing to allocate limited resources to address the greatest needs housing. That is family housing and housing for disabled,

Federal NSP monies spent in Dakota County totally overlooked over 100 units for assistance in a racially mixed, high foreclosure rate area..

How are these different than zoning issues?

I believe our laws don't always favor the best choices in land-use.

It is often used, to prevent degradation of older housing stock, to prevent overall blit in areas and encourge properties to be affordable to lower income families.

Lack of any homeless shelters or battered women shelters in area.

local goverment policies do not encourage alternative development with some cost offset from regional or state government

Local officials are not always clear about requirements from the beginning, and add new ones halfway through the process. This adds to the cost of building affordable housing, and makes projects less feasible. These occurences work to discourage the development of affordable housing because of the difficulty.

Making affordable a higher priority. Higher local government standards for affordable housing development. Lack of local government support for affordable housing. Local government discrimination against housing for the chemically dependent.

Minneapolis policy to not build LIHTC projects in impacted areas can translate into no quality affordable rental housing being built

Much, much NIMBY

Need greater support of affordable rental housing.

Not necessarily the written policies, but the unwritten ones and the reactions to NIMBY creates barriers to Fair Housing

Not sure if this is what it is asking, but some communities limiting low income housing to be developed.

People in power give too much credence to the NIMBY effect, which often leads to discrimination.

redevelopments areas

Removal of mobile home parks or, on the other extreme, refusal to enact housing standards that would require park owners to improve conditions.

see 1.

see answer to #1 on this page

see my answer to question 2

targeted development of affordable rather than broad inclusionary policy

There are still NIMBY problems for multi-family housing, housing for people with disabilities and subsidized and even unsubsidized lower cost housing.

These policies are used to stop change and exclude whoever is deem an undsireable resident.

Trailer Parks

Table E.15
Are you aware of any fair housing compliance issues with any public housing authority?
State of Minnesota

2011 Fair Housing Survey Data

Comments
Consistently denying access to public housing if aware of mental illness disability.
How bout this one- empty apartments, with supposed 2 year waiting lists, sitting empty for months because when turn over does occur releasing and repairs aren't made in a timely fashion
I think the factor to consider here is what is determined to be "fair and reasonable" accommodations. We are often asked to do things to retrofit a unit which are too expensive to be reasonable.
issue regarding size and breed of dogs allowed as a reasonable accomodation
Limited accomodations for people with mental illness. Stating that they need to be working, being too involved in personal lives of clients that do not pertain to housing rules
Local CDA has problems "porting in" especially African refugees from outstate.
Many public housing authorities in MN are not open to using discretion to allow an individual with a felony criminal record in public housing.
Mpls PHA continues to use "able to live independently" as an admissision criteria thus discriminating against people with disabilities. It also does not recognize alcoholism as a basis for disability.
not having translators for people who don't speak English. difficulties for people with mental illness .
not sure where this fits...but an issue we have been dealing with lately is regarding bed bugs and the responsibility of the housing complex owner/operator vs. the individual (where the infestation was found) for the costs of extermination....the housing folks are saying the client (who has mental illness and has low income) is totally responsible for the total extermination of the multi-apartment building....which seems very unfair to us
Our housing director requires copies of diagnostic evaluations for people with mental illness. She also requires a credit history and has denied housing based on the fact that a person has a rep payee, so has no credit history. She is less restrictive if she knows and likes the proposed resident. However, she has so much power, that nobody wants to push the issue and challenge those decisions.
plenty of complaints against HAs who allegedly refuse to make reasonable accommodations, treat people with mental illness in a discriminatory manner.
Primarily cases of severe mental health disabilities (where physical cues are not present).
Some VAWA violations
those with felonys
Unhless someone can advocate for the disabled person they often do not get the accommodations they are entitled to

Table E.16
Are you aware of any barriers that limit access of minority populations to serving as representatives on state or local boards, commissions, etc.?
State of Minnesota

2011 Fair Housing Survey Data

Comments
A person of color or with a limited income isn't viewed as being educated/smart/enough or their opinion is disregarded. They might be able to be a token example and have their voice heard . Still very limited access and /or opportunity to low-income persons in general.
Advertisements/notices are only in English and I know of no other outreach to encourage representation from minority/LEP populations.
Decisions made by these representatives almost always result in adverse affect on minority communities and therefore the trust between minority communities and elected reps is very low - not likely to run for office if the representative body does not embrace equity and inclusion.
Everyone meeting I go to, communities of color and low income people are not represented on boards, committess that make funding decisions There is no outreach to those communities, the same non-profit, govenment leadership is on all the committees and boards
Given the lower average incomes of minority populations, it is very difficult for them to raise the money needed to run for local office such as city or county board. This also makes it difficult for many people of color to sit on nonprofit boards, due to lack of reliable transportation or a flexible work schedule to attend meetings.
I just know that they don't serve but I am unsure as to why.
Lack of communication with minority populations
Lack of public advertising to get involved with local boards and lack of welcome to those different than the already white, life-time residents currently on the boards.

