

An aerial photograph of a city, likely Macomb, Michigan. A river flows through the center-left of the image. To the right, a prominent, tall, light-colored building with many windows is visible. The rest of the city is a mix of residential and commercial buildings, surrounded by green trees. A large green diagonal shape covers the bottom-left portion of the image, containing the title and other text.

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

June 30, 2019



MACOMB COUNTY, MICHIGAN



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1.0 INTRODUCTION

Macomb County, Michigan, is a participant in the U.S. Department of Housing and Urban Development (HUD) Community Development Block Grant (CDBG) Program. Since the inception of CDBG funds to entitlement communities, HUD has required various reports to satisfy the grantee jurisdiction's compliance with all laws, applicable programs, and regulations, and to demonstrate the community's ability to carry out the program in a timely manner. As a condition of compliance, communities who are awarded CDBG funds are instructed by HUD to conduct an Analysis of Impediments (AI) to Fair Housing Choice under 24 Code of Federal Regulations (CFR), Section 570.904[c], of the federal CDBG program.

The purpose of the analysis in each entitlement area throughout the nation is to determine the possible existence of impediments to fair housing choices based upon race, religion, sex, color, national origin, disability, or familial status. If any impediments are identified, entitlement communities are directed to suggest necessary steps to reduce and/or eliminate barriers that prevent affirmatively furthering fair housing.

In the Fair Housing Planning Guide, HUD defines the AI as: “. . . A comprehensive review of states or entitlement jurisdiction's laws, regulations, and administrative policies, procedures and practices. The AI involves an assessment of how these laws, policies and procedures affect the location, availability and accessibility of housing and how conditions, both private and public, affect fair housing choice.”

Additionally, HUD updated its requirements in a memorandum dated February 14, 2000, that stated in part: “The Consolidated Plan regulation (24 CFR 91) requires each state and local government to submit a certification that is affirmatively furthering fair housing. This means that it will (1) conduct an analysis of impediments to fair housing choice, (2) take appropriate actions to overcome the effects of impediments identified through that analysis, and (3) maintain records reflecting the analysis and actions.”

1.1 FAIR HOUSING CHOICE

The Federal Fair Housing Act, passed in 1968 and amended in 1988, prohibits discrimination in housing on the basis of race, color, national origin, religion, gender, familial status, and disability. The Fair Housing Act covers most types of housing including rental housing, home sales, mortgage and home improvement lending, and land use and zoning. Excluded from the Act are owner-occupied buildings with no more than four units, single family housing sold or rented without the use of a real estate agent or broker, housing operated by organizations and private clubs that limit occupancy to members, and housing for older persons. The State of Michigan has a Fair Housing law (Michigan Fair Housing Act of 1968) similar to the Federal Fair Housing Act.

Housing choice throughout the United States has yet to realize the levels of equal access guaranteed in the Civil Rights Act affecting persons who encounter discrimination based on race, color, religion, sex,

national origin, disability or familial status. Fair Housing Choice has come a long way over the past 30 years. However, recent reports show that barriers to affirmatively further fair housing still exist.

The National Fair Housing Alliance's (NFHA) 2018 Fair Housing Trend Reports provides up-to-date published findings and show that significant barriers still exist among persons based on race, color, religion, sex, national origin, disability and familial status. Its key findings include:

- Housing discrimination persists nationwide and is severely underreported.
- Equal access to affordable, quality credit continues to be a major fair lending issue throughout the United States. Underserved populations, including African Americans, Latinos, Native Americans, persons with disabilities, immigrants and women, have long been subjected to various forms of lending bias.
- Many underserved groups continue to lack access to mainstream credit.
- Persons of color are more likely to receive subprime loans, higher cost loans, and loans with extra fees.
- In 2017 the National Fair Housing Alliance reported a total of 28,843 complaints of housing discrimination, an increase of 662 complaints compared to 2016.
- Fair Housing Groups continue to investigate 66% of all complaints received, with fewer resources.

1.2 METHODOLOGY USED

The purpose of this analysis is to identify any local housing concerns and impediments to the exercise of fair housing choice in Macomb County, Michigan. Macomb County (County) is an Urban County which is comprised of 21 local units of government including the Villages of Armada, New Haven, and Romeo; the Townships of Armada, Bruce, Chesterfield, Harrison, Lenox, Macomb, Ray, Richmond, Shelby and Washington; and the Cities of Center Line, Eastpointe, Fraser, Memphis, Mount Clemens, New Baltimore, Richmond and Utica. Inaugurated in 1982 in the Community Development Block Grant (CDBG) program, the County became a HOME participating jurisdiction (PJ) in 1992 and formed the Macomb HOME Consortium (MHC) in 2006, together with Roseville, Sterling Heights, and Clinton Township.

This analysis attempts to identify any attitudes, barriers, institutional practices and public policies which create barriers to affirmatively further fair housing within the Macomb Urban County. Research and analysis of information regarding housing choice and restrictions was based upon review of socioeconomic and housing characteristics. Data sources included, historical United States (U.S.) Census figures (1990-2017), HUD's Affirmatively Furthering Fair Housing (AFFH) Data and Mapping Tool, reports and statistics from local, regional, State and Federal agencies, Macomb County data, and interest groups. Reflecting HUD guidelines concerning "recommended contents," this analysis incorporates the background of housing choice in Macomb County; federal, state and local public policies; profiles describing socioeconomic conditions of persons who make up Macomb County; and community services

provided by the County's CDBG program. This analysis includes institutional practices that affect the level of choice available within the area's housing market.

2.0 COMMUNITY PROFILE

The purpose of this profile is to describe the socioeconomic characteristics of Macomb County, Michigan, which is essential to the short and long-term housing goals of the community. Socioeconomic characteristics include, but are not limited to, population size, age, gender, race, employment, housing value, tenure, and housing unit age. Compiling and examining data on these elements will help guide County officials in determining the housing needs of County residents.

Macomb County is located in southeast Michigan on the western shore of Lake St. Clair. It is a densely populated area that is heavily comprised of various industries and commerce. The entire county is approximately 484 square miles, has 32 miles of coastline, and is home to 31 miles of the Clinton River. Macomb County is surrounded by Wayne County (south), Oakland County (West), Lapeer County (northwest), and St. Clair County (northeast), and is less than 30 miles from Detroit and approximately 60 miles from Flint.

Macomb County was founded in 1818 as the third county in the State of Michigan. Originally much larger than its current size, Macomb County eventually gave way to its neighboring counties of Lapeer, Oakland, St. Clair, and Genesee. In the 17th century, the county served as a refuge for native peoples.

Historically, Macomb County thrived on trade and farming; however, the County experienced international fame when people began to take interest in mineral baths that run beneath the city of Mount Clemens within the County. While the mineral baths did not remain popular, the County continued to grow in population and is now the third most populated county in the State. Today, Macomb County employs over 400,000 residents and is comprised of industries in manufacturing, automotive, defense, health care, retail, agriculture, and more.

Today, Macomb County is committed to a policy of diversity and inclusion. Recreation and community engagement are important attributes of the County. In addition to more than 17,000 acres of park and recreational space, Macomb County offers collaborative community activities, restaurants, retail attractions, and local festivals making Macomb County an engaging place to live and work.

2.1 POPULATION PROFILE

Total Population

Table 1 illustrates population trends in Macomb County and surrounding areas over the 17-year period from 2000 through 2017. According to the 2017 U.S. Census, Macomb County, Michigan has a population of 864,019. According to the AFFH Data and Mapping Tool the current population of the Macomb County Urban County subset is 373,696, which accounts for less than half of the total population of the County.

Macomb County shows a positive population trend over the past 17 years, with a greater increase in the decade from 2000 to 2010 than from 2010 to 2017. From 2000 to 2010, the population of Macomb County increased by 6.7%. Between 2010 and 2017, Macomb County's population increased by 2.7%. Over the same time period, the population in the State of Michigan has decreased slightly compared to Macomb County. While Macomb County's population experienced an overall increase over the past 17 years, the rate of increase has decreased over the past couple decades.

Place	2000	2010	Change 2000-2010		2017	Change 2010-2017		Change 2000-2017	
			#	%		#	%	#	%
Macomb County	788,149	840,978	52,829	6.7%	864,019	23,041	2.7%	75,870	9.6%
Michigan	9,938,444	9,883,640	-54,804	-0.6%	9,925,568	41,928	0.4%	-12,876	-0.1%

Source: 2000, 2010 U.S. Census; 2013-2017 American Community Survey 5-Year Estimates

Racial/Ethnic Population Breakdown

Table 2 illustrates the current (2017) breakdown of Macomb County's total population by race and ethnicity. Due to changes in the U.S. Census data collection methods over the past 20 years, comparison by category is not always accurate. However, the recent data collection methodology has improved.

According to the 2013-2017 American Community Survey (ACS) approximately 97.7% of Macomb County's population is one race. The County has approximately 709,260 persons, or 82.1%, that identified as White. In comparison, 95,399 or 11.0% of its population identified as Black or African American, while 19,915 or 2.3% of its population identified as having two or more races. Additionally, 2,504 persons or 0.3% of the County's population identified as being American Indian or Alaskan Indian, and 32,261 persons, or 3.7% of the County's population identified as being Asian or Pacific Islander.

Racial Distribution	2000	Percent of Total Population, 2000	2010	Percent of Total Population, 2010	Percent of Total Change, 2000-2010	2017	Percent of Total Population, 2017	Percent of Total Change, 2000-2017
	#	%	#	%	%	#	%	%
Population of One Race	774,201	98.2%	823,344	97.9%	6%	844,104	97.7%	9.0%
White	730,270	92.7%	717,973	85.4%	-2%	709,260	82.1%	-2.9%
Black or African American	21,326	2.7%	72,723	8.6%	241%	95,399	11.0%	347.3%
American Indian and Alaskan Indian	2,478	0.3%	2646	0.3%	7%	2,504	0.3%	1.0%
Asian or Pacific Islander	17,021	2.2%	25,242	3.0%	48%	32,261	3.7%	89.5%
Two or More Races	13,948	1.8%	17,634	2.1%	26%	19,915	2.3%	42.8%
Some Other Race	3,106	0.4%	4,760	0.6%	53%	4,680	0.5%	50.7%
Total Population	788,149	100%	840,978	100%	N/A	864,019	100%	N/A

Source: 2000, 2010 U.S. Census; 2013-2017 American Community Survey 5-Year Estimates

Since 2000, the Hispanic Origin population has grown significantly in Macomb County. From 2000 to 2017, the County saw a 73.5% increase in the Hispanic Origin population. The state of Michigan saw a smaller increase with 49.6% in the Hispanic Origin population.

Table 2 illustrates the change in both the County's Black or African American and White populations during this period. Since 2000, Macomb County's Black or African American population increased by 347.3% and the County's White population decreased by 2.9%. The state of Michigan's Black or African American population declined by 2.7%, while the White population declined by 1.9%. The Hispanic population across all geographies dramatically increased, with an equally dramatic increase of the County's Black or African American population.

Table 3 describes the racial and ethnic distribution within the CDBG, ESG Jurisdiction (Urban County). As depicted, the data for the Urban County is reflective of that of the County as a whole. The Urban County is made up of predominantly White, Non-Hispanic population (86.3%). Black, Non-Hispanic make up 7.2% of the Urban County population, followed by 2.6% Hispanic, and 1.9% Asian or Pacific Islander.

Additionally, the distribution of White, Non-Hispanic decreased since 1990 from 95.5% to 86.3% while Black, Hispanic and Asian populations have increased since 1990.

Table 3: Macomb County CDBG, ESG Jurisdiction

Race/Ethnicity	1990		Current	
	#	%	#	%
White, Non-Hispanic	237,382	95.50%	322,585	86.3%
Black, Non-Hispanic	5,451	2.19%	27,046	7.2%
Hispanic	2,748	1.11%	9,539	2.6%
Asian or Pacific Islander, Non-Hispanic	1,778	0.72%	7,024	1.9%
Native American, Non-Hispanic	880	0.35%	1,006	0.3%
Two or More Races, Non-Hispanic	N/A		6,167	1.7%
Other, Non-Hispanic	N/A		329	0.1%
TOTAL	248,239	99.9%	373,696	100%

Source: AFFH Data and Mapping Tool, Data Updated September 29, 2017, Data Accessed April of 2019

The Black/African American Population map (Appendix A) shows the distribution of African Americans in the County. The Black or African American population is concentrated in the southern part of the County, primarily in the cities of Eastpointe, and the City of Centerline. The population is also concentrated in Mount Clemens, where the African American population is greater than 41%. The Hispanic Population map (Appendix A) shows that Hispanics are relatively evenly spread out throughout the county. The highest concentrations of Hispanic or Latino Populations are along the border of Mount Clemens and Harrison Township. Most of the municipalities in the county have less than 10% of Hispanic or Latino population. The concentration of other minority races is displayed on the Other Minority Race Population map (Appendix A). This map shows that most people who identified as Asian, American Indian or Alaska native, Native Hawaiian or Pacific Islander, or Two or more Races are concentrated along the border of Oakland County and in Shelby Township.

Table 4: Change in Race

Group	2000	2010	2017	2000-2017% Change
Macomb County				
White	730,270	717,973	844,104	15.6%
Black	21,326	72,723	95,399	347.3%
Hispanic Origin	12,435	19,095	21,575	73.5%
Michigan				
White	7,966,053	7,803,120	7,813,199	-1.9%
Black	1,412,742	1,400,362	1,374,515	-2.7%
Hispanic Origin	323,877	436,358	484,568	49.6%

Source: 2000 and 2010 U.S. Census; 2013-2017 American Community Survey 5-Year Estimates

Age

According to the 2013-2017 ACS, the population of Macomb County is relatively older with roughly 57% of its population at 35 years of age or older. The median age in Macomb County is 41 years of age. The age and gender breakdown is shown in **Table 5**.

The Households with Persons 18 Years and Under map (Appendix A) demonstrates that many households dispersed throughout the County include young people. There are higher percentages of persons under the age of 18 in Macomb Township, Chesterfield Township, the City of Centerline, and the City of Eastpointe. Each of these locations have an approximate average concentration of 30% of young people. The location of elderly persons in Macomb County does not follow a strong trend. Ray Township, Shelby Township, and Washington Township have several census tracts with high concentrations of elderly people, displaying 16% or more households with persons 65 years and older, as seen in the Population of Age 65 and Over map (Appendix A).

Table 5: Age and Gender Distribution

Age-Cohort	2000			2010			2017		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Total Population	386,088	402,061	788,149	408,712	432,266	25,793	420,439	443,580	864,019
Under 5 years	26,484	24,578	51,062	24,939	23,876	48,815	24,290	23,234	47,524
5 to 9 years	27,759	26,366	54,125	27,001	25,757	52,758	25,937	24,845	50,782
10 to 14 years	27,923	25,942	53,865	28,924	27,321	56,245	27,830	26,334	54,164
15 to 19 years	25,130	23,555	48,685	29,301	27,506	56,807	27,585	25,874	53,459
20 to 24 years	22,439	22,333	44,772	24,979	24,532	49,511	27,741	27,014	54,755
25 to 34 years	58,759	56,955	115,714	50,058	51,335	101,393	54,519	54,551	109,070
35 to 44 years	66,901	65,602	132,503	58,382	60,057	118,439	53,072	55,284	108,356
45 to 54 years	53,657	54,604	108,261	65,341	67,514	132,855	62,866	65,505	128,371
55 to 59 years	19,575	20,560	40,135	27,640	29,006	56,646	30,503	34,058	64,561
60 to 64 years	14,709	16,667	31,376	22,487	24,842	47,329	27,567	28,099	55,666
65 to 74 years	24,563	31,417	55,980	27,670	33,422	61,092	35,472	41,583	77,055
75 to 84 years	14,921	24,861	39,782	16,363	24,440	40,803	16,329	23,745	40,074
85 years and over	3,268	8,621	11,889	5,627	12,658	18,285	6,728	13,454	20,182
Median age (years)	35.7	38.3	36.9	38.6	41.1	39.9	39.4	42.5	41

Source: 2000, 2010 U.S. Census; 2013-2017 American Community Survey 5-Year Estimates

Table 6 below details the age and gender distribution within the CDBG, ESG Jurisdiction (Urban County). The data show that within the Urban County that nearly one-quarter of the population are under the age of 18, 63% are 18 years to 64 years old, and only 12.2% are 65 year or older. Additionally, according to the AFFH Data and Mapping Tool, there are 45,872 families with Children within the Urban County (45.84%). Gender distribution within the Urban County is evenly divided among male and females.

Table 6: Macomb County CDBG, ESG Jurisdiction		
Age	#	%
Under 18	92,653	24.8%
18-64	235,549	63.0%
65+	45,494	12.2%
Sex	#	%
Male	184,221	49.3%
Female	189,475	50.7%

Source: AFFH Data and Mapping Tool, Data Updated September 29, 2017, Data Accessed April of 2019

Income and Poverty

According to the 2013-2017 American Community Survey (ACS), Macomb County has a median family income of \$71,606 per year, median household income of \$58,175, with 10.9% of families falling below the federal poverty level and 11.8% of individuals falling below the federal poverty level. **Table 7** shows Macomb County has a higher median family and household income compared to the State of Michigan along with a lower poverty rate.

Table 7: Income and Poverty 2009-2017					
Place	Median Household Income	Median Family Income	Per Capita Income	% Families Below Poverty Level	% Individuals Below Poverty Level
Macomb County	\$58,175	\$71,606	\$29,740	10.9%	11.8%
Michigan	\$52,668	\$66,653	\$28,938	15.6%	15.8%

Source: 2013-2017 ACS Data

According to the 2013-2017 ACS, Macomb County reported that approximately 11.8% of individuals were living below the federal poverty level. This is 4% lower than the rate of individuals living below the poverty level for the State. The State of Michigan reported approximately 15.8% of individuals were living below the federal poverty level. **Table 8** illustrates the breakdown between race and poverty level in Macomb County, according to the 2013-2017 ACS, provided by the U.S. Census Bureau. American Indians and Alaska Natives, and Black or African Americans share highest percentage rate of persons living below the federal poverty level at 23.3% each; this is closely followed by populations of some other race not listed at 20%. Hispanic or Latino persons living below the federal poverty rate in the County is at 12.4%, while those who identify as two or more races is at 17%.

The southern part of the County shows a greater rate of poverty as seen in the Poverty Status map (Appendix A). The City of Mount Clemens (and the area immediately surrounding it), the City of Centerline, and the City of Eastpointe have the highest rate of people whose income in the past 12 months is below the poverty level with census tracts registering a poverty rate 21% or higher. The same regions that displayed the highest levels of poverty in the Poverty Status map are also the places with the higher percentages of poverty on the Poverty Status for Minority Populations map (Appendix A). This suggests that while most of the county does not suffer from poverty, those who suffer the most are minority populations.

The Low- and Moderate-Income Persons map (Appendix A), indicates that the highest concentrations of low- and moderate-income persons are concentrated to the southern part of the County. A low- and moderate-income person earns less than 80% of the Area Median Income (AMI). As an “Exception Grantee,” Macomb County reviews statistical information on an annual basis for all areas that have been determined to have at least 49.57% of its population with low and moderate incomes (80% of the Area Median Income). Currently there are 62 Block Groups that meet or exceed these criteria in the Urban County. An additional 127 low- and moderate-income block groups reside in Entitlement Cities and Townships within Macomb County.

These identified areas are mainly concentrated south of M-59 in the southern part of the County. Some low- and moderate-income areas are scattered throughout the County north of M-59. Generally speaking, these same neighborhoods have the highest percentage of minority populations in the County.

The low- and moderate-income areas are in areas consistent with areas that have higher poverty rates and a higher percentage of minority populations.

Table 8: Race and Poverty		
Race and Hispanic Origin	Below Poverty Level	Percent Below Poverty Level
One Race	168,734	22.3%
White	70,046	10.0%
Black or African American	21,782	23.3%
American Indian and Alaska Native	567	23.3%
Asian	4,408	13.8%
Native Hawaiian and Other Pacific Islander	33	9.3%
Some Other Race	934	20.0%
Two or More Races	3,326	17.0%
Hispanic or Latino Origin	2,661	12.4%
White Alone, Not Hispanic or Latino	68,303	9.9%

Source: 2013-2017 American Community Survey 5-Year Estimates

Opportunity Indicators, by Race/Ethnicity

An opportunity analysis promotes the purposes of the Fair Housing Act, as described in the legislative history and reflected in the statute and regulations. As Congress was working to pass the Fair Housing Act, Senator Phillip Hart emphasized the relationship between housing and opportunity stating, “where a family lives, where it is allowed to live is inextricably bound up with better education, better jobs, economic motivation, and good living conditions”.

Because housing is part of a community, an important component of fair housing planning is to assess how a person’s place of residence, public and private investment choices, and state and local policies relating to schools, transportation, employment, environmental health, and community development affect access to opportunity, and which individuals and groups with protected characteristics are most affected by a lack of, or inability to access, opportunity.

Addressing disparities in access to opportunity may involve a balanced approach that provides for both strategic investments in areas that lack key opportunity indicators, and also works to open up housing opportunities in areas with existing opportunity through effective mobility options and the preservation and development of affordable housing in high opportunity areas.

Table 9 shows opportunity indicators by race/ethnicity. Of the general population, the Black or African American population in Macomb County has less access to low poverty areas than other race/ethnicity groups. When poverty level is considered, again the Black or African American population below poverty level has the least access to low poverty areas when compared to other race/ethnicity groups.

School-related policies have the potential to limit school choice or create situations where students living in concentrated areas of poverty are assigned to a less proficient school because of geography. Such situations could limit access to learning opportunities. **Table 9** shows opportunity indicators by race/ethnicity. Of the general population, the Black or African American population in Macomb County has less access to proficient schools than other race/ethnicity groups. When poverty level is considered, again the Black or African American population below poverty level has the least access to proficient schools when compared to other race/ethnicity groups.

Table 9 shows, the Asian or Pacific Islander populations in Macomb County have less access to proximate jobs while the Black or African American population has less access to the labor market than other race/ethnicity groups. When poverty level is considered, the Black or African American population below poverty level has the least access to the labor market when compared to other race/ethnicity groups.

Table 9 - Opportunity Indicators, by Race/Ethnicity

(Macomb County, MI CDBG, ESG) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	65.24	67.94	50.81	25.68	42.86	49.04	64.27
Black, Non-Hispanic	41.75	44.91	34.35	29.23	51.35	50.67	52.88
Hispanic	58.12	63.86	45.98	27.01	45.87	52.72	63.06
Asian or Pacific Islander, Non-Hispanic	66.85	69.79	55.07	27.70	44.72	47.77	62.69
Native American, Non-Hispanic	58.96	63.33	44.64	26.00	44.92	51.15	61.49
Population below federal poverty line							
White, Non-Hispanic	54.14	61.79	43.29	26.94	47.68	51.89	60.56
Black, Non-Hispanic	31.42	35.59	25.46	29.82	55.22	51.57	49.08
Hispanic	35.23	56.81	30.74	28.02	47.68	59.44	59.89
Asian or Pacific Islander, Non-Hispanic	42.18	53.82	42.71	28.45	51.66	45.10	60.70
Native American, Non-Hispanic	71.52	67.74	49.87	25.88	38.35	58.30	69.14

Source: AFFH Data and Mapping Tool, Data Updated September 29, 2017, Data Accessed April of 2019

Table 9 shows opportunity indicators by race/ethnicity related to Environmental Health. Of the general population, the Black or African American population in Macomb County has the least access to environmentally healthy neighborhoods than other race/ethnicity groups. When poverty level is considered, again the Black or African American population below poverty level has the least access to environmentally healthy neighborhoods when compared to other race/ethnicity groups.

According to the AFFH Data and Mapping Tool (data accessed in May of 2019), in the Urban County Area there are no Census Tracts that qualify as a R/ECAP. Census Tract 2640, which resides within the southern part of the City of Warren, is the only Census Tract in Macomb County that meets the HUD definition of R/ECAP. The City of Warren does not fall within the Macomb County CDBG entitlement because it receives its own allocation of funds.

Education

The correlation between education, employment and income, while not necessarily a Fair Housing matter, does affect housing choice. **Table 10** illustrates the educational attainment for Macomb County and for the State of Michigan. According to the 2013-2017 ACS, 6.9% of persons in Macomb County have between a 9th and 12th grade education, with no diploma. This figure is slightly higher than the rate for the State of Michigan at 6.7%. Additionally, Macomb County shows a lower percentage of persons who have a bachelor's degree, graduate degree, or professional degree compared the State of Michigan. Macomb County has a higher percentage of those who have a high school diploma and those who completed some college, but do not have a degree.

Table 10: Educational Attainment, 2017 - Population 25 years and older

Jurisdiction	Less than 9th grade	9th to 12th grade, no diploma	High School Graduate (including equivalency)	Some college, no degree	Associate Degree	Percent Bachelor's Degree	Graduate or Professional Degree	Percent High School graduate or Higher	Percent Bachelor's Degree of Higher
Macomb County	3.8%	6.9%	29.9%	24.6%	10.6%	15.9%	8.3%	89.3%	24.2%
Michigan	3.0%	6.7%	29.3%	23.6%	9.3%	17.1%	11.0%	90.2%	28.1%

Source: 2013-2017 American Community Survey 5-Year Estimates

Limited English Proficiency (LEP) and Linguistic Isolation

An individual who does not speak English as their primary language can be limited English proficient, or “LEP”. The native language of those individuals is often referred to as a LEP Language. According to the AFFH Data and Mapping Tool, in Macomb County Urban County 3.8% of the population is considered to be limited English proficient. This is a slight increase from 3.09% in 2000. The most common LEP Languages are Spanish (.67%), Other Indo-European Language (.51%) and Italian (.50%).

Approximately 10,745 households or 3.1% of Macomb County’s total population are linguistically isolated. The U.S. Census defines “Linguistically Isolated” as all members of the household 14 years and older having at least some difficulty speaking English in the household. Macomb County has a greater percentage of linguistically isolated households than the State of Michigan, as shown in **Table 11**. Given that the Hispanic population of Macomb County has been one of the fastest growing segments of the population, linguistic isolation could be a more common issue in the future if trends continue.

