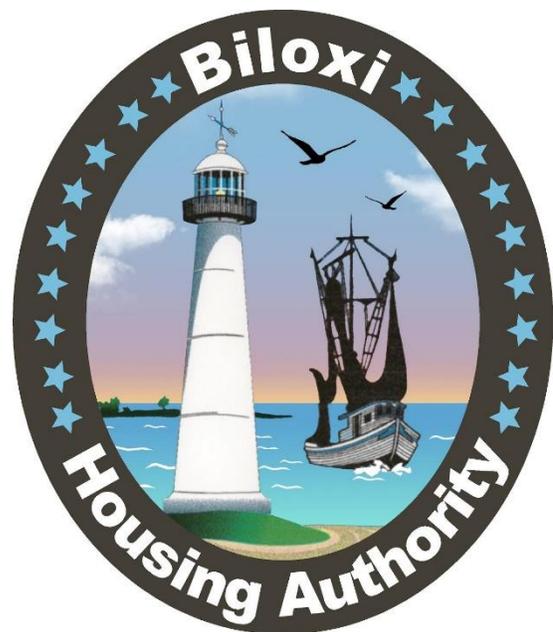


# CITY OF BILOXI AND BILOXI HOUSING AUTHORITY

2019 ANALYSIS OF IMPEDIMENTS TO FAIR  
HOUSING CHOICE





# 2019 CITY OF BILOXI AND BILOXI HOUSING AUTHORITY

## ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE:

Prepared for:  
City of Biloxi  
and  
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### **Final Report**

Adopted by the City of Biloxi 11/6/19 by Resolution No. 710-19  
Adopted by the Biloxi Housing Authority 11/13/19 by Resolution No. 1119-028

# Has Your Right to Fair Housing Been Violated?

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

## The United States Department of Housing and Urban Development

### **Address:**

Office of Fair Housing and Equal Opportunity  
Department of Housing and Urban Development  
451 Seventh Street SW, Room 5204  
Washington, DC 20410-2000

**Telephone:** (202) 708-1112

**Toll Free:** (800) 669-9777

**Web Site:** <http://www.HUD.gov/>

## The Mississippi Center for Justice

### **Address (Jackson Office):**

5 Old River Place

Suite 203 (39202)

P.O. Box 1023

Jackson, MS 39215-1023

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## SECTION I. EXECUTIVE SUMMARY

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### OVERVIEW

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

1. The Fair Housing Act,
2. The Housing Amendments Act, and
3. The Americans with Disabilities Act.

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

### ASSESSING FAIR HOUSING

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

In 1994, HUD published a rule consolidating plans for housing and community development programs into a single planning process. This action grouped the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grants (ESG)<sup>1</sup>, and Housing Opportunities for Persons with AIDS (HOPWA) programs into the Consolidated Plan for Housing and Community Development, which then created a single application cycle. As a part of the consolidated planning process, entitlement communities that receive such funds from HUD are required to submit to HUD certification that they are affirmatively furthering fair housing (AFFH), which is part of the process of developing the Analysis of Impediments. This was described in the Analysis of Impediments to Fair Housing Choice and a Fair Housing Planning Guide offering methods to conduct such a study was released in March of 1993.

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

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<sup>1</sup>The Emergency Shelter Grants program was renamed the Emergency Solutions Grants program in 2011.

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

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

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

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

## **OVERVIEW OF FINDINGS**

As a result of detailed demographic, economic, and housing analysis, along with input provided during a range of activities designed to foster public involvement and feedback, the City of Biloxi and Biloxi Housing Authority have identified a series of fair housing issues/impediments, and other contributing factors that contribute to the creation or persistence of those issues.

A brief set of definitions of select contributing factors and fair housing issues are included along with a set of commonly used acronyms. A more complete detailed analysis of each of these terms is included throughout the document.

**Areas of Opportunity** are physical places, areas within communities that provide things one needs to thrive, including quality employment, well performing schools, affordable housing, efficient public transportation, safe streets, essential services, adequate parks, and full-service grocery stores.

**Low Poverty** is a measure of the degree of poverty in a neighborhood, at the Census Tract level.

**School Proficiency** uses School-level data on the performance of 4<sup>th</sup> grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing schools.

**Labor Market Engagement** provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood

**Disparities in Access to Opportunity** inspects whether a select group, or certain groups, have lower or higher levels of access to these community assets.

**Disproportionate Housing Needs** explore whether a select group, or certain groups, have a higher level of housing problems than the jurisdiction as a whole. Housing Problems include overcrowding, incomplete plumbing or kitchen facilities, and cost-burden.

**ACS** – American Community Survey

**AFFH** – Affirmatively Furthering Fair Housing

**AFH** – Assessment of Fair Housing

**AI** – Analysis of Impediments

**CET** – Citizen Engagement Toolbox

**HMDA** – Home Mortgage Disclosure Act

**HUD** – Department of Housing and Urban Development

**MS NAHRO** – Mississippi National Association of Housing and Redevelopment Officials

**RAD** – Rental Assistance Demonstration

**R/ECAP** – Racially or Ethnically Concentrated Areas of Poverty

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

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

<b>Contributing Factors</b>	<b>Priority</b>	<b>Justification</b>
Discriminatory patterns in lending	Medium	Minority households tend to have higher rates of mortgage denials than white households, as seen in 2008-2016 HMDA data, with the average denial rate for black households at 27.9% versus 13.4% for white households in Biloxi.
Failure to make reasonable accommodation	Low	HUD Fair Housing Complaint data suggests that failure to make reasonable accommodation was the most cited issue for complaints in Biloxi.
Lack of access to housing for homeless and released from incarceration	Medium	Public input and the homeless and vulnerable population analysis revealed that homeless, persons recently released from incarceration, and transition-age foster youth have limited access to housing options throughout the State.
Lack of access to independence for persons with disabilities	Medium	Public input, the Disability and Access workgroup, and the Disability and Access Analysis revealed that households with disabilities have limited access to options that increase their independence.
Lack of opportunities for persons to obtain housing in higher opportunity areas	Low	Access to higher opportunity areas is limited for many households due to income, transportation, and a variety of factors. Black households in Biloxi have markedly lower access to low poverty areas and labor market engagement.
Moderate levels of segregation	Low	The dissimilarity index shows a moderate to high level of segregation for minority households, including American Indian households in Biloxi. However, these households represent less than one percent of the population. No other racial and ethnic minorities have a moderate or high-level of segregation.
Moderate to high concentrations of poverty	Medium	Concentrations of poverty, as demonstrated by R/ECAP in Biloxi, continue to be a contributing factor in accessing fair housing.
Lack of resources	High	Lack of resources continues to be a high rated contributing factor, as noted by Stakeholder Consultation meetings and public input.
Insufficient affordable housing in a range of unit sizes	Medium	The prevalence of cost burden, especially for lower income households, demonstrates the continued need for affordable housing options in a range of unit sizes. Some 38.0% of households in Biloxi experience cost burden or severe cost burden.
Insufficient accessible affordable housing	Medium	The Disability and Access workgroup and Disability and Access analysis, coupled with a high disability rate particularly for the elderly population, demonstrated a lack of accessible affordable housing to meet current and future demand.
Lack of fair housing organization	Low	Fair housing survey results and public input indicated a lack of fair housing organization.
Insufficient fair housing education	Medium	Fair housing survey results and public input indicated a continued need for fair housing education.
Insufficient understanding of credit	Medium	Fair housing survey results and public input indicated an insufficient understanding of credit.

### **ADDITIONAL FINDINGS**

In addition to the table above, there are several significant findings or conclusions summarized here. American Indian households have a moderate level of segregation. However, these households represent a small proportion of the population. There is one R/ECAP in Biloxi currently. Black households have lower access to low poverty areas and labor market engagement. Publicly supported housing units do not tend to be located in R/ECAPs.

### **FAIR HOUSING ISSUES, CONTRIBUTING FACTORS, AND PROPOSED ACHIEVEMENTS**

The Table I.2, summarizes the fair housing issues/impediments and contributing factors. It includes

metrics and milestones and a timeframe for achievements of recommended actions.

<b>Table I.2</b> <b>Fair Housing Issues, Contributing Factors, and Recommended Actions</b>			
<b>Fair Housing Issues/ Impediments</b>	<b>Contributing Factors</b>	<b>Recommended Actions to be Taken</b>	<b>Responsible Agency</b>
Disparities in Access to Opportunity	Discriminatory patterns in lending  Discriminatory terms/conditions  Lack of access to housing for homeless and released from incarceration  Lack of access to independence for persons with disabilities  Lack of opportunities for persons to obtain housing in higher opportunity areas	Continue to consult with local transportation agencies to increase access to transit options for persons in high poverty areas, ongoing, with minimum of one formal consultation annually  Continue to coordinate local efforts to increase access for homeless households to publicly supported housing ongoing, with minimum of one formal consultation annually  Continue to receive referrals to house homeless families and provide case management for these families to remain housed ongoing, with minimum of one formal consultation annually  Continue to partner with Biloxi Public School District, State of Mississippi and others to provide computer classes/labs, afterschool programs for youth, financial literacy, nutrition workshops, and enrichment activities on an on-going basis  Work with MS NAHRO to solicit HUD to review and modify resident bedroom requirements of RAD program to better utilize housing resources for homeless so that unoccupied multi-bedroom units can accommodate homeless families	Biloxi Housing Authority  City of Biloxi
R/ECAPs	Moderate to high levels of segregation  Moderate to high concentrations of poverty	Change language to be more specific about family and disabled definition in zoning and Comprehensive Plan. Identify institutional barriers to affordable housing options, such as density maximums and lot size requirements. Review the use and definition of the term "family" in the City's codes and ordinances. Make appropriate amendments each year	City of Biloxi
Disproportionate Housing Needs	Insufficient affordable housing in a range of unit sizes  Discriminatory patterns in lending	Continue the use of Housing Choice vouchers and encourage the development of diverse affordable housing throughout the city on an ongoing basis	Biloxi Housing Authority

	Lack of Resources		
Publicly Supported Housing	<p>Insufficient affordable housing in a range of unit sizes</p> <p>Insufficient accessible affordable housing</p> <p>Lack of Resources</p>	Research and seek out additional funding opportunities for publicly supported housing options on an ongoing basis	<p>Biloxi Housing Authority</p> <p>City of Biloxi</p>
Disability and Access	Insufficient accessible affordable housing	Continue to increase the availability of publicly supported housing accessible units through the encouragement of accessible units in all new and renovated housing developments on an ongoing basis	<p>Biloxi Housing Authority</p> <p>City of Biloxi</p>
Fair Housing Enforcement and Outreach	<p>Lack of fair housing structure</p> <p>Insufficient fair housing education</p> <p>Insufficient understanding of credit</p>	<p>Continue to promote fair housing education through partnerships with outside agencies on an ongoing basis</p> <p>Continue to promote outreach and education related to financial literacy for publicly supported housing residents on an ongoing basis</p> <p>Encourage the Biloxi Public School District to conduct financial literacy for senior high school students on at least an annual basis</p>	<p>Biloxi Housing Authority</p> <p>City of Biloxi</p>

## SECTION II. COMMUNITY PARTICIPATION PROCESS

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The following section describes the community participation process undertaken for the 2019 Biloxi Analysis of Impediments to Fair Housing Choice.

### A. OVERVIEW

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The outreach process included the 2018 Fair Housing Survey, Fair Housing Forums, Disability and Access Workgroups, and a public review meeting.

The Fair Housing Survey was distributed as an internet outreach survey, as well as being made available as a printed version. As of the date of this document, 295 responses have been received.

A series of public input meetings was held for each participating jurisdiction. A set of transcripts from Biloxi's meetings are included in the Appendix.

The Draft Final Report AI was made available to the public on April 22, 2019 and a 45-day public input period was initiated.

A public hearing was held during the public review period in order to gather feedback and input on the draft Analysis of Impediment. After the close of the public review period and review and consideration of comments received, the report was finalized and made available to the public at the end of June 2019.

### B. FAIR HOUSING SURVEY

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The purpose of the survey, a relatively qualitative component of the AI, was to gather insight into knowledge, experiences, opinions, and feelings of stakeholders and interested citizens regarding fair housing as well as to gauge the ability of informed and interested parties to understand and affirmatively further fair housing. Many individuals and organizations were invited to participate. At the date of this document, some 295 responses were received. A complete set of survey responses can be found in **Section IV.I Fair Housing Survey Results**.

### C. FAIR HOUSING FORUMS

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A series of public input meetings was held for each participating jurisdiction. A set of transcripts from Biloxi's meetings are included in the Appendix. The Biloxi Housing Authority and City of Biloxi held a Fair Housing Forum on December 5, 2018 in Biloxi, in coordination with the City of Gulfport, Mississippi Regional Housing Authority VIII, Bay-Waveland Housing Authority, City of Pascagoula, and the City of Moss Point.

## D. DISABILITY AND ACCESS WORKGROUPS

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A series of four (4) Disability and Access Workgroups was held between October and December 2018 to gather feedback on the needs of persons with disabilities, which included discussion of improved access to housing throughout the State of Mississippi. A summary of comments is included below, and a complete set of transcripts is included in the Appendix.

- Persons with disabilities tend to congregate in urban areas in order to access public transit
- There is a lack of available accessible units, and a lack of new development of accessible units
- There is continued need for permanent supportive housing for persons with disabilities
- NIMBYism continues to be a challenge for construction or development of new units, especially group homes
- There should be a mandate that all new housing development includes a specified percentage of accessible units
- Significant need for public transportation options for persons with disabilities
- There is a need for integrated services beyond housing

## E. STAKEHOLDER MEETINGS

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A series of six (6) stakeholder meetings was held throughout the AI development process. Stakeholder Consultation meetings included the various participating jurisdictions across the state, providing an opportunity to give input and feedback and allow stakeholders to participate in the AI development process. In addition, a series of eight (8) progress review meetings was held to receive and review comments on the AI development process and increase coordination among participating agencies.

## F. PUBLIC REVIEW PERIOD

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The Draft for Public Review AI was made available on April 22, 2019 and a 45-day public input period was initiated.

A public hearing was held during the public review period in order to gather feedback and input on the draft Analysis of Impediment. This meeting was held on May 22, 2019 in coordination with the City of Gulfport. An excerpt from the transcript of the proceedings is included in the Appendix. After the close of the public review period and a review and consideration of comments received, the final report, which incorporated public input as applicable, was prepared and made available to the public at the end of June 2019.

## SECTION III. PAST GOALS AND ACTIONS

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An Analysis of Impediments to Fair Housing Choice for Biloxi was last completed in 2014. The conclusions drawn from this report are outlined in the following narrative.

### A. PAST IMPEDIMENTS AND ACTIONS

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*The conclusions of the 2014 Analysis of Impediments are included below:*

#### **Impediment 1: High cost of insurance for all types of housing**

In the aftermath of Katrina, FEMA updated/revised the flood maps, greatly expanding the amount of property in Biloxi located within floodplain areas. Flood insurance policies for properties located within the A zone require compliance with new elevation requirements, which increases the cost of new construction and requires expensive elevation improvements for existing structures. New FEMA requirements and higher insurance premium costs are compounded by recent changes in federal policy that reduce federal flood insurance subsidies. These changes impact individual homeowners, prospective homeowners, renters, owners of single- and multifamily rental units and lenders. The affordability of housing is greatly impacted thus impeding housing choice, especially for low- to moderate-income residents who can least afford the increased costs.

#### **Measures to Eliminate or Reduce Impediment:**

The City will continue to work with its federal and state elected representatives to address this issue.

**Timeframe:** Immediate and ongoing

#### **Impediment 2: Predatory Lending Practices**

##### **a. Large Down Payment/Creative Financing**

Interviews conducted during the preparation of the 1996 A.I. identified that large down payment requirements were an impediment to homeownership for low- to moderate- income households. The 2014 interagency meeting and interviews in 2003 and 2007 indicated that this impediment has been reduced with assistance available through various down payment assistance programs, including the Down Payment Assistance Program funded through the City of Biloxi/Harrison County HOME Consortium.

#### **Measures to Eliminate or Reduce Impediment:**

The City's Down Payment Assistance Program loans qualified low- to moderate-income households up to 30,000 dollars for down payments and certain closing costs to assist them in purchasing their first home in Biloxi. The loan is forgiven if residency requirements are met during the HUD-defined affordability period.

Protection from lending institutions that practice predatory lending practices of any type, including high interest rates and large down payments, may best be offered through public education and outreach programs to protect those unaware of their Fair Housing Act rights.

**Timeframe:** Through the Outreach Coordinator and Mayor's Awareness Committee, the City will work with local lenders, the Gulf Coast Realtors Association, the Mississippi Center for Justice and the Biloxi Housing Authority to host annual fair housing education outreach seminars; fair housing information also will be distributed annually as an April insert in the City's community calendar (Fair Housing Month), which is mailed to each household and business with a Biloxi water/sewer account.

b. Programs not tailored to Meet the Needs of Low- and Moderate-income Households  
Interviews with lenders and applicants for grants and loans during development of the 1996 A.I. revealed a concern that programs were not designed to meet the needs of low- to moderate-income households. Input offered during the 2014 development process indicated the high cost of flood insurance post-Katrina has priced many low- to moderate-income homebuyers out of the market.

**Measures to Eliminate or Reduce Impediment:**

To address this impediment, the City annually allocates a portion of its HOME Program funds from the Harrison County HOME Consortium to its Down Payment Assistance Program, which helps meet the need of eligible low- to moderate-income households for homebuyer closing costs and down payments. To qualify to receive this form of assistance, prospective homeowners must complete a homebuyer education program, which addresses budgeting for successful operation and maintenance of a home.

Currently, Visions of Hope, Inc., Mercy Housing and Habitat for Humanity of the Mississippi Gulf Coast offer pre- and post-homebuyers' education classes.

City officials also are working with state and federal elected representatives to address post-Katrina flood insurance changes that reduce federal flood insurance subsidies for homeowners.

**Timeframe:** Ongoing through implementation of the 2014 Fair Housing Public Information Outreach Strategy, attached as Exhibit E.

c. High Interest Rates/Adjustable Rates

According to interviews conducted during development of the 2014, 2007 and 2003 A.I., title loan companies and other types of lending institutions charge high interest rates to those who can least afford them. Additionally, agencies and individuals reported that some have adjusted rate loan programs that lure susceptible homebuyers to borrow money at low interest rates with rates escalating over time.

**Measures to Eliminate or Reduce Impediment:**

Through its previously-referenced annual fair housing education outreach seminars and annual insert in its April community calendar, the City will partner with the Mississippi Center for Justice, the Open Doors Homeless Coalition Continuum of Care and other nonprofit agencies to educate vulnerable citizens about predatory lending practices that include charging high interest and/or adjustable rates for home loans.

**Timeframe:** Ongoing through implementation of the 2014 Fair Housing Public Information Outreach Strategy.

### **Impediment 3: Inability of non-English speaking or limited-English speaking citizens to access housing-related information in their primary language**

The City acknowledged awareness of the need to enhance the ability of these citizens to access fair housing information in its 2007 A.I., and the City understands from 2014 interviews and interagency meetings that this continues to be an impediment. While the number of Vietnamese residents have decreased since 2006, the Hispanic population in Biloxi has increased.

The City posts notices regarding its CDBG and HOME funded programs in Spanish and Vietnamese, in addition to English, at City Hall, Community Development, the four Biloxi Library branches and at the Biloxi Housing Authority. The same notices also are posted on the City's website in three languages. Flyers in the three languages are distributed to the nonprofit service agencies that provide English as a Second Language classes and other support services to the non-English speaking public.

#### **Measures to Eliminate or Reduce Impediment:**

The City will continue its ongoing practice of providing HUD-funded program and Fair Housing information in English, Spanish and Vietnamese. In addition, it will include Fair Housing information in the three languages in its April Community Calendar mail out, which will be sent to every household in the City with a water/sewer account. Fair Housing posters in English, Spanish and Vietnamese will be provided to the Gulf Coast Association of Realtors and posted in City Hall and the four branches of the Biloxi Library.

It was recommended at the interagency meeting that the City distribute Fair Housing posters and public notices in English, Spanish and Vietnamese to the various neighborhood Vietnamese and Hispanic groceries located throughout the City to improve the outreach effort.

The City will continue to work with the nonprofit service agencies that provide English as a Second Language classes and other support services to the non-English speaking public to ensure that proactive measures are taken to protect the fair housing rights of its non-English speaking citizens.

**Timeframe:** Ongoing targeted workshops and annual mail out, as identified in 2014 Fair Housing Public Information Outreach Strategy.

### **Impediment 4: Lack of housing to accommodate those with HIV/AIDS**

As identified in its 2007 A.I. and confirmed through meetings and interviews during development of the 2014 Analysis, there continues to be some concern about renting to persons with HIV/AIDS.

#### **Measures to Eliminate or Reduce Impediment:**

The City, in compliance with its Five-Year Consolidated Plan, works with the South Mississippi AIDS Task Force to support efforts to establish housing for persons with HIV/AIDS and their families. The Task Force has among its goals the dissemination of information and education of the public regarding the needs of persons with HIV/AIDS, and the causes, treatment and spread of HIV/AIDS to alleviate concerns based on lack of information. The City will continue to work with and in support of the South Mississippi AIDS Task Force's outreach effort and to ensure that persons with HIV/AIDS are aware of their rights and protection offered them under the Fair Housing Law.

As proposed in the 2007 A.I., the City will publish a Fair Housing notice in the local Apartment Guide, a publication with widespread distribution, notifying apartment owners of their responsibilities to the disabled including those with HIV/AIDS. A copy of this notice also will be mailed to the owner of each apartment complex located in the City of Biloxi.

**Timeframe:** Ongoing through implementation of Fair Housing Public Information Outreach Strategy.

**Impediment 5: Lack of housing that is accessible to those with disabilities and clustering of housing units for the disabled**

According to the 2007 Analysis of Impediments, a 2004 Fair Housing Center compliance audit of apartments constructed after 1991 found that 75% were noncompliant in terms of accessibility and related requirements. Interviews and meetings in 2014 identified that noncompliance with the Americans with Disabilities Act remains high in newly constructed single-family houses as well as in multifamily apartment complexes.

Note: Clustering of housing for disabled citizens identified in the 2007 A.I. as an impediment was not identified as an impediment in 2014.

**Measures to Eliminate or Reduce Impediment:**

Construction of new housing post-Katrina and improved code enforcement have increased the number of housing units, both rental and owner-occupied, that is accessible to those with disabilities and the elderly.

Through its HOME-funded Down Payment Assistance Program, the City supports first-time homebuyers' opportunities to purchase accessible housing, which must comply with all local accessibility regulations.

Assisted housing administered by the Biloxi Housing Authority complies with Americans with Disability Act requirements to provide a minimum of 5% of the units in each development to support the special needs of disabled residents in addition to ensuring that at least 2% of its units are suitable for the hearing impaired.

Implementation of the updated Fair Housing Public Information Outreach Strategy will help reduce noncompliance with the Americans with Disabilities Act and the Fair Housing Act through educational workshops and related activities that detail federal requirements as they pertain to developers, builders, lenders and landlords.

The City also will consider amending the Biloxi Land Development Ordinance (LDO) to add cross-references to pertinent sections of the International Building Code (IBC), which details ADA requirements as they apply to new residential and commercial construction. The LDO definitions section will be amended to include HUD's definitions for "fair housing and impediments to fair housing," and other appropriate terms to affirmatively further fair housing and compliance with the Americans with Disabilities Act. A targeted workshop will be conducted to educate the Development Review Committee, City Planners and code inspectors about their responsibilities as they apply to enforcing Fair Housing Act and Americans with Disabilities Act federal regulations.

**Timeframe:** Ongoing through implementation of Fair Housing Public Information Outreach Strategy.

**Impediment 6: Inadequate public transportation to school and/or work**

Since the original 1996 Analysis of Impediments was developed, the City of Biloxi has been aware of the transportation problem that especially affects low- to moderate-income residents, the elderly and disabled. Meetings and interviews confirm this is an ongoing impediment to citizens' choices in terms of affordable, safe, and code compliant housing.

Exacerbated by post-Katrina floodplain remapping, new housing and apartment development is primarily occurring north of I-10, moving housing further away from employment centers, schools, recreational facilities, grocery stores, public service providers and public transportation routes. High gas prices further impact the impediment of inadequate public transportation to fair housing choice.

**Measures to Eliminate or Reduce Impediment:**

The City has a long history of supporting public transportation and, through Coast Transit Authority (CTA), continues to offer more routes to more riders than other Coast cities. Since 1996, the City has worked with CTA to identify problem areas and measures to improve linkages between Biloxi schools, employment centers and housing.

The City will continue to encourage CTA to establish and maintain routes to better meet the needs of those who need affordable transportation or lack mobility. Public transportation funding reductions at all government levels has inhibited CTA's ability to respond to requests for service expansion in recent years. However, the City of Biloxi applied for and was awarded an MDOT Transportation Enhancement grant in 2012 to fund two new bus shelters and a lighted, signal-activated crosswalk in a heavily trafficked area of West Biloxi along an existing CTA route.

**Timeframe:** The City will continue to support maintaining and expanding public transportation services provided by CTA as the municipal budget allows; the City also will continue to apply for grant funds to improve public transportation services. In terms of being an impediment to fair housing choice, inadequate public transportation services will be addressed to the extent feasible through implementation of the Fair Housing Public Information Outreach Strategy and as local funding allows.

**Impediment 7: Owners of rental property are reluctant to rent to women and children who are victims of domestic abuse**

Beginning in 1996 with development of the first A.I., some of those interviewed and providing information during public meetings have indicated there are owners of rental property in the City of Biloxi who are reluctant to rent to women and children who were victims of domestic abuse. During the 2014 interagency meeting, this concern was again expressed; input from the Gulf Coast Women's Center about this issue is pending.

**Measures to Eliminate or Reduce Impediment:**

Throughout the 2014 Analysis development, the general opinion expressed was that this impediment has been reduced in recent years, perhaps because of outreach efforts by the City, the Gulf Coast Women's Center and other nonprofit agencies to educate landlords and the general public that discrimination on the basis of familial status violates the Fair Housing Act and the City of Biloxi's Fair Housing policy.

However, since concern remains regarding discrimination in rental practices based on familial status, the City will continue to work with and support its nonprofit partners by providing fair housing information for distribution at the Gulf Coast Women's Shelter, the Salvation Army and homeless shelters so that victims of domestic abuse are aware of protections afforded them by the Fair Housing Act. The annual Fair Housing Act mail out each April also will help education landlords that it is unlawful to discriminate against prospective tenants based on familial status.

A new rule approved by the Mississippi Public Service Commission in August-September 2014 provides a 60-day waiver of initial utility deposits for individual certified by domestic violence shelters as victims of domestic violence. According to the Mississippi Coalition against Domestic Violence, surveys have found that up to 43% of domestic violence survivors reported financial problems. The new PSC rule will give victims some "breathing room" in paying housing utility deposits to make the decision easier to leave the abusive situation.

**Timeframe:** Ongoing as part of Fair Housing Public Information Outreach Strategy implementation.

**Impediment 8: Lack of fair housing education for landlords, residents, developers, builders, architects, lenders, realtors, the general public and governmental agencies** There continues to be a need for ongoing outreach to share information about the Fair Housing Act and to educate those working in any capacity with housing-related services about the rights of all people regardless of race, color, religion, sex, national origin, familial status or disability, of similar income levels to have available to them the same housing choices as others in the sale, rental and financing of housing.

**Measures to Eliminate or Reduce Impediment:**

In 2003, the City appointed a Fair Housing Officer with responsibility for assisting efforts to affirmatively further fair housing. In 2014, the City will reassign the responsibilities of the Fair Housing Officer to the Outreach Coordinator who works in coordination with the Mayor's Awareness Committee, who also oversees City compliance with the Americans with Disabilities Act.

By concentrating in one office the oversight of the City programs designed to protect the rights of vulnerable citizens, public education and outreach efforts will be better coordinated and more successful. The City's Outreach Coordinator also coordinates dissemination of the City's monthly community calendar, which will be used as a tool to mail Fair Housing information to all residents and businesses with a water/sewer account in the City of Biloxi.

In June 2014, the City initiated development of its 2015-2019 Five-Year Consolidated Plans and 2015 One-Year Action Plan. Based on community input provided as of early September 2014, it is evident

that actively improving local education about rights and responsibilities under the Fair Housing Act is a community priority; the administration is proposing to budget 2015 Program Year CDBG entitlement funds to support implementation of the updated Fair Housing Public Information Outreach Strategy, attached as Exhibit E.

Also, by amending the Biloxi Land Development Ordinance to include ADA and Fair Housing Act requirements as they pertain to residential and commercial construction, developers will become more aware of their responsibilities to the general public.

**Timeframe:** Ongoing with annual workshops and information mail outs, detailed in the Fair Housing Public Information Outreach Strategy.

**Impediment 9: Widespread unavailability of affordable, quality childcare and lack of transportation to access it**

The limited availability of quality, affordable childcare for working families, including single mothers, continues to be an impediment to fair housing choice in Biloxi. This problem is compounded by the high cost of housing insurance and the lack of public transportation throughout the City, but especially in North Biloxi where housing is more affordable.

**Measures to Eliminate or Reduce Impediment:**

Having sustained considerable damage during Hurricane Katrina, Moore Community House has basically recovered and again is providing affordable childcare for children of working parents in addition to its other programs.

Moore Community House currently provides daycare services to 104 children and consistently maintains a waiting list of more than 200 families in need of quality, affordable childcare services. The City will continue to support Moore Community House, in compliance with its Five-Year Consolidated Plan.

**Timeframe:** Ongoing through implementation of the Fair Housing Public Information Outreach Strategy.

**Impediments Identified in 2014 Not Previously Identified in Past AIs**

**Mississippi's lack of a state fair housing law and the absence of a state fair housing enforcement agency**

Input provided during the interagency meeting and in a subsequent interview with the Mississippi Center for Justice, identified the lack of a state level fair housing law and a state level agency to implement and enforce it, impedes fair housing choices and sends the message that fair housing is not a priority in Mississippi.

**Measures to Eliminate or Reduce Impediment:**

The City will continue to work with the Mississippi Center for Justice, Biloxi Housing Authority, Open Doors Homeless Coalition Continuum of Care and other housing-related service agencies to support passage and implementation/enforcement of a State of Mississippi Fair Housing Law to

reduce or eliminate the lack of state-level attention to fair housing issues as an impediment to fair housing choices.

**Timeframe:**

Ongoing; the City will lobby with its Mississippi legislative delegation to address this impediment, including provision of Fair Housing Act information to educate them about responsibilities and rights under the federal Fair Housing Act.

**FAIR HOUSING ACTIVITIES**

According to the City’s 2016 Consolidated Annual Performance and Evaluation Report (CAPER), the City has undertaken the following activities to address impediments to fair housing choice:

The Federal Programs staff is working with City Planning staff to amend the Land Development Ordinance to expand text and definitions relating to the Fair Housing and Americans with Disabilities Acts to improve developers' and contractors' understanding of their responsibilities. As part of its public education outreach campaign, identified in its 2014 Analysis of Impediments, the City annually proclaims April as Fair Housing Month at a regular meeting of the City Council and promotes fair housing in the April community calendar mailed to each household in the City.

During PY2016, the City also reached out to the Mississippi Center for Justice and Biloxi Housing Authority to collaborate on public education workshops to target various audiences, such as landlords, lending institutions and realtors, to improve their understanding of their responsibilities under the Fair Housing and Americans with Disabilities Acts.

## SECTION IV. FAIR HOUSING ANALYSIS

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

### A. SOCIO-ECONOMIC OVERVIEW

The following section includes data from a variety of sources including the 2000 and 2010 Census, the 2016 Five-Year American Community Survey (ACS), the Bureau of Labor Statistics (BLS), and the Bureau of Economic Analysis (BEA).

#### DEMOGRAPHICS

##### Population Estimates

Table IV.1, shows the population for Biloxi. As can be seen, the population in Biloxi increased from 44,054 persons in 2010 to 45,908 persons in 2017, or by 4.2 percent.

Several pieces of data presented in the profile are only available at the county level. A sub-set of the county level data is presented here to give a more complete view of Biloxi.

##### Census Demographic Data

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

To study these important concepts the Census Bureau distributes the American Community Survey every year to a sample of the population and quantifies the results as one-, three- and five-year averages. The one-year sample only includes responses from the year the survey was implemented, while the five-year sample includes responses over a five-year period. Since the five-

Year	Population	Percent Yearly Change
2000	50,965	.
2001	50,518	-0.9%
2002	50,147	-0.7%
2003	49,223	-1.8%
2004	49,880	1.3%
2005	49,629	-0.5%
2006	43,395	-12.6%
2007	43,902	1.2%
2008	44,156	0.6%
2009	44,027	-0.3%
2010	44,054	0.1%
2011	44,405	0.8%
2012	44,593	0.4%
2013	44,715	0.3%
2014	44,921	0.5%
2015	45,436	1.1%
2016	45,687	0.6%
2017	45,908	0.5%

year estimates include more responses, the estimates can be tabulated down to the Census tract level and are considered more robust than the one- or three-year sample estimates.

## Population Characteristics

The following section describes the population characteristics in Biloxi. While the total population in Biloxi declined between 2000 and 2016, many minority populations are increasing as a percentage of the population. These changes are described in further detail in the following section.

Table IV.2 shows population by age for the 2000 and 2010 Census. The population changed by -13.0% overall between 2000 and 2010. Various age cohorts changed at different rates. The elderly population, or persons aged 65 or older, changed by -12.1% to a total of 5,337 persons in 2010. Those aged 25 to 34 changed by -13.3 percent, and those aged under 5 changed by -15.6 percent.

Age	2000 Census		2010 Census		% Change 00-10
	Population	% of Total	Population	% of Total	
Under 5	3,721	7.3%	3,139	7.1%	-15.6%
5 to 19	11,002	21.7%	8,534	19.4%	-22.4%
20 to 24	4,779	9.4%	4,581	10.4%	-4.1%
25 to 34	7,645	15.1%	6,625	15.0%	-13.3%
35 to 54	13,517	26.7%	11,179	25.4%	-17.3%
55 to 64	3,905	7.7%	4,659	10.6%	19.3%
65 or Older	6,075	12.0%	5,337	12.1%	-12.1%
<b>Total</b>	<b>50,644</b>	<b>100.0%</b>	<b>44,054</b>	<b>100.0%</b>	<b>-13.0%</b>

The elderly population is further explored in Table IV.3. Those aged 65 to 66 changed by -10.1% between 2000 and 2010, resulting in a population of 664 persons. Those aged 85 or older changed by 8.2% during the same time period, and resulted in 659 persons over age 85 in 2010.

Age	2000 Census		2010 Census		% Change 00-10
	Population	% of Total	Population	% of Total	
65 to 66	739	12.2%	664	12.4%	-10.1%
67 to 69	1,096	18.0%	927	17.4%	-15.4%
70 to 74	1,555	25.6%	1,250	23.4%	-19.6%
75 to 79	1,303	21.4%	1,113	20.9%	-14.6%
80 to 84	773	12.7%	724	13.6%	-6.3%
85 or Older	609	10.0%	659	12.3%	8.2%
<b>Total</b>	<b>6,075</b>	<b>100.0%</b>	<b>5,337</b>	<b>100.0%</b>	<b>-12.1%</b>

Population by race and ethnicity is shown in Table IV.4. The white population represented 68.4% of the total population in 2010. The black population changed by -10.5 percent, represented 19.6% of the population in 2010. The American Indian and Asian populations represented 0.5 and 4.4 percent, respectively, in 2010. As for ethnicity, the Hispanic population changed by 108.2% between 2000 and 2010, compared to the -17.6% change for non-Hispanics.

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	36,177	71.4%	30,129	68.4%	-16.7%
Black	9,643	19.0%	8,632	19.6%	-10.5%
American Indian	248	0.5%	221	0.5%	-10.9%
Asian	2,590	5.1%	1,951	4.4%	-24.7%
Native Hawaiian/ Pacific Islander	58	0.1%	108	0.2%	86.2%
Other	725	1.4%	1,662	3.8%	129.2%
Two or More Races	1,203	2.4%	1,351	3.1%	12.3%
<b>Total</b>	<b>50,644</b>	<b>100.0%</b>	<b>44,054</b>	<b>100.0%</b>	<b>-13.0%</b>
<b>Hispanic</b>	1,848	3.6%	3,847	8.7%	108.2%
<b>Non-Hispanic</b>	48,796	96.4%	40,207	91.3%	-17.6%

Population by race and ethnicity through 2016 is shown in Table IV.5. The white population represented 65.8% of the population in 2016, compared with the black population accounting for 21.3% of the population. Hispanic households represented 7.8% of the population in 2016.

Race	2010 Census		2016 Five-Year ACS	
	Population	% of Total	Population	% of Total
White	30,129	68.4%	29,780	65.8%
Black	8,632	19.6%	9,651	21.3%
American Indian	221	0.5%	140	0.3%
Asian	1,951	4.4%	2,114	4.7%
Native Hawaiian/ Pacific Islander	108	0.2%	0	0.0%
Other	1,662	3.8%	1,327	2.9%
Two or More Races	1,351	3.1%	2,259	5.0%
<b>Total</b>	<b>44,054</b>	<b>100.0%</b>	<b>45,271</b>	<b>100.0%</b>
<b>Non-Hispanic</b>	40,207	91.3%	41,737	92.2%
<b>Hispanic</b>	3,847	8.7%	3,534	7.8%

The population by race is broken down further by ethnicity in Table IV.6, on the following page. While the white non-Hispanic population changed by -19.5% between 2000 and 2010, the white Hispanic population changed by 95.1 percent. The black non-Hispanic population changed by -11.3 percent, while the black Hispanic population changed by 90.5 percent.

<b>Table IV.6</b>					
<b>Population by Race and Ethnicity</b>					
City of Biloxi					
2000 & 2010 Census Data					
Race	2000		2010 Census		% Change 00 - 10
	Population	% of Total	Population	% of Total	
<b>Non-Hispanic</b>					
White	35,292	72.3%	28,402	70.6%	-19.5%
Black	9,569	19.6%	8,491	21.1%	-11.3%
American Indian	232	0.5%	160	0.4%	-31.0%
Asian	2,558	5.2%	1,923	4.8%	-24.8%
Native Hawaiian/ Pacific Islander	50	0.1%	84	0.2%	68.0%
Other	75	0.2%	68	0.2%	-9.3%
Two or More Races	1,020	2.1%	1,079	2.7%	5.8%
<b>Total Non-Hispanic</b>	<b>48,796</b>	<b>100.0%</b>	<b>40,207</b>	<b>100.0%</b>	<b>-17.6%</b>
<b>Hispanic</b>					
White	885	47.9%	1,727	44.9%	95.1%
Black	74	4.0%	141	3.7%	90.5%
American Indian	16	0.9%	61	1.6%	281.2%
Asian	32	1.7%	28	0.7%	-12.5%
Native Hawaiian/ Pacific Islander	8	0.4%	24	0.6%	200.0%
Other	650	35.2%	1,594	41.4%	145.2%
Two or More Races	183	9.9%	272	7.1%	48.6%
<b>Total Hispanic</b>	<b>1,848</b>	<b>100.0%</b>	<b>3,847</b>	<b>100.0%</b>	<b>108.2%</b>
<b>Total Population</b>	<b>50,644</b>	<b>100.0%</b>	<b>44,054</b>	<b>100.0%</b>	<b>-13.0%</b>

As demonstrated by 2010 Census and 2016 Five-Year ACS Data, the change in race and ethnicity is shown in Table IV.7. During this period, the total non-Hispanic population changed from 40,207 persons in 2010 to 41,737 persons in 2016. The Hispanic population decreased from 3,847 persons to 3,534 persons.

<b>Table IV.7</b>				
<b>Population by Race and Ethnicity</b>				
City of Biloxi				
2010 Census & 2016 Five-Year ACS				
Race	2010 Census		2016 Five-Year ACS	
	Population	% of Total	Population	% of Total
<b>Non-Hispanic</b>				
White	28,402	70.6%	27,353	65.5%
Black	8,491	21.1%	9,588	23.0%
American Indian	160	0.4%	44	0.1%
Asian	1,923	4.8%	2,114	5.1%
Native Hawaiian/ Pacific Islander	84	0.2%	0	0.0%
Other	68	0.2%	588	1.4%
Two or More Races	1,079	2.7%	2,050	4.9%
<b>Total Non-Hispanic</b>	<b>40,207</b>	<b>100.0%</b>	<b>41,737</b>	<b>100.0%</b>
<b>Hispanic</b>				
White	1,727	44.9%	2,427	68.7%
Black	141	3.7%	63	1.8%
American Indian	61	1.6%	96	2.7%
Asian	28	0.7%	0	0.0%
Native Hawaiian/ Pacific Islander	24	0.6%	0	0.0%
Other	1,594	41.4%	739	20.9%
Two or More Races	272	7.1%	209	5.9%
<b>Total Hispanic</b>	<b>3,847</b>	<b>100.0</b>	<b>3,534</b>	<b>100.0%</b>
<b>Total Population</b>	<b>44,054</b>	<b>100.0%</b>	<b>45,271</b>	<b>100.0%</b>

Households by type and tenure are shown in Table IV.8. Family households represented 61.0% of households, while non-family households accounted for 39.0 percent. These changed from 61.5 and 38.5% between 2010 and 2016.

<b>Table IV.8</b>				
<b>Household Type by Tenure</b>				
City of Biloxi				
2010 Census SF1 & 2016 Five-Year ACS Data				
Household Type	2010 Census		2016 Five-Year ACS	
	Households	Households	Households	% of Total
Family Households	10,526	61.5%	10,787	61.0%
Married-Couple Family	6,829	64.9%	6,900	64.0%
Owner-Occupied	4,496	65.8%	3,935	57.0%
Renter-Occupied	2,333	34.2%	2,965	43.0%
Other Family	3,697	35.1%	3,887	34.3%
Male Householder, No Spouse Present	932	25.2%	1,145	24.0%
Owner-Occupied	399	42.8%	599	52.3%
Renter-Occupied	533	57.2%	546	47.7%
Female Householder, No Spouse Present	2,765	74.8%	2,742	71.1%
Owner-Occupied	955	34.5%	933	34.0%
Renter-Occupied	1,810	65.5%	1,809	66.0%
Non-Family Households	6,578	38.5%	6,898	39.0%
Owner-Occupied	2,573	39.1%	2,158	31.3%
Renter-Occupied	4,005	60.9%	4,740	68.7%
<b>Total</b>	<b>17,104</b>	<b>100.0%</b>	<b>17,685</b>	<b>100.0%</b>

As identified in Table IV.9, the group quarters population was 3,065 in 2010, compared to 3,270 in 2000. Institutionalized populations experienced a -59.8% change between 2000 and 2010. Non-Institutionalized populations experienced a 3.9% change during this same time period.