Lack of visibility, not perceived as "rooted in the community" and therefore not given a chance to be representatives, even if they've actually been rooted in the community for years.
language barriers
Language barriers
Language issues may be a problem. Inadequate spatial integration of communiteis limit this since people of color are segregated from white residents. The biggest problem is probably that there are not enough people of color in leadership who can use their community and social networks to increase this participation.
Language, immigration status
Need English speaking ... can speak other languages but must be able to communicate in American English
Our area is very rural so trasnportation to meetings can be a barrier. Attending a meeting can take several hours so the ability to take time off from work is also a barrier to many people.
Passive recruitment
People's judgments based on ignorance and hate
Placement of openings of these positions often limits participation.
predjudioce
Public bodies recruit people they know. They don't know minority people or immigrants.
Simply that such openings are not thoroughly advertised in communities of color.
Some communities are not very welcoming.
The biggest barriers are not communicating with these populations that these types of organizations exist and how they could be involved and what it would mean for their community.
The money and backing to campaign.
They have changed most boards and commissions to meet in the late afternoon or evening which is better than day time.
Time of day, location Must search out the information
Transportation , childcare , language and being comfortable with people they are not familiar with .
with out laws, seems that the "good Ol' boy" network is alive and well.

Table E.17
Are you aware of any barriers that limit access of minority populations to serving as representatives on state or local boards, commissions, etc.?
State of Minnesota
2011 Fair Housing Survey Data

Comments
A person of color or with a limited income isn't viewed as being educated/smart/enough or their opinion is disregarded. They might be able to be a token example and have their voice heard . Still very limited access and /or opportunity to low-income persons in general.
Advertisements/notices are only in English and I know of no other outreach to encourage representation from minority/LEP populations.
Decisions made by these representatives almost always result in adverse affect on minority communities and therefore the trust between minority communities and elected reps is very low - not likely to run for office if the representative body does not embrace equity and inclusion.
Everyone meeting I go to, communities of color and low income people are not represented on boards, committess that make funding decisions There is no outreach to those communities, the same non-profit, govenment leadership is on all the committees and boards
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Language barriers

Language issues may be a problem. Inadequate spatial integration of communiteis limit this since people of color are segregated from white residents. The biggest problem is probably that there are not enough people of color in leadership who can use their community and social networks to increase this participation.

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Need English speaking ... can speak other languages but must be able to communicate in American English

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The money and backing to campaign.

They have changed most boards and commissions to meet in the late afternoon or evening which is better than day time.

Time of day, location Must search out the information

Transportation , childcare , language and being comfortable with people they are not familiar with .

with out laws, seems that the "good Ol' boy" network is alive and well.

Table E.18
Are you aware of any fair housing compliance issues with any public housing authority?
State of Minnesota
2011 Fair Housing Survey Data

Comments

Consistently denying access to public housing if aware of mental illness disability.

How bout this one- empty apartments, with supposed 2 year waiting lists, sitting empty for months because when turn over does occur releasing and repairs aren't made in a timely fashion

I think the factor to consider here is what is determined to be "fair and reasonable" accommodations. We are often asked to do things to retrofit a unit which are too expensive to be reasonable.

issue regarding size and breed of dogs allowed as a reasonable accomodation

Limited accomodations for people with mental illness. Stating that they need to be working, being too involved in personal lives of clients that do not pertain to housing rules

Local CDA has problems "porting in" especially African refugees from outstate.

Many public housing authorities in MN are not open to using discretion to allow an individual with a felony criminal record in public housing.

Mpls PHA continues to use "able to live independently" as an admission criteria thus discriminating against people with disabilities. It also does not recognize alcoholism as a basis for disability.

not having translators for people who don't speak English. difficulties for people with mental illness .

not sure where this fits...but an issue we have been dealing with lately is regarding bed bugs and the responsibility of the housing complex owner/operator vs. the individual (where the infestation was found) for the costs of extermination....the housing folks are saying the client (who has mental illness and has low income) is totally responsible for the total extermination of the multi-apartment building....which seems very unfair to us

Our housing director requires copies of diagnostic evaluations for people with mental illness. She also requires a credit history and has denied housing based on the fact that a person has a rep payee, so has no credit history. She is less restrictive if she knows and likes the proposed resident. However, she has so much power, that nobody wants to push the issue and challenge those decisions.

plenty of complaints against HAs who allegedly refuse to make reasonable accommodations, treat people with mental illness in a discriminatory manner.

Primarily cases of severe mental health disabilities (where physical cues are not present).