Table 11: Linguistic Isolation

Jurisdiction	Total Households	Total English Speaking Households	Total Spanish Speaking Households	Linguistically Isolated	Russian, Polish, or other Slavic Language Households	Linguistically Isolated	Total Other Indo-European Speaking Languages	Linguistically Isolated	Total Asian and Pacific Speaking Households	Linguistically Isolated	Total Arabic Speaking Households	Linguistically Isolated	Total Other Speaking Languages Households	Linguistically Isolated	Total Linguistically Isolated Households	Total Percent of Linguistically Isolated Households
Macomb County	346,457	295,152	5,512	372	8,208	2675	12,509	1,741	7,280	1,023	9,129	3,039	8,667	1,895	10,745	3.10%
Michigan	3,930,017	3,521,557	124,591	16,526	30,797	6,253	63,242	6,607	72,135	14,889	52,492	12,462	65,203	6,393	63,130	1.61%

Source: 2017 ACS Data

Disability

According to the 2013-2017 ACS 5-Year Estimates, disabilities are categorized into six types: hearing difficulty, vision difficulty, cognitive ability, ambulatory difficulty, self-care difficulty, and independent

living difficulty. According to the 2013-2017 ACS 5-Year Estimates, approximately 120,096 or 14% of people in Macomb County reported having a disability. The majority (61,641 people or 51.3%) of this population is between 18 and 64 years of age.

Physically disabled persons are those having an impairment which impedes their ability to function independently. According to the 2013-2017 ACS 5-Year Estimates, the adult population between the ages of 18 and 64 is 536,078. Persons who have a physical disability may suffer from a hearing difficulty, vision difficulty, or an ambulatory difficulty. According to the same ACS dataset, there are approximately 53,517 adults (9.9%) between the ages of 18 and 64 who have a physical disability. These persons may also have a cognitive, self-care, and independent living impairment as well, and are also included in the developmentally disabled count.

The American Community Survey (ACS) defines disability as a long-lasting physical, mental, or emotional condition. Persons who have a developmental disability may suffer from a cognitive difficulty, a self-care difficulty, or an independent living difficulty. According to the ACS, this condition can make it difficult for a person to do activities such as walking, climbing stairs, dressing, bathing, learning, or remembering. This condition can also impede a person from being able to go outside the home or to work at a job or place of business. According to the ACS, 63,709 persons, or 11.8% of people, between the ages of 18 and 64 years have a developmental disability. These persons may also have a hearing, vision, and ambulatory impairment as well, and are also included in the physically disabled count.

The Disability Status map (Appendix A) shows the distribution of persons with a physical or developmental disability in the County. The population of disabled persons is not concentrated in a particular region of the county, but the map shows higher percentages of disabled persons in Ray township, the City of Mount Clemens, and the City of Eastpointe.

Table 12 shows disabilities by type in the Urban County of Macomb. The three most prevalent disability types in the Urban County are ambulatory difficulty (6.5%), cognitive difficulty (4.9%), and independent living difficulty (4.8%). Other disability types represented include hearing difficulty (3.1%), self-care difficulty (2.5%), and vision difficulty (1.6%). When compared to the County as a whole, the Urban County area has comparative percentages of persons with a disability of all types.

Table 12 - Disability by Type		
(Macomb County, MI CDBG, ESG) Jurisdiction		
Disability Type	#	%
Hearing difficulty	10,914	3.1%
Vision difficulty	5,597	1.6%
Cognitive difficulty	17,341	4.9%
Ambulatory difficulty	22,884	6.5%
Self-care difficulty	8,878	2.5%
Independent living difficulty	16,816	4.8%

Source: AFFH Data and Mapping Tool, Data Updated September 29, 2017, Data Accessed April of 2019

National Origin

According to the AFFH Data and Mapping Tool, in Macomb County Urban County, the most common countries of National Origin, outside of the United States of America, are Iraq (0.83%), Italy (0.76%), Canada (0.63%), India (0.57%), and Albania (0.55%).

2.2 HOUSING PROFILE

Housing Inventory

According to the 2000 U.S. Census, there were a total of 320,276 housing units in Macomb County, 309,203 or approximately 96% of the units were occupied while 5.9% or 11,073 of the units were vacant. However, according to the 2013-2017 ACS, there were a total of 362,764 housing units in Macomb County, 341,532, or approximately 94% of these units were occupied. Traditionally, residential vacancy rates have been used as an indicator of equilibrium between supply and demand in a given housing market. **Table 13** illustrates the Housing Tenure in 2000 and 2017.

Table 13: Housing Tenure				
Housing Tenure	Census 2000	Census 2010	ACS 2017	Change 2000-2017
Owner Occupied	243,964	261,291	248,844	4,880
Renter Occupied	65,239	69,031	92,688	27,449
Vacant	11,073	25,205	21,232	10,159
Homeowner Vacancy Rate	1.2%	2.5%	1.2%	0.0%
Rental Vacancy Rate	4.7%	7.7%	4.3%	-0.4%
Total Housing Units	320,276	355,527	362,764	42,488

Source: 2000, 2010 U.S. Census; 2013-2017 American Community Survey 5-Year Estimates

As shown in **Table 13**, Macomb County reported a total of 341,532 occupied housing units. Of 341,532 occupied housing units, 248,844 housing units were owner occupied. Similarly, 92,688 units were renter

occupied. The vast majority of owner-occupied housing units within the County are single-family detached units (approximately 84%). Similarly, most renter-occupied housing units within the County are single-family detached units (approximately 32%) and is closely followed by units with 10 or more apartments (approximately 26%).

The percent of rental units by Census Tract can be seen on the Rental Units map (Appendix A). Municipalities in the southern half of the county show the greatest percentage of renter-occupied housing units, with most municipalities displaying areas with percentages as great as 51% or higher. This is also the area with a high number of low- and moderate-income households, suggesting that homeownership is not a viable option for some residents of this area.

Table 14: Physical Housing Characteristics for Occupied Housing Units

Occupied Housing Units	Percent of Occupied Housing Units	Owner Occupied Housing Units	Renter-Occupied Housing Units
Units in Structure	362,764	248,844	92,688
1, detached	65.5%	208,372	29,160
1, attached	9.2%	24,064	9,457
2 apartments	0.6%	701	1,648
3 or 4 apartments	2.4%	2,289	6,484
5 to 9 apartments	6.0%	2,415	19,236
10 or more apartments	7.2%	2,230	23,790
Mobile Home or other type of housing	3.2%	8,773	2,913

Source: 2013-2017 American Community Survey 5-Year Estimates

Age of Structure

The age of a dwelling unit is a factor used to evaluate the structural quality of the unit. The average industry standard for the life span of a single-family dwelling is generally 50 years. However, this typical life span often depends on the quality of the original construction and continued maintenance of the unit. Using this standard, some homes found within the County constructed prior to 1960 may be approaching the end of their utility.

Table 15 identifies the age of year-round residential structures. Evidently, the majority of the units in Macomb County were built from 1939 or earlier to 1979. This is typical of many regions nationwide as the United States experienced a housing boom that began after World War II.

When considering the average life span of a dwelling unit, the homes built before 1960 will have already reached their 50-year old life span. Thus, over 27% of the County’s housing units have reached their life span. These homes require regular maintenance to remain structurally sound.

In **Table 15**, only 2%, or 6,451 housing units were built since 2010. The primary reason for a decrease in construction of new homes in the City is the potential redevelopment of older residential structures. Most of the City's future population will be served by existing residential units, redevelopment of existing units, and infill housing.

Table 15: Age of Housing Units		
Macomb County	Number of Total Housing Units	Percent of Total Housing Units
Year Built		
Total Housing Units	362,764	100%
Built 2014 or Later	1,802	0%
Built 2010 to 2013	4,649	1.3%
Built 2000 to 2009	41,633	11.5%
Built 1990 to 1999	51,606	14.2%
Built 1980 to 1989	41,382	11.4%
Built 1970 to 1979	62,369	17.2%
Built 1960 to 1969	61,287	16.9%
Built 1950 to 1959	63,404	17.5%
Built 1940 to 1949	17,821	4.9%
Built 1939 or earlier	16,811	4.6%

Source: 2013-2017 American Community Survey 5-Year Estimates

Risk of Lead-Based Paint

The risk of lead-based paint hazards within Macomb County is estimated in **Table 16**. Because the actual number of housing units in the County with lead-based paint is not available, an assumption must be made. For the purposes of this plan, a housing unit built before 1980 is presumed to have a higher risk of lead-based paint. Therefore, **Table 16** shows the total number of owner-occupied and renter-occupied units that were built before 1980, as well as those built before 1980 with children present. The data for **Table 16** is from the 2013-2017 ACS and 2009-2013 CHAS provided by HUD.

As shown in **Table 16**, 98,962 or 52% of owner-occupied housing units in the County were built prior to 1980, of which only 17,651 units or 9% were built before 1980 and have children present. For renter-occupied housing units, 35,365 units or 57% were built prior to 1980, while 13,421 or 22% were built prior to 1980 and have children present.

Table 16: Risk of Lead-Based Paint Hazard				
Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	98,962	52%	35,365	57%
Housing Units built before 1980 with children present	17,651	9%	13,421	22%

Source: 2013-2017 ACS (Total Units), 2009-2013 CHAS (Units with Children)

Number of Households and Types

Table 17 below provides the number and type of households by Area Median Income (AMI). As the data identifies below, the largest number of households are in the greater than 100% AMI group, with 129,144 households. The second largest group is the 50-80% AMI group (42,305). This means that approximately 38% of all households in Macomb County are below 80% of AMI. The remaining income groups in Macomb County contain a similar number of households.

Small family households are households that have a family with two to four members. The largest number of small family households reside in the >100% AMI group (72,679). The majority of the remaining income groups have a relatively even distribution of the number of small family households.

Large family households are households with families with five or more members. Among the income groups below 80% AMI, the 50-80% AMI group contains the largest number of large family households at 3,269. The smallest number of large family households belongs to the 0-30% AMI group.

Table 17 also provides data on households that contain at least one person considered to be elderly. The data reveals that among income groups below 80% AMI, the largest number of households containing a person over the age of 62 is within the 50-80% AMI group(9,637), followed by the income group that falls between 30%-50% AMI at 5,593 households. In addition, the households between 50%-80% AMI also contain the largest number of households containing a person 75 years or older with 8,145 households.

Finally, data provided in **Table 17** illustrates the number of households with one or more children 6 years old or younger. Among the household income groups identified, the largest number of children 6 years or younger reside in homes above 100% AMI (12,625). The second largest number of households with children 6 years old or younger is within the 50-80% AMI group (5,950).

Table 17: Number of Households					
	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households*	26,490	27,980	42,305	26,855	129,144
Small Family Households*	9,308	8,693	14,574	10,770	72,679
Large Family Households*	1,874	2,135	3,269	2,053	13,505
Household contains at least one person 62-74 Years of Age	4,809	5,593	9,637	6,648	23,715
Household contains at least one-person age 75 or older	3,904	6,712	8,145	3,525	7,749
Households with one or more children 6 years old or younger	4,649	4,111	5,950	3,380	12,625

* The highest income category for these family types is >80% HAMFI; Source: HUD IDIS Output, February 2019: 2009-2013 CHAS

Housing Problems

Table 18 displays the number of households with housing problems by tenure and AMI. As shown in **Table 18**, among the “housing problem” categories, households within Macomb County are most commonly impacted by severe housing cost burden (greater than 50% of income) and housing cost burden (greater than 30% of income).

Housing Problem categories are defined below:

- “Substandard Housing – lacking complete plumbing or kitchen facilities” is defined as a household without hot and cold piped water, a flush toilet and a bathtub or shower, and kitchen facilities that lack a sink with piped water, a range or stove, or a refrigerator. **Table 18** identifies 626 renter households and 652 owner households who live in substandard housing.
- The second housing problem identified is households living in overcrowded conditions. There are two forms of overcrowding defined by HUD:
 1. Severely overcrowded is defined as a household having complete kitchens and bathrooms but housing more than 1.51 persons per room excluding bathrooms, porches, foyers, halls, or half-rooms.
 2. Overcrowded is defined as a household having complete kitchens and bathrooms but housing more than 1.01 to 1.5 persons per room excluding bathrooms, porches, foyers, halls, or half-rooms
- The final housing problem identified is cost burden. Cost burden is a fraction of a household’s total gross income spent on housing costs. For renters, housing costs include rent paid by the tenant plus utilities. For owners, housing costs include mortgage payment, taxes, insurance, and utilities. Cost burden is broken into two categories based on severity:
 1. Severe housing cost burden greater than 50% of income
 2. Housing cost burden greater than 30% of income

As shown in **Table 18**, 1,602 renter households are experiencing some form of overcrowding while 995 owner occupied households are experiencing some form of overcrowding.

As shown in **Table 18**, households tenured by renters within the 0%-30% AMI group are experiencing higher rates of cost burden than those households with higher incomes, and households tenured by owners within the >50-80% AMI income group are experiencing higher rates of cost burden than renters in the same income bracket.

Renters and owners appear to be unequally affected by the cost of housing within Macomb County. Of the 67,382 households experiencing some level of cost burden, only 27,189 (40%) are renters whereas 40,193 (60%) are owners.

Table 18: Housing Problems										
Housing Problems	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Substandard Housing - Lacking complete plumbing or kitchen facilities	260	120	167	79	626	69	79	314	190	652
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	80	140	74	4	298	10	19	39	10	78
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	375	394	295	240	1,304	49	300	363	205	917
Housing cost burden greater than 50% of income (and none of the above problems)	9,259	3,855	1,089	49	14,252	8,343	5,960	4,635	914	19,852
Housing cost burden greater than 30% of income (and none of the above problems)	1,335	5,394	5,238	970	12,937	1,620	4,913	8,435	5,373	20,341
Zero/negative Income (and none of the above problems)	1,099	0	0	0	1,099	1,242	0	0	0	1,242

Source: HUD IDIS Output, February 2019: 2009-2013 CHAS

Additional Housing Problems

Table 19 displays the number of households with no housing problems, one or more housing problems, and negative income by tenure and HUD Adjusted Median Family Income (HAMFI). The data source is the 2009-2013 Comprehensive Housing Affordability Strategy (CHAS) data developed by HUD.

As the data reveals in **Table 19**, renters in the 0-30% AMI group experience the highest rate of one or more of the housing problems identified. A total of 9,970 renter households below 30% AMI experience some form of housing problem. Among owner households, the 0-30% AMI group has the highest number of households (8,463) with one or more of housing problems.

Additionally, a small number of households (2,341) within the 0-30% AMI group have negative income but have none of the other four identified housing problems.

Table 19: Additional Housing Problems										
	RENTER					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	80-100% AMI	TOTAL	0-30% AMI	>30-50% AMI	>50-80% AMI	80-100% AMI	TOTAL
Number of Households										
Having 1 or more of four housing problems	9,970	4,505	1,638	374	16,487	8,463	6,355	5,359	1,320	21,497
Having none of four housing problems	3,580	7,403	12,149	6,302	29,434	2,165	9,729	23,165	18,835	53,894
Household has negative income, but none of the other housing problems	1,099	0	0	0	1,099	1,242	0	0	0	1,242

Note: Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden
Source: HUD IDIS Output, February 2019: 2009-2013 CHAS

Cost Burden > 30% and > 50%

Tables 20 and **21** display the number of households with housing cost burdens more than 30% of income and more than 50% of income, respectively, by household type, tenancy, and household income (expressed as a percentage of AMI). Households are broken into four categories:

- Small related – Family households with two to four related members
- Large related – Family households with five or more related members
- Elderly – A household whose head, spouse, or sole member is a person who is at least 62 years of age
- Other – All other households

As shown in **Table 20**, the category experiencing the most significant cost burden greater than 30% of income are households defined as “Small Related”. Approximately 23,159 of the “Small Related” households have a cost burden greater than 30% of income. The burden is nearly even among renters (11,107) and owners (12,052).

For renter households, the 0% - 30% AMI Income group has the highest total number of households with a cost burden greater than 30% of income with 11,175 households. Among owner households, the 50% - 80% AMI group has the highest total number of households with a cost burden greater than 30% of income with 13,281 households.

Table 20: Cost Burden > 30%								
	RENTER				OWNER			
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	TOTAL	0-30% AMI	>30- 50% AMI	>50- 80% AMI	TOTAL
Number of Households								
Small Related	4,806	3,852	2,449	11,107	3,157	3,491	5,404	12,052
Large Related	784	724	314	1,822	825	944	1,513	3,282
Elderly	2,094	2,258	1,758	6,110	4,154	4,557	4,003	12,714
Other	3,491	2,857	1,949	8,297	1,927	2,024	2,361	6,312
Total Need by Income	11,175	9,691	6,470	27,336	10,063	11,016	13,281	34,360

HUD IDIS Output, February 2019: 2009-2013 CHAS

As shown in **Table 21**, the category most commonly experiencing severe cost burden greater than 50% of income are households defined as “Small Related”. Approximately 13,146 of the “Small Related” households experience a cost burden greater than 50% of income. The burden is nearly even among renters (6,212) and owners (6,934).

For renter households, the 0% - 30% AMI Income group has the highest total number of households with a cost burden greater than 50% of income with 9,738 households. Among owner households, again, the 0% - 30% AMI group has the highest total number of households with a cost burden greater than 50% of income (8,408 households).

Table 21: Cost Burden > 50%								
	RENTER				Owner			
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	TOTAL	0-30% AMI	>30- 50% AMI	>50- 80% AMI	TOTAL
Number of Households								
Small Related	4,427	1,540	245	6,212	2,822	2,293	1,819	6,934
Large Related	669	299	70	1,038	725	619	614	1,958
Elderly	1,526	1,084	629	3,239	3,219	1,803	1,343	6,365
Other	3,116	1,090	190	4,396	1,642	1,335	942	3,919
Total Need by Income	9,738	4,013	1,134	14,885	8,408	6,050	4,718	19,176

HUD IDIS Output, February 2019: 2009-2013 CHAS

Crowding

Table 22 displays the number of households that are overcrowded, defined as households with more than one person per room, excluding bathrooms, porches, foyers, halls, or half-rooms. The data is displayed by household type, tenancy, and household income (expressed as a percentage of AMI).

As shown in **Table 22**, overcrowding is unequally distributed among single family households (1,991) and multiple, unrelated family households (574).

When accounting for income, renter households in the >30-50% AMI experience the highest number of crowding with 549 households. Among renters, issues with crowding tends to decrease as income increases.

Among owner-occupied households, the households with incomes between 50% and 80% AMI are the only group with significant crowding issues (416).

Table 22: Crowding										
	RENTER					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	80-100% AMI	TOTAL	0-30% AMI	>30-50% AMI	>50-80% AMI	80-100% AMI	TOTAL
Type of Households	Number of Households									
Single Family Households	425	369	275	224	1,293	55	159	304	180	698
Multiple, Unrelated Family Households	45	125	89	10	269	4	154	112	35	305
Other, Non-Family Households	49	55	10	10	124	0	0	0	0	0
Total Need by Income	519	549	374	244	1,686	59	313	416	215	1,003

*Note: Crowding is more than one person per room
HUD IDIS Output, February 2019: 2009-2013 CHAS*

Disproportionately Greater Needs: Housing Problems

A disproportionately greater need exists when the members of racial or ethnic group at a certain income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole. For example, assume that 60% of all low-income households within a jurisdiction have a housing problem and 70% of low-income Hispanic households have a housing problem. In this case, low-income Hispanic households have a disproportionately greater need. Per the regulations at 91.205(b)(2), 91.305(b)(2), and 91.405, a grantee must provide an assessment for each disproportionately greater need identified. Although the purpose of this assessment is to analyze the relative level of need for each race and ethnic category, the data also provide information for the jurisdiction as a whole that can be useful in describing overall need.

This section has four tables that capture the number of housing problems by income, race, and ethnicity. Each table provides data for a different income level (0–30%, 30–50%, 50–80%, and 80–100% AMI).

0% - 30% of Areas Median Income

Of all the income levels within Macomb County, households within the 0%-30% AMI category have the highest number of households with one or more of four housing problems (21,373 households). As shown in **Table 23**, when considering race, White and Black/African American households have the highest number of households with housing problems with 16,193 and 3,842 households, respectively.

In terms of disproportionate need, the American Indian, Alaska Native (100%) and Hispanic (95.8%) racial or ethnic groups have a rate of housing problems that is 10 percentage points higher than the jurisdiction as a whole.

Table 23: 0% - 30% of Area Median Income

Race	Has one or more of four housing problems		Has none of the four housing problems		Household has no/negative income, but none of the other housing problems		Total Households
	Total	% of Total	Total	% of Total	Total	% of Total	
Jurisdiction as a whole	21,373	80.6%	2,788	10.5%	2,341	8.8%	26,502
White	16,193	80.7%	2,078	10.4%	1,784	8.9%	20,055
Black/African American	3,842	79.4%	639	13.2%	359	7.4%	4,840
Asian	420	80.0%	45	8.6%	60	11.4%	525
American Indian, Alaska Native	19	100.0%	0	0.0%	0	0.0%	19
Pacific Islander	0	0.0%	0	0.0%	0	0.0%	0
Hispanic	547	95.8%	0	0.0%	24	4.2%	571

Source: HUD IDIS Output, February 2019: 2009-2013 CHAS

*The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

30% - 50% of Areas Median Income

Of all the income levels within Macomb County, households within the 30%-50% AMI category have the second highest number of households with one or more of four housing problems (21,180 households), closely following the 0-30% AMI income category. As shown in **Table 24**, when considering race, White and Black/African American households have the highest number of households with housing problems with 16,630 and 2,965 households, respectively.

In terms of disproportionate need, the Black/African American (90.6%) and Hispanic (91.2%) racial or ethnic groups have a rate of housing problems that is 10 percentage points higher than the jurisdiction as a whole.

Table 24: 30% - 50% of Area Median Income

Race	Has one or more of four housing problems		Has none of the four housing problems		Household has no/negative income, but none of the other housing problems		Total Households
	Total	% of Total	Total	% of Total	Total	% of Total	
Jurisdiction as a whole	21,180	75.7%	6,812	24.3%	0	0.0%	27,992
White	16,630	73.0%	6,157	27.0%	0	0.0%	22,787
Black/African American	2,965	90.6%	307	9.4%	0	0.0%	3,272
Asian	380	78.5%	104	21.5%	0	0.0%	484
American Indian, Alaska Native	89	51.4%	84	48.6%	0	0.0%	173
Pacific Islander	0	0.0%	0	0.0%	0	0.0%	0
Hispanic	734	91.2%	71	8.8%	0	0.0%	805

Source: HUD IDIS Output, February 2019: 2009-2013 CHAS

*The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

50% - 80% of Areas Median Income

Of all the income levels within Macomb County, households within the 50%-80% AMI category have the third highest number of households with one or more of four housing problems (20,639 households). As shown in **Table 25**, when considering race, White and Black/African American households have the highest number of households with housing problems with 17,003 and 2,965 households, respectively.

In terms of disproportionate need, the American Indian, Alaska Native (65.2%) racial group has a rate of housing problems that is 10 percentage points higher than the jurisdiction as a whole.

Table 25: 50% - 80% of Area Median Income

Race	Has one or more of four housing problems		Has none of the four housing problems		Household has no/negative income, but none of the other housing problems		Total Households
	Total	% of Total	Total	% of Total	Total	% of Total	
Jurisdiction as a whole	20,639	48.8%	21,668	51.2%	0	0.0%	42,307
White	17,003	47.9%	18,468	52.1%	0	0.0%	35,471
Black/African American	2,655	55.0%	2,170	45.0%	0	0.0%	4,825
Asian	288	50.3%	284	49.7%	0	0.0%	572
American Indian, Alaska Native	75	65.2%	40	34.8%	0	0.0%	115
Pacific Islander	0	0.0%	40	100.0%	0	0.0%	40
Hispanic	299	39.6%	457	60.4%	0	0.0%	756

Source:

HUD IDIS Output, February 2019: 2009-2013 CHAS

*The four housing problems are:

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

80% - 100% of Areas Median Income

Of all the income levels within Macomb County, households within the 80%-100% AMI category have the lowest number of households with one or more of four housing problems (8,038 households). As shown in **Table 26**, when considering race, White and Black/African American households have the highest number of households with housing problems with 6,893 and 729 households, respectively.

In terms of disproportionate need, the American Indian, Alaska Native (61.2%) racial group has a rate of housing problems that is 10 percentage points higher than the jurisdiction as a whole.

Table 26: 80% - 100% of Area Median Income

Race	Has one or more of four housing problems		Has none of the four housing problems		Household has no/negative income, but none of the other housing problems		Total Households
	Total	% of Total	Total	% of Total	Total	% of Total	
Jurisdiction as a whole	8,038	29.9%	18,807	70.1%	0	0.0%	26,845
White	6,893	29.8%	16,257	70.2%	0	0.0%	23,150
Black/African American	729	34.5%	1,384	65.5%	0	0.0%	2,113
Asian	87	18.1%	393	81.9%	0	0.0%	480
American Indian, Alaska Native	30	61.2%	19	38.8%	0	0.0%	49
Pacific Islander	0	0.0%	85	100.0%	0	0.0%	85
Hispanic	125	20.5%	484	79.5%	0	0.0%	609

Source:

HUD IDIS Output, February 2019: 2009-2013 CHAS

*The four housing problems are:

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

Summary of Housing Problems by AMI and Race

Of all households in the 0%-30% AMI category, 80.6% have one or more of four housing problems. In terms of disproportionate need, the American Indian, Alaska Native racial group (100%), and Hispanic ethnic group (95.8%) have a rate of housing problems that is 10 percentage points higher than the jurisdiction as a whole.

Of all households in the 30%-50% AMI category, 75.7% have one or more of four housing problems. In terms of disproportionate need, the Black/African American racial group (90.6%), and Hispanic ethnic group (91.2%) have rates of housing problems that are 10 percentage points higher than the jurisdiction as a whole.

Of all households in the 50%-80% AMI category, 48.8% have one or more of four housing problems. In terms of disproportionate need, the American Indian, Alaska Native racial group (65.2%) has rates of housing problems that are 10 percentage points higher than the jurisdiction as a whole.

Of all households in the 80%-100% AMI category, 29.9% have one or more of four housing problems. In terms of disproportionate need, the American Indian, Alaska Native racial group (61.2%) has rates of housing problems that are 10 percentage points higher than the jurisdiction as a whole.

Disproportionately Greater Need: Severe Housing Problems

As noted in the previous section, a disproportionately greater need exists when the members of racial or ethnic group at an income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole.