<b>Table IV.9</b>					
<b>Group Quarters Population</b>					
City of Biloxi					
2000 & 2010 Census SF1 Data					
Group Quarters Type	2000 Census		2010 Census		% Change 00-10
	Population	% of Total	Population	% of Total	
<b>Institutionalized</b>					
Correctional Institutions	27	5.2%	0	0.0%	-100.0%
Juvenile Facilities	.	.	28	13.4%	.
Nursing Homes	219	42.1%	158	75.6%	-27.9%
Other Institutions	274	52.7%	23	11.0%	-91.6%
<b>Total</b>	<b>520</b>	<b>100.0%</b>	<b>209</b>	<b>100.0%</b>	<b>-59.8%</b>
<b>Non-Institutionalized</b>					
College Dormitories	73	2.7%	0	0.0%	-100.0%
Military Quarters	2,560	93.1%	2,726	95.4%	6.5%
Other Non-Institutionalized	117	4.3%	130	4.6%	11.1%
<b>Total</b>	<b>2,750</b>	<b>100.0%</b>	<b>2,856</b>	<b>100.0%</b>	<b>3.9%</b>
<b>Group Quarters Population</b>	<b>3,270</b>	<b>100.0%</b>	<b>3,065</b>	<b>100.0%</b>	<b>-6.3%</b>

The number of foreign-born persons is shown in Table IV.10. An estimated 1.5% of the population was born in Mexico with 1.3% born in Vietnam and another 0.4% were born in Philippines.

<b>Table IV.10</b> <b>Place of Birth for the Foreign-Born Population</b> City of Biloxi 2016 Five-Year ACS			
Number	Country	Number of Persons	Percent of Total Population
#1 country of origin	Mexico	671	1.5%
#2 country of origin	Vietnam	582	1.3%
#3 country of origin	Philippines	198	0.4%
#4 country of origin	India	174	0.4%
#5 country of origin	Jamaica	159	0.4%
#6 country of origin	Honduras	152	0.3%
#7 country of origin	Peru	132	0.3%
#8 country of origin	Japan	122	0.3%
#9 country of origin	Germany	100	0.2%
#10 country of origin	Korea	91	0.2%

Limited English Proficiency and the non-English language spoken at home are shown in Table IV.11. An estimated 2.5% of the population speaks Spanish at home, followed by 1.2% speaking Vietnamese.

<b>Table IV.11</b> <b>Limited English Proficiency and Language Spoken at Home</b> City of Biloxi 2016 Five-Year ACS			
Number	Country	Number of Persons	Percent of Total Population
#1 LEP Language	Spanish	1,023	2.5%
#2 LEP Language	Vietnamese	506	1.2%
#3 LEP Language	Other Asian and Pacific Island languages	152	0.4%
#4 LEP Language	Other Indo-European languages	62	0.1%
#5 LEP Language	Chinese	40	0.1%
#6 LEP Language	French, Haitian, or Cajun	40	0.1%
#7 LEP Language	Korean	33	0.1%
#8 LEP Language	Tagalog	23	0.1%
#9 LEP Language	German or other West Germanic languages	18	0.0%
#10 LEP Language	Arabic	15	0%

## Education

Education and employment data, as estimated by the 2016 ACS, is presented in Table IV.12. In 2016, some 17,950 persons were employed and 2,025 were unemployed. This totaled a civilian labor force of 19,975 persons. The unemployment rate for Biloxi was estimated to be 10.1% in 2016.

<b>Table IV.12</b>	
<b>Employment, Labor Force and Unemployment</b>	
City of Biloxi	
2016 Five-Year ACS Data	
<b>Employment Status</b>	<b>2016 Five-Year ACS</b>
Employed	17,950
Unemployed	2,025
<b>Labor Force</b>	<b>19,975</b>
Unemployment Rate	10.1%

In 2016, 87.7% of households in Biloxi had a high school education or greater.

<b>Table IV.13</b>	
<b>High School or Greater Education</b>	
City of Biloxi	
2016 Five-Year ACS Data	
<b>Education Level</b>	<b>Households</b>
High School or Greater	15,513
Total Households	17,685
<b>Percent High School or Above</b>	<b>87.7%</b>

As seen in Table IV.14, 27.8% of the population had a high school diploma or equivalent, another 38.2% had some college, 13.3% had a Bachelor's Degree, and 7.0% of the population had a graduate or professional degree.

<b>Table IV.14</b>		
<b>Educational Attainment</b>		
City of Biloxi		
2016 Five-Year ACS Data		
<b>Education Level</b>	<b>Population</b>	<b>Percent</b>
Less Than High School	4,751	13.7%
High School or Equivalent	9,646	27.8%
Some College or Associates Degree	13,248	38.2%
Bachelor's Degree	4,622	13.3%
Graduate or Professional Degree	2,441	7.0%
<b>Total Population Above 18 years</b>	<b>34,708</b>	<b>100.0%</b>

## ECONOMICS

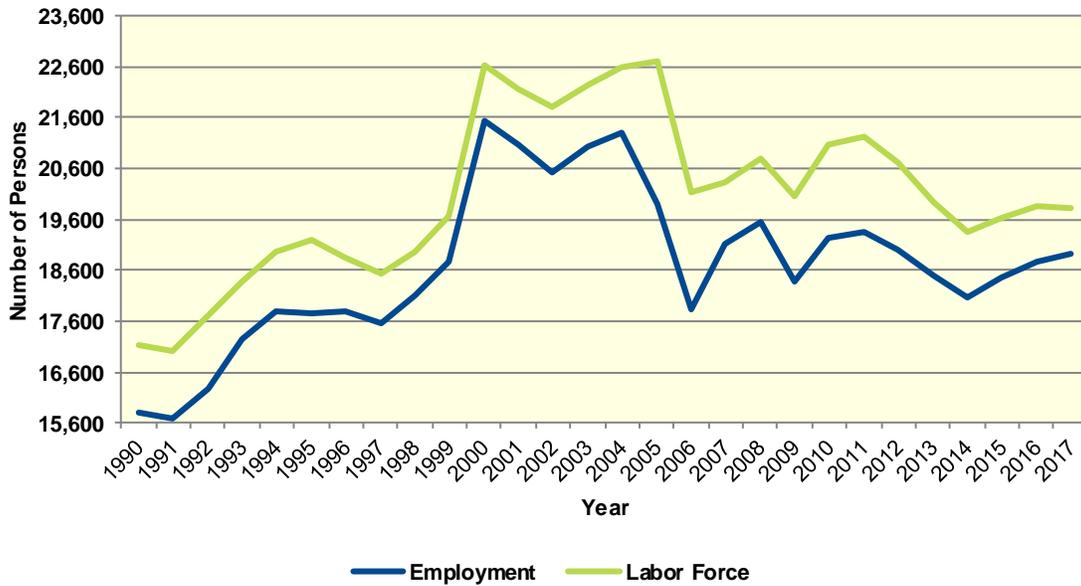
### Labor Force

Table IV.16, shows the labor force statistics for Biloxi from 1990 to the present. Over the entire series the lowest unemployment rate occurred in 1999 with a rate of 4.5 percent. The highest level of unemployment occurred during 2005 rising to a rate of 12.3 percent. This compared to a statewide low of 5.1% in 1999 and statewide high of 10.4% in 2010. From 2016 to 2017 the unemployment rate in Biloxi decreased from 5.6% to 4.7 percent, which compared to a statewide decrease to 5.1 percent. Local officials contribute much of the high levels of unemployment to Hurricane Katrina in 2005 and the BP Oil Spill in 2010.

Year	City of Biloxi				Statewide Unemployment Rate
	Unemployment	Employment	Labor Force	Unemployment Rate	
1990	1,294	15,816	17,110	7.6%	7.6%
1991	1,357	15,670	17,027	8.0%	8.5%
1992	1,468	16,263	17,731	8.3%	8.1%
1993	1,117	17,244	18,361	6.1%	6.6%
1994	1,161	17,796	18,957	6.1%	6.3%
1995	1,456	17,746	19,202	7.6%	6.2%
1996	1,063	17,782	18,845	5.6%	6.0%
1997	994	17,553	18,547	5.4%	5.7%
1998	890	18,087	18,977	4.7%	5.3%
1999	889	18,781	19,670	4.5%	5.1%
2000	1,112	21,537	22,649	4.9%	5.4%
2001	1,086	21,087	22,173	4.9%	5.5%
2002	1,289	20,538	21,827	5.9%	6.6%
2003	1,184	21,046	22,230	5.3%	6.3%
2004	1,286	21,290	22,576	5.7%	6.2%
2005	2,792	19,909	22,701	12.3%	7.5%
2006	2,314	17,826	20,140	11.5%	6.5%
2007	1,232	19,107	20,339	6.1%	6.1%
2008	1,248	19,554	20,802	6.0%	6.6%
2009	1,686	18,384	20,070	8.4%	9.5%
2010	1,834	19,218	21,052	8.7%	10.4%
2011	1,870	19,345	21,215	8.8%	10.0%
2012	1,716	19,002	20,718	8.3%	9.0%
2013	1,454	18,485	19,939	7.3%	8.5%
2014	1,279	18,077	19,356	6.6%	7.5%
2015	1,173	18,466	19,639	6.0%	6.4%
2016	1,103	18,770	19,873	5.6%	5.8%
2017	924	18,909	19,833	4.7%	5.1%

Diagram IV.1, shows the employment and labor force for Biloxi. The difference between the two lines represents the number of unemployed persons. In the most recent year, employment stood at 18,909 persons, with the labor force reaching 19,833, indicating there were a total of 924 unemployed persons.

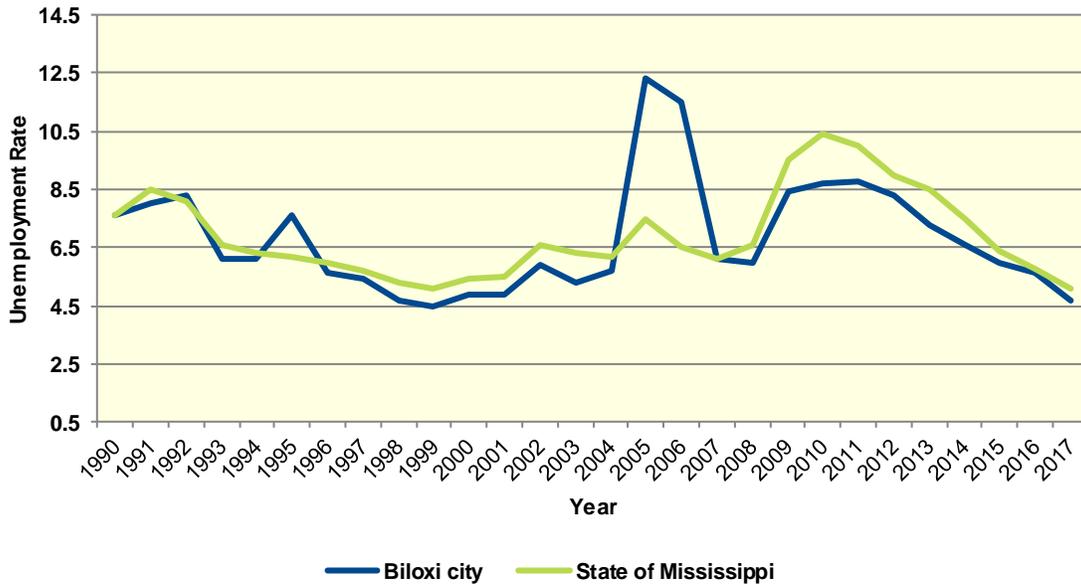
**Diagram IV.1**  
**Employment and Labor Force**  
 City of Biloxi  
 1990 – 2017 BLS Data



### Unemployment

Diagram IV.2 shows the annual unemployment rate for both the State and Biloxi. During the 1990s the average rate for Biloxi was 6.3 percent, which compared to 6.5% statewide. Between 2000 and 2010, the average unemployment rate was 7.1% in Biloxi, compared to 6.6% statewide. Since 2010 the average unemployment rate was 7.0 percent. Over the course of the entire period, Biloxi had an average unemployment rate lower than the state, 6.8% for Biloxi, versus 6.9% statewide.

**Diagram IV.2**  
**Annual Unemployment Rate**  
 City of Biloxi  
 1990 – 2016 BLS Data



### Harrison County Earnings

The Bureau of Economic Analysis (B.E.A.) produces regional economic accounts which provide a consistent framework for analyzing and comparing individual state and local area economies. Diagram IV.3 shows real average earnings per job for Harrison County from 1990 to 2017. Over this period the average earnings per job for Harrison County was \$43,596, compared to the statewide average of \$40,877 over the same period.

**Diagram IV.3**  
**Real Average Earnings Per Job**  
 Harrison County  
 BEA Data 1990 - 2017

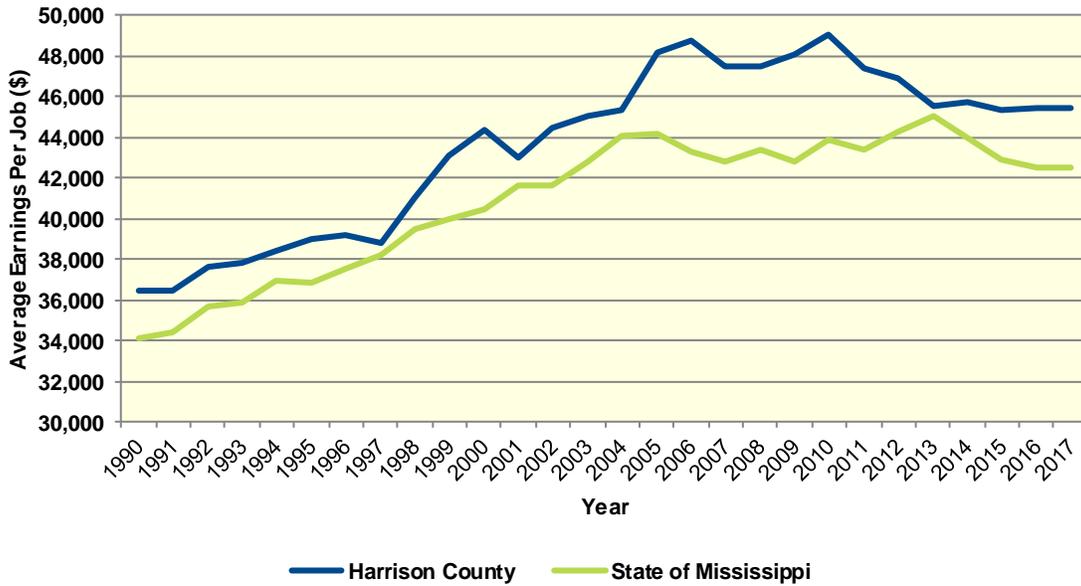
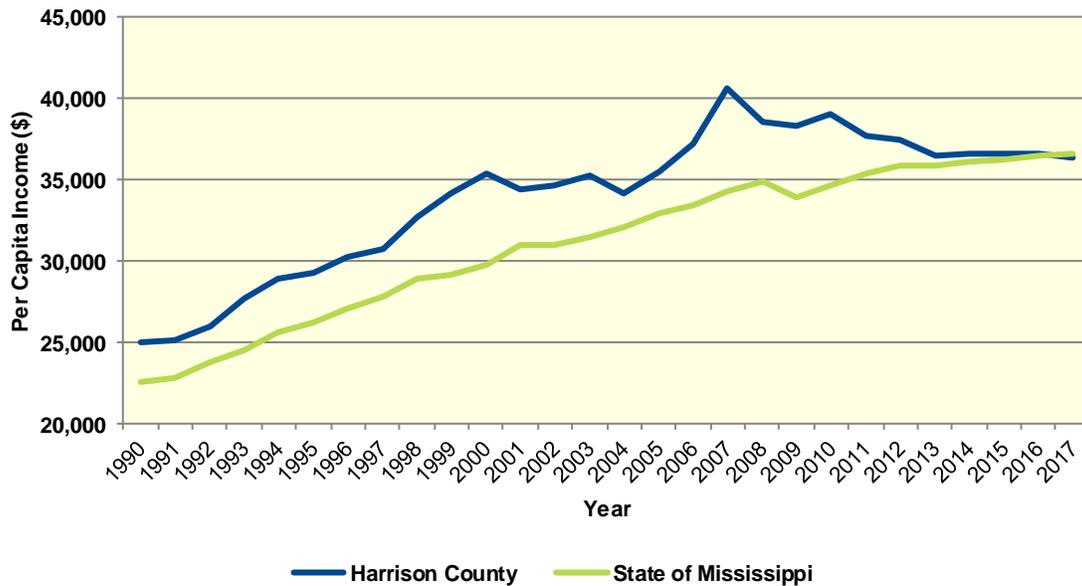


Diagram IV.4 shows real per capita income for Harrison County from 1990 to 2017, which is calculated by dividing total personal income from all sources by population. Per capita income is a broader measure of wealth than real average earnings per job, which only captures the working population. Over this period the real per capita income for Harrison County was \$33,958, which was higher than the statewide average of \$31,091 over the same period.

**Diagram IV.4**  
**Real Per Capita Income**  
 Harrison County  
 BEA Data 1990 - 2017



**Poverty**

Table IV.16, presents poverty data for Harrison County. Poverty is the condition of having insufficient resources or income. In its extreme form, poverty is a lack of basic human needs, such as adequate and healthy food, clothing, housing, water, and health services. According to the Census Bureau’s Small Area Income and Poverty Estimates Program, the number of individuals in poverty increased in Harrison County from 35,796 in 2010 to 39,266 in 2017, with the poverty rate reaching 19.7% in 2017. This compared to a state poverty rate of 19.9% and a national rate of 13.4% in 2017.

Table IV.17, shows poverty by age from the 2010 and 2016 five-year ACS data for the City of Biloxi. As can be seen, the 2010 5-year ACS had a poverty rate of 12.9% versus 25.4% in the most recent 2016 data.

Year	Persons in Poverty	Poverty Rate
2000	26,637	14.5%
2001	29,622	16.1%
2002	30,237	16.3%
2003	30,653	16.4%
2004	31,809	16.9%
2005	29,831	16.1%
2006	26,586	16.0%
2007	26,351	15.6%
2008	27,768	16.2%
2009	31,675	18.2%
2010	35,796	19.7%
2011	37,971	20.5%
2012	38,660	20.5%
2013	43,428	22.7%
2014	36,288	18.8%
2015	43,019	22.0%
2016	40,472	20.5%
2017	39,266	19.7%

<b>Table IV.17</b>				
<b>Poverty by Age</b>				
City of Biloxi				
2010 Five-Year ACS & 2016 Five-Year ACS Data				
<b>Age</b>	<b>2010 Five-Year ACS</b>		<b>2016 Five-Year ACS</b>	
	<b>Persons in Poverty</b>	<b>% of Total</b>	<b>Persons in Poverty</b>	<b>% of Total</b>
Under 6	806	14.8%	1,970	18.4%
6 to 17	930	17.1%	2,586	24.1%
18 to 64	3,341	61.3%	5,333	49.7%
65 or Older	377	6.9%	839	7.8%
<b>Total</b>	<b>5,454</b>	<b>100.0%</b>	<b>10,728</b>	<b>100.0%</b>
<b>Poverty Rate</b>	<b>12.9%</b>	<b>.</b>	<b>25.4%</b>	<b>.</b>

## HOUSING

### Housing Production

The Census Bureau reports building permit authorizations and “per unit” valuation of building permits annually. Single-family construction usually represents most residential development in the area. Single-family building permit authorizations in Biloxi increased from 93 authorizations in 2016 to 134 authorizations in 2017.

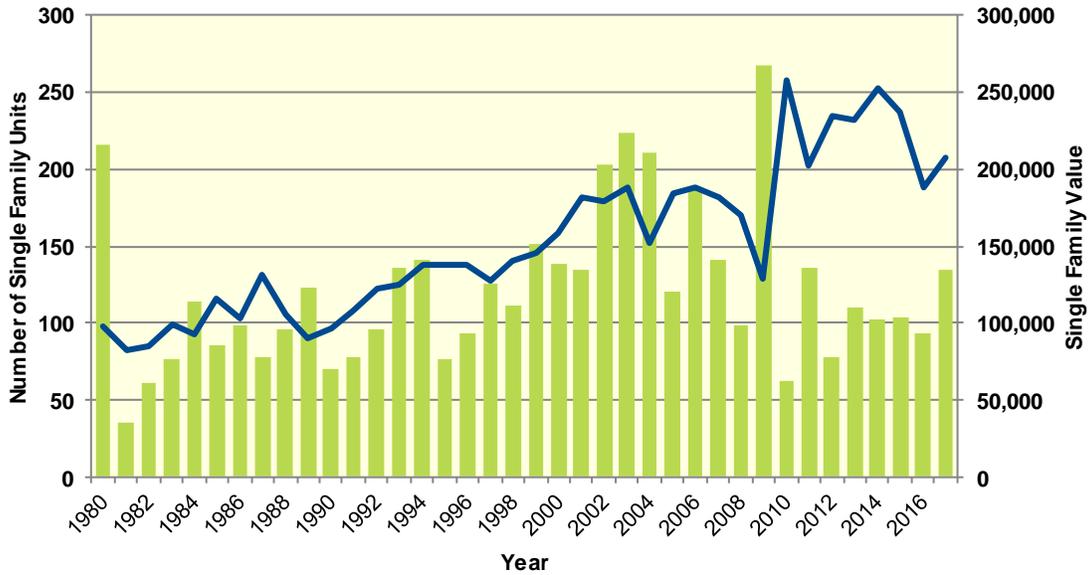
The real value of single-family building permits increased from \$187,600 in 2016 to \$207,239 in 2017. This is significantly higher than the increase in permit values statewide, with values rising from \$176,345 in 2016 to \$177,631 in 2017. Additional details are given in Table IV.18.

**Table IV.18**  
**Building Permits and Valuation**  
 City of Biloxi  
 Census Bureau Data, 1980–2017

Year	Authorized Construction in Permit Issuing Areas					Per Unit Valuation, (Real 2016\$)	
	Single-Family	Duplex Units	Tri- and Four-Plex	Multi-Family Units	Total Units	Single-Family Units	Multi-Family Units
1980	216	0.0	0.0	318	534	98,097	44,224
1981	35	0.0	4.0	41	80	82,638	39,756
1982	61	2.0	0.0	109	172	84,701	59,573
1983	76	4.0	144	195	419	99,482	89,133
1984	114	0.0	8.0	287	409	92,737	33,347
1985	86	0.0	12.0	159	257	115,395	38,959
1986	99	0.0	8.0	305	412	103,357	32,863
1987	78	2.0	4.0	0.0	84	131,849	0
1988	96	0.0	0.0	52	148	105,628	56,231
1989	123	0.0	0.0	0	123	90,140	0
1990	70	0.0	0.0	0	70	96,123	0
1991	78	2.0	0.0	0.0	80	107,864	0
1992	96	0.0	4.0	0.0	100	122,557	0
1993	136	0.0	8.0	0.0	144	124,900	0
1994	141	2.0	0.0	370	513	138,242	44,456
1995	76	0.0	6.0	162	244	137,213	78,255
1996	93	2.0	0.0	216	311	137,321	64,700
1997	126	2.0	3.0	92	223	127,254	61,633
1998	112	0.0	18.0	525	655	140,469	55,787
1999	151	2.0	16.0	0	169	145,629	0
2000	139	26.0	0.0	58	223	158,506	54,924
2001	135	10.0	0.0	48	193	181,581	64,893
2002	203	0.0	0.0	240	443	178,753	39,816
2003	224	2.0	0.0	276	502	188,014	242,893
2004	210	28.0	34.0	0	272	151,675	0
2005	120	0.0	0.0	260	380	183,713	71,137
2006	186	2.0	0.0	0	188	187,837	0
2007	141	0.0	11.0	480	632	181,749	95,580
2008	98	20.0	4.0	340	462	170,390	75,718
2009	267	4.0	22.0	0.0	293	128,265	0
2010	63	0.0	0.0	0.0	63	257,519	0
2011	136	0.0	8.0	0.0	144	202,664	0
2012	78	2.0	0.0	0.0	80	234,676	0
2013	110	0.0	0.0	0	110	232,035	0
2014	102	0.0	0.0	224	326	251,931	108,608
2015	104	0.0	0.0	0.0	104	237,515	0
2016	93	0.0	8.0	0.0	101	187,600	0
2017	134	0.0	0.0	0.0	134	207,239	0

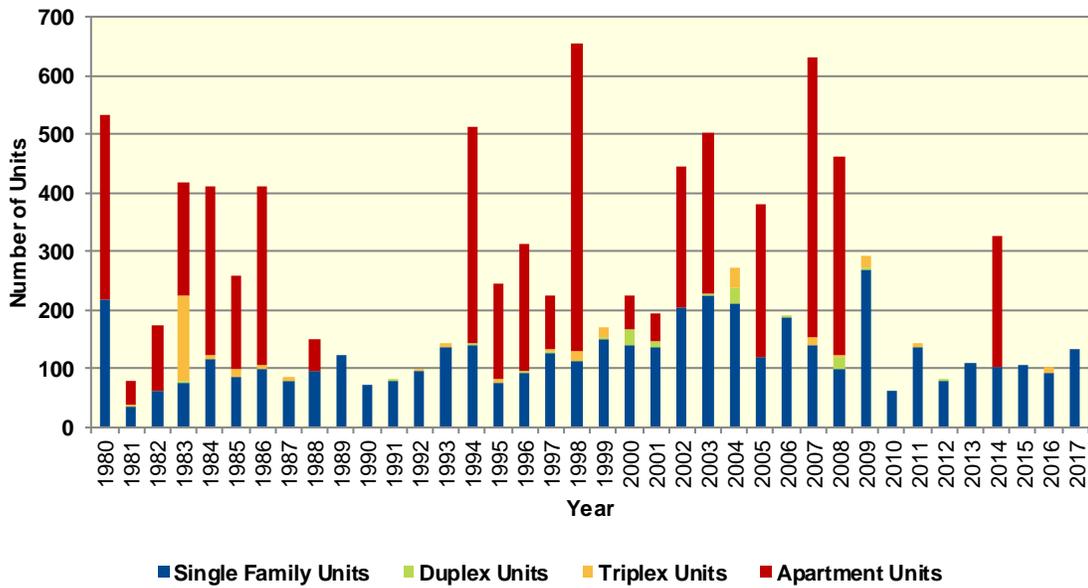
### Diagram IV.5 Single-Family Permits

City of Biloxi  
Census Bureau Data, 1980–2017



### Diagram IV.6 Total Permits by Unit Type

City of Biloxi  
Census Bureau Data, 1980–2017



## Housing Characteristics

Housing types by unit are shown in Table IV.19. In 2016, there were 21,258 housing units, up from 22,147 in 2000. Single-family units accounted for 54.1% of units in 2016, compared to 59.6% in 2000. Apartment units accounted for 30.6% in 2016, compared to 22.5% in 2000.

<b>Table IV.19</b>				
<b>Housing Units by Type</b>				
City of Biloxi				
2000 Census SF3 & 2016 Five-Year ACS Data				
Unit Type	2000 Census		2016 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	13,189	59.6%	11,508	54.1%
Duplex	753	3.4%	806	3.8%
Tri- or Four-Plex	1,407	6.4%	963	4.5%
Apartment	4,992	22.5%	6	30.6%
Mobile Home	1,770	8.0%	1,467	6.9%
Boat, RV, Van, Etc.	36	0.2%	0	0.0%
<b>Total</b>	<b>22,147</b>	<b>100.0%</b>	<b>21,258</b>	<b>100.0%</b>

In 2010, there were 21,250 housing units, compared with 21,258 in 2016. Single-family units accounted for 54.1% of units in 2016, compared to 60.4% in 2010. Apartment units accounted for 30.6% in 2016, compared to 24.3% in 2010.

<b>Table IV.20</b>				
<b>Housing Units by Type</b>				
City of Biloxi				
2010 Five-Year ACS & 2016 Five-Year ACS Data				
Unit Type	2010 Five-Year ACS		2016 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	12,837	60.4%	11,508	54.1%
Duplex	509	2.4%	806	3.8%
Tri- or Four-Plex	890	4.2%	963	4.5%
Apartment	5,155	24.3%	6,514	30.6%
Mobile Home	1,820	8.6%	1,467	6.9%
Boat, RV, Van, Etc.	39	0.2%	0	0.0%
<b>Total</b>	<b>21,250</b>	<b>100.0%</b>	<b>21,258</b>	<b>100.0%</b>

As shown in Table IV.21, some 80.4% of housing was occupied in 2010, compared to 88.6% in 2000. Owner-occupied housing changed -12.0% between 2000 and 2010, ending with owner-occupied units representing 49.2% of units. Vacant units changed by 65.2 percent, resulting in 4,174 vacant units in 2010.

<b>Table IV.21</b>					
<b>Housing Units by Tenure</b>					
City of Biloxi					
2000 & 2010 Census SF1 Data					
Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	19,588	88.6%	17,104	80.4%	-12.7%
Owner-Occupied	9,573	48.9%	8,423	49.2%	-12.0%
Renter-Occupied	10,015	51.1%	8,681	50.8%	-13.3%
Vacant Housing Units	2,527	11.4%	4,174	19.6%	65.2%
<b>Total Housing Units</b>	<b>22,115</b>	<b>100.0%</b>	<b>21,278</b>	<b>100.0%</b>	<b>-3.8%</b>

Table IV.22 shows housing units by tenure from 2010 to 2016. By 2016, there were 21,258 housing units. An estimated 43.1% were owner-occupied, and 16.8% were vacant.

<b>Table IV.22</b>				
<b>Housing Units by Tenure</b>				
City of Biloxi				
2010 Census & 2016 Five-Year ACS Data				
Tenure	2010 Census		2016 Five-Year ACS	
	Units	% of Total	Units	% of Total
Occupied Housing Units	17,104	80.4%	17,685	83.2%
Owner-Occupied	8,423	49.2%	7,625	43.1%
Renter-Occupied	8,681	50.8%	10,060	56.9%
Vacant Housing Units	4,174	19.6%	3,573	16.8%
<b>Total Housing Units</b>	<b>21,278</b>	<b>100.0%</b>	<b>21,258</b>	<b>100.0%</b>

Households by household size are shown in Table IV.23. There was a total of 17,104 households in 2010, a decrease from 19,588 households in 2000. One-person households changed by -9.6% between 2000 and 2010, while two-person households changed by -12.3 percent. Three and four-person households changed by -13.1% and -20.8% respectively, representing 16.8% and 11.3% of the population in 2010.

<b>Table IV.23</b>					
<b>Households by Household Size</b>					
City of Biloxi					
2000 & 2010 Census SF1 Data					
Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
One Person	5,904	30.1%	5,340	31.2%	-9.6%
Two Persons	6,287	32.1%	5,514	32.2%	-12.3%
Three Persons	3,303	16.9%	2,871	16.8%	-13.1%
Four Persons	2,439	12.5%	1,932	11.3%	-20.8%
Five Persons	1,072	5.5%	857	5.0%	-20.1%
Six Persons	380	1.9%	357	2.1%	-6.1%
Seven Persons or More	203	1.0%	233	1.4%	14.8%
<b>Total</b>	<b>19,588</b>	<b>100.0%</b>	<b>17,104</b>	<b>100.0%</b>	<b>-12.7%</b>

Households by income for the 2010 and 2016 5-year ACS are shown in Table IV.24. Households earning more than \$100,000 per year represented 13.7% of households in 2016, compared to 16.3% in 2010. Meanwhile, households earning less than \$15,000 accounted for 17.8% of households in 2016, compared to 13.7% in 2000.

<b>Table IV.24</b>				
<b>Households by Income</b>				
City of Biloxi				
2010 Five-Year ACS & 2016 Five-Year ACS Data				
<b>Income</b>	<b>2010 Five-Year ACS</b>		<b>2016 Five-Year ACS</b>	
	<b>Households</b>	<b>% of Total</b>	<b>Households</b>	<b>% of Total</b>
Less than \$15,000	2,363	13.7%	3,150	17.8%
\$15,000 to \$19,999	869	5.1%	1,203	6.8%
\$20,000 to \$24,999	1,318	7.7%	1,450	8.2%
\$25,000 to \$34,999	1,894	11.0%	2,173	12.3%
\$35,000 to \$49,999	2,525	14.7%	2,549	14.4%
\$50,000 to \$74,999	3,397	19.8%	2,918	16.5%
\$75,000 to \$99,999	2,034	11.8%	1,812	10.2%
\$100,000 or More	2,800	16.3%	2,430	13.7%
<b>Total</b>	<b>17,200</b>	<b>100.0%</b>	<b>17,685</b>	<b>100.0%</b>

Table IV.25, shows households by year home built for the 2010 and 2016 5-year ACS data. Housing units built between 2000 and 2009 account for 25.4% in 2016 and 18.4% of households in 2010. Housing units built prior to 1939 represented 3.2% of households in 2016 and 2.9% of households in 2010.

<b>Table IV.25</b>				
<b>Households by Year Home Built</b>				
City of Biloxi				
2010 Five-Year ACS & 2016 Five-Year ACS Data				
<b>Year Built</b>	<b>2010 Five-Year ACS</b>		<b>2016 Five-Year ACS</b>	
	<b>Households</b>	<b>% of Total</b>	<b>Households</b>	<b>% of Total</b>
1939 or Earlier	492	2.9%	565	3.2%
1940 to 1949	898	5.2%	727	4.1%
1950 to 1959	1,579	9.2%	1,488	8.4%
1960 to 1969	2,424	14.1%	1,906	10.8%
1970 to 1979	3,115	18.1%	2,677	15.1%
1980 to 1989	2,255	13.1%	2,021	11.4%
1990 to 1999	3,276	19.0%	3,263	18.5%
2000 to 2009	3,161	18.4%	4,489	25.4%
2010 or Later			549	3.1%
<b>Total</b>	<b>17,200</b>	<b>100.0%</b>	<b>17,685</b>	<b>100.0%</b>

The distribution of unit types by race is shown in Table IV.26. An estimated 65.7% of white households occupy single-family homes, while 38.7% of black households occupy single-family homes. Some 20.3% of white households occupy apartments, while 46.7% of black households occupy apartments. An estimated 50.7% of Asian, and 76.9% of American Indian households occupy single-family homes.

**Table IV.26**  
**Distribution of Units in Structure by Race**  
 City of Biloxi  
 2016 Five-Year ACS Data

Unit Type	White	Black	American Indian	Asian	Native Hawaiian/ Pacific Islanders	Other	Two or More Races
Single-Family	65.7%	38.7%	76.9%	50.7%	N/A	38.2%	47.0%
Duplex	2.5%	4.4%	0.0%	9.8%	N/A	6.5%	1.7%
Tri- or Four-Plex	3.6%	9.3%	0.0%	0.0%	N/A	0.0%	0.0%
Apartment	20.3%	46.7%	23.1%	31.3%	N/A	32.5%	42.5%
Mobile Home	7.9%	0.9%	0.0%	8.1%	N/A	22.8%	8.8%
Boat, RV, Van, Etc.	0.0%	0.0%	0.0%	0.0%	N/A	0.0%	0.0%
<b>Total</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	N/A	<b>100.0%</b>	<b>100.0%</b>

The disposition of vacant housing units in 2000 and 2010 is shown in Table IV.27. An estimated 52.7% of vacant units were for rent in 2010, a 100.1% change since 2000. In addition, some 8.1% of vacant units were for sale, a change of 42.3% between 2000 and 2010. “Other” vacant units represented 25.6% of vacant units in 2010. This is a change of 39.2% since 2000. “Other” vacant units are not for sale or rent, or otherwise available to the marketplace. These units may be problematic if concentrated in certain areas and may create a “blighting” effect.

**Table IV.27**  
**Disposition of Vacant Housing Units**  
 City of Biloxi  
 2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
For Rent	1,100	43.5%	2,201	52.7%	100.1%
For Sale	239	9.5%	340	8.1%	42.3%
Rented or Sold, Not Occupied	130	5.1%	88	2.1%	-32.3%
For Seasonal, Recreational, or Occasional Use	282	11.2%	468	11.2%	66.0%
For Migrant Workers	8	0.3%	8	0.2%	0.0%
Other Vacant	768	30.4%	1,069	25.6%	39.2%
<b>Total</b>	<b>2,527</b>	<b>100.0%</b>	<b>4,174</b>	<b>100.0%</b>	<b>65.2%</b>

The disposition of vacant units between 2010 and 2016 is shown in Table IV.28. By 2016, for rent units accounted for 49.5% of vacant units, while for sale units accounted for 5.8 percent. “Other” vacant units accounted for 15.8% of vacant units, representing a total of 564 “other” vacant units.

**Table IV.28**  
**Disposition of Vacant Housing Units**  
 City of Biloxi  
 2010 Census & 2016 Five-Year ACS Data

Disposition	2010 Census		2016 Five-Year ACS	
	Units	% of Total	Units	% of Total
For Rent	2,201	52.7%	1,768	49.5%
For Sale	340	8.1%	209	5.8%
Rented Not Occupied	55	1.3%	189	5.3%
Sold Not Occupied	33	0.8%	114	3.2%
For Seasonal, Recreational, or Occasional Use	468	11.2%	729	20.4%
For Migrant Workers	8	0.2%	0	0.0%
Other Vacant	1,069	25.6%	564	15.8%
<b>Total</b>	<b>4,174</b>	<b>100.0%</b>	<b>3,573</b>	<b>100.0%</b>

## B. HOMELESSNESS AND VULNERABLE POPULATIONS

The following narrative describes the various at-need populations at the statewide Mississippi and Coast level. These populations include persons that are homeless, persons recently released from incarceration, and foster care youth. Homeless data is presented from the Open Doors Coalition Continuum of Care (CoC).

### Open Doors Homeless Coalition CoC

As of the 2018 Point-in-Time count, Mississippi had a total homeless population of 1,352 persons, representing 1,013 individual households. Of these 1,352 persons, 404 were in emergency shelters, 327 were in transitional housing, and another 621 were unsheltered at the time of the count. In the Open Doors Homeless Coalition CoC, there were 346 persons homeless in 2018, according to the Point-in-Time count.

<b>Table IV.29</b>				
<b>Total Homeless Persons</b>				
State of Mississippi Point-in-Time Count Mississippi CoC				
<b>Persons</b>	<b>Sheltered</b>		<b>Unsheltered</b>	<b>Total</b>
	<b>Emergency</b>	<b>Transitional</b>		
Total Number of Persons	<b>404</b>	<b>327</b>	<b>621</b>	<b>1,352</b>
Total Number of Households	308	245	460	<b>1,013</b>
<b>Open Doors Homeless Coalition CoC</b>				
Total Number of Persons	67	58	221	<b>346</b>
Total Number of Households	44	19	216	<b>279</b>

Persons in households with at least one adult and one child accounted for 88 people, representing 26 households. Of these people, 61 were children under the age of 18.

<b>Table IV.30</b>				
<b>Persons in Households with at least one Adult and one Child</b>				
Open Doors Homeless Coalition CoC 2018 Point-in-Time Count				
<b>Persons</b>	<b>Sheltered</b>		<b>Unsheltered</b>	<b>Total</b>
	<b>Emergency</b>	<b>Transitional</b>		
Number of Persons (under age 18)	22	39	0	<b>61</b>
Number of Persons (18 - 24)	2	1	0	<b>3</b>
Number of Persons (over age 24)	12	12	0	<b>24</b>
Total Number of persons (Adults & Children)	<b>36</b>	<b>52</b>	<b>0</b>	<b>88</b>
Total Number of Households	13	13	0	<b>26</b>

At the time of the count, there were no persons in households with only children.

<b>Table IV.31</b>				
<b>Persons in Households with only Children</b>				
Open Doors Homeless Coalition CoC 2018 Point-in-Time Count				
Persons	Sheltered		Unsheltered	Total
	Emergency	Transitional		
Total Number of children (under age 18)	0	0	0	0
Total Number of Households	0	0	0	0

Persons in households without children accounted for 258 people, representing 253 households. 236 of these individuals were over the age of 24, and a vast majority of that population, 202 persons, was unsheltered.

<b>Table IV.32</b>				
<b>Persons in Households without Children</b>				
Open Doors Homeless Coalition CoC 2018 Point-in-Time Count				
Persons	Sheltered		Unsheltered	Total
	Emergency	Transitional		
Number of Persons (18 - 24)	2	1	19	22
Number of Persons (over age 24)	29	5	202	236
Total Number of persons (Adults)	31	6	221	258
Total Number of Households	31	6	216	253

<b>Table IV.33</b>				
<b>Demographic Summary by Race and Ethnicity</b>				
Open Doors Homeless Coalition CoC 2018 Point-in-Time Count				
Race	Sheltered		Unsheltered	Total
	Emergency	Transitional		
Black or African American	32	26	67	125
White	35	32	131	198
Asian	0	0	2	2
American Indian or Alaska Native	0	0	6	6
Native Hawaiian or Other Pacific Islander	0	0	0	0
Multiple Races	0	0	15	15
<b>Total Number of persons (Adults &amp; Children)</b>	<b>67</b>	<b>58</b>	<b>221</b>	<b>346</b>
Hispanic/Latino	3	5	6	14
Non-Hispanic / Non-Latino	64	53	215	332

At the time of the count, there were 3 homeless parenting youth, between the ages of 18 and 24. These 3 persons had a total of 6 children in their care.

<b>Table IV.34</b>				
<b>Homeless Parenting Youth</b>				
Open Doors Homeless Coalition CoC 2018 Point-in-Time Count				
<b>Persons</b>	<b>Sheltered</b>		<b>Unsheltered</b>	<b>Total</b>
	Emergency	Transitional		
Parenting Youth Under 18	0	0	0	<b>0</b>
Parenting Youth 18-24	2	1	0	<b>3</b>
<b>Total Number of Parenting Youth</b>	<b>2</b>	<b>1</b>	<b>0</b>	<b>3</b>
Children of Parenting Youth	4	2	0	<b>6</b>

There were 22 unaccompanied youth at the time of the Point-in-Time count, 19 of whom were unsheltered, with 1 in transitional housing and the remaining 2 in emergency shelters.

<b>Table IV.35</b>				
<b>Unaccompanied Youth</b>				
Open Doors Homeless Coalition CoC 2018 Point-in-Time Count				
<b>Persons</b>	<b>Sheltered</b>		<b>Unsheltered</b>	<b>Total</b>
	Emergency	Transitional		
Unaccompanied Youth Under 18	0	0	0	<b>0</b>
Unaccompanied Youth 18-24	2	1	19	<b>22</b>
<b>Total Number of Persons</b>	<b>2</b>	<b>1</b>	<b>19</b>	<b>22</b>

During the Point-in-Time count, subpopulations are identified. Some 61 of the homeless counted were severely mentally ill, with 61 of those persons unsheltered. 40 homeless persons suffered from chronic substance abuse. At the time of the count, there were 15 homeless veterans. Of the 44 homeless victims of domestic violence, 11 were in emergency shelters, while 18 were in transitional housing and another 15 were unsheltered at the time of the count.

In 2015, the City of Biloxi was recognized by the U.S. Department of Housing and Urban Development (HUD) for its efforts to end veteran homelessness. This was a joint effort between the cities of Biloxi and Gulfport and the regional homeless organization Open Doors Homeless Coalition, Biloxi Veterans Administration, the Biloxi Housing Authority and the Mississippi Housing Authority Region VIII.