Some VAWA violations

those with felonys

Unhless someone can advocate for the disabled person they often do not get the accommodations they are entitled to

Table E.19
Are there any other public administrative actions or regulation that act as barriers to fair housing choice?
State of Minnesota
2011 Fair Housing Survey Data

Comments
As it relates to convicted felons and sex offenders. In addition it is legal for landlords to conduct credit checks and inquire as to how many police calls were made to a residence (someone experiencing domestic abuse and trying to flee her abuser - would find it difficult to find her own housing)
Definition of rems regarding Section 8/public assistance discrimination.
denying clients housing based on crimes they were accused of but not convicted of and holding crimes against them that shouldn't be such as DWI's
Duh it is called zoning along with building codes that go well beyond basic energy conservation, health and safety issues, etc.
Ex-felons Treatment Policies and practices
Houisng directors have too much power to establish unfair policies with no oversight.
HUD barriers to the Housing Choice Voucher conflict with allowances made for homeless programs which limits tenant access to mainstream subsidies.
Lack of knowledge of the law and how to file complaints.
Local County human services only provides emergency cash assistance (which low income households often use to pay housing deposits or back rent) to households with children. Homeless adults without children at a significant disadvantage when it comes to getting help.
Need for greater protection of low-income people and developments that serve them.
not having administrative items in an electronic format for citizens to use with assistive technology.
Previous methamphetamine users/dealers with felonies are prevented from accessing low income housing, jobs, and, while, methamphetamine is more dangerous if someone is making it at their home, but it's a drug that people get addicted to just like any other drug, and, provided the individual can provide proof of sobriety and refrain from those behaviors, they should be able to access low income housing. Often, addicts are the people that need the most help to get back on their feet. This includes meth addicts.
Reasonable accomodations to have companion animals creates barriers for those with animal allergies to rent an apartment in a "pet-free" community.
Red tape.
Renters who receive assistance are forced to apply for housing in other areas. For example, someone who has lived in Bloomington for 10 years and then has to apply for housing in Minneapolis and then move there. The Minneapolis housing units for these people tend to be in bad neighborhoods with much crime.
safe neighborhood programs that resitrict landlords to rent to people with felonys.
The definition of long-term homelessness is very exclusive. Many people are left out of public housing opportunities as a result of not meeting the very strict definition of long-term homelessness.
The govermnent made it mandatory to do criminal back ground checks for Section Eight. Before we did not have to do this.
The lack of affordable housing and a mandate that it be included in all construction projects. I know there is some in communities that have chosen to mandate a certain percentage of work force housing, but believe this is left up to the communities themselves.
USDA subsidized housing has onerous amount of paperwork to continue rental subsidies when the property is transferred or sold.
Watch the Cities and their ordinances.

Table E.20
Are you aware of your jurisdiction's definitions of "dwelling unit," "family," or "disability"?
State of Minnesota
2011 Fair Housing Survey Data

Comments
A dwelling is a building or one or more portions of a building intended to be occupied exclusively for residence purposes. A family is an individual or two or more people related by blood, marriage or adoption living together as a single housekeepint unit, or a group of not more than four persons not so related maintaining a common household.
All are clearly defined in the city code.
Defined in the State Building code
disability-have a physicl or mental disability that substantially limits one or more major life activities
dwelling unit is where a person lives family is made up of more than one person disability is a person that has a mental or physical imparment.
Dwelling unit - a place that is meant and built for human habitation Family - one head of household- can be mulitfamily. Family can be defined by culture. Disability - a barrier that may prevent someone from carrying out "normal" activities or functions
Dwelling unit - a residential building or poriton thereof intended for occupancy by one or more persons with facilities for living, sleeping, cooking and eating. Family - An individual or two or more persons related by blood, marriage, adoption, or a functional family living together in a dwelling unit and sharing common cooking facilities. Disability - the condition of being disabled.
dwelling unit - one (1) or more rooms which are arranged, designed or used as living quarters for one (1) family only. Independent cooking facilites, permanently installed and individual sanitary facilities shall always be included for each "dwelling unit". family - a family is any number of persons living together in a room or rooms comprising a single housekeeping unit and related by blood, marriage, adoption or any unrealated person who resides thereon as though a member of the family including the domestic employees therof.
dwelling unit - where people live one or rent family- who reside in the homw disability- handicap, physical or mental, mobility and visual illness, AIDS
Dwelling unit - where you live. Family - your core group or unit (often living together) Diability - having some type of issue out of the norm, that limits your daily functions.
Dwelling unit is a generally an apartment or an attached home of some sort - where there's more than one unit that separate families live in. Family, is related by blood, marriage, or adoption, foster child arrangement. Disability - is physical or emotional impairment that makes it impossible to complete a particular task on your own.
dwelling unit is a home or apartment
Dwelling unit is a non commercial purpose unit where people can life; Family is one or more individuals; Disability is a physical or mental impairment that substantially limits one or more major life activies;
Dwelling unit is a structure meant for housing
dwelling unit is any unit that meets basic housing quality standards; family includes single person households and households who consider themselves a family unit. Disability means that one or more life activities are limited and the limitations are expected to be of a long duration.
Dwelling unit is BR size of rental, family varies by type of HUD property (i.e. 202 PRAC different that Section 8).
dwelling unit is the living residence for a household, ie; apt, house, family may be a household unit with a relationship between members; ie parents, sisters, brothers, grandparents disability is any identified/recognized physical, mental or emotional barrier to meeting needs for daily activities
dwelling unit is the unit/house in which one or more persons reside. Family is considered two or more persons that may or may not be related who reside in a dwelling unit. This may include a pregnant women with an unborn child. Disability can be physical, sensory or mental impairment which limits one or more major life activities.
dwelling unit means a house, apartment, town home, mobile home or mobile home lot. Family means anyone in the family whether or not married, related or dependent. Disability means either mental or physical and we are not allowed to ask what the disability is even though we may require a doctor's verification that a disability exists if we are unsure and the applicant / tenant is claiming disability status or asking for a reasonable accommodation.
dwelling unit would be a single family home, duplex, or apartment, family would be related persons, and disability as defined by law.
Dwelling unit would be a unit (apartment, townhome, duplex, etc.) designed for use as residential housing. Family would include members of the household that live there. Disability has a long legal definition.....
Dwelling Unit- Place of residence Family- Household with more than one person Disability- Verifiable disorder