Severe housing problems include:

- Severely overcrowded households with more than 1.5 persons per room, not including bathrooms, porches, foyers, halls, or half-rooms
- Households with severe cost burden of more than 50% of income

This section has four Tables that capture the number of severe housing problems by income, race, and ethnicity. Each Table provides data for a different income level (0–30%, 30–50%, 50–80%, and 80–100% AMI). The Default Data Source is the Comprehensive Housing Affordability Strategy (CHAS) data developed by HUD.

0% - 30% of Areas Median Income

Of all the income levels within Macomb County households within the 0%-30% AMI category have the highest number of households experiencing severe housing problems (18,433 households). As shown in **Table 27**, when considering race, White and Black/African American households have the highest number of households with severe housing problems with 13,753 and 3,617 households, respectively.

In terms of disproportionate need, the Hispanic (85.5%) ethnic group has a rate of housing problems that is 10 percentage points higher than the jurisdiction as a whole.

Table 27: 0% - 30% of Area Median Income

Race	Has one or more of four housing problems		Has none of the four housing problems		Household has no/negative income, but none of the other housing problems		Total Households
	Total	% of Total	Total	% of Total	Total	% of Total	
Jurisdiction as a whole	18,433	69.5%	5,745	21.7%	2,341	8.8%	26,519
White	13,753	68.4%	4,560	22.7%	1,784	8.9%	20,097
Black/African American	3,617	74.8%	860	17.8%	359	7.4%	4,836
Asian	365	68.9%	105	19.8%	60	11.3%	530
American Indian, Alaska Native	4	21.1%	15	78.9%	0	0.0%	19
Pacific Islander	0	0.0%	0	0.0%	0	0.0%	0
Hispanic	483	85.5%	58	10.3%	24	4.2%	565

Source:

HUD IDIS Output, February 2019: 2009-2013 ACS Data

**The four severe housing problems*

are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room,
4. Cost Burden over 50%

30% - 50% of Areas Median Income

Of all the income levels within Macomb County, households within the 30%-50% AMI category have the second highest number of households experiencing severe housing problems (10,860 households). As shown in **Table 28**, when considering race, White and Black/African American households have the

highest number of households with severe housing problems with 8,510 and 1,459 households, respectively.

In terms of disproportionate need, the Asian racial group (52.4%) has a rate of housing problems that is 10 percentage points higher than the jurisdiction as a whole.

Table 28: 30% - 50% of Area Median Income

Race	Has one or more of four housing problems		Has none of the four housing problems		Household has no/negative income, but none of the other housing problems		Total Households
	Total	% of Total	Total	% of Total	Total	% of Total	
Jurisdiction as a whole	10,860	38.8%	17,132	61.2%	0	0.0%	27,992
White	8,510	37.4%	14,272	62.6%	0	0.0%	22,782
Black/African American	1,459	44.6%	1,814	55.4%	0	0.0%	3,273
Asian	253	52.4%	230	47.6%	0	0.0%	483
American Indian, Alaska Native	49	28.3%	124	71.7%	0	0.0%	173
Pacific Islander	0	0.0%	0	0.0%	0	0.0%	0
Hispanic	389	48.3%	417	51.7%	0	0.0%	806

Source:

HUD IDIS Output, February 2019: 2009-2013 ACS Data

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

50% - 80% of Areas Median Income

Of all the income levels within Macomb County, households within the 50%-80% AMI category have the third highest number of households experiencing severe housing problems (6,997 households). As shown in **Table 29**, when considering race, White and Black/African American households have the highest number of households with severe housing problems with 6,027 and 564 households, respectively.

In terms of disproportionate need, the Asian racial group (28.2%) has a rate of housing problems that is 10 percentage points higher than the jurisdiction as a whole.

Table 29: 50% - 80% of Area Median Income

Race	Has one or more of four housing problems		Has none of the four housing problems		Household has no/negative income, but none of the other housing problems		Total Households
	Total	% of Total	Total	% of Total	Total	% of Total	
Jurisdiction as a whole	6,997	16.5%	35,314	83.5%	0	0.0%	42,311
White	6,027	17.0%	29,444	83.0%	0	0.0%	35,471
Black/African American	564	11.7%	4,255	88.3%	0	0.0%	4,819
Asian	159	28.2%	405	71.8%	0	0.0%	564
American Indian, Alaska Native	10	8.3%	110	91.7%	0	0.0%	120
Pacific Islander	0	0.0%	40	100.0%	0	0.0%	40
Hispanic	115	15.4%	631	84.6%	0	0.0%	746

Source:

HUD IDIS Output, February 2019: 2009-2013 ACS Data

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

80% - 100% of Areas Median Income

Within Macomb County, households within the 80%-100% AMI category have the lowest number of households that experience one or more of the four severe housing problems (1,694 households). As shown in **Table 30**, White and Black/African American households have the highest number of households with severe housing problems with 1,438 and 140 households, respectively.

In terms of disproportionate need, there are no racial or ethnic groups that have a rate of housing problems that is 10 percentage points higher than the jurisdiction as a whole.

Table 30: 80% - 100% of Area Median Income

Race	Has one or more of four housing problems		Has none of the four housing problems		Household has no/negative income, but none of the other housing problems		Total Households
	Total	% of Total	Total	% of Total	Total	% of Total	
Jurisdiction as a whole	1,694	6.3%	25,137	93.7%	0	0.0%	26,831
White	1,438	6.2%	21,707	93.8%	0	0.0%	23,145
Black/African American	140	6.6%	1,968	93.4%	0	0.0%	2,108
Asian	54	11.2%	427	88.8%	0	0.0%	481
American Indian, Alaska Native	0	0.0%	49	100.0%	0	0.0%	49
Pacific Islander	0	0.0%	85	100.0%	0	0.0%	85
Hispanic	0	0.0%	609	100.0%	0	0.0%	609

Source:

HUD IDIS Output, February 2019: 2009-2013 ACS Data

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Summary of Severe Housing Problems by AMI and Race

Of all households in the 0%-30% AMI category, 69.5% have one or more severe housing problems. In terms of disproportionate need, the Hispanic racial or ethnic groups (85.5%) have rates that are 10 percentage points higher than the household rate as a whole.

Of all households in the 30%-50% AMI category, 38.8% have one or more severe housing problems. In terms of disproportionate need, Asian racial or ethnic groups (52.4%) have rates that are 10 percentage points higher than the household rate as a whole.

Of all households in the 50%-80% AMI category, 16.5% have one or more severe housing problems. Asian racial or ethnic groups (28.2%) have rates that are 10 percentage points higher than the household rate as a whole.

Of all households in the 80%-100% AMI category, 6.3% has one or more severe housing problems. There are no racial or ethnic groups that have a rate that is 10 percentage points higher than the household rate as a whole.

Disproportionately Greater Need: Housing Costs Burdens

Again, a disproportionately greater need exists when the members of racial or ethnic group at a certain income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole.

Table 31 displays cost burden information for Macomb County and each racial and ethnic group, including no cost burden (less than 30%), cost burden (30-50%), severe cost burden (more than 50%), and no/negative income. The default data source for this data is the Comprehensive Housing Affordability Strategy (CHAS) data developed by HUD.

As the data in **Table 31** indicate, there are a large number of households who are cost burdened within their current housing situation (80,371). White households have the highest number of cost burdened households within the Macomb County with 65,510 households. Black/African American households are second with 10,331 households. Of the homes that are cost burdened, a high number of these households are severely cost burdened. Approximately 14% of households (35,908) are considered to be severely cost burdened within Macomb County.

Table 31: Housing Cost Burdens by Race

Race	No Cost Burden (<=30%)		Cost Burden (30-50%)		Severe Cost Burden (>50%)		No/Negative Income		Total Households
	Total	% of Total	Total	% of Total	Total	% of Total	Total	% of Total	
Jurisdiction as a whole	170,022	67.3%	44,463	17.6%	35,908	14.2%	2,368	0.9%	252,761
White	150,574	69.1%	37,115	17.0%	28,395	13.0%	1,789	0.8%	217,873
Black/African American	10,844	50.3%	4,924	22.8%	5,407	25.1%	384	1.8%	21,559
Asian	3,999	74.8%	584	10.9%	705	13.2%	60	1.1%	5,348
American Indian, Alaska Native	245	49.7%	185	37.5%	63	12.8%	0	0.0%	493
Pacific Islander	125	100.0%	0	0.0%	0	0.0%	0	0.0%	125
Hispanic	2,733	62.2%	863	19.6%	767	17.4%	34	0.8%	4,397

Source: HUD IDIS Output, February 2019: 2009-2013 ACS Data

Within Macomb County, 67.3% of households do not presently experience cost burden, while 17.6% experience cost burden, 14.2% experience severe cost burden and 0.9% have no/negative income.

Of all households within Macomb County 17.6% are cost burdened (30-50%). People in the American Indian, Alaska Native racial category (37.5%) experiences a cost burden in a disproportionate percentage (greater than 10%) than the jurisdiction as a whole.

Of all households within the Macomb County, 14.2% experience severe cost burden (>50%). In comparison to all households as a whole, the Black or African American racial group (25.1%) experiences severe cost burden in a disproportionate percentage (greater than 10%) than the jurisdiction as a whole.

Of all households within Macomb County, 0.9% (less than 1%) has no/negative income. There are no racial or ethnic groups that experiences no/negative income to a disproportionate degree (greater than 10%) than the jurisdiction as a whole.

Disproportionate Housing Needs in Urban County

Table 32 shows the disproportionate housing needs for Macomb County Urban County. For purposes of this analysis, disproportionate housing needs are those that are 10 percentage points higher than for the geography (i.e., county or region) as a whole.

Housing Problems

Approximately 32% of households in Macomb County Urban County experience any one of four housing problems. As shown, more than half (53.06%) of Black households and 44.68% of Hispanic households in Macomb County Urban County experience housing problems. These percentages are similar for the greater Detroit-Warren-Dearborn Region.

In both Macomb County Urban County and the greater Detroit-Warren-Dearborn Region, the occurrence of housing problems is greater in non-family households and households with five or more people. In both Macomb County Urban County and the greater Detroit-Warren-Dearborn Region, severe housing problems are least prevalent in White and Asian households; however, severe housing problems are most prevalent in Hispanic households. Black, Hispanic, and Other households generally have higher percentages of severe housing problems than other race/ethnicity groups.

Based on the data provided in **Table 32**, disproportionate housing needs may exist for households in the Black, Non-Hispanic racial/ethnic group, as well as for non-family households and households with five or more people (i.e., larger households).

Table 32: Demographics of Households with Disproportionate Housing Needs (Macomb County, MI CDBG, ESG) Jurisdiction			
Households experiencing any of 4 housing problems	# with problems	# households	% with problems
Race/Ethnicity			
White, Non-Hispanic	36,708	124,664	29.5%
Black, Non-Hispanic	5,656	10,659	53.1%
Hispanic	1,210	2,708	44.7%
Asian or Pacific Islander, Non-Hispanic	532	1,925	27.6%
Native American, Non-Hispanic	118	254	46.5%
Other, Non-Hispanic	736	1,594	46.2%
Total	44,945	141,819	31.7%
Household Type and Size			
Family households, <5 people	22,435	85,413	26.3%
Family households, 5+ people	5,221	14,870	35.1%
Non-family households	17,285	41,534	41.6%
Households experiencing any of 4 Severe Housing Problems	# with severe problems	# households	% with severe problems
Race/Ethnicity			
White, Non-Hispanic	15,962	124,664	12.8%
Black, Non-Hispanic	3,311	10,659	31.1%
Hispanic	717	2,708	26.5%
Asian or Pacific Islander, Non-Hispanic	329	1,925	17.1%
Native American, Non-Hispanic	18	254	7.1%
Other, Non-Hispanic	247	1,594	15.5%
Total	20,585	141,819	14.5%

Note 1: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%.

Source: AFFH Data and Mapping Tool, Data Updated September 29, 2017, Data Accessed April of 2019 (values and totals originated from AFFH Data and Mapping Tool).

Cost Burden in Urban County

Table 33 shows the severe housing cost burden for Macomb County Urban County. For purposes of this analysis, disproportionate cost burden is that which is 10 percentage points higher than for the geography (i.e., county or region) as a whole. As shown, 28.35% of Black households experience severe housing cost burden. Hispanic households (19.5%) also have a high percentage of households with severe housing cost burden, as do Other, Non-Hispanic households (15.06%). These percentages are similar for the greater Detroit-Warren-Dearborn Region.

In both Macomb County Urban County and the region, the occurrence of severe housing cost burden is greatest in non-family households. Large households (5 or more people) have greater percentages of severe cost burden than small households (less than 5 people).

Based on the data provided in **Table 33**, disproportionate severe housing cost burden may exist for Black households. Non-family and large households (5 or more people) are more cost burdened than small households (less than 5 people).

Table 33: Demographics of Households with Severe Housing Cost Burden			
Households with Severe Housing Cost Burden		(Macomb County, MI CDBG, ESG) Jurisdiction	
Race/Ethnicity	# with severe cost burden	# households	% with severe cost burden
White, Non-Hispanic	14,795	124,664	11.8%
Black, Non-Hispanic	3,022	10,659	28.4%
Hispanic	528	2,708	19.5%
Asian or Pacific Islander, Non-Hispanic	185	1,925	9.6%
Native American, Non-Hispanic	8	254	3.2%
Other, Non-Hispanic	240	1,594	15.1%
Total	18,778	141,819	13.2%
Household Type and Size	# with severe cost burden	# households	% with severe cost burden
Family households, <5 people	9,120	85,413	10.7%
Family households, 5+ people	1,790	14,870	12.0%
Non-family households	7,873	41,534	19.0%

Note 1: Severe housing cost burden is defined as greater than 50% of income.

Source: AFFH Data and Mapping Tool, Data Updated September 29, 2017, Data Accessed April of 2019 (values and totals originated from AFFH Data and Mapping Tool).

3.0 MORTGAGE ACTIVITY

Mortgage Based on Income

Tables 34-38 provide information on mortgage applications and originations based on the metropolitan statistical area median income for the area that encompasses Warren, Troy, and Farmington Hills, Michigan. The data is further broken down into categories based on race or ethnicity. In general, a higher percentage and number of loans were provided to applicants with higher incomes, which is not unexpected. The lowest percentage of loans were originated for those people within the <50% of MSA AMI income category. Asian and Black/African American race or ethnicity groups consistently received a low percentage of loans originated when compared to other groups, such as the White race or ethnicity group.

The Mortgage Loan Origination map (Appendix A) shows that Macomb County had the highest number of loans originated, while the southern part of the County typically had lower amounts of loans originated. This is consistent with the renter-occupied units map which shows that more renters live in the southern part of the County than the northern part of the County. This suggests that home ownership is greater in the northern municipalities within the County.

Of all the racial and ethnic groups in Macomb County, **Table 34** demonstrates that in the <50 % MSA AMI group, the American Indian/Alaska Native racial or ethnic group received the greatest percentage of conventional loans originated at 76.9%, and had the third highest percentage of FHA, FSA/RHS, and VA loans originated at 69.2%. The White racial or ethnic group had the highest percentage of FHA, FSA/RHS, and VA loans originated at 71.2%, and had the third highest percentage of conventional loans originated at 68.2%. Other than the 2 or More Minority Races group which did not have any loans successfully originated, the Black/African American racial or ethnic group had low average origination percentages (56.8%), as did the Native Hawaiian/Other Pacific Islander group (37.5%).

Table 34: Income, Race and Ethnicity: < 50% of MSA AMI

RACE/ETHNICITY	FHA, FSA/RHS, and VA					Conventional				
	Applications Received		Loans Originated		Percent Originated	Applications Received		Loans Originated		Percent Originated
	Number	\$000's	Number	\$000's		Number	\$000's	Number	\$000's	
American Indian/Alaska Native	13	1,195	9	857	69.2%	13	633	10	513	76.9%
Asian	45	4,680	31	3,280	68.9%	151	15,345	97	10,064	64.2%
Black or African American	413	40,153	247	24,015	59.8%	184	12,274	99	6,968	53.8%
Native Hawaiian/Other Pacific Islander	4	322	1	105	25.0%	2	125	1	17	50.0%
White	2,379	249,133	1,695	178,168	71.2%	3,272	289,866	2,230	211,656	68.2%
2 or More Minority Races	1	96	0	0	0.0%	2	104	0	0	0.0%
Joint (White/Minority Race)	6	822	3	374	50.0%	9	566	4	348	44.4%
Race not Available	247	25,661	152	16,063	61.5%	292	26,467	165	15,874	56.5%
Hispanic or Latino	83	8,651	57	5,819	68.7%	74	4,819	37	2,975	50.0%
Not Hispanic or Latino	2,802	289,748	1,942	202,069	69.3%	3,443	310,942	2,374	225,906	69.0%
Joint (Hispanic or Latino/Not Hispanic or Latino)	4	603	1	64	25.0%	11	919	5	542	45.5%
Ethnicity Not Available	219	23,060	138	14,910	63.0%	397	28,700	190	16,017	47.9%

Source: HDMA Aggregate Table 5-1 and 5-2 (2016)

Table 35 depicts that for the income group in Macomb County ranging from 50-79% MSA AMI, the Asian racial or ethnic group had the highest percentage of conventional loans originated (78.0%), but a lower percentage of FHA, FSA/RHS, and VA loans originated (61.7%). Again, the White racial or ethnic group maintains a high percentage of loans originated for both conventional and FHA, FSA/RHS, and VA loans.

Table 35: Income, Race and Ethnicity: 50-79% of MSA AMI										
RACE/ETHNICITY	FHA, FSA/RHS, and VA					Conventional				
	Applications Received		Loans Originated		Percent Originated	Applications Received		Loans Originated		Percent Originated
	Number	\$000's	Number	\$000's		Number	\$000's	Number	\$000's	
American Indian/Alaska Native	11	1,365	7	980	63.6%	21	2,851	15	2,349	71.4%
Asian	60	9,571	37	587	61.7%	214	34,854	167	26,877	78.0%
Black or African American	697	93,005	440	58,626	63.1%	365	37,971	220	24,408	60.3%
Native Hawaiian/Other Pacific Islander	5	733	5	733	100.0%	8	1,069	6	858	75.0%
White	4,096	604,386	3,142	464,489	76.7%	6,025	789,250	4,638	629,264	77.0%
2 or More Minority Races	3	302	0	0	0.0%	8	1,025	5	553	62.5%
Joint (White/Minority Race)	29	3,774	22	2,972	75.9%	32	3,802	21	3,138	65.6%
Race not Available	363	49,790	236	31,634	65.0%	594	78,203	407	54,887	68.5%
Hispanic or Latino	99	14,609	71	10,613	71.7%	121	12,816	68	7,945	56.2%
Not Hispanic or Latino	4,799	698,026	3,586	523,116	74.7%	6,459	854,375	4,979	678,496	77.1%
Joint (Hispanic or Latino/Not Hispanic or Latino)	24	3,387	19	2,896	79.2%	31	3,274	19	2,460	61.3%
Ethnicity Not Available	342	46,904	213	28,666	62.3%	656	78,540	413	53,433	63.0%

Source: HDMA Aggregate Table 5-1 and 5-2 (2016)

Table 36 demonstrates that in Macomb County, 60.0% of FHA, FSA/RHS, and VA loans were originated for Asian racial or ethnic groups with an income of 80-99% of MSA AMI. Comparatively, 78.9% of conventional loans were originated for the same group. Only 10% of conventional loans were originated for individuals in the American Indian/Alaska Native racial or ethnic group. However, this same group received 83.3% of FHA, FSA/RHS, and VA loan originations. The White racial or ethnic group received an average loan origination of 77.6%, while the Black/African American racial or ethnic group received an average loan origination of 65%.

Table 36: Income, Race and Ethnicity: 80-99% of MSA AMI

RACE/ETHNICITY	FHA, FSA/RHS, and VA					Conventional				
	Applications Received		Loans Originated		Percent Originated	Applications Received		Loans Originated		Percent Originated
	Number	\$000's	Number	\$000's		Number	\$000's	Number	\$000's	
American Indian/Alaska Native	6	1,238	5	891	83.3%	10	1,817	1	1,376	10.0%
Asian	20	3,579	12	2,044	60.0%	223	42,989	176	33,305	78.9%
Black or African American	304	52,892	207	36,695	68.1%	177	25,041	108	16,490	61.0%
Native Hawaiian/Other Pacific Islander	1	145	0	0	0.0%	8	1,635	5	978	62.5%
White	1,872	336,463	1,429	258,539	76.3%	3,573	595,415	2,822	475,504	79.0%
2 or More Minority Races	1	239	1	239	100.0%	3	512	0	0	0.0%
Joint (White/Minority Race)	26	4,134	21	3,248	80.8%	19	3,118	15	2,714	78.9%
Race not Available	200	34,594	145	25,359	72.5%	355	60,791	262	45,204	73.8%
Hispanic or Latino	55	10,325	37	7,028	67.3%	66	10,199	50	8,050	75.8%
Not Hispanic or Latino	2,177	389,417	1,641	295,475	75.4%	3,899	654,328	3,066	520,272	78.6%
Joint (Hispanic or Latino/Not Hispanic or Latino)	16	2,086	12	1,528	75.0%	26	3,678	18	2,747	69.2%
Ethnicity Not Available	182	30,156	130	22,984	71.4%	377	63,113	261	44,502	69.2%

Source: HDMA Aggregate Table 5-1 and 5-2 (2016)

As shown by **Table 37**, the White racial or ethnic group within the 100-119% MSA AMI has the highest percentage of conventional loans originated (81.5%), and the third highest percentage of FHA, FSA/RHS, and VA loans originated (78.9%). Hispanic racial or ethnic groups experienced an average of 80.9% loan origination. American Indian/Alaska Native racial or ethnic group received the lowest average percentage of loan originations at 54.8%. Of all the income groups, this income group had the overall highest percentage of loans originated at 78.9% of application received.

Table 37: Income, Race and Ethnicity: 100-119% of MSA AMI

RACE/ETHNICITY	FHA, FSA/RHS, and VA					Conventional				
	Applications Received		Loans Originated		Percent Originated	Applications Received		Loans Originated		Percent Originated
	Number	\$000's	Number	\$000's		Number	\$000's	Number	\$000's	
American Indian/Alaska Native	7	1,175	3	468	42.9%	3	583	2	483	66.7%
Asian	22	4,458	16	3,442	72.7%	321	76,003	250	59,161	77.9%
Black or African American	200	39,585	139	27,672	69.5%	171	30,195	117	21,682	68.4%
Native Hawaiian/Other Pacific Islander	2	253	1	112	50.0%	5	849	4	726	80.0%
White	1,310	260,527	1,033	208,741	78.9%	3,349	655,190	2,730	539,998	81.5%
2 or More Minority Races	0	0	0	0	0.0%	4	766	3	605	75.0%
Joint (White/Minority Race)	25	4,836	16	2,928	64.0%	31	7,150	20	4,502	64.5%
Race not Available	141	27,323	92	17,600	65.2%	383	80,057	291	61,462	76.0%
Hispanic or Latino	36	8,081	30	6,870	83.3%	79	17,396	62	13,714	78.5%
Not Hispanic or Latino	1,517	300,702	1,168	234,753	77.0%	3,786	752,667	3,055	612,898	80.7%
Joint (Hispanic or Latino/Not Hispanic or Latino)	15	2,800	12	2,095	80.0%	29	5,069	22	4,283	75.9%
Ethnicity Not Available	139	26,574	90	17,245	64.7%	373	75,661	278	57,724	74.5%

Source: HDMA Aggregate Table 5-1 and 5-2 (2016)

Table 38 shows that high percentages of conventional loans were provided to the racial or ethnic groups of Native Hawaiian/Other Pacific Islander, White, 2 or More Minority Races, Joint (white/Minority Race), and Hispanic or Latino (all 80% or higher). Notably, the lowest percentage of conventional loans originated is 71.3%, which is a higher percentage than half of the percentages for groups who applied for FHA, FSA/RHS, and VA loans with this income bracket. Native Hawaiian/Other Pacific Islander racial or ethnic groups experienced the lowest percentage of loans originated by FHA, FSA/RHS, and VA.

Table 38: Income, Race and Ethnicity: > 120% of MSA AMI

RACE/ETHNICITY	FHA, FSA/RHS, and VA					Conventional				
	Applications Received		Loans Originated		Percent Originated	Applications Received		Loans Originated		Percent Originated
	Number	\$000's	Number	\$000's		Number	\$000's	Number	\$000's	
American Indian/Alaska Native	8	1,850	6	1,370	75.0%	19	6,038	14	3,772	73.7%
Asian	18	4,723	12	2,905	66.7%	1,198	409,789	897	301,332	74.9%
Black or African American	264	60,427	171	39,426	64.8%	410	112,806	316	30,131	77.1%
Native Hawaiian/Other Pacific Islander	5	1,148	3	722	60.0%	16	4,271	13	3,300	81.3%
White	1,784	413,022	1,389	321,644	77.9%	11,898	3,536,587	9,555	2,797,844	80.3%
2 or More Minority Races	3	631	3	631	100.0%	5	1,360	4	1,184	80.0%
Joint (White/Minority Race)	57	13,754	45	10,901	78.9%	217	67,487	177	54,180	81.6%
Race not Available	184	44,721	127	30,926	69.0%	1,601	496,197	1,159	358,351	72.4%
Hispanic or Latino	38	9,868	29	7,548	76.3%	219	67,674	180	54,253	82.2%
Not Hispanic or Latino	2,067	477,636	1,578	365,163	76.3%	13,410	4,014,672	10,704	3,153,332	79.8%
Joint (Hispanic or Latino/Not Hispanic or Latino)	40	9,020	28	6,196	70.0%	163	47,956	130	39,787	79.8%
Ethnicity Not Available	178	43,752	121	29,618	68.0%	1,572	504,233	1,121	362,722	71.3%

Source: HDMA Aggregate Table 5-1 and 5-2 (2016)

Mortgage Based on Race

Table 39 provides information on mortgage applications and originations based on race. In general, a higher percentage and number of loans were provided to persons identifying as White. A total of 30,875 loans were originated for persons that were White opposed to African American (2,078), Asian (1,702), and Joint Race (344). In addition, persons that identified as White generally had a higher average percentage of loan origination (77%) opposed to those who are African American (64.9%). Those who identify under the Joint Race category have a similarly high average percentage of loan origination (75.6%) as those who identify as White.