<b>Table IV.36</b>				
<b>Summary of all other populations reported</b>				
Open Doors Homeless Coalition CoC 2018 Point-in-Time Count				
<b>Persons (Adults and Children)</b>	<b>Sheltered</b>		<b>Unsheltered</b>	<b>Total</b>
	Emergency	Transitional		
Severely Mentally Ill	10	5	46	<b>61</b>
Chronic Substance Abuse	13	7	20	<b>40</b>
Veterans	0	0	15	<b>15</b>
HIV/AIDS	0	0	2	<b>2</b>
Victims of Domestic Violence	11	18	15	<b>44</b>

Table IV.37, below, shows the yearly counts of homeless veterans in the State of Mississippi. Homelessness of veterans is down since 2012, with 2014 and 2018 being the only years of growth in the past seven years. Homeless veterans hit a low in 2017 at 57 individuals but have nearly doubled since then to 102 in 2018. Despite this, the 2018 homeless veteran population in Mississippi is still under half of 2012.

Year	Sheltered			Unsheltered	Total	Percent Change
	Emergency	Transitional	Total			
2012	.	.	71	173	244	.
2013	.	.	129	81	210	-13.93%
2014	64	157	221	58	279	32.86%
2015	33	54	87	119	206	-26.16%
2016	25	33	58	86	144	-30.10%
2017	11	28	39	18	57	-60.42%
2018	10	27	37	65	102	78.95%

### Persons Released from Incarceration

According to the Bureau of Justice Statistics, in 2016 Mississippi had 18,666 sentenced prisoners under the jurisdiction of state or federal correctional authorities. According to the Mississippi Department of Corrections, in 2018, 794 persons were released from prison in Harrison County. This was an increase of 7 persons compared to 2017, and a decrease of 144 persons since 2015.

Persons	2015			2016			Percent Change		
	Total	Male	Female	Total	Male	Female	Total	Male	Female
Mississippi	18,911	17,595	1,316	19,192	17,823	1,369	1.5%	1.3%	4.0%
U.S. Total	1,526,603	1,415,112	111,491	1,506,757	1,395,141	111,616	-1.3%	-1.4%	0.1%

Persons	2015			2016			Percent Change		
	Total	Male	Female	Total	Male	Female	Total	Male	Female
Mississippi	18,236	17,032	1,204	18,666	17,397	1,269	2.4%	2.1%	5.4%
U.S. Total	1,476,847	1,371,879	104,968	1,459,533	1,353,850	106,683	-1.2%	-1.3%	0.7%

In 2016, Mississippi released 7,080 of these prisoners, 6,443 of whom were released unconditionally. According to a 2015 study by the Mississippi Department of Corrections, there is

a 35.9% recidivism rate for released prisoners. An estimated 17.6% of released prisoners in Mississippi will return to prison within the first year after release. Of the 7,080 prisoners released in 2016, it is expected that 2,541 will return to prison, 1,246 of them within the first year.

**Table IV.40**  
Admitted and released prisoners under jurisdiction  
of state or federal correctional authorities

State of Mississippi  
BJS 2015-2016

Persons	Admissions			Releases				
	2015 Total	2016 Total	% Change	2015 Total	2016 Total	% Change	2016 unconditional	2016 conditional
Mississippi	6,461	7,501	16.2%	6,104	7,080	16.0%	566	6,443
U.S. Total	608,318	606,000	-0.4%	641,027	626,024	-2.3%	168,752	426,755

### Transition-Age Youth in Foster Care

According to the Child Welfare Financing Survey, in 2015 Mississippi had 1,062 transition-age youth (16-21) in foster care. 81 youth were emancipated or aged-out of the foster care system in Mississippi in 2015.

**Table IV.41**  
Transition-age youth in foster care

State of Mississippi  
Child Welfare Financing Survey

Year	16 Yr. Old	17 Yr. Old	18 Yr. Old	19 Yr. Old	20-21 Yr. Old	Total # of youth
2011	313	391	257	101	56	1,118
2012	331	287	298	121	66	1,103
2013	293	314	230	125	84	1,045
2014	357	325	238	97	76	1,083
2015	340	329	244	74	74	1,062

Of the 1,062 transition-age youth in foster care, 29% had been in foster care for 3 or more years, and 23% had exited and re-entered foster care. The median age of entry into foster care for these transition-age youth is 15 years old.

**Table IV.42**  
Number of placements for transition-age youth

State of Mississippi  
Child Welfare Financing Survey

Number of Placements	1 or 2	3 or 4	5 or more
Mississippi	36%	24%	41%
U.S.	45%	21%	33%

In the foster care system, a placement is considered any place the child has lived, excluding trial home visits. In Mississippi, transition-age youth tend to have more placements during their time in foster care than the U.S. average. 36% had only one or two placements in 2015, below the U.S. average of 45 percent, while 24% had three or four placements, and 41% of transition-age youth in Mississippi had 5 or more placements, which is above the U.S. average of 33 percent in 2015.

The National Youth in Transition Database issues a survey and follow up surveys to cohorts of youth at ages 17, 19, and 21 as they transition out of the foster care system.<sup>2</sup> In 2017 the survey found that by the age of 17, 17% of foster care youth had experienced homelessness at some point in their life. In addition, by the age of 19, 20% of those same youth reported experiencing homelessness at some point in the past two years. The survey also found that at age 17, 33% of transition-age youth had been incarcerated at some point in their life, and by age 19, 20% had been incarcerated in the past two years.

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<sup>2</sup> <https://www.acf.hhs.gov/cb/research-data-technology/reporting-systems/nytd>

## C. SEGREGATION AND INTEGRATION

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

### ***A Technical Note on the Dissimilarity Index Methodology***

The dissimilarity indices included in this study were calculated from data provided by the Census Bureau according to the following formula:

$$D_j^{WB} = 100 * \frac{1}{2} \sum_{i=1}^N \left| \frac{W_i}{W_j} - \frac{B_i}{B_j} \right|$$

Where  $i$  indexes a geographic unit,  $j$  is the  $j^{\text{th}}$  jurisdiction,  $W$  is group one and  $B$  is group two, and  $N$  is the number of geographic units, starting with  $i$ , in jurisdiction  $j$ .<sup>3</sup>

This is the formula that HUD uses to calculate dissimilarity index<sup>4</sup> values. In most respects (including the use of tract-level data available through the Brown Longitudinal Tract Database), the methodology employed in this study exactly duplicates HUD’s methodology for calculating the index of dissimilarity. This index is used by HUD to measure the level of segregation in an area.

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

The principle exception was the decision to use Census tract-level data to calculate dissimilarity index values through 2010. While HUD uses tract level data in 1990 and 2000, HUD uses block group-level data in 2010. The decision to use tract-level data in all years included in this study was motivated by the fact that the dissimilarity index is sensitive to the geographic base unit from which it is calculated. Concretely, use of smaller geographic units produces dissimilarity index values that tend to be higher than those calculated from larger geographic units.<sup>5</sup>

<sup>3</sup> Affirmatively Furthering Fair Housing Data Documentation. HUD. December 2015.

<sup>4</sup> A demographic measure of the evenness with which two groups are distributed across component geographic areas that make up a larger area.

<sup>5</sup> Wong, David S. “Spatial Decomposition of Segregation Indices: A Framework Toward Measuring Segregation at Multiple Levels.” *Geographical Analyses*, 35:3. The Ohio State University. July 2003. P. 179.

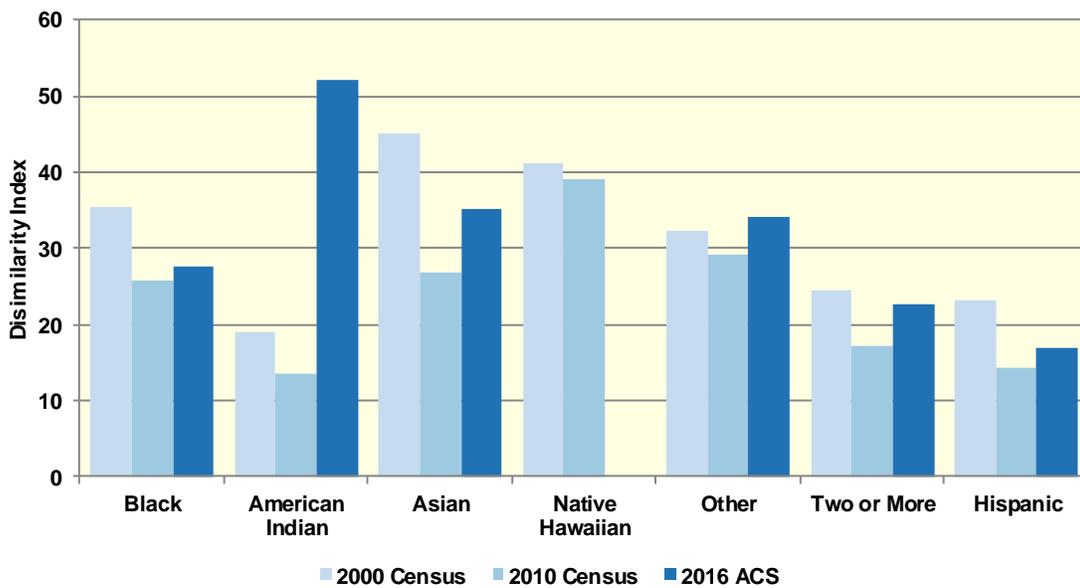
As a general rule, HUD considers the thresholds appearing in Table IV.43 to indicate low, moderate, and high levels of segregation:

Table IV.43 Interpreting the dissimilarity index		
Measure	Values	Description
Dissimilarity Index [range 0-100]	<40	Low Segregation
	40-54	Moderate Segregation
	>55	High Segregation

### Segregation Levels

Diagram IV.7 shows the dissimilarity index by racial type in 2000, 2010, and 2016. Any racial or ethnic group with a dissimilarity index rating between 40 and 54 has a moderate level of segregation. Any racial or ethnic group with a dissimilarity index rating 55 or above has a high level of segregation. American Indian households have a moderate level of segregation.

**Diagram IV.7**  
**Dissimilarity Index**  
City of Biloxi



## D. RACIALLY AND ETHNICALLY CONCENTRATED AREAS OF POVERTY

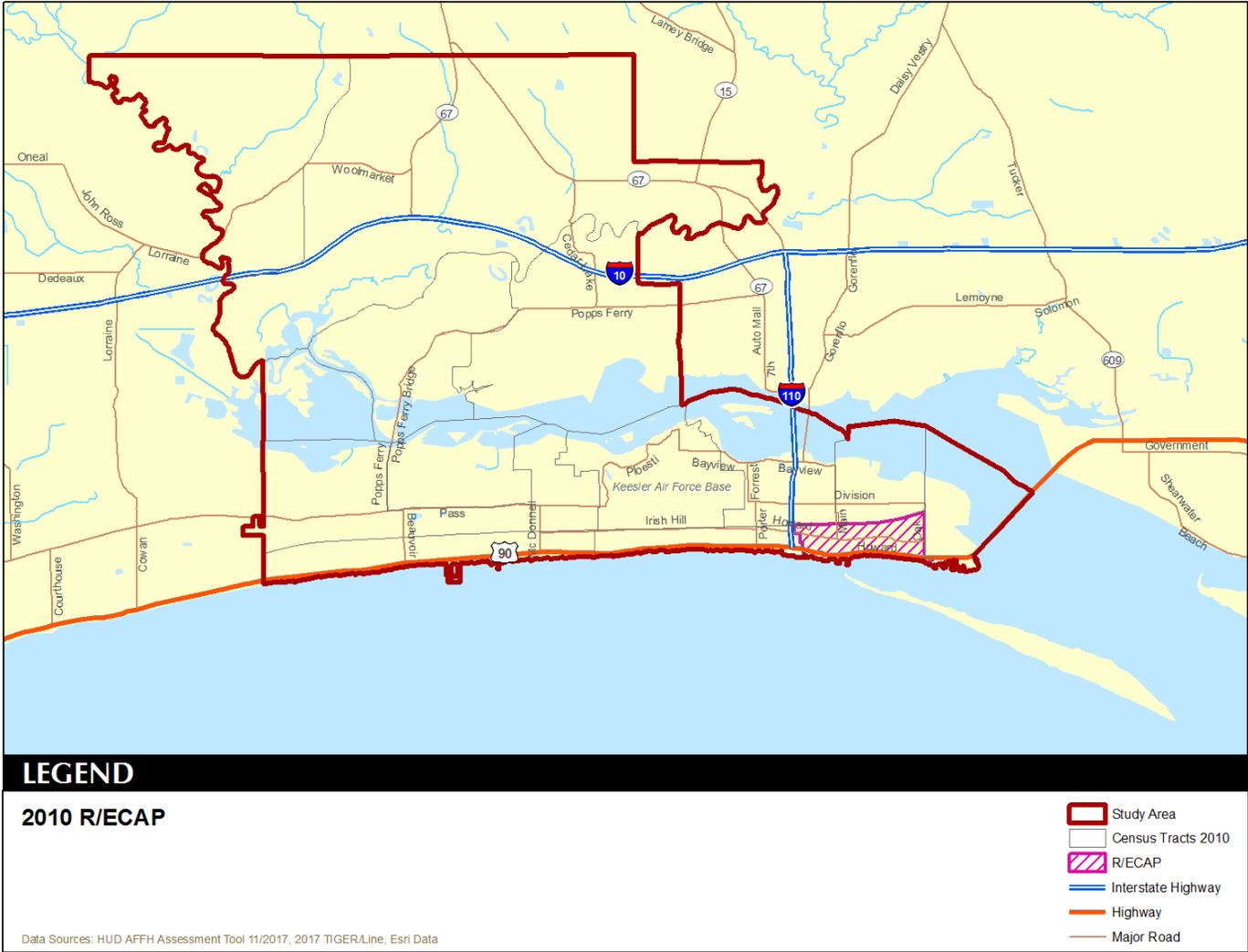
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Racially or ethnically concentrated areas of poverty (R/ECAPs) are Census tracts with relatively high concentrations of non-white residents living in poverty. Formally, an area is designated an R/ECAP if two conditions are satisfied: first, the non-white population, whether Hispanic or non-Hispanic, must account for at least 50% of the Census tract population. Second, the poverty rate in that Census tract must exceed a certain threshold of at least 40 percent.

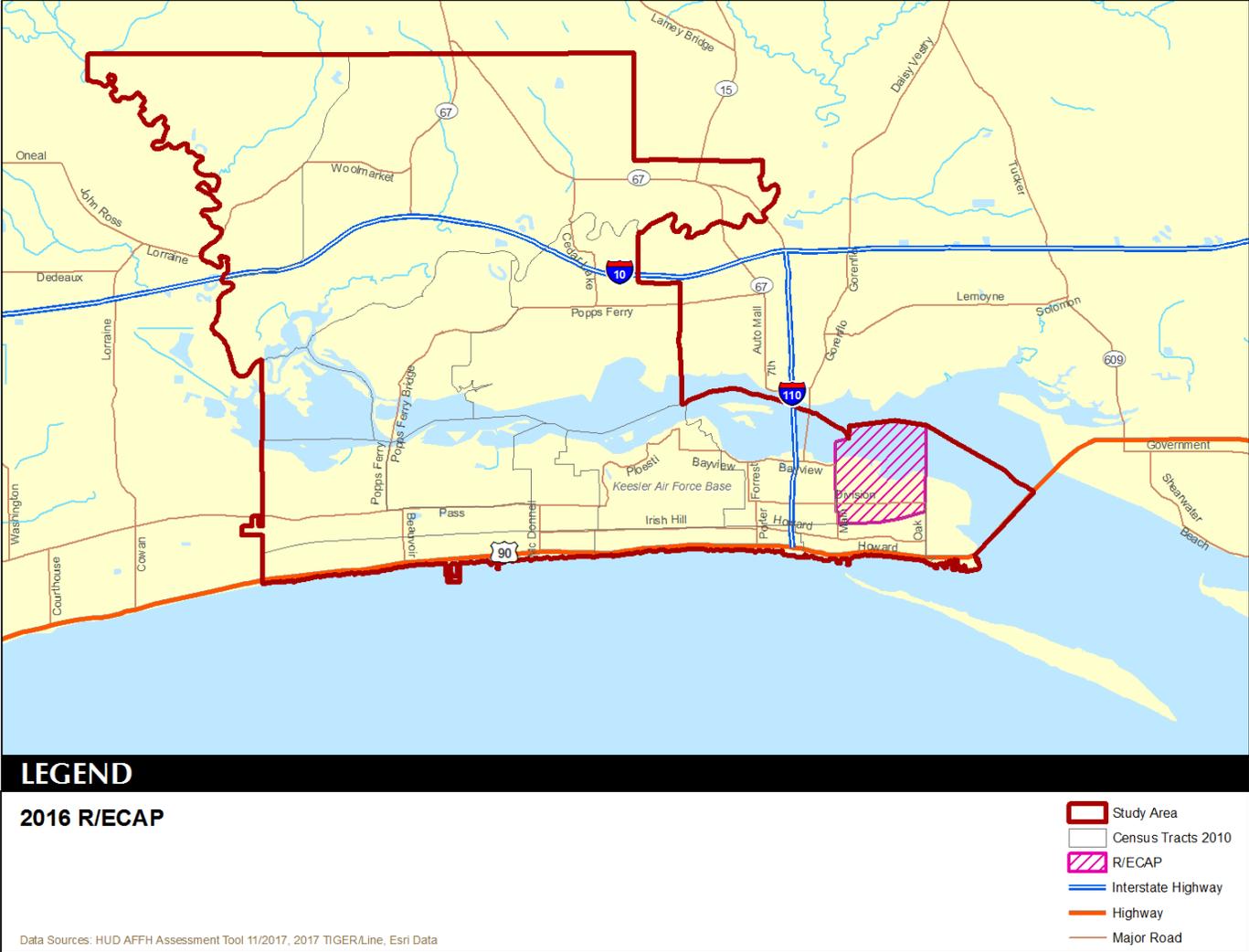
### ***R/ECAPs over Time***

The change in R/ECAPs in Biloxi is shown in the following maps. Map IV.1 shows the R/ECAPs in Biloxi in 2010, and Map IV.2 shows the R/ECAPs in 2016. There were no R/ECAPs in Biloxi in 2000. In 2010, there was one (1) R/ECAP. In 2016, there was also one (1) R/ECAP, located in the southeastern part of the City, the location of which shifted from 2010.

**Map IV.1**  
**R/ECAP 2010 Census**  
City of Biloxi  
AFFH Data



**Map IV.2**  
**R/ECAP 2016 ACS**  
City of Biloxi  
AFFH Data



## E. DISPARITIES IN ACCESS TO OPPORTUNITY

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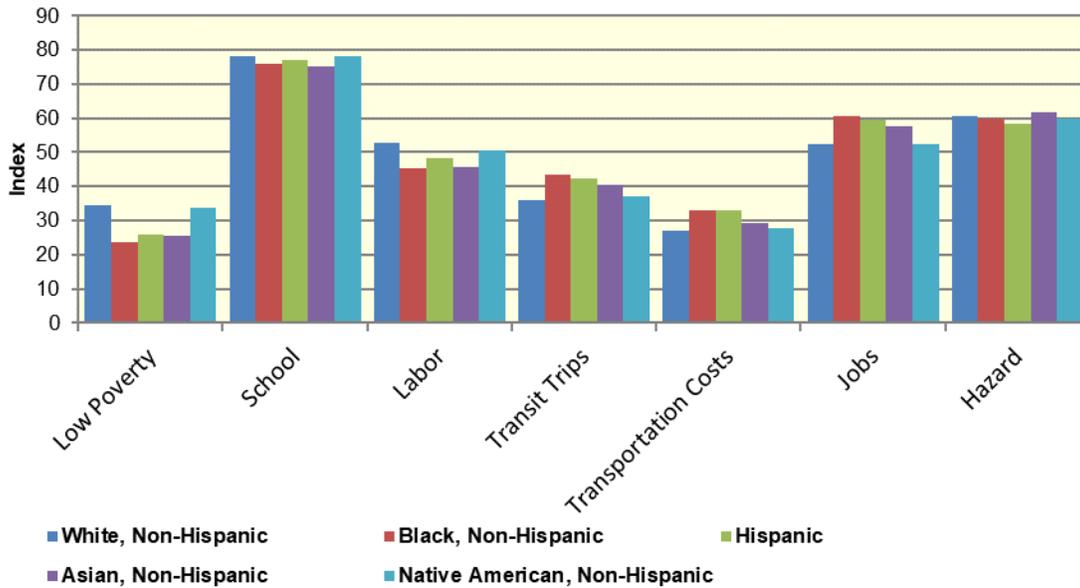
Areas of opportunity are physical places, areas within communities that provide things one needs to thrive, including quality employment, well performing schools, affordable housing, efficient public transportation, safe streets, essential services, adequate parks, and full-service grocery stores. Areas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

The HUD opportunity indices are Access to Low Poverty areas; Access to School Proficiency; Characterization of the Labor Market Engagement; Residence in relation to Jobs Proximity; Low Transportation Costs; Transit Trips Index; and a Characterization of where you live by an Environmental Health indicator. For each of these a more formal definition is as follows:

- Low Poverty – A measure of the degree of poverty in a neighborhood, at the Census Tract level.
- School Proficiency - School-level data on the performance of 4<sup>th</sup> grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing schools.
- Jobs Proximity - Quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a Core Based Statistical Area (CBSA)
- Labor Market Engagement - Provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood
- Low Transportation Costs – Estimates of transportation costs for a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters for the region
- Transit Trips - Trips taken by a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters
- Environmental Health - summarizes potential exposure to harmful toxins at a neighborhood level. This is also referred to as Environmental Hazard and labeled as Hazard in the following diagram.

All the indices are presented in Diagram IV.8. The disparities in access to opportunity are shown in the differences between the various racial and ethnic groups from the November 2017 HUD AFH dataset. For example, if white households have a distinctly higher index rating than black households then black households have a disproportionate access. Black households have markedly lower access to low poverty areas and labor market engagement.

**Diagram IV.8**  
**Access to Opportunity**  
 City of Biloxi

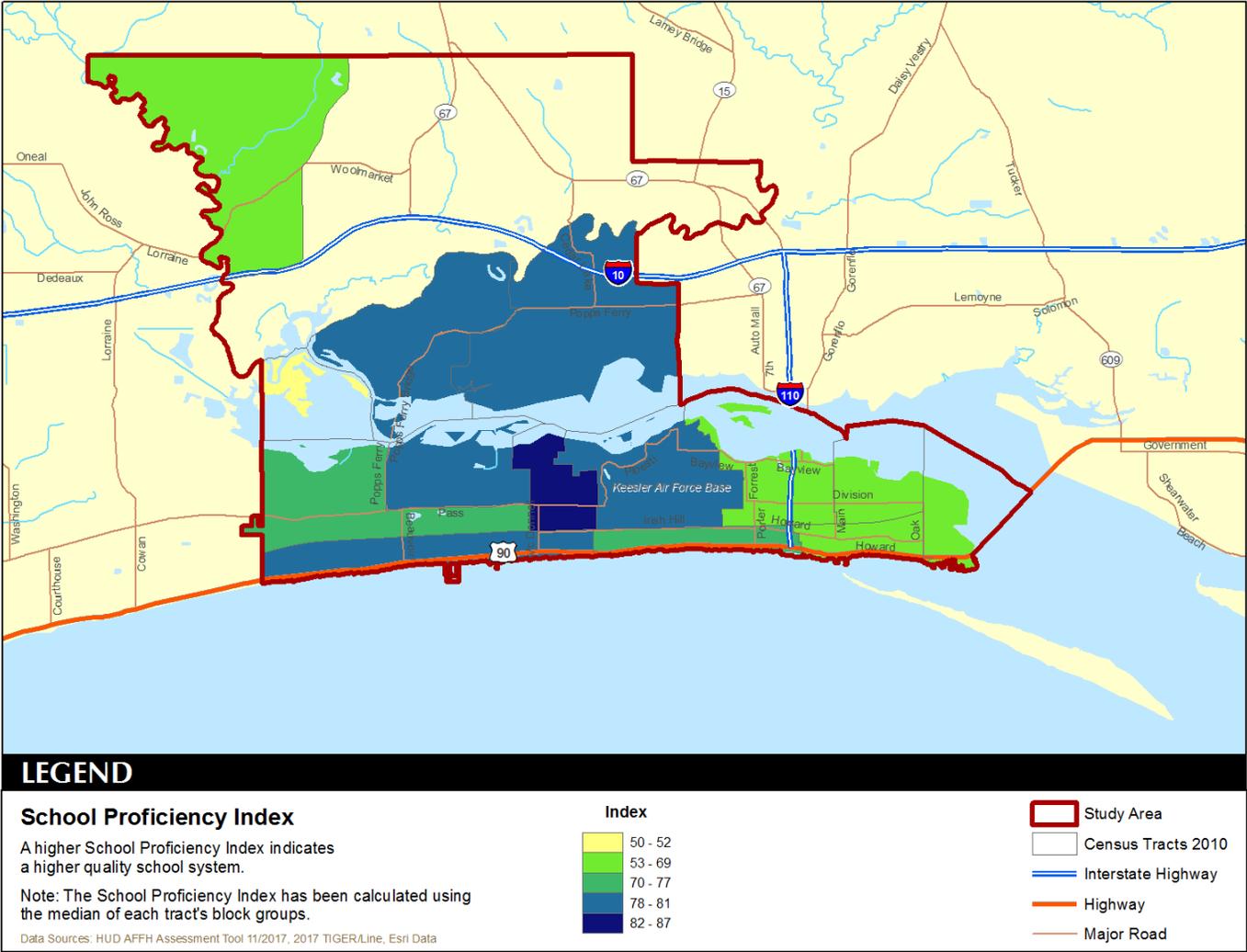


**EDUCATIONAL OPPORTUNITIES**

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

Map IV.3 shows the school proficiency index ratings in Biloxi. The darkest areas in Map IV.3 show the highest school proficiency areas, while the lightest yellow shows the lowest areas of school proficiency. There is little difference between racial and ethnic groups in school proficiency in Biloxi. However, areas in the northern and southcentral part of the City have the highest school proficiency ratings, according to HUD data. However, the entire city is within the same school district.

**Map IV.3**  
**School Proficiency Index**  
City of Biloxi  
AFFH Data



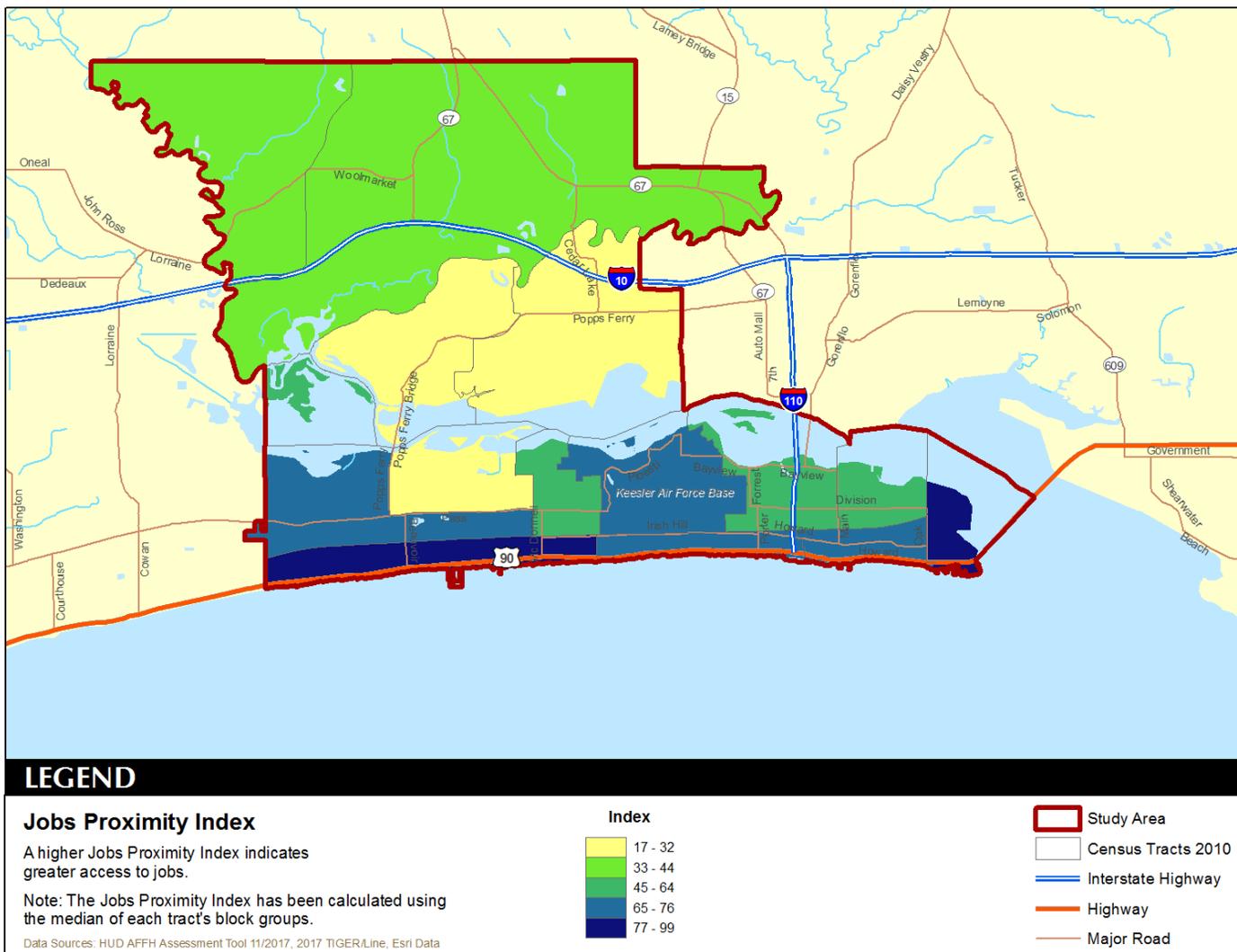
## EMPLOYMENT

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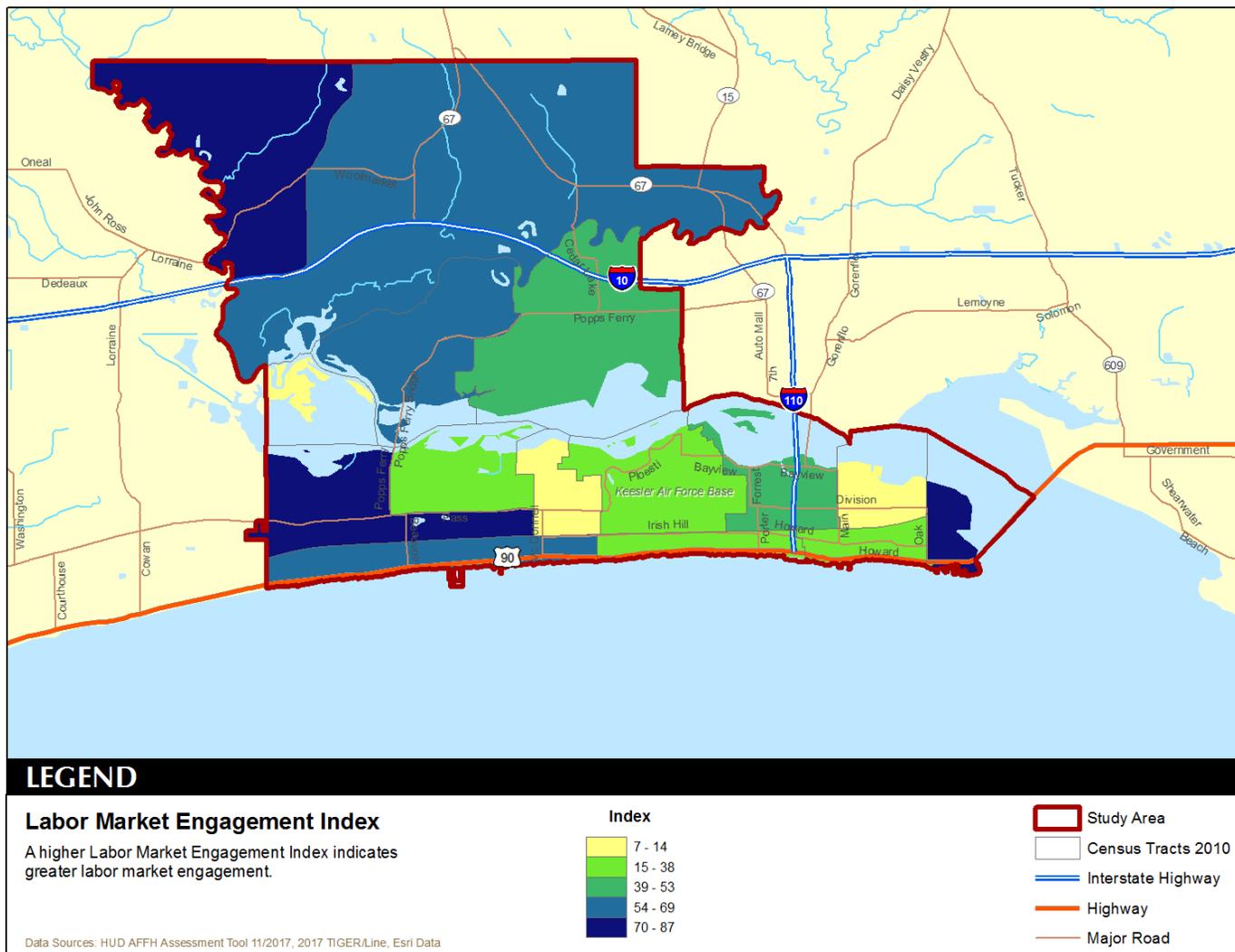
The Jobs Proximity Index measures the physical distances between place of residence and jobs by race/ethnicity and is shown in Map IV.4. Job proximity varies little by race and ethnicity, but the southern edge of the City has a higher job proximity rating than other areas, according to HUD data.

The Labor Market Engagement Index provides a measure of unemployment rate, labor-force participation rate, and percent of the population ages 25 and above with at least a bachelor's degree, by neighborhood. Map IV.5 shows the labor market engagement for the area. Labor Market Engagement is markedly lower for black and Asian households than for white households in Biloxi. As seen in Map IV.5, the highest rate of Labor Market Engagement is seen in the western and northern parts as of the City, as well as the southeastern edge.

**Map IV.4**  
**Job Proximity Index**  
 City of Biloxi  
 AFFH Data



**Map IV.5**  
**Labor Engagement Index**  
 City of Biloxi  
 AFFH Data



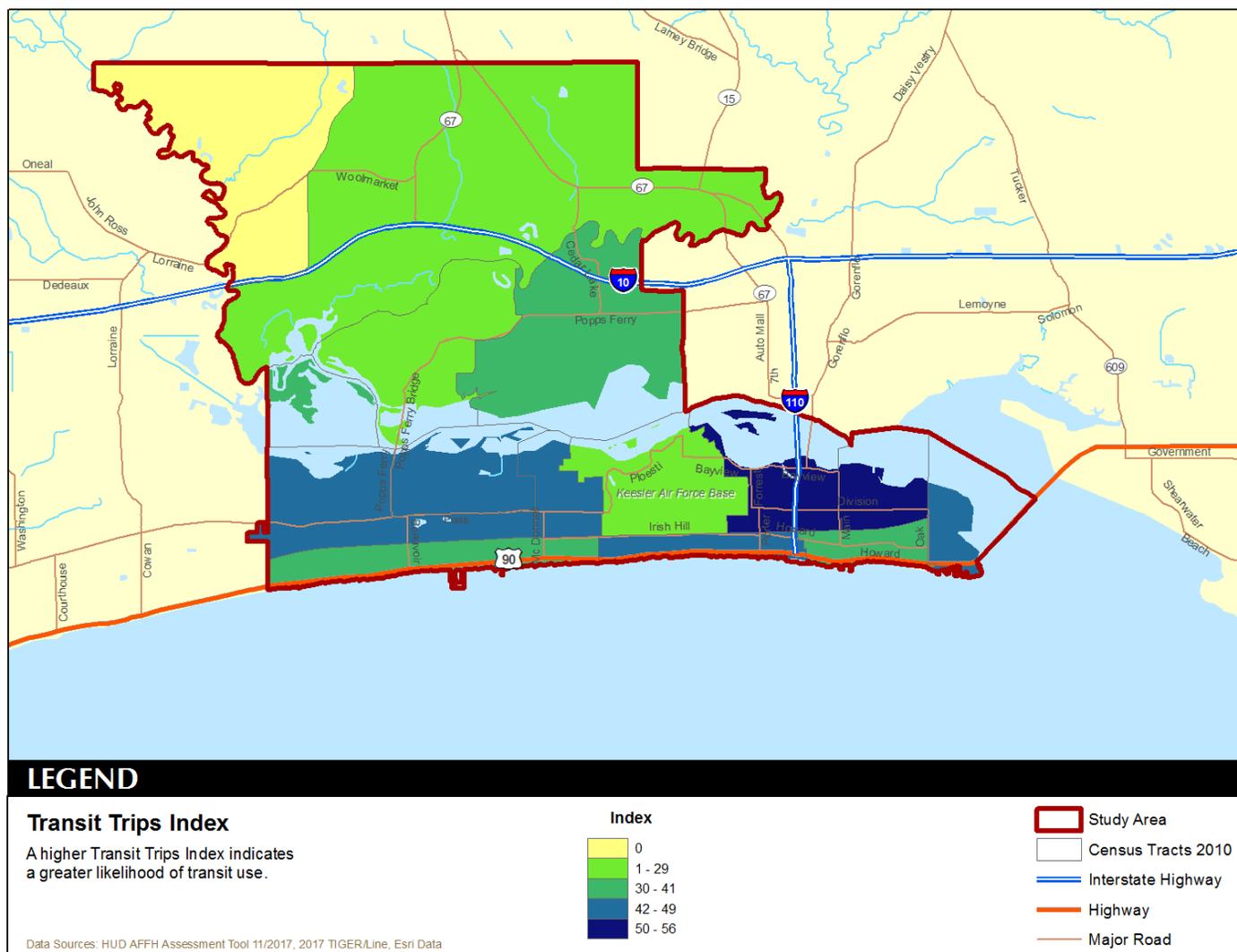
## TRANSPORTATION

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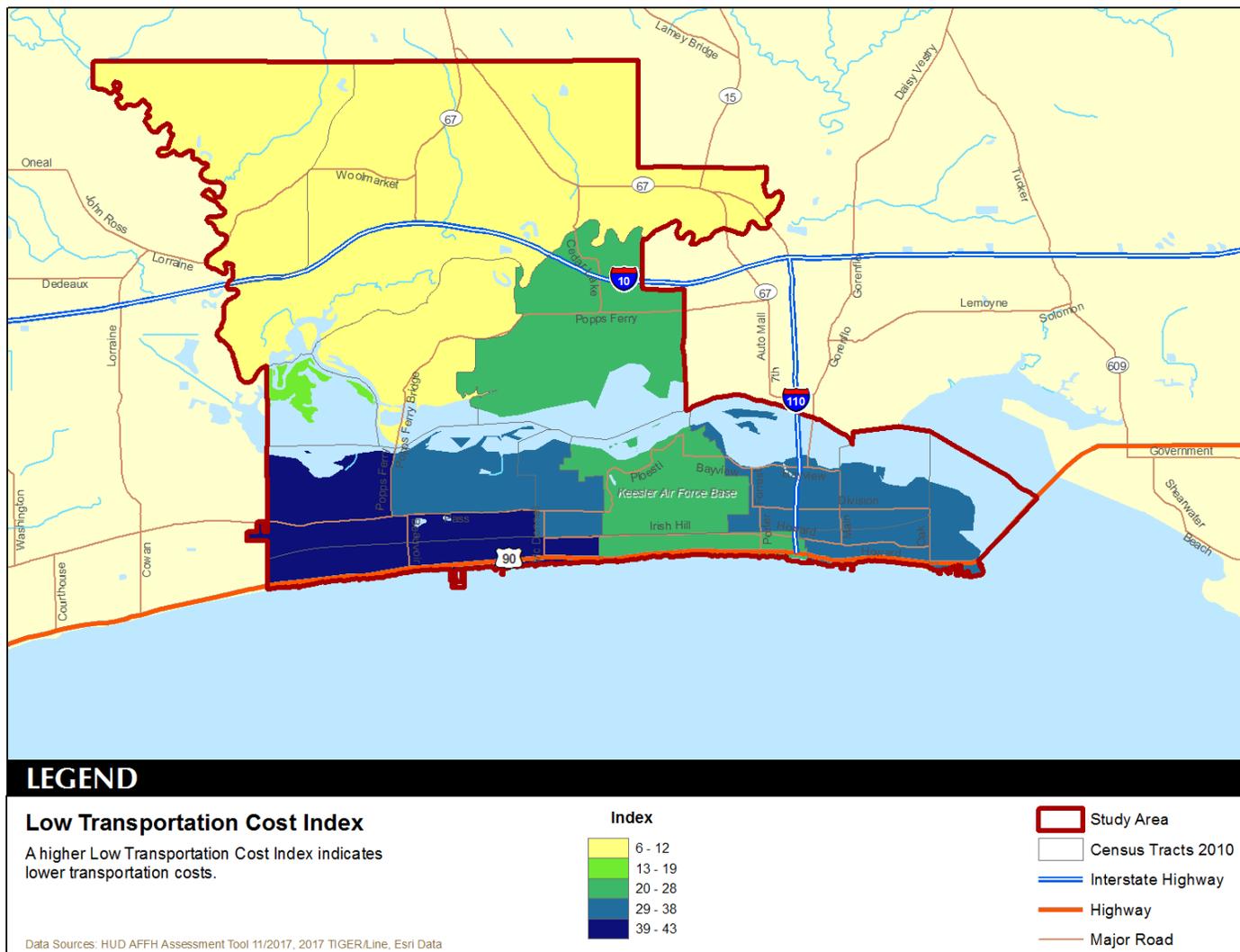
The Transit Trips Index measures proximity to public transportation by neighborhood. There was little difference in index rating across racial and ethnic groups. The Transit Trips Index measures how often low-income families in a neighborhood use public transportation. The Transit Trips Indices are shown in Map IV.6.

The Low Transportation Costs Index measures cost of transport and proximity to public transportation by neighborhood. Transportation Cost indices are shown in Map IV.7. According to City officials, there is an increased need for public transit services north of the Bay.