Dwelling Unit--where someone lives. Family--A single person or group of persons living together where each individual's resources are available to meet the needs of the family. Disability--Having a history of a physical or mental impairment that substantially limits one or more of the major life activities of an individual.

dwelling unit-building/strucuture/unit that provides shelter and has living/sleeping areas (can have a shared kitchen or bathroom) Family: any household where there is a head of household, and other members disabilty: any person who has been designated as having an impairment that impacts their abilty to perform certain tasks or activities

Dwelling Unit-home containing a kitchen and used by the occupier as a place to live. Family- a group of people living together in a home. Disability-Is a medical condition that restrict the individual to do his/her activities.

dwelling unit-livable space, family-group of related persons, not necessarily by blood, disability-as defined by the law

Dwelling unit: any apartment or house suitable for occupancy Family: A single person head of household or related group of family members Disability: any physical, mental or emotional condition that limits normal mobility or activity

dwelling unit: Where you live family: persons who make up a household and live together disability: anything that impedes ones ability to participate to normal day to day activities of life.

Dwelling unit: a place fit for human habitation. Family: A household comprised of at least 1 adult and 1 child. Disability: don't know this one.

dwelling unit: space occupied for housing family: the unit of related persons disability: a hardship needing extra attention when renting housing

Dwelling; the part of a building intended to be occupied for residential purposes; not including motels, hotels, etc.; Family, one or more persons each related by blood, marriage, adoption or group of not more than four persons not so related;

Either defined in our ordinances or voting regulations

home, house, place of residence. cohabitation mental, physical, or other such impairment that limits ones ability to enjoy one or more of life's major activities.

HUD regs and housing policies

I am a member of the planning and zoning committee

I could take a stab at it, but I'd be totally guessing.

I think "family" has to be people who are related and "disability" has to be defined as the Americans with Disability Act would define it?

If needed I look them up in the codes as some codes have these definitions - that is the zoning code does not include a definition of disability.

In our area a dwelling unit (for rental purposes) is a licensed unit that meets code and inspection standards. We define a family as one or more people who may be related by blood or marraige, or who choose to live together in a martial type relationship, or two equally disabled people whho choose to live together. We use the HUD defintion of disability, long -term or life long inability to be gainfully employed..

It is different city vs co. and feds.

These are common sense terms.

Why are only 2 related persons allowed to occupy a 1 br apt? that prevents a family from living together.

Table E.21
How should fair housing laws be changed?
State of Minnesota
2011 Fair Housing Survey Data

Comments
Add source of income as a protected class so that LL cannot discriminate against Section 8 tenants.
Age should be included and not just to inclued the elderly, but to incl youth as well
An inclusion for elderly and those with pets that are needed for their mental health for protected classes would be great. Not all persons wtih mental health issues are able to keep their pets and it is a detriment to their ability to deal with their mental health issues.
Broader definition of disability
Come into line with federal law.
Conform more closely to Federal concerning assistance dog access to housing. They are different now and this causes problems.
Consider housing for people with felony's providing and depending on the type of felony
Fair housing laws are vague when it comes to reasonable accomodations for other than physical disabilities; if we are going to have laws regulating fair housing, then the law should be specific as to reasonable accomodation in all cases; not just physical disabilities.
Have no issues in our area But as soon as you ask the resident to fill out the form on nationality or race they are upset. Asking if they are a US Citizen is all we should need to know. If born in USA.. you are American ! Shouldn't matter about your ancestry.
Housing programs with programming for women should not have to rent to men to be in compliance
Human rights enforcement organizations should be much more aggressive in dealing with repeat offenders. Enforcement organizations should take action when complaint is filed where it is clear a tenants rights have been violated. There needs to be quick decisive action taken to keep tenants with legitimate issues from eviction or "losing right to start a rental agreement.
I attended a meeting that discussed fair housing. The statistics showed that Minnesota had what I thought was very few complaints to HUD on the last survey. Knowing that a portion of these complaints were probably unfounded, I felt this to be a very low number.
I believe there should be more helpful services for those that have bad credit issues due to our recent ecomony. Some ruined their credit because the choice was unavoidale or needed.
I have a feeling that it is somewhat balanced between tenants and landlords right now.
I think large landlords should be required to provide a fair housing brochure, including contact numbers for advocacy agencies.
I think that there needs to be more clarity in the area of disability - most specifically with the reasonable accommodations for persons with emotional disabilities. The practice vs. the original intent are far away from one another.
If a rental property is available--owners should have a chance to not rent to persons who have previously trashed the last rental properties without being prosecuted.
Include gender identity (ie transgender and gender non-conforming individuals) as a protected class
Include protection for families, who are victims of abuse and an abuser in their household.
Include sexual/partner preference as protected.
Income level should be a protected class: I wish it was illigal for landlords to turn away people who make the basic $674 SSI income due to not having the the too common "2 1/2 x the rent" requirement. This makes it nearly impossible for people with disabilities to rent their own apartment
It is too difficult to evict bad residents
Like everything else the government does, fair housing laws are difficult to understand, wasteful of time and effort. The more we can get government out of our lives the better everything will be. Much of the complicated process is done to preserve government jobs, not to help anyone.
Made more proactive, do testing
Made much simpler; the last thing we need is more mumbo-jumbo gov't bureaucracy.
make section 8 voucher holders a protected class
MI needs to be addressed by ADA laws and GLBT people lving with MI shold be a protected class of people
More specificity re: " public assistance"
More strictness on the guidelines, less wording in it, and an allowance for those who are trying to get ahead in life.
Public assistance status should be a protected class, as it does not seem to be
Resources must be available to offset housing requirements, such as adequate services for individuals with mental health issues to ensure successful tenancy. The State and Counties are dropping the ball and creating issues for landlords (particularly public housing) that we are not prepared to deal with.
Section 8 voucher holders should be protected agaisnt discrimination Disparate impact claims should be affirmed