RACE	FHA, FSA/RHS, and VA					Conventional				
	Applications Received		Loans Originated		Percent Originated	Applications Received		Loans Originated		Percent Originated
	Number	\$000's	Number	\$000's		Number	\$000's	Number	\$000's	
American Indian/Alaska Native (Total)	45	6,823	30	4,566	66.7%	66	11,902	48	8,493	72.7%
Male	32	4,891	19	2,859	59.4%	33	4,888	23	3,623	69.7%
Female	10	1,478	9	1,345	90.0%	23	4,290	18	3,432	78.3%
Joint (Male/Female)	3	454	2	362	66.7%	6	1,280	4	794	66.7%
Asian (Total)	165	27,011	108	17,528	65.5%	2,122	584,884	1,594	432,682	75.1%
Male	91	15,071	63	10,280	69.2%	1,289	355,844	966	261,371	74.9%
Female	45	6,884	31	4,926	68.9%	347	76,126	258	55,737	74.4%
Joint (Male/Female)	29	5,056	14	2,322	48.3%	485	152,653	369	115,313	76.1%
Black or African American (Total)	1,889	287,702	1,212	187,660	64.2%	1,321	220,454	866	160,850	65.6%
Male	777	123,946	488	78,971	62.8%	456	81,363	304	58,075	66.7%
Female	895	124,892	568	80,448	63.5%	615	83,773	386	58,561	62.8%
Joint (Male/Female)	212	38,238	153	27,934	72.2%	245	54,723	172	43,678	70.2%
Native Hawaiian/Other Pacific Islander (Total)	17	2,601	10	1,672	58.8%	39	7,949	29	5,879	74.4%
Male	11	1,573	6	1,065	54.5%	17	3,483	12	2,623	70.6%
Female	4	620	3	475	75.0%	15	3,093	11	1,970	73.3%
Joint (Male/Female)	2	408	1	132	50.0%	6	1,195	5	1,108	83.3%
White (Total)	11,501	1,873,407	8,726	1,437,559	75.9%	28,377	5,925,969	22,149	4,695,420	78.1%
Male	5,632	910,408	4,228	692,325	75.1%	11,333	2,347,427	8,762	1,815,632	77.3%
Female	2,798	390,466	2,102	295,170	75.1%	6,419	1,010,054	4,933	801,987	76.8%
Joint (Male/Female)	3,053	570,011	2,388	448,822	78.2%	10,593	2,562,128	8,430	2,073,276	79.6%
2 or More Minority Races	8	1,268	4	870	50.0%	22	3,767	12	2,342	54.5%
Male	4	710	2	470	50.0%	6	1,247	3	723	50.0%
Female	1	62	0	0	0.0%	12	2,046	6	1,214	50.0%
Joint (Male/Female)	3	496	2	400	66.7%	4	474	3	405	75.0%
Joint (White/Minority Race Total)	144	27,396	107	20,423	74.3%	308	82,123	237	64,882	76.9%
Male	4	532	3	498	75.0%	7	1,435	5	1,340	71.4%
Female	1	137	1	137	100.0%	4	994	3	767	75.0%
Joint (Male/Female)	139	26,727	103	19,788	74.1%	297	79,694	229	62,775	77.1%
Race Not Available	1,148	183,872	756	122,182	65.9%	3,523	782,998	2,535	565,091	72.0%
Male	219	35,852	142	23,009	64.8%	505	106,729	358	77,855	70.9%
Female	124	17,743	71	10,205	57.3%	233	37,700	158	27,817	67.8%
Joint (Male/Female)	92	16,185	73	13,341	79.3%	386	91,712	287	68,256	74.4%

Source: HMDA Aggregate Table 4-1 and 4-2 (2016)

3.1 INTEGRATION AND ISOLATION

In order to affirmatively further fair housing, Macomb County must recognize barriers to fair housing choice and provide actions to increase choice. An analysis of isolation and integration across the County helps to identify areas where these barriers may exist. Residential isolation produces damaging socioeconomic outcomes for minority and low-income groups. Housing patterns across the United States, and Macomb County, continue to show lasting areas of separation for certain races and income groups. The social and public policies of our past, like Jim Crow laws and Federal Housing Administration's early redlining policies, brought about much of the segregation in housing that is still seen today. More recent trends in residential isolation are generally attributed to suburbanization, discrimination, and personal preferences.

An analysis of historical U.S. Census data by researchers at Harvard and Duke Universities for the Manhattan Institute for Policy Research, indicates that racial separation has diminished since the 1960s. The report, published by the Manhattan Institute for Policy Research, indicates that the separation of Black/African American residents from other races is now lower than the national average from 1970. In addition, separation continued to drop over the last decade. The Manhattan Institute published "The End of the Segregated Century: Racial Separation in American's Neighborhoods, 1890- 2010" which indicated that 522 out of 658 housing markets recorded a decline in segregation.

Despite recent trends in integration, Black/African American households remain the most isolated racial group and are in fact hyper-separated in many of the largest metropolitan areas, including Baltimore, Chicago, Cleveland, Detroit, Houston, Los Angeles, New Orleans, New York, Philadelphia and Washington, D.C. according to "A Right to Housing: Foundation for a New Social Agenda" published by Temple University. Hispanics are the second most isolated racial group, primarily in northern metropolitan areas.

Patterns for income segregation are derived from the National Survey of America's Families, the Census and Home Mortgage Disclosure Act data, which indicate income segregation grew between 1970 and 1990. Poor families are becoming more isolated. Whereas in 1970 only 14 percent of poor families lived in predominantly poor areas, this number increased to 28 percent in 1990 and continues to rise according to the Urban Institute who published "Residential Segregation and Low-Income Working Families." Current trends in racial and income based residential isolation are attributed to several factors, including:

A. Exclusionary zoning and land use practices

The "separate but equal" laws established in the early part of the 20th Century specified exclusively Black/African American, White/Caucasian and mixed districts and legally established segregation in housing opportunities. Many cities, particularly in the South and mid-South, developed and adopted racial zonings between 1910 and 1915. By 1917, the Supreme Court ruled that racial zoning was illegal, but many local governments continued to enforce racial

segregation through alternative land use designations. While these actions occurred a century ago, the impact is still felt because of their significant influence on settlement patterns.

Today, many jurisdictions adopt land-use zoning regulations such as large-lot zoning, minimum house size requirements, and bans on secondary units which make housing more expensive. The result is often the exclusion of lower income households from certain communities and/or neighborhoods.

B. Discriminatory homeownership practices

Discriminatory homeownership practices include redlining and steering. In 1944, the Federal Housing Administration adopted maps developed by the federally created Home Owners' Loan Corporation that coded areas as "credit-worthy" based on race and the age of the housing stock. These maps, called Residential Security Maps, established and sanctioned "redlining." It became common practice for banks to deny residents in predominately minority neighborhoods long-term mortgages because they lived in redlined areas.

The United States Supreme Court defines steering as a "practice by which real estate brokers and agents preserve and encourage patterns of racial segregation by either steering members of racial and ethnic groups to certain neighborhoods occupied by similar groups and away from neighborhoods inhabited primarily by members of other races or groups." Essentially, real estate agents "steer" people of color toward neighborhoods of color, while White/Caucasian homebuyers are directed to primarily White/Caucasian neighborhoods, continually reinforcing separation and isolation. The Fair Housing Act made discrimination in housing illegal. However, there is a belief that steering is still common. For example, some real estate agents may indirectly and possibly unknowingly steer families through using language such as "ethnic mix" or "multicultural."

C. Attitudes and preferences towards housing location

Residential preferences of persons of color may, in some instances, be categorized by social-psychological and socioeconomic demographic characteristics. The theory behind social-psychological residential preference is that separation is a result of persons of color choosing to live together because of cultural similarities, maintaining a sense of racial pride, or a desire to avoid living near other groups because of fear of racial hostility. Other theories suggest demographic and socioeconomic factors such as age, gender and social class influence residential choice more than race. Evidence explaining these assumptions are generally limited and anecdotal in nature [Farley, Reynolds; Fielding, Elaine L.; Krysan, Maria (1997). "The residential preferences of blacks and whites: A four-metropolis analysis". *Housing Policy Debate* 8 (4): 763–800].

Data suggests that foreign-born Hispanics, Asians and Black/African Americans often have higher rates of isolation than do native-born individuals from these same groups. Separation of

immigrants is generally associated with language barriers. Support networks often exist in these enclaves to assist with linguistic isolation. Research on assimilation shows that while new immigrants settle in homogenous ethnic communities, isolation declines as they gain socioeconomic status and move away from these communities, integrating with the native-born. This provides some support to the idea that socioeconomic status plays a significant role in housing choice, possibly more than race.

D. Location of Public Housing

Racial separation in public housing occurs when high concentrations of a certain minority group occupy one specific public housing development. Income segregation occurs when high concentrations of public housing are located in one specific area of a community or region. Of the 310 public housing units constructed by the Public Works Administration and the U.S. Housing Authority before World War II, 279 were segregated by race. After World War II, antidiscrimination laws were passed which made segregated public housing illegal. However, the historical pattern was set.

In addition, most of the housing projects built between 1932 and 1963 were located primarily in “slum” areas and vacant industrial sites according to the Urban Land Institute (ULI), which published “Residential Segregation and Low-Income Working Families.” This trend continued between 1964 and 1992, when most projects were located in the older parts of core cities that were considered low income. Due to these practices, public housing is concentrated, increasing the density of low-income families in certain parts of communities.

E. Gentrification

Gentrification is another form of residential separation, generally by class or economic status, and is defined by new higher income residents displacing lower income residents in emerging urban neighborhoods. The most commonly held belief about gentrification is that residential turnover of an area is from one that is predominantly residents of color, to one that is populated by higher income White/Caucasians. However, definitions of gentrification do not typically mention this racial component.

Integration and Isolation in Macomb County

Areas of racial integration and isolation can be found in the Macomb County (reference Integration map – Appendix A). The greatest percentage of the County’s population is white; however, there is evidence of integration in the cities of Centerline, Sterling Heights, Warren, Eastpointe, Roseville, Mount Clemens, and Clinton Township. However, while there are populations of White, Black, Hispanic, and Other Racial Groups mixed together, there is still a strong trend of Black populations residing primarily along the southern edge of the County while White, Hispanic, and Other racial group populations tend to reside further north. In addition, several of these communities including Sterling Heights, Clinton Township, Warren, and Roseville all receive their own CDBG allocations. Along the I-94 corridor, there is a clear divide between minority populations and white populations. Harrison Township, the city of St. Clair

Shores, and the Village of Grosse Pointe Shores are predominantly white neighborhoods. Evidently, established municipalities within the County have higher concentrations of people of color and areas of integration while neighborhoods developed later in the County's history tend to be more isolated and have higher concentrations of White/Caucasian households.

Non-White persons make up 17.8% of the total population of Macomb County. Based on this percentage, an assumption can be made that a Census tract with at least 17.8% of people that identify as non-white would be fairly integrated per County averages. Census tracts with percentages much higher or much lower than 17.8% would be considered more isolated for the demographic group that lives in the Census Tract. For example, Census Tract 2588 has one of the highest percentages of Non-White populations and therefore White/Caucasians are isolated within this neighborhood.

HUD defines racial concentration as an area having more than 50 percent non-White/Caucasian population. Listed in **Table 40** are the census tracts within the Macomb County whose minority population is greater than 50%.

Table 40: Concentrations of Minority Populations by Census Tract

Census Tract	Total Population	Total Minority Population	% of Total	Entitlement or Urban County
9820	11	11	100.0%	Entitlement
2588	3,716	3,136	84.39%	Urban County
2454	1,443	1,000	69.30%	Urban County
2640	2,043	1,277	62.51%	Entitlement
2636	4,846	3,029	62.51%	Entitlement
2585	2,017	1,224	60.68%	Urban County
2638	3,053	1,819	59.58%	Entitlement
2586	4,736	2,784	58.78%	Urban County
2589	2,671	1,568	58.70%	Urban County
2587	2,475	1,287	52.00%	Urban County
2476.01	1,872	965	51.55%	Urban County
2683	2,665	1,355	50.84%	Entitlement
2580	2,814	1,422	50.53%	Urban County

Source: 2013-2017 American Community Survey 5-Year Estimates; HUD CDBG Allocations 2018

Residents who identified themselves during the 2017 American Community Survey (ACS) as Black/African American are the second largest racial group in Macomb County at 11.0%. Based on the assumption that a percentage share similar to the County as a whole would indicate a more integrated Census Block Group in Macomb County, Block Groups 2417, 2551, and 2609 are the closest to the 11.0% total population share.

The most important note gathered from **Table 41** is the extremely high concentrations of Black/African Americans in Census Tracts 2588, 2454, and 2585. As indicated earlier in this report, these neighborhoods are hyper-separated as defined by the book “A Right to Housing: Foundation for a New Social Agenda” (Temple University Press). This can be viewed graphically on the African American Population Map located in the Appendix of this report. The following table displays a select group of Census Tracts that are closest to and farthest from the total percentage Black or African American population within the County.

Census Block Groups	Total Population	Total Black / African American	Percent of Total Population	Difference Between Total and Block Group	Entitlement or Urban County
All	864,019	95,399	11.04%		
2588	3,716	2,971	79.95%	68.91%	Urban County
2454	1,443	839	58.14%	47.10%	Urban County
2585	2,017	1,147	56.87%	45.83%	Urban County
2640	2,043	1,120	54.82%	43.78%	Entitlement
2589	2,671	1,455	54.47%	43.43%	Urban County
2586	4,736	2,356	49.75%	38.71%	Urban County
2638	3,053	1,414	46.32%	35.28%	Entitlement
2450	3,623	1,672	46.15%	35.11%	Urban County
2587	2,475	1,122	45.33%	34.29%	Urban County
2683	2,665	1,137	42.66%	31.62%	Entitlement
2476.01	1,872	797	42.57%	31.53%	Urban County
2642	4,185	1,733	41.41%	30.37%	Entitlement
2636	4,846	1,940	40.03%	28.99%	Entitlement
2610	3,518	424	12.05%	1.01%	Entitlement
2621	1,053	126	11.97%	0.93%	Entitlement
2625	5,508	645	11.71%	0.67%	Entitlement
2425	6,130	717	11.70%	0.66%	Entitlement
2613	3,061	356	11.63%	0.59%	Entitlement
2417	4,571	522	11.42%	0.38%	Entitlement
2551	3,282	361	11.00%	-0.04%	Entitlement
2609	4,780	523	10.94%	-0.1%	Entitlement
2120	5,476	32	0.58%	-10.46%	Urban County
2155	7,472	37	0.50%	-10.54%	Urban County
2145	4,561	22	0.48%	-10.56%	Urban County
2505	2,024	9	0.44%	-10.6%	Entitlement
2254	7,572	30	0.40%	-10.64%	Urban County
2100	4,525	17	0.38%	-10.66%	Urban County
2257.02	1,661	6	0.36%	-10.68%	Urban County
2614	2,825	10	0.35%	-10.69%	Entitlement

Block Groups with the highest concentration of Black or African American population

Block Groups closest to the overall County percentage for Black or African American population

Source: US Census Bureau 2013-2017 American Community Survey 5-year Estimates; HUD CDBG Allocations 2018

As evidenced in **Table 42** below, Census Tracts 2471, 2281, and 2588 have the highest concentrations of Hispanic or Latino population within the Urban County while Census Block Group 2568, 2553, and 2421 are the closest to the overall Hispanic or Latino population percentage (2.5%) of the City. These tracts all reside within a CDBG entitlement community.

Table 42: Hispanic or Latino Population by Census Block Group					
Census Block Groups	Total Population	Total Hispanic or Latino Origin	Percent of Total Population	Difference Between Total and Block Group	Entitlement or Urban County
Total	864,019	21,575	2.5%		
9822	33	7	21.21%	18.71%	Entitlement
2471	1,013	204	20.14%	17.64%	Urban County
2281	1,561	162	10.38%	7.88%	Urban County
2305	3,394	349	10.28%	7.78%	Entitlement
2588	3,716	103	2.77%	0.27%	Urban County
2415	3,593	99	2.76%	0.26%	Entitlement
2310	4,350	118	2.71%	0.21%	Entitlement
2568	1,480	38	2.57%	0.07%	Entitlement
2553	4,106	102	2.48%	-0.02%	Entitlement
2421	2,677	66	2.47%	-0.03%	Entitlement
2420	5,954	144	2.42%	-0.08%	Entitlement
2507	2,999	72	2.40%	-0.10%	Entitlement
2410	4,770	114	2.39%	-0.11%	Entitlement
2504	1,554	37	2.38%	-0.12%	Entitlement
2240	13,561	322	2.37%	-0.13%	Urban County
2603	3,036	72	2.37%	-0.13%	Entitlement
2303	4,538	107	2.36%	-0.14%	Entitlement
2561	2,455	57	2.32%	-0.18%	Entitlement
2413	2,509	57	2.27%	-0.23%	Entitlement
2587	2,475	56	2.26%	-0.24%	Urban County
2510	1,594	36	2.26%	-0.24%	Entitlement
2582	2,880	65	2.26%	-0.24%	Urban County
2258	6,970	157	2.25%	-0.25%	Urban County

Block Groups with the highest concentration of Hispanic or Latino population

Block Groups closest to the overall County percentage for Hispanic or Latino population

Source: US Census Bureau 2013-2017 American Community Survey 5-year Estimates; HUD CDBG Allocations 2018

It is important that individuals be able to choose where they prefer to live without regard to race, color, religion, national origin, sex, familial status or disability. An analysis of segregation and integration serves to ensure that communities provide open and fair access to residential neighborhoods. While individuals are free to choose where they prefer to live, the Fair Housing Act prohibits policies and actions by entities and individuals that deny choice or access to housing or opportunity through the segregation of protected classes.

A dissimilarity index is used to measure the degree to which two groups are evenly distributed across a geographic area. It is a tool used to assess residential segregation between two groups. The dissimilarity index provides values ranging from 0 to 100, where higher numbers indicate a higher degree of segregation among the two groups measured. The table below, **Table 43(A)**, demonstrates the general relationship between dissimilarity index values and the level of segregation.

Table 43(A): Dissimilarity Index		
	Value	Level of Segregation
Dissimilarity Index Value (0-100)	0-39	Low Segregation
	40-54	Moderate Segregation
	55-100	High Segregation

Source: AFFH Data and Mapping Tool, Data Updated September 29, 2017, Data Accessed April of 2019

However, context is important in interpreting the dissimilarity index. The index does not indicate spatial patterns of segregation, just the relative degree of segregation; and, for populations that are small in absolute number, the dissimilarity index may be high even if the group’s members are evenly distributed throughout the area. The index measures only two groups at a time, and therefore it is less reliable as a measure of segregation in areas with multiple racial or ethnic groups.

According to **Table 43(B)**, Macomb County currently experiences low to moderate segregation between different racial groups. The Black/White dissimilarity index is the highest with a value of 54.99 which is on the border of moderate to high. However, it is important to note that the Black/White dissimilarity index shows a decrease since 1990 when the value was at 71.01.

Table 43(B) shows the dissimilarity index value for Hispanic/White and Asian or Pacific Islander/White have increased between 1990 and today.

Table 43(B): Racial/Ethnic Dissimilarity Trends				
(Macomb County, MI CDBG, ESG) Jurisdiction				
Racial/Ethnic Dissimilarity Index	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	40.93	33.36	32.33	38.82
Black/White	71.01	56.37	50.04	54.99
Hispanic/White	17.53	23.58	25.31	29.53
Asian or Pacific Islander/White	26.52	25.81	28.57	36.93

Source: AFFH Data and Mapping Tool, Data Updated September 29, 2017, Data Accessed April of 2019

Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs)

A racially or ethnically concentrated area of poverty (R/ECAP) is a geographic area with significant concentrations of poverty and minority concentrations. A large body of research has consistently found that the problems associated with segregation are intensified when combined with concentrated poverty. Neighborhoods of concentrated poverty may isolate residents from the resources and networks needed. Concentrated poverty has also been found to have a long-term effect on outcomes for children growing up in these neighborhoods related to a variety of indicators, including crime, health and education, future employment, and lifetime earnings. A R/ECAP analysis addresses concerns raised in the legislative history of the Fair Housing Act. The 1968 Kerner Commission on Civil Disorders acknowledged that “segregation” and poverty” create “a destructive environment”.

Data collected from the AFFH Data and Mapping Tool identifies only one Census Tract that HUD defines as a R/ECAP within Macomb County. Census Tract 2640 is shown on the attached maps as a R/ECAP area as defined by HUD and resides within the City of Warren. This is outside the Macomb County CDBG, ESG Jurisdiction. According to the 2013-2017 ACS, Census Tract 2640 has a poverty rate of 36.4% among the entire population. The Black or African American Population makes up 54.6 of the Census Tract with a poverty rate of 42%.

4.0 MACOMB COUNTY FAIR HOUSING PROGRAM ACTIONS (2013-2018)

The County does not have enough funding to address all impediments every program year. The actions taken during this reporting period were subject to the availability of HUD funding and the availability of local resources (staff and funding). However, the County understands the importance of supporting Fair Housing and will continue to make best efforts to address the recommendations provided in the AI.

4.1 PROGRAM YEAR 2013

Lack of Fair Housing Education and Awareness

1. Staff attended the Southeast Michigan Fair Housing and Equity Summit held at Southeast Michigan Council of Governments (SEMCOG) on December 11, 2013. The full day event highlighted speakers from HUD Region V, HUD Chicago Regional Field Office, Detroit HUD Office of Fair Housing and Equal Opportunity, HUD Office of Sustainable Housing and Communities, SEMCOG, and Fair Housing Center of Metropolitan Detroit.
2. On January 22, 2014, training on fair housing laws was held for the Macomb HOME Consortium members, as well as the communities and some service providers that are part of the Urban County's jurisdiction. This event was the first stage in an effort to train and educate staff and local community and service partners. The three-hour training held at the Macomb Intermediate School District, was presented by Margaret Brown, Executive Director of the Fair Housing Center of Metropolitan Detroit. Topics included an introduction to the Fair Housing Center of Metropolitan Detroit, a brief history of the Fair Housing Act and other laws, and recent Fair Housing cases. The training was well received by participants. Program staff intent to offer similar training on an annual basis.

Availability of Housing for the Elderly

The County responded to this impediment by funding a major housing development in the City of Eastpointe, Oakwood Manor Senior Living, with funds from the NSP and HOME programs. The project provided 40 new units of elderly rental housing affordable to low-, very-low-, and extremely-low-income households. This development was facilitated by a partnership between Macomb County and the City of Eastpointe through a for-profit developer.

Racial and ethnic minorities are concentrated geographically within the County.

While not federally funded, the County addressed this impediment through its diversity and inclusion initiative (OneMacomb). OneMacomb was sparked by a comprehensive study titled, "The New Macomb County" prepared in partnership with Macomb Community College, Macomb County and Data Driven Detroit in 2012. The study documented the County's changing demographics and the need to embrace our current and future make up of citizens that make Macomb their home.

Purpose, Vision and Mission of OneMacomb is as follows:

- Purpose – to support Macomb County leaders in active, positive, and affirmative response to its

increasing cultural diversity and inclusion efforts

- Vision – a community that welcomes all people and celebrates their unique contributions
- Mission – to facilitate or support collaborative and community-based activities which celebrate cultural diversity and inclusion in Macomb County

ADA Education

The communities that participate in the Macomb Urban County CDBG program are encouraged to use CDBG funding for ADA improvements in their community.

4.2 PROGRAM YEAR 2014

Lack of Fair Housing Education and Awareness

1. Staff attended training at the Building Michigan Communities Conference held April 2015.
2. Representatives from the Fair Housing Center of Metropolitan Detroit met with senior representatives from the Macomb County Community Services Agency, Office of the County Executive, and the Office of Health and Community Services to review Fair Housing requirements and to develop a strategy for expanding Fair Housing education efforts during the next program year.
3. Continental Management, the management company for the County HOME-funded Oakwood Senior Housing facility, required all employees to complete Fair Housing training within 90 days of hire.

Racial and Ethnic Minorities are Concentrated Geographically within the County

While not federally funded, the County addressed this impediment through its diversity and inclusion initiative (OneMacomb). On Macomb was sparked by a comprehensive study titled, "The New Macomb County" prepared in partnership with Macomb Community College, Macomb County, and Data Drive Detroit in 2012. The study documented the County's changing demographics and the need to embrace our current and future make-up of citizens that make Macomb their home.

Unavailability of Fair Housing Information on Websites of Cities and Public Housing Agencies Including Information on Filing Housing Complaints

To address the unavailability of fair housing information on the websites of local cities and public housing agencies CDBG Urban County partner communities posted the following link on their websites: http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp.

ADA Education

The communities that participate in the Macomb Urban County CDBG program are encouraged to use CDBG funding for ADA improvements in their community. During the 2014 program year one community, the City of Memphis allocated CDBG funding to ADA improvements in City Hall.

4.3 PROGRAM YEAR 2015

Lack of Fair Housing Education and Awareness

1. Staff attended training at the Building Michigan Communities Conference held April 2016.
2. Representatives from the Fair Housing Center of Metropolitan Detroit conducted training to landlords and their staff. Over 80 participants pre-registered for the training.
3. Continental Management, the management company for the County HOME-funded Oakwood Senior Housing facility, required all employees to complete Fair Housing training within 90 days of hire.

Racial and Ethnic Minorities are Concentrated Geographically within the County

While not federally funded, the County addressed this impediment through its diversity and inclusion initiative (OneMacomb). On Macomb was sparked by a comprehensive study titled, "The New Macomb County" prepared in partnership with Macomb Community College, Macomb County, and Data Drive Detroit in 2012. The study documented the County's changing demographics and the need to embrace our current and future make up of citizens that make Macomb their home.

Unavailability of Fair Housing Information on Websites of Cities and Public Housing Agencies Including Information on Filing Housing Complaints

To address the unavailability of fair housing information on the websites of local cities and public housing agencies, CDBG Urban County partner communities posted the following link on their websites: http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp

ADA Education

The communities that participate in the Macomb Urban County CDBG program are encouraged to use CDBG funding for ADA improvements in their community. During the 2015 program year Shelby Township used CDBG to install ADA compliant doors in the Township Hall.

4.4 PROGRAM YEAR 2016

Lack of Fair Housing Education and Awareness

1. Representatives from the Fair Housing Center of Metropolitan Detroit conducted training to Macomb Community Action staff at the agency's in-service training. Over 150 employees participated in the training.
2. Continental Management, the management company for the County HOME funded Oakwood Senior Housing facility, required all employees to complete Fair Housing training within 90 days of hire.