**Map IV.6**  
**Transit Trips Index**  
 City of Biloxi  
 AFFH Data



**Map IV.7**  
**Transportation Cost Index**  
 City of Biloxi  
 AFFH Data



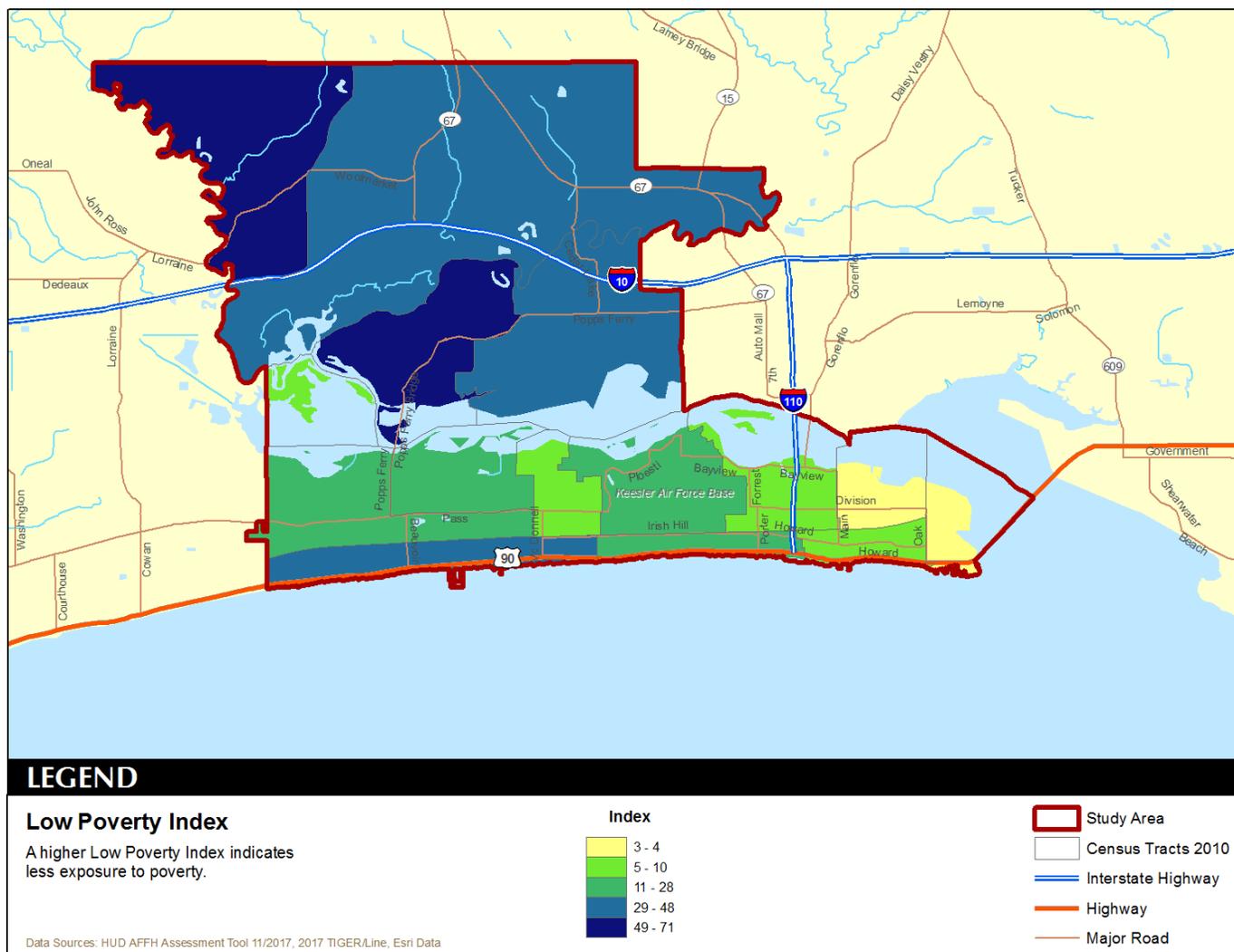
## LOW POVERTY EXPOSURE OPPORTUNITIES

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

The low poverty index is shown in Map IV.8. A higher index represents a lower level of exposure to poverty.

**Map IV.8**  
**Low Poverty Index**  
 City of Biloxi  
 AFFH Data

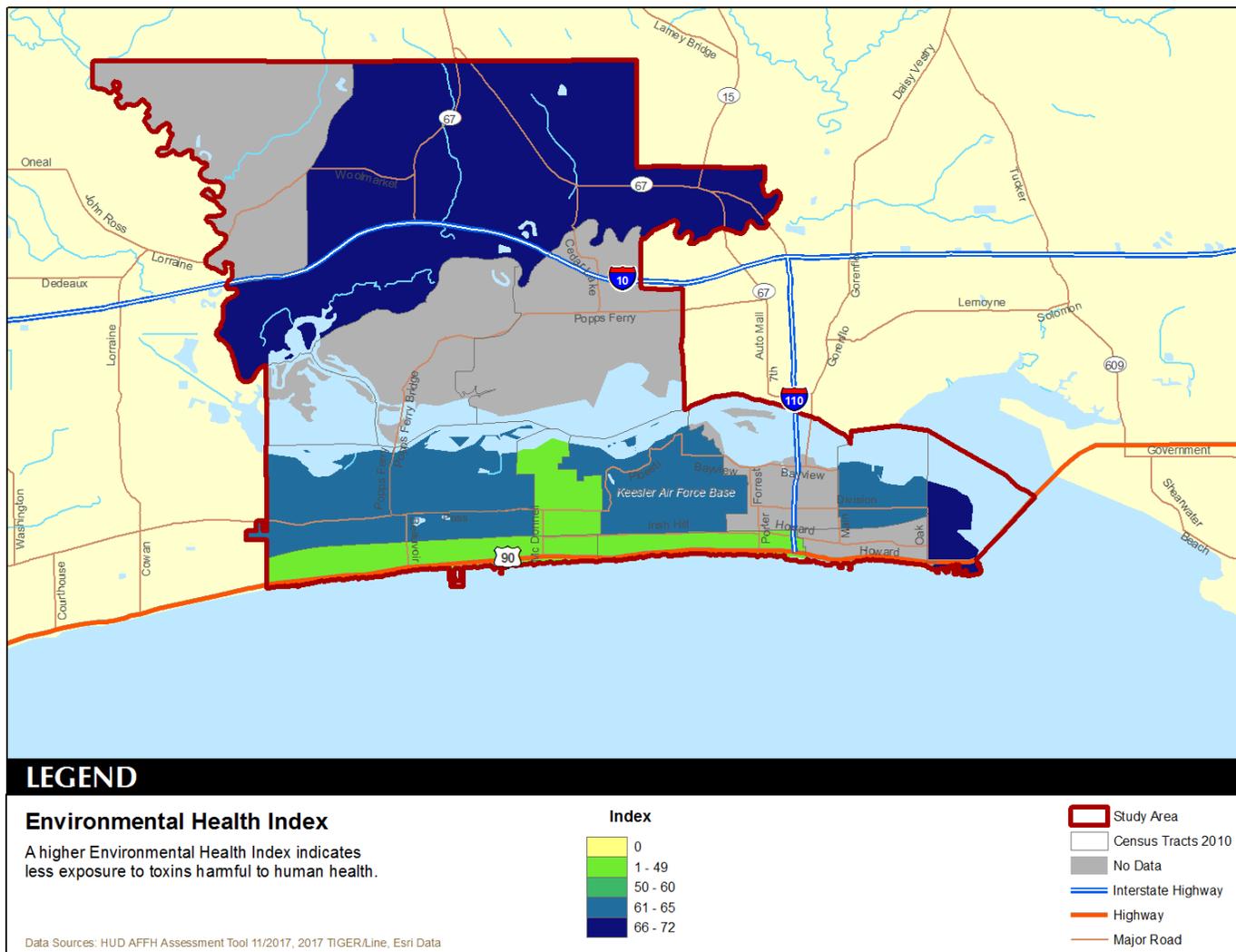


## **ACCESS TO ENVIRONMENTALLY HEALTHY NEIGHBORHOODS**

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The Environmental Health Index measures exposure based on EPA estimates of air quality carcinogenic, respiratory and neurological toxins by neighborhood. The Environmental Health Index is shown in Map IV.9.

**Map IV.9**  
**Environmental Health Index**  
 City of Biloxi  
 AFFH Data



## F. DISPROPORTIONATE HOUSING NEEDS

According to HUD, households are classified as having housing problems if they face overcrowding, incomplete plumbing or kitchen facilities, or cost burdens. This measure allows a jurisdiction to assess what proportion of the population may have unmet housing needs. Overcrowding is defined as having from 1.1 to 1.5 people per room per residence, with severe overcrowding defined as having more than 1.5 people per room. Households with overcrowding are shown in Table IV.44. In 2016, an estimated 2.8% of households in Biloxi were overcrowded, and an additional 1.1% were severely overcrowded.

Data Source	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
<b>Owner</b>							
2010 Five-Year ACS	9,660	98.8%	88	0.9%	25	0.3%	9,773
2016 Five-Year ACS	7,566	99.2%	35	0.5%	24	0.3%	7,625
<b>Renter</b>							
2010 Five-Year ACS	7,008	94.4%	371	5.0%	48	0.6%	7,427
2016 Five-Year ACS	9,419	93.6%	469	4.7%	172	1.7%	10,060
<b>Total</b>							
2010 Five-Year ACS	16,668	96.9%	459	2.7%	73	0.4%	17,200
2016 Five-Year ACS	16,985	96.0%	504	2.8%	196	1.1%	17,685

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

There was a total of 69 households with incomplete plumbing facilities in 2016, representing 0.4% of households in Biloxi. This is compared to 0.4% of households lacking complete plumbing facilities in 2000, and 0.8% in 2010.

Households	2000 Census	2010 Five-Year ACS	2016 Five-Year ACS
With Complete Plumbing Facilities	19,544	17,065	17,616
Lacking Complete Plumbing Facilities	75	135	69
<b>Total Households</b>	<b>19,619</b>	<b>17,200</b>	<b>17,685</b>
<b>Percent Lacking</b>	<b>0.4%</b>	<b>0.8%</b>	<b>0.4%</b>

There were 188 households lacking complete kitchen facilities in 2016, compared to 148 households in 2000 and 203 in 2010. This was a change from 0.8% of households in 2000 to 1.1% in 2016.

Households	2000 Census	2010 Five-Year ACS	2016 Five-Year ACS
With Complete Kitchen Facilities	19,471	16,997	17,497
Lacking Complete Kitchen Facilities	148	203	188
<b>Total Households</b>	<b>19,619</b>	<b>17,200</b>	<b>17,685</b>
<b>Percent Lacking</b>	<b>0.8%</b>	<b>1.2%</b>	<b>1.1%</b>

Cost burden is defined as gross housing costs that range from 30.0 to 50.0% of gross household income; severe cost burden is defined as gross housing costs that exceed 50.0% of gross household income. For homeowners, gross housing costs include property taxes, insurance, energy payments, water and sewer service, and refuse collection. If the homeowner has a mortgage, the determination also includes principal and interest payments on the mortgage loan. For renters, this figure represents monthly rent and selected electricity and natural gas energy charges.

In Biloxi, 19.7% of households in 2016 had a cost burden and 18.3% had a severe cost burden. Some 24.9% of renters were cost burdened in 2016, and 26.1% were cost burdened in 2010. Owner-occupied households without a mortgage had a cost burden rate of 5.5% and a severe cost burden rate of 6.4 percent in 2016. Owner occupied households with a mortgage had a cost burden rate of 20.4 percent, and severe cost burden at 11.5% in 2016.

Data Source	Less Than 30%		31%-50%		Above 50%		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	
<b>Owner with a Mortgage</b>									
2010 Five-Year ACS	3,841	68.1%	981	17.4%	822	14.6%	0	0.0%	5,644
2016 Five-Year ACS	2,543	66.1%	784	20.4%	441	11.5%	78	2.0%	3,846
<b>Owner Without a Mortgage</b>									
2010 Five-Year ACS	3,701	89.6%	236	5.7%	183	4.4%	9	0.2%	4,129
2016 Five-Year ACS	3,248	85.9%	206	5.5%	243	6.4%	82	2.2%	3,779
<b>Renter</b>									
2016 Five-Year ACS	3,459	46.6%	1,937	26.1%	1,285	17.3%	746	10.0%	7,427
2016 Five-Year ACS	4,513	44.9%	2,502	24.9%	2,549	25.3%	496	4.9%	10,060
<b>Total</b>									
2000 Census	11,001	64.0%	3,154	18.3%	2,290	13.3%	755	4.4%	17,200
2016 Five-Year ACS	10,304	58.3%	3,492	19.7%	3,233	18.3%	656	3.7%	17,685

### Housing Problems by Income

Table IV.48 shows the HUD calculated Median Family Income (MFI) for a family of four for Harrison County. As can be seen in 2017, the MFI was \$51,900 which compared to \$51,800 for the State of Mississippi.

<b>Table IV.48</b> <b>Median Family Income</b> Harrison County 2000–2017 HUD MFI		
Year	MFI	State
2000	\$40,500	\$38,100
2001	\$44,400	\$40,000
2002	\$44,400	\$40,200
2003	\$46,900	\$40,700
2004	\$46,900	\$40,700
2005	\$46,900	\$40,700
2006	\$46,800	\$40,700
2007	\$48,200	\$43,200
2008	\$49,000	\$45,000
2009	\$51,800	\$46,800
2010	\$52,500	\$47,300
2011	\$54,000	\$48,000
2012	\$54,800	\$48,700
2013	\$54,700	\$48,300
2014	\$51,100	\$48,200
2015	\$52,300	\$48,300
2016	\$51,100	\$48,900
2017	\$51,900	\$51,800

Table IV.49 shows Comprehensive Housing Affordability Strategy (CHAS) data for housing problems by tenure and income. As can be seen, there are a total of 955 owner-occupied and 2035 renter-occupied households with a cost burden of greater than 30% and less than 50 percent. An additional 735 owner-occupied and 2,179 renter-occupied households had a cost burden greater than 50% of income. According to CHAS Data, some 37.9% of the households in Biloxi have a housing problem. Overall there are 10,690 households without a housing problem in Harrison County. In total, an estimated 37.9% of the population has a housing problem.

**Table IV.49**  
**Housing Problems by Income and Tenure**  
 City of Biloxi  
 2010–2014 HUD CHAS Data

Housing Problem	Less Than 30% MFI	30% - 50% MFI	50% - 80% MFI	80% - 100% MFI	Greater than 100% MFI	Total
<b>Owner-Occupied</b>						
Lacking complete plumbing or kitchen facilities	0	0	0	0	10	10
Severely Overcrowded with > 1.51 people per room (and complete kitchen and plumbing)	0	0	0	25	15	40
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	75	4	4	45	10	138
Housing cost burden greater than 50% of income (and none of the above problems)	285	200	110	80	60	735
Housing cost burden greater than 30% but less than 50% of income (and none of the above problems)	60	110	240	140	405	955
Zero/negative income (and none of the above problems)	185	0	0	0	0	185
Has none of the 4 housing problems	50	245	600	510	4495	5900
<b>Total</b>	<b>655</b>	<b>559</b>	<b>954</b>	<b>800</b>	<b>4995</b>	<b>7963</b>
<b>Renter-Occupied</b>						
Lacking complete plumbing or kitchen facilities	25	60	30	10	10	135
Severely Overcrowded with > 1.51 people per room (and complete kitchen and plumbing)	0	20	80	25	10	135
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	240	45	70	15	0	370
Housing cost burden greater than 50% of income (and none of the above problems)	1035	555	575	4	10	2179
Housing cost burden greater than 30% but less than 50% of income (and none of the above problems)	205	465	885	225	255	2035
Zero/negative income (and none of the above problems)	145	0	0	0	0	145
Has none of the 4 housing problems	190	235	490	400	3475	4790
<b>Total</b>	<b>1840</b>	<b>1380</b>	<b>2130</b>	<b>679</b>	<b>3760</b>	<b>9789</b>
<b>Total</b>						
Lacking complete plumbing or kitchen facilities	25	60	30	10	20	145
Severely Overcrowded with > 1.51 people per room (and complete kitchen and plumbing)	0	20	80	50	25	175
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	315	49	74	60	10	508
Housing cost burden greater than 50% of income (and none of the above problems)	1320	755	685	84	70	2914
Housing cost burden greater than 30% but less than 50% of income (and none of the above problems)	265	575	1125	365	660	2990
Zero/negative income (and none of the above problems)	330	0	0	0	0	330
Has none of the 4 housing problems	240	480	1090	910	7970	10690
<b>Total</b>	<b>2495</b>	<b>1939</b>	<b>3084</b>	<b>1479</b>	<b>8755</b>	<b>17752</b>

## ACCESS TO MORTGAGE FINANCE SERVICES

Congress enacted the Home Mortgage Disclosure Act (HMDA) in 1975, permanently authorizing the law in 1988<sup>6</sup>. The Act requires both depository and non-depository lenders to collect and publicly disclose information about housing-related applications and loans. Under the HMDA, financial institutions are required to report the race, ethnicity, sex, loan amount, and income of mortgage applicants and borrowers by Census tract. Institutions must meet a set of reporting criteria. For depository institutions, these are as follows:

1. The institution must be a bank, credit union, or savings association;
2. The total assets must exceed the coverage threshold;<sup>7</sup>
3. The institution must have had a home or branch office in a Metropolitan Statistical Area (MSA);
4. The institution must have originated or refinanced at least one home purchase loan secured by a first lien on a one- to four-family dwelling;
5. The institution must be federally insured or regulated; and
6. The mortgage loan must have been insured, guaranteed, or supplemented by a federal agency or intended for sale to Fannie Mae or Freddie Mac.

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

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

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

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

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

<sup>6</sup> Prior to that year, Congress had to periodically reauthorize the law.

<sup>7</sup> Each December, the Federal Reserve announces the threshold for the following year. The asset threshold may change from year to year based on changes in the Consumer Price Index for Urban Wage Earners and Clerical Workers.

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

Table IV.50 shows the purpose of loan by year for Biloxi from 2008 to 2017. As seen therein, there were over 15,002 loans during this time period, of these 5,786 were for home purchases. In 2017, there were 1,061 loans, of which 561 were for home purchases.

Purpose	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
Home Purchase	896	652	653	665	362	449	393	553	602	561	5,786
Home Improvement	249	174	152	91	62	50	55	50	83	63	1,029
Refinancing	986	1,424	1,206	976	857	789	415	541	556	437	8,187
<b>Total</b>	<b>2,131</b>	<b>2,250</b>	<b>2,011</b>	<b>1,732</b>	<b>1,281</b>	<b>1,288</b>	<b>863</b>	<b>1,144</b>	<b>1,241</b>	<b>1,061</b>	<b>15,002</b>

Table IV.51 shows the occupancy status for loan applicants. A vast majority of applicants were for owner-occupied units, accounting for 12,558 loans between 2008 and 2017, and for 907 in 2017 alone.

Status	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
Owner-Occupied	1,604	1,991	1,772	1,466	1,052	1,074	714	923	1,055	907	12,558
Not Owner-Occupied	521	256	239	264	229	206	148	220	186	153	2,422
Not Applicable	6.0	3.0	0.0	2.0	0.0	8.0	1.0	1.0	0.0	1.0	22
<b>Total</b>	<b>2,131</b>	<b>2,250</b>	<b>2,011</b>	<b>1,732</b>	<b>1,281</b>	<b>1,288</b>	<b>863</b>	<b>1,144</b>	<b>1,241</b>	<b>1,061</b>	<b>15,002</b>

Owner-occupied home purchase loan applications by loan types are shown in Table IV.52. Between 2008 and 2017, there were 2,043 home loan purchases that were conventional loans, 1,317 that were FHA insured, and 1,285 that were VA Guaranteed.

**Table IV.52**  
**Owner-Occupied Home Purchase Loan Applications by Loan Type**  
 City of Biloxi  
 2008–2017 HMDA Data

Loan Type	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
Conventional	260	211	222	201	133	178	153	225	245	215	2,043
FHA - Insured	142	180	169	154	91	104	83	131	136	127	1,317
VA - Guaranteed	126	151	162	181	71	113	105	98	132	146	1,285
Rural Housing Service or Farm Service Agency	33	16	34	44	2	1	4	1	4	3	142
<b>Total</b>	<b>561</b>	<b>558</b>	<b>587</b>	<b>580</b>	<b>297</b>	<b>396</b>	<b>345</b>	<b>455</b>	<b>517</b>	<b>517</b>	<b>4,787</b>

## Denial Rates

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

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

As shown in Table IV.53, just over 2,463 home purchase loan applications were originated over the 2008-2017 period, and 469 were denied.

**Table IV.53**  
**Loan Applications by Action Taken**  
 City of Biloxi  
 2008–2017 HMDA Data

Action	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
Loan Originated	254	251	290	267	142	190	200	264	296	309	2,463
Application Approved but not Accepted	13	17.0	14.0	17.0	5.0	13.0	6.0	14.0	13.0	12.0	124
Application Denied	64	65	54	47	23	50	29	46	49	42	469
Application Withdrawn by Applicant	61	51	55	27	33	24	28	43	62	50	434
File Closed for Incompleteness	12.0	11.0	5.0	4.0	0.0	6.0	1.0	2.0	9.0	5.0	55
Loan Purchased by the Institution	157	163	169	218	94	113	81	86	88	73	1,242
Preapproval Request Denied	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Preapproval Approved but not Accepted	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total</b>	<b>561</b>	<b>558</b>	<b>587</b>	<b>580</b>	<b>297</b>	<b>396</b>	<b>345</b>	<b>455</b>	<b>517</b>	<b>491</b>	<b>4,787</b>

The most common reasons cited in the decision to deny one of these loan applications are shown in Table IV.54. Debt-to-income ratio accounted for 97 denials, credit history accounted for 103, and collateral accounted for 62 during the 2008 – 2017 period.

Denial Reason	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
Debt-to-Income Ratio	9.0	14.0	10.0	9.0	7.0	9.0	8.0	9.0	12.0	10.0	97
Employment History	2.0	1.0	1.0	1.0	0.0	1.0	0.0	0.0	0.0	0.0	6.0
Credit History	14	14	15	10	6	11.0	5.0	14.0	10.0	4.0	103
Collateral	8.0	5.0	7.0	6.0	2.0	6.0	3.0	4.0	8.0	13.0	62
Insufficient Cash	2.0	3.0	1.0	1.0	0.0	2.0	3.0	1.0	4.0	0.0	17.0
Unverifiable Information	5.0	0.0	1.0	4.0	1.0	1.0	1.0	0.0	2.0	3.0	18.0
Credit Application Incomplete	5.0	4.0	2.0	6.0	1.0	6.0	1.0	5.0	0.0	7.0	37
Mortgage Insurance Denied	0.0	1.0	0.0	0.0	0.0	0.0	0.0	1.0	0.0	0.0	2.0
Other	4.0	4.0	5.0	2.0	2.0	1.0	1.0	2.0	3.0	1.0	25
Missing	15	19.0	12	8.0	4.0	13	7	10	10	4	102
<b>Total</b>	<b>64</b>	<b>65</b>	<b>54</b>	<b>47</b>	<b>23</b>	<b>50</b>	<b>29</b>	<b>46</b>	<b>49</b>	<b>42</b>	<b>469</b>

Denial rates were observed to differ by race and ethnicity, as shown in Table IV.55. While white applicants had a denial rate of 13.4% over the period from 2008 through 2017, black applicants had a denial rate of 27.9 percent. As for ethnicity, Hispanic applicants had a higher denial rate than non-Hispanic applicants, at 15.2% versus 20.4 percent.

Race/Ethnicity	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Average
American Indian	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Asian	28.0%	40.0%	37.5%	23.5%	28.6%	23.5%	17.6%	18.2%	22.2%	0.0%	25.2%
Black	23.1%	47.1%	25.5%	22.7%	16.7%	37.0%	27.8%	18.2%	25.8%	23.3%	27.9%
Pacific Islander	50.0%	0.0%	0.0%	0.0%	0.0%	66.7%	0.0%	0.0%	50.0%	0.0%	33.3%
White	18.1%	14.3%	12.2%	12.7%	13.1%	18.0%	10.2%	14.1%	11.8%	10.4%	13.4%
Not Available	33.3%	35.3%	21.7%	41.7%	12.5%	13.3%	28.6%	21.4%	26.7%	33.3%	27.0%
Not Applicable	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
<b>Average</b>	<b>20.1%</b>	<b>20.6%</b>	<b>15.7%</b>	<b>15.0%</b>	<b>13.9%</b>	<b>20.8%</b>	<b>12.7%</b>	<b>14.8%</b>	<b>14.2%</b>	<b>12.0%</b>	<b>16.0%</b>
Non-Hispanic	26.7%	12.5%	0.0%	20.0%	20.0%	40.0%	0.0%	23.1%	33.3%	13.3%	20.4%
Hispanic	20.1%	19.6%	15.0%	14.0%	13.7%	20.4%	12.8%	13.8%	12.6%	10.4%	15.2%

## Predatory Lending

Home loans are designated as “high-annual percentage rate” loans (HALs) where the annual percentage rate on the loan exceeds that of a comparable treasury instruments by at least three percentage points. As shown in Table IV.56, 2,463 loans between 2008 and 2017 were HALs, accounting for 2.4% of home loans made in Biloxi.

Loan Type	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
HAL	23	18	2.0	5.0	6.0	0.0	0.0	2.0	0.0	2.0	58

Other	231	233	288	262	136	190	200	262	296	307	2,405
<b>Total</b>	<b>254</b>	<b>251</b>	<b>290</b>	<b>267</b>	<b>142</b>	<b>190</b>	<b>200</b>	<b>264</b>	<b>296</b>	<b>309</b>	<b>2,463</b>
Percent HAL	9.1%	7.2%	0.7%	1.9%	4.2%	0.0%	0.0%	0.8%	0.0%	0.6%	2.4%

While white households experienced HAL rates at 2.5% between 2008 and 2017, black households had a rate of HALs at 4.7 percent.

<b>Table IV.57</b>											
<b>Rate of HALs Originated by Race/Ethnicity of Borrower</b>											
City of Biloxi											
2008–2017 HMDA Data											
<b>Race</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>Average</b>
American Indian	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Asian	5.6%	16.7%	0.0%	0.0%	20.0%	0.0%	0.0%	0.0%	0.0%	0.0%	4.0%
Black	20.0%	5.6%	0.0%	0.0%	20.0%	0.0%	0.0%	5.6%	0.0%	0.0%	4.7%
Pacific Islander	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
White	8.8%	7.2%	0.9%	2.2%	2.5%	0.0%	0.0%	0.4%	0.0%	0.8%	2.5%
Not Available	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Not Applicable	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
<b>Average</b>	<b>9.1%</b>	<b>7.2%</b>	<b>0.7%</b>	<b>1.9%</b>	<b>4.2%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.8%</b>	<b>0.0%</b>	<b>0.6%</b>	<b>2.4%</b>
Hispanic	18.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	3.3%
Non-Hispanic	9.1%	7.3%	0.7%	2.0%	4.5%	0.0%	0.0%	0.8%	0.0%	0.7%	2.6%

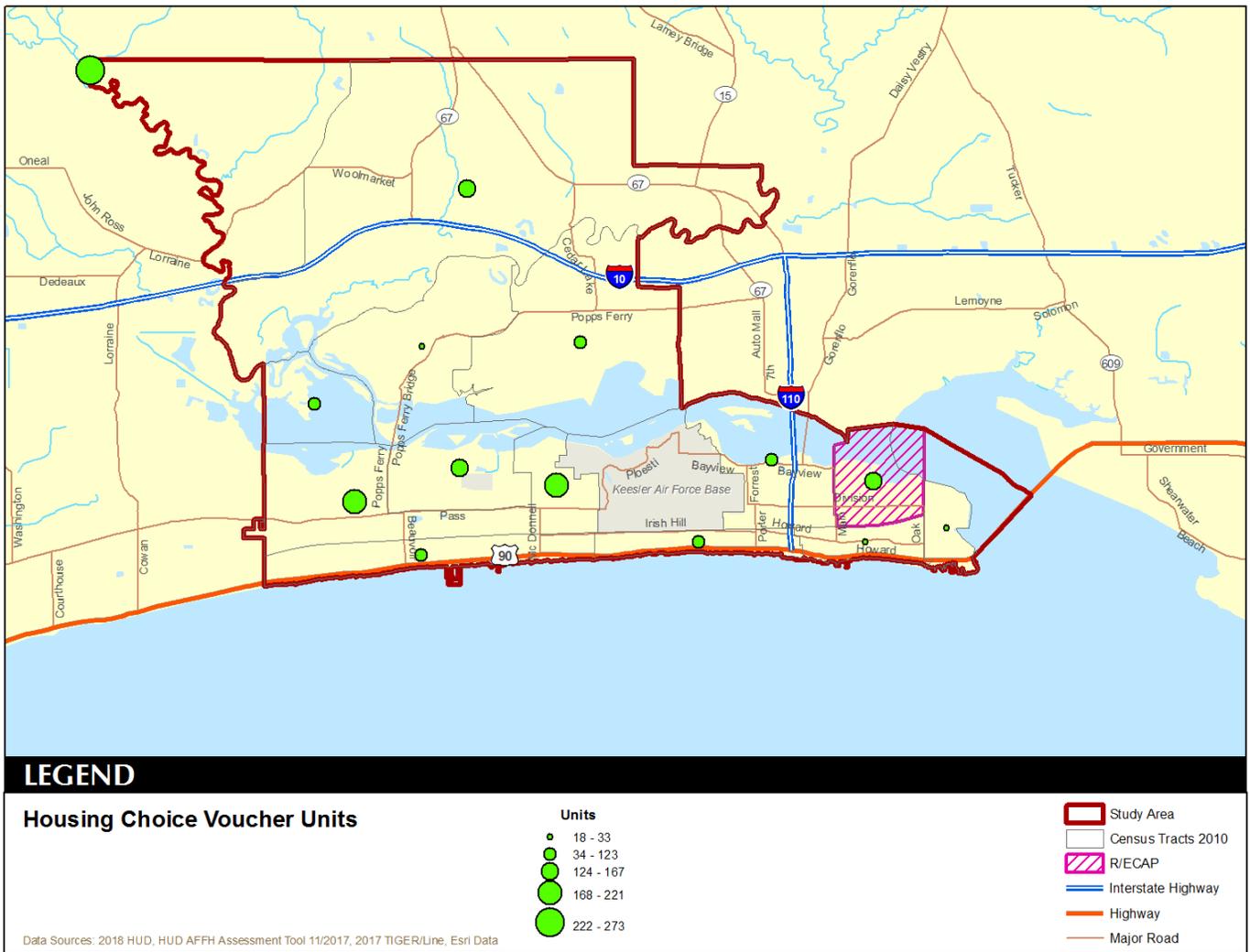
## G. PUBLICLY SUPPORTED HOUSING ANALYSIS

The number of public housing units is shown in Table IV.57, according to HUD's AFFH Database. There are 1,987 publicly assisted housing units in Biloxi, of which 302 are for households with disabilities. In total, there are 0 public housing units, 503 Project Based Section 8 units, 20 other HUD Multifamily units, and 1,464 Housing Choice Voucher units. This table and the maps on the following pages come from HUD's AFFH database. Biloxi Housing Authority has fully converted its portfolio to Rental Assistance Demonstration (RAD). Data in this section apparently includes units not owned, operated or managed by the Biloxi Housing Authority and therefore cannot be verified by the Biloxi Housing Authority.

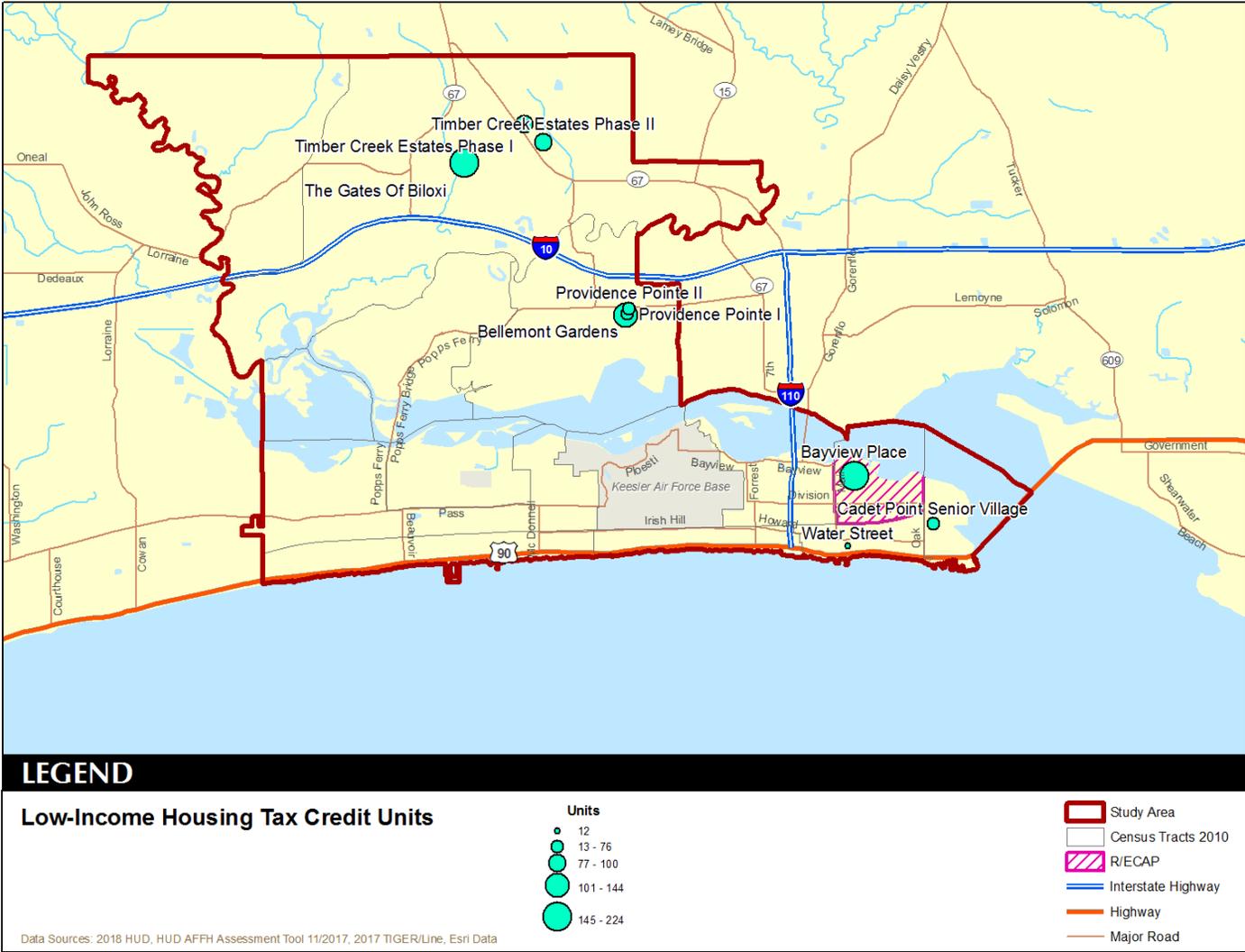
<b>Table IV.57</b> <b>Residents with Disabilities by Subsidized Housing Type</b> City of Biloxi HUD AFFH Raw Database		
<b>Program</b>	<b>Total Units</b>	<b>Total Disabled Units</b>
Public Housing	0	0
Project Based Section 8	503	21
Other HUD Multifamily	20	0.0
Housing Choice Vouchers	1,464	280
<b>Total</b>	<b>1,987</b>	<b>302</b>

Map IV.10 shows the location of Housing Choice Vouchers. Map IV.11 shows the location of Low-Income Housing Tax Credit (LIHTC) Units, Map IV.12 shows the location of Public Housing Units, and Map IV.13 shows the location of Project-Based Section 8 units.

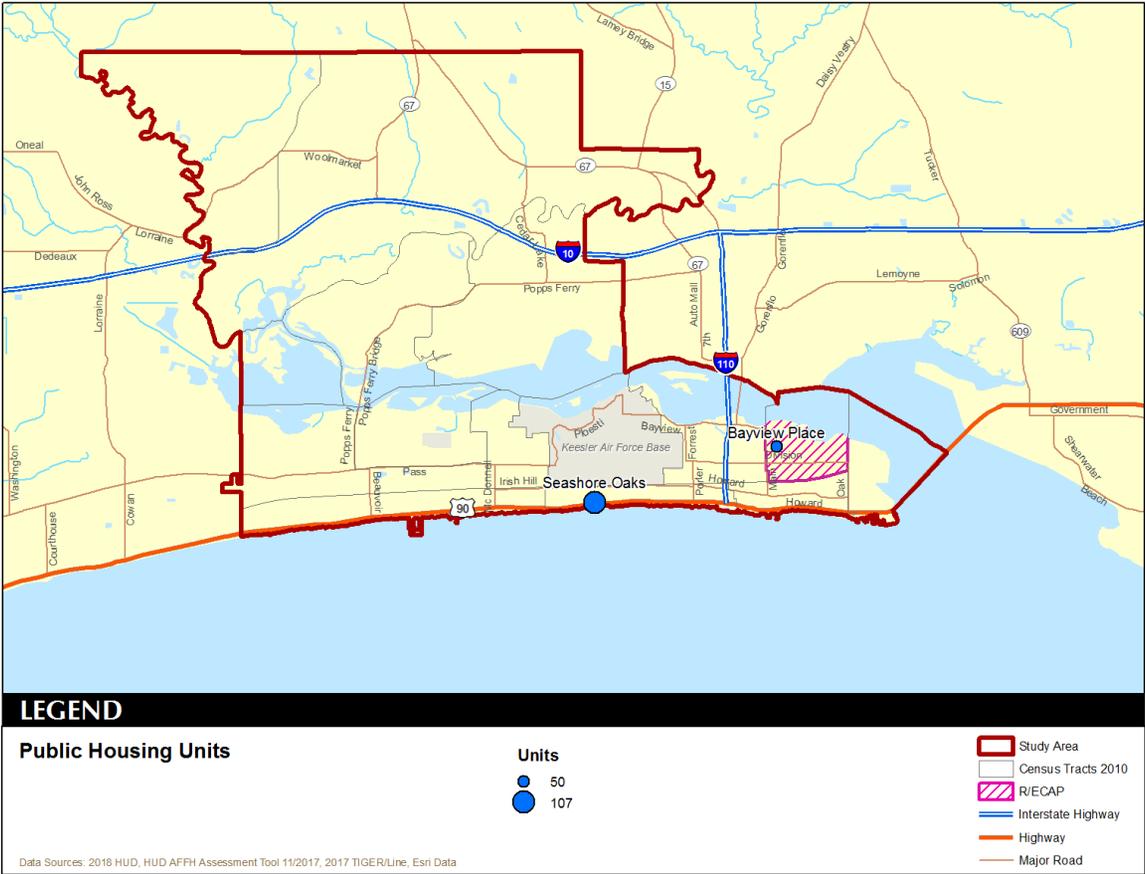
**Map IV.10**  
**Housing Choice Vouchers**  
 City of Biloxi  
 AFFH Data



**Map IV.11**  
**Low-Income Housing Tax Credit Units**  
 City of Biloxi  
 AFFH Data

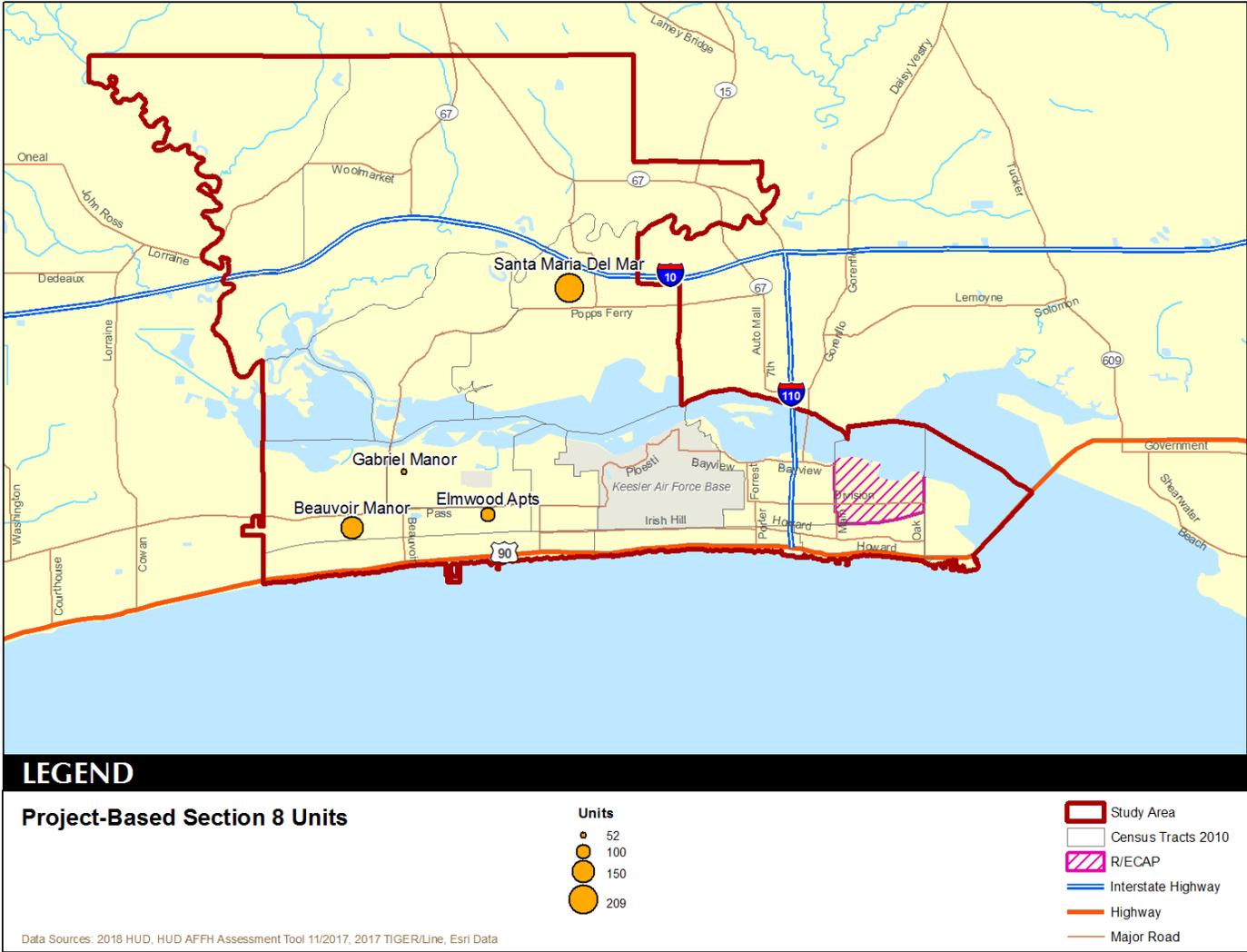


**Map IV.12**  
**Public Housing Units**  
City of Biloxi  
AFFH Data



NOTE: The Biloxi Housing Authority does not have any Public Housing Units as all have been converted to RAD. The information on this chart is not accurate.

**Map IV.13**  
**Project-Based Section 8 Units**  
City of Biloxi  
AFFH Data



Additional data is presented in the following tables about the Biloxi Housing Authority, which was provided by the Biloxi Housing Authority. The Housing Authority has a total of 1,743 assisted households.

<b>Table IV.58</b> <b>What is the total number of your assisted households, with vouchers, regular low-income housing, public housing, and other low-income housing you own?</b> Biloxi Housing Authority Public Housing Authority Survey	
<b>Total</b>	
1,743	

Of these assisted units, some 684 of the households are black, and 451 are white. There are 37 Hispanic households.