simplefied

Start by stop punishing the people that lost everything and help them get back on there feet. Bring back the true law and punish the criminals, companies (banks, insurance companies,mortgage companies, predatory lenders) and any individual that helped conseal it and caused unjust to millions of struggling vulnerable people in poverty and homeless. Clean house get ride of all these useless programs that say they are doing something for the less fortunate when nothing was done. Example of a very costly and useless department is the Department of Commerce. Get a department that can and will punish the companies did the crime and let the people know what happened as when an individual gets a ticket or in a fight its printed in the news paper and charged with very high fines also effects there credit for years. Stop discriminating low income people with high rates, better yet get ride off the rating companies and change the way loans are processed so if you make $7.00 or $200.00 you still can raise your family in a home. Things will change along with peoples attitudes if we are treated the same as income goes.

Stricter guidelines for use by owners/landlords and stricter punishment if failed to use

Subsidized housing in Minnesota is very biased toward ex felons and their innocent families. Management companies are allowed to black list them in their tenant selection plan. This is just WRONG! They paid their debt to society and deserve to be treated fairly once they have accomplished that. There are thousands of people living in subsidized housing that are breaking the law and not getting caught. I think this unfair treatment of ex felons and their families has gone on long enough and needs to be changed because the prisons are getting fuller and more people are being labeled "ex-felon" than any other time in history due to Richard Nixon's War on Drugs. Read some of the stories....you will look at things a little differently I think. It's time to give those ex felons that really want to make it in society a chance by allowing them and their families and children into the affordable housing program, not as a protected class but as a citizen that has paid his/her dues to society and wants a chance to provide for themselves and their families. The next one arrested for a felony may be one of your family members. You just never know.

subsidized housing needs to be improved - the formula that 30% of income should be used for housing for people that are very poor poses too much of a hardship. When your income is less than a grand per month, spending 30% of it on housing leaves people unable to meet other necessary living expenses.

the burdern may be too much on the small time investor with regards to having to modify older properties for people of disability - while there are legitimate claims, it seems too easy to file a claim without substantial evidence, thus making it more "guilty" until found innocent and in many cases it is a "he/she said, he/she said".

They need to be simplified

They should be clarified to provide greater understanding to these groups that are actually protected under the law. Use common language rather than political jargon,

They should be eliminated completely.

Tkhey need to be easier to understand. Also, there is too much power given to local housing directors who discriminate in subtle ways which are difficult to confront.

To include orientation and immigration status as protected classes.

We need to address issues of a persons criminal history, credit history, how many times the police were called to their residence. Municipalities have codes which discourage or prevent landlords from renting to convicted felons, federal subsidies refuse to provide housing to convicted felons. The most dangerous convicted felon is a convicted felon who is not stably housed.

Which provisions?