Racial and Ethnic Minorities are Concentrated Geographically within the County

While not federally funded, the County addressed this impediment through its diversity and inclusion initiative (OneMacomb). On Macomb was sparked by a comprehensive study titled, "The New Macomb

County" prepared in partnership with Macomb Community College, Macomb County, and Data Drive Detroit in 2012. The study documented the County's changing demographics and the need to embrace our current and future make up of citizens that make Macomb their home.

ADA Education

The communities that participate in the Macomb Urban County CDBG program are encouraged to use CDBG funding for ADA improvements in their community. Utilizing 2016 program year CDBG funds the City of Fraser will be installing ADA compliant sidewalks.

4.5 PROGRAM YEAR 2017

Lack of Fair Housing Education and Awareness

1. Macomb County provided funding to the Fair Housing Center of Metropolitan Detroit for the purpose of investigating fair housing complaints and training
2. Continental Management, the management company for the County HOME-funded Oakwood Senior Housing facility, required all employees to complete Fair Housing training within 90 days of hire
3. Macomb County contracted with Affirmations to provide Fair Housing and LGBTQ+ training, which was attended by community partners as well as County staff from various departments

Racial and Ethnic Minorities are Concentrated Geographically within the County

While not federally funded, the County addressed this impediment through its diversity and inclusion initiative (OneMacomb). On Macomb was sparked by a comprehensive study titled, "The New Macomb County" prepared in partnership with Macomb Community College, Macomb County, and Data Drive Detroit in 2012. The study documented the County's changing demographics and the need to embrace our current and future make up of citizens that make Macomb their home.

ADA Education

The communities that participate in the Macomb Urban County CDBG program are encouraged to use CDBG funding for ADA improvements in their community. During the 2017 program year the City of Richmond used CDBG funds to install ADA-compliant sidewalks.

4.6 PROGRAM YEAR 2018

Lack of Fair Housing Education and Awareness

1. Macomb County provided funding to the Fair Housing Center of Metropolitan Detroit for the purpose of investigating fair housing complaints and training

- a. Training sessions included “Fair Housing & Support Animals” held on May 9, 2019 by the Fair Housing Center of Metropolitan Detroit; and, “Tenant Rights Learning Session” held on April 16, 2019 by Lakeshore Legal Aid
2. Continental Management, a management company for the County HOME funded senior housing facility, required all employees to complete Fair Housing Training within 90 days of hire

Racial and Ethnic Minorities are Concentrated Geographically within the County

While not federally funded, the county addressed this impediment through its diversity and inclusion initiative (One Macomb). One Macomb was sparked by a comprehensive study titled, “The New Macomb County” which was prepared in 2012 in partnership with Macomb Community College, Macomb County, and Data Drive Detroit. The study documented the County’s changing demographics and the need to embrace our current and future citizen make up that make Macomb County their home.

5.0 OVERVIEW OF COMMUNITY INPUT

On January 28, 2019 the County conducted a public meeting for housing providers which was located in the Macomb County Family Resource Center. The County conducted a second public meeting for the general public on February 13, 2019. It was located in the Macomb County Family Resource Center.

5.1 OPEN DISCUSSION – FAIR HOUSING NEEDS AND CONCERNS

In an effort to provide an environment that would allow for all attendees to participate, an open discussion where citizens were asked to discuss issues and concerns publicly was conducted. During the open discussion citizens were asked to speak their mind on fair housing issues and concerns affecting their respective community. Through this process many issues were brought to the Macomb County Team’s attention. Listed below are issues that were discussed during the open discussion:

- Transportation barriers. Lack of public transportation
 - Job centers should connect to affordable housing
- Education for Landlords
 - Domestic Violence
 - Section 8 Housing Vouchers
 - Too much “red tape”
- Accessibility in older buildings/units
- Affordable housing
 - As the economy has improved the costs to own a home has increased and become less affordable
 - Rental costs have increased as the economy has improved
 - Discrimination against single mothers and people of color

5.2 SURVEY – FAIR HOUSING NEEDS AND CONCERNS

In an effort to provide an environment that would allow for all attendees to participate, citizens were asked to fill out a survey. They were also able to openly discuss concerns with the project team. Listed below are the issues that were discussed and gathered from survey input:

- People of color directed to renting or buying homes in certain neighborhoods
- Some housing providers refuse to rent to individual based on age
- Lack of knowledge about fair housing among general public

6.0 FAIR HOUSING COMPLAINTS, CHALLENGES, AND IMPEDIMENTS

Fair Housing Complaint Activity

Citizens of Macomb County who believe they have experienced fair housing discrimination may file their complaints through entities, including but not limited to: the State of Michigan Department of Civil Rights (MDCR); the Fair Housing Center of Metropolitan Detroit (FHCMD); and the HUD Detroit Office of Fair Housing and Equal Opportunity (FHEO).

As part of the AI, the FHCMD and the FHEO were contacted and requested to provide summary information about cases that had been filed by or against organizations or residents in Macomb County. Presented in **Tables 44-49** is the provided fair housing complaint data dating back to 2014.

Table 44: Fair Housing Complaint Activity (2014)

Intake Number	Date Received	Type of Inquiry	Property City	Property Type	Complaint Source	Follow Up
05-14-1680-8	9/17/2014	Race	Centerline	No Data	FHEO	No Cause
05-14-1207-8	7/17/2014	Disability	Chesterfield Township	No Data	FHEO	Withdrawn after Resolution
05-14-1240-8	6/18/2014	Disability	Chesterfield Township	No Data	FHEO	Conciliation/ Settlement
05-14-0490-8	2/6/2014	Race, Sex, Disability	Chesterfield Township	No Data	FHEO	No Cause
05-15-0105-8	10/30/2014	Race	Macomb Township	No Data	FHEO	Withdrawn after Resolution
05-14-1670-8	9/19/2014	Race	Mount Clemens	No Data	FHEO	Conciliation/ Settlement
05-14-0397-8	1/17/2014	Disability	New Baltimore	No Data	FHEO	No Cause
05-14-1482-8	9/2/2014	Race	New Baltimore	No Data	FHEO	Withdrawn after Resolution
05-14-0736-8	4/2/2014	Disability	Shelby Township	No Data	FHEO	No Cause
05-14-0838-8	4/18/2014	Race, Disability	Shelby Township	No Data	FHEO	No Cause
05-14-0724-8	4/2/2014	Disability	Utica	No Data	FHEO	No Cause
05-14-1169-8	6/20/2014	Race, Disability	Washington Township	No Data	FHEO	No Cause
14-020	3/18/2014	Physical Handicap	Shelby Township	Rental	FHCMD	Test
14-054	8/20/2014	Physical Handicap	Mount Clemens	Rental	FHCMD	Advise/Counsel
14-058	8/28/2014	Physical Handicap	Harrison Township	Rental	FHCMD	Test

Source: Fair Housing Center of Metro Detroit (2014-2018), HUD Fair Housing and Equal Opportunity (2014-2019)

In 2014, there were seventeen reported cases of housing discrimination in Macomb County. Of these seventeen cases, thirteen were based on disability or handicap. Seven of the seventeen cases included

discrimination against race. There was not one predominant city in which these cases took place, discrimination based on race and disability occurred throughout the county. All cases received a follow-up where appropriate.

Table 45: Fair Housing Complaint Activity (2015)						
Intake Number	Date Received	Type of Inquiry	Property City	Property Type	Complaint Source	Follow Up
05-15-0868-8	5/9/2015	Disability	Eastpointe	No Data	FHEO	Withdrawn after Resolution
05-15-1361-8	8/27/2015	Race	Eastpointe	No Data	FHEO	No Cause
05-16-0020-8	10/8/2015	Familial Status	Eastpointe	No Data	FHEO	No Cause
05-15-0739-8	4/7/2015	Race	Harrison Township	No Data	FHEO	No Cause
05-15-0796-8	4/22/2015	Familial Status	Macomb Township	No Data	FHEO	Charged or FHAP Caused
05-15-1289-8	8/18/2015	Disability	Macomb Township	No Data	FHEO	No Cause
05-15-1417-8	9/30/2015	Disability	Macomb Township	No Data	FHEO	Conciliation/ Settlement
05-15-0688-8	2/23/2015	Disability	Shelby Township	No Data	FHEO	No Cause
05-15-0733-8	1/30/2015	National Origin, Familial Status	Shelby Township	No Data	FHEO	No Cause
05-15-0883-8	5/8/2015	Disability	Shelby Township	No Data	FHEO	No Cause
05-15-1036-8	6/2/2015	Disability	Shelby Township	No Data	FHEO	Conciliation/ Settlement
05-15-1392-8	9/24/2015	Disability	Shelby Township	No Data	FHEO	Withdrawn after Resolution
15-027	4/23/2015	Familial Status	Mount Clemens	Rental	FHCMD	Test
15-054	8/31/2015	Color, Race	Eastpointe	Rental	FHCMD	Hold for more information
15-076	11/23/2015	Mental Handicap, Race, Sex	Eastpointe	Sales	FHCMD	Advise/Counsel

Source: Fair Housing Center of Metro Detroit (2014-2018), HUD Fair Housing and Equal Opportunity (2014-2019)

During the year of 2015, there were a total of twenty reported fair housing complaints between the FHCMD and the FHEO. There were nine complaints filed based on disability or handicap, and eight complaints filed based on race or color. Several complaints were also filed regarding discrimination based on sex, national origin, and familial status. There were five complaints within the City of Eastpointe which is a city that has high concentrations of minority populations and low/moderate income households. Of the five complaints in Shelby Township, four were for disability discrimination.

Table 46: Fair Housing Complaint Activity (2016)

Intake Number	Date Received	Type of Inquiry	Property City	Property Type	Complaint Source	Follow Up
05-16-5316-8	9/3/2016	Race, Disability	Centerline	No Data	FHEO	Conciliation/ Settlement
05-17-5590-8	10/3/2016	Race	Eastpointe	No Data	FHEO	No Cause
05-16-4648-8	4/25/2016	Familial Status	Harrison Township	No Data	FHEO	Withdrawn after Resolution
05-16-4235-8	1/21/2016	Race, Retaliation	Mount Clemens	No Data	FHEO	No Cause
05-16-4581-8	4/19/2016	Race, Sex	Shelby Township	No Data	FHEO	Conciliation/ Settlement
05-16-4652-8	5/2/2016	Familial Status	Utica	No Data	FHEO	Advise/Counsel
16-012	1/28/2016	Race	Shelby Township	Mortgage Financing	FHCMD	Advise/Counsel
16-050	4/7/2016	Familial Status	Macomb Township	Rental	FHCMD	Advise/Counsel, Test
16-056	4/21/2016	Mental Handicap	Shelby Township	Rental	FHCMD	Advise/Counsel, Test
16-076	5/25/2016	Race	Harrison Township	Rental	FHCMD	Advise/Counsel
16-088	6/8/2016	Race	Eastpointe	Sales	FHCMD	Advise/Counsel, Test
16-099	6/29/2016	Physical Handicap	New Baltimore	Rental	FHCMD	Advise/Counsel
16-101	6/30/2016	Color, Race	Harrison Township	Rental	FHCMD	Advise/Counsel
16-113	8/11/2016	Mental Handicap, Physical Handicap	Fraser	Rental	FHCMD	Advise/Counsel, Test
16-133	9/19/2016	Race	Eastpointe	Rental, Sales	FHCMD	Advise/Counsel, Test
16-136	9/27/2016	Other-Military Service, Physical Handicap	Shelby Township	Rental	FHCMD	Advise/Counsel, Test
16-137	9/27/2016	Other-Ex-Offender, Physical Handicap	Shelby Township	Rental	FHCMD	Advise/Counsel, Test
16-138	9/27/2016	Other-Ex-Offender, Physical Handicap	Shelby Township	Rental	FHCMD	Advise/Counsel
16-166	11/18/2016	Other-Ex-Offender	Eastpointe	Rental	FHCMD	Conciliation/ Settlement
16-176	12/8/2016	Race	Fraser	Rental	FHCMD	No Cause

Source: Fair Housing Center of Metro Detroit (2014-2018), HUD Fair Housing and Equal Opportunity (2014-2019)

In 2016, there were twenty-two reported complaints against fair housing in Macomb County. There were eight complaints filed because of disability or handicap. Of these complaints, half were filed in Shelby Township. There were eleven complaints based on race, and four of them came out of

Eastpointe. Familial Status was another protected class in which several complaints were filed. Each case received a follow-up where appropriate.

Table 47: Fair Housing Complaint Activity (2017)

Intake Number	Date Received	Type of Inquiry	Property City	Property Type	Complaint Source	Follow Up
05-18-9893-8	11/17/2017	Disability	Centerline	No Data	FHEO	No Cause
05-18-0257-8	10/26/2017	Race	Eastpointe	No Data	FHEO	No Cause
05-17-6874-8	1/6/2017	Familial Status	Eastpointe	No Data	FHEO	No Cause
05-17-9123-8	7/14/2017	Race	Eastpointe	No Data	FHEO	No Cause
05-17-7912-8	4/10/2017	Race	Fraser	No Data	FHEO	No Cause
05-17-7414-8	2/7/2017	Disability	Harrison Township	No Data	FHEO	No Cause
05-17-7200-8	2/16/2017	Race, Familial Status	Macomb Township	No Data	FHEO	Conciliation/ Settlement
05-17-8539-8	3/4/2017	National Origin	Macomb Township	No Data	FHEO	No Cause
05-17-7054-8	2/7/2017	Familial Status	Mount Clemens	No Data	FHEO	No Cause
05-17-8671-8	7/17/2017	Disability	Mount Clemens	No Data	FHEO	No Cause
05-18-0255-8	10/18/2017	National Origin	New Baltimore	No Data	FHEO	Conciliation/ Settlement
05-17-8933-8	8/2/2017	Disability	Utica	No Data	FHEO	No Cause
17-064	4/11/2017	Income Source, Physical Handicap, Race	Eastpointe	Rental	FHCMD	Test
17-091	5/10/2017	Income Source	Centerline	Rental	FHCMD	Advise/Counsel, Test
17-112	6/12/2017	Familial Status	Eastpointe	Rental	FHCMD	Advise/Counsel
17-144	7/27/2017	Age	Shelby Township	Rental	FHCMD	Advise/Counsel, Hold for more information, Information Gathering, Test
17-193	10/17/2017	National Origin	New Baltimore	Condo	FHCMD	Advise/Counsel, Hold for more information, Information Gathering
17-224	12/7/2017	Mental Handicap, National Origin	Shelby Township	Mortgage Financing	FHCMD	Advise/Counsel, Information Gathering

Source: Fair Housing Center of Metro Detroit (2014-2018), HUD Fair Housing and Equal Opportunity (2014-2019)

In 2017, there were twenty cases that reported discrimination against protected classes in housing choice. The cases report that Macomb County experienced discrimination issues based on race, disability or handicap, age, national origin, familial status, and income source. There were eight reports of discrimination based on disability or handicap, six reports based on race, and four reports for both familial status and national origin discrimination. Of the twenty cases, a quarter of them came from Eastpointe. Each case received a follow-up where appropriate.

Table 48: Fair Housing Complaint Activity (2018)

Intake Number	Date Received	Type of Inquiry	Property City	Property Type	Complaint Source	Follow Up
05-18-1503-8	4/18/2018	Race, Retaliation	Centerline	No Data	FHEO	No Cause
05-18-2855-8	7/23/2018	Disability	Fraser	No Data	FHEO	No Cause
05-18-2943-8	9/20/2018	Color	Fraser	No Data	FHEO	Open
05-19-4299-8	10/23/2018	Disability	Harrison Township	No Data	FHEO	Open
05-18-0893-8	2/23/2018	Disability	Macomb Township	No Data	FHEO	Conciliation/ Settlement
05-18-2162-8	6/1/2018	Race, Disability	Macomb Township	No Data	FHEO	No Cause
05-19-3100-8	10/12/2018	Race, Color	Macomb Township	No Data	FHEO	Withdrawn after Resolution
05-19-3469-8	11/9/2018	Familial Status	Macomb Township	No Data	FHEO	No Cause
05-19-4307-8	11/8/2018	Race	Macomb Township	No Data	FHEO	No Cause
05-19-3518-8	10/22/2018	Disability	Macomb Township	No Data	FHEO	Withdrawn after Resolution
05-19-4328-8	11/6/2018	Disability, Retaliation	Macomb Township	No Data	FHEO	Open
05-18-0527-8	1/25/2018	Race	Mount Clemens	No Data	FHEO	No Cause
05-18-0996-8	3/16/2018	Familial Status	Shelby Township	No Data	FHEO	Open
05-18-3149-8	9/20/2018	Disability	Shelby Township	No Data	FHEO	No Cause
05-18-3150-8	9/19/2018	Disability	Shelby Township	No Data	FHEO	No Cause
18-019	1/22/2018	Age, Disability	New Baltimore	Rental	FHCMD	Advise/Counsel, Information Gathering
18-031	2/26/2018	Familial Status	Utica	Rental	FHCMD	Advise/Counsel, Hold for more information, Information Gathering
18-068	4/23/2018	Race	Chesterfield Township	Rental	FHCMD	Advise/Counsel, Test
18-086	5/8/2018	Age, Race	Chesterfield Township	Rental	FHCMD	Advise/Counsel, Information Gathering
18-092	5/21/2018	Race	Macomb Township	Rental	FHCMD	Advise/Counsel, Information Gathering
18-153	8/15/2018	National Origin	Fraser	Co-Op	FHCMD	Advise/Counsel
18-165	8/27/2018	Race	Chesterfield Township	Rental	FHCMD	Test
18-173	9/11/2018	Physical Handicap	Shelby Township	Rental	FHCMD	Information Gathering
18-181	9/13/2018	Familial Status, Sex	Lenox Township	Rental	FHCMD	Information Gathering
18-195	9/24/2018	Age, Familial Status, Mental Handicap	Chesterfield Township	Rental	FHCMD	Information Gathering

Table 48: Fair Housing Complaint Activity (2018)

Intake Number	Date Received	Type of Inquiry	Property City	Property Type	Complaint Source	Follow Up
18-218	10/9/2018	Physical Handicap	Macomb Township	Rental	FHCMD	Advise/Counsel
18-236	10/22/2018	Race	Macomb Township	Rental	FHCMD	Information Gathering

Source: Fair Housing Center of Metro Detroit (2014-2018), HUD Fair Housing and Equal Opportunity (2014-2019)

There were thirty-three reported cases of discrimination in Macomb County during 2018. Among the thirty-three cases reported, sixteen were based on discrimination against disability or handicap. In addition, nearly a third (ten) of the total thirty-three cases occurred in Macomb Township. All of the cases were received a follow-up, with the exception of five cases that are still open.

Table 49: Fair Housing Complaint Activity (2019)

Intake Number	Date Received	Type of Inquiry	Property City	Property Type	Complaint Source	Follow Up
05-19-4329-8	3/7/2019	Familial Status, Retaliation	Centerline	No Data	FHEO	Open

Source: Fair Housing Center of Metro Detroit (2014-2018), HUD Fair Housing and Equal Opportunity (2014-2019)

As of May 2019, there has only been one reported case of housing discrimination. It occurred in the City of Centerline and was based on familial status. The case remains open.

While most of the general demographics provided for Macomb County, Michigan are intended to paint a picture of the overall make-up of the community, the information can also point to some issues that may be influencing fair housing conditions and possibly impeding fair housing choice. The continued isolation of certain demographic groups in the County indicates challenges in breaking down racial barriers to foster an environment conducive to integration. Poverty and the myriad challenges that face households experiencing poverty reduces housing choice and often contributes to isolation. Finally, the protected classes continue to experience discrimination and often face more housing problems than other demographics.

Examination of the latest available HMDA data for the Warren-Troy-Farmington Hills MI MSA/MD at the Census Tract level showed that lending practices of financial institutions in the area may be interpreted to be an impediment to fair housing choice for minorities. Although discriminatory lending practices cannot be definitively identified by correlation of HMDA data elements, the data can display patterns in lending practices. In this case, analysis of the data revealed that minority applicants, overall, have lower rate of origination and higher rate of denial. Since analysis of the data cannot conclusively determine a correlation unless a more sophisticated analysis is done, which will take into account other factors affecting underwriting decisions; and since the analysis undertaken for the above-referenced area indicates a certain degree of discrimination in lending based on minority racial/ethnic characteristics of the property location, it may be inferred that lending issues and/or credit issues may play a role in the

outcome of the analysis. This outcome calls for a unified approach in which both the private sector and the public sector would work together to first identify the causes for the higher rate of denial and second find a solution.

The AI analysis pointed to an aging population with an increase in elderly residents and fewer households with children. This will have an effect in housing needs and choice. This demographic shift will increase the demand for assisted living units with accessible features and other adaptive changes to residential buildings. According to the report much of the region's housing stock is designed to meet the needs of families with children. As residents' health, lifestyle and preferences change due to age and physical ability, certain barriers such as narrow doors, hallways, etc. become impediments. Racial and ethnic minorities are concentrated in geographical regions particularly in urban municipalities, where older housing stock is located. Generally speaking, the concentration of racial and ethnic minorities coincides with the concentration of lower income households.

In addition, review of the State of Michigan Building Code, which is the document followed by the County when rehabilitating dwelling units, and review of Michigan Planning Enabling Act – Act 33 of 2008- revealed that there were no specific rules or policies addressing the needs of persons with disabilities except for those persons residing in residential facilities (group homes).

Based on the above and analysis of data available, the following impediments, recommendations, and actions to reduce impediments to Fair Housing within Macomb County have been formulated.

The U.S. Department of Housing and Urban Development requires an identification of the Fair Housing challenges facing the County. To accomplish this task, the identification was based on the intersection of the data collected for the plan, the information gathered during the stakeholder meeting, the results of public comment, and fair housing activity over the course of the past several years. The more a topic intersected within these forms of information, the higher the priority that should be placed.

After the challenges were identified, goals and action items to address fair housing issues were required to be created. Consideration had to be given to certain constraints and/or realities facing the County like staffing, funding, etc.

In addition, the support from local organizations and nonprofits on fair housing issues need to be considered. The results are a set of goals and action items for the five-year period of the plan.

The following are the Fair Housing issues facing Macomb County. The challenges identified are based on the process outlined above.

- Geographic Isolation of Minorities
 - Higher percentages of minority populations within the Macomb County CDBG, ESG Jurisdiction tend to be confined to the City of Eastpointe, parts of Mount Clemens and Center Line. While white populations live throughout the County, high percentages of

African American Population reside within the City of Eastpointe, parts of Mount Clemens and Center Line. These areas consist of more than 30% African American population. These areas also report a higher poverty rate than the County as a whole.

- Substandard Housing
 - A significant portion of the population suffers from at least one of the following housing issues: crowding, cost burden (greater than 30% or 50%), and other insufficiencies within of the physical structure. Housing problems are more prevalent among those with a household income below 50% AMI. This is true among both renter and owner-occupied households. Minority populations and larger households experience housing problems at a much higher rate than White households. African American households are the most affected.
- Discrimination
 - Minority populations had fewer loans originated and greater loan denial than their White counterparts; however, the discrepancies are not extreme. Areas identified to have higher percentages of African American population tend to have a lower number of mortgage loan originations when compared to other areas of the County. Despite that, a discrepancy of this type may impact housing choice for minority populations. Certain populations may be refused rental or directed to a particular neighborhood.
- Affordability Challenges
 - Cost of owning homes and paying rent is a burden for many populations. Specifically, those with a household income below 50% AMI. African American households experience cost burden at a much higher rate than White households.

Placement of new or rehabilitated affordable housing for lower-income people is one of the most controversial issues communities can face. If fair housing objectives are to be achieved, the goal must be to avoid high concentrations of low-income housing. “NIMBYism” seriously affects the availability of housing for low-income families, persons with disabilities, homeless persons, or lower-income minorities and is one of the most difficult challenges jurisdictions encounter in promoting fair housing objectives. The attitude of local government officials, public pronouncements of general policy, and careful planning and implementation of individual housing efforts by providers are key aspects for overcoming resistance of this kind. In addition, contextual planning of new affordable housing with relationship to scale, size, density, and architectural character of the neighborhoods where it will be located is vital to integration and success.

- Accessibility Challenges
 - There is a lack of public transportation for lower income populations within Macomb County (especially north of M-59), as well as lack of affordable housing in proximity to job centers.

- Fair Housing Awareness and Education
 - There is a lack of awareness of Fair Housing practices among landlords and the general public. This is a continued struggle for communities to adequately provide education and awareness specific to fair housing.
- Complaints Filed Specific to Rental Housing
 - A number of complaints were filed since 2014 specific to those being refused rental housing. The types of inquiries include those claiming discrimination based on a disability, race, and familial status.
- There is a lower rate of loan origination among minority populations
 - The County should do more in reviewing their current policies and procedures in light of private sector (e.g. banking, financial institutions, real estate brokers, and insurance companies) practices to determine what, if any, changes might be made to strengthen their role where private sector practices appear to discriminate or otherwise contribute to restricted housing choice. Thus, Macomb County, along with participating communities, should review lending and appraisal practices through formal surveys or informal means to examine their policies, procedures, and practices for possible differential treatment of home mortgage loans, home insurance, or home improvement loans based on race, ethnicity, gender, disability status, and familial status.

7.0 IMPEDIMENTS AND ACTION ITEMS

7.1 IMPEDIMENT #1 – ENSURE FAIR HOUSING REPORTS ARE SHARED WITH LENDING INSTITUTIONS, HOUSING PROVIDERS, AND PARTICIPATING COMMUNITIES

Action: *Increase efforts to provide fair housing reports to the public and private sectors, initiate dialogue, and solicit assistance.*

Recommendation #1: Macomb County should make the AI and preceding fair housing reports available to all lending institutions in the study area. The purpose of the dialogue is to discuss the impediments to fair housing, assess fair housing efforts, and seek commonality and participation in fair housing efforts.

Recommendation #2: The findings and reports from the Fair Housing Center of Metropolitan Detroit should be shared with housing providers, community development corporations, developers, lenders, participating communities and other stakeholders. Macomb County is involved in the SE Michigan Housing Task Force. Impediment #1 is linked to Impediment #2, as noted below.

Recommendation #3: Initiate dialogue with local lending institutions and seek their commitment and assistance in responding to the findings in the AI and other fair housing reports. After the AI is made available to the local lending institutions; a dialogue should be initiated aimed at seeking their commitment to participate in the dissemination of fair housing information and education for the responsible use of credit.