<b>Table IV.59</b> <b>Of your assisted households, how many of the head of households are:</b> Biloxi Housing Authority Public Housing Authority Survey	
<b>Race</b>	<b>Head of Households</b>
White	451
Black	684
American Indian/Native American	67
Asian	77
Native Hawaiian/Pacific Islander	9
Two or more races	0
Don't know	0
<b>Total</b>	<b>1,288</b>

<b>Table IV.60</b> <b>Of your assisted households, how many of the head of households are:</b> Biloxi Housing Authority Public Housing Authority Survey	
<b>Ethnicity</b>	<b>Head of Households</b>
Hispanic	37
Non-Hispanic	1,706
<b>Total</b>	<b>1,743</b>

There are 353 households that are considered to have one or more persons with a disability.

<b>Table IV.61</b> <b>How many households have one or more persons with disabilities?</b> Biloxi Housing Authority Public Housing Authority Survey	
Disabilities	Responses
One or more persons with disabilities	353

A majority of households have a female head of household, and 930 households have children present.

<b>Table IV.62</b> <b>How many of the head of households are:</b> Biloxi Housing Authority Public Housing Authority Survey	
Gender	Total
Male	367
Female	1,376
Female with one or more children in the home under the age of 18	839
Male with one or more children in the home under the age of 18	91
<b>Total</b>	<b>930</b>

The Housing Authority has 11 vacant one-bedroom units, 3 vacant two-bedroom units, and 9 vacant three-bedroom units. The number of vacant units provides a snapshot at a moment in time and may not reflect the actual number of units that do not have tenants, nor the number of units that are being made ready for incoming tenants.

<b>Table IV.63</b> <b>How many of your public housing units are:</b> Biloxi Housing Authority Public Housing Authority Survey		
Type of Unit	Owned	Vacant or soon to be empty and available for rent
Efficiency	0	3
One Bedroom	0	11
Two Bedroom	0	3
Three Bedroom	0	9
Four Bedroom	0	0
Five or more Bedroom	0	0
<b>Total Number of Units</b>	<b>0</b>	<b>26</b>

According to the Biloxi Housing Authority, the Housing Authority does not have an Affirmative Action Plan.

<b>Table IV.64</b> <b>Do you have an Affirmative Action Plan?</b> Biloxi Housing Authority Public Housing Authority Survey			
Yes	No	Don't Know	Missing
0	1	0	0

The Housing Authority does have admissions preferences or housing designations.

<b>Table IV.65</b> <b>Do you have an Admissions Preferences or Housing Designations?</b> Biloxi Housing Authority Public Housing Authority Survey			
Yes	No	Don't Know	Missing
1	0	0	0

<b>Table IV.66</b> <b>Do you have Voucher Mobility or Portability Policies and Practices?</b> Biloxi Housing Authority Public Housing Authority Survey			
Yes	No	Don't Know	Missing
1	0	0	0

Biloxi Housing Authority is not subject to a charge letter from HUD, a fair housing cause determination, or a claim under the False Claims Act.

<b>Table IV.67</b> <b>Is your PHA currently subject to any of the following:</b> Biloxi Housing Authority Public Housing Authority Survey				
	Yes	No	Don't Know	Missing
A charge or letter of finding from HUD concerning a violation of a civil rights related law	0	1	0	0
A cause determination for a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law	0	1	0	0
A letter of findings issued by a lawsuit file or joined by the Department of Justice alleging a pattern or practices or systematic violation of a fair housing or civil rights law	0	1	0	0
A claim under False Claims Acts related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing	0	1	0	0

## H. DISABILITY AND ACCESS

The following tables present data from the 2000 Census because the 2010 Census did not include detailed questions about disability. This information is supplemented with data from the 2016 Five-Year American Community Survey to provide more up-to-date information. The disability rate for the City of Biloxi from the 2000 Census is shown in Table IV.68. Some 25.5% of the population was disabled in 2000, or a total of 10,683 persons. The disability rate was highest for those over 65, with 50.5% disabled.

Age	Total	
	Disabled Population	Disability Rate
5 to 15	459	6.3%
16 to 64	7,246	25.3%
65 and older	2,978	50.5%
<b>Total</b>	<b>10,683</b>	<b>25.5%</b>

Table IV.69 shows disability by type in 2000. There were 4,869 physical disabilities reported in 2000, 4,622 employment disabilities, and 3,890 go-outside-home disabilities. The tally of disabilities, shown below, may total more than the total number of persons with disabilities due to the fact that one person may have one or more disabilities.

Disability Type	Population
Sensory disability	2,073
Physical disability	4,869
Mental disability	2,382
Self-care disability	1,436
Employment disability	4,622
Go-outside-home disability	3,890
<b>Total</b>	<b>19,272</b>

Disability by age, as estimated by the 2016 ACS, is shown in Table IV.70 on the following page. The disability rate for females was 14.5%, compared to 15.6% for males. The disability rate grew precipitously higher with age, with 55.6% of those over 75 experiencing a disability.

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	32	1.6%	0	0.0%	32	0.9%
5 to 17	308	9.1%	129	3.8%	437	6.4%
18 to 34	324	7.6%	371	7.9%	695	7.8%
35 to 64	1,448	17.4%	1,215	15.4%	2,663	16.4%
65 to 74	455	32.6%	349	23.9%	804	28.2%
75 or Older	660	52.9%	938	57.7%	1,598	55.6%
<b>Total</b>	<b>3,227</b>	<b>15.6%</b>	<b>3,002</b>	<b>14.5%</b>	<b>6,229</b>	<b>15.0%</b>

The number of disabilities by type, as estimated by the 2016 ACS, is shown in Table IV.71. There are 9.0% of persons that have an ambulatory disability, 7.6% have an independent living disability, and 3.1% have a self-care disability.

Disability Type	Population with Disability	Percent with Disability
Hearing disability	1,805	4.4%
Vision disability	1,458	3.5%
Cognitive disability	2,666	7.1%
Ambulatory disability	3,395	9.0%
Self-Care disability	1,160	3.1%
Independent living disability	2,335	7.6%
<b>Total</b>	<b>12,819</b>	<b>.</b>

#### DISABILITY AND ACCESS WORKGROUPS

Four (4) Disability and Access Workgroups were held between October and December 2018 to gather feedback on the needs of persons with disabilities and improving access to housing throughout the State of Mississippi. A summary of comments is included below, and a set of transcripts is included in the Appendix.

- Persons with disabilities tend to be congregated in urban areas in order to access public transit
- There is a lack of available accessible units, and a lack of new development of accessible units
- There is continued need for permanent supportive housing for persons with disabilities
- NIMBYism continues to be a challenge for construction or development of new units, especially group homes
- There should be a mandate that all new housing developments include a specified percentage of accessible units
- Significant need for public transportation options for persons with disabilities
- There is a need for integrated services beyond just housing

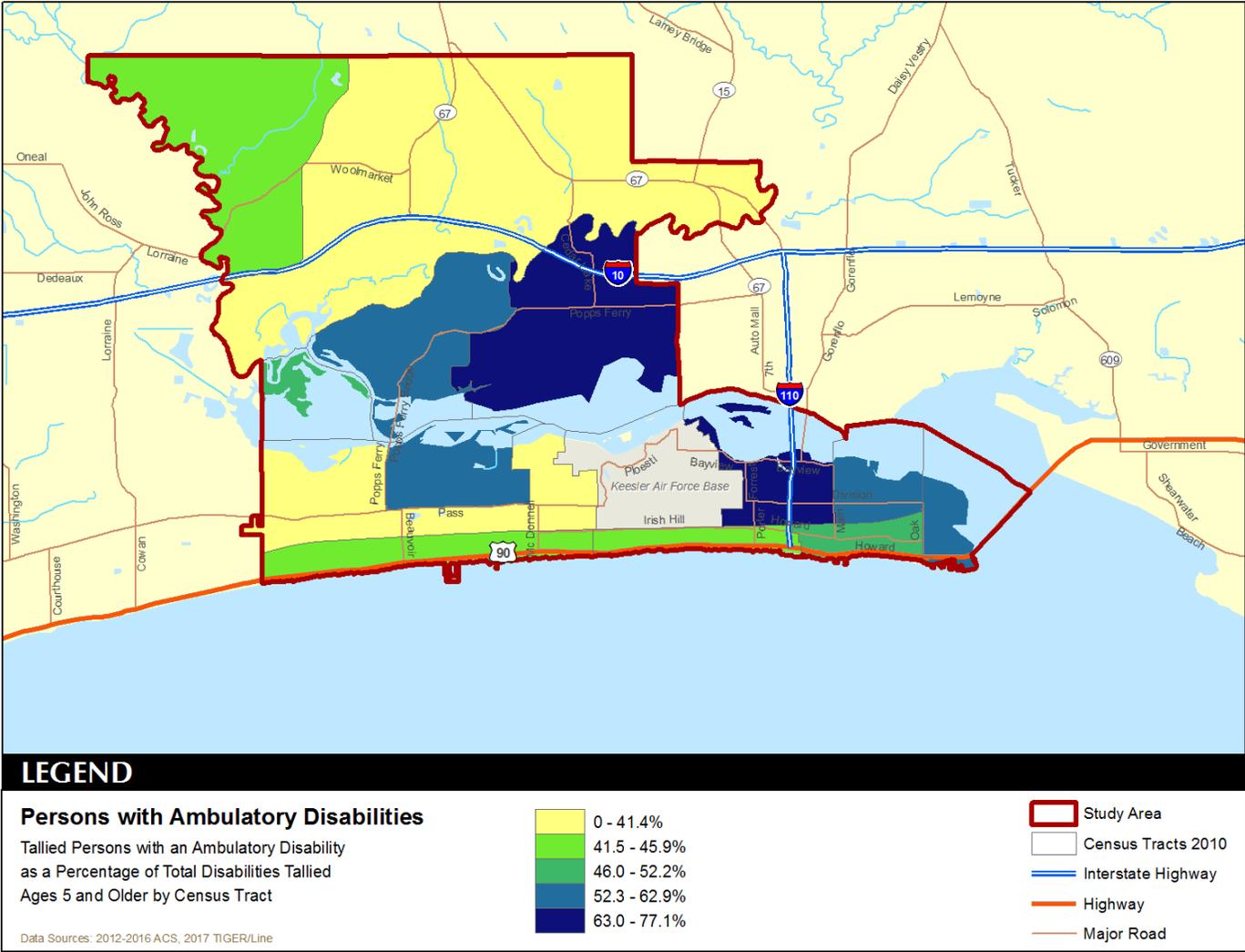
## HOUSING ACCESSIBILITY

Accessible housing units are located throughout the area. There are 302 publicly supported housing units available for households with disabilities, out of 1,987 total publicly supported housing units in Biloxi, according to HUD's AFFH database. The number of public housing units stating zero in Table IV.72 is due to the fact that Biloxi Housing Authority has converted its units to RAD. A brief summary of publicly-supported housing and assisted units in Biloxi is included in **Section IV.G Publicly Supported Housing Analysis**.

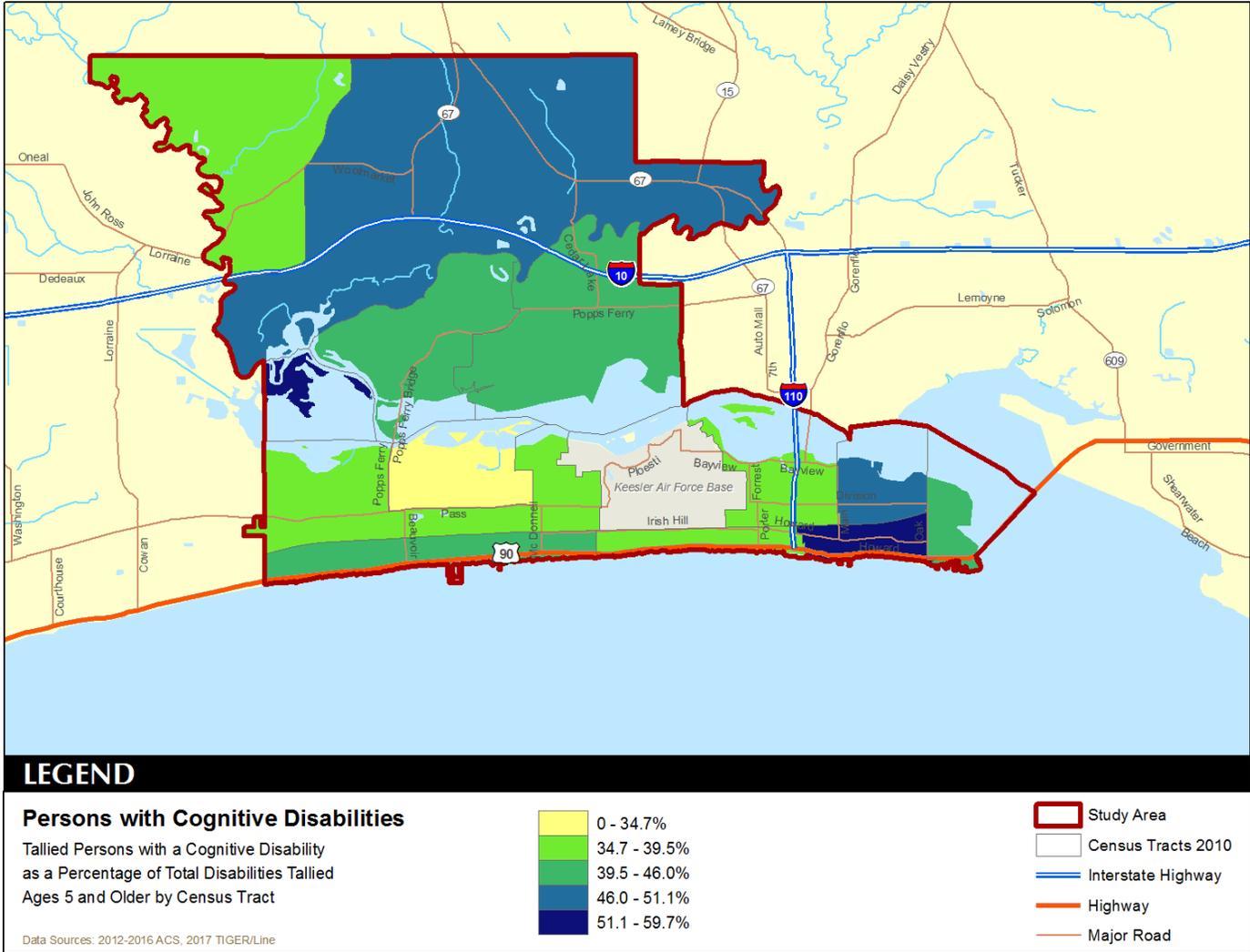
<b>Program</b>	<b>Total Units</b>	<b>Total Disabled Units</b>
Public Housing	0	0
Project Based Section 8	503	21
Other HUD Multifamily	20	0.0
Housing Choice Vouchers	1,464	280
<b>Total</b>	<b>1,987</b>	<b>302</b>

The concentrations of persons with various types of disabilities in Biloxi are shown in the following maps. Maps IV.14 through IV.19 show persons with ambulatory disabilities, persons with cognitive disabilities, persons with hearing disabilities, persons with independent living disabilities, persons with self-care disabilities, and persons with vision disabilities, according to 2016 ACS Data. These are shown as a percentage of total disabilities tallied in order to better show concentrations of certain disability types in the community.

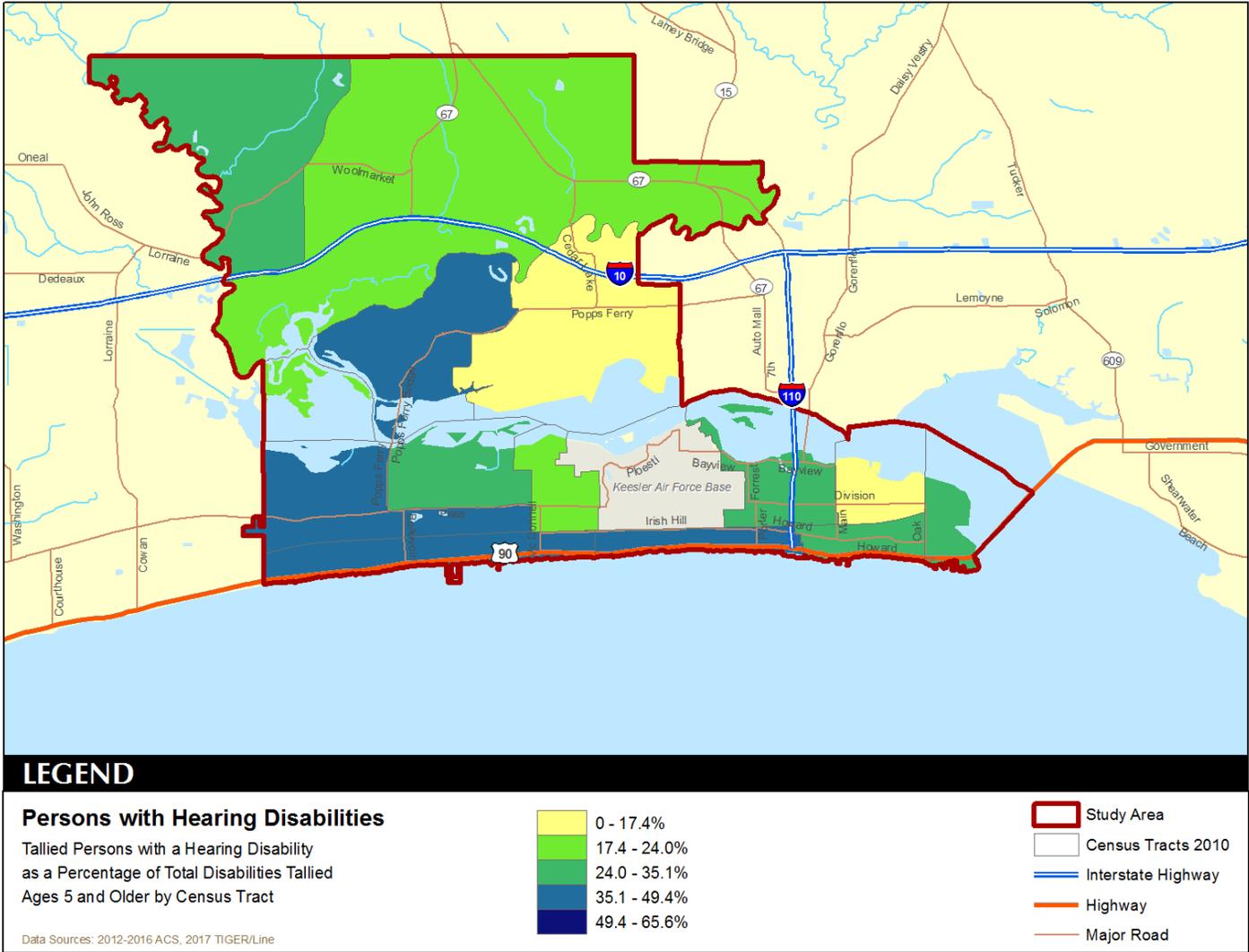
**Map IV.14**  
**Persons with Ambulatory Disabilities**  
 City of Biloxi  
 AFFH Data



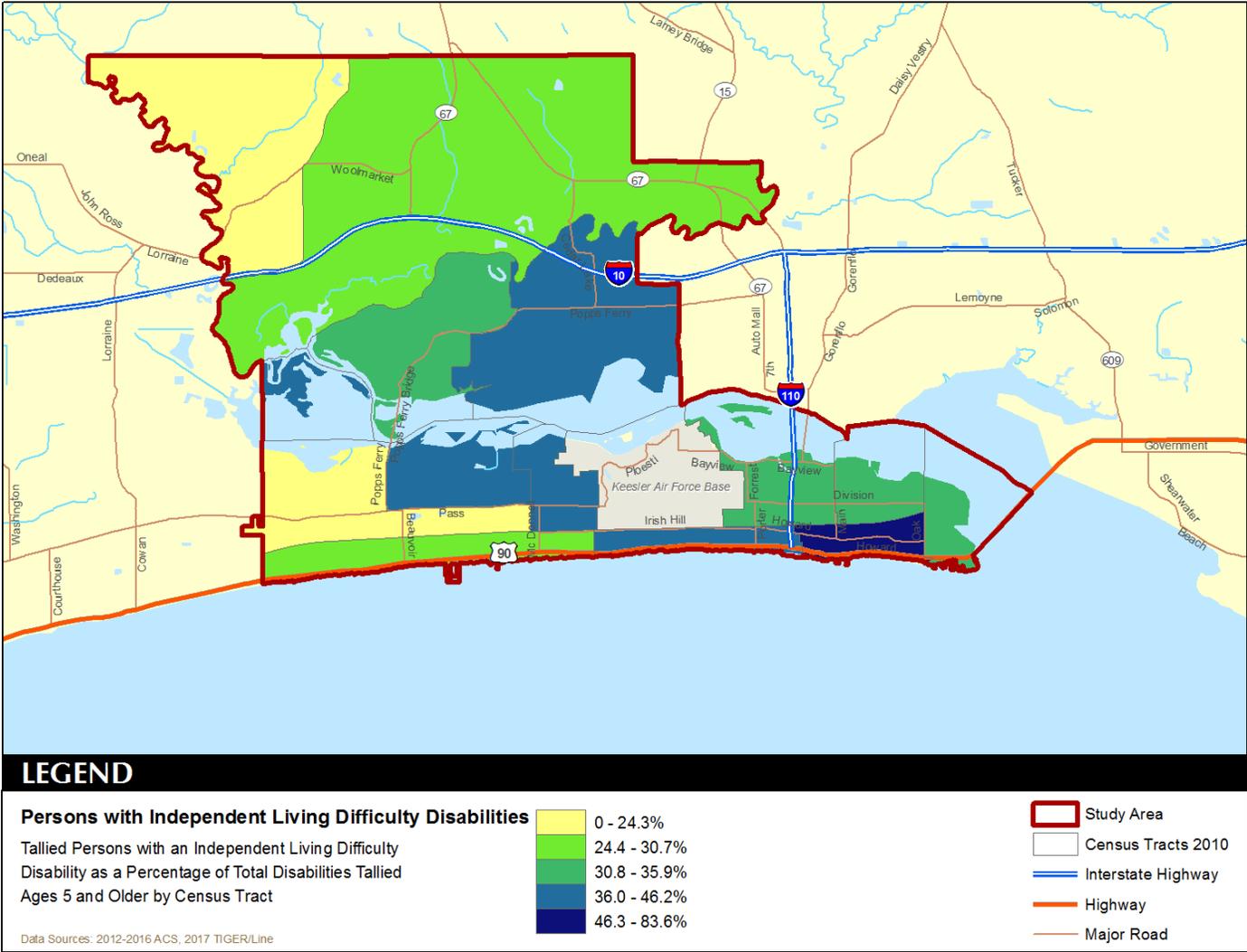
**Map IV.15**  
**Persons with Cognitive Disabilities**  
 City of Biloxi  
 AFFH Data



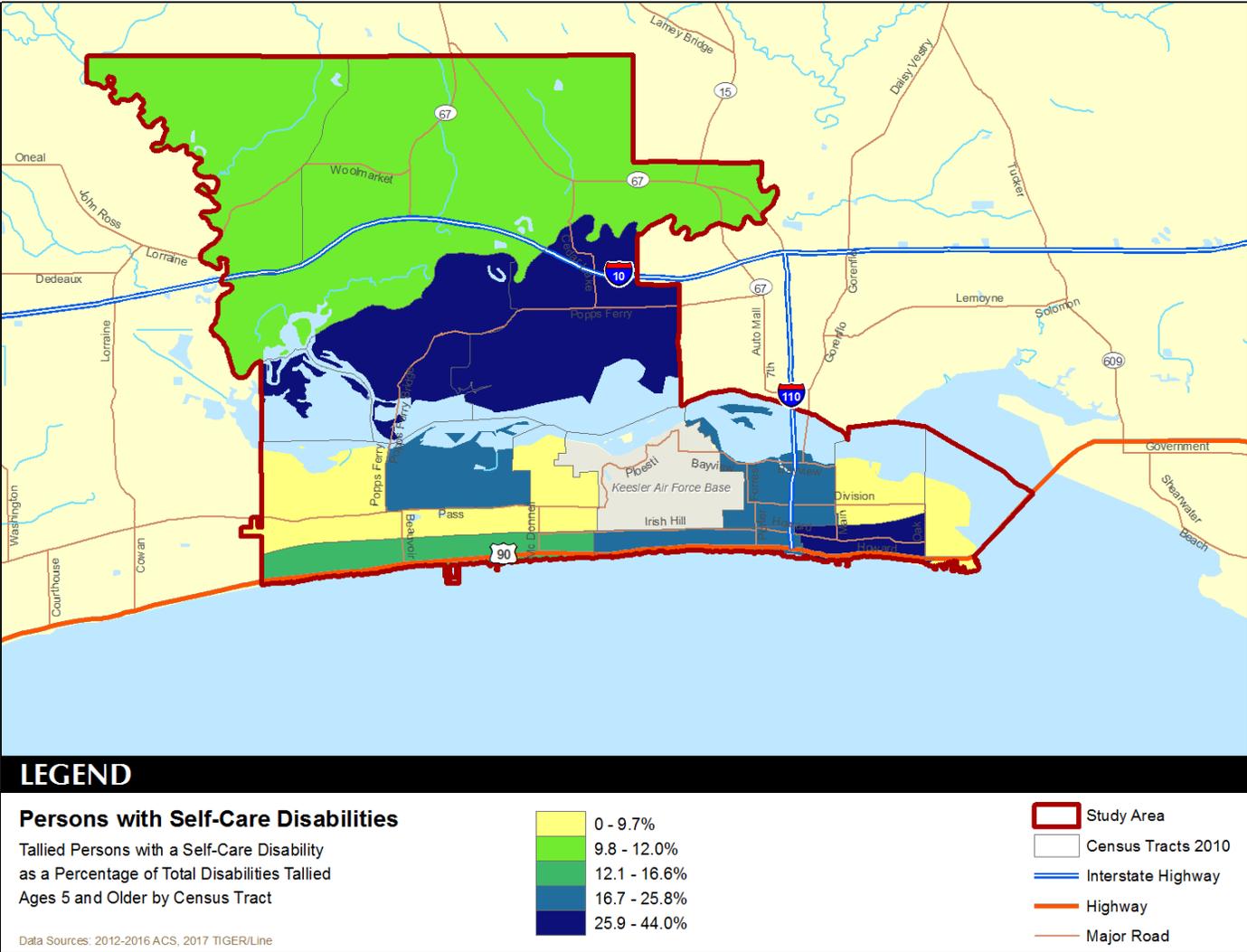
**Map IV.16**  
**Persons with Hearing Disabilities**  
 City of Biloxi  
 AFFH Data



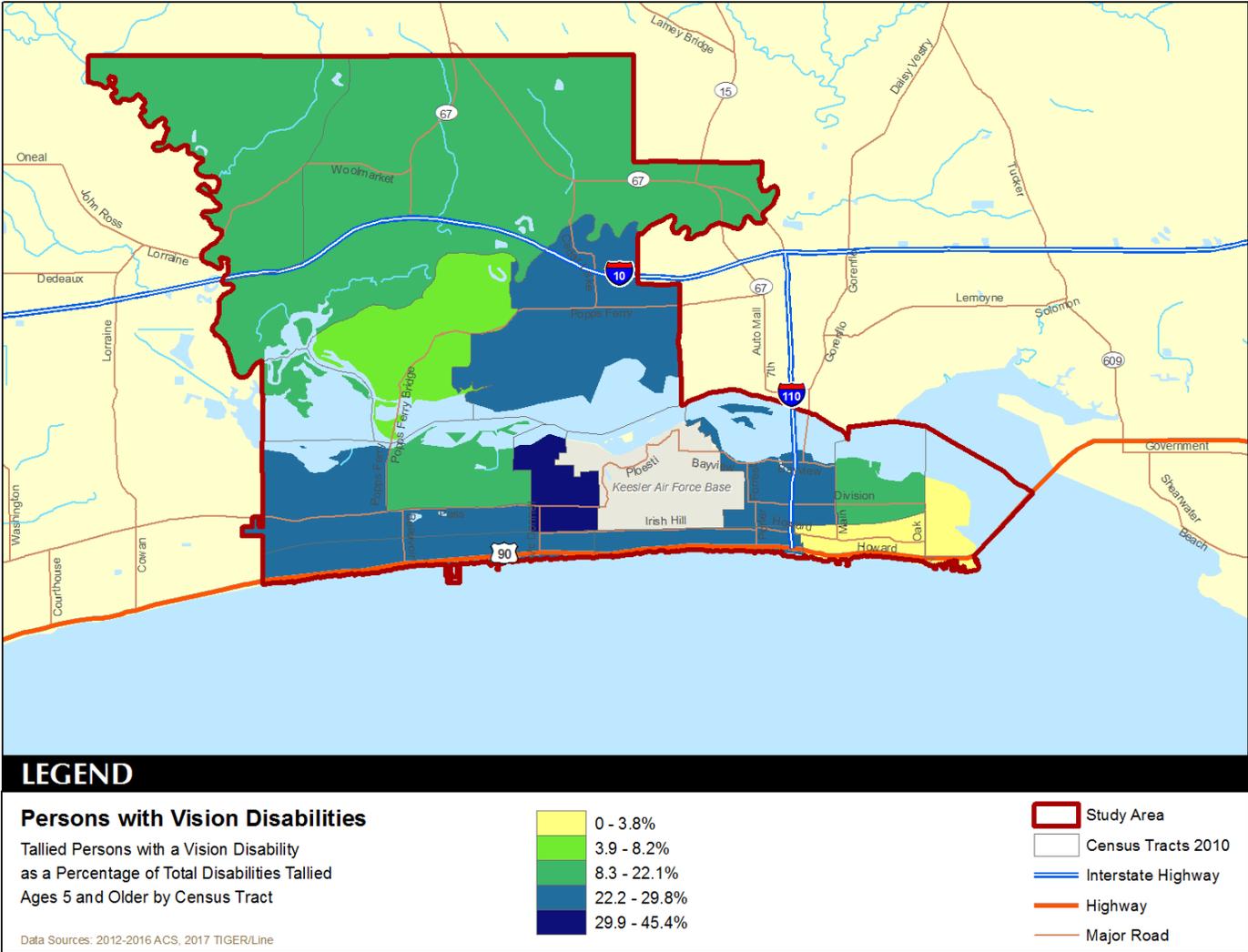
**Map IV.17**  
**Persons with Independent Living Disabilities**  
City of Biloxi  
AFFH Data



**Map IV.18**  
**Persons with Self Care Disabilities**  
City of Biloxi  
AFFH Data



**Map IV.19**  
**Persons with Vision Disabilities**  
City of Biloxi  
AFFH Data



## I. FAIR HOUSING ENFORCEMENT, OUTREACH CAPACITY & RESOURCES

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### FEDERAL FAIR HOUSING LAWS

Federal laws provide the backbone for U.S. fair housing regulations. While some laws have been previously discussed in this report, a brief list of laws related to fair housing, as defined on the U.S. Department of Housing and Urban Development's (HUD's) website, is presented below:

*Fair Housing Act* Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and persons securing custody of children under the age of 18), and handicap (disability).<sup>8</sup>

Title VIII was amended in 1988 (effective March 12, 1989) by the *Fair Housing Amendments Act* . . . In connection with prohibitions on discrimination against individuals with disabilities, the Act contains design and construction accessibility provisions for certain new multi-family dwellings developed for first occupancy on or after March 13, 1991.<sup>9</sup>

*Title VI of the Civil Rights Act of 1964.* Title VI prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance.

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

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

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

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

*Age Discrimination Act of 1975* the Age Discrimination Act prohibits discrimination on the basis of age in programs or activities receiving federal financial assistance.

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<sup>8</sup>“HUD Fair Housing Laws and Presidential Executive Orders.”

[http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/fair\\_housing\\_equal\\_opp/FHLaws](http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/FHLaws)

<sup>9</sup>“Title VIII: Fair Housing and Equal Opportunity.”

[http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/fair\\_housing\\_equal\\_opp/progdesc/title8](http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/progdesc/title8)

Title IX of the Education Amendments Act of 1972 Title IX prohibits discrimination on the basis of sex in education programs or activities that receive federal financial assistance.<sup>10</sup>

## STATE AGENCIES

At present there are no governmental agencies at the state level that accept or investigate complaints of unlawful discrimination on behalf of Mississippi residents.

## PRIVATE ORGANIZATION

The Mississippi Center for Justice, a public interest law firm, serves residents of Mississippi who believe that they have been subjected to unlawful discrimination in fair housing choice, in addition to working to “promote educational opportunity, protect the rights of consumers, secure access to healthcare, ensure equity in disaster recovery, and put affordable housing within reach of all Mississippians<sup>11</sup>.” A FHIP grantee, the Center for Justice accepts complaints from Mississippi residents who believe that they have been subjected to unlawful discrimination in housing choice. The Center for Justice has three offices throughout the state and may be contacted through the information below. The Center for Justice may also be contacted through an online contact form available at <http://www.mscenterforjustice.org/contact-us>.

### Address (Jackson Office):

5 Old River Place, Suite 203 (39202)  
P.O. Box 1023 Jackson, MS 39215-1023  
Phone: (601) 352-2269  
Fax: (601) 352-4769

### Address (Biloxi Office)

963 Division Street  
Biloxi, MS 39530-2961  
Phone: (228) 435-7284  
Fax: (228) 435-7285

### Address (Indianola Office)

120 Court Avenue  
Indianola, MS 38751  
Phone: (662) 887-6570  
Fax: (662) 887-6571

<sup>10</sup>“HUD Fair Housing Laws and Presidential Executive Orders.”

<sup>11</sup> Mississippi Center for Justice. “Our Work”. Mississippi Center for Justice Website. 3 Jan 2019. <<http://www.mscenterforjustice.org/our-work/our-work>>

## FAIR HOUSING COMPLAINTS

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

Fair Housing and Equal Opportunity (FHEO) begins its complaint investigation process shortly after receiving a complaint. A complaint must be filed within one year of the last date of the alleged discrimination under the Fair Housing Act. Other civil rights authorities allow for complaints to be filed after one year for good cause, but FHEO recommends filing as soon as possible. Generally, FHEO will either investigate the complaint or refer the complaint to another agency to investigate. Throughout the investigation, FHEO will make efforts to help the parties reach an agreement. If the complaint cannot be resolved voluntarily by an agreement, FHEO may issue findings from the investigation. If the investigation shows that the law has been violated, HUD or the U.S. Department of Justice may take legal action to enforce the law.

The complaint data presented in this section includes the entirety of the service area and does not reflect the Biloxi Housing Authority.

Over the 2008 through 2018 study period, the agency received a total of 26 complaints alleging discrimination in Biloxi. Nine of these complaints were on the basis of race, 14 for a disability, five for sex, and six for familial status.

<b>Basis</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>Total</b>
Disability	1	2	9	0	0	1	0	0	0	0	1	14
Race	4	2	1	1	0	0	0	0	0	0	1	9
Familial Status	2	2	1	0	0	0	0	0	0	0	1	6
Sex	1	0	1	0	0	0	1	1	0	0	1	5
National Origin	0	0	1	0	0	0	1	0	0	0	0	2
Religion	0	0	0	0	0	1	0	0	0	0	0	1
<b>Total Basis</b>	<b>8</b>	<b>6</b>	<b>13</b>	<b>1</b>	<b>0</b>	<b>2</b>	<b>2</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>4</b>	<b>37</b>
Total Complaints	4	5	10	1	0	2	1	1	0	0	2	26

As shown in the Table IV.74, four of those complaints were successfully resolved or settled, and 8 had no cause determination.

**Table IV.74**  
**Fair Housing Complaints by Closure**  
 City of Biloxi  
 HUD Fair Housing Complaints

<b>Basis</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>Total</b>
No cause determination	3	0	3	1	0	0	1	0	0	0	0	8
Complaint withdrawn by complainant after resolution	0	2	2	0	0	0	0	0	0	0	0	4
Conciliation/settlement successful	0	0	3	0	0	1	0	0	0	0	0	4
Complainant failed to cooperate	1	1	1	0	0	0	0	1	0	0	0	4
Complaint withdrawn by complainant without resolution	0	0	1	0	0	1	0	0	0	0	0	2
Open investigation	0	0	0	0	0	0	0	0	0	0	2	2
Election made to go to court	0	2	0	0	0	0	0	0	0	0	0	2
<b>Total Closures</b>	<b>4</b>	<b>5</b>	<b>10</b>	<b>1</b>	<b>0</b>	<b>2</b>	<b>1</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>26</b>
Total Complaints	4	5	10	1	0	2	1	1	0	0	2	26

Those who file fair housing complaints with the U.S. Department of Housing and Urban Development may include more than one discriminatory action, or issue, in those complaints. Fair housing complaints from Biloxi cited 64 issues total. Failure to make reasonable accommodation accounted for five and discriminatory terms, conditions, privileges, or services and facilities represented 10 complaints.

**Table IV.75**  
**Fair Housing Complaints by Issue**  
 City of Biloxi  
 HUD Fair Housing Complaints

<b>Issue</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>Total</b>
Discrimination in terms/conditions/privileges relating to rental	3	2	3	0	0	1	0	0	0	0	1	10
Discriminatory refusal to rent	1	1	1	1	0	1	1	1	0	0	1	8
Discriminatory terms, conditions, privileges, or services and facilities	2	0	0	1	0	1	1	1	0	0	1	7
Failure to make reasonable accommodation	1	1	3	0	0	0	0	0	0	0	0	5
Discriminatory advertising, statements and notices	0	0	1	1	0	1	1	0	0	0	1	5
Discriminatory acts under Section 818 (coercion, Etc.)	2	1	0	0	0	0	1	0	0	0	0	4
Otherwise deny or make housing unavailable	0	0	1	0	0	0	0	0	0	0	2	3
Discriminatory refusal to rent and negotiate for rental	1	0	2	0	0	0	0	0	0	0	0	3
Non-compliance with design and construction requirements (handicap)	0	0	3	0	0	0	0	0	0	0	0	3
Failure to provide an accessible building entrance	0	0	2	0	0	0	0	0	0	0	0	2
Failure to provide an accessible route into and thru the covered unit	0	0	2	0	0	0	0	0	0	0	0	2
Failure to provide accessible and usable public and common user areas	0	0	2	0	0	0	0	0	0	0	0	2
Discriminatory advertisement - rental	0	2	0	0	0	0	0	0	0	0	0	2
Discriminatory refusal to negotiate for rental	0	1	0	0	0	1	0	0	0	0	0	2
Failure to provide usable doors	0	0	1	0	0	0	0	0	0	0	0	1
Failure to provide usable kitchens and bathrooms	0	0	1	0	0	0	0	0	0	0	0	1
Discriminatory refusal to sell	0	0	0	1	0	0	0	0	0	0	0	1
Failure to provide accessible light switches, electric outlets, etc.	0	0	1	0	0	0	0	0	0	0	0	1
Failure to provide reinforced walls for grab bars	0	0	1	0	0	0	0	0	0	0	0	1
Other non-compliance with design and construction requirements	0	0	1	0	0	0	0	0	0	0	0	1
<b>Total Issues</b>	<b>10</b>	<b>8</b>	<b>25</b>	<b>4</b>	<b>0</b>	<b>5</b>	<b>4</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>6</b>	<b>64</b>
Total Complaints	4	5	10	1	0	2	1	1	0	0	2	26

## Fair Housing Complaints Found with Cause

The table below shows fair housing complaints in Biloxi found with causes by basis between 2008 and 2018. Eight complaints were found to have cause. Of these, eight were on the basis of disability, and one was on the basis of race.

Basis	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
Disability	0	2	5	0	0	1	0	0	0	0	0	8
Race	0	1	0	0	0	0	0	0	0	0	0	1
<b>Total Basis</b>	<b>0</b>	<b>3</b>	<b>5</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>9</b>
Total Complaints Found with Cause	0	2	5	0	0	1	0	0	0	0	0	8

Fair Housing complaints with cause by issue are shown in the table below. For the eight total complaints with cause, there were a total of 21 issues. Failure to make reasonable accommodation accounted for two issues, and discriminatory terms, conditions, privileges, or services and facilities, accounted for one issue.

Issue	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
Non-compliance with design and construction requirements (handicap)	0	0	3	0	0	0	0	0	0	0	0	3
Failure to make reasonable accommodation	0	1	1	0	0	0	0	0	0	0	0	2
Failure to provide accessible and usable public and common user areas	0	0	2	0	0	0	0	0	0	0	0	2
Failure to provide an accessible building entrance	0	0	2	0	0	0	0	0	0	0	0	2
Failure to provide an accessible route into and thru the covered unit	0	0	2	0	0	0	0	0	0	0	0	2
Discrimination in terms/conditions/privileges relating to rental	0	1	0	0	0	0	0	0	0	0	0	1
Discriminatory acts under Section 818 (coercion, Etc.)	0	1	0	0	0	0	0	0	0	0	0	1
Discriminatory terms, conditions, privileges, or services and facilities	0	0	0	0	0	1	0	0	0	0	0	1
Discriminatory refusal to negotiate for rental	0	0	0	0	0	1	0	0	0	0	0	1
Discriminatory advertising, statements and notices	0	0	0	0	0	1	0	0	0	0	0	1
Discriminatory refusal to rent and negotiate for rental	0	0	1	0	0	0	0	0	0	0	0	1
Failure to provide usable doors	0	0	1	0	0	0	0	0	0	0	0	1
Failure to provide usable kitchens and bathrooms	0	0	1	0	0	0	0	0	0	0	0	1
Failure to provide accessible light switches, electric outlets, etc.	0	0	1	0	0	0	0	0	0	0	0	1
Failure to provide reinforced walls for grab bars	0	0	1	0	0	0	0	0	0	0	0	1
<b>Total Issues</b>	<b>0</b>	<b>3</b>	<b>15</b>	<b>0</b>	<b>0</b>	<b>3</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>21</b>
Total Complaints Found with Cause	0	2	5	0	0	1	0	0	0	0	0	8

## MISSISSIPPI CENTER FOR JUSTICE

The Mississippi Center for Justice (MCJ) was founded in Jackson in 2003 to create a new advocacy capacity that had not existed in the state for several decades: a home-grown, nonprofit legal and policy organization that advances racial and economic justice through systemic change.