Written in words that the avarage person can understand

Table E.22
What are the geographic areas with fair housing problems and what issues do these areas have?
State of Minnesota
2011 Fair Housing Survey Data

Comments
Any area set aside for one specific nation or race.
Areas around Indian Reservations have difficulty for Native people to find decent, affordable rentals. Many large property managers are doing well with this, but smaller landlords don't seem to have had enough fair housing training.
Bemidji/ Beltrami Co.
Cities with migrant labor or food processing plants that have attracted immigrant populations. These often small cities have limited capacity (or sometimes interest - depending on individual) to evaluate and respond to housing condition issues, rental discrimination, etc.
Duluth and the Iron Range.
Eagan,MN 55123: Wescott Square Development with ads prohibiting Section 8 people and fining landlords $1000.00 & $1000.00 of dollars if they accept a person as a tenant although there is no written policy in their by-laws as such.
everywhere has its issues
Greater Minnesota
Having worked in housing administration in both Minneapolis and rural Minnesota I would say that the lack of code enforcement in rural areas creates unsafe housing for low income communities.
I thiink there may be more problems in smaller rural communities where biases are held and options are limited
I would guess there are pockets everywhere depending on who is managing the property.
I would say the more rural areas have more problems because they are predominatly white and middle class. Ignorance in these areas is huge.
Just guessing but figure in all areas of the State
large cities
Large families with children, multi-generational families, GLBTQ seniors
Metro and other areas of the state that have large immigrant populations
Middle & high income geographical areas, not open to renting to low-income families, not open to low-income housing in their neighborhoods
Minneapolis neighborhoods are segregated in my opinion. In Greater Minnesota discrimination is subtle but still exists.
more of a metro or bigger city issue.
Mostly out state counties
Native american around White Earth, Leech Lake and Red Lake.
North Minneapolis, Phillips, and Whitter to name a few are stressed communities with a great need for decent affordable housing to shelter a disproportionate number of low income citizens.
northern rural minnesota.
Our area is very rural with many old homes and a small population. We really dont have segregated neighborhoods within a city in koochiching county as the cities are too small to have highly segregated neighborhoods. However, I imagine that in the metro area you have more evidence of segregated neighborhoods.
Richfield with an aging population and access to side walk barriers
rural areas
Rural areas may have difficulty due to the limited options for affordable housing and limited resources available for addressing fair housing problems.
Rural areas may have more people that are not knowledgable about these laws.
Rural areas seem uninformed about landlord and tenant rights.
Rural northern Minnesota
Rural, outstate--availability generally and Sec. 8 specifically
SE MN
Seems to be an issue in areas that the minoriety rate is higher.
small rural, not enough housing available-rentals, etc
St. Paul, Minneapolis, (East side of St. Paul, North and South Minneapolis)
Stearns county/St. Cloud--just read the paper. Testing needs to be done for the Somali population. Willmar, Marshall, Todd county, Melrose and surrounding areas are the same.
Suburban Communities through zoning, ordinance and practice tend to discriminate choice.

Suburban, rural and urban areas - in that order

suburbs and greater MN seem to have less options

Suburbs are major NIMBY communities and don't want immigrants or low-income near them.

The southern and western suburbs.

Those cities with residencey restrictions (Duluth, Grand Rapids, Cohasset, Taylors Falls, Wyoming, Albertville, Otsego, etc.). Residency restrictions prohibit level III predatory offenders from living in communities, and do nothing to protect public safety. In addition, any area with public housing that refuses to entertain the use of discretion when allowing individuals with felony criminal records into public housing.

Trailer homes and older housing stock in rural areas of the state

Washington County

Washington County and rural areas that have been my experience they are not receptive to low income families particularly of color

We have a need for moderate income housing for seniors and cannot find anyone to build/own or fund it.

Where you have large immigrant/refugee populations, you tend to see more fair housing problems.

Why only in major cities... St. Paul and Minneapolis?

Willmar - vast Hispanic and Samili population

Worthington, Rochester, Moorhead and Clay County

Table E.23
Please share any additional comments regarding fair housing.
State of Minnesota
2011 Fair Housing Survey Data