7.2 IMPEDIMENT #2 – LACK OF FAIR HOUSING EDUCATION, AWARENESS, AND INFORMATION WITHIN THE PUBLIC SECTOR AND THE PRIVATE SECTOR

The County has started efforts to disseminate fair housing information to public housing agencies, municipalities and the public. However, a review of the County and lending institutions websites revealed that fair housing education, housing discrimination complaint resources, and other fair housing-related information is scarce.

Action: *Improve coordination of Fair Housing Education Efforts through deliberate and targeted strategies.*

Recommendation #4: The County should include links on its website to agencies that provide fair housing information or services such as the Fair Housing Center of Metropolitan Detroit and the Fair Housing and Equal Opportunity (FHEO) Office of HUD.

Recommendation #5: The County should request that all Urban County participating communities and those communities participating in the HOME Consortium include fair housing information on their website, link to fair housing agencies, and fair housing information in applications for funding, including the fair housing logo and where to file fair housing complaints.

Recommendation #6: The County should request all Urban County participating communities that have Housing Commissions (cities of Eastpointe, Mount Clemens and New Haven) to encourage the Housing Commissions to post fair housing information on their websites, at the housing developments, and in applications for funding, including the fair housing logo and where to file fair housing complaints.

Recommendation #7: The County should coordinate with local lending institutions for the provision of fair housing information and housing and credit counseling information through its website. The County should include fair housing information in their main website. Additionally, links to other entities offering housing and credit counseling should be enabled as well.

Action: Increase efforts to disseminate fair housing information and educate local officials, employees and residents on fair housing laws

Recommendation #8: The County should use existing resources and programs to disseminate fair housing information and provide fair housing education on fair housing laws and best practices to local officials, landlords, and the general public. The County should utilize other media outlets and avenues to disseminate fair housing information to the public, among others: cable TV, newsletters, pamphlets, fairs, and public announcements. The County should include fair housing information in related training opportunities and meetings with participating communities.

Recommendation #9: The County should request and use HUD Technical Assistance in implementing strategies to further fair housing.

Action: Increase the availability of fair housing materials through electronic means and ensure that the fair housing logo and fair information is included in all related housing materials.

Recommendation #10: The County should request participating communities and public housing agencies to include fair housing logo and information in all materials in electronic format.

Steps to achieve some of these recommendations has been accomplished during the previous AI. The County should continue to strive to achieve the above stated recommendations. It is anticipated that this coordination can start during the first year of implementation of the AI. Posting of the fair housing and credit counseling information in the website is anticipated to occur during the second year of the AI and posting of the fair housing and credit counseling information in the local lending institutions is anticipated to occur during the third year of the AI and should be monitored on an ongoing basis as bank mergers occur.

7.3 IMPEDIMENT #3 – RACIAL AND ETHNIC MINORITIES ARE CONCENTRATED GEOGRAPHICALLY WITHIN THE COUNTY

According to the 2013-2017 American Community Survey Data the number of minority residents within Macomb County continues to rise. The most substantial increases are within the Asian, Hispanic, and African American populations.

The County should look into the real estate practices, and the home-seeking choices made by African American and disabled residents to determine the extent of perceived or actual unlawful discriminatory practices, since those two groups are under-represented in the general population.

Action: *Review regulations and policies that may have an impact on the location, cost and supply of housing.*

Recommendation #11: The County should use existing public education programs, advocacy groups and regional groups such as the South East Michigan Housing Task Force, the Fair Housing Center of Metro Detroit, and HUD to spread information about the positive effects of affordable housing on local communities and help dispel myths.

Recommendation #12: The County, with participating communities, should increase local educational campaign on the community benefits of providing affordable and inclusive housing options.

7.4 IMPEDIMENT #4 – AVAILABILITY OF AFFORDABLE HOUSING FOR PROTECTED CLASSES

Challenges for providing new affordable housing within much of the Macomb County CDBG Jurisdiction are cost of land (especially north of M-59), NIMBY-ism, and lack of a coordinated effort and funding to develop programs to address affordable housing.

Efforts to address the future increase in demand for affordable housing have been one charge of the Macomb County Department of Planning and Economic Development (MCPED) and Macomb Community Action through initiatives seeking to establish collaborative efforts with key stakeholders throughout the County, Region, and State in order to address the evolving need of Macomb County's population.

Macomb County responded to the need for affordable housing by making it a priority need and seeking to address housing concerns in the coming years.

Recent coordination between Macomb County and participating jurisdictions is encouraging the participation by some participating communities in the purchase of tax foreclosed homes with the intent of rehabilitating homes and marketing them to income qualified individuals to increase affordable housing stock.

Current policy requires a community to purchase all tax foreclosures within its boundaries in a given year to participate. This could prove troublesome and discourage some communities from participating.

Action: Encourage the development affordable housing for the persons included in the protected classes

Recommendation #13: To address the increasing demand for affordable housing the County should work with participating communities, developers, and housing providers to develop programs that could rehabilitate existing tax forecloses homes to bring them back into functional use.

7.5 IMPEDIMENT #5 – ADA EDUCATION

Much like the State of Michigan as a whole, Macomb County has an aging population. As a result, the rate of individuals requiring accessibility accommodations is increasing. Some efforts have been made over the previous AI to encourage participating communities to utilize CDBG funding for ADA improvements within their respective communities.

Action: Continue and Evaluate and Improve ADA Education

Recommendation #14: The County should provide ADA education to their employees; provide contractors and builders with information packets regarding ADA requirements; post requirements on the County and City website, respectively; and incorporate ADA requirements in the development review and permitting process of housing construction and rehabilitation.

Recommendation #15: Continue funding the Macomb County Accessibility Program. This is a grant-funded program designed to make site-built residential homes in Macomb County more accessible to residents in need. This program currently serves eligible residents throughout the 21 participating Macomb County Communities.

7.6 IMPEDIMENT #6: LACK OF FORMALIZED FAIR HOUSING COMPLAINT AND MONITORING PROCEDURES

Although the County makes referrals for those who have experienced discrimination related to fair housing choice, the County does not have a formal fair housing complaint procedure.

Additionally, although the County monitors participating communities and sub-recipients, fair housing is not currently addressed during the monitoring process.

Action: Work to prepare a formalized fair housing complaint procedure and fair housing monitoring procedures

Recommendation #16: Macomb Community Action should work with the Macomb County Corporate Counsel and other relevant staff to prepare to procedure for filing fair housing complaints from residents. Additionally, the County should make this procedure and any resulting forms and documents available to participating communities.

Recommendation #17: Develop and implement a sub-recipient fair housing monitoring policy.

7.7 IMPEDIMENT #7: INCREASED COMPLAINT ACTIVITY WITHIN PARTICIPATING COMMUNITIES IN RECENT PROGRAM YEARS

Fair Housing Complaint Data collected from HUD's Office of Fair Housing and Equal Opportunity (FHEO), Michigan Civil Rights Commission, and the Fair Housing Center of Metro Detroit shows an increase in complaint activity within recent years. The majority of the complaint activity is based on disability status and race.

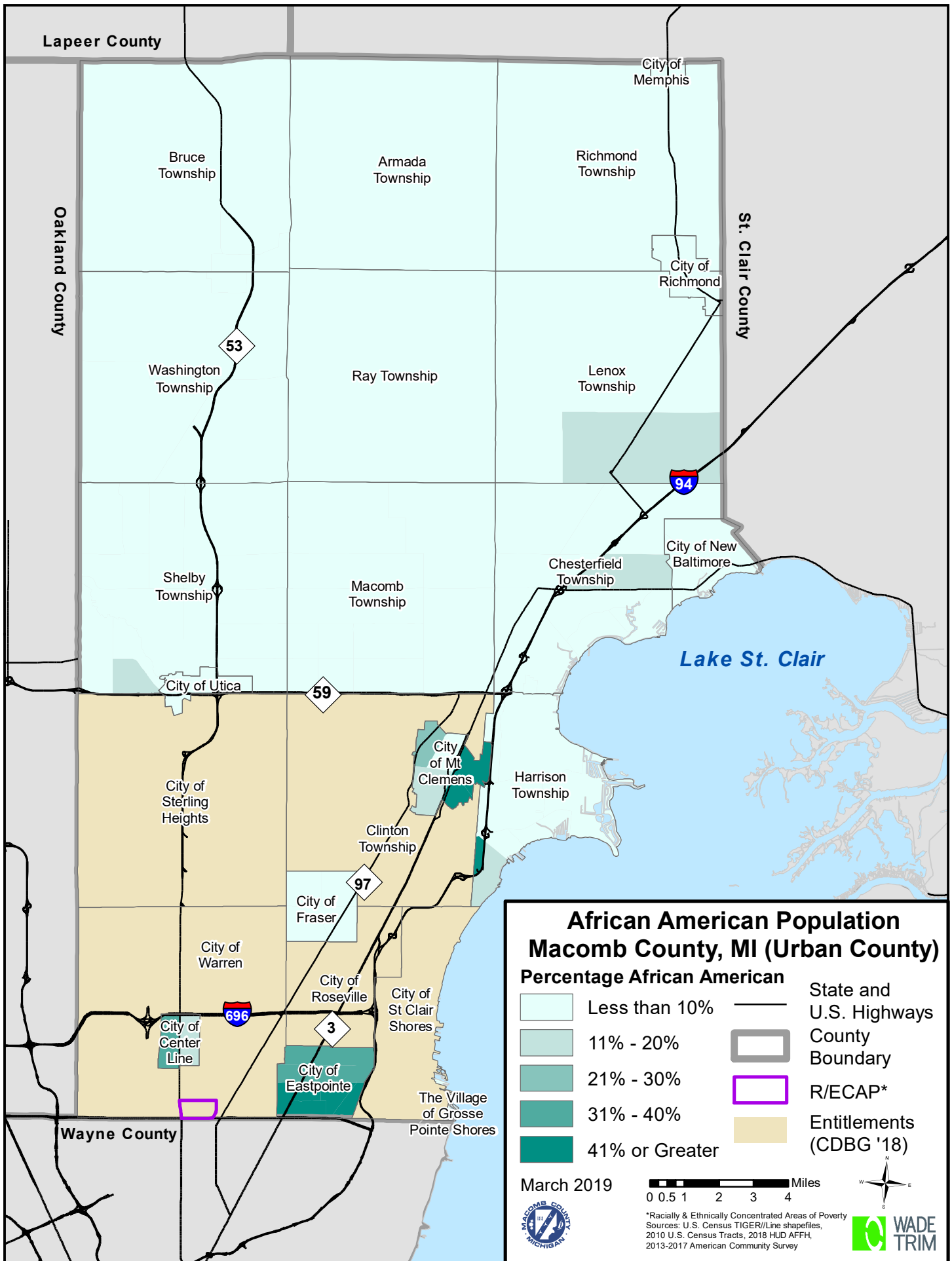
Action: Coordinate fair housing efforts within communities where complaint activity has increased

Recommendation #18: Macomb Community Action should work with participating communities where fair housing complaint activity has increased to understand the root cause for the increase. Additionally, the County should focus fair housing education, awareness, and programs within areas where fair housing choice may be an issue.

Recommendation #19: Develop and implement competitive funding allocation process, including fair housing-related criteria, for sub-grants to municipalities participating in the Urban County CDBG and/or County-led HOME Consortium.

LIST OF MAPS

1. Black/African American Population Map
2. Hispanic Population Map
3. Other Minority Race Population Map
4. Households with Persons 18 Years and Under Map
5. Population of Age 65 and Over Map
6. Poverty Status Map
7. Poverty Status for Minority Populations Map
8. Low- and Moderate-Income Areas Map
9. Disability Status Map
10. Rental Units Map
11. Mortgage Loan Origination Map
12. Integration Map



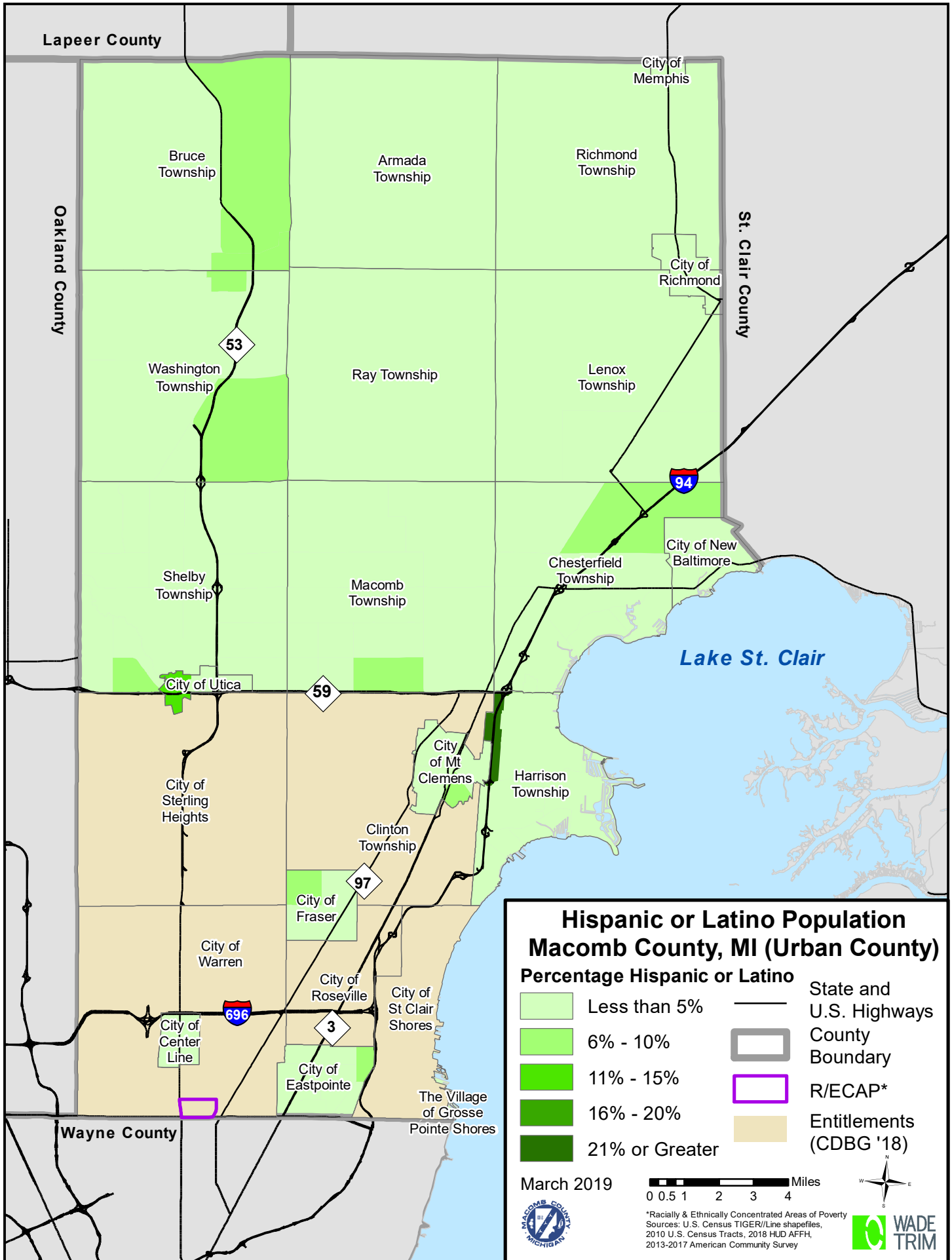
African American Population Macomb County, MI (Urban County)

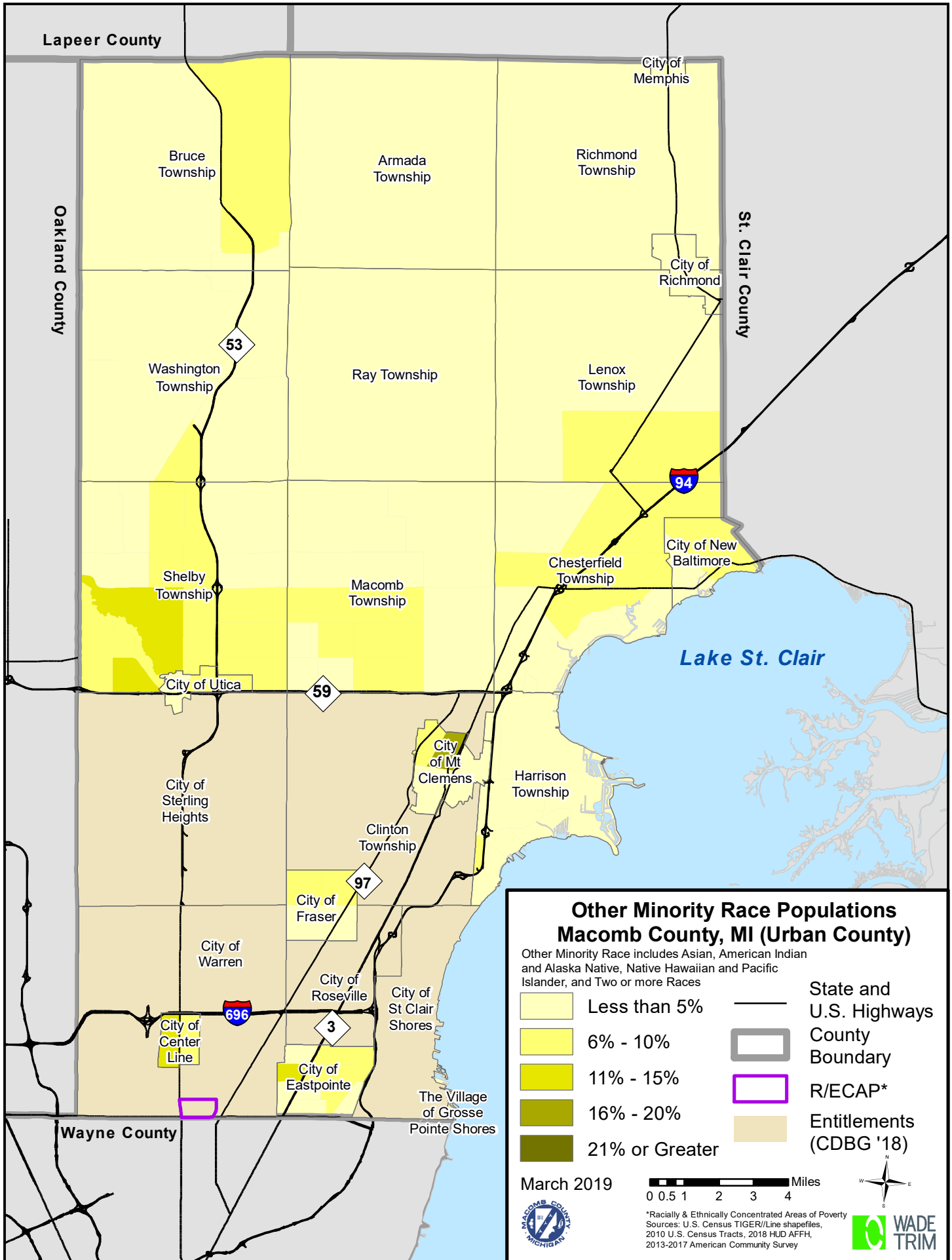
Percentage African American		State and U.S. Highways
	Less than 10%	
	11% - 20%	
	21% - 30%	
	31% - 40%	
	41% or Greater	Entitlements (CDBG '18)

March 2019

0 0.5 1 2 3 4 Miles

*Racially & Ethnically Concentrated Areas of Poverty
Sources: U.S. Census TIGER/Line shapefiles, 2010 U.S. Census Tracts, 2018 HUD AFFH, 2013-2017 American Community Survey



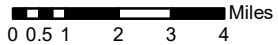


Other Minority Race Populations Macomb County, MI (Urban County)

Other Minority Race includes Asian, American Indian and Alaska Native, Native Hawaiian and Pacific Islander, and Two or more Races

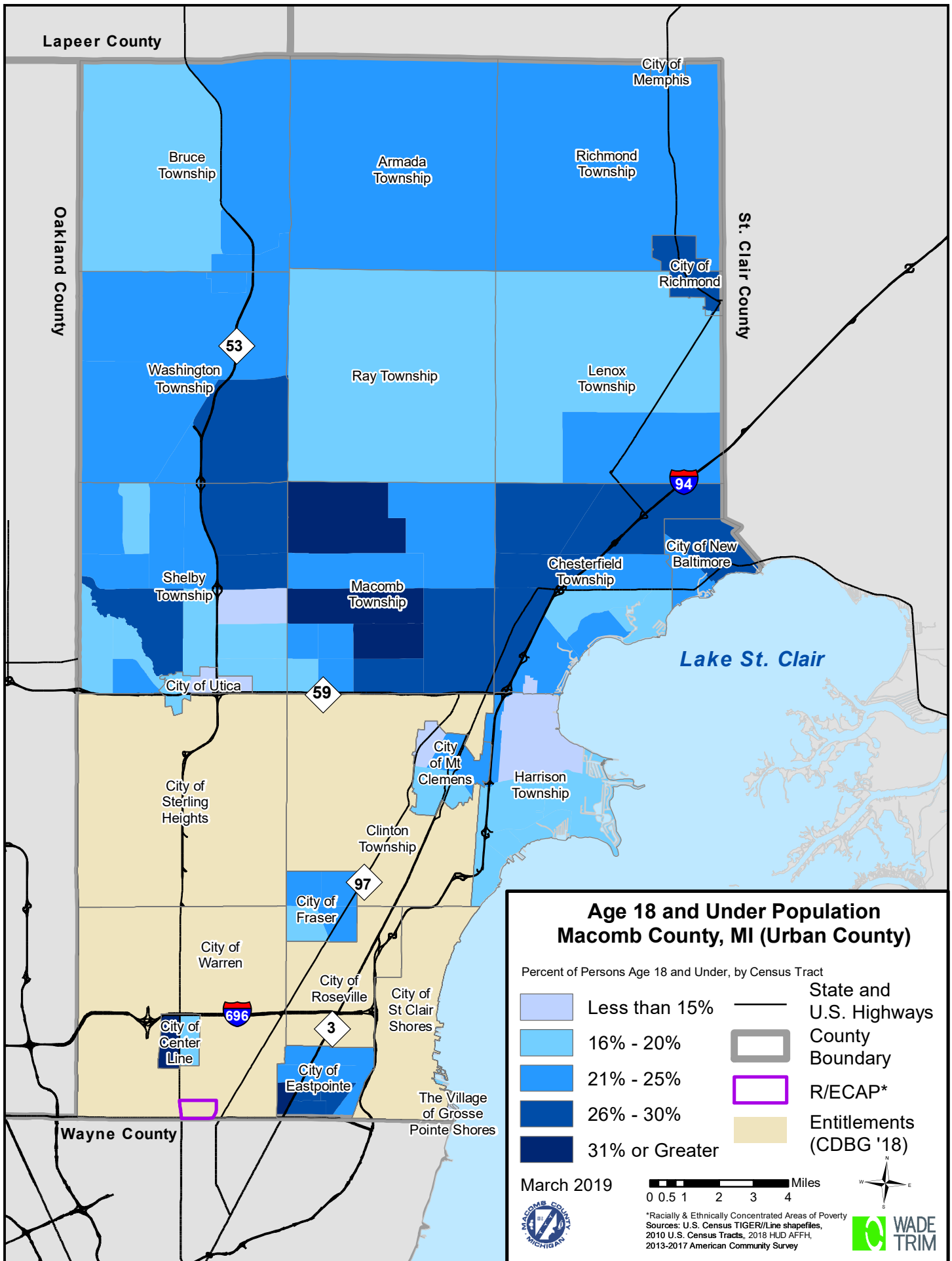
- | | | | |
|--|----------------|--|-------------------------|
| | Less than 5% | | State and U.S. Highways |
| | 6% - 10% | | County Boundary |
| | 11% - 15% | | R/ECAP* |
| | 16% - 20% | | Entitlements (CDBG '18) |
| | 21% or Greater | | |

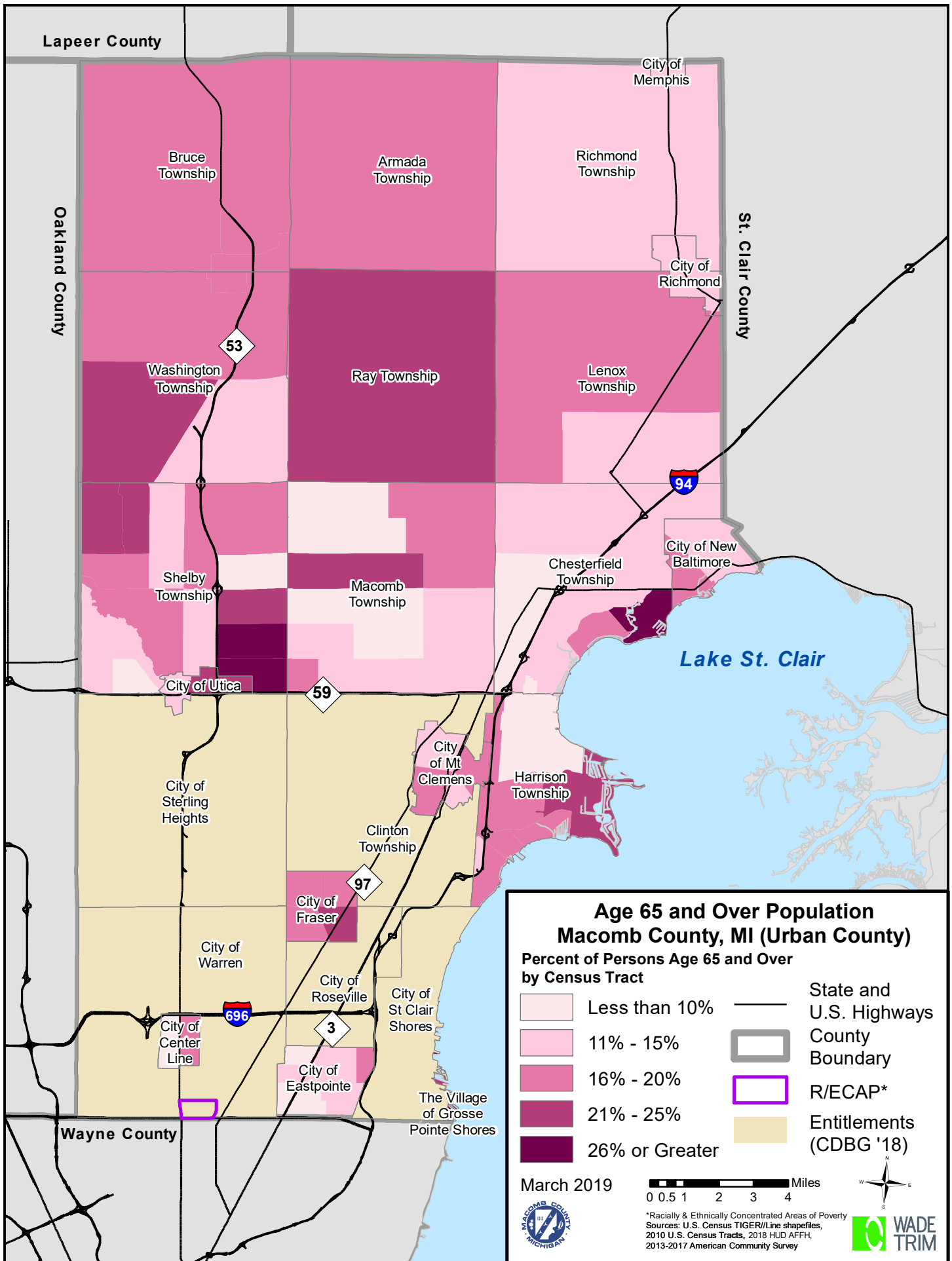
March 2019



*Racially & Ethnically Concentrated Areas of Poverty
Sources: U.S. Census TIGER/Line shapefiles, 2010 U.S. Census Tracts, 2018 HUD AFFH, 2013-2017 American Community Survey