The Center is a 501(c)(3) organization with three full-time offices located in the three major regions of Mississippi, one in Jackson (Central), one in Indianola (Delta), and one in Biloxi (Coast). The Center works in coalition with community partners in each of its campaign areas – housing, health, consumer protection, and education – which provides an existing network of partnerships that includes other nonprofit public interest and social justice advocacy groups, community-based organizations, state agencies and social service providers. The Center also works with a broad range of vertical and horizontal partners, including national and regional advocacy organizations, grassroots groups, law firms, and law schools. Since 2006, the Center has engaged over 600 pro bono attorneys in its work from law firms in Mississippi and across the nation. These pro bono partners have donated over 62,000 hours of legal assistance to the Center and clients. In addition, over 3,000 volunteer law students have traveled to Mississippi to provide onsite assistance to the Center’s clients. Fair Housing advocacy and enforcement is an important component of the Center’s Housing Law Campaign. The Center received FY2013 and FY2014 grant awards from HUD to support statewide education and outreach to underserved communities regarding their rights under the Fair Housing Act. The Center received FY2016 and FY2017 grant awards from HUD to support Fair Housing testing and enforcement activity including the filing of HUD complaints on behalf of individuals alleging discrimination. The FY2016 project was statewide in scope and the project period was January 1, 2017 to December 31, 2017. The FY2017 project period is April 1, 2018 to March 31, 2021 and the scope for the first year (2018) is the following counties:

Hancock, Harrison, Jackson, George, Stone, Pearl River, Greene, Perry, Forrest, Lamar, Marion, and Walthall.

The scope for the second year (2019) is expanded to include, in addition to the above:

Pike, Amite, Wilkinson, Adams, Franklin, Lincoln, Lawrence, Jefferson Davis, Covington, Jones and Wayne. The scope for the third year is expanded further to include, in addition to the above: Jefferson, Claiborne, Copiah, Simpson, Smith, Jasper and Clarke.

## ENFORCEMENT ACTIVITY

### 2017-2018

During the 2017-2018 grant term, MCJ referred four (4) complaints to HUD for Enforcement. When expressed by protected class, three HUD complaints alleged discrimination based upon disability; two HUD complaints alleged discrimination based upon race; one HUD complaint alleged discrimination based upon sex; and one HUD complaint alleged discrimination based upon color.

When expressed by market, four HUD complaints alleged discrimination in the rental market.

When expressed by respondent, two HUD complaints alleged discrimination by an owner, a manager, and a management company. One HUD complaint alleged discrimination by a manager and owner. One HUD complaint alleged discrimination by a public housing authority.

<b>Table IV.78</b>					
<b>2017 HUD Fair Housing Complaints</b>					
MS Center for Justice Service Area					
Mississippi Center for Justice					
<b>County</b>	<b>Description</b>	<b>Basis</b>	<b>Market</b>	<b>Respondent</b>	<b>Month</b>
Harrison	Eviction action against tenant alleged to be based upon disability and race. Unequal treatment based upon race and disability.	Race, Disability	Rental	Owner, Manager, Management Company	Sep.
Forrest	Wrongful and retaliatory eviction of security deposit based on disability. Wrongful and retaliatory eviction action based upon disability.	Disability	Rental	Owner, Manager	Dec
Harrison	Difference in treatment with regard to Pet Policy based upon race and color. Plus, retaliation for asserting rights under Fair Housing Act.	Race, Color	Rental	Owner, Manager, Management Company	Dec
Hancock	Housing authority wrongfully terminated housing assistance based upon tenant's sex and disability.	Sex, Disability	Rental	Public Housing Authority	Dec

#### 2018-2019

During the 2018-19 grant term, MCJ referred nine complaints to HUD for Enforcement, as of March 31, 2019. When expressed by protected class, three HUD complaints alleged discrimination based on disability. Four HUD complaints alleged discrimination based on sex. Two HUD complaints alleged discrimination based upon race. One HUD complaint alleged discrimination based upon national origin. One HUD complaint alleged discrimination based upon religion.

When expressed by market, five HUD complaints alleged discrimination in the rental market; three HUD complaint alleged discrimination based upon failure to make reasonable accommodation; one HUD complaint alleged discrimination against a municipality based upon zoning; and one complaint alleged discrimination in the advertising market based upon religious preference.

When expressed by respondent, four HUD complaints alleged discrimination by an owner, a manager, and a management company. One HUD complaint alleged discrimination by a manager and owner. One HUD complaint alleged discrimination by a municipality. One HUD complaint alleged discrimination by a newspaper.

<b>Table IV.79</b> <b>2018 HUD Fair Housing Complaints</b> MS Center for Justice Service Area Mississippi Center for Justice			
<b>County</b>	<b>Description</b>	<b>Basis</b>	<b>Market</b>
Harrison	Landlord refusal to provide paperwork for lease-to-own trailer to transgender tenant.	Sex	Rental
Forrest	Was told his walker puts a bad image on the complex.	Disability	Rental
Harrison	Manager demanded sex for repairs and retaliates by raising rent.	National Origin, Sex	Rental
Jackson	Eviction for having a service animal	Disability	Rental
Harrison	Evicted/Lockout	Disability, Sex	Rental
Hancock	Vet being evicted because of her sex	Sex	Rental
Harrison	City of Gulfport took two of her cars	Race	Zoning
Jackson	Newspaper advertisement restricting housing to "Christians only"	Religion	Advertising
Forrest	African American couple targeted for lease-to-own scam because of race	Race	Sales

## J. PLANNING AND ZONING SURVEY

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The Planning and Zoning Survey sought to collect answers to questions regarding local governmental codes or policies and practices that may result in the creation or perpetuation of one or more impediments to fair housing choice.

The survey was intended to help with the analysis of the codes and other issues related to land use and zoning decision-making provided by participating cities of Jackson, Hattiesburg, Biloxi, Moss Point, Pascagoula, and Gulfport. The survey had a particular focus on land use and zoning practices and procedures that can act as barriers to the development of affordable housing.

The survey was intended to help with the analysis of the codes and other issues related to land use and zoning decision-making provided by each of the six participating cities in identifying impediments to fair housing choice; the survey looked to distinguish between regulatory impediments, based on specific code provisions, and practice impediments, which arise from practices or implementing policies used by the jurisdiction.

The following narrative is intended to summarize the key findings of the survey.

In the first two questions, the respondent did not see the code definitions of “family”, “dwelling unit”, or “residential unit” as having a discriminating effect against unrelated individuals with disabilities living together. Four cities did have a definition of dwelling unit and none used the term “for one family.” Additionally, four cities had a definition for the term “family” with only one mentioning “related by blood, marriage, or adoption.” Hattiesburg has a definition for the term “disability.” Hattiesburg, Jackson, and Biloxi had definitions for the term “group home” and they are permitted in single-family residential areas. Additionally, four of the cities have specific guidelines for the development and encouragement of mixed-use housing such as density allowances and non-profits being exempt from certain fees and taxes.

The results for the City of Biloxi are shown on the following page.

**Table IV.80**  
**Land use, Zoning Regulations, Practices and Procedures That May Act as Barriers to Fair Housing**  
 Biloxi  
 Fair Housing Survey

Housing	Yes	No
A definition for the term "dwelling unit" (or "residential unit")?	1	0
Does the definition of "dwelling unit" or "residential unit" include the phrase "for one family" or mention use by a "family"?	0	1
Does your jurisdiction have, in its zoning ordinance or codes, a definition for the term "family"?	1	0
Does the definition of "family" include the phrase, "related by blood, marriage, or adoption" or "related" in any other traditional sense?	1	0
Does the definition of "family" include a specific limit on the number of persons?	1	0
Guidelines that allow or encourage the development of mixed-use housing, defined as buildings serving as a combination of residential, commercial, office, institutional, or other use?	1	0
Guidelines that encourage the development of affordable housing units, such as inclusionary zoning or connections to funding or tax incentives for affordable housing projects?	1	0
Any complications that may hinder developing low- to moderate-income housing?	1	0
Residential occupancy standards or limits (outside of standard building codes), such as a standard of no more than two persons per bedroom or a limit of five unrelated persons in a single-family home?	0	1
Does the City have any inclusionary policies, such as requiring that a certain percentage of all new residential buildings must meet specific visibility/universal design requirements (such as at least one no-step entrance for wheelchair access)?	1	0
Does the City have any policies for the provision of housing that creates sustainable, inclusive, and mixed-use communities throughout the City?	1	0
Has there been an increase or decrease in the difficulty in moving into assisted housing among protected classes in your city?	0	0
Does your city have any programs to assist residents in relocation during the sale or demolition of public housing units?	0	0
A definition for the term "disability"?	0	1
Development standards for making housing accessible to persons with disabilities (outside standard building codes)?	0	0
Any special (administrative) process by which persons with disabilities can request a variance for reasonable accommodations or modifications to the jurisdiction's policies? (Outside a standard appeals process)	0	0
Standards for the development of senior housing? (Such as housing solely occupied by persons 62 years or older, or where 80% of the units are occupied by persons 55 years or older?)	0	0
Policies that distinguish senior citizen housing from other (multi-family) residential uses, such as lower parking requirements or different allowed zones?	0	0
A definition for the term "group home," "group housing," or similar, regarding housing for any other special needs populations? (such as homeless persons, victims of domestic violence, those recovering from substance abuse, youth in crisis, people living with HIV/AIDS, etc.)	1	0
Are group homes permitted in single-family residential areas?	1	0
Does your jurisdiction have a fair housing ordinance, policy, or regulation?	10	0
Does your jurisdiction have policies or practices for "affirmatively furthering fair housing"?	10	0

## K. FAIR HOUSING SURVEY

The Fair Housing survey, conducted by Western Economic Service (WES) during the latter part of 2018 and through 2019, had a total of 295 responses at the date of this document. There are 83 respondents that live in single-family homes, another 47 live in 1-4 story apartments, and 11 live in apartments with 5 or more stories.

<b>Table IV.81</b> <b>Which of the following best describes the type of housing you currently live in?</b> City of Biloxi Fair Housing Survey	
Housing	Responses
Single-family home (detached)	83
Twin-home or duplex	9
Condo/Townhouse	11
Apartment building with 1-4 stories	47
Apartment building with 5 or more stories	11
Something else, please specify	20
Missing	114
<b>Total</b>	<b>295</b>

As seen in Table IV.82, 23 respondents live in publicly-supported housing developments owned/administered by the Biloxi Housing Authority, 6 live in Multi-Family Section 8, and 5 live in Tenant Based Section 8, based on survey results.

<b>Table IV.82</b> <b>If you live in subsidized/assisted housing, please indicate what type:</b> City of Biloxi Fair Housing Survey	
Type	Responses
BHA owned/ administered housing	23
Multi-Family Section 8	6
Tenant Based Section 8	5
Project Based Section 8	9
Other Assisted Housing	6
Don't Know	15
Does Not Apply	106
Other	0
Missing	125
<b>Total</b>	<b>295</b>

Table IV.83 shows how long respondents have lived in their neighborhoods. As seen on the following page, 34 respondents have lived in their neighborhood for less than 1 year, while 20 respondents have lived in their neighborhood for 11-20 years.

<b>Table IV.83</b>	
<b>How long have you lived in your neighborhood?</b>	
City of Biloxi Fair Housing Survey	
<b>Time</b>	<b>Responses</b>
Less than 1 year	34
1-5 years	71
6-10 years	27
11-20 years	20
21-30 years	14
More than 30 years	12
Missing	117
<b>Total</b>	<b>295</b>

Table IV.84 shows the most important reasons respondents decided to live in their neighborhood. There were 39 respondents who chose the most important reason was to live near family and friends, 43 to live close to work, and 69 indicated the most important reason was affordability of housing.

<b>Table IV.84</b>	
<b>Which of the following were the most important reasons you decided to live in your neighborhood? (Check all that apply)</b>	
City of Biloxi Fair Housing Survey	
<b>Reason</b>	<b>Responses</b>
To live near family and friends	39
To be close to work	43
Accessibility of goods and services, such as neighborhood centers and stores	33
To be near public transportation	17
Physical accessibility of the building	12
Nearby schools for my children/grandchildren	28
Access to job opportunities	13
Safety in the neighborhood	59
Affordability of housing	69
I grew up here	17
No choice/ Nowhere else to go	41

If respondents had a choice to continue to live in their neighborhood, 96 respondents would, while 55 would not.

<b>Table IV.85</b> <b>If you had a choice would you continue to live in your city or neighborhood?</b> City of Biloxi Fair Housing Survey	
Yes/No	Responses
Yes	96
No	55
Not Sure	30
Missing	114
<b>Total</b>	<b>295</b>

The table below shows how respondents rate the different aspects of their neighborhood or housing development. There were 22 respondents that would rate cleanliness as excellent, while eight respondents rate cleanliness as poor. The availability of job opportunities was rated as excellent by nine respondents and poor by 38 respondents.

<b>Table IV.86</b> <b>How would you rate each of the following aspects of your neighborhood/housing development?</b> City of Biloxi Fair Housing Survey								
Aspects	Excellent	Very Good	Good	Fair	Poor	Don't Know	Missing	Total
Cleanliness	22	90	38	18	8	0	119	295
Condition of the buildings (including homes)	22	87	39	23	7	0	117	295
Condition of streets and sidewalks	15	73	48	39	4	0	116	295
Condition of the public spaces	16	100	33	23	7	0	116	295
Schools in the neighborhood	34	88	13	5	40	0	115	295
Access to public transportation	17	77	29	32	23	0	117	295
Availability of quality public housing	11	50	23	36	57	0	118	295
Availability of job opportunities	9	62	40	28	38	0	118	295

Respondents also rated how easy it is to get to a variety of places, including parks, libraries, and grocery stores. While 125 respondents said it would be easy to access supermarkets or grocery stores, 15 respondents said it would be difficult to access. If the household had a disability, 53 respondents said it was easy getting around their neighborhood or housing complex, compared to 16 saying it would be difficult.

<b>Table IV.87</b> <b>Please indicate how easy it would be for you to get to each of the following places?</b> City of Biloxi Fair Housing Survey							
Place	Easy	Slightly Difficult	Moderately Difficult	Difficult	Don't Know	Missing	Total
Parks, playgrounds or other green spaces	119	27	16	0	12	115	295
Public Libraries	121	28	14	0	10	114	295
Supermarkets or grocery stores	125	31	15	15	9	115	295
Pharmacies	122	34	9	9	14	115	295
Banks and credit unions	119	32	13	13	15	115	295
Churches, mosques, synagogues, or other religious or cultural centers	135	21	13	13	9	115	295
Community center or recreational facilities	103	41	10	10	15	114	295
Places with jobs that I/my household would want to have	63	47	17	17	22	115	295
If household with a disability, ease of getting around your neighborhood/housing complex	53	26	16	16	14	128	295

There were 65 respondents that stated that their community needs better jobs and 67 indicated the need for more jobs. 85 respondents identified the need for more affordable housing, while 61 identified the need for better roads.

<b>Table IV.88</b> <b>What Does your Community Need Most?</b> City of Biloxi Fair Housing Survey	
Percent	Responses
Better Jobs	65
More Jobs	67
Better Medical Services	33
Better Housing	49
More Affordable Housing	85
Housing Rehab	22
Better Educational Opportunities	32
Good Grocery Stores	64
Better Roads	61
Better Sidewalks	56
Better Public Safety	33
Water and Sewer Improvements	33
More Services	36
Other, please specify	26

Respondents indicated that 38% of funds should be used for housing, 13% for community facilities, and 20% for infrastructure.

<b>Table IV.89</b> <b>If you had some money to spend on these activities, what percentage would you spend on:</b> City of Biloxi Fair Housing Survey	
<b>Percent</b>	<b>Responses</b>
Housing	38
Community Facilities	13
Economic Development	15
Human Services	14
Infrastructure	20
<b>Total</b>	<b>100.0%</b>

## CURRENT HOUSING

The fair housing survey also asked questions about the respondents' current housing situation. Of the 295 respondents in the City of Biloxi, 50 respondents rent from a housing authority, 33 rent from a private landlord, and 49 own their home.

<b>Table IV.90</b> <b>Do you currently rent your home, own your home or something else?</b> City of Biloxi Fair Housing Survey	
<b>Own/Rent</b>	<b>Responses</b>
Rent from the Housing Authority	50
Rent from a private landlord	33
Rent a room	7
Renter: share a room	1
Own	49
Owner: share a room	0
Something else	26
Missing	129
<b>Total</b>	<b>295</b>

There were 63 respondents that are satisfied with their current housing situation, while 38 are dissatisfied.

<b>Table IV.91</b> <b>How Satisfied would you say you are with the quality of the housing you currently live in?</b> City of Biloxi Fair Housing Survey	
Satisfaction	Responses
Satisfied	63
Somewhat satisfied	50
Somewhat dissatisfied	19
Dissatisfied	38
Don't know	0
Missing	125
<b>Total</b>	<b>295</b>

In the past five years, 32 respondents have had their rent paid by a rental assistance program, as seen in the following table.

<b>Table IV.92</b> <b>In the past five years has your rent been paid by a rental assistance program?</b> City of Biloxi Fair Housing Survey	
Own/Rent	Responses
Yes	32
No	124
Don't know	8
Missing	131
<b>Total</b>	<b>295</b>

If respondents answered yes to the previous question, 11 respondents indicated they have had difficulty using their Section 8 voucher.

<b>Table IV.93</b> <b>If you answered "Yes" to the above question have you had difficulty using that Section 8 voucher?</b> City of Biloxi Fair Housing Survey	
Own/Rent	Responses
Yes	11
No	37
Don't know	29
Missing	218
<b>Total</b>	<b>295</b>

During the past three years, 27 respondents have indicated that their housing costs have increased a lot and increased somewhat for 40 respondents.

<b>Table IV.94</b> <b>During the past three years, how have the overall housing costs for your current home changed?</b> City of Biloxi Fair Housing Survey	
<b>Change in housing cost</b>	<b>Responses</b>
Increased a lot	27
Increased some	40
Stayed about the same	56
Decreased some	10
Decreased a lot	7
Not applicable	27
Missing	128
<b>Total</b>	<b>295</b>

There were 27 respondents that have been displaced this year as a renter, and 14 have been displaced as an owner. If respondents had been displaced, 7 indicated it was due to the property being purchased, and 2 indicated it was due to the property being demolished.

<b>Table IV.95</b> <b>If you answered “Yes” to the above question was this the result of the property being:</b> City of Biloxi Fair Housing Survey	
<b>Reason</b>	<b>Responses</b>
Purchased	7
Demolished	2
Improved/renovated	5
Foreclosed	10
Other	32
Missing	239
<b>Total</b>	<b>295</b>

During the past five years, 80 respondents looked for a new place to rent and 19 looked for a home to buy.

<b>Table IV.96</b> <b>During the past five years, have you looked for a new place to live?</b> City of Biloxi Fair Housing Survey	
Yes/No	Responses
Yes, looked for a home to rent	80
Yes, looked for a home to buy	19
No	56
Don't remember	2
Missing	138
<b>Total</b>	<b>295</b>

If the respondent has looked for a new place to live, 82 found it difficult to find safe, quality housing that they could afford in a neighborhood they wanted to live in.

<b>Table IV.97</b> <b>If you answered "Yes" to the above question did you have trouble finding safe, quality housing that you could afford in a neighborhood you would like to live in?</b> City of Biloxi Fair Housing Survey	
Property	Responses
Yes, looked for a home to rent	82
No	21
Don't remember	4
Missing	188
<b>Total</b>	<b>295</b>

In Table IV.98 on the following page, respondents were asked "If you could not find safe, affordable, quality housing do you think it was because (Check all that apply)." There were 56 respondents that stated source of income as the reason, 12 stated age, and 9 stated race/ethnicity.

**Table IV.98**  
**If you could not find safe, affordable, quality housing do you think it was because (Check all that apply):**  
 City of Biloxi  
 Fair Housing Survey

Category	Responses
Race/ethnicity	9
Religion	2
Disability	5
Sexual Orientation	1
Pregnant or having children	6
Sex/Gender	0
Age	12
Marital Status	6
National Origin	0
Ancestry	0
Familial Status	7
Criminal History/Record	5
Source of income	56

If respondents felt they had been discriminated against in their housing access due to any of the following issues, such as race/ethnicity, religion, or disability, they were able to indicate in the survey. The results are shown in the table below.

**Table IV.99**  
**Do you believe that you have been discriminated against in your housing because of any of the following (Check all that apply):**  
 City of Biloxi  
 Fair Housing Survey

Category	Responses
Race/ethnicity	12
Religion	2
Disability	9
Sexual Orientation	4
Pregnant or having children	2
Sex/Gender	1
Age	7
Marital Status	4
National Origin	0
Ancestry	0
Familial Status	5
Criminal History/Record	5
Source of income	18

There were 13 respondents that have complained of discrimination by their landlord, and five were satisfied with the outcome.

<b>Table IV.100</b> <b>Fair Housing Complaints</b> City of Biloxi Fair Housing Survey						
Complaints	Yes	No	Don't Know	Does Not Apply	Missing	Total
If you have ever been discriminated by your landlord, did you complain?	13	43	4	83	152	295
Were you satisfied with the outcome?	5	15	8	107	160	295

If a respondent filed a fair housing complaint, they were asked to indicate which agency they filed with. The results are shown in the table below.

<b>Table IV.101</b> <b>If you ever filed a fair housing complaint with an agency which one (Check all that apply):</b> City of Biloxi Fair Housing Survey	
Complaint Agency	Responses
Gulf Coast Fair Housing Center	2
Housing Education and Economic Development (HEED)	1
U.S. Department of Housing and Urban Development (HUD)	5

According to the survey responses, during the past five years 26 respondents applied for a home loan, refinancing or to take equity out of their home. Of these, 20 respondents indicated that their application was approved.

<b>Table IV.102</b> <b>Home loan Applications</b> City of Biloxi Fair Housing Survey							
Applications	Yes	No	Don't Know	Does Not Apply	Other	Missing	Total
During the past five years have you applied for a loan to purchase a home, to refinance your mortgage, or take equity out of your home?	26	96	3	29	.	141	295
Was the application you made during the past five years approved?	20	22	4	93	0	156	295

Of the survey respondents who had ever applied and been disapproved for a home loan, 31 respondents indicated it was due to their income level, and 34 respondents indicated it was due to their credit history or credit scores.

<b>Table IV.103</b> <b>If you have ever applied for a home loan and your application was NOT approved, which of the following reasons were you given? (Check all that apply):</b> City of Biloxi Fair Housing Survey	
Reason	Responses
My/our income level	31
The amount I/we had for a down payment	14
How much savings I/we had	11
The value of my property	2
My/our credit history or credit score(s)	34

Respondents indicated which issues limited their housing options. There were 84 respondents who indicated what they could afford to pay limited their housing options and 47 indicated the amount of money they had for the deposit was too low. 52 respondents indicated that their credit history and/or credit score limited their housing options.

<b>Table IV.104</b> <b>Which of the following issues, if any, limited the housing options you were able to consider (Check all that apply):</b> City of Biloxi Fair Housing Survey	
Issue	Responses
What I/we could afford to pay our rent or mortgage	84
The amount of money I/we had for deposit is too low	47
Housing large enough for my/our household	11
My/our credit history or credit score	52
Units that accommodate my/our disability (i.e. wheelchair accessible)	4
Not being shown housing in the neighborhood(s) I wanted to move into	11
Concern that I/we would not be welcome in a particular neighborhood(s)	8

## ABOUT YOU AND YOUR HOUSEHOLD

Survey respondents were asked a series of questions about their households. The responses to this section are included on the following pages. As shown in Table IV.105 on the next page, there were 57 respondents that have someone in their household with a disability, and 18 have problems within their home that create a physical/accessibility issue(s) for a member of the household. There were 40 respondents that are aware of their right to request from their landlord a change in rules or policies or a physical change to make their home more accessible if necessary due to a disability.

<b>Table IV.105</b> <b>Disability and Accommodation</b> City of Biloxi Fair Housing Survey					
Disability & Accommodation Question	Yes	No	Don't Know	Missing	Total
Are you, or someone else in your household, living with a disability?	57	76	3	150	295
Are there any problems within your home that create any physical/accessibility issues for yourself or a family member?	18	104	3	151	295
Are you aware of your right to request from your landlord, a change in rules or policies and your right to request a physical change to your housing to make your home more accessible if necessary due to a disability?	40	27	18	150	295
Have you made a request for reasonable accommodation?	13	59	3	152	295

If the household made a request for a reasonable accommodation, Table IV 106 summarizes what type of accommodation was requested.

<b>Table IV.106</b> <b>If you made a request for a reasonable accommodation, what type of accommodation did you request?</b> City of Biloxi Fair Housing Survey	
Accommodation	Responses
Assistance animal	1
Live in attendant	1
Modification of unit	0
Size of unit	1
Accessibility of unit	0
Change in rent due data	2
Transfer to another unit	3
Parking/parking space related	3
Other	20
Missing	264
<b>Total</b>	<b>295</b>

There were ten respondents who were satisfied with the outcome of their request for accommodation or modification, and who were not.

<b>Table IV.107</b> <b>Where you satisfied with the outcome of your accommodation and/or modification request?</b> City of Biloxi Fair Housing Survey	
Yes/No	Responses
Yes	10
No	10
Don't know	22
Missing	253
<b>Total</b>	<b>295</b>

The level of education and current employment status for respondents is shown in the following tables.

<b>Table IV.108</b> <b>What is the highest level of school that you have completed?</b> City of Biloxi Fair Housing Survey	
Education	Responses
Grade school or some high school	14
High school degree or equivalent	18
Completed vocational/technical school	11
Some college but no degree	60
Bachelor's degree	27
Master's degree or higher	15
Missing	150
<b>Total</b>	<b>295</b>

<b>Table IV.109</b> <b>Which of the following describes your current status?</b> City of Biloxi Fair Housing Survey	
Employment	Responses
Employed full-time	55
Employed part-time	23
Unemployed and looking for work	9
Unemployed and not looking for work	0
Unable to work due to a disability	29
Stay-at-home caregiver or parent	4
Retired	19
Student	2
Other	4
Missing	150
<b>Total</b>	<b>295</b>

60 respondents have been homeless. If the respondent had ever been homeless, respondents indicated what led to their homelessness.

<b>Table IV.110</b> <b>Have you ever been homeless?</b> City of Biloxi Fair Housing Survey	
Yes/No	Responses
Yes	60
No	86
Don't know	0
Does not apply	1
Missing	148
<b>Total</b>	<b>295</b>

<b>Table IV.111</b> <b>If you have been homeless, what led to your homelessness?</b> City of Biloxi Fair Housing Survey	
Reason	Responses
Loss of your job	19
Illness/hospitalization	7
Eviction	6
Jail/prison	1
Substance abuse issue	1
Other	32
Missing	229
<b>Total</b>	<b>295</b>

There were 143 respondents with English as their primary language at home, while one respondent uses Spanish, and three respondents use another language.

<b>Table IV.112</b> <b>What is the primary language you use at home?</b> City of Biloxi Fair Housing Survey	
Language	Responses
English	143
Spanish	1
Other	3
Missing	148
<b>Total</b>	<b>295</b>

If respondents requested their lease in their primary language, 51 respondents indicated they received it.

<b>Table IV.113</b> <b>If you requested your lease agreement or other important documents in your primary language were they provided?</b> City of Biloxi Fair Housing Survey	
Yes/No	Responses
Yes	51
No	8
Did not request	69
Missing	167
<b>Total</b>	<b>295</b>

There were 81 respondents who were able to communicate with their landlord, while 81 respondents were not.

<b>Table IV.114</b> <b>Have you been able to communicate with your landlord?</b> City of Biloxi Fair Housing Survey	
Yes/No	Responses
Yes	81
No	16
Did not request	15
Missing	183
<b>Total</b>	<b>295</b>

Of those who answered the question, five respondents are Hispanic, and 135 respondents are not.

<b>Table IV.115</b> <b>Do you consider yourself Hispanic, Latino, Latina or of Spanish origin?</b> City of Biloxi Fair Housing Survey	
Yes/No	Responses
Yes, Hispanic/Latino/Latina, or of Spanish origin	5
No, not of Hispanic/Latino/Latina, or of Spanish origin	135
Missing	155
<b>Total</b>	<b>295</b>

Of those who answered the survey question regarding gender, 38 respondents indicated that are male and 103 indicated they are female.

<b>Table IV.116</b> <b>What is your Gender?</b> City of Biloxi Fair Housing Survey	
Gender	Responses
Male	38
Female	103
Missing	148
<b>Total</b>	<b>295</b>

Table IV.117 summarizes household income in 2017 for those who answered the survey question.

<b>Table IV.117</b> <b>What was your household income in 2017</b> City of Biloxi Fair Housing Survey	
<b>Income</b>	<b>Responses</b>
Less than \$10,000	39
\$10,001 to \$20,000	36
\$20,001 to \$30,000	14
\$30,001 to \$50,000	13
\$30,001 to \$50,000	22
\$50,001 to \$100,000	10
\$100,001 to \$200,000	2
More than \$200,000	0
Missing	159
<b>Total</b>	<b>295</b>

## SECTION V. APPENDICES

### A. ADDITIONAL PLAN DATA

<b>Table V.1</b> <b>Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant</b> City of Biloxi 2008–2017 HMDA Data												
Race		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
American Indian	Originated	1.0	1.0	1.0	4.0	1.0	0.0	0.0	0.0	1.0	3.0	12.0
	Denied	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	Denial Rate	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Asian	Originated	18.0	12.0	10.0	13.0	5.0	13.0	14.0	9.0	7.0	12.0	113
	Denied	7.0	8.0	6.0	4.0	2.0	4.0	3.0	2.0	2.0	0.0	38.0
	Denial Rate	28.0%	40.0%	37.5%	23.5%	28.6%	23.5%	17.6%	18.2%	22.2%	0.0%	25.2%
Black	Originated	20	18	35	17	10	17	13	18	23	23	194
	Denied	6	16	12.0	5.0	2.0	10	5.0	4	8	7	75
	Denial Rate	23.1%	47.1%	25.5%	22.7%	16.7%	37.0%	27.8%	18.2%	25.8%	23.3%	27.9%
Pacific Islander	Originated	1.0	0.0	2.0	0.0	0.0	1.0	0.0	1.0	1.0	2.0	8.0
	Denied	1.0	0.0	0.0	0.0	0.0	2.0	0.0	0.0	1.0	0.0	4.0
	Denial Rate	50.0%	0.0%	0.0%	0.0%	0.0%	66.7%	0.0%	0.0%	50.0%	0.0%	33.3%
White	Originated	204	209	224	226	119	146	168	225	253	258	2,032
	Denied	45	35	31	33	18	32	19	37	34	30	314
	Denial Rate	18.1%	14.3%	12.2%	12.7%	13.1%	18.0%	28.6%	14.1%	11.8%	10.4%	13.4%
Not Available	Originated	10.0	11.0	18.0	7.0	7.0	13.0	5.0	11.0	11.0	10.0	103
	Denied	5.0	6.0	5.0	5.0	1.0	2.0	2.0	3.0	4.0	5.0	38
	Denial Rate	33.3%	35.3%	21.7%	41.7%	12.5%	13.3%	28.6%	21.4%	26.7%	33.3%	27.0%
Not Applicable	Originated	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.0	1.0
	Denied	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	Denial Rate	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>Originated</b>	<b>254</b>	<b>251</b>	<b>290</b>	<b>267</b>	<b>142</b>	<b>190</b>	<b>200</b>	<b>264</b>	<b>296</b>	<b>309</b>	<b>2,463</b>
	<b>Denied</b>	<b>64</b>	<b>65</b>	<b>54</b>	<b>47</b>	<b>23</b>	<b>50</b>	<b>29</b>	<b>46</b>	<b>49</b>	<b>42</b>	<b>469</b>
	<b>Denial Rate</b>	<b>20.1%</b>	<b>20.6%</b>	<b>15.7%</b>	<b>15.0%</b>	<b>13.9%</b>	<b>20.8%</b>	<b>12.7%</b>	<b>14.8%</b>	<b>14.2%</b>	<b>12.0%</b>	<b>16.0%</b>
Hispanic	Originated	11.0	7.0	7.0	4.0	4.0	3.0	5.0	10.0	10.0	13.0	74
	Denied	4.0	1.0	0.0	1.0	1.0	2.0	0.0	3.0	5.0	2.0	19.0
	Denial Rate	26.7%	12.5%	0.0%	20.0%	20.0%	40.0%	0.0%	23.1%	33.3%	13.3%	20.4%
Non-Hispanic	Originated	230	234	267	252	132	176	190	243	277	285	2,286
	Denied	58	57	47	41	21	45	28	39	40	33	409
	Denial Rate	20.1%	19.6%	15.0%	14.0%	13.7%	20.4%	12.8%	13.8%	12.6%	10.4%	15.2%

**Table V.2**  
**Loan Applications by Reason for Denial by Race/Ethnicity of Applicant**  
 City of Biloxi  
 2008–2017 HMDA Data

Denial Reason	American Indian	Asian	Black	Pacific Islander	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	0.0	10.0	16	1.0	63	7.0	0.0	97	0.0
Employment History	0.0	0.0	3.0	0.0	3.0	0.0	0.0	6.0	0.0
Credit History	0.0	2.0	23	1.0	70	7.0	0.0	103	0.0
Collateral	0.0	3.0	8.0	0.0	45	6.0	0.0	62	0.0
Insufficient Cash	0.0	2.0	3.0	1.0	9.0	2.0	0.0	17.0	0.0
Unverifiable Information	0.0	2.0	2.0	0.0	14.0	0.0	0.0	18.0	0.0
Credit Application Incomplete	0.0	3.0	4.0	0.0	23	7.0	0.0	37	0.0
Mortgage Insurance Denied	0.0	1.0	0.0	0.0	1.0	0.0	0.0	2.0	0.0
Other	0.0	4.0	5.0	0.0	16.0	0.0	0.0	25	0.0
Missing	0.0	11.0	11	1.0	70	9.0	0.0	102	19.0
<b>Total</b>	<b>0.0</b>	<b>38.0</b>	<b>75</b>	<b>4.0</b>	<b>314</b>	<b>38</b>	<b>0.0</b>	<b>469</b>	<b>0.0</b>
% Missing	0.0%	28.9%	14.7%	25.0%	22.3%	23.7%	0.0%	21.7%	19.0%

**Table V.3**  
**Denial Rates by Gender of Applicant**  
 City of Biloxi  
 2008–2017 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2008	19.7%	19.8%	33.3%	0.0%	20.1%
2009	17.6%	25.7%	25.0%	0.0%	20.6%
2010	13.5%	17.8%	33.3%	0.0%	15.7%
2011	13.7%	16.3%	40.0%	0.0%	15.0%
2012	15.4%	9.8%	14.3%	0.0%	13.9%
2013	19.8%	25.0%	16.7%	0.0%	20.8%
2014	13.2%	10.8%	20.0%	0.0%	12.7%
2015	14.5%	13.8%	30.0%	0.0%	14.8%
2016	11.7%	19.2%	20.0%	0.0%	14.2%
2017	12.1%	9.7%	28.6%	0.0%	12.0%
<b>Average</b>	<b>15.0%</b>	<b>17.3%</b>	<b>26.4%</b>	<b>0.0%</b>	<b>16.0%</b>

**Table V.4**  
**Loan Applications by Selected Action Taken by Gender of Applicant**

City of Biloxi  
 2008–2017 HMDA Data

Gender		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
Male	Originated	167	164	192	182	99	138	138	188	204	204	1,676
	Denied	41	35	30	29	18	34	21	32	27	28	295
	Denial Rate	19.7%	17.6%	13.5%	13.7%	15.4%	19.8%	13.2%	14.5%	11.7%	12.1%	15.0%
Female	Originated	81	84	88	82	37	42	58	69	84	93	718
	Denied	20	29	19	16	4	14	7.0	11	20	10	150
	Denial Rate	19.8%	25.7%	17.8%	16.3%	9.8%	25.0%	10.8%	13.8%	19.2%	9.7%	17.3%
Not Available	Originated	6.0	3.0	10.0	3.0	6.0	10.0	4.0	7.0	8.0	10.0	67
	Denied	3.0	1.0	5.0	2.0	1.0	2.0	1.0	3.0	2.0	4.0	24
	Denial Rate	33.3%	25.0%	33.3%	40.0%	14.3%	16.7%	20.0%	30.0%	20.0%	28.6%	26.4%
Not Applicable	Originated	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	2.0	2.0
	Denied	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	Denial Rate	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Total	Originated	254	251	290	267	142	190	200	264	296	309	2,463
	Denied	64	65	54	47	23	50	29	46	49	42	469
	Denial Rate	20.1%	20.6%	15.7%	15.0%	13.9%	20.8%	12.7%	14.8%	14.2%	12.0%	16.0%

**Table V.5**  
**Denial Rates by Income of Applicant**

City of Biloxi  
 2008–2017 HMDA Data

Income	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
\$30,000 or Below	37.9%	22.4%	32.5%	21.9%	31.6%	50.0%	46.2%	31.8%	44.7%	46.2%	34.5%
\$30,001–\$50,000	22.7%	36.4%	18.7%	19.7%	6.1%	22.2%	5.4%	10.8%	16.9%	19.0%	18.8%
\$50,001–\$75,000	13.8%	20.2%	6.9%	12.5%	22.4%	25.8%	10.2%	13.8%	8.5%	4.4%	13.0%
\$75,001–\$100,000	22.6%	10.0%	16.3%	7.5%	9.4%	6.7%	11.9%	25.0%	5.1%	9.2%	12.2%
\$100,001–\$150,000	13.2%	0.0%	17.6%	17.1%	6.7%	16.2%	11.1%	6.7%	2.0%	5.5%	9.9%
Above \$150,000	21.7%	12.5%	9.1%	16.1%	0.0%	18.8%	19.0%	14.7%	10.3%	3.4%	13.2%
Data Missing	20.0%	20.0%	16.7%	0.0%	0.0%	33.3%	50.0%	20.0%	80.0%	16.7%	23.4%
<b>Total</b>	<b>20.1%</b>	<b>20.6%</b>	<b>15.7%</b>	<b>15.0%</b>	<b>13.9%</b>	<b>20.8%</b>	<b>12.7%</b>	<b>14.8%</b>	<b>14.2%</b>	<b>12.0%</b>	<b>16.0%</b>

**Table V.6**  
**Loan Applications by Income of Applicant: Originated and Denied**  
 City of Biloxi  
 2008–2017 HMDA Data

<b>Income</b>		<b>2008</b>	<b>2009</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>Total</b>
\$30,000 or Below	Loan Originated	18	38	27	25	13	8	7	15	21	14	186
	Application Denied	11	11	13	7.0	6.0	8.0	6.0	7.0	17.0	12.0	98
	Denial Rate	37.9%	22.4%	32.5%	21.9%	31.6%	50.0%	46.2%	31.8%	44.7%	46.2%	34.5%
\$30,001 –\$50,000	Loan Originated	58	49	61	57	31	35	53	58	69	64	535
	Application Denied	17	28	14	14.0	2.0	10	3.0	7.0	14	15	124
	Denial Rate	22.7%	36.4%	18.7%	19.7%	6.1%	22.2%	5.4%	10.8%	16.9%	19.0%	18.8%
\$50,001 –\$75,000	Loan Originated	69	67	94	70	38	46	53	69	75	87	668
	Application Denied	11.0	17.0	7.0	10.0	11.0	16.0	6.0	11.0	7.0	4.0	100
	Denial Rate	13.8%	20.2%	6.9%	12.5%	22.4%	25.8%	10.2%	13.8%	8.5%	4.4%	13.0%
\$75,001 –\$100,000	Loan Originated	41	45	41	49	29	42	37	33	56	59	432
	Application Denied	12.0	5.0	8.0	4.0	3.0	3.0	5.0	11.0	3.0	6.0	60
	Denial Rate	22.6%	10.0%	16.3%	7.5%	9.4%	6.7%	11.9%	25.0%	5.1%	9.2%	12.2%
\$100,001 –\$150,000	Loan Originated	46	27	42	34	14	31	32	56	48	52	382
	Application Denied	7.0	0.0	9.0	7.0	1.0	6.0	4.0	4.0	1.0	3.0	42
	Denial Rate	13.2%	0.0%	17.6%	17.1%	6.7%	16.2%	11.1%	6.7%	2.0%	5.5%	9.9%
Above \$150,000	Loan Originated	18.0	21.0	20.0	26.0	13.0	26	17	29	26	28	224
	Application Denied	5.0	3.0	2.0	5.0	0.0	6.0	4.0	5.0	3.0	1.0	34
	Denial Rate	21.7%	12.5%	9.1%	16.1%	0.0%	18.8%	19.0%	14.7%	10.3%	3.4%	13.2%
Data Missing	Loan Originated	4.0	4.0	5.0	6.0	4.0	2.0	1.0	4.0	1.0	5.0	36
	Application Denied	1.0	1.0	1.0	0.0	0.0	1.0	1.0	1.0	4.0	1.0	11.0
	Denial Rate	20.0%	20.0%	16.7%	0.0%	0.0%	33.3%	50.0%	20.0%	80.0%	16.7%	23.4%
<b>Total</b>	<b>Loan Originated</b>	<b>254</b>	<b>251</b>	<b>290</b>	<b>267</b>	<b>142</b>	<b>190</b>	<b>200</b>	<b>264</b>	<b>296</b>	<b>309</b>	<b>2,463</b>
	<b>Application Denied</b>	<b>64</b>	<b>65</b>	<b>54</b>	<b>47</b>	<b>23</b>	<b>50</b>	<b>29</b>	<b>46</b>	<b>49</b>	<b>42</b>	<b>469</b>
	<b>Denial Rate</b>	<b>20.1%</b>	<b>20.6%</b>	<b>15.7%</b>	<b>15.0%</b>	<b>13.9%</b>	<b>20.8%</b>	<b>12.7%</b>	<b>14.8%</b>	<b>14.2%</b>	<b>12.0%</b>	<b>16.0%</b>

<b>Table V.7</b>								
<b>Denial Rates of Loans by Race/Ethnicity and Income of Applicant</b>								
City of Biloxi 2008–2017 HMDA Data								
<b>Race</b>	<b>\$30,000 or Below</b>	<b>\$30,001 – \$50,000</b>	<b>\$50,001 –\$75,000</b>	<b>\$75,001 –\$100,000</b>	<b>\$100,001 –\$150,000</b>	<b>&gt; \$150,000</b>	<b>Data Missing</b>	<b>Average</b>
American Indian	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Asian	34.5%	19.5%	25.7%	31.2%	11.8%	27.3%	50.0%	25.2%
Black	59.1%	36.8%	12.1%	12.8%	15.2%	27.8%	100.0%	27.9%
Pacific Islander	100.0%	60.0%	0.0%	0.0%	0.0%	0.0%	0.0%	33.3%
White	28.8%	15.0%	12.1%	10.8%	8.1%	11.3%	15.0%	13.4%
Not Available	50.0%	39.3%	19.4%	25.9%	24.1%	12.5%	100.0%	27.0%
Not Applicable	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
<b>Average</b>	<b>34.5%</b>	<b>18.8</b>	<b>13.0%</b>	<b>12.2%</b>	<b>9.9%</b>	<b>13.2%</b>	<b>23.4%</b>	<b>16.0%</b>
Non-Hispanic	21.1%	22.7	13.8%	28.6%	10.0%	25.0%	100.0%	20.4%
Hispanic	34.9%	17.6	12.6%	11.3%	8.7%	12.9%	14.6%	15.2%