Comments
After taking this survey it is obvious that I have little knowledge of the specific conditions that could prove to be barriers to housing for protected classes. In my work with low income owner occupied housing, the most common barrier safe, secure, liveable and comfortable living is access to money and the degree to which the housing stock has deteriorated and how unable to manage the decline the occupants are.
Before approving any subdivision, large multifamily development or new housing developments require that land or units be set aside for low income households and those with special needs.
Data collection and reporting practices by race/ethinicty needs revisions
Housing regulation decisions should be left to the people living in the involved area. Too manyunfunded regulations and mandates are handed down to blanket all--and do not apply to all areas.
I am not familiar with Fair Housing rules and guidelines - it's not something I use in my day-to-day work other than land use, city utilities and other issues that local government deals with.
I really have very little knowledge of fair housing laws in Minnesota. I think housing is a critical part of rural Minnesota. As an elected official, I would like to know more about housing. I don't often have time to or the ability to attend a day long training on this, so hope that online asynchronous trainings can be made available.
I sometimes feel that the amount of time and money spent to deal with a low complaint rate for our state is excessive.
I sometimes see "For Rent" classifieds in our local paper that state "no HUD" or "non-HUD". Not sure what this means but sounds discrimitory.
I think racism is an issue in this community and at my work place. If I knew the Human Rights Commission would act on a complaint I would...but they told me (just last month) that if the discrimination did not happen directly to me I could not make a complaint. So there are two problems here: We have a staff member acting out against women, yet the director takes no action. and: Staff make off-color comments but no one acts. If there is a place where I could make a agency or personal complaint I would -- If you can put that information on the Human Rights website I would make one. But please realize privacy needs to be key and that some of us need to keep our jobs. From what i have seen age appears to be a problem. People in their 50's or older in MN are used to a white (and native american) background, everything else is change and not easy change for them to accept.
I think that if people are going into the rental business that all landlords must attend a fair housing training on an annual or bi-annual basis in order to rent property. If they don't attend then they should be fined. this would make the discrimination go down.
I think that local governments, at least larger jurisdictions, are familiar with fair housing. I think financial sectors, real estate are also familiar with fair housing. I don't know that landlords are aware as they should be.
I'm frustrated by the existence of entities like your's that are always searching for dirt on individuals or organizations that you determine are discriminating against the poor and minorities. Wake up folks. Who do you think is living in the government funded housing facilities? It certainly isn't middle aged, middle income white males and their families. Government needs to quit sticking its nose in everybody's business.
It is difficult for very small cities to be able to handle or know about all these areas. We struggle with balancing budgets and cannot afford to spend time or dollars on some of these areas, even though they are important.
It is obvious, given how often I had to answer "I don't know" that there is a gap in my awareness. I don't suggest that it is a failure on state education... it seems more the case that I haven't personally had an issue so I haven't personally educated myself on the issues.... Regardless, as a citizen I should become more aware of the issues and shortfalls
landlords should consider renting to people with felonys if they are working on their becoming a responsible citizens due to their offense
Language could be a barrier in some cases, but I am not aware of any specific cases.
Low income housing programs do not rent to persons with felonies, evictions, or bad credit. This is ridiculous, since most people who need low income housing have bad credit and possible evictions due to not having enough money to pay the rent. It would appear somewhat useless to offer low income housing, and then prevent the very people who need it from accessing it. Furthermore, our County employees are so jaded that they don't even remember names, circumstances, and don't respond in a timely manner to inquiries. I waited a year to come up on a waiting list for housing through CDC in Dakota County; then when my application came up, my previous landlord trashed me, and I had bad credit. However, even though she had three weeks to tell me I wasn't going to qualify because of these things, I was ignored, and ended up homeless - despite my telling her over and over that I needed this resolved by a certain date in order to prevent homelessness. She cared so little that she didn't even remember. I went through this over and over with County workers in Dakota County. Washington County is a little better, but not much.
Much of fair housing law is in place but not enforced or tested. A fair housing plan would be most helpful. prededice is difficult to legislate against and at least 1/2 the problem with fair housnig practice.
Need to get examples of fair housing violations in the media or in some other fashion more widely distributed. I have very little knowledge of what is occuring with fair housing other than an occasional violation being identified for a specific landlord.

ONCE AGAIN, PLEASE LOOK AT THE AFFORDABLE HOUSING INDUSTRY AND THEIR BIAS TOWARD EX FELONS AND THEIR INNOCENT FAMILIES AND CHILDREN. THEY ARE HUMAN BEINGS, PAID THEIR DEBTS TO SOCIETY AND HAVE SO MANY OBSTACLES AWAITING THEM WHEN THEY RE-ENTER SOCIETY. DECENT, SAFE AFFORDABLE HOUSING SHOULD NOT BE ONE OF THESE OBSTACLES. EVEN ANIMALS HAVE RIGHTS WHEN IT COMES TO HAVING A PLACE TO STAY WARM IN THE COLD MINNESOTA WINTERS!!

Possibly local training or mailing information packets to landlords. The City, or Counties could help with this.

since fair housing covers people of all income ranges, there should be some discussion about middle and upper income minorities and whether they are being treated in a nondiscriminatory manner in lending or equity loans. There should also be some discussion about the lack of wheelchair accessible housing for all esp families.

Something needs to be done with our housing director and as a supervisor in the county health and human services, we have tried for over 30 years to address this issue. The director manages to stay one step ahead of the unfairl practices she implements. Curently, she has targeted two residents because the residence has fleas. She is blaming one resident for the infestation, though her cat is an inside cat and never goes outside. She has expectations of eliminating the fleas that is over and above veteranarian recommendations and it raises the cost factor tremendously. She has transferred her frustrations to the social workers with expectations that we assist with these unfair treatment methods. That is just the newest example.

Sometimes as a service provider, it's difficult to get the concept across that fair housing is supposed to promote "EQUAL ACCESS" not preferential access. Some believe that if they're in a protected class, they should not have to follow ANY rules that others are subject to.

The current laws are more than adequate. Any agency that has enough funds to "spy" on landlords/realtors with "testing" is clearly a leach on taxpayers. Agencies should only respond to actual complaints; not go on "spying" trips. No wonder the state/gov't is broke.

The most effective means of improvement in fair housing practices is education, education, education.

There are a lot of little minor offenses occurring every day by landlords. Charging a little bit more for Section 8 renters but not so much that it couldn't be market driven so no agency wants to act on it. Telling someone that they are already screening someone else so that they can then go back and say they rented the unit to the first party when it was actually the 3rd, 4th or etc. party when they got a tenant they wanted. I'm sure there are many more.