Age 65 and Over Population Macomb County, MI (Urban County)

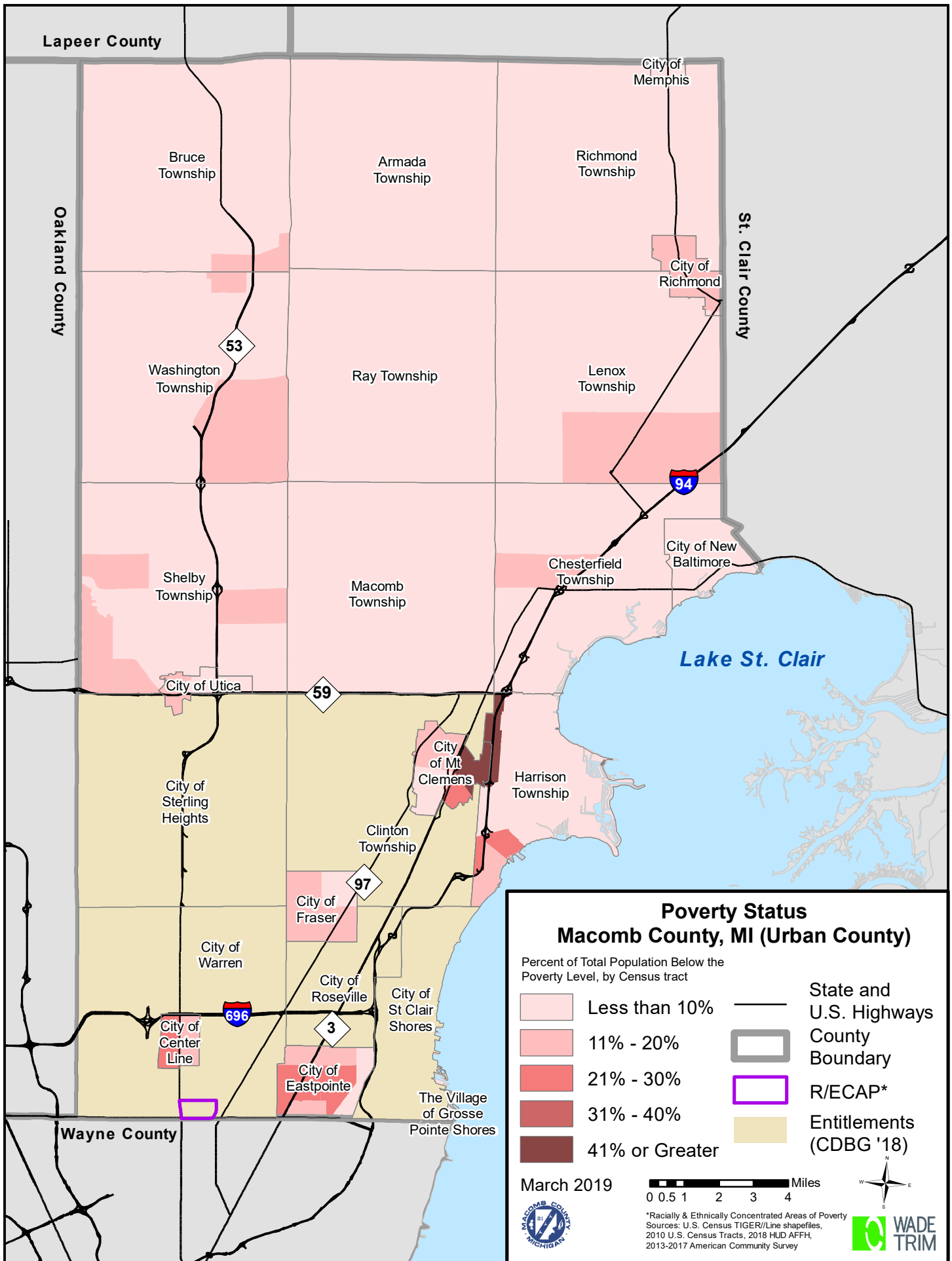
**Percent of Persons Age 65 and Over
by Census Tract**

<ul style="list-style-type: none"> Less than 10% 11% - 15% 16% - 20% 21% - 25% 26% or Greater 	<ul style="list-style-type: none"> State and U.S. Highways County Boundary R/ECAP* Entitlements (CDBG '18)
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March 2019

0 0.5 1 2 3 4 Miles

*Racially & Ethnically Concentrated Areas of Poverty
Sources: U.S. Census TIGER/Line shapefiles, 2010 U.S. Census Tracts, 2018 HUD AFFH, 2013-2017 American Community Survey



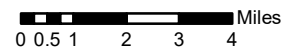
Poverty Status Macomb County, MI (Urban County)

Percent of Total Population Below the Poverty Level, by Census tract

- Less than 10%
- 11% - 20%
- 21% - 30%
- 31% - 40%
- 41% or Greater

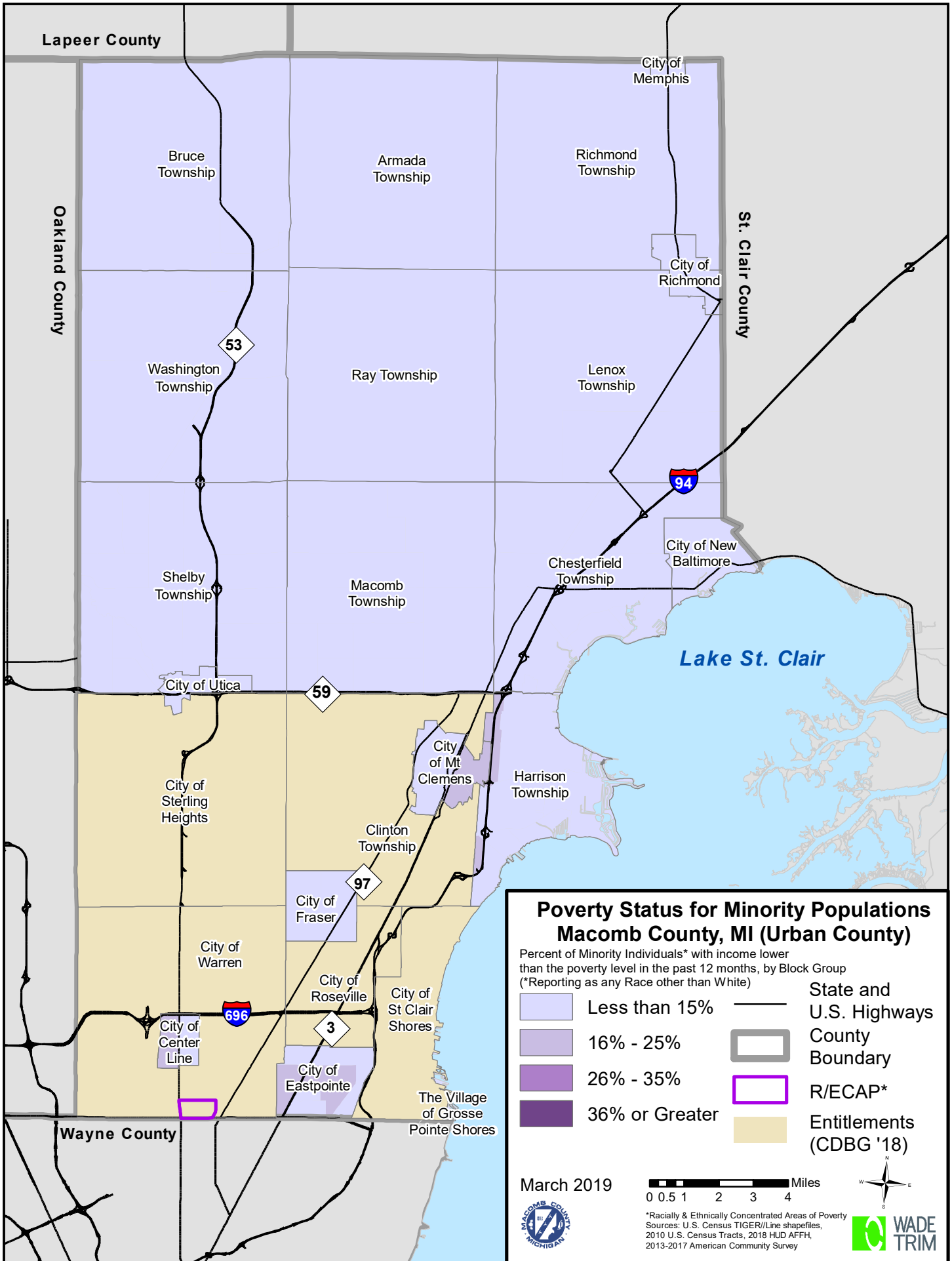
- State and U.S. Highways
- County Boundary
- R/ECAP*
- Entitlements (CDBG '18)

March 2019











*Racially & Ethnically Concentrated Areas of Poverty
Sources: U.S. Census TIGER/Line shapefiles, 2010 U.S. Census Tracts, 2018 HUD AFFH, 2013-2017 American Community Survey



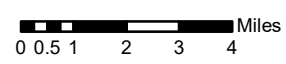


Poverty Status for Minority Populations Macomb County, MI (Urban County)

Percent of Minority Individuals* with income lower than the poverty level in the past 12 months, by Block Group
(*Reporting as any Race other than White)

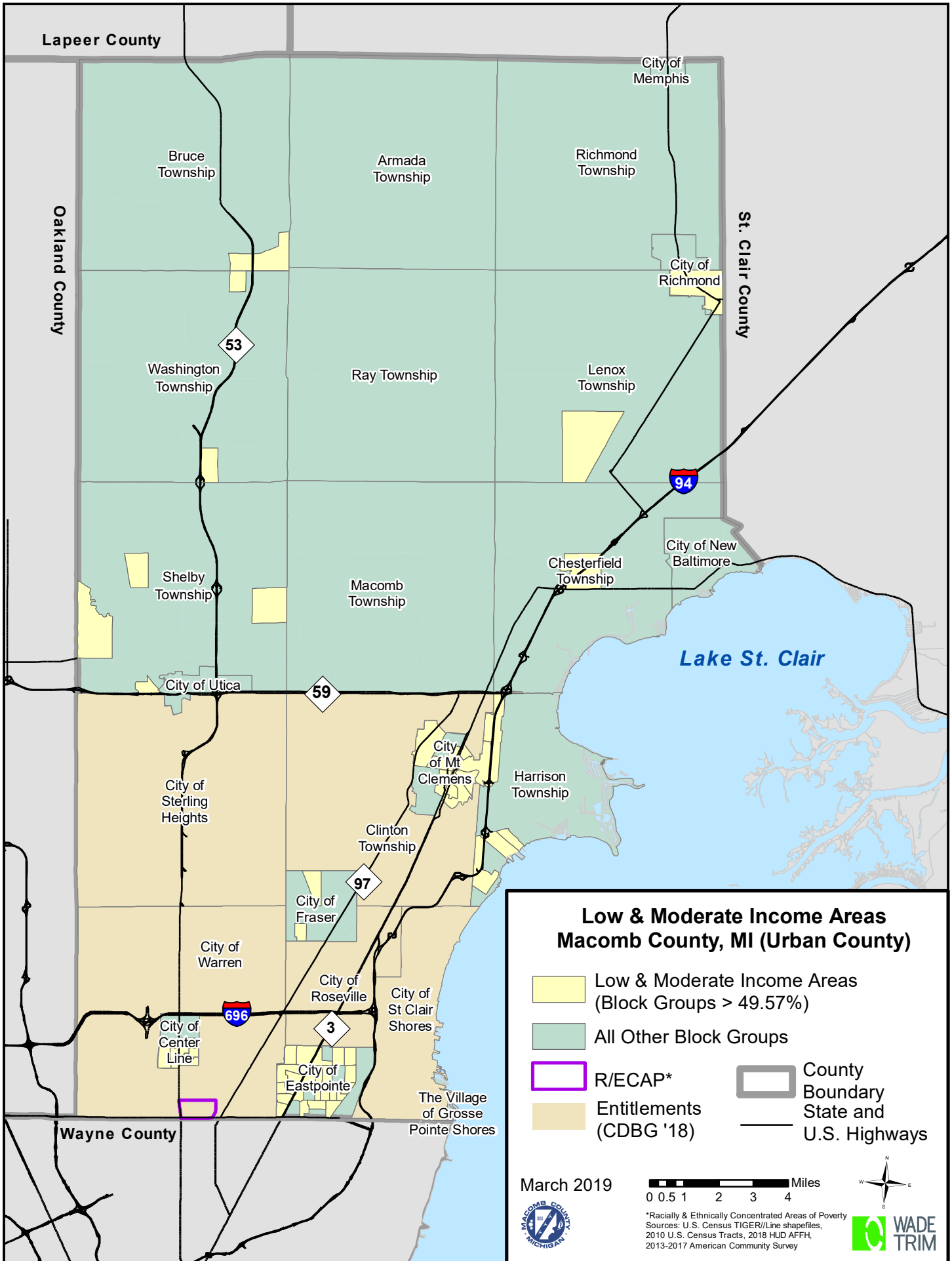
	Less than 15%		State and U.S. Highways
	16% - 25%		County Boundary
	26% - 35%		R/ECAP*
	36% or Greater		Entitlements (CDBG '18)

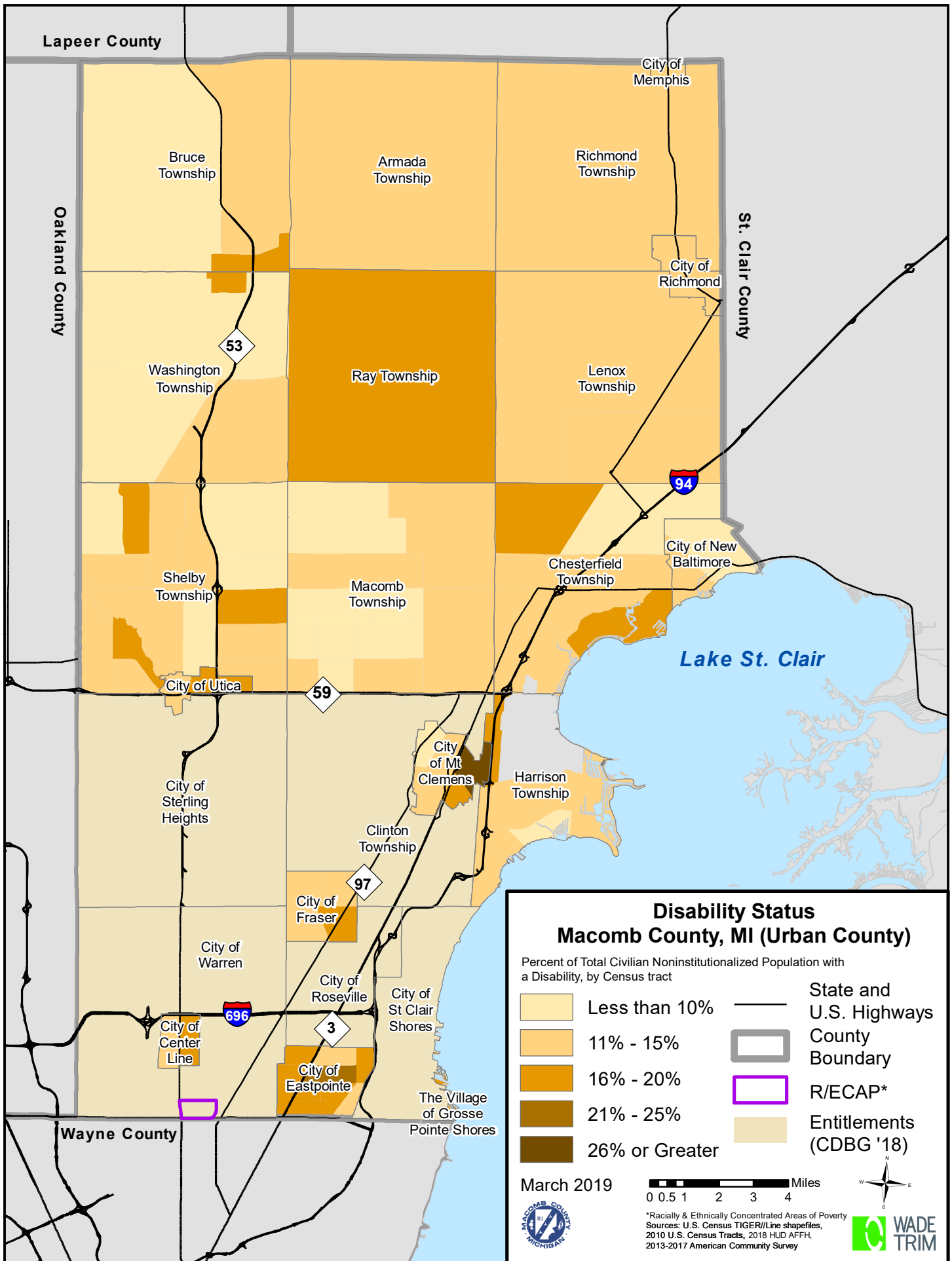
March 2019



*Racially & Ethnically Concentrated Areas of Poverty
Sources: U.S. Census TIGER/Line shapefiles, 2010 U.S. Census Tracts, 2018 HUD AFFH, 2013-2017 American Community Survey





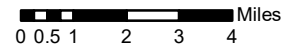


Disability Status Macomb County, MI (Urban County)

Percent of Total Civilian Noninstitutionalized Population with a Disability, by Census tract

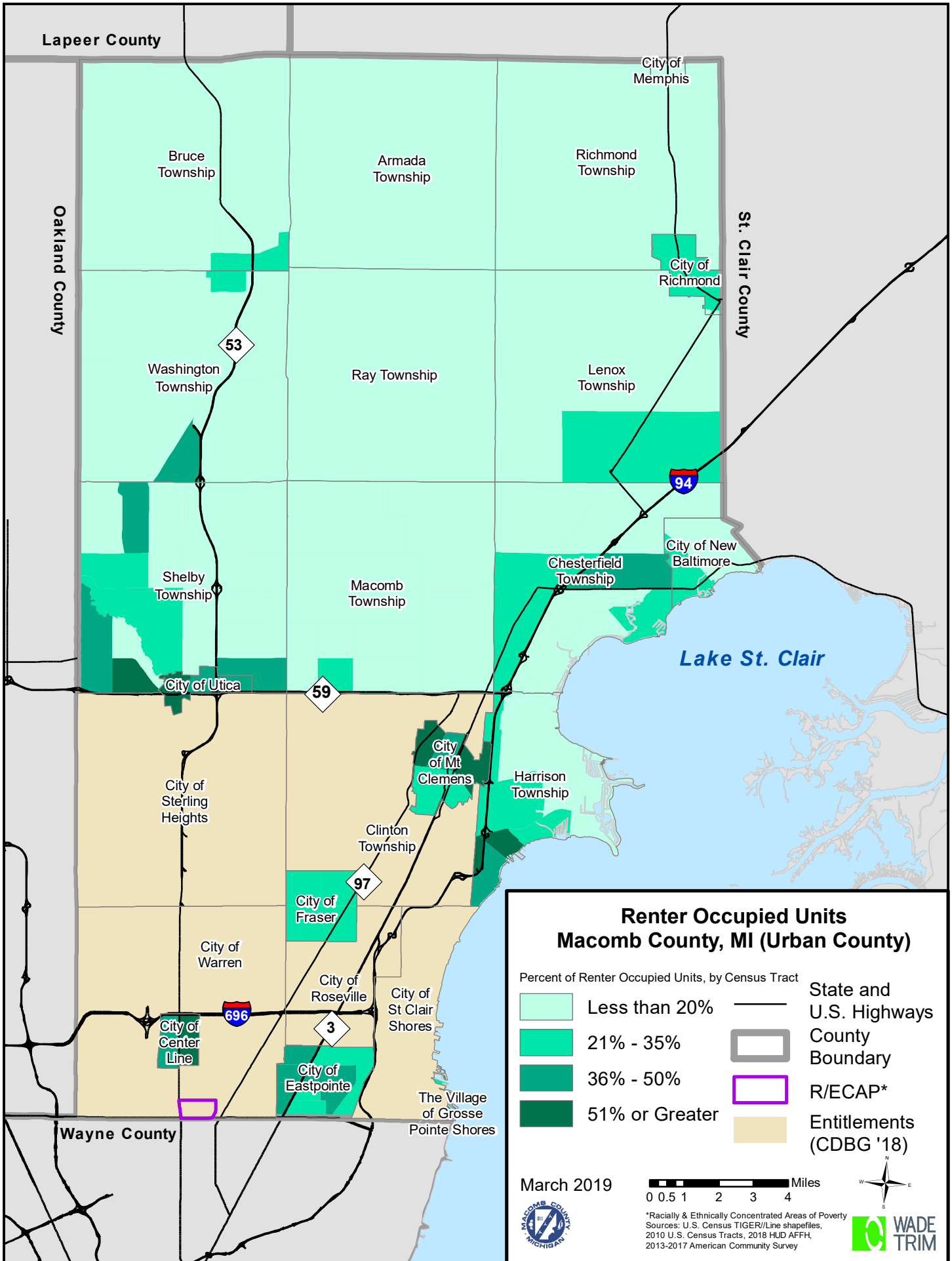
- Less than 10%
 - 11% - 15%
 - 16% - 20%
 - 21% - 25%
 - 26% or Greater
- State and U.S. Highways
 - County Boundary
 - R/ECAP*
 - Entitlements (CDBG '18)

March 2019



*Racially & Ethnically Concentrated Areas of Poverty
Sources: U.S. Census TIGER/Line shapefiles, 2010 U.S. Census Tracts, 2018 HUD AFFH, 2013-2017 American Community Survey





Renter Occupied Units Macomb County, MI (Urban County)

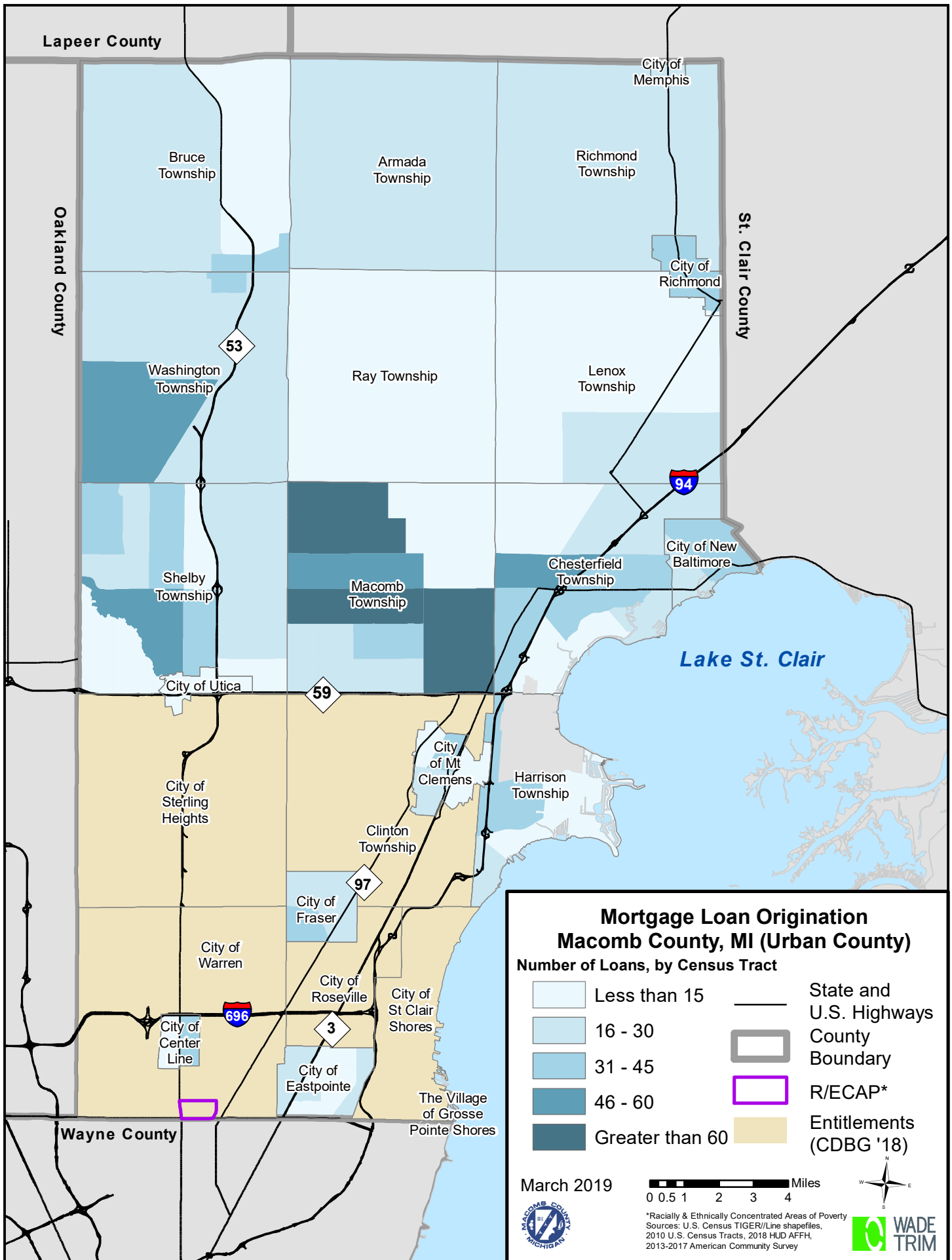
Percent of Renter Occupied Units, by Census Tract