**Table V.8**  
**Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied**  
 City of Biloxi  
 2008–2017 HMDA Data

Race		\$30,000 or Below	\$30,001 – \$50,000	\$50,001 – \$75,000	\$75,001 – \$100,000	\$100,001 – \$150,000	> \$150,000	Data Missing	Total
American Indian	Loan Originated	0.0	2.0	3.0	7.0	0.0	0.0	0.0	12.0
	Application Denied	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	Denial Rate	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Asian	Loan Originated	19.0	33.0	26.0	11.0	15.0	8.0	1.0	113
	Application Denied	10.0	8.0	9.0	5.0	2.0	3.0	1.0	38.0
	Denial Rate	34.5%	19.5%	25.7%	31.2%	11.8%	27.35	50.0%	25.2%
Black	Loan Originated	18	43	58	34	28	13.0	0.0	194
	Application Denied	26	25	8	5.0	5.0	5.0	1.0	75
	Denial Rate	59.1%	36.8%	12.1%	12.8%	15.2%	27.8%	100.0%	33.3%
Pacific Islander	Loan Originated	0.0	2.0	2.0	3.0	0.0	1.0	0.0	8.0
	Application Denied	1.0	3.0	0.0	0.0	0.0	0.0	0.0	4.0
	Denial Rate	100.0%	60.0%	0.0%	0.0%	0.0%	0.0%	0.0%	33.3%
White	Loan Originated	148	438	550	357	317	188	34	2,032
	Application Denied	60	77	76	43	28	24.0	6.0	314
	Denial Rate	28.8%	15.0%	12.1%	10.8%	8.1%	11.3%	15.0%	13.4%
Not Available	Loan Originated	1.0	17	29	20.0	22.0	14.0	0.0	103
	Application Denied	1.0	11.0	7.0	7.0	7.0	2.0	3.0	38
	Denial Rate	50.0%	39.3%	19.4%	25.9%	24.1%	12.5%	100.0%	27.0%
Not Applicable	Loan Originated	0.0	0.0	0.0	0.0	0.0	0.0	1.0	1.0
	Application Denied	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	Denial Rate	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>Loan Originated</b>	<b>186</b>	<b>535</b>	<b>668</b>	<b>432</b>	<b>382</b>	<b>224</b>	<b>36</b>	<b>2,463</b>
	<b>Application Denied</b>	<b>98</b>	<b>124</b>	<b>100</b>	<b>60</b>	<b>42</b>	<b>34</b>	<b>11.0</b>	<b>469</b>
	<b>Denial Rate</b>	<b>34.5%</b>	<b>18.8%</b>	<b>13.0%</b>	<b>12.2%</b>	<b>9.9%</b>	<b>13.2%</b>	<b>23.4</b>	<b>16.0%</b>
Hispanic	Loan Originated	15.0	17	25.0	5.0	9.0	3.0	0.0	74
	Application Denied	4.0	5.0	4.0	2.0	1.0	1.0	2.0	19.0
	Denial Rate	21.1%	22.7%	13.8%	28.6%	10.0%	25.0%	100.0%	20.4%
Non-Hispanic	Loan Originated	168	504	617	407	346	209	35	2,286
	Application Denied	90	108	89	52	33	31.0	6.0	409
	Denial Rate	34.9%	17.6%	12.6%	11.3%	8.7%	12.9%	14.6%	15.2%

**Table V.9**  
**Loans by HAL Status by Race/Ethnicity of Borrower**

City of Biloxi  
 2008–2017 HMDA Data

Race	Loan Type	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
American Indian	HAL	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	Other	1.0	1.0	1.0	4.0	1.0	0.0	0.0	0.0	1.0	3.0	9.0
	Percent HAL	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Asian	HAL	1.0	2.0	0.0	0.0	1.0	0.0	0.0	0.0	0.0	0.0	4.0
	Other	17.0	10.0	10.0	13.0	4.0	13.0	14.0	9.0	7.0	12.0	97
	Percent HAL	5.6%	16.7%	0.0%	0.0%	20.0%	0.0%	0.0%	0.0%	0.0%	0.0%	4.0%
Black	HAL	4.0	1.0	0.0	0.0	2.0	0.0	0.0	1.0	0.0	0.0	8
	Other	16	17	35	17	8	17	13	17	23	23	163
	Percent HAL	20.0%	5.6%	0.0%	0.0%	20.0%	0.0%	0.0%	5.6%	0.0%	0.0%	4.7%
Pacific Islander	HAL	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	Other	1.0	0.0	2.0	0.0	0.0	1.0	0.0	1.0	1.0	2.0	6.0
	Percent HAL	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
White	HAL	18	15	2.0	5.0	3.0	0.0	0.0	1.0	0.0	2.0	44
	Other	186	194	222	221	116	146	168	224	253	256	1,730
	Percent HAL	8.8%	7.2%	0.9%	2.2%	2.5%	0.0%	0.0%	0.4%	0.0%	0.8%	2.5%
Not Available	HAL	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	Other	10.0	11.0	18.0	7.0	7.0	13.0	5.0	11.0	11.0	10.0	163
	Percent HAL	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Not Applicable	HAL	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	Other	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.0	0.0
	Percent HAL	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>HAL</b>	<b>23</b>	<b>18</b>	<b>2.0</b>	<b>5.0</b>	<b>6.0</b>	<b>0.0</b>	<b>0.0</b>	<b>2.0</b>	<b>0.0</b>	<b>2.0</b>	<b>58</b>
	<b>Other</b>	<b>231</b>	<b>233</b>	<b>288</b>	<b>262</b>	<b>136</b>	<b>190</b>	<b>200</b>	<b>262</b>	<b>296</b>	<b>307</b>	<b>2,405</b>
	<b>Percent HAL</b>	<b>9.1%</b>	<b>7.2%</b>	<b>0.7%</b>	<b>1.9%</b>	<b>4.2%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.8%</b>	<b>0.0%</b>	<b>0.6%</b>	<b>2.4%</b>
Hispanic	HAL	2.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	59
	Other	9.0	7.0	7.0	4.0	4.0	3.0	5.0	10.0	10.0	13.0	2.0
	Percent HAL	18.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	3.3%
Non-Hispanic	HAL	21	17	2.0	5.0	6.0	0.0	0.0	2.0	0.0	2.0	1,948
	Other	209	217	265	247	126	176	190	241	277	283	53
	Percent HAL	9.1%	7.3%	0.7%	2.0%	4.5%	0.0%	0.0%	0.8%	0.0%	0.7%	2.6%

**Table V.10**  
**Rates of HALs by Income of Borrower**

City of Biloxi  
 2008–2017 HMDA Data

Income	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Average
\$30,000 or Below	5.6%	7.9%	0.0%	4.0%	30.8%	0.0%	0.0%	6.7%	0.0%	0.0%	5.8%
\$30,001–\$50,000	12.1%	8.2%	0.0%	1.8%	6.5%	0.0%	0.0%	0.0%	0.0%	1.6%	3.0%
\$50,001–\$75,000	8.7%	1.5%	1.1%	1.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.5%
\$75,001–\$100,000	7.3%	4.4%	0.0%	0.0%	0.0%	0.0%	0.0%	3.0%	0.0%	1.7%	1.6%
\$100,00–\$150,000	6.5%	3.7%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.2%
Above \$150,000	16.7%	33.3%	5.0%	7.7%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	6.6%
Data Missing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
<b>Average</b>	<b>9.1%</b>	<b>7.2%</b>	<b>0.7%</b>	<b>1.9%</b>	<b>4.2%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.8%</b>	<b>0.0%</b>	<b>0.6%</b>	<b>2.4%</b>

**Table V.11**  
**Loans by HAL Status by Income of Borrower**

City of Biloxi  
 2008–2016 HMDA Data

Income		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
\$30,000 or Below	HAL	1.0	3.0	0.0	1.0	4.0	0.0	0.0	1.0	0.0	0.0	10
	Other	17	35	27	24	9	8	7	14	21	14	162
	Percent HAL	5.6%	7.9%	0.0%	4.0%	30.8%	0.0%	0.0%	6.7%	0.0%	0.0%	5.8%
\$30,001 –\$50,000	HAL	7.0	4.0	0.0	1.0	2.0	0.0	0.0	0.0	0.0	1.0	14
	Other	51	45	61	56	29	35	53	58	69	63	457
	Percent HAL	12.1%	8.2%	0.0%	1.8%	6.5%	0.0%	0.0%	0.0%	0.0%	1.6%	3.0%
\$50,001 –\$75,000	HAL	6.0	1.0	1.0	1.0	0.0	0.0	0.0	0.0	0.0	0.0	9
	Other	63	66	93	69	38	46	53	69	75	87	572
	Percent HAL	8.7%	1.5%	1.1%	1.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.5%
\$75,001 – \$100,000	HAL	3.0	2.0	0.0	0.0	0.0	0.0	0.0	1.0	0.0	1.0	6.0
	Other	38	43	41	49	29	42	37	32	56	58	367
	Percent HAL	7.3%	4.4%	0.0%	0.0%	0.0%	0.0%	0.0%	3.0%	0.0%	1.7%	1.6%
\$100,001 –150,000	HAL	3.0	1.0	0.0	0.0	<b>0.0</b>	0.0	0.0	0.0	0.0	0.0	4.0
	Other	43	26	42	34	14	31	32	56	48	52	326
	Percent HAL	6.5%	3.7%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.2%
Above \$150,000	HAL	3.0	7.0	1.0	2.0	0.0	0.0	0.0	0.0	0.0	0.0	13.0
	Other	15.0	14.0	19.0	24.0	13.0	26.0	17	29	26	28	183
	Percent HAL	16.7%	33.3%	5.0%	7.7%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	6.6%
Data Missing	HAL	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	Other	4.0	4.0	5.0	6.0	4.0	2.0	1.0	4.0	1.0	5.0	36
	Percent HAL	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>Other</b>	<b>23</b>	<b>18</b>	<b>2.0</b>	<b>5.0</b>	<b>6.0</b>	<b>0.0</b>	<b>0.0</b>	<b>2.0</b>	<b>0.0</b>	<b>2.0</b>	<b>58</b>
	<b>HAL</b>	<b>231</b>	<b>233</b>	<b>288</b>	<b>262</b>	<b>136</b>	<b>190</b>	<b>200</b>	<b>262</b>	<b>296</b>	<b>307</b>	<b>2,405</b>
	<b>Percent HAL</b>	<b>9.1%</b>	<b>7.2%</b>	<b>0.7%</b>	<b>1.9%</b>	<b>4.2%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.8%</b>	<b>0.0%</b>	<b>0.6%</b>	<b>2.4%</b>

## B. PUBLIC INPUT COMMENTS

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### 10/4/2018 Disability and Access Work Group

(Via Webinar)

Moderator: Rob Gaudin, Western Economic Services

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**Comment:** We have many with Mental Illness; they are the ones who are losing housing. What can we do about that?

**Presenter:** I don't have all the answers. I am hoping you can offer some perspective and commentary about what we can do about that. We can certainly allocate more resources there. That would be one thing. Maybe we need to find out where the worst cases are so my question to you would be where are the most frequent cases where mental illness has robbed these people of their ability to get a home.

**Comment:** Is this data based on NON-institutionalized population, or the total? If it includes those in institutions, that might help explain concentrations if there is one in that region.

**Presenter:** It is the total. If it includes those in institutions it might help explain concentrations if there is one in that region. This is total population as according to the American Community Survey. So for those who were contacted it does include institutionalized populations for those who can communicate.

**Comment:** On the coast.

**Comment:** The lack of affordable housing leaves ex-offenders competing for the same limited resources with others who have no criminal history. Barriers to housing: age (below 21) Criminal record; HUD prioritizes chronic but if someone is in treatment or incarcerated for 60-90 days, they are not considered chronic (but they Will BE). They may be incarcerated before trial but found not guilty at trial. It still knocks them off the chronic list.

**Presenter:** Thanks.

Presentation

**Comment:** Issue for those with mental disability is long-term support services once housed.

**Comment:** People with disabilities TEND to congregate in urban areas because of the "walkability" and access to public transit. It strikes me as odd that we don't see that pattern (at least at first blush). Why would that be?

**Presenter:** Some people do not access to services. They are unable to move. Beyond that I am not certain. This is partly for us to explore. Hopefully you can offer some perspective and commentary about that.

**Comment:** This jeopardizes housing.

Presentation

**Comment:** I live in Jackson and the answer is DEFINITELY NO. Even NEW construction is willfully avoiding building accessible units...exploiting loopholes in ADA requirements. WHY?

**Presenter:** That is a common problem throughout many of the jurisdictions in which we work. Sometimes it is related to government not having the skilled individuals who would inspect the property across many barriers, for example there was a client, we had one time several years ago, where the people who inspected the inside of the building were different than the people who inspected the outside of the building. The people who inspected the inside said it looks great, but the outside of the building for those who had an ambulatory disability there was difficulty, there was no ramp. It was like four or five steps up. It was built to code, but the inside was one set and the outside was a different set. So, there could be challenges within the building codes and those who inspect the buildings. There could be places where people aren't doing it because the laws are not as enforced as they should be. I agree with you that there are challenges.

Presentation

**Comment:** For instance, I'm told that Federal Housing Tax Credits does NOT trigger the minimum 5% accessible unit requirement of the Rehab Act. This is a major problem and being exploited by certain developers.

**Presenter:** If this is true, I am sure that it is being exploited. It should not be administered that way. Perhaps the Home Corp can respond.

**Comment:** The simple response to the last question is that developments are required to comply with ADA. I can't speak specifically off the top of my head to the rehab ADA requirement, but certainly new construction has to comply with Federal ADA requirements.

**Comment:** Officials in all cities in Mississippi fail to enforce the Building Codes. We need educated people as building inspectors.

Presentation

**Comment:** Restating, LIHTC projects must comply with ADA requirements for new construction.

**Presenter:** Thank you.

Presentation

**Comment:** I think all of these are very challenging for people with mental illness, including children, and their families. Part of the problem seems to be that formal systems don't seem to focus on what it takes to live in the community and things aren't very coordinated among systems or between private and public sectors.

**Presenter:** I think that is a great point. Sometimes communities wish to do things and people are just not talking about the same thing when they communicate. I certainly hope that with this avenue we can get the ball moving towards that direction and enhance our communication a little bit better.

Presentation

**Comment:** I think you skipped question 3.

Presentation

**Comment:** People with disabilities need permanent supportive housing, they need to be prioritized by PHAs and transportation needs to be available more consistently.

**Comment:** Thank you.

Presentation

**Comment:** One piece of this is that the ACCESSIBLE housing must be rent controlled.... meaning, rents that remain fixed because our incomes are fixed.

**Presenter:** Good Point. Thank you.

Presentation

**Comment:** Chapter 11 of the International Building Code is essentially the same as ADAAG. It has been the State Building Code since 2009. We need to do a better job of enforcing it. It tends to get enforced in commercial buildings in the cities, but residential enforcement is lax.

**Comment:** Poor credit, limited credit are contributing factors.

**Presenter:** Most certainly.

**Comment:** I'm aware of a recent incident in Jackson where neighbors objected to a sober living group home. How are we (society) going to deal with the "Not in my neighborhood" attitude?

**Presenter:** The NIMBYism, the Not in My Back Yard attitude, sometimes people do note Not on Planet Earth. I think we can do better than that. I think we can communicate the benefits of this form of housing for our citizens.

Presentation

**Comment:** Hazlehurst Housing Authority: City of Hazlehurst Barriers: Transportation, Jobs and Housing Opportunity such as rental housing stock.

**Comment:** Do we send comments directly to you?

**Presenter:** Please send them to David Hancock and they will forward then to me.

**Comment:** As for disproportionate Individuals are almost always have to settle for inaccessible placement, because there are not enough. The local ADA standard needs to reflect all housing units and not just % of.

Presentation

**Comment:** Will a power point be provided for this presentation?

**Presenter:** This presentation and all the sound and everything is being recorded. We can provide that. If you just want a copy of this presentation, I can make sure that David Hancock gets a copy so you can get it from him. He may be able to post it, but that is up to him. He will have both is presentation, the comments received, the comments that I have read.

Presentation

## 10/18/2018 Mississippi Disability and Access Workgroup

(Via Webinar)

Moderator: Rob Gaudin, Western Economic Services

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**Comment:** I am certain that many folks with disabilities are being segregated in specialized housing units. I am sure that is true across the disability spectrum including people with intellectual disabilities. I can tell you that most of the accessible housing that I know of in Jackson is segregated and that is never, it is never good policy. We need to be integrating people with disabilities in and amongst everyone else.

**Presenter:** Thank you. In order to accomplish this in Jackson, they have a housing authority and they are also an entitlement, who should be taking the lead on this integration effort and what do you think should be done?

**Comment:** In my opinion we need to be developing policies that mandate all new housing projects to have a certain number of fully wheelchair accessible units. I think it needs to be 10 percent and by fully wheelchair accessible I don't mean portable. That is boldly inadequate. I am talking about a roll-in shower and fully accessible kitchen units. Now if we spread these units out to new developments that people with disabilities will be integrated into all the communities around our cities. That is the goal. You want integration. The other thing that would probably need to happen and it would absolutely need to happen for people on fixed incomes which is most of us on disability is we would have to have some kind of sliding scale rent that did not exceed 30 percent of our take home income. That is what is reasonable to expect someone to pay. Does that make sense?

**Presenter:** Yes, what you are saying makes sense. I am hearing you say that there is insufficient accessible housing and that the accessible housing that is to become available needs to be sensitive to the persons with disabilities and their level of income.

**Comment:** Right. Right.

**Presenter:** We had a question. Why these meetings only are focused on disability? Are there meetings focused on race, ethnicity, and other protected classes? These meetings are focused on disability because, disability is not reported very often, and we want to get peoples experience. We have analyzed Home Mortgage Disclosure Act information; we can conduct Fair Housing Surveys, and we can get quantitative data on some of these things, but I think it is important to try to be able to get a sense of what people are facing if they have one of these disabilities. So that is why we are dealing with these four meetings for Disabilities and Access Work Groups.

Presentation

**Comment:** I know my friends in the blind community have a very significant need for transportation. Where their housing is relative to transportation it is the most vital thing on their agenda. In other words, let's say a person who is blind lives just outside the City of Jackson; they will not have access to transit within Jackson by virtue of the fact that they live just outside the city limits. So therefore, that is a huge disadvantage for them and very isolating for them. Just by the fact that they don't live in the jurisdiction served by Paratransit. So that is absolutely vital. Where the affordable housing is relative to transportation must be considered especially for people who are blind or disabled.

**Presenter:** So, in this particular example for Jackson who or which agency should take the lead on this? The city or department gets the...

**Comment:** I am not the policy expert. I am a person with a disability, and I am here to speak for people with disabilities. I think there are lots of brainstorming, we need to do a lot of brainstorming, and we really do. One way of doing it is embracing transit orientated development. Take your major transit corridors where you have got better bus service and build the accessible affordable housing along those corridors. So that you are automatically building in mobility along those transit corridors. That is just one possibility.

**Presenter:** Thank you.

Presentation

**Comment:** My suggestion is and we have been talking to the city already is that local jurisdictions ought to demand that new developments include at least 10 percent fully accessible units, by that I mean fully wheelchair accessible with roll-in showers, integrated into their plan so that you have got people of varying abilities living amongst everyone else and obviously it is just good policy to build these along transit corridors so that we can plan for the day that more of us use public transit. That is just good policy.

**Presenter:** Thank you.

Presentation

**Comment:** MHC has adopted in federal programs HOME & HTF policies and procedures to address affordable housing for persons with disabilities by offering incentives to developers to designate housing units for ELI & disability populations during application for funding.

**Presenter:** Could you offer some more commentary about that?

**Comment:** The HOME program and the Housing Trust Fund program, basically we are trying to identify high opportunity areas, the affordable housing for extremely low-income individuals and that deals with 30 percent income based on the area median income. So, with the Housing Trust Fund program that is one of the things that is designated. That program only deals with the population with extremely low-income. We also have the HOME program so what we are doing is we are working with the developers, with the tax credit developers. We are using our HOME funds, HTF funds and in order for them to receive HTF funds they are asking them to devote a percentage of those development units for people with disability. We are addressing the homeless, the seriously mentally ill and this is something that goes back to our Consolidated Plan. The 15 through 19 Five-Year Consolidated Plan, so we are sort of a head of the game. We are trying to address disparities among people with disabilities and the homeless.

**Presenter:** Thank you. How do your programs distinguish persons with disabilities? How does that define?

**Comment:** We have a down payment assistance program. This is where we work with the USM, University of Southern Mississippi with the House of Your Own Program and their policies and procedures they have to actually document the people's medical conditions. I think that actually comes from the physician to show that they are disabled. Yes, that is one of our programs on this down payment assistance program.

**Presenter:** That would be HUD data doesn't actually address things like mental illness or thing. They only talk about it in terms of cognitive disabilities. So, it is a very broad category, cognitive disabilities. So, it would include those with other forms of mental impairment including mental illness.

**Comment:** We also encourage choice program as well. That is one of our rating factors as well. The HTF, Home Program as well.

Presentation

**Comment:** If I am not mistaken aren't fire alarms now required to have visual indicators? I believe that is absolutely vital for the safety of the person.

**Presenter:** That is true, both vision and auditory.

**Comment:** So, I am just making sure that all of our housing has visual indicators on the fire alarms and the other thing that would be important would be some kind of visual indicator information about other kinds of alarms like tornado warnings and things like that.

**Presenter:** Thank you very much.

Presentation

**Comment:** I know everything there is to know about having an ambulatory disability. I have MS and I use a powered wheelchair for most of my ability. I had to buy my own house and I am privileged to have a middle-class income due to private disability insurance that allowed me to buy my own house and put in a ramp, put in threshold ramps all around my house. I got some assistance from the Mississippi Paralysis Association to retrofit bathroom. It is not perfect, but it is better. My kitchen is still largely inaccessible. Unfortunately, there is nothing that I can do about that, because it is a 1941 house. I had to basically balance access to transportation and food, fresh food with the layout of the house itself. I live right across the street from a grocery store and right across the street from a pharmacy and a bus stop, which is wonderful and it allows me to live independently, but I live in a 1941 house that really can't be made fully ADA compliant. So, there you go. Hence what I think we need to do is again, target your major transit routes in your cities, build lots of accessible units, and I mean roll-in showers, not adaptable, that is not adequate. I could never live in an adaptable house given my disability and many older adults are in the same position. So, we need to be targeting the transit routes and be building lots of accessible units preparing for the day when our population gets older and lives longer. How we do that is going to take a lot of brainstorming, but we are behind the curve here and we really need to catch up.

**Presenter:** Wouldn't you actually kind of consider that day today? I mean we have many seniors have these needs today.

**Comment:** Yes. Yes. I was trying to be kind.

**Presenter:** So, we do have some issues to address. How about just general independent living challenges, persons having independent living disabilities?

Presentation

**Comment:** I have another friend who has a milder disability. She can still walk with a cane, but she is hemiparetic and she has very low-income and because of that she cannot afford the apartment complexes that exist on the transit routes. She is struggling to live independently and manages to do so, but now she has had to move to a cheaper apartment complex which is more than a mile away from the nearest transit route. So therefore, she is basically to put it bluntly under house arrest, because she can't walk that far. She just can't. So, Paratransit is not all it is cracked up to be. Paratransit is not spontaneous. It is not cheap, and this is s women who could otherwise be more engaged and

more functional and more independent, but for the lack of an affordable apartment on that transit route.

**Presenter:** Thank you for offering that commentary.

Presentation

**Comment:** Why are these meetings only focused on disability? Are there meetings focused on race, ethnicity and other protected classes?

**Presenter:** She has left.

**Comment:** Assistance levels need to be based on a lower percentage of gross monthly income, so as to reduce administrative burden and provide a better level of assistance to the disabled population.

**Presenter:** I believe I read that one already.

**Comment:** The greatest challenge to provide integration of the disabled population into the private rental market is the state's ability to provide outpatient case management. The private owners are not going to be willing to take on case management for cognitive disabilities.

**Presenter:** Anyone else?

**Comment:** I have a friend out of state, this is not in Mississippi, but out of state I have a friend with intellectual disability and she has a case worker that comes out to her integrated apartment and helps her with life skills, making sure that she is managing her finances well, seeking jobs, and things like that. So other states have case workers that go out into the community and visit people with cognitive disabilities in their homes and make sure that everything is okay and that all of their needs are being met. I don't know how we do that here in Mississippi, but obviously that is what needs to happen. The prior commentator, your comment was spot on. We can't expect landlords to do that. That is just not realistic.

**Presenter:** Thank you.

Presentation

**Comment:** I was the one that brought that up. My understanding is IRS Tax Credits do not trigger the federal guidelines for accessible housing under the rehab act. I got that directly from HUD. I did not make that up. I got that directly from HUD and because I pursued it last year and that was the answer I was given. The IRS Tax Credits given do not trigger the Rehab Act Section 504, five percent accessible unit standard. So that is very frustrating for people like me. That is very unacceptable.

**Presenter:** Thank you.

**Comment:** Yes, I believe that those with cognitive disabilities do get segregated. Mostly, the individuals will go to affordable housing which brings them to PHAs. Many of these PHAs have aged housing stock. So, funding for new accessible units is needed.

**Presenter:** Thank you.

Presentation

**Comment:** A little while ago you mentioned rural, rural transportation. I sit on the Intergovernmental Transportation Committee for MDOT and we talk a lot about rural transportation. It is obviously more

complicated and more difficult to arrange transportation in rural areas of Mississippi, because the distances are so much longer and therefore it creates more expense getting someone from their home to anything that they need to do. Obviously, the policy is to live a more compact lifestyle meaning create accessible units near shopping, medical centers, etc. So that that transportation can be done quicker, more efficient, with less expense. If we were smart and we were building small downtowns in small town Mississippi, we could create housing near those downtown centers and therefore make it more accessible for people with disabilities. That being said the only thing we can do now is fund rural public transit through MDOT. That is something for the legislature. I know that is beyond your control, but in order for people in rural areas to remain engaged and just meet their basic needs they need accessible affordable transportation.

#### Presentation

**Comment:** One of the slides that you presented listed retaliation as a contributing factor. I was wondering if you could define that word for me in the context of a contributing factor, because I am not familiar with that.

**Presenter:** Contributing that is in the fair housing complaints. HUD tracks, if you file a complaint and your landlord retaliates against you or against whoever filed the complaint that is why it is tracked. If it goes to court past HUD that will come out and that retaliation is really a huge problem. I do notice that complaint a decade ago were significantly greater than there have been recently. So, the complaint activity has fallen off. Maybe that is great that you do not have that issue anymore or is it people are not using the system anymore. That is the two issues there.

**Comment:** I hate to be the bearer of bad news, but I have a friend who is so deathly afraid of complaining to HUD about substandard housing because... by the nature of our ... (technical issues)

#### Presentation

**Comment:** It would be good to know what dollars were made available from this last year to programs for persons with disabilities, including knowing the programs funded and the current status of those programs and the number of households assisted with those dollars.

**Presenter:** I believe that information as it relates to HUD funding document is already produced in the CAPER that MDA and MHC produce each year as they report back to HUD.

**Comment:** Knowing what MDA and MHC is already doing in the state for this population so we can know what to propose they do or do more of in the future.

## 11/15/2018 Mississippi Disability and Access Workgroup

(Via Webinar)

Moderator: Rob Gaudin, Western Economic Services

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**Comment:** For a number of years folks here at our agency have worked to identify different programs that we manage to help increase the supply of affordable housing for persons with disabilities. So as we work through these programs and some of these initiatives, you know they take some time and we have made some progress and we hope to do more and so the more information and suggestions we receive from our stakeholders such as the folks that are on this call those are the types of things we need that can help us reach our goals more quickly.

**Presenter:** Aside from the Home Corp are there activities the entitlement, regional PHAs, or local PHAs can do to enhance the housing shortage for persons with disabilities?

**Comment:** I am talking in regard to the programs that we offer here at MHC. Again, I think we talked about this once before, but I just want to reiterate that we have initiatives set aside for developers for whenever they are applying for HOME funds and the housing Trust Fund. We are asking them to set aside at least 20 percent of their units for people with special needs, people with disability. So that is one initiative we have already, and it is working now for us and it has increased the housing for people with disabilities. We also offer a mixed income financing actual to have HOME funds and HTL funds to be used together. We are reaching out to non-profits and housing authorities.

**Presenter:** When you say reaching out to housing authorities, could you describe that?

**Comment:** When we say reaching out, we are allowing them to come in apply for some of these HOME funds and HTL funds from a competitive standpoint.

**Presenter:** How many have been successful so far?

**Comment:** In 2016/2017, the applications we received about eight applications which they were required to set aside these funds for housing for people with disabilities and for 2018 we have about on the HOME side, we have received seven applications and on the HTL, I think it is eight applications we have received. So, we will increase housing for people with disabilities.

**Presenter:** I am assuming that the entitlements can also do this?

**Comment:** Yes, they did not have to be, they come in for-profit or for non-profit. Under our entitlement we are actually looking at our down payment assistance program that we do have set aside for people with disability and that is with her and our rehab program. So, we also receive I guess an application a week for rehab or to do reconstruction for people with disabilities. In some cases, it or not just geared toward our rehab program for people with disability but we do actually reconstruct and rehabilitate homes for people with disabilities.

**Presenter:** Thank you very much for that. The entitlement and the PHAs without your help from the Home Corp can they do something on their own. We are only talking about persons with disabilities who face housing shortages. There are other topics that we will be addressing here as well. So, my question is can the entitlements and the PHAs do something on their own? I will take that as a no. Really all this activity is coming from the Home Corp.

Presentation

**Comment:** As I recall she had a question regarding HOYO funding for disabled persons she wanted us to address in Hattiesburg on the 4<sup>th</sup> of December and we will have some information for her at that time, but if we could get her to unmute herself or send you a question that would be helpful, because she is a real expert in this field.

**Presenter:** She is now unmuted. Would you care to comment? We must be having some technical difficulties.

**Comment:** She has that expertise as well.

**Comment:** I wrote in a question concerning MHC funding for the HOYO program and I was just wondering if that has been addressed. I have been having a hard time getting onto the webinar. As you well know HOYO was started in 1997 and I was a part of the process at that time. It is one of the top 100 programs in the country as awarded years ago. I am just a little bit concerned they have such limited availability for safe, affordable housing for people with disabilities which I am one 34 soon the 35 disabled and I have worked in these field for many years and that is the one problem that we have had in the State of Mississippi is getting people out of the institutions, group homes, etc. and getting them into the community. The lack of safe affordable housing, but with MHC help with HOYO program they have put over 500 people in housing in the community. I was just wondering if you all have addressed the process and when if any will they receive funding from MHC in the near future?

**Presenter:** Would someone at MHC be able to address that?

**Comment:** We are in the process of working with others to go over our policies and procedures to make sure that we have everything in order. Once we do that, we will release funds. They have funds for 2015 and 2016 and also 2018. There is one million dollars that HOYO has to work with affordable housing.

**Comment:** Do you have any timeframe on when that might be put in place?

**Comment:** We plan to get it started before the end of the year. So, we are working on it and we are making sure that we are in compliance with everything and so as soon as we get that done, we will start that and it will be before December 31<sup>st</sup>.

**Comment:** Great. That is wonderful news. I hope that works out that way. Thank you so much.

**Comment:** You are welcome.

Presentation

**Comment:** I wanted to let you know that she had family emergency and that is why she could not speak. However, they are working with us to complete the policies and procedures so that we proceed. However, it is of urgency because the University shuts down and we do thank them for their working with us and we do anticipate getting funds. We just don't know when.

**Presenter:** Thank you. Based on one of the comments we have received in one of our previous work sessions was a call to building inspectors perhaps by saying they are not quite doing the job that they need to do. What do you think we could do about this?

**Comment:** What type of enforcement is there in place currently if the building inspectors are not doing their job as far as inspecting new buildings, new housing?

**Presenter:** I can't answer that.

**Comment:** Was there anything more specific to that particular question? In what regard were the building inspectors unable to do their job? Were they not trained well, or they are not able to identify problems in a timely or accurate manner? I guess if you do not know the answer to that I would like to follow up by saying if there does seem and I can seem to recall that we had a building inspector problem in the past and I don't think it was related to disability housing or housing for the disabled, but I do recall their being training issues. That might be something that we could look at here is trying to coordinate some effective training for building inspectors that inspect units for the disabled, but more specifically we need to find out what those shortcomings are.

**Presenter:** Based on my experience sometimes one inspector will take a look at the fixtures in the bathroom and so on and how wide the doors are and someone else might look around for access to the building from outside. Now the communication between those two sometimes is not as good as it should be, because maybe the particular units has got a half a flight of stairs and the stairs are built to code and everything looks good. Then the next guy comes, but the first guy did not think about the individual might have some ambulatory problem. So, there are challenges with communication amongst the building inspector, excuse me inspectors, and in particular when constructing units with ADA guidelines they may not be as educated as they could be or should be. So, from my experience some issues that come along there.

**Comment:** That was one of my issues years ago when I was working in the field. There was no enforcement of the building codes and things would be passed as ADA compliant which when you looked or scratched the surface whether it be access, whether it be parking, or it be entrance way it was not ADA compliant. I haven't been in the field for a few years to look and see if any of that has been improved, but unless there is some type of residential reinforcement, I doubt very seriously it has because there is no incentive to do that. If they get passed and it is done, unless somebody complains, or somebody has an issue and brings up and files a complaint it just goes unnoticed.

**Presenter:** Thank you. Then it is my understanding that we might wish to take a look at what is going on in the field currently and whether the communication is occurring across building inspectors as well whether they are being ADA compliant particular with new construction.

**Comment:** That is correct and let me ask you a question does not the architectural organization that is responsible for building etc. in the State of Mississippi have to accept and adopt the ADA code or not?

**Presenter:** It is my understanding that ADA code is standard now, but I think your point people are overlooking some of those or they may be overlooking some of those. The question of course is if they overlook it, they are liable for the outcome. If they do it deliberately, they are also in trouble. I believe you are correct that we should have some follow up to this new construction to make and verify that ADA compliance has been fulfilled. I guess that is my conclusion from this discussion on building code enforcement.

**Comment:** Yes, sir.

Presentation

**Comment:** I was going to come in on the previous slide when you were talking about the compliance issue. As HOME funds, HTL funds, tax credit we do have to enforce the building codes as inspectors and based on the requirement we have to go out every so often to inspect the projects after completion. I do agree that maybe we could offer some type of training specific to building codes dealing with ADA in the 504.

**Presenter:** Thus far we have pretty much turned our attention to Home Corp as the entity that can do anything. We haven't been able to talk about entitlements or the regional PHAs or local PHAs that might be able to do things, but again it would be through Home Corp. It that the recollection you are getting form this discussion as well?

**Comment:** We all work together for the same goal, but and I am asking this question personally. The housing authorities across the state from what I understand have a lot of authority and I think they can actually issue their own bonds. So maybe there is some things that they can look at aside from the funding that we have available or when funding is not available that they could look at to enhance some of these affordable housing opportunities for disabled persons in other areas. I wouldn't know the answer to that, but I guess I am throwing that out there to see if anyone does.

**Presenter:** Does anyone wish to comment about what he suggested here?

Presentation

**Comment:** In Mississippi, we have some area that do prioritize people with disabilities and others that just refuse and those seem to be the more highly populated groups that don't and it would certainly I would just suggest that they would reconsider that. That is a large group of people with a very limited income that are trying to reenter a community and live independently with their disability and it makes it a lot easier when they are put on the top of the priority list.

Presentation

**Comment:** Our agency has a B2I preference for those who are in group homes.

**Presenter:** Can you talk about that a little bit more? Rent controlled units. It doesn't seem like this is such a popular idea. So far rent control has fallen out of favor. So, this will not be a part of the recommendations.

Presentation

**Comment:**

**Presenter:** I have a question for you. In the programs that you have been talking about is there a mechanism that might provide persons with disabilities some assistance with purchasing a home or some credit deal if you will?

**Comment:** Well the down payment assistance program those are set aside funds with the HOYO program I was telling you about earlier. It doesn't really deal with their credit, but the funds that we provide actually allow them to use the money as down payment assistance to make the house more affordable for people with disabilities and we put in subsidy layers, underwriting standards that we put in right now so that we don't actually provide more money than necessary, but that is basically it when it come to our underwriting standards. We do not take into consideration their credit.

**Comment:** As a housing council agency what we do under the Home of Your Own program we do work one on one with those families that have the limited credit and whether they have a disability of not you have a lot of people that have limited credit because their income and some because they don't have the understanding to understand some credit and that is why we offer the homebuyer education and resources so that they can learn how to manage their money so that they can obtain credit the right way.

**Presenter:** Thank you. It does not seem like there is a specific program designed to assist persons with disabilities and further subsidize them. It is specific to someone with disabilities.

**Comment:** Those are considered set aside funds.

**Presenter:** Thank you.

Presentation

**Comment:** There are several agencies who have the preference to help get those who are in group homes out. We give a special preference to those individuals moving them to the top of the waiting list.

**Presenter:** NIMBYism is a problem for group home siting. I think we can all probably agree that enhancing outreach to the local citizens in a particular community about the issue of NIMBYism but what else can we do besides enhancing their education for this? Is there anything here and these issues and some of which have fallen flat, but I have pulled these from the conversations who have shared with us previously, but we are at this point now where we are winding this down. So, I need to ask you if there is anything else that has been overlooked. We have had more housing for disabled persons, persons with disabilities, enhancing the credit or ability to acquire. We have talked about building codes inspections and ADA compliance. So really have we covered it all or is there something else?

**Comment:** I think we need to go back to the rent control. I think we need to discuss that. I do think that should be and with this new housing production program with the Housing Trust Fund, now they encourage that money to go into rental property for people with disability and they do have income restriction that they cannot exceed 30 percent of that person's income and that would think apply to persons with disabilities. I just think that should have been mentioned and that would, and so to answer the question about rent control units that was a part of the and actually objective of Housing Trust Fund. So, for people with disability or people with extremely low-income and the people with disability most likely fall into that category.

**Presenter:** Thank you.

**Comment:** That is basically the same thing that I was going to bring up and also to touch on the private sector building apartment complexes and being in compliant with so many units being accessible. That can be an increase in housing in general for people with disabilities.

**Presenter:** Thank you.

**Comment:** I was just hoping that the rent control was not going to fall flat and not be looked into further.

**Presenter:** I am glad that you said that. What I am talking away from this narrative is that most of the activities are going to be coordinated through the Home Corp and not so much the entitlements or the local PHAs. If the regional PHAs are able to get their bonding capacity in play they might have the ability to do something and I think that is something that we should look into. My firm will look into that to see if they do, but essentially most of the activities needs to be coordinated through Mississippi Home Corp. Is that your understanding as well?

Presentation

**Comment:** I wanted to comment on group homes. I don't think it's an issue in Jackson with NIMBYism, but more an issue with ensuring that group homes are regulated and inspected. A few years ago,

there was a woman that froze to death in a group home. The State issues licenses for them, but no one is taking oversight responsibility. I also feel that rent control is a good idea, but not just for the disabled. Often annual rents in Jackson far exceed 30% of the AMI for Jackson.

#### Presentation

**Comment:** I just wanted to mention one thing and I think she spoke about this. I understand that the funding for HOYO is in the process and that they are checking up their paperwork, etc. but just reminding them that USM will be shutting down and I don't know what the exact date is but maybe the 15<sup>th</sup> and not to be opened up till after January. So, I don't know if that plays into it. I don't know if HOYO has to do anything or whatever. I just wanted to mention that and bring it to the forefront again.

**Comment:** I was saying that was just an estimated date that I throw out there, but we have made tremendous progress on this. We will get it going before the holiday.

**Comment:** Our Family Self Sufficiency Counselors continue to comment on the need for more things to overcome transportation issues. Clients number one need after securing housing is transportation so that they can seek employment.

**12/5/18 - Biloxi Fair Housing Forum  
City of Biloxi Guich Community Center**

(Regional meeting hosted by the City of Biloxi and the Biloxi Housing Authority; participants included: the City of Gulfport, MS Housing Authority Region VIII, Bay Waveland Housing Authority, Moore Community House, MS Center for Justice, and other participants from the community listed below)

Moderator: Rob Gaudin, Western Economic Services; Sign-in sheet attached:

GULF COAST ENTITLEMENTS/PHA'S  
CITY OF BILOXI/CITY OF GULFPORT/CITY OF MOSS POINT/CITY OF PASCAGOULA/BILOXI HOUSING AUTHORITY/ MS  
REGIONAL HOUSING AUTHORITY VIII AND BAY-WAVELAND HOUSING AUTHORITY  
ANALYSIS OF IMPEDIMENTS PUBLIC INPUT MEETING  
10:00 AM WEDNESDAY, DECEMBER 5, 2018

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## Presentation

**Comment:** You said to make comments on fair housing complaints. What I hear from our tenants is that they call HUD and they get nowhere or they call the 1-800 number and they get no response. That is what I hear a lot of (Not Discernable) the other thing is transportation. We have no public transportation of any kind for our elderly and disabled in Hancock County in the Bay St. Louis area. I have tried reaching out to senior centers and most of the time basically the answer I get is unless they are involved with the senior center they don't have anything. That is one of the problems with transportation with the seniors is to get them to their appointments, their doctors, or grocery store and things they need. There is absolutely no transportation whatsoever.

**Presenter:** Thank you. Anyone else?

**Comment:** The issue that I feel is a lot is the wait time. I work at the Domestic Violence Shelter as a case manager and they will apply online for housing and then they get that first initial letter and then nothing. Crickets. Their time and shelter is limited and our goal is to transition them from shelter into their own place, but six months pass by and they are still told you are on the list. They can't even give us an estimated time. I witnessed one apartment being built over the years through Biloxi Housing and the was the (Not Discernable) but I think we need more housing to accommodate people to help them get off this list. It shouldn't take six months to a year to just get an apartment.

**Comment:** I totally disagree. I think we are oversaturated with tax credit properties, low-income apartments, Section 8. We have since Katrina and abundance and overflow of building low-income housing. It is there. They are all over. You are only going for Section 8 then yes you will be on the waiting list. There are plenty of low-income though.

**Presenter:** We have a disagreement. I am actually glad to hear that.

**Comment:** These are not just low-income. They are income based. There is tax credits and that is not what I am talking about. What I am talking about Biloxi Housing and getting into project based. I know what she is talking about, but again my clients have been on the list six months to a year. We are still waiting to hear back from Biloxi Housing.

**Comment:** You are dealing with people coming out of a shelter, you are dealing with only one person. I know today we have an abundance of people already on the waiting list for one-bedroom units. We just don't have them available. Those are things we could probably talk about moving forward and how you address that, but currently the rules and regulation that relates to project based vouchers is that if a family goes into a unit they must qualify for the size unit that they go into and so you can't put a one bedroom family in a two bedroom unit. It doesn't allow it.

**Comment:** The other thing is the reason we can't tell people and I would say any housing authority for the most part exactly what your wait time is because when people apply there is a system of priorities. You might be number 10 on the list, but somebody might apply and have more priority points and get a head of you. We don't know how many units are coming available from who is moving out. So we may have nobody move out of a one bedroom for six months so you may sit on that one bedroom list for a very long time and in that time that you are waiting to get to the top of the list somebody might jump an ahead of you. It is almost impossible to tell somebody exactly when a unit that they may qualify for will become available until they get to the top of the list.