There are issues in many areas; we tend to address each issue as it arises. I have to answer "no" to most of these as it isn't a standard as an issue, but becomes an issue individually.

There could be more housing available for disabled/handicapped so they do not have to be placed in a senior facility.

There needs to be more clout with Fair Housing compliance when people willfully & repeatedly violate this law.

There should be more education on fair housing with regard to marketing and advertising.

Unfortunately people take advantage of fair housing laws designed to protect people. For example, we have rejected an applicant because of a repeated criminal history of drug use. Because the person was a protected class, Legal Aid got involved. We still were able to reject the applicant, but had to spend money and time on a lawyer to defend ourselves. The laws seem to be made for the lawyers to have something to do rather than to actually protect people who need the protection.

We need to re-evaluate our policies about allowing felons into public housing, and use a more informed approach with real data about dangers to the community, etc., when making these rules.

You can't have fair housing if there is no decent housing available to low income people and that is our problem in Koochiching County.

Table E.24
Please share any additional comments.
State of Minnesota
2011 Fair Housing Survey Data

Comments
As a very low level elected official, I'm a little embarressed about my lack of knowledge of fair housing issues. In my defense, I've never had a concern brought to me.
Because many people returning from prison to communities are denied housing which causes unsafe communities and adds to homelessness and crime.
Being able to obtain a Section 8 voucher is extremely, extremely difficult to impossible for low and very low income citizens. I would like to see a huge improvement.
City of Lowry is a small community with few rentals. I personally live in a home we purchased so am unable to answer some of your questions
Especially in housing-related gov't agencies, the bureaucracy, the inneficiency, the duplication, and the waste is incredible. No private sector business would survive if run like gov't agencies. Yet the private sector pays for all this waste and inneficiency and excessive gov't employees thru its taxes. The gov't agencies want landlords/realtors to be at the peak of perfection, yet the agencies themselves are prime examples of waste, redundancy, and inefficiency.
Fair Housing has its place--but don't always make good decisions. Leave regulations to local governments and organizations who know and understand what is happening in their area, and will be able to better assist people. You have to realize that not everyone looking for housing is able to live there. I have seen destruction of properties where the renters have had assistance--and still do not know how to keep or maintain a house/residence--and I am not sure they would ever be able to!
Hud needs to monitor public housing waiting lists. and the order that people get put in, and compare it to when they applied.
I am "one of those people". I came from a low-income home, wed and divorced at a young age, was able (lottery in Washington Cty for a new program that they had developed) to utilize Sect 8... there was much discrimination when I attempted to rent. Someone told me to get rid of our family pet - it wasn"t the pet it was the fact I was a single-mom with 2 teen boys. I obtained an education and relocated where I was abe to accomplish my goal of homeownership but... High interest rates, lack of decent jobs and community supports or access to them is limited.
I believe that you should be able to eliminate the Fair Housing education requirement for Realtors who have taken it at least 2 time or can pass out of it - new agents I can see needing to take it, but I have been required to take it at 4 times, if not more.
I have worked in the affordable subsidized housing industry since 1998. I love this work and although the paperwork can be challenging, it's still the only job I want until I retire next year. I have met some obstacles along the way but the worst is the way society treats the people that paid their debt to society and are labled for life as an ex felon, therefore becoming the only human being class in Minnesota that does not have protection from housing discrimination.
I think I did this survey before.
I was so angry at Dakota County a few years ago that I actually called a Lawyer to see if I could see them. You would not believe the things I went through trying to get help from them to obtain affordable housing.
It seems minimum property standards are not consistant regarding housing in MN. The amount of black mold that is rampant in foreclosed ,unwinterized properties diminishes rental & sales greatly making the poorest of the poor even more at risk when renting.
My trainings for this have been years ago; my experience & knowledge is limited but subtleties from my observations tell me that continual education, information and testing is necessary.
Please email me and I can send other comments but have an appointment nowl.
See comments in #3.
Thank you for making this available.
Thanks, MN Housing has been great to work with.
There is a desperate need for housing for homeless youth in the suburbs. For youth to have no safe place to go is a recipe for trouble that could have lifelong ramifications. There needs to be a state policy for creating homeless shelters for youth in this state. The private sector has not been adequate. No shelter in the suburbs? Youth having to go to the city, interrupting their education and lives? Not a good idea.
We have a small jurisdiction and I have never heard of any fair housing issues. Well, one, a reluctance for landlords leasing to family's with more than 3 kids.
What I do know is, after being in property management for 34 years, the paperwork has tripled, the bureaucacy is ridiculous, and the amount of government workers and bureaucracy is prepsoterous. How about downsizing your staff by at least half, so I could keep more of my money for things like, oh, I don't know, help my grandkids go to college, maybe?? I believe the ridiculous bureaucracy is done mainly to preserve and add government jobs, not to help the "needy." If I did my private sector job like the government does, I would have been fired long ago. Get the hell off our backs, already, and while you're at it, get a "real" job for a change.