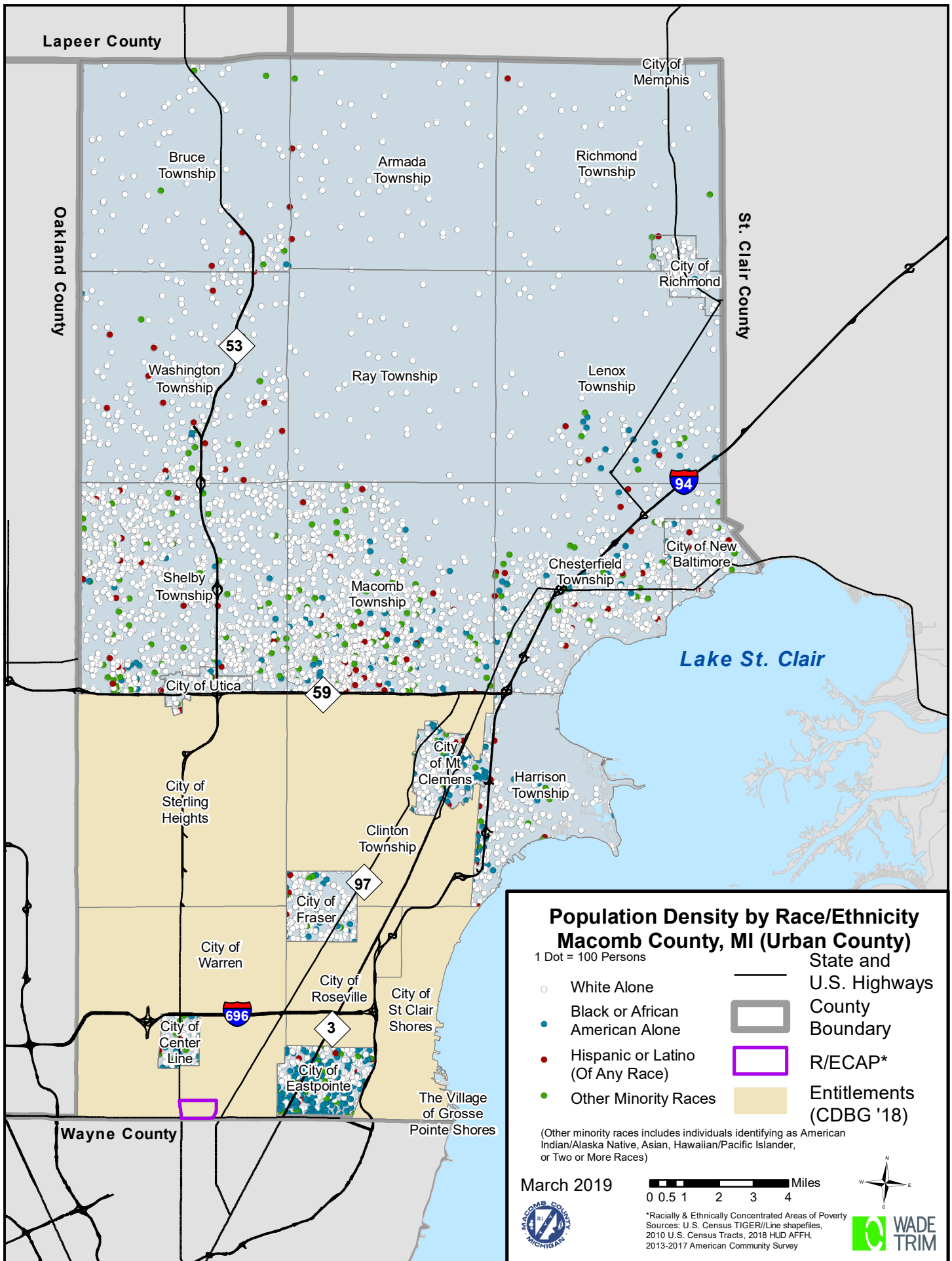
	Less than 20%		State and U.S. Highways
	21% - 35%		County Boundary
	36% - 50%		R/ECAP*
	51% or Greater		Entitlements (CDBG '18)

March 2019

0 0.5 1 2 3 4 Miles

*Racially & Ethnically Concentrated Areas of Poverty
Sources: U.S. Census TIGER/Line shapefiles, 2010 U.S. Census Tracts, 2018 HUD AFFH, 2013-2017 American Community Survey





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21885 DUNHAM RD

Ste 10

CLINTON TOWNSHIP, MI 48036

**STATE OF MICHIGAN,
COUNTY OF MACOMB**

The undersigned Cyndy Slater Cyndy Slater, being duly sworn the he/she is the principal clerk of Macomb Daily, macombdaily.com, macombdaily.com2, published in the English language for the dissemination of local or transmitted news and intelligence of a general character, which are duly qualified newspapers, and the annexed hereto is a copy of certain order, notice, publication or advertisement of:

MACOMB COMMUNITY ACTION

Published in the following edition(s):

Macomb Daily	01/11/19
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macombdaily.com2	01/11/19

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back

JINA M CROWN
Notary Public - Michigan
Lapeer County
My Commission Expires Mar 20, 2021
Acting in the County of Oakland

Sworn to the subscribed before me this 11th January 2019

Jina M Crown

**Notary Public, State of Michigan
Acting in Oakland County**

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**NOTICE OF PUBLIC MEETING
ANALYSIS OF IMPEDIMENTS TO FAIR
HOUSING CHOICE**

Communities which receive federal funds are required by the U.S. Department of Housing and Urban Development (HUD) to complete an Analysis of Impediments to Fair Housing Choice (AI) every five years. HUD defines an impediment to fair housing choice as any actions, omissions, or decisions that restrict, or have the effect of restricting, the availability of housing choices, based on race, color, religion, sex, disability, familial status, or national origin.

Macomb County will hold public meetings to inform Macomb County residents about the Analysis of Impediments to Fair Housing Choice (AI), as well as provide an opportunity for all to participate in the AI planning process.

Date/Time	Location	Target Audience
January 28, 2019 at 10:30 am	Macomb County Family Resource Center, 196 N. Rose, Mount Clemens, MI 48043 – Training Room (Suite 22/23)	Housing Providers
February 13, 2019 at 5:30 pm	Macomb County Family Resource Center, 196 N. Rose, Mount Clemens, MI 48043 – Art Room (Suite 24)	General Public

The AI will cover the jurisdiction of the Macomb Urban County Community Development Block Grant program which includes all Macomb County communities with the exception of the cities of Sterling Heights, Roseville, Warren and St. Clair Shores and the Charter Township of Clinton.

Persons living and working in Macomb County are encouraged to attend and provide input. Anyone unable to attend these meetings but wishing to make their views known may do so by submitting written comments to:

Macomb Community Action – Community Development
Attn: Stephanie Burgess, Program Manager
21885 Dunham Road, Suite 10
Clinton Township, MI 48036

Comments may also be submitted via email to stephanie.burgess@macombgov.org or telephone (586) 466-6256.

Reasonable accommodations will be made for individuals with disabilities or persons with Limited English Proficiency requiring auxiliary aids or services. Persons needing a special accommodation to participate should contact Macomb Community Action – Community Development at (586) 466-6256 or write to Stephanie Burgess, Program Manager at the address provided above. Requests must be received at least (5) working days prior to the meeting date.

**Mark A. Hackel
Macomb County Executive**

**Albert L. Lorenzo
Deputy County Executive**

Published January 11, 2019



ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE HOUSING PROVIDERS WORKSHOP MEETING AGENDA

Monday, January 28, 2019
10:30am – 11:45am
Macomb County Family Resource Center
Training Room (Suite 22/23)
196 N. Rose
Mount Clemens, MI 48043

10:30am – 10:40am	Welcome / Introductions Jason Smith, Stephanie Burgess and Jazmyn Thomas
10:40am – 10:50am	What is Fair Housing?
10:50am – 11:00am	Fair Housing Education and Quiz
11:00am – 11:30am	Group Discussion of Impediments to Fair Housing in Macomb County <ul style="list-style-type: none">• Programs Available/Government Assisted Housing• Real Estate Practices• Landlord Behaviors• Property Insurance• Banking and Lending Practices• Housing Availability (Rental and Owner)• Zoning Laws, Building Codes, and Tax Laws• ADA Accessibility• Neighborhood Environment
11:30am – 11:45am	Final Comments/Questions
11:45am	Meeting Adjourned



Analysis of Impediments to Fair Housing Choice - Housing Providers Meeting
January 28, 2019 | 10:30am
Macomb County Family Resource Center
Training Room (Suite 22/23)
196 N. Rose
Mount Clemens, MI 48043

SIGN-IN SHEET
(Please Print Clearly)

NAME NEIGHBORHOOD/GROUP/AGENCY ADDRESS EMAIL/PHONE

Troy Jeschke City of Richmond 36725 Division. jeschke@cityofrichmond.net

Dominica Tokarski Turning Point 158 South Main dtokarski@turningpointmacomb.org

Melissa Clemen Turning Point 158 South Main mclenden@turningpointmacomb.org

Julie Hintz Macomb Com. Action 21885 Durham Rd, Ste 10 julie.hintz@macombgov.org

Stephanie Burgess Macomb Com Action 196 N. Rose Mount Clemens stephanie.burgess@macombgov.org

Jazmyn Thomas MCA 196 N. Rose jazmyn.thomas@macombgov.org

MACOMB COUNTY COMMUNITY ACTION

Analysis of Impediments
to Fair Housing Choice (AI)

HOUSING PROVIDERS WORKSHOP

January 28, 2019



YOUR ROLE TODAY

Add experience and perspective to data analysis
provide local perspective of fair housing issues and
contributing factors raised.

WHAT DOES THIS SYMBOL MEAN?



**EQUAL HOUSING
OPPORTUNITY**

This is the fair housing symbol; landlords, banks, real estate agents and others use it to show that they will not discriminate against your family when you are looking for a home.

WHAT IS FAIR HOUSING?

It means you and your family have equal opportunity to choose where to live (depending only on whether you are able to pay the rent or mortgage) without being discriminated against or treated differently than other people

HOUSING DISCRIMINATION IS ILLEGAL

The Federal Fair Housing Act (Title VII of the Civil Rights Act of 1968) prohibits:

- Refusing to rent
- Refusing to sell
- Refusing to make available or negotiate
- Refusing to make a mortgage loan, or provide insurance, etc.
- Impose different terms or conditions
- Threaten, coerce, or intimidate (includes sexual harassment)
- Make discriminatory advertising

BASED ON:

- Race
- Color
- National Origin
- Religion
- Gender
- Disability
- Presence of children under the age of 18 or a pregnant woman in the family

ADDITIONAL PROTECTION IF YOU HAVE A DISABILITY:

If you have a physical or mental disability or are regarding as having such:

- Landlord may not refuse to make reasonable accommodations for you to use the property on an equal basis
- Landlord may not refuse to let you make reasonable modifications to your dwelling or common use areas, at your expense
- Accessibility requirements for buildings with 4 or more units first occupied after March 13, 1991

BENEFITS:

- ✓ Fair Housing:

It's Not An Option, It's The Law

- ✓ Promotes integrated communities,
not segregation

- ✓ Prevents prejudice

EXAMPLES OF DISCRIMINATORY HOUSING PRACTICES:

The following practices are prohibited by law:

- Failing to accept or consider a bona fide offer
- Refusing to sell to or rent , or negotiate for the sale or rental of a dwelling
- Imposing different sale prices, or rental charges
- Using different qualifications, criteria and standards
- Providing different information, or promotional activity
- Evicting any tenant on a protected basis or the characteristics of a tenants guests
- Steering
- Assigning a person to a particular section of a community, neighborhood, development or floor of a building
- Restricting housing choices
- Using codes or devices to segregate or reject persons
- Refusing to show listings in certain areas

SUSPECT DISCRIMINATION IF:

- The sign says “Vacancy”, but the manager says “We just rented it”
- “You really wouldn’t have enough space with so many children”
- “I don’t think your wheelchair would fit through our doors”
- Only tenants of certain race get eviction notices, etc.

WHAT COUNTS IS:

- Your ability to pay (income)
- Your capital (property, savings, etc.)
- Your credit history (dependability)

DEFINITIONS

Fair housing issue. A condition in a program participant's geographic area of analysis that restricts fair housing choice or access to opportunity, and includes such conditions as ongoing local or regional segregation or lack of integration, racially or ethnically concentrated areas of poverty, significant disparities in access to opportunity, disproportionate housing needs, and evidence of discrimination or violations of civil rights laws or regulations related to housing. 24 C.F.R. § 5.152

Fair housing contributing factor. A factor that creates, contributes to, or increases the severity of one or more fair housing issues. 24 C.F.R. § 5.152

FAIR HOUSING QUIZ



QUESTIONS TO CONSIDER

- Current acts of discrimination?
- Past acts of discrimination?
- Employment opportunities?
- Community characteristics?
- Access to public transit?
- Private or public disinvestment?
- Condition and availability of infrastructure?
- Affordability?
- Proximity to public institutions
- Historic development patterns?

What factors may lead to concentrations of certain types of households in Macomb County? Of barriers to housing choice?



DISCUSSION





FAIR HOUSING



HOW MUCH DO YOU KNOW?

True or False?

1. Under federal law, it is legal for an apartment building owner to assign families with younger children to one particular building?
2. An apartment building owner has the right to reject an applicant because of poor housekeeping habits.
3. Not allowing the construction of a wheelchair ramp on the apartment building owner's property is permissible, even if the tenant agrees to remove it at his/her own expense upon leaving.
4. Under federal law, indicating a preference based on religion in advertising an available apartment is perfectly legal.
5. An apartment building owner may legally reject an applicant with a history of mental illness, though he/she is not a danger to others.
6. A rental application may be rejected by the landlord because of the applicant's religion.
7. When using a real estate agent, a family may sell their house only to a white buyer.
8. A real estate agent is allowed to limit a home search to certain neighborhoods based on the client's race/ethnicity.
9. A loan officer may turn down a Black applicant because of the applicant's lack of steady job and income.
10. It is legal for a loan officer to require higher down payments from Hispanic families in order to get a mortgage.

Answer Key:

1. False 2. True 3. False 4. False 5. False
6. False 7. False 8. False 9. True 10. False

FAIR HOUSING WORKSHOP 1/28/19

- * - AFFORDABLE HOUSING - CERTAIN AREAS - RENTALS
 - LOWER INCOME LIMITS AREA
 - NEW HOMES (HIGH MEDIUM COST)
 - AS ECONOMY HAS IMPROVED RENTALS HAVE INCREASED
- * - SINGLE MOTHERS OF COLOR / "TOO MANY CHILDREN"
- ACCESSIBILITY IN OLDER BUILDINGS / UNITS
- DOMESTIC VIOLENCE EDUCATION FOR LANDLORDS
 - VICTIM IS EVICTED DUE TO ABUSER
 - CREDIT ISSUE / HISTORY OF RECENT EVICTION
- TRANSPORTATION BARRIERS / JOB CENTERS CONNECT TO AFF. HOUSING
- JOB HISTORY IS CHOPPY
- LANDLORD EDUCATION ON HOUSING VOUCHERS
 - LACK OF INFO?
 - PERCEPTION?
 - RED TAPE?

**Analysis of Impediments to Fair Housing Choice
Public Meeting – Housing Providers**
Macomb County Family Resource Center
196 N. Rose, Mount Clemens, MI 48043
January 28, 2019
10:30 AM



**Summary:
Public Meeting**

Macomb County is in the process of updating the Analysis of Impediments to Fair Housing Choice to develop an action plan to mitigate impediments to fair housing choice within the Macomb County.

On January 28, 2019 the County conducted a public meeting with Housing Service Providers which was located in the Macomb County Family Resource Center Training Room.

In an effort to provide an environment that would allow for all attendees to participate, an open discussion where citizens were asked to discuss issues and concerns publicly was conducted.

Open Discussion

During the open discussion citizens were asked to speak their mind on fair housing issues and concerns affecting their respective community. Through this process many Macomb County residents and service providers spoke out. A number of issues were brought to the Project Team's attention. Listed below are issues that were discussed during the open discussion:

Fair Housing Needs and Concerns

- Transportation Barriers
 - Job centers should connect to affordable housing
- Education for Landlords
 - Domestic Violence
 - Section 8 Housing Vouchers
 - Red Tape
- Accessibility in older buildings/units
- Affordable Housing
 - Cost of new homes too high
 - Rentals have increased as economy increased
 - Discrimination against single mothers and people of color

For questions regarding the Analysis of Impediments to Fair Housing and other Fair Housing concerns, please contact Stephanie Burgess, at 586.469.6451 or stephanie.burgess@macombgov.org.

Macomb County Community Action
Stephanie Burgess, Program Manager
21885 Dunham Rd, Suite 10
Mount Clemens, Michigan 48036
More information can be seen at: <https://mca.macombgov.org/MCA-Home>

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MACOMB COMMUNITY ACTION
21885 DUNHAM RD

Ste 10

CLINTON TOWNSHIP, MI 48036

**STATE OF MICHIGAN,
COUNTY OF MACOMB**

The undersigned Cyndy Slater Cyndy Slater, being duly sworn the he/she is the principal clerk of Macomb Daily, macombdaily.com, macombdaily.com2, published in the English language for the dissemination of local or transmitted news and intelligence of a general character, which are duly qualified newspapers, and the annexed hereto is a copy of certain order, notice, publication or advertisement of:

MACOMB COMMUNITY ACTION

Published in the following edition(s):

Macomb Daily	01/11/19
macombdaily.com	01/11/19
macombdaily.com2	01/11/19

See
back

JINA M CROWN
Notary Public - Michigan
Lapeer County
My Commission Expires Mar 20, 2021
Acting in the County of Oakland

Sworn to the subscribed before me this 11th January 2019

Jina M Crown

**Notary Public, State of Michigan
Acting in Oakland County**

Advertisement Information

Client Id: 989285 Ad Id: 1720029 PO: Total: \$832.90

**NOTICE OF PUBLIC MEETING
ANALYSIS OF IMPEDIMENTS TO FAIR
HOUSING CHOICE**

Communities which receive federal funds are required by the U.S. Department of Housing and Urban Development (HUD) to complete an Analysis of Impediments to Fair Housing Choice (AI) every five years. HUD defines an impediment to fair housing choice as any actions, omissions, or decisions that restrict, or have the effect of restricting, the availability of housing choices, based on race, color, religion, sex, disability, familial status, or national origin.

Macomb County will hold public meetings to inform Macomb County residents about the Analysis of Impediments to Fair Housing Choice (AI), as well as provide an opportunity for all to participate in the AI planning process.

Date/Time	Location	Target Audience
January 28, 2019 at 10:30 am	Macomb County Family Resource Center, 196 N. Rose, Mount Clemens, MI 48043 – Training Room (Suite 22/23)	Housing Providers
February 13, 2019 at 5:30 pm	Macomb County Family Resource Center, 196 N. Rose, Mount Clemens, MI 48043 – Art Room (Suite 24)	General Public

The AI will cover the jurisdiction of the Macomb Urban County Community Development Block Grant program which includes all Macomb County communities with the exception of the cities of Sterling Heights, Roseville, Warren and St. Clair Shores and the Charter Township of Clinton.

Persons living and working in Macomb County are encouraged to attend and provide input. Anyone unable to attend these meetings but wishing to make their views known may do so by submitting written comments to:

Macomb Community Action – Community Development
Attn: Stephanie Burgess, Program Manager
21885 Dunham Road, Suite 10
Clinton Township, MI 48036

Comments may also be submitted via email to stephanie.burgess@macombgov.org or telephone (586) 466-6256.

Reasonable accommodations will be made for individuals with disabilities or persons with Limited English Proficiency requiring auxiliary aids or services. Persons needing a special accommodation to participate should contact Macomb Community Action – Community Development at (586) 466-6256 or write to Stephanie Burgess, Program Manager at the address provided above. Requests must be received at least (5) working days prior to the meeting date.

**Mark A. Hackel
Macomb County Executive**

**Albert L. Lorenzo
Deputy County Executive**

Published January 11, 2019



Analysis of Impediments to Fair Housing Choice - Public Outreach Meeting
February 13, 2019 | 5:30pm
Macomb County Family Resource Center
Art Room (Suite 24)
196 N. Rose
Mount Clemens, MI 48043

SIGN-IN SHEET

(Please Print Clearly)

NAME

NEIGHBORHOOD/GROUP/AGENCY

ADDRESS

EMAIL/PHONE

Deoise Hendricks 43456 Goldsind 586 298 4678

Gerry Cutler 31719 Glade Warren 586 415 244

The Federal Fair Housing Act (FHA)

prohibits discrimination in housing on the basis of the following protected classes:

- Race
- Color
- Religion
- National origin
- Sex* (including sexual harassment)
- Familial status**
- Disability

* The FHA does not specifically protect against discrimination based on sexual orientation and gender identity. However,

a lesbian, gay, bisexual, or transgender (LGBT) person's experience with sexual orientation or gender identity housing discrimination may still be covered under the FHA.

** Familial status protects children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under 18.

The Macomb County Fair Housing Ordinance provides additional protections.

What Housing is Covered?

The Fair Housing Act covers most housing, including single-family homes, apartments, townhouses, and condominiums. Privately owned and subsidized housing are both covered.

What is Prohibited?

No one may take any of the following actions based on race, color, religion, national origin, sex, familial status, or disability:

In the sale and rental of housing:

- Refuse to rent or sell housing;
- Refuse to negotiate for housing;
- Make housing unavailable;
- Deny a dwelling;
- Set different terms, conditions or

privileges for sale or rental of a dwelling;

- Provide different housing services or facilities;
- Falsely deny that housing is available for inspection, sale, or rental;
- For profit, persuade owners to sell or

- Deny anyone access to or membership in a facility or service (such as a multiple listing service) related to the sale or rental of

housing.

In mortgage lending:

- Refuse to make a mortgage loan;
- Refuse to provide information regarding loans;
- Impose different terms or conditions on a loan, such as different interest rates, points, or fees;
- Discriminate in appraising property; or
- Refuse to purchase a loan or set different terms or conditions for purchasing a loan.

It is illegal for Anyone to:

- Threaten, coerce, intimidate or interfere with anyone exercising a fair housing right or assisting others who exercise that right; or
- Advertise or make any statement that indicates a limitation or preference based on race, color, religion, national origin, sex, familial status, or disability.





MACOMB COUNTY FAIR HOUSING SURVEY

1. What race/ethnicity do you identify with?

- American Indian or Alaska Native
- Asian
- Black or African American
- Hispanic or Latino
- Native Hawaiian and Pacific Islander
- White, Not Hispanic or Latino
- Two or More Races
- Other Race

2. What is your age?

- Less than 21 years old
- 21 to 35 years
- 36 to 55 years
- 56 years to 74 year
- 75 years and over

3. What is your gender?

- Male
- Female

4. What is your annual household income?

- \$0 - \$25,000
- \$25,001 - \$35,000
- \$35,001 - \$50,000
- \$50,001 - \$70,000
- \$70,001+

5. Are you aware of the "basic" Fair Housing requirements (which prohibit discrimination in buying, selling, renting, or lending based on race, color, religion, sex, nationality)?

- Yes No

6. Do you believe housing discrimination is an issue in Macomb County, Michigan?

- Yes
- No
- If yes, why?

7. Have you ever experienced housing discrimination?

- Yes, I have (Please state what happened in the space provided below)
- I think I may have
- No, I have not
- Yes, I know someone who was
- I think I may know someone who has
- No, I don't know anyone who has
- I do not know

If "Yes, I have", please explain:

8. If you believe or think that someone you know encountered housing discrimination, please indicate any of the following that apply.

- Housing provider refuses to rent or deal with a person
- Housing provider falsely denies that housing was available
- Housing provider refuses to make reasonable accommodations for a tenant with one or more disabilities
- Housing provider uses discriminatory advertising
- Real Estate Agent refuses to sell or deal with a person
- Real Estate Agent directs people to certain neighborhoods
- Housing mortgage lender discriminates by denying mortgage
- Housing lender directs people to certain neighborhoods
- Different terms and conditions are provided for renting based on race of the tenant.
- Other (please specify)

9. On what basis do you believe you or someone you know were discriminated against? (select all that apply)

- Race
- Color
- Religion
- Disability
- National Origin
- Other (please specify)
- Gender
- Family Status (single, divorced, children, expecting a child)
- Not Applicable

10. If you believe you have been subjected to discrimination, have you reported the incident?

- Yes
- No
- Not Applicable

If No, why not?

- Do not know where to report
- Afraid of retaliation
- Too much trouble
- Do not believe it make a difference
- Not Applicable

11. How well informed would you say you are about housing discrimination?

- Very informed
- Somewhat informed
- A little informed
- Not informed at all
- Other (please specify)

12. What would you do if you encountered housing discrimination?

- Do nothing and seek other housing options
- Tell the person that you believe they are discriminating
- Report it
- Would not know what to do
- Other (please specify)

Thank You For Your Assistance!

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MACOMB COUNTY FAIR HOUSING SURVEY

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- | | |
|---|--|
| <input type="checkbox"/> Race | <input type="checkbox"/> Gender |
| <input type="checkbox"/> Color | <input type="checkbox"/> Family Status (single, divorced, children, expecting a child) |
| <input type="checkbox"/> Religion | <input type="checkbox"/> Not Applicable |
| <input type="checkbox"/> Disability | |
| <input type="checkbox"/> National Origin | |
| <input type="checkbox"/> Other (please specify) | <div style="border: 1px solid black; width: 320px; height: 20px;"></div> |

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|--|--|
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| <input type="checkbox"/> Religion | <input type="checkbox"/> Not Applicable |
| <input type="checkbox"/> Disability | |
| <input type="checkbox"/> National Origin | |

Other (please specify)

Age (Young)

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