**Comment:** I understand that, but the problem is waiting. Yes, it is a single lady, or it is a lady with one child. Again, I know the point system. You get points for being disabled. You get points for income and

having children and moving here from a natural disaster. I get the point system, but at the same time it is not fair.

**Comment:** I understand the frustration, but I promise you that there is a lot of people that are waiting.

**Comment:** I know.

**Comment:** You when you do your first draft on January 31<sup>st</sup> have you heard this discussion that it will be part of the impediments?

**Presenter:** Of the first draft identifies the fair housing issues that will include those impediments to fair housing choice.

**Comment:** Which has been discussed here today?

**Presenter:** Yes, and those and that I have discussed and that we have heard.

**Comment:** Region VIII is saying that there are many people, do you have a number on what Region VIII looks like on the list? What does that number look like?

**Comment:** As it relates to?

**Comment:** You said you had many people on the list. What number are we talking about? A range? Anyone has a range?

**Comment:** It depends on where you are located.

**Comment:** Okay, let's say I am from Gulfport.

**Comment:** You are from Gulfport. It is extremely difficult to get you into a one-bedroom unit. I can't tell you. We have several problems in that area. (Not Discernable)

**Comment:** Also, there is a (Not Discernable) project. Is that in this draft?

**Comment:** No, I don't think that is in there. We are in the process of trying to redevelop our part. That is the process of dealing with HUD and it is preliminary, once it is approved but it is in the process. That would more than likely alleviate some people in Gulfport, actually the people who are there now are going to get first priority and then we will accommodate everyone else as they qualify.

**Comment:** You gave your discussion that says you have an impediment time to get through HUD to get that project off. What is the proposed number of units?

**Comment:** We are talking about 80 units. About 42 public housing, 37 project vouchers, and I believe regular tax credit based.

**Comment:** Your biggest impediment with HUD is time or more information.

**Comment:** It is more information.

**Comment:** Thank you.

**Presenter:** Another comment.

**Comment:** It seems to me that one of the basic issues is having a living wage job. Everything is impacted by that. It doesn't seem that we have enough living wage jobs in our area that people can

support renting a house that is livable. We have a lot of rentals, private rentals that really are not livable and we have no control over that since there are private homes. We have had a lot of new apartments and a lot of new things coming up, but we also had an addition of people moving here for other places that do not know the system. They don't know to go here for rentals. They come to different ones of our agencies to try to get help. So especially in east Biloxi transit community rentals may open up or the private rentals they may close and there is no way to control all of that. So, we see a tremendous in east Biloxi and part of west Biloxi a very (Not Discernable) community and it affects the ability for Section 8 and Section 8 is very strict about fixing up houses for people to move in and our agency deals with that all the time. I mean it is a very good practice to do, but in the private housing market that doesn't happen. People move into houses that are decrepitude and I don't know if there is any agency, we go through the lawyers, we go through everything. We even have a person in our organization that does nothing but rentals to go to the different rental agencies to check out what the problems are and try to lower the rent for low-income people. Everybody in here, we probably all know each other, and it is the same problems no matter where we go. We have a good legal aid society and everything and everybody works together, but we can't control what the private rental market does.

**Presenter:** Would you like to suggest ways to control the private market?

**Comment:** I would have to think about it. (Not Discernable)

**Comment:** Following up on your point on living wage. When we think about living wage and how to access a higher wage, we look at the where are job centers. Where is our job center? It is on Seaway Road which has zero access to public transportation. Following that also out there is the social security administration, the department of Human Services, and in addition the DMV, one on Highway 67, all inaccessible to public transportation. If we want our families to move forward proximity, we want our cities to invest in proximity. The MIT living wage calculator estimates that a one parent, one child household will spend \$8,000 on transportation alone in one year. How do we expect our families that are under the federal poverty level to spend that much on transportation just to access a simple thing as a driver's license which is a barrier to employment and child care operating hours are limited which limits parents who are single, single parent household from accessing childcare then getting to work and though we even have public transportation in Harrison County and both here in Biloxi, access childcare and then getting to your job in a timely fashion is still a barrier. Basically, having single parent households where they don't have resources, where they don't have flexible employers who understand that they are the sole person, the caregiver for the child. So, I have a lot of things to say, but I think that all of that makes my point that transportation is reliable and affordable is something that should be visited if they really want citizens to be able to work.

**Presenter:** Thank you.

**Comment:** I will say at least from our housing authority perspective one of the biggest barriers to getting into affordable housing is the deposits that are required to move in. We often times call people that are eligible on our list and they don't have funds to turn on the power, the water, the gas, the cable, or whatever it is that they need, plus their deposit. So, you need \$750 probably. Water is 200 if you have to turn on the water, power, you are looking at about 700 dollars and even at this time of the year we have units ready, but we call people to say that you are on the top of the list and they say I can't, I don't have the money. That is something that we looked at a thousand different ways to try to remedy, but it is something that I don't know how people handle it nationally, but there is a lot of talk about that. Some places finance it. Some places try to do, but you have to be able to do it for everybody. You can't just offer some people assistance and some people not. We can't give people money to turn on the water or the power. I just bring that up as something that I think is our most difficult task to getting people who are eligible into our housing.

**Comment:** The Mississippi Home Corporation, the state's housing finance agency have worked closely with the Mississippi Development Authority and all of the partners statewide and we hired him to help us do this statewide analysis. As it relates to folks putting a deposit down for public housing typically what would that amount be?

**Comment:** It depends on the authority. Ours is 200. It would depend on I don't know... I think we are on the low end of the deposits.

**Comment:** Ours is 200.

**Comment:** I guess we are all about the same rate. I think it is as or more expensive to turn on the water and the electric...

**Comment:** Mississippi Power is 30 now.

**Comment:** What are the reasons the deposits are so high whether it is for utilities or for the apartment. It is because people do not pay their bills or people destroy our properties. That is why we have to charge a deposit for the apartments because either they skip out on us or they destroy the apartments. You have electricity or water and I understand that they went up after Katrina because so many people had to move. So bills weren't paid, but if people would pay their bills and prioritize what needs to be paid first and take care of the roof over your head and take care of your food, take care of your electricity and your water, you worry about your nails and your cell phone later. People would pay their bills and our deposits would not need to be so high.

**Comment:** Utility deposits, in terms of the average monthly bill, what typically is not terrifically high. Our water bill, it is unusually for it to be more than \$50 a month unless you have leaking pipes and are filling a swimming pool. I don't know what it is.

**Comment:** Mine is 75.

(Crosstalk)

**Comment:** Last time and I haven't moved in a long time, so I haven't looked at it and when I did it was \$200 which is absurd and people need to pay their bills. The public utility can terminate, and it doesn't take four months if the bill isn't and they don't, they can turn your water off after a month if you are late. There is no need to have a disproportionate high deposit. It is a barrier.

**Comment:** The water companies will give you that after a year or two will refund that bill, Mississippi Power will do that and so will...

**Comment:** After a year in, it is the barrier to entry that is the problem.

**Comment:** Can I find this PowerPoint online anywhere?

**Comment:** Yes sir, you can. You can visit our website [www.mshc.com](http://www.mshc.com). We have all of the fair housing surveys and we have a list of all the community input meeting statewide. We are doing 58. There are 58 different groups collaborating together, like Region VIII, Biloxi, Waveland, City of Gulfport and city of Biloxi. When we move over to Moss Point tomorrow, it will be Moss Point and Pascagoula. Then throughout the state it will be the same thing elsewhere.

**Presenter:** I have a clarification. Do you want this presentation, or do you want presentations for each of the 58 participants?

**Comment:** I am from Biloxi and I would be particularly interested in Biloxi, but also this region in this area.

**Presenter:** Biloxi, itself every one of these has a Citizen Engagement Toolbox, which is a presentation similar to this but tailored to that individual community. It also has a Discussion Guide which includes a lot of tables of data and some other maps and some other information like on the lending records and various building permit records and various other things. So, to encourage discussion. Every one of the 58 partners has one of these individual.

**Comment:** What I am primarily interested in is City of Biloxi compared to this district Region compared to the Southeast, whatever...

**Presenter:** Region VIII.

**Comment:** Then compared to the national figures.

**Presenter:** You can compare Biloxi to the Region. You just need to download those two; we also have one for the State. So, you can download those three. They are just pdfs.

**Comment:** I am just addressing the point a few minutes ago about the lack of transport to the social security, the job center, and the driver's license agencies. It seems to me that it would be very simple for the Federal Government who gives grants to each of these cities for public transportation to condition their transportation grant on their being bus route to these institutions. You are not going to have adequate minimum wage if people cannot get job training and they are not going to be able to get job training if you put it some place where there are no bus lines. They are problems with their social security, and they are not going to be able to get there on public transportation. That is what was pointed out and they don't have a driver's license and they can't get to the driver's license station. It is all connected. (Not Discernable) I don't know who the decision maker is, but the places these services where there is none, but it sounds like they and it would be very simple for the federal government to just make a rule saying no transportation subsidies unless you locate these on a bus line. That wouldn't cost the federal government anything to, but it might cost the city a little money to run a bus. It shouldn't be that difficult.

**Comment:** I can testify to what you are saying. I frequently go back on Seaway Road and doing different kind of work and the number of people who are walking to get to the job center, and it is just appalling. I pick them up and sometimes I get three or four people in my jeep getting to the job center in the heat of the day. Everything is moved to Seaway Road. Everything. If you live in Biloxi, if you live in Gulfport, nothing is available for people. I think about east Biloxi, there is not even a grocery store. I know the population won't support it, but people who are minimum wage have to pay people to take them to Walmart or to the grocery store or across the bridge. The problem with our poverty is just as much about accessibility to services as it is about income. You have to pay people or pay a taxi to take you.

**Comment:** Maintaining those assistance programs mean multiple trips. It means daily, but if not daily, but weekly or monthly figuring out how am I going to get there today and at the right time and if I am not there at the right time I can lose my assistance. Really after researching and looking at our infrastructure and looking at what other cities and other models have done short of giving everyone a car or building more transportation routes the solution would be proximity. Proximity closer. The shorter the distance between theses assistance programs the less one would have to travel making them accessible by walking or biking. Keeping those cost low and as we all know, we all pay insurance, driver's license and registration, vehicle maintenance. Transportation is such a complex barrier that it

is and of course I understand that it is difficult to address however like I said placing those services completely out of the way of families.

**Comment:** It was done a while ago. The FEMA money given to them after Katrina stated that it had to be built a certain distance away from the coast so it wouldn't get flooded, so we wouldn't have to rebuild from the next hurricane.

**Comment:** Well it is far down.

**Comment:** It is, but you can also go to the kiosk in the courthouse and get your driver's license renewed there. Not every time but every couple of years.

**Comment:** It has been breaking for a couple of years.

**Comment:** We work with a lot of women who don't even have a driver's license. Who never had the privilege of someone who has a license and an insured car to teach them how to drive? That is a huge barrier to obtaining that license which is the first step to jobs and getting one. So from our perspective just having that and I have just gone out to purchase the information booklet so they can even take the test, the permit test, but even going through and getting your license that is a huge barrier, huge task, huge financial burden to say a non-profit to help an individual to get a license. We have to also provide insurance. Again, complex barriers.

**Comment:** You are you with?

**Comment:** Moore Community House.

**Comment:** I was going to ask you about mortgage turndown rates. I heard you say that they are double, 31 percent of black minority verses 17 percent for white. I guess my question regarding that it is a huge discrepancy. Are those turndown rates for those who otherwise would be entitled for a mortgage or are those turndown rates because people are not qualified?

**Presenter:** If you talk to the lenders, they will say people are not qualified, but the persistence of it across every jurisdiction I have ever done this for, minorities' particular blacks and Hispanics have a very high denial rate compared to whites. So, the question becomes why is this happening? Is it the neighborhood they want to live in and does that mean that they were redlined or steered that way and all of them are going this way? There are several questions when you begin to kind of tease out what the information is.

**Comment:** It seems like the problem the government is interested in solving (Not Discernable) I could say they are not qualified, but you have to look at the application to determine that.

**Presenter:** We don't have all of the information in the Home Mortgage Disclosure Act data. We do not for example have their credit rating. We have these reasons why they were denied if the banker wants to say them. Other than that we don't.

**Comment:** What reason did they give?

**Presenter:** Most frequently it is credit history, but employment history is also a problem, loan to equity.

**Comment:** One of the big problems with a non-profit is we a consortium for HOME funds, but those HOME funds are not readily available for Biloxi. What we are finding more and more houses that are for sale now. We have an aging population on the Southside where the homeowners are retiring, and they are putting their houses for sale and some of those are between 80 and 100,000 dollars. If we

had better organization of the HOME funds and had more HOME funds, we could certainly get people into those homes. Now we have a whole system of helping people in the non-profit sector, but there is just not money available to help people get into these houses. If all of us help them improve their credit and financial literacy. Most all of the non-profits do this, but ultimately, we can't get them in a house because we don't have enough funds. Most all of us know each other and we know what kind of work that we do and we do communicate.

**Comment:** What HOME funds are you referring to?

**Comment:** HOME funds?

**Comment:** The HOME funds, the HOME program funds for... for what activity specifically?

**Comment:** Homebuyer.

**Comment:** Homebuyer purchase. Thank you.

**Comment:** I perceive this as a problem. Recently I helped someone file a fair housing complaint and I am here so and this happened in Gulfport. So, I bring it up, but I do think that it is an obstacle to fair housing. The city zoning code which is based on the international property maintenance code so I assume this is not solely a Gulfport problem, says that if you have an inoperable vehicle you can't, you can store it if you have a garage, but if you don't have a garage and, most of the low-income housing in Mississippi do not have a garage, you can store it on your property for up to 30 days. At that point zoning enforcement will come out and cite you. Poor people frequently have inoperable cars and they usually don't have a lot of extra income so getting the money to fix them can be time consuming. So, but if you don't fix them within 30 days you get cited and you either have to fix it or you have to pay someone to tow it away or pay for storage or have it jumped. As a particular matter you have a house and you have a driveway and you have a car in your driveway that is inoperable, some of them they talk in the ordinance about states of disassembly and see where that might be a concern for the neighborhood on an ascetic level, but if you have a car that is inoperable it might look no different or better than the little old lady down the street who car sits in her driveway and she drives it to church once a day. There is no difference. Yet you get cited if your car gets towed and the city assesses a fine when you get your car towed not to mention the hidden towing fee and the storage fee from the towing company. You can't pay it then they enroll it as a tax lien against your property and your house all because you do not have enough money to repair your car in 30 days. When we look at the statistics 70 percent of these citations were in minority neighborhoods. So, people are losing their houses in Gulfport and I assumed elsewhere along the coast simply because they do not have discretionary income to repair their car in 30 days. I mean it is absurd and I understand that you don't want people to have junkyards in residential neighborhoods and their yards full of disabled vehicles. That could easily be addressed by saying that you cannot store more than one inoperable vehicle.

**Comment:** I am going to give you my card. This is something I definitely want to discuss with you. I want to look at the statistics you have in these minority communities and I assure you that I will get some answers.

**Comment:** That would be...

**Comment:** I don't know you or if you have a card. But if this is happening in more frequently that you have been able to find cases on I will review this.

**Comment:** I will forward all the information.

**Comment:** I appreciate that and I thank you very much.

**Comment:** To the Transit Authority I have spoken with them about Seaway Road and they used to have a route in and they said that the numbers, the riders were not there and so they discontinued the route. I understand from a transportation provider's perspective not having the numbers would lead to discontinuation of a route, but in the big picture just as they said it is all interconnected. If the federal government is going to invest in public housing, in public transportation, and these assistance programs and just general services at the social security administration then why not make it thoughtful and truly useable for someone who is trying to use public transportation to get there. There are wait times and there are transfer times and align those with when the services are actually available making the appointment times and the transit times match each other so that appointments will not be missed as a bus is missed or as a bus won't even align with that time. So that is what I am working with CTA on is getting the case managers and the services on Seaway Road connected on a feasible bus time to allow for that transit time because public transportation is not, it is fallible, but if we prepare for those wait times and move forward. Again, like you said just planning both services, housing, transportation and they are already making these investment and being thoughtful in using services.

**Comment:** When it comes to the job center, I have issues with it on industrial Seaway. You have to understand that moving it out of velocity zone is a good thing, but it didn't have to go to industrial Seaway. There are other zones that it could have gone in. You have to understand in Gulfport we are rebuilding million-dollar homes and we will get a seven year tax abatement. What FEMA required was that you will build it stronger and better and the job center could have done the same thing. They didn't have to be in an area that is so isolating as well as you are trying to get to other services that was a political move. I believe it was a political move, but they are going to have to have satellites that are going to have to come back in the community. Therefore, the goals that MDA and the goals that is HUD housing is make some requirements of them because those services are necessary to complete a complete picture to help the poor. We could sit here and I don't see anybody taking minutes. Oh, I see the tape, but can you hear me. The thing that you have to understand is I have done this work for 20 years and I have heard these complaints 20 years and they need to be addressed. That is all. They need to be address. As we are trying to say do better, achieve better and I hate that they lady who left who was talking about hair and nails, that is not the group of people that we are talking about. You should not label the poor with a group of people that is irresponsible. It is so important to understand that if we are going to do this comprehensively that we can teach people to manage housing to improve housing, to be a good steward of their housing. To also learn what financial budgets mean and that they have to stay in classes to understand, because what we are doing is we are trying to create legacy that will not stay in the system that is very broken, which is the children. Thank you.

**Presenter:** Thank you.

**Comment:** I was one of those women that were walking Seaway with children and practically everywhere and the bus times and everything. My thing was I had to go to three different locations walking and picking up my children and at the shelter, the domestic violence shelter, there is a curfew. So sometimes we would not get there on time and it is against us. It is a lot of things that actually have to take place here because there is a lot of people out there walking with their children at night and it is not safe. People are texting and driving so they are not really paying attention so you are trying to keep your children safe and another thing it seems like every time someone is trying to come up you are thrown at with having to pay more on rent. For instance in I just got a job, I am stable and going to school now and I got a paper saying that my rent went up because the rent went up in the complex and once you finally become finically stable you get off the system so you don't have that assistance anymore. To me it is unfair that you do have some women that pay like 5 dollars, 70 dollars or whatever

in rent and housing and then you have these people here by themselves trying to get out of housing, but our rent is going up so it is like we have to stay stuck there because we can't move onto anything bigger because we have to pay this much rent for this same apartment and I have been three for two years. It seems like we are just stuck there in housing because anytime you come in with your wage increase there are other things that we have to pay for, we pay for our food, we pay for transportation for our children, childcare, and all of this stuff, but then if we come up our rent goes up so that keeps us there and I know there is Section 8 or whatever, but Section 8 takes forever. I haven't heard from them and I applied for that when I was in the shelter and I still have yet to hear from them. I heard from public housing before I heard from Section 8. I hear stories all the time where there is women who don't make as much as me or their income and they are in Section 8 and their housing and they are living this life, but you have the ones that are actually doing something living in public housing and paying more rent than a person would pay in Section 8. Something is just not right there.

**Comment:** I would like to say that I get tired of meetings like this and I get tired of data and statistics. We have done these things 100 times in so many years and we never see any action. We need to get something done. I mean every one of us knows each other in some way and we work tighter. It is really depressing when you work to try to help people and you don't see any way that you can get them out of their situation; like this young lady said this situation of this young lady is multiplied by these statistics. It is to just one person with a problem, it is a systemic problem. We don't really have to power as citizens to change that especially with the administration of the country that we have now. We know how people are suffering and you can say it was housing authority that did that and a housing authority that did that, sure we all make mistakes but they are doing the very best that they can with what they have. It is a national problem, it is not just here. We have to handle (Not Discernable) I am preaching I know, but I believe that everybody believes in what I am saying.

**Presenter:** Preaching to the choir.

**Comment:** I did check the City of Gulfport and they said that new service deposit is \$50 with a \$40 connection fee.

**Comment:** That is too high.

**Comment:** I would like to clarify question one that financial institutions were not providing reasons on some of the application. Maybe that is to the survey, but regulatory requirements are that they do provide reason as to why they were denied. So, it is not just because of credit, limited credit, derogatory credit, or something that has happened to their credit. It cannot deny you where you are going to buy a home. Location should not have anything to do with reasons. So, they can deny you for a down payment. They can deny you for equity or loan to value ratio, debt to income ration, quality of your credit or your credit scores. So, the reason is going to be pretty specific regardless of the type of application you are going to be required by the institution and other regulatory agencies to provided that with specific reasons as to why they are being declined. If you have a bank that is really trying at assist you then they should be able to point out to you what you could do to clear up those discrepancies so that you can qualify. It is required that they tell you why you have been denied and where you are buying the house at has nothing to do with it. If you make a comment about down payment assistance, I do think that you need to make sure that all areas especially on Census tract have information to where they can qualify for homebuyer assistance. I know a lot of places they talk to the individual about down payment assistance and some have the credit to where they give you closing cost with down payment assistance. Individuals should inquire with their banks about housing funding.

**Biloxi Community Engagement Toolbox Blended Presentation - May 22, 2019**  
**Biloxi Community Development Department Auditorium**

(Regional meeting hosted by the City of Biloxi and the Biloxi Housing Authority; participants included: the City of Gulfport, MS Housing Authority Region VIII, Bay Waveland Housing Authority, Moore Community House, MS Center for Justice, and other participants from the community listed below)

Moderator: Rob Gaudin, Western Economic Services; Sign-in sheet attached:

GULF COAST ENTITLEMENTS/PHA'S  
 CITY OF BILOXI/CITY OF GULFPORT/CITY OF MOSS POINT/CITY OF PASCAGOULA/BILOXI HOUSING AUTHORITY/MS  
 REGIONAL HOUSING AUTHORITY VIII AND BAY-WAVELAND HOUSING AUTHORITY  
 ANALYSIS OF IMPEDIMENTS PUBLIC INPUT MEETING  
 4:00 PM WEDNESDAY, MAY 22, 2019

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GULF COAST ENTITLEMENTS/PHA'S  
 CITY OF BILOXI/CITY OF GULFPORT/CITY OF MOSS POINT/CITY OF PASCAGOULA/ BILOXI HOUSING AUTHORITY/ MS  
 REGIONAL HOUSING AUTHORITY VIII AND BAY-WAVELAND HOUSING AUTHORITY  
 ANALYSIS OF IMPEDIMENTS PUBLIC INPUT MEETING  
 4:00 PM WEDNESDAY, MAY 22, 2019

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## Presentation

**Comment:** My question relates to the first slide. I didn't realize that we could ask at any point in time. I apologize. On your dissimilarity index you talk about the differences on measuring on tract or block. My first question is a tract bigger than a block or is a block bigger than a tract?

**Presenter:** A tract is smaller.

**Comment:** OK.

**Presenter:** The index you are referring to is highly sensitive to the geographic area and you will get a different value if you use blocks or tracts or counties. So whatever method you use must be the same across the board so at least you are matching oranges to oranges.

**Comment:** On that same page you reference that HUD now uses blocks in determining the similarities. The use of integration and segregation, but you have chosen for this report to use a tract. Can you tell us why?

**Presenter:** There are some geographic areas...

**Comment:** The data calls for the block and they use this for tract. They want this down to the individuals block system.

**Presenter:** Did you hear what this lady was saying?

**Comment:** I heard it, but my question was directed to you. I would appreciate your explanation.

**Presenter:** Whatever the document says it what we use. You said it was Census tracts, so we used Census tracts.

**Comment:** No, your explanation in the document. I asked why you chose to use Census tracts instead of blocks. Your explanation in the document is that using blocks would show a higher degree of segregation and so my question for you is why you chose to not use blocks?

**Presenter:** Blocks are very small and there are a lot of calculation and we believe that going smaller to get this inflated measure so we try to use a little bit larger geographic measure so it is not inflated, because at a very small level you are going to have a higher value, because you have neighborhoods. One block, your neighborhood, might be priced little bit more than another neighborhood. So, we use something is that idea is that people are coming into contact with one another if they are in the neighborhood or they live a few blocks from one another. So, I think the Census tract is a little bit more accurate way to view that.

**Comment:** Let me just also ask 50 of these for the communities in Mississippi, has that been your approach in all of them based on tracts instead of blocks.

**Presenter:** Usually, yes.

**Comment:** So, you say usually, you don't use it in all of them?

**Presenter:** For example, some states have some simply a non-entitlement state AI and in that case Census tract may or may not work; we might use counties. If we do a statewide with all counties the entire state in its entirety evaluated, we would definitely use that. So, it depends a little bit on the jurisdiction.

**Comment:** I am asking about Mississippi.

**Presenter:** I know, but I am answering the question.

**Comment:** I am trying to understand your answer.

**Presenter:** I tell you what, why don't we talk after the meeting. I would be happy to take time.

**Comment:** Are these questions and answers recorded?

**Presenter:** Yes.

**Comment:** So, if we talk afterward will it be recorded?

**Presenter:** Maybe, maybe not.

Presentation

**Comment:** Doesn't that provide sufficient information to say to banks why is this happening?

**Presenter:** The banks are simply reporting what is happening and not why it is happening.

**Comment:** Who asks who will ask the banks about their structure of lending.

**Presenter:** Most people do ask the banks; the banks do provide three fields. They give a reason, but it is a litany of six or seven reasons on equity, employment, industry, credit history and they don't say which one they use. We also like to measure how many missing is in this category and compare the missing by race. Certain races have a lot more missing than others and they may have said something to one person and something else to someone else. So, we do find differences for those high denial rates tend to have a higher rate of missing in the reason codes. I believe these are reported in the back of the document in the appendix.

**Comment:** I have a question about the same thing. The denial rate you can see it says 2008, the incomes (Not Discernable) highest rate, so my question to you sir who is doing the briefing, from the Mississippi Housing and Development standpoint is there anything that you all are doing or can do to offer some form of education to help with this housing because it is generational; parents, kids, the grandkids. So, what are you all doing to help put them on their home? So, when they come, like their credit sort of things.

**Presenter:** I think this gentleman has an excellent point and I will turn it back to you if you are in Gulfport. The question is are we going to teach our clients. Is this something that we want to take on that expense? I am simply proposing to you these options for you to consider and this sort of dialog that you should have. There is one recommendation in here, but ultimately this document becomes your guys document. So, if you agree or disagree this is a great time to hear that. We went through a couple of versions before we released the draft for public review and we are working through these things all along, but I think your point is excellent. When we implement something and what does that mean. Your point is excellent.

Presentation

**Comment:** ...housing and what we are finding is a group that is left out all together they have absolutely little access to housing in the community. We have tried for years to get with the deaf community and they are very afraid to come to our services even though we would pay for interpreters. They are a community that is an isolated community that somehow needs to be represented in this. It is a disability and a very specific disability here.

**Presenter:** Disabilities that are mentioned in the document are a tally of disabilities. You may have one or more of the tallies, but we also like to hear from people, quantitative input is an important part of this.

**Comment:** I noted in the introduction that you didn't seem to have any private bankers here at this meeting. I am curious is they were invited and declined to come, and I am also curious if you have had an occasion or an opportunity to ask them for their explanation as to why this disparity.

**Presenter:** My experience in reaching out to bankers, I did that more heavily in the beginning and they kind of played "hot potato" to the extent they understand it is going on, but they tell the public we have a process. We distribute the survey to everyone we know, including the Bankers Association and ask them to forward it to their association members so in directly they asked to participate, but typically we don't reach out to a banker and say what is going on here?

**Comment:** There were bankers at the first meeting.

**Presenter:** That is right. Thank you.

**Comment:** Not Discernable

**Presenter:** Which slide was that?

**Comment:** That one.

**Presenter:** HUD adjusted median family income.

Presentation

**Comment:** The reasons they are in that one RCAP too is I'll say is that is when we converted to RAD Housing Authority that is project based, that is why it shows. Those are not individually owned tax credits for the most part that is home assist.

Presentation

**Comment:** There is no public housing.

Presentation

**Comment:** I don't know where that came from.

**Presenter:** I ran a google search and it came up Biloxi Housing.

**Comment:** Sea Shore Heights is a development, but public housing, there is no public housing left. It has all been converted. So, there are no public housing units, probably as of six or five years ago.

**Presenter:** The accuracy of the data base...

**Comment:** We have found a lot of inconsistencies and I will not point them out to you all, but there is nothing we can do if their data is bad, but I can assure you that there is no public housing.

**Presenter:** I have tried to track where this data comes form and the direction the public housing units in the database and when it is kind of a dead end, but we went through the process of creating that and putting things on that so that we could demonstrate that we went through that. If this is inaccurate, I want you to make a comment about that and we will include that in the document and maybe someday HUD will fix this, or they may not.

**Comment:** That is a good point. I have visited some other folks around the state that have had other inconsistencies and I think if anything we can get out of this is letting HUD know that the data they have is not up to date. This is not an isolated incident.

**Comment:** Somehow, I think the data over at HUD depending where you pull it from is inconsistent.

**Presenter:** I agree with that statement.

**Comment:** The data doesn't match, and it is inconsistent.

**Comment:** Another concern is we are going to have to do a five-year Consolidated Plan next year and they require templates now and it is not just providing the answers. They tell you how and if they are analyzing and that is public housing; we are going to be in a quandary to answer a section on public housing. We are going to have to update that. It has been turned to RAD so we if we are going to give input to HUD, please update your information, because the city has to use that data that is in here. We have to reference and say.

**Presenter:** I will tell you a little story about HUDs default values in the Consolidated Plan. In 2014, the released a statement basically saying oops we made a mistake in processing and anybody that has a plan that we have excepted the data is all wrong. So, it was a mess. What we do is try to find what we can and replace those values with an additional table in that document. Over time the values change, and it is not reliable and so then we have at least the values that are most current. So, we use it that way.

Presentation

**Comment:** Backing up to the impediments; I was curious that transportation is an impediment and transportation to school and work and also on page 13, related to issues of lack of opportunities for persons to obtain housing in key areas. Is there a reason you have not identified lack of transportation to essential services? Right now, there is no public transportation to the new job center or the Department of Human Services where you can get benefits and job support. There is no access to this training center, the job center and all these things are financial benefits that might enable families to move from inadequate housing to better housing in higher opportunity areas. I guess my question is, is there a reason this is not identified as an impediment?

**Presenter:** You just identified it. We are going to add that to...

**Comment:** That would be wonderful.

**Presenter:** The question is then is the City or the Housing Authority going to do that. Like I said we have this process when we are reviewing the draft for internal review and your comments are being recorded and we will make a transcript. If you want to write a letter or add some additional data, we will incorporate it.

Presentation

**Comment:** How does the city do that?

**Presenter:** I am sorry. I am having difficulty hearing you. Could you try that again?

**Comment:** How does the city go about moving 20 units of public housing outside of this area.

**Presenter:** You tear it down and build it somewhere else.

(Crosstalk)

**Presenter:** It is all about the money.

**Comment:** It is not the money, tear down public housing, if it is good public housing...nobody is going to fund you to tear down a perfectly good units to build somewhere else. If it is safe, decent, and sanitary housing to start and just because it is may be in a place and it might be nicer somewhere else. They are not going to be like sure just tear it down and displace the families for the three years and I don't know. There are two other housing directors here and are you say sure tear down that housing?

**Comment:** Actually, we don't have any public housing in...

**Comment:** Gulfport or Biloxi. You don't either.

**Comment:** All of my public housing is relatively new, and I am sure that we will not be tearing it down. If we could find a location, the big thing is money. HUD doesn't really give you money to build public housing anymore.

**Presenter:** After our earlier meeting I took your idea and sent it to David, and he has recommended some change in RAD. You have an empty three-bedroom RAD unit and you have somebody who is homeless, they only need a two bedroom and you can't put them in there. So, work with the Housing Authority to petition HUD to make a change and I suggested to David that we put your idea in the document. So, I am not sure if he sent it to you.

**Comment:** We need it like yesterday.

**Comment:** We have five bedrooms and we can't fill them. We have one that is at eight months and we can't find anyone to qualify. It is almost impossible. It has to sit because we can't put and in vouchers, we cannot over house somebody.

**Presenter:** You can either leave it empty or make use of it. So, this is a recommendation that maybe you guys can work through.

Presentation

**Comment:** Instead of just saying public housing, we provide down payment assistance to move anywhere they want to. They could move outside the rehab areas and be the other areas outside.

**Comment:** I can agree with her. We work with low- to moderate-income with Mercy Housing and all of them want to move away from low-income neighborhoods into the other one. They don't want to be in a low-income area. So, what we are basically doing is vacating those areas and they are becoming rentals. I can give you some examples in Biloxi where it is a problem.

Presentation

**Comment:** It is a comment you made about not having access to public transportation. That is already included in the document on page 142 on the comment I made last meeting. Again, I want to that was incorporated. On page 13, it says since 1996 the city has worked with CTA to identify problem areas in measures to improve between Biloxi schools, centers, and housing. Where is our employment center and where is our center it is on C-Way road? We still we do not have access to it.

**Comment:** I would like to make a suggestion to what could be done in Biloxi now and I don't mean this as a criticism, but most of those that are moderate income all of a sudden we find out that we are going to get a new development of moderate income from 400,00 to 500,000 per unit. That is going to raise the taxes on everybody and most of them are elderly. We need to be very careful about the impact of these plans in the neighborhoods. I don't think that we think about this and it happens that way and now we don't have an increase in more traffic on a one- and two-lane road, we are going to

have to install new infrastructure to handle all of the traffic from the VA. We are going to have a mess. We really are going to have a mess before us if we don't have any road structure, we have vehicle traffic, I don't know how any of us are going to be able to get our cars out. It is just not... what we need is better overall planning in the city. I am not saying we don't have it, but we are in for a crisis.

**Presenter:** Thank you.

**Comment:** I just want to ask again, the partners you did the studies for where you used block analysis as opposed to the tract analysis.

**Presenter:** To be quite honest with you, my technical staff handles that. You can compose a question to them. They wrote the technical document and usually they use Census tract. If it is a community with one Census tract, we would probably use blocks.

**Comment:** Good.

## C. MISSISSIPPI CENTER FOR JUSTICE

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The Mississippi Center for Justice supplements its oral comments on May 22, 2019 to the City of Biloxi Final Draft of its 2019 Analysis of Impediments to Fair Housing Choice by submitting these additional written comments.

The Mississippi Center for Justice is a non-profit, public interest law firm established in 2003 for the purpose of advancing economic and racial justice in the State of Mississippi. In 2005, just weeks after Hurricane Katrina struck the Mississippi Gulf Coast, the Center established an office in Biloxi to assist with the recovery needs of Coastal Mississippians. The Center's Coastal advocacy initiatives since 2005 include handling hundreds of FEMA housing appeals, defending countless MEMA cottage evictions, negotiating the reopening of Nichols School as a model Early Head Start Center and Elementary School, and individual representation of over 1500 residents with claims related to the BP Oil Disaster. The investment by the Center in the Biloxi community is significant and time-tested.

### **COMMENT 1:**

As a general observation, the Final Draft accurately sets forth significant documentation to support the fair housing issues/impediments and contributing factors identified at pp. 4-6. In particular, the Center is pleased to see the absence of fair housing infrastructure and discriminatory patterns in lending specifically identified as contributing factors. However, the recommended actions to be taken are in almost all cases insufficiently concrete and measurable. For example, the evidence supporting the identification of discriminatory patterns in lending as a factor contributing to disparities in access to opportunity is overwhelming. Yet the final report proposes no concrete action steps by the City or any other agency to address this factor. There are no metrics for measuring progress toward the elimination of discriminatory lending as a contributing factor.

The lack of specificity, concreteness, and measurability is evident as well in most of the stated recommended actions. (pp.5-6). The Center encourages the City to correct this deficiency by expressly quantifying the level of improvement that it seeks to achieve with respect to each impediment and each contributing factor. For example, instead of using a general phrase such as "continue to partner to provide..." as a recommended action, the City should affirmatively state who it will partner with and what – in measurable units – will be the desired outcome. The 2019 AI for the City of Moss Point contains several good examples of concrete and measurable recommended actions.

In addition to these general comments, the Center offers the following specific comments relating to the continuing and long-standing need for increased access to transit options, as well as a concern relating to the measurement of levels of segregation.

### **COMMENT 2: Transportation Services**

The Mississippi Center for Justice would note that at P.4 of the City of Biloxi And Biloxi Housing Authority 2019 Analysis Of Impediments To Fair Housing Choice the Analysis places a high priority on "Lack of opportunities for persons to obtain housing in higher opportunity areas" and notes as

“Justification” that “Access to higher opportunity areas is limited for many households due to income, transportation and a variety of factors. Black households in Biloxi have markedly lower access to low poverty areas and labor market engagement.” (emphasis supplied)

Thereafter, at P.5 in Table 1.2 in the “Recommended Actions to be Taken” in response to

“Disparities in Access to Opportunity” the City’s proposed action is to “Continue to Consult with local agencies to increase access to transit options for persons in high poverty areas, annually.”

This appears to be no more than a pro forma continuance of the self-congratulatory statement on P.13 that “since 1996 the City has worked with CTA to identify problem areas and measures to improve linkages between Biloxi schools, employment centers and housing.” City of Biloxi And Biloxi Housing Authority 2019 Analysis of Impediments to Fair Housing Choice, P.13.

MCJ notes that this proposed action ignores the recorded community comments at pp. 142-144 outlining the crucial observation that there is at present no public transportation to the WIN Job Center, the social security administration, the Department of Human Services office and the DMV. Thus, “linkages” through public transportation to essential services are worse, not better, than they were in 1996. Since 1996, the WIN job center moved from Pass Road to Seaway Road in Gulfport. Similarly, the Department of Human Services relocated from Bayview Avenue to Seaway Road in Gulfport. These agencies provide essential services to low- and moderate-income individuals residing in the Biloxi community in general and the R/ECAP in particular.

MCJ would further note that the complete absence of public transportation along the approximately 3.1-mile-long Seaway Road in Gulfport means that there is at present no way for those dependent on transportation to access the many essential services located on or just off Seaway Road in Gulfport. These services include but are not limited to the Dept. of Human Services where one must go to obtain child support, TANF, child protective services, etc., the Win Job Center, where job applicants receive training, obtain counseling, search for work, and receive training, and also the Mississippi Gulf Coast Advanced Manufacturing and Technology Center where citizens obtain education and job training.

In consequence residents of Harrison County without private transportation who need access to the above referenced services are forced to walk up to 3.1 miles from the nearest bus stop on Three Rivers Road.

This serves as an obstacle to obtaining essential services and disparately and disproportionately adversely impacts various protected classes including but not limited to African Americans, women with children, and persons with disabilities.

Specifically, African American households are over twice as likely to be without transportation as whites. 10.06 percent of African American Households in Harrison County have no vehicle as opposed to only 4.14 percent of White Households. Thus, the African American community is disparately and disproportionately adversely impacted by the denial of public transportation services to the agencies providing these benefits. See American Community Survey.

Similarly, the denial of public transportation to essential services for children obviously primarily, disparately and disproportionately adversely affects persons based on family composition, i.e. households with children,

Additionally, the denial of public transportation to essential services also disparately and disproportionately affects women as they compose approximately 81%percent of the single head of household families with children in Harrison County. Thus, there are approximately 8027 Female Headed households with children in Harrison County vs. only approximately 1,892 Male Headed Households with children.

Finally, requiring these protected categories of persons to walk disparately and disproportionately adversely affects persons with disabilities, particularly those whose disabilities affect their ability to walk. Some are blind, some are in wheelchairs, and some suffer from psychological disabilities such as paranoia which make it literally impossible for them to walk in the street (there are no sidewalks on Seaway Road) for fear of being run over.

In Section 3608(d) of the Fair Housing Act Congress mandated that “programs and activities relating to housing and urban development... [be administered]... in a manner affirmatively to further the purposes of this subchapter.” Id. As stated in the final Affirmatively Furthering Fair Housing Final Rule at Federal Register Vol. 80, No. 136 Page 42274 “This is not only a mandate to refrain from discrimination but a mandate to take the type of actions that undo historic patterns of segregation and afford access to opportunity that has long been denied.. Id. (Emphasis supplied). This includes addressing: “housing related barriers in access to education, employment, transportation, and jobs, among others, to ensure that these conditions are taken into consideration in making funding decisions. Id at 42286 (emphases supplied).

Additionally, as stated by HUD:” [P]rogram participants that receive assistance from HUD under the programs covered by this final rule have statutory obligations to affirmatively further fair housing, apart from the obligation imposed by the Fair Housing Act itself. They also must comply with the authorizing statutes governing the programs in which they participate, as well as the regulations implementing those statutes. Complying with both types of obligations is a condition of receiving Federal financial assistance from HUD and the obligations are not inconsistent with each other.” Id at 42280

In this regard HUD has stated: “[A]ccess to public transportation options can be critical to providing access to jobs, education, health care, and other amenities and community assets for low-income families, the elderly, and persons with disabilities.” Id at 42337.

The consequence of the denial of public transportation to critical services providing education, employment , nutrition, public benefits and income is “(1) harm to a particular group of persons by a disparate impact; and (2) harm to the community generally by creating, increasing, reinforcing, or perpetuating segregated housing patterns” in that minorities, women, families with children, and the disabled are preventing from accessing the services essential to allowing them to improve their income and so enable them move into more affluent high opportunity areas. See Implementation of

the Fair Housing Act’s Discriminatory Effects Standard, 78 Fed. Reg. at 11469 (describing 24 C.F.R. § 100.500(a) (2016)).

While Coast Transit Authority is primarily responsible for designing its routes, it receives money from the City of Biloxi. Biloxi could provide additional funds, or condition current provision of funds to CTA upon its providing transportation to essential services for its residents. Merely “continuing to consult,” particularly where there is not even an expressed intention to address the specific problem identified in community comments, is not an action step calculated to address this impediment. This is particularly true where, as here, the need for transportation services has been recognized by the City in prior AIs going back as far as 1996. (p.13) Clearly, something more than “consultation” is needed in order to move the needle with respect to transportation needs.

### **COMMENT 3: Segregation and Integration**

MCJ would note at P. 43 of the Analysis it notes that it was determined to use “tract” rather than “block” census information even though the Analysis notes that HUD has used block level data since 2010. The analysis explicitly states that “the decision to use tract-level data in all years included in this study was motivated by the fact that the dissimilarity index is sensitive to the geographic base unit from which it is calculated. Concretely, use of smaller geographic units produces dissimilarity index values that tend to be higher than those calculated from larger geographic units” City of Biloxi And Biloxi Housing Authority 2019 Analysis Of Impediments To Fair Housing Choice P.43.

During the public hearing the presenter, Mr. Gaudin acknowledged that a census “tract” is a larger geographic unit than a census “block,” and that its use resulted in lower segregation values on the dissimilarity index. When the presenter was asked during and again after the meeting for examples of any other Analysis of Impediments in Mississippi which similarly used a tract rather than a block analysis, he was unable to provide an example. Commenters would observe that a block analysis, as used by HUD, should have been performed either instead of or in addition to the tract analysis, and that the dissimilarity index indicating that only American Indians suffer from a moderate level of segregation is not reliable given that the apparently unique method of measurement was deliberately chosen to result in lower measured levels of segregation.

The Mississippi Center for Justice expresses gratitude to the City of Biloxi for the opportunity to present these comments for consideration.

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